

Analysis of Impediments to Fair Housing Choice

St. Louis County, Missouri
Cities of Florissant and O'Fallon, Missouri

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**Prepared for
St. Louis County and the
Cities of Florissant and O'Fallon**

By



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Executive Summary: St. Louis County

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin, and was amended in 1988 to include familial status and disability. HUD grantees receiving funds under the Community Development Block Grant (CDBG) program are required to complete a fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that housing and urban development programs are being administered in a way that furthers fair housing for these protected classes. St. Louis County, the City of Florissant, and the City of O'Fallon participate together in a Consortium for the purpose of accessing federal affordable housing funds under HUD's Home Investment Partnerships Act (HOME) program. Because of the collaborative affordable housing planning undertaken by the Consortium, the members sought to jointly conduct this AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

Historical Overview

St. Louis County was formed on October 1, 1812 as one of the counties organized by Governor William Clark out of the five administrative districts of the Upper Louisiana Territory. While it originally included the City of St. Louis, the two were separated in 1876, leaving the County predominately rural, with a few small urban centers. At present, the County has 91 municipalities and an unincorporated area that includes nearly one-third of the population. St. Louis County made up 16.7% percent of the state's 2010 population, 48% of the jobs in the St. Louis Metropolitan Area, and 23% of the jobs in the State of Missouri.

Demographic Overview

As of the 2010 Census, St. Louis County was home to 998,954 people, a loss of 1.7% since 2000. The majority of its population was non-Hispanic Whites (68.9%). Black residents made up about one-quarter of the population (23.2%) and no other race or ethnicity constituted more than 4% of the population.

Median household income in St. Louis County (\$58,385) was higher than that of the State of Missouri (\$47,333) according to the 2008-2012 American Community Survey. The County had unemployment rates under 5% prior to the national recession, but unemployment climbed to about 9% by 2009. By 2013, the rate fell to just above 6%, still over pre-recession levels. According to 2012 estimates, educational services, health care and social assistance employees represent the largest shares of workers in St. Louis County (25.6% of the total).

Protected Class Analysis

The majority of St. Louis County's Black population lives in north St. Louis County, where 26 census tracts had Black populations of 80% or higher in 2010. Only 7 tracts south of I-64 had Black populations over 10%. Hispanic residents constituted 2.5% of the County's 2010 population; the largest concentration of Latino population (17.4% of the county's total) was in ten tracts that cover Breckinridge Hills, Woodson Terrace, St. Ann, Overland, Charlack, Edmundson, and St. John.

According to the 2008-2012 American Community Survey, 6.8% of St. Louis County residents were not native to the United States, well below the national foreign-born population rate of 12.8%. The largest share of foreign-born County residents were from Asia (44.6%), followed by Europe (30.0%).

As of the 2010 Census, nearly two-thirds of St. Louis County households were families. About half of families and one-third of total households (31.0%) included children, down from 33.9% in 2000. Female householders made up 34.6% of total households, an increase of 8.0% from the previous Census.

The 2008-2012 ACS data shows that 11.2% of the County's population has a disability. Just over half (56.8%) of that group are under age 65.

The 2010 U.S. Religion Census: Religious Congregations & Membership Study indicates that 51.7% of St. Louis County's population adhere to a religion. Catholics make up the largest share of the population at 23.1%, followed by Evangelical Protestants (16.3%).

Segregation Analysis

Four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation were used in this study. A reconciliation of the four indices has shown that, on the whole in St. Louis County, segregation between Blacks and Whites is high and persistent, with little change from 2000 to 2010. Whites tend to be isolated with only limited exposure to Blacks and other minority groups.

Public Investment & Infrastructure

Several interstate highways serve the St. Louis region and St. Louis County. Public transit (known as "Metro") includes a fleet of buses, light rail and paratransit vehicles that serves portions of St. Louis County. Limited transit access in some parts of the County was mentioned frequently among stakeholders and survey respondents as an issue for some protected class members, and increasing regional connectivity was identified as a key theme for the East-West Gateway Council of Government's OneSTL plan.

The quality of public schools within a community can also be a primary driver of housing choice. St. Louis County has 23 public school districts, of which 17 had graduation rates above the statewide

rate in 2013. Two of those in the County with lower graduation rates are currently unaccredited (Normandy and Riverview Gardens), reducing access to education for school-aged children in north St. Louis County.

Access to Areas of Opportunity

This analysis uses HUD-provided data to evaluate relative opportunity levels on six neighborhood dimensions (poverty, school proficiency, labor market engagement, jobs access, transit access, and health hazards exposure). In St. Louis County, Black residents face large opportunity gaps relative to White residents in that they are more likely to live in neighborhoods with higher poverty, lower school proficiency, and less labor market engagement. These disparities persist regardless of poverty status. For jobs access and exposure to environmental health hazards, values were relatively consistent across all races and ethnicities, suggesting a somewhat even distribution of these dimensions across the region. Transit access was uniformly better for minority residents compared to Whites and for persons in poverty compared to those not in poverty.

Land Use & Zoning

Zoning codes for St. Louis County and five St. Louis County municipalities (selected by the St. Louis County Office of Community Development) were individually reviewed against a set of fair housing criteria and assigned a risk score (1=low risk; 3=high risk) indicative of the codes' potential to result in housing discrimination.

Overall risk scores ranged from a low of 1.44 in University City and Chesterfield to a high of 1.83 in Sunset Hills. St. Louis County scored 1.61, indicating a moderate risk of contributing to discriminatory housing treatment. Codes with a greater risk for housing discrimination are those that limit residential uses such as substance abuse treatment facilities to non-residential areas, have restrictive definitions of "family," and have restrictive regulations regarding home modifications to accommodate persons with a disability.

Housing Profile

According to the 2008-2012 ACS estimates, St. Louis County contained a total of 437,803 housing units, the majority of which were single-family detached (72.3%). The homeownership rate was 71.4%; vacancy rates were substantially lower for ownership units (2.2%) than for rental units (6.7%). The vast majority of the County's housing stock was built between 1950 and 1979.

Because many protected classes tend to have lower than average incomes, housing affordability becomes an important aspect of fair housing choice. HUD considers housing affordable if it costs less than 30% of a family's income. In St. Louis County, 44.4% of renters have a cost burden, compared to 23.4% of owners. The National Low Income Housing Coalition's *Out of Reach* 2014 Annual Report calculates the amount of income a household must receive in order to afford a rental unit at the Fair Market Rent (FMR) without spending over 30% of income. A renter at the mean

renter income in St. Louis County would need to keep rent costs at or below \$748 to avoid a cost burden.

Fair Housing Organizations & Activities

St. Louis County is served by several local fair housing, affordable housing, and homeless service organizations, among them the Equal Housing Opportunity Council (EHOC), Beyond Housing, Legal Services of Eastern Missouri, Community Action Agency of St. Louis County, the Lemay Housing Partnership, and Catholic Charities. Activities include fair housing testing, complaint investigation, fair housing education, transitional housing, rent and mortgage assistance, and other housing-related assistance. Survey responses indicate that additional fair housing education may be needed in the study area, as less than half of participants (43.1%) indicated knowing their fair housing rights. Few respondents (9) experienced housing discrimination, but of those that did only 20% reported it.

Housing Discrimination Complaints

Based on responses from fair housing agencies for the 2009-2014 reporting period, 280 discrimination complaints were received for St. Louis County by EHOC and the Missouri Commission on Human Rights. Allegations of discrimination based on color/race were the most common (101 complaints). Of the 79 complaints where a transaction area was identified, the majority were for rental housing (43 complaints), followed by lending (23 complaints), and discriminatory advertising (11 complaints).

Housing Discrimination Lawsuits

A review of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between 2005 and May 2014 within St. Louis County revealed 5 lawsuits with substantial bearing on the availability of fair housing choice. The cases reviewed tend to involve three fair housing issues: (1) discriminatory lending practices that targeted a protected class; (2) occupancy limits and restrictive definitions of “family”; and (3) prohibiting residential occupancy permits for persons who cannot provide proof of citizenship or legal residency.

Hate Crimes

As defined by the Hate Crime Statistics Act of 1990 (28 U.S.C. § 534), hate crimes are “crimes that manifest evidence of prejudice based on race, gender or gender identity, religion, disability, sexual orientation, or ethnicity.” Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments. The FBI’s Uniform Crime Reporting Program data shows that 34 incidences of hate crimes were reported in St. Louis County from 2008 to 2012, the majority of which were motivated by race (24 incidences).

Impediments and Recommendations

Impediments identified through this research are summarized below 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 barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment: Affordable Housing Options Concentrated in Areas of Low Opportunity

In St. Louis County, affordable housing options, both subsidized and non-subsidized, tend to be concentrated in urban areas of low opportunity,¹ particularly in the North County region which includes the City of Florissant. This impediment is similar to the OneSTL FHEA's finding that the "(l)ocation of affordable housing perpetuates segregation and limits access to opportunity." In North County and in the Lemay area, affordable housing exists, sometimes with housing quality issues, but the ability of area residents to improve economically is challenging. This report's analysis of access to areas of opportunity revealed that areas with low opportunity in terms of poverty, school, proficiency, and labor market engagement are overwhelmingly concentrated in North County communities. Public input reinforced this finding, with residents commenting that suburban areas outside St. Louis County tended to have higher performing schools, lower crime rates, and better housing conditions. Residents of the study area interviewed for this report further cited a general shortage of Section 8 units available in the County outside the North County area. Still others named the low quality and deteriorating condition of existing affordable housing units as problems. Taken together, the relative concentration of housing options affordable to people of low- and moderate-income (who are disproportionately minorities) in high poverty areas without access to quality schools and with low rates of labor market participation is an inherent restriction on housing choice.

Recommendations

Local governments in the study area should partner with the private sector to create more mixed income housing using available public resources such as the HOME Program, Low Income Housing Tax Credits, and state or local housings bonds. Equally important could be the creation of a Mixed Income Housing Investment Program, capitalized by lenders, which would provide incentive financing to developers who construct sustainable mixed income housing in these regions of the study area.

For affordable housing developments receiving public subsidy or incentives from a local government entity (e.g. St. Louis County, Florissant, or other municipalities) the source of public

¹ This Analysis of Impediments looks at neighborhood opportunity on six dimensions as defined by HUD, including poverty, school proficiency, labor market engagement, access to jobs, access to transit, and exposure to environmental health hazards. The County may choose to use these factors or develop an alternate definition of opportunity based on similar measures of community health.

funds should prioritize projects located in high opportunity areas of the county, especially those with transit access. To the extent these local government entities can influence the award of tax credits by the Missouri Housing Development Commission to developers for new affordable housing projects either through letters of endorsement or the investment of CDBG funds, such measures should be reserved for those projects in high opportunity areas.

The efforts of groups like Beyond Housing, which focuses on comprehensive community investments, stand as an example of how improving institutions that generate economic activity should accompany affordable housing rehabilitation and preservation. If an area and its residents do not have access to adequate income, rehabilitated housing will become subject to deferred maintenance and the unit may again contribute to poorer housing quality in that area.

Other existing organizations such as SLEHCRA (St. Louis Equal Housing and Community Reinvestment Alliance) are already working to improve opportunity in North County areas and their work should be supported by St. Louis County and Florissant. New bank branches have opened in low opportunity North County areas (Ferguson, Overland, and Pagedale) with record numbers of deposits in their first weeks. Positive results like these should be promoted to encourage further investment in these communities. In areas like North County that are economically distressed, the types of employment opportunities available can perpetuate the cycle of unemployment and underemployment. Public and private sector job training programs should be crafted that are designed to raise the skill levels of area residents to match employment opportunities with better pay in that area.

Expansion of the Section 8 program to include more units accepting the vouchers throughout St. Louis County would increase affordable housing options in areas of greater opportunity and is consistent with one of the recommendations of the 2012 St. Louis County Housing Study. The County should encourage rental property owners in high opportunity areas to accept Section 8 vouchers through an education program that describes how the vouchers work and includes testimonials from other local landlords who have had success with the Section 8 program. St. Louis County and the City of Florissant should also explore the option of offering discounted occupancy permits and/or expedited inspections for Section 8 landlords, and work with other jurisdictions in the county who may be willing to offer similar incentives. The St. Louis County Housing Study also recommended the creation of Voucher Counseling Centers where voucher recipients could be assisted in locating housing units in locations that might not be concentrated in high poverty areas.

Impediment: NIMBY/Prejudiced Attitudes

Segregation between Black and White residents of the study area is high (dissimilarity index value of 0.71) and remained unchanged between 2000 and 2010. Whereas studies of other communities outside the St. Louis region tend to reveal declining levels of racial and ethnic segregation, the issue in this study area appears to be persistent. Public input and comments received through the Fair Housing Survey conducted in conjunction with this AI reveal that some residents of the study area

hold strong “Not In My Back Yard” (NIMBY) sentiments as well as attitudes prejudiced against people of low-income, those residing in subsidized housing, and racial/ethnic minorities.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Segregatory living patterns and prejudiced personal beliefs and attitudes create negative impacts on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of the value of diversity and integration is especially important (this was also recommendation 1.1 in the OneSTL FHEA). The local governments within the study area should continue to support and work with organizations (such as InvestSTL) dedicated to promoting diversity throughout metro St. Louis and St. Louis County.

Collaborating with the assigned HUD Office of Fair Housing and Equal Opportunity and/or with local fair housing advocacy organizations, the entitlement communities should develop an appropriate diversity and sensitivity awareness 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.

A separate campaign to educate local leaders and elected officials in St. Louis County jurisdictions and in O’Fallon regarding the economic benefits of diversity should be developed, and they should be encouraged to participate in countywide or regional initiatives. The campaign should identify and publicize local examples of success, such as that of the Brentwood School District which has taken a deliberate approach of embracing diversity.

Impediment: Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements

In the sample of municipal zoning codes reviewed in conjunction with this AI, many were found to have restrictive definitions of “family,” unreasonably restricting the number of unrelated people permitted to live together in a housing unit. For example, in 2006, the City of Black Jack settled a suit ([Loving v. City of Black Jack](#)) that arose out of the denial of an occupancy permit for a household that, under the city’s code, exceeded the limit of three unrelated members.

The impact of these restrictive definitions found in local zoning codes is amplified by occupancy permitting requirements. In Florissant, O’Fallon, and in many other communities in the study area, a permit must be obtained from the municipal government for the number of persons occupying a housing unit. Changes in the household composition (i.e. the number of occupants) require a new permit. In addition, some municipalities require proof of legal residency in order to obtain an occupancy permit. In this way, communities are able to control, by approval or denial of a permit, who may live in their jurisdiction, expressly limiting fair housing choice. It should be noted that St.

Louis County's zoning code affects only unincorporated areas of the county and that the county government has no control over municipal ordinances.

Recommendations:

The entitlement communities should explore the opportunity to partner with a local university for a review of occupancy permit requirements, family definitions, and zoning ordinances (including regulations regarding group homes and residential treatment centers) in all St. Louis County jurisdictions and in O'Fallon. This work could be led by a professor with research support from public policy or planning graduate students. When the review is complete, the results should be presented to a panel of community representatives, representing various stakeholder groups (including planners, zoning officials, fair housing advocates, and advocates for immigrants) who should then advocate ordinance revisions where appropriate.

Impediment: Limited Housing Options for People with Disabilities

In both the sample set of municipal zoning codes reviewed as part of this AI and in the review of fair housing-related lawsuits for jurisdictions in the study area, ordinance and policy provisions often restricted housing choice for people with disabilities. In half of the zoning codes reviewed, a spacing requirement was imposed between group homes for people with disabilities. Such requirements, when applied to housing for people with disabilities but not to housing types occupied by others, has potential to violate the Fair Housing Act. Of the zoning codes reviewed none provided a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Further, the codes in the sample set also restricted residential treatment facilities only to non-residential zones. Under federal law, it is discriminatory to deny an individual or entity the right to site a treatment program in a residential zone because it will serve individuals with alcohol or other drug problems. Particularly in Florissant and St. Louis County, the age of the housing stock also may limit the availability of housing units accessible to people with disabilities, as older housing units are less likely to have been built to modern accessibility or visitability standards.

Recommendations:

It is recommended that St. Louis County, Florissant, and O'Fallon meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. For housing developments with public funding, prioritize those that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal

design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Regarding reasonable accommodation standards, model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These models should be compiled by a regional organization and advocated to local municipalities.

Impediment: Private Sector Lending Discrimination

Since 2005, two significant lawsuits have been filed against banks operating in or headquartered in St. Louis County alleging discrimination on the basis of race and color in lending. Specifically, banks in these two cases were said to have intentionally declined to provide loans to African Americans or within predominantly African American communities. In both of these lawsuits, the banks involved denied wrongdoing and settled the suits to avoid litigation. However, the similarities between the two cases, the specific racial group denied loans, and the unwillingness to make loans within specific communities raises important issues of fair housing choice.

Recommendations:

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) and SLEHCRA have been working to pressure lenders to stop disinvestment in areas with majority-minority populations and reinvest in these regions. In fact, EHOC was involved in both of the cited lawsuits, as a plaintiff in one and an informant in the other. This investigative and advocacy work should be supported by the entitlement communities. Additionally, these or other local organizations should be funded and charged with fair housing education and testing efforts as well as periodic review and analysis of lending data provided by banks and other lenders under the Home Mortgage Disclosure Act. Publicly praise or otherwise recognize financial institutions with a record of supporting fair housing initiatives. For County and City financial business, give banks that have not supported fair housing goals a low priority.

Impediment: Difficulties with Fair Housing Compliance from Small-Scale Landlords

Some stakeholders interviewed in the course of this analysis noted that acts of housing discrimination are more prevalent in the study area from small-scale landlords who own or manage very limited numbers of housing units. Survey results, while quite limited, provide some anecdotal support for this perspective: of the four respondents who reported having faced housing discrimination, all of them named a landlord or property manager as the perpetrator of the discrimination.

Recommendations:

As recommended in the 2012 St. Louis County Housing Study, more outreach and training is needed to educate rental property owners and managers on the requirements of the Fair Housing Act, the definitions of protected classes, discriminatory practices, and potential consequences for non-compliance. The St. Louis Apartment Association (SLAA) offers education opportunities and could

play a coordinating role in the outreach and education of small-scale landlords in the study area. Support for continued testing by EHOC or a similar organization is also recommended, with capacity for subsequent legal action if necessary.

Executive Summary: City of Florissant

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin, and was amended in 1988 to include familial status and disability. HUD grantees receiving funds under the Community Development Block Grant (CDBG) program are required to complete a fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that housing and urban development programs are being administered in a way that furthers fair housing for these protected classes. St. Louis County, the City of Florissant, and the City of O'Fallon participate together in a Consortium for the purpose of accessing federal affordable housing funds under HUD's Home Investment Partnerships Act (HOME) program. Because of the collaborative affordable housing planning undertaken by the Consortium, the members sought to jointly conduct this AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

Historical Overview

Florissant was first organized as a civil government in 1786 (then called the Village of San Fernando), and incorporated as a municipality in 1829. It has been closely associated with religious activities throughout its history. Blessed Mother Philippine Duchesne was an early settler, founding a novitiate and an Indian school, and the St. Stanislaus Seminary opened in 1823. As of 2010, Florissant was the 12th largest city in Missouri with a population of 52,158. It ranked 73 on Money Magazine's list of the top 100 Best Places to live in 2012.

Demographic Overview

As of the 2010 Census, Florissant was home to 52,158 people, a gain of 3.3% since 2000. The majority of the population was White (68.2% as of 2010) and over one-quarter was Black (26.2%). No other minority group made up more than 3% of the city's population. Median household income in Florissant (\$51,529) was higher than that of the State of Missouri (\$47,333) according to the 2008-2012 American Community Survey.

Florissant had an unemployment rate at about 5% prior to the national recession, climbing to as high as 10.0% by 2009. By 2013, the rate fell to about 7%, still above the pre-recession level.

Protected Class Analysis

Racial diversity increased substantially in Florissant from 2000 to 2010 as the Black population grew by 140.5%. Other minority groups also saw strong population growth, although they remained a low overall share of the city's population. Looking at racial composition by census tract, the share

of African American residents ranges from below 10% in the center of the city, to 40-56% in several tracts along its northern and eastern borders. No tracts were more than 4% Hispanic.

According to the 2008-2012 American Community Survey, 2.2% of Florissant residents were not native to the United States, well below the national foreign born population rate of 12.8%. No tract showed a concentration of foreign-born residents.

As of the 2010 Census, nearly two-thirds of Florissant households were families (65.0%) and 31.8% had children, down slightly from 32.9% in 2000. Female householders made up 37.7% of total households, an increase of 18.4% from the previous Census. Households with children and female householders were not concentrated in any census tracts within Florissant.

The 2008-2012 ACS data shows that 13.9% of the County's population has a disability. Just over half (57.9%) of that group are under age 65.

The 2010 U.S. Religion Census: Religious Congregations & Membership Study indicates that 51.7% of St. Louis County's population adhere to a religion. Catholics make up the largest share of the population at 23.1%, followed by Evangelical Protestants (16.3%). Data is not available below the county level.

Segregation Analysis

Four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation were used in this study. A reconciliation of the four indices has shown that, on the whole in St. Louis County, segregation between Blacks and Whites is high and persistent and Whites tend to be isolated with only limited exposure to Blacks and other minority groups. Because Florissant is part of the larger St. Louis County area and levels of segregation, exposure, and isolation within the city are heavily affected by residential patterns within the County, separate indices were not calculated for the city itself.

Public Investment & Infrastructure

Several interstate highways connect the St. Louis region, and I-270 passes through Florissant's southern edge. Public transit (known as "Metro") includes a fleet of buses, light rail and paratransit vehicles that serve Florissant and other parts of St. Louis County.

The quality of public schools within a community can also be a primary driver of housing choice. Florissant is served by the Ferguson-Florissant and Hazelwood school districts, both of which had graduation rates relatively in line with the state rate as of the 2013 school year (79.4%, 89.4%, and 85.6%, respectively).

Access to Areas of Opportunity

This analysis uses HUD-provided data to evaluate relative opportunity levels on six neighborhood dimensions (poverty, school proficiency, labor market engagement, jobs access, transit access, and health hazards exposure). In terms of poverty, school proficiency, and labor market engagement, opportunity levels in Florissant tend to be above those of many areas in north St. Louis County, but behind those of the central and southern portions of the county. Florissant has superior transit access when compared with much of St. Louis County, especially areas outside of I-270. Jobs access varies throughout the city, but tends to be slightly better in its eastern portion. Health hazards exposure is uniform throughout Florissant and most of St. Louis County.

Land Use & Zoning

Florissant's zoning code was reviewed against a set of fair housing criteria and assigned a risk score (1=low risk; 3=high risk) indicative of its potential to result in housing discrimination. The city's overall risk score was 1.61, indicating a moderate risk of its zoning and land use regulations contributing to discriminatory housing treatment or impeding fair housing choice. Among the provisions with greatest risk for restricting housing choice are those concerning the means by which persons with disabilities may make modifications to their homes and provisions restricting the placement of alcohol and/or drug abuse treatment centers.

Housing Profile

According to the 2008-2012 ACS estimates, Florissant contained a total of 23,793 housing units, of which the majority were single-family detached units (78.9%); the homeownership rate was 74.0%. Vacancy rates in the city were substantially lower for ownership units (1.6%) than for rental units (10.8%). The vast majority of Florissant's housing stock was built between 1950 and 1979.

Because many protected classes tend to have lower than average incomes, housing affordability becomes an important aspect of fair housing choice. HUD considers housing affordable if it costs less than 30% of a family's income. In Florissant, 42.7% of renters have a cost burden, compared to 24.1% of owners. The National Low Income Housing Coalition's *Out of Reach* 2014 Annual Report calculates the amount of income a household must receive in order to afford a rental unit at the Fair Market Rent (FMR) without spending over 30% of income. A renter at the mean renter income in St. Louis County would need to keep rent costs at or below \$748 to avoid a cost burden. Data is not available for geographies below the county level.

Fair Housing Organizations & Activities

Florissant is served by several local fair housing, affordable housing, and homeless service organizations, among them the Equal Housing Opportunity Council (EHOC), Legal Services of Eastern Missouri, Community Action Agency of St. Louis County, and Catholic Charities. Activities include fair housing testing, complaint investigation, fair housing education, transitional housing,

rent and mortgage assistance, and other housing-related assistance. Survey responses indicate that additional fair housing education may be needed in the study area, as less than half of participants (43.1%) indicated knowing their fair housing rights. Few respondents (9) experienced housing discrimination, but of those that did only 20% reported it.

Housing Discrimination Complaints

Based on responses from fair housing agencies for the 2009-2014 reporting period, 280 discrimination complaints were received for St. Louis County by EHOC and the Missouri Commission on Human Rights. Allegations of discrimination based on color/race were the most common (101 complaints). Of the 79 complaints where a transaction area was identified, the majority were for rental housing (43 complaints), followed by lending (23 complaints), and discriminatory advertising (11 complaints). The organizations providing this complaint data did not break down the complaints received by municipality. Accordingly, the number of complaints filed specifically in the City of Florissant was not available.

Housing Discrimination Lawsuits

A review of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between 2005 and May 2014 revealed 5 lawsuits within St. Louis County with substantial bearing on the availability of fair housing choice. The cases reviewed tend to involve three fair housing issues: (1) discriminatory lending practices that targeted a protected class; (2) occupancy limits and restrictive definitions of “family”; and (3) prohibiting residential occupancy permits for persons who cannot provide proof of citizenship or legal residency. None of these cases were filed in or against the City of Florissant.

Hate Crimes

As defined by the Hate Crime Statistics Act of 1990 (28 U.S.C. § 534), hate crimes are “crimes that manifest evidence of prejudice based on race, gender or gender identity, religion, disability, sexual orientation, or ethnicity.” Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments. The FBI’s Uniform Crime Reporting Program data shows that 34 incidences of hate crimes were reported in St. Louis County from 2008 to 2012, but that none of these reported crimes occurred within Florissant.

Impediments and Recommendations

Impediments identified through this research are summarized below 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 barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment: Affordable Housing Options Concentrated in Areas of Low Opportunity

In St. Louis County, affordable housing options, both subsidized and non-subsidized, tend to be concentrated in urban areas of low opportunity,² particularly in the North County region which includes the City of Florissant. This impediment is similar to the OneSTL FHEA's finding that the "(l)ocation of affordable housing perpetuates segregation and limits access to opportunity." In North County and in the Lemay area, affordable housing exists, sometimes with housing quality issues, but the ability of area residents to improve economically is challenging. This report's analysis of access to areas of opportunity revealed that areas with low opportunity in terms of poverty, school, proficiency, and labor market engagement are overwhelmingly concentrated in North County communities. Public input reinforced this finding, with residents commenting that suburban areas outside St. Louis County tended to have higher performing schools, lower crime rates, and better housing conditions. Residents of the study area interviewed for this report further cited a general shortage of Section 8 units available in the County outside the North County area. Still others named the low quality and deteriorating condition of existing affordable housing units as problems. Taken together, the relative concentration of housing options affordable to people of low- and moderate-income (who are disproportionately minorities) in high poverty areas without access to quality schools and with low rates of labor market participation is an inherent restriction on housing choice.

Recommendations

Local governments in the study area should partner with the private sector to create more mixed income housing using available public resources such as the HOME Program, Low Income Housing Tax Credits, and state or local housings bonds. Equally important could be the creation of a Mixed Income Housing Investment Program, capitalized by lenders, which would provide incentive financing to developers who construct sustainable mixed income housing in these regions of the study area.

For affordable housing developments receiving public subsidy or incentives from a local government entity (e.g. St. Louis County, Florissant, or other municipalities) the source of public funds should prioritize projects located in high opportunity areas of the county, especially those with transit access. To the extent these local government entities can influence the award of tax credits by the Missouri Housing Development Commission to developers for new affordable housing projects either through letters of endorsement or the investment of CDBG funds, such measures should be reserved for those projects in high opportunity areas.

² This Analysis of Impediments looks at neighborhood opportunity on six dimensions as defined by HUD, including poverty, school proficiency, labor market engagement, access to jobs, access to transit, and exposure to environmental health hazards. The County may choose to use these factors or develop an alternate definition of opportunity based on similar measures of community health.

The efforts of groups like Beyond Housing, which focuses on comprehensive community investments, stand as an example of how improving institutions that generate economic activity should accompany affordable housing rehabilitation and preservation. If an area and its residents do not have access to adequate income, rehabilitated housing will become subject to deferred maintenance and the unit may again contribute to poorer housing quality in that area.

Other existing organizations such as SLEHCRA (St. Louis Equal Housing and Community Reinvestment Alliance) are already working to improve opportunity in North County areas and their work should be supported by St. Louis County and Florissant. New bank branches have opened in low opportunity North County areas (Ferguson, Overland, and Pagedale) with record numbers of deposits in their first weeks. Positive results like these should be promoted to encourage further investment in these communities. In areas like North County that are economically distressed, the types of employment opportunities available can perpetuate the cycle of unemployment and underemployment. Public and private sector job training programs should be crafted that are designed to raise the skill levels of area residents to match employment opportunities with better pay in that area.

Expansion of the Section 8 program to include more units accepting the vouchers throughout St. Louis County would increase affordable housing options in areas of greater opportunity and is consistent with one of the recommendations of the 2012 St. Louis County Housing Study. The County should encourage rental property owners in high opportunity areas to accept Section 8 vouchers through an education program that describes how the vouchers work and includes testimonials from other local landlords who have had success with the Section 8 program. St. Louis County and the City of Florissant should also explore the option of offering discounted occupancy permits and/or expedited inspections for Section 8 landlords, and work with other jurisdictions in the county who may be willing to offer similar incentives. The St. Louis County Housing Study also recommended the creation of Voucher Counseling Centers where voucher recipients could be assisted in locating housing units in locations that might not be concentrated in high poverty areas.

Impediment: NIMBY/Prejudiced Attitudes

Segregation between Black and White residents of the study area is high (dissimilarity index value of 0.71) and remained unchanged between 2000 and 2010. Whereas studies of other communities outside the St. Louis region tend to reveal declining levels of racial and ethnic segregation, the issue in this study area appears to be persistent. Public input and comments received through the Fair Housing Survey conducted in conjunction with this AI reveal that some residents of the study area hold strong “Not In My Back Yard” (NIMBY) sentiments as well as attitudes prejudiced against people of low-income, those residing in subsidized housing, and racial/ethnic minorities.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Segregatory living patterns and prejudiced personal beliefs and attitudes create negative impacts

on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of the value of diversity and integration is especially important (this was also recommendation 1.1 in the OneSTL FHEA). The local governments within the study area should continue to support and work with organizations (such as InvestSTL) dedicated to promoting diversity throughout metro St. Louis and St. Louis County.

Collaborating with the assigned HUD Office of Fair Housing and Equal Opportunity and/or with local fair housing advocacy organizations, the entitlement communities should develop an appropriate diversity and sensitivity awareness 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.

A separate campaign to educate local leaders and elected officials in St. Louis County jurisdictions and in O'Fallon regarding the economic benefits of diversity should be developed, and they should be encouraged to participate in countywide or regional initiatives. The campaign should identify and publicize local examples of success, such as that of the Brentwood School District which has taken a deliberate approach of embracing diversity.

Impediment: Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements

In the sample of municipal zoning codes reviewed in conjunction with this AI, many were found to have restrictive definitions of “family,” unreasonably restricting the number of unrelated people permitted to live together in a housing unit. For example, in 2006, the City of Black Jack settled a suit (Loving v. City of Black Jack) that arose out of the denial of an occupancy permit for a household that, under the city's code, exceeded the limit of three unrelated members.

The impact of these restrictive definitions found in local zoning codes is amplified by occupancy permitting requirements. In Florissant, O'Fallon, and in many other communities in the study area, a permit must be obtained from the municipal government for the number of persons occupying a housing unit. Changes in the household composition (i.e. the number of occupants) require a new permit. In addition, some municipalities require proof of legal residency in order to obtain an occupancy permit. In this way, communities are able to control, by approval or denial of a permit, who may live in their jurisdiction, expressly limiting fair housing choice.

Recommendations:

The entitlement communities should explore the opportunity to partner with a local university for a review of occupancy permit requirements, family definitions, and zoning ordinances (including regulations regarding group homes and residential treatment centers) in all St. Louis County jurisdictions and in O'Fallon. This work could be led by a professor with research support from public policy or planning graduate students. When the review is complete, the results should be

presented to a panel of community representatives, representing various stakeholder groups (including planners, zoning officials, fair housing advocates, and advocates for immigrants) who should then advocate ordinance revisions where appropriate.

Impediment: Limited Housing Options for People with Disabilities

In both the sample set of municipal zoning codes reviewed as part of this AI and in the review of fair housing-related lawsuits for jurisdictions in the study area, ordinance and policy provisions often restricted housing choice for people with disabilities. In half of the zoning codes reviewed, a spacing requirement was imposed between group homes for people with disabilities. Such requirements, when applied to housing for people with disabilities but not to housing types occupied by others, has potential to violate the Fair Housing Act. Of the zoning codes reviewed none provided a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Further, the codes in the sample set also restricted residential treatment facilities only to non-residential zones. Under federal law, it is discriminatory to deny an individual or entity the right to site a treatment program in a residential zone because it will serve individuals with alcohol or other drug problems. Particularly in Florissant and St. Louis County, the age of the housing stock also may limit the availability of housing units accessible to people with disabilities, as older housing units are less likely to have been built to modern accessibility or visitability standards.

Recommendations:

It is recommended that St. Louis County, Florissant, and O'Fallon meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. For housing developments with public funding, prioritize those that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Regarding reasonable accommodation standards, model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These models should be compiled by a regional organization and advocated to local municipalities.

Impediment: Private Sector Lending Discrimination

Since 2005, two significant lawsuits have been filed against banks operating in or headquartered in St. Louis County alleging discrimination on the basis of race and color in lending. Specifically, banks

in these two cases were said to have intentionally declined to provide loans to African Americans or within predominantly African American communities. In both of these lawsuits, the banks involved denied wrongdoing and settled the suits to avoid litigation. However, the similarities between the two cases, the specific racial group denied loans, and the unwillingness to make loans within specific communities raises important issues of fair housing choice.

Recommendations:

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) and SLEHCRA have been working to pressure lenders to stop disinvestment in areas with majority-minority populations and reinvest in these regions. In fact, EHOC was involved in both of the cited lawsuits, as a plaintiff in one and an informant in the other. This investigative and advocacy work should be supported by the entitlement communities. Additionally, these or other local organizations should be funded and charged with fair housing education and testing efforts as well as periodic review and analysis of lending data provided by banks and other lenders under the Home Mortgage Disclosure Act. Publicly praise or otherwise recognize financial institutions with a record of supporting fair housing initiatives. For County and City financial business, give banks that have not supported fair housing goals a low priority.

Impediment: Difficulties with Fair Housing Compliance from Small-Scale Landlords

Some stakeholders interviewed in the course of this analysis noted that acts of housing discrimination are more prevalent in the study area from small-scale landlords who own or manage very limited numbers of housing units. Survey results, while quite limited, provide some anecdotal support for this perspective: of the four respondents who reported having faced housing discrimination, all of them named a landlord or property manager as the perpetrator of the discrimination.

Recommendations:

As recommended in the 2012 St. Louis County Housing Study, more outreach and training is needed to educate rental property owners and managers on the requirements of the Fair Housing Act, the definitions of protected classes, discriminatory practices, and potential consequences for non-compliance. The St. Louis Apartment Association (SLAA) offers education opportunities and could play a coordinating role in the outreach and education of small-scale landlords in the study area. Support for continued testing by EHOC or a similar organization is also recommended, with capacity for subsequent legal action if necessary.

Executive Summary: City of O'Fallon

Introduction

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin, and was amended in 1988 to include familial status and disability. HUD grantees receiving funds under the Community Development Block Grant (CDBG) program are required to complete a fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI) to ensure that housing and urban development programs are being administered in a way that furthers fair housing for these protected classes. St. Louis County, the City of Florissant, and the City of O'Fallon participate together in a Consortium for the purpose of accessing federal affordable housing funds under HUD's Home Investment Partnerships Act (HOME) program. Because of the collaborative affordable housing planning undertaken by the Consortium, the members sought to jointly conduct this AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

Historical Overview

The City of O'Fallon is located in St. Charles County in eastern Missouri, approximately 35 miles west of downtown St. Louis. It was founded in 1856 by German immigrants and incorporated in 1912. By 2010, its population reached 79,329, and in 2012 it was ranked 39 in Money Magazine's top 100 places to live.

Demographic Overview

O'Fallon's 2010 population of 79,329 residents represented a 71.8% expansion since 2000. The vast majority of the city's population is non-Hispanic White (88.2%). Black residents make up 4.0% of the population, Asians make up 3.1%, and no other minority group constitutes more than 3% of total residents.

Median household income in O'Fallon is high at \$77,210, well above the State of Missouri median of \$47,333, according to the 2008-2012 American Community Survey. Unemployment in O'Fallon has typically been below that of St. Louis County. The city's unemployment rate was at about 4% prior to the recession, and grew to over 7% by 2009, then dropped to around 5% by 2013. According to 2012 estimates, educational services, health care, and social assistance employees represent the largest shares of workers (21.7% of the total) in St. Charles County, which includes the City of O'Fallon.

Protected Class Analysis

The City of O'Fallon is, and has historically been, considerably less diverse than St. Louis County. Black residents made up 4.0% of the population as of 2010, Asians made up 3.1%, and Hispanics constituted 2.7%. At the tract level, no racial or ethnic concentrations exist in O'Fallon. No tract is more than 10% African American or 6% Hispanic. According to the 2008-2012 American Community Survey, 3.9% of O'Fallon residents were not native to the United States, well below the national foreign born population rate of 12.8%. No tract had a concentration of non U.S. native residents.

As of the 2010 Census, 44.2% of O'Fallon households included children, down from 52.3% in 2000. Female householders made up 23.3% of total households, an increase of 150.4% from the previous Census.

The 2008-2012 ACS data shows that 8.6% of the County's population has a disability. The majority (63.9%) of that group are under age 65.

The 2010 U.S. Religion Census: Religious Congregations & Membership Study indicates that 51.7% of St. Charles County's population adheres to a religion. Catholics make up the largest share of the population at 23.7%, followed by Evangelical Protestants (20.0%). Religious composition is not available below the county level.

Segregation Analysis

Four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation were used in this study. A reconciliation of the four indices has shown that, in O'Fallon, the low level of diversity citywide (88.2% of the population is non-Hispanic White) means that minority residents tend to have high exposure to Whites, while Whites have low exposure to minorities. Residential patterns within O'Fallon are similar regardless of race or ethnicity, resulting in low levels of segregation. At the tract-level, diversity is low but shows little variation throughout the city.

Public Investment & Infrastructure

Several interstate highways connect the St. Louis region, and I-70 and I-64 run through O'Fallon. Public transit does not serve O'Fallon, and lack of transit accessibility was mentioned frequently among stakeholders and survey respondents as an issue for some protected class members. Increasing regional connectivity was also identified as a key theme for the East-West Gateway Council of Government's OneSTL plan.

The quality of public schools within a community can also be a primary driver of housing choice. O'Fallon is served by three public school districts; for all three, graduation rates were above the statewide rate as of 2013.

Access to Areas of Opportunity

This analysis uses HUD-provided data to evaluate relative opportunity levels on six neighborhood dimensions (poverty, school proficiency, labor market engagement, jobs access, transit access, and health hazards exposure). Comparisons are also made between opportunity level for residents by race and ethnicity. In O'Fallon, access to opportunity is not related to race/ethnicity – White, Black, and Hispanic residents tend to live in areas with similar levels of opportunity. Labor market engagement, health hazards exposure, and transit access are even throughout O'Fallon, while school proficiency is slightly higher in southern parts of the city. Jobs access and poverty levels vary citywide.

Land Use & Zoning

O'Fallon's zoning code was reviewed against a set of fair housing criteria and assigned a risk score (1=low risk; 3=high risk) indicative of its potential to result in housing discrimination. The city's overall risk score was 1.61, indicating a moderate risk of its zoning and land use regulations contributing to discriminatory housing treatment or impeding fair housing choice. Among the provisions with greatest risk for restricting housing choice are those concerning the means by which persons with disabilities may make modifications to their homes and provisions restricting the placement of substance abuse facilities.

Housing Profile

According to the 2008-2012 ACS estimates, O'Fallon contained a total of 29,261 housing units, of which the majority were single-family detached units (75.4%); the homeownership rate was 82.9%. Vacancy rates in the city were substantially lower for ownership units (2.1%) than for rental units (9.0%). The vast majority of O'Fallon's housing stock was constructed since 1979, reflecting the rather recent growth of this suburban area.

Because many protected classes tend to have lower than average incomes, housing affordability becomes an important aspect of fair housing choice. HUD considers housing affordable if it costs less than 30% of a family's income. In O'Fallon, 38.6% of renters have a cost burden, compared to 21.9% of owners. The National Low Income Housing Coalition's *Out of Reach* 2014 Annual Report calculates the amount of income a household must receive in order to afford a rental unit at the Fair Market Rent (FMR) without spending over 30% of income. A renter at the mean renter income in St. Charles County (the smallest geography for which data is available) would need to keep rent costs at or below \$542 to avoid a cost burden.

Fair Housing Organizations & Activities

O'Fallon is served by several local fair housing, affordable housing, and homeless service organizations, among them the Equal Housing Opportunity Council (EHOC), Legal Services of Eastern Missouri, and Catholic Charities. Activities include fair housing testing, complaint

investigation, fair housing education, transitional housing, rent and mortgage assistance, and other housing-related assistance. Survey responses indicate that additional fair housing education may be needed in the study area, as less than half of participants (43.1%) indicated knowing their fair housing rights. Few respondents (9) experienced housing discrimination, but of those that did only 20% reported it.

Housing Discrimination Complaints

Based on responses from fair housing agencies for the 2009-2014 reporting period, 31 discrimination complaints were received in O'Fallon. Among the complaints received by the Missouri Commission on Human Rights (MCHR), allegations of discrimination based on color/race were the most common (15 complaints), although a basis was not listed for all complaints. A "no cause" finding was issued in 10 of the 27 complaints received by MCHR; two were settled with benefits and one resulted in successful conciliation.

Housing Discrimination Lawsuits

A review of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between 2005 and May 2014 within O'Fallon revealed no suits filed in or against the city. In nearby St. Louis County, there were 5 lawsuits with substantial bearing on the availability of fair housing choice. The cases reviewed tend to involve three fair housing issues: (1) discriminatory lending practices that targeted a protected class; (2) occupancy limits and restrictive definitions of "family"; and (3) prohibiting residential occupancy permits for persons who cannot provide proof of citizenship or legal residency.

Impediments and Recommendations

Impediments identified through this research are summarized below 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 barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment: Imbalance Between Job Centers and Affordable Housing Options

Compared to other communities in the study area, in O'Fallon, there is relatively little available affordable housing. The rapid growth of O'Fallon and St. Charles County has occurred at the same time that North St. Louis County has declined in population and economic prosperity. Much of the economic expansion in O'Fallon has been as a result of the construction of higher cost housing and the retail infrastructure that supports households with higher incomes. As a result, the City contains many service-sector jobs, but the lack of affordable housing makes it difficult for people holding these jobs to live in proximity to them. Because there isn't adequate affordable housing for the City's workforce, the housing options for lower-wage workers tend to be limited.

Recommendations:

The construction of new affordable and/or mixed-income housing would accomplish the goal of increased economic opportunity and greater standard housing available for a more diverse population. A Housing Market Analysis should be prepared for O'Fallon to provide reliable information to guide public policymakers and private investors in determining whether and where affordable and/or mixed-income housing projects are feasible, what types of public and private financing would be needed, and a potential timeline for development.

Density bonuses, fee waivers or other incentives for development of workforce or mixed-income housing could spur investment and development. Finally, education for city council members and other local leaders on the benefits of providing a range of housing options, including housing for the local workforce could result in additional support for these initiatives.

Impediment: NIMBY/Prejudiced Attitudes

Segregation between Black and White residents of the study area is high (dissimilarity index value of 0.71) and remained unchanged between 2000 and 2010. Whereas studies of other communities outside the St. Louis region tend to reveal declining levels of racial and ethnic segregation, the issue in this study area appears to be persistent. Public input and comments received through the Fair Housing Survey conducted in conjunction with this AI reveal that some residents of the study area hold strong "Not In My Back Yard" (NIMBY) sentiments as well as attitudes prejudiced against people of low-income, those residing in subsidized housing, and racial/ethnic minorities.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Segregatory living patterns and prejudiced personal beliefs and attitudes create negative impacts on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of the value of diversity and integration is especially important (this was also recommendation 1.1 in the OneSTL FHEA). The local governments within the study area should continue to support and work with organizations (such as InvestSTL) dedicated to promoting diversity throughout metro St. Louis and St. Louis County.

Collaborating with the assigned HUD Office of Fair Housing and Equal Opportunity and/or with local fair housing advocacy organizations, the entitlement communities should develop an appropriate diversity and sensitivity awareness 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.

A separate campaign to educate local leaders and elected officials in St. Louis County jurisdictions and in O'Fallon regarding the economic benefits of diversity should be developed, and they should be encouraged to participate in countywide or regional initiatives. The campaign should identify

and publicize local examples of success, such as that of the Brentwood School District which has taken a deliberate approach of embracing diversity.

Impediment: Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements

While O’Fallon’s zoning code was not determined to be restrictive relative to its “family” definition, many other municipalities in the study area were found to have definitions that unreasonably restrict the number of unrelated people permitted to live together in a housing unit. In these jurisdictions, the impact of the restrictive definitions found in local zoning codes is amplified by occupancy permitting requirements. Communities in the study area commonly require that a permit be obtained from the municipal government for the number of persons occupying a housing unit. O’Fallon requires an occupancy permit and inspection for rental housing units, but the permit is not based on the number of people occupying a housing unit. While the occupancy permitting policy is intended to ensure the quality of the city’s rental housing stock, it also gives the city the ability to control, by approval or denial of a permit, who may live in their jurisdiction, expressly limiting fair housing choice.

Recommendations:

The entitlement communities should explore the opportunity to partner with a local university for a review of occupancy permit requirements, family definitions, and zoning ordinances (including regulations regarding group homes and residential treatment centers) in all St. Louis County jurisdictions and in O’Fallon. This work could be led by a professor with research support from public policy or planning graduate students. When the review is complete, the results should be presented to a panel of community representatives, representing various stakeholder groups (including planners, zoning officials, fair housing advocates, and advocates for immigrants) who should then advocate ordinance revisions where appropriate.

Impediment: Limited Housing Options for People with Disabilities

In both the sample set of municipal zoning codes reviewed as part of this AI and in the review of fair housing-related lawsuits for jurisdictions in the study area, ordinance and policy provisions often restricted housing choice for people with disabilities. In half of the zoning codes reviewed, a spacing requirement was imposed between group homes for people with disabilities. Such requirements, when applied to housing for people with disabilities but not to housing types occupied by others, has potential to violate the Fair Housing Act. Of the zoning codes reviewed none provided a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Further, the codes in the sample set also restricted residential treatment facilities only to non-residential zones. Under federal law, it is discriminatory to deny an individual or entity the right to site a treatment program in a residential zone because it will serve individuals with alcohol or other drug problems. Particularly in Florissant and St. Louis County, the age of the housing stock also may limit the availability of housing units

accessible to people with disabilities, as older housing units are less likely to have been built to modern accessibility or visitability standards.

Recommendations:

It is recommended that St. Louis County, Florissant, and O'Fallon meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. For housing developments with public funding, prioritize those that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Regarding reasonable accommodation standards, model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These models should be compiled by a regional organization and advocated to local municipalities.

Impediment: Need for Alternative 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 reverse is true as well. A lack of transportation options limits the selection of housing to neighborhoods within walking or biking distance of employers and disproportionately affects low-income, disabled, and elderly residents.

There is no system of public transportation serving O'Fallon or greater St. Charles County. Public input received in the process of developing this AI repeatedly cited the lack of transportation alternatives as an important factor limiting the housing choices of people either living or working in O'Fallon. It was not uncommon for participants to share the view that, for people without a personal vehicle, living in O'Fallon simply was not a viable choice.

Recommendations:

The City's Public Assistance Department should routinely review transportation planning efforts carried out by other City 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.

It is recommended that the City convene a group of service providers, Planning & Development staff, business leaders, and other local stakeholders to identify top transit needs (e.g. connections to the City of St. Louis, to St. Louis County, to job centers in general, or simply transit within O'Fallon, etc.), level of need, and locations of transit dependent populations in O'Fallon. If improved connectivity with St. Louis is identified as a need, the City is advised to meet with a Metro representative to determine what role it may play.

Given the size of O'Fallon, a full-scale public transit system is unlikely to be feasible, however there are intermediate options (such as demand-response systems, vanpools, and transit management organizations) that could provide needed connections for the City's residents and workforce. A survey of similarly-sized suburban cities should be conducted to identify successful transit programs in comparable jurisdictions.

Introduction

Equal access to housing choice is a cornerstone principle of America's commitment to equality and opportunity for all. Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. 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. The U.S. Department of Housing and Urban Development (HUD), and specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and enforcement of the Fair Housing Act and other civil rights laws.

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.³ A fair housing study, known as an Analysis of Impediments to Fair Housing Choice (AI), is required of HUD grantees, such as St. Louis County and the Cities of Florissant and O'Fallon, receiving funds under the Community Development Block Grant (CDBG) program. To perform this Analysis of Impediments, the grantees contracted with WFN Consulting.

St. Louis County (consisting of unincorporated County and 78 municipalities participating in the CDBG program), the City of Florissant, and the City of O'Fallon (in neighboring St. Charles County) participate together in a Consortium for the purpose of accessing federal affordable housing funds under HUD's Home Investment Partnerships Act (HOME) program. Because of the collaborative affordable housing planning undertaken by the Consortium, the members sought to jointly conduct this AI to provide a streamlined regional approach to fair housing and to identify and address impediments to fair housing choice that often do not strictly follow jurisdictional boundaries.

The regional approach to fair housing planning embodied in this AI makes smart use of limited resources and results in an analysis of fair housing policy for governments and organizations throughout the region. By conducting a regional analysis, the communities represented by the Consortium will have the informational basis from which to promote fair housing choices for all persons, 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. By analyzing and taking actions to address identified impediments, the members of the Consortium can meet their obligations and certifications to HUD to affirmatively further fair housing.

³ 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.

Definitions & Data Sources

Definitions

Affirmatively Further Fair Housing – In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with “the 1968 Fair Housing Act’s obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability or familial status.”⁴

Fair Housing Choice - In carrying out its Analysis of Impediments to Fair Housing Choice, the Consortium utilized the following definition of “Fair Housing Choice”:

- 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 adapted from the *Fair Housing Planning Guide*, impediments to fair housing choice are understood to include: ⁵

- 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.

Protected Classes - In carrying out its Analysis of Impediments to Fair Housing Choice, the Consortium utilized the following definition of Protected Classes:

- 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 local definitions of the term may vary, the definition used throughout this analysis is congruent with HUD’s definition:

- HUD defines as "affordable" 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.

⁴ U.S. Department of Housing and Urban Development. “HUD Publishes New Proposed Rule on Affirmatively Furthering Fair Housing Choice.” Press Release No. 13-110. July 19, 2013..

⁵ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

- Housing affordable to a low-income family of four (income up to 80% of the area median income) residing in the study area would carry a total monthly cost not exceeding \$1,384 as reported by the National Low Income Housing Coalition's 2013 *Out of Reach* data.

Data Sources Used in This Analysis

Decennial Census Data – Data collected by the Decennial Census for 2010 and 2000 is used in this Assessment (older Census 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:

- 2010 and 2000 Census 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. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block level.
- 2000 Census Summary File 3 (SF 3) – Containing sample data from approximately one in every six U.S. 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. The SF 3 dataset was discontinued for the 2010 Census; therefore, SF 3 data from the 2000 Census was the only tract-level data source available for some variables.

American Community Survey (ACS) – The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single-year estimates and multi-year estimates.

- 2012 ACS 1-Year Estimates – Based on data collected between January 2012 and December 2012, these single-year estimates represent the most current information available from the U.S. Census Bureau, however; these estimates are only published for geographic areas with populations of 65,000 or greater.
- ACS Multi-Year Estimates – More current than Census 2010 data and available for more geographic areas than the ACS 1-Year Estimates, this dataset is one of the most frequently

used. Because sampling error is reduced when estimates are collected over a longer period of time, 5-year estimates will be more accurate (but less recent) than 3-year estimates. ACS datasets are published for geographic areas with populations of 20,000 or greater. The 2008-2012 ACS 5-year estimates are used most often in this assessment.

Previous Works of Research – This AI is supported by, and in some cases builds upon, previous works of significant local research conducted for or within the St. Louis region. These include the following:

- Analysis of Impediments to Fair Housing Choice in St. Louis County, Unincorporated Areas of St. Louis County, Florissant, St. Charles County, O’Fallon, and St. Peters – This 2009 document was prepared by the RegionWise Research Center in the Department of Public Policy and the Law Clinic of St. Louis University. The study is the immediate predecessor to this AI and assesses fair access to housing throughout each geography, and identifies impediments to housing choice. Elements include demographic and economic analyses, assessments of mortgage lending, housing complaints and fair housing resources, an identification of impediments, and recommendations for overcoming these impediments.
- St. Louis County Housing Study – This May 2012 study was prepared by Development Strategies for the St. Louis County Office of Community Development and the East-West Gateway Council of Governments. The study focuses on affordable housing in St. Louis County and its role in countering poverty. Foreclosures as well as the condition and quality of the county’s rental housing stock are specifically analyzed.
- OneSTL – Many Communities. One Future. – Coordinated by the East-West Gateway Council of Governments, this collaborative December 2013 report is the outcome of the region’s \$4.7 million award under HUD’s Sustainable Communities Regional Planning Grant program. The plan outlines a vision for a prosperous, healthy, and vibrant St. Louis region and identifies resources for achieving the vision.
- OneSTL Fair Housing Equity Assessment – Prepared by the Metropolitan St. Louis Equal Housing Opportunity Council, this July 2013 assessment addresses issues of racial disparities and access to opportunities throughout the St. Louis region. The study involves data analysis, evaluation, and engagement of data so as to inform strategy development and planning for more inclusive and sustainable communities.

Stakeholder Engagement

Fair Housing Survey – This survey was designed to collect input from a broad spectrum of the community and received responses from residents across the study area. The survey consisted of 32 distinct questions, allowing a mixture of both multiple choice and open-ended responses. In all, there were 57 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 assessment, it

refers only to the percentage of respondents to the particular question being discussed and may not be a percentage of the full 57 survey respondents. Surveys were received over a 43-day period, from April 7, 2014 to May 19, 2014. 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 and posted on the websites of Consortium members and at www.stlouisfairhousing.com, a site designed for the AI project. A Spanish translation of the same survey was also made available in hard copy and online. The Spanish version of the survey did not receive any responses.

Project Website - To promote the Analysis of Impediments process with local residents and other stakeholders, WFN Consulting prepared a website dedicated to the project (www.stlouisfairhousing.com). The site included an overview of the project, the public meeting schedule, links to English and Spanish versions of the fair housing survey, an opportunity to provide comments, and links to more information about fair housing. The site was included in public meeting notices, advertised at public meetings, and provided in email correspondence with stakeholder interview participants. The site had 294 unique visitors during the project period, and one comment was received through it.

Stakeholder Interviews – Key community stakeholders were identified, contacted, and interviewed either individually or in small groups as part of this Analysis. These stakeholders included elected officials, representatives of nonprofit organizations, municipal and county staff, fair housing advocates, lenders, and real estate agents. Other stakeholders not belonging to any of these groups were occasionally interviewed as dictated by the course of research carried out for this Analysis. More than 30 stakeholder interviews were conducted.

Public Meetings – Five public meetings were held in order to provide forums for residents of the study area and other interested parties to contribute to this AI. Meeting dates, times, and locations are listed below. Meetings were held both during the day and in the evenings in various locations across the region, providing a variety of options for residents to attend. These meetings were advertised via flyers and emails distributed by the Consortium members using their various email distribution lists. The format of these meetings ranged from small-group roundtable discussions to moderated forums. In several cases, AI education and input opportunities were added to the agendas of existing community meetings and workshops. Notes were taken of the public comments at all meetings.

Public Kickoff Meeting
(St. Louis County & Florissant)
St. Louis County Building
Clayton, MO
Tuesday, April 8, 2014
2:00 p.m.

Florissant Neighborhood Meeting

(in conjunction with the City's annual Home Improvement Program Seminar)

Florissant Government Building

Florissant, MO

Tuesday, April 8, 2014

6:00 p.m.

O'Fallon Neighborhood Meeting

O'Fallon City Hall Gymnasium

O'Fallon, MO

Tuesday, April 8, 2014

6:00 p.m.

Public Kickoff Meeting

(O'Fallon)

O'Fallon City Council Chambers

O'Fallon, MO

Wednesday, April 9, 2014

2:00 p.m.

Lemay Neighborhood Meeting

(in conjunction with the Broadway & Ripa Public Input Meeting)

Maria Center at the School Sisters of Notre Dame

Lemay, MO

Wednesday, April 9, 2014

6:00 p.m.

Limitations of this Analysis

This Analysis of Impediments to Fair Housing Choice was prepared by WFN Consulting for St. Louis County, the City of Florissant, and the City of O’Fallon. This report seeks to analyze the current fair housing climate in the region, identify impediments to fair housing choice and equity, and set forth recommended strategies for overcoming the identified impediments. Some of the impediments identified in this report will require additional research and on-going analysis by entities within the region. This report does not constitute a fair housing action plan or any other type of community plan, however, it should be a key resource to inform such plans as they are developed.

HUD’s primary guidance for developing Analyses of Impediments is found in the Fair Housing Planning Guide, published in 1996. Since that time, HUD’s approach to fair housing has greatly evolved and formal guidance has largely yet to catch up. In 2013, HUD released a new proposed rule titled “Affirmatively Furthering Fair Housing” that outlines significant changes to the development of local fair housing studies. Because this proposed rule has yet to be finalized, the methodology and components of this AI, to the greatest extent possible, meet both the revised criteria of the proposed rule as well as the traditional AI requirements found in the Fair Housing Planning Guide.

Large portions of this analysis rely upon Census data reported at the census tract level. Census tracts do not follow municipal boundaries, meaning the tracts used may include both residents and non-residents of the subject municipality. Erring on the side of inclusivity, this research considered data from all census tracts containing even a portion of the subject municipality. By this approach, every resident of the municipality is represented, along with some who reside outside the city limits. The authors found this preferable to methodologies that would have excluded non-residents at the expense of also excluding some residents of the subject municipality.

Though licensed attorneys with land use and fair housing experience have participated in the research contained herein, no portion of this Analysis shall constitute or be relied upon as legal advice or as a legal opinion.

Throughout this analysis, the authors have made careful decisions regarding which datasets to use. The choice of a dataset often involves tradeoffs between criteria. For example, more recent datasets often have a limited number of data variables available for analysis. Additionally, there is the unavoidable tradeoff between geographic and socio-economic detail (less detailed data for smaller geographies) that sometimes restricts the availability of data. Also, the detailed definitions of data variables can change over time limiting their comparability.

Finally, all source data used in the preparation of this analysis, whether from national sources (e.g. the U.S. Census Bureau), local sources (e.g. the OneSTL plan), or from proprietary sources (e.g. the National Low Income Housing Coalition’s *Out of Reach* report) is assumed to be accurate.

Historical Overview

An Introduction to St. Louis County, Missouri

St. Louis County covers an area of 524 square miles, had a 2000 Census population of 1,016,300 and a 2010 population of 998,954 and the U.S. Bureau of Census estimated the 2012 population at 1,000,473.⁶ The County is an integral part of the St. Louis Metropolitan Statistical Area (MSA), which was redefined in June 2003 to consist of eight counties in Missouri and eight counties in Illinois.⁷

St. Louis County had 16.7% percent of the state's 2010 population, 48 percent of the jobs in the St. Louis Metropolitan Area, and 23 percent of the jobs in the State of Missouri.⁸

St. Louis County contains 91 municipalities which have primary responsibility within their jurisdictions for such services as public safety, planning and zoning, local street maintenance and building code enforcement. The unincorporated area, which contains nearly a third of the County's population and a third of its area, comes under the direct jurisdiction of County government. The City of St. Louis has been totally separated from St. Louis County since 1876 under a revision to the Constitution of the State of Missouri.⁹

The County's has 24 independent public school districts, 23 fire protection districts, which share fire protection responsibilities with the 20 municipal fire departments. Special service districts provide sewer, library, junior college and cultural facilities within the County. Privately owned utilities provide electrical, natural gas, water and telephone service.¹⁰

St. Louis County History: Early History/Formation of the County¹¹

The City of St. Louis was founded by French settlers from New Orleans in 1764 in what was then nominally Spanish territory, having been transferred from France to Spain by the Treaty of Paris at the end of the French and Indian War. The area that is now the City of Florissant became the first permanent European settlement in the area that is today's St. Louis County.

The United States purchased the land that is now St. Louis County from France as part of the Louisiana Purchase in 1803. This action by President Thomas Jefferson represented one of the most important steps in the formation of the Nation.

⁶ U.S. Bureau of Census, <http://quickfacts.census.gov/qfd/states/29/29189.html>

⁷ St. Louis County Department of Planning, Research and Statistics Division, "St. Louis County, Missouri 2007-2012 Fact Book," 2012, Pages i, iv.

⁸ St. Louis County Department of Planning, Research and Statistics Division, Page i.

⁹ St. Louis County Department of Planning, Research and Statistics Division, Pages i, iv.

¹⁰ St. Louis County Department of Planning, Research and Statistics Division, Pages i, iv.

¹¹ St. Louis County Genealogical Society, "History of Saint Louis County," http://www.stlgs.org/index.php?option=com_content&view=article&id=57&Itemid=62

St. Louis County was formed on October 1, 1812 as one of the counties organized by Governor William Clark out of the five administrative districts of the Upper Louisiana Territory. As originally formed, St. Louis County included the area that is now St. Louis City, St. Louis County, Jefferson County and Franklin County. Franklin and Jefferson Counties were created from parts of the original St. Louis County in 1818.

Missouri became the 24th state on August 10, 1821 after Congress passed the “Missouri Compromise” in 1820, admitting Missouri as a slave state and Maine as a free state. The agreement also prohibited slavery in the Louisiana Territory north of Missouri’s southern border, except in the proposed State of Missouri.¹²

St. Louis County History: City/County Separation or “The Great Divorce”¹³

In 1872, a Taxpayers’ League was formed by city leaders who were displeased with the County’s taxation policies. At a time when the City had large expenses in extending urban infrastructure to its rapidly growing population, they felt that the non-urban parts of the County were an undue burden on City taxpayers.

The State of Missouri revised its Constitution in 1875 to give the City of St. Louis the right to formulate its own home rule charter and extend its city limits. The revised Constitution also authorized the formation of a Board of Freeholders, which served as the mechanism that was used to separate the City from the rest of St. Louis County.

The separation of St. Louis City from St. Louis County occurred in 1876, increased the size of the City from 17.98 square miles to 61.37 square miles, leaving St. Louis County at its present size of 524 square miles. The newly separated County had a population of 31,888, and while including a few small urban centers, was predominantly rural. Clayton was selected as the County seat in 1877.

St. Louis County Geography

St. Louis County is located on the eastern side of the State of Missouri with a portion of its eastern border shared with the City of St. Louis.

Rivers define much of the County’s borders, with the Missouri River dividing St. Louis County from St. Charles County on the north; and, the Mississippi River separating parts of eastern St. Louis County from the following Illinois counties; Madison, St. Clair, and Monroe.

St. Louis County shares a southern border with Jefferson County, Missouri and a western border with Franklin Border.

¹² The Library of Congress, “Today in History, August 10,” <http://memory.loc.gov/ammen/today/aug10.html>

¹³ St. Louis County Department of Planning, Research and Statistics Division, “St. Louis County, Missouri 2007-2012 Fact Book,” 2012, Page 148.

Residents of St. Louis County had median household income of \$58,485 in 2012 which was higher than the \$47,333 figure for the State of Missouri.¹⁴

City of Florissant

The City of Florissant is located in northern St. Louis County and consists of 12.56 square miles of land area. Florissant had an estimated 2012 population of 52,252, which is slightly higher than the Census 2010 population of 52,158. In 2010, Florissant was the 12th largest city in the State of Missouri.¹⁵

Paleo-Indian people, the earliest known inhabitants of the Florissant area, arrived in the Florissant area near the end of the last ice age in the period 9500-8900 BCE. These people lived a nomadic settlement lifestyle subsisting on hunting of animals and gathering edible plants. From that period until the period that Europeans moved into the area, various Native American cultures populated the Florissant region.¹⁶

The exact date that the first European settlers came to the place now known as the City of Florissant is not known. It is known that Florissant was organized as a civil government in 1786 as the Village of San Fernando (Saint Ferdinand) by Francois Dunegant and a group of French settlers.¹⁷

At the time of settlement by the French, the territory was still under Spanish rule. Originally, the village was known as “Fleurissant” or “Blooming” by the French and ‘St. Ferdinand’ by its Spanish rulers.

The town was incorporated as a municipality in 1829 and has been closely associated with religious activities throughout its history. Blessed Mother Philippine Duchesne was an early settler, founding a novitiate and an Indian school. The St. Stanislaus Seminary also opened in Florissant in 1823.

The City of Florissant residents had estimated 2012 median household income of \$51,529¹⁸, compared with \$58,485¹⁹ for St. Louis County and \$47,333²⁰ for the State of Missouri.

Money Magazine ranked the City of Florissant in the top 100 Best Places to live in 2012, listing the city at number 73.²¹

¹⁴ U.S. Bureau of Census, <http://quickfacts.census.gov/qfd/states/29/29189.html>

¹⁵ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/2924778.html>

¹⁶ City of Florissant,
http://www.florissantmo.com/egov/documents/51f3731a_a173_098a_72c4_311420909e5f.pdf

¹⁷ Missouri History Museum, “Florissant, Missouri Collection, 1790-1971,”
<http://collections.mohistory.org/resource/103021.html>

¹⁸ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/2924778.html>

¹⁹ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/29189.html>

²⁰ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29000.html>

²¹ Money Magazine, September 2012, <http://money.cnn.com/magazines/moneymag/best-places/2012/top100/index3.html>

City of O'Fallon

The City of O'Fallon is located in St. Charles County in eastern Missouri approximately 35 miles west of downtown St. Louis. The city occupies 29.19 square miles of land area.²²

The town began when Arnold Krekel, a German immigrant, invested in property now located in what became downtown O'Fallon and which would become a depot stop for the North Missouri Railroad. Arnold Krekel never moved to O'Fallon.²³

Arnold Krekel's younger brother Nicholas came to what is now the City of O'Fallon in 1856, when he became the first resident and retailer. Mr. Krekel operated a store from his home, which was the first house constructed in O'Fallon. One year later Mr. Krekel became the first postmaster and railroad agent.²⁴

The City of O'Fallon was incorporated in 1912 with a population of approximately 600 residents. By 2000 the City had grown to 46,169 residents, which increased to 79,329 in Census 2010 and to an estimated 81,979 in 2012.²⁵

O'Fallon is a municipality with residents having median household income of \$77,210 in 2012²⁶, while the same measure for St. Charles County was \$71,416²⁷ and \$47,333²⁸ for the State of Missouri.

Money Magazine listed the City of O'Fallon in the top 100 Best Places to live in 2012, ranking the city number 39.²⁹

The maps which follow show counties in the State of Missouri on one map, followed by a map highlighting the boundaries for St. Louis County and the City of Florissant; and, St. Charles County and the City of O'Fallon.

²² U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/2954074.html>

²³ City of O'Fallon, 2008 Comprehensive Plan, Page 7.

²⁴ City of O'Fallon, 2008 Comprehensive Plan, Page 7

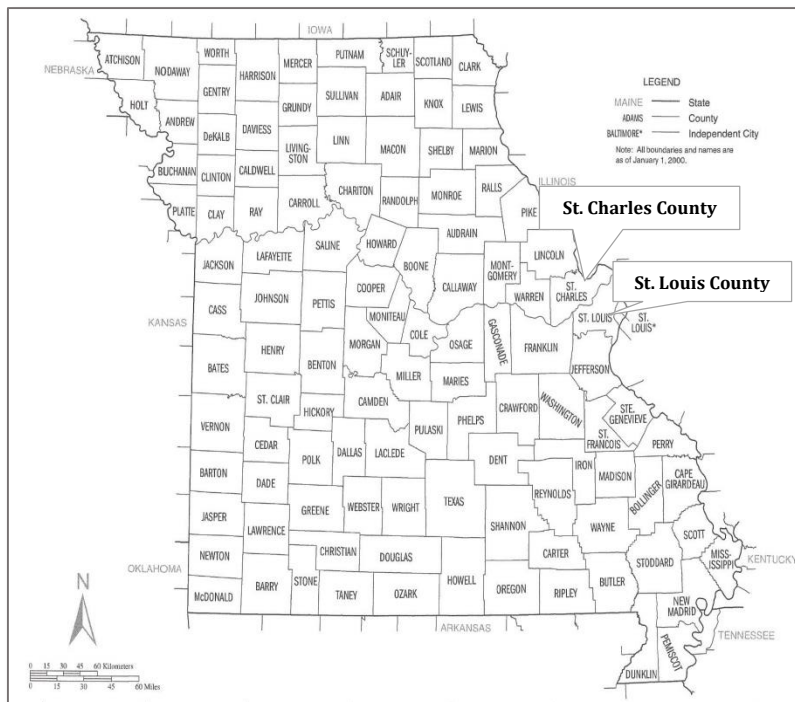
²⁵ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/2954074.html>

²⁶ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/2954074.html>

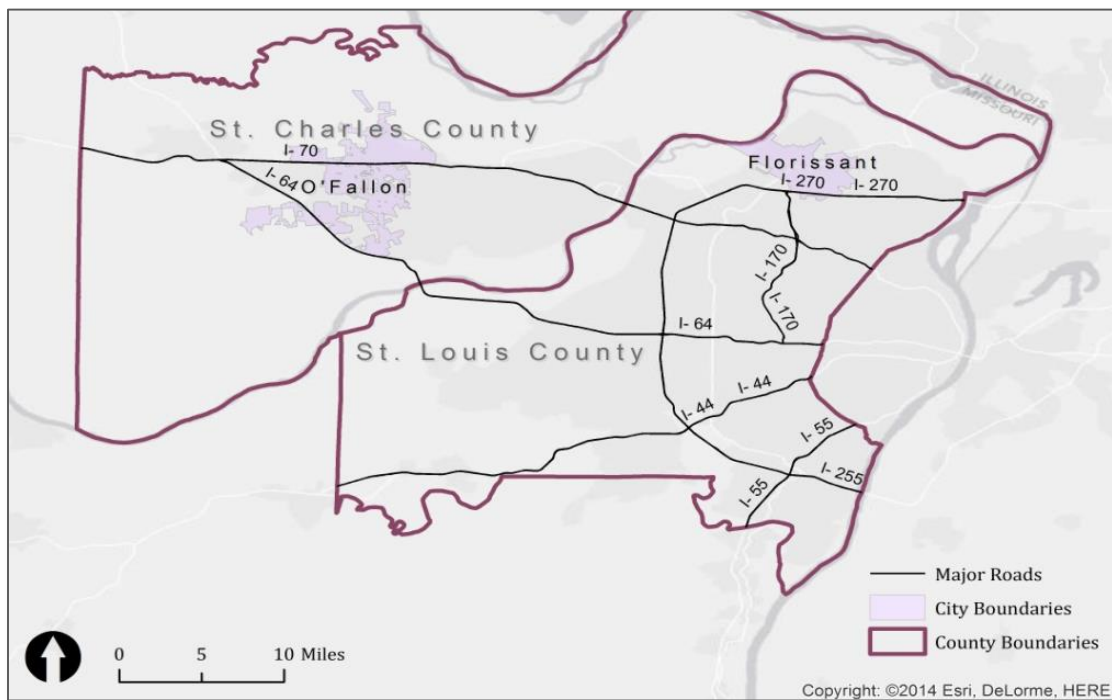
²⁷ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29/29183.html>

²⁸ U.S. Bureau of Census, QuickFacts, <http://quickfacts.census.gov/qfd/states/29000.html>

²⁹ Money Magazine, September 2012, <http://money.cnn.com/magazines/moneymag/best-places/2012/top100/index3.html>



Source: U.S. Census Bureau



History of Segregation – St. Louis Region

To understand patterns of segregation in the St. Louis region, one must look at how segregation began in the City of St. Louis, and its influence on political jurisdictions located in St. Louis County.

Much has been written by scholars and journalists about the segregation of races in the St. Louis area, tracing the present patterns of segregation to the creation of the State of Missouri. At that time, the St. Louis region was located in a border state that permitted slavery but was also a state which harbored deep disagreements over the practice of slavery. The disagreement among residents of Missouri over permitting or prohibiting slavery made the state a battleground in words and actions during the Civil War.

The United States Congress sought to preserve the balance of power between Free states and slave states by passing the Missouri compromise in 1820, which admitted Missouri to the Union as a slave state and Maine as a Free state. With the exception of Missouri, the law prohibited slavery in the Louisiana territory north of the 36° 30" latitude line. The Missouri compromise was repealed by the Kansas-Nebraska Act of 1854. Only three years later, the Supreme Court declared the Missouri compromise unconstitutional in its Dred Scott decision which ruled that Congress had no authority to prohibit slavery in the territories.³⁰

With the end of Reconstruction in 1877 and with the rise of the Ku Klux Klan in the South, many southern Blacks migrated north to cities such as St. Louis. Some of these individuals were known as "Exodusters," who arrived in 1879, and who received that name as a result of their exodus to what many believe to be a "promised land."³¹ These individuals feared that the end of Reconstruction and the removal of the protection from the United States Army might result in them losing their newly found rights or worse, being returned to slavery. While many "Exodusters" moved to the plains of western Kansas, eastern Colorado, and southern Utah, others stopped in St. Louis to make their homes.

In the "Preservation Plan for the City of St. Louis," the patterns of racial segregation and segregation and housing were described in a section entitled "The African-American Experience." The plan notes that segregated housing patterns were not a result of "coincidence or happenstance." In St. Louis, like many other urban areas, African-Americans lived in separate areas that tended to contain substandard housing and which were frequently overcrowded and unsanitary.³²

The Preservation Plan explained that the boundaries of areas populated largely by African-Americans were legally established under a segregation ordinance approved by voters in 1916

³⁰ "Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

³¹ "Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

³² "Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

which held that no individual could move to a block on which more than 75% of the residents were of the same race. The ordinance was nullified as result of legal actions brought by the NAACP. Responding to the nullification of the segregation ordinance, whites created associations of whites living in neighborhoods near black residential areas. One example is the Marcus Avenue Improvement Association where each property had attached to it a fifty-year covenant that prohibited the sale of the house to “persons not of Caucasian race.” In 1948, the United States Supreme Court ruled in *Shelley v. Kramer*, a St. Louis case, that such covenants which limited access to or ownership of property due to race violated the 14th Amendment to the Constitution.³³

The City of St. Louis Preservation Plan also notes that segregated housing was reinforced by urban renewal practices in the construction of public housing. Urban renewal projects in the city were undertaken in several areas which contained concentrations of African-Americans. Mill Creek Valley was an African-American district from the mid-1800s through the end of the 19th century. Approximately ninety-five percent of the 20,000 people who lived in this area were African-American. Under a city urban renewal project which began in 1959, public works improvements were constructed in this area and residents were displaced.³⁴

To accommodate the poorest displaced residents, the St. Louis Housing Authority continued its construction of public housing on the Northside, which reinforced racial segregation. The NAACP described the demolition of structures in Mill Creek Valley as the “Negro removal project.”³⁵

Dr. Colin Gordon, a history professor at the University of Iowa wrote a book in 2008 entitled Mapping Decline: St. Louis and the Fate of the American City. Interviewed on August 26, 2014 by Robert Siegel on the National Public Radio program “All Things Considered,” Dr. Gordon addressed recent racial tensions in the City of Ferguson, which is located in St. Louis County.³⁶

In the interview, Dr. Gordon remarked that many northern industrial cities such as St. Louis, Chicago, and Detroit, for example, are much more segregated than cities in the South. He explained that these patterns of racial separation were partly a reaction to in-migration of African-Americans, notably during the first and second world wars.

Dr. Gordon explained that in a setting like the St. Louis area, in-migration that took place in this manner has resulted in an African-American Northside and a largely white Southside.

³³ “Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

³⁴ “Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

³⁵ “Preservation Plan for St. Louis, Part I: Historic Context; 8 – The African-American Experience, <https://www.stlouis-mo.gov/government/departments/planning/cultural-resources/preservation-plan/Part-I-African-American-Experience.cfm>

³⁶ Interview with Dr. Colin Gordon, “All Things Considered,” National Public Radio, August 26, 2014

Municipalities began to be incorporated in St. Louis County in 1843 when Bridgeton was created. Other municipalities incorporated during the 19th century included Florissant and Pacific in 1857, Kirkwood in 1865, Fenton in 1874, Ferguson in 1894, and Webster Groves in 1896. The remainder of the 90 municipalities were created from 1900 and through 1970.

Some of the municipalities were created through the incorporation of neighborhoods or subdivisions. Documentation does not always exist that describes the reasons for the creation of these municipalities, but at the time of their incorporation, some of the cities may have been created as points of civic pride, to provide services at a level closer to their residents, or to avoid annexation by other cities.

The new cities consisted predominantly of white residents who had previously lived in the City of St. Louis. At the time of the creation of many of these jurisdictions, legal barriers (especially exclusionary zoning ordinances requiring larger and more expensive housing), sometimes resulted in African-Americans who had lower incomes than whites being excluded from purchasing real estate in these municipalities. Other acts that occurred through the years that prohibited African-Americans from successfully purchasing housing in suburban cities included discrimination in real estate sales and the approval of real estate loans.

While the legal barriers to residency have been removed many years ago, other tools were used to continue the practice of segregated housing in the region. St. Louis has the sad distinction of being the location where the practice of “redlining” was born.

Redlining involved lenders and real estate companies identifying areas of minority concentrations (African-Americans) where they would not sell or finance properties. These areas were marked on maps with red borders, which gave the practice its name. Redlining made it more difficult for African-Americans to obtain mortgages or business loans in these areas. Because loans were denied to African-Americans, redlining restricted their ability to own or improve properties already owned. As a result of redlining, many black residents remained locked in their communities unable to gain wealth by owning homes.

BusinessWeek magazine published an article authored by Peter Coy on its website on August 15, 2014, in which it examined racial issues in St. Louis County, and particularly in the city of Ferguson. The article notes that the fragmentation caused by so many municipalities has resulted in small towns that are highly stratified by race and income. According to *BusinessWeek*, “as African-Americans move into town, whites move out.” These circumstances may result in a shrinking of the city tax base and the resultant reduction in the amenities that were previously available. The article highlights how small municipalities compete with each other for revenues and with shrunk tax bases it is becoming increasingly difficult for these jurisdictions to survive.³⁷ The debate over consolidation of governments continues as a way to reduce the number of municipalities the

³⁷ BusinessWeek, August 15, 2014; <http://www.businessweek.com/articles/2014-08-15/how-st-dot-louis-countys-map-explains-fergusons-racial-discord>

simplify governance and as a possible avenue to help reduce segregation. However, at this time no proposal has been offered to voters for a decision.

Another volatile political issue that has arisen in some suburban St. Louis County municipalities is the rapid change in demographics. Some cities which were predominantly white have transitioned to predominantly African-American, as former white residents have moved away, but the elected leadership and professional staff in these communities have not changed to reflect the new demographics. This phenomenon, while not limited to the St. Louis area, can be a source of friction in the cities, as experienced by the City of Ferguson in August 2014.

While this discussion has sought to describe the historical evolution of segregation in the A.I. study area, it is also appropriate to summarize the status of racial segregation in the St. Louis area. *U.S. News and World Report* published an article on August 22, 2014, which cited a 2011 Brown University study which determined that St. Louis is the ninth most segregated metropolitan area in the country. Other metropolitan area that are more segregated and their national rankings are:

Metropolitan Area Rank

- Detroit 1
- Milwaukee 2
- New York 3
- Newark 4
- Chicago 5
- Philadelphia 6
- Miami 7
- Cleveland 8³⁸

As if to punctuate the continuing issues caused by racial segregation, the St. Louis region was described in an August 15, 2014 article in the *Los Angeles Times*, which quoted Dr. Clarissa Hayward, Associate Professor of Political Science at Washington University. Dr. Hayward noted that “the St. Louis metropolitan area has been an extreme example of racial segregation for 100 years. St. Louis is the beginning of the West, the nexus to the Midwest and at the border of the South.”³⁹

³⁸ U.S. News and World Report, August 22, 2014; <http://www.usnews.com/news/articles/2014/08/22/fergusons-racial-problems-are-not-unique-to-ferguson>; and, Logan, John R. and Stults, Brian J., “The Persistence of Segregation in the Metropolis: New Findings from the 2010 Census,” Brown University, March 24 2011; Census Brief prepared for Project US2010; <http://www.s4.brown.edu/us2010/Data/Report/report2.pdf>

³⁹ Los Angeles Times, August 15, 2014; <http://www.latimes.com/nation/nationnow/la-na-nn-ferguson-racial-history-20140815-story.html>
<http://www.latimes.com/nation/nationnow/la-na-nn-ferguson-racial-history-20140815-story.html>

Demographic Overview

Population Characteristics

As of the 2010 Census, St. Louis County was home to 998,954 people and 404,765 households. Over the previous ten years, the County lost 1.7% of its population, but gained a small number of households, reflecting a trend toward slightly smaller household sizes. Over 52,000 of the County's residents (5.2%) lived in Florissant as of 2010. Unlike the County, Florissant gained population between Censuses, adding 1,661 people and 848 households.

O'Fallon grew at a substantially faster pace than Florissant – its population expanded by 71.8% to reach 79,329 in 2010. Average household size (2.8) and median age (34.3) in O'Fallon reflect the greater prevalence of families with children in comparison to St. Louis County and Florissant, a trend further examined in the Protected Class section of this document.

Seniors make up a smaller share of the population in O'Fallon than they do in the other two geographies (8.9% versus 15.0-15.5%). Given the high correlation between age and increased rates of disability, these population shares indicate that disabilities are likely more common in the County and Florissant than in O'Fallon.

The large majority of the population in all three geographies are non-Hispanic Whites (68.2% to 88.2%). Blacks make up about one-quarter of the population in St. Louis County and Florissant, but only 4.0% in O'Fallon. No other race or ethnicity constitutes 4% or more of the population in any geography. Racial/ethnic composition is examined in greater detail in the discussion of Protected Classes beginning on page 57.

Population Overview for St. Louis County, Florissant and O'Fallon			
	St. Louis County	City of Florissant	City of O'Fallon
Population & Household Growth			
2000 Population	1,016,315	50,497	46,169
2010 Population	998,954	52,158	79,329
2000-2010 Population Change	(1.7%)	3.3%	71.8%
2000 Households	404,312	20,399	15,389
2010 Households	404,765	21,247	28,234
2000-2010 Household Change	0.1%	4.2%	83.5%
2000 Average Household Size	2.5	2.4	3.0
2010 Average Household Size	2.4	2.4	2.8

Population Overview for St. Louis County, Florissant and O'Fallon (continued)			
	St. Louis County	City of Florissant	City of O'Fallon
Population by Age (2010)			
Youth (under 18 years)	23.4%	23.9%	30.0%
Seniors (65 years or older)	15.0%	15.5%	8.9%
Median Age	39.9	38.0	34.3
Population by Race and Ethnicity (2010)			
Non-Hispanic	97.5%	98.0%	97.3%
White	68.9%	68.2%	88.2%
Black or African American	23.2%	26.6%	4.0%
Asian	3.5%	0.8%	3.1%
Other Races*	2.0%	2.5%	2.0%
Hispanic or Latino	2.5%	2.0%	2.7%
Total Population	100.0%	100.0%	100.0%

*Includes American Indians/Alaska Natives, Native Hawaiians/Pacific Islanders, Other races, and two or more races.

Sources: U.S. Census 2000 SF1 Tables P001, P017, and H003; U.S. Census 2010 SF1 Tables P5, P12, P13, H3, and H12

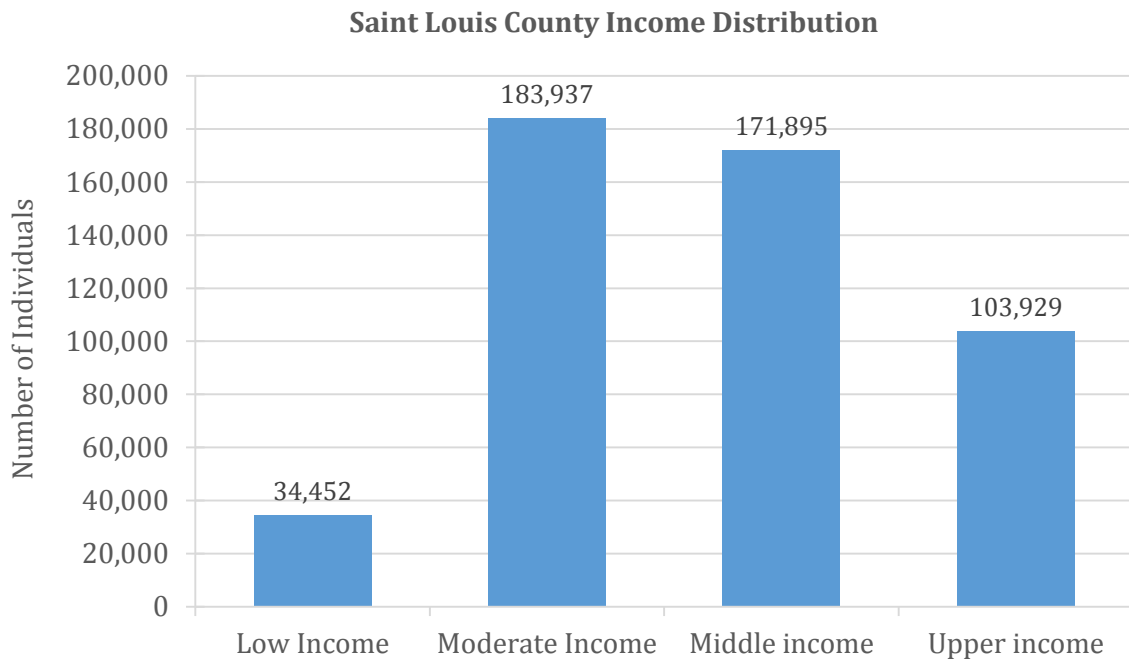
Economic Analysis

Household income is the most important measure of a household's ability to afford housing and other living expenses. Household income provides individuals and families with the ability to pay for food, shelter, clothing and other consumables as well as offering funds for savings or investments. A family's standard of living is determined by the spendable cash income received. Economic factors that influence a family's choice of housing are not by themselves fair housing issues. However, the connections among household income, household type, race/ethnicity, and other factors can influence misconceptions and biases that raise fair housing issues.

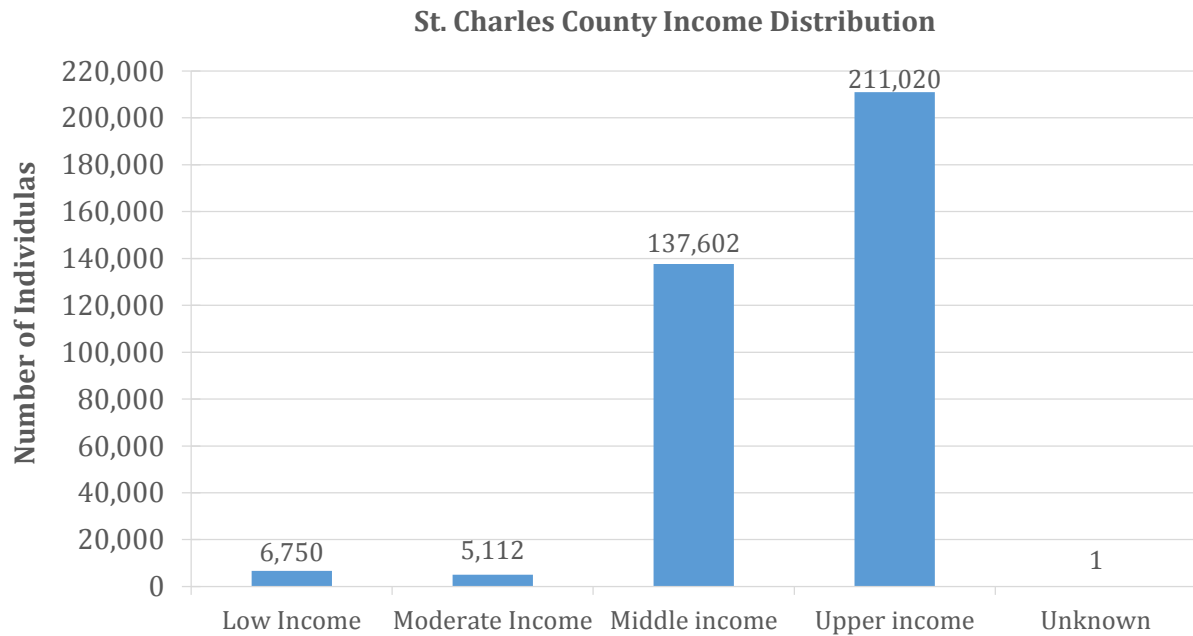
HUD has established the following income categories based on Area Median Income (AMI) St. Louis County and for St. Charles County:

- Low income (less than 50% AMI)
- Moderate (51%-79.99% AMI)
- Middle (80%-119.99% AMI)
- Upper (120% AMI and greater)

Each County's Census Tracts were sorted by these income ranges and the total individuals in each income category is displayed in the following figures.



Source: HUD FFIEC Data, 2013, www.ffiec.gov



Source: HUD FFIEC Data 2013, www.ffiec.gov

Family and Household Income

The following table compares Median Household Income and Per Capita Income for St. Louis County and for the Cities of Florissant and O'Fallon with similar measures for the State of Missouri and for the entire United States.

Median household incomes in St. Louis County, and the Cities of Florissant and O'Fallon was higher than the State of Missouri. St. Louis County and O'Fallon also experienced Median Household Incomes that were higher than the amount for the Nation.

Per capita Income incomes followed the same pattern as Median Household Income, with St. Louis County and O'Fallon having Per Capita Incomes that were higher than Missouri. However, these two jurisdictions had Per Capital Income that exceeded the figure for the Nation.

Comparison of Median Household Income and Per Capita Income, 2008-2012		
Jurisdiction	Median Household Income	Per Capital Income
St. Louis County	\$58,485	\$34,531
City of Florissant	\$51,529	\$25,838
City of O'Fallon	\$77,210	\$30,419
State of Missouri	\$47,333	\$25,546
United States	\$53,046	\$28,051

Source: U.S. Census Bureau; State and County Quickfacts

The following table contains median income for households by considering the type of head of household.

Median income for family households was \$73,585 in St. Louis County and \$81,417 in St. Charles County. By contrast, female-headed family households with no husband had median income of \$34,438 in St. Louis County and \$36,397 in St. Charles County. Median incomes for families with male householder with no wife were \$49,214 in St. Louis County and \$59,933 in St. Charles County.

Median Family Income by Household Type				
Household Type	St. Louis County		St. Charles County	
	Share of Total	Median Income	Share of Total	Median Income
Family Households				
Families	257,478	73,585	100,741	81,417
With own children under 18 years	42.6%	69,563	45.5%	84,298
With no own children under 18 years	57.4%	76,367	54.5%	79,049
Married couple families	71.0%	91,552	81.7%	92,679
Female householder, no husband present	22.8%	34,438	12.3%	36,397
Male householder, no wife present	6.3%	49,214	6.0%	59,933
Nonfamily Households				
Nonfamily households	144,240	34,367	36,741	38,313
Female householders	56.2%	29,828	57.6%	34,320
Living alone	49.8%	27,226	51.3%	31,524
Not living alone	6.4%	66,611	6.3%	60,278
Male householder	43.8%	40,942	42.4%	46,381
Living alone	35.7%	36,927	32.6%	38,415
Not living alone	8.1%	52,574	9.8%	77,533

Source: U.S. Census Bureau: American FactFinder; American Community Survey – One-Year Estimates, 2012; S1903 Median Income in the Past 12 Months

Having lower household income and per capita income serve as barriers to housing choice. Another result of having less income to pay for housing is the potential for less mobility, particularly if the household lives in an area with affordable housing which is without accessible and affordable transportation options. Low and moderate-income areas in St. Louis and St. Charles Counties are shown in maps at the end of this Economic Analysis.

Unemployment

The following tables contain information about unemployment in St. Louis County and in the cities of Florissant and O'Fallon from 2006-2013.

Each of the three jurisdictions were experiencing annual unemployment rates under 5.0% during the initial years of the recession (2006-2007). As the recession deepened in 2008 unemployment began to climb, reaching its highest levels in 2009 (St. Louis County – 9.1%; City of Florissant – 10.0%; City of O'Fallon – 7.5%). By the end of 2013, the unemployment rates (St. Louis County – 6.5%; City of Florissant – 6.8%) had fallen to levels slightly above those in 2008. Only in the City of O'Fallon was the unemployment rate (4.9%) lower in 2013 than in 2008.



Source: Missouri Economic Research and Information Center: Local Area Unemployment Status;
www.missourieconomy.org/indicators/laus/index.stm

Poverty

The Bureau of Census' most recent American Community Survey (ACS) estimates of poverty cover a five year period (2008-2012). According to this report, the percentage of all families in poverty during the past 12 months of the survey were: St. Louis County – 7.8%; City of Florissant – 5.8%; and, the City of O'Fallon – 3.3%. Comparable poverty percentages were 10.7% for the State of Missouri and 10.9% for the United States.

The following table presents information from the ACS about the families and persons in poverty in these three jurisdictions. In addition to the data for all families just described, St. Louis County, the City of Florissant, and the City of O'Fallon had the poverty percentages for all other reported subcategories that were lower than the State of Missouri and the Nation.

The highest poverty percentages in St. Louis County, the City of Florissant, and the City of O'Fallon were for female-headed households with only children under 5 years of age. The respective percentages were: St. Louis County – 34.4%; City of Florissant – 23.3%; City of O'Fallon – 33.3%.

Percentage of Families and People Whose Income Was Below the Poverty Level in the Past 12 Months					
Families and People	St. Louis County	Florissant	O'Fallon	Missouri	U.S.
All Families	7.8%	5.8%	3.3%	10.7%	10.9%
With related children under 18 years	13.2%	10.0%	3.9%	17.5%	17.2%
With related children under 5 years only	12.9%	11.3%	6.7%	20.6%	18.2%
Married couple families	2.8%	3.4%	1.5%	4.8%	5.4%
With related children under 18 years	4.2%	5.2%	0.8%	7.0%	7.9%
With related children under 5 years only	3.9%	5.8%	0.0%	7.0%	6.9%
Female householder, no husbands present	23.2%	12.5%	12.9%	32.0%	30.1%
With related children under 18 years	31.4%	17.4%	16.5%	41.3%	39.1%
With related children under 5 years only	34.4%	23.3%	33.3%	50.5%	46.6%
All People	10.5%	8.6%	3.9%	15.0%	14.9%
Under 18 years	15.6%	13.6%	4.5%	20.9%	20.8%
Related children under 18 years	15.3%	13.3%	4.3%	20.5%	20.5%
Related children under 5 years only	19.3%	20.1%	4.5%	25.5%	24.1%
Related children 5 to 17 years	14.0%	10.6%	4.2%	18.6%	19.2%
18 years and over	9.0%	7.2%	3.7%	13.1%	13.0%
18 to 64 years	9.6%	7.8%	3.7%	14.1%	13.7%
65 years and over	6.3%	4.8%	4.2%	8.9%	9.4%
People in families	8.7%	7.1%	3.0%	12.0%	12.4%
Unrelated individuals 15 years and over	18.8%	14.7%	11.0%	27.3%	25.9%

Source: U.S. Census Bureau: American FactFinder; American Community Survey – Five-Year Estimates, 2008-2012; DP03 Selected Economic Characteristics

Workforce and Industry

The following table presents workforce data, by industry group, for St. Louis County (including the City of Florissant) and for St. Charles County (including the City of O'Fallon). The majority of employees are private wage and salary workers (85.1% in St. Louis County and 87.1% in St. Charles County), and government jobs make up the second largest shares at 10.0% and 9.0%, respectively.

In terms of jobs by industry, educational services, health care and social assistance employees represented the highest numbers and percentages with 124,623 workers in St. Louis County (25.6% of the total) and 41,806 in St. Charles (21.7% of total).

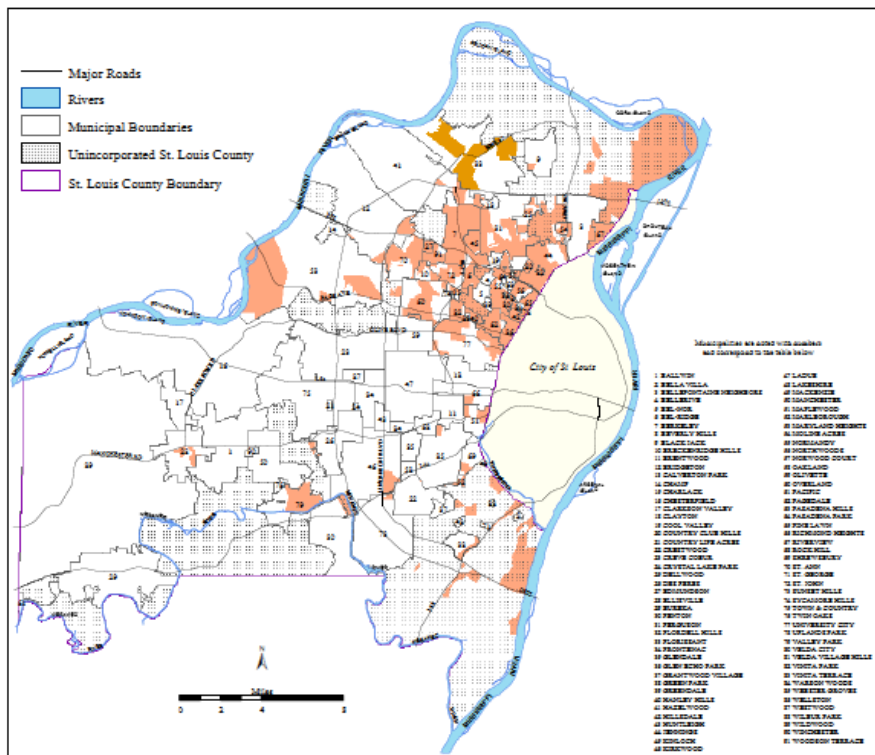
St. Louis County and St. Charles County Industry Sector Data				
Industry	St. Louis County		St. Charles County	
	Workers	Percent	Workers	Percent
Class of Worker				
Private Wage and Salary	415,059	85.1%	164,044	87.1%
Government Workers	48,727	10.0%	16,875	9.0%
Self-employed in own not incorporated business	23,519	4.8%	7,295	3.9%
Unpaid Family Workers	529	0.1%	219	0.1%
Total Private Industry	487,834	100.0%	188,433	100.0%
Civilian employed population 16 years and over	486,928	100.0%	192,884	100.0%
Agriculture, forestry, fishing & hunting, mining	2,387	0.5%	1,334	0.7%
Construction	19,680	4.0%	12,921	6.7%
Manufacturing	46,735	9.6%	26,577	13.8%
Wholesale trade	14,924	3.1%	6,646	3.5%
Retail trade	54,662	11.2%	24,342	12.6%
Transportation & warehousing, utilities	23,149	4.8%	8,593	4.5%
Information	11,927	2.5%	3,615	1.9%
Finance & insurance, real estate & rental & leasing	45,778	9.4%	18,543	9.6%
Professional, scientific, management, administrative & waste management services	58,759	12.1%	18,022	9.3%
Educational services, health care & social assistance	124,623	25.6%	41,806	21.7%
Arts, entertainment, recreation, accommodation & food services	44,716	9.2%	16,137	8.4%
Other services, except public administration	25,061	5.2%	8,721	4.5%
Public administration	14,527	3.0%	5,627	2.9%

Source: U.S. Census Bureau: American FactFinder; American Community Survey – One-Year Estimate, 2012;
S2405 Industry by Occupation for the Civilian Population 16 Years and Over

Local economic development organizations collected the data presented in the following table that lists the ten largest employers in St. Louis and St. Charles Counties. The areas where these employers are located are included on the maps which follow.

Major Employers in St. Louis and St. Charles Counties			
Rank	Company	Location	Employment
St. Louis County			
1	Boeing Defense, Space & Security	Hazelwood	15,129
2	Washington University in St. Louis	St. Louis	14,248
3	Mercy Health	St. Louis	12,489
4	SSM Health Care	St. Louis	11,898
5	Wall-Mart Stores Inc.	St. Louis	11,600
6	Schnuck Markets, Inc.	St. Louis	10,919
7	Enterprise Holdings	Clayton	5,770
8	Special School District of St. Louis County	Town & Country	5,672
9	Imo's Pizza	St. Louis	5,400
10	Edward Jones	Des Peres	4,754
St. Charles County			
1	Citi	O'Fallon	4,100
2	MasterCard Worldwide	O'Fallon	1,953
3	True Manufacturing	O'Fallon	Withheld
4	Verizon	Weldon Spring	1,400
5	General Motors	Wentzville	1,321
6	MEMC Electronic Materials	O'Fallon	1,000
7	The Boeing Company	St. Charles	1,000
8	Ameristar Casino	St. Charles	973
9	Client Services	St. Charles	838
10	Enterprise Holdings	Weldon Springs	722

Sources: St. Louis Regional Chamber, Major Employers – St. Louis MO-IL MSA, 9/18/2013, St. Charles County Economic Development Center, Major Employers, 2012; http://edcscc.com/dbh_major-employers.htm



St. Louis HOME Consortium
2011 - 2015 Consolidated Plan
St. Louis County
Department of Planning - OCD

ST. LOUIS COUNTY AND
THE CITY OF FLORISSANT
HUD CDBG LOW/MOD
ESTIMATES

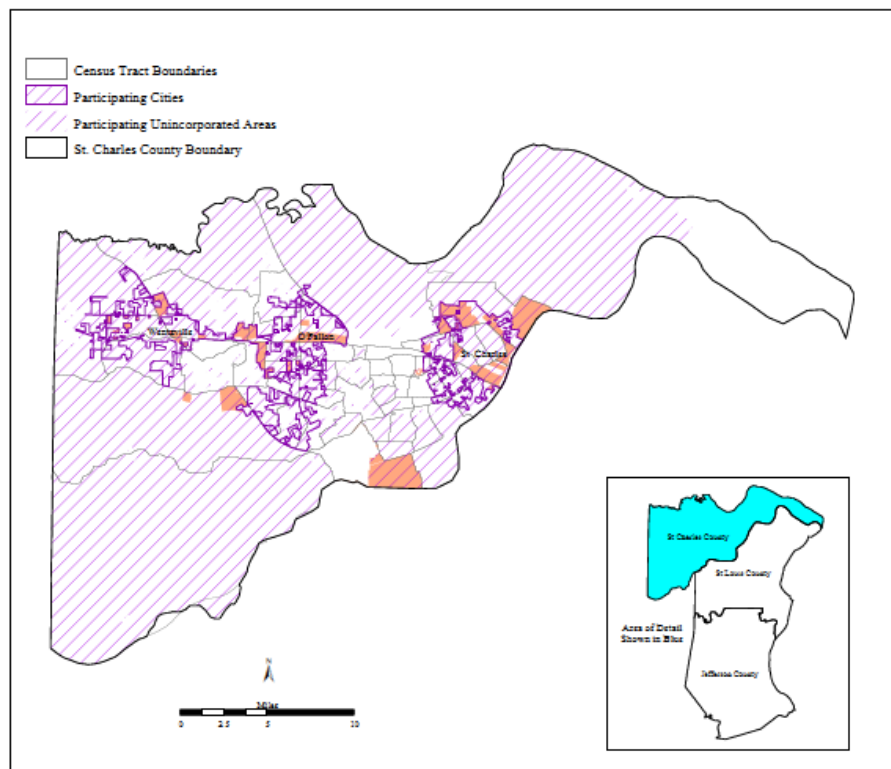
Eligible 2000 Census
Sub Block Groups

Source: U.S. Census 2000, Department of Housing and Urban Development 2000 Low - Mod Estimates for the St. Louis County and the City of Florissant Low and Moderate is defined as being at or below 80% of Median Family Income for the Metropolitan Statistical Area. Please note, this determination assumes at least 51% of the residents are Low and Moderate income persons as described in 24 CFR 570.209(a)(1)(i). Each jurisdiction has a unique threshold requirement for an area to qualify. Interested parties should consult with the local jurisdiction to determine area / project eligibility.

Prepared by the St. Louis County
Department of Planning, Office
of Community Development
August 2010



Source: St. Louis Home Consortium Consolidated Plan 2011-2014, page 370



St. Louis HOME Consortium
2011 - 2015 Consolidated Plan
St. Charles County
Department of Planning - OCD

ST. CHARLES COUNTY HUD
CDBG LOW AND MODERATE
INCOME ESTIMATES BY
CENSUS TRACT (SUMMARY
LEVEL 090), 2000

Eligible 2000 Census
Tracts Urban / Rural Split

Source: U.S. Census 2000, Department of Housing and Urban Development 2000 Low - Mod Estimates for St. Charles County. Low and Moderate is defined as being at or below 80% of Median Family Income for the Metropolitan Statistical Area. Please note, this determination assumes at least 51% of the residents are Low and Moderate income persons as described in 24 CFR 570.209(a)(1)(i). Each jurisdiction has a unique threshold requirement for an area to qualify. Interested parties should consult with the local jurisdiction to determine area / project eligibility.

Prepared by the St. Charles County
Department of Planning, Office
of Community Development
August 2010



Source: St. Louis Home Consortium Consolidated Plan 2011-2014, page 372

Protected Class Analysis

The Fair Housing Act and similar state or local fair housing laws list seven prohibited bases for housing discrimination:⁴⁰ race, color, national origin, gender, familial status, disability, and religion. This protected class analysis addresses each of these population groups and their geographic distribution in St. Louis County, the City of Florissant, and the City of O'Fallon.

Race and Ethnicity

As of 2010, the majority of St. Louis County's population was non-Hispanic White (68.9%) and about one-fifth (23.2%) was non-Hispanic Black. Taken together, Blacks and Whites made up 92.1% of the County's total population. Other minority segments included Asians (3.5%), Hispanics (2.5%), and persons of two or more races (1.7%). American Indians, Alaskan Natives, Native Hawaiians, Pacific Islanders, and persons of other races together made up only 0.3% of St. Louis County. Although most minority population shares remain low, the County has diversified since 2000, when 76.0% of its population was White. The biggest increases were in Hispanic and Asian residents, which grew by 71.7% and 53.2%, respectively.

Racial and ethnic composition of the population in Florissant is quite similar to that of the County. The most notable difference is that Asians make up 3.5% of St. Louis County but only 0.8% of Florissant. Florissant's racial and ethnic diversification over the 2000-2010 period surpassed that of the County – in the earlier year, Whites made up 84.8% of total population; by 2010, they made up 68.2%. The Black population grew most significantly over the ten-year period, by 8,114 persons, or 140.5%.

The City of O'Fallon is, and has historically been, considerably less diverse than St. Louis County. In 2010, 88.2% of O'Fallon's population was White. Largest minority populations included Blacks (4.0%), Asians (3.1%), and Hispanics (2.7%). Minority population growth rates in O'Fallon were high over the 2000-2010 period, due in large part to the very small populations in 2000. While both Florissant and St. Louis County lost White residents from 2000 to 2010, the White population in O'Fallon grew by 60.6%, just a bit below overall population growth.

⁴⁰ *Live Free: Annual Report on Fair Housing FY 2010*, U.S. Department of Housing and Urban Development.

Population by Race and Ethnicity in St. Louis County, Florissant and O'Fallon					
Race by Ethnicity	2000		2010		2000-2010 % Change
	Count	Share	Count	Share	
St. Louis County					
Non-Hispanic	1,001,738	98.6%	973,930	97.5%	-2.8%
White	772,041	76.0%	687,984	68.9%	-10.9%
Black or African American	192,544	18.9%	231,801	23.2%	20.4%
American Indian/Alaska Native	1,557	0.2%	1,632	0.2%	4.8%
Asian	22,492	2.2%	34,466	3.5%	53.2%
Native Hawaiian/Pacific Islander	223	0.0%	273	0.0%	22.4%
Other race	1,315	0.1%	1,187	0.1%	-9.7%
Two or more races	11,566	1.1%	16,587	1.7%	43.4%
Hispanic or Latino	14,577	1.4%	25,024	2.5%	71.7%
Total Population	1,016,315	100.0%	998,954	100.0%	-1.7%
City of Florissant					
Non-Hispanic	49,744	98.5%	51,129	98.0%	2.8%
White	42,807	84.8%	35,559	68.2%	-16.9%
Black or African American	5,775	11.4%	13,889	26.6%	140.5%
American Indian/Alaska Native	90	0.2%	109	0.2%	21.1%
Asian	302	0.6%	394	0.8%	30.5%
Native Hawaiian/Pacific Islander	15	0.0%	19	0.0%	26.7%
Other race	79	0.2%	81	0.2%	2.5%
Two or more races	676	1.3%	1,078	2.1%	59.5%
Hispanic or Latino	753	1.5%	1,029	2.0%	36.7%
Total Population	50,497	100.0%	52,158	100.0%	3.3%
City of O'Fallon					
Non-Hispanic	45,498	98.5%	77,170	97.3%	69.6%
White	43,576	94.4%	69,979	88.2%	60.6%
Black or African American	1,029	2.2%	3,135	4.0%	204.7%
American Indian/Alaska Native	96	0.2%	162	0.2%	68.8%
Asian	340	0.7%	2,485	3.1%	630.9%
Native Hawaiian/Pacific Islander	10	0.0%	40	0.1%	300.0%
Other race	40	0.1%	105	0.1%	162.5%
Two or more races	407	0.9%	1,264	1.6%	210.6%
Hispanic or Latino	671	1.5%	2,159	2.7%	221.8%
Total Population	46,169	100.0%	79,329	100.0%	71.8%

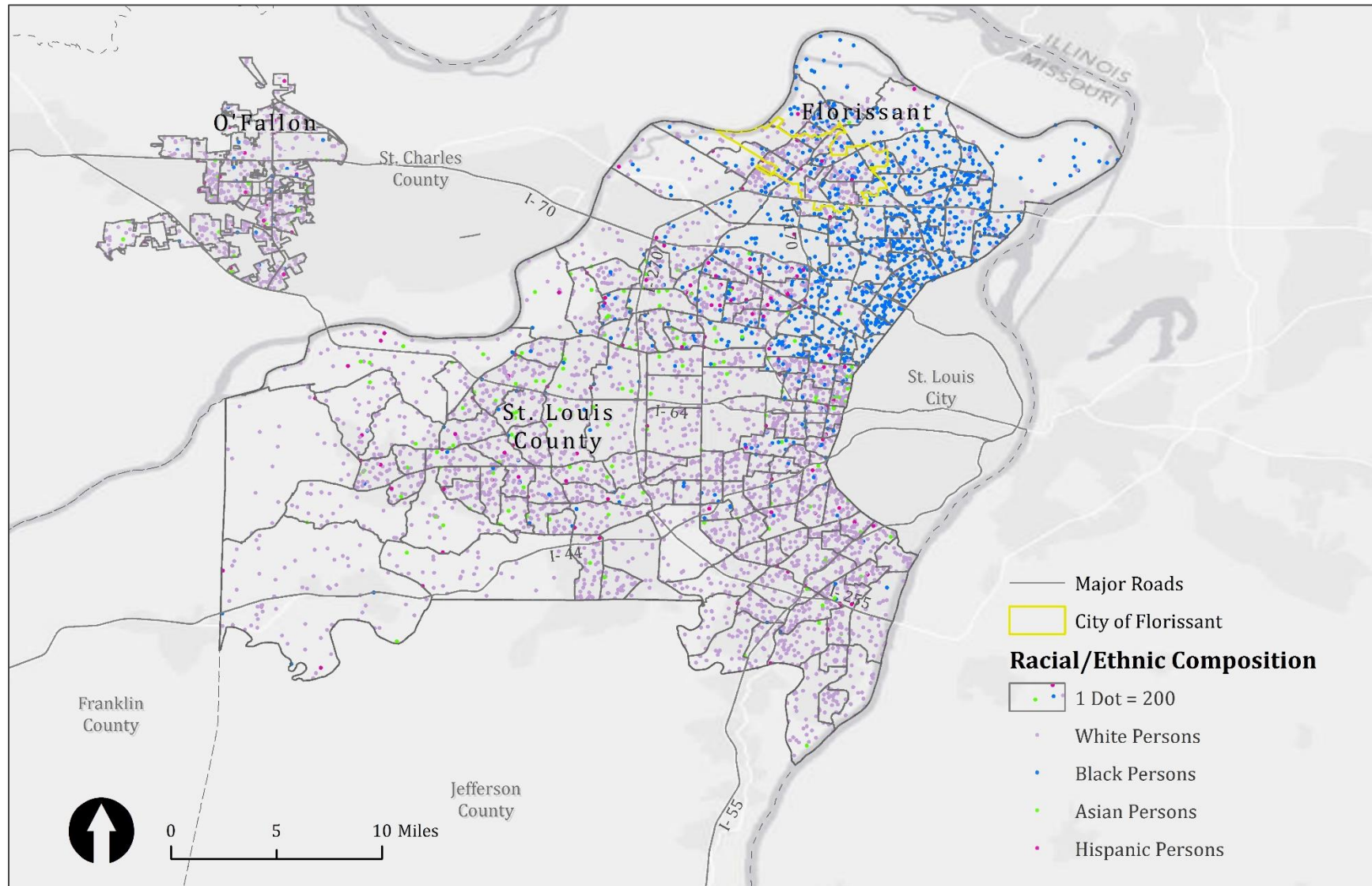
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

The maps on the following pages show the racial and ethnic composition of St. Louis County and O'Fallon and identify concentrations of minority residents there. Maps 1 and 2 indicate that the majority of St. Louis County's Black population lives in north St. Louis County, and that the majority of residents in north St. Louis are Black. Twenty-six census tracts in this area have Black populations of 80% or higher, and together they comprise 44.2% of the African American population countywide. Jurisdictions covered by these tracts include Glasgow Village, Jennings, Black Jack, Castle Point, Moline Acres, Country Club Hills, Berkeley, Kinloch, Wellston, Henley Hills, Flordell Hills, Pasadena Park, Bel-Ridge, and Pagedale. Only 7 tracts south of I-64 had a Black population of over 10% and, as the following map shows, no other racial/ethnic minorities make up a large share of south St. Louis County.

The share of African American residents in Florissant census tracts ranges from below 10% in the center of the city, to 40-56% in several tracts along the city's northern and eastern borders. No O'Fallon census tract is more than 10% African American, not surprising given the low level of racial diversity there.

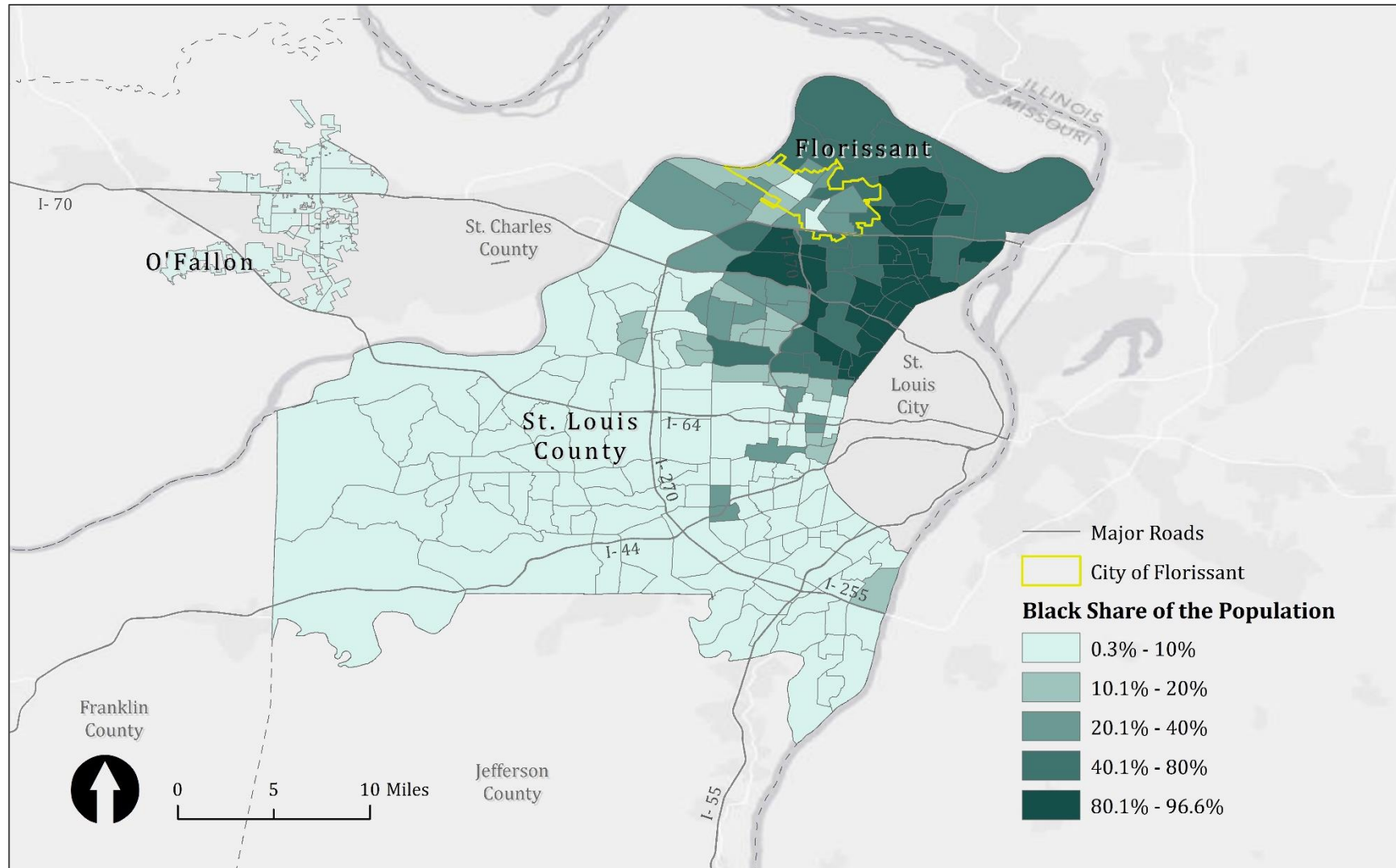
The map on page 41 identifies concentrations of Hispanic residents in St. Louis County and O'Fallon. Only 13 tracts are more than 6% Hispanic. Of these, ten are located adjacent to one another, southwest of the I-70 and I-170 interchange, in the municipalities of Breckinridge Hills, Woodson Terrace, St. Ann, Overland, Charlack, Edmundson, and St. John. This area is home to 17.4% of St. Louis County's Hispanic population, compared to 5.4% of the County's overall population. No tracts in O'Fallon are more than 6% Hispanic.

Racial/Ethnic Composition by Census Tract in St. Louis County, Florissant & O'Fallon, 2010



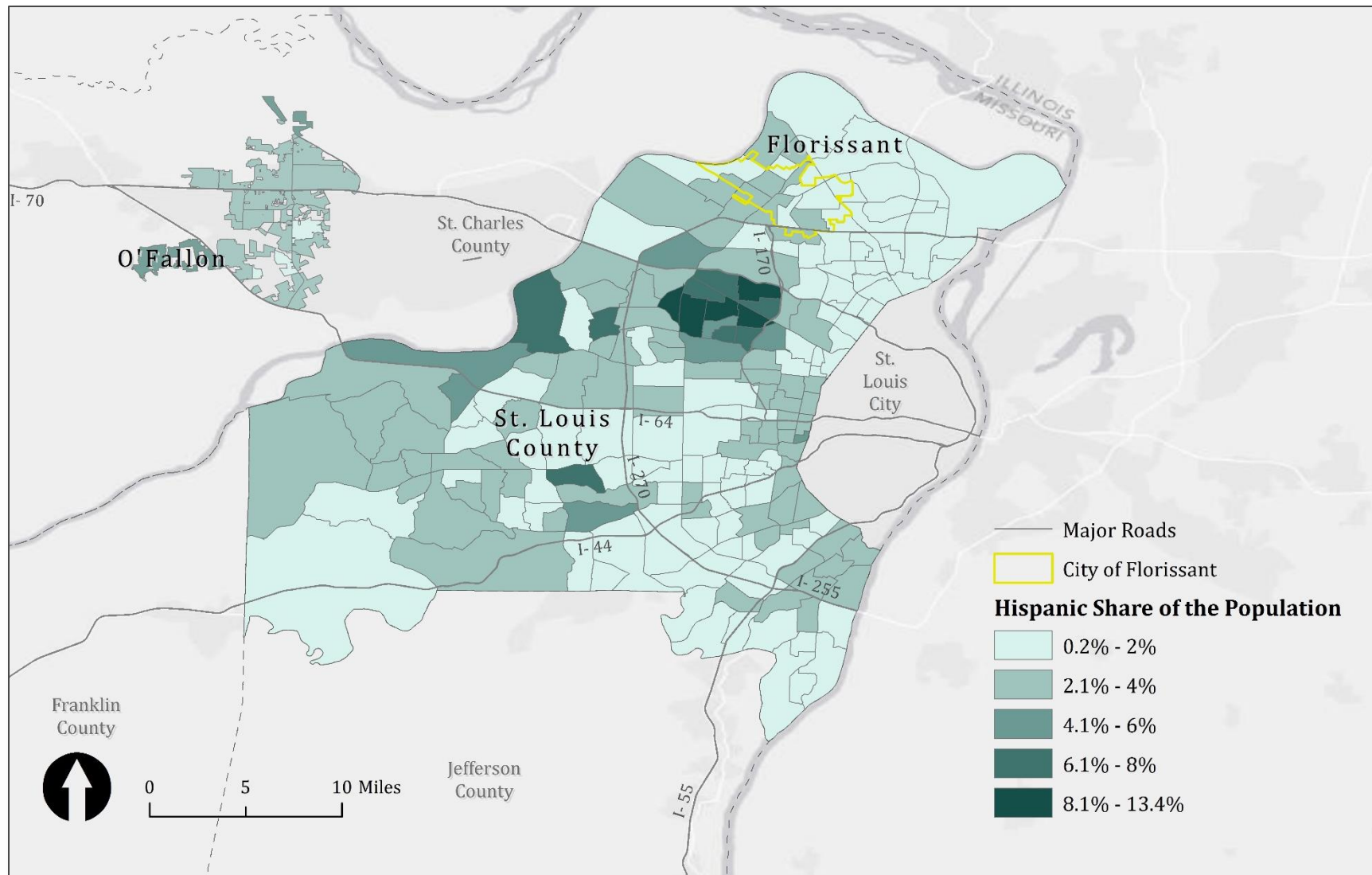
Source: U.S. Census 2010 SF1 Table P5

Black Share of the Population by Census Tract in the St. Louis County, Florissant & O'Fallon, 2010



Source: U.S. Census 2010 SF1 Table P5

Hispanic Share of the Population by Census Tract in St. Louis County, Florissant & O'Fallon: 2010



Source: U.S. Census 2010 SF1 Table P5

National Origin

According to the 2008-2012 American Community Survey, 6.8% of St. Louis County residents were not native to the United States, well below the national foreign born population rate of 12.8%. The largest share of foreign-born County residents were from Asia (44.6%), followed by Europe (30.0%). While Latin Americans make up about half of the foreign-born population nationwide, they constitute only 15.5% of St. Louis County's non-U.S. natives. A closer examination of nativity data indicates that there were 6,740 St. Louis County residents born in Bosnia/Herzegovina as of the 2008-2012 ACS, or 10.1% of the County's total foreign-born population. This concentration is well above those at the state (4.4%) or national (0.3%) levels.

Both Florissant and O'Fallon had lower levels of foreign-born residents than St. Louis County. In Florissant, 2.2% of the population was not born in the U.S., with the largest share being from Asia (39.2%). In O'Fallon, 3.9% of the population was born outside the U.S., the majority from Asian (63.3%).

Since 2000, the foreign-born populations in St. Louis County and Florissant grew by rates of 56.6% and 67.6%, respectively. O'Fallon saw more rapid growth, as its 968 foreign-born residents more than tripled to 3,064 from 2000 to 2008-2012.

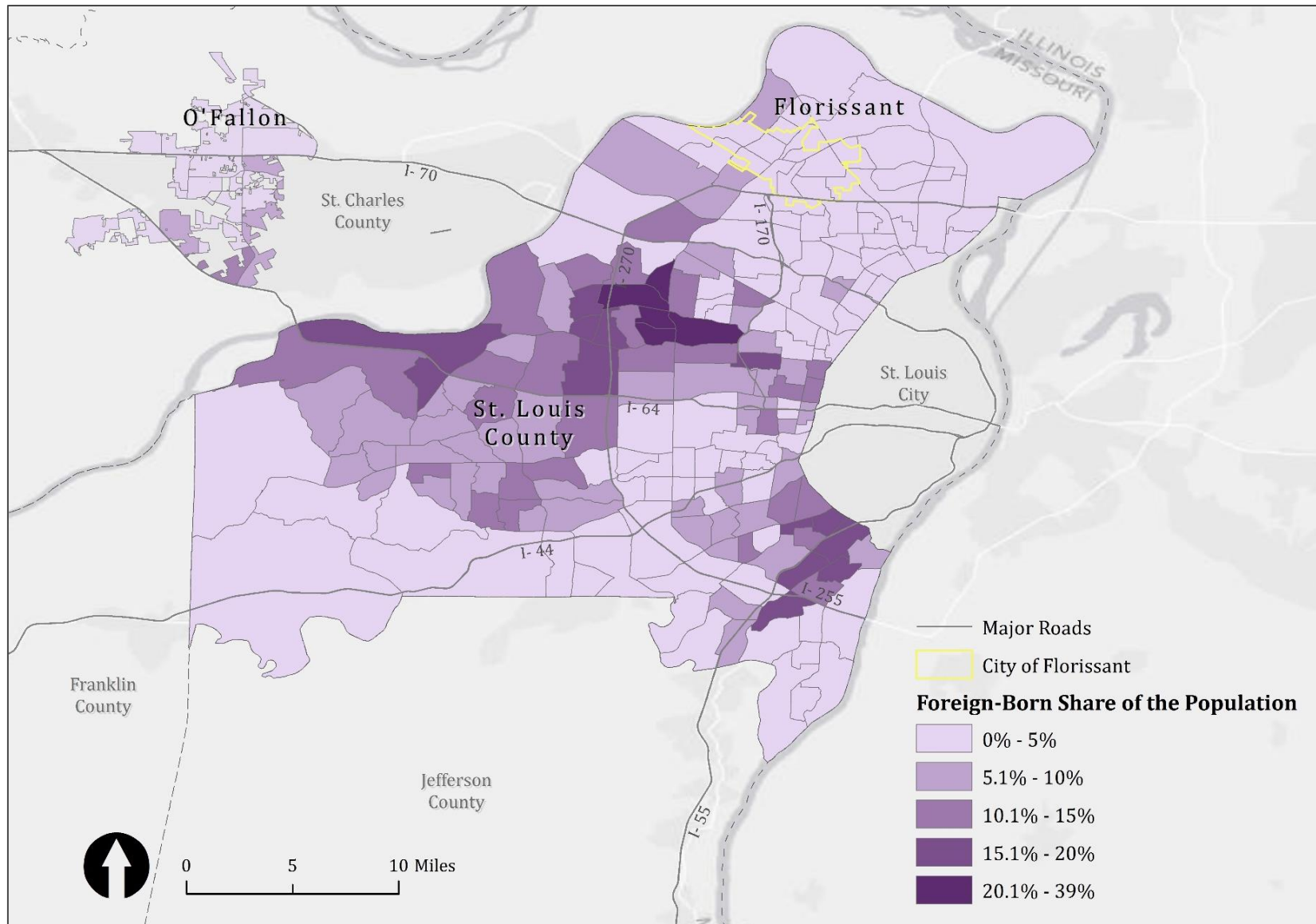
As the proceeding map shows, the highest concentration of foreign-born persons is located in five adjacent census tracts to the east of I-270, covering portions of Maryland Heights, Overland, Olivette, Creve Coeur, and unincorporated St. Louis County. According to tract-level ACS data, persons from India, Eastern Europe (including Belarus and Russia), China, and Central America make up the majority of immigrants living in this area. As the "Segregation Analysis" will show, these tracts are some of the most diverse countywide.

Least diversity in terms of national origin is seen in northern St. Louis County (including Florissant, Spanish Lake, and Ferguson) and southern St. Louis County (including Wildwood, Eureka, Fenton, Sunset Hills, and Oakville). Foreign born residents made up less than 5% of the population in each of these areas, and in most of O'Fallon, with the exception of the tracts on its western and southern edges.

National Origin of Foreign Born Population in St. Louis County, Florissant and O'Fallon					
National Origin	2000		2008-2012		Percent Change
	Count	Share	Count	Share	
St. Louis County					
Europe	14,042	32.9%	20,086	30.0%	43.0%
Asia	18,886	44.2%	29,812	44.6%	57.9%
Africa	2,306	5.4%	4,599	6.9%	99.4%
Oceania	312	0.7%	483	0.7%	54.8%
Americas	7,156	16.8%	11,901	17.8%	66.3%
Latin America	5,270	12.3%	10,399	15.5%	97.3%
Northern America	1,886	4.4%	1,502	2.2%	-20.4%
Foreign Born Population	42,702	100.0%	66,881	100.0%	56.6%
Foreign Born as Share of Total Population	4.2%		6.8%		
City of Florissant					
Europe	191	28.4%	189	16.8%	-1.0%
Asia	239	35.5%	442	39.2%	84.9%
Africa	11	1.6%	186	16.5%	1590.9%
Oceania	7	1.0%	99	8.8%	1314.3%
Americas	225	33.4%	212	18.8%	-5.8%
Latin America	180	26.7%	187	16.6%	3.9%
Northern America	45	6.7%	25	2.2%	-44.4%
Foreign Born Population	673	100.0%	1,128	100.0%	67.6%
Foreign Born as Share of Total Population	1.3%		2.2%		
City of O'Fallon					
Europe	421	43.5%	482	15.7%	14.5%
Asia	356	36.8%	1,938	63.3%	444.4%
Africa	8	0.8%	102	3.3%	1175.0%
Oceania	11	1.1%	28	0.9%	154.5%
Americas	172	17.8%	514	16.8%	198.8%
Latin America	89	9.2%	354	11.6%	297.8%
Northern America	83	8.6%	160	5.2%	92.8%
Foreign Born Population	968	100.0%	3,064	100.0%	216.5%
Foreign Born as Share of Total Population	2.1%		3.9%		

Sources: U.S. Census 2000 SF3 Table PCT019 and 2008-2012 5-Year American Community Survey Table B05006

Foreign Born Population by Census Tract in St. Louis County, Florissant & O'Fallon: 2008-2012



Source: 2008-2012 5-Year American Community Survey Table B05006

Familial Status & Householder Gender

As of the 2010 Census, there were 404,765 households in St. Louis County, of which nearly two-thirds (65.1%) were families.⁴¹ About half of families and one-third of total households (31.0%) included children. Twenty-two percent of family households and 58.3% of non-family households had female householders, together totaling 140,055 female householders (or 34.6% of total households).

An analysis of changes in household types in St. Louis County between 2000 and 2010 indicates a drop in married couple households, most notably of those with children. Over that ten year period, the number of married couple households with children fell by 16,808, a 16.0% decline, compared to a 3.3% national decline. Numbers of other household types (single householders with and without children and nonfamily households), meanwhile, grew by rates ranging from 5.3% to 28.2%. These trends indicate growing diversity in terms of household type in St. Louis County.

Familial Status and Sex of Householder in St. Louis County					
Household Type	2000		2010		2000-2010 % Change
	Count	Share	Count	Share	
Family Households					
Married couple householders	206,240	51.0%	189,432	46.8%	-8.1%
With related children under 18	95,392	23.6%	80,161	19.8%	-16.0%
No related children under 18	110,848	27.4%	109,271	27.0%	-1.4%
Male householder, no wife	13,077	3.2%	16,338	4.0%	24.9%
With related children under 18	7,267	1.8%	8,887	2.2%	22.3%
No related children under 18	5,810	1.4%	7,451	1.8%	28.2%
Female householder, no husband	51,493	12.7%	57,653	14.2%	12.0%
With related children under 18	34,281	8.5%	36,565	9.0%	6.7%
No related children under 18	17,212	4.3%	21,088	5.2%	22.5%
Nonfamily Households					
Male householders	55,282	13.7%	58,940	14.6%	6.6%
Female householders	78,220	19.3%	82,402	20.4%	5.3%
Total Households	404,312	100.0%	404,765	100.0%	0.1%
Total female householders	129,713	32.1%	140,055	34.6%	8.0%
Total households with children	136,940	33.9%	125,613	31.0%	-8.3%

Sources: U.S. Census 2000 SF1 Tables P027 and P035 and 2010 SF1 Tables P29 and P39

⁴¹ The Census defines a family household as a household with two or more people (one of whom is the householder) related by birth, marriage, or adoption residing together. A family household also includes any unrelated people who may be residing with the family.

Like St. Louis County, Florissant's 21,247 households were approximately two-thirds families (65.0%) and one-third (35.0%) nonfamily as of 2010. These shares are quite similar to the breakdown nationwide of 66.4% family and 33.6% nonfamily households.

Also like the County, Florissant lost married couple households, both with and without children, since 2000. Growth rates for other family types – male and female householders with or without children – ranged from 31.5% to 38.2%, again showing a trend toward more diversity in terms of household type. By 2010, female householders made up 37.7% of Florissant's households, up from 33.2% in 2000. The total number of households with children remained relatively constant, with gains in other families with children offsetting losses of married couples with children.

Familial Status and Sex of Householder in Florissant					
Household Type	2000		2010		2000-2010 % Change
	Count	Share	Count	Share	
Family Households					
Married couple householders	10,168	49.8%	9,002	42.4%	-11.5%
With related children under 18	4,555	22.3%	3,808	17.9%	-16.4%
No related children under 18	5,613	27.5%	5,194	24.4%	-7.5%
Male householder, no wife	822	4.0%	1,084	5.1%	31.9%
With related children under 18	467	2.3%	614	2.9%	31.5%
No related children under 18	355	1.7%	470	2.2%	32.4%
Female householder, no husband	2,697	13.2%	3,714	17.5%	37.7%
With related children under 18	1,694	8.3%	2,341	11.0%	38.2%
No related children under 18	1,003	4.9%	1,373	6.5%	36.9%
Nonfamily Households					
Male householders	2,640	12.9%	3,148	14.8%	19.2%
Female householders	4,072	20.0%	4,299	20.2%	5.6%
Total Households	20,399	100.0%	21,247	100.0%	4.2%
Total female householders	6,769	33.2%	8,013	37.7%	18.4%
Total households with children	6,716	32.9%	6,763	31.8%	0.7%

Sources: U.S. Census 2000 SF1 Tables P027 and P035 and 2010 SF1 Tables P29 and P39

In O'Fallon in 2010, families made up three-quarters of the City's 28,234 households and nonfamilies constituted one-quarter. Compared to St. Louis County, Florissant and the U.S., O'Fallon had a higher share of households with children (44.2%) and a lower share of female householders (23.3%).

While household type did diversify in O'Fallon over the last decade, the city did not have the drop in married couple households that occurred in St. Louis County or Florissant. In contrast, O'Fallon

saw growth in all household types, contributing to an overall household growth rate of 83.5%. One factor fueling this growth, especially among households with children, is likely the strong reputation of O'Fallon's schools.

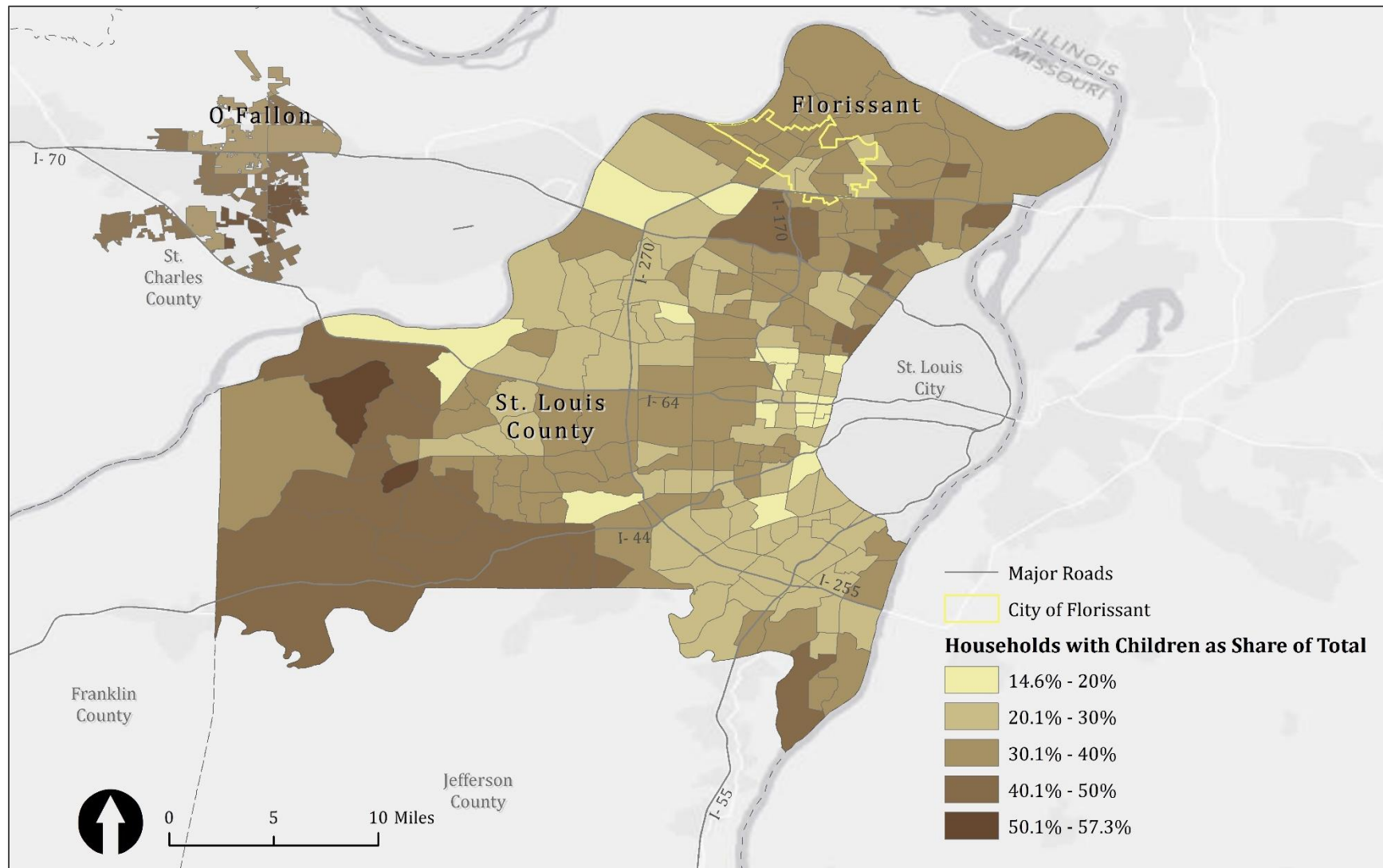
Familial Status and Sex of Householder in O'Fallon					
Household Type	2000		2010		2000-2010 % Change
	Count	Share	Count	Share	
Family Households					
Married couple householders	10,749	69.8%	17,401	61.6%	61.9%
With related children under 18	6,677	43.4%	9,738	34.5%	45.8%
No related children under 18	4,072	26.5%	7,663	27.1%	88.2%
Male householder, no wife	534	3.5%	1,206	4.3%	125.8%
With related children under 18	369	2.4%	768	2.7%	108.1%
No related children under 18	165	1.1%	438	1.6%	165.5%
Female householder, no husband	1,325	8.6%	2,829	10.0%	113.5%
With related children under 18	1,005	6.5%	1,980	7.0%	97.0%
No related children under 18	320	2.1%	849	3.0%	165.3%
Nonfamily Households					
Male householders	1,482	9.6%	3,056	10.8%	106.2%
Female householders	1,299	8.4%	3,742	13.3%	188.1%
Total Households	15,389	100.0%	28,234	100.0%	83.5%
Total female householders	2,624	17.1%	6,571	23.3%	150.4%
Total households with children	8,051	52.3%	12,486	44.2%	55.1%

Sources: U.S. Census 2000 SF1 Tables P027 and P035 and 2010 SF1 Tables P29 and P39

The maps on the following pages identify concentrations of households with children and of female householders. The greatest concentration of households with children is in west St. Louis County, including Wildwood, Clarkson Valley, and parts of Chesterfield and Ellisville. Areas in north St. Louis County with a concentration of households with children (40% or more) include Berkeley, Kinloch, Pagedale, Wellston, Country Club Hills, Castle Point, Glasgow Village, and Moline Acres.

Households with children make up between 20 and 40% of all tracts in Florissant. In each O'Fallon tract, 30% or more of households have children.

Share of Households with Children by Census Tract in St. Louis County, Florissant and O'Fallon: 2010



Source: U.S. Census 2010 SF1 Table P39

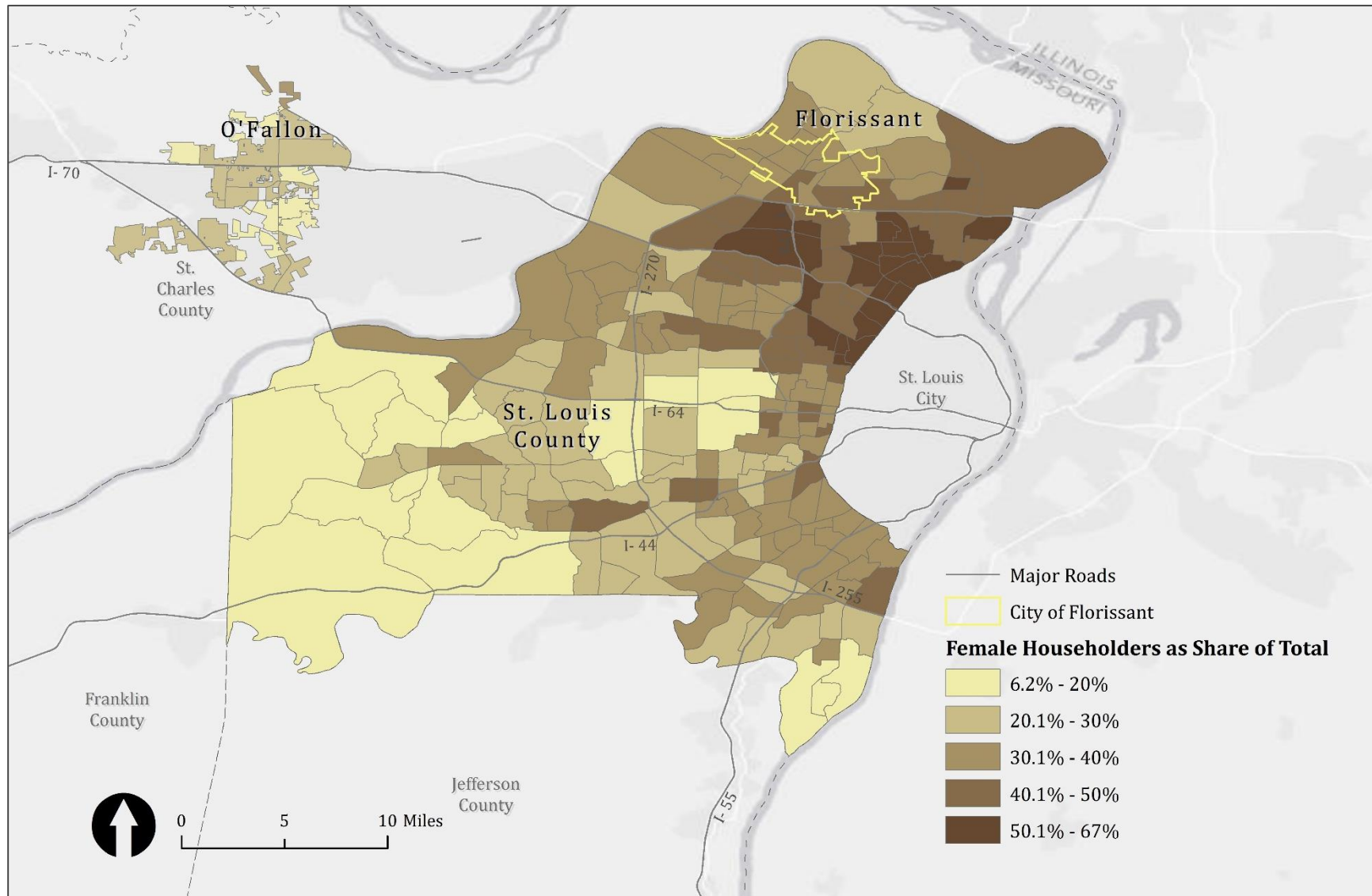
Looking at female householders, the greatest concentrations are in north St. Louis County,⁴² where 22 tracts have shares of 50% or more. Each of these census tracts has an African American population share of over 70%, indicating that these areas represent concentrations of multiple protected classes. West St. Louis County has the lowest representation of female householders – less than 20% in most tracts in that area.

Most tracts in Florissant have female householder shares from 30-40% of total households, although two tracts partially in the city fall in the 40-50% range.

In most O’Fallon tracts, households with female householders make up 20-30% of the total. Female householders constitute less than 20% of the total in the remaining tracts.

⁴² Jurisdictions in this area include Bel-Ridge, Berkeley, Beverly Hills, Castle Point, Country Club Hills, Dellwood, Flordell Hills, Glasgow Village, Hanley Hills, Jennings, Kinloch, Moline Acres, Northwoods, Pagedale, Uplands Park, Velda City, Velda Village Hills, and Wellston.

Share of Female Householders by Census Tract in St. Louis County, Florissant and O'Fallon: 2010



Source: U.S. Census 2010 SF1 Tables P29 and P39

Disability

According to the most recent American Community Survey data (2008-2012), St. Louis County had a disabled population of 110,830 (11.2% of total population). Of persons with a disability, just over one-half (56.8%) were under the age of 65 and the remaining 43.2% were 65 or older.

Disability Status of the Population		
Disability Status	Count	Share of Total
St. Louis County		
Disability Status		
Total population	986,648	100.0%
With a disability	110,830	11.2%
Population under age 65	843,739	100.0%
With a disability	62,963	7.5%
Population age 65 and over	142,909	100.0%
With a disability	47,867	33.5%
City of Florissant		
Disability Status		
Total population	51,591	100.0%
With a disability	7,193	13.9%
Population under age 65	43,790	100.0%
With a disability	4,162	9.5%
Population age 65 and over	7,801	100.0%
With a disability	3,031	38.9%
City of O'Fallon		
Disability Status		
Total population	78,855	100.0%
With a disability	6,773	8.6%
Population under age 65	71,848	100.0%
With a disability	4,331	6.0%
Population age 65 and over	7,007	100.0%
With a disability	2,442	34.9%

Source: 2008-2012 American Community Survey Tables B18101 to B18107

Disability rates were slightly higher (13.9%) in Florissant, but the breakdown by age is similar – 57.9% of disabled persons were under age 65 and 42.1% over. In contrast, O'Fallon had a lower disability rate (8.6%), and of the disabled population, a higher share (63.9%) were under age 65. Disability rates in St. Louis County and O'Fallon are below the national average of 12.0%, while Florissant is above this mark.

The map on the next page shows that the geographic distribution of the disabled population is relatively heaviest in north and south St. Louis County. Most tracts in these areas have a disabled population share that is 10-20% of the tract total; in 9 tracts, persons with a disability constitute more than 20% of the total population. In west and central St. Louis County, the majority of tracts have a disabled population share below 10%. In both Florissant and O'Fallon, disability rates vary by tract, from under 7% to the 13-20% range.

Religious Affiliation

Religion is not one of the questions surveyed by the U.S. Census Bureau making dependable, comprehensive data on religious affiliation difficult to find. The data used in this report appear in the 2010 U.S. Religion Census: Religious Congregations & Membership Study, a county-by-county enumeration of religious bodies in the U.S. published by the Association of Statisticians of American Religious Bodies (ASARB). The smallest geography for which data is available in this Study is the county level, and thus no figures are available for Florissant or O'Fallon, or at the tract level. Data for St. Louis County and St. Charles County (which contains O'Fallon) are shown in the table below, Population by Religious Affiliation in 2010.

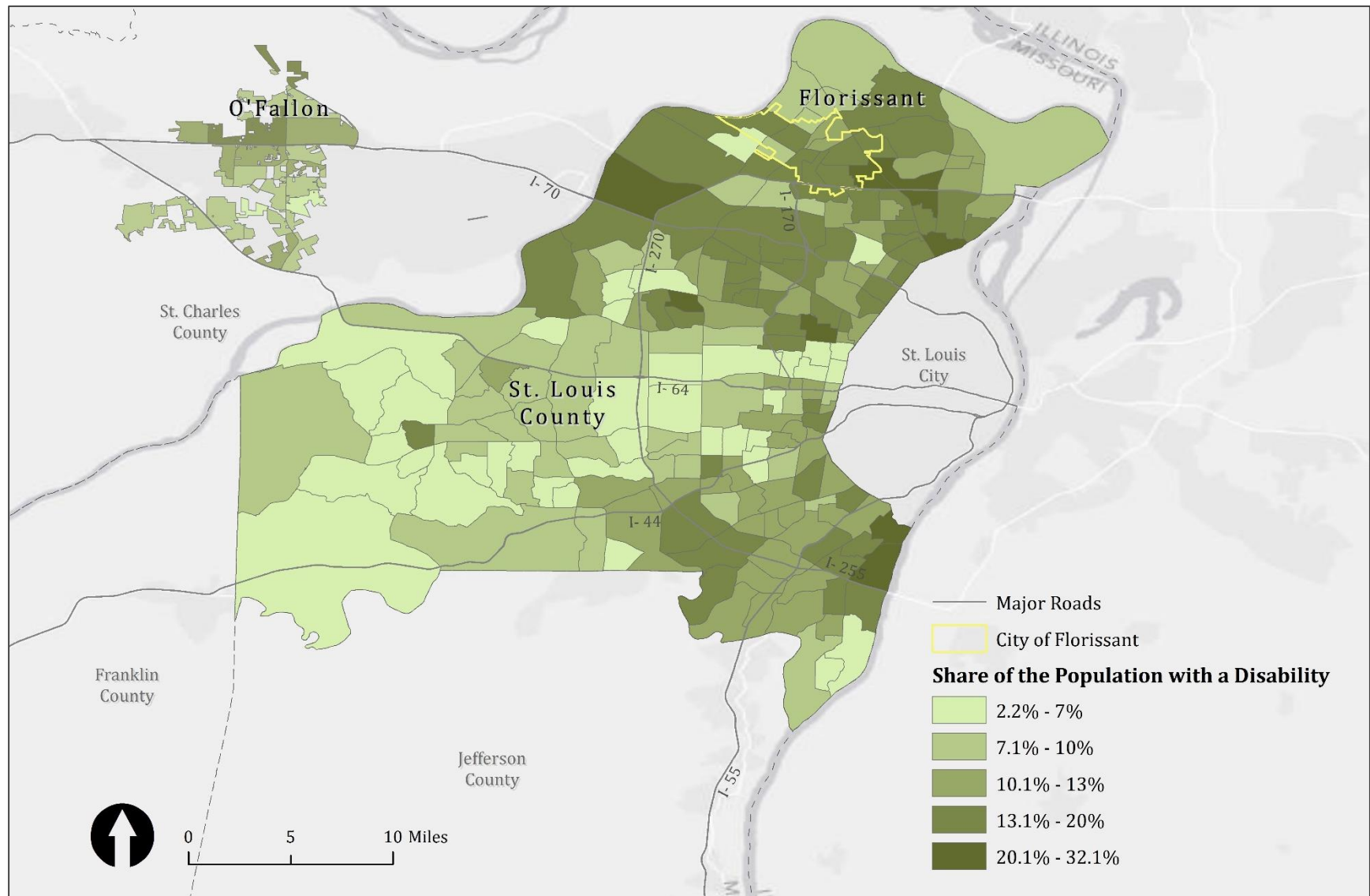
In both St. Louis and St. Charles Counties, 51.7% of the population adhered to a religion as of 2010.⁴³ Of those claiming a religious affiliation, Catholics made up the largest share in each county at 23.1% and 23.7% of the population, respectively, followed by Evangelical Protestants at 16.3% and 20.0%, respectively. Nationally, Catholics and Evangelical Protestants constituted 18.9% and 16.2% of the population, respectively.

Population by Religious Affiliation in St. Louis and St. Charles County, 2010				
Religious Affiliation	St. Louis County		St. Charles County	
	Count	Share	Count	Share
Black Protestant	9,369	0.9%	406	0.1%
Catholic	230,488	23.1%	85,536	23.7%
Evangelical Protestant	162,614	16.3%	72,210	20.0%
Mainline Protestant	74,404	7.4%	24,412	6.8%
Orthodox	2,042	0.2%	----	----
Other	37,156	3.7%	3,929	1.1%
Unclaimed	482,881	48.3%	173,992	48.3%
Total Population	998,954	100.0%	360,485	100.0%

Source: Association of Statisticians of American Religious Bodies, *2010 U.S. Religion Census: Religious Congregations & Membership Study*

⁴³ Congregational adherents include all full members, their children, and others who regularly attend services. "Unclaimed," are not adherents of any of the 236 groups included in the Religious Congregations & Membership Study, 2010.

Share of Population with a Disability by Census Tract in St. Louis County, Florissant and O'Fallon: 2008-2012



Source: 2008-2012 American Community Survey Table B18101

Summary of Findings

- Racial/ethnic composition in St. Louis County and Florissant is similar – both are about two-thirds White and one-quarter Black. O’Fallon is considerably less diverse, with a White population of 88.2% and a Black population of only 4.0%.
- The majority of St. Louis County’s Black population is concentrated in the north, where 26 tracts have a Black population share of over 80%. In comparison, only seven tracts located south of I-64 have Black population shares of over 10%.
- Hispanic residents make up only 2.5% of the County’s population and tend to live in a more dispersed pattern than do Blacks. The largest concentration of Hispanic residents is southwest of the I-70 and I-170 interchange, and makes up 17.4% of the County total.
- Seven percent of the County’s population is foreign-born, and non-U.S. natives are most heavily concentrated in central St. Louis County, extending southwest but not to the Franklin or Jefferson County borders.
- Given its low level of diversity, O’Fallon does not have significant concentrations of Black, Hispanic, or foreign-born populations, and these groups tend to reside relatively evenly throughout the city.
- Just under one-third of households in St. Louis County and Florissant have children (31.0 and 38.0%, respectively). Tracts in west St. Louis County have the highest shares of households with children (40% or more), along with a few areas in the north (including Berkeley, Glasgow Village, and Castle Point).
- Households with children are more common in O’Fallon at 44.2% of total households, and at least 30% of households in each census tract.
- Female householders make up 34.6% of St. Louis County, 37.7% of Florissant, and 23.3% of O’Fallon. The greatest concentration is in north St. Louis County, where 22 tracts have shares of 50% or more.
- Most tracts in Florissant have female householder shares from 30-40% of total households, while all tracts in O’Fallon have shares below 30%.
- Persons with a disability constitute 11.2% of the St. Louis County population, 13.9% of Florissant, and 86% of O’Fallon. Disability rates are uniformly higher for the population age 65 and over, ranging from 33.5% in St. Louis County to 38.9% in Florissant. Geographic concentrations of the disabled population are relatively heaviest in north and south St. Louis County and lowest in the west and center.
- Of persons in St. Louis County claiming a religion, the largest shares are Catholics and Evangelical Protestants, who make up 23.1% and 16.3% of the total population, respectively. Religion data is not available at the city level.

Segregation Analysis

Segregation, or the degree to which two or more racial or ethnic groups live geographically separate from one another, can directly affect the quality of life in cities and neighborhoods. As new people settle in an area, their race or ethnicity is likely to have an effect on the dynamics of the community where they live.⁴⁴ A study by the Federal Reserve Bank of Cleveland compared the economic growth of more than 100 areas in the U.S. between 1994 and 2004 and concluded that racial diversity and inclusion was “positively associated with a host of economic growth measures, including employment, output, productivity, and per capita income.”⁴⁵ In general, diverse communities have been found to benefit from greater innovation arising out of the varied perspectives within the community. Additionally, multilingual and multicultural regions are best positioned for success in the global marketplace.

Despite the economic and other advantages of diversity, patterns of racial and ethnic segregation remain prevalent in many regions and cities. Segregation is typically perceived of negatively, but it is important to note that it is not always due to overt housing discrimination. In fact, there could be at least three reasons why patterns of segregation exist:

- personal preferences cause individuals to want to live in neighborhoods with others of a particular race and ethnicity;
- income differences across race and ethnic groups limit the selection of neighborhoods where persons of a particular race and ethnicity can live; and,
- illegal discrimination in the housing market limits the selection of neighborhoods where persons of a particular race and ethnicity can live.

However, even when the causes of segregation are benign, its effects can be detrimental. “Numerous studies have focused on the possible effects of residential neighborhoods on social and economic outcomes. Persistent economic and racial residential segregation is implicated in enduring racial and ethnic inequality.”⁴⁶ For example, research demonstrates that African American homeowners earn less equity in their non-rental homes because their incomes are lower and they reside in areas that are more segregated. “Individuals take account of the race-ethnic composition of neighborhoods when deciding if and where to move. These patterns may result from a number of underlying social processes. While race-ethnic prejudice may govern residential choices to some degree, the ethnic composition of a neighborhood is also correlated with other factors that

⁴⁴ Sawyer, N. and Tatian, P. (2003, October). Segregation Patterns in the District of Columbia: 1980 to 2000. Washington, DC: The Urban Institute.

⁴⁵ PolicyLink. 2011. “America’s Tomorrow: Equity is the Superior Growth Model.”
http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406d-a6d5eca3bbf35af0%7D/SUMMIT_FRAMING_WEB_FINAL_20120127.PDF

⁴⁶ Bruch, E. (2005) Residential Mobility, Income, Inequality, and Race/Ethnic Segregation in Los Angeles. Princeton, NJ: Princeton, University.

determine neighborhood attractiveness. For example, neighborhoods vary in levels of crime, quality housing, and poverty.”⁴⁷

The task in this Segregation Analysis is to determine the degree to which residents of St. Louis County (including Florissant) and O’Fallon are segregated by race and ethnicity, based on population counts from the 2000 and 2010 U.S. Censuses.

Residential segregation is the degree to which two or more racial or ethnic groups live geographically separate from one another. Early in the field of residential segregation analysis Duncan and Duncan⁴⁸ (1955) defined a “dissimilarity index” which became the standard segregation measure for evenness of the population distribution by race. By 1988 researchers had begun pointing out the shortcomings of dissimilarity indices when used apart from other measures of potential segregation. In a seminal paper, Massey and Denton⁴⁹ (1988) drew careful distinctions between the related spatial concepts of sub-population distribution with respect to evenness (minorities may be under- or over-represented in some areas) and exposure (minorities may rarely share areas with majorities thus limiting their social interaction).

This report will use the methodology set forth by Duncan and Duncan for the measurement of evenness of the population distribution by race (dissimilarity index) as well as measures of exposure of one race to another (exposure and isolation indices), based on the work of Massey and Denton. Workers in the field generally agree that these measures adequately capture the degree of segregation. These measures have the advantage of frequent use in segregation analyses and are based on commonsense notions of the geographic separation of population groups. An additional analysis for the Entropy Index will provide a measure of multi-group diversity not accounted for by the other indices which necessarily are limited to two racial or ethnic groups at a time.

Dissimilarity Index

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas (census tracts in this analysis) have the same proportion of minority and majority members as the larger area in which they live (here, St. Louis County or the City of O’Fallon). Evenness is not measured in an absolute sense, but is scaled relative to some other group. The DI ranges from 0.0 (complete integration) to 1.00 (complete segregation). HUD identifies a DI value between 0.41 and 0.54 as a moderate level of segregation and 0.55 or above as a high level of segregation.

⁴⁷ Ibid.

⁴⁸ Duncan, Otis D., and Beverly Duncan. 1955. “A Methodological Analysis of Segregation Indices.” *American Sociological Review*, Vol. 20.

⁴⁹ Massey, Douglas, S. and Denton, N. A., 1988. “The Dimensions of Residential Segregation.” *Social Forces*, Vol. 67, No. 2, University of North Carolina Press.

The regional proportion of the minority population can be small and still not be segregated if evenly spread among tracts. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority (or vice versa).

Although the literature provides several similar equations for the calculation of the DI, the one below is the most commonly used. This equation differences the magnitude of the weighted deviation of each census tract's minority share with the tract's majority share which is then summed over all the tracts in the region:⁵⁰

$$D = \left(\frac{1}{2} \right) \sum_{i=1}^n \left| \frac{Min_i}{Min_T} - \frac{Maj_i}{Maj_T} \right|$$

where:

D = Dissimilarity Index

Min_i = Minority group population of census tract i

Min_T = Minority group regional population

Maj_i = Majority group population of census tract i

Maj_T = Majority group regional population

n = Total number of census tracts in the region.

The table below presents the results of these calculations between non-Hispanic Whites, non-Hispanic Blacks, non-Hispanic Asians, and Hispanics in St. Louis County and O'Fallon.⁵¹ The graphs that follows presents the same data in a visual format so that trends can be more readily identified.

The DI calculations for St. Louis County reveal a high degree of segregation between Whites and Blacks (0.71) that has not diminished since 2000. This finding can be interpreted to mean that in 2010, 71% of Black residents *or* 71% of White residents would have to move in order for the two groups to be identically distributed throughout the County, thus eliminating Black and White segregation. A high degree of segregation also exists between Asians and Blacks (0.78) and Hispanics and Blacks (0.63), while remaining pairs (Hispanic-White, Asian-White, and Hispanic-Asian) have low levels of segregation. Taken together, these indices mean that the County's Black

⁵⁰ Calculation after Desegregation Court Cases and School Demographics Data, Brown University, Providence, Rhode Island. Source: <http://www.s4.brown.edu/schoolsegregation/desegregationdata.htm>. Accessed February 27, 2013.

⁵¹ The DI methodology requires that each group be distinct from each other. Each racial or ethnicity (Hispanic) group cannot overlap. This study focuses primarily on four groups: Hispanics, Non-Hispanic Whites, Non-Hispanic Blacks, and Non-Hispanic Asians (to be called "Whites," "Blacks," and "Asians" for simplicity).

population tends to be highly segregated from persons of other races/ethnicities, while those persons of other races/ethnicities are more likely to live amongst one another.

The graphs on the following page illustrate trends between 2000 and 2010, showing that racial/ethnic segregation in St. Louis County has strengthened over the ten year period, increasing for five of the six comparisons and remaining constant in the sixth.

Segregation levels in Florissant in 2010 were low for all paired subgroups, from a low of DI = 0.16 for Hispanics and Whites to a high of DI = 0.35 for Blacks and Whites, suggesting that residential patterns were relatively similar for most subpopulations in the City. A comparison with 2000 figures, however, shows an increase in segregation for three of the pairings (Hispanic-White, Asian-White, and Hispanic-Asian). These increases are likely due to both a loss of White population in the City, along with growth and altered residential patterns of the Hispanic and Asian populations.

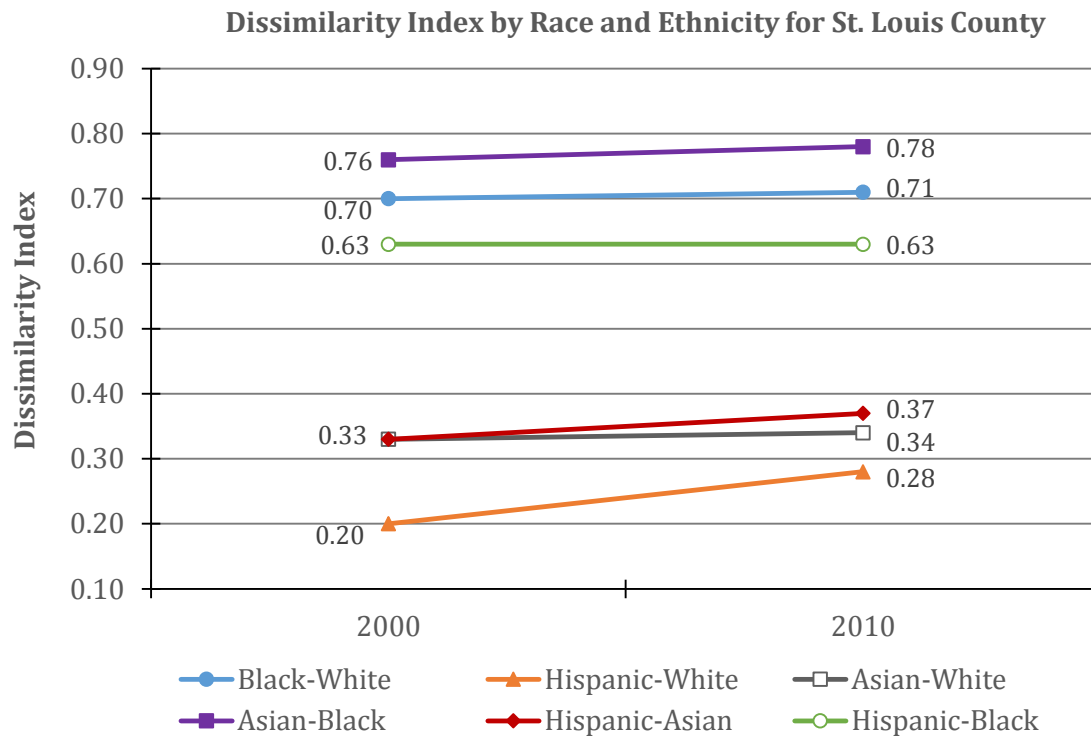
In O'Fallon, segregation was low amongst all population subgroups, ranging from 0.11 for Black-White populations to 0.25 for Asian-White populations. These figures suggest that O'Fallon's low number of minority residents (only 11.8% of the City's total population) tend to follow relatively similar patterns residential patterns as one another and the majority population. Highest DIs are for Asian residents relative to all other subpopulations, indicating that they are the most segregated.

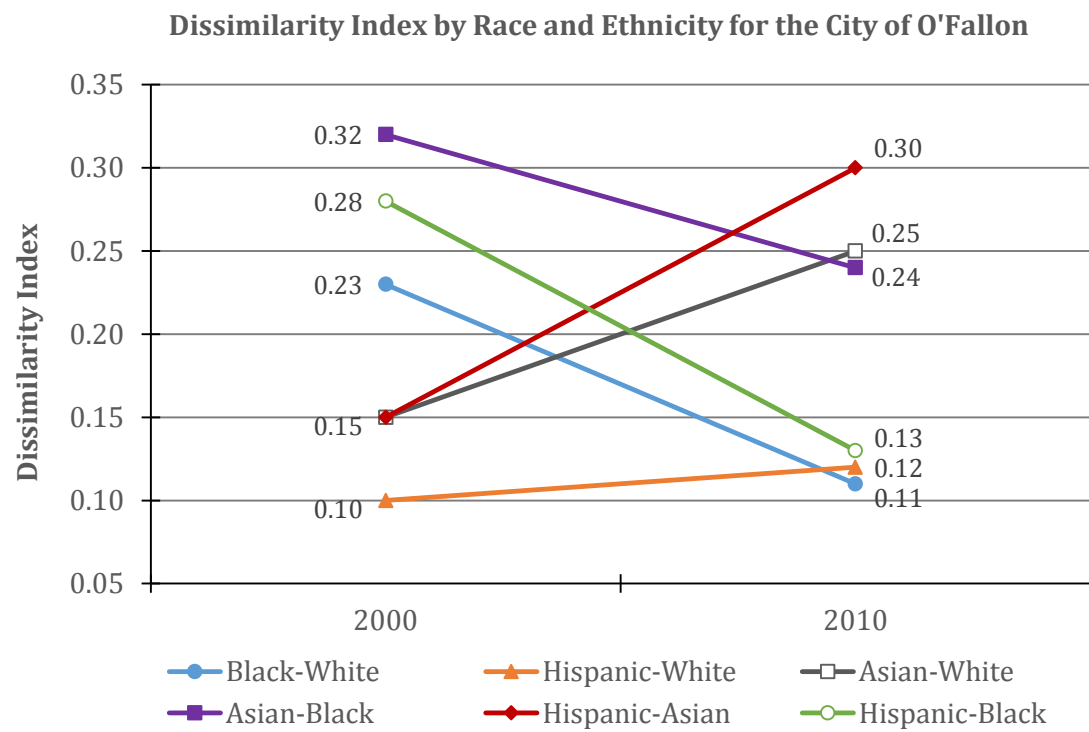
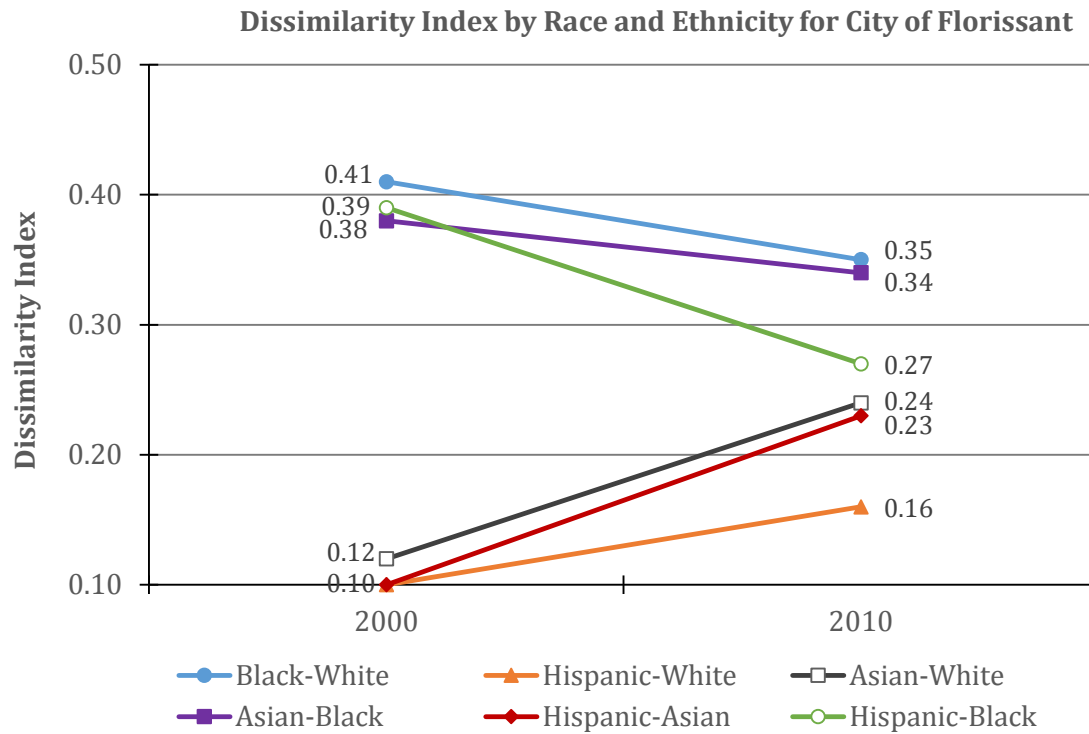
DIs in O'Fallon show greater variability from 2000 to 2010 than in St. Louis County. Hispanic-Asian, Asian-White, and Hispanic-White values increased, while each pairing including Black residents (Black-White, Asian-Black, and Hispanic-Black) declined. This variability is likely a result of the large increase in minority populations from 2000 to 2010, which ranged from 204.7% for Blacks to 630.9% for Hispanics.

Dissimilarity Index			
Group Exposure	2000	2010	Change
St. Louis County			
Black-White	0.70	0.71	+0.01
Hispanic-White	0.20	0.28	+0.08
Asian-White	0.33	0.34	+0.01
Asian-Black	0.76	0.78	+0.02
Hispanic-Asian	0.33	0.37	+0.04
Hispanic-Black	0.63	0.63	-----

Dissimilarity Index (continued)			
Group Exposure	2000	2010	Change
City of Florissant			
Black-White	0.41	0.35	-0.06
Hispanic-White	0.10	0.16	+0.06
Asian-White	0.12	0.24	+0.12
Asian-Black	0.38	0.34	-0.04
Hispanic-Asian	0.10	0.23	+0.13
Hispanic-Black	0.39	0.27	-0.12
City of O'Fallon			
Black-White	0.23	0.11	-0.12
Hispanic-White	0.10	0.12	+0.02
Asian-White	0.15	0.25	+0.10
Asian-Black	0.32	0.24	-0.08
Hispanic-Asian	0.15	0.30	+0.15
Hispanic-Black	0.28	0.13	-0.15

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5





Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Exposure Index

Two basic, and related, measures of racial and ethnic interaction are exposure (this section) and isolation (next section). These two indices, respectively, reflect the possibility that a minority person shares a census tract with a majority person (Exposure Index, EI, this section) or with another minority person (Isolation Index, II, next section).

“Exposure measures the degree of potential contact between minority and majority group members” (Massey and Denton 1988). Exposure is a measure of the extent two groups share common residential areas and so it reflects the degree to which the average minority group member experiences segregation. The EI can be interpreted as the probability that a minority resident will come in contact with a majority resident, and ranges in value from 0.0 to 1.0, where higher values represent lower segregation.

As with the Dissimilarity Index, each calculation of EI involves two mutually exclusive racial or ethnic groups. The EI measures the exposure of minority group members to members of the majority group as the minority-weighted average (the first term in the equation below) of the majority proportion (the second term) of the population in each census tract, which can be written as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Maj_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members interact with majority group members

Min_i = Minority group population of census tract i

Min_T = Minority group regional population

Maj_i = Majority group population of census tract i

Tot_i = Total population of census tract i

n = Total number of census tracts in the region.

The EI is not “symmetrical” so the probability of a typical Black person meeting a White person in a tract is not the same as the probability of a typical White person meeting a Black person in that tract. An illustrative example of this asymmetry is to imagine a census tract with many White residents and a single Black resident. The Black person would see all White people, but the White residents would see only one Black person. Each would see a much different world with respect to group identification.

The maximum value of the EI depends both on the distribution of racial and ethnic groups and on the proportion of minorities in the area studied. Generally, the value of this index will be highest when the two groups have equal numbers and are spread evenly among tracts (low segregation). If a minority is a small proportion of a region's population, that group tends to experience high levels of exposure to the majority regardless of the level of evenness.⁵²

The "Exposure Index" table shows that in St. Louis County in 2010 the typical probability of a Black person interacting with a White person was 32%, and that the probability of a White person interacting with a Black person was lower at 11%. This probability can also be interpreted to mean that on average 32 of every 100 people a Black person met were White and 11 of every 100 people a White person met were Black. Asians and Hispanics had higher likelihoods of meeting Whites (78% and 71%, respectively), but a much smaller chance of Whites meeting them (4% and 3%).

In Florissant in 2010, exposure indices were highest for minority populations' exposure to Whites – from 0.48 for Blacks to 0.60 for Hispanics and Asians. Other subpopulation pairings with relatively higher levels of exposure to one another include Whites, Asians, Hispanics to Blacks. Whites had very limited levels of exposure to other minority groups.

In O'Fallon, 2010 exposure indices were high for each measure of minority exposure to Whites, ranging from 0.88 to 0.89. In contrast, every other pairing showed very low levels of exposure (all under 0.05). These findings indicate that minority residents are highly likely to meet White residents within their census tract, but unlikely to meet another minority; Whites, meanwhile, are unlikely to meet a minority resident.

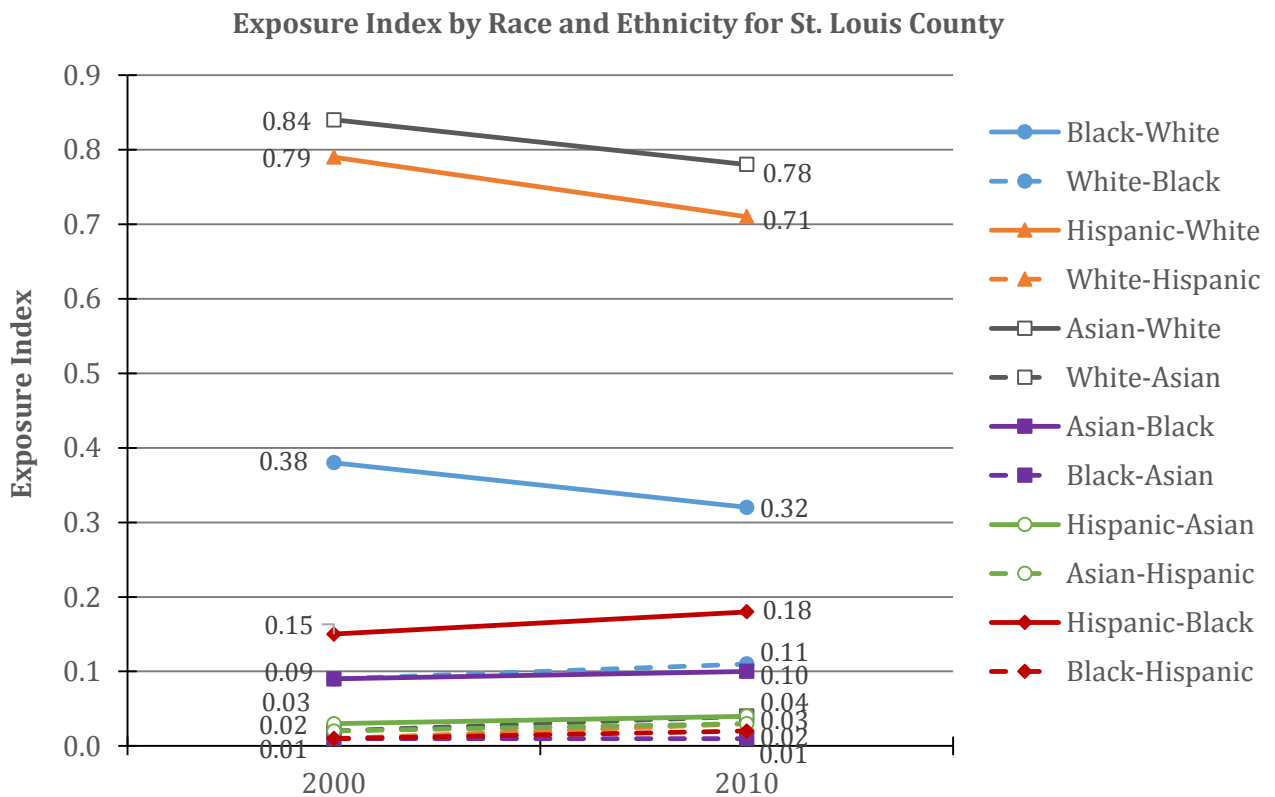
In each geography, exposure increased from 2000 to 2010 for every pairing except those involving minority exposure to White residents. The following graphs "Exposure Index by Race and Ethnicity" show slight increases (upward sloping lines) for exposure to every minority subpopulation for both each other and for Whites. The three downward sloping lines in each graph illustrate the decline in exposure of each minority group (Black, Asian and Hispanic) to Whites.

⁵² John Iceland, Weinberg D.H., and Steinmetz, E. 2002. "Racial and Ethnic Residential Segregation in the United States: 1980-2000." U.S. Census Bureau. Paper presented at the annual meetings of the Population Association of America, Atlanta, Georgia.

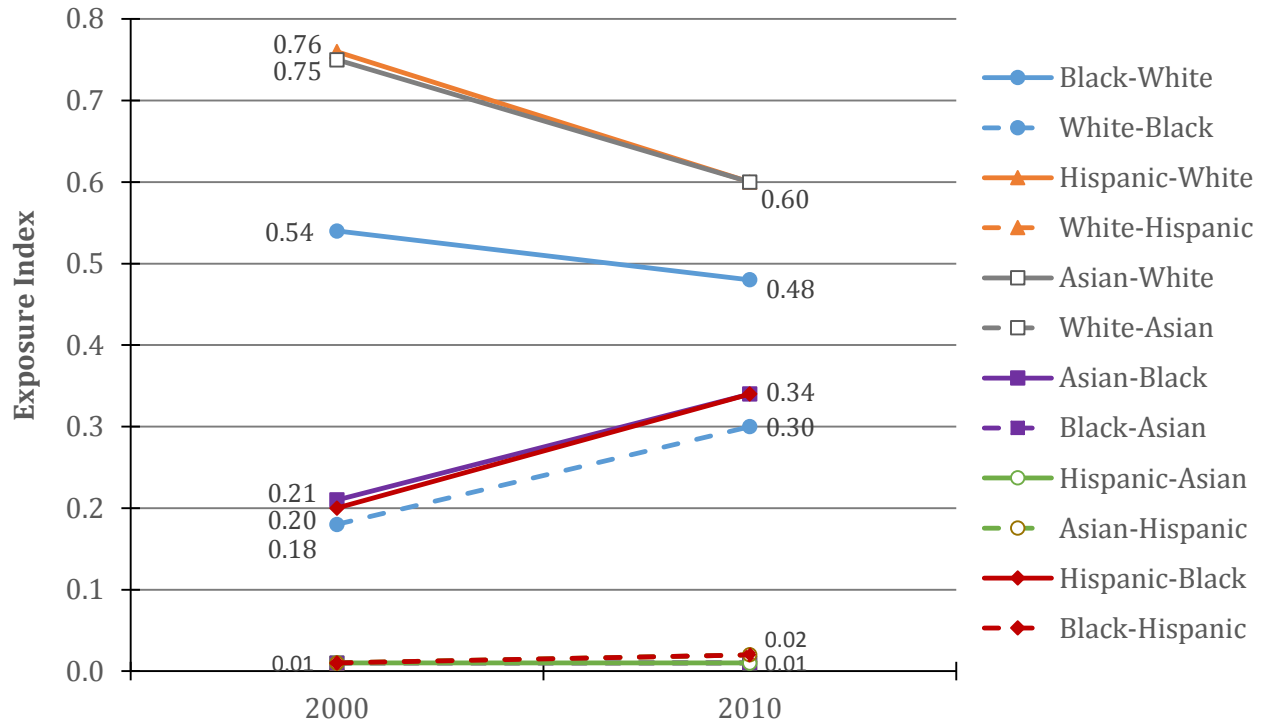
Exposure Index			
Interacting Groups	2000	2010	Change
St. Louis County			
Black-White	0.38	0.32	-0.06
White-Black	0.09	0.11	+0.02
Hispanic-White	0.79	0.71	-0.08
White-Hispanic	0.01	0.03	+0.02
Asian-White	0.84	0.78	-0.06
White-Asian	0.02	0.04	+0.02
Asian-Black	0.09	0.10	+0.01
Black-Asian	0.01	0.01	-----
Hispanic-Asian	0.03	0.04	+0.01
Asian-Hispanic	0.02	0.03	+0.01
Hispanic-Black	0.15	0.18	+0.03
Black-Hispanic	0.01	0.02	+0.01
City of Florissant			
Black-White	0.54	0.48	-0.06
White-Black	0.18	0.30	+0.12
Hispanic-White	0.76	0.60	-0.16
White-Hispanic	0.01	0.02	+0.01
Asian-White	0.75	0.60	-0.15
White-Asian	0.01	0.01	-----
Asian-Black	0.21	0.34	+0.13
Black-Asian	0.01	0.01	-----
Hispanic-Asian	0.01	0.01	-----
Asian-Hispanic	0.01	0.02	+0.01
Hispanic-Black	0.20	0.34	+0.14
Black-Hispanic	0.01	0.02	+0.01

Exposure Index (continued)			
Interacting Groups	2000	2010	Change
City of O'Fallon			
Black-White	0.91	0.89	-0.02
White-Black	0.02	0.04	+0.02
Hispanic-White	0.94	0.89	-0.05
White-Hispanic	0.01	0.03	+0.02
Asian-White	0.94	0.88	-0.06
White-Asian	0.01	0.03	+0.02
Asian-Black	0.02	0.04	+0.02
Black-Asian	0.01	0.03	+0.02
Hispanic-Asian	0.01	0.03	+0.02
Asian-Hispanic	0.02	0.03	+0.01
Hispanic-Black	0.02	0.04	+0.02
Black-Hispanic	0.01	0.03	+0.02

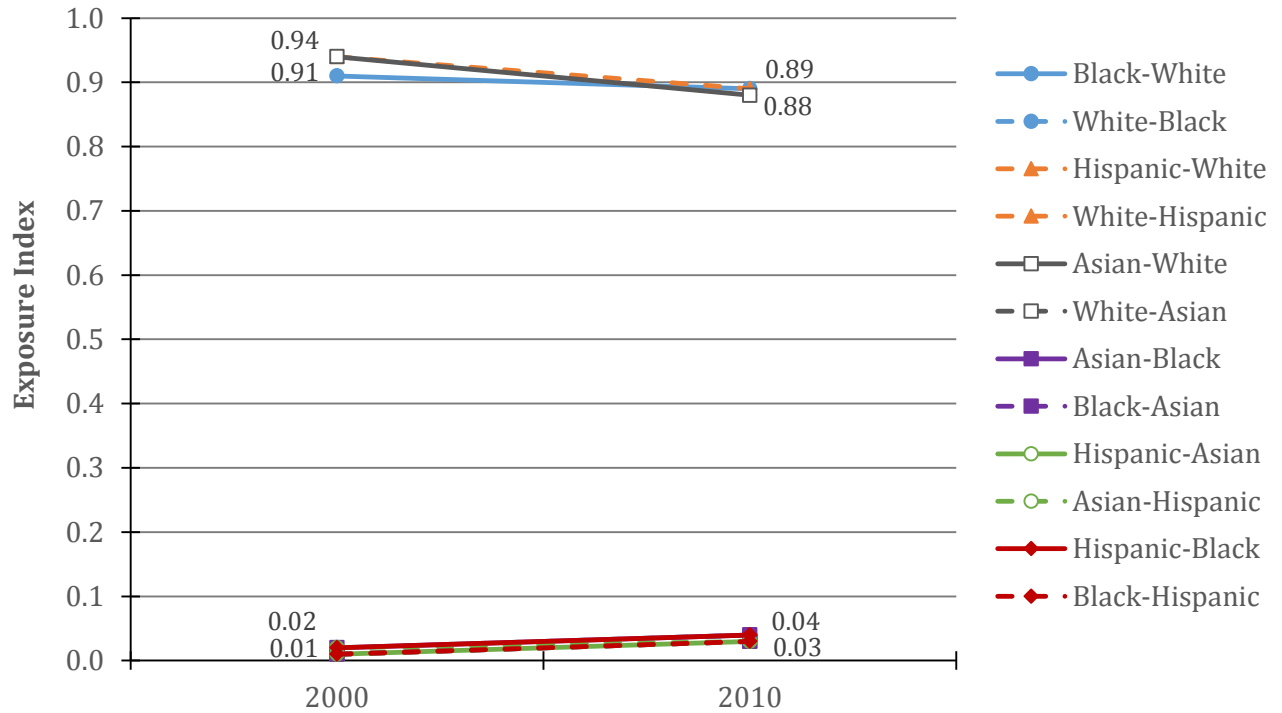
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5



Exposure Index by Race and Ethnicity for the City of Florissant



Exposure Index by Race and Ethnicity for the City of O'Fallon



Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Isolation Index

The Isolation Index (II) measures “the extent to which minority members are exposed only to one another” (Massey and Denton, p. 288). Not a measure of segregation in a strict sense, the II is a measure of the probability that a member of one group will meet or interact with a member of the same group. The II can be viewed more as a measure of sociological isolation.

A simple change in notation from the Exposure Index equation yields the formula for the Isolation Index given below. This measure is calculated for one racial or ethnic group at a time so unlike the DI or EI, it does not compare the distribution of two groups. Instead, each calculation measures the isolation of a single group.

Similar to the EI, this index describes the average neighborhood for racial and ethnic groups. It differs in measuring social interaction with others of the same group instead of other groups. The II is the minority weighted average (the first term of the equation) of each tract’s minority population (the second term) and can be defined as:

$$Prob = \sum_{i=1}^n \left(\frac{Min_i}{Min_T} \right) \left(\frac{Min_i}{Tot_i} \right)$$

where:

Prob = Probability that minority group members share an area with each other

Min_i = Minority group population of census tract i

Min_T = Minority group regional population

Tot_i = Total population of census tract i

n = Total number of census tracts in the region.

The II is a region-level measure for each race/ethnicity summed up from tracts within the region. The II can be interpreted as a probability that has a lower bound of 0.0 (low segregation corresponding to a small dispersed group) to 1.0 (high segregation implying that group members are entirely isolated from other groups).

The Isolation Index values for St. Louis County (see the table and graph on the following pages) show that Whites are considerably isolated from other racial and ethnic groups (index value of 0.81), Blacks are moderately isolated (II of 0.63), and Asians and Hispanics are not isolated (IIs of 0.07 and 0.04, respectively). These numbers mean that in 2010, on average, White residents lived in tracts that were 81% White and Blacks lived in tracts that were 63% Black.⁵³

⁵³ The Isolation Index methodology implicitly assumes that the tract populations are evenly distributed within a census tract so that the frequency of social interactions is based on the relative population counts by tract for each race or

Florissant followed similar patterns as St. Louis County in terms of isolation indices. White residents were the most isolated in 2010 with an index value of 0.64, followed by Blacks with a value of 0.46. Asian and Hispanic residents were not isolated, which is not surprising given their lower population shares.

In O'Fallon, isolation for Whites in 2010 was quite high at 0.89, while isolation for minority groups was low (all under 0.05). Again, these figures reflect O'Fallon's low level of minority population – being that they make up the vast majority of the population, Whites are more likely to reside near other Whites, and minority residents are likely to live in tracts with large White populations and little exposure to other minorities or to other residents of the same race/ethnicity.

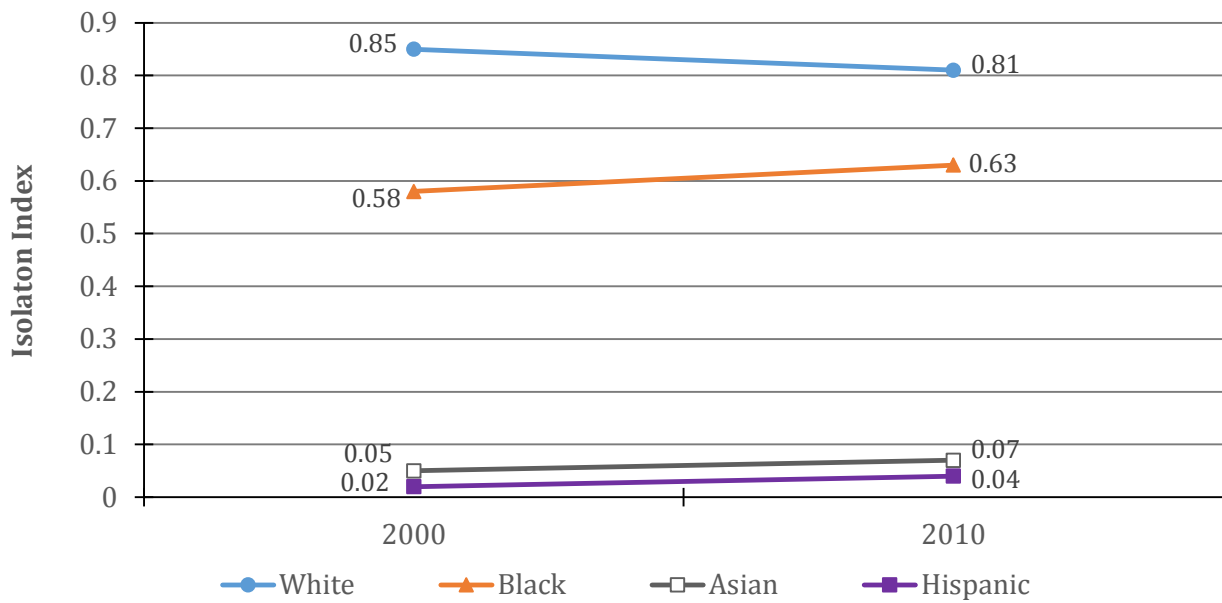
As the graphs show, White isolation decreased from 2000 to 2010 in St. Louis County, Florissant, and O'Fallon. In St. Louis County, isolation increased for each minority group examined. In Florissant, it increased for Blacks and Hispanics, while remaining constant for Asian residents. In O'Fallon Black isolation decreased and Asian and Hispanic isolation increased. Most changes were small, with none above 0.05, with the exception of White isolation in Florissant (decrease of 0.14).

Isolation Index			
Group	2000	2010	Change
St. Louis County			
White	0.85	0.81	-0.04
Black	0.58	0.63	+0.05
Asian	0.05	0.07	+0.02
Hispanic	0.02	0.04	+0.02
City of Florissant			
White	0.78	0.64	-0.14
Black	0.43	0.46	+0.03
Asian	0.01	0.01	-----
Hispanic	0.01	0.02	+0.01
City of O'Fallon			
White	0.94	0.89	-0.05
Black	0.05	0.04	-0.01
Asian	0.01	0.04	+0.03
Hispanic	0.02	0.03	+0.01

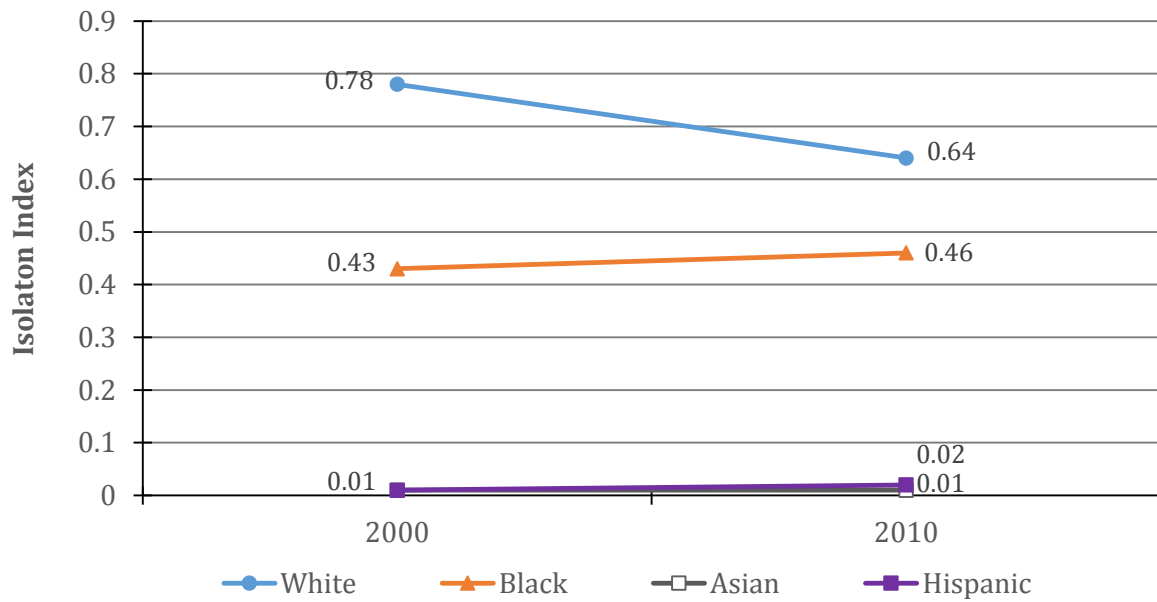
Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

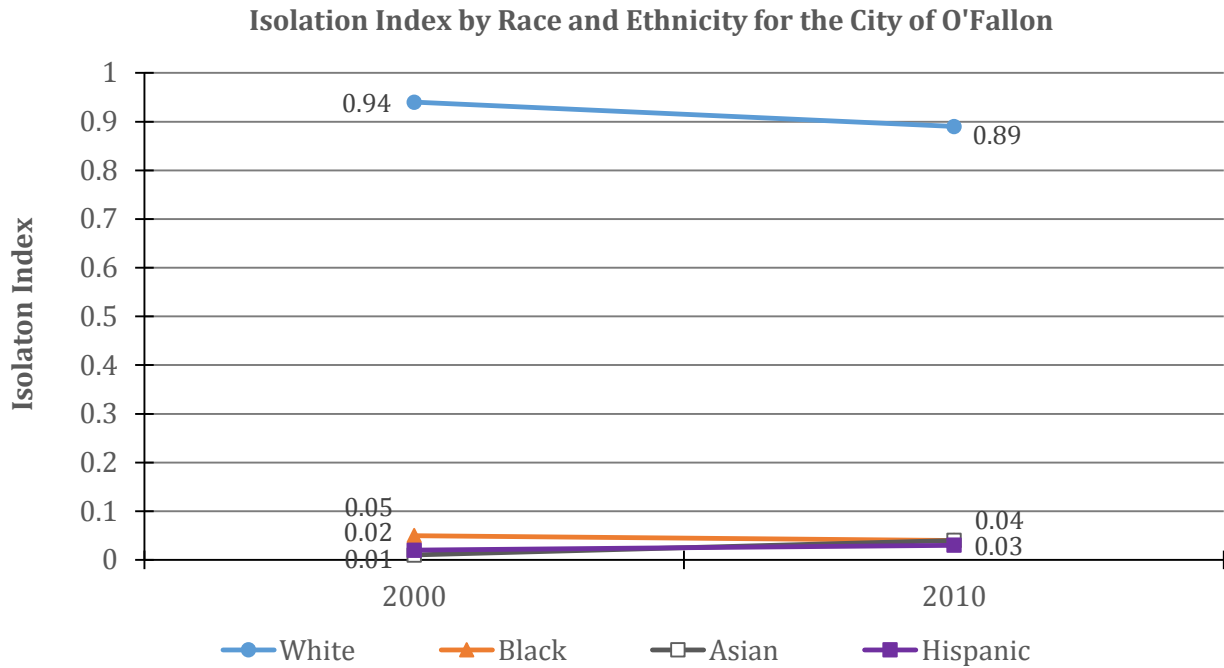
ethnicity. Within actual neighborhoods racial and ethnic groups are not homogenous (e.g., families or small area enclaves) so that the chances of one group meeting another of the same group may be different than an even distribution might imply.

Isolation Index by Race and Ethnicity for St. Louis County



Isolation Index by Race and Ethnicity for the City of Florissant





Entropy Index

Entropy, a mathematical concept based on the spatial evenness of the distribution of population groups, can be used to calculate diversity among racial and ethnic groups in a geographical area.⁵⁴ Both the Dissimilarity Index and Exposure Index can only measure the segregation of two groups relative to each other, but the Entropy Index has the advantage of being able to measure the spatial distribution of multiple racial and ethnic groups simultaneously.

The Entropy Score (h) for a census tract is given by:

$$h_i = - \sum_{j=1}^k p_{ij} \ln(p_{ij})$$

where:

k = Number of groups

p_{ij} = Proportion of population of j^{th} group in census tract i ($= n_{ij}/n_i$)

n_{ij} = Number of population of j^{th} group in tract i

n_i = Total population in tract i .

⁵⁴ Iceland, John. 2004. "The Multigroup Entropy Index (Also Known as Theil's H or the Information Theory Index)." University of Maryland.

The higher the calculated value for h , the more racially and/or ethnically diverse the tract. The maximum possible level of entropy is given by the natural logarithm (\ln) of the number of groups used in the calculations (Iceland 2004). The maximum score occurs when all groups have equal representation in the geographic area. In this case $k = 3$ (non-Hispanic Whites, non-Hispanic Blacks, and other minority groups taken together⁵⁵) so the maximum value for h is $\ln(3) = 1.10$. A tract with $h = 1.10$ would have equal proportions of all groups (high diversity) and a tract with $h = 0.0$ would contain only a single group (low diversity).

The Diversity Index map on the following page shows the results of the tract-level calculations of the Entropy Score as a measure of diversity in 2010. Visually, it can be seen that high diversity census tracts (those with highest h values) are located primarily in north and central St. Louis County. Areas of greatest diversity include St. Ann, Breckenridge Hills, Overland, St. John, Edmundson, Ferguson, Bellerive, Bel Nor, Normandy, and unincorporated north St. Louis County.

Diversity was lowest in south St. Louis County including the Wildwood, Mehlville, Oakville, Fenton, Sunset Hills, and unincorporated south St. Louis County areas. Most areas in O'Fallon had relatively low diversity, with entropy scores in the 0.36 to 0.50 range, although levels of diversity in O'Fallon were not as limited as in south St. Louis County.

The Entropy Score is not a true measure of segregation because it does not assess the distribution of racial and ethnic groups across a region. A region can be very diverse if all minority groups are present but also highly segregated if all groups live entirely in their own neighborhoods (or census tracts). However, Entropy Scores, measures of tract-level diversity, can be used to calculate the Entropy Index⁵⁶ (EI) which measures the distribution of multi-group diversity across tracts and an entire region.

The EI measures unevenness in the distribution of multiple racial and ethnic groups in a region by calculating the difference in entropy between census tracts and the larger region as a whole. The Entropy Index (H) for a region is the weighted average variation of each tract's entropy score differenced with the region-wide entropy as a fraction of the region's total entropy (Iceland 2004):

$$H = \frac{\hat{H} - \bar{H}}{\hat{H}}$$

where:

\hat{H} = Entropy for the region's tracts as a whole

\bar{H} = Average of the individual census tracts' values of h weighted by the population

H = Entropy Index for the region.

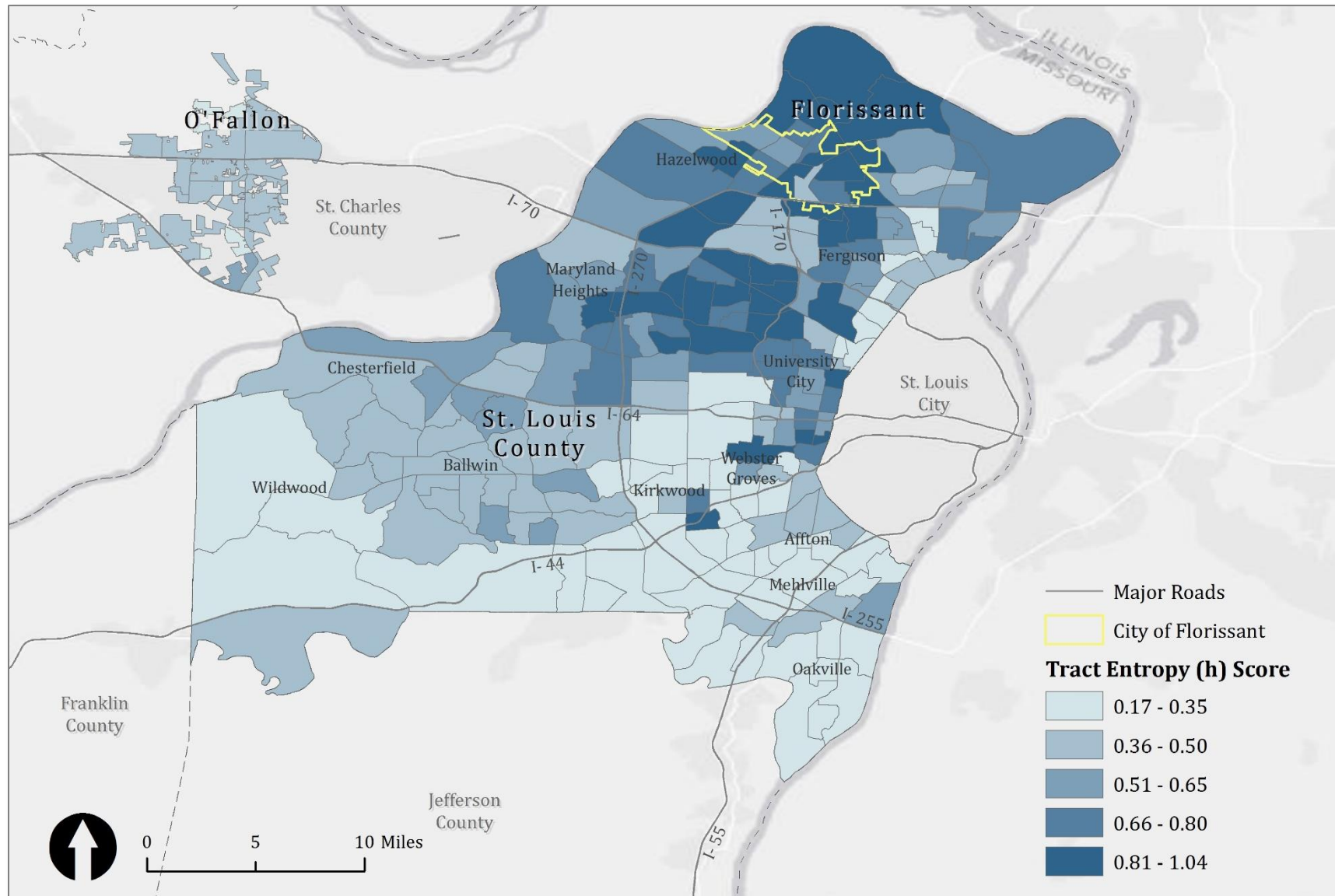
⁵⁵ Including Hispanics and non-Hispanic Asians, American Indians/Alaska Natives, Native Hawaiians/Pacific Islanders, other races and persons of two or more races.

⁵⁶ Iceland, John. "Beyond Black and White: Metropolitan Residential Segregation in Multi-Ethnic America," U.S. Census Bureau, Housing and Household Economic Statistics Division, paper presented at the American Sociological Association meetings, Chicago, Illinois, August 2002.

The EI ranges between $H = 0.0$ when all tracts have the same composition as the entire region (minimum segregation) to a maximum of $H = 1.0$ when all tracts contain one group only (maximum segregation).⁵⁷ Regions with higher values of H have less uniform racial distributions and regions with lower values of H have more uniform racial distributions.

⁵⁷ White, Michael J. 1986. "Predicted Ethnic Diversity Measures for 318 U.S. Metropolitan Areas by Census Region, 1980." *Population Index*, Vol. 52.

Diversity Index by Census Tract in St. Louis County, Florissant & O'Fallon: 2010



Source: U.S. Census 2010 SF1 Table P5

The below table gives the result of entropy calculations for St. Louis County, Florissant, and O'Fallon. The Entropy Index in St. Louis County remained at 0.34 from 2000 to 2010, reflecting differing levels of diversity in tracts throughout the County. In contrast, the Entropy Indices of 0.10 and 0.01 in Florissant and O'Fallon indicate that levels of diversity are similar in each census tract, and have remained so even as the cities (especially O'Fallon) added minority population from 2000 to 2010. Note that this finding does not indicate a high level of diversity, but rather that the racial/ethnic compositions within each census tract are similar.

Entropy Index		
2000	2010	Change
St. Louis County		
0.34	0.34	-----
City of Florissant		
0.16	0.10	-0.06
City of O'Fallon		
0.03	0.01	-0.02

Sources: U.S. Census 2000 SF1 Table P008 and 2010 SF1 Table P5

Reconciliation of the Four Segregation Indices

One important question concerns whether overall racial and ethnic segregation in St. Louis County and O'Fallon has worsened, improved, or remained about the same between 2000 and 2010. The four methodologies (Dissimilarity, Exposure, Isolation, and Entropy indices) for analyzing segregation used in this analysis allow for a possible consensus answer.

The analyses for St. Louis County show that segregation between Blacks and Whites is high and persistent (with a DI of 0.71 in 2010, up from 0.70 in 2000), and that Whites tend to be isolated with only limited exposure to Blacks and other minority groups. Black St. Louis County residents also tend to be isolated from other racial/ethnic groups, although less so than Whites. Tract-level diversity varies, with most areas of high diversity in north St. Louis County and areas of low diversity dominating the southern portion of the County.

In O'Fallon, the low level of diversity citywide (88.2% of the population is non-Hispanic White) means that minority residents tend to have high exposure to Whites, while Whites have low exposure to minorities, as do minorities residents to one another. All Dissimilarity Index values are low (0.30 or less), indicating that residential patterns within O'Fallon are relatively similar regardless of race or ethnicity. The tract-level diversity index scores and citywide Entropy Index echo these findings – diversity is low throughout O'Fallon but quite similar in each tract.

Stakeholder Input

In general, meeting participants and stakeholders think that historical discrimination by whites against minorities, particularly African Americans, is less of a problem than in the past. However a number of African Americans who reside in the study area continue to report that discrimination continues in other forms, particularly what they describe as economic discrimination.

If a meeting participant or stakeholder lived outside the St. Louis County, their perception is that discrimination and equity are generally not major problems. In contrast, participants who were St. Louis County residents who were African American were more likely to feel that discrimination and unequal distribution of public facilities and public services continue to persist.

“White flight” from the City of St. Louis and from St. Louis County was mentioned as a continuing result of racial discrimination. Homes in these jurisdictions that were previously occupied and maintained by whites that left often fell into disrepair when they are purchased and some have been converted into rental properties which become occupied by lower income households. The result is that these areas become segregated, again.

Some commenters felt that race and financial status are still the major factors causing discrimination in the area. If you are a poor resident of the study area and live in northern portion of St. Louis County, you are more likely to be non-white and African-American.

Few commenters cited specific instances of housing discrimination, but others stated that they believe that housing discrimination continues to occur. As in many regions of the USA, participants commented that housing discrimination has become more subtle.

Stakeholders’ suggestions on ways to overcome discrimination, reduce segregation, and make access to housing more equitable included:

- improve income for low-income households and households in poverty;
- balance the mixture of owner and renter occupied properties and add mixed income units;
- improved education levels;
- better cooperation between cities and counties;
- more cross-cultural exchanges and education;
- more education about ways to break the discrimination cycle;
- increased focus on discrimination toward Hispanics and other immigrant nationalities and ethnicities and increase fair housing counseling to these groups;
- renewal of efforts to educate housing consumers on housing options and about protections available to combat housing discrimination; and
- more housing counseling for homeowners, renters, and especially for landlords.

Public Investment, Infrastructure and Education

Housing availability and affordability in the study areas are linked to public resources being expended for essential services. This section addresses transportation services and the availability of safe and accessible water and sanitary sewer systems that collect, treat, and discharge wastewater.

Transportation

The St. Louis region has been a transportation crossroads since the earliest days of occupancy by Native Americans and subsequently by settlers of European origin. Today the region is connected to the other parts of the nation through interstate highways conjoined in St. Louis, serving east-west (I-70, I-64 and I-44) and north-south (I-55) travel. Interstates I-170, I-270, and I-255, plus an extensive network of Federal, State and local highways and roads provide additional connectivity.

Public Transportation (known as “Metro”) is provided by the Bi- State Development Agency through a fleet of buses, light rail and paratransit vehicles that provided 47 million trips to its patrons during 2013.⁵⁸ Metro serves the City of St. Louis County, St. Louis County (including the City of Florissant), and St. Clair County, Illinois, but does not provide service to the City of O’Fallon.⁵⁹

The Port of Metropolitan St. Louis is the northernmost location on the Mississippi River that remains open year-round and is the location that is the southernmost lock-free location for travel to the Gulf of Mexico. The study area is also served by barge service at terminals operated by the St. Louis County Port Authority. Other terminals in the St. Louis area are owned by the City of St. Louis Port District, the Jefferson County Port Authority, and the Tri-City Port Authority.⁶⁰

Air service is available in the study area from three airports located in St. Louis County⁶¹ and one located in St. Charles County⁶²:

- Lambert-St. Louis International
- Creve Coeur
- Spirit of St. Louis
- St. Charles County Smartt

The St. Louis region mirrors many other parts of the nation where investments for transportation have been primarily directed to highway system development, which is used by most residents to

⁵⁸ East-West Gateway Council of Governments, “OneSTL - Many Communities, One Future,” December 2013, Page 46.

⁵⁹ St. Louis County, Department of Planning, “Fact Book 2008-2012,” Page 63

⁶⁰ St. Louis County, Department of Planning, “Fact Book 2008-2012,” Page 72

⁶¹ St. Louis County, Missouri, Department of Planning, “Fact Book 2008-2012,” Page 61

⁶² St. Charles County, Missouri, Source:

http://transportation.sccmo.org/transportation/index.php?option=com_content&view=article&id=20%3Atransportation-maps&catid=12&Itemid=100001

satisfy their transportation needs. On an average day a resident of the region drives 24.9 miles. When compared with other similar regions, the area ranks 7 of 35, in terms of vehicle miles traveled (VMT) per capita (see the following tables and maps). While the current highway system works well with relatively low congestion levels and per-mile travel times compared to other similar regions, reliance on highways and single-occupancy automobile travel limits the mobility of households who do not own or have access to private automobiles or who are looking for alternative modes of transportation.⁶³

The U.S. Bureau of Census, American Community Survey (ACS) 2008-2012, reported that the longest mean commute times were from residents of O'Fallon (26.3 minutes), with Florissant residents spending 23.9 minutes and commuters from St. Louis County traveling 23.5 minutes. By comparison, the mean commute time for other residents of Missouri was 23.2 minutes, while the mean travel time for residents of the other 49 states was 25.4 minutes.⁶⁴

Workers who used public transit, as recorded by the ACS 2008-2012, were 2.4% from St. Louis County, 1.5% from Florissant, and 0.2% from O'Fallon. The percentages from Missouri and from the USA were 1.5% and 5.0%, respectively.⁶⁵

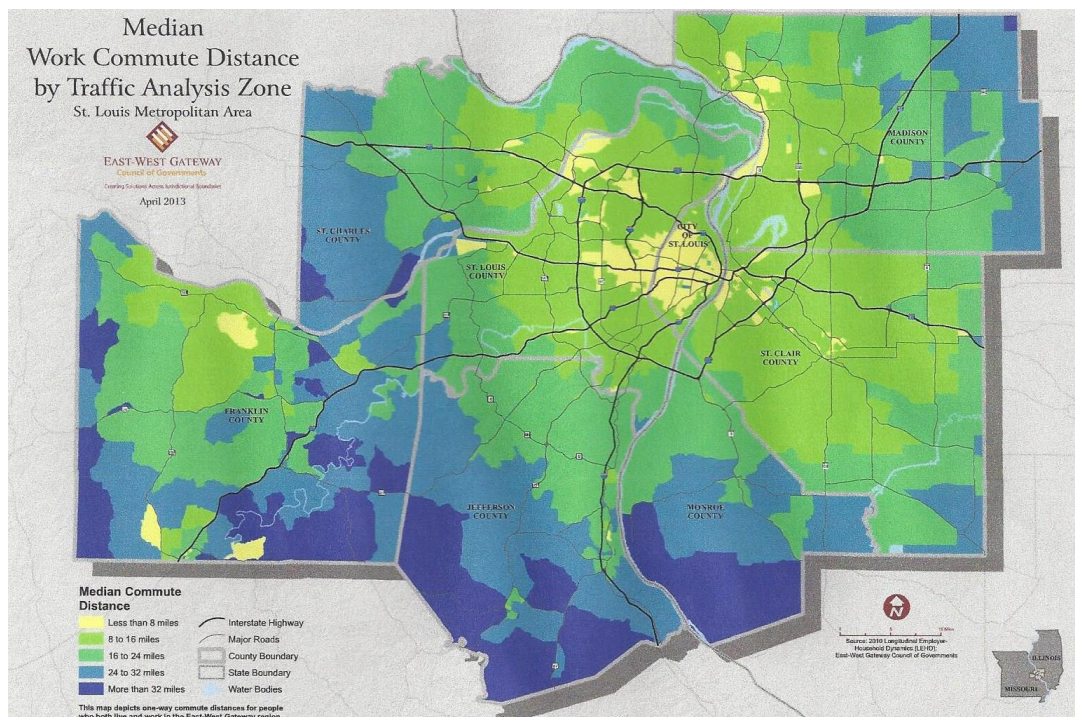
⁶³ East-West Gateway Council of Governments, "OneSTL - Many Communities, One Future," December 2013, Pages 23-24

⁶⁴ U.S. Bureau of Census, American Factfinder, American Community Survey 2008-2013, DP03 – Selected Economic Characteristics

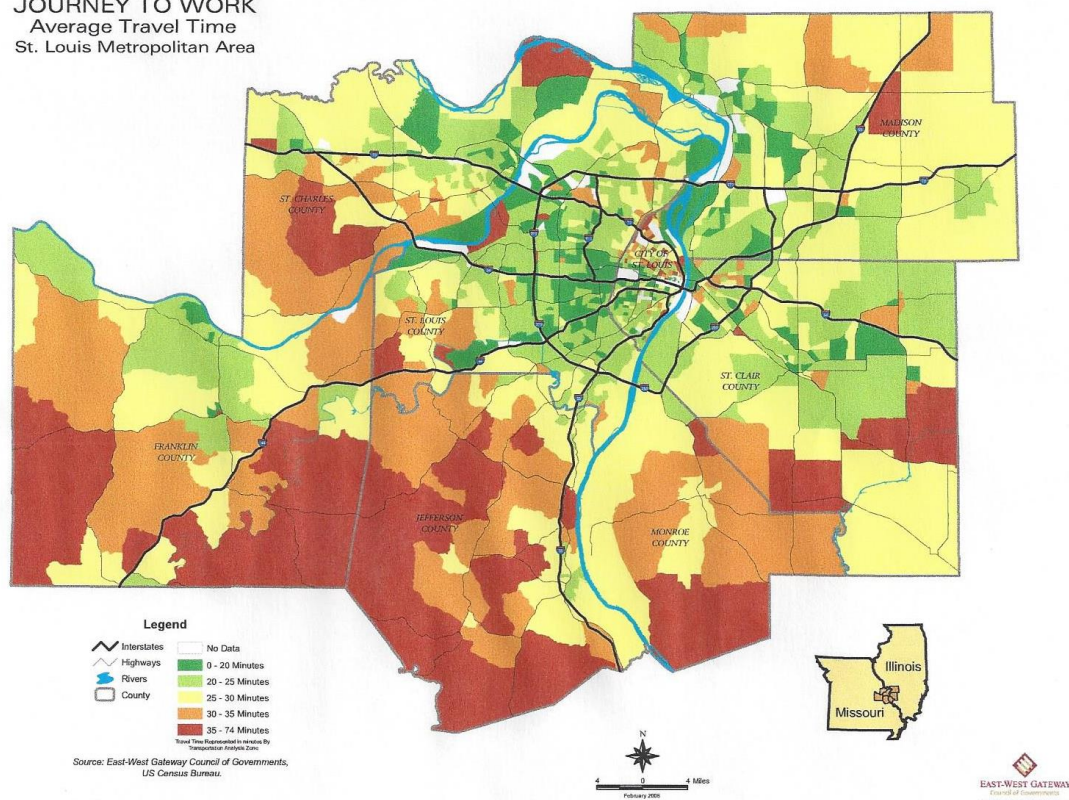
⁶⁵ U.S. Bureau of Census, American Factfinder, American Community Survey 2008-2013, DP03 – Selected Economic Characteristics

Workers 16 and Older Commuting to Work in St. Louis County, Florissant and O'Fallon, 2008-2013		
Method	Number of Commuters	Share of Commuters
St. Louis County		
Workers 16 and Older	478,292	100%
Car, Truck or Van and Driving Alone	398,934	83.4%
Car, Truck or Van and Carpooling	33,755	7.1%
Public Transportation (excluding taxis)	11,358	2.4%
Walked	7,592	1.6%
Other Means	5,305	1.1%
Worked at Home	21,348	4.5%
Mean Travel Time to Work (minutes)	23.5	n/a
City of Florissant		
Workers 16 and Older	25,558	100%
Car, Truck or Van and Driving Alone	22,137	86.6%
Car, Truck or Van and Carpooling	1,839	7.2%
Public Transportation (excluding taxis)	375	1.5%
Walked	235	0.9%
Other Means	280	1.1%
Worked at Home	692	2.7%
Mean Travel Time to Work (minutes)	23.9	n/a
City of O'Fallon		
Workers 16 and Older	40,794	100%
Car, Truck or Van and Driving Alone	36,236	88.8%
Car, Truck or Van and Carpooling	2,306	5.7%
Public Transportation (excluding taxis)	99	0.2%
Walked	239	0.6%
Other Means	324	0.8%
Worked at Home	1,590	3.9%
Mean Travel Time to Work (minutes)	26.3	n/a

Source: U.S. Bureau of Census, American Factfinder, American Community Survey 2008-2013, DP03 – Selected Economic Characteristics



JOURNEY TO WORK Average Travel Time St. Louis Metropolitan Area



One of the major themes of the St. Louis Region's sustainability plan completed in December 2013 by the East-West Gateway Council of Governments was to be "Connected." Implementation of this segment of the OneSTL plan is intended to "(d)velop and maintain a safe, accessible, multi-model transportation system that connects local communities and links the region to the nation."⁶⁶

The goals adopted for the OneSTL "Connect" theme are:

- **Goal 1: Utilize transportation assets to stimulate economic development.**
 - *Objective:* Facilitate efficient freight movement.
 - *Objective:* Support Transit Oriented Development (TOD).
 - *Objective:* Expand complete streets and Great Streets throughout the region.
- **Goal 2: Integrate transportation and land use planning.**
 - *Objective:* Prioritize projects for regional transportation investments that integrate land-use planning, economic, environmental and equity considerations.
 - *Objective:* Develop a Long Range Transportation plan that is consistent with OneSTL and national sustainability standards.
 - *Objective:* Review and revise local Transportation Improvement Program to be consistent with OneSTL and national sustainability standards.
- **Goal 3: Expand public transit accessibility and utilization.**
 - *Objective:* Increase transit ridership.
 - *Objective:* Increase access to transit.
- **Goal 4: Advance active transportation initiatives.**
 - *Objective:* Improve bicycle and pedestrian accessibility and safety through the "5 e's": education, engineering, encouragement, enforcement and evaluation.
 - *Objective:* Increase bicycle and pedestrian mode share.
- **Goal 5: Effectively manage and maximize the efficiency of existing transportation assets.**
 - *Objective:* Prioritize limited resources on rehabilitating and replacing aging infrastructure over system expansion.
 - *Objective:* Utilize transportation demand management strategies to reduce regional vehicle miles traveled (VMT).
- **Goal 6: Provide a safe and secure transportation system.**
 - *Objective:* Reduce annual fatalities and serious injuries for all transportation modes.
 - *Objective:* Improve transportation security.

⁶⁶ East-West Gateway Council of Governments, "OneSTL - Many Communities, One Future," December 2013, Page 104.

The member governments in the study area can make jobs and housing more accessible to their residents if they would implement those goals and objectives from OneSTL that are financially feasible and that contribute to a more sustainable future for the region.

The following maps reflect the current Metro transit bus routes and the MetroLink rail lines. Moving forward, particular attention should be devoted to increasing transit ridership and access to transit in unserved and underserved areas, as recommended in Goal 3 of the OneSTL plan. The objective to support Transit-Oriented Development under Goal 1 would also increase access to jobs services, and housing for the residents of the study area.

Another important goal of OneSTL that is pertinent to the AI is Goal 4, with emphasis on increasing pedestrian access. Persons who must or choose to use transit often must walk for a portion of their transit trip. Attention should be directed toward ensuring that such walking routes are accessible to persons with disabilities.

The lack of transit accessibility in O'Fallon was mentioned frequently among stakeholders and survey respondents. Policy makers in O'Fallon should reexamine this need in response to the comments received and in light of the OneSTL goals and objectives dealing with transit accessibility.

Funding for Transportation

Transportation Improvement Program⁶⁷

The Transportation Improvement Program (TIP) is a listing of transportation improvements planned by various agencies in the St. Louis metropolitan area. The Federal Government requires that the TIP must be developed and approved by an entity known as the Metropolitan Planning Organization (MPO). The East-West Gateway Council of Governments (EWGCOG), a voluntary association of local governments, has been designated by the governors of Missouri and Illinois and the U.S. Department of Transportation as the MPO for the St. Louis region.

The Council, formed in 1965, consists of more than 200 villages, cities, and counties and is the only organization of local governments that spans the entire Missouri-Illinois St. Louis region. The agency's 24-member Board of Directors consists of the area's chief local elected officials and selected citizens. Representatives of the two state transportation agencies, the Missouri Department of Transportation (MoDOT), the Illinois Department of Transportation (IDOT), Missouri Office of Administration, the Illinois Department of Commerce and Economic Opportunity, and the chairman of the Bi-State Development Agency (doing business as Metro), are non-voting members of the Board.

In the St. Louis region, the projects identified in the TIP are given priorities based on, and consistent with, the region's current long-range transportation plan developed by the EWGCOG.

⁶⁷ East-West Gateway Council of Governments, "Transportation Improvement Program 2014-2017," July 21, 2013, Page 1

The counties included in the St. Louis metropolitan planning area and in the TIP include Franklin, Jefferson, St. Charles, and St. Louis counties and the City of St. Louis in Missouri and Madison, Monroe, and St. Clair counties in Illinois.

TIP Projects - FY 2014-2017⁶⁸

The FY 2014-2017 TIP contains 822 projects (239 new and 583 reprogrammed) at a total cost of approximately \$2.08 billion in federal, state, local, and private funding. The TIP continues the region's emphasis on preserving the existing infrastructure, committing 40.7% of the total program (\$846.5 million over the next four years) to resurface and reconstruct roads, repair/replace bridges, and replace other aging transportation systems and facilities.

Nearly ten percent of the total program (\$213.4 million) is allocated to adding capacity in the form of new roads, new bridges, and new lanes on existing roads. Projects to improve the operations and/or safety of the region's transportation facilities account for \$218.2 million (10.5% of the total program). The transit category consists of \$591.7 million or 28.4 % of the total program. This category contains projects such as fixed rail expansion, MetroLink Improvements, service vehicles, operations and for providing upgrades and maintenance for non-MetroLink equipment and facilities.

Approximately \$121 million or 5.8% is dedicated to paybacks, including \$54 million to payback bonds issued for the I-64 reconstruction project. The remaining \$89.2 million or 4.3% falls under the "Other" category. This includes such projects as bike trails, sidewalk improvements, landscaping, education programs, and system enhancements.

When combined, Transit and Other (including investments for sidewalks) represent 32.7% of total programmed funds for this TIP 4-year period.

The cost of housing, when combined with the cost of transportation, represent a significant portion of the total household income for persons whom HUD classifies as very low-income (50% of Area Median Income). Attention should be given by policy-makers in the study area to allocate sufficiency funding to transit options that will help make public transportation available and affordable for these residents of the St. Louis region. This consideration is particularly important for areas that are not currently served by transit.

Stakeholder Input

A number of meeting participants stated, in various ways, that the key to a household's ability to obtain suitable and affordable housing is income and the key to adequate income is obtaining and holding a good job and having suitable, affordable, and reliable transportation to that job.

⁶⁸ East-West Gateway Council of Governments, "Transportation Improvement Program 2014-2017," July 21, 2013, Page 15

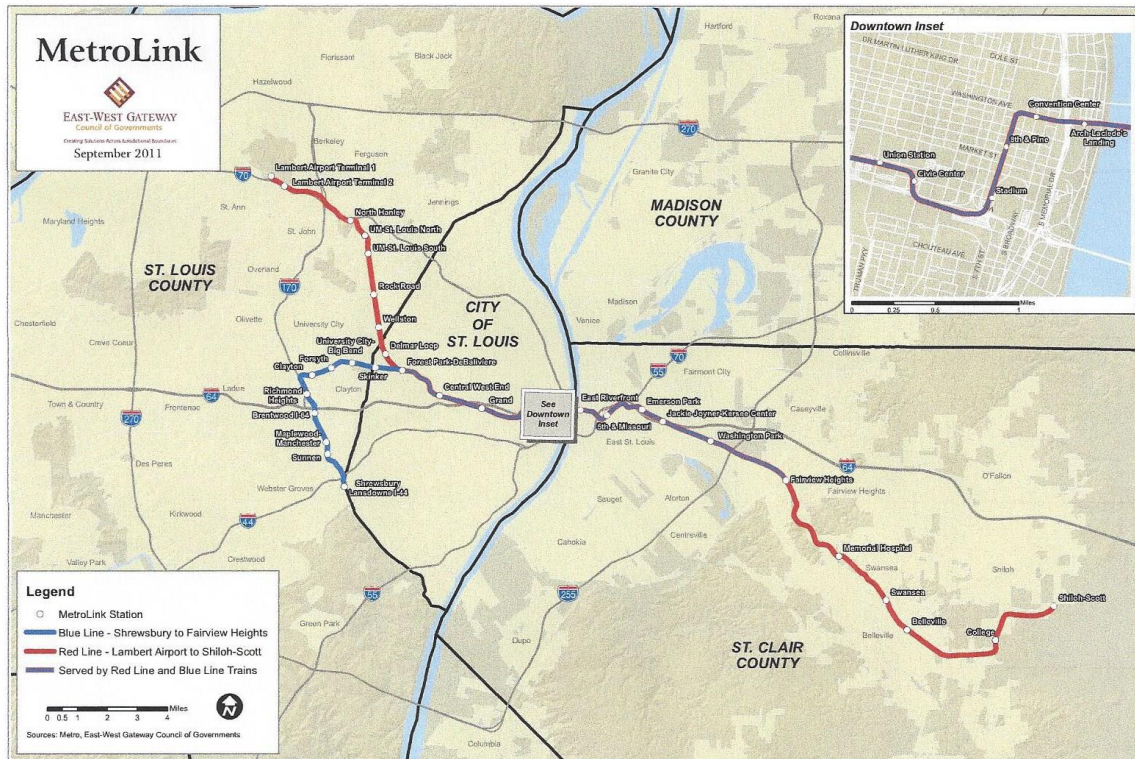
Some stakeholders from O'Fallon noted that no public transit is available in that portion of the St. Louis region and this is an impediment to obtaining suitable employment near their residence for persons in poverty and those with low incomes. Few comments were received citing transit deficiencies in St. Louis County.

Conclusion

While the study area has an extensively developed highway system, continuing reconstruction is needed due to the age of many of these highways and road.

Residents of O'Fallon need improved access to public transit. Currently they must rely on private automobiles to reach affordable housing, employment, and services; and the commute times from O'Fallon average 26.3 minutes, the longest time for residents of St. Louis County, and the cities of Florissant and O'Fallon.





Water Supply and Wastewater Treatment

Water Supply

The American Society of Civil Engineers developed a “2013 Report Card” that evaluated the infrastructure located in the State of Missouri. Overall, Missouri received a grade of C-.⁶⁹

One part of The ASCE report looked at drinking water systems in the state and gave the state a C-. The Report Card summarized the state’s water supply systems as follows:

”Missouri’s public drinking water systems will require significant investment to maintain current service levels to its citizens in the future. According to the 2007 Needs Survey, which sampled about 14 percent of Missouri’s community systems, over \$7.1 billion of financial need for maintaining the same level of service was reported by its public drinking water systems.”

The majority of the need was for transmission and distribution at approximately 68 percent (\$4.8 billion) while only 18 percent (\$1.3 billion) was for treatment facilities. The problem is evident in Missouri’s two largest cities, as seen in the growing number of water main breaks in recent years. At over 1,500 water main breaks in 2011, Kansas City broke its previous record of 1,430 in 2000. Similarly, St. Louis is seeing significant issues with its water distribution system with the average age of 55 to 65 years old for its distribution mains. This aging has created a \$680 million funding

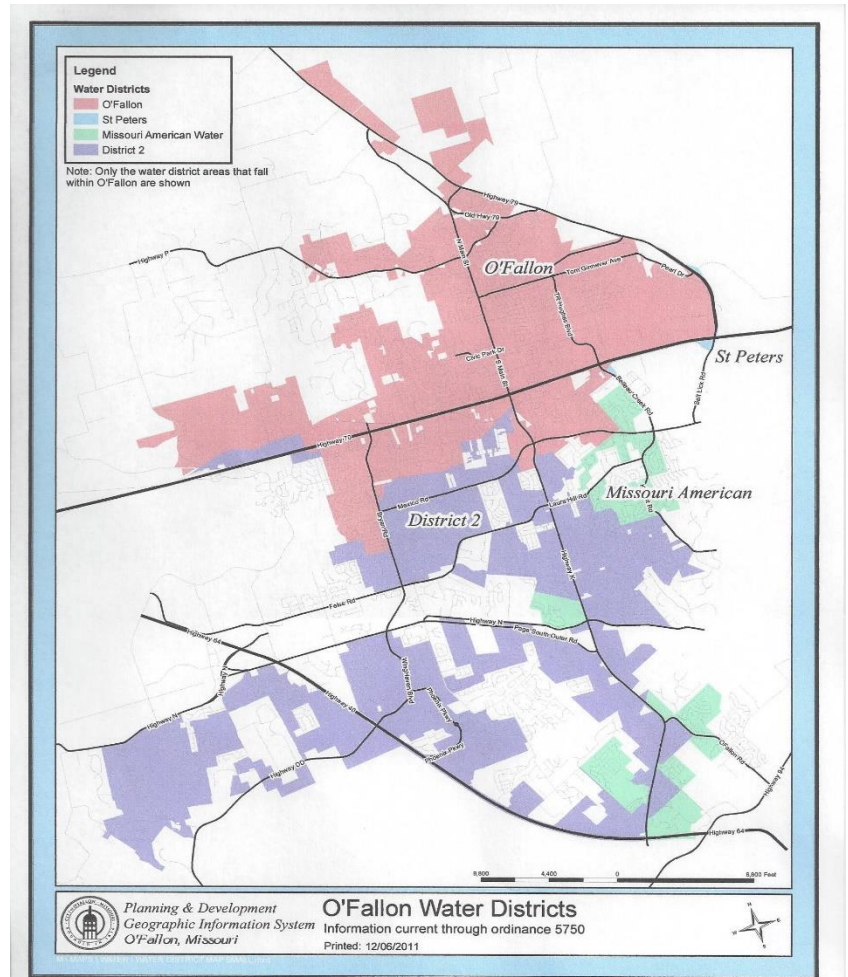
⁶⁹American Society of Civil Engineers, “2013 Report Card for Missouri’s Infrastructure”
<http://www.infrastructurereportcard.org/missouri/missouri-overview/>

gap for water systems in St. Louis based on a private report by CDM Smith. The required replacement, in addition to an annual one percent water main replacement in St. Louis, is 34 miles.”

Drinking water systems in the study area are operated by a combination of public and private operators, with Missouri American Water identified as the supplier to approximately 1.2 million residents of St. Louis, St. Charles, and Jefferson counties with an average daily usage of 180 million gallons.^{70,71}

As the largest water supplier Missouri American Water is a part of the larger American Water Works Company that serves approximately 14 million people in 40 states and parts of Canada.⁷²

Residents of the City of O’Fallon receive water from the city, from 2 other water districts and from Missouri American Water (see the following map).



⁷⁰ Metro Water Infrastructure Partnership, Source: <http://www adaywithoutwater.net>

⁷¹ American Water, Source: <http://www.amwater.com/moaw/water-quality-and-stewardship/water-quality-reports.html> and “Fact Sheet 2014.”

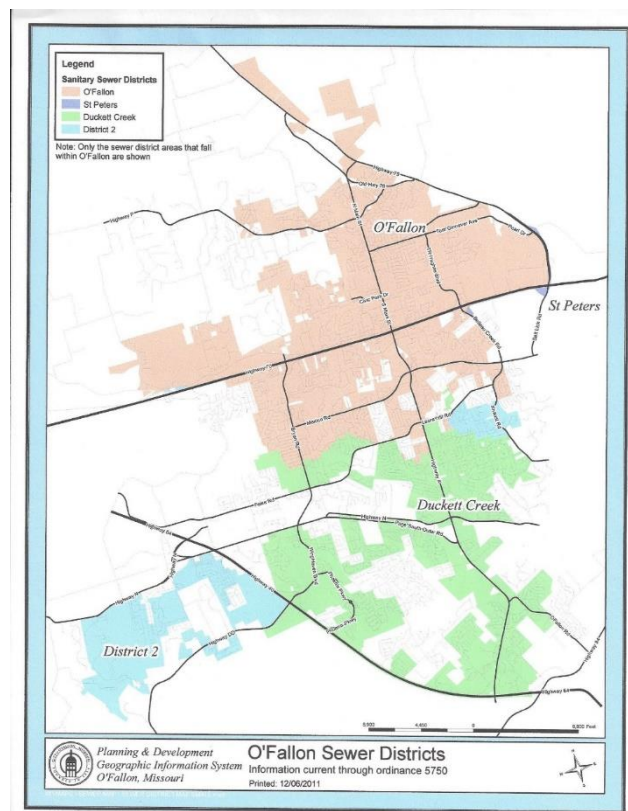
⁷² American Water Works Company, Inc., Source: <http://ir.amwaater.com>; “2013 Annual Water Quality Report: St. Louis County/St. Charles County”

Research conducted for this study did not reveal any consistent and/or recurring problems with the delivery of an adequate supply of safe drinking water in the study area. However, as the water systems are aging, long-term investments for systems updates must occur to ensure that these systems can provide safe drinking water to their customers.

Wastewater Treatment

Wastewater treatment is provided to most of the study area by the Metropolitan St. Louis Sewer District (MSD) which has a service area of 525 square miles including 62 square miles in the City of St. Louis and 462 square miles (90%) of St. Louis County. The network operated by the MSD contained 9,578 miles of collection and trunk sewers and force mains, as of October 16, 2013. Approximately 311 miles of the MSD sewers are more than 120 years old and approximately 524 miles are more than 80 years old. The MSD operates seven wastewater treatment plants that treated an average of 356 million gallons of wastewater per day from 2009-2012.⁷³

The City of O'Fallon provides sewer service to its residents and to other areas outside the city (see the following map).



The MSD is a party to a 2011 settlement agreement with the U.S. Environmental Protection Agency as a result of illegal sewage overflows of untreated sewage, including basement backups, and to reduce pollution into waterways. Under the agreement, the MSD is making \$4.7 billion in system improvements over 23 years, including spending \$100 million in a green infrastructure program targeted to low-income and minority communities that been disproportionately impacted by air water and land pollution.^{74,75}

The MSD is using a \$945 million bond issue passed by the voters of the City of St. Louis and St. Louis County in 2012 to finance work on projects that are required under the agreement with EPA.⁷⁶ Major parts of the construction include constructing large underground storage tunnels with the

⁷³ Metropolitan St. Louis Sewer District, Source: <http://www.stlmsd.com/aboutmsd>

⁷⁴ The Metropolitan St. Louis Housing and Opportunity Council, "Fair Housing Equity Assessment" for "OneSTL: Many Communities. One Future," Page 110

⁷⁵ St. Louis Business Journal, Source: <http://www.bizjournals.com/stlouis/news/2011/08/04/st-louis-msd-epa-file-47-billion.html> ; <http://www.bizjournals.com/stlouis/print-edition/2011/11/04/epa-msd-47-billion-decree-must.html> ; <http://www.bizjournals.com/stlouis/news/2013/03/27/msds-board-approves-hoelscher-as-new.html>

⁷⁶ The Metropolitan St. Louis Housing and Opportunity Council, "Fair Housing Equity Assessment" for "OneSTL: Many Communities. One Future," Page 110

longest being 9 miles in length and 28 feet in diameter, expanding sewage treatment plant capacity, and repair on sewer pipes throughout the MSD service territory, including the City of St. Louis and approximately 80% of St. Louis County.⁷⁷

The St. Louis Business Journal reported that Jack Strauss, Director of the Simon Center for Regional Economics at Saint Louis University, projected that the total project will create 25,500 jobs and boost the local economy equaling \$3.5 billion.⁷⁸

While carrying out the \$4.7 billion construction, the MSD has also increased its goal for minority-owned contractors to 25% and 5% for women-owned contractors. It also requires that construction contracts of \$500,000 or more must have at least 25% of its workforce who are minorities and 6.9% who are women.⁷⁹

Jobs created by the MSD construction project are providing employment opportunities for low-income and minority residents of the study area and increased contracting possibilities for minority and women-owned businesses.

One negative impact of the project for MSD customers who are on fixed incomes or who are very low-income will be the projected increase in sewer rates necessary to retire the bond financing for the \$4.7 billion construction project. The MSD announced in June 2012 that typical household sewer bills would increase from approximately \$29 per month to about \$44 per month.⁸⁰

Conclusion

Jobs created by the MSD construction project are providing employment opportunities for low-income and minority residents of the study area and the increased contracting possibilities for minority and women-owned businesses. The construction product will be a positive benefit who members of protected classes who are employed by the MSD construction improvements.

The projected increase in sewer rates necessary to retire the bond financing for the \$4.7 billion construction project will create a negative impacts on the budgets of MSD customers who have low incomes and/or live on fixed incomes, many of whom may be members of protected classes under the Fair Housing Act of 1968.

⁷⁷ St. Louis Business Journal, Source: <http://www.bizjournals.com/stlouis/print-edition/2013/01/18/work-in-the-st-louis-pipeline.html>

⁷⁸ St. Louis Business Journal, Source: <http://www.bizjournals.com/stlouis/print-edition/2013/01/18/work-in-the-st-louis-pipeline.html>

⁷⁹ St. Louis Business Journal, Source: <http://www.bizjournals.com/stlouis/print-edition/2013/01/18/work-in-the-st-louis-pipeline.html>

⁸⁰ St. Louis Public Radio, June 14, 2012, Source: <http://news.stlpublicradio.org/post/msd-board-expected-finalize-series-rate-increases>

Education and Schools Analysis

The presence of high quality education systems and facilities is closely connected with decision-making by individuals and families on where they choose to live. This section reports on the performance of public schools serving the residents of St. Louis County and the cities of Florissant and O'Fallon. Also explored are the relationships among educational attainment, education resources and housing choices.

Educational Attainment Levels

Total enrollment in schools located in St. Louis County (including the City of Florissant) decreased by 3.7% from 281,608 in 2000 to 270,943 in 2012.⁸¹ During the same period, persons 25 years of age and older with some college, but no degree increased from 15.1% in 2000 to 22.1% in 2012. Residents who were 25 and older who had earned Bachelor's Degrees increased from 22% in 2000 to 23.5% in 2012.⁸²

For schools serving the City of O'Fallon, total enrollment increased by 74.7% from 13,698 in 2000 to 23,934 in 2012. Persons 25 years of age and older with some college, but no degree increased from 16.1% in 2000 to 22.7% in 2012. The percentage of O'Fallon residents who had earned Bachelor's degrees increased from 20.2% in 2000 to 26.0% in 2012.⁸³

For the State of Missouri, persons in the same age group who had some college, but no degree represented 14% of the population in 2000 and 22.8% in 2012, while the percentages for the United States were 14% in 2000 and 21.3% in 2012.⁸⁴

Missouri residents who had earned Bachelor's degrees were 14.0% of the population in 2000 and 16.2% in 2012, while the percentages for the United States were 15.5% in 2000 and 17.9% in 2012.⁸⁵

Compared with the State of Missouri and the United States in 2012, persons who were 25 years of age and had some college but no degree or who had earned Bachelor's degrees represented larger percentages of such individuals in St. Louis County and in O'Fallon.

⁸¹ U.S. Census Bureau, American Factfinder, Census 2000, QT-P19; American Community Survey, 2008-2012, S1401.

⁸² U.S. Census Bureau, American Factfinder, Census 2000, QT-P20; American Community Survey, 2008-2012, S1501.

⁸³ U.S. Census Bureau, American Factfinder, Census 2000, QT-P20; American Community Survey, 2008-2012, S1501

⁸⁴ U.S. Census Bureau, American Factfinder, Census 2000, QT-P20; American Community Survey, 2008-2012, S1501

⁸⁵ U.S. Census Bureau, American Factfinder, Census 2000, QT-P20; American Community Survey, 2008-2012, S1501

State of Missouri – Oversight of Local School Districts⁸⁶

The Department of Elementary and Secondary Education (DESE) is the administrative arm of the State Board of Education of Missouri. It is primarily a service agency that works with educators, legislators, government agencies, community leaders and citizens to maintain a strong public education system. Through its statewide school-improvement activities and regulatory functions, the Department strives to assure that all citizens have access to high-quality public education. DESE does not regulate, monitor or accredit private, parochial or home schools.

The Department's responsibilities range from early childhood to adult education services. The Department employs about 1,700 people throughout the state and has a total budget of about \$5.4 billion. About 96 percent of the budget consists of state and federal funds that are distributed to local school districts and other agencies.

Local School Districts in St. Louis County/City of Florissant and Serving the City of O'Fallon⁸⁷

St. Louis County has 23 separate public school districts that are described here using organizational and performance information about each district.

The City of O'Fallon is served by three public school districts. Data similar to that presented for St. Louis County and the City of Florissant is depicted for the O'Fallon area of St Charles County.

Local School Boards, School District Descriptions, Facilities and Enrollments⁸⁸

Governing Boards

The public school districts in St. Louis County and those in St. Charles County serving the City of O'Fallon are governed by 7-member Boards of Education elected by voters in their respective districts. Education professionals provide the daily operational and instructional staff for the districts.

St. Louis County/City of Florissant School District Descriptions, Facilities and Enrollments

Twenty-three public school districts serve the residents of St. Louis County and the City of Florissant. While 22 of the 23 school districts are provide general purpose academic programs, the Special School District of St. Louis County (SSD) is a unique entity created in December 1957 to support the educational needs of children with disabilities. The SSD's role was expanded in 1966 when the district added technical education to its mission. In addition to its elected Board of

⁸⁶ Missouri Department of Elementary and Secondary, <http://www.mo.gov/government/guide-to-missouris-government/department-of-elementary-and-secondary-education> <http://www.mo.gov/government/guide-to-missouris-government/department-of-elementary-and-secondary-education>

⁸⁷ Missouri Department of Elementary and Secondary, <http://www.mo.gov/government/guide-to-missouris-government/department-of-elementary-and-secondary-education> <http://www.mo.gov/government/guide-to-missouris-government/department-of-elementary-and-secondary-education>

⁸⁸ Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcds.dese.mo.gov/guidedinquiry/Pages/District-and-School-Information.aspx>

Education, the SSD has a 22-member Governing Council created by the Missouri legislature in 1996. Each of other districts has a representative on the Council.⁸⁹

The 23 separate school districts have 7-member elected Boards of Education that are the governing bodies for the respective districts.⁹⁰ A St. Louis County map with the school districts identified is provided at the end of this section.

The table on the following page includes all 23 school districts in St. Louis County with the number of school facilities in each district, and current year (2014) enrollments compared with the State of Missouri.

The 23 school systems have 353 school facilities with the SSD having the most facilities (106) and the fewest are in Bayless, Hancock Place, and Valley Park, each having the 3 facilities.

The Rockwood District has the highest enrollment (21,612) and Brentwood had the lowest enrollment (810) of districts located in St. Louis County. The Rockwood District had the 3rd largest enrollment of all school districts in Missouri and Hazelwood ranked 6th. While not in St. Louis County, the adjacent City of St. Louis district had the 2nd largest enrollment (24,869) in Missouri.

⁸⁹ Special School District of St. Louis County, website; www.ssd.k12.mo.us

⁹⁰ St. Louis County Planning Department, "2007-2012 Fact Book, Page 72 – Website links for 23 school districts

St. Louis County Public School Facilities and Enrollment, 2014

School District	Number of School Facilities	2014 Total Enrollment	% of State Enrollment	Statewide Enrollment Ranking	Current Accreditation Status
Affton	4	2,376	0.3%	88	Accredited
Bayless	3	1,618	0.2%	120	Accredited
Brentwood	4	810	0.1%	208	Accredited
Clayton	5	2,587	0.3%	80	Accredited
Ferguson-Florissant	24	11,636	1.3%	15	Accredited
Hancock Place	3	1,444	0.2%	132	Accredited
Hazelwood	32	17,968	2.0%	6	Accredited
Jennings	8	2,537	0.3%	82	Provisional
Kirkwood	9	5,608	0.6%	33	Accredited
Ladue	6	4,094	0.5%	52	Accredited
Lindbergh	8	6,041	0.7%	28	Accredited
Maplewood-Richmond Heights	4	1,200	0.1%	151	Accredited
Mehlville	17	10,757	1.2%	19	Accredited
Normandy	9	2,939	0.3%	76	Unaccredited
Parkway	28	17,157	1.9%	10	Accredited
Pattonville	11	5,650	0.6%	32	Accredited
Ritenour	9	6,369	0.7%	25	Accredited
Riverview Gardens	13	4,871	0.6%	38	Unaccredited
Rockwood	30	21,612	2.4%	3	Accredited
Special School Dist. of St. Louis County	106	3,921	0.4%	56	Accredited
University City	7	3,030	0.3%	71	Accredited
Valley Park	3	4,409	0.5%	47	Accredited
Webster Groves	10	2,376	0.3%	88	Accredited
Total	353	141,010	15.9%	N/A	N/A

Source: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>

The following table lists the most currently available (2013) demographics of student enrollment in St. Louis County school districts.

Demographics of Enrollment in St. Louis County Public School Districts, 2013

School District Name	Student Race/Ethnicity				
	White %	Black %	Hispanic %	Asian %	Indian %
Affton	79.8%	7.4%	4.7%	2.6%	0.2%
Bayless	70.9%	12.4%	2.6%	11.3%	0.1%
Brentwood	65.4%	22.2%	3.8%	3.9%	0.0%
Clayton	65.7%	18.7%	3.3%	10.9%	0.1%
Ferguson-Florissant	14.2%	78.2%	2.4%	0.6%	0.1%
Hancock Place	70.1%	17.3%	4.9%	0.7%	0.4%
Hazelwood	23.9%	72.0%	2.1%	1.0%	0.1%
Jennings	0.6%	99.2%	0.2%	0.0%	0.0%
Kirkwood	77.2%	14.2%	2.7%	2.2%	0.2%
Ladue	63.4%	15.7%	4.4%	11.8%	0.3%
Lindbergh Schools	86.4%	4.5%	2.7%	4.0%	0.2%
Maplewood-Richmond Heights	57.0%	31.8%	3.6%	1.2%	0.2%
Mehlville	82.4%	8.4%	3.0%	3.3%	0.2%
Normandy	1.4%	97.0%	1.1%	0.4%	0.0%
Parkway	64.8%	14.9%	4.6%	11.4%	0.2%
Pattonville	54.9%	31.6%	7.7%	4.0%	0.2%
Ritenour	39.7%	39.0%	14.6%	2.3%	0.3%
Riverview Gardens	1.3%	96.9%	0.5%	1.2%	0.1%
Rockwood	80.2%	9.9%	2.5%	6.1%	0.1%
Special School District of St. Louis County	53.5%	41.3%	1.6%	1.5%	0.2%
University City	12.6%	82.5%	2.3%	1.4%	0.2%
Valley Park	61.9%	22.7%	5.9%	5.1%	0.2%
Webster Groves	74.3%	18.7%	2.1%	2.3%	0.4%

Source: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcds.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>

City of O'Fallon School District Descriptions, Facilities and Enrollments

The next table lists all 3 school districts in St. Charles County that serve the City of O'Fallon, the number of school facilities in each district, and current year (2014) enrollments compared with the State of Missouri. A map at the end of this section identifies the location of the districts.

The 3 school districts have 61 school facilities – 24 facilities in Ft. Zumwalt, 21 in Francis Howell and 16 in Wentzville.

The Ft. Zumwalt District has the highest enrollment (18,382), followed by Francis Howell (17,462) and Wentzville (14,223). The total enrollments of these districts rank numbers 5, 8, and 11,

respectively in the State of Missouri. All three school districts are currently accredited by the Missouri Department of Elementary and Secondary Education.

O'Fallon Public School Facilities and Enrollment, 2014					
School District Name	Number of School Facilities	Total Enrollment	Share of State Enrollment	Statewide Enrollment Ranking	Current Accreditation Status
Ft. Zumwalt	24	18,382	2.1%	5	Accredited
Francis Howell	21	17,462	2.0%	8	Accredited
Wentzville	16	14,223	1.6%	11	Accredited
Total	61	50,067	5.6%	N/A	N/A

Source: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcds.dese.mo.gov/guidedinquiry/Pages/District-and-School-Information.aspx>

The following table lists the most current (2013) demographics of student enrollment in school districts serving the City of O'Fallon.

Demographics of Enrollment in O'Fallon Public School Districts, 2013					
School District Name	Student Race/Ethnicity				
	White %	Black %	Hispanic %	Asian %	Indian %
Ft. Zumwalt	85.1%	7.2%	2.7%	3.4%	0.1%
Francis Howell	84.2%	5.5%	3.8%	3.1%	0.2%
Wentzville	85.7%	7.8%	3.1%	2.0%	0.4%

Source: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcds.dese.mo.gov/guidedinquiry/Pages/District-and-School-Information.aspx>

School District/School/Student Performance

School and school district performance data is used in the accreditation process across the nation. Standard measures used include graduation rates, dropout rates, Annual Yearly Progress under the Federal "No Child Left Behind" requirements, and other measures applied from state-to-state.

Selected performance data for the school districts located in St. Louis County and those serving O'Fallon are presented in the following tables, compared with the State of Missouri, and the United States.

Graduation Rates – 2013

The State of Missouri average graduation rate for public school districts in 2013 was 85.6%. Seventeen of the 23 districts in St. Louis County exceeded the state average and 19 surpassed the

latest national average (80.0%). The highest graduation rate among school districts in St. Louis County was Clayton (99.5%) and the lowest rate was Normandy (45.4%).

All three of the school districts serving the City of O'Fallon exceeded the state average and national averages with graduation rates of 91.3% in Ft. Zumwalt, 97.1% in Francis Howell, and 95.5% in Wentzville.

Dropout Rates – 2013

High School dropout rates in St. Louis County ranged from 0.0% in the Hancock Place district to 24.7% in Normandy. When looking at all districts in St. Louis County except Normandy, the highest rates were Riverview (6.6%) and Ferguson-Florissant (5.9%). Eighteen of the districts were ranged from 0.0% to 3.7%, with 17 districts having dropout rates less than the 2.9% state average. Nineteen districts had dropout rates lower than the 3.3% national average.

High School dropout rates for the districts serving O'Fallon were very low for all three districts at 1.8% in Ft. Zumwalt, 0.7% in Francis Howell, and 1.0% in Wentzville.

Adequate Yearly Progress (AYP) – 2011

The most recent data posted by the State of Missouri for this measure is from 2011. The data show that only one St. Louis County school district (Brentwood) was in compliance with AYP. The data also showed that 18 districts had received AYP sanctions for at least 8 years. While not making progress for one specific year is somewhat troubling for a district, a greater concern occurs when districts are under multi-year sanctions for non-compliance with AYP. Non-compliance can ultimately affect the receipt of Federal funding and the knowledge of the loss of funding for schools may affect where people choose to live.

The data show that none of the three districts serving O'Fallon were in compliance with AYP. The data also showed that all 3 districts had received AYP sanctions for at least 8 years.

While not making progress for one specific year is troubling for a district, a greater concern occurs when districts are under multi-year sanctions for non-compliance with AYP. Non-compliance can ultimately affect the receipt of Federal funding and the knowledge of the loss of funding for schools may affect where people choose to remain in the current housing or to purchase or rent housing.

ACT Scores – 2013

The State of Missouri tracks composite ACT scores for all students, schools, and districts. The standardized test is used, in part, as a tool in college admission decisions and in the award of scholarships. The following tables present the ACT scores for school districts in St. Louis County and for the districts serving the City of O'Fallon.

In St. Louis County, 2013 composite school district ACT scores ranged from 15.7 (Riverview Gardens) to 25.3 (Clayton). Eleven (47.8%) of the 23 districts had scores that exceeded the State of Missouri average score (21.60) and 13 districts (56.5%) exceeded the national average score (20.9).

All three districts serving O’Fallon exceeded the state and national averages with composite scores of 22.4 in Ft. Zumwalt, 22.7 in Francis Howell, and 22.7 in Wentzville.

Homebuyers and renters often consult standardized national tests scores like ACT as a reference on how well schools and districts perform. With only 47.8% of the districts in St. Louis County exceeding the State average ACT score in 2013, this performance factor could limit where persons may choose to live or may serve as a factor in their choosing where to live. High test score in school districts serving O’Fallon are a positive factor in influencing housing choices in those locations.

St. Louis County Public School Performance Indicators, 2013					
School District	2013 Graduation Rate	2013 Dropout Rate	2011 AYP* Status	Years Receiving AYP Sanctions	2013 Composite ACT Score
Afton	94.1%	1.6%	Not Met	5	21.4
Bayless	91.0%	2.9%	Not Met	8	21.0
Brentwood	98.4%	0.4%	Met	4	23.7
Clayton	99.5%	0.0%	Not Met	4	25.3
Ferguson-Florissant	79.4%	5.9%	Not Met	9	18.1
Hancock Place	97.3%	0.0%	Not Met	8	20.0
Hazelwood	89.4%	2.2%	Not Met	8	18.0
Jennings	84.7%	2.6%	Not Met	8	16.7
Kirkwood	98.4%	0.4%	Not Met	8	23.9
Ladue	97.9%	0.5%	Not Met	8	25.1
Lindbergh	96.1%	1.1%	Not Met	4	24.0
Maplewood-Richmond Heights	93.3%	0.6%	Not Met	8	19.6
Mehlville	95.1%	1.1%	Not Met	8	22.6
Normandy	45.5%	24.7%	Not Met	8	16.8
Parkway	95.7%	1.1%	Not Met	8	22.8
Pattonville	90.3%	2.5%	Not Met	6	22.1
Ritenour	84.6%	3.7%	Not Met	8	18.7
Riverview Gardens	64.0%	6.6%	Not Met	8	15.7
Rockwood	96.4%	1.0%	Not Met	8	23.5
Special School Dist. of St. Louis County	94.7%	0.8%	Not Met	8	16.6
University City	67.3%	4.8%	Not Met	8	18.1
Valley Park	95.1%	0.7%	Not Met	8	22.1
Webster Groves	97.0%	0.8%	Not Met	8	23.4
State of Missouri	85.6%	2.9%**	N/A	N/A	21.6
United States	80.0%	3.3%**	N/A	N/A	20.9

*AYP = Adequate Yearly Progress **2011-2012

Sources: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>; United States Department of Education, National Center for Educational Statistics, “Digest of Education Statistics, 2013,” http://nces.ed.gov/programs/digest/d13/tables/dt13_219.70.asp; ACT (Formerly American College Testing), <http://www.act.org/newsroom/data/2013/states.html>

City of O'Fallon Public School Performance Indicators, 2013					
School District Name	2013 Graduation Rate	2013 Dropout Rate	2011 AYP* Status	Years Receiving AYP Sanctions	2013 Composite ACT Scores
Ft. Zumwalt	91.3%	1.8%	Not Met	8	22.4
Francis Howell	97.1%	0.7%	Not Met	8	22.7
Wentzville	95.5%	1.0%	Not Met	8	22.7
State of Missouri	85.6%	2.9%**	N/A	N/A	21.6
United States	80.0%	3.3%**	N/A	N/A	20.9

*AYP = Adequate Yearly Progress **2011-2012

Sources: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>; United States Department of Education, National Center for Educational Statistics, "Digest of Education Statistics, 2013, http://nces.ed.gov/programs/digest/d13/tables/dt13_219.70.asp; ACT (Formerly American College Testing), <http://www.act.org/newsroom/data/2013/states.html>

Missouri School Improvement Program (MSIP)

The state of Missouri created the Missouri School Improvement Program (MSIP) in 1990 to serve as the state's school accountability system that is used to review and accredit public school districts. Annual Performance Reports (APRs) are produced by MSIP for every public school and district, with the State Board of Education making the final classification determinations for schools district.

Twenty-one of the 23 school districts in St. Louis County are currently accredited under MSIP. Only 2 public school districts in Missouri are currently unaccredited and both are located in St. Louis County: Normandy and Riverview Gardens.⁹¹ While having 2 unaccredited districts is a serious concern, the presence of 21 accredited districts in St. Louis County is a positive factor in the availability of good schools as a consideration in making housing choices.

The next table contains a summary of the MSIP 2013 ratings for all 23 school districts in St. Louis County. The overall ratings are derived from scores combined from separate evaluations of performance on the following items:⁹²

⁹¹ Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>

⁹² Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>; 2013 LEA Annual Performance Report (APR) – Final

<u>MSIP Standards</u>	<u>Possible Score</u>
• Academic Achievement	56
• Subgroup Achievement	14
• College and Career Ready	30
• Attendance	10
• Graduation Rate	30
Total	140

As noted earlier, two districts in St. Louis County are unaccredited at this time: Normandy and Riverview Gardens, which had the lowest MSIP scores: Normandy – 15.5 points and 11.1%; Riverview Gardens – 40 points and 28.6%.

The Missouri State Board of Education acted on February 18, 2014 to impose financial oversight over the Normandy School District. All expenditures, contracts, financial obligations and any other actions with fiscal implications must be approved by the Missouri Department of Elementary and Secondary Education through the remainder of 2014. The State Board also directed the Missouri Department of Elementary and Secondary Education Commissioner to appoint a Transition Task Force to develop a detailed plan for the operation of the Normandy schools starting July 2014, if the state legislature fails to appropriate additional funds for the district and if the district lapses.⁹³

In March 2014, the State Board also approved a plan for future local school district interventions by the State to deal with situations similar to the Normandy district. The plan includes a tiered structure for accreditation to replace the existing system which uses major classifications: accredited/provisional/unaccredited.⁹⁴

⁹³ Missouri Department of Elementary and Secondary Education, <http://dese.mo.gov/communications/news-releases>, February 18, 2014.

⁹⁴ <http://dese.mo.gov/sites/default/files/supportandintervention.pdf>

Missouri School Improvement Program (MSIP) Scores for St. Louis County Public Schools, 2013

School District	MSIP Score	% of Total Possible Points*	School District	MSIP Score	% of Total Possible Points*
Affton	132.0	94.3%	Mehlville	129.5	92.5%
Bayless	111.0	79.3%	Normandy	15.5	11.1%
Brentwood	140.0	100.0%	Parkway	139.5	99.6%
Clayton	138.5	98.9%	Pattonville	116.0	82.9%
Ferguson-Florissant	97.0	69.3%	Ritenour	100.5	71.8%
Hancock Place	124.0	88.6%	Riverview Gardens	40.0	28.6%
Hazelwood	119.5	85.4%	Rockwood	130.0	92.9%
Jennings	92.0	65.7%	Special School District of St. Louis County	92.5	66.1%
Kirkwood	137.5	98.2%	University City	93.5	66.8%
Ladue	138.5	98.9%	Valley Park	125.0	89.3%
Lindbergh	139.0	99.3%	Webster Groves	136.5	97.5%
Maplewood-Richmond Heights	124.0	88.6%			

*Total possible points = 140.

Source: Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>; 2013 LEA Annual Performance Report (APR) – Final

All three school districts serving O'Fallon achieved scores that exceeded 92% under the MSIP system, as depicted in the table below.

Missouri School Improvement Program (MSIP) Scores for O'Fallon Public Schools, 2013		
School District	MSIP Score	% of Total Possible Points*
Francis Howard	135.0	96.4%
Ft. Zumwalt	130.0	92.9%
Wentzville	135.0	96.4%

*Total possible points = 140.

Source: Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx>; 2013 LEA Annual Performance Report (APR) – Final

Average Expenditures

A national statistic frequently used when comparing the relative wealth of school districts is the expenditure per day of attendance.

The next table reports that 16 (69.6%) of the 23 school districts in St. Louis County spent more per Average Daily Attendance (ADA) in 2013 than the average for the State of Missouri (\$9,839.67). Thirteen districts (56.5%) had average expenditures that exceeded the latest national average projection (\$11,169) available from the U.S. Department of Education.⁹⁵

The average expenditure amounts ranged from \$7,919 in the Bayless district to \$17,721 for Clayton. The data for the Special School District, while included, was not considered in the comparison with the other districts due to the unique varieties of students that it serves and the programs that it provides.

For the school districts serving O'Fallon, one of the three school districts spent more per Average Daily Attendance (ADA) in 2013 than the average for the State of Missouri (\$9,840). None of the three districts had average expenditures that exceeded the latest national average projection (\$11,169) available from the U.S. Department of Education.⁹⁶

Districts with higher average spending may have more robust tax bases to fund their schools. Such circumstances may result in improved facilities, additional equipment and technology, and enhancements to basic curricula. Contrarily, some systems may be operating inefficiently, resulting in higher average cost without concomitantly increasing the quality of school programming. This assessment does attempt to evaluate systems using these criteria. However, when including average expenditures with other performance factors, a better picture of overall school quality might be made.

⁹⁵ U.S. Department of Education, National Center for Education Statistics,
http://nces.ed.gov/programs/projections/projections2020/tables/table_19.asp?referrer=list

⁹⁶ U.S. Department of Education, National Center for Education Statistics,
http://nces.ed.gov/programs/projections/projections2020/tables/table_19.asp?referrer=list

Average Expenditure per Average Daily Attendance in St. Louis County Public Schools, May 4, 2014

School District	Average Expenditure	% of State Average	School District	Average Expenditure	% of State Average
Affton	\$11,071	112.5%	Normandy	\$11,994	121.9%
Bayless	\$7,919	80.5%	Parkway	\$11,833	120.3%
Brentwood	\$16,016	162.8%	Pattonville	\$14,019	142.5%
Clayton	\$17,721	180.1%	Ritenour	\$9,609	97.7%
Ferguson-Florissant	\$11,272	114.6%	Riverview Gardens	\$9,407	95.6%
Hancock Place	\$10,216	103.8%	Rockwood	\$9,645	98.0%
Hazelwood	\$10,298	104.7%	Special School Dist. of St. Louis County**	----	----
Jennings	\$10,688	108.6%	University City	\$12,681	128.9%
Kirkwood	\$12,027	122.2%	Valley Park	\$11,795	119.9%
Ladue	\$12,350	125.5%	Webster Groves	\$11,734	119.3%
Lindbergh	\$9,510	96.6%	State of Missouri	\$9,840	100.0%
Maplewood-Richmond Heights	\$14,576	148.1%	United States*	\$11,169	112.0%
Mehlville	\$8,612	87.5%			

*2012-2013 projection

**Not shown because average expenditures include costs of serving children enrolled in other school districts.

Sources: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx> and U.S. Department of Education, National Center for Education Statistics, http://nces.ed.gov/programs/projections/projections2020/tables/table_19.asp?referrer=list

Average Expenditure per Average Daily Attendance in St. Louis County Public Schools, May 4, 2014

School District	Average Expenditure	% of State Average	% of National Average
Francis Howell	\$10,713	80.5%	95.9%
Ft. Zumwalt	\$9,782	162.8%	87.6%
Wentzville	\$9,077	180.1%	81.3%
State of Missouri	\$9,840	100.0%	88.1%
United States*	\$11,169	112.0%	100.0%

*2012-2013 projection

Sources: Missouri Department of Elementary and Secondary Education, School District and School Information, <http://mcde.dese.mo.gov/guided inquiry/Pages/District-and-School-Information.aspx> and U.S. Department of Education, National Center for Education Statistics, http://nces.ed.gov/programs/projections/projections2020/tables/table_19.asp?referrer=list

Free and Reduced Lunches (F&RL)

In addition to average expenditures per ADA, another measure of wealth is the percentage of free and reduced cost lunches in individual schools. The percentage of free and reduced lunches in a school is directly proportional to the number of low income households represented in the student population of that school. Simply stated, in general, the higher the number of low income students attending a school, the higher the number and percentage of free and reduced lunches at the school.

The State of Missouri reported that 245 schools in St. Louis County provided F&RL during 2013. The F&RL percentage ranged from 7.6% for Conway Elementary in the Ladue District to 99.0% in Lewis and Clark Elementary in Riverview Gardens.

From the total 245 schools, 141 (57.55%) had under 50% free and reduced lunches while the remaining 104 (42.45%) had more than 50%.

The State of Missouri also reported that 56 schools in the three school districts serving the **City of O'Fallon** provided F&RL during 2013. The F&RL percentage ranged from 7.8% for Francis Howell High School in the Francis Howell District to 49.0% for Dardenne Elementary of the Ft. Zumwalt District. All 56 schools (100.0%) had less than 50% of their students who received free and reduced lunches.

Free and Reduced Lunches in St. Louis County and O'Fallon, 2013				
Share of Students with Free & Reduced Lunch	St. Louis County		City of O'Fallon	
	Number of Schools	Percentage of Schools	Number of Schools	Percentage of Schools
1.0%-9.9%	8	3.3%	2	3.6%
10.0%- 19.9%	63	25.7%	20	35.7%
20.0% - 29.9%	31	12.7%	23	41.1%
30.0% - 39.9%	15	6.1%	5	8.9%
40.0% - 49.9%	24	9.8%	6	10.7%
50.0% - 59.9%	20	8.2%	0	0.0%
60.0% - 69.9%	14	5.7%	0	0.0%
70.0% - 79.9%	21	8.6%	0	0.0%
80.0% - 89.9%	29	11.8%	0	0.0%
90.0% - 100.0%	20	8.2%	0	0.0%
Total	245	100.0%	56	100.0%

Source: Missouri Department of Elementary and Secondary Education, School District and School Information: <http://mcds.dese.mo.gov/guidedinquiry/Pages/District-and-School-Information.aspx>

Stakeholder Input

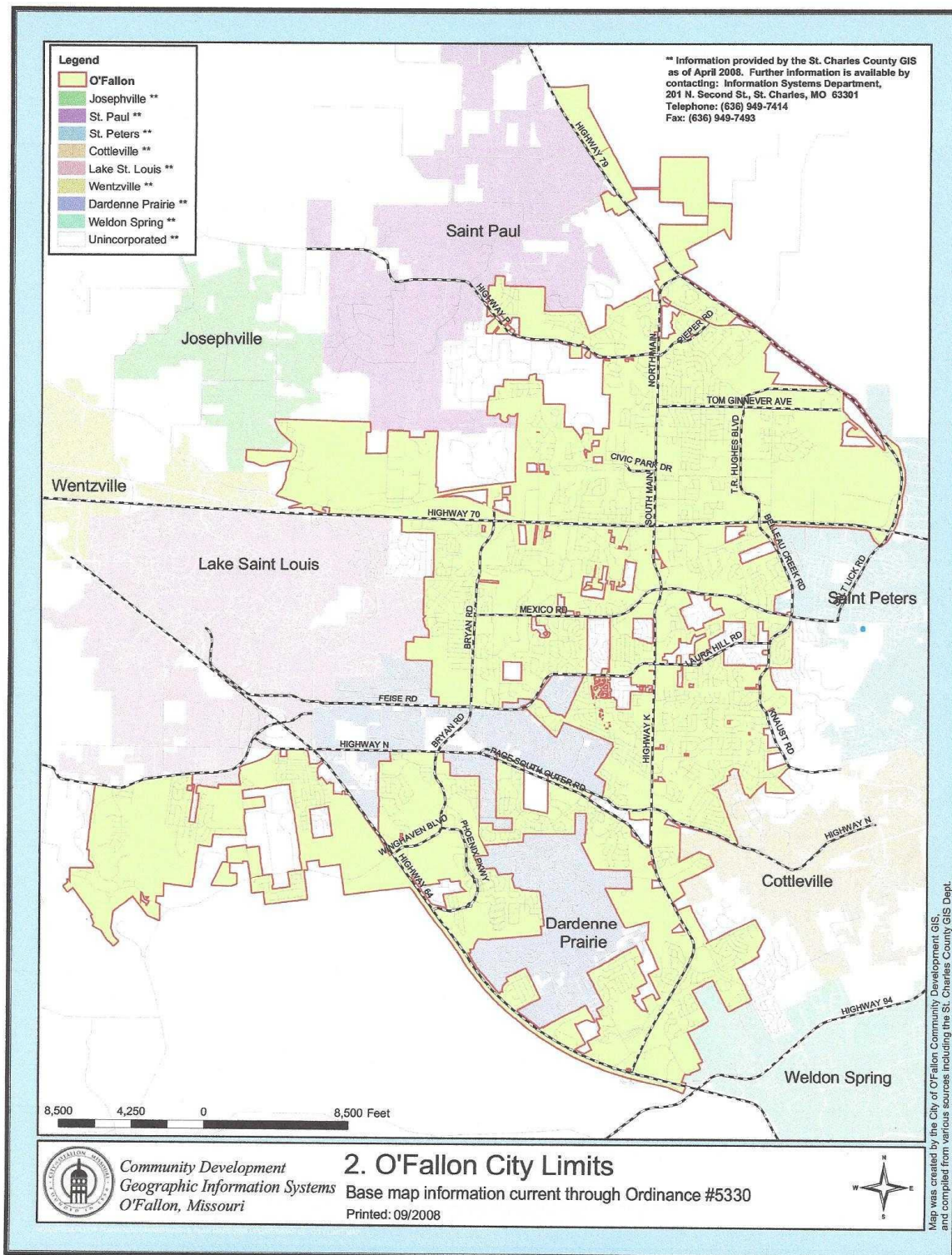
Comments received on this topic indicated that facilities and services were provided evenly and equitably. Like the topic of discrimination, commenters who lived out of St. Louis County tended to feel this way, while it was more typical for a commenter who lived in St. Louis County to believe that there were some inequities. Some commenters had the opinion that North County in St. Louis County has suffered disinvestment through the years and has been neglected when funding was allocated.

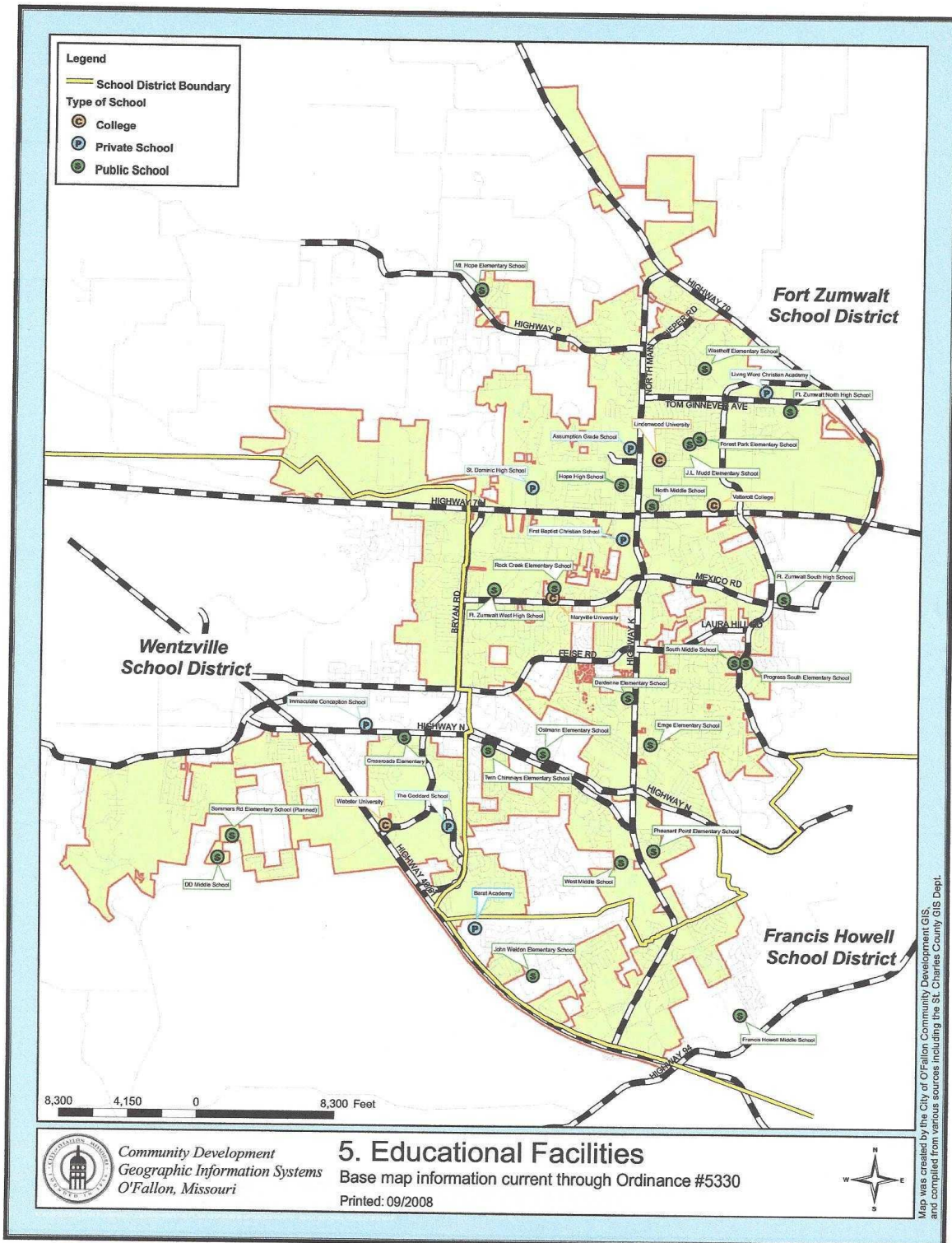
Conclusion

Public school systems in the study area vary greatly in their sizes and performance as judged by the State of Missouri School Improvement Program (MSIP). Overall, the school districts serving residents of St. Louis County scored lower than the districts serving O'Fallon under the MSIP performance evaluation system.

The presence of underperforming schools and school districts can pose barriers to housing choice for households who may not have the economic ability to locate in areas where school performance is higher.







Access to Areas of Opportunity

This section analyzes St. Louis County (including Florissant) and O'Fallon using a methodology developed by HUD's Office of Policy Development and Research to "quantify the degree to which a neighborhood offers features commonly associated with opportunity."⁹⁷ For each block group in the U.S., HUD provides a score on six "opportunity dimensions," including poverty, school proficiency, labor market engagement, jobs access, transit access, and exposure to health hazards. HUD's index scores are calculated based on the following:

- Poverty index – family poverty rates and share of households receiving public assistance;
- School proficiency index – school-level data regarding student performance on state exams;
- Labor market engagement index – employment levels, labor force participation and educational attainment;
- Jobs access index – distance to job locations and labor supply levels;
- Transit access index – distance to nearest rail or bus transit station or stop; and
- Health hazards exposure index – distance to facilities releasing toxic chemicals and levels of toxicity, according to the Environmental Protection Agency (EPA).

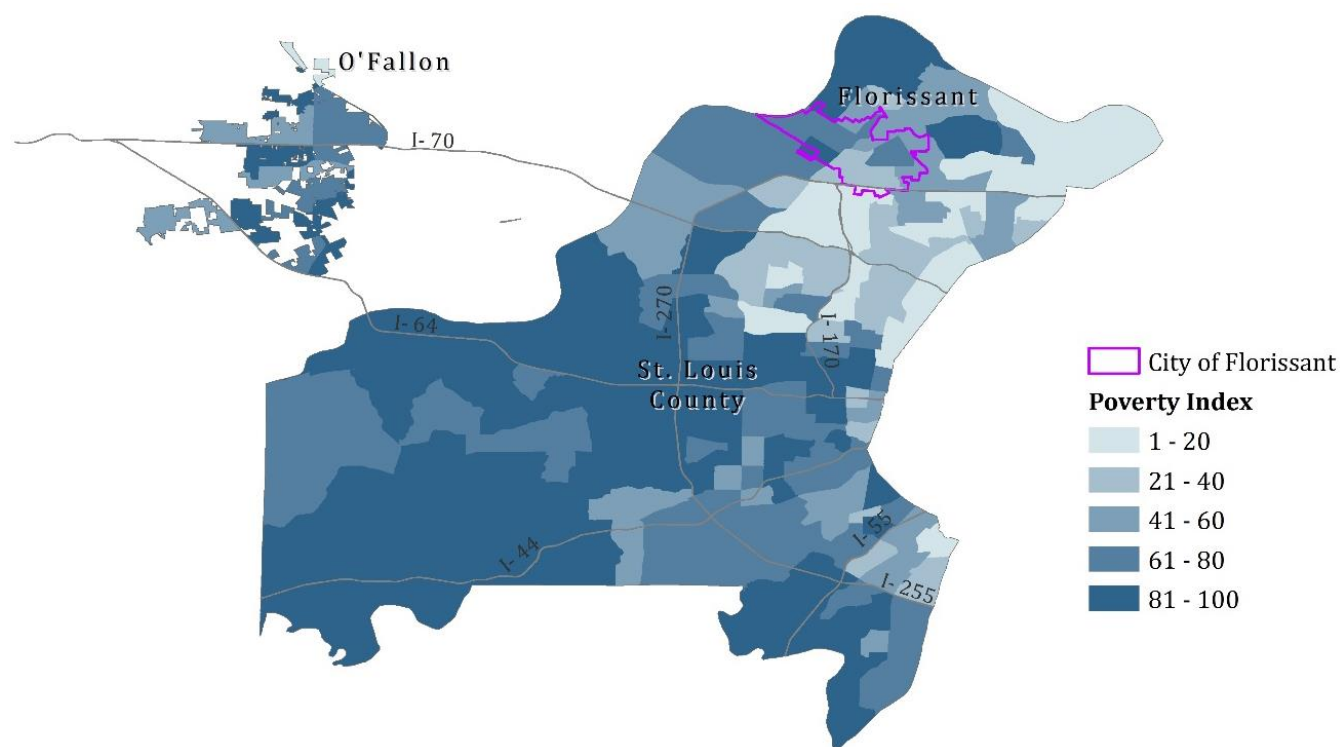
For each block group, a value is found for each of the six indices; results are then standardized on a 0 to 100 scale based on relative ranking within the metro area (or non-metro balance of the state). For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics.

The maps that follow show the HUD-provided opportunity scores for block groups in St. Louis County and O'Fallon. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity. For the first three indices – poverty, school proficiency, and labor market engagement – lowest opportunity areas are in north St. Louis County and highest in central and west St. Louis County. Ten block groups have index values under 10 for each of these indicators, located in tracts 2141.00, 2218.00, and 2136.00.

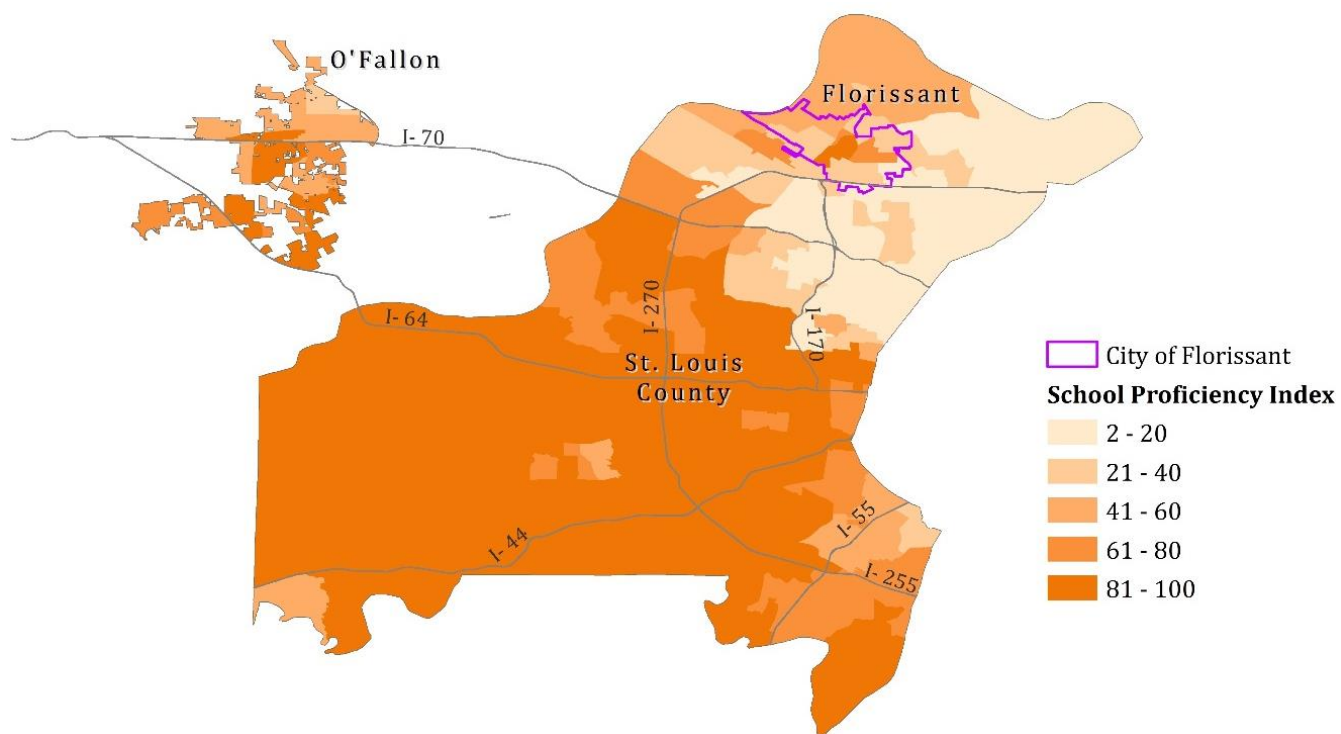
Jobs access varies, with each part of the County having a mix of high and low opportunity tracts. Transit access is better the closer a tract is to the City of St. Louis. The southwest and northeast parts of the County lack transit access, as does the City of O'Fallon. Exposure to environmental hazards is not a major issue for the majority of the study area, and least exposure is in the southwest St. Louis County/Wildwood area and in O'Fallon.

⁹⁷ HUD Office of Policy Development and Research, "FHEA Data Documentation," Draft. 2013. p. 4.

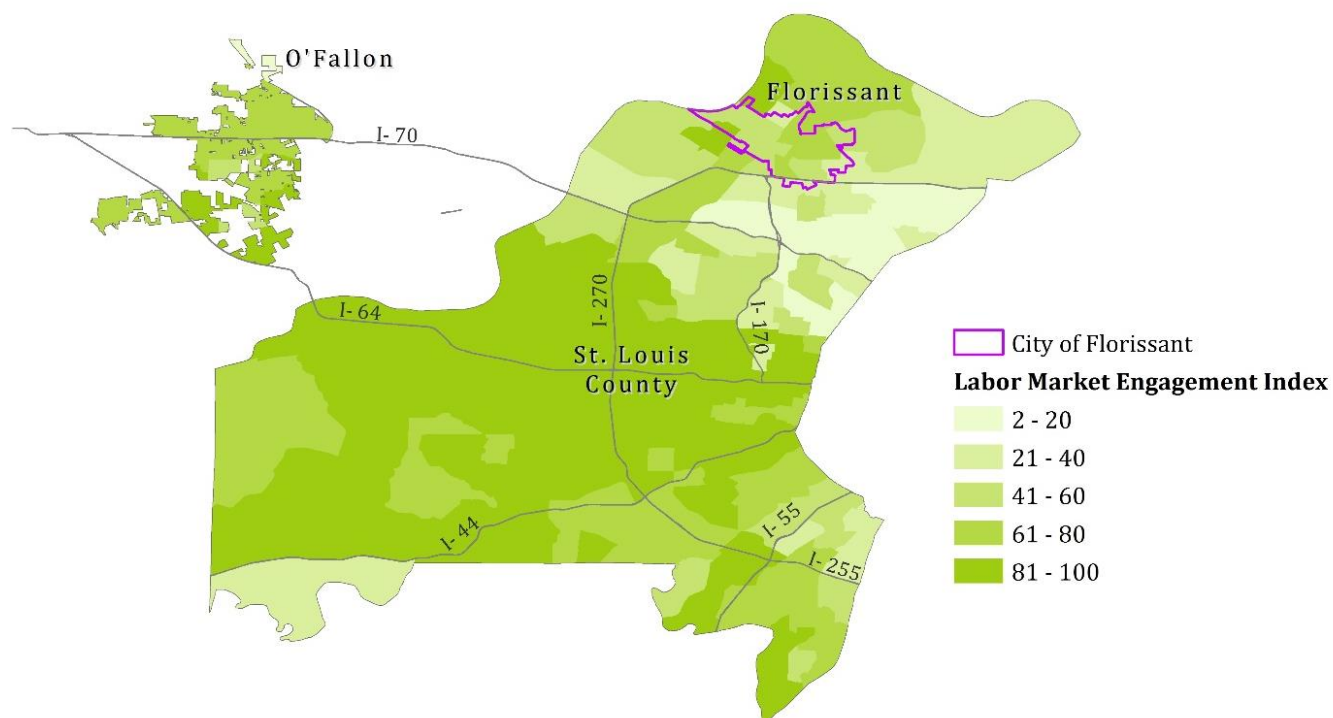
Poverty Index by Block Group in St. Louis County, Florissant, and O'Fallon



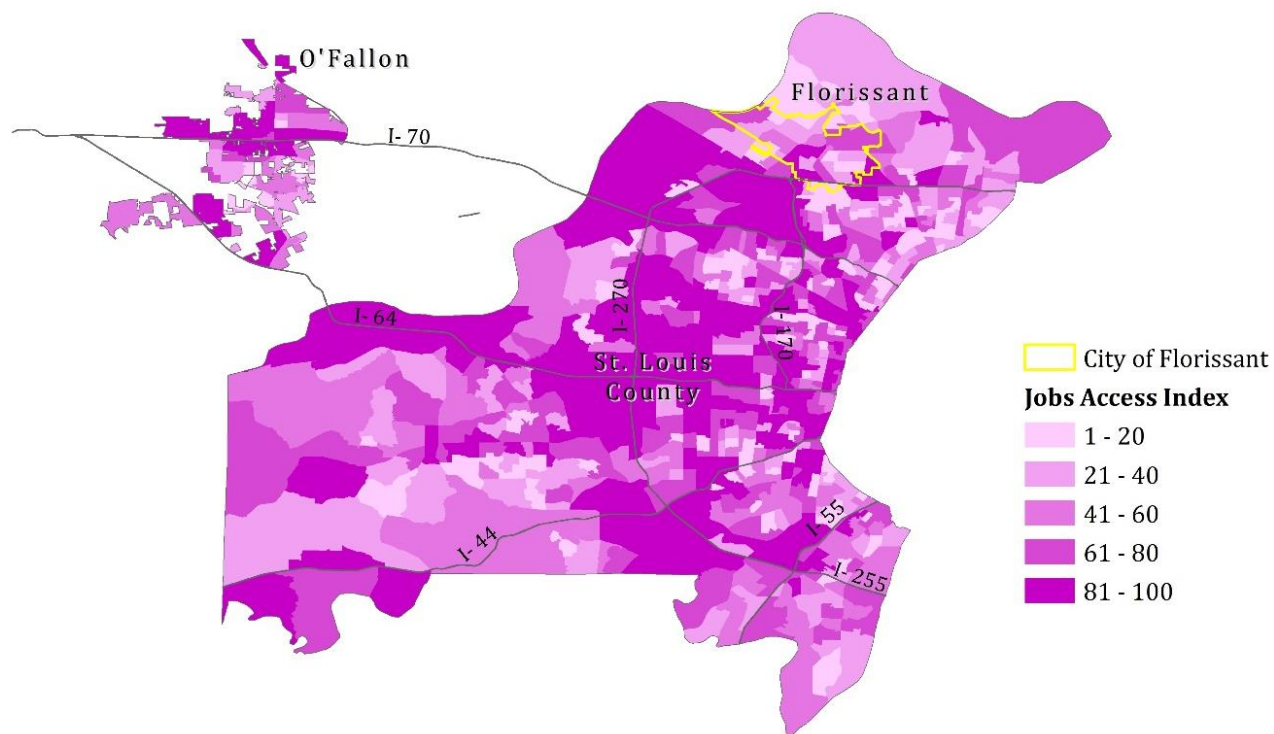
School Proficiency Index by Block Group in St. Louis County, Florissant, and O'Fallon



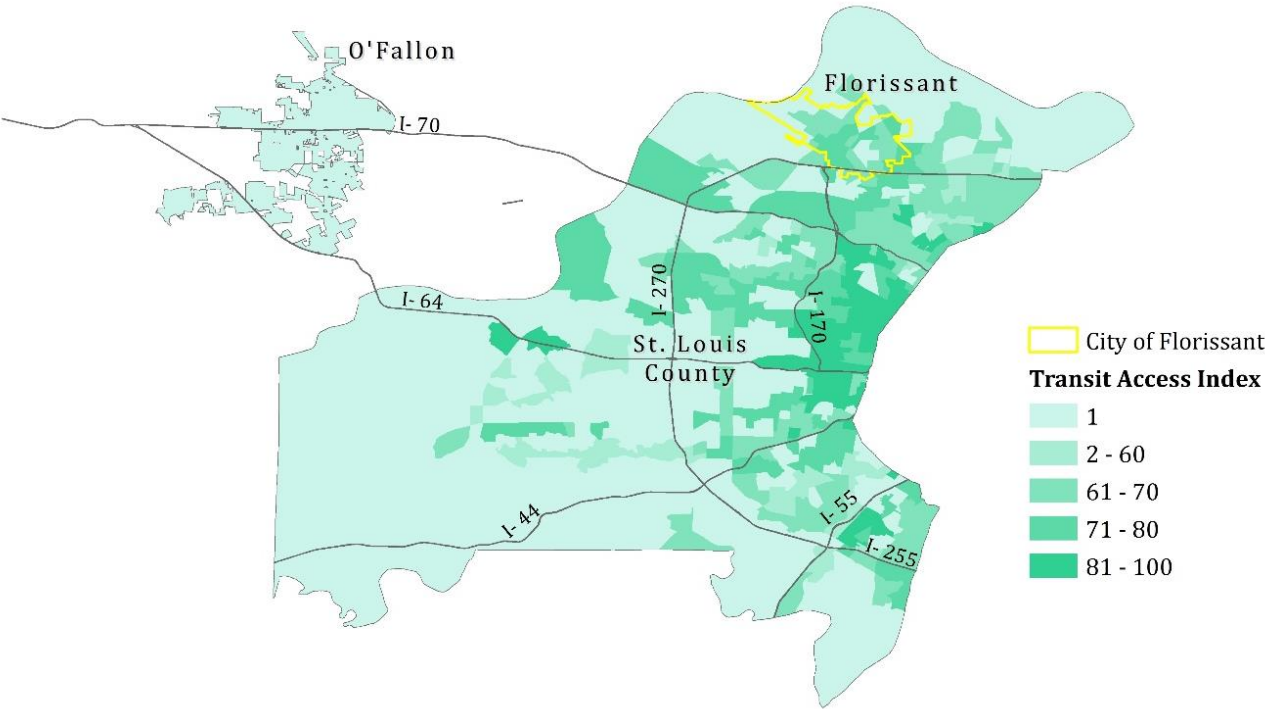
Labor Market Engagement Index by Block Group in St. Louis County, Florissant, and O'Fallon



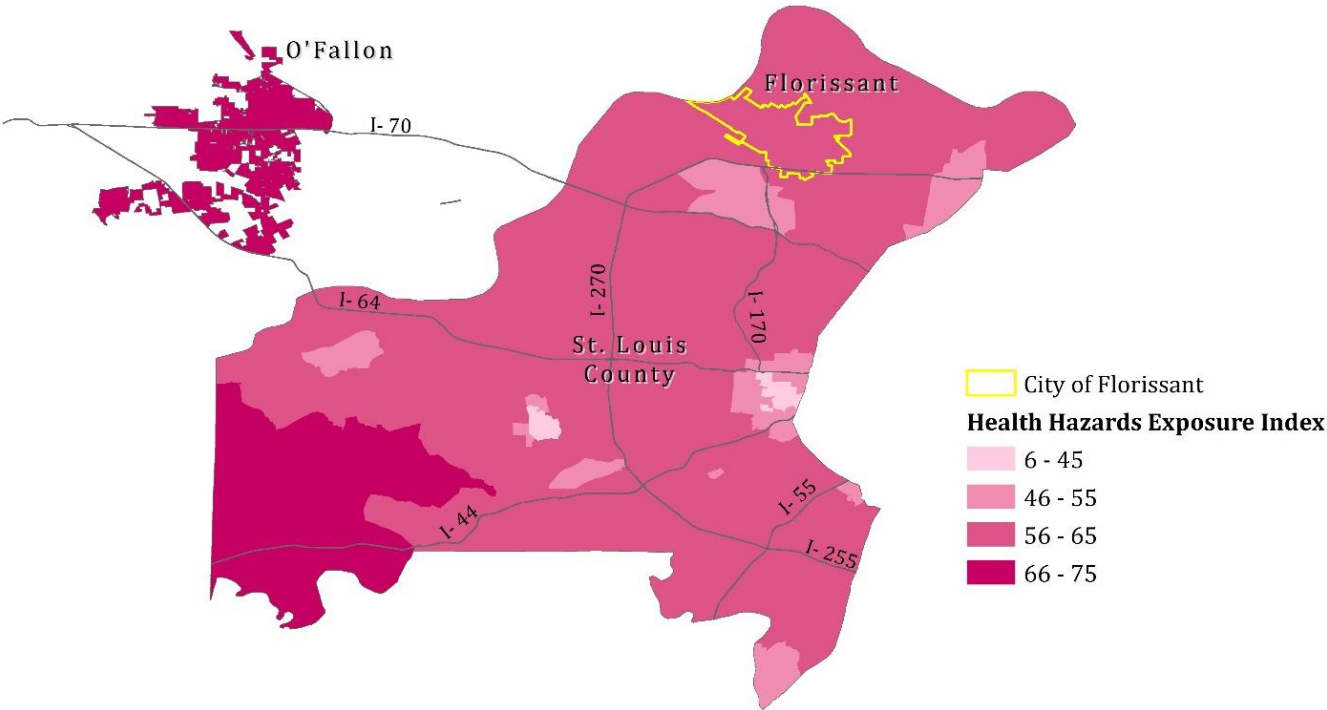
Jobs Access Index by Block Group, St. Louis County, Florissant, and O'Fallon



Transit Access Index by Block Group in St. Louis County, Florissant, and O'Fallon



Health Hazards Exposure Index by Block Group in St. Louis County, Florissant, and O'Fallon



HUD also developed a methodology for comparing relative exposure to neighborhood opportunity dimensions for different population subgroups (e.g., racial and ethnic groups). An average index score for each subgroup is found by averaging the block group scores weighted by the subgroup population. Comparing these average scores reveals any potential disparities in access to opportunity based on residential patterns of subgroups. In other words, the analysis assesses whether some subgroups tend to live in higher opportunity areas than others.

The tables that follow compare average opportunity scores for several racial and ethnic groups in St. Louis County and O'Fallon. Indices for each minority group are compared to those for Whites to arrive at an estimate of disparity.⁹⁸ Positive disparity numbers indicate that Whites, on average, reside in more favorable neighborhood conditions (higher values for the opportunity dimensions) than the minority group being compared. Negative values indicate that the minority group tends to live in neighborhoods with more favorable conditions than their White counterparts.

The first comparison is between St. Louis County's general population and that portion of the population in poverty. For poor persons, poverty, school proficiency, and labor market engagement index values are uniformly lower than for the general population, meaning people in poverty tend to reside in communities with less opportunity, when measured by these dimensions. Disparities between job access and exposure to health hazards do not substantially vary between the general population and the subpopulation of people in poverty. But, transit access improved for those in poverty, indicating that the poorer subpopulation is more likely to live in communities with access to transit.

Disparities between index values for Whites and each minority group are also measured by poverty status. Comparing opportunity index values between White and Black residents reveals significant disparities for poverty, school proficiency, and labor market engagement, regardless of poverty status. Disparities for these indices range from 32 to 47 points. Jobs access and exposure to health hazards index scores show less pronounced disparities between Black and White residents (under 10 points); Black residents tend to live in areas with better transit access than do Whites.

Hispanic residents of St. Louis County tend to live in lower opportunity neighborhoods when compared to White residents, regardless of poverty status, for poverty, school proficiency, and labor market engagement. Opportunity gaps between the two groups range from 9 to 14 points for these dimensions. Hispanic residents' jobs access and exposure to health hazards are roughly equivalent to those of White residents, while their access to transit is better (by 10 points for the general population and 4 for persons in poverty).

For most opportunity dimensions, Asians in the general population and in poverty had higher index values than their White counterparts.

⁹⁸ The analysis of access to opportunities includes data for Hispanics, Non-Hispanic Whites, Non-Hispanic Blacks, and Non-Hispanic Asians. As in the segregation analysis, these groups are referred to as "Hispanics," "Whites," "Blacks," and "Asians" for simplicity.

In O'Fallon, opportunity index values for the general population and the population in poverty are higher than in St. Louis County for all dimensions, with the exception of job access for the general population and transit access for both populations. Unlike St. Louis County, there are not large disparities in access to opportunity between different racial and ethnic groups in O'Fallon. Black and Hispanic residents have opportunity scores quite similar to Whites, while Asians and poor minority residents tend to have better access to opportunity than their White counterparts. These findings reflect the fact that minority residents in O'Fallon have similar geographic distributions as White residents (shown through the low Dissimilarity Indices). Thus, they live in similar neighborhoods as White residents and have similar access to opportunity.

Summary

The analysis of access to neighborhood opportunities shows that in St. Louis County, poverty, school proficiency, labor market engagement, and transit access are the four areas where level of opportunity is most related to race, ethnicity, and poverty status. The former three tend to be worse for minorities and those in poverty, while transit access is uniformly better for minority residents and persons in poverty. Jobs access and exposure to health hazards are relatively similar regardless of these factors.

In O'Fallon, there is little disparity between Black, Hispanic, and White residents for any of the opportunity dimensions. Asians tend to have slightly higher access to opportunity, as do poor minority subgroups in comparison to poor Whites.

Disparity in Access to Neighborhood Opportunity - All Persons in St. Louis County								
All Persons						Disparity		
Opportunity Dimension	All Persons	White Persons	Black Persons	Hispanic or Latino Persons	Asian Persons	White - Black	White-Hispanic	White-Asian
Poverty	63	71	37	61	75	34	10	-4
School Proficiency	62	74	27	62	79	47	12	-5
Labor Market Engagement	66	75	38	66	81	37	9	-6
Job Access	53	55	46	57	62	9	-2	-7
Transit Access	41	36	57	46	40	-21	-10	-4
Health Hazards Exposure	60	61	59	60	61	2	1	0
Counts	998,954	687,984	231,801	25,024	34,466			
Persons in Poverty						Disparity		
Opportunity Dimension	All Poor Persons	Poor White Persons	Poor Black Persons	Poor Hispanic or Latino Persons	Poor Asian Persons	Poor White-Black	Poor White - Hispanic	Poor White - Asian
Poverty	41	58	26	44	55	32	14	3
School Proficiency	41	60	23	47	67	37	13	-7
Labor Market Engagement	46	63	30	51	71	33	12	-8
Job Access	51	54	47	58	59	7	-4	-5
Transit Access	54	48	60	50	49	-12	-2	-1
Health Hazards Exposure	59	60	58	60	59	2	0	1
Counts	93,673	37,652	46,706	3,447	3,332			

Source: U.S. HUD Office of Policy Development & Research, Regional Planning Grant Program Raw Block Group Data, Retrieved from <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Disparity in Access to Neighborhood Opportunity - All Persons in O'Fallon								
All Persons						Disparity		
Opportunity Dimension	All Persons	White Persons	Black Persons	Hispanic or Latino Persons	Asian Persons	White - Black	White-Hispanic	White-Asian
Poverty	74	74	74	71	77	0	3	-3
School Proficiency	67	67	67	66	72	0	1	-5
Labor Market Engagement	74	74	75	72	79	-1	2	-5
Job Access	51	51	53	53	55	-2	-2	-4
Transit Access	1	1	1	1	1	0	0	0
Health Hazards Exposure	71	71	71	71	70	0	0	1
Counts	125,123	112,371	4,631	3,299	3,345			
Persons in Poverty						Disparity		
Opportunity Dimension	All Poor Persons	Poor White Persons	Poor Black Persons	Poor Hispanic or Latino Persons	Poor Asian Persons	Poor White-Black	Poor White - Hispanic	Poor White - Asian
Poverty	65	64	68	66	72	-4	-2	-8
School Proficiency	66	66	68	65	67	-2	1	-1
Labor Market Engagement	68	66	77	65	80	-11	1	-14
Job Access	59	58	62	64	70	-4	-6	-12
Transit Access	1	1	1	1	1	0	0	0
Health Hazards Exposure	71	71	70	72	71	1	-1	0
Counts	4,641	3,724	383	254	233			

Note: Total population counts for this analysis do not match population totals for the City of O'Fallon because this analysis uses tract level rather than place level data, and includes all tracts with a portion of their population in O'Fallon.

Source: U.S. HUD Office of Policy Development & Research, Regional Planning Grant Program Raw Block Group Data, Retrieved from <http://www.huduser.org/portal/Sustainability/grantees/data.html>

Land Use & Zoning

Comprehensive land use 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 not only influence the value and use of surrounding property, but is necessarily a traffic and environmental decision as well (such an intensive commercial use will increase traffic flow and large impervious parking lots will increase stormwater 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.”⁹⁹ By extension, decisions regarding land use and zoning have direct and profound impacts on affordable housing and fair housing choice, as will be discussed within this section.

From a regulatory standpoint, local government measures to control land use typically rely upon zoning codes, subdivision codes, and housing and building codes in conjunction with comprehensive plans. Courts have long recognized the power of local governments to control land use, and Missouri authorizes local municipalities, townships, and counties to regulate land use and zoning within their respective jurisdictions through the Zoning Enabling Act and other state statutes. (Mo. Rev. Statutes § 89.020 – 89.491; 64.010 – 64.975.) Local governments may divide their jurisdiction into zoning districts, define categories of permitted and special approval uses for those districts, and establish design or performance standards for those uses. Jurisdictions also may expressly prohibit certain types of uses within zoning districts. In that way, local ordinances often define the type and density of housing resources available to residents, developers and other organizations within certain areas.

While zoning codes have an important role to play in regulating the health and safety of the structural environment, overly restrictive codes can negatively impact fair housing choice within a jurisdiction. Examples of zoning provisions that most commonly result in barriers to fair housing choice include the following:

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

⁹⁹ John M. Levy. *Contemporary Urban Planning, Eighth Edition*. Upper Saddle River, NJ: Pearson Prentice Hall, 2009.

- Restrictions making it difficult for residents with disabilities to locate housing in certain neighborhoods or to modify their housing.
- Restrictions on occupancy of accessory housing structures such as carriage homes or basement units.

While local governments have the power to enact zoning and land use regulations, that power is limited by federal and state fair housing laws (e.g., Missouri Human Rights Act, Fair Housing Amendments Act, Americans With Disabilities Act, constitutional due process and equal protection). And even where a specific zoning decision does not violate the letter of the law, HUD entitlement communities have made a commitment to do more than the minimum standards required to not infringe on the property and fair housing rights of their residents, but also to establish policies and plans that protect and advance fair housing choice.

Because zoning codes present a crucial area of analysis for a study of impediments to fair housing choice, a detailed review of the code provisions is typically performed. However, because St. Louis County contains more than 90 individual municipalities, each with its own unique zoning code, a comprehensive review of all the codes was not feasible and a sample set of local codes was reviewed instead. The sample set includes the codes of each of the three entitlement communities contributing to this study (St. Louis County, Florissant, and O'Fallon) and five other St. Louis County municipalities selected by the St. Louis County Office of Community Development and representing a variety of community types and geographic diversity. The sample of eight local zoning codes within the study area was reviewed and evaluated against a list of 18 common fair housing issues. Each of the eight ordinances were assigned a risk score of either 1, 2, or 3 for each issue and were then given an aggregate score calculated by averaging the individual scores, with the possible scores defined as follows:

- 1 = low risk – the provision poses little risk for discrimination or limitation of fair housing choice;
- 2 = medium risk – the provision is neither among the most permissive nor most restrictive; while it could complicate fair housing choice, its effect is not likely to be widespread;
- 3 = high risk – the provision causes or has potential to result in systematic and widespread housing discrimination or the limitation of fair housing choice.

The matrix is designed as a tool for analyzing whether, in what areas, and to what degree a municipality's zoning and land use regulations restrict fair housing choice. It is not meant to simply show whether a municipality's code creates a per se violation of the FHA or other fair housing laws. Restricting housing choice for certain historically/socio-economically disadvantaged groups and protected classes can happen as a matter of degree and on a continuum. This section of the report may point out areas where there is a clear violation of current housing law or HUD standards, but the goal also is to answer whether a municipality's regulations may violate the spirit of fair housing protections and HUD's goals and standards for its entitlement communities. The narrative that

follows highlights areas where the sample municipalities may not necessarily be in legal jeopardy but could make improvements toward the goal of affirmatively furthering fair housing choice.

The 18 individual risk scores were averaged for each studied municipality, yielding a composite score indicative of the probability of the municipality's zoning ordinance, in general, limiting fair housing choice. The complete reports, including citations to relevant code sections and explanatory comments, for the individual municipalities are included as an appendix to this document, however, the composite scores lend themselves to comparative analysis here.

The overall risk scores ranged from a low of 1.44 to a high of 1.83, with the average of the composite risk scores being 1.63. Of the eight zoning ordinances reviewed, University City and Chesterfield were the most permissive and the least likely to result in housing discrimination or the limitation of fair housing choice (except when analyzed according to a specific zoning issue such as the definition of family). Sunset Hills was assigned an average risk score of 1.83, indicating that its zoning ordinance had the greatest potential to result in housing discrimination of the municipalities reviewed. St. Louis County, O'Fallon, and Florissant each scored 1.61, indicating a moderate risk of its zoning and land use regulations contributing to discriminatory housing treatment or impeding fair housing choice in certain areas.

Zoning Matrix Analysis Composite Scores by Municipality	
Municipality	Score
St. Louis County	1.61
O'Fallon	1.61
Florissant	1.61
University City	1.44
Chesterfield	1.44
Maryland Heights	1.67
Webster Groves	1.78
Sunset Hills	1.83

Another dimension for analysis involves averaging the risk scores for all municipalities studied for each of the 18 fair housing issues evaluated in the zoning analysis. Using this approach highlights specific fair housing issues and the degree to which their application may be problematic or restrictive throughout the study area in general.

Zoning Code Risk Scores	
ISSUE	Average RISK SCORE
1. Does the jurisdiction's definition of "family" have the effect of preventing unrelated individuals from sharing the same residence? Is the definition unreasonably restrictive?	2.25
2. Does the definition of family discriminate against unrelated individuals with disabilities (or members of any other protected class) who reside together in a congregate or group living arrangement?	1.13
3a. Does the zoning ordinance require a use permit to locate housing for individuals with disabilities in certain residential districts? 3b. Is housing for individuals with disabilities allowed as of right only in a few residential zones?	1.50
4. Does the zoning ordinance unreasonably restrict housing opportunities for individuals with disabilities who require onsite supportive services?	1.38
5. Does the jurisdiction's policies, regulations, and/or zoning ordinance allow persons with disabilities to make reasonable modifications or provide reasonable accommodation to specific zoning or regulatory requirements?	2
6a. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for applicants with disabilities? 6b. Is the hearing only for applicants with disabilities rather than for all applicants?	2
7. Does the ordinance impose spacing or dispersion requirements on certain housing types, creating a disparate impact on certain populations?	1.50
8a. Are there any restrictions for Senior Housing in the zoning ordinance? 8b. If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)?	1.50
9. Does the zoning code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a special or conditional use permit?	1.50
10. Does the jurisdiction restrict any inherently residential uses protected by fair housing laws (such as residential substance abuse treatment facilities) only to non-residential zones?	2.38
11. Does the ordinance include residential zones with high minimum lot sizes, wide street frontages, large setbacks, low FARs, large minimum building square footage, and/or low maximum building heights, effectively preventing affordable or multi-family housing?	1.63
12. Are unreasonable restrictions placed on the construction, rental, or occupancy of accessory structures (i.e. carriage house, guest house, basement unit) within residential districts?	2

Zoning Code Risk Scores (continued)	
ISSUE	Average RISK SCORE
13a. Does the ordinance fail to provide zones where multi-family housing is permitted as of right? 13b. Do multi-family districts restrict development only to low-density housing types?	1.75
14. Does the ordinance unreasonably restrict the siting of mobile, manufactured, and modular homes?	1.88
15a. Is the process by which a use permit (CUP, SUP, SLUP) is obtained unreasonably lengthy, complex and costly, effectively discouraging applicants? 15b. Is there a clear procedure by which denials may be appealed?	1
16. Does the zoning ordinance include an inclusionary zoning provision?	1.88
17. Does the zoning ordinance include a discussion of fair housing?	1
18a. Do the jurisdiction's codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act? 18b. Are the jurisdiction's accessibility standards (as contained in the zoning ordinance or building code) congruent with the requirements of the Fair Housing Act? 18c. Is there any provision for monitoring compliance?	1
Average Aggregate Risk Score	1.63

In most cases, the ordinances reviewed were reasonably permissive and allowed for flexibility as to the most common fair housing issues. Very few of the municipalities reviewed received a “3” (high risk) score on any of the 18 issues evaluated. However, where the average score for an issue is “2” (medium risk) or greater, this indicates that the zoning and land use regulations and policies have the potential to negatively impact fair housing. It also means the jurisdiction could be subject to fair housing complaints and expensive litigation. In such cases, improvements to the rules and policies could be made to more fully protect the fair housing rights of residents of the study area.

Of the 18 issues studied, the sample set of zoning codes generally handled very well the matter of establishing reasonable, uncomplicated processes for obtaining special/conditional use permits and setting forth transparent appeal procedures (Issue 15). All of the municipalities reviewed received a “1” (low risk) on this issue. This is important because zoning codes may unnecessarily complicate these processes with many layers of review and long spans of time between them, effectively discouraging all but the most determined permit seekers from even applying for a permit. An applicant seeking to develop property for a use requiring special permitting would likely select a site elsewhere rather than navigate these types of processes. The finding that the study

area's zoning ordinances generally do not impose such burdens is a feature that advances fair housing choice.

Another low risk score was for Issue 17, whether the municipality has adopted a policy regarding fair housing. All of the municipalities reviewed have adopted a fair housing ordinance, either as part of the zoning ordinance, or under a separate code chapter regarding discrimination, human rights, or human relations within the jurisdiction. Some of the ordinances (Webster Groves, Maryland Heights, Chesterfield), however, do not include a discussion regarding the jurisdiction's own obligations to grant reasonable modifications or accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling. As will be discussed below under Issue 5, a standardized administrative process for seeking a reasonable accommodation is important to fair housing choice for persons with disabilities.

The jurisdictions analyzed also generally scored well regarding allowances for housing for persons with disabilities. Under MO. Rev. Stat. Sec. 89.020(2), "the classification single family dwelling or single family residence shall include any home in which eight or fewer unrelated mentally or physically handicapped persons reside, and may include two additional persons acting as houseparents or guardians." Most of the eight ordinances surveyed follow the state guideline, either by including in the definition of "family" up to eight unrelated persons with disabilities (plus two supporting supervisors), or through the zoning district regulations, or through the definition and regulation of "group homes." Accordingly, most of the jurisdictions were given a low score for Issues 2, 3, and 4. (See, however, the Zoning Analysis Matrix for Chesterfield and for Webster Groves, both of which received higher risk scores on these issues.)

While the foregoing is a picture of the study area's strengths in terms of how its codes protect fair housing choice, the following analysis illustrates concrete actions the municipalities could make in terms of their respective zoning and land use regulations to uphold the commitment to furthering fair housing. The issues highlighted below show where zoning ordinances, city codes, and policies could go further to protect fair housing choice for protected and disadvantaged classes, and still fulfill the zoning objective of protecting the public's health, safety, and general welfare.

Often one of the most scrutinized provisions of a municipality's zoning code is its definition of "family." Ideally, the definition does not unreasonably restrict the number of unrelated individuals permitted to live together as a single housekeeping unit where the definition does not similarly limit the number of related persons who may reside together. In viewing the scores for Issue 1, it is important to remember that there are degrees of reasonableness, especially when comparing one municipality's code to its neighbor or to precedential case law. The study area's average score for Issue 1, was 2.25, with three of the eight jurisdiction receiving a 3 on this issue.

While a jurisdiction's definition of family may pass constitutional muster, (See e.g., Belle Terre v. Boraas, 416 U.S. 1 (1974) (where a zoning ordinance limiting the number of unrelated persons

living together in residential districts to two survived a federal equal protection and First Amendment challenge)), the definition may violate state due process where it restricts the size of a functionally equivalent family of unrelated persons but not the size of a family related by blood or marriage. (See Moore v. East Cleveland, 431 U.S. 494, 511 (1977) (requiring that municipalities not unreasonably restrict the definition of family)). The local municipality could be sued and made to show that such a differentiation reasonably relates to a legitimate zoning purpose. Whether unrelated residents of the same dwelling reside together as a single housekeeping unit or functionally equivalent “family” is a factual question that in many cases must be reviewed on a case by case basis.

In 2006, an unmarried couple, Olivia Shelltrack and Fondray Loving, represented by the ACLU, filed suit against the City of Black Jack after being denied an occupancy permit because the local zoning law’s definition of “family” prohibited more than three unrelated people from living together unless related by “blood, marriage or adoption.” At the time, the couple had been together for 13 years and had two children together. However, because Loving was not the biological father of Shelltrack’s oldest child, the city denied the family an occupancy permit for the 2,300 sq. ft. home that they had recently purchased. The lawsuit alleged violations of substantive due process and equal protection under the Missouri and federal Constitutions, and discrimination on the basis of familial status in violation of the Fair Housing Act. In response, the City of Black Jack adopted a new ordinance redefining what constitutes a “family” for zoning and occupancy purposes to include unmarried couples and their children. The city then settled with the plaintiffs before the fair housing issues could be adjudicated by the court. This local case highlights the potential legal challenges jurisdictions with restrictive definitions of family may face. See Loving v. City of Black Jack, Civil Action No. 2106CC-03157 (Circuit Court for the County of St. Louis 2006), Civil Action No. 4:06-cv-01430 (E.D. Mo. 2006) (case removed to federal district court and settlement agreement reached).

Another area for improvement would be for the jurisdictions to adopt a reasonable accommodation ordinance for making requests for reasonable accommodation/modification in land use, zoning and building regulations, policies, practices and procedures (Issues #5 & 6). Federal and state fair housing laws require that municipalities provide individuals with disabilities or developers of housing for people with disabilities flexibility in the application of land use and zoning and building regulations, practices and procedures or even waiving certain requirements, when it is necessary to eliminate barriers to housing opportunities. All of the surveyed jurisdictions received a medium risk score “2” for this issue because they failed to provide a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Often cities and counties handle the mandate to provide a reasonable accommodation through their variance or conditional use permit procedures. However, the purpose of a variance is not congruent with the purpose of requesting a reasonable accommodation. To obtain a variance, an applicant must show special circumstances or conditions applying to the land, building, or use that are preexisting and not owing to the applicant. In contrast, a reasonable accommodation is to allow individuals with disabilities to have equal access to use and enjoy

housing. The jurisdiction does not comply with its duty to provide reasonable accommodation if it applies a standard based on the physical characteristics of the property rather than considering the need for modification based on the disabilities of the residents of the housing. Whereas simple administrative procedures may be adequate for the granting of exceptions, the variance and conditional use permit procedures subject the applicant to the public hearing process where there is the potential that community opposition based on stereotypical assumptions about people with disabilities may impact the outcome. Adopting a reasonable accommodation ordinance is one specific way to address barriers in land use and zoning procedures and would help municipalities more fully comply with the intent and purpose of fair housing laws.

Model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. For example, in the St. Peters, Missouri case discussed below, in compliance with a settlement agreement, the city adopted a “Reasonable Accommodation Policy and Procedure” ordinance, which includes a standardized process and gives the director of planning, or his designee, the authority to grant or deny reasonable accommodation requests without the applicant having to submit to the variance or conditional use permit or other public hearing process.

There also is potential risk of fair housing discrimination under Issue #7. Half of the jurisdictions surveyed in the study area impose a minimum spacing or separation requirement on group homes for persons with disabilities. Spacing requirements are generally inconsistent with the FHA, unless the jurisdiction could make a showing that (1) the ordinance was passed to protect a compelling governmental interest (e.g. over-concentration of group homes could adversely affect individuals with disabilities and would be inconsistent with the goal of integrating persons with disabilities into the wider community) and that (2) the spacing requirement is the least restrictive means of protecting that interest. Where this issue has been litigated under fair housing laws, courts have often invalidated such spacing requirements as discriminatory. (See, e.g., Horizon House Developmental Serv., Inc. v. Township of Upper Southampton, 804 F.Supp. 683, 693 (E.D.Pa. 1992) (invalidating 1,000 feet separation requirement), *aff’d* without opinion, 995 F.2d 217 (3rd Cir. 1993). Research did not indicate that a similar spacing requirement has been decided in Missouri or the 8th Circuit that would provide precedent for the lawfulness of the spacing ordinances found in the sample of zoning codes reviewed. However, at least one lawsuit has been brought recently in the Eastern District of Missouri to challenge a similar spacing requirement.

On August 1, 2013, the U.S. Justice Department filed suit against the City of St. Peters in St. Charles County, Missouri, to challenge a zoning ordinance that imposed a 2,500 feet spacing requirement on group homes for persons with disabilities in residential districts. United States v. City of St. Peters, Civil Action No. 4:13-cv-01493-CEJ (E.D. Mo. 2013). The city imposed the 2,500 foot spacing requirements on housing for people with disabilities and not on housing for people without disabilities, making the provision facially discriminatory. After the city denied, without justification, a variance request by Community Living, Inc. to operate a group home for four women with

intellectual disabilities, a legal guardian for a resident of the group home filed a complaint with HUD which led to the suit in federal court. The city agreed to a settlement approved by the DOJ, which included amending the spacing requirement. The city's zoning regulations regarding group homes still include a spacing requirement, but reduced to 500 feet, and now expressly state that the intent of the spacing requirement is "to promote deinstitutionalization and dispersal of group homes."

Due to settlement, the court never had the opportunity to adjudicate the merits of the government's claims against St. Peters' spacing requirement. However, similar regulations can be found in local zoning ordinances within the study area, and may expose these municipalities to costly litigation where residents are denied housing choice because of their disability.

The sample set of zoning ordinances also received a "2" (medium risk) score for Issue #10 for restricting certain types of inherently residential uses (specifically residential treatment facilities) only to non-residential zones. Persons recovering from drug and/or alcohol dependence (not current users) are considered handicapped under federal law, and therefore are part of a protected class. Under federal law (e.g. FHA, ADA, Rehabilitation Act), it is discriminatory to deny an individual or entity the right to site a treatment program in a residential zone because it will serve individuals with alcohol or other drug problems. Most of the surveyed ordinances expressly differentiate residential substance abuse treatment facilities from other housing types for persons with disabilities.

In City of St. Joseph v. Preferred Family Healthcare, 859 S.W.2d 723 (Mo. Ct. App. 1993), a corporation owned a group home and sought to use the home for eight residents recovering from drug abuse. The corporation sought a building permit that was denied. The city filed an action for declaratory judgment and permanent injunction. The trial court ruled in favor of the city, enjoining the corporation from putting more than five unrelated persons in the home, as it was located in a single-family zoning district. The corporation appealed and the Missouri Court of Appeals affirmed the trial court's decision. The Court of Appeals found that group homes for individuals recovering from drug abuse were not allowed in all single-family zoning districts by virtue of Mo. Ann. Stat. § 89.020.2 (Supp. 1992) because § 89.020.2 was unambiguous in that it addressed homes where handicapped persons resided, but not persons suffering from alcohol or drug abuse because they are not specifically named in the statute as "mentally or physically handicapped persons." The court also held that preventing group homes of more than five recovering drug abusers and alcoholics did not violate the Fair Housing Act.

However, in a subsequent case brought in federal court, the district court for the Eastern District of Missouri acknowledged the contrary authority set by City of St. Joseph v. Preferred Family Healthcare, but disagreed with the Missouri Court of Appeals conclusions. See Oxford House-C v. City of St. Louis, 843 F. Supp. 1556, 1580 (E.D. Mo. 1994) (reversed in part, vacated in part, and remanded by Oxford House-C v. City of St. Louis, 77 F.3d 249, 253 (8th Cir. Mo. 1996). In Oxford House, the federal court found that persons recovering from substance abuse are considered handicapped/disabled under federal fair housing law, and therapeutic housing should be permitted

generally in residential districts. However, in this case the court concluded that the city did not interfere with the residents' equal housing rights by enforcing the eight-person rule against them.

The study area also could further bolster how it affirmatively furthers fair housing by adopting inclusionary zoning provisions that provide incentives for the development of affordable housing, such as higher density allowances and a waiver or modification of other development standards (Issue 16). Municipalities could also allow greater flexibility in the types of low-impact affordable housing permitted, such as accessory dwelling units in single family districts and mobile/manufactured homes. (Issues 12 and 14). The use of accessory structures as dwellings provides private market opportunities to incorporate smaller, more affordable housing units into neighborhoods of opportunity that otherwise would be expensive places to live.

It must be noted that the foregoing analysis of eight of the study area's zoning regulations is highly generalized. Therefore, it is important to view the analysis presented here as an overall sense of the zoning ordinances for the region as a whole but not to assume the average scores correctly characterize each individual jurisdiction or other jurisdictions not specifically studied. Similarly, where average scores are derived for individual municipalities, it should be noted that even those jurisdictions with the highest average risk scores may have scored lower than some of their neighbors on individual issues. As stated above, detailed reports on the zoning provisions and risk scores for each of the eight surveyed municipalities are included in the Appendix.

Housing Profile

The housing profile presents a snapshot of current housing conditions within the study area and includes components such as age of the housing stock, home values, foreclosure rates, housing problems, and housing cost burdens. This housing profile provides an important backdrop to other components of the Analysis of Impediments illuminating them and offering context.

Characteristics of the Housing Stock

According to the 2008-2012 ACS estimates, the study area consisting of St. Louis County (including Florissant) and the City of O'Fallon contained a total of 467,064 housing units, of which 437,803 (93.7%) were located in St. Louis County, 23,793 (5.1%) were located in the City of Florissant and 29,261 or (6.3%) were in the City of O'Fallon. It should be noted here that Florissant is a city within St. Louis County and therefore, Florissant's housing units are counted in this analysis among the County's, but are also broken out separately for the city itself to provide Florissant more targeted data for fair housing planning. Because Florissant is a subset of St. Louis County, adding the two together results in double-counting.

Housing Unit Overview by County and Municipality						
Subject	St. Louis County		Florissant		O'Fallon	
	Count	%	Count	%	Count	%
Number of Units	437,803	--	23,793	--	29,261	--
1-Unit, Detached	316,714	72.3%	18,764	78.9%	22,077	75.4%
1-Unit, Attached	19,889	4.5%	666	2.8%	1,794	6.1%
2 Units	6,982	1.6%	146	0.6%	295	1.0%
3 or 4 Units	20,913	4.8%	838	3.5%	751	2.6%
5 to 9 Units	24,786	5.7%	1,128	4.7%	789	2.7%
10 to 19 Units	23,752	5.4%	1,357	5.7%	1,035	3.5%
20 or More Units	23,346	5.3%	832	3.5%	1,371	4.7%
Mobile Home	1,335	0.3%	62	0.3%	1,137	3.9%
Boat, RV, Van, etc.	86	0.0%	0	0.0%	12	0.0%
Owner-Occupied Units	288,602	71.4%	16,072	74.0%	23,133	82.9%
% Vacant Owner Units	--	2.2%	--	1.6%	--	2.1%
Renter-Occupied Units	115,549	28.6%	5,649	26.0%	4,773	17.1%
% Vacant Renter Units	--	6.7%	--	10.8%	--	9.0%

Source: 2008-2012 American Community Survey Table DP04

Single-family detached units represented by far the most common type of housing in each of the three jurisdictions: 72.3% of the units in the County, 78.9% of the units on Florissant, and 75.4% in O'Fallon. Multi-family housing consisting of five or more units represented 16.4% of the County's housing stock, 13.9% of Florissant's and 10.1% of O'Fallon's. Mobile homes were significantly more common in O'Fallon (3.9% of the housing stock) than in St. Louis County or Florissant (0.3% of the housing stock in both jurisdictions). Homeownership rates ranged from 71.4% in St. Louis County to 82.9% in O'Fallon and in all jurisdictions, the vacancy rate was substantially lower for ownership units than for rental units. Compared with the other two jurisdictions, Florissant displayed both the lowest vacancy rate for ownership units and the highest vacancy rate for rental units. This phenomenon could indicate an imbalance in the supply of or demand for these types of units; homebuyers would find very little inventory available for sale yet renters could potentially have available to them more than one in 10 rental units in the city.

The table below provides tenure rates by race and ethnicity for each jurisdiction. In each area, White householders have higher homeownership rates than minority householders, ranging from 79.2% in St. Louis County to 84.2% in O'Fallon. In comparison, Black homeownership rates range from 49.0% in Florissant to 68.6% in O'Fallon, and Hispanic homeownership rates from 52.4% in St. Louis County to 71.0% in O'Fallon.

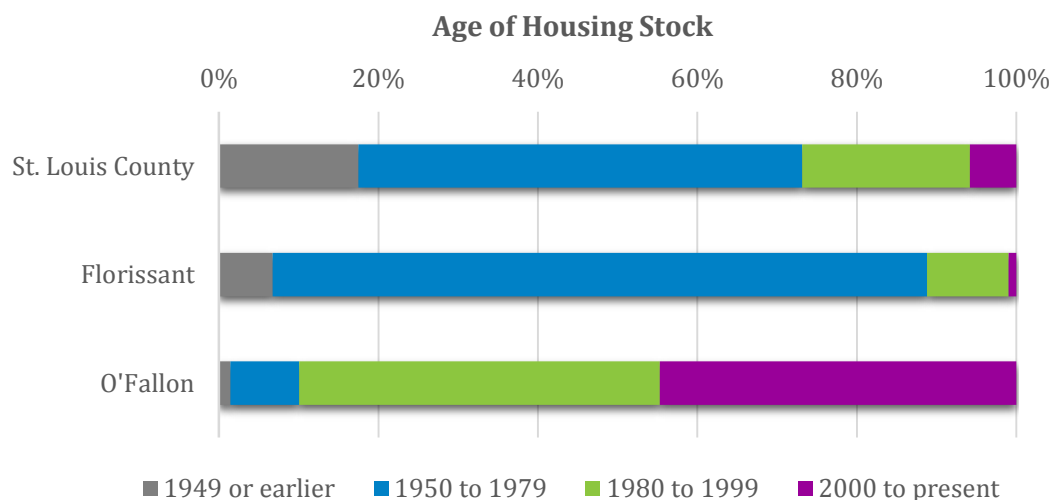
Tenure Rates by Householder Race and Ethnicity, 2010					
Jurisdiction	Non-Hispanic				Hispanic
	White	Black	Asian	Other*	
St. Louis County					
Total Units	294,482	86,988	11,457	4,814	7,024
Owner-Occupied Units	79.2%	52.2%	60.7%	55.1%	52.4%
Renter-Occupied Units	20.8%	47.8%	39.3%	44.9%	47.6%
City of Florissant					
Total Units	15,517	5,041	118	282	289
Owner-Occupied Units	83.9%	49.0%	78.8%	60.6%	69.6%
Renter-Occupied Units	16.1%	51.0%	21.2%	39.4%	30.4%
City of O'Fallon					
Total Units	25,567	1,078	757	305	527
Owner-Occupied Units	84.2%	68.6%	64.5%	77.0%	71.0%
Renter-Occupied Units	15.8%	31.4%	35.5%	23.0%	29.0%

*Includes American Indians, Alaska Natives, Pacific Islanders, Native Hawaiians, and persons of other or multiple races.

Source: 2010 U.S. Census, Table HTC1

These rates indicate that minority households are less likely to have the opportunity to build wealth through homeownership, and more likely to be impacted by restrictions on multifamily housing and/or rental units. The discussion of Home Mortgage Disclosure Act (HMDA) data further reveals that Black residents of St. Louis and St. Charles County are less likely to apply for home purchase loans and less likely to have their applications approved than are their White counterparts.

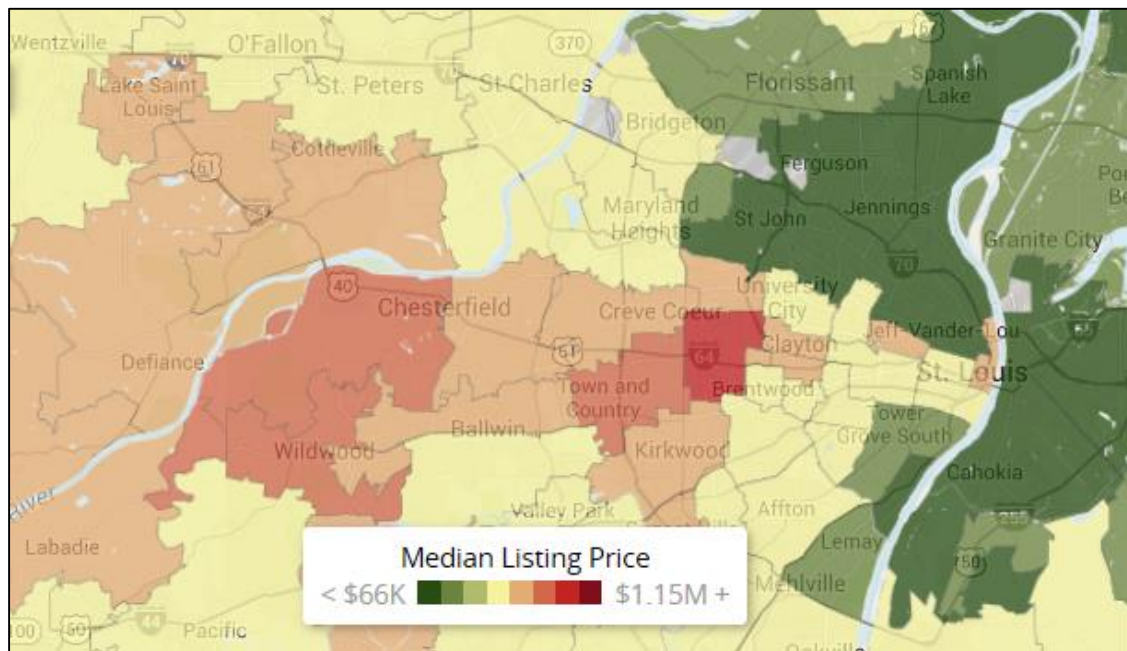
The age of an area's housing stock typically has a substantial impact on the overall housing conditions, the likelihood that the housing is accessible to people with disabilities, and, by extension, the housing choices available. As housing ages, maintenance costs rise which can present significant housing affordability issues for low- and moderate-income homeowners. Overall, 69.2% of the study area's housing units were built before 1980 and 30.8% of the housing stock was constructed in 1980 or later. However, the age of the housing stock varies greatly between jurisdictions. As reflected in the chart below, St. Louis County and Florissant largely mirror one another with the vast majority of their housing stock constructed between 1950 and 1979. On the other hand, 90% of the housing units in O'Fallon have been constructed since 1979, reflecting the more recent growth of this suburban area.



Source: 2008-2012 American Community Survey Table DP04

Home values, as reported in the 2008-2012 ACS estimates, reflect significant variance across the study area. The highest median home value was found in O'Fallon (\$199,300) followed by St. Louis County (\$177,400) and Florissant (\$111,100). Because home value data in the American Community Survey is self-reported by respondents, it is not always the most reliable source for this information. As a secondary source, the below map from Trulia.com displays median listing prices for the study area for the week ending May 21, 2014. The mapped data indicates median list prices in St. Louis County ranging from under \$30,000 in the Pagedale area to nearly \$800,000 in Ladue. The median list price in Florissant was \$83,125 and \$179,900 in O'Fallon. There are limitations to this data as well: listing prices are not as useful as actual sales prices and the single-week window

can cause one new listing to skew the results for the entire zip code if the list price is especially high or low.



Source: Trulia.com Real Estate Overview, http://www.trulia.com/real_estate/Clayton-Missouri/

Though neither the ACS nor the Trulia data are definitive in and of themselves, combined they illustrate a general pattern of extremes within St. Louis County (generally low home values in North County, generally high values in Central and West County). Florissant's average home values tend to be lower than those of the County at large, but somewhat higher than the home values of many immediate North County neighbors. Home values in O'Fallon tended toward the middle of the range for the study area. Though the median in O'Fallon was greater than that of the St. Louis County, O'Fallon also has fewer very high and very low values. This is consistent with O'Fallon's character as a relatively newer suburban community.

Housing Problems

An examination of certain housing problems, such as foreclosure, substandard conditions, overcrowding, and cost burden can be useful in determining the need for various types of housing assistance.

Data on substandard housing units with incomplete plumbing or kitchen facilities, overcrowding, and cost burden is available from HUD's Comprehensive Housing Affordability Strategy (CHAS) data. The CHAS dataset is a custom tabulation of American Community Survey data provided to HUD for housing and community development planning. The CHAS data discussed below is based on 2007-2011 ACS data and is the most recent CHAS dataset available for the study area. According to the data documentation, a housing unit is classified as lacking complete plumbing facilities when

any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Similarly, housing units lacking a sink with running water, a range, or a refrigerator are described as having incomplete kitchen facilities. Overcrowding occurs when a housing unit has more than one but less than 1.5 people per room; severe overcrowding is defined as 1.5 or more people per room.

Cost burden occurs when a household has gross housing costs that range from 30% to 49.9% of gross household income; *severe* cost burden occurs when gross housing costs represent 50% or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges, but does not include the costs of home maintenance. Given the varied age of housing stock in parts of the study area, the home maintenance and repair costs associated with older construction can add significant housing costs not included in calculations of cost burden.

The CHAS data shows that St. Louis County had a total of 1,293 (0.3%) occupied housing units that lacked complete plumbing facilities and 2,694 (0.7%) housing units lacking complete kitchen facilities. Additionally, 4,217 (1.0%) housing units were overcrowded and 52,975 (13.1%) were categorized as severely overcrowded, as shown in the tables below.

In Florissant, lack of complete plumbing and kitchen facilities was more common than in the County, at 0.7% and 0.9% of total households, respectively. These problems were less prevalent in O'Fallon, where no household lacks complete plumbing and only 0.4% lack complete kitchens. Overcrowding affects a slightly smaller share of households in Florissant (0.8%) and O'Fallon (0.7%) than in St. Louis County (1.0%).

Severe cost burdens affect 21,580 households in Florissant (11.1%) and 2,025 households in O'Fallon (7.5%). Both indicate lower incidences of severe cost burdens than in St. Louis County.

Housing Problems by County and Municipality						
Subject	St. Louis County		Florissant		O'Fallon	
	Count	%	Count	%	Count	%
Total Occupied Units	404,151	--	21,721	--	27,906	--
Substandard Conditions						
Lacking Complete Plumbing Facilities	1,293	0.3%	143	0.7%	0	0.0%
Lacking Complete Kitchen Facilities	2,694	0.7%	192	0.9%	100	0.4%
Overcrowding						
1.00 or Fewer per Room (no overcrowding)	399,934	99.0%	21,544	99.2%	27,714	99.3%
1.01 to 1.50 per Room (overcrowded)	3,235	0.8%	149	0.7%	184	0.7%
1.51 or More per Room (severe overcrowding)	982	0.2%	28	0.1%	8	0.0%

Source: 2008-2012 American Community Survey Table DP04

Cost Burden by County and Municipality						
Cost Burden	St. Louis County		Florissant		O'Fallon	
	Owners	Renters	Owners	Renters	Owners	Renters
Cost Burden <=30%	219,245	60,015	12,140	3,135	17,655	2,545
Cost Burden >30% to <=50%	43,910	24,000	2,365	1,490	3,580	995
Cost Burden >50%	26,885	26,090	1,505	880	1,390	635
Cost Burden not available	1,290	2,735	10	40	20	55
Total	291,325	112,830	16,030	5,550	22,650	4,225

Source: CHAS Data from the 2007-2011 American Community Survey

The *St. Louis HOME Consortium Consolidated Plan 2011-2015* reported housing problems by tenure, household income, and race and ethnicity for the Consortium area based on the 2009 CHAS data. As shown, Black residents were more likely to face a housing problem than non-Hispanic Whites in each category except renters in the 50-80% MFI range. Asian renters were less likely to have a housing problem than White renters at all income levels, while Asian owners were more likely to at income above 30% MFI. For Hispanic households, very low income (below 30% MFI) owners were less likely to face problems than non-Hispanic Whites, while all other tenure and income groups were more likely to have a housing need.

As the preceding tables show, by far the most common housing need in St. Louis County and each of the municipalities is cost burdening. Thus, the higher incidences of housing needs for minority

residents indicate that these households tend to have more difficulty affording homes than Whites living in the Consortium area.

Rate of Housing Problems by Race, Tenure, and Income Level for the HOME Consortium, 2009						
Race/Ethnicity	<30% MFI		30-50% MFI		50-80% MFI	
	Owners	Renters	Owners	Renters	Owners	Renters
Non-Hispanic White	80.7%	75.1%	53.7%	78.0%	38.5%	41.8%
Black	87.6%	84.3%	94.9%	88.2%	58.9%	40.9%
Asian	74.0%	54.7%	83.6%	72.8%	71.0%	35.1%
Hispanic	66.7%	77.5%	64.7%	90.1%	54.0%	59.3%
Total	82.4%	78.9%	57.3%	82.3%	43.9%	41.7%

Note: MFI = Median Family Income

Source: St. Louis HOME Consortium Consolidated Plan 2011-2015, p. 60

Housing Affordability

Because many minorities, people with disabilities, and other protected classes tend to have lower than average incomes, housing affordability becomes an important aspect of fair housing choice. HUD considers housing affordable if it costs less than 30% of a family's income.¹⁰⁰ As discussed in the section above, households that spend over that threshold are considered by HUD to be “cost burdened” and may have difficulty affording the other basic household necessities such as food, clothing, and transportation. Yet, according to HUD, 12 million renters and homeowners in the United States spend *more than 50%* of their income on housing.

CHAS data compares cost burden rates by tenure. In St. Louis County, 44.4% of renters spend more than 30% of their income on rent, compared to 23.4% of owners. Rates of cost burdens among renters were lower in Florissant and O’Fallon than in St. Louis County at 42.7% and 38.6%, respectively. The rate of cost burdened owner households was slightly higher in Florissant (24.1%) but lower in O’Fallon (21.9%) compared to St. Louis County.

Due to generally lower and less stable incomes, cost-burdened renters may be least able to cope with financial setbacks (such as a reduction in hours or a job loss) and therefore are often at risk of homelessness. Faced with such a financial setback, a cost-burdened household often must choose between rent and food or rent and healthcare.

The National Low Income Housing Coalition’s *Out of Reach* 2014 Annual Report calculates the amount of income a household must receive in order to afford a rental unit based on the number of bedrooms in 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. This data is presented in the Renter Affordability Comparison table below. Data is available only down to the county level, so St.

¹⁰⁰ U.S. Department of Housing and Urban Development, www.hud.gov/offices/cpd/affordablehousing/index.cfm

Louis County is included, but Florissant and O'Fallon are not broken out. Florissant is included in the data for St. Louis County and St. Charles County is included in the analysis as it contains O'Fallon. For comparison, data is included for the St. Louis metro area (technically an HMFA) and the State of Missouri as well.

As reported in the 2014 *Out of Reach* study, the National Low Income Housing Coalition (NLIHC) estimated that the median household income for a renter in the study are varied from \$38,449 in St. Charles County to \$31,749 in St. Louis County. The area's Fair Market Rent (FMR) for a two-bedroom apartment was \$814.

Housing Affordability Snapshot						
Subject	St. Louis County		Florissant		O'Fallon	
	Count	%	Count	%	Count	%
Selected Monthly Owner Costs						
Housing units with a mortgage	205,560	--	11,177	--	19,530	--
Less than \$300	283	0.1%	29	0.3%	52	0.3%
\$300 to \$499	2,204	1.1%	271	2.4%	20	0.1%
\$500 to \$699	7,155	3.5%	663	5.9%	326	1.7%
\$700 to \$999	28,601	13.9%	2,694	24.1%	1,695	8.7%
\$1,000 to \$1,499	69,065	33.6%	5,429	48.6%	6,286	32.2%
\$1,500 to \$1,999	44,704	21.7%	1,637	14.6%	6,433	32.9%
\$2,000 or more	53,548	26.0%	454	4.1%	4,718	24.2%
Median (dollars)	1,466	--	1,142	--	1,596	--
Housing units without a mortgage	83,042	--	4,895	--	3,603	--
Less than \$100	163	0.2%	0	0.0%	18	0.5%
\$100 to \$199	1,021	1.2%	30	0.6%	142	3.9%
\$200 to \$299	5,947	7.2%	413	8.4%	266	7.4%
\$300 to \$399	15,763	19.0%	1,746	35.7%	499	13.8%
\$400 or more	60,148	72.4%	2,706	55.3%	2,678	74.3%
Median (dollars)	495	--	415	--	491	--
Gross Rent						
Occupied units paying rent	110,476	--	5,450	--	4,656	--
Less than \$200	893	0.8%	7	0.1%	25	0.5%
\$200 to \$299	2,343	2.1%	101	1.9%	51	1.1%
\$300 to \$499	5,791	5.2%	214	3.9%	216	4.6%
\$500 to \$749	31,881	28.9%	1,700	31.2%	847	18.2%
\$750 to \$999	36,543	33.1%	1,728	31.7%	1,712	36.8%
\$1,000 to \$1,499	25,932	23.5%	1,483	27.2%	1,071	23.0%
\$1,500 or more	7,093	6.4%	217	4.0%	734	15.8%
Median (dollars)	838	--	846	--	934	--
Gross Rent as a Percentage of Household Income						
Less than 15.0 percent	13,111	12.1%	620	11.4%	519	11.3%
15.0 to 19.9 percent	14,505	13.4%	756	13.9%	675	14.7%
20.0 to 24.9 percent	13,967	12.9%	734	13.5%	750	16.3%
25.0 to 29.9 percent	13,146	12.2%	916	16.9%	596	13.0%
30.0 to 34.9 percent	9,086	8.4%	380	7.0%	567	12.3%
35.0 percent or more	44,296	41.0%	2,019	37.2%	1,495	32.5%

Source: 2008-2012 American Community Survey Table DP04

Renter Affordability Comparison				
Household Characteristics	St. Louis County	St. Charles County	St. Louis HMFA	Missouri
Renter Wages & Income				
Area Median Income (AMI)	\$67,100	\$67,100	\$67,100	\$61,065
Estimated Renter Median Income	\$31,749	\$38,449	\$29,123	\$26,994
Estimated Mean Renter Wage	\$14.38	\$10.42	\$14.13	\$12.15
Minimum Wage	\$7.50	\$7.50	\$7.50	\$7.50
SSI Monthly Payment	\$721	\$721	\$721	\$721
Fair Market Rent (FMR)				
One bedroom FMR	\$631	\$631	\$631	\$578
Two bedroom FMR	\$814	\$814	\$814	\$744
Three bedroom FMR	\$1,061	\$1,061	\$1,061	\$1,003
Four bedroom FMR	\$1,203	\$1,203	\$1,203	\$1,126
Rent Affordability				
Rent Affordable at Area Median Income	\$1,678	\$1,678	\$1,678	\$1,527
Rent affordable at 80% of AMI	\$1,342	\$1,342	\$1,342	\$1,221
Rent affordable at 50% of AMI	\$839	\$839	\$839	\$763
Rent affordable at 30% of AMI	\$503	\$503	\$503	\$458
Rent affordable, Full Time Job at Mean Renter Wage	\$748	\$542	\$735	\$632
Rent affordable, Full Time Job at Minimum Wage	\$390	\$390	\$390	\$390
Rent affordable to SSI recipient	\$216	\$216	\$216	\$216
Income needed to afford 0 bdrm FMR	\$21,280	\$21,280	\$21,280	\$19,571
Income needed to afford 1 bdrm FMR	\$25,240	\$25,240	\$25,240	\$23,134
Income needed to afford 2 bdrm FMR	\$32,560	\$32,560	\$32,560	\$29,755
Income needed to afford 3 bdrm FMR	\$42,440	\$42,440	\$42,440	\$40,139
Income needed to afford 4 bdrm FMR	\$48,120	\$48,120	\$48,120	\$45,038
Housing Wage				
Housing Wage for 0 bdrm FMR	\$10.23	\$10.23	\$10.23	\$9.41
Housing Wage for 1 bdrm FMR	\$12.13	\$12.13	\$12.13	\$11.12
Housing Wage for 2 bdrm FMR	\$15.65	\$15.65	\$15.65	\$14.31
Housing Wage for 3 bdrm FMR	\$20.40	\$20.40	\$20.40	\$19.30
Housing Wage for 4 bdrm FMR	\$23.13	\$23.13	\$23.13	\$21.65
0 bdrm housing wage as % of min wage	136%	136%	136%	125%
1 bdrm housing wage as % of min wage	162%	162%	162%	148%
2 bdrm housing wage as % of min wage	209%	209%	209%	191%
3 bdrm housing wage as % of min wage	272%	272%	272%	257%
4 bdrm housing wage as % of min wage	308%	308%	308%	289%
Weekly Work Hours Needed to Afford 2-Bedroom FMR				
At Minimum Wage	83	83	83	76
At Mean Renter Wage	44	60	44	47
Percent of Renters Unable to Afford 2 bdrm FMR	48%	40%	52%	51%

Source: National Low Income Housing Coalition *Out of Reach 2014* analysis

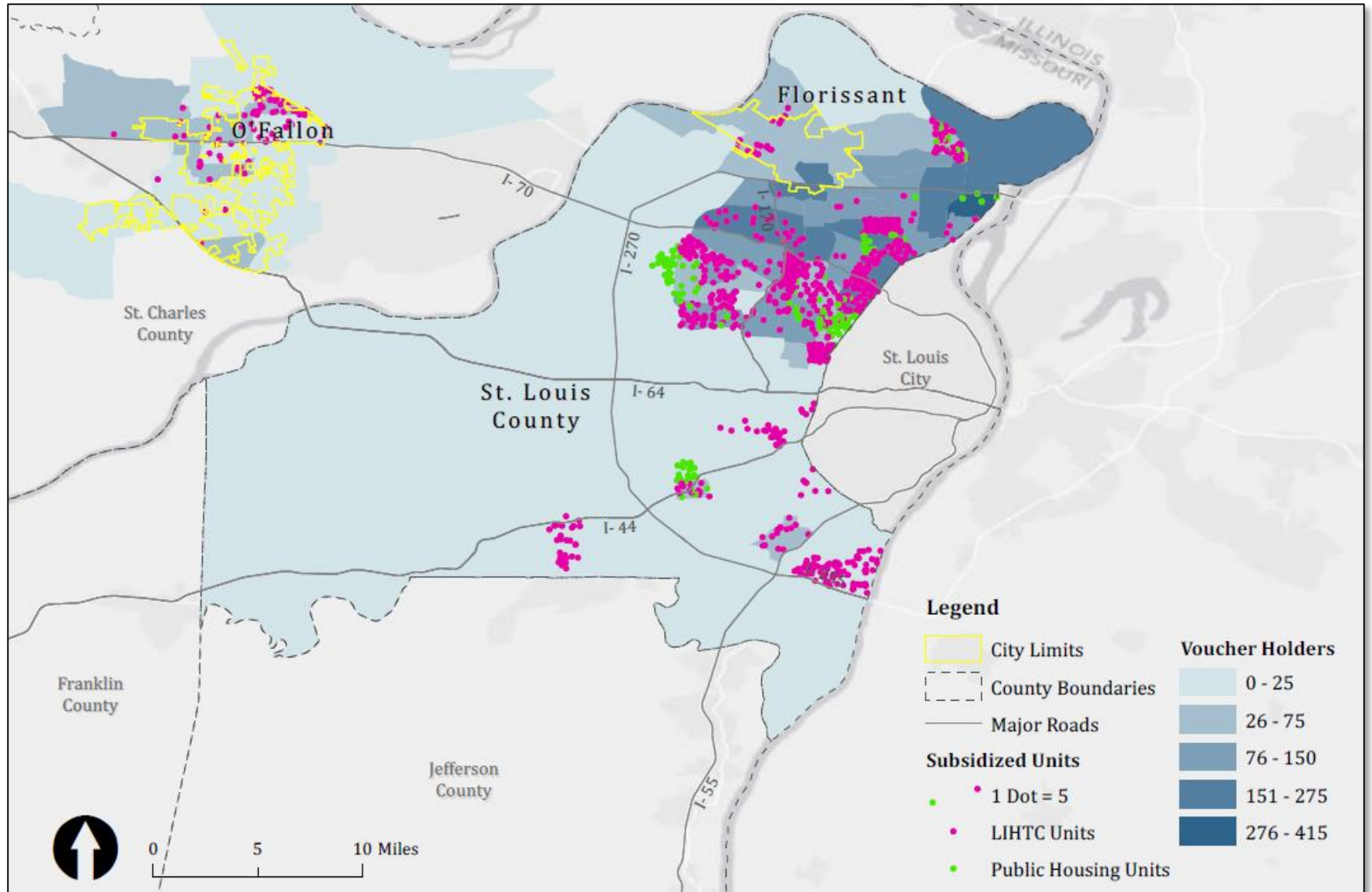
A renter at the mean renter income would need to keep rent costs at or below \$748 to avoid a cost burden in St. Louis County and at or below \$542 in St. Charles County. Individuals earning minimum wage could face the possibility of having more severe cost burdens, as a single full-time minimum wage job would allow only \$390 per month for rent expenses in both counties. In order to afford a two bedroom housing unit (at the FMR of \$814) without spending more than 30% of one's income on rent, a minimum wage worker would need to work 83 hours per week. Based on its analysis, the NLIHC estimates that 48% of renters in St. Louis County and 40% of renters in St. Charles County are unable to afford a 2 bedroom housing unit in those locations.

Locations of Subsidized Housing

A key element of fair access to housing is the availability of affordable housing units throughout a jurisdiction, including areas with diverse populations, strong neighborhood assets, and access to jobs and transit. Concentrations of low cost housing in certain areas can limit access to opportunity, reinforce patterns of segregation, and contribute to concentrations of poverty. The map on the following page identifies locations of Low Income Housing Tax Credit (LIHTC) units, public housing units, and housing choice vouchers by census tract for St. Louis County and O'Fallon. As shown, the heaviest concentrations of each are in North St. Louis County.

Subsidized units are most prevalent in Jennings, Northwoods, St. Ann, Overland, University City, Wellston, Pagedale, Pine Lawn, Hillsdale, Bel-Ridge, and Spanish Lake. The greatest numbers of housing choice voucher users reside in Glasgow Village, Bellefontaine Neighbors, Calverton Park, Kinloch, Berkely, Jennings, Northwoods, Pine Lawn, Bel-Ridge, and Spanish Lake. As the Protected Class Analysis showed, these areas are home to the majority of the County's Black residents, and census tracts within this area have higher concentrations of African Americans than any other parts of the County. Further, the Access to Areas of Opportunity section showed that neighborhoods in North St. Louis County tend to have lower opportunity scores on the dimensions of poverty, school proficiency, and labor market engagement than other areas of the County and the City of O'Fallon.

Subsidized Housing by Census Tract in St. Louis County and Florissant, 2013



Source: HUD's Low Income Housing Tax Credit database, 2013; HUD Picture of Subsidized Households, 2013

Housing Accessibility

As a protected class, people with disabilities have a right to fair housing choice, yet the housing needs of this population can diverge significantly from the needs of other groups. People with mobility impairments are likely to need housing with features that improve accessibility and facilitate maneuverability within the unit. People with visual and hearing deficiencies may need accommodation for service animals and alternative types of fire and smoke alarms. Other people with cognitive disabilities may require the assistance of live-in aids or group home settings. Group homes are discussed elsewhere in this report in sections related to zoning and land use, however the availability of accessible units is generally discussed here.

HUD's Office of Multi-Family Housing maintains a directory by state of HUD-insured and HUD-subsidized properties containing units for the elderly and disabled,¹⁰¹ however the directory is not sortable by factors such as location, disability type, or unit size and availability. The directory for Missouri lists over 500 properties, though this is a statewide listing and narrowing the results to the study area would be challenging. Other more dynamic resources exist for the identification of accessible units, notably a nonprofit housing locator service known as Socialserve.com. A sample search conducted on June 1, 2014 found 377 properties in St. Louis County, 58 properties in Florissant, and 3 properties in O'Fallon with accessible units available for rent. The locations of the properties with accessible units available on this particular date appear on the map below. The vast majority of properties appear clustered in North County, particularly in Florissant, Ferguson, and Calverton Park. It should be noted that this map is only a point-in-time depiction of available units. Accessible units may exist in other communities but had no vacancies at the time this sample search was conducted.

¹⁰¹ http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_13056.pdf



Source: Socialserve.com, Accessed June 1, 2014

Given the limitations inherent in a one-time sample search, it is difficult to draw narrow conclusions based on the results, however, the strong degree to which available properties were concentrated almost exclusively in the communities of North St. Louis County suggests there could be some significant limits to housing choice for people with disabilities requiring accessible rental housing.

Stakeholder Input

Substandard housing conditions were often mentioned as a major issues being faced in the northern part of St. Louis County. This area contains high numbers of vacant and abandoned structures that are often neglected by their owners. Some people thought that more attention should be devoted to eliminating this problem.

Meeting participants and stakeholders think that housing and economic conditions for persons living in areas outside St. Louis County are not as challenging as for persons who are St. Louis County residents. These areas are perceived as having available jobs, higher performing schools, lower crime rates, and better housing conditions.

Home Mortgage Disclosure Act (HMDA) Analysis

Homeownership is vital to a community's economic well-being. To live up to the requirements of fair housing law, all persons must have the ability to live where they want and can afford. Prospective homebuyers need access to mortgage credit, and programs that offer homeownership should be available without discrimination. The task in this Home Mortgage Disclosure Act (HMDA) analysis is to determine the degree to which the housing needs of St. Louis County and O'Fallon residents are being met by home loan lenders.

The Home Mortgage Disclosure Act of 1975 (HMDA) requires most mortgage lending institutions to disclose detailed information about their home-lending activities annually. The objectives of the HMDA include ensuring that borrowers and loan applicants are receiving fair treatment in the home loan market.

The national 2012 HMDA data consists of information for 15.3 million home loan applications reported by 7,400 home lenders, including banks, savings associations, credit unions, and mortgage companies.¹⁰² HMDA data, which is provided by the Federal Financial Institutions Examination Council (FFIEC), includes the type, purpose, and characteristics of each home mortgage application that lenders receive during the calendar year. It also includes additional data related to those applications including loan pricing information, action taken, property location (by census tract), and additional information about loan applicants including sex, race, ethnicity, and income.

The primary data source for this analysis was the 2012 HMDA dataset for St. Louis County and St. Charles County (including O'Fallon), which included a total of 11,244 loan applications in St. Louis County and 6,176 in St. Charles. Within each HMDA record some of the data variables are 100% reported such as "Loan Type," "Loan Amount," "Action Taken," but other data fields are less complete. For example, for 2012 St. Louis County data, 6.1% of the records contained no information on the applicant's and/or co-applicant's sex. Applicant information may be missing because it was not provided by the applicant and the application was completed entirely by mail, the Internet or the telephone. There is no requirement for reporting reasons for a loan denial, and this information was not provided for 28.2% of loan denials in St. Louis County and 29.7% of those in St. Charles.

Missing race, ethnicity, and sex data are potentially problematic for an assessment of discrimination. If the missing data are non-random there may be adverse impacts on the accuracy of the analysis. The reasons for incomplete data are not explained in the HMDA documentation so it is impossible to assess the biases that could arise from analyzing the data. It is possible that the reasons for the omitted data were systematic and therefore may have had a significant but unknown effect on the analytical results. Ideally, any missing data for a specific data variable would affect a

¹⁰² Federal Financial Institutions Examination Council, "Federal Financial Examination Council Announces Availability of 2012 Data on Mortgage Lending," September 18, 2013.

small proportion of the total number of loan records and therefore would have only a minimal effect on the analytical results.

The HMDA data does not include a borrower's total financial qualifications such as an actual credit score, property type and value, loan-to-value ratio or loan product choices. Research has shown that differences in denial rates among racial or ethnic groups can arise from these credit-related factors not available in the HMDA data.¹⁰³ Despite these limitations, the HMDA data play an important role in fair lending enforcement. Bank examiners frequently use the HMDA price data in conjunction with information from loan files to assess an institution's compliance with the fair lending laws.

Loan Approvals and Denials by Applicant Sex

The 2012 HMDA data for St. Louis County included complete information about applicant and co-applicant sex and household income for 10,209 of the total 11,244 home purchase application records. Of these, 3,160 were by male applicants (31.0%), 2,751 by female applicants (26.9%), and 3,509 by male and female co-applicants (41.1%). Of the 5,721 loan application records with complete information in St. Charles County, 32.5% were by male applicants, 23.7% by female applicants, and 43.9% by male and female co-applicants. The table on the following page presents a snapshot of loan approval rates and denial rates calculated for low, moderate, and upper income applicants by sex.¹⁰⁴ Note that denial rates are not simply the complement of approval rates because the "Loan Action" variable allows other outcomes including application withdrawal by the applicant and file closure for incompleteness.

Overall, the table shows that approval rates were from four to sixteen times higher than denial rates, with higher denial rates for low income groups. In St. Louis County, approval rates ranged from 70.3% for low income male/female co-applicants to 85.3% for high income male/female co-applicants. Overall, female applicants had approval and denial rates roughly equivalent to those of male applicants and male/female co-applicants, with the biggest difference in the high income category, where female applicants had a higher approval rating than males by 4.5 percentage points.

As in St. Louis County, approval and denial rates in St. Charles County do not generally show a disparity for female loan applicants. In comparison to approval rates for male and male/female co-applicants, the biggest difference was for approval rates for low income applicants – female applicants were approved loans at rate 10.4 percentage points higher than male/female co-applicants. All other gaps were under 4 percentage points.

¹⁰³ R. B. Avery, Bhutta N., Brevoort K.P., and Canne, G.B. 2012. "The Mortgage Market in 2011: Highlights from the Data Reported Under the Home Mortgage Disclosure Act." Board of Governors of the Federal Reserve System. Federal Reserve Bulletin, Vol. 98, No. 6.

¹⁰⁴ The low-income category includes applicants with a household income below 50% of the 2012 median family income for the St. Louis MSA. The moderate income category includes applicants with household incomes from 50% to 120% MFI, and the upper income category consists of applicants with household incomes above 120% MFI. Based on the 2012 metro MFI of \$70,400, the 50% income threshold is \$35,200 and the 120% threshold is \$84,480.

Loan Approval and Denial Rates by Sex, 2012			
Income Range	Female Applicant(s)*	Male Applicant(s)*	Male/Female Co-Applicants
St. Louis County			
Low Income			
Total Applications	856	673	158
Approval Rate	72.2%	72.4%	70.3%
Denial Rate	16.2%	16.9%	19.0%
Moderate Income			
Total Applications	1,489	1,562	1,360
Approval Rate	80.0%	79.0%	80.7%
Denial Rate	9.0%	10.5%	9.0%
High Income			
Total Applications	406	925	2,780
Approval Rate	84.5%	80.0%	85.3%
Denial Rate	6.4%	9.2%	5.1%
St. Charles County			
Low Income			
Total Applications	354	319	79
Approval Rate	71.2%	69.0%	60.8%
Denial Rate	20.1%	19.4%	30.4%
Moderate Income			
Total Applications	847	1,100	1,133
Approval Rate	80.0%	81.1%	82.3%
Denial Rate	7.9%	9.0%	9.2%
High Income			
Total Applications	153	438	1,298
Approval Rate	83.0%	82.9%	86.6%
Denial Rate	5.2%	5.9%	4.2%

*Includes applications with a single male or female applicant and applications with male/male or female/female co-applicants.

Source: FFIEC 2012 Home Mortgage Disclosure Act Data

Under the provisions of the HMDA, reporting institutions may choose to report the reasons they deny loans to consumers, although there is no requirement to do so. Of the 955 loan denials in St. Louis County, reasons are provided in 72.1% of the cases; in St. Charles County, reasons are provided in 71.8% of cases. In St. Louis County, reporting rates vary by applicant sex – reasons are reported for 67.0% of denials to female applicants, 70.1% of denials to males and 76.6% of denials to male/female co-applicants.

The table that follows breaks down the reasons for loan denials by sex. In both jurisdictions, the four most common denial reasons, regardless of applicant sex, are collateral, credit history, incomplete credit application, and debt-to-income ratio. For female applicants in both counties,

debt-to-income ratio was the top inhibitor for loan approval, affecting 16.8% of denials in St. Louis County and 21.5% in St. Charles. In both areas, compared to males, females were more likely to be denied loans based on collateral and incomplete credit applications, but less likely to be denied based on employment history, unverifiable information, or insufficient cash. Compared to male/female co-applicants, credit history was more likely to be a problem for female applicants in St. Louis County and employment history was less so. Denials to female applicants in St. Charles County were more likely to be due to insufficient collateral or cash when compared to male/female co-applicants.

Reasons for Loan Denial by Applicant Sex, 2012						
Reasons for Denial	Female Applicant(s)*		Male Applicant(s)*		Male/Female Co-Applicants	
	Count	Share	Count	Share	Count	Share
St. Louis County						
Total Denials	303	100.0%	371	100.0%	295	100.0%
Reason provided	203	67.0%	260	70.1%	226	76.6%
Collateral	41	13.5%	47	12.7%	54	18.3%
Credit application incomplete	20	6.6%	18	4.9%	39	13.2%
Credit history	46	15.2%	60	16.2%	34	11.5%
Debt-to-income ratio	51	16.8%	62	16.7%	47	15.9%
Employment history	4	1.3%	9	2.4%	9	3.1%
Insufficient cash	15	5.0%	25	6.7%	14	4.7%
Unverifiable information	12	4.0%	17	4.6%	12	4.1%
Other	14	4.6%	22	5.9%	17	5.8%
Reason not provided	100	33.0%	111	29.9%	69	23.4%
St. Charles County						
Total Denials	149	100.0%	193	100.0%	184	100.0%
Reason provided	103	69.1%	135	69.9%	132	71.7%
Collateral	21	14.1%	18	9.3%	19	10.3%
Credit application incomplete	10	6.7%	9	4.7%	20	10.9%
Credit history	22	14.8%	35	18.1%	30	16.3%
Debt-to-income ratio	32	21.5%	34	17.6%	36	19.6%
Employment history	0	0.0%	9	4.7%	3	1.6%
Insufficient cash	5	3.4%	8	4.1%	4	2.2%
Unverifiable information	6	4.0%	10	5.2%	6	3.3%
Other	7	4.7%	12	6.2%	14	7.6%
Reason not provided	46	30.9%	58	30.1%	52	28.3%

*Includes applications with a single male or female applicant and applications with male/male or female/female co-applicants.

Source: FFIEC 2012 Home Mortgage Disclosure Act Data

Loan Approvals & Denials by Applicant Race & Ethnicity

The below table disaggregates loan approval rates into racial and ethnic categories for different levels of income. Complete race, ethnicity, and income data was available for 9,793 loan records, (87.1% of the total) in St. Louis County and 5,493 (88.9% of the total) in St. Charles. In both areas, the majority of applications were by non-Hispanic White applicants (80.6% in St. Louis and 92.7% in St. Charles); non-Hispanic Black applicants constituted 13.0% and 3.6%, respectively. By comparison, non-Hispanic Whites made up 68.9% of the population in St. Louis County (as of 2010) and 89.1% in St. Charles County. African Americans constituted 23.2% of St. Louis County and 4.1% of St. Charles County. These figures show that, in St. Louis County, Black residents are considerably underrepresented as a share of total loan applicants versus share of total population.

Looking at St. Louis County data, White applicants consistently have higher loan approval rates and lower denial rates than other races/ethnicities, regardless of income. Loan approval rates for White applicants are

For low income applicants, loan approval rates for Whites are 12.0 percentage points above Black applicants, 19.1 points above Asian applicants, and 16.0 points above Hispanic applicants. For White, Asian and Hispanic applicants, this disparity diminishes somewhat as income increases, but for Black applicants it remains relatively constant. Looking at high income applicants, Whites are approved loans at a rate that is 11 percentage points above that of Blacks, 6.4 points above that of Asians and 8.4 points above that of Hispanics. While lower loan approval ratings for minority applicants do not in and of themselves indicate lending discrimination, comparing rates by income range does dispel the concept that lower approval rates are due solely to differences in applicant income.

In St. Charles County, disparity in approval ratings are more modest than in St. Louis County with one exception – low income Blacks are approved loans at a rate that is 38.5 percentage points below that of low income Whites. Note, however, that this is based on a relatively limited number of applications (15) by low income Blacks.

This analysis indicates that loan outcomes for Whites were consistently better than for minority applicants in St. Louis and St. Charles Counties regardless of income. Although this gap generally lessened as income increased, disparities still existed in the high income bracket.

Loan Approval and Denial Rates by Applicant Race and Ethnicity, 2012				
Income Range	Non-Hispanic			Hispanic
	White	Black	Asian	
St. Louis County				
Low Income				
Total Applications	992	501	73	50
Approval Rate	78.0%	66.1%	58.9%	62.0%
Denial Rate	12.2%	19.8%	31.5%	28.0%
Moderate Income				
Total Applications	3,390	648	132	75
Approval Rate	82.9%	70.7%	72.0%	68.0%
Denial Rate	7.0%	17.3%	12.9%	24.0%
High Income				
Total Applications	3,509	120	230	73
Approval Rate	85.1%	73.3%	78.7%	76.7%
Denial Rate	5.3%	15.0%	7.8%	15.1%
St. Charles County				
Low Income				
Total Applications	663	15	8	22
Approval Rate	71.8%	33.3%	62.5%	68.2%
Denial Rate	17.8%	46.7%	12.5%	31.8%
Moderate Income				
Total Applications	2,751	108	50	42
Approval Rate	82.7%	72.2%	76.0%	71.4%
Denial Rate	7.8%	16.7%	6.0%	16.7%
High Income				
Total Applications	1,679	75	55	25
Approval Rate	86.2%	81.3%	81.8%	84.0%
Denial Rate	4.3%	8.0%	1.8%	8.0%

Note: Analysis is based on applicants only and does not include co-applicants.

Source: FFIEC 2012 Home Mortgage Disclosure Act Data

The table on the following page identifies reasons for loan denials by race and ethnicity. For each minority group, the distribution of loan denial reasons is compared to that of White applicants (as a reference group). Note that the small number observations for minority applicants in St. Charles County (6 to 31 denials each) significantly limits the conclusions that can be drawn from this data, and thus this analysis focuses on St. Louis County. Findings are summarized below:

- Denial reasons were not provided for 27.1% of White applicants, compared to 30.4% of Black applicants, 25.4% of Asian applicants, and 34.9% of Hispanic applicants.

- For Whites the top reason for loan denials was collateral (16.0% of cases). Unverifiable information and credit history were each 1.5 times more likely to be the reason for denial for Black applicants than Whites, while incomplete credit applications and collateral were less so.
- In comparison to Whites, Asian applicants were considerably more likely to be denied due to employment history (3.3 times) and unverifiable information (2.6 times). Credit history, incomplete applications, and insufficient cash were less likely to be barriers.

Reasons for Loan Denial by Applicant Race and Ethnicity, 2012							
Reasons for Denial	Non-Hispanic					Hispanic	
	White	Black		Asian			
	Share	Share	Ratio to Whites	Share	Ratio to Whites	Share	Ratio to Whites
St. Louis County							
Total Number of Denials	582	240		59		43	
Reason provided	72.9%	69.6%	0.96	74.6%	1.02	65.1%	0.89
Collateral	16.0%	9.6%	0.60	15.3%	0.95	11.6%	0.73
Credit application incomplete	10.8%	4.2%	0.38	8.5%	0.78	7.0%	0.64
Credit history	13.7%	20.4%	1.49	5.1%	0.37	18.6%	1.35
Debt-to-income ratio	14.9%	19.2%	1.28	23.7%	1.59	9.3%	0.62
Employment history	2.1%	1.7%	0.81	6.8%	3.29	2.3%	1.13
Insufficient cash	6.0%	5.4%	0.90	5.1%	0.85	2.3%	0.39
Unverifiable information	3.3%	5.0%	1.53	8.5%	2.60	4.7%	1.42
Other	6.0%	4.2%	0.69	1.7%	0.28	9.3%	1.55
Reason not provided	27.1%	30.4%	1.12	25.4%	0.94	34.9%	1.28
St. Charles County							
Total Number of Denials	411	31		6		16	
Reason provided	70.3%	71.0%	1.01	100.0%	1.42	87.5%	1.24
Collateral	12.9%	0.0%	0.00	0.0%	0.00	0.0%	0.00
Credit application incomplete	8.0%	6.5%	0.80	0.0%	0.00	12.5%	1.56
Credit history	15.6%	12.9%	0.83	16.7%	1.07	18.8%	1.20
Debt-to-income ratio	18.2%	38.7%	2.12	33.3%	1.83	31.3%	1.71
Employment history	2.2%	0.0%	0.00	16.7%	7.61	0.0%	0.00
Insufficient cash	3.4%	0.0%	0.00	16.7%	4.89	6.3%	1.83
Unverifiable information	3.2%	6.5%	2.04	0.0%	0.00	6.3%	1.98
Other	6.8%	6.5%	0.95	16.7%	2.45	12.5%	1.83
Reason not provided	29.7%	29.0%	0.98	0.0%	0.00	12.5%	0.42

Source: FFIEC 2012 Home Mortgage Disclosure Act Data

Fair Housing Organizations & Activities

Knowledge of Fair Housing Laws and Rights

Public awareness of fair housing laws and issues is crucial to reducing fair housing violations and is an essential step toward stopping housing discrimination. Individuals need to be aware of their fair housing rights and how these protections impact housing choice.

The baseline analysis of public awareness of fair housing issues comes from a national survey *How Much Do We Know* published by HUD in 2002. The study reported that only one-half of the survey respondents could correctly identify as unlawful six of eight scenarios describing illegal fair housing conduct. In addition, HUD's study found that 14% of the adult population claims to have experienced some form of housing discrimination at one point or another in their lives. 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.¹⁰⁵

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 initial survey." 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.¹⁰⁶

The "Future of Fair Housing: Report of the National Commission on Fair Housing and Equal Opportunity" was released in December 2008. The Commission corroborated the HUD survey results when it concluded that "(d)espite a great deal of creative effort by fair housing groups and many in the housing industry, fair housing remains too low in the public's consciousness." The Commission recommended that "a comprehensive fair housing education agenda must be developed" and that "HUD should use its direct budget authority to fund basic education and outreach materials, written in easy-to-understand language, in multiple languages, and in accessible formats, and targeted to the different types of consumers of fair housing services."¹⁰⁷

The results of a public survey conducted by St. Louis County as a part of the preparation of this "A.I" are presented at the end of this segment. Survey results indicate the public knowledge about recognizing acts housing discrimination is still limited.

¹⁰⁵ 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>

¹⁰⁶ 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>

¹⁰⁷ National Commission on Fair Housing and Equal Opportunity, Washington, D.C., "The Future of Fair Housing: Report of the National Commission on Fair Housing and Equal Opportunity," December 2008, Pages 53-55

A logical assumption may be drawn that individuals with greater understanding of fair housing laws are more likely to pursue a formal complaint of discrimination when they feel their rights have been violated. Therefore, there is an association between knowledge of the law, recognition of discriminatory acts, and actions that can be taken to respond to housing discrimination. Continued efforts are needed at the local level to educate, inform, and provide referral assistance on fair housing issues to help residents deal with potential acts of housing discrimination.

Studies by HUD and the National Commission, such as those described above, continue to highlight that a significant number of housing discrimination incidents go unreported. Fair housing education helps individuals learn about the protections in fair housing laws, which in turn enables them to recognize and appropriately report housing discrimination if and when it happens to them.

In addition to fair housing education and outreach, other fair housing services that are available to individuals in St. Louis County and in the cities of Florissant and O'Fallon include the investigation and resolution of housing discrimination complaints; discrimination auditing and testing; and, the dissemination of fair housing information via written material and at fair housing workshops, and seminars. Fair housing agencies also provide landlord/tenant-counseling services that educate property owners and tenants of their rights and responsibilities under fair housing law and other consumer protection legislation as well as mediating disputes between tenants and proprietors.

Federal Fair Housing Education Resources¹⁰⁸

The United States Department of Housing and Urban Development (HUD) is responsible for carrying out the delivery of fair housing information, through its Office of Fair Housing and Equal Opportunity (FHEO). This office is headquartered at the HUD Central Office in Washington, D.C., has a regional office in Kansas City and additional offices in Kansas City and in St. Louis.

HUD FHEO Mission Statement

To create equal housing opportunities for all persons living in America by administering laws that prohibit discrimination in housing on the basis of race, color, religion, sex, national origin, disability, and familial status.

HUD FHEO Duties and Responsibilities

The Office of Fair Housing and Equal Opportunity administers federal laws and establishes national policies that ensure that all Americans have equal access to the housing of their choice.

Activities carried out by the Office of Fair Housing and Equal Opportunity include implementing and enforcing the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the

¹⁰⁸ United States Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, Source: <http://hud.gov/offices/fheo>

Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968.

In addition to these general duties, FHEO:

- manages the Fair Housing Assistance Program (FHAP), administers the award and management of Fair Housing Initiatives Program (FHIP) grants, and proposes fair housing legislation;
- works with other government agencies on fair housing issues;
- reviews and comments on Departmental clearances of proposed rules, handbooks, legislation, draft reports, and notices of funding availability for fair housing considerations;
- interprets policy, process complaints, performs compliance reviews and offer technical assistance to local housing authorities and community development agencies regarding Section 3 of the Housing and Urban Development Act of 1968;
- conducts oversight of the Government-Sponsored Enterprises, Fannie Mae and Freddie Mac, to ensure consistency with the Fair Housing Act and the fair housing provisions of the Federal Housing Enterprises Financial Safety and Soundness Act; and
- works with private industry, fair-housing and community advocates on the promotion of voluntary fair housing compliance.

FHEO – Fair Housing Assistance Program (FHAP)¹⁰⁹

Fair Housing Assistance Program (FHAP) funding is awarded by FHEO, noncompetitively, to State and local agencies that enforce fair housing laws that are substantially equivalent to the Fair Housing Act. FHAP-funded activities help protect families and individuals who believe they have been victims of discrimination on the basis of race, color, national origin, religion, sex, disability or familial status (i.e., the presence of children) in the sale, rental, or financing of housing. Missouri has a Fair Housing law that covers the study area.

FHAP grantee agencies serving the study area include the Missouri Commission on Human Rights. The City of St. Louis Civil Rights Enforcement Agency is also a FHAP agency, but it has no jurisdiction outside the City of St. Louis.

¹⁰⁹ United States Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHAP

FHEO – Fair Housing Initiatives Program (FHIP)¹¹⁰

Fair housing organizations and other non-profits that receive funding through the Fair Housing Initiatives Program (FHIP) assist people who believe they have been victims of housing discrimination.

FHIP organizations partner with HUD to help people identify government agencies that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending "testers" to properties suspected of practicing housing discrimination. Testers are minorities and whites with the same financial qualifications who evaluate whether housing providers treat equally-qualified people differently.

Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application.

In addition to funding organizations that provide direct assistance to individuals who feel they have been discriminated against while attempting to purchase or rent housing, FHIP also has initiatives that promote fair housing laws and equal housing opportunity awareness.

HUD funded two agencies in Missouri under the most recent FHIP funding award period (2012):¹¹¹ the Metropolitan St. Louis Equal Housing Opportunity Council in the City of St. Louis and the Missouri Commission on Human Rights with offices in Jefferson City. Details about both organizations and their fair housing activities are provided later in this section.

Other National Fair Housing Organizations

The National Fair Housing Alliance (NFHA)¹¹²

The National Fair Housing Alliance (NFHA) is a national organization dedicated solely to ending discrimination in housing. NFHA consists of more than 220 private, non-profit fair housing organizations, state and local civil rights agencies, and individuals.

NFHA holds conferences, workshops, and training programs, including a Fair Housing School which trains representatives of public and private fair housing organizations on fair housing basics, investigation and testing of real estate and lender discrimination, and organizational operations.

The NFHA also works with the private and public partners to promote better knowledge about housing discrimination.

¹¹⁰ United States Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity, http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHIP

¹¹¹ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal opportunity, Source: http://portal.hud.gov/hudportal/documents/huddoc?id=fy2fhip_granteelist.pdf

¹¹² National Fair Housing Alliance, Source: <http://www.nationalfairhousing.org>

*The Leadership Conference on Civil and Human Rights*¹¹³

The Leadership Conference on Civil and Human Rights, originally named the Leadership Conference on Civil Rights when it was created in 1950, was organized to fight for equal opportunity and social justice. In January 2010, the Leadership Conference on Civil Rights changed its name to The Leadership Conference on Civil and Human Rights.

The Leadership Conference lobbied for the passage of the Civil Rights Act of 1957, the Civil Rights Act of 1960, the Civil Rights Act of 1964, the Voting Rights Act of 1965, the Fair Housing Act of 1968, and also helped to organize the 1963 March on Washington.

State Fair Housing Agencies in Missouri

Missouri Commission on Human Rights

“The mission of the Missouri Commission on Human Rights is to develop, recommend, and implement ways to prevent and eliminate discrimination and to provide fair and timely resolutions of discrimination claims through enforcement of the Missouri Human Rights Act. The Commission investigates complaints of discrimination in housing, employment, and places of public accommodations based on race, color, religion, national origin, ancestry, sex, disability, age (in employment only), and familial status (in housing only).”¹¹⁴

The Missouri Commission on Human Rights enforces the Missouri Human Rights Act. This law prohibits discrimination in housing, employment, and places of public accommodations based on race, color, religion, national origin, ancestry, sex, disability, age (in employment only), and familial status (in housing only).

The Act also protects individuals against retaliation for filing a complaint of discrimination, testifying or assisting in an investigation or other processes. Individuals are also protected from discriminatory acts on the basis of their association with a person in a protected category. Individuals who believe they have been discriminated against for any of those reasons can file a complaint with the Missouri Commission on Human Rights (MCHR).

The Act makes it illegal to discriminate in any aspect of housing because of an individual’s race, color, national origin, ancestry, religion, sex, familial status (children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability:

- Refusing to rent or sell housing
- Refusing to negotiate for the sale or rental of housing

¹¹³ The Leadership Conference on Civil and Human Rights, Source: <http://www.civilrights.org>

¹¹⁴ Missouri Department of Labor, Commission on Human Rights, Source: <http://labor.mo.gov/mohumanrights>

- Setting different terms, conditions, or privileges for sale or rental of a dwelling
- Making housing unavailable to certain individuals
- Falsely denying that housing is available for inspection, sale, or rental
- Providing different housing services or facilities to certain individuals
- For profit, persuade owners to sell or rent (blockbusting)
- Denying certain individuals access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In mortgage lending, the following actions are prohibited, if based on race, color, religion, national origin, ancestry, sex, familial status, or disability:

- Refusing to make a mortgage loan
- Refusing to provide information regarding loans
- Imposing different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminating in appraising a property
- Refusing to purchase a loan
- Setting different terms or conditions for purchasing a loan.

In addition, it is illegal for a housing provider in Missouri to:

- Harass an individual on the basis of race, color, religion, national origin, ancestry, sex, familial status, or disability
- Retaliate against an individual for filing a complaint of discrimination, participating in an investigation or hearing, or opposing discriminatory practices
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, national origin, ancestry, sex, familial status, or disability.

Additional Housing Protection for Persons with Disabilities

For persons with disabilities that substantially limits one or more major life activities, has a record of such a disability, or is regarded as having such a disability, landlords may not:

- Refuse to let the tenant make reasonable modifications to your dwelling or common-use areas, at your expense, if necessary for you to use and enjoy the housing.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the person with a disability to use and enjoy the housing.

Housing Opportunities for Families

An apartment building or community may not exclude families with children or pregnant women unless it qualifies as housing for older persons.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- It houses at least one person who is 55 years of age or older in at least 80 percent of the occupied units, and adheres to a policy that demonstrates intent to house persons who are 55 years of age or older
- It is intended for, and solely occupied by, persons 62 years of age or older
- It is specifically designed and operated to assist elderly persons, as defined in a state or federal program.

Agencies Primarily Serving Persons with Disabilities

Governor's Council on Disability¹¹⁵

The Governor's Council on Disability is the state organization that provides educational programs on disability rights and awareness, universal design, and technical assistance on disability rights and housing.

Missouri Assistive Technology (Moat)¹¹⁶

MoAT administers the Show-Me Loans Program for home access modifications for persons with disabilities.

Missouri Department of Mental Health, Division of Developmental Disabilities¹¹⁷

Created in 1974 and located in the Missouri Department of Mental Health, the Division of Developmental Disabilities (DD), serves a persons with developmental disabilities such as intellectual disabilities, cerebral palsy, head injuries, autism, epilepsy, and certain learning disabilities. The conditions must have occurred before age 22, with the expectation that they will continue.

To be eligible for services from the Division, persons with these disabilities must be substantially limited in their ability to function independently.

The agency has regional offices throughout Missouri. The St. Louis County Regional Office is the primary point of entry into the system for St. Louis County, while the St. Louis Tri County Regional Office is the primary point of entry into the system for St. Louis City, St. Charles and Jefferson counties.

The Division of Developmental Disabilities completed a Housing Plan in 2012 with the following mission:

¹¹⁵ State of Missouri, Governor's Council on Disability, "Missouri's Guide to Housing Assistance Programs," Source: <http://dmh.mo.gov/docs/ada/housingbook.pdf>

¹¹⁶ State of Missouri, Governor's Council on Disability, "Missouri's Guide to Housing Assistance Programs," Source: <http://dmh.mo.gov/docs/ada/housingbook.pdf>

¹¹⁷ Missouri Department of Mental Health, Division of Developmental Disabilities, Source: <http://dmh.mo.gov/dd/about.htm>

“To develop quality, affordable, accessible housing for people with disabilities in safe locations where they can access support services, transportation, employment, and recreation throughout their lifespan.”

The agency has regional offices throughout Missouri. The St. Louis County Regional Office is the primary point of entry into the system for St. Louis County, while the St. Louis Tri County Regional Office is the primary point of entry into the system for St. Louis City, St. Charles and Jefferson counties.

Developmental Disabilities Board of St. Charles County¹¹⁸

The Developmental Disabilities Board of St. Charles County (DDRB) is a public organization governed by a nine member Board of Directors appointed by the St. Charles Executive. The DDRB provides funding to organizations that serve individuals 17 years old and older with developmental disabilities in St. Charles County. Funding for these contracts by the DDRB is derived from property taxes calculated from sixteen cents per \$100.00 of assessed property valuation.

The Services that are funded by the DDRB include: adult day programs, residential services, advocacy services, supported daycare, early intervention, family support, transitional programs, respite, sheltered workshop, adaptive equipment, supported employment and recreation.

¹¹⁸ Developmental Disabilities Board of St. Charles County <http://www.ddrb.org>

Local Fair Housing Organizations

HUD-Approved Housing Counseling Agencies

The AI study area is served by a number of HUD-approved housing counseling agencies. While some of the agencies provide general purpose counseling for a number of housing-related issues, a few of the agencies specifically list “Fair Housing” as one of their services.

The following table contains information on the housing counseling agencies in the St. Louis area and notes those agencies specifically providing Fair Housing services to area residents.

HUD-Approved Housing Counseling Agencies in the St. Louis Area May 2014		
Agency	Counseling Services	Fair Housing Listed
Better Family Life, Inc.	<ul style="list-style-type: none"> - Financial Management/Budget Counseling - Financial, Budgeting And Credit Repair Workshops - Home Improvement And Rehabilitation Counseling - Mortgage Delinquency And Default Resolution Counseling - Pre-Purchase Counseling - Pre-Purchase Homebuyer Education Workshops - Rental Housing Counseling 	No
Beyond Housing	<ul style="list-style-type: none"> - Mortgage Delinquency And Default Resolution Counseling - Non-Delinquency Post Purchase Workshops - Pre-Purchase Counseling - Pre-Purchase Homebuyer Education Workshops - Predatory Lending Education Workshops 	No
Catholic Charities Housing Resource Center	<ul style="list-style-type: none"> - Fair Housing Pre-Purchase Education Workshops - Financial Management/Budget Counseling - Home Improvement And Rehabilitation Counseling - Mortgage Delinquency And Default Resolution Counseling - Non-Delinquency Post Purchase Workshops - Pre-Purchase Counseling - Pre-Purchase Homebuyer Education Workshops - Predatory Lending Education Workshops - Rental Housing Counseling - Services For Homeless Counseling 	Yes
Clearpoint Credit Counseling Solutions - St. Louis Branch	<ul style="list-style-type: none"> - Financial Management/Budget Counseling - Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling 	No

HUD-Approved Housing Counseling Agencies in the St. Louis Area (continued)
May 2014

Agency	Counseling Services	Fair Housing Listed
Community Action Agency of St. Louis County	<ul style="list-style-type: none"> - Fair Housing Pre-Purchase Education Workshops - Financial Management/Budget Counseling - Financial, Budgeting and Credit Repair Workshops - Non-Delinquency Post Purchase Workshops - Pre-purchase Counseling - Pre-purchase Homebuyer Education Workshops - Predatory Lending Education Workshops - Services for Homeless Counseling 	Yes
Housing Options Provided For The Elderly	<ul style="list-style-type: none"> - Rental Housing Counseling - Reverse Mortgage Counseling - Services for Homeless Counseling 	No
Justine Petersen Housing And Reinvestment Corp.	<ul style="list-style-type: none"> - Financial Management/Budget Counseling - Home Improvement and Rehabilitation Counseling - Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling 	No
Legal Services Of Eastern Missouri, Inc.	<ul style="list-style-type: none"> - Fair Housing Pre-Purchase Education Workshops - Mortgage Delinquency And Default Resolution Counseling - Predatory Lending Education Workshops - Rental Housing Counseling - Services For Homeless Counseling 	Yes
Lemay Housing Partnership, Inc.	<ul style="list-style-type: none"> - Fair Housing Pre-Purchase Education Workshops - Financial Management/Budget Counseling - Home Improvement And Rehabilitation Counseling - Non-Delinquency Post Purchase Workshops - Pre-Purchase Counseling - Pre-Purchase Homebuyer Education Workshops - Predatory Lending Education Workshops - Rental Housing Counseling - Rental Housing Workshops 	Yes
NACA (Neighborhood Assistance Corporation of America) St. Louis, Mo	<ul style="list-style-type: none"> - Fair Housing Pre-Purchase Education Workshops - Financial Management/Budget Counseling - Mortgage Delinquency And Default Resolution Counseling - Non-Delinquency Post Purchase Workshops - Pre-Purchase Counseling - Pre-Purchase Homebuyer Education Workshops - Predatory Lending Education Workshops 	Yes

HUD-Approved Housing Counseling Agencies in the St. Louis Area (continued)
May 2014

Agency	Counseling Services	Fair Housing Listed
Urban League Of Metropolitan Saint Louis	- Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling - Rental Housing Counseling	No
Youth Education And Health In Soulard	- Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling - Pre-purchase Homebuyer Education Workshops - Rental Housing Counseling - Rental Housing Workshops - Resolving/Preventing Mortgage Delinquency Workshops - Services for Homeless Counseling	No
Clearpoint Credit Counseling Solutions - Saint Peters Branch	- Financial Management/Budget Counseling - Mortgage Delinquency and Default Resolution Counseling - Pre-purchase Counseling	No

Source: U.S. Department of Housing and Urban Development,
<http://www.hud.gov/offices/hsg/sfh/hcc/hcs.cfm?webListAction=search&searchstate=MO>

HUD does not publish performance results for these agencies, but HUD's Office of Housing Counseling Services does provide data at the national level, compiled from all agencies that receive HUD housing counseling funds. The national statistics shows that fair housing workshops made up only a small share of training and information provided to clients by housing counseling agencies in 2013. Of the 3.7 million persons served by these agencies, only 14,596 (0.4%) participated in a fair housing workshop. Based on these results, one could conclude that fair housing training is not the highest priority activity among these agencies and perhaps among their clients.

FHIP Recipient Agencies Serving the Study Area

The two organizations that received Fair Housing Initiative Program (FHIP) 2012 funding from HUD are listed below. No funds have been awarded by HUD for FHIP since FFY 2012.

- Missouri Commission on Human Rights (described under State Fair Housing Agencies) and
- Metropolitan St. Louis Equal Housing Opportunity Council.

Metropolitan St. Louis Equal Housing Opportunity Council¹¹⁹

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) was created in 1992 as a product of the Confluence St. Louis (now Focus St. Louis) task force on Racial Polarization.

¹¹⁹ The Metropolitan St. Louis Equal Housing Opportunity Council; Source: <http://www.ehocstl.org/index.html>

The EHOC seeks to ensure equal access to housing for all people through education, counseling, investigation and enforcement and is the only private, not-for-profit fair housing enforcement agency in the Metropolitan St. Louis area. EHOC serves St. Louis County and the cities of Florissant and O'Fallon.

EHOC's activities include:

- Education on fair housing laws for housing providers (lenders, landlords, real estate agents and insurance agents), local governmental bodies and the general public (especially those who are most likely to experience illegal discrimination); and
- Enforcement actions against those whom EHOC investigates and determines have committed illegal discrimination; and
- Community outreach and public awareness.

One of the most important yearly fair housing education EHOC events is the Annual Regional Fair Housing Training Conference. The Conference is held during April, which is designated by HUD as Fair Housing Month.

The 2014 Conference, "Breaking Down Barriers to Housing Opportunities: A Community Workshop," was held on April 4, 2014 at the Missouri History Museum in St. Louis. The workshop explored barriers to equal housing in the St Louis region and developed community action plans to overcome barriers and increase access to opportunities. Topics included proposed changes to HUD regulation governing "Affirmatively Further Fair Housing," identifying barriers in the St. Louis region; disparities in health outcomes in St. Louis; crime-free housing ordinances; and barriers to immigrants' access to housing.

Other Organizations Providing Fair Housing Services

Beyond Housing¹²⁰

Beyond Housing is a community development organization, created in 1975, that works in a specific areas like the Normandy School District to provide holistic services to low-income families on education, health, job readiness/access and economic development.

The organization has been recognized on a local, national, and international level for unique approaches toward meeting the needs of low-income families and communities.

Legal Services of Eastern Missouri¹²¹

Legal Services of Eastern Missouri (LSEM) was originally incorporated in 1956 as a non-profit corporation named the Legal Aid Society for the City and County of St. Louis. Prior the creation of

¹²⁰ Beyond Housing, <http://www.beyondhousing.org>

¹²¹ Legal Services of Eastern Missouri, <http://www.lsem.org>

the Legal Aid Society, the City of St. Louis and the Bar Association of Metropolitan St. Louis established a volunteer legal aid bureau.

During the 1970s, five additional counties in the St. Louis metropolitan area were added to the service area and the organization was renamed Legal Services of Eastern Missouri. In 1993, the service area was expanded to another 14 counties through a merger with the Legal Services of Northeast Missouri program in Hannibal, Missouri. Today, Legal Services of Eastern Missouri, Inc. (LSEM) provides free civil legal assistance to elderly and low-income people in 21 counties in Eastern Missouri.¹²²

The LSEM has a Housing Unit that represents clients in all housing matters including landlord tenant disputes, subsidized housing issues, fair housing issues, and home ownership matters. The Housing Unit also assists homeless individuals in removing obstacles to obtaining housing.

Community Action Agency of St. Louis County¹²³

The Community Action Agency of St. Louis County, Inc. (CAASTLC) is part of the national network of federally funded Community Action Agencies (CAAs), created by the Economic Opportunity Act of 1964.

Originally incorporated as Metroplex, Inc. in 1968, the organization was operated by the Human Development Corporation of Metropolitan St. Louis. Ten years later, Metroplex, Inc. became a separate organization whose mission was to carry out anti-poverty programs for St. Louis County, excluding Wellston.

The organization has undergone two additional name changes since it was named Metroplex, Inc. In 1996, the name was changed to STEP, Inc. and became the Community Action Agency of St. Louis County (CAASTLC) in 2003.

The agency provides the following housing program services:

- Helping clients build savings through Individual Development Accounts
- Providing rent and mortgage assistance payments
- Placement of clients with credit issues into permanent housing
- Assists with re-negotiation of unfair leases
- Provides credit and financial counseling.

Catholic Charities¹²⁴

Catholic Charities of St. Louis (CCSTL) has been helping people in need since 1912.

¹²² The counties served by LSEM are Adair, Clark, Franklin, Jefferson, Knox, Lewis, Lincoln, Macon, Marion, Monroe, Montgomery, Pike, Ralls, Schuyler, Scotland, Shelby, St. Charles, St. Louis City, St. Louis County, Warren and Washington.

¹²³ Community Action Agency of St. Louis County, <http://www.caastlc.org/about-caastlc.html>

¹²⁴ Catholic Charities of the Archdiocese of Saint Louis, <http://www.ccstl.org>

Using eight agencies at 50 sites in 11 counties in the St. Louis metropolitan area, CCSTL provides the following services:

- Cardinal Ritter Senior Services provides a continuum of care to senior adults including social, health and housing services.
- Catholic Charities Community Services provides legal assistance, refugee services, housing crisis and homeless prevention to individuals and families in need.
- Catholic Family Services is a professional counseling agency which provides community-based education and mental health services at numerous outreach locations.
- Good Shepherd Children & Family Services provides the highest quality foster care, adoption, expectant parent counseling, advocacy and residential services.
- Marygrove provides day and residential treatment for children and youth, including diagnosis, therapy and treatment, education and healthcare. Marygrove also provides crisis care, therapeutic foster care, transitional and independent living programs.
- Queen of Peace Center is a family-centered behavioral healthcare provider for women with addiction, their children and families.
- Saint Martha's Hall offers shelter, counseling and education to battered women and their children.
- St. Patrick Center provides opportunities for self-sufficiency and dignity to people who are homeless or at risk of becoming homeless.

Housing programs provided by Catholic Charities for the AI study area include:

- Transitional Housing

The St. Philippine Home provides therapeutic structured living for up to two years for homeless women and their children. The programs at St. Philippine Home seek to stabilize families during the transition between substance abuse treatment and recovery. Services provided at the St. Philippine Home include:

- 24 hour residential services and 33 beds;
- Drug and alcohol, education and group and individual, family and co-dependency counseling;
- Dual diagnosis services;
- Life skills and employment focus;
- Parenting education;
- Dual diagnosis services available; and
- Childcare and transportation available.

Other transition housing includes Cathedral Tower (26 residential treatment beds for women and their children), the Annex (19 residential supportive recovery beds for women and their children), and Our Lady of Perpetual Help (24 residential treatment beds for pregnant and postpartum women and their children.)

- Permanent Housing

Queen of Peace Center offers assistance to those needing permanent housing, including:

- Rental assistance for individuals and families who are city residents, homeless, low income or disabled by mental illness, drug addiction or HIV/AIDS;
- Property development;
- Liaison support for landlord, tenant and local referring agencies; and
- Help to meet HUD quality standards.

Several permanent housing locations are available for women and their children, including:

- Cathedral Tower – 8 units of efficiency apartments for women;
- The Annex at Pershing – 7 units of efficiency apartments for women;
- Pope – 12 units of 2 and 3 bedroom apartments for women with co-occurring disorders and their children; and
- Visitation – 11 units of 1 and 2 bedroom apartments for women and their children.

Better Family Life, Inc.¹²⁵

Better Family Life, Inc. (BFL) is a non-profit community development corporation organized in February 1983 to find solutions to crises within African American families. Its mission is “to plan and establish social, cultural, artistic, youth, economic, housing and educational programs that help to promote positive and innovative changes within the metropolitan St. Louis area.” The BFL’s programs are directed to people who are unemployed, underemployed, disadvantaged and skill-deficient. The St. Louis area is served primarily by centers in the City of St. Louis, with two centers also located in the study area: Florissant, and Wellston.

The BFL carries out housing activities, including general and fair housing counseling, foreclosure intervention, home repairs, and downpayment assistance.

Neighborhood Assistance Corporation of America¹²⁶

The Neighborhood Assistance Corporation of America (NACA) is a non-profit community advocacy and homeownership membership organization originally created in 1988 with offices located in 27 states and in the District of Columbia. Two NACA offices are located in Missouri: St. Louis and Kansas City.

¹²⁵ Better Family Life, Inc., Source: <http://www.betterfamilylife.org>

¹²⁶ Neighborhood Assistance Corporation of America, <https://www.naca.com>

While NACA is more widely known as a lender for mortgages and downpayment assistance loans, it is also a HUD-approved Housing Counseling agency that provides fair housing counseling and education to its clients.

*Lemay Housing Partnership, Inc.*¹²⁷

The Lemay Housing Partnership was created in 1998 as non-profit organization to help preserve and revitalize housing and neighborhoods. The organization functions as a Community Housing Development Organization under HUD's HOME Program.

The Lemay Housing Partnership, Inc. (LHP) is focused on three primary areas to serve the community:

- LHP provides Home Repair services to low and moderate income residents of Lemay.
- LHP administers a Homebuyer counseling and Homeowner education program.
- LHP develops residential housing in the Lemay community.

Homebuyer and Homeowner Education Workshops are generally free or low cost, with classes such as: Selecting a contractor, Creating a household spending plan, Avoiding Foreclosure, and Services for seniors. Fair Housing information is provided to participants.

Public Knowledge of Fair Housing Issues

As a part of the preparation of the AI for St. Louis County and for the Cities of Florissant and O'Fallon, an online survey regarding local housing conditions was conducted. Several survey questions queried respondents regarding housing discrimination and knowledge of fair housing rights.

A survey question asked, "Do you know your fair housing rights?" The responses were 43.1% said "Yes," 27.5% indicated "Somewhat," while 29.4% said "No."¹²⁸ The survey responses revealed that less than one-half (43.1%) knew their housings rights.

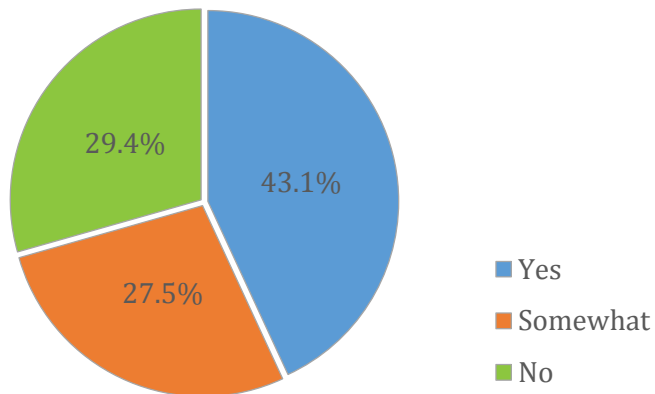
The survey then asked "Do you know where to file a housing discrimination complaint?"¹²⁹ The responses were: 47.1% "Yes," 15.7% "Somewhat," and 37.3% "No." Similar to the previous question, less than one-half (47.1%) knew where to file a complaint.

¹²⁷ Lemay Housing Partnership, Inc., <http://www.lemayhousing.org>

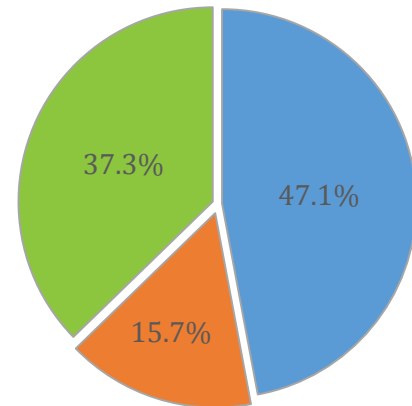
¹²⁸ St. Louis County, Missouri, Office of Community Development, "Fair Housing Survey: St. Louis County, Florissant, O'Fallon," 2014, Question 27

¹²⁹ St. Louis County, Missouri, Office of Community Development, "Fair Housing Survey: St. Louis County, Florissant, O'Fallon," 2014, Question 28

Do you know your Fair Housing Rights?



Do you know where to file a housing discrimination complaint?



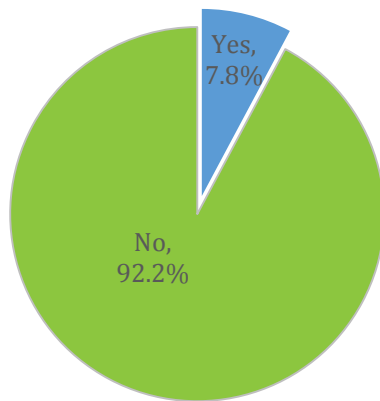
In response to the question: "Since living in the area, have you experienced housing discrimination?" Slightly more than 9 out every 10 (92.2%) said "No."

For persons who commented that they had experienced housing discrimination, 80% responded that the discriminatory acts toward them were carried out by a landlord/property manager, while 20% indicated that a city/county staff person was responsible.¹³⁰

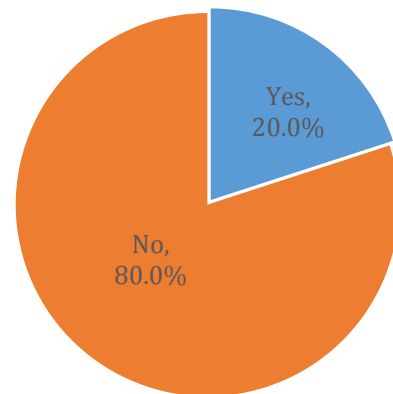
¹³⁰ St. Louis County, Missouri, Office of Community Development, "Fair Housing Survey: St. Louis County, Florissant, O'Fallon," 2014, Question 24

For the persons who had experienced housing discrimination, only 20% had filed a report.¹³¹

Since living in the area, have you experienced housing discrimination?



Did you file a report of that discrimination?



If you experience housing discrimination, who discriminated against you?



¹³¹ St. Louis County, Missouri, Office of Community Development, "Fair Housing Survey: St. Louis County, Florissant, O'Fallon," 2014, Question 25

Conclusion

In the St. Louis County, the City of Florissant, and the City of O'Fallon, many organizations provide fair housing education and fair housing enforcement.

While the survey had a limited number of responses, from the completed surveys received, the number of persons who knew their fair housing rights is lower than desirable. Additional efforts are still needed to arm the residents of the region with more knowledge about what constitutes housing discrimination and the steps to be taken if discriminatory acts occur.

Housing Discrimination Complaints

The HUD Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that ensure that all Americans have equal access to the housing of their choice. Individuals who believe they are victims of housing discrimination can file a fair housing complaint through the respective HUD Regional FHEO office and/or through local or state fair housing organizations. Typically, when a complaint is filed with one or more of these agencies, a case is opened and an investigation of the allegations of housing discrimination is initiated.

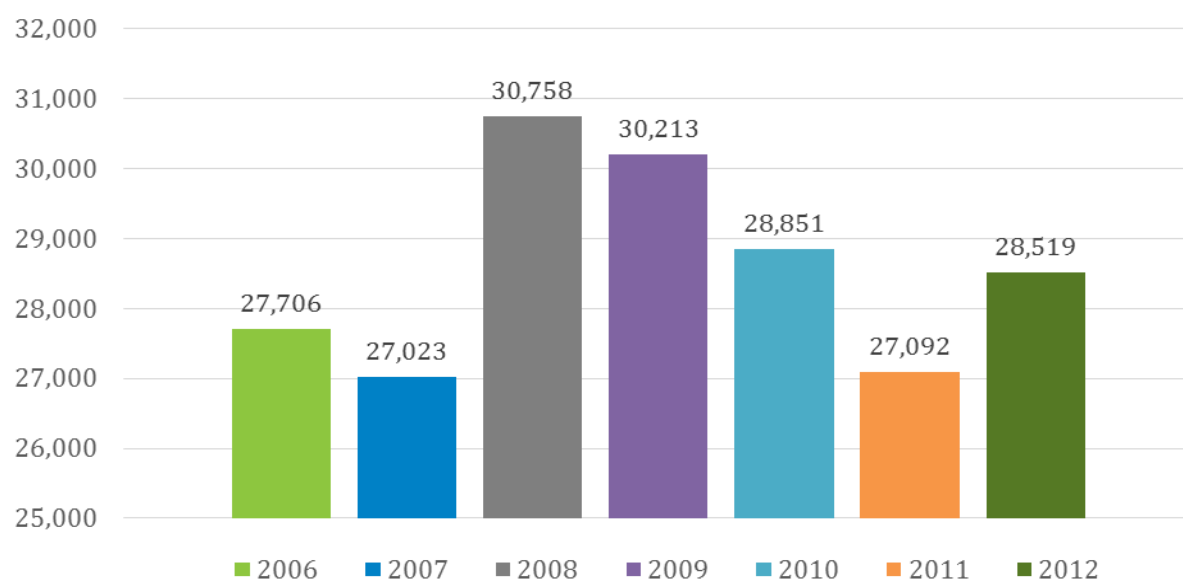
If the complaint is not successfully mediated, the FHEO determines whether reasonable cause exists to believe that a discriminatory housing practice has occurred. Where reasonable cause is ascertained, the parties to the complaint are notified by HUD's issuance of a "Determination," as well as a "Charge 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 to have the matter litigated in federal court.

National Housing Discrimination Complaints

According to the National Fair Housing Alliance (NFHA) 2013 Fair Housing Trends Report, national data continues to show housing discrimination acts that result in complaints filed with fair housing agencies. The data in 2012 showed that more disability complaints had been filed than any other type of fair housing complaints. The NFHA suggests that this may be attributed to apartment 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. Total complaints filed nationally, as reported by NFHA are reflected in the chart that follows.

While the number of housing discrimination complaints at the national level may not correlate in a mathematical way with the number of similar incidents in the study area, these national statistics serve to illustrate that housing discrimination remains a national problem.

National Fair Housing Complaints



Source: National Fair Housing Alliance, 2013 Fair Housing Trends, April 13, 2013

Local Housing Discrimination Complaints

Housing discrimination complaints in St. Louis County and the City of O'Fallon may be filed with HUD; the Missouri Commission on Human Rights; the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC); or, in some jurisdictions, with the local human rights/relations commission (*see e.g.*, St. Louis County Code of Ordinances Sec. 717.010 et seq.; City of Sunset Hills Code of Ordinances Sec. 2-359).

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 Missouri and Iowa, Kansas, 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 discrimination and hate violence.

A FOIA request was sent to the appropriate local FHEO in Kansas City, KS, for fair housing complaint data to include the total number of complaints, the transaction area, the status, and the basis/bases of complaints received by HUD originating in St. Louis County or the City of O'Fallon for the period January 1, 2009, through March 31, 2014.

In response, HUD stated that its database showed that no information was found for cases filed in St. Louis County.

The following table identifies the number of complaints filed in O'Fallon (where the alleged discrimination occurred), the status of the complaint, and the bases for the complaint, for the period January 1, 2009 – March 31, 2014.

Complaints of Housing Discrimination Received by HUD for St. Louis County & O'Fallon		
	St. Louis County	City of O'Fallon
# Filed	No data found	3
# Closed		3
#Open		0
With Cause		2
Settlement		2 - Yes
Disability		3
Color/Race		
Familial Status		
Marital Status		
Sex		
National Origin		
Age		
Citizenship		
Religion		
Retaliation		
Harassment		
Other/Criminal Status		

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

According to HUD's field office, from January 1, 2009, through March 31, 2014, there were three discriminatory housing complaints filed with HUD regarding housing in St. Louis County and the City of O'Fallon. Of these complaints, two were determined to have cause and were settled through conciliation. As of March 31, 2014, three of three complaints had been closed. The complaint data as documented by the FHEO are found in full in the Appendix.

All three of the complaints for this period investigated by the FHEO were based on disability.

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. EHOC provides fair housing education and outreach services, and also receives and investigates fair housing discrimination complaints for the Greater St. Louis Area.

On behalf of St. Louis County, a request was made to EHOC for data reflecting the total number of housing discrimination complaints received, the transaction area of all such complaints received, the basis/bases of all such complaints received, and the status of all such complaints received, for the period January 1, 2009, through March 31, 2014. The following information was provided by EHOC regarding complaints of housing discrimination:

Complaints of Housing Discrimination Received by EHOC for St. Louis County and O'Fallon (01/2009-03/2014)		
	St. Louis County	City of O'Fallon
# Complaints Received	79	1
Transaction Area:		
Rental	43	
Lending	23	1
Advertisement	11	
Basis:		
Disability	21	
Color/Race	32	1
Familial Status	20	
Sex	11	
National Origin	6	

From January 1, 2009, through March 31, 2014, EHOC received 80 complaints for alleged housing discrimination occurring in St. Louis County or the City of O'Fallon. Among the complaints received by EHOC, allegations of discrimination based on color/race were the most common (33 complaints). Discrimination with regard to disability ranked second (21 complaints), and familial status complaints followed at 20 complaints. The majority of the complaints received occurred in the transaction area of rental housing (43 complaints), followed by lending (23 complaints), and discriminatory advertising (11 complaints).

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 discrimination in employment and places of public accommodations) based on race, color, religion, national origin, ancestry, sex, disability, age (in employment only), and familial status (in housing only). The MCHR is tasked with upholding and enforcing the Missouri Human Rights Act (MO. Rev. Stat. Chapter 213 et seq.).

For this analysis, housing discrimination complaint data was requested from the MCHR by letter dated May 1, 2014, for data reflecting the total number of housing discrimination complaints received, the transaction area of all such complaints received, the basis/bases of all such complaints

received, and the status of all such complaints received, for the period January 1, 2009, through March 31, 2014. The MCHR reports data to and relies on a database maintained by the Federal Equal Employment Opportunity Council (EEOC), and accordingly requested the data needed for this report from the EEOC.

Complaints of Housing Discrimination Received by the MCHR for St. Louis County and O'Fallon (01/2009-03/2014)		
	St. Louis County	City of O'Fallon
# Complaints Received	201	27
# Open	26	2
No Cause finding issued	95	10
Settlement w/ benefits	28	2
Successful conciliation	0	1
Withdrawal w/ benefits	24	5
Administrative closure	28	7
Basis:		
Color/Race	68	15
Sex	23	3
National Origin	9	1
Religion	7	
Retaliation	11	

From January 1, 2009, through March 31, 2014, the MCHR received 228 complaints for alleged housing discrimination occurring in St. Louis County or the City of O'Fallon. Among the complaints received by the MCHR, allegations of discrimination based on color/race were the most common (83 complaints). Discrimination with regard to sex ranked second (26 complaints), followed by retaliation at 11 complaints. After investigation, a "No Cause" finding was issued for 105 (46%) of the complaints filed. Thirty-one cases were settled with benefits or successful conciliation.

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 housing discrimination. 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. Louis County, the largest numbers of complaints filed were alleged claims of discrimination based on color/race and disability.

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. Louis County represent the location in which the discrimination occurred and may include complaints filed by residents of other jurisdictions.

Due to time and cost limitations, a request for fair housing complaint data was not made to each specific jurisdiction within the St. Louis County study area, although some individual jurisdictions do accept complaints regarding fair housing discrimination and have their own processes for handling those.

Housing Discrimination Lawsuits

Below is a summary of the nature, extent, and disposition of significant housing discrimination lawsuits filed and/or adjudicated between 2005 and May 2014 involving or affecting parties and local governments within the St. Louis County study area, and which may impact fair housing choice within the study area. Several cases that involved parties and jurisdictions outside the St. Louis County study area also are included because the issues presented may likely impact future legislation and litigation within the study area. The cases chosen for discussion may be broken up into four main fair housing issues: (1) discriminatory lending practices, (2) occupancy limits and restrictive definitions of “family” which exclude unrelated persons, (3) housing rights based on immigration status, and (4) minimum spacing and density requirements for group homes for persons with disabilities.

Missouri has adopted a parallel version of the federal Fair Housing Act, allowing plaintiffs alleging violation of fair housing rights to seek redress in state or federal court, or by filing a complaint with the Missouri Human Rights Commission. Though the Missouri Human Rights Act (MHRA) (Missouri Revised Statutes Sec. 213.040 et seq.) and the federal FHA are not identical, they are coextensive, and accordingly Missouri courts are guided by both Missouri law and federal law in deciding claims of housing discrimination.

Issue 1: Discriminatory lending practices found in St. Louis County.

- U.S. v. Midwest BankCentre, Civil Action No. 4:11-cv-01086-FRB (E.D. Mo.) (settlement entered June 28, 2011, amended agreement entered April 15, 2013).

In June 2011, the Department of Justice filed suit against Midwest BankCentre, a wholly-owned subsidiary of Midwest BankCentre, Inc., a financial holding company headquartered in St. Louis County, Missouri, with its principal office in St. Louis County. The federal government alleged that BankCentre engaged in a pattern or practice of conduct in violation of the Fair Housing Act and the Equal Credit Opportunity Act by discriminating on the basis of race and color in the provision of residential real estate-related credit in the Missouri portion of the St. Louis MSA (which includes the St. Louis County study area). The lawsuit alleged that Midwest BankCentre had been serving the credit needs of the residents of predominantly white neighborhoods in the MSA while intentionally and unlawfully avoiding serving the credit needs of majority African-American neighborhoods. The bank denied the claims, but to avoid costly litigation agreed to a settlement. The original settlement was filed in conjunction with the DOJ’s complaint in the U.S. District Court for the Eastern District of Missouri. An amended settlement agreement, the “Amended Agreed Order,” was approved by the court and entered April 15, 2013.

The lawsuit originated from information gathered by the Metropolitan St. Louis Equal Housing Opportunities Council and provided to the Department of Justice in 2009, as well as a 2010 referral by the Board of Governors of the Federal Reserve System to the Justice Department's Civil Rights Division.

The remedial plan under the settlement agreement includes the opening of at least one new full-service branch in a majority-black census tract, and the investment of approximately \$1.45 million in majority-black areas of the St. Louis MSA. The settlement requires the Bank to make the following investments: a minimum of \$250,000 in advertising, marketing, and community outreach campaigns; a minimum \$900,000 in a special financing program to increase the amount of credit the bank extends to majority African-American areas in order to aid in the revitalization and stabilization of the housing market; and at least \$300,000 for consumer education and credit repair programs. The Bank also was required to conduct periodic fair lending training for its employees. As part of the settlement, the Bank also agreed to pay \$25,000 to compensate the Metropolitan St. Louis Equal Housing Opportunity Council for the resources that it diverted to this matter

In a press release regarding the settlement, the Assistant Attorney General for the Justice Department's Civil Rights Division stated, "Lending discrimination deprives communities of access to credit and leaves the residents of minority neighborhoods vulnerable to predatory lenders. This type of discrimination is part of the web of intolerable practices that stripped vast amounts of wealth from communities of color in the last decade. We are pleased that Midwest BankCentre has begun working with community groups and agreed to invest and take creative steps to build credit in an area that has been long been neglected by the banking community."

Midwest BankCentre has until June 2016 to meet the requirements of the amended settlement agreement, and remains under the Court's jurisdiction for enforcement of the agreement until then.

- Metropolitan St. Louis Equal Housing Opportunity Council v. First National Bank of St. Louis and Central Bancompany, FHEO Case No. 07-10-0153-8 (Conciliation Agreement approved by HUD Dec. 17, 2010).

In 2010, the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) – a grantee in HUD's Fair Housing Initiatives Program (FHIP) – filed a complaint with HUD alleging illegal redlining against First National Bank of St. Louis and Central Bancompany. EHOC alleged that First National designated its Community Reinvestment Act ("CRA") assessment areas in a manner to exclude areas of high minority concentration, and failed to market products to African Americans or in African American communities. Further, EHOC alleged that First National denied loans to black applicants at a rate five times higher than for white applicants, and charged higher rates based on the race of applicants. The Banks denied wrongdoing, but to avoid costly administrative and judicial litigation agreed to settle the claims. The parties entered a Conciliation Agreement approved by HUD on December 17, 2010.

Under the settlement, EHO received \$100,000 for fair housing and community reinvestment activities, and the Banks agreed to revise the assessment areas to include the entirety of St. Louis County and areas of minority concentration. In addition, First National Bank of St. Louis agreed to invest more than \$2.5 million over four years in minority and low-income communities in the City of St. Louis, north St. Louis County, and St. Clair County, Illinois. This includes opening a new full-service branch in a majority African-American census tract, making Spanish-language services available in all branches, conducting targeted advertising to African-Americans and Hispanics including radio advertising and direct mailings, providing community development loans and investments, subsidizing mortgage loans to residents of majority-minority areas, providing credit counseling and financial literacy training, and requiring yearly fair lending training to its employees.

The agreement governs for four years from the effective date, unless the Bank fails to expend at least \$500,000 in the described Special Financing Program. Then HUD may extend the terms for an additional year.

Issue 2: Occupancy limits and restrictive definitions of “family” that prevent unrelated persons (including unmarried couples with children) from residing together as a single housekeeping unit.

- Loving v. City of Black Jack, Civil Action No. 2106CC-03157 (Circuit Court for the County of St. Louis 2006), Civil Action No. 4:06-cv-01430 (E.D. Mo. 2006) (case removed to federal district court and settlement agreement reached).

In August 2006, an unmarried couple, Olivia Shelltrack and Fondray Loving, represented by the ACLU, filed suit against the City of Black Jack, after being denied an occupancy permit because the local zoning law’s definition of “family” prohibited more than three unrelated people from living together unless related by “blood, marriage or adoption.” At the time, Shelltrack and Fondray had been together for 13 years and had two children together. However, because Loving was not the biological father of Shelltrack’s oldest child, the City denied the family an occupancy permit for the 2,300 sq. ft. home that they had recently purchased. The family faced fines of up to \$500 every week for living in their home without an approved occupancy permit.

The lawsuit alleged violations of substantive due process and equal protection under the Missouri and federal Constitutions, and discrimination on the basis of familial status in violation of the Fair Housing Act. Plaintiffs argued that the City’s refusal to grant an occupancy permit, and subsequent threat of enforcement action, burdens their fundamental rights to control the upbringing of their children and to order their intimate family relationships within a single home, and also burdens the children’s rights to cohabitate with their parents and siblings, without serving any legitimate governmental interest.

On September 29, 2006, the Defendants removed the case to federal district court for the Eastern District of Missouri, citing the multiple disputed issues of federal law. The City also unanimously adopted a new ordinance redefining what constitutes a “family” for zoning and occupancy purposes, and amended its housing code to include the same definition as that now contained in the zoning ordinance.

In February 2007, the city of Black Jack agreed to a settlement, in its words to limit costly litigation and because a change in the zoning code resolved the issue. The City agreed to pay \$28,000 to settle the lawsuit, including \$5,500 each to Shelltrack and Loving, \$1,000 for each of the three children, and attorneys’ fees of \$14,000. The case was subsequently dismissed.

The City’s current definition of “family” still restricts the number of unrelated persons who may reside together to three, but also includes as an exception to that limit: “Two unrelated individuals plus the biological, adopted, or foster children of either such individuals, living together as a single, nonprofit housekeeping unit in a dwelling unit.” (The Zoning Ordinance of the City of Black Jack, Sec. 030(3)(27)(4)).

Issue 3: Prohibiting residential occupancy for persons who cannot provide proof of citizenship or legal residency, i.e. housing rights based on immigration status.

- Reynolds v. City of Valley Park, Civil Action No. 06-CC-3802, 2007 WL 857320 (Mo. Cir. Ct. St. Louis County Mar. 12, 2007); Case No. ED89659 (Mo. Ct. App. 2008); Civil Action No. 4:06CV01487, 2006 WL 3331082 (E.D. Mo. 2006).
- Gray v. City of Park Valley, Civil Action No. 2107CC-01103 (Mo. Cir. Ct. St. Louis Cnty.); Civil Action No. 4:07-cv-00881-ERW, 2008 U.S. Dist. LEXIS 7238 (E.D. Mo. Jan. 31, 2008); No. 08-1681 (8th Cir. 2009).

The Reynolds and Gray line of cases involve complicated procedural histories that began in 2006 when the City of Valley Park enacted ordinance 1708, an anti-immigrant ordinance (known as the Illegal Immigration Relief Act Ordinance) penalizing businesses and landlords for hiring or renting to “undocumented persons.” (The ordinance modeled other anti-immigrant laws being enacted—and challenged—at the time across the country.) On July 17, 2006, a coalition of landlords, along with the Metropolitan St. Louis Equal Housing Opportunity Council, the ACLU, and MALDEF, filed suit in state court seeking a declaration that the ordinance was invalid and seeking to enjoin enforcement of the ordinance (ordinance 1708, later repealed and amended by ordinance 1715). Plaintiffs claimed that the ordinance was unlawful because it violated the Supremacy Clause and the 14th Amendment of the U.S. Constitution, and the Fair Housing Act. The coalition partners also argued the ordinance resulted in racial profiling that was deterring Hispanics and other minorities from living in or doing business in Valley Park.

Defendants removed the case to federal court, and Plaintiffs filed a motion to remand back to state court. The district court found that the controversy was not ripe for adjudication regarding a federal question as there had yet been no action by the local municipality to enforce the ordinance against Plaintiffs. Also, because the Plaintiffs could find relief if a state court found the ordinance invalid under Missouri state law, Plaintiffs' recovery did not necessarily depend on the construction of federal law. Accordingly, the federal district court remanded the action back to state court in an order issued on November 15, 2006. (See Reynolds v. City of Valley Park, 2006 WL 3331082 (E.D. Mo. 2006)).

On March 12, 2007, the state Circuit Court judge found ordinances 1708 and 1715 were in violation of state law in that the fines were for amounts beyond those permitted and that they violated established landlord and tenant laws, and permanently enjoined enforcement of the ordinances. (See Reynolds v. City of Valley Park, 2007 WL 857320 (Mo. Cir. Ct. St. Louis County Mar. 12, 2007)).

However, before the Circuit Court's ruling, Valley Park effectively repealed both of the ordinances at issue in Reynolds and replaced them with ordinance 1721 (involving the "harboring" of illegal/undocumented immigrants in rental units) and ordinance 1722 (involving the employment of unauthorized immigrants). The City appealed the Circuit Court's order, and the Missouri Court of Appeals dismissed the case as moot because the enforcement provisions of the ordinances had been repealed and substituted with new executory provisions in ordinances 1721 and 1722, which the Plaintiffs chose not to challenge by an amendment to their original suit. (See Reynolds v. City of Valley Park, 254 S.W.3d 264, 266 (Mo. Ct. App. 2008)).

On March 14, 2007, Plaintiffs filed suit again in state court, challenging ordinances 1721 and 1722. Gray v. City of Park Valley, Civil Action No. 2107CC-01103 (Mo. Cir. Ct. St. Louis Cnty.) In July 2007, the City repealed ordinance 1721 (the housing ordinance providing for sanctions against landlords for renting housing to illegal/undocumented immigrants), and the parties stipulated to a voluntary dismissal of claims regarding that ordinance. The City then narrowed the employer-related ordinance so that only employers failing to use E-Verify can be sanctioned.

For the remaining claims regarding the employment ordinance (1722), the City again removed the case to federal district court, and this time the district court retained jurisdiction because the new ordinance imposed immediate obligations on Plaintiffs. Generally, ordinance 1722 prohibits all business entities in Valley Park from knowingly employing unauthorized aliens. The ordinance sets out a procedure for lodging complaints against potential violators and requires, among other things, that those business entities that apply for a business license sign an affidavit stating that they do not knowingly employ any person who is an unlawful worker. The U.S. District Court for the Eastern District of Missouri ruled in favor of the City in January 2008. In an appeal raising only procedural and preclusion issues, the Eighth Circuit affirmed in June 2009. (See Gray v. City of Valley Park, 567 F.3d 976 (8th Cir. 2009)).

The following cases involve parties outside the St. Louis County study area, but may likely impact zoning, licensing, and fair housing issues within the study area.

- *Lozano v. Hazleton*, 724 F.3d 297 (3rd Cir. 2013) (cert. denied 134 S. Ct. 1491, March 3, 2014);
- *Villas at Parkside Partners v. City of Farmers Branch*, 726 F.3d 524 (5th Cir. 2013) (cert. denied 134 S. Ct. 1491, March 3, 2014); and
- *Keller v. City of Fremont*, 719 F.3d 931 (8th Cir. 2013) (cert. denied 82 U.S.L.W. 3650, May 5, 2014).

Between 2006 and 2007, the City of Hazleton, PA, passed a series of ordinances (known as the Illegal Immigration Relief Act and the Rental Registration Ordinance) that attempted to regulate the employment of unauthorized workers and the provision of rental housing to persons lacking lawful immigration status within Hazleton. The ordinances would deny business licenses to those who employ undocumented workers, require persons to show proof of legal residency and obtain an occupancy license before renting housing, and fine landlords who rent to undocumented/illegal immigrants. The ACLU and other advocacy groups, representing landlords, business owners, and immigrants, filed suit in federal court against Hazleton to halt enforcement of the ordinances. The district court struck down the ordinances finding they violated due process and were preempted by federal immigration law. On appeal the Third Circuit Court of Appeals affirmed the district court's ruling. *Lozano*, 620 F.3d 170 (3d Cir. 2010) ("Lozano II"), vacated and remanded, 131 S. Ct. 2958, 180 L. Ed. 2d 243 (2011). The U.S. Supreme Court granted the City's petition for a writ of certiorari, vacated the Third Circuit's decision, and remanded for reconsideration in light of the Supreme Court's intervening decision in *Chamber of Commerce v. Whiting*, 131 S. Ct. 1968, 179 L. Ed. 2d 1031 (2011).

The Supreme Court provided important guidance for lower courts' application of the pre-emption doctrine to local zoning and licensing ordinances in *Whiting* and *Arizona v. United States*, 132 S. Ct. 2492, 183 L. Ed. 2d 351 (2012). The Court upheld Arizona's efforts to regulate the employment of unauthorized aliens through a business licensing law in *Whiting*, but largely rejected Arizona's efforts to enact its own immigration policies, both within and outside of the employment context, in *Arizona*.

In light of those cases, the Third Circuit reconsidered its prior ruling upholding the District Court's permanent injunction, and again found, with some difference in reasoning, that federal law preempts the employment and housing provisions of the Hazleton ordinances. *Lozano v. Hazleton*, 724 F.3d 297 (3rd Cir. 2013) (cert. denied 134 S. Ct. 1491, March 3, 2014).

Like the Third Circuit, the Fifth Circuit underscored that a similar ordinance adopted by Farmers Branch, Texas, which criminalized the leasing of property to undocumented/illegal immigrants and required proof of citizenship/ lawful residency, directly conflicted with the federal immigration regulatory scheme.

The Dallas suburb of Farmers Branch enacted multiple housing ordinances after different versions were enjoined and ultimately stricken by Texas state court and federal district court. The first, Ordinance 2892, required that "submission of evidence of citizenship or eligible immigration status" be presented before a lease or rental agreement could be entered. Ordinance 2892 was enjoined by a Texas state court. Thirteen days after Ordinance 2892 was enjoined, Farmers Branch adopted Ordinance 2903 which would require similar rental and lease requirements as 2892, but which would go to the Farmers Branch voters for adoption. In May 2007, before 2903 went into effect, the U.S. District Court enjoined its enforcement as preempted by federal law as an invalid regulation of immigration. The District Court further found 2903 void for vagueness as a violation of the Fourteenth Amendment.

Nonetheless, based on frustration at the perceived lack of federal enforcement of immigration law, Farmers Branch then enacted a third ordinance, Ordinance 2952, to prevent "persons not lawfully in the United States" from renting housing in the city. Farmers Branch Ordinance 2952 would have required any person over the age of eighteen to apply for a residential occupancy license, based on which the city building inspector would verify the immigration status of the tenant. Despite the city's argument that the ordinance was not a regulation of immigration because it employed existing federal law to determine whether an individual was lawfully present, the U.S. District Court for the Northern District of Texas held that the ordinance "is an invalid regulation of immigration because it uses those classifications for purposes not authorized or contemplated by federal law." The Fifth Circuit upheld the district court's ruling, finding that the City's ordinance was preempted by federal law because it directly conflicted with federal immigration law by setting forth criminal offenses and by providing for state judicial review of a non-citizen's lawful or unlawful presence, which was a power reserved exclusively to the federal government. Villas at Parkside Partners v. City of Farmers Branch, 726 F.3d 524 (5th Cir. 2013) (cert. denied 134 S. Ct. 1491, March 3, 2014).

In contrast, the St. Louis-based Eighth Circuit Court of Appeals upheld a similar anti-immigrant housing law passed in Fremont, Nebraska. In 2010, Fremont adopted an ordinance requiring renters to first obtain an occupancy permit from the city after proving his/her lawful presence in the U.S. In 2012, a federal district court temporarily prevented the provision from going into effect after finding that denying housing permits to undocumented/illegal immigrants is discriminatory and interferes with federal immigration law. Keller v. City of Fremont, 853 F. Supp. 2d 959, 2012 U.S. Dist. LEXIS 20908 (D. Neb. 2012). However, on June 28, 2013, a three-judge panel of the Eighth Circuit Court of Appeals disagreed with the lower court and upheld the ordinance, finding that the rental provision is not preempted by federal law because it does not require local officials to determine whether an individual is removable from the U.S. but only mandates that city officials defer to the federal government's determination of whether a prospective renter is unlawfully present. The Court found validity in the ordinance because the ordinance applied to all residents, not just noncitizens. The Eighth Circuit court's ruling gave the city of Fremont the green light to begin enforcing the law on its residents. Keller v. City of Fremont, 719 F.3d 931 (8th Cir. 2013) (cert. denied 82 U.S.L.W. 3650, May 5, 2014).

In a dissenting opinion by Eighth Circuit Judge Bright, he argued that the ordinance is unconstitutional because it conflicts with the federal government's exclusive immigration authority to decide who may and may not reside in the U.S. According to Judge Bright, the law "prevents undocumented persons from renting in Fremont, which is tantamount to preventing them from living in the city at all." The dissenting opinion also pointed to the fact that all the other Circuit Courts that have ruled on this issue have found similar rental prohibitions to be in conflict with the federal system for removal of undocumented immigrants.

In March 2014, the U.S. Supreme Court declined to grant certiorari to hear cases on the rental ordinances in Farmers Branch, TX, and Hazleton, PA. And again, on May 5, 2014, the Supreme Court denied cert to hear an appeal of the Eighth Circuit's decision to uphold a similar ordinance passed in Fremont, Nebraska. Missouri is in the Eighth Circuit. The Supreme Court's decision to reject the Farmers Branch, Hazleton, and Fremont cases means that there is an unresolved conflict among the federal circuits with differing case law and precedent ruling on the issue in different parts of the country.

Given that the Eighth Circuit upheld the proof of legal residency enforcement ordinance and the Supreme Court refused to review that decision, other municipalities within the Eighth Circuit may be encouraged to adopt similar ordinances prohibiting landlords from renting to immigrants whose legal residency cannot be verified, and requiring renters to obtain an occupancy permit and show proof of citizenship or legal residency before renting housing within the jurisdiction. On the other hand, the divisiveness of the issue and the cost of likely litigation may be enough to discourage the passing of such laws, at least until the legality of such ordinances is finally settled by the Supreme Court.

Issue 4: Minimum spacing requirements for group homes for persons with disabilities.

- United States v. City of St. Peters, Civil Action No. 4:13-cv-01493-CEJ (E.D. Mo. 2013).

On August 1, 2013, the U.S. Justice Department filed suit against the City of St. Peters in St. Charles County, Missouri, to challenge a zoning ordinance that imposed spacing requirements on group homes for persons with disabilities in residential districts. Until then, St. Peters' zoning code stated, "No group home shall be located within two thousand five hundred (2,500) feet of another group home. The exterior appearance of the home and property shall be in reasonable conformance with the general neighborhood standards. Group homes shall be eleemosynary or not-for-profit in nature." (St. Peters City Code §§ 405.130(B)(3), 405.140(B)(3), 405.150(B)(3), and 405.160(B)(3) (governing residential districts R-1, R-1(A), R-2, R-3(A), and R-3(B), respectively.) The City imposed the 2,500 foot spacing requirements on housing for people with disabilities and not on housing for people without disabilities, making the provision facially discriminatory.

After the City denied, without justification, a variance request by Community Living, Inc. to operate a group home for four women with intellectual disabilities, a legal guardian for a resident of the group home filed a complaint with HUD. HUD referred the complaint to the Justice Department, which conducted an investigation. The federal government brought suit to challenge the City's alleged discriminatory and segregative zoning provisions and policies under the federal Fair Housing Act and Title II of the Americans with Disabilities Act. The complaint also alleged that the City refused to make reasonable accommodations to the rules, policies, practices or services that were necessary to afford the residents an opportunity to use and enjoy their home.

Under the settlement, St. Peters agreed to pay \$80,000; replace the city ordinance that imposes a 2,500-foot spacing requirement on group homes for persons with disabilities with an ordinance that is approved by the United States; adopt a written policy by which persons may request reasonable accommodations or modifications on the basis of disability from the city's zoning and land use requirements; prepare detailed written findings whenever the city denies any type of request for zoning or land use relating to a dwelling occupied by, or designated or intended for occupancy by, persons with disabilities; and provide training on the FHA and ADA to City officials and employees involved in land use and zoning decisions.

In a press release regarding the settlement, Bryan Greene, U.S. Department of Housing and Urban Development's (HUD) Acting Assistant Secretary for Fair Housing and Equal Opportunity, stated, "Zoning ordinances that unjustifiably keep group homes out of neighborhoods violate the Fair Housing Act. HUD and the Department of Justice will continue to work together to ensure that everyone, including persons with disabilities, has access to the kind of housing that meets their needs."

The City's definition of single family dwelling has been amended to expressly include group homes for persons with disabilities. The City's zoning regulations regarding group homes still include a spacing requirement, but reduced to 500 feet, and now expressly state that the intent of the spacing requirement is "to promote deinstitutionalization and dispersal of group homes." (See City of St. Peters Code Sec. 405.355 et seq.) In compliance with the settlement agreement, the City also adopted a "Reasonable Accommodation Policy and Procedure" ordinance, which gives the director of planning, or his designee, the authority to grant or deny reasonable accommodation requests without the applicant having to submit to the variance or conditional use permit or other public hearing process. (See Sec. 225.100 et seq.)

Due to settlement, the court never had the opportunity to adjudicate the merits of the government's claims against St. Peters' spacing requirement. However, similar regulations can be found in local zoning ordinances within the St. Louis County study area, and may expose these municipalities to costly litigation where residents are denied housing choice because of their disability.

Hate Crime Data

As defined by the Hate Crime Statistics Act of 1990 (28 U.S.C. § 534), hate crimes are “crimes that manifest evidence of prejudice based on race, gender or gender identity, religion, disability, sexual orientation, or ethnicity.” Any traditional crime, such as murder, arson, or vandalism can be classified as a hate crime if it is motivated by a bias against the perceived race, religion, disability, ethnic origin or sexual orientation of the victim. Because these protected classes significantly overlap those classes protected under the Fair Housing Act, an examination of data on hate crimes is conducted as part of this Analysis of Impediments. The Federal Bureau of Investigation (FBI) maintains a Uniform Crime Reporting Program, under which more than 18,000 federal, state, and local law enforcement agencies voluntarily report incidences of crime in their jurisdictions for nationwide statistical assessment and monitoring purposes. Hate crime statistics have been monitored and published annually under the FBI’s Uniform Crime Reporting Program since 1992.¹³²

For this analysis, hate crime statistics for the most recently available five-year period (2008-2012) were reviewed for trends that could indicate pervasive discriminatory attitudes in particular jurisdictions within St. Louis County (excluding the City of St. Louis) and the City of O’Fallon. As shown in the table below, the relevant jurisdictions reported a total of 38 incidences of a hate crime during the survey years. The majority of hate crimes reported were motivated by race (27 incidences), accounting for 71% of all such reports. St. Louis County reported the most incidences of hate crimes among the reporting jurisdictions. Data from 2012, the most recent survey period, shows that race motivated hate crime has declined since its peak in 2009, from 10 incidences in 2009 to 4 incidences in 2012.

The U.S. Department of Justice reports that hate crimes put cities and towns at-risk of serious social and economic consequences, including an increased strain on police, fire, and medical personnel resources, and over time may result in lower business and residential property values, which in turn may lower tax revenues. Moreover, the prevalence of hate crimes and how the community responds in terms of prosecuting (or rehabilitating) offenders and serving victims, may have an impact on fair housing choice. Persons belonging to a protected class that has been the target of recent hate crimes may feel unwelcome or even threatened and vulnerable in certain communities, and will therefore choose to live elsewhere if possible.

The Community Relations Service (CRS), an arm of the DOJ, is a specialized Federal conciliation service available to State and local officials to help resolve and prevent racial and ethnic conflict, violence and civil disorder. The CRS may be contacted about implementing certain “best practices” to prevent hate crimes and restore harmony in the community. These strategies may include adopting a hate crime ordinance, creating a coalition of local community groups and stakeholders

¹³² FBI.gov. <http://www.fbi.gov/about-us/cjis/ucr/hate-crime/2011/resources/about-hate-crime-statistics>

to collaborate on constructive initiatives, establishing a multi-jurisdictional or regional task force among police departments, and funding education and awareness programs.

Reported Hate Crime Data for Years 2008-2012							
Jurisdiction	Year	Number of incidents per bias motivation					Total
		Race	Religion	Sexual Orientation	Ethnicity	Disability	
St. Louis County	2008				1		1
	2009	3					3
	2010	3	1	1			5
	2011	6	1				7
	2012	2					2
Bridgeton	2010	1					1
Chesterfield	2009	1					1
Clayton	2009	4					4
Creve Coeur	2012		2				2
Des Peres	2011				1		1
Edmundson	2012	1					1
Manchester	2008		1				1
Maplewood	2008			1			1
	2009	1					1
Maryland Heights	2009		1				1
O'Fallon	2009	1			1		2
	2010	1					1
	2011	1					1
Overland	2012	1					1
Riverview	2010	1					1
Town & Country	2010	1					1
Woodson Terrace	2011	1					1

Source: <http://www.fbi.gov/stats-services/crimestats>

Impediments & Recommendations

In the *Fair Housing Planning Guide*, HUD defines an impediment to fair housing choice as an action, omission or decision based on race, color, religion, sex, disability, familial status, or national origin that restricts or has the effect of restricting housing choices or the availability of housing choices.¹³³ Throughout this assessment various community issues have surfaced, both positive and negative. Some of these issues represent general community needs (e.g. the quality of jobs available) and, while valid, do not restrict or have the effect of restricting housing choice and thus do not constitute impediments. Even some affordable housing-related issues (e.g. low credit scores leading to denial of apartment rental applications) fall short of classification as impediments to fair housing choice.

For this analysis, qualitative data received in the form of input from interviews and community meetings was combined with quantitative data from the U.S. Census and from the many other sources consulted. In some cases, the quantitative data collected from a single source was clear and compelling enough on its own to indicate the existence of an impediment. In other cases, and particularly with the use of qualitative data, the cumulative effect of a comment or criticism repeated many times over in many different settings was sufficient to indicate a barrier. Sometimes a weak or inconclusive correlation of quantitative data from one source could be supported by public comments and input or data from another source to constitute an impediment.

In this section, the 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 barrier. It should be noted that these barriers are largely systemic and will require effort from both private sector and public sector actors to correct.

Impediment #1: Affordable Housing Options Concentrated in Areas of Low Opportunity (Applicable to St. Louis County & Florissant)

In St. Louis County, affordable housing options, both subsidized and non-subsidized, tend to be concentrated in urban areas of low opportunity,¹³⁴ particularly in the North County region which includes the City of Florissant. This impediment is similar to the OneSTL FHEA's finding that the "(l)ocation of affordable housing perpetuates segregation and limits access to opportunity." In North County and in the Lemay area, affordable housing exists, sometimes with housing quality issues, but the ability of area residents to improve economically is challenging. This report's analysis of access to areas of opportunity revealed that areas with low opportunity in terms of poverty, school proficiency, and labor market engagement are overwhelmingly concentrated in North County communities. Public input reinforced this finding, with residents commenting that suburban

¹³³ U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide: Volume 1 (Chapter 2: Preparing for Fair Housing Planning, Page 2-17)*. March 1996.

¹³⁴ This Analysis of Impediments looks at neighborhood opportunity on six dimensions as defined by HUD, including poverty, school proficiency, labor market engagement, access to jobs, access to transit, and exposure to environmental health hazards. The County may choose to use these factors or develop an alternate definition of opportunity based on similar measures of community health.

areas outside St. Louis County tended to have higher performing schools, lower crime rates, and better housing conditions. Residents of the study area interviewed for this report further cited a general shortage of Section 8 units available in the County outside the North County area. Still others named the low quality and deteriorating condition of existing affordable housing units as problems. Taken together, the relative concentration of housing options affordable to people of low- and moderate-income (who are disproportionately minorities) in high poverty areas without access to quality schools and with low rates of labor market participation is an inherent restriction on housing choice.

Recommendations

Local governments in the study area should partner with the private sector to create more mixed income housing using available public resources such as the HOME Program, Low Income Housing Tax Credits, and state or local housings bonds. Equally important could be the creation of a Mixed Income Housing Investment Program, capitalized by lenders, which would provide incentive financing to developers who construct sustainable mixed income housing in these regions of the study area.

For affordable housing developments receiving public subsidy or incentives from a local government entity (e.g. St. Louis County, Florissant, or other municipalities) the source of public funds should prioritize projects located in high opportunity areas of the county, especially those with transit access. To the extent these local government entities can influence the award of tax credits by the Missouri Housing Development Commission to developers for new affordable housing projects either through letters of endorsement or the investment of CDBG funds, such measures should be reserved for those projects in high opportunity areas.

The efforts of groups like Beyond Housing, which focuses on comprehensive community investments, stand as an example of how improving institutions that generate economic activity should accompany affordable housing rehabilitation and preservation. If an area and its residents do not have access to adequate income, rehabilitated housing will become subject to deferred maintenance and the unit may again contribute to poorer housing quality in that area.

Other existing organizations such as SLEHCRA (St. Louis Equal Housing and Community Reinvestment Alliance) are already working to improve opportunity in North County areas and their work should be supported by St. Louis County and Florissant. New bank branches have opened in low opportunity North County areas (Ferguson, Overland, and Pagedale) with record numbers of deposits in their first weeks. Positive results like these should be promoted to encourage further investment in these communities. In areas like North County that are economically distressed, the types of employment opportunities available can perpetuate the cycle of unemployment and underemployment. Public and private sector job training programs should be crafted that are designed to raise the skill levels of area residents to match employment opportunities with better pay in that area.

Expansion of the Section 8 program to include more units accepting the vouchers throughout St. Louis County would increase affordable housing options in areas of greater opportunity and is consistent with one of the recommendations of the 2012 St. Louis County Housing Study. The County should encourage rental property owners in high opportunity areas to accept Section 8 vouchers through an education program that describes how the vouchers work and includes testimonials from other local landlords who have had success with the Section 8 program. St. Louis County and the City of Florissant should also explore the option of offering discounted occupancy permits and/or expedited inspections for Section 8 landlords, and work with other jurisdictions in the county who may be willing to offer similar incentives. The St. Louis County Housing Study also recommended the creation of Voucher Counseling Centers where voucher recipients could be assisted in locating housing units in locations that might not be concentrated in high poverty areas.

Impediment #2: Imbalance Between Job Centers and Affordable Housing Options (O'Fallon)

Compared to other communities in the study area, in O'Fallon, there is relatively little available affordable housing. The rapid growth of O'Fallon and St. Charles County has occurred at the same time that North St. Louis County has declined in population and economic prosperity. Much of the economic expansion in O'Fallon has been as a result of the construction of higher cost housing and the retail infrastructure that supports households with higher incomes. As a result, the City contains many service-sector jobs, but the lack of affordable housing makes it difficult for people holding these jobs to live in proximity to them. Because there isn't adequate affordable housing for the City's workforce, the housing options for lower-wage workers tend to be limited.

Recommendations:

The construction of new affordable and/or mixed-income housing would accomplish the goal of increased economic opportunity and greater standard housing available for a more diverse population. A Housing Market Analysis should be prepared for O'Fallon to provide reliable information to guide public policymakers and private investors in determining whether and where affordable and/or mixed-income housing projects are feasible, what types of public and private financing would be needed, and a potential timeline for development.

Density bonuses, fee waivers or other incentives for development of workforce or mixed-income housing could spur investment and development. Finally, education for city council members and other local leaders on the benefits of providing a range of housing options, including housing for the local workforce could result in additional support for these initiatives.

Impediment #3: NIMBY/Prejudiced Attitudes (St. Louis County, Florissant, O'Fallon)

Segregation between Black and White residents of the study area is high (dissimilarity index value of 0.71) and remained unchanged between 2000 and 2010. Whereas studies of other communities outside the St. Louis region tend to reveal declining levels of racial and ethnic segregation, the issue in this study area appears to be persistent. Public input and comments received through the Fair Housing Survey conducted in conjunction with this AI reveal that some residents of the study area

hold strong “Not In My Back Yard” (NIMBY) sentiments as well as attitudes prejudiced against people of low-income, those residing in subsidized housing, and racial/ethnic minorities.

Recommendations:

Education and awareness is imperative to alleviating NIMBYism and prejudiced attitudes. Segregatory living patterns and prejudiced personal beliefs and attitudes create negative impacts on social conditions and discourse and can take many years to overcome. In the near term, education and awareness of the value of diversity and integration is especially important (this was also recommendation 1.1 in the OneSTL FHEA). The local governments within the study area should continue to support and work with organizations (such as InvestSTL) dedicated to promoting diversity throughout metro St. Louis and St. Louis County.

Collaborating with the assigned HUD Office of Fair Housing and Equal Opportunity and/or with local fair housing advocacy organizations, the entitlement communities should develop an appropriate diversity and sensitivity awareness 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.

A separate campaign to educate local leaders and elected officials in St. Louis County jurisdictions and in O’Fallon regarding the economic benefits of diversity should be developed, and they should be encouraged to participate in countywide or regional initiatives. The campaign should identify and publicize local examples of success, such as that of the Brentwood School District which has taken a deliberate approach of embracing diversity.

Impediment #4: Unreasonably Restrictive Definitions of “Family” and Related Occupancy Permitting Requirements (St. Louis County & Florissant & O’Fallon)

In the sample of municipal zoning codes reviewed in conjunction with this AI, many were found to have restrictive definitions of “family,” unreasonably restricting the number of unrelated people permitted to live together in a housing unit. For example, in 2006, the City of Black Jack settled a suit (Loving v. City of Black Jack) that arose out of the denial of an occupancy permit for a household that, under the city’s code, exceeded the limit of three unrelated members.

The impact of these restrictive definitions found in local zoning codes is amplified by occupancy permitting requirements. In Florissant and in many other communities in the study area, a permit must be obtained from the municipal government for the number of persons occupying a housing unit. Changes in the household composition (i.e. the number of occupants) require a new permit. In O’Fallon, an occupancy permit and inspection is required upon turnover of rental housing units, although the permit is not based on the number of people occupying a housing unit. Additionally, some municipalities require proof of legal residency in order to obtain an occupancy permit. Through these various occupancy permitting requirements, communities are able to control, by

approval or denial of a permit, who may live in their jurisdiction, expressly limiting fair housing choice. It should be noted that St. Louis County's zoning code affects only unincorporated areas of the county and that the county government has no control over municipal ordinances.

Recommendations:

The entitlement communities should explore the opportunity to partner with a local university for a review of occupancy permit requirements, family definitions, and zoning ordinances (including regulations regarding group homes and residential treatment centers) in all St. Louis County jurisdictions and in O'Fallon. This work could be led by a professor with research support from public policy or planning graduate students. When the review is complete, the results should be presented to a panel of community representatives, representing various stakeholder groups (including planners, zoning officials, fair housing advocates, and advocates for immigrants) who should then advocate ordinance revisions where appropriate.

Impediment #5: Limited Housing Options for People with Disabilities (St. Louis County, Florissant, O'Fallon)

In both the sample set of municipal zoning codes reviewed as part of this AI and in the review of fair housing-related lawsuits for jurisdictions in the study area, ordinance and policy provisions often restricted housing choice for people with disabilities. In half of the zoning codes reviewed, a spacing requirement was imposed between group homes for people with disabilities. Such requirements, when applied to housing for people with disabilities but not to housing types occupied by others, has potential to violate the Fair Housing Act. Of the zoning codes reviewed none provided a clear and objective process by which persons with disabilities may request a reasonable accommodation to zoning, land use, and other regulatory requirements. Further, the codes in the sample set also restricted residential treatment facilities only to non-residential zones. Under federal law, it is discriminatory to deny an individual or entity the right to site a treatment program in a residential zone because it will serve individuals with alcohol or other drug problems. Particularly in Florissant and St. Louis County, the age of the housing stock also may limit the availability of housing units accessible to people with disabilities, as older housing units are less likely to have been built to modern accessibility or visitability standards.

Recommendations:

It is recommended that St. Louis County, Florissant, and O'Fallon meet with disability advocates to better understand types and locations of units missing from the current accessible housing stock and to identify best practices for or examples of design of accessible units. For housing developments with public funding, prioritize those that meet these identified needs. For other private/market-rate projects, educate developers about and encourage them to consider these needs.

Density bonuses or other incentives for projects built according to universal design principles such that all units are handicap accessible would open up new housing options and increase housing choice. For residential developments competing for public funding, those that offer universal design, or that otherwise exceed FHA minimum accessibility requirements (either in number of accessible units provided and/or in the design of these units) should be prioritized.

Regarding reasonable accommodation standards, model ordinances are available that have been approved by HUD or the DOJ as part of fair housing settlement or conciliation agreements. These models should be compiled by a regional organization and advocated to local municipalities.

Impediment #6: Private Sector Lending Discrimination (St. Louis County & Florissant)

Since 2005, two significant lawsuits have been filed against banks operating in or headquartered in St. Louis County alleging discrimination on the basis of race and color in lending. Specifically, banks in these two cases were said to have intentionally declined to provide loans to African Americans or within predominantly African American communities. In both of these lawsuits, the banks involved denied wrongdoing and settled the suits to avoid litigation. However, the similarities between the two cases, the specific racial group denied loans, and the unwillingness to make loans within specific communities raises important issues of fair housing choice.

Recommendations:

The Metropolitan St. Louis Equal Housing Opportunity Council (EHOC) and SLEHCRA have been working to pressure lenders to stop disinvestment in areas with majority-minority populations and reinvest in these regions. In fact, EHOC was involved in both of the cited lawsuits, as a plaintiff in one and an informant in the other. This investigative and advocacy work should be supported by the entitlement communities. Additionally, these or other local organizations should be funded and charged with fair housing education and testing efforts as well as periodic review and analysis of lending data provided by banks and other lenders under the Home Mortgage Disclosure Act. Publicly praise or otherwise recognize financial institutions with a record of supporting fair housing initiatives. For County and City financial business, give banks that have not supported fair housing goals a low priority.

Impediment #7: Difficulties with Fair Housing Compliance from Small-Scale Landlords (St. Louis County & Florissant)

Some stakeholders interviewed in the course of this analysis noted that acts of housing discrimination are more prevalent in the study area from small-scale landlords who own or manage very limited numbers of housing units. Survey results, while quite limited, provide some anecdotal support for this perspective: of the four respondents who reported having faced housing discrimination, all of them named a landlord or property manager as the perpetrator of the discrimination.

Recommendations:

As recommended in the 2012 St. Louis County Housing Study, more outreach and training is needed to educate rental property owners and managers on the requirements of the Fair Housing Act, the definitions of protected classes, discriminatory practices, and potential consequences for non-compliance. The St. Louis Apartment Association (SLAA) offers education opportunities and could play a coordinating role in the outreach and education of small-scale landlords in the study area. Support for continued testing by EHOC or a similar organization is also recommended, with capacity for subsequent legal action if necessary.

Impediment #8: Need for Alternative Transportation Options (O'Fallon)

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 reverse is true as well. A lack of transportation options limits the selection of housing to neighborhoods within walking or biking distance of employers and disproportionately affects low-income, disabled, and elderly residents.

There is no system of public transportation serving O'Fallon or greater St. Charles County. Public input received in the process of developing this AI repeatedly cited the lack of transportation alternatives as an important factor limiting the housing choices of people either living or working in O'Fallon. It was not uncommon for participants to share the view that, for people without a personal vehicle, living in O'Fallon simply was not a viable choice.

Recommendations:

The City's Public Assistance Department should routinely review transportation planning efforts carried out by other City 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.

It is recommended that the City convene a group of service providers, Planning & Development staff, business leaders, and other local stakeholders to identify top transit needs (e.g. connections to the City of St. Louis, to St. Louis County, to job centers in general, or simply transit within O'Fallon, etc.), level of need, and locations of transit dependent populations in O'Fallon. If improved connectivity with St. Louis is identified as a need, the City is advised to meet with a Metro representative to determine what role it may play.

Given the size of O'Fallon, a full-scale public transit system is unlikely to be feasible, however there are intermediate options (such as demand-response systems, vanpools, and transit management organizations) that could provide needed connections for the City's residents and workforce. A

survey of similarly-sized suburban cities should be conducted to identify successful transit programs in comparable jurisdictions.

Conclusion

Through this Analysis of Impediments to Fair Housing Choice, several barriers have been identified that restrict the housing choice available to residents of St. Louis County, Florissant, and O'Fallon. These barriers may prevent residents 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. Louis County, the City of Florissant, and the City of O'Fallon will work diligently toward achieving fair housing choice for their residents using the recommendations provided here to address the identified impediments. However, it should be noted that these impediments are largely systemic and will require effort from both private sector and public sector actors to correct. Each jurisdiction has an important role to play but cannot on its own bring about the change necessary to remove these impediments to fair housing choice.

The recommendations proposed in this document address impediments relative to concentrations of affordable housing, an imbalance between job centers and housing options, restrictive definitions of “family” and restrictive occupancy permitting requirements, lending discrimination, discrimination by small-scale landlords, limited accessible housing options, and NIMBYism. Implementation of the recommendations can assist St. Louis County, Florissant, and O'Fallon in achieving the reality of an open and inclusive region that truly embraces fair housing choice for all its residents.