



# 2020 Analysis of Impediments to Fair Housing Choice Report

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*December 21, 2020*

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Prepared by  
*Central Florida Regional Planning Council*

Prepared for  
*City of Lakeland, Florida*



*Assessment  
of  
Fair Housing  
Choice*

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# Introduction

## *Affirmatively Furthering Fair Housing*

Title VIII of the Civil Rights Act of 1968, as amended (the “Fair Housing Act”) prohibits discrimination in the sale or rental of housing on the basis of race, color, religion, sex, or national origin. The Fair Housing Act was amended in 1988 to extend the protection against discrimination to include individuals with disabilities and familial status. The Assessment of Fair Housing (AFH) is an analysis of fair housing data, fair housing issues and contributing factors, and an identification of fair housing priorities and goals to affirmatively further fair housing as required under the Federal Fair Housing Act.

As a local government receiving Community Development Block Grants (CDBG) and Federal HOME Investment Partnerships grants, the City of Lakeland, Florida is required to certify to the U.S. Department of Housing and Urban Development (HUD) that the City will affirmatively further fair housing as part of the 5-year comprehensive housing affordability strategy. This strategy identifies needs for affordable and supportive housing for the upcoming 5 years as part of the Consolidated Plan for years 2021-2025. The AFH is part of this certification process. Local government responsibilities as part of the certification include:

- Analyze and eliminate housing discrimination within the jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promote housing that is physically accessible to all persons to include those persons with disabilities; and
- Foster compliance with nondiscrimination provisions of the Fair Housing Act.

Effective September 8, 2020, HUD released the Preserving Community and Neighborhood Choice rule, as an improved approach to clarifying and simplifying existing fair housing obligations for jurisdictions receiving federal grants from HUD. The rule states that jurisdictions should analyze their fair housing landscape and set locally determined fair housing priorities and goals through the AFH. While housing issues are complex and multi-faceted, and affect all residents of the City, the purpose of this AFH is to focus specifically on fair housing and related needs and actions. The AFH examines whether housing issues are experienced differently on the basis of characteristics protected by the Fair Housing Act, which was crafted to address segregation and to prohibit discrimination on the basis of race, ethnicity, national origin, religion, sex, familial status, and/or disability. HUD defines “fair housing choice” as:

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

The 2020 City of Lakeland AFH includes a review of demographic and socio economic conditions and current growth management policies. Feedback from affordable housing providers was collected regarding the changing housing market and the impacts on area homebuyers and renters. Public engagement and input were facilitated through an online Fair Housing Choice Survey and a virtual community workshop. In prior years, a series of public meetings were held; however, during 2020 this was not possible due to the COVID-19 pandemic.

## Definitions

Definitions guiding the AFH are provided below.

**Affirmatively Further Fair Housing:** Compliance 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.”

**Fair Housing Choice:** The ability of persons of similar income levels to have available to them the same housing regardless of race, color, religion, sex, national origin, familial status, or handicap.

**Impediments to Fair Housing Choice:** As adapted from the HUD *Fair Housing Planning Guide*, impediments to fair housing choice include:

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

**Protected Classes:** The following definition of Federally protected classes is used in this document:

- 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:** HUD defines as "affordable" housing that costs no more than 30 percent of a household's total monthly gross income. For rental housing, the 30 percent amount would be inclusive of any tenant-paid utility costs. For homeowners, the 30 percent amount would include the mortgage payment, property taxes, homeowner’s insurance, and any homeowners’ association fees.

## Data Sources

The data sources guiding the AFH are provided below.

**Decennial Census Data:** Data collected by the Decennial Census for 2010 and 2000. The results are used by the U.S. Census Bureau to create datasets from the 2010 and 2000 Census Summary File.

- 2010 and 2000 Census Summary File: This dataset contains what is known as “100 percent data,” meaning it contains the data collected for every household that participated in the Census and is not based on representative population. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income.

**American Community Survey:** The ACS is an ongoing statistical survey that samples a small percentage of the U.S. population every year providing communities with more current population and housing data throughout the 10 years between censuses.

**Home Mortgage Disclosure Act (HMDA) Data:** The HMDA requires financial institutions to maintain, report, and publicly disclose loan-level information about mortgages. These data help indicate whether lenders are serving the housing needs of their communities; provide public officials information to assist in decision and policymaking; and show lending patterns that may be discriminatory. The public data are modified to protect applicant and borrower privacy. The HMDA was originally enacted by Congress in 1975 and is implemented by Regulation C.

**University of Florida’s Shimberg Center for Housing Studies:** Research by the Shimberg Center for Housing Studies documents housing conditions and affordable housing needs in Florida’s counties, cities, and neighborhoods; preserving Florida’s affordable rental housing; linking affordable housing with land use and transportation decisions through GIS modeling; and supporting the development of energy efficient and healthy homes. Th Center also produces the Florida Housing Data Clearinghouse, providing public access to data on housing needs and supply for Florida’s counties and cities.

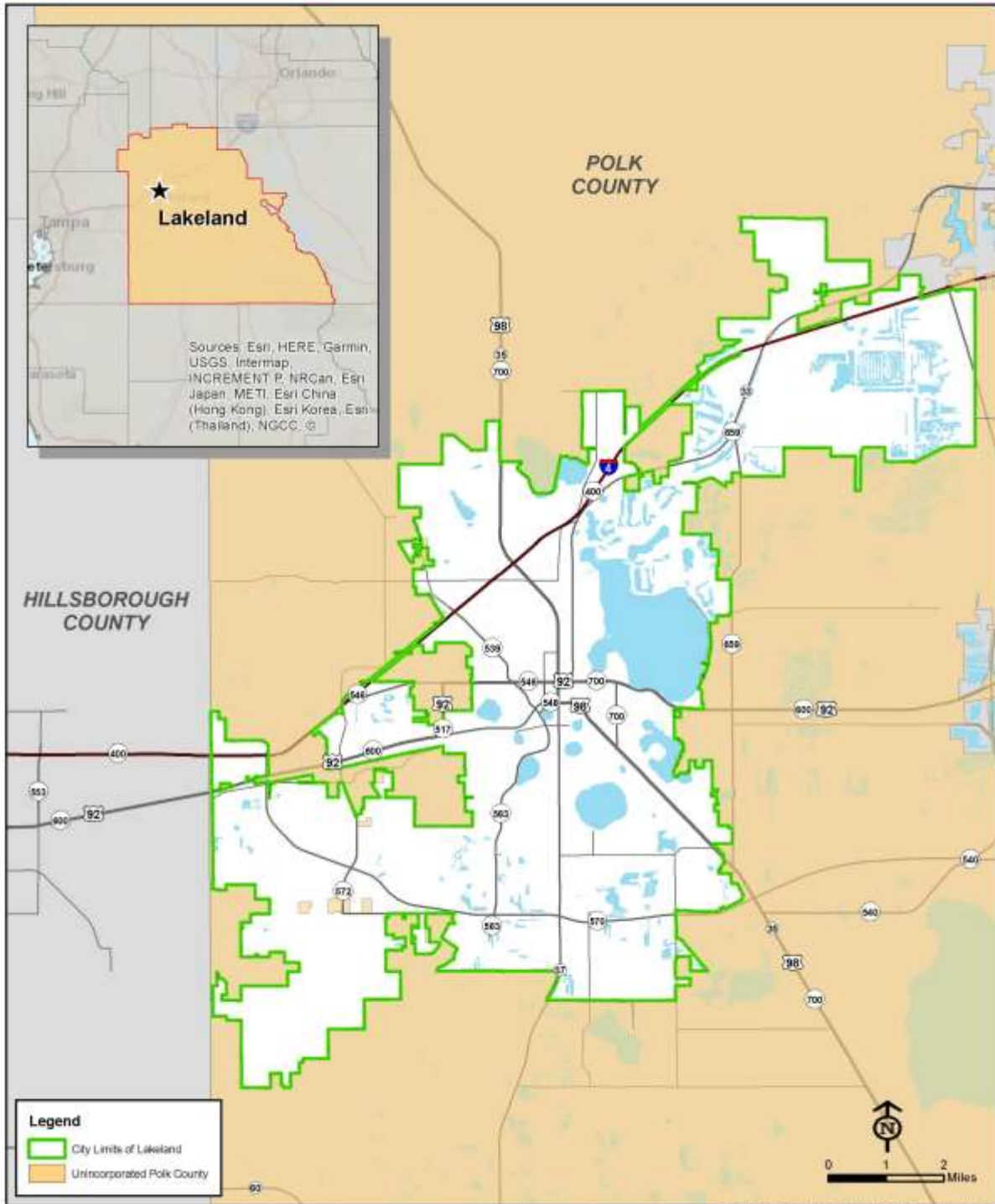
# Existing Conditions Analysis

## *Demographic and Socio Economic Profile*

The City of Lakeland 2020 Assessment of Fair Housing (AFH) was prepared, in part, through the review of data from the U.S. Census Bureau, the Home Mortgage Disclosure Act (HMDA), the University of Florida Shimberg Center for Housing Studies, the Central Florida Development Council, and the U.S. Housing and Urban Development (HUD). These data provide the basis for the existing conditions analysis.

The City of Lakeland is located between Tampa and Orlando along Interstate 4. Lakeland is the largest city in Polk County, which is the fourth largest county in the State comprising 1,797 square miles of land and over 2,000 square miles including water bodies. Lakeland offers many resources and services for an exceptional quality of life such as its firm commitment to downtown redevelopment, historic preservation, cultural amenities, and a business-friendly environment. Lakeland is the home to Publix Supermarkets, which is the City's largest employer with over 6,500 employees. The County has a growing sector of major health care providers in Lakeland Regional Health, Bay Care Healthcare, and Watson Clinic, LLP. Lakeland has four colleges and universities, and is also home to Florida's newest public university, Florida Polytechnic University. The City is also the spring training home to Major League Baseball's Detroit Tigers.

# City of Lakeland LOCATION MAP





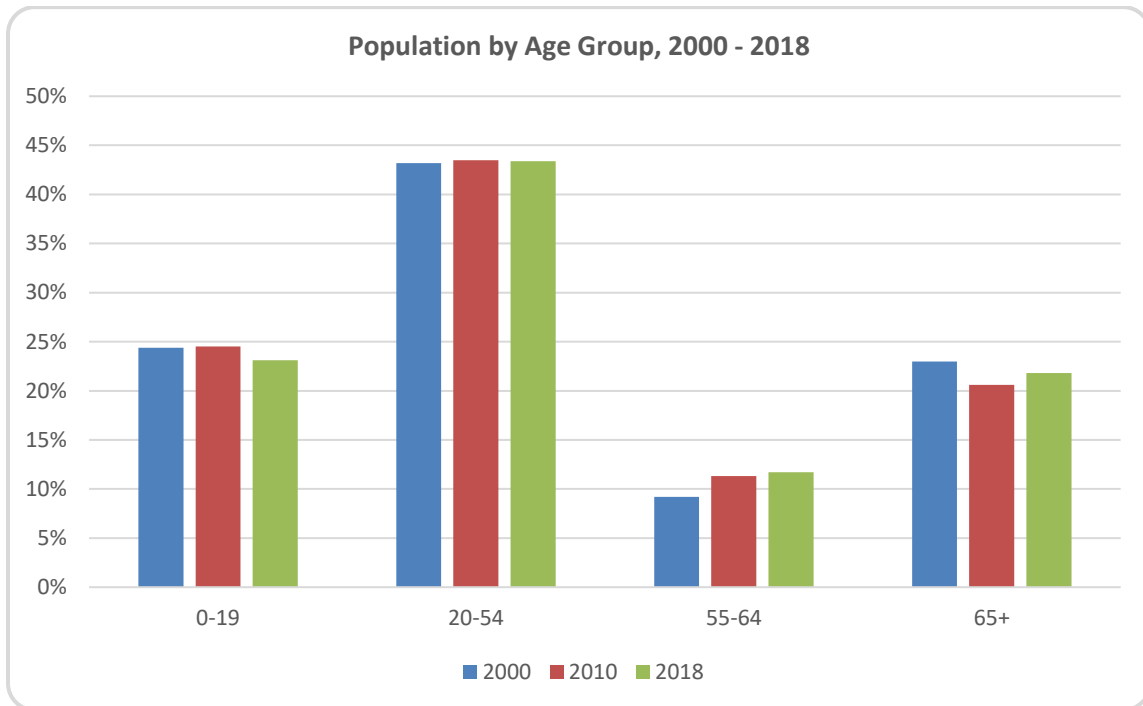




## 2000-2018

Age	2000 Population	2000 % of Total	2010 Population	2010 % of Total	2018 Population	2018 % of Total
0-19	19,141	24.4%	23,709	24.5%	24,413	23.1%
20-54	33,920	43.2%	42,088	43.5%	45,974	43.4%
55-64	7,345	9.2%	10,891	11.3%	12,477	11.7%
65+	18,046	23.0%	19,935	20.6%	23,094	21.8%
<b>Total</b>	<b>78,452</b>	<b>100.0%</b>	<b>96,623</b>	<b>100.0%</b>	<b>105,958</b>	<b>100.0%</b>

Source: American Community Survey 2018 5-Year Estimate Table DP-05



Source: American Community Survey 2018 5-Year Estimate Table DP-05

### City Population Projections by Age Group

The table below includes the Shimberg Center for Housing Studies population projections through 2040. The 45 to 49 age group, the 70 to 74 age group, and the 75 and older age group will increase their percent of

total population by 2040 while all other age groups experience a decrease in percent of total population by 2040. The 75 and older age group will experience the largest increase in share of population, from 11.6 percent in 2020 to 15.5 percent in 2040.

### Population Age Projections through 2040

Age	2020 Population	2020 % of Total	2030 Population	2030 % of Total	2040 Population	2040 % of Total
0-4	6,197	5.7%	7,058	5.7%	7,202	5.4%
5-9	6,281	5.7%	7,085	5.7%	7,352	5.5%
10-14	5,860	5.4%	5,960	4.8%	6,482	4.9%
15-19	6,920	6.3%	7,688	6.2%	8,263	6.2%
20-24	8,647	7.9%	9,726	7.8%	9,388	7.1%
25-29	7,757	7.1%	8,302	6.7%	8,731	6.6%
30-34	6,249	5.7%	7,009	5.7%	7,478	5.6%
35-39	5,807	5.3%	6,996	5.6%	7,129	5.4%
40-44	5,527	5.1%	6,285	5.1%	6,772	5.1%
45-49	5,642	5.2%	6,226	5.0%	7,204	5.4%
50-54	5,960	5.4%	6,317	5.1%	6,921	5.2%
55-59	6,474	5.9%	6,504	5.2%	6,917	5.2%
60-64	6,760	6.2%	7,013	5.7%	7,164	5.4%
65-69	6,353	5.8%	7,618	6.1%	7,480	5.6%
70-74	6,282	5.7%	7,674	6.2%	7,945	6.0%
75+	12,647	11.6%	16,449	13.3%	20,691	15.5%
<b>Total</b>	<b>109,363</b>		<b>123,910</b>		<b>133,119</b>	

Source: University of Florida Shimberg Center for Housing Studies

### Households with Children

Approximately 23.9 percent of households in the City of Lakeland have children compared to 29.6 percent in Polk County, 27.2 percent in Florida, and 31.4 percent in the nation. Lakeland has a lower percentage of households with children that are led by married couples than the County, State, and the nation. Lakeland has a higher percentage of households with children that are led by a male householder, with no wife present than Florida and the nation but a lower percentage than the County. Lakeland has a lower percentage of households with children that are led by a female householder, with no husband present than the other three areas.

### Households with One or More Persons Under 18

Status	Lakeland	Polk County	Florida	United States
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<b>Total Households</b>	<b>23.9%</b>	29.6%	27.2%	31.4%
<b>Married couple family household</b>	<b>32.5%</b>	34.8%	35.7%	42.3%
<b>Male householder, no wife present, family household</b>	<b>57.1%</b>	60.6%	51.8%	55.6%
<b>Female householder, no husband present, family household</b>	<b>59.4%</b>	63.7%	60.2%	66.3%
<b>Nonfamily household</b>	<b>0.4%</b>	0.9%	0.7%	0.8%

**Source:** American Community Survey 2018 5-Year Survey Table S-1101

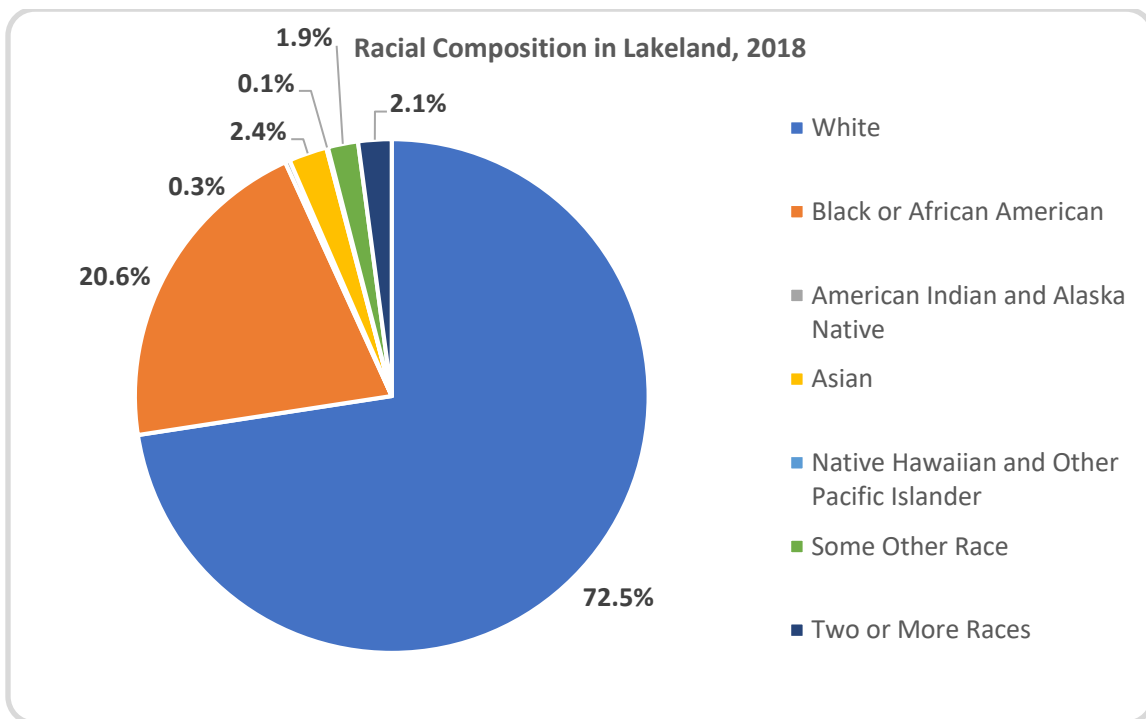
### **Population by Race and Hispanic or Latino Ethnicity**

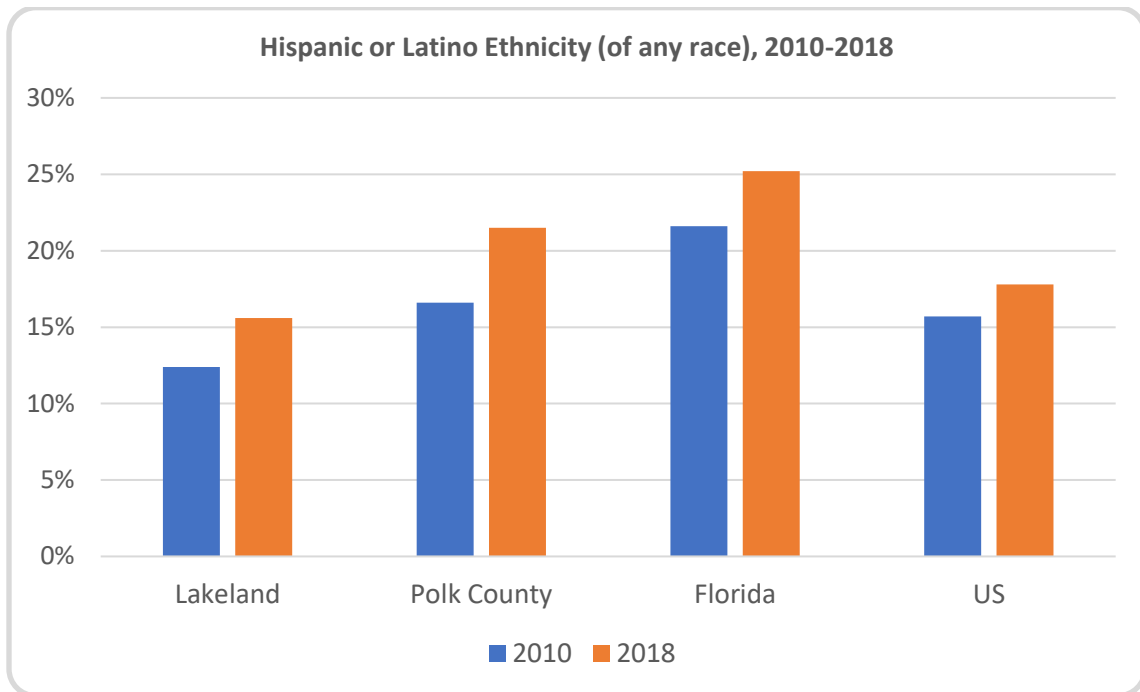
The 2018 5-Year American Community Survey indicates 97.9 percent of the City’s population identifies as one race versus 97.5 percent in Polk County, 97.4 percent in Florida, and 96.8 percent in the nation. Of those who identify as one race, approximately 72.5 percent identify as white, which is similar to the nation but lower than Polk County and Florida. Approximately 20.6 percent of the population in Lakeland identifies as black or African American, which is nearly double the percentage of the nation. Approximately 2.4 percent of Lakeland’s population identifies as Asian, which is less than half of the nation. As is the case with Polk County, Florida, and the nation, the percentage of people in Lakeland identifying as one race decreased between 2010 and 2018. The percentage of the population that identifies as Black or African American and the percentage of the population that identifies as two or more races increased between 2010 and 2018 for all four entities. The percentage of population that identifies as Hispanic or Latino ethnicity (including any race) increased for all four geographic areas. Lakeland experienced a larger percentage increase than the nation, but less of an increase than the State or Polk County.

### **Population Identification by Race and Hispanic or Latino Ethnicity**

Race	Lakeland 2010	Lakeland 2018	Polk County 2010	Polk County 2018	Florida 2010	Florida 2018	U.S. 2010	U.S. 2018
One Race	98.3%	97.9%	98.1%	97.5%	98.0%	97.4%	97.6%	96.8%
White	71.7%	72.5%	77.4%	77.8%	76.3%	75.4%	74.0%	72.7%
Black or African American	19.9%	20.6%	14.3%	15.2%	15.7%	16.1%	12.5%	12.7%
American Indian and Alaska Native	0.3%	0.3%	0.4%	0.3%	0.3%	0.3%	0.8%	0.8%
Asian	1.8%	2.4%	1.6%	1.7%	2.4%	2.7%	4.7%	5.4%
Native Hawaiian and Other Pacific Islander	0.0%	0.1%	0.1%	0.0%	0.1%	0.1%	0.2%	0.2%
Some Other Race	4.5%	1.9%	4.3%	2.4%	3.4%	2.8%	5.5%	4.9%
Two or More Races	1.7%	2.1%	1.9%	2.5%	2.0%	2.6%	2.4%	3.2%
Hispanic or Latino Ethnicity (includes any race)	12.4%	15.6%	16.6%	21.5%	21.6%	25.2%	15.7%	17.8%

Source: American Community Survey, 2018 5-Year Survey Table DP-05





**Sources:**

- American Community Survey 2018 5-Year Table DP-05
- University of Florida Shimberg Center for Housing Studies Population and Household Projections

**Distribution and Concentration of Minority Populations**

Throughout City, the African American population is represented in greatest proportions near the center of Lakeland (refer to map on next page).

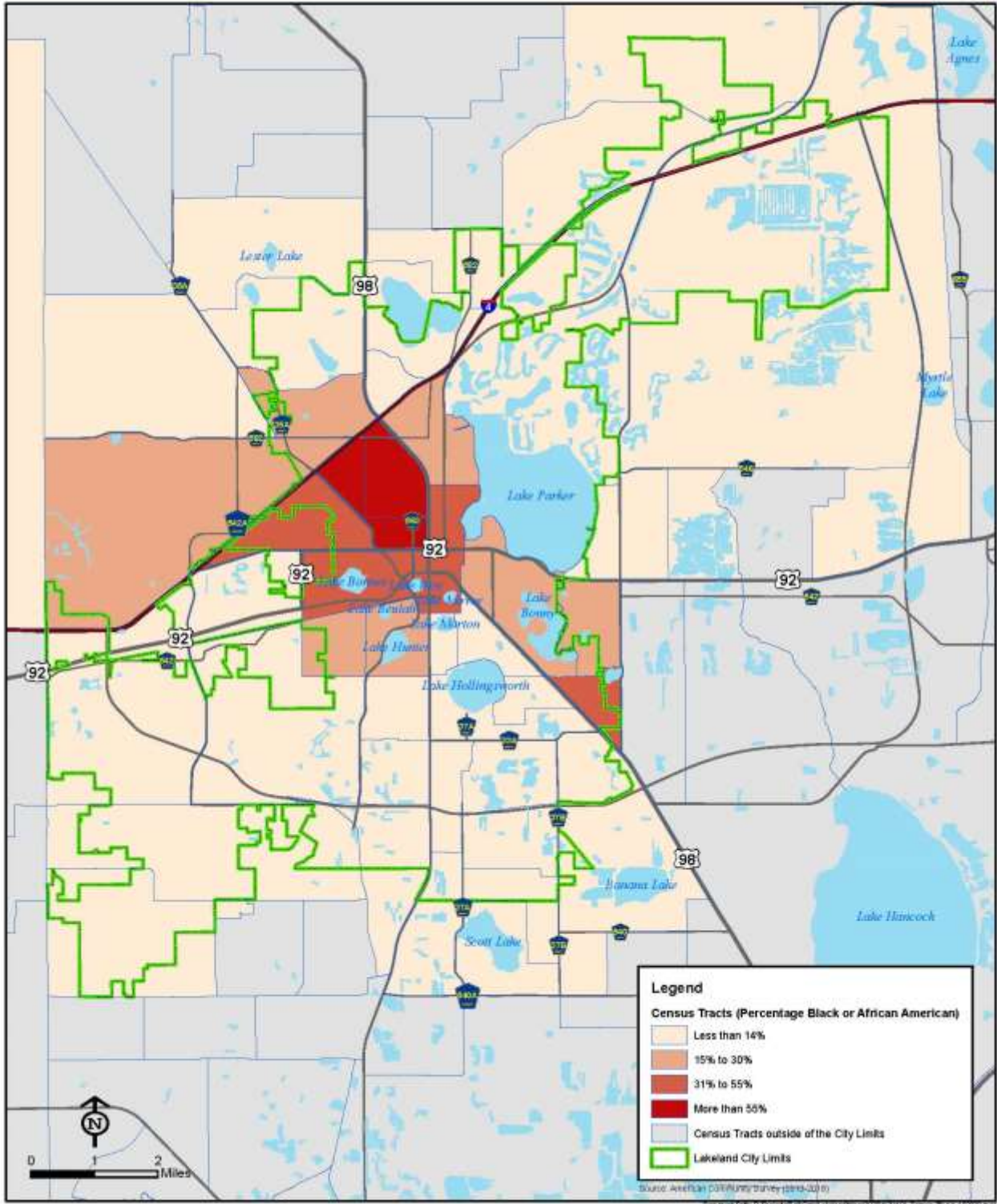
The distribution of the Latino (Hispanic) population is most densely concentrated from the center extending out to the southwest portions of the City as indicated on the map (refer to map on next page).

**Minority Concentration Areas**

Areas of minority concentration are defined as block groups whose percentages of a specific minority group are 10 percent or greater than that of the jurisdiction as a whole. The African American population and Hispanic population represent 20.6 percent and 15.6 percent, respectively, of the total population in City.

The following maps display the year 2018 concentrations, by block group, of African Americans and Hispanics of the population by 2010 Census tracts.

## Percent of Black or African American Population by Census Tracts







## Limited English-Speaking Households

According to the U.S. Census Bureau, a "limited English speaking household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulty with English. Approximately, 3.4 percent of all households in Lakeland are limited English-speaking households. Of the households that are limited English-speaking, approximately 28.2 percent speak Asian and Pacific Island languages and approximately 23.3 percent speak Spanish.

### Limited English-Speaking Households

Language	Lakeland	Polk County	Florida	United States
<b>Percent of All Households</b>	<b>3.4%</b>	3.7%	6.9%	4.4%
<b>Spanish</b>	<b>23.3%</b>	18.5%	26.5%	21.9%
<b>Other Indo-European languages</b>	<b>11.5%</b>	14.2%	17.3%	15.2%
<b>Asian and Pacific Island languages</b>	<b>28.2%</b>	17.6%	19.8%	25.3%
<b>Other languages</b>	<b>0.0%</b>	7.7%	13.1%	16.9%

Source: American Community Survey 2018 5-Year Survey Table S-1602

## Veterans

Lakeland and Polk County have approximately 9.3 percent of civilian population 18 years and older that are veterans. This percentage is higher than Florida at approximately 8.9 percent, or the nation at approximately 7.5 percent. More than 90 percent of the veteran population in all four geographic areas is male. Approximately 76.1 percent of Lakeland's veteran population is over 55 years old, compared to 76.4 percent for Polk County, 71.5 percent for Florida, and 67.5 percent for the nation. Lakeland's veterans have a higher mixture of races than the nation, but a smaller mixture of races than Polk County and Florida. The percentage of veterans in Polk County that identify as Hispanic or Latino (of any race) is higher than the nation and lower than Florida. Approximately 68.3 percent of the veterans in Lakeland participate in the labor force. The median income for Lakeland veterans is higher than the median income for veterans in Polk County and lower than the median income for veterans in Florida and the nation. Lakeland has a higher percentage of veterans with a disability, approximately 34.8 percent, than Polk County with 32.6 percent, Florida with 29.6 percent, and the nation with 29.0 percent.

### Veterans - Sex

Civilian Population Ages 18 to 64	Lakeland	Polk	Florida	United States
Male	91.6%	91.9%	91.1%	91.4%
Female	8.4%	8.1%	8.9%	8.6%

Source: American Community Survey 2018 5-Year Estimate Table S-2101

### Veterans - Age

Civilian Population Ages 18 to 64	Lakeland	Polk	Florida	United States
18 to 34 years	4.7%	5.8%	7.3%	8.8%
35 to 54 years	19.2%	17.7%	21.3%	23.6%
55 to 64 years	17.3%	17.9%	17.6%	18.0%
65 to 74 years	25.3%	29.8%	26.2%	26.2%
75 years and over	33.5%	28.7%	27.7%	23.3%

Source: American Community Survey 2018 5-Year Estimate Table S-2101

### Veterans – Race and Ethnicity

Civilian Population Ages 18 to 64	Lakeland	Polk	Florida	United States
White alone	85.0%	87.9%	85.5%	82.5%
Black or African American alone	10.8%	8.6%	10.7%	11.7%
American Indian and Alaska Native alone	1.3%	0.5%	0.4%	0.8%
Asian alone	0.2%	0.8%	0.9%	1.6%
Native Hawaiian and Other Pacific Islander alone	0.7%	0.1%	0.1%	0.2%
Some other race alone	0.5%	0.9%	1.0%	1.3%
Two or more races	1.5%	1.2%	1.5%	2.0%
Hispanic or Latino (of any race)	5.3%	7.8%	8.3%	6.7%
White alone, not Hispanic or Latino	80.8%	81.8%	78.7%	77.7%

Source: American Community Survey 2018 5-Year Estimate Table S-2101

### Veterans – Median Income and Poverty Status

Civilian Population Ages 18 to 64	Lakeland	Polk	Florida	United States
Labor Force participation rate	68.3%	70.7%	73.8%	76.3%
Median Income in the Past 12 Months (2018 Inflation-Adjusted Dollars)	\$35,790	\$34,523	\$38,630	\$40,842
Income in the Past 12 Months Below Poverty Level	9.3%	8.2%	7.2%	6.9%

Source: American Community Survey 2018 5-Year Estimate Table S-2101

### Veterans – Disability Status

Civilian Population Ages 18 to 64	Lakeland	Polk	Florida	United States
With any Disability	34.8%	32.6%	29.6%	29.0%
Without a Disability	65.2%	67.4%	70.4%	71.0%

Source: American Community Survey 2018 5-Year Estimate Table S-2101

### Households Headed by Persons Age 65 and Older

According to the 2018 American Community Survey, approximately 16.1 percent of Lakeland’s households include persons aged 65 years and older that live alone. This is higher than the 12.5 percent in Polk County, 12.8 percent in Florida, and 10.7 percent in the nation.

### Disability

According to the 2018 American Community Survey, 16.0 percent of the City’s population, 15.4 percent of the County’s population, 13.4 percent of Florida’s population, and 12.6 percent of the nation’s total population report having a disability. Federal law defines a person with a disability as: any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having an impairment. Approximately 76.6 percent of Lakeland’s population with a disability are over 65 years old compared to 72.4 percent in Polk County, 68.9 percent in Florida, and 74.2 percent in the nation. In the City, 9.6 percent of the population report having an ambulatory difficulty, 7.7 percent have an independent living difficulty, 5.2 percent have a cognitive difficulty, 4.7 percent have a hearing difficulty, 3.9 percent have a vision difficulty, and 3.6 percent have a self-care difficulty. Like the City, the most common disability type in Polk County, Florida, and the nation is ambulatory disability at 8.8 percent, 7.6 percent, and 7.0 percent, respectively.

### Disability by Age Category

Age Category	Lakeland	Polk County	Florida	U.S.
Under 5 years	1.0%	0.9%	0.7%	0.7%
5 to 17 years	5.7%	7.5%	5.7%	5.4%
18 to 34 years	4.9%	7.2%	5.9%	6.2%
35 to 64 years	16.9%	15.7%	12.3%	12.8%
65 to 74 years	27.8%	25.9%	22.7%	25.1%
75 years and over	48.8%	46.5%	46.2%	49.1%

Source: American Community Survey 2018 5-Year Estimate Table S-1810

### Disability Characteristics

Type of Disability	Lakeland	Polk County	Florida	U.S.
With a Hearing Difficulty	4.7%	4.3%	3.8%	3.6%
With a Vision Difficulty	3.9%	3.3%	2.5%	2.3%
With a Cognitive Difficulty	5.2%	5.9%	5.2%	5.1%
With an Ambulatory Difficulty	9.6%	8.8%	7.6%	7.0%
With a Self-Care Difficulty	3.6%	3.2%	2.8%	2.7%
With an Independent Living Difficulty	7.7%	7.3%	6.0%	5.8%

Source: American Community Survey 2018 5-Year Estimate Table S-1810

A household is considered cost burdened if it pays more than 30 percent of its gross monthly income for housing. The table below shows the cost burden by household income based on percentage of area median income (AMI) for households with a disability. This information is provided at the county-level.

**Polk County**  
**Severely Cost Burdened Households, with Low Income, with Disability**

Housing Cost Burden	Household Income	Tenure	Household Count
<b>30% or Less Cost Burden</b>	0-50% AMI	Renter	1,869
<b>30% or Less Cost Burden</b>	0-50% AMI	Owner	3,664
<b>30% or Less Cost Burden</b>	>50% AMI	Renter	6,669
<b>30% or Less Cost Burden</b>	>50% AMI	Owner	34,067
<b>Greater than 30% Cost Burden</b>	0-50% AMI	Renter	7,221
<b>Greater than 30% Cost Burden</b>	0-50% AMI	Owner	6,998
<b>Greater than 30% Cost Burden</b>	>50% AMI	Renter	3,930
<b>Greater than 30% Cost Burden</b>	>50% AMI	Owner	5,312

**Source:** Shimberg Center for Affordable Housing

## Economic Profile

### Labor Force

Lakeland has a slightly larger percentage of the population 16 years and over in the labor force than Polk County, but a smaller percentage than Florida and the nation. Lakeland's percent of the population 16 years and over in the civilian labor force that are unemployed is slightly lower than Polk County, the state, and the nation.

#### Population by Labor Force

Labor Force	Lakeland	Polk	Florida	United States
<b>Total Population 16 years and older in the Labor Force</b>	<b>55.0%</b>	54.9%	58.7%	63.3%
<b>Total Population 16 years and older in the Civilian Labor Force</b>	<b>54.9%</b>	54.9%	58.3%	62.9%
<b>Employed</b>	<b>51.4%</b>	51.1%	54.7%	59.3%
<b>Unemployed</b>	<b>3.5%</b>	3.8%	3.7%	3.7%

Source: American Community Survey 2018 5-Year Estimate Table DP-03

Lakeland has a lower percentage of workers 16 years and over that commute to work via car, truck, or van than Polk County but a higher percentage than the State or nation. The percentage of workers that commute via public transportation or by walking is higher than Polk County but lower than the rate for the State or the nation. The percentage of persons who work from home is higher in Lakeland than in Polk County but lower than in the State or the nation.

#### Workers 16 Years and Over Commuting to Work

Community to Work	Lakeland	Polk	Florida	United States
<b>Car, truck, or van -- drove alone</b>	<b>80.0%</b>	82.5%	79.4%	76.4%
<b>Car, truck, or van -- carpooled</b>	<b>10.7%</b>	10.0%	9.2%	9.1%
<b>Public transportation (excluding taxicab)</b>	<b>0.8%</b>	0.5%	1.9%	5.0%
<b>Walked</b>	<b>1.7%</b>	1.0%	1.4%	2.7%
<b>Other means</b>	<b>2.0%</b>	1.7%	2.2%	1.8%
<b>Worked at home</b>	<b>4.8%</b>	4.2%	5.8%	4.9%

Source: American Community Survey 2018 5-Year Estimate Table DP-03

The largest percentage of the population is in the management, business, science, and arts occupations followed by the sales and office occupations. The natural resources, construction, and maintenance occupations make up the smallest percentage of the occupations by sector.

### Occupations by Sector for Civilian Population Over 16 Years Old

Sector	Lakeland	Polk	Florida	United States
<b>Management, business, science, and arts occupations</b>	<b>34.1%</b>	30.4%	35.1%	37.9%
<b>Service occupations</b>	<b>16.8%</b>	20.0%	20.1%	17.9%
<b>Sales and office occupations</b>	<b>25.9%</b>	23.8%	25.0%	22.1%
<b>Natural resources, construction, and maintenance occupations</b>	<b>8.4%</b>	10.9%	9.3%	8.9%
<b>Production, transportation, and material moving occupations</b>	<b>14.8%</b>	14.9%	10.4%	13.3%

**Source:** American Community Survey 2018 5-Year Estimate Table DP-03

Lakeland is home to Publix Super Markets which is one of the largest employers in the area. Other major employers include GEICO and Rooms to Go headquarters. During the past several years, large companies such as Amazon and O’Reilly Automotive have opened warehouses. Health care services is also a major employer and include a large hospital, several medical clinics, and a growing number of free-standing urgent care centers.

Lakeland’s economy is shifting, and the needs of the business community are changing. The City’s workforce is increasingly private sector driven, with rapid growth in certain business sectors, such as warehouse/distribution. Lakeland is seeing rapid growth in both technology jobs requiring advanced skills, as well as low-skilled/low-wage service sector jobs. Many businesses in the area need to be able to attract top talent to fill advanced positions, while also needing to fill more entry-level positions with employees who are technically competent and job-ready.

As in many communities around the nation, people living in poverty along with a high unemployment rate, exist in Lakeland. The Census American Community Survey (2014-2018) estimates 17.0 percent of Lakeland’s population living below the poverty level. This exceeds Polk County’s poverty rate of 16.8 percent and the state’s poverty rate of 14.8 percent.



**Major Employers in Lakeland and Polk County by Number of Employed  
Year 2019**

<b>Top Employers</b>	<b>Number of Employees</b>
Polk County School Board	<b>13,235</b>
Publix Super Market	<b>12,500</b>
Lakeland Regional Health	<b>5,575</b>
Walmart	<b>4,250</b>
GEICO	<b>3,700</b>
City of Lakeland	<b>2,800</b>
Winter Haven Hospital	<b>2,200</b>
Polk County Government	<b>1,864</b>
Watson Clinic	<b>1,857</b>
Polk County Sheriff's Office	<b>1,751</b>
Advent Health	<b>1,550</b>
LEGOLAND, Florida	<b>1,500</b>
Mosaic	<b>1,353</b>

**Sources:**

- American Community Survey 2018 5-Year Table DP-03
- CFDC Research

**Household Income**

The 2018 5-Year American Community Survey lists the median household income in the City of Lakeland as \$44,313, which is lower than the Polk County, the State, and the nation. Approximately 84.0 percent of the households have income and benefits under \$100,000 compared to 83.1 percent for Polk County, 77.3 percent for the State, and 72.1 percent for the nation.

The 2010 Census found 14.7 percent of all the people in Lakeland were living in poverty versus 15.2 percent in Polk County and 13.8 percent for Florida and the US. The percentage of persons living below the poverty level have increased for the City, County, Florida, and the nation. The 2018 5-Year American Community Survey estimates 17.0 percent of Lakeland's population is living below the poverty level. This exceeds the Polk County's poverty rate of 16.6 percent, the State's poverty rate of 14.8 percent, and the nation's poverty rate of 14.1 percent.

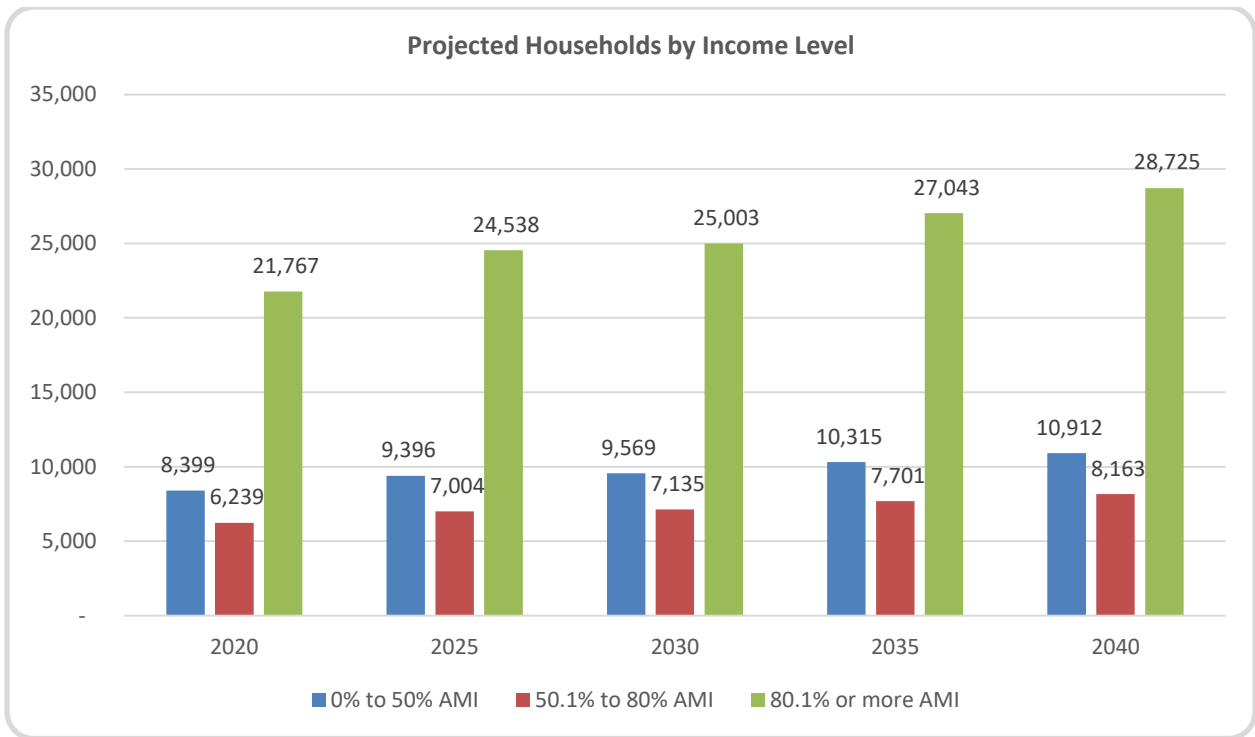
### Income and Benefits for Households (In 2018 Inflation-Adjusted Dollars)

Income and Benefits	Lakeland	Polk	Florida	United States
Less than \$10,000	7.3%	6.7%	6.8%	6.3%
\$10,000 to \$14,999	6.0%	5.1%	4.7%	4.6%
\$15,000 to \$24,999	12.8%	11.4%	10.5%	9.3%
\$25,000 to \$34,999	12.4%	11.6%	10.7%	9.3%
\$35,000 to \$49,999	16.4%	16.7%	14.3%	12.6%
\$50,000 to \$74,999	18.4%	19.7%	18.4%	17.5%
\$75,000 to \$99,999	10.7%	11.9%	11.9%	12.5%
\$100,000 to \$149,999	9.4%	10.8%	12.5%	14.6%
\$150,000 to \$199,999	3.3%	3.3%	4.8%	6.3%
\$200,000 or more	3.2%	2.8%	5.4%	7.0%
<b>Median Household Income</b>	<b>\$44,313</b>	<b>\$48,500</b>	<b>\$53,267</b>	<b>\$60,293</b>

Source: American Community Survey 2018 5-Year Estimate Table DP-03

According to ziprecruiter.com, the 2018 Average Annual Wage in Lakeland is \$57,933. The area median income (AMI) is the midpoint of a region’s income distribution, meaning that half of households in a region earn more than the median and half earn less than the median. A household's income is calculated by its gross income, which is the total income received before taxes and other payroll deductions. In addition to calculating AMI, HUD defines and calculates different levels of AMI for geographic areas across the country by household size. Households earning less than 80 percent of the AMI are considered low-income households, households earning less than 50 percent of the AMI are considered to be very low-income, and households earning less than 30 percent of AMI are considered to be extremely low-income households. These income levels set relative to AMI identify households that may be eligible for certain housing assistance programs administered through HUD (however, the number of tiers used, and percentage of AMI used for qualification varies by each housing program).

The Shimberg Center for Affordable Housing projects that by 2040 the City of Lakeland will have 10,912 very-low income households, 8,163 low-income households, and 28,725 households with incomes greater than 80.1 percent of the area median. The incomes greater than 80.1 percent of the area median category experience the largest percent change with 32.0 percent from 2020 to 2040. The low-income group is projected to increase by 30.8 percent and the very low income group is projected to increase by approximately 29.9 percent.



Source: Shimberg Center for Affordable Housing Studies

### Cost Burdened Households

A household is considered cost burdened if it pays more than 30 percent of its gross monthly income for housing. A household is considered severely cost burdened if it pays 50 percent or more of its gross monthly income for housing. An examination of housing cost burden is important as cost-burdened households may have difficulty affording other necessities such as food, childcare, health care, and transportation. The cost burden calculation for housing costs for a homeowner includes mortgage payments, property taxes, property insurance, homeowner association fees (if any) and utilities. Housing costs for a renter includes rental payments and utilities.

The table below shows the cost burden by household income based on percentage of area median income (AMI). Approximately 43.0 percent of households that make less than 30 percent of the AMI pay more than 50 percent of their household income for housing and approximately 48.0 percent of the households that make less than 30 percent of the area median income pay more than 30 percent of their household income for housing. For households that rent, those numbers increase to 42.3 percent and 45.3 percent respectively.

**Lakeland Cost Burden by Income  
2020 Estimate**

<b>Household Income</b>	<b>30 Percent or less</b>	<b>30.1-50 Percent</b>	<b>More than 50 Percent</b>
<b>All Households</b>			
30% AMI or less	<b>1.5%</b>	<b>5.0%</b>	<b>43.0%</b>
30.01-50% AMI	<b>4.8%</b>	<b>20.9%</b>	<b>37.5%</b>
50.01-80% AMI	<b>12.5%</b>	<b>40.0%</b>	<b>14.1%</b>
80.01-100% AMI	<b>9.9%</b>	<b>18.5%</b>	<b>2.0%</b>
Greater than 100% AMI	<b>71.4%</b>	<b>15.5%</b>	<b>3.4%</b>
<b>Owner Occupied Households</b>			
30% AMI or less	<b>0.8%</b>	<b>8.1%</b>	<b>44.8%</b>
30.01-50% AMI	<b>5.4%</b>	<b>28.5%</b>	<b>25.2%</b>
50.01-80% AMI	<b>13.1%</b>	<b>26.5%</b>	<b>20.4%</b>
80.01-100% AMI	<b>7.9%</b>	<b>15.7%</b>	<b>4.0%</b>
Greater than 100% AMI	<b>72.8%</b>	<b>21.3%</b>	<b>5.6%</b>
<b>Renter Occupied Households</b>			
30% AMI or less	<b>2.8%</b>	<b>3.0%</b>	<b>42.3%</b>
30.01-50% AMI	<b>3.8%</b>	<b>15.9%</b>	<b>42.5%</b>
50.01-80% AMI	<b>11.2%</b>	<b>49.1%</b>	<b>11.5%</b>
80.01-100% AMI	<b>13.6%</b>	<b>20.3%</b>	<b>1.2%</b>

**Source:** Shimberg Center for Housing Studies, Population and Household Projections

The Shimberg Center for Housing Studies estimates that 4,694 owner occupied households and 8,744 renter occupied households will spend more than 30 percent of their income on housing in all of Lakeland in 2020.

### **Poverty Status**

According to the American Community Survey, the percentage of the Lakeland population below the Federal Poverty Level was higher each year than Polk County, the State of Florida, and the nation percentage. The percent below poverty level for each jurisdiction is lower in 2018 than it was in 2012.

### Population Below Poverty Level, 2012 – 2018

Percent below Poverty Level	Lakeland	Polk	Florida	United States
2012	17.5%	17.5%	15.6%	14.9%
2013	19.2%	18.2%	16.3%	15.4%
2014	19.3%	18.5%	16.7%	15.6%
2015	19.2%	18.3%	16.5%	15.5%
2016	18.1%	17.7%	16.1%	15.1%
2017	17.9%	17.3%	15.5%	14.6%
2018	17.0%	16.6%	14.8%	14.1%

Source: American Community Survey, 2012 - 2018 5-Year Surveys, Table S-1701

### Unemployment Rate

The unemployment rate is generally used to gauge the overall productive capacity or overall health of the economy under consideration. The unemployment rate declines during periods of economic prosperity and rises during periods of economic hardship or recession. A ten-year comparison of the average annual unemployment rate is presented in the table below. Polk County’s unemployment rate is consistently higher than the unemployment rate in Florida and the nation.

### Unemployment Rate, 2009 – 2019

Year	Polk	Florida	United States
2009	11.3%	10.4%	9.3%
2010	12.1%	11.1%	9.6%
2011	11.3%	10.0%	8.9%
2012	9.7%	8.5%	8.1%
2013	8.3%	7.3%	7.4%
2014	7.2%	6.3%	6.2%
2015	6.3%	5.4%	5.3%
2016	5.6%	4.9%	4.9%
2017	4.8%	4.2%	4.4%
2018	4.1%	3.6%	3.9%
2019	3.7%	3.1%	3.7%

Source: FloridaJobs.org

## Foreclosure Rate

The Polk County Clerk’s office reports that there have been 1,664 foreclosures filed in Polk County, Florida during 2019. This is down from the peak year of 2009 where 10,747 foreclosures were filed. The foreclosure rate has been steadily declining to a low of 1,527 in 2017. The breakdown in the following chart shows the number of foreclosures filings since 2003 in Polk County.

**Foreclosures Filed by Year**

<b>Year</b>	<b>Number of Foreclosures Filed</b>
2003	2,839
2004	2,417
2005	2,096
2006	2,345
2007	5,132
2008	9,467
2009	10,747
2010	6,748
2011	3,906
2012	6,288
2013	4,109
2014	2,714
2015	2,348
2016	1,982
2017	1,527
2018	1,849
2019	1,664
TOTAL	68,178

**Sources:** Polk County Clerk of Court

## Educational Attainment

### Population 25 Years and Older

Approximately 88.8 percent of the population 25 years old and over in Polk County is a high school graduate or higher and approximately 26.0 percent has a bachelor's degree or higher. The 11.2 percent of the population that has an educational attainment of less than high school has a median earning of \$23,892 and a 31.2 percent poverty rate.

**City of Lakeland Educational Attainment  
Population 25 Years Old and Over**

Educational Attainment	Percentage of Population	Median Earnings	Poverty Rate
Less than high school graduate	11.2%	\$23,892	31.2%
High school graduate (includes equivalency)	34.3%	\$26,915	18.7%
Some college or Associate's degree	28.2%	\$32,448	11.2%
Bachelor's degree	17.0%	\$46,263	5.1%
Graduate or professional degree	9.3%	\$52,461	--

Source: American Community Survey, 2018 5-Year Survey, Table S1501

## Housing

### Dwelling Units by Type

Approximately 51.7 percent of the City's housing stock is single-family units (attached or detached) versus 60.5 percent for Florida and 63.5 percent in Polk County, 60.5 percent in Florida, and 67.3 percent nationwide. The City has more than twice the percentage of mobile homes than the nation and nearly twice as much as the State. Polk County has approximately 21.3 percent of the housing stock composed of mobile homes compared to the City's 15.6 percent.

**Lakeland Number of Dwelling Units  
Built by Type**

Dwelling Unit Type	Number	Percentage
1-unit detached structure	23,879	48.40%
1-unit, attached structure	1,616	3.30%
2 units	2,809	5.70%
3 to 4 units	3,086	6.30%
5 to 9 units	3,069	6.20%
10 to 19 units	2,992	6.10%
20 or more units	4,128	8.40%
Mobile Home	7,706	15.60%
Boat, RV, Van, etc.	37	0.10%
<b>Total Housing Units</b>	<b>49,322</b>	<b>100.00%</b>

Source: American Community Survey 2018 5-Year Survey Table DP-04

**Percent Dwelling Units  
Built by Type by Jurisdiction**

Dwelling Unit Type	Lakeland	Polk	Florida	United States
1-unit detached structure	48.40%	61.2%	54.3%	61.6%
1-unit, attached structure	3.30%	2.3%	6.2%	5.8%
2 units	5.70%	3.4%	2.2%	3.6%
3 to 4 units	6.30%	3.6%	3.9%	4.4%
5 to 9 units	6.20%	2.8%	5.0%	4.7%
10 to 19 units	6.10%	2.3%	5.8%	4.5%
20 or more units	8.40%	2.9%	13.5%	9.0%
Mobile Home	15.60%	21.3%	9.0%	6.2%
Boat, RV, Van, etc.	0.10%	0.2%	0.1%	0.1%

Source: American Community Survey 2018 5-Year Survey Table DP-04



## Housing Tenure

Approximately 54.9 percent of the City's houses are owner-occupied, which is lower than the Polk County average of 68.5 percent, the statewide average of 65.0 percent, and the national average of 63.8 percent. There were 14,967 census specified owner-occupied housing units in Lakeland in 2000. The number shown in the American Communities Survey 2007-2011 had increased to 22,962. The number shown in the American Communities Survey 2014-2018 had decreased to 22,494.

### Housing Tenure

Occupied Units Paying Rent	Estimate	Percent
Occupied housing units	40,938	--
Owner-occupied	22,494	54.9%
Renter-occupied	18,444	45.1%
Average household size of owner-occupied unit	2.43	--
Average household size of renter-occupied unit	2.52	--

Source: American Community Survey 2018 5-Year Survey Table DP-04

According to the American Community Survey, 2014-2018, of the 22,494 owner-occupied housing units, more than half of them, 11,968 (53.2 percent) were owned with no mortgage. The highest percentage of homes that were owned "free and clear" indicates that some of the lower income households may be retirees with assets. In that situation, a lower income does not necessarily indicate housing problems. In addition, this population may have survived the recent economic downturn more easily than their neighbors. However, any desire to change their housing situation, i.e., their housing choices, may have been affected. For example, the information shown below concerning the slow sales and reduced prices would have affected seniors who wished to sell their home and move to assisted living.

In 2018, the median contract rent was \$968, which compares to \$869 in 2015. Despite this apparent affordability, 49.9 percent (8,681 households) of the City's renter households spent more than 30 percent of their incomes on housing in 2014-2018.

### Gross Rent as a Percentage of Household Income

Occupied Units Paying Rent	Estimate	Percent
Less than 15.0 percent	1,561	9.0%
15.0 to 19.9 percent	2,328	13.4%
20.0 to 24.9 percent	2,207	12.7%
25.0 to 29.9 percent	2,607	15.0%
30.0 to 34.9 percent	1,564	9.0%
35.0 percent or more	7,117	40.9%
Not Computed	1,060	--

Source: American Community Survey 2018 5-Year Survey Table DP-04

### Year Structure Built

Construction of most of the housing in the City occurred between 1960 and 2010. Approximately 49.0 percent of the housing units in Lakeland are over 50 years old. Many of the homes are part of the City’s active historic perseveration communities.

### Age of Housing

Percent of Housing Units by Jurisdiction	Lakeland	Polk	Florida	United States
Built 2014 or later	1.1%	1.9%	1.9%	1.6%
Built 2010 to 2013	1.6%	2.3%	2.5%	2.6%
Built 2000 to 2009	15.5%	24.6%	19.7%	14.3%
Built 1990 to 1999	13.0%	17.7%	17.1%	13.9%
Built 1980 to 1989	20.2%	18.6%	20.4%	13.5%
Built 1970 to 1979	20.8%	15.4%	17.9%	15.3%
Built 1960 to 1969	10.5%	7.9%	9.2%	10.7%
Built 1950 to 1959	8.5%	6.4%	7.1%	10.4%
Built 1940 to 1949	3.1%	2.0%	2.1%	5.0%
Built 1939 or earlier	5.7%	3.3%	2.2%	12.8%

Source: American Community Survey 2018 5-Year Survey Table DP-04

## Substandard Housing

The U.S. Bureau of Census defines substandard housing as units that are: 1) overcrowded (more than 1.01 persons per room; 2) lacking complete kitchen or plumbing facilities; or 3) where no heating fuel is used. Lakeland has a higher percentage of overcrowded units than Polk County, Florida or the nation but a lower percentage than Florida or the nation for the remaining substandard housing characteristics.

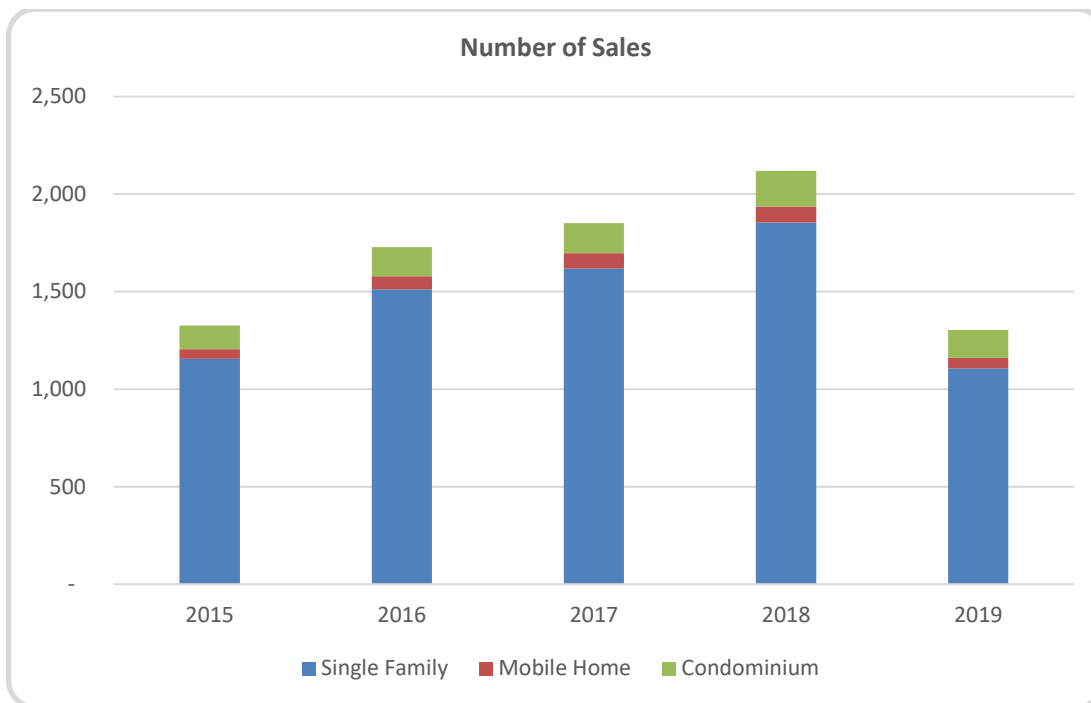
### Substandard Housing for Occupied Housing Units

Location	Overcrowded Units (>1.01 person per room)	No Heating Fuel Used	Lacking Complete Kitchen Facilities	Lacking Complete Public Facilities
Lakeland	5.0%	0.9%	0.8%	0.3%
Polk County	3.7%	1.0%	0.5%	0.2%
Florida	3.0%	1.8%	0.7%	0.3%
United States	3.4%	1.1%	0.8%	0.4%

Source: American Community Survey 2018 5-Year Survey Table DP-04

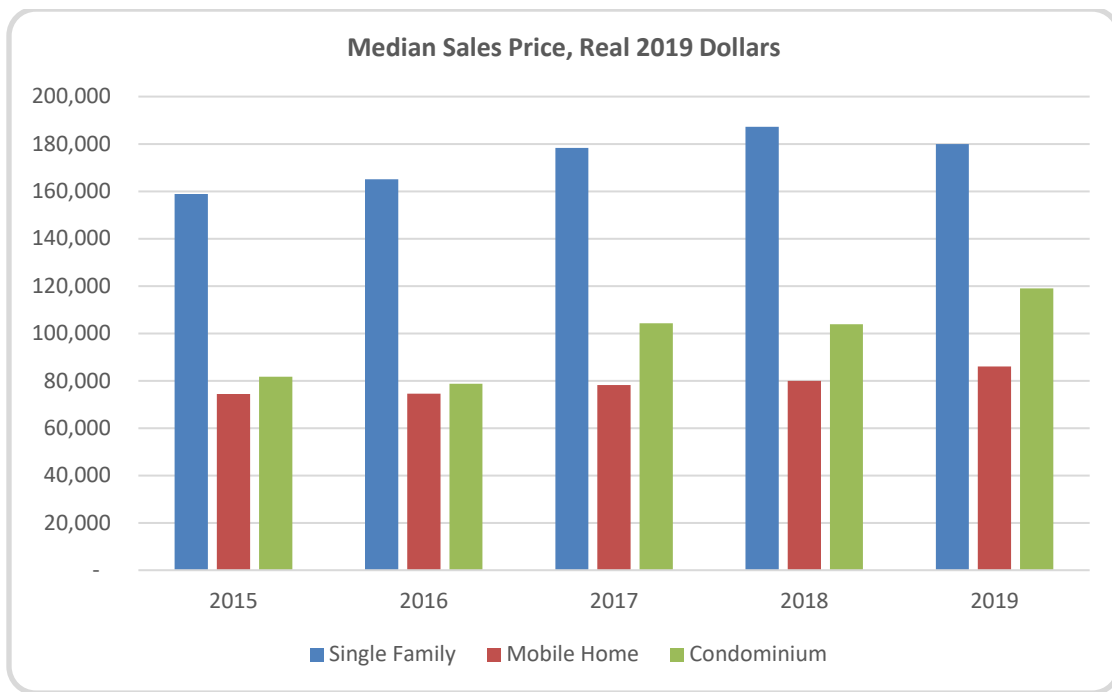
## Existing Home Sales

The number of existing home sales rose consistently since 2015, but declined in 2019 for single family homes, mobile homes, and condominiums. Sales of single family homes is significantly higher than sales for mobile homes and condominiums.



**Source:** Shimberg Center for Housing Studies

Sales of single family homes is significantly higher than sales for mobile homes and condominiums. The median sales price for a single family home was \$158,922 in 2015 and \$180,000 in 2019 (2019 real dollars). The median sales price for a mobile home was \$81,727 in 2015 and \$119,000 in 2019 (2019 real dollars). The median sales price for a condominium was \$67,377 in 2015 and \$88,250 in 2019 (2019 real dollars) Although for-sale housing costs have retreated from all-time highs, the median sales priced home in Lakeland is still unaffordable to a large and growing segment of our citizens, including the workers who fill the critical service industry jobs which are essential to Lakeland, Polk County, and the State of Florida.



Source: Shimberg Center for Housing Studies

### Home Mortgage Disclosure Act

All U.S. financial institutions following Home Mortgage Disclosure Act (HMDA) data filing requirements if they meet certain criteria, such as having assets above a specific threshold. This law was enacted by Congress to provide adequate home financing to qualified individuals on reasonable terms and conditions. Data collected can be used to identify probable housing discrimination. The basic regulatory inquiry revolves around whether a protected class of persons is being denied a loan or offered different terms for reasons other than objectively acceptable characteristics such as income or collateral.

The 2018 HMDA data on the Florida Housing Data Clearinghouse was reviewed to identify problems in area lending. Success rates of mortgage loan applications were lowest for whites; however, approximately 30 percent of the applicants did not provide race information. The 44.9 percent denial rate for African Americans is more than double the 21.2 percent denial rate for Caucasians. The Native Hawaiian/Other Pacific Islander group experienced the highest denial rate of 58.3 percent, which is also a concern. For persons who identify as Hispanic or Latino Ethnicity experienced a 35.4 percent denial rate. The other categories are considered to be inconclusive due to the smaller numbers.

### Home Purchase Loan Approval/Denial by Race or Hispanic/Latino Ethnicity, 2018

Applicant	Loan Originated	Application Denied	Other	Applicant
<b>Race</b>				
American Indian/Alaska Native	7	6	7	30.0%
Asian	38	22	19	27.8%
Black/African American	89	92	24	44.9%
Native Hawaiian/Other Pacific Islander	2	7	3	58.3%
White	1,464	532	513	21.2%
Not provided by applicant	195	128	107	29.8%
Not applicable	54	7	9	10.0%
Missing	0	1	0	--
<b>Hispanic or Latino Ethnicity</b>	167	103	21	35.4%

Source: Florida Housing Data Clearinghouse HMDA 2018

### Home Purchase Loan Application Denial Reasons, 2018

Denial Reason	Applications
Debt-to-income ratio	192
Employment history	10
Credit history	283
Collateral	119
Insufficient cash (down payment, closing costs)	24
Unverifiable information	20
Credit application incomplete	61
Other	81
Unavailable	5

Sources: Florida Housing Data Clearinghouse HMDA 2018

In previous years, it was possible to review the reasons for denials by race or Hispanic/Latino ethnicity to determine if the reason for denial was similar between the races and Hispanic ethnicity. Determining the reasons for denial can assist in the development of policies and practices to better serve potential loan

applicants. However, information on reasons for denials by race or Hispanic/Latino ethnicity is no longer available online, so this analysis was not possible.

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

## Assisted Housing

### Housing Units Available to Serve Elderly/Family with Disabilities

The table below indicates units available to serve the target population for persons with disabilities and/or in need of assistance. These affordable rental developments receive federal, state, or local funding.

**Inventory of Federal, State, and Locally Assisted Units  
for the Elderly, Disabled, and Families**

Development Name	City	Total Units	Assisted Units	Population Served
Abilities at Eagle's Nest	Lakeland	5	5	Disabilities
Aida Palms	Lakeland	96	96	Family
Bonnet Shores	Lakeland	75	75	Family
Cambridge Cove	Lakeland	200	200	Family
Cambridge Cove II	Lakeland	80	80	Family
Colton Meadow	Lakeland	72	72	Family
Country Manor Apartments	Lakeland	48	48	Family
Crystal Wood Apartments	Lakeland	64	63	Family
Dakota Park	Lakeland	40	40	Family
Florida Baptist Children's Home	Lakeland	44		
Florida Family Baptist Ministries	Lakeland	7		
Hampton Hills Homes	Lakeland	7	7	Family
Highland Apartments	Lakeland	50	49	Family
Highland Apartments II	Lakeland	28	28	Family
Lakeland Presbyterian Apartment	Lakeland	196	196	Elderly
Lakeview	Lakeland	104	104	Elderly
Presbyterian Homes				
Lakewood Terrace Apartments	Lakeland	132	132	Family
Peace River	Lakeland	19	19	Disabilities
Center Properties				
Providence Reserve	Lakeland	139	139	Elderly
Renaissance at	Lakeland	196	196	Family
Washington Ridge				
St. Luke's Life Center	Lakeland	150	150	Family
Sterling Place	Lakeland	70	69	Elderly
Sunrise Communities	Lakeland	25 beds		
Trinity Apartments	Lakeland	70	70	Elderly
Villas at Lake Bonnet	Lakeland	75	75	Family
Villages at Noah's Landing	Lakeland	126	126	Family/Disabilities
Noah's Nest	Lakeland	13		
Noah's Ark				
Washington/The Manor	Lakeland	197	111	Elderly/Family
Wilmington	Lakeland	200	200	Family

**Sources:** Shimberg Center for Affordable Housing  
 Florida Baptist Children's Home  
 Florida Developmental Disabilities Resources, 2020



## *City of Lakeland Policies related to Affordable Housing*

### **Accessory Dwelling Units**

The City's Land Development Code allows for accessory dwelling units. Such dwelling units have been identified as a tool to address affordable housing. Such dwellings may provide affordable housing for the elderly, single persons, couples, college students or others.

### **Zoning**

The City's residential zoning codes are consistent with Florida Statutes 419.001(2) which provide that a home with six or fewer residents, whether or not related, are deemed to be single-family residential and are allowed in single-family (or multifamily) zoning without special approval. The local housing Code defines family as up to 5 unrelated persons. In other words, there is no limit on the number of related persons that constitutes a single family for zoning and housing purposes.

### **Public Policies**

Throughout this review of City activities and codes, policies and planning, services and requirements, there were no items which surfaced which gave any indication of restrictive attitudes or practices. The City has in place an ongoing process for the review, prior to adoption, of local policies, ordinances, regulations, and plan provisions that increase the cost of housing. The City provides expedited permitting processes for affordable housing development and construction.

### **Sale, Rental, and Brokerage Services**

The local newspapers that serve Lakeland print HUD's "Published Fair Housing Notice" at the beginning of the Real Estate section of the paper on a weekly basis. There were no noted references which might have indicated discriminatory practices ("exclusive," "private," "protected," etc.) No complaints have been received concerning any of these services.

## *Incentives to Promote Affordable Housing Opportunities*

The City's Affordable Housing Incentive Plan became effective December 6, 1993 and contains provisions for expediting the permitting process for affordable housing development. Provisions include the following.

**Single Family Infill Construction:** The City's Building Inspection Division has a relatively short turnaround time for permitting single family infill construction. Special consideration is given to expedite the process of issuing building permits to those developers who have qualified as "affordable housing developers." A list of qualified affordable housing developers has been created by the Neighborhood Services Division and is provided to the permit clerks of the Building Inspection Division. An updated list of affordable housing developers is provided periodically. The City's housing staff meets at least annually with the City's Building Official to review the process and update as necessary.

**Multi-Family Developments:** All builders of affordable multi-family developments shall be approved by the City's Affordable Housing Review Committee (AHRC). Multi-family developments shall receive expedited permitting as referenced above. However, by their nature, larger multi-family developments must be reviewed and approved by multiple City service areas such as plans examiner, planning and zoning, traffic, landscape, electric, water, fire, etc. Multi-family developers are encouraged to schedule early preliminary meetings with the Development Review Team (DRT) to assist in an early resolution of any development/plan requirements.

**Ongoing Review Process:** The Affordable Housing Advisory Committee (AHAC) was created to review established policies and procedures, ordinances, development regulations, and the adopted local comprehensive plan, and shall recommend specific initiatives to encourage or facilitate affordable housing while protecting the ability of the property to appreciate in value. Also included in the incentives is the waiver and/or reimbursement of impact fees, the urban infill lot program (an inventory of City owned land suitable for affordable housing) and the support of development near transportation hubs, employment centers and mixed use developments.

# City of Lakeland Housing Programs

The City of Lakeland Community & Economic Development Department administers Federal and State grant programs for the Community Development Block Grant (CDBG) Program; HOME Investment Partnerships Program and the State Housing Initiatives Partnership (SHIP) Program.

## **Community Development Block Grant (CDBG) Program**

The CDBG program provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized the Housing and Community Development Act of 1974.

The U.S. Department of Housing and Urban Development (HUD) awards grants to entitlement community grantees to carry out a wide range of community development activities directed toward revitalizing neighborhoods and providing improved community facilities and services. The City is an entitlement community and receives CDBG funding. Each CDBG-funded project must meet one of the three national objectives: 1) benefit low- and moderate-income persons; 2) prevent or eliminate slum and blights; and 3) meet other community development needs having a particular urgency. The Community Development Block Grant also funds the county's demolition program, which is designed to eliminate slum and blight in unincorporated areas of the City.

For Fiscal Year 2021 the City is allocated approximately \$977,826 of CDBG funds. The vast majority of CDBG funds are used primarily for low and moderate income persons and households, in accordance with CDBG regulatory requirements. The City's CDBG funds have primarily been used for owner occupied rehabilitation program and code enforcement along with infrastructure projects if in eligible areas. In addition to affordable housing projects and infrastructure improvements, CDBG funds are also used to provide public services to eligible agencies that provide services for youth, seniors, persons with disabilities, and homeless populations.

The need for the provision of public services for underserved individuals and families is extensive in Lakeland. The City is fortunate to have many local non-profit organizations with the capacity to successfully provide services that include, but are not limited to, children and youth, the homeless, disabled children and adults, the working poor, people with severe or chronic substance addictions, and battered women. CDBG and General Funds funding is provided to non-profit agencies for their public service programs.

## **HOME Investment Partnership (HOME) Program**

The HOME Program was created by the National Affordable Housing Act of 1990. The City participates in the HOME Program and receives an annual allocation. The City's HOME funds are used for owner-occupied rehabilitation/reconstruction down payment assistance for homebuyer and rental construction. In accordance with HOME Program regulations, funds are used to build, buy, and/or rehabilitate affordable housing for rent, homeownership, or to provide rent assistance to low-income individuals.

## State Housing Initiatives Partnership (SHIP) Program

The SHIP Program provides funds to local governments as an incentive to create partnerships that produce and preserve affordable homeownership and multi-family housing. The program was designed to provide very low, low, and moderate-income families with assistance to purchase a home, money to repair or replace a home, and many other types of housing assistance. The SHIP program was created by the William Sadowski Act in 1992. Over the years, the SHIP trust fund has been reduced in response to the State of Florida efforts to balance the state budget. The Florida Housing Finance Corporation manages the SHIP program at the State level and keeps cities and counties informed of any proposed changes to the SHIP Program. In accordance with SHIP Program guidelines SHIP funds are used primarily for construction activities and homeownership focused projects.

## Other City Programs

In addition to the above-mentioned programs, the City of Lakeland implements the following programs.

**Down Payment/Closing Costs Assistance Program:** This assistance may be used for the purchase of existing homes, newly constructed homes, or existing rehabilitated homes. The home must be located in the City. To be eligible for down payment assistance, applicants must income qualify as homebuyer.

**Homeownership New Construction Program:** This program facilitates the construction of new units (single family, townhouses, or duplexes) to be sold to low to moderate income clients.

**Rental Construction Program:** HOME, Community Redevelopment Agency (CRA), and SHIP funds (if allocated) may be utilized to fund multi-family rental projects.

**Rental and Mortgage Assistance (due to COVID-19):** Due to the COVID pandemic, the City is administering Utilities, Rental and Mortgage Assistance programs. Assistance is provided to those persons who lost jobs or had wages reduced due to COVID-19. The funds are paid directly to the landlords and utility provider.

**Residential Emergency Repair Program:** This program focuses on situations that need immediate remedy such as: a damaged roof that is leaking; failing septic systems spilling sewage on the ground; or non-functioning water systems that pose an immediate health hazard to the occupants of the unit.

**Residential Owner-Occupied Rehabilitation Program:** Clients must own their home as the primary residence. This program includes repairs needed to correct code enforcement violations, health and safety issues, roofing systems (including soffit and fascia), septic tanks, and potable water wells. Repairs addressing handicapped accessibility such as ramps, grab bars, and widening doors are also included in this program. Homeowners who are very low, low, or moderate-income persons may be eligible for assistance.

**Residential Reconstruction Assistance Program:** This program provides housing for very low and low-income

homeowners in which the homes are not feasible for rehabilitation.

**Discounted Lots Program:** The City and Community Redevelopment Agency own lots to be sold to general contractors/developers at discounted cost for construction of affordable housing units.

**Waiver or Reimbursement of Non-Utility Impact Fees Program:** Contractor and/or developers of affordable housing projects may qualify for the waiver or reimbursement for impact fees for fire, police, parks and recreation, and transportation.

**Affordable Housing Advisory Committee:** In accordance with Florida Statutes and the Florida Administrative Code, the County has an Affordable Housing Advisory Committee (AHAC) that represents 11 specific areas of expertise with regard to planning and affordable housing. AHAC is responsible for the triennial review of established policies and procedures, ordinances, land development regulations, and the comprehensive plan. AHAC may recommend specific actions or initiatives to encourage or facilitate affordable housing which may include the modification or repeal of existing policies, procedures, ordinances, regulations, or plan provisions; the creation of exceptions applicable to affordable housing; or the adoption of new policies, procedures, regulations, ordinances, or plan provisions. AHAC is to submit a report to the local governing body that includes recommendations on, and triennially thereafter which evaluate the implementation of affordable housing incentives.

# Housing Partners

On November 10, 2020, the Central Florida Regional Planning Council facilitated a virtual meeting for the housing partners and stakeholders of Polk County and the City of Lakeland. A total of 22 people representing several housing and community partners attended. A list of partner agencies in attendance is provided below.

- ALPI, Inc.
- Central Florida Regional Planning Council
- City of Lakeland
- Habitat for Humanity
- Heart of Winter Haven
- InterAct Alliance
- Peace River Center
- Polk County
- Saint Vincent de Paul
- Sunrise Community
- Talbot House
- United Way
- Volunteers in Service to the Elderly (VISTE)

Input was also solicited from the Keystone Challenge Fund and the Homeless Coalition of Polk County. A summary of input received at both meetings is provided below. Both meetings included discussion surrounding barriers for residents to achieve affordable housing.

- 1) One of the most significant barriers for low-income residents is a lack of education regarding the types of home assistance programs and services available.
- 2) Many people do not have regular access to the Internet. This is an impediment since most information is only available online.
- 3) There is a perception that “affordable” is a rent or mortgage payment of \$1,000 per month. However, for many, this is cost prohibitive.
- 4) The cost of transportation and the lack of public transportation is an impediment to affordable housing.
- 5) A landlord registration program is needed to track landlords to be sure they are treating their tenants fairly.
- 6) Many people have difficulty maintaining an acceptable credit rating to qualify for mortgages.

- 7) More education and improved access to the housing rehabilitation programs is needed to assist homeowners to stay in their homes including the elderly.
- 8) Both the County and the City offer rehabilitation programs but there is often a long waiting list. The City completes about 4 reconstructions per year and several major rehabilitation projects.
- 9) Accessory dwelling units (ADU) were discussed as an option for many low-income residents. ADUs are permitted in residential zoning districts.
- 10) Lack of information regarding housing assistance programs and the lack of available affordable units are consistently significant barriers for very low, low and moderate-income residents in search of affordable housing.

# Community Outreach

## *Housing Choice Survey*

The City, in partnership with the Central Florida Regional Planning Council, developed an online community survey to obtain feedback regarding fair housing in the City. The survey was available in English and Spanish. A total of 171 surveys were completed. Due to the COVID-19 pandemic, it was more difficult to distribute printed copies of the survey than in past years.

The majority of respondents, 56 percent, had not experienced housing discrimination. Approximately 27 percent of the respondents indicated they experienced housing discrimination and indicated such discrimination was based on race and color. When asked who engaged in discriminatory practices, respondents cited landlords and property managers most frequently followed by other which included mortgage lenders. Of the respondents who believe they experienced housing discrimination; 63 percent did not report the incident. Reasons provided for not reporting the discrimination included: 1) belief that reporting will not make a difference; 2) not knowing where to report housing discrimination; 3) belief that it is too much trouble to report housing discrimination; and 4) fear of retaliation. The complete results of the survey are provided in this report's Appendix A.

## *Community Workshop*

On November 17, 2020, the City of Lakeland held a virtual community workshop to discuss fair housing in the City. Goals of the workshop were to inform the public about the Assessment of Fair Housing and to provide an opportunity for all to participate in the fair housing planning process and provide feedback on fair housing issues. A total of 36 people attended including staff from the City of Lakeland, Polk County and the Central Florida Regional Planning Council. A substantive discussion was held, and it was made clear that one of the biggest barriers for low-income residents is a lack of educating the public regarding the types of homes and services are available and how to obtain them. There is no central clearinghouse for persons looking for affordable housing. Another significant barrier is access to the Internet; many people still do not have regular access to the Internet.

Many questions were posed regarding affordable housing, including how long it takes, on average, to obtain an affordable unit, the answer is it could up to three years for Section 8 but much less time for other programs, it all depends on what is available. Questions were also asked about CARES program monies and if there is a clearinghouse for people to obtain help. Additionally, it was asked if anything could be done about the abandoned and/or deserted homes or vacant lots to be used for affordable units.



Several options that are currently available were discussed including a multi-family tax credit, but there is limited supply of multi-family units. The City offers impact fee waivers to incentivize the development of affordable units. Another issue is housing rehabilitation, the City offers rehab programs but there is often a long wait list.

Accessory dwelling units (ADU) were discussed as a good option for many low-income residents. ADUs are currently only permitted in all residential zoning districts.

Having a clearinghouse for information, education and lack of available units are consistently the biggest barriers for low-income residents looking for housing.

The workshop agenda and presentation materials are provided in Appendix B of this report.

# Fair Housing Findings and Impediments

Through the Assessment of Fair Housing process including review of existing conditions, input from housing partners, community survey results and community input, the following findings and impediments to fair housing have been identified.

- 1) Ownership rates, while consistent with national percentages, are lower for African American and Hispanic households than for white households.
- 2) HMDA data reveals a larger percentage of African Americans being denied mortgages than whites.
- 3) There is need for greater education and outreach regarding housing assistance programs and fair housing including where to report housing discrimination.
- 4) Many people do not have regular access to the Internet. This is an impediment since most information is only available online.
- 5) The cost of transportation and the lack of public transportation is an impediment to affordable housing.
- 6) Many people have difficulty maintaining an acceptable credit rating to qualify for mortgages.
- 7) Both the County and the City offer rehabilitation programs but there is often a long waiting list.
- 8) Lack of information regarding housing assistance programs and the lack of available affordable units are consistently significant barriers for very low, low and moderate-income residents in search of affordable housing.

# Actions to Address Impediments

In analyzing the impediments to fair housing within the City of Lakeland the following actions are needed to address impediments to fair housing choice.

## ***Goal 1: Expand Education and Outreach with regard to Fair Housing issues and where to report incidents of Discrimination.***

### **Actions:**

- Increase awareness about fair housing providing updated information on the City website.
- Make the housing information readily available on the home page of the City website.
- Continue to distribute fair housing materials at community meetings, town hall meetings, and other events.
- Provide public service announcements quarterly on local media as well as local radio stations.
- Facilitate an annual fair housing symposium to educate partners and the community.
- Coordinate with the Polk County School Board to provide information to parents.
- Work with local adult/continuing education providers and job search assistance agencies to better identify barriers their students/clients face.

## ***Goal 2: Expand Education and Outreach with regard to available Housing Assistance Programs.***

### **Actions:**

- Increase awareness about available housing assistance programs through public service announcements on local media and local radio stations.
- Coordinate with lenders to disseminate information.
- Coordinate with local education institutions to disseminate information.
- Coordinate with the municipalities including the building departments and housing authorities to provide information.
- Coordinate with local government code enforcement departments to provide information to homeowners in need.
- Facilitate an annual fair housing symposium to educate partners and the community.
- Coordinate with Polk County School Board to provide information to parents.

## ***Goal 3: Continue and enhance coordination between housing and other community partners, local governments, and housing authorities with regard to fair housing and housing assistance programs.***

### **Actions:**

- Increase awareness about available housing assistance programs through public service announcements on local media and local radio stations.
- Coordinate with lenders to disseminate information.
- Coordinate with local education institutions to disseminate information.

***Goal 4: Continue to address the need for rental subsidy and financing mechanisms to assist very low, low and moderate-income homebuyers and renters.***

**Actions:**

- Increase awareness about available housing assistance programs through public service announcements on local media and local radio stations.
- Continue existing programs including the Tenant Based Rental Assistance Program, the Housing Rehabilitation Program and the State Housing Initiatives Partnership (SHIP) Program.

***Goal 5: Continue to provide homebuyer education to assist potential purchasers to qualify for home loans.***

**Actions:**

- Continue Homebuyer Education Program.
- Increase awareness about available housing assistance programs through public service announcements on local media and local radio stations.

***Goal 6: Address the relationship of transportation to affordable housing.***

**Actions:**

- Work with developers to encourage affordable housing near public transit facilities and promote higher densities allowed within Transit Oriented Corridors as provided for in the Comprehensive Plan.

***Goal 6: Draft affordable housing-friendly development regulations to allow for greater flexibility in affordable housing project design.***

**Actions:**

- Develop innovative regulations, such as reservation of infrastructure, incentivizing rental development near public transit and financing transit oriented rental development, to assist in addressing regulatory impediments to affordable housing.
- Ensure all development applications are considered, reviewed, and approved without prejudice to the potential residents.

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