



Collier County 2021 Regional Analysis of Impediments to Fair Housing Choice

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Section I: Introduction and Executive Summary of the Analysis

This Analysis of Impediments to Fair Housing Choice (AI) documents a variety of fair housing issues faced by the residents of Collier County, assesses their underlying causes, and identifies goals and actions to address those issues. It aims to harness data, community input, and policy analysis to craft solutions that will have a real impact for the people of Collier County. Ultimately, this information will advance housing choice and stability, help families break the cycle of poverty and find new opportunities, address segregation, and invest in the communities that need it most.

The goal of the analysis is to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

As recipients of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development, the County must periodically develop an AI, to better understand current fair housing needs in the County and communicate these needs to the public. The AI is a part of a multi-stage planning process: it provides a focused, comprehensive look into fair housing issues and generates fair housing goals, which the County can then use to inform later planning processes, such as the Consolidated Plan (designating use of block grant funds), as well as other relevant activities.

While housing issues are complex and multi-faceted, and affect all residents of the County, the purpose of this AI is to focus specifically on *fair housing* and related needs and actions. The AI therefore 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 disability. It also includes characteristics protected under state and local law.

The AI follows the Assessment of Fair Housing process and template, as developed by HUD in its Fair Housing Planning Guide. As described below, its scope includes in-depth looks at a number of areas relevant to fair housing, including: trends and description of demographics; patterns of segregation and integration; identification of racially/ethnically concentrated areas of poverty (“R/ECAPs”); disproportionate housing needs (including cost burden and the adequacy and safety of housing); disparities in access to opportunity (education, employment, low poverty exposure, and environmental health); disabilities and access; publicly-supported housing; and fair housing enforcement, outreach, and capacity. In addition to data, maps, and policy analysis, it examines barriers to fair housing and their underlying causes (“contributing factors”). Most importantly, its data and analyses (including community input) provide the foundation for meaningful fair housing goals that address specific local issues.

This analysis examines several dimensions of access to opportunity, by supplementing HUD data with local data and knowledge. Often, groups that have experienced housing discrimination have lower access to a variety of opportunity factors, which are discussed in this document. These disparities include lower access to educational opportunity, employment; transit; lower access to areas of concentrated poverty (low poverty exposure); and lower access to healthy neighborhoods. Lack of access to opportunity factors often goes hand-in-hand with segregation and housing choice.

As a composite, HUD and other local data show that:

- Access to opportunity is **highest** for non-Hispanic Whites in Collier County. The various report measurements show that County neighborhoods with the most Whites have the most access to opportunity.
- Access to opportunity is **lowest** for non-Hispanic Blacks and Hispanics. The various report measurements show that census tracts with the highest numbers of Blacks and Hispanics have the lowest scores in the categories that measure access to opportunity.
- In addition, opportunity scores are often lower on average in those County neighborhoods with higher numbers of foreign-born individuals.
- Geographic trends are also evident. Across various dimensions, access to opportunity is highest in western and north-western sections of the County, and in the cities of Marco Island and Naples.

Significant contributing factors to disparities in access to opportunity include:

- Availability of reliable public transportation;
- Lack of access to opportunity due to rising housing costs;
- Lack of regional and local cooperation;
- Location of employers;
- Location of schools and student assignment plans; and
- Location of environmental health hazards.

Study Authors

The 2021 Analysis of Impediments to Fair Housing Choice was conducted by Community Planning Insights (CPI) and Hope Strategy Group. CPI is a small planning firm located in Dayton, Ohio that focuses on community and neighborhood planning, housing policy, community engagement, and comprehensive planning for communities of all sizes. Hope Strategy Group (HSG) is a management consulting firm located in Toledo, Ohio that specializes in assisting professionals, organizations, and communities in reaching their full potential through leadership development and coaching, operational performance management, and developing strategies for a more equitable workplace and distribution of investments in communities.

Aaron K. Sorrell, AICP principal and owner, has nearly 20 years of experience in the planning and community development field, primarily focused on community and neighborhood development policy and implementation for medium and large cities. Aaron is a certified planner with the American Institute of Certified Planners (AICP) and a certified Economic Development Professional by the National Development Council. Aaron has managed numerous planning and community development projects including zoning and land use regulations, community development strategies, housing and neighborhood studies and effective community engagement and visioning.

Catherine Crosby, HSG managing partner and owner, has nearly 20 years of experience in civil rights enforcement in the areas of housing and employment, developing equitable community and economic development strategies supported by cross sector partnerships, working with communities to address intergroup tension, and implementing community relations programs and initiatives that foster diversity, equity, and inclusion within organizations and communities. Catherine is a Credentialed Manager through the International City/County Managers Association (ICMA) and a board member of the National Community Reinvestment Coalition (NCRC) and the Higher Learning Commissioner (HLC). She has worked with community and

regional banks to develop community benefit agreements and assisted financial institutions with developing programs and products to meet the unique needs of communities in their markets.

Methodology Used

This document consists of five sections:

- Introduction and Executive Summary
- Jurisdictional Data Analysis
- Identification of Public and Private Sector Impediments of Fair Housing Choice

This section will review local, state, and federal policies to determine if they exacerbate or eliminate impediments to fair housing choice. This section will also provide an analysis of the local lending environment.

- Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

This section reviews the local jurisdictions fair housing programs and activities to determine if they support or hinder fair housing choice. This section also includes an analysis of fair housing complaints filed with HUD or the local jurisdiction and an overview of whether the previous studies recommendations have been addressed.

- Fair Housing Plan

This section identifies implementation strategies to eliminate or mitigate the negative impacts of specific barriers identified through the data and policy analysis. Actions identified to address the impediments to fair housing will be included in the County's FY 2021-2025 Five Year Consolidated Plan.

Community Engagement and Survey Results

The study engaged the community through a community needs assessment as well as focus groups and individual interviews with key stakeholders. The focus groups included affordable housing developers and advocates. There were 509 responses to the community needs assessment and fair housing survey. Approximately 70% of respondents were female and 30% male. Of the total respondents, 64.82% were White, 24.9% were Hispanic, and 7.31% were Black. Males were under-represented as survey respondents based on their representation in the community. Survey respondents represented the race and ethnicity of county residents.

A third of respondents had two people living in the household. Over 60% of respondents were homeowners, which is somewhat less than the percentage of homeowners in Collier County. Over 78% of respondents indicated a need for affordable housing with over 74% indicating a need for rental assistance programs for low-income households.

Over 38% of respondents indicated that they had been discriminated against or knew someone that had been discriminated against. The remaining 60% indicating they had not or did not know someone who experienced housing discrimination. Of those that responded they had or knew someone that had experienced discrimination, almost 80% indicated it was renting an apartment compared to approximately 20% indicating they experienced discrimination while purchasing a home. Over 30% of respondents indicated that discrimination was based on source of income, and another 27% indicated it was due to race. Almost 20% indicated other reasons for the discrimination.

Of the approximately 7% that indicated they had requested an accommodation from their landlord, 80% indicated that the landlord did not fulfill their request.

When following were the top by responses when respondents were asked about perceived barriers to fair housing choice:

- Lack of quality affordable housing - 71%
- Insufficient income - 70%
- Lack of employment opportunities - 35%
- Discrimination - 26%
- Insufficient access to public assistance or services – 25%

Survey respondents indicated there is a lack of fair housing enforcement and education, which was also a theme in the focus group. Over 72% of survey respondents did not know where to report housing discrimination. Over 88% responded they had not seen any advertising or flyers related to fair housing enforcement or housing counseling in the past 12 months.

Source of Funding for the Study

This study is being funded with federal Community Development Block Grant funds from Collier County.

Glossary of Terms

Accessibility: whether a physical structure, object, or technology is able to be used by people with disabilities such as mobility issues, hearing impairment, or vision impairment. Accessibility features include wheelchair ramps, audible crosswalk signals, and TTY numbers. See: TTY

Affirmatively Further Fair Housing (AFFH): a requirement under the Fair Housing Act that local governments take steps to further fair housing, especially in places that have been historically segregated.

American Community Survey (ACS): a survey conducted by the US Census Bureau that regularly gathers information about demographics, education, income, language proficiency, disability, employment, and housing. Unlike the Census, ACS surveys are conducted both yearly and across multiple years. The surveys study samples of the population, rather than counting every person in the U.S. like the Census.

Americans With Disabilities Act (ADA): federal civil rights law that prohibits discrimination against people with disabilities.

Annual Action Plan: an annual plan used by local jurisdictions that receive money from HUD to plan how they will spend the funds to address fair housing and community development. The Annual Action Plan carries out the larger Consolidated Plan. See also: Consolidated Plan.

Capital Improvement Plan: a short-range plan, usually four to ten years, which identifies capital projects and equipment purchases, provides a planning schedule and identifies options for financing the plan.

CDBG: Community Development Block Grant. Money that local governments receive from HUD to spend on housing and community improvement.

Census Designated Places: a label assigned by the Census Bureau to communities that resemble cities or towns, but which are not formally incorporated and do not have their own municipal government. See: Unincorporated Land.

Census Tract: small subdivisions of cities, towns, and rural areas that the Census uses to group residents together and accurately evaluate the demographics of a community. Several census tracts, put together, make up a town, city, or rural area.

Continuum of Care (CoC): a HUD program designed to promote commitment to the goal of ending homelessness. The program provides funding to nonprofits and state and local governments to quickly rehouse homeless individuals and families, promote access to and effect utilization of mainstream programs by homeless individuals, and optimize self-sufficiency among individuals and families experiencing homelessness.

Density Bonus: an incentive for developers that allows developers to increase the maximum number of units allowed at a building site in exchange for either affordable housing funds or making a certain percentage of the units affordable.

Disparate Impact: practices in housing that negatively affect one group of people with a protected characteristic (such as race, sex, or disability, etc.) more than other people without that characteristic, even though the rules applied by landlords do not single out that group.

Dissimilarity Index: measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed with a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city's Black/White Dissimilarity Index was 65, then 65 percent of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in the city.

ESG: Emergency Solutions Grant. Funding provided by HUD to 1) engage homeless individuals and families living on the street, 2) improve the number and quality of emergency shelters for homeless individuals and families, 3) help operate these shelters, 4) provide essential services to shelter residents, 5) rapidly re-house homeless individuals and families, and 6) prevent families/individuals from becoming homeless.

Entitlement Jurisdiction: a local government that receives funds from HUD to be spent on housing and community development. Within the Consortium, Antioch, Concord, Pittsburg, and Walnut Creek are entitlement jurisdictions. Other areas receive funding through the County.

Environmental Health Index: a HUD calculation based on potential exposure to harmful toxins at a neighborhood level. This includes air quality carcinogenic, respiratory, and neurological hazards. The higher the number, the less exposure to toxins harmful to human health.

Environmental Justice: the fair treatment and meaningful involvement of all people, especially minorities, in the development, implementation, and enforcement of environmental laws, regulations, and policies. In the past, environmental hazards have been concentrated near segregated neighborhoods, making minorities more likely to experience negative health effects. Recognizing this history and working to make changes in future environmental planning are important pieces of environmental justice.

Exclusionary Zoning: the use of zoning ordinances to prevent certain land uses, especially the building of large and affordable apartment buildings for low-income people. A city with exclusionary zoning might only allow single-family homes to be built in the city, excluding people who cannot afford to buy a house.

Exposure Index: a measurement of how much the typical person of a specific race is exposed to people of other races. A higher number means that the average person of that race lives in a census tract with a higher percentage of people from another group.

Fair Housing Act: a federal civil rights law that prohibits housing discrimination on the basis of race, class, sex, religion, national origin, or familial status. See also: Housing Discrimination.

Federal Uniform Accessibility Standards (UFAS): a guide to uniform standards for design, construction, and alternation of buildings so that physically handicapped people will be able to access and use such buildings.

HOME: HOME Investment Partnership. HOME provides grants to States and localities that communities use (often in partnership with nonprofits) to fund activities such as building, buying, and/or rehabilitating affordable housing for rent or ownership, or providing direct rental assistance to low-income people.

Housing Discrimination: the refusal to rent to or inform a potential tenant about the availability of housing. Housing discrimination also applies to buying a home or getting a loan to buy a home. The Fair Housing Act makes it illegal to discriminate against a potential tenant/buyer/lender based on that person's race, class, sex, religion, national origin, or familial status.

Housing Element: a required chapter in a California city's General Plan which must be regularly reviewed and approved by the state. A Housing Element contains information on the housing needs of the community, including low-income households and people with special needs. It provides a detailed explanation of how the government addresses the needs of the community based on existing and future housing needs, and inventories sites in the community that could accommodate affordable housing development.

Housing Impact Fee: a fee imposed on new construction to help fund affordable housing construction. See also: Commercial Linkage Fee.

HUD Grantee: a jurisdiction (city, country, consortium, state, etc.) that receives money from HUD. See also: Entitlement Jurisdiction.

Inclusionary Zoning: a zoning ordinance that requires that a certain percentage of any newly built housing must be affordable to people with low and moderate incomes.

Individuals with Disabilities Education Act (IDEA): a federal civil rights law that ensures students with a disability are provided with Free Appropriate Public Education that is tailored to their individual needs.

Isolation Index: a measurement of how much the typical person of a specific race is only exposed to people of the same race. For example, an 80 percent isolation index value for White people would mean that the population of people the typical White person is exposed to is 80 percent White.

Jobs Availability Index: number of jobs per 1000 people within a five-mile radius of the census tract center-point. Index is computed by the UC Davis Center for Regional Change.

Jobs Proximity Index: a HUD calculation based on distances to all job locations, distance from any single job location, size of employment at that location, and labor supply to that location. The higher the number, the better the access to employment opportunities for residents in a neighborhood.

Labor Market Engagement Index: a HUD calculation based on level of employment, labor force participation, and educational attainment in a census tract. The higher the number, the higher the labor force participation and human capital in the neighborhood.

Limited English Proficiency (LEP): residents who do not speak English as a first language, and who speak English less than “very well.”

Local Data: any data used in this analysis that is not provided by HUD the U.S. Census Bureau.

Low Income Housing Tax Credit (LIHTC): provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing.

Low Poverty Index: a HUD calculation using both family poverty rates and public assistance receipt in the form of cash-welfare (such as Temporary Assistance for Needy Families (TANF)). This is calculated at the Census Tract level. The higher the score, the less exposure to poverty in the neighborhood.

Low Transportation Cost Index: a HUD calculation that estimates transportation costs for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the lower the cost of transportation in the neighborhood.

Market Rate Housing: housing that is not restricted by affordable housing laws. A market rate unit can be rented for any price that the market can support.

NIMBY: Not In My Back Yard. A social and political movement that opposes housing or commercial development in local communities NIMBY complaints often involve affordable housing, with reasons ranging from traffic concerns to small town quality to, in some cases, thinly-veiled racism.

Poverty Line: the minimum level of yearly income needed to allow a household to afford the necessities of life such as housing, clothing, and food. The poverty line is defined on a national basis. The US poverty line for a family of four with two children under 18 is \$22,162.

Project-Based Section 8, Project-Based Rental Assistance, PBRA: a government-funded program that provides rental housing to low-income households in privately owned and managed rental units. The funding is specific to the building. If you move out of the building, you will no longer receive the funding.

Public Housing: housing that is owned and managed by a Public Housing Authority for eligible low-income households.

Publicly Supported Housing: housing assisted with funding through federal, State, or local agencies or programs, as well as housing that is financed or administered by or through any such agencies or programs.

Other Multi-Family Housing: multifamily housing that is owned and operated by private owners, and is subsidized through programs other than HCV, PBRA, or LIHTC. Units include properties funded through Supportive Housing for the Elderly (Section 202), and Supportive Housing for Persons with Disabilities (Section 811).

Quintile: twenty percent of a population; one-fifth of a population divided into five equal groups

Ralph Civil Rights Act: a state civil rights law which forbids acts of violence, because of (for example) your race, color, religion, ancestry, national origin, age, disability, sex, sexual orientation, political party, or your part in a labor dispute.

Reasonable Accommodation: a change to rules, policies, practices, or services which would allow a handicapped person an equal opportunity to use and enjoy their housing, including in public and common use areas. It is a violation of the Fair Housing Act to refuse to make a reasonable accommodation when such accommodation is necessary for the handicapped person to have equal use and enjoyment of the housing.

R/ECAPs: Racially and Ethnically Concentrated Areas of Poverty. This is a HUD-defined term indicating a census tract that has more than 50 percent Non-White residents, and 40 percent or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area.

Rehabilitation Act (Section 504): a federal civil rights law that prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment and in the employment practices of federal contractors.

Rent Control: a form of price control that limits the amount a property owner can charge for renting out a home, apartment, or other real estate. Rent can be controlled by setting a maximum dollar amount, or by setting a maximum percentage increase when rents are raised. Rent control is usually put in place by a local law.

School Proficiency Index: a HUD calculation based on performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the number, the higher the school system quality is in a neighborhood.

Segregation: the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means.

Source of Income Discrimination: for purposes of this analysis, housing discrimination based on whether a potential tenant plans to use a Housing Choice Voucher/Section 8 Voucher to pay part of their rent. Increasingly, cities and states are outlawing source of income discrimination. See also: Housing Choice Voucher/Section 8 Voucher.

Superfund Sites: any land in the U.S. that has been contaminated by hazardous waste and identified by the EPA as a candidate for cleanup because it poses a risk to human health and/or the environment.

Supplemental Security Income (SSI): benefits paid to disabled adults and children who have limited income and resources, or to people 65 and older without disabilities who meet the financial limits.

Testers: people who apply for housing to determine whether the landlord is illegally discriminating. For example, Black and White testers will both apply for housing with the same landlord, and if they are treated differently or given different information about available housing, their experiences are compared to show evidence of discrimination.

Transit Trips Index: a HUD calculation that estimates transit trips taken for a family of 3, with a single parent, with an income at 50 percent of the median income for renters for the region. The higher the number, the more likely residents in that neighborhood utilize public transit.

TTY/TDD: Text Telephone/Telecommunication Device for the Deaf. TTY is the more widely used term. People who are deaf or hard of hearing can use a text telephone to communicate with other people who have a TTY number and device. TTY services are an important resource for government offices to have so that deaf or hard of hearing people can easily communicate with them.

Unbanked: not served by a financial institution.

Underbanked: an area that does not have enough banks to meet market demand

Unincorporated land: land that has not been formally converted into a city or town and that does not have its own municipal government. Unincorporated land within the County is governed by the County government. Unincorporated land can still have large communities that resemble cities or towns, even though these communities lack municipal governments. See: Census Designated Places.

Violence Against Women Act (VAWA): a federal law protecting women who have experienced domestic and/or sexual violence. The law establishes several programs and services including a federal rape shield law, community violence prevention programs, protections for victims who are evicted because of events related to domestic violence or stalking, funding for victim assistance services, like rape crisis centers and hotlines, programs to meet the needs of immigrant women and women of different races or ethnicities, programs and services for victims with disabilities, and legal aid for survivors of domestic violence.

Conclusions and Impediments Overview

Impediment 1: Disparity in housing needs and affordable housing throughout Collier County

Lack of affordable housing

- Implement recommendations of the comprehensive housing strategy for more equitable distribution of Low-Income Housing Tax Credit (LIHTC), public housing and multi-family assisted developments throughout the county.
- Develop an affirmative marketing program for housing opportunities that provide outreach to income- and mortgage-eligible households seeking homeownership, with a focus on the segments of the population that may be less likely to apply for affordable housing. Require that all developers involved with affordable housing funds provide an affirmative fair housing marketing plan.
- Monitor and retain existing subsidized housing by proactively engaging with building owners to encourage the preservation of existing affordable housing before the compliance period or Section 8 contracts expire

Lack of diverse housing options for family size

- Encourage the development of multi-family housing with more bedroom options to serve large families in Collier County
- Seek opportunities to provide maintenance programs for renter households with a focus on Immokalee.
- Encourage and support affordable housing projects that meet the average family size of Collier County.

Increased need for accessing housing for the aging population with disabilities and seniors with a focus on senior women.

- Incorporate visitability standards into projects assisted with local funds.
- Provide funding to support financing affordable senior housing projects.
- Provide homeowners downpayment assistance and explore flood insurance support for low- to moderate-income (LMI) homeowners to reduce the cost of purchasing and owning a home.

Impediment 2: Unequal access to opportunity

Income inequality between men and women, and racial or ethnic minorities and Whites.

- Provide workforce and job training opportunities to raise median household income with focus on Immokalee.
- Reduce barriers for women with children to enter the workforce by supporting agencies to expand low-cost, high quality childcare or pre-school programs.
- Develop training programs and education opportunities in Immokalee or enhance transit routes to allow better access to programs throughout the County
- Support agencies that provide housing assistance for undocumented residents.

Lack of access to quality education in Immokalee.

- Provide down-payment assistance to low- and moderate-income first-time home buyers, and other incentives that will encourage teachers to move to Immokalee and make

housing affordable for Collier County essential workers (public safety, education, health care and service industry).

- Expand public transit routes and reduce headway times.
- Encourage and promote transit-oriented development with higher density multifamily housing and mixed-use housing, serving a variety of incomes, abilities, and household sizes.

High percentage of individuals with Limited English Proficiency.

- Ensure all Fair Housing documents are translated into the dominant non-English spoken languages.
- Provide housing counseling services to individuals who are not native English speakers.

Limited access to affordable healthcare.

- Support agency outreach efforts to uninsured low- and moderate-income families during open enrollment periods to reduce the number of uninsured residents.

Impediment 3: Segregated living patterns creating R/ECAP concentrated areas of poverty.

Expand access to areas of opportunity to under-represented groups.

- Develop an affirmative marketing and outreach program to low- and moderate-income, mortgage-eligible households seeking homeownership opportunities.
- Continue to provide down-payment assistance to low- and moderate-income first-time home buyers. Continue to support partnerships with businesses that provide down-payment to their employees. Develop housing incentives that will encourage diversity in various communities.
- Encourage the de-concentration of poverty by expanding Housing Choice Voucher acceptance and utilization through landlord education and support.

Support housing and infrastructure projects that result in new affordable housing units.

- Continue to financially subsidize affordable housing projects, prioritizing assistance to projects in areas with higher home, land, and construction costs.
- Target infrastructure investment to R/ECAP areas to encourage business development.
- Monitor planning and public investments by local and regional entities and seek opportunities to provide public infrastructure and resources that promote housing choice.

Infrequent and limited public transit routes.

- Improve transportation linkages between R/ECAP areas and job centers to lower barriers to work.

Impediment 4: Limited enforcement of civil rights and lack of resources to ensure fair housing compliance.

Enhance fair housing enforcement.

- Review local fair housing legislation and update as necessary to align with federal FHA.
- Conduct targeted testing for discrimination related to disability, race/ethnicity, and source of income.
- Contract with a HUD-approved Fair Housing organization to deliver fair housing education activities for county residents.

Need to increase fair housing training and access to information to residents, staff, and partners.

- Continue mandatory fair housing training for county staff, subrecipients, and any other entities the County may contract with under its entitlement program.
- Support fair housing training for landlords, property managers, real estate professionals and mortgage lenders by a HUD-approved Fair Housing organization and make the training mandatory for rental properties with housing code violations.
- Continue to develop fair housing marketing materials to be distributed at government offices and other public venues.
- Continue to publish contact information and referral information related to fair housing in local newspapers and periodically provide fair housing education programs in low- and moderate-income neighborhoods or communities such as publicly assisted housing or large apartment developments.

Section 2: Jurisdictional Background Data

Collier County, located in southwest Florida along the Gulf of Mexico, was incorporated by the Florida Legislature in 1923 from portions of Lee and Monroe counties. There are three municipalities within Collier County: Everglades City, Marco Island, and Naples, which is the County seat. In 2017, Collier County was ranked the 16th most populous county in Florida, with 1.7% of the state's total population. This percentage is anticipated to be maintained through 2040, based on state population projections.

A significant portion of the county is designated as Federal or State park land or conservation lands. Within the developable areas, the average population density has increased 44% since 2000, from 124.1 to 178.9 persons per square mile. Collier County is rich in geographic diversity, from the beaches to the Big Cypress National Preserve and Everglades National Park. Collier County's beaches, tropical climate, and rich geographic and biological diversity make it one of the premier tourism and retirement destinations within the US (County, Collier Parks, 2021).

Immokalee is an unincorporated area in Collier County. Originally known as Gopher Ridge by the Seminole and Miccosukee Indians, Immokalee means "My Home" in the Mikasuki language, and also in Miccosukee, Mikisúkî or Hitchiti-Mikasuki, a Muskogean language. The area is one of the major tomato growing centers in the United States. Immokalee is the center of the region's agriculture industry and home to many families who work the vast fields that produce a large amount of the United States' fresh produce (CRA, 2021).

The Immokalee area is an agricultural center of the county. It is in the northeast section of the county and is characterized by residential, commercial, and industrial development. A significant percentage of the affordable housing units available in Collier County are located in the Immokalee area. Habitat for Humanity development projects, such as Carson Lakes and Faith Landing, are built here, as are other affordable housing developments, including Hatcher's Preserve (Institute U. L., 2021).

The City of Naples is an incorporated municipality bordering the Gulf of Mexico on the west and the unincorporated Collier County urban area on the east. It is the cultural and activity center of Collier County. Naples measures just 14 square miles and has some of the highest housing costs in the country. The limited number of commercial areas consists primarily of retail centers and financial institutions (Institute U. L., 2021). In addition to its natural features, Naples is known for its world-class shopping and exceptional dining opportunities. Naples is one of the few Florida communities that offer adequate public access to beaches. Beachfront property is almost exclusively residential zoning; commercial uses are focused along U.S. 41 and in a number of upscale shopping districts within the community. Naples is a multifaceted community where the many residential opportunities include beachfront mansions, canal frontage manors, downtown villas, bungalows, and high-rise condominiums, disbursed between a cohesive blend of both older and newer developments (Naples, 2021).

The rural lands and the Estates area are located between the urban area and the more environmentally sensitive areas to the east. The Estates area is largely composed of platted, subdivided lots that range from about one acre to more than 20 acres. During the Florida Land Grab of the 1950s, land parcels were divided and sold, creating the largest subdivision in the world with tens of thousands of home sites. Designated as privately owned, single-family lots, the Estates area's commercial and retail opportunities are limited. West of the Estates are the rural lands, which are primarily farmland and environmentally sensitive areas that are designated for future cities and towns. The first town to be built in this area was Ave Maria. Once the project is built out, it will have up to 11,000 residences and 1.7 million square feet of

retail, office, and business park uses spread across its 4,000 acres. Ave Maria is located in eastern Collier County (Institute U. L., 2021).

Demographic Data

The Fair Housing Act prohibits discrimination in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing related activities. To appropriately identify strategies to address contributing factors that impact fair housing issues that limit a person’s ability to access safe and stable communities, there must be an examination of demographic data to determine how protected classes are impacted by historical and systemic discrimination in housing. The following protected classes are covered under the Fair Housing Act:

- | | |
|-----------------|-----------------|
| Race | Sex |
| Color | Familial Status |
| National Origin | Disability |
| Religion | |

Population

According to the 2019 Community Foundation of Collier County (CFCC) Vital Signs report, the county grew 17.4% between 2010-2018. (University, 2021) Table 1 provides population projections for Collier County, Immokalee, and Naples. The data indicates the county will experience growth over the next five years with Immokalee having the highest growth rate in the County. Figure 1 shows population growth for Collier County and Immokalee and Figure 2 shows population growth for Naples. All three are expected to growth through 2025.

Table 1: Population and Household Projections

	Collier County, FL	Immokalee	Naples
2020 Total Population	386,951	28,809	22,069
2025 Total Population	421,522	31,542	23,655
2020-2025 Population: Annual Growth Rate	1.73%	1.83%	1.40%
2020 Total Households	161,455	6,984	11,615
2025 Total Households	176,318	7,679	12,457

Source: ERSI Demographics

Figure 1: 2020-2025 Collier County Population Growth

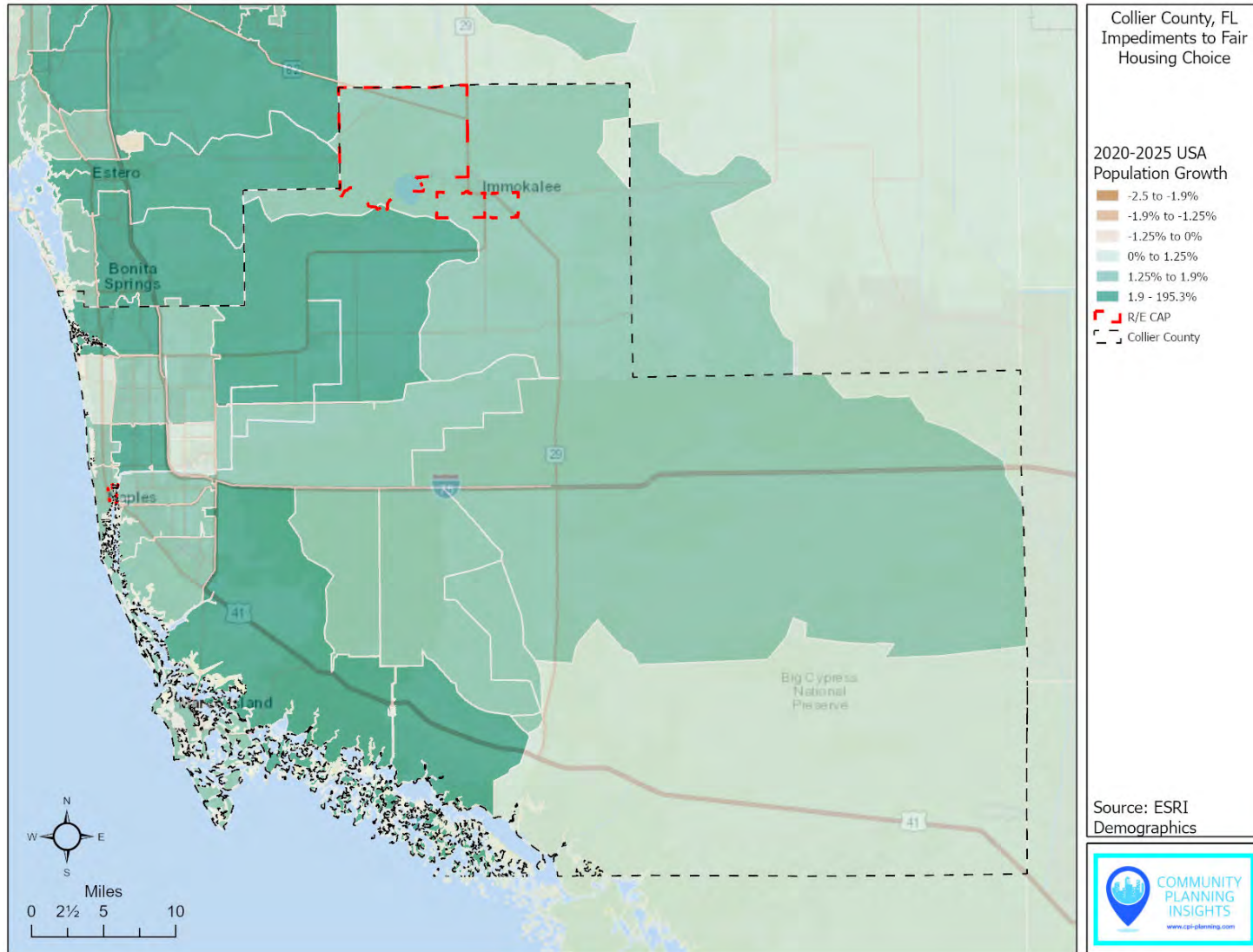


Figure 2: 2020-2025 Naples Area Population Growth

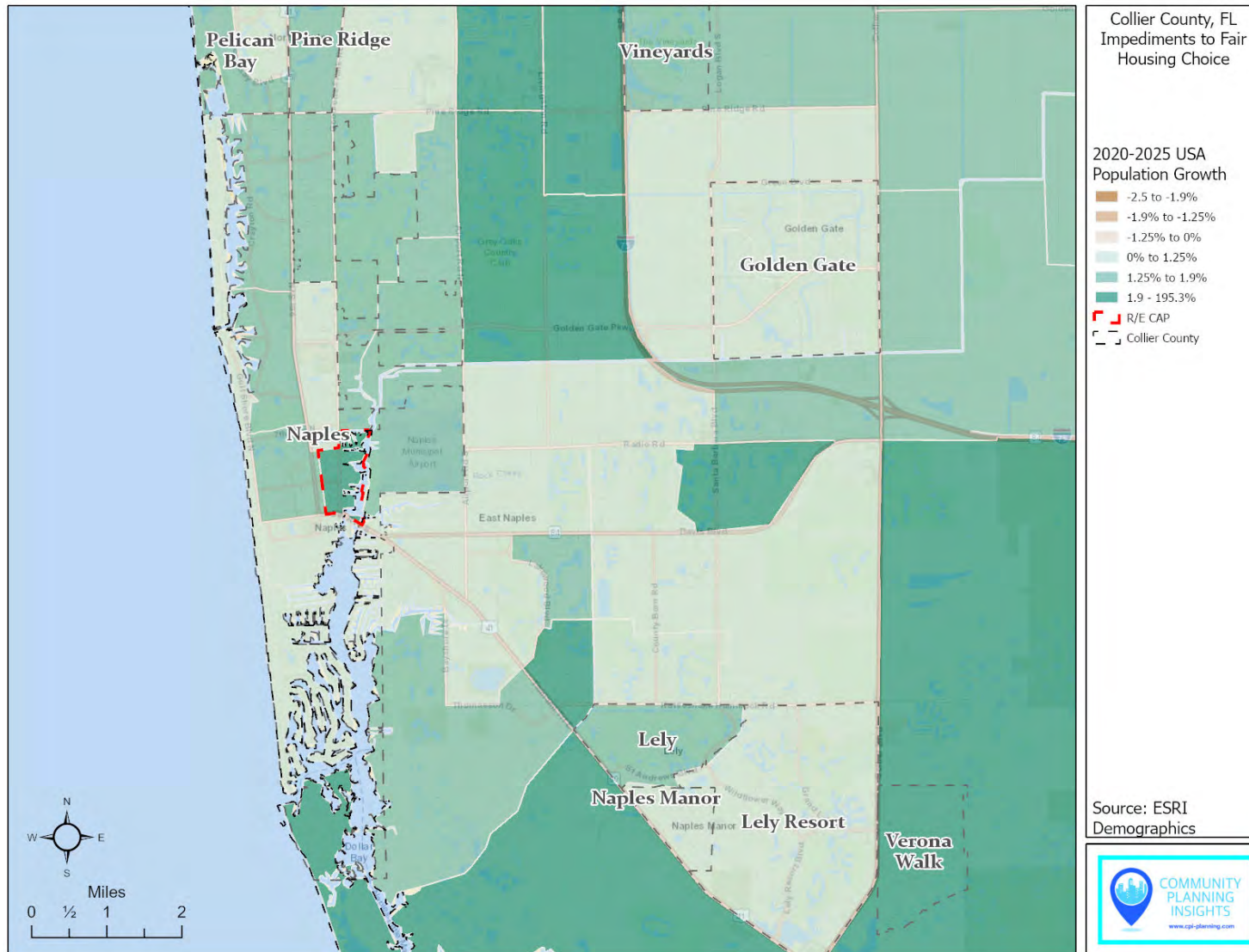


Table 2 provides population data by race and ethnicity. According to 2019 ACS 5–Year Estimates, Collier County and Naples is predominantly White, and Immokalee is predominantly Hispanic. Both Collier County and Immokalee have a significant minority population. Nearly 28% of Collier County’s population is Hispanic and over 72% of the Immokalee population is Hispanic and 21% of its residents are Black.

Figure 3 shows the concentration of Black households within the county and Figure 4 shows the concentration of Hispanics. The largest concentration of Blacks and Hispanics are located in Immokalee. The Hispanic population is the fastest growing population in the County at 20.2% compared to the state at 26.1% and the U.S. at 18.3% (University, 2021).

Table 2: Population by Race/Ethnicity

Race/Ethnicity	Collier County	Immokalee	Naples
Total Population	371,453	26,597	21,812
White	62.80%	5.00%	88.80%
Black/African American	6.80%	21.40%	4.50%
American Indian/Alaska	0.20%	1.30%	0.00%
Asian	1.30%	0.30%	0.80%
Native Hawaiian/Pacific Islander	0.00%	0.00%	0.00%
Other Race	1.50%	4.00%	0.40%
Population of Two or More Races	1.30%	1.50%	1.00%
Hispanic Population	27.90%	72.10%	4.80%

Source: 2019 ACS 5-Year Estimates

Figure 3: Black Population Concentration

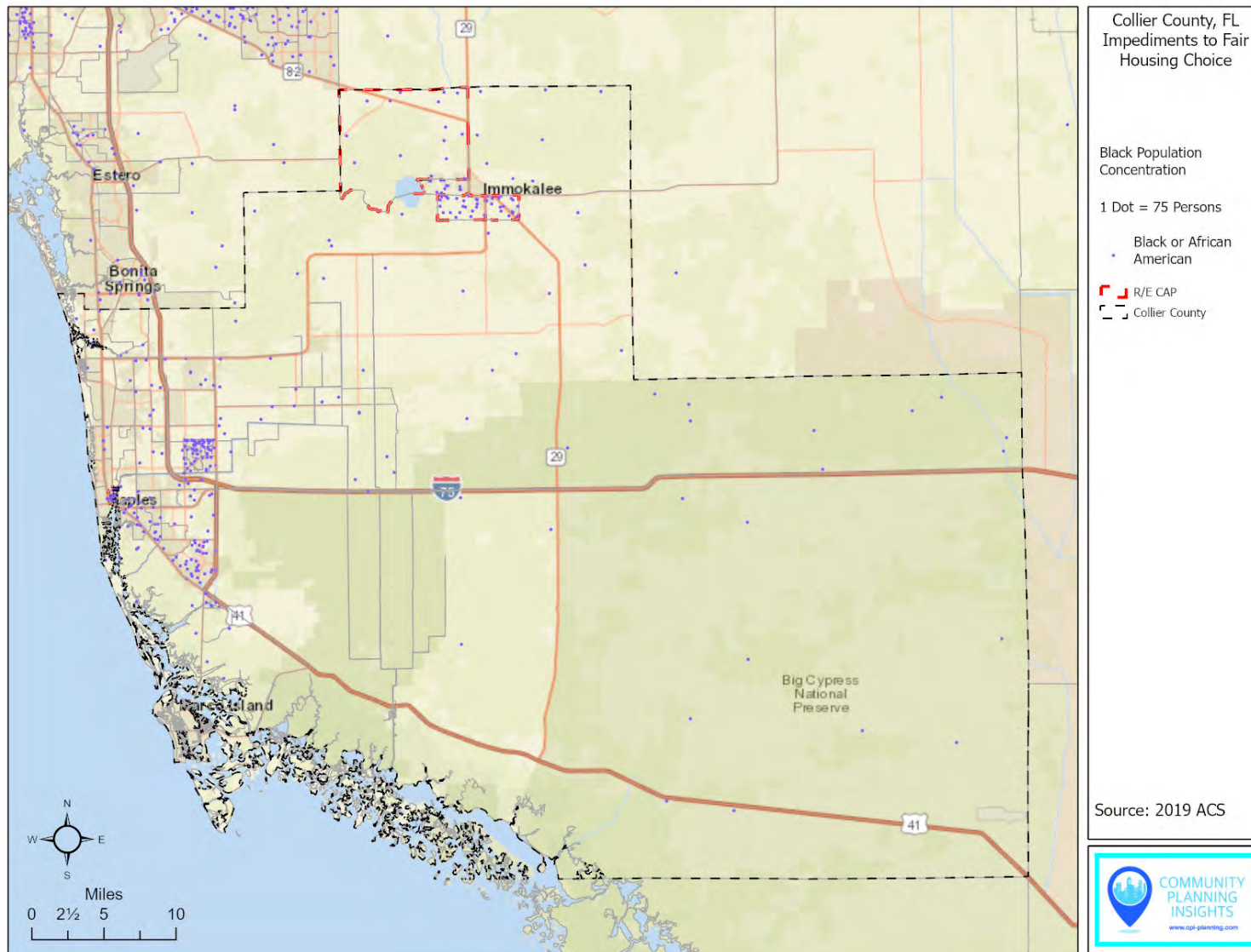
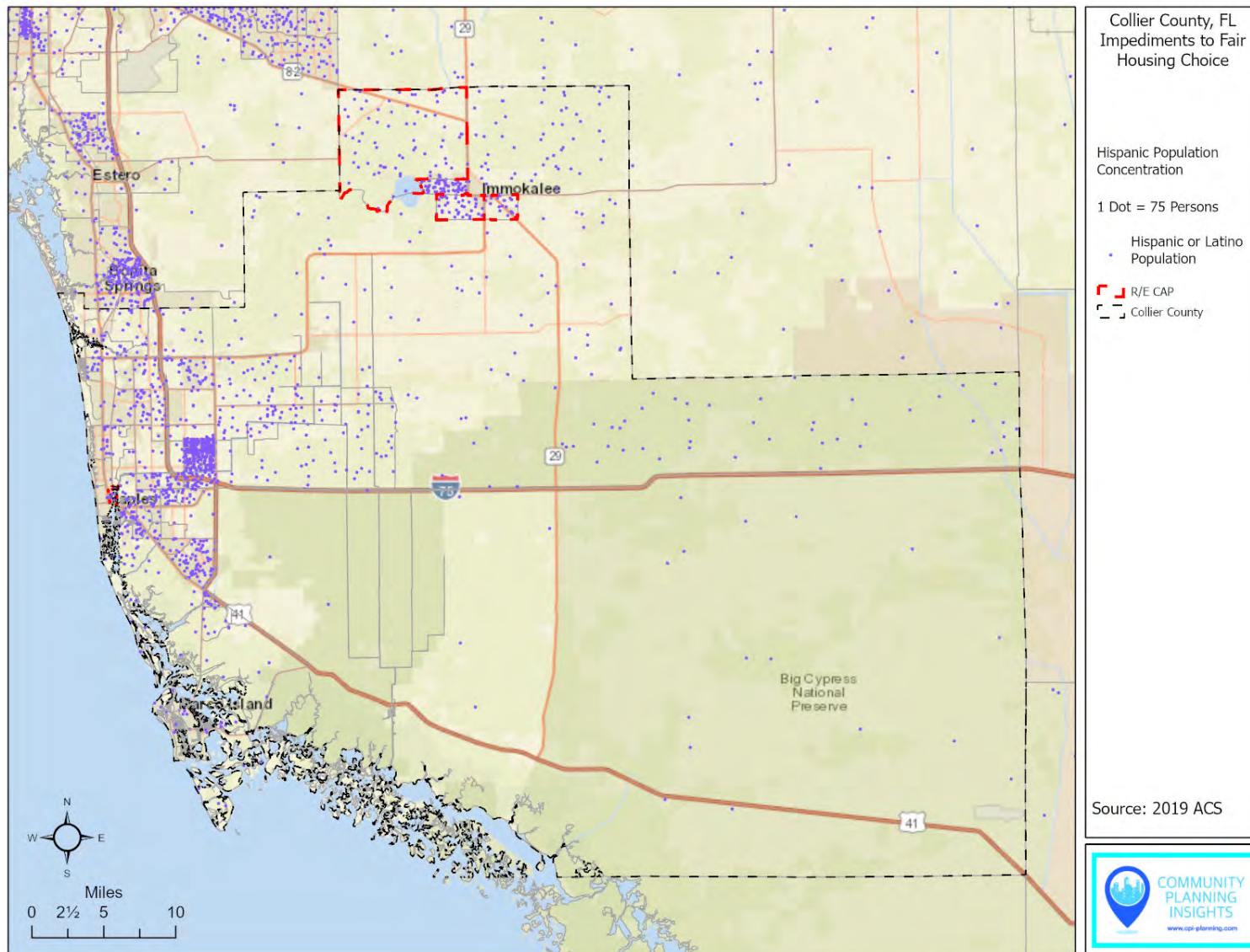


Figure 4: Hispanic Population Concentration



Dissimilarity

The Dissimilarity Index measures the percentage of a certain group’s population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the level of segregation. For example, if a city’s Black/White Dissimilarity Index was 65, then 65 percent of Black residents would need to move to another neighborhood in order for Blacks and Whites to be evenly distributed across all neighborhoods in that city.

Over the past 20 years, the White to Non-White Racial Dissimilarity Index has slightly improved in Collier County. In 2010, the dissimilarity estimate was 48.6, and in 2019, the estimate was 46.69.

Foreign Born Persons

Foreign born persons represented 25.39% of the Collier County population with an estimated 54% who are not citizens compared to 43.94% of Immokalee residents who are foreign born and 36.26% who are not citizens. There was no data for foreign born persons in Naples. The Census does not distinguish between those whose immigration status is lawful and those that are not, therefore the “Not a Citizen” category contains both groups. The significant percentage of residents that are not citizens could be concerning because policies in place that prevent resources for being spent to address the needs of residents residing without lawful immigration status.

Table 3: Foreign-Born Population

	Collier County		Immokalee		Naples	
Foreign-born Population	94,321	25.39%	11,686	43.94%	N/A	N/A
Naturalized citizen	43,087	45.68%	2,042	7.68%	N/A	N/A
Not a citizen	51,234	54.32%	9,644	36.26%	N/A	N/A

Source: 2019 ACS 5-Year Estimates

Of the population in Collier County over the age of 5, 33.7% speak a language other than English of which 14.9% speak English less than very well. This is higher than the percentage compared to the State and U.S.

In Immokalee, 80% of residents speak a language other than English of which 47.7% speak English less than very well. There are 28.3% limited English households in Immokalee compared to 6.6% in Collier County and 2.7% in Naples. Nearly 11% of Naples residents speak a language other than English with 38% speaking English less than very well. There are 23.7% of CCPS K-5 students enrolled in Limited English Proficient (LEP) classes (University, 2021).

Table 4: English Proficiency for Population Over 5

Language	Collier County		Immokalee		Naples	
	Count	Percentage	Count	Percentage	Count	Percentage
Language other than English	119,598	33.70%	19,509	80.00%	2,324	10.80%
Less than very well		44.20%		47.70%		38.00%
Limited English households	9,457	6.60%	1,694	28.30%	287	2.70%

Source: 2019 ACS 5-Year Estimates

Table 5: Limited English-Speaking Households

Language	Collier County		Immokalee		Naples	
	Language Spoken	Limited English	Language Spoken	Limited English	Language Spoken	Limited English
Total		6.60%		28.30%		2.70%
Spanish	18.40%	28.40%	65.80%	33.90%	3.70%	48.00%
Indo-European	7.80%	15.10%	16.50%	35.70%	6.90%	12.60%
Asian and Pacific Island	1.00%	20.90%	0.10%	0.00%	0.30%	0.00%
Other language	0.50%	4.50%	0.50%	24.10%	0.30%	0.00%

Source: 2019 ACS 5-Year Estimates

Age

The largest portion of the county's population is 65 and over. The CFCC Vital Signs report states that the 65 and over population is anticipated to represent 43.5% of the county by 2040 (University, 2021). Table 6 provides an overview of the percentage of the population that are children and the percentage of seniors who are 65 and over. The median age in Immokalee is significantly younger compared to median the age in Collier County and Naples, with Naples median age being significant older. Table 7 shows the median age of the population by gender.

Table 6: Population by Age

Age	Collier County		Immokalee		Naples	
	Count	Percentage	Count	Percentage	Count	Percentage
Under 5 years	16,683	4.50%	2,206	8.30%	324	1.50%
Under 18 years	64,594	17.40%	8,578	32.30%	1,764	8.10%
Over 65 years	117,197	31.60%	1,986	7.50%	11,453	52.50%

Source: 2019 ACS 5-Year Estimates

Table 7: Median Age of Population by Gender

Median Age	Collier County	Immokalee	Naples
Median age	50.80	29.3	66.00
Median age - Male	49.20	30	66.20
Median age - Female	52.30	28	65.80

Source: 2019 ACS 5-Year Estimates Subject Table

Gender

Table 8 shows slightly more females than males in Collier County.

Table 8: Population by Gender

Gender	Collier County		Immokalee		Naples	
Male	182,946	49.25%	14,022	52.72%	10,030	45.98%
Female	188,507	50.75%	12,575	47.28%	11,782	54.02%

Source: 2019 ACS 5-Year Estimates Subject Table

Households

According to the Census glossary, a householder is the person, or one of the people, in whose name the home is owned, being bought, or rented. A family householder is a householder living with one or more people related to him or her by birth, marriage, or adoption. The householder and all people in the household related to him are family members (Census, 2021).

There are two types of households: family (more than one related person) and non-family (singles, cohabitators). Total households include family and non-family. Table 9 provides an overview of households in Collier County and Table 10 provides an overview of family households.

There are twice as many female householders than male in all three areas. Apart from Naples, there are significantly more female householders with children under 18 compared to males. The average female household in Immokalee is larger compared to Collier County and Naples. This could be correlated to the younger median age of the population in Immokalee and women being in childbearing years.

Table 9: All Households

	Collier County	Immokalee	Naples
Total Households	142,979	5,985	10,797
Male Householder	4.06%	12.65%	1.76%
Female Householder	8.44%	25.26%	3.66%
Average Size	2.57	4.32	1.99
Male Householder Average Size	4.23	4.60	3.52
Female Householder Average Size	4.22	5.37	3.95
Households with own children under 18	19.54%	45.35%	7.49%
Male householder with child under 18	2.15%	9.02%	0.85%
Female householder with child under 18	4.53%	15.69%	0.98%
Householders 65 and living alone	15.90%	3.60%	24.50%

Source: 2019 ACS 5-Year Estimates

Table 10: Collier County Family Households

	Collier County	Immokalee	Naples
Total Family Households	97,555	4,517	6,441
Average Family Size	3.05	4.57	2.51

Source: 2019 ACS 5-Year Estimates

Disability

The Census defines disability as a long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. The condition can also impede a person from being able to go outside the home alone or work at a job or business. The ACS attempts to capture six aspects of disability (hearing, vision, cognitive, ambulatory, self-care, and independent living), which can be used together to create an overall disability measure, or independently to identify populations with specific disability types.

In the American Housing Survey (AHS), a person with a **hearing** disability is deaf or has a hearing impairment that makes it very difficult to hear conversation, televisions, or radio broadcasts. A person with a **vision** disability is blind or has serious difficulty reading or driving due to a visual impairment even when wearing glasses. A **cognitive** disability results from a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions. An **ambulatory** disability is having serious difficulty walking or climbing. A person with a **self-care** disability has serious difficulty dressing or bathing oneself. An **independent living difficulty** results from a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping (Census, 2021).

According to 2019 ACS 5-Year Estimates, 11.5% of the total population in Collier County has a disability compared to 6.3% in Immokalee and 14.1% in Naples. As noted in Table 11, ambulatory, independent living difficulty, and hearing are the leading disabilities. The lower percentage of disability in Immokalee could be due to the median age of the population being younger.

Table 11: Disability by Category

	Collier County	Immokalee	Naples
Population	369,593	26,597	21,538
Type of Disability	% of Population	% of Population	% of Population
Overall	11.5%	6.30%	14.10%
Hearing	4.3%	1.30%	6.70%
Vision	2.0%	1.60%	2.80%
Cognitive	3.5%	3.00%	3.00%
Ambulatory	6.0%	3.90%	6.60%
Self-care Difficulty	2.2%	1.40%	2.40%
Independent Living Difficulty	4.4%	2.60%	5.00%

Source: 2019 ACS 5-Year Estimates

Table 12: Collier County Disability by Race / Ethnicity

Race/Ethnicity	Collier County	Immokalee	Naples
Total	11.5%	6.3%	14.1%
White	14.70%	18.70%	14.90%
Black	5.50%	8.10%	5.80%
American Indian and Alaska Native	13.50%	2.60%	0.00%
Asian	8.10%	0.00%	1.70%
Native Hawaiian and Other Pacific Islander	0.00%	0.00%	0.00%
Other Race	6.40%	3.20%	0.00%
Two or More Races	11.60%	22.70%	5.30%
Hispanic	6.00%	4.60%	10.80%

Source: 2019 ACS 5-Year Estimates

Table 13: Disability by Gender

	Collier County	Immokalee	Naples
Male	11.7%	5.40%	14.70%
Female	11.4%	7.20%	13.70%

Source: 2019 ACS 5-Year Estimates

Visitability

With the population in the county and Naples aging, consideration for visitability is beneficial to ensuring residents can age in place. According to Visitability.org, visitability refers to a single-family or owner-occupied housing designed in such a way that it can be lived in or visited by people who have trouble with steps or who use wheelchairs or walkers. A house is visitable when it meets three basic requirements:

- One zero-step entrance
- Doors with 32 inches of clear passage space
- One bathroom on the main floor you can get into in a wheelchair

Visitability focuses on laws and policies. Since there is typically little additional cost to visitability design standards, the most desirable do not include a financial cost to meet the standards (Living, 2021).

Mental Health and Addiction Services

In December of 2018, the Collier County Board of County Commissioners established the Mental Illness and Addiction Ad Hoc Advisory Committee. The Advisory Committee was charged with developing a five-year strategic plan that makes recommendations regarding the County's role in providing assistance and treatment of adults with mental health and substance use disorders. The committee developed a report that identified six priorities ranked in the order of their relative importance. Included in those priorities was a recommendation to increase housing and supportive services for persons with serious mental illness and/or substance dependence.

Due to low incomes (typically less than \$800 per month), discrimination, and difficulties in daily functioning, persons with serious mental illnesses and substance use disorders generally cannot compete for market rental housing. Additionally, affordable housing units and supported housing programs have long wait lists and few in need can access them.

The report identified two goals to increase housing and supportive services for persons with serious mental illness and/or substance dependence: However, in order to accomplish the goals related to housing and the those identified in the report, it was noted that the County must allocate the appropriate funding levels. The two goals were:

- Increase availability and accessibility of a variety of housing options and supportive services for persons with mental health and substance use disorders.
- Increase availability and accessibility of a variety of housing options and supportive services for persons with mental health and substance use disorders (Committee, 2021).

Education

Table 14 provides educational attainment by gender. In Collier County, there is a higher percentage of females that complete high school. However, a higher percentage of males obtain a bachelor’s degree. In Immokalee, females have higher educational attainment overall. In Naples, males and females have the same level of high school completion. However, a significantly higher percentage of males have a bachelor’s degree.

Table 14: Collier County Educational Attainment by Gender

	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Population Over 25	282,120	136,903	145,217	14,931	7,941	6,990	19,292	8,702	10,590
Less than high school	12.90%	14.40%	11.40%	60.00%	64.40%	54.80%	4.60%	4.90%	4.50%
High School (includes equivalency)	25.80%	24.50%	27.20%	24.30%	23.00%	25.80%	15.90%	10.50%	20.30%
Some College/Associates	24.90%	15.60%	18.30%	7.80%	6.10%	9.80%	16.10%	13.30%	18.50%
Associates		6.70%	9.10%	2.70%	1.80%	3.70%	6.70%	6.20%	7.10%
Bachelor's	21.05%	22.10%	20.90%	4.30%	3.60%	5.20%	32.20%	33.70%	31.00%
Graduate/Professional	14.90%	16.80%	13.20%	0.90%	1.10%	0.70%	24.50%	31.50%	18.70%
High School or Higher	87.10%	85.60%	88.60%	40.10%	35.60%	45.20%	95.30%	95.20%	95.50%
Bachelors or Higher	36.40%	38.90%	34.10%	5.20%	4.70%	5.90%	56.70%	65.20%	49.70%

Source: 2019 ACS 5-Year Estimates

Table 15 provides educational attainment by race and ethnicity. There is a disparity among all races and ethnicities when compared to Whites. However, Blacks and Hispanics show a significant disparity in educational attainment. Immokalee has a significant percentage of the population with less than a high school education.

Table 15: Educational Attainment by Race and Ethnicity

		White	Black	American Indian/ Alaskan	Asian	Some Other	Two or More Races	Hispanic
Collier County	HS or Higher	95.40%	69.60%	73.50%	83.80%	59.70%	80.10%	65.60%
	BS or Higher	44.60%	14.80%	20.70%	51.10%	12.80%	34.30%	14.90%
Immokalee	HS or Higher	79.90%	45.40%	70.70%	100.00%	31.10%	71.90%	33.00%
	BS or Higher	11.00%	8.50%	16.20%	84.20%	3.70%	17.20%	2.70%
Naples	HS or Higher	97.50%	62.00%	100.00%	100.00%	100.00%	100.00%	65.80%
	BS or Higher	58.90%	14.00%	100.00%	95.80%	42.60%	48.20%	29.00%

Source: 2019 ACS 5-Year Estimates

Income

Income is the gauge used to determine the well-being of the population. It also provides an indication of how well the County can meet the needs of its residents. Income is the sum of the amounts reported separately for wage or salary income; net self-employment income; interest, dividends, or net rental or royalty income or income from estates and trusts; Social Security or Retirement income; Supplemental Security Income (SSI); public assistance or welfare payments; retirement, survivor, or disability pensions; and all other income. Therefore, income does not reflect the fact that some families receive part of their income in the form of noncash benefits, such as food stamps, health benefits, subsidized housing, and goods produced and consumed on the farm (Census, 2021).

According to NLIHC, the Florida Department of Economic Opportunity (FDEO), and other agencies “Six of the seven occupations projected to add the greatest number of jobs by 2024 provide a median wage that is not sufficient to afford a modest one-bedroom rental home.” According to the FDEO, Bureau of Labor Market Statistics, in 2013, 80.5% of the jobs in Collier County paid less than 80% of the area median income.

Three years later, in 2016 that increased to 87.7% (County, 2017 Community Housing Plan, 2021). Since 2010, the average annual pay in Collier County has been below Florida average annual pay. During the same timeframe, average weekly pay was also below state average (University, 2021).

Table 16: Income by Household

Income Level	Collier County	Immokalee	Naples
Total Households	142,979	5,995	106,918
Less than \$10,000	4.10%	7.80%	4.10%
\$10,000 - \$14,999	3.10%	9.00%	2.70%
\$15,000 - \$24,999	7.40%	20.50%	7.20%
\$25,000 - \$34,999	8.70%	19.20%	8.70%
\$35,000 - \$49,999	12.10%	15.10%	12.40%
\$50,000 - \$74,999	17.10%	15.60%	17.50%
\$75,000 - \$99,000	12.90%	5.30%	13.20%
\$100,000 - \$149,999	14.80%	5.40%	14.80%
\$150,000 - \$199,999	7.50%	0.90%	7.50%
\$200,000 - or greater	11.90%	1.20%	11.90%
Median Income	\$69,653	\$30,885	\$70,061

Source: 2019 ACS 5-Year Estimates

Median household income refers to the income level earned by a given household where half of the households in the geographic area of interest earn more and half earn less. Table 17 shows the percentage of households in various income ranges by family type (Census, 2021).

Female householders experience income inequality when compared to males. This is exacerbated when there is a child in the household.

Table 17: Median Income by Family Type

Family Type	Collier County	Immokalee	Naples
Families	\$82,092.00	\$30,636.00	\$156,362.00
Families w/ own Children	\$60,104.00	\$27,478.00	\$107,961.00
3-Person Families	\$75,932.00	\$27,870.00	\$128,603.00
4 Person Families	\$72,759.00	\$40,605.00	\$143,000.00
Married	\$94,538.00	\$38,750.00	\$169,007.00
Married w/ own children	\$81,615.00	\$39,161.00	\$128,523.00
Female Head	\$40,630.00	\$23,178.00	\$47,083.00
Female Head w/ own Children	\$31,383.00	\$21,103.00	\$19,091.00
Male Head	\$48,900.00	\$30,279.00	\$93,036.00
Male Head w/ own Children	\$42,791.00	\$29,762.00	\$86,250.00

Source: 2019 ACS 5-Year Estimates

Income Inequality

Income inequality in a community can accentuate differences in social class and status and serve as a social stressor. Communities with greater income inequality can experience a loss of social connectedness, as well as decreases in trust, social support, and a sense of community for all residents. Income inequality is defined as households with income at the extremes of the national income distribution (the bottom 20%, the top 80%). A higher inequality ratio indicates greater division between the top and bottom ends of the income spectrum. A score of 0 would indicate equity in income distribution. A score less than 0 indicates that more families are represented at the lower end of the income spectrum, while a score above 0 indicates more families are represented in the higher end of the spectrum. Less income could indicate less access to high opportunity neighborhoods with better quality housing. A higher income inequality ratio indicates greater division between the top and bottom ends of the income spectrum. According to the national County Health Rankings and Roadmaps, Collier County has an income inequality score of 4.8 meaning more residents are represented at the higher end of the income spectrum or top 80%. (Institute U. o., 2021).

Income inequality in the county is a cause for concern. Collier County represents the second most unequal metro area in Florida with respect to income. The CFCC Vital Signs report indicated that the top 1% in the area makes 90.1 times more than the bottom 99%. According to the report, the average income of the top 1% in Collier County is \$5,590,120. The average income of the bottom 99% is \$62,053. The county median income is \$69,653 (University, 2021). The ratio of top 1% income to bottom 99% income is 73.2 making it the 8th ranked

county in the US with respect to income inequality. Only Franklin County in FL has a wider income gap (ratio of 73.4).

There is significant household income inequality in Immokalee compared to the rest of the county. Blacks and people of two or more races have the most significant household income disparity. In Naples, Hispanic household income is less than 10% of White households.

Table 18: Income by Race and Ethnicity

Race/Ethnicity	Collier County	Immokalee	Naples
All	\$69,653.00	\$30,885.00	\$107,013.00
White	\$79,503.00	\$31,908.00	\$120,216.00
Black/African American	\$45,634.00	\$28,072.00	-
American Indian/Alaska	\$57,708.00	\$44,833.00	-
Asian	\$86,250.00	-	\$250,000.00
Native Hawaiian and Pacific Islander	-	-	-
Other Race	\$51,699.00	\$34,138.00	\$80,917.00
Population of Two or More Races	\$105,364.00	\$26,442.00	\$66,875.00
Hispanic Populations	\$49,871.00	\$31,455.00	\$11,429.00

Source: 2019 ACS 5-Year Estimates

Table 19: Individual Income by Gender

	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Population Over 25	174,444			19,555			7,920		
Less than high school	\$32,477	\$38,160	\$29,003	\$19,610	\$22,007	\$16,710	\$57,214	\$69,393	\$43,649
High School (includes equivalency)	\$21,422	\$24,716	\$16,337	\$16,712	\$19,933	\$13,517	\$17,969	\$25,341	\$15,313
Some College/Associates	\$29,555	\$31,787	\$22,131	\$24,096	\$26,156	\$20,890	\$29,293	\$32,417	\$22,031
Associates	\$35,613	\$42,860	\$30,204	\$25,608	\$26,146	\$25,099	\$42,949	\$55,054	\$35,481
Bachelor's	\$48,606	\$59,263	\$41,648	\$19,555	\$18,954	-	\$71,563	\$102,578	\$62,614
Graduate/Professional	\$66,465	\$82,552	\$55,401	\$49,191	\$48,897	\$52,813	\$95,750	\$116,964	\$80,093

Source: 2019 ACS 5-Year Estimates

Public Assistance

Public assistance refers to assistance programs that provide either cash assistance or in-kind benefits to individuals and families from any government entity. There are two major types of public assistance programs: social welfare programs and social insurance programs. Benefits received from social welfare programs are usually based on low income means test eligibility criteria. Programs include Supplemental Security Income (SSI), Supplemental Nutrition Assistance Program (SNAP), Special Supplemental Nutrition Program for Women Infants and Children (WIC), Temporary Assistance for Needy Families (TANF) including Pass through Child Support, and General Assistance (GA). Benefits received from social insurance programs are usually based on eligibility criteria such as age, employment status, or being a veteran. Programs include social security, Department of Veterans' Affairs benefits, unemployment insurance compensation, and worker's compensation. Retirement income is based on the employee and/or the employer's contributions to the employee's individual account that are invested on the employee's behalf and depend on investment performance. Table 20 shows the various types of income received by residents of Collier County (Census, 2021).

Retirement Income includes payments people receive from eight sources: companies or unions; federal government (Civil Service); military; state or local governments; railroad retirement; annuities or paid-up insurance policies; individual retirement accounts (IRAs), Keogh, or 401(k) payments; or other retirement income. (Census, 2021)

Social security income includes social security pensions and survivors' benefits and permanent disability insurance payments made by the Social Security Administration prior to deductions for medical insurance. The Census Bureau does not include Medicare reimbursements for health services as social security benefits. (Census, 2021)

Table 20: Type of Income by Household

	Collier County		Immokalee		Naples	
Wages or Salary	84,919	59.40%	5270	88.10%	4,607	42.70%
Self-employment	16,731	11.70%	396	6.60%	1,236	11.40%
Interest, Dividends, Rental Income	53,209	37.20%	310	5.20%	6,316	58.50%
Social Security	69,966	48.90%	1206	20.20%	6,617	61.30%
Supplemental Security Income (SSI)	4,048	2.80%	299	5.00%	302	2.80%
Cash Public Assistance	1,236	0.90%	99	1.70%	49	0.50%
Food Stamps/SNAP	10,817	7.60%	2,352	39.30%	361	3.30%
Retirement	40,825	28.60%	286	4.80%	3,205	29.70%
Other Types of Income	13,357	9.30%	479	8.00%	916	8.50%

Source: 2019 ACS 5-Year Estimates

Poverty

If the income of a family or an individual is below the official poverty threshold, then that family or individual is in poverty. The poverty threshold follows the Office of Management and Budget (OMB) set of income thresholds that vary by family size and composition to determine who is in poverty. (Census, 2021) Table 21 shows the 2021 poverty threshold by size of family household size.

The average household size in Collier County is 2.57 and 4.23 and 4.22 for male and female householders, respectively. The 2019 median family income is \$69,653. The average household size in Immokalee is 4.32 and 4.6 and 5.37 for male and female householders, respectively. The median family household income is \$30,885. The average household size in Naples is 1.99 and 3.52 and 3.95 for male and female householders, respectively. Considering the poverty thresholds based on household size, the average size of household and median income indicates that the average family lives in poverty.

Table 21: 2021 Poverty Thresholds

PERSONS IN FAMILY/HOUSEHOLD	POVERTY GUIDELINE
For families/households with more than 8 persons, add \$4,540 for each additional person.	
1	\$12,880
2	\$17,420
3	\$21,960
4	\$26,500
5	\$31,040
6	\$35,580
7	\$40,120
8	\$44,600

Source: 2021 Health and Human Services Federal Poverty Guidelines

The ratio of income to poverty has 6 categories, which range from under 0.50 to 2.00 and over. A ratio less than 1 means that the income is less than the poverty level. When the ratio equals 1, the income and poverty level are the same, and when the ratio is greater than 1, the income is higher than the poverty level. The income and poverty levels are used to determine eligibility for various programs. (Census, 2021) Table 22 shows the ratio of income to poverty level for Collier County.

Table 22: Ratio of Income to Poverty Level

	Collier County		Immokalee		Naples	
Total:	367,773	4.4%	26,354	15.4%	21,523	3.3%
Under .50	16,220	6.8%	4,057	22.0%	709	4.6%
.50 to .99	25,023	3.9%	5,789	12.4%	985	1.7%
1.00 to 1.24	14,383	4.5%	3,281	10.0%	361	1.9%
1.25 to 1.49	16,598	6.8%	2,624	11.6%	402	3.7%
1.50 to 1.84	24,937	3.3%	3,061	4.1%	805	1.2%
1.85 to 1.99	11,994	70.3%	1,069	24.6%	248	83.7%
2.00 and over	258,618	4.4%	6,473	15.4%	18,013	3.3%

Source: 2019 ACS 5-Year Estimates

Table 23 illustrates poverty by race and ethnicity. The percentage of residents in poverty is disproportionately higher in Immokalee. While this is an area of Collier County with a concentration of minorities, poverty is high for all races. In Collier County and Naples, poverty is disproportionately higher for racial and ethnic minorities.

Table 23: Poverty Rate by Race/Ethnicity

Race/Ethnicity	Collier County	Immokalee	Naples
Total Population*	367,773	26,354	21,523
All	11.20%	37.40%	7.90%
White	6.90%	33.50%	5.20%
Black/African American	16.30%	33.20%	31.00%
American Indian/Alaska	26.50%	47.70%	0.00%
Asian	5.00%	0.00%	9.40%
Native Hawaiian/Pacific Islander	0.00%	0.00%	0.00%
Other Race	20.20%	37.30%	0.00%
Population of Two or More Races	8.20%	2.90%	5.10%
Hispanic Populations	20.20%	39.20%	37.20%

*Total population for whom poverty status is determined

Source: 2019 ACS 5-Year Estimates

Figure 5: Collier County Poverty Rate

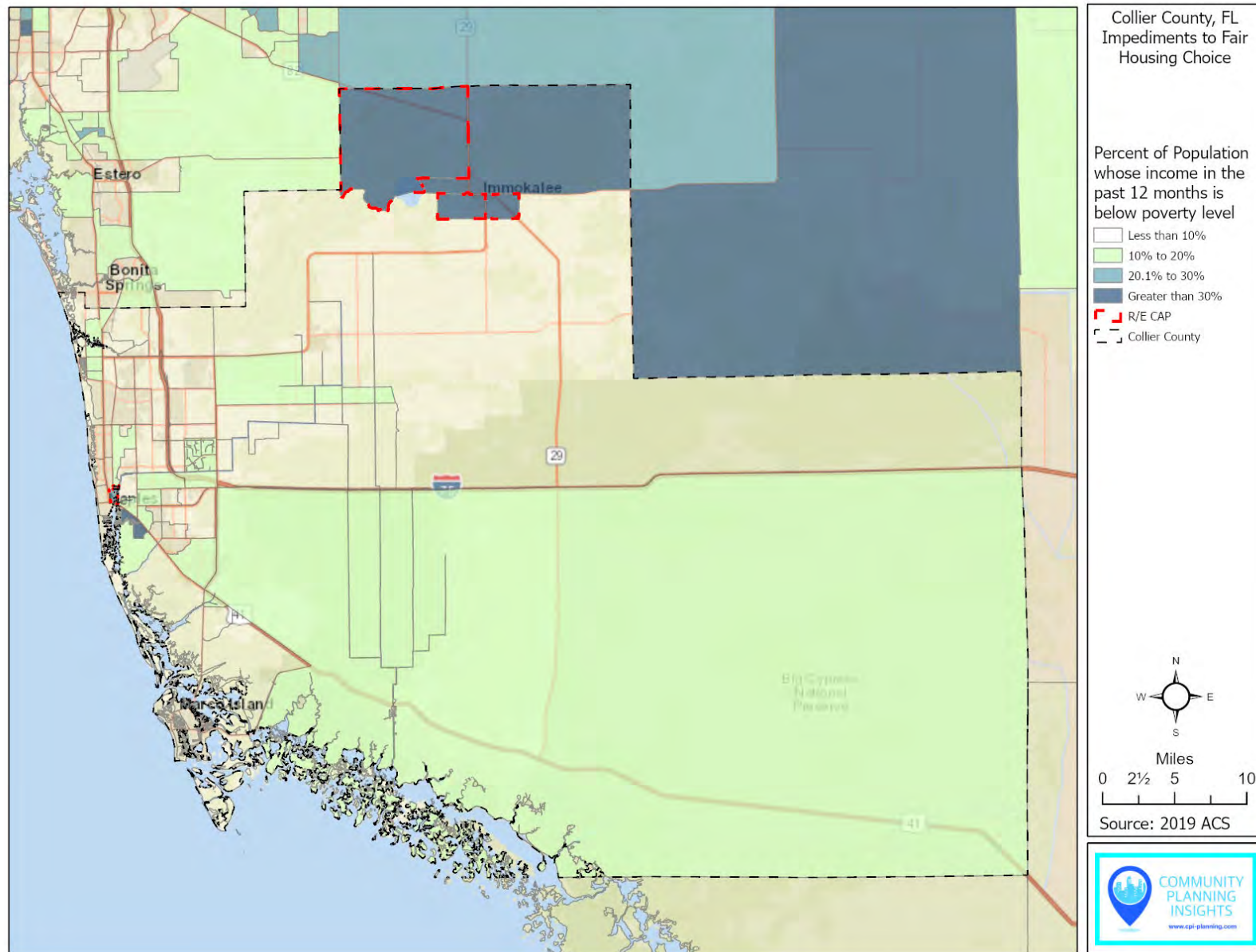
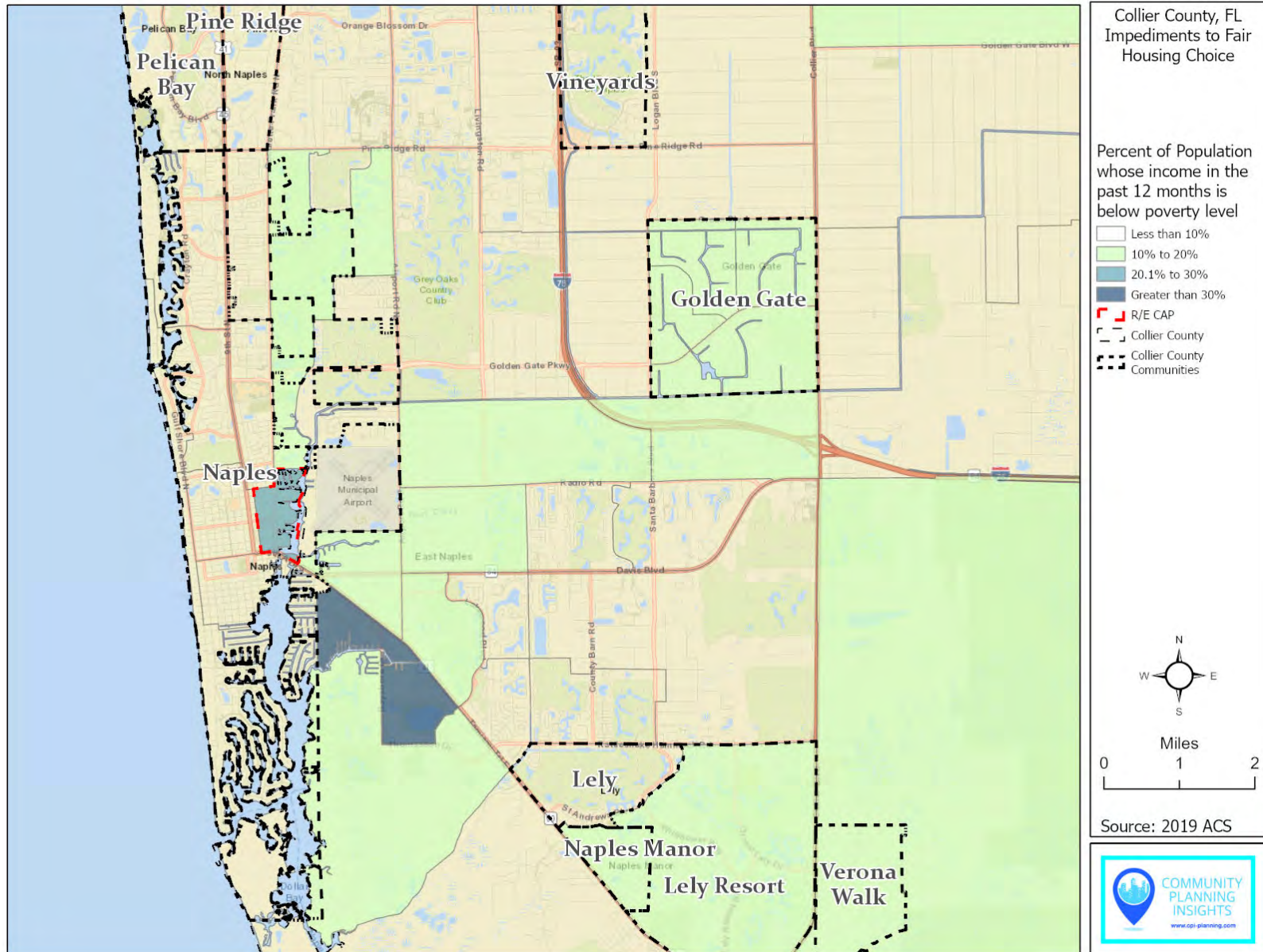


Figure 6: Naples Area Poverty Rate



The average monthly social security benefit for women in Collier County is \$1,235 compared to \$1,696 for men. There are twice as many women living alone compared to men in the County (University, 2021).

Table 24: Poverty by Gender

Gender	Collier County	Immokalee	Naples
Male	10.80%	34.60%	6.50%
Female	11.70%	40.40%	9.00%

Source: 2019 ACS 5-Year Estimates

Table 25: Poverty by Age

Age	Collier County	Immokalee	Naples
Under 18	19.50%	46.90%	10.30%
Under 5	20.30%	46.80%	7.00%
5-17 years	19.20%	46.90%	11.10%
18 - 64 years	11.40%	33.90%	8.80%
18 - 34 years	13.30%	31.80%	14.40%
35 - 64 years	10.50%	35.40%	7.20%
65 years and over	6.40%	25.70%	6.80%

Source: 2019 ACS 5-Year Estimates

Racially/Ethnically Concentrated Areas of Poverty

Figure 7 and Figure 8 shows Racially and Ethnically Concentrated Areas of Poverty (R/ECAP). The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is a non-white population of 50% or more. The poverty threshold for a neighborhood is one that has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

There are four R/ECAPs in Collier County. Three are in or around Immokalee and one in Naples. This number has remained steady since 1990. The three R/ECAPs in Immokalee have had this designation since 1990. The R/ECAP in Naples had the designation in 1990, 2000 Census, and is currently designated as a R/ECAP by HUD.

Figure 7: Collier County R/ECAPs

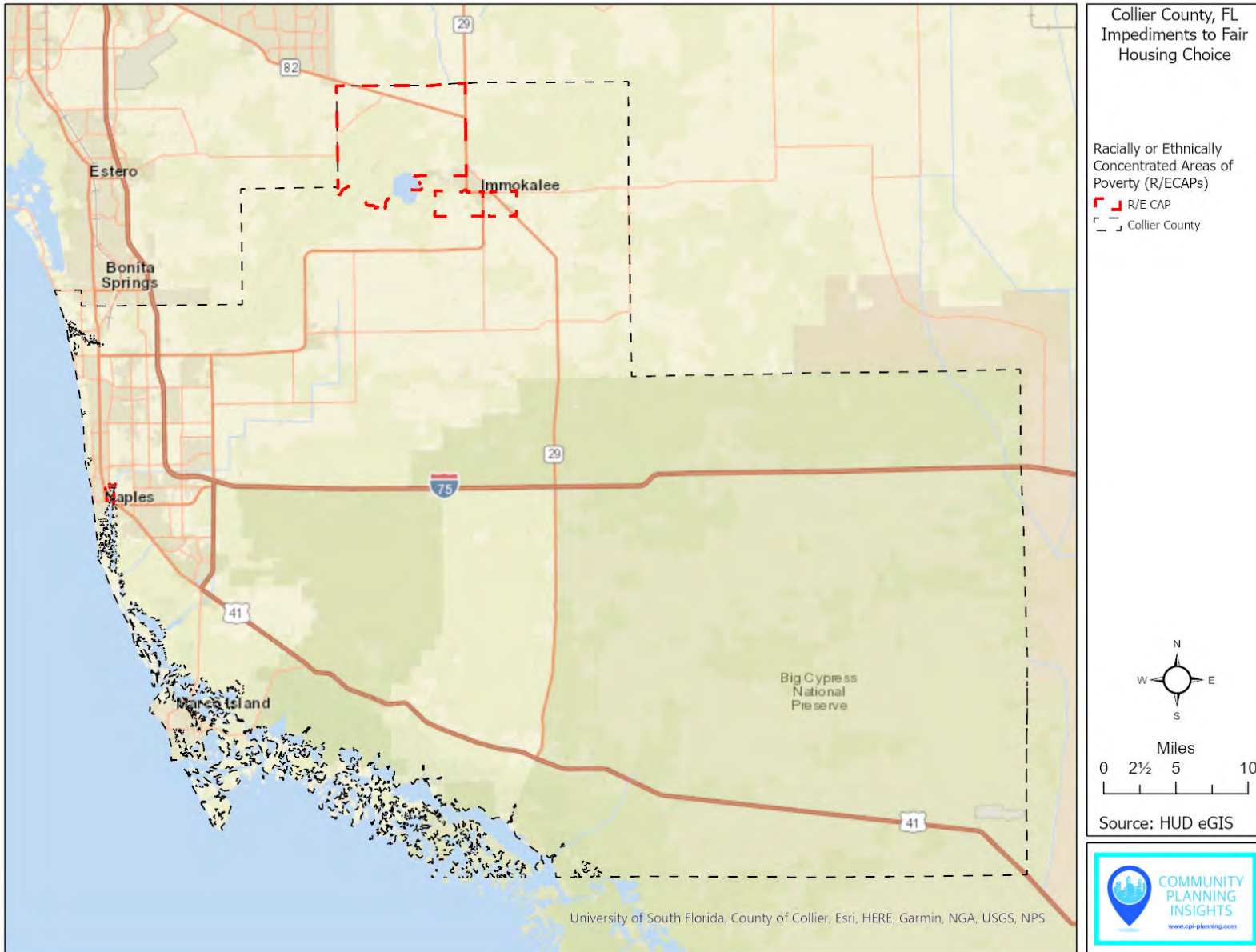
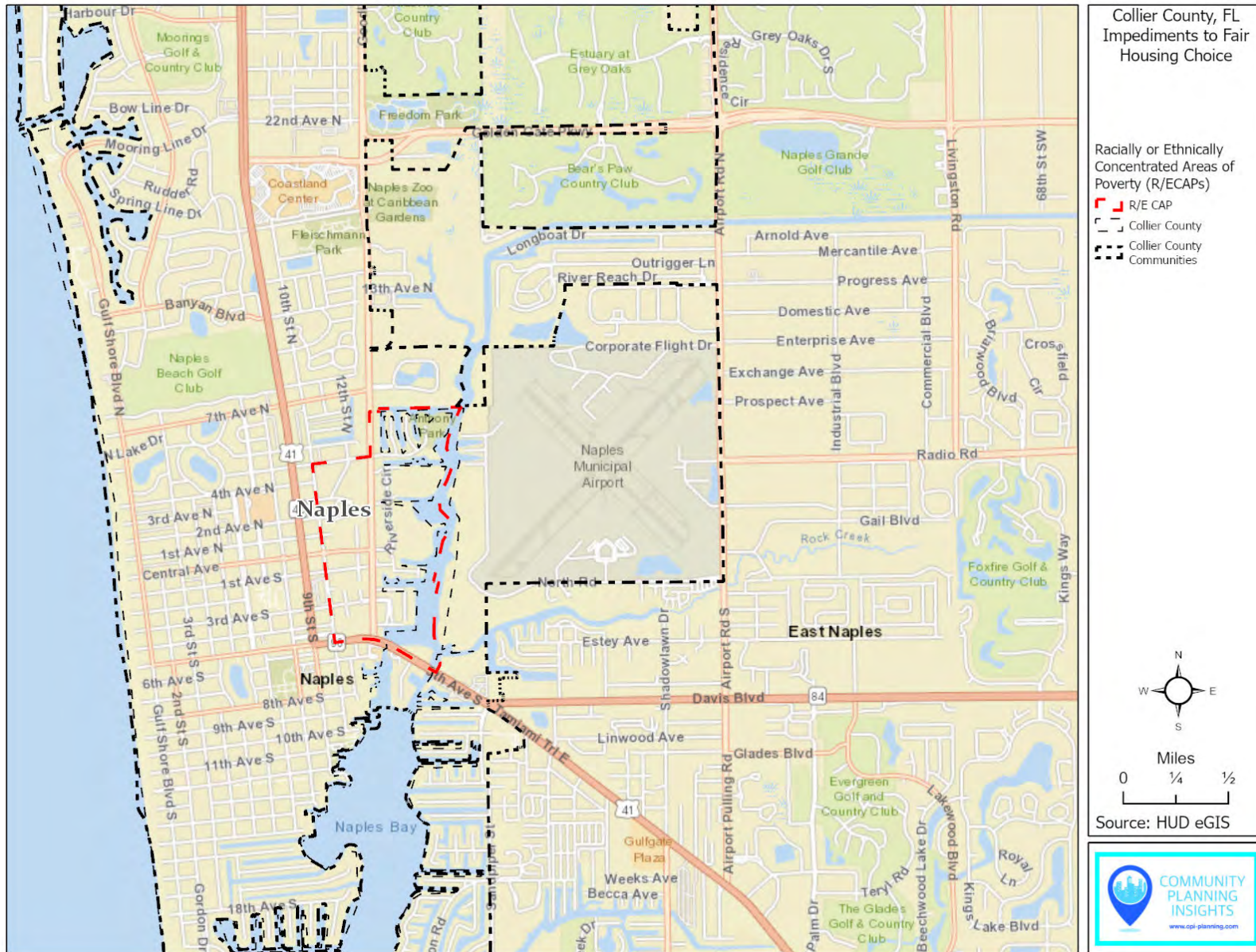


Figure 8: Naples Area R/ECAP's



Employment

The labor force participation rate is the proportion of the working-age population that is either working or actively looking for work. This rate is an important labor market measure because it represents the relative amount of labor resources available for the production of goods and services. Though subject to some cyclical influences, labor force participation is primarily affected by longer-term structural changes. These might include changes in the age composition of the population, school enrollment and educational attainment, employer-provided pensions, or Social Security benefits. (Census, 2021)

Table 26: Labor Force Participation by Race/Ethnicity

	Collier County	Immokalee	Naples
Race/Ethnicity	% of Population	% of Population	% of Population
Total	52.50%	68.20%	36.00%
White	43.60%	57.80%	33.90%
Black	67.80%	64.10%	63.80%
American Indian and Alaska Native	47.90%	31.10%	0.00%
Asian	52.10%	92.10%	61.70%
Native Hawaiian/Pacific Islander	100.00%	0.00%	0.00%
Some other race alone	71.90%	72.70%	54.80%
Two or more races	64.50%	58.40%	62.50%
Hispanic	73.10%	70.60%	47.10%

Source: 2019 ACS 5-Year Estimates

The high percentage of children in correlates to the higher percentage of women in poverty. Women are more likely to be single mothers than men are to be single fathers, a driving factor of the gender differential in rates of poverty. In addition, among parents with children younger than age 6, 25% of mothers work part-time, and 55% are not in the labor force compared with just 4% and 5% of fathers, respectively (Robin Bleiweis, 2021).

Table 27: Labor Force Participation by Gender

Gender	Collier County	Immokalee	Naples
Male	84.70%	87.20%	79.70%
Female	70.90%	66.00%	59.40%
Female w/ Children	73.70%	62.60%	78.50%
Female w/ Children Under 6	69.70%	74.40%	86.20%

Source: 2019 ACS 5-Year Estimates

Roughly one in four households are in at risk of a single financial emergency tipping them into poverty (University, 2021). The MIT Living Wage model generates a cost-of-living estimate that exceeds the federal poverty thresholds. As calculated, the living wage estimate accounts for basic needs of a family. The living wage is the minimum income standard that, if met, draws a very fine line between the financial independence of the working poor and the need to seek public assistance or suffer consistent and severe food insecurity. (Technology, 2021) Table 28 provides the living, poverty, and minimum wage amounts for Collier County.

Table 28: Collier County Living Wage Calculator

	1 Adult			2 Adults (1 Working)			2 Adults (Both Working)		
	Number of Children			Number of Children			Number of Children		
	None	One	Two	None	One	Two	None	One	Two
Living Wage	\$12.53	\$26.47	\$30.80	\$20.55	\$25.19	\$27.56	\$10.27	\$14.49	\$16.64
Poverty Wage	\$6.00	\$8.13	\$10.25	\$8.13	\$10.25	\$12.38	\$4.06	\$5.13	\$6.19
Minimum Wage	\$8.46	\$8.46	\$8.46	\$8.46	\$8.46	\$8.46	\$8.46	\$8.46	\$8.46

Source: MIT Living Wage Calculator

Figure 9 shows labor market engagement for Collier County. The labor market index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in the neighborhood. (HUD, HUD USER, 2021)

Figure 9: Labor Market Engagement

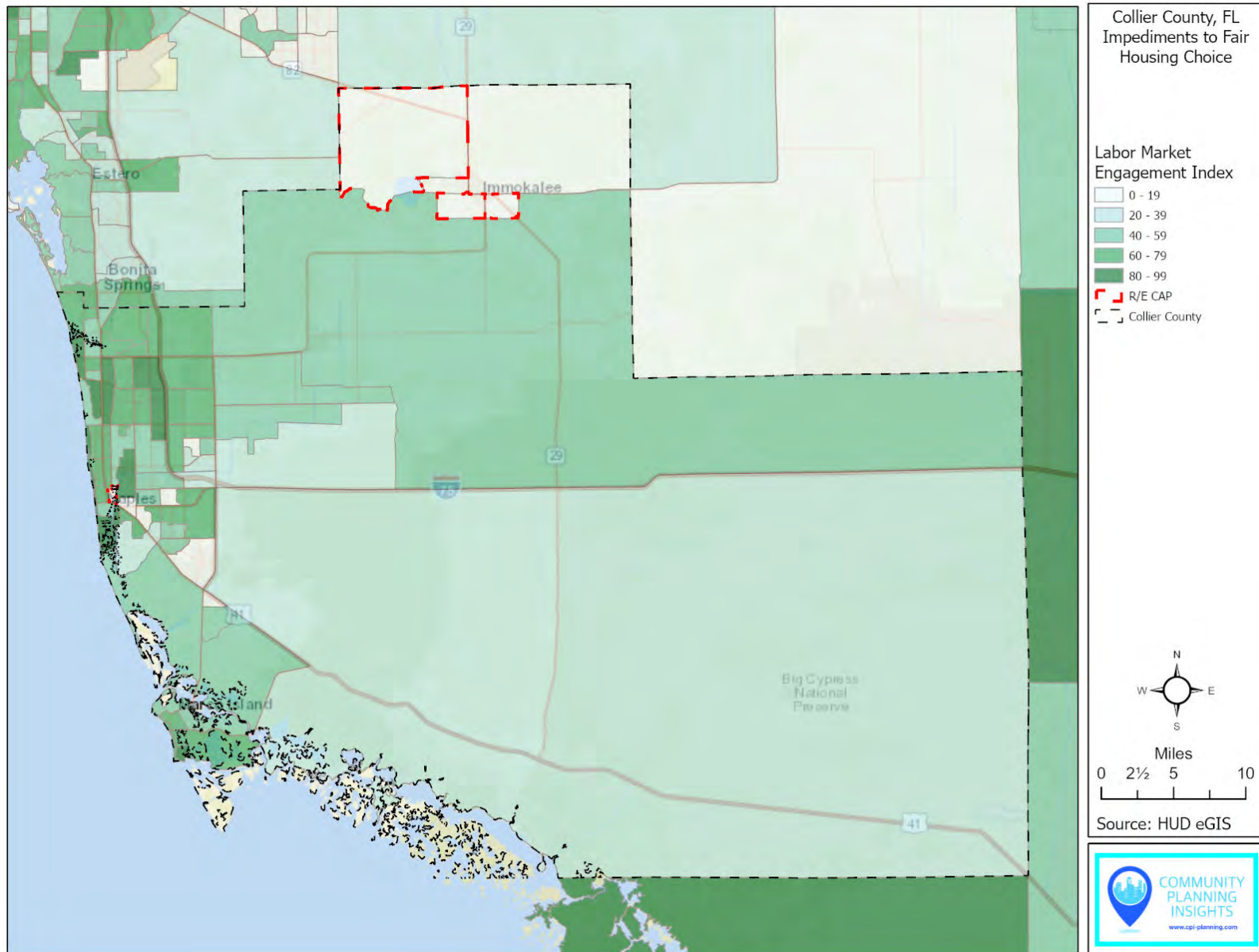
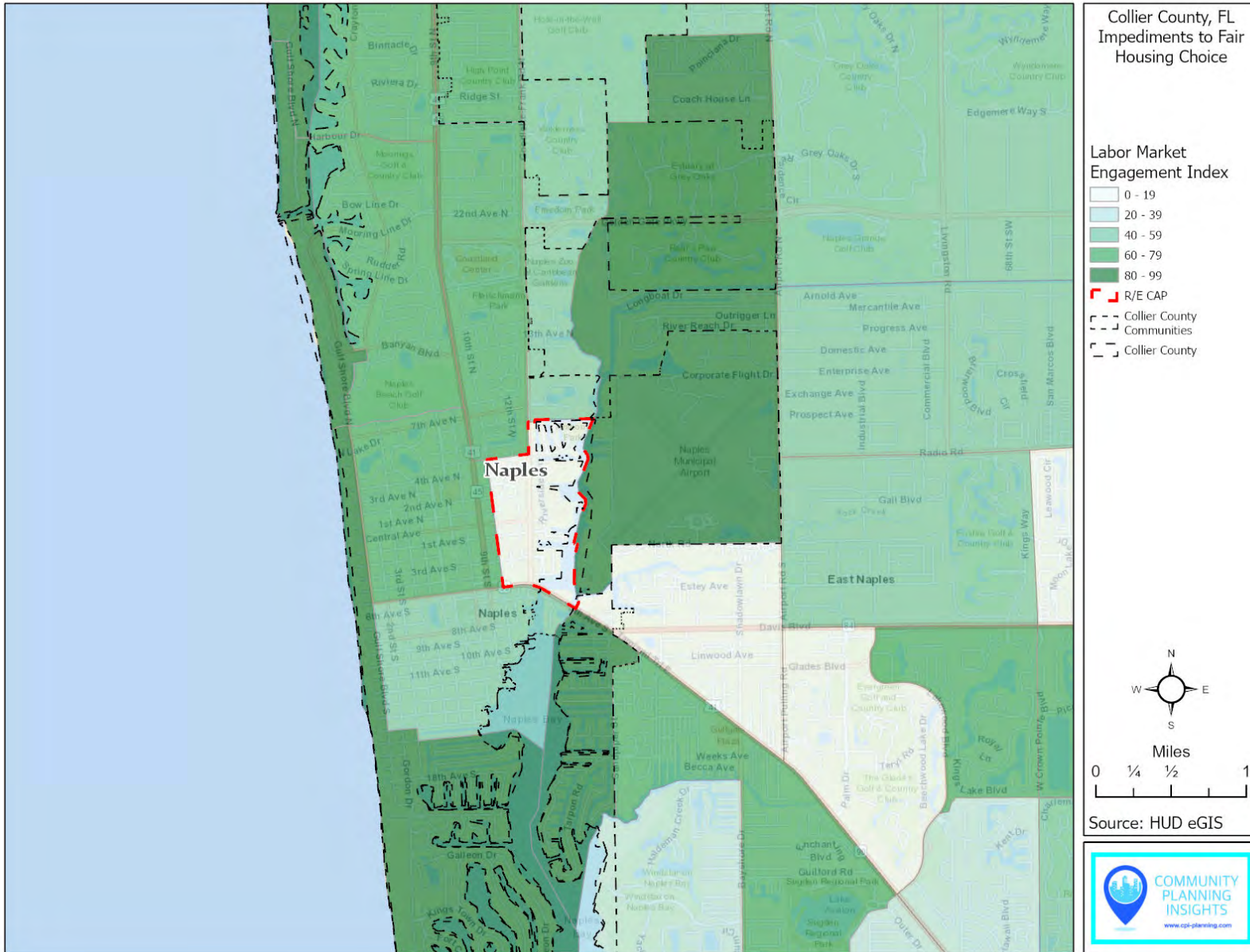


Figure 10: Naples Area Labor Market Engagement



Unemployment

Unemployment is higher in Immokalee than other parts of the County with Blacks and Whites experiencing the highest rates. The unemployment rate for Blacks in Collier County is more than double the overall rate for the county.

Table 29: Unemployment Rate by Race/Ethnicity

Race/Ethnicity	Collier County	Immokalee	Naples
Total	3.90%	10.60%	3.20%
White	3.10%	15.80%	3.70%
Black	7.10%	15.60%	0.00%
American Indian and Alaska Native	2.00%	8.30%	0.00%
Asian	1.20%	0.00%	0.00%
Native Hawaiian/Pacific Islander	0.00%	0.00%	0.00%
Some other race alone	3.90%	2.90%	0.00%
Two or more races	5.10%	0.00%	0.00%
Hispanic	4.60%	8.80%	0.50%

Source: 2019 ACS 5-Year Estimates

Table 30: Unemployment Rate by Gender

Gender	Collier County	Immokalee	Naples
Male (20-64)	3.00%	8.20%	4.60%
Female (20-64)	4.50%	11.30%	0.80%
Female w/ Children	3.30%	8.60%	0.00%
Female w/ Children Under 6	5.60%	8.40%	0.00%

Source: 2019 ACS 5-Year Estimates

Occupation and Industry

The majority of county residents are employed in management, business, science, and the arts occupations followed by service, and sales and office occupations. Women have a significantly higher representation in each of these occupations. The highest occupation for men is management, business science, and arts occupations compared to sales and office occupations for women.

Table 31: Collier County Occupation Population Age 16 and Over by Gender

Collier County				
Population Age 16 and Over	158,452		54.80%	45.20%
Occupation	Total	% of Total	Male	Female
Management, business science, and arts occupations	49,079	30.97%	49.30%	50.70%
Service occupations	38,559	24.33%	46.10%	53.90%
Sales and office occupations	34,885	22.02%	38.10%	61.90%
Natural resources, construction, and maintenance occupations	22,568	14.24%	94.30%	5.70%
Production, transportation, and material moving occupations	13,361	8.43%	77.30%	22.70%

Source: 2019 ACS 5-Year Estimates

In Immokalee, males are over-represented in the workforce compared to their representation in the population (52.72%). The leading occupation for males is natural resources, construction, and maintenance occupations with 84.9% representation followed by 67.8% representation in production, transportation, and material moving occupations compared to women who represent 72.2% of sales and office occupations followed by management, business science, and arts occupations.

Table 32: Immokalee Occupation Population Age 16 and Over by Gender

Immokalee				
Population Age 16 and Over	11,541		61.10%	38.90%
Occupation	Total	% of Total	Male	Female
Management, business science, and arts occupations	1,239	10.74%	33.90%	66.10%
Service occupations	2,437	21.12%	45.10%	54.90%
Sales and office occupations	1,607	13.92%	27.30%	72.70%
Natural resources, construction, and maintenance occupations	5,019	43.49%	84.90%	15.10%
Production, transportation, and material moving occupations	1,239	10.74%	67.80%	32.20%

Source: 2019 ACS 5-Year Estimates

Table 33: Naples Occupation Population Age 16 and Over by Gender

Naples				
Population Age 16 and Over	7,076		52.90%	47.10%
Occupation	Total	% of Total	Male	Female
Management, business science, and arts occupations	3,475	49.11%	26.10%	43.90%
Service occupations	977	13.81%	40.10%	59.90%
Sales and office occupations	1,987	28.08%	42.50%	57.50%
Natural resources, construction, and maintenance occupations	372	5.26%	89.80%	10.20%
Production, transportation, and material moving occupations	265	3.75%	83.80%	16.20%

Source: 2019 ACS 5-Year Estimates

From 2000 to 2010, Collier County experienced an upward trend in employment in arts, entertainment, and recreation. Since that time, the trend moved downward although staying near the same levels at the state. The trend is anticipated to stay level through 2025 (University, 2021). However, this may be impacted by the COVID-19 pandemic. Except for Immokalee where women will be disproportionately impacted, a decline in this industry will have a proportionate impact on men and women (University, 2021).

The leading industries in Collier County are:

- Education services, healthcare, and social assistance
- Arts, entertainment, recreation, accommodations, and food services, and
- Professional, scientific, management, administrative, and waste management services.

The leading industry for males is construction with a representation of 93.3% industry compared to education services, health care, and social assistance for women with a representation of 74.7%.

The leading industries in Immokalee are:

- Agriculture, forestry, fishing hunting, and mining
- Arts, entertainment, recreation, accommodations, and food services, and Education services, healthcare, and social assistance, and
- Education services, healthcare, and social assistance

The leading industry for males is construction with a representation of 99% compared to education services, healthcare, and social assistance for women with a representation of 81.3%.

The leading industries for Naples are:

- Education services, healthcare, and social assistance
- Retail trade, and
- Arts, entertainment, recreation, accommodations, and food services

The leading industry for males is agriculture, forestry, fishing hunting, and mining with a representation of 96.8% compared to education services, healthcare, and social assistance for women with a representation of 68.8%.

Table 34: Industry Population Age 16 and Over by Gender

	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Industry	158,452	54.80%	45.20%	11,541	61.10%	38.90%	7,076	52.90%	47.10%
Agriculture, forestry, fishing and hunting, and mining	4,737	77.90%	22.10%	3,527	76.20%	23.80%	31	96.80%	3.20%
Construction	18,311	92.30%	7.70%	1,628	99.00%	1.00%	397	84.10%	15.90%
Manufacturing	6,346	66.90%	33.10%	234	30.80%	69.20%	397	78.30%	21.70%
Wholesale trade	3,117	60.40%	39.60%	496	45.40%	54.60%	257	49.40%	50.60%
Retail trade	19,552	47.60%	52.40%	755	54.80%	45.20%	951	39.50%	60.50%
Transportation and warehousing and utilities	6,452	80.90%	19.10%	208	60.60%	39.40%	226	46.50%	23.50%
Information	1,973	68.60%	31.40%	32	28.10%	71.90%	65	46.20%	53.80%
Finance and insurance, and real estate and rental and leasing	12,093	51.50%	48.50%	218	29.80%	70.20%	1,195	60.50%	39.50%
Professional, scientific, and management, and administrative and waste management services	23,301	58.70%	41.30%	1,121	66.20%	33.80%	1,241	56.90%	43.10%
Education services, and health care and social assistance	25,119	25.30%	74.70%	1,285	18.70%	81.30%	1,197	31.20%	68.80%
Arts, entertainment, and recreation, and accommodations and food services	24,138	49.20%	50.80%	1,490	39.70%	60.30%	738	48.80%	51.20%
Other services (except public administration)	9,296	42.80%	57.20%	399	54.40%	45.60%	304	51.60%	48.40%
Public administration	4,017	53.60%	46.40%	148	35.10%	64.90%	77	54.50%	45.50%

Source: 2019 ACS 5-Year Estimates

Transportation

According to the needs and assets assessment, residents were concerned with the lack of public transportation options. Residents feel the existing system caters to the hotel and tourism population rather than the locals due to the routes and infrequency of operation. It was also noted that many seasonal workers do not have driver's licenses making them more dependent on adequate public transportation (Research, 2021).

Journey-to-work characteristics and commuter flow patterns were compiled for the 10-year Transportation Development Plan (TDP). According to the TDP, a low proportion of commuters using alternative modes of transportation like walking and transit may indicate a less transit supportive environment including limited access to transit. It also reflects the share of the population that uses transit because they have no other mobility options. Between 2000 and 2018, the use of public transit increased from 1.9% to 2.2%. During that time period, the share of residents working outside the County slightly increased. The TDP further states that the highest proportion of residents that commute to jobs in other counties are in the northwest area and the Immokalee area (County, 2021-2030 Transportation Development Plan, 2021).

Transit and other forms of alternative transportation are critical for many renters. Renters are more likely than other households to depend on transportation modes other than their own cars to reach work, shopping, and other activities. This is particularly true for seniors, the disabled and those with low incomes. As Collier County's population continues to age there will be an increased need for affordable rental housing with access to transit, paratransit, and other forms of alternative transportation.

Transportation to and from employment centers in Collier, or outlying communities, puts a strain on the existing infrastructure based on the jobs housing imbalance that exists in Southwest Florida. Currently, the average headway (the average interval of time between buses pausing at a given stop on a route) in Collier County is 1.5 hours, with the shortest headway at 45 minutes. For transit riders dependent on a bus service to get to work or to other services, the infrequency of the service can make transportation and access an increased difficulty. For riders who might have multiple stops or transfers, those headways can change what would be a short car ride into an all-morning or all evening commute (County, 2017 Community Housing Plan, 2021). The TDP asked survey respondents to rank system improvement and amenities based on their perceived importance. A desire for more frequent service had the highest weighted score followed by on time performance and earlier/later service.

Table 35: Place of Work

	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
In County	89.90%	97.30%	98.50%	87.10%	84.00%	92.30%	88.60%	86.20%	91.20%
Outside County	8.00%	87.90%	92.30%	12.60%	16.00%	6.80%	4.60%	4.90%	4.10%
Outside State	2.20%	2.70%	1.50%	0.30%	0.00%	0.80%	6.80%	8.80%	4.60%

Source: 2019 ACS 5-Year Estimates

Table 36: Means of Transportation (Workers 16 and Over)

Means of Transportation	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Car, truck, or van	87.50%	86.10%	89.20%	74.40%	73.80%	75.50%	75.40%	72.90%	78.10%
Drove alone	75.10%	72.60%	78.30%	45.30%	40.30%	53.50%	72.00%	68.90%	75.40%
Carpooled	12.40%	13.50%	10.90%	29.20%	33.50%	22.10%	3.40%	4.00%	2.60%
Public	1.60%	2%	1.10%	16.30%	20.50%	9.30%	0.70%	0.80%	50.00%
Walked	1.30%	1.50%	1.20%	5.70%	4.00%	8.60%	2.00%	1.10%	2.90%
Biked	0.90%	1.40%	0.30%	1.00%	0.90%	1.20%	1.20%	1.90%	50.00%
Taxi	1.40%	1.60%	1.20%	0.80%	0.40%	1.36%	1.60%	2.20%	90.00%
Worked from Home	7.30%	7.50%	7.10%	1.70%	0.50%	3.70%	19.20%	21.00%	17.20%

Source: 2019 ACS 5-Year Estimates

Commute

According to the 2017 Collier County Community Housing Plan (CHP), there is a Jobs-Housing imbalance in Collier County resulting in at least 17.4% of the workforce (approximately 40,000 people) commuting daily from outside of Collier County. These employees work in Collier County but live in Lee, Charlotte, or other counties. Many public sector employees (Sheriff's Office, County & City government, School personnel) and large segments of the private sector cannot afford to live in Collier County (County, 2017 Community Housing Plan, 2021).

Table 37: Commute Times (Workers 16 and Over)

Commute Times (minutes)	Collier County			Immokalee			Naples		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Less than 10	10.60%	9.60%	11.90%	15.40%	8.90%	26.70%	26.10%	20.10%	32.30%
10-14	13.50%	13.00%	14.30%	13.30%	10.30%	18.40%	23.20%	29.00%	17.10%
15-19	17.00%	15.40%	19.00%	9.00%	6.50%	13.30%	21.30%	18.10%	24.60%
20-24	16.10%	15.80%	16.40%	8.20%	9.10%	6.60%	7.30%	6.50%	8.00%
25-29	8.10%	7.50%	8.80%	5.70%	7.10%	3.30%	3.40%	2.70%	4.20%
30-34	15.50%	16.10%	14.80%	10.40%	11.90%	7.80%	7.90%	10.30%	5.40%
35-44	7.20%	8.30%	5.80%	6.70%	9.50%	2.10%	2.30%	3.00%	1.50%
45-59	6.90%	8.30%	5.20%	10.10%	12.80%	5.40%	3.50%	5.40%	1.50%
60 or more	5.10%	6.10%	3.90%	21.10%	23.90%	16.30%	5.10%	4.90%	5.40%
Mean travel time to work	24.7	26.3	22.8	33.9	38.8	25.4	19.6	22.3	16.7

Source: 2019 ACS 5-Year Estimates

The 2017 CHS provided the following recommendations to make transportation more accessible throughout the County:

- Integrate Bus Routes with Affordable Housing Locations
- Enhance Bike Lane and Pedestrian Systems
- Ride Sharing Options for Enhanced Mobility
- Ride Sharing Options for Enhanced Mobility

Public Transit

The Collier Area Transit (CAT) system began in 2001 with servicing only five routes and 324,000 passengers in its first year. CAT is managed by a small team of County staff and the County hires an operating vendor to conduct the day-to-day operations. CAT is the designated Community Transportation Coordinator (CTC) for the County. As the CTC, CAT administers the coordination of transportation service for the disabled and economically disadvantaged through the Florida Commission for the Transportation Disadvantaged (TD). To ensure the provision of services is safe, efficient, and cost effective, the Board of County Commissioners has appointed a Local Coordinating Board (LCB) to monitor service levels. The LCB reviews the amount and quality of service being provided (Transit, 2021).

According to the 2021-2030 Collier County Transportation Development Plan (TDP) respondents, 25.39% of passengers were between the ages of 35-44, 21.89% were ages 25-34, and ages 45-54 represented 15.83% of passengers. Nearly 53% of respondents were male. Blacks (24.75%) and Hispanics (27.73%) made up approximately 53% of ridership (County, 2021-2030 Transportation Development Plan, 2021).

Transportation Disadvantage

Collier County Public Transit & Neighborhood Enhancement (PTNE) Division administers the Paratransit system. To be eligible for ADA service, a disability must prevent the use of CAT's fixed route bus service and the origin and destination of your trip must be within 3/4 (three-quarters) of a mile of a fixed route. ADA Service is provided within the same daily and hourly scheduled of the fixed route service.

According to the TDP, between 2014 and 2018, the TD population increased nearly 18.9% and the number of trips increased 29.8%. The cost to provide paratransit is more expensive than the fixed route service. If the growth trend continues, there will be a need to provide more cost-efficient fixed-route service. (County, 2021-2030 Transportation Development Plan, 2021)

CATConnect is a shared ride door-to-door transportation service provided for individuals who do not have access to any other means of transportation, including CAT fixed route bus service. Medicated clients must receive their Medicaid transportation through MTM, Inc., who is contracted with the Agency for Health Care Administration (AHCA). (Transit, 2021)

Figure 11 illustrates the Low Transportation Cost Index for Collier County and Figure 12 for Naples. As the map illustrates, the index is higher (meaning transportation costs are lower) in the dense urban areas versus the rural parts of Collier County. This is largely the result of higher retail and job clusters in the urban areas, along with a more robust and dense transportation system.

Figure 11: Collier County Low Transportation Cost Index

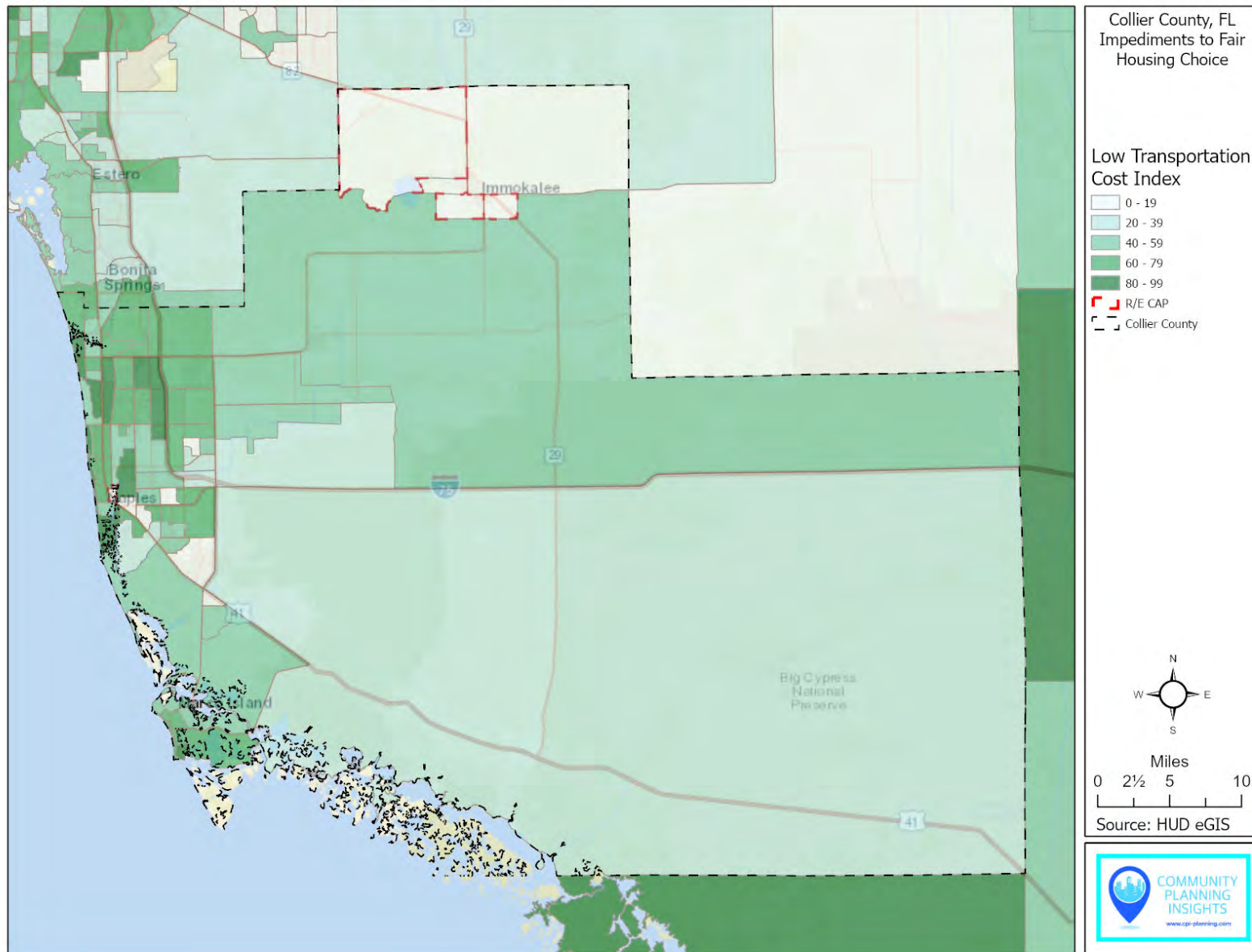
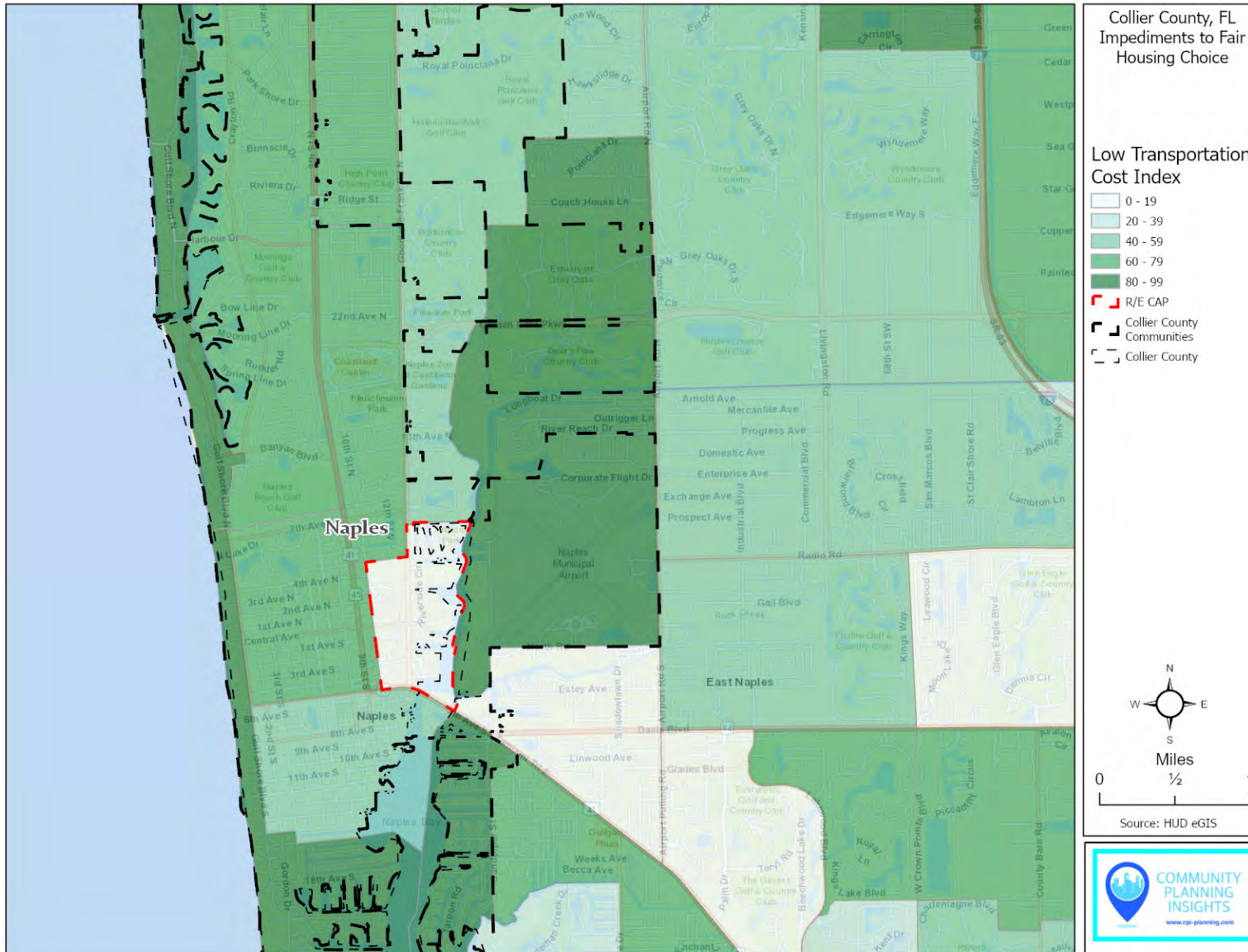


Figure 12: Naples Area Low Transportation Cost Index



Housing Profile

Table 38 provides an overview of housing units in Collier County, Immokalee, and Naples.

Table 38: Housing Profile

	Collier County		Immokalee		Naples	
Total Units	214,473		6,762		19,966	
Occupied Housing Units	142,979	66.70%	5,985	88.50%	10,797	54.10%
Vacant Housing Units	71,494	33.30%	777	11.50%	9,169	45.90%

Source: 2019 ACS 5-Year Estimates

The median sales price for a single-family home in Collier County is \$385,000 compared to \$250,000 in neighboring Lee County (University, 2021). The majority of households are owner occupied in Collier County and Naples, compared to primarily renters in Immokalee. The majority of homeowners Collier County do not have a mortgage, and that number is significantly higher in the city of Naples.

Table 39: Owner Occupied Housing

	Collier County		Immokalee		Naples	
Avg Household Size - Owner	2.45		4.4		2.00	
Owner Occupied	104,852	73.30%	2,261	37.80%	8453	78.30%
Homeowner Vacancy Rate	3.30		2.00		5.00	
Owner Occupied w/ Mortgage	50,183	47.90%	1110	49.10%	2810	33.20%
Owner Occupied w/o Mortgage	54,669	52.10%	1151	50.90%	5643	66.80%

Source: 2019 ACS 5-Year Estimates

Table 40: Renter Occupied Housing

	Collier County		Immokalee		Naples	
Avg Household Size - Renter	2.91		4.27		1.97	
Renter Occupied	38,127	26.70%	3,724	62.20%	2344	21.70%
Renter Vacancy Rate	8.80		7.90		15.30	

Source: 2019 ACS 5-Year Estimates

Homeownership vs. Renter

Table 41 through

Table 43 show owner vs renter occupied housing units by race and ethnicity. There is a 73.33% homeownership rate in Collier County of which 83.2% are White, 11.9% Hispanic, and 2.9% Black. There is a 37.78% homeownership rate in Immokalee of which 66.8% are Hispanic, 27.3% Black, and 7.7% White.

Table 41: Collier County Owner vs. Renter Occupied Housing Units by Race/Ethnicity

Race/Ethnicity	Occupied Units	Owner	Renter
Total	142,979	73.33%	26.67%
White	108,335	83.20%	55.40%
Black	6,363	2.90%	8.60%
American Indian/Alaska Native	204	0.20%	0.10%
Asian	1,413	1.00%	0.90%
Native Hawaiian/Pacific Islander	-	0.00%	0.00%
Some other race	1,351	0.60%	1.80%
Two or more races	1,444	1.10%	0.80%
Hispanic	25,668	11.90%	34.60%

Source: 2019 ACS 5-Year Estimates

Table 42: Immokalee Owner vs. Renter Occupied Housing Units by Race/Ethnicity

Race/Ethnicity	Units	Owner	Renter
Total	5,985	37.78%	62.22%
White	399	7.70%	6.00%
Black	1,445	19.00%	27.30%
American Indian/Alaska Native	70	1.90%	0.80%
Asian	6	0.30%	0.00%
Native Hawaiian/Pacific Islander	-	0.00%	0.00%
Some other race	244	4.90%	3.60%
Two or more races	91	1.40%	1.60%
Hispanic	4,096	71.20%	66.80%

Source: 2019 ACS 5-Year Estimates

There is a 78.29% homeownership rate in Naples of which 75.2% are White, 13.10% Hispanic, and 11% Black.

Table 43: Naples Owner vs. Renter Occupied Housing Units by Race/Ethnicity

Race/Ethnicity	Units	Owner	Renter
Total	10,797	78.29%	21.71%
White	9,983	97.30%	75.20%
Black	291	0.40%	11.00%
American Indian/Alaska Native	5	0.10%	0.00%
Asian	43	0.40%	0.30%
Native Hawaiian/Pacific Islander	-	0.00%	0.00%
Some other race	33	0.30%	0.20%
Two or more races	70	0.80%	0.30%
Hispanic	392	1.00%	13.10%

Source: 2019 ACS 5-Year Estimates

Figure 13: Collier County Homeownership Rates

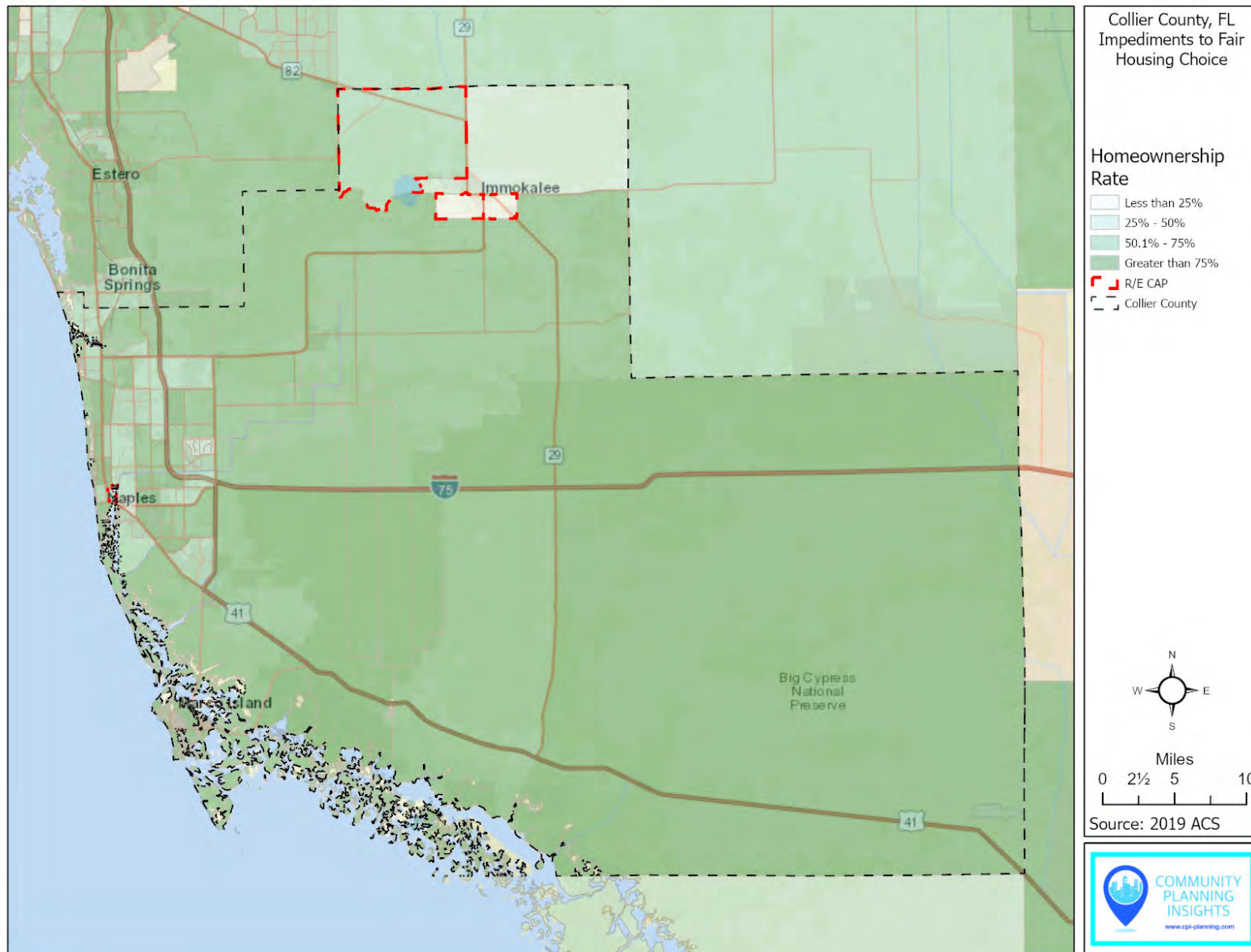


Figure 14: Naples Area Homeownership Rate

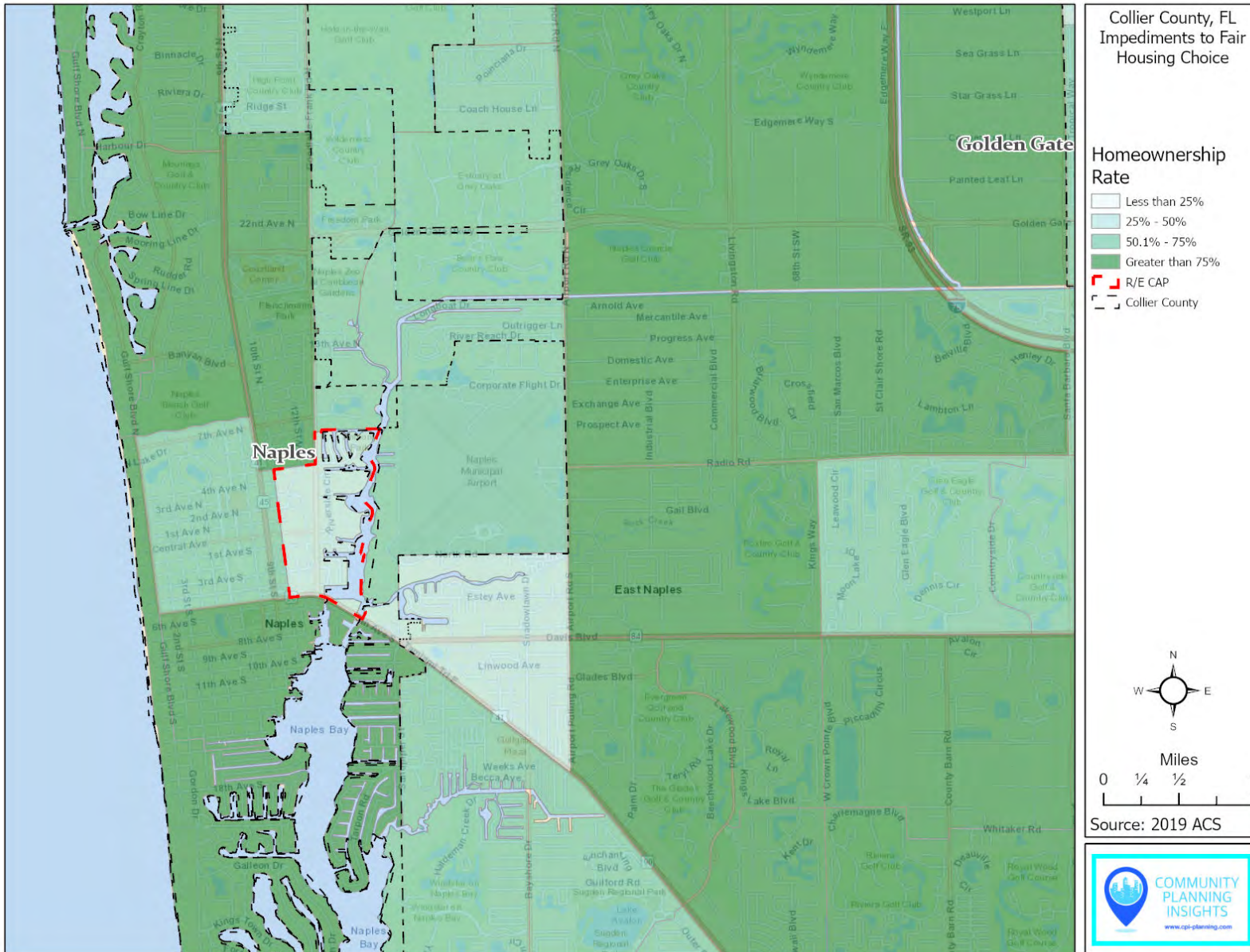


Figure 15: Collier County Rental Occupancy Rate

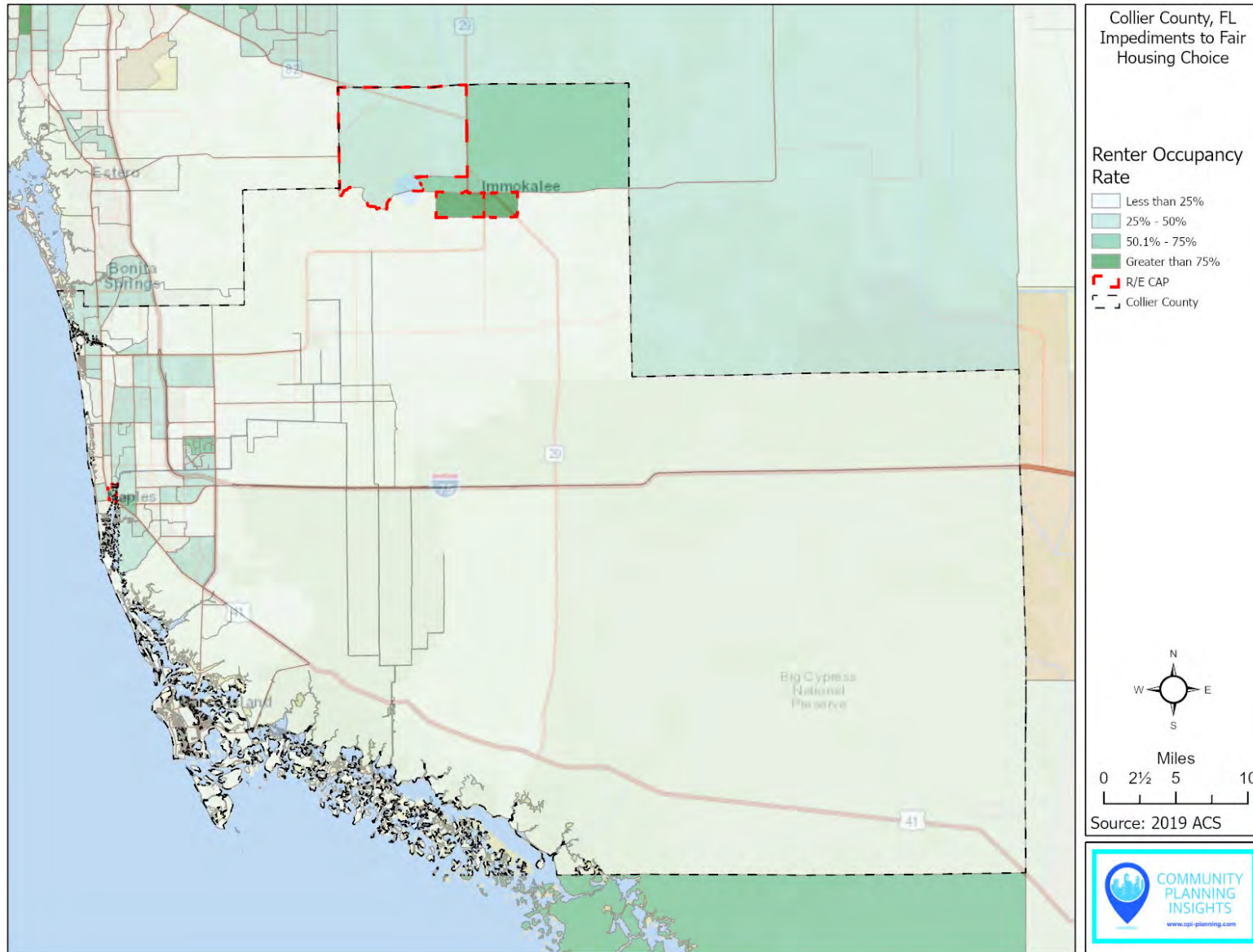
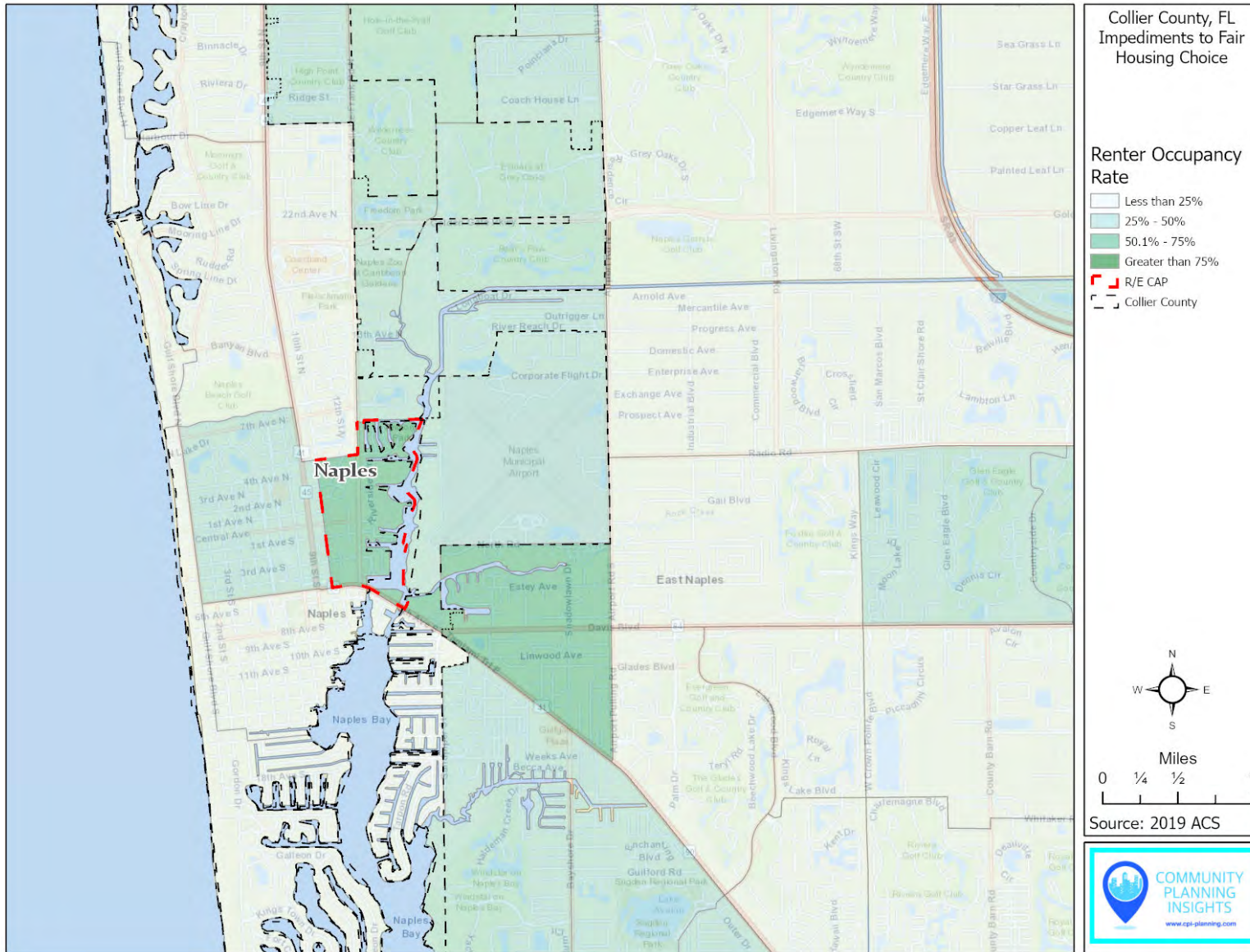


Figure 16: Naples Area Rental Occupancy Rate



Affordable Housing

Collier County’s historical development pattern is low density, single family homes. Since its initial establishment, Naples and Collier County have focused on high-end second home communities, seasonal resort tourism, and the businesses that support this economic engine. As a result of this market driven pattern, large segments of the population have been underserved and priced out of the market.

The County’s housing production is not sufficiently diverse with regard to size, tenure, location, and price points, to adequately reflect the social, economic, and age-related diversity of our population. The result of these trends and policies is a significant disparity between the cost of housing and the incomes of the average person and the working poor (County, 2017 Community Housing Plan, 2021).

HUD sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. Table 44 the income limits for FY 2020 for the Naples-Immokalee-Marco Island, FL MSA HUD Metro FMR Area which includes Collier County. (HUD, Fair Market Rents, 2021)

Table 44: Collier County HUD FY 2020 Income Limits

FY 2021 Income Limits								
	Persons in Family							
Median Family Income (\$84,300)	1	2	3	4	5	6	7	8
Extremely Low-Income Limits (30%)	\$17,750	\$20,250	\$22,800	\$26,500	\$31,040	\$35,580	\$40,120	\$44,660
Very Low-Income Limits (50%)	\$29,550	\$33,750	\$37,950	\$42,150	\$45,550	\$48,900	\$52,300	\$55,650
Low Income Limits (80%)	\$47,250	\$54,000	\$60,750	\$67,450	\$72,850	\$78,250	\$83,650	\$89,050
NOTE: Collier County is part of the Naples-Immokalee-Marco Island, FL MSA, so all information presented here applies to all of the Naples-Immokalee-Marco Island, FL MSA.								

Source: HUD User

Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solutions Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units. (HUD, Fair Market Rents, 2021)

Table 45: Collier County 2020 Fair Market Rent

Final FY 2021 & 2020 FMRs by Unit Bedrooms					
Year	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
FY 2021 FMR	\$948	\$1,118	\$1,376	\$1,791	\$1,922
FY 2020 FMR	\$900	\$1,126	\$1,381	\$1,812	\$2,026

Source: HUD User

Cost Burden

HUD defines cost-burdened families as those “who pay more than 30% of their income for housing” and “may have difficulty affording necessities such as food, clothing, transportation, and medical care.” Severe rent burden is defined as paying more than 50% of one’s income on rent. (HUD, PD&R EDGE, 2021) The Census defines monthly owner costs as the sum of payments for mortgages, deeds of trust, contracts to purchase, or similar debts on the property. It also includes, where appropriate, the monthly condominium fee for condominiums and mobile home costs (Census, 2021).

The people who are cost burdened in Collier County are crucial to the local economy. They provide key public safety, education, and health care services to the community’s residents. In addition, they are responsible for the high-quality lifestyle that makes Collier County such a special place (Institute U. L., 2021).

The 2017 housing plan indicated transportation costs can directly add or subtract substantial funds from families’ household budgets, thereby increasing cost burdens or providing more flexibility in household budgets (County, 2017 Community Housing Plan, 2021). According to the 2017 Community Housing Plan, Collier County is ranked 12th highest in Florida for the number of households that are cost burdened.

Table 46 provides data on housing cost burden for occupied units in Collier County with and without a mortgage and renters. There are 29.1% of homeowners with a mortgage and 13.6% without paying more than 35% of their income toward housing compared to 45.7% of renters.

Table 46: Collier County Housing Cost Burden

Collier County			
Housing Cost Burden	w/ Mortgage	w/o Mortgage	Renter
Less than 20%	38.20%	71%	20.20%
20 - 24.9%	15.40%	7.10%	12.80%
25 - 29.9%	11.80%	5.00%	11.00%
30 - 34.9%	5.50%	3.40%	10.30%
35% or more	29.10%	13.60%	45.70%
Median	\$1,869.00	\$754.00	\$1,317.00

Source: 2019 ACS 5-Year Estimates

Table 47 provides data on housing cost burden for occupied units in Immokalee with and without a mortgage and renters. There are 40.3% of homeowners with a mortgage and 4.8% without paying more than 35% of their income toward housing compared to 48.8% of renters.

Table 47: Immokalee Housing Cost Burden

Immokalee			
Housing Cost Burden	w/ Mortgage	w/o Mortgage	Renter
Less than 20%	33.30%	81.40%	24.90%
20 - 24.9%	9.90%	3.70%	9.60%
25 - 29.9%	10.50%	9.10%	8.90%
30 - 34.9%	8.90%	1.10%	7.90%
35% or more	40.30%	4.80%	48.80%
Median	\$978.00	\$391.00	\$798.00

Source: 2019 ACS 5-Year Estimates

Table 48 provides data on housing cost burden for occupied units in Collier County with and without a mortgage and renters. There are 31.3% of homeowners with a mortgage and 19.4% without paying more than 35% of their income toward housing compared to 39.1% of renters.

Table 48: Naples Housing Cost Burden

Naples			
Housing Cost Burden	w/ Mortgage	w/o Mortgage	Renter
Less than 20%	41.90%	66.40%	29.30%
20 - 24.9%	12.70%	5.20%	9.50%
25 - 29.9%	9.90%	5.20%	13.10%
30 - 34.9%	4.20%	3.80%	8.90%
35% or more	31.30%	19.40%	39.10%
Median	\$3,448.00	\$1,466.00	\$1,357.00

Source: 2019 ACS 5-Year Estimates

Table 49 illustrates cost burden by household type. As the table illustrates, nearly 45,000 households are cost burdened. Small families make up the largest share cost burdened households, followed by elderly non-family households, elderly family households, and single individuals.

Table 49: Cost Burden by Household Type

	Housing Cost Burden is 30% - 50%	housing cost burden is greater than 50%	Total
Elderly family (2 persons, with either or both age 62 or over)	4,765	4,370	9,135
Elderly non-family	5,030	6,975	12,005
Large family (5 or more persons)	1,990	935	2,925
Small family (2 persons, neither person 62 years or over, or 3 or 4 persons)	7,985	5,880	13,865
Other (non-elderly non-family)	3,595	3,380	6,975
Total	23,365	21,540	44,905

Source: 2013-2017 CHAS

Figure 17: Owner Occupied Cost Burden - Collier County

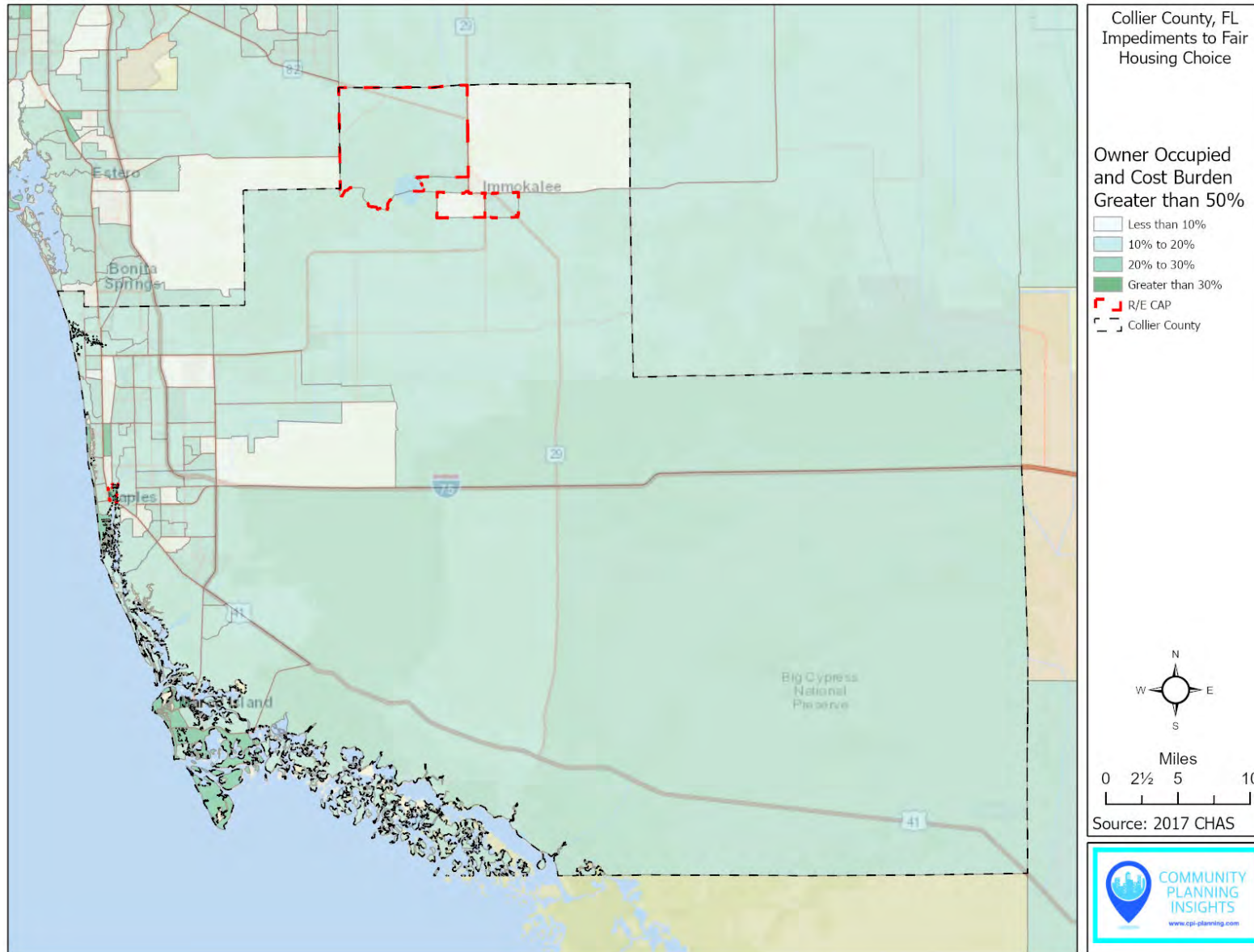


Figure 18: Owner Occupied Cost Burden - Naples Area

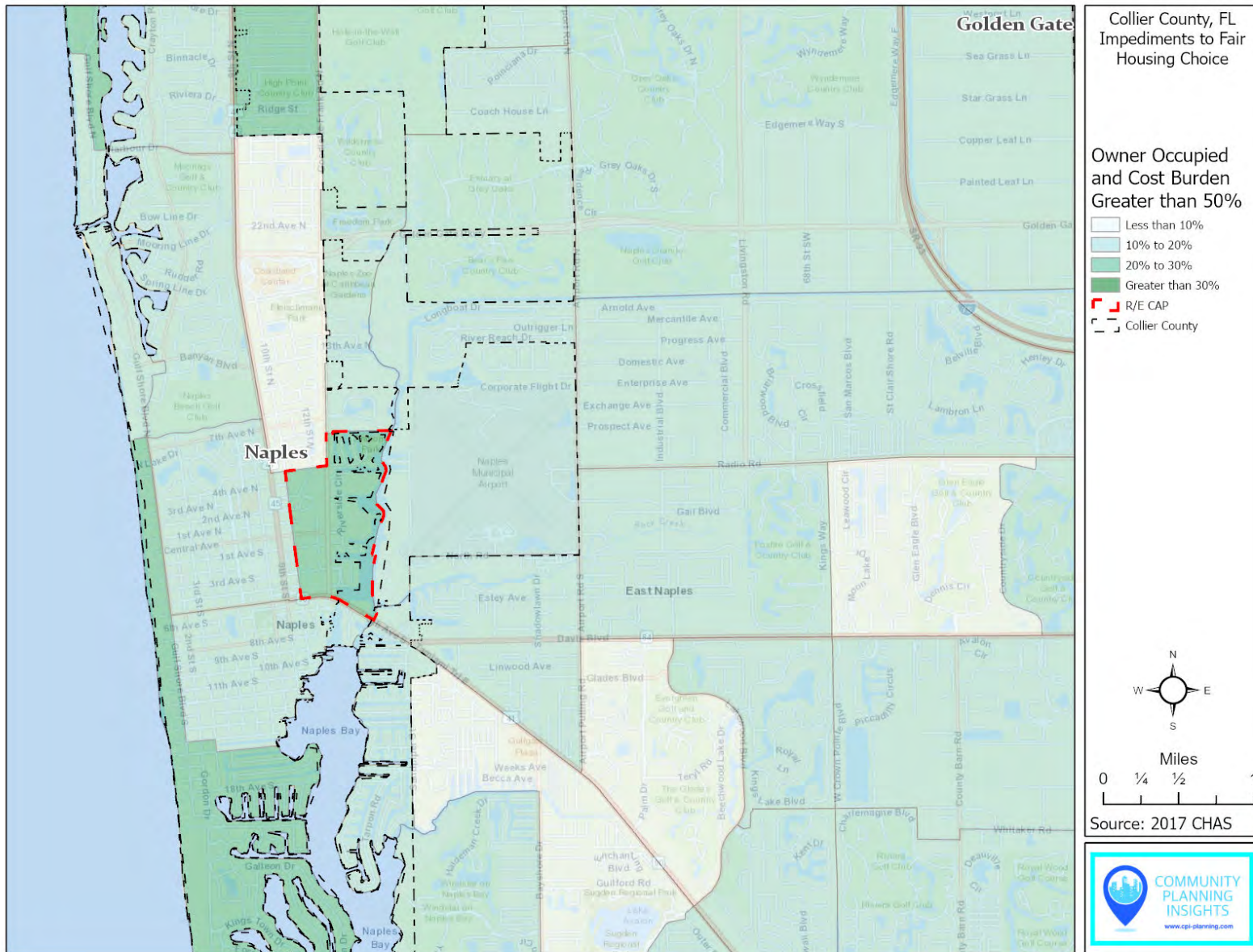


Figure 19: Renter Occupied Cost Burden - Collier County

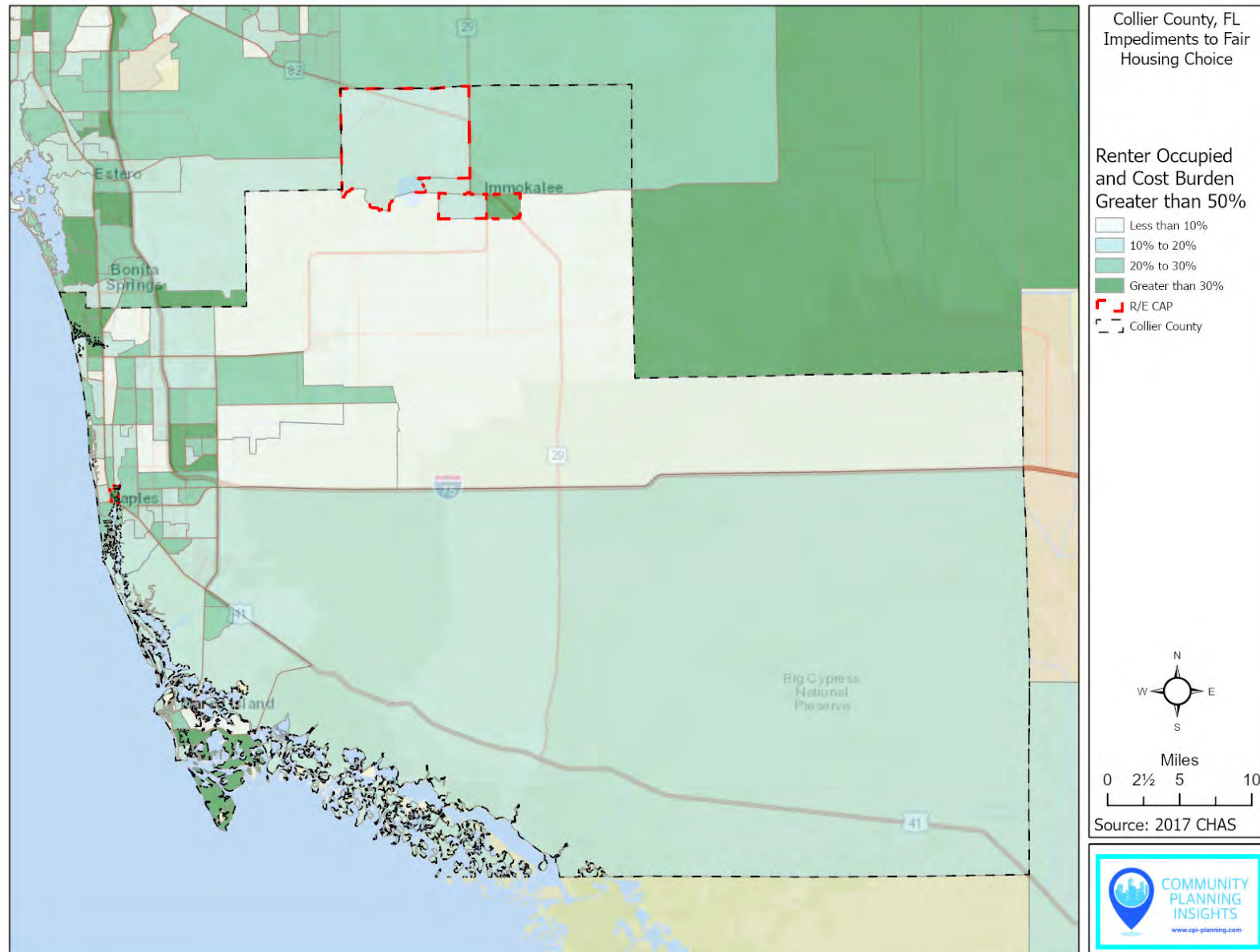
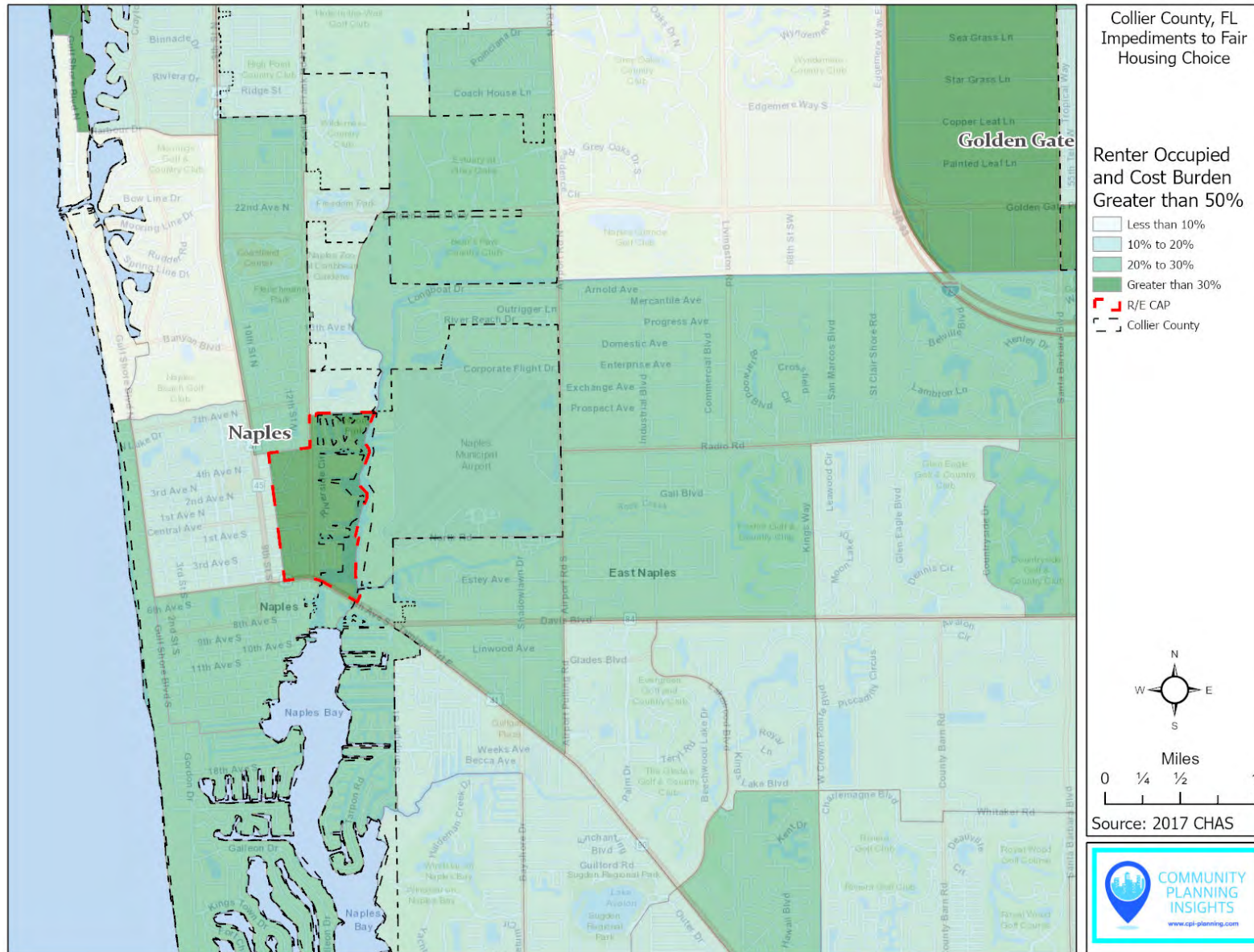


Figure 20: Renter Occupied Cost Burden - Naples Area



According to a housing study conducted by the Urban Land Institute (ULI), The people who are cost burdened in Collier County are crucial to the local economy. They provide key public safety, education, and health care services to the community's residents. In addition, they are responsible for the high-quality lifestyle that makes Collier County such a special place.

Examples include workers in the healthcare, education, public safety, and service industries. According to stories heard while preparing the study, it is difficult to recruit service industry workers, particularly those in the resorts and hotels, unless they share a living space or commute long distances. Employment sectors that are most at risk at incurring significant cost burden represent more than 50% of the local labor force (Institute U. L., 2021).

Table 50 and Table 51 illustrate wage and rent comparisons by industry and occupations within Collier County. The tables also show the percent of income the average worker must spend working a 40-hour work week to afford a two-bedroom apartment at fair market rent. A significant number of service and hospitality workers must spend more than 30% of their income simply to afford a two-bedroom apartment in Collier County.

Table 50: Wage and Rent Comparison by Industry- 2018 (FRM: \$1,200)

Industry	# of Workers in 2018	Share of Workers	Average Hourly Wage	Maximum Affordable Rent (30% of Income)	% Income Needed for 2 BR FMR
Accommodation and Food Services	21,692	5.3%	\$13.27	\$663	55%
Natural Resources and Mining	3,371	0.8%	\$15.41	\$770	48%
Agriculture, Forestry, Fishing and Hunting	3,325	0.8%	\$15.18	\$759	48%
Leisure and Hospitality	29,990	7.3%	\$15.92	\$796	46%
Retail Trade	21,753	5.3%	\$17.30	\$865	42%
Other Services	6,435	1.6%	\$17.75	\$887	41%
Administrative and Waste Services	9,683	2.3%	\$20.17	\$1,008	36%
Trade, Transportation, and Utilities	28,214	6.8%	\$21.68	\$1,084	34%
Arts, Entertainment, and Recreation	8,298	2.0%	\$22.86	\$1,143	32%
Service-Providing	123,191	29.9%	\$24.37	\$1,218	30%
Goods-Producing	24,328	5.9%	\$24.25	\$1,212	30%
Construction	16,828	4.1%	\$24.65	\$1,232	30%
Educational Services	7,757	1.9%	\$24.32	\$1,216	30%
Real Estate and Rental and Leasing	4,032	1.0%	\$24.94	\$1,247	29%
Transportation and Warehousing	2,446	0.6%	\$25.65	\$1,282	29%
Education and Health Services	27,731	6.7%	\$26.15	\$1,307	28%
Health Care and Social Assistance	19,973	4.8%	\$26.86	\$1,343	27%

Industry	# of Workers in 2018	Share of Workers	Average Hourly Wage	Maximum Affordable Rent (30% of Income)	% Income Needed for 2 BR FMR
Manufacturing	4,129	1.0%	\$29.82	\$1,491	25%
Durable Goods Manufacturing	3,533	0.9%	\$28.78	\$1,439	25%
Professional and Business Services	15,654	3.8%	\$30.60	\$1,530	24%
Public Administration	5,775	1.4%	\$30.19	\$1,510	24%
Mining, Quarrying, and Oil and Gas Extraction	45	0.0%	\$31.66	\$1,583	23%
Information	1,273	0.3%	\$35.27	\$1,763	21%
Nondurable Goods Manufacturing	596	0.1%	\$35.98	\$1,799	20%
Utilities	223	0.1%	\$41.66	\$2,083	18%
Professional and Technical Services	5,613	1.4%	\$43.59	\$2,180	17%
Wholesale Trade	3,793	0.9%	\$43.05	\$2,153	17%
Financial Activities	8,033	1.9%	\$46.23	\$2,311	16%
Finance and Insurance	4,001	1.0%	\$67.68	\$3,384	11%
Management of Companies and Enterprises	358	0.1%	\$109.23	\$5,461	7%
Total Workers	412,073				

Table 51: Wage and Rent Comparison by Occupation

Occupation	# of Workers in 2018	Hourly Wage, Entry-Level	Max. Affordable Rent, Entry-Level	% Income Needed for 2 BR, Entry-Level	Hourly Wage, Experienced	Max. Affordable Rent, Experienced	% Income Needed for 2 BR, Experienced
Automotive Service Technicians and Mechanics	860	\$13.18	\$659.00	56.0%	\$21.31	\$1,065.50	34%
Bartenders	1,070	\$9.05	\$452.50	81.0%	\$17.56	\$878.00	42%
Carpenters	1,630	\$16.15	\$807.50	45.0%	\$23.95	\$1,197.50	31%
Cashiers	4,770	\$9.28	\$464.00	79.0%	\$12.06	\$603.00	61%
Child, Family, and School Social Workers		\$16.11	\$805.50	45.0%	\$22.07	\$1,103.50	33%
Construction Laborers	1,830	\$12.70	\$635.00	58.0%	\$17.24	\$862.00	42%
Cooks, Restaurant	3,910	\$10.81	\$540.50	68.0%	\$17.09	\$854.50	43%
Dishwashers	1,070	\$10.32	\$516.00	71.0%	\$11.70	\$585.00	63%
Electricians	940	\$15.17	\$758.50	48.0%	\$23.67	\$1,183.50	31%
Firefighters	450	\$19.68	\$984.00	37.0%	\$36.14	\$1,807.00	20%
Hairdressers, Hairstylists, and Cosmetologists	920	\$9.86	\$493.00	74.0%	\$23.09	\$1,154.50	32%
Janitors and Cleaners, Except Maids and Housekeeping Cleaners	2,720	\$10.44	\$522.00	70.0%	\$13.70	\$685.00	53%
Landscaping and Groundskeeping Workers	3,980	\$10.90	\$545.00	67.0%	\$17.54	\$877.00	42%

Occupation	# of Workers in 2018	Hourly Wage, Entry-Level	Max. Affordable Rent, Entry-Level	% Income Needed for 2 BR, Entry-Level	Hourly Wage, Experienced	Max. Affordable Rent, Experienced	% Income Needed for 2 BR, Experienced
Laundry and Dry-Cleaning Workers	310	\$10.16	\$508.00	72.0%	\$13.89	\$694.50	53%
Licensed Practical and Licensed Vocational Nurses	1,150	\$13.28	\$664.00	55.0%	\$23.28	\$1,164.00	31%
Maids and Housekeeping Cleaners	1,870	\$10.23	\$511.50	72.0%	\$14.10	\$705.00	52%
Painters, Construction and Maintenance	1,200	\$12.60	\$630.00	58.0%	\$17.63	\$881.50	42%
Pharmacy Technicians	680	\$12.24	\$612.00	60.0%	\$16.97	\$848.50	43%
Plumbers, Pipefitters, and Steamfitters	550	\$13.50	\$675.00	54.0%	\$22.26	\$1,113.00	33%
Police and Sheriff's Patrol Officers	630	\$21.53	\$1,076.50	34.0%	\$31.74	\$1,587.00	23%
Preschool Teachers, Except Special Education	370	\$9.13	\$456.50	80.0%	\$15.84	\$792.00	46%
Receptionists and Information Clerks	1,360	\$11.93	\$596.50	61.0%	\$16.90	\$845.00	43%
Retail Salespersons	6,380	\$9.85	\$492.50	74.0%	\$17.28	\$864.00	42%
Secretaries and Administrative Assistants, Except Legal, Medical,	2,580	\$11.62	\$581.00	63.0%	\$20.32	\$1,016.00	36%

Occupation	# of Workers in 2018	Hourly Wage, Entry-Level	Max. Affordable Rent, Entry-Level	% Income Needed for 2 BR, Entry-Level	Hourly Wage, Experienced	Max. Affordable Rent, Experienced	% Income Needed for 2 BR, Experienced
Security Guards	1,100	\$10.56	\$528.00	69.0%	\$16.17	\$808.50	45%
Taxi Drivers and Chauffeurs	160	\$10.61	\$530.50	69.0%	\$18.48	\$924.00	40%
Tellers	640	\$13.87	\$693.50	53.0%	\$18.20	\$910.00	40%
Waiters and Waitresses	5,640	\$8.92	\$446.00	82.0%	\$19.81	\$990.50	37%

Public and Publicly Supported Housing

The analysis of publicly supported housing considers HUD and local public housing authority data to provide a comprehensive fair housing examination of publicly supported housing in the County. The Collier County Housing Authority owns and manages four public housing developments: 276 units of low-income housing in Farm Worker Village, 315 units of farm labor housing also in Farm Worker Village, 30 units of farm labor housing known as Collier Village and a 192 bed dormitory known as Horizon Village. In addition, the Authority serves an estimated 3100 plus people through the administration of the Section 8 rental assistance program and Family Self Sufficiency Program to provide support services targeted to low, elderly, disabled and homeless that live in Collier County.

Table 52 illustrates the tenant characteristics of residents living in publicly subsidized housing. This data only includes Collier County residents receiving a Housing Choice Voucher and project-based Section 8 units. Data for residents living in non-HUD subsidized housing is not available.

Table 52: Subsidized Housing Tenant Characteristics

Summary of All HUD Programs	
Subsidized units available	935
% Occupied	96
Household income per year	\$12,475.00
% of local median (Household income)	20
% very low income	97
% extremely low income	85
% female head of household	75
% female head with children	18
% with disability, among all persons in households	15
% 62 or more (Head or spouse)	67
% 85 or more (Head or spouse)	7
Average months on waiting list	52
Average months since moved in	108
% Minority	80
% Black	29
% White	18
% Hispanic	51

Source: HUD User, April 2021

Of the directly HUD supported programs (Housing Choice Vouchers and Project-Based Section 8), 97% of residents are considered very low income, with the average household income only \$12,475.00. The vast majority of residents are female-headed households (75%), and 18% are single women with children. Seniors comprise 67% of the residents and 80% are minorities. Of the minority residents, 29% are Black and 51% are Hispanic. Black and Hispanic residents are overrepresented in publicly subsidized housing, compared to the percentage of Black and Hispanic residents overall in the community.

There is a high need for additional housing choice vouchers and/or publicly subsidized housing. Residents spent on average 4.3 years waiting for available housing unit. Additionally, residents spent on average 9 years in their apartment after they moved in. This length of tenure is significantly longer than most rental units, and speaks to the lack of available affordable units. Once a resident is finally able to move into a unit, they remain stable tenants, likely in part due to so few affordable housing options. Table 53 illustrates the deficit of affordable and available units by income cohort.

Table 53: Deficit of Affordable and Available Units by Income

	0-30% AMI	0-40% AMI	0-50% AMI	0-60% AMI	0-80% AMI	0-120% AMI
Units	-6,205	-8,261	-7,916	-6,209	-5,084	-1,030

Source: University of Florida

Analysis of CHAS and affordable housing data also concludes there is a need for additional units with 3 or more bedrooms. Within Collier County, there are 2,925 cost burdened large families (five or more persons), and 935 families are severely cost burdened. However, as Table 54 illustrates, there are only 48 subsidized units with more than 3 bedrooms. This is a critical need to support Collier Counties low-income, large families.

Additional sources of data and information document the severity of rising cost pressures and the extent of residential displacement and relocation throughout the County. This has also contributed to homelessness in the County, and to a lack of sufficient services to support residents in parts of the county. Senior women are emerging as a small but critical subset of homelessness. The waiting list for affordable senior housing is often three to five years (University, 2021)

Table 54: Subsidized Units by Number of Bedrooms

Total Number of Units:	Total Low- Income Units:	Number of Efficiency Units:	1 Bedroom Units:	2 Bedroom Units:	3 Bedroom Units:	4 Bedroom Units:
5732	5709	158	954	2692	1650	48

Source: HUD User

Figure 21 and Figure 22 illustrate the locations of publicly assisted developments throughout Collier County.

Table 55: Collier County Affordable Developments

Project Name:	Address:	City:	State:	ZIP Code:	Total Number of Units:	Total Low-Income Units:
GARDEN LAKE OF IMMOKOLEE	1022 GARDEN LAKE CIR	IMMOKALEE	FL	34142	65	65
IMMOKALEE RRH	913 N 18TH ST	IMMOKALEE	FL	34142	41	41
COLLEGE PARK	6435 COLLEGE PARK CIR	NAPLES	FL	34113	210	210
SANDERS PINES	2411 SANDERS PINE CIR	IMMOKALEE	FL	34142	40	40
OAKHAVEN APTS	580 OAKHAVEN CIR	IMMOKALEE	FL	34142	160	160
SUMMER GLEN	1012 SUMMER GLEN BLVD	IMMOKALEE	FL	34142	45	45
WINDSONG CLUB	11086 WINDSONG CIR	NAPLES	FL	34109	120	120
JASMINE CAY	100 JASMINE CIR	NAPLES	FL	34102	72	72
BEAR CREEK - NAPLES	2367 BEAR CREEK DRIVE	NAPLES	FL	33942	120	120
OSPREYS LANDING	100 OSPREYS LANDING	NAPLES	FL	34104	176	176
SAXON MANOR ISLES APTS	155 MANOR BLVD	NAPLES	FL	34104	128	127
VILLAS OF CAPRI	7725 TARA CIR	NAPLES	FL	34104	235	235
TURTLE CREEK APTS	1130 TURTLE CREEK BLVD	NAPLES	FL	34110	269	268
TIMBER RIDGE OF IMMOKALEE	2711 WILTON CT	IMMOKALEE	FL	34142	34	34
CYPRESS POINT	5560 LAUREL RIDGE LN	NAPLES	FL	34116	78	78
LAUREL RIDGE	5460 LAUREL RIDGE LN	NAPLES	FL	34116	78	78

Project Name:	Address:	City:	State:	ZIP Code:	Total Number of Units:	Total Low-Income Units:
MEADOW LAKES I	105 MANOR BLVD	NAPLES	FL	34104	128	128
HERON PARK	2105 SCRUB OAK CIR	NAPLES	FL	34112	248	248
SAXON MANOR ISLES APTS PHASE II	245 MANOR BLVD	NAPLES	FL	34104	124	124
MEADOW LAKES II	105 MANOR BLVD	NAPLES	FL	34104	124	124
SADDLEBROOK VILLAGE	8625 SADDLEBROOK CIR	NAPLES	FL	34104	140	140
WHISTLER'S COVE	11420 WHISTLERS COVE CIR	NAPLES	FL	34113	240	237
WHISTLER'S GREEN	4700 WHISTLERS GREEN CIR	NAPLES	FL	34116	168	168
WILD PINES OF NAPLES II	2580 WILD PINES LN	NAPLES	FL	34112	104	104
BRITTANY BAY	14820 TRIANGLE BAY DR	NAPLES	FL	34119	182	182
HERITAGE	4310 JEFFERSON LN	NAPLES	FL	34116	320	320
BRITTANY BAY II	14925 LIGHTHOUSE RD	NAPLES	FL	34119	208	208
NOAH'S LANDING	10555 NOAHS CIR	NAPLES	FL	34116	264	262
SUMMER LAKES	5520 JONQUIL LN	NAPLES	FL		140	140
TUSCAN ISLE	8650 WEIR DR	NAPLES	FL	34104	298	298
GEORGE WASHINGTON CARVER	350 TENTH ST N	NAPLES	FL	34102	70	70
IMMOKOLEE SENIOR I	702 N 11TH ST	IMMOKALEE	FL	34142	30	30
SUMMER LAKES II	5600 JONQUIL CIRCLE	NAPLES	FL	34109	276	276

Project Name:	Address:	City:	State:	ZIP Code:	Total Number of Units:	Total Low-Income Units:
BROMELIA PLACE	612 N 11TH ST	IMMOKALEE	FL	34142	30	30
CRESTVIEW PARK	2903 LAKE TRAFFORD RD	IMMOKALEE	FL	34142	208	
CRESTVIEW PARK II	715 CRESTVIEW DR	IMMOKALEE	FL	34142	96	96
EDEN GARDENS	1375 BOXWOOD DR	IMMOKALEE	FL	34142	51	51
					5320	5105

Figure 21: Subsidized Housing Locations

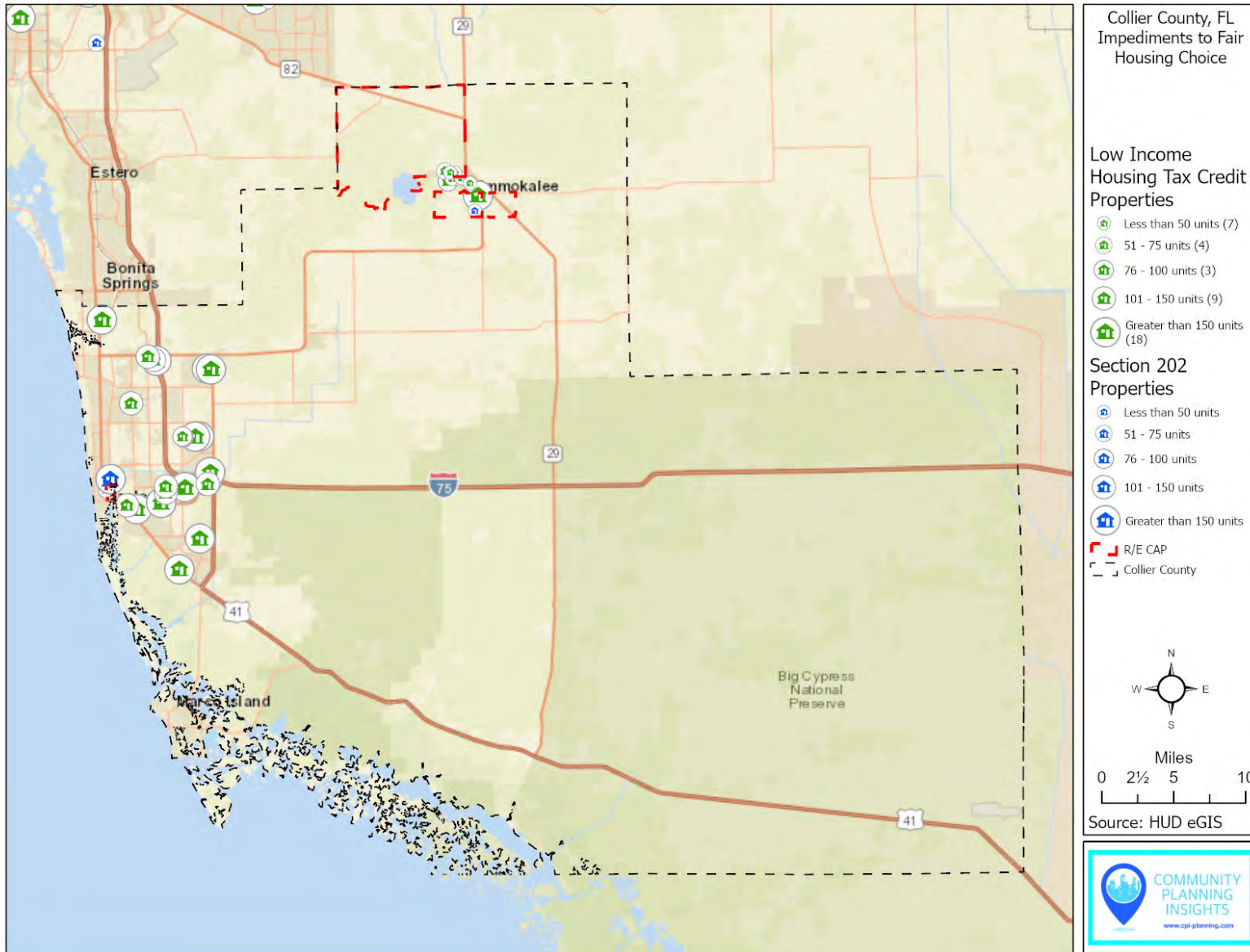
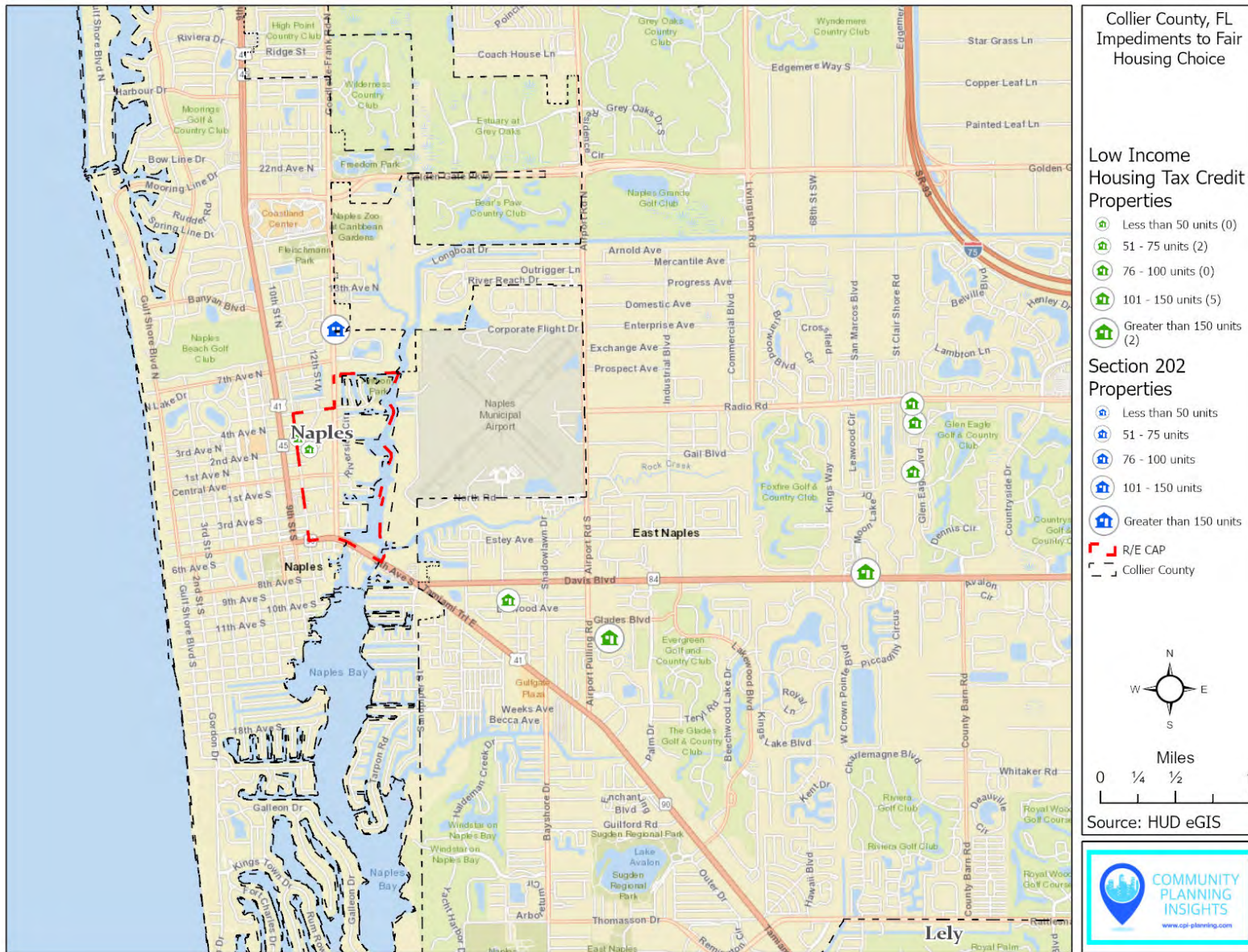


Figure 22: Subsidized Housing - Naples Area



Conditions

Growing evidence shows that housing stability and location can significantly affect health care costs, access, and outcomes. Research has shown that interventions to help families improve the condition of their housing or move to healthier neighborhoods improve people's health status. Poor-quality housing or housing located in under-invested neighborhoods can worsen health outcomes. Contaminants such as lead paint and mold, unkept or unsanitary living conditions, and deteriorating buildings can lead to childhood or adult asthma, brain injuries or developmental disabilities, preventable infections, or trips and falls that can result in injury and premature death (Baily, 2020). Residents in low-income areas may also struggle more with the cost of upkeep of older housing stock, leaving them especially vulnerable to the health impacts of poor housing quality. (Health N. L., 2021).

In 1978, the federal government banned consumer use of lead-based paint. Elevated blood lead levels are associated with impaired brain and nerve functioning, slowed development in children, behavior problems, and academic underachievement.

According to previous Consolidated Annual Performance and Evaluation Reports (CAPER), lead is a minor issue due to the young age of the housing stock. Rental rehabilitation programs operate within the HUD Lead-Safe Housing regulations addressing issues through code compliance. The County also ensured that staff is appropriately trained in lead-based paint, pamphlets are distributed, inspections and assessments are conducted when required, and that contractors trained in lead safe practices are used.

Table 56 indicates that 18.8% of Collier Counties occupied units were built in 1979 or prior. In Immokalee, 36.3% were built in 1979 or prior and 47.6% in Naples. Figure 23 shows where the percent of housing units built in 1979 or prior with children under the age of 6 in Collier County while Figure 24 shows housing units for Naples.

Collier County's Health Department has historically monitored and responded to all suspected cases of lead poisoning. Prior to issuing a Notice to Proceed or beginning any type of project, CHS completes an Environmental Review (ER). In addition to the requirements outlined in the ER, the potential for lead-based paint is always addressed. When a structure is identified as built prior to 1979, a separate review is completed. A specialist is hired to review the possibility of lead-based paint within the structure.

If lead-based paint is found in the structure, all individuals doing renovations, repairs and painting are required to be certified to safely complete improvements beyond minor repairs. The County follows procedures as specified in applicable regulations and, specifically, those detailed in Title X. The Department and its representatives provide all required notifications to owners and occupants. All Department policies and procedures have been revised to conform to Title X.

All projects carried out with federal funds incorporate the current procedures for hazard reduction or lead-based paint abatement guidelines as defined in 24 CFR Part 35 and Section 302(c) of the Lead-Based Paint Poisoning and Prevention Act (42 U.S.C. 4822). These procedures govern projects contracted to subrecipients and developers and funded by CDBG, HOME, and ESG. (County, Collier County Division of Community and Human Services, 2021)

Table 56: Year Structure Built

Collier County				Immokalee			Naples		
Total Units	142,979			5,985			10,797		
Year Built	Total	Owner	Renter	Total	Owner	Renter	Total	Owner	Renter
2014 or later	5.50%	5.90%	4.30%	3.70%	1.20%	5.30%	2.90%	3.40%	1.20%
2010 - 2013	2.70%	3.20%	1.50%	3.50%	3.20%	3.80%	2.60%	3.10%	1.00%
2000 - 2009	25.70%	27.60%	20.40%	27.40%	37.40%	21.30%	11.60%	13.10%	6.10%
1980 - 1999	47.40%	46%	51.30%	29.00%	29.00%	29.10%	35.10%	31.70%	47.60%
1960 - 1979	16.70%	15.70%	19.20%	30.50%	23.80%	34.60%	39.80%	41.10%	35.30%
1940 - 1959	1.80%	1.40%	2.80%	4.80%	4.90%	4.70%	6.70%	6.60%	7.30%
1939 or earlier	0.30%	0.30%	0.40%	1.00%	0.50%	1.30%	1.10%	1.10%	1.40%
1979 or prior	18.80%	17.40%	22.40%	36.30%	29.20%	40.60%	47.60%	48.80%	44.00%

Source: 2019 ACS 5-Year Estimates

Figure 23: Collier County Lead Based Paint Risk

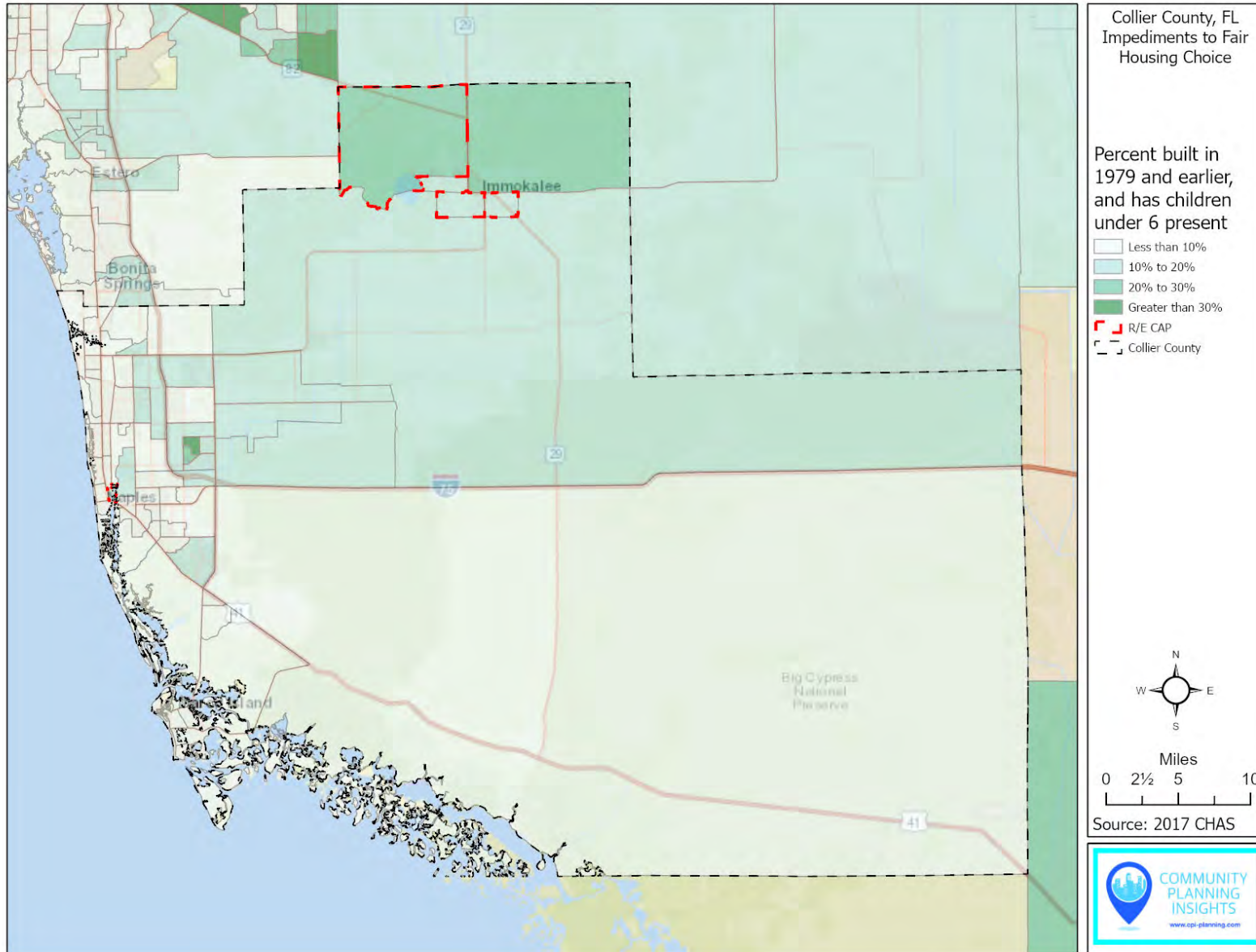
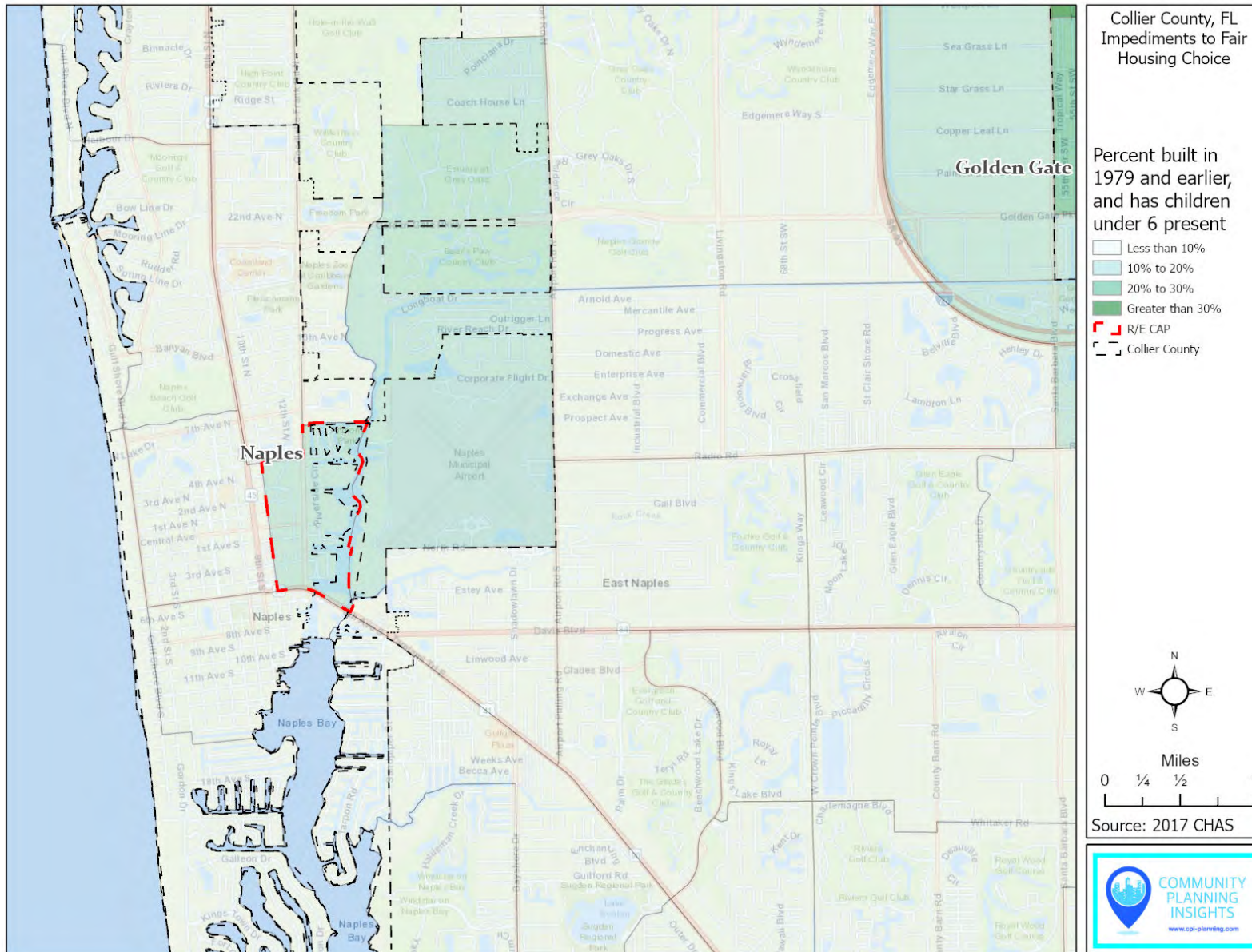


Figure 24: Lead Based Paint Risk - Naples Area



Other Severe Housing Problems

The primary purpose of the Comprehensive Housing Affordability Strategy (CHAS) data is to demonstrate the number of households in need of housing assistance. This is estimated by the number of households that have certain housing problems and have income low enough to qualify for HUD's programs (primarily 30%, 50%, and 80% of median income). It is also important to consider the prevalence of housing problems among different types of households, such as the elderly, disabled, minorities, and different household types. The CHAS data provides counts of the numbers of households that fit these HUD-specified characteristics.

In addition to estimating low-income housing needs, the CHAS data contributes to a more comprehensive market analysis by documenting issues like lead paint risks, "affordability mismatch," and the interaction of affordability with variables like age of homes, number of bedrooms, and type of building. (HUD, Policy Development & Research - CHAS, 2021)

There are four housing problems in the CHAS data:

1. housing unit lacks complete kitchen facilities
2. housing unit lacks complete plumbing facilities
3. household is overcrowded, and
4. household is cost burdened.

A household is said to have a housing problem if they have any 1 or more of these 4 problems. According to HUD data, a significant percentage of residents throughout Collier County experience housing needs, defined by HUD as cost burden, severe cost burden, overcrowding, and incomplete kitchen or plumbing facilities. The rate of these needs vary by group and location.

Table 57 illustrates the number of households with housing problems by race, ethnicity and tenure. Nearly 28,000 owner households and nearly 21,000 renter households have a housing problem. The vast majority of households with housing problems are White. However, Black households have a substantially greater need compared to the overall population. Nearly 50% of Black homeowners have a housing problem, and nearly 2/3rds of Black renter households have a housing problem. Nearly 70% of Hispanic renters have a housing problem.

An expert-led focus group was conducted with Immokalee residents for the needs and assets assessment indicated a shortage of low-income housing and too many regulations and requirements force poor families to live in dilapidated housing (mostly trailers) owned by landlords who lack concern for tenants, the neighborhoods, and the community interests. Rent abuse and overcrowding are prevalent in their community. Many families do not meet the requirements for low-income housing, like the housing available in Habitat Village, but still cannot afford suitable housing. Horizon Village provides affordable housing for single agricultural laborers, but many choose not to live there due to strict rules and regulations. Conversations with the Haitian community indicate that these issues are greater for the community (Research, 2021).

Table 57: Housing Problems by Race/Ethnicity and Tenure

	Owner occupied				Renter occupied			
	Has a Housing Problem		No Housing Problem		Has a Housing Problem		No Housing Problems	
	Households	%	Households	%	Households	%	Households	%
White alone, non-Hispanic	22,025	78.9%	61,530	87.3%	10,405	49.3%	11,310	67.2%
Black or African-American	1,190	4.3%	1,145	1.6%	2,670	12.7%	1,075	6.4%
American Indian or Alaska Native	18	0.1%	64	0.1%	8	0.0%	115	0.7%
Asian	225	0.8%	770	1.1%	169	0.8%	90	0.5%
Pacific Islander	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other (including multiple races)	60	0.2%	545	0.8%	110	0.5%	79	0.5%
Hispanic, any race	4,400	15.8%	6,400	9.1%	7,735	36.7%	4,165	24.7%
Total	27,918	100.0%	70,454	100.0%	21,097	100.0%	16,834	100.0%

Source: 2013-2017 CHAS

Table 58: Cost Burden by Race/Ethnicity and Tenure

	Owner occupied				Renter occupied			
	30% to 50%		Greater than 50%		30% to 50%		Greater than 50%	
	Households	%	Households	%	Households	%	Households	%
White	10,845	79.65%	10,630	85.05%	5,335	54.75%	4,370	48.32%
Black or African-American	675	4.96%	270	2.16%	925	9.49%	1290	14.26%
American Indian or Alaska Native	10	0.07%	4	0.03%	0	0.00%	4	0.04%
Asian	70	0.51%	120	0.96%	115	1.18%	45	0.50%
Pacific Islander	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other (including multiple races)	45	0.33%	15	0.12%	70	0.72%	40	0.44%
Hispanic, any race	1,970	14.47%	1,460	11.68%	3,300	33.86%	3,295	36.43%
Total	13,615	100.00%	12,499	100.00%	9,745	100.00%	9,044	100.00%

Source: 2013-2017 CHAS

Figure 26 and Figure 26 shows where severe housing problems are in and around Immokalee. Problems are primarily located in Collier County and or around R/ECAP and surrounding areas.

Table 59 Illustrates the type of housing problem by income and tenure. Cost burden is the most frequent housing problem among both renters and homeowners. A significant number of households in Collier County are also living in overcrowded conditions. Approximately 1,755 homeowners are living in overcrowded conditions, and approximately 4,185 renters are living in overcrowded conditions, and 1,145 of those renters are in severely overcrowded situations.

Figure 25: Severe Housing Problems

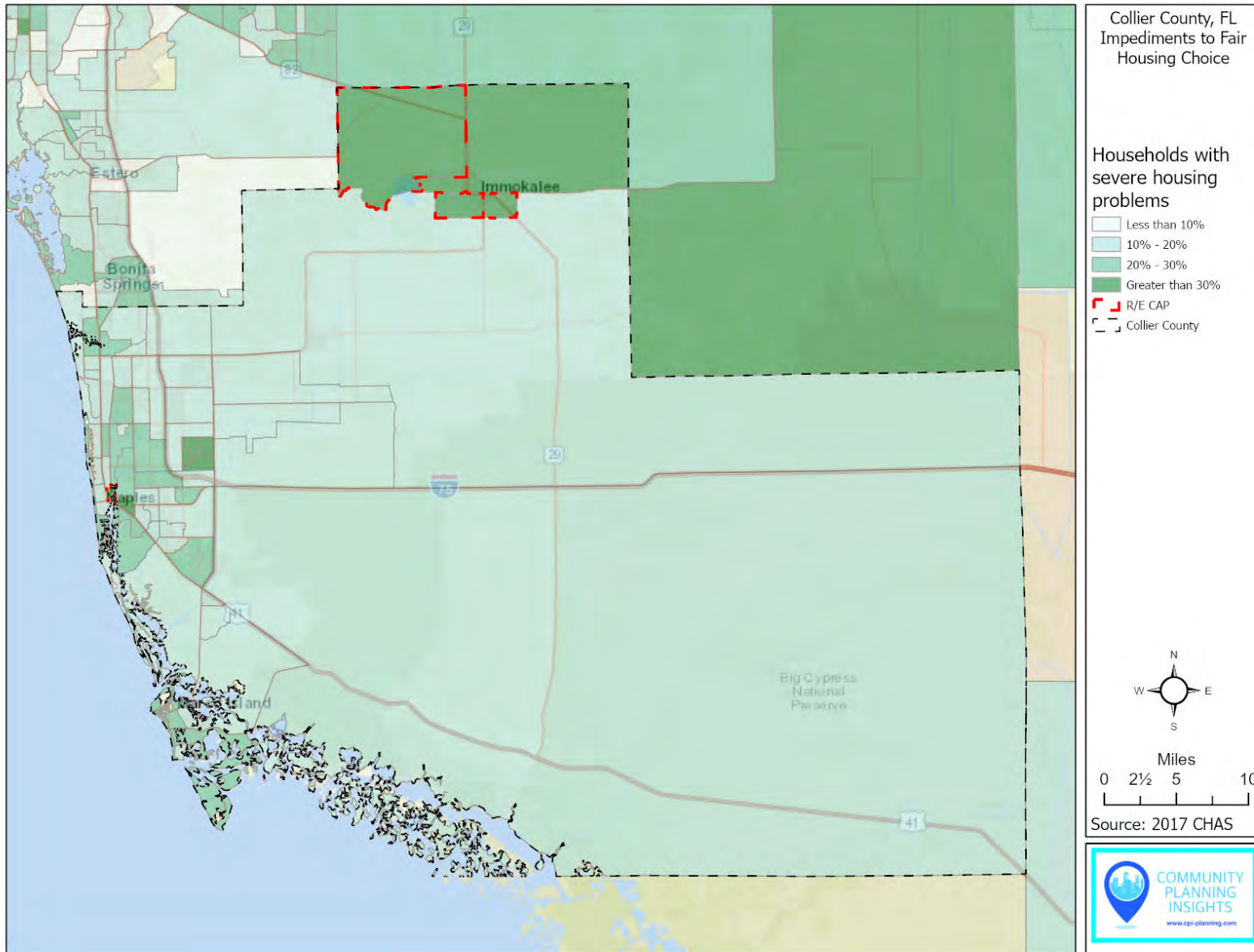


Figure 26: Severe Housing Problems - Naples Area

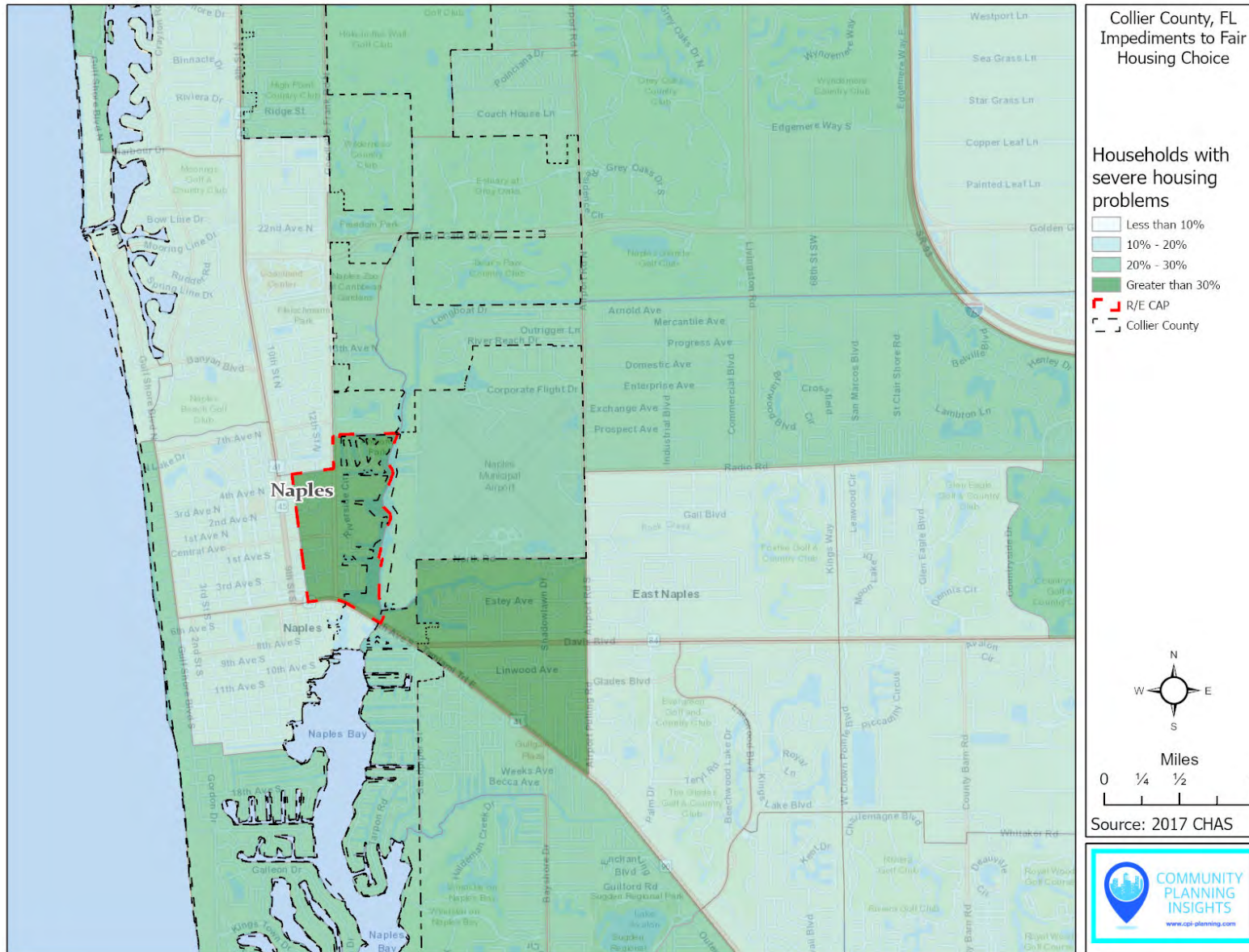


Table 59: Housing Problem by Type and Income

Income and Housing Problem	Owner occupied	Renter occupied	Total
Less than 30% AMI	5,030	4,930	9,960
Lacking complete plumbing or kitchen facilities	30	245	275
Cost burden 30% to 50%	725	240	965
Cost burden greater than 50%	4,115	3,495	7,610
One to 1.5 persons per room	115	665	780
More than 1.5 person per room	45	285	330
30% to 50% AMI	5,360	5,925	11,285
Lacking complete plumbing or kitchen facilities	35	145	180
Cost burden 30% to 50%	2,220	1,755	3,975
Cost burden greater than 50%	2,780	2,765	5,545
One to 1.5 persons per room	280	880	1,160
More than 1.5 person per room	45	380	425
50% to 80% AMI	7,265	6,100	13,365
Lacking complete plumbing or kitchen facilities	115	395	510
Cost burden 30% to 50%	3,630	3,690	7,320
Cost burden greater than 50%	3,075	980	4,055
One to 1.5 persons per room	430	755	1,185
More than 1.5 person per room	15	280	295
80% to 100% AMI	3,545	1,980	5,525
Lacking complete plumbing or kitchen facilities	65	105	170
Cost burden 30% to 50%	2,190	1,330	3,520
Cost burden greater than 50%	1,110	200	1,310
One to 1.5 persons per room	135	325	460
More than 1.5 person per room	45	20	65
Greater than 100% AMI	6,710	2,160	8,870
Lacking complete plumbing or kitchen facilities	170	175	345
Cost burden 30% to 50%	4,590	1,190	5,780
Cost burden greater than 50%	1,305	200	1,505
One to 1.5 persons per room	505	415	920
More than 1.5 person per room	140	180	320
Total	27,910	21,095	49,005

Source: 2013-2017 CHAS

Lending

The National Community Reinvestment Coalition (NCRC) provided an analysis of mortgage lending in Collier County, Florida for 2018 and 2019. The data included in this section comes from the Home Mortgage Disclosure Act (HMDA) dataset and was downloaded from the Consumer Finance Protection Bureau (CFPB) website.

Mortgage Lending 2018-2019

Based on the CFPB estimates this dataset includes 88% of all mortgage lending in the United States. Unless otherwise mentioned this analysis is focused on site-built, 1-4 unit, owner-occupied homes. Preapprovals, reverse mortgages, and loans on manufactured homes are excluded. In 2018-2019 there were a total of 48,549 loan application records (LAR) reported in Collier County by depository institutions, independent mortgage lenders, and credit unions. Of those, 37,052 met the above criteria.

Owner Occupancy

Typically, owner-occupied lending dominates local housing markets. In 2018-2019 in the U.S. as a whole, 91.1% of all loan records reported in HMDA were to owner-occupants. In Collier County during this same period, this figure falls to 77.8%. This is a substantial portion of the lending in the county and suggests that a large share of both mortgage credit and housing is reserved for second homes and investment properties. Collier County is 189th out of 3,220 counties nationally for the percent of mortgage applications that are not being used to finance the owners' primary residence. In Collier County, the share of loans that were originated for owner-occupants was even lower, with just 74.2% being made on the owner's primary residence.

Among originated loans, an analysis of loan purpose was even starker. Just 67.9%, or 10,244 loans, were originated to facilitate the purchase of an owner-occupied primary residence in 2018 and 2019 combined.

The mortgage market in Collier County is dominated by home purchase lending, with 54% of 2019 originations being home purchase loans. This was a decline from the 2018 data when 59% of originations were for a home purchase. This is a trend seen nationally during this time period, as low-interest rates have favored refinance lending.

Table 60: Owner Occupied Loan Applications

	Activity Year		
	2018	2019	Total
Loan originated	8,104	9,924	18,028
Application approved but not accepted	487	547	1,034
Application denied	3,517	3,491	7,008
Application withdrawn by applicant	2,220	2,644	4,864
File closed for incompleteness	696	831	1,527
Purchased loan	2,507	2,084	4,591
Total	17,531	19,521	37,052

Source: NCRC 2021 Report

However, in terms of overall number, there was an increase in home purchase activity in 2019. There were 4,767 home purchase loans in Collier County in 2018, and 5,385 in 2019. Refinance lending increased at a much sharper rate during this period. There were just 907 refinance loans in 2018 and 1,941 in 2019. Smaller increases were also reported in cash-out refinance loans and home equity loans, with a small decrease in home improvement lending.

Table 61: Owner Occupied LAR Purpose

Loan Purpose	Applications		
	2018	2019	Total
Home Purchase	4,767	5,385	10,152
Refinance	907	1,941	2,848
Cash Out Refi	1,114	1,301	2,415
Home Equity	670	684	1,354
Home Improvement	639	600	1,239
NA	7	13	20
Total	8,104	9,924	18,028

Source: NCRC 2021 Report

Low-to-Moderate Income Lending

Lending in low- and moderate-income census tracts is far lower than the share of the population that lives in these neighborhoods suggests is warranted. According to the 2015 5-year American Community Survey (ACS) data used by HMDA there are 341,091 people living in Collier County. An estimated 30.7% of those are in census tracts where the median family income is under \$62,640, a threshold that HUD considers to be low or moderate-income. These residents make up over 21,000 families, 25% of all families in the County. In 2018-2019 just 16.2% of mortgage originations were made in these census tracts, and just 23.5% went to a low or moderate-income borrower.

Minority Lending

Lending to minority borrowers, defined as any borrower that identifies as Hispanic, Native American, Asian, Black, Hawaiian or Pacific Islander, or any combination thereof, was also lower than expected. About 45% of residents in Collier County identified themselves as one of these minorities and 20.2% of residents live in a majority-minority census tract (one that is less than 50% non-Hispanic White). Despite this, just 23% of all mortgage lending went to a minority borrower and 7% were made in a minority-majority census tract.

Table 62: Lending in Minority-Majority Census Tracts

MUI = Middle or Upper Income Minority Census Tracts	Minority Borrower		
	MUI	LMI	Total
MUI	13,393	3,354	16,747
LMI	481	780	1,261
Total	13,874	4,134	18,008

Source: NCRC 2021 Report

Investor Lending

Typically, owner-occupied lending dominates local housing markets. In 2018-2019 in the U.S. as a whole 91.1% of all loan records reported in HMDA were to owner-occupants. In Collier County during this same period, this figure falls to 77.8%. This is a substantial portion of the lending in the county as a whole, and suggests that a large share of both mortgage credit and housing is reserved for second homes and investment properties.

Collier County is 189th out of 3,220 counties nationally for the percent of mortgage applications that are not being used to finance the owners' primary residence. In Collier County, the share of loans that were originated for owner-occupants was even lower, with just 74.2% being made on the owner's primary residence, 20.9% were for second homes, and 4.7% were for investment properties.

Among originated loans, an analysis of loan purpose was even starker. As Table 63 illustrates, just 67.9%, or 10,152 loans, were originated to facilitate the purchase of an owner-occupied primary residence in 2018 and 2019 combined.

Table 63: Loan Origination Purpose and Occupancy Type

Occupancy Type	Loan Purpose						NA	Total	
	Home Purchase	Refinance	Cash Out Refi	Home Equity	Home Improvement				
Owner Occupied	10,152	2,848	2,415	1,354	1,239	20	18,028	74.2%	
Second Home	3,980	506	253	239	126		5,104	21.0%	
Investor	816	141	131	33	30	2	1153	4.7%	
Total	14,948	3,495	2,799	1,626	1,395	22	24,285		

Source: NCRC 2021 Report

A comparison of select characteristics of these loans between those made to owner occupants and investors is also interesting, as Table 64 illustrates. Loans on second homes or investment properties are over 34% of all loans originated in the county as a whole. Those loans tend to be much less likely to be originated to LMI or minority borrowers. In addition, very few of these loans are originated in majority-minority census tracts. However, 15.4% of loans to investors were made in LMI census tracts, virtually identical to the 16.2% of owner-occupied loans in those areas.

Table 64: Loan Purpose by Tract and Borrower Characteristics

1-4 units, site built homes				
	Owner Occupied	Investment/Second Home	Owner Occupied	Investment/Second Home
Originations	18,028	6,257		
LMI Borrower	23.5%	4.3%	4,241	271
LMI Census Tract	16.2%	15.4%	2,925	966
Minority Borrower	23.0%	8.0%	4,144	502
Minority Census Tract	7.0%	4.8%	1,261	302
Avg. Property Value	\$538,768	\$687,357		
Avg. Income	\$150,000	\$371,000		

Source: NCRC 2021 Report

Lending in LMI Census Tracts

In those LMI census tracts over 78% of loans to investors were to purchase a home, compared with just 60% of loans to owner occupants. This could mean that investors are increasingly seeking homes in the LMI census tracts of Collier County and are buying homes that would otherwise be available to local residents. A long-term trend analysis of investor activity in Collier County, and cash buyers in these census tracts, would be required to further explore.

Table 65: Lending in LMI Census Tracts

Loan Purpose	Occupancy Type (group)		
	Owner Occupied	Investment/Second Home	Total
Home Purchase	60.0%	78.3%	64.6%
Cash Out Refi	13.7%	6.4%	11.9%
Home Equity	6.5%	3.1%	5.6%
Home Improvement	5.9%	2.5%	5.0%
NA	0.0%	0.1%	0.0%
Refinance	13.9%	9.6%	12.9%

Source: NCRC 2021 Report

In general, owner-occupants financing a home purchase in Collier County appear to be at a disadvantage compared with investors, who overall are purchasing higher value properties and have higher incomes. They are also more likely to be non-Hispanic White. Minority owner-occupants were just 41% of borrowers in Collier County during 2018 and 2019. Among loans to investors or second homeowners that falls to just 11.8%.

Table 66: Lending by Race / Ethnicity

Race and Ethnicity	Occupancy Type (group)		
	Owner Occupied	Investment/Second Home	Grand Total
White	51.0%	75.3%	57.0%
No Data	8.0%	12.9%	9.3%
Asian	1.0%	1.6%	1.1%
Black	5.7%	1.4%	4.6%
Hawaiian or Pacific Islander (HoPI)	0.1%	0.0%	0.1%
Hispanic	33.9%	8.6%	27.6%
Native American	0.3%	0.2%	0.3%
Minority	41.0%	11.8%	33.7%

Source: NCRC 2021 Report

Manufactured Housing

Manufactured housing represents a total of just .5% of mortgages originated in Collier County in 2018-2019. The 127 originations on manufactured homes are a small sample but it is useful to compare them with site-built homes across a number of variables. As Table 67 illustrates, 48% of manufactured home borrowers were low- or moderate-income households, compared with just 18.8% of site-built home buyers.

Similarly, manufactured home mortgages are far more likely than site-built loans to be in LMI census tracts, have a minority borrower, or be made in a majority-minority census tract. The average property value for manufactured homes is less than 1/3 of that of site-built properties, and the average loan amount on these homes is well under half the average loan amount on site-built properties. Over 84% of the loans on manufactured homes were conventional, despite the fact that LMI and minority borrowers tend to rely on higher cost government insurance programs such as FHA to finance their homes. Manufactured home borrowers are also much older than borrowers on site-built properties, with 65% of them over the age of 55.

Table 67: Loan by Construction Method

Originations in Collier County 2018-2019		
	Construction Method	
	Manufactured	Site Built
Originations	127	24,426
Low to moderate income borrower	48.00%	18.80%
Low to moderate income census tract	33.10%	16.10%
Minority borrower	25.20%	19.10%
Minority census tract	25.20%	6.50%
Avg. Interest Rate	6.09%	4.51%
Avg. Property Value	\$199,779	\$620,499
Avg. Loan Amount	\$143,425	\$377,033
Loan Type	Construction Method	
	Manufactured	Site Built
Conventional	84.25%	83.90%
FHA	10.24%	11.93%
VA	5.51%	3.53%
RHS		0.64%

Source: NCRC 2021 Report

Reverse Mortgages and Multifamily Lending

Reverse mortgages account for just 96 of the loan originations reported in 2018 and 2019. These loans are typically open to homeowners aged 62+ and are underwritten by a small group of lenders under the HECM program through HUD. Low- and moderate-income borrowers represent the majority of reverse mortgage borrowers, both nationally and in Collier County, where 85 of the 96 were low or moderate income. However, few of these homes appear to be in LMI census tracts or have a minority borrower or be located in a minority census tract.

Table 68: Reverse Mortgage Originations

Reverse Mortgage Originations in Collier County 2018-2019	
Originations	96
Low- or Moderate-Income Borrower	85
Low- or Moderate-Income Census Tract	6
Minority Borrower	8
Minority Census Tract	4

Source: NCRC 2021 Report

Multifamily lending reported under HMDA includes an indicator of the number of units in the property that are considered to be “affordable”. HMDA includes the percentage of affordable units listed in the application. The CFPB releases these figures as a percentage of all property units, and units are reported in buckets (e.g.: 5-24 units, 25-50, etc). “Affordable” is defined as the percent of units that are “income-restricted pursuant to Federal, State, or local affordable housing programs.” This will not include units where the occupant receives a subsidy, such as a Section 8 housing voucher or other support.

Notably, 18 of the loans financed properties with over 149 units. Of those loans, two went to properties that were approximately 50% affordable and two others to buildings that reported 100% of their units met this criteria.

Table 69: Multi-Family Lending

Multifamily Originations	Percent of Units Considered Affordable							
	Total Units (No Data	0%	2%	51%	52%	100%	Total
Collier County, Florida	5-24	14	1				1	16
	25-49	4						4
	50-99	1	3					4
	100-149		2				1	3
	>149	1	12	1	1	1	2	18
Total		20	18	1	1	1	4	45

Source: NCRC 2021 Report

Other Relevant Data

Schools, Education, and Social Services

Collier County Public Schools

The School District of Collier County serves 48,000 total students in 29 elementary schools, 10 middle schools, 8 high schools, and a PreK-12 school. There are also 13 Alternative School Programs. The District employs approximately 3,200 highly qualified teachers, 49% with advanced degrees.

English is not the first language for nearly 16% of students with more than 7,500 (K-12) students in the English Language Learners (ELL) program. Collectively, these students speak 104 different heritage languages and hail from 76 different countries of origin. More than 46% of students live in non-English homes, where English is not the first language and sometimes is not even spoken. The percentage increases to nearly 56% in grades PreK through 3 (Schools, 2021).

The District School Board of Collier County is responsible for all public schools in Immokalee including five elementary schools, Immokalee Middle School and Immokalee High School. iTECH technical college and Bethune Education Center provide additional training. RCMA Charter School and Pace Center for Girls are also in the community and provide alternative education programs. Ave Maria University is approximately 6 miles away in the community of Ave Maria (CRA, 2021).

In 2019, 64% of all students are on free and reduced lunch in CCPS compared to 49% in 2009 (University, 2021). During the 2017-18 school year, there were 1,367 children and teens in CCPS who were homeless. This represented an increase from 2013-14 with 849 homeless students (University, 2021). Approximately 35% of seniors pay more than 30% of their income for housing. Of those, 19% spend more than 50% (University, 2021).

Education and Social Services

The needs and assets assessment indicated a shortage in quality early childhood and after school programs in the Immokalee areas. After school programs require a recommendation to get in. Daycare arrangements with family lack quality and are not licensed. Due to the non-traditional hours of agricultural hours, there are no alternative childcare services that meet the needs of residents. Middle schools suffer from high teacher turnover rates because of housing cost and shortages resulting in students being taught by teachers that are inadequately trained. There is also a need for night classes for adults in Immokalee since inadequate transportation options make it difficult to access classes in Naples. According to the assessment, these issues are exacerbated for the Haitian community due to cultural barriers (Research, 2021).

Figure 27: Naples Area School Locations

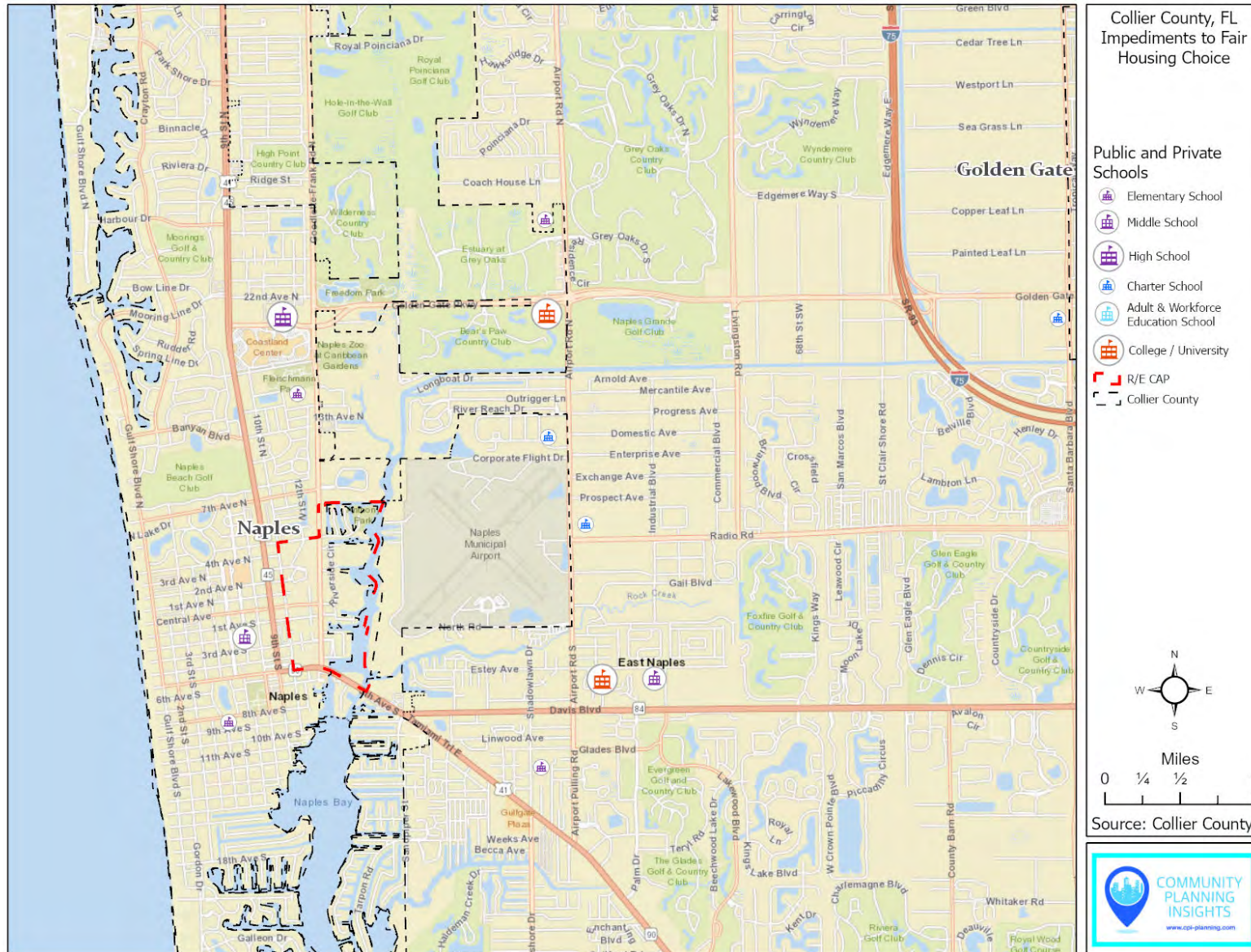
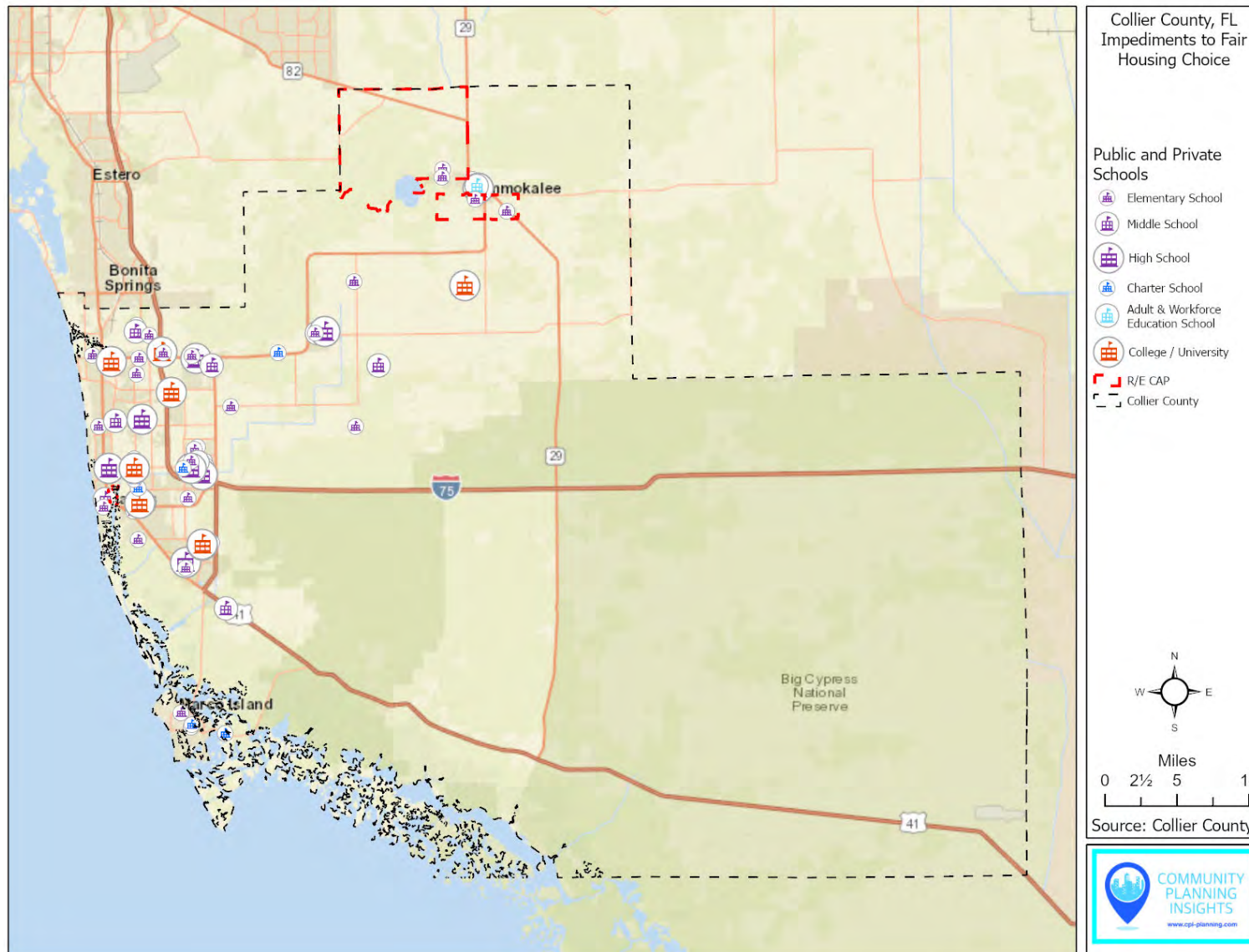


Figure 28: School Locations



Computer and Internet Access

The COVID-19 pandemic has clearly shown that high-speed internet is necessary as many children were forced into distance learning situations due to closed schools. Classes were held virtually, with many using streaming video technology. Platforms like Zoom and WebEx need high-speed internet to function well. Lack of internet access will continue to exacerbate the wealth gap between neighborhoods, especially as remote learning and work from home become more the norm, and not the exception. Recent data also reveals that students are struggling in a virtual learning environment which will have long-term economic implications.

Access to a computer and internet access does not only impact a child’s ability to participate in virtual learning, but also impacts a person’s ability to work from home. In 2019, 6.6% of households in Collier County had no computer and 14.4% were without an internet subscription compared to 24% and 45.10% in Immokalee and 7.6 % and 14.8% in Naples. Table 70 shows families with no internet or computer access based on income.

Table 70: Internet Access by Income

No Internet/Computer by Income	Collier County		Immokalee		Naples	
	Households		Households		Households	
Less than \$20,000	4,757	32.30%	839	55.80%	498	39.40%
\$20,000 - \$74,999	10,721	17.60%	1,610	43.40%	524	17.70%
\$75,000 and up	5,151	7.70%	249	32.40%	571	8.70%
No internet	20,629	14.40%	2,698	45.10%	1,593	14.80%
No computer	9,454	6.60%	1,438	24.00%	825	7.60%

Source: 2019 ACS 5-Year Estimates

Table 71 shows that Blacks, Hispanics, and Native Indian/Alaska Natives have disproportionately less internet and computer access.

In Collier County and Naples, there is significant disparity in internet access among Black families compared to the rest of the population. In Immokalee, the disparity exists with Black and Hispanics compared to the rest of the population.

Table 71: Internet Access by Race and Ethnicity

	Collier County		Immokalee		Naples	
Population	367,367		25,847		21,493	
	No Internet	No Computer	No Internet	No Computer	No Internet	No Computer
White	6.60%	3.70%	6.40%	18.00%	5.80%	4.10%
Black	46.80%	10.10%	28.90%	24.50%	31.40%	20.70%
American Indian/Alaska Native	10.10%	6.50%	19.50%	2.60%	0.00%	0.00%
Asian	2.10%	0.30%	0.00%	0.00%	0.00%	0.00%
Native Hawaiian/Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Some other race	9.20%	6.00%	21.90%	5.20%	5.40%	0.00%
Two or more races	8.60%	1.00%	42.50%	4.50%	5.40%	0.00%
Hispanic	11.80%	8.70%	23.50%	21.00%	6.70%	7.40%

Source: 2019 ACS 5-Year Estimates

Figure 29 and Figure 30 illustrates the percentage of households without internet connections.

Figure 29: Internet Access

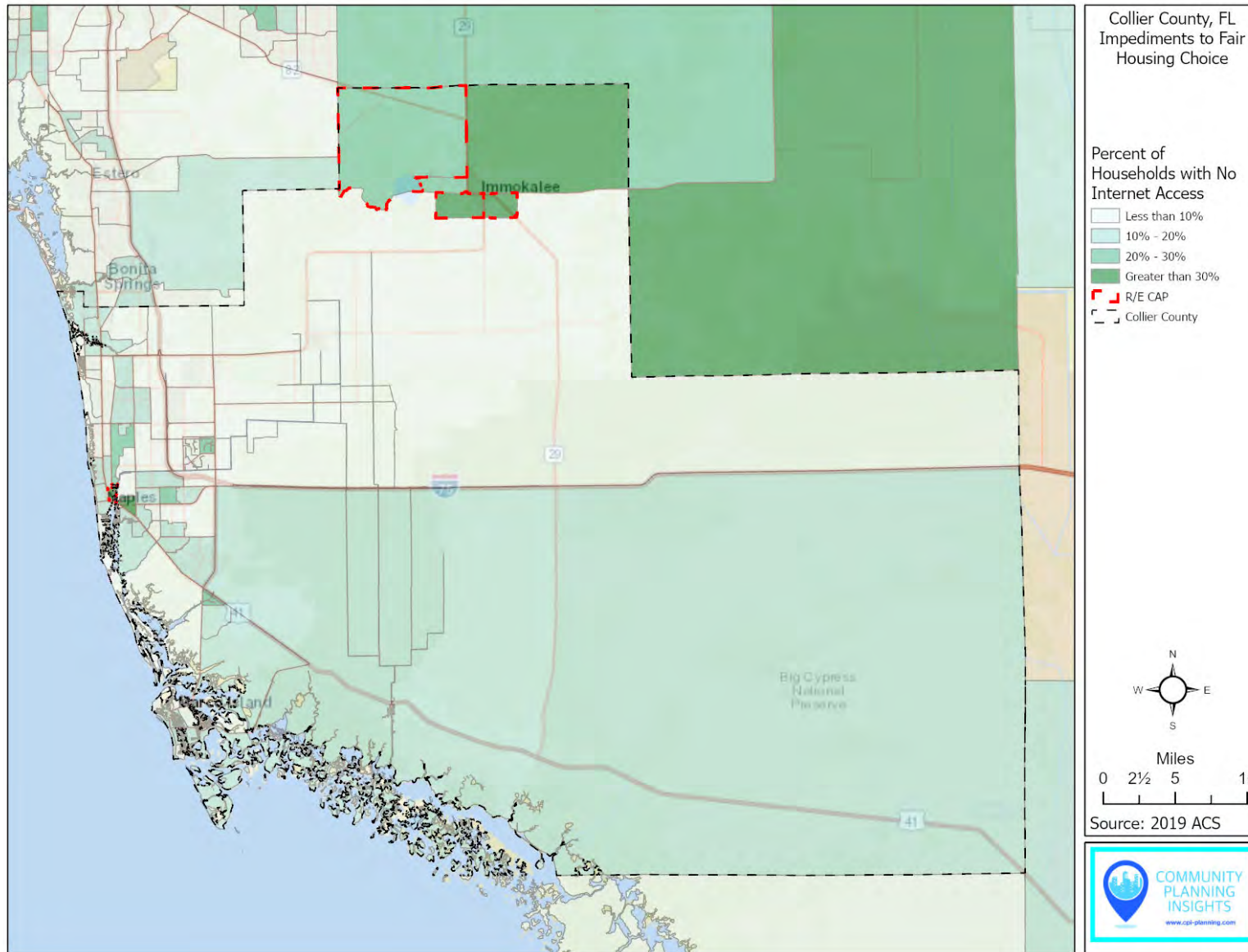
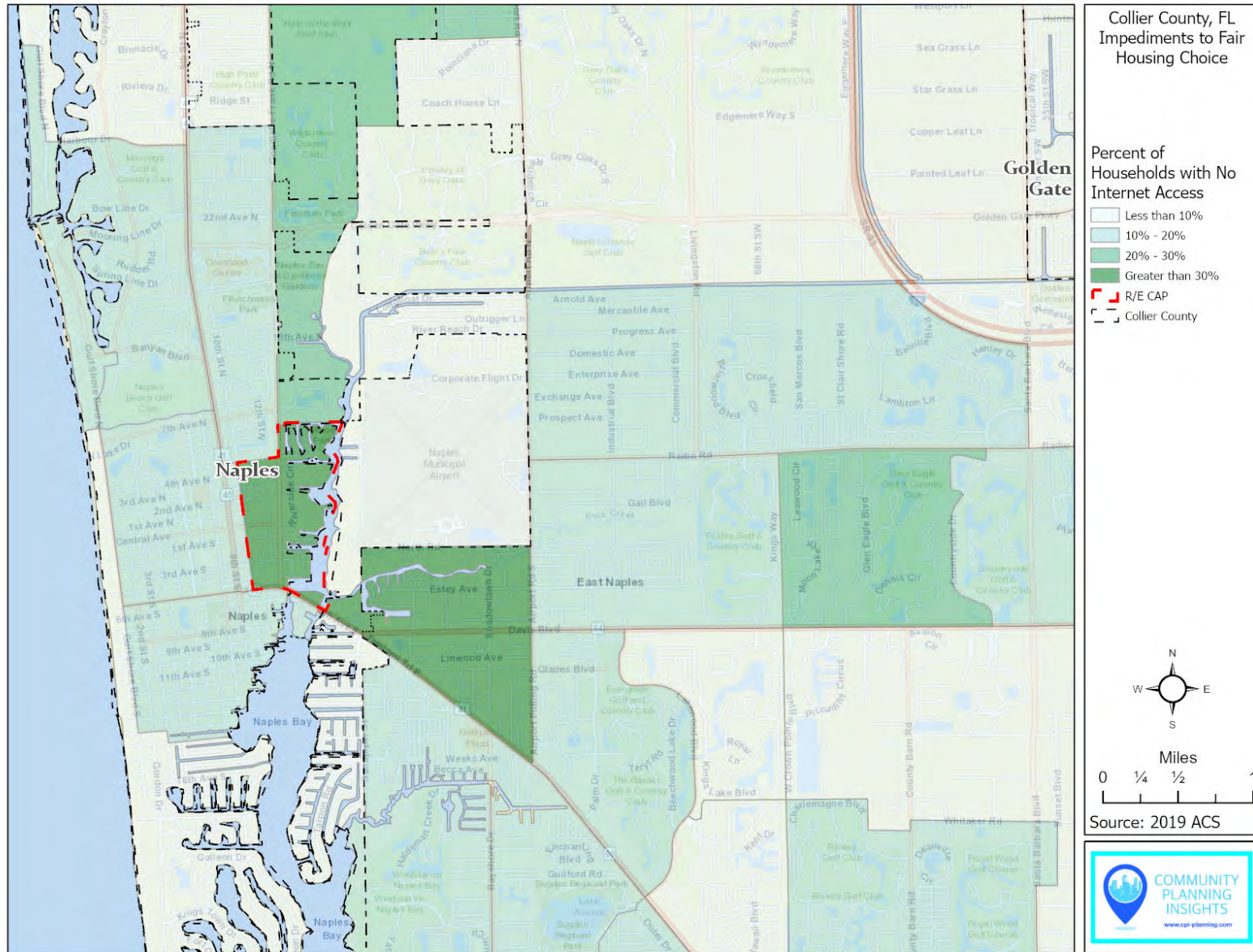


Figure 30: Internet Access - Naples Area



Recreation

Collier County

Access to parks has been associated with better mental and physical health, lower death rates, and improved social connection. Research has shown that green space may increase physical activity, reduce stress, improve quality of life, and improve mental health across different groups of people. (Health N. L., 2021) In 2018, Collier County updated its 10-Year Parks & Recreation Master Plan, which was initially prepared in 2011.

The Collier County Parks & Recreation Division oversees 69 neighborhood, community, and regional parks serving active and passive recreation needs totaling 1,772 acres, as summarized in Table 72. Collier County also has interlocal agreements with the Collier County School Board to allow for public use of facilities at several schools for recreational purposes during non-school hours.

Table 72: Collier County Parks

Park Type	No.	Acreage
Neighborhood	15	29.35
Community	26	594.74
Regional	28	1,148.28
Total	69	1,772.37

Source: 2018 Master Plan

NOTE: Inventory does not include 50-acre Naples Zoo park acreage associated with City of Naples or City of Marco Island Parks.

Through its parks system, Collier County provides:

- 26 community/recreation centers, fitness centers/gyms, older adult centers, and other facilities
- 50 water access points, including fishing piers/docks, boat ramps, etc.
- 69 sports fields for baseball, softball, soccer, football, and other sports
- 167 sports courts for pickleball, basketball, racquetball, tennis, and other sports
- 6 aquatic facilities (splash parks, swimming pools, Sun N Fun Lagoon water park), including new East Naples swimming pool
- Other various facilities such as a rink, a BMX track, two skate facilities, trails, picnic pavilions, playgrounds, etc.

Collier County offers a range of recreation, health, fitness, art, and other programs at 13 of its parks/facilities and four non-park locations throughout the county. Collier County's *R.E.A.L. Guide* (Recreation Education Activities Leisure), published quarterly, provides information on the 600+ programs offered by the Parks & Recreation Division. Elementary day camp, leadership training, gym memberships, and fitness classes are some of the more frequently offered programs among the facilities. The County offers Adaptive Inclusive Recreation (AIR) which is community-based recreation activities and inclusive programs for children, teens, and adults with disabilities and/or special needs.

Naples

Naples has its own parks system and facilities complementary to those provided by Collier County. The City provides over 138 acres of active and passive park lands. The following are highlights from the Naples *Citizen's Guide* referenced in the 2015 Naples Parks & Recreation Master Plan:

- The Edge Johnny Nocera Skate Park is located in Fleischmann Park and provides 43,000 square feet of skating, boarding, and biking space, including a 14,000-square-foot concrete bowl, pool, and snake run. There is also an 18,000-square-foot course and a 9,000-square-foot street course, both with various structural skate elements.
- Naples Preserve is located on US 41 near the Coastland Mall and is an elevated boardwalk with observation decks, benches, and a 0.4-mile self-guided tour through an ecosystem that once included most of early Naples.
- Arthur L. Allen Tennis Center, located on 8th Street South and Cambier Park, is an award-winning public tennis facility in Old Naples that is professionally staffed and full-service, offering programming and facilities for various ages and skill-levels. The Center has 12 state-of-the-art courts, 2 of which are equipped with additional lighting to accommodate professional exhibition or tournament play. The Center also includes shade structures, water fountains, and a tennis shop with refreshments and gear. Programming includes leagues, clinics, lessons, and social events.
- Fleischmann Park is located off Fleischmann Boulevard directly south of the Coastland Center Mall food court entrance and is approximately 15 acres. Outdoor amenities include The Edge Johnny Nocera Skate Park, 4 racquetball courts, 3 baseball fields, 2 sand volleyball courts, 2 basketball courts, a football field, a playground with water splash area, illuminated walkways around the park for walking/jogging, picnic shelters, and open play areas. The Community Center includes multi-purpose rooms for meetings, dances, martial arts, social clubs, games, parties and gymnastics, a game room, an indoor rock-climbing wall, and restrooms.
- Norris Community Center, located on the south end of Cambier Park on 8th Street South, has an auditorium with a stage, two meeting rooms, a dance studio, a conference room, a game room, an art gallery, and an amphitheater. The center offers cultural and recreation classes, including creative arts, adult dance, acting, languages, and martial arts. During holidays are camp programs and special performances for families. The center is home to Gulfshore Playhouse and other local performance groups.
- Lowdermilk Park is a beachfront park with metered and unmetered parking, a concession stand, sand volleyball courts, two children's playgrounds, restrooms, and showers and two gazebos for rent.
- Naples Fishing Pier is located on the Gulf of Mexico at the west end of 12th Ave South. It features a concession stand with a covered eating area, restrooms, and beach supplies. Fishing from the Naples Pier does not require a license. Parking locations include on-

street, a parking lot one block east, and spaces at the beach ends of avenues to the north and south. The beach at the pier features volleyball nets.

Bikeways are particularly important in that they allow for increased distances comfortably traveled to and from parks and recreation destinations. Many parks are near some type of active transportation infrastructure, but there is not always strong connectivity to the rest of the network or the grade of infrastructure (a paved shoulder versus a bike lane, for instance) could be improved. Parks that are more disconnected from the existing trail/bike system or that may need a higher grade of infrastructure include:

- Immokalee area parks
- Barefoot Beach Access and Preserve
- Corkscrew Elementary/Middle School
- Sabal Palm School
- Palmetto Elementary School
- Port of the Islands
- Oilwell Park
- Copeland Panther Neighborhood Park
- Poinciana Village Neighborhood Park

Improving the infrastructure and connections to ensure they accommodate bikes, as well as ensuring that parks and conservation land outside the urbanized areas have adequate active transportation connections, are important considerations. The general connectivity of parks to transit is low, given that only one-third of neighborhood, community, and regional parks are within a quarter-mile walking distance to a bus stop (County, Collier Parks, 2021).

Residents believe there is adequate access to recreation and leisure opportunities such as parks and beaches, and adequate availability of arts/cultural programming. Residents did express concerns regarding affordability. Immokalee residents were more likely to disagree that there is adequate access to recreational activities (Research, 2021).

Figure 31: Collier County Recreation Facilities

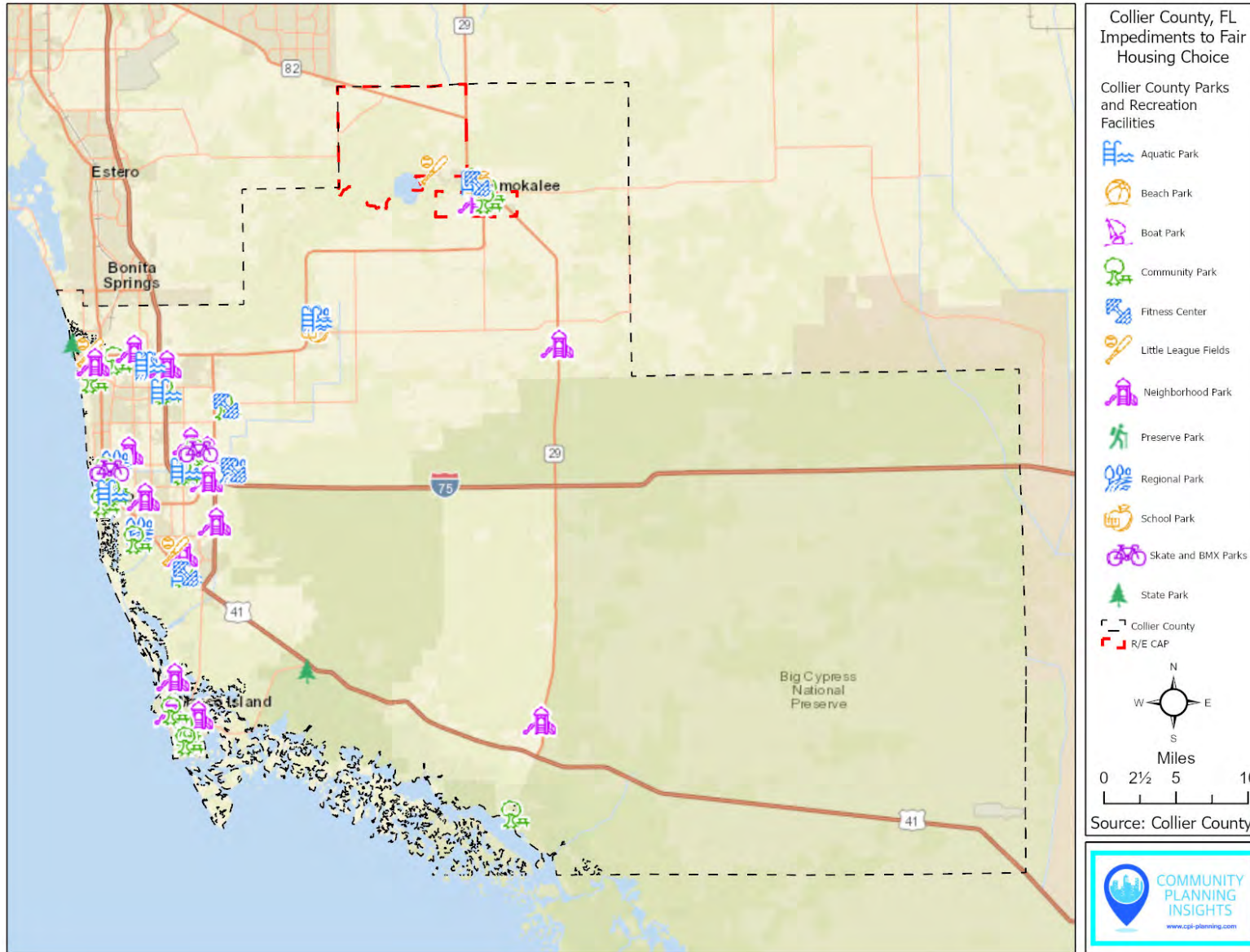
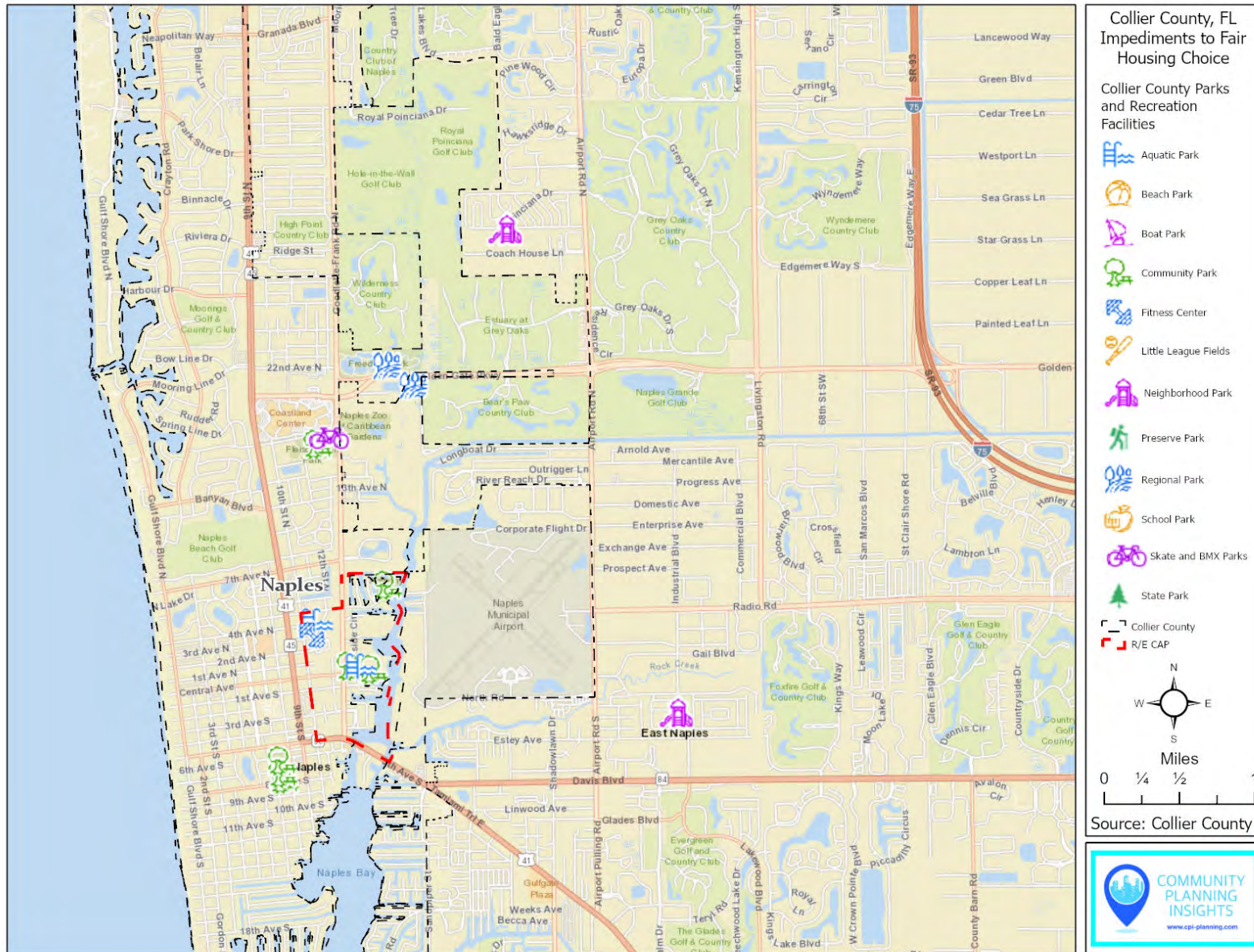


Figure 32: Collier County Recreation Facilities - Naples Area



Public Safety

There was a very modest (1.3%) increase in Part 1 crimes between 2018 and 2019 reported by the Collier County Sheriff’s Office, which serves the unincorporated areas of Collier County. Homicide, aggravated assault and burglary all saw declines. Rape, robbery, larceny and vehicle thefts were up year over year. Table 73 illustrates the number of crimes between January and June 2020, the most recent data available through the State of Florida. Overall, county residents believe the community to be safe. Immokalee residents are more concerned with safety issues in their community (Research, 2021).

Table 73: Part 1 Crimes

Semi-Annual Report	Year	Total Crimes	% Change	Murder	Rape	Robbery	Aggravated Assault	Burglary	Larceny	Motor Vehicle Theft
Collier County	2019	2,671		5	62	64	282	229	1,868	161
	2020	2,439	-8.7	2	48	67	306	199	1,659	158
Collier County Sheriff’s Office	2020	2,226	-8.3	2	45	65	289	187	1,499	139
Naples Police Department	2020	147	-17.9	0	1	1	9	6	116	14
Marco Island Police Department	2020	60	-6.2	0	2	1	7	6	39	5
DOC Inspector General - Collier	2020	0		0	0	0	0	0	0	0
DABT - Collier	2020	0		0	0	0	0	0	0	0
FWC - Collier	2020	0		0	0	0	0	0	0	0

Source: Florida Department of Public Safety

Gun Violence

Gun violence increased between 2018 and 2019 by 11.3%. In 2019, there were 168 Part 1 crimes committed with a firearm, compared to 151 in 2018. Firearms used in robberies increased by 28% and firearms used in aggregated assault crimes increased by 9.3%.

Small/Micro-Business Development

According to the 2012 Survey of Business Owners, there are 40,670 firms in Collier County. Table 74 shows the types of firms. Minority firms make up 27% of total firms compared to 37.2% of the population. Women-owned firms make up 34% of total firms, while females are approximately 51% of the population.

Table 74: Collier County Business Firms

Type of Firm	Total firms	% of Firms
Total Firms	40,670	
Men-owned firms	22,178	55%
Women-owned firms	13,667	34%
Minority-owned firms	10,945	27%
Nonminority-owned firms	28,411	70%
Veteran-owned firms	4,236	10%
Nonveteran-owned firms	34,539	85%

Source: 2012 Survey of Business Owners

Access to Healthcare

According to the Collier County needs and assets assessment, most children in Florida have health coverage through KidCare, and Federally Qualified Health Care Centers (FQHCs) offer affordable medical care, dental, eye care and mental health services to children in Collier County. Through a unique program, NCH health care system, which encompasses the largest local hospital and several specialized health care centers, has placed nurses in all schools and uses tele-medicine, sharing costs with the school system. Group participants felt that access to pediatric specialists is limited, and getting time off from work to take children to doctor's appointments is a challenge.

From 2007 to 2016, the percent of adults unable to see a doctor due to cost steadily increased in the County. The total healthcare expenditure in Collier County is \$4,800 per family compared to \$4,339 in Florida. This is projected to increase to \$6,894 per family in the County compared to \$6,270 in the Florida by 2024 (University, 2021).

Although the ratio of Primary Care Physicians (PCP) providers to residents is higher than that of the state, Collier County has a PCP provider shortage for the Immokalee/Everglades service area. According to the needs and assets assessment, there is a movement of PCPs in Collier County to become concierge providers. Concierge providers ask patients to pay an annual retainer (usually between \$1,500 – \$5,000) which is not covered by insurance carriers. This allows patients direct access to their physician, with many extra benefits. Due to the highly personalized nature of the practice, most concierge medical practices limit their patient base, and this trend is creating an access issue within the community. In addition, residents experience long wait times to see a physician during peak season. The assessment reported

limited access to women’s reproductive healthcare services. Transportation was also stated as a barrier for low-income residents (Research, 2021).

Health insurance coverage is associated with increased labor force participation and higher incomes. Disparities persist in insurance coverage as racial/ethnic minorities and people in lower income brackets are less likely than the general population to be insured. According to the national County Health Rankings, 23% of Collier County residents under the age of 65 are without health insurance (Institute U. o., 2021). Table 75 shows uninsured by employment status while Table 76 shows uninsured by income.

Table 75: Uninsured by Employment Status

Employment Status	Collier County		Immokalee		Naples	
	Total	%	Total	%	Total	%
In Labor Force	143,849	26.00%	11,901	63.20%	5,752	11.60%
Employed	138,518	24.90%	10,763	60.50%	5,589	11.30%
Unemployed	5,331	56.70%	1,138	89.20%	163	22.70%
Not in Labor Force	40,710	25.50%	3,656	63.60%	2,601	8.90%

Source: 2019 ACS 5-Year Estimates

Table 76: Uninsured by Income

Income	Collier County		Immokalee		Naples	
	Total	%	Total	%	Total	%
Under \$25,000	39,280	22.50%	6,901	39.30%	2,487	15.80%
\$25,000 - \$49,999	70,703	20.50%	8,878	42.70%	2,411	7.80%
\$50,000 - \$74,999	72,663	20.10%	5,690	45.60%	2,031	15.00%
\$75,000 - \$99,999	50,847	13.70%	1,579	43.40%	2,125	6.10%
\$100,000 and over	133,768	8.00%	2,799	48.70%	12,439	1.10%

Source: 2019 ACS 5-Year Estimates

Table 77 shows that men are more likely to be uninsured than women. It was estimated that approximately 16.5% of residents in Collier County could not see a doctor due to costs (Research, 2021). Table 78 provides an overview of the percentage of the population uninsured by age. Health insurance rates vary by age and gender.

Table 77: Uninsured by Gender

Gender	Collier County		Immokalee		Naples	
	Total	%	Total	%	Total	%
Male	181,734	17.40%	14,022	49.70%	9,906	6.70%
Female	187,859	13.40%	12,575	38.00%	11,632	4.30%

Source: 2019 ACS 5-Year Estimates

Table 78: Uninsured by Age

Age	Collier County		Immokalee		Naples	
	Total	%	Total	%	Total	%
Under 6	19,894	6.20%	2,608	10.00%	519	7.50%
Under 19	68,489	11.30%	9,054	19.20%	1,920	10.90%
65 and over	116,545	1.00%	1,986	8.30%	11,265	0.50%

Source: 2019 ACS 5-Year Estimates

Older, low-income adults have adequate Medicare and Medicaid coverage. According to the group, some seniors still face coverage gaps when it comes to skilled residential care. There is a shortage of beds in these types of facilities. The lack of assisted living facilities (ALFs) discussed previously with respect to housing is also a healthcare concern, as ALFs provide housing and health care. Recently, Hurricane Irma revealed a shortage of shelters and inadequate infrastructure to care for older adults with medical needs in residential placements during emergencies. The health experts stated that outside of the elderly, low-income adults in the county include large numbers of uninsured residents who did not qualify for ACA and suffer from chronic health and mental health problems.

Other concerns included access to mental health services. Focus group participants indicated that the county's sheriff's office has the highest rates of referrals (Research, 2021). According to the needs and assets assessment, the percentage of non-profits registered as health or mental health in 2016 was lower than the rate for the State of Florida (Research, 2021).

Table 79 indicates that Hispanics followed by Whites are disproportionately uninsured.

Table 79: Uninsured by Race and Ethnicity

	Collier County		Immokalee		Naples	
	Households	%	Households	%	Households	%
Total	56,744	15.40%	11750	44.20%	1,160	5.40%
White	16,738	7.20%	4.89%	43.10%	508	2.70%
Black/African American	5,579	22.20%	16.38%	33.80%	262	28.50%
American Indian/Alaska	274	40.70%	2.14%	71.90%	-	0.00%
Asian	513	10.60%	0.00%	0.00%	17	9.40%
Native Hawaiian/Pacific Islander	32	100.00%	0.00%	0.00%	-	0.00%
Some Other Race	2,007	35.00%	4.57%	50.90%	12	12.90%
Two or More Races	334	6.90%	0.49%	14.70%	-	0.00%
Hispanic Populations	33,523	32.40%	76.71%	47.00%	373	36.10%

Source: 2019 ACS 5-Year Estimates

Overall, county residents believe the community to be healthy. However, residents who do struggle with their health and have issues such as chronic illness, substance abuse, and obesity are predominately located in the Immokalee area (Research, 2021).

Figure 33: Uninsured Population

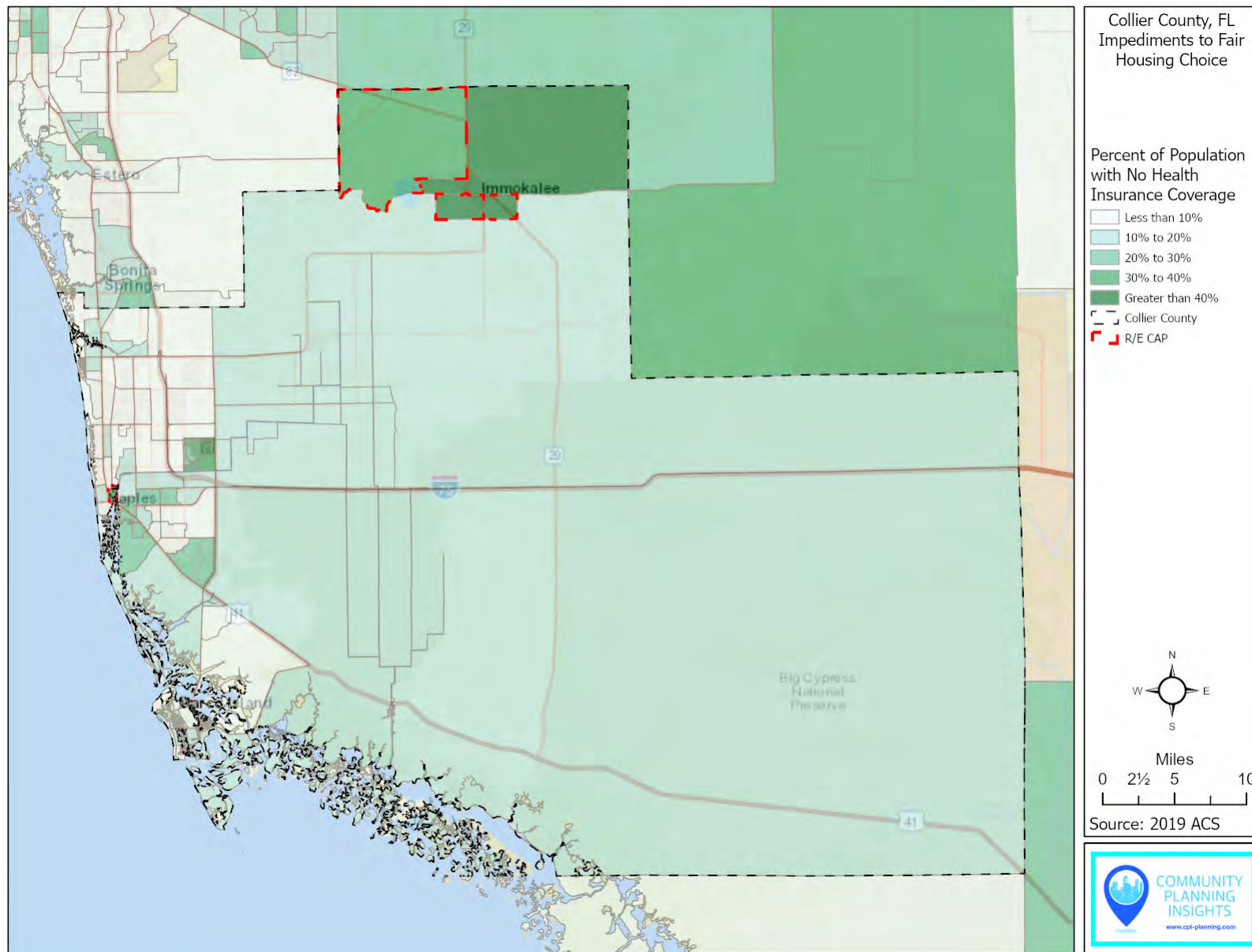
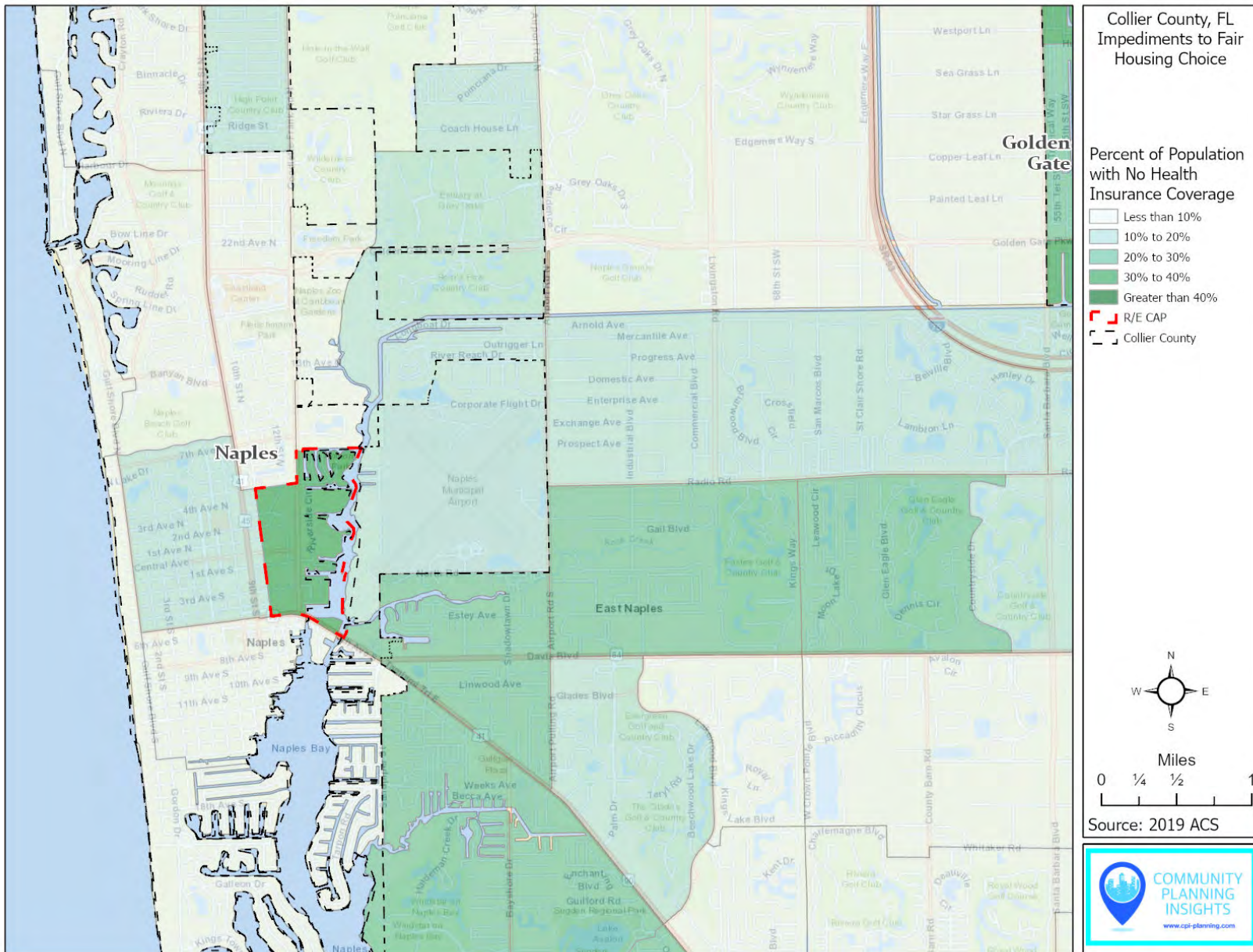


Figure 34: Uninsured Population



Community Health Needs Assessment

Hospitals are required to conduct a community health needs assessment every three years and adopt an implementation strategy to meet the community health needs to maintain their tax-exempt status. To assess the health needs of its community, a hospital facility must identify the significant health needs of the community. It must also prioritize those health needs and identify resources potentially available to address them. Resources can include organizations, facilities, and programs in the community, including those of the hospital facility, potentially available to address those health needs.

The health needs of a community include requisites for the improvement or maintenance of health status, both in the community at large and parts of the community, such as particular neighborhoods or populations experiencing health disparities. Needs may include, for example, the need to:

- Address financial and other barriers to accessing care,
- Prevent illness,
- Ensure adequate nutrition, or
- Address social, behavioral, and environmental factors that influence health in the community.

NCH Healthcare System is an alliance of more than 700 independent physicians and medical facilities in dozens of locations throughout Collier County and southwest Florida. NCH completed a health needs assessment in August of 2019 (Health F. , 2021). The top five priority health rankings in 2019 were:

1. Mental Health
2. Chronic Disease (heart disease, diabetes, cancer)
3. Access to Care
4. Alcohol and Drug Use
5. Health of Older Adults

In 2016, the top five priority health rankings were:

1. Chronic Disease (heart disease, diabetes, cancer)
2. Mental Health
3. Access to Care
4. Alcohol and Drug Use
5. Obesity

Section 3: Identification of Impediments to Fair Housing Choice Public and Private Sector

Public Sector

Public sector policies and practices have the potential to negatively impact housing choices of individuals and should be periodically reviewed to examine if implementation has created barriers to housing choice. This section evaluates the public and private sector policies that may impact fair housing choice including, but not limited to zoning and land development codes, infrastructure and transportation policies, property tax and other tax policies, and efforts to expand the supply of affordable housing in the jurisdiction.

Zoning and Land Use Planning

The 2016-2020 Analysis of Impediments to Fair Housing study indicated there were few impediments related to the zoning and land development codes. In fact, the Naples zoning code does have density bonuses for affordable housing. The codes do not unduly restrict or eliminate the ability to develop higher-density housing such as apartment buildings, which can be more affordable than traditional single-family homes.

The 2017 CHP made a number of recommendations related to zoning and development regulations. These recommendations included:

- Identify “Strategic Opportunity Sites” for Higher Densities.
- Require Activity Centers to include residential development. These mixed-use districts were originally conceived to have a mixture of uses, including residential, concentrated near job and transportation centers. The plan states “This would have several benefits including providing housing opportunities in/near commercial job centers and developing residential properties at higher densities providing diversity in the residential development pattern of Collier County. These residential units would not be restricted or monitored for affordability, but rather would serve to provide a diverse supply of housing types and options.”
- Allow higher densities in Activity Centers & Strategic Opportunity Sites above the current limits (i.e. 20 – 25 units / acre).
- Modify the existing Affordable Housing Density Bonus (AHDB) program to allow higher densities to 12 units per acre.
- The county adopt and implement a locally designed and controlled Mixed Income Housing Ordinance.
- Establish or Increase Administrative Approvals.
- Allow commercial conversion near targeted transportation and job centers at high density; using SDP approval only. It is recommended that for developments proposing to include housing that is affordable through a commercial to residential conversion be approved administratively through the SDP process. Allow affordable densities by right. Affordable Housing Density Bonuses up to 4 units to the acre to be approved administratively throughout the urban area.
- Require Senior Living Facilities requesting a FAR above .45 to include 20% of the beds as affordable or Medicare beds.
- Create local development codes to suite small single-family units.
- Expedite the Permitting and Approval Process for affordable housing projects.
- Explore cost-saving infrastructure changes.
- Adopt a form-based Smart Code.

Impact fees

Collier County imposes an impact fee for most land development projects. In general, impact fees generate current one-time revenue to pay for future anticipated service costs due to the impacts that may be a result of new developments. Collier County's impact fees support the following public services:

- Community Parks
- Regional Parks
- Roads
- EMS (Emergency Medical Services)
- Schools
- Government Buildings
- Libraries
- Law Enforcement
- Jails
- Water and Sewer services

Collier County's residential impact fees are largely based on the type of housing (single family, multifamily, assisted living, retirement communities, etc.) and size (living area, number of units and floors, etc.) of the development. There are a number of studies Collier County has commissioned to determine the impacts and the subsequent fee amount.

The cost of Collier County's impact fees on a development can be substantial. For example, a 45-unit, 3-story apartment building, a fairly typical size of a senior building low- and moderate-income development incurs an impact fee of nearly \$500,000.00. Additionally, Collier County's impact fees are regressive, meaning they have a larger impact on lower-cost developments and arguably a greater impact on low- and moderate-income residents. For example, an 880 square foot mobile home built to HUD specifications costs between \$50,000 - \$60,000.00 (not including land and delivery). The Collier County impact fee for that size mobile home to be set in the Immokalee Fire District is \$20,631.00. In this example, the impact fee increases the cost of affordable housing between 34% and 41% (the lower the cost of housing, the higher the percent increase). These fees artificially inflate the cost of developing affordable housing.

The County offers a very limited partial fee deferral for non-profit organizations that provide housing to low- or moderate-income citizens (not residents). However, the impact fees deferrals are simply a deferral at the sole discretion of the county and limited to up to \$100,000.00. The deferral is only for up to 10-years and ultimately that fee must be paid. These fees are regressive and increase the cost of affordable housing.

Publicly Assisted Housing and Housing Choices for Voucher Holders

There are relatively few housing options for extremely low-income residents and voucher holders in Collier County. There are 12,925 renters earning less than 80% AMI who are cost burdened, yet there are just 5,700 subsidized units in Collier County. The need is further demonstrated by a Section 8 waiting list time of over four years, and a lack of renter turnover in assisted housing units. The average length of stay was over nine years, which indicates a lack of housing options for many low-income residents.

Sale of Subsidized Housing and Possible Displacement

The development of affordable housing in Collier County has not kept pace with demand and any conversion to market rate due to the sale or non-renewal of Section 8 contracts will further exasperate the affordable housing shortage. Over the next five years, approximately 1,287 subsidized units will have reached the end of their compliance period or Section 8 contract. This represents slightly over 22% of the existing subsidized units in the County.

Private Sector

Lending Policies and Practices

Lending in low- to-moderate income census tracts is far lower than the share of the population that lives in these neighborhoods suggests is warranted. According to the 2015 5-year American Community Survey (ACS) data used by HMDA there are 341,091 people living in Collier County, and 30.7% of those are in census tracts where the median family income is under \$62,640, a threshold that HUD considers to be low or moderate-income. These residents make up over 21,000 families, 25% of all families in the County. In 2018-2019 just 16.2% of mortgage originations were made in these census tracts, and just 23.5% went to a low or moderate-income borrower.

Lending to minority borrowers, defined as any borrower that identifies as Hispanic, Native American, Asian, Black, Hawaiian or Pacific Islander, or any combination thereof, was also lower than expected. About 45% of residents in Collier County identified themselves as one of these minorities and 20.2% of residents live in a majority-minority census tract (one that is less than 50% non-Hispanic White). Despite this, just 23% of all mortgage lending went to a minority borrower and 7% were made in a minority-majority census tract.

In general, owner-occupants financing a home purchase in Collier County appear to be at a disadvantage compared with investors, who overall are purchasing higher value properties and have higher incomes. They are also more likely to be non-Hispanic White. Minority owner-occupants were just 41% of borrowers in Collier County during 2018 and 2019. Among loans to investors or second homeowners that falls to just 11.8%.

Public and Private Sector

Fair Housing Enforcement

Federal

It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. In February of 2021, fair housing protections were extended by executive order to cover sexual orientation and gender identity. (HUD, Press Releases, 2021) A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with limited English proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aids and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act. HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination and promote civil rights and economic opportunity through housing. FHEO enforces fair housing laws, including investigating complaints of discrimination. (HUD, FHEO, 2021)

A Fair Housing Assistance Program (FHAP) is an intergovernmental enforcement partnership between HUD and the state or local agencies. As in any partnership, both parties must contribute to the success of the program. The Fair Housing Act contemplates that, across the country, state and local governments will enact and enforce their own statutes and ordinances

that are substantially equivalent to the Fair Housing Act. HUD provides FHAP funding annually on a noncompetitive basis to state and local agencies that administer fair housing laws that provide rights and remedies that are substantially equivalent to those provided by the Fair Housing Act. A state or local agency may be certified as substantially equivalent after it applies for certification and HUD determines that the agency administers a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. A substantially equivalent agency's law may include additional protected classes. Typically, once certified, HUD will refer complaints of housing discrimination that it receives to the state or local agency for investigation. (HUD, Fair Housing Assistance Program, 2021) The Florida Commission on Human Relations serves as the FHAP agency for the area. Information on FHAP cases will be discussed in Section 3. (HUD, Fair Housing Assistance Program, 2021)

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 (FHAPs) that handle complaints of housing discrimination. They also conduct preliminary investigation of claims, including sending "testers" to properties suspected of practicing housing discrimination. 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, FHIPs also have initiatives that promote fair housing laws and equal housing opportunity awareness. (HUD, Fair Housing Initiatives Program, 2021)

State of Florida

The Florida Legislature created the Florida Commission on Human Relations in 1969 to enforce the Florida Civil Rights Act and address discrimination issues through education, outreach, and partnerships. The Florida Fair Housing Act was passed by the Florida Legislation in 1983 and amended in 1989. The Florida Commission on Human Relations basic statutory responsibilities are set forth in Chapter 760 of Florida Statutes which addresses the areas of employment discrimination based on race, color, religion, sex, disability, national origin, age, and marital status; and discrimination in housing based on race, color, national origin, sex, disability, pregnancy, religion, and familial status. The Act declares it illegal to discriminate in the sale, rental, advertising, and financing, or providing of brokerage services for housing. The state Act parallels the Federal Fair Housing Act and the Commission has been certified as a FHAP. The Commission also offers free mediation services. (Relations, 2021)

Noncompliance by HUD

No areas of noncompliance were identified.

Section 4: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

Evaluation of Jurisdiction’s Current Fair Housing Legal Status

Collier County adopted a Fair Housing Ordinance in 1986 and was amended in 1992. Furthermore, in 2003, the Board of County Commissioners (BCC) adopted a resolution opposing discrimination of all Collier County residents. The BCC directed the County Manager to establish and administer through the Communication and Customer Relations Department, an information and referral service to the public on matters affecting discrimination. The ordinance was reaffirmed on March 25, 2014.

The Housing and Grant Development Manager is the County’s fair housing administrator. The County investigates complaints related to developments funded by the County. All other complaints are directed to the Florida Commission on Human Relations, the state FHAP, or HUD. The County did not have any complaint data to provide. Complaint data was requested and provided by the FHAP. However, the FHAP indicated they could not provide data by protected class. The information was provided by the HUD Region IV office. The inability to access the information from the State FHAP raised some concerns given that in order to establish jurisdiction to file a complaint the Complainant must represent one of the protected classes.

Housing Opportunities Project for Excellence (HOPE), Inc. is the nearest FHIP agency. The consultant reached out to the agency to determine the willingness to provide service. It was communicated that there was not enough funding to sustain a local operation.

The limited fair housing advocacy and enforcement services available is concerning given the demographic and economic data and concerns regarding the availability of affordable housing.

Fair Housing Complaints and Compliance Reviews

Table 80: 2016 – 2020 Fair Housing Complaints by Basis

Basis	2016	2017	2018	2019	2020	Total	% of Total Cases
Race			1	1	2	4	9%
Color						0	0%
Religion					1	1	2%
National Origin	1		1	1	3	6	13%
Sex			2		2	4	9%
Familial Status		1	2	2		5	11%
Disability	3	2	8	8	9	30	64%
Retaliation				1		1	2%
Total Cases	3	3	12	12	17	47	

Source: HUD MicroStrategy Report

Table 81: 2016 – 2020 Fair Housing Complaints by Disposition

Disposition	2016	2017	2018	2019	2020	Total	% of Total Cases
No Cause	3		3	5	6	17	36%
Probable Cause						0	0%
Conciliation		1	3	2	8	14	30%
Dismissed - Jurisdiction		1				1	2%
Judicial Dismissal		1				1	2%
Complainant Failed to Cooperate			2	1		3	6%
Withdrawn			4	3	3	10	21%
Lack of Jurisdiction				1		1	2%
Total	3	3	12	12	17	47	

Source: HUD MicroStrategy Report

Review of the Status of 2016-2020 Impediments to Fair Housing Choice

Table 82: 2016-2021 Impediments to Fair Housing Choice Analysis

Recommendation	Activities	Comments
Impediment 1: Lack of Fair Housing Organization/Fair Housing Evaluation		
Award a competitive Fair Housing grant to an organization that will carry out a focused fair housing education program and activities to residents in the area.	Collier County provided funding to Legal Aid, Housing Education Lending Programs (HELP), and Eagle Rock. Organizations listed as providing fair housing services.	Could not find that the organizations had experience in fair housing or providing fair housing education.
Mandatory fair housing training for county staff, subrecipients, and any other entities the County may contract with under its entitlement program.	Collier County provides fair housing training for staff and subrecipients.	No indication that County staff is required to participate in training.
Fair housing training to educate landlords and property managers, real estate professionals, mortgage lenders by a HUD-approved Fair Housing organization and make the training mandatory for code enforcement violators.	Annual training for sub-recipients provided by County staff at the time of application and award.	
Develop fair housing marketing materials to be distributed at City Hall and other public venues.	Collier County developed pamphlets, which are available at city hall, libraries, and social service agencies.	
Publish contact information and referral information related to fair housing in local newspapers or advertise where to obtain fair housing information to local channels.	A dedicated housing website was created and information is published in legal notices.	

Recommendation	Activities	Comments
<p>Impediment 2: Limited Supply of Affordable Housing Restricts Housing Choice</p>		
<p>Develop a new long-term strategy that would serve as an ongoing affordable housing vision and that would set measurable short and long-term goals for housing production, preservation, and continued affordability.</p>	<p>A formal housing plan was developed in 2017. Progress toward meeting the goals of the plan are reported out during the Affordable Housing Advisory Committee (AHAC) meetings.</p>	
<p>Create a Housing Task Force with participation from the County, municipalities, private developers and lenders, nonprofit advocacy groups, Legal Aid, fair housing organizations, and community representatives throughout the County.</p>	<p>The AHAC was established in 2017 and has a representative from the special needs community in addition to other non-profit and private sector representatives to provide input on how to address housing needs.</p>	
<p>Encourage private developers to construct affordable housing</p>	<p>The County has provided HOME funds to subsidize the Bembridge and Golden Gate Golf Course Development, and other affordable housing projects.</p> <p>The affordable housing requirements secured by a mortgage and in a deed.</p> <p>The affordable housing strategy is updated annually to account for unit production and migration.</p> <p>The county increased Density Bonus Program for Affordable Housing.</p>	

Recommendation	Activities	Comments
<p>Determine locations for the development of affordable housing and work with local non-profits to acquire land for affordable units.</p>	<p>Surplus county land was used to develop housing with non-profit developers.</p> <p>Collier County re-established Housing Trust Fund and established the Community Land Trust (CLT) in 2019. The CLT appointed the Board and secured funding for two projects.</p>	
<p>To improve low/moderate income households' ability to obtain mortgages, identify resources for financial counseling and training for residents to learn financial responsibility including how to have good credit, finding financial resources, and making good financial choices. Continue to implement first time homeownership programs to assist families with homeownership opportunities.</p>	<p>Collier County provided down payment assistance programs and education during the previous plan period</p> <p>Collier County also uses state SHIP program funds for down payment assistance.</p>	
<p>Implement an inclusionary zoning policy aiding in the development of affordable housing.</p>	<p>Zoning code revisions included inclusionary density incentives for affordable housing.</p>	<p>Florida state law requires local governments to "fully offset all costs" associated with inclusionary zoning, thus many communities chose inclusionary incentives versus mandates.</p>
<p>Continue the use of entitlement funding for housing rehabilitation activities to maintain the regions affordable housing stock.</p>	<p>Collier County provided HOME funds to subsidize the Bembridge and Golden Gate Golf Course Developments which are underway, along with other affordable housing projects.</p>	

Recommendation	Activities	Comments
<p>Work with housing organizations to continue efforts and collaborations on affordable housing and other fair housing needs.</p>	<p>Collier County annually funded projects and organizations to support affordable housing goals.</p>	<p>Services to address fair housing needs are limited.</p>

Impediment 3: High Concentrations of Low-Income Housing

<p>Dedicate HUD funding to concentrated low-income areas and RCAP/ECAP areas, such as Immokalee and Bayshore, to provide infrastructure improvements, home buyer education programming, and down payment assistance in an effort to attract professionals to these areas and increase homeownership.</p>	<p>Collier County annually funded infrastructure and housing rehab projects in Immokalee for rental and single-family units.</p>	
<p>Focus future development of new affordable housing outside R/ECAP areas and communicate this strategy to developers and non-profit partners/prioritize funding to projects achieving this goal.</p>	<p>Collier County provided HOME funds to subsidize the Bembridge and Golden Gate Golf Course Developments which are underway, along with other affordable housing projects. Most developments were outside or R/ECAP areas.</p>	
<p>Encourage the de-concentration of poverty by expanding areas where housing vouchers may be used/educate and provide incentives to landlords.</p>		<p>No documentation that this was completed.</p>

Recommendation	Activities	Comments
<p>Develop an evaluation tool to monitor planning and public investments by local and regional entities and advocate for opportunities to provide public infrastructure that promotes housing choice in areas of opportunity.</p>	<p>The County monitors affordable housing production and continually updates its affordable housing strategy.</p>	
<p>Impediment 4: Lack of Accessible/Special Needs Housing</p>		
<p>Engage organizations representing persons with disabilities in housing strategy development discussions</p>	<p>The AHAC was formed in 2017 and includes representation from special needs community.</p>	
<p>Review taxation codes and implement tax exemptions for making adaptations to make a home more accessible for persons with disabilities</p>	<p>Inclusionary zoning policy and Land Trust created in 2019. The impact fee deferral program did not change. However, zoning was improved, and affordable housing is tracked and reported on during the AHAC meetings.</p>	
<p>Implement codes regulating that all new construction of multi-family (4 units or more), co-ops, and conversions must meet Section 504 of the American Disabilities Act (ADA).</p>	<p>There are density bonuses for low-income seniors. All other regulations are based on State requirements.</p>	
<p>Conduct an assessment of accessible housing units and buildings in the region for the purpose of developing an inventory of accessible housing and providing that information to the public.</p>	<p>A list of income-restricted housing is maintained, but not an inventory of accessible housing. All new subsidized housing has a set aside requirement.</p>	

Recommendation	Activities	Comments
<p>Work with local housing organizations to provide a wide variety of housing services, including services to the disabled.</p>	<p>The County funded a number of projects to address special populations and ensure affordable housing (see previous comments).</p>	
<p>Meet with design specialists to require and encourage housing designs that consider the needs of the disabled and other special needs populations through the AHAC.</p>	<p>Design professionals are members of the AHAC.</p>	
<p>Provide builders and developers with information about the advantages of providing housing for this market.</p>	<p>Collier County improved its website to include a list of resources for developers to encourage affordable housing.</p>	

Section 5: 2021-2025 Fair Housing Action Plan

Impediment	Recommendation	Responsible Party
<i>Impediment 1: Disparity in housing needs and affordable housing throughout Collier County</i>		
1.1 Lack of affordable housing	1.1.1 Implement recommendations of the comprehensive housing strategy for more equitable distribution of Low-Income Housing Tax Credit (LIHTC) developments, public housing and multi-family assisted developments throughout the county.	Collier County
	1.1.2 Develop an affirmative marketing program for housing opportunities that provide outreach to income- and mortgage-eligible households seeking homeownership, with a focus on the segments of the population that may be less likely to apply for affordable housing. Require that all developers involved with affordable housing funds provide an affirmative fair housing marketing plan.	Collier County
	1.1.3 Monitor and retain existing subsidized housing by proactively engaging with building owners to encourage the preservation of existing affordable housing before the compliance period or Section 8 contracts expire.	Collier County
	1.14 Provide full impact fee exemptions for “critical need” affordable housing developments. Critical Need Developments may include those supporting low-income service workers, low-income large families, or extremely low-income residents. “Critical Need” criteria should be reviewed periodically to ensure they targeted appropriately based on community need.	Collier County

Impediment	Recommendation	Responsible Party
1.2 Lack of diverse housing options for family size	1.2.1 Encourage the development of multi-family housing with more bedroom options to serve large families in Collier County.	Collier County
	1.2.2 Seek opportunities to provide maintenance programs for renter households with a focus on Immokalee.	Collier County
	1.2.3 Encourage and support affordable housing projects that meet the average family size in Collier County.	Collier County
1.3 Increased need for accessing housing for the aging population with disabilities and senior women	1.3.1 Incorporate visitability standards into projects assisted with local funds.	Collier County
	1.3.2 Provide funding to support financing affordable senior housing projects.	Collier County
	1.3.3 Continue to provide downpayment assistance and explore flood insurance support for low- to moderate-income homeowners to reduce the cost of purchasing and owning a home.	Collier County
Impediment 2: Unequal access to opportunity		
2.1 Income inequality between men and women and racial and ethnic minority and Whites.	2.1.1 Provide workforce and job training opportunities to raise median household income with focus on Immokalee.	Collier County

Impediment	Recommendation	Responsible Party
	2.1.2 Reduce barriers for women with children to enter the workforce by supporting agencies to expand low-cost, high quality childcare or pre-school programs.	Collier County and Childcare Providers
	2.1.3 Develop training programs and education opportunities in Immokalee or enhance transit routes to allow better access to programs throughout the County.	Collier County, CAT
	2.1.4 Support agencies that provide housing assistance for undocumented residents.	Collier County
2.3 Lack of access to quality education in Immokalee	2.3.1 Provide down-payment assistance to low- and moderate-income first-time home buyers, and other incentives that will encourage teachers to move to Immokalee and make housing affordable for Collier County essential workers (public safety, education, health care and service industry).	Collier County
	2.3.2 Continue to expand public transit routes and reduce headway times.	Collier Area Transit
	2.3.3 Encourage and promote transit-oriented development with higher density multifamily housing and mixed-use housing, serving a variety of incomes, abilities, and household sizes.	Collier Area Transit
2.4 High percentage of individuals with Limited English Proficiency	2.4.1 Ensure all Fair Housing documents are translated into the dominant non-English spoken languages.	Collier County

Impediment	Recommendation	Responsible Party
	2.4.2 Provide housing counseling services to individuals who are not native English speakers	Collier County
2.5 Limited access to affordable healthcare	2.5.1 Support agency outreach efforts to uninsured low- and moderate-income families during open enrollment periods to reduce the number of uninsured residents.	Collier County
Impediment 3: Segregated living patterns R/ECAP concentrated areas of poverty		
3.1 Need to expand access to areas of opportunity to diverse groups.	3.1.1 Develop an affirmative marketing and outreach program to low- and moderate-income, mortgage-eligible households seeking homeownership opportunities. Require that all rental housing developers involved with affordable housing funds provide an affirmative fair housing marketing plan.	Collier County
	3.1.2 Continue to provide down-payment assistance to low- and moderate-income first-time home buyers. Continue to support partnerships with businesses that provide down-payment to their employees. Develop housing incentives that will encourage diversity in various communities.	Collier County
	3.1.3 Encourage the de-concentration of poverty by expanding Housing Choice Voucher acceptance and utilization through landlord education and support.	Collier County
3.2 Need for financing affordable housing and infrastructure projects that support affordable housing.	3.2.1 Continue to financially support affordable housing projects, prioritizing assistance to projects in areas with higher home, land, and construction costs.	Collier County

Impediment	Recommendation	Responsible Party
	3.2.2 Target infrastructure investment to R/ECAP areas to encourage business development.	Collier County
	3.2.3 Monitor planning and public investments by local and regional entities and seek opportunities to provide public infrastructure and resources that promote housing choice.	Collier County
3.3 Infrequent and limited public transit routes	3.3.1 Improve transportation linkages between R/ECAP areas and job centers to lower barriers to work.	Collier County, CAT
Impediment 4: Limited Enforcement of Civil rights and lack of resources to ensure fair housing compliance		
4.1 Need to enhance fair housing enforcement	4.1.1 Review local fair housing legislation and update as necessary to align with federal FHA	Collier County
	4.1.2 Conduct targeted testing for discrimination related to disability, race/ethnicity, and source of income.	Collier County
	4.1.3 Contract with a HUD-approved Fair Housing organization to deliver fair housing education activities for county residents.	Collier County
4.2 Need to increase fair housing training and access to information to residents, staff, and partners	4.2.1 Continue mandatory fair housing training for county staff, subrecipients, and any other entities the county may contract with under its entitlement program.	Collier County

Impediment	Recommendation	Responsible Party
	4.2.2 Support fair housing training for landlords, property managers, real estate professionals and mortgage lenders by a HUD-approved Fair Housing organization and make the training mandatory for rental properties with housing code violations.	Collier County
	4.2.3 Continue to develop fair housing marketing materials to be distributed at government offices and other public venues.	Collier County
	4.2.4 Continue to publish contact information and referral information related to fair housing in local newspapers. Periodically provide fair housing education programs in low- and moderate-income neighborhoods or communities such as publicly assisted housing or large apartment developments.	Collier County

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