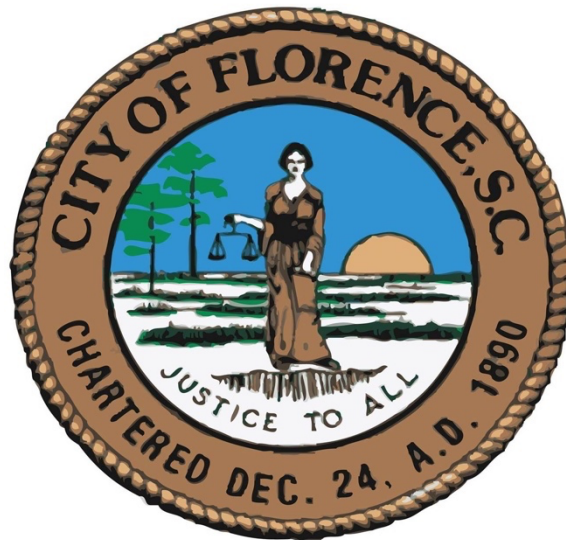


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# CITY OF FLORENCE 2021 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

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2021 Analysis of Impediments to Fair Housing Choice



THE CITY OF FLORENCE  
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## Executive Summary

### Introduction

The City of Florence, South Carolina has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. The City of Florence has participated in the federal Housing and Urban Development (HUD) CDBG program as an Entitlement City since the 1970s. The Department of Community Services oversees this program and is charged with the responsibility of conducting its CDBG program in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities which receive federal funds through the City of Florence.

Entitlement communities receiving CDBG entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin;
- Promote housing that is accessible to and usable by persons with disabilities; and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice. The following Analysis of Impediments to Fair Housing Choice serves as a comprehensive look at fair housing issues in the City of Florence. The report includes an analysis of various demographic, economic, and housing indicators; a review of public and private sector policies that affect fair housing; and a review of the city's efforts to create fair housing choice. It is to be used as a resource document the city can reference for insights into community needs and strategies that can help address those needs.

Fair housing choice means that residents have the necessary information, opportunity, and options to live where they choose without unlawful discrimination (24 CFR 5.152) and is composed of three components:

- Protected choice, meaning the absence of unlawful discrimination.
- Actual choice, meaning not only that affordable housing options exist, but that the information and resources are available to enable informed choices.
- Quality choice, meaning that the available and affordable housing is decent, safe, and sanitary, and, for persons with disabilities accessible as required under civil rights law.

It is important to note that this report is being drafted during the coronavirus pandemic. Most of the content of this report was generated based on data collected prior to the pandemic and analysis conducted during this major health crisis. The implications of the crisis are and will be profound, affecting communities and households along all social and economic dimensions. However, whatever those dynamic shifts may be, the content of this report remains relevant, offering insight into baseline conditions that the current crisis will likely magnify.

## Summary of Findings:

The conclusion of this analysis has identified several current impediments to fair housing choice, some of which are related to those identified in the previous Analysis of Impediments. For each impediment, recommendations have been identified that can help to alleviate these impediments moving the City of Florence forward. Key findings identified in this analysis to fair housing choice are:

1. An Older and Aging Housing Stock
2. Zoning and Land Use Policies that Constrain Housing Diversity
3. A Disconnect Between Fair Housing Complaints and Perceived Housing Discrimination.
4. A High Percentage of Renters Who are Cost Burdened
5. Declining Household Purchasing Power
6. A Growing Poverty Rate
7. Significant Income Inequality Between Race and Ethnicity
8. Increasing Housing Instability: Higher Rates of Renter Evictions and Risk of Homelessness.

## Actions to Address Impediments:

In an effort to overcome or ameliorate barriers to fair housing choice, the City of Florence listed corresponding strategic actions for consideration and implementation. The actions listed will be addressed over the next five years, aligning the accomplishments of these actions with the consolidated planning cycle. Although not all of the impediments will likely be eliminated in a short time period, such as five years, the city will strive to affirmatively further fair housing and reduce these barriers to promote fair housing choice. Further details are found in the Fair Housing Action Plan section.

## Lead Agency

The City of Florence Department of Community Services was responsible for the preparation and implementation of the AI. Staff from department identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified. Civitas, LLC, a private affordable housing research firm from Charleston, SC assisted with data collection and analysis.

## Purpose of Fair Housing

Fair housing has long been an important issue in American urban policy, a problem borne in discrimination and fueled by growing civil unrest that reached a boiling point during the Civil Rights Movement of the 1960s. The passing of the Fair Housing Act in 1968 was a critical step in addressing this complex problem, but it was far from a solution. Since the passing of the Act, many community groups, private businesses, concerned citizens, and government agencies have worked at battling housing discrimination in the face of persistent practices to the contrary.

By design, federal housing policy racially segregated housing for decades. Those policies, as well as the many local and state discrimination policies, are no longer legal, but many communities still feel the effect of red-lining and other policies meant to segregate racial groups which led to decades of divestment and negative economic outcomes. Unfortunately, while the laws have changed, the impact of these historic practices and their link between a person's race or ethnicity and access to housing and economic opportunities endures. Many areas of the country have been classified as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). Proactively addressing the connection between race, housing, and poverty is a necessary part of any housing program.

The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) "affirmatively furthers fair housing" through its programs. Toward this end, HUD requires funding recipients undertake fair housing planning (FHP) and steps that lead to less discriminatory housing practices and better living conditions for minority groups and vulnerable populations.

This 2021 Analysis of Impediments to Fair Housing Choice is an in-depth examination of potential barriers, challenges, and opportunities for housing choice for the City of Florence's residents. Impediments to fair housing are defined as any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice. Fair housing choice is the ability of persons of similar income levels—regardless of race, color, religion, national origin, disability, gender, or familial status—to have the same housing choices.

The Analysis of Impediments is an integral component of the fair housing planning process and consists of a review of both public and private barriers to housing choice. It involves a comprehensive inventory and assessment of the conditions, practices, laws, and policies that impact housing choice within a jurisdiction. It provides documentation of existing, perceived and potential fair housing concerns, and specific action strategies designed to mitigate or eliminate obstacles to housing choice for the residents. The Analysis is intended to serve as a strategic planning and policy development resource for local decision

makers, staff, service providers, private sector, and community leaders in the city. As such, this Analysis of Impediments will ultimately serve as the foundation for fair housing planning in the City of Florence.

The long-term objective of this Analysis of Impediments to Fair Housing Choice is to make fair housing choice a reality for residents of the City of Florence through the prevention of discriminatory housing practices. One goal of the study is to analyze the fair housing situation in the city and assess the degree to which fair housing choice is available for area residents. A second goal is to suggest ways to improve the level of choice through continued elimination of discriminatory practices, if any are found to exist. The sections that follow provide a succinct overview of the legal and conceptual aspects of fair housing planning and policy.

## Fair Housing Concepts

Housing choice plays a critical role in influencing individuals' and families' abilities to realize and attain personal, educational, employment, and income potential. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through sound planning. Through its on-going focus on Fair Housing Planning (FHP), HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing." Among the recurring key concepts inherent in FHP are:

- *Affirmatively Further Fair Housing (AFFH)*: Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.
- *Affordable Housing*: Decent, safe, quality housing that costs no more than 30% of a household's gross monthly income for utility and rent or mortgage payments.
- *Fair Housing Choice*: The ability of persons, regardless of race, color, religion, national origin, disability, gender or familial status, of similar income levels to have the same housing choices.
- *Fair Housing Planning (FHP)*: Fair Housing Planning consists of three components, including The *Analysis of Impediments*; a detailed *Action Plan* to address identified impediments; and a monitoring process to assess progress in meeting community objectives. FHP consists of a close examination of factors that can potentially restrict or inhibit housing choice and serves as a catalyst for actions to mitigate identified problem areas.
- *Impediments to Fair Housing*: Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.
- *Low and Moderate Income*: Defined as 80% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. *Very low income* is defined as 50% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. Poverty level income is defined as 30% or below median household income.
- *Private Sector*: Private sector involvement in the housing market includes banking and lending institutions, insurance providers, real estate and property management agencies, property owners, and developers.
- *Public Sector*: The public sector for the purpose of this analysis includes local and state governments, regional agencies, public housing authorities, public transportation, community development organizations, workforce training providers, and community and social services.

## Methodology

The analysis consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within the City of Florence. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the city, with a particular focus on those that affect housing and special needs populations.
- Public and private organizations that impact housing issues in the city and their practices, policies, regulations, and insights relative to fair housing choice.
- The range of impediments to fair housing choice that exists within both the urban center and other areas of the city.
- Specific recommendations and activities for the jurisdictions to address any real or perceived impediments that exist.
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice in the city.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. These documents included local comprehensive plans and ordinances; the 5-Year Consolidated Plan for the City of Florence; the previous Analysis of Impediments to Fair Housing Choice, among other policy documents.

## Demographics and Trends

Utilizing quantitative data sources such as U.S. Census Bureau reports, American Community Survey data (ACS), the U.S. Bureau of Labor Statistics (BLS), PolicyMap, Federal Financial Institutions Examination Council (FFIEC), and local plans and reports, demographic and housing data was collected for the City of Florence to determine any patterns or trends that may indicate a concentration of protected classes in any one area of the city. Data collected and analyzed also included employment, income, and other relevant data. Information on the availability of housing, including various housing types and sizes, affordability levels, and accessibility for disabled persons, was also reviewed.

## Data Collection

Data collection included an analysis of fair housing choice and any limitations due to existing conditions within the city or surrounding localities. A comprehensive review and assessment of current land use policies, local laws, ordinances, and practices that may affect fair housing choice within the City of Florence was conducted.

ACS 2015-2019 five-year estimates were the most recent datasets at the time of research that incorporated all the issues for cross sectional analyses. It should be noted that the comparison of 2019 data to 2000 and/or 2010 Census data is the best means for understanding trends that offer statistically



significant forecasts on the demographic, economic, and housing trends for the next five to ten years. When available, more recent data is used to offer a static point of information, but should not be used to dismiss the wider trend analysis on which this report focuses. Data regarding fair housing lending policies and practices was analyzed using the Home Mortgage Disclosure Act (HMDA) and Private Mortgage Insurance Companies (PMIC).

## Section I – Community Profile

The goal of the Community Profile is to provide evidence and analysis to be used by grant recipients seeking to address impediments to fair housing choice. This data is an important tool that will help guide decision makers in deciding where funds would have the greatest impact. The Community Profile is broken into three sections.

The first section is the Demographic Profile, which looks at the city from the perspective of its people. Race and ethnicity, age, disability status, and other variables are explored. This section provides the necessary foundation to determining who lives in the jurisdiction and what their needs are. This outlines the demand for housing by looking at what household's desire.

The second section, the Economic Profile, looks at the job market and the financial situation of the residents and evaluates how much households can afford. Factors like income, cost burden, and poverty are analyzed. These issues are compared to the factors in the demographic analysis to determine if disparities exist between racial and ethnic groups. This evaluates the demand for housing by looking at what a household can afford.

The third section is the Housing Profile and it looks at the city's housing stock. Multiple angles are explored, including home values, rents, occupancy, and age of housing to provide a snapshot of the physical environment of the region. This section establishes the supply of the available housing and how that matches up with the demand. Together, these pieces provide a data-driven view of the jurisdiction that will advance fair housing planning efforts and identify any impediments to fair housing choice.



Location of Florence in South Carolina

# Demographic Profile

## Introduction

The Demographic Profile looks at the city from the perspective of its people. Understanding who lives throughout the jurisdiction, where they live, and how that has changed provides a starting point for identifying impediments. This process requires exploring several demographic variables such as race and ethnicity, age, disability status, and others. This information will allow the city to answer one of the most important questions when addressing fair housing issues--who needs assistance. People are at the foundation of the decision-making process, and understanding what the demographics are and how they have changed is necessary before policy changes can be proposed.

## Population

Understanding how the population has changed over time is one of the most important demographic data points available. This change gives a broad view of whether the area is a place experiencing growth. A growing population usually represents a place that is attractive to new households while a shrinking or stable population may mean resident’s needs are not being met.

Population growth is generally a positive indicator but with it comes challenges, particularly for the housing market. When a population grows more quickly than the housing stock the overall demand increases which puts upward pressure on housing prices. Increased prices make it more difficult to locate affordable, safe, and secure housing, particularly for lower income households.

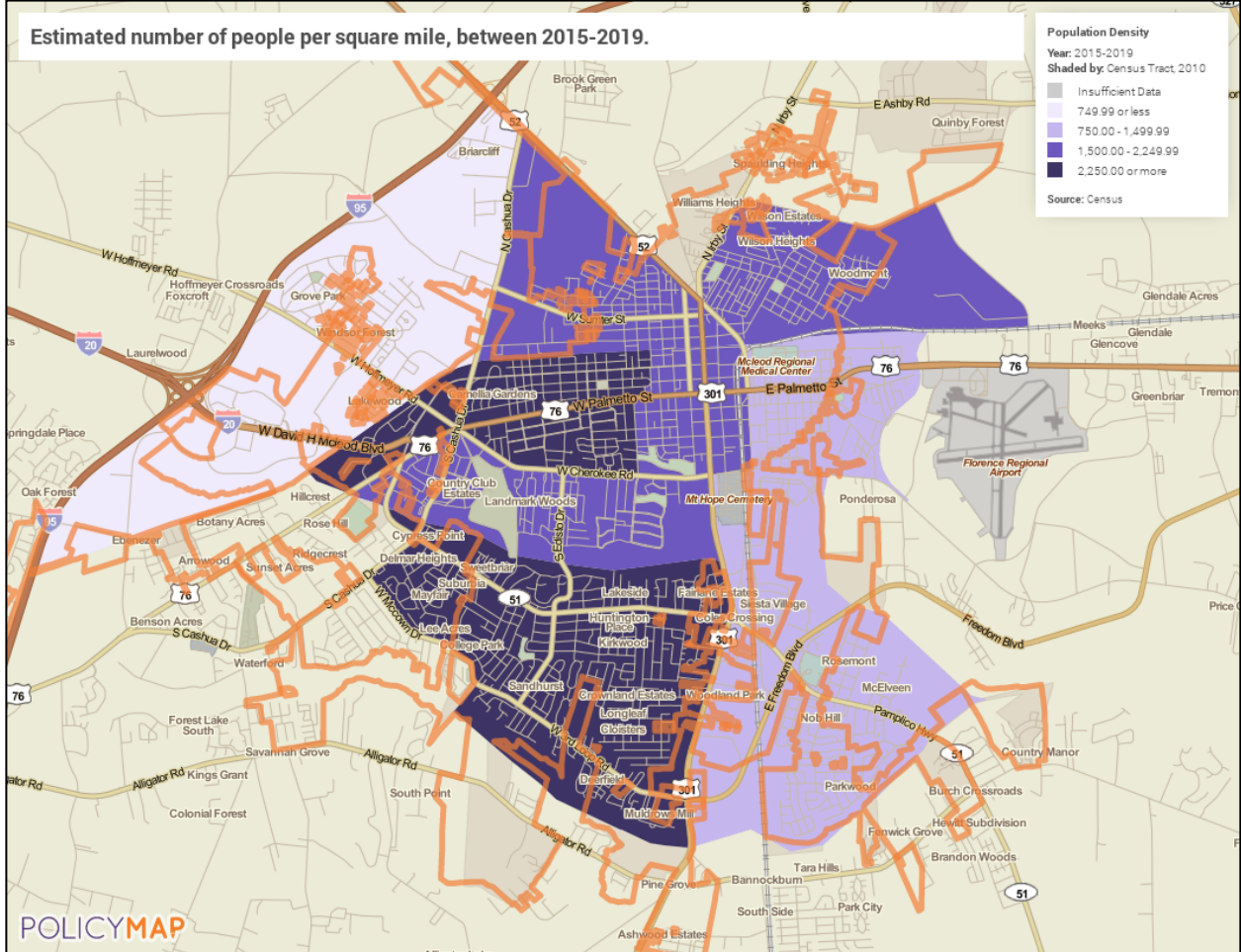
The City of Florence has grown slightly faster than the state as a whole. The city grew by over 8,200 residents, or 27.2%; the state grew by approximately 1,000,000, or 25.1%.

Table: Population – 2000 to 2019

	2000	2019	2000 - 2019	
			% Change	Difference
Florence	30,248	38,487	27.2%	8,239
South Carolina	4,012,012	5,020,806	25.1%	1,008,794
Source: 2000 Census, 2015-2019 ACS 5-Yr Estimates (DP05)				

The City of Florence has two areas that are more densely populated than elsewhere in the city. In these areas there are 2,250 or more people per square mile. Tracts towards the edges of the city are significantly less dense with fewer than 750 per square mile in the west and between 750 and 1,500 people per square mile in the east.

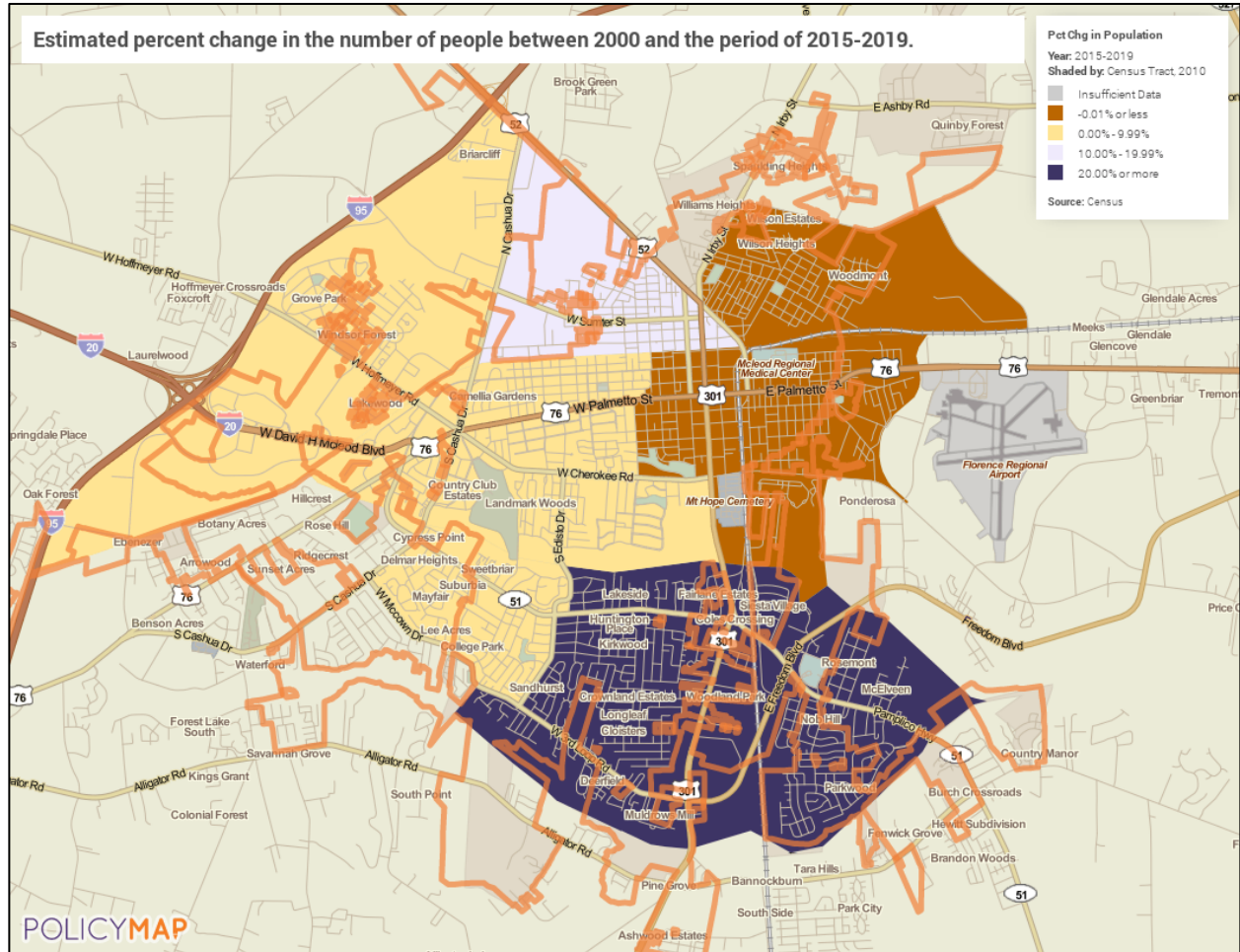
Map: Population Density



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

Since 2000, the city has seen both population growth and a shift in where people are living. Tracts in the east had a population decrease while tracts elsewhere increased. The largest increase was in the southern tracts that grew by over 20%.

Map: Change in Population



## Age Groups

The age distribution of a city is vitally important to the housing market and a jurisdiction's economy. The needs of residents can vary significantly depending on what stage of life they are in. Residents who are nearing retirement or currently retired are often looking to downsize into smaller homes and may prioritize accessibility and transportation options. Young adults, particularly new families, have different housing demands and tend to look for homes they can grow into and possibly raise children. Understanding how the age of the population is changing is important to determine which types of housing units are in need and it will also help set realistic goals for what funds will be available.

The median age in Florence is currently 39.7 years, which is 3 years older than it was in 2010. Currently, 31.5% of the city's population is under the age of 25, a decrease from 2010 (34.3%). The percent of the population that is working age (25 to 64 years old) also decreased, from 52% to 49.6%. The largest change was with the 65 and older population which increased by 1,369 and now makes up nearly 17% of the population. The population between the age of 65 and 74 showed the fastest growth, growing by approximately 1,790 people, or from 7.2% of the population to 11.4%.

*Table: Age – 2010 to 2019*

Age Cohort	2010		2019	
	Number	Percent	Number	Percent
Under 5 years	2,619	7.3%	2630	6.8%
5 to 9 years	2,337	6.5%	2326	6.0%
10 to 14 years	2,192	6.1%	2875	7.5%
15 to 19 years	2,446	6.8%	2396	6.2%
20 to 24 years	2,747	7.6%	1930	5.0%
25 to 34 years	4,968	13.8%	5344	13.9%
35 to 44 years	4,652	12.9%	4341	11.3%
45 to 54 years	4,740	13.2%	4759	12.4%
55 to 59 years	2,470	6.9%	2228	5.8%
60 to 64 years	1,860	5.2%	2399	6.2%
65 to 74 years	2,604	7.2%	4393	11.4%
75 to 84 years	1,660	4.6%	1939	5.0%
85 years and over	722	2.0%	927	2.4%
Median Age	36.7	--	39.7	--

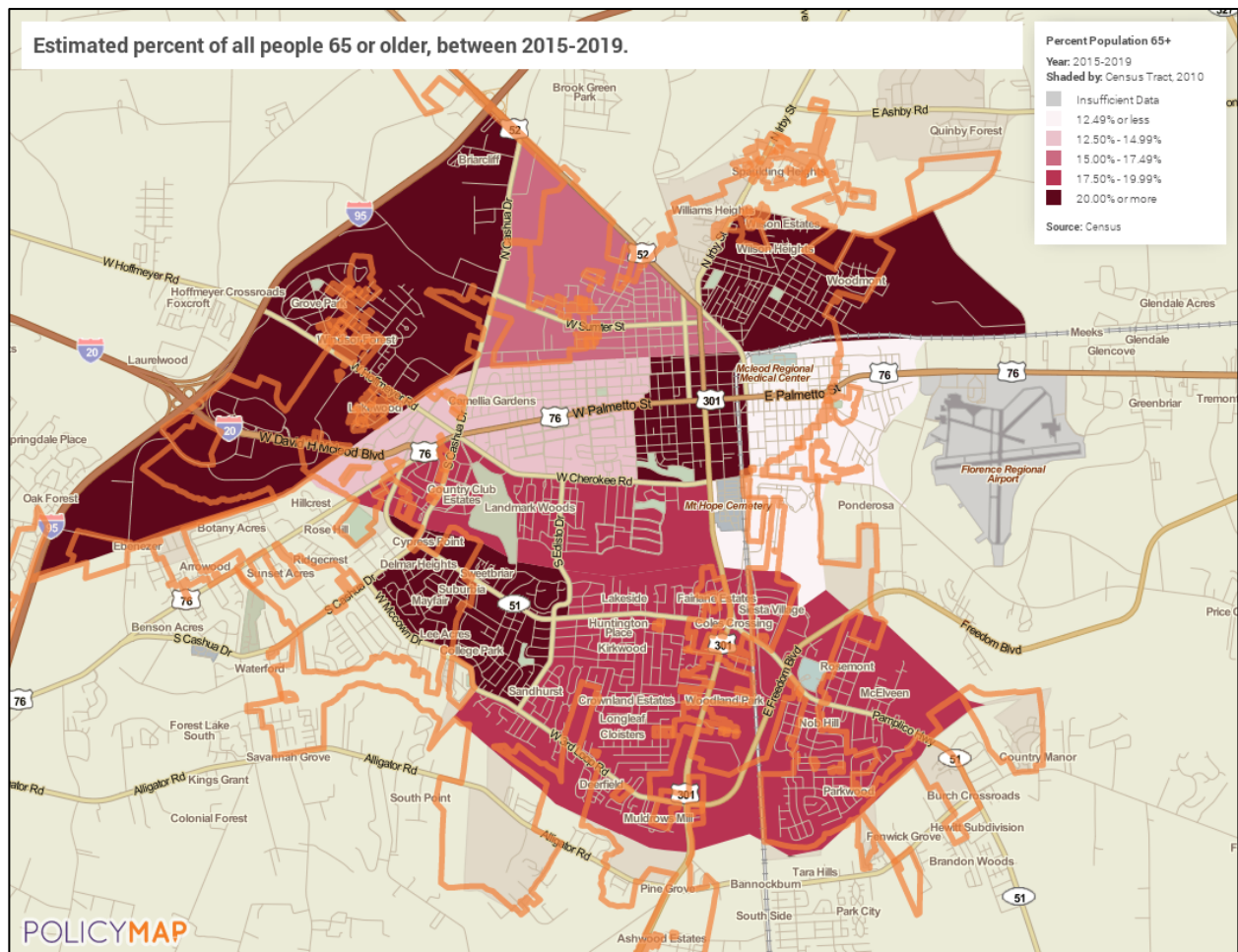
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP05)

## Retired Population

Like many communities throughout the country, the City of Florence has a growing retirement age population. As people age, they tend to require new types of social services, healthcare, and housing. Central to these evolving needs is access to housing options that are decent, safe, affordable, accessible, and located in proximity to services and transportation. Housing is one of the most essential needs of the elderly because the affordability, location, and accessibility of where they live will directly impact their ability to access health and social services, both in terms of financial cost and physical practicality.

Tracts with a relatively high retirement age population are found throughout the city. In several tracts over 20% of the population is in in this age group. There is only one area, the eastern portion of the city near the airport, where less than 12.5% of the population is 65 years old or over.

Map: Population 65 Years Old and Older



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

The population groups begin at 12.5% in the above map to increase clarity.

## Age Dependency Ratio

Age dependency ratios relate the number of working-aged persons to the number of dependent-aged persons (children and the elderly). An area's dependency ratio is comprised of two smaller ratios – the child dependency ratio and the old-age dependency ratio. These indicators provide insight into the social and economic impacts of shifts in the age structure of a population. Higher ratios of children and the elderly require higher levels of services to meet the specific needs of those populations. Furthermore, a higher degree of burden is placed on an economy when those who mainly consume goods and services become disproportionate to those who produce. It is important to note that these measures are not entirely precise; not everyone under the age of 18 or over 65 is economically dependent, and not all working age individuals are economically productive. With these caveats in mind, dependency ratios are still helpful indicators in gauging the directional impacts of shifting age structures. The age dependency ratio is higher in Florence than it is statewide for both old-age and child dependency.

*Table: Age Dependency Ratios*

	<b>South Carolina</b>	<b>Florence</b>
Age dependency ratio	64.4	76.3
Old-age dependency ratio	28.3	33.2
Child dependency ratio	36.1	43.0
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (S0101)		



Race and Ethnicity

Federal housing policy intentionally racially segregated housing for decades. Those policies, as well as the many local and state discrimination policies, are no longer legal, but many communities still feel the effect of red-lining and other laws meant to segregate racial groups. An unfortunate truth is that within the United States there is a link between a person’s race or ethnicity and their access to housing and economic opportunities. Many areas of the country have been classified as a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). Proactively addressing the connection between race, housing, and poverty is a necessary part of any housing program.

Florence does not have a racial or ethnic group that is in the majority. The Black or African American and White populations nearly the same size, around 18,300 people. The city’s population is more diverse than South Carolina. Statewide, White residents make up over two-thirds of the population.

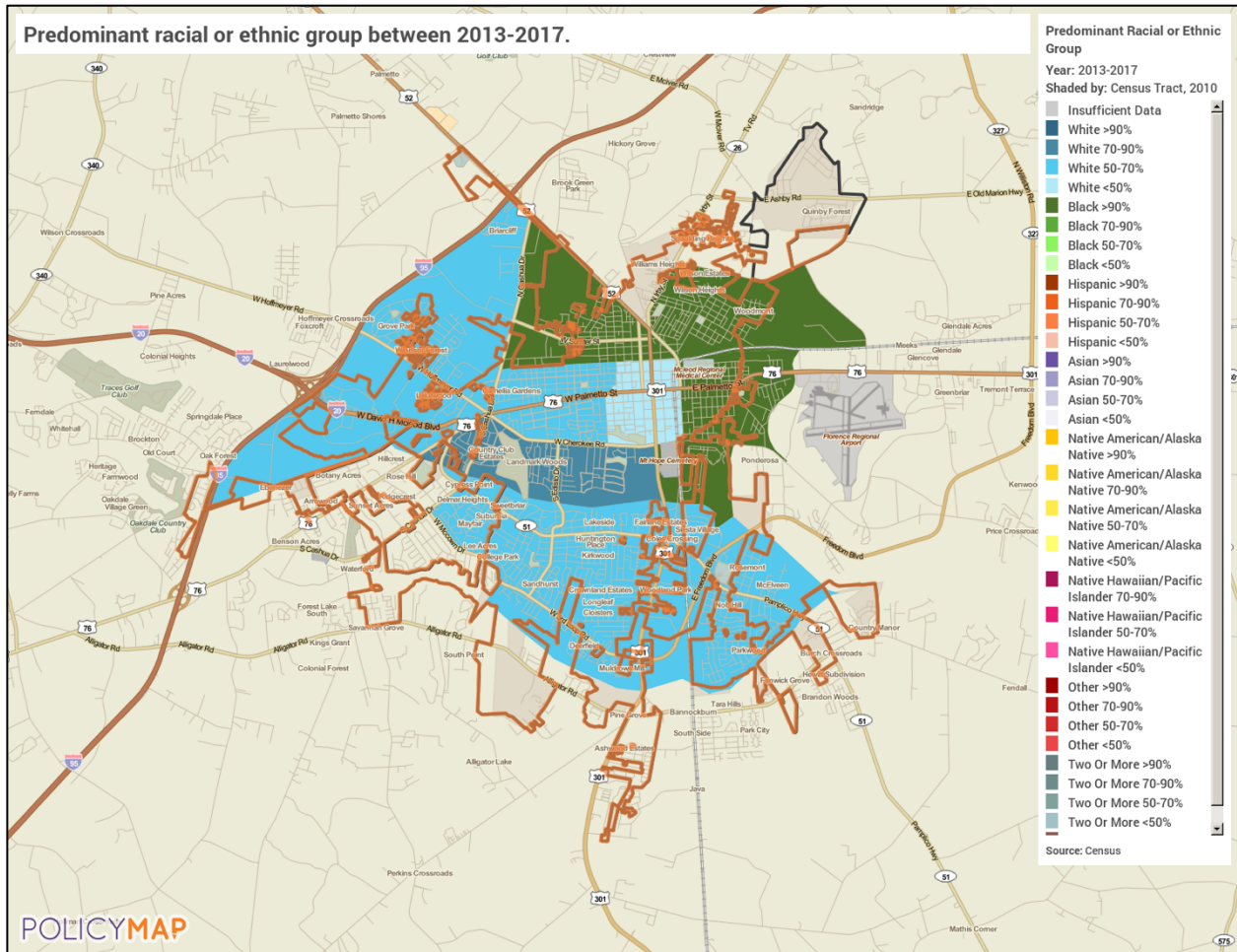
*Table: Race and Ethnicity*

	South Carolina		Florence	
	Number	Percentage	Number	Percentage
White alone	3,372,011	67.2%	18,344	47.7%
Black or African American alone	1,344,139	26.8%	18,308	47.6%
American Indian and Alaska Native alone	17,645	0.4%	174	0.5%
Asian alone	78,805	1.6%	877	2.3%
Native Hawaiian/Other Pac Islander alone	4,002	0.1%	109	0.3%
Some other race alone	88,274	1.8%	105	0.3%
Two or more races	115,930	2.3%	570	1.5%
Hispanic or Latino (of any race)	285,458	5.7%	817	2.1%
Source: 2015-2019 ACS 5-Yr Estimates (DP05)				

## Diversity

Race and geography appear to be closely tied in Florence. Despite a nearly equal population there are areas of the city that have an overwhelmingly large White or Black or African American population. The north, northeast, and eastern tracts of the city have a population that is 90% or more Black or African American, which is a significant concentration. When areas with a high poverty rate overlap with areas with a large minority population it can develop into a R/ECAP (Racially/Ethnically Concentrated Area of Poverty).

Map: Predominant Race or Ethnicity



Source: 2013-2017 ACS 5-Yr Estimates via PolicyMap

Note: The most recent years available for Predominant Race is 2013-2017.

## Displacement and Gentrification

Gentrification can have a major impact on the economic and social landscape of a city. Often, gentrification involves displacement of low-income minority communities that are pushed out of the areas their families have lived in, sometimes for generations. The economic growth and investment that comes from gentrification can be a boon, but it is important to mitigate the potential negative aspects that so often come with it.

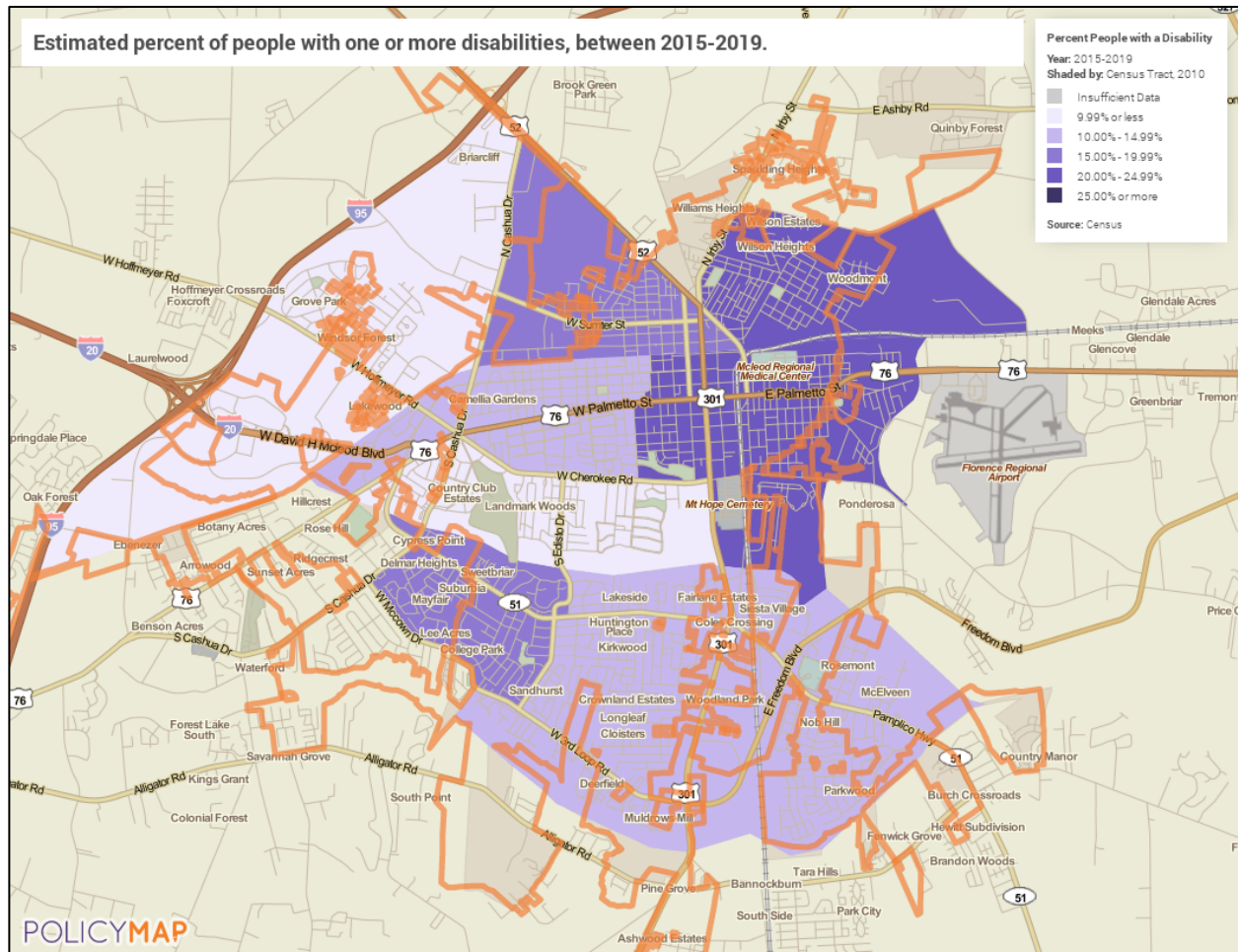
One way to measure displacement and gentrification is using a modified methodology developed by the National Community Reinvestment Coalition. In Florence, there were three tracts that were eligible for gentrification and/or displacement. However, none of the tracts experienced displacement or gentrification. Any census tract that was in 40<sup>th</sup> percentile or less of Median Home Value and Median Household Income in 2010 was eligible for analysis. An eligible tract was then considered gentrified if it was in the 60<sup>th</sup> percentile or more for Median Home Value and College Education in 2018. Next, a gentrified tract was considered to have displaced racial minorities if there was a 5% or more decline in the non-white population.

## Disability

Residents who have a disability face additional challenges, particularly when it comes to housing. Finding affordable housing is even more difficult for those who need units that have or can be modified for wheelchairs, shower supports, ramps, and other accessibility aides. Communities with a relatively large elderly population need to pay attention to this issue due to the close relationship between age and disability.

In Florence, there are areas that appear to have a disproportionate concentration of residents with disabilities. One tract on the east side of the city has a disability rate of over 25%. This is a sharp contrast to a neighboring tract where the disability rate is less than 10%. Please note that the Florence County Disability and Special Needs Campus which houses residents with disabilities and special needs is located in this east side track.

Map: Disability



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

## Veterans

Since the “War on Terror” started over 18 years ago, the number of veterans in the United States has consistently increased. With this influx of veterans there has been a mix of unique challenges and opportunities. Many communities, in cooperation with the Veterans Administration, have worked to provide educational and economic opportunities to veterans and to reduce veteran homelessness to zero. Veterans do face additional challenges though, particularly due to physical and mental disabilities obtained while serving.

As of 2019 there were approximately 2,276 veterans living in Florence making up 7.8% of the population. Veterans generally have stronger economic indicators than non-veterans. The median income of veterans is over \$10,000 higher than non-veterans, and the poverty rate is less than half. Veterans have a slightly lower labor force participation rate and unemployment rate. Unsurprisingly, veterans have a higher disability rates than non-veterans.

*Table: Comparison of Veterans and Non-Veterans*

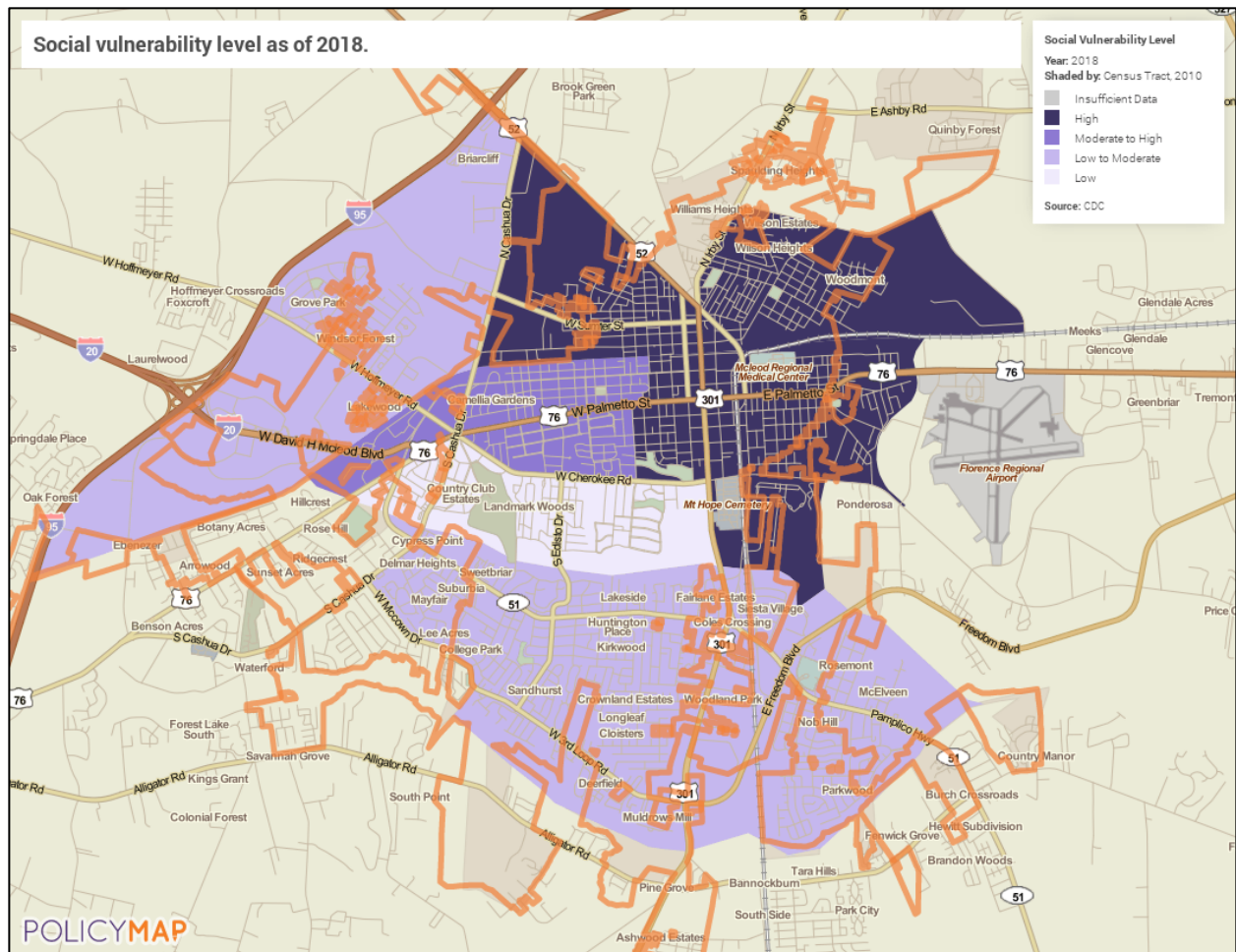
	<b>Veterans</b>	<b>Non-Veterans</b>
Population Over 18 Years Old	2,276	26,785
Median Income	\$36,326	\$25,679
Labor Force Participation Rate	74.7%	77.8%
Unemployment Rate	6.1%	4.8%
Below Poverty in the Past 12 Months	7.8%	17.3%
With Any Disability	37.5%	15.2%

Source: 2015-2019 ACS 5-Yr Estimates (S2101)

## Social Vulnerability

Within every community there are populations that are particularly vulnerable to disruption, health problems, natural disasters, climate change, and extreme weather. The Center for Disease Control developed the “social vulnerability index” to help flag areas that may need greater support and assistance in the case of disaster. It is comprised of four categories of vulnerability: socioeconomic status, household composition and disability, minority status and language, and housing and transportation. In Florence, the social vulnerability index is high in the northern part of the city. The population in this area is predominantly Black or African American and includes lower incomes and higher poverty rates.

### Social Vulnerability



Source: 2018 ACS 5-Yr Estimates via PolicyMap

Economic Profile

The market for housing and the availability of affordable housing is tied to two forces: supply and demand. In theory, the market will reach an equilibrium where supply equals demand, but in practice it is much more complicated. Demand is not a static data point, it is the culmination of the needs, wants, and resources available to members of the population. An important factor in the demand is the economic position a person is in. Their income, employment opportunities, education, and availability of transportation all play a part in the demand for affordable housing.

Income

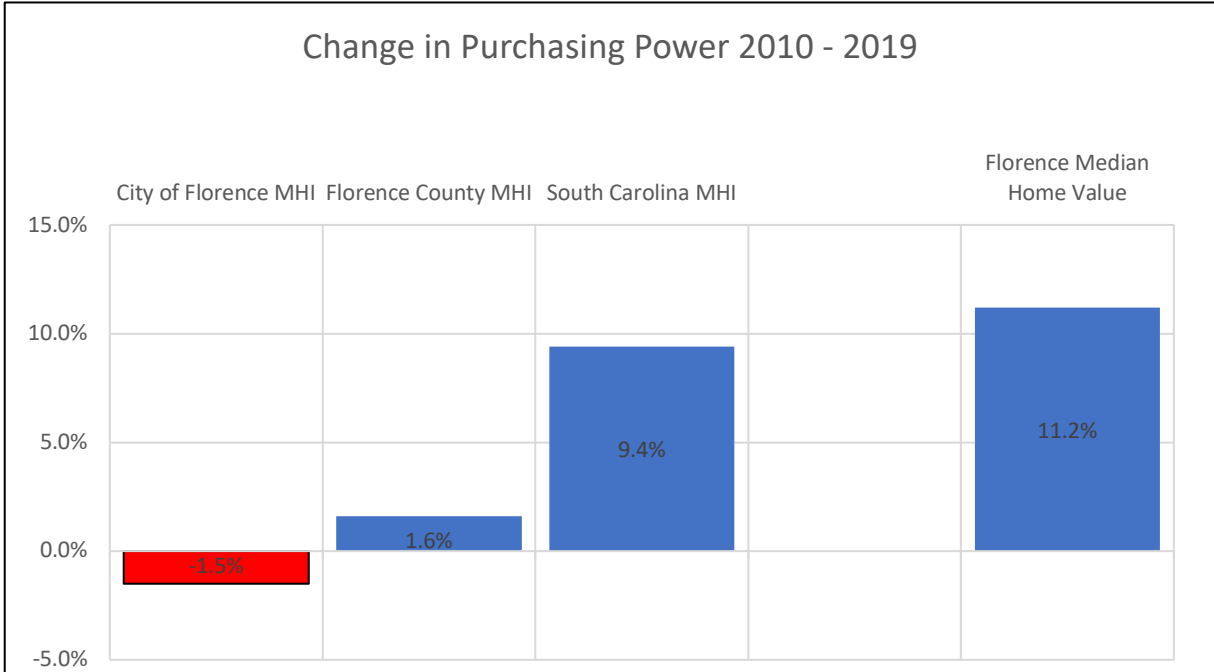
Since 2010, the purchasing power in Florence has decreased by 1.5% for a household earning the median household income (MHI). The countywide purchasing power increased by approximately 1.6%. Statewide, by comparison, the purchasing power has increased for households earning the MHI by nearly 5%. This points to slower economic growth in the region than the overall state.

*Table: Purchasing Power (Median Household Income)*

	2010	2019	Change in Purchasing Power
Florence (City)	\$50,262	\$49,525	-1.5%
Florence (County)	\$46,313	\$47,058	+1.6%
South Carolina	\$48,616	\$53,199	+9.4%

Source: 2006-2010 (adjusted for inflation), 2015-2019 ACS 5-Yr Estimates (DP03)

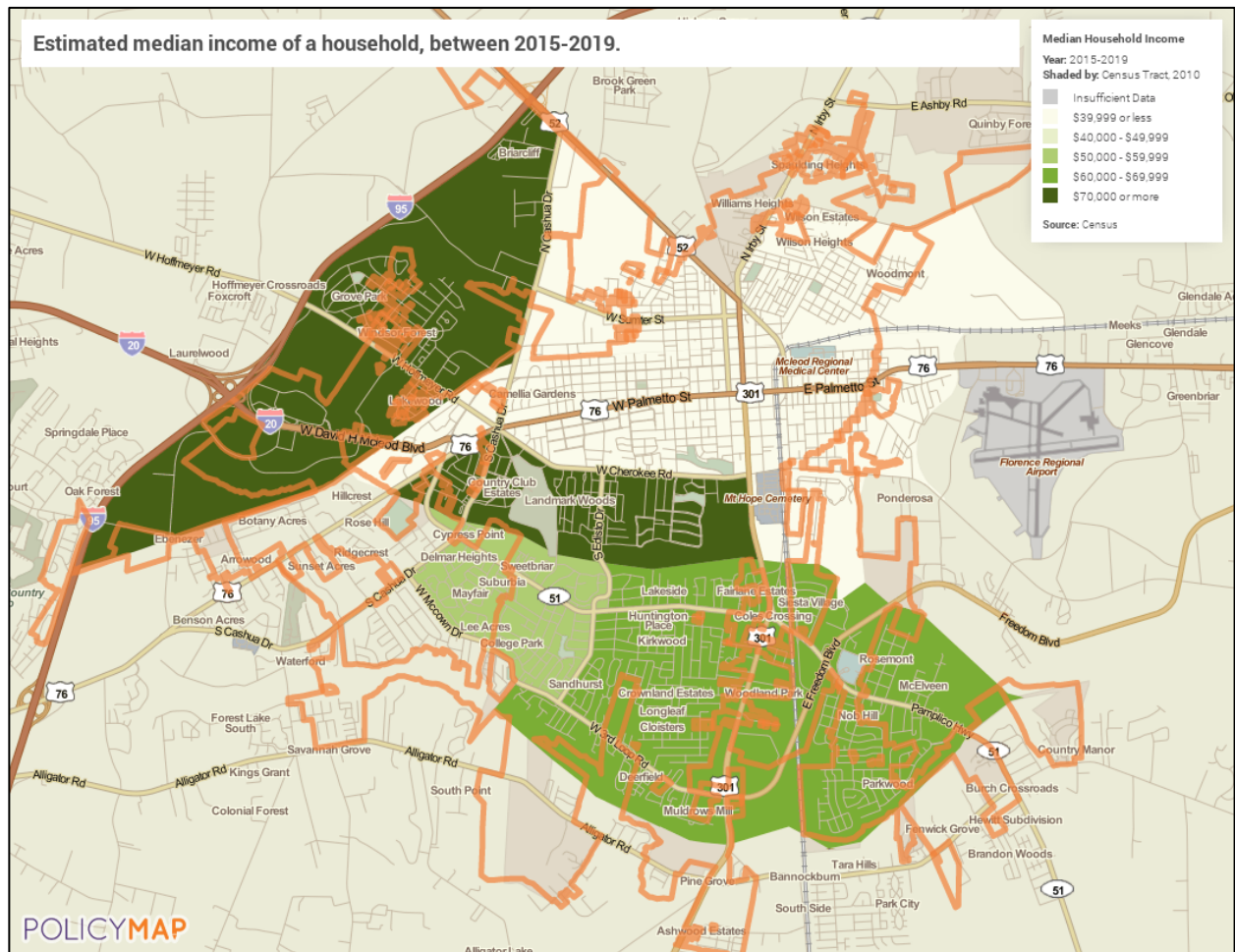
*Graph: Change in Purchasing Power*



Source: U.S. Census.

The following map displays how a household's income may be correlated with where in the city the household lives. The western and southern parts of the city have a median income greater than in the northeastern part of the city. The MHI in high income tracts is \$70,000 or more and border low-income tracts where the MHI is less than \$40,000.

Map: Median Household Income



Source: 2015-2019 ACS via PolicyMap

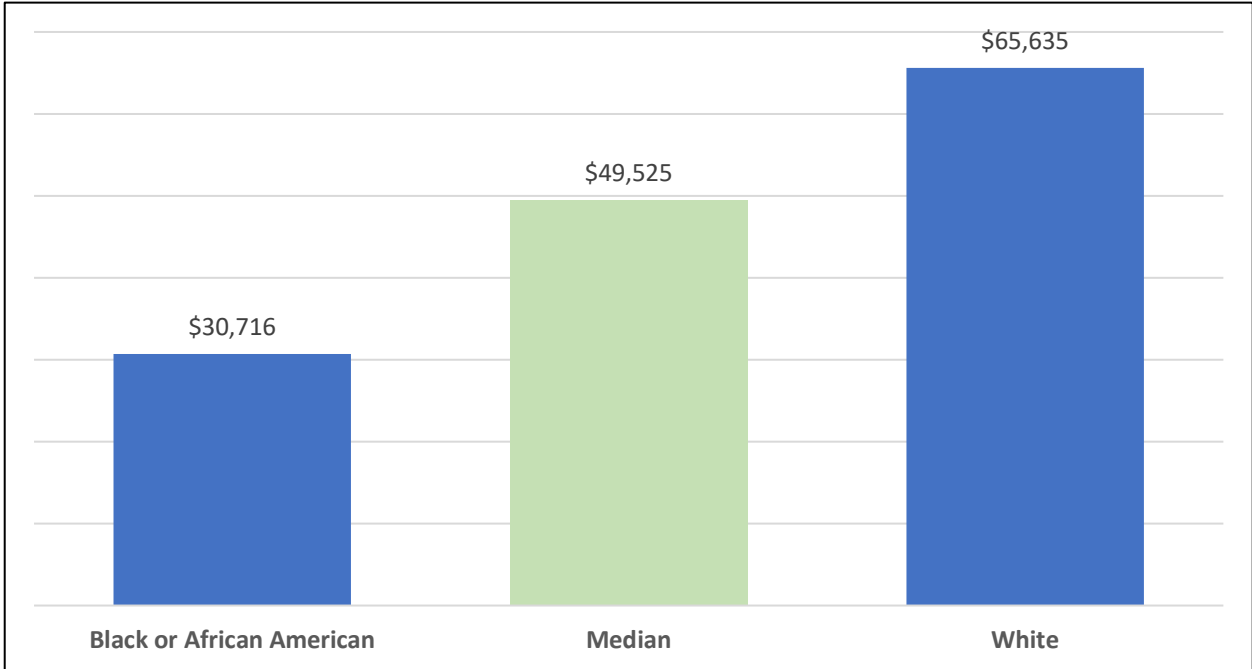
Note: Due to the relatively narrow range of MHIs in the City of Florence the group colorization starts at \$40,000 or less. This is intended to improve clarity of the income distribution in the city.



Income and Race

In addition to being linked to geography, a household’s income is also related to race or ethnicity. There is a clear difference between the median household income for Black or African American residents when compared to White residents. Black or African American households earn significantly less than any other racial or ethnic group in Florence. Understanding the relationship between race, ethnicity, and economic opportunities is important, particularly if race and ethnicity are correlated with location. When an area has a large minority population with a low MHI, it is possible that area meets HUDs definition of a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). These areas are a top priority to address within the Analysis of Impediments and may need to be a focus for grant fund use.

*Graph: Income and Race*



Data Source: 2015-2019 American Community Survey 5-Yr Estimates (S1903)  
Groups with a small sample size and large margin of error were removed from this visualization.

Cost Burden

According to HUD, households paying in excess of 30% of their monthly household income towards housing costs (renter or owner) are said to be “cost burdened.” When a household is cost burdened, they are at an increased risk of homelessness and a substandard living environment. To analyze the impact of cost burden on residents, the population is separated into three housing types: homeowners with a mortgage, homeowners without a mortgage, and renters.

Renters are, by far, the most cost burdened group in the city. Over 50% of renters are cost burdened and approximately 41% of renters pay 35% or more of their income to housing costs. Even without considering housing cost burden, renters have greater housing instability and a greater likelihood of needing assistance. A household that can purchase property within their means is able to provide a more secure housing situation and create intergenerational wealth. Assisting renters who wish to own a home is a way to help alleviate financial pressure on renters.

Homeowners have a significantly lower cost burden rate, but there are still households within the city who lack the income necessary for economic security. Approximately 11.2% of homeowners without a mortgage and approximately 23.4% of homeowners with a mortgage are cost burdened. Homeowners without a mortgage have a particularly low-cost burden rate. However, they also are more likely to be elderly and may lack disposable income, meaning any increase in housing costs can cause significant problems.

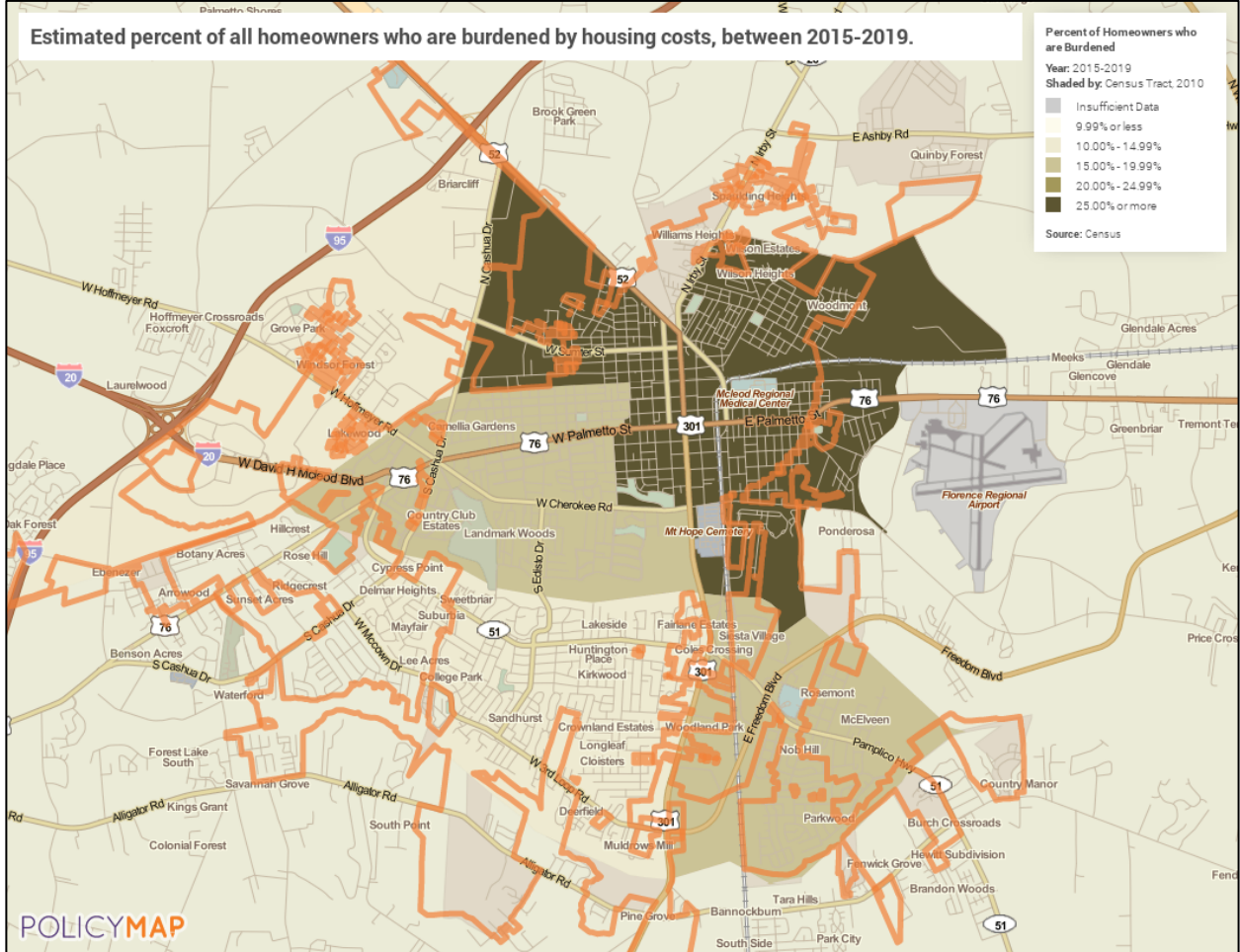
*Table: Monthly Housing Costs*

	Homeowners with a Mortgage		Homeowners without a Mortgage		Renters	
	Number	Percentage	Number	Percentage	Number	Percentage
Less than 20%	5,614	54.3%	2787	80.9%	1,428	24.2%
20.0 to 24.9%	905	16.1%	187	5.4%	865	14.7%
25 to 29.9%	346	6.2%	87	2.5%	640	10.8%
30 to 34.9%	363	6.5%	47	1.4%	545	9.2%
35% or more	950	16.9%	337	9.8%	2,426	41.1%
<b>Total Cost Burdened</b>	<b>1,313</b>	<b>23.4%</b>	<b>384</b>	<b>11.2%</b>	<b>2,971</b>	<b>50.3%</b>

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)

Within Florence there is one area that stands out as having a higher homeowner cost burden rate than elsewhere in the city. In the northeastern side of the city the homeowner cost burden rate is over 25%. As shown above, this tract also had a median household income that was lower than elsewhere. Households are less likely to be cost burdened in tracts in the southern and western part of the city.

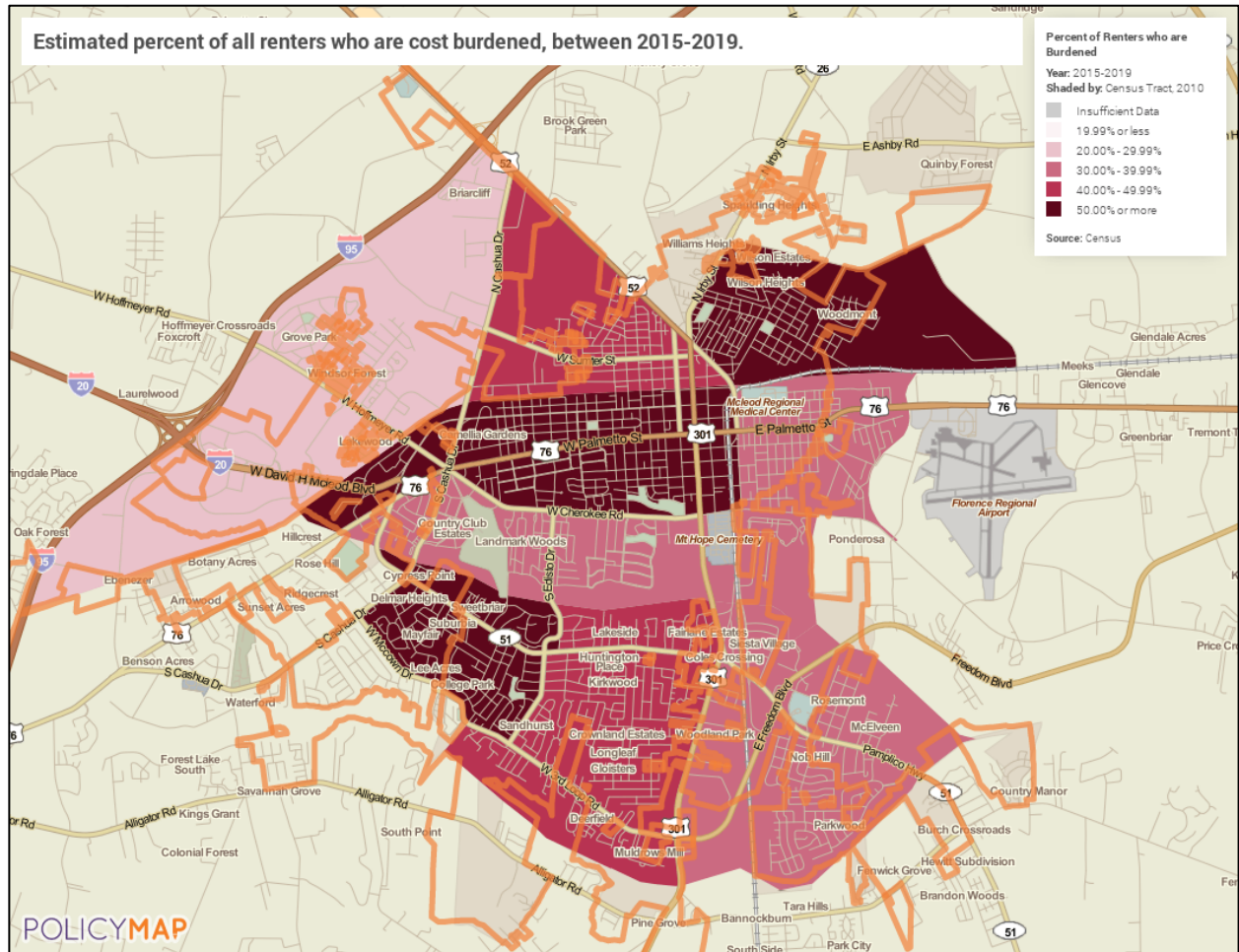
Map: Cost Burdened Owner-Occupied Households



Source: 2015-2019 ACS via PolicyMap

In Florence, the geographic cost burdened renters are found throughout the city. There are tracts in the northeast, central, and southwest part of the city with a relatively high cost burden rate (over 50%). There is only one area in the western part of the city where fewer than 30% of renters are cost burdened.

Map: Cost Burdened Renter Households



Source: 2015-2019 ACS via PolicyMap

Poverty

In Florence, the poverty rate has increased from 17.3% to 19.1% between 2010 and 2019. This change differs significantly from the state of South Carolina where the poverty rate has decreased by 1.2%. The change in poverty rate has caused the gap between the city and state to grow from 0.9% to 3.6%. As noted above, the purchasing power in the City of Florence has decreased, and the growth in poverty is related to this change.

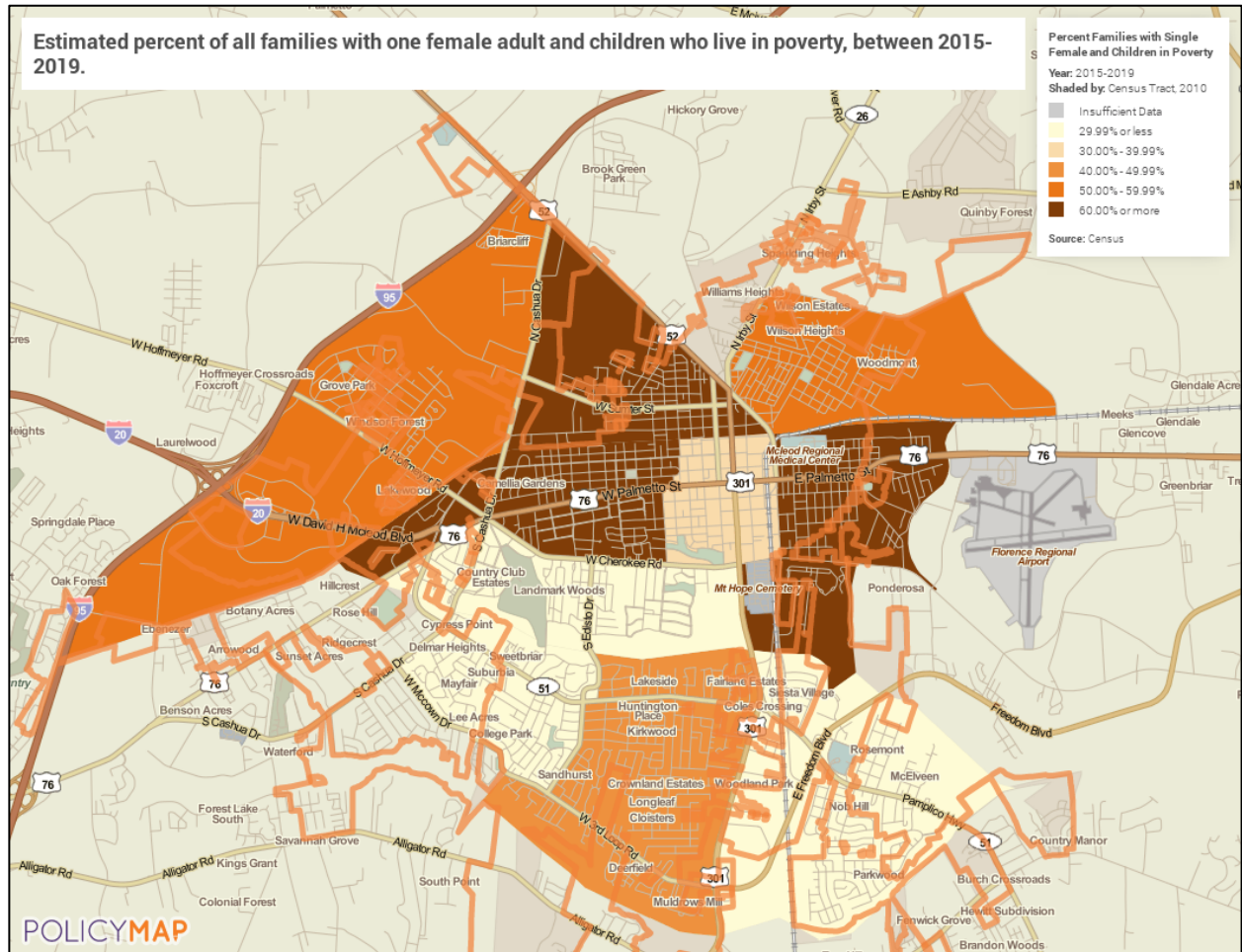
Table: Poverty Rate

	2010	2019	% Change
Florence	17.3%	19.1%	+2.4%
South Carolina	16.4%	15.2%	-1.2%

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP03)  
Data note: All people.

In Florence, poverty rates are linked to an area’s median household income. The lowest poverty areas are generally the ones that have a higher MHI. Low poverty areas have a poverty rate that is less than half what it is in high poverty areas where over 60% of the population is in poverty.

Map: Poverty Rate

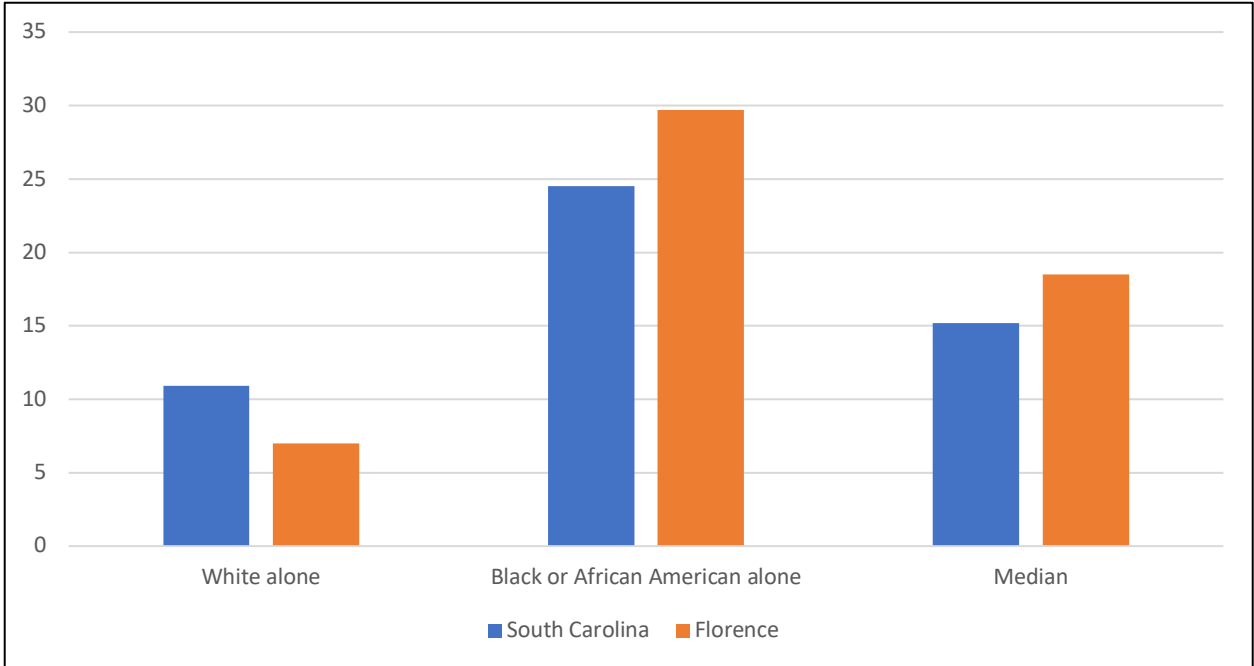


Source: 2015-2019 ACS via PolicyMap

Poverty and Race

In both the city and the state, the race or ethnicity of a household is correlated with the likelihood they live below the poverty level. The overall poverty level in the city is lower than the state poverty rate for White residents but higher for Black or African American residents. Black or African American residents have a poverty rate that is over 25% higher than White residents.

Chart: Poverty and Race

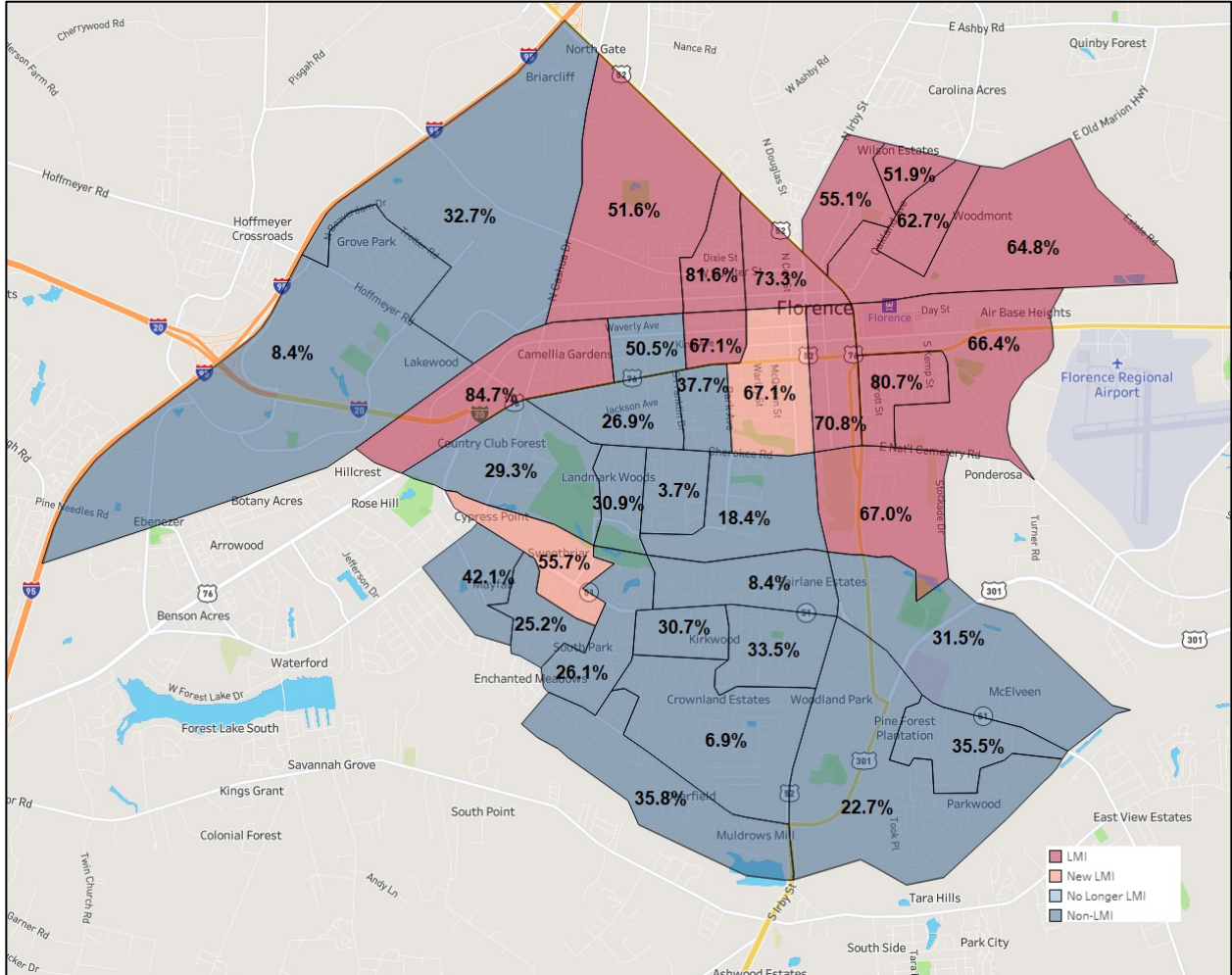


Source: 2015-2019 American Community Survey (DP03)

LMI Census Tracts

Every five years HUD publishes an update to the LMI Status of tract block groups. LMI block tracts are locations where at least 51% of the residents are LMI, which allows HUD grant programs to be classified as LMA benefit. In Florence, LMI tracts are found primarily in the northeastern part of the city. Residents in these areas need additional support to attain affordable housing.

Map: LMI Census Tracts



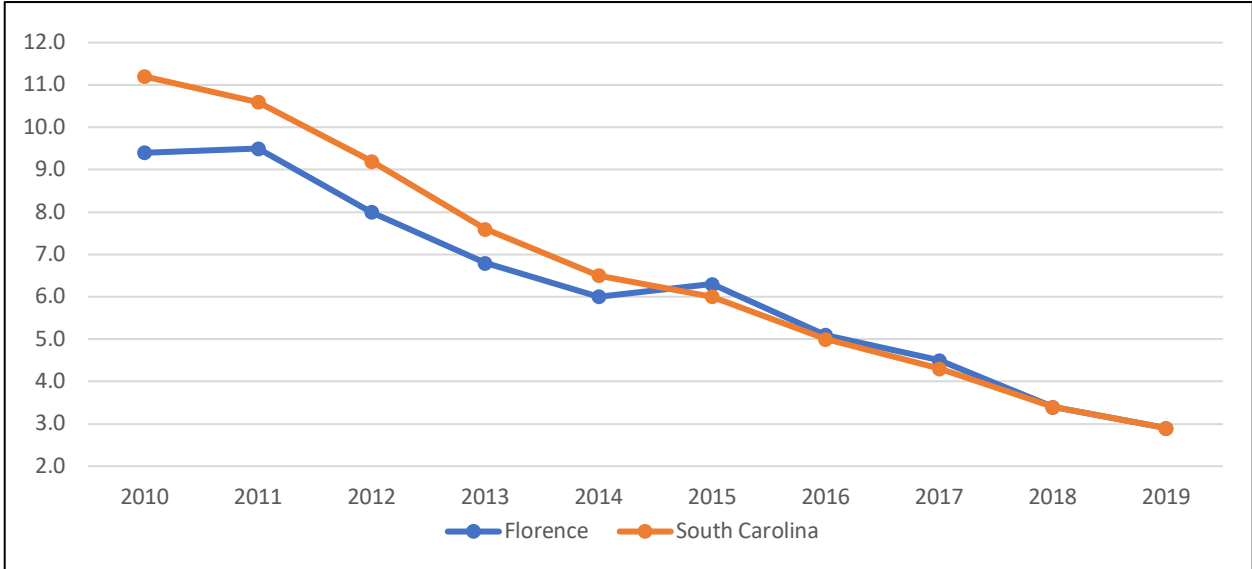
Source: HUD LMISD FY 2018 & FY 2020



Employment

The unemployment rate in Florence currently tracks closely with the statewide rate. Prior to 2014 the citywide unemployment rate was consistently lower than the statewide rate. Given the decrease in purchasing power, a major contributor to a household’s financial hardships may not be the lack of jobs but the lack of jobs that pay an adequate wage.

*Chart: Unemployment Rate from 2010 to 2019 (%)*

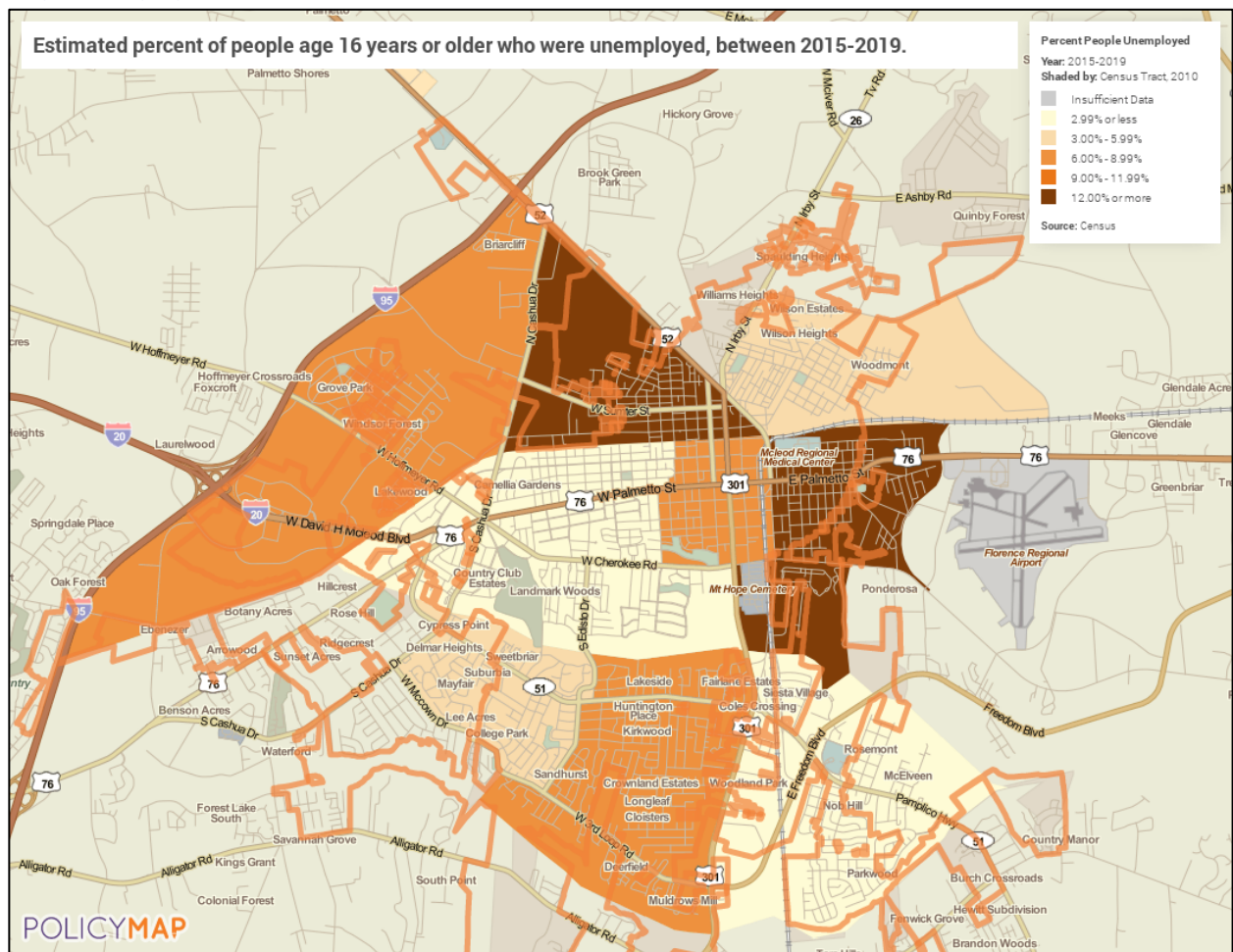


Source: BLS, Local Area Unemployment Statistics, not seasonally adjusted

The following map displays the unemployment rate based on data from the American Community Survey. The methodology used by the US Census Bureau differs from the one used by the Bureau of Labor Statistics. The varying sources may provide different numbers, but they each still show a valuable trend that can assist with decision-making. Unemployment rates from BLS are not available at the census tract level and thus cannot be used to identify concentrations within the city.

In Florence, the unemployment rate is highest in the northern and eastern part of the city. In those areas, over 12% of the civilian population are unemployed. The lowest unemployment rate can be found bordering the high unemployment rate area in the south and central part of the city. The low unemployment rate is approximately one-quarter the high unemployment rate.

Map: Unemployment Rate



Source: 2015-2019 ACS via PolicyMap

## Transportation

In Florence, commuting via personal vehicle is the most common form of transportation, by far. Over 91% of the city’s population uses personal vehicles, a rate slightly lower than the state as a whole. In Florence, the population is more likely to work at home than the state as a whole. Public transportation and bicycling are the least common forms of commuting with less than 0.5% of the population using those forms.

*Table: Commuting Method*

	<b>South Carolina</b>	<b>Florence</b>
Total Workers (16 Years and Older)	2,264,320	17,292
Car, truck, or van	91.6%	91.4%
Drove alone	82.4%	84.2%
Carpooled	9.2%	7.3%
Public transportation (excluding taxicab)	0.5%	0.3%
Walked	2.0%	0.6%
Bicycle	0.2%	0.2%
Taxicab, motorcycle, or other means	1.2%	2.0%
Worked at home	4.5%	5.4%
Source: 2015-2019 ACS 5-Yr Estimates (S0801)		

In Florence, the commute travel times grew between 2010 and 2019 by approximately one minute, on average. This change occurred primarily due to the drop in the percentage of residents commuting less than 10 minutes. Overall, 4.1% of residents spend 60 minutes or more commuting each day.

*Table: Travel Time*

	<b>2010</b>	<b>2019</b>	<b>Difference</b>
Workers 16 Years and Older (did not work at home)	15,441	16,355	+914
Less than 10 minutes	19.0%	16.4%	-2.6%
10 to 29 minutes	64.3%	65.4%	+1.1%
30 to 59 minutes	12.8%	14.0%	+1.2%
60 or more minutes	3.9%	4.1%	+0.2%
Mean travel time to work (minutes)	18.2	19.4	+1.2 minutes
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (S0801)			

# Housing Profile

## Housing Stock

Throughout Florence, one-unit detached structures make up a majority of all housing units. Since 2010, the housing stock in the city has grown slightly from 16,261 units to 18,133 units. There has been little fluctuation in the percentage of housing units by type. The largest change was single-family detached structures which grew by 1,230 units, or 10.7%.

HUD defines a single-family structure as a structure with one to four units. Using that definition, approximately 82.5% of all housing units are single-family. An important group of property types are called the “Missing Middle” and represent housing types that are neither 1-unit or large complexes with 20 or more units. These units tend to provide affordable housing options for many residents but are rare in many communities. In Florence, approximately 22.2% of all units are in this important group.

*Table: Property Type in 2010 and 2019*

	2010		2019	
	Number	Percentage	Number	Percentage
1-unit, detached structure	11,504	70.7%	12,734	70.2%
1-unit, attached structure	396	2.4%	291	1.6%
2 units	822	5.1%	729	4.0%
3 or 4 units	1,242	7.6%	1,219	6.7%
5-9 units	1,205	7.4%	1,325	7.3%
10-19 units	454	2.8%	763	4.2%
20 or more units	500	3.1%	839	4.6%
Mobile Home	138	0.8%	233	1.3%
Boat, RV, Van, etc.	0	0.0%	0	0.0%
Total	16,261	100%	18,133	100%

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)

The following table compares unit sizes from 2010 and 2019. Units with no bedroom, 3 bedrooms, or 5 or more bedrooms all became more common while the other units have a smaller representation. In 2010, approximately 63.2% of the city's housing stock were 3 bedrooms or more. By 2019, the housing stock of large units grew 3.7% to 66.9%.

*Table: Unit Size*

	2010		2019	
	Number	Percentage	Number	Percentage
No bedroom	94	0.6%	829	4.6%
1 bedroom	1,196	7.4%	938	5.2%
2 bedrooms	4,700	28.9%	4,237	23.4%
3 bedrooms	7,507	46.2%	8,956	49.4%
4 bedrooms	2,312	14.2%	2,537	14.0%
5 or more bedrooms	452	2.8%	636	3.5%
Total	16,261	100%	18,133	100%
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)				

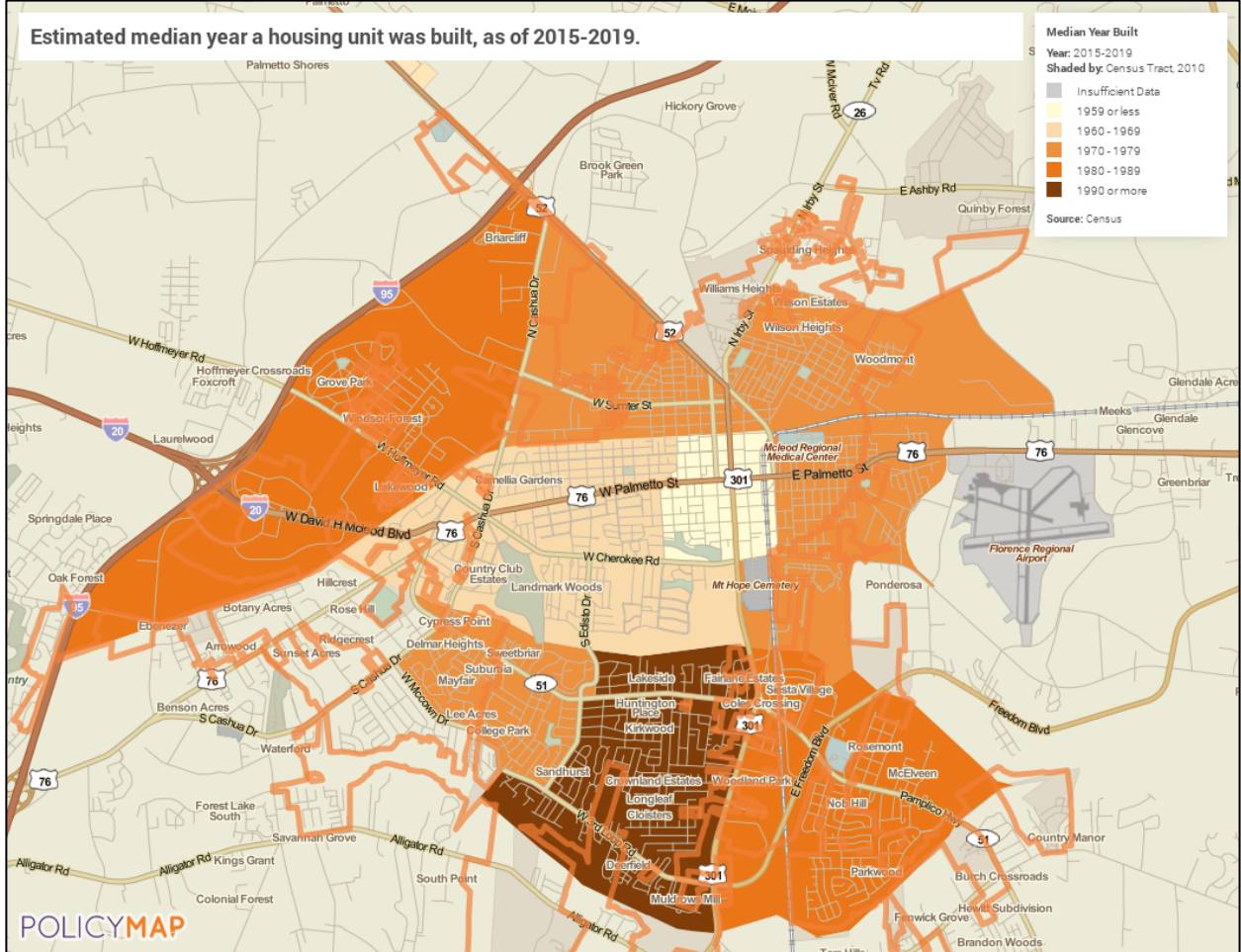
The housing stock in Florence is relatively old when compared to the state as a whole. Approximately 46.7% of the city’s housing units were built after 1980 and only 19.8% were built after 2000. At the state level 62% of the units were built after 1980. Units built prior to 1980 are at risk of having lead-based paint in them and require special care during rehabilitation. In Florence, 53.2% of the housing stock was built prior to 1980, or nearly 9,700 units in the city. A more extensive look at the age of housing and lead based paint hazard risk is completed in the city’s Consolidated Plan.

*Table: Year Unit Built*

	South Carolina		Florence	
	Number	Percentage	Number	Percentage
Built 2010 or Later	142,133	6.3%	862	4.7%
Built 2000 to 2009	445,055	19.7%	2,733	15.1%
Built 1990 to 1999	437,146	19.4%	2,445	13.5%
Built 1980 to 1989	374,939	16.6%	2,436	13.4%
Built 1970 to 1979	339,727	15.1%	2,799	15.4%
Built 1960 to 1969	204,732	9.1%	2,955	16.3%
Built 1950 to 1959	151,393	6.7%	2,221	12.2%
Built 1940 to 1949	67,247	3.0%	830	4.6%
Built 1939 or earlier	94,579	4.2%	852	4.7%
Total	2,256,951	100%	18,133	100%
Source: 2015-2019 ACS 5-Yr Estimates (DP04)				

In Florence, there appears to be a relationship between geography and age of housing units. Specifically, homes in the center part of the city are much older, on average, than elsewhere. The southern part of the city has a neighborhood with the newest housing units, the median year built is 1990 or more which is over 30 years newer than in the center of town.

Map: Median Year Built



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

## Occupancy Characteristics

Housing occupancy has experienced little change in Florence between 2010 and 2019. The occupancy rate fell by nearly 3% in that time period. However, the difference between owner and renter occupancy changed by less than 0.5%.

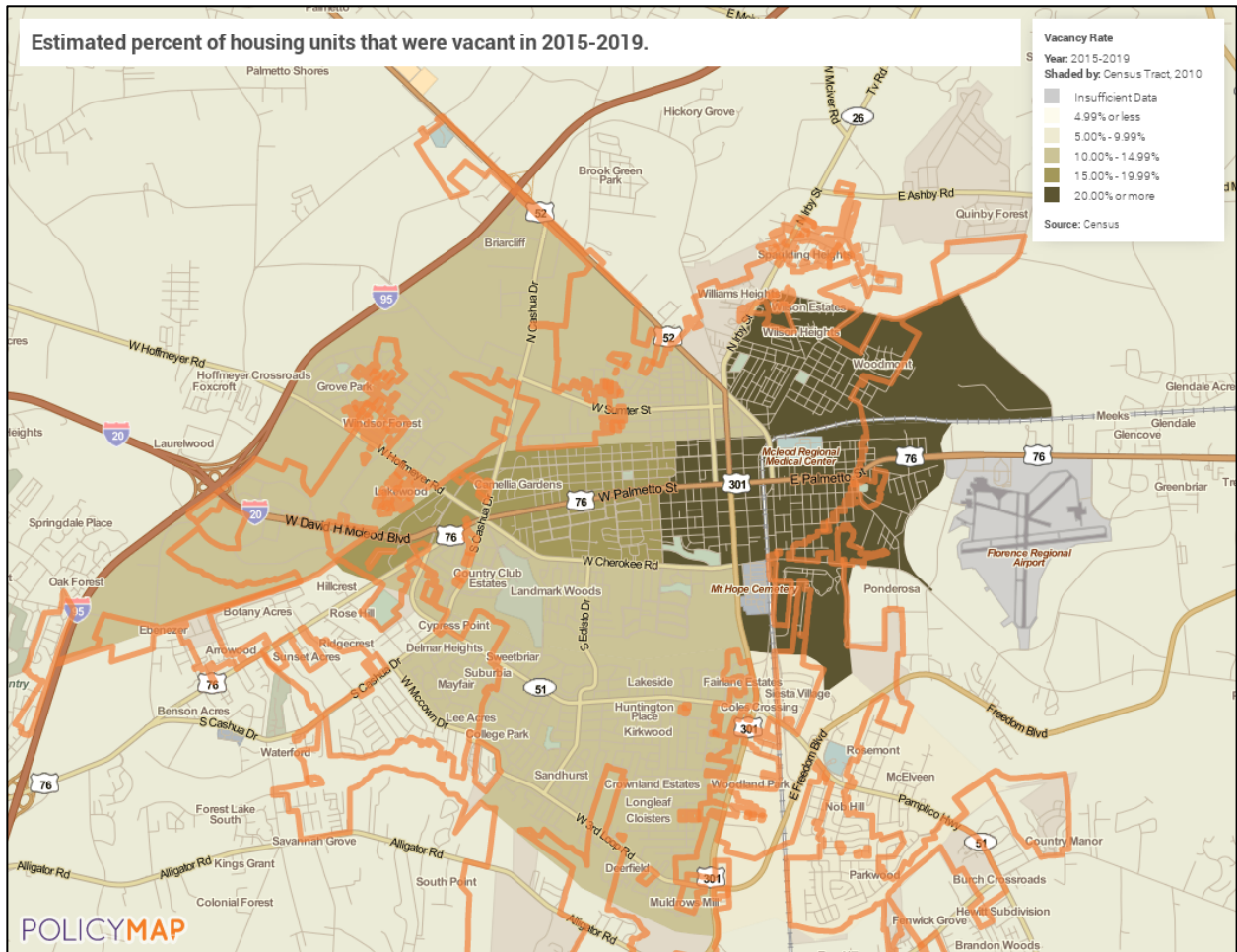
*Table: Housing Occupancy in 2010 and 2019*

	2010		2019	
	Number	Percentage	Number	Percentage
<b>Total Housing Units</b>	16,261	100%	18,133	100%
<b>Occupied Housing Units</b>	14,562	89.6%	15,624	86.2%
<i>Owner Occupied Units</i>	8,582	58.9%	9,138	58.5%
<i>Renter Occupied Units</i>	5,980	41.1%	6,486	41.5%
<b>Vacancy Housing Units</b>	1,699	10.4	2,509	13.8%
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)				



Throughout Florence the vacancy rate varies. The eastern area has a vacancy rate of 20% or higher which is lower than the neighboring tracts with a vacancy rate of less than 10% in some cases.

Map: Vacancy Rate



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

## Housing Production

Single-family units are the most commonly produced housing type in Florence, and they are also the most expensive. Developments with between 2 and 4 units are less commonly built in the city than single-family and larger developments.

*Table: Residential Construction Permits Issued by Year*

	1-Unit		2-Units		3-4 Units		5+ Units		Total	
	#	PPU	#	PPU	#	PPU	#	PPU	#	PPU
2010	259	\$125,702	34	\$50,969	0	--	15	\$60,000	308	\$114,253
2011	257	\$124,047	42	\$50,969	0	--	15	\$60,000	314	\$111,212
2012	210	\$157,008	10	\$33,500	18	\$113,667	0	--	238	\$148,540
2013	282	\$146,703	24	\$45,146	16	\$113,667	10	\$60,000	332	\$135,158
2014	234	\$153,430	6	\$77,000	0	--	40	\$77,500	280	\$140,945
2015	264	\$155,928	6	\$77,000	0	--	0	--	270	\$154,174
2016	325	\$158,895	24	\$67,333	15	\$62,267	24	\$53,942	388	\$143,004
2017	401	\$121,099	0	--	0	--	510	\$86,618	911	\$101,796
2018	422	\$141,957	10	\$81,900	3	\$150,917	28	\$65,857	463	\$136,116
2019	565	\$134,684	8	\$82,250	45	\$127,300	388	\$97,394	1006	\$119,554

Source: US Census Bureau, Building Permits Survey (BPS)  
 Data Source Comments: BPS data was available at the county level, PPU = Price Per Unit.

In 2010, the median sales price in Florence was \$114,253, one of the lowest median sales prices in the years analyzed. In general, the median sales price rose to a high in 2015 and then fell again. The number of homes purchased ranged from a low of 238 in 2012 to 1,006 in 2019.

*Graph: Housing Sales by Year*

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Median Sale Price	\$114,253	\$111,212	\$148,540	\$135,158	\$140,945	\$154,174	\$143,004	\$101,796	\$136,116	\$119,554
Home Sales	308	314	238	332	280	270	388	911	463	1,006

## Costs

The following section examines data on housing costs for owners and renters across the city between 2010 and 2019. The median home value of owner-occupied units increased by 11.2% while the median rent increased by 33.2%.

*Table: Housing Costs in 2010 and 2019*

	2010	2019	% Change
Median Home Value	\$142,600	\$158,600	11.2%
Median Contract Rent	\$451	\$601	33.2%

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04, B25058)

The availability of homes that cost less than \$150,000 has decreased throughout the city while higher cost housing units are becoming more common. In total, there are approximately 500 fewer units under \$150,000 in 2019 than in 2010. The largest change was in the \$200,000 to \$299,999 range which increased by almost 700 units and makes up 21% of the housing stock.

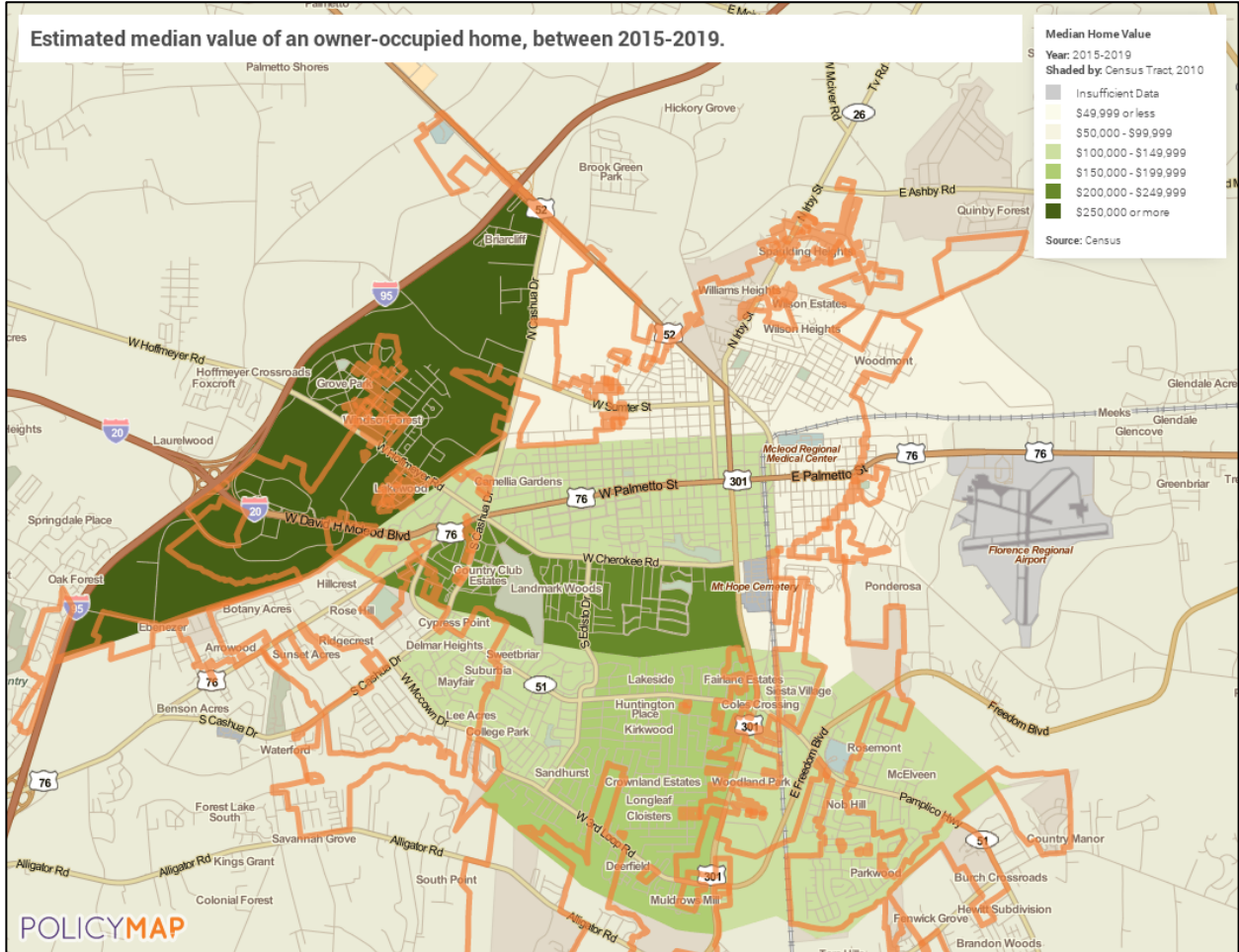
*Table: Home Value in 2010 and 2019*

	2010		2019	
	Number	Percentage	Number	Percentage
Less than \$50,000	490	5.7%	489	5.4%
\$50,000 to \$99,999	1,900	22.1%	1,579	17.3%
\$100,000 to \$149,999	2,244	26.1%	2,073	22.7%
\$150,000 to \$199,999	1,786	20.8%	1,975	21.6%
\$200,000 to \$299,999	1,231	14.3%	1,921	21.0%
\$300,000 to \$499,999	642	7.5%	705	7.7%
\$500,000 to \$999,999	262	3.1%	320	3.5%
\$1,000,000 or more	27	0.3%	76	0.8%
Total Units	8,582	100%	9,138	100%

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)

Home values, much like other data found in this document, appear to be linked with geography. In the western part of the city the median home value is over \$250,000 compared to tracts in the north and northeastern parts of the city are below \$100,000.

Map: Median Home Value



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

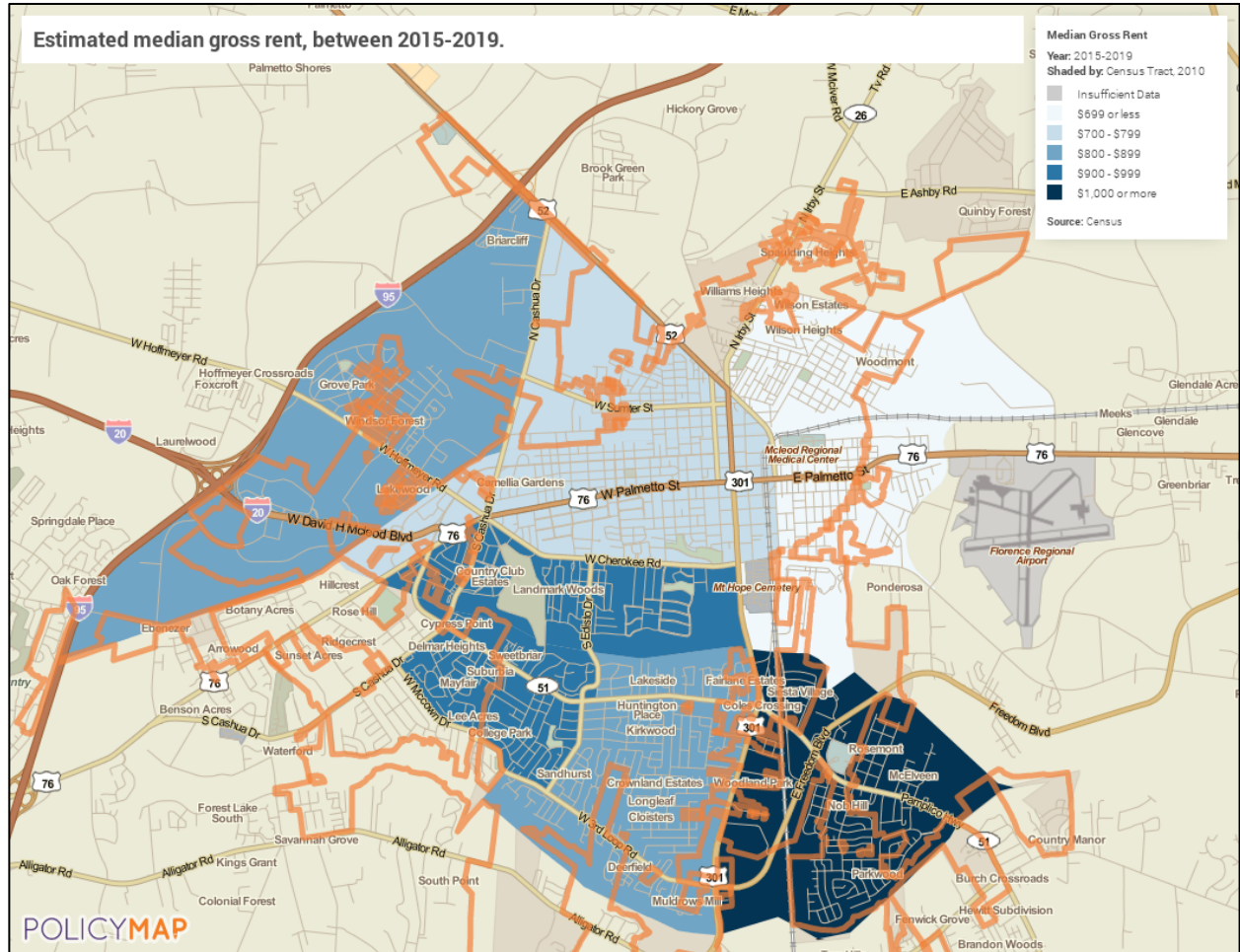
Low rent units are significantly less common in Florence than they were in 2010. There are a similar number of units priced under \$1,000, but the availability of units under \$500 has fallen. Previously, over one quarter of the units were in this lowest price group, but currently only 14.5% of rentals are less than \$500. This drop is the largest shift in the city.

Table: Rent

	2010		2019	
	Number	Percentage	Number	Percentage
Less than \$500	1,521	27.8%	873	14.5%
\$500 to \$999	3,576	65.2%	3,941	65.6%
\$1,000 to \$1,499	254	4.6%	989	16.5%
\$1,500 or more	134	2.4%	204	3.3%
Total Units	5,485	100%%	6,007	100%
No rent paid	495	(X)	479	(X)
Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP04)				
Note: Median Rent is calculated based solely on those renters actually paying rent.				

In Florence, median rent is related to location. However, areas with a high median rent do not match the areas with a high median home value. In the southeast corner of the city, rental prices are highest, on average over \$1,000. The north part of the city has the lowest median gross rent, less than \$700.

Map: Median Rent



Source: 2015-2019 ACS 5-Yr Estimates via PolicyMap

## Section II – Public Sector Analysis

The Fair Housing Act generally prohibits the application of special requirements through land-use regulations, restrictive covenants, and conditional or special use permits that, in effect, limit the ability of minorities or the disabled to live in the residence of their choice in the community. If large-lot minimums are prescribed or if a house must contain a certain minimum amount of square feet or if no multi-family housing or manufactured homes are permitted in an area, the results can exclude persons protected by the Act. If local mandates make it unfeasible to build affordable housing or impose significant obstacles, then a community must affirmatively work toward eliminating this type of impediment to fair housing choice. This section highlights various public sector mechanisms that promote fair housing choice.

### Comprehensive Plan

The City of Florence Comprehensive Plan is a policy document that plans for and guides future development and redevelopment. The city's Planning Department has been working to update the 2010 Comprehensive Plan by developing updated goals and strategies using extensive citizen input on topics like housing and neighborhood revitalization, community character and appearance, urban growth, economic development, transportation modes, and downtown renewal. However, the impacts of COVID-19 hampered the efforts to engage with the public.

The rollout of an updated Comprehensive Plan has been delayed, but the following themes from the 2011 Comprehensive Plan and the 2017 5-year update highlight the city's intention to promote fair housing choice through its planning goals and efforts, which include pursuing fiscally sustainable growth and development and maintaining quality integrity of housing and neighborhoods.

- Community Health:
  - Access to health, social services, and safe housing for all citizens;
  - Development of complete streets that are safe, walkable, and green;
  - Provision of education and training to enable good jobs and wages;
  - Neighborhood revitalization to boost community and economic health; and
  - Proximity to healthy food choices.
- Economic Development:
  - Attraction of employers that match local training and job skills;
  - Fostering entrepreneurship to facilitate new business development and job creation;
  - Placement of major employers in and around Downtown;
  - Redevelopment of corridors to provide new business and living opportunities;
  - Revitalization of neighborhoods, districts, and corridors to stimulate reinvestment; and
  - Retention and growth of existing employers.
- Community Livability:
  - Added recreational programming and parks serving all areas and neighborhoods;
  - Repurposing parks and multi-use public places as anchors of neighborhood and community gatherings;
  - Eliminating the “food desert” in central Florence through creation of a food district;

- Improved connectivity to aid local and regional mobility, including vehicular and non-vehicular improvements, e.g., transit, pedestrian trails and bikeways, circulation in Downtown, and linkage to major community assets and challenged neighborhoods; and
- Beautification of signature corridors and community and special district gateways.

Of note, new recommended actions that promote housing affordability for the Housing and Neighborhood components include:

- Add a narrow lot housing type to the Unified Development Code (UDC) to facilitate infill development of affordable dwellings.
- Develop a matching grant program for the conversion of upper floors of existing commercial structures to loft condominium and rental units in Downtown.

### Zoning and Land-Use

The city recognizes the need to ensure that all of its residents enjoy access to quality and affordable housing within livable and attractive environments. Chapter 5 of the Comprehensive Plan outlines the Housing and Neighborhoods section of the plan which identifies trends affecting existing neighborhoods, housing conditions, and future housing availability, as well as recommended strategies and actions for maintaining and improving Florence’s neighborhoods. Many of these goals overlap with known barriers to fair housing choice. A summary of various solutions and strategies are listed below.

**Focus Area 5.1** of the Comprehensive Plan aims to “Preserve and rehabilitate the existing housing stock.”

**Strategy 5.1.1:** Promote opportunities for neighborhood improvements and housing stock rehabilitation.

Some of the actions and initiatives include:

- Encourage redevelopment in targeted “at risk” areas through financial assistance programs, such as low-interest loans or outright property grants, that promote infill redevelopment in Florence neighborhoods.
- Form a target-area capital investment program focused on infrastructure improvements within defined at-risk neighborhoods.
- Incentivize home building on empty lots as infill development, in identified areas of need, with a one-time grant of \$3,000 to \$5,000.
- Pursue alternative code enforcement methods in an endeavor to be more proactive and ensure positive outcomes.

**Focus Area 5.3** is to “Ensure affordable and sufficient housing options in the future.”

**Strategy 5.3.1:** Provide housing options and assistance aimed at a variety of income levels and household age groups, both now and in the future. Actions and initiatives include:

- Continue to develop mixed-use and multi-family developments in the Downtown Redevelopment District.



- Continue to acquire infill sites or assemble larger areas for redevelopment. This strategy will keep the city actively involved in the infill market so that troublesome sites or vacant parcels can be sold to developers or a nonprofit organization, possibly at a reduced cost.
- Continue redevelopment efforts in targeted areas, as this transformation can help meet some of the housing needs for low- and moderate-income households.

**Strategy 5.3.2:** Utilize the city’s zoning regulations to encourage the development of moderate-income housing in the community. Actions and initiatives include:

- Establish an average, rather than a minimum, lot size whereby lot sizes are required to vary in width, with a certain percentage being narrower and the remaining being wider than the average.
- Provide a density bonus to offset any subsidized housing production in order to avoid significantly affecting the feasibility of the residential development.
- Provide fast-track application, permitting, and inspection provisions for the construction of infill housing or home renovations.
- Within the neighborhood conservation areas, establish provisions that allow comparable units on infill lots.
- Renew past efforts to incorporate accessory dwelling units in the city’s zoning regulations, along with appropriate provisions governing their use and compatibility.
- Allow greater variability in the parking requirements in the zoning regulations for multi-family units.
- Work with officials of Florence’s medical institutions for the consideration of in-city rental housing developments to accommodate transient or short-term medical staff residencies.
- Maintain sufficient land zoned as residential in the future as zoning regulations are updated.

Overall, Florence’s zoning code and land-use policies contain several good-faith measures and goals to promote affordable and multi-family housing. However, as the gap in affordability continues to widen, especially for low-income households, Florence may wish to enhance its goals and actions to promote affordable zoning through redesigned zoning and land-use regulations. The Comprehensive Plan lists “Auto-Urban Multi-Family” zoning as using 4.2% of the total city land-use (10.6% of reserved residential zoning). Comparatively, the city zoning reserved primarily for single-family housing uses 35.6% of the city’s total acreage, with single-family housing making the bulk (89.4%) of residential-zoned land (“Auto-Urban Single-Family Residential” (18.9%), “Suburban Residual” (15.8%), and “Estate Residential” (0.9%)).

Though city zoning ordinances are not overly restrictive, as the city updates its Comprehensive Plan a continued effort to reduce requirements that may unintentionally add barriers and limit access to affordable housing, especially multi-family housing, should be pursued.

## Community Development Block Grant (CDBG)

Entitlement grants are awarded to urban communities on a formula basis to support affordable housing and community development activities. The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for low- to moderate-income individuals and families. The City of Florence receives an annual allocation of CDBG funds from HUD, which are used to fund eligible housing and public service programs meeting the needs of low-to-moderate income individuals and families. Activities can include:

- Acquisition/Rehabilitation
- Homebuyer Assistance
- Homeless Assistance
- Economic Development
- Public Improvements
- Public Services

In order to achieve the program objectives, each qualifying activity must meet one of the three broad National Objectives:

- a. Primarily benefit low- and moderate-income families. More specifically, 51% of the project must benefit families with incomes at or below 80% of the median income.
- b. Aid in the prevention or elimination of slum or blight. Activities considered to aid in the prevention or elimination of slum or blight are activities located within a designated area which: 1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under state or local law; and 2) where there is a substantial number of deteriorating or dilapidated buildings or needed improvements throughout the area.
- c. Meet urgent community development needs. Proposed project must meet needs that have a particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet the needs.

The city's community and neighborhood development activities are administered through the Department of Community Services. The City of Florence's CDBG program focus includes allocating resources to the following:

- **Housing:** Provide housing opportunities for first-time homebuyers and offer housing rehabilitation to its low-to-moderate income citizens.
- **Homelessness:** Help alleviate the occurrence homelessness.
- **Community Development:** Improve the quality of life through improvements in park and recreational facilities.

## City of Florence Assistance Programs

The City of Florence has taken a proactive role and implemented public policies to encourage affordable housing opportunities through a range of several programs. Some of the city's policies and programs most relevant and beneficial in supporting the expansion of affordable and fair housing in Florence include:

- **Participation in the Hometown Heroes Program.**

This program supports homeownership for Florence residents. A Florence bank offers affordable housing grants of \$7,500 to teachers and educators who work for Florence One Schools. These grants are through the Federal Home Loan Bank Hometown Heroes program to assist in revitalization efforts with a focus on encouraging home purchases by educators.

- **Participation in the Palmetto Heroes Program**

This program, offered by SCHousing, offers affordable housing grants up to \$12,000 to teachers, and first responders, medical personnel, veterans, and current military.

- **Funding a Homeownership Assistance Program.**

Another city policy that supports home ownership is assistance up to 20% of the purchase price in down payment and closing costs to eligible applicants in three targeted neighborhoods of the city.

- **Supporting Residential Demolition Assistance.**

The City of Florence provides CDBG financial assistance to low -moderate income homeowners in the CDBG Target Area to demolish their dilapidated residential units, potentially leading to new home construction on the newly cleared lots

- **Financial Support for Housing Redevelopment.**

The City of Florence has funded housing redevelopment through its' neighborhood redevelopment project in core neighborhoods, such as the construction of seven new homes at Vista Place and 1 new home in Northwest Florence

- **Using of Public / Private Partnerships (PPP) for Housing.**

The city uses public/private partnerships to leverage public resources. The Old Carver Station homes are a good example of this practice. New single-family homes are part of a comprehensive revitalization plan and build off other projects within and around the downtown area. Construction of the Old Carver Station homes is the result of a public/ private investment partnership between the city and the private sector (Swinton Builders).

- **Partnership with Habitat for Humanity**

In 2018, the City started a 10 year partnership to convey up to 3 vacant properties annually to the Greater Florence Habitat for Humanity to build new homes for low-income families. The city also provides up to \$25,000 in housing upgrades in the construction of these homes.

- **Addressing Mortgage Lending Practices.**

In response to previous housing-related impediments, city officials met with banking officials to discuss their Community Reinvestment Act (CRA) data, Home Mortgage Disclosure Act (HMDA) data, and to address impediments to fair housing and unfair lending practices. The city addressed this impediment by requesting the local banking community adopt and implement proactive guidelines to reform practices and increase lending to minorities in the city.

- **Enacting a Rental Registration Program.**

In 2020, the city adopted a Residential Rental Registration Ordinance (Ordinance No. 2020-35), which establishes a rental registry for all single-family and multi-family rental properties. All property owners that operate residential rental unit(s) within the municipal limits are required to obtain a rental permit by July 1, 2021. This ordinance encourages landlords and tenants to maintain habitable housing; establishes direct lines of communication between city staff and property owners and managers; and is consistent with the city's Comprehensive Plan and Neighborhood Revitalization Strategy.

- **Practice and Utilize Cross-sector Collaboration to Address Homelessness.**

Homeless persons in Florence have the opportunity to secure a range of social services as a result of the city and Florence County's cross-sector collaboration to address their needs. Specifically, the City has partnered with organizations like The Eastern Carolina Housing Organization (ECHO), The Salvation Army, Manna House, House of Hope, and Lighthouse Ministries to work together to support needs of the city's homeless population. The City formed the "Mayor's Coalition" which helped develop a program called No One Unsheltered - a partnership of all shelter organizations in Florence to address the homeless situation. This partnership encourages all service providers to communicate with each other daily and nightly to provide services needed by low income and homeless persons and to leave no - one unsheltered nightly.

- **Established the Florence Homeless Court.**

The City established a homeless court within the municipal court system in 2019. This court strives to assist homeless persons with a misdemeanor charge to better access services and through their favorable efforts to have their charge dismissed or reduced depending on the circumstances. The court had already had several candidates fulfill all requirements and completed the Homeless Court program.

Four-Factor Analysis – Language Action Plan

**Purpose:** In compliance with Executive Order 13166, the City of Florence developed the following Four-Factor Analysis and Language Action Plan (LAP) for Limited English Proficiency (LEP) persons living in the city. Due to the importance of HUD programs and the universal availability of some programs, the entire jurisdiction was analyzed. Additional four-factor analyses can be conducted on a program basis with a more limited geographic range.

**History:** Under Federal law Title VI of the Civil Rights Act of 1964, discrimination was made illegal in programs that received federal financial assistance. In particular for LEP persons, it protects individuals on the basis of their race, color, or national origin. In certain situations, failure to ensure that persons who have LEP can effectively participate in, or benefit from, federally assisted programs may violate Title VI’s prohibition against race/ethnicity and national origin discrimination.

Persons who, as a result of their race/ethnicity and national origin, do not speak English as their primary language and have limited ability to speak/read/write, or understand English may be entitled to language assistance under Title VI in order to receive city services, benefits, and/or participate in sponsored programs.

**Four-Factor Analysis:** There is no specific method for ensuring compliance, but undertaking a four-factor analysis, adoption of a Language Access Plan (LAP) for vital materials and making necessary translation will be considered “strong evidence” of compliance.

**Factor 1:** Determine the number or proportion of LEP persons in the eligible service population. HUD provides the following guidance for what documents should be provided and when:

*Table: Factor 1 Guidance*

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more LEP persons in eligible population	Translate vital documents
>5% of eligible population and more than 50 are LEP persons	Translate vital documents
>5% of eligible population and 50 or less are LEP persons	Translated written notice of right to receive free oral interpretation of documents
5% or less of eligible population and < 1,000 are LEP persons	No written translation required

Source: HUD

**Factor 2:** The frequency with which LEP persons come in contact with the program.

**Factor 3:** The nature and importance of the program, activity, or service.

**Factor 4:** The resources available and costs to the recipient.

Examples of language assistance includes but is not limited to oral interpretation, bilingual staff, telephone service lines interpreter, written translation services, notices to staff and recipients about the availability of LEP services, or referrals to community liaisons. When the four-factor analysis is complete the jurisdiction should produce a Language Access Plan and follow through with the plan.

**Summary:** Overall, the City of Florence does not have a significant limited English proficiency population that may require translation services. In 2019, an estimated 1,489 individuals spoke English less than “very well,” with Spanish speaking individuals the largest part of this group with 765.

Primary Language Spoken at Home	Limited English Proficiency (Individuals)	
	Number	Percentage
<b>Population 5 years and over</b>	<b>38,184</b>	--
Spanish	765	2.16%
Other Indo-European	215	0.16%
Vietnamese	180	0.51%
Other	329	0.9%

Source: 2015-2019 ACS

**Conclusion:** Based on the low percentage of LEP population, the City of Florence is not required to establish a formal language assistance plan. However, the city is committed to ensuring that all residents have access to affordable housing, and translation services will be provided upon request.

## Section III – Private Lending Analysis

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, city, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board; have a home or branch office in one or more metropolitan statistical areas (MSA); or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10% of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

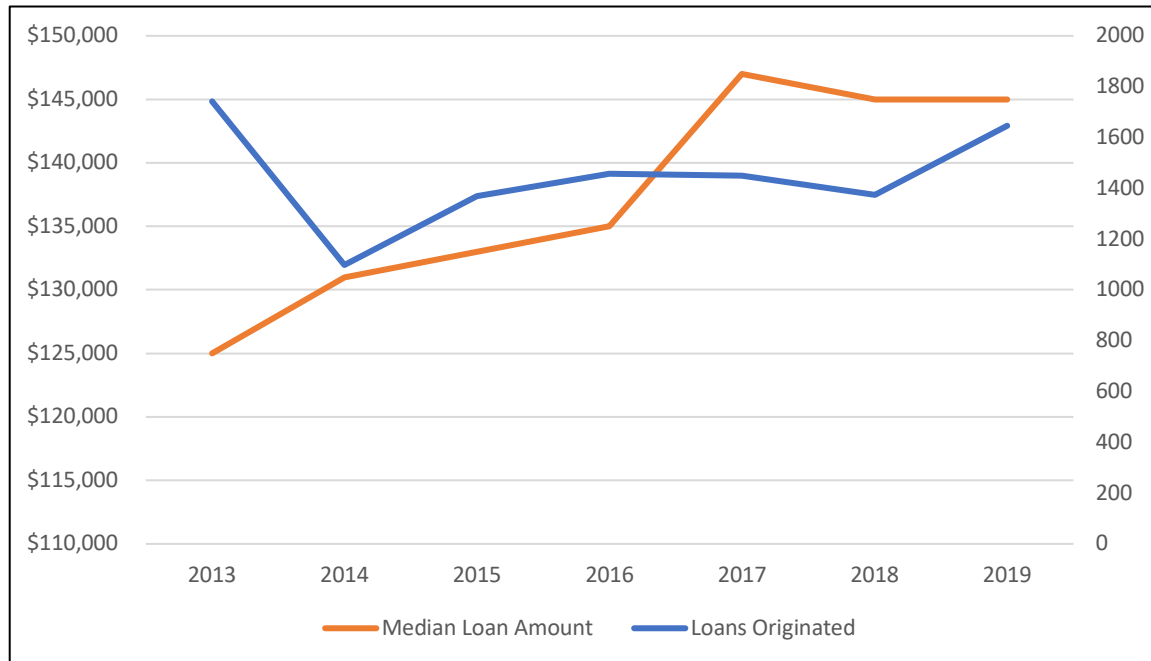
It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data.

For the purposes of this analysis and due limitations of FFIEC reporting, Florence City Metropolitan Statistical Area (MSA) was used as the baseline to establish data insights from the HMDA reports. Hence, the data examined is not exact, since it includes transactions that were outside the city boundaries, but still within the MSA boundary. The reported information provides enough of statistical significance to understand the trends within the city and fulfill the scope of this report. Extrapolations and estimates

were made if needed. It is also worth noting the recent increase in national and regional lending institutions with a comprehensive and all-inclusive online lending process. Highlights of those trends are mentioned when deemed noteworthy.

In 2019, there were 1,645 loans originated in Florence. The median loan amount was \$145,000. Since 2013, the number of loans originated has ranged between 1,098 (2014) and 1,742 (2013). During this period, the median amount has trended upwards from a low of \$125,000 in 2013 to the current amount of \$145,000. Just under 70% (1,140) of the 2019 originations came from lenders with a local presence.

*Graph: Loan Originations, 2019*

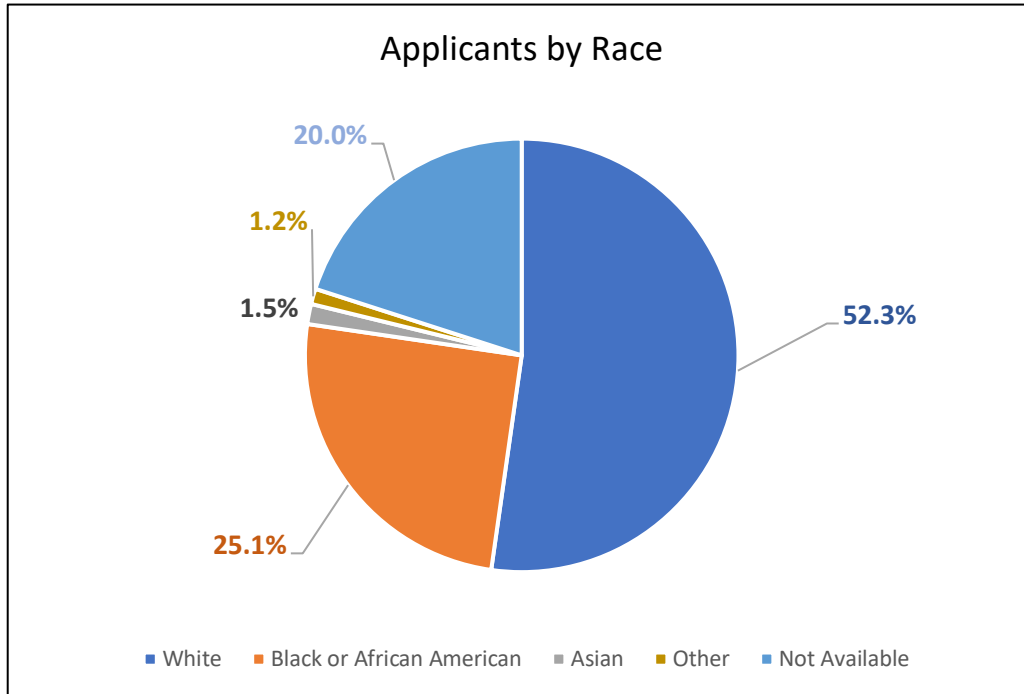


Source HMDA



In Florence, over half of loan applicants were White. The second largest group was Black or African American residents making up 25% of applicants. The third largest group did not have the race of the applicants available. Black or African American applicants were a little more likely to use regional or national (online) lenders compared to other races, with 53.1% of all Black applicants using a lender without a local presence (White, 34.1%, Hispanic 36.7%, Asian 26.2%)

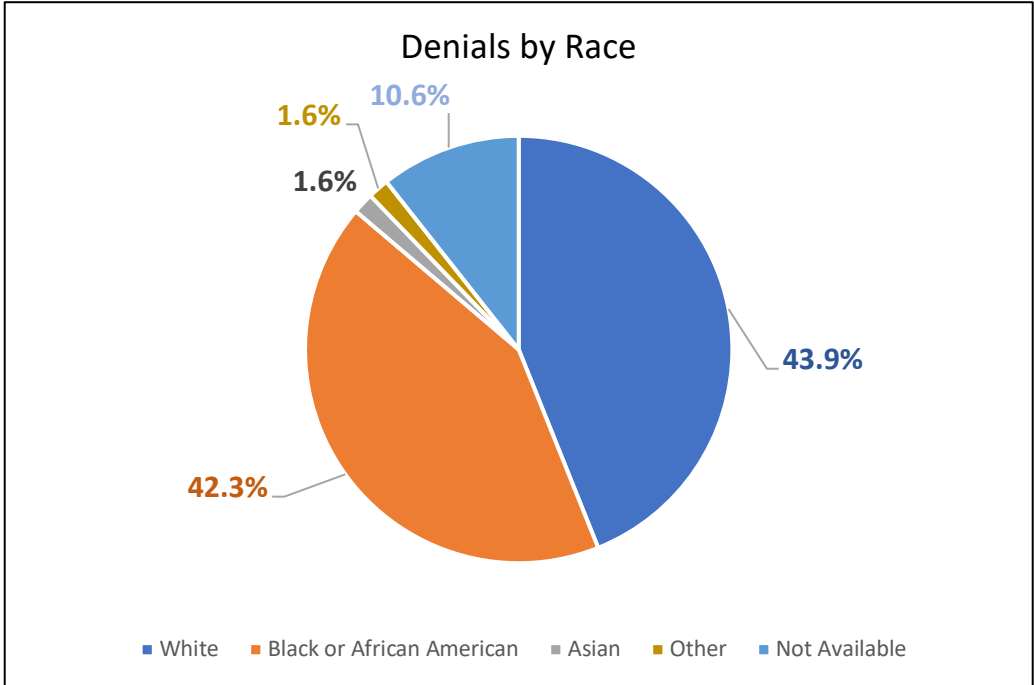
Chart: Applicants by Race



Source HMDA

In Florence, the denial rate and application demographics differ. The most significant difference is the application rate and denial rate for Black or African American households. Black or African American residents made up approximately 25% of all applications but over 40% of all denials. There is not a substantial difference in racial or ethnic group denial rates between local lenders in Florence and online or national lenders. Note, the balance of the applications that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant.

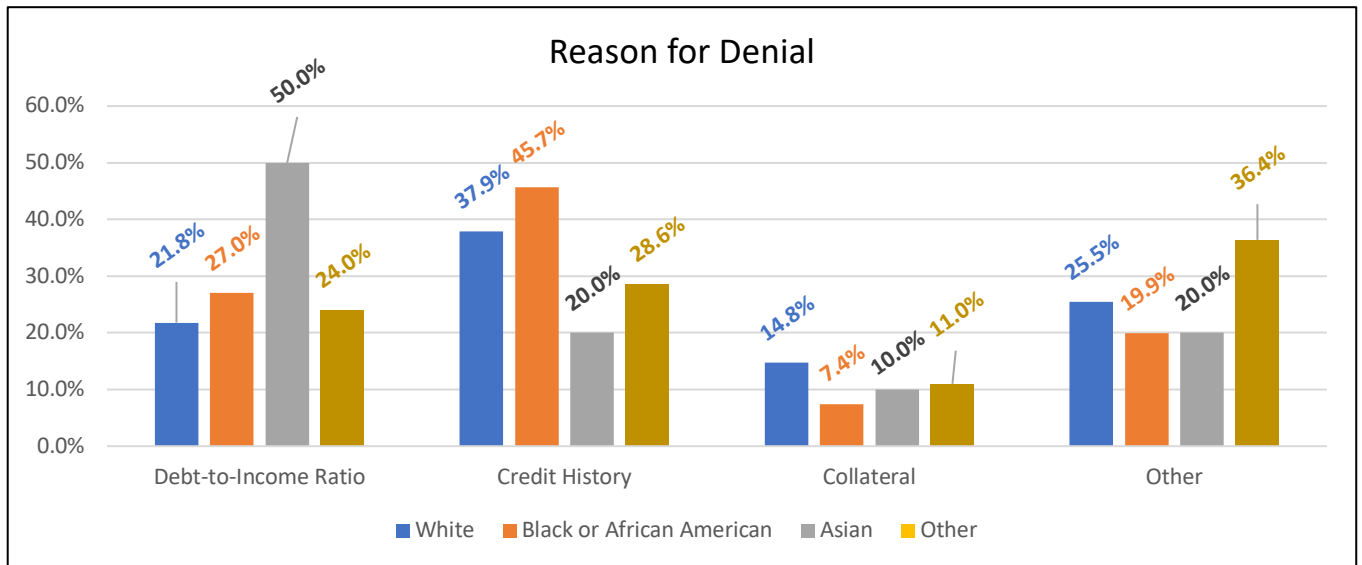
Chart: Denials by Race



Source HMDA

The most common reason for an application denial was debt-to-income ratio, credit history, and lack of collateral. Nearly half of all denials for Black or African American residents was due to credit history. Credit history was the most common reason for denial for White residents as well, but not to the same degree. These insights help identify potential areas where the City and local stakeholders can contribute to homeownership education, credit repair or establishment, and improving opportunities to address debt-to-income ratio.

Graph: Reasons for Denial



Source HMDA

Note: Financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan.

# Section IV – Fair Housing Profile

## Fair Housing Complaints

Fair housing complaints can be used as an indicator to identify heavily impacted areas and characteristics of households experiencing discrimination in housing. The Fair Housing Act lists seven prohibited bases for discrimination: race, color, national origin, religion, sex, disability, and familial status. The Fair Housing Act makes it unlawful to coerce, threaten, intimidate or interfere with anyone exercising or aiding others in enjoying their fair housing rights.

The following analysis considers fair housing complaint data filed against respondents in Florence with the U.S. Department of Housing and Urban Development (HUD) between 2016 and 2020. Using this data, the report identifies and analyzes the following:

- Absolute number of complaints filed with HUD in the city
- Basis of complaints filed
- Issues of complaints filed

While conducting the analysis, several data limitations were identified. Though not exhaustive, the list below summarizes the most important limitations of the datasets. The complaint process relies on people self-reporting, and the data represents only those complaints that were filed. Due to lack of knowledge or resources, instances of discrimination are often under-reported. Though five years of data provide a basis for simple analysis, a longitudinal approach of complaint outcomes is not possible in this analysis. HUD’s dataset only includes closed cases that were filed during this time period.

A total of 11 fair housing complaints were filed with HUD between 2016-2020. An equal amount of the complaints by bases included disability discrimination or race discrimination as the sole factor or in combination with other reported issues (45.5%) each. National origin, retaliation, or familial status made up the other bases of complaints.

*Table: Fair Housing Complaints in Florence from 2016 to 2020*

Violation City	Filing Date	Bases
Florence	03/15/17	Race
Florence	07/07/17	Race
Florence	09/29/17	Familial Status
Florence	12/20/17	Disability, Retaliation
Florence	02/22/18	Race, Retaliation
Florence	03/08/18	Disability, Retaliation
Florence	01/02/20	Race
Florence	03/25/20	Race
Florence	04/16/20	Disability
Florence	04/16/20	Disability
Florence	08/14/20	National Origin, Disability

Source: HUD

## Citizen Participation Process

In outlining their vision for the development of this document, the City of Florence staff sought the widest input from residents, stakeholders, not-for-profit organizations, city staff, and community and government leaders. To this end, the city contacted representatives of various housing organizations, social service agencies, faith-based organizations, and governmental institutions to participate in public meetings and a community survey. The survey contained a range of questions about possible impediments relating to fair housing discrimination, education, and causes.

In order to educate the public on the Analysis of Impediments to Fair Housing Choice process and gather comments that were used to develop this AI, the city hosted two virtual public meetings on April 22, 2021.

## Fair Housing Survey

The City of Florence administered a citywide survey on residents' experiences with the local housing market from April 1, 2021 through May 31, 2021. It was available online and circulated on city website, social media, neighborhood groups, and public meetings. The community survey received 43 total responses. The stakeholder received 37 total responses. There were several questions in the survey related to housing discrimination experiences, perceptions, issues, etc:

1. How common do you think housing discrimination based on race, color, national origin (ancestry from outside U.S.), sex (male or female), familial status (makeup of family; age of kids), sexual orientation (sexual preference), religion, or disability occurs in your community? Do you believe housing discrimination is an issue in your neighborhood?
2. Rate the following sources (housing ownership vs rental market) of housing discrimination based on how common you think they occur in your community.
3. How would you rate your understanding of fair housing laws and the issue of housing discrimination?
4. Have you experienced discrimination while looking for housing based on your race, color, gender, religion, disability, national origin, sexual orientation, marital status or family status? (Y/N)
5. Who do you believe discriminated against you?
6. On what basis do you believe you were discriminated against?
7. If you believe you have been discriminated against, have you reported the incident?
8. If you believe you have been discriminated against and did not reported the incident, why?
9. Have you ever witnessed or are aware of others being discriminated against in housing in your community?

10. If yes, who discriminated in housing?

Survey Takeaways

Over sixty five percent of the community survey responders believe housing unlawful discrimination is 'fairly common' or 'very common' in their community. Race, color, familial status, and disability were the leading categories of real or perceived discrimination. Near 40% of responders believed discrimination for both housing ownership and the rental market is 'very common'. Just over 24% of the respondents reported having personally being discriminated against for housing. Race and/or color were the leading reasons cited with 89% and 44.4% respectively. Fifty-one percent of stakeholders believe housing discrimination exists in your service area. Stakeholders also reported discrimination in both lending practices and clients trying to obtain rental housing,

With this small of a sample size, it's difficult to make any absolute conclusions of how widespread unlawful housing discrimination is compared to perceptions. The community values fair housing education, but low-level of fair housing complaints indicate a disconnect between fair housing knowledge and understanding how reporting discrimination can further protect one's rights. This gap may provide context for the city to revamp its fair housing education efforts to ensure households, landlords, real estate professional understand fair housing rights and the ramifications of unlawful discrimination.

## Section V – Identification of Impediments to Fair Housing Choice

The Analysis of Impediments to Fair Housing Choice consists of a comprehensive review of local housing-related ordinances and laws, regulations, policies, barriers, and practices affecting housing affordability, accessibility, availability, and choice within the City of Florence. It also outlines specific actions to address these barriers. The major impediments to fair housing choice are presented in two categories:

- Fair Housing-Related Impediments
- Affordable Housing-Related Impediments

The conclusion of this analysis has identified several current impediments to fair housing choice. For each impediment, strategic recommendations have been identified that can help alleviate these impediments moving the City of Florence forward. While each impediment has been assigned a recommended action, it is important to note that many of the actions will have an overlap effect that can address multiple impediments. The City of Florence leaders and stakeholders recognize that there are important steps to mitigate these barriers to housing choice and affordable housing, including a combination of planning, legal, and financial tools. These recommended actions seek to not only build on existing policies, practices, and programs, but offer new or expanded actions that will stimulate new residential investments and increase the supply of affordable housing in the city. The recommended actions will guide the City of Florence to reduce and eliminate existing housing discrimination and prevent its effects in the future, as well as to address other impediments to equal housing opportunity. The City is committed to work to coordinate actions that improve fair housing choice, increase affordable housing access, encourage coordination among public entities, encourage stakeholders to act and report on fair housing issues, and encourage meaningful action and cooperation at community levels.

Key findings identified in this analysis to fair housing choice are:

1. An Older and Aging Housing Stock
2. Zoning and Land Use Policies that Constrain Housing Diversity
3. A Disconnect Between Fair Housing Complaints and Perceived Housing Discrimination.
4. A High Percentage of Renters Who are Cost Burdened
5. Declining Household Purchasing Power
6. A Growing Poverty Rate
7. Significant Income Inequality Between Race and Ethnicity
8. Increasing Housing Instability: Higher Rates of Renter Evictions and Risk of Homelessness.

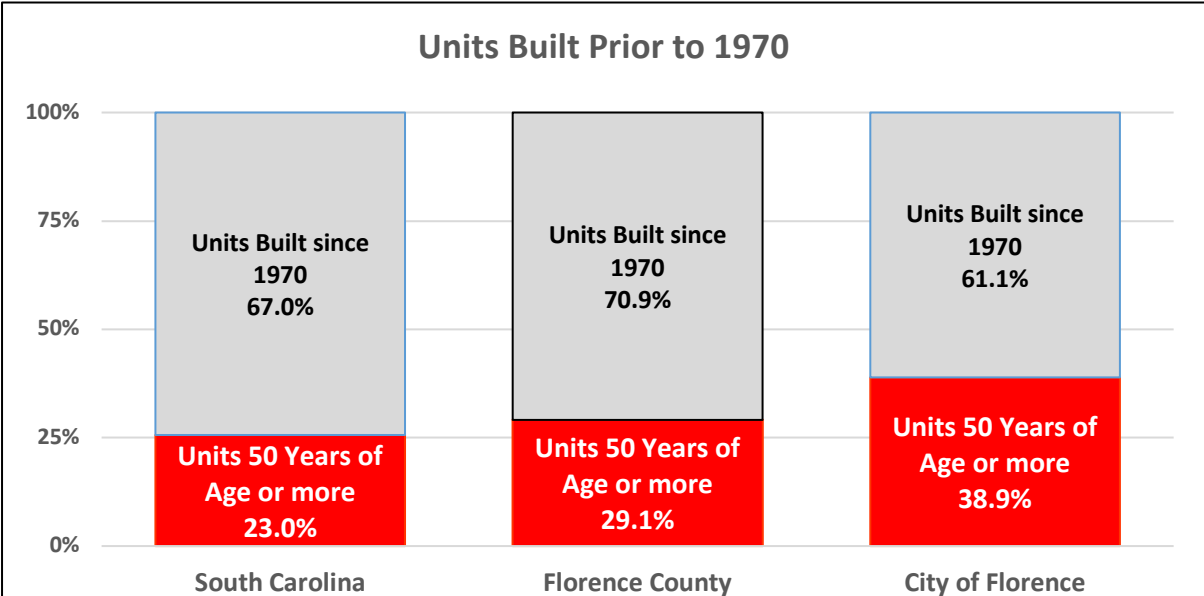
Fair Housing-Related Impediments

**Impediment 1: An Older and Aging Housing Stock Requires Increased Investment and Maintenance.**

The housing stock in the City of Florence is older compared to Florence County and South Carolina. Nearly 40% of the city’s housing units were built prior to 1970. This compares to 23% in South Carolina and 29.1% in Florence County that are 50 years of age or older.

Units built prior to 1970 are at higher risk of having lead-based paint impacting residents health and requiring special care during rehabilitation. While maintaining the existing housing stock is an important need for the city, older residential neighborhoods need investment to ensure that the housing stock does not further decline to the point of requiring demolition.

*Graph: Housing Units Built Prior to and Since 1970*



**Action 1.1 – Adopt the Existing Building Rehabilitation Code.**

Encouraging increased residential rehabilitation is especially meaningful to the City of Florence given the aging housing stock. Many cities have adopted specific codes for rehabilitation and renovation. The most immediate and common approach is adoption of the International Existing Building Rehabilitation Code (IEBC). The code addresses residential repair, renovation, alteration, reconstruction and can be applied when there is a change of occupancy.

The IEBC was prepared in consultation with Department of Housing and Urban Development (HUD) and the construction trade industry. This code is widely utilized by many cities and counties for facilitating and stimulating rehabilitation and renovation. It is recommended that the City of Florence adopt and utilize this code.



## **Impediment 2: The Zoning Ordinance and Land Use Regulations Constrain Housing Diversity.**

There are various regulations and zoning restrictions within the Florence zoning codes that impede the facilitation of new residential development. Zoning laws that overly promote single-family homes or restrict ease of multi-family developments can often prevent low-income households' ability to choose where they live by pricing them out of neighborhoods. Achieving housing diversity objectives are obstructed, in part, by regulations that discourage new residential investment, which is especially relevant to stimulating the development of affordable housing. Examples may include minimum lot sizes, height restrictions, zoning restrictions, etc.

Most of the city's residential use is zoned for single-family housing. The fraction of single-family versus multi-family units can influence the affordability of an area, but also increases the choice component for the low- to moderate-income households. Furthermore, as previously noted, an important group of property types are called the "Missing Middle" and represent housing types that are neither 1-unit or large complexes with 20 or more units. These units tend to provide affordable housing options for many residents but are rare in many communities. In Florence, approximately 22.2% of all units are in this important group.

### **Action 2.1 – Evaluate and Update the Zoning Ordinance and Land Development Regulations.**

Additional amendments to the city's zoning ordinance can support the development of low and low-to-moderate income housing and remove barriers to affordable housing in the city. Key revisions may include the following:

- a) Offer Density Bonuses - Increase in residential density should be allowed in all zoning districts that incorporate affordable housing units<sup>1</sup>.
- b) Encourage and Promote Accessory Dwelling Units - Renew past efforts to incorporate accessory dwelling units in the city's zoning regulations along with a public awareness and education program that demonstrates the benefits and their minimal impacts. The allowance of accessory dwelling units is a trend that has become popular in many communities to accommodate elderly parents or relatives, young adult family members or students in need of low-cost housing serving students.
- c) Relax/Reduce Residential Parking Standards - Allow greater variability in the parking requirements for multi-family units. In order to make units more affordable, it is necessary to allow flexibility in the number of parking spaces required, especially in projects with smaller units such as studio and one-bedroom units.

These actions should be implemented in consultation with the Home Builders Association of the Greater Pee Dee whose mission includes the statement that it *"is dedicated to quality and affordable housing."*

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<sup>1</sup>"Model ordinance for density bonus for affordable housing" <https://www.smartgrowthamerica.org/app/legacy/images/IH-model-ordinance-APA%20.pdf>

### **Impediment 3: A Disconnect Between Fair Housing Complaints and Perceived Housing Discrimination.**

A total of 11 fair housing complaints were filed with HUD between 2016-2020, but when compared to the community survey, there were responders who reported experiencing housing discrimination or stakeholders who reported clients having experienced housing discrimination. Fifty-one percent of stakeholders believe housing discrimination exists in your service area and the community survey reports similar numbers (40%). This gap may indicate a lack of fair housing education or trust in the system for households. Further, it may also indicate a lack of understanding fair housing rights from professional lenders, landlords, or other real estate agents.

#### **Action 3.1 – Promote Fair Housing Education**

The city should work with fair housing stakeholders to further promote fair housing education to members of the community about their rights and the needs of groups that regularly face discrimination. One component is for the city to provide tenant information and adopt eviction assistance and prevention measures. It is recommended that Florence prepare materials to inform tenants of their tenant rights. Several cities around the country have instituted programs to address a growing number of housing evictions in their communities such as a landlord/tenant handbook. This type of handbook explains:

- Rights and responsibilities of both the landlord and the tenant;
- Guidelines for renters when entering into a new lease; and
- Information and resources on the eviction process<sup>2</sup>.

Further, the city should provide support for local organizations that advocate on behalf of groups that regularly face discrimination. Real estate professionals, lenders, and landlords can all benefit from fair housing education and affirmatively furthering fair housing promotion. Increased communication and working with local organizations and landlords can have multiple benefits of improving fair housing education and removing potential barriers to unlawful discrimination.

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<sup>2</sup>Longmont Landlord/Tenant Handbook

## Affordable Housing Related Impediments

### **Impediment 4: There is a High Percentage of Cost Burdened Renters.**

Over 50% of renters are cost burdened and approximately 41% of renters pay 35% or more of their income to housing costs (severely cost burdened). Nominally, rental rates have increased by over 25% since 2010, compared to the median household income rate increase of 16.5%. Even when adjusted for inflation, the estimated cost burdened totals have grown in significance since 2010 as the city’s median rental rate has increased from \$724 to \$780 per month (7.7% rate increase) compared to the rate of the median household income decreasing by 1.5% since 2010. While these estimates are not exact, the trends highlight an increase in housing costs to the average renter in the city. Consequently, renters who are more cost burdened contribute to housing instability and are less able to transition into home ownership and achieve greater residential stability.

*Table: Florence Median Rent vs. Median Household Income 2010 – 2019*

Year	Nominal		Adjusted for Inflation (2019)	
	Median Housing Income	Monthly Median Rental Rate	Median Housing Income	Monthly Median Rental Rate
2010	\$42,500	\$623	\$50,262	\$724
2019	\$49,525	\$780	\$49,525	\$780
Percent Change 2010 – 2019	16.5%	25.2%	-1.5%	7.7%

Source: 2006-2010, 2015-2019 ACS 5-Yr Estimates (DP03 and DP04)

### **Action 4.1 – Utilize Financial and Regulatory Incentives to Promote and Stimulate the Construction of Affordable Housing Units.**

The city should consider added incentives for developers, institutions, and not-for-profits to construct affordable housing units. By expanding and incentivizing the development of rental housing, the city can help provide people with more housing options that are affordable; meet the changing preferences of aging residents and younger workers and families; and provide more opportunities for people to age in place. New housing will also serve to offset the city’s jobs/housing imbalance in which 85% of Florence’s workers live outside the city. Affordable housing development incentives can include:

- a. Offer density bonuses tied to the amount of affordable housing units.
- b. Increase height of multi-family residential buildings.
- c. Increase residential lot coverage, including accessory dwelling units.
- d. Relax minimum parking requirements for multi-family buildings.
- e. Provide fast-track permitting and inspection for infill housing or home renovations.
- f. Use tax increment financing (TIF) to include residential property acquisition.
- g. Expand the utility incentive program to include:

- i. Waive municipal solid waste charges for a period of time upon occupancy for new affordable housing units similar to waiving commercial municipal solid waste charges for new downtown development.
- ii. Reduce water and sewer connection fees (physical tap and unit contributory loading fees)<sup>3</sup>.

#### Secondary Action 4.1

- Continue to support and encourage the rehabilitation of the existing housing stock in the City so it becomes decent, safe rental housing that is affordable to all lower income renters

#### Secondary Action 4.2

- Explore opportunities for economic investment and job training to address those confronted with housing cost-burden issues.

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<sup>3</sup>City of Florence Residential Development Review Fees 2019

**Impediment 5: Home Buying is Becoming Out-of-Reach as Households Experience Declining Purchasing Power.**

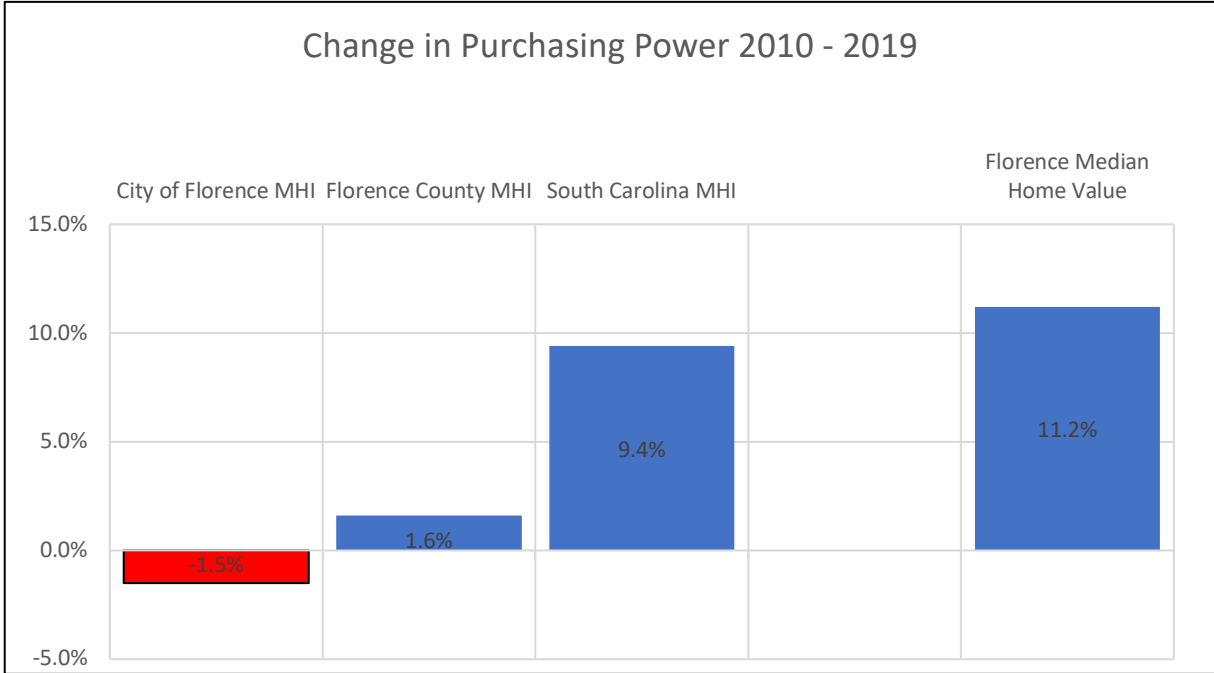
Since 2010, the purchasing power of Florence’s households has decreased by 1.5% for a household earning the median household income (MHI). The countywide purchasing power increased slightly, but to a lesser degree than those in the state. Statewide, by comparison, the purchasing power has increased for households earning the MHI by over 9%. This income stagnation alludes to slower economic growth in the city than the state or county, and a declining ability for residents to purchase and maintain the city’s housing stock as the median home value increase by 11.2% since 2010 from \$142,600 to \$158,600 in 2019. Newly constructed homes in Florence are valued even higher than the median home value.

*Table: Purchasing Power (Median Household Income)*

	2010	2019	Change in Purchasing Power
Florence (City)	\$50,262	\$49,525	-1.5%
Florence (County)	\$46,313	\$47,058	+1.6%
South Carolina	\$48,616	\$53,199	+9.4%

Source: 2006-2010 (adjusted for inflation), 2015-2019 ACS 5-Yr Estimates (DP03)

*Graph: Change in Purchasing Power*



Source: U.S. Census.

**Action 5.1 – Establish and Promote an Employee Housing Assistance Program.**

Employee housing assistance programs enable larger public, private, and nonprofit employers to strengthen and stabilize their work forces. Nationwide, the scope of employee housing programs varies. Many communities enlist larger employers, including school districts, to assist with housing mechanisms

as a benefit to support the company or institutions’ workforce. The City currently targets large employers to promote our Homebuyers Education Workshops and Homebuying Assistance Programs.

This program should be implemented with the cooperation and active participation of the members of the Florence County Economic Development Partnership. Since employers have differing employee recruitment and retention issues, the strategies and practices can be tailored to meet the needs of each employer. For example, because of the strong demand for police officers, many municipal police departments across the nation have implemented employee housing assistance programs such as no-interest loans, housing allowances and grants.

This program can include working with officials of Florence’s medical and educational institutions for the consideration of rental housing developments to accommodate transient or short-term medical staff and faculty residencies. Because of the size of their workforces, with buildings often being located on larger parcels of land and having more financial capabilities, major employers are the most suitable entities to offer this program.

There are 46 employers in Florence County with 250 or more employees that are most likely to benefit the most from an employee housing assistance program. These employers reported having 28,945 employees representing 48.9% of the county’s workforce in 2019, according to the South Carolina Department of Employment and Workforce.

*Table: Florence County Employers and Employment by Size of Establishment 2019*

<b>Florence County Employers by Size</b>	<b>Number of Employers</b>	<b>Total Employees</b>
<b>Target Employer Housing Assistance Employers Groups:</b>		
250 to 499 employees	25	8,056
500 to 999 employees	15	9,902
<u>1000+ employees</u>	<u>6</u>	<u>10,987</u>
Sub-Total:	46	28,945
Percent of Total:	1%	48.9%
<b>All Others: 249 employees or less</b>		
	4,410	59,089
<b>Total</b>	<b>4,486 employers</b>	<b>88,034 employees</b>

Source: South Carolina Department of Employment and Workforce 2019.

Reducing employee turnover and employee retention have direct and significant financial benefits for Florence’s employers by reducing the negative impacts of worker vacancy. Some of the important benefits associated with reducing employee turnover include the following:

1. Cost of recruitment of vacant positions.
2. Cost of retraining new hires.
3. Reduced productivity caused by employee turnover.
4. Increased employee overtime pay.

To support the private and institutional sectors in developing employee housing for Florence residents, it is recommended that the city offer zoning incentives to facilitate employee housing assistance programs.

Other incentives could include options ranging from waiving city permit fees to offering surplus city-owned land at a discount and other recommendations proposed in this action plan.

**Action 5.2 – Participate and Promote the Federal Teacher Next Door Program.**

The national Teacher Next Door program offers cities the opportunity to purchase certain HUD financed homes. Prospective buyers can receive grants up to \$4,170, closing cost and down payment assistance up to \$10,681, as well as discount on title fees<sup>4</sup>. The program is targeted to serve teachers and their families and other public service professionals, including nurses and healthcare employees, law enforcement and staff, firefighters, EMT's, military and government employees. This housing program should be added to the city's "toolbox" and publicized through the city and school district web sites and other public information outlets. In 2021, Florence County reports that there are 259 HUD foreclosure listings available with 114 of those reported being within the City of Florence<sup>5</sup>.

In conclusion, implementation of these actions will support the affordable housing needs in the City of Florence and expand the amount of affordable housing and further fair housing practices.

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<sup>4</sup>[www.teachernextdoor.us/home](http://www.teachernextdoor.us/home)

<sup>5</sup> [www.hud.com/hud-homes/florence-county-sc/](http://www.hud.com/hud-homes/florence-county-sc/)

### **Impediment 6: The Poverty Rate is Growing.**

In Florence, the poverty rate has increased from 17.3% to 18.5% between 2010 and 2018. This increase differs from the state of South Carolina where the poverty rate has declined. Consequently, the purchasing power for housing and other necessities for local residents has decreased. Furthermore, the overall poverty level in the city is lower than the state poverty rate for White residents but higher for Black or African American residents. Black or African American residents have a poverty rate that is over 40% higher than White residents.

#### **Action 6.1 – Increase Opportunity for Low-Income Households**

Review the City’s First-time Homebuyers Program and explore methods to expand the reach of this program as well as the available funding. Down payment assistance for first-time buyers can help reduce intergenerational wealth disparities and overcome historic lack of access to homeownership. Reviewing the eligibility requirement, promotional efforts, and funding sources could help expand the program and provide more assistance to low-income households. Leverage state programs that can provide resources toward this action. Given the limitations on CDBG public service funding, review strategic CDBG allocations in order to maximize contribution to the program.

##### **Secondary Action 6.1**

- Provide and promote financial literacy courses and homebuyer education courses using city-approved counselors. Ensure training is marketed to individuals most in need of assistance.

##### **Secondary Action 6.2**

- Explore opportunities for economic investment and job training to address those confronted with poverty.



**Impediment 7: Significant Income Inequality Between Race or Ethnicity.**

In Florence, race or ethnicity are closely correlated with household income. Black or African American households earn significantly less than any other racial or ethnic group in Florence. Understanding the relationship between race, ethnicity, and economic opportunities is important. When an area has a large minority population with a low MHI, it is possible that area meets HUDs definition of a Racially/Ethnically Concentrated Area of Poverty (R/ECAP). These areas are a top priority to address need to be a meaningful component in the allocation of public housing funds and economic development strategies, as well as other public policies and programs, wherever and whenever possible.

**Action 7.1 – Address Disproportionate Economic Barriers**

Target opportunities for economic investment and job training to address racial/ethnic minority households confronted with disproportionate poverty. Prioritizing economic development activities such as businesses lending or gap financing through various local and state loan programs to small businesses will help to create or retain jobs and help establish minority business ownership. Expand support for partnerships that enhance entrepreneurship and small business development, expansion, and retention within impacted areas and minority neighborhoods.

**Impediment 8: There is an Increasing Level of Housing Instability Leading to Higher Rates of Renter Evictions and Risk of Homelessness.**

Inadequate access to supportive services, rent relief, and affordable housing opportunities increases housing instability and risk of homelessness. The impacts from the COVID-19 pandemic has exacerbated existing inequalities and vulnerabilities and without continued rental assistance, levels of evictions will likely increase.

The state reported 184 homeless persons in Florence County, the 7<sup>th</sup> highest county within South Carolina according to the [2020 South Carolina State of Homelessness Report Update](#)<sup>6</sup>. The City has partnered with organizations like The Eastern Carolina Housing Organization (ECHO), The Salvation Army, Manna House, House of Hope, and Lighthouse Ministries to work together to support needs of the city's homeless population. The City formed the "Mayor's Coalition" which helped develop a program called No One Unsheltered - a partnership of all shelter organizations in Florence to address the homeless situation. This partnership encourages all service providers to communicate with each other daily and nightly to provide services needed by low income and homeless persons and to leave no - one unsheltered nightly.

Florence had the second highest number of eviction filings of all larger municipalities in South Carolina in 2019 according to the [South Carolina Housing Needs Assessment Update 2021](#)<sup>7</sup>. This update states that "South Carolina policies are well outside the norm when it comes to landlord-tenant relations. In particular, the state's low filing fee of \$40 for an eviction case makes it possible to use the eviction process as a means of leveraging fear of losing their home as a means of maximizing revenue." The Housing Needs Assessment Update 2021 further states that *"even if an eviction filing does not result in removal, the housing instability caused by the threat of losing one's home can still cause substantial adverse consequences."*

**Action 8.1 – Promote Housing Solutions and Eviction Protection Strategies.**

Continue promote protections from evictions, housing solutions for those experiencing homelessness, and prevention of further foreclosure and evictions. Provide financial assistance in the form of development subsidies so low-income households that are cost overburdened, particularly those households that are below HUD's Very Low-Income definition so they are able to afford decent, safe, and sound housing. Encourage supportive housing efforts and new developments. Sustaining local emergency housing funds that support a variety of rental subsidies and assistance to households at risk of eviction will help prevent cycles of homelessness due to temporary financial shocks.

**Action 8.2 – Leverage Public Land and Funding to Develop Affordable Housing.**

The city should inventory and offer discounted public lands to affordable housing developers. This may also include continued acquisition of additional land for the provision of affordable housing.

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<sup>6</sup>2020 South Carolina State of Homelessness Report

<sup>7</sup>South Carolina Housing Needs Assessment 2021 Update

## Appendix

## Federal Fair Housing Laws

Federal laws provide the backbone for U.S. fair housing regulations. A brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

*Fair Housing Act Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)*, as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).

*Title VIII was amended in 1988 (effective March 12, 1989) by the Fair Housing Amendments Act.* In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.

*Title VI of the Civil Rights Act of 1964.* Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

*Section 504 of the Rehabilitation Act of 1973.* Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

*Section 109 of the Housing and Community Development Act of 1974.* Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

*Title II of the Americans with Disabilities Act of 1990.* Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

*Architectural Barriers Act of 1968.* The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

*Age Discrimination Act of 1975.* The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

*Title IX of the Education Amendments Act of 1972.* Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

## Fair Housing Related Presidential Executive Orders

*Executive Order 11063.* Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

*Executive Order 11246.* Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

*Executive Order 12892.* Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

*Executive Order 12898.* Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

*Executive Order 13166.* Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

*Executive Order 13217.* Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

## HMDA Data Tables – Local Lenders

Home Mortgage Disclosure Act (HMDA) data was pulled from the Federal Financial Institutions Examination Council (FFIEC). Non-regional lenders are not listed in the below tables. Data notes: the balance of the applications that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant. Financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan.

Table: Florence MSA Lenders - Total Applications (Home Purchase, Refinance, and Home Improvement)

Institution	Overall			
	Total Applications	Total Originations	Total Denials	Overall Denial Rate
Anderson Brothers Bank	25	25	0	0%
Carolina Bank & Trust	63	38	9	14.3%
Citizens Bank	38	23	3	7.9%
Dedicated Community Bank	7	7	0	0%
Fairway Mortgage	295	137	27	9.2%
Finance of America Mortgage	304	146	78	25.7%
First Bank	45	28	9	20%
First Citizens Bank	167	91	57	34.1%
First Reliance Bank	236	142	30	12.7%
Guaranteed Rate	233	133	18	7.7%
Movement Mortgage	91	52	9	9.9%
PNC Bank	60	19	21	35%
Safe Federal Credit Union	59	10	30	50.8%
Sharonview Federal Credit Union	36	14	18	50%
South Carolina Federal Credit Union	27	9	0	0%
South State Bank	221	83	48	21.7%
SPC Credit Union	13	5	3	23.1%
State Credit Union	28	5	15	53.6%
Synovus Bank	17	5	6	35.3%
TD Bank	41	7	18	43.9%
Truist Bank (formerly BB&T)	277	88	69	24.9%
Wells Fargo	632	73	141	22.3%

Table: Florence MSA Lenders - Home Purchase Applications, Originations, and Denials

Institution	Home Purchase			
	HP Applications	HP Originations	HP Denials	HP Denial Rate
Anderson Brothers Bank	19	19	0	0%
Carolina Bank & Trust	43	25	6	14%
Citizens Bank	13	13	0	0%
Dedicated Community Bank	5	5	0	0%
Fairway Mortgage	260	132	21	8.1%
Finance of America Mortgage	274	134	69	25.2%
First Bank	25	18	3	12%
First Citizens Bank	63	36	18	28.6%
First Reliance Bank	189	104	21	11.1%
Guaranteed Rate	213	121	18	8.5%
Movement Mortgage	80	50	9	11.3%
PNC Bank	12	8	0	0%
Safe Federal Credit Union	13	3	6	46.2%
Sharonview Federal Credit Union	19	8	9	47.4%
South Carolina Federal Credit Union	14	6	0	0%
South State Bank	115	35	21	18.3%
SPC Credit Union	4	4	0	0%
State Credit Union	9	1	0	0%
Synovus Bank	7	2	3	42.9%
TD Bank	25	7	6	24%
Truist Bank (formerly BB&T)	119	34	15	12.6%
Wells Fargo	206	42	18	8.7%



Table: Florence MSA Lenders - Refinance Applications, Originations, and Denials

Institution	Refinance			
	Refi Applications	Refi Originations	Refi Denials	Refi Denial Rate
Anderson Brothers Bank	6	6	0	0%
Carolina Bank & Trust	18	11	3	16.7%
Citizens Bank	21	10	3	14.3%
Dedicated Community Bank	2	2	0	0%
Fairway Mortgage	27	4	3	11.1%
Finance of America Mortgage	3	3	0	0%
First Bank	8	4	0	0%
First Citizens Bank	35	20	15	42.9%
First Reliance Bank	33	24	9	27.3%
Guaranteed Rate	12	4	0	0%
Movement Mortgage	5	1	0	0%
PNC Bank	23	6	6	26.1%
Safe Federal Credit Union	2	0	0	0%
Sharonview Federal Credit Union	6	1	3	50%
South Carolina Federal Credit Union	0	0	0	0%
South State Bank	37	22	9	24.3%
SPC Credit Union	9	1	3	33.3%
State Credit Union	6	3	3	50%
Synovus Bank	5	1	0	0%
TD Bank	3	0	3	100%
Truist Bank (formerly BB&T)	63	28	3	4.8%
Wells Fargo	65	7	21	32.3%

Table: Florence MSA Lenders - Home Improvement Applications, Originations, and Denials

Institution	Home Improvement			
	HI Applications	HI Originations	HI Denials	HI Denial Rate
Anderson Brothers Bank	0	0	0	0%
Carolina Bank & Trust	2	2	0	0%
Citizens Bank	0	0	0	0%
Dedicated Community Bank	0	0	0	0%
Fairway Mortgage	0	0	0	0%
Finance of America Mortgage	0	0	0	0%
First Bank	0	0	0	0%
First Citizens Bank	10	8	0	0%
First Reliance Bank	1	1	0	0%
Guaranteed Rate	0	0	0	0%
Movement Mortgage	0	0	0	0%
PNC Bank	18	4	9	50%
Safe Federal Credit Union	21	0	12	57.1%
Sharonview Federal Credit Union	0	0	0	0%
South Carolina Federal Credit Union	2	0	0	0%
South State Bank	32	14	12	37.5%
SPC Credit Union	0	0	0	0%
State Credit Union	3	0	3	100%
Synovus Bank	2	2	0	0%
TD Bank	6	0	6	100%
Truist Bank (formerly BB&T)	0	0	0	0%
Wells Fargo	71	8	45	63.4%

Table: Florence MSA Lenders - Denials by Race or Ethnicity

Institution	Denials by Race/Ethnicity				Denial Rate by Race/Ethnicity			
	White	Black	Hispanic	Asian	White	Black	Hispanic	Asian
Anderson Brothers Bank	0	0	0	0	0%	0%	0%	0%
Carolina Bank & Trust	6	3	0	0	13.3%	100%	0%	0%
Citizens Bank	3	0	0	0	10.7%	0%	0%	0%
Dedicated Community Bank	0	0	0	0	0%	0%	0%	0%
Fairway Mortgage	9	12	0	0	9.1%	7.7%	0%	0%
Finance of America Mortgage	27	42	0	0	23.9%	34.7%	0%	0%
First Bank	3	0	3	3	10.3%	0%	75%	60%
First Citizens Bank	33	3	0	12	27%	25%	0%	60%
First Reliance Bank	24	3	3	0	14.7%	8.6%	27.3%	0%
Guaranteed Rate	3	6	6	0	2.4%	14.3%	46.2%	0%
Movement Mortgage	9	0	0	0	14.1%	0%	0%	0%
PNC Bank	9	9	0	0	25%	100%	0%	0%
Safe Federal Credit Union	15	12	0	0	37.5%	75%	0%	0%
Sharonview Federal Credit Union	6	9	0	0	27.3%	90%	0%	0%
South Carolina Federal Credit Union	0	0	0	0	0%	0%	0%	0%
South State Bank	27	9	0	6	21.6%	25%	0%	75%
SPC Credit Union	0	3	0	0	0%	37.5%	0%	0%
State Credit Union	9	3	0	0	69.2%	25%	0%	0%
Synovus Bank	3	3	0	0	100%	100%	0%	0%
TD Bank	6	3	0	3	50%	75%	0%	100%
Truist Bank (formerly BB&T)	0	0	0	0	0%	0%	0%	0%
Wells Fargo	54	60	6	9	19.2%	48%	54.5%	69.2%

Table: Florence MSA Lenders – Reasons for Denials

Institution	Debt-to-Income Ratio	Credit History	Lack of Collateral	Credit Application Incomplete	Other
Anderson Brothers Bank	N/A	N/A	N/A	N/A	N/A
Carolina Bank & Trust	0%	0%	0%	0%	100%
Citizens Bank	0%	0%	0%	0%	100%
Dedicated Community Bank	N/A	N/A	N/A	N/A	N/A
Fairway Mortgage	22.2%	77.8%	0%	0%	0%
Finance of America Mortgage	15.4%	7.7%	15.4%	0%	61.5%
First Bank	33.3%	0%	66.7%	0%	0%
First Citizens Bank	42.1%	31.6%	10.5%	0%	15.8%
First Reliance Bank	20%	10%	10%	10%	50%
Guaranteed Rate	33.3%	33.3%	16.7%	0%	16.7%
Movement Mortgage	66.7%	0%	0%	33.3%	0%
PNC Bank	0%	100%	0%	0%	0%
Safe Federal Credit Union	0%	0%	0%	0%	100%
Sharonview Federal Credit Union	83.3%	16.7%	0%	0%	0%
South Carolina Federal Credit Union	N/A	N/A	N/A	N/A	N/A
South State Bank	18.8%	50%	6.3%	12.5%	12.5%
SPC Credit Union	0%	100%	0%	0%	0%
State Credit Union	60%	20%	20%	0%	0%
Synovus Bank	0%	50%	50%	0%	0%
TD Bank	16.7%	50%	16.7%	0%	16.7%
Truist Bank (formerly BB&T)	26.1%	52.2%	8.7%	0%	13%
Wells Fargo	17%	38.3%	6.4%	6.4%	31.9%