

CITY OF MELBOURNE
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING, 2005
UPDATED FEBRUARY 2006

I. Introduction

This report has been prepared for the City of Melbourne in accordance with the Consolidated Plan Regulations (24 CFR 91) that require an Analysis of Impediments to Fair Housing Choice be prepared by each United States Department of Housing and Urban Development Entitlement jurisdiction. It replaces the City of Melbourne's first Analysis of Impediments completed in 1996. Initially prepared in November 2003, the document remained in draft form until June 2005 at which time it was reviewed and select data was updated concurrent with the development of the 2005-2010 Brevard County HOME Consortium Consolidated Plan. Final revisions were made in February 2006.

HUD defines "impediments to housing choice" as:

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

These persons are often referred to as protected classes.

As a condition of receiving Community Development Block Grant (CDBG) funds or HOME Investment Partnership (HOME) funds, entitlement jurisdictions must certify that they will "affirmatively further fair housing". In order to affirmatively further fair housing, entitlement jurisdictions must take the following actions:

- Conduct and analysis of Impediments to Fair Housing Choice
- Take appropriate actions to overcome the effects of impediments identified in the analysis.
- Maintain records reflecting the analysis and actions.

The Analysis of Impediments is a review of the impediments to fair housing choice in the public and private sector which involves:

- A review of an entitlement jurisdiction's (in this case Melbourne's) laws, regulations, administrative policies, procedures, and practices.
- An assessment of how those laws, etc. affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, affecting fair housing choice.

Entitlement jurisdictions are encouraged to be mindful of instances of “disparate impact”. Disparate impact means that an entity’s policies and procedures in providing housing related services, even if neutral and with no intent to discriminate could constitute a violation of fair housing laws if they negatively impact protected classes.

A. Brief Overview of Fair Housing

In 1968, the United States Congress passed Title VIII of the Civil Rights Act, known as the Fair Housing Act, prohibiting discrimination in the sale, rental, and financing of dwellings based on race, color, religion, sex, and national origin. In 1988, Congress passed the Fair Housing Amendments Act, which expanded the coverage of Title VIII and also prohibited discrimination on the basis of disability and familial status. The Florida Fair Housing Act was adopted in 1983 and updated to conform to the 1988 federal Fair Housing Amendments Act in 1989. At the local level, the City of Melbourne passed its Housing Discrimination Ordinance (Ordinance # 98-33) in 1998. The U. S. Department of Housing and Urban Development is obligated to uphold the federal Fair Housing Act, as are recipients of HUD funds.

B. Purpose and Methodology

The purpose of the Analysis of Impediments to Fair Housing Choice is to determine the status of fair housing programs, services, and activities in the City of Melbourne, to identify fair housing concerns and needs in both the public and private sectors, examine the nature, extent, and causes of fair housing problems, and create a plan to address these issues. The recommended action items are not mandates but suggested activities to serve as a tool to affirmatively further fair housing.

Data was compiled and an analysis was performed with special regard to race and ethnicity, persons with disabilities, and familial status as they relate to income level and affordable housing issues. The protected classes of race, disability, and familial status most often face housing discrimination. Data came from a broad range of sources including Census 2000, the Melbourne Area Association of Realtors, the Fair Housing Continuum, the Chamber of Commerce, the U. S. Bureau of Labor Statistics, the University of Florida’s Shimberg Center for Affordable Housing, the Public Housing Authority, assisted housing agencies, and other Melbourne area non-profit organizations. Housing and Community Development Staff analyzed the data and compiled the report based on the accumulated information.

II. Background Data

A. Demographic Data

According to Census 2000, the City of Melbourne had a population of 71,371, which constitutes a 26.4% increase from the 1990 census count of 56,464 persons. Melbourne’s racial composition is 84.3% white, 8.9% black or African American, 0.5% American Indian, 2.2% Asian, and 1.0% other. Additionally, 3.1% of the population

reported to be a mix of two or more races. Census 2000 was the first census to differentiate between persons of Hispanic origin regardless of race. The number of persons of Hispanic or Latino origin is reported to be 3,807, or 5.3% of the total population.

Population by Race and Hispanic or Latino Ethnicity

Race	# of Persons	Percentage by Race	# of Persons of Hispanic or Latino Origin by Race	% of Persons of Hispanic or Latino Origin by Race
White	60,192	84.3%	2,674	4.4%
Black/African American Alone	6,337	8.9%	147	2.3%
American Indian/Alaska Native	338	0.5%	0	0.0%
Asian Alone	1,574	2.2%	44	2.8%
Native Hawaiian/Other Pacific Islander	6	0.0%	0	0.0%
Other	742	1.0%	641	86.4%
Two or More Races	2,182	3.1%	301	13.8%
Total Population	71,371	100.0%	3,807	5.3%

Census 2000

The gender distribution is 48.6% male and 51.4% female. The majority of the population is between the ages of 18 and 65 with the median age being 39.8.

Population by Age & Gender

Age	Male	Female	Total	Age as % of Total Population
0-18 Years	7,624	7,134	14,758	20.68%
18-65 Years	21,358	21,421	42,779	59.94%
65 and Over	5,692	8,142	13,834	19.38%
Total	34,674	36,697	71,371	
Gender as % of Total Population	48.58%	51.42%		

Census 2000

There are 30,698 households within the City of Melbourne with 60.1% being family households and 39.9% being non-family households. Family households are comprised of 75.5% married couple families and 18.2% female-headed families. The median family size is 2.28 persons. The median household size is 2.22 persons. 26.8% of all households in the City, or 8,239 households, have individuals less than 18 years of age. 31.1% of all households, or 9,538 households have individuals that are 65 years or older.

Family and Non-family Household Characteristics

		# of Households	% of Total Family or Non-family	% of Total Households
Total Family Households		18,450	100.0%	60.1%
	<i>Married Couple Family</i>	13,934	75.5%	45.4%
	<i>Female Head of Household</i>	3,351	18.2%	10.9%
	<i>Other</i>	1,165	6.3%	3.8%
Total Non-family Households		12,248	100.0%	39.9%
	<i>Male Householder Living Alone</i>	4,195	34.3%	13.7%
	<i>Female Householder Living Alone</i>	5,882	48.0%	19.2%
	<i>Other</i>	2,171	17.7%	7.1%
Total Households		30,698		100.0%

Census 2000

According to Census 2000, disabled non-institutionalized persons who are 5 years and older, comprise 22.1% of the population in the City of Melbourne. There are 1,451 institutionalized individuals in the City. These individuals make up 2.0% of the population.

Disability Status by Age and Gender for the Civilian, Non-institutionalized Population 5 Years and Over

Age	Male	Female	Total
5 to 15 years	507	225	732
16 to 20 years	532	376	908
21 to 64 years	4,346	4,294	8,640
65 to 74 years	1,161	1,178	2,339
75+ years	1,215	1,950	3,165
Totals	7,761	8,023	15,784

Census 2000

B. Income Data

Census 2000 reported that the median household income in the City of Melbourne was \$34,571. At the time this document was being written in September of 2003, the median area income in the Melbourne-Titusville-Palm Bay Metropolitan Statistical Area was \$53,500. The median MSA income is important as it is used to assess which households are considered low and very low-income households when determining if they qualify for assistance under HOME and CDBG Programs. Households making 51% to 80% of this median area income adjusted for family size are considered low-income. Households making 50% or less of the median area income adjusted for family size are regarded as very low-income households. Based on census data, an estimated 57% of households in the city of Melbourne are considered low-income, and 35% are very low-income.

In the City of Melbourne, Asians are the race with the highest median household income, followed by Whites. Blacks/African Americans have the lowest median household income of any race. The median income of males is higher than the median

income of females.

Median Income by Race, Ethnicity, and Gender

Race of Household	White	\$36,105
	Black/African American Alone	\$21,009
	American Indian/Alaska Native	\$22,198
	Asian Alone	\$41,008
	Native Hawaiian/Other Pacific Islander	N/A
	Other	\$25,795
	Two or More Races	\$26,447
Ethnicity of Household	Hispanic or Latino (any race)	\$31,492
Gender	Male	\$25,641
	Female	\$15,992

Census 2000

C. Employment Data

Census 2000 indicates that 47.5% of employed residents in the City of Melbourne are employed in the service industry, 18.3% in wholesale and retail trades, 14.3% in manufacturing, and the remainder in construction, finance, information, transportation, and agriculture, fishing, and mining. The major employers in and around the City of Melbourne are: Patrick Air Force Base, Harris Corporation, School Board of Brevard County, Health First, Inc., Brevard County Board of County Commissioners, Brevard Community College, Northrop Grumman Melbourne Systems, Intersil Corporation, Rockwell Collins, Inc., Dictaphone, Florida Institute of Technology, Melbourne Internal Medicine Associates, and Cape Publications.

Unemployment in the City of Melbourne has increased in recent years as it has throughout the country. In July of 2003, the U.S. Bureau of Labor Statistics reported the unemployment rate in the city to be at 5.6%, leaving approximately 1,894 persons without jobs. The unemployment rate was reported to be at 5.5% in state of Florida and 6.2% in the nation for that same month.

D. Housing Profile

The number of housing units in the City of Melbourne continues to grow as new housing units are added to its existing housing stock each year. According to Census 2000, there were a total of 33,678 housing units in the city. In the 1990's, 6,862 housing units were constructed increasing the total number of existing units by 25.6%. This is still a significant increase despite the fact that the 1980's saw a 50% increase in the number of housing units.

Age of Existing Housing Units

Year Built	All Housing Units		Occupied Units		
	Number of Existing Units	% of Total	Owner Occupied	Renter Occupied	% Owner Occupied by Year Built
1939 or before	618	1.8%	313	275	50.6%
1940 - 1949	463	1.4%	262	170	56.6%
1950 - 1959	4,215	12.5%	2,865	1,086	68.0%
1960 - 1969	6,241	18.5%	4,004	1,721	64.2%
1970 - 1979	5,678	16.9%	2,758	2,366	48.6%
1980 - 1989	9,601	28.5%	4,130	4,320	43.0%
1990 - 1999	6,862	20.4%	4,776	1,750	69.6%
All Years:	33,678	100.0%	19,108	11,688	56.7%

Census 2000

In 2000, the existing housing units were comprised of 57.0% single-family detached units, 36.1% multi family units, 6.5% mobile homes, and 0.3% other types of units including RVs and boats. The composition of housing units in the city has not shifted significantly since 1990 when the housing market was comprised of 57.6% single-family detached units, 34.9% multi family units, 6.8% mobile homes, and 0.7% other. In contrast to the City of Melbourne's housing market, Brevard County's housing market consists of 61.0% single-family detached units, 27.6% multi family units, 10.9% mobile homes, and 0.5% other types of housing.

Comparison of Housing Units Characteristics in the City of Melbourne, 1990 & 2000

Tenure	1990		2000	
	Units	% of Total Units	Units	% of Total Units
Detached	16,167	57.6%	19,209	57.0%
Attached	9,801	34.9%	12,157	36.1%
Mobile Home	1,903	6.8%	2,197	6.5%
Other - boat, RV, etc.	190	0.7%	115	0.3%
Total Units	28,061	100.0%	33,678	100.0%

Census 2000

Housing Units Characteristics in the City of Melbourne & Brevard County

Characteristics of Unit	City of Melbourne				Brevard County	
	Occupied	Vacant	Total	% of Total Units	Total	% of Total Units
Detached	18,264	945	19,209	57.0%	135,412	61.0%
Attached	10,909	1,248	12,157	36.1%	61,369	27.6%
Mobile Home	1,544	653	2,197	6.5%	24,092	10.8%
Other - boat, RV, etc.	79	36	115	0.3%	1,199	0.5%
Total Units	30,796	2,882	33,678	100.0%	222,072	100.0%

Census 2000

During the 1990's, the percent of owner occupied units decreased slightly from 58% in 1990 to 56.7% in 2000. By contrast 66.6% of the housing units in Brevard County are owner occupied. Despite this drop in owner occupancy, 69.6% of the new housing

units constructed in the 1990's are owner occupied units. Renter occupied units comprise 34.7% of the housing in Melbourne and 8.6% are vacant. Vacant units include those that are vacant for rent, vacant for sale, rented or sold but not yet occupied and seasonally occupied units. The 8.6% vacancy rate is a decrease from a vacancy rate of 10.7% in 1990. When the percentages were adjusted for seasonal vacancy, only 3.3% of housing units were vacant in 2000 compared to 7.5% in 1990.

Housing Units by Tenure

Tenure	Number of Units	% of Total Units	Median Household Income by Tenure
Owner Occupied	19,108	56.7%	\$41,528
Renter Occupied	11,688	34.7%	\$23,700
Vacant All	2,882	8.6%	
Vacant For Rent	1,106		
Vacant For Sale	425		
Rented/Sold Not Yet Occupied	263		
For Seasonal, Recreational Use	903		
For Migrant Workers	0		
Other	185		
Total:	33,678	100.0%	

Census 2000

According to Census Data, the median value of owner occupied units was \$80,300. Median household income of homeowners was \$41,528. Households in owner occupied units spend an average of 18.2% of their income on their mortgage and associated costs (including insurance, taxes, interest, utilities, and homeowner association fees). Only 21.0% of homeowner households spend 30% or more of their income on mortgage and 6.5% spend 50% or more of their income on their mortgage and associated costs.

In the City of Melbourne, renters are more likely to be cost burdened than owners. The median rent is \$518 and the median household income of renters is \$23,700. Renters spend an average of 27% of their household income on rent. This is below the 30% benchmark. Despite this encouraging statistic, 41% of renter occupied households spend an excess of 30% of their income on rent.

The median value of owner occupied units differs greatly when viewed in terms of race and ethnicity. Asians have the highest housing unit values in the city with the median value being \$107,100. Blacks/African Americans have the lowest median home value.

Median Value of Owner Occupied Units by Race and Hispanic or Latino Origin of Householder

Race or Ethnicity	Median Value
All Occupied Units	\$80,300
White Only	\$86,500
Black/African American Alone	\$56,400
American Indian/Alaska Native	\$60,900
Asian Alone	\$107,100
Native Hawaiian/Other Pacific Islander	N/A
Other	\$87,700
Two or More Races	\$97,500
Hispanic or Latino (any Race)	\$84,000

Census 2000

Public Housing & Permanent Affordable Rental Housing - Within the City of Melbourne, public housing and affordable rental housing that has received some form of public assistance constitutes approximately 20% of the renter occupied housing units in the city. The public housing within the city is owned and managed by either the Melbourne Housing Authority or the Brevard County Housing Authority. The two entities operate 463 housing units in or in close proximity to the City of Melbourne. No public housing has been built in Melbourne since 1985, but existing units are maintained and periodically rehabilitated.

The public housing inventory is expected to significantly change by 2007. In May 2005, the Melbourne Housing Authority sold its largest complex, Ramshur Towers, a 101-unit, eleven-story apartment complex serving the elderly and persons with disabilities. The cost of bringing this 1970 complex in line with current housing standards (e.g. ADA compliance) with available maintenance and modernization funds, combined with a growing need for assisted living housing amenities for Melbourne's extremely low- and low-income elderly and persons with disabilities made rehabilitation infeasible. With Section 8 vouchers available to current Ramshur Tower residents, construction of two separate developments is anticipated to commence in 2006. While physically located in Palm Bay, the complexes are adjacent to the Melbourne-Palm Bay city limit, making them a convenient location for residents of both cities, and close to hospitals, shopping and public transportation routes. At build-out, Silver Sands will serve 560 elderly households in one-bedroom units and will include 42 additional 2-bedroom, single family homes. All units will be ADA compliant and will include community based services. Silver Palms will serve the needs of the non-elderly disabled community with one residential building consisting of 30 one-bedroom units. Once again, community based services will be provided. Hence, available units to meet the needs of Melbourne's poorest, most vulnerable populations – the elderly and persons with disabilities – will multiply nearly six-fold.

Public Housing Operated by the Melbourne Housing Authority

Property	Location	Elderly Units	Family Units	Total # of Units
Booker Heights	Wall, S. Walker, Reddick & Roberts Sts., 32901	16	38	54
Elliott Newell Court	1506-1512 University Blvd., 905 & 909 Hickory St., 32901	2	28	30
Ramshur Towers	Houston St., 32935	101	0	101
Temple Terrace	Temple St., 32935	0	45	45
Tucker Heights	1101 & 1103 Mathers St.; 1780 Steele St., 32935	0	21	21
Twin Oaks	Mitchell Street, 32901	10	0	10
	TOTAL:	129	132	261

Brevard County Family of Housing Authorities, July 1997

Public Housing Operated by the Brevard County Housing Authority within or in Close Proximity to the City of Melbourne

Property	Location	Elderly Units	Family Units	Total # of Units
Arthur Circle*	Arthur Circle & White Rd., 32934	0	50	50
Garden Apts.	S. Patrick Dr., 32903	100	0	100
George Hopkins	Monroe St., 32901	0	28	28
Tucker Heights	Mathers & McClendon Sts., 32935	0	24	24
"Powell's Subdivision"	Monroe, Randolph & Saxon Sts., 32901	0	50	50
	TOTAL	100	152	252

**Outside city limits, but close proximity to Melbourne (total 150 units)
Brevard County Family of Housing Authorities, July 1997*

Other forms of permanent affordable rental housing have been built or existing units have been rehabilitated and made affordable to low-income households. These units have been "set-aside" as affordable to low-income tenants in exchange for an infusion of Federal, State, and/or local government funding during construction or rehabilitation of the units.

Permanent Affordable Housing Units Located in the City of Melbourne, 2005

Name of Complex (*Denotes Elderly Housing)	Number of Bedrooms				Unit Total	Assisted Unit Total
	0	1	2	3		
Arch Creek Run	0	52	37	7	96	96
Ascension Manor*	0	76	0	0	76	76
Briarstone Apartments	0	0	0	14	14	14
Circle Avenue 19, 23, 28, 30-36	0	0	21	0	21	21
Crane Creek Senior Housing*	0	84	43	0	127	115
Granada Bay	0	80	80	0	160	160
Hampton Greens	0	52	124	40	216	215
Haven of Rest	0	20	20	0	40	40
Hickory Pointe*	0	108	108	0	216	216
Palm Harbor Villas	0	86	28	0	114	114
Sabal Palms	0	0	0	72	72	72
Shull Manor	0	0	65	0	65	65
The Harbor Apartments	0	85	77	0	162	32
The Park Apartments	0	24	84	12	120	6
Trinity Towers East*	51	105	0	0	156	156
Trinity Towers West*	64	128	0	0	192	192
Trinity Towers South*	132	30	0	0	162	162
Willow Brook Village	0	0	24	32	56	56
Windover Health Club	0	64	156	16	236	47
Total:	247	436	406	132	2,301	1,855

Housing & Community Development Department June 2005

Wickham Club Apartments opened in the spring 2005 with 132 units, but The Park Apartments may lose its six (6) set-aside units.

Some of the affordable rental housing caters to special needs groups such as the elderly or persons with disabilities. The Association of Retarded Citizens owns and operates a group home in Melbourne that serves 5 persons with disabilities, and the Melbourne Housing Authority has plans to construct 30 one-bedroom units to serve the needs of the non-elderly disabled community in the near future. Abilities of Florida, Inc., a non-profit organization organized in 1959 with the purpose of assisting persons with disabilities, owns and manages nine (9) one- and two-bedroom units affordable to low/moderate persons with disabilities, located at San Juan Village Condominium complex in Melbourne, and has plans to purchase and rehabilitate at least seven (7) more.

Assisted Living - In the City of Melbourne, there are a number of housing facilities that operate to meet the needs of the elderly and disabled. These facilities are licensed by the Florida Department of Health and Human Services or the Florida Department of Children and Families. The facilities include nursing homes, assisted living homes, and community residential homes.

**Nursing Homes, Assisted Living Facilities, and Community Residential Homes
Licensed with the State of Florida, 2003**

	Name	Address	Number of Beds
Nursing Homes	Avante at Melbourne, Inc.	1420 S. Oak Street	110
	Carnegie Gardens Nursing Center	1415 S. Hickory St.	138
	Life Care Center of Melbourne	606 E. Sheridan Rd.	120
	Mariner Health of Melbourne	251 Florida Ave.	120
	Mariner Healthcare of Atlantic Shores	4251 Stack Blvd.	120
	Tandem Healthcare of Melbourne	3033 Sarno Rd.	167
Total # of Beds in Nursing Homes:			775
Assisted Living Facilities (ALF)	Catalina Gardens	85 Bulldog Blvd.	125
	Century Oaks	4001 Stack Blvd.	25
	Fountains of Melbourne	4451 Stack Blvd.	55
	Hibiscus Court	540 E. Hibiscus Blvd.	78
	Quality Lifestyles - Whispering Oaks*	4060 Miami Street	6
	Quality Lifestyles - Pinetrees*	2155 Keystone Ave.	9
	Southland Suites of Melbourne	2680 Croton Rd.	80
	Village Oaks at Melbourne	1765 W. Hibiscus	102
Total # of Beds in Assisted Living Facilities:			480
Community Residential Homes	Association of Retarded Citizens - Sherwood Estates	2452 St. Swithin Ln.	6
	Independent Group Home Living (IGHL)	629 Cornell Ave.	6
	Oram Group Home	809 Camellia Ct.	4
Total # of Beds in Group Homes:			16
Total # of Beds All:			1,271
Licenses Pending - Community Residential Homes		2150 Warwick Rd	2
		505 Camilla Dr.	2
		408 Iris La.	2
Total # of Beds (Pending):			6

* Outside the City, but accessible to city residents

Source: Florida Department of Health & Human Services' Agency for Health Care Administration, Association of Retarded Citizens, 211-Brevard, Florida Department of Children & Families, 2003

Emergency and Transitional Shelter - Emergency shelters and transitional housing facilities provide an array of services to support the needs and improve the welfare of the homeless or those at risk of becoming homeless including very low-income households, domestic violence victims, and runaway youths. Based on a point in time count done in January 2003, the number of homeless persons in Brevard County on any given night was estimated at 1,981 persons. The January 2005 point-in-time count revealed a lower number of 1,517. However, local providers of services and/or housing to the homeless believe that number is artificially low, and that many homeless who fled inland during the hurricanes of 2004 have returned to the area since the January count was completed.

Emergency & Transitional Shelter Capacity – Melbourne Area, 2005			
Agency/Address	Facility Type	Population Served	Maximum Capacity
Christ is the Answer Mission (CITA) 2300 Harbor City Blvd., 32901	Emergency	General Population (Men Only)	67 Men
Coalition for the Hungry & Homeless 709 Columbus Ave. 32901 (2 units) 709 E. Fee Ave, 32901 (2 units) 1895 Garner Ave., 32935 (1 unit) Herring St., 32901 (1 unit) 19 Nelson Ave, 32935 (4 units)^	Transitional	General Population	10 Families
Genesis House 2108 S. Waverly Pl. and 814 E. Melbourne Ave., 32901	Transitional	Pregnant teens; single women w/children	7 Women; 24 Women w/children
Hacienda Girls Ranch ~ Jimmie Smith Cottage 330 Croton Rd., 32901	Transitional	Transitional/Semi- independent Living for Girls in Foster Care	8 Teenage Women (ages 16-18)
Resurrection Ranch Ministries* 5925 Old Dixie Hwy., 32940	Transitional	General Population	35 Individuals; 3 Families w/children
Sally's House* Address Confidential	Transitional	Women	15 women w/children
Salvation Army Emergency Shelter 1080 Hickory St., 32901	Emergency	General Population (Women Only)	48 Women w/children
Tabernacle Church "Jewel House" 2322 Lipscomb St., 32901	Transitional	General Population (Women Only)	6 Women w/children
Veterans Transitional Facility 701, 703, 705 Columbus Ave., 32901 (6 units) 700, 704 E. Fee Ave., 32901 (4 units)	Transitional	Veterans	20 Persons
Women's Center 1605, 1607, 1609, 1611, 1613 Elizabeth St., 32901 (5 units)	Transitional	General Population (Women Only)	5 Women w/children

Source: *City of Melbourne Housing and Community Development Department, 2005.*

^NOTE: The building is owned by the Melbourne Housing Authority, but leased and managed by CHH.

*NOTE: These facilities are located outside, but close to, Melbourne's city limits

E. Other Relevant Data – Transportation

Public transportation is generally relegated to bus service, vanpools, paratransit or door to-door services for the elderly and disabled. Public transportation services are mainly provided through the Space Coast Area Transit, a service of the Brevard County Board of County Commissioners. SCAT provides public bus service with 21 routes to major area shopping centers and grocery stores, hospitals, colleges, City and County facilities, and cultural centers in the City of Melbourne and Brevard County. Buses are equipped with wheelchair lifts and can accommodate bicycles. City of Melbourne residents are permitted to ride free on several designated routes. Senior citizens, students, and disabled persons ride for half price and children under 5 ride free.

SCAT also manages a vanpool program that provides transportation to contracted groups of commuters in Brevard County and to various social service agencies. The transit provider has established a Commuter Assistance program to help commuters

map out alternative ways to travel other than in singly occupied vehicles. SCAT also administers the Transportation Disadvantaged Program. The program is a state initiative to provide door-to-door transportation to those individuals who are unable to access regular bus service or operate a motor vehicle because of physical or mental disabilities.

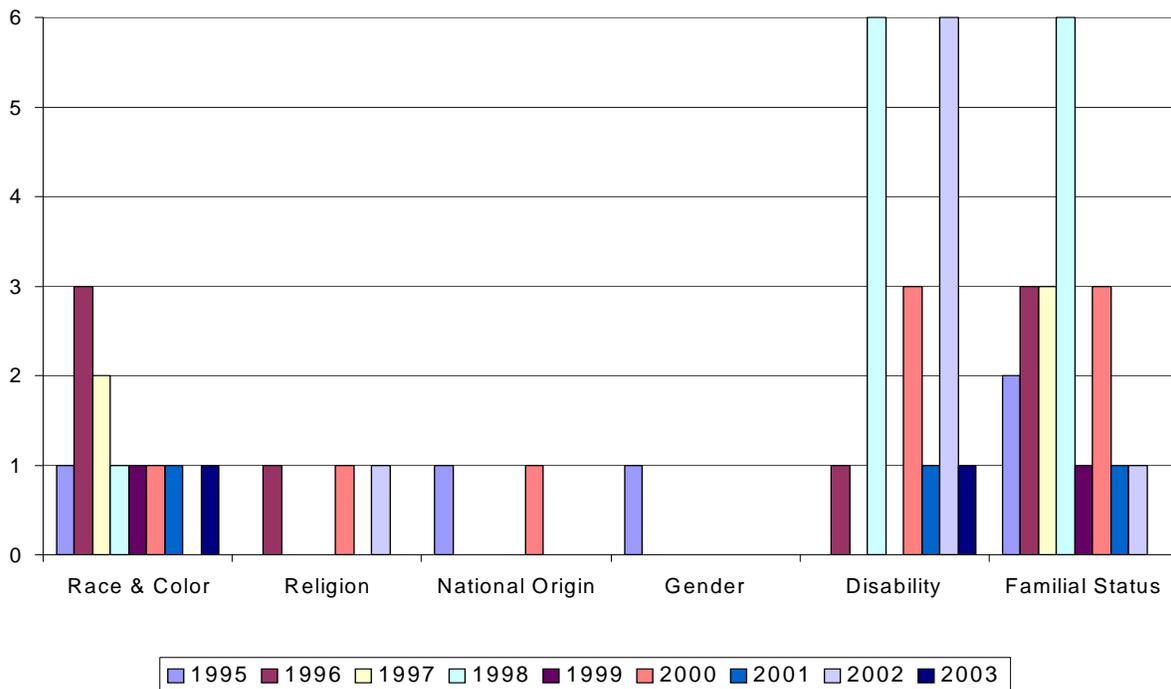
III. Evaluation of Jurisdiction’s Current Fair Housing Legal Status/Profile

Persons who feel they have been victims of fair housing discrimination can file a complaint with the City of Melbourne’s Housing and Community Development Department where staff will make inquiries and if necessary refer the complaint to the Florida Commission on Human Relations or the U. S. Department of Housing and Urban Development. The Fair Housing Continuum is another avenue for filing complaints of fair housing discrimination. The City often refers complaints to the Continuum for further inquiry. Persons filing complaints can also go to the Continuum directly.

A. Existing Fair Housing Complaints or Compliance Reviews

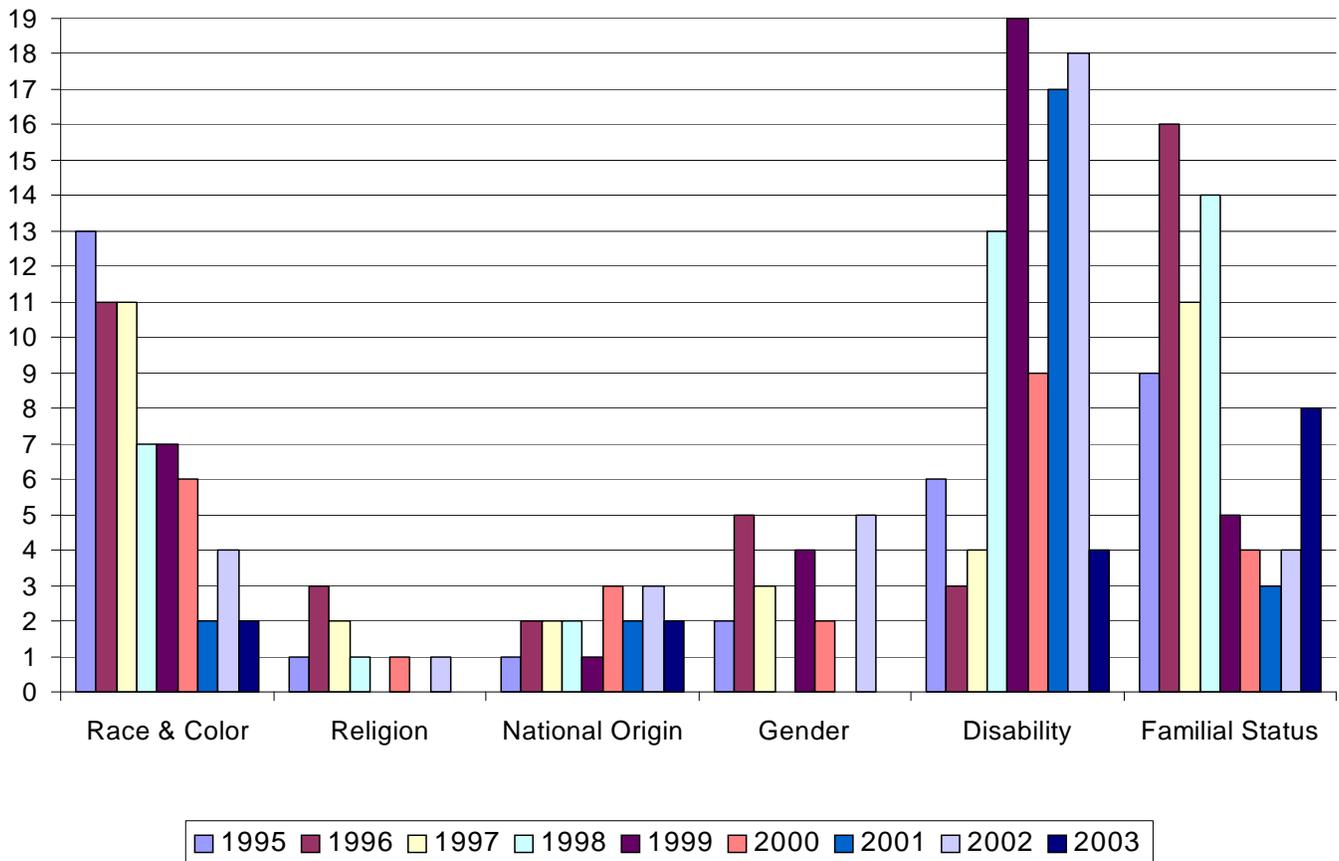
For the year ending 09/30/03, the City of Melbourne received zero (0) calls from residents regarding housing discrimination. The following tables summarize the number and nature of housing discrimination complaints filed with the Fair Housing Continuum in the City of Melbourne and Brevard County between 1995 and 2003:

City of Melbourne Fair Housing Complaints by Year and Protected Class



Source: Fair Housing Continuum, Inc.

Brevard County - Fair Housing Complaints by Year and Protected Class



Source: Fair Housing Continuum, Inc.

B. Existing Fair Housing Discrimination Suits

Currently, no fair housing discrimination suits exist against the City of Melbourne.

C. Identification of Other Fair Housing Concerns or Problems

Between 1995 and 2004, the majority of fair housing complaints were related to discrimination based on race and color, disability, or familial status. This is true within the City of Melbourne, as well as within the Brevard County Entitlement Areas and Brevard County as a whole.

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

A. The City of Melbourne

Fair Housing Ordinance – In 1998 the City of Melbourne adopted its current Fair Housing Ordinance. The ordinance includes procedures for persons subjected to discriminatory housing practices to file a complaint with the City

Zoning - The R1-B residential zoning district allows reduced lot sizes, setbacks, and

building square footage to promote affordability of single-family homes, thereby facilitating home ownership among low-income persons.

Housing Incentive Plan – Melbourne City Council adopted the City’s Housing Incentive Plan in January of 1994. The Plan includes proposed incentives for addressing affordable housing issues. It was written based on the recommendations of the Melbourne Affordable Housing Advisory Committee. Most of the proposed incentives have been implemented. Implemented incentives include: allowance of increased density in affordable housing development, reduction in side yard setbacks and drive aisle widths, expedited processing of permits for affordable housing. A process of reviewing proposed actions/policies that could potentially affect housing cost was also implemented and reviewed and updated in 2004.

Citizen Participation – Citizens are invited to participate in various planning processes from redevelopment plans to park master plans. Citizens are also asked to participate in the planning process for the Housing Assistance Plan, Consolidated Plan and annual Action Plans. These plans must be submitted as part of the application process for state and federal funds. Public meetings are advertised in local newspapers and displayed on City bulletin boards. Advisory boards are a part of the organizational framework and have been successful in maximizing citizen participation in many aspects of City government. City Code charges the Citizens’ Advisory Board with responsibility for reviewing policies and making recommendations on all HUD-funded programs in the City. The Building and Construction Advisory Committee is required to review all proposed City policies could potentially have an impact on the affordability of housing in Melbourne. Advisory Board meetings are public.

Advertising – The City of Melbourne advertises the availability of federal and state funds for housing assistance to very low- and low-income households, including special needs populations (see the next section for housing assistance programs). Local contractors are invited to submit competitive bids for the housing rehabilitation programs. Solicitation of bids is publicized through various forms of media. The City also advertises the availability of various plans and reports for public review and comment.

B. The City of Melbourne Housing & Community Development Department Programs and Activities

The City of Melbourne’s Housing Programs that are administered through the Housing and Community Development Department are focused on developing affordable housing and helping very low- and low-income households meet their housing needs. Affordable housing is related to fair housing to the extent that low-income persons tend to be members of protected classes. As a result of these circumstances, such households tend to have fewer resources and face more discrimination in trying to meet their housing needs. In that regard, access to affordable housing, both rental and owner occupied housing, overlaps with fair housing. The City offers a range of rental and homeownership programs and activities to meet those needs. The following is an explanation of the programs and activities:

Rehabilitation of Owner Occupied Housing – The City of Melbourne, using SHIP and HOME funds, rehabilitates owner-occupied substandard homes on a continuing basis. Owner-occupied homes that are not suitable for rehabilitation may receive assistance to demolish an existing home and build a new home on the same site. Details and amounts expended are documented in HOME and SHIP annual reports on file in the Housing & Community Development office.

Rental Housing - SHIP and HOME funds are often used to rehabilitate housing that is to be rented to low-income or very low-income households, including those with special needs. Funds have been used to rehabilitate units for: the elderly, the disabled, persons recovering from substance abuse, homeless persons or those threatened with homelessness, battered women, and children in foster care. Public housing has also benefited from improvements through city rental housing programs.

Purchase Assistance Program – Since 1997, The City of Melbourne has allocated SHIP funds to aid eligible low-income and very low-income homebuyers with down payment, closing, and repair costs. This program has aided almost 150 households who would not have otherwise been able to secure the initial funds needed to allow them to own a home. Homebuyers who access this program are free to find an affordable home to purchase anywhere in the City.

Demolition – CDBG funds are available to demolish dilapidated, unsafe housing in Melbourne's low-income target areas to improve neighborhood appearance and to prevent persons from occupying these unsafe structures. Only long-vacant, substandard structures, dilapidated beyond repair are considered for demolition.

Tenant Assistance Program – SHIP funds are available to low-income and very low-income households for rental security and utility deposits.

Tenant Based Rental Assistance Program – HOME funds are available on a temporary basis for rental subsidies to very low-income renters who are elderly, disabled, or actively pursuing self-sufficiency.

Transitional or Emergency Housing – Financial support has been provided to several non-profits involved in providing emergency or transitional housing. This includes the Women's Center, which provides transitional housing and services for women and their children, Hacienda Girl's Ranch which provides transitional housing and services for teenage women in foster care, and Sally's House, a shelter for women (with children) recovering from substance abuse. The City also participates in the Continuum of Care with other transitional and emergency care providers in Brevard County. The Continuum is working towards meeting the needs of homeless and potentially homeless persons with appropriate services, and annually performs a census of the homeless in Brevard County to provide the data necessary to better plan for needed services. The Continuum is an opportunity for such providers to share ideas and experiences, set goals, and develop a consensual plan to better aid homeless persons. The Continuum

also allows members the opportunity to expand the reach of their resources, prevent overlap in services, or prevent unnecessary services from being provided.

Fair Housing Education and Outreach – The City continually promotes fair housing through brochures available to the public at the Housing and Community Development Department. The brochures explain the concept of fair housing and the Fair Housing Act. It also instructs persons on how to report fair housing violations. The City also provides state SHIP grant money to non-profits to provide homebuyer education classes to the public. One of the topics covered is fair housing. In 2005, the City hosted a fair housing workshop targeting city employees and city board members working with housing-related issues, as well as private housing providers and the general public. The workshop was facilitated by The Fair Housing Continuum, Inc. and was funded by the City's CDBG Program. More recently the City has focused on funding the Fair Housing Continuum to conduct fair housing testing.

Advertising – In its effort to promote fair housing choice, the City of Melbourne regularly advertises the availability of federal and state grant funds for housing assistance to low-income and very low-income persons and households, including special needs populations. Assistance available to eligible persons includes homeowner disaster relief assistance, homeowner rehabilitation, including demolition and reconstruction, purchase assistance to homebuyers, assistance to rental developments, and assistance with rent or security and utility deposits. Local contractors are invited to submit competitive bids for rehabilitation or new construction projects. Minority and women-owned businesses are encouraged to participate.

Homeownership Education – SHIP monies are used to fund a homeownership education program. The program is open to anyone. Topics covered include: fair housing, locating a home, credit issues, the costs of homeownership, the mortgage, the real estate process, the lender process and awareness of predatory lending, the closing process, and foreclosure prevention.

Neighborhood Improvements and Public Services – CDBG funds are used for street improvements, fire hydrants, park and community center upgrades and additions. The projects vary from year to year, but all projects benefit low and very low-income neighborhoods. CDBG funds are also used to provide public services to qualifying persons in these and other neighborhoods. In the past, funds have been used to provide scholarships for children to attend summer camp, subsidized childcare, and for participation in the Police Athletic League and athletic and youth development activities.

Other – The Housing and Community Development Department engages in a range of activities on an ongoing basis to assist all low-income households, not just those directly accessing the City's housing programs. The Department maintains a list of affordable rental units. The Department also maintains a list of public service providers in order to refer people in need to the appropriate providers. The City is currently in the process of implementing a Homeownership Infill Housing Program that will provide affordable housing to low-income households on infill lots scattered throughout the city. One of the

goals of this program is to integrate affordable housing with various other types of housing. City Council also allotted HOME funds to a non-profit housing provider, Abilities of San Juan, Inc., to rehabilitate and make nine (9) units in an apartment complex handicap accessible. These units will then be rented to very low-income households where one or more persons have a physical disability.

C. Private Sector

Real Estate Industry – Members of the Melbourne Area Association of Realtors (MAAR) must take an oath to uphold a Code of Ethics which prohibits members from denying professional services to or discriminating against persons for reasons of race religion, gender, color, handicap, familial status or country of origin. Members vow not to divulge information about a neighborhood’s racial, ethnic, or religious composition or engage in panic selling. The MAAR also offers several continuing education classes on line, including one entitled *The ADA and Fair Housing* and another one called *Ethics*, which provides information about the Code of Ethics. Monthly seminars also periodically cover these topics.

Brokerage Service –Members of the National Association of Mortgage Brokers (NAMB), of which Florida Association of Mortgage Brokers (FAMB) is an affiliate, are also offered classes on Fair Lending Laws and Ethical Business Practices. Members of the NAMB are encouraged to sign a certificate that they will adhere to the association’s Best Lending Practices code. When members make this pledge, they promise to practice their trade without discrimination. FAMB members are offered a wide range of classes for continuing education. Classes include Fair Lending, Florida’s Fair Lending Act, and Business Ethics. Mortgage Brokers in Melbourne belong to the Space Coast Chapter of the National Association of Mortgage Brokers.

Lending Industry – Local banks regularly schedule seminars or publish guidebooks to inform and educate low-income persons about the availability of loan programs for first time homebuyers and loans for home improvements. Many local banks maintain regular contact with community development agencies to stay abreast of the needs of low-income neighborhoods and to contribute to assisting with meeting those needs.

Home Builders – The National Association of Home Builders (NAHB) offers a range of continuing education courses both online and at various sites throughout the country, that include fair housing as part of the curriculum. The Florida Home Builders Association has made affordable housing in Florida a top priority. The Association has a 10-point “game plan” to address issues of affordability. One of their goals is to make affordable housing programs accessible to all builders, not just large volume builders who specialize in the affordable housing industry.

In Melbourne and Brevard County, many for-profit homebuilders offer services to South Brevard Habitat for Humanity at no cost or reduced costs. The goal of Habitat for Humanity is to provide homeownership opportunities to households making 60% or less of the median area income.

Architects – The American Institute of Architects offers continuing education classes that address fair housing as it relates to accessibility and design.

D. Fair Housing Advocacy Groups and Related Groups

Fair Housing Continuum, Inc. – The Fair Housing Continuum is located in Cocoa, Florida and serves all of Central Florida. The Continuum offers a range of services that include: counseling to individuals on their federal and state fair housing rights, providing technical assistance to businesses, civic organizations and government agencies throughout Central Florida to help them develop strategies to address fair housing issues, conducting seminars, workshops, and presentations on various topics related to fair housing, and processing housing discrimination complaints, and attempting conciliation with the client and the respondent.

Space Coast Center for Independent Living – The Space Coast Center for Independent Living is based in Cocoa Beach, but offers services throughout Brevard and Indian River counties. The agency's mission is to advance through service and advocacy the social, economic, and physical welfare of person with disabilities, their families and friends; cooperate with local, state and national organizations serving persons with physical disabilities; promote rehabilitation and employment opportunities; to provide a forum for the discussion of disability related issues; to conduct a program of public education aimed toward eliminating attitudinal and architectural barriers; to promote other such activities for the improvement, betterment, and common welfare of persons with disabilities.

E. Interagency Coordination – The goals and objectives of community reinvestment, federally or state funded community development and housing programs, and equal opportunity are bringing private and public sector entities together more frequently than ever before. The mandates of housing programs like SHIP and HOME are continually drawing the City of Melbourne into public-private partnerships with private for-profit organizations and non-profit groups, and other local governments. As a member of the Brevard County HOME Consortium, the City of Melbourne must participate in the Consolidated Planning process, a process which necessarily pulls together numerous agencies into an ongoing discourse regarding housing and community development needs, concerns, and issues. The Brevard HOME Consortium contributed funds to the Fair Housing Continuum, Inc. for the Continuum to produce a campaign to promote public awareness of fair housing. The Consortium's partnership with the Fair Housing Continuum gives both groups the opportunity to share information about fair housing.

The City of Melbourne has partnered with private sector organizations on many projects. The city has partnered with Habitat for Humanity on many occasions to provide second mortgages at zero percent interest to Habitat homebuyers. The City's contribution of SHIP funds has allowed Habitat to develop Faith Landings, its largest undertaking to date and the organization's first subdivision development, consisting of

28 single-family homes. The City has provided SHIP funds to Community Housing Initiative to provide homebuyer education classes citywide, especially for persons buying a home through the Purchase Assistance Program. Fair Housing Law is one component covered in the classes.

V. Areas for Potential Discriminatory Housing Practices and Their Status in the City of Melbourne

A. Public Sector

1. Public Policy including Zoning, Subdivision Regulations, Building Codes, ADA/504 Compliance

The City of Melbourne's Code Compliance Division reviews building permit application documents that have been submitted for compliance with the Americans with Disabilities Act. The City offers expedited permitting of affordable housing projects. The City also has also established a system to review all policy changes related to housing for their potential impact on housing affordability.

2. Municipal and Other Services

The City of Melbourne makes all municipal services available to residents throughout the city including water, sewer, and solid waste and recycling services. The City of Melbourne's Housing & Community Development Department has funds available to help defray the cost of utility and rental security deposits for very low-income renters. Disabled persons may opt to have their trash collected directly outside of their back door instead of bringing it to the curb at no additional cost. Water and sewer fees vary based on the size of the meter, with higher rates for those outside than those inside city limits. City water and sewer lines are replaced or repaired on a regular cycle.

Emergency services that are provided by the city including police, fire protection, 911 service, and fire hydrants are also uniformly available to all residents regardless of race, ethnicity, national origin, religion, sex, familial status, or disability. The seven city fire stations are dispersed throughout the city so that no home or building is more than four (4) minutes from a station.

The city strives to provide a mix of community and neighborhood parks that offer a broad range of passive and active pursuits. The city's 34 parks are well dispersed and maintained on a regular cycle.

The city has a street resurfacing program. The goal is to resurface 6 to 8 miles of paved roads a year, continually cycling through all of the streets in order to keep them in good condition.

3. Neighborhood Revitalization

Neighborhood revitalizations efforts have focused on a broad range of neighborhoods

throughout the city. Revitalization plans have been developed and are being carried out in low-income neighborhoods, commercial districts, historic neighborhoods, and blighted areas to name a few. During the planning process for each revitalization plan, public participation was sought and during the implementation process, public participation continues to play an important role.

4. *City Boards*

Members of the City of Melbourne's Boards are selected without regard for either race or ethnicity. There is one application form for all Boards and the form does not ask for an applicant's race or ethnicity.

5. *Employment, Housing, and Transportation Linkages*

Public transportation, which includes public bus service, vanpools, and door-to-door service is well distributed throughout Melbourne. Bus stops can be found in close proximity to many neighborhoods in the city. Major area shopping centers, grocery stores, hospitals, colleges, City and County Facilities, and business centers within the city and Brevard County can be accessed via the Space Coast Area Transit bus system. Several routes are free to City of Melbourne residents and there is no charge for transfer if a riders asks for a transfer pass when he or she enters the system. Senior citizens, students, and disabled persons ride for half price. Children under 5 ride free.

6. *Sale of Subsidized Housing and Possible Displacement*

There have been two (2) sales of subsidized housing in the City, a SHIP-funded 20-unit rental housing rehabilitation project located at 825 East University Blvd. and Ramshur Towers, a 101-unit, SHIP-funded rental rehabilitation project. As a state housing funding source, SHIP does not have any regulations requiring one-for-one replacement when a unit is lost to the affordable housing inventory. However, Ramshur Towers was a Melbourne Housing Authority-owned and operated complex for the elderly and persons with disabilities. Its sale in May 2005 triggered Federal regulations requiring one-for-one replacement, and the Housing Authority will be replacing not only the 101 units lost, but adding nearly 500 additional units ensuring that all its current residents will have affordable housing.

7. *Property Tax Policies*

The millage rate is 4.7856 mills throughout the entire city. The millage rate was increased for fiscal year 2004, the first such increase in six years.

8. *Public Housing Authority and Other Assisted /Insured Housing Provider Tenant Selection Procedures*

The City performs annual monitoring of those affordable housing providers, including the Melbourne Housing Authority, that have been assisted with SHIP and HOME funds

through the City's housing programs. The monitoring includes a review of tenant selection procedures. Recent monitoring visits have not revealed any discriminatory tenant selection policies in place.

B. Private Sector

Lending Policies and Practices

An analysis of the 2001 Home Mortgage Disclosure Act (HMDA) disclosure statements for the Melbourne-Titusville-Palm Bay MSA was undertaken to determine if discriminatory lending patterns exist. HMDA data is collected for conventional loans, home improvement loans, and Federal Housing Administration (FHA) loans, Veterans Administration (VA) loans, and Farm Service Agency (FSA)/Rural Housing Service (RHS) loans. FHA loans are administered by the Federal Housing Administration which operates under the control of the U.S. Department of Housing and Urban Development (HUD). These loans are available for homebuyers who for various reasons may not otherwise qualify for a conventional loan. In order to serve these households HUD assumes some of the risk associated with granting them loans. VA loans are administered to United States military veterans. FSA and RHS loans are administered by the U. S. Department of Agriculture. FSA loans are available for farmers who don't qualify for conventional loans. RHS loans are given to low-income and very low-income households in rural areas.

An analysis of the 2001 Home Mortgage Disclosure Act (HMDA) disclosure statements for the Melbourne-Palm Bay-Titusville MSA revealed lending patterns that may or may not be attributed to discrimination. Due to the limited information available about each individual applicant, one can only speculate on the reasons behind the patterns. The data that is available through the HMDA only provides enough information to reveal possible patterns of discrimination by race, income, or gender, so conclusions based on any patterns can only be speculative. HMDA statements show that the main reason for loan denial was a poor credit history. This was true regardless of race, income, or gender.

Of the conventional loan applications received in the Melbourne-Palm Bay-Titusville MSA in 2001, 10.3% of them were denied. When the data was considered in terms of race of the applicants, black applicants had the highest rate of denial of those applicants whose race was known. Those persons that were a mix of white and one other race had the lowest rate of denial. Whites had the lowest rate of denial among persons of a single race. Among FHA, FSA/RHA, and VA loan applicants, those whose race was noted as "Other" had the highest rate of denial. Those of mixed race had the lowest rate of denial, followed by white persons. Among home loan improvement applicants, blacks had the highest rate of denial and Asian/Pacific islanders had the lowest. Blacks had higher rate of denial than whites, Hispanics, American Indians, and Asian/Pacific Islanders, and whites had lower rate of denial than Hispanics, and American Indians.

Denial rates of home loans by income reveal a more obvious pattern than denial rates by race. As income increased, the denial rate decreased. This is true of conventional

home loan applicants, FHA, FSA/RHA, and VA loan applicants, and home improvement loan applicants. While this pattern may be attributed to discrimination towards low-income persons, it is more likely to be attributed to the fact that low-income persons often have more credit issues, less spending power, and less equity than higher income persons.

Denial rates for conventional home loans are higher for males than females. Denial rates among FHA, FSA/RHA, and VA loan applicants and home improvement loan applicants are higher for females than males. Home loan denial rates for any of the three loan types mentioned are lowest for those persons applying jointly.

Home loan denial rates in the City of Melbourne North and South Target Areas vary when compared to denial rates for the entire city and MSA. Denial rates for conventional loan applications in the North and South Target Areas were 13.3% and 15.6% respectively. They were 11.2% for the City of Melbourne and 10.3% for the MSA. Persons living in the North Target Area who applied for FHA, FSA/RHA, and VA loans were denied 14.0% of the time compared to 8.7% for the city and 7.5% for the MSA. The rate of denial for South target area applicants was only 6.8%. In the North Target area 40% of home improvement loan applicants were denied. This is just slightly higher than the city's overall denial rate of 39.3%, but less than the MSA denial rate of 41.0%. Only 34.9% of South Target area persons applying for home improvement loans were denied. These rates in the North and South Target areas do not indicate a pattern of denial that can be attributed to discrimination.

**2001 Denial Rates of Conventional Home Purchase Loans and VA/FHA Loans by Race
in the Melbourne-Titusville-Palm Bay MSA**

Race	Conventional Loans			FHA, FSA/RHS, VA Loans			Home Improvement Loans		
	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied
American Indian/Alaska Native	38	6	15.8%	8	0	0.0%	11	3	27.3%
Asian/Pacific Islander	154	16	10.4%	22	0	0.0%	11	2	18.2%
Black	377	71	18.8%	278	28	10.1%	102	59	57.8%
Hispanic	382	51	13.4%	164	12	7.3%	54	28	51.9%
White	9,931	755	7.6%	2,809	197	7.0%	1,275	418	32.8%
Other	148	21	14.2%	38	4	10.5%	17	7	41.2%
Mix of White and Minority	156	6	3.8%	79	3	3.8%	26	9	34.6%
Not Known	2,235	455	20.4%	408	42	10.3%	1,305	622	47.7%
MSA Totals	13,421	1,381	10.3%	3,806	286	7.5%	2,801	1,148	41.0%
City of Melbourne Totals	1,552	173	11.1%	497	43	8.7%	336	132	39.3%

HMDA web site

2001 Denial Rates of Various Home Loans by Income in the Melbourne-Titusville-Palm Bay MSA

Income of Applicants as a % of Median MSA Income	Conventional Loans			FHA, FSA/RHS, VA Loans			Home Improvement Loans		
	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied
Less than 50% of Median	1,428	314	22.0%	659	81	12.3%	384	232	60.4%
50-79% of Median	2,461	353	14.3%	1,291	101	7.8%	595	267	44.9%
80-99% of Median	1,871	194	10.4%	746	45	6.0%	402	157	39.1%
100-119% of Median	1,404	120	8.5%	455	25	5.5%	293	102	34.8%
120% or more of Median	5,611	339	6.0%	609	33	5.4%	973	281	28.9%
Income not Available	646	61	9.4%	46	1	2.2%	154	109	70.8%
Total (MSA)	13,421	1,381	10.3%	3,806	286	7.5%	2,801	1,148	41.0%
City of Melbourne Totals	1,552	173	11.1%	497	43	8.7%	336	132	39.3%

HMDA web site

2001 Denial Rates of Various Home Loans by Gender in the Melbourne-Titusville-Palm Bay MSA

Gender	Conventional Loans			FHA, FSA/RHS, VA Loans			Home Improvement Loans		
	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied
Male	3,685	449	12.2%	1,243	96	7.7%	448	175	39.1%
Female	2,509	261	10.4%	810	75	9.3%	400	157	39.3%
Joint	5,394	326	6.0%	1,406	83	5.9%	702	219	31.2%
Total (MSA)	11,588	1,036	8.9%	3,459	254	7.3%	1,550	551	35.5%

HMDA web site

2001 Denial Rates of Home Loans in Target Areas

Location	Conventional Loans			FHA, FSA/RHS, VA Loans			Home Improvement Loans		
	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied	Applications Received	Applications Denied	% of Loans Denied
North Target Area Census Tracts (census tract 643.02)	105	14	13.3%	43	6	14.0%	30	12	40.0%
South Target Area Census Tracts (census tract 649.02 & 651.01)	160	25	15.6%	59	4	6.8%	43	15	34.9%
City of Melbourne Totals	1,552	173	11.1%	497	43	8.7%	336	132	39.3%
MSA Totals	13,421	1,381	10.3%	3,806	286	7.5%	2,801	1,148	41.0%

HMDA web site

VI. Summary of Impediments and Recommended Action Items

A. Impediment: Low Levels of Public Awareness about Fair Housing

Action Response #1: As a member of the Brevard County HOME Consortium, the City will continue to partner with Fair Housing advocacy and enforcement groups to share information about fair housing and to promote public awareness of fair housing via public media campaigns.

Time frame: Ongoing

Action Response #2: The City will provide opportunities for City staff and volunteer board members involved in decision making that impacts housing to be educated about fair housing issues.

Time frame: Ongoing

Action Response #3: The City will continue to incorporate Fair Housing Education into homebuyer programs that it funds. Non-profits under contract with the City to provide housing assistance will be contractually obligated to make Fair Housing Education a component of homebuyer education programs.

Time frame: Ongoing

Action Response #4: The City will continue to promote fair housing by making informational flyers available at various locations in the community including the Housing & Community Development Department.

Time frame: On going

B. Impediment: Limited Supply of Affordable Housing

Action Response #1: The City of Melbourne will continue to address the need for affordable housing through its housing and community development programs. These programs address the housing needs of very low-income and low-income homeowners and renters.

Time frame: Ongoing

C. Impediment: Predatory Lending

Action Response #1: The City will continue to counsel with and caution assisted homeowners who access any of the City's housing programs about the dangers of predatory lending.

Time frame: Ongoing