

The City of Columbia

2020 Analysis of Impediments to Fair Housing Choice



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Executive Summary

The City of Columbia 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. As a result, the City of Columbia is charged with the responsibility of conducting its CDBG programs in compliance with the federal Fair Housing Act. Additionally, the City of Columbia receives Home Investment Partnerships (HOME) program funds from HUD to which the City's obligation to promote fair housing choice is also extended. 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 Columbia. Entitlement communities receiving CDBG and HOME 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 AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice. The following AI serves as a comprehensive look at fair housing issues in the city —ranging from an analysis of various demographic, economic, and housing indicators to a review of public and private sector policies that affect fair housing. Based on this analysis and review, a list of impediments to fair housing choice was identified, along with suggested actions that could be taken to address these impediments.

With the rising pressure to create fair housing choice, which includes, Protected Choice, Actual Choice, and Quality Choice, the City of Columbia faces barriers and impediments such as unlawful discrimination or systematic bias in the effort to realize fair housing for all residents seeking housing. To ensure that all residents in the city are protected under state and local law, and to adhere with the Department of Housing and Urban Development (HUD) regulations on fair housing as required by HUD entitlement grants, the City of Columbia has taken steps to promote

fair housing and to educate its leadership, staff, and residents on what HUD defines as fair housing and discrimination in housing. Further, the city has identified what steps it must take to overcome the barriers identified and what the consequences are for those who do not adhere to a policy of fair housing and non-discrimination.

The conclusion of this analysis has identified several current impediments to fair housing choice. For each impediment, recommendations and outcome measures have been identified for activities that can help to alleviate these impediments moving forward. The current impediments to fair housing choice are:

- 1. The Zoning Ordinance and Land Use Regulations Constrain Housing Diversity.
- 2. The Aging Housing Stock Requires Increased Investment and Maintenance.
- 3. There is a Shortage of All Types of Residential Product.
- 4. A Majority of Renters are Cost Burdened.
- 5. There has been a Decline in The Amount of Non-Student Housing.

Strategic actions that can help address impediments identified include several steps that will be taken by the city are as follows:

- Establish incentives to encourage developers to construct affordable housing units.
- Leverage public land and funding to develop affordable housing.
- Incentivize development of multi-unit housing.
- Create a Columbia Housing Trust Fund.
- Revise the Zoning Ordinance and Land Development Regulations.
- Increase the Housing Inventory by Promoting Infill and Additional New Residential Redevelopment.
- Increase the Promotion of Fair Housing.
- Expand and Leverage Financial Support to Housing Assistance Programs.
- Strengthen the Rental Housing Regulations Ordinance.

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Introduction

The City of Columbia is the capital and second largest city in South Carolina, as well as the geographic heart of the state. According to the most recent American Community Survey, in 2017 the population was 132,236. While it received its first charter as a town in 1805, its history dates back well into the mid 1700's. Located in Richland County, Columbia is the primary city of the historic Midlands area, and the center of the Columbia Metropolitan Statistical Area (MSA) with the city having a total land area of 134 square miles. Columbia is also home to Fort Jackson, the largest US Army installation for basic combat training. Fort Jackson stretches across the eastern portion of the city and has a total area of 81 square miles – over half of Columbia's total area.

Purpose of Fair Housing

Fair housing has been long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem – but it was far from a solution. Since the passing of the Act community groups, private business, concerned citizens, and government agencies at all levels have worked earnestly at battling housing discrimination. The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) 'affirmatively further fair housing' through its programs. Towards this end HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.

As part of the HUD-mandated Consolidated Planning process, Columbia is set to adopt its Five-Year Consolidated Plan in 2020. The Five-Year Consolidated Plan represents an assessment of the economic and social state of the City, as well as local government policies and programs to improve the living environment of its low and moderate-income residents. The Strategic Plan includes a vision for the City that encompasses the national objectives of the Community Development Block Grant (CDBG) program and is accompanied by a first year Action Plan that outlines short-term activities to address identified community needs. As part of the planning process, Columbia must also affirmatively further fair housing and undertake fair housing planning. This process includes the preparation of an Analysis of Impediments to Fair Housing Choice.

This 2020 Analysis of Impediments to Fair Housing Choice represents an in-depth examination of potential barriers, opportunities and challenges to housing choice for Columbia residents on a citywide scale. 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.

This Analysis of Impediments is an extension of the Citywide Consolidated Plan. 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 and 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 City residents. The Analysis is intended to serve as a strategic planning and policy development resource for local decision- makers, staff, service providers, the private sector, and community leaders in the City of Columbia. As such, this Analysis of Impediments will ultimately serve as the foundation for fair housing planning in the City.

The long-term objective of this Analysis of Impediments to Fair Housing Choice is to make housing choice a reality for Columbia residents 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 brief overview of the legal and conceptual aspects of fair housing planning and policy.

Fair Housing Concepts

Housing choice plays a critical role in influencing both individual and family realization and attainment of personal, educational, employment and income potential. The fundamental goal of HUD fair housing policy, and that of the State of South Carolina and Columbia policies, is to make housing choice a reality through sound planning. Through its on-going focus on Fair Housing Planning, 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 fair housing planning 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 effecting 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: 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 family 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 family 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 family 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 of Impediments to Fair Housing Choice consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within the City of Columbia. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the City with a 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 of the community, as well as areas outside of the city center.
- Specific recommendations and activities for the City to address any real or perceived impediments that exist; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice

Most of the data in this section comes from either the 2010 Decennial Census or the 2013-2017 American Community Survey, both conducted by the US Census Bureau. The most recent data set at the time of the research that includes all of the HUD required data points is the ACS 2017. When comparing multiple variables, the ACS provides a consistent methodology and combined data set that both allows us to analyze the trends and keep a higher level of confidence with our conclusions. When additional or more recent data sources are used, they will be clearly identified. It should be noted that the estimates provided are meant to show overall trends and not exact counts. In most cases, different data sources will differ on their estimates due to differences in methodology, but the overall trends will support each other. Note, in most studies, the Census Bureau includes in its poverty evaluations all residents except those living in institutional group quarters, military barracks, college dorms and children younger than 15 who are not related to the householder.

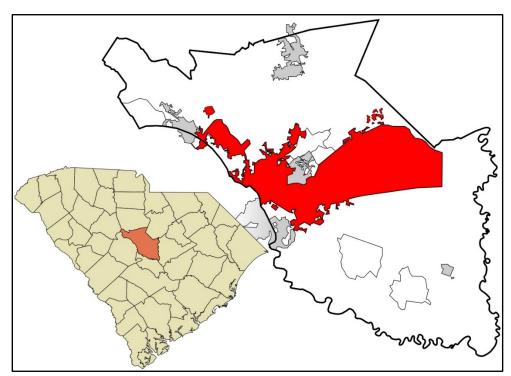
Additional Data Sources Include: U.S. Census Bureau reports, American Community Survey data (ACS), the US Bureau of Labor Statistics (BLS), Longitudinal Employer-Household Dynamics (LEHD), Boxwood Means Inc. via PolicyMap, Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act data (HMDA), and the US Department of Housing and Urban Development (HUD)

Community Profile

The goal of the community profile is to paint a picture of the current demographic, economic, and housing trends of the City of Columbia. This data is an important tool to aid decision makers in affirmatively furthering fair housing and utilizing grant funds. The Community Profile is broken into two key sections.

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

The second 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 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 empirically advance fair housing planning efforts and identify any impediments to fair housing choice.



Location of Columbia and Richland County in South Carolina

Demographic Profile

Cities aren't structures; cities are people.

- Ed Glaeser, "Triumph of the City"

Introduction

The Demographic Profile looks at the City from the perspective of its people. Understanding where residents live, and their housing needs is the foundation of any analysis. It is necessary to understand where people live and where they do not in order to identify any impediments. This process requires exploring several demographic variables such as race and ethnicity, age, disability status, and others. This information will allow the City 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 of the City are and how they have changed is necessary before policy changes can be proposed.

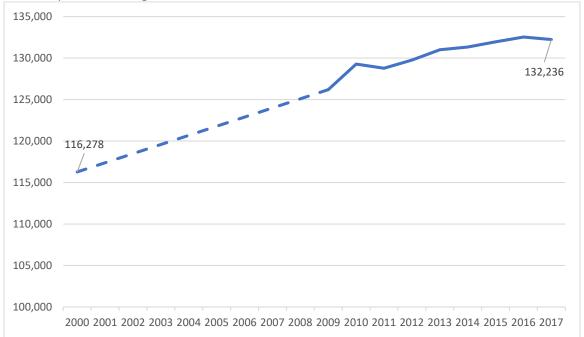
Population

Understanding how the population has changed over time is one of the most important demographic data points available. This change, and how it compares to other jurisdictions, gives a broad view of whether the area is a place that residents want to live or not. 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.

In the City of Columbia, the population has grown by approximately 13.7% between 2000 and 2017. The city's growth rate has been significantly slower than the statewide growth rate of 22.0%. Since 2000, the population has grown steadily, adding approximately 1,000 people each year since 2000. However, starting in 2013 the growth rate slowed and only 1,232 total new residents have been reported since then.

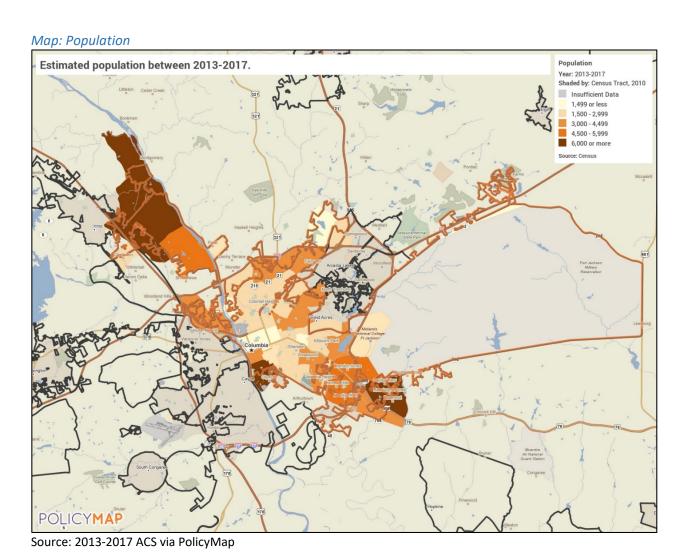
Chart: Population Change



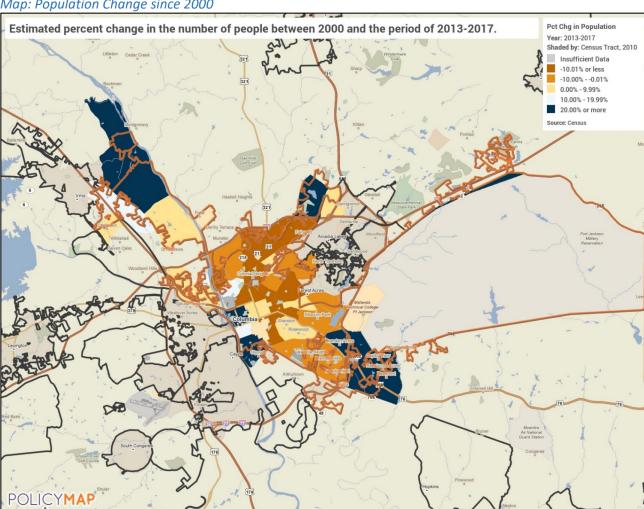
Source: Decennial Census (2000 & 2010), American Community Survey 5-Year Estimate Data table available included in the Appendix

An important aspect of the jurisdiction's population is where within the City's residents live and previously lived. Census tract boundaries are determined every ten years by the US Census Bureau with an attempt to place 4,000 people per tract. Tracts that are significantly larger or smaller than 4,000 people may represent tracts with a significant population change since 2010. Areas that have significantly more than 4,000 people may be areas that have seen significant growth during this time period while lower population tracts have seen the population shrink.

There are three areas that have disproportionately populous census tracts: in the northwest, southern downtown, and the southeastern corner of the City. Each of these tracts has 6,000 people or more. On the other end of the spectrum, the central part of the city and tracts in the northeast have noticeably smaller populations with less than 3,000 people.



Looking at the change in population since 2000 can provide a longer view in changes in the City. These trends may be less likely to predict changes in the next year or two, but this data provides a better foundation for identifying long-term trends. As hypothesized above, the census tracts that show the heaviest concentration of residents include several of the areas that saw the largest growth since 2000. The three areas above, as well as the northeast corner all have tracts that grew by 20% or more. Geographically, most of the City saw the population decrease, including many tracts that are over 10% less populous now than in 2000.



Source: 2013-2017 ACS via PolicyMap

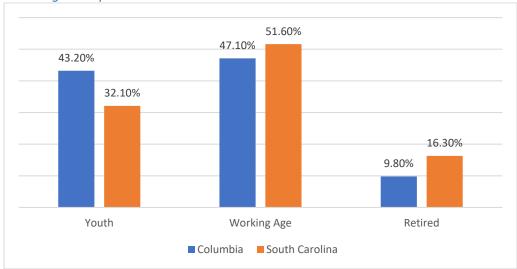
Age Groups

The age distribution 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 in. 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 City of Columbia has a relatively young population, particularly when compared to the state. The median age of Columbia is over a decade younger than South Carolina's median age. This figure is heavily influenced by the presence of the University of South Carolina with its near 35,000 students (as of 2018). Nearly 73% of these students live off-campus and are counted in ACS survey data and estimates. The age demographics of a City can have a major impact on the policies and priorities for funds. A jurisdiction with a large elderly population will likely put resources towards smaller homes, accessible housing, medical facilities, and other social services. Younger cities may prioritize encouraging larger housing that will encourage families to stay in the area, as well as infrastructure and services attractive to Millennials. Careful consideration must be given so that the rotating, younger university student population is not excluded, nor overly considered in housing policy recommendations.

The primary source of the difference between median incomes is the significantly larger retired age population in the State. Residents over the age of 65 make up 16.3% of the state's population, but only 9.8% of Columbia's population. The City has a larger under 25 years old population by 3.0% and a larger working age (25 to 64 years old) by 3.6%. Another key age demographic to be aware of is the group approaching retirement relatively soon, those who are 55 to 64 years of age. Again, due to the presence of a large university with over 70 percent of the students living off campus, the City is younger with 9.4% of the population in the 55 to 64 years group compared to 13.1% for the State.

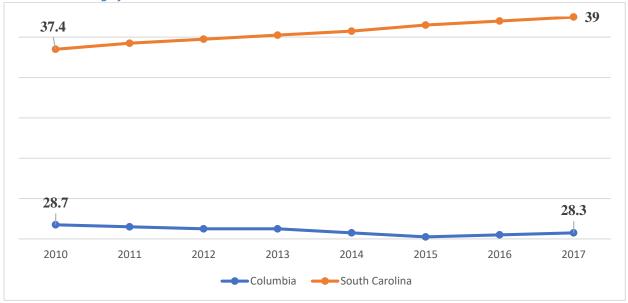
Chart: Age Groups



Source: 2013-2017 American Community Survey 5-Year Estimates (S0101)

The median of age of Columbia has remained remarkably stable since 2010 and has stayed between 28.7 and 28.1 years of age. The statewide rate, on the other hand, has been increasing significantly. The State of South Carolina has increased the median age by 1.6 years since 2010. These trends have been going on since at least 2000 when the median age for the state was 35.4, while it was 28.6 for the city.

Chart: Median Age from 2010 to 2017



Source: 2013-2017 American Community Survey 5-Year Estimates (S0101)

Youth

As noted above, the City of Columbia has a substantial Youth population. While classifying everyone under the age of 25 into one group is convenient for an analysis of the population, it is important to break this group down into smaller subpopulations due to their different needs. Due to data limitations the ages used in each category approximate the members of each group.

Pre-School Age (Under 5 Years)

In many ways, children of this age represent how desirable it is for new parents to live within the City. If this population is relatively small or shrinking, then it is possible that parents view living in nearby jurisdictions as a better option for them. This may be due to lack of desired housing types, prices, and other factors. In 2017, the Pre-School Age population made up 5.1% of the residents of Columbia, or approximately 7,000 children. This is slightly smaller than the statewide population of 5.9%

Children (5 to 14 Years Old)

Members of this group are in elementary and middle school. They generally represent a family that is less likely to move in the coming decade. In Columbia, 8.2% of the population is in this group. This is significantly smaller than the 12.6% of the population at the state level.

High School Age (15 to 19 Years Old)

Youth in this age are considerably more mobile than younger groups but their living situation is generally controlled by their parents. In Columbia, 14.8% of the 2017 population was made up of this age group, or 19,579 people. This population is much smaller at the state level where they represent over 6.6% of the population, primarily influenced by the university student population.

College Age (20 to 24 Years Old)

This population differs considerably from the other members of the Youth subgroup. They are more likely to live in a place of their choosing and may be students from outside the City. The factors that attract college age residents are different than the ones that attract parents with children. This population is also likely to start looking for a place to raise a family and/or become more stable, which requires housing that appeals to that desire. In the City, this population is very large, making up 15.1% of the population. At the state level only 7% of the population is in the College Age group. The university undergraduate and postgraduate segments of the off-campus student population also influence this number.

Overall, it is the older youth demographics that are influencing how large this group is. There are relatively few younger aged youths in the City but if the college age residents decide to stay in Columbia, they may need a living environment that is attractive to child-rearing. As well as a place that has economic opportunities and stability.

Elderly

As noted earlier, the elderly population is relatively small in Columbia, but their needs still must be addressed. People aged 65 and over have particularly important housing needs. As people age, they tend to require new types of social services, healthcare, and housing. As communities across the nation grow proportionately older, the needs of the elderly become an increasingly important aspect of both public and private decision-making. 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.

In 2017, residents 65 years old and older made up 9.7% of the City's population. That represents an increase since 2010 when they made up 9.2% of the population. During this same time period the 75 and older population fell from 4.8% to 4.0%.

The following map shows some interesting residential patterns for elderly residents of Columbia. The highest concentration of elderly residents is in tracts that have seen a significant reduction in their population since 2000. Many of the high growth tracts in in the City's easternmost tracts. In this area, over 20% of the population is elderly in many tracts. Elsewhere in the City, particularly downtown and in the northwest, the elderly population is generally less than 10%. This points to a potential age-based segregation where younger residents live on one side of town while older live primarily on the other side. There are several potential reasons for this divide, including the price and availability of housing that appeals to each population.

Estimated percent of all people 65 or older between 2013-2017.

Percent Population 65 or Year 2013-2017

Standard by Comus Tract, 2010

Source Comus

Source Comus

Represent Population 65 or Year 2013-2017

Source Comus

Source Comus

Represent Population 65 or Year 2013-2017

S

Map: Elderly Population (65 and older)

Source: 2013-2017 ACS via PolicyMap

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.

Columbia has a significantly lower age dependency ratio than the state or nation. Both the oldage and child ratios are substantially lower in the City. This reinforces the previously identified trend of Columbia being a rather young City. This ratio shows that the demand for housing is going to be geared towards a working age population with a lower demand for elderly focused facilities. While the student population influence on the data should be considered, when comparing Columbia to a similar city with a large university, Knoxville, TN and the University of Tennessee (GE RATIO 47.7), Columbia's dependency age ratio is still lower.

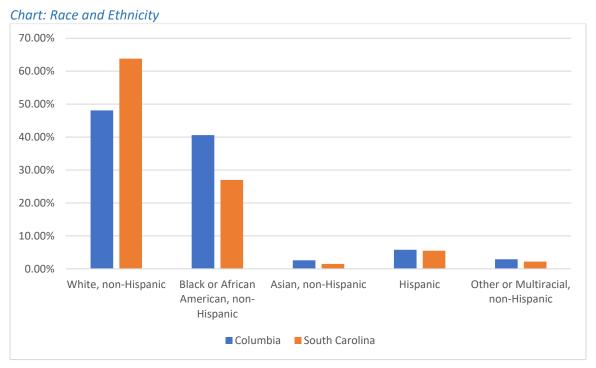
Table: Dependency Ratio

	Columbia	South	United	
		Carolina	States	
Age ratio	35.0	62.7	60.8	
Old-age ratio	13.1	26.4	23.9	
Child ratio	21.9	36.3	36.9	
Source: 2013-2017 American Community Survey 5-Year Estimates (S0101)				

Race and Ethnicity

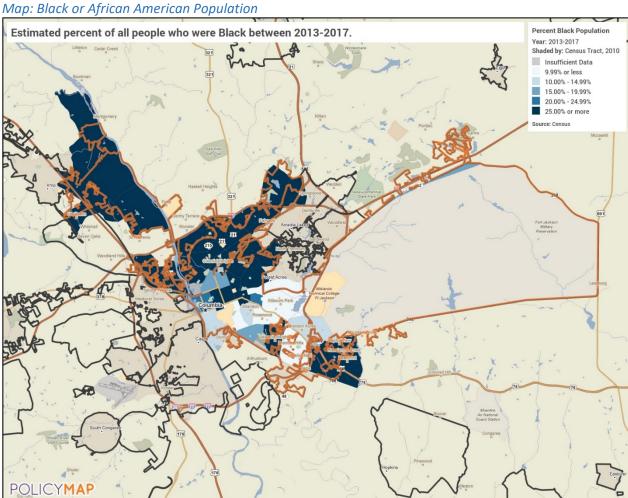
Federal housing policy intentionally racially segregated housing for decades. Those policies, as well as the many local and state discrimination policies, are no longer legal, but many communities still feel the effect of red-lining and other laws meant to segregate racial groups. An unfortunate truth 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.

The City of Columbia is significantly more diverse than the state. White, non-Hispanic residents make up a plurality of Columbia but only 7.5%. The Black or African American population in the City is large and makes up 40%. At the state level, White, non-Hispanic residents are a clear majority with 63.8% of the population. Both the City and the State have a similarly sized Hispanic population, 5.8% and 5.5%, respectively. Of note, 0.1% of the population report they do not speak English at all. While 2.8% report to be able to speak English less than "very well" (3,488 people).

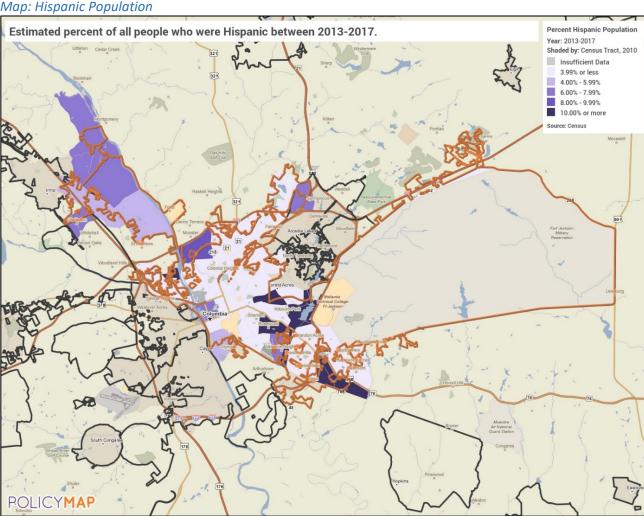


Source: 2013-2017 American Community Survey 5-Year Estimates (S0101)

While the Black population makes up a large proportion of the total population, they are not evenly distributed around the City. There are many tracts where less than 10% of the population is Black or African American. Concentrations of protected classes of people is often linked to economic opportunities and segregation of this type can be problematic.



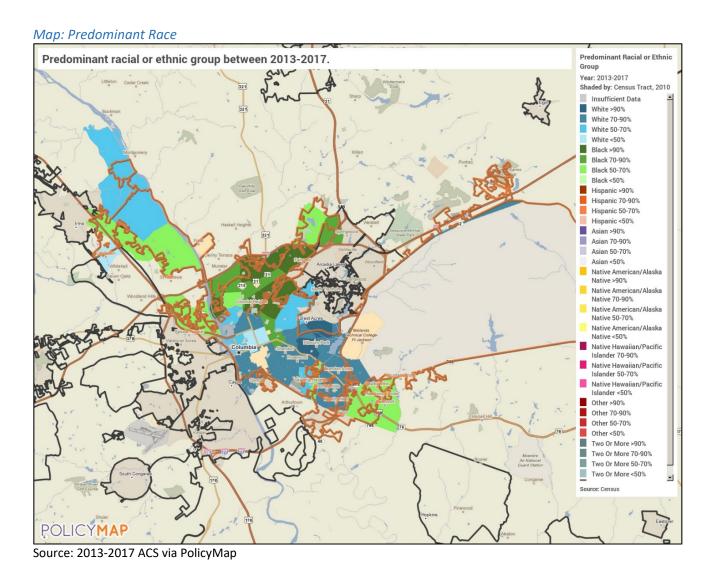
Hispanic residents make up a smaller proportion of the population than White or Black residents, however the population is still substantial. There are clear areas of the City where the Hispanic population is disproportionately large or small. Tracts in the southeastern part of the City have a Hispanic population that is 10% or more of the total, while in many tracts they make up less than 4%.



Source: 2013-2017 ACS via PolicyMap

Diversity

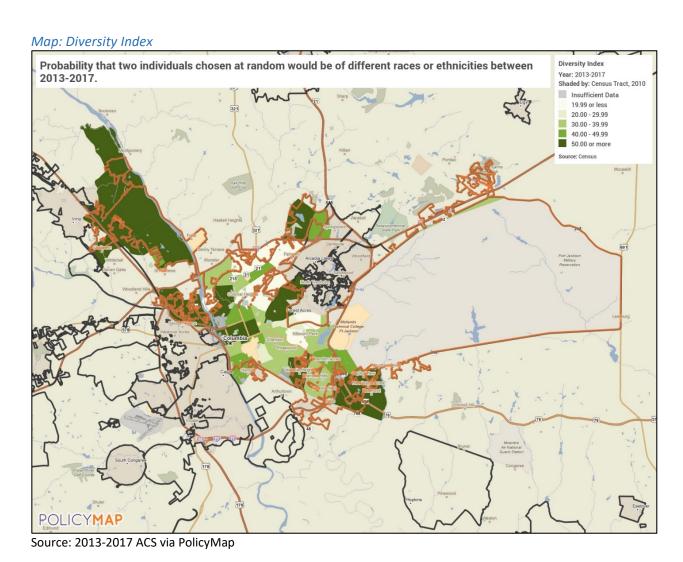
The diversity map below provides a visual representation of the predominant race within the City. This visualization clearly shows that there are areas of town that are predominantly White and areas that are predominantly Black. This racial separation could indicate problematic practices or historical segregation that warrants attention and it should be considered.



The map below displays the Diversity Index ranking for census tracts in the City of Columbia, based on data from Policy Map. As Policy Map explains:

"The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity (diverse). Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers."

The city is overall relatively heterogenous with several diverse tracts. There are a few tracts with incredibly low diversity located in both primarily White and primarily Black areas.



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 addition to having to overcome barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at much higher rates than the average person. An estimated 11.7% of the City of Columbia's population has a disability, over 13,000 people. The disability rate in the City is significantly less than the statewide rate of 14.7%.

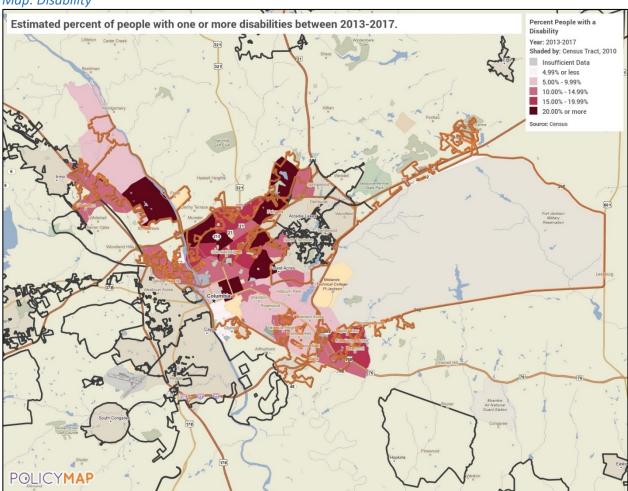
The following table provides data on the number of people with a disability in the City and State broken down by age. As is expected, the elderly experience a higher rate of disability in comparison to other age cohorts. Over half of all residents 75 years and over have a disability while approximately 16.6% of those aged 35 to 64 years old have a disability.

Table: Disability and Age

	Col	umbia	South Carolina		
	Number	Percentage	Number	Percentage	
Persons with a Disability	13,107	11.7%	706,323	14.7%	
Under 5 years old	52	0.8%	2,798	1.0%	
5 to 17 years old	670	4.8%	47,796	6.0%	
18 to 64 years old	7,970	10.0%	372,078	12.7%	
65 years old and older	4,415	36.7%	283,651	36.5%	
Source: 2013-2017 American Community Survey (S1810)					

The map below shows the distribution of people with a disability in Columbia. Like many of the variables studied in this analysis, the concentration of people with a disability is disproportionate across the region. There are many tracts with a high disability rate (20% or over) located in the northern part of the City. Some of these tracts also have a large elderly population but that is not the case in every situation.





Source: 2013-2017 ACS 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, has 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 2017 there were an estimated 7,909 veterans living in Columbia making up 7.7% of the population. Veterans have a significantly higher median household income and lower poverty rate than non-veterans. They are also more likely to be in the labor force and lower unemployment rates. Unsurprisingly, the disability rate is higher for veterans than non-veterans.

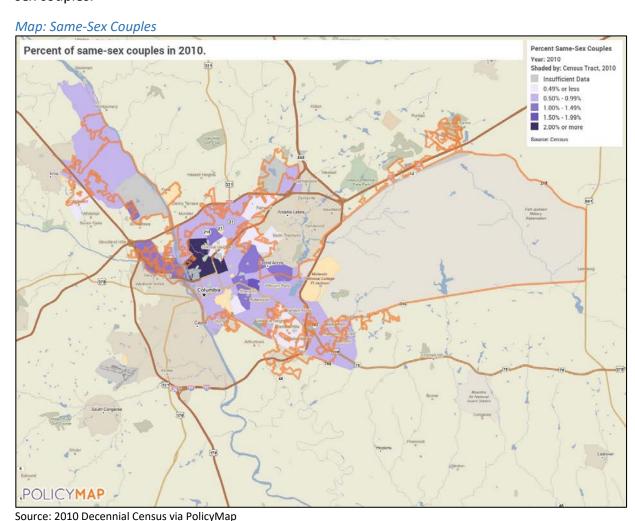
Table: Veterans

	Colu	mbia	South Carolina		
	Veterans	Non-veterans	Veterans	Non-veterans	
Civilian population 18yrs+	7,909	94,318	367,921	3,404,166	
- Percent of population	7.7%	92.3%	9.8%	90.2%	
Median Income	\$36,975	\$20,937	\$37,959	\$24,628	
Labor force participation rate	77.5%	68.4%	75.2%	73.5%	
Unemployment rate	6.6%	8.5%	5.6%	7.3%	
Below poverty in past 12 mo.	11.2%	22.1%	7.0%	15.2%	
With any disability	24.9%	13.7%	29.3%	16.6%	
Source: 2013-2017 American Community Survey 5-Year Estimates (S2101)					

Sexual Orientation and Gender Identity

HUD regulations prohibit discrimination based on sexual orientation and gender identity, but local protection is beneficial to the residents of the City. The U.S. Census Bureau does not ask a person's sexual orientation or gender identity. However, a report by The Williams Institute at UCLA reports that 4.1% of the State's population identify as LGBT. Gathering accurate data is difficult due to stigma and methodological barriers. Lack of adequate legal protections can lead to underreporting and broadly defining orientations can lead to variation among estimates.

One statistic the Census Bureau does record is the number of same-sex couples in a geographic region. During the 2010 Census, approximately 0.81% of the households reported being same-sex couples. This is higher than the Richland County (0.73%), South Carolina (0.64%) and the United States (0.77%). As can be seen in the below map, the distribution of same-sex couples in the City is not uniform. Tracts in the downtown area report over 2% of all households are same-sex couples.



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.

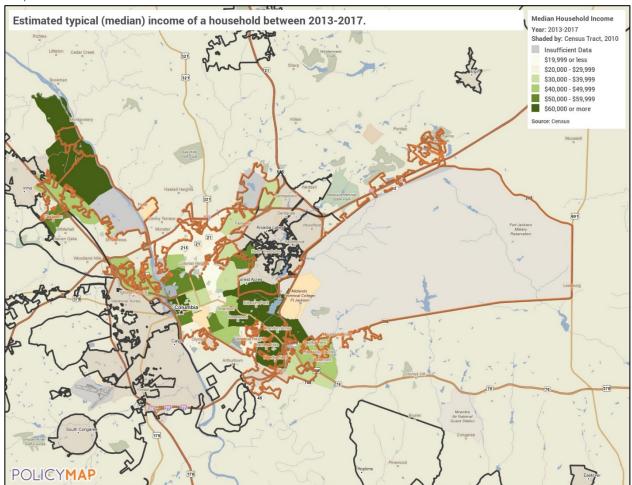
Income

Since 2000, the median household income in the City increased by over 40%, which is faster than the state. However, the statewide MHI is still greater than the City's. While this growth is a positive indicator for both the City and the State, it is important to factor in inflation to get a better idea of the purchasing power of residents. According to the Bureau of Labor Statistics, a resident who earned the MHI in Columbia in 2000 would have the purchasing power of someone who earned \$44,800 in 2017. That means that city residents have slightly less purchasing power now than they did at the turn of the century.

Table: Median Household Income

	2000	2017	% Change		
Columbia	\$31,141	\$43,650	40.2%		
South Carolina	\$37,082 \$48,781 33				
Source: 2000 Decennial Census, 2013-2017 American Community Survey (DP03)					

The following map displays how the MHI in Columbia is tied closely to a person's place of residence. The MHI is not steady throughout the City. Instead, there are areas with a relatively high MHI (\$60,000 or over) located primarily in the southern part of the City and to the far north. Tracts in the central part of the City have a significantly lower MHI, often less than \$20,000. This economic segregation can create significant problems, particularly when the lower income areas are the same as the areas with a large minority population.

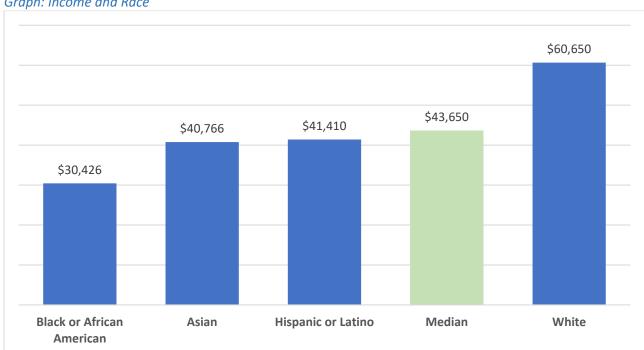


Map: Median Household Income

Source: 2013-2017 ACS via PolicyMap

Income and Race

In the City of Columbia, there is a relationship between a household's median income and race or ethnicity. White households are the only racial or ethnic group with an MHI greater than the average. Black households, which make up a substantial proportion of the population, have an MHI that is over \$13,000 less than the citywide MHI. When an area has a large minority population with a high poverty rate 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 priority for grant fund use.



Graph: Income and Race

Data Source: 2013-2017 American Community Survey 5-Yr Estimates (S1903)

Due to the small population size of the other racial groups an accurate MHI was not available.

Cost Burden

According to HUD, households paying in excess of 30 percent 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.

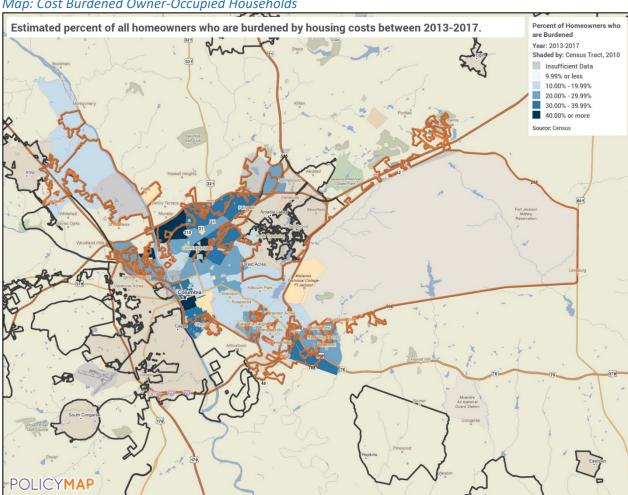
Renters are, by far, the most cost burdened group in the City. Nearly 55% of renters are cost burdened and 45% of renters pay 35% or more of their income to housing costs. Even without considering housing cost burden, renters have greater housing instability and a greater likelihood of needing assistance. 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. Of note, over 73% of the university student population live off-campus, with many in the renter demographic. While many of these students are considered cost burden by HUD standards, it's important to distinguish that they are often in different phase of life that temporarily accepts a certain level of cost burden.

Homeowners have a significantly lower cost burden rate but there are still households within the City who lack the income necessary for economic security. Nearly 25% of homeowners without a mortgage and approximately 13.1% of homeowners with a mortgage are cost burdened. These 4,253 households may need assistance. Homeowners without a mortgage have a particularly low-cost burden rate. However, they also tend to be elderly and may lack disposable income, meaning any increase in housing costs can cause significant problems.

Table: Monthly Housing Costs

	Homeown Mort	ers with a	Homeowners without a Mortgage		Renters	
	Number	Percentage	Number	Percentage	Number	Percentage
Housing units	13,839	100.0%	6,864	100.0%	23,612	100.0%
Less than 20%	6,984	50.5%	5,232	76.3%	5,500	23.3%
20 to 24.9%	2,294	16.6%	427	6.2%	2,637	11.2%
25 to 29.9%	1,204	8.7%	309	4.5%	2,650	11.2%
30 to 34.9%	756	5.5%	134	2.0%	2,200	9.3%
35% or more	2,601	18.8%	762	11.1%	10,625	45.0%
Not Computed	118	(X)	68	(X)	1,597	(X)
Data Source: 2013-2017 American Community Survey 5-Year Estimates (DP04)						

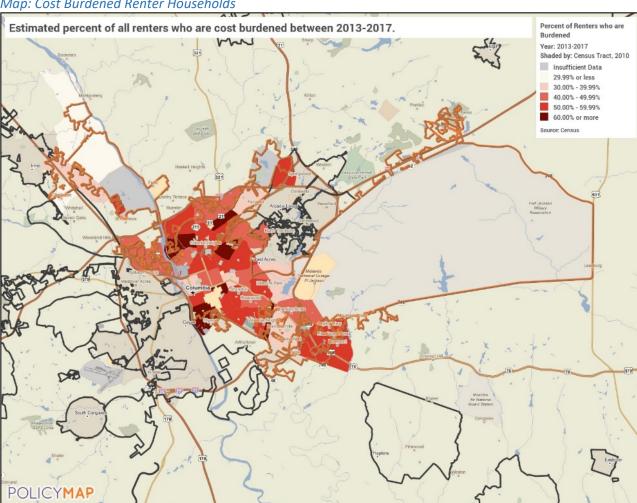
Cost burdened homeowners have a few areas of relative concentration. And are more common in the northern part of the City. These high cost burden tracts for homeowners have a rate of 40% or more.



Map: Cost Burdened Owner-Occupied Households

Source: 2013-2017 ACS via PolicyMap

Cost burdened renters exhibit a different geographic pattern than cost burdened homeowners and do not reveal a pattern of concentration Both high and low-cost burden tracts are common throughout the City.



Map: Cost Burdened Renter Households

Source: 2013-2017 ACS via PolicyMap

Poverty

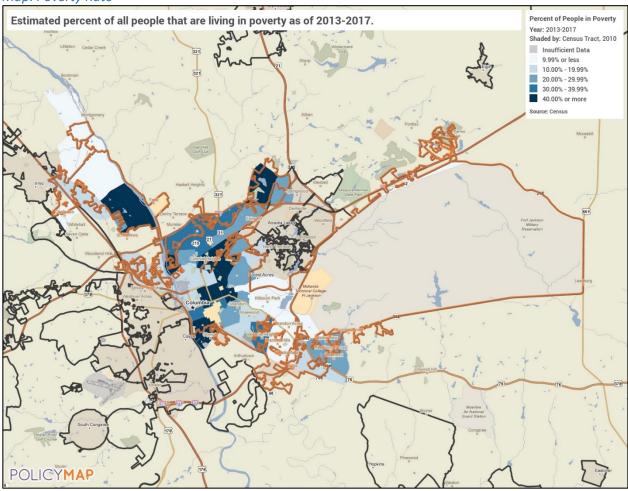
In 2000, the individual poverty rate in Columbia was very similar to the 2017 rate, slightly higher than 22%. The statewide poverty rate has consistently been lower than in Columbia. However, the poverty rate has grown by a significant amount since 2000.

Table: Poverty Rate

	2000	2017	Change in	
			Poverty Rate	
Columbia	22.1%	22.3%	+0.2%	
South Carolina	14.1%	16.6%	+2.5%	
Source: 2000 Decennial Census, 2013-2017 American Community Survey (DP03)				

In Columbia, poverty rates vary significantly throughout the City. Poverty is more highly concentrated in the northern half of the city. Unsurprisingly, the areas with a high poverty rate also tend to have a low median household income. As noted above, if these areas overlap with concentrations of racial minorities it is possible that there are R/ECAPs within the City.

Map: Poverty Rate

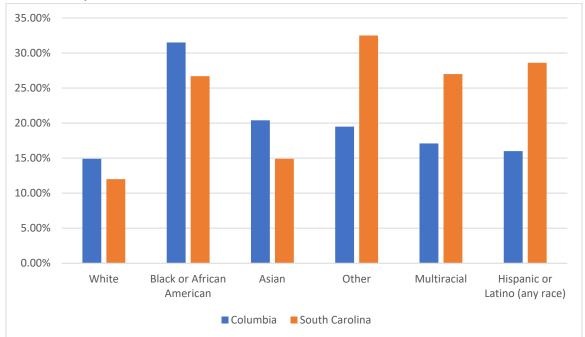


Source: 2013-2017 ACS via PolicyMap

Poverty and Race

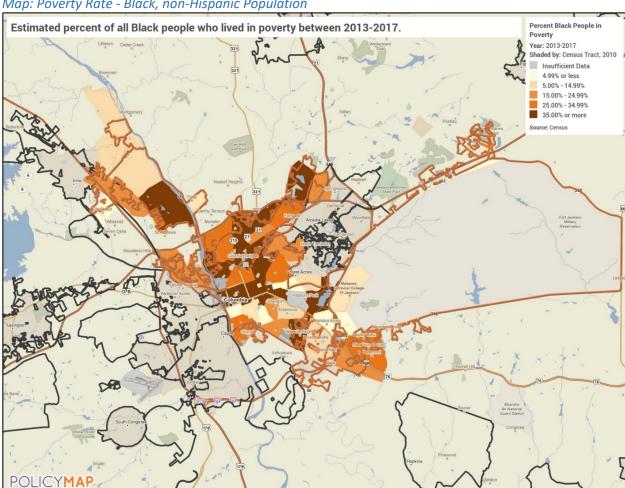
In both the City and the State, the race or ethnicity of a household is correlated with the likelihood they live below the poverty level. For both populations, the only group with a poverty rate lower than the jurisdiction-wide average are White households. For every group with the poverty rate is higher in Columbia than in South Carolina except Native Hawaiian and Other Pacific Islander households. Like previous data points, the relatively small population of some groups created a large margin of error which renders comparing accurately impossible using ACS data. In Columbia, the groups with the largest margin of error are American Indian or Alaska Native (+/-22.5%) and households who classify as a race other than what was presented on the census (+/-12.1%).

Chart: Poverty and Race



Source: 2013-2017 American Community Survey (DP03)

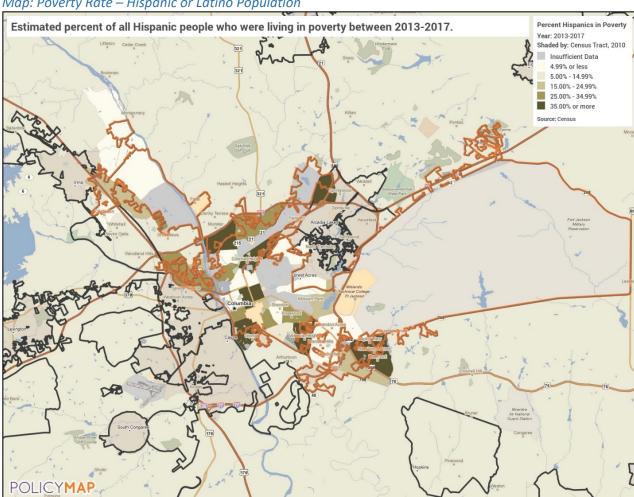
In addition to Black or African American households experiencing poverty at a disproportionate level, there are also tracts in the City where the poverty rate is significantly higher. Throughout Columbia there are tracts where the Black poverty rate is over 35%. On the other end of the spectrum there are tracts with a poverty rate of less than 5% for this group. There is not a strong concentration of either extreme but higher poverty tracts are loosely located in the northern part of the City.



Map: Poverty Rate - Black, non-Hispanic Population

Source: 2013-2017 ACS via PolicyMap

Hispanic households in poverty are also more prevalent in certain tracts than others. Several tracts throughout the City have a poverty rate of 35% or higher while others are much lower. These tracts are not concentrated in a part of the City.

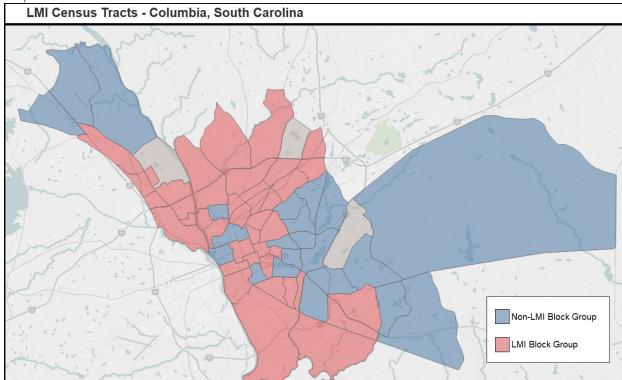


Map: Poverty Rate – Hispanic or Latino Population

Source: 2013-2017 ACS via PolicyMap

LMI Census Tracts

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



Map: LMI Census Tracts

Source: HUD LMISD FY 2018 & FY 2019

Source: HUD LMISD FY 2019

Employment

According to data from the Bureau of Labor Statistics, annual unemployment rates in the City of Columbia have decreased considerably since 2010. On average, the unemployment rate has gone down approximately 0.75% annually. In 2014, the rate remained constant but every other year it declined. This trend is practically mirroring the state-level trend of the same era.

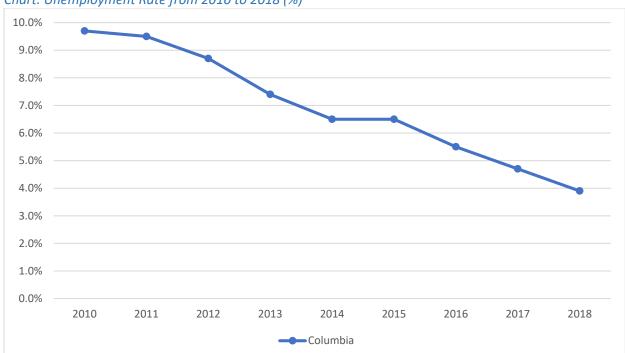


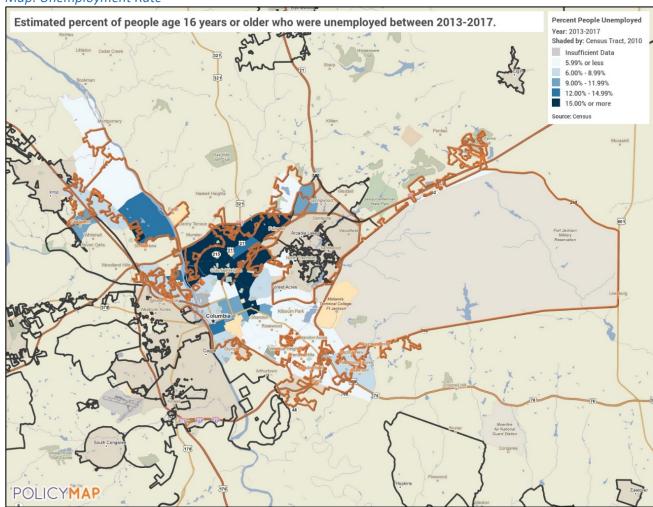
Chart: Unemployment Rate from 2010 to 2018 (%)

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 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 can't be used to identify concentrations within the City.

In Columbia, unemployment is more prevalent in the northern tracts where 15% or more of the population does not have work. This area of the city also has a large Black or African American population. Given the difference in Median Household Income by race it is not surprising to find areas with a low supply of relevant economic opportunities are areas with a large minority population.

Map: Unemployment Rate



Source: 2013-2017 ACS via PolicyMap

Transportation

In Columbia, commuting via personal vehicle is the most common form of transportation. While over 70% of the City's population uses personal vehicles, this rate is significantly lower than the statewide rate of 92%. A relatively large number of residents in the City commute by walking, which is the second largest method by far. The student population and university staff living in close proximity to the college likely impact this number. The only non-personal vehicle method of commuting that is less common in Columbia than the state is working from home, but the difference is small.

Table: Commuting Method

	Columbia	South Carolina
Workers 16 years and over	66,178	2,168,006
Car, truck, or van	70.2%	92.0%
Drove alone	64.3%	82.6%
Carpooled	5.9%	9.3%
Public transportation (excluding taxicab)	1.6%	0.6%
Walked	22.2%	2.2%
Bicycle	0.5%	0.3%
Taxicab, motorcycle, or other means	2.1%	1.2%
Worked at home	3.4%	3.8%
Source: 2013-2017 American Community Survey 5	5-Yr Estimates (S0801)	

The commute time is relatively short for workers in both Columbia and South Carolina, particularly in the City. Most residents spend less than 30 minutes commuting and the largest travel group is those who spend less than 10 minutes commuting. Very few people, only 2.7%, spend an hour or more commuting in Columbia.

Table: Travel Time

	Columbia	South Carolina
Workers 16 yrs.+ who did not work at home	63,910	2,085,473
Less than 10 minutes	32.9%	12.6%
10 to 14 minutes	18.4%	14.3%
15 to 19 minutes	18.5%	16.9%
20 to 24 minutes	12.1%	15.8%
25 to 29 minutes	4.1%	6.7%
30 to 34 minutes	7.5%	14.3%
35 to 44 minutes	2.2%	6.3%
45 to 59 minutes	1.6%	7.2%
60 or more minutes	2.7%	5.8%
Mean travel time to work (minutes)	15.2	24.3
Source: 2006-2010 & 2013-2017 American Commur	nity Survey 5-Yr Estimates (S08	301)

Housing Profile

This section of the AI profiles Columbia's housing market, focusing on affordability. It contains information on housing types, age, occupancy characteristics (renter/owner), vacancy rates, unit sizes, construction activity, and housing cost. The existing housing market will be reviewed followed by an assessment of population demand for housing.

Type and Size

Throughout Columbia, one-unit detached structures make up a slight majority of all housing units. Since 2010, there has only been a small increase in the number of residential units in the City and the demographics of the properties have changed. Nearly all new units were part of a building with 10 units or more, except for 1-unit attached structures. Many property types lost units since 2010, which is why the net gain in housing units was only 265 despite nearly 1,900 new units coming on the market.

HUD defines a single-family structure as a structure with one to four units. Using that definition, over 68% 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. In Columbia, a fair number of units are part of the "Missing Middle" (2-19 units), 28.1%. This points to a reasonable variety of housing options available for residents with families of all sizes.

Table: Residential Properties

	201	0	2017		Growth	Change (%)
	Number	%	Number	%		
1-unit, detached structure	28,525	53.7%	27,966	52.4%	-559	-1.3%
1-unit, attached structure	1,645	3.1%	1,785	3.3%	140	0.2%
2 units	3,835	7.2%	3,613	6.8%	-222	-0.4%
3 or 4 units	3,556	6.7%	3,263	6.1%	-293	-0.6%
5-9 units	4,557	8.6%	4,040	7.6%	-517	-1.0%
10-19 units	3,059	5.8%	4,036	7.6%	977	1.8%
20 or more units	7,338	13.8%	8,108	15.2%	770	1.4%
Mobile Home	530	1.0%	531	1.0%	1	0.0%
Boat, RV, van, etc.	32	0.1%	0	0.0%	-32	-0.1%
Total	53,077	53,077	53,342	53,342	265	
Data Source: 2006-2010 & 201	3-2017 Ameri	can Comn	nunity Survey 5	S-Year Estima	ates (DP04)	

Unit Size

The following table compares unit sizes from 2010 and 2017. In Columbia, there has been a shift towards larger units. The number of available one- and three-bedroom units fell by a total of approximately 1,650 units. There were over 1,000 new units with 4 bedrooms or more, as well as some new units without bedroom sand with two bedrooms.

Table: Unit Size

	201	0	201	7	Change (#)	Change (%)
	Number	%	Number	%		
No bedroom	1,106	2.1%	1,486	2.8%	380	0.70%
1 bedroom	8,247	15.5%	7,458	14.0%	-789	-1.50%
2 bedrooms	17,840	33.6%	18,296	34.3%	456	0.70%
3 bedrooms	19,183	36.1%	18,319	34.3%	-864	-1.80%
4 bedrooms	5,693	10.7%	6,416	12.0%	723	1.30%
5 or more bedrooms	1,008	1.9%	1,367	2.6%	359	0.70%
Total	53,077	100%	53,342	100%	265	
Data Source: 2006-2010 8	& 2013-2017 <i>i</i>	American	Community S	urvey 5-Ye	ar Estimates (D	P04)

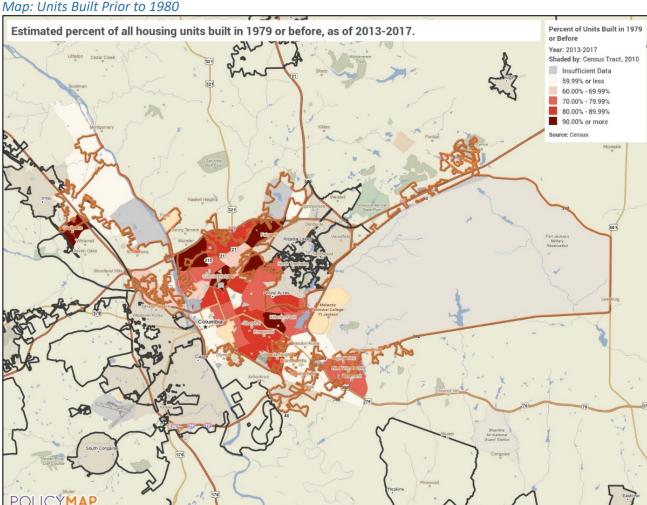
Age of Housing Units

The housing stock in Columbia is relatively old. Less than 5% of the housing units were built after 2009 and the majority were built prior to 1980 Units built prior to 1980 are at risk of having led-based paint in them and require special care during rehabilitation. In Columbia, there nearly 31,500 units making up 58.9% of the stock that are at risk of lead-based paint.

Table: Year Unit Built

	Colur	mbia	South Carolina		
	Number	%	Number	%	
Built 2010 or Later	106,657	4.8%	2,248	4.2%	
Built 2000 to 2009	451,471	20.3%	8,643	16.2%	
Built 1990 to 1999	436,048	19.6%	5,912	11.1%	
Built 1980 to 1989	373,317	16.7%	5,060	9.5%	
Built 1970 to 1979	341,496	15.3%	5,619	10.5%	
Built 1960 to 1969	205,619	9.2%	6,954	13.0%	
Built 1950 to 1959	151,255	6.8%	7,686	14.4%	
Built 1940 to 1949	68,187	3.1%	5,342	10.0%	
Built 1939 or earlier	95,274	4.3%	5,878	11.0%	
Total	2,229,324	100.0%	53,342	100.0%	
Data Source: 2013-2017 A	merican Community S	Survey 5-Year Estimat	es (DP04)		

In Columbia, there are several areas where 90% or more of the homes have a risk of lead-based paint. These neighborhoods along the northern part of the City are also the areas with high unemployment and a concentration of Black or African American households. Geographically, most the city's census tracts have over 70% of the housing stock that was built prior to 1980.



Source: 2013-2017 ACS via PolicyMap

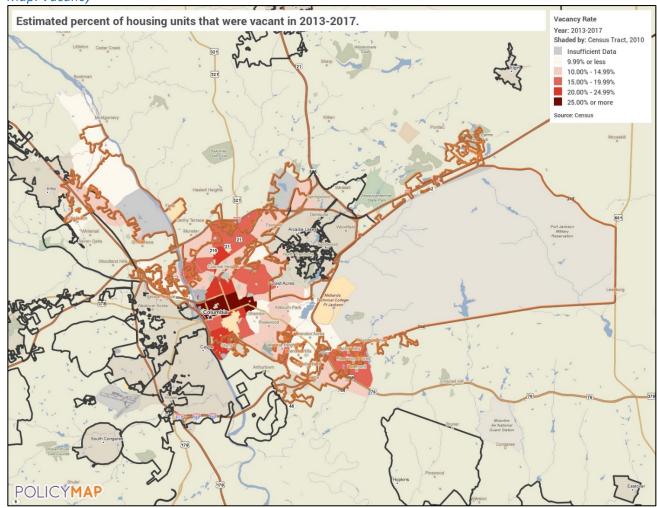
Occupancy Characteristics

Housing occupancy has experienced some change in Columbia between 2010 and 2017. The number of occupied units in the City fell despite an overall increase in population. The reduction in units happened due to fewer owner-occupied units in the City. The number of renter units and vacant units both increased during this time period.

Table: Housing Occupancy						
	2010		2017		Change (#)	Change (%)
	Number	%	Number	%		
Total Housing Units	53,077	100.0%	53,342	100.0%	265	
Occupied Housing Units	46,575	87.7%	46,098	86.4%	-477	-1.3%
-Owner Occupied Units	21,970	47.2%	20,889	45.3%	-1,081	-1.9%
-Renter Occupied Units	24,605	52.8%	25,209	54.7%	604	1.9%
Vacant Housing Units	6,502	12.3%	7,244	13.6%	742	1.3%
Data Source: 2006-2010 & 20	13-2017 Am	erican Com	munity Surve	y 5-Year Esti	mates (DP04)	

Vacant units are significantly more prevalent in the downtown area of the City. The tracts in this area have a vacancy rate of over 25%. This is a stark contrast to the vacancy rate in the southern part of the City and far northwest where less than 10% of the units are vacant.





Source: 2013-2017 ACS via PolicyMap

Construction Activity

Residential construction permits (including duplexes and multifamily) issued in the area varied significantly from year to year with an average of 416 permits annually. In 2013 the fewest number of permits were issued (179). In 2014, the highest number of permits were issued (546).



Chart: Residential Construction Permits

Source: US Census Bureau, Building Permits Survey

The price per unit in Columbia shows that the production of large multi-family properties produces significantly more affordable units. It costs approximately three times as much to produce a unit in a 1-unit property than a unit in a 5+ unit property. Large multifamily properties are relatively common but still only made up approximately 43% of the new building permits. The year with the highest Price Per Unit was the same year that only 1-unit structures were permitted.

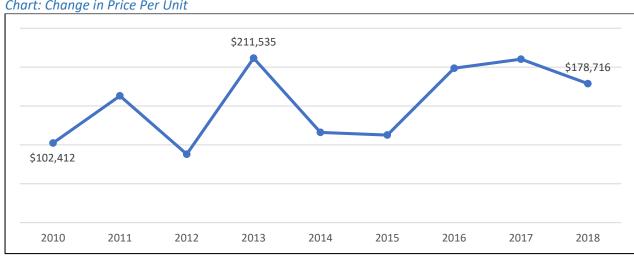


Chart: Change in Price Per Unit

Source: US Census Bureau, Building Permits Survey

Market and Demand

The table below demonstrates the negative impact of the 2007 nationwide housing market collapse on annual housing sales in the Columbia. Since 2005, sales were declining in Columbia but after 2007 the decline accelerated. Homes sales have started to recover and are approaching 2007 levels.

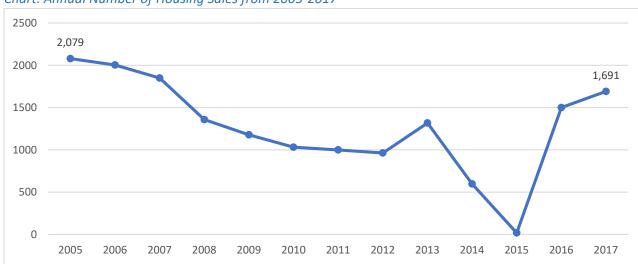
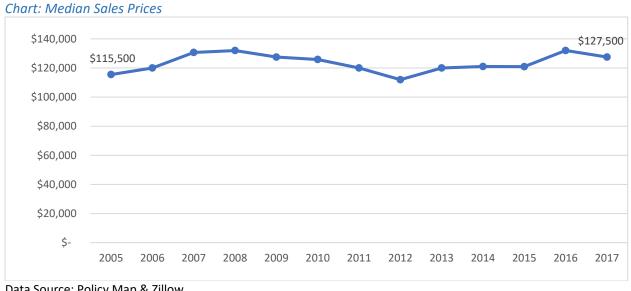


Chart: Annual Number of Housing Sales from 2005-2017

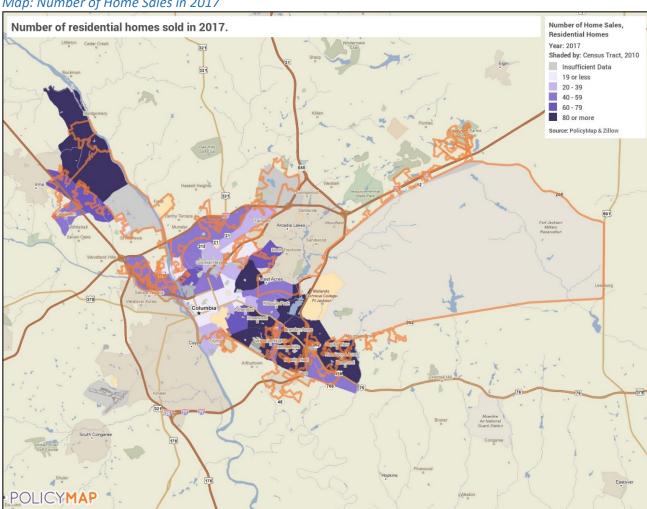
Data Source: Policy Map & Zillow

In general, the median sales price in Columbia has not changed significantly since 2005. The prices have gone up slightly overall but during this time period, they fluctuated around \$120,000. These prices reflect the continued trend of affordability when compared to other cities in the U.S.



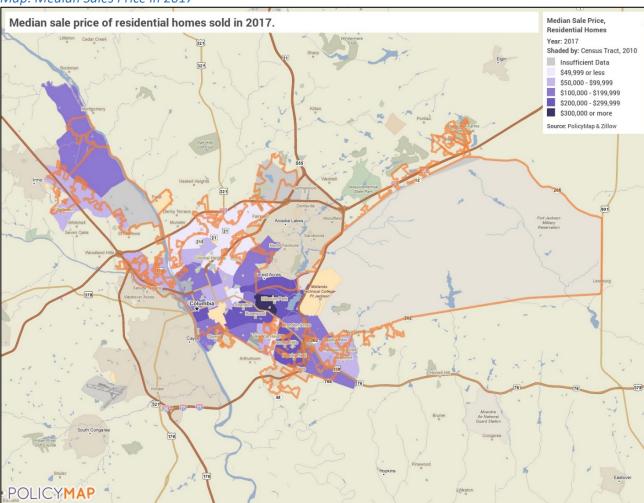
Data Source: Policy Map & Zillow

Tracts in the southern part of the City and along the northwestern side saw the greatest number of homes sold in 2017. These areas sold 80 or more per tract, which is over four times what was sold in the downtown tracts.



Source: Policy Map & Zillow

The southern half of the City had median sales prices that were significantly higher than the northern parts. These areas had median sales prices of over \$200,000 in most tracts, including one tract with a median sales price of over \$300,000. Northern tracts had a much lower median sales price, under \$50,000.



Source: PolicyMap & Zillow

Housing Costs

Owner Occupied

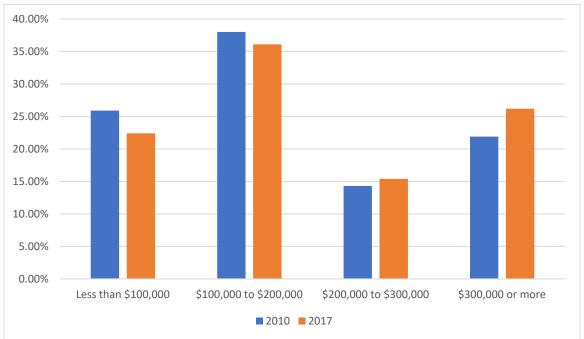
The following section examines data on housing costs for owners and renters across the City between 2010 and 2017. The median home value of owner-occupied units increased by only 8% in Columbia, which is slightly lower than the statewide growth rate of 10.8%. However, housing prices in the City of Columbia are still greater than the median home value for the state. Rising housing costs can create greater economic stability for homeowners but renters will face rising housing costs that may surpass any increases in income they may receive. These increasing costs may price out many residents, particularly low-income households.

Table: Median Home Value

- abiei meaian mome	rarac					
	2010	2017	Percent Change			
Columbia	\$156,100	\$168,800	8.1%			
South Carolina	\$134,100	\$148,600	10.8%			
Data Source: 2006-2010 & 2013-2017 American Community Survey 5-Year						
Estimates (DP04)						

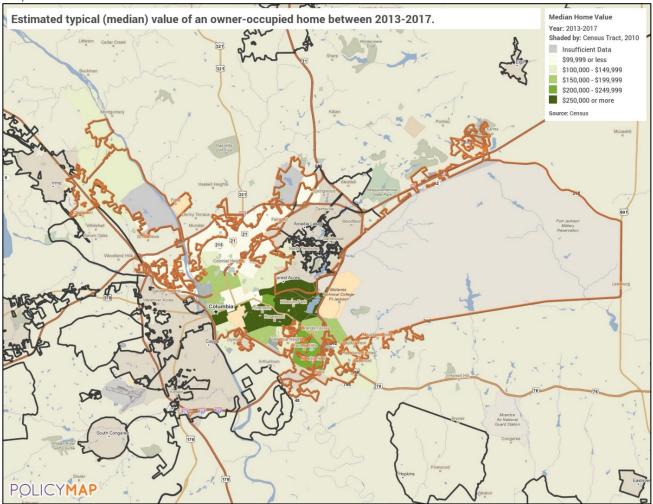
Between 2010 and 2017, the home values in Columbia shifted substantially away from lower valued properties and towards higher valued properties. In 2010, there were over 14,000 units valued at under \$200,000 with homes priced between \$100,000 and \$150,000 the most common price range. By 2017, that number feel to slightly more than 12,000 units. More expensive units have become much more prevalent with 26.2% of units currently valued at over \$300,000, a group that made up approximately 21.9% of the stock in 2010. As noted above, an increase in home values can lead to low-income residents being priced out of the market and can become an impediment to fair housing choice.

Chart: Home Values



Home values are noticeably lower in the northern part of the City. This is the same part of the City that has been previously identified as having a large Black or African American population, high unemployment, and low median household incomes. One of these tracts that have a median home value of less than \$100,000 shares a border with an extremely high median home value tract (\$250,000 or more).

Map: Median Home Value



Source: 2013-2017 ACS via PolicyMap

Rent

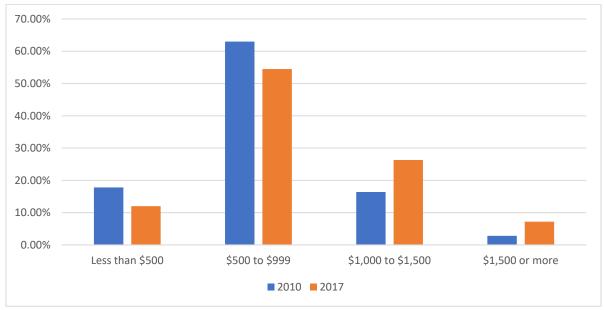
Median contract rents in the City of Columbia have grown at approximately twice the speed as median home value. They also remain higher than the statewide rate. As mentioned previously, renters are more likely to be cost burdened and have housing instability. The number of households who find themselves at risk of losing housing increases with the rising rents and as more renters become cost burdened, they become less likely to be able to transition into home ownership and greater stability.

Table: Median Contract Rent

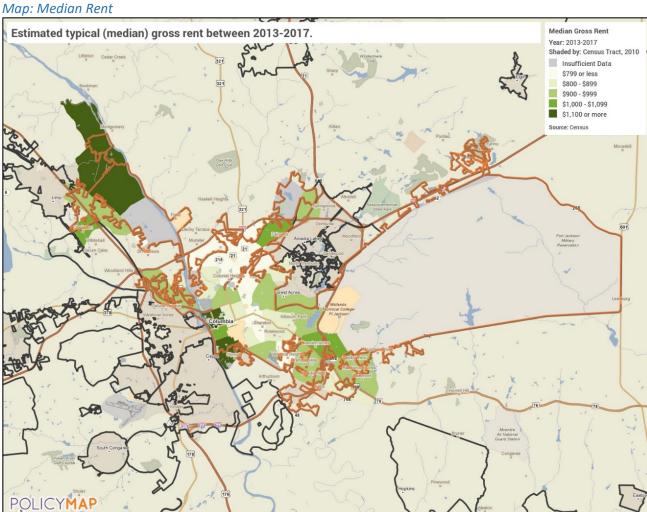
Table: Median Contract Rent						
	2010	2017	Percent Change			
Columbia	\$742	\$878	18.3%			
South Carolina	\$701	\$836	19.3%			
Data Source: 2006-2010 & 2013-2017 American Community						
Survey 5-Year Estima	ites (DP04, B	25058)				

In Columbia, the number of rental units available for less than \$1,000 decreased substantially between 2010 and 2017. In 2010, approximately 80% of all rental units in the City were less than \$1,000 per month, a figure that dropped to 66.5% in 2017. The largest increase was in the \$1,000 to \$1,500 range that currently accounts for over one quarter of all rental units. This reduction in the availability of rental units can create a severe impediment to housing choice for low-income residents.

Chart: Median Rent



In Columbia, high rental costs show a different pattern than high home values. Many areas in the southern portion of the City have high home values but the rents are relatively low. There are only a few isolated tracts where the median rents are extremely high, over \$1,100.



Source: 2013-2017 ACS via PolicyMap

Public Sector Analysis

Overview

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, 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.

The Fair Housing Acts of 1968 and 1988, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances segregate uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

Zoning ordinances aimed at controlling the placement of group homes is one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless and special needs groups have filed complaints against restrictive zoning codes that narrowly define "family" for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. The 'group home' arrangement/environment affords many persons who are disabled the only affordable housing option for residential stability and more independent living. By limiting the definition of "family" and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

The unfortunate reality is that segregation and the lack of access to affordable housing is in large part due to public policies. The federal government enacted regulations and legislation that both explicitly and implicitly prevented racial and ethnic minorities from accessing living areas that had access to jobs and high-quality schools. Local jurisdictions are still working to remove these previous barriers and to correct historic wrongs.

This section highlights many of the different methods that are being used to increase affordable housing and to deal with segregation. Whether it is legislation, enforcement, grants, or encouraging private investment, local governments play a vital role in ensuring that growth and prosperity in the community reaches everyone and not just a privileged few.

Property Tax

Across the Country, older communities-with the support of the Federal government have begun to invest in economic and community development programs designed to revitalize their urban cores. Columbia is no exception. The foundation upon which this kind of development is built is the ability to achieve fairness in the appraisal process within these neighborhoods. Since the starting point for most bank appraisals is the tax department, discriminatory assessment practices can undermine a homebuyer's ability to secure mortgage financing in an amount commensurate with the property's true market value. Furthermore, local property taxes play a significant role in the overall cost of housing. Prohibitively high tax rates can make an area unattractive to developers of affordable housing and can result in elevated housing costs.

Although the Fair Housing Act specifically prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes, no practical means exist to investigate violations of this kind. One reliable approach, however, is to review, periodically, the assessment policies and practices of the taxing jurisdiction since their valuations generally comprise the bases for private appraisals.

Property tax assessment discrimination against low-income groups occurs when lower value properties and/or properties in poorer neighborhoods are assessed for property tax purposes at a higher percentage of market value, on average, than other properties in a jurisdiction. Regressive assessments (the tendency to assess lower value properties at a higher percentage of market value than higher value properties) are not uncommon in this Country. They result from political pressures, practical problems in assessment administration and the use of certain inappropriate appraisal techniques. Assessments tend to remain relatively rigid at a time when property values are rising in middle income neighborhoods and are declining or remaining at the same level in low-income neighborhoods.

Inequities in property tax assessments are a problem for both lower-income homeowners and low-income tenants. Millions of low-income families own homes. Variations in assessment-to-market value ratios between neighborhoods or between higher and lower value properties can make a difference of several hundred dollars or more each year in an individual homeowner's property tax bill. In addition to causing higher property tax bills, discriminatorily high assessment levels can also have an adverse impact upon property values. Buyers are less likely to purchase a property if the property taxes are perceived as too high thereby making the property less attractive and reducing its market value.

Another common inequity is the assessment of multifamily dwellings at a higher ratio to market value than single family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live in multifamily rental dwellings. The requirement to pay a higher

assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain property within the limits of the property's rent structure leading to substandard housing conditions.

Most jurisdictions rely heavily on a market value approach to determining value when conducting their property assessment appraisals. Under this approach, an appraiser compares recent sale prices of comparable properties within the area - in addition to site visits and a good deal of expert speculation - in arriving at an appraised value. The limitations inherent in market value approaches are many. Most prominent among them are the cumulative result of decades of discriminatory valuations, especially where the neighborhood is a minority one. Unless some radical re-appraisal process has been conducted within the preceding 10-year period, the present market value approach merely compounds past discrimination.

While the market value approach may operate successfully in some jurisdictions, a substantial percentage of jurisdictions rely primarily on a replacement cost approach in valuing properties. Making determinations of value based on comparable sales is a complex task, which requires considerable exercise of judgment. Assessor's departments, which must appraise every property within a jurisdiction, often do not find it feasible to make the detailed individual analysis required to apply the market value approach.

There are three elements to South Carolina's property tax system: (1) the tax rate; (2) the assessment ratio; and (3) the property value. For residential uses, the assessment ratio is 4% for owner-occupied buildings (principal residences) and 6% for other residential uses (non-principal residences). The tax rate is generally reflected in "mills," or "millage rate." A mill is a unit of monetary value equal to one tenth of a cent or one thousandth of a dollar. For example, a tax rate of 150 mills translates into \$.15 tax per \$1.00 of assessed value. In general terms, the appropriate tax or millage rate for a taxing entity is reached by dividing the assessed value of all property to be taxed into the revenues needed to be generated by the property taxes. Therefore, if an area is densely populated or includes major tax contributors, then the millage rate is likely to be lower than in an area with sparse development and few industries or major commercial businesses.

Because individual property taxes are determined by multiplying the value of the property by the assessment ratio and then by the tax rate (millage), the millage rate is a determining factor in how high taxes will be on residential properties. Columbia is located in both Richland and Lexington County so the millage will differ depending on location.

Table: Richland County Millage Rates - City of Columbia

Description	Millage
County Base Millage Rate	.12760
Municipal Millage (Columbia)	.09380
Lexington 5 School District	.33230
Richland 1 School District	.33050
Richland 2 School District	.43570

Table: Lexington County Millage Rates - City of Columbia

Description	Millage
County Base Millage Rate	.08334
Municipal Millage (Columbia)	.09380
exington 1 School District	.41240
exington 2 School District	.23022
exington 3 School District	.35748
exington 4 School District	.43169
exington 5 School District	.33230

Because vacation homes and rental units are not primary residences, the owners must pay the 6% tax assessment ratio. This equates to a tax bill that is significantly higher by approximately 50% than the rate paid by units that are the principal residence of the owner. This higher tax rate is often passed on to renters via monthly rent payments. This higher tax rate constitutes an additional burden on lower income families who cannot afford to purchase a home and must rely on rental housing.

The State of South Carolina has several tax abatements programs in place for special segments of the population. The most significant program is the Homestead Exemption for residents over 65 years of age, for disabled persons, and for some Veterans (see below). The provision allows a yearly exemption of \$50,000 from the appraised value of a primary residence. Owner-occupied legal residences are also exempt from school taxes for the first \$100,000 in property value.

Veterans who are totally and permanently disabled from a service-related disability are exempt from state taxes on their primary dwelling and lot up to one acre. This exemption is also allowed for the surviving spouse of the veteran or the surviving spouse of a military member or law enforcement officer killed in action in the line of duty. The exemption applies to the primary home and lot that the eligible member owned at the time of his/her death, as long as the spouse does not remarry, resides in the dwelling, and obtains by legal device the fee or life estate in the dwelling. An exemption from all state taxes is also provided to paraplegic or hemiplegic (a person who has paralysis of one lateral half of the body resulting from injury to the motor centers of the brain) residents for a primary dwelling and lot up to one acre in size. The exemption is also allowed to the surviving spouse of the individual provided the spouse does not remarry, resides in the dwelling, and obtains by legal device the fee or a life estate in the dwelling.

In addition, all properties belonging to nonprofit housing corporations devoted exclusively to providing below-cost housing for the aged and/or for disabled persons are exempt from State taxes. Housing types include supportive housing, rental housing, and cooperative housing

Property taxes can have a strong impact on both owners and renters. Owners will pay taxes on their property, while renters have property tax pushed on to them by the property owners. Property taxes in South Carolina are some of the lowest in the nation, which is relatively good for homeowners, but many renters live in an owner's "second home" which has a higher tax rate that is pushed on to renters. In 2019, The median property tax in South Carolina is \$689 per year for a home worth the median value of \$137,500. Counties in South Carolina collect an average of 0.5% of a property's assessed fair market value as property tax per year. Richland County has a higher median tax rate of 0.76% and a median amount paid of \$1,111. Lexington's median tax rate is 0.57% and median amount paid is \$779 a year. As a reference, the median property tax paid in the United States is \$2,375. (Source: TaxRates.org, 2020)

Zoning and Site Selection

Zoning may have a positive impact and can help to control the character of the communities that make up a City. In zoning a careful balance must be achieved to avoid promoting barriers to equal housing.

In considering how zoning might create barriers to fair housing, four key areas were reviewed; these included the following which were selected because of the possible adverse effects they could have on families and persons with disabilities.

- Definitions used for "families" and "group homes"
- Regulations (if any) regarding group homes

- Ability for group homes or other similar type housing to be developed
- Unreasonable restrictions on developing multifamily units (ex. lot size requirements)

While the definition of group care facility is broader in terms of the number of people that can be served and not limited related to temporary disability, group housing is much more restricted in where it is permitted under current zoning designations. Family care homes are permitted under all single-family zoning districts as well as all multifamily and office use districts, neighborhood business districts (light commercial), agriculture districts and mixed-use districts (traditional neighborhoods). Group homes, on the other hand, are not permitted in any single-family zoning districts and are only permitted in the highest density multifamily residential districts and commercial, office and public and institutional districts. This serves to limit group homes located in single-family and low-density multifamily districts to only small-scale homes (six persons or less) that serve those with temporary disabilities. Generally, the concept of group homes is to integrate them into neighborhoods, providing the maximum amount of independent living in a community-based environment. For example, those group homes that serve persons with permanent disabilities and/or more than six occupants, this neighborhood integration may be unattainable in some communities based on zoning restrictions.

Columbia's land use plan requires that adequate public facilities be available for any development activities. In this context, "adequate public facilities" generally refers to governmental strategies for assuring that all infrastructure required to meet the service demands of a particular development is available as development occurs. Such strategies can, where permitted by law, require that the costs for all or a portion of such infrastructure be borne by the developer (ultimately the consumer), and not the general public. Currently, the City's policy is that all streets, water, sewer and storm drainage facilities within a subdivision, including any required water quality retention ponds, are paid for by the developer.

The ability to provide affordable housing to low-income persons is often enhanced by an entitlement grantee's willingness to assist in defraying the costs of development. Effective approaches include contributing water, sewer or other infrastructure improvements to projects as development subsidies or waiving impact and other fees. These types of approaches help to reduce development costs and increase affordability allowing developers to serve lower-income households. Columbia has historically sought to defray development costs by utilizing CDBG for targeted infrastructure and HOME funds to encourage affordable housing.

Columbia Planning, Design, and Zoning Commissions

The Columbia Planning Commission (Nine members), Design Development Review Commission (Seven members) and Board of Zoning Appeals (Five members) are key organizations in the

effective administration of the Zoning Ordinance and ensuring orderly development of the City's historic districts, urban design areas, and upon designated landmarks.

Community Development Block Grant (CDBG)

Grants 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 urban 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. Columbia has been an entitlement community for over four decades and receives its CDBG allocation directly from HUD.

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

Home Investment Partnership Program (HOME)

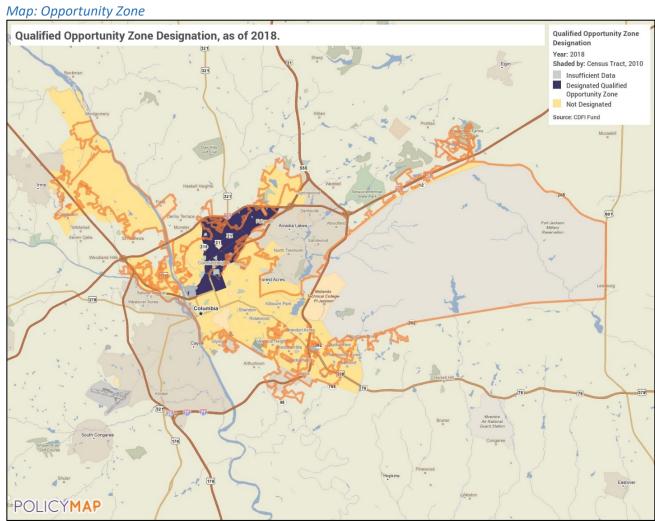
Grants awarded for the development and rehabilitation of affordable rental and ownership housing for low income households. The HOME Investment Partnership (HOME) program is used to assist in developing affordable housing strategies that address local housing needs. HOME strives to meet both the short-term goal of increasing the supply and availability of affordable housing and the long-term goal of building partnerships between state and local governments and nonprofit housing providers. Columbia receives its HOME funding directly from HUD.

Housing Opportunities for Persons with AIDS (HOPWA)

Grants awarded to design long-term comprehensive strategies for meeting the housing needs of low-income people living with HIV/AIDS. (Columbia receives HOPWA funds from HUD and administers the Program regionally for Calhoun, Fairfield, Kershaw, Lexington, Richland and Saluda Counties).

Opportunity Zones

In December 2017 the Tax Cuts and Jobs Act was signed into law. Part of that legislation was the Opportunity Zones Program which intends to provide tax incentives to investors to reinvest capital gains into communities in need. Using the metric outlined in the legislation, the state of South Carolina identified several Opportunity Zones in Columbia. These areas are located primarily in the northern area that is high poverty, low income, and a large minority population.



Source: Community Development Financial Institutions Fund, US Department of the Treasury via PolicyMap

Affordable Housing Needs and Activities

The Columbia Community Development and Housing Programs are designed to implement various housing assistance strategies that include rehabilitation and down payment assistance. The City's community and neighborhood development activities are designed to:

- Assist with neighborhood improvement projects
- Assist homeowners, including elderly and disabled
- Provide housing rehabilitation
- Help LMI residents acquire needed information, knowledge and skills
- Provision of public services

The City's community and neighborhood development activities are designed to assist with neighborhood improvement projects, provide public services, help low- to moderate-income residents acquire needed information, knowledge and skills to build their capacity, and enhance the provision of public services.

- Housing and neighborhood improvement needs and activities are described 2020-24 Consolidated Plan's Strategic Plan sections.
- Provide HOME and CHOO funding to a non-profit organization designated as a Community Housing Development Organization (CHOO) to undertake an eligible HOME activity.
- Housing assistance for AIDS victims in Calhoun, Fairfield, Kershaw, Lexington, Richland and Saluda Counties in support of the HOPWA Program.

Private Sector Analysis

Lending Practices

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. Forprofit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent 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.

The following analysis is provided for the City of Columbia, South Carolina summarizing 2017 HMDA data and data between 2007 and 2017 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2017 City Overview

In 2017, there were approximately 9,500 applications within Columbia for home loans to purchase, refinance or make home improvements for a single-family home - not including manufactured homes. Of those applications, 4,735 or 50 percent were approved and originated. This represents a 7 percent decline of total originations relative to 2016, while the national total decreased 13 percent. Of the remaining 4,773 applications, approximately 1,450 or 15 percent of all applications were denied. The top two application denial reasons within the City were credit history (35 percent) and debt-to-income ratio (24 percent), representing nearly 60 percent of the City's total denials. Lack of collateral and incomplete applications represented 16 percent and 8 percent of denials respectively. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the 3,326 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 some instances the application may have been withdrawn by the applicant.

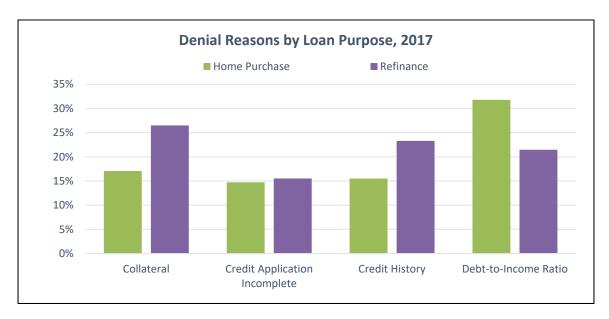
Disposition of Application by Loan Type and Purpose, 2017 Single Family Homes (excluding manufactured homes)

, , , , , , , , , , , , , , , , , , , ,	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	3,308	2,021	503
	FHA	1,459	591	28
	VA	806	747	25
	FSA/RHS	17	3	0
Loans Originated				
	Conventional	1,943	911	214
	FHA	748	190	4
	VA	445	257	12
	FSA/RHS	10	1	0
Loans Approved but Not Acc	epted			
	Conventional	96	70	14
	FHA	32	37	1
	VA	13	30	0
	FSA/RHS	0	0	0
Applications Denied				
	Conventional	295	413	221
	FHA	127	128	12
	VA	67	176	7
	FSA/RHS	1	0	0
Applications Withdrawn				
	Conventional	388	310	43
	FHA	101	105	8
	VA	70	126	1
	FSA/RHS	1	1	0
Files Closed for Incompleten	ess			
	Conventional	92	145	6
	FHA	25	56	1
	VA	10	93	2
	FSA/RHS	0	0	0

Source: 2017 HMDA

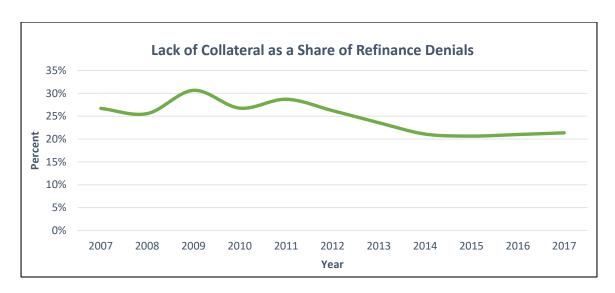
A further examination of the 1,447 denials within Columbia during 2017 indicates that approximately 50 percent were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The top reason for refinance application denials was lack of collateral at 26 percent. Refinance applications were more likely to be denied for lack of collateral

compared to home purchases, while home purchase applications were more likely to be denied for debt-to-income ratio.



Source: HMDA

Typically, homeowners, seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this could indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as "under-water" or the borrowers are "upsidedown" in their mortgage. Shown below, the percentage of refinance denials given for the reason of lack of collateral has declined since the peak of the housing crisis, from 31 percent in 2009 to 21 percent in 2017. This trend suggests that the number of "under-water" homes in Columbia has declined since 2009.



Source: HMDA

Home Purchase Lending in Columbia

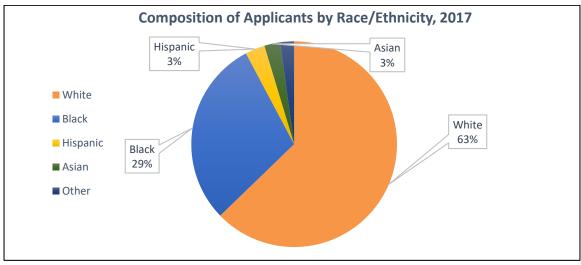
Of the home purchase loans for single family homes that were originated in 2017, (3,146 loans originated) approximately 59 percent of these originations were provided by conventional lenders, slightly lower than the national conventional home purchase share of 64 percent. The remaining 38 percent of home purchase loans in Columbia were provided by federally backed sources including the Federal Housing Administration (FHA) at 24 percent of all home purchase originations, the Department of Veterans Affairs (VA) at 14 percent. Nonconventional loans, including the FHA and VA lending programs, have relatively lower down-payment requirements in comparison to conventional lenders. The FHA and VA lenders also have lower approval rates compared to conventional lenders.

Home Purchases by Type, 2017

	Originations	Share of Total
Conventional	1,943	61.8%
FHA	748	23.8%
VA	445	14.1%
FSA/RHS	10	0.3%
Total	3,146	

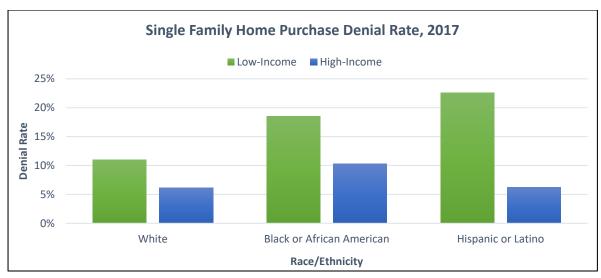
Source: HMDA

The share of applications and percentage of loan application denials for traditional home purchase loans in Columbia varies by race/ethnic groups. The majority of applicants in 2017 were non-Hispanic Whites at 63 percent, followed by Black applicants at 29 percent. Hispanic and Asian applicants each represented 3 percent of all home purchase applications. In 2017, Whites were least likely to be denied for conventional single-family home purchases, being denied at a rate of 6 percent. Hispanics were denied at a rate of 11 percent, while Black applicants faced the highest conventional home purchase denial rate at 26 percent.



Source: HMDA

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Columbia, shown below, demonstrates that High Income Blacks (having greater than 120 of Area Median Income) were nearly just as likely to be denied for a single family home purchase, at 11 percent, as Low Income Whites (having less than 80 percent of Area Media Income), at 10 percent. Additionally, Low Income Hispanics were the group with the highest home purchase denial rate at 23 percent. High Income Whites were denied at a rate of 6 percent, the lowest of all groups examined.

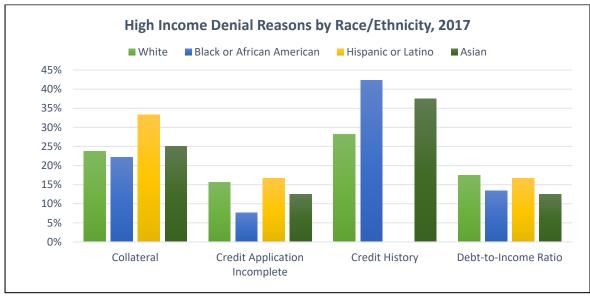


Source: HMDA

Application Denial Reasons by Income Group

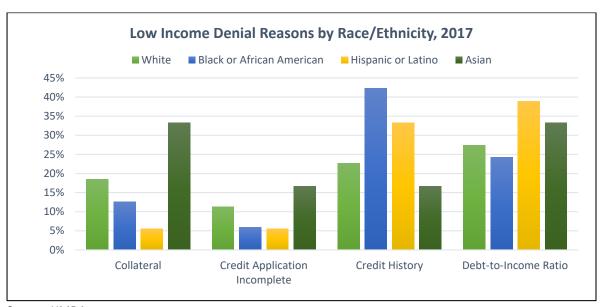
The below charts compare denial reasons among White, Black, Hispanic, and Asian applicants for 2017 by income group.

As of 2017, the leading denial reason for High Income White and Black applicants was credit history, while lack of collateral was the top reason for Asians and Hispanics. High Income Blacks were more likely to be denied credit relative to the other groups.



Source: HMDA

For Low Income denials, the top reason for White and Black applicants was also credit history. All Low-Income groups were denied for debt-to-income ratio at a higher rate than their High-Income counterparts.

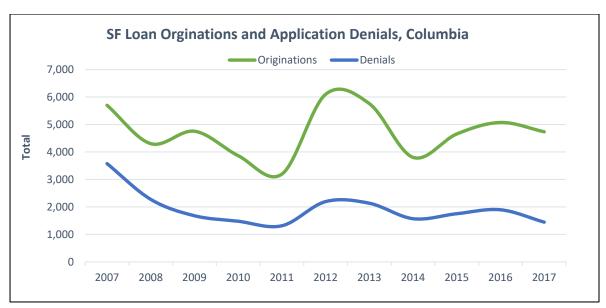


Source: HMDA

Columbia's Single-Family Lending Market, 2007-2017

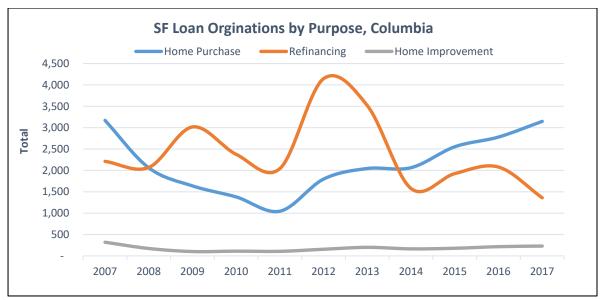
The following section will examine HMDA data over the time period 2007-2017 for Columbia. Highlighted below, the number of single-family loan originations followed a dynamic trajectory between 2007 and 2017. At the onset of the housing crisis, originations declined 25 percent between 2007 and 2008, followed by a 33 percent decrease between 2009 and 2011 after a mild uptick between 2008 and 2009. Between 2011 and 2012, originations grew by over 90 percent, reaching over 6,000 total originations. Loan originations then fell by 38 percent between 2012 and 2014, though grew steadily between 2014 and 2016. Between 2016 and 2017, originations fell by 7 percent, and as of 2017, total originations are about 83 percent of the level prior to the housing crisis.

In contrast to originations, the number of application denials within Columbia demonstrated fewer extreme changes between 2007 and 2017. As of the most recent data year, denials are 60 percent below the level experienced in 2007. Relatedly, the share of denials as a percent of total originations and total denials has declined markedly since the housing bust, from 39 percent in 2007 to approximately 24 percent as of 2017.



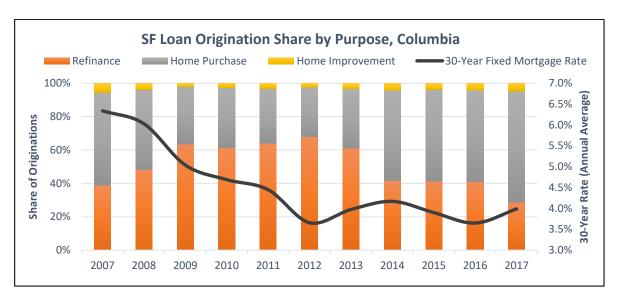
Source: HMDA

Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2017 were the result of refinancing originations. Though home purchases were the top loan purpose in 2007, refinancing became the dominant loan purpose between 2008 and 2013, and in particular 2012 as interest rates were broadly falling, discussed further below. In 2014, home purchase surpassed refinances as the top loan purpose and as of 2017 home purchases comprised two-thirds of the City's total originations. The 3,146 home purchase loans originated in 2017 is the highest annual total since 2007 and the growth of home purchase originations since 2011 (doubling between 2011 and 2017) reflects a steady and recovering demand for housing within the City.



Source: HMDA

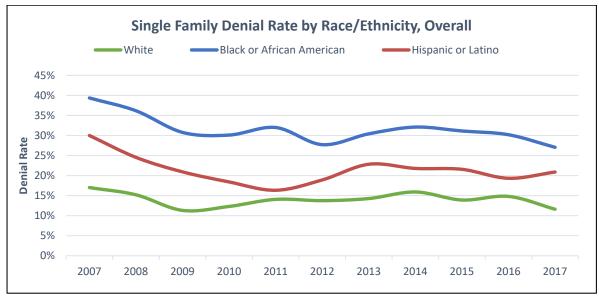
The share of refinance originations in Columbia appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest level in both absolute number and percentage terms of all data years analyzed. Similarly, when interest rates rose between 2012 and 2014, the share of refinance originations fell from 68 percent to 41 percent. The increase in the annual average of the 30-year fixed mortgage rate between 2016 and 2017 is consistent with Columbia's 35 percent reduction in the number of refinance loan originations over the same time period.



Source: HMDA, Federal Reserve Bank of St. Louis

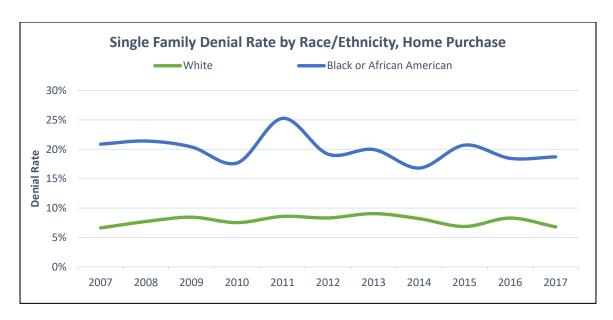
Income, Race, and Single-Family Loan Denials in Columbia

Denial rates for single family loans in Columbia over time vary by race and ethnicity. The chart below shows that between 2007 and 2017, White applicants were the least likely to be denied relative to other groups for every year examined. During the same time period, Black applicants were the most likely to be denied relative to other groups. As of 2017, Black applicants were more than twice as likely to be denied as White applicants. The overall denial rate for all groups has fallen during the analysis period.



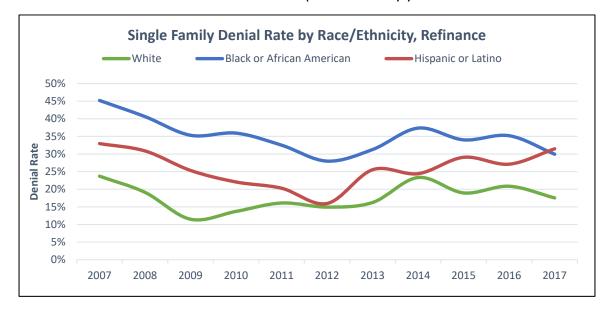
Source: HMDA

Home purchase applications show similar trends as the overall rate, as Whites were the least likely to be denied during the years analyzed (Asian and Hispanic data was excluded to due variability of sample size over the years analyzed). Black applicants are more than 2.7 times more likely to be denied for a home purchase relative to Whites as of 2017.



Source: HMDA

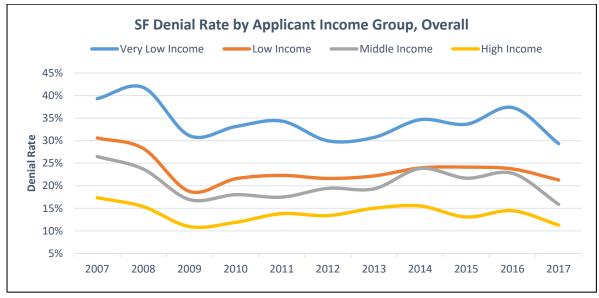
Similar to the overall denial rate and home purchases, White applicants were less likely to be denied a refinance relative to Blacks and Hispanics in every year between 2007 and 2017.



Source: HMDA

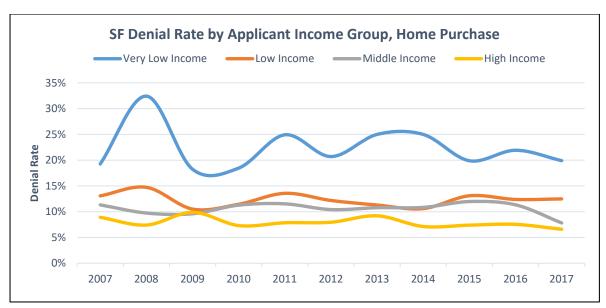
A view of single-family denial rates by applicant income group within Columbia, highlighted below, shows the expected outcome of higher income groups experiencing lower denial rates than lower income groups. However, Very Low-Income applicants (50 percent of less of Area Median Income) have remained well above other income groups, despite a decrease between

2016 and 2017. As of 2017, High Income (greater than 120 percent of Area Median Income) and Middle Income (80 to 120 percent of Area Median Income) applicants are the lowest and second-lowest denied groups respectively, with Low Income (between 50 percent and 80 percent of Area Median Income) the third lowest. The single-family denial rate declined for all income groups between 2007 and 2017.



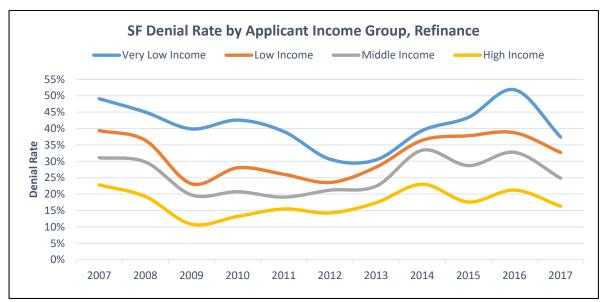
Source: HMDA

Similar to overall denial rates by income group, home purchase applications were denied at a higher rate for Very Low-Income applicants between 2007 and 2017 while Low, Middle, and High-Income applicants have remained closer to each other. As of the most recent data year, Very Low Applicants are more than three times as likely to be denied for a home purchase relative to High Income applicants.



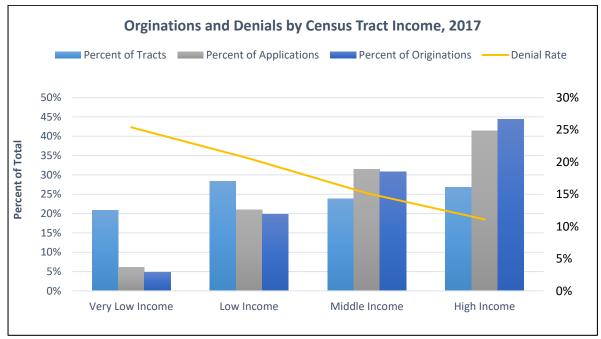
Source: HMDA

For all income groups, denial rates for refinance applications are higher than overall denial rates as well as those for home purchases. Additionally, the refinance denial rate for all income groups declined between 2016 and 2017.



Source: HMDA

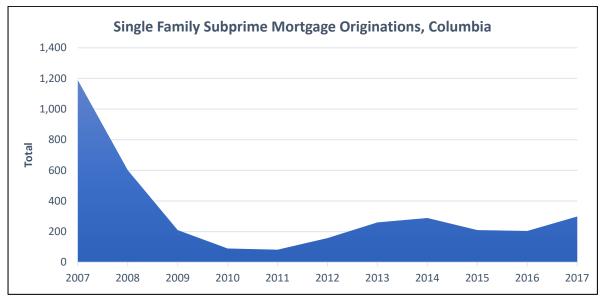
Within Columbia, Low and Very Low-Income neighborhoods represent 49 percent of the City's total neighborhoods, although they are represented by approximately 25 percent of total originations and 27 percent of total applications as of 2017, shown below. This suggests that Low and Very Low-Income neighborhoods within the City are less likely to participate in the single-family lending market relative to other neighborhoods. By contrast, loan applications and originations within Columbia are disproportionately likely to occur for properties in Middle and particularly High-Income neighborhoods.



Source: HMDA

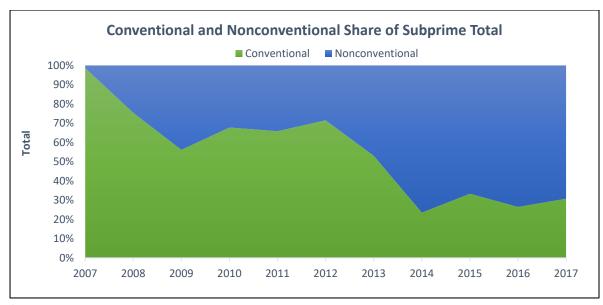
The Subprime Market

Illustrated below, the subprime mortgage market in Columbia declined significantly between 2007 and 2011, dropping by 93 percent. However, subprime originations more than doubled between 2011 and 2017, to about 300 per year (approximately 25 percent of the 2007 total). Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations decreased by approximately 75 percent on net between 2007 and 2017, while prime originations declined by 2 percent during the same time period. As a percent of Columbia's total, subprime originations declined from 21 percent to 6 percent between 2007 and 2017.



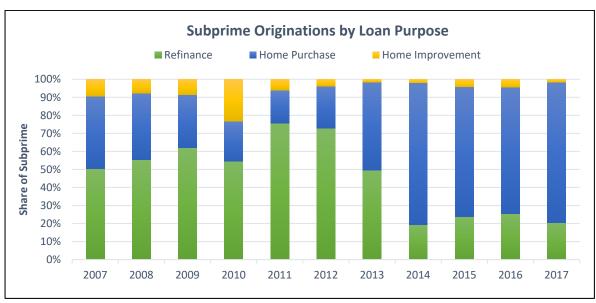
Source: HMDA

Consistent with broader national trends, the composition of subprime loans within Columbia has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, 99 percent of subprime loans within the City were originated by conventional lenders. As of 2017, that percentage is 31 percent, the lowest of all years examined. Of the nonconventional subprime loans originated in Columbia, 98 percent are insured by the Federal Housing Administration, while the remaining 2 percent are insured by the VA. By contrast, the FHA's share of nonconventional prime loans is 51 percent, while 49 percent are insured by the Department of Veterans Affairs.



Source: HMDA

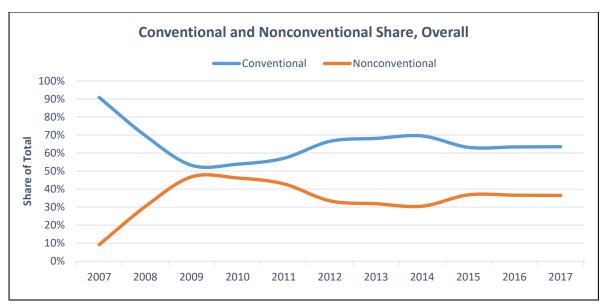
As a percentage of all subprime loan originations within Columbia, home purchases represented 78 percent in 2017, up from its share of 18 percent in 2011.



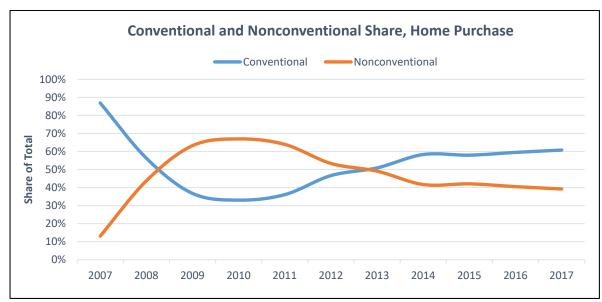
Source: HMDA

Though two-thirds of all subprime loans within Columbia in 2017 were nonconventional, 61 percent of all single-family originations in 2017 were from conventional lenders. The highest

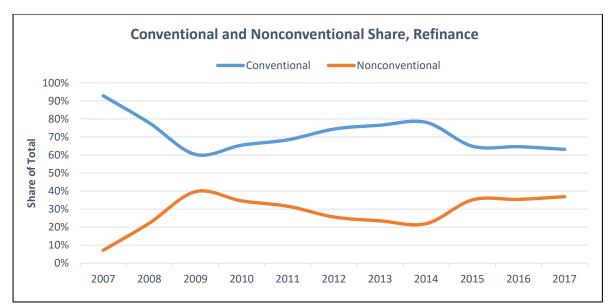
share of nonconventional originations for any loan purpose was for home purchase loans in 2010 at 55 percent. The share of conventional lending in Columbia has hovered around the low 60 percent range in the last few years.



Source: HMDA



Source: HMDA



Source: HMDA

Lending Practices Conclusion

Mortgage lending activity in Columbia is consistent with many of the broader trends that have occurred in the wake of the housing crash, Great Recession, and subsequent economic recovery.

Further, Columbia exhibits relatively strong mortgage market fundamentals. Home purchase originations have increased every year since 2011 and in 2017 were at the highest level of all years analyzed, suggesting signs of growing housing demand and a housing market recovery within the City. Additionally, the share of refinance applications denied for lack of collateral, suggesting an "under-water" home, has declined since the peak of the housing crisis.

The City has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations and a subprime lending market that remains far below its peak prior to the housing bust. Government-insured mortgages have increased, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Black and Hispanic applicants relative to White applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

Fair Housing Profile

Federal Laws

Numerous acts, laws, and presidential executive orders have been enacted in order to create fair housing opportunities throughout the US. The following information can be found on the website for the US Department of Housing and Urban Development (HUD). Some of the legislation in the section below does not directly address fair housing but is included because it promotes the prevention and termination of discrimination, which is related to fair housing law.

Presidential Executive Order 11063

John F. Kennedy, in 1963, created the first piece of fair housing legislation by issuing presidential executive order 11063. The terms of the order stated that "discrimination in the sale, leasing, rental, or other disposition of properties and facilities" is prohibited if the properties or facilities are owned, operated, or funded by the government.

Civil Rights Act of 1964

According to Title VI of the Civil Rights Act of 1964, "discrimination on the basis of race, color, or national origin" is prohibited in programs and activities receiving federal financial assistance.

Presidential Executive Order 11246

Lyndon B. Johnson, in 1965, issued executive order 11246. According to this amended presidential order, discrimination based on race, color, religion, sex, or national origin was forbidden in federal employment.

Fair Housing Act

The Fair Housing Act, which is Title VIII of the Civil Rights Act of 1968, prohibits discrimination or other unfair actions against persons, which "otherwise make unavailable or deny a dwelling to any person because of race, color, religion, sex, familial status, or national origin." The act prohibits both intentional housing discrimination — disparate treatment — and action or policies that may not seem to discriminate but do have a negative effect on fair housing choice — disparate impact. The federal Fair Housing Act provides for a broad range of sanctions and remedies to cure existing and prevent future violations.

Architectural Barriers Act

In 1968 the Architectural Barriers Act was enacted to increase accessibility for handicapped individuals. The act "requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds [...] must be accessible to and useable by handicapped persons."

Education Amendments Act 103

Title IX of the Education Amendment Act of 1972 prohibits discrimination based on sex. This applies to federally funded education programs or activities.

Rehabilitation Act

The Rehabilitation Act of 1973 is a provision of the federal Fair Housing Act administered by HUD. Section 504 of the act prohibits a "refusal to make accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford them [the handicapped person] equal opportunity to use and enjoy a dwelling [...] including public and common use areas." This act includes nearly all public activities that can adversely affect housing for handicapped people and is not limited to federally funded projects.

Housing and Community Development Act

Section 109 of Title I of the Housing and Community Development Act of 1974 protects against discrimination when HUD funds are involved. That is, programs and activities receiving financial assistance from HUD's Community Development Block Grant Program cannot discriminate based on race, color, national origin, sex, or religion.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), passed by Congress in 1975, was created in order to make loan information publicly available. HMDA mandates that information to help determine how financial institutions are responding to the housing needs be made available to local communities. HMDA also assists public officials in attracting private investors. Additionally, the Act aids in identifying discriminatory lending practices. HMDA requires the disclosure of information from banks, savings associations, credit unions, and other mortgage lending institutions. The required information includes the distribution of home mortgage and home improvement lending on a geographic and demographic basis such as the distribution of mortgage loans to minorities. More specifically, reporting requirements include data on the number, type, and amount of loans as well as the type of action taken — applications approved but not accepted, applications denied, applications withdrawn, or files closed as incomplete (http://www.ffiec.gov/hmda/history.htm)

Age Discrimination Act

The Age Discrimination Act of 1975 prohibits discrimination based on age. This applies to federally funded programs or activities.

Community Reinvestment Act

According to the U.S. Environmental Protection Agency, lenders, developers and property owners are concerned about the cost and liabilities of cleaning up and refinancing low-to-moderate income urban neighborhoods, leading them to develop in other areas that are perceived to be less risky. The Community Reinvestment Act (CRA) was enacted by Congress in 1977, to "require banks, thrifts, and other lenders to make capital available in low- and moderate-income urban neighborhoods, thereby boosting the nation's efforts to stabilize these declining areas" (http://www2.epa.gov/brownfields).

The CRA applies to federally insured depository institutions, national banks, thrifts, and state-

chartered commercial and savings banks (http://www.occ.gov/topics/compliance-bsa/cra/index-cra.html). It works to prevent redlining – discrimination by refusing to grant loans, mortgages or insurance to people in a specific area, particularly those deemed poor or to be "financial risks."

In May 1995, the Office of the Comptroller of the Currency revised the CRA to allow lenders to claim community development loan credits for loans "made to help finance the environmental cleanup or redevelopment of an industrial site when it is part of an effort to revitalize the low-and moderate-income community in which the site is located." This revision was intended to encourage economic activity in inner-city neighborhoods through financing and property redevelopment.

The CRA requires that each insured bank's record of helping meet the credit needs of its entire community be evaluated periodically (http://www.ffiec.gov/cra/history.htm). There are several organizations that work to promote and ensure the credibility and compliance of all lenders subject to the CRA: Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRS), and the Federal Deposit Insurance Corporation (FDIC). The Office of Thrift Supervision (OTS) as of 2011 is no longer an active regulatory agency. The following active institutions are required to report data under the CRA:

- All savings associations except small institutions (those with total assets equaling less than \$1 billion in the past 2 years) regulated by the OTS.
- All state member banks, state nonmember banks, and national banks except small institutions (those with total assets less than \$250 million in the past 2 years) regulated by the FRS, FDIC, and OCC.

Amendment of the Federal Fair Housing Act

In 1988 the federal Fair Housing Act was amended to include handicapped persons among those protected; those with one or more handicaps are discriminated against when there is a failure to make reasonable modifications to residential premises which may be necessary to enable a handicapped person "full enjoyment of the premises."

Americans with Disabilities Act

Title II of the Americans with Disabilities Act of 1990 prevents discrimination against disabled persons. More specifically, public programs, services, and activities cannot discriminate based on disabilities. Further, "HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals."

Presidential Executive Order 12892

In 1994 President William J. Clinton issued his first presidential executive order pertaining to fair housing. The amended executive order 12892 "requires federal agencies to affirmatively further fair housing in their programs and activities."

Presidential Executive Order 12898

In 1994, President Clinton issued his next presidential executive order pertaining to fair housing. According to executive order 12898, federal agencies must conduct programs, policies, and activities that have an impact on the environment and individuals' health in a way that does not exclude anyone based on race, color, or national origin.

The Quality Housing and Work Responsibility Act

The Quality Housing and Work Responsibility Act (QHWRA), signed by President Clinton in 1998, applies to public housing and public housing voucher programs. Its purposes range from "reducing the concentration of poverty in public housing," to creating opportunities and incentives for public housing residents to find work, to rehabilitating public housing units through the establishment of the HOPE VI program.

Presidential Executive Order 13166 107

In 2000, President Clinton issued his final presidential executive order pertaining to fair housing. Executive order 13166 strives to eliminate the barrier caused by poor English proficiency that would deny benefits from federally funded programs and activities.

Presidential Executive Order 13217

In 2001, President George W. Bush issued the most current fair housing-related executive order. His executive order 13217 requires federal agencies to examine their policies and programs in order to find way to improve the availability of "community-based living arrangements for persons with disabilities."

June 2015 Supreme Court Ruling on Fair Housing

On June 25, 2015 the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring "disparate impact" claims under Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying, or securing financing for housing. The case, Texas Department of Housing and Community Affairs v. Inclusive Communities Project, centered on the question of whether a policy or action has to be intentionally discriminatory, or merely have a discriminatory effect, in order to qualify as a valid basis for a discrimination claim under the Act.

Inclusive Communities, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. Inclusive Communities claimed that regardless of intention, the state's decision to fund tax-credit projects only in minority and poverty-laden neighborhoods resulted in segregation, and thus had a

discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled against disparate impact claims that it would essentially "defang" the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

Recent HUD Fair Housing Guidance

Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities based on race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD's Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a "substantial, legitimate, nondiscriminatory interest" served by the policy.

HUD's guidance is intended to eliminate barriers to securing housing for that population, and it is imperative that all jurisdictions make a clear effort to eliminate any discriminatory barriers these individuals may face. For former inmates to avoid recidivism and work in society they must have access to housing free of discrimination.

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

On September 21, 2016 HUD published a final rule entitled "Equal Access in Accordance with an Individual's Gender Identity in CPD programs." Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity all HUD funded programs. This rule builds upon the 2012 final rule, "Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity" (2012 Equal Access Rule). This final rule ensures that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

Furthermore, as HIV/AIDS disproportionally affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is Illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the

two emails was the sexual orientation of the prospective renting couples. The study finds:

"[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions with state-level protections against housing discrimination based on sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions without such protections. "

Fair Housing Complaints

To register a complaint with the SCHAC, the aggrieved party must officially file the complaint within 180 days after the date of the alleged discrimination. Within 10 days of the initial filing, the Compliance staff of the Commission investigates the complaint and notifies the applicant of the validity of the complaint. If a violation has occurred, a formal complaint form is completed. During this process, every effort is made to mediate and resolve the problem. The primary mechanism used for mediation and resolution of complaints is the Mediation/Alternative Dispute Resolution effort. This effort is a voluntary process designed to facilitate case closure by bringing the parties in dispute together and reaching a mutually acceptable solution. An impartial party facilitates negotiations — precluding the investigation process and usually resulting in both respondent and complainant emerging with a "win-win" solution to the problem.

Investigations must be completed within 100 days after the filing of a complaint, except in cases where overwhelming issues prevent completion of the investigation within that time period. If the SCHAC determines that there are no reasonable grounds for the complaint, the complaint is dismissed. If the determination is that there are reasonable grounds for the complaint and settlement efforts are unsuccessful, one of the following options may be pursued:

- 1. Either party may elect to have the claim decided in a civil action. If this option is chosen, the SCHAC must initiate and maintain a civil action on behalf of the aggrieved person within 30 days from the date of election.
- 2. If neither party chooses to elect a civil action, SCHAC refers the charge to the Chairman of the Commission to designate a panel of three members to hear the complaint.
- 3. The complainant may choose to sue the respondent in State court. If this option is chosen it is done at the expense of the participants, with no involvement by SCHAC.

In South Carolina, the Office of Fair Housing and Equal Opportunity (FHEO) of the US Department of Housing and Urban Development also directly receives and investigates Fair Housing complaints from persons who believe that they have been discriminated against based on race, color, national origin, sex, family status or disability when trying to buy or rent a home or apartment. Because aggrieved parties may officially file a complaint with the FHEO within 365

days after the date of the alleged discrimination, cases filed with the SCHAC that have not been resolved within 180 days of filing are referred to the Office of Fair Housing and Equal Opportunity for resolution. As with complaints filed with the SCHAC, investigations must be completed within 100 days after the filing of a complaint, barring overwhelming issues that require a longer investigation. Complaints can be made by contacting the South Carolina FHEO field office directly, filing the complaint online through the HUD web site (www.hud.gov), or by calling the dedicated toll-free number at 800-669-9777.

According to the SC Human Affairs Commission, a total of 129 complaints were filed in the city during the past six years. The following table lists the complaints by closure date from 2014 to 2019.

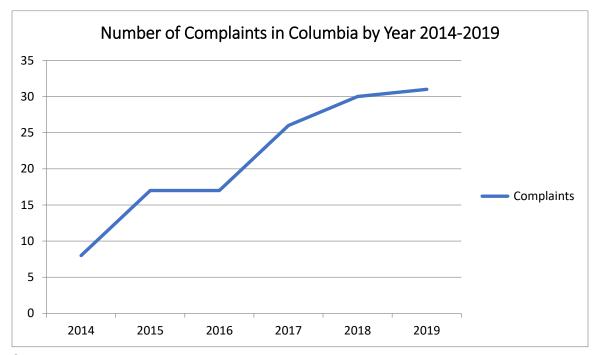
	Filed Cases for City of Columbia, SC								
	January 1, 2014- December 31, 2019								
Violation City	State	Filing Date	Closure Reason	Basis					
Columbia	SC	01/10/14	No cause determination	Race					
Columbia	SC	02/11/14	Complaint withdrawn by complainant after resolution	Disability, Retaliation					
Columbia	SC	04/02/14	No cause determination	Disability, Retaliation					
Columbia	SC	05/22/14	Complaint withdrawn by complainant after resolution	National Origin					
Columbia	SC	05/27/14	No cause determination	Race, Color, Retaliation					
Columbia	SC	06/10/14	No cause determination	National Origin					
Columbia	SC	07/18/14	No cause determination	National Origin					
Columbia	SC	08/27/14	No cause determination	Sex, Disability					
Columbia	SC	01/21/15	Conciliation/settlement successful	Race, Disability, Retaliation					
Columbia	SC	02/18/15	Conciliation/settlement successful	Sex, Retaliation					
Columbia	SC	02/25/15	No cause determination	Disability					
Columbia	SC	04/13/15	No cause determination	National Origin					
Columbia	SC	04/16/15	Complaint withdrawn by complainant after resolution	Disability					
Columbia	SC	05/08/15	No cause determination	Disability					
Columbia	SC	05/20/15	Conciliation/settlement successful	Disability, Familial Status					
Columbia	SC	07/13/15	Complaint withdrawn by complainant after resolution	Race, Disability					
Columbia	SC	07/27/15	No cause determination	Race, Color					
Columbia	SC	09/08/15	Complaint withdrawn by complainant after resolution	Race, Disability, Retaliation					
Columbia	SC	09/11/15	Conciliation/settlement successful	Race, Retaliation					
Columbia	SC	09/18/15	No cause determination	Race, Sex					
Columbia	SC	09/22/15	No cause determination	Retaliation					
Columbia	SC	10/14/15	Complaint withdrawn by complainant without resolution	Disability, Familial Status					
Columbia	SC	11/10/15	Conciliation/settlement successful	National Origin					
Columbia	SC	11/23/15	No cause determination	Disability					
Columbia	SC	12/14/15	No cause determination	Race, Color					
Columbia	SC	01/21/16	No cause determination	Retaliation					
Columbia	SC	01/25/16	Dismissed for lack of jurisdiction	Disability					
Columbia	SC	01/29/16	Conciliation/settlement successful	Disability, Retaliation					
Columbia	SC	02/04/16	Conciliation/settlement successful	Race, Color					
Columbia	SC	02/08/16	No cause determination	Disability					
Columbia	SC	03/23/16	No cause determination	Race, Sex, Disability, Retaliation					
Columbia	SC	04/14/16	No cause determination	Disability					
Columbia	SC	04/21/16	Conciliation/settlement successful	Disability					
Columbia	SC	05/09/16	Conciliation/settlement successful	Disability					
Columbia	SC	05/10/16	No cause determination	Disability					

Columbia	SC	05/11/16	No cause determination	Disability
Columbia	SC	05/26/16	No cause determination	Disability, Retaliation
Columbia	SC	06/29/16	Conciliation/settlement successful	Race
Columbia	SC	09/21/16	Complainant failed to cooperate	Race
Columbia	SC	10/17/16	Conciliation/settlement successful	Race
Columbia	SC	10/17/16	Conciliation/settlement successful	Sex
Columbia	SC	11/29/16	Conciliation/settlement successful	Disability
Columbia	SC	02/01/17	No cause determination	Disability
Columbia	SC	03/17/17	Conciliation/settlement successful	National Origin, Familial Status
Columbia	SC	04/12/17	No cause determination	Sex, Disability
Columbia	SC	05/05/17	Complaint withdrawn by complainant without resolution	Disability
Columbia	SC	05/25/17	No cause determination	Disability
Columbia	SC	06/01/17	No cause determination	Race
Columbia	SC	06/16/17	No cause determination	Disability
Columbia	SC	06/22/17	Dismissed for lack of jurisdiction	National Origin, Retaliation
Columbia	SC	07/07/17	No cause determination	Sex, Retaliation
Columbia	SC	07/07/17	No cause determination	Disability
Columbia	SC	07/07/17	No cause determination	Disability
Columbia	SC	07/11/17	Conciliation/settlement successful	Disability
Columbia	SC	08/01/17	No cause determination	·
Columbia	SC	· · ·		Race, Disability, Retaliation
	SC	08/28/17	Complaint withdrawn by complainant without resolution No cause determination	Disability
Columbia	_	08/28/17		Race
Columbia	SC	08/31/17	No cause determination	Disability
Columbia	SC	09/15/17	No cause determination	Disability
Columbia	SC	09/15/17	No cause determination	Disability
Columbia	SC	09/19/17	No cause determination	Disability
Columbia	SC	10/05/17	Conciliation/settlement successful	Disability, Retaliation
Columbia	SC	10/05/17	Conciliation/settlement successful	Race, Disability, Retaliation
Columbia	SC	10/12/17	No cause determination	Disability, Retaliation
Columbia	SC	10/16/17	Conciliation/settlement successful	Disability
Columbia	SC	10/24/17	No cause determination	Disability
Columbia	SC	10/24/17	No cause determination	Disability
Columbia	SC	11/21/17	No cause determination	Disability
Columbia	SC	01/29/18	No cause determination	Sex, Disability, Retaliation
Columbia	SC	02/13/18	Conciliation/settlement successful	Race, Retaliation
Columbia	SC	02/22/18	No cause determination	Race, Sex, Retaliation
Columbia	SC	02/26/18	No cause determination	Race, Color, Retaliation
Columbia	SC	02/26/18	No cause determination	Retaliation
Columbia	SC		No cause determination	Disability
Columbia	SC	04/11/18	No cause determination	Race, Disability, Familial Status
Columbia	SC	05/03/18	No cause determination	Race, Disability, Retaliation
Columbia	SC	05/03/18	Conciliation/settlement successful	Disability
Columbia	SC	05/09/18	Complainant failed to cooperate	Disability
Columbia	SC	05/17/18	No cause determination	Race, Retaliation
Columbia	SC	05/18/18	No cause determination	Disability, Retaliation
Columbia	SC	05/23/18	No cause determination	Disability, Retaliation
Columbia	SC	05/23/18	Conciliation/settlement successful	Familial Status
Columbia	SC	05/23/18	No cause determination	Race
Columbia	SC	05/31/18	No cause determination	Race, Sex
Columbia	SC	06/07/18	No cause determination	Race, Familial Status, Retaliation
Columbia	SC	06/07/18	No cause determination	Race, Religion
Columbia	SC	07/18/18	No cause determination	National Origin
Columbia	SC	07/18/18	No cause determination	National Origin
Columbia	SC	07/20/18	No cause determination	Disability

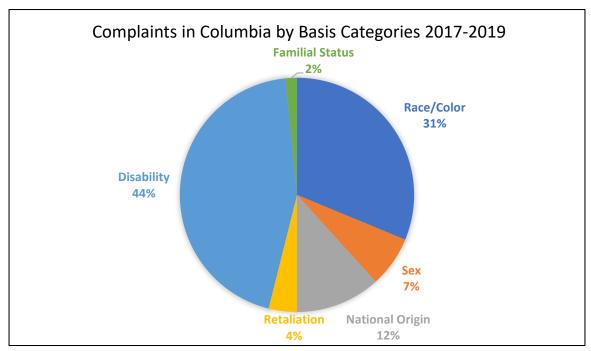
Columbia	SC	08/03/18	No cause determination	National Origin	
Columbia	SC	08/03/18	No cause determination	National Origin	
Columbia	SC	08/17/18	No cause determination	Disability	
Columbia	SC	08/20/18	No cause determination	National Origin	
Columbia	SC	08/24/18	No cause determination	Disability	
Columbia	SC	09/05/18	No cause determination	National Origin	
Columbia	SC	09/24/18	Complainant failed to cooperate	Disability	
Columbia	SC	11/06/18	No cause determination	Disability, Retaliation	
Columbia	SC	11/15/18	Complainant failed to cooperate	Disability	
Columbia	SC	01/28/19	No cause determination	Familial Status	
Columbia	SC	02/06/19	Complaint withdrawn by complainant after resolution	Disability, Retaliation	
Columbia	SC	02/12/19	Conciliation/settlement successful	Disability	
Columbia	SC	02/22/19	No cause determination	Sex, Disability	
Columbia	SC	02/22/19	No cause determination	Race, Disability	
Columbia	SC	03/11/19	No cause determination	Race, Retaliation	
Columbia	SC	03/25/19	No cause determination	Disability	
Columbia	SC	03/25/19	Dismissed for lack of jurisdiction	Disability	
Columbia	SC	03/26/19	No cause determination	Race	
Columbia	SC	04/10/19	No cause determination	Race	
Columbia	SC	05/02/19	No cause determination	Race, Sex, Disability, Retaliation	
Columbia	SC	05/16/19	No cause determination	Sex, Familial Status	
Columbia	SC	05/21/19	No cause determination	National Origin	
Columbia	SC	06/20/19	No cause determination	Disability	
Columbia	SC	08/06/19	No cause determination	Retaliation	
Columbia	SC	08/12/19	No cause determination	Race, Retaliation	
Columbia	SC	08/12/19	Conciliation/settlement successful	Race, Sex, Disability, Retaliation	
Columbia	SC	09/17/19	Conciliation/settlement successful	Race, Disability	
Columbia	SC	09/17/19	No cause determination	Race	
Columbia	SC	09/27/19	No cause determination	Race, Disability, Retaliation	
Columbia	SC	09/27/19	No cause determination	Race, Disability	
Columbia	SC	10/08/19	No cause determination	Disability	
Columbia	SC	10/22/19	No cause determination	Race, Sex, Disability	
Columbia	SC	10/22/19	No cause determination	Disability, Retaliation	
Columbia	SC	11/04/19	No cause determination	Race, National Origin, Disability	
Columbia	SC	11/27/19	No cause determination	Disability, Retaliation	
Columbia	SC	12/06/19	No cause determination	Retaliation	
Columbia	SC	12/10/19	No cause determination	Disability, Retaliation	
Columbia	SC	12/10/19	No cause determination	Disability, Retaliation	
Columbia	SC	12/17/19	No cause determination	Race, Familial Status, Retaliation	
Columbia		12/26/19			

Source: HUD

During the six-year period between 2014 and 2019, 129 complaints were filed in Columbia with the highest amount in 2018 and 2019 with 30 and 31 complaints, respectively. Disability is the leading basis for fair housing complaints making up 44% of the complaints. Landlords are often uneducated on fair housing rights for disabled citizen and making "reasonable modifications". The second leading cause us race/color with 31% of the complaints citing this as the basis.



Source: HUD



Source: HUD

Citizen Participation Process

In outlining their vision for the development of this document, the City of Columbia staff sought the widest possible input from residents, stakeholders, housing professionals, 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 several public meetings throughout the City during February and April 2020. These meeting notices were posted in City buildings and appeared in print and online media.

Fair Housing Survey

The City of Columbia administered a citywide survey on residents' experiences with the local

housing market from December 10, 2019 through March 24, 2020. It was available online and heavily circulated on City website, social media, neighborhood groups, and public meetings. The community survey received 50 total responses. There were eight questions in the survey related to housing discrimination:

- 1. Do you believe housing discrimination is an issue in your neighborhood?
- 2. 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)
- 3. Who do you believe discriminated against you?
- 4. On what basis do you believe you were discriminated against?
- 5. If you believe you have been discriminated against, have you reported the incident?
- 6. If you believe you have been discriminated against and did not reported the incident, why?
- 7. Have you ever witnessed or are aware of others being discriminated against in housing in your community?
- 8. If Yes, who discriminated in housing?

Survey Takeaways

Twenty-four percent of the respondents believed housing discrimination is an issue in their neighborhood. Only 10% of the respondents reported having personally being discriminated against for housing. Race/color were the leading reasons cited. With this small of a sample size, it's difficult to make any conclusions, but 80% did not report the incident due to not knowing how or not believing it makes a difference.

Previously Identified Impediments to Fair Housing Choice

As with the prior 2015 Analysis of Impediments to Fair Housing, this report is made available by data collected from public and private sector information from the City of Columbia, the real estate, finance and lending, banking industry, the Columbia Housing Authority and the local HUD Office of Fair Housing and Equal Opportunity and the city's Community Development Department. Based on the findings from these reports, the following were previously identified impediments:

- Impediment 1: Lack of Fair Housing Awareness
- Impediment 2: Lack of Transportation Option
- Impediment 3: Affordability
- Impediment 4: Poor Credit History is Preventing Home Ownership Opportunities
- Impediment 5: Handicap Accessible Housing Units Special Needs Housing
- Impediment 6: Concentrations of Racial/Ethnic Segregation and Housing Problems

Actions to Overcome Previously Identified Actions

Impediment 1: Lack of Fair Housing Awareness

The City of Columbia continues to increase its homebuyer outreach and education, and credit counseling. The City expanded promotional and hosting efforts and provided information related to fair housing laws and contact information for fair housing complaints on the city website. The City has hosted numerous "Speak Out" events over the last several years in an effort to educate the general public and landlords/property owners about fair housing rights and to increase homeownership knowledge and paths to affordable housing. The City works with and helps fund several partners that advocate for renter's rights and promote fair housing through education and counseling.

<u>Impediment 2: Lack of Transportation Option</u>

The City has pushed for improved public transportation over the last several years in order to improve access to housing choice and improve options for business commuting. Behind efforts of the mayor and other city and neighborhood leaders, the region's bus system, the Comet, transformed into a more efficient and modern operation, with a new fleet of vehicles equipped with Wi-Fi, new routes and soaring ridership — up 70% from 2012 to 2017. In 2018, the system partnered with Uber and Lyft to give riders a \$5 credit toward trips to and from the supermarket, easing the struggles of carrying groceries on a bus for many elderly citizens. A pilot program called Ride@50+, a ride-hailing program, was launched and has proved beneficial in the city's lower-income neighborhoods. Users can visit the website, an app, or even call a real person on a phone

line and indicate their pickup spot and destination. Despite efforts to improve transportation options, personal vehicle use still leads as the most used option in the City.

Impediment 3: Affordability

The City of Columbia has been helping individuals and families for decades get into homeownership, make home improvements, rehabilitate or build new homes throughout the city by utilizing funds from U.S. Department of Housing and Urban Development through their Community Development Block Grant Program (CDBG), HOME investment Partnership Program (HOME) and the City's General Funds. Over the last five years, the city's number one priority set in its Consolidated Plan is to improve housing affordability by providing homebuyer opportunities, increasing and improving the supply of affordable rental housing, assisting homeowners with needed repairs. Actions include funding through CDBG and HOME funding to the need to improve housing affordability. HOME funds were used to further the City's commitment to make homeownership more affordable for very low, low- and moderate-income persons. Down payment assistance and affordable housing loans are made available to remove the obstacles to homeownership. HOME funds were also committed to an Affordable Housing Project (Homes for HOPE) in partnership with Richland County CDBG funds for the Edisto Court Redevelopment Area. The City of Columbia continues to partner with Columbia Housing Authority to provide safe, affordable housing. The City supports Columbia Housing Authority's plan for homeownership education and counseling and the use of Section 8 vouchers for homeownership.

Impediment 4: Poor Credit History is Preventing Home Ownership Opportunities

As stated above, the City continues to work with a number of partners to expand, fund, and promote credit counseling programs and financial literacy training programs in order to improve access to LMI households. The City has hosted educational seminars and offered credit counseling events sessions that have helped hundreds of citizens improve their opportunities for homeownership.

Impediment 5: Handicap Accessible Housing Units - Special Needs Housing

The City of Columbia continues to regulate ADA compliance with all new construction and encourages subrecipients and partners to build/rehab accessible housing units. As part of the its fair housing rights advocacy and education promotions, the City has held seminars and fair housing events specifically focusing on disability discrimination. The city aims to educate the public on their rights, but also to build the knowledge base of landlords and property owners when it comes to "reasonable accommodations" for disabled tenants.

Impediment 6: Concentrations of Racial/Ethnic Segregation and Housing Problems

The City has also pushed for overcoming racial and ethnic segregation and housing problems through fair housing seminars and advocacy efforts. The City encourages partners and subrecipients to add/maintain affordable housing throughout the entire City of Columbia. The City of Columbia will continue to monitor the administrative processes and procedures that might inhibit fair housing. The City will review city ordinances and regulations that might pose additional burdens. The City will continue to meet with representatives from other local governmental jurisdictions, Columbia Housing Authority, and United Way of Midlands to discuss housing development issues. Community Development staff will continue to participate with Greater Columbia Community Relations Council to identify and address fair housing issues.

Identification of Impediments to Fair Housing Choice

Fair Housing Related Impediments

Impediment 1: The Zoning Ordinance and Land Use Regulations Constrain Housing Diversity.

There are numerous regulations and zoning restrictions within the Columbia Zoning Ordinance that impede the facilitation and location of new residential development, especially in-fill development of affordable housing. Achieving housing diversity objectives are obstructed, in part, by numerous locational conditions and controlling regulations that discourage new residential investment. This condition is especially relevant to stimulating the development of more affordable housing.

Impediment 2: The Aging Housing Stock Requires Increased Investment and Maintenance.

The housing stock in Columbia is relatively old compared to Richland County and other larger cities in South Carolina. A majority of housing units were built prior to 1980 including 38.7% that were constructed at least 50 years ago and 36% built prior to 1960.

Units built prior to 1980 are at risk of having led-based paint in them and require special care during rehabilitation. There are several areas in the city where 90% or more of the homes have a risk of lead-based paint. Most the city's census tracts have over 70% of the housing stock that was built prior to 1980. In Columbia, there are nearly 31,500 units making up 58.9% of the stock that are at risk of lead-based paint.

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 decline to the point of needing demolition.

Affordable Housing Related Impediments

Impediment 3: There is a Shortage of All Types of Residential Product.

Since 2010, there has been a small increase in the number of new residential units. Residential units of all types have been lost since 2010, resulting in a net gain of only 265 housing units despite nearly 1,900 new units coming on the housing market.

This decline in new construction is especially significant among single family units which averaged over 400 new units annually during the first decade of this century. Furthermore, the number of occupied housing units in the City fell from 87.7% in 2010 to 86.4% in 2017 despite an increase in population of 2,964 during this same seven-year period. The price per unit in Columbia indicates that the production of large multi-family properties produces significantly more affordable units. Yet, large multifamily properties make up approximately 43% of the new

building permits since 2010.

<u>Impediment 4: A Majority of Renters are Cost Burdened.</u>

A majority of the city's renters are housing cost burdened. Nearly 55% of renters are cost burdened and 45% of renters pay 35% or more of their income to housing costs. Median contract rents in the City of Columbia have grown at approximately twice the rate as the median home value since 2010. Consequently, renters are more cost burdened which can lead to housing instability and inability to transition into home ownership and achieve greater residential stability. A household that can purchase property within their means is able to provide a more secure housing situation and potential intergenerational wealth.

There is a mismatch in rental units, particularly for lower income renters earning less than \$20,000, which encompasses 36% of all renters. The Comprehensive Plan identified a gap of more than 3,200 units for extremely low-income households, not including students. There is also a mismatch in rental units for those earning between \$50,000 and \$100,000.

It is reasonable to note that a small segment of these cost burdened renters are college students who economic condition will likely increase upon leaving student status. Nevertheless, there is limited city policy direction for off-campus student housing among Columbia's existing neighborhood plans.

Even without considering housing cost burden, renters have greater housing instability and a greater likelihood of needing assistance. With rents, and home prices increasing faster than household incomes, it is likely that more households will reduce housing choices in the future according to the city's BBC Consulting study of the Columbia housing market. There are many lower income property owners of historic properties who cannot afford initial payments to comply with property tax abatement benefits that can be granted for historic preservation.

Impediment 5: There has been a Decline in The Amount of Non-Student Housing.

The conversion of neighborhood housing to student rental properties has decreased the inventory of available non-student owner-occupied and rental housing in many areas of the city. The University of South Carolina reported that 65.7% of all full-time college students lived off-campus in 2018¹. Furthermore, according to the Census Bureau's data, Columbia has about 106,300 in-commuters (people living outside the City of Columbia but working in Columbia),

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¹ Office of Institutional Research, Assessment, and Analytics. University of South Carolina (2018) http://ipr.sc.edu/enrollment

Fair Housing Action Plan

Action A - Establish incentives to encourage developers to construct affordable housing units.

Incentives start with continued efforts that remove barriers to creating affordable housing. One important action is to give a greater ability to the Planning Commission and the Board of Zoning Appeals to increase density under specified circumstances that support housing diversity.

The City should apply the green building incentives approach for developers to construct affordable housing units. Affordability housing incentives can be modeled after the green building incentives approach to offer density bonuses; increase in height; increase in lot coverage; and reduction from minimum parking requirements. The incentives should also consider regulatory waivers, as well as an expansion of the tax abatement program.

It is further recommended that the City waive or significantly discount plan review, building permit, rezoning and subdivisions fees for affordable housing projects. These discounts and/or waiver should also be applied to sanitary sewer tap fees and water tap fees².

Action B - Leverage public land and funding to develop affordable housing.

The City should offer discounted public lands to affordable housing developers including acquisition of additional public land for the provision of affordable housing. In addition, the City should also routinely and actively support the University of South Carolina's commitment to the South Carolina Commission of Higher Education to construct more on-campus student housing facilities.

Action C - Incentivize development of multi-unit housing.

By expanding and incentivizing the development of 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 Columbia workers live outside the City.

Action D - Create a Columbia Housing Trust Fund.

Although the Midlands Housing Trust Fund is currently supported financially by the City of Columbia, other public and new private revenues may be generated and applied within the City of Columbia that will further efforts to create more affordable housing. A Columbia Trust Fund can prioritize city funds and leverage federal, state and private resources to those households and/or neighborhoods most in need of affordable housing and the development of more housing

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² City of Columbia Residential Development Review Fees 2019

options. The City's Housing Trust Funds should prioritize:

- Supporting multi-family new construction and rehabilitation;
- Facilitating homeownership development in targeted neighborhoods;
- Assisting housing for seniors, disabled and homeless populations; and
- Acquiring selected properties for resale for development of affordable housing.

Action E - Revise the Zoning Ordinance and Land Development Regulations.

Although revisions to the city's Zoning Ordinance are underway, it is recommended that these revisions include the following:

- Policies that encourage the development of more off-campus student housing combined with appropriate regulations to regulate parking, noise, and other issues arising from student rental housing.
- Promoting awareness and the use of accessory dwelling units to expand the range of housing options in conjunction with single-family residential units.
- Offering certain regulatory waivers for a variety of unit types, especially affordable housing units, within a development.
- Streamlining existing regulations for developers and property owners to make it easier for compliance with the regulations.
- Accommodating and supporting the development of transitional and emergency housing to clarify the standards for housing in serving populations needing such housing.

The City should also evaluate establishing citywide overlay zoning to reduce the incidence of residential teardowns and educate property owners and other members of the community about why these policies and protections are in place.

Action F – Increase the Housing Inventory by Promoting Infill and Additional New Residential Redevelopment.

It is recommended that the city use their locational criteria to be more geographical flexible and expands where new affordable housing can be located. It is important to ensure that these geographic designations are updated annually to keep up with market conditions and residential development trends. This includes planning for the use of existing underutilized properties along commercial corridors for infill and redevelopment that facilitates residential uses.

The protection of historical characteristics can be supported by incentives for property owners to maintain and improve their older homes compatible with the surrounding character. This action includes promoting the use of the South Carolina Abandoned Buildings Act tax credits to

incentivize the rehabilitation, renovation or redevelopment of abandoned buildings and sites. This action should also promote the use of the Bailey Bill property tax exemptions to encourage the rehabilitation of historic properties.

<u>Action G – Increase the Promotion of Fair Housing.</u>

Increase public educational efforts are needed to understand the importance of affordable housing in the community. The City and local nonprofits need to continue to educate area realtors, bankers, and landlords to ensure awareness of discriminatory housing policies and promote fair housing opportunities for all residents and continue to educate and make residents. At the same time, residents must be made aware of their rights under the Fair Housing Act and the Americans with Disabilities Act (ADA).

Action H - Expand and Leverage Financial Support to Housing Assistance Programs.

Increases in state and federal resources will not completely address the city's housing needs³. Therefore, despite the city's existing financial and resource commitments, it is recommended that additional funding be annually allocated to the Emergency Loan (HELP) program to provide deferred loan payments to qualified households for homeowner repair and emergency rehabilitation. The City should also increase funding and leverage other funding and promote the City Lender and the Maintenance Assistance Programs.

Action I - Strengthen the Rental Housing Regulations Ordinance.

The City should increase the use of property maintenance and code enforcement inspections so rental units are safe and well maintained through a more aggressive system of inspections. These code revisions should also require a yearly inspection of the property with the city⁴. (Recognition and awards/publicity could also be given to projects with the "highest level" buildings or landlords.

³ South Carolina Housing Needs Assessment 2019

 $^{^4}$ City of Clemson Rental Housing Regulations - http://online.encodeplus.com/regs/clemson-sc/docviewer.aspx#secid-901

Action Plan Conclusion

The city continues to make strides in promoting fair housing choice and ensuring that all citizens have equal access to decent housing options. In summary, implementation of these recommended actions will support the key housing goals within the City's Columbia Compass: Envision 2036:

- 1. Provide homebuyer opportunities
- 2. Increase and improve the supply of affordable rental housing
- 3. Assist homeowners with needed repairs
- 4. Provide for special needs housing opportunities
- 5. Promote Fair Housing
- 6. Improve access to housing opportunities
- 7. Reduce hazards in homes, including lead-based paint, mold and asbestos
- 8. Increase capacity of housing and services providers

Appendices

Appendix A - Data Tables

Table: Population Change

	2000	2010	2017	% Change 2000-2010	% Change 2010-2017	% Change 2000-2017			
Columbia	116,278	127,605	132,236	9.7%	3.6%	13.7%			
South Carolina	4,012,012	4,511,428	4,893,444	12.4%	8.5%	22.0%			
Source: 2000 Census, 2006-2010 & 2013-2017 American Community Survey 5-Year Estimates (DP05)									

Table: Age

J	Colu	mbia	South C	Carolina
	# of People in Age	% of People in Age	# of People in	% of People in
	Group	Group	Age Group	Age Group
Under 5 years	6,696	5.1%	289,964	5.9%
5 to 9 years	5,606	4.2%	309,396	6.3%
10 to 14 years	5,309	4.0%	306,139	6.3%
15 to 19 years	19,579	14.8%	322,182	6.6%
20 to 24 years	19,915	15.1%	340,162	7.0%
25 to 34 years	22,752	17.2%	638,521	13.0%
35 to 44 years	13,821	10.5%	598,756	12.2%
45 to 54 years	13,280	10.0%	649,562	13.3%
55 to 59 years	6,509	4.9%	328,870	6.7%
60 to 64 years	5,933	4.5%	314,636	6.4%
65 to 74 years	7,617	5.8%	489,068	10.0%
75 to 84 years	3,695	2.8%	223,628	4.6%
85 years and over	1,524	1.2%	82,560	1.7%
Median Age	28.3		39.0	
Source: 2013-2017 Ar	merican Community Sur	vey 5-Year Estimates (D	P05)	

Table: Race and Ethnicity

	Colur	mbia	South Carolina		
	Estimate	%	Estimate	%	
White	63,662	48.1%	3,119,676	63.8%	
Black or African American	53,636	40.6%	1,321,219	27.0%	
American Indian or Alaska Native	162	0.1%	13,464	0.3%	
Asian	3,469	2.6%	71,123	1.5%	
Native Hawaiian and Other Pacific Islander	259	0.2%	2,776	0.1%	
Some Other Race	423	0.3%	7,566	0.2%	
Two or More Races	2,999	2.3%	90,222	1.8%	
Hispanic	7,626	5.8%	267,398	5.5%	
Source: 2013-2017 American Communit	ty Survey 5-Ye	ar Estimates (I	DP05)		

Table: Poverty and Race or Ethnicity

	Colu	mbia	South C	Carolina
	Number	Percentage	Number	Percentage
White alone	7,883	14.9%	384,133	12.0%
Black or African American alone	14,067	31.5%	342,247	26.7%
American Indian and Alaska Native	109	80.7%	3,247	22.2%
alone				
Asian alone	543	20.4%	10,369	14.9%
Native Hawaiian and Other Pacific	5	2.3%	636	22.9%
Islander alone				
Some other race alone	274	19.5%	23,459	32.5%
Two or more races	331	17.1%	26,566	27.0%
Hispanic or Latino (of any race)	744	16.0%	73,604	28.6%
Source: 2013-2017 American Community Sur	vey (S1701)			

Table: Residential Construction Permits Issued

	1-Unit		2-Units		3-4 Units		5+ Units		Total	
	#	PPU	#	PPU	#	PPU	#	PPU	#	PPU
2010	203	\$128,715.14	0	N/A	0	N/A	96	\$46,793.13	299	\$102,412.42
2011	199	\$191,212.78	4	\$59,055.00	0	N/A	48	\$55,000.00	251	\$163,058.02
2012	198	\$141,433.53	0	N/A	0	N/A	271	\$48,928.50	469	\$87,981.80
2013	179	\$211,535.23	0	N/A	0	N/A	0	N/A	179	\$211,535.23
2014	204	\$198,792.83	4	\$89,500.00	0	N/A	338	\$66,357.34	546	\$116,008.28
2015	220	\$155,104.21	62	\$112,453.56	4	\$90,000.00	222	\$70,942.06	508	\$112,606.66
2016	251	\$198,593.55	0	N/A	0	N/A	0	N/A	251	\$198,593.55
2017	341	\$212,037.53	8	\$133,558.50	0	N/A	0	N/A	349	\$210,238.58
2018	449	\$186,818.77	28	\$48,784.11	0	N/A	0	N/A	477	\$178,716.11
Total/Average	2,244	\$183,047.79	106	\$94,346.83	4	\$90,000.00	975	\$60,071.47	3,329	\$144,094.23
Source: US Census	Bureau, I	Building Permits S	urvey,	PPU = Price Per l	Jnit				•	

Table: Home Values

	2010		20:	17	Change (#)	Change (%)
	Number	%	Number	%		
Less than \$50,000	1,048	4.8%	1,101	5.3%	53	0.5%
\$50,000 to \$99,999	4,626	21.1%	3,569	17.1%	-1,057	-4.0%
\$100,000 to \$149,999	4,771	21.7%	4,436	21.2%	-335	-0.5%
\$150,000 to \$199,999	3,575	16.3%	3,109	14.9%	-466	-1.4%
\$200,000 to \$299,999	3,148	14.3%	3,210	15.4%	62	1.1%
\$300,000 to \$499,999	2,896	13.2%	3,158	15.1%	262	1.9%
\$500,000 to \$999,999	1,642	7.5%	2,044	9.8%	402	2.3%
\$1,000,000 or more	264	1.2%	262	1.3%	-2	0.1%

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Total Units	21,970	100.0%	20,889	100.0%	-1,081	0.0%
Data Source: 2006-2010 & 20	13-2017 Am	erican Com	munity Surve	y 5-Year Esti	mates (DP04)	

Table: Rent

	201	LO	201	L7	Change (#)	Change (%)
	Number	%	Number	%		
Less than \$500	4,037	17.8%	2,904	12.0%	-1,133	-5.8%
\$500 to \$999	14,281	63.0%	13,222	54.5%	-1,059	-8.5%
\$1,000 to \$1,499	3,707	16.40%	6,389	26.3%	2,682	9.9%
\$1,500 or more	642	2.80%	1,760	7.2%	1,118	4.4%
Total Units	22,667	100.0%	24,275	100%	1,608	
Data Source: 2006-2010 & 20	13-2017 Am	erican Com	munity Surve	y 5-Year Esti	mates (DP04)	