

Fair Housing Equity Assessment

July 2013



The Metropolitan St. Louis Equal Housing and
Opportunity Council

The East-West Gateway Council of Governments (EWG) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which EWG receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with EWG. Any such complaint must be in writing and filed with EWG's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please see our web site at <http://www.ewgateway.org/TitleVI/titlevi.htm> or call (314) 421-4220 or (618) 274-2750.



Fair Housing Equity Assessment

July 2013



The Metropolitan St. Louis Equal Housing and Opportunity Council is a private nonprofit fair housing organization that works to ensure equal access to housing and places of public accommodation for all people through education, counseling, investigation, and enforcement of fair housing and public accommodation laws. EHOC is a member of the National Fair Housing Alliance and the National Community Reinvestment Coalition

By: Elisabeth Risch, Education & Research Coordinator

Contributors: Kamal Ganjalikhani, Research Fellow, Eric Kohring, Fair Housing Accessibility Specialist, and Will Jordan, Executive Director.

The work that provided the basis of this publication was supported by funding under an award with the U.S. Department of Housing and Urban Development through East-West Gateway Council of Governments. The substance and findings of the work are dedicated to the public. The author and publisher are solely responsible for the accuracy of the statements and interpretations contained in this publication. Such interpretations do not necessarily reflect the views of the Government or East-West Gateway.



Table of Contents

Introduction	i
1 Background	1
2 Segregated Areas and Areas of Increasing Diversity.....	5
3 Racially Concentrated Areas of Poverty (RCAP).....	37
4 Disparities in Access to Opportunity.....	65
5 Fair Housing Enforcement Infrastructure.....	97
6 Physical Infrastructure.....	107
7 Major Findings and Recommendations	115
Appendix	
Appendix 1: FHEA Bridge	121
Appendix 2: FHEA Data Documentation	See digital version at OneSTL.org



Introduction

The intent of Congress in passing the Fair Housing Act was to replace segregated neighborhoods with “truly integrated and balanced living patterns.”¹ The federal Fair Housing Act was first passed in 1968 that prohibited discrimination in housing and housing-related transactions on the basis of race, color, religion, and national origin. Subsequent amendments in 1974 and 1988 added protections for gender, familial status, and disability.² As part of the Fair Housing Act, there is a mandate to

undo patterns of segregation and discrimination by ‘affirmatively furthering fair housing.’ All programs and activities that receive federal funding for housing and urban development are required to be administered in a way that affirmatively furthers fair housing.³

In October 2010, the St. Louis region was awarded a \$4.7 million planning grant through the Sustainable Communities Planning Grant program administered by the U.S. Department of Housing and Urban Development (HUD), the Environmental Protection Agency (EPA), and the Department of Transportation (DOT).⁴ The planning process in the

St. Louis region is undertaken by the Regional Plan for Sustainable Development (RPSD), a partnership of 11 core partners and hundreds of additional partners from a variety of public, private, and non-profit organizations. The goal of the three-year planning process is to create a regional plan that builds the capacity of local and regional leaders to implement sustainable practices by sharing knowledge, best practices, and resources; connecting local, regional, state, and federal planning efforts; and making federal and local investments more effective and efficient.⁵

Recognizing that communities cannot be sustainable if segregation and racial disparities continue to exist, the sustainable communities planning process requires a regional approach to furthering fair housing. As part of the planning process, the RPSD is required to conduct a Fair Housing Equity Assessment (FHEA). This assessment is designed to address issues of racial disparities and access to opportunities throughout the St. Louis region. The FHEA is an opportunity to address these issues on a regional scale with a collaborative approach through the RPSD. The FHEA involves not just data analysis and evaluation, but

1 *Trafficante v. Metro. Life Ins. Co.*, 409 U.S. 205, 211 (1972).

2 42 U.S.C. §§ 3601 - 3619.

3 Section 808(d) and Section 808(e)5, 42 U.S.C. §§ 3601 - 3619.

4 RPSD Background, <http://www.ewgateway.org/rpsd/RPSD-AboutUs/RPSD-History/rpsd-history.htm>.

5 Regional Plan for Sustainable Development FAQ, rvs. January 2012, <http://www.ewgateway.org/rpsd/RPSDFaq.pdf>.

the engagement of such data that informs strategy development and planning in order to address ways of creating inclusive and sustainable communities.⁶

The FHEA report includes seven chapters that focus on a different topic and issue that affects communities of color.⁷

Chapter 1: Background, provides information on the demographics and the current fair housing issues in the St. Louis region.

Chapter 2: Segregated Areas and Areas of Increasing Diversity, examines residential racial segregation and discusses the factors that continue to perpetuate segregation. Chapter 3: Racially Concentrated Areas of Poverty, identifies those areas in the St. Louis region and discusses the challenges and consequences for each area that have an

impact on the entire region.

Chapter 4: Disparities in Access to Opportunity, analyzes differences in opportunity indicators by race and ethnicity, as well as geographically. This chapter also identifies *areas of opportunity* that have high opportunity indicators and examine the need to increase access to such areas.

Chapter 5: Fair Housing Enforcement Infrastructure, examines systemic fair housing issues, individual reports of discrimination, and the capacity within the region to address fair housing discrimination. Chapter 6 focuses on physical infrastructure and the current or upcoming major changes to the region in transportation, economic development and housing and the effect on access to opportunity for communities of color.

The final chapter, Major Findings and Recommendations, lays out the major findings of previous sections and suggests recommendations to address the issues identified in the FHEA. The recommendations and corresponding action steps were developed and refined through engagement with committees of the RPSD. The strategies identified in this section provide a road map for the RPSD and partners to engage with the findings of the FHEA and adopt actions that will work to address the major issues of racial disparities in the St. Louis region. This final step is considered the 'bridge' that connects the findings of the FHEA data analysis into the decision-making for the final regional plan for sustainability (See Appendix 1).⁸

6 FHEA Program Guidance final, HUD memo, January 2012.

7 Chapters were developed using guidance from HUD through Fair Housing Equity Assessment and Regional AI Webinar Series, February – April 2012.

8 FHEA Final Program Guidance, Memo from HUD, January 2012.



1

Background

Background

The FHEA is designed to address issues of equity and access to opportunity within the greater St. Louis region. This analysis will identify and discuss the significant racial and ethnic disparities in housing, transportation, economic development, and public investments. The first chapter of the FHEA will provide background data and information on the St. Louis region that provides a context for the subsequent analysis of fair housing opportunities, including demographics, fair housing successes and challenges faced by the region.

Demographics

For the purposes of this report, the St. Louis region includes the following counties: St. Louis, St. Charles, Franklin, and Jefferson counties and the city of St. Louis in Missouri, and Madison, Monroe, and St. Clair counties in Illinois. All data, unless otherwise noted, uses this geographic definition for the St. Louis region. Throughout this study, the terms white, black and/ or African-American, Asian, Hispanic, American Indian/

Alaska Native, and Native Hawaiian/ Pacific Islander are used consistent with the practices and data of the U.S. Census Bureau.

The eight counties in the St. Louis region vary widely, including rural areas, large suburbs, and dense urban areas. The racial and ethnic demographics between counties also vary with the urban core areas having a majority of the minority population and the outlying counties being predominately white.

Overall, the entire region consists of nearly 20 percent African-Americans, 2.3 percent Asians, 2.6 percent Hispanics, and 3.0 percent other minorities. Table 1 displays the population by race and ethnicity by county.

The racial distribution across counties is uneven. St. Louis city consists of 49.2 percent African-Americans, St. Clair County consists of 30.5 percent African-Americans, and St. Louis County has 23.3 percent African-American population. All the remaining counties have less than 10 percent African-American population. The largest percentage of Hispanic population is in

St. Louis city and St. Clair County, each with just over 3 percent. Other racial minorities, including Native-American, Pacific Islander, and multi-racial individuals, make up nearly 4 percent of the population in St. Louis city, but are relatively even throughout the other counties. The Asian population is highest in St. Louis city, with 3.5 percent of the population, followed by St. Clair County at 3.3 percent.

Table 1: 2010 Population by Race

	Total Population	White		Black		Asian		Hispanic		Other	
Total	2,571,253	1,922,867	74.8%	511,407	19.9%	59,242	2.3%	67,490	2.6%	77,737	3.0%
St. Louis County	998,954	701,948	70.3%	233,029	23.3%	34,597	3.5%	25,024	2.5%	29,380	2.9%
St. Charles County	360,485	327,018	90.7%	14,960	4.1%	7,850	2.2%	9,983	2.8%	10,657	3.0%
St. Louis City	319,294	140,267	43.9%	157,160	49.2%	9,291	2.9%	11,130	3.5%	12,576	3.9%
St. Clair County	270,056	174,458	64.6%	82,302	30.5%	3,276	1.2%	8,785	3.3%	10,020	3.7%
Madison County	269,282	237,641	88.2%	21,235	7.9%	2,254	0.8%	7,313	2.7%	8,152	3.0%
Jefferson County	218,733	211,007	96.5%	1,798	0.8%	1,417	0.6%	3,408	1.6%	4,511	2.1%
Franklin County	101,492	98,241	96.8%	854	0.8%	413	0.4%	1,397	1.4%	1,984	2.0%
Monroe County	32,957	32,287	98.0%	69	0.2%	144	0.4%	450	1.4%	457	1.4%

Source: 2010 Census

Fair Housing Successes

Efforts to increase access to housing for all people have made a difference in recent decades. Dedicated individuals and organizations have been working to undo the systemic patterns of discrimination and exclusion. The existence of the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) is one such example. EHOC is the only private, non-profit fair housing organization that seeks to ensure equal access to housing through education, counseling, investigation, and enforcement in the St. Louis region. Other partners, such as the National Association for the Advancement of Colored People (NAACP) chapters and fair housing enforcement agencies, have also worked to further the cause of fair housing and civil rights.

Recently, much attention has been focused on banking practices and fair lending in the St. Louis region. Since 2009, there have been three major fair lending cases settled with financial institutions in the St. Louis region because of a lack of bank services in areas with high minority population.⁹ All of these cases alleged discrimination on the basis of race and national origin as African-Americans and Hispanic communities were excluded from residential mortgage lending availability and branch location access. Each of the cases resulted in increased commitment to serve minority communities through products and lending, and also included three new bank branches that have opened in predominately minority neighborhoods.

In addition, greater accountability and enforcement of affirmative duties to further fair housing have been successful in increasing access to housing for all people. The 2009 case *U.S. ex rel. Anti-Discrimination Center v. Westchester County* in Westchester County, NY brought renewed federal attention to the mandate to affirmatively further fair housing.¹⁰ As part of Westchester case, the U.S. Department of Housing and Urban Development (HUD) demonstrated that it is no longer sufficient for communities receiving housing and community development federal funding to continue the status quo and that communities must proactively work to undo the barriers to fair and equal housing for all persons.

In the St. Louis region, the U.S. Department of Housing and Urban Development has increased oversight of affirmatively furthering fair housing obligation by scrutinizing the work of entitlement jurisdictions in analyzing barriers to fair housing through an *analysis of impediments* review process.¹¹

Organizations and community groups have also been more involved in this process by providing input in the Analysis of Impediment and Consolidated Plan process in order to ensure that barriers faced by community members are addressed by local governments. Additional education and outreach materials have been developed in order to educate local jurisdictions and community residents about fair housing and the duty to affirmatively further fair housing.¹²

⁹ See EHOC v. First National Bank of St. Louis, EHOC v. Enterprise Bank and Trust, and U.S. v. Midwest BankCentre.

¹⁰ For more information on the case, see www.antibiaslaw.org.

¹¹ Presentation to EHOC by St. Louis regional field office, Fair Housing and Equal Opportunity, HUD, "Analysis of Impediments: FHED's review" May 2012.

¹² "A Practical Guide and Toolkit for Affirmatively Furthering Fair Housing" Missouri Commission on Human Rights, August 2012. <http://labor.mo.gov/mohumanrights/Forms/AFFHPracticalGuide.pdf>.

Fair Housing Problems

Despite the efforts of civil rights organizations and fair housing enforcement, fair housing issues still exist throughout the region.

Discrimination on the basis of race is the number one type of fair housing complaint in the region over the last five years, as found in Chapter 5: Fair Housing Enforcement Infrastructure, in this report. This indicates a continued issue with racial prejudice and discrimination that continues to occur in housing transactions.

Additionally, systemic issues continue to be a barrier for fair housing in the St. Louis region. As Chapter 5 will discuss in-depth, there is evidence throughout the region of exclusionary zoning practices, identification policies that have a disparate effect on Hispanic families, and discriminatory code enforcement, among others. On a broader level, the issue of racial segregation remains pressing. As later chapters on segregation and disparities in access to opportunity will show, the level of segregation in the St. Louis region is severe and there are significant disparities in poverty rates, employment, and accessing opportunities such as good schools and healthy communities.

2

Segregated Areas and Areas of Increasing Diversity

Segregated Areas, Diversity



The St. Louis metropolitan area continues to be listed as one of the most segregated metropolitan areas in the country.¹³ This chapter examines the demographics of the St. Louis region by race and ethnicity, identifying trends of segregation and areas that are increasingly diverse. The level of segregation in the St. Louis region is measured by analyzing data including the Dissimilarity Index and the Isolation Index. Historical factors that contributed to segregation are discussed in this chapter, as well as factors that continue to perpetuate segregation. In finding that a high level of segregation remains a persistent issue for the St. Louis region, this chapter identifies the need to seriously address segregation and commit to working to undo the patterns that continue today.

Measures of Segregation

Dissimilarity Index

The Dissimilarity Index reflects the relative distribution of race

and ethnicity across neighborhoods.¹⁴ Table 2 displays the Dissimilarity Index in the St. Louis region in 2000 and in 2010 comparing each minority group to the white population. Values range from 0 to 1, with 0 indicating complete integration and 1 indicating complete segregation.¹⁵

The values of the Dissimilarity Index can be categorized as low segregation, moderate segregation, and high segregation.¹⁶ Values lower than 0.40 are categorized as low segregation; values between 0.41 and 0.54 represent moderate segregation; and values higher than 0.55 represent high segregation.

The share of population displayed in Table 2 is the percentage of the racial or ethnic group in the region's population, shown both for 2000 and 2010. The non-white population in St. Louis has been increasing over the last ten years. The Hispanic and Asian population percentages have both increased substantially. In 2000, Hispanics represented

1.54 percent, and in 2010 they represent 2.62 percent. The Asian population increased from 1.54 percent in 2000 to 2.29 percent in 2010. The African-American population increased slightly from 19.01 percent in 2000 to 19.78 percent in 2010.

The highest dissimilarity index in the St. Louis region is black/white segregation. Since 2000, black/white segregation has slightly improved, with the dissimilarity index going from 0.76 in 2000 to 0.74 in 2010.

Non-white/white segregation is also considered high, partly because of the high percentage of African-American population and the high degree of segregation between blacks/whites. In 2010, the dissimilarity index is 0.60 for non-white/white. Compared to the dissimilarity index in 2000, which at 0.65 is also considered high, segregation has lessened over the last ten years.

Table 2: Race/Ethnic Segregation and Dissimilarity Index

	Share of Population		Dissimilarity Index*	
	St. Louis Region 2000	St. Louis Region 2010	St. Louis Region 2000	St. Louis Region 2010
Non-White	23.48%	26.68%	0.65	0.60
Black-African-American	19.01%	19.78%	0.76	0.74
Hispanic	1.54%	2.62%	0.32	0.34
Asian	1.47%	2.29%	0.47	0.46
Pacific-Islander	0.20%	0.20%	0.38	0.39
Native-American	0.02%	0.03%	0.00	0.00

Source: HUD FHEA data
*compared to white population

13 John R. Logan and Brian Stults. 2011. "The Persistence of Segregation in the Metropolis: New Findings from the 2010 Census" Census Brief prepared for Project US2010. <http://www.s4.brown.edu/us2010> .
14 The Dissimilarity Index used in this report was provided by HUD as part of the data package to assist grantees with the FHEA. Data was downloaded from the HUD FHEA Data Excel look-up tool on August 2012 from www.huduser.org/portal/sustainability/grantees/data.html. This data is for the eight county region defined in this report.
15 Census Scope - <http://www.censusscope.org/segregation.html> .
16 FHEA Data Documentation, HUD, August 2012, page 3 (See Appendix 2).

The other minority groups have low to moderate levels of segregation. The Asian population has a moderate level of segregation, with the dissimilarity index in 2010 at 0.46. This has slightly decreased since 2000, when the dissimilarity index was 0.47. Hispanic/white dissimilarity index is 0.34 in 2010, which categorizes as low segregation. However, this index has increased since 2000 when the Hispanic/white dissimilarity index was at 0.32.

Considering that the white population and the black population account for nearly 95 percent of the total population in the region, the segregation index among

black/white is the most telling indicator of segregation patterns in the region.

Although the dissimilarity index is high for black/white segregation, the dissimilarity index has been declining prior to the last decade. According to analysis at US2010, the St. Louis MSA has continued a decline in the segregation index over the last thirty years. The black/white dissimilarity index in 1980 was 0.81, which declined in 1990 to 0.77.¹⁷

Nationally, the St. Louis metro area is still considered one of the top segregated areas in the country. According to the US2010 report by John Logan and Brian Stults, the St. Louis metro area is ranked 9th highest in black/white segregation on the dissimilarity index of the 50 metro areas with the largest black population in 2010.¹⁸ Detroit, MI and Milwaukee, WI were the two metropolitan areas in 2010 with the highest dissimilarity index between black/white populations at 0.79 according

to US2010. The St. Louis metro area compares similarly to Cleveland, OH, with a slightly higher black/white dissimilarity index, and Nassau-Suffolk, NY metro area just below St. Louis among the top 50 metro areas with the largest black population.¹⁹

The US2010 report points out that the top ten metro areas with the highest black/white dissimilarity index are in areas where segregation has been most resistant to change. The report notes that while there are some decreases in the dissimilarity index numbers, the declines are generally slight over the last thirty years.²⁰ Detroit and New Orleans did experience a substantial decrease in the segregation measures, but due to severe population decreases particularly among African-Americans.²¹ The US2010 report does highlight one positive and unique trend in Kansas City metro area's segregation patterns among black and white population, particularly in the last decade. The black/white segregation

in the Kansas City metro area in 2010 was 0.58, which is a nearly 11 point decrease from the 2000 index of 0.69.²² The St. Louis region, and many of the other top metro areas, did not experience that same dramatic decrease.

Isolation Index

Another common measure of segregation is the Isolation Index.²³ The Isolation Index is a type of exposure index, which demonstrates how a particular racial or ethnic minority group is concentrated in neighborhoods with members in the same group. The Isolation Index compares a group's population share in the region to the average block group share for that same population group.²⁴ This takes into account the size of a particular group, so it's particularly relevant in St. Louis to measure segregation considering the smaller minority groups such as Hispanics, Asians, and others.

17 US2010, Residential Segregation data, Spatial Structures in the Social Sciences, Brown University, <http://www.s4.brown.edu/us2010/segregation2010/msa.aspx?metroid=41180>, accessed Nov 1, 2012.

Note: This research demonstrates a slightly different dissimilarity index, but that could be due to differences in the geographical boundaries of the St. Louis Region as defined in this study and the boundaries of the metropolitan area.

18 Logan, John R. and Brian Stults. 2011. "The Persistence of Segregation in the Metropolis: New Findings from the 2010 Census" Census Brief prepared for Project US2010. <http://www.s4.brown.edu/us2010/Data/Report/report2.pdf>.

19 Ibid. Page 6.

20 Ibid. Page 5.

21 Ibid. Page 6.

22 Ibid.

23 The Isolation Index was provided in the HUD FHEA dataset in the Excel look-up file downloaded August 2012.

24 FHEA Data documentation. 2012.

Table 3 displays the Isolation Index for the St. Louis region in 2000 and 2010. The percent of the share of each population group is also represented under share of population columns. As with the Dissimilarity Index, the higher the isolation index, the higher the degree of segregation. Values are from 0 to 1, with 0 being integration and 1 being complete segregation. African-Americans have the highest degree of segregation in the St. Louis region. In 2010, the isolation index for African-Americans is 0.45. This has slightly decreased since 2000, where the isolation index for blacks was 0.48.

The isolation index is much smaller for Hispanic, Asian, and other minority groups. In 2010, the isolation index for Hispanics is 0.04 and the isolation index for Asians is 0.05. However, the isolation index for both groups—Hispanic and Asian—has increased since 2000.

Nationally, St. Louis region ranks 11th in isolation index for the black population in the 50 metropolitan areas with

the largest black population, according to the US2010 report.²⁵ The US2010 report documents the black isolation index for the St. Louis metro area at 0.62 in 2010.²⁶ Detroit, MI is the area with the highest black isolation in 2010 with 0.80. The St. Louis metro area’s black isolation index compares closely to Baltimore, MD and Baton Rouge, LA that have isolation indexes just above and below the St. Louis metro area.²⁷

Visualizing Segregation

Patterns of racial segregation in St. Louis are visually obvious in looking at a map of the region of population by race. Map 1 displays the 2010 population by race.

A closer look at the details of the dot density map in Map 2 highlights interesting trends on a smaller scale, particularly in the urban core areas. The map below shows the minority population is concentrated in the urban core areas, but also has segregation patterns across the areas with larger proportion of diversity. The areas of north St. Louis

Table 3: Race/Ethnic Segregation and Isolation Index

	Share of Population		Isolation Index	
	St. Louis Region 2000	St. Louis Region 2010	St. Louis Region 2000	St. Louis Region 2010
Non-White	23.48%	26.68%	0.39	0.33
Black-African-American	19.01%	19.78%	0.48	0.45
Hispanic	1.54%	2.62%	0.03	0.04
Asian	1.47%	2.29%	0.03	0.05
Pacific-Islander	0.20%	0.20%	0.00	0.00
Native-American	0.02%	0.03%	0.00	0.00

Source: HUD FHEA data

city and north St. Louis County are overwhelmingly African-American. The northwest section of St. Clair County in Illinois, containing East St. Louis, also is almost exclusively African-American.

The north-south separation of black and white in St. Louis city and St. Louis County is clear on the map, which roughly follows Delmar Boulevard. This racial divider line is common knowledge among those in St. Louis and is obvious even to those not in St. Louis. In March 2012, the BBC aired a segment as part of *Altered States* that featured Delmar as the dividing line when it comes to income, race, education, and how the neighborhood looks.²⁸

Areas in north St. Louis County also display an east-west separation, although not as stark as the north-south boundary between the white and black populations. This is especially true in areas around Florissant and Ferguson and other municipalities in north St. Louis County where the black population gradually decreases toward the west as the white population increases.

25 Logan, John R. and Brian Stults. Page 8.

26 The difference in the isolation index between the US2010 report and this report could be due to geographic differences.

27 Logan, John R. and Brian Stults. Page 8.

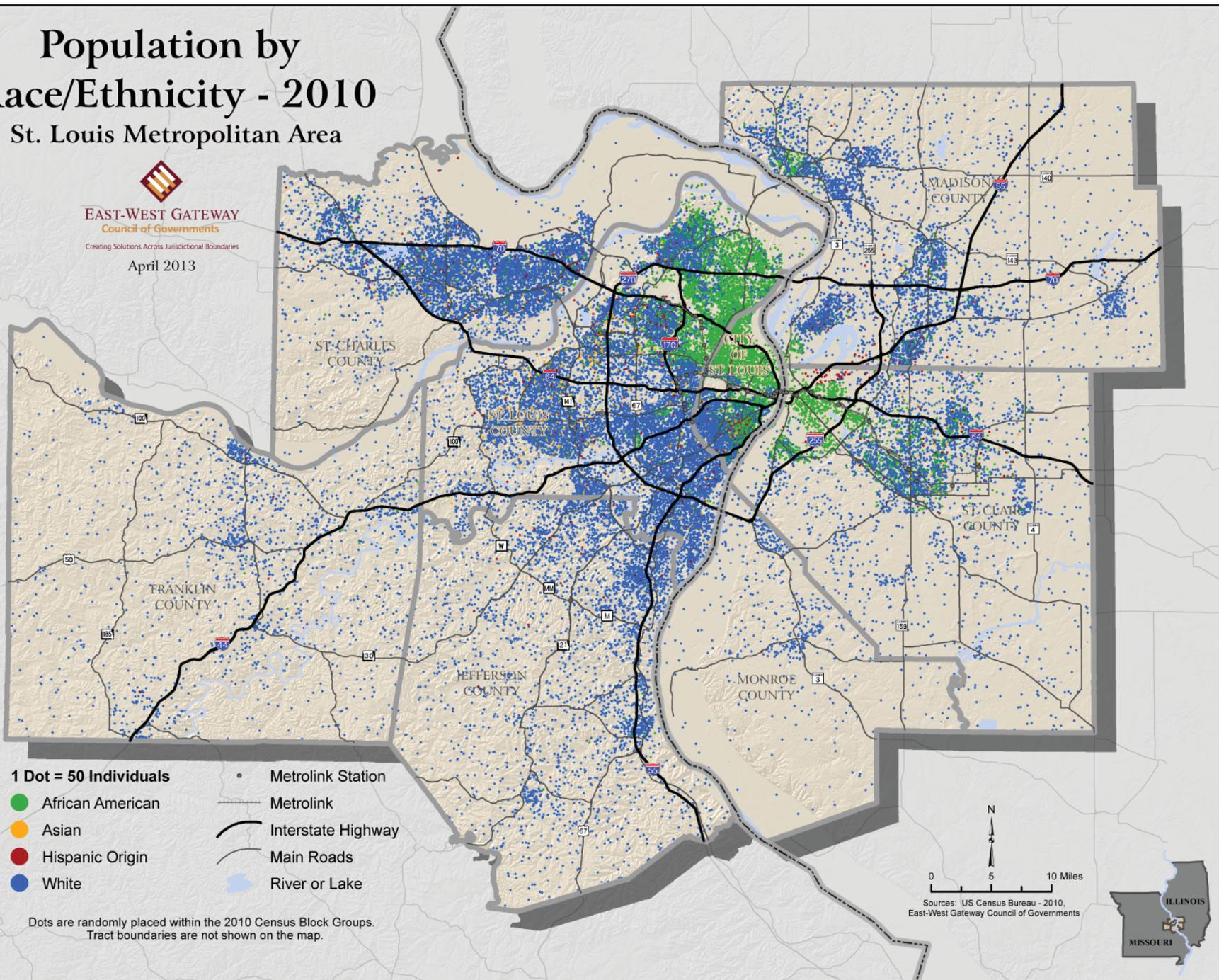
28 “Crossing a St. Louis street that divides communities” BBC News, *Altered States*. March 13, 2012, <http://www.bbc.co.uk/news/magazine-17361995>.

Map 1:

Population by Race/Ethnicity - 2010

St. Louis Metropolitan Area


EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries
April 2013



1 Dot = 50 Individuals

- African American
- Asian
- Hispanic Origin
- White

- Metrolink Station
-  Metrolink
-  Interstate Highway
-  Main Roads
-  River or Lake

Dots are randomly placed within the 2010 Census Block Groups.
Tract boundaries are not shown on the map.

0 5 10 Miles
Sources: US Census Bureau - 2010,
East-West Gateway Council of Governments



Segregated Areas, Diversity

Areas farthest away from the center and more urban areas of St. Louis city and St. Louis County are all predominately white, including most areas in St. Charles, Franklin, Jefferson counties in Missouri, and areas farthest east in Madison, Monroe and St. Clair counties in Illinois. St. Louis city is relatively integrated in the middle and south parts of the city, including black, Hispanic, and Asian populations. Areas farther south in St. Louis city are less diverse with more predominately white areas. The areas farthest south in St. Louis city and into south St. Louis County are overwhelmingly white.

Hispanic population is relatively evenly distributed over the region, although there are concentrated pockets. These areas include south St. Louis city, areas of St. Louis County around Olivette and Overland, and the largest concentration in Fairmont City in St. Clair County and north to Madison County. The Asian population is also dispersed among mostly St. Louis city and St. Louis County.

Map 2:

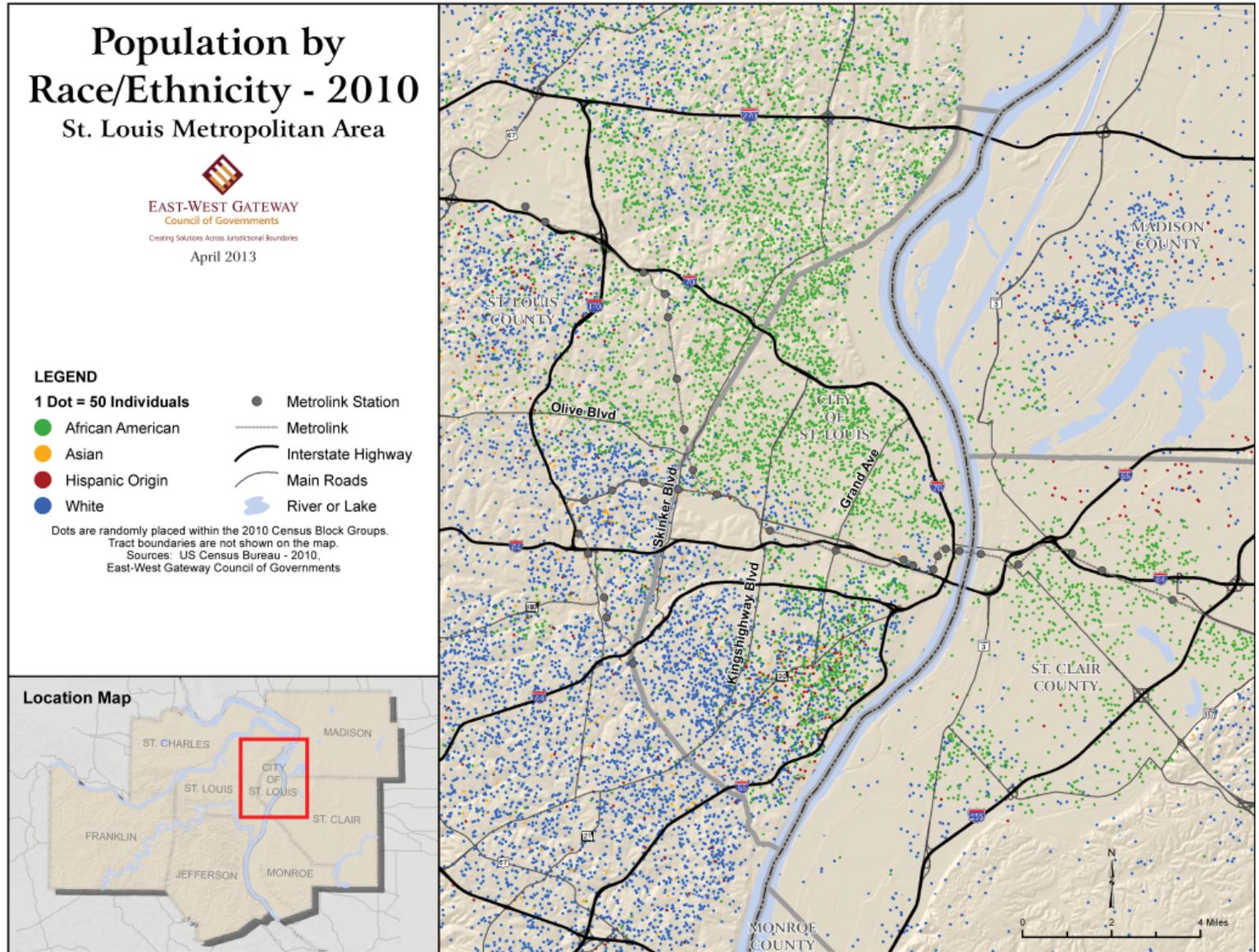


Table 4.1: Change in Population by Race

	Total Population			White Population			Black Population		
	2000	2010	Percent Change	2000	2010	Percent Change	2000	2010	Percent Change
Regional Total	2,482,935	2,571,253	3.6%	1,921,684	1,922,867	0.1%	474,058	511,407	7.9%
St. Louis County	101,6315	998,954	-1.7%	780,830	701,948	-10.1%	193,306	233,029	20.5%
St. Charles County	283,883	360,485	27.0%	268,756	327,018	21.7%	7,635	14,960	95.9%
St. Louis City	348,189	319,294	-8.3%	152,666	140,267	-8.1%	178,266	157,160	-11.8%
St. Clair County	256,082	270,056	5.5%	173,970	174,458	0.3%	73,666	82,302	11.7%
Madison County	258,941	269,282	4.0%	233,645	237,641	1.7%	18,935	21,235	12.1%
Jefferson County	198,099	218,733	10.4%	193,102	211,007	9.3%	1,354	1,798	32.8%
Franklin County	93,807	101,492	8.2%	91,436	98,241	7.4%	882	854	-3.2%
Monroe County	27,619	32,957	19.3%	27,279	32,287	18.4%	14	69	392.9%

Source: 2000 and 2010 Census

Table 4.2: Change in Population by Race

Region	Asian Population			Hispanic Population			Other Population		
	2000	2010	Percent Change	2000	2010	Percent Change	2000	2010	Percent Change
Region	36,818	59,242	60.9%	38,187	67,490	76.7%	50,375	77,737	54.3%
St. Louis County	22,606	34,597	53.0%	14,577	25,024	71.7%	19,573	29,380	50.1%
St. Charles County	2,414	7,850	225.2%	4,176	9,983	139.1%	5,078	10,657	109.9%
St. Louis City	6,891	9,291	34.8%	7,022	11,130	58.5%	10,366	12,576	21.3%
St. Clair County	2,322	3,276	41.1%	5,604	8,785	56.8%	6,124	10,020	63.6%
Madison County	1,542	2,254	46.2%	3,925	7,313	86.3%	4,819	8,152	69.2%
Jefferson County	708	1,417	100.1%	2,002	3,408	70.2%	2,935	4,511	53.7%
Franklin County	249	413	65.9%	678	1,397	106.0%	1,240	1,984	60.0%
Monroe County	86	144	67.4%	203	450	121.7%	240	457	90.4%

Source: 2000 and 2010 Census

Predicted Racial/Ethnic Composition

The predicted racial/ethnic composition data is used to compare the actual population of minorities in a specific geographical area to the predicted population share based on the area’s economic profile.²⁹ The predicted values are based on the income distribution by race and ethnicity and the number of households within that jurisdiction.³⁰ The purpose of this analysis is to answer the question, “given the current household income characteristics for each jurisdiction, what would we expect the racial/ethnic composition to look like?” This dataset was compiled by HUD using U.S. Census data for smaller divisions of an area.³¹ The ratio of the actual versus the predicted demonstrates the level of diversity.

A value of the actual/predicted ratio under 100 percent means the racial and ethnic group is underrepresented. Actual/predicted ratio values are categorized as extremely below predicted if under

Tables 4.1 and 4.2 display the change in population by county over the last decade. Since 2000, the total population has decreased in St. Louis County and St. Louis city. In St. Louis County, the white population decreased by 10 percent, while the black population increased by 20 percent. St. Louis city saw a decrease in both the black (-11.8 percent) and white population (-8.1 percent). This trend indicates that more black families are moving into St. Louis County, while white families are moving out of St. Louis County. All families—white and black—continue to move from St. Louis city.

St. Charles County experienced the highest overall growth in population, with a 27 percent increase in population. This growth included an increase in the white population, as well as a substantial increase in the African-American population, Asian, Hispanic, and other minority populations.

29 FHEA HUD dataset. Downloaded August 2012.

30 FHEA Data Documentation. 2012. Page 3.

31 Note that for the St. Louis region, HUD used census-designated places so that many of the municipalities are covered by multiple townships in each county. The dataset made it difficult to capture a complete picture of each municipality or neighborhood because of these geographic designations.

50 percent, moderately below predicted if between 50 and 70 percent, slightly below predicted if between 70 and 90 percent, approximates predicted if between 90 and 110 percent, and above predicted if 110 percent and above.

The predicted racial/ethnic composition for the below jurisdictions represent a sample of areas that have particularly striking statistics and were identified based on observations from the maps in visualizing segregation and the available data provided for this measure.³²

St. Louis City (Table 5.1) has the largest portion of its population that is non-white. According to the predicted statistics, non-white population in St. Louis city should be nearly 30 percent with 24.2 percent black, 1.9 percent Hispanic and 1.8 percent Asian. In actual figures, the city has more than the predicted share of all minority groups, black, Hispanic, and Asian. The total non-white actual/predicted ratio is 179 percent.

Ladue (Table 5.2) is located in St. Louis County.³³ Strikingly, there is 0.0 percent African-Americans or Hispanics reported in this jurisdiction. Using income indicators, the predicted share of African-Americans and Hispanics is 9.4 percent and 1.5 percent, respectively. The actual/predicted ratio for both African-Americans and Hispanics is 0, an extremely low value. Ladue does have an Asian population well above the predicted share.

East St. Louis, (Table 5.3) in St. Clair County is 98.2 percent African-American. Based on the predicted values using income levels, African-Americans are predicted to be only 29.6 percent of the population. The actual/predicted ratio of African-Americans is 332 percent.

Table 5.1: Predicted/Actual Race/Ethnicity St. Louis City, Missouri

	Actual Share	Predicted Share	Actual/Predicted
Black-African-American	45.9%	24.2%	189.5%
Hispanic or Latino	2.3%	1.9%	117.9%
Asian	2.5%	1.8%	137.9%
Non-White	52.2%	29.2%	179.0%

Source: HUD FHEA data

Table 5.2: Predicted/Actual Race/Ethnicity Ladue city, St. Louis County, Missouri

	Actual Share	Predicted Share	Actual/Predicted
Black-African-American	0.0%	9.4%	0.0%
Hispanic or Latino	0.0%	1.5%	0.0%
Asian	3.8%	2.7%	142.0%
Non-White	3.8%	14.3%	26.6%

Source: HUD FHEA data

Table 5.3: Predicted/Actual Race/Ethnicity East St. Louis city, East St. Louis township, St. Clair County, Illinois

	Actual Share	Predicted Share	Actual/Predicted
Black-African-American	98.2%	29.6%	332.1%
Hispanic or Latino	0.2%	2.0%	8.9%
Asian	0.0%	1.7%	0.0%
Non-White	99.1%	34.7%	285.8%

Source: HUD FHEA data

32 Because the HUD dataset used census-designated places as the geographic boundary, the data set was extremely limited in identifying complete areas.

33 The HUD-created Predicted Racial/Ethnic Composition data uses Place and County Subdivisions as the geographic boundary, which is different than other data analysis boundaries of this report.

Table 6: University City

	2000		2010	
	Population	%	Population	%
Total Population	37,428		35,371	
White	18,437	49.3%	17,954	50.8%
Black	16,974	45.4%	14,535	41.1%
Asian	1,065	2.8%	1,504	4.3%
Hispanic	583	1.6%	979	2.8%

Source: Census 2000 and 2010

Table 7: St. Louis City Central Corridor

	2000		2010	
	Population	%	Population	%
Population:	56,579		61,450	
White	29,206	51.6%	34,049	55.4%
Black	23,809	42.1%	21,496	35.0%
Asian	1,870	3.3%	3,910	6.4%
Hispanic	1,101	1.9%	1,706	2.8%

Source: Census 2010, St. Louis City Planning and Urban Design

Table 8: Alton

	2000		2010	
	Population	%	Population	%
Total Population	30,496		27,865	
White	22,056	72.3%	19,082	68.5%
Black	7,538	24.7%	7,421	26.6%
Asian	115	0.4%	140	0.5%
Hispanic	454	1.5%	536	1.9%

Source: Census 2000 and 2010

Areas of Increasing Diversity

Some areas in St. Louis are relatively integrated, at least with stable populations of both African-American and white populations. Other areas in the St. Louis area have seen a trend of increasing racial and ethnic diversity. University City, an inner-ring suburb that is the home of a large university, is one area that has relatively integrated demographics. Between 2000 and 2010, University City (Table 6) experienced an increase in the Hispanic population and Asian population.

Parts of St. Louis city are also relatively diverse, and are increasing in diversity. One example is the central corridor (Table 7), as defined as south of Delmar Blvd. and north of I-44.³⁴

This area saw an increase in overall population from 2000, which is an exception from the overall city of St. Louis and many other areas. The population consists of 55

percent white, 35 percent black, 6.4 percent Asian, and 2.8 percent Hispanic. Since 2000, the Hispanic and Asian population has increased dramatically. One concern for this area could be the slight decline in African-American population since 2000. A consideration for neighborhoods undergoing transition is the potential issue of pricing-out and gentrification that often contributes to a declining African-American population.

The city of Alton in Illinois also has a relatively integrated population (Table 8). African-Americans consist of around 25 percent of the population in 2000 and 2010.

These communities, among others, have integrated neighborhoods and should be highlighted as areas of diversity. While many conversations are focused on the difficulty of challenging segregated living patterns, there are examples in our region of communities that have diverse populations. These communities should be encouraged to continue efforts of promoting their

strength as an integrated neighborhood. More research is needed to identify the elements of integrated communities and neighborhoods in the St. Louis region and should be promoted as an educational resource tool.

Contributors to Segregation

Segregation in the St. Louis region can be traced back to racially driven policies and practices that have historically excluded and restricted African-Americans and other minorities from freely choosing where they want to reside. These policies and practices are the result of a time in the country's history when such policies and practices were legislatively intended to be legal and enforceable. In contrast, there were other more subtle policies and practices that effectively restricted access for minority families. For example, in St. Louis, as in many other cities and communities across the nation, there were policies in the urban core that forced African-Americans to certain neighborhoods,

³⁴ Census Results, by corridor. The city of St. Louis, Planning and Urban Design Agency, <http://dynamic.stlouis-mo.gov/census/corridor.cfm>.

and policies of the suburban and rural communities that kept minorities out of those communities. As evidenced by the continued high levels of segregation, these restrictions and exclusions have had a major effect on St. Louis.

The effect of the restrictions and exclusions can also be seen in the existence and location of the racially concentrated areas of poverty (RCAP) and areas of opportunity identified by this report. RCAPs are areas with high poverty rates and a non-white majority population, while areas of opportunity have high access to schools, jobs, and transportation with low exposure to environmental health hazards and a low poverty rate (see Chapters 3 and 4 for further information about RCAPs and areas of opportunity). In the remaining sections of this chapter, the racially driven policies and practices that contributed to segregation are identified and, when possible, they are compared with the location of the RCAPs and areas of opportunity.

History of Exclusion

Sundown Towns

Explicit laws banning African-Americans from living in certain communities has had an effect on segregation today. According to research by James Loewen, “sundown towns” were communities that kept out African-Americans by force, law, or custom. Some of these communities were “sundown towns” into the 1970s.³⁵ The term “sundown towns” comes from signs that were commonly placed at city limits reading “nigger, don’t let the sun go down on you in [inserted name of town].” Loewen’s research found a staggering 440 probable sundown towns in Illinois, including communities now considered part of the St. Louis metropolitan area, and thousands more across the country. These towns are often still predominately, if not exclusively, white.

Restrictive Covenants

In 1916, St. Louis city passed an ordinance that no one could move to a block that was more than 75 percent of another race.³⁶ This ordinance

designated “Negro blocks” in pockets of St. Louis as the places where African-Americans could live. In 1917, the Supreme Court ruled in *Buchanan v. Warley* against a similar restrictive ordinance, and this law was struck down.³⁷

After the Supreme Court ruled that local governments could not implement restrictive segregation ordinances, individuals and organizations implemented their own more localized versions. Restrictive covenants became a popular method of protecting a neighborhood from African-Americans moving further into white communities. In St. Louis, the north side of St. Louis city was organized block by block with restrictive covenants banning the sale of a property to non-whites. The local realtors association, the St. Louis Real Estate Exchange, promoted the use of restrictive covenants and provided a model restrictive covenant that was widely used in St. Louis.³⁸ Real estate agents helped organize “neighborhood improvement associations” in areas threatened by “invasion” of

African-Americans,³⁹ and then provided legal advice and assistance in drafting the restrictive covenants. Map 3 displays the restrictive covenants in St. Louis in 1945 along with the racially concentrated areas of poverty identified in this report. The covenants created and maintained boundaries around the existing African-American community in north St. Louis city, preventing African Americans from moving further west.⁴⁰ In addition to its support of restrictive covenants, the St. Louis real estate exchange used realtor’s agreements to establish an unrestricted zone, first in 1923 and again in 1940, which defined the areas where its member realtors were permitted to sell or lease to African-Americans. Selling or leasing property to African Americans outside of the “unrestricted zone” was considered professional misconduct and put realtors at risk of losing

35 “Sundown Towns” by James W. Loewen, <http://sundown.afro.illinois.edu/sundowntowns.php>, last accessed 12/10/12 .

36 Gordon, Colin. *Mapping Decline: St. Louis and the Fate of the American City*. University of Pennsylvania Press, 2008. Page 71.

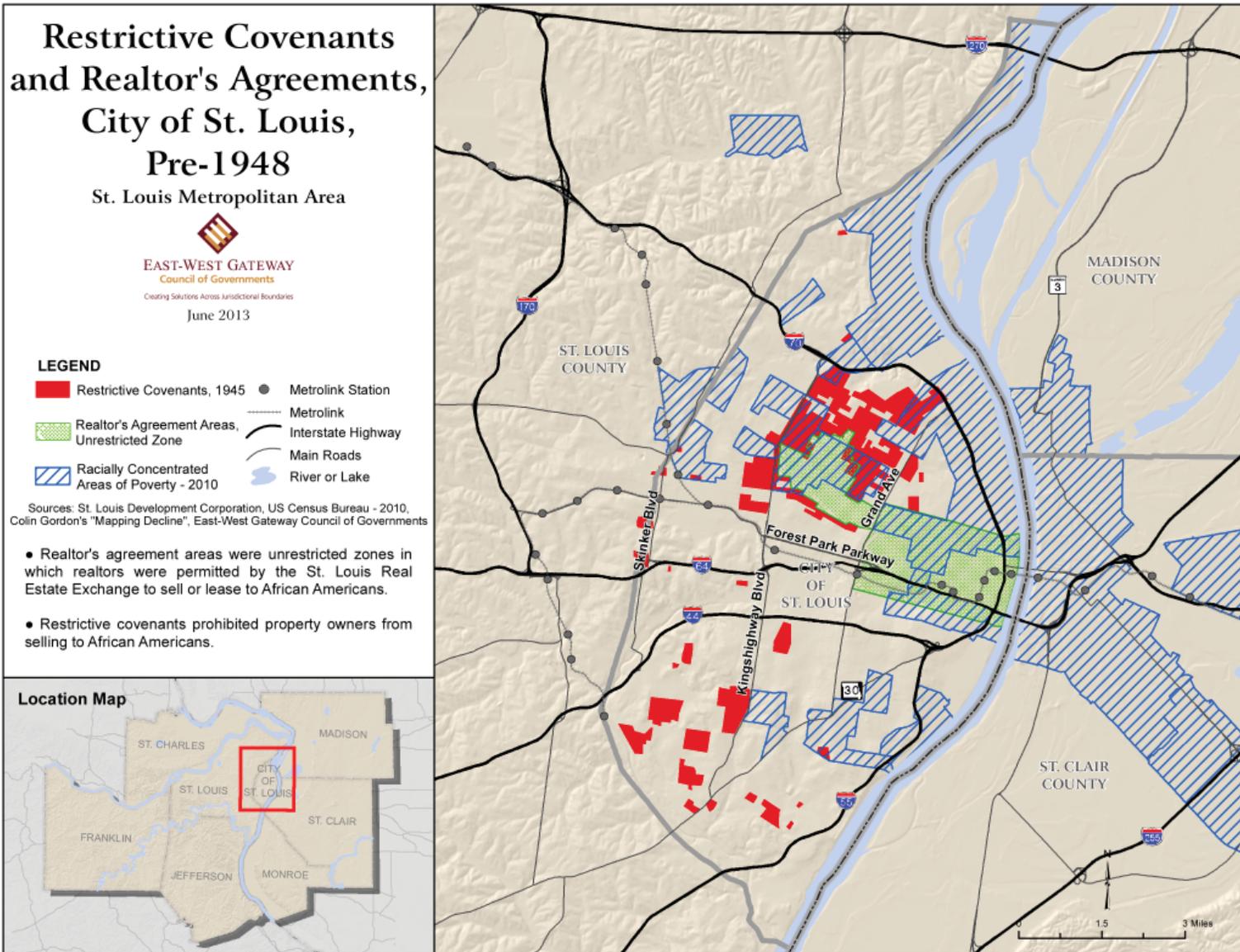
37 *Buchanan v. Warley* - 245 U.S. 60 (1917).

38 Gordon, Colin. pg. 79

39 Gordon, Colin. pg. 73

40 Gordon, Colin. pg. 78

Map 3:



their license.⁴¹ The combined 1923 and 1940 unrestricted zone is displayed on Map 3, and reveals how the real estate industry and private property owners created a system that confined African-Americans to particular locations in the city. Several of the racially concentrated areas of poverty overlap with the unrestricted zone established by the Exchange, and others overlap with areas that were formerly protected by restrictive covenants.

Though maps are not available for the Illinois side, restrictive covenants were also used in Illinois to concentrate African-Americans in East St. Louis and along the riverfront near downtown St. Louis.

Challenges to the constitutionality of restrictive covenants began around the 1940s, including the 1948 landmark *Shelley v. Kramer* case from the north St. Louis neighborhood of the Ville. In *Shelley v. Kraemer*, the Supreme Court found that restrictive covenants were not enforceable by the courts.⁴² However, restrictions to housing for African-Americans

Segregated Areas, Diversity

41 Gordon, Colin. pg. 84

42 *Shelley v. Kramer*, 334 US 1 - 1948.

continued through private efforts of deed covenants and discriminatory racial preferences.

Even without official restrictive covenants, individuals refused to sell or rent to African-Americans. However, in 1968 the Supreme Court ruled in *Jones v. Mayer*—another landmark case from St. Louis—that private acts of discrimination in the sale and rental of property violated the Civil Rights Act of 1866. The case originated in the predominately white suburb of Paddock Hills in St. Louis County when Alfred Mayer refused to sell property to Joseph Jones, a black man.⁴³ Earlier in that year, 1968, the Fair Housing Act was passed that prohibited discrimination in housing and housing-related transactions on the basis of race, color, religion, and national origin. Despite the court rulings and the passage of a federal law, discriminatory housing practices that refuse African-Americans equal access continue today as evidenced by fair housing complaints on the basis of race.

The number of fair housing complaints filed every year is only a small proportion of actual discrimination occurring across the country. The National Fair Housing Alliance estimates that 4 million instances of discrimination occur every year nationwide.⁴⁴

Federal Housing Policies

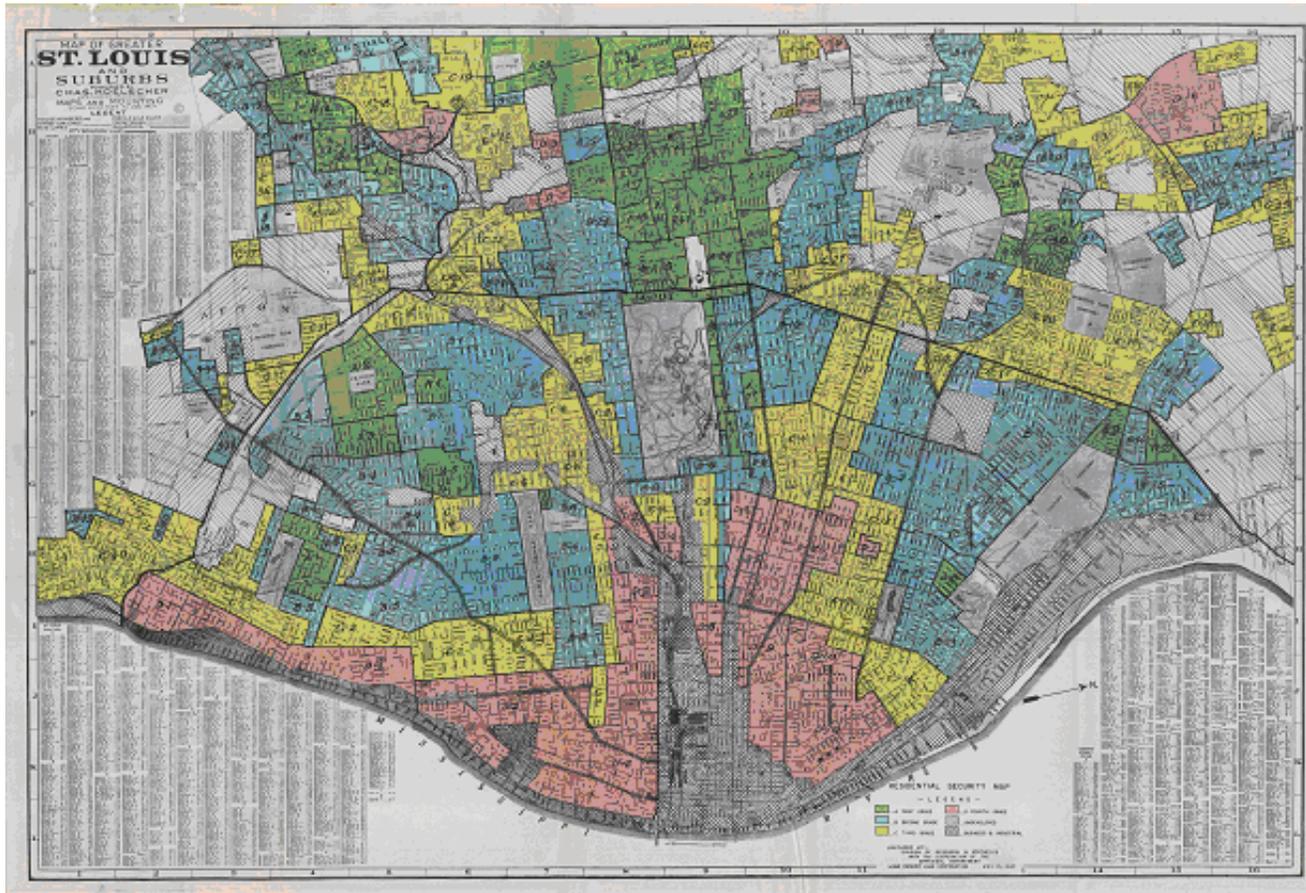
In addition to local restrictions and practices of the real estate industry and neighborhood associations, federal housing policies contributed to the segregation of African-Americans. The combination of federal loans subsidizing the movement of white families to suburban developments and concentrating public and other assisted housing in the urban core hardened the lines of segregation in the St. Louis region.



43 *Jones v. Alfred H. Mayer Co.*, 392 US 409-1968.

44 2011 Fair Housing Trends report, National Fair Housing Alliance, April 29, 2011. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202011.pdf>.

Map 4:



Source: *St. Louis Security Map, 1937*, Source: <http://www.urbanoasis.org/projects/holc-fha/digital-holc-maps/>

HOLC and FHA loans

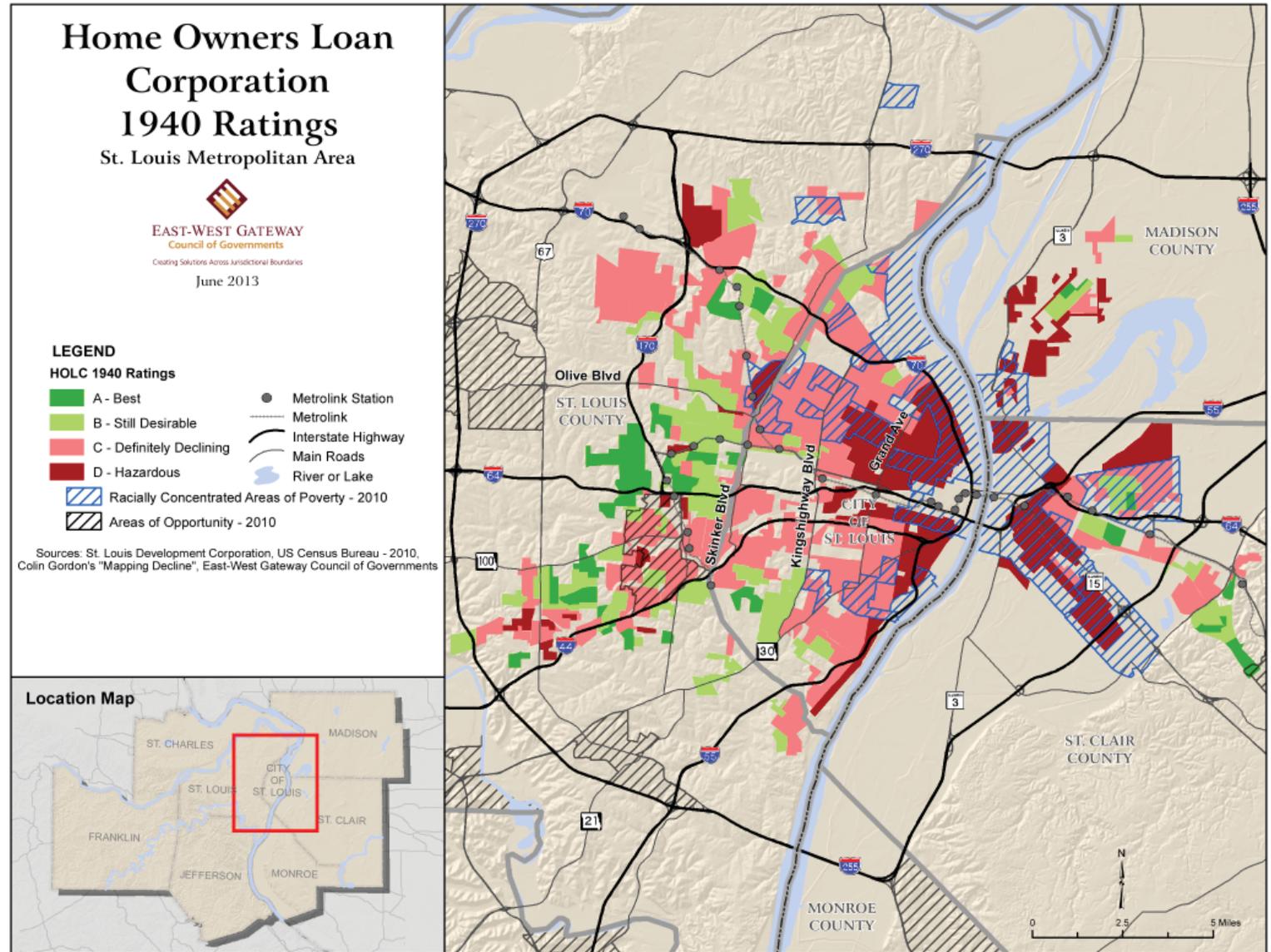
Beginning in the 1930s, the Home Owners Loan Corporation (HOLC) provided federally-sponsored home mortgages for homeowners. Their policies followed racially restrictive guidelines that evaluated risk of mortgage security along the characteristic of a neighborhood. The map on the previous page was used by the Home Owners Loan Corporation for St. Louis in 1937 (Map 4). This map shows the color codes that correlate to security ratings risk, with red areas deemed “hazardous.”

These red areas, which correlate to African-American communities, essentially were restricted from HOLC loans, but also had the effect of restricting credit by private institutions as the HOLC guidelines were used widely in public and private practices.

The Federal Housing Administration through the 1940s and 1950s used the HOLC guidelines as part of their underwriting criteria for FHA and VA mortgages.⁴⁵

The criteria used by the FHA required an appraisal of a home's value, including the characteristic of the surrounding neighborhood. Considering the continued perception that black neighborhoods were at higher risk and less value than white neighborhoods, the FHA's appraisal process restricted availability of loans for areas with minority population, particularly St. Louis city. Map 5 depicts the 1940 HOLC ratings for St. Louis city and county along with the racially concentrated areas of poverty and areas of opportunity. The RCAPs are predominantly located in areas that were identified as "definitely declining" or "hazardous", while most of the areas of opportunity are located in areas that were not rated. The overlap between the RCAPs and the C and D HOLC ratings indicates how the HOLC rating system may have contributed to the segregation of minorities. The opportunity for home ownership provided through the FHA and VA loans helped spur suburban developments throughout the 1950s and 1960s. As such, white families had opportunity

Map 5:



and motive to move farther west into suburban St. Louis County, due in part to the prejudice against African-Americans fueled by real estate agents.⁴⁶

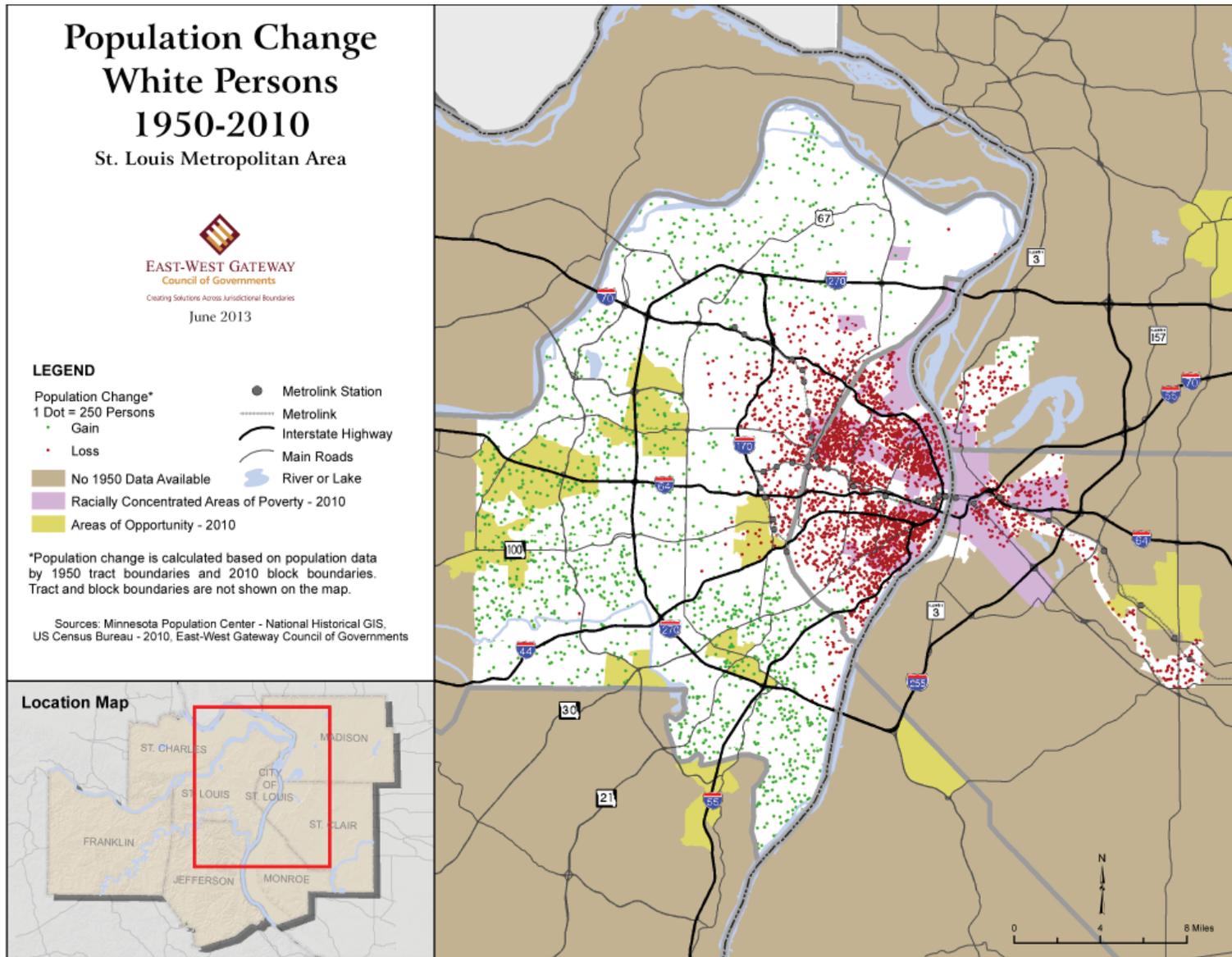
This movement by whites is commonly termed "white flight." Between 1950 and 1970, nearly 60 percent of the white population fled St. Louis city, further

solidifying the segregated living patterns.⁴⁷

46 Ibid. Page 96.

47 "Mapping Decline" website. <http://mappingdecline.lib.uiowa.edu/map/>.

Map 6:



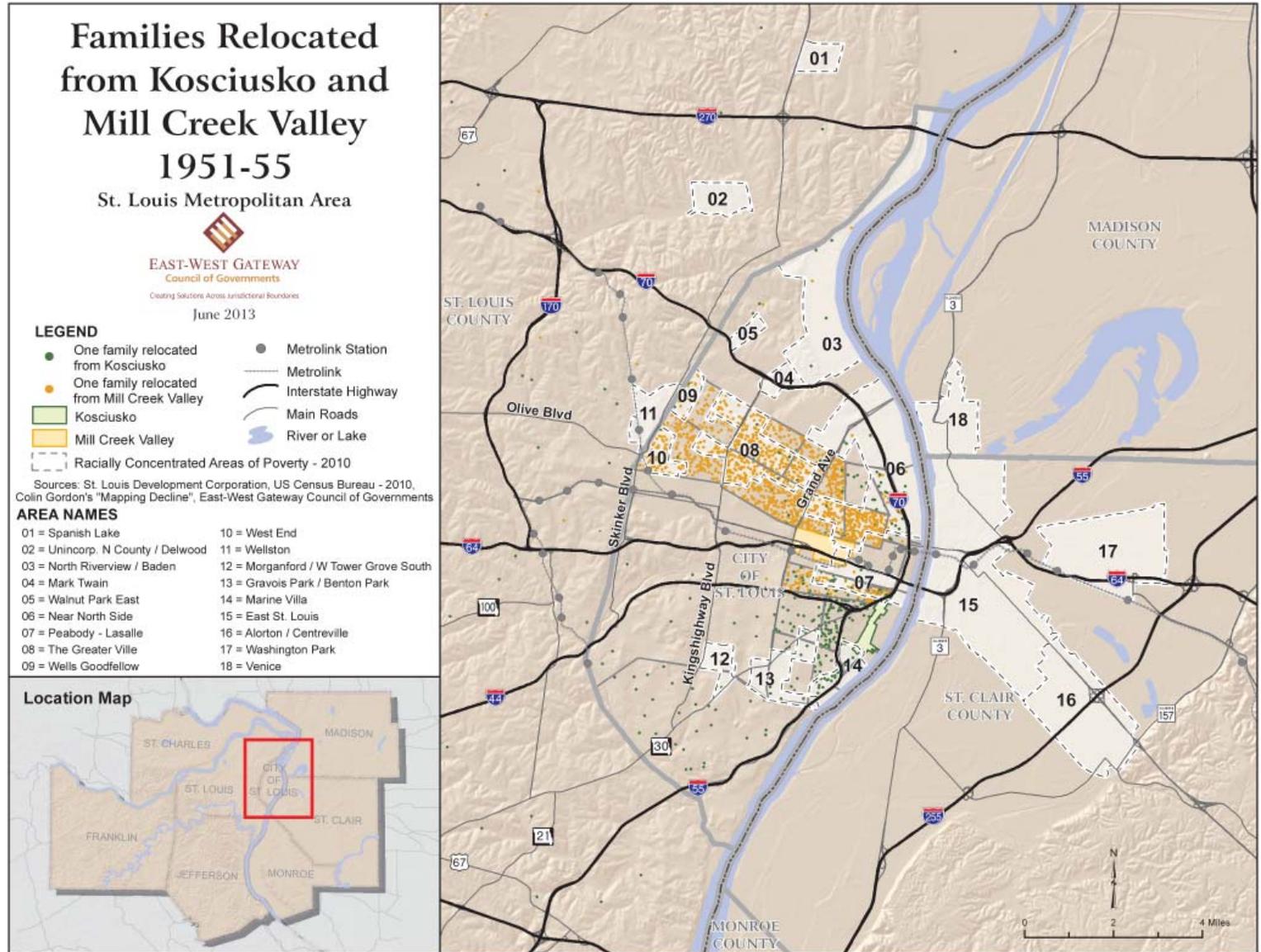
Map 6 depicts the change in white population from 1950 to 2010 along with the locations of the RCAPs and areas of opportunity. As shown on the map, all of the RCAPs show substantial decreases in white population over the time period while most of the areas of opportunity show substantial increases in white population. This map concentrates mostly on the central part of the region because data from 1950 is not available for the outlying areas.

The Lake St. Louis/Dardenne Prairie/O'Fallon area of opportunity in St. Charles County is one not shown on this map. However, a look at the population data from St. Charles County depicts a similar pattern. In 1950 the total population of the county was 29,834. By 2010, the population increased to 360,485 of which only 10.9 percent is non-white. This further exemplifies the movement of the white population from the urban core. *"Urban Renewal" and Public Housing*

Segregated Areas, Diversity

At the same time the suburbs were booming and home loans were easily available to white families for new single-family homes to escape the diverse urban core, funds for public housing were directed toward St. Louis city and projects of “urban renewal.”⁴⁸ These policies were designed to clean up slums, like the Mill Creek Valley project in 1958. Huge tracts of lands were cleared for redevelopment, displacing thousands of black families and providing no opportunities to move back into the area. The effect of the displacement was new segregated neighborhoods as black families moved into surrounding areas of the urban renewal projects. Map 7 depicts the relocation of residents from two urban renewal projects—Mill Creek Valley and Kosciusko. The map was reproduced from Colin Gordon’s book, *Mapping Decline*, with RCAPs laid over top. The map shows that when these two areas were cleared in 1959 and 1958, respectively, residents relocated to areas that are today RCAPs. Gordon estimates that about half of residents used the relocation assistance while

Map 7:



48 Turbov, Mindy and Valerie Piper. 2005. HOPE VI and Mixed-Finance Redevelopments: A Catalyst for Neighborhood Renewal. Washington, DC: Brookings Institution, v, 8.

the other half relocated on their own. With either path, the result was that residents were left with few options and “generally settled in already blighted areas”.⁴⁹ While data is not available to make this type of connection for all RCAPs, these two examples are thought to be illustrative of how pockets of racially concentrated poverty were perpetuated.

The urban renewal projects also increased demand for public housing developments to absorb the displaced families, including large high-rise housing developments like the infamous Pruitt-Igoue in the mid-1950s. Most of the public housing was built in predominantly black areas, which further perpetuated segregation.⁵⁰ The “urban renewal” projects continued

through the 1970s with the designation of “blight,” the clearance of those areas that displaced residents, and then redevelopment efforts that failed to bring needed investment to the residents and life into the communities.⁵¹

Following the failure of high-rise public housing developments, public housing theory and funding were directed to deconcentration and mixed-income developments.⁵² Funding for public housing also changed to add both private and public sources. In 1992, HUD started the HOPE VI project.⁵³ The work of McCormack Baron Salazar in developing affordable housing that was mixed-finance and mixed-income was a model for the Hope VI HUD program.⁵⁴ The Murphy Park development in the Near North Side neighborhood of St. Louis was among the first of such projects to rehabilitate the area previously of the Vaughn high-rise public housing, and use a mixed-income and mixed finance approach.⁵⁵ Ultimately,

Murphy Park is heralded as a success in community development projects as the development incorporated numerous stakeholders and provided key services to improve the quality of the neighborhood surrounding the development, including the elementary school.⁵⁶

However, the concentration of those developments that used HOPE VI and other partnership funds are still located in areas of high minority population and high areas of poverty. The fact that federal assistance for subsidized housing was primarily directed to St. Louis city throughout the years while suburban municipalities resisted subsidized housing contributed to the segregated patterns in the region.⁵⁷

Exclusionary Zoning

Suburban communities in the St. Louis region developed through the postwar era and incorporated into municipalities. By 1960, there were 95 municipalities in St. Louis County.⁵⁸ They had authority to decide land use and zoning, which in turn affected the type of housing built and the residents that could afford that type of housing. This was done through exclusive zoning, often with the effect of excluding multifamily and affordable housing. Large lot zoning was seen as a way to maximize tax revenues, stabilize property values and minimize demands on their local government, which attracts solely single-family homes on large lots.⁵⁹ Considering the demographics of these suburban municipalities and the demographics of the region, the exclusive zoning and land use decisions were “little more than restrictive covenant[s] in disguise” and underlined by racial prejudice.⁶⁰

49 “About Hope VI” U.S. Department of Housing and Urban Development, http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/hope6/about.

50 McCormack Baron Salazar. About Us / History. <http://www.mccormackbaron.com/about/history>.

51 Turbov, Mindy and Valerie Piper.

52 Ibid, page 19.

53 Gordon, Colin, pg 100.

54 Ibid, pg. 129.

55 Ibid. Pg. 147.

56 Ibid.

57 Gordon, Colin. Page 104.

58 Ibid. page 109.

59 Ibid. Pg. 147.

60 Ibid.

Redlining

The deepened segregation patterns allowed realtors, lenders, and other housing providers to use geographic boundaries as a code for racial exclusion, a practice referred to as “redlining.” Despite the passage of the Fair Housing Act in 1968, real estate agents continued to steer potential homebuyers to areas based on their race. Federal housing assistance flowed primarily through subsidies in the private market, with a greater likelihood for discrimination. Redlining continued in the home mortgage and home insurance market as lenders used race and the racial composition of the neighborhood to make decisions about loans.⁶¹ These practices affected predominately minority areas like St. Louis city most severely.⁶² Blacks were significantly less likely to obtain a mortgage, or at least a mortgage with similar terms and conditions that a white borrower could obtain. The divestment through banks and lenders as they refused to offer mortgages or home insurance in areas

with high minority population had a long-term impact on the quality and value of the housing stock, in addition to contributing to the racial disparity of acquiring wealth and accessing credit.⁶³

Perpetuators of Segregation

The history of St. Louis that created and contributed to segregated housing policies continues to have a long-lasting impact on what exists today. The concentration of African-Americans in St. Louis city, north St. Louis County, and the Metro East results from decades of restrictive deed covenants, exclusionary lending policies, and subsidies for home ownership in the suburbs. This report examines a few factors that continue to perpetuate segregation, including disparities in location of housing, exclusionary zoning, community opposition, and acts of discrimination.

Disparity in Housing

One factor that continues to perpetuate segregation is housing. The distribution of housing across the St. Louis

region is unequal in terms of tenure of housing, type of housing, and location of affordable housing. This difference in housing across the region creates disparities in opportunities for housing choices.

The Regional Plan for Sustainable Development (RPSD) Housing Sub-Committee and residents that participated in community engagement sessions identified lack of diverse housing options as an issue of importance.⁶⁴ The Housing Sub-Committee released a housing assessment in July 2012 that compiles housing data, surveys, and interviews with community residents, housing professionals, and local government officials about housing within the St. Louis region. The RPSD Housing Assessment findings support many of the findings of this report. Within the context of this FHEA report, the lack of diverse housing options throughout the region is one factor that perpetuates segregation.

61 Gordon, Colin. Page 104.

62 Ibid. page 109.

63 “Redlined: A Fair Lending Analysis of the St. Louis Metropolitan Area” Metropolitan St. Louis Equal Housing Opportunity Council. February 2011.

64 *RPSD Housing Assessment*, East-West Gateway, July 2012. Page 24.

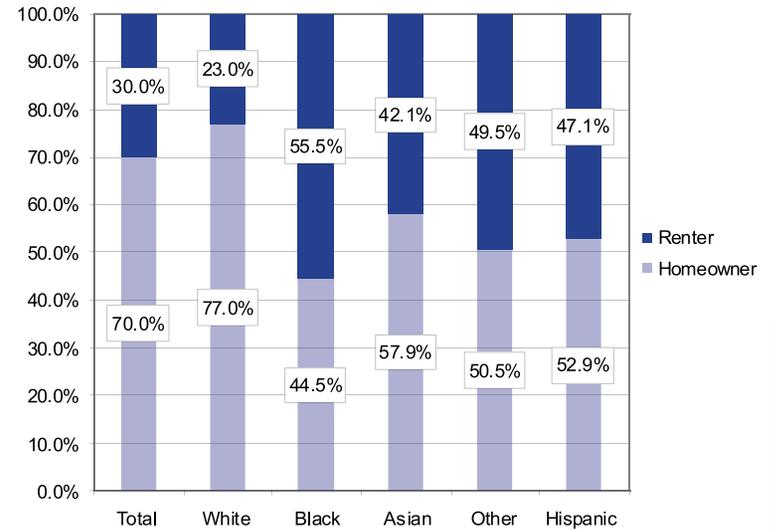
Disparity in Tenure of Housing

The St. Louis region has a home ownership rate above the national rate and above the average for MSAs in the US.⁶⁵ In 2010, approximately 70 percent of households in the St. Louis region were homeowners. However, there is a significant disparity when breaking down the home ownership rate by race and ethnicity. Graph 1 displays the housing tenure by race and ethnicity in 2010.

About 77 percent of white households own their home, compared with 44.5 percent of African-American households. The home ownership rate for African-American families is the lowest among all race and ethnicity categories. Nearly 53 percent of Hispanic households own their own home, while almost 58 percent of Asian households are homeowners.

The proportion of renters is highest among African-American households, with 55.5 percent renting according to the 2010 U.S. Census. Only 23 percent

Graph 1: Housing Tenure by Race and Ethnicity



Source: U.S. Census, 2010

of white households rent. Overall, 30 percent of occupied housing units in the St. Louis region are occupied by renters.

The disparity between renters and homeowners on the basis of race and ethnicity is perpetuated by historical trends of assets and wealth. According to the Pew Research Center, the median wealth of white households is a staggering 20 times that of black households.⁶⁶ The wealth gap between minority households and white households has widened substantially as a result of

the economic downturn. Nationally, the net worth of black households declined 53 percent from \$12,124 in 2005 to \$5,677 in 2009, while the net worth of white households decreased 16 percent from \$134,992 in 2005 to \$113,149 in 2009.⁶⁷ While the percentage decrease is striking, the value difference in wealth between African-Americans and whites is remarkable.

Additionally, the economic downturn disproportionately affected minorities and home ownership rates.⁶⁸

65 RPSD Housing Assessment, page 13.

66 RPSD Housing Assessment, Page 14

67 Joint Center for Housing Studies.

68 RPSD Housing Assessment, page 32.

The Joint Center for Housing Studies reported that black home ownership rates dropped by 4.3 percentage points from 2004 to 2011, which is nearly twice the decline of white home ownership rates.

The geographic patterns of housing tenure in St. Louis also perpetuate housing segregation (Map 8). Renter-occupied housing is heavily concentrated in the urban core. St. Louis city has the highest proportion of renter-occupied housing units at 55 percent. Monroe and Jefferson counties have the smallest proportion of renter-occupied units at 18 percent each, followed by St. Charles County with 19 percent renter-occupied housing units.⁶⁹

The concentration of renter-occupied housing in St. Louis city, East St. Louis area, and north St. Louis County correlates with areas of high minority concentrations. There are other areas with high proportions of rental housing in areas surrounding the urban core, but not a significant amount.

According to the *RPSD Housing Assessment*, local government officials have varying perspectives on rental and multifamily housing. Twenty percent indicated a need for more rental options, 34 percent indicated the need is met, and 44 percent indicated their community needs less.⁷⁰ This is concerning as the economic downturn has increased the percentage of renters, particularly among young, minority, and lower-income households.⁷¹

Disparity in Subsidized Housing

The dispersal of subsidized housing is even more limited than the weak dispersal of rental housing. In the St. Louis region, as in many regions throughout the country, the urban core received a disproportionate amount of public housing funds throughout the 1960s and 1970s. As the *RPSD Housing Assessment* describes, subsidized housing is now primarily provided through subsidies for low-income residents and funding for private development of affordable housing units.⁷²

Public Housing

There are 16 public housing authorities that operate in the St. Louis region. These agencies operate both low rent traditional public housing and the Section 8 Housing Choice Voucher programs, although smaller agencies just offer one of those programs.⁷³

The history of public housing in the St. Louis region has greatly contributed to the segregation patterns, and continues to have a long lasting effect. When federal housing policy localized public housing funds and authority, suburban municipalities chose not to apply for those public housing funds and did not set up a housing authority.⁷⁴ Thus, the flow of money for public housing developments disproportionately went to St. Louis city and the inner ring suburbs where racial transitions were already taking place.

In addition to geographic disparity, the developments and subsidies for units went to predominately African-American census tracts. Ninety-four percent of public housing units, both public housing sites and subsidized voucher sites, between 1950 and 1980 were in predominately African-American census tracts in the St. Louis region.⁷⁵ While public housing funds and models have changed dramatically since 1980, the effect of concentrating public housing in segregated areas continues today as public housing authorities are limited in scope and geographical reach.

69 Housing Authority Profiles List, U.S. Department of Housing and Urban Development, <https://pic.hud.gov/pic/haprofiles/haprofilelist.asp>.

70 Gordon, Colin, page 98.

71 Ibid page 100.

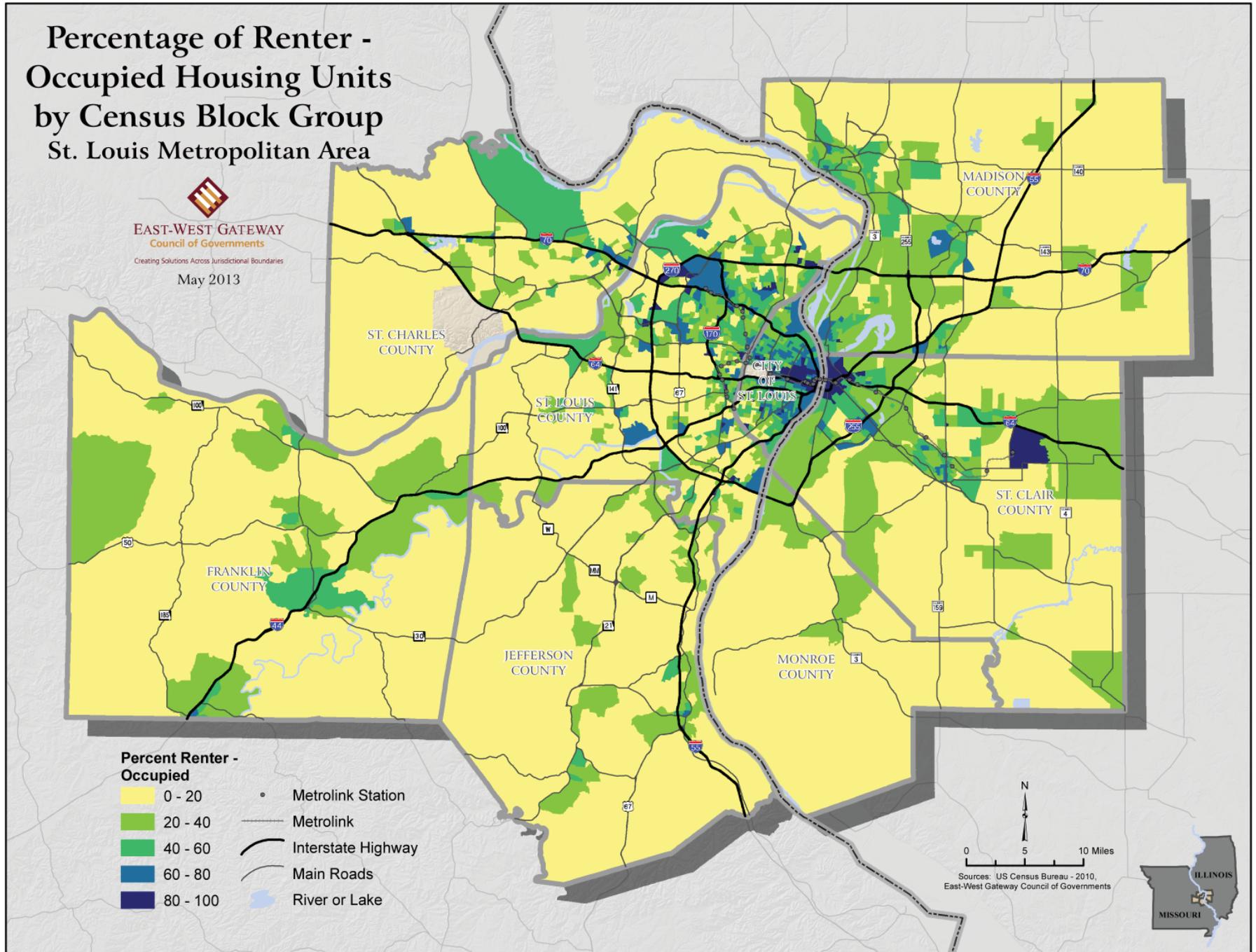
72 Housing Assessment, page 37.

73 Housing Assessment, page 38.

74 *RPSD Housing Assessment*, page 34.

75 *RPSD Housing Assessment*, page 35.

Map 8:



Segregated Areas, Diversity

The number of public housing units by county is listed in Table 9, which also shows the racial breakdown of residents. St. Louis city and St. Clair County have the highest number of public housing units. Monroe and Franklin counties do not have any public housing units. Franklin County's Public Housing Authority only offers Section 8 Housing Choice Vouchers.⁷⁶

In all counties, with the exception of Jefferson County, residents of public housing units are predominately minority. In St. Louis city, 96 percent of public housing residents are black and 1 percent are Hispanic. St. Clair County reports 90 percent of public housing residents are black.

Madison County has the highest percentage of Hispanic public housing residents at 18 percent, despite Hispanics representing only 2.7 percent of Madison County's population. In Jefferson County, only 7 percent of public housing residents are minority.

As part of the RPSD Housing Assessment, directors of public housing authorities were interviewed to better understand the challenges the agencies face when working in the St. Louis region. The most common response was the need for more decent, affordable housing. Many agencies have waiting lists that number in the thousands and/or have closed their waiting lists over the past few years.

Another major barrier for public housing authorities is the location of public housing in areas removed from opportunity. Interviews conducted through the RPSD Housing Assessment found that public housing developments are sometimes located in car-dependent areas making it challenging for residents to access services, jobs, schools and other resources. The lack of access to opportunities creates additional barriers for the residents of subsidized housing.⁷⁷

Table 9: Public Housing Units by County

	State	Total Units	Number Reported	Percent Minority	Percent Black	Percent Asian	Percent Hispanic
Madison County	IL	1,065	905	57	38	0	18
Monroe County	IL	0	NA	NA	NA	NA	NA
St. Clair County	IL	2,985	2,579	91	90	0	0
Franklin County	MO	0	NA	NA	NA	NA	NA
Jefferson County	MO	57	56	7	7	0	0
St. Charles County	MO	70	70	75	72	1	1
St. Louis County	MO	885	837	83	82	0	0
St. Louis city	MO	2,946	2,488	97	96	0	1

Source: *A Picture of Subsidized Households, 2009, HUD*

Housing Choice Vouchers

Over 17,000 units in St. Louis region reported using Section 8 certificates and vouchers, according to a 2009 report, which is the most recent available data. Table 10 demonstrates the highest concentration of vouchers is in St. Louis County, followed by the city of St. Louis and St. Clair County.

The racial composition of voucher holders by county varies dramatically. Only 3 percent of vouchers in Franklin and Jefferson counties are used by African-Americans. In St. Louis County and St. Louis city, 92 percent of voucher holders are African-American. St. Charles County reports

Table 10: Housing Choice Vouchers by County

	State	Number Reported	Percent Minority	Percent Black	Percent Hispanic
Madison County	IL	881	63	62	1
Monroe County	IL	2	NA	NA	NA
St. Clair County	IL	2,291	85	84	1
Franklin County	MO	354	3	3	0
Jefferson County	MO	666	3	3	0
St. Charles County	MO	914	35	32	2
St. Louis County	MO	7,145	93	92	1
St. Louis city	MO	4,907	95	92	3

Source: *A Picture of Subsidized Households, 2009, HUD*

76 "Missouri Senate OKs Strict Limits on Low-Income, Historic Tax Credits" St. Louis Beacon. 2/28/13 https://www.stlbeacon.org/#!/content/29648/senate_tax_credits_022813 .

77 "Mo. House panel endorses tax credit caps" St. Louis Post-Dispatch. 3/7/13. http://www.stltoday.com/news/state-and-regional/missouri/mo-house-panel-endorses-tax-credit-caps/article_62ea5605-524e-59e6-a3d0-8990de8b32d9.html .

32 percent of voucher holders are African-American. St. Louis city reports 3 percent of voucher users are Hispanic, the highest percent.

One interesting trend to note is the differences in minority percentages between public housing residents and Section 8 voucher holders. A significant discrepancy in representation of minorities could signal a difference in how housing subsidies are distributed based on race or ethnicity. Specifically, St. Charles County has a variance in minority representation between public housing and housing choice vouchers. While minorities represent 75 percent of public housing residents, only 35 percent of housing choice vouchers are distributed to minority individuals.

The overrepresentation of minorities in public housing units could indicate possible disparities for minorities accessing subsidized housing options.

The locations of these vouchers are concentrated in segregated areas (Map 9).

The geographical pattern of Housing Choice voucher use in the St. Louis region shows the lack of regional use of vouchers. Use is concentrated in already segregated areas, particularly in north St. Louis County and St. Clair County.

According to the RPSD Housing Assessment, the negative perception of Section 8 housing is one of the biggest challenges identified by housing authorities in the region. This perception limits the potential locations for affordable housing. Research indicates that voucher holders are limited to existing high crime areas, and other low opportunity areas. The St. Louis Housing Study, another study of the RPSD Housing Subcommittee, finds that “based on research, policies that ensure that

vouchers are accepted more widely throughout St. Louis County, and other areas, would not only promote the deconcentration of poverty, but also is unlikely to adversely affect healthy vibrant communities.”⁷⁸

Low-Income Housing Tax Credit

One of the major sources of affordable housing developments is now through Low-Income Housing Tax Credits (LIHTC). The tax credits are allocated through state and local agencies, including the Missouri Housing Development Commission and the Illinois Housing Development Authority. These agencies provide tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to low-income households. In addition, these state agencies allocate their own state tax credit program. According to the RPSD Housing Assessment, the Missouri Housing Development Commission allocated over \$113 million in state tax credits in 2011, with a 10-year credit. The Illinois Housing

Development Authority allocated just over \$15 million in 2011 for a one-year credit period.⁷⁹

According to the RPSD Housing Assessment, property owners use LIHTC to reduce federal income taxes. The credit is provided to the developer for 10 years, and units for low-income households must be rented for 30 years. There is some concern that the expiration of tax credits could threaten the availability of low-income units.

Another concern regarding tax credits in affordable housing are threats in the Missouri legislature to substantially lower historic preservation tax credits and low-income housing tax credits. Currently, caps on the tax credits are \$140 million for historic preservation and \$190 million in low-income housing.⁸⁰ Bills to decrease the caps of those programs have been considered in previous years. During this current legislative session, the Missouri senate passed an economic development bill, SB 120, which would cap historic preservation tax

78 Low-Income Housing Tax Credit Database, HUD, <http://www.huduser.org/portal/datasets/lihtc.html>.

79 Gordon, Colin. Mapping Decline website, <http://mappingdecline.lib.uiowa.edu/map/>.

80 St. Charles County Draft Analysis of Impediments, 1/30/13, accessed online: <http://cd.sccmo.org/CommunityDevelopment/>.

Map 9:

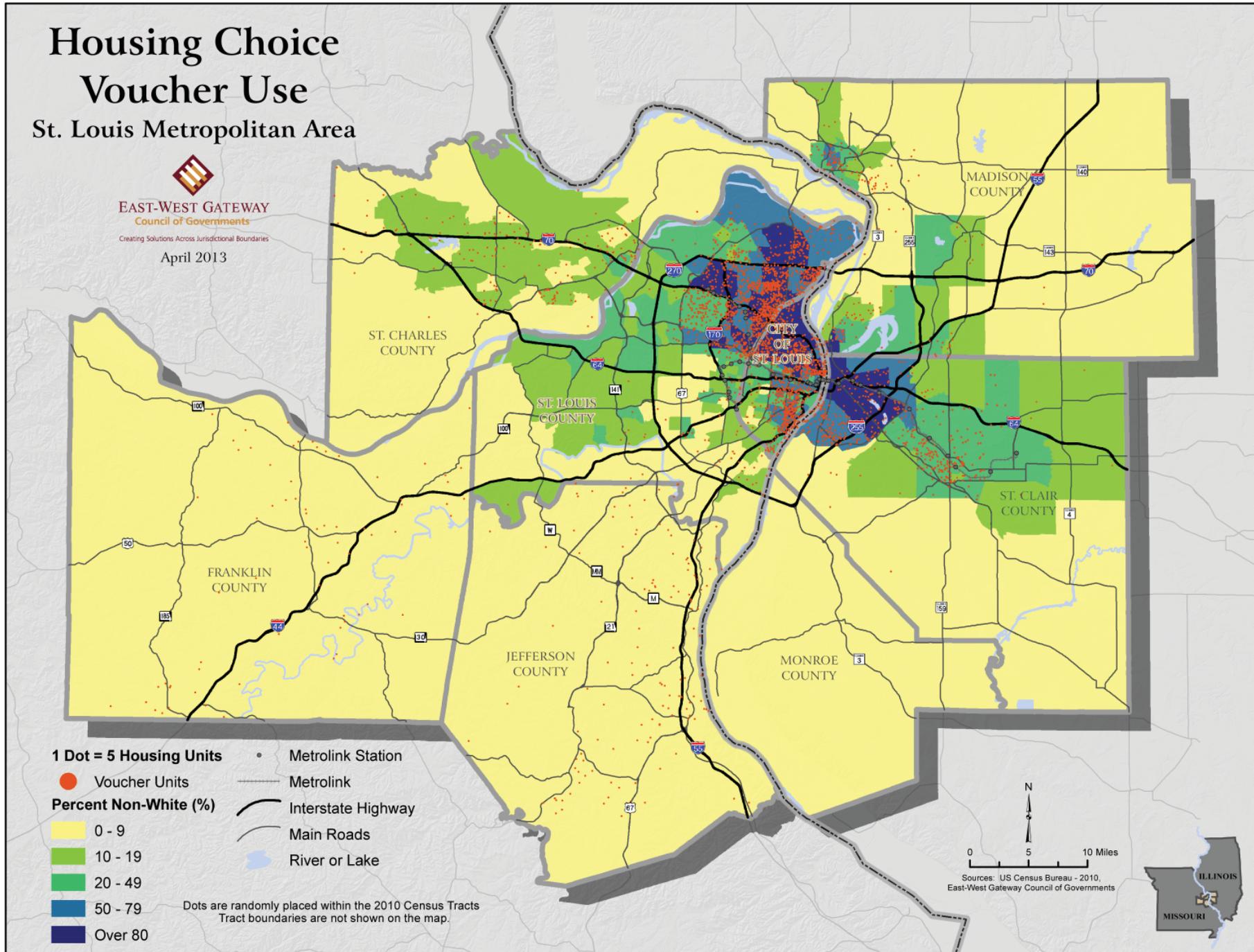
Housing Choice Voucher Use

St. Louis Metropolitan Area



EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries
April 2013

Segregated Areas, Diversity



credits at \$50 million and low-income housing tax credits at \$55 million. At the time of this report, the bill is being considered in the Missouri House.⁸¹ The decreases in availability of low-income housing tax credits would substantially limit the opportunity to develop affordable housing.

HUD maintains a database of LIHTC properties, with information on projects placed in service from 1987 to 2010.⁸² This data does not include the state tax

credit program. According to HUD, there have been 509 developments in the St. Louis region utilizing low-income housing tax credits. Table 11 shows the LIHTC properties by county. Again, these have been disproportionately located in the urban core, and disproportionately located in predominately minority areas (Map 10).

These projects have also been disproportionately located in overwhelmingly African-American neighborhoods. Of the 509 developments built between 1987 and 2010, 62 percent of those (227 developments) have been located in a census tract with 50 percent or higher African-American population, and 45 percent of developments in census tracts with 80 percent or higher African-American population.

The map of the locations of LIHTC by percent non-white population in 2010 indicates the high concentration of projects in north St. Louis city and north St. Louis County.

Other subsidized Housing

Section 236 is another subsidized housing program that was in effect from 1968 to 1973 for new construction of low-income rental housing projects. Despite the program ending in 1973, 1,300 projects in the St. Louis region remain in existence.

There are also other multifamily assisted projects provided subsidies from HUD. According to the RPSD Housing Assessment, there are 4,701 projects in the St. Louis region.

There are also Section 8 New Construction and Substantial Rehabilitation projects, which are project-based subsidies (as opposed to Section 8 Housing Choice vouchers that go to tenants). According to HUD, there are 10,327 units in the St. Louis region.

As with other subsidized housing, the majority of these other subsidized housing projects are located in St. Louis city and St. Louis County.

Disparity in Land Use and Zoning

One underlying reason for the disparity in types of housing and affordable housing throughout the region is land use and zoning issues. The RPSD Housing Assessment identifies land use and zoning as one of the key housing challenges of the region due to the fragmentation of authority of land use planning in the St. Louis region. Beyond a regional housing challenge, this fragmented land use and zoning authority is one factor that continues to perpetuate segregation.

Because the St. Louis region has such a high number of municipalities and jurisdictions that have their own authority over land use and zoning, collecting plans and ordinances for the entire region was not feasible for this study. However, recent history of zoning and land use policies helps to understand and identify challenges affecting the region today.

Table 11: LIHTC by County

	Number of Projects	Number of Units	Number of Low-Income Units
Madison County	29	1,012	922
Monroe County	4	72	72
St. Clair County	10	271	224
Franklin County	22	506	498
Jefferson County	16	1,596	1,596
St. Charles County	26	1,651	1,651
St. Louis County	150	4,656	4,388
St. Louis City	252	9,135	7,923
Total	509	18,899	17,274

Source: Low-Income Housing Tax Credit Database, HUD

81 "Mo. House panel endorses tax credit caps" St. Louis Post-Dispatch. 3/7/13. http://www.stltoday.com/news/state-and-regional/missouri/mo-house-panel-endorses-tax-credit-caps/article_62ea5605-524e-59e6-a3d0-8990de8b32d9.html .

82 "Not In My Backyard: Removing Barriers to Affordable Housing." HUD. 1991.

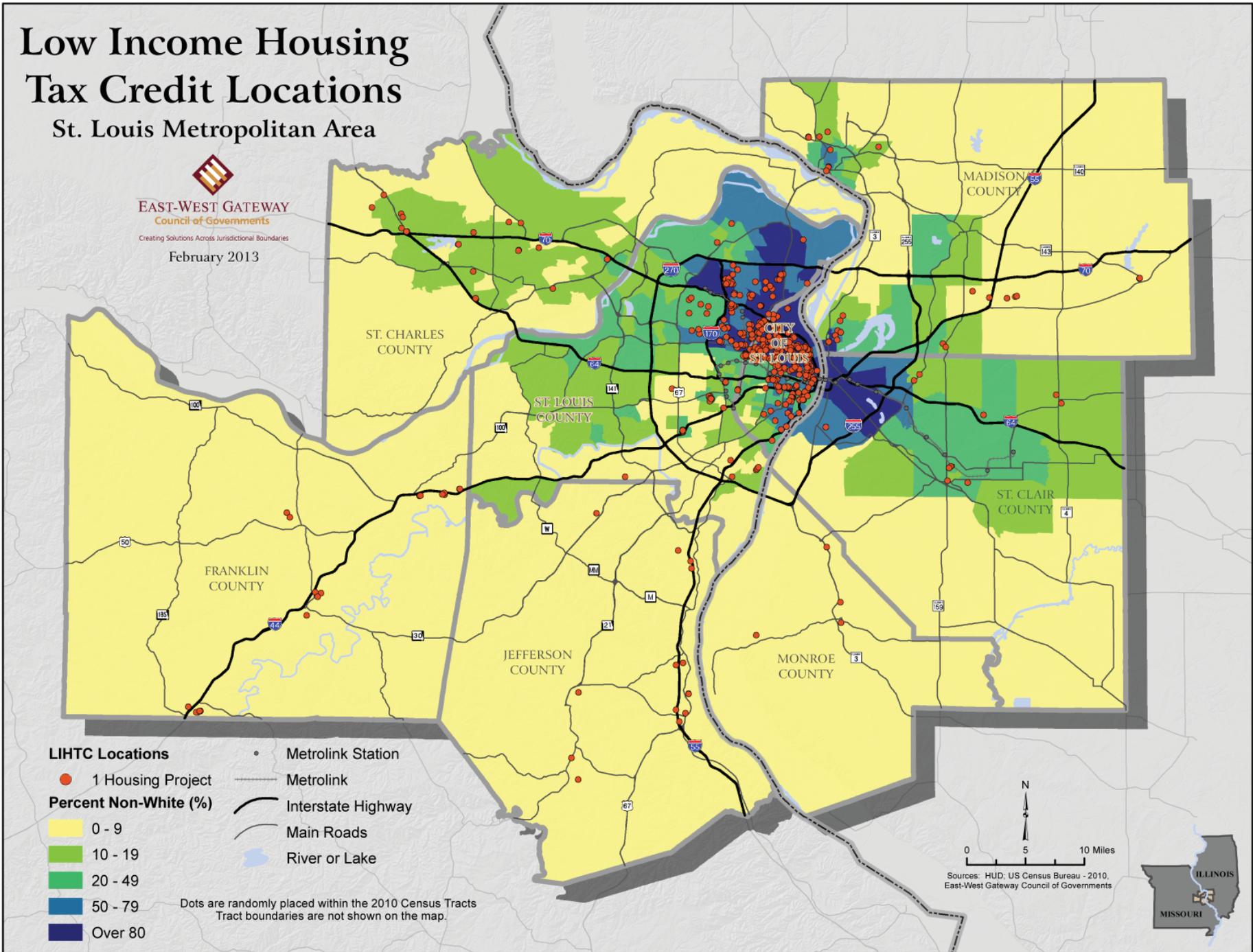
Map 10:

Low Income Housing Tax Credit Locations

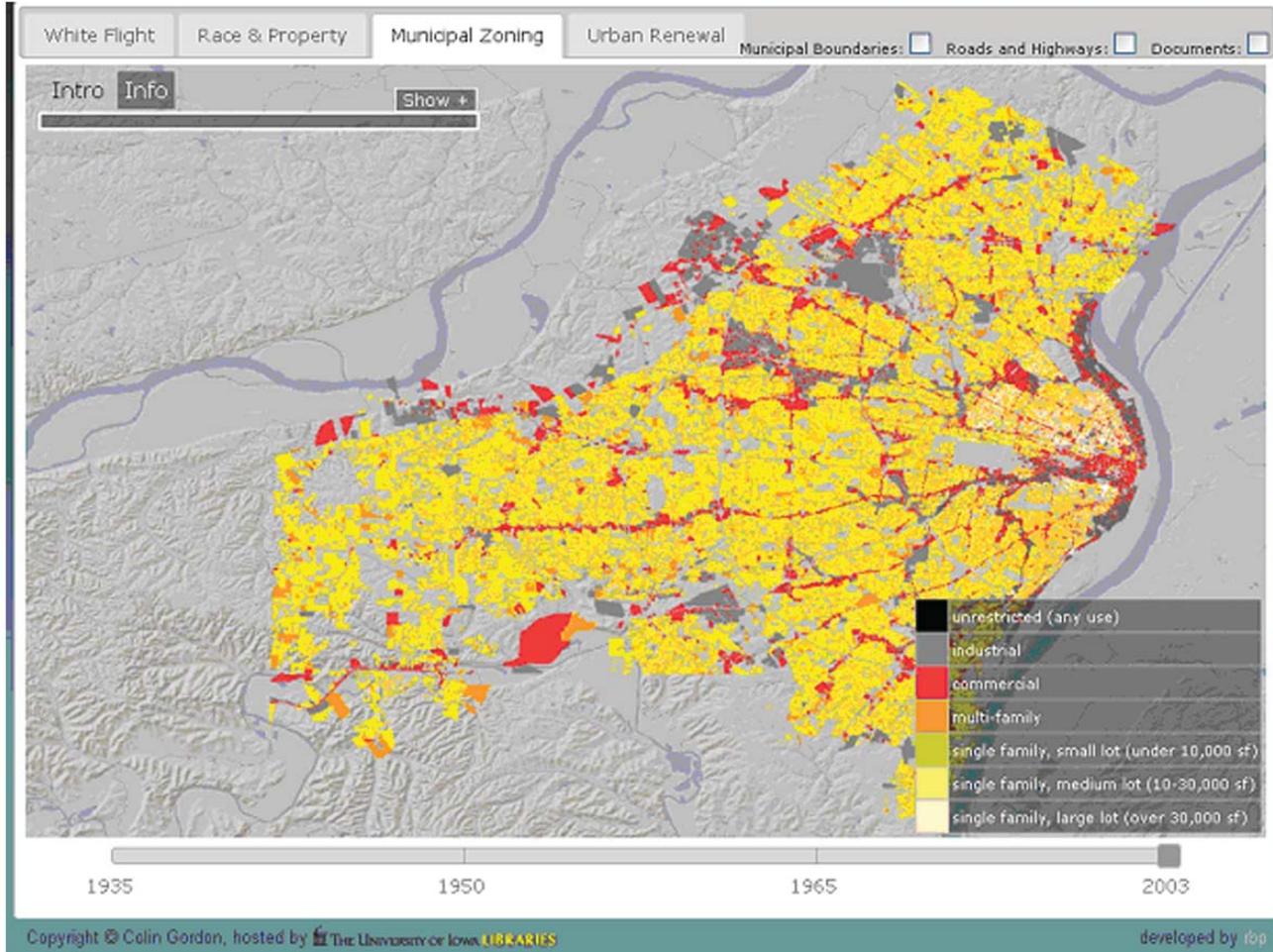
St. Louis Metropolitan Area


EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries
February 2013

Segregated Areas, Diversity



Map 11:



Source: *Mapping Decline*, Colin Gordon, University of Iowa, <http://mappingdecline.lib.uiowa.edu/map/>

Research by Colin Gordon in *Mapping Decline* is currently the most extensive research and compilation on zoning ordinances in the St. Louis region. The map (Map 11) is from the Mapping Decline website, which documents Gordon's research on municipal zoning. The map displays very little areas zoned for multifamily developments (orange), with the majority of areas zoned for single-family (yellow). While focused only on St. Louis city and St. Louis County, the trends of development priorities are clear.

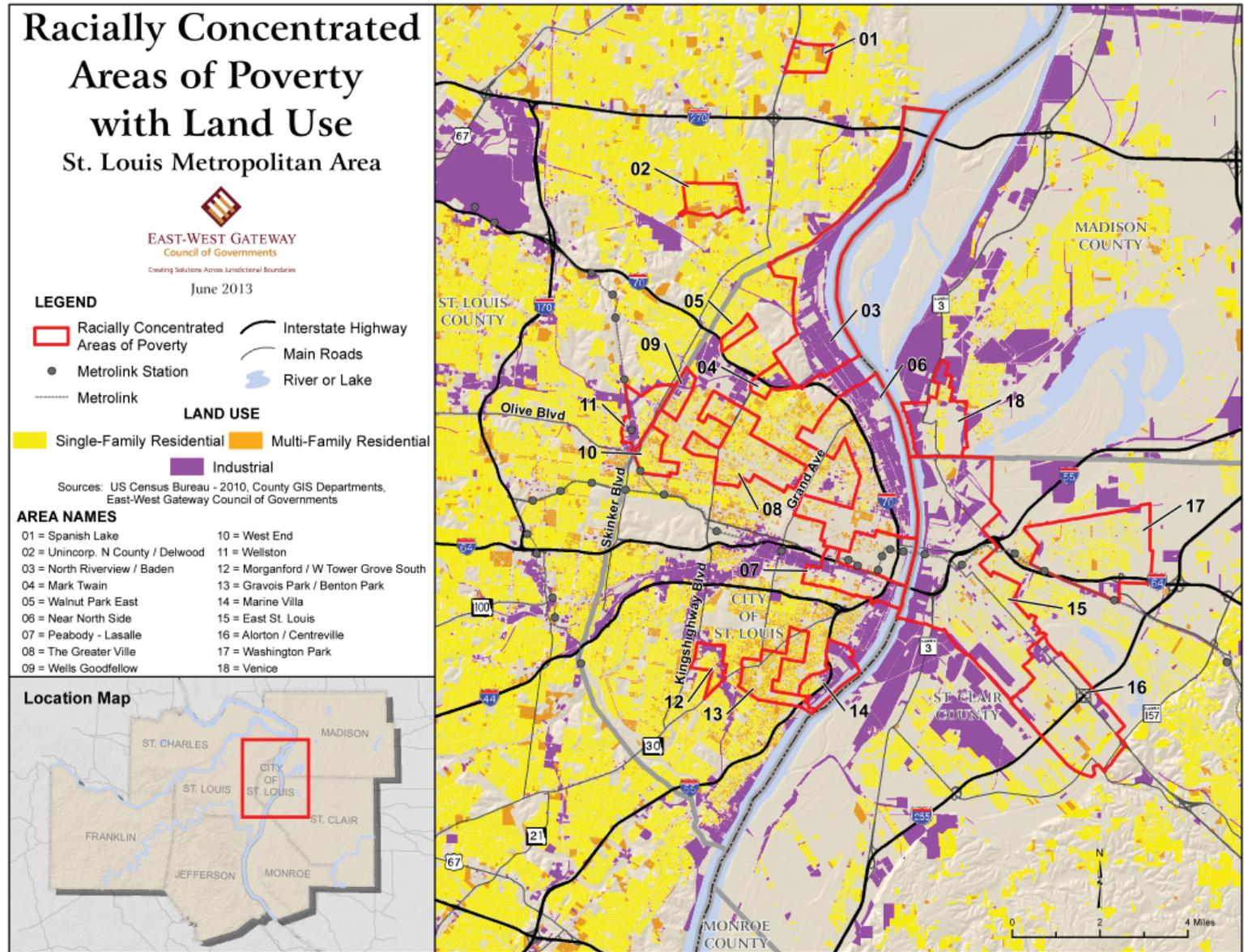
According to Gordon, communities in St. Louis County such as Creve Coeur, Ladue, and Town and Country, among others, implemented extremely restrictive regulations with the largest lot sizes and the smallest areas zoned for multifamily developments.⁸³ These suburbs remain overwhelmingly white.

83 RPSD Housing Assessment, page 37.

The areas that are continuing to grow in farther outlying areas, particularly in St. Charles County and west St. Louis County, have also emphasized building large single-family homes. In St. Charles County, a few municipalities have high minimum single-family home sizes that could present exclusive zoning concerns. According to the Analysis of Impediments for St. Charles County, some municipalities have minimum square foot requirements of 1,500, 1,600, and 2,000.⁸⁴ In addition, one municipality did not have zoning provisions for multifamily housing, although they do allow for multifamily zoning in planned residential districts. However, the analysis points to the challenges of designating an area for multifamily housing because of potential community opposition.⁸⁵

There is a disparity in land use between the RCAPs and areas of opportunity. Map 12 depicts the current land use in the region with the RCAPs outlined in red. While this is only one piece of the history, the map shows how

Map 12:



84 Public Comment Letter to city of O'Fallon, MO from the Equal Housing Opportunity Council, 2008. http://www.ehocstl.org/acrobatdocs/City_of_O%27Fallon.pdf.

85 Analysis of Impediments to Fair Housing Choice, St. Charles County, Missouri, February 2013.

Table 12: Land Use for Racially Concentrated Areas of Poverty

Racially Concentration Area of Poverty	Total Acres	Total Residential Acres	Percent of Residential - Multifamily	Percent of Residential - Single Family	Percent of Total Acres - Industrial
Alorton / Centreville (16)	2682.22	454.99	15.91	84.09	6.52
East St. Louis (15)	6210.53	458.98	19.56	80.44	19.77
Gravois Park / Benton Park (13)	838.66	375.48	53.27	46.73	0.30
Marine Villa (14)	628.63	58.00	43.96	56.04	34.64
Mark Twain (4)	283.76	72.98	20.52	79.48	24.29
Morganford / West Tower Grove South (12)	332.78	101.26	26.99	73.01	27.22
Near North Side (6)	3915.95	416.72	65.16	34.84	21.47
North Riverview / Baden (3)	3897.80	216.23	16.36	83.64	35.63
Peabody - Lasalle (7)	875.25	78.57	48.99	51.01	22.07
Spanish Lake (1)	373.88	225.38	32.69	67.31	3.00
The Greater Ville (8)	1718.23	607.70	41.71	58.29	1.30
Unincorporated N County / Delwood (2)	548.80	357.58	26.38	73.62	1.69
Venice (18)	1164.89	131.54	17.39	82.61	24.22
Walnut Park East (5)	161.86	62.62	15.34	84.66	0.00
Washington Park (17)	2651.38	523.31	9.38	90.62	3.42
Wells Goodfellow (9)	263.72	55.32	54.22	45.78	24.11
Wellston (11)	579.85	107.40	21.92	78.08	23.59
West End (10)	411.08	190.77	39.98	60.02	0.77
Average for RCAPs	1529.96	249.71	31.65	68.35	15.22

Source: US Census Bureau - 2010, County GIS Departments, East-West Gateway Council of Governments

the zoning established by communities had the effect of excluding lower income families from moving in by zoning very small portions, if any, for multi-family housing. Map 12 shows a higher concentration of multi-family residential units in the RCAPs than is seen in other areas of the region. Additionally, these areas include, and are in

closer proximity to, industrial land use.

Map 13 depicts the current land use in and around the areas of opportunity. This can be looked at in contrast with the RCAP with land use map. Years of restrictive zoning policies resulted in very little multi-family housing in these areas; limiting housing

opportunities only to those who can afford single-family homes, and often large lots.

Tables 12 and 13 provide the same data in table format. The data provides a stark comparison of the land use for the RCAPs and areas of opportunity. On average, sixty-eight percent of the residential land use in the RCAPs are single-family, compared to an average of 91 percent for the areas of opportunity. This leaves about one-third the amount of multi-family available in the areas of opportunity than is available in the RCAPs. Further, it can be seen that the RCAPs encompass a larger proportion of industrial land use, compared to the areas of opportunity, with an average of 15 percent of the total land area in the RCAPs used for industrial purposes and only four percent in the areas of opportunity.

These policies, both historical and current, that restrict the type of housing in a community to exclude multifamily developments

or lower-value homes deny the availability of housing for minorities. Whether the policy is designed to be exclusive or not, the implications of creating an exclusive community is a civil rights and fair housing concern with the consequence of a region that remains segregated.

Not-In-My-Backyard

The segregated living patterns in St. Louis are in part fueled by the opposition of residents and public officials to diverse and integrated communities. This opposition, commonly called “Not-In-My-Backyard” (NIMBY), is based on concerns that specific types of housing, changes in the community, or developments will affect property values, service levels, community ambience, the environment, and public health and safety.⁸⁶ Often, NIMBY-ism sentiment reflects racial or ethnic prejudice. Evidence of NIMBY-ism can be seen by residents, local government officials, and public officials opposing

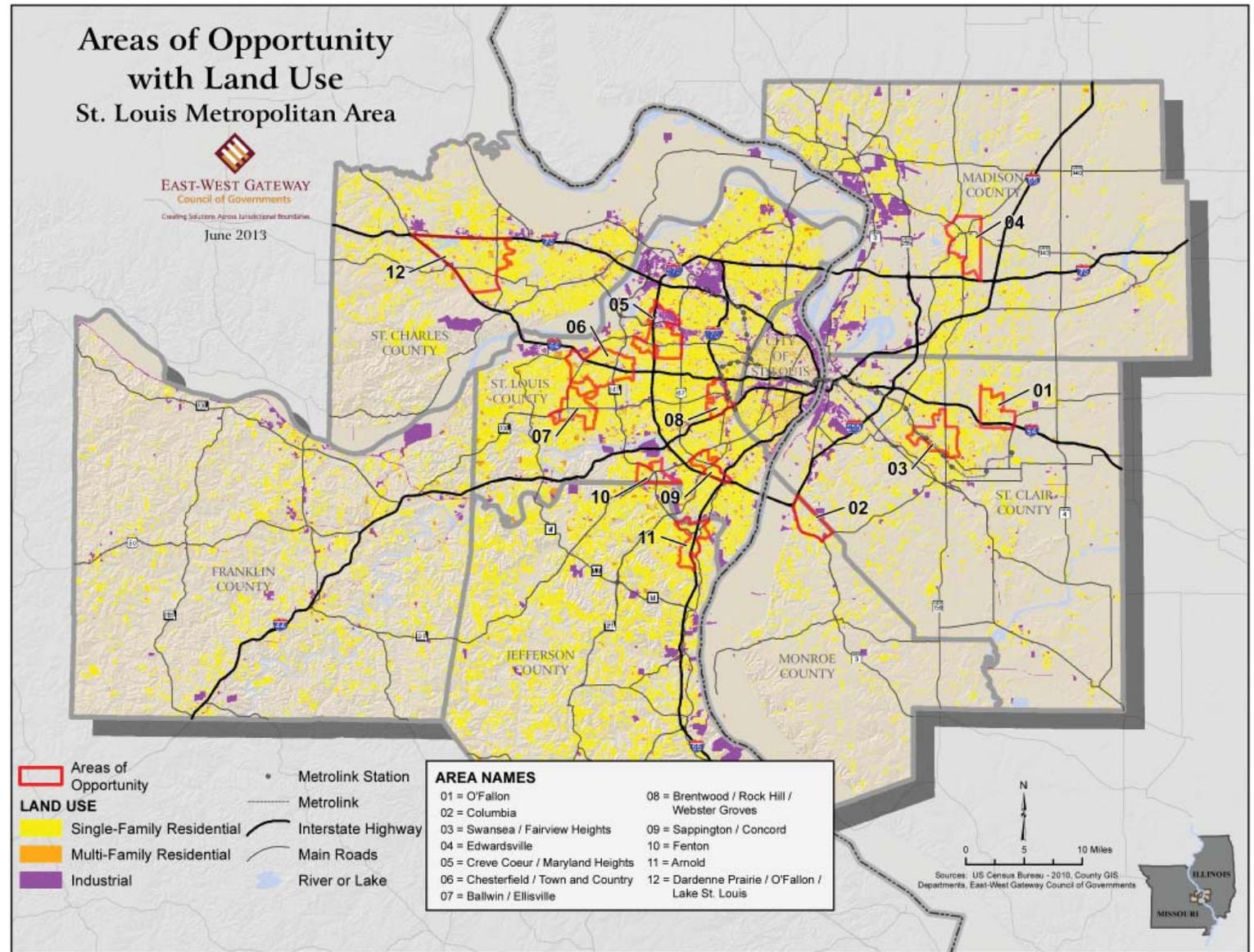
86 Analysis of Impediments to Fair Housing Choice, city of St. Louis, March 2012. Draft.

and putting barriers on the developments of affordable housing developments, public housing, and public transportation.

According to the RPSD Housing Assessment, the negative perception of public housing is a major barrier to providing more low-income housing in an integrated way across the region. Housing authority officials cited instances of residents, municipalities, and politicians fighting the development of public housing in their communities because of the negative perception carried with the developments.⁸⁷

One example is when a suburban city in Missouri rejected the development of an affordable, accessible rental housing project in 2007. The project was a mixed-income development proposed to the Missouri Housing Development Commission for Low-Income Housing Tax Credits and would have provided 56 units, 10 of which were market rate. The mayor was cited in the St. Louis Post-Dispatch saying, "Since when has O'Fallon become a dumping

Map 13:



87 Analysis of Impediments to Fair Housing Choice in St. Louis County, Unincorporated areas of St. Louis County, Florissant, St. Charles County, O'Fallon, St. Peters. April 2009.

ground for these projects that no other city wants?" At the same time of opposition to this mixed-income family development, the city supported an elderly LIHTC project. It appeared that the city was rejecting the low-income family development because of opposition to low-income families, and more specifically, minority families.⁸⁸

The challenge of opposition to multifamily and affordable housing has been identified in multiple areas of the St. Louis region as an impediment to affordable housing and fair housing. A review of Analysis of Impediments to Fair Housing (AI) shows that community opposition or NIMBY-ism was identified as a barrier to fair housing in at least three entitlement jurisdictions, including the

Table 13: Land Use for Areas of Opportunity

Areas of Opportunity	Total Acres	Total Residential Acres	Percent of Residential - Multifamily	Percent of Residential - Single Family	Percent of Total Acres - Industrial
Arnold (11)	3925.55	1842.02	8.15	91.85	5.22
Ballwin / Ellisville (7)	4667.27	2645.82	5.12	94.88	2.71
Brentwood / Rock Hill / Webster Groves (8)	2964.65	1395.64	10.30	89.70	11.25
Chesterfield / Town and Country (6)	8636.20	4381.87	14.40	85.60	0.99
Columbia (2)	3817.64	1044.71	1.87	98.13	2.65
Creve Coeur / Maryland Heights (5)	7089.97	3083.78	16.48	83.52	12.73
Dardeene Prairie / O'Fallon / Lake St. Louis (12)	14613.04	6385.61	10.40	89.60	0.24
Edwardsville (4)	7152.25	2441.30	5.82	94.18	0.66
Fenton (10)	2592.83	964.74	7.86	92.14	2.35
O'Fallon (1)	4748.33	1949.30	8.00	92.00	0.78
Sappington / Concord (9)	2333.63	1276.28	6.76	93.24	2.22
Swansea / Fairview Heights (3)	5604.37	2432.65	13.13	86.87	0.83
Average for Areas of Opportunity	5678.81	2486.98	9.02	90.98	3.55

Source: US Census Bureau - 2010, County GIS Departments, East-West Gateway Council of Governments

most recent St. Charles County AI ; the most recent draft AI⁸⁹ for St. Louis city;⁹⁰ and the 2009 AI for the St. Louis HOME Consortium.⁹¹

Discrimination

Despite the Civil Rights Act of 1866 and the federal Fair Housing Act in 1968, and the amendments in 1988, discrimination still exists in housing and housing-related transactions, both publicly and privately. Nationally, a conservative estimate is that four million instances of discrimination happen

every year yet only a small percentage of those actually get reported.⁹²

In the St. Louis region, race and national origin discrimination happens in the rental, sales, and lending industry. The Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC), as a fair housing organization, continues to investigate and enforce cases where landlords deny availability of an apartment to African-Americans when white applicants are encouraged to live in the complex, housing

providers treat Hispanic applicants differently in the application process, realtors steer potential home-seekers to neighborhoods based on their race, and lenders make credit more available to white borrowers compared to African-American or Hispanic borrowers. Chapter 6 will detail the number of fair housing complaints in the St. Louis region, discussing trends in individual reports of discrimination as well as identifying widespread systemic issues that have the effect of perpetuating segregation.

88 2011 Fair Housing Trends report, National Fair Housing Alliance, April 29, 2011. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202011.pdf> .

89 Analysis of Impediments to Fair Housing Choice, St. Charles County, Missouri, February 2013.

90 Analysis of Impediments to Fair Housing Choice, city of St. Louis, March 2012. Draft.

91 Analysis of Impediments to Fair Housing Choice in St. Louis County, Unincorporated areas of St. Louis County, Florissant, St. Charles County, O'Fallon, St. Peters. April 2009.

92 2011 Fair Housing Trends report, National Fair Housing Alliance, April 29, 2011. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202011.pdf> .

Conclusion

The discussion on pages 13 to 36 describes the federal and local policies that led to the widespread segregation seen in the St. Louis region, and throughout the country. The reason why certain areas became racially concentrated areas of poverty and others became areas of opportunity is best understood by considering all of these factors together. Restrictive deed covenants, redlining and the concentration of public housing in or near the urban core effectively pushed African Americans and low-income families to specific areas of the region while federal loans subsidized the movement of white families to the suburbs and exclusionary zoning ensured that whites and those with higher incomes were the only ones who could afford to live there. The next chapter will identify and examine the racially concentrated areas of poverty in the St. Louis region.



3

Racially Concentrated Areas of Poverty



Racially Concentrated Poverty

Racially Concentrated Areas of Poverty (RCAP) are areas with high poverty rates and a non-white majority population. This section will identify and describe racially concentrated areas of poverty in the St. Louis region. Each RCAP is unique, presenting both strengths and challenges for the neighborhood. However, the consistent factor in all RCAPs is the high degree of poverty, the gaps in infrastructure and services and the disparity in accessing opportunities. The challenges of the RCAPs have implications for the whole region, considering the effect of poverty and the disparate impact on racial and ethnic minorities.

The definition of a racially or ethnically concentrated area of poverty for the purpose of this report is a census tract that consists of 50 percent or higher non-white population and has a family poverty rate of at least 40 percent or 300 percent of the area’s mean family poverty rate, whichever is lower.⁹³ According to HUD data, the St. Louis region mean family poverty rate is 10.62 percent, so 300 percent of that mean family poverty rate is 31.86 percent family poverty rate.⁹⁴

There are 42 census tracts in the St. Louis region that meet the definition of a Racially Concentrated Area of Poverty (RCAP).⁹⁵ This represents 7.4 percent of total census tracts within the region, and contains 4.4 percent of the region’s population. The population in these RCAPs is predominately African-American.

Map 14 on the next page shows the location of the RCAPs in the St. Louis region.

Many of the RCAP census tracts are grouped together in close proximity. A majority of RCAPs are located in the city of St. Louis. Two RCAPs are located in north St. Louis County. St. Clair County in Illinois has a group of RCAPs in the northwest section of the county, and there is one RCAP census tract just above the county boundary into Madison County.

Table 14: RCAP /ECAP— Race & Ethnicity Summary

	St. Louis Region	
	Count	Share
RCAP/ECAP Tracts	42	7.4%
In RCAP/ECAP Tracts:		
Total Population:	108,258	4.4%
Non-White :	97,852	16.6%
Black/African-American	91,266	21.9%
Hispanic/Latino	2,909	4.5%
Asian	1,504	2.6%
Native-American	188	3.9%
Pacific-Islander	11	1.3%

Source: HUD FHEA data

93 FHEA Data Documentation, Page 2.

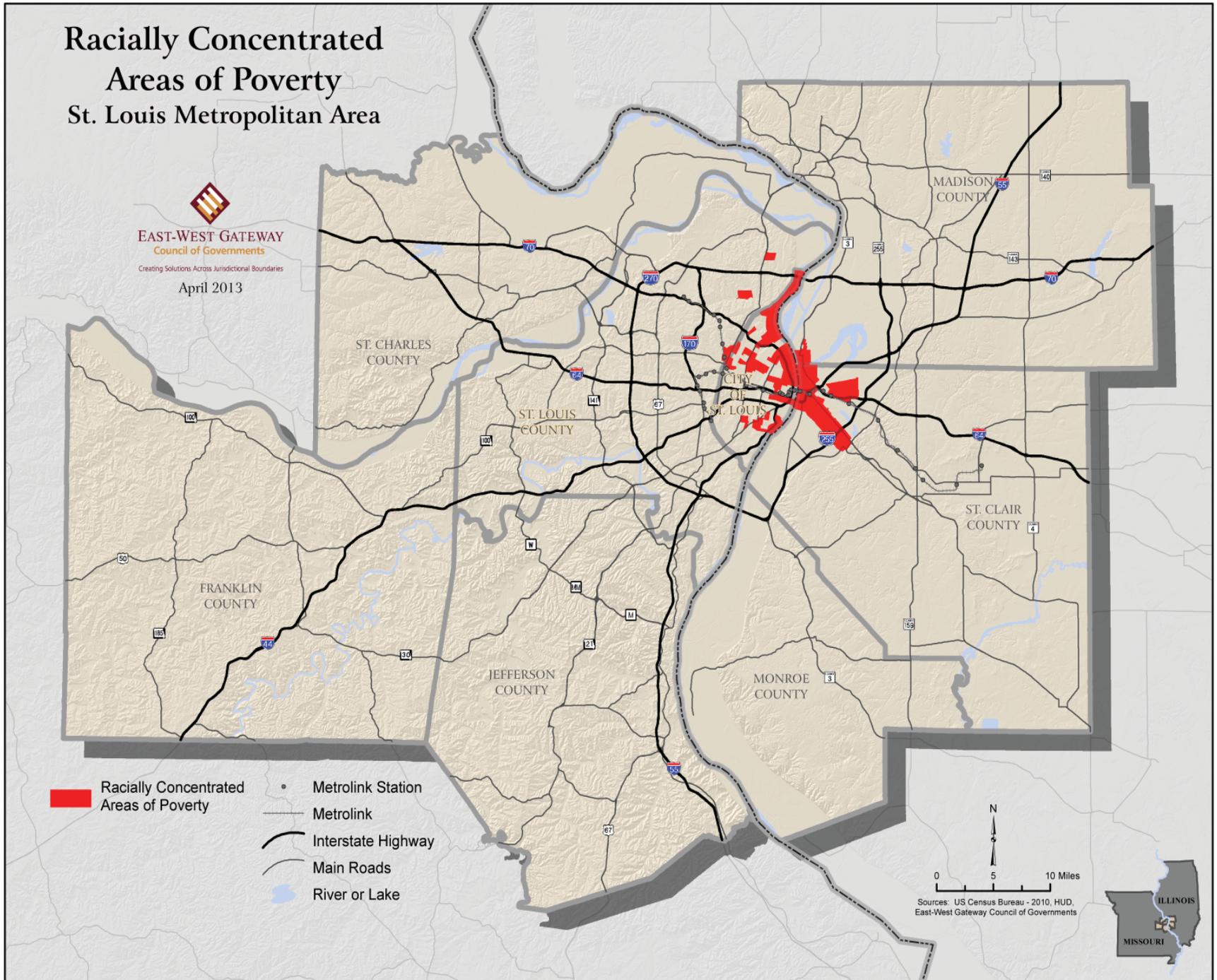
94 Data is from HUD-provided data package, FHEA_tract_base shapefile. According to the FHEA Data Dictionary, this is the core based statistical area Mean Family Poverty Rate in the St. Louis region. All data was downloaded from <http://www.huduser.org/portal/sustainability/grantees/data.html>, as of August 2012.

95 Calculated from the designations in FHEA_tract_base shapefile provided by HUD.

Map 14:

Racially Concentrated Areas of Poverty St. Louis Metropolitan Area

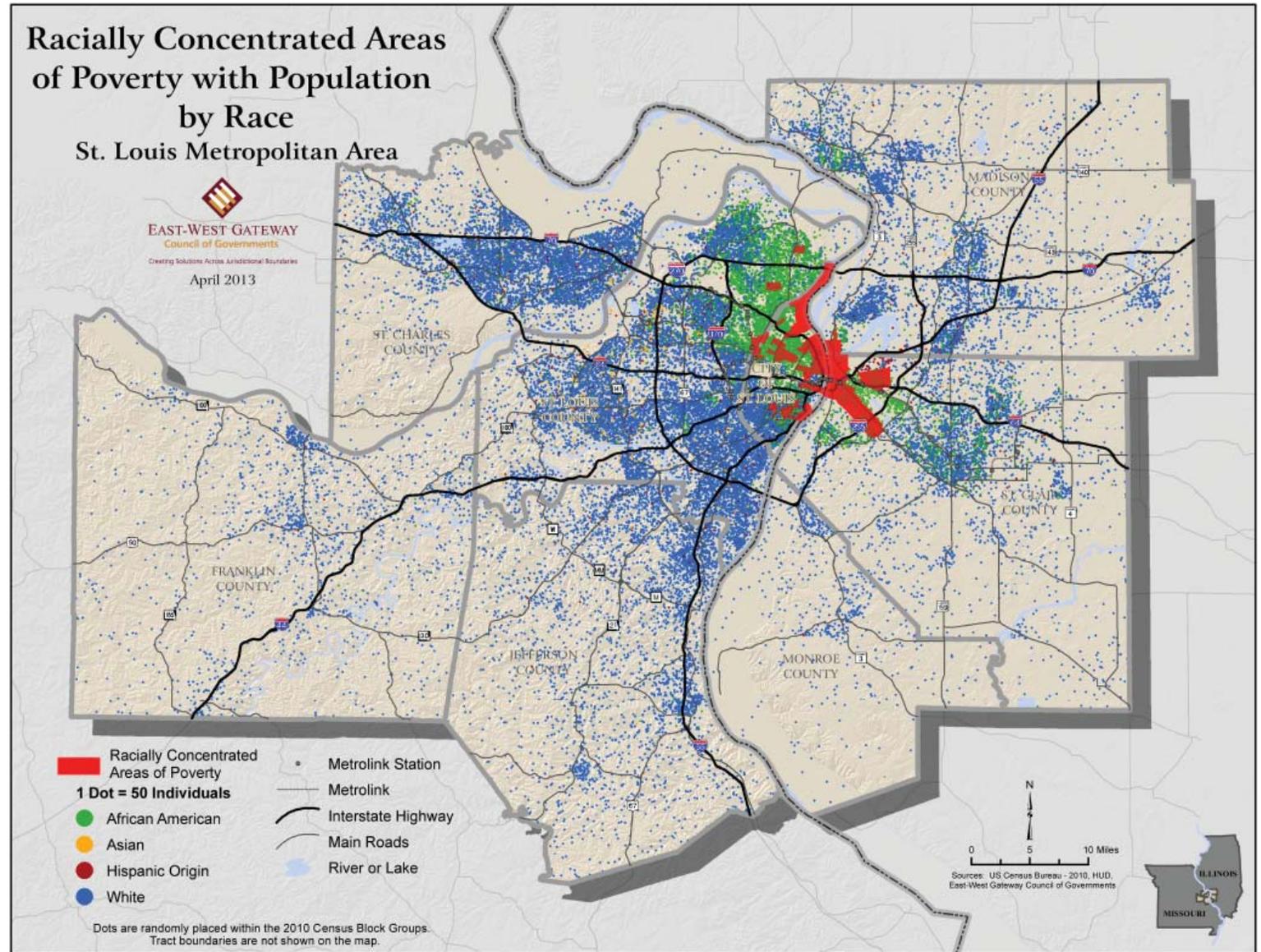

EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries
April 2013



Racially Concentrated Poverty

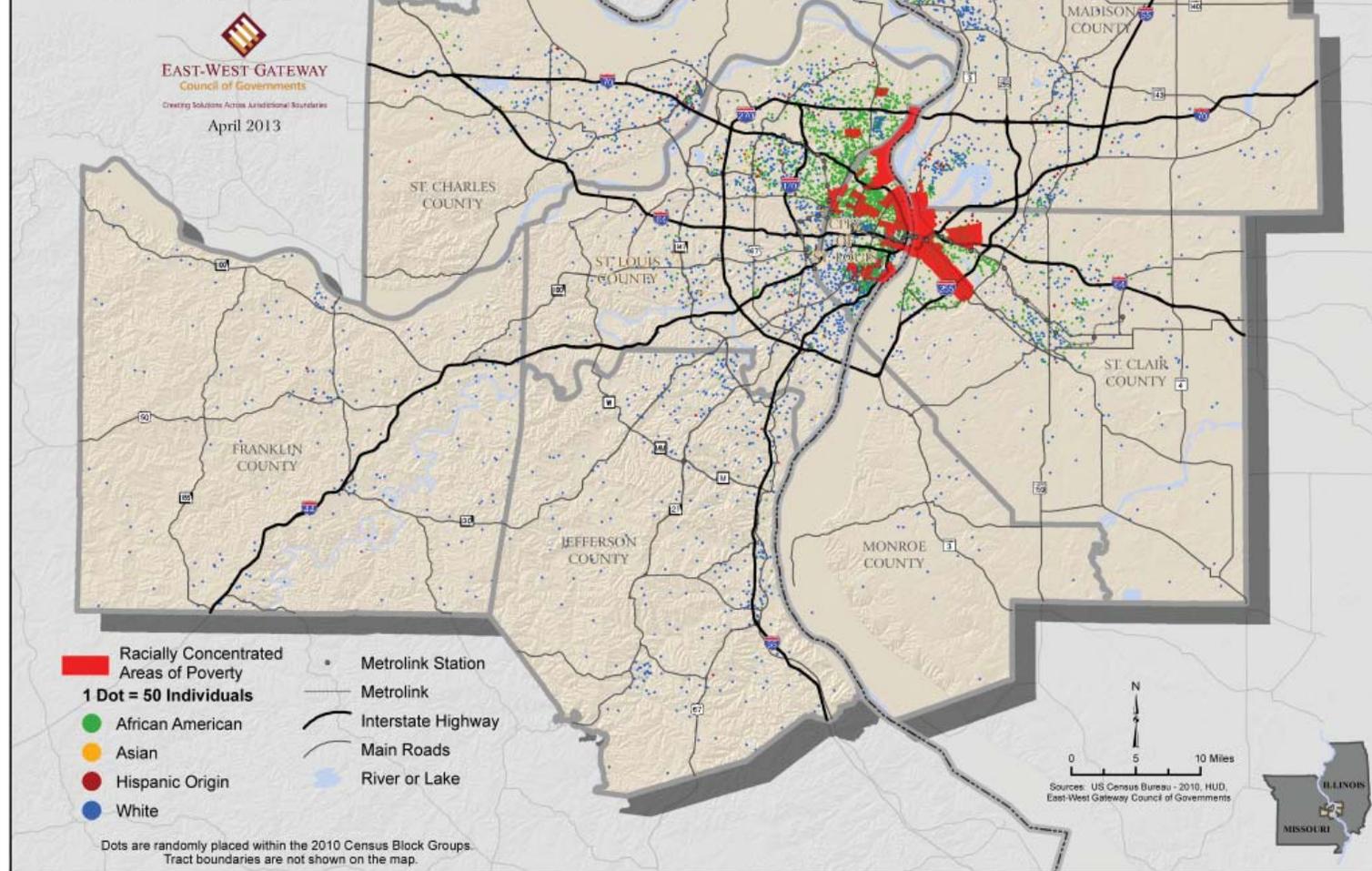
Map 15 shows the population density by race in the St. Louis region along with the RCAPs, which reveals the distribution of population within and surrounding the RCAPs, as well as the racial segregation that exists around each area.

Map 15:



Map 16:

Racially Concentrated Areas of Poverty with Population Under Poverty Line by Race St. Louis Metropolitan Area



The concentration of poverty is shown in Map 16, displaying the population under the poverty line by race.

Recognizing that other areas in the St. Louis region have similar characteristics and needs as the RCAP areas, this map shows the location of individuals under the poverty line both in the RCAP areas as well as in surrounding areas. The challenges identified in the RCAPs are likely applicable to other areas with high rates of poverty, and therefore the recommendations for improving quality of life and bringing investment can also be applied in these areas.

Many of these communities have strong organizations and residents that are dedicated to their neighborhood. These positive characteristics and the efforts that have been working in these communities to bring investment and healthy revitalization are also documented in this section because they are important assets that can be built on to address challenges.

Racially Concentrated Poverty

To allow for broader discussion and understanding of the areas being discussed, RCAPs are grouped in areas that are connected and have distinguishable neighborhood characteristics. There are 18 RCAP areas identified in this report. Census tract designations do not exactly coincide with municipality boundaries, neighborhood designations, or wards, therefore the RCAP areas are named and described by a general description of the areas they contain.

The following is a summary description of the RCAP areas. Full descriptions of each area can be found on pages 46-63.

Gaps in Infrastructure, Services and Housing for RCAPs

In general, most RCAPs have a shortage of banking services and supermarkets. The only exceptions to both are the three RCAPs in south St. Louis city, namely RCAP 12 (Morganford/Tower Grove South), RCAP 13 (Benton Park West/Gravois Park), and RCAP 14 (Marine Villa and South Riverfront).

Compared to the St. Louis MSA and the Areas Of Opportunity (discussed in Chapter 4), RCAPs have few bank branches relative to the areas' population. Table 15 shows the person-to-bank ratio in RCAPs, the St. Louis MSA and Areas Of Opportunity. This ratio is almost 3 times higher in RCAPs compared to Areas Of Opportunity and 1.6 times higher than the St. Louis MSA.

Table 15: Person-to-Bank Ratio⁹⁶

RCAPs	4,577
St. Louis MSA	2,857
Areas of Opportunity	1,608

Source: Census 2010, HUD FHEA data, PolicyMap

1. Spanish Lake

- **Census Tract:** 2107.04
- **State/County:** MO/St. Louis County
- **City:** None
- **School District:** Hazelwood (Accredited)

2. Unincorporated North County/Dellwood

- **Census Tract:** 2119
- **State/County:** MO/St. Louis County
- **City:** None, small part of Dellwood
- **School District:** Riverview Gardens (Unaccredited)

3. North Riverview/Baden

- **Census Tracts:** 1083, 1270
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

4. Mark Twain

- **Census Tract:** 1076
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

5. Walnut Park East

- **Census Tract:** 1072
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

6. Near North Side

- **Census Tracts:** 1097, 1105, 1212, 1257, 1266, 1267, 1275
- **State/County:** MO/St. Louis County
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

⁹⁶ Person-to-bank ratio was calculated by dividing population by number of bank branches for the St. Louis MSA using the FDIC summary of deposits and for the RCAPs and Areas of Opportunity using data from PolicyMap and the HUD FHEA data.

7. Peabody/Lasalle

- **Census Tract:** 1274
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

8. The Greater Ville

- **Census Tracts:** 1064, 1066, 1067, 1112, 1113, 1114, 1123
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

9. Wells Goodfellow

- **Census Tract:** 1062
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

10. West End

- **Census Tracts:** 1053, 1054
- **State/County:** MO/ St. Louis County
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

11. Wellston

- **Census Tract:** 2139
- **State/County:** MO/St. Louis County
- **City:** Wellston
- **School District:** Normandy (Unaccredited)

12. Morganford/West Tower Grove South

- **Census Tract:** 1152
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

Compared to the St. Louis MSA, the RCAPs also show higher rates of unemployment, housing vacancy, female-headed families, and people under the age of 18 (see Table 16).

Table 16: Disparities between St. Louis MSA and RCAPs

	St. Louis MSA	RCAPs
Unemployment	8.9%	22.7%
Housing Vacancy	10.5%	23.2%
Female-Headed Families ⁹⁷	20%	64%
Under 18	17%	30%

Source: ACS 2010 (unemployment, housing vacancy, and female-headed families) and Census 2010 (under 18)

Children in many RCAPs have a disparity in access to quality education. Out of 14 RCAPs in Missouri, only the Spanish Lake area is in a fully accredited school district. The St. Louis Public Schools District has recently been granted provisional accreditation while Normandy and Riverview Garden school districts are unaccredited. Based on GreatSchools⁹⁸ ratings, most school districts in which RCAPs are located have ratings of 1 or 2 out of 10. The only exception is the Hazelwood School District, which has a rating of 3. A comparison to neighboring school districts in the area shows a wide disparity based on GreatSchools ratings. For example, Ladue and Clayton school districts in St. Louis County both boast ratings of 9 out of 10, while Granite City and Belleville Township High School districts in Metro East have scores of 4 and 6, respectively.

⁹⁷ This is the percentage of all households that are female-headed families.
⁹⁸ GreatSchools District Ratings are calculated by taking the Overall Rating for each school in the district and weighting it by the number of students enrolled at the school. Then the average of the weighted ratings is taken. GreatSchools Ratings are based on each state's main standardized tests (2011-2012).

13. Gravois Park/Benton Park West

- **Census Tracts:** 1163.02, 1164, 1157, 1242
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

14. Marine Villa/South Riverfront

- **Census Tract:** 1246
- **State/County:** MO/St. Louis city
- **City:** St. Louis
- **School District:** St. Louis city (Provisionally Accredited)

15. East St. Louis

- **Census Tracts:** 5009, 5011, 5045
- **State/County:** IL/St. Clair County
- **Cities:** East St. Louis, National City, Brooklyn,
- **School Districts:** East St. Louis School District 189, Brooklyn Unit School District 188

16. Alorton/Centreville

- **Census Tracts:** 5025, 5027, 5028
- **State/County:** IL/St. Clair
- **City:** Alorton
- **School District:** Cahokia Community School District, East St. Louis School District 189

17. Washington Park

- **Census Tracts:** 5004, 5005, 5022, 5024.01
- **State/County:** IL/St. Clair County
- **Cities:** East St. Louis, Washington Park
- **School District:** East St. Louis School District 189

18. Venice

- **Census Tract:** 4007
- **State/County:** IL/Madison County
- **City:** Venice
- **School District:** Venice Community Unit School District, Madison Community Unit School District

Detailed RCAP Descriptions**Sources for RCAP Tables (pages 46-63).**

Population sources: *U.S. Census, 2010*

Poverty sources: *Family Poverty Rate, Section 8 (HUD) Unemployment rate (U.S. Census Bureau, ACS 2006-2010), Female-Headed Families (U.S. Census 2010)*

Housing sources: *Total Housing Units, Vacancy Rate (U.S. Census 2010), LIHTC Units (LIHTC Database, HUD), Public Housing Projects (Picture of Subsidized Households, HUD)*

Amenities and Services sources: *Banks (FDIC, 2012), Supermarkets (Trade Dimensions, 2011)*

Map 17:

Racially Concentrated Areas of Poverty - 2010

St. Louis Metropolitan Area


EAST-WEST GATEWAY
 Council of Governments
 Creating Solutions Across Jurisdictional Boundaries
 April 2013

LEGEND

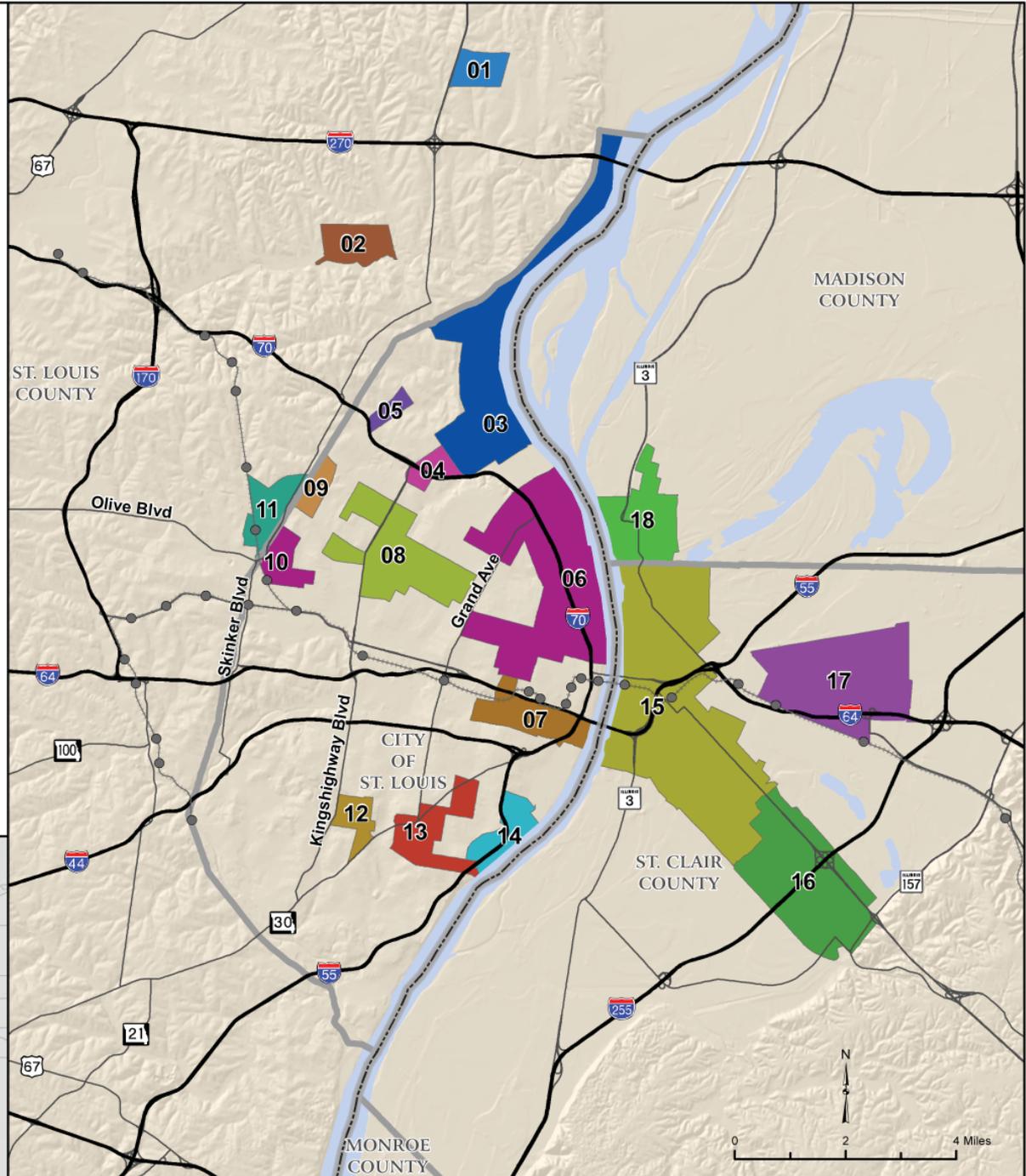
-  Racially Concentrated Areas of Poverty
-  Interstate Highway
-  Main Roads
-  Metrolink Station
-  River or Lake
-  Metrolink

Sources: US Census Bureau - 2010,
 East-West Gateway Council of Governments

AREA NAMES

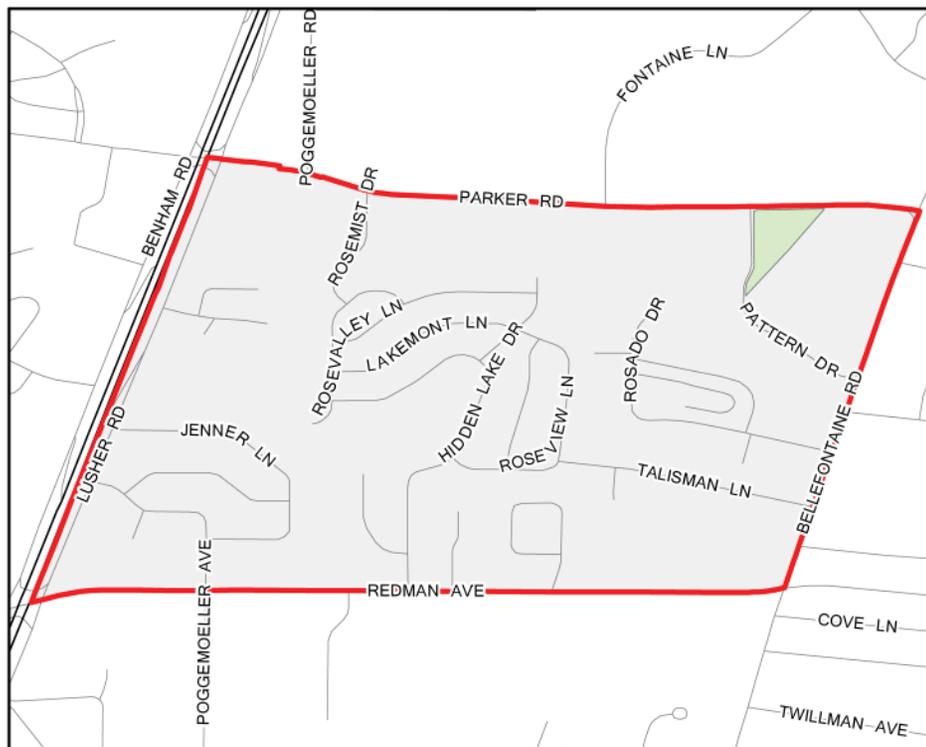
- | | |
|-----------------------------------|---------------------------------------|
| 01 = Spanish Lake | 10 = West End |
| 02 = Unincorp. N County / Delwood | 11 = Wellston |
| 03 = North Riverview / Baden | 12 = Morganford / W Tower Grove South |
| 04 = Mark Twain | 13 = Gravois Park / Benton Park |
| 05 = Walnut Park East | 14 = Marine Villa |
| 06 = Near North Side | 15 = East St. Louis |
| 07 = Peabody - Lasalle | 16 = Alorton / Centreville |
| 08 = The Greater Ville | 17 = Washington Park |
| 09 = Wells Goodfellow | 18 = Venice |

Location Map



Racially Concentrated Poverty

RCAP 1: Spanish Lake



Location

Census Tract(s): 2107.04

City: None

State/County: MO/St. Louis

School District: Hazelwood (Accredited)

The census tract boundaries are west of Lewis and Clark Blvd., south of Parker Road, north of Redman Ave., and east of Bellefontaine Rd.

Demographics

The census tracts around it are also predominately minority, but the poverty rates are significantly lower. The area has a high population density relative to the surrounding census tracts (over 6,000 per mi² compared to fewer than 4,000 per mi²). The population

of people over 65 is small compared to other RCAPs. The area also has a relatively low vacancy rate.

Description

This census tract is an unincorporated area in St. Louis County. The Spanish Lake Community Association provides services to residents in the community, which include the Spanish Lake Youth and Family Council, renovating the historic Twillman House, creating community gardens at the Twillman House, located just outside the RCAP. The St. Louis County Department of Planning is also developing the Spanish Lake Bellefontaine Road Commercial Improvement Plan. The census tract has a high school and an elementary/middle school and is in the

Population

Total Population 4,774

Population Density (pop per mi²) 8,168

Race

African-American 89%

White 7%

Asian 0.5%

Other 2.4%

Hispanic 0.7%

Age

Over 65 5.2%

Under 18 30.5%

Poverty

Family Poverty Rate 43.9%

Individuals on Section 8 2%

Unemployment Rate 15%

Female-Headed Families 43%

Housing

Total Housing Units 1,823

Vacancy Rate 10%

LIHTC Units 0

Public Housing Projects 0

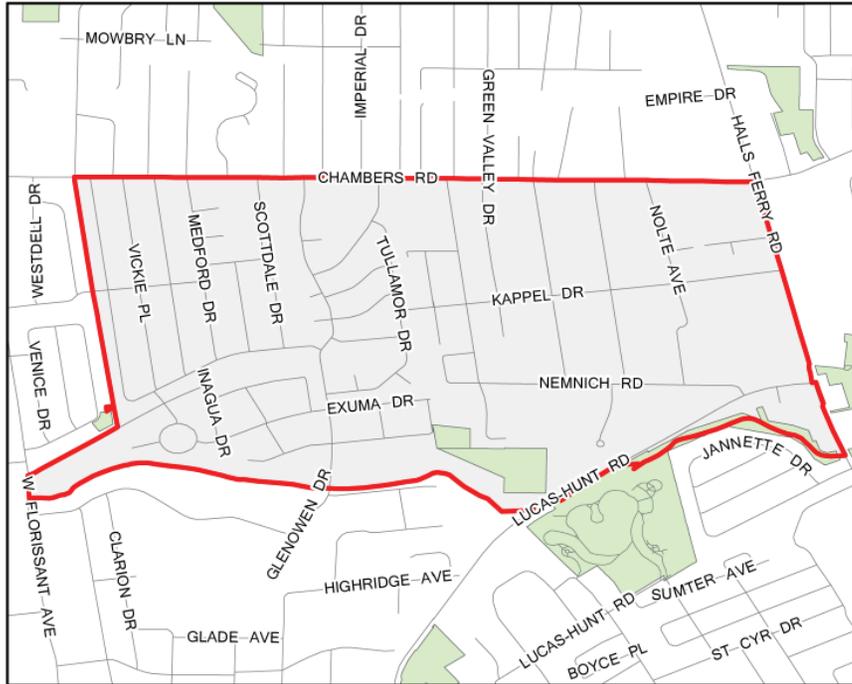
Amenities and Services

Banks

Full-service Supermarkets 1

Hazelwood School District. A Commerce Bank branch and a Shop 'n Save are also within the area.

**RCAP 2:
Unincorporated
North County/
Dellwood**



Location

Census Tract(s): 2119
City: None
State/County: MO/St. Louis
School District: Riverview Gardens (Unaccredited)

This RCAP is between Dellwood, Jennings, and Moline Acres. It is bound to the north by Chambers Road, with Halls Ferry Road to the east. The west boundary is not quite all the way to W. Florissant (follows Dellwood municipality boundary), and the southern boundary is part of Lucas and Hunt Road, and then follows Maline Creek through the residential development until Florissant Ave. The census tract is right in between three municipalities, but is unincorporated. It nearly follows the municipality boundaries.

Demographics

Areas around this census tract also have fairly high rates of poverty, and high minority population. It also has a high concentration of residents with housing assistance. Approximately 28 percent of the population is on Section 8 vouchers.

Description

There are seven schools in the census tract, three public and four private. All schools are elementary schools, except for one, which is a middle school. There are no high schools in this census tract. All public schools are in Riverview Gardens School District. Despite having many schools, there are no libraries in the census tract. The only full-service bank branch is a Regions Bank. No full-service supermarkets exist in the area, though there is a Save a Lot immediately outside the census tract. There

Population

Total Population	4,862
Population Density (pop per mi ²)	5,727

Race

African-American	91%
White	7%
Asian	0.1%
Other	0.1%
Hispanic	0.6%

Age

Over 65	8.1%
Under 18	39.5%

Poverty

Family Poverty Rate	33.6%
Individuals on Section 8	28%
Unemployment Rate	17%
Female-Headed Families	40%

Housing

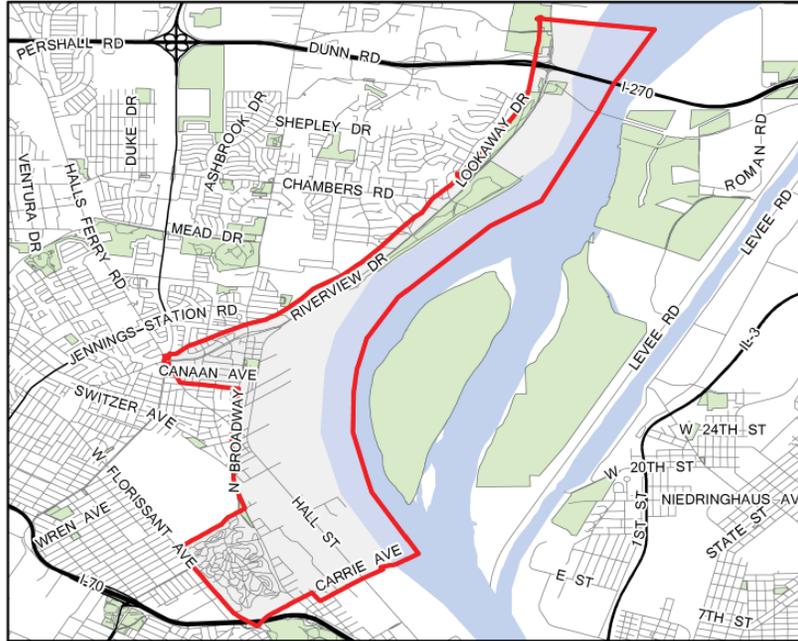
Total Housing Units	2,514
Vacancy Rate	19.1%
LIHTC Units	574
Low Income Units	558
Public Housing Projects	0

Amenities and Services

Banks	1
Full-service Supermarkets	0

are also three restaurants and a Walgreens store along the census tract boundaries.

RCAP 3: North Riverview/ Baden



Location

Census Tract(s): 1083, 1270

City: St. Louis

State/County: MO/St. Louis city

School District: St. Louis city (Provisionally Accredited)

Ward: 2

Neighborhoods: Riverview, North Riverfront, Baden

This RCAP is bounded on the north by St. Louis city limits. It includes North Riverfront Park, an area just slightly north of Riverview Drive. On the west, it is bound by Halls Ferry Road, N. Broadway, Calvary Avenue and W. Florissant. On the south, it is bound by Carrie Ave., and E. Taylor Ave. It contains Bellefontaine Cemetery. It includes the neighborhoods Riverview, North Riverfront (except the very southern portion), and the northern portion of Baden (east of Halls Ferry and north of Hornsby Ave.) It includes most of the 2nd Ward.

Demographics

The area east of Hall St. and Riverview Drive (Census Tract 1270) is more integrated than Baden (1083) census tract, with a greater share of white and Hispanic populations. Surrounding census tracts also have an African-American population of 90 percent or higher, but significantly lower poverty rates. Population density is considerably higher in Baden (1083). Census Tract 1270 also has very few residents, as it is mostly industrial, with multiple railroads.

Description

A large portion of North Riverfront consists of North Riverfront Park and Chain of Rocks Park, while Bellefontaine Cemetery takes up a sizable section of the south side. Another landmark of the area is the Chain of Rocks Bridge. Trailnet has been working on recreational activities along riverfront in this area, including the riverfront trail. St. Louis Development Corporation (SLDC) has studied the area and has plans to develop

Population

Total Population **5,514**

Population Density (pop per mi²) 907

Race

African-American 85.4%

White 9.9%

Asian 0.1%

Other 1.2%

Hispanic 3.2%

Age

Over 65 5.3%

Under 18 20.5%

Poverty

Family Poverty Rate 37%

Individuals on Section 8 2%*

Unemployment Rate 25%

Female-Headed Families 37%

Housing

Total Housing Units 7,018

Vacancy Rate 17%

LIHTC Units 0

Public Housing Projects 2

Amenities and Services

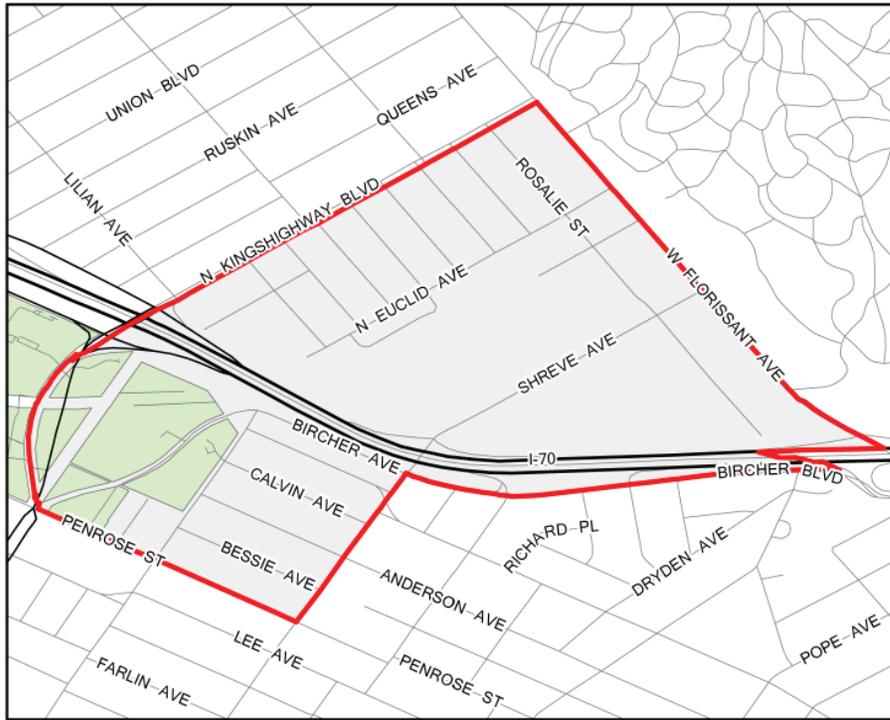
Banks 2

Full-service Supermarkets 1

** Section 8 data for this RCAP is incomplete. The actual percentage may be higher.*

the North Riverfront Commerce Corridor. There is a private PK-8 school, a library, and two public housing projects. There is also a public housing project just outside the RCAP in the Baden area. Along the RCAP border, there is a First Bank and Bank of America branch as well as a Save a Lot.

RCAP 4: Mark Twain



Location

Census Tract(s): 1076

City: St. Louis

State/County: MO/St. Louis city

School District: St. Louis City (Provisionally Accredited)

Ward: 1

Neighborhoods: Mark Twain

This RCAP includes just the southern half of Mark Twain Neighborhood plus a very small north section of Penrose Neighborhood. The area is bordered by N. Kingshighway on northwest, W. Florissant on the northeast, and Bircher/I-70 on the south until Shreve Ave. It includes a small area south of I-70, including Penrose Park. It also includes area north of Penrose Street and west of Shreve Ave. and

part of Penrose Park. The RCAP is divided by Interstate 70 and the Southern Pacific Railway.

Demographics

The area is overwhelmingly African-American with a high population density and relatively low vacancy rate. The population density is high despite having a sizable industrial space in the census tract and a railway running through it. The surrounding census tracts have a black population of around 98 percent, but poverty rate is lower (around 24 percent).

Description

One noticeable community planning project in the neighborhood is the Mark Twain Neighborhood Community Development Initiative (follow-up with Scott Associates).

Population

Total Population 3,123

Population Density (pop per mi²) 6,944

Race

African-American 98%

White <0.1%

Asian 0.1%

Other <0.1%

Hispanic <0.1%

Age

Over 65 11.2%

Under 18 17.4%

Poverty

Family Poverty Rate 34%

Individuals on Section 8 4%

Unemployment Rate 20%

Female-Headed Families 43%

Housing

Total Housing Units 1,194

Vacancy Rate 11.9%

LIHTC Units 15

Low Income Units 15

Public Housing Projects 1

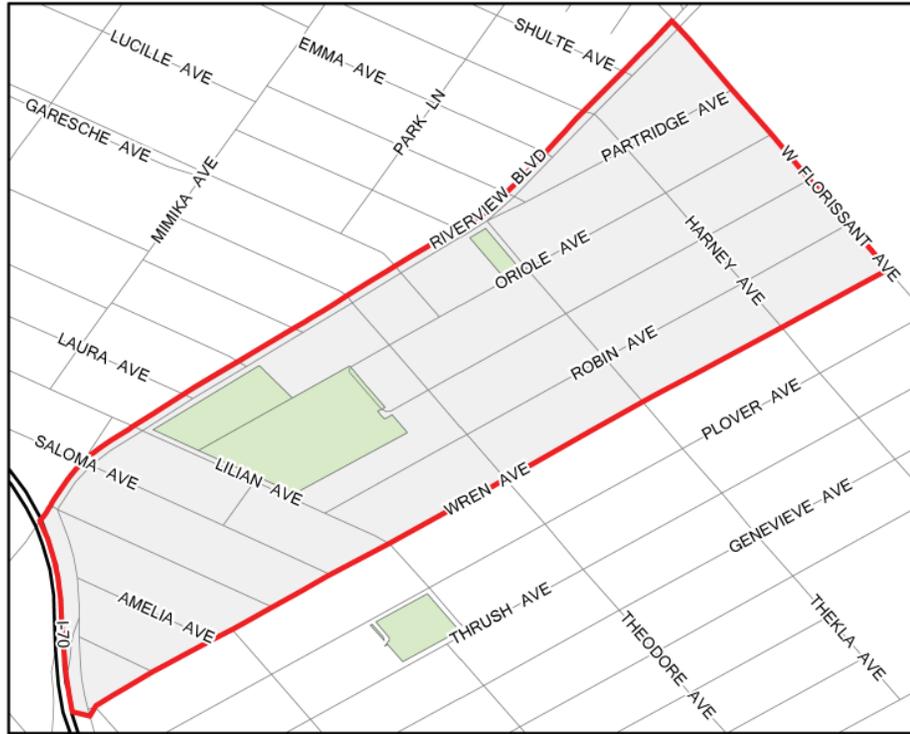
Amenities and Services

Banks 0

Full-service Supermarkets 0

Euclid Plaza Public Housing Project is located at the center of the RCAP. The area includes the industries EMS Group and Hammert's Iron Works. There is one public school and one private school immediately outside the census tract on Kingshighway. However, there are no libraries, full-service supermarkets, or banks near the RCAP.

RCAP 5: Walnut Park East



Location

Census Tract(s): 1072

City: St. Louis

State/County: MO/St. Louis city

School District: St. Louis Public Schools (P)

Ward: 27

Neighborhood (s): Walnut Park East

This RCAP includes the north section of Walnut Park East. It is bordered by Riverview Blvd. on the north, Bircher/I-70 on the west, Wren Ave. on the south and east, and W. Florissant on the east.

Demographics

The area has the highest percentage of people under 18 (39.5 percent) among all RCAPs as well as a considerably large share of seniors over 65 (13.5 percent). The area also has the highest vacancy rate (43 percent) of all RCAPs despite having a relatively high population density. Surrounding census tracts also are 98 percent black, but have poverty rates about 50 percent lower than this tract.

Description

There are no banks or full-service/limited service supermarkets within or in close proximity to the RCAP. Out of the four schools that are located in the RCAP, three are public and one is a private school. Three of the schools are elementary schools and one is a middle school. Riverview

Population

Total Population 1,017

Population Density (pop per mi²) 4,019

Race

African-American 96.8%

White 1.5%

Asian 0

Other 1.4%

Hispanic 0.3%

Age

Over 65 13.5%

Under 18 39.5%

Poverty

Family Poverty Rate 44%

Individuals on Section 8 9%

Unemployment Rate 23%

Female-Headed Families 38%

Housing

Total Housing Units 681

Vacancy Rate 43.8%

LIHTC Units 0

Public Housing Projects 0

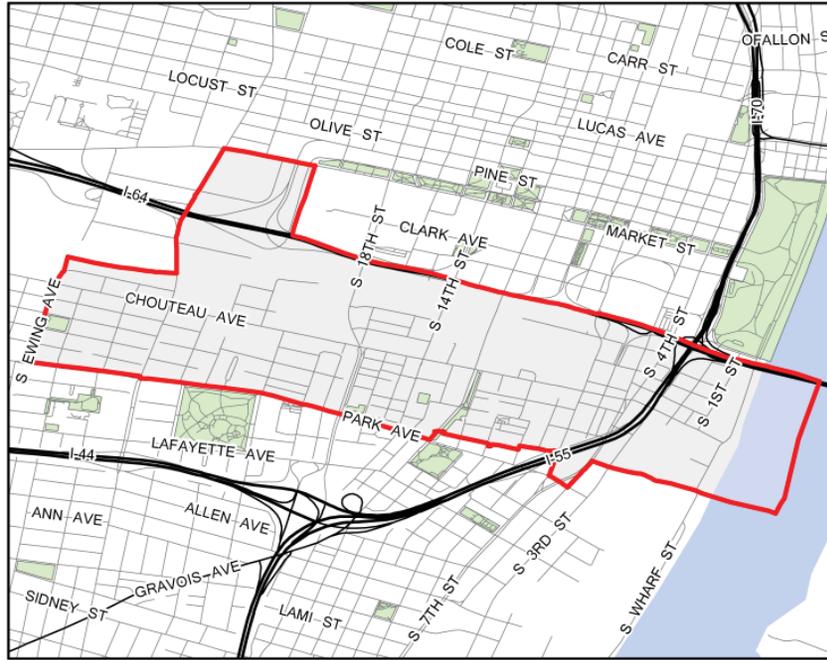
Amenities and Services

Banks 0

Full-service Supermarkets 1

West Florissant Development Corporation is active in the area (see RCAP 3).

RCAP 7: Peabody/Lasalle



Location

Census Tract(s): 1274

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 6, 7

Neighborhood (s): Peabody Darst Webbe,
LaSalle Park, Lafayette Square, Gate District

This area is bordered by the Mississippi River on the east, I-64/40 on the north, Market Street on the northwest, Jefferson on the west until the railroad tracks to Ewing Street on the west, and Park Ave. on the south until River and Rutgers streets. It incorporates the southern part of Downtown and Downtown West, the northeast section of the Gate District, the northern part of Lafayette Square, Peabody Darst Webbe, LaSalle Park, and the very north part of Kosciusko.

Demographics

Compared to most other RCAPs, this area has a larger white population (24.5 percent). The RCAP has a high concentration of public housing projects which might explain the area's very high poverty rate (55 percent). The north side of the RCAP has less population density, with multiple railway tracks running through it.

Description

The old Darst Webbe Housing Project was in this census tract, which was later demolished by the St. Louis Housing Authority in the 1990s and replaced by mixed income development. The Kosciusko Redevelopment Project (1957) in the Kosciusko Neighborhood displaced many residents, who settled in this area.

The RCAP has four public schools, two of which are elementary schools and two that

Population

Total Population 4,498

Population Density (pop per mi²) 3,303

Race

African-American 71.6%

White 24.5%

Asian 1%

Other 1.3%

Hispanic 1.3%

Age

Over 65 7.7%

Under 18 35.8%

Poverty

Family Poverty Rate 55%

Individuals on Section 8 No data

Unemployment Rate 17%

Female-Headed Households 27%

Housing

Total Housing Units 2,295

Vacancy Rate 12.8%

LIHTC Units 478

Low Income Units 394

Public Housing Projects 5

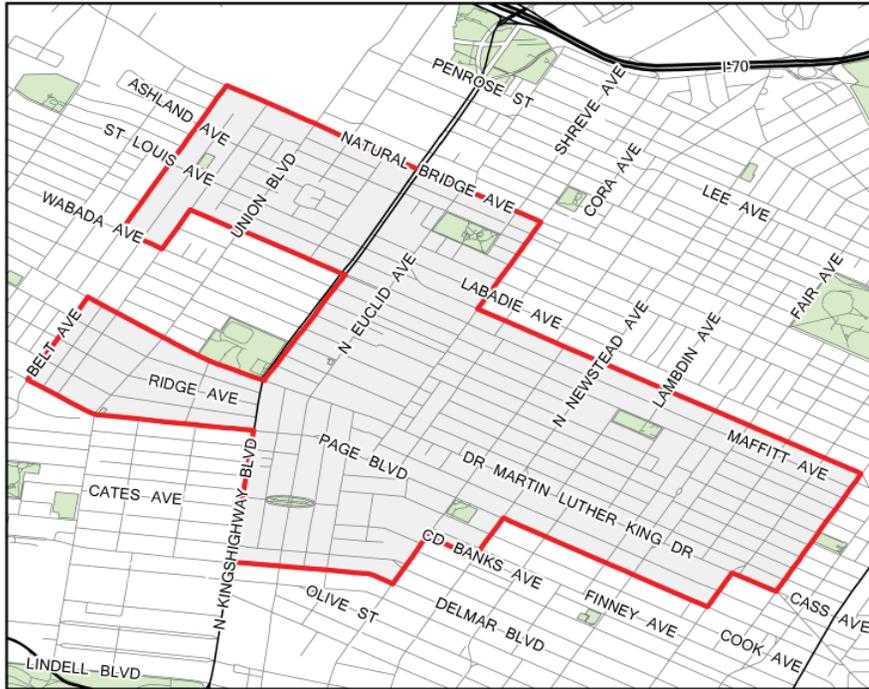
Amenities and Services

Banks 0

Full-service Supermarkets 0

are high schools. Mission: St. Louis, a nonprofit organization, is active in the area. The area is extremely underserved, as there are no full-service supermarkets (although ground is broken for a Schnucks), limited-service stores, or bank branches in or immediately surrounding the RCAP. The Barr Branch of the St. Louis Public Library is on Jefferson Avenue, just south of the RCAP.

RCAP 8: The Greater Ville



Location

Census Tract(s): 1064, 1066, 1067, 1112, 1113, 1114, 1123

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools (Provisionally Accredited)

Wards: 1, 4, 22, 26

Neighborhoods: The Ville, Fountain Park, Kingsway East

This area includes neighborhoods of the Ville, a portion of the Greater Ville, Vandeventer, Fountain Park, most of Lewis Place, Kingsway East, the north part of Kingsway West, the north part of Academy, and the northeast part of Wells Goodfellow. It is bounded by Prairie Ave. and Vandeventer Avenue on the east, Page Blvd. on southeast, Newstead and Delmar on the south to Kingshighway, Page Blvd. on the southwest

to Belt Ave. on the west. It excludes the census tract surrounding Sherman Park. It is bound on the north by Natural Bridge and St. Louis avenues.

Demographics

This area has very high unemployment (30 percent) and vacancy (30 percent) rates.

Description

The Ville Neighborhood, located at the center of this RCAP, is one of the first African-American neighborhoods in St. Louis. The RCAP is home to many schools, both public and private. There are also five full-service supermarkets in the area. However, the RCAP does not include any public libraries, and it has a serious shortage of banking services as evidenced by the high person-to-bank ratio.

Population

Total Population 15,613

Population Density (pop per mi²) 5,809

Race

African-American 96.2%

White 1.3%

Asian 0.1%

Multiethnic 1.3%

Hispanic 0.8%

Age

Over 65 13.2%

Under 18 25.4%

Poverty

Family Poverty Rate 40%

Individuals on Section 8 5%

Unemployment Rate 30%

Female-Headed Households 34%

Housing

Total Housing Units 9,692

Vacancy Rate 30%

LIHTC Units 558

Low Income Units 558

Public Housing Projects 3

Amenities and Services

Banks 3

Full-service Supermarkets 5

North Side Community Housing Inc. (NCHI), a nonprofit organization active in the area, has been engaged in housing development in the Greater Ville area, including low income housing tax credit development. RHCDA and Desales Community Housing Corporation have also completed some housing development on Dick Gregory Place.

RCAP 9: Wells Goodfellow



Location

Census Tract(s): 1062

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 22

Neighborhoods: Wells Goodfellow

The census tract is bound by Goodfellow Blvd. on the east, Natural Bridge on the north, Irving Avenue on the west, and MLK Drive on the south.

Demographics

The neighborhood has a very high housing vacancy rate (35.7 percent). The population of youth under 18 (37.9 percent) and the family poverty rate are also high (45 percent). The

population density is considerably high, given that a big portion of the RCAP is industrial.

Description

The landscape of the neighborhood is very industrial, as it is divided by the train track that runs through the middle of the census tract. A junkyard and a forested area encompass a big portion of the west side of the RCAP just south of the railway, which extends into the east side of Wellston. A public housing project is also located in the RCAP. The area north of the railway tracks is mostly industrial, with a small pocket of residential housing. The neighborhood includes the St. Louis Transitional Hope House, which is a transitional housing program for families that provides training in jobs skills, life skills, and healthcare. Laclede Elementary School is also situated in the area.

Population

Total Population 1,701

Population Density (pop per mi²) 4,138

Race

African-American 96.4%

White 1%

Asian 0.4%

Multiethnic 1.8%

Hispanic 0.3%

Age

Over 65 11.1%

Under 18 37.9%

Poverty

Family Poverty Rate 45%

Individuals on Section 8 3%

Unemployment Rate 22%

% Female-Headed Households 43%

Housing

Total Housing Units 1,053

Vacancy Rate 35.7%

LIHTC Units 11

Low Income Units 11

Public Housing Projects 0

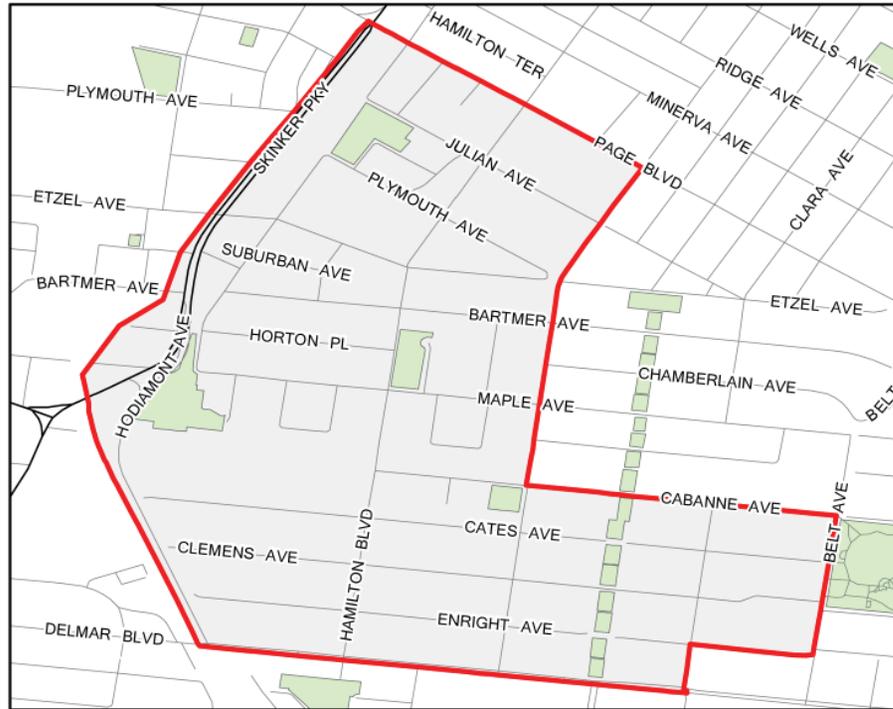
Amenities and Services

Banks 0

Full-service Supermarkets 0

Energy Petroleum Co. and Alberici Constructors are in the north side of the RCAP. Regions Bank has a branch just outside the area, on MLK Drive. There are no full-service or limited-service grocery stores in the area or nearby.

RCAP 10: West End



Location

Census Tract(s): 1053, 1054

City: St. Louis

State/County: MO/ St. Louis County

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 22, 26

Neighborhood: West End

This RCAP is bound on the north by Page Avenue, on the east by Goodfellow Blvd., Cabban and Belt avenues, on the south by Enright and Delmar Blvd., and on the west by Hodiadmont and Skinker Blvd. Washington University's North Campus is on its western border.

Demographics

This area has a very high population density and is more racially diverse than most RCAPs. The RCAP has a very high family poverty rate (48 percent) and a high vacancy rate (26 percent). All LIHTC and Section 8 vouchers are in Census Tract 1054.

Description

There are no schools, libraries, banks, or full-service supermarkets in this RCAP despite its high population level. A private elementary Christian school and a college prep school are located just outside of the RCAP on Maple Avenue. The Delmar MetroLink stop is in this area. There are no active social service organizations in this area.

Population

Total Population 4,622

Population Density (pop per mi²) 7,193

Race

African-American 83.8%

White 6.7%

Asian 1.4%

Multiethnic 2.4%

Hispanic 5.1%

Age

Over 65 10.6%

Under 18 28.4%

Poverty

Family Poverty Rate 48%

Individuals on Section 8 5%

Unemployment Rate 19%

Female-Headed Households 32%

Housing

Total Housing Units 2,713

Vacancy Rate 26%

LIHTC Units 298

Low Income Units 298

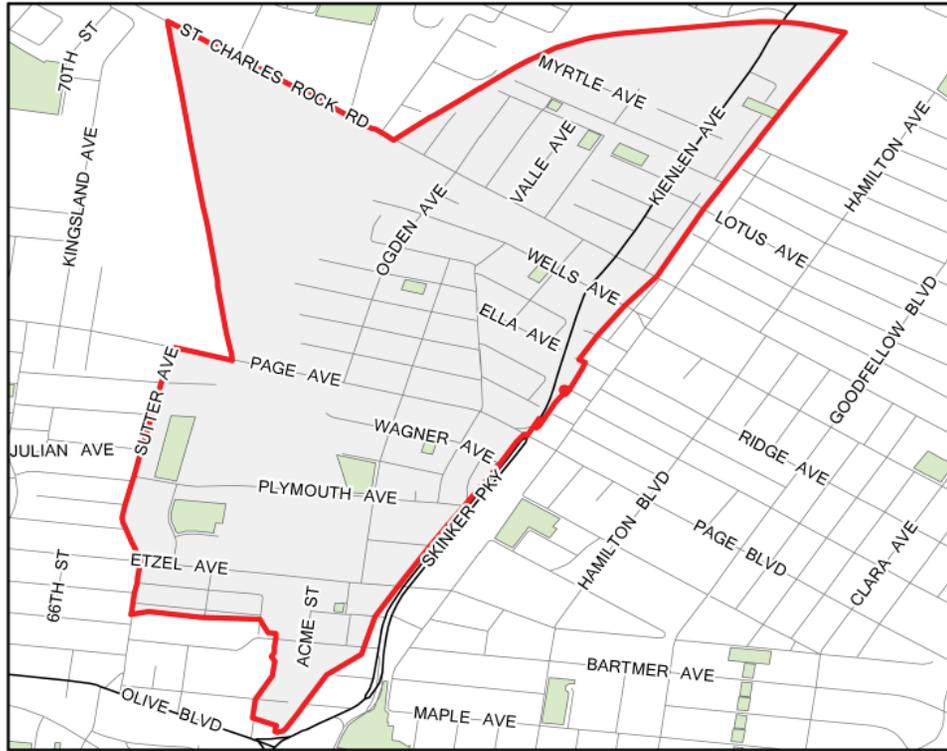
Public Housing Projects 0

Amenities and Services

Banks 0

Full-service Supermarkets 0

RCAP 11: Wellston



Location

Census Tract(s): 2139

City: Wellston

State/County: MO/St. Louis County

School District: Normandy

This census tract is bound by Skinker on the east, the railway track and MLK Drive on the north and northwest, the MetroLink track and Sutton Avenue on the west, and Bartmer Avenue on the south. It includes the municipality of Wellston in St. Louis County.

Demographics

The census tract has a high percentage of female-headed households and people under 18.

Description

The Met Center, which offers job training, career development, and transportation services for unemployed and underemployed residents, is located in the RCAP. The RCAP also includes the Wellston MetroLink Station and three schools. No libraries or full-service supermarkets exist in or around the area, although the Wellston Foods Market (a limited-service supermarket) is located there. Regions Bank also has a branch in the RCAP on MLK Drive.

This is the only RCAP in St. Louis County with a municipal government, which is the city of Wellston. The school district was dissolved in 2010, and the city became part of the Normandy School District, which lost its

Population

Total Population 2,036

Population Density (pop per mi²) 2,236

Race

African-American 96.5%

White 1.1%

Asian 0.2%

Multiethnic 1.6%

Hispanic 0.4%

Age

Over 65 8.9%

Under 18 40.8%

Poverty

Family Poverty Rate 39%

Individuals on Section 8 6%

Unemployment Rate 20%

Female-Headed Households 48%

Housing

Total Housing Units 993

Vacancy Rate 30.6%

LIHTC Units 38

Low Income Units 38

Public Housing Projects 1

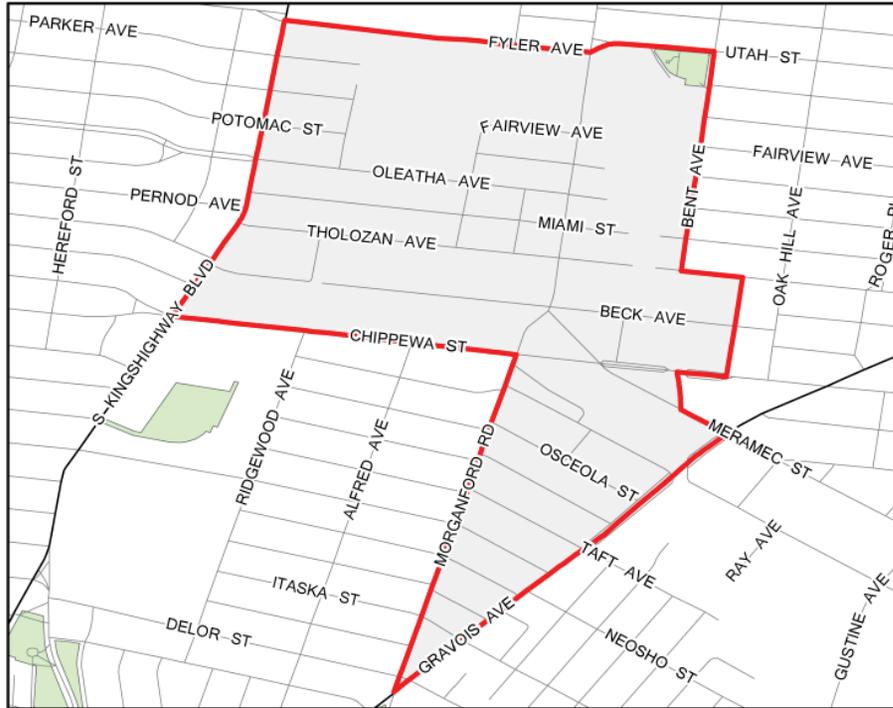
Amenities and Services

Banks 1

Full-service Supermarkets 0

accreditation in 2012. The Community Resource and Development Organization (CRADO) and the Regional Housing and Community Development Alliance (RHCD) are two organizations that have done redevelopment work in the area. This RCAP is part of Beyond Housing's 24:1 Community Building Initiative.

RCAP 12: Morganford/ West Tower Grove South



Location

Census Tract(s): 1152

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 10, 14, 15

Neighborhood: Tower Grove South

The census tract is bounded by Flyer Ave. on the north, Kingshighway on the west, and Chippewa on southwest to Morganford. Gravois Rd. is the southeast border until Bent Ave. on the east.

Demographics

This census tract is among the most racially diverse in the St. Louis area. This is the only RCAP in the region where the proportion of

the African-American population is less than 50 percent (31 percent). The biggest racial/ethnic group is whites (45 percent). The RCAP also has the highest percentage of Hispanic people among all RCAPs.

Description

The RCAP is industrial along north and east boundaries, along Flyer and down Bent Ave. The areas all along Kingshighway and Chippewa are commercial. Housing is concentrated in the center of the area and in the area between Gravois and Morganford.

There are three elementary schools located in the RCAP, two of which are private. A public middle school is also located just outside the RCAP. There is also a Shop 'n Save and a Southern Commercial Bank in the area.

Population

Total Population 2,855

Population Density (pop per mi²) 5,486

Race

African-American 31%

White 45%

Asian 8%

Multiethnic 4%

Hispanic 12%

Age

Over 65 7.1%

Under 18 25.2%

Poverty

Family Poverty Rate 37%

Individuals on Section 8 2%

Unemployment Rate 12%

Female-Headed Households 24%

Housing

Total Housing Units 1,688

Vacancy Rate 20.1%

LIHTC Units 64

Low Income Units 64

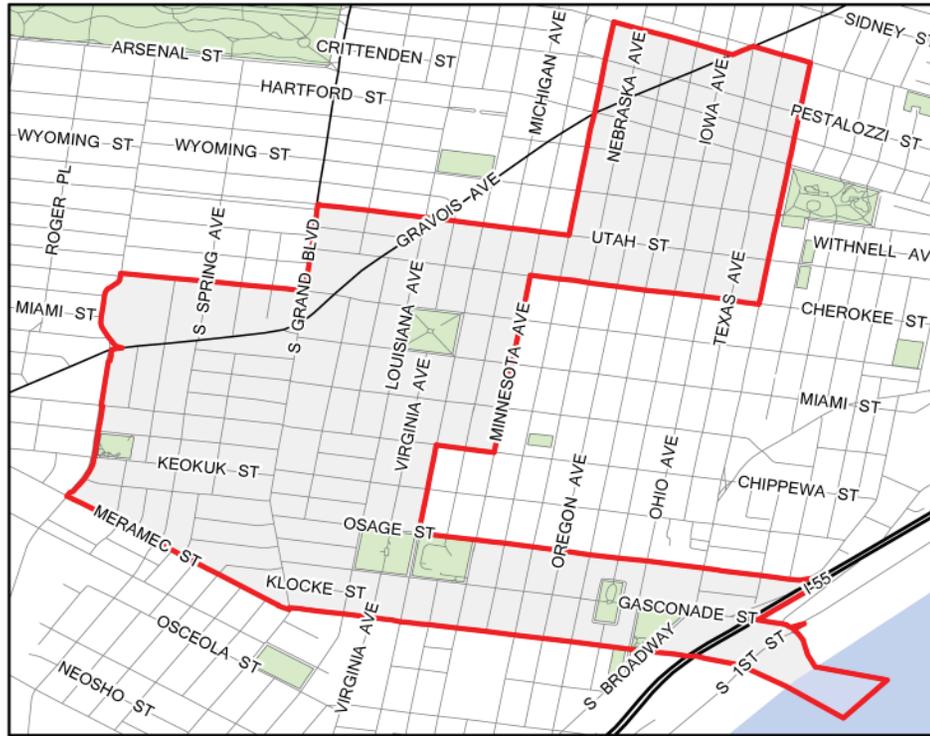
Public Housing Projects 0

Amenities and Services

Banks 1

Full-service Supermarkets 1

RCAP 13: Gravois Park/ Benton Park West



Location

Census Tract(s): 1163.02, 1164, 1157, 1242

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 9, 15, 20, 25

Neighborhood: Gravois Park, Benton Park
West

The northern boundary is Magnolia from Jefferson to Pennsylvania Avenue, Utah Street from Pennsylvania to Grand, and Potomac Street from Grand to Gustine Avenue. The southern boundaries are Cherokee Street, Chippewa Street, and Meramec Street. The area between Jefferson, Michigan, Cherokee, and Osage is not in the RCAP.

Demographics

This RCAP has a relatively low African-American population compared with other RCAPs (55 percent). With a population density of 11040 (per mi²), the RCAP is the most densely populated area among all the RCAPs despite having a relatively high vacancy rate of 27 percent.

Description

The RCAP has five schools, three of which are private schools. There are also three full-service supermarkets in the area, including Schnuck's Market, Aldi Food Store, and Jay's International Foods. The RCAP has five full-service bank branches and a public library.

Population

Total Population **14,773**

Population Density (pop per mi²) 11,040

Race

African-American 55.5%

White 24.6%

Asian 6.7%

Multiethnic 3.6%

Hispanic 9.3%

Age

Over 65 6.5%

Under 18 28.7%

Poverty

Family Poverty Rate 35%

Individuals on Section 8 5%

Unemployment Rate 19%

Female-Headed Households 27%

Housing

Total Housing Units 8,085

Vacancy Rate 27%

LIHTC Units 4

Low Income Units 4

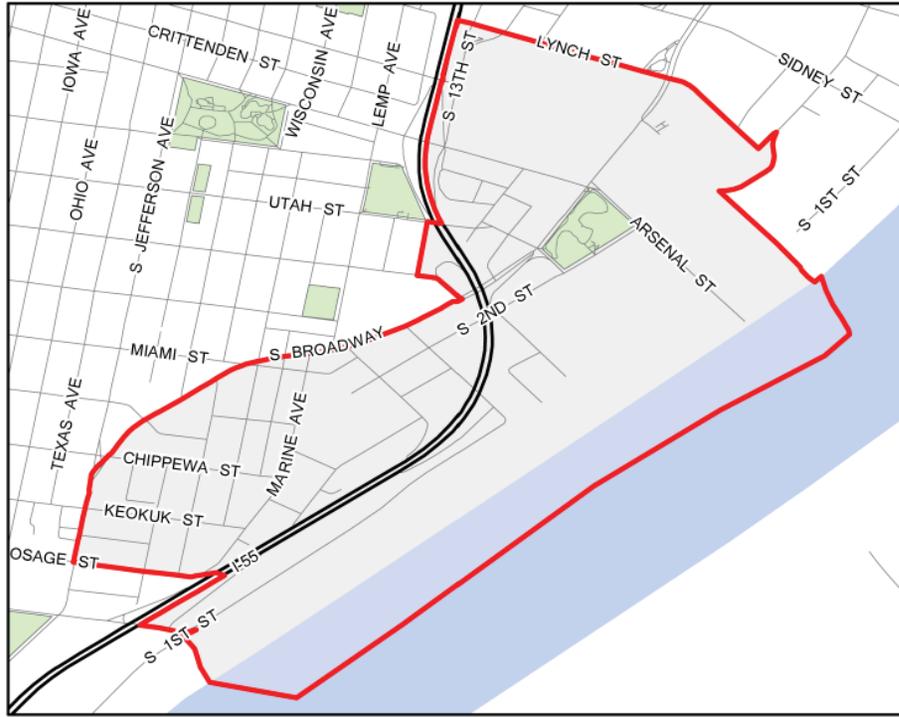
Public Housing Projects 0

Amenities and Services

Banks 5

Full-service Supermarkets 3

RCAP 14: Marine Villa/ South Riverfront



Location

Census Tract(s): 1246

City: St. Louis

State/County: MO/city of St. Louis

School District: St. Louis Public Schools
(Provisionally Accredited)

Wards: 9, 20

Neighborhood: Marine Villa, South Riverfront

This RCAP is bordered by Jefferson to S. Broadway on the southwest, I-55 on the northwest, Lynch Street on the north, Riverfront on the east, and Gasconade on the south.

Demographics

This area has a very low unemployment rate compared to other RCAPs (8 percent). Furthermore, it has a relatively low population

density and a lower percentage of African-Americans (62 percent) compared to most RCAPs.

Description

The South Riverfront side of the RCAP is mostly industrial. Housing is concentrated in the southwest of the census tract. It also includes Anheuser Busch Brewery on the north. There is one public K-5 elementary school in the RCAP and two public schools immediately outside of the RCAP. There is also a Labodega Wholesale Foods supermarket and a Regions Bank in the area. The entire area between Broadway, I-55, Arsenal, and Lynch Street is occupied by the Anheuser Busch Brewery. The northeast side of the area is entirely industrial. The Marine Villa Neighborhood Association is an active organization in the area.

Population

Total Population 1,859

Population Density (pop per mi²) 1,760

Race

African-American 61.6%

White 28.3%

Asian 1.8%

Multiethnic 2.4%

Hispanic 5.7%

Age

Over 65 5.4%

Under 18 30.4%

Poverty

Family Poverty Rate 43%

Individuals on Section 8 8%

Unemployment Rate 8%

Female-Headed Households 26%

Housing

Total Housing Units 1,024

Vacancy Rate 17.1%

LIHTC Units 83

Low Income Units 83

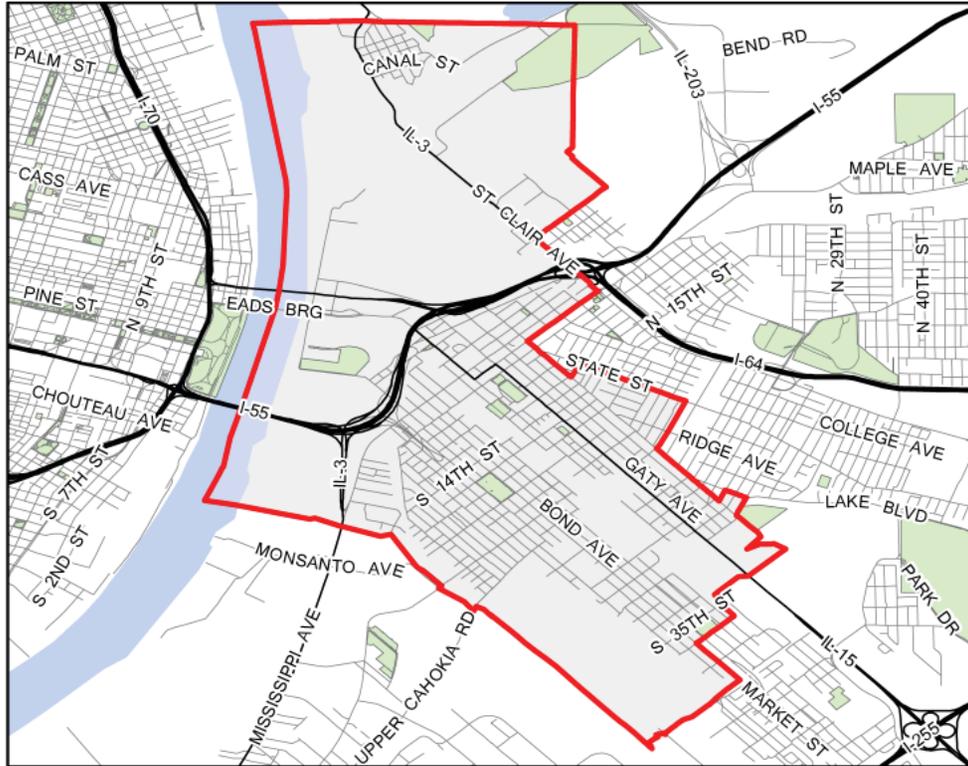
Public Housing Projects 0

Amenities and Services

Banks 1

Full-service Supermarkets 1

RCAP 15: East St. Louis



Location

Census Tract(s): 5009, 5011, 5045

City: East St. Louis

State/County: IL/St. Clair County

Cities: East St. Louis, National City, Brooklyn

School Districts: East St. Louis School District 189, Brooklyn Unit School District 188

The three census tracts in the RCAP include most of East St. Louis, Brooklyn, and western points of Fairmont City. It is bound by the county line to the north and the Mississippi River to the west. The south border follows the railroad tracks. The southeast border is at 39th Street, up until Piggott Ave., and then 36th Street until Martin Luther King Dr. The boundary jogs up to State Street. The eastern

border is roughly perpendicular to I-55 and I-64 intersection, following N. 9th Street, until St. Clair Ave., and then 1st Street until going north to the county border.

Demographics

This RCAP has a very high family poverty rate (49 percent), a high percentage of people under 18 (32.6 percent), and a low population density. The RCAP also has a high concentration of railway tracks, especially in the southern area, preventing the development of cohesive neighborhoods.

Population

Total Population 10,942

Population Density (pop per mi²) 1,124

Race

African-American 97.7%

White 0.7%

Asian 0

Multiethnic 0.9%

Hispanic 0.5%

Age

Over 65 11%

Under 18 32.6%

Poverty

Family Poverty Rate 49%

Individuals on Section 8 1%

Unemployment Rate 16%

Female-Headed Households 42%

Housing

Total Housing Units 5,421

Vacancy Rate 18.7%

LIHTC Units 0

Public Housing Projects 15

Amenities and Services

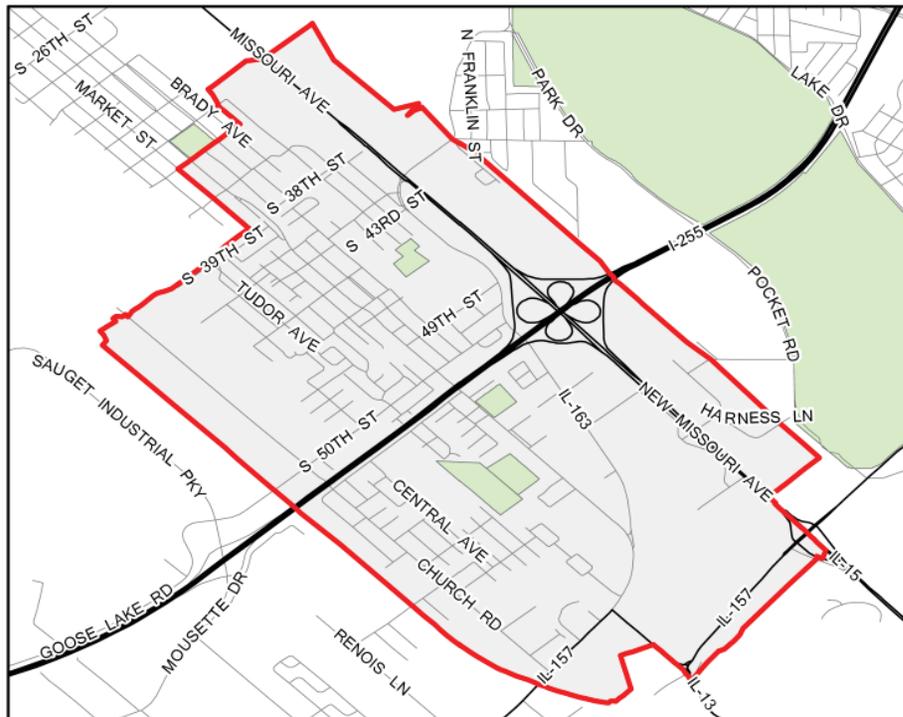
Banks 3

Full-service Supermarkets 1

Description

There are 12 schools in the area but no public libraries. The RCAP has three banks on the eastern side and only one full-service supermarket.

RCAP 16: Alorton/ Centreville



Location

Census Tract(s): 5025, 5027, 5028

City: Alorton

State/County: IL/St. Clair

School District: Cahokia Community School District (Accredited), East St. Louis School District 189

The RCAP includes all of Alorton and the south section of Centreville. The boundary on the northeast is just above New Missouri Ave., and the southeast border is at IL-157. The southwest border is along the railway tracks south of Church Rd. The northwest border is S. 39th Street, until S. 36th Street.

Demographics

The area has a very high family poverty rate. The housing vacancy rate is low compared to other RCAPs and close to the regional level.

Description

There is one school and library in the area. No banks or full-service supermarkets are present in the census tract.

Population

Total Population 5,126

Population Density (pop per mi²) 1,226

Race

African-American 97%

White 1.3%

Asian 0.1%

Multiethnic 1.1%

Hispanic 0.4%

Age

Over 65 11.9%

Under 18 34.2%

Poverty

Family Poverty Rate 51%

Individuals on Section 8 4%

Unemployment Rate 24%

Female-Headed Households 42%

Housing

Total Housing Units 2,210

Vacancy Rate 10.8%

LIHTC Units 120

Low Income Units 120

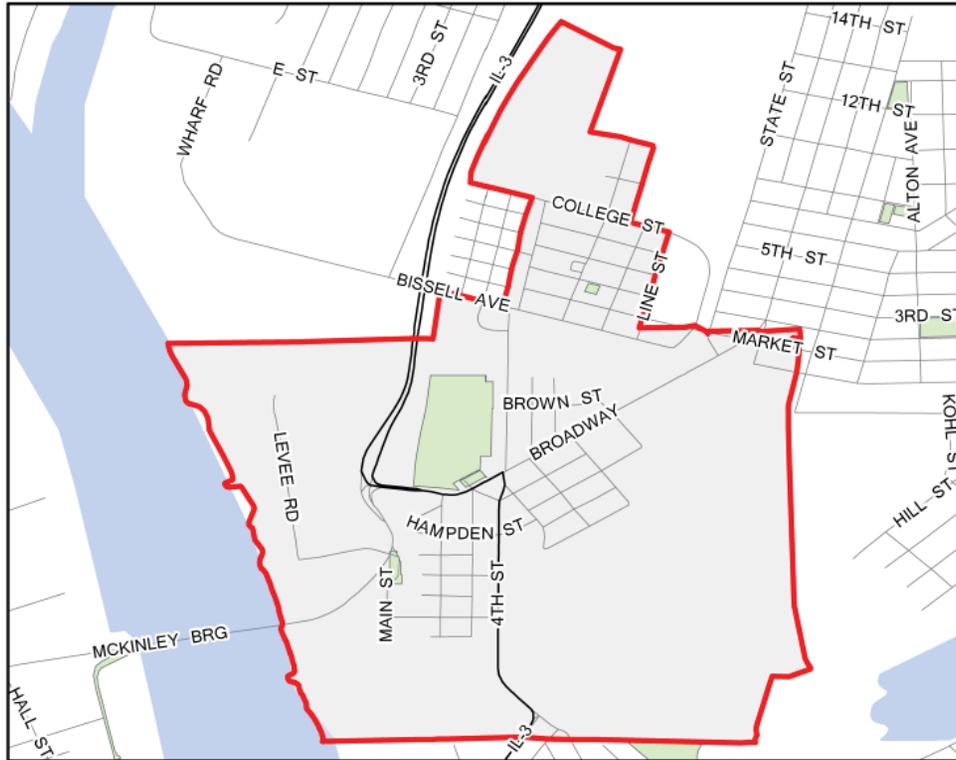
Public Housing Projects 7

Amenities and Services

Banks 0

Full-service Supermarkets 0

RCAP 18: Venice



Location

Census Tract(s): 4007

City: Venice

State/County: IL/Madison County

School District: Venice Community Unit School District (Accredited), Madison Community Unit School District (Accredited)

This RCAP is bound by the Mississippi River on the west and the Madison County border on the south (just north of Brooklyn and N. 2nd Street). The eastern border is along railroad tracks just south of where Madison Ave. ends. The northeast border follows Market Street until Line Street Alley and the industrial area north of Madison Street. The border on northwest follows IL-3 down until Madison Street, and then

goes down Bacum Ave. until Bissell Ave. and follows that roughly until the river. It includes all of Venice.

Demographics

The population density is very low, possibly due to the fact that a huge section of the eastern half of the RCAP is industrial, with multiple railway tracks running through it. The surrounding census tracts have a significantly higher white population and have significantly lower poverty rates (Granite City and Madison).

Description

The RCAP has two public elementary schools and one public library. There are no banks or full-service supermarkets in the RCAP.

Population

Total Population 1,676

Population Density (pop per mi²) 921

Race

African-American 93.5%

White 3.2%

Asian 0.1%

Multiethnic 1.3%

Hispanic 1.7%

Age

Over 65 14%

Under 18 33.5%

Poverty

Family Poverty Rate 40%

Individuals on Section 8 4.5%

Unemployment Rate 16%

Female-Headed Households 42%

Housing

Total Housing Units 960

Vacancy Rate 29.8%

LIHTC Units 92

Public Housing Projects 1

Amenities and Services

Banks 0

Full-service Supermarkets 0

4

Disparities in Access to Opportunity



Where a person lives determines their access to opportunities that have an impact on quality of life. Those opportunities are where children can attend school, how they move around, and what jobs are nearby. This chapter of the FHEA examines access to opportunities that may differ based on race and ethnicity. Opportunity is measured in this report using indicators created by HUD that measure poverty, school proficiency, labor market engagement, job access, transit access and environmental health hazards exposure.⁹⁹ Of course, there are other dimensions of opportunity that are not captured in this analysis, like crime and social support structures. The discussion is not intended to be absolute. The purpose of this analysis is to assess disparities in access to opportunities for racial and ethnic minorities across the St. Louis region.

First, this chapter examines exposure to opportunity indicators for households by race and ethnicity, finding substantial disparities between African-Americans and whites in poverty, school

proficiency, and labor market engagement. The opportunity indicators are then examined geographically across the region to identify levels of opportunity for particular neighborhoods along each individual dimension. Then, areas that have high opportunity indicators are identified and described as Areas of Opportunity.

Exposure to Opportunity Dimensions

Table 17 displays the opportunity indices for all persons by race and ethnicity. The opportunity exposure data considers the weighted average neighborhood percentile ranking and the population group by race and ethnicity.¹⁰⁰ Higher percentile values reflect more favorable average neighborhood characteristics on all opportunity indicators. For example, a score of 100 on any indicator would reflect better characteristics and a score of 10 reflects poorer characteristics. For the purpose of this report, the indicators are examined between the total population,

white, African-American, Hispanic and Asian.

On a whole, the St. Louis metro area ranks in the middle of all opportunity indices with scores around 50, except for on the transit access index, which is at a score of 32 for all persons in the region. The poverty index for all persons is 56, as is the school proficiency index. The labor market engagement index is 57 for all persons, and the job access index is slightly lower at 51 for all persons. Health hazards exposure index is above the other indicators at 60 for all persons. The index for all persons in all households is considered in this study the average for the St. Louis region. The level of opportunity for all persons is compared to the opportunity indicators for each racial and ethnic group.

Among the white population, the opportunity indices are above average in poverty index, school proficiency, labor market engagement, and just slightly above in environmental health hazards exposure. Transit access index for white persons

is below the average.

Job access for the white population is the same as the average for all persons.

Opportunities for African-American populations are strikingly low on all opportunity indices, with the exception of transit access, which is well above the average at 62. School proficiency index is the lowest indicator at only 27. The poverty index and labor market engagement index for black persons are also low at 31 and 32, respectively.

Hispanic persons have opportunity indices that are all just slightly below or about the same as the dimensions for *all persons*.

99 Opportunity Indicators were created by HUD as part of the FHEA data package downloaded as of August 2012 from www.huduser.org/portal/sustainability/grantees/data.html. A description of each indicator is provided in the more detailed discussion of the indicators starting on Page 70 and in Appendix 2.

100 FHEA Data Documentation, page 9.

Also on Table 17 are the disparities for opportunity dimensions between white persons and minority persons by race and ethnicity. A positive value corresponds with whites having a higher ranking, and negative values correspond with the racial or ethnic group having a higher ranking on that particular index.

Most notable is the high disparity between black and white persons. Particularly on poverty index, school proficiency index, and labor market index, the disparity is the highest with whites faring more than 30 points higher than blacks in each of those opportunities. The transit access index has the biggest number of disparity, with -41 between black/white persons. This means that transit access is significantly higher for black persons and actually all minority groups, as all other race and ethnic groups fare better than white persons on transit accessibility.

Further disparities exist between minority population and white population when the opportunity indicators are compared among persons in poverty (Table 18).

The indicators decrease for all persons in poverty compared to all persons overall, with the exception of job access index and transit access index. These both increase for poor persons compared to the

average among all persons in the region, substantially so for transit access index.

Table 17: All Persons (All Households)

Opportunity Dimensions:	All	White	Black	Hispanic	Asian	Disparities		
						Black/White	Hispanic/White	Asian/White
Poverty Index	56	63	31	52	67	32	11	-4
School Proficiency Index	56	64	27	52	66	37	13	-1
Labor Market Engagement Index	57	63	32	55	72	31	8	-9
Job Access Index	51	51	49	54	59	2	-3	-7
Transit Access Index	32	23	64	37	40	-41	-14	-17
Health Hazards Exposure Index	60	62	56	59	60	6	3	1
Counts	2,571,253	1,900,000	508,630	67,490	58,867			

Source: HUD FHEA data

Table 18: Persons in Poverty

Opportunity Dimensions:	All Poor Persons	Poor White Persons	Poor Black Persons	Poor Hispanic Persons	Poor Asian Persons	Disparities		
						Black/White	Hispanic/White	Asian/White
Poverty Index	34	49	19	35	51	29	13	-2
School Proficiency Index	38	53	23	40	47	30	13	6
Labor Market Engagement Index	38	50	24	43	62	26	7	-12
Job Access Index	52	53	49	55	58	3	-2	-5
Transit Access Index	50	29	71	43	56	-42	-15	-28
Health Hazards Exposure Index	39	50	29	40	39	21	9	10
Counts	298,624	134,564	138,380	11,479	6,212			

Source: HUD FHEA data

The racial disparities in access to opportunity among persons in poverty follow the same trends for all persons. The disparities are highest between blacks and whites, particularly on school proficiency index and poverty index. Poor African-Americans have an extremely low poverty index at 19, while white poor persons have a poverty index of 49. Transit access for poor black persons increased compared to all black persons.

Access to opportunity among children is another significant indication of racial and ethnic disparities in our region (Table 19).

The disparities in exposure to opportunity between minority children and white children are starker than the disparities between all households. Black children are significantly more likely to have low exposure to opportunities.

The lowest indicator among black children is on school proficiency index. Black children have a school proficiency index of 27. The disparity among black

Table 19: All Children

Opportunity Dimensions:	Disparities							
	All Children	White Children	Black Children	Hispanic Children	Asian Children	Black/White	Hispanic/White	Asian/White
Poverty Index	55	65	29	50	70	36	15	-6
School Proficiency Index	57	67	27	50	71	40	18	-4
Labor Market Engagement Index	56	64	31	53	74	33	11	-10
Job Access Index	50	50	48	53	56	2	-3	-6
Transit Access Index	30	19	63	36	32	-44	-17	-13
Health Hazards Exposure Index	61	63	56	58	61	7	4	1
Counts	612,570	413,717	147,665	17,425	13,770			

Source: HUD FHEA data

children and white children is the highest, considering white children have school proficiency index of 67. This issue of racial disparity in accessing quality education is a significant problem for the region.

Poverty among black children is also a significant regional problem. Black children have a lower poverty index than all black households, with a poverty index of 29 for black children. Compared to a poverty index for white children at 65, the disparity in poverty between black and white children is extremely high.

Another stark disparity is in the transit access index. The disparity between black children and white children at -44, meaning black children have greater access to transit than white children, is higher than the disparity between households, which is -41. White children have a transit access indicator at 19. The difference between white children and white households could be attributed to a higher number of young adults without children living in the urban center that have access to transportation.



Conclusions

Based on the exposure to opportunity indicators, the biggest concern in racial disparities are among the poverty index, school proficiency index, and labor market engagement index between the African-American and white community. Disparity in transit access is another issue, although the concern is the lack of access to transportation for white communities.

Poverty is concentrated in African-American communities. Black persons in poverty are even more likely to live in a poor community than their counterparts of other races. Poor white persons are less exposed to an overall poor neighborhood.

The disparity in school performance is a stark racial disparity. Black households, particularly in the effect on black children, are at a considerable disadvantage when it comes to accessing higher performing schools.

Blacks also have employment disparities in participating in the labor market, however there is not a disparity in job access. This signifies that job centers are relatively distributed throughout both black and white communities, and that the disparity in labor force participation is due to something other than physical access to jobs. This could signify a disparity in the type of jobs that are available in black communities or a disparity in the level of job training or skills required to access employment.

The challenge with the disparity in transit access is the lack of exposure to transit in white communities. Black communities have high levels of transit access. This difference in black communities between a high indicator for transit and significantly lower indicators for other opportunities like schools and employment demonstrates a mismatch and a limitation of the opportunities accessed via transit.

Opportunity Indicators in the Region

The exposure to opportunities discussion (starting on page 66) indicates significant disparities between minority households and white households. Considering the segregation patterns in St. Louis, the following analysis examines spatial disparities for each opportunity indicator. Again, HUD provided data for six opportunity indicators on a block group level.¹⁰¹ Each indicator is mapped by census block groups on a 0–100 score in breaks of 10. For all indicators, lower values (represented by yellow) reflect less favorable characteristics and higher values (represented by blue) reflect more favorable characteristics.

1. Poverty Index

To create a poverty index, HUD incorporated poverty rates by block groups with public assistance recipients. The index is a linear combination of family poverty rate and the percentage of households receiving public assistance.¹⁰² Map 18 displays the poverty index.

The lowest values on the poverty index correspond with high family poverty rates and high percentage of public assistance recipients. The areas with the lowest poverty index are concentrated in north St. Louis city and northwest St. Clair County, IL.

Almost all areas north of Delmar Blvd. in St. Louis city have a very low poverty index. South St. Louis city also has areas with extremely low poverty index, concentrated along the riverfront into Carondelet. In north St. Louis County, municipalities of Spanish Lake, Wellston, Pine Lawn, Northwoods, and parts of Jennings also have the lowest levels of

poverty index. The areas of Berkeley and Kinloch also have the lowest levels in north St. Louis County. In Illinois, the areas with the lowest poverty index levels are in East St. Louis, Brooklyn, Alorton, and Washington Park. Two block groups in East St. Louis are the exception, with above average poverty index ratings.

The areas with the highest indicator on the poverty index—meaning the lowest poverty rates and lowest public assistance recipients—are highly concentrated in a few areas but are dispersed across smaller areas further out from the center city.

Municipalities in west St. Louis County have high concentration of a high index, including Creve Coeur, Town and Country, Chesterfield, Frontenac, Des Peres, Eureka and Wildwood. The areas of Clayton and Brentwood in the inner-ring suburb areas of St. Louis County also have high poverty index.

In Jefferson County, Arnold and Barnhart have the highest poverty index, along with Barnhart. St. Charles County has many places with highest levels of poverty index, including Lake St. Louis, Cottleville, Weldon Spring, and Dardenne Prairie. In Illinois, O’Fallon, and the area just west of Belleville are high poverty index areas. Monroe County overall has relatively high poverty index.

¹⁰¹ Data was provided in a shapefile on a block group level as part of the FHEA data package as of August 2012 at <http://www.huduser.org/portal/sustainability/grantees/data.html>.

¹⁰² FHEA Data Documentation, page 6.

2. School Proficiency Index

School proficiency index is measured on the block group level to demonstrate elementary school performance. According to HUD data documentation (See Appendix 2), this index uses elementary school data on reading and math state test scores. Data on neighborhoods are from the School Attendance Boundary Information System or uses school attendance by district proximity.¹⁰³ Map 19 displays the school proficiency index.

It should be noted that this data is extremely limited. Only including elementary school data is a very narrow focus on school performance. Another limitation of this data is that the data does not account for magnet schools and charter schools, which are not neighborhood-based and draw on students from a wider geographical range.¹⁰⁴

The school proficiency index is at its lowest in St. Louis city and north St. Louis County. These areas have most of the predominately minority population in the St. Louis region.

The most severe issues with school proficiency, scores under 10, include Riverview Gardens School District, Normandy School District, the now-closed Wellston School District, parts of the St. Louis Public Schools, Venice Community Unit School District, and Brooklyn Community Unit School District.

Other low performing areas correspond to areas in north St. Louis County, with Jennings School District, Hazelwood School District, Ferguson-Florissant School District, and Ritenour School District. All of St. Louis city has a below average index score, with no area in the city ranking higher than 30 on the index.

There are quite a few school district areas with a school proficiency index of 90 and above. These areas generally fall in mid and west St. Louis County, and include Ladue, Brentwood, Clayton, Kirkwood, Lindbergh, Webster Groves, and Rockwood school districts. Additionally, areas with over 90 scores in Illinois include Edwardsville, Highland, Mascoutah, and most of Monroe County.

Most of the lowest performing areas correspond with unaccredited school districts. Normandy School District lost accreditation in September 2012.¹⁰⁵ Wellston School District lost accreditation status in 2003, and in 2009 the Missouri State School Board voted to dissolve the school district at the end of the 2009/2010 school year. The district was dissolved into the Normandy School District.¹⁰⁶ Riverview

Gardens School District lost state accreditation in 2007, and in 2010 the state assumed control over the school district by appointing a Special Administrative Board that governs the district.¹⁰⁷ St. Louis city has been unaccredited since 2007, but a recent vote in October 2012 gained provisional accreditation.

The issue of school performance in the St. Louis region, as in many parts of the nation, is a controversial and complex topic. The topic is much greater than what the focus or scope of this study can cover. However, the effect of schools on opportunities is an issue that is important to regional efforts to address racial inequalities.

103 FHEA Data Documentation. Page 5.

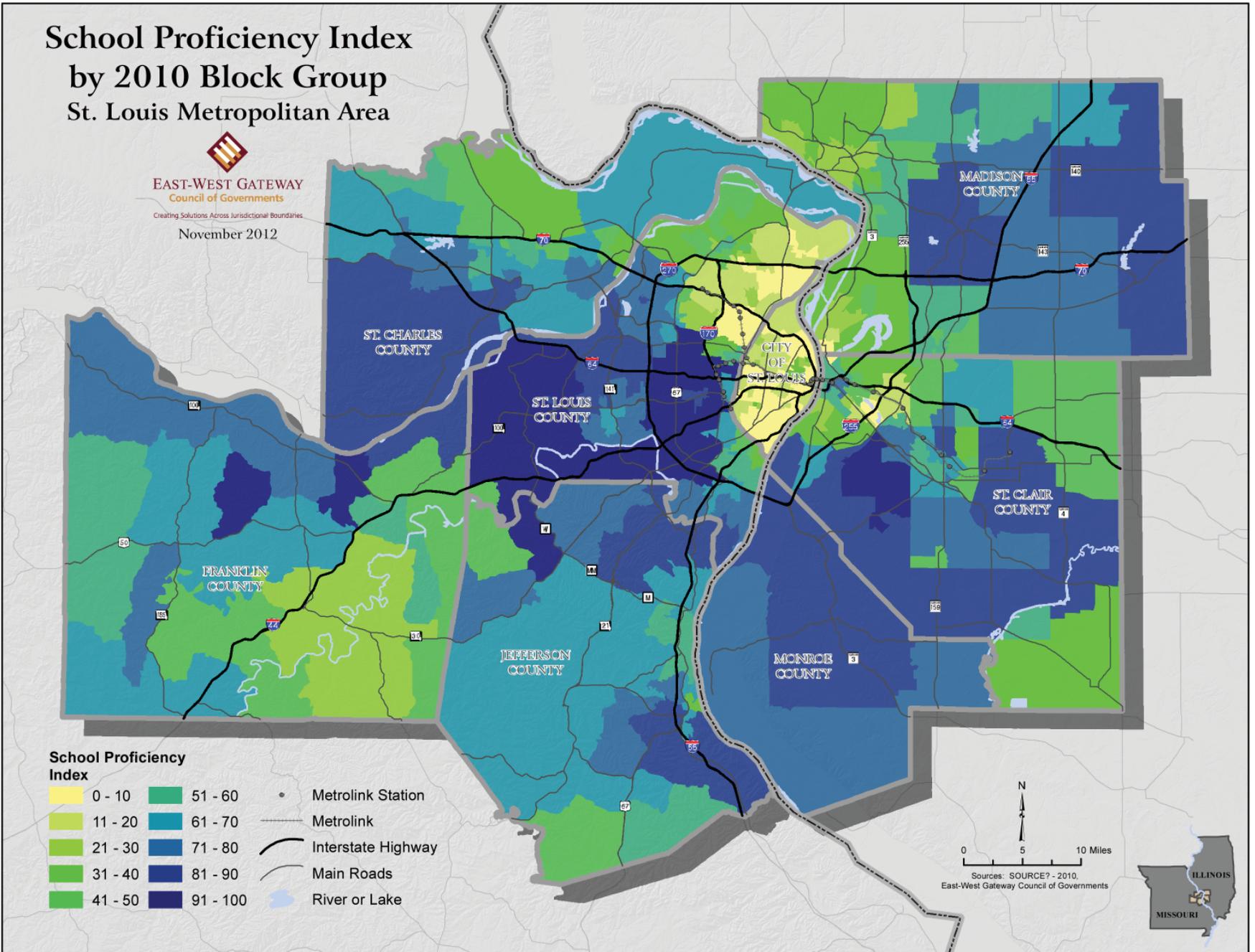
104 St. Louis Magnet Schools 2012-2013 brochure. <http://www.slps.org/cms/lib03/MO01001157/Centricity/Domain/48/SLPS%2012-13%20Final-FINAL%209-21-11-Complete.pdf> .

105 "State votes to strip Normandy schools of accreditation" St. Louis Post Dispatch. September 18, 2012. http://www.stltoday.com/news/local/education/state-votes-to-strip-normandy-schools-of-accreditation/article_d5a11724-01a4-11e2-87a5-0019bb30f31a.html .

106 "SBE Approves Closure of Wellston District," December 17, 2009, <http://dese.mo.gov/news/2009/Wellstonclosure.htm> .

107 "Special Administrative Board Named to Lead Riverview Gardens," May 20, 2010, <http://dese.mo.gov/news/2010/rgsab.htm> .

Map 19:



3. Job Access Index

The job access index measures the accessibility of a neighborhood to job locations. Distance to larger employment centers is weighted more heavily. The index uses a gravity model where accessibility of a given residential block-group is a summary description of the distance to all job locations, with the distance from any single-job location weighted to account for size of employment and labor competition of that location.¹⁰⁸ Map 20 displays the job access index.

Jobs are distributed relatively evenly around the St. Louis region. There is a pattern of fewer jobs in further outlying areas, such as Franklin County and parts of Jefferson County in Missouri, and Monroe County and the furthest east areas of Madison and St. Clair counties in Illinois.

The riverfront areas both in Missouri and Illinois show high levels of jobs, particularly around the downtown central city areas.

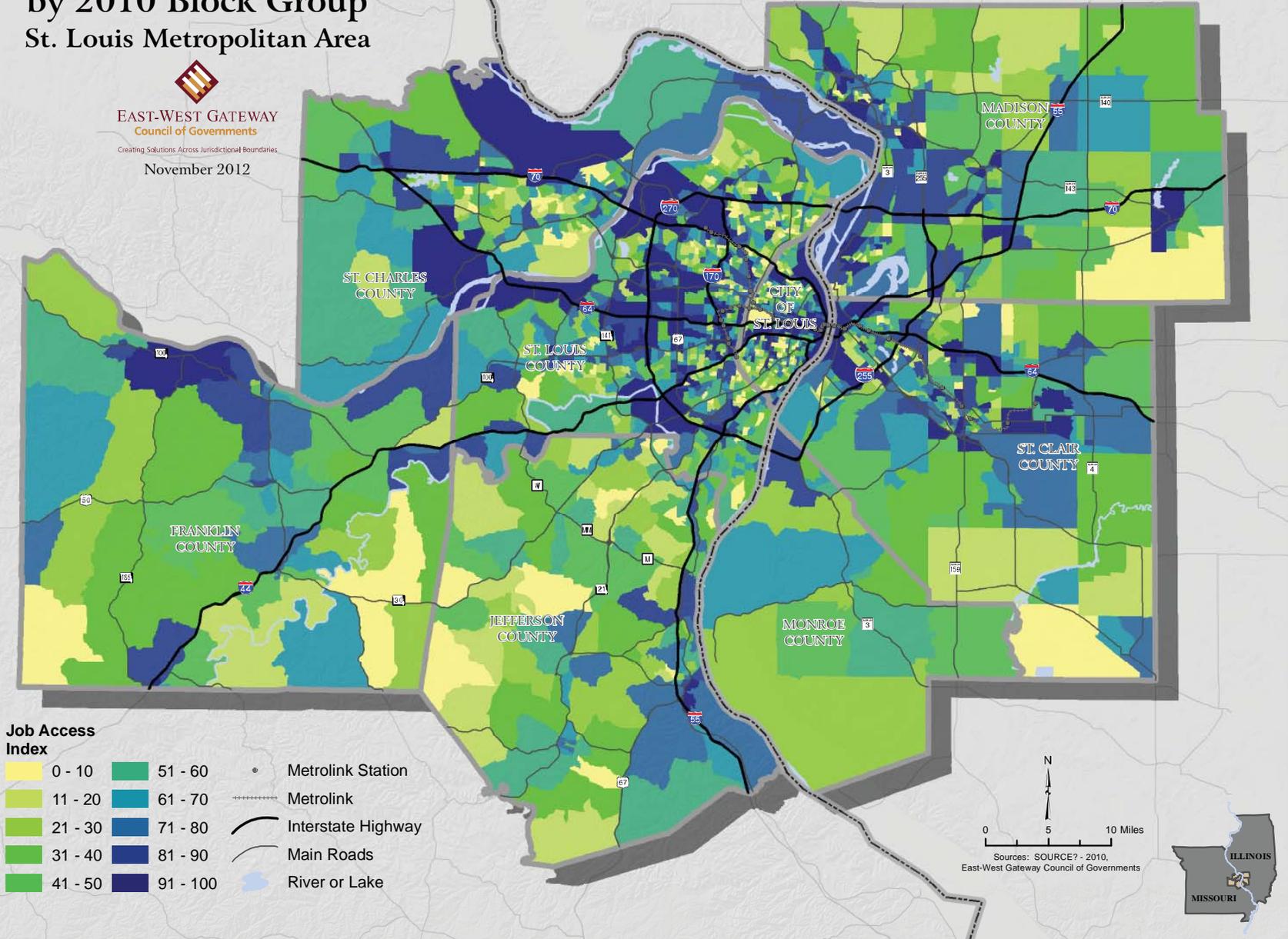
One limitation of this index is distinguishing the type of jobs available by neighborhood. The industry of each job center would indicate a difference in what type of jobs and what skill or training level is required for jobs available by neighborhood. The index also does not consider whether job locations are transit-accessible.

Map 20:

Job Access Index by 2010 Block Group St. Louis Metropolitan Area



EAST-WEST GATEWAY
Council of Governments
Creating Solutions Across Jurisdictional Boundaries.
November 2012



Job Access Index

- | | | |
|---------|----------|--------------------|
| 0 - 10 | 51 - 60 | Metrolink Station |
| 11 - 20 | 61 - 70 | Metrolink |
| 21 - 30 | 71 - 80 | Interstate Highway |
| 31 - 40 | 81 - 90 | Main Roads |
| 41 - 50 | 91 - 100 | River or Lake |

0 5 10 Miles

Sources: SOURCE? - 2010,
East-West Gateway Council of Governments

4. Labor Market Engagement Index

The labor market engagement index is a composite index that includes data regarding employment, labor force participation, and education attainment. This index is a linear combination of the unemployment rate, labor-force participation rate, and percent with bachelor's degree or higher.¹⁰⁹ Map 21 displays the labor market engagement index.

The map of the labor market engagement index shows the level of employment and education attainment across the region. The areas concentrated with higher levels of labor engagement means a high proportion of residents are employed and have higher education degrees. Areas with lower levels of labor engagement mean a higher unemployment rate and higher levels of individuals without bachelor's degrees. Visually, the map follows similar patterns seen before in the poverty index. North St. Louis, north St. Louis County, and the areas around northwest St. Clair County

have the lowest levels of labor market engagement. There are a few smaller areas with low index levels in south St. Louis city, which correspond to designated racially concentrated areas of poverty, as well as a small part of Belleville, Illinois.

The highest labor market engagement areas are concentrated in areas of west St. Louis County and St. Charles County. This includes the municipalities of Chesterfield, Creve Coeur, Town and Country, Ladue, Richmond Heights, Webster Groves, Kirkwood, in St. Louis County, as well as St. Charles, St. Peters, Weldon Spring, and Dardenne Prairie in St. Charles County. Other high areas include downtown St. Louis, and the central corridor in St. Louis city, and Edwardsville, Swansea, and O'Fallon in Illinois.

The areas with lowest labor market engagement index correspond with areas of high minority population. The exposure to opportunity indicators also demonstrates a high disparity in labor market engagement between African-Americans and whites.

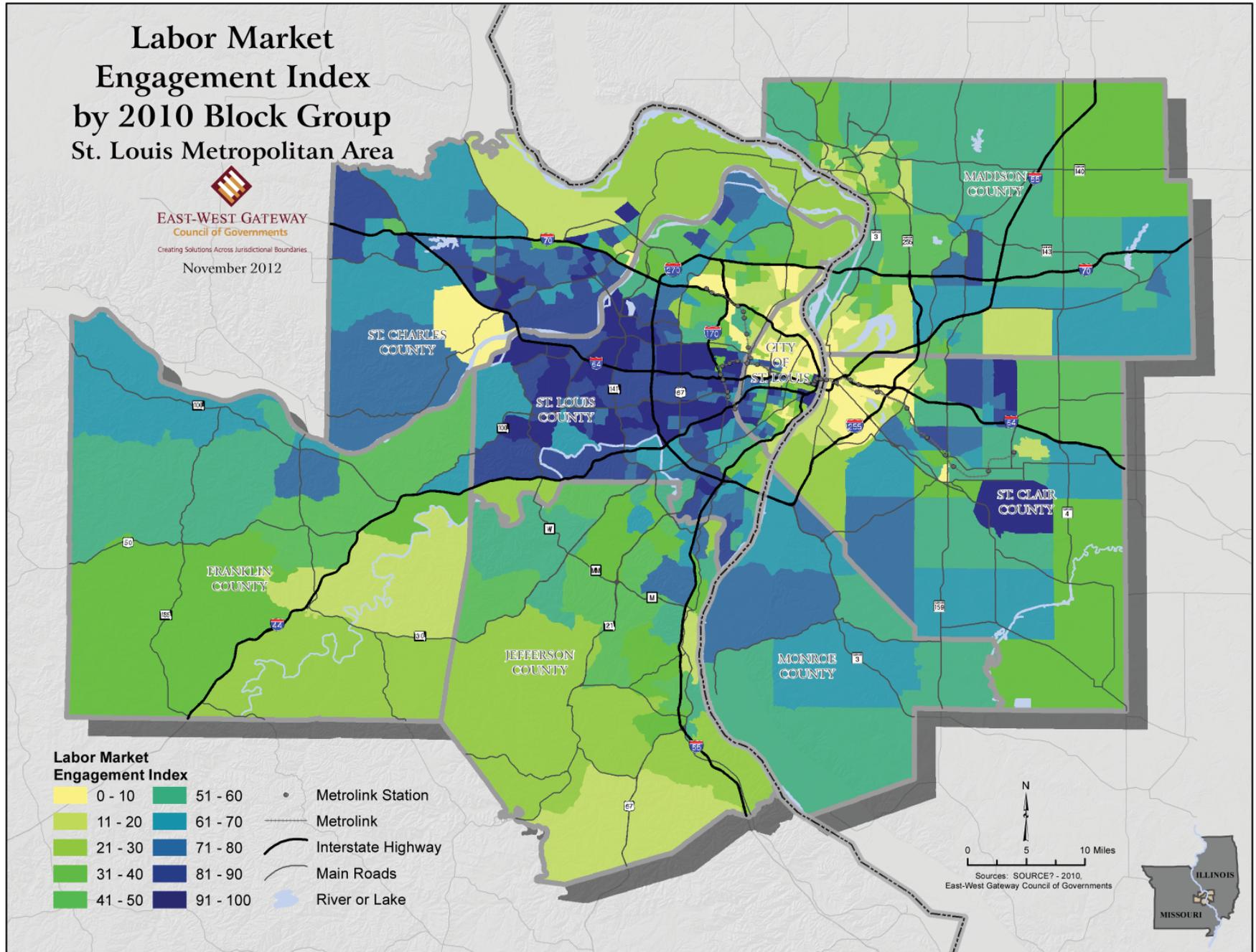
According to East-West Gateway's *Where We Stand* report from 2011,¹¹⁰ there are significant disparities in both unemployment data and in education attainment between blacks and whites. Blacks are twice as likely to be unemployed than whites in the entire St. Louis region. Among the population 25 years and older, whites are twice as likely to have a bachelor's degree or more, and 1.9 times more likely to have a high school degree than blacks in the St. Louis region.¹¹¹ These disparities, along with the findings from the labor market engagement index, demonstrate the need for job and education opportunities targeted to minorities, particularly African-Americans. Considering the job access index, which shows that jobs are fairly dispersed throughout the region, black communities need access to opportunities that translate into real employment.

109 FHEA Data Documentation page 7.

110 *Where We Stand* compared the St. Louis region with 34 peer metropolitan regions on over 100 social, economic, and physical variables.

111 East-West Gateway Council of Governments, "*Where We Stand*," 6th edition, 2011. page 63.

Map 21:



5. Transit Access Index

The transit access index demonstrates accessibility in the region by public transit via bus or trains. This data index was compiled using information from the General Transit Feed Specification (GTFS) data exchange to model accessibility to amenities like jobs in retail, arts entertainment, and food and accommodations.¹¹² Map 22 displays the transit access index.

There is a gap in transit access between the index numbers of 10 until 60. Most of the St. Louis region has extremely limited transit access, with the index under 10. Transit access starts again at an index of 60, with the highest levels of accessibility most concentrated in St. Louis city.

Jefferson, St. Charles and Franklin counties do not have any accessibility to transit. According to the HUD data set, Madison County is also not served by transit; however Madison County Transit operates a public bus transportation system that is separate from MetroBus in St. Louis.¹¹³ This is an extreme limitation of this data, and local knowledge and information from Madison County is supplemented as much as possible when exploring issues of transit access throughout the region and its impact on racial and ethnic minority communities.

An additional consideration is the number of zero-vehicle households. An estimated 85,000 households in the region do not own a vehicle. St. Louis city has the highest proportion of zero-vehicle households compared to all households, with 21.6 percent of households estimated that they didn't own a car. St. Louis County also has a large number of households without a vehicle; however they only represent 6.5 percent of households in the county.¹¹⁴

The concentration of transit accessibility in the urban core of the region with high minority population is reflected in the disparity between African-American and white persons in the exposure to opportunity indicators. Among all persons, African-Americans have a transit access of 64 and whites have a transit access of 32. Transit access generally does not extend to areas that are predominately white in the outlying communities in the St. Louis region.

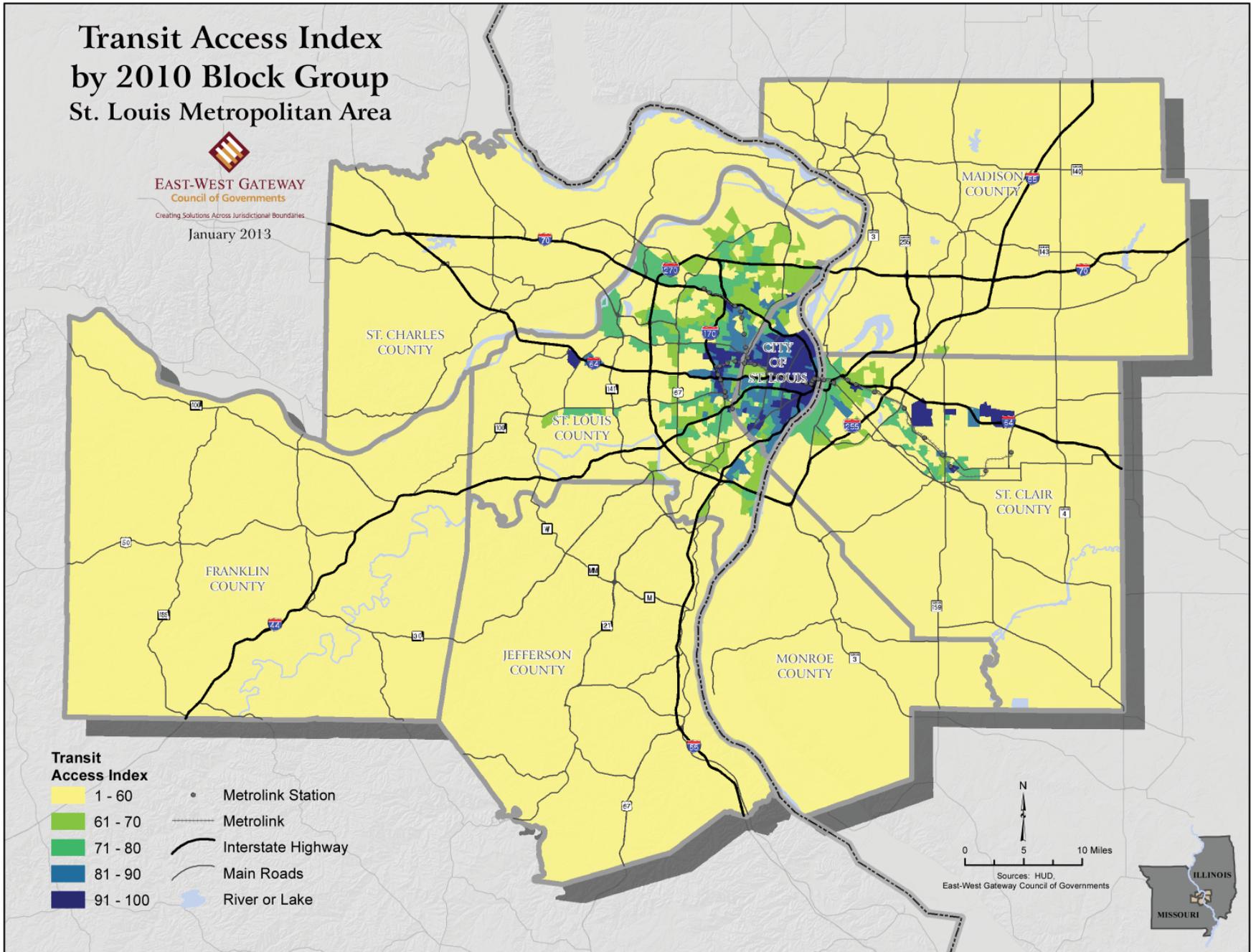
Based on the transit accessibility index, the spatial mismatch of access to transportation between low-opportunity areas and areas with high opportunity is a major concern that affects access to opportunities for minority communities.

¹¹² FHEA Data Documentation page 7.

¹¹³ Madison County Transit, <http://www.mct.org/>.

¹¹⁴ East-West Gateway, Data Center, Zero Cars in Household, <http://www.ewgateway.org/DataCenter/KeyStats/keystats.htm>, last accessed Dec. 14, 2012.

Map 22:



6. Environmental Health Hazard Exposure Index

The environmental health hazard exposure index was compiled to convey how potential exposure to harmful toxins affects neighborhoods in the St. Louis region. This data set uses information from the Environmental Protection Agency and models a function of the volume of toxic industrial releases, the toxicity assessment of the released chemicals, and the distance to the toxic release facility for a given block group.¹¹⁵

Map 23 displays the environmental health hazard exposure index. The lower index levels indicate a greater health hazard risk to toxins, while higher index levels indicate higher quality of health.

The lowest index levels are concentrated along the riverfront in the urban core around St. Louis city and Madison County. This includes areas of Venice, Granite City, and Alton, as well as East St. Louis in Illinois. Much of St. Louis city has lower index numbers, which also extend out in St. Louis County particularly within Maplewood area. Other lower levels are found in Festus and Herculaneum area in Jefferson County. A small area in Manchester in west St. Louis County also has low levels.

The areas with the highest index of environmental health are in the outlying counties in the St. Louis region furthest away from the urban core. This includes Franklin County, most of St. Charles County, and furthest east section of Madison and St. Clair counties in Illinois.

According to East-West Gateway's report *Where We Stand*, health issues related to air quality and toxins are worse in St. Louis, compared to 34 peer MSAs. On the Toxic Release Inventory, the St. Louis region ranks as number six, out of 35, in highest number of toxic releases in 2009.¹¹⁶ Additionally, these toxic hazards have an impact on health standards in St. Louis. St. Louis is ranked number one in highest asthma risk.¹¹⁷

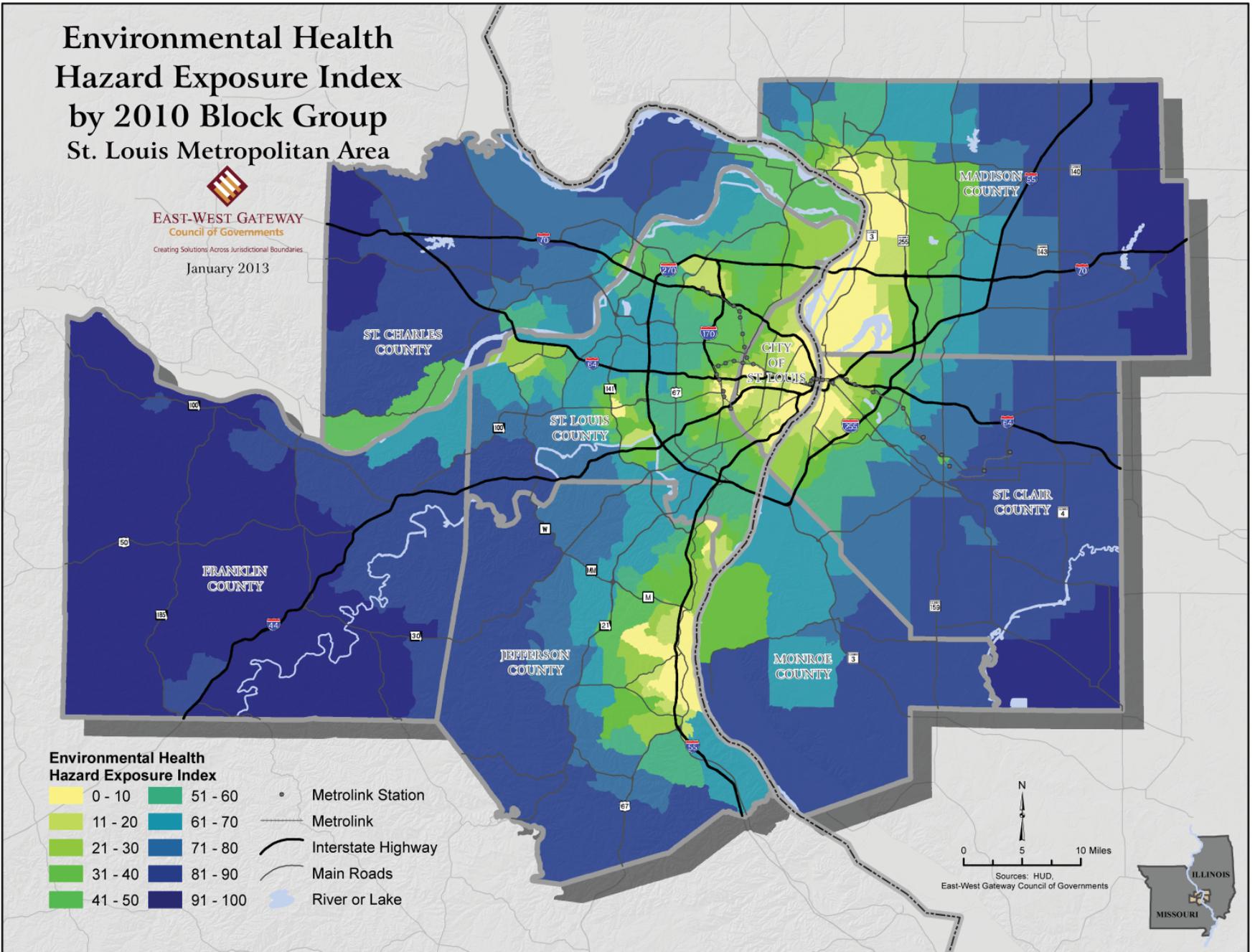
The disparities in environmental health hazards index follow patterns around the urban core and other heavy industrial areas, which is common in urban areas. However, considering the disparity in minority population distribution throughout the region and the concentration of minorities in the urban core, the health disparities disproportionately affect the predominately minority population living within the urban core.

115 FHEA Data Documentation page 7.

116 *Where We Stand*. East-West Gateway, 6th Edition, 2011, page 74.

117 *Ibid*.

Map 23:



Areas of Opportunity

Based on the aggregate opportunity indices maps for each indicator across the St. Louis region, this analysis identifies areas of opportunity. For the purpose of this study, an area of opportunity is defined as having access to better than average schools, access to jobs, access to transportation options, and low rates of poverty.¹¹⁸ In the St. Louis region, these areas generally have a majority white population.

Using the Opportunity Indices provided by HUD, census block groups that scored at or above the index for all persons in the exposure to opportunity table (Table 17) were identified. This corresponds to a poverty index at or above 56, school proficiency index at or above 56, labor market engagement at or above 57, job access at or above 51, transit access at or above 32, and a health hazards exposure at or above 60. Forty-three block groups fit this definition, all of which are in St. Louis County and St. Clair County.

The environmental health hazards exposure index limits the geography of higher opportunity to outer-ring suburbs and rural areas that are less accessible by transit and does not allow for the inclusion of inner-ring suburbs that are well above the threshold for opportunity on all other indicators. If the threshold for environmental health hazards is lowered, more inner-ring suburbs in St. Louis County are identified as areas of opportunity. Recognizing that transit in St. Louis is limited to the urban core, the exclusion of the transit access index expands areas of opportunity further west in St. Louis County, as well as in St. Charles County, Jefferson County, Monroe County, and Madison County.

By considering and weighing the need to promote increased access to areas of opportunity in places with access to public transit and places without current access, 12 areas of opportunity were identified. The purpose of identifying these areas is to paint a picture of opportunity in the region as well as to find

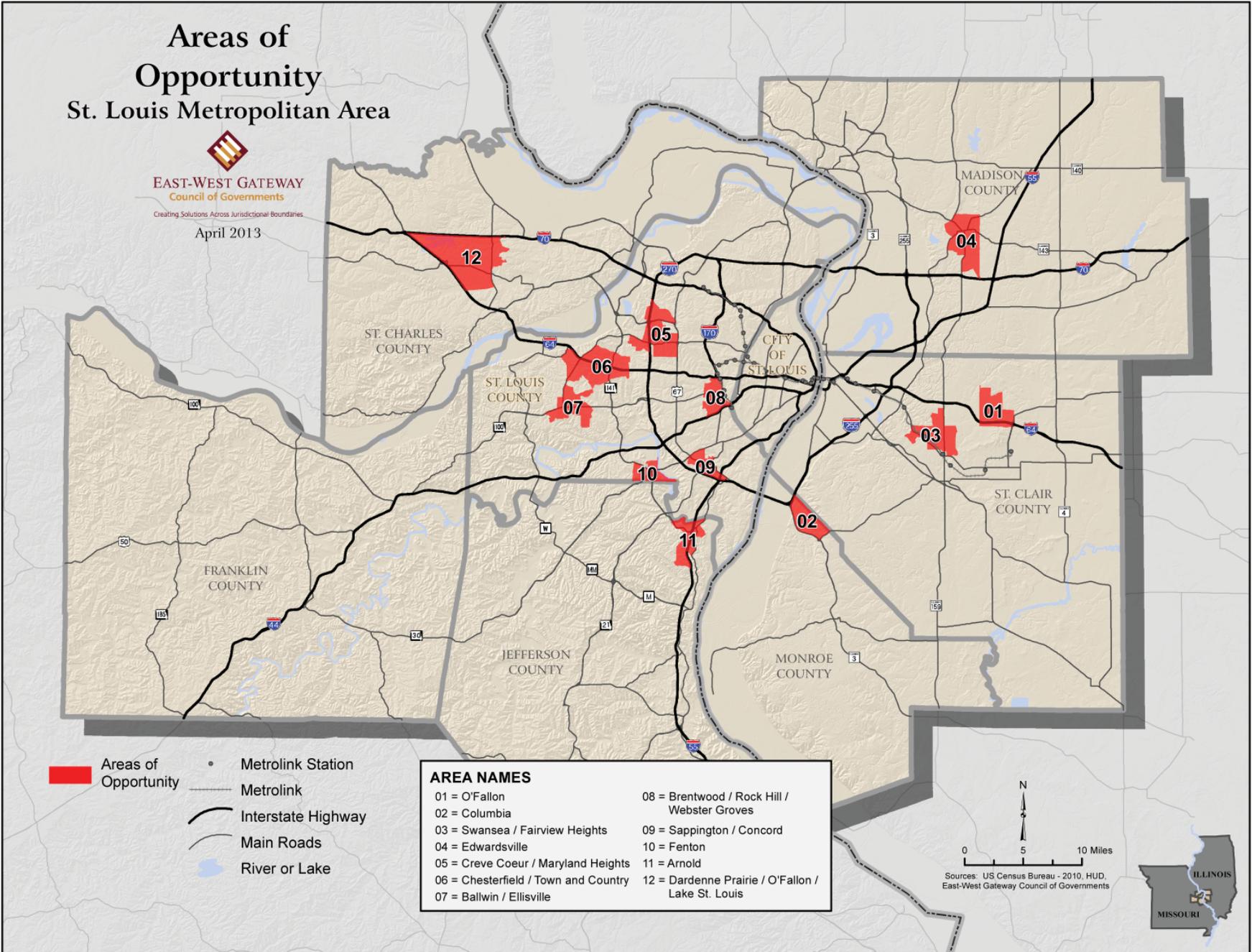
any barriers that exist in accessing opportunity in the region as a whole.¹¹⁹ These areas are not meant to be contrasted with RCAPs, although a comparison would be beneficial in understanding some of the key differences between these designated areas. The areas of opportunity were mapped out to identify the geographical locations of areas that offered a high quality of life as well as their relative accessibility.

Map 24 displays these areas. The following are descriptions of each area.

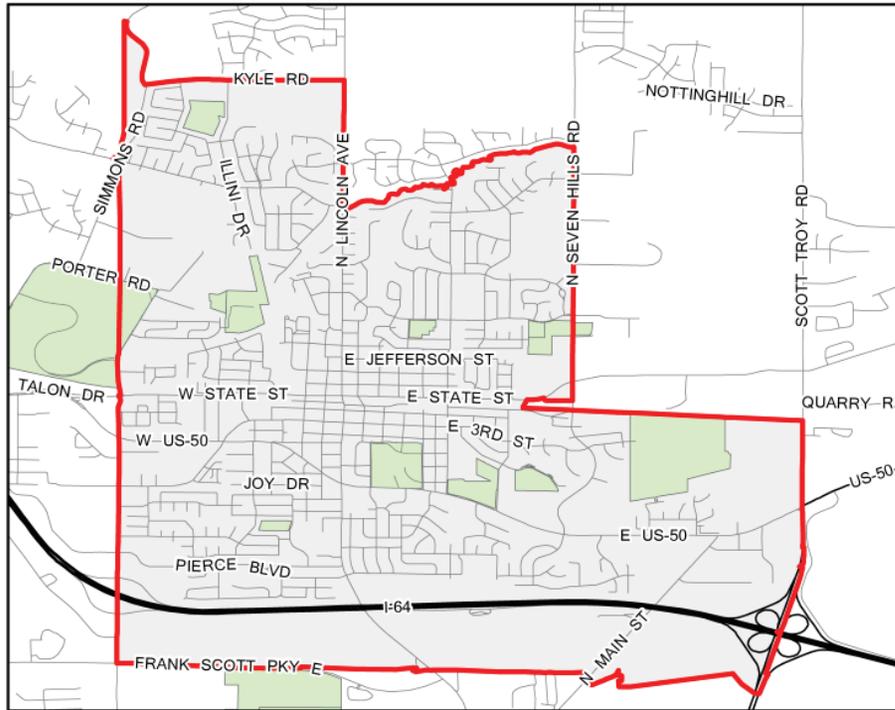
118 "Disparities in Access to Opportunity" HUD FHEA RAI webinar series. 3/12/12.

119 Ibid.

Map 24:



1. O'Fallon, IL



Location

Census Tracts (Block Groups): 504352, 504351, 504354, 504355 (1)

State/County: IL/St. Clair

City: O'Fallon

School District: O'Fallon Township High School District 203, O'Fallon Community Consolidated School District 90

South Boundary: Frank Scott Parkway, Air Mobility Drive (up until railway track)

East Boundary: Weil Road

North Boundary: Engle Creek

West Boundary: Lincoln Avenue

Description

This area scored above average on all HUD indicators. There are two full-service

supermarkets and 11 bank branches in the area. There are two school districts in the area with high ratings from GreatSchools website. O'Fallon Township High School District has a rating of 10 out of 10, while O'Fallon Community Consolidated School District has a rating of 8. The area has experienced high population growth in the past decade. With a population of over 28,000, the city is one of the biggest in the region.

The area also offers recreational facilities and a community park system. A YMCA just outside the area also offers an indoor pool and running track. There is one LIHTC and two HUD multifamily housing projects in the area. The area around O'Fallon Park is rated *very walkable* by Walkscore.com* while the remaining areas are car-dependent.

Population

Total Population	17,320
-------------------------	---------------

Race

African-American	16.7%
White	76.7%
Asian	22.6%
Other	1.3%
Hispanic	2.1%

Housing

LIHTC Units	103
Low Income Units	83
Public Housing Projects	0

Amenities and Services

Banks	12
Full-service Supermarkets	2

Sources for the Areas of Opportunity Tables (pages 84-95).

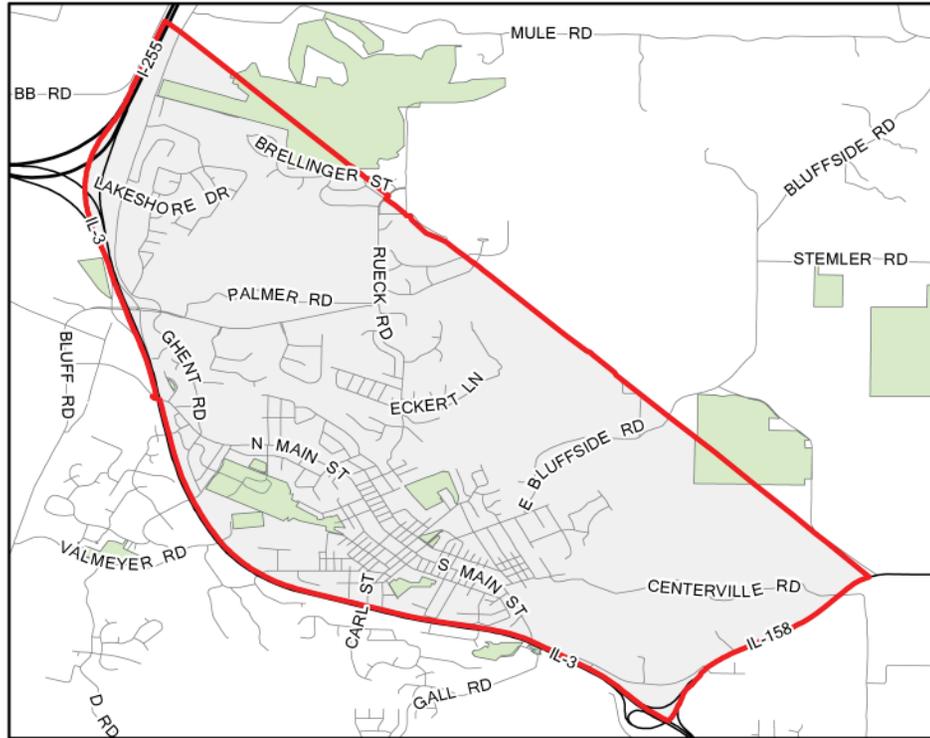
Population sources: *U.S. Census 2010*

Housing sources: *HUD and PolicyMap*

Amenities and services sources: *PolicyMap*

* Walkscore.com is a website dedicated to promoting walkable neighborhoods. It scores areas based on their walking distance to amenities.

2. Columbia, IL



Location

Census Tracts: 600101

State/County: IL/Monroe

City: Columbia

School District: Columbia Community Unit School District

South and Southeast Boundary: IL-3 and IL-158

North Boundary: the St. Clair/Monroe county borders

West Boundary: I-255

Description

There are six bank branches in the area. Metrobus provides a morning and afternoon bus service from the area to the East St. Louis MetroLink. The area school district, Columbia Community Unit School District, has a GreatSchools rating of 9 out of 10. There is a lack of affordable housing and full-service supermarkets in the area.

Population

Total Population 7,074

Race

African-American	0.4%
White	97.6%
Asian	0.6%
Other	0%
Hispanic	1.5%

Housing

LIHTC Units 0

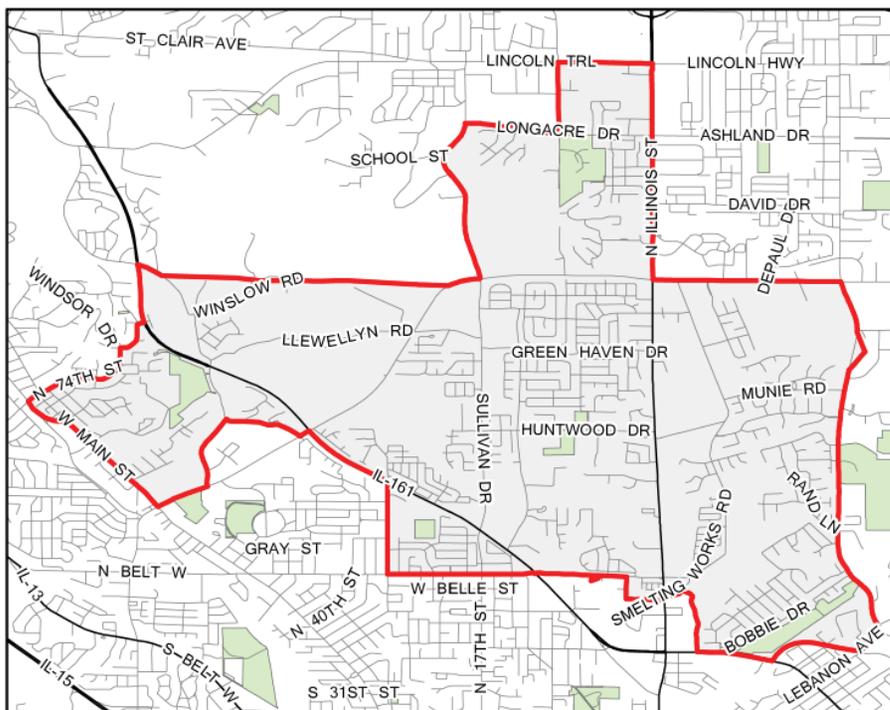
Public Housing Projects 0

Amenities and Services

Banks 6

Full-service Supermarkets 0

3. Swansea/ Fairview Heights



Location

Census Tracts (Block Groups): 501502(2), 501604(1), 503402(2), 503322, 503323(1)

State/County: IL/St. Clair

Cities: Swansea, Fairview Heights

School District: Belleville Township High School District (6), Wolf Branch School District 13, High Mount School District 116,

East Boundary: Collinsville Road (from Lebanon to Frank Scott Pkwy., N. Illinois St. (between Frank Scott Pkwy and Lincoln Hwy))

North Boundary: Frank Scott Pkwy. W. (from Lebanon to N. Illinois St.), Lincoln Tr. (from N. Illinois St. to S. Ruby Ln.), Longacre Dr. (from S. Ruby to Union Hill Rd.)

West Boundary: S. Ruby Ln. (from Lincoln Tr to Longacre Dr.), Union Hill Rd. (from Longacre Dr. to Frank Scott Pkwy. W.)

South Boundary: Mt. Pleasant Lane, IL-161 (from Frank Scott Pkwy. W. to Royal Heights Road), North Belt W., Fullerton Road, IL-161 (from east of IL-159 to railway track), railway to Lebanon Ave., Lebanon to Old Collinsville Rd.

Memorial Hospital and Swansea Community Park fall just outside this area.

Description

This area scored high on all HUD indicators except transit, which indicates that amenities are not very accessible by public transit. The Memorial Hospital MetroLink Station is within this area while the Swansea MetroLink is just south of the area. The area has 13 bank branches and one full-service supermarket. The area is very low density, with very little commercial activity. The neighborhoods south

Population

Total Population 14,116

Race

African-American	19.6%
White	75.5%
Asian	1.8%
Other	0.9%
Hispanic	2.2%

Housing

LIHTC Units 0

Public Housing Projects 0

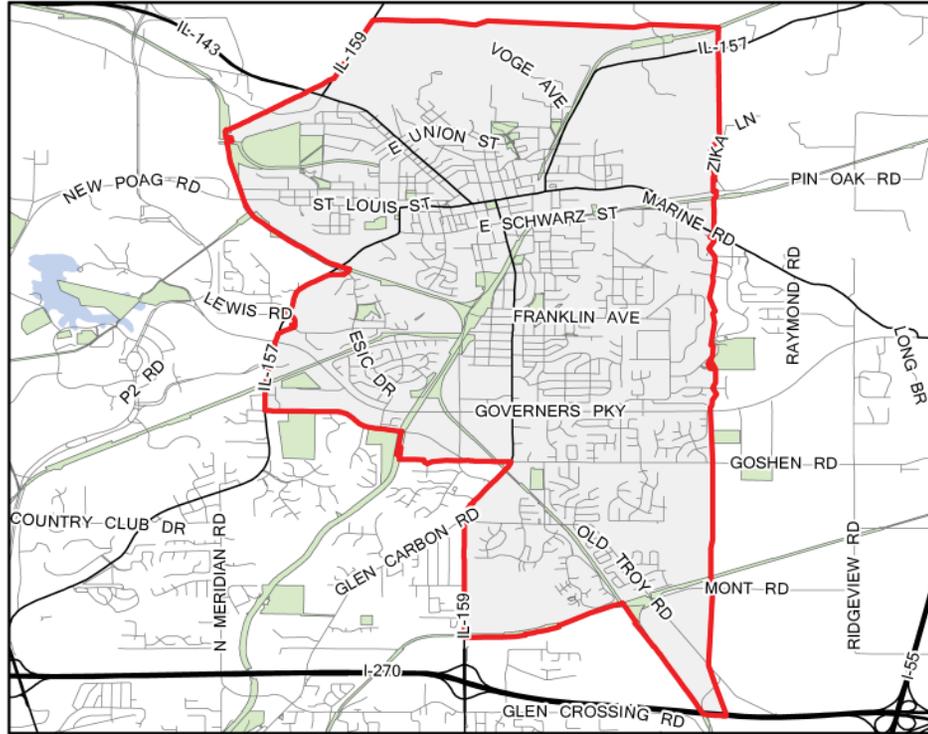
Amenities and Services

Banks 13

Full-service Supermarkets 1

of the area have more supermarkets as well as some LIHTC units. Schools in the area are part of the Belleville Township High School District, which has a GreatSchools rating of 6 out of 10.

4. Edwardsville/ Glen Carbon



Location

Census Tracts (Block Groups): 402900, 403001, 403002, 403122(1, 2)

State/County (FIPS): IL/Madison (17119)

Cities: Edwardsville, Glen Carbon

School District: Edwardsville Community School District

East Boundary: Joe Glik Park, Dunlap Lake

South Boundary: just north of I-270, Center Grove Rd. (from Troy Rd. to IL-157),

West Boundary: IL-157 (from Center Grove Rd. to W. Schwarz St.), IL-143 (from E. Dunn St. to IL-159), IL-159 (above N. Main St.)

North Boundary: Between IL-157 and St. Catherine's Village Golf Course

Description

This area scores high on all indicators except transit. The area consists of most of the town of Edwardsville and a small portion of Glen Carbon. The area has 15 bank branches and four full-service supermarkets. Southern Illinois University, Edwardsville, a major employer, is immediately to the west of the area. The Edwardsville Community School District has a GreatSchools rating of 10 out of 10. The area has high walkability scores along Troy Rd. and the center of Edwardsville, around Troy Rd. and E. Vandalia St. is considered a "walker's paradise" by Walkscore.com. There is one HUD multifamily project in the area but no HUD public housing or LIHTC projects.

Population

Total Population	37,657
-------------------------	---------------

Race

African-American	7.9%
White	87.1%
Asian	2.2%
Other	1%
Hispanic	1.8%

Housing

LIHTC Units	0
-------------	---

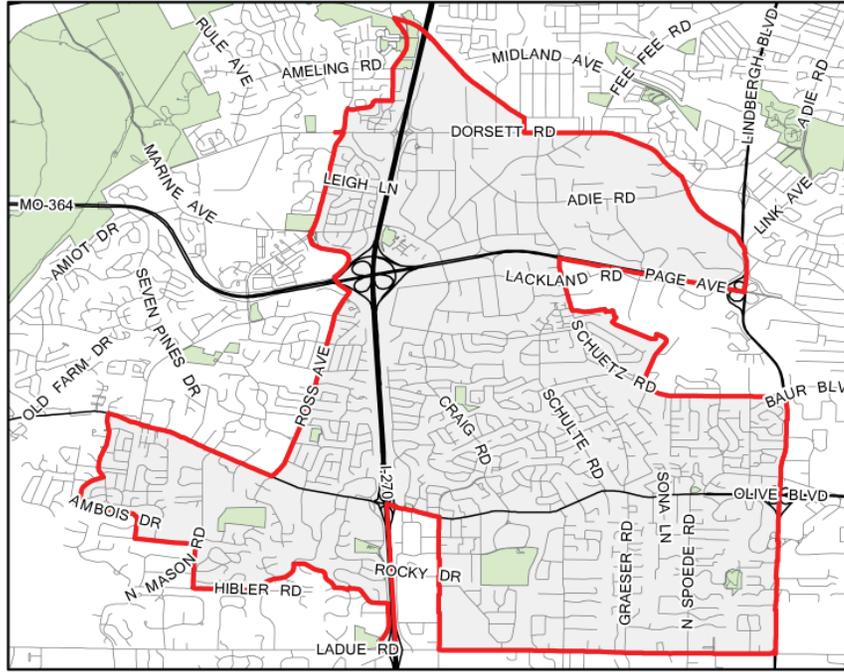
Public Housing Projects	0
-------------------------	---

Amenities and Services

Banks	17
-------	----

Full-service Supermarkets	5
---------------------------	---

5. Creve Coeur/ Maryland Heights



Location

Census Tracts (Block Groups): 213202(4), 215001, 215003, 215004(1), 215005, 215102, 215201(1), 215202(1), 215301

State/County (FIPS): MO/St. Louis (29189)

Cities: Creve Coeur, Maryland Heights

School District: Parkway School District, Ladue School District

East Boundary: Lindbergh Blvd. (from Ladue Rd. to Schuetz Rd.), Meadowside Dr., Schuetz Rd. (from Tivoli Lane to Page Ave.), Lindbergh Blvd. (from Page Ave. to Schaefer Dr.)

North Boundary: Schaefer Dr. (from Lindbergh Blvd. to Dorsett Rd.), Dorsett Rd. (until Edgeworth Ave.), railway tracks (until Mckelvey Rd.)

West Boundary: Mckelvey Rd. (down until Ameling Rd., and then from Rush Creek Way to Marine Ave.), Ross Ave. (from MO-364 to

Olive Blvd.), Olive Blvd. (until East of Fee Fee Rd.), Montmatre Dr. (down until Ambrois Dr.), Ambrois Dr. (down until Mason Manor Dr.), Mason Manor Dr. (down until N. Mason Rd.)

South Boundary: Hibler Rd., Country Glen Lane, Olive Blvd. (from I-270 to N. New Ballas Rd.), Ladue Rd. (from N. New Ballas Rd. to Lindbergh Blvd.)

Description

The area, which covers sections of Creve Coeur and Maryland Heights, scores above average on all HUD indicators. It has over 24 bank branches as well as six full-service supermarkets. No libraries are located there. Monsanto World Headquarters is partially located in the area while St. John's Mercy Medical Center is just south of the area. Both are big employers in the area. Both area school districts—Ladue and Parkway—have a GreatSchools rating of 9 out

Population

Total Population 28,731

Race

African-American	10.7%
White	73.7%
Asian	12.5%
Other	0.5%
Hispanic	2.6%

Housing

LIHTC Units 0

Public Housing Projects 0

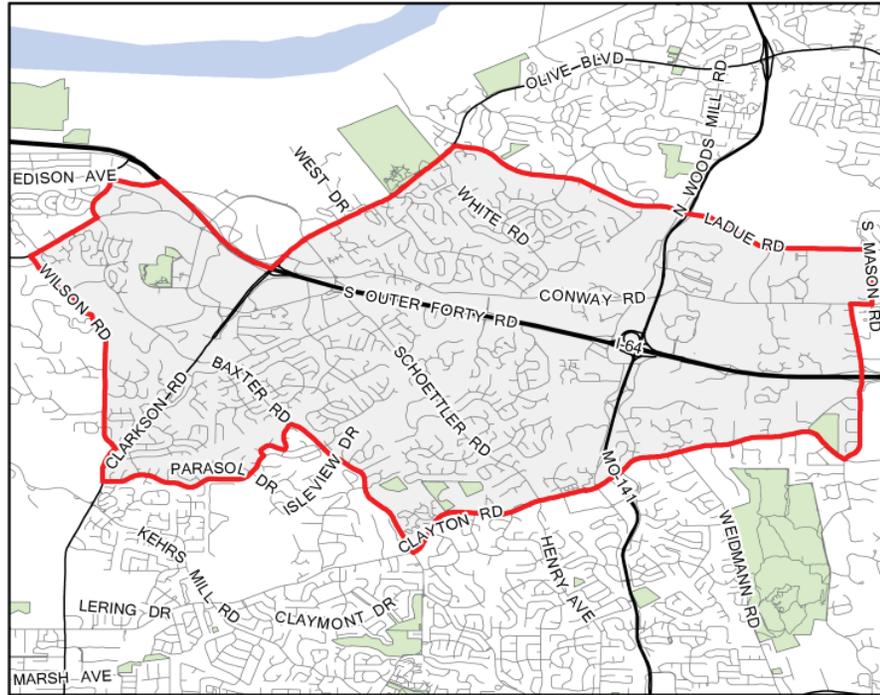
Amenities and Services

Banks 26

Full-service Supermarkets 6

of 10. Many points in this area score high on walkability. There are no LIHTC or public housing projects.

6. Chesterfield/ Town and Country



Location

Census Tracts (Block Groups): 215202(4), 215232, 217702(1), 217841, 217842, 217851, 221628(1, 3)

State/County (FIPS): MO/St. Louis County (29189)

Cities: Chesterfield, Town and Country

School District: Parkway School District

The area includes the eastern part of Chesterfield and the western part of Town and Country.

East Boundary: South Mason Rd.

North Boundary: Ladue Rd.

West Boundary: Olive Blvd., I-64 (from Olive to railway tracks), Baxter Rd., Wild Horse Creek Rd.

South Boundary: Wilson Rd., Country Ridge Dr. (until Vinerige Ln.), Country Field Drive,

Baxter Rd. (from Country Field to Clayton Rd.), Clayton Rd. to S. Mason Rd.

Description

Some block groups score above average on all HUD indicators. The area has an abundance of banking services and grocery stores. Maryville University, St. Luke's Hospital, and Logan College of Chiropractic are three main institutions in the area and possibly large employers. The area also includes Westfield Chesterfield Mall.

Except for two areas that score relatively high on walkability at the southwest corner of I-64/ Clarkson Rd. and at the intersection of Baxter Rd. and Clayton Rd., most areas in these block groups have very low walkability scores. There are no LIHTC, HUD public housing, or HUD

Population

Total Population 31,631

Race

African-American	2.6%
White	86.3%
Asian	9.1%
Other	0%
Hispanic	2.4%

Housing

LIHTC Units 0

Public Housing Projects 0

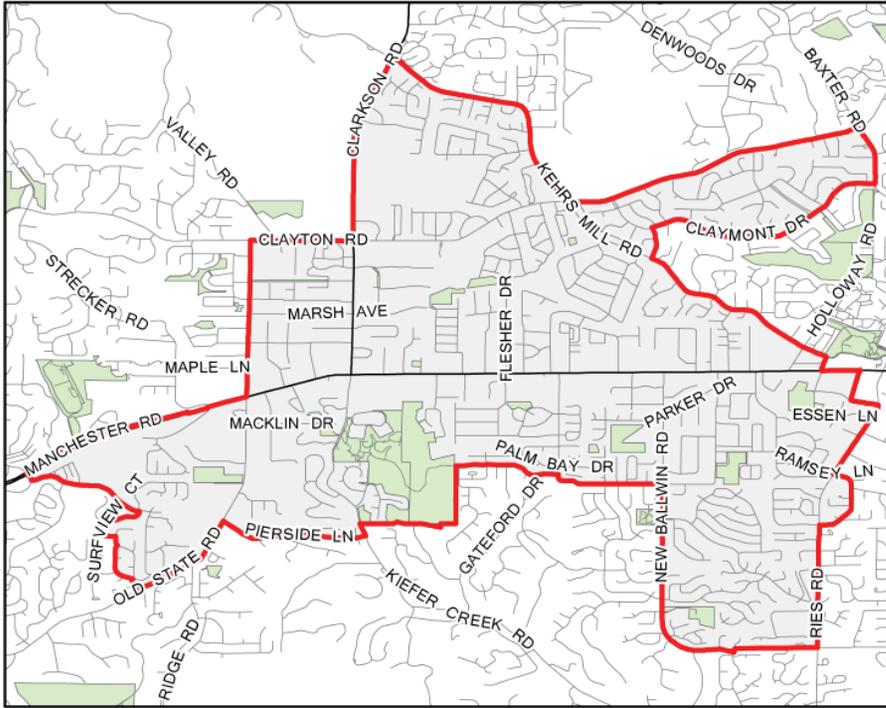
Amenities and Services

Banks 15

Full-service Supermarkets 4

multifamily units in the area. The Parkway School District, which encompasses the area, has a GreatSchools rating of 9 out of 10. The area is projected to have high residential growth.

7. Ellisville/ Ballwin



Location

Census Tracts (Block Groups): 217806, 217807(1), 217852(1), 217921(1), 217923(1, 2, 4), 217943(1, 2, 3), 221506(1)

State/County (FIPS): MO/St. Louis County (29189)

Cities: Ellisville, Ballwin

School District: Rockwood SD, Parkway SD

The area is in the municipalities of Ballwin and Ellisville.

East Boundary: Riles Rd. to Manchester Rd., Kehrs Mill Rd., Claymont Dr., Baxter Rd.

North Boundary: Clayton Rd., Kehrs Mill Rd.

West Boundary: Clarkson Rd. down until Clayton Rd., Clayton Rd. until Hutchinson Rd., Hutchinson until Manchester, Manchester until Pierside Ln.

South Boundary: Pierside Ln. until Kiester Creek Rd., Oakwood Farms Ln. until Reinke Rd., New Ballwin Rd., Big Bend Rd.

Description

The area has many banking and other commercial services, especially along Manchester and Clarkson. Most of the area is very low density. In 2009, Ellisville was ranked 29th by Money Magazine as one of the best places to live in America. The Rockwood School District, which encompasses most of this area, has a rating of 9 out of 10 from GreatSchools. There are no LIHTC, HUD public housing, or HUD multifamily housing in the area.

Population

Total Population 21,731

Race

African-American	2.5%
White	89.5%
Asian	5.2%
Other	0.2%
Hispanic	2.7%

Housing

LIHTC Units 0

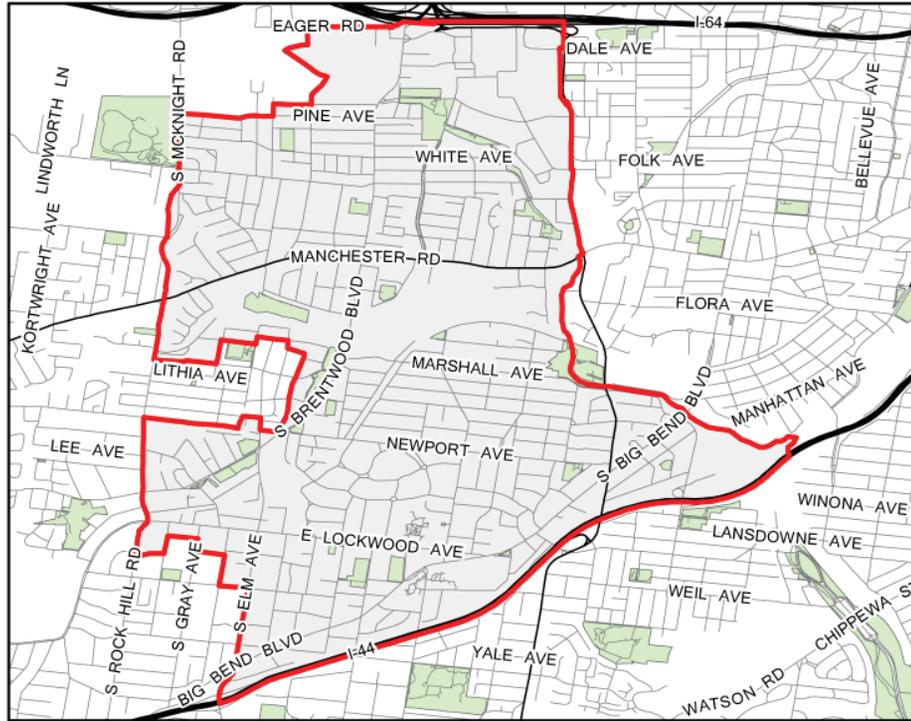
Public Housing Projects 0

Amenities and Services

Banks 15

Full-service Supermarkets 3

8. Brentwood/ Webster Groves



Location

Census Tracts (Block Groups): 217300, 217400(2, 3, 4), 218900(4, 5), 219100, 219200, 219300(1), 219500(1), 219600(1)

State/County (FIPS): MO/St. Louis County (29189)

Cities: Brentwood, Rock Hill, Webster Groves, Shrewsbury

School District: Brentwood School District, Webster Groves School District

The area includes portions of the municipalities of Brentwood and Webster Groves and to a smaller extent Rock Hill and Shrewsbury.

East Boundary: Deer Creek and S. Hanley Rd. up until I-64

North Boundary: I-64 and Eager Rd., Pine Ave.

West Boundary: South Mcknight Rd. down until Helfenstein Ave. (except for area between Ivory Crocket Park, Holland Ave., and N. Rock Hill Rd.)

South Boundary: I-44

Description

The area scores very high on all HUD indicators except for the Environmental Health Hazards Index. There is a notable banking and commercial presence in the western block groups in the area and along S. Brentwood Blvd. However, the southwest side of the area has a shortage of full-service supermarkets. The school districts in the area—Brentwood and Webster Groves—have GreatSchools ratings of 9 and 8 out of 10, respectively. With a walkability score of 50, the city of

Population

Total Population 17,768

Race

African-American	6.6%
White	87%
Asian	3.7%
Other	0.6%
Hispanic	2.2%

Housing

LIHTC Units 182

Public Housing Projects 149

Amenities and Services

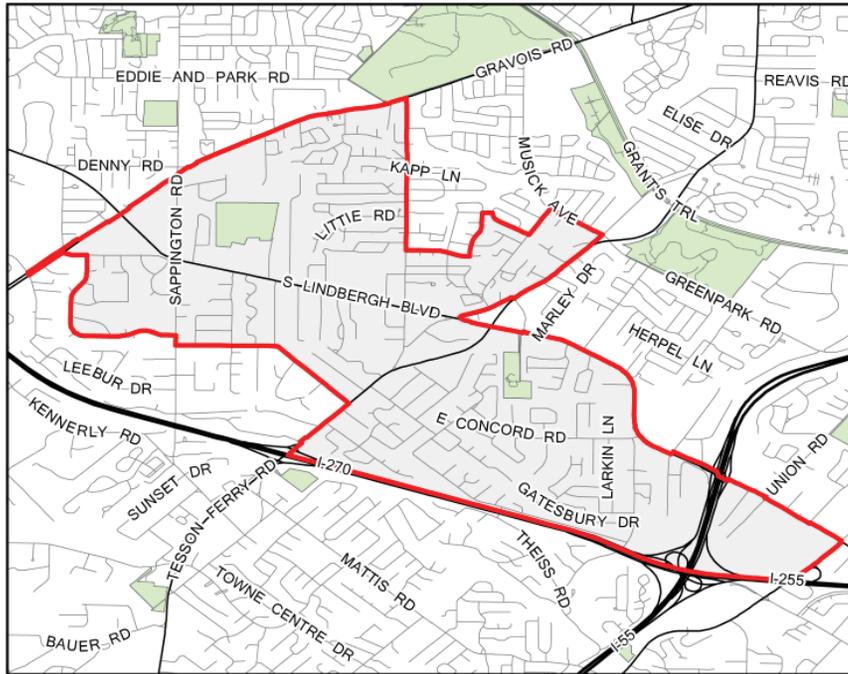
Banks 13

Full-service Supermarkets 6

Webster Groves is rated as being somewhat walkable.

There are a few LIHTC projects in the area as well as many LIHTC and HUD multifamily housing projects located immediately outside of the area in between Ivory Crocket Park, Lorraine City Park, and Barbre Park. All of the noted low-income housing units are located within the city of Webster Groves. The area is also home to Webster University, a major employer in the area as well as the Brentwood MetroLink Station. At 6.6 percent, Webster Groves has a higher percentage of African-Americans than most other areas of opportunity in the region.

9. Sappington/Concord



Location

Census Tracts (Block Groups): 220702(3), 220703, 221301(1, 2), 221202(1)

State/County (FIPS): MO/St. Louis County (29189)

Cities: Sappington, Concord, Green Park

School District: Lindbergh Schools

The area is within the city limits of Sappington, Concord, and Green Park.

East Boundary: Lindbergh Blvd. (from Lemay Ferry Rd. to Tesson Ferry Rd.), Tesson Ferry Rd. to Greenpark Rd., Baptist Church Rd. (from Three Courts Dr. to Gravois Rd.)

North Boundary: Gravois Rd. (from Baptist Church Rd. to Sappington Barracks Rd.)

West Boundary: Crestwick Dr., Doverhill Dr., Concord School Rd., Tesson Ferry Rd. (from Concord School Rd. to I-270)

South Boundary: I-270 (south of Tesson Ferry Rd.), I-255 to Lemay Ferry Rd.

Description

All three municipalities in the area have very low diversity, with a significant portion of the population being white. The percentage of African-Americans in the cities is less than 1.5 percent. The area has a very low population density and most residential units are single-family. There are no LIHTC, HUD multifamily, or HUD public housing in the area. A main benefit of the area is accessibility of banks and full-service supermarkets. The area's school district, Lindbergh, has a GreatSchools rating of 9 out of 10.

Population

Total Population 9,621

Race

African-American	1.2%
White	94.7%
Asian	1.8%
Other	0.7%
Hispanic	1.6%

Housing

LIHTC Units 0

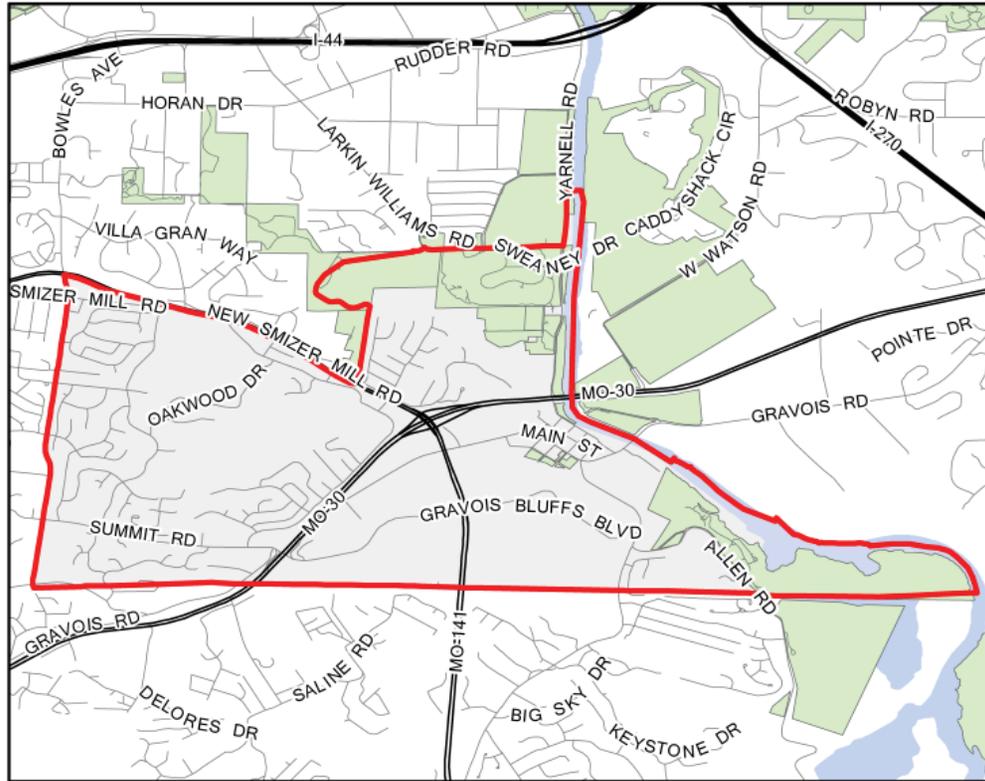
Public Housing Projects 0

Amenities and Services

Banks 15

Full-service Supermarkets 4

10. Fenton



Location

Census Tracts (Block Groups): 221423(2), 221424

State/County (FIPS): MO/St. Louis County (29189)

Cities: Fenton

School District: Lindbergh Schools

East Boundary: Meramec River

North Boundary: Fenton City Park, MO-141 (from Sennawood Dr. to Bowles Ave.)

West Boundary: Bowles Ave. down to Hawkins Rd.

South Boundary: Jefferson County boundary

Description

The block group 221423.2, which borders the Meramec River, scored above average on all HUD indicators. Most points in the area have easy access to grocery, retail, and banking services, most of which are situated along Gravois Rd. The only exception is the area outside Fenton city limits to the west. Lindbergh School District has a GreatSchools rating of 9 out of 10. A St. Louis County library is also located in the area.

There are no LIHTC, HUD multifamily, or HUD public housing in the area.

Population

Total Population 6,093

Race

African-American	0.6%
White	95.1%
Asian	2.5%
Other	0.2%
Hispanic	1.6%

Housing

LIHTC Units 0

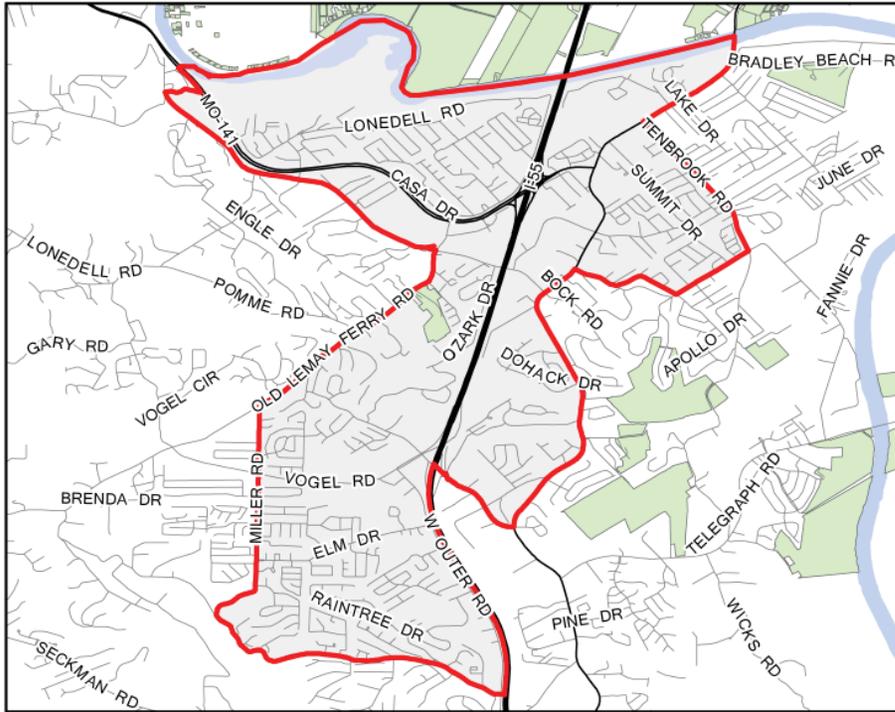
Public Housing Projects 0

Amenities and Services

Banks 7

Full-service Supermarkets 4

11. Arnold



Location

Census Tracts (Block Groups): 700110(1, 2), 700117, 700118(1, 2, 3)

State/County (FIPS): MO/Jefferson County (29099)

Cities: Arnold

School District: Fox c-6 SD

East Boundary: I-55 from Black Creek up to Richardson Blvd. to Jeffco Blvd. to Willow Dr. to Arnold Tenbrook Rd. to Tenbrook Rd. to Jeffco Blvd.

North Boundary: St. Louis County border

West Boundary: Missouri State Rd. down to Old Lemay Ferry Rd. to Miller Rd.

South Boundary: Miller Rd. to I-55

Description

The area scored high on most HUD indicators except for Transit and Environmental Health Hazard Indices. Most of the area falls within the Arnold city limits. With a population of over 20,000, Arnold is the biggest city in Jefferson County. The area school district, Fox C-6 SD has a GreatSchools rating of 8 out of 10. Most points in the area have access to full-service supermarkets and banks as well as other retail services. Most sections of the area to the east of I-55 are *very walkable*, according to Walkscore.com. However, many sections on the east of I-55 score low on walkability. In 2008 Money Magazine rated Arnold the 12th best and most affordable city to live in the U.S.

Population

Total Population 16,399

Race

African-American	0.6%
White	96.7%
Asian	0.9%
Other	0%
Hispanic	2.1%

Housing

LIHTC Units 48

Public Housing Projects 0

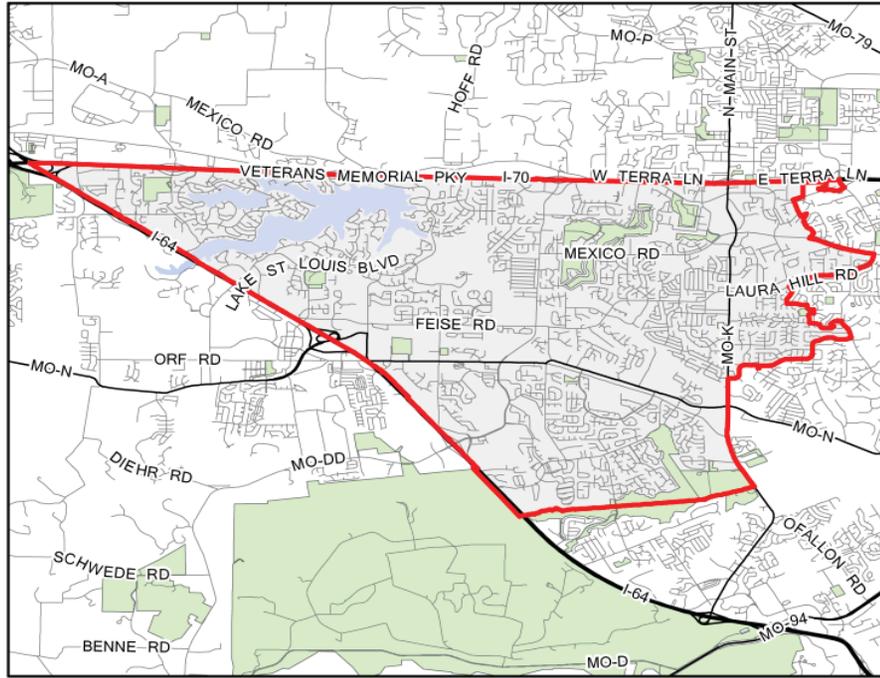
Amenities and Services

Banks 11

Full-service Supermarkets 5

There are no HUD multifamily or public housing projects in the area. There is one LIHTC project (1 unit) in the area and two others immediately outside the area. All LIHTC projects are outside Arnold's city boundaries.

12. Lake St. Louis/ Dardenne Prairie/ O'Fallon



Location

Census Tracts (Block Groups): 311152, 311153, 311154, 311712, 311722, 311732, 311733, 311734(2), 311735(1), 311903, 311904, 311907, 311909

State/County (FIPS): MO/St. Charles County (29183)

Cities: Lake St. Louis, Dardenne Prairie, O'Fallon

School District: Wentzville R-IV SD, Ft. Zumwalt R-II SD

East Boundary: MO-K from O'Fallon Sports Park to O'Fallon Pkwy. to Legacy Point Dr. to Knaust Rd. to Calumet Ranch Tri. to Surrey Trail Dr. to Butternut Stage Dr. to Laura Hill Rd. to Knaust Rd. to Mexico Rd., then up Whispering Windsong Dr. to Veterans Memorial Pkwy. to Belleau Creek Rd. up to I-70

Northern Boundary: I-70 from Belleau Creek Rd. going west to I-64

Southwest Boundary: I-64

Description

The area scores high on all HUD indicators except for the Transit Index. The two high school districts in the area, Wentzville R-IV SD and Zumwalt R-II SD, have GreatSchools ratings of 8 and 7 respectively. There are a number of HUD multifamily and LIHTC projects in the area, but no public housing. There is an abundance of bank branches in the area, especially along MO-K.

The area scores very low on walkability, except along MO-K. The low walkability of the area is also evident in the fact that there are no full-service supermarkets close to the middle

Population

Total Population	66,783
-------------------------	---------------

Race

African-American	3.9%
White	90.7%
Asian	2.8%
Other	0.3%
Hispanic	2.3%

Housing

LIHTC Units	11
Low Income Units	11
Public Housing Projects	0

Amenities and Services

Banks	21
Full-service Supermarkets	9

section of the area as well as the section west of Lake St. Louis. The city of Lake St. Louis has a population of over 14,000 while Dardenne Prairie and O'Fallon's populations are over 11,500 and 79,000 respectively. All three municipalities have a white population that is between 90 and 92 percent of the total population. Also, the largest minority group in both municipalities is African-Americans, with 3-4 percent of the population.



5

Fair Housing Enforcement Infrastructure

Despite the protections against discrimination through federal civil rights laws and statutes, illegal housing discrimination still exists across the country and in the St. Louis region. The impact of discrimination, both systemic and individual instances, is that individuals or families are treated less favorably and/or are restricted in accessing housing because of their membership in a protected class. However, there are agencies and organizations working to prevent illegal discrimination. Their efforts have helped increase access to housing.

This section will examine the levels and types of discrimination that occur in the St. Louis region, and the capacity of the entities in the area to respond appropriately.

Systemic Discrimination

Systemic fair housing issues are patterns, practices or policies where alleged discrimination has a broad, long-term impact on a group, industry, or geographic area. The systemic issues detailed below include cases

of discrimination, as well as systemic practices that have occurred or are continuing to occur.

Racial Steering

In 1996 the city of Florissant worked with the Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) to investigate racial steering by real estate agents in north St. Louis County. The city had been receiving complaints of racial steering. EHOC's investigation showed evidence of racial steering in five real estate agencies out of six that were investigated. In 1997, EHOC did a follow-up investigation of those five real estate agencies and found evidence of discriminatory racial steering in two Gundaker Real Estate agencies where African-Americans were steered to certain areas in Florissant and north St. Louis County because of their race. EHOC and the city of Florissant filed a lawsuit against Gundaker Real Estate Company in May 1998 in US District Court.¹²⁰ There were issues found in the investigation methods used by EHOC during the tests, and Judge Stephen Limbaugh dismissed the

evidence and the expert witnesses. The case settled in 2001 outside of court for \$20,000. Regardless of the outcome of the case and the relatively low penalty for systemic discrimination issues, the issue of racial steering was documented and challenged.

Anti-Immigration Ordinances

In July 2006, Valley Park, a municipality in south St. Louis County, passed two local ordinances that prohibited landlords and employers from providing housing or hiring undocumented immigrants, penalized by fines. EHOC and a coalition of landlords filed a lawsuit against the ordinances for national origin discrimination. The suit, *Reynolds v. City of Valley Park, MO*, was filed in state court.¹²¹ On March 12, 2007, the St. Louis Circuit Court issued permanent injunctions against the ordinances citing that the penalties under the ordinances violate and are not authorized by state statute Mo.R § 79.470, and thus made the ordinances ineffectual and unenforceable.

Despite the case against Valley Park, many municipalities in St. Louis County have restrictive anti-immigration policies that make it difficult for immigrants to access housing and other services.

Currently, some municipalities require state-issued photo ID for occupancy permits. These policies are documented in municipalities in written policies and requirements. Other municipalities do not have a written policy regarding photo IDs, but their practice is to only provide occupancy permits for those with state-issued photo IDs. The issue with only accepting state-issued IDs is that it is restrictive to immigrants, including legal immigrants that might not have state-issued IDs. The photo-ID requirement has a disparate impact on immigrant and foreign-born households and restricts their access to housing.

¹²⁰ EHOC v. Gundaker, 130 F.Supp.2d 1074 (E.D. Mo. 2001).

¹²¹ Reynolds v. City of Valley Park, Missouri, American Civil Liberties Union, <http://www.aclu.org/immigrants-rights/reynolds-v-city-valley-park-missouri> .

Redlining Cases

Recently, a number of systemic fair housing cases have been filed in the St. Louis region alleging lending discrimination on the basis of race and national origin. All of these cases were redlining cases, where the financial institutions were failing to provide the same level of financial services to predominately minority communities. HUD and the Department of Justice were both involved in resolving these cases. These cases all originated from the work of the St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) in holding banks accountable to fair lending laws and Community Reinvestment Act (CRA) obligations.¹²² The CRA is a regulation that encourages depository institutions to meet the credit needs of all parts of the community they serve, particularly

low- and moderate-income communities.¹²³

United States v. Midwest BankCentre involved allegations of discrimination based upon race and color. The complaint was originated by a referral from EHOc. EHOc's investigation revealed that Midwest BankCentre had not originated a single loan to an African-American borrower in the five years prior. Additionally, none of the bank's branch locations were in an area with a significant African-American population and the banks' assessment area—the service area defined by the bank—was drawn in a manner to exclude parts of St. Louis city and St. Louis County. EHOc had testing evidence that showed a difference in treatment based on race.

In June 2011, the Department of Justice reached a settlement with Midwest BankCentre in which the bank will invest \$1.45 million in predominately African-American areas of St. Louis.¹²⁴ As part of the settlement, the bank agreed to open a branch in a predominately minority community, which was opened in November 2012 in Pagedale in partnership with a Beyond Housing senior living community.

In November 2009, EHOc filed a fair housing complaint against First National Bank of St. Louis and Central Banccompany alleging discrimination on the basis of race and national origin. The complaint was filed with the U.S. Department of Housing and Urban Development and their Systemic Investigations division. EHOc filed the complaint based on First National Bank's extremely limited lending to African-American borrowers and Hispanic borrowers, branch locations in all predominately white areas, and an assessment area that was drawn to exclude all of St. Louis city, north St. Louis County, and northwest

section of St. Clair County. In December 2010, the case was settled through a conciliation agreement in which the bank agreed to commit \$2.75 million in relief over the next three years.¹²⁵ The bank agreed to open a branch in a predominately minority census tract, which was opened in March 2012 in Ferguson.

In April 2010, EHOc filed a fair housing complaint with HUD against Enterprise Bank and Trust alleging discrimination on the basis of race and national origin. The complaint was based on extremely limited lending to African-American borrowers and Hispanic borrowers, branch locations in all predominately white areas, and assessment areas that excluded predominately minority areas in both St. Louis and Kansas City. Additionally, the complaint alleged that Enterprise Bank and Trust was failing to affirmatively further fair housing as a recipient of federal funds through the Troubled Asset Relief Program (TARP). In October 2011, Enterprise Bank and Trust committed \$3.1 million

122 For more information about SLEHCRA, see www.slehcra.org.

123 "Community Reinvestment Act" Federal Financial Institution Examination Council, www.ffiec.gov/cra/default.htm.

124 "Justice Department Reaches Settlement with Midwest BankCentre Regarding Alleged Lending Discrimination in St. Louis" U.S. Department of Justice, June 16, 2011, <http://www.justice.gov/opa/pr/2011/June/11-crt-784.html>.

125 "HUD, First National Bank of St. Louis Reach Agreement to Increase Investment in Low-Income and Minority Communities" U.S. Department of Housing and Urban Development, December 21, 2010. http://portal.hud.gov/hudportal/HUD?src=/press/press_releases_media_advisories/2010/HUDNo.10-268.

in increasing banking services and investments in low-income and minority communities in the St. Louis region as well as in the Kansas City metro area and in Phoenix, AZ.¹²⁶

“Crime-Free Housing”

Many cities in the Metro East have so-called “crime free housing” ordinances that require landlords to attend a training, perform criminal background checks, and include “crime free addenda” to their leases that make crimes committed on the property lease violations.¹²⁷ Granite City’s ordinance is more strict than most in that it requires landlords to evict tenants after being charged with a felony or after a certain number of misdemeanor violations, regardless of whether the tenant is convicted or whether the violations have occurred on the property or not. Belleville is also in the process of drafting a crime free housing ordinance which could potentially create concerns similar to the ordinances in Granite City and other cities.¹²⁸

While the goal of reducing crime is a legitimate purpose, these types of ordinances pose a number of potential problems. For one, they impose a general financial and administrative burden on landlords that can depress the rental market throughout a community. Second, the idea that landlords should only accept the “right type” of tenant conflicts to some extent with the idea that landlords should be inclusive. There is the risk that some landlords may begin to use race or other protected classes to determine who is the “right type” of tenant. Third, the iron clad language of the crime free statutes can conflict with housing discrimination laws in cases where a reasonable accommodation is requested or in cases of domestic violence. The idea of “zero tolerance” is wholly incompatible with the Fair Housing Act’s requirement that certain violations be reasonably accommodated. Fourth, the crime free ordinances can be used to make it impossible for persons convicted of a crime to obtain housing anywhere in the city. In addition to the

difficulties this creates for rehabilitation and reentry, this can create due process issues and potentially have a disparate impact on protected populations. Finally, in some cases, municipalities have used the enhanced enforcement tools created by crime free ordinances to target minority and/or impoverished neighborhoods.

Occupancy Inspections and Code Enforcement

In 2002, the city of Belleville was subject to complaints regarding their overly-aggressive enforcement of occupancy permits, including warrantless raids of rented property where they believed that persons who were not on the occupancy permit were living on the property.¹²⁹ The Belleville News Democrat did an investigation, which was brought to the attention of EHO and the Department of Justice.¹³⁰ EHO received complaints from about 13 people. Although the city has ceased the warrantless searches after pressure from the Department of Justice, this is still a problematic area.

In June 2012, there was a bureaucratic dispute between the chief of police and the city attorney regarding the enforcement of the occupancy regulations. A judge ruled that the occupancy statute was too vaguely worded to support bringing violations in a specific case where a person remained on the occupancy permit after vacating the residence. The police department issued a memorandum to officers to stop writing violations when a person fails to be listed on the occupancy permit, but then rescinded the memorandum and officers continue to enforce those types of occupancy violations.¹³¹

126 Conciliation Agreement, Metropolitan St. Louis Equal Housing Opportunity Council and Enterprise Bank and Trust, FHEO case number: 07-10-0755-8, <http://portal.hud.gov/hudportal/documents/huddoc?id=11-metrostlouisconcil.pdf> .

127 “Cities taking more interest in rental property,” Suburban Journal, 2/18/09, <http://westgrandplace.com/pdfs/Cities Taking More Interest In Rental Property 2-18-09.pdf> .

128 “Belleville landlords, aldermen, residents work on crime-free housing ordinance,” Belleville News Democrat, 8/22/12, <http://www.bnd.com/2012/08/22/2292435/belleville-crime-free-ordinance.html> .

129 “Subject to inspection...” Belleville News Democrat, 12/11/02, http://www.citizenreviewonline.org/Dec_2002/subject.htm .

130 “No warrant needed for inspection” Belleville News Democrat, 12/10/02, http://www.propertyrightsresearch.org/no_warrant_needed_for_inspection.htm .

131 Belleville Police send, rescind memo on enforcing city’s occupancy code. Belleville News Democrat., 06/20/12, <http://www.bnd.com/2012/06/20/2218590/belleville-police-send-rescind.html> .

Compliance with Affirmatively Furthering Fair Housing

Recipients of federal funding under the Community Development Block Grant funding (CDBG) from HUD must show that they are affirmatively furthering fair housing. Part of this requirement is to conduct a study every three to five years that examines barriers to fair housing in the jurisdiction. This study is called the Analysis to Impediments of Fair Housing (AI), which is to be used by the jurisdiction in their consolidated plan and annual action plans in order to direct planning and actions that will address those barriers.¹³²

Nationally, the enforcement of affirmatively furthering fair housing obligations has increased in recent years.

The landmark case against Westchester County, NY as well as other HUD complaints and lawsuits against entitlement jurisdictions shows signs of a renewed enforcement by HUD to monitor and enforce the provision to affirmatively further fair housing by grantees and sub-grantees.¹³³

In the St. Louis region, HUD and other community organizations are increasing oversight of entitlement jurisdictions' affirmatively furthering fair housing activities. The regional HUD office is conducting reviews of jurisdiction's AI studies.¹³⁴

Some jurisdictions have received concern letters from the U.S. Department of Housing and Urban Development (HUD) regarding their analysis of impediments and their efforts to affirmatively further fair housing through CDBG funds. A city in Illinois has been cited by HUD for concerns based on issues with the city's retro-active zoning for all single-family with additional minimum lot size requirements, as well as the issue of occupancy permits

and code enforcement. A county in Missouri received a notice of noncompliance from HUD in 2009 regarding issues with their current analysis of impediments, as well as their activities of affirmatively furthering fair housing. The county was cited for a nominal analysis of impediments that addressed significant barriers to fair housing. The county also failed to show adequate funding of activities that addressed the impediments.¹³⁵

Reports of Discrimination

In addition to systemic discrimination issues, in which the discrimination is a pattern or practice that has a broad and historical impact, there are many individual cases of discrimination from the St. Louis region. It is estimated that only a small number of instances of discrimination get reported and investigated as a complaint, so these statistics represent a small picture of the level and extent that discrimination still exists in our community today.

The federal Fair Housing Act makes it illegal to discriminate in housing and housing-related transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. Although the discussion in this FHEA report is focused specifically on issues affecting race and ethnicity, additional protected classes also face barriers to fair and equal housing as evidenced in the numbers of fair housing complaints filed, discussed below. Likewise, fair housing issues affecting additional protected classes have an impact on racial and ethnic minorities. In the St. Louis metro area, 14.8 percent of the African-American population is estimated to have a disability, while 11.8 percent of the white population, 7.1 percent of the Hispanic population, and 4.6 percent of the Asian population is estimated to have a disability.¹³⁶ The high proportion of African-Americans with a disability indicates that fair housing barriers faced by persons with disabilities are also issues of racial equity.

132 "A Practical Guide and Toolkit for Affirmatively Furthering Fair Housing" Missouri Commission on Human Rights. August 2012. <http://labor.mo.gov/mohumanrights/Forms/AFFHPracticalGuide.pdf> .

133 "Affirmatively Furthering Fair Housing at HUD: A First Term Report Card: Part II" Poverty and Race Research Action Council, March 2013. <http://www.prrac.org/pdf/HUDDFirstTermReportCardPartII.pdf> .

134 Presentation to EHOC by St. Louis regional field office, Fair Housing and Equal Opportunity, HUD, "Analysis of Impediments: FHEO's review" May 2012.

135 "Jefferson County Analysis of Impediments to Fair Housing Choice" 2010-2011.

136 American Community Survey 3-Year Estimates (2009 – 2011), Disability Characteristics, S1810.

Data on complaints were compiled through information requests to the U.S.

Department of Housing and Urban Development (HUD),¹³⁷ Missouri Commission on Human Rights (MCHR), Illinois Department of Human Relations (IDHR), and the Civil Rights Enforcement Agency of St. Louis city (CREA). Data was also included from EHOc complaint database.¹³⁸ Data was requested on complaints filed between 2007 and 2011 for each county included in the St. Louis region by the basis of the complainant.

Since 2007, a total of 1,128 fair housing complaints have been filed in the St. Louis region (Table 20). The number of complaints was highest in 2010, with 266 complaints. Only 157 complaints were filed in 2011, the lowest number of complaints since 2007.

Overall, race and disability are the protected classes with the most complaints filed between 2007 and 2011. The number of complaints by race and disability are nearly the same, except for in 2010 when disability had the most complaints and in

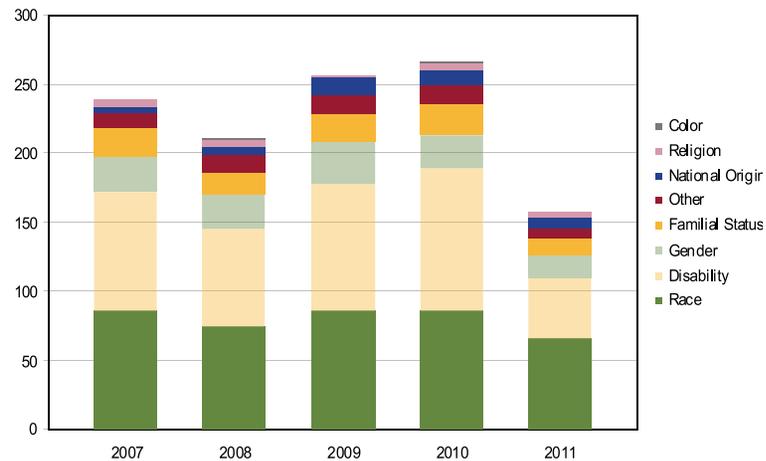
Table 20: Fair Housing Complaints in St. Louis Region

Basis of Complaint	2007	2008	2009	2010	2011	TOTAL
Race	86	74	86	86	66	398
Disability	85	71	91	103	44	394
Gender	26	25	31	24	16	122
Familial Status	21	16	20	23	12	92
Other	11	12	15	14	7	59
National Origin	4	6	12	10	9	41
Religion	5	6	1	5	3	20
Color	0	1	0	1	0	2
TOTALS	238	211	256	266	157	1,128

Source: HUD, MCHR, IDHR, CREA, EHOc

2011 when race complaints were the highest. Gender and familial status comprise the next two protected classes with the highest complaints. The category of *other* represents complaints made on the basis of state and local protections, which could include sexual orientation, gender identity, source of income, marital status, age, or other protections.

Graph 2: Fair Housing Complaints in St. Louis Region



Source: HUD, MCHR, IDHR, CREA, EHOc

¹³⁷ The Missouri side of the St. Louis region is covered by HUD Region VII, and the Illinois side is part of HUD Region V. Both HUD regional offices submitted fair housing complaint data.

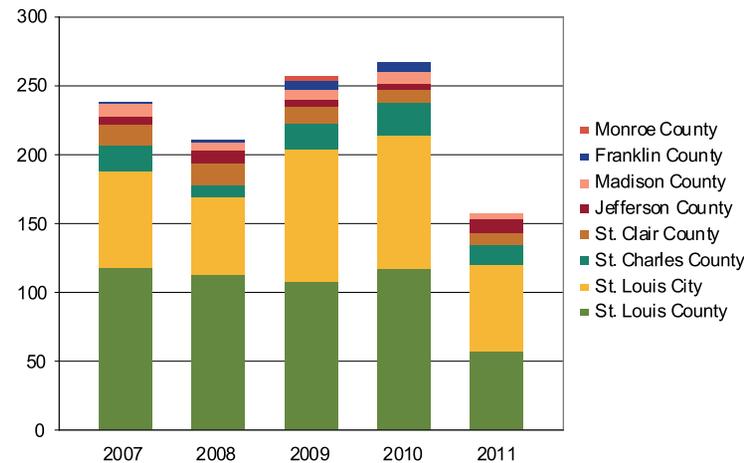
¹³⁸ Because of work sharing agreements between HUD and the fair housing enforcement agencies, and EHOc files complaints with all agencies, this data may have some overlap between cases.

Table 21: Fair Housing Complaints in the St. Louis Region

County	2007	2008	2009	2010	2011	TOTAL
St. Louis County	118	113	108	117	57	513
St. Louis City	70	56	96	97	63	382
St. Charles County	19	9	19	24	15	86
St. Clair County	15	16	12	9	8	60
Jefferson County	6	9	5	5	10	35
Madison County	8	6	7	8	4	33
Franklin County	2	2	7	6	0	17
Monroe County	0	0	2	0	0	2
TOTALS	238	211	256	266	157	1,128

Source: HUD, MCHR, IDHR, CREA, EHOc

Graph 3: Fair Housing Complaints in the St. Louis Region by County



Source: HUD, MCHR, IDHR, CREA, EHOc

139 For more information on municipalities adding sexual orientation and gender identity to human rights statute, see PROMO at www.promoonline.org/issues/local/saint-louis-and-southeast-missouri/current-projects-stl.html.

Table 21 and Graph 3 represent fair housing complaints by each county in the St. Louis region.

In the last five years, a majority of fair housing complaints came from the St. Louis County and St. Louis city. Only two complaints in the last five years were in Monroe County, IL.

Fair Housing Programs

The efforts to end illegal housing discrimination within the region have made a significant impact in increasing access to housing for all people. These fair housing programs have educated the community about fair housing, conducted investigations into housing discrimination and filed administrative and litigation cases, as discussed above. There are also state and local programs active in the St. Louis region, as well as private enforcement organizations that are advocating ending illegal housing discrimination. These efforts and their capacity are detailed follow.

Additional Protected Classes

The federal Fair Housing Act protects against discrimination on the basis of race, color, religion, national origin, gender, familial status, and disability. In addition, state and local human rights statutes have additional protections. In Missouri, ancestry is protected. Illinois protects against discrimination on the basis of marital status, age (40 and over), ancestry, military status and unfavorable discharge, and sexual orientation. St. Louis city protects against discrimination on the basis of sexual orientation, gender identity, and source of income. Recently, many municipalities in St. Louis County have added sexual orientation and gender identity to their human rights statutes that protects against discrimination in housing, employment, and public accommodations. University City, Olivette, Richmond Heights, Clayton, Creve Coeur, Ferguson, Maplewood, and St. Louis County are among the areas that added these protections.¹³⁹

Enforcement Agencies

There are three fair housing enforcement agencies that have jurisdiction in the St. Louis region. The Missouri Commission on Human Rights (MCHR) and the Illinois Department of Human Rights (IDHR) are both state enforcement agencies and the Civil Rights Enforcement Agency (CREA) is the enforcement agency for St. Louis city. These agencies are part of the Fair Housing Assistance Program (FHAP) operated by HUD to investigate and enforce discrimination complaints. A FHAP agency must ensure their human rights statute is substantially equivalent to the federal Fair Housing Act.¹⁴⁰

A recent issue has been the legislative threat to change the state of Missouri's Human Rights Statute. In April 2011, the Missouri Legislature passed SB 188 which was then vetoed by Governor Jay Nixon.¹⁴¹ The bill would have changed the burden of proof for discrimination cases in Missouri and would have eliminated punitive damage claims against public entities. Opponents of the bill feared

that it would cause HUD and the Equal Employment Opportunity Commission to designate Missouri's Human Rights Act as no longer "substantially equivalent" to federal law, costing the state over \$1 million in federal funds to investigate discrimination in housing and employment. Although the Governor vetoed the bill in 2011, the Republican majority and the Chamber of Commerce support the bill and will continue pushing this issue.

Private Fair Housing Organizations

The Metropolitan St. Louis Equal Housing and Opportunity Council (EHOC) is the only private fair housing organization in the St. Louis region. EHOC has been in existence since 1992. EHOC is a Fair Housing Initiatives Program (FHIP) partner with HUD to educate and investigate fair housing issues. The majority of funding for EHOC comes from HUD, St. Louis city Community Development Agency, and St. Louis County Office of Community Development.¹⁴²

EHOC is the only agency in the St. Louis region engaged in discrimination testing. Testing in fair housing enforcement is simulating housing transactions in order to compare the quality, content, and quantity of information and service given to different types of home seekers by housing providers. A test is used to identify evidence of illegal housing discrimination.

EHOC assists clients who have been victims of housing discrimination, as well as filing fair housing complaints on behalf of the agency. Fair housing complaints are filed with HUD, MCHR, IDHR, or CREA.

Fair housing education and outreach is also an important component of EHOC's mission. EHOC provides education on fair housing rights and responsibilities to community members, social service organizations, housing providers, real estate professionals, bankers, local government officials, and city planners, among others.

140 "Fair Housing Assistance Program (FHAP), HUD, http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/partners/FHAP .

141 "Gov. Nixon vetoes Senate Bill 188..." April 29, 2011. http://governor.mo.gov/newsroom/2011/Gov_Nixon_vetoes_Senate_Bill_188 .

142 Metropolitan St. Louis Equal Housing and Opportunity Council, www.ehocstl.org .

Collaborative Efforts to Advance Fair Housing

The efforts of multiple organizations and other stakeholders working to advance fair housing have achieved great success in the St. Louis region. These collaborations have brought fair housing information to the attention of other non-profit organizations and the community.

One collaborative effort is the Real Families Campaign, which is working with municipalities to revise their definition of family to make it more inclusive. Municipalities use a definition of family in order to limit occupancy and prevent overcrowding. However, some definitions of family are exclusive, particularly for non-traditional families. The Real Families Campaign works with municipalities to revise their definition of family and use a model definition that is more inclusive for extended families and non-traditional families.

In 2009, the St. Louis Equal Housing and Community Reinvestment Alliance (SLEHCRA) was formed to increase investment in minority communities, regardless of income, and in low-income communities, regardless of race. SLEHCRA does this by ensuring that banks are meeting their obligations under the Community Reinvestment Act (CRA) and fair lending laws. The coalition includes non-profit and community organizations that are working to increase opportunities for low- and moderate-income communities and communities of color.¹⁴³

The work of SLEHCRA has contributed to over \$14.5 million in increased commitments from banks for community development, including the development of new products designed to meet the needs of unbanked or underbanked households—which are households that either do not have a basic checking account or primarily rely on alternative financial services like check cashers and payday loans; hiring of community development loan officers; and the increased lending to low- and moderate-income borrowers and minority borrowers. In addition, three new full-service bank branches have opened in predominately minority census tracts.

143 For more information, see SLEHCRA's website at www.slehkra.org.



This chapter investigates the major public investments in transportation, housing, and economic development in the St. Louis region and how they affect communities of color, particularly in the racially concentrated areas of poverty and the impact of such on access to opportunities.

Transportation

The expansive highway system, resistance to expanding public transportation to outlying areas of the region and the trend of employment growth further from the urban core (and the transit system) has had a compounding negative effect on access to jobs for the low income population. According to East-West Gateway's *Long Range Transportation Plan*, "Just over half of the region's jobs are accessible within 60 minutes by transit."¹⁴⁴ This means longer and more expensive commute times for low-income people and some jobs that are not accessible to low-income and minority populations in a reasonable commute time. Yet, there are several current transportation projects underway that are

expected to have a positive impact on low-income communities.

Public Transportation

The public transportation infrastructure is considered to be a strength for minority communities and lower-income communities in the St. Louis region; however there are significant limitations in the current transit system that impedes access to areas of opportunity.

As previously described, access to public transportation is currently concentrated in the urban core, with highest levels of access in St. Louis city and inner-ring suburbs in St. Louis County. However, access to transit is limited in west St. Louis County and parts of St. Clair and Madison counties in Illinois. Access to areas of opportunity in St. Charles County and Jefferson County via transit is non-existent.

Much of the limited funding available supports the maintenance and operation of the existing public

transportation system. Although there has been much interest in expansion, there are still many challenges to the expansions laid out in Metro's long range transit plan, such as funding. There is limited or no federal funding for transit. Because of funding limitations, Metro had to make massive cuts to service in 2009. The passage of Proposition A in 2010 helped funding for Metro with a half-cent sales tax increase in St. Louis County.

There are also challenges of community opposition to transit, particularly in outlying suburbs. In 1996, St. Charles County voted against a ballot measure that would bring MetroLink to St. Peters. A sales tax increase for Metro funding failed on a ballot measure in 2008. The Proposition A measure in 2010 experienced significant opposition.¹⁴⁵

Currently, Metro's Long Range Plan identifies projects over the next 30 years. These plans include proposed expansion for MetroLink lines, including lines that would increase access to light rail for racially

concentrated areas of poverty and areas of opportunity. Bus rapid transit lines are also included in the long range plan that would increase access to outlying areas of opportunity within Metro's jurisdiction. However, a major impediment for realizing the long-range plan is financial support.

The Transportation Improvement Plan, which plans and allocates transportation funding for the St. Louis region through East-West Gateway, includes 125 transit projects that mostly focus on improving the existing transit infrastructure, including replacing transit vehicles and upgrading equipment. However, the Loop Trolley is programmed to receive \$44 million for new construction of a fixed-line trolley serving areas of Forest Park and University City along Delmar Blvd.¹⁴⁶

144 East-West Gateway, Long-Range Transportation Plan State of the System, July 2011.

145 "All Aboard? St. Louis County voters talk about how they'll vote on Prop A, the key to Metro's future," St. Louis Beacon, 3/12/10, https://www.stlbeacon.org/#!/content/19338/all_aboard_st_louis_county_voters_talk_about_how_theyll_vote_on_prop_a_the_key_to_metros_future.

146 Transportation Improvement Plan, Fiscal Years 2012 – 2015, East-West Gateway Council of Governments, <http://www.ewgateway.org/pdf/Library/trans/tip/FY2012-2015/TIP-FY2012-2015-Final.pdf>.

The challenges facing public transportation improvement and expansion are serious barriers for increasing equitable opportunities for all people throughout the region.

Transit-Oriented Development

A current topic of planned investment interest is transit-oriented development (TOD). TOD is community development that integrates housing, office, retail and/or other amenities into a walkable neighborhood within a half-mile of quality public transportation. In the St. Louis region, potential TOD developments have been focused around existing MetroLink stations.

The benefit of TOD developments, particularly for low-income communities and minority communities, would be increased opportunities for employment and accessing services.

As part of the Regional Plan for Sustainable Development, five stations have been selected to complete detailed station area plans studying the potential for TOD development. Those five stations area are Emerson Park/Jackie Joyner Kersee, Fairview Heights, North Hanley, Rock Road, and Union Station.¹⁴⁷ Additionally, St. Louis city is developing station area plans for three existing stations and two areas along the proposed Northside/Southside MetroLink alignment, also part of the RPSD.

Highways

The quality and accessibility of major and minor roads also have an effect on the quality of a neighborhood. Historically, highways were designed to increase access to growing suburbs while isolating the inner-city neighborhoods. In St. Louis, “urban renewal” projects included highway developments that displaced African-American residents in downtown St. Louis and north St. Louis.¹⁴⁸

East-West Gateway is the designated regional transportation planning agency for the St. Louis region. The agency plans for and approves the allocation of all federal transportation dollars for the region. The *Regional Transportation Plan* is a 30-year plan. Most of the projects in the current plan are for improving the existing infrastructure. This long-range plan is the overarching plan, which focuses on six priority areas including a priority of access to opportunity that addresses the needs of persons living in low-income communities and persons with disabilities.

Working in conjunction with the long-range transportation plan is the shorter-term *Transportation Improvement Program* (TIP). This program is a financial and implementation program that works on a four-year timeline.¹⁴⁹ Included in this program are smaller local projects for road improvements and sidewalks. Projects are submitted by local jurisdictions to be evaluated and approved for funding by the East-West Gateway Board of Directors.

Included in both long-range and short-term transportation projects are considerations for environmental justice communities, which is a federal requirement to ensure that low-income communities and minority communities are not negatively affected by programs, policies, or activities.¹⁵⁰

A major barrier for lower-income communities in transportation projects is funding. Projects that receive federal funding require match funding from the local jurisdiction. The common requirement is a 20 percent match of funds from the local jurisdiction. Smaller communities and those with fewer resources may have difficulty in coming up with the 20 percent match for a project. The constraint of funding can limit the ability for poorer—and disproportionately minority—communities to compete for transportation improvement projects.

147 St. Louis Regional TOD Study, <http://www.stlouistod.com/> .

148 Gordon, Colin. Page 206.

149 East-West Gateway, Transportation Improvement Program, <http://www.ewgateway.org/trans/tip/tip.htm> .

150 “Environmental Justice: What it Means,” East-West Gateway Council of Governments. Brochure, <http://www.ewgateway.org/AboutUs/BusinessWithUs/EnvJusticeBrochure.pdf> .

A major transportation project currently underway is the new Mississippi River Bridge that connects downtown St. Louis to the Metro East just north of East St. Louis. Revision to highway interchanges in both Missouri and Illinois are also part of the project. This project is estimated to cost \$667 million, with \$239 in federal funding.¹⁵¹ The new bridge is being built in the core of the St. Louis region, with bridge approaches being constructed in areas where reinvestment has been limited in the past several decades. The development is expected to be a catalyst to reinvestment in communities that have been underserved and have a positive impact for some of the communities identified as RCAPs in this report.

Minority inclusion on this project has been an issue. The federal goals for inclusion include commitments that at least 14.7 percent of workers are minorities and at least 6.9 percent of workers are female. In September 2011, there were protests in the Metro East over the actual diversity of the workforce

and disputes about the figures released by the Illinois Department of Transportation, especially considering the area surrounding the project is predominately minority. According to KMOV, East St. Louis Mayor Alvin Parks and other community leaders and construction workers met with the Illinois governor and IDOT to secure commitments for higher numbers of minority workers and women workers.¹⁵² As of September 2012, the project reported that 23.3 percent of workers overall were minority and 5.2 percent of workers overall were women.¹⁵³

Economic Development

Public investments for economic development come primarily through subsidies on the state or local level. Federal funding for economic development through the “urban renewal” projects ended in the 1970s. Now, entities in the St. Louis region use a mix of financing from state, local, and private sources to spur development.¹⁵⁴ There are currently several economic development initiatives in the St. Louis region that are

located in minority and low-income communities and could potentially create more opportunities for minorities and low-income persons.

Economic Subsidies

According to a 2011 study by the East-West Gateway Council of Governments, over \$5.8 billion in public tax dollars has been diverted over the last 20 years to subsidize private development. These subsidies are through tax increment financing (TIF), special taxing districts, tax abatements, and state programs. One of the key findings of East-West Gateway’s report is that the use of tax incentives has exacerbated economic and racial disparities. These subsidies have primarily been used in areas like the central business district, while skipping over areas like north St. Louis city, which puts these lower-income and predominately minority communities at a disadvantage in attracting new investments.

Major Developments in the St. Louis Region

The Metropolitan Sewer District (MSD) is beginning a multi-billion dollar, multi-year Capital Improvement and Replacement Plan (CIRP). This massive project is a result of a settlement after the United States filed suit against MSD in 2007 for illegal overflows of sewage. The settlement calls for MSD to spend \$4.7 billion in improvements over the next 23 years. Part of the settlement also includes MSD spending \$100 million in a green infrastructure program focused on low-income or minority communities that have been disproportionately affected by air, water, and land pollution.¹⁵⁵

To pay for the improvements, a \$945 million bond issue was passed in St. Louis city and St. Louis County on the ballot in June 2012. This allows for a gradual increase

151 New Mississippi River Bridge Project, <http://www.newriverbridge.org/overview-intro.html> .

152 “Mississippi River Bridge project protestors call off highway shutdown,” KMOV, 9/16/11, <http://www.kmov.com/news/local/Mississippi-River-Bridge-project-protestors-call-off-highway-shutdown-129999153.html> .

153 “Use of Minorities and Females in the Workforce,” Fact Sheet. New River Bridge, <http://www.newriverbridge.org/documents/Workforceupdate09September2012-overall.pdf> .

154 “An Assessment of the Effectiveness and Fiscal Impacts of the Use of Development Incentives in the St. Louis Region,” East-West Gateway Council of Governments, Jan. 2011.

155 “St. Louis MSD, EPA file \$4.7 billion settlement.” St. Louis Business Journal, 8/4/2011. <http://www.bizjournals.com/stlouis/news/2011/08/04/st-louis-msd-epa-file-47-billion.html?page=all> .

in sewage bills over the next few years. Bills will increase from \$28 to \$43 by July 1, 2015.

MSD's diversity commitment for the sewage improvement project has been under pressure by the NAACP, minority construction worker groups, and other organizations. In July 2012, the NAACP presented a community benefits agreement to MSD that proposed living wage requirements, training and apprenticeship programs, and first source hiring.¹⁵⁶

MSD is currently conducting a disparity study before they commit to any new goals. Meanwhile, an interim resolution passed in March 2012 committed to various goals depending on the type of work, including construction contract commitment of 25 percent

minority business enterprises and 5 percent women business enterprises.¹⁵⁷

The Central West End in St. Louis city has a few major development projects slated to come to the surrounding neighborhood. The neighborhood currently has a population of 28 percent black, 11 percent Asian, and 2 percent Hispanic. The neighborhood just north of the Central West End is considered a racially concentrated area of poverty.

CORTEX is planning a five-year, \$186 million development in the Central West End. CORTEX is a bioscience and technology research park. The total project is expected to bring 1,400 new jobs in technology and building services fields, as well as public infrastructure projects and green space development.¹⁵⁸ The project is seeking financing assistance from St. Louis city and the state. However, there are concerns with CORTEX's level of diversity commitment. An article in the St. Louis American reports that CORTEX, as a

hub of organizations, does not have a diversity plan. The article reports that St. Louis city officials say the project should follow the city's ordinance for workforce inclusion goals for minorities and women, both for the development and also in employment.¹⁵⁹ Additionally, a Whole Foods grocery store is expected to be developed in the Central West End beginning in 2013.

Northside Regeneration is a planned project by private developer Paul McKee that would redevelop areas of north St. Louis city, including neighborhoods just north of downtown to Jeff VanderLou. The plans are for the redevelopment of 1,500 acres, which McKee has been acquiring from St. Louis city for years. McKee's vision is for homes, retail, offices, and industrial space to be developed in phases over the next 23 years for a total of more than \$8 billion.¹⁶⁰ The St. Louis City Board of Aldermen approved the use of \$390 million in TIF financing for the Northside Regeneration project. However, the plans have been subject to court challenges

that have stalled the project since July 2010. St. Louis Circuit Judge Dierker ruled that the TIF package passed by the city did not conform to the state law because it lacked specific "shovel-ready" projects and was too broad. The case is currently in consideration by the Missouri Supreme Court.¹⁶¹

While city of St. Louis officials are behind McKee's plans, many are skeptical about the feasibility and specifics of the redevelopment plans. Many are concerned about the impact of the redevelopment plans on the existing homeowners and residents. The plaintiffs in the lawsuit are four individual homeowners from the area McKee proposes to redevelop. They challenged the planned use of TIF financing because of the required "blight" status that has depressed their property values. The area of Northside Regeneration is predominately African-American and low-income. Much of the area is considered a racially concentrated area of poverty in this report.

156 "NAACP offers MSD Community Benefits Agreement." St. Louis American, 07/26/12, http://www.stlamerican.com/diversity/article_6cabc4cd723-11e1-8549-0019bb2963f4.html.

157 "MSD passes resolution setting interim minority contracting goals," St. Louis Beacon, 3/9/12, https://www.stlbeacon.org/#!/content/23154/msd_contracting_030812.

158 "Cortex plans \$186 million in new biotech development," St. Louis Business Journal, 10/22/12, <http://www.bizjournals.com/stlouis/blog/BizNext/2012/10/cortex-plans-186-million-in-new.html?page=all>.

159 "CORTEX admits no inclusion plan for 15k jobs," St. Louis American, 10/18/12, http://www.stlamerican.com/news/local_news/article_6be8944e-18c7-11e2-ba0f-0019bb2963f4.html.

160 "McKee's Northside rehab vision goes to Missouri Supreme Court," St. Louis Beacon, 11/28/12, https://www.stlbeacon.org/#!/content/28238/mckee_supreme_court_112812.

161 "NorthSide Subsidies in hands of Missouri Supreme Court" St. Louis Post-Dispatch, 11/29/12, http://www.stltoday.com/news/local/govt-and-politics/political-fix/northside-subsidies-in-hands-of-missouri-supreme-court/article_3810702a-d1a2-5fa0-a3c6-6c32626669d7.html.

The Southwest Illinois flood prevention project is currently underway to improve the levees along the Mississippi River in the Metro East.

The project is a partnership between Madison, Monroe, and St. Clair counties. The project, estimated to cost \$161 million, will bring levees up to federal standards to prevent the American Bottom flood plain from receiving a special flood hazard area classification. The project timeline has been delayed, but is estimated to be complete in 2015.¹⁶² A 0.25 percent sales tax increase was passed to provide financing.¹⁶³ This area includes areas of high minority population and high poverty rates, including the racially concentrated areas in Venice and East St. Louis.

Housing and Community Development

Subsidized Housing

The chapter on segregated areas analyzed the placement of subsidized housing throughout the region (see page 24), including public housing and Section 8 Housing Choice Voucher use, and found that subsidized housing is disproportionately located in predominately minority areas. Similarly, tax credits for low-income housing have also mainly gone to developments in predominately minority areas. The location of subsidized and assisted housing continues to perpetuate segregation and racial disparities.

Recently, low-income housing developments have been financed through a mix of partnerships from public housing authorities, tax credits, private developers, and non-profit organizations. In Madison County, Illinois, the John W. Hamm III Apartments opened in November 2012 with 55 units of affordable housing

Table 22: Community Development and Planning Allocations by Jurisdiction

State	Name	CDBG	HOME	ESG	HOPWA
IL	Alton	\$784,119	\$0	\$0	\$0
IL	Belleville	\$558,147	\$0	\$0	\$0
IL	East St Louis	\$1,465,460	\$289,657	\$0	\$0
IL	Granite City	\$638,725	\$0	\$0	\$0
IL	Madison County	\$1,073,904	\$720,151	\$0	\$0
IL	St Clair County	\$1,137,611	\$610,031	\$0	\$0
MO	Florissant	\$215,673	\$0	\$0	\$0
MO	Jefferson County	\$1,051,604	\$0	\$0	\$0
MO	O'Fallon	\$229,787	\$0	\$0	\$0
MO	St Charles	\$283,129	\$0	\$0	\$0
MO	St Louis	\$16,796,248	\$2,383,586	\$1,543,959	\$1,394,864
MO	St Louis County	\$4,565,169	\$2,820,787	\$440,727	\$0
MO	St. Charles County	\$627,095	\$0	\$0	\$0

Source: HUD Office of Community Planning and Development

developed by Madison County Housing Authority, local governments, and Housing Solutions, Inc. The Tyrone Echols Apartments also are opening in Venice, IL with 23 units of affordable housing.¹⁶⁴

In St. Louis city, the St. Louis Housing Authority and developer McCormack Baron Salazar opened the first phase of North Sarah in October 2012. This development is a 120-unit mixed-income development incorporating 59 public housing units in north St. Louis city.¹⁶⁵

¹⁶² St. Louis Metro East Levee Issues Alliance, Current Status, <http://www.stlmetroeastlevees.org/issues/current-status/>.

¹⁶³ Southwestern Illinois Flood Prevention District Council, <http://www.floodpreventiondistrict.org/>.

¹⁶⁴ "Madison County Housing Authority unveils housing redevelopment," Belleville News Democrat 11/30/12, <http://www.bnd.com/2012/11/30/2412484/madison-county-housing-authority.html>.

¹⁶⁵ "North Sarah apartments take tenants from projects," St. Louis Post-Dispatch. 10/26/12, http://www.stltoday.com/business/local/north-sarah-apartments-take-tenants-from-projects/article_a76efe61-ec6f-58a4-9b77-1918f4d80b54.html.

Community Development Funding

The U.S. Department of Housing and Urban Development administers the community planning and development programs. These include Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Housing Opportunities for Persons with Aids (HOPWA), and Emergency Solutions Grants (ESG).

For FY 2012, the following jurisdictions received the following allocations under each program (Table 22). Granite City's and Alton's allocations are administered by Madison County, and East St. Louis and Belleville's funds are administrated by St. Clair County. These operate under a joint grant agreement.

The CDBG funding program specifies that funding must go to activities that benefit low- and moderate-income persons. According to HUD requirements, "activities must benefit low- and moderate-income persons, prevent or eliminate slums or blight, and/or address community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community for which other funding is not available."¹⁶⁶

In the St. Louis region, the use of CDBG funding varies by entitlement jurisdiction. According to a review of consolidated plans, many municipalities use funds for affordable housing development, home improvement loan programs, emergency repair loan programs, and property maintenance programs.

A down payment assistance program for low- to moderate-income first time homebuyers is also a significant community development program within the region that is provided through the St. Louis HOME Consortium. The St. Louis HOME Consortium is comprised of St. Louis County, St. Charles County, Jefferson County, city of Florissant, O'Fallon, MO, city of St. Charles, and Wentzville. The Consortium provides a zero interest loan for up to \$5,000 that is forgivable after five years for income-eligible first time homebuyers.

Funding for non-profit community organizations and community development corporations are also part of CDBG funding with funds going to public services, neighborhood revitalization, lead remediation, and fair housing activities.

Of entitlement jurisdictions, only St. Louis County and St. Louis city have funding allocated specifically to fair housing outreach and education. These amounts, for the FY 2012, represent 0.2 percent of CDBG funding for those jurisdictions.

Under the CDBG program, entitlement jurisdictions are required to certify that they are "affirmatively furthering fair housing." In addition, CDBG activities should be addressing the barriers to fair housing choice that were identified in local jurisdictions' *Analysis of Impediments to Fair Housing*. The review of consolidated plans and annual action plans for entitlement jurisdictions did not include summaries of identified impediments to fair housing and did not identify specific activities that were undertaken to affirmatively further fair housing.

166 "Community Development Block Grant Program," U.S. Department of Housing and Urban Development, http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/programs .

7

Major Findings and Recommendations



The following findings and recommendations are based on the FHEA analysis as well as discussions with RPSD committees. Appendix 1 provides a more detailed discussion of these deliberations as well as a discussion of how the FHEA will be used to inform the strategy development, priority setting and investments of the region, as outlined in the regional plan for sustainable development, OneSTL.

Findings and Recommendations

Each finding identifies a potential objective that the RPSD can adopt into the broader regional plan and recommendations for strategies that address the major concerns of the FHEA. For each recommendation, specific action steps are identified with a level of priority that corresponds with timeframes over the next three years. *Level One* priority items have the ability to be addressed within one year and utilize existing structures and/or programs that can assist in implementing the action. *Level Two* priorities

are items that can be reasonably addressed in two to three years.

The recommendations and action steps identified in this section are designed for the RPSD and planning partners to continue to engage with the findings of the FHEA and to adopt actions that will work to undo historical segregation and affirmatively further fair housing. This final step, the “bridge,” connects the findings of the FHEA data analysis into the decision-making for the final plan for sustainable development. (See Appendix 1 for further discussion of the FHEA Bridge.)

1. Segregation Remains Persistent Issue

Objective: Promote racial integration throughout the region.

Recommendation 1.1: Education and marketing about the benefits of an integrated community.

A regional marketing effort would promote integrated and diverse communities and would expand information about housing choices throughout the region.

Suggested Actions:

- Develop widespread education and marketing messages that explicitly promotes racial and ethnic diversity and highlights the benefits of integrated communities. *Level One.*
- Develop and promote the regional use of MoveSmartSTL.org, a website designed with a search function that increases housing choices in diverse areas for people looking to move. *Level One.*
- Encourage local governments to promote information about integrated communities on their websites and in education materials as part of affirmatively furthering fair housing requirements. *Level Two.*

Recommendation 1.2:

Increase regional fair housing enforcement through testing. Discrimination testing is one of the best ways to uncover discriminatory housing practices and is one way of demonstrating commitments to affirmatively furthering fair housing.

Suggested Actions:

- Encourage local governments to conduct fair housing testing in rental, sales, and lending markets as a part of their obligations to affirmatively further fair housing. *Level One.*

2. Location of Affordable Housing Perpetuates Segregation and Limits Access to Opportunity

Objective: Increase availability of affordable housing outside of areas of concentrated poverty.

Recommendation 2.1:

Comprehensive collection and analysis of all regional zoning and land use plans. Consistent with the *RPSD Housing Assessment’s* recommendation, a library of zoning ordinances would be helpful on a regional scale for research purposes and identification of potential exclusionary zoning.

Suggested Actions:

- Prioritize the funding of a study that collects and analyzes regional zoning and land use plans. *Level One.*
- Make data on zoning and land use plans publicly available online through data web portal. *Level Two.*

Recommendation 2.2: Increase incentives for developing affordable housing in areas of high opportunity. Affordable housing in areas of opportunity will need to be in close proximity to access to transit (bus stops or light rail stations), as well as close to job centers.

Suggested Actions:

- Discuss with state housing finance agencies how to include a greater consideration for low-income housing tax credit developments in areas with lower minority populations and areas of high opportunity as part of the Qualified Allocation Plan (QAP) criteria for development proposals. *Level One.*
- Promote local governments to use density bonuses to encourage development that increases the percentage of affordable units in new

developments, locating housing near transit and employment centers, projects that utilize *universal design*, or for developing infill sites. *Level Two.*

Recommendation 2.3: Increase the use of inclusionary zoning requirements that require a percentage of affordable units be included in new housing developments.

Suggested Actions:

- Prioritize development around transit stations that include a certain percentage of affordable housing units (such as 10-15 percent of units per development). *Level One.*
- Advocate municipalities to pass an Inclusionary Zoning ordinance by providing models and support for an ordinance. *Level Two.*

Recommendation 2.4: Increase protection for source of income discrimination to include protections for housing financial assistance like Section 8 vouchers. Adding protection in human rights statutes for voucher holders would prohibit landlords and housing providers from

refusing to count Section 8 voucher holders or other recipients of financial assistance as household income.

Suggested Actions:

- Encourage municipalities to include this protection in their human rights statute by providing model language and support for this amendment. *Level One.*
- Support an expansion of the state-wide human rights act to include source of income and specifically housing financial assistance protections. *Level Two.*

Recommendation 2.5: Promote regional use of SocialServe.com to increase availability of affordable rental housing. SocialServe.com currently is the premier source for locating affordable housing units, and is provided for some counties in the region. Increasing advertising of affordable or market-rate housing on SocialServe.com throughout the region would provide increased choices for housing seekers.

Suggested Actions:

- Advise counties that currently do not contract with SocialServe.com to add their participation. *Level One.*
- Promote SocialServe.com to local governments and landlords for advertising properties and providing information about SocialServe.com in flyers, on websites, and in other information. *Level Two.*

3. Not-In-My-Backyard (NIMBY) Sentiment Is Barrier for Integrating Communities

Objective: Promote racial and economic diversity in communities throughout the region.

Recommendation 3.1: Educate and market about the benefits of a racially and economically integrated community. A proactive message needs to highlight the benefits of a racially and economically diverse community. See also Recommendation 1.1.

Suggested Actions:

- Develop education and marketing messages on the benefits of racially and economically diverse communities. *Level One.*
- Partner with relevant organizations to reinvigorate affordable housing messaging and expand campaign to include benefits of racial diversity. *Level One.*

Recommendation 3.2:

Target education and marketing to local government officials about the needs of more affordable/workforce housing.

Suggested Actions:

- Develop education messages that combat misconceptions and promote the economic benefits of affordable and workforce housing. *Level One.*
- Provide education around affordable and workforce housing strategies for local governments. *Level One.*

Recommendation 3.3:

Increase fair housing education for local governments, housing professionals, and members of community. Knowledge

about the Fair Housing Act and illegal housing discrimination helps stem cases of discrimination and provides increased awareness about fair and equal housing choices.

Suggested Actions:

- Partner with fair housing organizations and other organizations that work with protected classes to provide increased fair housing trainings in local municipalities and throughout the region. *Level One.*
- Provide increased fair housing education resources and materials for local governments and community members. *Level Two.*

4. Racially Concentrated Areas of Poverty (RCAPs) Have a Need for Increased Quality of Life Investments

Objective: Prioritize comprehensive community development in areas of concentrated poverty.

Recommendation 4.1:

Support organizations working in RCAPs to improve housing, access to services, and quality of life.

Suggested Actions

- Prioritize community development programs in RCAP areas that increase quality of life. *Level One.*
- Encourage local governments to prioritize funding for organizations working in areas with high poverty rates like the RCAPs through their economic councils and community development block grant funds. *Level Two.*
- Encourage collaborative efforts to develop comprehensive strategies for investments that could leverage private funders on a large scale. *Level Two.*

Recommendation 4.2:

Increase investment in RCAPs through bank obligations to the Community Reinvestment Act (CRA). The Community Reinvestment Act is a regulation that requires depository institutions to serve all parts of the community, particularly low- and moderate-income communities. Along with fair housing and fair lending obligations, the CRA is an important tool that encourages investment in low- and moderate-

income communities and communities of color.

Suggested Actions:

- Support the adoption of responsible banking ordinances in local municipalities. Such ordinances require banks receiving municipal deposits to have a high level of bank services and investments in underserved communities. *Level Two.*
- Promote partnerships between community organizations and financial institutions that increase services and investments in low-income communities and fulfill bank CRA obligations. *Level Two.*

Recommendation 4.3:

Prioritize public infrastructure projects in RCAPs.

Suggested Actions:

- Prioritize RCAP areas in transportation planning and allocation through the long-range transportation plan, the *Transportation Improvement Program (TIP)*, and Great Streets Initiative by continuing to consider “environmental justice” communities. *Level One.*





Recommendation 4.4:
 Prioritize Transit-Oriented Development in RCAP areas.

Suggested Actions:
 • Prioritize transit-oriented development at MetroLink stations that are in or close to RCAP areas. *Level One.*

5. Transit Limits Access to Opportunity for Minority Communities

Objective: Expand transit access to areas of opportunity throughout the region.

Recommendation 5.1:
 Prioritize transit projects that increase access to areas of opportunity.

Suggested Actions:
 • Continue to prioritize projects through the long-range transportation plan that increase access from low-income and minority communities (“environmental justice communities”) to areas of high opportunity. *Level One.*

Recommendation 5.2:
 Make expansion of transit a priority for the region. The current Metro system

disproportionately serves the urban core and limits access to areas of high opportunity.

Suggested Actions:
 • Prioritize expansion of transit across the St. Louis region. *Level One.*

6. African-Americans Face Disparity in Economic Opportunities

Objective: Reduce racial disparities in education and employment opportunities among African-Americans.

Recommendation 6.1:
 Increase resources for compliance of workforce diversity and inclusion goals.

Suggested Actions:
 • Prioritize additional research and investigation into minority hiring and training to evaluate compliance with diversity inclusion plans. *Level One.*

Recommendation 6.2:
 Increase education and enforcement resources under Section 3 requirements. Section 3 is a requirement of federal-funded projects to include job opportunities and job training for very low-income

individuals, homeless individuals, and persons who live in HUD-funded housing, which are disproportionately minority individuals. Increasing capacity of Section 3 would increase job opportunities for minority individuals.

Suggested Actions:
 • Engage with relevant partners to increase education and enforcement about Section 3 hiring and training. *Level One.*
 • Prioritize research of Section 3 compliance throughout the region as a way of meeting affirmatively furthering fair housing obligations. *Level One.*

Recommendation 6.3:
 Include discussion of quality public education as part of the regional plan.

Suggested Actions:
 • Foster discussions about access to quality education that provides equitable access for all students. *Level One.*
 • Partner with relevant stakeholders to address disparities in school performance throughout the region. *Level Two.*



1

Appendix: FHEA Bridge

Deliberation and Stakeholder Engagement

EHOC and EWG engaged partners in discussions of the data and information presented in the FHEA, obtained feedback on the findings and incorporated that feedback into the final draft of the FHEA, when appropriate. The following are the six primary meetings that served this purpose with additional one-on-one conversations with other partners:

1. RPSD Housing Committee, October 24, 2012

The committee is comprised of 40 members who represent organizations working on various aspects of housing throughout the region. This meeting focused on discussing ideas for the report.

2. RPSD Housing Committee, February 19, 2013

This meeting focused on discussing and developing the findings and recommendations of the FHEA.

3. RPSD Steering Committee, February 28, 2013

The committee is comprised of 28 local leaders who represent a diverse array of organizations from throughout the region. This meeting focused on discussing and developing the findings and recommendations of the FHEA.

4. RPSD All Committees Goal and Objective Meetings, March 5 and March 27, 2013

RPSD staff hosted two meetings with about 75 members in attendance at each. Each meeting had two small group discussions on the Inclusive goal area, which was informed by the FHEA.

5. EHOC Annual Fair Housing Training Conference, April 5, 2013

Approximately 30 people attended the Sustainable Communities are Equitably Integrated Communities session which focused on the regional plan and the FHEA.

6. Goal Area Metric Meetings on Inclusive Goal, May 23, 2013

The Outcome Management Committee hosted meetings on each goal area to discuss the metrics that will be used to measure the performance of OneSTL.

7. St. Louis HUD Division Directors, June 6, 2013

EHOC and EWG staff met with directors of each of the divisions of HUD local office to discuss the regional plan and the FHEA.

The key feedback of these discussions and revisions made to the FHEA include:

- The feedback was overwhelmingly positive. At each discussion, members recognized that the results of the work are well known but there is tremendous value in having the intensive detailed data analysis for the entire region in one report. The discussions largely affirmed that the FHEA includes the major issues that are pertinent to include. While having the data available for the discussion was seen as a valuable tool, there was a strong desire to move into action and

addressing these problems. The local HUD office officials are particularly interested in obtaining the final report due to the value it can bring to current conversations and discussions in which they are engaged.

- The focus on moving people out of black communities to areas of opportunity was questioned several times. People noted the importance of both increasing development and improving quality of life in RCAPs as well as increasing opportunities for low-income and minority populations in areas of opportunity. Recommendation 4, as well as several of the other recommendations (1.1, 2.2, 2.5, 3.2 and 3.3), was refined to ensure this need is addressed.
- Concern was expressed that education needs to be a part of this conversation due to the important role it plays in breaking down the barriers of segregation and unequal treatment. Recommendation 6.3 was added to address this concern.
- Concern was expressed that persons with disabilities are not included in the analysis. While EHOC pointed out

that this report is focused on racially and economic disparities, it was recognized that this is an important group to include in the discussion. The disabled population is particularly important because minorities with disabilities face heightened vulnerability, and therefore access for disabled people has an effect on racial equity. Recommendation 2.2 was revised to help address this concern, adding in the need to promote building accessible, affordable housing using universal design standards.

- The draft findings recommended that housing professionals undertake an education and marketing campaign about the benefits of an integrated community. It was pointed out that local governments might be better positioned to market the inclusiveness and the benefits of diverse neighborhoods. Recommendation 1 was revised accordingly.
- It was pointed out that East-West Gateway's selection process for transportation programs already allocated additional points to environmental justice areas and

therefore the language of the recommendation was revised to state "continuing to prioritize environmental justice areas."

Incorporating the FHEA into Decision-making

In addition to the six findings and recommendations, the FHEA provides a valuable tool that is being used to inform the strategy development, priority setting, and investments as part of the regional plan for sustainable development, OneSTL. As the structure for implementation of the plan is put into place, the FHEA will be used in discussions to ensure fair housing issues are adequately incorporated into the final plan. This will be accomplished in several ways, including:

1. Development of goals, objectives and metrics:

The FHEA is one of many deliverables developed through the regional planning process that is being used to develop goals, objectives and performance measurements for the final regional plan. The final goals, objectives and metrics will be determined based on the priorities of the OneSTL

partners, data availability and other criteria. The following draft objectives and metrics relate directly to the FHEA and are currently under consideration as part of the regional plan.

Connected Goal Area

Objectives:

- Increase system-wide accessibility for all users. Continue to support, develop and enhance a transportation system that allows all users to reach desired destinations.

Metrics:

- Transit Access: Percent of jobs and residents within ¼ mile of a transit stop

Distinctive Goal Area

Objectives:

- Invest in existing communities: Preserve historic places and invest in built communities.
- Increase diversity of housing: Provide a full range of housing opportunities including a variety of affordable and accessible options to accommodate changing family and individual needs.
- Reduce combined housing and transportation costs: Encourage land use and transportation planning that increases access and reduces costs for residents.

Metrics:

- H+T Affordability: Proportion of household income spent on housing and transportation costs
- Reinvestment in Existing Communities: TBD/currently under development

Prosperous Goal Area

Objectives:

- Provide quality training: Provide training to prepare the workforce for the jobs of today and the future

Metrics:

- Jobs/Housing Mismatch: TBD/currently under development
- Poverty Rate: Percent of residents living in poverty

Educated Goal Area

Objectives:

- Improve quality of education: Improve the quality of education at all levels, recognizing the importance of the success of all residents to the prosperity of the region.

Metrics:

- Education Quality: Student Achievement TBD/currently under development

Inclusive Goal Area

Objectives:

- Eliminate concentrated poverty: Spur redevelopment in areas of concentrated poverty and increase housing and job opportunities for low-income residents.
- Encourage integrated communities: Provide services and assistance to neighborhoods and communities that are interested in maintaining or improving racial, social and economic integration of its residents.
- Improve access to opportunities: Address racial and economic disparities by providing access to jobs, housing, education, health care, financial services and other basic services to all residents and in all communities.
- Invest in established communities: Promote maintenance, rehabilitation, and repurposing of existing infrastructure.
- Improve quality of neighborhoods: Increase safety and quality of housing and neighborhoods through enhanced code enforcement, infrastructure improvements, and equitable provision of service.

Metrics:

- Stably Integrated

Communities: Percent of residents who live in stably integrated communities

- Housing Affordability: Percent of renter units and owner units affordable to households earning 80% of HUD area median family income

- Housing Choice: Percent of housing affordable to low, moderate and high-income households in the region.

- Concentrated Poverty: Percent of residents living in a concentrated area of poverty
- Income Inequality: The Gini Index.

- Access to Opportunities: Percent of low-income residents who living within 1 mile of a bank, school, and health care facility

2. Development of St. Louis Data Exchange:

As part of the regional planning process, OneSTL partners are developing the St. Louis Data Exchange. The web portal will provide data and mapping tools that can be used by partners, as well as the general public, to understand the barriers and assets that exist to making the St. Louis region more

economically, socially and environmentally sustainable. The data and maps produced through the FHEA will be incorporated on the portal to further the discussion of fair housing.

3. Development of OneSTL Best Practices Toolkit:

As part of the regional planning process, OneSTL partners are developing a web-based toolkit that will provide detailed descriptions of tools, best practices and model ordinances that can be used by local governments and other organizations to implement sustainable practices. The following tools, which relate directly the FHEA, are being considered for inclusion in the toolkit: affirmatively furthering fair housing, density bonuses, fair housing testing, source of income protection legislation, using socialserve.com, responsible banking ordinance, section 3 hiring and training, and housing counseling centers.

4. Development of Implementation Plan:

Discussions with key partners are currently underway to determine the short and long-term action plans for the regional plan. The FHEA will be a key tool in these discussions. EHO and EWG have already met with the local HUD office as the first step in these discussions. Additional discussions are being planned to directly discuss the recommendations and findings of the FHEA and the relevant objectives in OneSTL.

5. Report out and Evaluation of OneSTL:

On an annual basis OneSTL will report on the region's progress in meeting its sustainability goals and assess what changes should be made to increase the region's progress in meeting those goals. The annual report and evaluation will rely in part on the deliverables produced during the planning process. For example, the FHEA will be used to assess the region's progress on addressing fair housing and inequity challenges in the region.



EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

Gateway Tower
One Memorial Drive, Suite 1600
St. Louis, MO 63102-2451

314-421-4220
618-274-2750

www.ewgateway.org