

ATTAINABLE HOUSING IN LEE COUNTY: 2018 REPORT

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I. Introduction

Housing cost is a fundamental factor for the economic vitality of Lee County's households, neighborhoods, and cities. Particularly, the cost of housing impacts disposable income and household capacity to absorb emergency costs from a disabled car or trip to the emergency room. The cost of housing affects commute times and municipal road maintenance. Perhaps most important, the cost of housing dictates the ability of employers to attract and retain a superior workforce. When the cost of housing is out of reach for even middle-income workers, a region's economic competitive edge is lost to communities where housing is attainable and accessible to jobs.

This report details the housing environment in Lee County, with a specific focus on middle-income households - those earning just at or above the region's median household income. In more concrete terms, this report reviews the housing choices an entry-level nurse, making \$33,550 per year, faces as he or she looks for an apartment, or a home to purchase. The findings in this report should be of concern to the public, elected officials, community development agencies, and the business community. Single family homes are increasingly cost prohibitive for middle income families, median rents are spiking, and the share of households spending more than 30% of their income on housing is growing by the year. Lee County faces a considerable and growing challenge in meeting the housing needs of its middle-income residents.

Fortunately, the situation is reversible. The availability of a diverse range of housing products is, fundamentally, a matter of policy. The market does not dictate housing development so much as capitalize on opportunities presented by the regulatory environment. This report details a set of concrete recommendations that, when acted upon in a comprehensive and holistic fashion, will make a significant difference in the housing environment in Lee County.

II. Project Scope

This project details the need for attainable housing in Lee County. For the purposes of this report, attainable housing is defined as housing stock affordable to households earning between 80% and 120% of area median income (AMI). Table 1 shows the Lee County income limits for 80% and 120% AMI households as published by the Florida Housing Finance Corporation (FHFC) in 2018. Depending on the number of persons in the household, the AMI income limit adjusts. For a 1-person household at 80% AMI, the income limit is \$35,840 per year. For a 4-person household at 80% AMI, the total household income limit is \$50,960.

	Income Limit by Number of Persons in Household			
AMI Category	1	2	3	4
80%	\$35,840	\$40,800	\$45,920	\$50,960
120%	\$53,250	\$61,200	\$68,880	\$76,440
Source:	FHFC 2018 SHIP Rental Limits			

Table 1. Income limits of study target population.

Community development and housing professionals often refer to “affordable housing” as housing affordable to a specific household income threshold (typically below the 80% AMI threshold used in this report). In this report, the phrases “affordable housing” or “affordable” are used to denote housing that is naturally affordable to the study’s target population, as opposed to its traditional use in the broader community development field.

Wherever possible, this report identifies the household size and AMI threshold category used in its analysis, particularly in the section on housing and income in Lee County. In general, when referring to affordable rent to the target population, the 3-person household income limit is used. The 3-person household income limit is used in this report in the rental context for two reasons: 1) the average household size for rental households is estimated at 3.08 (2016 ACS Table DP04), and 2) the target population is assumed to include a majority of entry-level workers less likely to have large families.

III. Quantifying the Need for Attainable Housing

This report details a critical shortage of attainable housing in the County and its various municipalities. In order to demonstrate the full breadth of the mismatch between supply and demand of affordable housing to the workforce, and to demonstrate the degree of cost burden in Lee County, this section provides an abbreviated summary of quantitative attainable housing findings.

Unless otherwise noted, the values indicated here were extracted from 2016 PUMS/ACS data and analyzed by the Florida Housing Coalition and represent data for all census tracts in Lee County, including municipalities.

- In Lee County there are approximately 107,318 households spending over 30% of income on housing costs. These are considered cost burdened households.
- 52,430 households spend 50% or more of household income on housing. These are considered severely cost burdened households.

- There are approximately 34,007 elderly households (over the age of 65) spending more than 30% of household income on housing costs. These are cost burdened senior households.
- There are approximately 275,102 total households in Lee County. Of this total, 177,976 households earn at least 80% of AMI. Of the 177,976 households, 35,984 (20.2%) are cost burdened.
- By 2020, an estimated 39,629 households earning at or above 80% AMI will be cost burdened. Of this total, 8,355 (21.1%) will be renters and 31,274 (78.9%) will be owners (Florida Housing Coalition summary of Shimberg Center for Housing Studies household projection and cost burden estimates).
- By 2025, an estimated 43,642 households earning at or above 80% AMI will be cost burdened. Of this total, 9,329 (21.4%) will be renters, and 34,313 (78.6%) will be owners (Florida Housing Coalition summary of Shimberg Center for Housing Studies household projection and cost burden estimates).
- In total, there are an estimated 7,140 entry-level electricians, firefighters, nurses, pharmacy technicians, plumbers, police, and preschool teachers in the Lee County/Fort Myers Metropolitan Statistical Area (MSA) combined. On average, persons in these occupations spend 38% of their income on rent (Florida Housing Coalition Analysis, FL DEO OES 2016).
- On average, households in Lee County spend a combined 58% of income on housing and transportation costs alone (Center for Neighborhood Technology H+T Index, 2016).

IV. Current housing and income landscape in Lee County

Public policy decisions are best made when local conditions are understood. This analysis reviews the current housing and income landscape in Lee County, based on publicly available datasets.

In general, data sourced from the American Community Survey (ACS) or HUD Comprehensive Housing Affordability Strategy (CHAS) data are inclusive of the municipalities within Lee County. For reference, the municipalities included in Lee County statistics are the following:

1. Fort Myers Beach
2. Sanibel
3. Estero
4. Bonita Springs
5. Fort Myers
6. Cape Coral

This analysis recognizes that housing costs, and housing cost burdens for families, is highly dependent on geography. With this in mind, whenever possible this analysis includes geospatial information (mapping) to present patterns of households, income, and housing conditions across Lee County.

Housing Profile

As presented in Table 2. Housing in Lee County, according to 2016 1-year ACS data there are 385,106 total housing units in Lee County. Of this total, 261,735 are considered occupied housing units (68% of the total), and 123,371 are considered vacant (32%). Of the 123,371 vacant units, 97,709 of them are vacant due to seasonal, recreational, or occasional use (79.1% of vacant units).

Unsurprisingly, the vacancy rate among these housing units is higher for rental units (6.8%) than for homeowner units (2.8%). It is common for rental unit vacancy rates to be higher than homeowner rates due to higher turnover in rental units and more stability in homeowner units.

	Estimate
Total housing units	385,106
Total occupied housing units	261,735
Rental housing units	74,266
Owner units with a mortgage	92,080
Owner units without a mortgage	91,604
Vacant housing units	123,371
Vacant due to seasonal/recreational/occasional use	97,709
Homeowner vacancy rate	2.8%

Rental vacancy rate	6.8%
Source:	2016 ACS, Table DP04

Table 2. Housing in Lee County.

The relationship between household size and the number of bedrooms in housing units is a key component of the housing profile of any community. Larger families necessitate more bedrooms, essentially eliminating smaller housing units as an option. Table 3 presents the share of households by household size in Lee County. The data show a dominance of 2-person households across the County at 105,136, followed by 1-person households at approximately 74,454 1-person households. Larger household sizes with 3 or more persons represent a smaller share of total households.

Household size	Estimate
1-person household	74,454
2-person	105,136
3-person	28,433
4-person	21,547
5-person	9,296
6-person	4,813
7 or more	2,164
Source:	2016 ACS, Table B11016

Table 3. Household size

When assessing the number of bedrooms available in housing units, housing stock in Lee County mirrors trends seen at the national level. As referenced in Table 4, a majority of housing units include either two bedrooms (134,923 units) or three (175,032 units) in 2016. The combination of both two- and three-bedroom units represents 80% of all housing units in Lee County. Larger units with four or more bedrooms represents only 10% of all housing units in the County. While this proportional share of two and three-bedroom units is not unique, it does represent a challenge for larger families needing more than 3 bedrooms.

Between 2014 and 2016 the combined share of two- and three-bedroom apartments dropped by a marginal degree, from 82.8% of all housing units to 80.5% (a difference of 2.3%). This difference is reflected in a greater share in units with fewer bedrooms (units with 1 or fewer bedrooms changed from 7.7% to 9.0% of total housing units) and units with more bedrooms (units with 4 or more bedrooms changed from 9.5% to 10.5%). While it is difficult to make conclusive statements on housing product based on the marginal shifts in overall share of housing units, this adjustment in inventory away from mid-sized units may reflect oversaturation in that product type, with the private market recognizing the need for alternative housing arrangements for both smaller and larger families.

Bedrooms	2016 Estimate	2016 Percent of Total	2015 Estimate	2015 Percent of Total	2014 Estimate	2014 Percent of Total
No BR	4,479	1.2%	4,786	1.3%	2,823	0.8%
1 BR	30,141	7.8%	24,432	6.4%	26,077	6.9%
2 BR	134,923	35.0%	143,481	37.9%	140,503	37.4%
3 BR	175,032	45.5%	164,004	43.3%	170,443	45.4%

4 BR	34,698	9.0%	36,486	9.6%	31,597	8.4%
5+ BR	5,833	1.5%	5,871	1.5%	4,245	1.1%
Source:	ACS 2016, Table B25041		ACS 2015, Table B25041		ACS 2014, Table B25041	

Table 4. Count of housing units by number of bedrooms.

In Figure 1, the same data discussed above is presented in chart form, to better provide an indication of shifts over time in housing inventory in Lee County.

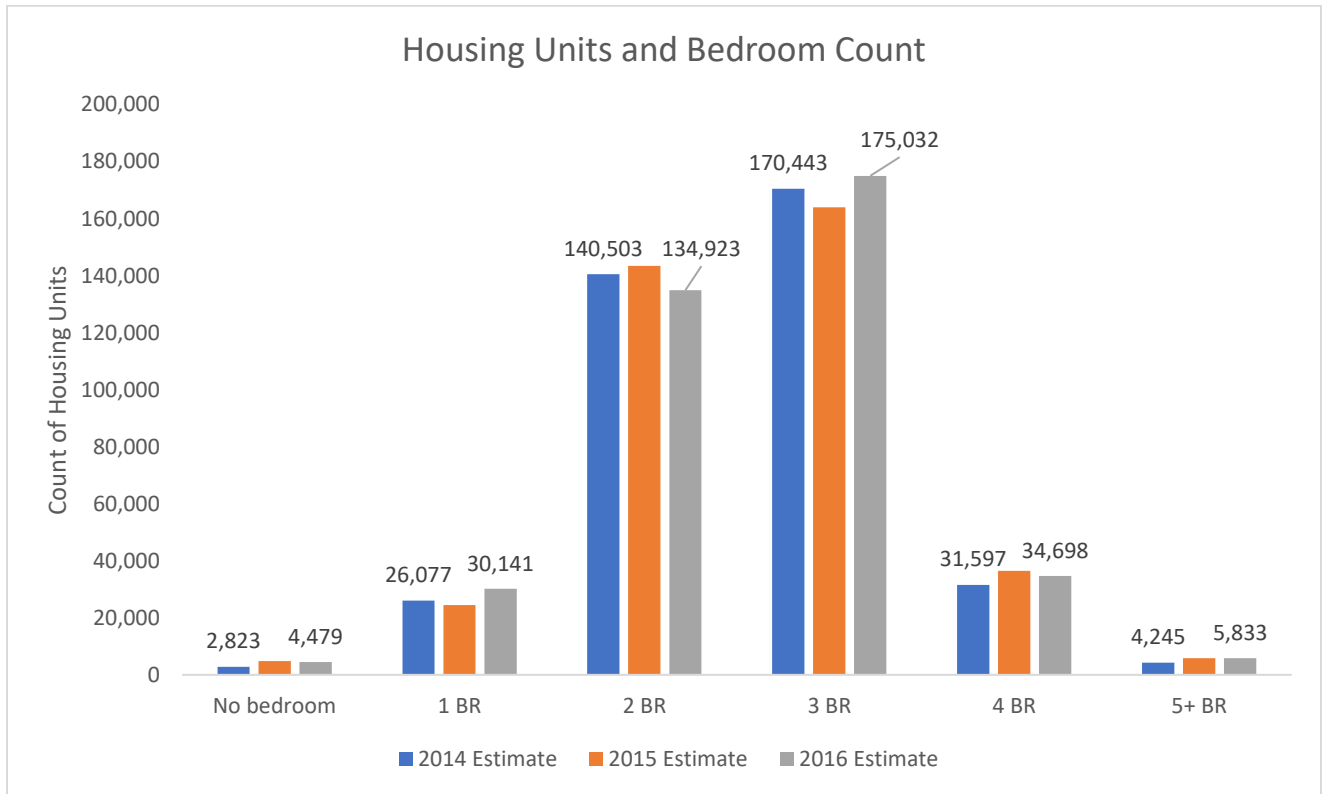


Figure 1. Count of Housing Units by Number of Bedrooms.

The age of housing is also important as a rough measure of housing quality, as well as the general strength of the housing market. A high volume of unit development indicates a robust economy with significant demand for housing.

Table 5 presents data on the count of housing units by the estimated year the unit was built. The pattern in Lee County is clear: development increased dramatically starting in the 1970s (14.4% of housing units were built between 1970 and 1979), and peaks in the 2000s (31.2% of housing units were built between 2000 to 2009).

Estimated Year Unit Was Built	Estimate	Percent
2014 or later	8,890	2.3%
2010 to 2013	9,605	2.5%
2000 to 2009	120,274	31.2%
1990 to 1999	69,873	18.1%
1980 to 1989	86,133	22.4%

1970 to 1979	55,483	14.4%
1960 to 1969	19,013	4.9%
1950 to 1959	10,109	2.6%
1940 to 1949	2,372	0.6%
1939 or earlier	3,354	0.9%
Source:	2016 ACS, Table DP04	

Table 5. Age of Housing Stock.

Given the dominant development rate in the 2000s, it is worth examining where these units were built in the County. Figure 2 presents the spatial distribution of housing units built between 2000 to 2009 as a share of the total units in each census tract, as well as the total count of households with a commute over 60 minutes. Data on commute time is included as a point of comparison because the relationship between housing location and transportation costs often makes a substantial difference for household budgets.

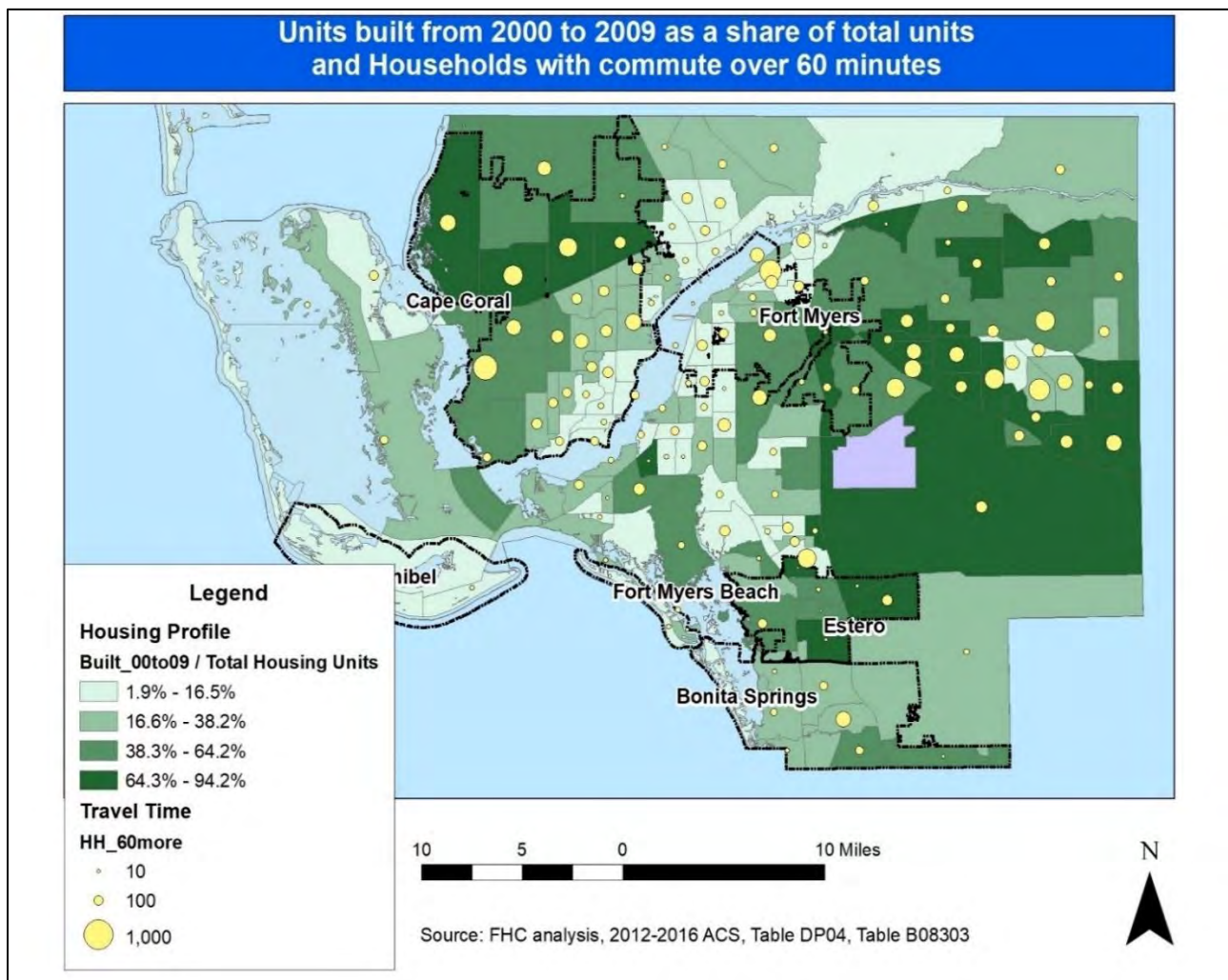


Figure 2. Number of units built between 2000 to 2009 as a share of total units.

Upon examining Figure 2, it becomes apparent that between 2000 and 2009, primarily suburban and exurban communities were developed, with construction concentrated in communities far away from historic downtowns, near Interstate-75, or along the Caloosahatchee river. The relationship between this

suburban development pattern and commuting is also apparent. Areas with the most development between 2000 and 2009 are also home to a disproportionate share of the County's households with long commutes.

Given the suburban and exurban development patterns discussed above, it is worth further exploration of the relationship between housing and transportation costs in Lee County's housing profile. The Center for Neighborhood Technology (CNT) has developed a H+T index (housing and transportation). The H+T index indicates the level of affordability for a neighborhood by providing a percentage estimate of the average combined cost of housing and transportation. The benchmark for affordability for housing and transportation costs is no more than 45% of household income. The index calculates total transportation costs by adding auto ownership, auto usage and public transit usage.

Figure 3 presents H+T index values, as calculated by CNT, for each census tract in Lee County for households earning 80% of AMI. Darker shades indicate areas with higher costs for housing and transportation, and lighter shades indicate areas with lower combined costs. The data shows a concerning picture of the combined costs of housing and transportation in the County. Areas on the coast and communities bordering Collier County are particularly housing and transportation cost burdened. The City of Bonita Springs has many neighborhoods with highly cost burdened households, likely due to the number of households working in Collier County.

Communities in Lee County with the lowest combined costs of housing and transportation are composed primarily of City of Ft Myers census tracts, neighborhoods in Lehigh Acres, and a few census tracts in North Ft Myers. The common characteristic between these neighborhoods is density of housing, and relatively proximate access to job markets and major road networks. These communities also typically feature lower-income households that may be working primarily in service sector jobs close to home.

H+T Index for 80% AMI Households, Lee County

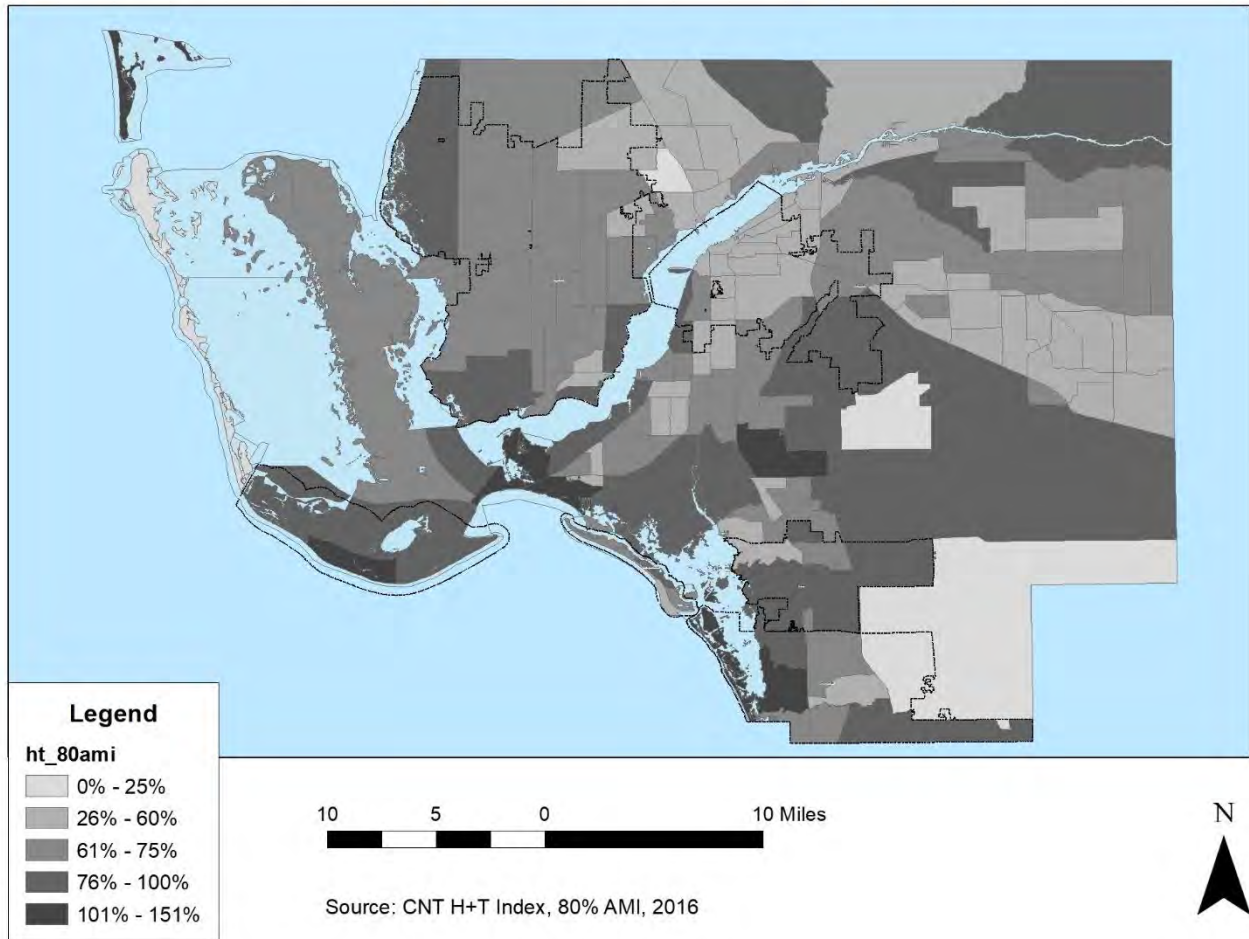


Figure 3. CNT H+T Index values for 80% AMI households.

In addition to the number of bedrooms and age of housing, it is important to review the overall distribution of housing types in Lee County. Table 6 presents data on the type of structure by tenure (renter or owner). As is typical for many rural to suburban communities in Florida, Lee County’s housing is dominated by single family detached housing (61.2% of all occupied units). Even in renter-occupied units, single family detached housing represents 40.5% of the total. Structures with 10 or more apartments represents the second largest source of occupied units, representing 12.3% of all occupied units, 7.1% of owner-occupied units, and 24.5% of all renter-occupied units. Owner-occupied units in structures with 10 or more units are typically condominium units.

	Total occupied units	Owner-occupied units	Renter-occupied units
1, detached	61.2%	69.9%	40.5%
1, attached	7.4%	6.5%	9.6%
2 apartments	3.4%	1.2%	8.6%
3 or 4 apartments	3.4%	2.7%	5.2%

	Total occupied units	Owner-occupied units	Renter-occupied units
5 to 9 apartments	4.7%	3.5%	7.3%
10 or more apartments	12.3%	7.1%	24.5%
Mobile home	7.7%	9.2%	4.3%
Source:	2016 ACS, Table S2504		

Table 6. Units in Structure by Tenure Type

In Figure 4, the same data discussed above is presented in chart form to provide a visual representation of the overall share of structure types by tenure status.

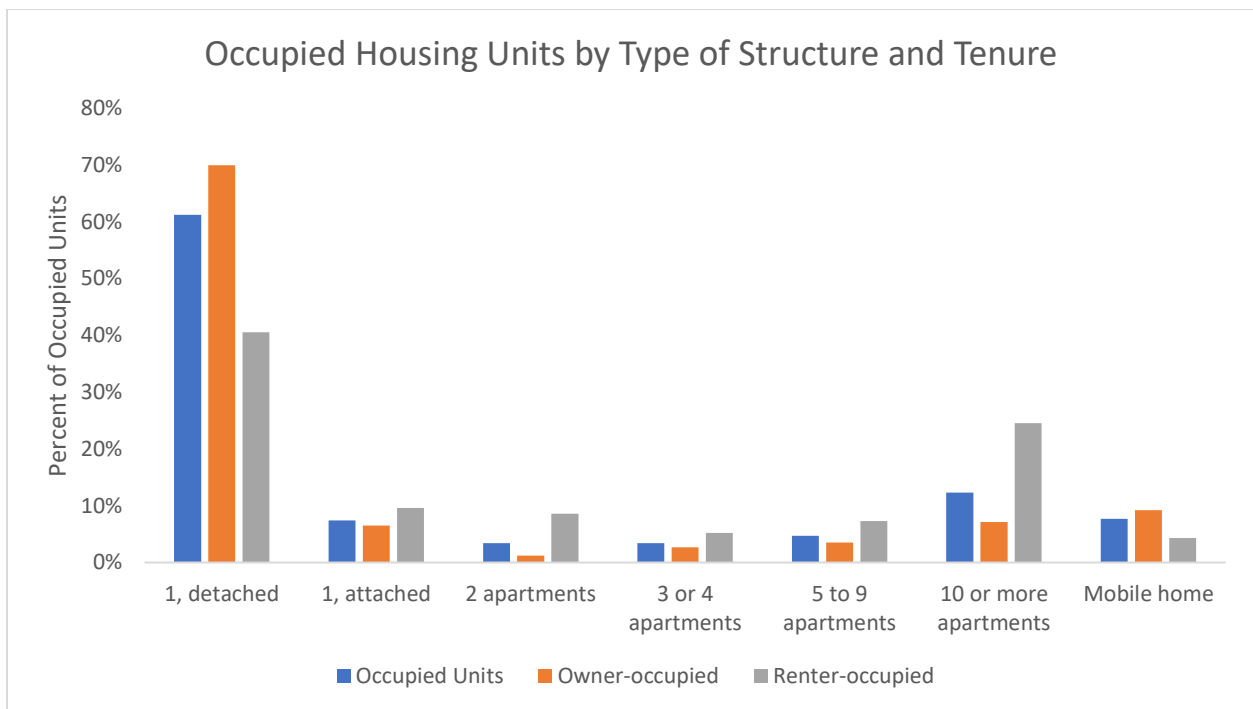


Figure 4. Percentage of Occupied Housing Units by Units in Structure and Tenure Type.

Single family detached housing is a considerably more expensive housing option, on a per-unit basis, than high-density multi-family apartment buildings. A community dominated by single family homes faces a hard barrier to expanding the supply of housing. In communities with a serious shortage of available units, persons will seek to crowd into available rooms. In Lee County, 97.1% of all occupied housing units in Lee County have under 1 occupant per room (2016 ACS, Table DP04). This figure on occupants per room can be considered a proxy measure of overcrowding in housing, which in turn is a function of housing costs and lack of access to attainable housing.

Figure 5 maps the share of all occupied housing units by census tract with 1.5 or more occupants per room, with darker shades representing higher concentrations of such housing units. It appears Lehigh Acres, the City of Ft Myers, and communities on the border between Lee County and Collier County are experiencing high rates of overcrowding.

The facts presented above, from overcrowding conditions to the dominance of single family detached housing in the built environment, present a challenge to Lee County in its efforts to address housing costs. The County’s ability to lower housing costs and increase the supply of attainable housing units for working families is fundamentally restricted by the existing built environment and its focus on single family detached housing in suburban and pre-platted communities.

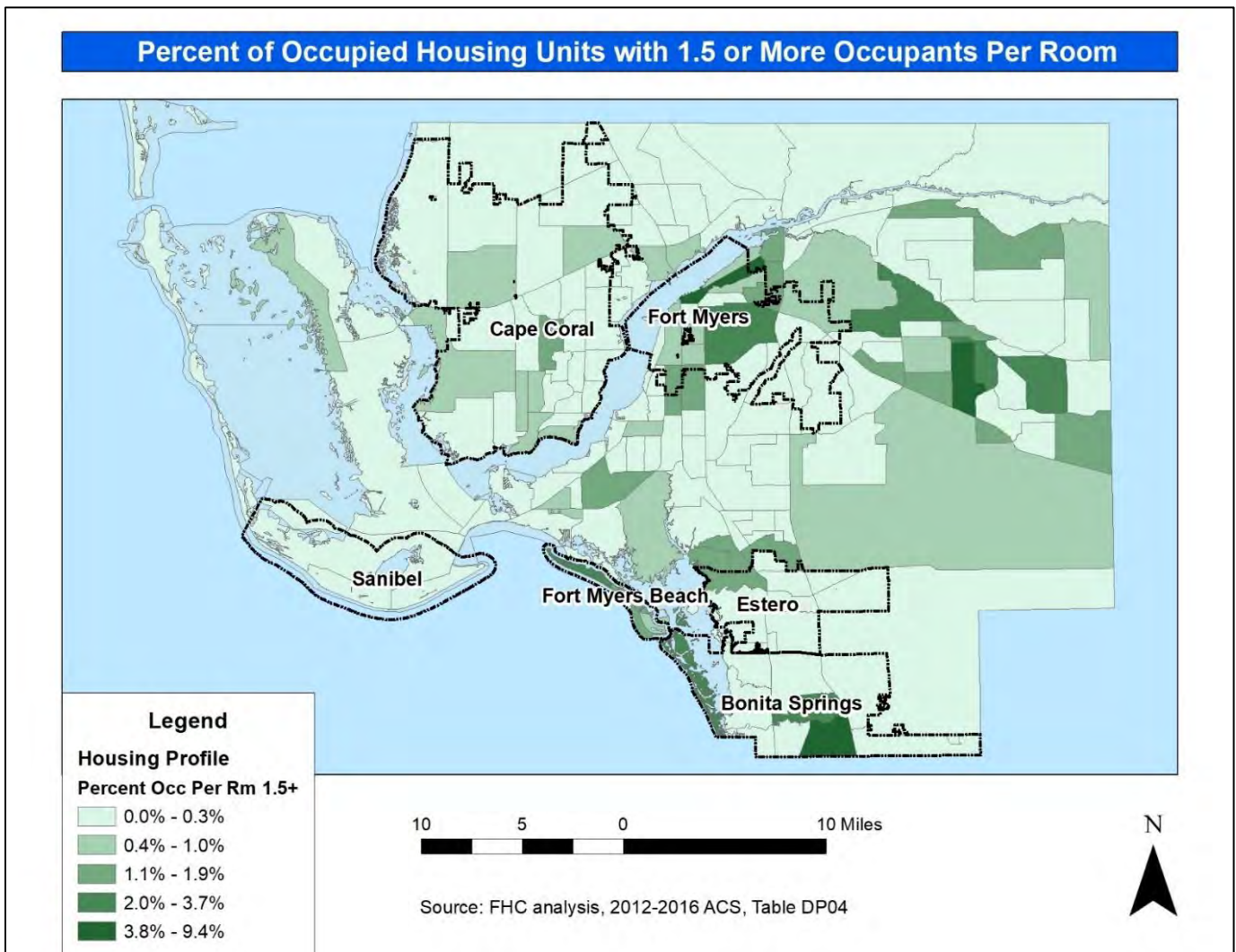
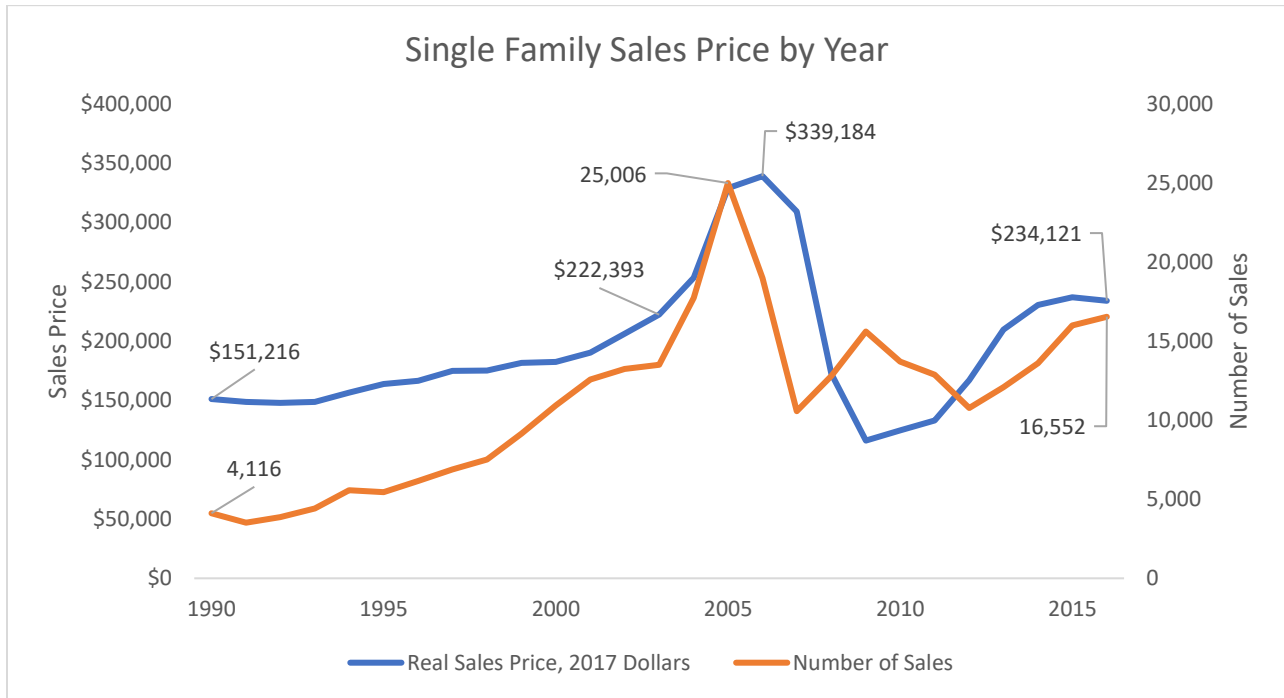


Figure 5. Percent of Occupied Housing Units with 1.5 or More Occupants Per Room.

Finally, given the relative importance of single family homes in Lee County’s built environment, it is important to review sales data for this product type. Figure 6 shows county property appraiser data on average single-family home sales by year, starting from 1990 and ending with data from 2016. All sale prices are adjusted for 2017 values. The data shows a dramatic increase in sale prices and sale volume in the years prior to the great recession, with prices peaking in 2006 at \$339,184, followed by a plummet in

sales volume and prices in the years immediately following. Today, sale prices have not reached the heights seen during the housing boom, only barely exceeding prices seen in 2003. Starting in 2012 the volume of sales began increasing, from 10,772 to 16,552 total sales in 2016 (an increase of 53.6%). Finally, there was a nominal decline in total sale price between 2015 and 2016, dropping from \$236,981 to \$234,121. When considering housing cost burdens for owner households, any flattening of cost inflation benefits owner households.



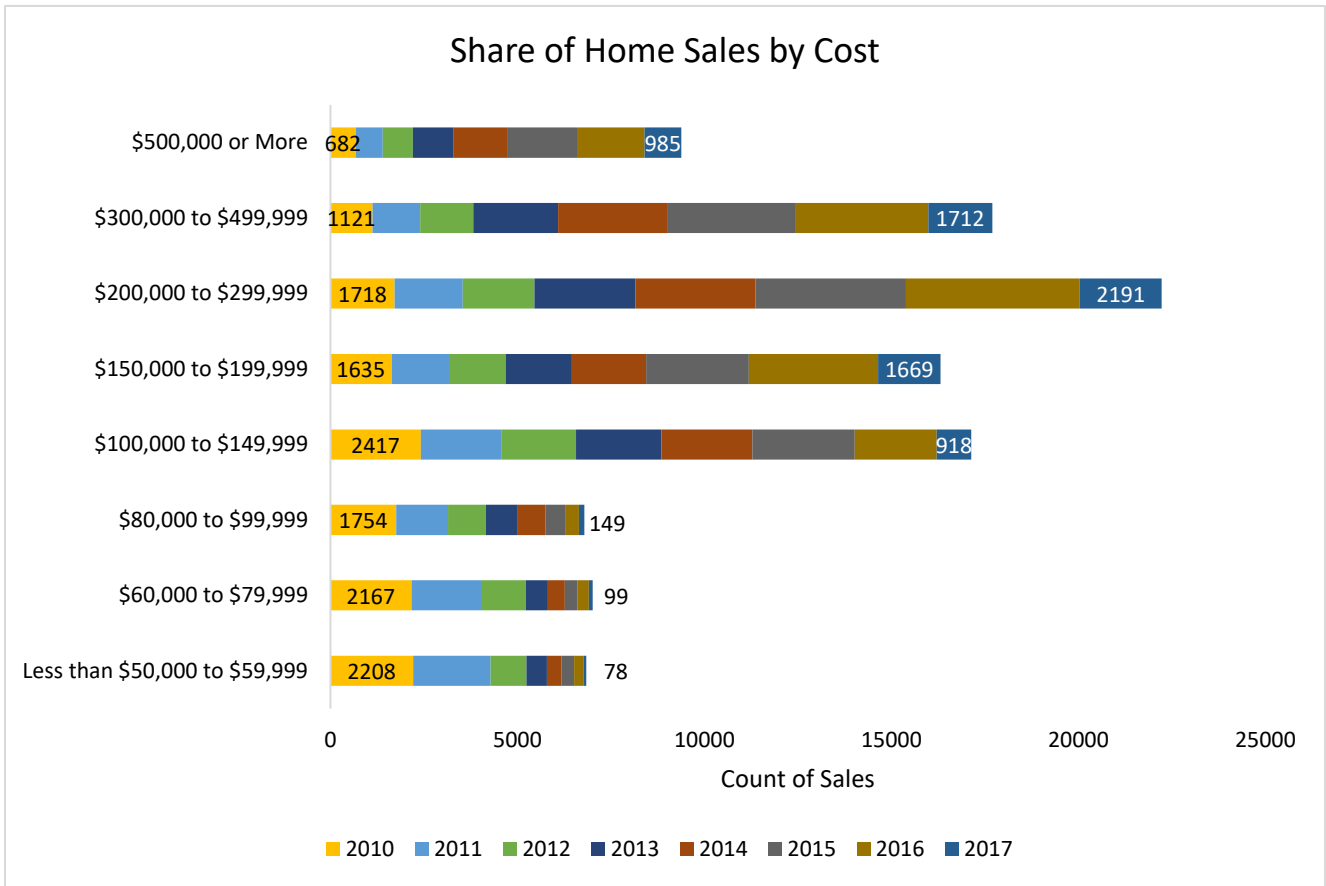
Source: Shimberg Center for Housing Studies, County property appraiser tax rolls and Florida Department of Revenue – Sales Data Files.

Figure 6. Single Family Sales Data by Year.

The data presented above is based on an average across all sales. This conceals trends in key sales price categories relevant to this study’s target population with incomes between 80 to 120% AMI. An affordable home price for an 80% AMI 3-person household is estimated to be \$159,800 (based on a 4% annual interest and 3% down payment).

Figure 7 presents data on the total number of sales by sales price category since 2010 through 2017. For sales priced between \$100,000 and \$200,000, there were a total of 2,587 home sales in 2017, compared to 4,888 sales over \$200,000. It is also notable that the share of moderately-priced homes sold has dropped since 2010. For instance, the total number of sales in the \$100,000 to \$149,999 category has shrunk from a total of 2,417 in 2010 to 918 in 2017.

The data demonstrates a consistent theme in this housing profile: the attainable housing workforce population faces considerable cost concerns in the single-family home market due to an insufficient supply of available units in appropriate cost categories.



Source: Florida Department of Revenue Sales Data Files, accessed 4/24/18.

Figure 7. Share of Home Sales by Cost

Income Profile

Household income plays a crucial role in the relationship between housing costs and housing cost burdens. This section of the analysis reviews data on household income in Lee County and municipalities within it. The geography of income also plays a role in the housing landscape of any community, and Lee County is no exception. Depending on the location, median household income varies dramatically. This report focuses on the relationship between income and geography in the cost burden profile, following the income profile described here.

As presented in Table 7, in 2016 the median household income in Lee County was \$52,909 across all occupied units. This equates to \$4,409 per month in gross income, or \$25.35 per hour. These figures shift dramatically, however, depending on tenure type of the occupied unit. For renter-occupied housing units, median income drops to \$38,325 (a drop of 28%), with the median hourly wage dropping to \$18.36. As expected, median household income in owner-occupied units is higher than the County figure overall.

Assuming a household should pay no more than 30% of its income on rent, households in all occupied housing units in Lee County should pay no more than \$1,470 in monthly housing costs to stay above the housing cost burden threshold. These figures shift for owner-occupied and renter-occupied housing units due to median household incomes by tenure type. In owner-occupied units, the affordable monthly housing cost is \$1,671. For renter-occupied units, the affordable monthly housing cost is \$1,065.

	Occupied Units	Owner-occupied	Renter-occupied
Median Household Income	\$52,909	\$60,160	\$38,325
Monthly income	\$4,409	\$5,013	\$3,194
Hourly wage	\$25.35	\$28.83	\$18.36
Monthly attainable housing cost	\$1,470	\$1,671	\$1,065
Source:	2016 ACS, Table S2503; FHC calculation of median hourly wage based on 2087 annual hours; FHC calculation of monthly affordable housing cost based on 30% income threshold.		

Table 7. Median Household Income by tenure, Lee County.

An alternative source for median household income is median household income at the metropolitan statistical area (MSA) geography. For Lee County, the MSA is the Cape Coral – Ft Myers area. This geography is broad, and disguises significant variation by location within the county.

Each year, the Florida Housing Finance Corporation (FHFC) publishes rent limits for the State Housing Initiatives Partnership (SHIP) program, identifying the median household income at the MSA level, and corresponding income limits by the number of persons in the household. According to Table 8, the median household income in the Cape Coral – Ft Myers MSA is \$63,700 in 2017, and a 2-person household making 80% of the MSA AMI earned approximately \$40,800 per year.

MSA Median	63,700
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Percentage Category	Income Limit by Number of Persons in HH				
	1	2	3	4	5
30%	13,400	16,460	20,780	25,100	29,420
50%	22,300	25,500	28,700	31,850	34,400
80%	35,700	40,800	45,900	50,950	55,050
120%	53,520	61,200	68,880	76,440	82,560
140%	62,440	71,400	80,360	89,180	96,320
Source:	FHFC 2018 SHIP Rental Limits				

Table 8. SHIP income limits by number of persons in HH.

In addition to AMI data, it is important to understand the share of households in the region that fall within particular income bands. Figure 8 shows data on the number of households by income band and tenure in Lee County. It should be noted that the data reported in Figure 8 is from the 2010-2014 CHAS data produced by HUD. Obviously, there is a meaningful lag in time between this data and the time of publication of this report. Out of 246,060 total households in the County, 52% (130,295) of them earn at or above the area median family income (AMFI). Of the 130,295 households earning at or above the AMFI, 79.5% of them are owner households, with the balance composed of renter households.

There are a total 115,765 households earning below the AMFI in Lee County, with renter households representing a majority (57.7%) of these poorer households. Of the low-income bands, households earning between 50 to 80% of AMFI represent the largest share of low-income households (36.5% of total low-income households). When combined with households earning between 80 and 100% of AMFI, 57.3% of low-income households are WI households.

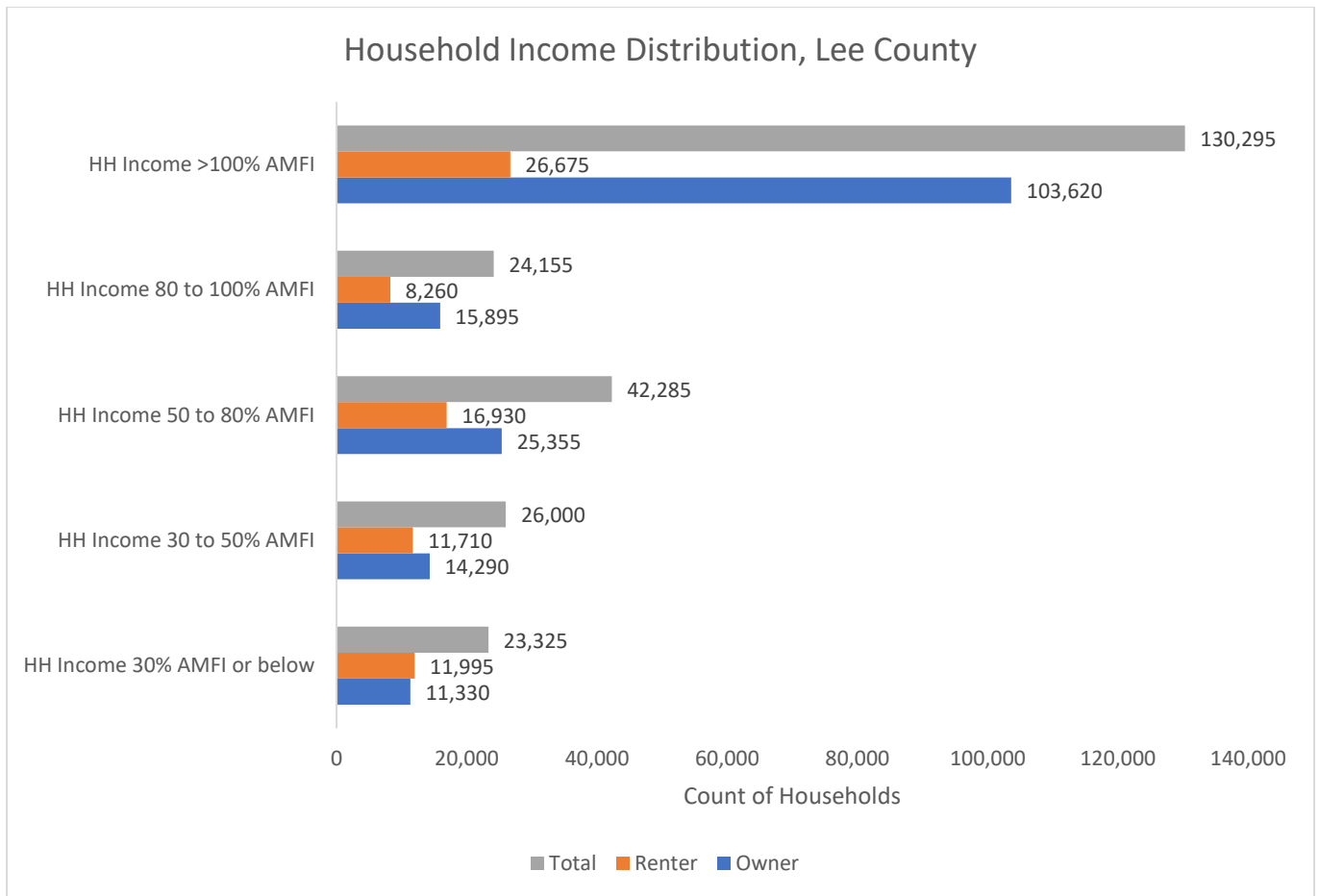


Figure 8. Household Income Distribution, Lee County.

Source: HUD CHAS 2010 – 2014.

Considering the target population of this report, it is valuable to examine typical incomes for entry-level workers across occupations in the County. Table 9 shows the average hourly wage by select occupations in the Cape Coral-Ft Myers MSA in 2016. The Annual Income figure is calculated at 40 hours per week, 52 weeks a year. Finally, the Monthly Housing Cost Threshold figure is calculated at 30% of monthly income based on the annual income for each occupation.

The average hourly wage shows considerable disparity between lower-paying occupations like retail sales, housekeepers, and retail sales, and higher-earning occupations like nurses, firefighters, and police. For the purposes of this report, the study population consists primarily of those higher earning occupations. That said, even entry level workers in the higher paying occupations face significant barriers to finding high quality affordable housing options, considering the HUD fair market rent (FMR) of \$911 per month.

Occupation	Hourly Wage	Annual Income	Monthly Housing Cost Threshold
Cashiers	\$8.83	\$18,366	\$460
Firefighters	\$20.62	\$42,890	\$1,072
Nurses	\$16.13	\$33,550	\$839

Housekeepers	\$9.04	\$18,803	\$470
Police	\$18.12	\$37,690	\$942
Retail Sales	\$8.91	\$18,533	\$463
Source:	FL DEO OES 2016, Cape Coral-Ft Myers MSA		

Table 9. Entry-Level Wages by Occupation, 2016

Cost Burden Profile

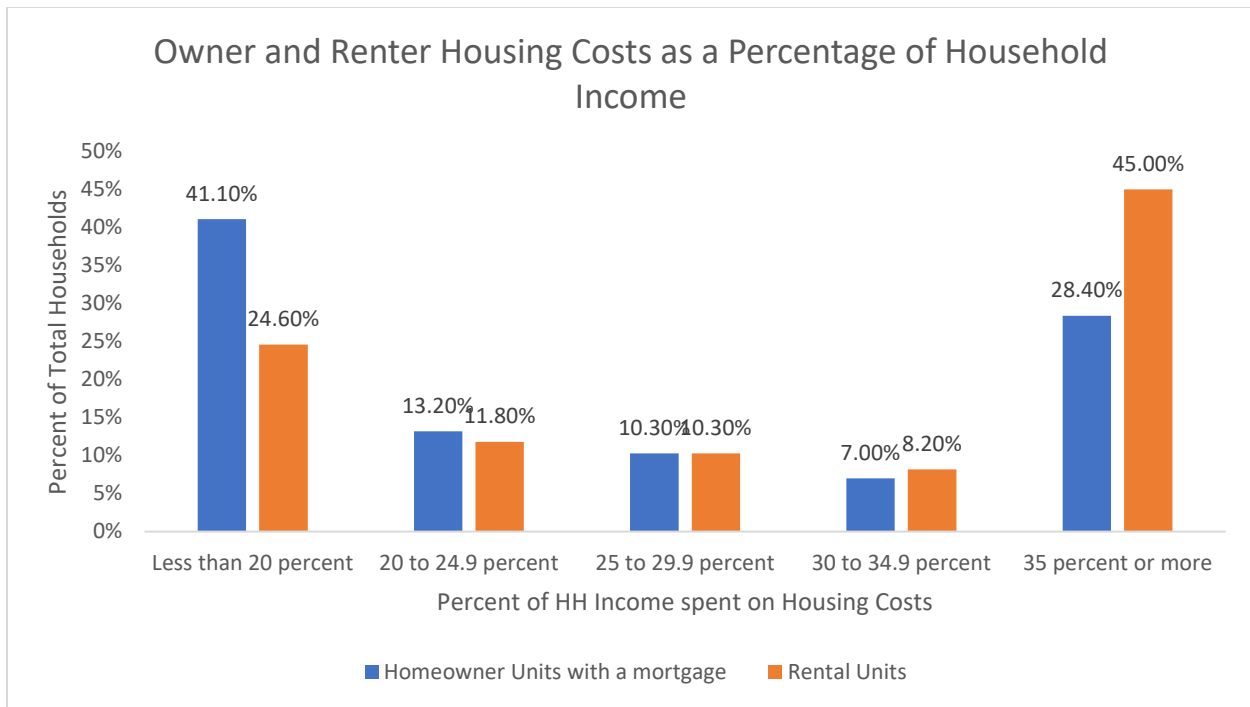
To this point, no data on the relationship between household income and housing costs has been examined. This section reviews rates of cost burden in Lee County. Table 10 presents data on the number of households, by tenure, and respective amount of income spent on housing within three bands of housing cost: between 0 and 30% of household income, 30-50%, and 50% or more of household income spent on housing. The figures show a marked distinction between owner and renter households. Only 33.4% of owner households are cost burdened, compared to 52.6% of renter households. Approximately 16.1% of owner households are severely cost burdened (spending more than 50% of income on housing), and 26.2% of renter households are severely cost burdened.

	Total	Amount of income spent on Housing		
		0-30%	30-50%	50% or more
Owner	194,723	129,719	33,628	31,376
Renter	80,379	38,065	21,260	21,054
Total	275,102	167,784	54,888	52,430
Source:	FHC tabulation of PUMS, 2016			

Table 10. Amount of income spent on housing, Lee County.

Figure 9 shows the percentage of households by tenure type and the share of household income spent on housing costs in Lee County. The vertical axis shows the percent of all households falling within each share of income spent on housing (the horizontal axis). For purposes of this analysis, households spending more than 30% of household income on housing costs are considered cost burdened.

The data demonstrates a definite pattern: a disproportionate number of households are either spending a small share of income (the left side of Figure 9) on housing or spending a large share of income on housing (the right side). Further, homeowners in general are in a superior financial position when it comes to housing cost, with 41.1% of all owner households spending less than 20% of household income on housing costs. On the other hand, 45% of renter households spend 35% or more of their income on housing. This is likely explained by the lower overall income for renter households in the County, compared to owner households, as discussed in Table 7. Median Household Income by tenure, Lee County. This dynamic may also be explained by an oversupply of owner units, considering the share of renter households in Lee County.



Source: 2016 ACS, Table DP04.

Figure 9. Owner and Renter Housing Costs as a Percentage of Household Income.

When considering these same figures over time, presented in Table 11 (for owners) and Table 12 (for renters), owner households continue to enjoy lower rates of housing cost burden compared to renter households. In fact, the situation is getting worse for renters over time, with the share of renters spending more than 35% or more of household income on housing rising from 43.8% of renter households in 2013 to 45% in 2016. Over the same time period, owner households spending 35 percent or more of income on housing dropped from 31.5% to 28.4%.

	Selected Monthly Owner Costs as a Percentage of Household Income (with a mortgage), by Year			
	2013	2014	2015	2016
Less than 20 percent	36.1%	38.3%	35.4%	41.1%
20 to 24.9 percent	15.1%	13.2%	14.6%	13.2%
25 to 29.9 percent	9.6%	11.7%	11.3%	10.3%
30 to 34.9 percent	7.8%	8.0%	10.8%	7.0%
35 percent or more	31.5%	28.8%	27.9%	28.4%
Source:	ACS 2012-2016, Table DP04			

Table 11. Selected Monthly Owner Costs as a Percentage of Household Income, by Year.

	Gross Rent as a Percent of Household Income			
	2013	2014	2015	2016
Less than 20 percent of household income	20.8%	23.5%	22.4%	24.6%
20 to 24.9 percent	13.3%	13.4%	14.2%	11.8%
25 to 29.9 percent	12.4%	11.5%	11.0%	10.3%
30 to 34.9 percent	9.8%	10.3%	7.2%	8.2%
35 percent or more	43.8%	41.4%	45.2%	45.0%
Source:	ACS 2012-2016, Table DP04			

Table 12. Gross Rent as a Percent of Household Income, by Year.

Figure 10 presents the same data for renter households as presented in Table 12. Visual representation of the data indicates an overall heightening of inequality between renter households with the means to afford rent and households unable to afford rent between 2013 and 2016. This growing unequal access to affordable housing in the rental market likely reflects an inflationary environment for rents in Lee County, and a chronic undersupply of rental units affordable to lower-income households.

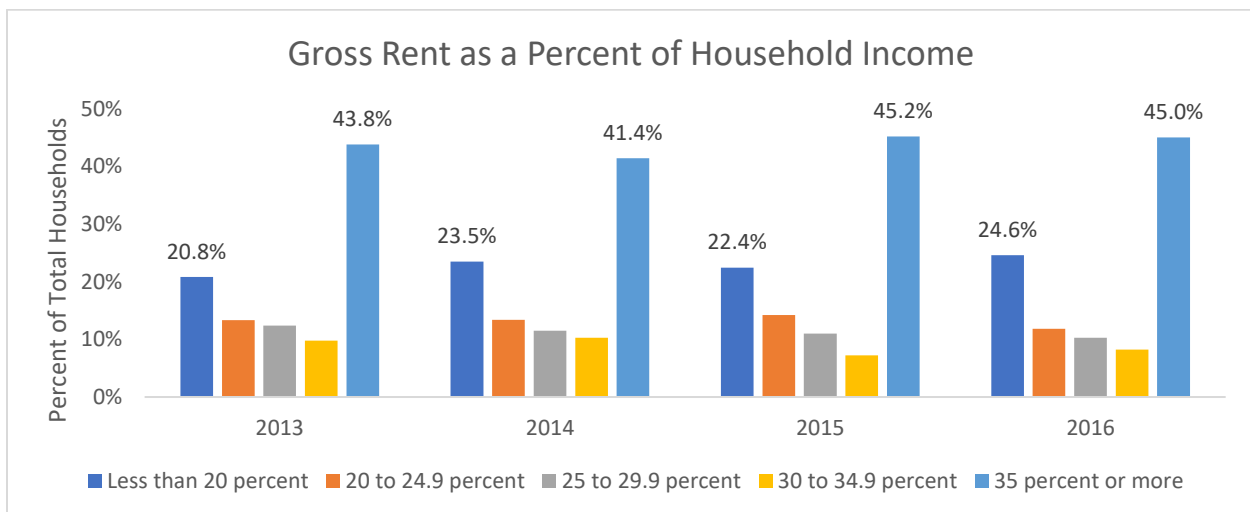


Figure 10. Gross Rent as a Percent of Household Income.

The data discussed above presents housing cost burdens with no spatial reference. Figure 11 shows census tracts where the median monthly rental cost exceeds the median monthly renter household income. These census tracts - totaling 90 of 165 census tracts in Lee County (54% of the total) – are considered unattainable rental markets due to the mismatch between median renter incomes and median renter costs. The map also displays proportional circles based on the total number of renter households in the census tract. The data shows a clear relationship between high concentrations of renter households and unattainable rental housing options.

This same exercise was executed for owner units. The result was a single census tract in Lee County where median monthly owner costs exceed 30% of median owner monthly income.

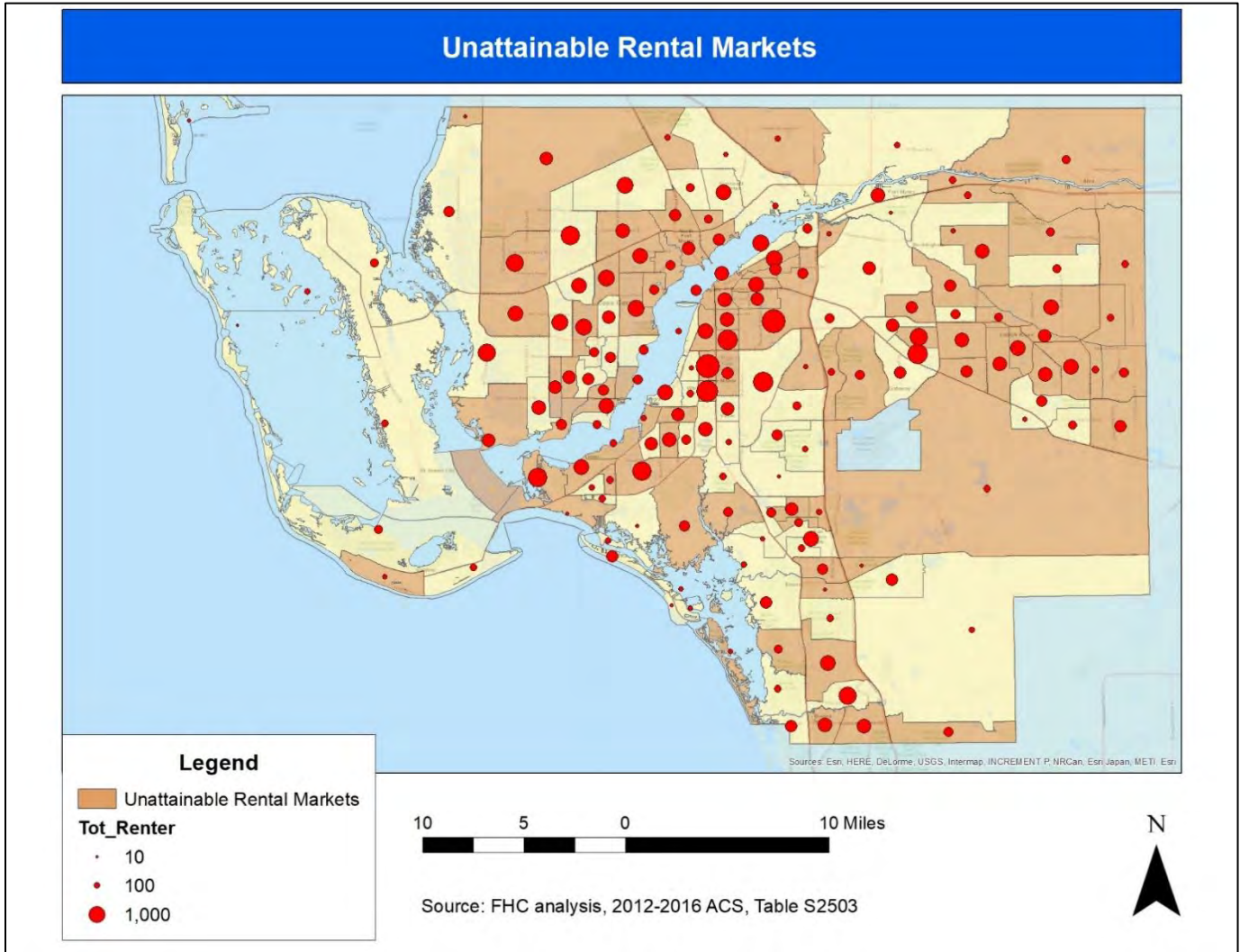


Figure 11. Census tracts where median monthly renter costs exceed 30% of median monthly renter income, and total renter households by census tract.

Using the unattainable rental markets identified in Figure 9, Table 13 below compares data between all census tracts in Lee County and all of the unattainable rental market census tracts. Three points of data are compared: average vacancy rate of occupied housing units, the average # of renter HHs across all census tracts, and the average household income. These data were selected because they are critical components of housing supply and demand – lower vacancy indicates demand for housing, the number of renter households indicates demand for rental units, and household income indicates the degree to which households are able to afford housing.

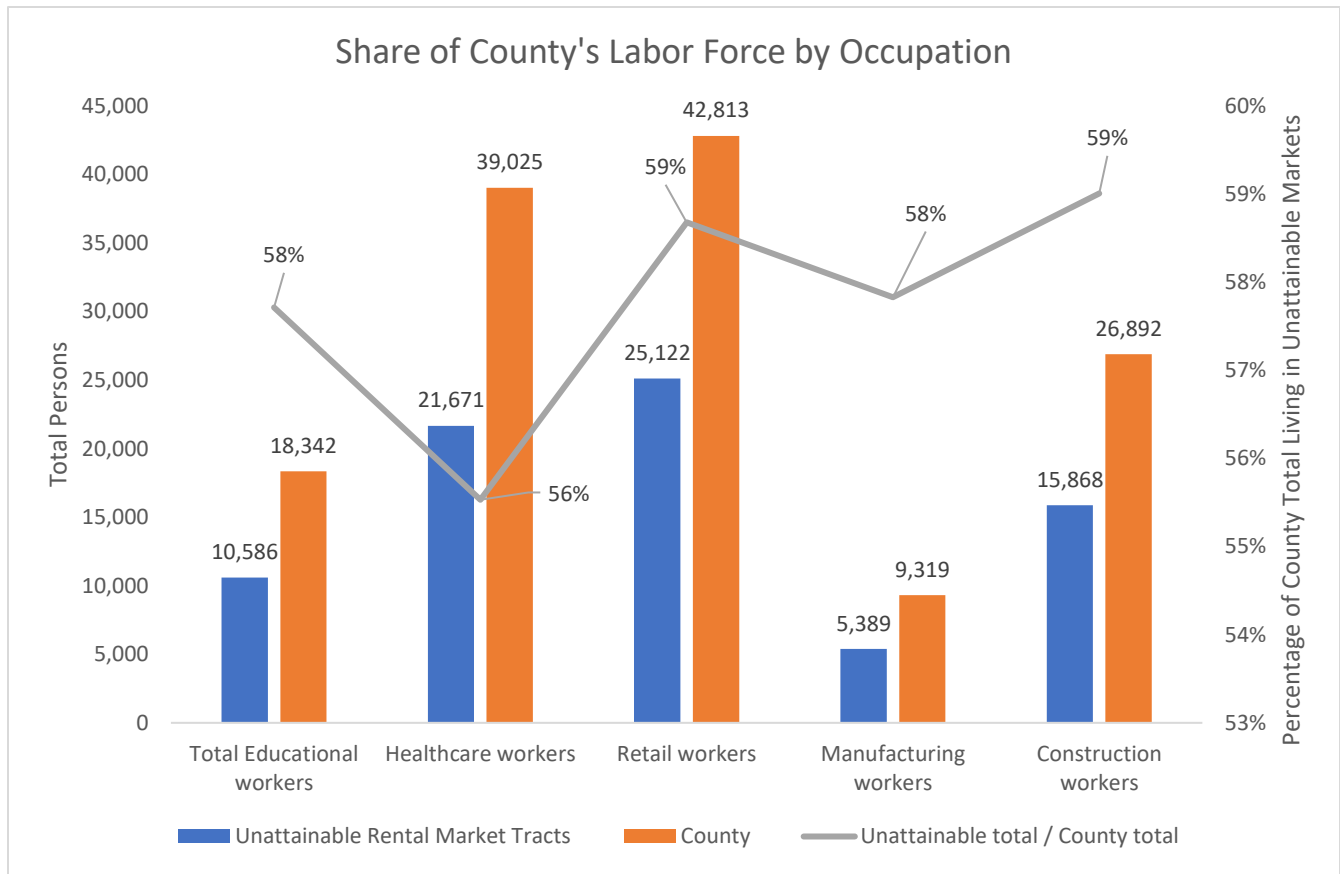
The figures demonstrate that compared to the County overall, households in unattainable rental markets contend with lower vacancy rates, higher concentrations of renter households, and lower average household incomes.

	Average Vacancy	Average # of Renter HHs	Average HH Income
Unattainable rental market tracts	27.86%	561.36	\$66,153
All County tracts	30.11%	485.53	\$71,539
Unattainable tracts: County tracts ratio	92.52	115.61	92.47
Source:	2012-2016 ACS, Table DP04; Table S1901		

Table 13. Comparison of all County tracts to unattainable rental tracts only.

Given the fact that there is a mismatch between renter housing supply and demand in the unattainable rental markets tracts, it is worth exploring in more detail the populations living in the two comparison regions. As a final analysis of the unattainable rental markets compared to the County overall, Figure 12 shows the total number of workers by occupation in the County overall (the bar in red) compared to the unattainable rental market's share of workers by that occupation (the bar in blue). Figure 12 also includes the share of total population working in each occupation that also live in unattainable rent markets.

The analysis demonstrates that, in rental markets facing constricted rental unit supply and lower average household incomes, education, healthcare, retail, manufacturing, and construction workers are overrepresented in the unattainable rental markets (ranging from 56% to 59% of the total). This share of each occupation exceeds the share of unattainable census tracts to the total Census tracts in the county, indicating disproportionate dependence on unattainable rental markets in the select occupations.



Source: ACS 2012-2016, Table S2403.

Figure 12. Share of County's Labor Force by Occupation.

It is important to examine absolute numbers related to supply-demand characteristics in the rental market across Lee County overall. Figure 13 is a cross-tabulation of two sets of data: the total number of renter occupied units by gross rent (in red), and the total number of renter occupied units by household income. When paired together, the data provides a better understanding of the supply of rental units affordable to renter households in each income band. In a perfect scenario, where supply equals demand, the two data sets would be equivalent.

The data demonstrates a definite shortage of attainable rental units for low income renter households (those making below 50% of AMI), particularly for those making under \$25,000 per year annually. The picture improves for higher income renter households, those making over \$25,000 annually.

The data represented in the supply-demand analysis tracks trends over a 5-year time period between 2012 and 2016. It is reasonable to assume, given market conditions, that the rental market has only tightened for lower-income households and for workforce households earning between \$50,000 to \$75,000 per year.

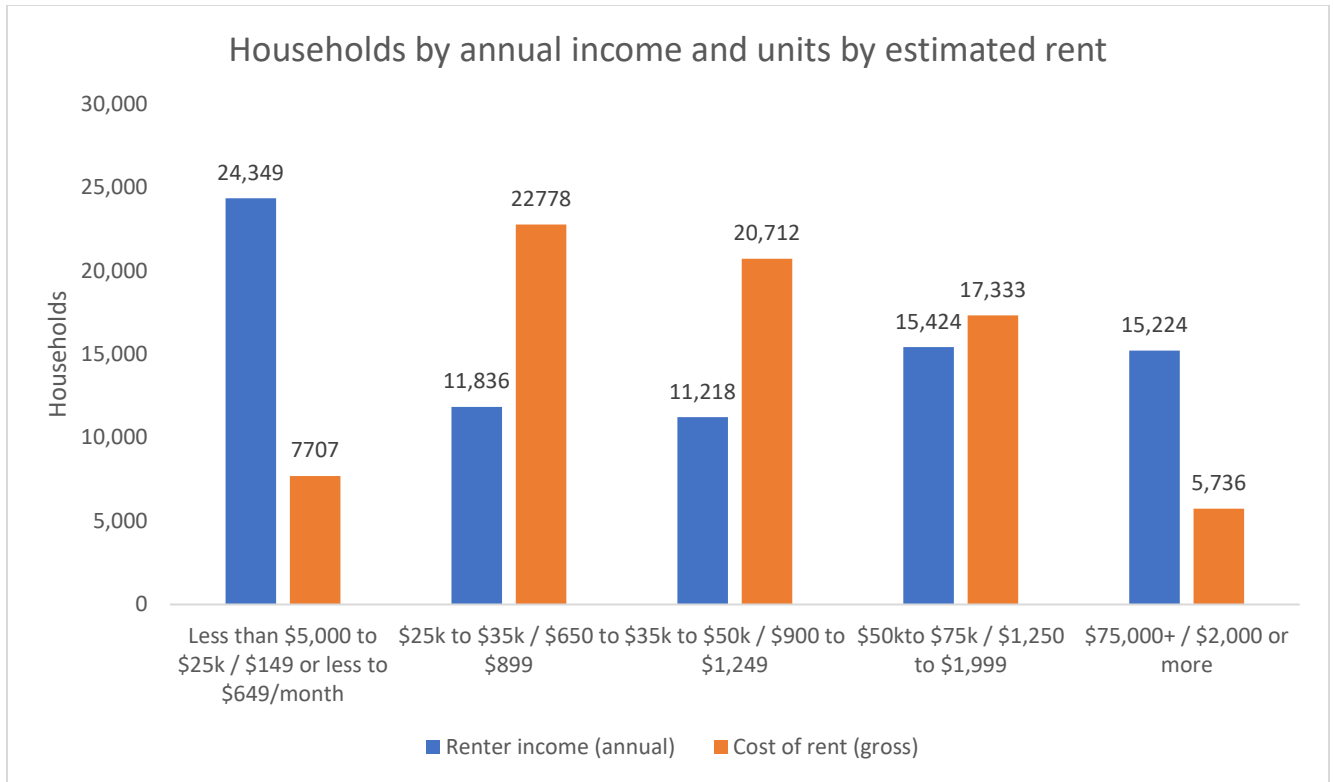


Figure 13. Renter housing units by household income and monthly rent categories.

Source: ACS 2016, Table B25118; Table B25063.

In order to further explore the relationship between supply and demand of attainable housing in the County, Figure 14 maps the spatial distribution, by census tract, of the total count of renter households earning between \$25,000 and \$50,000 per year (represented as dots on the map), and the total count of rental units costing between \$650 and \$1,200 per month. This rental cost band was selected because it represents approximately 30% of household income for those earning between \$25,000 and \$50,000 annually.

The map shows that Cape Coral, the City of Ft Myers, and areas in and around Lehigh Acres have high concentrations of both renter households in the selected income band, and a corresponding concentration of affordable rental units. Areas with the greatest spatial mismatch between supply and demand include census tracts in south Cape Coral, in Fort Myers along the Caloosahatchee River, and in North Ft Myers.

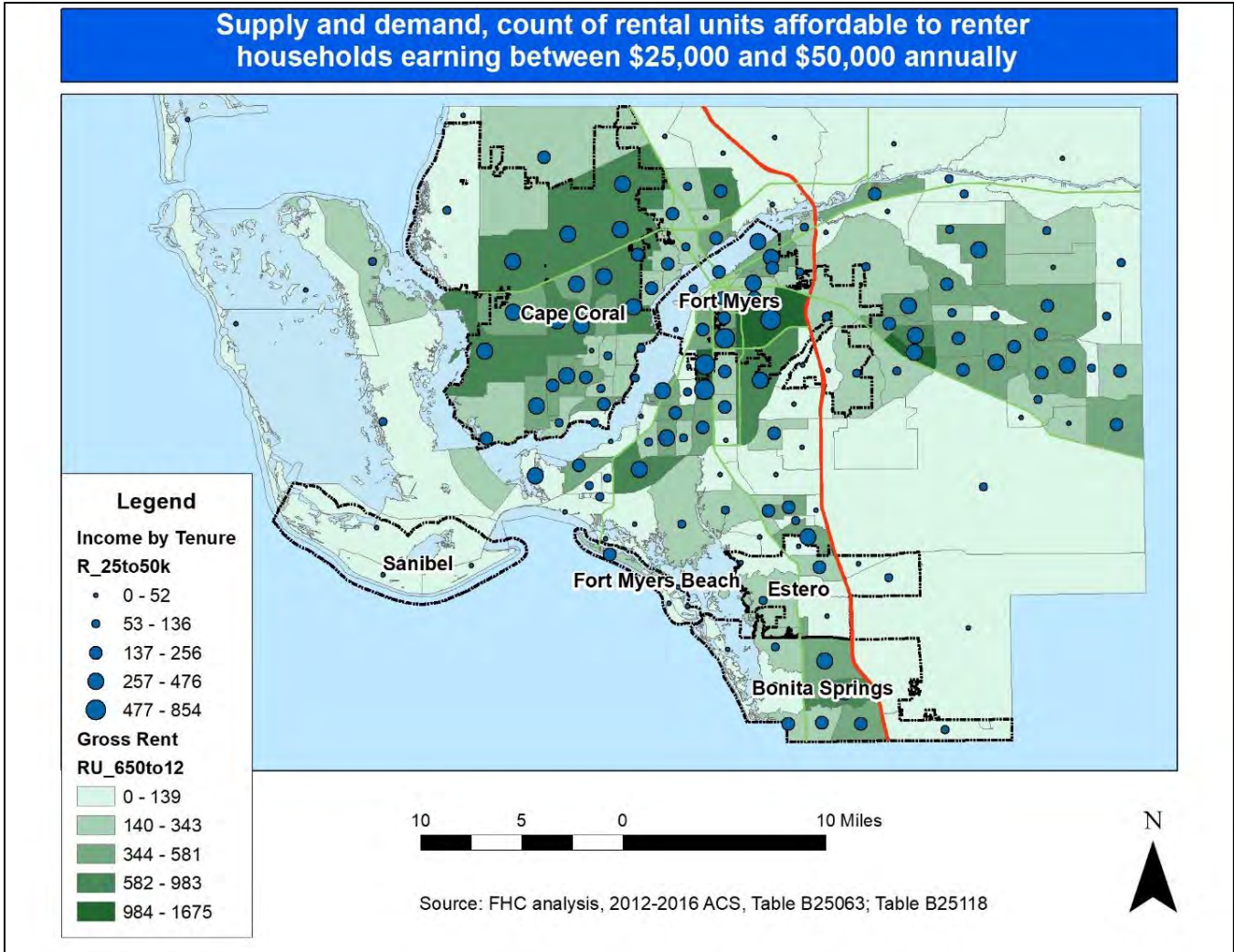
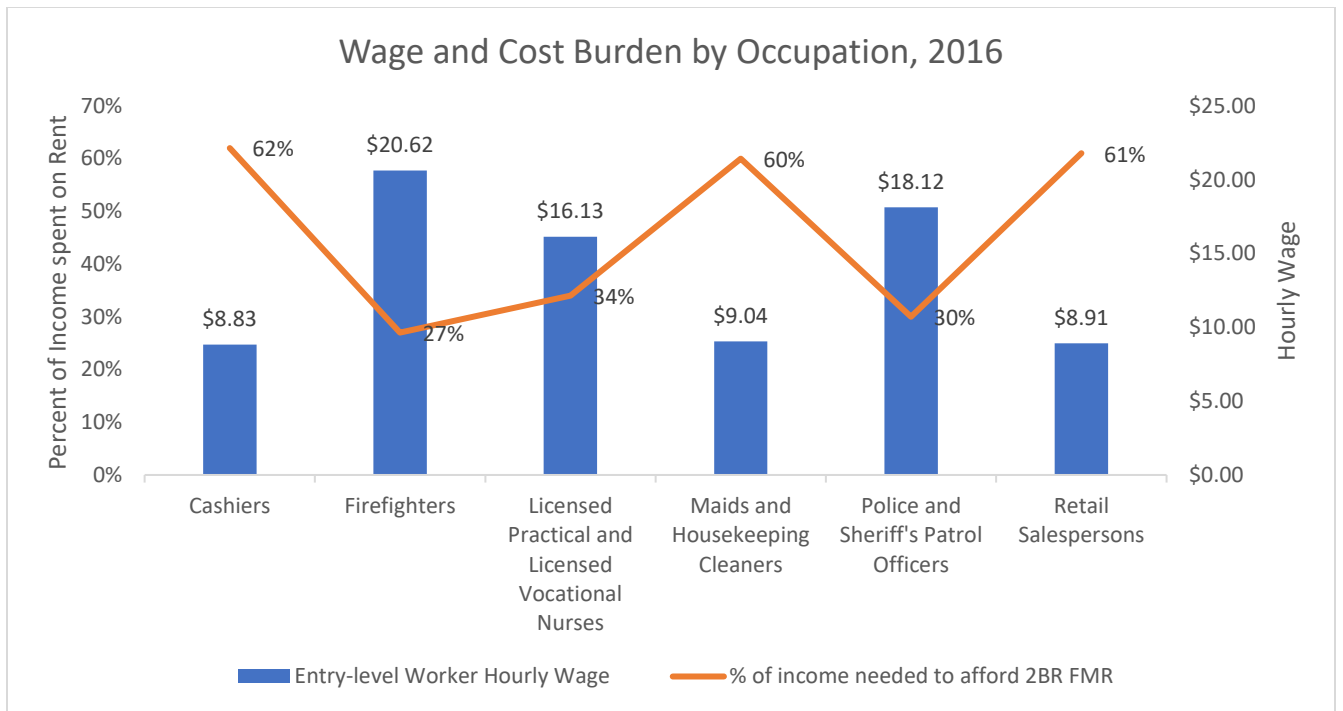


Figure 14. Supply and demand, renter units affordable to renter households earning between \$25,000 and \$50,000 annually.

A final component of the attainable housing landscape in Lee County is worker wages by occupation. Figure 15 shows two sets of data: the average hourly wage for workers by occupation in the Lee County MSA, and the percent of that wage a worker must spend on housing to afford a 2-bedroom apartment at Fair Market Rent (\$911 in 2016, according to HUD). Figures are for entry-level workers in the occupation, or those individuals having worked in the occupation for under three years. Occupations listed include waiters, firefighters, nurses, maids and housekeepers, police, and retail salespersons.



Source: Shimberg Center for Housing Studies, Wage and rent comparison by occupation.

Figure 15. Wage and Cost Burden by Occupation, by MSA.

The data shows a wide disparity in wages, depending on occupation. Firefighters and police officers have the highest average wages and are, overall, under the 30% threshold for housing cost. Cashiers, maids, and retail salespersons have the lowest average wage and suffer from similar degrees of housing cost burden, with all three occupations spending approximately 60% of income on rent. The final category is nurses, who have an above average hourly wage (\$16.13), but still face housing cost burden (34% of income must be spent on rent).

V. Existing attainable housing incentives and regulatory environment

Regulations and fee structures intended to mitigate the impact of new development on community infrastructure is a necessity for any community in the United States, including Lee County and the municipalities within it. These regulations include those enumerated in local land development codes and comprehensive plans, including impact fees, permissions in zoning codes, land use restrictions, rezoning requirements, and many other regulations at the local level. In aggregate, these regulations can, in some cases, impose a significant burden to the development of attainable housing for lower-income households.

Recognizing the regulatory burden that some codes and ordinances place on attainable housing development, local governments across Florida have adopted a number of incentive strategies to reduce regulatory burden, reduce cost of housing development, and promote development of attainable housing.

In order to gauge the environment for attainable housing in Lee County, this analysis reviews current incentive programs available in the County and provides estimates for impact fees for single family home construction across the study area. Multi-family construction is also subject to impact fees but are lower than fees for single-family construction.

Existing Attainable Housing Incentives

Lee County has incentive programs in place to promote and preserve affordable/workforce housing. Programs include:

- Expedited permitting. Lee County expedites permits for affordable housing development. Developers of affordable housing in unincorporated Lee County may apply to the Lee County Planning Section for a Certificate of Housing Affordability (CHA) that will entitle the developer to receive expedited permit processing on the affordable housing project. A copy of the CHA is attached to each county permit, and the CHA is entered into the County's permit tracking software. In total, these measures expedite affordable housing projects over both market rate housing and other types of project.
- Bonus density. Lee County allows greater density for affordable housing over the standard density range in each land use category, according to the Lee Comprehensive Plan. This density is only applicable in Intensive Development (8 bonus units per acre), General Interchange (8 bonus units per acre), Central Urban (5 bonus units per acre), and Urban Community (4 bonus units per acre) zoned areas.
- The allowance of affordable accessory residential units in residential zoning districts (Lee Plan Sec. 34-1177. Accessory Apartments). Lee County permits accessory dwelling units (ADU) that are subordinate to a single family detached unit. Making the unit available for rent or lease is permitted. The floor area of the ADU may not exceed 50% of the principal dwelling unit's floor area. Finally, the minimum lot size for ADUs is 6,000 square feet, or the lot size requirements for the district in which the home is located.

The City of Ft Myers has incentive programs in place. Programs include:

- Expedited permitting. Affordable housing projects are expedited to a greater degree than other projects. The City of Ft Myers' local housing assistance plan (LHAP) incentive strategies report that

projects that receive expedited review typically take 2 business days to process, compared to approximately 21 days for other reviews.

- Modification of Impact Fees. The City waives water and sewer impact fees in the Lee County/Fort Myers Enterprise Zone (this region can be considered in the core downtown business district of the City of Ft Myers).
- Flexible lot configurations. Flexible lot configurations are not allowed by-right for affordable housing projects, but the community development department is empowered to encourage and allow the use of zero lot line, angled lots, and other lot configurations.
- Public land inventory. The City of Ft Myers updates a list of public land inventory every three years. On an annual basis, the City's real estate staff reviews City lots suitable for affordable housing development. This list is primarily composed of parcels with vacant lots of vacant structures.
- Bonus density. The City permits bonus density for affordable housing-designated projects.

The City of Bonita Springs has incentive programs in place. Programs include:

- Bonus density. The City offers bonus densities in seven zoning categories for affordable housing projects.

The City of Cape Coral has incentive programs in place. Programs include:

- Expedited permitting. According to the City's LHAP for years 2016 to 2019, the City developed a system for expediting permitting for affordable housing permits, plan reviews, and other actions. Expediting is accomplished through assignment of an 'expediter' who is responsible for helping move a proposed project through the approval and permitting process. These projects are assigned a high priority status.
- Bonus density. The City of Cape Coral permits bonus density in two zoning districts: the Marketplace Residential and South Cape zoning districts. To be eligible for bonus density, a proposed project must meet four of nine categories. Affordable housing is one of the nine categories.
- Reduction in street width requirements for affordable single-family subdivisions. The City permits reduced street width thresholds for affordable single-family subdivisions.
- Public land inventory. The City mandates that its Affordable Housing Advisory Committee (AHAC) will review all city owned surplus property on a triennial basis and suggest to City Council which properties are suitable for affordable housing. Research during the process of this report revealed that this method does not identify many suitable properties.

Comprehensive Plan

The Lee County Comprehensive Plan offers a number of policies related to promoting attainable housing and ensuring the County's built environment meets the housing needs of current and projected populations, regardless of income. It is worth noting that while many jurisdictions include language similar to the policies and goals listed below, having language on record does not necessarily mean the policies are executed or fulfilled in practice. With that said, it is important to identify the commitments to attainable housing already made by the County in its comprehensive plan.

Included in the Plan is Goal 135 – Meeting Housing Needs, and Goal, particularly Objective 135.4 – Affordable Housing. Objective 135.4 lists a number of ways in which the County will promote affordable housing in the community, including:

- Pursuing federal funding sources for affordable housing.
- Stimulate production of affordable housing through creation of Community Land Trusts (CLT).
- Using SHIP funds from the state for affordable housing.
- Linkage Fee programs.
- Inclusionary Housing Mitigation Programs.
- and alternative use, density, and dimensional standards for affordable housing projects.

Policy 5.1.8 of the Plan also states that the County will provide for an adequate supply of locations for affordable housing through the rezoning process, the provision of public facilities, and the elimination of unnecessary administrative and legal barriers.

Goal 28 offers specific provisions for North Ft Myers. Included in the provisions of Goal 28 are Policies 28.1.7, Policy 28.1.8, Policy 28.1.10, and Policy 28.1.11. These policies are highlighted here because they focus directly on housing and affordability in the North Ft Myers area. A brief description of each of these is included below.

- Policy 28.1.7. Fair Share Projections. The Department of Community Development will prepare an estimate of North Ft Myers' fair share of need by housing type for low-income, workforce, and affordable housing.
- Policy 28.1.8. Site Assessment and Pilot Projects. This policy aims to provide data on eligible sites available for affordable housing and prepare preliminary studies for design and financial analysis for projects in the North Ft Myers area.
- Policy 28.1.10. Addition of apartment types of 500 square feet or less. Single person apartments are supported as a component of the Mixed-Use Overlay. These apartments can be 500 square feet or less.
- Policy 28.1.11. Accessory apartments considered affordable apartments. When considering density limits, accessory apartments can be considered as affordable units, allowing those units to be considered as bonus density.

The City of Bonita Springs' Comprehensive Plan also includes components supporting affordable housing development. An abbreviated list is included below:

- Goal 1, Policy 1.1.2 – Density, Affordable Housing Density Bonus, and Wetlands Transfer of Density. This policy permits additional density in suburban density residential, moderate density residential, moderate density Mix/PUD, medium density residential (multifamily), high density residential (multifamily), High Density Mixed Use, and Old 41 Town Center Mixed-Use Redevelopment zones for designated affordable housing projects.
- Goal 1, Policy 1.1.8 – Medium Density Residential. This policy permits one accessory dwelling unit on single family lots occupied by a principal residence.
- Goal 1, Policy 1.1.11 – Old 41 Town Center Overlay. This policy permits accessory buildings, so long as density does not exceed 5.8 units per acre.

- Goal 1, Objective 1.1 – Housing availability. This goal includes a provision that sites for very low, low, and moderate-income households be provided sufficient to meet the needs of the projected population.
- Goal 1, Policy 1.2.4 – entitlement program eligibility. The City will pursue Federal and state entitlement programs as the City becomes eligible for self-administration of those programs.
- Goal 1, Policy 1.3.4 – contributions to an Affordable Housing Trust Fund. The City shall encourage production of affordable housing for very low, low, and moderate-income households through contributions to the trust fund.
- Objective 1.8, Policy 1.8.1 – GAP affordable housing. The City will encourage construction of workforce and/or GAP affordable housing in the City. GAP housing is defined as housing affordable to persons earning more than 80% of AMI to 150% AMI (Policy 1.8.2)

The City of Cape Coral’s Comprehensive Plan includes components supporting affordable housing development. An abbreviated list is included below:

- Policy 2.2 – economic development. The City pledges to address its affordable housing need, in part, through job training, job creation and economic solutions.
- Policy 2.3 – interlocal agreement. In the event that the City is unable to provide a sufficient number of affordable housing units, an interlocal agreement will be established with a neighboring jurisdiction with the capacity to meet the affordable housing need.
- Policy 10.1 – the City will update its inventory of city-owned property appropriate for affordable housing.
- Policy 10.2 – provide technical assistance to both public and private entities working to identify and develop affordable housing.

Impact Fees

Table 14 offers a glimpse into the estimated impact fees for single family home development, per unit. These fees are considerable, particularly for housing built to be affordable to lower income households. If projects are completed, added costs on a per unit basis are ultimately born by the buyer, and lower income households cannot afford the costs represented in the impact fee schedule.

It should be noted that Lee County offers a 50% reduction in school impact fees for both single family and multi-family units built for very low, low, and moderate-income households. Finally, in addition to the school impact fee reduction, Lee County waives all impact fees for transportation, parks, fire, and EMS for residential construction in the Dunbar Enterprise Zone, Charleston Park, and Harlem Heights as an incentive for development in these communities. The purpose is to incentivize development in the target areas and boost local economic growth.

Impact Fee Schedule, Base Fees: Single Family Residence						
Entity	Parks	Roads	EMS	Fire	Schools	Total
Estero	\$1,506.89	\$6,651.74	\$55.00	\$367.71	\$2,104.29	\$10,685.63
Bonita Springs	\$872.00	\$8,719.00	\$55.00			\$9,646.00

Fort Myers	\$1,119.97	\$2,993.28	\$55.00	\$330.63	\$2,104.29	\$6,603.17
Cape Coral	\$1,115.00	\$3,347.00	\$55.00	\$574.96	\$2,089.99	\$7,181.95
Lee County	\$1,535.00	\$9,996.00	\$55.00	\$766.00	\$5,484.00	\$17,836.00
Source:	FHC review of posted impact fee schedules on jurisdiction web pages and land development codes, as of 5/22/18.					

Table 14. Impact Fee Schedule by Jurisdiction for single-family residences.

At the time this report was written, Lee County adopted a revised impact fee schedule. Lee County commissioners voted to increase the base rate for impact fees on new development and continue charging builders 45 percent of the rate. This 45 percent rate would escalate by 2.5 percentage points per year. For a single-family home, this increase represents an additional \$1,800 in impact fees per unit by 2023. For Lee County, the figures represented in Table 14 are accurate between March, 2018 through May, 2018. Starting in early June, 2018, the new base rate will be collected at the 45% collection rate, escalating to 47.5% in March, 2019. Additionally, a 3% administrative fee is charged on all impact fee assessments.

Impact Fee Schedule, Base Fees: Multi-Family Residence						
Entity	Parks	Roads	EMS	Fire	Schools	Total
Estero	\$1,121.67	\$4,652.51	\$51.50	\$276.04	\$627.58	\$6,729.30
Bonita Springs	\$539.00	\$6,116.00	\$42.00	\$582.00	\$1354.00	\$8,633.00
Fort Myers	833.89	\$2,093.63	\$38.11	\$257.00	\$627.58	\$3,850.21
Cape Coral	\$1,162	\$2,347	\$42.00	\$591.58	\$623.31	\$4,765.89
Lee County	\$1,162.00	\$7,750 (low-rise) \$5,760 (mid-rise) \$4,700 (high-rise)	\$42.00	\$582.00	\$2,123.00	\$11,659 (low) \$9,669 (mid) \$8,609 (high)
Source:	FHC review of posted impact fee schedules on jurisdiction web pages and land development codes, as of 5/22/18.					

Table 15. Impact Fee Schedule, Base Fees by Jurisdiction for multi-family residences.

VI. Attainable Housing Incentive Strategies in Other Florida Communities

This section reviews policies, programs, and strategies local governments in Florida have deployed in pursuit of meeting the housing needs of lower-income families.

Expedited processing of development approvals

Recognizing that delays in permitting and processing of development proposals can impose significant costs on a developer, communities across the state expedite processing of affordable housing development approvals. The actual form in which this expedited process manifests varies by jurisdiction, including a physical or electronic flag for affordable housing applications to be processed at a higher priority.

This strategy is currently in place in Lee County.

- Example implementation: in the City of Orlando, an officially designated individual, called the expeditor, serves as the primary point of contact between local officials in the planning and permitting offices and the developer. The Expediter's primary objective is to ensure the application moves through the system as efficiently as possible.

Impact fee modifications, waivers, or reimbursement

Impact fees are a major expense in developing newly constructed housing. By modifying impact fee requirements to reduce the cost, the cost of developing housing can be reduced and the savings passed on in the form of lower rents or lower sales prices.

This strategy is currently in place in Lee County through the school impact fee reduction program.

- Example implementation: in Alachua County, impact fees are collected on a square foot basis rather than a per unit basis. This encourages development of smaller units that are, presumably, more affordable to lower income households. Collier County has an impact fee deferral program where the County uses building permit fee revenues to pay impact fees for affordable homes at the time of permitting. This payment is a loan that is repaid within ten years, including a lien that is placed on the property.

Managed land bank

This policy is mandated by Florida statute for counties (s.125.379, F.S.) and municipalities (s.155.0451, F.S.). Jurisdictions must prepare an inventory of county/municipality owned real property that is appropriate for affordable housing. This inventory of county/municipality owned property is typically offered to nonprofit or for-profit developers of affordable housing before being auctioned or sold to private entities. Discussions with Lee County staff revealed that available properties are limited, and those properties that are available and suitable for affordable housing are typically shown to local developers with a history of successful affordable housing development.

This strategy is currently in place in Lee County.

- Example implementation: Sarasota County has large platted lands and held title to hundreds of escheated lots. The County sold these lands to raise funds for public projects and affordable housing.

Density Flexibility

Increased bonus densities above by-right densities in the zoning code may be made available to affordable/attainable housing developments. The increased density incentivizes development by increasing the number of units per acre, which may make projects economically viable or provide an even greater return for developers. In addition to bonus/flexible density programs, some jurisdictions have also adopted mandatory inclusionary housing requirements. These inclusionary zoning ordinances require a certain percentage of units in new projects (set at the local level depending on market conditions) be made affordable in any new multifamily or planned unit development.

Bonus density is currently in place in Lee County.

- Example implementation: the City of Orlando manages a voluntary density bonus program. In certain zoning districts bonus density is available for developers that commit to either building affordable housing on-site or providing an in-lieu contribution to an affordable housing trust fund managed by the city. The City of Tallahassee requires 10% of units be affordable and provides 25% density bonuses and housing design flexibility, including from setback and minimum lot size requirements.

Flexible Lot Configurations

Regulations governing minimum parcel sizes, lot configurations, and setback requirements are made flexible for affordable housing development to increase the feasibility of affordable housing development on certain parcels and encourage development of smaller homes that are naturally more affordable.

This strategy is currently in place in Lee County for affordable housing through fast tracked variance requests and planned development re-zoning processes.

- Example implementation: the City of Orlando includes zero-lot line development allowances on a case by case basis for affordable housing projects, reduced setback requirements, and administrative relief for affordable housing projects.

VII. Recommendations for promoting attainable housing in Lee County

This section reviews available options for increasing the supply of attainable housing in Lee County. The options span a range of broad categories, including regulatory, policy, and situational opportunities specific to the Lee County context. These broad categories represent solutions for addressing cost concerns related to development of attainable housing, as well as legal and policy-oriented solutions that pave the way for a substantial increase in the supply of attainable housing.

While these recommendations are offered as a list, numbered and separated by recommendation type, Lee County will only make a significant impact on housing supply for its workforce by adopting or addressing all of the recommendations. Approaching the attainable housing challenge in Lee County cannot be addressed through small measures.

Regulatory recommendations

Regulatory recommendations are those recommendations couched within the traditional regulatory environment of housing and real estate, principally centered on the land use code and comprehensive plans of a jurisdictions. These regulatory recommendations are those that directly address the development environment and orient policies such that attainable housing is incentivized, barriers to development of attainable housing product are reduced, and developers see a clear path to project completion without facing prohibitive regulatory hurdles.

Recommendation 1. Ease Impact Fee Burden for Attainable Housing Projects

As discussed in Section 2 and specifically in Table 14. Impact Fee Schedule by Jurisdiction, impact fees represent a real burden to housing development, especially for attainable housing developers operating on slim margins of profitability and project feasibility. While impact fees are a critical resource for unincorporated Lee County and municipalities within it, they also offer a prime opportunity for incentivizing development of more affordable product by lowering fee schedules for attainable housing projects.

This recommendation is split in two. First, it is recommended that impact fees be assessed on a square footage-basis rather than a per-unit basis. Second, it is recommended that an impact fee deferral program be established to reduce the initial costs associated with development. A description of each of these sub-recommendations is included below.

Recommendation 1.a. Square foot basis

Jurisdictions have the statutory authority to establish impact fees and collect those fees in a manner that best meets the infrastructure needs of new growth at the local level. Across Florida, there is significant variation in the ways local governments collect impact fees. As discussed previously, Lee County and municipalities collect impact fees on a per unit basis by unit type, independent of the square footage of the unit. This places a disproportionate burden on attainable housing product, given the smaller average size of these units.

Recommendation 1.a suggests that impact fees be collected on a square-footage basis. This naturally incentivizes development of smaller housing products, assumed to be more affordable than larger units. Jurisdictions in Florida that have adopted this strategy have done so in a variety of ways, including: 1) establishing square-footage thresholds that determine a flat per-unit impact fee within the threshold, 2) a standard flat fee based on square footage with calculated additional

fees based on square footage, and 3) a calculated impact fee based on the square footage without thresholds. Of these three scenarios, it is recommended that the third option be adopted.

Recommendation 1.b. Impact Fee Deferral Program for Homeowner Units

Jurisdictions are legally obligated to collect impact fees for activities that add a burden to local infrastructure, including but not limited to roads, parks, and schools. Thus, it is not recommended that the County or municipalities strictly waive impact fees for attainable housing projects. Rather, it is recommended that a program be instituted to defer payment of impact fees through issuance of a loan, with a lien, that is forgiven within an established timeframe. If the unit is sold prior to the set timeframe, the loan is reduced on a graduated basis depending on the number of years since issuance. The equity benefit provided in such a program is ultimately born by the income-eligible household that purchases the home.

It is recommended that revenue from the Housing Trust Fund, general revenue, or SHIP funds be used to source the loan. A claw back or recapture mechanism should also be put in place to ensure funds are collected in the event a homeowner sells the property prior to meeting the established timeframe.

Recommendation 2. Reduce Minimum Lot Size Requirements for ADUs

Accessory Dwelling Units (ADUs) are an effective means of naturally expanding the supply of attainable rental housing. ADUs are small detached or attached units to the principal dwelling unit on a parcel. The ADU may include plumbing and utility hookups, climate control, and must include a separate entrance to be designated an additional dwelling unit. Due to the small size of these units, they are naturally affordable in the private rental market, and permit flexibility in living arrangements through lease agreements between private parties and between family members.

ADUs are a key solution for expanding the attainable housing supply in Lee County due to the dominance of single family detached housing in the built environment. ADUs offer a flexible housing option that naturally integrates into existing communities and strengthens property rights by expanding allowable uses in residential communities.

The Land Use Code for Lee County, and other municipalities, permits development of ADUs. Table 16, below, presents permissions and requirements for ADUs in unincorporated Lee County and municipalities within it.

Jurisdiction	Notes	LDC Citation
Lee County	<ul style="list-style-type: none"> - 6000 square foot minimum lot size. - ADU may not exceed 50% of floor area of main unit. - Considered an affordable unit when calculating density. - Off street parking space is required. 	Sec. 34-1177
City of Ft Myers	<ul style="list-style-type: none"> - Garage apartments are prohibited, with one geographic exception. - Studio units of 750 square feet or less is calculated as a .5 dwelling unit. 	118.3.4
City of Bonita Springs	<ul style="list-style-type: none"> - Same requirements noted for Lee County. 	Sec. 4-929
City of Cape Coral	<ul style="list-style-type: none"> - Does not permit ADUs. 	

Jurisdiction	Notes	LDC Citation
Estero	- Permits up to 2 ADUs per residential single-family estate district zoned property. - May not be rented or leased for less than 7 days. - Must be built with one wall placed three feet from the property line adjacent to an alley or lane.	Sec. 33-1626
Fort Myers Beach	- Same requirements noted for Lee County.	Sec. 34-1177
Sanibel Island	- Does not permit ADUs.	

Table 16. ADU requirements in LDCs

Recommendation 2 is split in two. First, it is recommended that the minimum lot size of 6,000 square feet in Lee County be revised to a 5,000 square foot minimum. Second, it is recommended that all municipalities within Lee County permit ADUs to the maximum extent possible.

Recommendation 2.a. Reduce minimum lot size requirement to 5,000 square feet

Recommendation 2.a suggests that the minimum lot size requirement of 6,000 square feet in the County be revised to 5,000 square feet in order to expand the potential pool of ADU-eligible properties in the County. A review of parcel data identified 5,411 residential-zoned parcels in unincorporated Lee County with a lot size between 5,000 and 6,000 square feet. A 5,000 square foot lot can certainly accommodate an attached ADU or a small detached unit, particularly tiny homes in the 100 to 200 square foot range.

Recommendation 2.b. Permit ADUs in City of Cape Coral, Sanibel, expand options in Ft Myers

The City of Cape Coral and Sanibel Island do not currently permit ADUs in their respective land development codes. While these jurisdictions certainly have valid reasons for prohibiting ADUs, it is recommended that ADUs be permitted in these communities in order to expand the supply of attainable housing. In particular, the City of Cape Coral represents a significant opportunity for expanding access to affordable rental housing through adoption of ADUs, given the domination of single family detached housing in its built environment.

The City of Ft Myers prohibits ADUs with the exception of a single geographic region. It is recommended that the City of Ft Myers permit ADUs in all areas and adopt language similar to language in Section 34-1177 of the Lee County land development code following revisions suggested in Recommendation 2.a.

Recommendation 3. Create an Attainable Housing Liaison

The regulatory environment, including zoning, land use regulations, permitting, and other barriers to development, impose meaningful costs to attainable housing developers. Ideally, the regulatory process should take as little time as possible for designated attainable housing projects. While unincorporated Lee County and municipalities within it currently expedite processing of affordable projects, this recommendation extends that courtesy by recommending a staff position be established with the responsibility for shepherding projects through the regulatory process. These individuals, referred to here as an Attainable Housing Liaison, will serve as a champion for attainable housing projects. Ideally, this position would be provided with a certain degree of authority to require action from other departments, be included in inter-departmental meetings, and serve as a lead agent between the jurisdiction, the developer, and neighborhood groups.

It should be noted that the City of Ft Myers, at the time this report was written, was working to fill a total of three positions with responsibilities similar to those described above. The City is hiring one liaison position for commercial, single family, and multifamily projects each.

Recommendation 4. Allow Administrative Review of Alternate Lot Configurations

Flexibility in adapting a parcel of land for development of attainable housing, including zero-lot-line configurations, reduced setbacks, and other means of adjusting development outside of restrictions required in the land development code, should be allowed by-right or through administrative review for attainable housing projects. This would reduce the time it takes to receive approval through the variance and planned development review procedures, often taking months. While it is acknowledged that a by-right permission for flexible lot configurations for attainable housing is aggressive, it is recommended that this course of action be prioritized over administrative review.

Recommendation 5. Top-Weight Affordable Housing Category for Bonus Density Scoring

The City of Cape Coral currently permits bonus density in two zoning districts for affordable housing, so long as at least four of nine qualification categories are met. The nine categories are:

1. Superior site design & quality development
2. Preservation of natural resources
3. Public open space & recreational areas
4. Community facilities
5. Affordable housing
6. Transportation improvements
7. Enhanced waterfront access & use
8. Public improvement fund
9. Land assemblage

It is recommended that the City of Cape Coral top-weight affordable housing features above all other qualification categories, such that it is easier for an affordable housing developer to meet the bonus density requirement without satisfying other qualifications. The qualifications listed represent potential added costs to development – a condition that may preclude developers from pursuing affordable housing, or making certain marginal affordable projects cost prohibitive.

Policy Recommendations

Policy recommendations extend beyond the regulatory environment to actions that requiring policy decisions, intentional coordination with multiple parties, and explicit dedication of resources. The recommendations identified below include: establishing and supporting a community land trust (CLT), establishing an inclusionary zoning requirement for new multifamily development, and dedicating resources to an attainable housing trust fund.

Recommendation 6. Establish & Support a Community Land Trust

A CLT refers to the vehicle of separating land from the building (house) for the purpose of transferring title to the house without selling the land. It also denotes the private non-profit corporation that acquires and holds title to the land and manages the ground leases on that property for the benefit of that community. By separating land value from the structure on it, the property becomes more affordable for lower-income home buyers who share the equity in the

property based on a resale formula established upon the purchase of the property. The CLT non-profit organization holds a 99-year ground lease to ensure long-term affordability.

The CLT organization itself serves a critical role in any effective CLT structure. The CLT serves as a property manager, a financial agent, homeownership counselor, and invested party in a successful arrangement for the homeowner, lenders, and local government.

Recommendation 5 supports an intentional effort by regional government agencies to establish and support a CLT to operate in unincorporated Lee County and municipalities. Ideally, suitable properties owned by Lee County and the municipalities would be initially offered to seed the CLT's operations, and unrestricted grant funding would be offered to the CLT to maintain operations in the first 3 years. Additionally, it is recommended that in the course of establishing the CLT, regional entities think strategically about particular neighborhoods best suited for long-term affordability, given expectations of housing cost inflation, displacement of existing residents, and geographic location relative to job markets and transportation networks. By focusing CLT efforts in these high-value communities, regional entities will realize significant returns on their investment in the CLT.

Recommendation 7. Establish Inclusionary Zoning

Inclusionary zoning is considered a national best practice for encouraging higher densities and boosting the supply of attainable housing in a community. Typically, inclusionary zoning requirements mandate a certain percentage of new multifamily housing units be made affordable to a select household AMI range. Inclusionary zoning is particularly effective in attractive real estate markets, where demand far outstrips supply, and developers can absorb increased costs associated with more intensive development. The distinction between an inclusionary zoning ordinance and a bonus density program is that bonus density programs are voluntary, while inclusionary zoning ordinances are mandatory.

Inclusionary zoning should be adopted in all higher density zones in Lee County, including areas designated as central urban and urban community in the Lee County Comprehensive Plan. Geographic areas with planned redevelopment and intensification of densities, including North Ft Myers and Midtown in the City of Ft Myers, should in particular establish an inclusionary zoning ordinance to ensure long-term affordability. While offering a significant opportunity for a strengthened tax base and concentration of population in mobility-rich and infrastructure-ready regions, these areas are simultaneously vulnerable to cost pressures in the housing market. An inclusionary zoning requirement would go a long way to ensuring a diverse mix of incomes, and a resilient local economy in the years ahead.

Recommendation 8. Dedicate Revenue to the Affordable Housing Trust Fund

Attainable housing, in many instances, requires public sector subsidy to lower the cost of development in order to make the housing affordable to lower income buyers. For this reason, many jurisdictions dedicate revenues to a trust fund for affordable housing.

Lee County has an existing Affordable Housing Trust Fund (Trust Fund). All funds from the State Housing Initiatives Partnership (SHIP) program (state source) and from the federal government are deposited in the trust fund. Additionally, a component of the County's bonus density program (where housing development that includes affordable units) permits developers to exchange

increased density for a cash contribution to the Trust Fund. Research in this report verified that the Trust Fund rarely benefits from developer cash contributions, since the bonus density program is undersubscribed. Developers simply are not seeking to increase maximum densities in the County.

Given the lack of revenue generated by the Bonus Density program, and the critical shortage of attainable housing in the County, Recommendation 8 suggests Lee County dedicate general revenue to the Trust Fund in order to promote development of attainable housing in the community.

Situational Recommendations

Situational opportunities are those that are heavily dependent on timeliness and local events or trends that make the recommendation feasible. Included in the list of situational opportunities are: forming a HOME Consortium between the City of Ft Myers and Lee County, developing a specific and actionable plan for capitalizing on Opportunity Zones, and focusing on development of three parcels of Lee Schools-owned land.

Recommendation 9. Form a HOME Consortium

The U.S. Department of Housing and Urban Development (HUD) HOME Investment Partnerships grant is a critical community development program. It can be used for a variety of activities centered on expanding the supply of attainable housing specifically, including homeowner rehabilitation, development of rental housing, and tenant-based rental assistance.

The City does not meet the program's initial threshold for participation (population in particular). At the same time, unincorporated Lee County does receive HOME funding. It is recommended that the City of Ft Myers and Lee County form a HOME Consortium so that the City can receive HOME funding, and the annual allocation for both entities should rise.

There is a well-established and formal process for establishing a HOME Consortium. The process involves critical steps, including negotiating a consortium agreement, preparing a joint Consolidated Plan, and reporting key program data to HUD. Chief amongst the considerations is designating a lead entity, with responsibility for administration of the program, meeting program requirements, and communicating with HUD. To cover the costs of this administrative burden, a maximum of 10% of the annual allocation may be used on administrative expenses for the Consortium. According to the HUD HOME Consortia Builder (<https://www.hudexchange.info/resource/2450/home-consortia-builder-a-tool-to-estimate-funding/>, published 2012), the City of Ft Myers would contribute approximately \$273,000 in HOME allocation to the Consortia. It should be noted that this figure was current as of 2012 and can be assumed to be higher based on increased population and expanded Congressional allocations to the HOME program since 2012.

Recommendation 10. Develop an Action Plan for Opportunity Zones

A small provision in the December, 2017 tax reform is creation of the Opportunity Zone (OZ) program. These are specially designated census tracts eligible for investment through an investment vehicle called an Opportunity Fund (OF). Private investors that invest unrealized capital gains into a OF receive incremental tax benefits on those capital gains based on the

number of years the capital is in the OF. If investors maintain their position in the OF for 10 years, the entirety of the investment's capital gains are written off.

Figure 16 shows the census tracts nominated by Florida Governor Rick Scott in April, 2018 in Lee County. There is a total of 15 OZs in Lee County, distributed between the City of Ft Myers, the City of Cape Coral, and unincorporated Lee County.

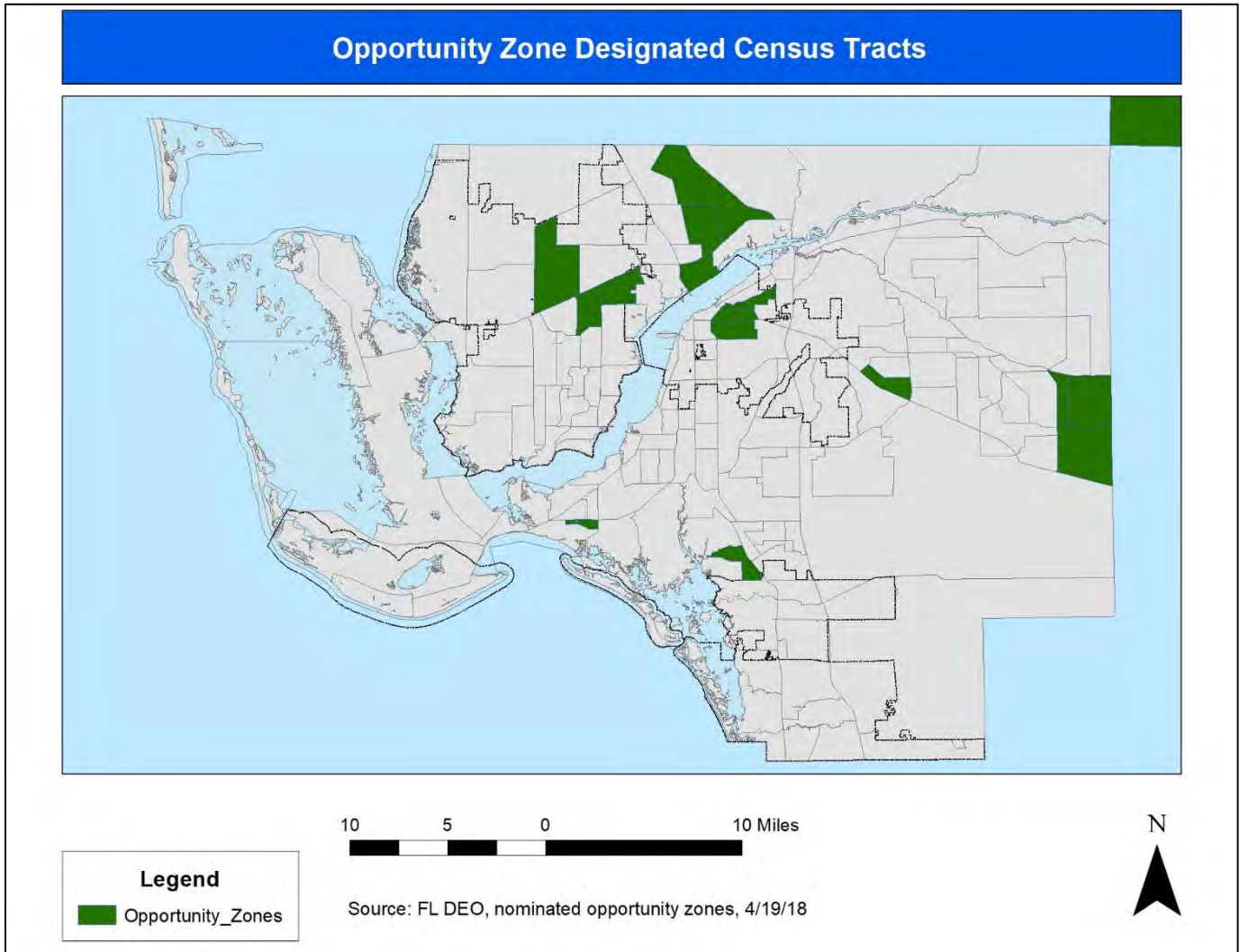


Figure 16. Nominated Opportunity Zones in Lee County, 4/19/18.

Estimates on the potential capital market for OZs are considerable. According to the Economic Innovation Group (EIG), unrealized capital gains in the U.S. amounted to nearly \$6 trillion. This represents a significant opportunity to funnel much-needed capital into housing cost-burdened communities in Lee County.

It should be noted that at the time this report was written, the U.S. Department of Treasury was soliciting public comment and drafting rules and guidelines on the OZ program. Details of this guidance, from reporting requirements to designated beneficiaries of the program, will fundamentally shift how the program operates. Despite this uncertainty, this recommendation

suggests to Lee County, the City of Cape Coral, and Ft Myers that a specific and actionable strategy should be developed for attracting private investment through OZs.

Recommendation 11. Pursue Development of Schools-Owned Land

Research during the development of this report revealed a long-standing concern within the Lee County School Board that a shortage of housing affordable to its teachers, especially first- through third-year teachers, was making it difficult to retain and attract talented employees. In recent years, the School Board identified three parcels of land suitable for development. These parcels are as follows:

1. 610/620 Del Prado Blvd, Cape Coral
2. 13401 Palomino Lane, Fort Myers
3. 5451 Tice Street, Fort Myers

Lee Schools explored partnerships with developers, including initiating pre-development activities. At the time this report was written, however, the Board has shifted its priorities to other areas. This leaves the three properties underutilized and available for attainable housing development. Given that land is a critical component in making any attainable housing project successful, the parcels identified should be made a priority for development. It is recommended that Lee County, Cape Coral, and the City of Ft Myers aggressively pursue and support development in partnership with the School Board.

While it appears the School Board is unable to commit substantial resources or bond authority to housing development, the value in the land is substantial. If the land were offered to a developer at a significantly reduced or nominal cost, development of high-quality, attractive and financially sustainable attainable housing product is certainly feasible.

VIII. Conclusion

This report details the critical shortage of attainable housing in Lee County, and what that reality means for the quality of life for the County's residents, workforce, and employers. It also details existing incentives, at least nominally codified in various land development codes, comprehensive plans, and affordable housing advisory committees across the region. While these incentives and activities represent a step in the right direction, it is evident that efforts already underway are not making a meaningful difference in the landscape of attainable housing.

Much more can, and should, be done.

The recommendations included in this report are intended to help the County, and the municipalities within it, provide housing that is affordable to its highly productive and world-class workforce. The degree to which the recommendations are adopted and executed upon depends, almost entirely, on leadership. Leadership in this context means individual, organizational, and political leaders fighting for and insisting that attainable housing be prioritized over other concerns. The long-term health and resilience of Lee County depends on it.

To get involved in the effort to support attainable housing in Lee County, please contact the Lee County Attainable Housing Coalition at LeeAttainableHousing@gmail.com.