

City of Salisbury



2019 Analysis of Impediments to Fair Housing Choice

**CDBG PY 2019 – 2023
(7/1/2019 – 6/30/2023)**

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Executive Summary

The City of Salisbury, Maryland is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.

The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising Federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. In addition, each year the City, as part of its Annual Action Plan, must sign certifications that the City will affirmatively further fair housing. This means that the City will conduct an Analysis of Impediments to Fair Housing Choice (AI), take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

The City of Salisbury previously prepared an Analysis of Impediments to Fair Housing Choice in 2014. On July 16, 2015, the U.S. Department of Housing and Urban Development (HUD) published its final rule on Affirmatively Furthering Fair Housing. This rule attempted to establish a standardized process for fair housing planning. On May 18, 2018, due to deficiencies in the requirements, information available, and public participation HUD announced the withdrawal of the AFFH Rule, eliminating the AFH Tool, and requiring communities to revert back to the preparation of an Analysis of Impediments to Fair Housing Choice (AI).

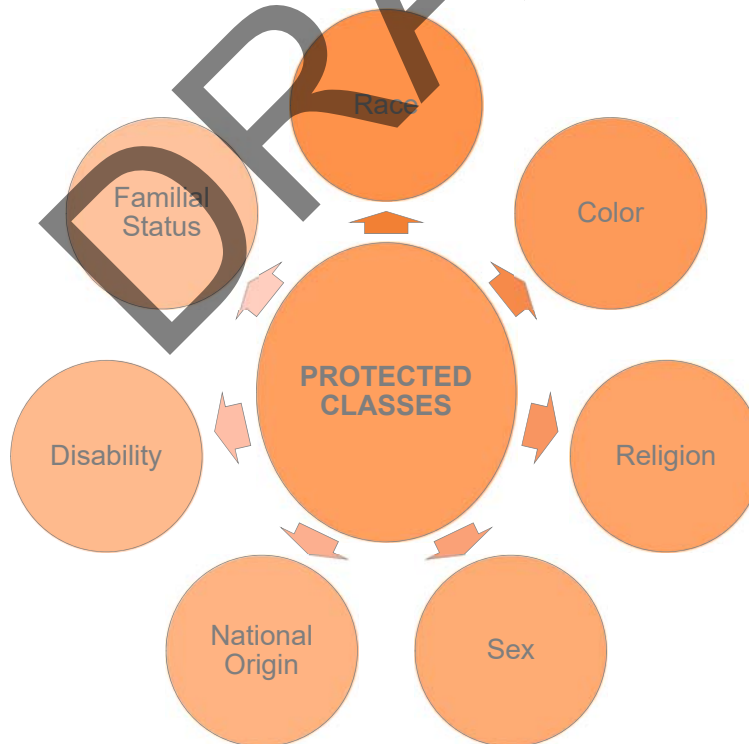
The City of Salisbury is anticipating that it will be submitting its PY 2019 – 2023 Five Year Consolidated Plan in June 2019. The PY 2019-2023 AI is being prepared and submitted in concurrence with the preparation and submission of the City's Consolidated Plan to bring the two planning documents into sequence.

This analysis focuses on the status and interaction of six (6) fundamental conditions within the City of Salisbury:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;

- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse the sale or rental of a property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their **race, color, religion, sex, national origin, disability, or familial status** in the sale, rental, and financing of housing.



As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. Therefore, the City is taking a more efficient and proactive approach towards affirmatively furthering fair housing choice for City residents on both a local level and a regional level. The methodology employed to undertake this Analysis of Impediments included:

- **Research**

- A review of the City's 2014 Analysis of Impediments to Fair Housing Choice, the City's Zoning Ordinance, and the City's 2010 Comprehensive Plan, as well as a review of the PY 2013-2018 Five Year Consolidated Plan, including the City's Annual Action Plans and Consolidated Annual Performance Evaluation Reports covering that time period.
- A review of the Wicomico County Housing Authority's Five Year and Annual PHA Plans.
- A review of the most recent demographic data for the City from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- A review of the residential segregation data from CensusScope.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database.
- A review of the real estate and mortgage practices.
- Home mortgage foreclosure data.

- **Interviews & Meetings**

- Meetings and interviews were conducted with various City and County Departments; the Wicomico County Housing Authority; community, social service, and advocacy agencies, as well as two public meetings.
- Surveys were sent to housing, social service, and community development agencies in the area, as well as a public survey which was available online. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.

- **Analysis of Data**

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.

- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
 - Fair housing awareness in the community was evaluated.
 - Distribution by location of public and assisted housing units were analyzed and mapped.
 - The location of CDBG expenditures throughout the City were analyzed.
 - The City's Five Year Goals and Objectives were reviewed.
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previously identified impediments was analyzed.
- **Citizen Participation**
 - A public survey was made available on the City's website, public meetings were held, and copies of the draft AI were placed on public display to encourage citizen input.
 - The public survey was available at the following link <https://www.surveymonkey.com/s/CityofSalisbury> from January 22, 2019 until February 16, 2019.
 - The City of Salisbury held a needs public hearing on January 29, 2019 and a public hearing on the draft PY 2019-2023 Analysis of Impediments to fair Housing Choice on May 8, 2019.
 - The draft AI was placed on display on the City's website at www.salisbury.md under the Housing & Community Development Department web page. Copies of the plan were available for review at the Wicomico County Library, 122 South Division Street, Salisbury, MD 21801 and the Housing & Community Development Department Office, 207 W. Main Street, Suite 102, Salisbury, MD 21801, from 04/23/2019 until 05/23/2019 for review and comment.

The City of Salisbury's PY 2019-2023 Analysis of Impediments to Fair Housing Choice has identified the following impediments, as well as defined specific goals and strategies to address each impediment.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Continue to identify LEP persons to provide the specific language assistance that is needed.
- **1-E:** Continue to partner with regional jurisdictions and housing providers to encourage fair housing choice throughout the eastern shore.

- **Impediment 2: Continuing Need for Affordable Housing**

Two out of every three renter households in the City are paying over 30% of their monthly incomes on housing costs. One out of every three owner households with a mortgage is paying over 30% of their monthly income on housing costs.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing located outside of areas of lower income and minority concentrations.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs to improve homebuyer awareness.
- **2-D:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.
- **2-E:** Continue to update the information available on the Affordable Housing Resources database located on the City of Salisbury website.

- **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the City of Salisbury as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.
- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied housing units to enable the elderly and/or disabled to remain in their existing homes.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants who are disabled.

- **3-D:** Continue to update the information, including accessibility and visitability. available on the Affordable Housing Resources database located on the City of Salisbury website.

- **Impediment 4: Public Policy**

The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** Revise the City Zoning Ordinance to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the City.
- **4-D:** Appoint City residents to the City's CDBG Committee.

I. Introduction

The City of Salisbury is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD's) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing" the community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office is now advising Federal entitlement communities to update their Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices"

A Fair Housing Analysis consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting a fair housing analysis consider the policies surrounding "visitability," the Section 504 Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is "visitable" has the most basic level of accessibility that enables persons with

disabilities to visit the home of a friend, family member, or neighbor. “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening. Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of Salisbury previously prepared an Analysis of Impediments to Fair Housing Choice in 2014. This Analysis of Impediments to Fair Housing Choice will outline progress that has been made since the previous Analysis of Impediments, explore the continuation of these impediments where necessary, and identify any new impediments to fair housing choice. Furthermore, this Analysis of Impediments will bring the City into sequence with the PY 2019-2023 Five Year Consolidated Plan. The document is designed to act as a planning tool, providing the City of Salisbury with the necessary framework to strategically reduce any identified impediments to fair housing choice over the next five (5) years, and continue to make modifications based on events and activities in the community during this time period.

In order to affirmatively further fair housing in the City of Salisbury, the City must look beyond its boundaries and coordinate fair housing with Wicomico County and the surrounding region. Fair housing choice is the goal of the AI and the opportunity should be made available to low-income residents and the members of the protected classes to live anywhere in Wicomico County and the eastern shore of Maryland.

II. Background Data

The City of Salisbury, Maryland, is located in the southeastern portion of Maryland and is the County Seat of Wicomico County, Maryland. It is the largest City in Maryland's Eastern Shore. Salisbury is the commercial hub of the Delmarva Peninsula, and is referred to as "the Crossroads of Delmarva". The City is located about two hours south of Baltimore, and a half hour west of Ocean City, Maryland. Salisbury sits at the head of the Wicomico River, which flows into the Chesapeake Bay. The Port of Salisbury Marina is the second largest marina of the Chesapeake Bay.

"Salisbury serves as the capital of the Eastern Shore, combining vibrant economic opportunity, quality public education, world-class healthcare, reinvigorated environmental stewardship, globally known corporations, and an energetic and inspiring team of community leaders, to chart its own course, and craft a sound plan for its future." (Source: SBY Brand Statement)

Demographic, housing, economic, and other data was analyzed, including data from the 2000 and 2010 U.S. Census, 2009-2013 and 2013-2017 American Community Survey (ACS) Five-Year Estimates, 2009-2013 Comprehensive Housing Affordability Strategy (CHAS), Association of Religious Data, U.S. Department of Housing and Urban Development (HUD), HUD CPD Maps, HUD AFFH Tool, RealtyTrac, and the City of Salisbury. All data sets used in the analysis are documented in the section the data is presented. This data was used to evaluate the City of Salisbury's demographic, housing and socio-economic characteristics as a basis for determining and identifying any existing impediments to fair housing choice.

A. Population, Race, Ethnicity, and Religion:

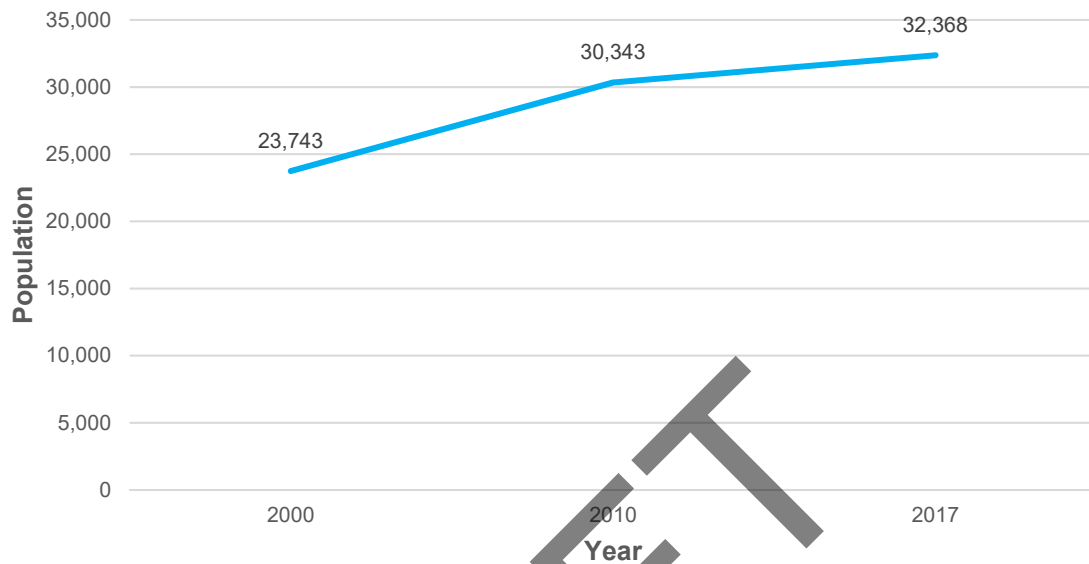
Population

The City of Salisbury's population increased from 23,743 people in 2000 to 30,343 in 2010 and increased to 33,368 people in 2017; an increase of 36.3%. The City's population increased at a greater rate than both the County's and State's rate.

Wicomico County's population increased from 84,644 people in 2000 to 98,733 in 2010 and increased to 102,014 people in 2017; an increase of 20.5%.

The State of Maryland's population increased from 5,296,486 people in 2000 to 5,773,552 in 2010 and increased to 5,996,079 people in 2017; an increase of 13.2%.

Population Change for the City of Salisbury



Source: U.S. Census Data (2000, 2010 and 2013 – 2017 ACS)

Race

The following table highlights the racial composition of the City of Salisbury as shown in the 2010 U.S. Census and in 2017.

Race and Hispanic or Latino Population in the City of Salisbury

Race and Hispanic or Latino	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total	30,343	100.00%	32,368	100.00%
One race	29,361	96.76%	31,557	97.50%
White alone	16,911	55.73%	17,089	52.80%
Black or African American alone	10,441	34.41%	12,720	39.30%
American Indian and Alaska Native alone	81	0.27%	132	0.40%
Asian alone	964	3.18%	1,089	3.40%

Native Hawaiian and Other Pacific Islander alone	21	0.07%	74	0.20%
Some other race alone	943	3.11%	520	1.60%
Hispanic or Latino	2,128	7.01%	2,069	6.40%

Source: 2010 U.S. Census and 2013-2017 ACS

During this time period, the City experienced a decrease in the percentage of people identifying themselves as White Alone, Some Other Race Alone, and Hispanic or Latino. The Black or African American Alone, American Indian and Alaska Native Alone, Asian Alone, and Native Hawaiian and Other Pacific Islander Alone populations increased during this time period. During this same time period, Wicomico County and the State of Maryland experienced a decrease in the White Alone population and an increase in minority populations. The majority of minorities are located in the northwestern section and eastern central sections of the City.

Ethnicity

The following table highlights the ethnicities of Salisbury residents at the time of the 2010 U.S. Census and in 2017.

Ethnicity and Ancestry in the City of Salisbury

ANCESTRY	2010 U.S. Census		2013-2017 ACS	
	#	%	#	%
Total population	30,343	-	32,368	-
Albanian	61	0.21%	0	0.00%
American	1,133	3.86%	1,133	3.86%
Arab	81	0.28%	128	0.28%
Australian	18	0.06%	17	0.05%
Austrian	30	0.10%	130	0.40%
Belgian	31	0.11%	10	0.03%
Brazilian	121	0.41%	11	0.03%
British	184	0.63%	57	0.18%
Cajun	13	0.04%	0	0.00%

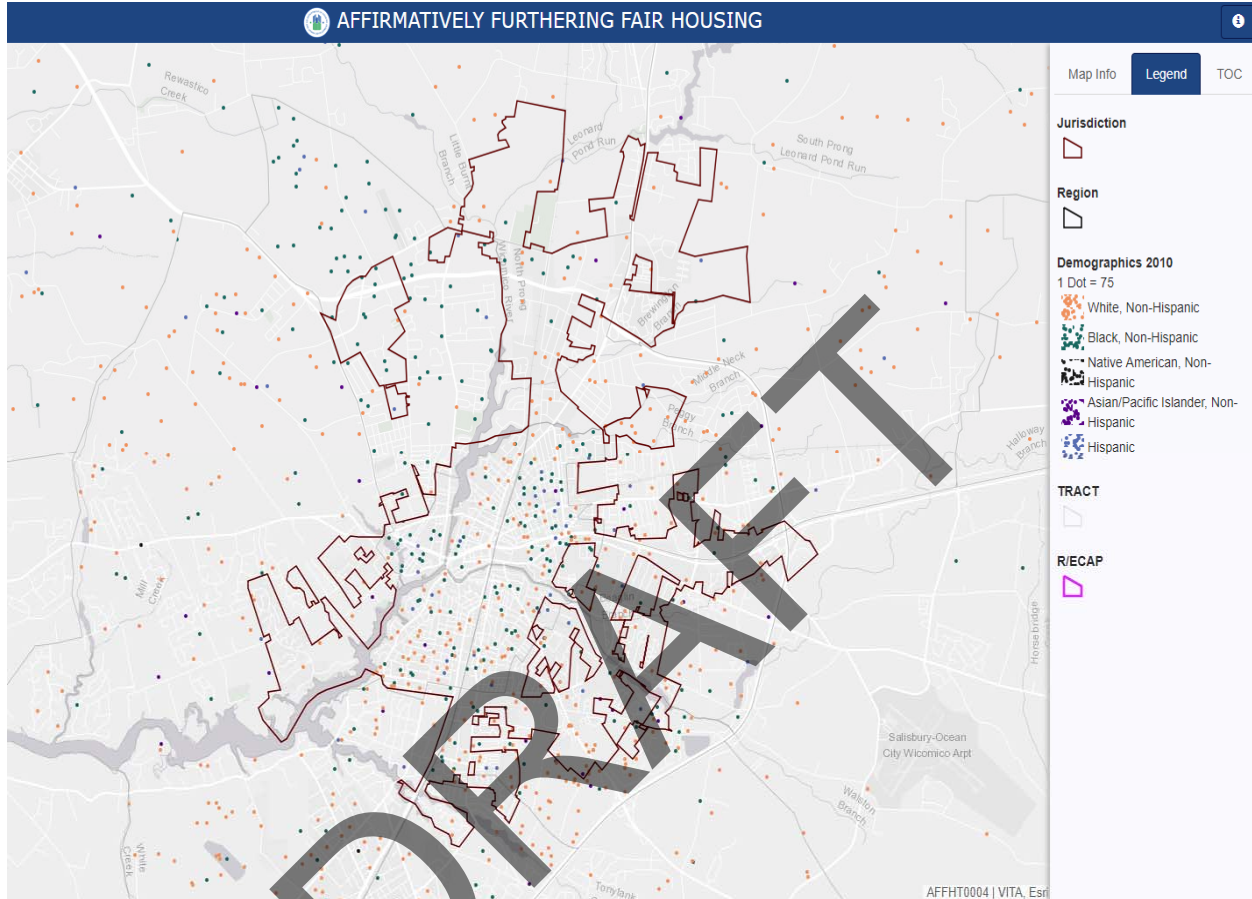
Canadian	50	0.17%	20	0.06%
Celtic	23	0.08%	0	0.00%
Czech	147	0.50%	75	0.23%
Czechoslovakian	23	0.08%	49	0.15%
Danish	48	0.16%	24	0.07%
Dutch	252	0.86%	114	0.35%
Eastern European	10	0.03%	9	0.03%
English	3,261	11.11%	2,635	8.14%
Estonian	0	0.00%	9	0.03%
European	68	0.23%	203	0.63%
French (except Basque)	425	1.45%	368	1.14%
French Canadian	98	0.33%	35	0.11%
German	4,156	14.16%	3,572	11.04%
Greek	168	0.57%	46	0.14%
Guyanese	0	0.00%	47	0.15%
Hungarian	154	0.52%	63	0.19%
Iranian	17	0.06%	0	0.00%
Irish	3,288	11.21%	3,780	11.68%
Italian	1,530	5.21%	1,561	4.82%
Lithuanian	80	0.27%	88	0.27%
Northern European	48	0.16%	20	0.06%
Norwegian	209	0.71%	135	0.42%
Pennsylvania German	18	0.06%	8	0.02%
Polish	647	2.20%	571	1.76%
Portuguese	16	0.05%	14	0.04%
Romanian	31	0.11%	11	0.03%
Russian	200	0.68%	108	0.33%
Scandinavian	17	0.06%	46	0.14%
Scotch-Irish	425	1.45%	275	0.85%

Scottish	665	2.27%	491	1.52%
Slovak	24	0.08%	57	0.18%
Ethiopian	22	0.07%	0	0.00%
Ghanaian	0	0.00%	18	0.06%
Liberian	0	0.00%	8	0.02%
Nigerian	0	0.00%	65	0.20%
Sierra Leonean	0	0.00%	32	0.10%
South African	35	0.12%	0	0.00%
African	131	0.45%	531	1.64%
Other Sub-Saharan African	17	0.06%	38	0.12%
Swedish	154	0.52%	185	0.57%
Swiss	105	0.36%	56	0.17%
Ukrainian	72	0.25%	45	0.14%
Welsh	199	0.68%	135	0.42%
Bermudan	24	0.08%	0	0.00%
Haitian	963	3.28%	1,967	6.08%
Jamaican	189	0.64%	145	0.45%
Trinidadian and Tobagonian	129	0.44%	0	0.00%
West Indian	0	0.00%	17	0.05%
Yugoslavian	0	0.00%	35	0.11%
Other Groups	11,796	40.20%	13,119	40.53%
Unclassified or Not Reported	3,652	12.45%	5,353	16.54%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common ancestries identified in the City of Salisbury were Other Groups, English, German, and Irish. Between 2010 and 2017, the City of Salisbury noted slight fluctuations in ancestry breakdowns. It is of note the increase in the Haitian and Sub-Saharan populations in the City.

The following race/ethnicity dot density map based on the 2010 U.S. Census shows the concentration and location of various racial and ethnic cohorts in the City.

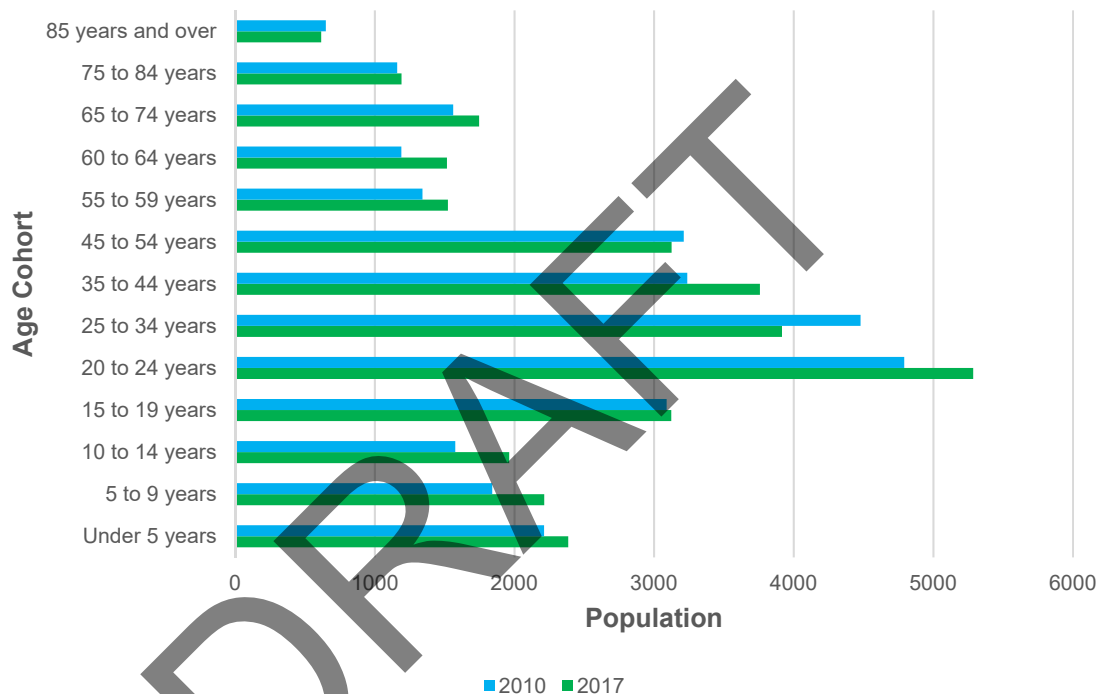


Source: HUD <https://egis.hud.gov/affht/>

Age

The following chart illustrates age distribution in the City at the time of the 2010 U.S. Census and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 29.9% of the population; 40.0% of the City’s population is between 20 and 45 years of age; 19.1% of the population is 45 to 65; and 11.0% of the population is 65 years of age and older.

Age Distribution Change for the City of Salisbury



Source: 2010 U.S. Census and 2013-2017 ACS

The median age in the City of Salisbury as of 2017 was 27.8 years. The median age in the City decreased from 28.1 years at the time of the 2010 U.S. Census. During this same time period, the median age in Wicomico County increased from 35.7 to 35.8 years and the median age for the State of Maryland increased from 37.6 to 38.5 years. The highest concentration of persons age 65 and over is in the eastern and western sections of the City.

Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Salisbury, the City used the data

made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Wicomico County across various denominational groups, as a percentage of the population which reported affiliation with a church.

Religious Affiliation in Wicomico County

	1980		1990		2000		2010	
	#	%	#	%	#	%	#	%
Evangelical Protestant	5,591	21.2%	12,128	35.5%	16,869	41.6%	16,168	43.3%
Black Protestant	2,203	8.4%	1,203	3.5%	0	0.0%	956	2.6%
Mainline Protestant	15,587	59.1%	16,191	47.5%	16,479	40.6%	13,834	37.0%
Catholic	3,480	13.2%	3,731	10.9%	5,675	14.0%	4,656	12.5%
Orthodox	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other	504	1.9%	869	2.6%	1,557	3.8%	1,749	4.7%
Total Adherents:	26,365	40.9%	34,122	45.9%	40,580	47.9%	37,363	37.8%
Unclaimed (% of total population)	38,175	59.2%	40,217	54.1%	44,064	52.1%	61,370	62.2%
Total Population:	64,540	100%	74,339	100%	84,644	100%	98,733	100%

Source: The Association of Religion Data

Between 1980 and 2010, Wicomico County saw a substantial increase in the number of people identifying themselves without a religious affiliation.

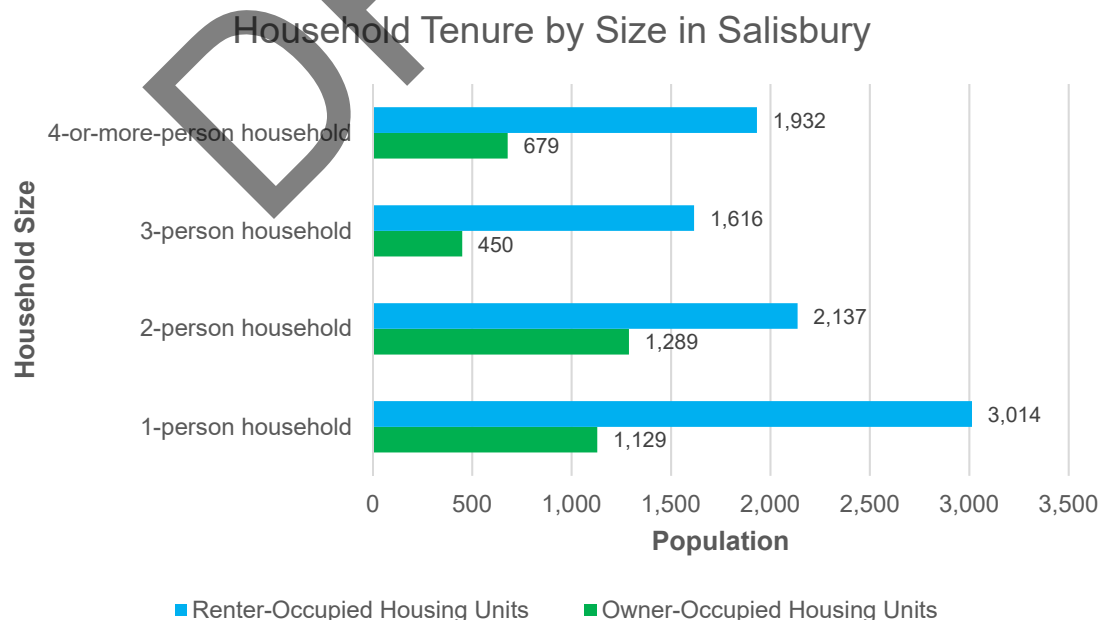
In addition, there was an increase in the population of people identifying themselves as Evangelical Protestants.

B. Households:

Household Tenure

According to the U.S. Census for 2000, there were 9,769 housing units in the City of Salisbury. Of these housing units, 94.4% were occupied and 5.6% were vacant. Of the occupied housing units, 33.3% were owner-occupied and 66.7% were renter-occupied. According to the 2010 U.S. Census, the total number of housing units increased to 13,401; 89.4% of which were occupied and 10.6% of which were vacant. Of the occupied housing units in 2010, 33.2% were owner-occupied and 66.8% were renter-occupied. There was a noticeable increase in the total number of housing units from 2000 to 2010. Additionally, the ratio of owner-occupied to renter-occupied housing units is about 1:2. Based on this housing unit type disparity, special consideration should be made by the City concerning housing related policy and development decisions.

In 2000, the average household size was 2.36 persons and the average family size was 3.00 persons. In 2010, the average household size was 2.42 persons and the average family size was 3.04 persons. The following chart illustrates the breakdown by household size for owner and renter households according to the 2010 U.S. Census.

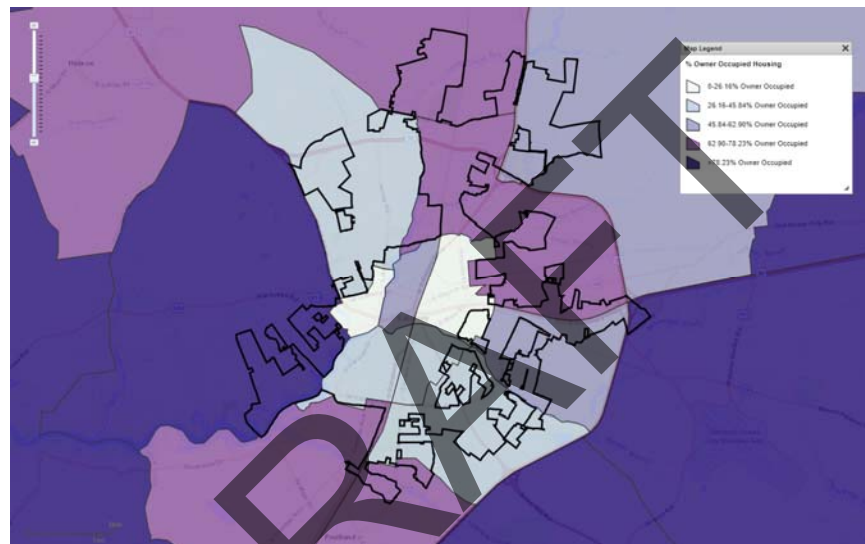


Source: 2013-2017 ACS

Renter-occupied households outnumber owner-occupied households by a factor of almost 2.5. One-person renter-occupied households are the most common household types; followed by two-person renter-occupied households.

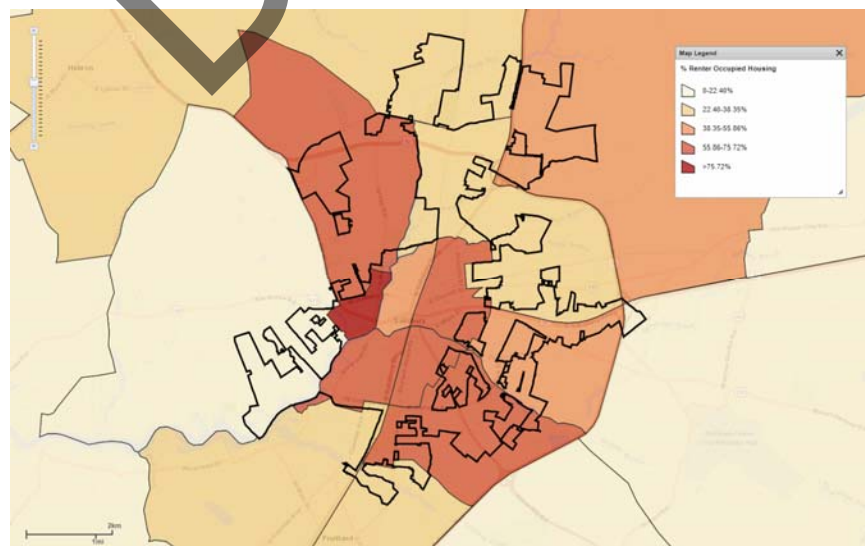
The maps illustrate that owner-occupied units are scattered across the City, with the highest concentrations being located in the outskirts of the City. The highest concentrations of renter-occupied units are more centrally located in the City. Higher concentrations of a particular housing type are accentuated by a darker color.

Percentage Owner-Occupied Housing



Source: HUD CPD Maps

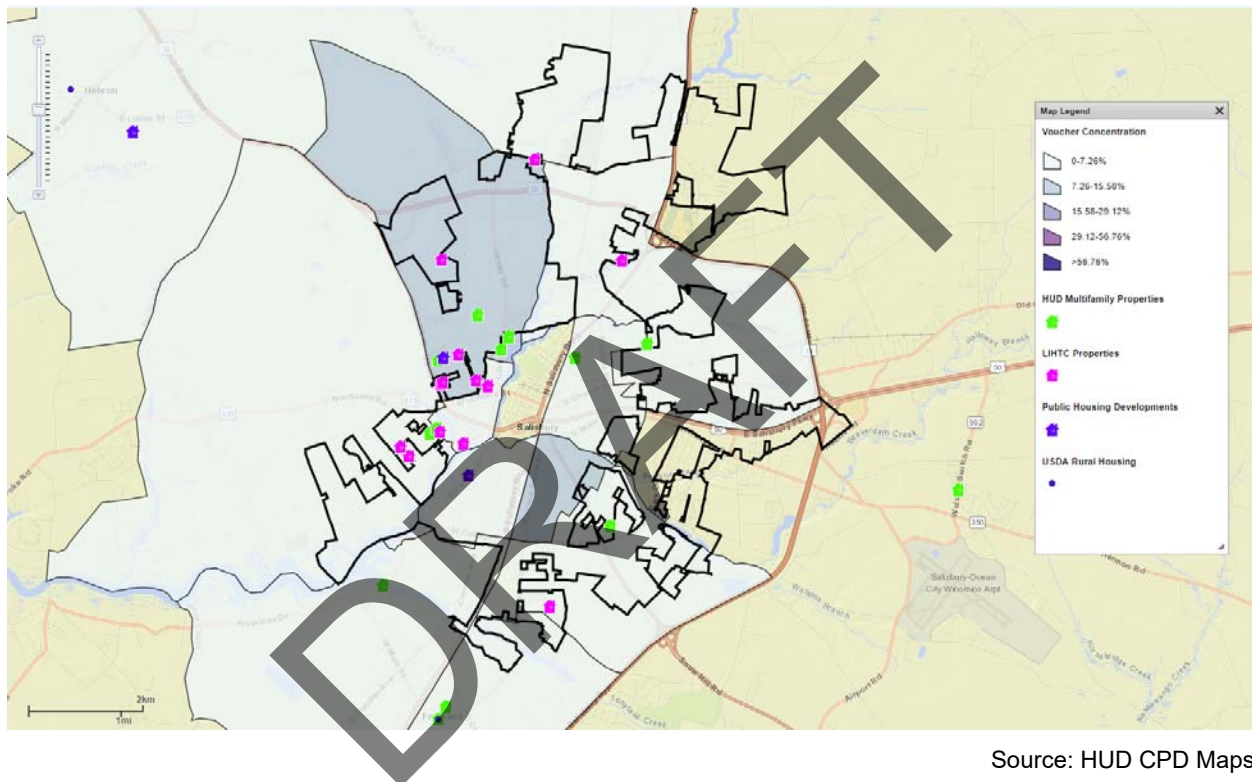
Percentage Renter-Occupied Housing



Source: HUD CPD Maps

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. Illustrated in the map below, there are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

Concentration of HUD Assisted Housing



Source: HUD CPD Maps

The table below compares homeowners and renters by race and ethnicity. White households represent 57.50% of all households, 80.50% of homeowners and 48.10% of renters. Black or African American households represent 36.70% of all households, 13.30% of homeowners and 46.20% of renters. Hispanic or Latino households represent 4.60% of all households and 5.10% of homeowners, 4.40% of renters.

Household Tenure by Race and Ethnicity in the City of Salisbury

Cohort	2010 U.S. Census		2013-2017 ACS	
	Owner	Renter	Owner	Renter
Householder who is White alone	81.98%	54.43%	80.50%	48.10%
Householder who is Black or African American alone	13.46%	41.48%	13.30%	46.20%
Householder who is American Indian and Alaska Native alone	0.23%	0.29%	0.00%	0.50%
Householder who is Asian alone	3.14%	2.10%	4.10%	1.90%
Householder who is Native Hawaiian and Other Pacific Islander alone	0.03%	0.05%	0.60%	0.30%
Householder who is some other race alone	0.13%	0.19%	0.60%	1.40%
Householder who is two or more races	1.03%	1.46%	0.90%	1.60%
Householder who is Hispanic or Latino	2.31%	5.42%	5.10%	4.40%

Source: 2010 U.S. Census and 2013-2017 ACS

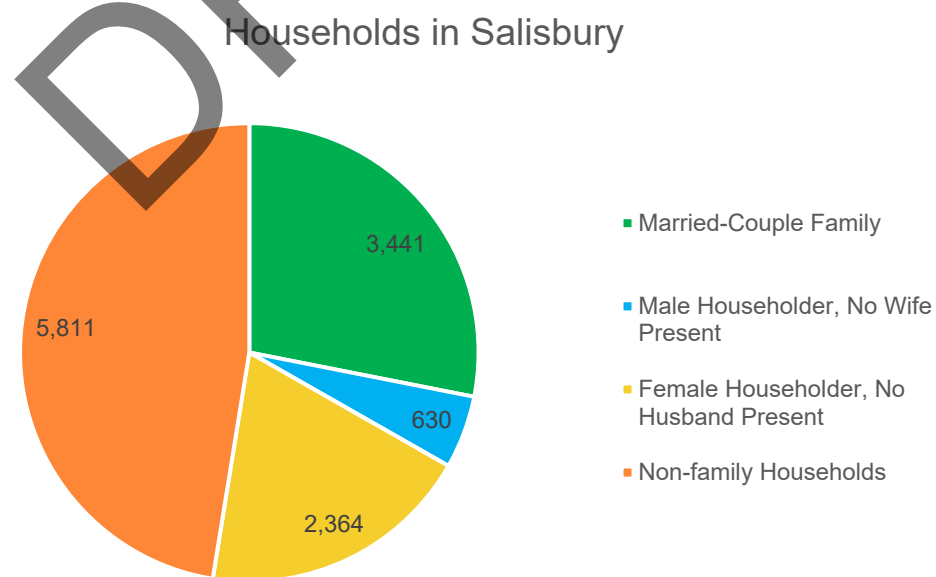
Homeownership rates continue to decline in the City. Homeowners represented 37.8% (3,427 households) of all households in 2000, 33.2% (3,981 households) of all households in 2010, and 28.9% (3,547 households) of all households in 2017. In response, rental rates increased in the City. Renters represented 62.2% (5,634 households) of all households in 2000, 66.8% (8,002 households) of all households in 2010, and 70.7% (8,669 households) of all households in 2017.

Ownership and rental rates have remained relatively constant during the time period of 2010 to 2017 with the exception of Hispanic or Latino homeownership rates increasing by a factor of over two.

Families

In 2000, non-families comprised 47.0% of all households and families comprised 53.0% of all households in the City. In 2010 the percentage of non-families had increased to 49.6% of all households and in 2017 non-families had decreased back to 2000 levels at 47.5% of all households. A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-families comprised 47.5% of all households, married couples comprised 28.1% of all households, female only head of household comprised 19.3% of all households, and male only head of household comprised 5.1% of all households in the City. The chart below illustrates the breakdown of households by type in the City of Salisbury at the time of the 2013-2017 ACS.



Source: 2013-2017 ACS

C. Income and Poverty:

The median household income for the City of Salisbury has decreased over the time period of 2010 to 2017 from \$38,423 in 2010 to \$37,416 in 2017. This decrease is different than the increase in median income for the County and State. The median household income for Wicomico County increased over the time period from \$50,752 in 2010 to \$54,493 in 2017. The median household income for the State of Maryland increased over the time period from \$70,647 in 2010 to \$78,916 in 2017. The table below compares the distribution of household income according to the 2000 U.S. Census and the 2006-2010 American Community Survey. There was an increase in the number and percentage of all income groups above \$35,000 per year.

Household Income in Salisbury, MD

Items	2006-2010 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	11,019	100.00%	12,246	100.00%
Less than \$10,000	1,000	9.08%	1,065	8.70%
\$10,000 to \$14,999	801	7.27%	723	5.90%
\$15,000 to \$24,999	1,609	14.60%	2,192	17.90%
\$25,000 to \$34,999	1,389	12.61%	1,543	12.60%
\$35,000 to \$49,999	2,352	21.34%	1,972	16.10%
\$50,000 to \$74,999	1,855	16.83%	2,217	18.10%
\$75,000 to \$99,999	934	8.48%	1,102	9.00%
\$100,000 to \$149,999	796	7.22%	1,029	8.40%
\$150,000 to \$199,999	155	1.41%	159	1.30%
\$200,000 or more	128	1.16%	233	1.90%
Median Household Income	\$38,423	-	\$37,416	-

2006-2010 and 2013-2017 ACS

The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including the Public Housing, Section 8 project-based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent area definitions for

each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. The table below identifies the FY 2018 HUD Income Limits applicable to the City of Salisbury. The City is part of the Salisbury, MD HUD Metro FMR Area. The Median Income for a family of four (4) in Salisbury was \$71,800 for 2018.

FY 2018 Income Limits Salisbury, MD MSA HUD Metro FMR Area

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	\$15,100	\$17,250	\$20,780	\$25,100	\$29,420	\$33,740	\$38,060	\$42,380
Very Low (50%) Income Limits	\$25,150	\$28,750	\$32,350	\$35,900	\$38,800	\$41,650	\$44,550	\$47,400
Low (80%) Income Limits	\$40,250	\$46,000	\$51,750	\$57,450	\$62,050	\$66,650	\$71,250	\$75,850

Source: U.S. Department of Housing and Urban Development

On February 14, 2019, HUD CPD-10-02 Notice that updated the Department’s Low- and Moderate-Income Summary Data (LMISD) based on the American Community Survey 2011-2015 5-year estimates (2015 ACS). These data will replace the prior LMISD based on the American Community Survey 2006-2010 5-year estimates (2010 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis (“Area Benefit” or LMA). The table below highlights the current low- and moderate-income population in the City of Salisbury. The block groups that have a population of more than 51% low- and moderate-income are **highlighted and bold**. The City of Salisbury has an overall low- and moderate-income population of 60.65%.

Low- and Moderate-Income Population FY 2019 for the City of Salisbury

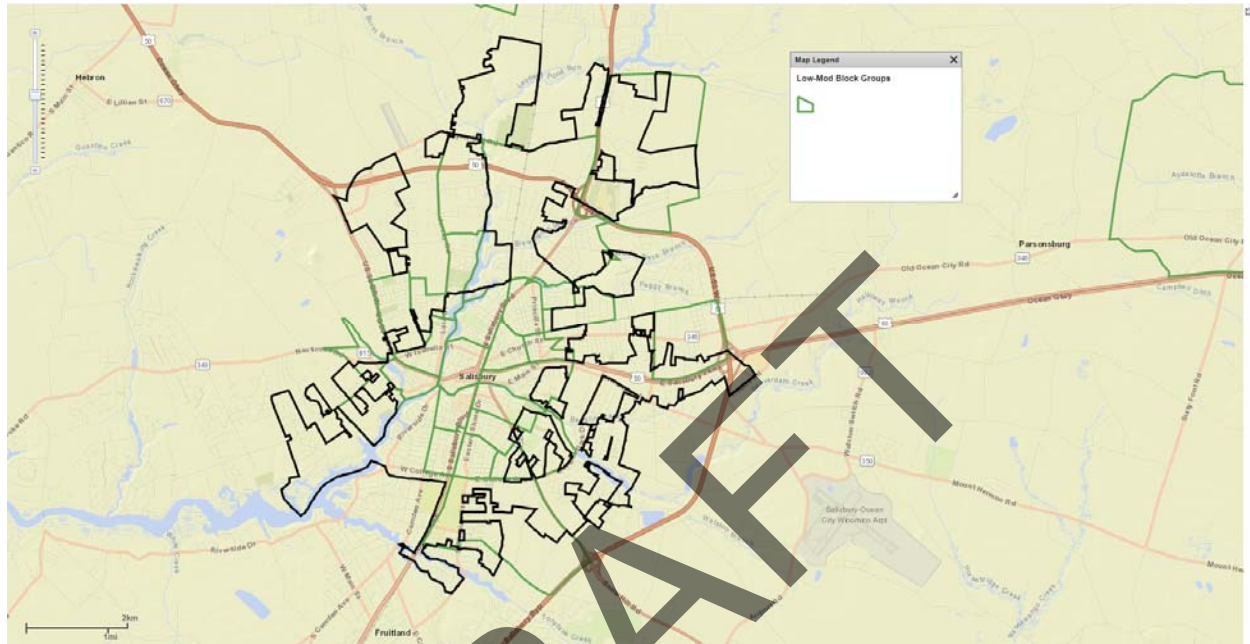
PLACE	CT	BG	LMI	TOT POP	PRCT
Salisbury	000100	1	405	855	47.37%
Salisbury	000100	2	2,335	2,910	80.24%
Salisbury	000100	3	470	720	65.28%
Salisbury	000100	4	320	570	56.14%
Salisbury	000100	5	800	1,020	78.43%
Salisbury	000200	1	570	1,185	48.10%
Salisbury	000200	2	375	650	57.69%

Salisbury	000300	1	440	660	66.67%
Salisbury	000300	2	665	765	86.93%
Salisbury	000400	1	720	1,300	55.38%
Salisbury	000400	2	335	600	55.83%
Salisbury	000400	3	420	1,370	30.66%
Salisbury	000400	4	355	840	42.26%
Salisbury	000500	1	560	1,145	48.91%
Salisbury	000500	2	825	1,175	70.21%
Salisbury	000500	3	550	680	80.88%
Salisbury	010101	1	545	1,055	51.66%
Salisbury	010101	2	785	1,395	56.27%
Salisbury	010101	3	130	1,690	7.69%
Salisbury	010101	4	570	880	64.77%
Salisbury	010101	5	420	905	46.41%
Salisbury	010102	1	1,055	2,180	48.39%
Salisbury	010102	2	520	1,135	45.81%
Salisbury	010200	1	715	1,770	40.40%
Salisbury	010200	2	615	1,130	54.42%
Salisbury	010200	3	920	1,080	85.19%
Salisbury	010200	4	725	890	81.46%
Salisbury	010200	5	865	970	89.18%
Salisbury	010300	1	615	3,205	19.19%
Salisbury	010300	2	310	370	83.78%
Salisbury	010300	3	35	2,215	1.58%
Salisbury	010400	2	335	1,385	24.19%
Salisbury	010400	3	425	1,575	26.98%
Salisbury	010501	1	880	3,150	27.94%
Salisbury	010501	2	235	1,035	22.71%
Salisbury	010502	1	680	1,710	39.77%
Salisbury	010502	2	3,125	3,895	80.23%
Salisbury	010502	3	940	1,265	74.31%
Salisbury	010502	4	995	1,280	77.73%
Salisbury	010603	1	1,260	2,250	56.00%
Salisbury	010603	2	315	1,275	24.71%
Salisbury	010603	4	590	1,400	42.14%
Salisbury	010606	1	460	1,470	31.29%

Salisbury	010702	3	630	2,055	30.66%
Salisbury	010702	6	445	1,415	31.45%

Source: U.S. Department of Housing and Urban Development

Low- and Moderate-Income Population 2019 for the City of Salisbury



Source: U.S. Department of Housing and Urban Development

The low- and moderate-income census tracts are generally located in the central and southern sections of the City. There is some overlap of higher minority concentrations in the low- and moderate income census tracts in the south-central and western sections of the City. It should be noted that the borders of the Census Tracts and Block Groups do not correspond to the boundaries of the City given the non-contiguous nature of the City's boundaries.

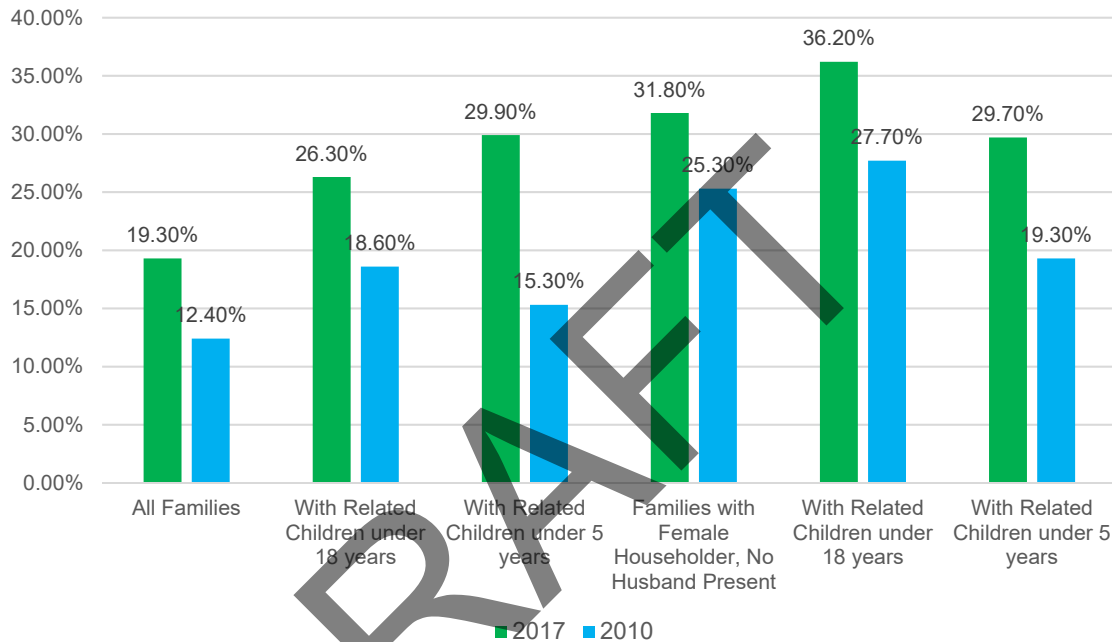
The percentage of families living in poverty experienced a decrease from 16.5% in 2000 to 12.4% in 2010 and then an increase to 19.3% in 2017, according to U.S. Census and ACS data. Female head of household, no husband present, families with related children under the age of 18 whose income was below poverty level was 39.2% in 2000, 27.7% in 2010 and 36.2% in 2017, according to U.S. Census and ACS data.

There was an increase in all people whose income level was below poverty level from 23.8% in 2000 to 26.1% in 2010 and then an additional increase to 27.5% in 2017, according to U.S. Census and ACS data. Individuals under the age of 18 whose income was below the poverty level was 22.0%

in 2000, 28.6% in 2010 and 29.6% in 2017, according to U.S. Census and ACS data.

The City's poverty statistics for families with children are highlighted in the chart below.

Percentage of Families and Female-Headed Households in Poverty in the City of Salisbury



Source: 2006-2010 and 2013-2017 ACS

D. Employment:

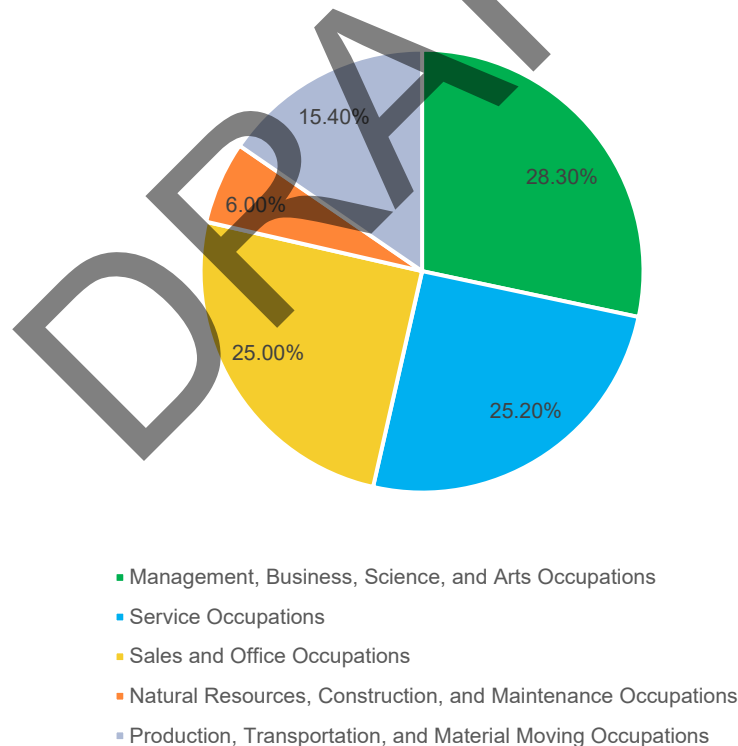
In 2010, 63.8% of the City’s residents 16 years of age and over were part of the labor force. In 2017, 65.9% of the City’s residents 16 years of age and over were part of the labor force; according to the 2006-2010 and 2013-2017 ACS. The following charts illustrate the categories of workers and their occupations.

The largest portion of Salisbury workers are in management, business, science, and arts occupations. One quarter of all workers are in “service occupations,” and one quarter are in “sales and office occupations.”

Workers had a mean travel time to work of 20 minutes.

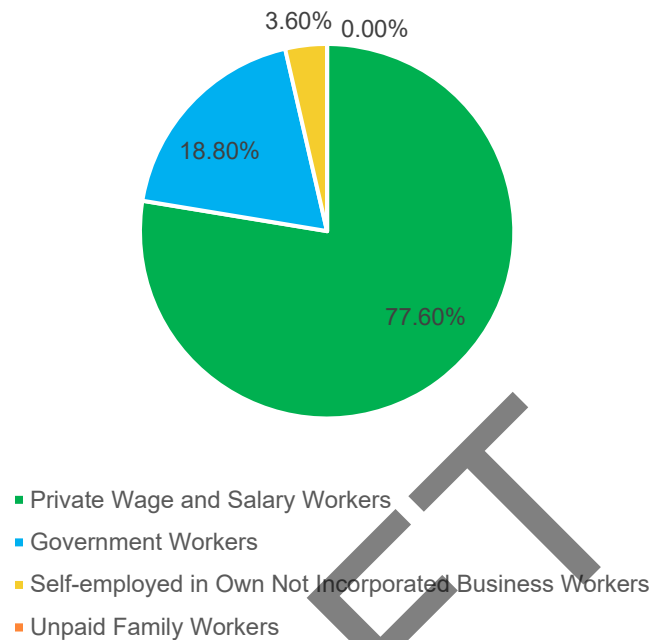
According to the 2013-2017 American Community Survey, an estimated 26.1% of households in the City of Salisbury receive income from Social Security. The mean Social Security Income for 2017 was \$16,170.

Occupations in the City of Salisbury



Source: 2013-2017 ACS

Worker Class in the City of Salisbury

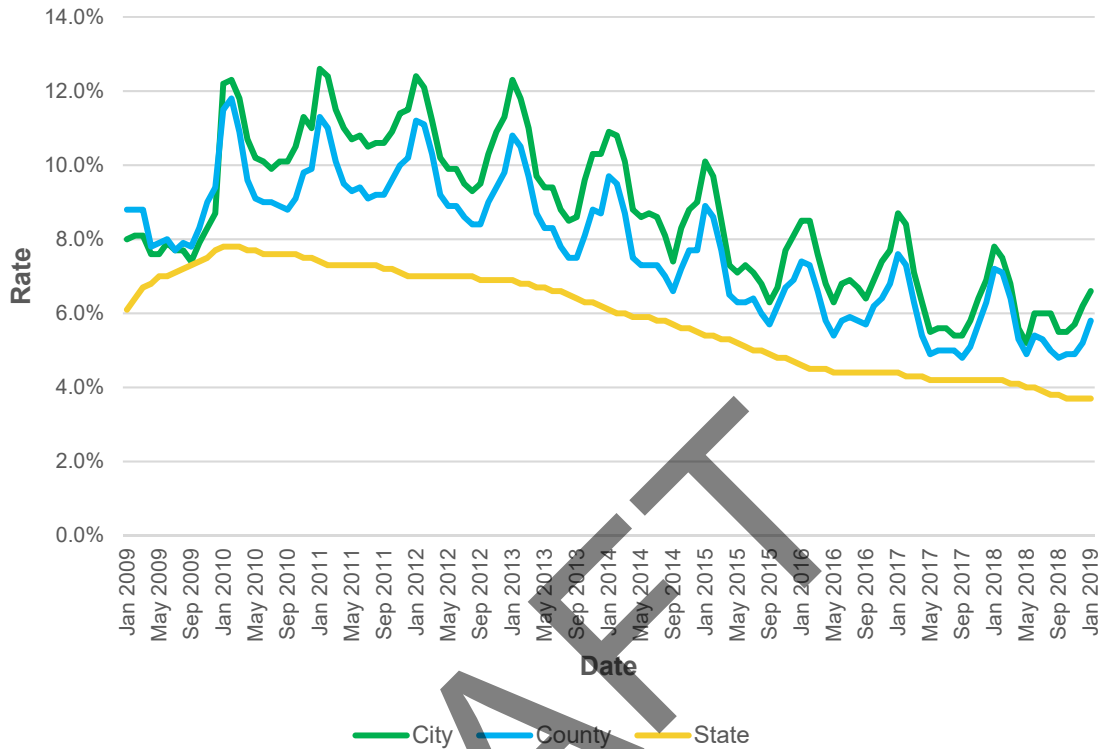


Source: 2013-2017 ACS

The vast majority of workers (77.6%) in the City of Salisbury were classified as Private Wage and Salary workers as of 2017.

The following chart illustrates unemployment rates (seasonally adjusted) for the City of Salisbury, Wicomico County, and the State of Maryland from January 2009 through January 2019 as reported by the Bureau of Labor Statistics (www.bls.gov). In January of 2009, the unemployment rate was 8.0%, peaked at 12.6% in January 2011 and decreased to 6.6% as of January 2019.

City of Salisbury Unemployment Rate



Source: <http://data.bls.gov>

The unemployment rate in the City of Salisbury has been steadily declining since the aftereffects of the Stock Market Crash of 2008. The City has a higher rate of unemployment compared to the County and the State. As of January 2019, the City's unemployment rate was 6.6%, the County's unemployment rate was 5.8%, and the State's unemployment rate was 3.7%.

E. Housing Profile:

Over a third (36.9%) of the City’s housing stock was built prior to 1970, which is now over 50 years old. The majority (22.8%) of the housing units were built between 2000 and 2009. The median year housing structures were built in the City was 1983. The following table chart details the year that housing structures were built in the City of Salisbury as of 2017.

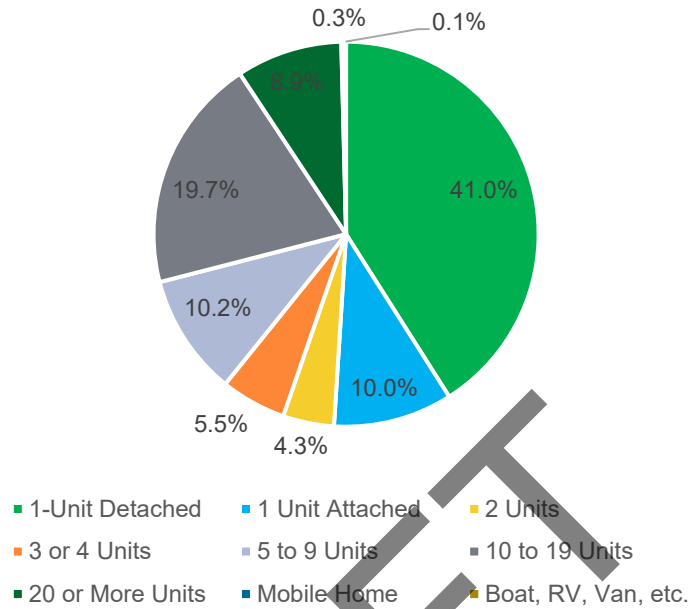
Year Structure Built in the City of Salisbury

Year Structure Built	Number	Percentage
Built 2014 or Later	91	0.6%
Built 2010 to 2013	519	3.6%
Built 2000 to 2009	3,302	22.8%
Built 1990 to 1999	1,929	13.3%
Built 1980 to 1989	2,006	13.9%
Built 1970 to 1979	1,271	8.8%
Built 1960 to 1969	991	6.9%
Built 1950 to 1959	1,468	10.2%
Built 1940 to 1949	1,131	7.8%
Built 1939 or Earlier	1,743	12.1%
Total	14,451	100%

Source: 2013-2017 ACS

The following chart lists the composition of the housing stock in the City of Salisbury as of 2017.

Housing Units in the City of Salisbury



Source: 2013-2017 ACS

The majority of the housing structures in Salisbury are 1-unit detached housing units comprising 41.0% of the units. Multifamily residential structures of 10 or more units represent 28.6% of the housing units.

The table below contains data on the number of permits for residential construction issued by jurisdictions in the Salisbury Core Based Statistical Area (CBSA) which includes Somerset, Sussex, Wicomico, and Worcester Counties. The Area has seen an overall increase in the total number of new units constructed most notably for single family homes. Multi-family units have remained level over the past five years and there have been some fluctuations for multi-family 5+ units. In general, the area has recovered from the 2008-2009 market collapse.

Units Authorized by Building Permits – Salisbury, MD Metro Area

YEAR	Total	Single Family	Multi-Family	5+ Units
2017	3,605	3,032	573	274
2016	3,227	2,668	559	266
2015	3,031	2,512	519	318
2014	2,796	2,237	559	351

2013	734	138	596	594
2012	342	102	240	240
2011	169	167	2	0
2010	194	190	4	0
2009	325	184	141	139
2008	392	252	140	136
2007	677	374	303	303
2006	1,217	836	381	381
2005	1,212	1,027	185	182
2004	1,185	859	326	313
2003	1,298	981	317	261

Source: <http://socds.huduser.org/permits/summary.odt>

The City reported fifty-five (55) single-family building permits during the timeframe of 2014 until 2018.

The cost of housing in the City has fluctuated over the past two decades. The median owner-occupied housing value was \$153,700 in 2017. The median value of owner-occupied homes in the City of Salisbury in 2000 was \$81,700; compared to \$94,500 for Wicomico County. And the median value of owner-occupied homes in the City in 2010 was \$173,000; compared to \$195,100 for Wicomico County.

F. Housing Costs:

Owner Costs

The median Selected Monthly Owner Costs (SMOC) for households with a mortgage in the City was \$1,312 in 2017. The median SMOC for 2000 was \$845 and for 2010 it was \$1,392. Monthly owner costs increased by 55.3% from 2000 to 2017.

The following table illustrates mortgage status and selected monthly owner costs in 2010 and 2017.

Mortgage Status and Selected Monthly Owner Costs in Salisbury

Monthly Owner Cost	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Houses with a mortgage	3,046	69.2%	2,495	70.3%
Less than \$300	0	0.0%	NC	NC
\$300 to \$499	48	1.6%	69*	2.8%
\$500 to \$699	244	8.0%	NC	NC
\$700 to \$999	469	15.4%	505*	20.2%
\$1,000 to \$1,499	984	32.3%	1,034	41.4%
\$1,500 to \$1,999	738	24.2%	545	21.8%
\$2,000 or more	563	18.5%	342	13.8%
Median	\$1,392	(X)	\$1,312	(X)
Houses without a mortgage	1,353	30.8%	1,052	29.7%
Median	\$483	(X)	\$526	(X)

Source: 2006-2010 and 2013-2017 American Community Survey

*For 2017, the U.S. Census changed the cost ranges for mortgage costs to, “Less than \$500” and “\$500 to \$999.”

In real dollars (adjusted for inflation) the monthly housing cost for households with a mortgage and households without a mortgage has slightly declined.

The following table illustrates housing costs for owner-households according to the 2006-2010 and 2013-2017 American Community Survey.

Selected Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Housing units with a mortgage	3,046	69.2%	2,495	70.3%
< than 20 percent	640	21.0%	980	39.3%
20 to 24.9 percent	583	19.1%	410	16.4%
25 to 29.9 percent	291	9.6%	329	13.2%
30 to 34.9 percent	432	14.2%	240	9.6%

35 percent or more	1,100	36.1%	536	21.5%
Not computed	0	0.0%	0	0.0%
Housing units without a mortgage	1,353	30.8%	1,052	29.7%
< than 20 percent	925	68.4%	658	62.5%
20 to 24.9 percent	80	5.9%	82	7.8%
25 to 29.9 percent	47	3.5%	69	6.6%
30 to 34.9 percent	28	2.1%	54	5.1%
35 percent or more	273	20.2%	189	18.0%
Not computed	0	0.0%	0	0.0%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 50.3% of households with a mortgage were cost burdened and 31.1% of households in 2017 were cost burdened. In 2010, 22.3% of households without a mortgage were cost burdened and 23.1% of households in 2017 were cost burdened. Housing cost changes between 2010 and 2017 were the largest for the less than 20% cohort and the 35% or more cohort. Housing cost burdens for households without a mortgage have remained level since 2010, while housing cost burdens for households with a mortgage have decreased.

Foreclosures

According to RealtyTrac, the City of Salisbury had 94 properties in some stage of foreclosure in February 2019; a foreclosure rate of 1 in every 4864 housing units. In February 2019, the number of properties that received a foreclosure filing in Salisbury was 81% lower than the previous month and 82% lower than the same time last year. During the past twelve months, foreclosures have averaged 22 with a high of 37 foreclosures in April 2018 and a low of 4 foreclosures in December 2018.

Renter Costs

The supply of rentals has increased between 2010 and 2017 by almost 2,000 units. There were 6,620 occupied units paying rent in 2010 and 8,584 occupied units paying rent in 2017. The median monthly rent in 2010 was \$930 and increased to \$1,035 per month in 2017. The following table estimates rental rates within the City according to the 2006-2010 and 2013-2017 ACS data.

Gross Monthly Rent in the City of Salisbury

Rental Rates	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than \$200	195	3.0%	NC	NC
\$200 to \$299	134	2.1%	NC	NC
\$300 to \$499	556	8.5%	670*	7.8%
\$500 to \$749	1,098	16.8%	NC	NC
\$750 to \$999	1,915	29.4%	3,266*	38.0%
\$1,000 to \$1,499	2,094	32.1%	3,827	44.6%
\$1,500 or more	529	8.1%	821	9.6%
No cash rent	99	1.5%	115	1.3%
Median	\$930	(X)	\$1,035	(X)

Source: 2006-2010 and 2013-2017 American Community Survey

*For 2017, the U.S. Census changed the cost ranges for rental rates to, "Less than \$500" and "\$500 to \$999."

In real dollars (adjusted for inflation) the monthly rental rates have remained almost level.

The following table illustrates the housing costs for renter-households according to the 2006-2010 and 2013-2017 American Community Survey.

Gross Rent as a Percentage of Household Income in the City of Salisbury

Rental Cost as a % of Income	2006-2010 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Less than 15 percent	789	12.4%	870	10.3%
15 to 19 percent	711	11.1%	711	10.8%
20 to 24 percent	572	9.0%	572	8.2%
25 to 29 percent	765	12.0%	765	10.5%
30 to 34 percent	435	6.8%	435	9.8%
35 percent or more	3,119	48.8%	3,119	50.5%
Not computed	229	3.6%	223	2.6%

Source: 2006-2010 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30% or more of its monthly income on housing costs. In 2010, 55.6% of renter households were cost burdened and 60.3% of renter households in 2017

were cost burdened. While rents in real dollars remained stable, renter housing costs burdens increased as renter household incomes decreased.

The 2018 HUD Fair Market Rents and HOME Rent Limits for the Salisbury, MD HUD MSA are shown in the table below.

FY 2018 Fair Market Rents (FMR) and HOME Rent Limits for the Salisbury, MD MSA

Rent	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
Fair Market Rent	\$662	\$782	\$1,001	\$1,300	\$1,710
High HOME Rent	\$662	\$782	\$1,001	\$1,297	\$1,428
Low HOME Rent	\$662	\$715	\$857	\$990	\$1,105

Source: U.S. Department of Housing and Urban Development

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD’s Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The area median rent is estimated to be \$1,035 according to the 2013-2017 ACS data, which is approximately the cost of a two-bedroom rental and within market expectations. The average rents posted commercially exceed the area median rent and fair market rents but only by a small factor. The rental market in Salisbury is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the City.

G. Household Housing Problems:

Summary of Housing Needs

In the timeframe from 2010 until 2017, the population of Salisbury increased by 6.7% and households grew by 2.2% but household income decreased by 2.6%. According to the Bureau of Labor Statistics Consumer Price Index (CPI), prices in 2017 are 12.41% higher than average prices as compared to prices in 2010. The dollar experienced an average inflation rate of 1.69% per year during this period. This relationship equated to a decrease in

housing unit supply and an increase in housing demand. Unfortunately, with the decrease in median household incomes, housing became more expensive in terms of real dollars for the average household in the City.

General Demographics for the City of Salisbury

Demographics	2010	2017	% Change
Population	30,343	32,368	6.7%
Households	11,983	12,246	2.2%
Median Income	\$38,423	\$37,416	(2.6%)

Source: 2010 U.S. Census and 2013-2017 American Community Survey

The following data was provided by the U.S. Department of Housing and Urban Development (HUD) based on the 2009-2013 ACS data. The tables disaggregate households and housing problems based on the area's median household income (HAMFI).

Household Types

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	2,550	1,960	2,345	1,245	4,000
Small Family Households	945	680	850	415	1,630
Large Family Households	80	155	200	65	270
Household contains at least one person 62-74 years of age	239	295	310	204	879
Household contains at least one person age 75 or older	295	293	295	153	268
Households with one or more children 6 years old or younger	644	548	500	119	570

Source: 2009-2013 American Community Survey

Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	40	135	85	20	280	0	4	0	0	4
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	25	20	4	49	98	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	80	89	180	10	359	4	0	20	10	34
Housing cost burden greater than 50% of income (and none of the above problems)	1,764	680	60	0	2,504	129	160	55	10	354
Housing cost burden greater than 30% of income (and none of the above problems)	125	525	770	80	1,500	25	58	205	78	366
Zero/negative Income (and none of the above problems)	100	0	0	0	100	45	0	0	0	45

Source: 2009-2013 American Community Survey

Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	1,904	925	320	80	3,229	133	170	75	20	398
Having none of four housing problems	305	685	1,455	770	3,215	55	180	485	370	1,090

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	100	0	0	0	100	45	0	0	0	45

Source: 2009-2013 American Community Survey

Cost Burden Greater Than 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	870	570	380	1,820	0	74	99	173
Large Related	80	128	50	258	4	0	38	42
Elderly	295	232	135	662	57	102	75	234
Other	789	455	329	1,573	95	50	59	204
Total need by income	2,034	1,385	894	4,313	156	226	271	653

Source: 2009-2013 American Community Survey

Cost Burden Greater Than 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	840	260	40	1,140	0	55	14	69
Large Related	80	89	0	169	0	0	8	8
Elderly	260	108	10	378	42	64	14	120
Other	689	355	30	1,074	85	50	14	149
Total need by income	1,869	812	80	2,761	127	169	50	346

Source: 2009-2013 American Community Survey

Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	0	4	15	0	19	0	0	0	10	10
Multiple, unrelated family households	25	0	0	25	50	0	0	0	0	0
Other, non-family households	109	109	184	59	461	4	0	20	10	34
Total need by income	0	4	15	0	19	0	0	0	10	10

Source: 2009-2013 American Community Survey

The largest housing problem in the City of Salisbury is housing affordability. According to the 2013-2017 ACS, 60.3% of all renter households are cost burdened by 30% or more and 31.1% of owner households with a mortgage are cost burdened by 30% or more. Cost burdens are especially affecting the 0-30% AMI households.

Additional housing problems that were recorded in consultations and citizen comments included handicap accessible housing, availability of senior housing, availability of group homes or communal living arrangement housing, housing density issues, and code compliance for housing. Lower income households and renter households are more are more likely to be affected by these housing problems.

H. Racial and Ethnic Housing Problems:

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a racial or ethnic group disproportionately experienced a housing need as compared to the City's overall housing needs. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing problems. A housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1 person per room; and 4. housing cost burden is over 30%. The following tables comprised of 2009-2013 CHAS and ACS data identify the disproportionate housing needs in the City of Salisbury.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,037	360	145
White	1,013	154	90
Black / African American	924	204	45
Asian	40	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	60	0	10

Source: 2009-2013 American Community Survey

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,095	865	0
White	540	525	0
Black / African American	364	314	0
Asian	0	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	110	0	0

Source: 2009-2013 American Community Survey

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	395	1,940	0
White	195	930	0
Black / African American	125	805	0
Asian	20	25	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	20	0
Hispanic	50	145	0

Source: 2009-2013 American Community Survey

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	100	1,140	0
White	10	770	0
Black / African American	55	294	0
Asian	0	10	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	24	64	0

Source: 2009-2013 American Community Survey

The racial/ethnic household composition of the City of Salisbury according to the 2009-2013 ACS was 63.8% White, 31.6% Black/African American,

1.6% Asian, 0.2% American Indian Alaska Native, 0.0% Pacific Islander and 4.6% Hispanic. There was one (1) disproportionately impacted group in terms of housing problems; the 0%-30% of Area Median Income Black/African American group that experienced 48.1% of the housing problems of the income group.

A severe housing problem is defined as one of the four following housing problems: 1. housing lacks complete kitchen facilities; 2. housing lacks complete plumbing facilities; 3. housing has more than 1.5 persons per room; and 4. housing cost burden is over 50%. There were three (3) disproportionately impacted groups in terms of severe housing problems; the 0%-30% of Area Median Income Black/African American group that experienced 45.2% of the housing problems of the income group, the 80%-100% of Area Median Income Black/African American group that experienced 55.0% of the housing problems of the income group, and the 80%-100% of Area Median Income Hispanic group that experienced 24.0% of the housing problems of the income group.

I. Racial and Ethnic Housing Cost Burden:

Housing needs disaggregated by racial and ethnic cohorts were analyzed to determine if a group disproportionately experienced a housing cost burden as compared to the City's overall housing cost burdens. A disproportionately greater need was identified when a racial or ethnic group experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as household paying over 30% of household AMI on housing costs. The following table evaluating the 2009-2013 CHAS and ACS data address housing cost burdens in the City of Salisbury.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	6,560	2,239	3,150	145
White	4,095	1,265	1,578	90
Black / African American	1,870	820	1,275	49
Asian	170	35	40	0
American Indian, Alaska Native	10	0	0	0
Pacific Islander	20	0	0	0
Hispanic	285	115	159	10

Source: 2009-2013 American Community Survey

None (0) of the racial/ethnic groups in the City were disproportionately affected by housing cost burdens.

J. Disabled Households:

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in the City of Salisbury. The total population of disabled persons in the City of Salisbury is estimated to be 3,245 persons which represents 10.1% of the total population of the City. The two largest disability types are cognitive and ambulatory difficulties.

Disabled Persons in the City of Salisbury

Disability Status of the Civilian Non-Institutional Population	Total Population	Population with a Disability	Percent with a Disability
Total	32,163	3,245	10.1%
Population under 5 years	2,386	9	0.4%
With a hearing difficulty	(X)	9	0.4%
With a vision difficulty	(X)	0	0.0%
Population 5 to 17 years	5,480	207	3.8%
With a hearing difficulty	(X)	9	0.1%
With a vision difficulty	(X)	16	0.3%
With a cognitive difficulty	(X)	154	2.3%
With an ambulatory difficulty	(X)	27	0.5%
With a self-care difficulty	(X)	0	0.0%
Population 18 to 64 years	20,841	1,847	8.9%
With a hearing difficulty	(X)	218	1.0%
With a vision difficulty	(X)	401	1.9%
With a cognitive difficulty	(X)	832	4.0%
With an ambulatory difficulty	(X)	778	3.7%
With a self-care difficulty	(X)	286	1.4%
With an independent living difficulty	(X)	555	2.7%
Population 65 years and over	3,456	1,181	34.2%
With a hearing difficulty	(X)	506	14.6%
With a vision difficulty	(X)	186	5.4%
With a cognitive difficulty	(X)	384	11.1%
With an ambulatory difficulty	(X)	672	19.4%
With a self-care difficulty	(X)	323	9.3%

With an independent living difficulty	(X)	508	14.7%
SEX			
Male	15,008	1,549	10.3%
Female	17,155	1,696	9.9%
HISPANIC/LATINO ORIGIN			
White alone	16,936	2,228	13.2%
Black or African American alone	12,669	853	6.7%
American Indian and Alaska Native alone	132	0	0.0%
Asian alone	1,089	48	4.4%
Native Hawaiian and Other Pacific Islander alone	74	0	0.0%
Some other race alone	453	28	6.2%
Two or more races	810	88	9.0%
White alone, not Hispanic or Latino	15,419	2,132	13.8%
Hispanic or Latino (of any race)	2,069	187	9.0%

Source: 2013 – 2017 American Community Survey

The CHAS Data has not been updated since 2000 but does provides insight as to the number of households living with a disability and/or mobility issue. The CHAS Data identifies the following prevalence of housing problems for households with mobility and self-care limitations:

- 42.0% of all households report having any housing problem, including 56.4% of renters and 22.1% of homeowners
- 75.6% of all households earning less than or equal to 30% MFI report having any housing problem, including 78.9% of renters and 64.6% of homeowners
- 55.4% of all households earning between 30% and 50% MFI report any housing problems, including 62.5% of renters and 39.8% of homeowners
- 30.9% of all households earning between 50% and 80% MFI report any housing problems, including 46.3% of renters and 9.5% of homeowners

Renter households with mobility and self-care limitations are disproportionately affected by housing problems in the City of Salisbury.

III. Review/Update to Original Plan

The current “Analysis of Impediments to Fair Housing Choice” was certified in May 2014. The City reviews its progress in addressing the goals of the AI twice a year during the City’s preparation of the Annual Action Plan and the Consolidated Annual Performance Evaluation Reports (CAPER). The City of Salisbury’s PY 2014-2018 Analysis of Impediments to Fair Housing Choice identified the following impediments, as well as created goals and strategies to address each impediment.

A. Summary of Impediments:

Impediment 1: Fair Housing Education and Outreach

There is a continuing need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the disabled population.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote Fair Housing awareness through the media and with the assistance of Social Service Agencies such as the Shore Housing Resource Board (SHRB) to provide educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans With Disabilities Act.
- **1-B:** Continue to coordinate efforts between non-English speaking residents and local educational institutions and social service agencies to provide a network of language interpreters.
- **1-C:** Continue to promote public awareness of Fair Housing rights and responsibilities in the local community by issuing a proclamation in support of Fair Housing Month each April to the Shore Housing Resource Board (SHRB).

Progress: The City continues to work with the Shore Housing Resource Board (SHRB) to provide educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans With Disabilities Act. The City provided CDBG funding to SHRB in PY 2009 to complete a number of important activities:

- Conduct a training session with local housing developers, realtors, bankers, insurers, landlords and management agents to inform them of their responsibilities under the Fair Housing Act and Americans With Disabilities Act.
- Develop a new brochure for distribution titled 'Fair Housing Reasonable Accommodation: A Guide to Assist Developers and Providers of Housing for People with Disabilities in the City of Salisbury, Maryland'.
- Develop posters for distribution titled 'Reasonable Accommodation is NOT Unreasonable, It's the Law'.
- Distribute the completed brochures and posters to local housing agencies, developments, landlords and other providers in the housing industry.
- Complete a billboard campaign focused on Reasonable Accommodation during Fair Housing month. These billboards were in five locations around Salisbury.
- Develop an interactive training module on the SHRB website for Fair Housing with an emphasis on Reasonable Accommodation. This final portion of the CDBG-funded project was completed in 2015.

The City continues to promote public awareness of Fair Housing rights and responsibilities in the local community by issuing a proclamation in support of Fair Housing Month in April to the Shore Housing Resource Board (SHRB) whenever requested.

In PY 2016 the City provided CDBG funding to Telamon Corporation to support the salary costs of one additional employee, plus some program delivery costs. This additional funding allowed their Financial Education & Housing Counseling programs to serve a total of one hundred four (104) low- to moderate-income households. Those households were provided with services via workshops and one-on-one counseling. The Financial Education Workshops which were provided utilized the FDIC's Money Smart Curriculum. Workshop topics included Pay Yourself First, Keep It Safe, Banking Basics, Check It Out, Charge It Right, To Your Credit, Money Matters, Your Own Home, Loan to Own, Credit & Mortgages, Rental Rights & Responsibilities, Fair Housing, and First Time Homebuyer. Telamon targets Limited English Proficiency (LEP) populations, including migrant seasonal farms workers and homeless individuals. They have translators on staff who speak both Spanish and Haitian Creole. Of the 104 households served, 75 were minority households, 23 identified as Hispanic or Latino, 72 were female-headed households, and 6 were disabled.

Impediment 2: Continuing Need for Affordable Housing

The City of Salisbury has the greatest supply of affordable housing in the region. However, the monthly cost of rent for apartments and the monthly costs associated with owning a house has steadily increased to the point that over 48.8% of all renter households and 36.1% of all owner households are considered cost overburdened.

Goal: Additional affordable rental and for-sale housing should be developed outside impacted areas throughout the City of Salisbury and the surrounding region, especially for households whose income is less than 80% of the median income, through new construction and in-fill housing, the rehabilitation of vacant buildings, and the development of mixed-income buildings, to reduce the number of households who are cost overburdened.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Support and encourage both private developers and non-profit housing providers to develop plans for the construction of new affordable mixed-income housing that would be located outside of areas with lower income concentrations throughout the Salisbury area.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound housing that is affordable to lower income households.
- **2-C:** Continue to support homebuyer education and training programs to improve homebuyer awareness and increase the opportunities for lower-income households to become homebuyers and move outside areas of low-income concentrations.
- **2-D:** Regularly update the information on the Affordable Housing Resources database located on the City of Salisbury website.

Progress: Over the last several years the City has provided CDBG funding for the following projects that address the need for affordable Housing:

PY 2013 –

- Salisbury Neighborhood Housing Services (SNHS) – Owner-Occupied Housing Rehabilitation – \$83,750

PY 2014 –

- Salisbury Neighborhood Housing Services (SNHS) – Closing Cost / Down Payment Assistance Grants – \$100,000
- Habitat for Humanity of Wicomico County – Housing Construction (735 E. Isabella Street) – \$71,300

PY 2015 –

- Habitat for Humanity of Wicomico County – Housing Construction (425 Coles Circle) – \$72,200
- Village of Hope (Transitional Housing Facility for Homeless Women and Their Children) – Roof Replacement - Residence Building (partial funding) – \$17,480

PY 2016 –

- Salisbury Neighborhood Housing Services (SNHS) – Homebuyer Assistance Grants – \$100,000
- Habitat for Humanity of Wicomico County – Housing Construction (707 E. Church Street) – \$37,650
- Telamon Corporation – Financial Education & Housing Counseling – \$43,500

PY 2017 –

- Salisbury Neighborhood Housing Services (SNHS) – Homebuyer Assistance Grants – \$100,000

PY 2018 –

- Salisbury Neighborhood Housing Services (SNHS) – Homebuyer Assistance Grants – \$100,000

Included in PY 2019 Action Plan –

- Habitat for Humanity of Wicomico County – Housing Construction (504 Tangier Street) – \$88,000

The Affordable Housing Resources list is updated as needed. The last update occurred in June 2018, and a few new listings were added at that time. The list is available on the City website.

Impediment 3: Continuing Need for Accessible Housing Units That Are For-Sale or Rent

There is a lack of accessible housing units in the City of Salisbury.

Goal: Increase the number of accessible housing units through new construction and rehabilitation of existing housing units for both the physically and the developmentally disabled.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Continue the on-going programs to increase the amount of accessible housing through the rehabilitation of the existing housing stock by providing low-interest loans or grants to homeowners and landlords who will make handicap improvements, and will keep their rents affordable.
- **3-B:** Increase the amount of accessible housing through new construction of handicap units that are accessible and visitable through financial or development incentives on available vacant and developable land in the City.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants who are disabled.
- **3-D:** Regularly update the information on the Affordable Housing Resources database located on the City of Salisbury website. This database also includes the number of handicapped-accessible units available in each apartment complex, and whether or not additional units are handicapped-adaptable should the need arise.

Progress: The City has provided funding to Salisbury Neighborhood Housing Services (SNHS) for Owner-Occupied Housing Rehabilitation grants. Those rehabilitation projects may include accessibility modifications to enable homeowners to remain in their homes if those items are requested.

The City has also provided funding to Habitat for Humanity of Wicomico County for new housing construction. For those Habitat partner families with existing mobility issues the houses are constructed to be fully accessible. In addition, all Habitat homes are handicapped adaptable, so that as the owners age and their physical abilities change the house can be modified to enable them to stay in their homes.

The Affordable Housing Resources list is updated as needed. The last update occurred in June 2018, and a few new listings were added at that time. The list includes the number of handicapped-accessible units available in each apartment complex, and whether or not additional units are handicapped-adaptable should the need arise. This list is available on the City website.

Impediment 4: Need to Improve Private Lending and Insurance Practices

The HMDA data suggests that there is a disparity between the approval rates of home mortgage loans originated from whites and those originated from minority applicants.

Goal: Approval rates for all originated home mortgage loans will be fair, unbiased and equal, regardless of race, familial status, and location.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **4-A:** The City should encourage or partner with an outside independent non-profit agency, foundation, or university to conduct an in depth review of the mortgage lending and insurance practices of the local banks and financial institutions.
- **4-B:** Encourage testing to be performed by an outside independent non-profit agency determine if any patterns of discrimination are present in home mortgage lending practices for minorities and for properties located in lower-income areas of the City.
- **4-C:** Federal and State funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve the loan to value ratio, so that private lenders will increase the number of loans made in these areas.

Progress: Over the last 5 years the City has provided a total of \$400,000 to Salisbury Neighborhood Housing Services (SNHS) for Homebuyer Assistance Grants. These grant funds may be utilized for closing costs, down payment and/or principal write down assistance, which makes the home more affordable to the buyer. These projects serve low- to moderate-income clients and assist them in becoming first-time homeowners in neighborhoods throughout the City. Thus far a total of 39 households have been served. Nineteen of the homes purchased have been located in one of our CDBG target neighborhoods, and 20 of the households were minority households.

Impediment 5: There is a Need for a Coordinated Approach to Affirmatively Furthering Fair Housing

The City and County should coordinate efforts to affirmatively further fair housing.

Goal: The City of Salisbury, as lead jurisdiction, should partner with the County to initiate a process to coordinate fair housing practices and policies throughout the City and County.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **5-A:** The City of Salisbury and Wicomico County will continue to work with the Maryland Department of Housing & Community Development (DHCD) and the U.S. Dept. of Housing & Urban Development (HUD) to conduct Fair Housing seminars and workshops in the Salisbury area to educate both local residents and those involved in the rental and/or purchase of housing of their rights and responsibilities in association with the Fair Housing Act.
- **5-B:** The City of Salisbury and Wicomico County will continue to work with local agencies such as the Shore Housing Resource Board (SHRB), Salisbury Neighborhood Housing Services (SNHS), and Habitat for Humanity of Wicomico County to address the housing needs of the area residents.

Progress: The City continues to work with the Shore Housing Resource Board (SHRB) to provide educational awareness/opportunities for all persons to learn more about their rights and requirements under the Fair Housing Act and Americans With Disabilities Act. The City provided CDBG funding to SHRB in PY 2009 to complete a number of important activities:

- Conduct a training session with local housing developers, realtors, bankers, insurers, landlords and management agents to inform them of their responsibilities under the Fair Housing Act and Americans With Disabilities Act.
- Develop a new brochure for distribution titled 'Fair Housing Reasonable Accommodation: A Guide to Assist Developers and Providers of Housing for People with Disabilities in the City of Salisbury, Maryland'.
- Develop posters for distribution titled 'Reasonable Accommodation is NOT Unreasonable, It's the Law'.
- Distribute the completed brochures and posters to local housing agencies, developments, landlords and other providers in the housing industry.
- Complete a billboard campaign focused on Reasonable Accommodation during Fair Housing month. These billboards were in five locations around Salisbury.
- Develop an interactive training module on the SHRB website for Fair Housing with an emphasis on Reasonable Accommodation.

This final portion of the CDBG-funded project was completed in 2015.

The City continues to promote public awareness of Fair Housing rights and responsibilities in the local community by issuing a proclamation in support of Fair Housing Month in April to the Shore Housing Resource Board (SHRB) whenever requested.

Both the City and Wicomico County provide funding assistance to the non-profit agencies which serve to address the housing needs of the area residents, such as the Shore Housing Resource Board (SHRB), Salisbury Neighborhood Housing Services (SNHS), and Habitat for Humanity of Wicomico County. Over the last several years the City has provided CDBG funding to SNHS for Owner-Occupied Housing Rehabilitation and Homebuyer Assistance Grants. CDBG funding has also been provided to Habitat for Humanity for new housing construction, and to SHRB for fair housing training and outreach.

Impediment 6: Public Policy

The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **6-A:** Revise the definition of “family.”
- **6-B:** Revise the definition of “group domiciliary care facility.”
- **6-C:** Revise the definition of “group home.”
- **6-D:** Revise the definition of “housing for the elderly and handicapped.”
- **6-E:** Include the definition of “the Fair Housing Act.”

Progress: In May 2015 the City began reviewing the City’s Zoning Ordinance/Zoning Code to determine what changes should be made in order to clarify our commitment to fair housing. These changes involved adding additional language to the “Definitions” section of the Zoning Code. The proposed changes were reviewed by the Director of Planning, Zoning & Community Development, and the City Attorney. The City Attorney created the two ordinances necessary to amend Chapter 15.24.1620 and Chapter 17.04.120 of the Salisbury City Code to amend the definition and requirements of ‘Functional Family’.

As the ordinances represented a change to the City's Zoning Code, they were required to be approved by the Salisbury - Wicomico County Planning and Zoning Commission. At the Planning and Zoning Commission meeting conducted on November 19, 2015, the ordinances were discussed and a Public Hearing for the text amendment was held. No objections were received during the public hearing, and the text amendment was approved by the Commission.

The Fair Housing Ordinances were then discussed by the City Council at a work session on February 1, 2016. They were approved at first reading February 22, 2016, and second reading/final approval took place on March 14, 2016.

DRAFT

IV. Impediments to Fair Housing 2019

Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice
- Any actions, omissions, or decisions that have this effect. In order to determine if any impediments to fair housing choice exist, interviews and meetings were conducted, surveys were distributed, Census data was reviewed, and an analysis of the fair housing complaints in the City of Salisbury was undertaken.

A. Fair Housing Complaints:

1. Shore Housing Resource Board, Inc.

The Shore Housing Resource Board (SHRB) is a non-profit organization comprised of business, government and other non-profit agencies and individuals working for Fair Housing in the Tri-County area of Wicomico, Worcester & Somerset Counties in Maryland.

Shore Housing Resource Board
P.O. Box 971
Salisbury, Maryland 21803
(800) 652-6312
<http://www.shorehousingrb.com>

SHRB is one of more than 500 Community Housing Resource Boards organized nationwide to encourage voluntary compliance of the housing industry with Fair Housing Laws, and to maximize communication between the Housing Industry and the Minority, Handicapped, Women's and Retired Citizens Groups in Wicomico, Somerset and Worcester Counties. The SHRB Board is comprised of representatives of the following entities: Coastal Association of REALTORS; Somerset County; Wicomico County; Worcester County; City of Salisbury; Legal Aid Bureau; Shore Up, Inc.; City of Pocomoke; Town of Delmar; and local residents

The Shore Housing Resource Board is committed to:

- Promoting compliance with Fair Housing Laws
- Tenant education, responsibility and referral
- Acting as an authority on Housing Issues
- Facilitating open communication with all stakeholders - public and private
- Encouraging development of affordable/workforce housing

- Influencing housing policy by encouraging the counties to support affordable/workforce housing opportunities

The City of Salisbury directs all fair housing complaints to SHRB for consultation. Additionally, the City has funded SHRB education activities with CDBG funds. Some of the activities included:

- Fair Housing Seminar
- Advertising – Billboards, Posters & Brochures
- “Webinar” style training module for the SHRB website

2. Maryland Commission on Civil Rights

The State of Maryland Commission on Civil Rights (MCCR) enforces Maryland’s anti-discrimination laws and promotes equal opportunity in education, employment, housing and commercial property, as well as public accommodations.

**State of Maryland
Commission on Civil Rights**
William Donald Schaefer Tower
6 Saint Paul Street, Suite 900
Baltimore, MD 21202-1631
Main: (410) 767-8600
Toll Free: (800) 637-6247
TTY: (410) 333-1737

The mission statement of the MCCR is as follows: *It is the mission of the Maryland Commission on Civil Rights to ensure opportunity for all through the enforcement of Maryland’s laws against discrimination in employment, housing, public accommodations, and state contracts; to provide educational outreach services related to provisions of this law; and to promote and improve civil rights in Maryland.*

The following is a summary of the housing services offered through MCCR:

*Pursuant to State Government Article, §20-702, Annotated Code of Maryland, it is the policy of the State of Maryland to provide for fair housing throughout the State, to all its citizens, regardless of **race, color, religion or creed, sex, age, ancestry or national origin, marital status, physical or mental disability, sexual orientation, gender identity, and familial status.***

Housing discrimination laws make it illegal to:

- *Refuse to rent a dwelling to any qualified buyer or renter;*
- *Use discriminatory terms and conditions in selling or renting;*
- *Set terms and conditions of home loans in such a way as to discriminate;*
- *Use discriminatory notices or advertisements indicating a preference or discriminatory limitations;*

- *Say that a dwelling is not available for inspection, sale, or rent when, in fact, it is available;*
- *Attempt to steer persons into or away from neighborhoods or apartment complexes due to being members of a protected class;*
- *Treat a person differently from everyone else because of race, disability, familial status (parent or legal custodian with children, pregnant), religion, sex, marital status, national origin or sexual orientation;*
- *Request information about birth control and/or family planning practices;*
- *Refuse to consider both applicants' incomes when seeking to buy or rent;*
- *Commit acts of prejudice, violence, harassment, intimidation, or abuse directed against families or individuals or their residential property.*

If you have a disability, you are protected under the law. It is against the law to:

- *Refuse to permit, or at the expense of the renter, reasonable house modifications that are necessary for the daily life of a person with a mental or physical disability;*
- *Refuse to reasonably accommodate or adjust rules, policies, services or practices that hamper the use of an apartment, condominium, or house by a person with a physical or mental disability;*
- *Have multi-family housing that is not accessible to people with disabilities. Multi-family housing is required to have accessible units and access routes (wide doors and hallways), accessible public and common areas, and management must provide for effective communication as needed by a disabled person.*

Harassment on the basis of a protected class (above, such as sexual harassment), and retaliation for filing a complaint or being involved in the investigation are both prohibited under law and enforced by MCCR.

If you have been denied your housing rights, you may have experienced unlawful discrimination. If you believe that actions have been taken against you based on a discriminatory animus, it is imperative that you contact our agency immediately to initiate an inquiry, so that we can assist you in determining if you have been a victim of housing discrimination. Our trained Intake Staff will guide you through the intake process and, through a series of questions and interviews, help you analyze your situation to determine if the actions taken against you meet the threshold of being considered discriminatory.

The MCCR has its main office in Baltimore, as well as a regional office in Salisbury. There are two eastern shore offices:

MCCR

Salisbury District Court Multi-Purpose Center
201 Baptist Street, Suite 33
Salisbury, Maryland 21801
Phone: (410) 713-3611
Fax: (410) 713-3614

MCCR

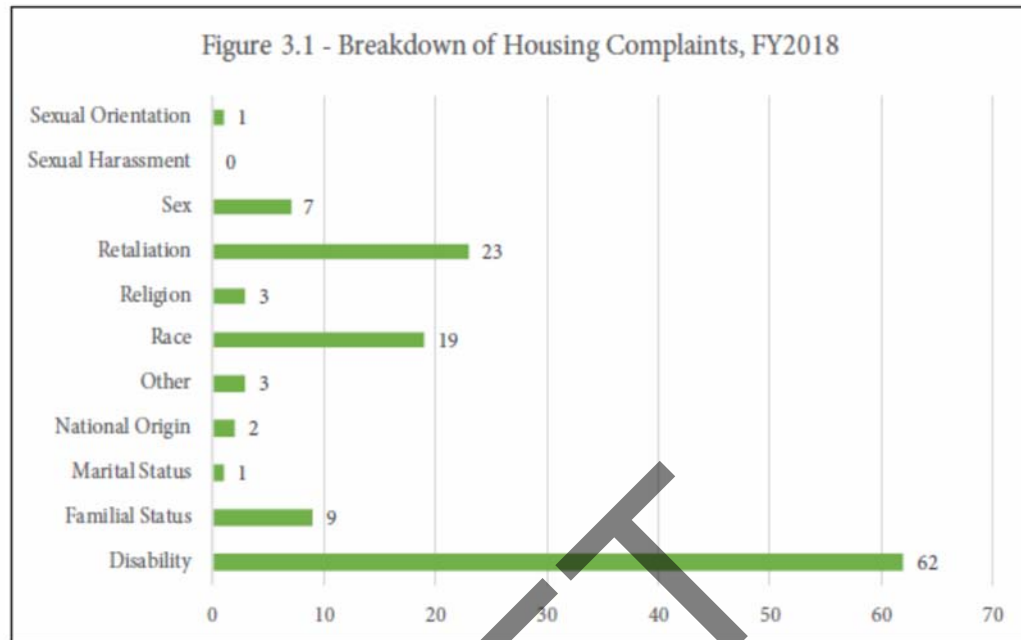
301 Bay Street, Suite 301
Easton, Maryland 21601
Phone: (410) 822-3030 x345
Fax: (410) 820-9966

In addition to its staff members, the MCCR has nine (9) Commissioners appointed by the Governor and confirmed by the State Senate.

The MCCR publishes an annual summary of Housing Complaints filed during the State's fiscal year (July 1st – June 30th). The following is a summary from the FY 2018 annual report:

MCCR has typically received fewer than 100 housing discrimination complaints annually. For a state with approximately 6 million residents, this figure has given the Commission great cause for concern knowing that many instances go unreported. To remedy this, MCCR has partnered with HUD to expend partnership funding to advertise the agency's role as the enforcer of Maryland's Fair Housing Law across the state. MCCR has also strategically targeted communities in every county across Maryland, as well as worked with advertising vendors to produce materials in both English and Spanish. Through combined radio, print, and digital marketing efforts over the past five years thanks to federal partnership grant funding awarded to MCCR, the agency has been able to reach millions of Marylanders to inform them of their right to fair housing.

In FY2018, MCCR received 88 housing discrimination complaints. Within these 88 complaints, 130 different bases were selected. Figure 3.1 shows us that with respect to those bases, the top three selected were disability (48%), retaliation (18%), and race (15%) – similar to FY 2017. The major difference between this year and last is that retaliation outpaced race complaints, similar to employment discrimination complaints this year.



Specific to Wicomico County, the following fair housing complaints have been filed:

Fiscal Year (7/01 to 6/30)	Number of Complaints	Basis
2018	2	Sex, Retaliation
		Disability
2017	2	Disability
		Disability, Retaliation, Other
2016	0	-
2015	1	Race
2014	1	Race

In response to MCCR's observation that instances of fair housing violations go unreported, the City will look for opportunities to partner with MCCR in the future to raise fair housing awareness in the area.

3. Fair Housing Assistance Program (FHAP) Agencies

The Fair Housing Assistance Program offers grants to state and local agencies that have sufficiently demonstrated to HUD that they support or enforce a fair housing law that is substantially equivalent to the Fair Housing Act. Thirty-nine (39) states and the District of Columbia all have at least one state or local agency serving as a FHAP. These funded FHAP agencies carryout fair housing activities such as enforcement and education in order to protect families and individuals who believe that they have been the victims of housing discrimination.

Maryland has one (1) FHAP agency; it is the Maryland Commission on Civil Rights (MCCR).

4. Fair Housing & Equal Opportunity (FHEO-HUD)



The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. According to the HUD FHEO complaint tracking system (TEAPOTS) the following five (5) complaints were filed in the City of Salisbury from January 1, 2015 until March 13, 2019:

HUD REPORTED FAIR HOUSING COMPLAINTS 2015 - 2019

HUD/ FHAP	Street Address	City	Zip Code	County	Filing Date	Closure Date	Closure Reason	Bases	Issues
HUD	809 Camden Avenue	Salisbury		Wicomico	05/02/18	07/31/18	Dismissed for lack of jurisdiction	Disability	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
FHAP	207B Monticello Ave	Salisbury	21801	Wicomico	08/03/16	12/15/16	Conciliation/ settlement successful	Disability	Failure to make reasonable accommodation
FHAP	407 Moss Hill Lane	Salisbury	21804	Wicomico	02/06/17	06/28/18	No cause determination	Disability, Retaliation	Discrimination in terms/conditions/pri vileges relating to rental; Failure to make reasonable accommodation
FHAP	418 W College Ave	Salisbury	21801	Wicomico	02/23/18	06/21/18	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation

FHAP	939 Gateway Street	Salisbury	21801	Wicomico	08/08/18			Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)
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National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 organized by basis of complaint.

HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793		8,186	

Source: HUD FY 2014-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race was next, making up 26% of all complaints, followed by familial status at 11%.

The housing complaints filed in the City of Salisbury were primarily based on disability and race, which are consistently the most common causes for complaints across the nation. Note, the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

5. Maryland Legal Aid

Maryland Legal Aid provides a full range of free civil legal services to financially eligible individuals from twelve (12) office locations serving the state of Maryland. The following office serves Salisbury:

Lower Eastern Shore Office
111 High Street
Salisbury, MD 21801
(410) 546-5511
(800) 444-4099

Office Hours:
Monday – Friday 09:00 AM - 05:00 PM

Walk-In Intake Hours:
Monday – Thursday 09:30 AM - 04:00 PM

Telephone Intake Hours:
Monday – Thursday 09:30 AM - 04:00 PM

Maryland Legal Aid's legal work helps to protect peoples' basic needs and human rights. Legal Aid provides advice on a variety of civil legal issues, such as: Bankruptcy; Child Custody & Support; Debt Collection; Expungements; Foreclosure; Government Benefits; Housing; Landlord/Tenant; Veterans' Benefits; and Wage Claims.

6. Salisbury Human Rights Advisory Committee

The Salisbury Human Rights Advisory Committee (HRAC) seeks to recognize and celebrate the growing diversity of the Salisbury community. The HRAC believes that all community members have the right to be treated with respect, impartiality, and dignity, with equal consideration for race,

color, national origin, immigration status, ancestry, gender, sexual orientation, age, religion or disability.

The Salisbury Human Rights Advisory Committee promotes and encourages respect for the human and civil rights of all Salisbury residents, as well as working to prevent prejudice and discrimination on any basis. It does so by:

- Identifying perceived problems of discrimination or human relations conflicts within the City and then advising the Mayor and City Council of the issue.
- Acting as resource and a safe place where individuals or groups may air their concerns of any existence, potential existence, or perception of discrimination within the City or community at large.
- Providing a forum for the promotion of dialogue, education, healing and celebration of our diversity.
- Sponsoring outreach efforts, educational programs, and celebrations to foster a greater understanding and appreciation for diversity. Such outreach will target groups which may have suffered from or been the object of discrimination or who may perceive themselves to have been the object of the same.

The Salisbury Human Rights Advisory Committee can be reached at the following contact information: 125 N. Division St, Room 306, Salisbury, MD, 21801, (410) 548-3100, www.salisbury.md/mayors-office/human-rights-advisory-committee.

7. Housing and Human Services Agencies

The City of Salisbury interviewed agencies offering housing and human services within the City in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, or through surveys:

- Salisbury Neighborhood Housing Services, Inc.
- Help and Outreach Point of Entry, Inc.
- Coastal Association of Realtors
- Wicomico County NAACP Branch 7028
- Legal Aid
- Shore Up!, Inc.
- Habitat for Humanity of Wicomico County
- MAC, Inc., The Area Agency on Aging
- Maryland Department of the Environment

- Bay Area Center for Independent Living, Inc.
- Lower Shore Workforce Alliance
- Deaf Independent Living Associates
- Salisbury Urban Ministries
- Christian Shelter
- Wicomico County Department of Social Services
- Wicomico County Health Department
- Salisbury-Wicomico Economic Development
- Village of Hope
- Greater Salisbury Committee
- Wicomico County Housing Authority
- Homeless Alliance for the Lower Shore (HALS)

Each of these agencies provided feedback on their and their clients' experiences concerning housing-related issues in the City of Salisbury. Below is a list of key points from each of the meetings.

- Need for affordable housing
- Need for supportive services
- Need for employment opportunities
- Need for employment training

Many agencies also provided suggestions of how to address the identified areas of inequality or discrimination in the City. Commonly suggested strategies to further fair housing in the City are included below:

- Provide more affordable housing
- Provide financial assistance to make housing more affordable
- Provide education and outreach on fair housing

B. Public Sector:

The Analysis of Impediments examines public policies of the jurisdiction and the impact of those policies on fair housing choice. The City government controls land use and development through its comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the City Council. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials and policies determine the community's commitment to housing goals and objectives; therefore, determining if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City’s policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

The City of Salisbury receives Community Development Block Grant (CDBG) funds from HUD as an entitlement city under the CDBG program. The City receives approximately \$350,000 in CDBG funds each year. This funding level has seen notable decreases since the City has been an entitlement community. The City anticipates that CDBG funding levels will remain in flux for the foreseeable future.

The City annually allocates its CDBG funds to a number of eligible projects such as: public facility/infrastructure improvements, public services, the removal of slum and blight, and housing activities. For PY 2019, the City has proposed to allocate its estimated CDBG funds to the projects listed in the table below.

PY 2019 Estimated CDBG Allocation for the City of Salisbury

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)PROGRAM	
Public Facility/Infrastructure Improvements	\$ 191,521
Affordable Housing Construction	\$ 88,000
Program Administration	\$ 69,880

The majority of the activities listed above are undertaken in low/mod income areas of the City, as this is a high priority for the City. The Direct Homeownership Assistance Grants are available to qualified low-mod income clientele city-wide. Additionally, each activity meets the National Objectives of serving a low/mod area, low/mod people, job creation, or reducing slum/blight. Many activities in each funding category specifically work to increase the supply of quality affordable housing units, as well as promote fair housing choice in the City.

The City of Salisbury's PY 2019-2023 Five Year Consolidated Plan identified the following six (6) strategies to address the priority needs in the City:

Housing Strategy Priority Need: There is a need for additional decent, safe, sanitary, and affordable housing for homebuyers, homeowners, and renters.

Goals:

- HS-1 Homeownership – Increase the supply of owner-occupied housing units through housing counseling, down payment assistance, and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units in the City for owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the City by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy Priority Need: There is a need for housing access for homeless persons and persons at-risk of becoming homeless.

Goals:

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist providers operating housing or providing support services for the homeless and persons or families at-risk of becoming homeless.

Other Special Needs Strategy Priority Need: There is a need for housing access, services, and facilities for persons with special needs.

Goals:

- SN-1 Housing – Support an increase in the supply of accessible, decent, safe, sanitary, and affordable housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs through rehabilitation of existing buildings and new construction.
- SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Community Development Strategy Priority Need: There is a need to improve the community facilities, infrastructure, public services, and quality of life in the City of Salisbury.

Goals:

- CD-1 Community Facilities and Infrastructure – Improve the City’s public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
- CD-2 Public Safety and Services – Improve and enhance public safety, public services, and public programs.
- CD-3 Connectivity – Improve connectivity within the City and to surrounding communities through physical, visual, transportation, and accessibility improvements.
- CD-4 Clearance/Demolition – Remove and eliminate slum and blighting conditions throughout the City.

Economic Development Strategy Priority Need: There is a need to encourage employment and economic opportunities in the City of Salisbury.

Goals:

- ED-1 Employment – Support and encourage job creation, job retention, and job training opportunities.
- ED-2 Development – Support business and commercial growth through expansion and new development.
- ED-3 Redevelopment – Plan and promote the development, redevelopment, and revitalization of vacant commercial and industrial sites.
- ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as Tax Incremental Financing (TIF), Tax Abatements (LERTA), Payment in Lieu of Taxes (Pilot), Enterprise Zones/Entitlement Communities, Section 108 Loan Guarantees, Economic Development Initiative (EDI) funds, etc.
- ED-5 Access to Transportation – Support the expansion of public transportation and access to bus and automobile service to assist residents’ transportation needs for employment and job training opportunities.

Administration, Planning, and Management Strategy Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

Goals:

- AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local

funded programs, including planning services for special studies, environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

2. HOME Program

The City of Salisbury is not a HOME entitlement city. The City may apply for HOME funds on a competitive basis through Maryland Department of Housing and Community Development (DHCD). The City has not applied for HOME funds for PY 2019, and has no current plans to apply for HOME funds during the next five (5) years.

3. Emergency Solutions Grant (ESG) Funds

The City of Salisbury applies each year on a competitive basis to the Maryland Department of Housing and Community Development (DHCD) for Emergency Solutions Grant (ESG) Funds to assist local agencies that participate in the Homeless Alliance of the Lower Shore (HALS), the local Continuum of Care agency. HALS (previously known as TCAH) was formed in 2001 by the lead agency, the Somerset County Health Department. The ESG funds received by the City are awarded to homeless service provider agencies that serve the Salisbury area. In FY 2018, the HUD NOFA awarded the CoC a total of \$1,286,378 in CoC funds (not including planning funds), an increase of \$69,684 than originally requested. The increase was the result of an increase in the increased fair market rents used by HUD. The CoC NOFA provided the funding levels shown to the following renewal projects:

- MHA S+C Lower Shore (Somerset & Wicomico) - \$254,723
- MHA S+C Lower Shore (Worcester) - \$68,255
- Project 23 - \$538,056
- Wicomico Chronic 2 - \$19,773
- Project 1 - \$298,539
- Somerset Chronic - \$20,255
- Wicomico Chronic - \$19,834
- Bonus Project - \$63,943
- CoC Planning Application - \$36,411

In 2019, the CoC was awarded \$629,433 in Homelessness Solutions Funds (HSP) which included ESG. The CoC expects HSP total funding levels to at least remain level or increase somewhat in the 2019-2020 HSP NOFA funding.

4. **Housing Opportunity for Persons with AIDS (HOPWA) Funds**

The City of Salisbury does not receive HOPWA funds.

5. **Other Funds**

Other resources available to help Salisbury address its housing and community development needs include funds from the Maryland Department of Housing and Community Development (DHCD), such as low interest mortgage finance (HOME funds), housing rehabilitation money (Maryland Housing Rehabilitation Program - MHRP funds), Special Targeted Area Rehabilitation (STAR) Program funds, lead-based paint reduction funds (Lead Hazard Reduction Program), first-time homebuyer settlement expenses, rental allowance funds (Rental Allowance Program), and neighborhood revitalization program (Community Legacy and Neighborhood Partnership) funds.

Salisbury has successfully obtained funding from the Environmental Protection Agency, the National Fish & Wildlife Foundation, the Maryland Department of Natural Resources, the Department of Transportation, and the State Highway Administration. To help with crime reduction and revitalization activities the City has received funds through the Law Enforcement Block Grant program, the Edward Byrne Memorial Justice Assistance Grant (JAG) program, the Bulletproof Vest Partnership Program (DOJ), as well as Wicomico Exile (gun control), the Gun Violence Reduction Initiative, and the Maryland Criminal Intelligence Network (MCIN) through the Governor's Office of Crime Control & Prevention (GOCCP).

The following list outlines the state and federal grant funds that the City of Salisbury expects to use in PY 2019 to address its community development and crime prevention/reduction needs:

Comcast - Public, Educational & Governmental (PEG) Fees

FY20 - PEG Fees from Comcast

Housing & Community Development Department

FY20 - Homeless Solutions Program - Federal Funds (ESG)

FY20 - Homeless Solutions Program - State Funds

FY20 - Projects for Assistance in Transition from Homelessness (PATH)

FY20 - Community Legacy

PY19 - Community Development Block Grant (CDBG)

FY20 - Maryland Heritage Area Authority (MHAA)

FY20 - Rural Maryland Prosperity Investment Fund

Infrastructure & Development Department

FY19 - Transportation Alternatives (TA) - Rails with Trails

FY20 - ENR O&M Grant - MDE Bay Restoration Fund (BRF)

Salisbury Fire Department

FY17 - Staffing for Adequate Fire & Emergency Response (SAFER)

FY20 - Salisbury Wicomico Firstcare Team (SWIFT)

FY18 - Assistance to Firefighters Grant (AFG)

FY19 - Port Security Grant (3 projects)

Salisbury Police Department

FY17, 18 & 19 - COPS Grant

FY20 - Bulletproof Vest Partnership

FY20 - MD Criminal Intelligence Network (MCIN)

FFY20 - Edward Byrne Memorial JAG

FY20 - Gun Violence Reduction Initiative

FFY20 - MD Highway Safety Office - Impaired Driver (DUI)

FFY20 - MD Highway Safety Office - Aggressive Driver

FFY20 - MD Highway Safety Office - Distracted Driver

FY20 - Wicomico County Circuit Court - Drug Court

FY18 - Wicomico County Adult Drug Treatment Court

FFY20 - U.S. Marshals Program

The City also plans to use its own resources to help resolve its housing and community development problems. In particular, an additional \$36,092 in City funds will be used to directly operate the CDBG Program. Additional City General Revenue funds have been allocated for housing and community development activities in the City:

The Police Dept. grants will require an FY20 match, totaling \$212,196.

The Fire Dept. grants will require an FY20 match, totaling \$293,905.

The Infrastructure & Development Dept. has a TA grant that will require a FY20 match of \$180,631.

These matching amounts total up to an additional \$722,824 that will be utilized to address the housing, community development and public safety needs of the City of Salisbury residents.

6. **Public Housing, HUD Assisted Housing, and Low Income Housing Tax Credits**

The City of Salisbury has a variety of affordable housing options, including public housing managed by the Wicomico County Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Section 8 Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Authority

The Wicomico County Housing Authority (WCHA) is the Public Housing Authority serving the City of Salisbury and Wicomico County. WCHA owns and manages 277 units of public housing of which 179 units are in the City of Salisbury. Additionally, the WCHA administers 223 Housing Choice Vouchers, all of which are tenant based.

The most immediate need of the current residents of Public Housing is for employment training, job opportunities, and access to transportation for commuting to work, shopping, and medical services.

The immediate needs of the Housing Choice Voucher holders is similar. They need housing units that are close to public transportation or their place of employment. There does not appear to be any housing needs, except the supply of available housing units is limited and therefore there is a shortage of housing choice.

Homeless Facilities

The following is a list of CoC member supported facilities:

Christian Shelter – 334 Barclay Street, Salisbury, MD 21804

Christian Shelter provides emergency short term shelter for homeless men, women and children including breakfast and dinner and practical and spiritual guidance for a maximum of 30 days.

Samaritan Ministries – 814 Fourth St, P.O. Box 661, Pocomoke City, MD 21851

Samaritan Ministries provides emergency housing, food, resources, support and clothing for families and individuals. Staff is available to help each individual work toward developing a plan of action to become self-sufficient and move to permanent housing or other housing to meet their needs.

Diakonia, Inc. – 12747 Old Bridge Road, Ocean City, MD 21842

Diakonia provides an emergency housing program for families and individuals to meet the needs and address the root causes of

homelessness. Each individual or family works with a case manager and develops a plan to resolve the issues that brought them to Diakonia and works through their plan in order to move to permanent sustainable housing. In order to be eligible for intake, the individual (must be 18 years or older) or family must have lived in Worcester, Wicomico or Somerset County for at least 30 days.

Cold Weather Shelter for Men – Location changes weekly, only available during cold months January thru March.

HALO Women and Children Shelter and Men's Shelter – 119 South Boulevard, Salisbury, MD 21804

Women and Men's shelter are separate. No family rooms available. Individuals or families may stay up to 90 days at a time in the shelter; however, must be out for 60 days before returning.

Life Crisis Center – Available 24 hours a day, 7 days a week
Life Crisis offers emergency shelter for domestic violence victims and their families.

Lower Shore Shelter – 12518 Somerset Avenue, Princess Anne, MD 21853
Ocean City Cold Weather Shelter
Open only when temperatures are below 25 degrees.

Village of Hope – 1001 Lake Street, Salisbury, MD 21801
Provides transitional housing for women with children.

Joseph House Workshop – 816 Boundary Street, P.O. Box 1755, Salisbury, MD 21802-1755
Provides transitional housing for men.

Low Income Housing Tax Credit (LIHTC) Housing

The following is a list of Low Income Housing Tax Credit housing in the City of Salisbury:

LIHTC PROJECTS IN SALISBURY, MD

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
MDA00000057	RIVERS EDGE	670 FITZWATER ST	SALISBURY	MD	21801	90	-
MDA00000076	WESTBROOK COMMONS	555 W RD	SALISBURY	MD	21801	96	-

MDA19920075	SCHUMAKER PLACE	816 S SCHUMAKER DR	SALISBURY	MD	21804	96	96
MDA20070070	LODGES AT NAYLOR MILL	29339 NAYLOR MILL RD	SALISBURY	MD	21801	65	65
MDA19950075	EASTGATE VILLAGE	1700 EASTGATE DR	SALISBURY	MD	21804	60	60
MDA19970050	GATEWAY VILLAGE PHASE I	500 508EVEN GATEWAY ST	SALISBURY	MD	21801	58	58
MDA19990055	GATEWAY VILLAGE PHASE II	939 GATEWAY ST	SALISBURY	MD	21801	62	62
MDA20030012	COTTAGES AT RIVER HOUSE I	1000 RIVERHOUSE DR	SALISBURY	MD	21801	29	29
MDA20040050	HOMES AT FOXFIELD	128 FOXFIELD CIR	SALISBURY	MD	21801	112	112
MDA20070133	WESTBROOK APT HOMES	500 DELAWARE AVE	SALISBURY	MD	21801	96	95
MDA20060022	COTTAGES AT RIVER HOUSE II	1002 RIVERHOUSE DR	SALISBURY	MD	21801	52	52
MDA20090025	COTTAGES AT RIVER HOUSE III	1022 RIVERHOUSE DR	SALISBURY	MD	21801	32	32
MDA20160013	THE LODGES AT NAYLOR MILL PHASE II	29339 Naylor Mill Road	Salisbury	MD	21802	45	45
MDA20040075	PEMBERTON MANOR APTS	1020 FAIRGROUND DR	SALISBURY	MD	21801	209	209
MDA20040100	SALISBURY COMMONS	105 WINTERBORN LN	SALISBURY	MD	21804	96	96
MDA20050065	GATEWAY VILLAGE PHASE III	610 SENIOR WAY	SALISBURY	MD	21801	36	36
MDA20050130	VILLAGE AT MITCHELL POND	1101 PARSONS RD	SALISBURY	MD	21801	68	68
MDA20090110	VICTORIA PARK AT SASSAFRAS	875 VICTORIA PARK DR	SALISBURY	MD	21801	80	80

MDA20140724	LEONARD APTS	800 BOOTH ST	SALISBURY	MD	21801	66	66
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Source: <https://lihtc.huduser.gov/>

There are nineteen (19) LIHTC projects with 1,448 units of affordable rental housing in the City.

Multifamily Housing

The following is a list of HUD Multifamily housing in the City of Salisbury:

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL ASSISTED UNITS	TOTAL UNITS	ASSISTANCE
800009190	DEAF INDEPENDENT RESIDENCE I	5989 Walston Switch Rd	Salisbury	MD	21804	9	9	202/811
800009191	DEAF INDEPENDENT RESIDENCE II	725 Buckingham Circle	Salisbury	MD	21801	12	12	202/811
800009313	Lakeview Apartments	406 TRINITY DR	Salisbury	MD	21801	37	37	202/811
800009363	MOSS HILL TOWNHOUSES	407 Moss Hill Lane	Salisbury	MD	21801	160	200	Insured-Subsidized
800009384	PEMBERTON MANOR APARTMENTS	1020 Fairground Dr	Salisbury	MD	21801	143	209	Subsidized - Previously Insured
800009401	PINE BLUFF VILLAGE	1514 RIVERSIDE DR	Salisbury	MD	21801	150	150	Subsidized, No HUD Financing
800009520	WEST ROAD APARTMENTS	1008 East Road	Salisbury	MD	21801	56	56	Subsidized - Previously Insured
800009540	Village at Mitchell Pond	1115 PARSONS RD	Salisbury	MD	21801	120	68	Insured-Subsidized
800215298	Calloway Street	600 Calloway Street	Salisbury	MD	21804	10	10	202/811
800225171	Victoria Park at Sassafras Meadows	875 Victoria Park Drive	Salisbury	MD	21801	0	80	Insured-Unsubsidized

Source: https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation

There are ten (10) active HUD Multifamily Housing projects with 697 units of affordable rental housing in the City.

7. Planning, Zoning, and Building Codes

City of Salisbury

The City of Salisbury, Maryland has codified its ordinances. The City last amended its zoning code on November 11, 2018 with the passage of Ordinance No. 2507. The Zoning Ordinance is listed as Title 17, Zoning, under the City’s Code of Ordinances.

The City’s Comprehensive Plan appears to be in compliance with the federal regulations governing fair housing. There was previously a need to

update the City's Zoning Ordinance to bring it into compliance with the City's Comprehensive Plan.

The City uses provisions in their Annexation Agreements that require Owners/Developers to pay development assessments to the City on a per lot basis for re-investments in existing neighborhoods and contributions to housing affordability. The development assessments are used by the City in its sole discretion for beautification, restoration, and revitalization improvements to existing neighborhoods and for the promotion of addressing the City's workforce/affordable housing needs and implementation of a workforce housing program.

In reviewing the City's Zoning Ordinance, it is recommended that there is a need to add information, definitions and provisions concerning Fair Housing.

It is recommended that the City include language in the Zoning Ordinance stating the City's commitment to affirmatively further fair housing through its land use regulations and public policies, such as zoning, to promote fair housing choice for all residents in the City of Salisbury. The statement should include mention of the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, as well as identification of the federal protected classes.

The City's Zoning Ordinance does not appear to contain any specific discriminatory language; however, the definitions under "17.04.120 – Definitions" should be reviewed and consideration should be given to revising the definition of family, as well as including additional definitions.

The City should consider including the following definitions: "Fair Housing Act", "Americans with Disabilities Act", "Handicap", and "Reasonable Accommodation."

The Zoning Ordinance defines "Family" as, "Up to a maximum of four persons who are not so related." Definitions that have a limit of four or fewer unrelated adults may be considered discriminatory as the limitation may have an adverse impact on minorities or people with disabilities.

The Federal Courts have ruled that four to six persons with a disability living together in a single-family residence, should be considered a "family" and thereby be permitted to live together as a family in any zoning district that permits residential uses.

The City should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing

Act. A reasonable accommodation policy would allow the City flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

City of Salisbury Building Codes

The City of Salisbury uses the following building codes:

- International Building Code 2015 Edition
- International Residential Code 2015 Edition
- International Mechanical Code, 2015 Edition
- International Energy Conservation Code 2015 Edition
- International Plumbing Code 2015 Edition
- International Fuel Gas Code 2015 Edition
- International Existing Building Code 2015 Edition
- ADA Standards for Accessible Design 2010 ICC/ANSI A117.1
- Electrical Code via Wicomico County
- State of Maryland Fire Prevention Code

The International Building Code (new construction) and the International Existing Building Code (renovation/rehabilitation) are model codes and are in compliance with the federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the Department of Building, Permitting and Inspections. The Building Codes are enforced through plan review and inspections. Interviews with the Department of Inspections staff indicated that developers and contractors are abiding by the State and Federal accessibility regulations and there does not appear to be any blatant violations.

Accessibility Regulations

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” includes the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons. The City of Salisbury appears to be in full compliance with the HUD visitability standards.

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

8. Limited English Proficiency (LEP) Persons

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is discrimination based on a person’s inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

According to the 2013-2017 American Community Survey for the City of Salisbury, 16.7% of residents speak a language other than English at home. Of those residents, 55.6% report that they speak English less than “very well.” The following languages are spoken at home:

English	83.3%
Spanish or Spanish Creole	6.2%
Other Indo-European languages	7.8%

Asian and Pacific Island languages	1.4%
Other languages	1.2%

The two largest non-English speaking populations in the City are Haitian and Spanish speakers.

9. Four Factor Analysis

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. As such, the City has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:

1. Number or Proportion of LEP persons in the population to be served. It is estimated that the City has two non-English speaking populations that exceed the 5% or 1,000 person LEP limit. Those non-English speaking populations are Haitian and Spanish speakers. There are additional non-English speakers in the City but in very limited numbers.

2. Frequency with which LEP persons come into contact with the program activity or service. The City of Salisbury Housing & Community Development Department uses CDBG funds for activities that directly assist City residents, such as housing and public service activities, primarily through subrecipient non-profit provider agencies. Residents are unlikely to have ongoing direct contact with the City's CDBG Program staff. Additionally, the City uses CDBG funds for public infrastructure and facility improvements, projects that do not directly assist City residents. However, the City encourages public participation in the identification and implementation of public infrastructure and facility improvement activities.

According to the FY 2017 CAPER and Report PR-23, the total beneficiaries of CDBG assistance in PY 2017 were 257 individuals; 161 were Black/African American, 87 were White, 5 were Black/African American & White, 1 was Asian & White, 1 was Other, Multi-Racial, and 24 were Hispanic.

3. Importance of the service, information, program, and/or activity. The City's CDBG housing and public service activities are critical to the City's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The City, local advocacy groups and organizations, and its

subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

4. Resources, financial and human, available to the recipient.

Translation and interpretive services are vital for housing and public services activities and would be provided by the City, either through City staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, “Any non-English speaking person wishing to attend the public hearing should contact (Name) at least seven (7) calendar days prior to the meeting and a (Language) interpreter will be provided. This document and program materials are available in (Language) upon request.” These statements will be translated in Haitian Creole and Spanish.

The City does not have a formal written Language Access Plan. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services
- Advertising language services in outreach documents
- Utilize HUD translated documents found at:
https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep

10. Taxes

While real estate tax rates may not be an impediment to fair housing choice, the amount and method of calculation of taxes impacts the affordability of housing especially as it relates to housing in the surrounding area.

Tax Rates in Wicomico County for 2017–2018

JURISDICTION	TAX RATE		
	REAL	PERSONAL	UTILITY
County	0.9398	2.1715	2.1715

Salisbury	0.9832	2.4000	2.8100
Mardela Springs	0.2300	0.5000	0.5000
Pittsville	0.2800	0.9000	0.9000
Sharptown	0.6000	1.5500	1.5500
Delmar	0.7974	2.0000	3.0000
Willards	0.5100	1.1500	1.1500
Hebron	0.4450	1.0000	1.0000
Fruitland	0.9465	1.9200	1.9200

Source: <https://www.wicomicoounty.org/ArchiveCenter/ViewFile/Item/2250>

Real estate tax rates are the highest in the City as compared to the County. Studies have shown that property values tend to appreciate slower in areas of higher effective property tax rates as compared to areas of lower effective property tax rates. This is of course contingent on the real tax rate as it relates to assessed home values.

11. Comprehensive Plan

In 2010, the City of Salisbury began the process of updating its Comprehensive Plan. The goals and outcomes identified for the City are:

Goals –

For the purpose of this Comprehensive Plan, goals articulate the vision by setting the direction for the City of Salisbury as it changes over time. These goals will provide a balanced, sustainable, environmentally sound, and financially secure City where existing and new residents can continue to thrive.

- To use open space, pedestrian and street corridors to strengthen connections between residential neighborhoods, the downtown and employment areas.
- To provide for the appropriate use of limited land resources in the City of Salisbury in an orderly and controlled manner to grow and develop according to the specific needs of the City.

- To promote a compact development pattern and to grow in an orderly and controlled manner that enhances sustainability and provides a livable community.
- To pursue infill annexation opportunities while assuring that future growth does not outpace available public facilities.

Objectives –

Objectives provide the framework to reach the City of Salisbury's goals. For Salisbury, the objectives work to ensure orderly and efficient growth while balancing the welfare of its residents.

- Provide a clear direction for growth in the City, as well as the associated infrastructure and facilities necessary to support future growth and development.
- Redevelop underutilized areas in the City in an appropriate manner for the benefit of existing and future residents, while encouraging responsible and sustainable new development in appropriate areas.
- Provide a comprehensive, balanced transportation system for the safe, convenient, and efficient movement of people, goods, and services among places of residence, employment, shopping and recreation throughout the City.
- Strengthen Main Street and the Downtown Corridor to encourage continued commercial growth while also utilizing valuable resources outside of the Downtown.
- Promote Salisbury as the urban center of the Delmarva Peninsula by creating opportunities to expand into new tourism markets and enhancing existing tourism markets, such as interconnecting the existing hiking and biking trails through the City.
- Provide a variety of public-accessible open space areas and recreational facilities.
- Protect and restore historically- and culturally-significant places throughout Salisbury.
- Improve the quality of housing while offering a variety of housing types in the City to meet different income needs.
- Streamline the annexation process to reduce conflict between the City and Wicomico County, establish clear boundaries between

Salisbury and the surrounding jurisdictions and to update annexation plans as necessary.

- Preserve and conserve the valuable natural resource lands and other sensitive areas in the City to improve the quality of the resource.

The City's Comprehensive Plan does not contain any policy that would impede fair housing choice.

12. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

All Section 3 covered contracts for the City of Salisbury include the following clause (referred to as the Section 3 clause):

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the

labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

The City has identified the following Section 3 Goals:

All CDBG-funded construction contracts that are subject to Section 3 will include the following documents in the attachments to the bid package –

- CDBG Entitlement Program – Salisbury, MD – Special Conditions (for applicable Program Year funding)
- Federal Labor Standards Provisions – HUD-4010
- Supplementary Conditions of the Contract for Construction – HUD-2554
- Copy of Wage Decision for the Project – General Decision Number – Publication Date
- §135.38 Section 3 Clause
- Employee Rights Under the Davis-Bacon Act – English & Spanish Versions (posters to be displayed at the job site)
- Payroll Reporting Form WH347 (with instructions)
- Record of Employee Interview – HUD-11
- Record of Employee Interview – HUD-11 (in Spanish, including instructions)
- Certified Payroll Form – Signature Authorization form
- Certificate of Compliance – Section 3
- Contractor's/Subcontractor's Statement of Workforce Needs
- Contractor's/Subcontractor's Estimated Project Workforce Breakdown

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

C. Private Sector:

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

1. Real Estate Practices

The Coastal Association of REALTORS is the local organization of real estate brokers operating in Somerset, Wicomico, and Worcester Counties. The Realtors Association has an open membership policy and does not discriminate. Members are bound by the Code of Ethics of the National Association of Realtors (NAR). This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively

furthering fair housing. Realtors are required to complete annual continuing education on topics that focus on protecting the rights of persons covered under the Fair Housing Act, the Civil Rights Act, and ADA laws.

2. Real Estate Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several electronic sources such as: Facebook, Craigslist, Realtor.com, Rent.com, RentDelMarVa.com Wicomico Real Estate Now, including *The Daily Times* and *Salisbury Independent*. Some of the sources included a disclaimer from the publisher indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/. The most recent HMDA Data is that of 2017, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Salisbury, MD Metropolitan Statistical Area (MSA). The MSA includes Somerset County, Sussex County, Wicomico County and Worcester County. The boundaries between the City and the County are noncontiguous and Census Tracts can include both City and County residents. The following Census Tracts are specific to the County and were removed from City calculations: 0106.04; 0106.05; 0107.01; and 0108.00. The home loans included in this report represent loans on 1- to 4-family and manufactured homes from the following loan types: 1) FHA, FSA/RHS and VA; 2) Conventional; 3) Refinancings; and 4) Home Improvement.

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan								
Area	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
City of Salisbury	313	50,096	90	16,832	94	17,477	10	691
Wicomico County	354	57,029	104	19,493	120	22,020	13	778
MSA	1292	246,075	1653	431,369	709	160,983	59	8,970
City Loans as a % of County Loans	88.42%	87.84%	86.54%	86.35%	78.33%	79.37%	76.92%	88.82%
City Loans as a % of MSA Loans	24.23%	20.36%	5.44%	3.90%	13.26%	10.86%	16.95%	7.70%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan						
Loan		Loans Originated	Approved, Not Accepted	Applications Denied	Applications Withdrawn	File Closed for Incompleteness
FHA, FSA/RHS & VA	Salisbury	388	6	76	71	11
	Wicomico	472	9	95	86	15
	MSA	1,867	49	334	323	86
Conventional	Salisbury	461	16	79	57	12
	Wicomico	600	25	110	73	15
	MSA	6,565	245	1,030	921	250
Refinancings	Salisbury	380	43	224	165	92

	Wicomico	520	59	322	223	116
	MSA	3,482	352	1,629	1,384	583
Home Improvement Loans	Salisbury	117	3	96	16	5
	Wicomico	161	5	123	24	7
	MSA	797	33	619	118	60

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

The table below lists the lending activity by income group to establish a baseline for lending activity per income.

Disposition of Loan Applications by Income of Applicant												
Loan	Income	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	Less than 50% of MSA/MD median	243	129	53.1%	8	3.3%	72	29.6%	24	9.9%	10	4.1%
	50-79% of MSA/MD median	798	554	69.4%	19	2.4%	108	13.5%	91	11.4%	26	3.3%
	80-99% of MSA/MD median	549	407	74.1%	10	1.8%	53	9.7%	56	10.2%	23	4.2%
	100-119% of MSA/MD median	340	254	74.7%	3	0.9%	30	8.8%	43	12.6%	10	2.9%
	120% or more of MSA/MD median	716	517	72.2%	9	1.3%	65	9.1%	108	15.1%	17	2.4%
Conventional	Less than 50% of MSA/MD median	438	144	32.9%	13	3.0%	208	47.5%	38	8.7%	35	8.0%
	50-79% of MSA/MD median	921	545	59.2%	27	2.9%	196	21.3%	87	9.4%	66	7.2%
	80-99% of MSA/MD median	678	456	67.3%	22	3.2%	101	14.9%	70	10.3%	29	4.3%

	100-119% of MSA/MD median	560	409	73.0%	7	1.3%	77	13.8%	46	8.2%	21	3.8%
	120% or more of MSA/MD median	6,107	4,773	78.2%	152	2.5%	423	6.9%	665	10.9%	94	1.5%
Refinance	Less than 50% of MSA/MD median	633	209	33.0%	26	4.1%	205	32.4%	146	23.1%	47	7.4%
	50-79% of MSA/MD median	1,149	456	39.7%	63	5.5%	307	26.7%	232	20.2%	91	7.9%
	80-99% of MSA/MD median	819	339	41.4%	55	6.7%	215	26.3%	154	18.8%	56	6.8%
	100-119% of MSA/MD median	662	319	48.2%	26	3.9%	145	21.9%	109	16.5%	63	9.5%
	120% or more of MSA/MD median	3,375	1,752	51.9%	145	4.3%	663	19.6%	583	17.3%	232	6.9%
Home Improvement	Less than 50% of MSA/MD median	235	76	32.3%	2	0.9%	144	61.3%	4	1.7%	9	3.8%
	50-79% of MSA/MD median	309	125	40.5%	6	1.9%	142	46.0%	24	7.8%	12	3.9%
	80-99% of MSA/MD median	212	105	49.5%	5	2.4%	82	38.7%	13	6.1%	7	3.3%
	100-119% of MSA/MD median	165	74	44.8%	5	3.0%	65	39.4%	13	7.9%	8	4.8%
	120% or more of MSA/MD median	648	381	58.8%	14	2.2%	167	25.8%	63	9.7%	23	3.5%
Total	Less than 50% of MSA/MD median	1,549	558	36.0%	49	3.2%	629	40.6%	212	13.7%	101	6.5%
	50-79% of MSA/MD median	3,177	1,680	52.9%	115	3.6%	753	23.7%	434	13.7%	195	6.1%
	80-99% of MSA/MD median	2,258	1,307	57.9%	92	4.1%	451	20.0%	293	13.0%	115	5.1%

	100-119% of MSA/MD median	1,727	1,056	61.1%	41	2.4%	317	18.4%	211	12.2%	102	5.9%
	120% or more of MSA/MD median	10,846	7,423	68.4%	320	3.0%	1,318	12.2%	1,419	13.1%	366	3.4%
	TOTAL	19,557	12,024	61.5%	617	3.2%	3,468	17.7%	2,569	13.1%	879	4.5%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

The table below lists the lending activity by racial/ethnic group.

Disposition of Loan Applications by Race/Ethnicity of Applicant												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	13	10	76.9%	1	7.7%	1	7.7%	1	7.7%	0	0.0%
	Asian	20	17	85.0%	0	0.0%	1	5.0%	2	10.0%	0	0.0%
	Black or African American	322	207	64.3%	7	2.2%	49	15.2%	43	13.4%	16	5.0%
	Native Hawaiian or Other Pacific Islander	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	White	1,970	1,435	72.8%	39	2.0%	217	11.0%	221	11.2%	58	2.9%
	2 or more minority races	3	0	0.0%	0	0.0%	2	66.7%	1	33.3%	0	0.0%
	Joint (White/Minority Race)	30	22	73.3%	1	3.3%	3	10.0%	1	3.3%	3	10.0%
	Race Not Available	284	168	59.2%	1	0.4%	54	19.0%	52	18.3%	9	3.2%
	Hispanic or Latino	107	76	71.0%	1	0.9%	13	12.1%	11	10.3%	6	5.6%
Conventional	American Indian/Alaska Native	15	11	73.3%	0	0.0%	3	20.0%	0	0.0%	1	6.7%

	Asian	170	113	66.5%	3	1.8%	22	12.9%	24	14.1%	8	4.7%
	Black or African American	337	133	39.5%	3	0.9%	142	42.1%	19	5.6%	40	11.9%
	Native Hawaiian or Other Pacific Islander	13	7	53.8%	1	7.7%	3	23.1%	1	7.7%	1	7.7%
	White	6,976	5,281	75.7%	186	2.7%	663	9.5%	689	9.9%	157	2.3%
	2 or more minority races	8	2	25.0%	0	0.0%	1	12.5%	4	50.0%	1	12.5%
	Joint (White/Minority Race)	101	69	68.3%	2	2.0%	12	11.9%	12	11.9%	6	5.9%
	Race Not Available	1,078	709	65.8%	26	2.4%	157	14.6%	156	14.5%	30	2.8%
	Hispanic or Latino	196	101	51.5%	6	3.1%	50	25.5%	19	9.7%	20	10.2%
Refinance	American Indian/Alaska Native	19	6	31.6%	0	0.0%	10	52.6%	1	5.3%	2	10.5%
	Asian	55	17	30.9%	6	10.9%	8	14.5%	17	30.9%	7	12.7%
	Black or African American	431	140	32.5%	24	5.6%	138	32.0%	78	18.1%	51	11.8%
	Native Hawaiian or Other Pacific Islander	6	1	16.7%	0	0.0%	2	33.3%	2	33.3%	1	16.7%
	White	4,972	2,453	49.3%	245	4.9%	1,010	20.3%	919	18.5%	345	6.9%
	2 or more minority races	7	1	14.3%	0	0.0%	4	57.1%	2	28.6%	0	0.0%
	Joint (White/Minority Race)	67	26	38.8%	3	4.5%	21	31.3%	10	14.9%	7	10.4%
	Race Not Available	1,072	427	39.8%	37	3.5%	340	31.7%	193	18.0%	75	7.0%
	Hispanic or Latino	133	55	41.4%	7	5.3%	34	25.6%	21	15.8%	16	12.0%

Home Improvement	American Indian/Alaska Native	21	5	23.8%	0	0.0%	14	66.7%	1	4.8%	1	4.8%
	Asian	10	6	60.0%	1	10.0%	2	20.0%	1	10.0%	0	0.0%
	Black or African American	157	53	33.8%	1	0.6%	94	59.9%	7	4.5%	2	1.3%
	Native Hawaiian or Other Pacific Islander	3	1	33.3%	0	0.0%	2	66.7%	0	0.0%	0	0.0%
	White	1,218	633	52.0%	27	2.2%	422	34.6%	90	7.4%	46	3.8%
	2 or more minority races	1	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
	Joint (White/Minority Race)	17	9	52.9%	0	0.0%	6	35.3%	2	11.8%	0	0.0%
	Race Not Available	139	54	38.8%	3	2.2%	58	41.7%	16	11.5%	8	5.8%
	Hispanic or Latino	40	10	25.0%	2	5.0%	22	55.0%	2	5.0%	4	10.0%
Total	American Indian/Alaska Native	68	32	47.1%	1	1.5%	28	41.2%	3	4.4%	4	5.9%
	Asian	255	153	60.0%	10	3.9%	33	12.9%	44	17.3%	15	5.9%
	Black or African American	1,247	533	42.7%	35	2.8%	423	33.9%	147	11.8%	109	8.7%
	Native Hawaiian or Other Pacific Islander	24	11	45.8%	1	4.2%	7	29.2%	3	12.5%	2	8.3%
	White	15,136	9,802	64.8%	497	3.3%	2,312	15.3%	1,919	12.7%	606	4.0%
	2 or more minority races	19	3	15.8%	0	0.0%	7	36.8%	7	36.8%	2	10.5%
	Joint (White/Minority Race)	215	126	58.6%	6	2.8%	42	19.5%	25	11.6%	16	7.4%
	Race Not Available	2,573	1,358	52.8%	67	2.6%	609	23.7%	417	16.2%	122	4.7%

	Hispanic or Latino	476	242	50.8%	16	3.4%	119	25.0%	53	11.1%	46	9.7%
	Total	20,013	12,260	61.3%	633	3.2%	3,580	17.9%	2,618	13.1%	922	4.6%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

The following tables will compare denial rates per racial/ethnic group and income to identify any group that may have higher denial rates than another. Higher denial rates are highlighted.

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
Less than 50% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Asian	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	49	25	51.0%	1	2.0%	17	34.7%	5	10.2%	1	2.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	152	86	56.6%	7	4.6%	36	23.7%	16	10.5%	7	4.6%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	38	15	39.5%	0	0.0%	18	47.4%	3	7.9%	2	5.3%
	Hispanic or Latino	23	14	60.9%	0	0.0%	5	21.7%	2	8.7%	2	8.7%
Conventional	American Indian/Alaska Native	0	0	-	0	-	0	-	0	-	0	-

	Asian	9	3	33.3%	0	0.0%	6	66.7%	0	0.0%	0	0.0%
	Black or African American	79	6	7.6%	0	0.0%	58	73.4%	2	2.5%	13	16.5%
	Native Hawaiian or Other Pacific Islander	1	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%
	White	276	117	42.4%	13	4.7%	101	36.6%	28	10.1%	17	6.2%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	2	0	0.0%	0	0.0%	1	50.0%	0	0.0%	1	50.0%
	Race Not Available	68	18	26.5%	0	0.0%	40	58.8%	7	10.3%	3	4.4%
	Hispanic or Latino	42	13	31.0%	0	0.0%	22	52.4%	2	4.8%	5	11.9%
Refinance	American Indian/Alaska Native	4	0	0.0%	0	0.0%	3	75.0%	0	0.0%	1	25.0%
	Asian	3	0	0.0%	1	33.3%	0	0.0%	2	66.7%	0	0.0%
	Black or African American	79	29	36.7%	2	2.5%	25	31.6%	16	20.3%	7	8.9%
	Native Hawaiian or Other Pacific Islander	2	0	0.0%	0	0.0%	0	0.0%	1	50.0%	1	50.0%
	White	442	152	34.4%	22	5.0%	125	28.3%	113	25.6%	30	6.8%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	101	26	25.7%	1	1.0%	52	51.5%	14	13.9%	8	7.9%
	Hispanic or Latino	13	2	15.4%	1	7.7%	1	7.7%	6	46.2%	3	23.1%
Home Improvement	American Indian/Alaska Native	8	0	0.0%	0	0.0%	6	75.0%	1	12.5%	1	12.5%

	Asian	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Black or African American	46	10	21.7%	0	0.0%	34	73.9%	1	2.2%	2	4.3%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	161	62	38.5%	2	1.2%	91	56.5%	1	0.6%	46	28.6%
	2 or more minority races	0	0	-	0	-	0	-	0	-	1	-
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	18	4	22.2%	0	0.0%	12	66.7%	1	5.6%	8	44.4%
	Hispanic or Latino	11	1	9.1%	0	0.0%	8	72.7%	0	0.0%	4	36.4%
Total	American Indian/Alaska Native	14	2	14.3%	0	0.0%	9	64.3%	1	7.1%	2	14.3%
	Asian	14	4	28.6%	1	7.1%	7	50.0%	2	14.3%	0	0.0%
	Black or African American	253	70	27.7%	3	1.2%	134	53.0%	24	9.5%	23	9.1%
	Native Hawaiian or Other Pacific Islander	3	0	0.0%	0	0.0%	0	0.0%	2	66.7%	1	33.3%
	White	1,031	417	40.4%	44	4.3%	353	34.2%	158	15.3%	100	9.7%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	1	100.0%
	Joint (White/Minority Race)	2	0	0.0%	0	0.0%	1	50.0%	0	0.0%	1	50.0%
	Race Not Available	225	63	28.0%	1	0.4%	122	54.2%	25	11.1%	21	9.3%
	Hispanic or Latino	89	30	33.7%	1	1.1%	36	40.4%	10	11.2%	14	15.7%
	Total	1,632	586	35.9%	50	3.1%	663	40.6%	222	13.6%	163	10.0%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants under 50% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Asian conventional loan denial rate of 66.7% (47.5% Average)
- Black or African American conventional loan denial rate of 73.4% (47.5% Average)
- American Indian/Alaska Native refinance loan denial rate of 75.0% (32.4% Average)
- American Indian/Alaska Native home improvement loan denial rate of 75.0% (61.3% Average)
- Asian home improvement loan denial rate of 100.0% (61.3% Average)
- Black or African American home improvement loan denial rate of 73.9% (61.3% Average)
- Hispanic or Latino home improvement loan denial rate of 72.7% (61.3% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
50-79% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	6	3	50.0%	1	16.7%	1	16.7%	1	16.7%	0	0.0%
	Asian	5	5	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	100	63	63.0%	3	3.0%	17	17.0%	11	11.0%	6	6.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	600	430	71.7%	14	2.3%	77	12.8%	61	10.2%	18	3.0%
	2 or more minority races	1	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%
	Joint (White/Minority Race)	4	2	50.0%	0	0.0%	0	0.0%	1	25.0%	1	25.0%

	Race Not Available	81	51	63.0%	1	1.2%	12	14.8%	16	19.8%	1	1.2%
	Hispanic or Latino	45	35	77.8%	1	2.2%	3	6.7%	3	6.7%	3	6.7%
Conventional	American Indian/Alaska Native	5	2	40.0%	0	0.0%	2	40.0%	0	0.0%	1	20.0%
	Asian	20	13	65.0%	0	0.0%	2	10.0%	5	25.0%	0	0.0%
	Black or African American	72	22	30.6%	0	0.0%	37	51.4%	0	0.0%	13	18.1%
	Native Hawaiian or Other Pacific Islander	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	White	723	454	62.8%	21	2.9%	131	18.1%	77	10.7%	40	5.5%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	6	2	33.3%	0	0.0%	2	33.3%	0	0.0%	2	33.3%
	Race Not Available	92	51	55.4%	6	6.5%	20	21.7%	5	5.4%	10	10.9%
	Hispanic or Latino	41	18	43.9%	1	2.4%	9	22.0%	5	12.2%	8	19.5%
Refinance	American Indian/Alaska Native	5	1	20.0%	0	0.0%	4	80.0%	0	0.0%	0	0.0%
	Asian	4	1	25.0%	2	50.0%	1	25.0%	0	0.0%	0	0.0%
	Black or African American	117	29	24.8%	8	6.8%	43	36.8%	23	19.7%	14	12.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	801	342	42.7%	41	5.1%	184	23.0%	171	21.3%	63	7.9%
	2 or more minority races	3	1	33.3%	0	0.0%	1	33.3%	1	33.3%	0	0.0%
	Joint (White/Minority Race)	12	3	25.0%	2	16.7%	4	33.3%	1	8.3%	2	16.7%

	Race Not Available	205	79	38.5%	10	4.9%	70	34.1%	35	17.1%	11	5.4%
	Hispanic or Latino	36	10	27.8%	4	11.1%	13	36.1%	5	13.9%	4	11.1%
Home Improvement	American Indian/Alaska Native	4	0	0.0%	0	0.0%	4	100.0%	0	0.0%	0	0.0%
	Asian	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	39	12	30.8%	0	0.0%	24	61.5%	3	7.7%	0	0.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	232	107	46.1%	5	2.2%	94	40.5%	18	7.8%	8	3.4%
	2 or more minority races	1	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	100.0%
	Joint (White/Minority Race)	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Race Not Available	30	4	13.3%	1	3.3%	19	63.3%	3	10.0%	3	10.0%
	Hispanic or Latino	7	1	14.3%	1	14.3%	4	57.1%	0	0.0%	1	14.3%
Total	American Indian/Alaska Native	20	6	30.0%	1	5.0%	11	55.0%	1	5.0%	1	5.0%
	Asian	30	20	66.7%	2	6.7%	3	10.0%	5	16.7%	0	0.0%
	Black or African American	328	126	38.4%	11	3.4%	121	36.9%	37	11.3%	33	10.1%
	Native Hawaiian or Other Pacific Islander	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	White	2,356	1,333	56.6%	81	3.4%	486	20.6%	327	13.9%	129	5.5%
	2 or more minority races	6	1	16.7%	0	0.0%	2	33.3%	2	33.3%	1	16.7%
	Joint (White/Minority Race)	23	8	34.8%	2	8.7%	6	26.1%	2	8.7%	5	21.7%
	Race Not Available	408	185	45.3%	18	4.4%	121	29.7%	59	14.5%	25	6.1%

	Hispanic or Latino	129	64	49.6%	7	5.4%	29	22.5%	13	10.1%	16	12.4%
	Total	3,302	1,744	52.8%	122	3.7%	780	23.6%	446	13.5%	210	6.4%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 50-79% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native conventional loan denial rate of 40.0% (21.3% Average)
- Black or African American conventional loan denial rate of 51.4% (21.3% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 50.0% (21.3% Average)
- Two or More Minority Races conventional loan denial rate of 100.0% (21.3% Average)
- Joint conventional loan denial rate of 33.0% (21.3% Average)
- Black or African American refinance loan denial rate of 36.8% (26.7% Average)
- American Indian/Alaska Native home improvement loan denial rate of 75.0% (61.3% Average)
- Black or African American home improvement loan denial rate of 61.5% (46.0% Average)
- Hispanic or Latino home improvement loan denial rate of 57.1% (46.0% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
80-99% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Asian	4	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	71	47	66.2%	1	1.4%	6	8.5%	12	16.9%	5	7.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	414	315	76.1%	8	1.9%	40	9.7%	38	9.2%	13	3.1%

	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	12	7	58.3%	1	8.3%	2	16.7%	0	0.0%	2	16.7%
	Race Not Available	47	33	70.2%	0	0.0%	5	10.6%	6	12.8%	3	6.4%
	Hispanic or Latino	18	13	72.2%	0	0.0%	2	11.1%	2	11.1%	1	5.6%
Conventional	American Indian/Alaska Native	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	Asian	15	9	60.0%	1	6.7%	2	13.3%	2	13.3%	1	6.7%
	Black or African American	36	11	30.6%	0	0.0%	17	47.2%	4	11.1%	4	11.1%
	Native Hawaiian or Other Pacific Islander	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	White	539	385	71.4%	19	3.5%	67	12.4%	50	9.3%	18	3.3%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	6	4	66.7%	0	0.0%	1	16.7%	0	0.0%	1	16.7%
	Race Not Available	78	44	56.4%	2	2.6%	13	16.7%	14	17.9%	5	6.4%
	Hispanic or Latino	25	12	48.0%	2	8.0%	5	20.0%	5	20.0%	1	4.0%
Refinance	American Indian/Alaska Native	2	1	50.0%	0	0.0%	1	50.0%	0	0.0%	0	0.0%
	Asian	7	3	42.9%	1	14.3%	1	14.3%	1	14.3%	1	14.3%
	Black or African American	76	18	23.7%	5	6.6%	32	42.1%	14	18.4%	7	9.2%
	Native Hawaiian or Other Pacific Islander	1	0	0.0%	0	0.0%	0	0.0%	1	100.0%	0	0.0%
	White	592	281	47.5%	43	7.3%	125	21.1%	102	17.2%	41	6.9%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	10	1	10.0%	0	0.0%	7	70.0%	2	20.0%	0	0.0%
	Race Not Available	130	35	26.9%	6	4.6%	48	36.9%	34	26.2%	7	5.4%
	Hispanic or Latino	19	8	42.1%	0	0.0%	7	36.8%	2	10.5%	2	10.5%
Home Improvement	American Indian/Alaska Native	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Asian	1	0	0.0%	1	100.0%	0	0.0%	0	0.0%	0	0.0%

	Black or African American	23	8	34.8%	0	0.0%	15	65.2%	0	0.0%	0	0.0%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	168	87	51.8%	3	1.8%	59	35.1%	12	7.1%	7	4.2%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	3	1	33.3%	0	0.0%	2	66.7%	0	0.0%	0	0.0%
	Race Not Available	16	8	50.0%	1	6.3%	6	37.5%	1	6.3%	0	0.0%
	Hispanic or Latino	3	2	66.7%	0	0.0%	1	33.3%	0	0.0%	0	0.0%
Total	American Indian/Alaska Native	6	4	66.7%	0	0.0%	2	33.3%	0	0.0%	0	0.0%
	Asian	27	16	59.3%	3	11.1%	3	11.1%	3	11.1%	2	7.4%
	Black or African American	206	84	40.8%	6	2.9%	70	34.0%	30	14.6%	16	7.8%
	Native Hawaiian or Other Pacific Islander	2	1	50.0%	0	0.0%	0	0.0%	1	50.0%	0	0.0%
	White	1,713	1,068	62.3%	73	4.3%	291	17.0%	202	11.8%	79	4.6%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	31	13	41.9%	1	3.2%	12	38.7%	2	6.5%	3	9.7%
	Race Not Available	271	120	44.3%	9	3.3%	72	26.6%	55	20.3%	15	5.5%
	Hispanic or Latino	65	35	53.8%	2	3.1%	15	23.1%	9	13.8%	4	6.2%
	Total	2,322	1,341	57.8%	94	4.0%	466	20.1%	302	13.0%	119	5.1%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 80-99% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native conventional loan denial rate of 50.0% (14.9% Average)
- Black or African American conventional loan denial rate of 47.2% (14.9% Average)
- American Indian/Alaska Native refinance loan denial rate of 50.0% (26.3% Average)
- Black or African American refinance loan denial rate of 42.1% (26.3% Average)

- Two or More Minority Races refinance loan denial rate of 100.0% (26.3% Average)
- Joint refinance loan denial rate of 70.0% (26.3% Average)
- Hispanic or Latino refinance loan denial rate of 36.8% (26.3% Average)
- Black or African American home improvement loan denial rate of 65.2% (38.7% Average)
- Joint home improvement loan denial rate of 66.7% (38.7% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
100-119% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Asian	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	39	29	74.4%	2	5.1%	2	5.1%	5	12.8%	1	2.6%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	250	193	77.2%	1	0.4%	21	8.4%	27	10.8%	8	3.2%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	4	4	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Race Not Available	44	25	56.8%	0	0.0%	7	15.9%	11	25.0%	1	2.3%
	Hispanic or Latino	7	6	85.7%	0	0.0%	0	0.0%	1	14.3%	0	0.0%
Conventional	American Indian/Alaska Native	0	0	-	0	-	0	-	0	-	0	-
	Asian	13	10	76.9%	0	0.0%	1	7.7%	0	0.0%	2	15.4%
	Black or African American	18	7	38.9%	0	0.0%	6	33.3%	1	5.6%	4	22.2%
	Native Hawaiian or Other Pacific Islander	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	White	462	356	77.1%	6	1.3%	53	11.5%	37	8.0%	10	2.2%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-

	Joint (White/Minority Race)	7	1	14.3%	0	0.0%	3	42.9%	1	14.3%	2	28.6%
	Race Not Available	59	35	59.3%	1	1.7%	13	22.0%	7	11.9%	3	5.1%
	Hispanic or Latino	15	9	60.0%	0	0.0%	4	26.7%	1	6.7%	1	6.7%
Refinance	American Indian/Alaska Native	0	0	-	0	-	0	-	0	-	0	-
	Asian	3	1	33.3%	0	0.0%	0	0.0%	2	66.7%	0	0.0%
	Black or African American	41	16	39.0%	1	2.4%	7	17.1%	9	22.0%	8	19.5%
	Native Hawaiian or Other Pacific Islander	1	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	White	511	258	50.5%	20	3.9%	104	20.4%	80	15.7%	49	9.6%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	4	2	50.0%	0	0.0%	1	25.0%	0	0.0%	1	25.0%
	Race Not Available	101	41	40.6%	5	5.0%	32	31.7%	18	17.8%	5	5.0%
	Hispanic or Latino	19	7	36.8%	1	5.3%	5	26.3%	2	10.5%	4	21.1%
Home Improvement	American Indian/Alaska Native	2	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%
	Asian	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Black or African American	17	7	41.2%	0	0.0%	7	41.2%	3	17.6%	0	0.0%
	Native Hawaiian or Other Pacific Islander	3	1	33.3%	0	0.0%	2	66.7%	0	0.0%	0	0.0%
	White	122	57	46.7%	5	4.1%	46	37.7%	6	4.9%	8	6.6%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	19	7	36.8%	0	0.0%	8	42.1%	4	21.1%	0	0.0%
	Hispanic or Latino	6	1	16.7%	0	0.0%	4	66.7%	1	16.7%	0	0.0%
Total	American Indian/Alaska Native	3	1	33.3%	0	0.0%	2	66.7%	0	0.0%	0	0.0%
	Asian	20	15	75.0%	0	0.0%	1	5.0%	2	10.0%	2	10.0%
	Black or African American	115	59	51.3%	3	2.6%	22	19.1%	18	15.7%	13	11.3%

	Native Hawaiian or Other Pacific Islander	5	2	40.0%	0	0.0%	3	60.0%	0	0.0%	0	0.0%
	White	1,345	864	64.2%	32	2.4%	224	16.7%	150	11.2%	75	5.6%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	15	7	46.7%	0	0.0%	4	26.7%	1	6.7%	3	20.0%
	Race Not Available	223	108	48.4%	6	2.7%	60	26.9%	40	17.9%	9	4.0%
	Hispanic or Latino	47	23	48.9%	1	2.1%	13	27.7%	5	10.6%	5	10.6%
	Total	1,774	1,079	60.8%	42	2.4%	330	18.6%	216	12.2%	107	6.0%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 100-119% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Black or African American conventional loan denial rate of 33.3% (13.8% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 100.0% (13.8% Average)
- Joint conventional loan denial rate of 42.9% (13.8% Average)
- Hispanic or Latino conventional loan denial rate of 26.7% (13.8% Average)
- Two or More Minority Races refinance loan denial rate of 100.0% (21.9% Average)
- American Indian/Alaska Native home improvement loan denial rate of 100.0% (39.4% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 66.7% (39.4% Average)
- Hispanic or Latino home improvement loan denial rate of 66.7% (39.4% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
120% or More of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RH S and	American Indian/Alaska Native	3	3	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%

	Asian	8	5	62.5%	0	0.0%	1	12.5%	2	25.0%	0	0.0%
	Black or African American	63	43	68.3%	0	0.0%	7	11.1%	10	15.9%	3	4.8%
	Native Hawaiian or Other Pacific Islander	2	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	White	554	411	74.2%	9	1.6%	43	7.8%	79	14.3%	12	2.2%
	2 or more minority races	1	0	0.0%	0	0.0%	1	100.0%	0	0.0%	0	0.0%
	Joint (White/Minority Race)	10	9	90.0%	0	0.0%	1	10.0%	0	0.0%	0	0.0%
	Race Not Available	74	44	59.5%	0	0.0%	12	16.2%	16	21.6%	2	2.7%
	Hispanic or Latino	14	8	57.1%	0	0.0%	3	21.4%	3	21.4%	0	0.0%
Conventional	American Indian/Alaska Native	8	8	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Asian	113	78	69.0%	2	1.8%	11	9.7%	17	15.0%	5	4.4%
	Black or African American	132	87	65.9%	3	2.3%	24	18.2%	12	9.1%	6	4.5%
	Native Hawaiian or Other Pacific Islander	8	5	62.5%	1	12.5%	1	12.5%	0	0.0%	1	12.5%
	White	4,976	3,969	79.8%	127	2.6%	311	6.3%	497	10.0%	72	1.4%
	2 or more minority races	7	2	28.6%	0	0.0%	0	0.0%	4	57.1%	1	14.3%
	Joint (White/Minority Race)	80	62	77.5%	2	2.5%	5	6.3%	11	13.8%	0	0.0%
	Race Not Available	781	561	71.8%	17	2.2%	71	9.1%	123	15.7%	9	1.2%
	Hispanic or Latino	73	49	67.1%	3	4.1%	10	13.7%	6	8.2%	5	6.8%
Refinance	American Indian/Alaska Native	8	4	50.0%	0	0.0%	2	25.0%	1	12.5%	1	12.5%

	Asian	38	12	31.6%	2	5.3%	6	15.8%	12	31.6%	6	15.8%
	Black or African American	118	48	40.7%	8	6.8%	31	26.3%	16	13.6%	15	12.7%
	Native Hawaiian or Other Pacific Islander	2	0	0.0%	0	0.0%	2	100.0%	0	0.0%	0	0.0%
	White	2,626	1,420	54.1%	119	4.5%	472	18.0%	453	17.3%	162	6.2%
	2 or more minority races	2	0	0.0%	0	0.0%	1	50.0%	1	50.0%	0	0.0%
	Joint (White/Minority Race)	41	20	48.8%	1	2.4%	9	22.0%	7	17.1%	4	9.8%
	Race Not Available	535	246	46.0%	15	2.8%	138	25.8%	92	17.2%	44	8.2%
	Hispanic or Latino	46	28	60.9%	1	2.2%	8	17.4%	6	13.0%	3	6.5%
Home Improvement	American Indian/Alaska Native	6	4	66.7%	0	0.0%	2	33.3%	0	0.0%	0	0.0%
	Asian	5	3	60.0%	0	0.0%	1	20.0%	1	20.0%	0	0.0%
	Black or African American	32	16	50.0%	1	3.1%	14	43.8%	0	0.0%	1	3.1%
	Native Hawaiian or Other Pacific Islander	0	0	-	0	-	0	-	0	-	0	-
	White	535	320	59.8%	12	2.2%	132	24.7%	53	9.9%	18	3.4%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	13	7	53.8%	0	0.0%	4	30.8%	2	15.4%	0	0.0%
	Race Not Available	56	31	55.4%	1	1.8%	13	23.2%	7	12.5%	4	7.1%
	Hispanic or Latino	13	5	38.5%	1	7.7%	5	38.5%	1	7.7%	1	7.7%
Total	American Indian/Alaska Native	25	19	76.0%	0	0.0%	4	16.0%	1	4.0%	1	4.0%

Asian	164	98	59.8%	4	2.4%	19	11.6%	32	19.5%	11	6.7%
Black or African American	345	194	56.2%	12	3.5%	76	22.0%	38	11.0%	25	7.2%
Native Hawaiian or Other Pacific Islander	12	7	58.3%	1	8.3%	3	25.0%	0	0.0%	1	8.3%
White	8,691	6,120	70.4%	267	3.1%	958	11.0%	1,082	12.4%	264	3.0%
2 or more minority races	10	2	20.0%	0	0.0%	2	20.0%	5	50.0%	1	10.0%
Joint (White/Minority Race)	144	98	68.1%	3	2.1%	19	13.2%	20	13.9%	4	2.8%
Race Not Available	1,446	882	61.0%	33	2.3%	234	16.2%	238	16.5%	59	4.1%
Hispanic or Latino	146	90	61.6%	5	3.4%	26	17.8%	16	11.0%	9	6.2%
Total	10,983	7,510	68.4%	325	3.0%	1,341	12.2%	1,432	13.0%	375	3.4%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 120% and over MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Two or More Minority Races FHA, FSA/RHS and VA loan denial rate of 100.0% (9.1% Average)
- Hispanic or Latino FHA, FSA/RHS and VA loan denial rate of 21.4% (9.1% Average)
- Black or African American conventional loan denial rate of 18.2% (6.9% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 100.0% (19.6% Average)
- Two or More Minority Races refinance loan denial rate of 50.0% (19.6% Average)
- Black or African American home improvement loan denial rate of 43.8% (25.8% Average)
- Hispanic or Latino home improvement loan denial rate of 38.5% (25.8% Average)

4. Insurance

There was not suitable data available to determine if discrepancies existed in the rates and amounts of insurance coverage available to minority

households in the City of Salisbury. Further investigation and assessment are needed to determine if there is a barrier to fair housing choice.

C. Citizen Participation:

The City of Salisbury, in compliance with the City's Citizen Participation Plan, advertised and held two (2) public hearings on the impediments to fair housing choice in the City of Salisbury that provided residents with the opportunity to discuss the City's AI and to offer their suggestions. The public hearings were broadcast live on Cable Channel PAC 14 and were rebroadcast three times after the original broadcast. A "Draft Plan" was placed on display on the City's website at <https://salisbury.md/departments/housing-community-development> under the Housing & Community Development Department web page and copies of the plan were available at the Department of Housing & Community Development, 207 West Main Street, Suite 102, Salisbury, MD 21801 and at the Wicomico Public Library, 122 South Division Street, Salisbury, MD 21801, from April 23, 2019 until May 24, 2019 for review and comment.

Additionally, the City advertised an online citizen's survey <https://www.surveymonkey.com/s/CityofSalisbury>. The City developed the AI based on the input received at the public hearings, draft plan review comments, and the citizen's survey.

V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the City of Salisbury to affirmatively further fair housing in the community. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented in chart format on the pages that follow.

The City of Salisbury’s PY 2019-2023 Analysis of Impediments to Fair Housing Choice has identified the following impediments, as well as defined specific goals and strategies to address each impediment.

- **Impediment 1: Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA) and awareness of discriminatory practices.

Goal: Improve the knowledge and awareness of both the public and the local officials of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the community.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **1-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-B:** Continue to educate and make realtors, bankers, and housing providers aware of their responsibilities under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **1-C:** Continue to support Fair Housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination and/or not aware of how to file a housing complaint.
- **1-D:** Continue to identify LEP persons to provide the specific language assistance that is needed.
- **1-E:** Continue to partner with regional jurisdictions and housing providers to encourage fair housing choice throughout the eastern shore.

- **Impediment 2: Continuing Need for Affordable Housing**

Two out of every three renter households in the City are paying over 30% of their monthly incomes on housing costs. One out of every three owner households with a mortgage is paying over 30% of their monthly income on housing costs.

Goal: Increase the supply of affordable housing by new construction and rehabilitation of various types of housing that is affordable to lower income households.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable and mixed-income housing located outside of areas of lower income and minority concentrations.
- **2-B:** Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, sound and affordable housing for households below 80% AMI.
- **2-C:** Continue to support homebuyer education and training programs to improve homebuyer awareness.
- **2-D:** Provide federal, state and local funding in response to HMDA data discrimination patterns to support a higher loan to value ratio for minority homebuyers.
- **2-E:** Continue to update the information available on the Affordable Housing Resources database located on the City of Salisbury website.

- **Impediment 3: Continuing Need for Accessible Housing**

There is a lack of accessible housing units in the City of Salisbury as the supply of accessible housing has not kept pace with the demand of individuals desiring to live independently.

Goal: Increase the supply of accessible housing by new construction and rehabilitation of accessible housing for persons who are disabled.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:

- **3-A:** Continue to promote the need for accessible housing by supporting and encouraging private developers and non-profits to

develop, construct, and/or rehabilitate housing that is accessible to persons who are disabled.

- **3-B:** Continue to provide financial assistance for accessibility improvements to owner-occupied housing units to enable the elderly and/or disabled to remain in their existing homes.
- **3-C:** Continue to enforce the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so they become accessible to tenants who are disabled.
- **3-D:** Continue to update the information, including accessibility and visitability, available on the Affordable Housing Resources database located on the City of Salisbury website.

- **Impediment 4: Public Policy**

The City Zoning Ordinance needs additional definitions and provisions concerning Fair Housing.

Goal: Revise the City Zoning Ordinance to promote the development of various types of affordable housing throughout the City.

Strategies: In order to meet this goal, the following activities and strategies should be undertaken:












- **4-A:** Revise the City Zoning Ordinance to include additional definitions, statements, and revisions.
- **4-B:** Adopt a written Reasonable Accommodation Policy for housing developers and the Planning/Zoning Commission to follow when reasonable accommodation requests are made concerning zoning and land use as it applies to protected classes under the Fair Housing Act.
- **4-C:** Develop financial incentives to encourage developers and housing providers to offer more affordable housing options in the City.
- **4-D:** Appoint City residents to the City’s CDBG Committee.

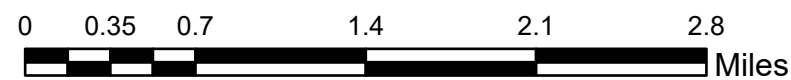
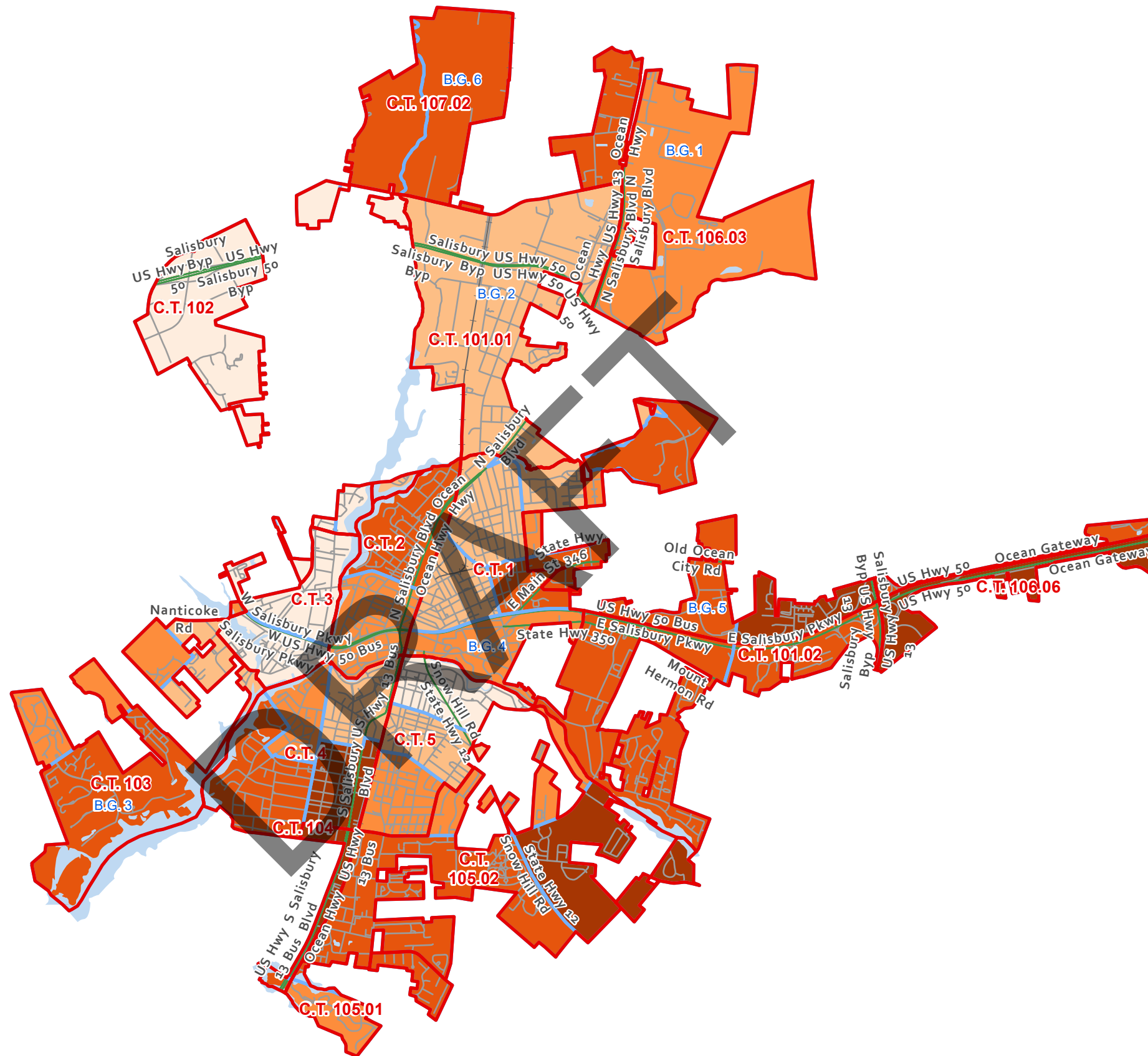
VI. Maps

The following maps are attached:

- Percent White Population by Block Group
- Percent Minority Population by Block Group
- Percent Population Age 65 and Over by Block Group
- Housing Density by Block Group
- Percent Owner Occupied Housing Units by Block Group
- Percent Renter Occupied Housing Units by Block Group
- Low- and Moderate-Income Percentage by Block Group







DRAFT

-  Block Groups
 -  Census Tracts
 -  Rivers
 -  Major Roads
 -  Railroads
 -  Roads
 - Percent White Population
By Block Group
 -  0% - 19.8%
 -  19.9% - 42.9%
 -  50.0% - 65.4%
 -  65.5% - 79.6%
 -  79.7% - 100%
- Source: 2013-2017 ACS 5-Year Estimates








CITY OF SALISBURY, WICOMICO COUNTY, MD PERCENTAGE OF WHITE BY BLOCK GROUP

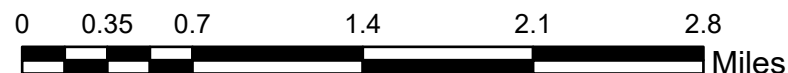
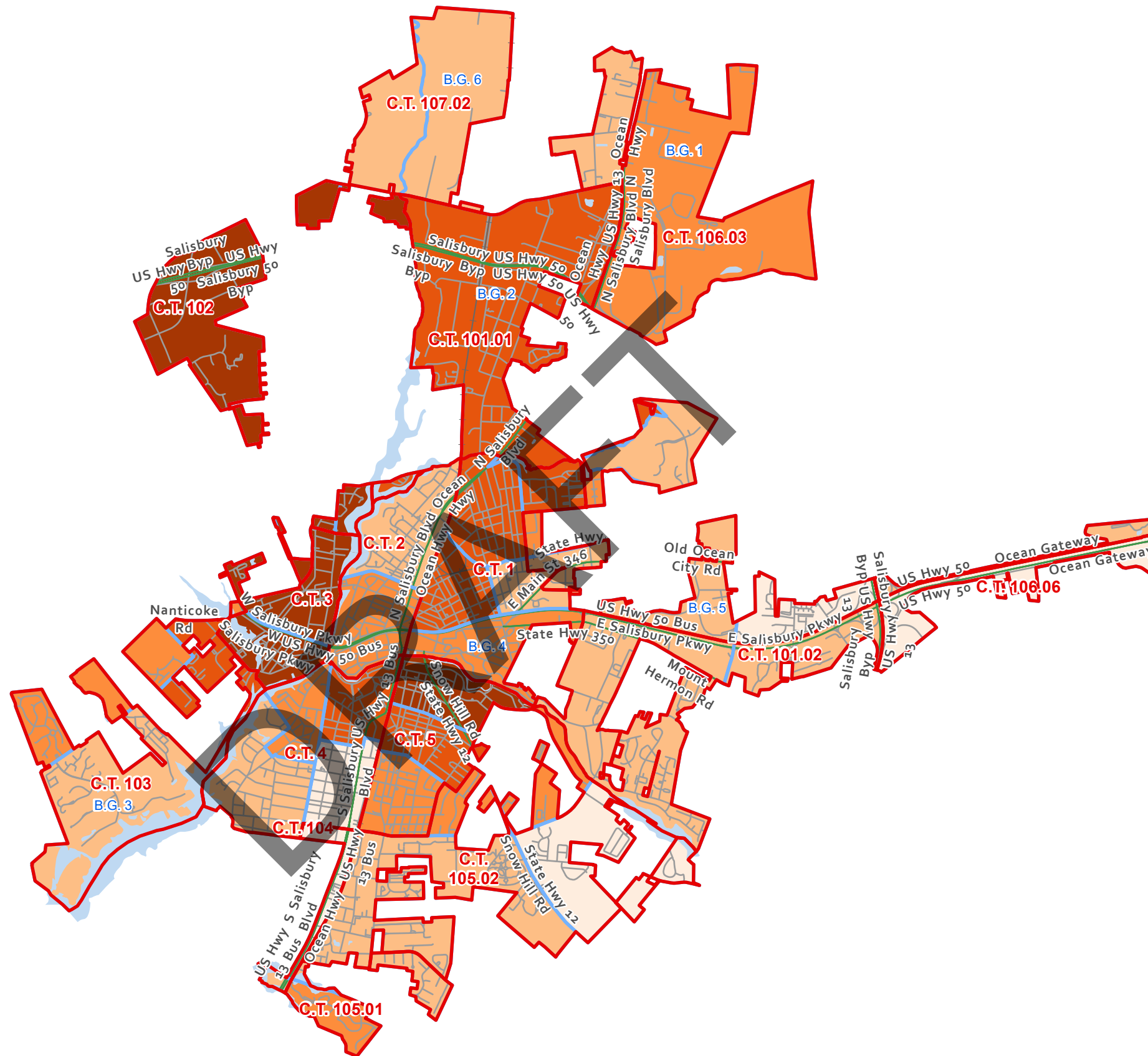
LEGEND:

-  Block Groups
-  Census Tracts
-  Rivers
-  Major Roads
-  Railroads
-  Roads

**Percent Minority Population
By Block Group**

-  0% - 14.4%
-  14.5% - 31.4%
-  31.5% - 50.0%
-  50.1% - 75.2%
-  75.3% - 100%

Source: 2013-2017 ACS 5-Year Estimates



CITY OF SALISBURY, WICOMICO COUNTY, MD PERCENTAGE OF MINORITIES BY BLOCK GROUP



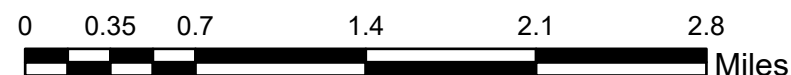
LEGEND:

- Block Groups
- Census Tracts
- Rivers
- Major Roads
- Railroads
- Roads

**Percent 65+ Population
By Block Group**

- 0% - 7.4%
- 7.5% - 13.2%
- 13.3% - 20.2%
- 20.3% - 28.6%
- 28.7% - 43.2%

Source: 2013-2017 ACS 5-Year Estimates



CITY OF SALISBURY, WICOMICO COUNTY, MD PERCENTAGE OF AGE 65+ BY BLOCK GROUP



LEGEND:

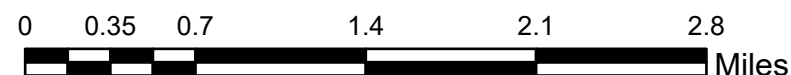
- Block Groups
- Census Tracts
- Rivers
- Major Roads
- Railroads
- Roads

Housing Units per Square Mile

By Block Group

- ≤0.00009817
- ≤0.0002776
- ≤0.0005100
- ≤0.0008701
- ≤0.001346







Source: 2013-2017 ACS 5-Year Estimates



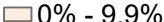

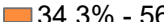
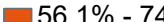
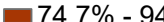
CITY OF SALISBURY, WICOMICO COUNTY, MD HOUSING UNIT DENSITY BY BLOCK GROUP



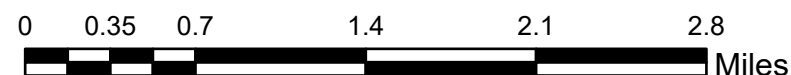
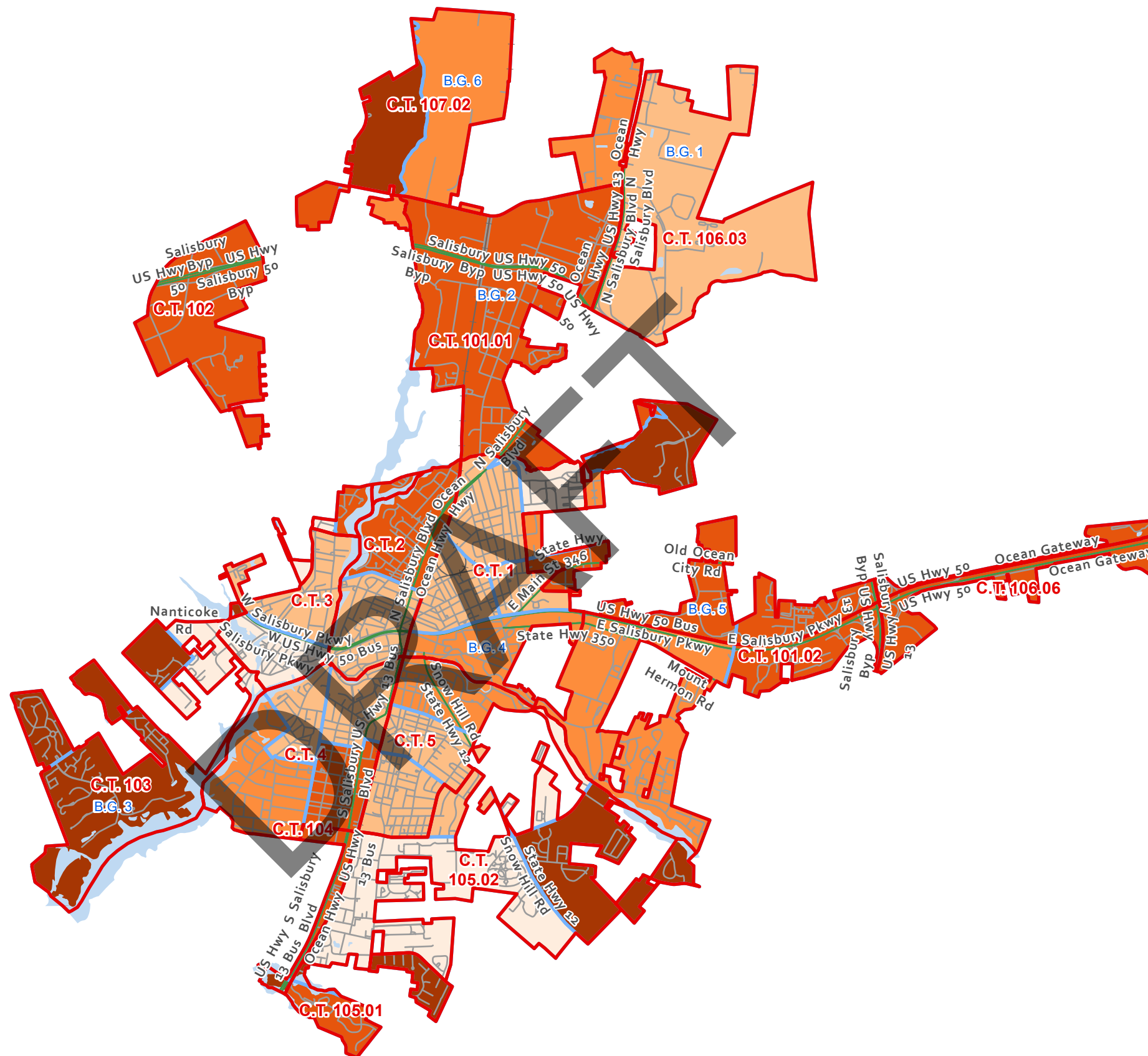
LEGEND:

-  Block Groups
-  Census Tracts
-  Rivers
-  Major Roads
-  Railroads
-  Roads

Percent Owner-Occupied Population
By Block Group

-  0% - 9.9%
-  10.0% - 34.2%
-  34.3% - 56.0%
-  56.1% - 74.6%
-  74.7% - 94.6%







Source: 2013-2017 ACS 5-Year Estimates








CITY OF SALISBURY, WICOMICO COUNTY, MD OWNER-OCCUPIED HOUSING BY BLOCK GROUP



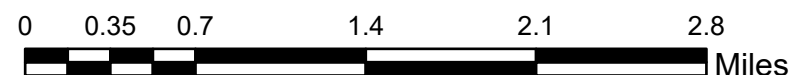
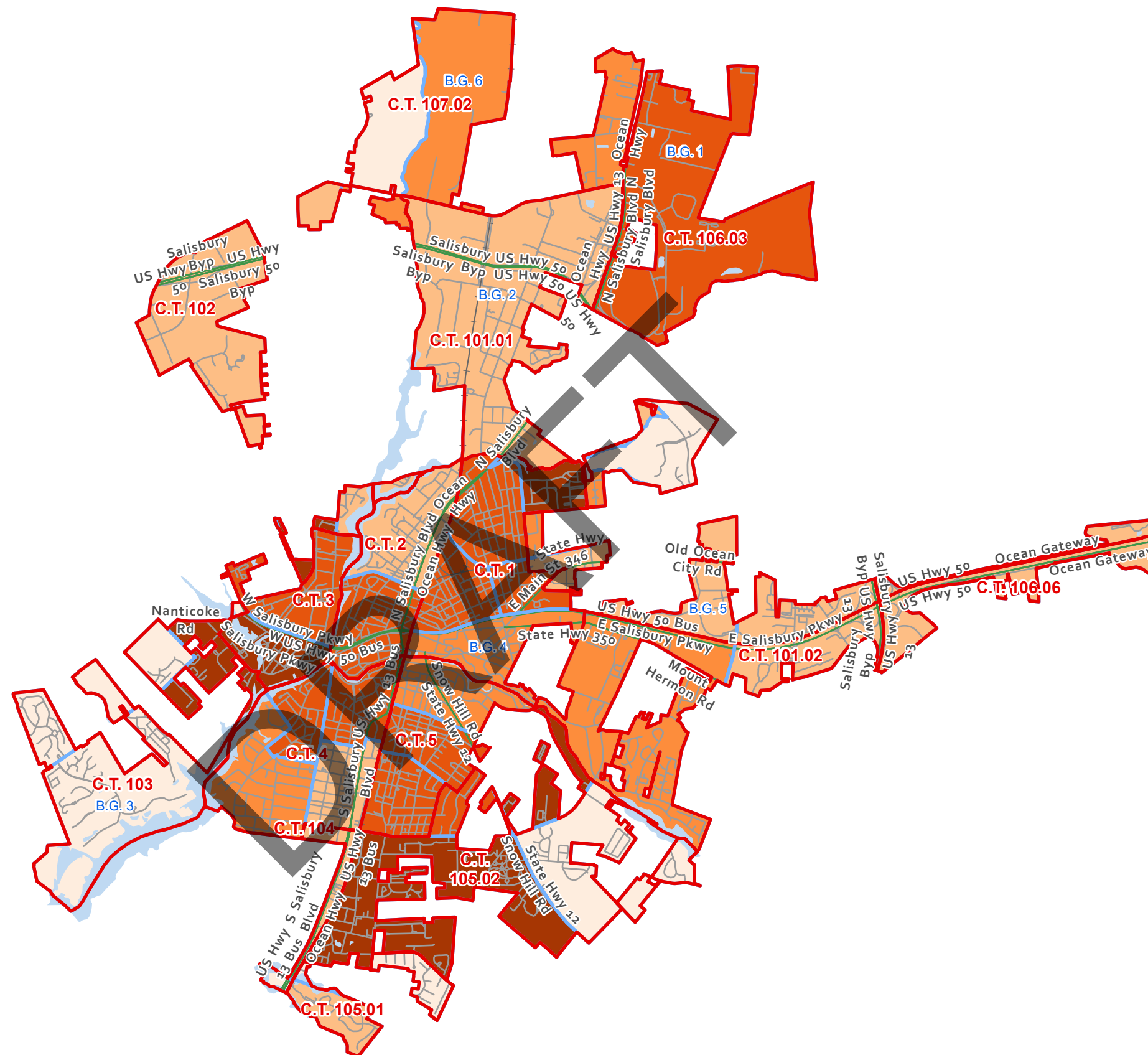
LEGEND:

-  Block Groups
-  Census Tracts
-  Rivers
-  Major Roads
-  Railroads
-  Roads

Percent of Renters
By Block Group

-  0% - 21.1%
-  21.2% - 41.7%
-  41.8% - 56.9%
-  60.0% - 84.7%
-  84.8% - 100%

Source: 2013-2017 ACS 5-Year Estimates

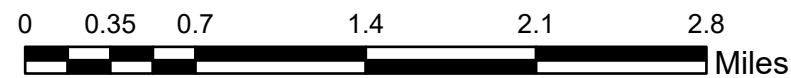
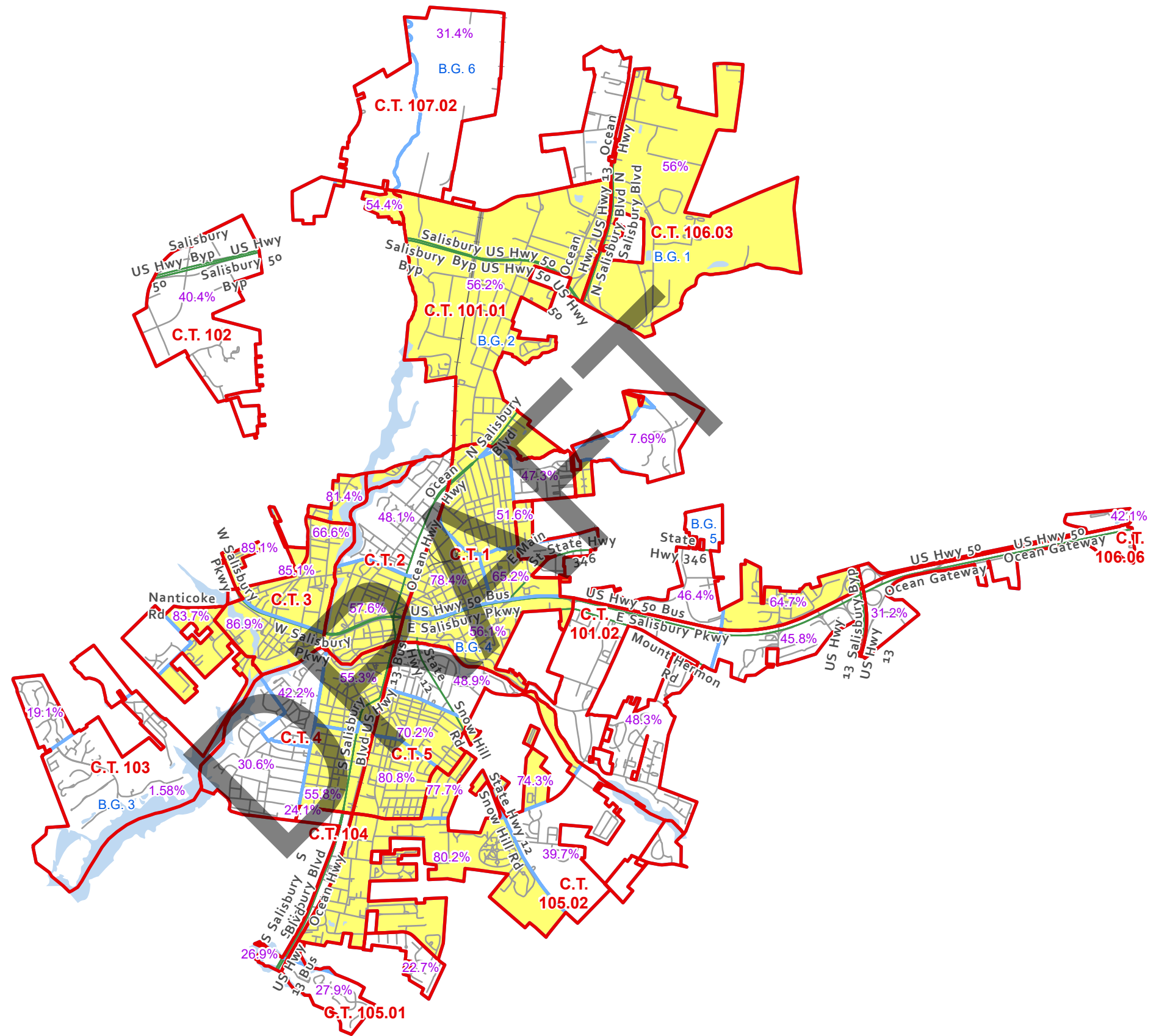


CITY OF SALISBURY, WICOMICO COUNTY, MD RENTER-OCCUPIED HOUSING BY BLOCK GROUP



LEGEND:

- Block Groups
 - Census Tracts
 - Railroads
 - City Streets/Roads
 - Rivers
 - Block Group Parts by Low/Moderate Income Percentage
 - Less than 51%
 - 51% or More
- Source: 2011-2015 ACS



CITY OF SALISBURY, WICOMICO COUNTY, MD 2019 CENSUS TRACTS/BLOCK GROUPS MAP

