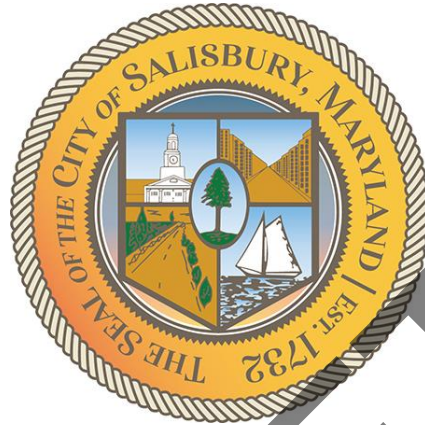


# City of Salisbury



## 2024 Analysis of Impediments to Fair Housing Choice

**CDBG PY 2024-2028**  
**(7/1/2024 – 6/30/2028)**

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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 an 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 address those impediments. HUD advises communities that the Analysis of Impediments to Fair Housing Choice should 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 advises 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 entitlement community, as part of its Annual Action Plan, must sign certifications that the jurisdiction will affirmatively further fair housing. This means that the entitlement community 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 previously prepared an Analysis of Impediments to Fair Housing Choice in May 2019. 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 23, 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). This plan was prepared according to HUD's Office of Fair Housing and Equal Opportunity's Fair Housing Planning Guide.

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

- 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.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**

- Review of the 2019 Analysis of Impediments to Fair Housing Choice, Zoning Ordinances, Comprehensive Plan, Five Year Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance Evaluation Reports.
- Review of the Housing Authority's Five Year and Annual PHA Plans.
- Review of the most recent demographic data for the area from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
- Review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data.
- Review of the residential segregation data.
- 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 public meetings.

- 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 area was analyzed.
  - Five Year Consolidated Plan 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 publicized, 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/r/SalisburyCDBG24-28> from January 4, 2024 until February 16, 2024.
- **Key Findings**
  - There is a lack of affordable housing for all income levels in the City of Salisbury.
  - There is a lack of new housing construction to meet housing demand, especially owner-occupied housing units.
  - The housing stock in the City is older and in need of rehabilitation.
  - There are areas of minority housing concentration that correspond to areas of lower income concentration.

- There are substantially more renter-occupied housing units than owner-occupied housing units.
- Household incomes have increased at slower rates than housing costs.
- There is a lack of zoning provisions that encourage fair housing choice.
- Communication issues exist for Limited English Proficiency (LEP) persons.

In the updated Analysis of Impediments, the City identified the following goals and strategies to address impediments identified:

### **Impediment 1 Need for Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights and responsibilities of individuals, families, members of the protected classes, landlords, real estate professionals, and public officials under the Fair Housing Act (FHA).

Goal: Improve the public's knowledge and awareness 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 actions should be undertaken:

- 1-A: Educate residents, realtors, bankers, housing providers, other real estate professionals, policy makers and municipal staff of their responsibilities under the fair housing and related statutes, regulations, and executive orders.
- 1-B: Support fair housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination.
- 1-C: Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.

### **Impediment 2 Need for Affordable Housing**

In the City of Salisbury, one out of every two (52%) renter households is paying over 30% of their monthly incomes on housing costs; one out of every four (24%) owner households with a mortgage is paying over 30% of their monthly income on housing costs; and one out of every six (16%) owner households without a mortgage is paying over 30% of their monthly income on housing costs. The number of households that are housing cost burdened significantly increases as household income decreases.

Goal: Increase the supply of decent, safe, and sanitary housing that is affordable and accessible through the new construction and rehabilitation of various types of housing, especially housing that is affordable to lower income households.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 2-A: Support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable mixed-income housing.
- 2-B: Support and encourage the rehabilitation of existing renter-occupied and owner-occupied housing units in the area for households below 80% AMI.
- 2-C: Support homebuyer education, training programs, and closing cost/down payment assistance to increase the number of owner-occupied housing units; especially in response to HMDA data discrimination patterns to support higher loan to value ratios for minority homebuyers.
- 2-D: Support tenant education and maintenance training programs to encourage and support healthy rental housing units.
- 2-E: Encourage organizations serving the LMI community to develop relationships with landlords to expand the supply of affordable rental housing units.
- 2-F: Encourage affirmative marketing procedures to attract protected classes that are least likely to apply for new affordable housing opportunities.

### **Impediment 3 Need for Accessible Housing**

There is a lack of accessible housing units in the area 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 through new construction and rehabilitation of accessible housing for persons with disabilities.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 3-A: Promote the need for accessible and visitable housing by supporting and encouraging private developers and non-profits to develop, construct, or rehabilitate housing that is accessible to persons with disabilities.
- 3-B: Provide financial assistance for accessibility improvements to housing units to enable seniors and persons with disabilities to remain in their homes.
- 3-C: Promote and encourage the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so the units are accessible to tenants.

#### **Impediment 4 Public Policy**

The City's Zoning Ordinance needs additional definitions and provisions to affirmatively further fair housing.

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

Strategies: In order to meet this goal, the following actions should be undertaken:

- 4-A Revise the City Zoning Ordinance to include additional definitions, statements, and revisions that adopt model fair housing zoning provisions including reasonable accommodations, transit-oriented development, and regional cooperation.
- 4-B Develop incentives to encourage developers and housing providers to offer more affordable housing options in the City.
- 4-C Encourage LMI, minority, and protected class resident participation in the various City Boards and Commissions.

#### **Impediment 5 Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.

Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 5-A: Form a regional fair housing partnership with existing organizations to encourage fair housing choice throughout the area, fair housing activities, and projects.
- 5-B: Maintain a regional database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.
- 5-C: Work collaboratively with affordable housing developers and providers to ensure affirmative fair marketing plans and deconcentration policies are created and implemented.
- 5-D: Support the Wicomico County Housing Authority to affirmatively further fair housing.



Fair housing is a right. The City is committed to promoting housing choice, which entails increasing free and equal access to residential housing throughout the City of Salisbury. The City will direct federal funds to address impediments to housing choice that inhibit an individual's pursuit of personal, educational, and employment goals. If you have any questions or comments, please send them to the City's Fair Housing Designated Officer:

Muir Boda, Director  
Housing and Community Development Department  
City of Salisbury  
207 W. Main St.  
Salisbury, MD 21801  
(410) 341-9550

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## I. Introduction

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.

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 of Salisbury into sequence with their PY 2024-2028 Five Year Consolidated Plan. The document is designed to act as a planning tool, providing the City 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.

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## 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, 2013-2017 American Community Survey (ACS), 2018-2022 American Community Survey (ACS), 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. To maintain consistency with the Five Year Consolidated Plan, the 2013-2017 American Community Survey (ACS) was used in most instances in place of the most recent 2018-2022 American Community Survey (ACS) data. 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.

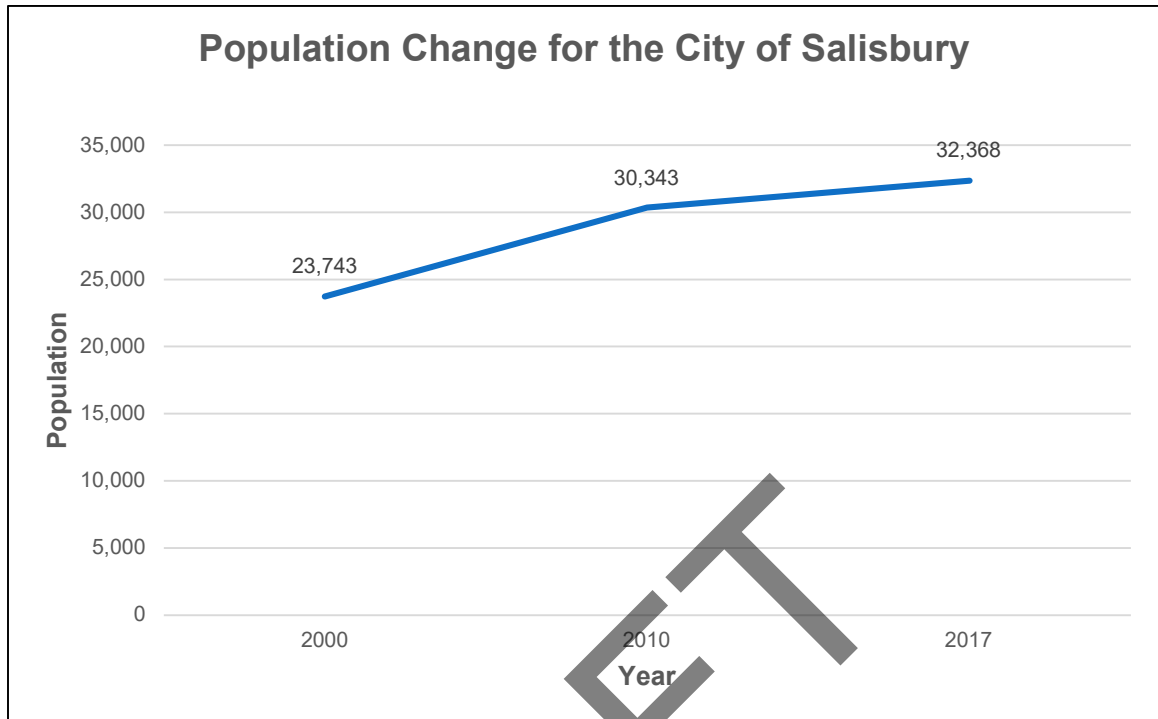
### A. Population, Race, Ethnicity, and Religion

#### 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%.



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.

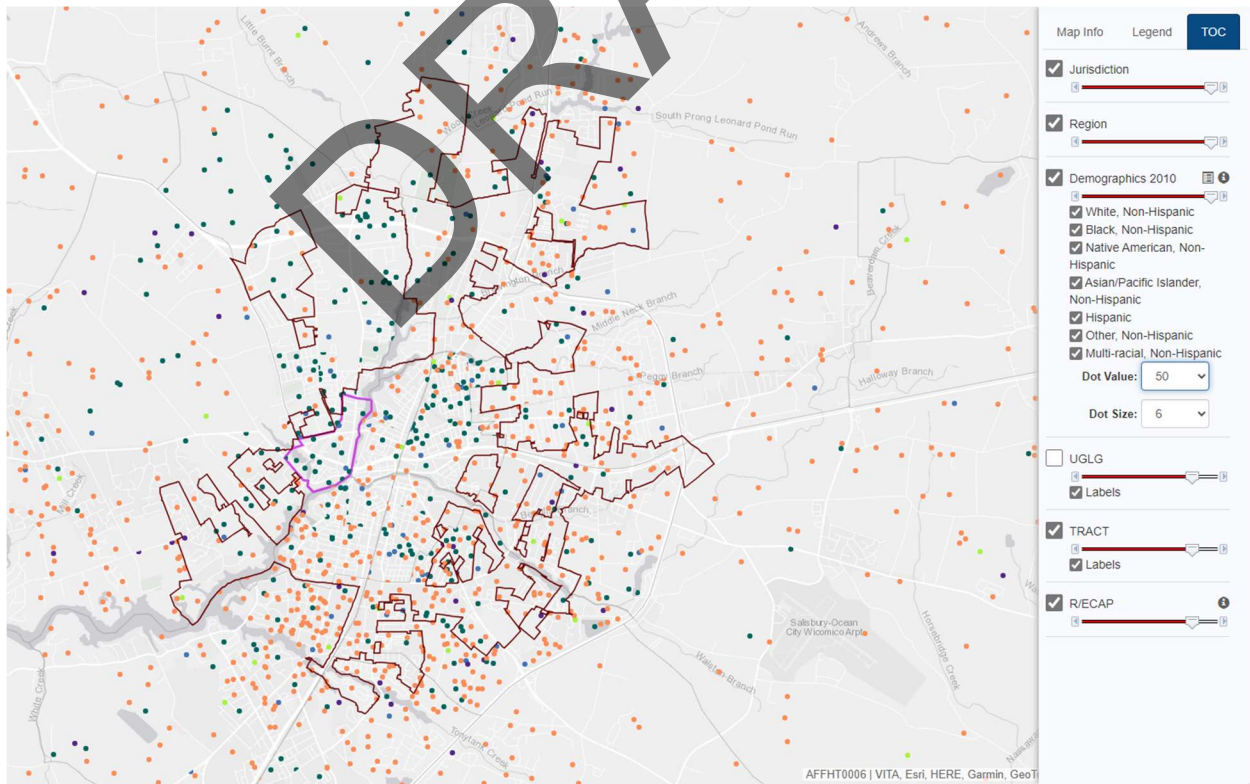
### Race and Hispanic or Latino Population in the City of Salisbury

| 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. 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: <https://egis.hud.gov/affht>

## 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 |          |
|-------------------------|------------------|----------|---------------|----------|
|                         | #                | %        | #             | %        |
| <b>Total population</b> | <b>30,343</b>    | <b>-</b> | <b>32,368</b> | <b>-</b> |
| 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%    |

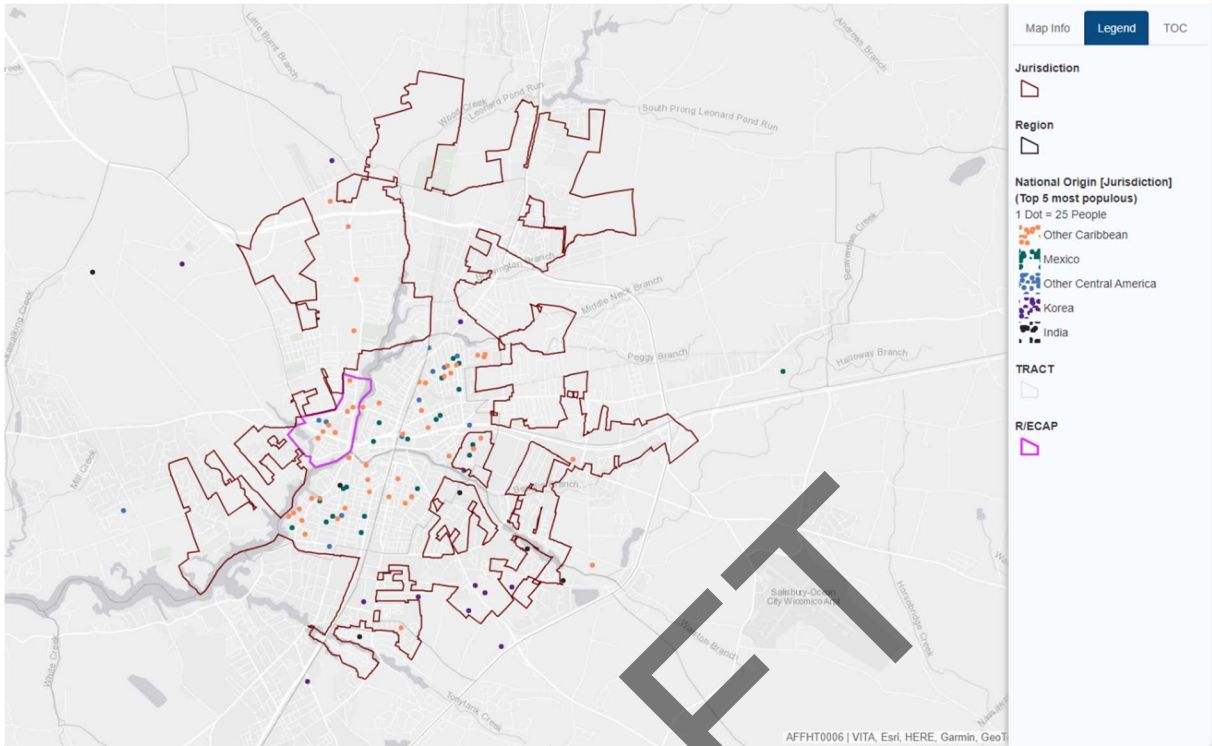
|                           |       |        |       |        |
|---------------------------|-------|--------|-------|--------|
| French Canadian           | 98    | 0.33%  | 35    | 0.11%  |
| German                    | 4,156 | 14.16% | 3,572 | 11.04% |
| Greek                     | 168   | 0.57%  | 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

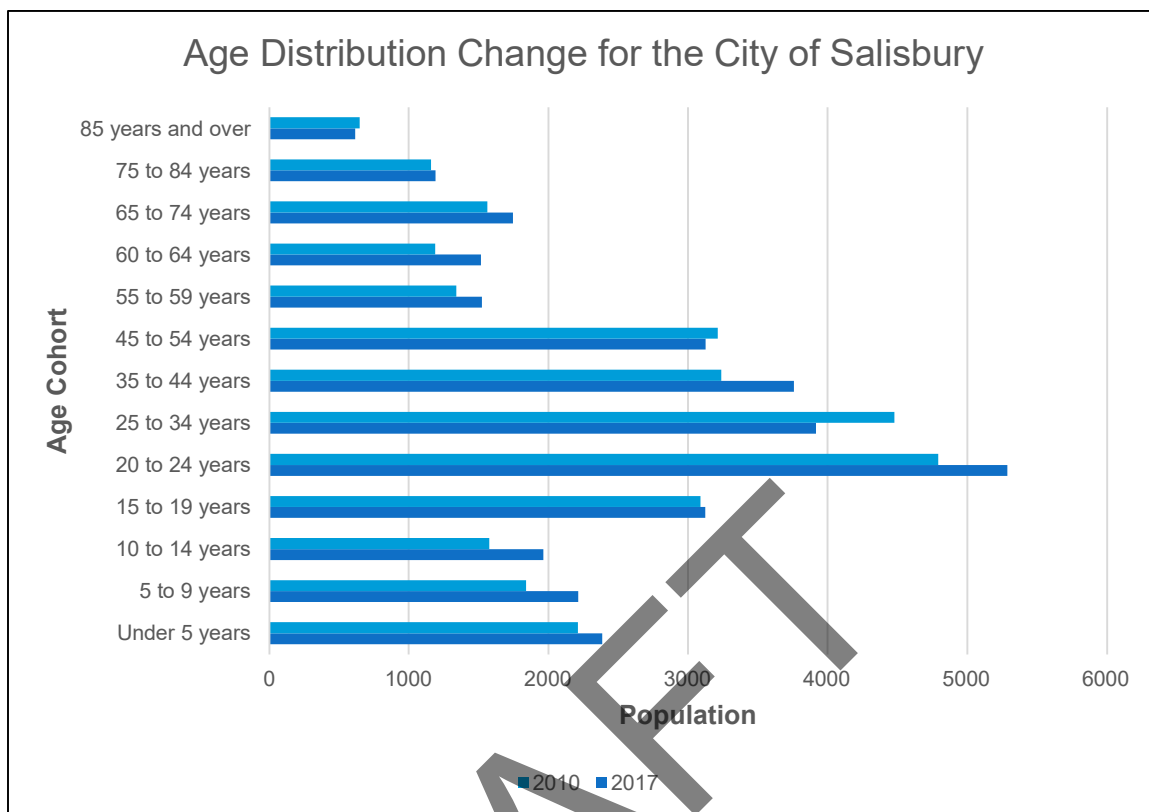
The most common ancestries identified in the City of Salisbury were Other Groups, English, German, and Irish. Between 2010 and 2017, the City of Salisbury noted slight fluctuations in ancestry breakdowns. It is of note the increase in the Haitian and Sub-Saharan populations in the City. The following national origin dot density map based on the 2010 U.S. Census shows the concentration and location of various origin cohorts in the City.



Source: <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.



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 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%         |
| <b>Total Adherents:</b>           | <b>26,365</b> | <b>40.9%</b> | <b>34,122</b> | <b>45.9%</b> | <b>40,580</b> | <b>47.9%</b> | <b>37,363</b> | <b>37.8%</b> |
| Unclaimed (% of total population) | 38,175        | 59.2%        | 40,217        | 54.1%        | 44,064        | 52.1%        | 61,370        | 62.2%        |
| <b>Total Population:</b>          | <b>64,540</b> | <b>100%</b>  | <b>74,339</b> | <b>100%</b>  | <b>84,644</b> | <b>100%</b>  | <b>98,733</b> | <b>100%</b>  |

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

The following table highlights the changes in the number of households and population in the area over the past seventeen (17) years.

| Year | HOUSEHOLDS |        | POPULATION |        |
|------|------------|--------|------------|--------|
|      | #          | Change | #          | Change |
| 2000 | 9,233      | -      | 24,159     | -      |
| 2010 | 11,019     | 16.2%  | 29,343     | 17.7%  |
| 2017 | 12,246     | 10.0%  | 32,368     | 9.3%   |

Source: 2000 U.S. Census, 2010 U.S. Census, and 2013-2017 ACS

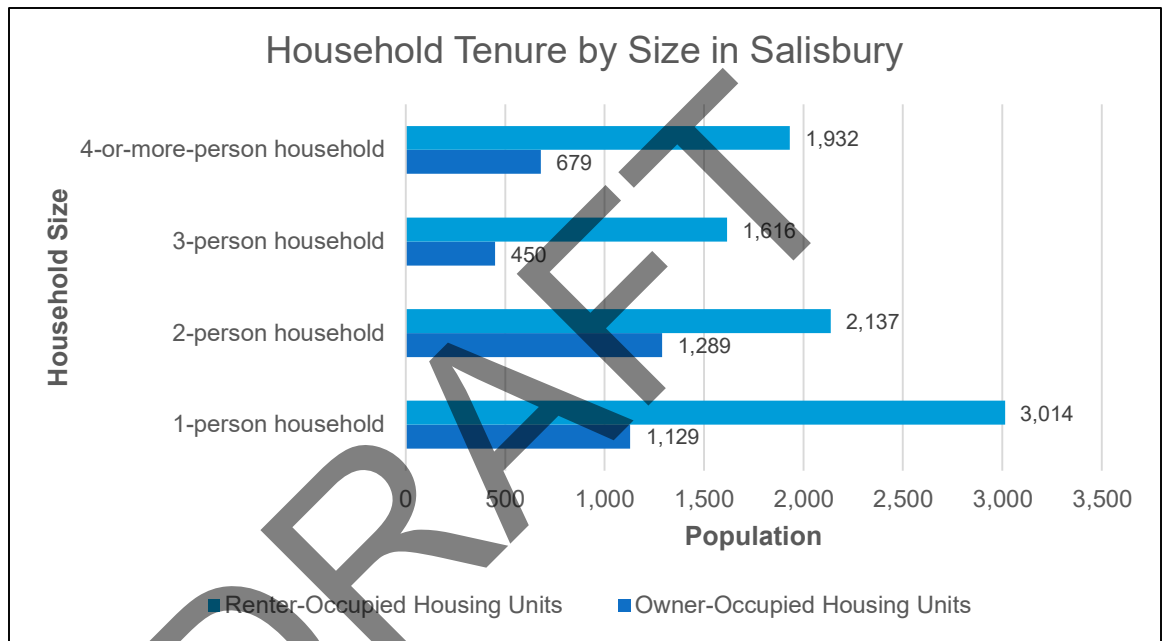
## Household Tenure

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 1:3. Based on this housing unit type disparity, special consideration should be made by the City concerning housing related policy and development decisions. For the housing vacancy data, the U.S. Census uses the following definitions:

- For Rent: Housing units that are intended for occupancy by renters but are currently being marketed for occupancy.
- Rented, Not Occupied: Housing units that are currently rented or leased but are not currently occupied by the renter. This could occur, for example, when a tenant has signed a lease but has not yet moved in or has temporarily vacated the unit.
- For Sale Only: Housing units that are currently available for sale but are not occupied by the owner or a renter. These units are exclusively on the market for sale.
- Sold, Not Occupied: Housing units that have been sold but are not currently occupied by the new owner or a renter. This could occur, for example, when a property is sold but the new owner has not yet moved in.
- For Seasonal, Recreational, or Occasional Use: Housing units that are intended for temporary, seasonal, recreational, or occasional use rather than year-round occupancy. These units may include vacation homes, cabins, or other similar properties.
- For Migrant Workers: Housing units that are specifically intended for occupancy by migrant workers, typically for temporary or seasonal agricultural work.

- Other Vacant: Housing units that are vacant for reasons other than those mentioned above. This category may include units that are undergoing renovation or construction, units that are awaiting demolition, or units that are vacant for other unspecified reasons.

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.

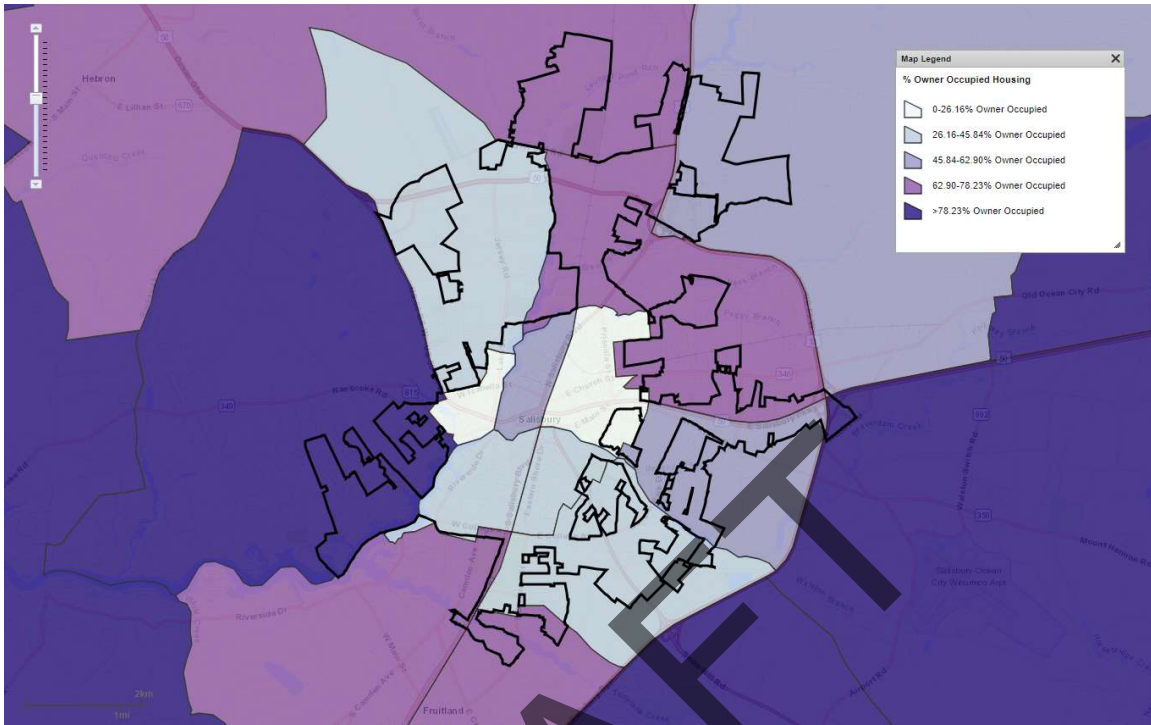


Source: 2013-2017 ACS

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.

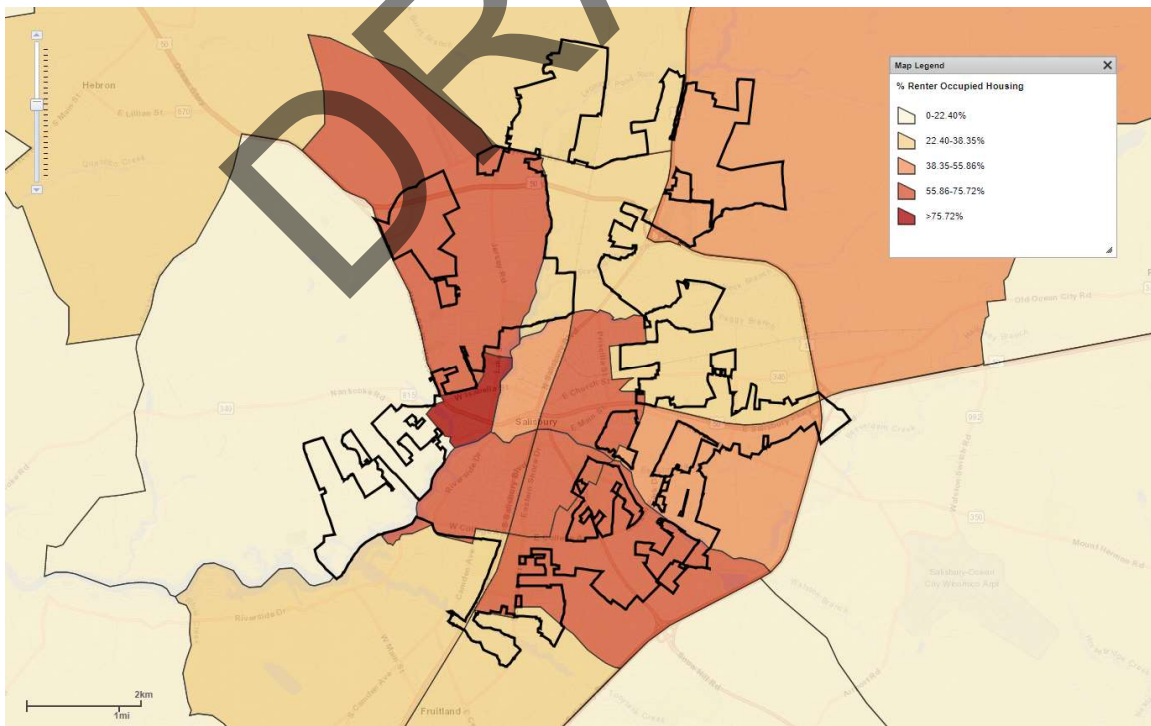
The following maps illustrate that owner-occupied units are scattered across the City, with the highest concentrations being located in the outskirts of the City. The highest concentrations of renter-occupied units are more centrally located in the City. Higher concentrations of a particular housing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

## Percentage Owner-Occupied Housing



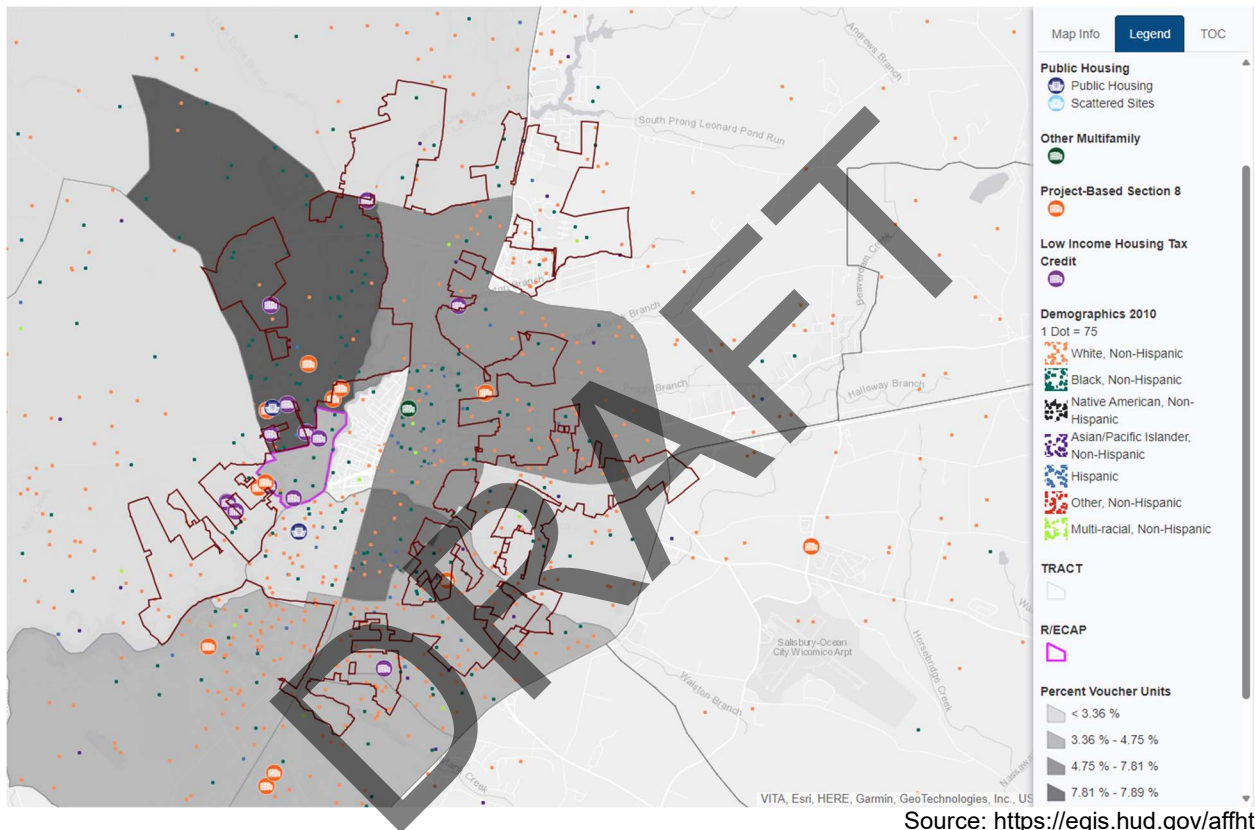
Source: HUD CPD Maps

## 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.



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

### Household Tenure by Race and Ethnicity

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

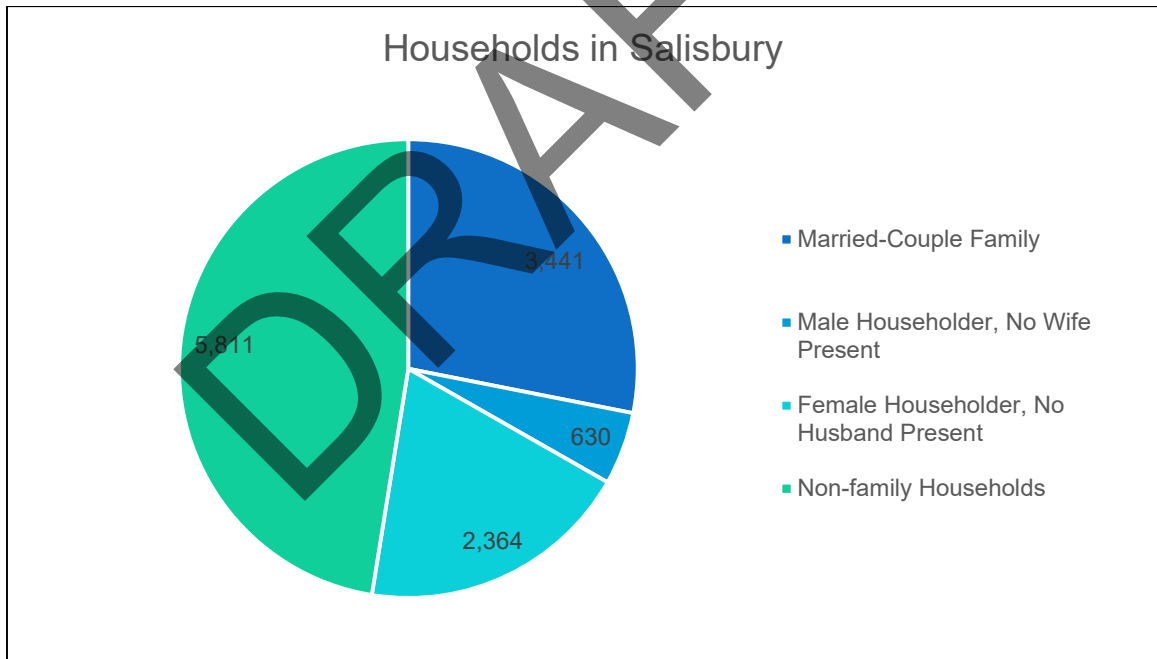
Homeownership rates continue to decline in the City. Homeowners represented 37.8% (3,427 households) of all households in 2000, 33.2% (3,981 households) of all households in 2010, and 28.9% (3,547 households) of all households in 2017. In response, rental rates increased in the City. Renters represented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

### Household Income

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%      |
| <b>Median Household Income</b> | \$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 2023 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 \$93,200 for 2023.

### FY 2023 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 | \$17,900 | \$20,450 | \$24,860 | \$30,000 | \$35,140 | \$40,280 | \$45,420 | \$50,560 |
| Very Low (50%) Income Limits      | \$29,850 | \$34,100 | \$38,350 | \$42,600 | \$46,050 | \$49,450 | \$52,850 | \$56,560 |
| Low (80%) Income Limits           | \$47,750 | \$54,550 | \$61,350 | \$68,150 | \$73,650 | \$79,100 | \$84,550 | \$90,000 |

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

On February 14, 2019, HUD CPD-19-02 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 2023 for the City of Salisbury

| PLACE            | CT            | BG       | LMI          | TOT POP      | PRCT          |
|------------------|---------------|----------|--------------|--------------|---------------|
| Salisbury        | 000100        | 1        | 405          | 855          | 47.37%        |
| <b>Salisbury</b> | <b>000100</b> | <b>2</b> | <b>2,335</b> | <b>2,910</b> | <b>80.24%</b> |
| <b>Salisbury</b> | <b>000100</b> | <b>3</b> | <b>470</b>   | <b>720</b>   | <b>65.28%</b> |
| <b>Salisbury</b> | <b>000100</b> | <b>4</b> | <b>320</b>   | <b>570</b>   | <b>56.14%</b> |
| <b>Salisbury</b> | <b>000100</b> | <b>5</b> | <b>800</b>   | <b>1,020</b> | <b>78.43%</b> |
| Salisbury        | 000200        | 1        | 570          | 1,185        | 48.10%        |
| <b>Salisbury</b> | <b>000200</b> | <b>2</b> | <b>375</b>   | <b>650</b>   | <b>57.69%</b> |
| <b>Salisbury</b> | <b>000300</b> | <b>1</b> | <b>440</b>   | <b>660</b>   | <b>66.67%</b> |
| <b>Salisbury</b> | <b>000300</b> | <b>2</b> | <b>665</b>   | <b>765</b>   | <b>86.93%</b> |
| <b>Salisbury</b> | <b>000400</b> | <b>1</b> | <b>720</b>   | <b>1,300</b> | <b>55.38%</b> |
| <b>Salisbury</b> | <b>000400</b> | <b>2</b> | <b>335</b>   | <b>600</b>   | <b>55.83%</b> |
| Salisbury        | 000400        | 3        | 420          | 1,370        | 30.66%        |

|                  |               |          |              |              |               |
|------------------|---------------|----------|--------------|--------------|---------------|
| Salisbury        | 000400        | 4        | 355          | 840          | 42.26%        |
| Salisbury        | 000500        | 1        | 560          | 1,145        | 48.91%        |
| <b>Salisbury</b> | <b>000500</b> | <b>2</b> | <b>825</b>   | <b>1,175</b> | <b>70.21%</b> |
| <b>Salisbury</b> | <b>000500</b> | <b>3</b> | <b>550</b>   | <b>680</b>   | <b>80.88%</b> |
| <b>Salisbury</b> | <b>010101</b> | <b>1</b> | <b>545</b>   | <b>1,055</b> | <b>51.66%</b> |
| <b>Salisbury</b> | <b>010101</b> | <b>2</b> | <b>785</b>   | <b>1,395</b> | <b>56.27%</b> |
| Salisbury        | 010101        | 3        | 130          | 1,690        | 7.69%         |
| <b>Salisbury</b> | <b>010101</b> | <b>4</b> | <b>570</b>   | <b>880</b>   | <b>64.77%</b> |
| 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%        |
| <b>Salisbury</b> | <b>010200</b> | <b>2</b> | <b>615</b>   | <b>1,130</b> | <b>54.42%</b> |
| <b>Salisbury</b> | <b>010200</b> | <b>3</b> | <b>920</b>   | <b>1,080</b> | <b>85.19%</b> |
| <b>Salisbury</b> | <b>010200</b> | <b>4</b> | <b>725</b>   | <b>890</b>   | <b>81.46%</b> |
| <b>Salisbury</b> | <b>010200</b> | <b>5</b> | <b>865</b>   | <b>970</b>   | <b>89.18%</b> |
| Salisbury        | 010300        | 1        | 615          | 3,205        | 19.19%        |
| <b>Salisbury</b> | <b>010300</b> | <b>2</b> | <b>310</b>   | <b>370</b>   | <b>83.78%</b> |
| 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%        |
| <b>Salisbury</b> | <b>010502</b> | <b>2</b> | <b>3,125</b> | <b>3,895</b> | <b>80.23%</b> |
| <b>Salisbury</b> | <b>010502</b> | <b>3</b> | <b>940</b>   | <b>1,265</b> | <b>74.31%</b> |
| <b>Salisbury</b> | <b>010502</b> | <b>4</b> | <b>995</b>   | <b>1,280</b> | <b>77.73%</b> |
| <b>Salisbury</b> | <b>010603</b> | <b>1</b> | <b>1,260</b> | <b>2,250</b> | <b>56.00%</b> |
| 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 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.

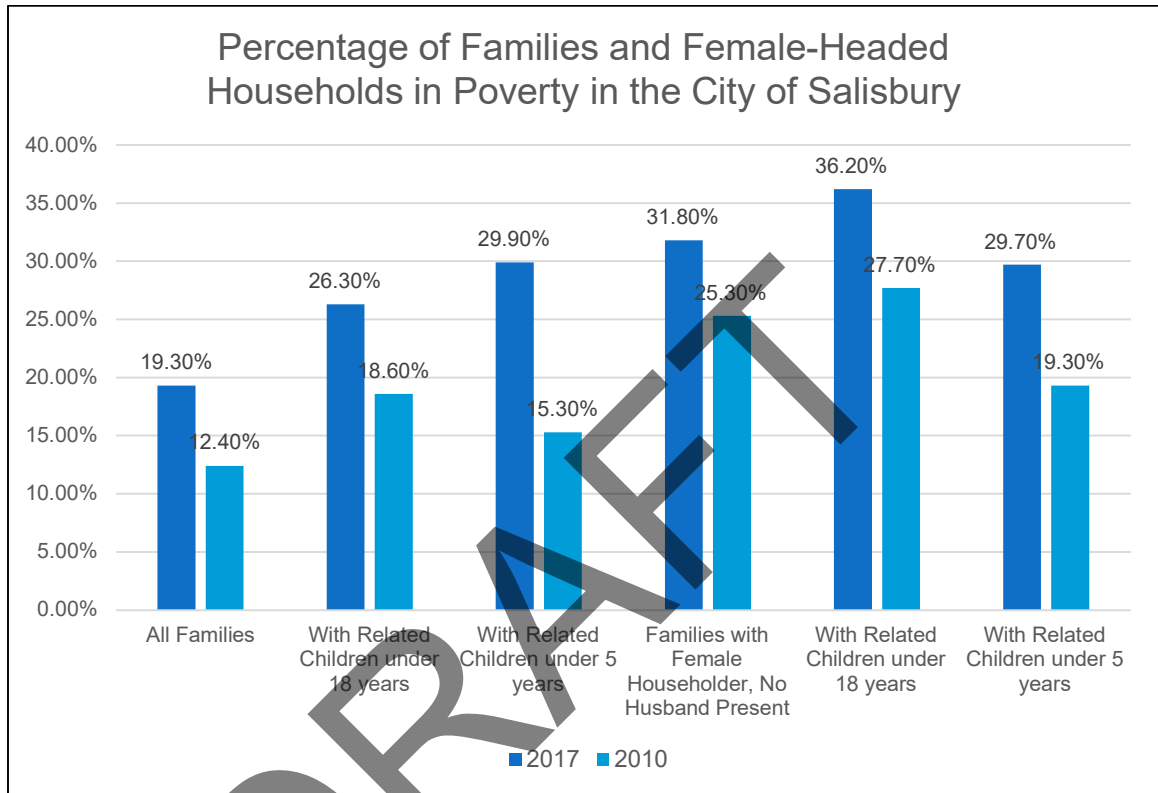
### Family and Household Poverty

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.



Source: 2006-2010 and 2013-2017 ACS

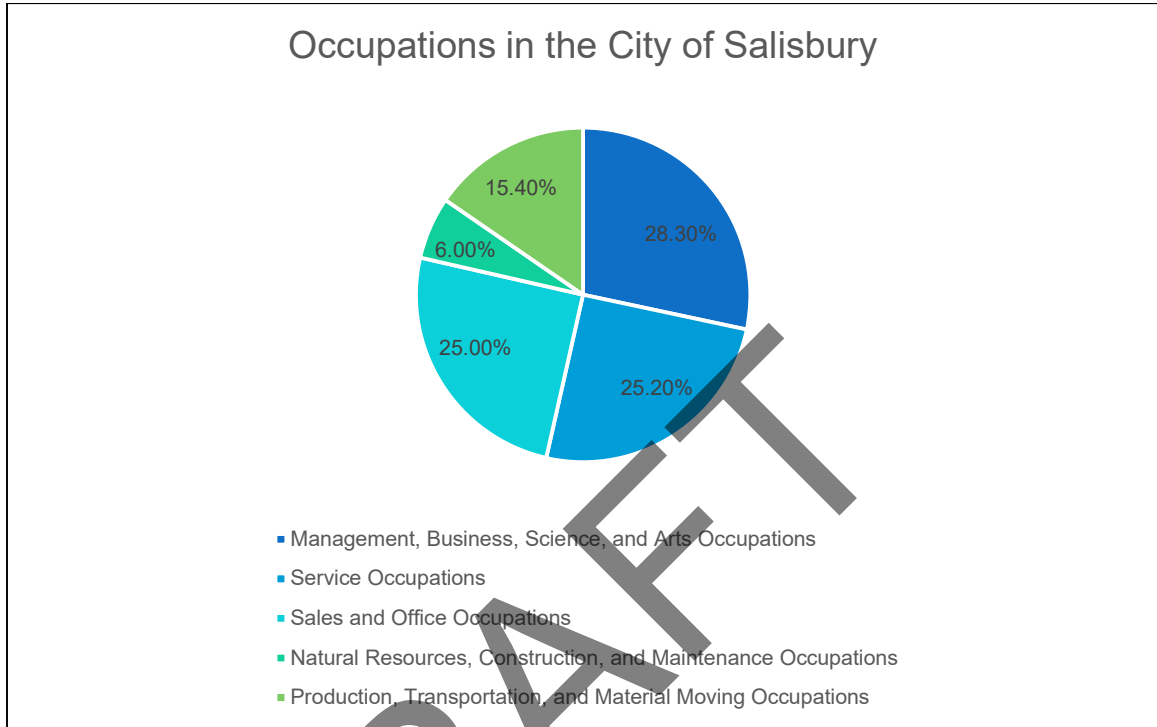
## D. Employment

### Occupation

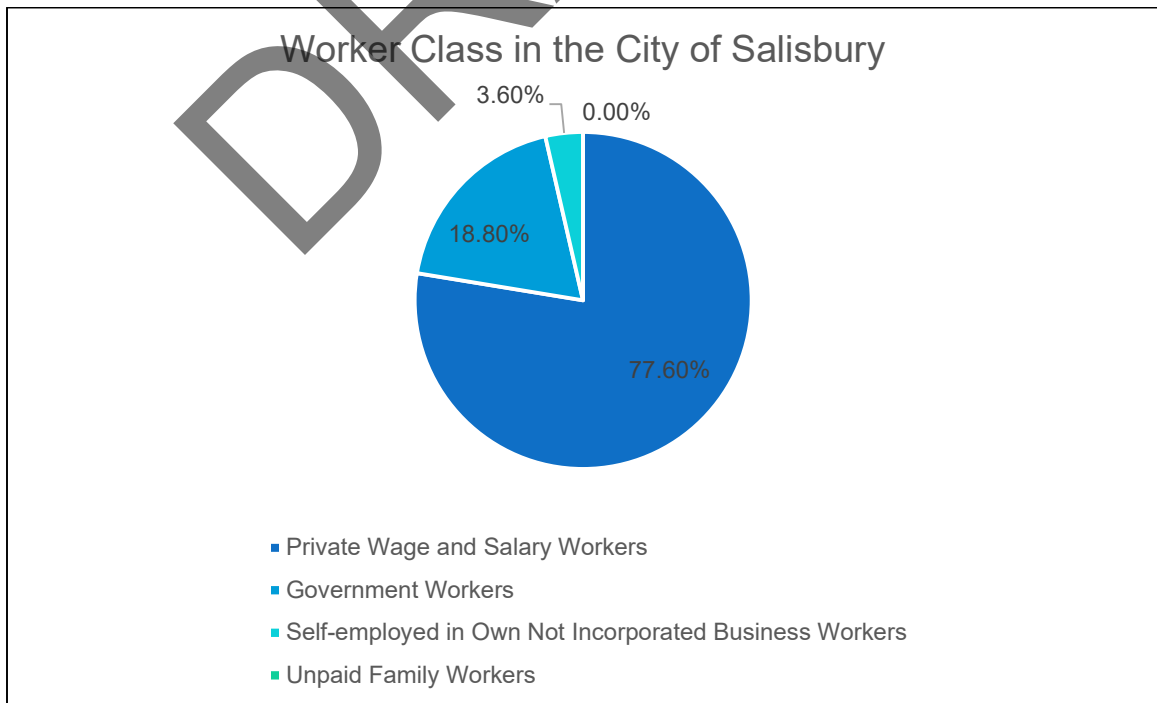
In 2010, 63.8% of the City’s residents 16 years of age and over were part of the labor force. In 2017, 65.9% of the City’s residents 16 years of age and over were part of the labor force; according to the 2006-2010 and 2013-2017 ACS. The following charts illustrate the categories of workers and their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

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.



Source: 2013-2017 ACS

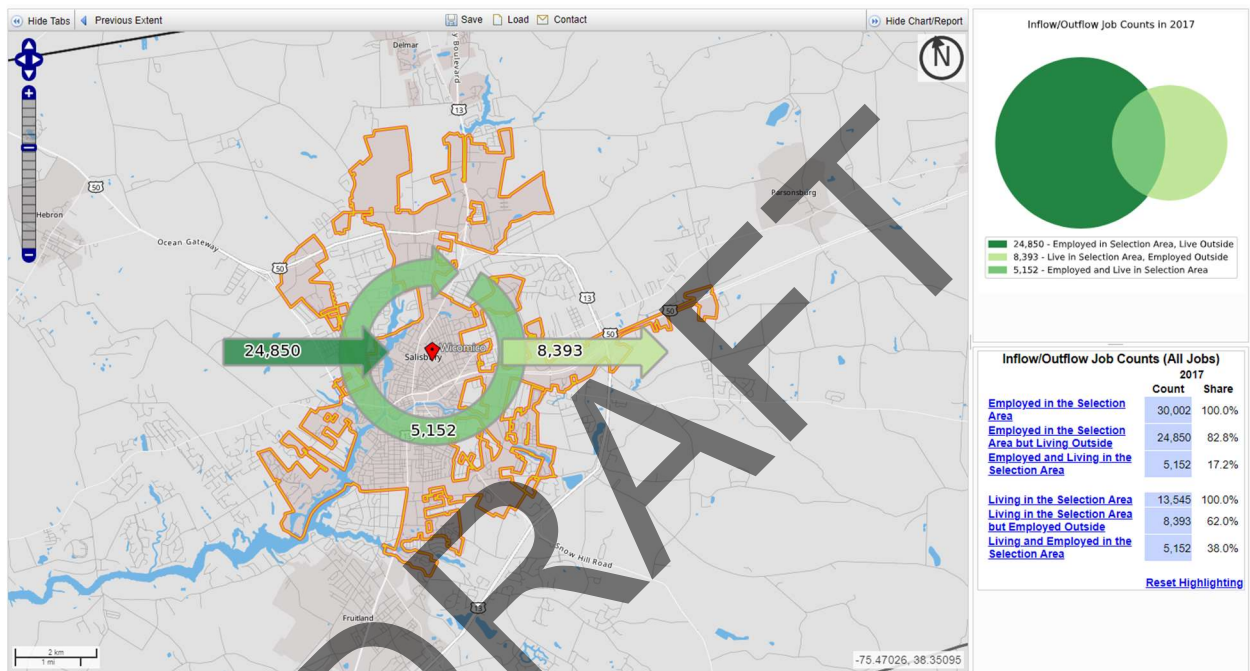


Source: 2013-2017 ACS



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

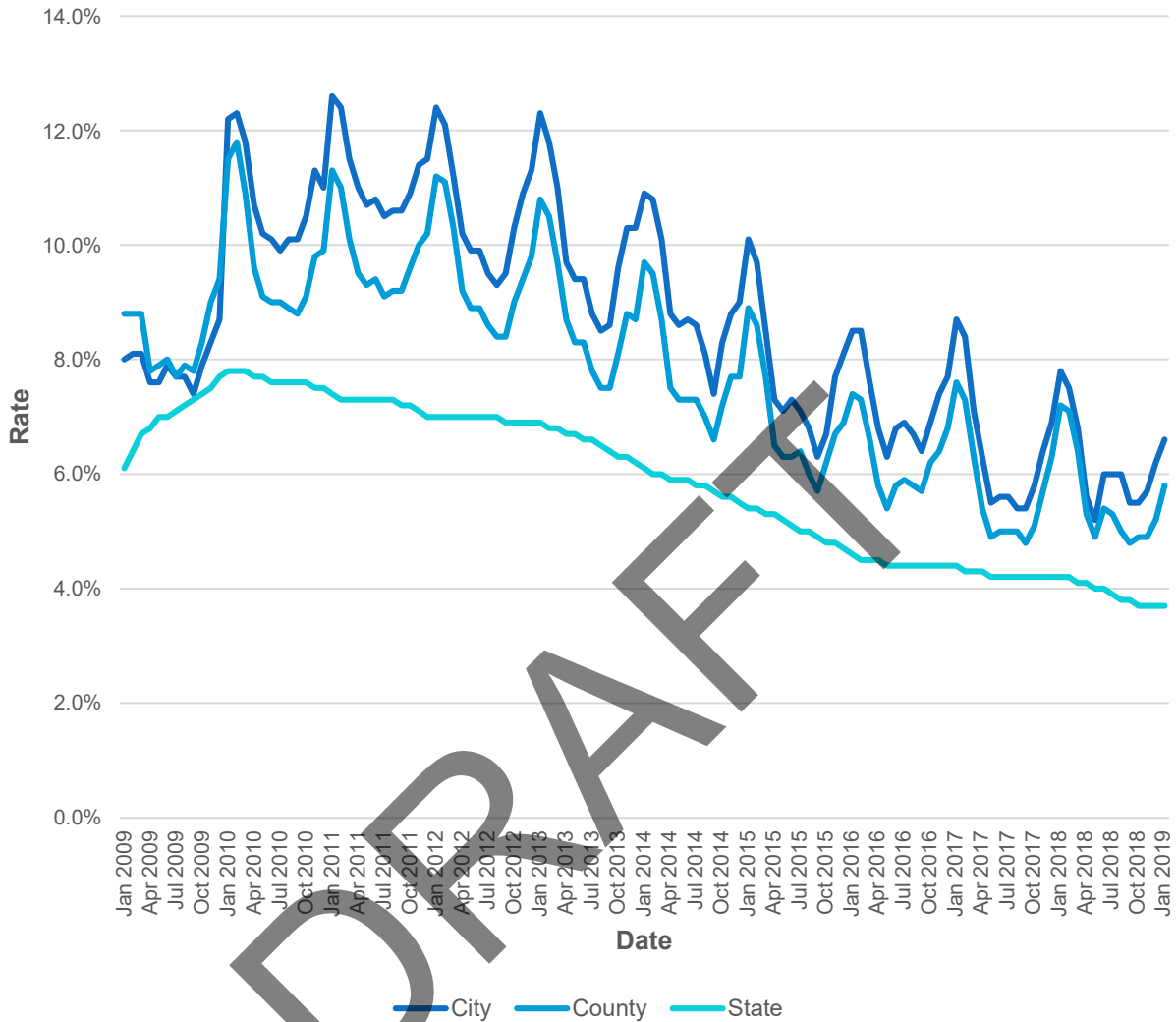
Workers in 2017 had a mean travel time to work of 20 minutes. The following labor market resident inflow/outflow data as of 2017 applied to the City. There was a total of 30,002 jobs in the City and 24,850 (82.8%) of those jobs were held by residents of the City. There were 5,152 (38.0%) residents living in Salisbury and working in Salisbury. There were 8,393 (62.0%) residents living in Salisbury and working outside of Salisbury.



## Unemployment Rate

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](http://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

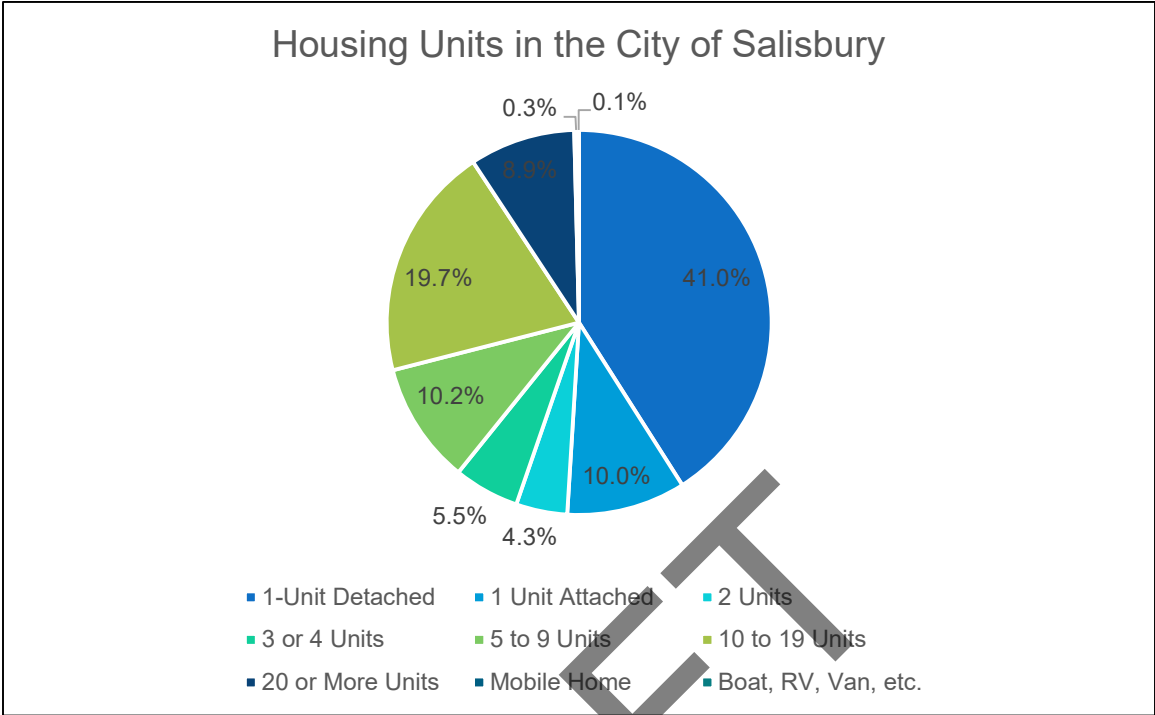
City was 1983. The following table chart details the year that housing structures were built in the City of Salisbury as of 2017.

### 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%       |
| <b>Total</b>          | <b>14,451</b> | <b>100%</b> |

Source: 2013-2017 ACS

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



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

| Year | Total | Single Family | Multi-Family | 5+ Units |
|------|-------|---------------|--------------|----------|
| 2023 | 78    | 59            | 19           | 11       |
| 2022 | 95    | 35            | 60           | 0        |
| 2021 | 27    | 0             | 0            | 0        |
| 2020 | 92    | 43            | 49           | 39       |

|             |    |    |    |    |
|-------------|----|----|----|----|
| <b>2019</b> | 72 | 32 | 40 | 40 |
| <b>2018</b> | 41 | 25 | 16 | 12 |
| <b>2017</b> | 19 | 15 | 4  | 0  |

Source: <https://socds.huduser.gov/permits>

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 as of February 2022, “there have been 1,037 transactions over the past year in Salisbury. The median value for residential home transactions that occurred over the previous year was \$233,948.44. The number of current listings in Salisbury is 129. Salisbury, MD currently has 18 properties in foreclosure, 4 bank owned properties, 5 properties headed for auction, and 129 properties for sale.”

### 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 2023 HUD Fair Market Rents and HOME Rent Limits for the Salisbury, MD HUD MSA are shown in the table below.

### FY 2023 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 | \$856      | \$861       | \$1,134     | \$1,506       | \$1,635      |
| High HOME Rent   | \$746      | \$799       | \$958       | \$1,108       | \$1,236      |
| Low HOME Rent    | \$856      | \$861       | \$1,134     | \$1,407       | \$1,550      |

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 2013-2017 ACS data. The tables disaggregate households and housing problems based on the area's median household income (HAMFI).

## Household Types

|  | 0-30%<br>HAMFI | >30-<br>50%<br>HAMFI | >50-<br>80%<br>HAMFI | >80-<br>100%<br>HAMFI | >100%<br>HAMFI |
|--|----------------|----------------------|----------------------|-----------------------|----------------|
| <b>Total Households</b>  | 2,575          | 2,410                | 2,350                | 1,185                 | 4,190          |
| <b>Small Family Households</b>                                     | 674            | 845                  | 1,095                | 540                   | 1,815          |
| <b>Large Family Households</b>                                     | 134            | 75                   | 130                  | 34                    | 140            |
| <b>Household contains at least one person 62-74 years of age</b>   | 420            | 355                  | 310                  | 168                   | 1,044          |
| <b>Household contains at least one person age 75 or older</b>      | 410            | 404                  | 335                  | 59                    | 239            |
| <b>Households with one or more children 6 years old or younger</b> | 464            | 408                  | 504                  | 249                   | 383            |

Source: 2013-2017 American Community Survey

## Housing Problems (Households with one of the listed needs)

|   | Renter       |                    |                    |                     |       | Owner            |                    |                    |                     |       |
|---|--------------|--------------------|--------------------|---------------------|-------|------------------|--------------------|--------------------|---------------------|-------|
|   | 0-30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total | 0-<br>30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total |
| Substandard Housing - Lacking complete plumbing or kitchen facilities                 | 115          | 40                 | 35                 | 15                  | 205   | 0                | 0                  | 20                 | 0                   | 20    |
| Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing) | 130          | 10                 | 4                  | 40                  | 184   | 0                | 0                  | 10                 | 0                   | 10    |
| Overcrowded - With 1.01-1.5 people per room (and none of the above problems)          | 55           | 20                 | 25                 | 30                  | 130   | 0                | 0                  | 0                  | 0                   | 0     |
| Housing cost burden greater than 50% of income (and none of the above problems)       | 1,345        | 800                | 140                | 15                  | 2,300 | 305              | 55                 | 34                 | 4                   | 398   |

|   | 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 |
| Housing cost burden greater than 30% of income (and none of the above problems) | 194       | 920         | 654         | 170          | 1,938 | 59        | 94          | 109         | 65           | 327   |
| Zero/negative Income (and none of the above problems)                           | 50        | 0           | 0           | 0            | 50    | 80        | 0           | 0           | 0            | 80    |

Source: 2013-2017 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                             | 1,650     | 875         | 210         | 100          | 2,835 | 305       | 55          | 65          | 4            | 429   |
| Having none of four housing problems                                  | 460       | 1,280       | 1,590       | 790          | 4,120 | 164       | 215         | 485         | 285          | 1,149 |
| Household has negative income, but none of the other housing problems | 0         | 0           | 0           | 0            | 0     | 0         | 0           | 0           | 0            | 0     |

Source: 2013-2017 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        | 595       | 690         | 349         | 1,634 | 28        | 45          | 50          | 123   |
| Large Related        | 125       | 15          | 0           | 140   | 4         | 0           | 0           | 4     |
| Elderly              | 320       | 360         | 159         | 839   | 175       | 84          | 83          | 342   |
| Other                | 729       | 715         | 315         | 1,759 | 155       | 20          | 14          | 189   |
| Total need by income | 1,769     | 1,780       | 823         | 4,372 | 362       | 149         | 147         | 658   |

Source: 2013-2017 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        | 0         | 0           | 285         | 285   | 24        | 25          | 0           | 49    |
| Large Related        | 0         | 0           | 0           | 0     | 4         | 0           | 0           | 4     |
| Elderly              | 170       | 35          | 50          | 255   | 120       | 10          | 30          | 160   |
| Other                | 0         | 700         | 475         | 1,175 | 155       | 0           | 0           | 155   |
| Total need by income | 170       | 735         | 810         | 1,715 | 303       | 35          | 30          | 368   |

Source: 2013-2017 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              | 135       | 30          | 29          | 70           | 264   | 0         | 0           | 10          | 0            | 10    |
| Multiple, unrelated family households | 0         | 0           | 0           | 0            | 0     | 0         | 0           | 0           | 0            | 0     |
| Other, non-family households          | 50        | 0           | 0           | 0            | 50    | 0         | 0           | 0           | 0            | 0     |
| Total need by income                  | 185       | 30          | 29          | 70           | 314   | 0         | 0           | 10          | 0            | 10    |

Source: 2013-2017 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 likely to be affected by these housing problems.

## H. Racial and Ethnic Housing Problems

Housing problems disaggregated by income, racial and ethnic cohorts were analyzed to determine if a cohort disproportionately experienced a housing problem as compared to the other cohorts. Disproportionality was identified when a racial or ethnic cohort 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%.

### 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        | 1,689                                    | 85                                    | 110  |
| White                          | 794                                      | 15                                    | 70   |
| Black / African American       | 825                                      | 75                                    | 30   |
| Asian                          | 24                                       | 0                                     | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 35                                       | 0                                     | 10   |

Source: 2013-2017 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        | 2,045                                    | 365                                   | 0  |
| White                          | 1,085                                    | 175                                   | 0  |
| Black / African American       | 820                                      | 135                                   | 0  |
| Asian                          | 20                                       | 10                                    | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 44                                       | 45                                    | 0  |

Source: 2013-2017 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        | 1,765                                    | 750                                   | 0  |
| White                          | 875                                      | 270                                   | 0  |
| Black / African American       | 765                                      | 330                                   | 0  |
| Asian                          | 55                                       | 0                                     | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 25                                    | 0  |
| Hispanic                       | 60                                       | 115                                   | 0  |

Source: 2013-2017 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        | 525                                      | 660                                   | 0  |
| White                          | 195                                      | 375                                   | 0  |
| Black / African American       | 290                                      | 230                                   | 0  |
| Asian                          | 0  | 4                                     | 0  |
| American Indian, Alaska Native | 0  | 45                                    | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 39                                       | 4                                     | 0  |

Source: 2013-2017 American Community Survey

There was one (1) disproportionately impacted cohort for housing problems; the 80%-100% of Area Median Income Black/African American cohort experienced 55% of the housing problems but represented 44% of the cohort.

Severe housing problems disaggregated by income, racial and ethnic groups were analyzed to determine if a cohort disproportionately experienced a severe housing problem as compared to the other cohorts. Disproportionality was identified when a racial or ethnic cohort experienced a 10 percentage points or higher occurrence rate of severe housing problems. 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%.

### 0%-30% of Area Median Income

| Severe 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        | 1,554                                    | 219                                   | 110  |
| White                          | 759                                      | 50                                    | 70   |
| Black / African American       | 725                                      | 169                                   | 30   |
| Asian                          | 24                                       | 0                                     | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 35                                       | 0                                     | 10   |

Source: 2013-2017 American Community Survey

### 30%-50% of Area Median Income

| Severe 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        | 1,395                                    | 1,004                                 | 0  |
| White                          | 830                                      | 414                                   | 0  |
| Black / African American       | 480                                      | 489                                   | 0  |
| Asian                          | 0  | 30                                    | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 40                                       | 49                                    | 0  |

Source: 2013-2017 American Community Survey

### 50%-80% of Area Median Income

| Severe 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        | 615                                      | 1,895                                 | 0  |
| White                          | 270                                      | 885                                   | 0  |
| Black / African American       | 285                                      | 810                                   | 0  |
| Asian                          | 35                                       | 20                                    | 0  |
| American Indian, Alaska Native | 0  | 0                                     | 0  |
| Pacific Islander               | 0  | 25                                    | 0  |
| Hispanic                       | 20                                       | 155                                   | 0  |

Source: 2013-2017 American Community Survey

### 80%-100% of Area Median Income

| Severe 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        | 185                                      | 985                                   | 0  |
| White                          | 80                                       | 480                                   | 0  |
| Black / African American       | 80                                       | 430                                   | 0  |
| Asian                          | 0  | 4                                     | 0  |
| American Indian, Alaska Native | 0  | 45                                    | 0  |
| Pacific Islander               | 0  | 0                                     | 0  |
| Hispanic                       | 29                                       | 14                                    | 0  |

Source: 2013-2017 American Community Survey

There was one (1) disproportionately impacted cohort for severe housing problems; the 80%-100% of Area Median Income Hispanic cohort experienced 16% of the housing problems but represented 4% of the cohort.

## I. Racial and Ethnic Housing Cost Burden

Housing cost burdens disaggregated by income, racial and ethnic groups were analyzed to determine if a cohort disproportionately experienced a housing cost burden as compared to the other cohorts. Disproportionality was identified when a racial or ethnic cohort experienced a 10 percentage points or higher occurrence rate of housing cost burdens. A housing cost burden is defined as a household paying over 30% of household AMI on housing costs and a severe housing cost burden is defined as a household paying over 50% of household



AMI on housing costs.

### Housing Cost Burden

| Housing Cost Burden            | <=30% | 30-50% | >50%  | No / negative income (not computed) |
|--------------------------------|-------|--------|-------|-------------------------------------|
| Jurisdiction as a whole        | 6,185 | 2,750  | 3,220 | 110                                 |
| White                          | 3,410 | 1,415  | 1,724 | 70                                  |
| Black / African American       | 1,960 | 1,135  | 1,350 | 30                                  |
| Asian                          | 240   | 40     | 28    | 0                                   |
| American Indian, Alaska Native | 45    | 0      | 0     | 0                                   |
| Pacific Islander               | 50    | 0      | 0     | 0                                   |
| Hispanic                       | 380   | 120    | 45    | 10                                  |

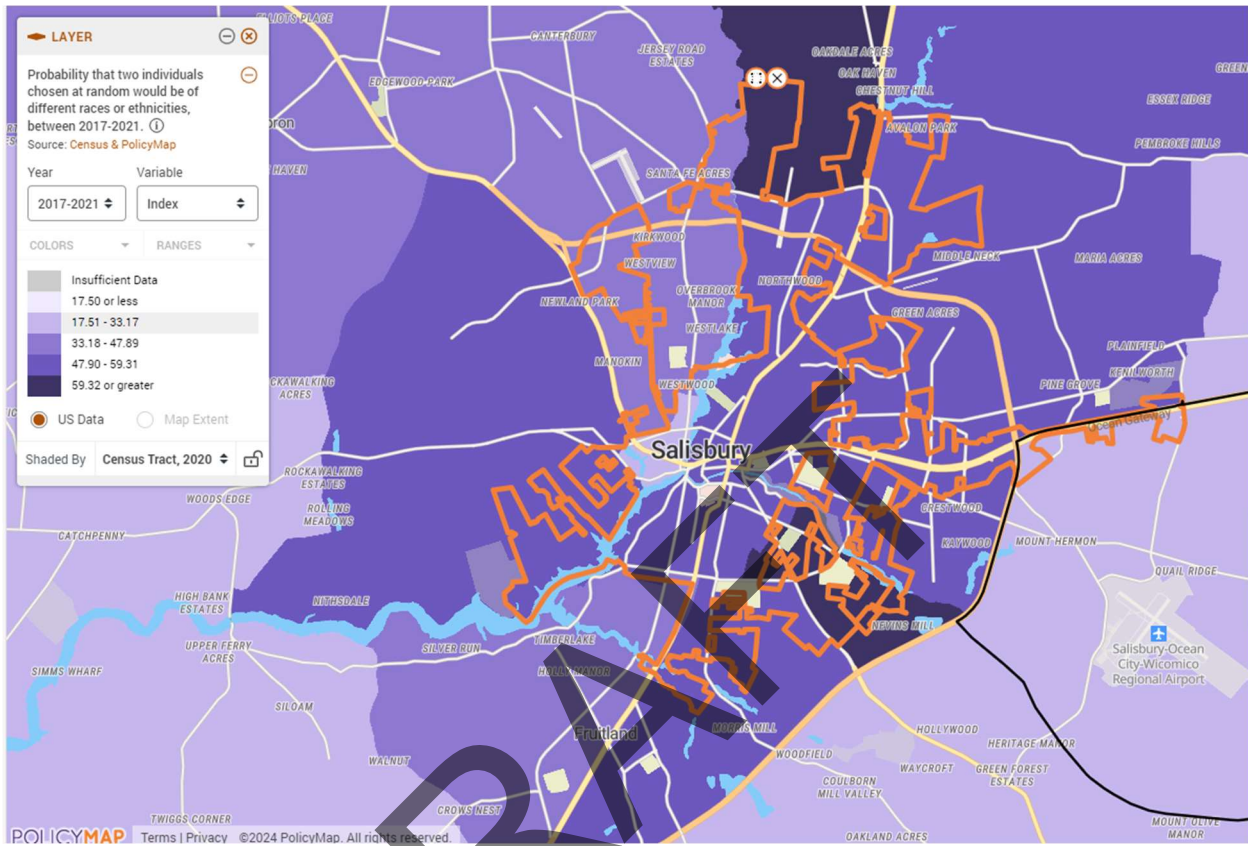
Source: 2013-2017 American Community Survey

There were no cohorts that were disproportionately affected by housing cost burdens or severe housing cost burdens.

## J. Segregation

The following map calculates the diversity index per Census Tract in the City of Salisbury. “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2013-2017. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers. Data were obtained from the Census’ American Community Survey 2013-2017 estimates and calculated by PolicyMap.” (Source: PolicyMap.com)

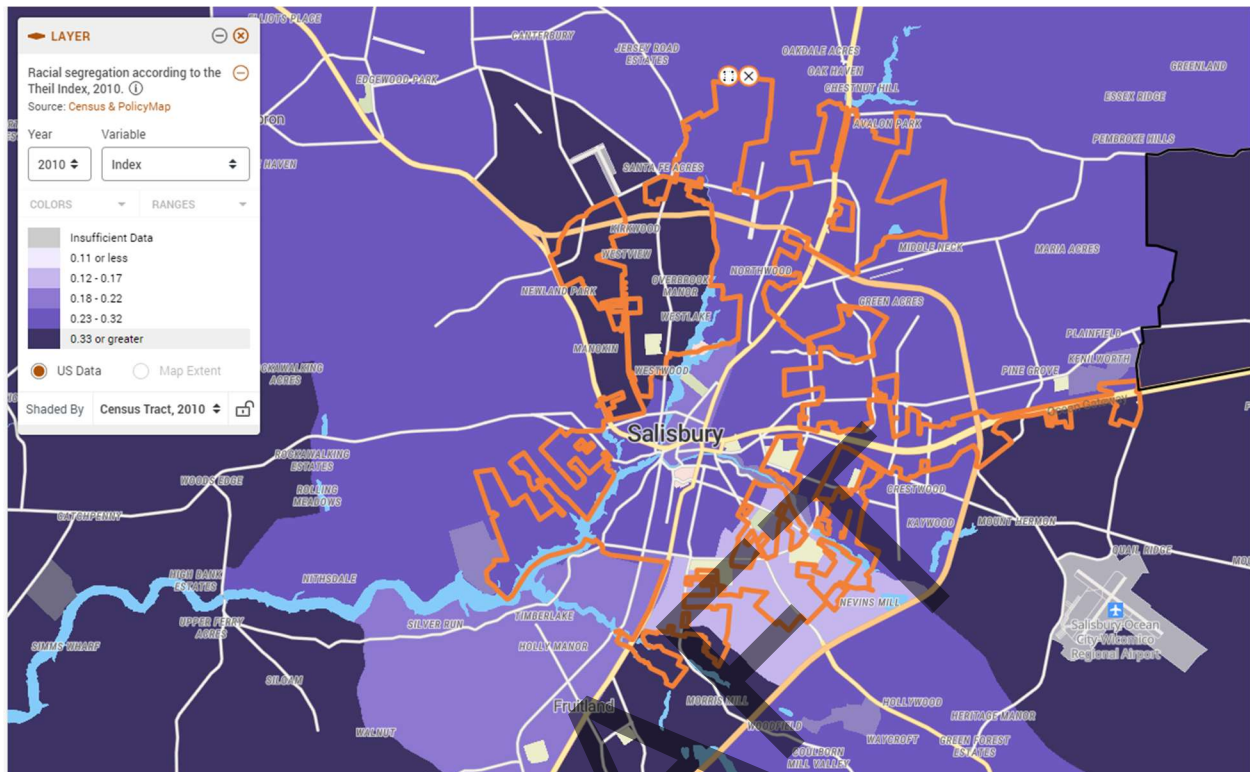
## Diversity Index



Source: [www.policymap.com/maps](http://www.policymap.com/maps)

The following map provides the Theil Index calculations per Census Tract in the City of Salisbury. "The Theil Index is an index ranging from 0 to 1 that displays information about racial segregation. Lower index values below .20 suggest less segregation and higher index values above .40 suggest more segregation. The Theil Index is a measure of how evenly members of racial and ethnic groups are distributed within a region, calculated by comparing the diversity of all sub-regions (Census Blocks) to the region as a whole. Patterns of racial segregation can emerge as a result of systemic barriers and opportunities or localized individual preferences. For example, highly segregated areas may be indicative of discriminatory housing practices or other related barriers. Data used in the calculation of this index were derived from the U.S. Census Bureau's 2010 Decennial Census." (Source: PolicyMap.com)

## Theil Index



Source: [www.policymap.com/maps](http://www.policymap.com/maps)

HUD defines a racially/ethnically concentrated area of poverty (R/ECAP) as a census tract where the number of families in poverty is equal to or greater than 40% percent of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate, and a non-white population, measured at greater than 50 percent of the population. The following CTs are identified by HUD as R/ECAP:

- CT 000300 Salisbury

## K. Persons with Disabilities

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.

### Persons with Disabilities 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%                     |
|  |                  |                              |                           |
| <b>SEX</b>   |                  |                              |                           |
| Male   | 15,008           | 1,549                        | 10.3%                     |
| Female   | 17,155           | 1,696                        | 9.9%                      |
|  |                  |                              |                           |
| <b>HISPANIC/LATINO ORIGIN</b>                                  |                  |                              |                           |
| 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 2019. 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 2019-2023 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 and Accomplishments

##### 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.

## **ACCOMPLISHMENTS FOR 2019-2023:**

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 8/23/21 The City published its City Welcome Guide in the identified primary languages of English, Spanish, and Creole. The guide includes information as to what constitutes housing discrimination and the recourses for citizens who have been discriminated against, provides information on tenants' rights, and lists partner agencies who provide City residents with housing assistance. The Welcome Guide is additionally available on the City's website.

The City of Salisbury's Code Enforcement Department partnered with Mid Shore pro bono to offer fair housing seminars to local landlords, property managers, and residents.

Maintain links on the Salisbury Housing & Community Department website to people-law.org for residents with legal issues regarding housing and links to HUD for fair housing discrimination complaints.

### **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.

**ACCOMPLISHMENTS FOR 2019-2023:**

1. In September 2020 Salisbury was ranked by LendEDU as the number one fastest growing city in Maryland that is affordable for homebuyers.
2. The Affordable Housing Resources database maintained on the City of Salisbury website was most recently updated in December 2023.
3. In 2021 the City awarded funding to Salisbury Neighborhood Housing Services for down payment and settlement assistance to enable the purchase of homes affordable for prospective LMI borrowers. Housing counseling is offered as part of this service.
4. In 2021, the City sought and obtained \$50,000 in funding from the Maryland State Revitalization Program for the Salisbury Neighborhood Intervention Program. One facet of this program provided for the removal of safety hazards in homes that were in danger of becoming inhabitable.
5. In 2023, the City sought and obtained \$500,000 in Maryland State Revitalization Funding to support the development of the Salisbury Market Center. The Market Center will be a mixed - use development providing affordable housing for 40 households. 4 of the 40 unit total will be handicapped accessible.
6. The HORIZON Program was instituted in 2021 and offers tax credits to developers constructing new multi-family residential project or rehabilitating or expanding an existing multi-family residential project with an assessed value of over \$10 million dollars in the Central Business Development and Riverfront Redevelopment Zoning Districts.

**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.

#### **ACCOMPLISHMENTS FOR 2019-2023:**

1. The Affordable Housing Resources database maintained on the City of Salisbury website was most recently updated in December 2023 and offers information on accessibility.
2. Housing developments constructed over the past 5 years have included at minimum, 5% accessible units.
3. The City instituted the “Here Is Home” initiative in 2021. This initiative provided fee waivers to developers which resulted in a total of 327 multi-family dwelling units permitted and under construction; a minimum of 5% of the total to be constructed will be accessible.
4. The City authorized property tax credits to Habitat for Humanity for the acquisition and rehabilitation of homes to be re-sold to private owner.
5. In 2023, the City sought and obtained \$500,000 in Maryland State Revitalization Funding to support the development of the Salisbury Market Center. The Market Center will be a mixed - use development providing affordable housing for 40 households. 4 of the 40 unit total will be handicapped accessible.

#### **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.

**ACCOMPLISHMENTS FOR 2019-2023:**

Salisbury completed a draft Zoning and Form Based Codes plan in 2022 which includes the goal of promoting housing diversity in the interest of offering opportunities for seniors, students, middle-income, and affordable housing.

The City is in the process of updating the 2010 Consolidated Plan and projects to complete the revised Comprehensive Plan by the end of 2024. The Comprehensive Plan will encompass Zoning, Land Use, and Housing.

In 2021 the City adopted a Nonconforming Use Zoning Exception Program which allowed for vacant properties to be rehabilitated to provide additional rental housing stock. Rental units must be rehabilitated and available for occupancy within 12 months of entrance into the program. To date, 9 applications have been submitted and approved, 1 unit complete.

## IV. Impediments to Fair Housing 2024

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 area was undertaken.

The following section will identify impediments to fair housing choice in the City of Salisbury.

### A. Fair Housing Complaints

#### 1. 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.

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 2023 Annual Summary Report published by the MCCR reported 14 cases in Wicomico County. The cases were 12 employment cases, 1 public accommodation case, and 1 hate crime case. There were no housing cases reported from 2020 to 2023 and 2 housing cases reported in 2019.

## **2. 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 carry out 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).

## **3. 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 the following complaints were filed from January 1, 2009 until December 31, 2023:

### HUD REPORTED FAIR HOUSING COMPLAINTS 2019 - 2023

| January 1, 2019 – December 31, 2023 |                            |             |              |   |                               |  |
|-------------------------------------|----------------------------|-------------|--------------|---|-------------------------------|--|
| Violation City                      | Violation State and County | Filing Date | Closure Date | Closure Reason                                      | Basis                         | Issues   |
| Salisbury                           | Maryland - Wicomico        | 08/08/18    | 04/24/19     | Complaint withdrawn by complainant after resolution | Race                          | Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)   |
| Salisbury                           | Maryland – Wicomico        | 03/25/19    | 06/17/19     | No cause determination                              | Disability                    | Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation                       |
| Salisbury                           | Maryland – Wicomico        | 04/29/20    | 11/25/20     | No cause determination                              | Race, Disability              | Discriminatory refusal to rent   |
| Salisbury                           | Maryland – Wicomico        | 02/25/22    | TBD          | -   | Race, Disability, Retaliation | -  |
| Salisbury                           | Maryland – Wicomico        | 06/22/22    | 06/01/23     | No cause determination                              | Disability                    | Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation     |
| Salisbury                           | Maryland – Wicomico        | 04/21/23    | TBD          | -   | Disability                    | Otherwise deny or make housing unavailable   |
| Salisbury                           | Maryland – Wicomico        | 05/01/23    | 11/14/23     | No cause determination                              | Disability, Retaliation       | Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation |
| Salisbury                           | Maryland - Wicomico        | 04/26/23    | 08/02/23     | Conciliation/settlement successful                  | Race, Disability              | Discriminatory refusal to rent   |

The majority of fair housing complaints over the past five years were for disability and race. This is consistent with the previous ten years' of cases reported in Salisbury. The majority of reported issues specific to disability were the "failure to make reasonable accommodations." The majority of reported issues specific to race were "discrimination in terms/conditions/privileges relating to rental."

#### **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 (most recent year available) organized by basis of complaint. 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.

### HUD and FHAP Housing Complaints Nationwide

| Basis                             | FY 2019              |            | FY 2020              |            | FY 2021              |            | FY 2022              |            |
|-----------------------------------|----------------------|------------|----------------------|------------|----------------------|------------|----------------------|------------|
|                                   | Number of Complaints | % of Total | Number of Complaints | % of Total | Number of Complaints | % of Total | Number of Complaints | % of Total |
| Disability                        | 4,767                | 45%        | 4,612                | 45%        | 4,791                | 42%        | 5,069                | 43%        |
| Race                              | 2,002                | 19%        | 1,996                | 19%        | 2,480                | 22%        | 2,457                | 21%        |
| Sex                               | 853                  | 8%         | 854                  | 8%         | 1,072                | 9%         | 1,107                | 9%         |
| Retaliation                       | 979                  | 9%         | 921                  | 9%         | 1,022                | 9%         | 1,065                | 9%         |
| National Origin                   | 743                  | 7%         | 767                  | 7%         | 835                  | 7%         | 765                  | 7%         |
| Familial Status                   | 756                  | 7%         | 674                  | 7%         | 778                  | 7%         | 741                  | 6%         |
| Color                             | 313                  | 3%         | 256                  | 3%         | 359                  | 3%         | 354                  | 3%         |
| Religion                          | 202                  | 2%         | 157                  | 2%         | 185                  | 2%         | 183                  | 2%         |
| <b>Number of Complaints filed</b> | <b>10,615</b>        |            | <b>10,237</b>        |            | <b>11,522</b>        |            | <b>11,741</b>        |            |

Source: [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/annualreport](https://www.hud.gov/program_offices/fair_housing_equal_opp/annualreport)

The majority of the HUD complaints filed nationwide were on the basis of disability, making up 44% of all complaints received. Race was next, making up 21% of all complaints, followed by sex at 9%.

The housing complaints filed in the area were consistent with the most common causes for complaints across the nation.

#### **4. City of Salisbury Disability Advisory Committee**

The Disability Advisory Committee was established to ensure that citizens with disabilities in the City of Salisbury have equitable opportunities to participate in, benefit from, and relish the opportunities the community provides, such as housing, employment, transportation, communications, education, and entertainment.

The Disability Advisory Committee's charge is as follows:

- To advise and assist the Mayor with developing, implementing, and maintaining an Americans with Disabilities Act (ADA) Compliance Plan for the City of Salisbury.
- To serve as a resource for the Mayor and the City of Salisbury relative to issues involving the City's compliance and/or concerns expressed by its citizens.
- To establish a means by which the people with disabilities of Salisbury can formally and efficiently express concerns relative to accessibility and accommodations.
- To advise and assist with developing and maintaining a depository of related information for all concerned citizens.
- To assist the Mayor, through advocacy, education, and referral, with developing a broader appreciation and understanding of the attributes of the people with disabilities.

#### **5. City of Salisbury Human Rights Advisory Committee**

The Salisbury Human Rights Advisory Committee seeks to both recognize and celebrate the growing diversity of the Salisbury community and to advise the Mayor on topics pertaining to human rights. 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 HRAC will promote and encourage respect for the human and civil rights of all Salisbury residents, as well as work to prevent prejudice and discrimination on any basis. It will do 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.

## 6. 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:

- Bay Area Center for Independent Living (BACIL)
- Christian Shelter, Inc.
- City Staff
- Community Emergency Shelter Project (CESP)
- Deaf Independent Living Association, Inc. (DILA)
- Greater Salisbury Committee
- Habitat for Humanity of Wicomico County
- Help & Outreach Point of Entry (HOPE, Inc.)
- Homeless Alliance of the Lower Shore (HALS) CoC
- Lower Shore Workforce Alliance
- Maintaining Active Citizens, Inc. (MAC)
- MD Department of Social Services
- MD Department of the Environment
- NAACP
- Pennrose
- Salisbury Urban Ministries
- Salisbury-Wicomico Economic Development
- Salvation Army
- Village of Hope, Inc.
- Wicomico County Health Department
- Wicomico County Housing Authority

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 2024, the City has proposed to allocate its estimated CDBG funds to the projects listed in the table below.

**PY 2024 Estimated CDBG Allocation for the City of Salisbury**

| <b>COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM</b>                         |            |
|---|------------|
| Habitat for Humanity of Wicomico County – Critical Home Repairs                 | \$ 145,543 |
| Salisbury Neighborhood Housing Services – Owner-Occupied Housing Rehabilitation | \$ 145,543 |
| Program Administration  | \$ 72,771  |

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 2024-2028 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 Facilities/Services – Support supportive service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, 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 2024 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 2022, 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

#### **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).

#### **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 383 Housing Choice Vouchers, all of which are tenant based, and 215 are currently issued.

The Housing Authority administers the following programs:

- Low Income Public Housing Program
- Rental Assistance Demonstration (RAD) Program
- Capital Fund Program
- Housing Choice Vouchers Program

The Housing Authority owns and manages the following Public Housing Units:

- Booth Street, 911 Booth Street, Salisbury, Maryland 21801 - 112 units general occupancy
- Riverside Homes, 521 Alabama Ave, Salisbury, Maryland 21801 - 75 units general occupancy
- Scattered Sites - 90 units general occupancy

According to WCHA's Five-Year Plan covering 2020-2024, the mission of the Housing Authority is to promote adequate and affordable housing, economic opportunity and a suitable environment free from discrimination.

The Wicomico County Housing Authority was found to be in non-compliance with Section 504 of the Rehabilitation Act of 1973 based on a Compliance Review conducted by the Baltimore HUD Office on May 2003. The Housing Authority subsequently entered into a Voluntary Compliance Agreement with the Department. The Housing Authority is currently in compliance with its agreement.

According to the Housing Authority's waiting lists as of January 2023, there are 173 (43%) individuals with a disability on the public housing waiting list and 110 (27%) individuals with a disability on the housing choice voucher waiting list.

As of January 2023, there were 403 families on the Wicomico County Housing Authority's Public Housing Waiting List. Of those families on the waiting list: 269 (67%) were extremely low-income; 72 (18%) were very low-income; and 8 (2%) were low-income. The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households.

As of January 2023, there were 401 families on the Wicomico County Housing Authority's Housing Choice Voucher Waiting List. Of those families on the waiting list: 267 (64%) were extremely low-income; 77 (19%) were very low-income; and 15 (4%) were low-income. The largest demand for affordable housing on the waiting list is for affordable housing for extremely low-income households.

The most immediate needs of the families on the waiting list include: decent, safe, sanitary and affordable housing; supportive services such as employment training; access to transportation for commuting to work, shopping, and medical services; and living wage job opportunities.

The WCHA is in the midst of a comprehensive redevelopment plan to address the vacancies and poor living conditions at the Booth Street and Scattered Site public housing units.

Stone Grove Crossing was the first phase of the Booth Street Redevelopment Plan and started in 2014. Completed in 2018, the Housing Authority razed 50 units at Booth Street and replaced the units with 82 new housing units utilizing LIHTC and RAD funding in the amount of \$22 million. The Square at Merritt Mill is the second phase of the Booth Street Redevelopment Plan. Originally planned to complete the demolition of the remaining 50 units at Booth Street the project was relocated to Merritt Mill. The project is underway and will include 75 units of new housing construction expected to be completed in the beginning of 2020.

The 50 units at Booth Street still need to be demolished. The Housing Authority has received a grant for demolition and replacement of 3 of 5 of the buildings at Booth Street. The Housing Authority is applying for additional funding to demolish and replace the final 2 buildings at Booth Street.

Additionally, the Housing Authority is using RAD funding to renovate its 90 Scattered Site public housing units. To date, 15 units have been completed.

### **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 |

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:

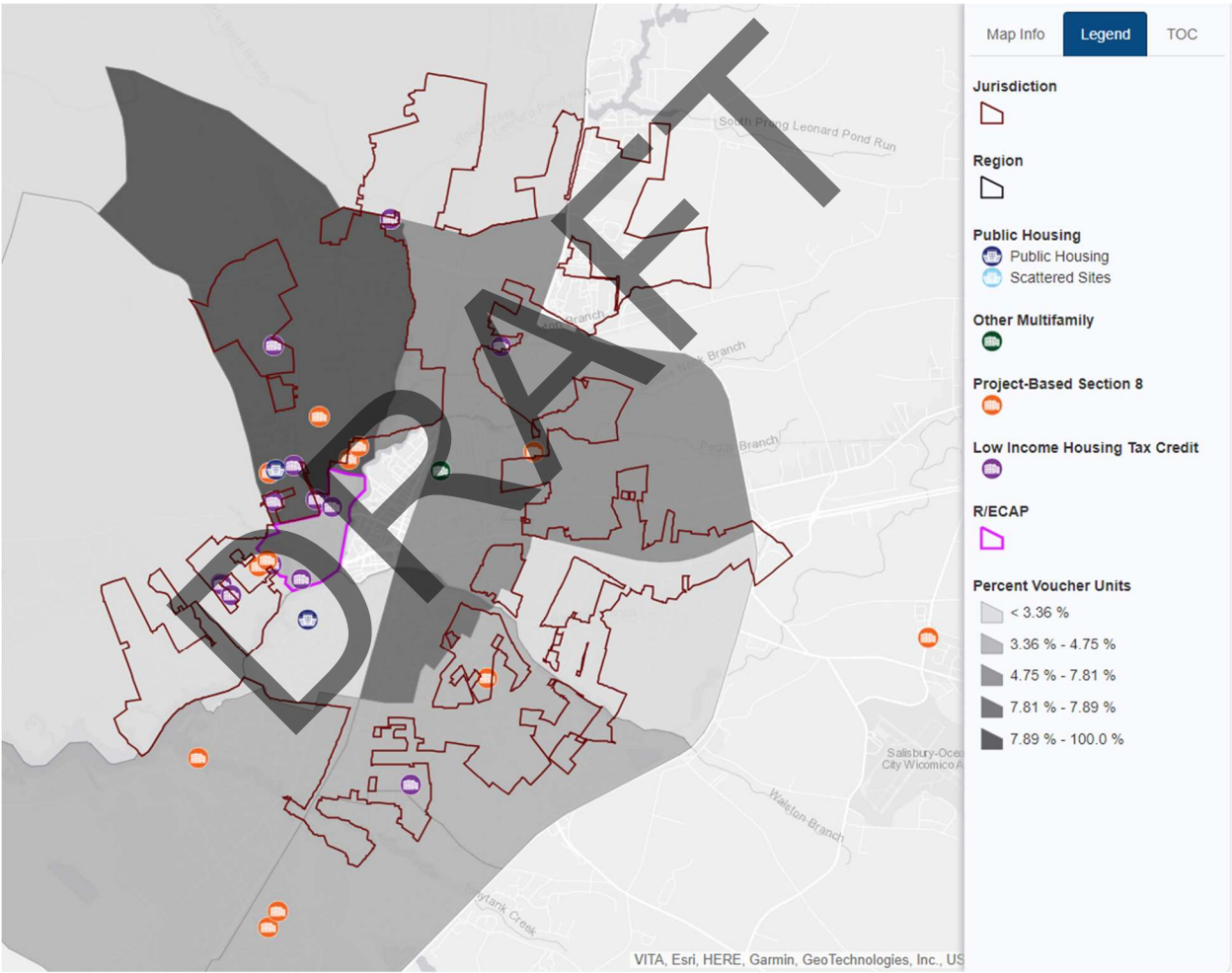
| HUD ID    | PROPERTY NAME                      | ADDRESS                 | CITY      | STATE | ZIP   | TOTAL ASSISTED UNITS | TOTAL UNITS | ASSISTANCE                      |
|-----------|------------------------------------|-------------------------|-----------|-------|-------|----------------------|-------------|---------------------------------|
| 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](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.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. Illustrated in the maps 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.

### Location of Assisted Housing



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

## 7. Planning, Zoning, and Building Codes

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 2019 Edition
- International Residential Code 2019 Edition
- International Mechanical Code, 2019 Edition
- International Energy Conservation Code 2019 Edition
- International Plumbing Code 2019 Edition
- International Fuel Gas Code 2019 Edition
- International Existing Building Code 2019 Edition
- ADA Standards for Accessible Design 2019 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.

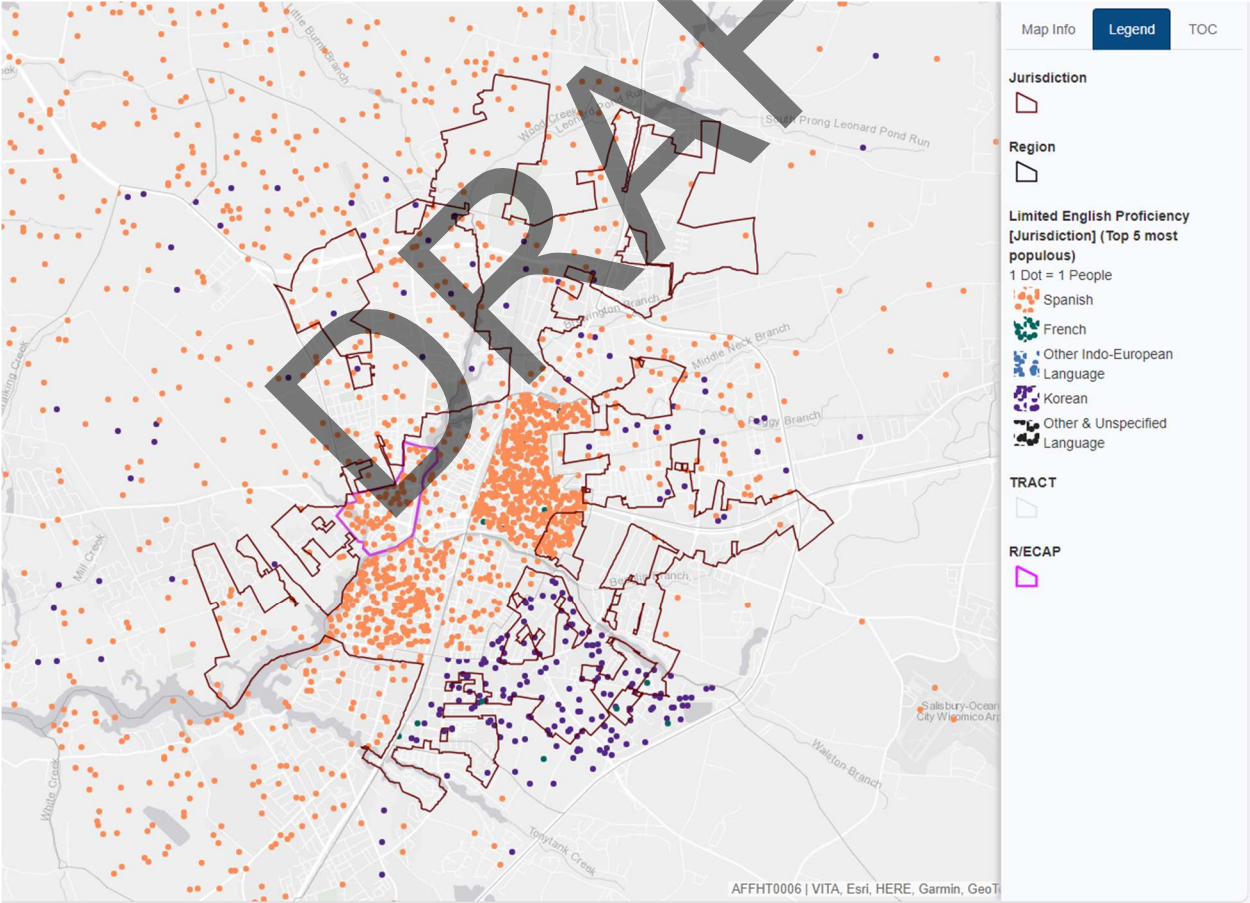
According to the 2013-2017 American Community Survey for the City of Salisbury, 16.7% of residents speak a language other than English at home. Of those residents, 55.6% report that they speak English less than “very well.” The following languages are spoken at home:

|                                    |       |
|------------------------------------|-------|
| English                            | 83.3% |
| Spanish                            | 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 Creole and Spanish speakers.

The following map highlights areas of LEP populations.

**Limited English Proficiency (LEP)**



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



## 9. 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. The following table shows the millage rates for Wicomico County:

### 2023-2024 Tax Rates in Wicomico County

| JURISDICTION    | REAL PROPERTY TAX |        |        |
|-----------------|-------------------|--------|--------|
|                 | Municipal         | County | State  |
| Salisbury       | 1.0332            | 0.8855 | 0.1120 |
| Mardela Springs | 0.2300            | 0.8855 | 0.1120 |
| Pittsville      | 0.2875            | 0.8855 | 0.1120 |
| Sharptown       | 0.6000            | 0.8855 | 0.1120 |
| Delmar          | 0.6900            | 0.8855 | 0.1120 |
| Willards        | 0.5100            | 0.8855 | 0.1120 |
| Hebron          | 0.4450            | 0.8855 | 0.1120 |
| Fruitland       | 0.8762            | 0.8855 | 0.1120 |

Source: <https://dat.maryland.gov/Documents/statistics/Tax%20Rates%202023-2024%20-%20Tax%20Table%20July%202023%20for%20Website.pdf>

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.

## 10. Comprehensive Plan

In 2010, the City of Salisbury last updated its Comprehensive Plan. The City began the process of updating its Comprehensive Plan in 2023. The 2010 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.

### **11. 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)
- Employee Section 3 Self-Certification Form
- Section 3 Employer Certification of Worker Status
- Map of Project Targeted Worker Radius

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

## **12. Transportation**

Renting or owning an affordable home is not the only factor in a resident's quality of life and access to fair housing. Having access to transportation, whether it is a private vehicle or a public bus, is just as important as the price of a rent or mortgage. Mobility determines whether a resident can access work, education, services, or healthcare.

Shore Transit, a division of the Tri-County Council for the Lower Eastern Shore of Maryland, is the public transit agency for the Maryland lower eastern shore counties of Somerset, Wicomico and Worcester. Shore Transit offers public transportation via fixed route and origin-to-destination services. The Shore Transit staff meets regularly with the Shore Transit Advisory Board to discuss issues relating to the efficient and effective operating of the transit agency. The Advisory Board is composed of representatives from public agencies, private businesses, education, and consumer advocates. The mission of Shore Transit is to provide safe, reliable, friendly, and efficient community transportation services to the residents and businesses of Somerset, Wicomico, and Worcester counties in Maryland, on clean, well-maintained vehicles, operated by trained, licensed, professionals, with a focus on excellent customer service. Shore Transit operates a safe, efficient, and effective community public transportation system.

The base single-ride fare for most local trips is \$3.00. Shore Transit offers Senior and Disabled discounts and Unlimited Weekly Bus Rides for \$25 for seven (7) days of unlimited fixed route bus rides, \$50 for fourteen (14)

days, \$75 for twenty-one (21) days, \$100 for thirty (30) days. Schedule and routes are available at <http://www.shoretransit.org/> and uses Google to translate to over 100 languages.

Shore Transit coordinates with the following agencies by providing transportation services to the Somerset DSS, Wicomico DSS, and Worcester DSS.

Guide dogs and other service animals are permitted on Shore Transit vehicles; no permit is required. All Shore Transit vehicles and facilities are handicap accessible and Shore Transit accepts portable oxygen, respirators and concentrators on all vehicles. If a disability/medical condition or public transportation system accessibility/environmental barriers, prevents the rider from utilizing the fixed route public transportation services, they may be eligible for curb-to-curb service through Paratransit Service.

### **13. Education**

Wicomico County Public Schools educate approximately 15,000 students every day, from PreK through Grade 12. Wicomico Schools offers a wide range of academically challenging programs including NexGen STEM Academy, Career and Technology Education, intermediate Magnet Program, elementary and middle school Thinking and Doing (TAD) gifted program, and more. There are four high schools with grades 9-12, one middle/high school with grades 6-12, three middle schools with grades 6-8, one elementary/middle school with grades 4-8, 16 elementary schools, as well as an Early Learning Center, an Evening High School, Choices Academy, and the Online Learning Lab. WCPS has nearly 1,300 classroom teachers and employs close to 2,400 full-time staff members. The FY 2024 Operating Budget is \$249 million; 74% of the Operating Budget is dedicated to direct instruction and the cost per pupil is \$15,921. The latest graduation rate was 84%.

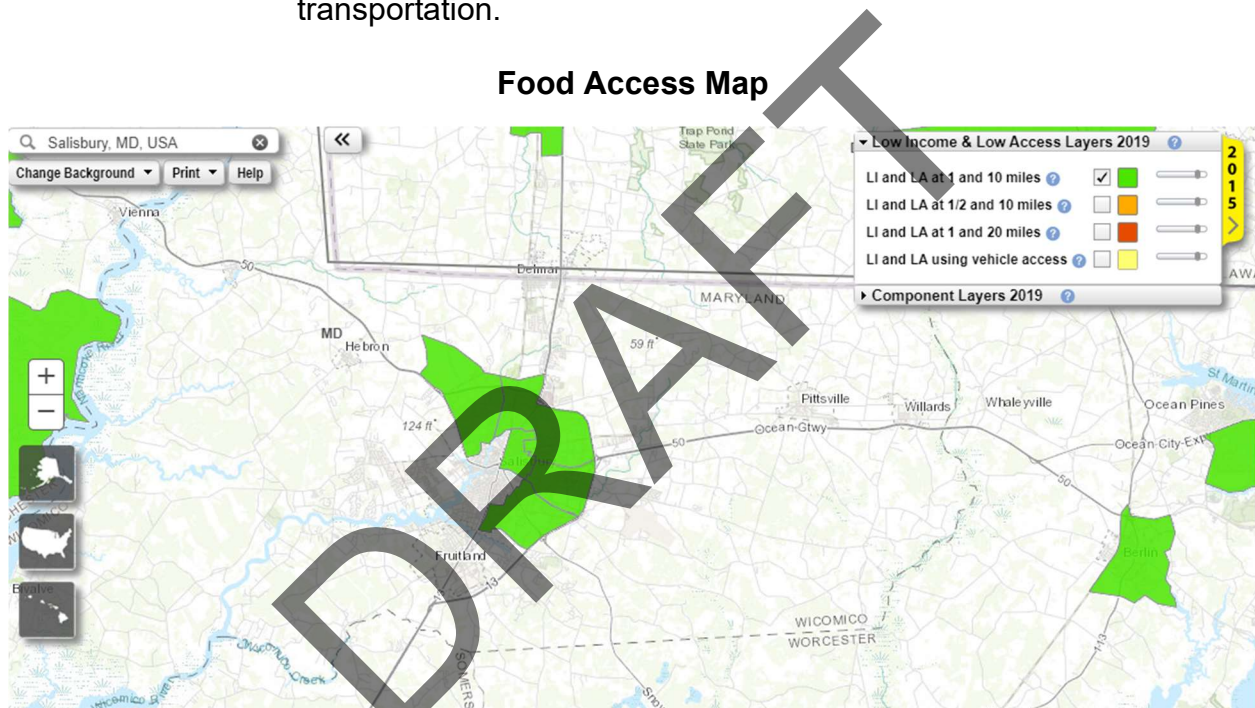
According to niche.com, “Wicomico County Public Schools is an above average, public school district located in Salisbury, MD. It has 14,664 students in grades PreK through 12 with a student-teacher ratio of 12 to 1. According to state test scores, 16% of students are at least proficient in math and 26% in reading.”

### **14. Food Access**

Limited access to supermarkets, supercenters, grocery stores, or other sources of healthy and affordable food may make it harder for some

Americans to eat a healthy diet. There are many ways to measure food store access for individuals and for neighborhoods, and many ways to define which areas are food deserts - neighborhoods that lack healthy food sources. Most measures and definitions take into account at least some of the following indicators of access:

- Accessibility to sources of healthy food, as measured by distance to a store or by the number of stores in an area.
- Individual-level resources that may affect accessibility, such as family income or vehicle availability.
- Neighborhood-level indicators of resources, such as the average income of the neighborhood and the availability of public transportation.



In the map above, low access to healthy food is defined as being far from a supermarket, supercenter, or large grocery store. A census tract is considered to have low access if a significant number or share of individuals in the tract do not have vehicles and are over a mile from a fresh food source. There are five (5) census tracts located in the City that are defined as having low access to healthy food.

### 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/](http://www.ffiec.gov/hmda/). The most recent HMDA Data is that of 2022, 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 2022 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.cfbp.gov/data-publication/aggregate-reports/2022/MD/41540>

The table below lists the lending activity that occurred during 2022 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.cfpb.gov/data-publication/aggregate-reports/2022/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 Imprvt  | 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%        |
|       | <b>TOTAL</b>                   | <b>19,557</b> | <b>12,024</b> | <b>61.5%</b> | <b>617</b> | <b>3.2%</b> | <b>3,468</b> | <b>17.7%</b> | <b>2,569</b> | <b>13.1%</b> | <b>879</b> | <b>4.5%</b> |

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/202217/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% |
| Refi         | 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.cfpb.gov/data-publication/aggregate-reports/2022/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/2022/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.cfpb.gov/data-publication/aggregate-reports/2022/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.cfpb.gov/data-publication/aggregate-reports/2022/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.cfpb.gov/data-publication/aggregate-reports/2022/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/RHS, and VA   | 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%       |
|       |   | <b>Total</b> | <b>10,983</b> | <b>7,510</b> | <b>68.4%</b> | <b>325</b> | <b>3.0%</b> | <b>1,341</b> | <b>12.2%</b> | <b>1,432</b> | <b>13.0%</b> | <b>375</b> |

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2022/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)

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#### **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.

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## 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 2024-2028 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 Need for Fair Housing Education and Outreach**

There is a need to improve the knowledge and understanding concerning the rights and responsibilities of individuals, families, members of the protected classes, landlords, real estate professionals, and public officials under the Fair Housing Act (FHA).

Goal: Improve the public's knowledge and awareness 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 actions should be undertaken:

- 1-A: Educate residents, realtors, bankers, housing providers, other real estate professionals, policy makers and municipal staff of their responsibilities under the fair housing and related statutes, regulations, and executive orders.
- 1-B: Support fair housing organizations and legal advocacy groups to assist persons who may be victims of housing discrimination.
- 1-C: Identify the language and communication needs of LEP persons to provide the specific language assistance that is required.

### **Impediment 2 Need for Affordable Housing**

In the City of Salisbury, one out of every two (52%) renter households is paying over 30% of their monthly incomes on housing costs; one out of every four (24%) owner households with a mortgage is paying over 30% of their monthly income on housing costs; and one out of every six (16%) owner households without a mortgage is paying over 30% of their monthly income on housing costs. The



number of households that are housing cost burdened significantly increases as household income decreases.

Goal: Increase the supply of decent, safe, and sanitary housing that is affordable and accessible through the new construction and rehabilitation of various types of housing, especially housing that is affordable to lower income households.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 2-A: Support and encourage private developers and non-profit housing providers to create, through construction or rehabilitation, affordable mixed-income housing.
- 2-B: Support and encourage the rehabilitation of existing renter-occupied and owner-occupied housing units in the area for households below 80% AMI.
- 2-C: Support homebuyer education, training programs, and closing cost/down payment assistance to increase the number of owner-occupied housing units; especially in response to HMDA data discrimination patterns to support higher loan to value ratios for minority homebuyers.
- 2-D: Support tenant education and maintenance training programs to encourage and support healthy rental housing units.
- 2-E: Encourage organizations serving the LMI community to develop relationships with landlords to expand the supply of affordable rental housing units.
- 2-F: Encourage affirmative marketing procedures to attract protected classes that are least likely to apply for new affordable housing opportunities.

### **Impediment 3 Need for Accessible Housing**

There is a lack of accessible housing units in the area 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 through new construction and rehabilitation of accessible housing for persons with disabilities.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 3-A: Promote the need for accessible and visitable housing by supporting and encouraging private developers and non-profits to develop, construct, or rehabilitate housing that is accessible to persons with disabilities.
- 3-B: Provide financial assistance for accessibility improvements to housing units to enable seniors and persons with disabilities to remain in their homes.
- 3-C: Promote and encourage the ADA and Fair Housing requirements for landlords to make “reasonable accommodations” to their rental properties so the units are accessible to tenants.

#### **Impediment 4 Public Policy**

The City’s Zoning Ordinance needs additional definitions and provisions to affirmatively further fair housing.

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

Strategies: In order to meet this goal, the following actions should be undertaken:

- 4-A Revise the City Zoning Ordinance to include additional definitions, statements, and revisions that adopt model fair housing zoning provisions including reasonable accommodations, transit-oriented development, and regional cooperation.
- 4-B Develop incentives to encourage developers and housing providers to offer more affordable housing options in the City.
- 4-C Encourage LMI, minority, and protected class resident participation in the various City Boards and Commissions.

#### **Impediment 5 Regional Approach to Fair Housing**

There is a need for a regional collaborative approach to affirmatively further fair housing in the area.

Goal: Form a regional cooperative fair housing consortium to affirmatively further fair housing in the area.

Strategies: In order to meet this goal, the following actions should be undertaken:

- 5-A: Form a regional fair housing partnership with existing organizations to encourage fair housing choice throughout the area, fair housing activities, and projects.
- 5-B: Maintain a regional database of decent, safe, and sanitary housing that is affordable and accessible for households below 80% AMI.
- 5-C: Work collaboratively with affordable housing developers and providers to ensure affirmative fair marketing plans and deconcentration policies are created and implemented.
- 5-D: Support the Wicomico County Housing Authority to affirmatively further fair housing.

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