

Analysis of Impediments to Fair Housing Choice

DRAFT

City of Camden, New Jersey

Prepared by:



March 2020

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Executive Summary

The City of Camden, New Jersey 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 "affirmatively further fair housing," each entitlement community must conduct a Fair Housing Analysis which identifies any impediments to fair housing choice and take steps to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address "Visitability," the Section 504 Rehabilitation Act, the Americans with Disabilities Act, as well as the Fair Housing Act.

HUD's Fair Housing and Equal Opportunity (FHEO) Office is now advising federal entitlement communities to update their Analysis of Impediments (AI) to Fair Housing Choice with the preparation of their Five-Year Consolidated Plans, and then every five (5) years thereafter. In addition, each year Camden, as part of its Annual Action Plan, must certify that the municipality will affirmatively further fair housing. This means that Camden 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 Department of Housing and Urban Development requires that an AI include:

- An analysis of demographic, income, housing and employment data
- An evaluation of the fair housing complaints filed in the jurisdiction
- A discussion of impediments: if any, in 1) the sale or rental of housing; 2) provision of brokerage services; 3) financing, 4) public policies; and 5) administrative policies for housing and community development activities that affect housing choice for minorities
- An assessment of current fair housing resources
- Conclusions and recommendations

The AI utilizes publicly available data from a number of sources, including:

- Census and other demographic data
- Consolidated Plan and associated planning documents
- Fair housing complaint data will be maintained by New Jersey Department of Law and Public Safety's Division on Civil Rights and local Fair Housing Agencies (described herein)
- Fair housing testing complaint and education/outreach data maintained by local Fair Housing Agencies
- Internet resources on fair housing

In addition to the identification of impediments, jurisdictions are required to develop methods to address the issues that limit the ability of residents to rent or own housing, regardless of their inclusion in a protected class.

The purpose of this *Analysis of Impediments to Fair Housing* for Camden is to evaluate the housing characteristics, to identify blatant or defacto impediments to fair housing choice, and to arrive at a strategy for expansion of fair housing opportunities throughout the City. This Fair Housing Plan is intended to help create an atmosphere for community change that will remove systematic impediments to fair housing while helping to create and improve the climate of fair housing choice in Camden. The Plan will:

- Provide documentation of the fair housing planning process;
- Educate and raise awareness among the public, public officials, advocate groups, and housing providers;
- Establish the need for the proposed actions;
- Indicate appropriate actions and their intended outcomes;
- Identify the need for community partners that can offer resources or accept responsibility for parts of the Plan; and
- Provide for periodic review, evaluation, and revision of the Plan as part of the Consolidated Planning Process.

With the acceptance of the *Analysis of Impediments to Fair Housing*, the community will have an updated baseline for progress against which implementation efforts will be judged.

Fair Housing Defined

Fair housing choice is defined 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." The Fair Housing Analysis encompasses the following six areas:

1. The sale or rental of dwellings (public or private);
2. The provision of housing brokerage services;
3. The provision of financing assistance for dwellings;
4. 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;
5. The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and

6. Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (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 legislative basis for HUD's review of fair housing practices in communities receiving federal funds is the Civil Rights Act of 1968. On the 20th anniversary of the passage of the legislation, an amendment to Title VIII of the Civil Rights Act was passed. The amendment, which is known as the Fair Housing Act of 1988, expanded the scope of coverage of the law to include, as protected classes, families with children and handicapped persons. Further, enforcement powers for HUD including a monetary penalty for discrimination were added.

New Jersey Fair Housing and Discrimination Information is administered by the New Jersey Department of Community Affairs within the Division of Housing & Community Resources. It provides that the Fair Housing Act prohibits discrimination in housing because of:

- race or color
- national origin
- religion
- sex
- familial status (including children under the age of 18 living with parents or legal custodians; pregnant women and people securing custody of children under 18)
- handicap (disability)

The Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family housing sold or rented without the use of a broker and housing operated by organizations or private clubs that limit occupancy to members.

Based on the Fair Housing Act, as amended, there are seven technical requirements in the Accessibility Guidelines for covered buildings that optimize public health and safety standards to further fair housing practices.

The Fair Housing Act further:

- Prohibits housing discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability.
- Sets certain requirements for accessible design in new construction.
- Covers residential multi-family dwellings for first occupancy after March 13, 1991 (covered multi-family dwellings are all types of buildings with four or more units).

- Includes condos, single-story townhouses, garden apartments, vacation timeshares, dormitories, homeless shelters.
- Requires covered buildings with an elevator to make all units in buildings accessible.
- Requires covered buildings without an elevator to make all ground-floor units (including ground-floors at different levels in the same building) accessible.

The Fair Housing Act prohibits landlords from taking any of the following actions based on race, religion or any other protected category:

- Advertising or making any statement that indicates a preference based on a group characteristic, such as skin color.
- Falsely denying that a rental unit is available.
- Setting more restrictive standards, such as higher income, for certain tenants.
- Refusing to rent to members of certain groups.
- Refusing to accommodate the needs of disabled tenants, such as allowing a guide dog.
- Setting different terms for some tenants, such as adopting an inconsistent policy of responding to late rent payments, or terminating a tenancy for a discriminatory reason.

In addition to the Fair Housing Act, the New Jersey Law Against Discrimination (LAD) makes it unlawful to subject people to differential treatment based on race, creed, color, national origin, nationality, ancestry, age, sex, (including pregnancy), familial status, marital status, affectional or sexual orientation, atypical hereditary cellular or blood trait, genetic information, liability for military service, and mental or physical disability, including perceived disability and AIDS and HIV status. The LAD prohibits unlawful discrimination in employment, housing, places of public accommodation, credit and business contracts.

On September 5, 2002, former Governor Jim McGreevey signed the Section 8 Anti-Discrimination bill which increases penalties for landlords who refuse to rent or lease to persons who receive federal rent subsidies or have children under the age of 18 (senior and age-restricted housing excluded). Under this law, a landlord who discriminates can be fined up to \$10,000 for a first offense and up to \$25,000 for a second offense. A person bringing action because of discrimination may be awarded a reasonable attorney's fee.

This law amends the existing "Law Against Discrimination" by prohibiting landlords from discriminating against tenants based upon a tenants' source of lawful income, such as Section 8 vouchers, or the age of their children. In addition, it also broadens the powers of housing authorities so that they can bring suit on behalf of a tenant who is discriminated against. The law is supported by a 1999 state Supreme Court ruling that says landlords cannot deny an apartment to tenants based solely on their sources of income.

All housing discrimination complaints are filed locally with the New Jersey Department of Law and Public Safety's Division on Civil Rights, via their State Headquarters or their regional offices.

Research

- i. A review of the City of Camden 2010 Analysis of Impediments to Fair Housing Choice;
- ii. A review of the FY 2015-2019 Consolidated Plan, FY 2018 and FY 2019 Annual Action Plans, and Consolidated Annual Performance Evaluation Reports for FY 2015 through FY 2018;
- iii. A review of the City's Zoning Ordinance and Master Plan;
- iv. A review of the Camden Housing Authority Five Year Plan;
- v. A review of the Camden County 2019 Point in Time Report;
- vi. The most recent demographic data for the Camden was analyzed from the U.S. Census and American Community Survey, which included general, demographic, housing, economic social, and disability characteristics;
- vii. Camden demographic and land use data was analyzed from the Delaware Valley River Planning Commission Data Navigator;
- viii. A review of the residential segregation data from Census Scope was completed;
- ix. A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken;
- x. A review information provided by the U.S. Department of Housing and Urban Development's Affirmatively Furthering Fair Housing Data and Mapping Tool;
- xi. A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed;
- xii. A review of the real estate and mortgage practices was undertaken; and
- xiii. Home mortgage foreclosure data was reviewed.

Interviews & Meetings

The City of Camden administration maintains an ongoing dialogue with its constituents and organizations representing various groups within Camden. One of the benefits of doing so is an ongoing awareness on the part of the City of the needs of Camden's residents. Some of those needs fall within the parameters of the CDBG program and are reflected as part of the Analysis of Impediments. Additionally, the City maintains an ongoing relationship with more than 80 other municipalities, government agencies, school districts and community service organizations via e-mail, conference calls, face-to-face meetings, and conferences. Again, this continuous, if sometimes informal, interaction allows Community Development staff to stay abreast of community needs and opportunities.

In addition to the continuous dialogue, City staff also conducted formal methods of gathering information and public input, in accordance with their Citizen Participation Plan. Meetings and/or interviews were conducted with the following agencies: Camden City School District, Camden Coalition of Healthcare Providers, Camden Housing Authority, Catholic Charities, CHW Project Hope, Inc., City of Camden, Community Planning and Advocacy Council, DePetro Real Estate Organization, Habitat for Humanity, ICCI, Joseph's House of Camden, Lanning Square West Residents Association, Saint Joseph's Carpenter Society, WERC, and Volunteers of America.

Electronic Surveys were sent to residents groups and each housing, social service, and community development agency in the city. This survey, sent in both English and Spanish, had 207 respondents (200 in English/7 in Spanish).

In addition to residents, the following agencies were in attendance for the public hearings held by the City: Camden Coalition of Healthcare Providers, City of Camden, DePetro Real Estate Organization, Lanning Square West Residents Association, and WERC.

In addition to residents, the following agencies were in attendance for three virtual focus groups (Housing and Economic Development, Homelessness and Social Services): Camden City School District, Camden Coalition of Healthcare Providers, Camden Housing Authority, Catholic Charities, CHW Project Hope, Inc., City of Camden, Community Planning and Advocacy Council, DePetro Real Estate Organization, Habitat for Humanity, ICCI, Joseph's House of Camden, Saint Joseph's Carpenter Society, WERC, and Volunteers of America. In addition, staff from Clarifi provided written comment.

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.
- Locations of Section 8 Voucher units.
- Fair housing awareness in the community was evaluated.
- Distribution of public and assisted housing units was analyzed and mapped.
- The location of CDBG expenditures throughout the Municipality was analyzed.
- The location of HOME expenditures throughout the Municipality was analyzed.
- The Municipality's Five-Year Goals and Objectives were reviewed.
- Potential Impediments
- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.
- The status of previously identified impediments was analyzed.

Citizen Participation

Given existing public health concerns in the United States, including New Jersey, the draft of this 2020 Analysis of Impediments to Fair Housing Choice was made available on the City of Camden's website only.

This was done to gather additional public comment on the AI Plan. The display period was from April 1, 2020 through May 1, 2020.

The Analysis of Impediments is scheduled to be approved by the Camden City Council at its meeting on May 12, 2020.

Impediments to Fair Housing Identified (DRAFT LIST)

Impediment I – Lack of Education Regarding Fair Housing Laws

Impediment II – Lack of Awareness Regarding Complaint Process

Impediment III – Transportation Availability and Access to Jobs

Impediment IV – Bias in Lending, Credit Counseling & Money Management

Impediment V – Lack of Affordable Housing

Impediment VI – Language Access for Limited English Proficient (LEP) Persons

Impediment VII – Access to Affordable Housing

Impediment VIII – Geographic Concentration of Minority & Ethnic Groups

Introduction

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All housing discrimination complaints are filed locally with the New Jersey Department of Law and Public Safety's Division on Civil Rights, via their State Headquarters or their regional offices.

WHO CONDUCTED

Camden is a HUD CDBG entitlement community. The City of Camden's Bureau of Grants Management and Division of Planning and Development were jointly responsible for preparation of the *Analysis of Impediments to Fair Housing* under the direction of the Mayor of Camden and the Camden City Council.

PARTICIPANTS

The City of Camden, as an Entitlement Community as designated by the U.S. Department of Housing and Urban Development (HUD), receives CDBG, HOME, HOPWA and ESG funds.

Consistent with the development of the Consolidated Plan, the AI has been developed in compliance with the City's Citizen Participation Plan and process. To ensure compliance with the regulations relating to the Citizen Participation process the City did the following:

- Followed the most current Citizen Participation Plan
- Published notices prior to public hearings
- Held virtual public hearings to maintain public participation despite current closures due to health concerns
- Held focus groups with community stakeholders and municipal leadership to understand the current status of fair housing at the community level
- Published a summary of the AI on the City's website for public review for a period of thirty days prior submission to HUD
- Provided citizens, agencies or other interested parties access to records relating to the provision of funds for affordable housing activities during the preceding five-year period
- Considered the views and comments received and incorporate same in the Five-Year Consolidated Plan

METHODOLOGY USED

The preparation of the Analysis of Impediments to Fair Housing included research on most recently available demographic data regarding population, housing, income, and employment. Additionally, the City conducted a comprehensive review and analysis of public policies affecting housing. The community also examined administrative policies concerning housing and community development, and their administration in the community. Using the listed information, Camden was able to prepare actions to be completed that affirmatively further the provision of fair housing in the jurisdiction. This revised Analysis of Impediments to Fair Housing was undertaken, at the City's direction, by Triad Associates, Inc., a community planning and development consulting firm.

Research

- i. A review of the City of Camden 2010 Analysis of Impediments to Fair Housing Choice;
- ii. A review of the FY 2015-2019 Consolidated Plan, FY 2018 and FY 2019 Annual Action Plans, and Consolidated Annual Performance Evaluation Reports for FY 2015 through FY 2018;
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- The Municipality's Five-Year Goals and Objectives were reviewed.
- Potential Impediments
- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.
- The status of previously identified impediments was analyzed.

Citizen Participation

The City of Camden's Citizen Participation process has four (4) goals, as related to the CDBG and HOME programs:

1. To present in a logical sequence the various components of the Consolidated Plan;
2. To identify the responsible departments or agencies of the City government who administer the various activities relating to the Consolidated Plan;
3. To clarify the opportunities which citizens, community organizations, and neighborhood groups, and others have to work with Municipal and City officials in developing each component of the Consolidated Plan and the activities within; and
4. To indicate the alternate courses of action which the Federal program(s) regulations make available to citizens, organizations and local government.

The citizen participation process for the 2020-2024 Consolidated Plan, the 2020 Annual Action Plan and the Analysis of Impediments included:

1. Community Survey conducted from January 2020 through March 2020
2. The annual Grants Seminar was conducted the Ray and Joan Kroc Center on November 7, 2019
3. A Needs Assessment Virtual Public Hearing on March 19, 2020
4. The deadline for RFPs was February 3, 2020
5. The various levels of staff, CPAP, Administrative and Executive review were conducted between February 12, 2020 and March 12, 2010

6. A Second Virtual Public Hearing on the draft Consolidated Plan, draft Action Plan and a general discussion of the Analysis of Impediments was held on April 9, 2020
7. A final Public Meeting was held on April 27, 2020 with approval by the City Council on May 12, 2020 and submission to the Newark HUD Office on May 15, 2020.

Given existing public health concerns in the United States, including New Jersey, the public hearings have been held virtually via the Zoom video conferencing platform. Notice of these virtual public hearing was printed in the paper, City's website and circulated on social media. A draft of this 2020 Analysis of Impediments to Fair Housing Choice was made available on the City of Camden's website only. This was done to gather additional public comment on the AI Plan. The display period was from April 1, 2020 through May 1, 2020.

In an effort to encourage participation by minorities and those with special needs the City held the virtual public meetings at times convenient to all residents. All survey forms were translated into Spanish as were all public meeting notices.

The only comment that were submitted came from Stephanie Bittner, Community Outreach Manager for Clarifi. Comments made at the public meeting were re-stated in Ms. Bittner's e-mail to June Morton of the Department of Development and Planning of March 30, 2010. "It was nice to speak to you yesterday and very informative to be able to review the 5-year plan for the City. I attended yesterday both as an employee of Clarifi but also as a resident. And I have to say, it's great to see all the wonderful things planned for our city." The remained of the e-mail dealt with inviting Ms. Morton to visit their facility and become more aware of their services.

HOW FUNDED

Camden funded the *Analysis of Impediments to Fair Housing* with funds from its CDBG and HOME entitlements.

CONCLUSIONS: IMPEDIMENTS FOUND AND ACTIONS TO ADDRESS IMPEDIMENTS

Camden has prepared this 2020 of Impediments to Fair Housing Choice to focus on the status and interaction of the following fundamental conditions within Camden.

CDBG PRIORITIES:

The City of Camden focuses its CDBG entitlement funds toward improving the quality of life for its residents, who are extremely low, very low, and low-income, and to preserve and increase the housing stock of affordable owner and renter housing units. The FY 2015-2019 Consolidated Plan prioritized the use federal and non-federal resources to address the needs of very low, low- and moderate-income persons and families based on five goals. These goals include:

- Provide Decent Housing,
- Provide a Suitable Living Environment,
- Expand Economic Development Opportunities,
- Increase Home Ownership Among Minorities, and

- End Chronic Homelessness.

The housing and community development activities described in the Consolidated Plan include: housing production; homeownership and housing preservation activities; public services provided to community members, particularly young people and elderly persons through the City's Department of Health & Human Services and nonprofit organizations; the development and upgrading of public facilities; neighborhood economic development activities; land assembly activities; housing and services to homeless people and others with affordable housing and supportive service needs; and housing and services for persons living with HIV/AIDS.

Given changes that have taken place in the community over the last five years, CDBG priorities for Camden moving forward over the next five years include the following:

[TBD based on 2020-2024 Consolidated Plan]

HOUSING NEEDS:

The following priority housing needs have been identified in preparation for Camden's FY 2020-2024 Consolidated Plan:

[TBD based on 2020-2024 Consolidated Plan]

COMMUNITY DEVELOPMENT NEEDS:

Execution of anti-poverty efforts that support and build upon existing programs, relate to economic development efforts and integrate job training and placement, welfare to work initiatives and other programs aimed at improving opportunities for economic self-sufficiency.

[TBD based on 2020-2024 Consolidated Plan]

Conclusions: Impediments found and actions to address impediments

Impediment I – Lack of Education Regarding Fair Housing Laws

As in many municipalities, there is an increased need for education, outreach, and referral regarding the Fair Housing Act and the New Jersey Law Against Discrimination (LAD). The LAD prohibits discrimination when selling or renting property. The law covers owners, agents, employees and brokers and makes it unlawful to refuse to rent, show or sell property based on a person's race, creed, color, national origin, nationality, ancestry, marital status, domestic partnership status, familial status, affectional or sexual orientation, sex, or mental and physical disability, including AIDS and HIV-related illness.

Actions to Address Impediment I

[TBD]

Impediment II – Lack of Awareness Regarding Complaint Process

Some confusion exists concerning whom to turn to when a violation of fair housing law is alleged to occur, as well as how to access the State and Federal fair housing complaint system. In addition, the State and Federal processes to file a fair housing complaint are viewed as complicated. There is a general fear of retaliation that may prevent complainants from filing a fair housing complaint.

Actions to Address Impediment II

[TBD]

Impediment III – Transportation Availability and Access to Jobs

Camden's network of transportation facilities plays an important role in the economy of the region and of the City. Since the City's road network is essentially built out, maintaining and selectively improving Camden's system of roadways and bridges to provide for safe and efficient movement of people, goods and services is emphasized over major new roadway construction. Furthermore, the existence of viable public transportation is key for residents to be able to access jobs in and outside of the city. This is especially true for those resident that experience reverse commuting challenges.

Actions to Address Impediment III

[TBD]

Impediment IV – Bias in Lending, Credit Counseling & Money Management

The most common cause of denial is lack of credit history or poor credit history. More consumer education on credit and purchasing a home needs to be available.

Action to Address Impediment IV

[TBD]

Impediment V – Lack of Affordable Housing

The City of Camden has a long-standing commitment to providing affordable housing and has consistently used available resources to support this goal.

Homeownership is inaccessible to many Camden residents who may need assistance in obtaining credit or who may not have sufficient funds to pay for down payment and closing costs. The City has supported housing counseling services and financing support to help address these barriers on an ongoing basis.

The combination of land assembly, environmental remediation, and construction/rehabilitation costs amounts to a significant per-unit expense for affordable housing producers, and the need for gap financing is significant in every area of the City.

Action to Address Impediment V

[TBD]

Impediment VI – Lack of Housing for the Disabled

A handicap is defined as a physical or mental impairment that substantially limits one or more life activities. Discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made is prohibited. Reasonable accommodation may include changes to address the needs of the disabled persons and may include adaptive structural changes as well as administrative changes, provided these changes can reasonably be made.

Persons with disabilities face other challenges that may make it more difficult to secure both affordable or market-rate housing, such as lower credit scores, the need for service animals (which must be accommodated as a reasonable accommodation under the Fair Housing Act), the limited number of accessible units, and the reliance on Social Security or welfare benefits as a major income source.

Action to Address Impediment V

[TBD]

Impediment VI – Language Access for Limited English Proficient (LEP) Persons

Over the past several years, the City has recognized the cultural diversity of Camden residents and understands the need to address the language access needs of underserved, limited English proficient residents. For example, Hispanics are the fastest growing segment of City’s population. The City experienced a significant growth amongst Latino populations (17% increase from 2000 to 2017) a continuation of a similar trend and demographic shift that occurred in the 1990s.

The percentage of Hispanic persons is significantly above the state and national percentages at 48.5% of the City’s total population. According to the 2013-2017 ACS, 30.7% of Camden residents identified themselves as being of Puerto Rican heritage. This constitutes the 10th highest proportion of Puerto Ricans in a municipality on the United States mainland.

Actions to Address Impediment VI

Executive Order (EO) 13166, signed on August 11, 2000, directs all federal agencies, including HUD, to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ's Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance. As such, the City will update and implement the following:

- **Language Access Plan:** This identifies the Limited-English speaking population in our community and ways in which language access will be provided.
- **Provide appropriate language assistance:** For example, translation of materials, staff training, interpreters, and coordination with other services/agencies for translation services.
- **Affirmative Marketing Plan.** When a rental housing or homeowner project containing five or more units is planned to be constructed, the City and/or its subrecipients will provide information to the community that attract eligible persons who are least likely to access

affordable housing opportunities. This may include low- to moderate-income individuals, minority residents, the LEP population, and residents of manufactured housing. With changing demographics in Camden, there are challenges when marketing to the eligible populations that are Limited English Proficient (LEP). In areas where there is a significant LEP population, Camden will continue strive to meet this need by:

- Translating key marketing materials;
- Working with the minority-owned print media, radio and television stations;
- Partnering with faith-based and community organizations that serve newly arrived immigrants;
- Promoting and offering marketing activities and educational sessions in Spanish at community outreach events, such as Homebuyer Fairs; and
- Providing a stipend to bi-lingual staff members who work directly with and provide assistance to the LEP population.

Additional guidance on Limited English Proficiency guidance from HUD can be found at: <http://www.hud.gov/offices/fheo/promotingfh/lep-faq.cfm>.

Impediment VII – Access to Affordable Housing

Access to affordable housing opportunities are usually dissuaded by awareness of available opportunities. The Affirmative Marketing Program is a regional marketing strategy designed to attract buyers and/or renters of all majority and minority groups, regardless of race, creed, color, national origin, ancestry, marital or familial status, gender, affectional or sexual orientation, disability, age or number of children to housing units which are being marketed by a developer or sponsor of affordable housing. The Affirmative Marketing Program is also intended to target those potentially eligible persons who are least likely to apply for affordable units in that region.

Actions to Address Impediment VII

[TBD]

Impediment VIII – Geographic Concentration of Minority & Ethnic Groups

The 2014-2018 ACS determines that areas of racial concentration occur within 14 census tracts throughout the City among four (4) racial and ethnic groups. No Census Tracts have multiple racial concentrations within a one census tract. The first area of concentration is an analysis using a minority group within the City (Asian , Non-Hispanic), whereby Census Tract 6011.02 has a disproportionate number of Asian, Non-Hispanic residents, approximately 18.2% of the population in that area and well more than 10 percentage points above the City's overall percentage. This is an area of Pavonia in East Camden adjoining a part of Pennsauken Township that also has a relatively large Asian population. This area is majority Hispanic but does not have a concentration of Hispanic residents, it is adjacent to where to all areas of Hispanic concentration in Camden.

Actions to Address Impediment VIII

[TBD]

Demographic Background Data

Demographic Data

In this section of the *Analysis of Impediments to Fair Housing*, demographic and socio-economic characteristics of the City are described to identify conditions and trends within the City. The demographic data will serve as a basis for determining needs and identifying impediments to fair housing choice.

The statistical information in this section of the *Analysis of Impediments to Fair Housing*, unless noted, was derived from census reports published by the U.S. Bureau of the Census, Comprehensive Housing Affordability Strategy, the City's Five-Year Consolidated Plan and ESRI Business Analyst Online (BAO) data.

The City of Camden, New Jersey, is the sixth largest city in the State of New Jersey and the largest in Camden County. It serves as the County seat for Camden County, New Jersey, and is the governmental center for South Jersey. It has a total land area of approximately 9 square miles. Camden borders Collingswood Borough, Gloucester City, Haddon Township, Pennsauken Township, and Woodlynne Borough. Just offshore of Camden is Petty's Island, which is officially part of Pennsauken Township.

One of the most popular attractions of Camden is the city's waterfront, along the Delaware River. The waterfront is highlighted by its three (3) main attractions, the USS New Jersey; the BB&T Pavilion and the Adventure Aquarium.

The Adventure Aquarium was originally opened in 1992 as the New Jersey State Aquarium at Camden. In 2005, after extensive renovation, the aquarium was reopened under the name Adventure Aquarium. The aquarium was one of the original centerpieces in Camden's plans for revitalizing their city.

The BB&T Pavilion is a 25,000-seat open-air concert amphitheater that was opened in 1995 that holds concerts throughout the summer months that are a major draw to the City's waterfront.

The USS New Jersey (BB-62) was a U.S. Navy battleship that was intermittently active between the years 1943 and 1991. After its retirement, the ship was turned into a museum along the waterfront that opened in 2001. The New Jersey saw action during World War II, the Korean War, the Vietnam War, and provided support off Lebanon in early 1983.

Other attractions at the Waterfront are the Wiggins Park Riverstage and Marina, One Port Center, The Victor Lofts, the Walt Whitman House, the Walt Whitman Cultural Arts Center, the Rutgers-Camden Center For The Arts and the Camden Children's Garden.

The Waterfront is also served by two modes of public transportation. New Jersey Transit serves the Waterfront on its River Line, while people from Philadelphia can commute using the RiverLink Ferry, which connects the Waterfront with Old City Philadelphia.

Population, Race, Ethnicity and Religion

Population

As of the 2014-2018 American Community Survey U.S. Census, there were 74,608 people, 24,727 households, and 15,775 families residing within the City of Camden. The population density was 8,362.91 people per square mile.

Summary			
	2000 [†]	2010 [†]	2018 [‡]
Population	79,904	77,344	74,608
Households	24,177	24,475	24,727
Families	17,434	16,918	15,775

[†] 2000 and 2010 U.S. Census

[‡] 2014-2018 American Community Survey

Camden has seen near constant population decline (except for 1980-1990) since 1950, when the population was at its peak of 124,555. Since 2000 the City's current population has decreased by -6.62% and has lost over 5,000 residents. In 2000, the Census count in the market area was 79,904. The rate of change from 2000 to 2010 was -0.32% annually, whereas the rate of change from 2010 to 2018 was -0.44% - as the rate of population decline grew annually. Though the Delaware Valley regional Planning Commission, projects that in 2045 the City will have grown to 78,169 a projected 2.7% growth from 2015, when the projection study was completed. Currently, the population is 47.88% male and 52.12% female.

The household count within the City has changed from 24,475 in 2010 to 24,727 as of 2018 estimates, a change of -0.13% annually. Average household size is currently 2.91, compared to 3.12 in the year 2000. The number of families, as of 2018 estimates, is 15,775 in the City of Camden.

As of 2018 32.2% of the 29,938 housing units within the City are owner occupied, whereas 50.36% are renter occupied and 17.41% are vacant. In 2010, there were 28,358 housing units – of which 33.8% were owner occupied, 52.5% were renter occupied and 13.7% vacant. The rate of change in housing units has not significantly changed over the decade.

According to the 2014-2018 American Community Survey, the median household income is \$27,070.00 in Camden compared to \$60,293.00 for all U.S. households. In 2013, Camden's median household income was \$26,202(2006-2010 ACS), compared to \$23,421 in 2000. Current average household income is \$40,015 in Camden , compared to \$84,938 for all U.S. households. In 2013, average household income was \$38,003, compared to \$33,201 in 2000 in Camden. Current per capita income is \$14,747.00 in the market area, compared to the U.S. per capita income of \$32,621.00. In 2013, the per capita income was \$13,385, compared to \$9,815 in 2000.

The City of Camden contains nineteen (19) Census Tracts with sixty-two (62) Block Groups, of which forty-five (45) Block Groups have low- and moderate-income ratios above 70%. Only three (3) Census Tracts have less than 51% low- and moderate-income ratios. Overall, the City's low- and moderate-income ratio is 78.41% (per the ACS 5-Year 2011-2015 Low- and Moderate-Income Summary Data). The City will direct its resources throughout qualifying geographic areas during the 5-year plan cycle to promote a variety of

housing and community development activities. However, the City will continue to target available resources in approved redevelopment areas pursuant to the New Jersey Local Housing and Redevelopment Law (LRHL) (N.J.S.A. 40A:12-1 et seq.).

According to the 2013-2017 5-Year ACS, 37.4% of residents within Camden City live in poverty. This is a stark comparison and improvement for City's residents, as census data from 2006 had 52% of the city's residents living in poverty, which at the time was the highest rate in the Nation – making Camden America's poorest City. Currently, forty-eight percent (48%) of related children under 18 were below the poverty level, compared with 28.7% of people 65 years old and over. Comparably, thirty-five percent (35%) of all families and 46% of families with a female household and no husband present had incomes below the poverty level.

Race

The table below shows the racial composition of the City population. The percentage of White persons is well below the state and national percentages, while the percentages for other Black persons are well above. The percentage of Hispanic persons is significantly above the state and national percentages.

Racial Composition (Percentage)			
Race & Ethnicity	Camden City	NJ	US
White, Non-Hispanic	5.9%	55.8%	61.1%
Black, Non-Hispanic	39.9%	12.7%	12.3%
American Indian and Alaska Native , Non-Hispanic	0.2%	0.1%	0.7%
Asian , Non-Hispanic	2.6%	9.3%	5.4%
Native Hawaiian and Other Pacific Islander, Non-Hispanic	0.1%	0.0%	0.2%
Some Other Race, Non-Hispanic	0.3%	0.4%	0.2%
Two or More Races, Non-Hispanic	0.8%	1.7%	2.4%
Hispanic	50.3%	19.9%	17.8%

2014-2018 ACS 5-Year Estimates

Camden is a racially and ethnically rich city with a racial and ethnic composition of 39.9% African-American, 50.3% Hispanic, 0.3% Some Other Race, 5.9% White, 2.6% Asian and 1.1 % others (American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander and Two or More Races). While the City in 2000 had a plurality of Black, Non Hispanic residents, as of 2010 the City's largest group is Hispanic, and as of 2018 there is a Hispanic Majority in the City of Camden. According to the 2014-2018 ACS, 30.8% of Camden residents identified themselves as being of Puerto Rican heritage. Approximately, 15.2% of the population is foreign-born, a majority of which come from the Caribbean (mostly Dominican Republic), Central America (mostly Mexico) and South Eastern Asia (mostly Vietnam).

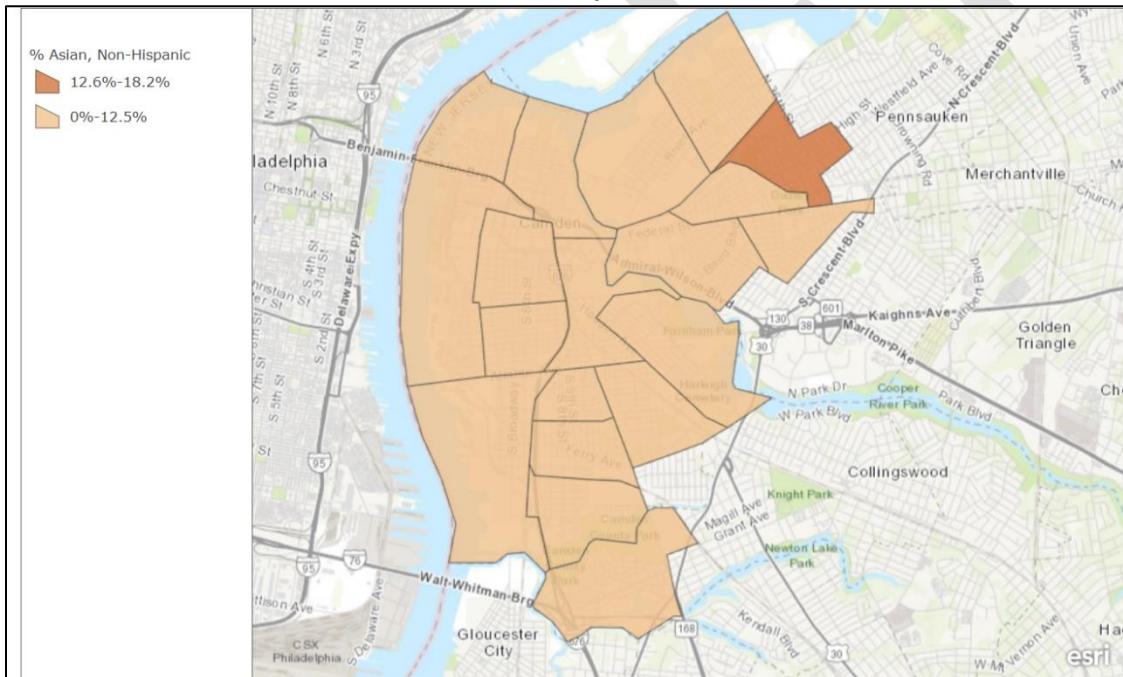
Areas of Racial or Ethnic Concentration

HUD defines areas of racial or ethnic concentration as geographic areas/census tracts where the percentage of a specific minority or ethnic group is 10 percentage points higher than a City's overall percentage. While segregation may exist, it alone is not definitive proof of discrimination in the housing market; it may indicated discrimination or else suggests other factors are at work limiting housing choices of racial and ethnic group.

The two (2) most significant racial and ethnic groups within the City include Black, Non Hispanic and Hispanic Origin (Any Race). For the purposes of this analysis, an area of concentration occurs for Blacks , Non Hispanic when the population is equivalent to 49.9% or more, and 60.3% or more for those of Hispanic Origin, even though Hispanic is not a minority in Camden. Areas with more 15.9% White Non-Hispanic populations and 12.6% or more Asian, Non-Hispanic populations are also considered areas of racial concentrations.

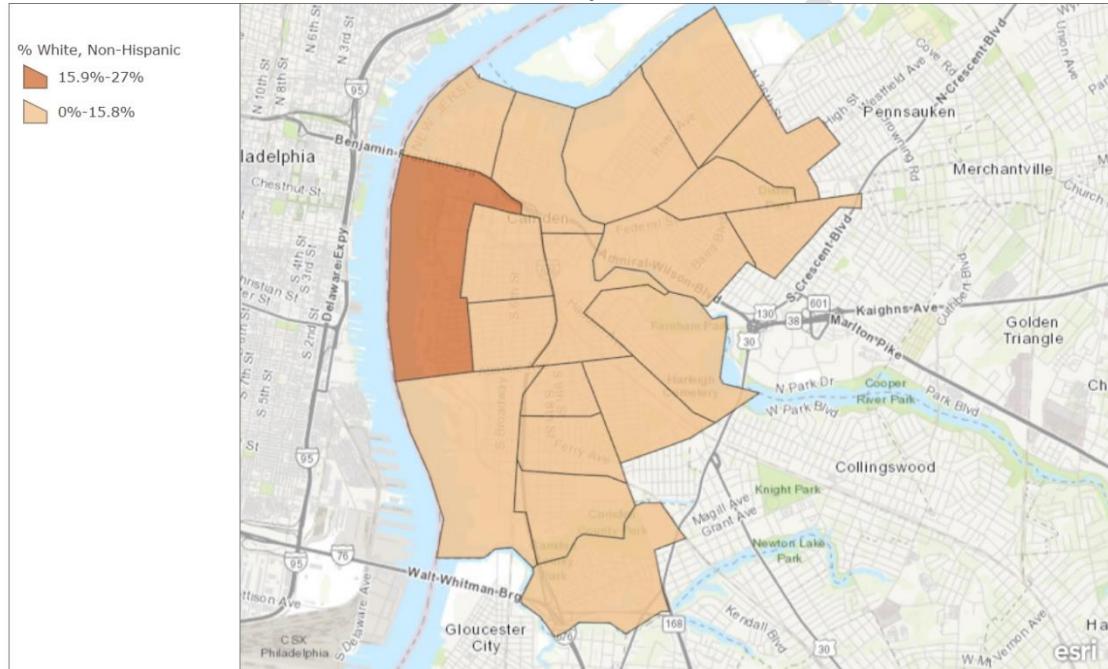
The 2014-2018 ACS determines that areas of racial concentration occur within 14 census tracts throughout the City among four (4) racial and ethnic groups. No Census Tracts have multiple racial concentrations within a one census tract. The first area of concentration is an analysis using a minority group within the City (Asian, Non-Hispanic), whereby Census Tract 6011.02 has a disproportionate number of Asian, Non-Hispanic residents, approximately 18.2% of the population in that area and well more than 10 percentage points above the City's overall percentage. This is an area of Pavonia in East Camden adjoining a part of Pennsauken Township that also has a relatively large Asian population. This area is majority Hispanic but does not have a concentration of Hispanic residents, it is adjacent to where to all areas of Hispanic concentration in Camden.

Asian, Non-Hispanic Concentration



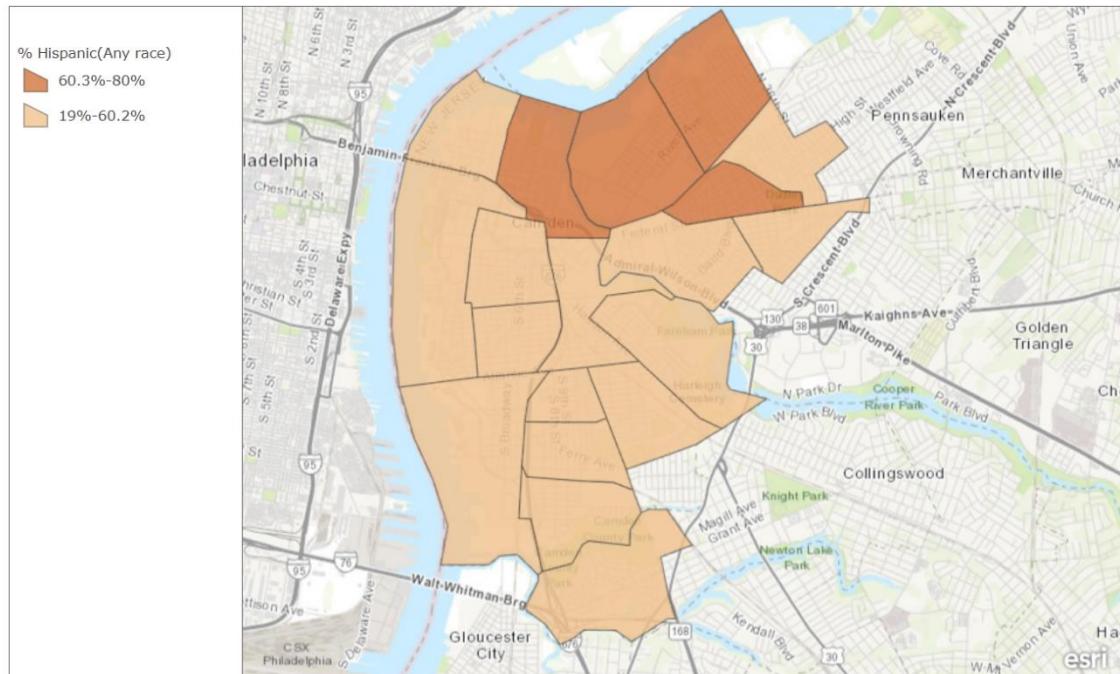
There is one area of Camden where there are a concentration of White, Non Hispanic residents, this is Census Tract 6103, which is on the Camden Waterfront. What this does show is that there is an overwhelming amount of whites living in the Central Waterfront neighborhood, an area of significant revitalization and higher incomes.

White, Non Hispanic Concentration

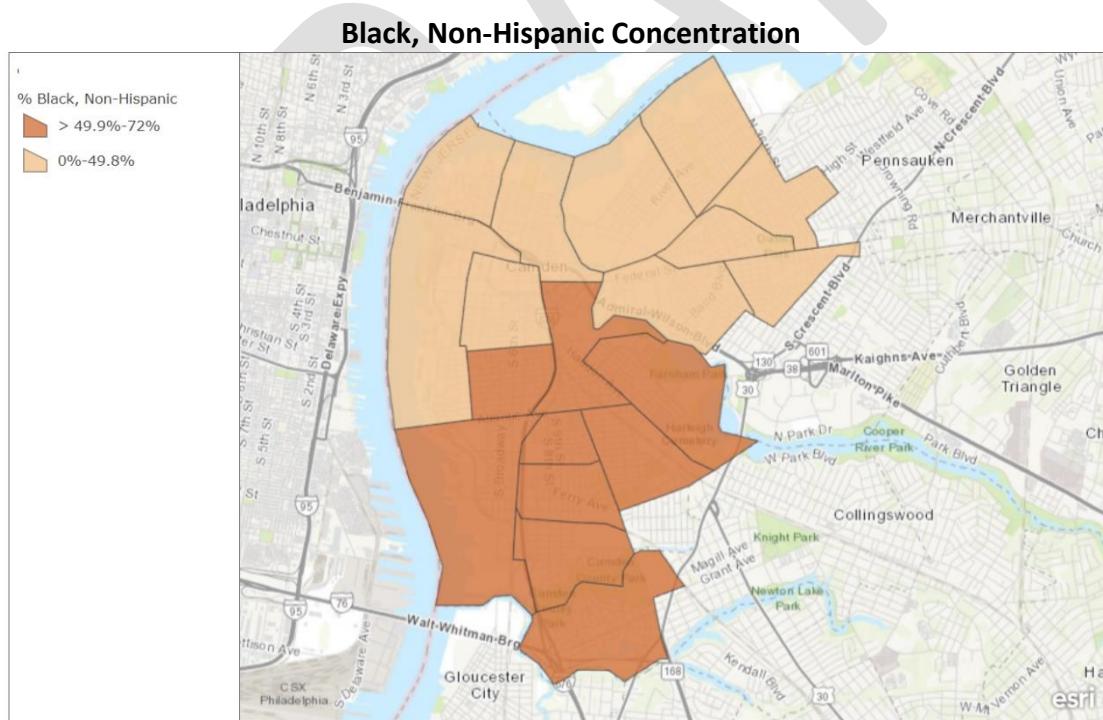


There are four census tracts with Hispanic concentration: Census Tracts 6008, 6009, 6010, and 6011.01. They are all adjacent to each other in North and East Camden in the neighborhoods of Cramer Hill and Pyne Point.

Hispanic Concentration



The race with the most Census Tracts of Racial Concentration are Black Non Hispanic for which there are eight tracts, they are : Census Tracts 6002, 6014, 6015, 6016, 6017, 6018, 6019, and 6020. These areas encompass parts of Central Camden and nearly the entire southern part of the City in neighborhoods like Parkside, Whitman Park, and Fairview.



Areas of Racial Concentration

Census Tract	Total population	% Hispanic(Any race)	% White, Non-Hispanic	% Black, Non-Hispanic	% American Indian and Alaska Native,		% Asian, Non-Hispanic	% Native Hawaiian and Other Pacific Islander, Non-Hispanic	% Some Other Race, Non-Hispanic	% Two or more races, Non-Hispanic
					Native	Non-Hispanic				
6002	1933	32.1	2.8	63.1	0	0	0	0	0	2.1
6004	2904	43.1	3.8	50	0	2.5	0	0	0	0.6
6007	1497	60.2	10.4	29.4	0	0	0	0	0	0
6008	5270	67.2	3	29.7	0	0.1	0	0	0	0
6009	4064	68.4	8.5	19.8	0	2.8	0	0	0	0.5
6010	6503	80.7	3.4	15.1	0	0.3	0	0	0	0.6
6011.01	3283	77.1	4.3	12.6	0	5.1	0	0	0.6	0.4
6011.02	5707	59.8	2.7	16.6	0	18.3	0	0	1.5	1.1
6012	6291	53.4	5.8	37.3	0	1.6	0	0	1.9	0
6013	4305	56.2	5	35.1	0	3.7	0	0	0	0
6014	4623	19.4	5.1	72.8	0.5	0	1.1	0	0	1
6015	4932	34.9	5.8	57.2	0	0	0	0	0	2.1
6016	2649	28.7	2.2	63.2	2.9	0	0	0	0	3.1
6017	3146	42.3	0.6	55.5	0	0	0	0	1	0.7
6018	1206	43.7	5	50	0	1.3	0	0	0	0
6019	2727	42.4	0.6	56.5	0.5	0	0	0	0	0
6020	6478	36.4	10.1	53.6	0	0	0	0	0	0
6103	2151	22.9	27	44.7	0	3.4	0	0	0	2
6104	4939	44.5	12.2	38	0	3	0	0	0	2.2

Source:2014-2018 American Community Survey

Ethnicity

Foreign-Born/LEP

The United States Census Bureau's American Community Survey (ACS) has two classifications of how well people speak English. These classifications include "very well" and "less than very well." For the purposes of this analysis, an "LEP Threshold Population" will be defined as any one group constituting at least 5% of the City's total population, or 1,000 people within the City (whichever is less), that speaks English "less than very well."

Language Spoken at Home by Ability to Speak English

For the Population 5 Years and Older

	Population Estimate	Percentage of Total Population
Total Population	70,011	100.00%
Speak only English	38,046	54.34%
Spanish or Spanish Creole:	29,495	42.13%
Speak English "very well"	16,538	23.62%
Speak English less than "very well"	12,957	18.51%
French (incl. Patois, Cajun):	108	0.15%
Speak English "very well"	85	0.12%

Speak English less than "very well"	23	0.03%
French Creole:	53	0.08%
Speak English "very well"	17	0.02%
Speak English less than "very well"	36	0.05%
Italian:	8	0.01%
Speak English "very well"	0	0.00%
Speak English less than "very well"	8	0.01%
German:	5	0.01%
Speak English "very well"	0	0.00%
Speak English less than "very well"	5	0.01%
Russian:	51	0.07%
Speak English "very well"	47	0.07%
Speak English less than "very well"	4	0.01%
Polish:	27	0.04%
Speak English "very well"	23	0.03%
Speak English less than "very well"	4	0.01%
Other Slavic languages:	28	0.04%
Speak English "very well"	0	0.00%
Speak English less than "very well"	28	0.04%
Persian:	25	0.04%
Speak English "very well"	25	0.04%
Speak English less than "very well"	0	0.00%
Gujarati:	147	0.21%
Speak English "very well"	95	0.14%
Speak English less than "very well"	52	0.07%
Hindi:	113	0.16%
Speak English "very well"	61	0.09%
Speak English less than "very well"	52	0.07%
Urdu:	24	0.03%
Speak English "very well"	5	0.01%
Speak English less than "very well"	19	0.03%
Other Indic languages:	52	0.07%
Speak English "very well"	52	0.07%
Speak English less than "very well"	0	0.00%
Chinese:	58	0.08%

Speak English "very well"	19	0.03%
Speak English less than "very well"	39	0.06%
Korean:		
Speak English "very well"	10	0.01%
Speak English less than "very well"	118	0.17%
Mon-Khmer, Cambodian:		
Speak English "very well"	49	0.07%
Speak English less than "very well"	140	0.20%
Vietnamese:		
Speak English "very well"	230	0.33%
Speak English less than "very well"	761	1.09%
Other Asian languages:		
Speak English "very well"	33	0.05%
Speak English less than "very well"	123	0.18%
Tagalog:		
Speak English "very well"	66	0.09%
Speak English less than "very well"	7	0.01%
Other Pacific Island languages:		
Speak English "very well"	0	0.00%
Speak English less than "very well"	18	0.03%
Arabic:		
Speak English "very well"	118	0.17%
Speak English less than "very well"	0	0.00%
African languages:		
Speak English "very well"	79	0.11%
Speak English less than "very well"	19	0.03%
Other and unspecified languages:		
Speak English "very well"	0	0.00%
Speak English less than "very well"	0	0.00%

Source: 2011-2015 American Community Survey 5-Year Estimates

As indicated above, the data suggests that slightly more than half (54.34%) of the City's population "Speak Only English," where 45.66% of the population speaks languages other than English. Of these other languages spoken at home, only Spanish-speaking households represent more than 5% of the City's total population and have a population of more than 1,000 persons within Camden City. Overwhelmingly, 42.13% of speak Spanish – of which 23.62% speak English "very well" but 18.51% speak English less than "very well".

As a reference, the most prominent languages present within the City include Spanish or Spanish Creole (42.13%);

Vietnamese (1.42%); Mon-Khmer - Cambodian (0.27%); Other Asian Languages (0.22%); Gujarati (0.21%); and Korean (0.18%). As shown, all other LEP population counts are de minimis to all Spanish speaking households and do not trigger LEP or LAP requirements per HUD guidance.

Of the households that speak these various languages, there are only one (1) language groups that constitute a population greater than 5% or 1,000 persons as part of the total City population and speak English "less than very well." This includes: Spanish or Spanish Creole (12,957 persons). Overall, these LEP households make up 18.51% of the overall population in Camden City.

Language Spoken at Home by Ability to Speak English Less Than Very Well Greater Than 5% or 1,000 Persons		
	Population Estimate	Percentage of Total Population
Total Population	70,011	100.00%
Speak only English	38,046	54.34%
Spanish or Spanish Creole:	29,495	42.13%
Speak English "very well"	16,538	23.62%
Speak English less than "very well"	12,957	18.51%

Source: 2011-2015 American Community Survey 5-Year Estimates

Camden City utilized the United States ACS 5-Year Estimate, Table B16001: **Language Spoken at Home and Ability to Speak English for Population 5 Years and Over**. Based on HUD's definition of LEP Threshold Population, there is only one (1) language group with a population greater than 5% of the total City population or 1,000 persons that "speaks English less than very well" – which are Spanish or Spanish Creole speaking households.

Age

The table below shows the age cohort of the City population. Overall, the City has a very young population, as compared to the State and the Nation. The working age cohort (20 to 64) ratio is much lower than the state or national percentage. The percentage of elderly (65+) and extra elderly (75+) are also much lower than the national and state percentages.

Age Cohorts [†]				
	Camden City #	Camden City %	NJ%	US%
Under 5	6,757	8.9%	5.9%	6.2%
5 to 19	19,020	25.2%	18.9%	19.4%
20 to 64	42,274	57.1%	66.5%	59.5%
65 to 74	4,409	5.8%	8.4%	8.5%
75 & over	2,490	3.3%	6.7%	6.3%
Median Age	29.9		40.2	37.8

[†] 2013-2017 ACS 5-Year Estimates

Religion

Household Data

Income and Poverty

The following depicts information on income data for the City's population. Household incomes in Camden declined considerably since 1970 in relation to incomes in the suburban region/county located around the City. The median household income in 2000 was \$23,421.00 as compared to \$48,097 for the County. Job losses caused by structural changes in the economy have contributed to both a lower family income as well as a steadily increasing poverty rate in the City. As more middle-income households moved out of Camden, impoverished residents became increasingly concentrated in the City. However, the City is experiencing a "renaissance" currently and there is hope that with new business activity and the relocating and expansions of many businesses within the City will lead to increases in employment and income for the residents

In 2000 about 35.52% or about one out of every three of City residents had incomes below the federally defined poverty line. The corresponding County's average rate including Camden for the same period was 10.4%, of which over half of those in poverty in the County lived in Camden therefore indicating a much lower poverty rate. Among the State's largest Cities, Camden had one of the highest proportion of its residents living below the poverty line. In 2000, Camden's per capita income was \$9,815.00, which was slightly more than a third of the State's per capita income level and less than half of the Nation's rate.

Income figures from the U.S Census Bureau show that the City is struggling to keep up with State and National income levels, even though the remainder of New Jersey has one of the highest income levels in the country.

According to U.S. Census data, median household income was well below that of the State and the Nation. While relative increases closely resemble State and National trends, the overall medians are still well below the comparative analysis of the State and Nation. Similarly, median household income is far below those of the State and National medians; however, relative increases, again, closely resemble State and National trends. Though as is seen below, there instances where Median Household Income declined and where Median Family Income in Camden lagged far behind the state and country.

In 2010, the Median Household Income was \$27,027 .00 in Camden, compared to \$69,811 in New Jersey and \$51,914.00 for all U.S. households. In 2017 the Median Household Income was \$26,105. From 2010 to 2017 Median household income decreased in Camden by -3.41%, while it increased by 9.55% in New Jersey and 11.05% nationwide.

Median Family Income in Camden in 2017 was \$30,521, a 24% increase from 2000. In New Jersey there was 44.3% increase from 2000 to 2017 in MFI, and in the US there was a 41.57% increase in MFI from 2000 to 2017.

Current per capita income is \$14,405 in Camden, compared to the U.S. per capita income of \$31,177. In 2010, the per capita income was \$12,807 compared to \$9,815 in 2000 , indicating a 46.76% increase from 2000 to 2017. In the U.S during the same period per capita income increased by 44.42%, in New Jersey it increased by 44.67%.

Comparative Growth in Income			
	Camden City	NJ	US
2000 Median Household Income[†]	\$ 23,421.00	\$ 55,146.00	\$ 41,994.00
2010 Median Household Income[†]	\$ 27,027.00	\$ 69,811.00	\$ 51,914.00
2017 Median Household Income[‡]	\$ 26,105.00	\$ 76,475.00	\$ 57,652.00
2000 Per Capita Income[†]	\$ 9,815.00	\$ 27,006.00	\$ 21,587.00
2010 Per Capita Income[†]	\$ 12,807.00	\$ 34,858.00	\$ 27,334.00
2017 Per Capita Income[‡]	\$ 14,405.00	\$ 39,069.00	\$ 31,177.00
2000 Median Family Income[†]	\$ 24,612.00	\$ 65,370.00	\$ 50,046.00
2010 Median Family Income[†]	\$ 29,118.00	\$ 84,904.00	\$ 62,982.00
2017 Median Family Income[‡]	\$ 30,521.00	\$ 94,337.00	\$ 70,850.00
[†] 2000 Census & 2006-2010 American Community Survey			
[‡] 2013-2017 ACS 5-Year Estimates			

Furthermore, as of 2017 the percentage of households in the lowest income ranges is significantly higher than for other jurisdictions:

- **City of Camden:** Household Income < \$25,000.00 = 48.7%
- **New Jersey:** Household Income < \$25,000.00 = 16.5%
- **United States:** Household Income < \$25,000.00 = 21.4%

As of the 2013-2017 American Community Survey, 37.4% of Camden's population were living below poverty. Additionally, 35.2% of all families were living in poverty. These figures don't indicate drastic shifts since the 2000 Census but they do show that concentrations of poverty are still increasing as in 2000, 35.52% of all people and 34.74% of all families in Camden were living below poverty. A "concentration of poverty" is when 40 percent or more of the population of an area lives below the poverty line. As of the 2014-2018 American Community Survey, in Camden there are eight census tracts that are concentrations of poverty, out of 19 census tracts in the City. The areas are spread throughout the City, in East and North Camden, as well as Downtown, Whitman Park, and Morgan Village.

Employment Data

Historically, jobs in Camden peaked in the 1950s and then declined steadily through 1990. This is related to the manufacturing and shipbuilding sectors closing or leaving the City and the economic recessions that occurred over this period. Only one-half of the manufacturing firms that were operating during the 1970s remained active in the City in 1990. Manufacturing jobs fell from almost 12,000 positions to 5,300 positions over the last two (2) decades. Estimates available indicate that manufacturing jobs in 1996 were at 5,000 positions. New service sector jobs have replaced lost manufacturing jobs, but not to the levels of the total job base in the 1970s. Many of the new service sector jobs fail to match the wages offered by the former manufacturing jobs.

In 1992, more people worked in service sector employment in the City than had worked in manufacturing jobs 20 years ago. While manufacturing jobs have declined, there is still a core base of manufacturing establishments in the City that offer potential for facility expansion and modest job growth.

The City's strongest and growing sectors for job growth are in the healthcare services sector . New Jersey Department of Labor employment projections from the year 2016 to 2026 indicated that healthcare services occupations are expected to reflect 37.43% of the new jobs projected 7.45% in job growth in Camden County. The Delaware Valley Regional Planning Commission projects a 10.07% increase in jobs from 2015 to 2045, projecting 45,992 jobs in just the City in 2045, from 41,786 in 2015.

There are several corporate headquarters within Camden including Campbells Soup and Subaru of America. Subaru of America is one of the many businesses that have relocated to Camden within the past five years due to tax credit programs incentivizing relocation within the City. Most of the incentives have come with a pledge to prioritizing the hiring of Camden residents and offering them job training or apprenticeships.

Still in 2017, there were 32,033 non federal jobs in Camden, but only 24,766 non federal workers living in Camden according to the U.S Census Bureau. According to the 2013-2017 ACS 30,669 residents of Camden were in the Labor Force with a 14% unemployment rate.

According to 2018 estimates from the New Jersey Department of Labor and Workforce Development (NJLWD), Division of Planning Analysis, the City's unemployment rate was 8.9% – which was the 10th highest unemployment rate in the State and the highest unemployment rate amongst municipalities and counties with populations over 25,000 persons. Nonetheless, this represents a vast improvement since 2009, when the City's unemployment rate was 17.8%.

2018 NJ Annual Average Labor Force Estimates by Municipality (2018 Benchmark)				
Name/County/Municipality	Labor Force	Employment	Unemployment	Unemployment Rate
Camden County, NJ	249,945	238,357	11,588	4.6
Camden city, NJ	25,349	23,096	2,253	8.9

NOTE: BLS areas (with 25,000 + population) are based on claims share. All others use census share.

INDUSTRY [†]				
	Estimate	Margin of Error	Percent	Margin of Error
Civilian employed population 16 years and	26,362	+/-944	26,362	(X)
Agriculture, forestry, fishing and hunting, and mining	87	+/-100	0.3%	+/-0.4
Construction	1,235	+/-299	4.7%	+/-1.1
Manufacturing	2,552	+/-448	9.7%	+/-1.7
Wholesale trade	903	+/-233	3.4%	+/-0.9
Retail trade	3,619	+/-500	13.7%	+/-1.8
Transportation and warehousing, and utilities	1,883	+/-447	7.1%	+/-1.7
Information	225	+/-152	0.9%	+/-0.6
Finance and insurance, and real estate and rental and leasing	867	+/-243	3.3%	+/-0.9
Professional, scientific, and management, and administrative and waste management	2,396	+/-357	9.1%	+/-1.4
Educational services, and health care and social assistance	7,758	+/-662	29.4%	+/-2.3
Arts, entertainment, and recreation, and accommodation, and food services	2,814	+/-429	10.7%	+/-1.6
Other services, except public administration	1,134	+/-319	4.3%	+/-1.2
Public administration	889	+/-237	3.4%	+/-0.9

[†] 2013-2017 ACS 5-Year Estimates

According to the U.S. Census 2013-2017 ACS 5-Year ACS, Educational Services, Health Care and Social Assistance industries make up nearly 30% of the City's total industry. Retail Trade is also a significant industry sector (13.7%), as well as Manufacturing (9.7%).

Most recent Census data reflects that 59.2% percent of the market area population drove alone to work, and 1.8% worked at home. The average travel time to work is currently 24.1 minutes in the market area, compared to the U.S. average of 25.5 minutes. According to the U.S. Census 2013-2017 ACS 5-Year Estimates, the mean travel time to work was declined by approximately 2 minutes to 24.1 minutes. What is most notable about the City's commuting patterns is the high set-aside of carpooling, public transit and walking. Compared to New Jersey, these rates are approximately 9.5%, 2.2% and 2.7% higher than State rates, respectively. These numbers are indicative of a population that lives without owning a vehicle and reliant on use of public transit – consistent with rates where more impoverished populations spend more money on transportation costs than higher income households.

Commuting to Work [†]				
	Estimate	Margin of Error	Percent	Margin of Error
Workers 16 years and over	25,478	+/-911	25,478	(X)
Car, truck, or van – drove alone	15,085	+/-1,001	59.2%	+/-2.8
Car, truck, or van – carpooled	4,452	+/-671	17.5%	+/-2.6
Public transportation (excluding taxicab)	3,486	+/-469	13.7%	+/-1.9
Walked	1,458	+/-304	5.7%	+/-1.2
Other means	537	+/-216	2.1%	+/-0.8
Worked at home	460	+/-168	1.8%	+/-0.7
Mean travel time to work (minutes)	24.1	+/-1.0	(X)	(X)

[†] 2013-2017 ACS 5-Year Estimates

Education

The table below shows the educational attainment of the City population. Despite the high level of poverty plaguing the City, educational attainment levels for populations 25 have improved since the last Consolidated Plan, and the percentage of persons with a high school diploma is now ten (10) percentage points higher than that of New Jersey and the Nation. Higher level education continues to lag behind State and National trends.

Educational Attainment (Population 25 and Over) [†]				
	Camden City #	Camden City %	NJ%	US%
Population 25 and Over	43,554	100.0%	-	-
<9th Grade	5,973	13.7%	5.1%	5.4%
9th to 12th Grade, no diploma	7,889	18.1%	5.7%	7.2%
HS Graduate	16,154	37.1%	27.9%	27.3%
Some College, no Degree	8,024	18.4%	16.6%	20.8%
Associate Degree	1,897	4.4%	6.5%	8.3%
Bachelor's Degree	2,622	6.0%	23.4%	19.1%
Grad. Or Prof. Degree	995	2.3%	14.7%	11.8%

Percent high school graduate or higher	68.2%	89.2%	87.3%
Percent bachelor's degree or higher	8.3%	38.1%	30.9%

[†] 2013-2017 ACS 5-Year Estimates

According to the 2013-2017 ACS, the educational attainment of the population aged 25 years or older in the City was distributed as follows:

- 31.8% had not earned a high school diploma (12.6% in the U.S.)
- 37.1% were high school graduates (27.3% in the U.S.)
- 4.4% had completed an Associate degree (8.3% in the U.S.)

- 6.0% had a Bachelor's degree (19.1% in the U.S.)
- 2.3% had earned a Master's/Professional/Doctorate Degree (11.8% in the U.S.)

Interestingly enough, median earnings for those without a high school degree, with a high school degree, some college or associate's degrees and bachelor's degrees were very similar in earnings. Significant increases in median earnings occur only when an individual has a graduate or professional degree.

Housing Profile

The U.S. Department of Housing and Urban Development (HUD) has identified four income classifications as target groups for Federal assistance resources. These include:

- **Extremely Low-Income households:** those earning less than 30% of median family income (MFI);
- **Low-income households:** those earning between 31 and 50% of MFI;
- **Moderate-income households:** those earning between 51 and 80% of MFI; and
- **Middle-income households:** those earning between 81 and 100% of MFI.

Updated **State of the Cities Data Systems (SOCDS): Comprehensive Housing Affordability Strategy (CHAS) Data** (2012-2016 ACS) indicates that there are 24,775 households within the City's limits. CHAS data indicates that the City experienced a 510 household decline since 2010. The CHAS data shows that households making more than 80% of the HUD Area Family Median Income declined by -21.74% from 2010 to 2016, while households making less than 30% HAMFI increased by 12.7%.

The distribution of household income in Camden is such that about 62.1 percent of all households may be categorized as at below moderate-income status and therefore eligible for some form of Federal, State or municipal government assistance. 62.1 percent represents a 5.5 percentage point increase in those households falling below moderate-income status since 2010— an indication that housing conditions and income-stats within the City have not improved. This indicates that a majority of the City's households are in the two lowest-income categories – extremely low- and low-income groups. Per the 2006-2010 CHAS data, 9,415 (or 37.2 percent) and 5,145 (or 20.4 percent) were identified as either Extremely Low- or Low-Income population groups, respectively.

In relative backing up of most recent CHAS data(2012-2016), the 2014-2018 American Community Survey (ACS), as provided by the U.S. Census, depicts similar amount of households within Camden. Specifically, Census data provides that of the 29,938 existing housing units, with 24,727 being occupied, though still an overwhelming 17.41 percent (5,211 housing units) of these units are vacant, nearly double the percentage of vacant units in the County, for which Camden has 27.6% of all vacant units in the County. While in their present state, vacant properties represent a serious problem, they also offer valuable opportunities for reuse and redevelopment. The enactment of New Jersey's Abandoned Properties Rehabilitation Act has significantly enhanced those opportunities by providing legal tools to address abandoned properties, which are a priority for the City of Camden.

By current definitions, affordable housing is that which costs no more than 30 percent of the gross income of the household that occupies it. According to HUD, Households experiencing housing costs that exceed 30 percent of gross income are categorized as having a Housing Cost Burden, whereas households with

housing costs exceeding 50 percent of gross income are categorized as having a Severe Cost Burden. Approximately, 35.4 percent (5,400) of all renter-occupied households and 19.5 percent (1,860) of owner-occupied households are experiencing Severe Cost Burdens.

General Housing Cost Burdens (greater than 30.0 percent) are significant within the City's renter-occupied households with 55.4% of them having a cost burden and overall (47.9 percent), where all types of households share a similar burden, at least percentage wise.

A household is considered to have a housing problem if it is experiencing any of the following conditions:

- Physical defect (incomplete kitchen facilities);
- Physical defect (incomplete plumbing facilities);
- Overcrowding (more than one (1) persons per room); and/or
- Housing cost burden or severe housing cost burden.

CHAS data indicates that an overwhelming 60.1 percent of renters experience one of the abovementioned housing problems. Approximately, 37.8 percent of owner-occupied households experience at least one housing problem. Overall, 51.5 of all occupied households experience one or more housing problems – a clear indication that much of the City's housing is in desperate need of rehabilitation. Not surprisingly, a majority of these households make below 50% HAMFI – for both renter-occupied(90.3% of renters with housing problems) and owner-occupied households(76.1% of owners with housing problems).

As a point of reference, Consolidated Plans contain an analysis of housing problems that affect income and tenancy groups, as well as the following household categories delineated within the U.S. Census. These groups include:

- Elderly – People aged 62 and up. Individuals age 75 and up are generally recognized as a population with different needs than those 62-74, so the CHAS data separates these groups. "Elderly" refers to individuals 62-74, while those 75 and up may be referred to as "extra elderly" or "frail elderly"
- Small related households of two to four persons;
- Large related households of five or more persons; and
- All Other households, including single, non-elderly persons and households with two or more non-related persons.

According to the 2012-2016 CHAS data, 38.5 percent of all Camden households and 32.8 percent of the City's low- and moderate-income households lived in owner-occupied dwellings. Compared to the 2006-2010 CHAS when 41.7 percent of households were owners and 34.2 percent of low and moderate income households lived in owner-occupied dwellings. As the CHAS shows overall rates of owner are decreasing across all incomes levels including those that are low and moderate income. This continues to present a substantial maintenance and neighborhood stabilization needs, which should be focused on the City's significantly older housing stock. CHAS data also depicts that of the 9,530 owner-occupied households, 35.8 percent had either a cost burden or severe cost burden, a decrease from 2010 when 38% of owner households were cost burdened or severely cost burdened..

2014-2018 ACS data indicates additional stresses on the City's owner-occupied market. Where this data reports population and household loss, in comparison to CHAS data, it depicts a slight decline in homeownership. The ACS states that 39.03 percent of the City's housing units are owner-occupied, down

from 45.99% in 2000.

Since 2000, the City has experienced a 6.6% decline in population according to the 2000 Census and 2014-2018 American Community Survey. Much if not all of this population decline occurred in the City's Black Non Hispanic population (33.7 percent decline), the City also experienced a decline within the White, Non Hispanic population (28 percent decline). The City also experienced a significant growth amongst Latino populations (20.9 percent increase) a continuation of a similar trend and demographic shift that started in the 1990s. As of 2018 Camden is now a majority Hispanic City, while in 2000 the Black Non Hispanic population had the largest population, with a plurality of 49.8%, today the Black, Non Hispanic population is 39.9% of the population.

While housing costs in Camden are significantly lower than in many other U.S. cities, homeownership is beyond the reach of many lower-income African-American or Hispanic families in the City and many such families have significant financial difficulty in maintaining the homes they own and occupy. Even for those that may be able to purchase a home, with or without the assistance of leveraged homeownership programs, many lending institutions have become more stringent in terms of their lending practices; thus making it more difficult for these populations to obtain a mortgage and invest in homeownership opportunities.

According to the 2014-2018 ACS, 60.97 percent of all Camden City households lived in rental housing, compared with 60.85 percent in 2010 and 50.01 percent in 2000. On average, renters have lower incomes than homeowners. Also, renters are more likely to live in housing that is unaffordable. This is becoming an issue for the City's residents as renter-occupied housing numbers continue to swell. According to the 2016 CHAS data, a substantial percentage of renters, as compared to homeowners, experienced cost burdens (55.4 percent of renters, as compared with 35.78 percent for homeowners). Similarly, renters were twice as likely to experience severe cost burdens as homeowners (35.4 percent for renters, as compared to 19.5 percent for homeowners).

Although Camden's housing stock is priced at levels lower than that in many other U.S. cities, a large portion of low- and moderate-income households in the City experience housing cost burdens with the lowest-income households facing the greatest affordability problems. Market-rate housing in Camden is unaffordable for virtually all extremely low-income households and for a significant number of low-income households.

Extremely Low Income (Below 30% MFI)

According to the 2006-2010 CHAS, approximately 37.24 percent of all Camden households were considered Extremely Low-income. 2006-2010 ACS data indicates that the City's MFI was considered to be \$29,118. Accordingly, an Extremely Low-income household would typically earn up to \$8,735 annually and would tend to experience the most distressed housing conditions. In the most recent CHAS 2012-2016, 42.8% of Households were Extremely Low Income and based on the 2012-2016 ACS Median Family Income of \$30,101, would make no more than \$9,030 a year, indicating that more households are falling into this distinction in Camden.

As of the 2006-2010 CHAS 80.14 percent of all Extremely Low-income households had at least one housing problem, as of 2012-2016, 77.05% of Extremely Low-Income Households had at least one housing problem indicating a decline but a slight one at that. The incident of housing problems does not decline substantially for homeowners relative to renters, as is the case with other income groups.

Overall, about 61.03 percent of Extremely Low-income renter households are experiencing a severe housing cost burden and 79.6 percent are encountering at least one housing problem, such as substandard conditions or overcrowding. On the contrary, 2013-2017 ACS data reports that there are only 266 households living in units that are considered substandard and 1,327 households that are experiencing overcrowding. It is unlikely that this data is accurately reflecting on-the-ground conditions, as it is known that much of the City's housing stock is obsolete and in desperate need of rehabilitation and/or demolition.

According to the 2011-2015 CHAS, Small Related households dominate Extremely Low-income category. This suggests an anomalous shift from Elderly households normally dominating this stratum to Small Family households becoming prevailing significantly. The CHAS provides that only 24.8 percent (2,720) of Elderly -households make up the Extremely Low-Income stratum; whereas 38.96 percent (4,270) of Small Family households make up the Extremely Low-Income stratum. Of all Extremely Low Households, 79.6% of them have at least one housing problem, 79.5% of renters and 79.6% of owners have at least one housing problem.

Overall, 78.8 percent of owner households in this income group have a housing cost burden greater than 30.0 percent, compared with 76.9 percent of renter households. Extremely Low-income owners are slightly less likely to have a severe housing cost burden as renters: 59.5 percent of owner households have severe cost burdens compared with about 62.8 percent of renter households.

Low Income (Greater than 30% and less than 50% MFI)

According to the 2006-2010 CHAS, about 20.35 percent of Camden's households can be categorized as Low-Income. 2006-2010 ACS data indicates that the City's MFI was considered to be \$29,118. Accordingly, a Low-income household would typically earn up to \$14,559 annually. In the most recent CHAS 2012-2016, 19.29% of Households were Low Income and based on the 2012-2016 ACS Median Family Income of \$30,101, would make no more than \$15,051 a year, showing a minimal increase in income and a slight decrease in percentage of low income households, though based on the data households were more likely to go down in household income level than to go up. The 2006-2010 CHAS showed that 71.5 percent of Low Income household have at least one housing problem, the 2012-2016 CHAS Data indicates that 59.4 percent of all Low-Income households have at least one housing problem.

Low-income homeowners have significantly lower rates of housing problems (43.8 percent compared with 68.3 percent for renters) and similarly lower cost burdens (40.92 percent compared with 66.6 percent for renters). However, as cost burdens become more severe, owner-occupied households tend to be adversely affected (19.5 percent for owner-occupied households compared with 14.94 percent for renters). This is most likely a reflection of increased mortgage costs, taxes and insurance for homeowners, whereas these factors don't necessarily or largely affect renters.

Many Low-income households pay housing costs that exceed the 30-percent affordability threshold. According to the 2011-2015 CHAS Elderly owners of low-income are at a substantially greater disadvantage, based on a percentage, than Elderly renters. Raw numbers show that there are approximately 245 Elderly Low-Income owner-occupied households that had a cost burden and 235 Elderly Low-Income renter-occupied households with a cost burden. Though of those cost burdened 63.26% of Elderly Low-Income owners were severely cost burdened, while just 21.28% of those Elderly Low-Income renters that were cost-burdened were severely cost burdened.

According to the 2011-2015 CHAS, while 28.7 percent of all Low-income households are Elderly, an overwhelming 53.56 percent of all Low-Income households are Small Related households. Approximately, 52.85 percent of all owner-occupied households report having housing problems, representing a slight decrease from the 2006-2010 CHAS when 57.2 percent of Low-Income owner-occupied households reporting a housing problem. Many of these housing units are deteriorated; however, these units are not counted in the census as substandard because they do not lack complete kitchens or bathrooms.

Moderate Income (Greater than 50% and less than 80% MFI)

According to the 2012-2016 CHAS, Moderate-Income households earning between \$15,051.00 and \$24,081, and are far less likely to experience housing problems than are the owner and renter households in the extremely low- and low-income categories. Only 29.19 percent of all Moderate-income households reported having a housing problem (30.22% of renters, and 29.15% of owners) according to 2012-2016 CHAS data, with 22.12 percent reporting a cost burden and 2.96 percent reporting a severe cost burden. Moderate Income Homeowners have slightly higher rates of cost burden versus moderate income renters, with 26.08% of homeowners having cost burdened compared to 18.1% of renters. In the 2011-2015 CHAS among Moderate-income Elderly households, the difference between renters and homeowners is more pronounced, with just 8 elderly moderate income renters reporting cost burden compared to 180 elderly moderate income owners.

According to the 2011-2015 CHAS, Small Related households represent the largest faction with cost burden in Moderate-Income households. Twenty eight point eighty-eight percent (28.88%) of Small Related Moderate-Income households report housing cost burden, whereas 10.9 percent of Large Related households in this income stratum report cost burden. Just 18.25% of elderly, moderate-income households have cost burden this may be due to the possibility that many Elderly homeowners have already retired their mortgage and therefore, have lower monthly housing expenses. However, Elderly households in this category may have difficulty keeping their homes in proper repair due to their generally fixed incomes and their inability to assume debt needed to finance repairs. Notwithstanding the lower-reported incidence of housing problems, deteriorated conditions may be more prevalent in the households of Elderly homeowners, than is indicated by the data. The City should continue to pursue an aggressive rehabilitation program for Elderly owner-occupied households to ensure neighborhood stability and avoid vacancies, which would lead to further decline of the City's housing stock and neighborhoods.

Moderate-income owners and renters can be affected by the presence of incipient blight in their communities. The deterioration of occupied housing and the emergence of vacant houses in neighborhoods that have been relatively stable may influence Moderate-Income households to seek housing elsewhere. This seems to be a standing trend within the City within the last thirty (30) years, which may or may not have been exacerbated by the subprime mortgage lending and foreclosure crisis. While geographic shift was largely prominent between 1990 and 2000, these trends seemed to have continued due to the aforementioned predicaments. The City's historical reluctance to make use of New Jersey's Abandoned Properties Rehabilitation Act and to aggressively pursue redevelopment opportunities no longer is the case thus providing opportunities to revitalize residential properties and neighborhoods.

Middle Income (Greater than 80% and less than 100% MFI)

In the Middle-Income group, which as of the 2012-2016 ACS currently has annual incomes of between \$24081 and \$30,101.00, renter households are slightly more likely to experience housing problems over owner-occupied households (6.06 percent and 5.24 percent respectively). Affordability and housing cost burdens do not seem to be a problem for many middle income households, which depicts a shift from past CHAS data. Overall, the majority of Middle-income households is able to avoid experiencing housing problems and even cost burdens. This finding suggests that, Middle-income households are capable of locating decent and affordable housing in the Camden housing market area.

Overall, affordability is a problem for a smaller segment of Middle-income homeowners, and severe affordability problems are non-existent, with no reported incidence of severe cost burdens across all middle-income households.

Middle-income households (including those over 95 percent of AMI) may also face limited housing options, including the lack of new construction and single-family houses with modern design and amenities. Since these households have more economic options, many may choose to live in the suburbs rather than remain in Camden. Other external factors, such as educational affluence, safety and neighborhood amenities, such as recreation, retail availability and entertainment also affect where middle-income populations locate. One of the goals of the City's recovery plan is to increase the range of housing options available to all income groups and all applicable attractive/essential amenities that serve these neighborhoods, especially Middle-income residents.

Although renters and homeowners in each income category have unique housing needs, these needs can be collapsed into two income strata, with Extremely Low- and Low-Income groups comprising the lower stratum and Moderate- and Middle-Income groups comprising the upper stratum.

Extremely low- and Low-Income renter households exhibit the most severe need of any income/tenure classification. According to the 2012-2016 CHAS, of these 11,090 households within the lower stratum, about 8,010 have a cost burden and 5,365 a severe cost burden. Overwhelming, more than 72.22 percent of these households have a cost burden. These households also lack the income necessary to leave their current housing situation to find more affordable, decent housing elsewhere. Without some form of rental assistance, most of these households are likely to remain living in inadequate housing conditions. Resources such as public housing, rental vouchers and certificates, and other assisted housing units are critical to meeting the housing needs of these families. However, an aggressive rehabilitation strategy can easily lower significant cost burdens associated with needed repairs and substandard conditions.

The lower homeowner stratum is composed primarily of Elderly and single-parent families (Small Related). In addition to having a significant incidence of affordability problems, these homeowners have the added burden of maintenance expenses associated with an aging housing stock. Of the 4,300 owners in the lower stratum, 2,745 (63.84 percent) have at least one housing problem and 1,765 (41.05 percent) have a severe cost burden.

Moderate and Middle Income households exhibit less severe housing needs in terms or problems and affordability. According to the 2012-2016 CHAS, of these 6,025 households within the upper stratum, about 1,020 have a cost burden and 130 a severe cost burden. Just 16.92 percent of these households have a cost burden. Of the 3,300 owners in the upper stratum, 675 (20.45 percent) have at least one housing problem and 95 (2.88 percent) have a severe cost burden. Of the 2,725 renter households in the

upper stratum, 695 (25.5 percent) have at least one housing problem and 35 (1.3 percent) have a severe cost burden.

On average, Moderate- and Middle-Income homeowners have a significantly lower incidence of affordability and other housing problems. However, many of these homeowners, especially Elderly homeowners, may have difficulty keeping pace with repair and maintenance needs. Census data does not provide a means of estimating this need. Targeted support for Moderate-Income neighborhoods experiencing incipient blight can help stabilize these communities and encourage more Moderate- and Middle-Income families to stay in or move to Camden.

The most significant housing problems in Camden are those that affect households in the lower income stratum. Extremely Low- and Low-Income households are in the most immediate need of rental assistance and housing repair assistance. Typically these households lack the income needed to buy or rent housing that is well located and not in deteriorated or substandard conditions. Households in the upper-income strata have more limited, specific needs associates with their household type. Communities where Moderate- to Middle-Income households live are in need of investment to stop incipient blight and outward migration to the suburbs. Elderly households have affordability problems as well as supportive service needs and needs for cohousing adaptations. Based on this information, Camden needs to continue its support of a range of housing production, housing preservation and service activities and enhanced amenities to address the diverse needs of the City's population.

Overcrowding

Overcrowding is defined as a household having more than 1.01 persons per room.

An analysis of 2013-2017 ACS data, as provided by the U.S. Census Bureau, on overcrowding throughout the City revealed that overall 5.2% of the City's occupied households were living in overcrowded conditions. This represents 1,320 housing units. Of these 1,333 units, 940 (3.7%) of these units experienced overcrowding at 1.01 to 1.50 occupants per room, while 387 units (1.5%) experienced overcrowding at 1.51+ occupants per room (otherwise known as Severe Overcrowding). Additionally, overcrowding is much more likely to occur within renter-occupied households versus owner-occupied households.

Occupants Per Room By Tenure [†]		
	Estimate	Percent
Total:	25,195	100.0%
Owner occupied:	9,877	39.2%
0.50 or less	6,940	27.5%
0.51 to 1.00	2,573	10.2%
1.01 to 1.50	311	1.2%
1.51 to 2.00	7	0.0%
2.01 or more	46	0.2%
Renter occupied:	15,318	60.8%
0.50 or less	8,227	32.7%
0.51 to 1.00	6,128	24.3%
1.01 to 1.50	629	2.5%
1.51 to 2.00	223	0.9%
2.01 or more	111	0.4%

[†] 2013-2017 ACS 5-Year Estimates

However, these figures should be taken as only a rough indicator of the scope of the overcrowding problem. Because of high rents and low incomes, some households may have two (2) or three (3) families living in one (1) apartment unit. Fearing eviction or difficulty with the law, many families do not report overcrowding, and indeed may encourage it to lessen the cost burden on individual families. Thus, overcrowding may be more common than the figures alone would indicate.

Substandard Housing

The City definition of substandard housing is a housing unit with one or more serious code violations. For the purposes of this analysis the City will also use the lack of a complete plumbing or a complete kitchen as an indicator of substandard housing, as provided by the 2013-2017 ACS data and comparative to 2011.

Substandard Units [†]		
	Estimate	Percent
Occupied housing units	25,195	25,195
Lacking complete plumbing facilities	105	0.42%
Lacking complete kitchen facilities	161	0.64%
No telephone service available	1,307	5.19%

[†] 2013-2017 ACS 5-Year Estimates

The latest 2013-2017 ACS data reported that there were 105 housing units within the City that lacked complete plumbing and 161 units that lacked a complete kitchen. Assuming that these units do not overlap, there were 166 substandard units within the City, by this definition. This represents approximately 1% of the occupied housing units within the City. These numbers employ a major statistical significance from those occupied households reporting the same characteristics in 2011. Where in 2011, 728 housing units lacked complete plumbing and 954 units lacked a complete kitchen. This may very much correlate to the City's aggressive approach to demolish nearly 700 abandoned, unsafe and blighted structures and success of the City's housing rehabilitation program. This does not dismiss, however, that code compliance and age of the City's housing stock still provides a housing stock that could further deteriorate and create similar problems in the future.

Data depicts that much of the City's housing stock was constructed during the nineteenth and early twentieth centuries when the City was a thriving manufacturing epicenter. Row house development was an inexpensive way of providing housing for a growing industrial workforce. As these homes have aged, owner-occupant, particularly elderly persons, experience difficulty in keeping up with critical maintenance and repair needs until these homes become unsafe. The lack of regular maintenance, especially roof repair and/or replacement, accelerates property deterioration and increases the cost of repair. Vacant and abandoned properties are a serious threat to the social stability and economic well-being of the neighborhoods in which they are located.

Abandonment of the housing stock continues to be a major problem for Camden. In many areas where property values have decreased, owners are unwilling or unable to invest in maintaining or upgrading major systems. When plumbing, heating, drainage and roofs fail, properties become uninhabitable and are vacated. The City has made efforts to preserve some vacant properties by cleaning and sealing them. However water damage, fire damage and vandalism eventually weakens the structural integrity of many such properties to the point where they become dangerous and must be demolished. Current neighborhood strategic planning for many of the City's most deteriorated areas requires the systematic demolition of large numbers of abandoned properties in order to remove blight and create cleared sites for new development.

Many rental property owners are unwilling or unable to invest the capital needed to upgrade major systems and complete other improvements to tenant-occupied housing. As with owner-occupied housing, many rental units deteriorate to the point where they become uninhabitable or are shut down as a result of City code enforcement. These rental units contribute significantly to Camden's vacant property inventory. During the 1990's, this inventory included a substantial number of older substandard public housing units most of which have been demolished pursuant to HUD directives or in connection with site assemblage for HOPE VI ventures.

In Camden, a housing unit is considered "standard" if it is in compliance with municipal housing and property maintenance codes. Because these codes "grandfather" certain pre-existing conditions associated with factors such as minimum room sizes and stairway widths, the precise number of housing units that can be categorized as standard based on a consistent application of municipal codes cannot be determined.

For the purposes of the Consolidated Plan, a housing unit is termed "substandard" if it requires major repair or replacement of one or more major systems or it requires rehabilitation costing \$25,000.00 or more in order to achieve compliance with municipal codes.

Census data and other statistics are not sufficient guides for determining whether a substandard property is suitable for rehabilitation. Since most houses in the city were built before 1940, age of housing, by itself, is not a useful indicator. However, the City has experienced substantial issues with lead abatement, which presents strong correlation to the age of the housing stock. In addition, lead abatement activities are expensive. Because major systems repair and replacement needs vary widely in scope and cost, the existence of major systems deficiencies, by itself, is not a useful indicator either. Some vacant houses may be suitable for rehabilitation, but the determination of whether or not a particular house is to be rehabilitated should be based on a variety of factors including house and block conditions, real estate market characteristics, and the level of subsidy required to complete rehabilitation. With regard to the latter factor, the City of Camden will not provide development subsidy funding for housing ventures that

exceed Section 211(D)(3) limits.

Housing Market Analysis

As Camden's population declined in the late 20th Century, and continues to decline, the number of housing units available for sale or rent exceeds the housing market demand. The shortage of eligible and willing buyers and renters is continuing to result in an increasing number of vacant, boarded-up housing units, many of which were abandoned after efforts to sell or rent them proved unsuccessful. Ultimately, the continued loss of the City's population strongly contributes to the disinvestment of the City's housing stock and increased vacancies and abandonment.

According to Census Data, Camden's housing inventory increased by just 0.6% from 2000 to 2018. Much of this little growth has been in the form of multi-unit housing, as housing units in structures with 3 or more units increased by 20% from 2000 to 2018. ESRI projects (from 2010 to 2024) growth for the City's housing units by 290 units, 141 from 2019 to 2024. The DVRPC projects that Camden's population will slowly start to increase minimally as of 2020.

Current median household income(ACS 2013-2017) is \$26,105 in Camden, compared to \$57,652 for all U.S. households. ESRI projects that the City's median household income will be \$30,939 in 2024). In 2010, median household income was \$27,027 compared to \$23,421 in 2000. While showing steady progression, availability and access to employment will continue to be a contributing factor on the City's housing market.

According to the 2014-2018 ACS 87.41 percent of the civilian labor force in the City's market area is employed and 12.59 percent are unemployed. In comparison, 94.14 percent of the U.S. civilian labor force is employed and 5.86 percent are unemployed. Like national trends, nearly all the growth has occurred in the service-providing sectors. According to the U.S. Department of Housing and Urban Development (HUD), employment in the education and health services and the leisure and hospitality sectors has increased steadily since the mid-1990s.

Camden's housing market is influenced by the combination of its housing stock, population loss and depressed income. These factors have directly contributed to the City's widespread housing deterioration and abandonment. Other basic factors include significant housing affordability and house maintenance problems for lower-income residents and residents with special needs. The City should continue to replicate its success of the affordable and market-rate housing developments located on the waterfront and throughout the City. The City should maintain its ambitious market-rate housing plans proposed for the waterfront and downtown. However, the time, cost and resource commitments associated with repairing or rehabilitating aging housing stock, clearing sites for new development and financing affordable housing to meet current and future demand make potential resolution of the City's housing development a difficult challenge.

According to the 2014-2018 ACS, there were 29,938 housing units in Camden with a vacancy rate of 17.41%, compared to the 10.87% of units being vacant in all of New Jersey. In 2000, according to the Census , 18.8% of units were vacant in Camden.

Property values are much lower in Camden compared to most of the region and state. Of those properties sold in 2017 according to the PolicyMap and Zillow.com, the median sales price was \$30,000, dramatically lower than the Median Sales Price in Camden County-\$142,000 and New Jersey-\$260,000. Since 2010, the

Median Sales Price of homes have decreased as in 2010 the Median Sales Price in Camden was \$35,000, Median Sales Price was also higher in 2010 in the County and State. Large amounts of foreclosures, sheriff's auction sales, tax lien foreclosures and generally a distressed housing market is one of the reasons for such low median sale prices in Camden.

According to PolicyMap and Zillow home sales started to increase as of 2017 which had 637 home sales. Prior to that from 2011 to 2016, Camden averaged 419 home sales a year. A stark contrast from 2005 to 2010, when Camden averaged 883 home sales a year

According to RealtyTrac, as of February 2010 Camden has 334 properties in some stage of foreclosure (default, auction or bank owned). Camden has a foreclosure rate of 1 in every 1,158 housing units. Camden County has a foreclosure rate of 1 in every 716 properties. and the State of New Jersey had a foreclosure rate of 1 in every 1,453 housing units. Therefore, indicating that Camden has a lower foreclosure rate than the County and State.

In a neighborhood housing market analysis of Camden, The Reinvestment Fund (TRF) noted that "Camden is positioned squarely between Philadelphia's high valued downtown and the quickly growing residential and commercial markets found in Haddonfield, Moorestown, Evesham and Voorhees...Yet residential vacancies continue to swell in Camden and neighboring communities such as Merchantville, Collingswood, Pennsauken and Gloucester City have felt the pain of real estate market distress." TRF's analysis, which was based on census data, addition and alteration permits, demolition permits, median sales prices, percent of owner-occupied property, percent of homes built before 1950, percent of commercial properties, and percent of high risk credit scores, resulted in a delineation of market types within the City and adjacent areas.

According to TRF's analysis, most of the City consists of Reclamation markets (in which abandonment rates are high, property values are low, and all other indicator provide evidence of failing real estate markets) or Distressed Public markets (in which conditions are slightly better, due in part to the existence of a substantial amount of government subsidized rental housing).

A few relatively small sections of Camden are categorized as Transitional markets. Located in or near the downtown or waterfront areas and in some small areas at the southern or eastern edges of the city, Transitional markets have higher average real estate values, lower abandonment, and more investment activity, as documented by the higher number of alteration and addition permits issued for properties in these areas.

Markets in adjacent suburban areas are grouped into three categories, High Value, Strong Value and Steady. These areas are characterized by strong real estate markets (with High Value the strongest), high property values relative to most of the rest of the region and positive real estate indicators. None of these market types exist within the city itself.

Based on this analysis, TRF recommended a framework for future investment that emphasizes preservation activities in strong market areas (including housing rehabilitation, with demolition of any dangerous buildings and some infrastructure improvements) and significant relocation, demolitions and site assemblage for future development in the weaker market areas, to be accompanied by investments in support of community members and organizations.

In Camden, an estimated 60.97% (15,077 households) of the City rented their home in 2018. By 2024 according to ESRI 14,742 households are projected to rent their homes. Rental units vary by size and provide a relatively even distribution from efficiencies to units with 3- or more bedrooms, with the plurality of units being 3 or more bedrooms. According to the 2014-2018 ACS, the median rent was \$899/month. Approximately 2,300 renter households paid more than 1,000/month in rent, this is 15.82% of those households that were paying rent. According to 2012-2016 CHAS data, 8,445 renters in Camden were cost burdened (paying more than 30% of their income towards rent) and 5,400 were severely cost burdened (paying more than 50% of their income towards rent). Furthermore, approximately 94.85 percent of cost burdened renters earned less than 50% of the Area Median Family Income in 2016.

Most of Camden's housing inventory consists of one- to four-unit structures, most often single-family row houses, some of which were designed for single-unit occupancy but subsequently converted to multi-family use. According to the 2014-2018 ACS, 9,650 of Camden's housing units are owner-occupied and 15,077 are tenant-occupied.

Residential Building Permits

The U.S. Department of Housing and Urban Development reported that single-family building permit authorizations in the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Core Base Statistical Area dropped from a high of 15,504 in 2004 to 4,962 in 2009. However, post-recession revival has shown an up-tick in single family housing development but not to the extent that occurred in the earliest part of the turn of the 21st century. Multi-family permit authorizations peaked in 2004 then dropped sharply in the following two (2) years, with only 9,542 permits issued in 2006 and 7,269 issued during 2007. Again, post-recession revival of the housing market, particularly in apartment development, continues to rise and more so than the earliest part of the turn of the 21st century.

Units Authorized By Building Permits By Core Base Statistical Areas (CBSAs)[†]
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
(Includes Permit Area that Only Report Once a Year)

	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005	2004	2003
Single Family	6,875	7,233	7,016	6,548	6,379	6,252	5,175	4,456	5,186	4,963	7,269	9,542	11,717	15,041	15,504	15,367
Multi-Family	6,281	6,311	5,229	5,769	7,252	4,965	4,095	2,523	1,867	2,130	3,301	3,935	5,495	5,201	5,506	5,713
5+ Units	5,375	5,540	4,463	5,060	6,523	4,230	3,537	2,067	1,338	1,823	3,025	3,564	4,958	4,668	5,014	5,279
Total	13,156	13,544	12,245	12,317	13,631	11,217	9,270	6,979	7,053	7,093	10,570	13,477	17,212	20,242	21,010	21,080

[†] SOCDS Data Base at: <http://socds.huduser.org/permits/summary.odb>

Rental Housing and Housing Affordability

The table below shows the HUD fair market rent levels calculated for apartments of various sizes in the Camden City by zip code (which is part of the **Philadelphia-Camden-Wilmington, PA-NJ-DE-MD CBSA**).

HUD Fair Market Rents[†]						
Area Jurisdiction (By Zip Code)	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	
08101	\$ 850.00	\$ 990.00	\$ 1,200.00	\$ 1,500.00	\$ 1,720.00	
08102	\$ 780.00	\$ 920.00	\$ 1,110.00	\$ 1,380.00	\$ 1,590.00	
08103	\$ 830.00	\$ 970.00	\$ 1,180.00	\$ 1,470.00	\$ 1,690.00	
08104	\$ 780.00	\$ 910.00	\$ 1,100.00	\$ 1,370.00	\$ 1,570.00	
08105	\$ 820.00	\$ 970.00	\$ 1,170.00	\$ 1,460.00	\$ 1,670.00	
Average By Zip Code	\$ 812.00	\$ 952.00	\$ 1,152.00	\$ 1,436.00	\$ 1,648.00	

[†] 2020 U.S. Department of Housing and Urban Development, National Low Income Housing Coalition

According to the 2013-2017 ACS, median gross rent was \$896.00. Median fair market rents in Camden (averaged for all zip codes) are \$812.00 for efficiency apartments, \$952.00 for one-bedroom apartments, \$1,152.00 for two-bedroom apartments, \$1,436.00 for three-bedroom apartments and \$1,648.00 for four-bedroom apartments.

Based on this information, the table below provides annual and monthly wages that a single-person household would have to earn in order to afford a two-bedroom apartment priced at HUD FMR. Based on the 2020 median family income estimates, rental housing in these areas appears to be more affordable than in other real estate markets, with housing priced at Fair Market Rent levels affordable to families and households at or significantly below the median.

2020 Rental Housing Affordability		
Camden City		
Fair Market Rent for 2-Bedroom Apartment	\$	1,152.00
Income Needed to Afford 2-BR apt at FMR		
Annual	\$	46,080.00
Monthly	\$	3,840.00
FY 2020 Median Family Income (HUD estimate)		
Area Median	\$	90,099.00
HUD Income Limits		
Low Income/Family of Four (80% area median)	\$	72,079.20
Very Low Income/Family of Four (50% area median)	\$	45,049.50

†2020 U.S. Department of Housing and Urban Development, National Low Income Housing Coalition

In today's especially restrictive mortgage market, many prospective homebuyers with incomes at or below median would be likely to have difficulty qualifying for financing. However, assuming the availability of mortgage financing and assuming that buyers obtain mortgages for which debt service does not exceed thirty percent of income, the mortgage amounts and associated home purchase prices that would be available to buyers within the income ranges associated with 100 percent, 80 percent, and 50 percent of median family income as characterized above.

E. Disability Status

A handicap is defined as a physical or mental impairment that substantially limits one or more life activities. Discrimination based on physical, mental, or emotional handicap, provided "reasonable accommodation" can be made is prohibited. Reasonable accommodation may include changes to address the needs of the disabled persons and may include adaptive structural changes as well as administrative changes, provided these changes can reasonably be made.

It is difficult to accurately determine the size of the disabled population in a given area largely due to difficulty in defining what constitutes a disability. Census estimates traditionally define the handicapped population from a rather narrow perspective.

The 2013-2017 American Community Survey (ACS) (U.S. Census) reported 12,280 disabled persons within the City of Camden, representing 16.7% of the population, thus making it difficult to produce or retrofit accessible housing supply to meet the City's high demand.

Disability Status of the Civilian Noninstitutionalized Population [†]	
	Estimate
Population 5 years and under	66,872
With a disability	93
Population 5 to 17 years	16,853
With a disability	1,815
Population 18 to 64 years	43,322
With a disability	7,363
Population 65 years and over	6,877
With a disability	3,009

[†] 2013-2017 ACS 5-Year Estimates

According to the Housing Consortium for Disabled Individuals (HCDI), a non-profit advocacy organization, another approach to developing estimates of the size of the disabled population has been to say that, on a national level, one out of every six individuals has sustained a disabling condition. This approach represents a more broad-based estimate that includes disabilities that may not involve a mobility or self-care limitation such as heart disease, kidney disease, or diabetes. Given the City's current population estimates, the HCDI figures indicate that approximately 13,000 City residents have a disabling condition – consistent with Census numbers reported above.

Of these populations, 2.4% have a hearing difficulty; 4.0% have a visual difficulty; 8.4% have a cognitive difficulty; 9.9% have an ambulatory difficulty; 4.1% have a self-care difficulty; and 8.8% have an independent living difficulty.

People in group quarters within the City of Camden

According to the 2013-2017 ACS, there are 2,645 living in group quarters, which is defined when the living quarters contain nine (9) or more persons unrelated to the householder or person in charge (a total of at least 10 unrelated persons).

Unfortunately, the only recent available data for group quarters population by group quarters type is from the 2010 decennial census. Ultimately, the numbers show a decrease of total persons in group quarters; however, a thorough comparative analysis cannot be accomplished by type without new decennial census data.

Group Quarters Populations by Groups Quarters Type[†] Camden City	
Total:	3,321
Institutionalized population (101-106, 201-203, 301, 401-405):	2,229
Correctional facilities for adults (101-106):	1,816
Federal detention centers (101)	0
Federal prisons (102)	0
State prisons (103)	0
Local jails and other municipal confinement facilities (104)	1,742
Correctional residential facilities (105)	74
Military disciplinary barracks and jails (106)	0
Juvenile facilities (201-203):	123
Group homes for juveniles (non-correctional) (201)	35
Residential treatment centers for juveniles (non-correctional) (202)	88
Correctional facilities intended for juveniles (203)	0
Nursing facilities/Skilled-nursing facilities (301)	290
Other institutional facilities (401-405):	0
Mental (Psychiatric) hospitals and psychiatric units in other hospitals (401)	0
Hospitals with patients who have no usual home elsewhere (402)	0
In-patient hospice facilities (403)	0
Military treatment facilities with assigned patients (404)	0
Residential schools for people with disabilities (405)	0
Noninstitutionalized population (501, 601-602, 701-702, 704, 706, 801-802, 900-901, 903-904):	1,092
College/University student housing (501)	423
Military quarters (601-602):	0
Military barracks and dormitories (non-disciplinary) (601)	0
Military ships (602)	0
Other noninstitutional facilities (701-702, 704, 706, 801-802, 900-901, 903-904):	669
Emergency and transitional shelters (with sleeping facilities) for people experiencing homelessness (701)	264
Group homes intended for adults (801)	37
Residential treatment centers for adults (802)	11
Maritime/merchant vessels (900)	0
Workers' group living quarters and Job Corps centers (901)	0
Other noninstitutional facilities (702, 704, 706, 903-904)	357

[†] 2010 U.S. Census Summary File 1

Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

FAIR HOUSING LAWS

The Federal Fair Housing Act

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

What does the Fair Housing Act prohibit?

In the Sale and Rental of Housing - No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions, or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

In Mortgage Lending - No one may take any of the following actions based on race, color, national origin, religion, sex, familial status, or handicap (disability):

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

Other Prohibitions - It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

Additional Protections for the Disabled If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary, for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.)
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary, for the disabled person to use the housing.
- A "reasonable accommodation" is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to fully enjoy their apartment or house. Common accommodations include providing a mobility impaired person with an accessible parking space, allowing a tenant who is blind to have a service animal, and allowing tenants with mental disabilities to designate a friend to mail their rent payment.

Requirements for New Buildings -In buildings that are ready for first occupancy after March 13, 1991, and have an elevator and four or more units:

- Public and common areas must be accessible to persons with disabilities
- Doors and hallways must be wide enough for wheelchairs
- All units must have:
 - An accessible route into and through the unit
 - Accessible light switches, electrical outlets, thermostats, and other environmental controls
 - Reinforced bathroom walls to allow later installation of grab bars and Kitchens and bathrooms that can be used by people in wheelchairs.

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in State or local law.

Housing Opportunities for Families - Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent
- A person who has legal custody of the child or children or the designee of the parent or legal custodian, with the parent or custodian's written permission. Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

- Housing for older persons is exempt from the prohibition against familial status discrimination if:
 - The HUD Secretary has determined that it is specifically designed for
 - and occupied by elderly persons under a federal, State, or local
 - government program or
 - It is occupied solely by persons who are 62 or older or
 - It houses at least one person who is 55 or older in at least 80% of the
 - occupied units, and adheres to a policy that demonstrates the intent to
 - house persons who are 55 or older.

A transition period permits residents on or before September 13, 1988, to continue living in the housing, regardless of their age, without interfering with the exemption.

The New Jersey Law Against Discrimination

The New Jersey Law Against Discrimination (LAD) was first adopted in 1945 and, as such, was the nation's first civil rights statute. The LAD has been amended numerous times, and, in its current form, it protects against discrimination based on race, creed, color, national origin, nationality, ancestry, age, sex (including pregnancy), familial status, marital status, domestic partnership status, affectional or sexual orientation, atypical hereditary cellular or blood trait, genetic information, liability for military service, and mental or physical disability, perceived disability, and AIDS and HIV status.

The LAD prohibits unlawful discrimination in the areas of employment, housing, places of public accommodation, credit, and business contracts. So, not all of the above prohibited bases for discrimination are protected in all areas of activity. Specific to fair housing, the LAD prohibits discrimination based on the following:

- Race, Creed, Color, National Origin,
- Sex, Gender Identity or Expression,
- Marital Status or Civil Union Status,
- Affectional or Sexual Orientation,
- Familial Status,
- Actual or Perceived Physical or Mental Disability,
- Ancestry, Nationality,
- Domestic Partner Status, And
- Source of Lawful Income or Source of Lawful Rent or Mortgage Payment.

This last phrase establishes a protection above and beyond the protected classes covered by federal fair housing laws. As an example, it means that a landlord cannot deny the lawful recipient of a Section 8 housing choice voucher to rent an apartment. Such vouchers are considered lawful rent payment.

The NJ Division on Civil Rights

The Division on Civil Rights (DCR) is part of the New Jersey Office of the Attorney General's Department of Law and Public Safety and is the agency responsible for investigating discrimination complaints and eradicating illegal discrimination in New Jersey. Complaints must be filed with the Division on Civil Rights within 180 days after the alleged act of discrimination.

The complaint process works as follows: once a complaint is accepted, the Division will conduct an investigation. Following the completion of the investigation, the Director will determine whether or not probable cause exists to believe that unlawful discrimination has occurred. If a finding of probable cause is issued, the case will be transmitted to the Office of Administrative Law where a full hearing will take place before an Administrative Law Judge. The case may be litigated by a state Deputy Attorney General on behalf of the Division, or the complainant may choose to litigate the case personally or through private counsel. If a finding of no probable cause is issued, the case is closed without further proceedings by the Division. If the Director has not made a probable cause determination within 180 days of the filing of the complaint, the complainant may request to litigate the case at the Office of Administrative Law either personally or through private counsel (but not by a Deputy Attorney General).

If, after investigation and an administrative hearing of a complaint, the Director determines that unlawful discrimination occurred, the Director can order the respondent to take affirmative action to remedy the discrimination. The Director is authorized to order relief such as reinstatement, hiring, or upgrading of the employee, and may also award back pay and damages for pain and humiliation. Further, after the hearing, the Director may also award attorneys' fees to prevailing complainants and may assess a statutory penalty against the responding party. Alternatively, an aggrieved party may file a complaint in New Jersey Superior Court within two years of the alleged violation.

A person may initiate an action in Superior Court without first filing a complaint with the Division. However, filing a complaint in Superior Court bars the filing of a simultaneous complaint with the Division because a person may not process a complaint of discrimination simultaneously before the Division and in Superior Court. A person who files an action in Superior Court is entitled to a jury trial. A successful litigant may be awarded reinstatement, hiring or upgrading, and back pay, as well as damages for pain and humiliation. In more egregious cases, an award of punitive (punishment) damages may be made. An award of attorney's fees is also available to prevailing parties in Superior Court.

Penalties for Violations of the LAD

Penalties for violation of New Jersey Law Against Discrimination are as follows: up to \$10,000 for the first violation, up to \$25,000 for the second violation within 5 years, and up to \$50,000 for two or more violations within seven-year period.

The NJ Division on Civil Rights

The Division on Civil Rights (DCR) is part of the New Jersey Office of the Attorney General's Department of Law and Public Safety and is the agency responsible for investigating discrimination complaints and eradicating illegal discrimination in New Jersey. Complaints must be filed with the Division on Civil Rights within 180 days after the alleged act of discrimination.

The complaint process works as follows: once a complaint is accepted, the Division will conduct an investigation. Following the completion of the investigation, the Director will determine whether or not probable cause exists to believe that unlawful discrimination has occurred. If a finding of probable cause is issued, the case will be transmitted to the Office of Administrative Law where a full hearing will take place before an Administrative Law Judge. The case may be litigated by a state Deputy Attorney General on behalf of the Division, or the complainant may choose to litigate the case personally or through private counsel. If a finding of no probable cause is issued, the case is closed without further proceedings by the Division. If the Director has not made a probable cause determination within 180 days of the filing of the complaint, the complainant may request to litigate the case at the Office of Administrative Law either personally or through private counsel (but not by a Deputy Attorney General).

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FAIR HOUSING LAWSUITS AND COMPLAINTS

U.S. Department of Housing and Urban Development (HUD)

Fair housing complaints can be filed directly with the U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity. HUD is responsible for investigation and adjudication. Cases that HUD investigates are usually resolved by administrative hearing. Complainants also have the option of filing suit in Federal District Court.

On January 28, 2020 Triad Associates emailed the HUD-Office of Fair Housing and Equal Opportunity in New York. Inquiring about housing complaints filed in Camden. HUD responded by email, supplying data from January 1, 2010 until February 18, 2020.

This section of the *Analysis of Impediments to Fair Housing* provides a review of the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section of the *Analysis of Impediments to Fair Housing* will review the existence of any fair housing discrimination suits filed by the Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

New Jersey Division on Civil Rights

The New Jersey Division on Civil Rights is responsible for the enforcement of the New Jersey Law Against Discrimination (LAD). Complaints must be filed with the Division within 180 days after the alleged act of discrimination. Once a complaint is accepted, the Division will conduct an investigation.

Following the completion of the investigation, the Director of the Division will determine whether or not probable cause exists to indicate an occurrence of discrimination has occurred. If a finding of probable cause is issued, the case is transmitted to the Office of Administrative Law where a full hearing will take place before an Administrative Law Judge.

On January 28 2020, Triad Associates emailed the New Jersey Division of Civil Rights inquiring about housing complaints filed in Camden. The request was for a list of all fair housing complaints and, including the alleged basis of discrimination and how each case was resolved or concluded.

Existence of Fair Housing Discrimination Suit

The City's believes there are no fair housing discrimination suits that have been filed and/or are pending in Camden.

Determination of Unlawful Segregation

There has been no determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973 in Camden City. Additionally, the Secretary has not issued a charge under the Fair Housing Act regarding assisted housing in the City of Camden.

Identification of Impediments

This section of the *Analysis of Impediments to Fair Housing* will discuss the existing conditions within the City of Camden that limit the choice of fair housing among owners and renters of similar income levels. This analysis is based upon the collected data describing the seven protected classes and the demographic assessment conducted for the City.

Identification of the barriers to fair housing is accomplished by analyzing the following:

- A. Progress on Previously Identified Impediments
- B. Public sector actions; and
- C. Private sector actions.

These areas will be discussed in order to determine the current existence of any impediments to fair housing in Camden City.

Progress on Previously Identified Impediments

A. Progress on Previously Identified Impediments

Impediment I – Lack of Education Regarding Fair Housing Laws

As in many municipalities, there is an increased need for education, outreach, and referral regarding the Fair Housing Act and the New Jersey Law Against Discrimination (LAD). The LAD prohibits discrimination when selling or renting property. The law covers owners, agents, employees and brokers and makes it unlawful to refuse to rent, show or sell property based on a person's race, creed, color, national origin, nationality, ancestry, marital status, domestic partnership status, familial status, affectional or sexual orientation, sex, or mental and physical disability, including AIDS and HIV-related illness.

Update on Actions to Address Impediment I

The City will continue to support education of the public with regard to fair housing and to assist the public with connection to agencies that help with fair housing problems. Information provided to the public needs to be presented in an accessible, readable format so that it is easy to understand. The information needs to be updated annually to ensure that it contains the most recent information. The information will be distributed.

Impediment II – Lack of Awareness Regarding Complaint Process

Some confusion exists concerning whom to turn to when a violation of fair housing law is alleged to occur, as well as how to access the State and Federal fair housing complaint system. In addition, the State and Federal processes to file a fair housing complaint are viewed as complicated. There is a general fear of retaliation that may prevent complainants from filing a fair housing complaint.

Update on Actions to Address Impediment II
[TBD]

Impediment III – Transportation Availability and Access to Jobs

Camden's network of transportation facilities plays an important role in the economy of the region and of the City. Since the City's road network is essentially built out, maintaining and selectively improving Camden's system of roadways and bridges to provide for safe and efficient movement of people, goods and services is emphasized over major new roadway construction. Furthermore, the existence of viable public transportation is key for residents to be able to access jobs in and outside of the city.

Update on Actions to Address Impediment III
[TBD]

Impediment IV – Bias in Lending, Credit Counseling & Money Management

The most common cause of denial is lack of credit history or poor credit history. More consumer education on credit and purchasing a home needs to be available.

Update on Action to Address Impediment IV
[TBD]

Impediment V – Lack of Affordable Housing

The City of Camden has a long-standing commitment to providing affordable housing and has consistently used available resources to support this goal.

Homeownership is inaccessible to many Camden residents who may need assistance in obtaining credit or who may not have sufficient funds to pay for down payment and closing costs. The City has supported housing counseling services and financing support to help address these barriers on an ongoing basis.

The combination of land assembly, environmental remediation, and construction/rehabilitation costs amounts to a significant per-unit expense for affordable housing producers, and the need for gap financing is significant in every area of the City.

In 2010, the Median Household Income was \$27,027 .00 in Camden, compared to \$69,811 in New Jersey and \$51,914.00 for all U.S. households. In 2017 the Median Household Income was \$26,105. From 2010 to 2017 Median household income decreased in Camden by -3.41%, while it increased by 9.55% in New Jersey and 11.05% nationwide. This suggests that the City has an inherent need for a significant amount of affordable housing. As the housing stock continues to age, unit rehab and replacement will continue to be in demand.

Update on Action to Address Impediment V

[TBD]

Impediment VI – Lack of Housing for the Disabled

A handicap is defined as a physical or mental impairment that substantially limits one or more life activities. Discrimination based on physical, mental, or emotional handicap, provided “reasonable accommodation” can be made is prohibited. Reasonable accommodation may include changes to address the needs of the disabled persons and may include adaptive structural changes as well as administrative changes, provided these changes can reasonably be made.

Persons with disabilities face other challenges that may make it more difficult to secure both affordable or market-rate housing, such as lower credit scores, the need for service animals (which must be accommodated as a reasonable accommodation under the Fair Housing Act), the limited number of accessible units, and the reliance on Social Security or welfare benefits as a major income source.

Update on Action to Address Impediment V

[TBD]

Impediment VI – Language Access for Limited English Proficient (LEP) Persons

Over the past several years, the City has recognized the cultural diversity of Camden residents and understands the need to address the language access needs of underserved, limited English proficient residents. For example, Hispanics are the fastest growing segment of City’s population. The City experienced a significant growth amongst Latino populations (17% increase from 2000 to 2017) a continuation of a similar trend and demographic shift that occurred in the 1990s.

The percentage of Hispanic persons is significantly above the state and national percentages at 48.5% of the City’s total population. According to the 2013-2017 ACS, 30.7% of Camden residents identified themselves as being of Puerto Rican heritage. This constitutes the 10th highest proportion of Puerto Ricans in a municipality on the United States mainland.

Update on Actions to Address Impediment VI

Executive Order (EO) 13166, signed on August 11, 2000, directs all federal agencies, including HUD, to work to ensure that programs receiving federal financial assistance provide meaningful access to LEP persons. Pursuant to EO 13166, the meaningful access requirement of the Title VI regulations and the four-factor analysis set forth in the Department of Justice (DOJ) LEP Guidance apply to the programs and activities of federal agencies, including HUD. In addition, EO 13166 requires federal agencies to issue LEP Guidance to assist their federally assisted recipients in providing such meaningful access to their programs. This Guidance must be consistent with the DOJ Guidance. Each federal agency is required to specifically tailor the general standards established in DOJ’s Guidance to its federally assisted recipients. On December 19, 2003, HUD published such proposed Guidance. As such, the City will update the following:

- **Language Access Plan:** This identifies the Limited-English speaking population in our

- community and ways in which language access will be provided.
- **Provide appropriate language assistance:** For example, translation of materials, staff training, interpreters, and coordination with other services/agencies for translation services.
 - **Affirmative Marketing Plan.** When a rental housing or homeowner project containing five or more units is planned to be constructed, the City and/or its subrecipients will provide information to the community that attract eligible persons who are least likely to access affordable housing opportunities. This may include low- to moderate-income individuals, minority residents, the LEP population, and residents of manufactured housing. With changing demographics in Camden, there are challenges when marketing to the eligible populations that are Limited English Proficient (LEP). In areas where there is a significant LEP population, Camden will continue strive to meet this need by:
 - Translating key marketing materials;
 - Working with the minority-owned print media, radio and television stations;
 - Partnering with faith-based and community organizations that serve newly arrived immigrants;
 - Promoting and offering marketing activities and educational sessions in Spanish at community outreach events, such as Homebuyer Fairs; and
 - Providing a stipend to bi-lingual staff members who work directly with and provide assistance to the LEP population.

Additional guidance on Limited English Proficiency guidance from HUD can be found at: <http://www.hud.gov/offices/fheo/promotingfh/lep-faq.cfm>.

Impediment VII – Access to Affordable Housing

Access to affordable housing opportunities are usually dissuaded by awareness of available opportunities. The Affirmative Marketing Program is a regional marketing strategy designed to attract buyers and/or renters of all majority and minority groups, regardless of race, creed, color, national origin, ancestry, marital or familial status, gender, affectional or sexual orientation, disability, age or number of children to housing units which are being marketed by a developer or sponsor of affordable housing. The Affirmative Marketing Program is also intended to target those potentially eligible persons who are least likely to apply for affordable units in that region.

Update on Actions to Address Impediment VII

[TBD]

Impediment VIII – Geographic Concentration of Minority & Ethnic Groups

The 2014-2018 ACS determines that areas of racial concentration occur within 14 census tracts throughout the City among four (4) racial and ethnic groups. No Census Tracts have multiple racial concentrations within a one census tract. The first area of concentration is an analysis using a minority group within the City (Asian , Non-Hispanic), whereby Census Tract 6011.02 has a disproportionate number of Asian, Non-Hispanic residents, approximately 18.2% of the population in that area and well more than 10 percentage points above the City's overall percentage. This is an area of Pavonia in East Camden adjoining a part of Pennsauken Township that also has a relatively large Asian population. This area is majority Hispanic but does not have a concentration of Hispanic residents, it is adjacent to where to all areas of Hispanic concentration in Camden.

Update on Actions to Address Impediment VIII

[TBD]

B. Public Sector

An important element of the *Fair Housing Analysis* involves an examination of public policy in terms of its impact on housing choice. Public sector decision makers exert a profound effect on housing opportunities. Such policies as land use and zoning determine the kind of housing that can be found in a community. Other policies such as the location of parks, schools, transportation routes, and services also effect the composition of housing.

From a regulatory standpoint, local government measures to control land use such as zoning and subdivision define the range and density of housing resources that can be introduced to a community. Housing quality standards are enforced through the local building code and inspections procedures.

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for low-income housing has shifted much of the challenge of affordable housing production to state, county, and local government decision makers.

Finally, a community's sensitivity to housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships and the extent to which these individuals relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of housing choice requires a team effort, and public leadership and commitment is a prerequisite to strategic action.

The purpose of this section of the *Analysis of Impediments to Fair Housing* is to evaluate the public policies within Camden City, the potential for impediments due to the policies, and to determine opportunities for furthering the expansion of housing choice for the protected classes.

Land Development Regulations and Development Standards

Land use regulations that affect the protected classes by acting as impediments to fair housing include:

- Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, or require inordinately large lot sizes that deter affordable housing development;
- Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit; and
- Placing administrative and siting constraints on group homes.

Comprehensive zoning and subdivision regulations that are considerate of the protected classes should also provide for handicapped parking as a percentage of the total minimum parking requirements along with curb cuts with the handicapped parking.

Zoning ordinances and environmental regulations impact the amount of land available for development and thus, impact land and housing costs. The most basic control of land use in New Jersey is local zoning (home rule).

The implementation of development standards sets minimum levels of protection for the public. However excessive street widths, parking requirements, curbing and landscaping add to the cost of housing. Also, certain housing rehabilitation costs are increased because of the Uniform Construction Code (UCC). If the rehabilitation cost for a building exceeds fifty percent of its value, then the entire building must conform to the construction code. Other elements are accessibility standards, energy conservation and environmental cleanup regulations. The State has now gone to a use-based set of cleanup standards for contaminated sites, where residential uses must meet the highest standards for obvious reasons.

The following is a listing of each zoning district located within the City that allows residential development. The existing zoning provides a variety of opportunities to a variety of mixed-incomes and types of housing:

- R1A District
- R1 District
- R2 District
- C1 District
- C2 District
- C3 District
- C-W Commercial Waterfront District
- I-R Institution Residence Mixed Use District
- C-R Commerce Residence Mixed Use District
- M-R Manufacturing Residence Mixed Use District
- C-C City Center Flexible Development District

The existing zoning provides a variety of opportunities to provide a mix of incomes and types of housing throughout the City. Of the 11 districts that permit residential development, nearly all of them permit multi-family options consistent with urban development patterns. With suitable lot size bulk standards, strategic location to transit and transportation corridors, and connection and proximity to jobs, these opportunities are appropriately located for fair housing opportunities for low- and moderate-income families, and other HUD protected classes.

Additional City Regulations

The City also has multiple commissions and advisory boards in place to deal with the diversity of the City, especially as it relates to HUD's protected classes. The boards are enacted in order to protect the general welfare of the citizens and inhabitants of the City. They include:

- African American Advisory Board
- Veterans Advisory Commission
- Cultural & Heritage Commission
- Hispanic Commercial Business Advisory Commission

- HIV & AIDS Advisory Commission

Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. In New Jersey the school districts impose the largest share of the property tax. The reliance of schools on local taxes results in continuing increases in the property tax millage. The increases are most burdensome to low income homeowners. The tax increases are also usually passed on to renters through rent increases. There is a need to reform tax policy in New Jersey to reduce impediments to housing choice. The communities often are populated by long-time residents, many of whom are older and in need of services. While Camden City is largely residential, there are some major commercial and industrial districts throughout the City that may provide some (but minor) tax relief to those municipalities with relatively high property taxes.

School Quality Data

[\[Update\]](#)

Hate Crime Data

[\[Update\]](#)

Lead Paint Data

Lead-based paint poses a particular hazard to children under the age of six, and is the focus of efforts by HUD to raise awareness of the problem and mitigate or eliminate the hazard. Lead-based paint was banned in 1975, but housing constructed prior to that time typically contains lead-based paint to some degree.

Lead poisoning remains a serious concern in all areas of the City. No neighborhood, except the Central Waterfront, which has undergone significant redevelopment, has a concentration of older homes (pre-1969) of less than 70% and only five Census Tracts have less than 80%.

Children under the age of six are the persons most severely affected by lead poisoning. These children typically constitute about 7% of the population in an area. However, because of the age breaks in the census data, we have had to use figures for children five and under. Because virtually all areas of the City have very high ratios of pre-1969 housing, any area with a high concentration of younger children is a concern for lead-based paint poisoning. The Neighborhoods with the highest concentrations of children under the age of five are; Waterfront South, Centerville, Morgan Park, Marlton, Rosedale and the western half of Cramer Hill.

The City Department of Code Enforcement works cooperatively with the Southern Regional Childhood Lead Poisoning Prevention Coalition. The SRCLPP Coalition's activities are coordinated by the Southern New Jersey Perinatal Cooperative which is funded by the NJ Department of Community Affairs and the NJ Department of Health and Senior Services. The Coalition membership includes health institutions, human service providers, churches, affordable housing developers, and community action groups to strengthen the city's lead poisoning response and prevention efforts. The primary objectives of the Coalition's Action Plan are to increase the number of agencies that participate in the Coalition and to assist members to conduct lead poisoning prevention activities in their communities. These events are held throughout the year to disseminate public education materials outlining dangers of lead poisoning, to test for lead poisoning, and to inform the community and landlords on lead safe building maintenance practices and available lead removal funding from the state.

The SRCLPP Coalitions secondary objectives include:

- Educate and train pediatric providers to screen young children for lead poisoning
- Identify and distribute information on non-paint sources of lead
- Educate and train municipal prosecutors and judges about executing abatement orders against property owners
- Educate families and children about lead poisoning at home
- Provide information and training opportunities to property owners

The Housing Bureau completes property maintenance inspections and the Building Bureau completes inspections for uniformed construction and fire code compliances cases in existing structures as well as various development projects underway or planned. When a multi-family dwelling is found to have lead paint hazards, all residents in that development will be notified. The Department also will increase oversight of final clearance inspections and suspend or revoke the licenses of negligent abaters and clearance inspectors.

The City's Lead-Based Hazard reduction strategy involves the administration of the Lead Intervention for Children at Risk Program (LICAR). Under an agreement between the City of Camden and the Camden County Department of Health and Human Services (DHHS), the Department of Development and Planning's Division of Housing Services administers the LICAR Program, which supports the abatement or reduction of lead-based paint hazards in low-income housing.

Through this agreement, the City provides administrative and program delivery staff responsible for marketing the LICAR program; conducting application intake, review, and approval; completing environmental reviews; completing housing inspections and preparing work write-ups and cost estimates for lead hazard control work; preparing contractor bid packages and supervising advertisement for bids and selection of contractors; managing temporary resident relocation while lead hazard control work is being completed; and monitoring work in progress through to completion. The City maintains a list of Lead Safe Contractors for lead remediation activities. The list also contains one contractor that is certified to conduct lead-based paint abatement. Lead Safe Work Practice Certification classes are periodically offered at no cost to home improvement contractors by the Camden County Office of Community Development.

Through the City's Department of Health, the Director of Nursing is responsible for addressing resident concerns about lead exposure. Families are referred to their family doctor, CamCare or the Well Baby Clinic in Bellmawr.

The City is aware of the effort at the state level to re-adopt N.J.A.C. 8:51, Childhood Lead Poisoning, with amendments, new rules and repeals. These regulations establish the regulatory framework to fulfill the NJ Department of Health and Senior Services' obligation to protect children from adverse health effects due to exposure to lead hazards in their homes and in the environment. A public hearing on the proposal was conducted by DHHS on January 27, 2010. The public was allowed to provide written comments until February 19, 2010. Upon final passage of this proposal the DHHS will incorporate the amended and new rules into its Lead hazard control procedures.

Foreclosure Rates

[Update]

Public Financing

Since 1974, the City of Camden has funded a community development program with HUD CDBG and has funded community development programs through HOME funds. Funds are used for a variety of public services, planning, removal of architectural barriers, and improvements to public facilities and infrastructure that support housing and economic development throughout the City. The community development program has served to benefit primarily low-income persons in agreement with the statutory requirements.

The Camden City Department of Development and Planning, Division of Housing Services have had the responsibility of administering both the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership (HOME) Program, the Housing Opportunities for People with AIDS (HOPWA) program and the Emergency Solutions Grant (ESG) program.

The Division staff directly administers the Owner-Occupied Housing Rehabilitation Assistance Program and the Home Buyers Assistance Program. The Division oversees the Municipal construction projects for infrastructure and public facilities and the provision of youth and senior services working with municipal administrators and engineers and selected non-profit organizations. Affordable housing through non-profit and for-profit developers is also overseen by the Division staff.

Experience gained through the administration of two City home repair and improvement programs illustrates the type and extent of housing upgrading needed in owner-occupied units throughout the City.

The City's Emergency Repair Program provides grants up to \$4,000.00 to support the cost of addressing roofing, plumbing, electrical, heating, sewer and structural repair emergencies in owner-occupied homes. Priority is given to senior citizens, applicants who never received prior assistance and emergencies posing an imminent hazard (for example: broken sewer line, collapsing roof and inoperable heating system).

The City's First Time Homebuyer Assistance Program provides a subsidy of up to \$5,000.00, which is to be applied towards costs, such as down payment and closing costs, associated with purchase of property. This Program requires that participants occupy the purchased home as their principal residence. All applications will be processed on a first come serve basis and require that the applicant be a first-time homebuyer or not have owned a home during the three-year period immediately prior to applying for this

assistance. Annual income of all household members cannot exceed 80% of the median income and the property to be purchased must meet City Code Standards. No HUD-owned properties or homes sold in as-is condition will be considered. Applicant(s) must attend and complete pre-purchase counseling with a designated non-profit housing agency and obtain a certification of satisfactory completion of training session prior to settlement. Also, agreement of Sale must show evidence of applicant depositing a minimum of \$500 toward property down payment.

The City's Housing Assistance Program provides financing to enable homeowner-occupants to complete home repairs and lead paint abatement as needed to comply with City code standards. Financing (up to \$25,000) is made available in the form of a deferred loan requiring the recording of a mortgage lien against the property. The program requires completion of repairs needed in order to achieve completion with city codes.

Public Housing, HUD Assisted Housing, and Low-Income Housing Tax Credits

[Update]

Federal Requirements

U.S. Department of Housing and Urban Development (HUD) encourages its grantees to incorporate "visitability" principles into their designs. 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" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for disabled persons.

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 was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable modifications to units and/or public areas in order to allow the 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. As it relates 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.

Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make with regard to where to live. Property taxes are generally made up of county, municipal, and school district taxes. Tax increases that may occur are burdensome to low income homeowners and increases are usually passed on to renters through rent increases. If property taxes are used as a main source of school district funding, there may be a desire to limit housing for families with children to avoid the cost of paying for their schooling.

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.

Camden requires that if all of its contracts that exceed \$100,000, the Contractor must submit a Section 3 Affirmative Action Plan and Certification, along with a Section 3 Utilization Report. Camden includes the Section 3 Requirements in all of its CDBG construction activity public notices. In addition, the municipality has a Federal Construction Contract Provisions Booklet for its CDBG Program that it provides to contractors for construction improvement contracts.

During the research and study phase for the Analysis of Impediments, no impediments or complaints were mentioned or filed based on the Federal Section 3 Requirements.

B. Private Sector

Real Estate Practices

There are two local membership organizations for real estate brokers operating in or around Camden City to which Realtors within the City belong. Both the Burlington Camden County Association of Realtors and the New Jersey Association of Realtors (Association) are open for membership to any persons regardless of race, color, national origin, sex, religion, handicap or familial status.

Members of the Board and the Association are bound by the Code of Ethics of the National Association of Realtors. The Code of Ethics obligates members to maintain professional standards including affirmatively furthering fair housing. The Association enforces its Code of Ethics through a Disciplinary Commission consisting of members of the Association. The Association has an Affirmative Fair Housing Marketing Plan.

The Association makes available to their members a listing contract and agreement of sale which contains the statement from the State Attorney General about obligations and rights in the area of fair housing under State and federal laws. The members are not required to use the listing contract and agreement of sale, but under State law, any listing contract and agreement of sale must include the statement.

The Association has an Equal Opportunity/Fair Housing Committee. The Committee conducts seminars for the Association educating its members on the Fair Housing Act. Seminars have involved advertising and financing and the Committee has invited speakers from HUD and industry representatives to make presentations.

Newspaper Advertising

Under federal law, no advertising with respect to the sale or rental of a dwelling may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

The local paper, Jersey Journal, was reviewed. No ads contained questionable language. Several major real estate firms placed the HUD fair housing logo in their banner ads.

Private Financing

Because credit history is a major reason for denial of home mortgage applications in the City of Camden, it is expected that there may be opportunities for the banks to focus on the problem and work with applicants to address the on-going concern of problems with credit history. The following are actions that lenders need to consider to assist with reduction of the denial of home mortgage applications based on credit history:

- The lenders should share with the applicant the specific information on the credit report on which the denial was based.
- The lenders should give the applicant the opportunity to investigate questionable credit information prior to denial of a home mortgage application by the bank.
- The lenders should allow the applicants to offer alternative credit references in lieu of the standard traditional references.
- The lenders should take the unique credit practices of the various cultures into account when considering applications.
- The lenders should refer applicants for credit counseling or other readily available services in the community.

[\[Add HDMA Data\]](#)

C. Public and Private Sector

Fair Housing Enforcement

In addition to the Fair Housing Act, the New Jersey Law Against Discrimination (LAD) makes it unlawful to subject people to differential treatment based on race, creed, color, national origin, nationality, ancestry, age, sex, (including pregnancy), familial status, marital status, affectional or sexual orientation, atypical hereditary cellular or blood trait, genetic information, liability for military service, and mental or physical

disability, including perceived disability and AIDS and HIV status. The LAD prohibits unlawful discrimination in employment, housing, places of public accommodation, credit and business contracts.

On September 5, 2002, Governor McGreevey signed the Section 8 Anti-Discrimination bill which increases penalties for landlords who refuse to rent or lease to persons who receive federal rent subsidies or have children under the age of 18 (senior and age-restricted housing excluded). Under this law, a landlord who discriminates can be fined up to \$10,000 for a first offense and up to \$25,000 for a second offense. A person bringing action because of discrimination may be awarded a reasonable attorney's fee.

This law amends the existing "Law Against Discrimination" by prohibiting landlords from discriminating against tenants based upon a tenants' source of lawful income, such as Section 8 vouchers, or the age of their children. In addition, it also broadens the powers of housing authorities so that they can bring suit on behalf of a tenant who is discriminated against. The law is supported by a 1999 state Supreme Court ruling that says landlords cannot deny an apartment to tenants based solely on their sources of income.

The U.S. Department of Housing and Urban Development enforces the Fair Housing Act, which protects Americans against violations of housing rights. The City of Camden will act quickly and effectively on all complaints of discrimination to ensure every citizen will receive the full protection of the law.

Informational Programs

The City of Camden will continue to invest in fair housing education and outreach. To ensure that fair housing is fully integrated into its housing, especially those most affected by housing discrimination, it is recommended that the City:

- Expand on-going housing education programs for housing providers, consumers, and local government officials about fair housing laws, right, and responsibilities. These workshops should occur at varying times throughout the year and should specifically relate to persons with disabilities and families with children.
- Integrate fair housing educational programs into CDBG workshops so that housing education information related to protected classes, especially immigrants, families, persons with disabilities and people of color is disseminated.
- Raise awareness/ increase education programs on Federal Fair Housing Act and State Law Against Discrimination.
- Ensure fair housing informational resources are made available to community partners to facilitate their ability to affirmatively further fair housing.
- Ensure that translated fair housing materials are available to immigrant groups.
- Increase fair housing information and links to fair housing laws/programs on the City's web site.
- Advocate with newspapers, real estate organizations, and housing providers to increase accessibility to fair housing internet resources on their web sites and to display fair housing information/resources in their offices.
- Increase educational efforts to homeless and transitional shelters to ensure compliance with fair housing laws.
- Place housing brochures and posters to public buildings, service agencies, libraries, and any other place where the public may find information on services.

To address this strategy the City intends to expand its relationships with the Fair Housing Council of

Northern New Jersey and the Fair Housing Council of Suburban Philadelphia (<http://www.fhcsp.com/>).

The Office of Landlord/ Tenant Information, within the New Jersey Department of Community Affairs' Division of Codes and Standards and Legal Services of New Jersey, will provide legal guidance and counseling in matters of Landlord/Tenant law to City residents. They will also serve as a resource for public officials and other social service providers in need of their expertise as well as conducting appropriate community outreach activities.

Visibility in Housing

The City's website will provide information about the City's Consolidated Plan, Annual Action Plans and Fair Housing Analysis (Analysis of Impediments), as well as all Fair Housing Officer/Committee information. This is just one tool in improving the City's ability to communicate key housing, community development and fair housing information. It is helpful that the City will establish a point person to refer fair housing inquiries.

The City must also raise its fair housing visibility through public outreach. The City and its local fair housing agency partners can conduct presentations and distribute information about fair housing, through elementary schools, public libraries, affordable housing providers and community/recreation centers. One suggestion is to develop a small brochure to be placed near public use computers in libraries, computer rooms in housing developments, and in churches, containing links to the City, and local fair housing agency websites. Another idea is to place advertisements/public service announcements in the real estate section of the newspaper, asking "Have you faced discrimination in trying to find housing to rent or buy?" along with the number to call to report potential discrimination.

Summary of Primary Impediments to Fair Housing and Recommended Goals

Action	Lead Agency	Status	Proposed Funding Amount (Annually)
Impediment I – Lack of Education Regarding Fair Housing Laws			
Impediment II – Lack of Awareness Regarding Complaint Process			
Impediment III – Transportation Availability and Access to Jobs			

Impediment IV – Bias in Lending, Credit Counseling & Money Management

Impediment V – Lack of Affordable Housing

Impediment VI – Lack of Housing for the Disabled

Impediment VI – Language Access for Limited English Proficient (LEP) Persons

Impediment VII – Access to Affordable Housing

Impediment VIII – Geographic Concentration of Minority & Ethnic Groups

*Costs are for 2020 only

V. **Signature Page**

By my signature I certify that the *Analysis of Impediments to Fair Housing* is in compliance with the intent and directives of the Community Development Block Grant program and HOME program regulations.

The Honorable Francisco “Frank” Moran
Mayor, City of Camden
Camden County, New Jersey

Date

DRAFT