



Gloucester County

Analysis of Impediments *to fair housing*

Submitted By:
The Honorable Stephen M. Sweeney, Freeholder Director
Gloucester County Board of Chosen Freeholders
Gloucester County, New Jersey

**GLOUCESTER COUNTY, NEW JERSEY
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

TABLE OF CONTENTS

I.	INTRODUCTION AND GENERAL SUMMARY OF THE ANALYSIS.....	2
A.	WHO CONDUCTED.....	2
B.	PARTICIPANTS	5
C.	METHODOLOGY USED.....	5
D.	HOW FUNDED	5
E.	CONCLUSIONS: IMPEDIMENTS FOUND AND ACTIONS TO ADDRESS IMPEDIMENTS.....	5
	Impediment I – Lack of Education Regarding Fair Housing Laws	5
	Impediment II – Complaint Process	6
	Impediment III – Transportation Availability and Access to Jobs.....	6
	Impediment IV – Bias in Lending	8
	Impediment V – Lack of Decent Affordable Housing	8
	Impediment VI – Availability of Housing for the Disabled.....	9
II.	GLOUCESTER COUNTY DEMOGRAPHIC BACKGROUND DATA	9
A.	DEMOGRAPHIC DATA	9
B.	INCOME DATA	12
C.	EMPLOYMENT DATA	13
D.	HOUSING PROFILE	15
III.	EVALUATION OF CURRENT FAIR HOUSING PROFILE	27
A.	EXISTENCE OF FAIR HOUSING COMPLAINTS	27
B.	EXISTENCE OF FAIR HOUSING DISCRIMINATION SUITS	28
IV.	IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE	28
A.	PUBLIC SECTOR.....	28
	Land Development Regulations and Development Standards.....	29
	Taxes.....	30
	Public Financing.....	30
B.	PRIVATE SECTOR	31
	Real Estate Practices	31
	Private Financing	31
C.	PUBLIC AND PRIVATE SECTOR.....	32
	Fair Housing Enforcement.....	32
	Informational Programs	32
	Visibility in Housing	33
D.	DETERMINATION OF UNLAWFUL SEGREGATION	34
V.	SIGNATURE PAGE.....	34

GLOUCESTER COUNTY, NEW JERSEY
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

I. INTRODUCTION AND GENERAL SUMMARY OF THE ANALYSIS

A. WHO CONDUCTED

This *Analysis of Impediments to Fair Housing (AI)* document is a revision to the original document prepared by the Department of Economic Development, Division of Housing and Community Development of the County of Gloucester and is designed to update Census and local data and to revisit issues previously identified as Impediments.

The Housing and Community Development Act of 1974 and the National Affordable Housing Act, as amended, govern the administration of Community Development Block Grant and HOME funding and require participating jurisdictions to certify that they will affirmatively further fair housing. This means that the jurisdiction will conduct an analysis of impediments to fair housing choice; take appropriate actions to overcome the effects of impediments identified through that analysis; and maintain records reflecting the analysis and actions.

The County of Gloucester will receive an estimated \$1,533,157.00 in CDBG funds and \$790,198.00 in HOME funds in federal fiscal year 2010. The County also administers Washington Township's CDBG funds – approximately \$199,752.00 for fiscal year 2010.

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 the County's newly appointed Fair Housing Officer, in conjunction with 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 the County's Fair Housing Officer, in conjunction with 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.

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.

As an entitlement community, Gloucester County is charged with the responsibility of conducting its Community Development Block Grant (CDBG) Program, HOME Program, as well as other federal programs, in compliance with the Fair Housing Act. The responsibility is extended to non-profit organizations that receive financial assistance from the Gloucester County CDBG Program.

The purpose of this *Analysis of Impediments to Fair Housing* for the County of Gloucester 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 County.

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

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.

B. PARTICIPANTS

The County of Gloucester is a HUD CDBG entitlement county. The County of Gloucester's Department of Economic Development, within the Division of Housing and Community Development, was responsible for preparation of the *Analysis of Impediments to Fair Housing* under the direction of the Gloucester County Board of Chosen Freeholders.

C. METHODOLOGY USED

The preparation of the *Analysis of Impediments to Fair Housing* included a comprehensive review of the most recently available demographic data regarding population, housing, income, and employment. Additionally, the County reviewed and analyzed public policies affecting the siting of housing. The community also examined administrative policies concerning housing and community development, the financing and housing brokerage services and their administration in the community. Using the listed information, Gloucester County 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 County's direction, by Triad Associates, Inc., a community planning and development consulting firm.

D. HOW FUNDED

The County of Gloucester funded the *Analysis of Impediments to Fair Housing* and the revisions to the document in 2010 with funds from its CDBG entitlement.

E. 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

The County 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.

The County will assign a Fair Housing Officer within the Community Development Program.

The County will contact the HUD Regional Office of Housing and Equal Employment, the local Urban League and the New Jersey Division of Civil Rights to arrange to work cooperatively in order to disseminate fair housing information, including information about the New Jersey Law Against Discrimination.

The County will work to assist residents with special needs to ensure they have full access to housing and needed services.

Impediment II – 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's fair housing complaint system. In addition, the process to file a fair housing complaint is 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

The County will work to raise the visibility of Fair Housing and the Fair Housing Complaint Process, including increasing landlord and resident awareness and knowledge of Fair Housing. The County will implement a local fair housing counseling program including a referral service to appropriate State and federal enforcement agencies for enforcement of fair housing laws.

The County's Fair Housing Officer will work with the regional fair housing agency and/or the State of New Jersey Regional Fair Housing Office to plan and conduct presentations and distribute information about fair housing, through elementary schools, public libraries, affordable housing providers and community/recreation centers. This includes the State of New Jersey Regional Fair Housing Office located in Atlantic County, New Jersey, as well as the local HUD-approved Counseling Agencies.

The County will also provide, from the Office of Landlord/Tenant Information, within the New Jersey Department of Community Affairs' Division of Codes and Standards, the ***Truth-in-Renting*** publication that serves as a guide to the rights and responsibilities of residential landlords and tenants in New Jersey.

Impediment III – Transportation Availability and Access to Jobs

From an economic development standpoint, Gloucester County is strategically located between Boston and DC, with access to the Walt Whitman and Commodore Barry Bridges, the Philadelphia International Airport, the NJ Turnpike, and Interstate Routes 295 and 95. Approximately one-third of the County's residents commute to work in Philadelphia or Camden County. The major transportation links bring the

millions of people in the Boston- New York - Washington Richmond corridor within a four-hour drive, or half-day delivery, and national and international markets within overnight shipping.

One major reason for the continued growth in the County has been its vehicular transportation spine. The transportation network within the region is largely north-south with growth coming along and between the County's four major transportation corridors. Interstate Route 295 and the New Jersey Turnpike provide north south-interstate connections, with State Highways 55, 47 and 49 linking the southern communities through the center of the County. The Atlantic City Expressway brings the shore communities and its employment opportunities within easy driving time for County residents.

Four branches of Conrail provide rail service to the major industrial parks in the County and to areas to the south and east. The Philadelphia International airport and the Atlantic City airport as well as two commercially licensed airports in the County facilitate air transportation.

Commuter rail is also proposed along the PATCO Glassboro-Camden Line (GCL). The proposed 18-mile GCL traverses established communities and would provide a new reliable transit system linking activity centers, employment designation and established residential areas.

From 2003 to 2008, the county's civilian labor force expanded by 13,900 or 9.8 percent, over three times faster than the state's rate of growth (+3.0%). An influx of new residents and the growth of job opportunities helped fuel this expansion.

Manufacturing employment in the county increased by 7.4 percent, in contrast to statewide manufacturing jobholding which declined at a rate of 14.2 percent. Gloucester businesses that added workers included producers of food products, machinery, printed items as well as plastics and rubber goods. The county is home to 21 industrial parks covering 6,300 acres.

In the County, educational and health services employment increased by 29.9 percent, a rate more than twice that realized by the state (12.1%). Most of the new jobs were at outpatient centers, hospitals, and facilities that care for the elderly.

From 2002 to 2007, Gloucester County's annual average private sector wage increased by 18.0 percent, slightly less than the state's gain of 19.4 percent. The County's annual average private sector wage in 2007 was 72.1 percent of the state's average (\$53,594). Among the state's 21 counties, Gloucester had the state's sixth lowest average annual private sector wage. This is partly because the County has few office parks or large business headquarters operations which typically have high skills requirements for employees and therefore pay higher wages.

In 2007, the industry sector with the highest annual wage was manufacturing (\$60,114). Manufacturing jobs paid relatively well compared to the average job in Gloucester County because many of these positions are specialized production jobs in oil refineries, and chemical plants which pay higher wages than most plants.

Actions to Address Impediment III

The County will continue to work with its local paratransit and County agencies to ensure adequate access to local and County-wide employment, as to foster equitable accessibility and mobility throughout the County and region. Aggressive marketing of transit opportunities and connections to

centers of activity (employment, cultural, residential, etc.) should also be explored to address these impediments and enhance the quality of life for County residents.

Impediment IV – Bias in Lending

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

Local credit and budget counseling is now available to residents of Gloucester County through the Consumer Credit Counseling Service of the Delaware Valley and Tri-County Community Action Partnership. The County will work with these two agencies to ensure their services are marketed and accessible to the residents of the County.

Impediment V – Lack of Decent Affordable Housing

Approximately 35% of the County's households are at 80% or less of the Area Median Income, suggesting that the County 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.

Action to Address Impediment V

To the extent that resources are available, the County will continue to maintain existing affordable housing through the residential rehab activities operated by the Division. The County will also continue to support the creation of new affordable units through technical assistance and subsidies to housing developers, both for-profit and non-profit, who are producing affordable housing.

Sources of funding for these activities include CDBG, HOME, municipal Affordable Housing Trust Funds and, potentially, the State's Affordable Housing Trust Fund. The Trust Fund was established according to NJ Council on Affordable Housing (COAH) regulations. Most of COAH's regulations and practices, including those governing Housing Trust Funds, are currently the subject of litigation and Legislative review, so the use of Trust Funds monies is uncertain at this point. However, it is anticipated that the eventual outcome of these revisions will be to allow use of Trust Fund monies for the support of affordable housing throughout the County and the State.

Incentivizing affordable housing production, which has been authorized by the New Jersey Appellate Division, allows municipalities to provide a "compensatory benefit" to provide development incentives "sufficient" to generate a realistic opportunity and compensate for the affordable housing requirement. Basic methods of providing affordable housing include inclusionary zoning or using Payments in Lieu (PIL), as well as other mechanisms identified in the County's COAH Plan. To the extent feasible, the County will consider those projects receiving these municipally-driven economic incentives in order to create a realistic opportunity for the production of affordable housing, including but not limited to, easing density and density-related restrictions, easing non-density-related restrictions and /or providing direct or indirect fiscal subsidies.

Additionally, the County also works with and supports the Gloucester County Housing Authority, as well as local CHDOs, in its efforts to expand its inventory of affordable units and will continue to do so.

Impediment VI – Availability of Housing for the Disabled

The 2005-2007 American Community Survey (U.S. Census) reported 32,834 disabled persons within Gloucester County, representing 12.5 percent of the population, thus making it difficult to produce or retrofit accessible housing supply to meet the County's high demand.

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.

A record 10,552 fair housing discrimination complaints were filed Nation-wide in fiscal year 2008. The report shows that a large portion of the complaints, 44 percent, were filed by persons with disabilities. Therefore, this impediment becomes even more significant for Gloucester County and its disabled population.

Action to Address Impediment V

Gloucester County will continue to utilize Federal funding via the Community Development Block Grant (CBDG) and/or HOME programs to ensure that developers and builders conform to the Uniform Federal Accessibility Standards (UFAS) that require that 5% of the units be accessible and 2% be accessible for persons with hearing or visual disabilities. The County will also continue to monitor the use of the Low Income Housing Tax Credit (LIHTC) program to monitor use of project development subsidies for the Special Needs Cycle set-aside required in NJHMFA's Qualified Allocation Plan and the allocation of LIHTCs to sponsors who provide housing for persons with developmental disabilities for projects which have been recommended by the Division for Development Disabilities (DDD).

While New Jersey's Law Against Discrimination (LAD) provides that a landlord in an existing building is not required to modify the property to provide assistance to a person with a disability, the landlord is prohibited from charging extra fees for any accommodations provided to a person with a disability.

II. GLOUCESTER COUNTY DEMOGRAPHIC BACKGROUND DATA

A. DEMOGRAPHIC DATA

In this section of the *Analysis of Impediments to Fair Housing*, demographic and socio-economic characteristics of the County are described to identify conditions and trends within the County. 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 and the County's Five Year Consolidated Plan.

Gloucester County is comprised of 24 communities covering 325 square miles in southwestern New Jersey. Approximately twenty percent of the County is developed, and almost forty percent of the area is either vacant, wooded, or in agricultural use according to recent figures from the County's

Department of Economic Development. The County is located five miles south and east of Philadelphia across the Delaware River. Ten miles to the south-southeast is Wilmington, Delaware. It is forty-five miles east of Atlantic City and the New Jersey shore. Cumberland and Atlantic counties border its southern and southeastern edges, while Camden County and the Delaware River form the border to the west-northwest. Salem County forms its southwestern border. With all these location advantages, Gloucester County also has the largest amount of developable land in the Delaware Valley Region.

From an economic development standpoint, Gloucester County is strategically located between Boston and DC, with access to the Walt Whitman and Commodore Barry Bridges, the Philadelphia International Airport, the NJ Turnpike, and Interstate Routes 295 and 95. Approximately one-third of the County's residents commute to work in Philadelphia or Camden County. The major transportation links bring the millions of people in the Boston- New York - Washington Richmond corridor within a four-hour drive, or half-day delivery, and national and international markets within overnight shipping.

The fastest-growing municipality in the state since 2000 has been Gloucester County's Woolwich Township which expanded at the rate of 202.6 percent. Woolwich (+6,142), Washington (+4,923) and Monroe (+3,982) townships are the three Gloucester County municipalities that added the most residents since 2000. These are all located near major interstate highways which make commuting to employment centers in areas outside of the county convenient for residents.

The NJ Department of Labor had projected (Projections 2014), Gloucester County to increase the number of employed from 113,050 in 2004 to 127,900 by 2014, but according to the 2006-2008 ACS-Year Estimate that figure already exceeds \$145,000.

One major reason for the continued growth in the County has been its vehicular transportation spine. The transportation network within the region is largely north-south with growth coming along and between the County's four major transportation corridors. Interstate Route 295 and the New Jersey Turnpike provide north-south-interstate connections, with State Highways 55, 47 and 49 linking the southern communities through the center of the County. The Atlantic City Expressway brings the shore communities and its employment opportunities within easy driving time for County residents.

Four branches of Conrail provide rail service to the major industrial parks in the County and to areas to the south and east. The Philadelphia International airport and the Atlantic City airport as well as two commercially licensed airports in the County facilitate air transportation.

The population of the County reached 254,673 in 2000, an increase of 24,591 (10.6%) from the 1990 census figure. According to the 2006-2008 ACS the population has risen to 284,886 or 11.9% since 2000. As the trend toward growth has continued since the 2000 census, and projections for housing growth, for example, predict that the five fastest growing municipalities in the County will each grow by over 100 percent by 2020.

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

Racial Composition (Percentage)

	Gloucester County	NJ	US
White	87.1 / 82.8	72.6 / 62.0	75.1 / 65.9
African American	9.1 / 9.5	13.6 / 13.0	12.3 / 12.1
Native American	0.2 / 0.1	0.2 / 0.1	0.9 / 0.7
Asian	1.5 / 2.3	5.7 / 7.4	3.6 / 4.3
Pacific Islander	- / -	- / -	0.1 / 0.1
Other Race	0.9 / 0.1	5.4 / 0.4	5.5 / 0.2
Two or More Races	1.3 / 1.6	2.5 / 1.2	2.4 / 1.6
Hispanic (any race)	1.6 / 3.7	13.3 / 15.9	12.5 / 15.1

** Based on 2000 Census / Based on 2006-2008 American Community Survey 3-Year Estimates*

The highest ratios of African American (above 21%) are concentrated in the Borough of Paulsboro, and sections of the City of Woodbury, the Borough of Glassboro and Deptford Township. The Hispanic population is concentrated (above 5%) in Swedesboro and sections of Deptford Township and the Borough of Glassboro, while the Asian population is highest (above 3%) in portions of Deptford Township, and Washington Township.

The table below shows the age cohort of the County population. Gloucester County reflects the state and national figures for the age of its population, as the table below indicates. The working age cohort (20 to 64) ratio is slightly higher than the state or national percentage. The percentage of elderly (65+) and extra elderly (75+) are lower than the national and state percentages.

The relative lack of diversity is manifest in other types of statistics. Only 7.4 percent of persons in Gloucester County speak a language other than English, compared to 27.6 percent for New Jersey and 19.6 percent for the nation. Only 4.5 percent of the County population is foreign-born; this compares to 12.5 percent for the United States and 19.8 percent for the state of New Jersey.

Age Cohorts

	Gloucester #	Gloucester %	NJ%	US%
Under 5	16,689	6.6 / 6.0	6.7 / 6.4	6.8 / 6.9
5 to 19	57,640	22.6 / 20.4	20.4 / 20.0	21.8 / 20.6
20 to 64	150,666	59.1 / 61.9	59.6 / 60.5	58.9 / 59.9
65 to 74	16,083	6.3 / 6.1	6.8 / 6.6	6.5 / 6.5
75 & over	13,595	5.3 / 5.6	6.4 / 6.5	5.9 / 6.1
Median Age	-	36.1 / 37.4	36.7 / 38.5	35.3 / 36.7

** Based on 2000 Census / Based on 2006-2008 American Community Survey 3-Year Estimates*

The highest concentrations of elderly (above 20%) are in portions of the City of Woodbury, Deptford Township, Washington Township, the Borough of Pitman and Monroe Township, with the “below 5” population being highest (above 8%) in Logan, Woolwich and Harrison Townships and portions of the Borough of Glassboro and Mantua and Monroe Townships.

The table below shows the educational attainment of the County population. The population of Gloucester County has a good level of educational attainment. The percentage of persons lacking a 9th grade education is well below the state and national figures, and the percentage of persons with a high

Comparative Growth in Income

	1990 Median Family Income	2000 Median Family Income	Percent Change	1990 Median Household Income	2000 Median Household Income	Percent Change
Gloucester County	\$44,216	\$62,336	40.9%	\$39,387	\$54,152	37.4%
State of New Jersey	\$47,589	\$64,907	36.3%	\$40,927	\$55,083	36.1%
Nation	\$35,225	\$50,046	42.1%	\$30,056	\$41,994	39.7%

Source: U.S. Bureau of the Census, 1990, 2000

According to 2006-2008 ACS data, the per capita income in Gloucester County is \$30,893, which is above the US average and above New Jersey's per capita income of \$27,006. In 2006-2008, 8.0 percent of people were living in poverty in Gloucester County, which is below the State average of 8.5 percent and the national average of 12.4 percent. Nine percent of related children under 18 were below the poverty level, compared with 10 percent of people 65 years old and over. Six percent of all families and 23 percent of families with a female householder and no husband present had incomes below the poverty level.

These low income figures mean that it is more difficult for households to meet monthly expenses, especially when housing costs more than 30% of their income, more difficult to save for a down payment for a home, and more difficult to qualify for a mortgage to purchase home, especially in light of the rising prices of housing and the tight housing market.

As the Housing Market Analysis table shows, the Fair Market Rent for even the smallest unit is above the affordable rent for households at 50% of MFI. Figures from the National Low Income Housing Coalition indicate that a minimum wage worker would have to work almost 100 hours per week to afford a one-bedroom apartment, and that the wage required to afford a two-bedroom apartment at the area's fair market rent would be \$15.25.

C. EMPLOYMENT DATA

During the period from 2003 to 2008, Gloucester County's annual average unemployment rate remained below or at the state's rate. From 2007 to 2008, the unemployment rate rose from 4.3 percent in 2007 to 5.5 percent in 2008 in both the county and the state. This was the largest over-the-year increase during the 5-year period (+1.2%) and was due to the recession which began in December 2007. Since the beginning of the recession, Gloucester County's unemployment rates have grown as high as 11.2% but are starting to drop, along with the State's rate, throughout 2010.

New Jersey Department of Labor and Workforce Development
Labor Planning and Analysis
Labor Market and Demographic Research
Bureau of Labor Force Statistics

2009 Benchmark (Not Seasonally Adjusted)
June 21, 2010

NEW JERSEY
LABOR FORCE ESTIMATES* FOR 2010 BY AREA
*** Numbers may not add due to rounding**

COUNTY/LABOR AREA	JAN	FEB	MAR	APR	MAY
Gloucester County, NJ					
PS340350					
Labor Force	159,800	161,100	160,500	160,300	160,100
Employment	142,300	143,100	143,100	144,000	144,000
Unemployment	17,600	18,000	17,400	16,300	16,200
Unemployment Rate (%)	11.0	11.2	10.8	10.2	10.1
New Jersey					
ST340000					
Labor Force	4,515,800	4,559,000	4,550,900	4,541,700	4,541,700
Employment	4,051,000	4,088,300	4,086,500	4,105,700	4,108,000
Unemployment	464,800	470,700	464,500	436,000	433,800
Unemployment Rate (%)	10.3	10.3	10.2	9.6	9.6

From 2003 to 2008, the county's civilian labor force expanded by 13,900 or 9.8 percent, over three times faster than the state's rate of growth (+3.0%). An influx of new residents and the growth of job opportunities helped fuel this expansion.

In 2008, Gloucester County residents claiming unemployment benefits through the State of New Jersey were relatively young, with greater proportions under 25 years old (11.9%) and between the ages of 25 and 44 (48.6%) than in the state (10.2% and 46.3%, respectively).

The number of claimants living in the county increased by 8.0 percent between 2007 and 2008, a smaller increase than for the state (12.9%). During this time, the county registered declines in the number of claimants most recently employed in wholesale trade (-5.2%), manufacturing (-3.3%) and construction (-1.7%).

In Gloucester County, private sector jobs covered by unemployment insurance increased by 14.2 percent from 2002 to 2007, compared with a 2.3 percent increase for the state. Of the state's 21 counties, Gloucester ranked first in the rate of job creation over the 2002-2007 period. The county recorded employment increases each year from 2002 to 2006 when payrolls peaked before declining slightly in 2007. Construction payrolls in the county rose at almost twice the rate of the state (+12.1% vs. +6.7%) between 2002 and 2007. Much of this increase was due to the construction of large subdivisions of expansive single-family homes. In 2007, East Greenwich, Monroe and Harrison townships ranked 4th, 19th and 21st respectively among the state's 566 municipalities in the total value of single family homes authorized by building permits.

Manufacturing employment in the county increased by 7.4 percent, in contrast to statewide manufacturing jobholding which declined at a rate of 14.2 percent. Gloucester businesses that added workers included producers of food products, machinery, printed items as well as plastics and rubber goods. The county is home to 21 industrial parks covering 6,300 acres.

In the county, educational and health services employment increased by 29.9 percent, a rate more than twice that realized by the state (12.1%). Most of the new jobs were at outpatient centers, hospitals, and facilities that care for the elderly.

From 2002 to 2007, Gloucester County’s annual average private sector wage increased by 18.0 percent, slightly less than the state’s gain of 19.4 percent. The county’s annual average private sector wage in 2007 was 72.1 percent of the state’s average (\$53,594). Among the state’s 21 counties, Gloucester had the state’s sixth lowest average annual private sector wage. This is partly because the county has few office parks or large business headquarters operations which typically have high skills requirements for employees and therefore pay higher wages.

In 2007, the industry sector with the highest annual wage was manufacturing (\$60,114). Manufacturing jobs paid relatively well compared to the average job in Gloucester County because many of these positions are specialized production jobs in oil refineries, and chemical plants which pay higher wages than most plants.

D. 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 percent of median family income (MFI)
- Very Low-income households: those earning between 31 and 50 percent of MFI
- Low-Income households: those earning between 51 and 80 percent of MFI
- Middle-income households: those earning between 81 and 95 percent of MFI

According to HUD’s **State of the Cities Data Systems (SOCDS): Comprehensive Housing Affordability Strategy (CHAS) Data (2000)**, 89,203 households reside within Gloucester County. While 2009 Claritas data estimates that there are approximately 105,410 households within the County, SOCDS CHAS data will be used to assess the County’s housing and community development needs for the County’s 2010-2014 Consolidated Plan. More precise estimates will be made available after the 2010 Census data is released; therefore, the County will utilize the SOCDS CHAS data for the purposes of this assessment.

Of the 89,203 households within the County, 71,616 or 80.3 percent were owner-occupied households and 17,587 or 19.7 percent constituted of renter-occupied households.

The table below shows the breakdown of the number of households by income level:

Households by Income	
<30% MFI	7,722

30 to 50% MFI	8,091
50 to 80% MFI	14,951
>80% MFI	58,439
TOTAL HH	89,203

HUD's 2010 Income Limits Fact Sheet provides that the median family income for Gloucester County, which is part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Statistical Area (MSA), is \$78,300.00. The distribution of household income in Gloucester County indicates that a majority of the County's households are in the two highest-income categories – Moderate- and Middle-income groups. Per the 2000 CHAS data, 7,722 (or 8.7 percent) and 8,091 (or 9.0 percent) were identified as either Extremely Low- or Low-Income population groups, respectively. Therefore, only 17.8 percent of County households are eligible for some form of Federal, State or municipal government assistance.

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 one- and two-member households;
- 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.

The table below examines the owner and renter households by type.

	Renter	Owner	TOTAL
Elderly	3,349	15,383	18,732
Small	6,833	38,952	45,785
Large	1,266	9,431	10,697
Other	6,139	7,850	13,989
TOTAL	17,587	71,616	89,203

Elderly households constitute 20.0 percent of households, Small Related households 52.0 percent, Large Related households 12.0 percent and the Other households 16.0 percent. Overall, Small Related households make up a majority of the County's renter-occupied and owner-occupied housing stock.

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, 16.8 percent (2,955) of all renter-occupied households and 7.0 percent (5,371) of owner-occupied households are experiencing Severe Cost Burdens.

General Housing Cost Burdens (greater than 30.0 percent) are prevalent amongst the County's renter-occupied households, where 36.0 percent (6,366) of all renter-occupied households experience a

General Housing Cost Burden. Approximately 24.0 percent of owner-occupied households experience a General Housing Cost Burden. While this represents a smaller percentage of that tenure group, approximately 17,402 households make up that 24.0 percent – representing a significant amount.

Small Related households represent the majority of the Severe Cost Burden (1.024) for renter-occupied households. However, Elderly households experience the majority of the Severe Cost Burden for owner-occupied households (2,030). Similar to National Baby-boomer trends, owner-occupied Elderly households are expected to sustain demand for housing as they increase spending on home remodeling (i.e., renovations such as elevators designed to allow them to age in place) and even the purchase of new, trade-up, and second homes. However, national, state, and local efforts are needed to ensure that housing affordability is maintained for Elderly low- and Low-Income households.

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

- Physical defects (lack of kitchen or bathroom);
- Overcrowding (more than one (1) persons per room); and
- Housing cost burden or severe housing cost burden.

CHAS data indicates that 31.5 percent of renters experience one of the aforementioned housing problems. Approximately, 25.2 percent of owner-occupied households experience at least one housing problem. Overall, 28.1 percent (25,026) of all occupied households experience one or more housing problems. Surprisingly, 46.8 percent (11,717) of these households are within the upper-income stratum (Moderate- and Middle-Income) of owner-occupied households. While most data reflects housing burden trends to primarily affect the lower-income stratum of households, the County’s CHAS data is most likely reflecting of the age of the County’s housing stock, increased costs of living and the significant population growth that the County has experienced in the last two decades.

An overview of the City’s households by tenure type reveals that the Small Related households constitute a significant portion of the total households and have the greatest number of problems.

HOUSEHOLDS BY TENURE

Renters – 17,587	
Greatest Number of HH	Small Related – 6,833
Group w/ highest % of Problems	Large Related – 53.5%
Group w/ greatest # of Problems	Small Related – 2,466
Greatest Problem - Cost Burden >30%	

Owners – 71,616	
Greatest Number of HH	Small Related – 38,952
Group w/ highest % of Problems	Other – 36.5%
Group w/ greatest # of Problems	Small Related – 7,868
Greatest Problem - Cost Burden >30%	

Extremely Low Income (Below 30% MFI)

According to the 2000 SOCDs CHAS data, approximately 8.7 percent of all Gloucester County households

were considered Extremely Low-income. HUD’s 2010 Income Limits Fact Sheet provides that the median family income for Gloucester County, which is part of the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA, is \$78,300.00. Accordingly, households within this income group would typically earn the following:

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA								
Household Size (Person)	1	2	3	4	5	6	7	8
Extremely Low-Income	\$16,450	\$18,800	\$21,150	\$23,500	\$25,400	\$27,300	\$29,150	\$31,050

This income group tends to experience the most distressed housing conditions. In fact, 78.9 percent of all Extremely Low-income households have at least one housing problem. Of the households (6,092) that experience at least one housing problem, approximately 3,100 of these households are renter-occupied and 2,991 of these households are owner-occupied.

Overall, about 54.3 percent of Extremely Low-income renter households are experiencing a severe housing cost burden and 71.1 percent are encountering at least one major housing problem, such as substandard conditions or overcrowding.

According to the SOCDs CHAS data, Elderly renter-occupied households dominate Extremely Low-income category. The data demonstrates that one-third, or 33.0 percent (1,058), of all renter-occupied households are categorized as Elderly and dominate the renter-occupied, Extremely Low-Income stratum. Similarly, nearly 56.0 percent (1,935) of owner-occupied households are also categorized as Elderly. Of these Elderly, Extremely Low-Income homeowners, nearly 88.0 percent (1,704) experience at least one housing problem; whereas, nearly 60.0 percent experience a Severe Housing Burden.

About 43.2 percent of all Extremely Low-income homeowner households are elderly – representing the largest faction within this category. However, Large Related households represent the greatest percentage of problems at 96.0% for renter-occupied households and 93.2% for owner-occupied households – which is most likely due to fiscal constraints related to the size of the household.

The following charts analyze the composition of the income levels per the CHAS data:

HHI<30% MFI

7,722= 8.6% of County HH

Renters - 4,264	
Greatest Number of HH	Elderly - 1,405
Group w/ Highest % of Problems	Large Related - 96.0%
Group w/ greatest # of Problems	Other – 1,043
Greatest Problem - Cost Burden >30%	
Owners - 3,458	
Greatest Number of HH	Elderly – 1,935
Group w/ Highest % of Problems	Large Related - 93.2%
Group w/ greatest # of Problems	Elderly - 1,704

Greatest Problem - Cost Burden >30%

Owners – 4,904	
Greatest Number of HH	Elderly – 2,887
Group w/ Highest % of Problems	Other - 93.6%
Group w/ greatest # of Problems	Elderly - 1,636
Greatest Problem - Cost Burden >30%	

The most prevalent problem for households in this income range is cost burden >30 percent for small-related renter households and elderly owner households.

Many Very Low-income renter households pay housing costs that exceed the 30-percent affordability threshold. Although substantially fewer of these households have severe housing cost burdens, other problems such as overcrowding and substandard conditions are prevalent. Overcrowding may be a particular concern for Large Related renter households in this income category.

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

According to the 2000 SOCDS CHAS data, *approximately 9.0 percent of all Gloucester County households were considered Very Low-income.* HUD’s 2010 Income Limits Fact Sheet provides that households within this income group would typically earn the following:

Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA								
Household Size (Person)	1	2	3	4	5	6	7	8
Low-Income	\$43,900	\$50,150	\$56,400	\$62,650	\$67,700	\$72,700	\$77,700	\$82,700

Low-Income households are far less likely to experience housing problems than are the owner and renter households in the extremely low- and low-income categories. Only 44.3 percent of all Low-Income households reported having a housing problem according to the SOCDS CHAS data, with 44.2 percent reporting a cost burden and 9.2 percent reporting a severe cost burden.

While in comparison, Low-Income households tend to experience less housing problems than Extremely- and Very Low-Income households, Low-Income renters experience far less housing problems than Low-Income homeowners in Gloucester County. SOCDS CHAS data demonstrates that Small Related renter- and owner-occupied households tend to experience the majority of housing problems and burdens within this income category.

Of the 4,051 Low-Income renter-occupied households, nearly 42.0 percent (1,686) of these households are dominated by Small Related households. While Large Related households have the highest percentage of problems, Small Related households are make up a majority of those households that experience the greatest number of problems with 507 Small Related households experiencing at least one housing problem.

Low-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 Low-Income households to seek housing

elsewhere. It may be viable for the County to utilize market value analyses to create a data driven framework for restoring market viability and wealth in distressed urban real estate markets, or for those areas on the verge of such distress. Market value analyses are designed to help governments and private investors target investment and prioritize action in ways that can leverage investment and revitalize neighborhoods.

HHI >50% to <=80% MFI **14,951 HH = 16.7% of County HH**

Renters – 4,051	
Greatest Number of HH	Small Related - 1,686
Group w/ Highest % of Problems	Large Related - 46.5%
Group w/ greatest # of Problems	Small Related - 507
Greatest Problem - Cost Burden >30%	

Owners - 10,900	
Greatest Number of HH	Small Related - 4,332
Group w/ Highest % of Problems	Other - 74.3%
Group w/ greatest # of Problems	Small Related - 2,633
Greatest Problem - Cost Burden >30%	

The most prevalent problem among households in this income range is cost burden >30 percent among small-related renters and small-related owners. In fact, cost burdens greater than 50% are insignificant for both renter- and owner-occupied households within the Low-Income category, at 2.5 percent and 11.7 percent respectively.

Affordability is a less significant problem for Low-Income households generally; the incidence of severe housing cost burdens is significantly less for every category of households when compared to Extremely- and Very Low-Income households. Of all households, Low-Income Small Related owner-households experience the most severe cost burdens with 589 households.

Middle Income (Greater than 80% and less than 120% MFI)

According to the 2000 SOCDS CHAS data, *approximately 65.5 percent of all Gloucester County households were considered Middle-income, which represents a majority of the County's households.* HUD's 2010 Income Limits provides that the Median Family Income for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA is \$78,300.00.

HHI >80% MFI **59,439 HH = 65.5% of County HH**

Renters – 6,085	
Greatest Number of HH	Small Related - 2,633
Group w/ Highest % of Problems	Large Related - 22.8%
Group w/ greatest # of Problems	Small Related - 109
Greatest Problem - Cost Burden >30%	

Owners – 52,354	
-----------------	--

Greatest Number of HH	Small Related - 32,692
Group w/ Highest % of Problems	Other - 20.9%
Group w/ greatest # of Problems	Small Related - 3,661
Greatest Problem - Cost Burden >30%	

An overwhelmingly 89.5 percent of Middle-Income households are homeowners. For renters, affordability doesn't appear to be a significant issue, with the exception for some Small Related households.

The most prevalent problem among the households at this income level appears to be overcrowding among the Large Related households though cost burdens >30 percent is a significant problem among Small Related households. Overcrowding and substandard housing conditions tend to afflict Large Related renter-occupied households. Approximately 22.8 percent of all renter households that report at least one housing problem are Middle-Income Large Related.

Overall, the majority of Middle-income households is able to avoid experiencing housing problems and even cost burdens. This finding suggests that, with possible exceptions of Large Related renter households, Middle-income households are capable of locating decent and affordable housing in the Gloucester County housing market area.

Overall, affordability is a problem for a smaller segment of Middle-income homeowners, and severe affordability problems are manageable within the Middle-Income group. Approximately, 10.3 percent of all Middle-Income households experience a cost burden greater than 30%. Less than 1.0 percent (0.6 percent) experience severe cost burdens.

Households with Mobility and Self Care Limitations

An analysis of households with mobility and self care limitation reveals that 17.4 percent of the County's total households reported some type of mobility or self-care limitation in the 2000 U.S. Census. Nearly one-third of these households (32.2%) have income less than 50 percent of the Median Family Income. The numbers of households at the lowest income level is almost evenly split between owner and renter households (2,734 owner v. 2,360 renters). However, as income levels rise, the difference between the number of renter and owner households rises markedly and the total number renter households with mobility problems (3,787) is about one-half the total number of owner households (7,350). The number of households (renter vs. owner) reporting problems provides the same proportion.

The table below shows the numbers of households by household type. Other households constitute the largest group, 60.5 percent of all households with mobility problems. The Extra Elderly represent 20.9 percent of total households with mobility problems and owner households constitute 73.8 percent of Extra Elderly. In the same way, elderly owner households constitute 76.6 percent of Elderly households with mobility problems.

**Households with Mobility & Self-care Limitations
By Type By Household**

	Renter	Owner	Total
Extra Elderly	869	2,454	3,323
Elderly	678	2,244	2,922
Other	2,240	7,350	9,590
Total	3,787	12,048	15,835

Source: 2000 U.S. Census

Thus, while there are significant numbers of the elderly and extra elderly with housing problems, by far the greatest number of reported problems lie with the Other households and Other Owner households in particular.

Overcrowding

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

An analysis of 2006-2008 American Community Survey (ACS) data, as provided by the U.S. Census Bureau, on overcrowding throughout the County revealed that overall 1.3 percent of households were living in overcrowded conditions. This represents 1,187 housing units. Of these 1,187 units, 970 (1.1 percent) of these units experienced overcrowding at 1.01 to 1.50 occupants per room, while 217 units (0.24 percent) experienced overcrowding at 1.51+ occupants per room.

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 or three families living in one 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 County definition of substandard housing is a housing unit with one or more serious code violations. For the purposes of this analysis the County will also use the lack of a complete plumbing or a complete kitchen as an indicator of substandard housing, as provided by the 2006-2008 ACS data.

2006-2008 ACS data reported that there were 261 housing units within the County that lacked complete plumbing and 299 units that lacked a complete kitchen. Assuming that these units do not overlap, there were 560 substandard units within the County, by this definition. This represents less than 1.0 percent of the total housing units within the County. Thus, substandard housing is not a major concern in Gloucester County.

Median Sales Prices for Housing in Gloucester County

According to the National Association of Realtors, median sales prices of existing single-family homes in the two metropolitan areas bordering Gloucester County (the Atlantic County and Philadelphia-Camden-Wilmington metropolitan areas) increased between the first and third quarters of 2009. By the end of the third quarter, however, median sales prices had dropped substantially lower than 2008 price levels and had remained lower than prices in the Northeast region. This pattern was characteristic of the single-family market in both the region and the nation as a whole.

**Median Sales Prices of Existing Single-Family Homes
2006 through Third-Quarter 2009**

	2006	2007	2008	2009		
				1Q	2Q	3Q
United States	221.9	217.9	196.6	167.3	174.2	177.9
Northeast Region	280.3	288.1	271.5	235.2	245.8	244.5
Atlantic County Metropolitan Area	254.8	269.7	253.3	219.1	218.7	223.0
Philadelphia-Camden- Wilmington Metropolitan Area	230.2	234.9	231.4	206.0	211.0	227.5

Source: National Association of Realtors

The demand for housing in New Jersey has been consistently high for the last decade, driving prices upward in the process. The median sale price for an existing home in Gloucester County was \$186,000 in the third quarter of 2009 according to the Boxwood Means, Inc. Like median sales prices, the actual number of home sales declined, as a result of the subprime mortgage lending crisis and the economic recession.

Median Sales Price	2008	2009 Q1	2009 Q2	2009 Q3
	\$200,000	\$183,500	\$185,000	\$186,000

Number of Home Sales	2008	2009 Q1	2009 Q2	2009 Q3
	3,751	524	966	1,234

The demand for affordable housing for low- and moderate-income households has been persistent. The Housing Market Analysis worksheet shows that the overall vacancy rate for rental units is a very low (1.0 percent), and that the rate for sale units is the same.

Among rental units affordable to Extremely Low-, Very Low- and Low-Income households, 22.0, 32.5 and 57.8 percent of units, respectively, were occupied by persons to whom these units were affordable, indicating a shortfall of some 12,974 affordable units at these income levels (owner- and renter-occupied units combined). 2000 SOCDS CHAS data documented that over 36.2% of the County's renter-occupied households were cost burdened. This means that renters in all income categories were paying greater than 30% of monthly income for shelter costs. Approximately, 3,021 Extremely Low-, 2,167 Very Low- and 1,069 Low-Income renter-occupied households experienced cost burden. Without some type of rental assistance, a portion of the population (approximately 6,257 households) are in danger of homelessness.

	Total Households	Cost Burden	No Cost Burden	Affordability Need
Extremely Low-Income	7,722	78.0%	22.0%	1,699
Very Low-Income	8,091	67.5%	32.5%	2,630
Low-Income	14,957	42.2%	57.8%	8,645

Total Affordable Housing Need				12,974
--------------------------------------	--	--	--	---------------

The median monthly housing costs for mortgaged owners was \$1,911, where as non-mortgaged owners had median monthly housing costs of \$735, and renters had median monthly housing costs of \$931. Overall, 40.0 percent of owners have mortgages, 26.0 percent of owners do not have mortgages, and 35.0 percent of renters in Gloucester County spent 30 percent or more of household income on housing.

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. Multi-family permit authorizations peaked in 2004 then dropped sharply in the following two years, with only 9,542 permits issued in 2006 and 7,269 issued during 2007.

Residential Building Permits Authorized, 2003-2009
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD
Units Authorized By Building Permits by Core Base Statistical Areas (CBSA's)
(Includes Permit Areas that only report once a year)

Type	2009	2008	2007	2006	2005	2004	2003
Single Family	4,963	7,269	9,542	11,717	15,041	15,504	15,367
Multi-Family	2,130	3,301	3,935	5,495	5,201	5,506	5,713
Total	7,093	10,570	13,477	17,212	20,242	21,010	21,080

Source: SOCDs Data Base at: <http://socds.huduser.org/permits/summary.odt>

Rental Housing and Housing Affordability

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

HUD Fair Market Rents, FY 2010

Area Jurisdiction	0-Bedroom	1-Bedroom	2-Bedroom	3-Bedroom
Gloucester County 2010	\$ 803.00	\$ 915.00	\$ 1,095.00	\$ 1,339.00

Source: US Department of Housing and Urban Development, National Low Income Housing Coalition

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 2010 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. As shown above, housing affordability would be a significant problem for families at the very low income level (fifty percent of area median), with incomes of \$39,150.00 or less.

**Rental Housing Affordability
Gloucester County**

	Gloucester County
Fair Market Rent for 2-Bedroom Apartment	\$ 1,095.00
Income Needed to Afford 2-BR apt at FMR	
Annual	\$ 43,800.00
Monthly	\$ 3,650.00
FY 2010 Median Family Income (HUD estimate)	
Area Median	\$ 78,300.00
HUD Income Limits	
Low Income/Family of Four (80% area median)	\$ 62,650.00
Very Low Income/Family of Four (50% area median)	\$ 39,150.00

Source: HUD data published by 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.

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 2005-2007 American Community Survey (U.S. Census) reported 32,834 disabled persons within Gloucester County, representing 12.5 percent of the population.

DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION

	Estimate	Margin of Error	Percent	Margin of Error
Population 5 years and over	262,770	+/-163	100%	(X)
With a disability	32,834	+/-1,594	12.50%	+/-0.6
Population 5 to 15 years	42,185	+/-458	100%	(X)
With a disability	1,991	+/-434	4.70%	+/-1.0
Population 16 to 64 years	189,260	+/-524	100%	(X)
With a disability	18,971	+/-1,291	10.00%	+/-0.7
Population 65 years and over	31,325	+/-210	100%	(X)
With a disability	11,872	+/-695	37.90%	+/-2.2

**U.S. Census Bureau ACS 2005-2007*

III. Evaluation of Current Fair Housing Profile

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.

A. EXISTENCE OF FAIR HOUSING COMPLAINTS

HUD’s Office of Fair Housing and Equal Opportunity (FHEO) receive complaints by households regarding alleged violations of the Fair Housing Act. Thirty seven (37) complaints were filed in Gloucester County. Most of the complaints (19) were based on discrimination related to race or color. Disability status also made up a majority (11) of County complaints. The table below identifies the basis for the complaint.

Title 8 complaint History since 2004

Gloucester County - Cases filed 2004 - Feb 2010									
City	Race/Color	National Origin	Familial status	Disability	Sex	Religion	Retaliation	Sexual Harassment	Total
Clayton	0	0	0	1	0	0	0	0	1
Deptford	0	2	0	2	0	0	0	0	4
Franklinville	0	0	0	1	0	0	0	0	1
Glassboro	2	0	0	0	0	0	1	0	3
Monroe Township	0	0	0	1	0	0	0	0	1
Mt. Royal	1	0	0	0	0	0	0	0	1
Mullica Hill	0	0	0	2	0	0	0	0	2

Newfield	1	0	0	0	1	0	0	0	2
Paulsboro	1	0	0	2	0	0	0	0	3
Pitman	1	2	0	0	0	0	0	0	3
Sewell	1	0	0	0	0	0	0	0	1
Turnersville	1	0	0	0	0	0	0	0	1
Wenonah	1	0	0	0	0	0	0	0	1
West Deptford	2	0	0	0	0	0	0	0	2
Westville	2	0	0	0	0	0	0	0	2
Williamstown	4	0	1	2	0	0	0	0	7
Woodbury	1	0	0	0	0	0	0	0	1
Woodbury Heights	1	0	0	0	0	0	0	0	1
Total	19	4	1	11	1	0	1	0	37

B. EXISTENCE OF FAIR HOUSING DISCRIMINATION SUITS

There are no Fair Housing discrimination suits that have been filed and are pending in the County of Gloucester.

IV. Identification of Impediments to Fair Housing Choice

This section of the *Analysis of Impediments to Fair Housing* will discuss the existing conditions within the County of Gloucester 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 County.

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

- A. Public sector actions; and
- B. Private sector actions.

Both of these areas will be discussed in order to determine the existence of any impediments to fair housing in Gloucester County.

A. 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 Gloucester County, and their constituent municipalities, 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:

- X 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;
- X Restrictive definitions of family that impede unrelated individuals from sharing a dwelling unit; and
- X 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) and not within the purview of the County.

The implementation of development standards sets minimum levels of protection for the public. However excessive street widths, parking requirements, curing 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.

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 Gloucester County is largely residential, there are some major commercial districts throughout the region and may provide some (but minor) tax relief to those municipalities with proportionally high property taxes.

Public Financing

For 22 years the County of Gloucester has funded a community development program with HUD CDBG and has funded community development programs through HOME funds for 18 years. 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 County. The community development program has served to benefit primarily low income persons in agreement with the statutory requirements.

The Gloucester County Department of Economic Development, Division of Housing and Community Development have had the responsibility of administering both the Community Development Block Grant (CDBG) Program and the HOME Investment Partnership (HOME) 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.

The Housing Authority of Gloucester has operated a First-time Home Buyers Program with American Dream Down-payment Initiative funds. Additionally, the Housing Authority of Gloucester County administers the Tenant Based Rental Assistance program.

In addition, through its continuing participation in the Comprehensive Emergency Assistance System (CEAS) Committee, the Division has been able to be part of the planning process for various human service programs as well as gather information and provide input on priority service and housing needs for both the Continuum of Care Plan and the Consolidated Plan.

The County ensures that regulations affecting CDBG funds Gloucester County's housing programs emphasize provisions of prioritized assistance to low-income households. The County's community development and housing programs are important in addressing the needs of low-income persons in the community.

B. Private Sector

Real Estate Practices

There are two local membership organizations for real estate brokers operating in Gloucester County to which Realtors within the County belong. Both the Gloucester County Board of Realtors (Board) 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.

Private Financing

Because credit history is a major reason for denial of home mortgage applications in the County of Gloucester 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.

According to 2008 HMDA data, 9,467 loans originated for the purposes of purchasing, refinancing and improving housing units at an aggregate amount of \$1,641,635,000.00. Approximately, 2,185 (31.35%) loans originated for the purpose of purchasing a home; 5,186 loans originated for the purpose of

refinancing a home; and 1,296 (13.69%) loans originated for home improvement. The median loan amount issued was approximately \$165,000.00.

In 2008, approximately 906 high-cost loans originated within the County. A loan is considered high-cost when there is a rate spread reported. The rate spread on a loan is the difference between the Annual Percentage Rate (APR) on the loan and the treasury security yield as of the date of the loan's origination. Rate spreads are only reported by financial institutions if the APR is three or more percentage points higher for a first lien loan, or five or more percentage points higher for a second lien loan. A rate spread of three or more suggests that a loan is of notably higher cost than a typical loan.

Of the 906 loans originated, approximately 270 high-costs loans (29.8%) were used for purchase (108 used for government-insured purchase and 162 used for conventional purchase). Approximately, 494 high-cost loans (54.5%) were issued for refinancing and 142 high-cost loans (15.6%) were used for home improvement. Of the total, nearly 73% of all high-cost loans were originated to White applicants.

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 County of Gloucester 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 County of Gloucester 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 County:

- Expand on-going housing education programs for housing providers, consumers, and local government officials about fair housing laws, rights, 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 County'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 County 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 County 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 County's website will provide information about the County's Consolidated Plan, One-Year Action Plan and Fair Housing Analysis and Officer Appointment. This is just one tool in improving the County's ability to communicate key housing, community development and fair housing information. It is helpful that the County will establish a point person to take fair housing inquiries.

The County must also raise its fair housing visibility through public outreach. The County 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 County, 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.

D. 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 Gloucester County. Additionally, the Secretary has not issued a charge under the Fair Housing Act regarding assisted housing in the County of Gloucester.

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 Stephen M. Sweeney
Freeholder Director, Gloucester County Board of Chosen Freeholders
Gloucester County, New Jersey

Date



Gloucester County

Analysis of Impediments *to fair housing*

we grow communities



New Jersey Office

1301 W Forest Grove Rd, Vineland, NJ 08360
P 856.690.9590 F 856.690.5622

Pennsylvania Office

309 W Glenside Ave, Glenside PA 19038
P 215.576.1950 F 215.576.1940

Web

www.triadincorporated.com