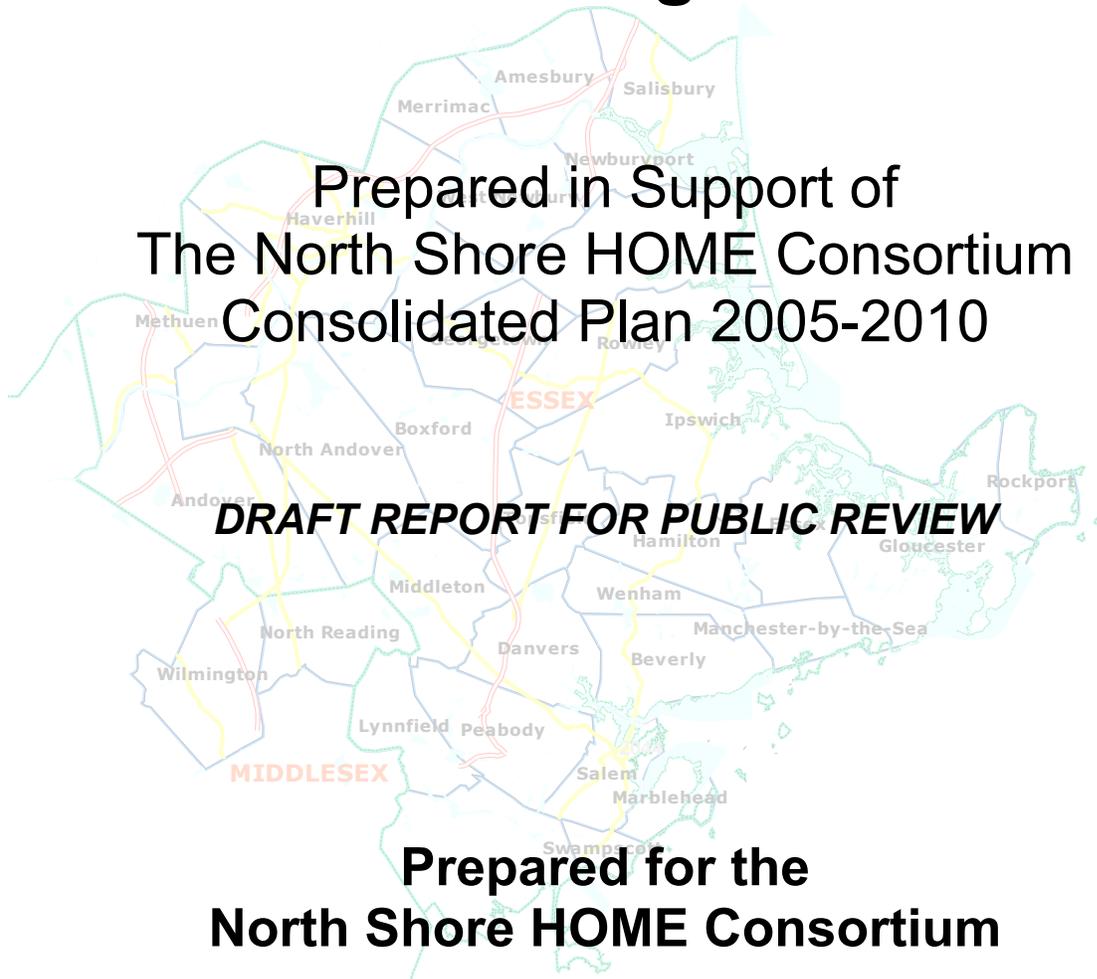


Analysis of Impediments To Fair Housing Choice

Prepared in Support of
The North Shore HOME Consortium
Consolidated Plan 2005-2010



DRAFT REPORT FOR PUBLIC REVIEW

Prepared for the
North Shore HOME Consortium

November 26, 2007

IF YOU FEEL THAT YOUR RIGHT TO FAIR HOUSING HAS BEEN VIOLATED

Persons who believe they have been discriminated against should contact The Fair Housing Center of Greater Boston:

By calling 617-399-0491; TTY users, please call the MA Relay Service at 1-800-439-2370.

By sending a fax to 617-399-0492.

By writing to: Fair Housing Center of Greater Boston
59 Temple Place #1105
Boston, MA 02111.

Or by sending an email to info@bostonfairhousing.org.
www.bostonfairhousing.org

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**Prepared for the
North Shore HOME Consortium**

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November 26, 2007

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EXECUTIVE SUMMARY

The Federal Fair Housing Act of 1968 made it illegal to discriminate in the area of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Familial status includes parents or legal guardians of minors under the age of 18. Disability covers physical and mental disabilities as well as people with AIDS or alcoholism.

In addition to prohibiting discrimination based upon federal laws, Massachusetts Fair Housing Law further prohibits discrimination based on marital status, sexual orientation, veteran status, blindness, age, ancestry, hearing impairment, or possession of an assistance dog, such as a guide dog or hearing dog.¹ Additionally, the law prohibits discrimination against individuals or families receiving public assistance or rental subsidies, or because of any of the requirements of these programs.

Provisions to affirmatively further fair housing are long-standing components of the United States Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from Section 808(e)(5) of the Federal Fair Housing Act, which requires the Secretary of HUD to administer HUD's housing and urban development programs in a manner which affirmatively furthers fair housing.

As part of the Consolidated Planning process, and as a requirement for receiving HUD formula grant funding, entitlement jurisdictions are required to submit to HUD certification that they are **affirmatively furthering fair housing**. This certification comprises three steps:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

OVERVIEW OF FINDINGS

The North Shore HOME Consortium service area tends to have a very low percentage of minority racial and ethnic populations. However, the distribution of this population indicates areas of very high concentrations within the North Shore. The same is true for both the disabled and lower income households. The North Shore HOME Consortium area does not have substantive housing condition problems. However, the increasing costs of housing are drastically outpacing any rises in household income.

Racial and ethnic minorities, especially blacks and Hispanics, face much higher rates of mortgage application denials for homeownership than do whites. These higher denial rates

¹ Massachusetts Fair Housing Act, G.L. Chapter 151B, 1;
http://www.massfairhousing.org/joomla/index.php?option=com_wrapper&Itemid=36

remained apparent even after comparing income across racial and ethnic groups. The reason most frequently given in loan application denials related to lack of sufficient quality in credit, though denial reasons appeared to be missing in greater frequency for selected minorities. Furthermore, the subprime lending market has expanded quickly over the last few years and tends to market more often to racial and ethnic minority householders.

Housing complaint data received from HUD, the Massachusetts Commission Against Discrimination, and the Fair Housing Center of Greater Boston indicate that there appears to be housing discrimination in the North Shore HOME Consortium service area. These discriminatory actions most frequently occur in the rental market and are most often associated with different terms and conditions and refusal to make reasonable accommodation. The protected classes most frequently cited in the complaint data are disability, familial status, and race.

Furthermore, there appears to be a lack of understanding of fair housing law, who is protected under the law, and what to do in the event of an alleged fair housing violation. The stakeholder community, as well as both providers and consumers of housing, do not understand where to turn for fair housing services nor where to go to lodge a fair housing complaint. As well, the fair housing dialogue is often confused with affordable housing and landlord/tenant issues. Many of the respondents to the 2007 Fair Housing Survey, conducted for the purposes of this research, acknowledged that additional outreach and education is necessary.

Lastly, the Fair Housing Forums illuminated additional fair housing concerns, one of which is the prospective legal risk associated with zoning policies that may be designed to restrict housing suitable for families.

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2007 Analysis of Impediments to Fair Housing Choice for the North Shore HOME Consortium uncovered several issues that can be considered to be barriers to affirmatively furthering fair housing and impediments to fair housing choice. These are as follows:

1. Lack of awareness of fair housing rights
 - a. Lack of understanding of state and federal fair housing law
 - i. Uncertain of who or what groups are protected under the law
 - ii. Lack of knowledge of actions that constitute violations of fair housing law
 - b. Insufficient outreach and education among stakeholders
2. Lack of awareness and understanding of available fair housing services
 - a. Don't know where to turn for pursuit of fair housing complaint
 - b. Lack uniformity in referrals for prospective victims of housing discrimination
 - c. Tendency to want to judge the situation prior to referral
3. Fair housing service delivery system is not as effective as desired

- a. Complex process may be burdensome
 - i. Selected institutional barriers exist, such as MCAD difficult to access
 - ii. HUD defers to MCAD
 - iii. High proportion of complaints ruled as no cause or determined to be without merit
 - b. Lack of stakeholder exposure to fair housing training
 - c. Consumers face lack of access to fair housing complaint system
 - d. Lack of awareness of testing by providers and stakeholders alike
4. High home mortgage loan denial rates for selected minorities
 - a. Especially high denial rates in sub-prime mortgage lending markets
 - b. Concern about subprime lenders targeting key minority groups
 5. Unlawful discrimination appears to be occurring in rental markets, particularly as it relates to disability, familial status, and race or national origin
 - a. Discriminatory terms and conditions in rental
 - b. Failure to make reasonable accommodation
 6. The dialogue needed for the educated discussion of affirmatively furthering fair housing is constrained because of the confusion about the differences between:
 - a. Affirmatively furthering fair housing (E&O, testing, enforcement)
 - b. Promotion and provision of available and affordable housing
 - c. Discriminating between landlord/tenant issues and fair housing concerns
 7. The high concentrations of minority and disabled populations tends to support the notion that housing location policies are not as inclusive as may be desired in affirmatively furthering fair housing
 8. Recent case history shows that local housing authorities within the Consortium award preference to individuals on subsidized housing waiting lists based upon local residency. This may be viewed as an impediment to fair housing choice for individuals not residing within each of these local communities who may wish to move to another community; furthermore, this practice may contribute to a lack of demographic diversity within the Consortium's thirty communities

SUGGESTED ACTIONS FOR THE HOME CONSORTIUM TO CONSIDER

In so finding these impediments, the North Shore HOME Consortium should consider taking the following actions:

1. Assist in improving awareness of fair housing law
 - a. Acquire and distribute fair housing flyers and pamphlets, including materials about landlord/tenant law, to social service agencies, residential rental property

- agencies, faith-based organizations, Hispanic advocacy and service agencies, and other entities
- i. Some materials should represent posters highlighting referral system, discriminatory actions, and protected class status
 - ii. Materials should address who is protected
 - iii. Materials should address what actions are not allowed
2. Assist in improving understanding of available fair housing services
 - a. Arrange for staff and related housing providers to get fair housing training
 - b. Use the Fair Housing Center of Greater Boston for some pilot testing and educational programs, particularly in the rental markets
 3. Assist in improving fair housing delivery system
 - a. Arrange for additional fair housing training from the Fair Housing Center of Greater Boston
 - b. Design simple set of instructions for uniform fair housing referral system
 - i. Include contact numbers, definitions of discriminatory actions and what represents protected class status
 - ii. Distribute these materials to individuals, advocates, interested parties, and government entities throughout the Consortium communities
 - c. Conduct outreach and education activities, especially to minority populations, particularly the black and Hispanic communities
 - i. Emphasize credit operation and responsible use of credit
 - ii. Work with local banking community to assist in educating housing consumers
 - iii. This includes first-time homebuyer training related to the establishment of good credit and the use of credit and wise credit choices
 4. To counteract high denial rates, consider implementing first-time homebuyer training program targeted at particular types of consumers
 - a. Conduct outreach and education for prospective homebuyers
 - b. Address establishing good credit and the wise use of credit
 - i. Include discussion that helps to make prospective credit consumers aware of what constitutes predatory lending practices
 - c. Solicit support and actions of responsible lenders in the community
 - d. Solicit support and actions of responsible Realtors in the community
 5. Incorporate more formalized elements of fair housing planning in Consolidated Plan
 - a. Within the Consolidated Planning Process, establish an opportunity to provide descriptions that distinguish the differences between fair housing, the provision of affordable housing and landlord/tenant law
 - b. Describe the outreach and education process in clear, easy to understand terms
 - c. Open public dialogue on methods to enhance inclusive housing location in the public policy formation

6. To aid in expanding awareness of inclusive land use policies, the Consortium might wish to consider extending fair housing training to the area's boards and commissions, as well as public and elected officials
7. Assist in alerting involved agencies to the prospects of their involvement in institutional barriers that detract from affirmatively furthering fair housing or acting in the public interest of furthering education of fair housing and the fair housing system
 - a. An initial activity would be to provide the MCAD with the results of the NSHC Analysis of Impediments
 - b. A secondary follow-up to this would be to contact the MCAD and request a reaction to the findings of the Analysis of Impediments to Fair Housing Choice

SECTION I. INTRODUCTION

BACKGROUND

The Federal Fair Housing Act of 1968 made it illegal to discriminate in the area of housing because of a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Familial status includes parents or legal guardians of minors under the age of 18. Disability covers physical and mental disabilities as well as people with AIDS or alcoholism. Federal fair housing statutes are largely covered by the following three pieces of legislation:

- The United States Fair Housing Act
- The United States Housing Amendments Act
- The United States Americans with Disabilities Act

In addition to prohibiting discrimination based upon the federal laws above, Massachusetts Fair Housing Law prohibits discrimination based on marital status, sexual orientation, veteran status, blindness, age, ancestry, hearing impairment, or possession of an assistance dog, such as a guide dog or hearing dog.² Additionally, the law prohibits discrimination against individuals or families receiving public assistance or rental subsidies, or because of any of the requirements of these programs. There is no exemption to this section of the Massachusetts Fair Housing Law.

Furthermore, Massachusetts law requires that whenever a property containing dangerous levels of lead undergoes a change in ownership and as a result, a child under the age of six will become or continue to be a resident, the new owner has 90 days to delead the premises.³

Provisions to affirmatively further fair housing are long-standing components of the United States Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from Section 808(e)(5) of the Federal Fair Housing Act, which requires the Secretary of HUD to administer HUD's housing and urban development programs in a manner which affirmatively furthers fair housing.

WHY ASSESS FAIR HOUSING?

In 1994, HUD published a rule consolidating its housing and community development programs into a single plan called the Consolidated Plan for Housing and Community

² Massachusetts Fair Housing Act, G.L. Chapter 151B, 1;
http://www.massfairhousing.org/joomla/index.php?option=com_wrapper&Itemid=36

³ Massachusetts Lead Paint Law, Chapter 111, 189ff;
http://www.massfairhousing.org/joomla/index.php?option=com_wrapper&Itemid=36;
<http://www.sec.state.ma.us/cis/cissfsn/sfsnidx.htm#lead>

Development. The consolidated programs are the Community Development Block Grant program (CDBG), HOME Investment Partnerships Program (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).

The North Shore HOME Consortium holds periodic required meetings with all emergency shelter providers and is the recipient of approximately two million dollars annually from the federal Home Investment Partnerships Program (HOME). The Consortium is comprised of 27 non-entitled communities and the three entitlement cities of Haverhill, Salem, and Gloucester. These geographic areas are presented in Table I.1, at right. The Consolidated Plan is the Consortium’s planning tool for operating the HOME Program and American Dream Downpayment Initiative (ADDI),⁴ and sets forth the housing agenda with respect to the entitlement cities and encompasses those communities’ plans for the use of HOME funds.

In addition, the Consortium is the convener of the North Shore Continuum of Care Alliance – a regional organization which is comprised of local and regional providers of emergency shelter and supportive services to the homeless. The Alliance is working toward the goal of minimizing the need for emergency shelters by providing permanent housing resources – and services as needed – to those who would otherwise be homeless. Through this work, the Alliance has been successful in bringing additional resources to this region in the form of HUD McKinney-Vento Homeless Assistance Grants to fund multiple local programs annually.

As a part of the Consolidated Planning process, entitlement jurisdictions are required to submit to HUD certification that they are **affirmatively furthering fair housing**. As such an entitlement jurisdiction, the North Shore HOME Consortium is required to submit to HUD certification that it is affirmatively furthering fair housing. This certification has three elements, which require the Consortium to:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

**TABLE I.1
NORTH SHORE HOME
CONSORTIUM
2000 CENSUS POPULATION**

Community	Population
Amesbury	16,450
Andover	31,247
Beverly	39,862
Boxford	7,921
Danvers	25,212
Essex	3,267
Georgetown	7,377
Gloucester	30,273
Hamilton	8,315
Haverhill	58,969
Ipswich	12,987
Lynnfield	11,542
Manchester-by-the-Sea	5,228
Marblehead	20,377
Merrimac	6,138
Methuen	43,789
Middleton	7,744
Newburyport	17,189
North Andover	27,202
Peabody	48,129
Rockport	7,767
Rowley	5,500
Salem	40,407
Salisbury	7,827
Swampscott	14,412
Topsfield	6,141
Wenham	4,440
West Newbury	4,149
North Reading	13,837
Wilmington	21,363
Total	555,061

⁴ <http://www.peabody-ma.gov/commdev/pdf/5YearConsolidatedPlan.pdf>

HUD defines impediments to fair housing choice in terms of their applicability to state and federal law, such as:

- Any actions, omissions, or decisions taken which restrict housing choices or the availability of housing choice because of race, color, religion, sex, disability, familial status, national origin, ancestry, marital status, sexual orientation, source of income, medical condition, age, or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choice for these classes.

HUD interprets these broad objectives to mean:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.⁵

Consequently, the purpose of this report is to document findings of the Analysis of Impediments to Fair Housing Choice and suggest actions that the Consortium can consider in working toward overcoming the identified impediments.

LEAD AGENCY

The North Shore HOME Consortium is an umbrella organization for thirty cities and towns in northeastern Massachusetts, encompassing portions of the Merrimack Valley and the North Shore. As the lead community in the Consortium, the City of Peabody has responsibility for administering the HOME Program and preparing the Consolidated Plan in consultation with public officials from member communities, residents, state agencies and various stakeholders, including local housing authorities, social service providers and community-based and other non-profit organizations. The AI research and final report was prepared by Western Economic Services, LLC, a Portland, Ore. consulting firm specializing in analysis and research in support of housing and community development planning.

COMMITMENT TO FAIR HOUSING

In accordance with the applicable statutes and the regulations governing the Consolidated Plan regulations, the North Shore HOME Consortium certifies that it will ***affirmatively further fair housing***. This means that the jurisdictions have conducted an analysis of

⁵ *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

impediments to fair housing choice within the region, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

RESEARCH METHODOLOGY

The Analysis of Impediments is a thorough examination of a variety of sources related to housing and the protected classes. It involves primary research, which is the collection and analysis of raw data, and secondary research, which entails the review of existing data and studies. This approach, combining both qualitative and quantitative research components, provides a rich data set for analyzing impediments to fair housing choice. The following narrative provides a brief description of the research methodologies and data sources employed for the 2007 AI.

Much of the baseline secondary data and quantitative information providing a picture of the Consortium's housing marketplace were drawn from the 2000 Census and intercensal estimates. These data included Census population information, personal income, poverty estimates, housing units by tenure, cost burdens, housing conditions, and a variety of other data depicting the socio-economic context in which housing choices are made by consumers. In addition, other very interesting data was evaluated for the North Shore HOME Consortium Analysis of Impediments.

HOME MORTGAGE DISCLOSURE ACT DATA

The Home Mortgage Disclosure Act was enacted by Congress in 1975 and amended from 1988 to 1991. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. Financial institutions are required to report data regarding loan applications, along with information concerning their loan originations and purchases. HMDA requires many lenders to report the race and sex of mortgage applicants. For this analysis, HMDA data covering the period from 2001 through 2005 was analyzed, with denial rates by race and ethnicity of applicants the key research objective. Furthermore, the types of lending institutions were separated by the primary type of lending activities in which they engaged, such as subprime mortgages.

FAIR HOUSING COMPLAINT DATA

Fair housing complaint data for the thirty member communities covering the period from 2001 through 2006 was received from HUD. The information included basis of complaint, issue pursuant to the complaint, and closure status of the alleged fair housing infraction. This allowed inspection of the tone and relative degree and frequency of certain types of unfair housing practices seen in the Consortium. Similar data were received from the Massachusetts Commission Against Discrimination.

2007 FAIR HOUSING SURVEY

One of the methods HUD recommends to gather public input about perceived impediments to fair housing is to conduct telephone interviews. The Consortium selected a list of more than 200 key stakeholders to participate in the 2007 Fair Housing Interviews. The list included elected officials, representatives of state and local government, as well as community based organizations and activists. Prospective participants were also drawn from experts in areas such as residential and commercial building codes and regulations; state, local, and federal occupancy standards; residential health and safety codes and regulations (structural, water & sewer); state tax law and low income tax waivers; state and local land use planning; banking and insurance laws and regulations; real estate development; real estate sales and management; renter rights and obligations; civil rights, fair housing, disability, social service, and other advocacy organizations; and similar housing providers. A sample list of prospective respondents is included herein as Exhibit I.1, on the following page. Reaching such an experienced group allows for qualitative analysis of general views and trends experienced throughout the area, as well as gaining expert knowledge of fair housing issues in the region.

In July of 2007, Mr. Kevin J. Hurley, Director of the North Shore HOME Consortium, sent each prospective respondent on the stakeholder list a letter introducing the 2007 Analysis of Impediments to Fair Housing Choice Study. The letter described the types of information being sought and guaranteed anonymity for each respondent. The letter also discussed the purpose of the study, what would be examined, and why the respondent's participation was important.

Within one week of the respondents' receipt of the letter from Mr. Hurley, the interviews were initiated. The interview was a blend of both closed and open-ended questions, inquiring about knowledge of fair housing law, protected classes, and concerns about fair housing in the North Shore.

The interview process also requested knowledge of violations of fair housing law, situations in which discrimination was exhibited, and the respondent's sense of barriers or constraints to affirmatively furthering fair housing, including their knowledge and understanding of state and local policies that may inhibit affirmatively furthering fair housing. Each respondent was asked about the level and quality of fair housing services needed in the North Shore, specifically targeting the needs for education, outreach, testing, and enforcement. The findings of these surveys proved to be both useful and insightful.

EXHIBIT I.1
2007 NORTH SHORE HOME CONSORTIUM FAIR HOUSING SURVEYS
SELECTED LIST OF PROSPECTIVE PARTICIPANTS

A.M. Scotti Associates	EA Realty	Millfalls Apartments
Action Inc.	East Boston Savings Bank	Mission Towers
American Red Cross	East Coast Properties	NAACP Merrimack Valley Branch
American Red Cross Merrimack.	Eastern Bank	Nelson, Bromby & Associates
Anchor to Windward Inc	Economy Co-Operative Bank	New Age Real Estate
Andover Commons	Emmaus Inc.	Normandy Real Estate
Annisquam Village Realty	ERA HomeQuest	North Shore ARC
Apple Village	ESherman Associates	North Shore Housing Trust
Asher Development & Homes	Exit Professional Realty	Northmark Bank
Avalon at Crane Brook	Fairweather Apartments	Northridge Homes
Avalon Oaks	First National Bank	Olson Real Estate
AVH Realty	First National Bank of Ipswich	Opportunity Works
Ballardvale Co.	Fitz Lufkin, Real Estate	Park Gardens (Methuen)
Bank of America	Garrison Partners	Park Place Real Estate
Beaton Real Estate	Gasperoni & Company	Peabody House
Ben Mosho Real Estate	Georgetown Savings Bank	Pequot Highlands
Bertram House of Swampscott	Glenway Avenue Residence	Phoenix Row Apts
Beverly National Bank	Glover Realty	Phyllis Leonard Real Estate
Bletzer Realty Corp.	Gordon Realty	Points North Realty
Bovardi Real Estate	Granite Savings Bank	Presidential Gardens
Bridgewell	Greater Lynn Mental Health	Princeton Crossing Apts
Brookside Estates	Greater Lynn Senior Services	Prudential North Shore Realty
Brown School Residences	Habitat for Humanity - North Shore	RE/MAX Country Crossroads Rlty
Buyer's Choice Realty	Habitech Inc.	RE/MAX Main St. Associates
Byrne Attorney at Law	Hadley West	RE/MAX Village Properties
Cable Gardens	Haverhill Bank	Realty Marketplace
Cain Polley & Dexter Exc. Buyer	Haverhill Citizen's Center	Rowley Realty
Cape Ann Savings Bank	Heritage at Danvers	Sagan Agency, REALTORS
Capstone House Ministries	Heritage House	Savings Bank
Carlson GMAC Real Estate	Indeck Real Estate	Sluice Associates Inc.
Catholic Charities North	Inn-Transition	Sovereign Bank
CB Associates	J. Barrett & Co., LLC	Strongest Link AIDS Services
Centerville Woods	Jaclen Tower	Tache Real Estate, Inc.
Central Grammar	James Steam Mill	TD Banknorth
Century 21 Dean Luxury Homes	Janet L. Johnson R.E.	Team Coordinating Agency Inc.
Century 21 deAN Tri Town	Judson House	Thatcher Management & Resource
Century 21 Heritage Realty	Keller Williams Realty	The Drumlin Group, Inc.
Century 21 North Shore R.E.	Kelly Realty Associates	The Inn-Between - Office
Century Bank & Trust Co.	Kip Penney, Realtors	The Millery
Citizens Bank	Lebanese Community Housing	The Real Estate Connection
Clients 1st Real Estate Svcs	Little & Co., Realtors, LLC	The Tannery
Cobblestones Real Estate	Longarini and Associates	Town & Country Homes, Inc.
Colby Properties, Inc	Loring Towers	Trinity Financial
Coldwell Banker Res. Brokerage	Mack Realty Group, Inc.	Vadala Real Estate
Conant Village	Manchester Buyer Brokers	Vernon A. Martin Inc.
Confalone Construction	Marblehead Town - Veterans Srvc	Voces
Council on Aging	Marland Place	Waterhouse Realty Assoc.
Daley's Real Estate	Martin Joseph Realtors	William Raveis RE & Home Serv.
Dan Bennett Real Estate	McKeon/Corcoran Real Estate	Windhill Realty, LLC
Danforth Properties LLC	Merrimack Valley Apts	Wood Ridge Homes
Danvers Bank	Michel Real Estate	YMCA of the North Shore
Desvaux House	Middleton House	ZHA Inc.

THE 2007 FAIR HOUSING FORUMS

An additional component to the community outreach efforts included a set of public input meetings. Entitled the 2007 Fair Housing Forums, these meetings were designed to present preliminary findings of quantitative and qualitative research to the public. This presentation was approximately 60 minutes in length. These meetings gave interested parties an opportunity to offer perspective and commentary about their own personal views of fair housing and what the Consortium's member communities should be doing to better affirmatively further fair housing.

These forums were not advertised in mass media publications, but many people were invited to attend by direct solicitation via e-mail or telephone call. Additional invitations involved verbal contact during each of the completed 2007 Fair Housing Interviews. Respondents were alerted to the scheduled forums and sent a flyer announcing the meeting locations and times.

PUBLIC NOTIFICATION OF AVAILABILITY OF DRAFT 2007 AI

The City of Peabody, as lead agency for the North Shore HOME Consortium, provided notice of the availability of the Draft 2007 Analysis of Impediments to Fair Housing Choice.

SECTION II. NORTH SHORE HOME CONSORTIUM

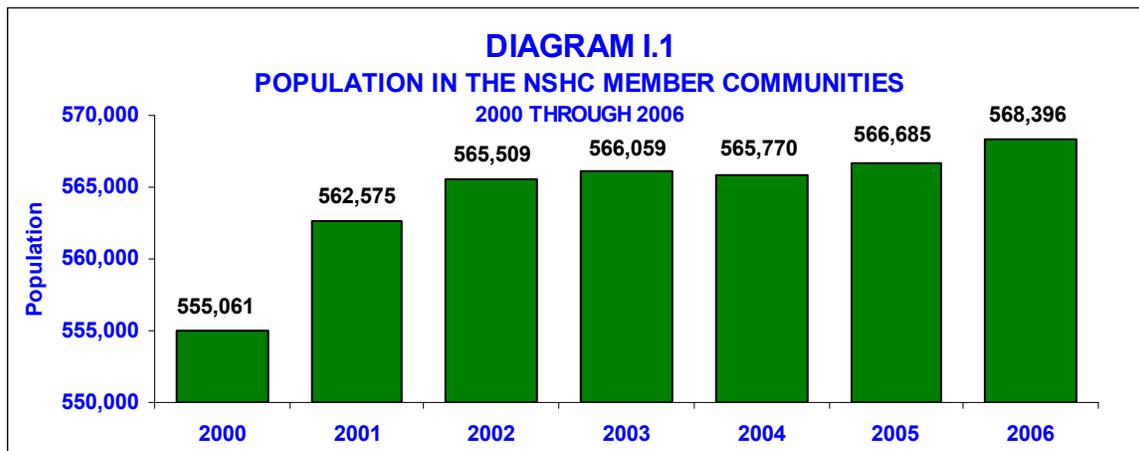
INTRODUCTION

The following narrative provides general background information from the 2000 Decennial Census. A broad range of socioeconomic characteristics was evaluated, including population, race and ethnicity, disability, poverty, low-income concentrations and housing conditions. These data provide context to the North Shore HOME Consortium's housing market and market trends and the factors that influence housing choice and respective impediments to fair housing choice.

DEMOGRAPHICS IN THE NORTH SHORE HOME CONSORTIUM AREA

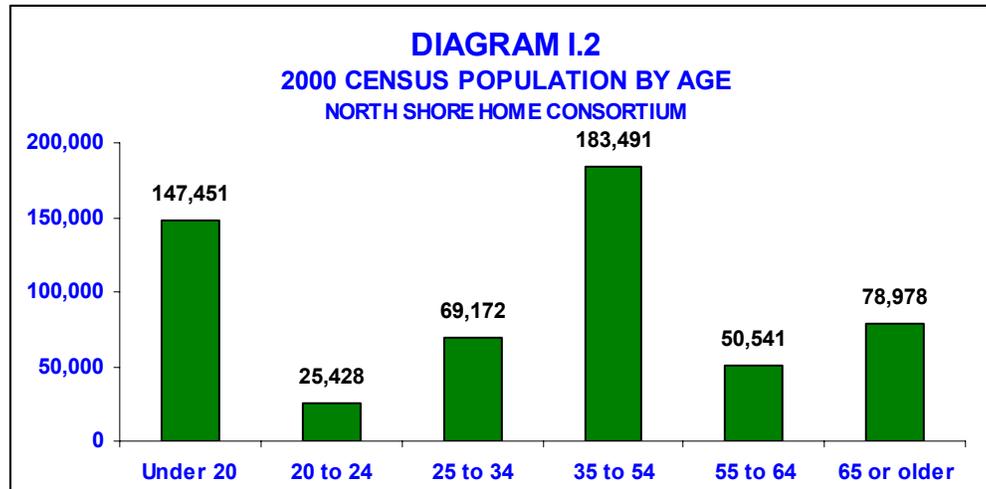
POPULATION

On June 28, 2007, the U.S. Census Bureau released new estimates of the nation's population, by county and city, for the period ending July 1, 2006. The rate of change in the region's population is fairly low, with the population growing 2.4 percent in the 2000 through 2006 time period. However, a large portion of the total population change was estimated by the Census Bureau to have occurred between 2000 and 2001, as seen in Diagram I.1, below. During the same time period, the United States grew about 6.4 percent, evidence that the North Shore is growing more slowly than the U.S. as a whole.



However, the distribution and rate of growth of the North Shore's population is not evenly distributed. Middleton expanded the most, some 20.3 percent, far outpacing the next most rapidly growing communities: Georgetown, at just under 10 percent, followed by Salisbury, at 7.8 percent. Several communities actually lost population, with Swampscott losing nearly 2 percent and Rockport losing about 1 percent. Detailed data for each of the member communities is presented in Table A.1 of Appendix A.

Diagram I.2 shows the population distribution by age for the North Shore as drawn from the 2000 Census. The largest age cohort for the North Shore HOME Consortium Region represents those persons from age 35 to 54, having some 183,491 persons, with those under twenty the next largest, having 147,451 persons in the cohort.



RACE AND ETHNICITY

Population by race and ethnicity from the 2000 Census is presented in Table II.1, at right. While at the time of the 2000 Census the North Shore HOME Consortium area had 555,000 people; more than 94 percent of the entire population was white, only 1.7 percent was Asian, and just 1.1 percent of the population was black.

**TABLE II.1
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, 2000 CENSUS**

Race	2000 Census	% of Total
White	522,443	94.12
Black or African American	5,836	1.05
American Indian and Alaskan Native	768	0.14
Asian	9,471	1.71
Native Hawaiian and Other Pacific Islander	127	0.02
Some other race	9,727	1.75
Two or more races	6,689	1.21
Total North Shore	555,061	100.00
Hispanic	20,392	3.67

Furthermore, the largest minority population was of Hispanic ethnicity, comprising a still-small 3.7 percent, or just fewer than 20,400 persons.

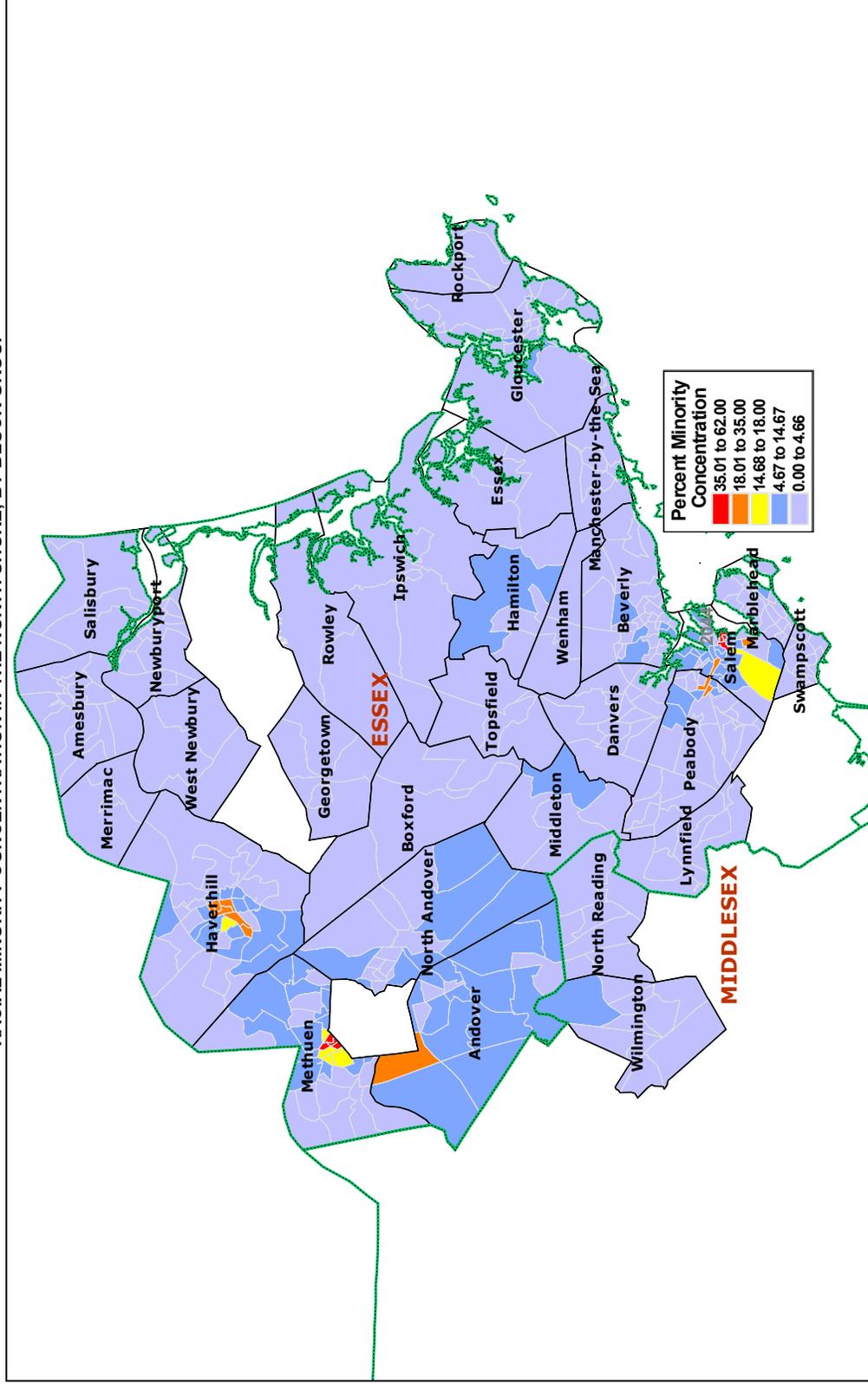
However, the spatial distribution of these populations is not uniform throughout the North Shore HOME Consortium. Some areas have relatively high concentrations of such minority populations and others have almost no minority representation. For the purposes of planning, HUD defines an area having a disproportionate share of a minority population as an area having a portion that is more than 10 percentage points higher than the jurisdiction average. To inspect the actual distribution of the minority races in the area, a tabulation of this data by member community was prepared and is presented on the following page in Table II.2. As seen therein, no community has a disproportionate share, although Salem has the highest concentration of minorities, with in excess of 12 percent of its population of a one-race minority; Methuen and Haverhill have the next largest minority populations, with 8.8 and 8.3 percent respectively.

TABLE II.2
NORTH SHORE HOME CONSORTIUM POPULATION BY RACE
2000 CENSUS: SF1

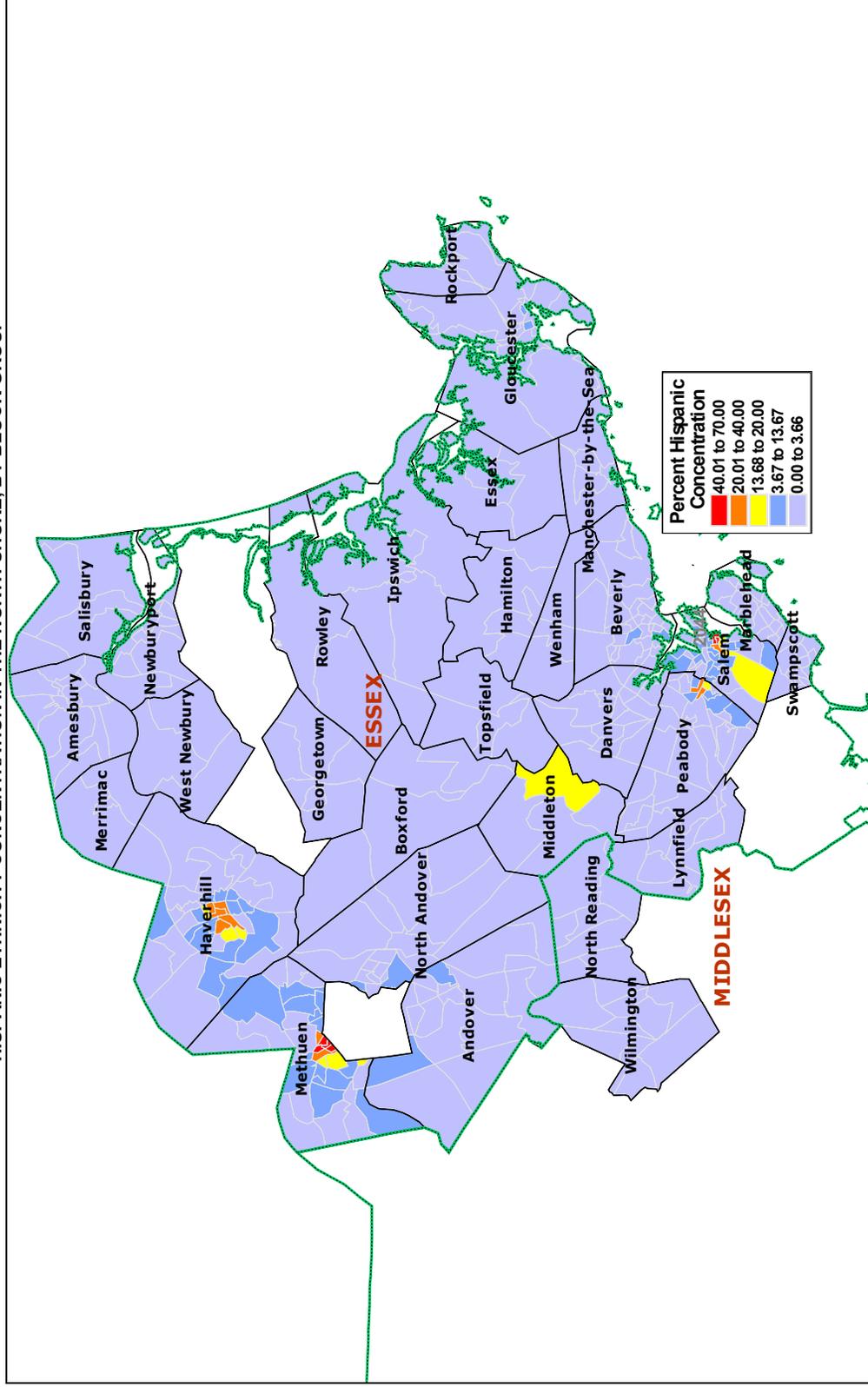
City or Town	White	Black	American Indian or Alaskan	Asian	Native Hawaiian/ Pacific Is.	Some Other Race	Two or More Races	Total	One-Race Concentration %
Amesbury	15,988	105	37	95	4	40	181	16,450	1.7
Andover	28,621	234	19	1,791	11	262	309	31,247	7.4
Beverly	38,257	413	70	511	12	207	392	39,862	3.0
Boxford	7,713	27	9	96	2	23	51	7,921	2.0
Danvers	24,638	87	25	281	4	55	122	25,212	1.8
Essex	3,218	5	4	14	1	7	18	3,267	0.9
Georgetown	7,268	11	10	31	.	23	34	7,377	1.0
Gloucester	29,361	186	37	218	7	152	312	30,273	2.0
Hamilton	7,832	39	14	354	4	28	44	8,315	5.3
Haverhill	52,878	1,419	129	801	18	2,536	1,188	58,969	8.3
Ipswich	12,675	51	11	104	1	43	102	12,987	1.6
Lynnfield	11,165	50	.	222	4	24	77	11,542	2.6
Manchester-by-the-Sea	5,169	3	9	20	.	6	21	5,228	0.7
Marblehead	19,879	89	16	200	6	38	149	20,377	1.7
Merrimac	6,032	24	7	17	.	18	40	6,138	1.1
Methuen	39,126	591	97	1,040	5	2,131	799	43,789	8.8
Middleton	7,390	128	4	86	4	21	111	7,744	3.1
Newburyport	16,864	73	21	105	2	27	97	17,189	1.3
North Andover	25,481	196	14	1,078	2	201	230	27,202	5.5
Peabody	45,204	466	57	667	7	883	845	48,129	2.0
Rockport	7,591	21	17	35	2	40	61	7,767	4.3
Rowley	5,411	13	14	25	.	15	22	5,500	1.5
Salem	34,497	1,274	87	807	19	2,724	999	40,407	1.2
Salisbury	7,635	32	24	27	7	20	82	7,827	12.2
Swampscott	14,047	106	9	98	3	41	108	14,412	1.4
Topsfield	6,003	23	2	52	.	21	40	6,141	1.8
Wenham	4,344	19	1	60	.	3	13	4,440	1.6
West Newbury	4,086	8	1	22	.	15	17	4,149	1.9
North Reading	13,495	55	6	180	1	33	67	13,837	1.1
Wilmington	20,575	88	17	434	1	90	158	21,363	2.9
Total	522,443	5,836	768	9,471	127	9,727	6,689	555,061	4.7

Census Tract Block Groups were then evaluated by computing their percentage share of total population and presenting these data in geographic maps. In Map II.1, on the following page, the concentrations of minority racial populations are presented. This represents the percentage portion of one-race non-white persons in each Census Block Group. The jurisdiction average is about 4.7 percent of the North Shore HOME Consortium's total population. Hence, all those Block Groups having more than 14.7 percent minority concentration can be said to have a disproportionate share. Some 5.8 percent of the Block Groups, or 23 Block Groups, have a disproportionate share of this one-race racial minority group. The communities having these disproportionate Block Groups are Salem, Methuen, Peabody, Haverhill, and Andover. Both Haverhill and Methuen have the most, seven each, with Salem having six, Peabody two, and Andover one. However, Salem has the two most highly concentrated minority race Block Groups, with minorities comprising some 62 and 48 percent of the total population in those Block Groups. A tabulation of all block groups and race data are presented in Table A.4 of Appendix A.

MAP II.1
NORTH SHORE REGION
RACIAL MINORITY CONCENTRATION IN THE NORTH SHORE, BY BLOCK GROUP



MAP II.2
NORTH SHORE REGION
HISPANIC ETHNICITY CONCENTRATION IN THE NORTH SHORE, BY BLOCK GROUP



A similar calculation of minority data was prepared for those persons of Hispanic ethnicity. The North Shore average Hispanic population concentration in the 2000 Census was 3.7 percent. None of the member communities have Hispanic populations of over 13.7 percent; Salem comes close with 11.2 percent, Methuen has 9.6 percent, and Haverhill has 8.8 percent of its citizens of Hispanic descent, as seen in Table II.3.

Still, this population is not uniformly distributed throughout the area. Some Block Groups are substantially higher in their share of Hispanic population, while some have far lower percentages of Hispanics as a part of their population.

In fact, 25 Block Groups throughout the member communities indicate a disproportionate share of Hispanics. The communities having the most disproportionate Block Groups are Methuen and Haverhill, each with eight Block Groups, and Salem, Peabody, and Middleton, with 5, 3, and 1, respectively. It is again Salem that has two Block Groups with the most highly concentrated populations, 70 percent and 67 percent. These data are presented in Map II.2.

DISABILITY STATUS

Disproportionate share was also computed for disability. Disability is defined by the Census Bureau as a lasting physical, mental, or emotional condition that makes it difficult for a person to do activities or impedes them from being able to go outside the home alone or to work.⁶

**TABLE II.3
HISPANIC AND TOTAL POPULATION IN CONSORTIUM
2000 CENSUS**

City or Town	Hispanic Population	Total Population	Hispanic Concentration %
Amesbury	156	16,450	0.9
Andover	567	31,247	1.8
Beverly	720	39,862	1.8
Boxford	67	7,921	0.8
Danvers	210	25,212	0.8
Essex	30	3,267	0.9
Georgetown	47	7,377	0.6
Gloucester	449	30,273	1.5
Hamilton	82	8,315	1.0
Haverhill	5,174	58,969	8.8
Ipswich	135	12,987	1.0
Lynnfield	77	11,542	0.7
Manchester-by-the-Sea	40	5,228	0.8
Marblehead	179	20,377	0.9
Merrimac	55	6,138	0.9
Methuen	4,221	43,789	9.6
Middleton	485	7,744	6.3
Newburyport	151	17,189	0.9
North Andover	541	27,202	2.0
Peabody	1,651	48,129	3.4
Rockport	83	7,767	1.1
Rowley	47	5,500	0.9
Salem	4,541	40,407	11.2
Salisbury	92	7,827	1.2
Swampscott	183	14,412	1.3
Topsfield	51	6,141	0.8
Wenham	26	4,440	0.6
West Newbury	27	4,149	0.7
North Reading	102	13,837	0.7
Wilmington	203	21,363	1.0
Total	20,392	555,061	3.7

⁶ The data on disability status were derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental, or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor's office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

Defined in this fashion, the North Shore HOME Consortium area's disabled population comprised some 16.06 percent of the region's population aged 5 or older during the 2000 Decennial Census. While this is lower than the national norm of 19.3 percent, there are indeed places in the member communities that tend to have a higher concentration of the disabled.

Sometimes this can be due to relative location to available services, a positive outcome of the location choice; but at other times it may be related to a lack of adequate housing supply for disabled citizens. For example, Haverhill and Salisbury have disability rates above 20 percent. On the other hand, Topsfield's disability rate is below 7 percent, as seen in Table II.4, at right. As noted therein, none of the member communities have a disability rate that is in excess of 26 percent, or having a disproportionate share of disabled, representing 10 percentage points higher than the regional average of 16 percent.

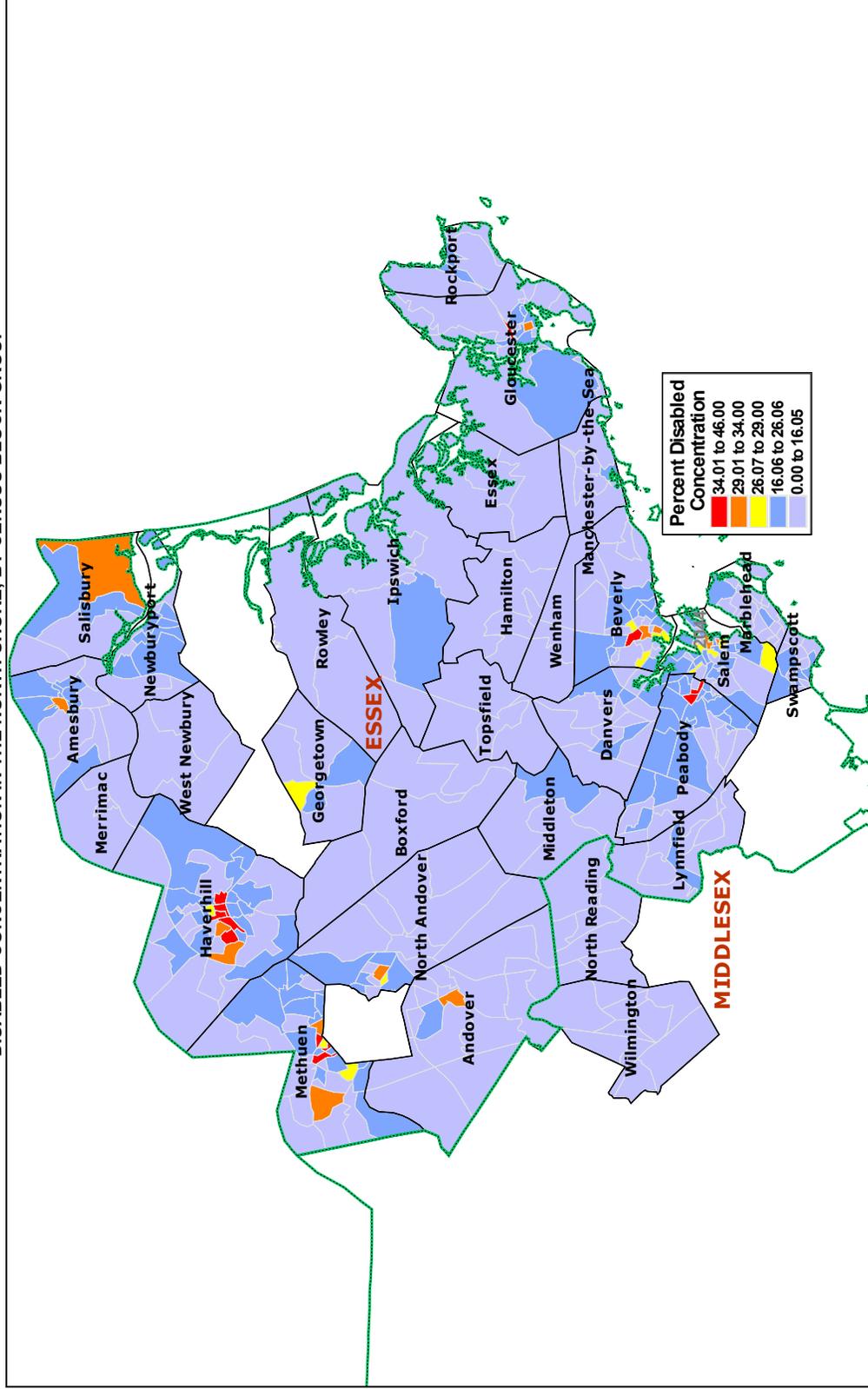
The 2000 Decennial Census data was also analyzed by Block Group to determine the degree to which the disabled

population was found to be highly concentrated in specific areas in the member communities. In this particular case, thirty-eight Block Groups were found to have a disproportionate share of the disabled. High concentration Block Groups are concentrated in Peabody, Beverly, Haverhill and Methuen. The geographic locations of these areas are presented in Map II.3, on the following page, and are further enumerated in Table A.5 of Appendix A.

TABLE II.4
NORTH SHORE HOME CONSORTIUM
DISABLED POPULATION: AGES 5 YEARS AND OLDER
2000 CENSUS: SF3

City or Town	5 to 15	16 to 20	21 to 64	65 or older	Total	Disability Rate
Amesbury	221	143	1,627	771	2,762	18.39
Andover	288	135	1,481	1,178	3,082	10.67
Beverly	316	341	3,655	1,926	6,238	17.09
Boxford	75	13	330	178	596	8.13
Danvers	192	130	1,768	1,183	3,273	14.18
Essex	30	16	150	149	345	11.19
Georgetown	68	30	718	205	1,021	15.12
Gloucester	213	176	2,725	1,652	4,766	16.88
Hamilton	85	9	466	270	830	10.67
Haverhill	698	539	7,225	2,816	11,278	20.95
Ipswich	121	84	892	616	1,713	14.09
Lynnfield	68	38	557	530	1,193	11.08
Manchester-by-the-Sea	74	31	290	181	576	11.62
Marblehead	243	71	1,262	815	2,391	12.66
Merrimac	28	18	328	259	633	11.17
Methuen	377	474	4,724	2,318	7,893	19.36
Middleton	31	5	563	303	902	15.35
Newburyport	53	102	1,787	902	2,844	17.79
North Andover	320	214	1,843	1,037	3,414	13.76
Peabody	311	298	4,901	2,913	8,423	18.81
Rockport	43	70	678	457	1,248	17.02
Rowley	38	26	362	186	612	12.15
Salem	323	455	4,611	2,118	7,507	19.75
Salisbury	69	78	956	421	1,524	20.92
Swampscott	119	107	1,048	743	2,017	15.18
Topsfield	8	20	160	203	391	6.91
Wenham	21	30	283	207	541	12.85
West Newbury	22	0	246	165	433	11.24
North Reading	135	44	762	458	1,399	11.03
Wilmington	103	136	1,490	629	2,358	12.14
Total	4,693	3,833	47,888	25,789	82,203	16.06

MAP II.3
NORTH SHORE REGION
 DISABLED CONCENTRATION IN THE NORTH SHORE, BY CENSUS BLOCK GROUP



LOW-INCOME CONCENTRATIONS

Similar to the discussions of racial, ethnic, and disabled concentrations, the distribution of low income households may provide some information on household location and housing choice. Across the North Shore, 19.7 percent of all households had incomes less than \$25,000, with about 23 percent of all households having incomes above \$100,000. As seen in Table II.5, below, both Rockport and Salem tend to have a higher level of households with incomes less than \$25,000, with nearly 27.9 percent of households in this income range for Rockport, and 26.6 percent for Salem. Boxford has by far the smallest concentration of low income households, with just 5.5 percent.

TABLE II.5
NORTH SHORE HOME CONSORTIUM HOUSEHOLDS BY INCOME RANGE
2000 CENSUS: SF3

City or Town	Less than \$10,000	\$10,000	\$15,000	\$20,000	\$25,000	\$35,000	\$50,000	\$75,000	\$100,000	\$150,000	Total Households
		to \$14,999	to \$19,999	to \$24,999	to \$34,999	to \$49,999	to \$74,999	to \$99,999	to \$150,000	or more	
Amesbury	431	311	367	378	681	815	1,466	988	758	230	6,425
Andover	640	412	227	358	475	1,209	1,553	1,613	2,166	2,693	11,346
Beverly	1,104	752	687	696	1,418	2,517	3,403	2,261	1,887	1,011	15,736
Boxford	42	0	40	58	62	163	367	303	626	899	2,560
Danvers	413	380	381	548	963	1,364	2,160	1,395	1,346	594	9,544
Essex	93	66	89	38	67	181	318	182	157	123	1,314
Georgetown	94	179	79	57	113	261	443	581	487	278	2,572
Gloucester	1,286	645	515	608	1,404	2,134	2,824	1,553	1,040	579	12,588
Hamilton	102	64	101	23	200	352	547	421	391	467	2,668
Haverhill	1,939	1,390	1,127	1,284	2,235	3,558	5,211	3,174	2,327	754	22,999
Ipswich	444	215	253	179	492	750	1,014	634	778	529	5,288
Lynnfield	121	112	73	148	263	354	801	631	808	869	4,180
Manchester-by-the-Sea	136	80	86	94	130	206	388	263	349	443	2,175
Marblehead	403	290	303	306	628	899	1,490	1,005	1,486	1,738	8,548
Merrimac	119	56	81	123	170	437	425	354	326	139	2,230
Methuen	1,427	875	834	784	1,737	2,663	3,611	2,384	1,628	584	16,527
Middleton	112	102	70	46	144	245	367	422	504	313	2,325
Newburyport	404	299	281	367	648	1,256	1,333	1,172	1,036	686	7,482
North Andover	448	400	404	318	748	1,064	1,562	1,334	1,929	1,492	9,699
Peabody	1,280	922	805	881	2,061	2,409	4,023	2,939	2,391	867	18,578
Rockport	185	272	255	255	216	521	715	397	389	267	3,472
Rowley	79	69	69	91	123	270	443	331	308	177	1,960
Salem	1,694	1,086	876	992	2,340	2,793	3,580	2,010	1,481	625	17,477
Salisbury	213	187	141	163	347	516	742	446	253	78	3,086
Swampscott	294	165	180	157	462	744	1,022	997	919	777	5,717
Topsfield	66	50	66	38	143	120	347	252	573	446	2,101
Wenham	54	63	70	46	66	74	204	142	274	285	1,278
West Newbury	60	39	25	16	68	107	226	236	336	288	1,401
North Reading	105	89	121	193	306	576	917	954	893	630	4,784
Wilmington	180	304	109	163	409	936	1,650	1,586	1,280	409	7,026
Total	13,968	9,874	8,715	9,408	19,119	29,494	43,152	30,960	29,126	19,270	213,086

The percent concentration of low-income households was calculated from the 2000 Decennial Census, again by Census Block Group. This distribution of low-income households does not appear to be uniformly distributed around the North Shore, as seen in Map II.4, on the following page.

There are 61 Block Groups that have 30 percent or more of all households with incomes less than \$25,000, with 12 in Salem and 9 in Haverhill. A tabulation of these distributions and numbers of households by income are located in Table A.6 of Appendix A.

POVERTY IN THE NORTH SHORE

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine who is poor. If a family's total income is less than that family's threshold, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index (CPI-U). The official poverty definition counts money income before taxes and does not include capital gains and non-cash benefits (such as public housing, Medicaid, and food stamps). Poverty is not defined for people in military barracks, institutional group quarters, or for unrelated individuals under age 15 (such as foster children). These groups are excluded from the poverty universe; that is, they are considered neither as "poor" nor as "nonpoor."

In the North Shore HOME Consortium member communities, the poverty rate is about 5.6 percent. This is significantly lower than the national average of about 12.4 percent, and is a very good indicator of the overall economic health of the member communities. However, the poverty rate throughout the area is not uniform; some areas have higher poverty rates than others, and some have a greater concentration of elderly in the ranks of those in poverty, with that concentration exceeding some 10 percent of the total elderly population.

Boxford and North Reading have the lowest poverty rates in the Consortium, with rates of 1.36 and 1.49 percent, respectively. Conversely, Salem and Haverhill have the highest rates of poverty, some 9.65 and 9.10 percent, respectively, as seen in Table II.6, on the following page. However, in comparison to the overall size of the population, Boxford has a relatively higher incidence of poverty among children under 5 years of age, but no older children in poverty; Boxford, overall, has the lowest poverty rate.

Interestingly, Lynnfield has a relatively high incidence of elderly aged 75 years and older that reside in poverty, roughly 36 percent of the entire poverty population in that community, or 103 of its 289 persons residing in poverty. Merrimac also has somewhat high figures for elderly poverty, with more than one quarter of its poverty population aged 75 or older. Topsfield has exactly 25 percent of its poverty population comprised of those aged 75 or older.

**TABLE II.6
NORTH SHORE HOME CONSORTIUM INDIVIDUALS IN POVERTY BY AGE**

2000 CENSUS: SF3

City or Town	Under 5 years	5 years	6 to 11 years	12 to 17 years	18 to 64 years	65 to 74 years	75 years and over	Total	Poverty Rate
Amesbury	94	22	102	93	493	55	92	951	5.93
Andover	49	34	142	106	630	86	158	1,205	3.89
Beverly	125	35	209	275	1,237	108	174	2,163	5.74
Boxford	21	.	.	.	64	9	14	108	1.36
Danvers	48	.	47	78	369	75	94	711	2.94
Essex	9	.	12	27	119	26	22	215	6.58
Georgetown	17	.	10	58	186	15	23	309	4.20
Gloucester	224	62	274	231	1,339	217	283	2,630	8.80
Hamilton	45	9	40	30	257	20	8	409	5.34
Haverhill	519	88	743	550	2,658	302	383	5,243	9.10
Ipswich	38	10	104	81	431	93	164	921	7.13
Lynnfield	5	.	30	20	131	.	103	289	2.50
Manchester-by-the-Sea	10	.	7	6	163	23	40	249	4.79
Marblehead	67	7	108	109	433	59	80	863	4.27
Merrimac	.	6	7	.	100	7	45	165	2.71
Methuen	296	75	391	299	1,643	173	324	3,201	7.38
Middleton	11	.	15	14	112	64	19	235	3.70
Newburyport	35	19	100	77	500	72	74	877	5.18
North Andover	48	7	97	43	412	42	90	739	2.92
Peabody	192	59	213	138	1,343	228	358	2,531	5.33
Rockport	25	.	9	21	179	10	42	286	3.73
Rowley	30	19	23	16	81	27	28	224	4.13
Salem	268	53	365	308	2,357	151	285	3,787	9.65
Salisbury	19	.	89	63	304	18	33	526	6.79
Swampscott	44	.	40	56	252	37	88	517	3.66
Topsfield	.	.	.	6	63	9	26	104	1.72
Wenham	.	.	18	.	65	12	20	115	3.28
West Newbury	20	10	18	.	72	26	10	156	3.76
North Reading	6	.	9	18	134	16	21	204	1.49
Wilmington	14	.	45	52	242	22	35	410	1.94
Total	2,279	515	3,267	2,775	16,369	2,002	3,136	30,343	5.61

HOUSING IN THE NORTH SHORE HOME CONSORTIUM AREA

The 2000 Census reported that there were over 222,000 housing units in the North Shore, of which 213,000 were occupied. This represents some 149,600 owner occupied units and another 63,480 renter units. Together, this represents a homeownership rate⁷ of some 70 percent, as seen in Table II.7, on the following page. This homeownership rate is slightly higher than the average for the nation in its entirety. However, the member communities had some 9,105 vacant housing units, of which nearly 4,000 were for recreational or seasonal use. Only 2,111 were for rent and 735 were for sale at the time the Decennial Census was taken in 2000. A detailed tabulation of the vacant housing is presented in Table A.7 of Appendix A.

⁷ Homeownership is defined from occupied housing statistics, with vacant housing not counted.

TABLE II.7
NORTH SHORE HOME CONSORTIUM HOUSING UNITS BY TENURE
2000 CENSUS: SF1

City or Town	Owner-occupied	Renter-occupied	Total Occupied	Vacant Housing Units	Total Housing Units	Homeownership Rates
Amesbury	4,198	2,182	6,380	243	6,623	65.80
Andover	8,885	2,420	11,305	285	11,590	78.59
Beverly	9,457	6,293	15,750	525	16,275	60.04
Boxford	2,497	71	2,568	42	2,610	97.24
Danvers	7,371	2,184	9,555	207	9,762	77.14
Essex	916	397	1,313	133	1,446	69.76
Georgetown	2,215	351	2,566	50	2,616	86.32
Gloucester	7,523	5,069	12,592	1,366	13,958	59.74
Hamilton	2,187	481	2,668	157	2,825	81.97
Haverhill	13,823	9,153	22,976	761	23,737	60.16
Ipswich	3,854	1,436	5,290	311	5,601	72.85
Lynnfield	3,950	236	4,186	87	4,273	94.36
Manchester-by-the-Sea	1,535	633	2,168	159	2,327	70.80
Marblehead	6,434	2,107	8,541	365	8,906	75.33
Merrimac	1,850	383	2,233	62	2,295	82.85
Methuen	11,881	4,651	16,532	353	16,885	71.87
Middleton	1,976	329	2,305	42	2,347	85.73
Newburyport	5,010	2,509	7,519	378	7,897	66.63
North Andover	7,053	2,671	9,724	219	9,943	72.53
Peabody	13,227	5,354	18,581	317	18,898	71.19
Rockport	2,241	1,249	3,490	712	4,202	64.21
Rowley	1,507	451	1,958	46	2,004	76.97
Salem	8,586	8,906	17,492	683	18,175	49.09
Salisbury	2,113	969	3,082	1,074	4,156	68.56
Swampscott	4,377	1,342	5,719	211	5,930	76.53
Topsfield	1,865	234	2,099	45	2,144	88.85
Wenham	1,098	187	1,285	35	1,320	85.45
West Newbury	1,295	97	1,392	31	1,423	93.03
North Reading	4,339	456	4,795	75	4,870	90.49
Wilmington	6,348	679	7,027	131	7,158	90.34
Total	149,611	63,480	213,091	9,105	222,196	70.21

However, the homeownership rate throughout the Consortium is not uniformly distributed. While Boxford has the highest rate of homeownership, with some 97.2 percent, the City of Salem has the lowest, at just over 49 percent. The other member communities range from nearly 60 to over 94 percent homeownership, as noted above.

HOUSING CONDITIONS

While the 2000 Census does not report significant details regarding the physical condition of housing units, some information is reported, as derived from the 1 in 6 sample, or SF3 data.⁸ This information pertains to the presence of overcrowding and the lack of complete plumbing and kitchen facilities.⁹

⁸ Data from the SF 3 data files are sample data and are subject to sampling error. As such, totals presented in the SF3 data may not sum to be equal to the SF1 data, the 100 percent sample.

⁹ As per the Census Bureau, a housing unit is classified as lacking complete plumbing/kitchen facilities when any of the following plumbing facilities are not present in a housing unit: (1) hot and cold piped water, (2) a flush toilet, and (3) a bathtub or shower; and for kitchen facilities: (1) a sink with piped water, (2) a range, or cook top and oven; and (3) a refrigerator.

Overcrowding is defined as a residence having from one to 1.5 people per room, with severe overcrowding defined as having more than 1.5 people per room. As a percentage of occupied housing, the North Shore has 1.01 percent of its housing units overcrowded, with another 0.38 percent severely overcrowded. This represents some 2,147 and 808 housing units, respectively. These data are presented in Table II.8. However, compared to statewide average statistics, overcrowding does not appear to be a substantive problem in the North Shore; Massachusetts data indicate an average of some 1.8 percent of the Commonwealth's housing units overcrowded and just over 1 percent severely overcrowded.

TABLE II.8
NORTH SHORE HOME CONSORTIUM INCIDENCE OF
OVERCROWDING
2000 CENSUS: SF3

City or Town	Persons per Room			Occupied Housing Units
	1.00 or less	1.01 to 1.50	1.51 or more	
Amesbury	6,284	70	8	6,362
Andover	11,186	79	40	11,305
Beverly	15,512	168	70	15,750
Boxford	2,568	0	0	2,568
Danvers	9,513	42	0	9,555
Essex	1,308	0	5	1,313
Georgetown	2,546	14	6	2,566
Gloucester	12,416	123	53	12,592
Hamilton	2,595	25	48	2,668
Haverhill	22,450	383	143	22,976
Ipswich	5,284	6	0	5,290
Lynnfield	4,150	25	11	4,186
Manchester-by-the-Sea	2,158	10	0	2,168
Marblehead	8,489	45	7	8,541
Merrimac	2,233	0	0	2,233
Methuen	16,141	287	104	16,532
Middleton	2,297	8	0	2,305
Newburyport	7,471	44	22	7,537
North Andover	9,641	66	17	9,724
Peabody	18,287	233	61	18,581
Rockport	3,449	26	15	3,490
Rowley	1,958	0	0	1,958
Salem	17,060	262	170	17,492
Salisbury	2,965	97	20	3,082
Swampscott	5,684	27	8	5,719
Topsfield	2,086	13	0	2,099
Wenham	1,285	0	0	1,285
West Newbury	1,388	4	0	1,392
North Reading	4,768	27	0	4,795
Wilmington	6,964	63	0	7,027
Total	210,136	2,147	808	213,091

However, the distribution of overcrowded households is not uniform throughout the Consortium. Salisbury tends to have a higher incidence of overcrowding, with 3.15 percent of its occupied units overcrowded. Hamilton has the highest incidence of severe overcrowding, with 1.8 percent of its occupied units severely overcrowded. On the other hand, Boxford, Merrimac, Rowley and Wenham are at the other extreme, with no overcrowded or severely overcrowded housing.

Another consideration pertaining to housing problems relates to whether the housing unit has complete plumbing and kitchen facilities. Overall, at the time of the 2000 Decennial Census, the North Shore had some 1,074 housing units that lacked complete plumbing facilities, just 0.5 percent of the entire housing stock, and some 1,329 units that lacked complete kitchen facilities, some 0.6 percent of the housing stock. These data are noted in Table II.9, below. These are substantively lower than the share of such units statewide, some 1.2 percent with incomplete plumbing and 1.3 percent lacking complete kitchen facilities.

TABLE II.9
NORTH SHORE HOME CONSORTIUM
UNITS LACKING COMPLETE PLUMBING/KITCHEN FACILITIES

2000 CENSUS: SF3		
City or Town	Lacking Complete Plumbing Facilities	Lacking Complete Kitchen Facilities
Amesbury	13	14
Andover	48	86
Beverly	66	130
Boxford	.	.
Danvers	35	51
Essex	7	.
Georgetown	10	.
Gloucester	140	111
Hamilton	.	.
Haverhill	112	144
Ipswich	28	27
Lynnfield	18	18
Manchester-by-the-Sea	19	10
Marblehead	17	26
Merrimac	.	.
Methuen	99	87
Middleton	.	.
Newburyport	52	54
North Andover	6	53
Peabody	90	113
Rockport	8	17
Rowley	24	16
Salem	154	208
Salisbury	37	18
Swampscott	37	104
Topsfield	.	.
Wenham	.	.
West Newbury	13	5
North Reading	23	13
Wilmington	18	24
Total	1,074	1,329

Again, the distribution of incomplete facilities is not uniform throughout the Consortium. Rowley tends to have a higher incidence of incomplete plumbing facilities, at 1.2 percent, while, Swampscott has the highest incidence of incomplete kitchen facilities at 1.8 percent. On the other hand, Boxford, Hamilton, Merrimac, Middleton, Topsfield and Wenham are at the other extreme, where all housing units have complete plumbing and kitchen facilities.

The third type of consideration pertaining to housing problems reported in the Decennial Census is cost burden. Cost burden is defined as households that spend from 30 to 50 percent of their household income on housing; severe cost burden is defined as households that spend more than 50 percent of their household income on housing. For renters, this represents the monthly rent, plus any energy expenses they may incur. For homeowners, this represents all property taxes, insurance, energy payments, as well as water and sewer service and refuse collection. If the homeowner has a mortgage the determination also includes principal and interest payments on the mortgage loan.

Overall, some 11,826 renter households in the North Shore experienced a cost burden at the time the 2000 Decennial Census was taken. This is 18.7 percent of all renter occupied housing units in the North Shore. Another 9,503 renters, or 15 percent, experienced a severe cost burden. Because of the size of the renter population in Salem the incidence of cost burdened renters is highest in that particular city. For a tabulation of cost burdens and severe cost burdens in all 30 communities, refer to Table A.8 in Appendix A.

On the other hand, some 18 percent of homeowners with a mortgage experienced a cost burden. This is 16,229 households out of 89,886 homeowners with a mortgage. Another 7,799, or 8.7 percent, experienced a severe cost burden. Furthermore, about 8.5 percent of homeowners without a mortgage experienced a cost burden. This is 2,867 households out of 33,674 homeowners without a mortgage. Another 1,936, or 5.7 percent, experienced a severe cost burden. The detailed city by city information for these two cost burden concepts can be seen in Tables A.9 and A.10 of Appendix A.

It is important to keep in mind that those experiencing a severe cost burden are at risk. For renters, with one financial setback, they are likely to have to choose between a variety of unsatisfactory choices, such as rent versus food or rent versus healthcare for their family. For a homeowner with a mortgage experiencing a severe cost burden, one unforeseen financial requirement, such as temporary illness, divorce, or the loss of employment, may force the homeowner to face foreclosure or bankruptcy. Both of these situations indicate that the householder is at risk of homelessness.

For those households that no longer have a mortgage, yet also experience a severe cost burden, these householders are likely unable to conduct periodic maintenance and repair of their home. Hence, the housing unit is at-risk of dilapidation and contributing to blight. Both these situations should be of concern to HOME policy makers and program managers.

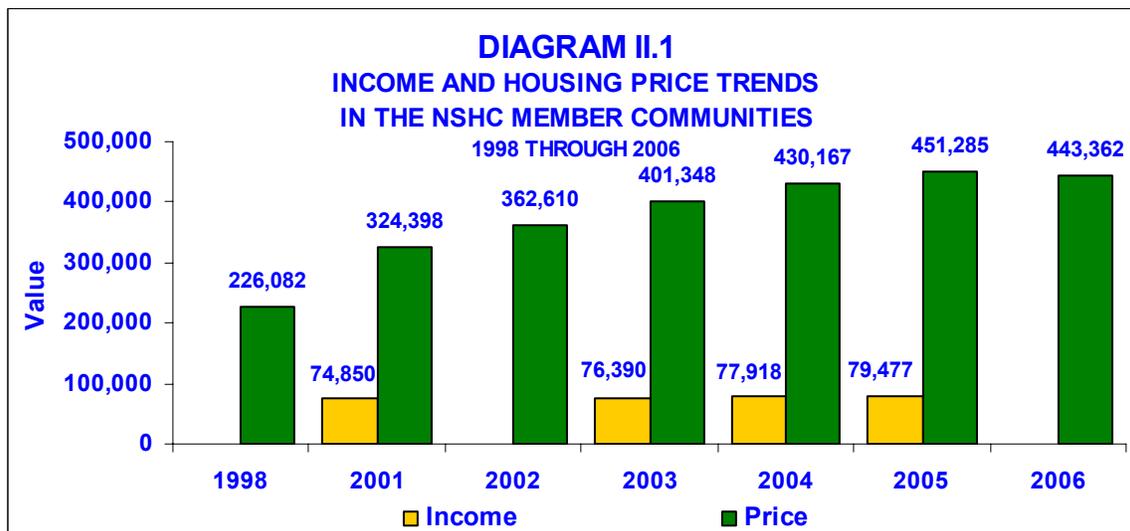
It is important to note that the North Shore compares favorably with Massachusetts, as well as the entire United States, for percentage of cost burdened or severe cost burdened renters. Unfortunately, however, there is a higher percentage of homeowners, both with and without mortgages, that are cost burdened or severely cost burdened in the North Shore than for Massachusetts or the U.S. Table II.10 presents the percentage of households facing a cost burden or severe cost burden in each of two geographic areas: the North Shore and the U.S.

Still, housing costs in the North Shore HOME Consortium area have been increasing rapidly over the last several years. The implication is that the cost burdens identified in the 2000 Census may no longer be an accurate representation of housing costs for the member community residents.

To better view the pace of change in the homeownership market, selected data from the Citizens' Housing and Planning Association were collected.¹⁰ While incomes have been rising about 6 percent between 2001 and 2005, median housing prices have nearly doubled, as seen in Diagram II.1, below. This means that homeownership is continuing to be constrained. For a tabular presentation of all these data by member community, refer to Table A.11 in Appendix A.

**TABLE II.10
HOUSING COST BURDENS
2000 CENSUS**

Degree of Cost Burden	North Shore HOME Con.	United States
Renters		
Cost Burden	18.7	20.8
Severe Cost Burden	15.0	19.1
Homeowners with a Mortgage		
Cost Burden	18.1	17.7
Severe Cost Burden	8.7	9.1
Homeowners without a Mortgage		
Cost Burden	8.5	6.5
Severe Cost Burden	5.7	4.2



SUMMARY

The North Shore HOME Consortium service area tends to have a very low percentage of minority racial and ethnic populations. However, the spatial distribution of this population indicates areas of very high concentration of such populations. The same is true for both the disabled and lower income households. The HOME Consortium area does not have substantive housing condition problems. Still, the increasing costs of housing are drastically outpacing any rises in household income.

¹⁰ Citizens' Housing and Planning Association, *The Greater Boston Report Card, 2005-06, 2004, 2003, and 2002*. Each member community median household price was tabulated. The average of these 30 median prices is presented as an illustration in Diagram II.1.

SECTION III. LENDING PRACTICES

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. Although the record is improving, discriminatory practices have not been entirely eliminated. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 **Fair Housing Act** prohibits discrimination in housing based on race, color, religion, or national origin. Under the FHA, it is illegal to discriminate against any of the protected classes in residential real estate transactions that include making loans to buy, build or repair a dwelling; selling, brokering or appraising residential real estate; or selling or renting a dwelling.

The **Equal Credit Opportunity Act (ECOA)** was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, or the exercise of any right under the Consumer Credit Protection Act.¹¹

The **Community Reinvestment Act (CRA)** was enacted in 1977 to require each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of their entire community—including low- and moderate-income neighborhoods within those communities. New regulations went into effect at the beginning of 1996.

Congress enacted the **Home Mortgage Disclosure Act (HMDA)** in 1975 and amended the act from 1988 through 1991. Under the act, financial institutions are required to report the race, sex, and income of mortgage applicants and borrowers by Census Tract. Analysis presented herein is from the HMDA data system.

Furthermore, HUD works with the lending industry to promote “**Fair Lending-Best Practices Agreements.**” The agreements represent voluntary efforts to improve individual banks’ performance in providing homeownership opportunities to minorities and low-income persons by eliminating discriminatory barriers.

HOME MORTGAGE DISCLOSURE ACT DATA ANALYSIS

The Home Mortgage Disclosure Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans. Under the act, financial institutions are required to report the race, sex, loan amount, and income of mortgage applicants and borrowers by Census Tract. The data is considered “raw,” in that there are data entry errors occasionally evident as well as incomplete loan applications included in the data.

¹¹ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

Nevertheless, reporting institutions must meet a set of criteria for being required to report. For depository institutions these are:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;¹²
3. The institution must have had a home or branch office in an MSA;
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one-to-four-family dwelling;
5. The institution must be federally insured or regulated; and,
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and,
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

Hence, most mortgage lending activity is included in the HMDA data and this information represents the most comprehensive collection of information regarding home purchase originations, home remodel loan originations, and refinancing available. Furthermore, since data is available by Census Tract, information specific to the North Shore HOME Consortium member communities has been extracted from the data system.

For example, as presented in Table III.1, HMDA information has been defined for the North Shore over the six year period from 2000 through 2005. During this time, over 425,000 loan applications were processed for home purchases, home improvements, refinancing mortgages, and multifamily properties.¹³ Nearly 105,000 of these loan applications were specifically for home purchases.

TABLE III.1
HOME MORTGAGE DISCLOSURE ACT DATA
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Year	Home Purchase	Home Improvement	Refinance	Multi-family	Total Loan Applications
2000	15,279	3,265	14,019	117	32,680
2001	15,128	3,535	45,736	141	64,540
2002	15,253	3,621	65,163	173	84,210
2003	17,143	2,622	95,660	197	115,622
2004	20,358	4,348	42,293	.	66,999
2005	21,211	4,411	35,665	.	61,287
Total	104,372	21,802	298,536	628	425,338

¹² Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

¹³ A technical discussion of the selection process and identification of all selected Census Tracts is presented in Appendix B: Home Mortgage Disclosure Act Data.

As seen in Table III.2, of the 104,372 loan applications for home purchases in the North Shore, about 93 percent, or over 97,500, were for owner occupied homes. The number of owner occupied loan applications was highest in 2005, at some 19,519. This was a 35 percent increase between 2000 and 2005.

However, 2001 and 2002 saw a decrease in applications from 2000, although the number of applications rebounded in 2003. This discussion will focus on loan applications for owner occupied homes.

Table III.3, below, segments these owner occupied loans between conventional lenders and those handled through FHA, VA, and rural or farm service agencies. Some 95.5 percent of the loans were handled by conventional lenders, with these lenders handling some 98.9 percent in 2005. The share of FHA and VA loan applications has declined substantively.

TABLE III.2
HOME MORTGAGE DISCLOSURE ACT DATA
HOME PURCHASE LOAN APPLICATIONS
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Year	Owner Occupied	Not Owner Occupied	Not Available	Total Loan Applications
2000	14,454	785	40	15,279
2001	14,292	801	35	15,128
2002	14,277	928	48	15,253
2003	16,077	1,026	40	17,143
2004	18,892	1,352	114	20,358
2005	19,519	1,590	102	21,211
Total	97,511	6,482	379	104,372

TABLE III.3
HOME MORTGAGE DISCLOSURE ACT DATA
OWNER OCCUPIED HOME LOAN APPLICATIONS BY LOAN TYPE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Year	Conventional	FHA Insured	VA Guaranteed	Rural Housing or Farm Service Agency	Total
2000	13,329	998	122	5	14,454
2001	13,173	1,006	112	1	14,292
2002	13,464	755	56	2	14,277
2003	15,313	714	49	1	16,077
2004	18,490	383	18	1	18,892
2005	19,308	175	34	2	19,519
Total	93,077	4,031	391	12	97,511

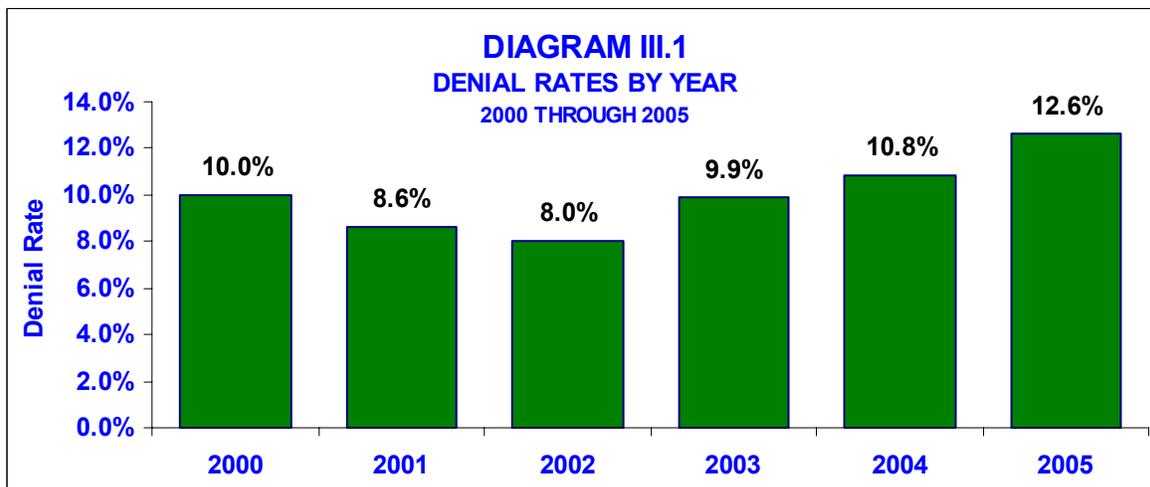
Financing institutions can take one of several actions pertaining to the mortgage loan application. "Originated" indicates that the loan was made by the lending institution. "Approved but not accepted" represents loans approved by the lender, but not accepted by the applicant. This generally occurs if better terms are found at another lending institution. "Application denied by financial institution" defines a situation where the loan application failed. "Application withdrawn by applicant" means that the applicant closed the application process. "File closed for incompleteness" means that the loan application process was closed by the institution due to incomplete information. "Loan purchased by the institution" indicates that the previously originated loan was purchased on the secondary market.

For the purposes of this analysis, only loan originations and loan denials are inspected, as an indicator of the underlying success or failure of home purchase loan applicants. Table III.4 presents these data over the six-year period. Altogether, there were some 56,572 loan originations and about 6,387 loan denials. While this may at first sound like a large number of loan denials, this is not the case when viewing the overall number of applications inspected. In fact, the six year denial rate is a respectable 10.1 percent.

TABLE III.4
HOME MORTGAGE DISCLOSURE ACT DATA
LOAN ACTION TAKEN ON OWNER OCCUPIED HOME LOAN APPLICATIONS
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Year	Loan Originated	Approved But Not Accepted	Loan Denied	With drawn by Applicant	Closed for Incomplete ness	Loan Purchased by the Institution	Missing Reason	Total	Average Denial Rate
2000	8,797	887	980	785	139	2,866	.	14,454	10.0%
2001	8,897	823	842	713	118	2,899	.	14,292	8.6%
2002	8,451	792	738	758	168	3,370	.	14,277	8.0%
2003	9,017	855	994	844	107	4,259	1	16,077	9.9%
2004	10,777	1,071	1,303	1,127	222	4,392	.	18,892	10.8%
2005	10,633	941	1,530	1,494	298	4,615	8	19,519	12.6%
Total	56,572	5,369	6,387	5,721	1,052	22,401	9	97,511	10.1%

Still, over the last few years, the denial rates have been edging upward, rising some 4.6 percentage points in the last four years, as seen in Diagram III.1, below. This is a somewhat disconcerting trend. Detailed information about lending patterns in the member communities can be found in Appendix B.



Even though the average denial rate was a low and fairly consistent 10.1 percent, there is a slight difference between males and females, with males slightly less likely to face a loan denial, as seen in Table III.5, below. The table does indicate, however, that the difference between male and female loan denial is narrowing, dropping from a 2.4 percentage point difference in 2000 to a 0.5 percent difference in 2005. The rate did jump briefly in 2004, however, so the trend is not entirely clear yet.

TABLE III.5
HOME MORTGAGE DISCLOSURE ACT DATA
DENIAL RATES ON HOME LOAN APPLICATIONS: OWNER OCCUPIED HOMES BY GENDER
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Gender	2000	2001	2002	2003	2004	2005	Total
Male	9.0%	7.7%	7.1%	9.4%	10.1%	12.2%	9.4%
Female	11.4%	9.6%	8.6%	10.3%	11.6%	12.7%	10.9%
Total	10.0%	8.6%	8.0%	9.9%	10.8%	12.6%	10.1%

Table III.6 presents denial rates by race and ethnicity. Whites and Asians have tended to have much lower denial rates than any of the other races, with averages of 9.2 and 8.6 percent, respectively. Very few American Indian/Alaskan Natives made application in the North Shore, even though the percentages appear high; hence, further discussion of this group will not appear. On the other hand, sufficient numbers of blacks and Hispanics made application for mortgage loans over the period, and the denial rates for these groups tend to be somewhat high. In 2005, both experienced denial rates in excess of 21 percent.

TABLE III.6
HOME MORTGAGE DISCLOSURE ACT DATA
DENIAL RATES ON HOME LOAN APPLICATIONS: OWNER OCCUPIED HOMES BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	2000	2001	2002	2003	2004	2005	Total
American Indian/Alaskan Native	14.3%	26.3%	14.3%	10.0%	32.5%	9.5%	19.9%
Asian or Pacific Islander	9.1%	2.6%	7.8%	7.5%	13.6%	7.6%	8.6%
Black	15.1%	21.6%	15.7%	27.7%	16.1%	22.3%	20.1%
Hispanic race ¹⁴	17.9%	17.8%	12.8%	24.7%	.	.	18.8%
White	9.1%	7.6%	6.8%	8.6%	10.0%	11.7%	9.2%
Other	16.3%	12.2%	16.2%	17.9%	.	.	15.4%
Total	10.0%	8.6%	8.0%	9.9%	10.8%	12.6%	10.1%
Hispanic Ethnicity	18.8%	21.5%	20.4%

Part of the HMDA data includes information about the reason for the loan denial. Unfortunately, the financial institutions are not required to fill out this field, so there are missing data elements in this data field. Nevertheless, the category with the largest number of denials pertained to credit history, as seen in Table III.7. Consumers are still stymied by this issue. The next most frequent reason pertained to debt-to-income, in fact the most reported reason in 2003 and 2004, indicating that many households lacked sufficient income to carry the accumulated level of debt they would have after addition of a mortgage. Certainly, a better understanding of the credit markets, the importance of a good credit history, and improved debt management would help to lower these statistics.

TABLE III.7
HOME MORTGAGE DISCLOSURE ACT DATA
DENIED HOME LOAN APPLICATIONS: OWNER OCCUPIED HOMES BY DENIAL REASON
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Denial Reason	2000	2001	2002	2003	2004	2005	Total
Debt-to-income Ratio	202	175	155	195	208	208	1,143
Employment History	16	16	18	21	24	22	117
Credit History	244	190	161	158	182	222	1,157
Collateral	77	61	72	75	126	144	555
Insufficient Cash	30	34	29	44	46	31	214
Unverifiable Information	21	20	22	69	86	115	333
Credit Application Incomplete	86	81	56	128	152	180	683
Mortgage Insurance Denied	4	2	3	1	1	.	11
Other	111	114	116	152	231	276	1,000
Missing Reason	189	149	106	151	247	332	1,174
Total	980	842	738	994	1,303	1,530	6,387

¹⁴ Starting in 2004, HMDA discontinued reporting Hispanics as a race. Hispanics were categorized separately as an ethnicity. This ethnicity category may include people of any race. Hence, there is a discontinuity in the numbers reported under the Hispanic race category. For comparison with data in earlier years, the 2004 data in the main section of this report includes persons in the Hispanic ethnicity category. The data tables in the Appendix separate, persons by race and ethnicity separately.

A review of which groups are experiencing the greatest level of “missing denial reason” was undertaken in order to evaluate whether various races are being treated differently in the lending markets. The group with the greatest share of missing reason codes tends to be Hispanics, followed closely by blacks, as noted in Table III.8, below.

TABLE III.8
HOME MORTGAGE DISCLOSURE ACT DATA
DENIAL REASONS BY RACE: NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Denial Reason	Native American	Asian	Black	Hispanic Race	White	Other	Not Provided	Not Available	Total	Hispanic Ethnicity
Debt-to-income Ratio	9	12	32	53	879	7	149	2	1,143	44
Employment History	3	4	2	3	90	2	12	1	117	10
Credit History	1	25	21	45	893	7	164	1	1,157	34
Collateral	2	11	12	21	432	2	75	.	555	29
Insufficient Cash	.	4	3	10	169	2	25	1	214	4
Unverifiable Information	3	7	7	10	251	4	46	5	333	25
Credit Application Incomplete	1	16	13	13	529	3	106	2	683	20
Mortgage Insurance Denied	11	.	.	.	11	1
Other	6	27	31	34	713	11	176	2	1,000	54
Missing Reason	4	27	42	39	818	7	237	.	1,174	78
Total	29	133	163	228	4,785	45	990	14	6,387	299
Percent Missing Denial Reason	13.8%	20.3%	25.8%	17.1%	17.1%	15.6%	23.9%	.	18.4%	26.1%

The HMDA data also contains the household income of the loan applicant. Denial rates by race and ethnicity were then segmented by level of income over the six-year period. This was to determine whether, if normalized by level of income, there were still differences between the denial rates for black and Hispanic householders. Table III.9 presents this data. As seen therein, nearly all householders with lower incomes have high denial rates, although minority denial rates are still much higher than for whites. As incomes rise, denial rates drop, but the rates do not drop as quickly for blacks as for the other races, and the denial rates are roughly higher at higher incomes for blacks than for the other races. Hispanics, also, have fairly high denial rates regardless of income.

TABLE III.9
HOME MORTGAGE DISCLOSURE ACT DATA
DENIAL RATES ON HOME LOAN APPLICATIONS BY SELECTED INCOME CATEGORIES AND BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Data Missing	Less than \$30,000	\$30,000- \$50,000	\$50,000- \$80,000	\$80,000- \$100,000	\$100,000- \$150,000	More than \$150,000	Total
American Indian/Alaskan Native	.	42.9%	23.8%	27.3%	11.1%	20.8%	9.1%	19.9%
Asian or Pacific Islander	15.5%	33.3%	10.3%	11.9%	9.3%	4.5%	5.2%	8.6%
Black	8.3%	28.6%	16.2%	20.9%	28.5%	11.6%	21.1%	20.1%
Hispanic race	16.8%	39.7%	18.2%	19.1%	17.6%	10.1%	8.5%	18.8%
White	12.8%	23.3%	12.3%	9.2%	7.6%	7.1%	7.2%	9.2%
Other	33.3%	43.8%	20.0%	14.4%	9.8%	2.1%	16.7%	15.4%
Total All Lenders	14.9%	26.9%	13.4%	10.4%	8.5%	7.5%	7.7%	10.1%
Hispanic Ethnicity	19.2%	44.4%	23.2%	19.9%	20.8%	16.9%	9.1%	20.4%

These owner occupied home loan applications have also been segmented by lender type. Lender types have been identified by their major type of lending activity: subprime, manufactured home, or “all other,” herein termed prime lenders. Some lenders that are classified as prime may indeed have sub-prime or manufactured home lending products.

Nevertheless, the intent is to see if there are differences in denial rates or loan amounts between these types of lenders within discrete income groupings. Denial rates were then compared between these types of lenders in the North Shore.¹⁵

Table III.10, at right, compares prime and subprime lender markets over the 6-year period. During these 6 years, subprime lending activity has expanded sharply, jumping from 512 applications in 2000 to 2,252 in 2005. The prime lending market is still larger, however, with some 9,911 loan applications occurring in 2005. As well, as seen above, denial rates for prime lenders are very low, an average of 8 percent, at the same time that subprime lenders tend to have a much higher denial rate, exceeding 28 percent over the last six years.

TABLE III.10
HOME MORTGAGE DISCLOSURE ACT DATA
HOME LOAN APPLICATIONS: OWNER OCCUPIED HOMES BY LENDER TYPE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Application Action	2000	2001	2002	2003	2004	2005	Total
Prime Lenders							
Loan Originated	8,449	8,566	8,120	8,419	9,649	8,966	52,169
Application Denied	757	630	582	711	888	945	4,513
Denial Rate	8.2%	6.9%	6.7%	7.8%	8.4%	9.5%	8.0%
Subprime Lenders							
Loan Originated	338	325	329	597	1,128	1,667	4,384
Application Denied	174	154	135	270	415	585	1,733
Denial Rate	34.0%	32.2%	29.1%	31.1%	26.9%	26.0%	28.3%

A comparison by lender type of the denial rates by race and ethnicity was conducted as well. As noted in Table III.11, below, the subprime lenders tend to have significantly higher denial rates across the board, with denials for white and black loan applicants nearly the same, around 25 percent.

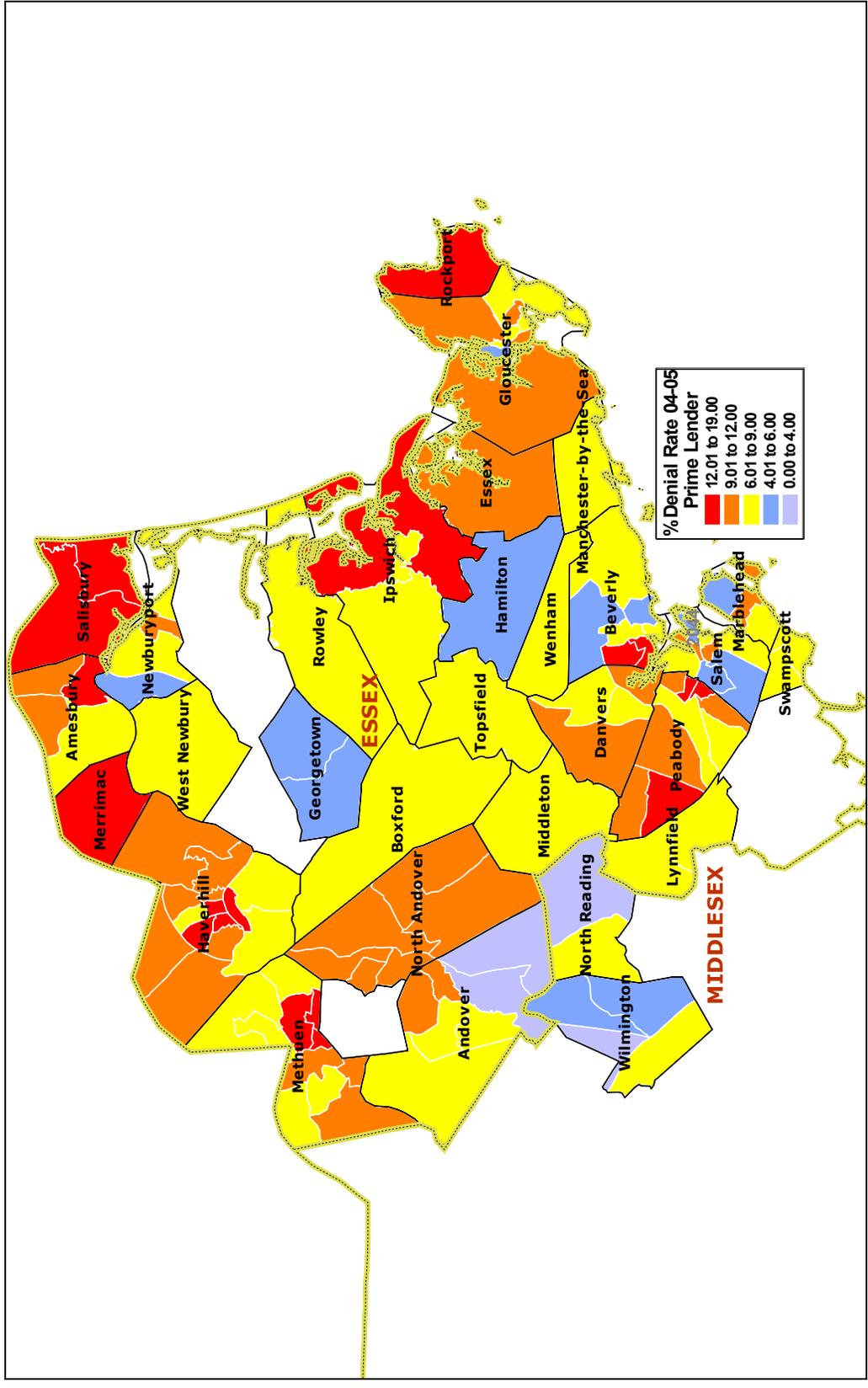
However, when these data are more carefully inspected by geographic location, some Census Tracts have extremely high denial rates. This tends to raise questions about the geographic distribution of lending throughout the North Shore HOME Consortium area. The denial rates by lender type were mapped by Census Tract, with prime lenders presented in Map III.1, on the following page. As noted therein, a few Census Tracts have higher rates of denial, one each in Haverhill, Methuen, and Peabody at about 18 percent, but all other Census Tracts have denial rates by prime lenders that are less than this amount.

TABLE III.11
HOME PURCHASE DENIAL RATES BY LENDER
HMDA DATA 2000-2005

Race	Denial Rates by Lender Type	
	Prime	Subprime
Native American	14.0%	38.7%
Asian	7.4%	24.1%
Black	16.9%	25.9%
Hispanic	15.1%	37.7%
White	7.4%	25.2%
Other Race	12.7%	34.4%
Average	8.0%	28.3%
2004 - 05 Hispanics	17.0%	24.1%

¹⁵ Starting from 2004 the HMDA data includes an additional variable, "property type" – 1-4 family housing, manufactured housing, and multifamily housing. While manufactured home lending activity can be identified starting from 2004, it is no longer possible to identify lenders whose primary line of loan activity pertains to manufactured homes. Consequently, this perspective has been dropped from further consideration.

MAP III.1
NORTH SHORE REGION BY CENSUS TRACT
HOME MORTGAGE DISCLOSURE ACT – PRIME LENDER DENIAL RATES IN NORTH SHORE: 2004-2005



The geographic concentration of subprime lender denial rates is different than for the prime lenders, as seen in Map III.2 on the preceding page. Some of the subprime denial rates in selected Census Tracts are very high. One subprime application in Wilmington was denied, resulting in a 100 percent denial rate. However, Salisbury, Merrimac, Gloucester, and Swampscott all have appreciable subprime application activity yet also have very high denial rates, all exceeding 50 percent, with Salisbury above 65 percent.

Furthermore, it appears that these subprime lenders are targeting minority householders. As noted in Table III.12, below, a much greater share of loans that were originated by subprime lenders were directed to minority households. Prime lenders had less than 1 percent of their originations directed to black householders, but subprime lenders had nearly 5 percent. Even more striking are the Hispanic householders, where nearly 19 percent of the loans were originated by subprime lenders, compared with less than 4 percent by the prime lenders.

TABLE III.12
PERCENT SHARE OF ORIGINATIONS BY LENDER TYPE BY RACE
HMDA 2000-2005

	2000	2001	2002	2003	2004	2005	Total
Prime Lenders							
Race/Ethnicity							
American Indian	0.34%	0.15%	0.21%	0.08%	0.21%	0.13%	0.19%
Asian	2.19%	2.12%	2.60%	1.84%	3.05%	3.26%	2.53%
Black	0.64%	0.75%	0.57%	0.59%	1.02%	1.35%	0.83%
Hispanic Race	2.37%	2.35%	2.80%	2.73%			1.64%
White	86.61%	83.61%	81.35%	83.58%	84.49%	86.45%	84.39%
Other	0.72%	0.81%	0.69%	0.48%			0.43%
Not Provided	7.10%	10.14%	11.75%	10.63%	10.90%	8.78%	9.89%
Non Applicable	0.02%	0.07%	0.04%	0.06%	0.34%	0.03%	0.10%
Total	100.00%						
Hispanic Ethnicity					3.07%	3.89%	3.46%
Subprime Lenders							
American Indian	0.30%	0.31%	0.30%	0.34%	0.62%	0.42%	0.43%
Asian	1.48%	1.54%	0.91%	1.01%	2.75%	2.28%	2.01%
Black	2.07%	1.54%	3.95%	3.02%	5.67%	6.30%	4.84%
Hispanic Race	4.44%	4.92%	9.42%	10.39%			2.83%
White	79.88%	74.77%	73.25%	69.68%	78.90%	83.86%	78.88%
Other	1.78%	0.92%	1.82%	1.01%			0.48%
Not Provided	10.06%	15.69%	10.33%	14.57%	11.79%	7.14%	10.45%
Non Applicable		0.31%			0.27%		0.09%
Total	100.00%						
Hispanic Ethnicity					17.91%	19.38%	18.78%

SUMMARY

Racial and ethnic minorities, especially blacks and Hispanics, face much higher rates of mortgage application denials for homeownership than do whites. This is true even after comparing income across racial and ethnic groups. Still, the reason most frequently offered regarding denials relates to lack of sufficient quality in credit, even though the denial reasons appear to be missing in greater frequency for selected minorities. Furthermore, the subprime lending market has expanded quickly over the last few years and tends to market more often to racial and ethnic minority householders.

SECTION IV. FAIR HOUSING AGENCIES AND PROGRAMS

The following narrative provides an enumeration of key agencies and organizations contributing to affirmatively furthering fair housing for the North Shore HOME Consortium; it concludes with a succinct review of related national housing studies.

MAJOR FAIR HOUSING AGENCIES AND ORGANIZATIONS

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers, and enforces the Fair Housing Act. HUD's Region I office in Boston oversees housing, community development, and fair housing enforcement in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.¹⁶ The Office of Fair Housing and Equal Opportunity (FHEO), within HUD's Boston office, enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in the North Shore HOME Consortium jurisdictions, as well as the rest of Massachusetts, Connecticut, Maine, New Hampshire, Rhode Island and Vermont. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance (FHAP) and Fair Housing Initiative (FHIP) programs.¹⁷

Fair Housing Assistance Programs and Fair Housing Initiative Programs

In the United States, many agencies receive funding directly from HUD as FHAPs or FHIPs. The fundamental difference between the two programs is that FHAP programs require an ordinance or law that empowers a governmental agency to enforce the Fair Housing Act; they are thus considered "substantially equivalent" to federal agency enforcement activities. HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis.¹⁸ FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

FHIPs, on the other hand, may be a government agency, a private non-profit or for-profit organization. This competitive grant program provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with the Fair Housing Act. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities, as well as enforcement

¹⁶ <http://www.hud.gov/local/index.cfm?state=ma&topic=offices>

¹⁷ <http://www.hud.gov/local/shared/working/r1/fheo/index.cfm?state=ma>

¹⁸ <http://www.hud.gov/offices/fheo/progdesc/title8.cfm>

of fair housing complaints, including testing and litigation. In 2005, the FHIP program awarded \$18.04 million in the following three types of grants across the nation:

Private Enforcement Initiative (PEI) grants: About \$13.6 million was awarded in grants of up to approximately \$275,000 to assist 61 private, tax-exempt fair housing enforcement organizations in the investigation and enforcement of alleged violations of the Fair Housing Act and substantially equivalent state and local fair housing laws. About \$3.4 million of the \$13.6 million was allocated for 13 groups that received funding for three years, based upon appropriations, that will allow them to implement strategic plans and develop long-term systemic investigations.

Education and Outreach Initiative (EOI) grants: About \$3.94 million was allocated for one-year grants of up to \$100,000 to inform and educate the public about their rights and obligations under federal, state and local fair housing laws. Within that total amount, about \$800,000 went to nine groups that focus on the needs of people with disabilities. Of the total EOI funding, HUD awarded \$400,000 to four groups that focus on education for Asians and Pacific Islanders.

Fair Housing Organizations Initiative (FHOI) grants: HUD awarded \$500,000 to The Housing Discrimination Project, Inc. in Central Massachusetts to develop a new fair housing organization that will serve rural and immigrant populations in underserved areas or where there currently is not an existing fair housing organization.

In 2006, the FHIP program awarded \$18.1 million for two types of grants across the nation:

Private Enforcement Initiative grants (PEI) - HUD awarded \$13.9 million to assist groups in the investigation and enforcement of alleged violations of the Fair Housing Act and substantially equivalent state and local fair housing laws.

Education and Outreach Initiative grants (EOI) - HUD awarded \$4.2 million to groups that educate the public and housing providers about their rights and obligations under federal, state, and local fair housing laws.

The 2007 FHIP Notice of Funds Availability has been released by HUD. It indicates that approximately \$18.1 million will be available for grant applications, to have been received by June 13, 2007. Some \$14 million is devoted to PEI grants, with the remainder as EOI grants.¹⁹

Recent Massachusetts FHIP Grant Recipients

HUD awards these grants competitively to enable not-for-profit organizations to provide education and outreach activities to promote the Fair Housing Act. The following succinctly identifies the FHIP grants being awarded in Massachusetts.

¹⁹ <http://www.hud.gov/offices/adm/grants/nofa07/grpfnip.cfm>; <http://www.hud.gov/offices/adm/grants/nofa07/fhipsec.pdf>

In 2004, \$79,971 was awarded to HAP, Inc. to provide outreach, accessibility education and advocacy services to low and moderate income families and individuals in Hampden and Hampshire counties in Western Massachusetts. Directly applicable to the North Shore HOME Consortium, The Fair Housing Center of Greater Boston, Inc. received \$219,996 to provide education, outreach and investigative services for families and individuals in all protected classes in the greater Boston area, including Essex, Middlesex, Norfolk, Plymouth, and Suffolk counties.²⁰

In 2005, three Massachusetts entities received PEI grants. As reported by HUD, the Fair Housing Center of Greater Boston, Inc. received a grant of \$274,167; The Housing Discrimination Project, Inc. received a grant of \$220,000; and the Legal Assistance Corp. of Central Massachusetts received a grant of \$220,000. The FHOI grant to the Housing Discrimination Project was also made this year.

In 2006, The Housing Discrimination Project, Inc. received a PEI grant of \$275,000 to conduct educational workshops, testing and investigative services to address rental discrimination against minorities, persons with disabilities and persons with limited English proficiency. The City of Newton, MA received a PEI grant of \$98,044 to partner with the Fair Housing Center of Greater Boston to develop education and outreach materials in English, Spanish, Chinese, and Russian to be distributed among 14 communities. Finally, the Fair Housing Center of Greater Boston, Inc. received a Performance Based PEI grant of \$274,167 to provide investigative and testing services for the Greater Boston area.

Creating A FHAP - A Substantially Equivalent Agency

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to the federal Fair Housing Act. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington D.C. for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it was substantially equivalent to federal fair housing law.

When substantially equivalent status has been granted, complaints of housing discrimination are dually filed with the state (or local agency) and with HUD. The state or local agency investigates most complaints; however, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

²⁰ <http://www.hud.gov/offices/fheo/partners/FHIP/FY2005FHIP.cfm#ma>; Note: HUD also indicates in a press release dated January 12, 2003, but linked to January 12, 2004, two other groups also were to receive grants: \$206,490 for the Housing Discrimination Project and \$45,077 for Pro-Home, Inc. in Taunton, MA. <http://www.hud.gov/local/ma/library/archives/localnews/pr2004-01-12.cfm>

In the North Shore HOME Consortium jurisdiction, the Massachusetts Commission Against Discrimination (MCAD) is the one designated substantially equivalent agency for the pursuit of federal fair housing violations.

REGIONAL FAIR HOUSING AGENCIES AND ORGANIZATIONS

There is one fair housing agency that is currently active in the North Shore HOME Consortium jurisdiction. The Fair Housing Center of Greater Boston, which serves the communities of Essex, Middlesex, Norfolk, Plymouth, and Suffolk counties, is the only private, non-profit organization devoted to fair housing issues in the Greater Boston region. The Fair Housing Center has staff dedicated specifically for the North Shore region. The Fair Housing Center educates and performs outreach to the general public, as well as housing providers, about fair housing issues. In addition, the Center performs investigative research, enforces fair housing laws through testing, assistance and legal action and advocates for fair housing laws and policies.

According to information provided on the Fair Housing Center Web site, the Center describes each of its roles and functions, as follows:

Education and Outreach

Fair housing laws are some of the strongest civil rights statutes on the books, but they are only as good as their enforcement. Since fair housing enforcement is complaint driven, it is critical that people who experience discrimination file complaints. This means people who may experience discrimination as well as advocates who work with them must be familiar with fair housing law and its enforcement. When people do not know their rights or the procedures for filing complaints, housing discrimination remains unreported and therefore uncorrected, allowing larger patterns of denial and limited housing access to remain unchanged.

The Fair Housing Center conducts outreach to educate individuals, families, and housing professionals about their fair housing rights and responsibilities through organizations they know, trust, and use. Current examples of these education and outreach programs in action include:

Training for housing search advocates, Section 8 leasing staff, and homebuyer counselors on basic fair housing law, how to spot potentially discriminatory practices, and how to inform and advocate for their clients who are likely to be experiencing discrimination in their housing searches.

Writing a component of the Massachusetts Homebuyer Collaborative first time homebuyer curriculum to inform home seekers of their fair housing rights when looking to purchase a home and, for those purchasing multifamily buildings, their fair housing responsibilities as landlords.

Conducting fair housing training for real estate professionals through direct contracts with real estate firms as well as through the Greater Boston Real Estate Board's continuing education series. Additionally, the Fair Housing Center hosts trainings for real estate professionals and property owners who must receive court mandated training.

Enforcement

The Fair Housing Center's studies have documented discrimination against African Americans, Latinos, families with children, and rental subsidy holders in one half to two thirds of their attempts to find rental housing. Their growing case load of people pursuing discrimination complaints confirms these findings. The Fair Housing Center advocates for people who have experienced discrimination, either through the HUD, MCAD or court systems, to bring about positive resolution.

In the past year alone, case outcomes have included financial settlements for families who were denied housing, training requirements for landlords and Realtors found in violation of the law, and one family obtaining the unit they wanted. The Fair Housing Center itself has also received monetary settlements and affirmative relief from the *Boston Metro* and the *Revere Journal* newspapers for the publication of discriminatory advertisements.

A key component of the Fair Housing Center's enforcement efforts is investigating discrimination complaints through testing. Testing is one of the most effective ways of uncovering discrimination. Quite simply, a test is designed to reveal differences in treatment and to isolate the cause of that difference. Testers are matched on personal and home seeking characteristics so that the significant difference between them is the factor being tested.

In addition to testing for discrimination complaints, the Fair Housing Center conducts systemic investigations of discrimination in the region for research and enforcement purposes. On January 23rd, 2004, the Fair Housing Center released preliminary results of its investigation into sales discrimination. Disturbingly, all of the tests showed differences in treatment between testers of color and white testers. While not all of these differences rise to the level of discrimination, they were significant enough to warrant further study. These preliminary sales discrimination results were released in conjunction with the Harvard Civil Rights Project's series of studies: "Toward Real Residential Choice in Segregated Metro Boston."

Public Policy Advocacy

The Fair Housing Center pursues its public policy agenda through active participation in coalitions, including the Massachusetts Community Banking Council, the Boston Tenant Coalition, the Greater Boston Civil Rights Coalition, and the Massachusetts Association of Human Rights Commissions, to bridge housing and civil rights advocacy.

This fall, the Fair Housing Center worked closely with the Harvard Civil Rights Project to release a series of studies: "Toward Real Residential Choice in Segregated Metro Boston."

One of these studies, "More than Money," debunks the common explanation that people of color simply cannot afford to buy homes in the suburbs. The findings clearly demonstrate that people of color can afford to purchase homes in many more communities than they do. The implications of this analysis should have significant impact on state policy for housing development.

In the past year, the Fair Housing Center joined the Massachusetts Smart Growth Alliance. Joining with the Boston Society of Architects, CHAPA, the Conservation Law Foundation, the Environmental League of Massachusetts, the Massachusetts Association of CDCs, and the Metropolitan Area Planning Council, the Alliance promotes changes on the statewide level to advance equitable sustainable development for the Commonwealth.

In addition, Fair Housing Center staff and board members have sought to increase the Commonwealth's attention to its fair housing obligations by meeting with state officials and offering testimony on the fair housing implications of proposed legislation. This work has been extended by the efforts of several board members who have worked to insert the fair housing agenda into the policy debates in which they are otherwise involved.

The Fair Housing Center of Greater Boston can be contacted at:
59 Temple Place #1105
Boston, MA 02111
Phone: 617-399-0491
<http://www.bostonfairhousing.org>

NORTH SHORE LEGAL RESOURCES ON FAIR HOUSING

Massachusetts Legal Services offers advice and resources about legal issues to lower-income Massachusetts residents and to their advocates and social service professionals. Massachusetts Legal Services will point people concerned that they may have been discriminated against to local legal representation. In the North Shore, although not serving all of the Consortium member communities, is Merrimac Valley Legal Services,²¹ a legal aid program which provides free legal advice and representation in civil legal cases on housing discrimination claims, among many other things, to low-income and elderly residents of parts of Essex and Middlesex counties.

Neighborhood Legal Services, in the City of Lynn, is a free provider of civil legal assistance for low income residents of Essex County involving access to housing, access to public

²¹ 35 John Street, Suite 302, Lowell, MA 01852-1101; 1-800-336-2262; <http://www.mvlegal.org/>

assistance, economic development of the area's low income communities, and other legal assistance.²²

Senior citizens (age 60 and older) in Wilmington and North Reading, Middlesex County, have access, as well, to Greater Boston Legal Services,²³ which will provide assistance on housing and tenant rights.

The Lawyers' Committee for Civil Rights Under Law of the Boston Bar Association²⁴ is a private, nonprofit, nonpartisan legal organization that provides pro bono legal representation to victims of discrimination based on race or national origin. The Committee undertakes major fair housing law reform litigation as well as representation of individual victims of housing discrimination.

LOCAL FAIR HOUSING AGENCIES AND ORGANIZATIONS

Many of the member communities in North Shore have volunteer committees that support and offer community education about Fair Housing. These community Fair Housing Committees also frequently are committed to affordable housing issues.

RELATED NATIONAL AND LOCAL FAIR HOUSING STUDIES

In 2000, The United States Department of Housing and Urban Development (HUD) released a publication entitled "Discrimination in Metropolitan Housing Markets" (HDS2000), measuring the prevalence of housing discrimination based on race or color in the United States. The third nationwide effort to measure discrimination against minority home seekers since 1977, HDS2000 measured discrimination in metropolitan areas with populations greater than 100,000 and with significant black, Hispanic, and/or Native American minorities. The study found that discrimination persists in both rental and sales markets of large metropolitan areas nationwide, but that its incidence has generally declined since 1989. The exception was for Hispanic renters, who faced essentially the same incidence of discrimination in 2000 as they did in 1989.

In April of 2002, HUD released another national study, "How Much Do We Know?" The study found that public knowledge of discriminatory activities was limited, with just one half of the general public able to identify six or more of the eight scenarios describing illegal conduct. In addition, 14 percent of the nationwide survey's adult participants believed that they had experienced some form of housing discrimination in their lifetime. The study also found that few people had reported this discrimination, with most "seeing little point in doing so."²⁵

²² <http://www.neighborhoodlaw.org/cat/1349>

²³ 197 Friend St., Boston, MA 02114; 1-800-323-3205, <http://www.gbls.org/>

²⁴ 294 Washington Street, Suite 443, Boston, Massachusetts 02108; 617-482-1145; <http://www.lawyerscom.org>

²⁵ *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at <http://www.huduser.org/Publications>.

In its 2004 Fair Housing Trends Report, the National Fair Housing Alliance (NFHA) states that discrimination based on national origin is largely underreported, specifically by Hispanics, Asian-Americans, and Native Americans. This is due, they state, to “language barriers and other cultural issues which could include immigration status, hesitancy to challenge authority, and a general lack of faith in the justice system.”²⁶

It is possible that the length of time necessary to reach complaint resolution may also deter complainants, as pointed out in the U.S. General Accounting Office’s (GAO) 2004 report, titled “Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process.” The GAO report found that, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 days for HUD’s Fair Housing and Equal Opportunity Offices and 195 days for FHAP agencies. The report did find a higher percentage of investigations completed within the Fair Housing Act’s 100-day mandate.²⁷

The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year showed a steady increase since 1998. An increasing proportion of complaints alleged discrimination based on disability, and a declining proportion of complaints alleged discrimination based on race, though race was still the most cited basis of housing discrimination over the period.
- FHAP agencies conducted more fair housing investigations than FHEO agencies over the period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed over the period, with an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

In January of 2005, the Center for Community Capitalism at The University of North Carolina at Chapel Hill (UNC) reported that predatory loan terms increase the risk of mortgage foreclosure in subprime home loans. The study examined recent home mortgages while holding terms the same such as credit scores, loan terms, and varying economic conditions. Conditions in the home mortgage industry have led to predatory lending practices. Previous studies have found a correlation between subprime lending and foreclosures. This study specifically demonstrates that prepayment penalties and balloon payments lead to additional home losses.²⁸ For example, in the prime lending market only 2 percent of home loans carry prepayment penalties of any length. Conversely, up to 80 percent of all subprime mortgages carry a prepayment penalty, a fee for paying off a loan

²⁶ 2004 Fair Housing Trends Report, National Fair Housing Alliance, Pg. 8. Available at www.nationalfairhousing.org.

²⁷ Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process, United States General Accounting Office, Report to Congressional Requesters, April 2004.

²⁸ <http://www.kenan-flagler.unc.edu/assets/documents/foreclosurerelease.pdf>

early. An abusive prepayment penalty extends more than 3 years and/or costs more than six months' interest.²⁹

The article further explains that, according to Fannie Mae, 51 percent of refinance mortgages are in predominantly African-American neighborhoods compared to only 9 percent of refinances in predominantly Caucasian neighborhoods. Thus, targeting minorities seems to be an abusive practice in the lending industry. The study also found that consumers appear to be unaware of avoiding "mandatory arbitration." This clause in home mortgage contracts prevents consumers from seeking remedies in court when they find that their home is threatened by illegal and abusive terms.

Increases in foreclosures and evictions are extremely costly to both individual consumers and neighborhoods. Those who are experiencing a severe cost burden are only one step away from being at risk of homelessness. With one financial setback, such as an auto accident, a medical emergency, or a job layoff, homeowners are not able to conduct normal and periodic maintenance on their homes, thereby contributing to a blighting influence. Similarly, increased foreclosures lead to blight in neighborhoods. An increase in education and outreach regarding typical fees charged and consumers' rights in the home mortgage market would help prevent North Shore residents from becoming victims of predatory lending practices.

In May of 2005, HUD published "Discrimination Against Persons with Disabilities: Barriers at Every Step." The study documented findings about housing discrimination toward persons with disabilities, in particular persons with hearing and communication disabilities and physically disabled persons in wheelchairs, using paired tests in the Chicago Metropolitan Area. The report indicated that testers with hearing and communication disabilities "experienced consistently adverse treatment relative to their hearing [counterparts] in almost half of all tests." Testers with physical disabilities were shown to have "experienced consistently adverse treatment relative to their nondisabled [counterparts] in 32.3 percent of all tests."³⁰

In February of 2006, HUD released a follow-up study called "Do We Know More Now?" One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public's awareness of housing discrimination, and its desire to report such discrimination. Unfortunately, the study found that public knowledge of most discriminatory situations had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17 percent of the study's adult participants claimed to have experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that about eight percent of the situations might be covered by the Fair Housing Act. As before, few individuals who felt they had been

²⁹ <http://www.responsiblelending.org/pdfs/2b003-mortgage2005.pdf>

³⁰ *Discrimination Against Persons with Disabilities: Barriers at Every Step*, United States Department of Housing and Urban Development, May 2005. Document available at <http://www.huduser.org/Publications>.

discriminated against filed a fair housing complaint, again indicating that they felt it “wasn’t worth it” or that it “wouldn’t have helped.”³¹

LOCAL APPLICABLE STUDIES AND ARTICLES

In 2005, The Boston Globe did a series of articles on blacks and Latinos in the Boston Metropolitan Region. A September 21 article discussed the perceptions of a Dominican woman living and working in Salem. The article talked about the Point, a predominantly Dominican and Puerto Rican neighborhood within Salem, and specifically about how these ethnic groups seem to be implicitly confined to the Point.³² On July 20, 2005, in the same series of articles, a racially mixed couple discussed their move to Andover, and how they felt surprisingly welcomed; but it also noted that the wife could not imagine being able to purchase a house without worrying about the reception they might receive from the neighbors and community.³³

In 2005, the Harvard Civil Rights Project published a report entitled “We Don’t Feel Welcome Here: African Americans and Hispanics in Metro Boston.”³⁴ The report discussed, among other things, African American and Hispanic perceptions of discrimination in housing in the greater Boston area. In general, minorities in the Boston area believe that members of their racial or ethnic minority do not move into many neighborhoods and communities over fear of their reception. They also believe discriminatory treatment by white owners and Realtors has made it difficult for minorities to get some housing, although fewer feel that they themselves have experienced this discrimination.

USA Today, in May of 2004, printed an article discussing the difficulties families with children are having with finding large enough and adequate housing, due to the fact that many communities are putting a limit on the number of bedrooms in new construction. Rowley was cited as an example of a community where developers building townhouses with no more than two bedrooms are allowed to build extra units. A Rowley official was cited as noting the benefit of preserving the town’s resources by limiting the number of children coming into the community.³⁵ The issue that arises is not so much whether these developments are in violation of fair housing, but whether local policy, such as for Rowley, are placing families with children or other protected classes at a comparative disadvantage.³⁶

The Massachusetts Community & Banking Council (MCBC) prepares an annual report on higher-cost mortgage lending in the Boston, Greater Boston, and Massachusetts areas. In its most recent report, “Borrowing Trouble VII,” released in January of 2007, the MCBC

³¹ *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

³² http://www.boston.com/news/globe/living/articles/2005/09/21/work_to_be_done/?page=3

³³ http://www.boston.com/news/globe/living/articles/2005/07/20/meet_the_neighbors/?page=4

³⁴ <http://www.civilrightsproject.ucla.edu/research/metro/pollpaper.pdf>

³⁵ http://www.usatoday.com/news/nation/2004-05-05-child-proof-housing_x.htm

³⁶ <http://www.chapa.org/pdf/AgeRestrictedHousinginMA.pdf>

analyzed Home Mortgage Disclosure Act data and has determined that subprime lenders and prospective predatory loans are disproportionately being targeted to black and Hispanic households. This agrees with research findings presented earlier in this document.

The Harvard Civil Rights Project has released another research report following along this same line of inquiry. Entitled “More than Money: the Spatial Mismatch Between Where Homeowners of Color in Metro Boston Can Afford to Live and Where They Actually Reside,” the document indicates that factors other than level of household income are at work in determining where racial and ethnic minorities choose to live. While affordability does play a role in where people choose to live, it alone does not explain the racial and ethnic concentrations seen in the marketplace.

The Fair Housing Center of Greater Boston has a number of additional resources and evaluations of fair housing in the area. The following narrative presents a succinct review of several of these available resources.³⁷

The Gap Persists: Discrimination in Mortgage Lending

During the four months from October 2005 to January 2006, the Fair Housing Center of Greater Boston (Fair Housing Center) conducted a series of investigations to determine the extent and nature of discrimination against African American, Latino, Asian, and Caribbean homebuyers seeking mortgages in Boston. The Fair Housing Center used trained volunteers to call and visit banks and mortgage companies to record their experiences. Overall, the Fair Housing Center found differences in treatment which disadvantaged the homebuyer of color in 9 of the 20 matched paired tests conducted, or 45%.

You Don't Know What You're Missing: Realtors Disadvantage African American, Latino Homebuyers

An investigation into the sales practices of major real estate companies across the region conducted by the Fair Housing Center of Greater Boston revealed that African American and Latino homebuyers experience disadvantageous treatment in half of their attempts to purchase homes in Greater Boston suburbs. The results of the 18 month audit are contained in a report entitled “You Don't Know What You're Missing.”

Between January 2004 and May 2005, the Fair Housing Center conducted two series of tests to gauge the presence of discrimination against African American and Latino homebuyers in greater Boston. The Fair Housing Center used trained volunteers to call and visit real estate offices of large chain Realtors in 14 cities and towns across the Greater Boston region. Overall, the Fair Housing Center found a pattern of differences in treatment that disadvantaged homebuyers of color in 17 of the 36 matched paired tests.

³⁷ <http://www.bostonfairhousing.org/publications.htm>.

More than Money

In 2003, Fair Housing Center Director David Harris co-authored a study with Nancy McArdle of the Harvard Civil Rights Project to test the common explanation that people of color simply cannot afford to buy homes in the suburbs. The paper, "More than Money," analyzed census data on homeownership and HMDA data on recent mortgages to determine the extent to which the region's ongoing segregation could be explained by a disparity in the values/prices of homes people of color own and those owned by whites. It was found that African American and Latino homebuyers are greatly over-represented in certain areas, even after accounting for affordability. Yet in 80 percent of cities and towns, the number of African American and Latino homebuyers was less than half what would be predicted based on affordability alone. The study found that this simple notion of "affordability" does not explain the ongoing and frequently documented patterns of racial concentration and segregation.

Access Denied: Discrimination against Latinos in the Greater Boston Rental Market

Between February and April 2002, the Fair Housing Center of Greater Boston conducted a study of housing discrimination against Latino home seekers in the area's rental market. The study relied on telephone testing of housing providers. In all, the FHCGB conducted 50 matched pair tests.

The FHCGB found evidence of discrimination against Latino home seekers in 26 of the 50 paired tests conducted, or 52%. A review of the ways in which discrimination occurred shows that most often, Latino home seekers were less likely to have access to agents and access to view units than white testers. This form of discrimination occurred in over 40% of the tests.

"We Don't Want Your Kind Living Here," A Report on Discrimination in the Greater Boston Rental Market

On April 24, 2001 The Fair Housing Center released its report on discrimination in the greater Boston rental market. The results show that families with children, African-Americans and Section 8 subsidy holders were all discriminated against in at least half of their attempts to find housing in the Greater Boston area. The report indicated that for these home seekers, the message seemed to be, "We don't want your kind living here."

This rental discrimination audit, funded by the U.S. Department of Housing and Urban Development, the Boston Foundation, and the Center's members, was the first such study conducted in Boston in more than a decade.

Discrimination in the Lowell and Merrimack Valley Real Estate Market

Between June and September 2004, the Fair Housing Center conducted a study of housing discrimination against home seekers in the greater Lowell and Merrimack Valley area rental markets. They audit tested for discrimination against African Americans, Asians, Latinos, and families with children. The study relied on telephone and in-person testing of housing providers. In all, the Fair Housing Center conducted 66 matched pair tests at 40 locations, both real estate offices and property management offices. Overall, testing showed evidence of discrimination in 31 of the 66 paired tests conducted, or 47%. The prevalence of discriminatory behavior varied widely between the groups covered.

Fight Hate: A Rapid Response Strategy

This booklet guides organizations and individuals through the process of establishing a community response network.

Preventing Hate, Promoting Respect: Diversity Appreciation Software

This interactive software takes young people on a self-guided exploration of their attitudes towards people who are different from them. (The journal-entry section is password protected, so users can be candid without worrying about their responses being judged.)

Additional local news articles addressing prospective housing discrimination in the Greater Boston area can be found at the Fair Housing Center Web site, with the link as follows:
http://www.bostonfairhousing.org/publications_list.htm.

SECTION V. EVALUATION OF THE FAIR HOUSING PROFILE

The following narratives present several perspectives about the status of the fair housing system in the North Shore HOME Consortium area, including a complaint and compliance review of the process of lodging housing complaints and fair housing complaint data arising from the complaint system. It also includes the 2007 Fair Housing Survey, a series of telephone interviews with a variety of community-based organizations and stakeholders throughout the Consortium's member communities. This survey allowed information to be collected on perceptions of both public and private policies, practices, and procedures affecting housing choice, as well as progress that may have been attained in fair housing.

COMPLAINT AND COMPLIANCE REVIEW

COMPLAINT PROCESSES FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Individuals who believe they have been discriminated against in a housing transaction have several options to file a complaint with HUD. The first step in filing a complaint with HUD is to submit a Housing Discrimination Complaint form explaining the nature of the alleged violation. Housing discrimination complaint forms, HUD-903.1, can be filed over the Internet at:

<http://www.hud.gov/offices/fheo/online-complaint.cfm>.

In addition, a form may be downloaded, printed out and completed from <http://www.hud.gov/offices/adm/hudclips/forms/files/903-1.pdf>, and mailed to the following address:

U.S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
Room 5204
451 Seventh St. S.W.
Washington, DC 20410-2000

People may also file a complaint, get a complaint form or additional information by calling the HUD Housing Discrimination Hotline at 1-800-669-9777, or by writing to the preceding address.

Complainants can also write a letter with:

- Their name and address
- The name and address of the person or persons the complaint is about
- The address of the house or apartment at which the incident occurred
- The date when this incident occurred
- A short description of what happened
- Then mail it to the HUD Fair Housing office in Boston:

Boston Regional Office of FHEO
U.S. Department of Housing and Urban Development
Thomas P. O'Neill, Jr.
Federal Building
10 Causeway Street, Room 321
Boston, Massachusetts 02222-1092

After receiving the complaint, HUD notifies the alleged violator of the complaint; that person must submit a response. HUD will investigate the complaint and determine whether reasonable cause exists to believe that the Fair Housing Act has been violated.³⁸

If the Fair Housing Act has been violated, HUD will try to reach a conciliation agreement with the respondent. If an agreement is reached, HUD will take no further action on the complaint. If HUD finds reasonable cause to believe that the discrimination occurred, and no conciliation is reached, the case will be heard in an administrative hearing within 120 days. The case may be handled by the Department of Justice (DOJ) and heard in U.S. District Court if one of the parties so desires.

In the administrative hearing, HUD lawyers will litigate the case for the complainant before an Administrative Law Judge (ALJ). If the ALJ decides that discrimination occurred, the respondent can be ordered:³⁹

- To compensate for actual damages, including humiliation, pain, and suffering
- To provide injunctive or other equitable relief; for example, to make housing available
- To pay the federal government a civil penalty to vindicate the public interest
 - The maximum penalties are \$10,000 for a first violation
 - \$27,500 for a second offense
 - \$50,000 for a third violation within seven years
- To pay reasonable attorney's fees and costs

However, in most cases, HUD will defer the housing complaint and its respective testing, investigation, and enforcement activities to the MCAD, as the State's designated substantially equivalent agency. MCAD must begin work on the complaint within 30 days or HUD may take it back.

COMPLAINT PROCESSES FOR THE MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION

By state law, Massachusetts has more protected classes than are protected by the federal government. This means that someone who is in a Massachusetts protected class that is not also federally protected must file any discrimination complaints at the local or state level,

³⁸ This is done in the absence of a substantially equivalent agency.

³⁹ <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

and not with HUD. Massachusetts landlords, lenders and Realtors are prohibited from discriminating based on race, color, religious creed, national origin, ancestry, sex, age, handicap (disability), sexual harassment, sexual orientation, marital status, children, retaliation, veteran status, or public assistance.

A charge of discrimination must be filed in person or by mail at the Massachusetts Commission Against Discrimination (MCAD) offices. If an individual believes they have been discriminated against, they should go to the MCAD immediately to file a complaint. With few exceptions, the MCAD cannot accept complaints based on incidents over 300 days old.

Complainants who choose to mail a complaint to MCAD must include the following information for their complaint to be complete:

- A simple narrative of what occurred
- Identify similarly situated individuals who were treated differently
- Be specific as to dates and events
- Include any documentation that is believed to support the complaint

The complaint must be signed and dated to be considered complete.

A person who comes to the MCAD and feels that he/she has been aggrieved will be asked to fill out an interview form. This form provides the Commission with important information about what happened. If the complainant wishes to complete the interview form beforehand and bring it with them, the form can be accessed at: <http://www.mass.gov/mcad/documents/Intake-Interview-Form.pdf>.

Once an initial determination has been made that the MCAD has jurisdiction over a particular case, the complainant will meet with an investigator to convey the situation. The investigator uses the facts gathered from this discussion to draft a formal, written complaint. A copy of the complaint is sent to the person or organization against whom the complaint has been filed.

After the MCAD obtains a statement from the respondent outlining their position regarding the complaint, a meeting is usually held at the MCAD that brings together the complainant and the respondent. The purpose of the meeting is to gather information surrounding the complaint and to discuss the possibility of a voluntary resolution of the complaint. If a resolution is not reached, the investigator will continue to gather information by interviewing witnesses, obtaining documents, making visits to the place of residence or other appropriate on-site visits.

At the conclusion of an investigation, the Investigating Commissioner will make a formal determination of either Probable Cause that discrimination occurred or Lack of Probable Cause. If Probable Cause is found, efforts at resolution between the complainant and the respondent are attempted. If the parties are unable to resolve the dispute, the case goes to Public Hearing.

A Public Hearing is a formal proceeding at which witnesses testify under oath before one of three MCAD Commissioners. The Commissioner serves as the judge and reviews testimony and documents submitted at the Hearing. Complainants and respondents can hire an attorney to represent them at the Hearing. When the complainant does not have an attorney, a MCAD lawyer will prosecute a case on behalf of the Commission. The Commissioner reviews legal briefs submitted at the end of the Public Hearing and issues a decision either in favor of the complainant or the respondent.

If the MCAD finds in favor of the respondent, the case is dismissed. If the decision is in favor of the complainant, the MCAD may order any one of a number of remedies, such as monetary damages reflecting housing expenses incurred and emotional distress damages. The MCAD also has the authority to assess reasonable attorney fees and costs.

If the MCAD does not find sufficient evidence to support a conclusion that unlawful discrimination occurred, a Lack of Probable Cause (LOPC), the complainant has a right to appeal within 10 days of receiving the decision. The Investigating Commissioner holds an informal hearing and the complainant has an opportunity to explain why he/she believes the determination was wrong.

The Commissioner may uphold the determination, send the case back for further investigation, or reverse the finding (make a PC determination). If the determination of LOPC is sustained, the case is closed and goes no further at the MCAD.⁴⁰

NORTH SHORE FAIR HOUSING ORGANIZATIONS

The Fair Housing Center of Greater Boston (FHC) is the one regional agency for the North Shore HOME Consortium area. The FHC advocates for people who have experienced discrimination, through the HUD, MCAD or court systems, to bring about positive resolution. The Fair Housing Center may be the best first stop for a person who feels they have experienced housing discrimination, due to their local knowledge and focus.

A person who feels they have been aggrieved can begin the complaint process with the Fair Housing Center by writing the details of the incident down. Complainants should create a timeline of what happened when they tried to rent or buy a place to live. They should be sure to include the who, what, where, when, why and how, such as the date and time it happened, the name, address and phone numbers of all the people involved; the original (or a copy) of any ads seen for the house or apartment, and any other paperwork given to them. A complainant should fill out an intake form, which may be downloaded from: http://www.bostonfairhousing.org/intake_form.htm. The complainant should mail this intake form and the timeline to the Fair Housing Center at the following address:

The Fair Housing Center of Greater Boston
59 Temple Place #1105
Boston, MA 02111

⁴⁰<http://www.mass.gov/mcad/documents/Practical%20Guide%20to%20the%20Complaint%20Process%20at%20the%20MCAD.pdf>

The complainants should be sure to include their name and a number where they can be reached during business hours so that the enforcement coordinator can contact them if he or she needs more information.

The Center may contact the person or organization the complaint is registered against to get more information.

If the enforcement coordinator finds evidence of discrimination, she or he will suggest options for resolving the matter, including:

- filing a law suit in state or federal court;
- filing a complaint with the U.S. Department of Housing and Urban Development (HUD), the MA Commission Against Discrimination (MCAD), or other local agencies; or
- Going through an arbitration process (working out an agreement) with the owner, manager, or agent.

The Center will work to resolve the matter by working with the complainant directly or by forwarding the case to a lawyer, HUD or MCAD. The Center will not take action on the complainant's behalf without his or her consent. It is important for the complaint process to begin promptly because some rights are not protected if not acted upon within 6 months.

HOUSING COMPLAINTS FILED WITH HUD

HUD maintains records of all complaints filed with the agency, or filed with the substantially equivalent agency, the MCAD, that represent violations of federal housing law. A request was submitted to HUD for fair housing complaint data over the 2001 through 2006 time period. Over this period, HUD reported 82 complaints occurring in the 30 Consortium member communities. Table V.1, below, presents these complaints and illustrates the basis for each complaint. Basis refers to the class protected under federal law. A single complaint may have more than one basis; hence the number of bases may be higher than the number of complaints.

TABLE V.1
FAIR HOUSING COMPLAINTS FILED WITH HUD
BASIS OF COMPLAINT: 2001-2006

Year	Race	Color	Disability	Gender	National Origin	Familial Status	Religion	Harassment & Retaliation	Total Basis	Total Complaints
2001	4	6	6	.	4	6	.	.	26	12
2002	2	.	8	1	.	6	.	1	18	9
2003	2	1	6	.	.	4	2	.	15	11
2004	1	1	6	.	2	4	.	.	14	11
2005	3	.	12	.	4	9	.	1	29	17
2006	3	1	13	3	4	5	.	5	34	22
Total	15	9	51	4	14	34	2	7	136	82

Over the six-year period, disability, familial status and race were the three most frequent bases cited for the housing complaints filed under federal fair housing law, with 51, 34, and 15 bases, respectively. Complaints alleging a basis of gender or religion were filed least often, having just 4 and 2, respectively.

However, of these 82 complaints over the six-year period, slightly over sixty-two percent were determined to be without cause, as noted in Table V.2. This means that after investigation, it was determined that no violation of federal fair housing law occurred. This is actually a fairly high percent share of dismissals. Another 20 incidents were either “complaint withdrawn by complainant after resolution” or they reached “conciliation/settlement agreement,” and 3 were missing closure codes, implying the cases were still open.

TABLE V.2
FAIR HOUSING COMPLAINTS FILED WITH HUD
DISPOSITION OF THE COMPLAINT: 2001 - 2006

Outcome of the Complaint	2001	2002	2003	2004	2005	2006	Total
No cause determination	7	5	6	7	13	13	51
Complaint withdrawn by complainant after resolution	3	3	1	3	1	6	17
Complaint withdrawn by complainant without resolution	.	1	1	1	1	.	4
Conciliation/settlement successful	1	.	2	.	.	.	3
Complainant failed to cooperate	1	.	1	.	.	.	2
FHAP judicial consent order	1	.	1
FHAP judicial dismissal	1	1
Missing closure code	1	2	3
Total	12	9	11	11	17	22	82

There are a number of issues seen in the marketplace pursuant to these complaints. These issues relate to the perceived violation of fair housing law. In general, the issues that occur most frequently are those that occur in the rental market, with the three most frequent issues relating to discriminatory terms and conditions in rental, discriminatory refusal to rent, and failure to make reasonable accommodation. Hence, discrimination complaints related to rentals in the North Shore are more frequent than discrimination complaints related to a sale, as seen in Table V.3, below.

TABLE V.3
FAIR HOUSING COMPLAINTS FILED WITH HUD
ISSUES OF THE COMPLAINT: 2001-2006

Issue	2001	2002	2003	2004	2005	2006	Total
Discrimination in terms/conditions/privileges relating to rental	2	7	1	3	2	10	25
Discriminatory refusal to rent	4	3	3	3	8	2	23
Failure to make reasonable accommodation	2	2	2	2	8	6	22
Discriminatory terms, conditions, privileges, or services and facilities	3	.	3	2	5	1	14
Discriminatory refusal to rent and negotiate for rental	1	1	1	.	.	3	6
Discriminatory acts under Section 818 (coercion, etc.)	1	1	1	.	.	1	4
Discriminatory advertising, statements and notices	.	.	1	.	.	1	2
False denial or representation of availability	1	1	2
Otherwise deny or make housing available	2	2
Discriminatory acts under Section 901 (criminal)	1	1	2
Discriminatory refusal to sell and negotiate for sale	.	.	.	1	.	.	1
Discriminatory refusal to negotiate for rental	.	.	.	1	.	.	1
Discriminatory advertisement - rental	.	.	.	1	.	.	1
Discrimination in terms/conditions/privileges relating to sale	1	1
Adverse action against an employee	1	1
Refusing to provide municipal services or property	1	1
Failure to provide accessible and usable public and common user areas	1	1
Discriminatory refusal to sell	.	.	.	1	.	.	1
Other discriminatory acts	1	.	1
Using ordinances to discriminate in zoning and land use	1	1
Total	16	15	12	14	25	30	112

MASSACHUSETTS STATE AND FEDERAL HOUSING LAW COMPLAINT DATA

The Massachusetts Commission Against Discrimination (MCAD), as the substantially equivalent agency, received federal housing complaints that are filed dually with both HUD and the MCAD. Furthermore, violations of Massachusetts fair housing law are addressed solely by the MCAD. Consequently, it was presumed that the MCAD would have a more complete data set, comprising both federal and state fair housing complaints. MCAD was also contacted and a similar request was made for housing complaint data over the same period of time.⁴¹

Table V.4 presents the results of the tabulation of this data concerning prospective violations of either state or federal fair housing law. Over the same period of time, with the inclusion of both federal and state fair housing complaints, the level of complaint activity appears low, with just 54 complaints over the six-year period, even lower than the HUD data.⁴² This appears contrary to reason, as more complaints would be expected as protected classes essentially doubled. Overall, this level of complaint activity and paucity of records is perplexing. Interestingly, the MCAD shows fewer complaints over time, while HUD indicated that there were more. Nevertheless, common themes emerge. Disability, familial status, and race/color appear as the most frequent fair housing bases contained within the MCAD database, just as seen with HUD complaints.

TABLE V.4
MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION
NORTH SHORE REGION HOUSING COMPLAINTS
BASIS OF COMPLAINT: 2001-2006

Year	Race, Color	Disability	Gender	National Origin	Familial Status	Religion	Age	Sexual Orientation	Lead Paint	Public Assistance	Total Basis	Complaints
2001	5	7	2	2	6	1	2	2	.	.	27	21
2002	3	5	1	.	3	.	1	.	1	1	15	11
2003	.	3	.	1	1	2	7	5
2004	3	2	.	1	.	.	.	1	1	.	8	7
2005	1	5	6	6
2006	1	.	.	2	1	.	.	1	.	.	5	4
Total	13	22	3	6	11	1	3	4	2	3	68	54

The dispositions of the complaints filed with the MCAD are also similar to that seen with the HUD complaints, even though there are far fewer complaints. Fifty-seven percent were found to have no cause, some settlements occurred, and two others were open, as noted in Table V.5, on the following page.

⁴¹ MCAD were uncooperative with the public records request and the Secretary of State had to be notified. Upon request of the Secretary of State's office, the request was fulfilled at a charge of \$250. This process took more than six weeks.

⁴² For geographic areas having substantially equivalent agencies, dually filed housing complaint data is never the same between HUD and the substantially equivalent agency.

TABLE V.5
MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION
NORTH SHORE REGION HOUSING COMPLAINTS
DISPOSITION OF THE COMPLAINT: 2001 - 2006

Outcome of the Complaint	2001	2002	2003	2004	2005	2006	Total
Closed - Lack of Probable Cause	10	6	5	3	4	3	31
Closed - Withdrawn With Settlement	3	2	.	3	1	.	9
Closed - Administrative	2	2	4
Closed - Dismissed	3	3
Active	1	1	2
Closed - Investigation Not Authorized	1	.	.	1	.	.	2
Closed - Conciliated	1	1
Closed - Unable to Locate Complainant	1	1
Closed - Withdrawn	.	1	1
Total	21	11	5	7	6	4	54

Furthermore, while the discriminatory issues recorded by the MCAD are slightly different than the system reported by HUD, refusal to rent, denial of reasonable accommodation and terms and conditions are again some of the most frequent actions seen in the marketplace, as evidenced in Table V.6, below.

TABLE V.6
MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION
NORTH SHORE REGION HOUSING COMPLAINTS
ISSUES OF THE COMPLAINT: 2001-2006⁴³

Issue	2001	2002	2003	2004	2005	2006	Total
Refusal to rent or sublet	9	3	1	3	2	1	19
Denied Reasonable Accommodation	4	3	1	1	4	.	13
Terms & conditions	13	2	2	2	1	1	21
Eviction or Threatened Eviction	2	3	4	1	2	.	12
Other terms, conditions, or privileges	2	5	1	2	1	2	13
Sexual Harassment	1	1	.	.	.	1	3
Other	.	.	1	1	.	1	3
Other Terms & Conditions	1	1
Unlawful inquiry (oral or written)	1	1
Total	33	17	10	10	10	6	86

HOUSING COMPLAINT DATA PROVIDED BY THE FAIR HOUSING CENTER OF GREATER BOSTON

The Fair Housing Center of Greater Boston (FHC), while relatively new to serving the North Shore HOME Consortium area, has received and processed a number of complaints over the last five years. Some 35 complaints were processed by the FHC. As seen in both the HUD and MCAD data, most were attributable to the rental market, with just two associated with a sales activity. Similarly, the bases of the complaints were predominantly familial status, disability, and race or national origin.

⁴³ Data received from MCAD appeared with multiple numeric issue codes for issues with identical labels; these issues, though under separate numeric codes, are presumed to be the same, and have been consolidated.

SUITS FILED BY THE DEPARTMENT OF JUSTICE

Under the Fair Housing Act, the Department of Justice (DOJ) may bring lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination, or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights, the DOJ may institute criminal proceedings; and
- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD, or file their own lawsuit in federal or state court. The DOJ brings suits on behalf of individuals based on referrals from HUD.

If a complainant chooses to resolve a complaint in federal court rather than through an Administrative Law Judge with HUD or the MCAD, the U.S. Department of Justice (DOJ) files the case. DOJ records do not list any cases in the North Shore within the last five or six years.

RECENT NORTH SHORE FAIR HOUSING CASES

In 2005, the Massachusetts Supreme Judicial Court decided *Andover Housing Authority v. Shkolnik*, 443 Mass. 300 (Jan 14, 2005). The Andover Housing Authority (AHA) served an eviction notice due to noise complaints from a downstairs neighbor to an elderly woman with health problems, including Alzheimer’s disease related issues. She and her husband submitted a counterclaim arguing the AHA failed to provide reasonable accommodation by temporarily postponing the eviction proceedings. The court held that the failure to postpone the eviction was not an example of failure to accommodate, at least in part because the woman denied the noise problem at various stages of the administrative process and did not acknowledge the role the disability may have played in the lease violation. Importantly, the court advocated the use of an interactive process or dialogue between a landlord and a tenant as an ideal way to address the feasibility and availability of accommodating the tenant’s handicap.⁴⁴

RELATED MASSACHUSETTS FAIR HOUSING CASES

The Housing Act of 1998 has made several changes to the way in which public housing authorities (PHAs) may establish and maintain waiting lists for the certificate and voucher programs. Recently, in Massachusetts, eight smaller suburban public housing authorities jointly conceived and adopted new policies that drop the federal need-based preferences and replace them with a local residency preference. Specifically, the eight authorities decided that they would open up their certificate and voucher waiting lists, that they would conduct a lottery on December 1, 1998 to select who would go on the waiting lists from

⁴⁴ http://www.lawyersweeklyusa.com/reprints/sally_fitch.htm

among all the applicants, and, among those selected by the lottery, that they would give preference to residents from the town in which each of the authorities operated.

In an action filed in federal court shortly after these eight authorities adopted their new policies, four low-income minority women who reside outside their areas of operation challenged the authorities' actions on the grounds that they violate the 75-percent rule and/or the Fair Housing Act.

The applicants sought and obtained a temporary restraining order to preclude the authorities from applying the local preferences to the waiting lists as established by the lottery and from distributing any available certificates or vouchers pending further court action. The court also ordered the parties, particularly the PHAs, to compile factual data relating to the racial and income mix of the authorities' existing and new waiting lists as well as a breakdown between residents and nonresidents on those lists. In addition, the court asked the PHAs to predict the number of certificates each would have available for the following fiscal year, and asked all the parties to submit briefs addressing the impact that the new local preference policies would have in light of the 75-percent rule and the Fair Housing Act's requirements.

Upon review of the data and briefs, the court issued a preliminary injunction enjoining two of the housing authorities from applying local preferences to the waiting lists established as of December 1, because their application would result in their violating the 75-percent rule. It enjoined three other authorities from applying the local preferences to the newly created waiting lists because their application would violate the Fair Housing Act. With respect to the remaining three authorities, the court concluded that it was not likely that their current waiting lists — the establishment of which had not been challenged by the plaintiffs — would be exhausted prior to the end of 1999 and therefore it was premature to enjoin their actions. Nonetheless, it required that they report to the court upon exhaustion of their preexisting waiting lists and prior to distribution of any certificates to persons on their December 1, 1998 lists.⁴⁵

THE 2007 FAIR HOUSING SURVEY

Additional evaluation of the North Shore HOME Consortium's fair housing profile was conducted by use of a scientific survey of housing experts throughout the area. The purpose of conducting the 2007 Fair Housing Survey, a relatively more qualitative component to the analysis of impediments, was to gather the knowledge, opinions, and feelings stakeholders had regarding fair housing in the member communities as well as to gauge the ability of housing stakeholders in the area to understand and affirmatively further fair housing.

⁴⁵ *Langlois v. Abington Housing Authority*, No. 98-12336-NG (D. Mass. Dec. 30, 1998).

The North Shore HOME Consortium developed a list of prospective participants for the 2007 Fair Housing Survey. Additional prospective contacts were added to this survey list, and after final review of that list, close to 250 individuals throughout the member communities were solicited. Nearly 115 respondents completed the telephone interviews. Respondents were drawn from a broad array of occupations and lines of work, including in-need service providers, advocates, program managers, developers, architects and builders, planners, development specialists, non-profit agencies, property managers, and Realtors, as presented in Table V.7, at right.

TABLE V.7
WHAT ROLE DO YOU PLAY IN THE HOUSING INDUSTRY?
2007 FAIR HOUSING SURVEY

Category	Completed
In-need service provider	26
Housing program manager	13
Property manager	13
Realtor or Broker	13
Housing Authority Representative	10
Banker/Lender	9
Builder/Developer	7
Planning	6
Social Service Entity	5
Advocates	5
Other housing providers	4

The initial lines of inquiry in the survey related to assessing the individuals' general perceptions of fair housing law, its usefulness, ease of use, and whether respondents had come into contact with fair housing law training in their lines of work. The responses to these questions are presented in Table V.8, below.

TABLE V.8
UNDERSTANDING OF FAIR HOUSING LAW
2007 FAIR HOUSING SURVEY

Question	Yes	No	Don't Know	Total
Do they serve a useful purpose?	107	1	6	114
Are they difficult to work with, understand or follow?	26	71	15	112
Is there a specific training process to learn about fair housing laws?	65	48	0	113

In regard to whether fair housing laws served a useful purpose, the vast majority of people, some 107 persons, believe that these laws do indeed serve a useful purpose, although one said no and another six were unsure or didn't know how to respond to the question.

Respondents also expressed an opinion on fair housing laws and whether they have difficulty understanding or following these laws. Some 71 respondents indicated that fair housing laws were not difficult to understand or follow. However, about 23 percent of the respondents stated that they lacked a good understanding of the fair housing laws. Another 13 percent simply didn't know. This is of concern, as some 36 percent of the member community's housing experts seem to have some reluctance to express a good understanding of fair housing and fair housing law. Consequently, affirmatively furthering fair housing might be more difficult to attain, given this lack of understanding.

Respondents also revealed whether or not there was a fair housing training process offered through their work or professional affiliation. Forty-two percent, or some 48 of the respondents, indicated that no specific training process was available to them. It appears that the lack of access to a formal fair housing educational process may also impair the ability to affirmatively further fair housing within the stakeholder community.

Respondents were also asked to express their knowledge of those groups considered to be protected classes under the fair housing laws. One or more answers could be offered, with the seven federally protected classes of race, color, religion, sex, disability, national origin, and familial status, and the additional state protected classes of marital status, sexual orientation, source of income, medical condition, and age the correct classes. If all respondents had indicated correctly all protected classes, more than 1,300 answers would have been received. Unfortunately, the stakeholders do not appear to have a good feel for what is described as a protected class.

When enumerating their idea of the protected classes, 22 of the respondents indicated “minorities,” 15 indicated race, and 15 said “all” or “everyone.” Ten more indicated that low income persons were a protected class, even though this is not the case. However, the “Other” category was comprised of many answers that were somewhat off-base, including “high income,” “the rich and famous,” “the needy,” “renters,” and similar responses, as seen in Table V.9.

These citations were sometimes quite far from the concept of a protected class. These data further highlight the need for additional fair housing knowledge in the member communities. It is difficult to understand fair housing law without also understanding who is protected under the law.

Another of the questions in the interviews asked each respondent what they might say

if a housing consumer came to them and expressed the notion that they had been a victim of an unfair housing practice. The responses to this question are telling, as noted in Table V.10, below. It is of particular concern, as a fairly large number of respondents would attempt to determine for themselves whether a fair housing violation actually occurred.

TABLE V.9
WHO IS PROTECTED BY FAIR HOUSING LAW?
2007 FAIR HOUSING SURVEY

Category	Responses
Minorities	22
Race	16
Everybody/All persons	15
Low Income	10
Disabled	8
Elderly	7
Familial Status	5
Color	4
Sexual Orientation	3
Other	25

TABLE V.10
WHERE WOULD YOU REFER
A VICTIM OF FAIR HOUSING DISCRIMINATION?
2007 FAIR HOUSING SURVEY

Agency/Organization	Responses
Would try to judge first	14
Don't know	7
HUD	5
Attorney General	4
MCAD	4
Neighborhood Legal Services	4
Fair Housing Center of Greater Boston	4
Legal aid services	4
DHCD	3
An attorney	2
Other entities cited	64

Only a few people selected an appropriate route, which would be Fair Housing Center of Greater Boston, HUD, or the MCAD. Many simply expressed that they had no idea where to turn. Some, however, did indicate HUD or the MCAD. This set of responses indicates that the current referral system may not be working as well as desired, and implies that there may be a constraint on access to the fair housing complaint system.

The next sequence of survey questions pertained to concerns or reservations about fair housing in the North Shore HOME Consortium service area, if respondents could cite specific instances for these concerns, and whether they saw barriers or constraints to affirmatively furthering fair housing, including city, county, or state policies that adversely affect affirmatively furthering fair housing. If so indicated, respondents were asked to explore the concerns, citations, barriers, and related issues in greater detail. First, in general, almost 40 percent of the respondents expressed concerns with fair housing, as noted in Table V.11, below. Almost 44 percent of the respondents indicated that they perceive that there are indeed barriers to fair housing. However, few were willing or able to cite specific instances that adversely affect fair housing.

TABLE V.11
CONCERNS, BARRIERS, OR CONSTRAINTS AFFECTING FAIR HOUSING
2007 FAIR HOUSING SURVEY

Question	Yes	No	Don't Know	Total
Do you have concerns or reservations about fair housing?	45	65	3	113
Are there barriers or constraints to affirmatively further fair housing?	49	62	1	112
Specific instances involving unfair housing or housing discrimination?	14	98	0	112

It is, however, important to inspect the underlying reasons for these concerns and issues more closely, and the implications of these perceptions and feelings expressed by the area's stakeholders and housing experts.

For the 45 persons who expressed concerns, little consistency was expressed. Even though 13 people cited concerns with prospective discriminatory actions, the next most cited concern, with 9 persons so indicating, pertained simply to the high cost of housing. Availability was also cited several times, as seen in Table V.12, at right. Overall, concerns or reservations about fair housing were slightly off from the notion or spirit of affirmatively furthering fair housing.

TABLE V.12
FAIR HOUSING CONCERNS OR RESERVATIONS
2007 FAIR HOUSING SURVEY

Expressed Concerns	Responses
Discriminatory actions	13
Housing costs too high	9
Fair housing laws not working	6
Lack of affordable housing	6
Landlord/tenant disputes	3
Restrictive regulations	1
Lack of coordination between communities	1
All other	6
Total	45

For the 49 persons indicating that they believed there were barriers or constraints to fair housing, the most frequently cited answer again pertained to affordability, with availability a close third. Several did note that the fair housing system is not working well. In addition, there were many unique answers, several of which did not directly address affirmatively furthering fair housing. These responses are noted in Table V.13, at right. Taken together, Tables V.12 and V.13 indicate that the understanding of affirmatively furthering fair housing and the operation and use of the fair housing system are not well understood concepts or topics.

TABLE V.13
FAIR HOUSING BARRIERS OR CONSTRAINTS
2007 FAIR HOUSING SURVEY

Expressed Barriers	Responses
Affordability	17
Fair housing system doesn't work	8
Availability	6
Discrimination	1
Home Rule	1
Ignorance	1
Lack of public knowledge	1
Lack of will	1
No administrative capacity	1
All other	12
Total	49

Adequate planning for the provision of available and affordable housing is certainly a valid concern, especially in terms of whether the marketplace is operating equitably. However, while it may appear “unfair” that insufficient quantities of such housing are available, clearly distinguishing between affirmatively furthering fair housing and the provision of affordable and available housing needs to be instilled in the community.

Another question in the 2007 Fair Housing Survey directly addressed the respondents’ perception of the adequacy of the current level of outreach and education. The question was posed with simple response options: too much, just right, too little, or don’t know. It is important to note that several of the respondents indicated that they were completely unaware of any outreach and education at this time and were therefore unable to gauge whether current levels were too much or too little. This was true even though half of the respondents had previously indicated that such training was available to them through their work or professional affiliation. Still, no one expressed the notion that there was too much and 54 said too little, as noted in Table V.14. Since so many did not know of any education or outreach activities, this indicates that there is likely to be insufficient training opportunities and also indicates local support for additional outreach and educational services.

TABLE V.14
NEED FOR EDUCATION AND OUTREACH
2007 FAIR HOUSING SURVEY

Degree of Need	Responses
Too Much	0
Just Right	32
Too Little	54
Don't Know/no answer	27
Total	113

Respondents were also asked about whether they were aware of any enforcement activities, particularly as it relates to fair housing testing. First, three types of testing were defined for the respondent, as follows:

Complaint-based testing: After receipt of a housing complaint, the entity processing the housing complaint conducts a test to evaluate the validity of the alleged fair housing violation. One or more testers will call on the housing provider and inquire as to the availability of the housing. The actions of the housing provider are recorded and compared among testers to assess

consistent or inconsistent behavior. This particular practice is seen as a valid way to determine cause and can further substantiate administrative or legal proceedings, if required.

Random Testing: Random testing usually occurs without a complaint being brought forward first. Similar to complaint-based testing, one or more testers will call on a selected housing provider and inquire as to the availability of the housing. The actions of the housing provider are recorded and compared among testers to assess consistent or inconsistent behavior.

Audit Testing has been implemented in two separate fashions. For enforcement, it represents on-site evaluation of new construction to verify that the unit is in compliance with ADA and fair housing accessibility guidelines. This enhances long-term accessibility, knowledge of proper building requirements, as well as limiting future liability. On the other hand, this type of testing can also be useful when designing efficient outreach and education activities, thereby better understanding how to approach educating both builders and providers within a particular housing sub-market. It may also be undertaken to evaluate property managers across multiple facilities, evaluating a particular type of discriminatory action. Testing in this manner can provide an opportunity to enhance fair housing education, or bring to light prospective actions that may have become embedded in a particular segment of a housing market.

The goal of this question was to evaluate which type of testing was best understood and which might be preferred by the respondents. Unfortunately, more than 90 percent of the respondents indicated that they were unaware of any testing activities at all, as noted in Table V.15, at right. Since such a large number of the stakeholders that were surveyed were unaware of testing, determining which type of testing was preferred was not pursued. Overall, the community seems to lack an understanding of the roles of education and outreach, as well as testing and enforcement, in the operation of an efficient fair housing system.

TABLE V.15
AWARE OF TESTING AND ENFORCEMENT
2007 FAIR HOUSING SURVEY

Aware of Testing?	Responses
Yes	8
No	102
Don't Know/no answer	3
Total	113

Another line of inquiry in the 2007 Fair Housing Survey addressed whether the interviewed stakeholder was aware of any fair housing plan in the Consortium service area. Just 21 indicated that they were aware of any fair housing planning process in the area. Clearly, this underscores the need to conduct additional outreach and education associated with HUD's required Consolidated Plan, and the degree to which it addresses affirmatively furthering fair housing.

The concluding question of the survey asked if there was a need to further enhance the area's fair housing laws. While 22 said yes, another 49 said no and some 35 were unsure. However, those that discussed the matter in more detail indicated that the laws and the system as a whole needed to work more effectively.

THE 2007 FAIR HOUSING FORUMS

The North Shore HOME Consortium hosted four Fair Housing Forums during the week of September 10, 2007 in the cities of Gloucester, Haverhill, Newburyport, and Peabody. At

each of these public meetings, selected preliminary findings of the Analysis of Impediments were presented, the Fair Housing Center of Greater Boston offered an overview of their role and mandate in the region, and a period of time was provided for attendees to offer perspective and commentary about fair housing in the HOME Consortium service area.

Most of the findings of the aforementioned Fair Housing Surveys were iterated, particularly as it relates to the lack of outreach and education for stakeholders, as well as housing consumers and providers throughout the area. Still, one particular theme was raised at several of the Forums that deserves a substantive response. It is the perception by stakeholders that several units of local government in the HOME Consortium service area implement land use zoning policies to restrict family housing.

The Fair Housing Center of Greater Boston (FHCGB) has offered the following interpretation of such actions.⁴⁶

There is reason to believe that zoning done to prevent the building of 3-4 bedroom units with the purpose of keeping out families with children may be interpreted to be illegal under the Fair Housing Act since it discriminates against a protected class - families with children.

The FHCGB also notes that the courts have ruled in multiple cases against “fiscal zoning,” or making zoning decisions so as to minimize the fiscal impact of population growth on a community. The following examples present selected recent case history in other states:

Southern Burlington County NAACP v. Mt. Laurel Township, 67 N.J. 151, 336 A.2d 713 (NJ 1975). Mt. Laurel Township had limited housing development to single family homes on minimum lot sizes of 20,000 square feet. The Court noted:

“There cannot be the slightest doubt that the reason for this course of conduct has been to keep down local taxes on property (Mount Laurel is not a high tax municipality) and that the policy was carried out without regard for non-fiscal considerations with respect to people, either within or without its boundaries. This conclusion is demonstrated not only by what was done and what happened, as we have related, but also by innumerable direct statements of municipal officials at public meetings over the years which are found in the exhibits. The trial court referred to a number of them. No official testified to the contrary.

Mount Laurel has allowed some multi-family housing by agreement in planned unit developments, but only for the relatively affluent and of no benefit to low and moderate income families. And even here, the contractual agreements between municipality and developer sharply limit the number of apartments having more than one bedroom. While the township’s PUD ordinance has been repealed, we mention the subject of bedroom restriction because, assuming the overall validity of the PUD technique, the measure could be reenacted and the subject is of importance generally. The design of such limitations is obviously to restrict the number of families in the municipality having school age children and thereby keep down local education costs. Such restrictions are so clearly contrary to the general welfare as not to require further discussion.

⁴⁶ Ms. Aviva Rothman-Shore, email correspondence, September 26, 2007.

The township's principal reason in support of its zoning plan and ordinance housing provisions, advanced especially strongly at oral argument, is the fiscal one previously adverted to, *i.e.*, that by reason of New Jersey's tax structure which substantially finances municipal governmental and educational costs from taxes on local real property, every municipality may, by the exercise of the zoning power, allow only such uses and to such extent as will be beneficial to the local tax rate. In other words, the position is that any municipality may zone extensively to seek and encourage the 'good' tax rates of industry and commerce and limit the permissible types of housing to those having the fewest school children or to those providing sufficient value to attain or approach paying their own way tax-wise."

United States of America v. City of Black Jack, Missouri, 508 F.2d 1179 (8th Cir. 1974). The Eighth Circuit in *Black Jack* held that the Fair Housing statute prohibited fiscal zoning. In *Black Jack*, the United States argued that the City had denied persons housing on the basis of race, in violation of §3604(a), and had interfered with the exercise of the right to equal housing opportunity, in violation of §3617, by adopting a zoning ordinance which prohibited the construction of any new multiple-family dwellings. The court ultimately held that the city had denied persons housing on the basis of race, in violation of §3604(a), and had interfered with the exercise of the right to equal housing opportunity, in violation of §3617, by adopting a zoning ordinance which prohibited the construction of any new multiple-family dwellings. The court held that the remedy for this violation of the Fair Housing Act is provided in §3615: "... any law of a State, a political subdivision, or other such jurisdiction that purports to require or permit any action that would be a discriminatory housing practice under this subchapter shall to that extent be invalid." *Id.*, at 1187.

Oakwood at Madison v. Township of Oakwood, 117 N.J.Super. 11, 283 A.2d 353 (New Jersey 1971). In *Oakwood*, the local government decided it wanted to curb population growth significantly in order to stabilize the tax rate. In seeking to do this, the Township adopted a zoning bylaw that restricted multifamily buildings to about 500 to 700 additional units, none of which could have three bedrooms or more. Under the zoning bylaw, two bedroom units were limited to 20% of the total units in any apartment development. The New Jersey court invalidated the zoning bylaw. According to the Court, "Fiscal zoning *per se* is irrelevant to the statutory purposes of zoning. " 283 A.2d at 357.

The case of *Molino v. Mayor and Council of the Borough of Glassboro*, 116 N.J.Super. 195, 281 A.2d 401 (NJ 1971) presents a good example of how a community may seek to childproof the community absent an outright prohibition. In *Molino*, a contractor challenged the enactment of a zoning bylaw that affected his right to construct apartment units. The contractor originally proposed a 252-unit development. At first, however, he could obtain financing for only 80 units. After constructing those units, the contractor sought approval for the construction of the remaining 172 units. Rather than grant such approval, however, the town enacted a zoning bylaw which provided in relevant part that in any given garden apartment complex, at least 70 percent of all units could have no more than one bedroom. Moreover, under the bylaw, no more than 25 percent could have two bedrooms, and no more than five percent could have three bedrooms. In addition, the ordinance contained provisions increasing the minimum yard and frontage requirements, requiring certain kinds of landscaping, increasing the fireproofing requirements, and requiring a planting screen as a buffer. Two weeks after the Borough Council enacted the ordinance, the Planning Board rejected the site plan because of non-compliance with the new ordinance.

In striking down the Glassboro actions, the court focused on the impact that the zoning ordinance had on families with children. The court said: "The defendants during the trial admitted on several occasions that this ordinance was designed to keep children out of Glassboro, because more children require more schools and as a result higher taxes. If the issue is narrowed to the resolution of the legality of such action by a governing body, the immediate reaction is not favorable. The provisions of the ordinance must be analyzed. No less than 70 percent of all apartments shall be one bedroom units. We know this denies occupancy by families with children. And no more than 5 percent shall be three bedroom units. This is a minimal provision. No more than 20 percent may have two bedrooms, which by design limits the family size." The court then disapproved the ordinance. Succinctly, the court's position stated: "there is ... a right to live as a family, and not be subject to a limitation on the number of members of that family in order to reside any place. Such legal barriers would offend the equal protection mandates of the Constitution."

SUMMARY

Housing complaint data received from HUD, the MCAD, as well as the Fair Housing Center of Greater Boston indicate that there appears to be housing discrimination in the North Shore HOME Consortium service area. The discriminatory actions most frequently occur in the rental market and are associated with different terms and conditions and refusal to make reasonable accommodation. The protected classes most frequently cited in the complaint data are disability, familial status, and race.

Furthermore, there tends to be a lack of understanding of fair housing law, who is protected under the law, and what to do in the event of an alleged fair housing violation. The stakeholder community, as well as both providers and consumers of housing, do not understand where to turn for fair housing services nor where to go to lodge a fair housing complaint. Fair housing dialogue is often confused with affordable housing and landlord/tenant issues. At the same time, many of the respondents to the 2007 Fair Housing Survey acknowledged that additional outreach and education is necessary.

Lastly, the Fair Housing Forums illuminated one additional fair housing concern, the prospective legal risks associated with prospective zoning policies that may be designed to restrict housing suitable for families.

SECTION VI. IMPEDIMENTS AND SUGGESTED ACTIONS

OVERVIEW OF FINDINGS

The North Shore HOME Consortium service area tends to have a very low percentage of minority racial and ethnic populations. However, the spatial distribution of this population indicates areas of very high concentration of such populations. The same is true for both the disabled and lower income households. The HOME Consortium area does not have substantive housing condition problems. Still, the increasing costs of housing are drastically outpacing any rises in household income.

Racial and ethnic minorities, especially blacks and Hispanics, face much higher rates of mortgage application denials for homeownership than do whites. This is true even after comparing income across racial and ethnic groups. Still, the reason most frequently offered regarding denials relates to lack of sufficient quality in credit, even though the denial reasons appear to be missing in greater frequency for selected minorities. Furthermore, the subprime lending market has expanded quickly over the last few years and tends to market more often to racial and ethnic minority householders.

Housing complaint data received from HUD, the MCAD, and the Fair Housing Center of Greater Boston indicate that there appears to be housing discrimination in the North Shore HOME Consortium service area. The types of discriminatory actions most frequently occur in the rental market and are associated with different terms and conditions and refusal to make reasonable accommodation. The protected classes most frequently cited in the complaint data are disability, familial status, and race.

Furthermore, there tends to be a lack of understanding of fair housing law, who is protected under the law, and what to do in the event of an alleged fair housing violation. The stakeholder community, as well as both providers and consumers of housing, do not understand where to turn for fair housing services nor where to go to lodge a fair housing complaint. Fair housing dialogue is often confused with affordable housing and landlord/tenant issues. At the same time, many of the respondents to the 2007 Fair Housing Survey acknowledged that additional outreach and education is necessary.

Lastly, the Fair Housing Forums illuminated one additional fair housing concern, the prospective legal risks associated with prospective zoning policies that may be designed to restrict housing suitable for families.

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE

The 2007 Analysis of Impediments to Fair Housing Choice for the North Shore HOME Consortium uncovered several issues that can be considered to be barriers to affirmatively furthering fair housing and impediments to fair housing choice. These are as follows:

1. Lack of awareness of fair housing rights
 - a. Lack of understanding of state and federal fair housing law
 - i. Uncertain of who or what groups are protected under the law
 - ii. Uncertain or lack of knowledge of what actions constitute violations of fair housing law
 - b. Insufficient outreach and education among stakeholders
2. Lack of awareness and understanding of available fair housing services
 - a. Don't know where to turn for pursuit of fair housing complaint
 - b. Lack uniformity in referrals for prospective victims of housing discrimination
 - c. Tendency to want to judge the situation prior to referral
3. Fair housing service delivery system is not as effective as desired
 - a. Complex process may be burdensome
 - i. Selected institutional barriers exist, such as MCAD difficult to access
 - ii. HUD defers to MCAD
 - iii. High proportion of complaints ruled as no cause
 - b. Lack of stakeholder exposure to fair housing training
 - c. Consumers face lack of access to fair housing complaint system
 - d. Lack of awareness of testing by providers and stakeholders alike
4. High home mortgage loan denial rates for selected minorities
 - a. Especially high denial rates in sub-prime mortgage lending markets
 - b. Concern about subprime lenders targeting key minority groups
5. Unlawful discrimination appears to be occurring in rental markets, particularly as it relates to disability, familial status, and race or national origin
 - a. Discriminatory terms and conditions in rental
 - b. Failure to make reasonable accommodation
6. The dialogue needed for the educated discussion of affirmatively furthering fair housing is constrained because of the confusion about the differences between:
 - a. Affirmatively furthering fair housing (E&O, testing, enforcement)
 - b. Promotion and provision of available and affordable housing
 - c. Discriminating between landlord/tenant issues and fair housing concerns
7. The high concentrations of minority and disabled populations tends to support the notion that housing location policies are not as inclusive as may be desired in affirmatively furthering fair housing
8. Recent case history shows that local housing authorities within the Consortium award preference to individuals on subsidized housing waiting lists based upon local residency. This may be viewed as an impediment to fair housing choice for individuals not residing within each of these local communities who may wish to move to another community; furthermore, this practice may contribute to a lack of demographic diversity within the Consortium's thirty communities

SUGGESTED ACTIONS FOR THE HOME CONSORTIUM TO CONSIDER

In so finding these impediments, the North Shore HOME Consortium should consider taking the following actions:

1. Assist in improving awareness of fair housing law
 - a. Acquire and distribute fair housing flyers and pamphlets, including materials about landlord/tenant law, to social service agencies, residential rental property agencies, faith-based organizations, Hispanic advocacy and service agencies, and other entities
 - i. Some materials should represent posters highlighting referral system, discriminatory actions, and protected class status
 - ii. Materials should address who is protected
 - iii. Materials should address what actions are not allowed
2. Assist in improving understanding of available fair housing services
 - a. Arrange for staff and related housing providers to get fair housing training
 - b. Use the Fair Housing Center of Greater Boston for some pilot testing and educational programs, particularly in the rental markets
3. Assist in improving fair housing delivery system
 - a. Arrange for additional fair housing training from the Fair Housing Center of Greater Boston
 - b. Design simple set of instructions for uniform fair housing referral system
 - i. Include contact numbers, definitions of discriminatory actions and what represents protected class status
 - ii. Distribute these materials to individuals, advocates, interested parties, and government entities throughout the Consortium communities
 - c. Conduct outreach and education activities, especially to minority populations, particularly the black and Hispanic communities
 - iv. Emphasize credit operation and responsible use of credit
 - v. Work with local banking community to assist in educating housing consumers
 - vi. This includes first-time homebuyer training related to the establishment of good credit and the use of credit and wise credit choices
4. To counteract high denial rates, consider implementing first-time homebuyer training program targeted at particular types of consumers
 - a. Conduct outreach and education for prospective homebuyers
 - b. Address establishing good credit and the wise use of credit
 - i. Include discussion that helps to make prospective credit consumers aware of what constitutes predatory lending practices
 - c. Solicit support and actions of responsible lenders in the community

- d. Solicit support and actions of responsible Realtors in the community
5. Incorporate more formalized elements of fair housing planning in Consolidated Plan
 - a. Within the Consolidated Planning Process, establish an opportunity to provide descriptions that distinguish the differences between fair housing, the provision of affordable housing and landlord/tenant law
 - b. Describe the outreach and education process in clear, easy to understand terms
 - c. Open public dialogue on methods to enhance inclusive housing location in the public policy formation
 6. To aid in expanding awareness of inclusive land use policies, the Consortium might wish to consider extending fair housing training to the area's boards and commissions, as well as public and elected officials
 7. Assist in alerting involved agencies to the prospects of their involvement in institutional barriers that detract from affirmatively furthering fair housing or acting in the public interest of furthering education of fair housing and the fair housing system
 - a. An initial activity would be to provide the MCAD with the results of the NSHC Analysis of Impediments
 - b. A secondary follow-up to this would be to contact the MCAD and request a reaction to the findings of the Analysis of Impediments to Fair Housing Choice

APPENDIX A. CENSUS DATA

TABLE A.1
NORTH SHORE HOME CONSORTIUM
CENSUS AND INTERCENSAL POPULATION ESTIMATES
2000 CENSUS AND CENSUS BUREAU ESTIMATES

Geographic Area	2000	2001	2002	2003	2004	2005	2006	2000-06 % Chg.
Amesbury	16,450	16,642	16,679	16,679	16,619	16,552	16,542	0.56
Andover	31,247	32,386	32,495	32,521	32,643	32,866	33,475	7.13
Beverly	39,862	40,162	40,195	40,110	39,894	39,665	39,538	-0.81
Boxford	7,921	8,115	8,171	8,184	8,162	8,131	8,127	2.60
Danvers	25,212	25,207	25,181	25,244	25,267	25,904	25,833	2.46
Essex	3,267	3,325	3,326	3,335	3,331	3,327	3,320	1.62
Georgetown	7,377	7,637	7,704	7,790	7,904	7,996	8,110	9.94
Gloucester	30,273	30,572	30,670	30,669	30,599	30,543	30,564	0.96
Hamilton	8,315	8,392	8,413	8,402	8,370	8,306	8,267	-0.58
Haverhill	58,969	59,596	59,718	60,205	60,059	59,912	60,176	2.05
Ipswich	12,987	13,198	13,257	13,293	13,280	13,229	13,293	2.36
Lynnfield	11,542	11,623	11,632	11,620	11,557	11,481	11,443	-0.86
Manchester-by-the-Sea	5,228	5,276	5,280	5,312	5,332	5,305	5,290	1.19
Marblehead	20,377	20,478	20,463	20,377	20,226	20,184	20,231	-0.72
Merrimac	6,138	6,232	6,277	6,288	6,276	6,325	6,392	4.14
Methuen	43,789	44,345	44,542	44,610	44,527	44,361	44,259	1.07
Middleton	7,744	8,637	8,764	8,943	9,052	9,229	9,319	20.34
Newburyport	17,189	17,359	17,508	17,466	17,429	17,318	17,303	0.66
North Andover	27,202	26,882	27,078	27,092	27,065	27,009	27,196	-0.02
North Reading	13,837	13,959	13,956	13,983	13,996	13,987	13,950	0.82
Peabody	48,129	49,002	49,542	49,463	50,014	50,956	51,734	7.49
Rockport	7,767	7,814	7,817	7,795	7,749	7,720	7,687	-1.03
Rowley	5,500	5,557	5,573	5,595	5,679	5,812	5,875	6.82
Salem	40,407	41,119	42,141	41,961	41,620	41,529	41,343	2.32
Salisbury	7,827	7,931	7,963	7,997	8,101	8,238	8,438	7.81
Swampscott	14,412	14,482	14,457	14,413	14,332	14,209	14,134	-1.93
Topsfield	6,141	6,228	6,222	6,219	6,184	6,149	6,130	-0.18
Wenham	4,440	4,660	4,665	4,659	4,643	4,630	4,616	3.96
West Newbury	4,149	4,205	4,242	4,256	4,266	4,282	4,286	3.30
Wilmington	21,363	21,554	21,578	21,578	21,594	21,530	21,525	0.76
North Shore	555,061	562,575	565,509	566,059	565,770	566,685	568,396	2.40
Massachusetts	6,349,097	6,406,727	6,431,247	6,439,592	6,435,995	6,433,367	6,437,193	1.39

TABLE A.2
NORTH SHORE HOME CONSORTIUM
2000 CENSUS POPULATION BY AGE

City or Town	Under 20	20 to 24	25 to 34	35 to 54	55 to 64	65 or older	Total
Amesbury	4,625	676	2,380	5,523	1,277	1,969	16,450
Andover	9,565	885	2,816	11,136	3,014	3,831	31,247
Beverly	9,844	2,397	5,434	12,654	3,303	6,230	39,862
Boxford	2,692	189	457	3,050	793	740	7,921
Danvers	6,349	1,097	2,782	8,181	2,472	4,331	25,212
Essex	845	119	361	1,210	289	443	3,267
Georgetown	2,239	243	833	2,742	629	691	7,377
Gloucester	7,248	1,374	3,781	10,151	3,006	4,713	30,273
Hamilton	2,415	352	1,189	2,845	647	867	8,315
Haverhill	16,474	3,212	9,234	18,048	4,454	7,547	58,969
Ipswich	3,195	447	1,278	4,675	1,361	2,031	12,987
Lynnfield	3,063	360	932	3,842	1,358	1,987	11,542
Manchester-by-the-Sea	1,330	152	437	1,769	681	859	5,228
Marblehead	5,129	457	2,106	7,239	2,269	3,177	20,377
Merrimac	1,897	188	693	2,170	515	675	6,138
Methuen	11,796	2,232	5,962	13,533	3,547	6,719	43,789
Middleton	1,965	465	1,204	2,719	652	739	7,744
Newburyport	3,796	519	2,285	6,394	1,781	2,414	17,189
North Andover	7,993	1,505	2,995	8,890	2,175	3,644	27,202
Peabody	11,615	2,063	5,957	15,163	4,933	8,398	48,129
Rockport	1,768	226	651	2,671	880	1,571	7,767
Rowley	1,652	209	573	2,134	417	515	5,500
Salem	9,292	3,073	6,877	12,123	3,326	5,716	40,407
Salisbury	1,996	352	1,017	2,674	857	931	7,827
Swampscott	3,682	423	1,470	4,889	1,399	2,549	14,412
Topsfield	1,843	173	408	2,181	589	947	6,141
Wenham	1,474	550	265	1,198	329	624	4,440
West Newbury	1,314	110	298	1,667	395	365	4,149
North Reading	4,063	505	1,556	4,945	1,324	1,444	13,837
Wilmington	6,292	875	2,941	7,075	1,869	2,311	21,363
Total	147,451	25,428	69,172	183,491	50,541	78,978	555,061

TABLE A.3
NORTH SHORE POPULATION BY GENDER
2000 CENSUS: SF1

City or Town	Male 65 or older	Total Male	Female 65 or older	Total Female	Total
Amesbury	766	7,932	1,203	8,518	16,450
Andover	1,528	15,050	2,303	16,197	31,247
Beverly	2,327	18,851	3,903	21,011	39,862
Boxford	351	3,939	389	3,982	7,921
Danvers	1,694	11,721	2,637	13,491	25,212
Essex	197	1,606	246	1,661	3,267
Georgetown	293	3,663	398	3,714	7,377
Gloucester	1,875	14,502	2,838	15,771	30,273
Hamilton	391	4,090	476	4,225	8,315
Haverhill	2,826	27,984	4,721	30,985	58,969
Ipswich	771	6,145	1,260	6,842	12,987
Lynnfield	897	5,658	1,090	5,884	11,542
Manchester-by-the-Sea	370	2,468	489	2,760	5,228
Marblehead	1,339	9,611	1,838	10,766	20,377
Merrimac	294	2,988	381	3,150	6,138
Methuen	2,539	20,967	4,180	22,822	43,789
Middleton	317	4,503	422	3,241	7,744
Newburyport	919	7,982	1,495	9,207	17,189
North Andover	1,333	13,099	2,311	14,103	27,202
Peabody	3,335	23,047	5,063	25,082	48,129
Rockport	598	3,576	973	4,191	7,767
Rowley	198	2,720	317	2,780	5,500
Salem	2,206	18,745	3,510	21,662	40,407
Salisbury	403	3,863	528	3,964	7,827
Swampscott	981	6,685	1,568	7,727	14,412
Topsfield	412	2,979	535	3,162	6,141
Wenham	256	2,006	368	2,434	4,440
West Newbury	161	2,069	204	2,080	4,149
North Reading	625	6,818	819	7,019	13,837
Wilmington	935	10,580	1,376	10,783	21,363
Total	31,137	265,847	47,841	289,214	555,061

**TABLE A.4
POPULATION BY RACE AND ETHNICITY**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Amesbury	2661	1	802	0	7	4	0	2	0	815	6
Amesbury	2661	2	576	6	0	0	0	0	1	583	4
Amesbury	2661	3	1,194	17	2	4	0	1	5	1,223	3
Amesbury	2661	4	813	3	1	6	2	3	4	832	8
Amesbury	2661	5	442	0	1	6	0	5	13	467	7
Amesbury	2662	1	2,029	23	6	19	0	11	50	2,138	27
Amesbury	2662	2	2,052	14	4	7	2	6	26	2,111	33
Amesbury	2662	3	1,228	1	1	11	0	0	2	1,243	4
Amesbury	2663	1	711	2	1	8	0	0	7	729	10
Amesbury	2663	2	1,247	17	4	9	0	5	10	1,292	9
Amesbury	2663	3	1,637	3	8	14	0	5	18	1,685	12
Amesbury	2664	1	833	16	0	3	0	0	10	862	9
Amesbury	2664	2	725	1	0	0	0	0	13	739	0
Amesbury	2664	3	865	0	2	1	0	1	6	875	6
Amesbury	2664	4	834	2	0	3	0	1	16	856	18
Andover	2541	1	1,021	5	0	104	0	3	5	1,138	17
Andover	2541	2	1,166	6	0	35	0	3	6	1,216	16
Andover	2541	3	1,419	15	1	99	0	13	10	1,557	17
Andover	2541	4	838	6	2	12	0	0	2	860	7
Andover	2541	5	718	9	0	34	0	10	4	775	15
Andover	2542	1	1,656	12	5	33	4	46	17	1,773	84
Andover	2542	2	1,183	5	0	40	0	7	13	1,248	12
Andover	2542	3	1,068	11	0	43	0	10	13	1,145	19
Andover	2543.01	3	1,556	12	0	151	0	5	25	1,749	23
Andover	2543.01	4	2,012	33	0	97	0	9	11	2,162	27
Andover	2543.02	1	2,207	10	2	102	6	11	12	2,350	21
Andover	2543.02	2	919	2	0	38	0	2	11	972	12
Andover	2543.02	9	974	12	0	82	0	0	10	1,078	8
Andover	2544.01	1	2,639	12	0	133	0	8	23	2,815	23
Andover	2544.02	7	1,202	13	0	117	0	12	15	1,359	16
Andover	2544.02	8	1,312	29	7	226	0	110	64	1,748	183
Andover	2544.02	9	3,142	22	1	264	0	8	32	3,469	48
Andover	2544.03	1	3,589	20	1	181	1	5	36	3,833	19
Beverly	2171	1	2,717	10	1	26	0	12	19	2,785	39
Beverly	2171	2	1,823	52	1	57	3	14	28	1,978	42
Beverly	2171	3	2,469	7	6	47	0	8	36	2,573	34
Beverly	2172.01	1	513	0	0	1	0	3	4	521	6
Beverly	2172.01	2	550	0	0	0	0	0	0	550	7
Beverly	2172.01	3	1,857	91	6	80	0	15	33	2,082	57
Beverly	2172.01	4	1,244	4	0	5	0	0	11	1,264	2
Beverly	2172.02	1	899	3	0	8	0	0	6	916	4
Beverly	2172.02	2	569	2	0	3	0	2	2	578	7
Beverly	2172.02	3	1,012	1	7	5	0	3	14	1,042	9
Beverly	2172.02	4	1,069	1	1	5	0	1	3	1,080	8
Beverly	2173	1	513	1	0	1	0	0	0	515	4
Beverly	2173	2	1,085	22	1	12	0	10	29	1,159	40
Beverly	2173	3	1,139	17	1	16	0	10	22	1,205	42
Beverly	2173	6	782	25	6	2	2	26	17	860	61
Beverly	2173	7	990	15	0	5	1	10	13	1,034	32
Beverly	2174	1	782	15	1	8	0	3	7	816	14
Beverly	2174	2	1,309	28	3	22	2	16	18	1,398	48
Beverly	2174	3	1,253	19	2	26	0	4	10	1,314	23
Beverly	2174	4	1,548	43	13	51	3	30	29	1,717	73
Beverly	2175	1	939	2	0	3	0	3	6	953	9
Beverly	2175	2	978	3	6	12	0	3	9	1,011	11
Beverly	2175	3	1,072	1	2	7	0	1	9	1,092	8
Beverly	2175	4	708	1	2	5	0	1	6	723	4
Beverly	2175	5	1,132	7	5	4	1	4	2	1,155	21

TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Beverly	2175	6	1,544	10	3	10	0	12	13	1,592	34
Beverly	2176	1	2,698	13	2	22	0	12	20	2,767	35
Beverly	2176	2	713	0	0	6	0	0	8	727	1
Beverly	2176	3	1,075	2	1	6	0	0	10	1,094	3
Beverly	2176	4	1,740	11	0	15	0	1	6	1,773	4
Beverly	2176	9	1,535	7	0	41	0	3	2	1,588	38
Boxford	2131	1	1,799	8	0	28	0	2	13	1,850	12
Boxford	2131	2	1,394	0	1	15	0	9	16	1,435	19
Boxford	2131	3	2,945	14	1	33	1	4	13	3,011	20
Boxford	2131	9	1,575	5	7	20	1	8	9	1,625	16
Danvers	2111	1	863	0	0	8	0	0	3	874	8
Danvers	2111	2	1,258	9	0	11	0	6	7	1,291	14
Danvers	2111	3	862	0	1	26	1	4	8	902	23
Danvers	2111	4	653	3	0	17	2	0	6	681	3
Danvers	2112	1	1,059	2	2	23	0	5	7	1,098	1
Danvers	2112	2	1,620	9	6	21	1	0	5	1,662	10
Danvers	2112	3	1,650	1	2	14	0	11	5	1,683	24
Danvers	2112	4	1,961	6	7	16	0	3	25	2,018	17
Danvers	2113	1	2,035	2	0	24	0	5	9	2,075	19
Danvers	2113	2	1,542	0	3	27	0	2	4	1,578	8
Danvers	2113	9	3,146	3	0	15	0	6	9	3,179	30
Danvers	2114	1	1,078	4	0	5	0	0	1	1,088	3
Danvers	2114	2	1,997	10	0	15	0	6	6	2,034	16
Danvers	2114	3	1,398	5	3	17	0	2	5	1,430	6
Danvers	2114	4	2,238	26	1	23	0	5	15	2,308	23
Danvers	2114	9	1,278	7	0	19	0	0	7	1,311	5
Essex	2221	1	964	2	1	3	0	5	6	981	12
Essex	2221	2	1,410	3	0	4	1	2	6	1,426	14
Essex	2221	3	844	0	3	7	0	0	6	860	4
Georgetown	2651.01	1	786	2	4	3	0	4	1	800	1
Georgetown	2651.01	2	802	0	0	1	0	1	3	807	6
Georgetown	2651.01	3	991	5	0	3	0	0	3	1,002	7
Georgetown	2651.01	4	919	1	0	7	0	4	1	932	10
Georgetown	2651.02	1	1,326	0	2	6	0	0	9	1,343	4
Georgetown	2651.02	2	2,444	3	4	11	0	14	17	2,493	19
Gloucester	2211	1	1,352	7	2	7	0	1	15	1,384	6
Gloucester	2211	2	1,545	3	0	5	0	1	2	1,556	8
Gloucester	2211	3	1,354	3	2	7	0	1	10	1,377	6
Gloucester	2213	1	600	1	0	7	0	1	10	619	11
Gloucester	2213	2	1,583	5	1	14	0	1	17	1,621	10
Gloucester	2213	3	938	6	0	4	1	2	13	964	13
Gloucester	2213	4	1,485	3	2	10	0	1	5	1,506	10
Gloucester	2214	1	978	9	1	13	1	14	37	1,053	42
Gloucester	2214	2	1,887	13	1	11	0	25	10	1,947	55
Gloucester	2214	3	141	1	0	4	0	5	4	155	5
Gloucester	2214	4	357	2	4	0	0	4	5	372	7
Gloucester	2215	1	1,513	14	4	7	0	34	26	1,598	63
Gloucester	2215	2	1,581	27	0	9	1	5	21	1,644	27
Gloucester	2216	1	264	0	0	0	3	0	0	267	3
Gloucester	2216	2	770	3	1	6	0	3	12	795	7
Gloucester	2216	3	985	12	0	11	1	11	13	1,033	22
Gloucester	2216	4	607	21	2	5	0	8	19	662	23
Gloucester	2217	1	1,095	1	0	5	0	17	12	1,130	31
Gloucester	2217	2	1,823	13	2	3	0	4	4	1,849	15
Gloucester	2218	1	1,045	3	0	6	0	3	3	1,060	5
Gloucester	2218	2	707	0	1	2	0	0	2	712	4
Gloucester	2219	1	1,305	19	0	58	0	2	19	1,403	31
Gloucester	2219	2	1,060	6	3	6	0	5	10	1,090	12
Gloucester	2219	4	2,440	5	4	7	0	2	19	2,477	18
Gloucester	2219	9	1,946	9	7	11	0	2	24	1,999	15

TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Hamilton	2151	1	2,154	2	3	20	1	3	13	2,196	10
Hamilton	2151	2	1,097	1	0	20	0	0	11	1,129	19
Hamilton	2151	3	1,593	1	6	12	1	7	7	1,627	14
Hamilton	2151	4	625	9	3	2	0	6	3	648	11
Hamilton	2151	5	2,363	26	2	300	2	12	10	2,715	28
Haverhill	2601	1	1,414	94	5	11	0	355	53	1,932	587
Haverhill	2601	2	742	91	8	19	2	129	34	1,025	303
Haverhill	2601	3	804	55	19	26	0	100	46	1,050	291
Haverhill	2602	1	1,469	95	6	8	4	101	33	1,716	207
Haverhill	2602	2	1,480	74	9	18	2	87	58	1,728	178
Haverhill	2603.01	1	1,752	17	5	15	0	15	24	1,828	41
Haverhill	2603.01	2	1,825	24	5	6	0	9	19	1,888	33
Haverhill	2603.01	3	1,076	5	1	10	0	1	2	1,095	12
Haverhill	2603.02	1	942	0	1	8	0	4	13	968	6
Haverhill	2603.02	2	2,167	22	0	21	0	3	20	2,233	24
Haverhill	2604.01	1	1,755	44	7	32	0	56	18	1,912	104
Haverhill	2604.01	2	1,382	15	1	6	0	8	9	1,421	32
Haverhill	2604.01	3	460	5	1	3	0	9	1	479	9
Haverhill	2604.02	1	2,128	40	4	25	0	22	42	2,261	88
Haverhill	2604.02	2	2,271	2	4	31	0	4	39	2,351	31
Haverhill	2604.02	3	883	13	0	13	0	4	6	919	57
Haverhill	2605	1	1,512	35	5	5	0	10	32	1,599	50
Haverhill	2605	2	1,292	21	2	6	1	5	28	1,355	28
Haverhill	2605	3	784	6	1	4	0	3	3	801	13
Haverhill	2606	1	662	8	0	2	0	8	4	684	18
Haverhill	2606	2	965	36	0	2	0	67	15	1,085	128
Haverhill	2606	3	918	77	3	8	0	123	35	1,164	231
Haverhill	2607	1	1,849	74	3	125	2	89	49	2,191	211
Haverhill	2607	2	2,047	30	2	29	2	106	31	2,247	170
Haverhill	2608	1	1,946	85	2	34	0	254	154	2,475	536
Haverhill	2608	2	1,665	100	14	23	2	406	121	2,331	659
Haverhill	2609	1	848	11	0	17	0	8	21	905	25
Haverhill	2609	2	976	43	4	12	0	101	65	1,201	193
Haverhill	2609	3	696	38	1	21	0	117	24	897	170
Haverhill	2609	4	1,634	36	0	33	0	80	29	1,812	210
Haverhill	2610	1	961	32	0	3	0	26	11	1,033	51
Haverhill	2610	2	1,740	47	9	13	0	45	34	1,888	88
Haverhill	2610	3	1,172	7	0	21	0	13	8	1,221	43
Haverhill	2611.01	1	1,418	6	2	3	0	4	3	1,436	11
Haverhill	2611.01	2	1,356	25	1	30	0	44	26	1,482	57
Haverhill	2611.01	3	1,533	23	2	19	0	2	9	1,588	14
Haverhill	2611.02	1	3,176	60	2	99	0	109	66	3,512	230
Haverhill	2611.02	2	1,178	23	0	40	3	9	3	1,256	35
Ipswich	2231	1	2,360	7	1	11	0	2	22	2,403	15
Ipswich	2231	2	1,646	9	0	12	0	7	9	1,683	35
Ipswich	2232	1	1,124	6	1	21	0	2	19	1,173	6
Ipswich	2232	2	1,478	9	3	15	0	9	16	1,530	14
Ipswich	2232	3	961	0	2	3	0	9	7	982	12
Ipswich	2233	1	1,887	12	0	19	0	2	15	1,935	19
Ipswich	2233	2	2,228	6	1	18	1	6	9	2,269	22
Ipswich	2233	3	991	2	3	5	0	6	5	1,012	12
Lynnfield	2091	1	1,304	5	0	37	1	5	11	1,363	6
Lynnfield	2091	2	948	13	0	12	0	5	14	992	7
Lynnfield	2091	3	1,451	8	0	14	0	3	7	1,483	5
Lynnfield	2091	4	1,086	8	0	27	0	4	4	1,129	14
Lynnfield	2091	9	1,197	1	0	34	0	1	12	1,245	8
Lynnfield	2092	1	1,116	3	0	34	0	5	8	1,166	8
Lynnfield	2092	2	1,340	0	0	21	3	0	7	1,371	5
Lynnfield	2092	3	1,272	2	0	26	0	0	0	1,300	14

**TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Lynnfield	2092	4	1,451	10	0	17	0	1	14	1,493	10
Manchester-by-the-Sea	2181	1	1,246	1	1	3	0	2	5	1,258	5
Manchester-by-the-Sea	2181	2	736	1	0	4	0	0	5	746	5
Manchester-by-the-Sea	2181	3	939	1	2	10	0	2	5	959	12
Manchester-by-the-Sea	2181	4	1,517	0	1	3	0	2	4	1,527	12
Manchester-by-the-Sea	2181	5	731	0	5	0	0	0	2	738	6
Marblehead	2031	1	1,134	3	0	12	0	5	5	1,159	10
Marblehead	2031	2	975	19	5	18	0	3	15	1,035	22
Marblehead	2031	3	1,145	1	0	5	0	1	6	1,158	6
Marblehead	2031	4	630	0	1	23	0	0	1	655	7
Marblehead	2031	5	832	1	0	14	0	0	15	862	7
Marblehead	2031	6	606	0	0	17	0	1	6	630	1
Marblehead	2031	7	702	4	2	6	0	2	1	717	8
Marblehead	2031	8	825	1	0	0	0	4	5	835	8
Marblehead	2032	1	1,068	0	0	14	0	3	3	1,088	9
Marblehead	2032	3	759	19	1	13	6	3	4	805	11
Marblehead	2032	4	799	1	0	9	0	0	4	813	8
Marblehead	2032	5	891	1	0	4	0	1	5	902	8
Marblehead	2032	6	1,057	1	1	4	0	1	4	1,068	10
Marblehead	2033	1	1,954	12	2	18	0	11	16	2,013	20
Marblehead	2033	2	1,343	1	3	7	0	1	11	1,366	9
Marblehead	2033	3	1,302	5	0	4	0	1	14	1,326	4
Marblehead	2033	4	1,075	8	0	7	0	1	6	1,097	5
Marblehead	2033	5	1,830	11	1	17	0	0	15	1,874	14
Marblehead	2033	6	952	1	0	8	0	0	13	974	12
Merrimac	2621	1	1,009	1	0	0	0	11	1	1,022	15
Merrimac	2621	2	2,883	20	3	8	0	3	21	2,938	23
Merrimac	2621	9	2,140	3	4	9	0	4	18	2,178	17
Methuen	2521.01	1	1,211	16	7	21	0	47	12	1,314	77
Methuen	2521.01	2	597	26	0	15	0	43	23	704	103
Methuen	2521.01	3	1,314	12	2	15	0	14	23	1,380	41
Methuen	2521.02	4	1,402	14	0	13	2	19	18	1,468	40
Methuen	2521.02	5	840	6	0	6	0	15	2	869	34
Methuen	2521.02	9	1,269	11	2	16	0	8	4	1,310	11
Methuen	2522.01	1	1,156	1	1	0	0	18	6	1,182	52
Methuen	2522.01	2	1,769	9	2	29	0	40	23	1,872	92
Methuen	2522.02	1	1,781	6	6	35	0	29	11	1,868	46
Methuen	2522.02	2	1,213	0	0	18	0	4	1	1,236	25
Methuen	2523	1	566	6	0	11	0	18	8	609	24
Methuen	2523	2	776	27	2	8	0	142	48	1,003	324
Methuen	2523	3	1,057	14	25	21	0	139	23	1,279	207
Methuen	2523	4	783	24	4	17	0	99	23	950	151
Methuen	2523	5	1,340	18	1	32	0	86	43	1,520	139
Methuen	2523	6	511	4	2	4	0	35	6	562	65
Methuen	2524	1	849	32	2	5	0	148	24	1,060	263
Methuen	2524	2	843	95	10	25	0	431	113	1,517	886
Methuen	2524	3	531	35	4	41	1	306	78	996	562
Methuen	2524	4	230	13	0	8	0	159	21	431	228
Methuen	2525.01	1	1,513	23	9	62	0	57	37	1,701	173
Methuen	2525.01	2	792	25	0	25	0	22	25	889	80
Methuen	2525.01	3	820	33	1	5	0	50	14	923	107
Methuen	2525.02	1	1,591	15	3	35	0	26	27	1,697	68
Methuen	2525.02	5	1,110	12	0	16	0	10	8	1,156	29
Methuen	2525.02	6	1,696	24	0	37	0	25	31	1,813	65
Methuen	2526.01	2	1,457	14	3	50	0	10	14	1,548	31
Methuen	2526.01	3	1,076	4	0	48	2	5	10	1,145	18
Methuen	2526.01	4	1,208	9	1	40	0	4	9	1,271	32
Methuen	2526.01	5	1,961	19	5	151	0	45	22	2,203	83
Methuen	2526.02	1	1,604	21	3	67	0	27	47	1,769	67

TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Methuen	2526.02	9	1,729	15	1	24	0	11	18	1,798	36
Methuen	2526.03	1	2,531	8	1	140	0	39	27	2,746	62
Middleton	2121	1	962	4	0	8	0	0	9	983	2
Middleton	2121	2	1,954	1	0	20	0	5	14	1,994	10
Middleton	2121	3	1,937	4	0	36	3	1	16	1,997	3
Middleton	2121	9	2,537	119	4	22	1	15	72	2,770	470
Newburyport	2681	3	825	0	1	8	1	3	6	844	15
Newburyport	2681	4	1,531	9	0	13	0	4	5	1,562	9
Newburyport	2682	1	1,322	1	1	5	0	0	8	1,337	13
Newburyport	2682	2	942	1	4	2	0	1	5	955	4
Newburyport	2682	3	1,432	7	1	15	0	2	7	1,464	14
Newburyport	2682	4	2,214	9	4	26	0	5	13	2,271	21
Newburyport	2683	1	1,245	9	0	6	0	3	4	1,267	12
Newburyport	2683	2	1,469	2	5	1	1	1	4	1,483	12
Newburyport	2683	3	809	5	0	5	0	2	5	826	7
Newburyport	2683	4	555	2	1	3	0	1	9	571	8
Newburyport	2684	1	716	3	0	2	0	1	2	724	5
Newburyport	2684	2	1,108	12	1	3	0	0	9	1,133	11
Newburyport	2684	3	1,131	5	1	1	0	1	8	1,147	9
Newburyport	2684	4	1,565	8	2	15	0	3	12	1,605	11
North Andover	2531	1	1,039	12	0	7	0	16	3	1,077	24
North Andover	2531	2	495	0	0	5	0	5	1	506	9
North Andover	2531	3	601	0	0	9	0	3	3	616	8
North Andover	2531	4	1,501	9	0	17	0	9	25	1,561	28
North Andover	2531	5	706	6	0	15	0	17	2	746	34
North Andover	2531	6	985	2	1	8	0	5	6	1,007	17
North Andover	2532.01	1	1,854	11	0	87	0	5	22	1,979	29
North Andover	2532.01	2	903	14	5	9	0	12	8	951	32
North Andover	2532.02	3	344	0	0	4	0	3	4	355	5
North Andover	2532.02	4	2,627	57	4	110	0	70	51	2,919	166
North Andover	2532.02	5	3,017	36	0	275	0	18	46	3,392	79
North Andover	2532.03	1	929	0	0	28	0	3	3	963	11
North Andover	2532.03	6	1,313	7	1	19	0	2	4	1,346	7
North Andover	2532.03	9	1,255	2	1	30	1	3	9	1,301	7
North Andover	2532.04	1	1,106	11	0	134	0	8	9	1,268	14
North Andover	2532.04	2	2,699	4	2	169	1	4	12	2,891	26
North Andover	2532.05	1	2,439	11	0	71	0	5	11	2,537	26
North Andover	2532.05	2	1,668	14	0	81	0	13	11	1,787	19
North Reading	3301	1	1,061	0	0	13	0	0	10	1,084	10
North Reading	3301	2	2,211	9	1	25	0	5	15	2,266	18
North Reading	3301	3	1,342	2	0	15	0	0	7	1,366	8
North Reading	3301	9	2,950	7	0	36	0	14	12	3,019	20
North Reading	3302	1	2,425	9	2	36	0	4	11	2,487	21
North Reading	3302	2	2,341	14	1	41	0	6	11	2,414	13
North Reading	3302	3	1,165	14	2	14	1	4	1	1,201	12
Peabody	2101	1	2,694	8	3	49	0	7	24	2,785	24
Peabody	2101	2	1,480	22	1	30	0	8	3	1,544	18
Peabody	2101	3	1,490	12	0	9	0	6	10	1,527	9
Peabody	2101	4	1,325	3	0	33	0	0	6	1,367	10
Peabody	2102	1	1,378	14	5	26	0	0	13	1,436	18
Peabody	2102	2	1,955	10	0	38	0	2	11	2,016	25
Peabody	2102	3	2,210	18	0	27	1	1	17	2,274	18
Peabody	2103	1	1,233	14	0	79	0	17	20	1,363	31
Peabody	2103	2	2,250	9	2	23	0	9	17	2,310	14
Peabody	2103	3	2,270	22	0	29	0	2	8	2,331	8
Peabody	2104	1	2,440	48	7	51	0	26	55	2,627	45
Peabody	2104	2	2,451	23	1	29	0	30	45	2,579	66
Peabody	2104	3	699	1	0	14	0	2	2	718	9
Peabody	2104	4	632	0	1	12	0	6	2	653	11

TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Peabody	2105	1	1,067	4	0	5	0	18	25	1,119	29
Peabody	2105	2	478	2	0	0	0	0	2	482	5
Peabody	2105	3	1,298	3	0	9	0	4	18	1,332	6
Peabody	2105	4	3,262	47	2	76	1	10	27	3,425	21
Peabody	2106	1	1,450	7	1	3	0	30	35	1,526	75
Peabody	2106	2	697	6	0	1	0	0	0	704	13
Peabody	2106	3	1,166	23	0	7	0	21	22	1,239	88
Peabody	2106	4	549	3	1	4	0	0	8	565	3
Peabody	2107	1	990	40	2	29	0	96	24	1,181	177
Peabody	2107	2	676	10	0	6	0	12	8	712	18
Peabody	2107	3	1,105	21	4	5	4	78	36	1,253	145
Peabody	2107	4	612	23	7	18	1	179	73	913	205
Peabody	2108	1	1,242	3	5	4	0	38	68	1,360	81
Peabody	2108	2	602	15	4	2	0	132	56	811	181
Peabody	2108	3	1,629	24	9	29	0	107	122	1,920	213
Peabody	2109	1	1,278	15	0	4	0	15	18	1,330	32
Peabody	2109	3	1,683	14	0	9	0	27	65	1,798	44
Peabody	2109	4	913	2	2	7	0	0	5	929	9
Rockport	2201	1	2,334	7	9	10	1	20	14	2,395	28
Rockport	2201	2	1,302	1	2	3	0	6	18	1,332	12
Rockport	2201	3	844	1	2	5	0	0	6	858	8
Rockport	2201	4	985	7	3	9	0	2	5	1,011	8
Rockport	2201	5	864	1	1	3	1	4	7	881	10
Rockport	2201	6	1,262	4	0	5	0	8	11	1,290	17
Rowley	2701	1	2,620	6	9	8	0	8	11	2,662	28
Rowley	2701	2	2,791	7	5	17	0	7	11	2,838	19
Salem	2041.01	1	627	5	0	19	0	35	8	694	49
Salem	2041.01	2	1,153	5	2	5	0	14	20	1,199	24
Salem	2041.01	3	1,093	35	0	28	2	27	22	1,207	74
Salem	2041.01	4	1,557	142	4	117	1	193	80	2,094	252
Salem	2041.02	1	1,638	77	2	7	0	30	10	1,764	85
Salem	2041.02	2	2,082	13	1	31	0	27	40	2,194	50
Salem	2042	1	1,012	18	4	6	0	33	29	1,102	73
Salem	2042	2	446	90	5	26	0	180	59	806	317
Salem	2042	3	970	30	6	16	0	101	25	1,148	160
Salem	2042	4	697	11	0	16	2	46	40	812	67
Salem	2042	5	916	12	0	10	0	27	14	979	36
Salem	2043	1	994	13	1	10	0	12	15	1,045	39
Salem	2043	2	410	90	10	30	0	667	86	1,293	904
Salem	2043	3	672	124	12	6	0	595	124	1,533	1,020
Salem	2044	1	759	12	2	6	0	20	5	804	26
Salem	2044	2	1,014	46	3	15	2	6	15	1,101	30
Salem	2044	3	706	9	0	5	1	8	5	734	20
Salem	2044	4	835	13	1	6	0	13	16	884	34
Salem	2045	1	1,210	28	9	12	1	13	25	1,298	41
Salem	2045	2	743	18	0	7	0	41	26	835	52
Salem	2045	3	817	10	0	17	0	15	15	874	22
Salem	2046	1	524	4	0	10	0	23	28	589	56
Salem	2046	2	641	10	0	12	0	12	2	677	18
Salem	2046	3	722	19	2	0	3	17	2	765	41
Salem	2046	4	810	16	0	26	0	61	22	935	84
Salem	2046	5	879	8	2	11	0	11	18	929	16
Salem	2046	6	754	2	1	2	0	16	10	785	26
Salem	2046	7	529	19	0	10	0	1	10	569	15
Salem	2047.01	1	744	5	0	16	0	1	8	774	12
Salem	2047.01	2	1,175	67	3	24	0	112	40	1,421	167
Salem	2047.01	3	2,247	156	9	63	2	214	93	2,784	427
Salem	2047.02	1	777	88	0	41	0	56	30	992	104
Salem	2047.02	2	1,020	11	2	17	0	28	16	1,094	57

TABLE A.4 CONT.
POPULATION BY RACE AND ETHNICITY
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF1

City	Census Tract	Block Group	White	Black	AI & AN	Asian	NH & OPI	Some Other Race	Two or More Races	Total	Hispanic or Latino
Salem	2047.02	3	2,524	52	6	152	5	50	29	2,818	98
Salem	2047.02	4	800	16	0	28	0	19	12	875	45
Salisbury	2671.01	1	3,120	20	12	10	1	9	21	3,193	39
Salisbury	2671.02	2	1,535	3	9	2	0	0	19	1,568	11
Salisbury	2671.02	3	1,103	4	3	2	0	5	9	1,126	10
Salisbury	2671.02	4	637	1	0	1	0	0	10	649	5
Salisbury	2671.02	5	1,240	4	0	12	6	6	23	1,291	27
Swampscott	2021	1	2,305	20	1	14	0	16	13	2,369	28
Swampscott	2021	2	881	3	0	0	0	0	1	885	9
Swampscott	2021	3	723	14	2	7	0	0	7	753	14
Swampscott	2021	4	779	4	0	2	0	0	4	789	7
Swampscott	2021	5	827	14	1	8	1	1	2	854	8
Swampscott	2021	6	1,249	6	1	4	1	2	12	1,275	12
Swampscott	2021	7	1,278	12	1	17	0	4	11	1,323	30
Swampscott	2022	1	514	2	0	0	0	2	4	522	5
Swampscott	2022	2	1,104	4	0	9	1	2	15	1,135	5
Swampscott	2022	3	1,013	6	0	12	0	1	8	1,040	15
Swampscott	2022	4	1,618	9	2	10	0	1	13	1,653	17
Swampscott	2022	5	1,032	10	0	14	0	7	8	1,071	15
Swampscott	2022	6	724	2	1	1	0	5	10	743	18
Topsfield	2141	1	1,615	6	0	18	0	1	7	1,647	9
Topsfield	2141	2	1,427	2	2	7	0	6	12	1,456	13
Topsfield	2141	3	2,204	9	0	19	0	10	19	2,261	22
Topsfield	2141	4	757	6	0	8	0	4	2	777	7
Wenham	2161	1	931	0	1	6	0	0	5	943	4
Wenham	2161	2	1,736	2	0	27	0	1	6	1,772	11
Wenham	2161	9	1,677	17	0	27	0	2	2	1,725	11
West Newbury	2631	1	1,506	4	0	15	0	2	1	1,528	10
West Newbury	2631	2	841	3	1	3	0	0	2	850	1
West Newbury	2631	3	1,739	1	0	4	0	13	14	1,771	16
Wilmington	3311.01	3	1,215	2	1	19	0	0	11	1,248	11
Wilmington	3311.01	4	1,499	20	0	94	0	16	17	1,646	29
Wilmington	3311.02	1	1,314	2	0	22	0	3	2	1,343	5
Wilmington	3311.02	2	1,684	8	1	20	0	4	18	1,735	7
Wilmington	3311.02	3	2,172	1	1	32	0	22	16	2,244	37
Wilmington	3311.02	4	1,254	1	0	46	0	1	7	1,309	7
Wilmington	3312	2	2,584	4	4	46	1	4	16	2,659	20
Wilmington	3312	3	2,345	12	2	28	0	12	17	2,416	23
Wilmington	3313	1	2,260	23	3	65	0	8	22	2,381	25
Wilmington	3313	2	4,248	15	5	62	0	20	32	4,382	39
Total			522,443	5,836	768	9,471	127	9,727	6,689	555,061	20,392

TABLE A.5
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Amesbury	2661	1	29	0	198	199	426	20.43
Amesbury	2661	2	0	7	63	70	140	17.35
Amesbury	2661	3	0	14	49	6	69	9.58
Amesbury	2661	4	0	9	58	53	120	17.88
Amesbury	2661	5	13	0	17	56	86	10.39
Amesbury	2662	1	28	3	80	51	162	13.68
Amesbury	2662	2	21	4	244	61	330	25.35
Amesbury	2662	3	0	10	16	39	65	12.95
Amesbury	2663	1	0	0	46	19	65	6.51
Amesbury	2663	2	0	0	50	67	117	12.01
Amesbury	2663	3	21	43	157	87	308	19.00
Amesbury	2664	1	7	0	6	14	27	2.95
Amesbury	2664	2	0	17	64	21	102	15.11
Amesbury	2664	3	11	12	66	31	120	12.41
Amesbury	2664	4	46	0	83	44	173	18.04
Andover	2541	1	11	0	91	69	171	15.03
Andover	2541	2	0	0	62	29	91	16.02
Andover	2541	3	44	13	29	9	95	11.36
Andover	2541	4	0	0	29	10	39	6.89
Andover	2541	5	0	0	9	36	45	6.94
Andover	2542	1	8	0	0	44	52	7.29
Andover	2542	2	0	0	69	47	116	10.61
Andover	2542	3	17	0	47	45	109	15.35
Andover	2543.01	3	13	0	31	75	119	15.26
Andover	2543.01	4	15	0	36	61	112	14.47
Andover	2543.02	1	0	14	43	10	67	6.65
Andover	2543.02	2	32	0	179	122	333	17.36
Andover	2543.02	9	7	0	115	48	170	13.41
Andover	2544.01	1	14	0	112	36	162	12.93
Andover	2544.02	7	0	0	54	24	78	7.35
Andover	2544.02	8	25	17	132	75	249	14.53
Andover	2544.02	9	0	15	75	0	90	9.92
Andover	2544.03	1	0	10	29	38	77	12.58
Beverly	2171	1	0	13	81	75	169	14.29
Beverly	2171	2	18	24	214	32	288	23.70
Beverly	2171	3	12	64	171	72	319	16.67
Beverly	2172.01	1	10	0	186	215	411	27.16
Beverly	2172.01	2	24	18	268	122	432	20.25
Beverly	2172.01	3	33	0	132	129	294	27.07
Beverly	2172.01	4	8	25	131	15	179	25.61
Beverly	2172.02	1	8	0	211	84	303	28.32
Beverly	2172.02	2	14	0	71	32	117	15.29
Beverly	2172.02	3	0	0	86	34	120	12.24
Beverly	2172.02	4	0	0	208	122	330	32.93
Beverly	2173	1	6	15	183	9	213	19.69
Beverly	2173	2	13	51	362	22	448	30.52
Beverly	2173	3	2	26	90	66	184	25.03
Beverly	2173	6	6	7	164	37	214	19.71
Beverly	2173	7	6	0	58	34	98	14.22
Beverly	2174	1	14	0	88	27	129	14.88
Beverly	2174	2	6	42	139	55	242	20.32
Beverly	2174	3	12	17	85	102	216	27.07
Beverly	2174	4	0	0	162	20	182	20.73
Beverly	2175	1	7	18	51	47	123	22.82
Beverly	2175	2	9	0	29	40	78	12.07
Beverly	2175	3	4	0	92	36	132	17.77
Beverly	2175	4	7	10	145	55	217	22.65
Beverly	2175	5	31	14	69	57	171	20.63
Beverly	2175	6	7	10	147	49	213	28.17

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Beverly	2176	1	0	11	31	28	70	13.62
Beverly	2176	2	0	0	92	31	123	17.88
Beverly	2176	3	0	15	148	168	331	23.85
Beverly	2176	4	21	42	292	54	409	15.89
Beverly	2176	9	21	12	95	18	146	16.26
Boxford	2131	1	9	11	86	71	177	17.74
Boxford	2131	2	8	0	196	112	316	11.95
Boxford	2131	3	7	0	19	10	36	4.16
Boxford	2131	9	8	4	31	47	90	7.21
Danvers	2111	1	8	0	59	71	138	15.74
Danvers	2111	2	0	0	78	82	160	11.45
Danvers	2111	3	0	0	66	33	99	9.43
Danvers	2111	4	16	0	97	21	134	10.98
Danvers	2112	1	8	7	65	65	145	13.71
Danvers	2112	2	8	19	54	130	211	16.43
Danvers	2112	3	20	0	40	39	99	8.06
Danvers	2112	4	0	8	67	42	117	8.33
Danvers	2113	1	31	16	275	171	493	19.56
Danvers	2113	2	0	0	89	45	134	9.31
Danvers	2113	9	10	37	210	17	274	18.51
Danvers	2114	1	9	0	69	29	107	8.05
Danvers	2114	2	15	14	147	47	223	17.97
Danvers	2114	3	28	0	137	88	253	13.15
Danvers	2114	4	8	0	117	87	212	9.85
Danvers	2114	9	6	6	101	120	233	21.34
Essex	2221	1	14	5	255	106	380	17.13
Essex	2221	2	35	0	221	99	355	16.69
Essex	2221	3	0	0	278	187	465	18.13
Georgetown	2651.01	1	27	46	348	150	571	24.74
Georgetown	2651.01	2	0	9	64	33	106	16.54
Georgetown	2651.01	3	0	0	28	14	42	6.50
Georgetown	2651.01	4	11	0	55	74	140	13.61
Georgetown	2651.02	1	0	12	47	51	110	24.66
Georgetown	2651.02	2	0	11	110	80	201	15.37
Gloucester	2211	1	28	8	274	186	496	15.79
Gloucester	2211	2	0	26	252	92	370	25.50
Gloucester	2211	3	0	0	85	32	117	18.54
Gloucester	2213	1	18	5	115	98	236	20.90
Gloucester	2213	2	25	17	57	7	106	18.79
Gloucester	2213	3	0	6	155	56	217	19.87
Gloucester	2213	4	0	0	73	34	107	14.97
Gloucester	2214	1	7	13	185	54	259	21.76
Gloucester	2214	2	0	9	97	35	141	17.92
Gloucester	2214	3	7	0	112	79	198	14.88
Gloucester	2214	4	0	0	151	198	349	45.92
Gloucester	2215	1	13	19	380	202	614	34.75
Gloucester	2215	2	13	6	167	119	305	25.31
Gloucester	2216	1	0	15	151	246	412	24.70
Gloucester	2216	2	6	18	96	77	197	22.21
Gloucester	2216	3	0	8	79	49	136	15.53
Gloucester	2216	4	10	6	51	36	103	8.96
Gloucester	2217	1	14	11	87	28	140	18.18
Gloucester	2217	2	17	15	18	64	114	18.57
Gloucester	2218	1	7	20	100	99	226	20.95
Gloucester	2218	2	8	24	135	55	222	14.32
Gloucester	2219	1	16	8	174	49	247	15.89
Gloucester	2219	2	15	0	153	92	260	13.53
Gloucester	2219	4	13	28	171	126	338	18.85
Gloucester	2219	9	8	0	69	98	175	12.11

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Hamilton	2151	1	13	4	123	116	256	8.83
Hamilton	2151	2	0	0	84	29	113	12.00
Hamilton	2151	3	35	6	141	154	336	17.60
Hamilton	2151	4	9	0	105	102	216	16.02
Hamilton	2151	5	11	0	166	56	233	11.52
Haverhill	2601	1	16	0	112	30	158	13.01
Haverhill	2601	2	6	5	76	36	123	14.06
Haverhill	2601	3	0	0	153	130	283	15.65
Haverhill	2602	1	0	0	204	41	245	13.33
Haverhill	2602	2	25	0	130	96	251	18.52
Haverhill	2603.01	1	35	8	64	23	130	7.89
Haverhill	2603.01	2	9	5	33	0	47	3.45
Haverhill	2603.01	3	6	0	142	106	254	9.07
Haverhill	2603.02	1	25	0	91	49	165	10.84
Haverhill	2603.02	2	0	20	17	47	84	5.87
Haverhill	2604.01	1	0	0	42	45	87	6.49
Haverhill	2604.01	2	0	0	71	105	176	8.04
Haverhill	2604.01	3	8	0	30	6	44	6.29
Haverhill	2604.02	1	31	9	81	45	166	7.99
Haverhill	2604.02	2	7	0	76	84	167	14.99
Haverhill	2604.02	3	14	0	106	89	209	13.50
Haverhill	2605	1	6	0	52	31	89	14.17
Haverhill	2605	2	27	0	151	21	199	8.25
Haverhill	2605	3	0	5	44	69	118	14.39
Haverhill	2606	1	21	6	146	32	205	11.85
Haverhill	2606	2	0	19	93	106	218	13.14
Haverhill	2606	3	0	0	162	130	292	11.12
Haverhill	2607	1	10	62	110	175	357	23.44
Haverhill	2607	2	5	19	230	180	434	18.53
Haverhill	2608	1	0	0	53	35	88	18.92
Haverhill	2608	2	0	0	8	34	42	8.79
Haverhill	2609	1	16	12	100	43	171	8.45
Haverhill	2609	2	18	10	172	109	309	27.30
Haverhill	2609	3	0	0	70	56	126	15.07
Haverhill	2609	4	0	0	56	15	71	13.42
Haverhill	2610	1	17	0	71	24	112	11.83
Haverhill	2610	2	28	21	124	42	215	19.60
Haverhill	2610	3	0	14	44	15	73	13.77
Haverhill	2611.01	1	20	4	126	96	246	26.86
Haverhill	2611.01	2	20	38	241	23	322	30.58
Haverhill	2611.01	3	43	17	193	26	279	38.06
Haverhill	2611.02	1	15	14	132	41	202	18.88
Haverhill	2611.02	2	7	0	45	31	83	10.52
Ipswich	2231	1	6	24	206	152	388	29.11
Ipswich	2231	2	0	7	186	36	229	17.95
Ipswich	2232	1	22	8	370	64	464	28.77
Ipswich	2232	2	0	0	84	86	170	19.27
Ipswich	2232	3	0	0	131	48	179	19.91
Ipswich	2233	1	14	0	109	58	181	19.38
Ipswich	2233	2	0	0	38	0	38	5.92
Ipswich	2233	3	0	0	56	30	86	7.62
Lynnfield	2091	1	20	0	170	60	250	16.96
Lynnfield	2091	2	3	0	87	46	136	5.34
Lynnfield	2091	3	0	0	30	5	35	5.36
Lynnfield	2091	4	17	0	18	72	107	11.52
Lynnfield	2091	9	21	0	160	175	356	22.81
Lynnfield	2092	1	14	91	73	19	197	12.77
Lynnfield	2092	2	15	0	50	16	81	6.98
Lynnfield	2092	3	0	0	31	14	45	6.55

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Lynnfield	2092	4	29	31	63	56	179	18.23
Manchester-by-the-Sea	2181	1	22	0	99	72	193	13.49
Manchester-by-the-Sea	2181	2	8	0	47	23	78	11.17
Manchester-by-the-Sea	2181	3	7	34	131	165	337	14.55
Manchester-by-the-Sea	2181	4	16	0	181	61	258	20.92
Manchester-by-the-Sea	2181	5	0	0	109	72	181	23.23
Marblehead	2031	1	0	28	95	83	206	21.87
Marblehead	2031	2	6	0	38	45	89	9.97
Marblehead	2031	3	14	8	124	31	177	15.15
Marblehead	2031	4	11	0	116	36	163	12.61
Marblehead	2031	5	25	9	85	83	202	14.08
Marblehead	2031	6	0	0	90	52	142	10.85
Marblehead	2031	7	0	0	44	27	71	12.16
Marblehead	2031	8	14	26	150	53	243	15.13
Marblehead	2032	1	9	0	54	58	121	13.52
Marblehead	2032	3	4	8	119	83	214	15.30
Marblehead	2032	4	0	9	201	41	251	25.25
Marblehead	2032	5	39	25	271	75	410	22.74
Marblehead	2032	6	0	0	0	6	6	4.44
Marblehead	2033	1	7	0	20	16	43	12.15
Marblehead	2033	2	12	10	198	230	450	29.35
Marblehead	2033	3	22	0	236	112	370	24.10
Marblehead	2033	4	0	7	15	74	96	39.51
Marblehead	2033	5	14	7	8	47	76	10.22
Marblehead	2033	6	4	22	142	25	193	19.94
Merrimac	2621	1	38	0	89	23	150	24.71
Merrimac	2621	2	0	0	120	37	157	14.66
Merrimac	2621	9	0	0	222	168	390	22.38
Methuen	2521.01	1	5	0	74	50	129	12.14
Methuen	2521.01	2	0	0	27	22	49	12.10
Methuen	2521.01	3	0	0	86	83	169	12.93
Methuen	2521.02	4	0	0	35	57	92	8.94
Methuen	2521.02	5	9	36	174	144	363	16.06
Methuen	2521.02	9	0	17	149	50	216	11.26
Methuen	2522.01	1	6	8	39	21	74	8.09
Methuen	2522.01	2	7	8	69	90	174	12.63
Methuen	2522.02	1	17	0	42	38	97	12.28
Methuen	2522.02	2	8	18	184	152	362	16.02
Methuen	2523	1	8	29	90	110	237	14.82
Methuen	2523	2	0	0	108	45	153	13.77
Methuen	2523	3	12	0	111	107	230	15.96
Methuen	2523	4	7	0	59	23	89	10.58
Methuen	2523	5	22	15	164	42	243	12.93
Methuen	2523	6	43	22	152	128	345	16.28
Methuen	2524	1	21	0	24	9	54	5.93
Methuen	2524	2	0	0	202	117	319	27.13
Methuen	2524	3	0	17	95	38	150	22.66
Methuen	2524	4	26	17	82	168	293	21.70
Methuen	2525.01	1	0	4	112	61	177	13.34
Methuen	2525.01	2	0	2	81	74	157	17.70
Methuen	2525.01	3	10	0	108	17	135	11.30
Methuen	2525.02	1	9	0	270	73	352	30.90
Methuen	2525.02	5	10	19	78	93	200	11.47
Methuen	2525.02	6	18	10	104	83	215	12.27
Methuen	2526.01	2	11	15	45	32	103	9.00
Methuen	2526.01	3	0	0	34	29	63	12.09
Methuen	2526.01	4	53	34	113	86	286	36.34
Methuen	2526.01	5	8	6	168	58	240	21.88
Methuen	2526.02	1	0	6	81	34	121	12.38

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Methuen	2526.02	9	0	0	144	131	275	20.40
Methuen	2526.03	1	0	0	39	29	68	10.99
Middleton	2121	1	43	32	254	59	388	37.13
Middleton	2121	2	46	38	254	46	384	27.57
Middleton	2121	3	0	61	240	42	343	38.63
Middleton	2121	9	8	0	70	0	78	18.44
Newburyport	2681	3	17	26	128	115	286	18.90
Newburyport	2681	4	0	0	64	105	169	20.19
Newburyport	2682	1	11	28	176	86	301	33.33
Newburyport	2682	2	12	16	296	84	408	25.74
Newburyport	2682	3	0	7	65	64	136	11.95
Newburyport	2682	4	13	12	147	116	288	17.93
Newburyport	2683	1	8	20	102	157	287	18.83
Newburyport	2683	2	32	14	117	23	186	18.81
Newburyport	2683	3	17	16	108	40	181	14.56
Newburyport	2683	4	0	25	307	90	422	20.75
Newburyport	2684	1	5	29	204	51	289	17.07
Newburyport	2684	2	0	11	181	46	238	13.78
Newburyport	2684	3	20	9	255	71	355	14.18
Newburyport	2684	4	0	0	103	17	120	12.62
North Andover	2531	1	12	0	72	60	144	32.21
North Andover	2531	2	24	0	6	28	58	8.77
North Andover	2531	3	41	0	163	119	323	21.85
North Andover	2531	4	17	17	50	56	140	20.20
North Andover	2531	5	13	0	60	63	136	15.40
North Andover	2531	6	15	5	222	125	367	20.75
North Andover	2532.01	1	0	2	93	32	127	16.67
North Andover	2532.01	2	0	0	43	44	87	28.43
North Andover	2532.02	3	77	39	281	147	544	19.54
North Andover	2532.02	4	9	85	157	61	312	9.67
North Andover	2532.02	5	8	4	15	42	69	7.52
North Andover	2532.03	1	5	17	78	21	121	10.47
North Andover	2532.03	6	9	11	11	88	119	9.87
North Andover	2532.03	9	0	0	84	10	94	9.15
North Andover	2532.04	1	35	4	226	93	358	13.67
North Andover	2532.04	2	11	20	104	20	155	6.90
North Andover	2532.05	1	44	10	75	11	140	8.30
North Andover	2532.05	2	15	0	35	57	107	10.67
North Reading	3301	1	7	0	51	32	90	7.95
North Reading	3301	2	8	11	60	212	291	18.81
North Reading	3301	3	17	0	42	60	119	15.26
North Reading	3301	9	8	0	12	15	35	5.11
North Reading	3302	1	12	6	92	92	202	12.18
North Reading	3302	2	14	23	89	46	172	14.10
North Reading	3302	3	0	14	182	153	349	31.81
Peabody	2101	1	6	19	45	28	98	6.08
Peabody	2101	2	19	0	40	36	95	4.97
Peabody	2101	3	28	8	59	45	140	6.37
Peabody	2101	4	5	0	35	42	82	9.39
Peabody	2102	1	4	0	80	26	110	10.62
Peabody	2102	2	30	14	148	92	284	11.04
Peabody	2102	3	8	0	56	68	132	10.36
Peabody	2103	1	5	5	109	25	144	8.86
Peabody	2103	2	71	0	131	81	283	8.85
Peabody	2103	3	31	35	215	68	349	10.08
Peabody	2104	1	27	19	420	37	503	28.92
Peabody	2104	2	33	14	215	165	427	44.62
Peabody	2104	3	31	5	241	58	335	34.08
Peabody	2104	4	52	15	226	55	348	22.73

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Peabody	2105	1	11	23	246	253	533	34.50
Peabody	2105	2	0	29	79	104	212	12.92
Peabody	2105	3	19	0	175	130	324	18.77
Peabody	2105	4	11	0	150	71	232	22.07
Peabody	2106	1	32	6	58	6	102	11.11
Peabody	2106	2	0	16	133	206	355	17.99
Peabody	2106	3	0	0	216	71	287	15.65
Peabody	2106	4	34	5	167	72	278	22.94
Peabody	2107	1	0	5	27	8	40	8.18
Peabody	2107	2	7	11	196	58	272	12.11
Peabody	2107	3	27	28	216	40	311	15.00
Peabody	2107	4	0	0	55	20	75	9.84
Peabody	2108	1	12	6	186	94	298	20.20
Peabody	2108	2	8	4	113	53	178	14.81
Peabody	2108	3	0	0	46	44	90	17.96
Peabody	2109	1	0	0	73	17	90	14.95
Peabody	2109	3	15	12	111	35	173	16.94
Peabody	2109	4	19	26	120	55	220	20.50
Rockport	2201	1	14	14	236	63	327	15.53
Rockport	2201	2	35	26	291	79	431	22.31
Rockport	2201	3	46	40	469	110	665	29.70
Rockport	2201	4	85	61	515	98	759	35.89
Rockport	2201	5	0	8	18	56	82	9.49
Rockport	2201	6	46	23	201	82	352	34.04
Rowley	2701	1	0	30	174	11	215	24.08
Rowley	2701	2	19	15	332	137	503	30.56
Salem	2041.01	1	26	7	125	71	229	24.86
Salem	2041.01	2	32	28	314	72	446	25.75
Salem	2041.01	3	8	0	163	49	220	18.32
Salem	2041.01	4	34	9	158	50	251	18.01
Salem	2041.02	1	0	26	225	58	309	23.48
Salem	2041.02	2	0	0	93	15	108	7.21
Salem	2042	1	7	28	229	131	395	12.23
Salem	2042	2	8	0	213	82	303	25.92
Salem	2042	3	5	6	67	21	99	10.96
Salem	2042	4	0	12	185	179	376	13.82
Salem	2042	5	23	0	76	59	158	7.73
Salem	2043	1	6	0	87	58	151	10.86
Salem	2043	2	0	0	78	31	109	13.39
Salem	2043	3	16	0	81	76	173	10.48
Salem	2044	1	7	0	117	82	206	28.65
Salem	2044	2	6	22	100	7	135	18.29
Salem	2044	3	10	0	158	36	204	22.79
Salem	2044	4	0	8	79	30	117	12.66
Salem	2045	1	0	0	73	30	103	8.73
Salem	2045	2	45	0	191	20	256	11.15
Salem	2045	3	0	6	110	38	154	20.05
Salem	2046	1	0	0	30	15	45	8.33
Salem	2046	2	24	10	49	55	138	12.45
Salem	2046	3	12	0	73	7	92	12.45
Salem	2046	4	14	5	70	8	97	23.43
Salem	2046	5	19	10	185	67	281	14.64
Salem	2046	6	67	52	342	112	573	29.23
Salem	2046	7	0	23	129	58	210	18.31
Salem	2047.01	1	0	6	44	26	76	10.41
Salem	2047.01	2	17	0	122	38	177	15.96
Salem	2047.01	3	24	20	177	171	392	25.76
Salem	2047.02	1	0	0	81	48	129	17.77
Salem	2047.02	2	0	11	53	6	70	10.79

TABLE A.5 CONT.
DISABLED POPULATION: AGES 5 YEARS AND OLDER
NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	5 to 15 years	16 to 20 years	21 to 64 years	65 years and over	Total	Disability Rate
Salem	2047.02	3	7	0	81	80	168	19.13
Salem	2047.02	4	37	0	81	42	160	19.70
Salisbury	2671.01	1	28	50	572	213	863	29.01
Salisbury	2671.02	2	11	10	155	66	242	17.09
Salisbury	2671.02	3	9	0	68	33	110	10.25
Salisbury	2671.02	4	0	0	10	23	33	5.50
Salisbury	2671.02	5	21	18	151	86	276	22.59
Swampscott	2021	1	8	0	79	12	99	12.66
Swampscott	2021	2	7	11	69	25	112	7.69
Swampscott	2021	3	0	0	154	94	248	19.92
Swampscott	2021	4	0	0	98	28	126	14.48
Swampscott	2021	5	8	0	228	74	310	22.51
Swampscott	2021	6	11	10	241	86	348	17.78
Swampscott	2021	7	0	8	207	109	324	25.57
Swampscott	2022	1	13	6	197	68	284	20.23
Swampscott	2022	2	6	15	80	100	201	24.39
Swampscott	2022	3	0	31	10	53	94	19.38
Swampscott	2022	4	0	0	57	58	115	16.89
Swampscott	2022	5	0	0	54	76	130	12.52
Swampscott	2022	6	0	8	96	52	156	14.04
Topsfield	2141	1	0	13	217	67	297	19.89
Topsfield	2141	2	9	18	118	125	270	10.96
Topsfield	2141	3	29	8	244	61	342	13.29
Topsfield	2141	4	0	0	72	35	107	9.12
Wenham	2161	1	16	18	126	88	248	12.84
Wenham	2161	2	0	0	67	71	138	11.11
Wenham	2161	9	52	0	99	78	229	8.25
West Newbury	2631	1	16	7	88	119	230	10.26
West Newbury	2631	2	39	10	198	57	304	14.18
West Newbury	2631	3	12	9	112	10	143	12.21
Wilmington	3311.01	3	6	0	61	61	128	11.10
Wilmington	3311.01	4	5	4	152	32	193	12.72
Wilmington	3311.02	1	7	9	60	71	147	11.71
Wilmington	3311.02	2	0	14	92	40	146	10.53
Wilmington	3311.02	3	12	0	110	90	212	10.84
Wilmington	3311.02	4	0	0	126	34	160	11.95
Wilmington	3312	2	24	32	252	67	375	15.46
Wilmington	3312	3	45	20	231	60	356	15.80
Wilmington	3313	1	0	14	133	55	202	10.51
Wilmington	3313	2	4	43	273	119	439	10.41
Total			4,693	3,833	47,888	25,789	82,203	16.06

**TABLE A.6
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10- \$14.99K	\$15- \$19.99K	\$20- \$24.99K	\$25- \$34.99K	\$35- \$49.99K	\$50- \$74.99K	\$75- \$99.99K	\$100- \$149.99K	\$150K or more	Total Households
Amesbury	2661	1	110	57	60	30	88	226	151	156	130	66	1,074
Amesbury	2661	2	8	0	0	0	38	63	90	28	61	59	347
Amesbury	2661	3	11	5	0	0	13	63	114	59	31	36	332
Amesbury	2661	4	17	9	8	16	37	28	67	19	75	10	286
Amesbury	2661	5	15	24	27	16	42	36	74	88	6	17	345
Amesbury	2662	1	33	7	0	7	27	86	93	122	70	34	479
Amesbury	2662	2	36	16	31	35	53	96	137	93	33	5	535
Amesbury	2662	3	0	0	0	15	15	11	33	27	71	27	199
Amesbury	2663	1	0	8	15	0	6	25	38	54	88	151	385
Amesbury	2663	2	0	0	9	8	40	16	41	92	83	149	438
Amesbury	2663	3	45	31	17	22	54	21	104	170	117	91	672
Amesbury	2664	1	9	0	0	8	33	50	39	66	61	93	359
Amesbury	2664	2	10	8	13	0	16	23	41	23	93	39	266
Amesbury	2664	3	0	16	29	53	25	56	61	62	62	59	423
Amesbury	2664	4	21	24	17	10	28	25	54	36	75	59	349
Andover	2541	1	0	0	0	10	0	32	64	83	112	90	391
Andover	2541	2	0	0	7	0	18	0	30	37	45	83	220
Andover	2541	3	15	0	0	0	6	24	20	13	104	108	290
Andover	2541	4	18	15	7	10	40	22	109	16	22	16	275
Andover	2541	5	15	18	10	0	7	29	37	65	41	52	274
Andover	2542	1	0	11	8	0	0	0	50	47	50	115	281
Andover	2542	2	8	8	0	0	26	21	14	37	124	185	423
Andover	2542	3	6	0	6	30	27	32	75	29	46	79	330
Andover	2543.01	3	38	17	17	0	46	48	102	33	58	45	404
Andover	2543.01	4	8	0	0	8	23	49	56	45	58	93	340
Andover	2543.02	1	8	0	5	11	8	31	61	78	86	117	405
Andover	2543.02	2	61	35	35	52	57	63	157	54	162	180	856
Andover	2543.02	9	40	18	18	45	117	135	66	79	96	127	741
Andover	2544.01	1	45	31	45	28	90	81	122	108	94	117	761
Andover	2544.02	7	57	40	38	24	44	72	111	57	108	24	575
Andover	2544.02	8	63	47	36	25	46	93	178	106	102	103	799
Andover	2544.02	9	0	10	25	0	20	86	123	20	41	86	411
Andover	2544.03	1	12	10	8	36	17	68	89	62	4	0	306
Beverly	2171	1	27	40	11	38	74	76	146	51	85	33	581
Beverly	2171	2	53	8	42	28	119	94	106	10	42	16	518
Beverly	2171	3	27	46	19	35	96	80	58	50	34	16	461
Beverly	2172.01	1	91	71	15	66	102	114	150	95	114	64	882
Beverly	2172.01	2	33	59	32	64	34	133	175	166	131	62	889
Beverly	2172.01	3	71	55	30	79	89	92	100	44	42	19	621
Beverly	2172.01	4	51	25	10	17	79	85	46	18	0	8	339
Beverly	2172.02	1	90	63	62	32	89	123	89	39	7	0	594
Beverly	2172.02	2	28	0	14	21	57	114	64	18	14	0	330
Beverly	2172.02	3	32	8	7	18	39	64	112	73	65	49	467
Beverly	2172.02	4	126	20	13	58	52	73	167	61	34	24	628
Beverly	2173	1	112	29	30	49	63	92	50	14	7	0	446
Beverly	2173	2	94	60	47	26	86	65	43	32	13	0	466
Beverly	2173	3	5	21	33	21	30	79	48	54	26	28	345
Beverly	2173	6	61	32	35	35	93	59	149	67	38	14	583
Beverly	2173	7	15	12	5	11	52	60	56	95	25	0	331
Beverly	2174	1	84	36	28	27	69	93	68	34	40	32	511
Beverly	2174	2	57	36	11	21	89	62	104	69	49	7	505
Beverly	2174	3	41	46	28	20	19	107	109	47	18	16	451
Beverly	2174	4	26	38	58	28	46	110	131	29	33	40	539
Beverly	2175	1	18	0	0	12	18	42	21	52	36	10	209
Beverly	2175	2	21	22	0	9	54	53	65	22	48	21	315
Beverly	2175	3	16	16	0	21	53	60	86	29	20	9	310
Beverly	2175	4	25	5	22	7	64	96	112	29	31	24	415
Beverly	2175	5	20	32	44	34	66	42	110	29	21	0	398
Beverly	2175	6	14	27	16	8	21	74	109	37	8	0	314

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10- \$14.99K	\$15- \$19.99K	\$20- \$24.99K	\$25- \$34.99K	\$35- \$49.99K	\$50- \$74.99K	\$75- \$99.99K	\$100- \$149.99K	\$150K or more	Total Households
Beverly	2176	1	42	18	10	6	46	9	51	38	32	0	252
Beverly	2176	2	11	16	7	0	45	36	47	45	69	33	309
Beverly	2176	3	172	49	65	39	113	66	132	53	29	14	732
Beverly	2176	4	42	45	63	18	148	105	274	221	195	46	1,157
Beverly	2176	9	68	27	31	35	72	33	105	26	36	0	433
Boxford	2131	1	26	36	31	32	39	105	55	51	18	9	402
Boxford	2131	2	73	70	41	31	160	179	250	218	73	31	1,126
Boxford	2131	3	10	8	8	10	47	50	103	32	44	0	312
Boxford	2131	9	5	10	0	20	42	60	127	46	109	76	495
Danvers	2111	1	21	15	8	32	47	34	64	39	103	53	416
Danvers	2111	2	16	33	0	0	36	26	120	81	107	114	533
Danvers	2111	3	8	16	9	5	27	32	59	92	73	84	405
Danvers	2111	4	16	9	9	9	10	55	121	55	65	71	420
Danvers	2112	1	14	16	7	15	0	48	47	72	78	110	407
Danvers	2112	2	36	13	17	60	41	67	104	56	52	117	563
Danvers	2112	3	5	0	7	0	0	10	69	82	81	146	400
Danvers	2112	4	0	0	16	7	60	22	90	108	140	98	541
Danvers	2113	1	46	40	50	56	131	113	240	165	119	68	1,028
Danvers	2113	2	0	9	0	9	9	58	131	112	115	44	487
Danvers	2113	9	13	0	9	22	31	28	97	132	105	63	500
Danvers	2114	1	7	0	9	15	13	39	97	62	144	55	441
Danvers	2114	2	22	10	14	18	40	57	101	111	91	23	487
Danvers	2114	3	28	12	12	37	98	52	180	147	152	47	765
Danvers	2114	4	11	6	15	15	59	99	153	180	130	81	749
Danvers	2114	9	37	31	28	7	87	96	124	33	76	14	533
Essex	2221	1	97	39	41	50	71	160	189	145	189	37	1,018
Essex	2221	2	32	18	11	37	79	130	218	188	118	62	893
Essex	2221	3	53	46	60	95	195	242	202	129	131	49	1,202
Georgetown	2651.01	1	18	63	28	36	92	171	239	178	90	36	951
Georgetown	2651.01	2	0	0	18	17	15	46	75	36	40	10	257
Georgetown	2651.01	3	8	0	0	7	27	0	73	45	30	37	227
Georgetown	2651.01	4	27	9	10	7	47	35	130	102	48	21	436
Georgetown	2651.02	1	27	0	0	20	10	31	37	31	10	25	191
Georgetown	2651.02	2	8	18	9	0	35	95	101	95	103	0	464
Gloucester	2211	1	43	45	44	39	102	127	228	251	225	71	1,175
Gloucester	2211	2	58	29	35	60	67	92	135	93	30	12	611
Gloucester	2211	3	33	10	0	0	28	44	60	65	15	12	267
Gloucester	2213	1	22	58	22	63	81	8	87	71	51	14	477
Gloucester	2213	2	6	0	0	0	22	41	51	24	46	7	197
Gloucester	2213	3	6	13	57	43	59	32	134	85	37	6	472
Gloucester	2213	4	9	6	8	29	54	32	87	38	25	15	303
Gloucester	2214	1	84	39	21	8	57	101	62	54	65	4	495
Gloucester	2214	2	52	23	21	0	63	58	61	41	1	7	327
Gloucester	2214	3	39	27	18	41	65	64	145	69	12	0	480
Gloucester	2214	4	86	78	53	17	56	16	59	13	10	0	388
Gloucester	2215	1	205	174	89	88	165	116	168	36	28	14	1,083
Gloucester	2215	2	58	28	53	6	56	102	105	52	29	22	511
Gloucester	2216	1	132	78	44	32	101	102	179	111	62	11	852
Gloucester	2216	2	13	13	26	7	46	22	75	45	64	0	311
Gloucester	2216	3	0	0	16	33	36	39	82	46	29	45	326
Gloucester	2216	4	24	10	8	59	10	78	108	47	83	23	450
Gloucester	2217	1	14	11	7	16	23	84	88	35	30	19	327
Gloucester	2217	2	9	30	32	46	56	52	81	16	16	0	338
Gloucester	2218	1	55	40	32	56	26	104	91	14	58	39	515
Gloucester	2218	2	10	16	42	42	86	110	148	112	29	44	639
Gloucester	2219	1	46	33	32	47	84	95	128	97	129	30	721
Gloucester	2219	2	53	64	19	58	130	86	275	89	58	29	861
Gloucester	2219	4	31	26	27	49	51	50	159	117	119	26	655
Gloucester	2219	9	4	18	13	27	63	77	156	94	86	47	585

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10-\$14.99K	\$15-\$19.99K	\$20-\$24.99K	\$25-\$34.99K	\$35-\$49.99K	\$50-\$74.99K	\$75-\$99.99K	\$100-\$149.99K	\$150K or more	Total Households
Hamilton	2151	1	26	13	16	35	81	85	203	169	280	120	1,028
Hamilton	2151	2	0	0	24	0	21	65	92	68	43	12	325
Hamilton	2151	3	54	48	43	38	73	167	177	123	86	43	852
Hamilton	2151	4	18	24	14	26	107	124	181	62	67	33	656
Hamilton	2151	5	51	35	37	9	96	92	122	206	116	42	806
Haverhill	2601	1	18	12	19	7	20	56	69	100	117	42	460
Haverhill	2601	2	0	0	16	15	0	28	60	59	93	24	295
Haverhill	2601	3	81	53	11	8	36	74	142	150	136	76	767
Haverhill	2602	1	20	12	26	0	73	69	97	128	157	152	734
Haverhill	2602	2	11	37	17	23	35	74	68	85	118	61	529
Haverhill	2603.01	1	14	0	0	0	21	48	153	70	178	139	623
Haverhill	2603.01	2	0	0	0	0	0	26	92	27	113	175	433
Haverhill	2603.01	3	9	0	30	58	41	77	57	110	252	394	1,028
Haverhill	2603.02	1	19	0	10	0	0	12	65	96	83	191	476
Haverhill	2603.02	2	0	11	10	0	14	27	103	31	196	107	499
Haverhill	2604.01	1	12	8	17	31	44	26	109	80	86	103	516
Haverhill	2604.01	2	44	19	27	7	75	67	108	105	210	182	844
Haverhill	2604.01	3	10	12	12	0	10	0	27	36	81	54	242
Haverhill	2604.02	1	0	16	25	0	18	99	141	168	160	138	765
Haverhill	2604.02	2	32	21	10	7	43	43	108	76	32	39	411
Haverhill	2604.02	3	10	7	38	0	56	108	135	119	88	60	621
Haverhill	2605	1	9	0	0	7	42	34	46	39	18	17	212
Haverhill	2605	2	51	20	28	9	41	68	117	19	93	213	659
Haverhill	2605	3	7	6	19	0	10	34	63	45	97	47	328
Haverhill	2606	1	16	6	25	34	37	35	122	85	120	147	627
Haverhill	2606	2	31	51	26	12	19	5	19	12	57	91	323
Haverhill	2606	3	41	15	15	34	93	95	172	170	182	162	979
Haverhill	2607	1	52	24	26	0	30	117	127	128	76	60	640
Haverhill	2607	2	102	52	27	62	84	228	216	164	157	20	1,112
Haverhill	2608	1	27	10	13	0	0	40	57	13	37	9	206
Haverhill	2608	2	0	17	12	0	29	21	56	69	6	19	229
Haverhill	2609	1	89	50	39	80	98	176	191	74	72	12	881
Haverhill	2609	2	20	21	46	9	38	50	115	71	56	45	471
Haverhill	2609	3	12	28	39	0	7	107	94	47	39	9	382
Haverhill	2609	4	0	15	0	8	34	74	34	21	7	9	202
Haverhill	2610	1	6	7	15	8	26	86	122	67	28	7	372
Haverhill	2610	2	28	16	8	24	64	64	94	81	65	12	456
Haverhill	2610	3	0	0	5	21	15	39	50	66	5	0	201
Haverhill	2611.01	1	93	14	35	27	21	51	82	55	22	0	400
Haverhill	2611.01	2	43	50	30	24	63	78	103	64	29	3	487
Haverhill	2611.01	3	73	25	21	42	18	46	66	23	0	7	321
Haverhill	2611.02	1	47	52	12	9	68	60	64	57	49	0	418
Haverhill	2611.02	2	9	24	6	0	14	67	78	15	30	19	262
Ipswich	2231	1	74	10	71	60	168	133	167	52	31	12	778
Ipswich	2231	2	0	55	53	15	51	114	215	96	70	28	697
Ipswich	2232	1	81	52	77	82	125	176	143	114	38	31	919
Ipswich	2232	2	0	7	16	0	50	109	51	66	57	13	369
Ipswich	2232	3	9	35	24	26	49	48	75	63	42	24	395
Ipswich	2233	1	17	0	9	0	23	71	116	113	43	21	413
Ipswich	2233	2	0	0	7	16	24	41	73	74	48	36	319
Ipswich	2233	3	29	9	9	25	61	62	191	86	61	0	533
Lynnfield	2091	1	64	42	7	16	59	116	182	64	76	29	655
Lynnfield	2091	2	17	17	23	24	51	41	201	133	286	124	917
Lynnfield	2091	3	0	0	0	0	9	31	54	64	61	49	268
Lynnfield	2091	4	18	10	18	8	29	109	60	49	78	70	449
Lynnfield	2091	9	140	95	24	76	7	57	114	85	92	74	764
Lynnfield	2092	1	13	0	0	0	10	10	40	17	44	107	241
Lynnfield	2092	2	49	11	20	0	0	7	84	52	104	115	442
Lynnfield	2092	3	0	0	10	0	12	26	52	45	80	51	276

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10- \$14.99K	\$15- \$19.99K	\$20- \$24.99K	\$25- \$34.99K	\$35- \$49.99K	\$50- \$74.99K	\$75- \$99.99K	\$100- \$149.99K	\$150K or more	Total Households
Lynnfield	2092	4	20	10	56	33	74	44	81	36	29	115	498
Manchester-by-the-Sea	2181	1	67	59	0	49	32	105	113	100	52	99	676
Manchester-by-the-Sea	2181	2	0	0	0	12	12	24	58	30	84	63	283
Manchester-by-the-Sea	2181	3	32	31	68	57	51	177	234	170	149	67	1,036
Manchester-by-the-Sea	2181	4	90	77	52	45	56	86	115	37	42	55	655
Manchester-by-the-Sea	2181	5	12	68	58	38	50	45	79	31	13	15	409
Marblehead	2031	1	37	59	66	51	10	98	141	59	51	30	602
Marblehead	2031	2	5	0	11	5	12	56	45	37	81	54	306
Marblehead	2031	3	9	37	0	59	37	59	101	63	53	46	464
Marblehead	2031	4	17	7	15	45	87	102	185	72	60	18	608
Marblehead	2031	5	34	18	23	21	55	94	172	64	54	65	600
Marblehead	2031	6	40	0	18	8	34	90	149	87	40	32	498
Marblehead	2031	7	23	10	7	6	29	33	49	44	39	31	271
Marblehead	2031	8	21	15	21	53	81	127	132	88	96	46	680
Marblehead	2032	1	33	6	26	8	34	57	139	57	37	50	447
Marblehead	2032	3	30	27	35	7	42	118	112	116	108	41	636
Marblehead	2032	4	84	13	36	33	67	93	76	26	21	6	455
Marblehead	2032	5	136	16	43	32	130	175	146	64	10	11	763
Marblehead	2032	6	9	0	0	7	0	13	6	14	0	0	49
Marblehead	2033	1	16	5	0	15	32	39	42	0	9	11	169
Marblehead	2033	2	220	124	52	60	122	93	94	65	24	0	854
Marblehead	2033	3	151	88	23	30	106	102	153	70	18	17	758
Marblehead	2033	4	60	21	15	7	5	0	23	7	6	0	144
Marblehead	2033	5	14	25	7	5	38	77	114	51	9	10	350
Marblehead	2033	6	67	37	12	29	44	64	74	42	25	9	403
Merrimac	2621	1	94	14	17	8	34	11	25	5	0	0	208
Merrimac	2621	2	32	21	27	50	70	142	100	34	34	7	517
Merrimac	2621	9	74	69	61	38	90	134	199	74	24	6	769
Methuen	2521.01	1	20	13	13	22	46	90	86	73	64	0	427
Methuen	2521.01	2	6	7	7	5	14	17	37	37	14	13	157
Methuen	2521.01	3	0	35	8	88	72	194	135	92	27	9	660
Methuen	2521.02	4	27	30	8	8	78	122	79	65	100	36	553
Methuen	2521.02	5	72	23	34	0	37	77	279	183	84	79	868
Methuen	2521.02	9	6	21	7	23	57	70	218	123	137	82	744
Methuen	2522.01	1	6	25	35	14	26	27	95	77	56	16	377
Methuen	2522.01	2	60	35	34	17	11	121	122	93	56	38	587
Methuen	2522.02	1	27	6	20	7	30	33	101	12	45	69	350
Methuen	2522.02	2	38	25	44	41	69	159	208	124	164	59	931
Methuen	2523	1	56	56	39	29	59	67	70	52	148	119	695
Methuen	2523	2	69	6	44	17	69	96	88	56	64	40	549
Methuen	2523	3	109	86	52	35	61	67	160	83	27	11	691
Methuen	2523	4	58	0	14	6	54	79	69	28	52	30	390
Methuen	2523	5	30	25	20	16	38	87	119	123	112	139	709
Methuen	2523	6	76	8	30	35	134	124	224	88	150	106	975
Methuen	2524	1	8	9	10	0	8	71	76	80	61	25	348
Methuen	2524	2	63	28	21	33	97	92	90	78	23	21	546
Methuen	2524	3	14	0	26	14	20	48	88	14	16	0	240
Methuen	2524	4	74	68	41	27	49	156	132	83	30	23	683
Methuen	2525.01	1	20	5	11	37	26	72	138	62	105	32	508
Methuen	2525.01	2	9	18	20	11	35	64	62	48	36	9	312
Methuen	2525.01	3	18	18	0	9	23	30	41	126	110	31	406
Methuen	2525.02	1	30	46	0	23	60	53	61	59	59	15	406
Methuen	2525.02	5	29	44	55	57	117	94	122	109	85	24	736
Methuen	2525.02	6	15	19	0	18	46	82	139	215	62	23	619
Methuen	2526.01	2	58	7	0	10	26	40	89	64	87	32	413
Methuen	2526.01	3	27	14	0	6	32	54	57	13	25	17	245

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10-\$14.99K	\$15-\$19.99K	\$20-\$24.99K	\$25-\$34.99K	\$35-\$49.99K	\$50-\$74.99K	\$75-\$99.99K	\$100-\$149.99K	\$150K or more	Total Households
Methuen	2526.01	4	52	34	48	19	38	34	91	42	17	0	375
Methuen	2526.01	5	40	15	6	18	27	70	122	57	33	7	395
Methuen	2526.02	1	50	33	26	10	60	79	89	24	34	10	415
Methuen	2526.02	9	216	72	60	24	89	100	170	66	10	17	824
Methuen	2526.03	1	17	8	24	8	35	44	20	53	28	0	237
Middleton	2121	1	12	46	19	28	71	68	117	29	8	6	404
Middleton	2121	2	122	52	46	42	57	72	33	31	25	7	487
Middleton	2121	3	62	26	18	20	37	55	36	13	7	10	284
Middleton	2121	9	46	0	0	28	16	22	33	13	7	0	165
Newburyport	2681	3	7	45	30	36	49	172	149	76	37	12	613
Newburyport	2681	4	29	19	38	22	30	59	90	51	39	5	382
Newburyport	2682	1	40	39	27	28	34	48	72	58	35	4	385
Newburyport	2682	2	29	31	22	34	81	122	178	108	40	13	658
Newburyport	2682	3	26	6	23	14	63	59	98	59	67	29	444
Newburyport	2682	4	77	18	25	34	31	86	185	97	71	16	640
Newburyport	2683	1	47	38	118	37	105	141	85	115	49	0	735
Newburyport	2683	2	17	12	13	9	28	72	100	46	39	29	365
Newburyport	2683	3	56	51	17	22	50	98	125	80	33	33	565
Newburyport	2683	4	50	15	35	27	155	126	191	139	87	6	831
Newburyport	2684	1	12	11	16	0	55	103	171	106	90	17	581
Newburyport	2684	2	32	24	20	17	19	77	175	90	94	46	594
Newburyport	2684	3	31	13	29	62	76	171	262	160	140	90	1,034
Newburyport	2684	4	27	48	31	23	39	76	77	62	51	7	441
North Andover	2531	1	12	11	36	7	21	18	57	9	44	0	215
North Andover	2531	2	0	9	0	18	38	50	58	34	40	36	283
North Andover	2531	3	97	44	38	32	68	129	144	87	92	13	744
North Andover	2531	4	15	33	7	26	44	57	23	39	29	12	285
North Andover	2531	5	31	21	25	0	22	41	93	80	54	15	382
North Andover	2531	6	93	57	56	21	114	117	179	119	59	22	837
North Andover	2532.01	1	12	6	0	10	21	52	46	76	72	49	344
North Andover	2532.01	2	0	0	25	0	22	41	33	0	26	0	147
North Andover	2532.02	3	95	79	87	77	169	186	312	138	98	71	1,312
North Andover	2532.02	4	19	24	27	44	66	120	174	116	203	123	916
North Andover	2532.02	5	0	0	6	0	26	14	50	71	95	69	331
North Andover	2532.03	1	12	23	0	5	15	47	45	110	119	82	458
North Andover	2532.03	6	12	6	11	25	41	16	54	73	119	126	483
North Andover	2532.03	9	0	0	25	0	0	25	41	36	148	88	363
North Andover	2532.04	1	15	29	0	8	17	23	99	104	313	303	911
North Andover	2532.04	2	0	10	21	0	25	18	53	82	168	356	733
North Andover	2532.05	1	8	0	9	22	0	34	24	98	199	120	514
North Andover	2532.05	2	0	0	11	9	36	49	77	96	106	51	435
North Reading	3301	1	39	43	7	8	37	112	53	106	65	52	522
North Reading	3301	2	80	59	38	39	29	46	100	139	106	102	738
North Reading	3301	3	11	8	9	38	25	89	49	14	40	64	347
North Reading	3301	9	15	7	0	8	6	70	40	50	61	19	276
North Reading	3302	1	77	107	21	30	32	66	84	49	101	137	704
North Reading	3302	2	54	21	15	16	44	90	48	70	100	67	525
North Reading	3302	3	92	85	57	45	34	107	113	63	92	15	703
Peabody	2101	1	0	21	0	5	19	20	57	94	109	216	541
Peabody	2101	2	14	15	0	16	29	34	92	136	155	230	721
Peabody	2101	3	41	4	0	7	19	59	97	142	108	310	787
Peabody	2101	4	0	0	0	20	8	40	62	43	108	61	342
Peabody	2102	1	13	27	17	14	25	67	84	30	96	94	467
Peabody	2102	2	31	0	0	17	17	78	135	159	231	246	914
Peabody	2102	3	0	0	0	16	7	53	32	48	100	231	487
Peabody	2103	1	93	0	12	18	27	56	110	111	98	85	610
Peabody	2103	2	21	15	19	35	37	52	146	61	206	413	1,005
Peabody	2103	3	59	0	21	17	44	121	174	202	284	300	1,222
Peabody	2104	1	107	75	30	54	69	87	148	39	9	10	628

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10- \$14.99K	\$15- \$19.99K	\$20- \$24.99K	\$25- \$34.99K	\$35- \$49.99K	\$50- \$74.99K	\$75- \$99.99K	\$100- \$149.99K	\$150K or more	Total Households
Peabody	2104	2	174	73	86	74	27	46	67	14	10	0	571
Peabody	2104	3	106	72	40	54	48	62	69	31	18	5	505
Peabody	2104	4	67	15	20	43	56	116	147	104	11	38	617
Peabody	2105	1	240	208	56	87	116	80	87	71	14	4	963
Peabody	2105	2	38	50	60	83	55	71	132	115	72	58	734
Peabody	2105	3	40	60	33	39	59	104	165	110	79	15	704
Peabody	2105	4	7	0	37	6	25	46	95	77	84	41	418
Peabody	2106	1	6	0	0	12	25	64	89	42	24	16	278
Peabody	2106	2	122	67	15	19	47	66	139	204	117	51	847
Peabody	2106	3	8	27	75	9	82	155	201	72	140	56	825
Peabody	2106	4	18	13	13	35	44	104	107	73	62	25	494
Peabody	2107	1	0	0	8	5	17	0	34	39	30	18	151
Peabody	2107	2	28	23	50	47	89	157	377	177	121	27	1,096
Peabody	2107	3	29	8	0	23	37	122	188	174	171	42	794
Peabody	2107	4	0	27	7	34	32	73	99	79	15	17	383
Peabody	2108	1	50	5	4	21	19	80	149	147	71	26	572
Peabody	2108	2	50	11	13	14	37	65	93	77	75	36	471
Peabody	2108	3	17	6	0	10	7	39	57	35	54	21	246
Peabody	2109	1	14	19	0	12	28	62	66	50	15	0	266
Peabody	2109	3	6	17	0	66	36	83	138	52	18	0	416
Peabody	2109	4	29	13	33	41	50	86	85	62	0	11	410
Rockport	2201	1	33	30	46	26	84	139	241	184	68	7	858
Rockport	2201	2	64	24	60	39	136	163	183	83	59	10	821
Rockport	2201	3	92	68	74	59	121	134	202	106	26	15	897
Rockport	2201	4	138	83	65	82	136	137	151	47	34	0	873
Rockport	2201	5	6	18	0	5	6	116	78	43	45	8	325
Rockport	2201	6	23	14	20	22	72	91	51	31	48	7	379
Rowley	2701	1	47	33	47	24	60	70	84	15	13	13	406
Rowley	2701	2	149	77	64	31	25	134	230	48	100	0	858
Salem	2041.01	1	56	31	6	16	39	66	112	37	34	6	403
Salem	2041.01	2	46	35	51	37	90	164	141	97	59	10	730
Salem	2041.01	3	11	44	35	26	60	67	178	113	33	9	576
Salem	2041.01	4	0	36	0	22	75	58	162	54	83	33	523
Salem	2041.02	1	10	0	17	37	50	43	64	81	91	15	408
Salem	2041.02	2	0	0	6	6	49	69	136	123	171	30	590
Salem	2042	1	63	85	24	44	179	197	312	204	215	67	1,390
Salem	2042	2	45	23	32	20	48	142	154	64	38	7	573
Salem	2042	3	21	0	0	5	19	80	54	58	63	20	320
Salem	2042	4	87	48	42	76	117	223	190	112	192	66	1,153
Salem	2042	5	11	8	39	42	34	134	181	184	71	53	757
Salem	2043	1	26	22	13	12	11	31	114	75	87	139	530
Salem	2043	2	19	4	0	0	32	25	33	48	87	55	303
Salem	2043	3	15	13	12	4	25	51	79	113	162	94	568
Salem	2044	1	43	96	16	12	28	25	53	53	21	27	374
Salem	2044	2	11	0	15	6	9	45	60	49	51	36	282
Salem	2044	3	8	21	16	17	28	66	86	32	31	23	328
Salem	2044	4	24	0	17	9	30	20	64	89	71	20	344
Salem	2045	1	0	34	7	0	11	52	70	136	79	64	453
Salem	2045	2	8	28	8	13	7	53	110	222	234	108	791
Salem	2045	3	10	0	22	13	38	68	83	45	60	0	339
Salem	2046	1	15	18	15	3	15	26	47	38	48	59	284
Salem	2046	2	16	0	12	20	38	38	64	78	77	16	359
Salem	2046	3	0	8	12	11	29	42	52	81	36	10	281
Salem	2046	4	12	19	24	20	19	33	43	12	0	5	187
Salem	2046	5	52	42	53	76	90	155	186	104	50	24	832
Salem	2046	6	65	60	86	36	134	92	185	110	67	8	843
Salem	2046	7	18	9	35	17	28	32	101	99	111	18	468
Salem	2047.01	1	9	14	0	0	60	36	89	64	58	27	357
Salem	2047.01	2	22	30	20	44	30	54	113	51	71	16	451

**TABLE A.6 CONT.
HOUSEHOLDS BY INCOME RANGE**

NORTH SHORE HOME CONSORTIUM, BY BLOCK GROUP, 2000 CENSUS: SF3

City	Census Tract	Block Group	Less than \$10K	\$10- \$14.99K	\$15- \$19.99K	\$20- \$24.99K	\$25- \$34.99K	\$35- \$49.99K	\$50- \$74.99K	\$75- \$99.99K	\$100- \$149.99K	\$150K or more	Total Households
Salem	2047.01	3	135	60	21	49	66	52	157	74	56	14	684
Salem	2047.02	1	28	13	21	12	25	38	76	63	37	8	321
Salem	2047.02	2	5	0	10	0	10	42	49	74	29	18	237
Salem	2047.02	3	31	19	21	44	50	50	151	46	33	7	452
Salem	2047.02	4	13	19	15	33	49	57	70	49	25	0	330
Salisbury	2671.01	1	151	116	28	86	134	223	320	191	96	28	1,373
Salisbury	2671.02	2	19	14	55	24	80	136	130	85	40	19	602
Salisbury	2671.02	3	8	33	0	15	49	36	107	53	66	17	384
Salisbury	2671.02	4	0	0	9	0	0	29	78	51	19	14	200
Salisbury	2671.02	5	35	24	49	38	84	92	107	66	32	0	527
Swampscott	2021	1	0	8	0	9	7	26	55	51	93	40	289
Swampscott	2021	2	7	0	5	6	33	38	95	87	136	45	452
Swampscott	2021	3	23	7	16	55	19	90	114	125	100	54	603
Swampscott	2021	4	16	0	36	8	24	72	46	73	52	57	384
Swampscott	2021	5	38	15	13	49	45	151	108	73	63	65	620
Swampscott	2021	6	35	59	55	15	76	97	159	99	121	94	810
Swampscott	2021	7	77	74	18	27	92	90	163	170	72	37	820
Swampscott	2022	1	35	7	44	29	84	138	136	112	91	47	723
Swampscott	2022	2	74	27	27	28	47	20	52	63	36	44	418
Swampscott	2022	3	18	16	0	16	6	40	41	32	20	25	214
Swampscott	2022	4	19	9	18	39	37	78	31	66	50	11	358
Swampscott	2022	5	0	16	24	22	16	151	61	59	98	45	492
Swampscott	2022	6	62	38	25	57	87	123	105	60	38	38	633
Topsfield	2141	1	0	23	0	7	75	142	167	102	66	84	666
Topsfield	2141	2	58	46	16	66	56	111	208	143	174	68	946
Topsfield	2141	3	21	23	53	25	67	159	235	188	134	109	1,014
Topsfield	2141	4	15	0	0	9	16	31	78	118	57	50	374
Wenham	2161	1	0	24	45	34	47	68	120	135	136	133	742
Wenham	2161	2	18	19	9	18	26	6	89	103	94	74	456
Wenham	2161	9	8	18	18	41	62	106	160	191	245	162	1,011
West Newbury	2631	1	21	7	34	52	64	135	142	176	195	112	938
West Newbury	2631	2	16	21	15	20	43	139	196	171	114	76	811
West Newbury	2631	3	27	0	0	19	48	91	132	60	52	23	452
Wilmington	3311.01	3	15	8	0	18	17	83	137	84	54	36	452
Wilmington	3311.01	4	0	26	5	16	53	56	107	103	172	68	606
Wilmington	3311.02	1	6	28	0	5	28	90	91	153	53	6	460
Wilmington	3311.02	2	8	16	6	10	41	132	53	142	81	42	531
Wilmington	3311.02	3	30	42	25	40	50	60	211	141	119	20	738
Wilmington	3311.02	4	24	6	9	9	38	45	79	100	80	38	428
Wilmington	3312	2	22	27	29	26	27	94	214	197	143	32	811
Wilmington	3312	3	24	43	14	18	43	98	228	200	116	28	812
Wilmington	3313	1	0	7	0	9	37	111	190	171	141	32	698
Wilmington	3313	2	51	101	21	12	75	167	340	295	321	107	1,490
Total			13,968	9,874	8,715	9,408	19,119	29,494	43,152	30,960	29,126	19,270	213,086

TABLE A.7
NORTH SHORE HOME CONSORTIUM DISPOSITION OF VACANT HOUSING UNITS
2000 CENSUS: SF1

City or Town	For rent	For sale only	Rented or Sold; not occupied	For recreational, seasonal, or occasional use	For migrant workers	Other vacant	Total
Amesbury	86	30	33	53	.	41	243
Andover	69	36	35	77	.	68	285
Beverly	201	42	48	125	.	109	525
Boxford	3	9	10	8	.	12	42
Danvers	52	31	23	50	.	51	207
Essex	13	9	10	89	.	12	133
Georgetown	14	7	2	15	.	12	50
Gloucester	142	63	54	961	1	145	1,366
Hamilton	7	10	11	108	.	21	157
Haverhill	289	68	79	62	2	261	761
Ipswich	40	34	21	187	.	29	311
Lynnfield	5	19	13	24	.	26	87
Manchester-by-the-Sea	9	19	13	108	.	10	159
Marblehead	64	27	31	160	.	83	365
Merrimac	13	10	13	14	.	12	62
Methuen	133	41	21	37	.	121	353
Middleton	9	8	4	10	.	11	42
Newburyport	102	29	18	180	.	49	378
North Andover	63	28	32	47	.	49	219
Peabody	94	42	47	60	.	74	317
Rockport	55	12	37	550	.	58	712
Rowley	11	1	2	19	.	13	46
Salem	233	80	66	72	.	232	683
Salisbury	310	18	15	700	.	31	1,074
Swampscott	32	14	5	126	.	34	211
Topsfield	4	7	3	18	.	13	45
Wenham	5	4	5	10	.	11	35
West Newbury	6	6	4	9	.	6	31
North Reading	6	16	6	31	.	16	75
Wilmington	41	15	19	17	.	39	131
Total	2,111	735	680	3,927	3	1,649	9,105

TABLE A.8
NORTH SHORE HOME CONSORTIUM INCOME SPENT ON HOUSING:
SPECIFIED RENTER-OCCUPIED UNITS⁴⁷
2000 CENSUS: SF3

City or Town	Less than 29.9 percent	30 to 49.9 percent	50 percent or more	Not computed	Total
Amesbury	1,264	489	318	107	2,178
Andover	1,429	360	355	270	2,414
Beverly	3,903	1,136	920	325	6,284
Boxford	36	0	7	23	66
Danvers	1,374	370	275	152	2,171
Essex	256	55	54	22	387
Georgetown	193	58	65	34	350
Gloucester	3,006	939	831	285	5,061
Hamilton	265	51	63	101	480
Haverhill	5,276	1,715	1,614	496	9,101
Ipswich	807	267	213	120	1,407
Lynnfield	130	48	19	41	238
Manchester-by-the-Sea	327	161	116	28	632
Marblehead	1,243	440	264	160	2,107
Merrimac	246	49	52	18	365
Methuen	2,738	798	707	388	4,631
Middleton	184	73	37	37	331
Newburyport	1,676	460	262	108	2,506
North Andover	1,694	387	416	129	2,626
Peabody	3,119	1,128	759	337	5,343
Rockport	693	289	188	76	1,246
Rowley	250	66	73	60	449
Salem	5,259	1,780	1,378	481	8,898
Salisbury	615	158	151	37	961
Swampscott	805	268	191	77	1,341
Topsfield	163	36	12	21	232
Wenham	88	66	5	24	183
West Newbury	64	5	14	15	98
North Reading	319	44	61	34	458
Wilmington	383	130	83	73	669
Total	37,805	11,826	9,503	4,079	63,213

⁴⁷ Specified renter-occupied units include all renter-occupied units except 1-unit attached or detached houses on 10 acres or more.

TABLE A.9
NORTH SHORE HOME CONSORTIUM INCOME SPENT ON HOUSING:
SPECIFIED OWNER-OCCUPIED UNITS WITH A MORTGAGE⁴⁸
2000 CENSUS: SF3

City or Town	Less than 29.9 percent	30 to 49.9 percent	50 percent or more	Not computed	Total
Amesbury	1,852	501	194	4	2,551
Andover	4,518	927	489	17	5,951
Beverly	3,841	994	583	12	5,430
Boxford	1,362	293	106	9	1,770
Danvers	2,945	991	350	.	4,286
Essex	278	96	118	5	497
Georgetown	1,278	339	109	.	1,726
Gloucester	2,591	866	486	20	3,963
Hamilton	1,052	282	93	.	1,427
Haverhill	6,429	1,384	640	27	8,480
Ipswich	1,504	430	266	18	2,218
Lynnfield	1,741	386	267	5	2,399
Manchester-by-the-Sea	702	157	61	9	929
Marblehead	3,025	691	324	40	4,080
Merrimac	912	169	121	.	1,202
Methuen	5,239	1,262	564	48	7,113
Middleton	1,034	175	155	.	1,364
Newburyport	2,059	682	233	.	2,974
North Andover	3,352	720	317	9	4,398
Peabody	5,765	1,166	590	14	7,535
Rockport	730	311	134	.	1,175
Rowley	738	210	87	.	1,035
Salem	2,513	664	339	27	3,543
Salisbury	757	205	130	.	1,092
Swampscott	1,719	422	219	.	2,360
Topsfield	1,011	203	48	.	1,262
Wenham	475	101	90	.	666
West Newbury	644	155	52	.	851
North Reading	2,098	569	266	.	2,933
Wilmington	3,430	878	368	.	4,676
Total	65,594	16,229	7,799	264	89,886

⁴⁸ Specified owner-occupied units are owner-occupied, one-family attached and detached houses on less than 10 acres without a business or medical office on the property.

TABLE A.10
NORTH SHORE HOME CONSORTIUM INCOME SPENT ON HOUSING:
SPECIFIED OWNER-OCCUPIED UNITS WITHOUT A MORTGAGE⁴⁹
2000 CENSUS: SF3

City or Town	Less than 29.9 percent	30 to 49.9 percent	50 percent or more	Not computed	Total
Amesbury	537	92	52	19	700
Andover	1,675	131	152	13	1,971
Beverly	2,032	172	113	17	2,334
Boxford	429	19	11	9	468
Danvers	1,633	131	99	24	1,887
Essex	179	18	6	.	203
Georgetown	322	23	8	.	353
Gloucester	1,501	163	140	32	1,836
Hamilton	468	63	27	8	566
Haverhill	2,053	199	138	35	2,425
Ipswich	842	113	64	.	1,019
Lynnfield	989	77	77	.	1,143
Manchester-by-the-Sea	369	19	19	.	407
Marblehead	1,381	130	80	.	1,591
Merrimac	230	25	.	.	255
Methuen	2,354	333	204	73	2,964
Middleton	316	30	19	.	365
Newburyport	954	108	32	.	1,094
North Andover	1,005	150	96	15	1,266
Peabody	2,910	209	145	52	3,316
Rockport	591	83	18	9	701
Rowley	192	15	23	.	230
Salem	1,382	171	115	25	1,693
Salisbury	406	24	9	.	439
Swampscott	938	51	69	31	1,089
Topsfield	335	46	29	.	410
Wenham	239	28	.	5	272
West Newbury	231	44	28	8	311
North Reading	785	71	73	.	929
Wilmington	1,212	129	90	6	1,437
Total	28,490	2,867	1,936	381	33,674

⁴⁹ Specified owner-occupied units are owner-occupied, one-family attached and detached houses on less than 10 acres without a business or medical office on the property.

TABLE A.11
HOUSEHOLD INCOME AND MEDIAN SINGLE FAMILY HOME PRICES
NORTH SHORE HOME CONSORTIUM

City/Town	Median Household Income					Median Single-family Home Price					% Change 1998-2006	
	2001	2003	2004	2005	1998	2001	2002	2003	2004	2005		2006 ⁵⁰
Amesbury	57,226	58,404	59,572	60,764	156,500	242,750	275,000	300,000	322,650	335,000	316,500	102.24
Andover	96,671	98,660	100,633	102,646	290,000	417,250	445,000	485,000	525,000	576,000	495,500	70.86
Beverly	59,517	60,742	61,957	63,196	189,900	283,000	316,000	345,000	375,000	381,950	370,000	94.84
Boxford	124,816	127,385	129,933	132,532	339,000	480,000	543,000	583,600	636,500	650,000	555,000	63.72
Danvers	64,804	66,138	67,460	68,810	196,750	285,000	308,000	354,950	372,250	390,500	372,500	89.33
Essex	65,658	67,010	68,350	69,717	190,000	273,500	363,200	354,500	495,000	425,000	516,000	171.58
Georgetown	84,077	85,807	87,523	89,274	210,000	319,000	332,250	346,000	413,500	400,000	420,000	100.00
Gloucester	52,614	53,696	54,770	55,866	160,500	249,000	295,000	330,000	365,000	380,000	352,000	119.31
Hamilton	79,380	81,014	82,634	84,287	260,000	330,000	378,750	469,500	479,500	510,000	462,500	77.88
Haverhill	54,941	56,072	57,193	58,337	138,950	214,000	245,000	272,500	299,900	314,000	283,095	103.74
Ipswich	63,156	64,456	65,745	67,060	235,000	325,000	344,000	407,000	450,000	477,000	440,000	87.23
Lynnfield	88,890	90,720	92,534	94,385	286,500	375,000	439,500	466,250	494,900	557,000	492,500	71.90
Manchester	80,997	82,665	84,318	86,004	340,000	528,500	494,000	615,000	561,000	670,000	690,000	102.94
Marblehead	81,550	83,228	84,893	86,591	289,500	399,000	444,500	480,000	527,250	570,000	573,500	98.10
Merrimac	64,708	66,040	67,361	68,708	184,000	234,900	292,500	300,500	405,000	362,500	320,000	73.91
Methuen	54,714	55,840	56,957	58,096	138,000	202,000	234,000	269,900	279,000	320,000	315,000	128.26
Middleton	89,738	91,585	93,417	95,285	256,000	342,000	417,450	450,000	445,250	530,000	400,000	56.25
Newburyport	64,559	65,888	67,206	68,550	205,000	328,500	345,000	375,000	430,000	450,000	445,000	117.07
N. Andover	80,183	81,833	83,470	85,139	280,950	384,500	413,500	445,000	500,000	550,000	550,000	95.76
N. Reading	84,851	86,597	88,329	90,096	207,000	300,000	345,000	375,500	416,250	440,000	375,000	81.16
Peabody	60,449	61,693	62,927	64,186	186,000	265,750	308,500	328,750	358,000	372,000	350,000	88.17
Rockport	55,854	57,003	58,143	59,306	219,000	314,900	375,000	390,000	440,000	416,450	400,000	82.65
Rowley	68,498	69,908	71,306	72,733	227,000	294,950	313,500	412,500	354,000	432,500	518,000	128.19
Salem	48,546	49,546	50,537	51,547	153,700	228,500	276,750	305,000	319,500	345,000	320,000	108.20
Salisbury	54,364	55,483	56,593	57,725	122,250	180,000	230,000	274,000	310,000	322,500	322,250	163.60
Swampscott	78,376	79,989	81,589	83,220	235,000	324,000	385,400	404,000	439,000	500,000	455,000	93.62
Topsfield	106,314	108,502	110,672	112,886	325,000	411,000	482,500	527,000	532,250	530,000	475,000	46.15
Wenham	99,803	101,857	103,894	105,972	302,500	533,000	530,000	565,000	542,300	473,900	661,500	118.68
W. Newbury	102,343	104,449	106,538	108,669	272,450	392,450	405,000	465,000	462,000	482,500	660,000	142.25
Wilmington	77,894	79,497	81,087	82,709	186,000	274,500	301,000	344,000	355,000	374,750	395,000	112.37

Source: Citizens Housing and Planning Association. *The Greater Boston Housing Report Card 2005-06, 2004, 2003, and 2002.*

⁵⁰ These data represent median prices over January through May of 2006.

APPENDIX B. HMDA DATA

TABLE B.1
HOME MORTGAGE DISCLOSURE ACT DATA
ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Action Taken	2000	2001	2002	2003	2004	2005	Total
American Indian or Alaskan Native	Loan Originated	30	14	18	9	27	19	117
	Application Denied	5	5	3	1	13	2	29
	Denial Rate %	14.3%	26.3%	14.3%	10.0%	32.5%	9.5%	19.9%
Asian or Pacific Islander	Loan Originated	190	187	214	161	325	330	1407
	Application Denied	19	5	18	13	51	27	133
	Denial Rate %	9.1%	2.6%	7.8%	7.5%	13.6%	7.6%	8.6%
Black	Loan Originated	62	69	59	68	162	226	646
	Application Denied	11	19	11	26	31	65	163
	Denial Rate %	15.1%	21.6%	15.7%	27.7%	16.1%	22.3%	20.1%
Hispanic race	Loan Originated	215	217	258	292	.	.	982
	Application Denied	47	47	38	96	.	.	228
	Denial Rate %	17.9%	17.8%	12.8%	24.7%	.	.	18.8%
White	Loan Originated	7,592	7,411	6,848	7,453	9,042	9,149	47,495
	Application Denied	756	607	502	699	1,008	1,213	4,785
	Denial Rate %	9.1%	7.6%	6.8%	8.6%	10.0%	11.7%	9.2%
Other	Loan Originated	67	72	62	46	.	.	247
	Application Denied	13	10	12	10	.	.	45
	Denial Rate %	16.3%	12.2%	16.2%	17.9%	.	.	15.4%
Not Provided by Applicant	Loan Originated	639	920	989	982	1,185	906	5,621
	Application Denied	129	146	153	149	190	223	990
	Denial Rate %	16.8%	13.7%	13.4%	13.2%	13.8%	19.8%	15.0%
Not Applicable	Loan Originated	2	7	3	6	36	3	57
	Application Denied	.	3	1	.	10	.	14
	Denial Rate %	.	30.0%	25.0%	.	21.7%	.	19.7%
Total	Loan Originated	8,797	8,897	8,451	9,017	10,777	10,633	56,572
	Application Denied	980	842	738	994	1,303	1,530	6,387
	Denial Rate %	10.0%	8.6%	8.0%	9.9%	10.8%	12.6%	10.1%

TABLE B.1a
HOME MORTGAGE DISCLOSURE ACT DATA
ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY ETHNICITY
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Ethnicity	Action Taken	2000	2001	2002	2003	2004	2005	Total
Hispanic	Loan Originated	498	672	1,170
	Application Denied	115	184	299
	Denial Rate %	18.8%	21.5%	20.4%

TABLE B.2
HOME MORTGAGE DISCLOSURE ACT DATA
ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY GENDER
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Gender	Action Taken	2000	2001	2002	2003	2004	2005	Total
Male	Loan Originated	6,187	5,973	5,666	5,961	6,928	6,868	37,583
	Application Denied	610	495	433	622	776	957	3,893
	Denial Rate %	9.0%	7.7%	7.1%	9.4%	10.1%	12.2%	9.4%
Female	Loan Originated	2,166	2,266	2,121	2,497	3,257	3,372	15,679
	Application Denied	278	242	199	287	428	489	1,923
	Denial Rate %	11.4%	9.6%	8.6%	10.3%	11.6%	12.7%	10.9%
Not Provided by Applicant	Loan Originated	442	653	660	556	588	391	3,290
	Application Denied	92	104	105	85	99	84	569
	Denial Rate %	17.2%	13.7%	13.7%	13.3%	14.4%	17.7%	14.7%
Not Applicable	Loan Originated	2	5	4	3	4	2	20
	Application Denied		1	1				2
	Denial Rate %		16.7%	20.0%				9.1%
Total	Loan Originated	8,797	8,897	8,451	9,017	10,777	10,633	56,572
	Application Denied	980	842	738	994	1,303	1,530	6,387
	Denial Rate %	10.0%	8.6%	8.0%	9.9%	10.8%	12.6%	10.1%

TABLE B.3
HOME MORTGAGE DISCLOSURE ACT DATA
DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY DENIAL REASON
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Denial Reason	2000	2001	2002	2003	2004	2005	Total
Debt-to-income Ratio	202	175	155	195	208	208	1,143
Employment History	16	16	18	21	24	22	117
Credit History	244	190	161	158	182	222	1,157
Collateral	77	61	72	75	126	144	555
Insufficient Cash	30	34	29	44	46	31	214
Unverifiable Information	21	20	22	69	86	115	333
Credit Application Incomplete	86	81	56	128	152	180	683
Mortgage Insurance Denied	4	2	3	1	1		11
Other	111	114	116	152	231	276	1,000
Missing	189	149	106	151	247	332	1,174
Total	980	842	738	994	1,303	1,530	6,387

TABLE B.4
HOME MORTGAGE DISCLOSURE ACT DATA
HOME LOAN APPLICATIONS: OWNER OCCUPIED HOMES BY LENDER TYPE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Application Action	2000	2001	2002	2003	2004	2005	Total
Prime Lenders							
Loan Originated	8,449	8,566	8,120	8,419	9,649	8,966	52,169
Application Denied	757	630	582	711	888	945	4,513
Denial Rate	8.2%	6.9%	6.7%	7.8%	8.4%	9.5%	8.0%
Subprime Lenders							
Loan Originated	338	325	329	597	1,128	1,667	4,384
Application Denied	174	154	135	270	415	585	1,733
Denial Rate	34.0%	32.2%	29.1%	31.1%	26.9%	26.0%	28.3%
Manufactured Home Lenders							
Loan Originated	10	6	2	1			19
Application Denied	49	58	21	13			141
Denial Rate	83.1%	90.6%	91.3%	92.9%			88.1%

TABLE B.5
HOME MORTGAGE DISCLOSURE ACT DATA
PRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Action Taken	2000	2001	2002	2003	2004	2005	Total
American Indian or Alaskan Native	Loan Originated	29	13	17	7	20	12	98
	Application Denied	4	3	3	1	3	2	16
	Denial Rate %	12.1%	18.8%	15.0%	12.5%	13.0%	14.3%	14.0%
Asian or Pacific Islander	Loan Originated	185	182	211	155	294	292	1319
	Application Denied	16	5	17	12	36	19	105
	Denial Rate %	8.0%	2.7%	7.5%	7.2%	10.9%	6.1%	7.4%
Black	Loan Originated	54	64	46	50	98	121	433
	Application Denied	6	15	8	16	15	28	88
	Denial Rate %	10.0%	19.0%	14.8%	24.2%	13.3%	18.8%	16.9%
Hispanic race	Loan Originated	200	201	227	230	.	.	858
	Application Denied	38	34	29	52	.	.	153
	Denial Rate %	16.0%	14.5%	11.3%	18.4%	.	.	15.1%
White	Loan Originated	7,318	7,162	6,606	7,037	8,152	7,751	44,026
	Application Denied	594	470	410	536	718	789	3,517
	Denial Rate %	7.5%	6.2%	5.8%	7.1%	8.1%	9.2%	7.4%
Other	Loan Originated	61	69	56	40	.	.	226
	Application Denied	8	10	9	6	.	.	33
	Denial Rate %	11.6%	12.7%	13.8%	13.0%	.	.	12.7%
Not Provided by Applicant	Loan Originated	600	869	954	895	1052	787	5157
	Application Denied	91	93	106	88	113	107	598
	Denial Rate %	13.2%	9.7%	10.0%	9.0%	9.7%	12.0%	10.4%
Not Applicable	Loan Originated	2	6	3	5	33	3	52
	Application Denied	3	.	3
	Denial Rate %	8.3%	.	5.5%
Total	Loan Originated	8,449	8,566	8,120	8,419	9,649	8,966	52,169
	Application Denied	757	630	582	711	888	945	4,513
	Denial Rate %	8.2%	6.9%	6.7%	7.8%	8.4%	9.5%	8.0%

TABLE B.5a
HOME MORTGAGE DISCLOSURE ACT DATA
PRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES
BY ETHNICITY
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Ethnicity	Action Taken	2000	2001	2002	2003	2004	2005	Total
Hispanic	Loan Originated	296	349	645
	Application Denied	54	78	132
	Denial Rate %	15.4%	18.3%	17.0%

TABLE B.6
HOME MORTGAGE DISCLOSURE ACT DATA
SUBPRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Action Taken	2000	2001	2002	2003	2004	2005	Total
American Indian or Alaskan Native	Loan Originated	1	1	1	2	7	7	19
	Application Denied	1	1	.	.	10	.	12
	Denial Rate %	50.0%	50.0%	.	.	58.8%	.	38.7%
Asian or Pacific Islander	Loan Originated	5	5	3	6	31	38	88
	Application Denied	3	.	1	1	15	8	28
	Denial Rate %	37.5%	.	25.0%	14.3%	32.6%	17.4%	24.1%
Black	Loan Originated	7	5	13	18	64	105	212
	Application Denied	4	4	3	10	16	37	74
	Denial Rate %	36.4%	44.4%	18.8%	35.7%	20.0%	26.1%	25.9%
Hispanic race	Loan Originated	15	16	31	62	.	.	124
	Application Denied	9	13	9	44	.	.	75
	Denial Rate %	37.5%	44.8%	22.5%	41.5%	.	.	37.7%
White	Loan Originated	270	243	241	416	890	1,398	3,458
	Application Denied	131	91	81	150	290	424	1,167
	Denial Rate %	32.7%	27.2%	25.2%	26.5%	24.6%	23.3%	25.2%
Other	Loan Originated	6	3	6	6	.	.	21
	Application Denied	4	.	3	4	.	.	11
	Denial Rate %	40.0%	.	33.3%	40.0%	.	.	34.4%
Not Provided by Applicant	Loan Originated	34	51	34	87	133	119	458
	Application Denied	22	42	37	61	77	116	355
	Denial Rate %	39.3%	45.2%	52.1%	41.2%	36.7%	49.4%	43.7%
Not Applicable	Loan Originated	.	1	.	.	3	.	4
	Application Denied	.	3	1	.	7	.	11
	Denial Rate %	.	75.0%	100.0%	.	70.0%	.	73.3%
Total	Loan Originated	338	325	329	597	1,128	1,667	4,384
	Application Denied	174	154	135	270	415	585	1,733
	Denial Rate %	34.0%	32.2%	29.1%	31.1%	26.9%	26.0%	28.3%

TABLE B.6a
HOME MORTGAGE DISCLOSURE ACT DATA
SUBPRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY ETHNICITY
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Ethnicity	Action Taken	2000	2001	2002	2003	2004	2005	Total
Hispanic	Loan Originated	202	323	525
	Application Denied	61	106	167
	Denial Rate %	23.2%	24.7%	24.1%

TABLE B.7
HOME MORTGAGE DISCLOSURE ACT DATA
MANUFACTURED HOME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS
OWNER OCCUPIED HOMES BY RACE
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Action Taken	2000	2001	2002	2003	2004	2005	Total
American Indian or Alaskan Native	Loan Originated
	Application Denied	.	1	1
	Denial Rate %	.	100.0%	100.0%
Asian or Pacific Islander	Loan Originated
	Application Denied
	Denial Rate %
Black	Loan Originated	1	1
	Application Denied	1	1
	Denial Rate %	50.0%	50.0%
Hispanic race	Loan Originated
	Application Denied
	Denial Rate %
White	Loan Originated	4	6	1	.	.	.	11
	Application Denied	31	46	11	13	.	.	101
	Denial Rate %	88.6%	88.5%	91.7%	100.0%	.	.	90.2%
Other	Loan Originated
	Application Denied	1	1
	Denial Rate %	100.0%	100.0%
Not Provided by Applicant	Loan Originated	5	.	1	.	.	.	6
	Application Denied	16	11	10	.	.	.	37
	Denial Rate %	76.2%	100.0%	90.9%	.	.	.	86.0%
Not Applicable	Loan Originated	.	.	.	1	.	.	1
	Application Denied
	Denial Rate %
Total	Loan Originated	10	6	2	1	.	.	19
	Application Denied	49	58	21	13	.	.	141
	Denial Rate %	83.1%	90.6%	91.3%	92.9%	.	.	88.1%

TABLE B.7a
HOME MORTGAGE DISCLOSURE ACT DATA
MANUFACTURED HOME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER
OCCUPIED HOMES BY ETHNICITY
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Ethnicity	Action Taken	2000	2001	2002	2003	2004	2005	Total
Hispanic	Loan Originated
	Application Denied
	Denial Rate %

TABLE B.8
HOME MORTGAGE DISCLOSURE ACT DATA
PRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY GENDER
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Gender	Action Taken	2000	2001	2002	2003	2004	2005	Total
Male	Loan Originated	5,948	5,771	5,448	5,568	6,204	5,804	34,743
	Application Denied	475	380	343	462	533	596	2,789
	Denial Rate %	7.4%	6.2%	5.9%	7.7%	7.9%	9.3%	7.4%
Female	Loan Originated	2,075	2,169	2,019	2,317	2,869	2,782	14,231
	Application Denied	216	176	155	195	279	293	1,314
	Denial Rate %	9.4%	7.5%	7.1%	7.8%	8.9%	9.5%	8.5%
Not Provided by Applicant	Loan Originated	424	622	649	532	572	378	3,177
	Application Denied	66	74	83	54	76	56	409
	Denial Rate %	13.5%	10.6%	11.3%	9.2%	11.7%	12.9%	11.4%
Not Applicable	Loan Originated	2	4	4	2	4	2	18
	Application Denied	.	.	1	.	.	.	1
	Denial Rate %	.	.	20.0%	.	.	.	5.3%
Total	Loan Originated	8,449	8,566	8,120	8,419	9,649	8,966	52,169
	Application Denied	757	630	582	711	888	945	4,513
	Denial Rate %	8.2%	6.9%	6.7%	7.8%	8.4%	9.5%	8.0%

TABLE B.9
HOME MORTGAGE DISCLOSURE ACT DATA
SUBPRIME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES BY GENDER
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Gender	Action Taken	2000	2001	2002	2003	2004	2005	Total
Male	Loan Originated	232	198	218	393	724	1,064	2,829
	Application Denied	116	84	80	153	243	361	1,037
	Denial Rate %	33.3%	29.8%	26.8%	28.0%	25.1%	25.3%	26.8%
Female	Loan Originated	91	95	101	180	388	590	1,445
	Application Denied	49	47	41	86	149	196	568
	Denial Rate %	35.0%	33.1%	28.9%	32.3%	27.7%	24.9%	28.2%
Not Provided by Applicant	Loan Originated	15	31	10	24	16	13	109
	Application Denied	9	22	14	31	23	28	127
	Denial Rate %	37.5%	41.5%	58.3%	56.4%	59.0%	68.3%	53.8%
Not Applicable	Loan Originated	.	1	1
	Application Denied	.	1	1
	Denial Rate %	.	50.0%	50.0%
Total	Loan Originated	338	325	329	597	1,128	1,667	4,384
	Application Denied	174	154	135	270	415	585	1,733
	Denial Rate %	34.0%	32.2%	29.1%	31.1%	26.9%	26.0%	28.3%

TABLE B.10
HOME MORTGAGE DISCLOSURE ACT DATA
MANUFACTURED HOME LENDERS: ORIGINATED AND DENIED HOME LOAN APPLICATIONS
OWNER OCCUPIED HOMES BY GENDER
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Gender	Action Taken	2000	2001	2002	2003	2004	2005	Total
Male	Loan Originated	7	4	11
	Application Denied	19	31	10	7	.	.	67
	Denial Rate %	73.1%	88.6%	100.0%	100.0%	.	.	85.9%
Female	Loan Originated	.	2	1	.	.	.	3
	Application Denied	13	19	3	6	.	.	41
	Denial Rate %	100.0%	90.5%	75.0%	100.0%	.	.	93.2%
Not Provided by Applicant	Loan Originated	3	.	1	.	.	.	4
	Application Denied	17	8	8	.	.	.	33
	Denial Rate %	85.0%	100.0%	88.9%	.	.	.	89.2%
Not Applicable	Loan Originated	.	.	.	1	.	.	1
	Application Denied
	Denial Rate %
Total	Loan Originated	10	6	2	1	.	.	19
	Application Denied	49	58	21	13	.	.	141
	Denial Rate %	83.1%	90.6%	91.3%	92.9%	.	.	88.1%

TABLE B.11
HOME MORTGAGE DISCLOSURE ACT DATA
ORIGINATED AND DENIED HOME LOAN APPLICATIONS OWNER OCCUPIED HOMES
BY RACE AND SELECTED INCOME CATEGORIES
NORTH SHORE HOME CONSORTIUM: 2000 THROUGH 2005

Race	Action Taken	Missing	<\$30K	\$30-50K	\$50-80K	\$80-100K	\$100-150K	>\$150K	Total
American Indian or Alaskan Native	Loan Originated	12	4	16	32	24	19	10	117
	Application Denied	.	3	5	12	3	5	1	29
	Denial Rate %	.	42.9%	23.8%	27.3%	11.1%	20.8%	9.1%	19.9%
Asian or Pacific Islander	Loan Originated	49	12	131	356	235	407	217	1,407
	Application Denied	9	6	15	48	24	19	12	133
	Denial Rate %	15.5%	33.3%	10.3%	11.9%	9.3%	4.5%	5.2%	8.6%
Black	Loan Originated	22	10	98	261	118	107	30	646
	Application Denied	2	4	19	69	47	14	8	163
	Denial Rate %	8.3%	28.6%	16.2%	20.9%	28.5%	11.6%	21.1%	20.1%
Hispanic race	Loan Originated	84	47	242	378	117	71	43	982
	Application Denied	17	31	54	89	25	8	4	228
	Denial Rate %	16.8%	39.7%	18.2%	19.1%	17.6%	10.1%	8.5%	18.8%
White	Loan Originated	2,026	967	6,063	14,272	8,334	9,686	6,147	47,495
	Application Denied	298	294	849	1,451	682	737	474	4,785
	Denial Rate %	12.8%	23.3%	12.3%	9.2%	7.6%	7.1%	7.2%	9.2%
Other	Loan Originated	10	9	36	83	37	47	25	247
	Application Denied	5	7	9	14	4	1	5	45
	Denial Rate %	33.3%	43.8%	20.0%	14.4%	9.8%	2.1%	16.7%	15.4%
Not Provided by Applicant	Loan Originated	230	90	630	1,598	977	1,273	823	5,621
	Application Denied	95	75	163	277	125	150	105	990
	Denial Rate %	29.2%	45.5%	20.6%	14.8%	11.3%	10.5%	11.3%	15.0%
Not Applicable	Loan Originated	10	2	9	13	5	13	5	57
	Application Denied	3	.	5	4	.	2	.	14
	Denial Rate %	23.1%	.	35.7%	23.5%	.	13.3%	.	19.7%
Total	Loan Originated	2,443	1,141	7,225	16,993	9,847	11,623	7,300	56,572
	Application Denied	429	420	1,119	1,964	910	936	609	6,387
	Denial Rate %	14.9%	26.9%	13.4%	10.4%	8.5%	7.5%	7.7%	10.1%
Hispanic Ethnicity	Loan Originated	59	15	152	506	251	157	30	1,170
	Application Denied	14	12	46	126	66	32	3	299
	Denial Rate %	19.2%	44.4%	23.2%	19.9%	20.8%	16.9%	9.1%	20.4%

