

# 2025 BALTIMORE AREA FAIR HOUSING PLAN



May 2025

Participating  
Jurisdictions/  
Agencies



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# INTRODUCTION

The jurisdictions and public housing authorities participating in this 2025 Fair Housing Plan are the following, which comprise the Baltimore Regional Fair Housing Group:

- City of Annapolis and Housing Authority of the City of Annapolis
- City of Baltimore and Housing Authority of Baltimore City
- Baltimore County
- Harford County and the Havre de Grace Housing Authority
- Howard County and the Howard County Housing Commission

This 2025 Plan updates the 2020 Regional Analysis of Impediments to Fair Housing Choice (AI) in time for submission of new Consolidated Plans and Public Housing Authority Plans for fiscal years 2026-2030. It is the way the participants are choosing to carry out their statutory duty to affirmatively further the goals of the federal Fair Housing Act.<sup>1</sup> This document also helps these local governments carry out the new State level duty to affirmatively further fair housing created by the 2021 Maryland General Assembly.<sup>2</sup>

## Team of Partners and Consultants

The Baltimore Regional Fair Housing Group teamed with a set of partners and consultants to complete the analysis contained in this plan.

The Baltimore Metropolitan Council helped coordinate the members of the Fair Housing Group, consultants, and stakeholders. BMC organized meetings, managed email communication with a stakeholder list of more than 350, and assisted with editing and compiling this plan.



Root Policy Research served as the primary consultant for this plan, as they did for the 2020 Analysis of Impediments to Fair Housing Choice (AI), which set out action plans for 2020-2025. This plan serves as an update to that document, following the same structure. As for the 2020 document, Root Policy compiled relevant



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<sup>1</sup> 42 USC 3608(d), 3608(e)(5), 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), 1437C-1(d)(16).

<sup>2</sup> <https://planning.maryland.gov/Pages/OurWork/PBP/housing-element-mg/furthering-fair-housing.aspx>

data and used it to create maps and tables to help the Fair Housing Group and stakeholders understand the current state of the region as it relates to the Fair Housing Act. Root Policy also drafted the chapters of this report.

The Baltimore Regional Housing Partnership (BRHP), in addition to serving as a stakeholder for this process, also helped the Fair Housing Group update its 2014 regional Opportunity Map. That map, used for the 2020 Regional AI, used 92 indicators. The quintile opportunity map used in this plan is based on 20 indicators that closely mirror the indicators that BRHP used in administering its own regional housing mobility program created under the *Thompson v. HUD* fair housing lawsuit.

Finally, the Baltimore Neighborhood Indicators Alliance (BNIA) at the University of Baltimore's Jacob France Institute, conducted much of the analysis in Section VI of this document, updating and using a database of affordable housing created by BMC starting in 2016 and comparing it to both the Maryland Department of Housing and Community Development's opportunity map and the quintile map that the Fair Housing Group commissioned from BRHP.



## Structure of Report

After this introduction, our document begins with a description of how we involved stakeholders in the metropolitan area and gathered input from the public and key groups protected under the Fair Housing Act. Then we move to reporting on progress on our 2020 regional and local goals.

We then work through key demographic patterns and changes since our 2020 report, access to community assets and opportunity as they relate to the Fair Housing Act (FHA), and disproportionate housing needs among those groups protected by the FHA. Section VI looks at how publicly supported housing in our region relates to access to opportunity and how public investments have affected racially concentrated poverty.

The report then turns to a focus on access for persons with disabilities, zoning and land use and how they relate to housing supply, and fair housing enforcement. Finally, Section X includes regional and local action steps for 2025-2030.

The Regional Fair Housing Group is grateful to our team and stakeholders for helping us develop this plan and look forward to implementation over the coming five years.

## SECTION I.

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### COMMUNITY PARTICIPATION PROCESS

# SECTION I.

## Community Participation Process

The jurisdictions and public housing authorities participating in this Regional Analysis of Impediments to Fair Housing Choice (AI) are the following, which comprise the Baltimore Regional Fair Housing Group:

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- This 2025 AI updates the 2020 Regional AI in time for submission of new Consolidated Plans and Public Housing Authority Plans for fiscal years 2026-2030. It is the way the participants are choosing to carry out their statutory duty to affirmatively further the goals of the federal Fair Housing Act. This document also helps these local governments carry out the new State level duty to affirmatively further fair housing created by the 2021 Maryland General Assembly.<sup>1</sup>

### Outreach Activities

The Baltimore region's community participation process resulted in meaningful engagement of stakeholders and residents in three main ways:

1. A large regional stakeholder group and three topic-specific working groups
2. A survey of more than 1,300 residents
3. Focus groups with Spanish speakers and persons with disabilities.

### Stakeholder Engagement

Over the course of the 2012-2015 Opportunity Collaborative effort, regular Housing Committee meetings since then, our 2020 Regional AI, and now this process, we have built an email distribution list of more than 375 public- and private-sector stakeholders. That was our primary way of communicating about this new fair housing analysis.

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<sup>1</sup> <https://planning.maryland.gov/Pages/OurWork/PBP/housing-element-mg/furthering-fair-housing.aspx>

In addition, we have maintained a project web page for this analysis at <https://publicinput.com/baltfairhousing> that has attracted additional engagement – nearly 1500 views, 130 participants in a stakeholder survey posted there, 30 comments in that survey, and 87 subscribers to our updates. It was primarily this engagement that formed our topic-specific working groups, which themselves were a stakeholder suggestion from Housing Committee discussions in late 2023.

This interaction led to three large stakeholder meetings during the course of preparing this document. We structured these meetings to embody the public-private partnership of this effort, co-chaired by Charles Martin of M&T Bank and the rotating jurisdiction chair of our Baltimore Regional Fair Housing Group. When we began this process that role was held by Baltimore County DHCD Director Terry Hickey, and it was then assumed by Baltimore City DHCD Chief of Policy and Research Kimberly Rubens.

1. Virtual Kickoff May 14, 2024 attended by 68 people. At this meeting we:
  - a. Introduced our primary consultant Root Policy Research and additional partners Baltimore Neighborhood Indicators Alliance (affordable housing database analysis) and Baltimore Regional Housing Partnership (opportunity map).
  - b. Outlined our proposed process of developing this document, as well as our three proposed Working Groups and co-chairs of those groups.
  - c. Shared initial demographic data from Root Policy Research.
2. Virtual Meeting July 17, attended by 59 people, where we:
  - a. Shared our updated opportunity map and the latest data from Root Policy Research on renter and homeowner fair housing disparities.
  - b. Saw initial maps and figures from Root Policy's analysis of zoning and land use in the region.
  - c. Heard from our three Working Groups, which had all begun to meet.
3. Hybrid Lunch Meeting October 1, held at the Harriet Tubman Cultural Center in Columbia, with 36 people joining in person and 28 over Zoom, for a total of 64. At this meeting we:
  - a. Reviewed our timeline for finishing this study as well as our progress on some of our 2020 AI regional goals.
  - b. Saw data on recent overall housing production and initial analysis of how publicly supported housing relates to our new opportunity map.

- c. Heard reports from our Working Groups, including initial action step suggestions from two of them.
- d. Heard the topline findings of spring 2024 opinion research on housing and transportation funded by the Baltimore Regional Transportation Board.

The following are organizations and agencies that were represented in one or more of these larger stakeholder meetings:

- |  |  |
|--|--|
| ■ Abell Foundation                                 | ■ Leading Age Maryland                                   |
| ■ Annapolis Human Relations Commission             | ■ Live Baltimore   |
| ■ Association of Community Services Howard County  | ■ M&T Bank   |
| ■ Baltimore City Office of Equity and Civil Rights | ■ Maryland Affordable Housing Coalition                  |
| ■ Baltimore Community Lending                      | ■ Maryland Association of Nonprofit Organizations        |
| ■ Baltimore County Public Schools                  | ■ Maryland Building Industry Association                 |
| ■ Baltimore Healthy Start                          | ■ Maryland Center for Veterans Education and Training    |
| ■ Baltimore Regional Housing Partnership           | ■ Maryland Center on Economic Policy                     |
| ■ Bridges to Housing Stability                     | ■ Maryland Commission on Civil Rights                    |
| ■ Columbia Housing Center                          | ■ Maryland Department of Disabilities                    |
| ■ Community Development Network of Maryland        | ■ Maryland Department of Housing & Community Development |
| ■ Community Legal Services                         | ■ Maryland Legal Aid                                     |
| ■ Disability Rights Maryland                       | ■ Maryland Multi-Housing Association                     |
| ■ Economic Action Maryland                         | ■ National Fair Housing Alliance                         |
| ■ Equal Rights Center                              | ■ Pro Bono Resource Center of Maryland                   |
| ■ Enterprise Community Partners                    | ■ Public Justice Center                                  |
| ■ Fulton Bank                                      | ■ United Way of Central Maryland                         |
| ■ HomeFree USA                                     | ■ U.S. Department of Housing and Urban Development (HUD) |
| ■ Homeless Persons Representation Project          |  |
| ■ Horizon Foundation                               |  |

In between these larger meetings, these three Working Groups met in order to offer action step suggestions:

#### Working Group on Fair Housing Enforcement in the Private Market

- Co-Chaired by Susan McClannahan of the Equal Rights Center and David Skinner of Baltimore County DHCD.
- Met July 9 and 26, August 16 and 30, and September 13
- Identified barriers to fair housing enforcement, including a lack of public awareness of rights and how to report discrimination, a lack of housing provider awareness of obligations, challenges and delays in the administrative complaint process, and the need for a stronger regional government strategy to confront discrimination.
- Suggested action steps, including those in the regional action plan in this document.

#### Working Group on Barriers to Fair Housing for Renters

- Co-Chaired by Lisa Sarro of Arundel Community Development Services, Stephenie Horton of the Housing Authority of Baltimore City, and John Butler of Maryland Legal Aid
- Met June 5, July 24, August 21, and September 4 and 24.
- Identified barriers to fair housing for renters (who are disproportionately people of color), including impediments to locating and securing housing, to keeping housing/preventing evictions, and to ensuring safe and healthy rental housing.
- Suggested action steps, including those in the regional action plan in this document.

#### Housing Supply and Siting of Affordable Housing Working Group

- Co-Chaired by Kelly Cimino of Howard County DHCD and Peter Cimboic of the Baltimore Regional Housing Partnership
- Met July 12, September 25, and October 11.
- Reviewed information in this document on shortages of habitable homes, zoning and adequate public facilities constraints on housing production, and location of publicly assisted housing relative to opportunity maps.
- Suggested action steps, including those in the regional action plan in this document.

## Resident Survey and Focus Groups

Both the online survey of 1,300 metropolitan area residents and the focus groups with Spanish speakers and people with disabilities explored these residents' housing choices and preferences, challenges and experiences with displacement and housing discrimination, and access to opportunity. The Root team is grateful to the residents who shared their experiences and perspectives with fair housing and access to opportunity by participating in the resident survey and focus groups.<sup>2</sup>

Resident engagement purposely targeted low to moderate income households and households who are typically more vulnerable to barriers in housing choice, including single parents, persons with disabilities, people of color, people experiencing intimate partner violence (IPV), larger/extended families, Limited English Proficiency (LEP) populations, and residents seeking housing using a Housing Choice Voucher. To that end, the survey was promoted through the following channels:

- Public housing authorities in the region emailed the survey link to clients;
- Local housing agencies and private-sector stakeholders circulated to their distribution lists and constituencies.

Focus groups were held with persons with intellectual and developmental disabilities and residents of Hispanic descent.

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<sup>2</sup> In the figures in this section that report findings, the notation “n” provides the number of respondents to each question and is located at the end of every figure.



## 2024 ASSESSMENT OF FAIR HOUSING

### COMMUNITY ENGAGEMENT BY THE NUMBERS

**1,302** resident survey participants



**96** had a child under 18



**515** are single parents (no other adults in home)



**504** had a household member with a disability



**319** young adults (18-35)



**489** middle-age adults (36-64)

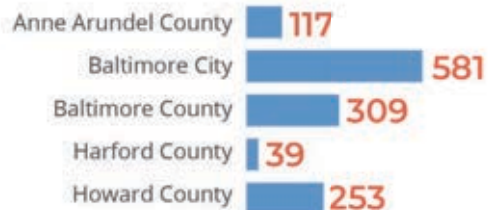


**47** seniors (65+)

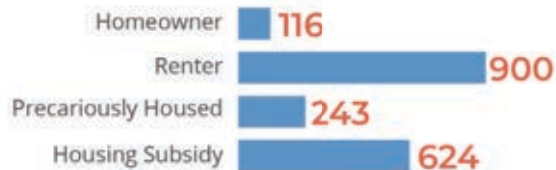


**81** LGBTQ+ status

### WHERE PARTICIPANTS LIVE



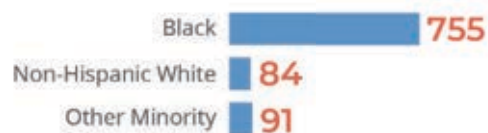
### HOUSING STATUS



### HOUSEHOLD INCOME



### IDENTIFY AS:



Source: Root Policy Research from the 2019 Baltimore Regional Fair Housing Survey.

## Focus Group Findings

**Spanish speaking community.** A focus group was held on October 15, 2024 and conducted in Spanish to explore issues related to housing experiences, discrimination, and challenges faced by the Latino community. Participants included homeowners and renters with diverse backgrounds from Mexico, Honduras, and Guatemala, among others. Several participants lived in the Brooklyn Park area of Anne Arundel County and others lived around Patterson Park in Baltimore City.

The participants of the focus group had varying lengths of residency in the Baltimore area. Some were long-term residents, having lived in Baltimore for 15 to 20 years. For example, one participant from Mexico had been living in the city for 20 years. Others were more recent arrivals, with around 5 years or less of residency in the area. For instance, one participant from Honduras had been in the city for 4 years, and another from Guatemala had been there for 5 years.

**Homeownership process.** Homeowner participants had diverse experiences. Some found the process to be straightforward, thanks to the support from local organizations such as the Latino Economic Development Center (LDC). The organization offered very intensive services, guiding the residents through the entire home buying process and assisting with all the necessary paperwork. Additionally, participants noted that having a bilingual and culturally competent real estate agent was very helpful in the process.

However, others faced difficulties in saving for down payments, especially undocumented participants who had to rely on private loans with higher interest rates. One participant mentioned that they were able to move to a different neighborhood and a larger home by purchasing a foreclosed property.

Some noted significant challenges, such as dealing with high property taxes after purchasing homes. One participant expressed concern over a \$4,700 annual property tax burden, making staying in homeownership more difficult.

**Renting experiences.** Renters often faced challenges in securing stable housing, particularly in overcrowded or poorly maintained properties. Some participants noted that they have been required to leave housing due to landlords refusing to renew the lease.

Another participant mentioned that they used to live in a one-bedroom apartment with their partner. They were asked to leave when they had a child because the apartment was considered too small for the three of them.

Participants also noted the difficulty in getting landlords to respond to their maintenance requests. They mentioned that their requests were often ignored or addressed very slowly. One participant shared their experience with a rental place that had bedbugs: The landlord

refused to acknowledge or treat the problem, and they had to move out and find another place to rent.

**Neighborhood and safety concerns.** Many participants highlighted crime and safety issues in their neighborhoods, with reports of frequent drug activity and shootings. Some shared personal experiences of violence, including assaults and break-ins. The general feeling was that while they attempted to live peacefully, neighborhood crime created stress and insecurity.

There was a noticeable absence of patrolling police in certain neighborhoods, exacerbating feelings of vulnerability. Residents frequently expressed frustration with inadequate police response times when crimes were reported.

**Neighborhood conditions.** The state of public spaces like parks and sidewalks was another common topic. While some participants praised improvements in local parks, others described issues such as poor maintenance, overflowing trash, and infestations of rats in their neighborhoods.

Participants also expressed concerns about dangerous driving in residential areas, which made it unsafe for children to play outdoors. In particular, high-speed traffic and drug-related activities made parts of the community feel unsafe.

Some participants noted demographic shifts in their neighborhoods; they have seen the Latino population grow in the neighborhood but have also noticed the White population leave the neighborhood.

**Discrimination and inequality.** A significant portion of the discussion focused on the perception that Latino residents received different treatment compared to other groups. Some participants felt that emergency services were slower to respond in Latino neighborhoods. This contributed to the feeling of being marginalized in the broader community.

Several participants shared incidents of familial housing discrimination. For example, families with young children faced challenges when trying to rent, as landlords preferred tenants without children. Others noted the difficulty in dealing with neighbors who generally dislike children.

**Public services and amenities.** Access to essential services such as schools, health clinics, and supermarkets was mixed. Some participants were satisfied with their children's schooling, noting that schools with Spanish-speaking staff were particularly beneficial. However, others reported bullying against their children and a lack of adequate responses from school administrators.

Healthcare access was generally regarded as adequate, though some participants noted long wait times or limited availability of Spanish-speaking healthcare providers.

Some participants found public transportation to be accessible and convenient, especially for reaching schools and certain areas. For example, one participant mentioned that the school was just two blocks away and that the bus stops were conveniently located nearby. However, participants also noted problems with public transportation, particularly regarding safety and reliability. Some expressed concerns about the lack of police presence in and around bus stops, making the areas feel unsafe, especially when drug activity was present. Additionally, some participants mentioned that while the transportation system was generally helpful for navigating the city, the bus system could be slow and unreliable, forcing them to commute twice as long as necessary.

### **Recommendations and Solutions**

Concerns about neighborhood safety, especially regarding crime and drug-related activities, and neighborhood conditions were a major theme. To address these issues, the following solutions were suggested:

- Increased police presence and patrolling. Participants emphasized the need for more frequent and visible police patrols, particularly in high-crime areas. They felt that more regular patrolling would deter criminal activities, such as drug dealing and prostitution, which were prevalent in their neighborhoods.
- Faster police response times. Participants shared frustrations over slow police response times, particularly in Latino neighborhoods. They recommended that local authorities address these disparities and ensure that emergency calls are prioritized equally across all communities.
- Improve trash collection and pest control. Participants described neighborhoods plagued by garbage accumulation and rat infestations. They recommended more frequent and effective trash collection services and coordinated pest control efforts to improve sanitation in these areas.
- Invest in park and sidewalk maintenance. Participants highlighted the need for better maintenance of parks and sidewalks. They suggested that local governments allocate more funds to keeping these public spaces clean and safe for families, especially children, who need safe outdoor spaces to play. Sidewalk repairs and snow removal were also noted as essential to improving pedestrian safety.

**Persons with disabilities.** Two focus groups with a total of 16 people and four one-on-one conversations were held with residents with disabilities who live throughout the region. Four staff members who work with people with disabilities participated in the groups.

The one-on-one conversations and one focus group were held virtually. One focus group was held with residents with intellectual and development disabilities (IDD) who reside in Harford County. The primary themes from these discussions are summarized in this section.

The demographics represented in the focus groups and conversations included:

- An equal split among genders;
- Fifteen African American residents;
- One White resident;
- Two Hispanic residents.

The living arrangements of the focus group attendees included:

- Ten individuals lived with family members—parents and nieces and siblings.
- Five lived in group home settings run by both small and large providers.
- Three lived with roommates.
- Two lived with their partners; one had two children.

**Group home environments.** Most of the residents were happy with their home environments, although those settings were not without challenges. Many had formed close bonds with their roommates.

**Housing and community choice barriers.** Although this has improved over time, some providers give residents limited options for choosing roommates and will reassign them to different homes to accommodate providers' needs over resident needs (for example, moving a less aggressive roommate to a different setting rather than properly accommodating the needs of the aggressive resident). Residents can be coerced into moving through incentives such as new room decor. It is challenging to determine if residents truly want to move—or if their providers or family members are pushing them into those decisions.

Challenges in maintaining staffing ratios due to program budgets limit residents' opportunities to fully enjoy their communities. In many cases, there is one staff member to four residents (1:4). If one resident needs to get medical care and a "floater" staff is unavailable, then all residents must travel together to the medical appointment. This can limit the opportunities of the other residents. Gender ratios also complicate care, and residents may need to be moved for the day if only opposite gender staff are available.

Residents who form committed relationships are sometimes prevented from living together because group homes cannot accommodate them. They may be limited in how often they can see each other due to transportation and staffing challenges.

Residents would like more opportunities to go on outings in their counties, including sports events (Orioles, University of Maryland sports), movies, and seeing friends outside of their homes more frequently. These events are sometimes too expensive, or need to be scheduled so far in advance that they are hard to make happen within group home settings.

A **solution** to the barriers presented above would be better funded group home environments, to allow lower staffing ratios so residents could have more flexibility in their preferences and more actively enjoy community amenities.

*“Our dream would be two staff members for each group home with 4 residents.”*

In the virtual focus group and one-on-one conversations, participants expressed need for more wheelchair-accessible parks and improved sidewalk designs to enhance mobility. One participant said they would like to hang out with friends in more community spaces and utilize accessible equipment in parks but have struggled to find such a place in their neighborhood in Baltimore. They felt that improved accessibility within common spaces would lessen the stigma of their disability. Others emphasized the importance of ramps, wider sidewalks, and accessible public transportation like buses and trains. Construction zones often disrupted mobility, and they desired alternative, accessible routes.

Cost was the most common barrier to housing for virtual participants. High security deposits and application fees posed financial barriers, with some turning to crowdfunding for assistance. Cost also limited housing options that met both accessibility and space needs. Some had to double up in bedrooms with family members to achieve affordability and accessibility. Physically moving was also identified as particularly challenging due to limited mobility and the need for financial resources to cover moving costs. One participant suggested a city program to assist with moving for people with disabilities when they need to move.

Several participants had applied for a housing voucher to ease their cost of housing, but long waitlists with little communication created additional frustration. One participant was unable to use their housing voucher after several landlords told him they did not accept them.

**Employment barriers.** Some day programs provide opportunities for residents to volunteer in their communities to build job skills. Many residents make strong, committed employees because they take their jobs very seriously, are good at following directions, and are very detail oriented. However, as employers have made jobs more complicated or “layered”—for example, requiring that people working in a deli must be able to work a meat slicer, or people working in a retail setting must be able to operate a cash register—residents have lost their opportunities for employment. Library jobs are in high demand by residents, but budget cuts and job requirements (beyond shelving books) have lowered those opportunities.

**Recommended solutions** to create more employment opportunities include employers could be educated and incentivized to better embrace the unique skills that these residents offer in the workplace—and how to accommodate the challenges residents face (see transportation access below). Families could do better to welcome employment opportunities and allow their IDD family members to explore their potential, without



irrational fears that they may lose their benefits (this would only occur if residents earned \$40,000 and more).

**Transportation** is also a challenge for maintaining employment. Public transportation is very limited in Harford County, and late buses can get residents fired. Group homes prioritize medical appointments over employment schedules. Mobility program buses are very limited and do not run on weekends. Group home program staff cannot always accommodate the job schedules of residents. Increased staffing would address this challenge.

Several participants in the virtual focus group and one-on-one interviews rely on partners or friends for transportation and preferred taking the train when they did use public transit. Taxis and ride-sharing services like Uber can be difficult to use. Some participants have had Uber drivers cancel their ride when they cannot help them into their car or fit their wheelchair to the trunk. "Access a Ride" and buses are also stressful to use. Some bus drivers have to help participants in wheelchairs get settled. One participant, who recently became a wheelchair user, avoided taking public transportation because of this.

**Discrimination.** Several virtual participants shared stories of illegal discrimination related to their race, family, disability, and/or sexual orientation, suggesting an enforcement challenge for the region:

- *"I toured an apartment with my uncle that was big enough for both of us but the landlord told us we would not be welcome there and that the community did not like Black people. We did not report this incident. We just went on and continued to try and find somewhere else."*
- *"I asked my landlord to install a wheelchair ramp at the entrance and to widen doorways to accommodate wheelchair, but the landlord said it was too expensive to make accommodations. I ended up looking for another place to live."*
- *"Tried to get a tour of a rental unit and I was told 'I didn't fit the profile.'"*
- *"I tried to rent a place and the owner told me 'wasn't looking to rent to Blacks' and said that I would be an inconvenience to my flat mates because of my disability."*
- *"Landlord said they wanted to rent to smaller family."*
- *"My friends with Social Security Disability Income have difficulty finding landlords that accept their income."*
- *"I looked at a place with lower counters and it was being rented by a pastor of a church. I toured with my partner and the pastor said he changed his mind and was no longer renting the house. I think my sexual identity was more of a barrier than skin color in that instance."*

*We did not report – we were trying to find a place quickly. Now rent from a lesbian and feel very comfortable in current housing.”*

- *“I have been told that a unit was available to tour and then when I show up Black and disabled they say it’s no longer available. I found out later that the property was available. Did not report this because I did not want to be considered an ‘unfriendly tenant’.”*
- *“There was an open viewing and after the property manager saw us, she pretended to make a call and said it was no longer for sale. Two weeks later it was still vacant. Most of the neighborhood was white. I think it was mostly based on race. We had a discussion about the incident with a disability rights group I am a part of. We reported that to the city. We haven’t heard anything from the city.”*

Participants suggested that landlords and real estate agents join diverse disability rights groups to better understand their experience. Regarding potential fair housing trainings, one participant said, “We should encourage this collaboration. I could have found a house much sooner.”

**Displacement.** Discrimination resulted in displacement for some virtual participants. One participant left their apartment after facing racial discrimination, where they and their partner, the only people of color in the building, were falsely accused of being loud and disrespectful. Another participant requested ramps and grab bars and after several unsuccessful exchanges with their landlord, they were forced to move in search of more accessible housing. Rent increases forced several participants to move when they did not want to. One reported they have moved six times due to rent increases.

In Carroll County, a participant faced uncertainty when their landlord announced the demolition of their building, leading to months of legal uncertainty. They were finally given three months’ notice to leave but had difficulty covering deposits for a new place. The participant drained their savings and borrowed money from a family member to cover the associated moving fees.

**Financial stability.** Several virtual participants reported being behind on bills. Some expressed that food and housing assistance would help them catch up and save for emergencies. One participant faced difficulties applying for food stamps, only resolving the issue through a personal connection in human services. Car repairs depleted another’s savings and left them without transportation for two weeks. They were reliant on friends and rideshares during this time.

Social networks played an important role during financial emergencies. A participant from the LGBTQ+ community relies on mutual aid groups, both giving and receiving help as needed. Others highlight the importance of financial support from close-knit family and community networks, particularly within the Black community.



## Resident Survey Findings

**Geographic note.** Throughout this section, survey data reported Anne Arundel County include responses from residents who live in either the City of Annapolis or elsewhere in Anne Arundel County. There were only three responses from residents of Queen Anne's County; as such, these responses are included in the region totals, but are not separated in the analysis due to the small sample size.

### Explanation of terms.

- "Precariously housed" includes residents who are currently homeless, living in transitional or temporary/emergency housing, or are staying with friends or family temporarily and not on the lease or property title. These varying subgroups are also compared throughout the section as sample size allows.
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Single parents" are respondents living with their children without a spouse. Single parents living with other adults and those living alone are also compared throughout the section as sample size allows.
- "Housing subsidy" refers to a respondent whose household's housing costs are subsidized by a housing voucher (e.g., Section 8/Housing Choice Voucher), public housing, LIHTC, project-based Section 8, deed-restricted ownership products, and any other place-based housing subsidies.
- "Intimate partner violence (IPV)" experience was self-reported by respondents. This includes sexual assault, stalking, physical violence, and psychological aggression.

**Sampling note.** The survey respondents do not represent a random sample of the regional population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample.

Based on the total number of responses, respondent demographics, and the primary source for soliciting participation—especially outreach to current recipients of subsidized housing and those on waitlists for housing assistance—the data provide a rich source of information about the region's lowest income households and their experience with housing choice and access to opportunity in the communities where they live.

When considering the experience of members of certain groups within jurisdictions, some sample sizes are too small ( $n < 40$  respondents) to express results quantitatively. In these

cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

**Framework for presenting results.** Findings from the survey are summarized for segments of the respondent population—by jurisdiction, tenure, selected household characteristics, race, and income—where sample sizes are sufficient for reporting. We also present snapshots of resident experience and perspective overall on experience with housing discrimination and displacement and for several opportunity indicators—access to quality public schools, health, employment, and transportation.

**Figure I-1.**  
**Resident Survey Sample Sizes by Jurisdiction and Selected Characteristics**

	Anne Arundel County	Baltimore City	Baltimore County	Harford County	Howard County	Region
<b>Total Responses</b>	<b>117</b>	<b>581</b>	<b>309</b>	<b>39</b>	<b>253</b>	<b>1,302</b>
<b>Race and Ethnicity</b>						
Black/African American	53	366	204	16	116	755
Other Minority	9	30	21	5	26	91
Non- Hispanic White	24	26	7	3	22	84
<b>Household Type</b>						
LEP (Spanish)	1	1	1	1	2	6
Couple with children	13	31	26	5	21	96
Single parent	52	210	159	15	79	515
Living alone	42	147	132	11	68	400
Living with other adults	10	63	27	4	11	115
IPV	14	116	36	6	19	25
LGBTQ+	7	59	8	2	4	81
Large family (5+ members)	18	78	53	6	25	180
Disability	46	224	111	17	104	504
Seniors (age 65+)	3	21	7	2	14	47
<b>Housing Situation</b>						
Homeowner	22	30	13	0	50	116
Renter	83	357	246	27	186	900
Without lease	4	32	7	1	3	48
With lease	79	325	239	26	183	852
Precariously housed	9	179	37	8	9	243
Living with friends/family	6	116	26	5	6	159
Sheltered homeless	1	27	8	1	2	40
Unsheltered homeless	2	36	3	2	1	44
Housing subsidy	62	206	166	21	168	624
<b>Household Income</b>						
Less than \$15,000	20	181	97	10	61	369
\$15,000 up to \$25,000	8	40	21	5	20	94
\$25,000 up to \$50,000	25	101	66	7	30	230
\$50,000 or more	27	56	27	3	43	157

Note: IPV refers to people experiencing intimate partner violence. Numbers do not aggregate either due to multiple response or because respondents did not choose to provide a response to all demographic and socioeconomic questions.

Source: Root Policy Research from the 2024 Baltimore Regional Fair Housing Survey.

## Primary Findings

The survey findings complement the data analysis in other report sections by providing a more in-depth picture of how different types of residents in the region experience housing choice.

The survey findings reveal how a housing market where housing availability and affordability is constrained adversely affects the choices of certain protected classes—specifically, people who have experienced domestic violence (largely women and often single parent households); people with disabilities; voucher holders; and people of color.

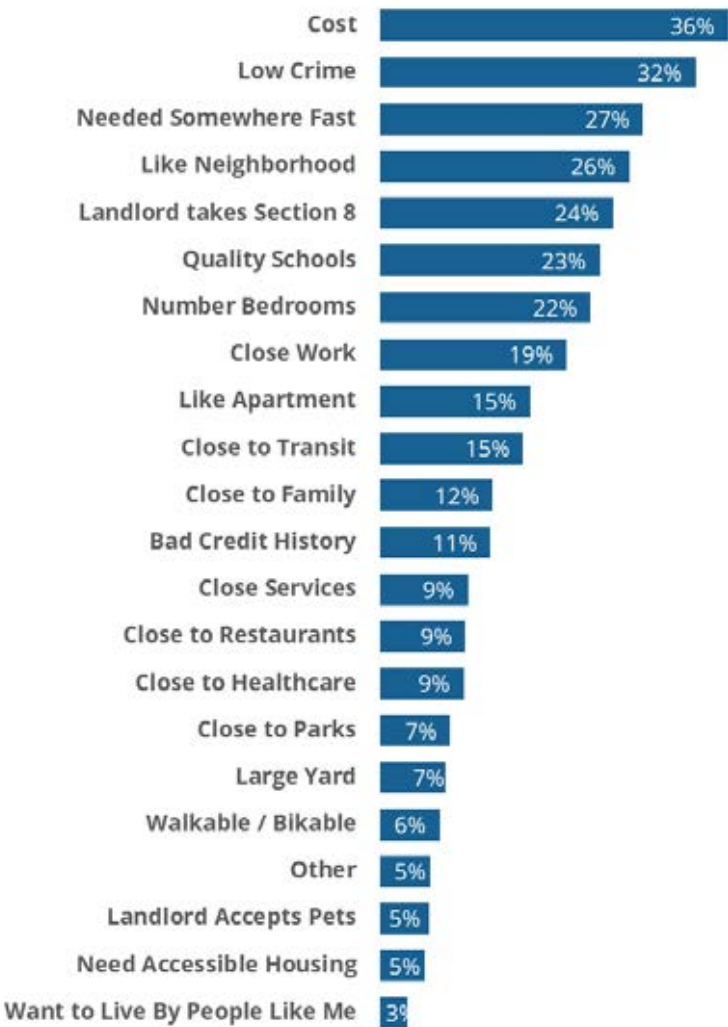
### Housing choice

- Cost and low crime rates were the top reasons why people chose their current housing—consistent with results from the 2019 survey. Single parents selected cost and low crime rate more frequently than school quality. Large families considered the number of bedrooms and “needing somewhere quickly” as their top two factors.

**Primary Factors in Current Housing Choice**

Note:  
n = 1,302.

Source:  
2024 Baltimore Regional Housing Survey.



- The majority of residents would like to move if they could—and often this related to preferences, like finding a bigger house. Many residents need to move for other reasons (affordability, condition, overcrowding) and move preferences are stronger for BIPOC residents and people with Intimate Partner Violence (IPV) experience, single parents, disability, and those living within a large household.

## Most Important Factors in Choosing Current Home by Jurisdiction

### JURISDICTION

Baltimore Region			Baltimore City			Baltimore County		
1	Cost	36%	1	Cost	38%	1	Low crime rate / safe	42%
2	Low crime rate / safe	32%	2	Needed somewhere quickly	35%	2	Like neighborhood	33%
3	Needed somewhere quickly	27%	3	Close to transit	21%	3	Quality schools	33%
4	Like neighborhood	26%	4	Close to work	20%	4	Cost	28%
5	Landlord takes Section 8	24%	5	Low crime rate / safe	19%	5	Number of bedrooms	27%
Anne Arundel County			Harford County			Howard County		
1	Cost	41%	1	Low crime rate / safe	44%	1	Low crime rate / safe	48%
2	Low crime / safe	41%	2	Like neighborhood	31%	2	Landlord takes Section 8	34%
3	Landlord takes Section 8	34%	3	Like apartment	31%	3	Cost	21%
4	Needed somewhere quickly	25%	4	Cost	26%	4	Quality schools	21%
5	Like neighborhood	23%	5	Quality schools	26%	5	Like neighborhood	19%

Note: n = 1,302.

Source: 2024 Baltimore Regional Fair Housing Survey.

- The region's lack of available, affordable housing affects some groups more than others. The survey found that respondents who have experienced Intimate Partner Violence (IPV) with and without kids prioritized needing somewhere quickly first in their reasons for choosing housing, followed by cost. This was also true of single parents living with other adults.
- Of the respondents who indicated that their voucher was somewhat or very difficult to use, 54% said that not enough properties that accept vouchers, followed by 43% who reported that landlords have policies of not renting to voucher holders and 43% who said that there is not enough time to find a place to live before the voucher expires.

### Housing condition and health

- Households with a disability, large households, and renters disproportionately reported a pest infestation in their housing.
- 25% of renters report being displaced due to mold in their apartment, which was the top reason they were displaced (a higher rate than being displaced because rent increased).

- 45% of residents with IPV experience reported being displaced from their homes because they and their children were living in unsafe conditions.
- Households with disabilities are more likely than others to report health conditions associated with housing including asthma, lead exposure, and inability to find accessible place.
- Very high rates of poor mental health are reported by residents with IPV experience (45%); residents with disabilities (40%); those in unstable or precarious housing situations (36%)—and, geographically, those living in Harford County (34%) and Baltimore City (31%).

### **Housing challenges**

- 24% of survey respondents reported they had been displaced in the past five years; this was down from the 29% who reported being displaced in the 2019 survey. Respondents with IPV experience reported the highest displacement rate (61%), followed by precariously housed respondents (51%), respondents in Baltimore City (35%; this was 38% in 2019), large households (29%), and households with income less than \$15,000 (28%). The most common reason for displacement was eviction due to rental arrears (23%), followed by rent increase (21%), personal or relationship reasons (20%), lost job (20%), and mold (18%).
- 26% of survey respondents reported that they had been denied housing in the past five years. Respondents with IPV experience had the highest denial rate (44%) followed by precariously housed individuals (41%), residents of Harford County (39%), large households (36%), and residents of Baltimore City (31%). The most common reason for denial was bad credit (50%), followed by income being too low (48%), landlord not accepting Section 8 (15%), and previous eviction (13%).
- 47% of voucher users reported it was somewhat difficult to use their voucher and 27% said it was very difficult to use their voucher. This is slightly down from 2019. Respondents with IPV experience reported the greatest degree of difficulty using vouchers, with 52% reporting it was very difficult to use their voucher. This group was followed by large households, with 43% reporting it was very difficult to use their voucher.

### **Discrimination in housing**

- 15% of respondents in the region reported that landlords did not return their calls after inquiring about a unit and 9% were told that the unit was no longer available when they showed up in person. This differed by race, with 19% of Black renters reporting that landlords did not return calls compared to 8% of White renters; the rate was also high for persons with disabilities (20%). Notably, 7% of respondents within large households were told by the landlord that children were not allowed compared to 2% of all respondents in the region.

- 18% of survey respondents reported that they felt discriminated against when looking for housing in the Baltimore area—this compares to 17% in 2019. By race, discrimination was reported by 18% of Black respondents, 13% of White respondents, and 22% of other race respondents. Respondents with IPV experience reported the highest rate of discrimination (32%). A quarter (25%) of respondents who identified as LGBTQIA+ reported experiencing discrimination in the Baltimore area compared to 18% who did not identify as LGBTQIA+.

### **Neighborhood challenges**

- Regionally, the most common neighborhood challenge was identified as high crime within the neighborhood at 21%. Respondents in Baltimore City disproportionately experienced several neighborhood challenges, including 38% who identified high crime within their neighborhood.
- Except for “too much traffic” and “proximity to health care and emergency services” Baltimore City residents report much higher rates of challenges to accessing services and amenities than other residents.
- 15% of residents say that in the past month lack of reliable transportation has kept them from medical appointments, meetings, work, or getting things needed for daily living.
- The largest variance in reported differences in community amenities were in quality schools and crime. Baltimore City residents reported the lowest quality schools and highest crime, while Howard County residents reported high quality schools and lower crime. Overall, Howard County residents reported the highest satisfaction with neighborhood conditions across amenity categories.
- 24% of respondents overall report feeling welcome in their communities. Harford County residents are most likely to feel unwelcome with 38% saying they do not feel welcome in the county.



## SECTION II.

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### ASSESSMENT OF PAST GOALS AND ACTIONS

## **SECTION II.**

# **Assessment of Past Goals and Actions**

This section provides an assessment of past goals and actions from the 2020 Analysis of Impediments to Fair Housing Choice (AI). It begins with progress toward the 2020 regional goals and then presents individual jurisdiction progress.

## Regional Assessment of Past Goals and Actions

2020 AI Goal	Status
<b><i>Enhance regional fair housing capacity</i></b>	
<p><b>Goal 1:</b> Continue to support housing policy coordination staffing at BMC to coordinate the implementation of the Action Plan in the 2019 Regional AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).</p>	<p><b>Complete and Continuing:</b> All participating jurisdictions have signed 2 three-year memoranda of understanding (MOUs) increasing their combined contribution to more than \$60,000 per year. They also signed an additional MOU committing resources and participation in this 2025 Regional Analysis of Impediments to Fair Housing Choice (AI). BMC has continued to produce a progress report each year that local governments use for their CAPERs.</p>
<p><b>Goal 2:</b> Coordinate regionally to support the new Fair Housing Action Center of Maryland. Ensure systematic paired testing for discrimination, including for Maryland's new law banning discrimination based on source of income.</p>	<p><b>Incomplete:</b> The Fair Housing Action Center of Maryland is now the fair housing program at Economic Action Maryland (EAM). With funding from some Baltimore-area jurisdictions, EAM has conducted 79 paired or triple tests over this period for discrimination including source of income and lending. Two jurisdictions have funded the Equal Rights Center to conduct an additional 83 tests.</p> <p>In its testing work, EAM highlighted that Maryland is one of 11 states where testers cannot make audio recordings of tests, leading to so-far unsuccessful 2023 and 2024 State legislation to allow the practice.</p> <p>EAM also conducted 18 trainings over this period, reaching about 80 property owners/managers among the 200+ people reached overall. For a period, BMC facilitated fair housing enforcement coordination calls between local civil rights agencies and the Maryland Commission on Civil Rights. Because jurisdictions had hoped for more systematic coordination of fair housing enforcement and enforcement from paired testing, they made Enforcement in the Private Housing Market a working group for this 2025 Regional AI.</p>

2020 AI Goal	Status
<p><b>Goal 3:</b> BMC continue to convene local and State housing agencies with housing practitioners and advocates through BMC’s Housing Committee to review progress on implementing 2020 Regional AI action steps and strategize on further action.</p>	<p><b>Complete and Continuing:</b> BMC convened 32 Housing Committee meetings over four years, including meetings focused on pandemic rental assistance, Low Income Housing Tax Credit (LIHTC) award guidelines, racial homeownership gaps and special purpose credit programs, equity planning in Baltimore City, housing affordability preservation, housing supply and local land use reforms, overall implementation of the 2020 AI Regional Action Plan, and stakeholder involvement for this 2025 Regional AI.</p>
<p><b><i>Increase rental housing options</i></b></p>	
<p><b>Goal 4:</b> Sustain the Baltimore Regional Project-Based Voucher (PBV) Program beyond the initial 2015 HUD seed grant, identifying new funding for the program’s operations and contributing vouchers as appropriate.</p>	<p><b>In Progress:</b> Participating public housing authorities (PHAs) are sustaining central coordination of the program at BMC and have contributed enough vouchers but have not yet identified sustainable funding for mobility counseling. RFPs are on hold until that funding is identified.</p> <p>So far the program has committed 150 vouchers to 13 developments in six jurisdictions, exceeding our reduced goal of 140 (from 200) by June 30, 2025. 44 units are leased, short of our goal of 70 (reduced from 120).</p>
<p><b>Goal 5:</b> Continue to monitor the Maryland Department of Housing and Community Development’s (DHCD’s) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that:</p> <p>a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area’s proportion of the State’s low income population.</p>	<p><b>In Progress:</b> BMC has helped the Regional Fair Housing Group monitor DHCD’s awards of 9% LIHTC, and the Fair Housing Group has submitted four sets of comments on the development of the 2022 and 2023 QAPs. Since July 1, 2020, the Baltimore area has received 49% (1,157) of statewide 9% units awarded (2,371), close to our 50% goal.</p> <p>DHCD has awarded 56% (650) of those Baltimore-area 9% LIHTC units in Communities of Opportunity (COOs), with the other 44% of units (507) in revitalization areas. While, driven by the 2023 round, this an overall majority of units have been awarded in COOs, DHCD has resisted our recommendation to more strongly incentivize</p>

2020 AI Goal	Status
b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas.	these awards to reach our 65% goal. DHCD has also resisted our revitalization recommendation to incentivize more strongly awards in Choice Neighborhoods communities.
<b>Goal 6:</b> Baltimore-area PHAs see the merit in a regional mobility counseling program and will seriously consider applying for the HUD Mobility Demonstration once the requirements are made known through the HUD NOFA.	<p><b>Complete:</b> Baltimore-area PHAs did submit an unfortunately unsuccessful application for this Mobility Demonstration program.</p> <p>While Baltimore-area PHAs were not able to respond quickly enough to the follow-up 2023 HUD Mobility Notice of Funding Availability (NOFO), we are watching for additional funding opportunities.</p>
<b>Goal 7:</b> Continue to distribute portability educational booklets and show video in all PHA voucher briefings. Conduct an electronic survey of voucher holders who have ported within the metropolitan area in the last two or more years and, where possible, attempted to port in order to identify how much difficulty they may have experienced. Use the findings to develop plans for intra-regional ports moving forward.	<p><b>Complete and Continuing:</b> PHAs continue to distribute booklets and show videos to new voucher holders at briefings. They have initiated a process to update some of the information.</p> <p>In fiscal year 2022, the PHAs conducted a survey with responses from 18 voucher holders who had recently ported or attempted to port. Results demonstrated overall satisfaction with the porting process.</p>
<b>Goal 8:</b> Through Regional Preservation Task Force, assist local governments in designing affordable housing contracts to facilitate preservation at their expiration.	<p><b>Incomplete:</b> In exploring this action item, we realized that requirements for affordability would need to be done in conjunction with Maryland DHCD, as generally the primary funder.</p> <p>We did engage with Maryland DHCD on concerns about investors inappropriately extracting funds at their Year-15 exit that could otherwise contribute to long-term maintenance and affordability. March and July 2023 comments by the Baltimore Regional Fair Housing Group resulted in changes in the 2023 QAP that prevent an investor from seeking early termination of affordability requirements,</p>

2020 AI Goal	Status
	inappropriately removing the general partner or managing member, and drawing from project reserves upon exit.
<b>Goal 9:</b> Ensure that PHA policies do not have a disparate impact on the ability of persons with disabilities to obtain and maintain housing, offering a reasonable accommodation whenever required.	<b>Complete:</b> Baltimore-area public housing authorities heard suggestions from and held a discussion with two attorneys with Community Legal Services in January 2024. All PHAs believe they have made any necessary changes to comply with the fair housing rights of people with disabilities participating in their programs.
<b>Goal 10:</b> Ensure that people with disabilities have control in the choice of their service provider by prohibiting leases that require tenants to receive supportive services from the provider operating the housing. Ensure that tenants cannot be evicted or discharged for reasons unrelated to their housing or a breach of their lease.	<b>Complete:</b> Baltimore-area public housing authorities heard suggestions from and held a discussion with two attorneys with Community Legal Services in January 2024. All PHAs believe they have made any necessary changes to comply with the fair housing rights of people with disabilities participating in their programs.
<b><i>Increase ownership opportunities for under-represented households</i></b>	
<b>Goal 11:</b> Engage lenders in discussions about homeownership and mortgage lending disparities and how to address. Seek investments in financial literacy programs (including in schools) and assistance in helping subprime	In Progress: BMC conducted a series of six focus groups with area housing counseling agencies, leading to the Regional Fair Housing Group developing a set of strategies to tackle racial homeownership gaps in 2021. Five Fair Housing Group jurisdictions added new down payment assistants and/or increased assistance through

2020 AI Goal	Status
loan holders refinance to conventional loans. Develop specific action steps to address disparities in the minority homeownership rate.	existing programs. Given the limited impact of those changes, Fair Housing Group focus increasingly shifted to the impact of restricted supply of homes to buy on ability of households of color to access homeownership. Funded by the Baltimore Regional Transportation Board (BRTB), BMC conducted online opinion research and focus groups on public perceptions around transportation, housing affordability and supply, and how they relate to each other.
<b><i>Address barriers to equalizing access to opportunity</i></b>	
<b>Goal 12:</b> Support transformative investments in Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) and similarly highly challenged markets, such as the renewal of State Project CORE (Creating Opportunities for Renewal and Enterprise) funding for Baltimore City.	<b>Incomplete:</b> Regional support has not yet been sought or potentially needed for this kind of investment.
<b>Goal 13:</b> Support improved public transit access, including for persons with disabilities, to suburban job centers and opportunity areas with multifamily housing.	<b>Incomplete:</b> While the Housing Committee has worked to stay up to date on developments in Baltimore-area public transportation, the Fair Housing Group has not taken specific action on this topic.

2020 AI Goal	Status
<p><b>Goal 14:</b> Work with relevant agencies, such as the Maryland Transit Administration (MTA), to explore State or regional/federal support for alternatives to public transportation, such as Vehicles for Change, Lyft, Uber, etc., ensuring accessibility for persons with disabilities.</p>	<p><b>Incomplete:</b> While the Fair Housing Group has worked to stay up to date on efforts within MTA, BRTB, and private organizations to explore this area, it has not yet resulted in joint action. BRTB is currently working with its consultant Foursquare to explore options for implementing or expanding microtransit in the Baltimore region – on-demand services that can reach beyond current fixed-route transit.</p>
<p><b>Goal 15:</b> Work with Maryland DHCD to make its data on housing it assists more readily available, including unit affordability levels, units targeted to persons with disabilities (and how many are occupied by persons with disabilities), units occupied by housing choice voucher holders, and residents by race and disability.</p>	<p><b>In Progress:</b> BMC has made two Public Information Act requests on behalf of the Regional Fair Housing Group. An analysis of the 2021 data revealed housing choice voucher use missing from 90% of units. On the other hand, it also showed that lower-income Black households were substantially able to access new opportunity-area LIHTC units created under DHCD's 2017 fair housing voluntary conciliation agreement. 2022 data obtained through a 2024 PIA request is being analyzed as part of this study. No progress yet made on accessing this data more routinely, without a PIA request.</p>
<p><b>Goal 16:</b> Using the latest research, prepare and make available educational materials on the benefits that subsidized and accessible housing can bring to all members of vibrant communities.</p>	<p><b>In Progress:</b> The Fair Housing Group has not yet explored this for specifically subsidized and accessible housing, but FY24 housing-transportation opinion research funded by the BRTB yielded compelling results regarding housing supply and its relationship to public transit and transportation overall.</p>



2020 AI Goal	Status
<p><b>Goal 17:</b> BMC and Fair Housing Group facilitate meetings of local school district officials and housing agency leaders in 3-5 jurisdictions to explore coordinated action to benefit high quality, equitable education.</p>	<p><b>Incomplete:</b> While this action step has not yet resulted in local meetings, Fair Housing Group jurisdictions recognize the significant impact of adequate public facilities ordinances for crowded schools on housing production. An analysis of that issue is part of this study.</p>
<p><b>Goal 18:</b> BMC facilitate at least one meeting where jurisdictions – either within or outside the region – pursuing equity assessments of investments and/or policies can share their methodologies with other local governments.</p>	<p><b>Complete:</b> The Baltimore City Planning Department presented on its Equity in Planning work at the December 2, 2021 Housing Committee meeting.</p>
<p><b>Goal 19:</b> Assist the Community Development Network of Maryland (CDN) in convening local government, community development organizations, and health care institutions in the Baltimore region to discuss the role of housing and community development in those institutions' development of their 2022 Community Health Needs Assessments (CHNAs).</p>	<p><b>Incomplete:</b> While we did not connect with health care institutions for their 2021 CHNAs, BMC and the Regional Fair Housing Group did:</p> <ul style="list-style-type: none"> <li>• Host the Maryland Citizens Health Initiative at our August 5, 2021 Housing Committee meeting to discuss the Health Equity Resource Communities rebooted and expanded through 2021 Maryland state legislation.</li> <li>• Reconnect with area hospitals regarding their 2024 CHNAs as part of this study.</li> </ul>

2020 AI Goal	Status
<b><i>Expand fair housing resources and compliance</i></b>	
<p><b>Goal 20:</b> Continue to engage with Maryland DHCD to make <a href="http://www.MdHousingSearch.org">www.MdHousingSearch.org</a> an effective:</p> <ul style="list-style-type: none"> <li>a. Clearinghouse of publicly assisted and market rate rental homes, including homes accessible to persons with disabilities, and</li> <li>b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and other agencies.</li> <li>c. Viable tool for public housing authorities (PHAs) to refer their housing choice voucher holders, including those with disabilities.</li> </ul>	<p><b>In Progress:</b> We reiterated a request to Maryland DHCD to automatically populate accessibility features based on fair housing requirements, but have not yet gotten a commitment.</p> <p>As of fall 2021, Md. Housing Search has a helpful feature where users can save search criteria and get notifications when rental homes become available.</p> <p>As of FY23, five of six PHAs include Md. Housing Search in the resources they offer to their applicants, residents, and voucher holders.</p> <p>At Maryland DHCD's suggestions, Fair Housing Group PHAs modified DHCD's template for the MOU they now require between LIHTC development owners and local PHAs/mobility programs to facilitate referrals. The template requires LIHTC owners to:</p> <ul style="list-style-type: none"> <li>• Provide notice of first lease-up and establish accurate listings on Md. Housing Search at least 30 days before first lease-up.</li> <li>• When screening that PHA's voucher holders, not apply a minimum credit standard, not consider loan or medical debt, and accept that PHA's criminal background screening.</li> </ul> <p>In April 2024, the first LIHTC owner signed that template with the Baltimore Regional Housing Partnership.</p>
<p><b>Goal 21:</b> All PHAs offer online rental resources beyond GoSection8.com, including market-rate resources such as Apartments.com and Zillow and, as it becomes more effective, Md. Housing Search.</p>	<p><b>In Progress:</b> As of FY 2023, five of six PHAs include additional online rental resources beyond GoSection8.com and refer applicants, residents, and voucher holders to Md. Housing Search.</p>

2020 AI Goal	Status
<p><b>Goal 22:</b> Review literature on criminal background and subsequent criminal activity – connected to assisted housing, if possible – to see what that research indicates the most justified criminal background standard for assisted housing should be.</p>	<p><b>Complete:</b> On behalf of participating PHAs, BMC conducted an internet search and reviewed the HUD Policy Development &amp; Research 2022 post on criminal background, including its sources. PHAs also reviewed HUD’s proposed 2024 rule on access to assisted housing, which also reviews the relevant research. Most Fair Housing Group PHAs believe they are already complying with HUD’s proposed rule. All conduct individual assessments, and most do not look back more than three years for criminal convictions.</p>
<p><b>Goal 23:</b> Conduct a training for local government and public housing authority officials on the duty to affirmatively further fair housing following each State election cycle.</p>	<p><b>Complete:</b> BMC and Regional Fair Housing Group held a September 2023 training by attorney Sara Pratt at BMC, attended by 19 officials from all six Fair Housing Group jurisdictions. The group included representation from two planning departments and three law departments.</p>
<p><b>Goal 24:</b> BMC and Regional Fair Housing Group sponsor fair housing trainings for property managers at least twice per year.</p>	<p><b>Complete and Continuing:</b> Starting in FY 2022, Economic Action Maryland held a total of eight trainings for a total of 73 property managers on topics such as source of income, disability, and general fair housing compliance.</p>
<p><b>Goal 25:</b> Work with Maryland DHCD, fair housing organizations, and HUD Fair Housing and Equal Opportunity (FHEO) to convene affirmative marketing training for the affordable housing industry as well as state and local agencies involved in the financing and/or developing of affordable housing.</p>	<p><b>In Progress:</b> BMC staff held regular conversations with Maryland DHCD staff starting in fiscal year 2022 to create an affirmative marketing training. Also in FY 2022, the Fair Housing Group surveyed more than 100 property managers to gauge training needs. FY23 analysis of 2021 LIHTC property occupancy (see #15 above) showed that Black households were generally able to access LIHTC high-opportunity properties. That analysis and 2020 Regional AI showed that training might need to be targeted to particular properties. Fair Housing Group anticipates using updated analysis for this AI to guide future action steps.</p>

2020 AI Goal	Status
<p><b>Goal 26:</b> Identify the best way (e.g. electronic, paper) to disseminate information regarding fair housing rights and responsibilities to renters, property owners and managers, homebuyers, and real estate agents and then implement that best way.</p>	<p><b>Incomplete:</b> No action taken on this step so far.</p>

## City of Annapolis Assessment of Past Goals and Actions

2020 AI Action Item	Status
<b><i>Overall Goal 1: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.</i></b>	
Continue to make available and distribute literature and informational material, in English and Spanish, concerning fair housing issues, an individual's rights, and landlord's responsibilities to affirmatively further fair housing.	<b>Complete</b>
Improve information on the Annapolis Fair Housing Law given to landlords participating in the city's rental license program.	<b>Complete</b>
Improve language access for the city's non-English speakers, particularly the Latino and Hispanic community	<b>Incomplete</b>
Improve voucher holders' knowledge of the Source of Income protection in fair housing law.	<b>Complete</b> (via Housing Authority, not directly by the City)
<b><i>Overall Goal 2: Revise the City Zoning Code to affirmatively further fair housing.</i></b>	

2020 AI Action Item	Status
<p>Improve the City's regulation of group homes for persons with disabilities so not to impede the creation of group homes, limiting housing choice for the disabled in Annapolis.</p>	<p><b>Incomplete.</b> However we have employed federal FHA and ADA standards and principles in plan and permitting decision so as not to deny fair housing to disabled applicants.</p>
<p>Review regulations to ensure the rules are required to support health and safety without potentially impacting protected classes.</p>	<p><b>In progress</b></p>
<p><b><i>Overall Goal 3: Promote and encourage the construction and development of additional affordable rental housing units in the area, especially for households whose income is less than 80% of the median income.</i></b></p>	
<p>Support and encourage by providing incentives to both private developers and non-profit housing providers to develop plans for the construction of new affordable and accessible renter-occupied and owner-occupied housing.</p>	<p><b>Complete and Continuing</b> through MPDU program, continued work with LITC housing developers, and financial and technical assistance to the Housing Authority of Annapolis for the redevelopment, repositioning and conversion of public housing properties.</p>
<p>Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter occupied and owner occupied housing that is affordable and accessible to lower income households</p>	<p><b>Complete and Continuing</b> including through our annual commitment of CBDG funding to the Housing Authority of Annapolis (HACA), ongoing weekly progress meetings between the City and HACA, direct coordination between City housing inspectors and HACA maintenance and administration staff, and most recently in 2024, through a \$500,000 City grant to HACA funding</p>

2020 AI Action Item	Status
	the repair and rehabilitation of existing housing units.
<b>Overall Goal 4: Improve approval rates for all originated home mortgage loans.</b>	
Credit history is the greatest reason for denial among all races of households. Debt-to-income ratio is the second highest contributor to denials. <u>Work with lenders</u> and provide resources to assist with reduction of the denial of home mortgage applications based on credit history.	<b>In Progress</b> via Arundel Community Development Services in which education is provided to low income home buyers including mortgage assistance for first time buyers for closing costs. However to the specific point: there has been no work directly with “with lenders”.

## Anne Arundel County Assessment of Past Goals and Actions

2020 AI Goal	Status
<b><i>Increase affordable and workforce rental housing options and opportunities for ownership</i></b>	
<p><b>Goal 1:</b> Invest in the creation of affordable and accessible rental units in Communities of Opportunity, especially in transit zones.</p>	<p><b>Complete and Continuing.</b> The County prioritized the investment of federal HOME funding and County general funds into creating new affordable rental units in Communities of Opportunity and transit zones, recognizing that this often requires developers with developable land and other financing commitments.</p> <p>After successfully analyzing and proposing PILOT legislation in Local Fiscal Year 2022 to provide operating subsidies for four new affordable housing developments that will create, collectively 406 new rental units for families and older adults, the County awarded PILOT agreements to these four projects in Local Fiscal Year 2023. During the past fiscal year, ACDS, on behalf of the County, closed on critical gap financing, utilizing a combination of County HOME, County general funds, and County Housing Trust Fund dollars for five new affordable housing developments. These developments are currently under construction. One of these developments was made possible due to the County's Workforce Housing zoning provision, and one was made possible due to the County's Housing for Elderly of Moderate Means zoning provision.</p>



<p><b>Goal 2:</b> Invest in the preservation of the existing stock of affordable rental units.</p>	<p><b>Complete and Continuing.</b> During Local Fiscal Year 2024, ACDS completed the underwriting process using HOME funds, County Housing Trust Funds and RAD conversion to support the redevelopment of the two Heritage Homes public housing communities owned by the Housing Commission of Anne Arundel County (HCAAC) into the renamed Heritage at Town Center and Heritage at Odenton. The project preserved 182 affordable housing units, two community centers and a library.</p> <p>Also, during Local Fiscal Year 2024, ACDS closed on a loan using HOME funds to support the redevelopment of a public housing property owned by the Housing Authority of the City of Annapolis called Morris Blum Senior Apartments. The project preserves 158 affordable housing units for low-income households, with a preference for households with older adults and/or a disability. Redevelopment is occurring with residents in place and is substantially complete.</p> <p>During FY 2022, the County analyzed and proposed PILOT legislation to provide operating subsidies for the preservation of Villages at Marley Station, a 757-unit affordable housing complex in Glen Burnie that was set to expire in two years and the PILOT legislation was successfully passed in early Local Fiscal Year 2023. The project, which is expected to undergo a refinancing and major renovations, is experiencing a funding gap; therefore ACDS worked with the developer during FY 2024 to analyze the financial gaps and is working with the County to propose an additional PILOT subsidy which is being introduced in early FY 2025; in addition the developer has obtained an equity loan from its parent company and is deferring 100% of its developer fee, while obtaining a larger loan from the State of Maryland. This will allow the project to remain affordable for another 40 years.</p>
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	<p>The County also supported two developments which will benefit the homeless. ACDS closed on financing with HCAAC, utilizing HOME ARP and Housing Trust Fund dollars to rehabilitate the Doll Apartments, which will provide housing to households experiencing homelessness and offer onsite supportive services. ACDS also settled a loan, utilizing County General Funds and Housing Trust Fund dollars, with Arundel House of Hope to acquire and rehabilitate an existing dilapidated rooming house, transforming it into supported transitional housing.</p>
<p><b>Goal 3:</b> As part of the state-required Housing Element of the County's General Plan, include a housing needs analysis that identifies needs and barriers to affordable housing development.</p>	<p><b>Complete.</b> During Local Fiscal Year 2021, the County completed its general development plan, <i>Plan 2040</i>, which included a housing needs analysis and strategies to meet those needs. That plan and analysis continue to guide the County's actions and is resulting in small region planning efforts that began in 2023 and continued into Local Fiscal Year 2024. The small region planning efforts will support the need for potential re-zoning efforts.</p> <p>In Local Fiscal Year 2023, the County administration, having built on the work of the Schools Adequate Public Facility (APF) Committee, developed, and introduced legislation that re-vamped the County's APF policy around schools, while exempting affordable developments from the requirement. The legislation was unanimously passed in early FY 2024 and is expected to make available areas that were previously closed to development for new affordable development opportunities.</p>
<p><b>Goal 4:</b> Work to establish an inclusionary housing ordinance that addresses the housing needs identified. Closely monitor the effect of the ordinance and adjust as needed to ensure it creates housing that is needed by residents in the region.</p>	<p><b>In Progress.</b> During Local Fiscal Year 2023 the County reconvened a workgroup to evaluate and build on the work of a prior Moderately Priced Dwelling Unit (MPDU) stakeholder committee. The Workgroup developed draft legislation to review with stakeholders and a bill was introduced in Local Fiscal Year 2024 which was defeated by a 4-3 Council vote. County Council members subsequently convened a workgroup to address</p>

	<p>some of the land use concerns identified in the original bill and the County administration participated in workgroup sessions to draft legislation that is expected to be introduced to the Council in early FY 2025.</p>
<p><b>Goal 5:</b> Also as part of the General Plan update, include an analysis of opportunities to expand the development envelope where logical for the county to absorb new demand for housing (e.g., near transportation corridors and jobs).</p>	<p><b>Complete.</b> The General Development Plan (GDP), which was completed by Planning and Zoning and introduced/approved by the County Council in Calendar Year 2020, included an analysis of opportunities to expand the development envelope where logical for the County to expand new demand for housing (e.g., near transportation corridors and jobs).</p> <p>The GDP identifies areas for expanded housing development near transportation centers. In addition, through the GDP implementation process, the County has established regional planning committees that are examining the needs and strategies to address the need for affordable units for a range of incomes and putting forward some of these considerations as part of the comprehensive rezoning process. The County is drafting or finalizing the nine County area plans. As part of the regional AI analysis, the Central Maryland Regional Transit Plan and BMC's Baltimore Region Transit Funding and Governance Study will be considered regarding transportation access issues related to housing in the County.</p>
<p><b>Goal 6:</b> Reinstate and support a policy to give first priority for the use of County surplus land - as suitable- for the development of affordable housing serving 0-60 percent AMI renters and 60-100 percent AMI owners.</p>	<p><b>Complete and Continuing.</b> The County regularly gives ACDS and the Housing Commission of Anne Arundel County (HCAAC) the opportunity to obtain County surplus property. Several properties were offered to ACDS and HCAAC during Local Fiscal Year 2024, but none were suitable for affordable housing development.</p>

<p><b>Goal 7:</b> Explore a dedicated funding source for affordable housing creation in opportunity areas and redevelopment in target revitalization areas. Until that fund is established, continue allocating County general fund dollars to support affordable housing development.</p>	<p><b>Complete.</b> During Local Fiscal Year 2024, the County continued to dedicate general funds to affordable housing development, which leveraged local HOME funds and allowed ACDS to support the projects mentioned above and to begin supporting additional projects which are in the conceptual stage and came in for initial conversations or through the pre-application process during Local Fiscal Year 2024.</p> <p>During Local Fiscal Year 2023, enabling legislation went into effect allowing the County to create and fund a local Housing Trust Fund (HTF) and allowed the County Council to create a dedicated revenue source to sustain it. The County made the decision to fund the trust fund in FY 2023 with \$10 million in one-time County general funds, which will be available in subsequent fiscal years as part of the non-lapsing fund. In addition, as part of the County's FY 2023 budget, the County Council approved a modest increase on the real property transfer tax charged by the County on property sales of over \$1 million which will provide an ongoing funding source for the County's HTF. Sales made for the development of affordable housing projects are exempt from the additional tax. Additional funds were made available for the Fund in Local Fiscal Year 2024 through the dedicated revenue source.</p>
<p><b>Goal 8:</b> Adopt Small Area Fair Market Rents (SAFMRs) for housing choice voucher (HCV) program.</p>	<p><b>Complete.</b> The Housing Commission of Anne Arundel County (HCCAAC) continues to use SAFMR's along with exception rents as needed. The requests are submitted to HUD on an annual basis for clients leasing in our area. HCAAC provides Fair Housing training for staff, and has continued to work with and search for partners for resources in the County.</p>

<p><b>Goal 9:</b> Continue and potentially expand housing vouchers created through locally controlled funds that can be used in Opportunity Areas.</p>	<p><b>Complete and Continuing.</b> In Local Fiscal Year 2024, the County expended \$140,706 in HOME funds and \$926,473 in County General Funds for a Tenant Based Rental Assistance Program. The program, called “Moving Home,” provided housing counseling and/or ongoing tenant-based voucher assistance to 63 households who were experiencing homelessness during the year.</p> <p>During Local Fiscal Year 2024, the County continued to use federal Eviction Rental Assistance Program (ERAP) funds as well as County funds to provide eviction prevention and relocation assistance for income eligible renters negatively affected by COVID-19. In Local Fiscal Year 2024, the County prevented the eviction of 911 households, as well as provided legal assistance to 1,733 households comprising 4,242 tenants to help prevent evictions.</p>
<p><b>Goal 10:</b> Continue and expand fee waivers for affordable family housing.</p>	<p><b>Complete and Continuing.</b> In 2019, the County passed an ordinance creating a Workforce Housing conditional zoning provision that allows for residential development in certain commercial, mixed use and light industrial zones, as well as density increases in R-5, R-10 and R-15 zones, in exchange for creating a certain percentage of affordable rental and/or homeownership units. It also allows for a 50 percent reduction in water and sewer fee capital connection costs for projects that meet minimum workforce housing requirements.</p> <p>The County has also continued other policies that waive fees for affordable housing development, including waiving water and sewer fees for development of properties serving elderly persons of modest means and waiving impact fees for affordable housing developed by nonprofit developers for households earning 120% and below AMI.</p> <p>During Local Fiscal Year 2023, the County finalized and recorded the legal documents for Eagle Park, the County's first workforce housing development,</p>

	<p>which will include 120 units of affordable housing for families and older adults in Jessup and the project was able to utilize the fee waiver provision. The project settled in Local Fiscal Year 2024 and began construction. In addition, the County finalized and recorded legal documents for Village at Little Patuxent, an affordable rental community that will create 78 new units for older adults and was made possible through the County's Housing for Elderly of Modest Means zoning provision.</p>
<p><b>Goal 11:</b> Continue and expand resources for case management, housing search assistance and other supportive services to sustainably house low and very low income households.</p>	<p><b>Complete and Continuing.</b> The County will continue to invest County general funds and/or Housing Trust Funds annually into case management and housing location support through the HOME and County funded Moving Home Program, helping secure housing for hard to serve clients and help them access housing in Opportunity Areas.</p> <p>During Local Fiscal Year 2024, the County committed \$397,530 in County general funds for case management through the Moving Home Program. A total of 63 households were provided with housing counseling services and/or began receiving ongoing tenant-based voucher assistance in FY 2024.</p>
<p><b>Goal 12:</b> Explore development of a landlord mitigation program to encourage wider utilization of housing vouchers in Opportunity Areas and among homeless and special needs families.</p>	<p><b>Complete and Continuing.</b> During Local Fiscal Year 2024, as part of its Moving Home Program, ACDS continued its initiative to encourage landlords to enter into an agreement with ACDS to provide rental units to Moving Home participants and, when needed to help secure housing for harder to serve clients, to modify or waive their tenant screening criteria related to rental history, credit ratings, some criminal background elements, etc. In exchange, the Program provides enhanced security deposits and case management to support positive landlord-tenant relationships. ACDS continues to work in partnership with the Maryland Multi-Family Housing Association to encourage landlords to participate.</p>

	<p>During Local Fiscal Year 2023, ACDS contracted with the Equal Rights Center (ERC) to conduct fair housing testing with an emphasis on testing for source of income discrimination against prospective tenants with vouchers and discrimination based on disabilities, race and ethnicity. Throughout Local Fiscal Year 2024, the ERC conducted 70 fair housing tests by telephone and in person throughout the County, providing a full report and a presentation for the Human Relations Commission and the public regarding its findings. In Local Fiscal Year 2025, the County will use the findings to guide the development and presentation of a Fair Housing Outreach and Education Webinar Series designed to prevent and combat housing discrimination that is a barrier to housing for low-income persons and those with special needs.</p>
<p><b>Goal 13:</b> Invest in credit counseling, first time homebuyer counseling and foreclosure prevention counseling to support and increase sustainable homeownership among the protected classes and promote access to better and sustainable rental housing for renters.</p>	<p><b>Complete and Continuing.</b> Anne Arundel County invests at least \$400,000 annually to support counseling programs that serve over 600 clients per year. ACDS provides counseling services and markets these programs to the protected classes.</p> <p>During Local Fiscal Year 2024, ACDS sponsored and held a community-wide Housing Resource Fair, bringing together housing industry professionals, housing counselors, fair housing experts, legal providers, and other community resources to provide informational sessions on home buying for County residents. Marketing for the event was targeted to underserved communities and protected classes and the event was attended by more than 150 diverse County residents.</p> <p>During Local Fiscal Year 2024, the County expended \$527,716 serving 722 individuals through the Homeownership Counseling Program and 30 individuals through the Financial Literacy Program. The County funded Foreclosure Prevention Counseling Program served 232 beneficiaries during the fiscal year. ACDS applied for and was awarded competitive State funding to</p>

	<p>provide foreclosure prevention counseling and refer struggling homeowners to the State's financial assistance Program.</p> <p>Of those reporting race for these programs, 557 were identified as Black and 42 identified as Hispanic.</p>
<p><b>Goal 14:</b> Investigate why there are disparities in minority homeownership rates and develop policies to address those disparities.</p>	<p><b>Complete and Continuing.</b> "Tangled Title" results when a homeowner does not have clear title to their home, often because of the home passing down through generations without proper estate processing to transfer title from the titled owner to the successor family member in the home.</p> <p>The lack of clear title prevents the resident from getting loans to pay taxes or make repairs on the property and prevents the resident from getting available tax credits and other benefits of homeownership. In Local Fiscal Year 2024, ACDS and the County sponsored a "Tangled Title" legal clinic that provided critical legal assistance to 25 homeowners with issues related to having clear title to their homes, helping them to plan for clearing title to their homes.</p> <p>Working with partners at the regional level in Local Fiscal Year 2024, ACDS participated in meetings that included developing priority strategies for reducing homeownership gaps, hearing from banks on special purpose credit programs to address Black and Latino homeownership, hearing from real estate experts about the housing shortage in the Baltimore region, hearing from Prince George's County regarding their preservation-oriented right of first refusal in sales of multifamily properties, regular convening of Preservation Task Force (including learning about similar efforts currently in place in Detroit and Washington, DC), learning about new Maryland DHCD report on racial disparities in Maryland real estate, and learning about how Anne Arundel and</p>



	Howard Counties have addressed housing in their comprehensive planning processes.
<b>Goal 15:</b> Explore partnerships with area hospitals and health providers to support both affordable housing and the needed support services for our special needs populations.	<p><b>Complete.</b> ACDS added hospitals to its list of housing and community development stakeholders and solicited feedback on housing/health needs for the last Consolidated Plan and Action Plans. ACDS will initiate meetings with Anne Arundel Medical Center and University of Maryland Baltimore Washington Medical Center as part of the next Community Needs Assessment.</p> <p>ACDS added hospitals and health stakeholders to its Community Stakeholder list and included them in outreach and informational communications throughout Local Fiscal Year 2024. As the County's housing agency, ACDS is also participating in the Department of Health's Needs Assessment.</p>
<b>Goal 16:</b> Enforce the County's new fair housing ordinance, which includes a source of income provision.	<p><b>Complete and Continuing.</b> During Local Fiscal Year 2021, the County completed appointments to the Human Relations Commission with qualified candidates and hired a new Human Relations Officer. During FY 2022, the Human Relations Officer focused on: (1) developing procedures for investigating and acting in response to Fair Housing complaints; (2) developing partnerships with State and local agencies that will support enforcement of the County's Fair Housing laws; and (3) developing and facilitating access to outreach and educational materials about Fair Housing laws. During FY 2023, the Human Relations Officer worked closely with ACDS to complement the work of the Human Relations Commission and took an active role on the Baltimore Metropolitan Council's Fair Housing Committee.</p>

	<p>Fair Housing Paired Testing for discrimination in housing matters is an effective tool for rooting out discrimination in housing. In FY 2023, the County contracted with the Equal Rights Center, experts in conducting tests for housing discrimination, to conduct a series of “Audit Testing” in the County to identify the extent and type(s) of discrimination in the County so a plan of action could be developed. Fifty (50) tests focusing on disability and source of income discrimination were conducted. The County expanded the testing program to include an additional 20 in-person tests for evidence of racial and ethnic discrimination.</p> <p>The results of the audit testing were included in a report which was presented to the Human Relations Commission and the public in FY2024 and are being used to guide topics for a 6-session Fair Housing webinar series in FY2025 that will educate the public and housing providers regarding the County’s fair housing laws, including resident rights and housing provider responsibilities.</p> <p>With its partners in BMC’s regional fair housing committee, the County engaged in meetings throughout FY 2024 with the Maryland Commission on Civil Rights, charged with enforcing the state’s fair housing laws at the state level. The goal of the ongoing meetings is to maintain open lines of communication to ensure the best use of resources for enforcement and education regarding fair housing laws. ACDS also attended meetings in which the State Attorney General explained the AG’s commitment to enforcement of state civil rights laws under new state enabling legislation and the County will continue to monitor that office as a resource for ensuring fair housing laws are followed.</p>
<b><i>Address barriers to equalizing access to opportunity</i></b>	

<p><b>Goal 17:</b> Continue to invest County and federal resources into neighborhood revitalization areas, including, but not limited to, residential revitalization programs, public services and transportation, developing or redeveloping public facilities, and providing financial coaching/counseling.</p>	<p><b>Complete and Continuing.</b> During Local Fiscal Year 2024, the County continued to invest funds into these Neighborhood Revitalization Areas, including after school programs, acquisition and rehabilitation of dilapidated units, and completion of construction of the new Severn Center, an intergenerational facility serving low-income communities in Severn. The Severn Center began serving youth, seniors, and the community in Local Fiscal Year 2024.</p> <p>The County also began renovations of the community center which serves Heritage at Severn (formally Meade Village Public Housing Community).</p> <p>In addition, ACDS, on behalf of the County, completed underwriting for the comprehensive redevelopment and preservation of three public housing projects: (1) Heritage Homes, which includes the Housing Commission of Anne Arundel County's (HCAAC) RAD conversion of Glen Square and Stoney Hill, totaling 182 units serving low and moderate-income seniors and persons with disabilities; and (2) Morris Blum, 154 units of affordable housing currently owned by the Housing Authority, City of Annapolis (HACA) serving low-income residents, with a preference for seniors and persons with disabilities. Financing for Morris Blum, which includes a \$1.2 million HOME loan, closed in early Local Fiscal Year 2024; financing for Heritage Homes, which includes \$1.5 million in County Affordable Housing Trust Fund and HOME funds, closed and began construction in Local Fiscal Year 2024.</p> <p>In Local Fiscal Year 2024, the County expended 32 percent of all CDBG, HOME, and County funds into the Severn, Brooklyn Park, and Glen Burnie communities as well as preservation of older affordable housing communities.</p>
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<p><b>Goal 18:</b> Implement equity framework in public resource allocation decision making. Allocation of resources should result in an equitable approach to bring neighborhoods into similar standards of service delivery and amenities.</p>	<p><b>Complete and Continuing.</b> The County created a new Director of Equity, Diversity, and Inclusion position in 2021 and filled that position with an experienced civil rights professional who has since been working with the Budget Office and other County departments as well as ACDS to implement an equity framework across government agencies and budgeting decisions.</p> <p>Late in Local Fiscal Year 2023, the County Executive built on earlier efforts to implement an equity framework in the County by creating an Office of Equity and Human Rights within the County Executive’s administration and appointing the Director of Equity, Diversity, and Inclusion to run the office. One goal of the Office of Equity and Human Rights is to ensure the implementation of an equity framework in policy and budget decisions across all neighborhoods and populations in the County.</p>
<p><b><i>Expand fair housing resources and compliance</i></b></p>	
<p><b>Goal 19:</b> Support fair housing testing, Language Access Planning, diversity in housing and planning boards, investigating housing discrimination, and collaborative efforts with local and regional stakeholders.</p>	<p><b>Complete and Continuing.</b> ACDS contracted with the Equal Rights Center in Local Fiscal Year 2023 to conduct a series of 50 fair housing tests in the County to get a baseline assessment of the state of housing discrimination in the County. The testing program expanded in Local Fiscal Year 2024 and the results form the basis for the development of a new fair housing education and outreach webinar series sponsored by the County’s Office on Equity and Human Rights. Throughout Local Fiscal Year 2024, the Human Relations Commission continued to investigate discrimination complaints and developed relationships with local organizations and legal services providers that assist in identifying and pursuing Fair Housing complaints where warranted.</p> <p>During Local Fiscal Year 2024, ACDS legal staff provided training for the Anne Arundel County Continuum of Care to ensure awareness and</p>

	<p>understanding of Fair Housing issues facing CoC clients and related fair housing laws.</p> <p>The County supported statewide legislation that would have allowed a carve-out from the State's two-party consent requirement for recording conversations so that fair housing testing can be conducted as it is conducted by HUD and the Department of Justice. Allowing testers to record their conversations with housing providers would make fair housing testing a much more effective tool for combatting housing discrimination in Maryland. The legislation did not pass in the FY2024 legislative session, but it will be returned in FY2025. ACDS, the County and its regional partners will again support the legislation.</p>
<b><i>Expand fair housing choice for persons with disabilities.</i></b>	
<p><b>Goal 20:</b> Create a home/apartment accessibility modification program to serve low income renters with disabilities. Continue the existing program that serves homeowners.</p>	<p><b>Complete.</b> Funding was allocated and policies and procedures for this program were established during Local Fiscal Year 2020.</p> <p>During Local Fiscal Year 2024, ACDS completed five accessibility modifications for income eligible homeowners.</p>

## City of Baltimore Assessment of Past Goals and Actions

2020 AI Action Item	Status
<b><i>Goal 1: Create new affordable housing opportunities.</i></b>	
Production of new publicly subsidized affordable rental housing across a range of geographies, including opportunity area census tracts and non-opportunity areas where the development activity will have a significant revitalizing impact on the area.	<p><b>In Progress.</b> In the last 4 fiscal years, among the following funding sources, the City has cumulatively produced 963 units: HABC units - 359, CDBG - 37, HOME, 591.</p> <p>In FY2025, HABC projects the following 1,092 units to come online: Arbor Oaks, Carey, Laurens House, McCulloh Homes, O'Donnell Heights, Renaissance at Reservoir Hill, Sharp Leadenhall, Townes at the Terraces.</p>
Reform the Inclusionary Housing Law (IHL) so that it more effectively produces affordable housing opportunities.	<p><b>Complete and Continuing.</b> After an extensive and in depth analysis of the existing Inclusionary Housing Law, DHCD, in partnership with the Mayor's Office and City Council passed a new Inclusionary Housing Ordinance on 12/4/2023. It was enacted on 1/22/2024 and went into effect on 7/21/2024. Detailed information on the status of the implementation is available at <a href="http://baltimore.legistar.com">baltimore.legistar.com</a> as part of the bill file for 24-0230R (Attachment labeled "DHCD Presentation 24-0230R").</p>
Continue using HOME Investment Partnerships Program, Low Income Housing Tax Credits and other City of Baltimore and Housing Authority of Baltimore City resources in the production wheelchair accessible affordable housing for persons with disabilities in excess of the minimum amount required by federal regulation to replace UFAS units lost from the affordable housing inventory.	<p><b>Complete and Continuing.</b> The City is meeting this requirement. In some instances, we are exceeding this requirement. For the Perkins Somerset Oldtown Project - 12% of all units will be accessible. There are 1,651 units projected, with the following available data: 169 UFAS commitment, 178 UFAS units planned, 27 Visual and Hearings unit commitment, 38 planned.</p>

2020 AI Action Item	Status
Continue to foster homeownership opportunities for under-represented households.	<p><b>Complete.</b> According to CFY actuals 2020 through 2023 - available in the FY2025 budget book - DHCD assisted 853 households, putting the agency on track for its 5 year goal.</p> <p>HABC has helped 49 participants in the HCV Program achieve homeownership between January 12, 2019, and October 30, 2024.</p> <p>Currently, HABC has six (6) additional HCV participants under contract who are scheduled to go to settlement by the end of December 2024. We also have three (3) HCV participants actively searching for a home.</p> <p>Additionally, we expect to enroll four (4) more HCV participants in the next two months to initiate their housing search.</p>
Design and implement requirements governing mixed income tenancy in new developments receiving City financial support.	<p><b>In Progress.</b> Five weeks after the new Inclusionary Law was approved, City DHCD began drafting new rules and regulations. On 6/28/24, DHCD held its first meeting with the Baltimore Development Workgroup Program Manual Focus Group. From 8/15/2024 - 9/15/2024 the draft rules and regulations were posted for public comment. Detailed information on the status of the implementation is available at <a href="http://baltimore.legistar.com">baltimore.legistar.com</a> as part of the bill file for 24-0230R (Attachment labeled "DHCD Presentation 24-0230R").</p>
Continue to support homeownership counseling, both purchase and default, for under-represented households.	<p><b>Complete and Continuing.</b> Over the course of four CFYs, through 2024, DHCD provided housing counseling to 16,456 households. This activity is still funded through CDBG funding.</p>
Implement a Healthy Opportunities Program ("HOP"), which will be a mobility program that will assist families with children who are currently participants in HABC and where one or more family member has a medical condition, such as asthma, that is exacerbated by environmental factors. Housing and health-care providers will	<p><b>Complete and Continuing.</b> HABC's HCVP partnered with BRHP in 2021 to establish the Healthy Children's Voucher Demonstration which uses HCVP's Healthy Opportunities Program vouchers to assist referred families with children who have urgent medical needs and need to relocate to healthier environments.</p> <p>Currently, HABC and BRHP work with the 9 community health partners who make those referrals.</p>

2020 AI Action Item	Status
collaborate to provide stable, affordable and healthy housing in opportunity areas with the goal of improving participants' health outcomes and overall quality of life.	HABC has received 65 referrals from BRHP for the Healthy Children Voucher Demonstration Program. Only 45 of the 65 referrals were eligible as they possess a housing choice voucher issued by HABC. To date 18 of these families have been issued a voucher to locate housing by HABC with BRHP Mobility Counseling. Out of the 18 vouchers issued, 15 families have leased a unit, 2 families have ported to another jurisdiction to locate housing and 1 voucher expired.
Assist persons with disabilities in leasing units with the 27 Mainstream vouchers HABC received under the CARES Act	<b>Complete.</b> All 27 Mainstream CARES Act vouchers were issued by 7/30/2021.
If HUD issues a NOFA for Mainstream vouchers, HABC will consider applying for the vouchers depending on whether HABC is eligible and the NOFA requirements.	<b>Complete.</b> The initial award received in 2018 from HUD was for 89 vouchers, in 2020 they awarded 27 CARES Act vouchers, for a total of 116 vouchers.
<b>Goal 2: Promote affirmative fair housing marketing.</b>	
Ensure that HOME funded developers create and implement meaningful affirmative marketing plans	<b>Complete.</b> HOME agreement language has clearly requirements for grantors, including annual checks for marketing review compliance.



2020 AI Action Item	Status
<b>Goal 3: Preserve existing affordable housing.</b>	
Preservation of existing publicly subsidized affordable rental housing in any area in which improvements will significantly extend the amount of time housing units will remain a viable part of the city's publicly subsidized affordable housing inventory.	<b>In Progress.</b> Total RAD units preserved during the Fair Housing Plan time period = 4,094 Additions anticipated in 2025 = 1,092
<p>In housing markets that are experiencing, or likely to experience, demographic changes that will significantly erode the availability of unassisted affordable rental and for-sale housing:</p> <ol style="list-style-type: none"> <li>1. Design and implement, initially on a pilot basis, a program to preserve affordable rental housing.</li> <li>2. Assist existing homeowners remain in their homes.</li> </ol>	<b>Complete.</b> DHCD implemented a pilot program to preserve affordability on a target "whole block" rehab project known as the Upton Gateway. DHCD acquired 28 vacant properties on the 800 block of Edmondson. Of those, 25 were rehabbed and 3 were demolished and turned into community green space. Of the 25 rehabbed vacants, at least 1/3 of the home buyers received significant down payment assistance to purchase their homes. Moreover, DHCD partnered with the Upton Planning Commission to market these homes to existing residents of the community who were previously renters. Finally, the legacy homeowners on the block were given home repair grants so they could remain in their homes on the block and benefit from the city and private investment. The work on this block will be replicated as the City implements its \$3B Vacants Reduction Plan.
<b>Goal 4: Support racially integrated communities.</b>	

2020 AI Action Item	Status
Define and identify such areas and analyze and report on their social and physical characteristics.	<b>Incomplete.</b> During the implementation period, the DHCD Research & Analytics team went through a restructuring that prevented the this goal from being completed.
As appropriate, design and implementation of strategies that will strengthen these areas and maintain and improve their racial integration.	<b>Complete and Continuing.</b> In CY2020, DHCD completed its 5-year consolidated plan, which for the first time identified geographic areas of focus, known as the Impact Investment Areas. To continue to monitor progress on its investment work, DHCD's Research & Analytics team have created a number of publicly available data tools to track investment progress - in addition to CoDeMap. That research gallery is available online.
<b><i>Goal 5: Improve community planning, support, and coordination.</i></b>	
Work with the Baltimore City Department of Planning to support residents in all types of communities in creating comprehensive, transformative revitalization plans focused on development without displacement.	<b>Complete and Continuing.</b> DHCD and DOP worked with community partners - from CDCs to neighborhood organizations - to draft strategic implementation plans for all Impact Investment Areas outlined in the City's Framework for Community Development. These plans will continue to be refined as the City implements its 15-year \$3B Vacants Reduction Plan.
As part of such plans, support a wide range of viable community-based affordability preservation and wealth-building tools, such as community land trusts, tax credits, housing counseling, and homeownership incentives, where appropriate.	<b>Complete and Continuing.</b> Since FY21, DHCD, through the Affordable Housing Trust Fund, has allocated \$22.8M to Community Land Trust Projects, \$6.2M for rent supplement support, and \$9.3M for senior homeownership support.

2020 AI Action Item	Status
Work with other City and quasi-City agencies (e.g. Police Department, Safe Streets, Health Department, Baltimore Development Corporation, Housing Authority of Baltimore City, Mayor's Office of Employment Development) to coordinate investments and activities so that community revitalization efforts include improved education, public safety (including consistent, constitutional policing and violence interrupter activity), public health, and economic opportunities.	<b>Complete and Continuing.</b> Since August 2021, the Mayor's Neighborhood Subcabinet brings together more than 15 key partner agencies in the community development process once a month.
<b><i>Goal 6: Support fair housing access and expand resources and compliance in the City.</i></b>	
Support creation of a fair housing agency that will conduct fair housing testing and training, investigate housing discrimination and pursue fair housing claims.	<b>In Progress.</b> DHCD funds fair housing testing through its CDBG funds and will continue to advocate wherever appropriate for a separate fair housing agency dedicated to affirmatively furthering fair housing. Moreover, in the last five years, DHCD has expanded its ombudsman office and partnered with the Department of Finance to expand City offerings that assist homeowners and renter with direct cash assistance to avoid foreclosure and eviction respectively.
Continue implementation of Language Access Planning.	<b>Complete and Continuing.</b>
Create a partnership between the DHCD, HABC, Department of Planning, Health Department, Maryland Commission on Civil Rights, and the Office of Equity and Civil Rights, the City's fair housing compliance agency.	<b>Incomplete.</b> As a result of staff shortages, OECR could not complete this action step. However, OECR plans to continue to explore creating this partnership.

2020 AI Action Item	Status
Continue to enforce Article IV of the Baltimore City Code, the City's fair housing law by investigating fair housing complaints.	<p><b>Complete and Continuing.</b> In FY 20, OECR staff received 92 housing inquiries, 76 of which were referred to other resources.</p> <p>As a result of staff shortages, OECR could not complete parts of this action step. OECR was unable to investigate 20 complaints of discrimination per year but has accepted new investigations.</p>
Continue to apply for HUD FHIP-EOI Funding.	<p><b>Incomplete.</b> As a result of staff shortages, OECR could not continue to apply for HUD FHIP-EOI Funding.</p>
Implement a comprehensive Fair Housing Education and Outreach training program.	<p><b>In Progress.</b> Staff attended a total of 54 community events over the course of FY20. A total of 17,358 individuals attending the 54 events, including residents and housing professionals.</p> <p>As a result of staff shortages, OECR could not continue to apply for HUD FHIP-EOI Funding. However, in FY 21, FY 22 and FY 23, OECR staff conducted approximately 20 community engagement events or community trainings.</p>
Provide educational fair housing literature to residents.	<p><b>In Progress.</b> As a result of staff shortages, OECR could not create an outreach plan for voucher holders, landlords and housing professionals. However, OECR and HABC have partnered at multiple events to provide fair housing education to residents at HABC properties.</p>
Address language access in fair housing education	<p><b>Complete and Continuing.</b> OECR staff conducted approximately 40 trainings.</p> <p>OECR also created topic specific brochures in Spanish, Mandarin, Korean, French and Arabic as well as Braille.</p>
Address accessibility in fair housing education	<p><b>Complete and Continuing.</b> OECR created virtual fair housing educational videos in posted on the agency's Facebook and YouTube pages. OECR was able to create a fair housing friendly lease in English, Spanish, Chinese and French that is accessible to landlords for free on OECR's website and Baltimore City's Department of Housing and Community Development website.</p>

2020 AI Action Item	Status
Provide education around the City's Source of Income Protections	<p><b>In Progress.</b> As a result of staff shortages, OECR could not create an outreach plan for voucher holders, landlords and housing professionals. However, OECR and HABC have partnered at multiple events to provide fair housing education to residents at HABC properties.</p> <p>HABC provides information to prospective landlords in its monthly New Landlord Briefings.</p>
Explore amending Article 4 of the Baltimore City Code to be substantially equivalent to the Fair Housing Act	<p><b>In Progress.</b> OECR has supported an amendment to Article 4 to extend the timeframe to file a complaint from 180 days to 300 days.</p>
Explore amending Article 4 to require landlords and housing professionals to accept TIN#s in the place of SSN	<p><b>In Progress.</b> As a result of staff shortages, OECR could not complete this action step. However, OECR has supported an amendment to Article 4 to extend the timeframe to file a complaint from 180 days to 300 days.</p>

## Baltimore County Assessment of Past Goals and Actions

2020 AI Task	Status
<b><i>Goal 1: Establish over-arching fair housing policy to establish a foundation for affirmatively furthering fair housing.</i></b>	
<b>Task 1:</b> Ensure that there is a statement of policy in Master Plan 2020 and the Zoning Regulations that clearly articulates the County's commitment to expanding fair housing choice.	<b>Complete.</b> Appropriate language was added to the County's Master Plan 2030.
<b>Task 2:</b> Incorporate AFFH principles, including provisions to expand the locations available to multi-family housing, into any future substantial revisions to the zoning map.	<b>Complete.</b> Throughout the Master Plan 2030 and Comprehensive Zoning Map Process, efforts were made to include AFFH principles.
<b>Task 3:</b> Adopt an inclusionary housing ordinance that can be incorporated into the County's development codes.	<b>Complete.</b> The County Executive issued an Executive Order in December 2024 that requires development projects requesting certain forms of public assistance to include 20% of its units as affordable at certain AMI levels.
<b>Task 4:</b> Revise policy priorities for the investment of HOME and CDBG funds to promote projects involving rental housing for families on sites outside of racially/ethnically concentrated areas.	<b>Complete.</b> Policies were revised to accommodate this priority.
<b>Task 5:</b> Track data showing the number of attainable housing created by household type (senior, family, large family, accessible) and by areas of opportunity and areas of racial and ethnic concentrations. To the extent possible, monitor occupancy of assisted units by protected class.	<b>Complete.</b> DHCD has advanced its tracking of attainable housing data through tools like the Opportunity Moves Report and mapping efforts. Demographic and accessibility data collection is ongoing to ensure alignment with mobility goals and VCA requirements. While foundational processes are established, continued efforts to engage landlords and tenants will address remaining data gaps and support sustained compliance.

2020 AI Task	Status
<p><b>Task 6:</b> Prioritize for participation in the Mobility Counseling Program, HCV applicants and participants who are families residing in census tracts that have been identified as areas of African American racial concentration in the County's 2011 Analysis of Impediments and the 2019 Regional Assessment of Fair Housing.</p>	<p><b>Complete and Continuing.</b> The Mobility program is open to all voucher recipients and all such recipients may enroll in the Mobility program. A preference or priority is not required as the program is open to all. Families residing in census tracts that have been identified as areas of African-American racial concentration are a targeted group the program is marketed to.</p>
<p><b>Task 7:</b> Reduce barriers to development or financial assistance for workforce and attainable housing developers.</p>	<p><b>Complete.</b> The County has created a Housing Opportunity Fund and adopted other tools such as expedited review and applications for fee waivers to help incentivize affordable development and remove barriers.</p>
<p><b><i>Goal 2: Amend policy and program documents to affirmatively further fair housing.</i></b></p>	
<p><b>Task 1:</b> Revise the County's HOME policies to remove potential impediments to the creation of rental units in non-concentrated areas, particularly the requirement that developers acquire assistance.</p>	<p><b>Complete.</b></p>
<p><b>Task 2:</b> Revise a written policy that encompasses the Site and Neighborhood Selection requirements at 24 CFR 983.6 (Project-Based HUD VASH vouchers), incorporate these requirements into the County's HOME written agreements, distribute as part of application package.</p>	<p><b>Complete.</b> The County incorporated these requirements into the County's HOME written agreements and distributed them as part of the developers application package.</p>

2020 AI Task	Status
<p><b>Task 3:</b> Amend the affirmative marketing standards so that the County is responsible to devise the standards by which the effectiveness of affirmative marketing efforts for each project will be judged.</p>	<p><b>Complete.</b> In accordance with the regulations of the Department of Housing and Urban Development (HUD), and in furtherance of Baltimore County's commitment to non-discrimination and equal opportunity in housing, DHCD has developed a standard for the development of attainable housing in its 2017 Affirmative Fair Housing Marketing Plan. Also, certain Baltimore County-funded development projects are required to submit a Conciliation Agreement Marketing Plan (CAMP) that must be reviewed and approved by HUD FHEO. After which 30 days of affirmative marketing must take place prior to leasing.</p>
<p><b><i>Goal 3: Increase access to County programs for persons with limited English proficiency</i></b></p>	
<p><b>Task 1:</b> Complete four-factor analysis of needs and language access plan according to HUD's LEP guidance.</p>	<p><b>In Progress.</b> DHCD continues to take reasonable steps to ensure meaningful access to LEP persons per HUD guidance.</p>
<p><b>Task 2:</b> Update the Section 8 Administrative Plan to include the policy determinations resulting from the four-factor analysis.</p>	<p><b>Complete.</b> The Office of Housing's Administrative Plan includes policy determination derived from the four-factor analysis.</p>
<p><b>Task 3:</b> Continue to provide language services (interpreters, translators, etc.) on an as-needed basis.</p>	<p><b>In Progress.</b> DHCD is taking reasonable steps to ensure meaningful access to LEP persons per HUD guidance.</p>
<p><b><i>Goal 4: Ensure that members of the protected classes are represented on housing-related boards and commissions.</i></b></p>	



2020 AI Task	Status
<b>Task 1:</b> Survey current board members on a voluntary basis to document race, gender, ethnicity and disability status.	<b>Complete and Continuing.</b> The Department of Social Services Board is comprised of members of protected classes and continues to affirmatively recruit members of the protected classes.
<b>Task 2:</b> Affirmatively recruit protected class members to fill vacancies on appointed boards and commissions.	<b>Complete and Continuing.</b> The Commission on Disabilities and Human Relations Committee continue to affirmatively recruit members of protected classes.
<b>Task 3:</b> Encourage the Greater Baltimore Board of Realtors to ensure that local Realtors reflect the County's diversity by encouraging the board to maintain data demonstrating the number of Realtors who are members of the protected classes.	<b>Complete.</b>
<b>Goal 5: Increase the supply of housing attainable to households below 80% MHI, specifically in opportunity areas.</b>	
<b>Task 1:</b> Increase the Section 8 payment standard for higher-cost areas in the County as a means of expanding fair housing choice outside of racially/ethnically concentrated area.	<b>Complete.</b> The Office of Housing used higher payment standards for Baltimore County's high-opportunity areas 2021-2023.
<b>Task 2:</b> Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in areas of opportunity.	<b>Complete.</b> The County recently passed legislation to eliminate impact fees for attainable housing projects.
<b>Goal 6: Expand the availability of housing options for persons with disabilities.</b>	

2020 AI Task	Status
<b>Task 1:</b> Devise means of more effectively publicizing the policy to increase the voucher payment standard for landlords who are willing to create accessible units.	<b>In Progress.</b>
<b>Task 2:</b> Partner with regional attainable housing developers to increase the supply of accessible housing outside of racially/ethnically concentrated areas.	<b>In Progress.</b> Since 2016 Baltimore County has worked with several attainable housing developers to assist with the creation of accessible housing units in areas of opportunity. Including Project Based Voucher opportunities to facilitate development of new units or substantial rehabilitation of scattered site units.
<b>Task 3:</b> Maintain a current list of landlords with accessible units to offer a high level of assistance to persons with disabilities.	<b>In Progress.</b> Office of Housing continues to recruit landlords that have accessible housing. Housing Search Specialist work directly with families to identify their specific housing needs.
<b><i>Goal 7: Improve the existing process for receiving, investigating and recording housing discrimination complaints.</i></b>	
<b>Task 1:</b> Expand the protections of Article 29 to prohibit discrimination on the bases of familial status and sexual orientation in order to achieve consistency with Maryland's fair housing law.	<b>Complete.</b> In 2012, Baltimore County Executive enacted legislation that added gender identity and sexual orientation to the county's existing anti-discrimination laws. In November 2019, the Source of Income legislation, known as the "Home Act", was successfully passed, expanding Article 29 of the Human Relations Code for Baltimore County.
<b>Task 2:</b> Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents and real estate agents.	<b>Complete and Continuing.</b> Since 2017 Baltimore County has and continues to fund qualified fair housing enforcement organization as vendors that provide fair housing services in the form of outreach and training geared towards housing industry professionals.
<b><i>Goal 8: Mitigate the extent to which mortgage loan denials and high-cost lending disproportionately affect minorities.</i></b>	

2020 AI Task	Status
<b>Task 1:</b> Continue to engage HUD-certified counselors to target credit repair education through advocacy organizations that work with minority populations.	<b>Complete and Continuing.</b> Credit repair education has been implemented in our ongoing contracts with HUD Certified Housing Counseling organizations contracted to provide housing counseling services.
<b>Task 2:</b> Continue to facilitate home ownership education and outreach with particular attention to members of the protected classes.	<b>Complete and Continuing.</b> The County continues to facilitate education and outreach to home owners, home buyers and renters utilizing accessible venues and providing accessible materials for members of protected classes. These efforts continue to be reported in the County's CAPER.
<b>Task 3:</b> Determine whether a local agency exists that has the capacity to provide mortgage lending testing on the basis of race.	<b>Complete.</b> Since 2016 Baltimore County has and continues to fund qualified fair housing enforcement organizations as vendors that provide testing on the basis of protected classes in the areas of rentals, sales and mortgage lending; and additional fair housing services in the form of outreach, training, intake of complaints and referrals and tenant advocacy services.

## Harford County Assessment of Past Goals and Actions

Harford County continues to work both locally and regionally to improve public opinion and public policy, both of which create barriers to affordable housing.

2020 AI Goal	Status
<b><i>Enhance regional fair housing capacity</i></b>	
<b>Goal 1:</b> Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of the Fair Housing Action Center of Maryland.	<b>Completed and Continuing</b> Harford County contracts with the Equal Rights Center of MD to conduct fair housing testing and works closely with the Harford County Human Relations Commission to educate the community and conduct outreach. Harford County works with regional partners through the Baltimore Fair Housing Work Group to grow capacity of the Fair Housing Action Center of Maryland.
<b><i>Address barriers to equalizing access to opportunity</i></b>	
<b>Goal 2:</b> Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units.	<b>Complete and Continuing.</b> Harford County directs a majority of its CDBG funding to support revitalization activity in the underserved communities along the Route 40 corridor. Projects include infrastructure repair, affordable housing projects, public service, and public improvements.
<b>Goal 3:</b> Continue to fund affordable housing for families, primarily in opportunity areas.	<b>Complete and Continuing.</b> Harford County continues to provide HOME funding for multi-family rental and homebuyer projects whenever practicable. Harford County supported fifteen homebuyer projects in partnership with Habitat for Humanity and funded fourteen households with tenant based rental assistance.
<b><i>Increase ownership opportunities for under-represented households</i></b>	
<b>Goal 4:</b> Continue to foster opportunities for homeownership throughout the County including housing counseling and down payment assistance for first time homebuyers.	<b>Complete and Continuing.</b> Harford County is a HUD-certified housing counseling agency that provides a wide array of housing counseling services at no-charge. Harford County provides up to \$20,000 in down payment assistance to income-qualifying first time homebuyers.

<b><i>Increase rental housing options</i></b>	
<b>Goal 5:</b> Explore increased FMRs and/or increased exception payment standards and provide mobility counseling to encourage voucher location in areas of opportunity.	<b>In progress.</b> Harford County periodically reevaluates current FMRs and payment standards to ensure that voucher holders are able to lease up in a timely fashion. Mobility counseling is offered to all voucher holders and individuals are encouraged to look for rentals in areas of opportunity.
<b>Goal 6:</b> Promote Family Self-Sufficiency (FSS) program and connect clients with transportation and employment opportunities.	<b>Complete and Continuing.</b> Harford County has a robust FSS program that connects clients with transportation and employment opportunities. Graduates of the program leave with an average of \$5,000 in escrowed accrued rental assistance payments with one recent graduate receiving \$36,000 at program completion.

## Howard County Assessment of Past Goals and Tasks

2020 AI Goal	Status
<b><i>Increase rental housing options</i></b>	
<b>Goal 1:</b> Explore existing County policies that may inhibit the creation of affordable housing, such as County Bill 18-2014.	<b>Complete.</b> The Housing Opportunities Master Plan was completed in April 2021. Implementation of the 80 recommendations in the plan is ongoing.
<b>Goal 2:</b> Open up new land use opportunities through zoning changes (e.g. commercial and industrial zones could allow affordable units) and/or donated land.	<b>In progress.</b> HoCo by Design, the County's General Plan, was adopted in 2023. Implementation of recommended actions has started.
<b>Goal 3:</b> Continue or increase funding for creating units and/or subsidizing tenant rents in opportunity areas. (e.g. dedicated funding source for affordable housing).	<b>Complete and Continuing.</b> The County has provided gap financing and payment-in-lieu-of-taxes (PILOT) agreements to advance the construction of affordable rental housing opportunities.
<b>Goal 4:</b> Explore increased FMRs and/or Increased exception payment standards and provide mobility counseling to encourage voucher location in Opportunity Areas.	<b>Complete.</b> The Housing Commission will continue to monitor payment standards and rents to ensure that voucher holders have as much geographic choice as possible.
<b>Goal 5:</b> Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that: <ul style="list-style-type: none"> <li>a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low-income population.</li> <li>b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining</li> </ul>	<b>Complete and Continuing.</b> BMC has helped the Regional Fair Housing Group monitor MD DHCD's LIHTC awards and continues to advocate for more awards in areas of opportunity in the Baltimore Metropolitan Region.

2020 AI Goal	Status
awards in comprehensive revitalization areas.	
<b><i>Expand fair housing resources and compliance</i></b>	
<b>Goal 6:</b> Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of the Fair Housing Action Center of Maryland.	<b>In Progress.</b> Howard County supports the regional fair housing testing efforts by Economic Action Maryland (EAM), formerly the Fair Housing Action Center of Maryland. The County's efforts to complete fair housing testing were interrupted by the COVID-19 pandemic. It was challenging for testers to physically visit rental housing communities. Howard County is making plans to resume testing in 2025.
<b><i>Address barriers to equalizing access to opportunity</i></b>	
<b>Goal 7:</b> Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units, especially in areas along transportation routes.	<b>Complete.</b> The Howard County Council adopted CB22-2021 requiring the developer of a TOD (Transit Oriented Development) District site to provide the required moderate income housing units, disability income housing units, or low-income housing units on the TOD site and prohibiting certain actions by the developer relating to optional methods at a different location or alternative compliance to optional methods. Howard County revised the Loan Rehabilitation Program in 2024 to add a grant option, a loan forgiveness provision and reduce the loan interest rate for low-income homeowners. The program also increased the amount of funding to \$50,000 per unit. The County also partnered with the Howard County Housing Commission, which exercised its Right of First Refusal authority, to acquire two existing rental housing communities. The County provided grant funding to the Commission to secure these acquisitions, preserving and creating affordable housing opportunities in older communities.
<b>Goal 8:</b> Support efforts to nurture and sustain racially integrated communities in Howard County, such as the new Columbia Housing Center.	<b>Complete.</b> Howard County supports the Columbia Housing Center with annual CDBG funding.

2020 AI Goal	Status
<b><i>Increase homeownership opportunities for under-represented households</i></b>	
<p><b>Goal 9:</b> Engage lenders in discussions about homeownership and mortgage lending disparities and how to address. Seek investments in financial literacy programs (including in schools) and assistance in helping subprime loan holders refinance to conventional loans. Develop specific action steps to address disparities in the minority homeownership rate.</p>	<p><b>In progress.</b> Howard County has increased the number of lenders approved to participate in the County's homeownership programs, such as the Moderate Income Housing Unit (MIHU) program and the Settlement Downpayment Loan Program (SDLP), to provide additional opportunities for first time and minority homebuyers. These programs reduce barriers to homeownership by providing homes at a lower sales price and loans for downpayment and closing cost assistance. New SDLP regulations adopted in 2023 set a maximum loan interest rate at 3% and added a loan forgiveness provision. Howard County also increased funding for first time homebuyer workshops and homeownership counseling.</p>
<b><i>Expand fair housing choices for people with disabilities</i></b>	
<p><b>Goal 10:</b> Ensure that people with disabilities have control in the choice of their service provider by prohibiting leases that require tenants to receive supportive services from the provider operating the housing. Ensure that tenants cannot be evicted or discharged for reasons unrelated to their housing or a breach of their lease.</p>	<p><b>Complete.</b> Persons with disabilities may choose a housing provider and a service provider on their own. Howard County is working to educate developers about the DIHU (Disability Income Housing Unit) alternative method of compliance for their MIHU requirement to increase the availability of rental housing units that could be affordable to persons with disability income.</p>



## SECTION III.

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### DEMOGRAPHIC PATTERNS

## SECTION III.

# Demographic Patterns

This section examines demographic patterns that are associated with residential settlement, housing availability and affordability, and access to opportunity. It also provides context for the analyses in subsequent sections of the study.

This section updates the information used to prepare the 2020 Regional Analysis of Impediments to Fair Housing Choice (AI):

- *Describing demographic patterns in the region and over time;*
- *Examining segregation and identifying the racial and ethnic groups that experience the highest levels of segregation and geographic areas that are segregated and integrated; and*
- *Identifying racially and ethnically concentrated areas of poverty (R/ECAPs) and the location and predominant protected classes residing in R/ECAPs.*

## Primary Findings

- Residents of color have increased in the region over the past 5 years, making up its full net population increase. Segregation between Black/African American and White residents has continued to decline slightly, but remains high. Black/African American residents (and all non-White residents overall) are just as likely to share a neighborhood with Non-Hispanic White residents as they were in 2010.

At the same time, Hispanic residents have begun moving to communities that were previously overwhelmingly Black, lowering the segregation levels of each of those census tracts, even while Black/Hispanic segregation levels overall remain unchanged.

In contrast, Hispanic/White and Asian/White segregation has increased, and these residents have become more isolated since 2010.

- By jurisdiction,
  - 75% of Anne Arundel County's residents live in Non-Hispanic White majority tracts in 2022, down from 83% in 2016. An increasingly share of residents live in non-majority tracts (18%, up 6 percentage points from 12% in 2016), and over 30% of African American residents and Hispanic residents live in non-majority tracts. These shifts indicate a gradual shift toward integration in Anne Arundel County since 2016.
  - 60% of Baltimore County's residents live in Non-Hispanic White majority tracts followed by African American majority tracts (23%). Since 2016,

Baltimore County residents have become less likely to live in Non-Hispanic White majority tracts, suggesting an overall trend toward integration.

- 11% of Harford County residents live in census tracts with no racial majority, up from 4% in 2016—and suggesting a trend toward integration.
  - Of the jurisdictions studied, Howard County has by far the greatest share of residents living in non-majority tracts (45%, up from 35% in 2016). This increase, along with the conversion of two census tracts to African American majority tracts since 2016, has increased Howard County's racial diversity overall, although the two new majority tracts may indicate pockets of segregation. As of 2022, Howard County's Hispanic and African American residents are more likely to live in non-majority tracts than they are to live in Non-Hispanic White majority tracts.
  - Baltimore City has a far greater share of total residents living in African American majority tracts (64%) than any other jurisdiction. Hispanic and Asian residents of Baltimore City are most likely to live in non-majority tracts, and most Non-Hispanic White residents live in Non-Hispanic White majority tracts. Like other jurisdictions in the region, Baltimore city has experienced an increase in the share of total residents living in non-majority tracts since 2016, indicating a trend toward integration—although some of this is due to the decline in the Black/African American population in the city.
- The average household size in the region is 2.52 people per household. Baltimore City has the smallest household size at 2.23 persons per housing unit and Howard County has the largest at 2.79, followed by Harford (2.65) and Anne Arundel County (2.63).
  - Between 2017 and 2022, median income grew similarly across races and ethnicities, increasing by 25 to 30%. Because median incomes vary significantly by race and ethnicity, this growth has not narrowed the income gap.<sup>1</sup> Instead, numerically, median incomes for African Americans rose by \$15,200 and, for Hispanic households, \$19,800 while Non-Hispanic White and Asian households saw their median incomes grow by at least \$22,000.
  - The shares of members of each racial and ethnic group earning more than \$100,000 have increased since 2017, indicating that at the upper levels of the income spectrum, economic growth has benefitted residents of all races and ethnicities. However, as

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<sup>1</sup> Because African American and Hispanic households have lower median incomes, the proportionate increases would need to be much larger to narrow the gap.

shown in largely constant poverty rates between 2017 and 2022, benefits of economic growth have not reached the lowest-earning residents.<sup>2</sup>

- African American residents are significantly overrepresented in the region's racially and ethnically concentrated areas of poverty (R/ECAPs), constituting 76% of the total R/ECAP population but only 31% of the region's population. Compared to families in the Baltimore region overall, families in the Baltimore region's R/ECAP tracts are more likely to have children. Half of families in R/ECAPs have children, compared to 42% of families in the Baltimore region. Residents of R/ECAPs are more likely than residents of the Baltimore region overall to have been born in the United States: 8.3% of R/ECAP residents were born in a foreign country compared to 11.2% of Baltimore region residents.

## History of Residential Settlement and Segregation

Residential settlement in the Baltimore region has historically been shaped by intentional efforts to segregate residents by race, ethnicity, national origin, disability, and class. This history is vast. The brief synopsis below serves as a reminder of some of the many contributors to the regional challenges seen today.

**Racial zoning.** The City of Baltimore was the first city in the U.S. to enact “racial zoning”—city codes dictating where residents live based on their race or ethnicity. The city's law, Ordinance 610, intended to curb Black/White residential integration, which was prompted by the purchase of a row house by a prominent African American civil rights attorney in a majority White neighborhood. That city law designated city blocks as either majority Black or majority White and prohibited residents from moving into a block when they were not in a majority. Blocks that were mixed race required a judge's determination of which race constituted a “majority.”

Racial zoning is important not only because it tried to disrupt the racial and ethnic integration that already existed in Baltimore City, but also because it became a successful way to deny minority residents the benefits of public and private investment. Restoration of the city after the 1904 fire led to expansion of modern water and sewer systems into areas that would be termed “high opportunity areas” today. Racial zoning limited the benefits of those investments by dictating where residents could live based on their skin color.

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<sup>2</sup> This table presents 5-year estimates due to limited availability of 1-year estimates and large margins of error in 1-year estimates for minority groups. Analysis of 1-year estimates where possible confirms that poverty has remained relatively constant overall as shares of households earning over \$100,000 increased. This footnote highlights the most significant differences between 1-year and 5-year estimates. According to 1-year ACS estimates, Asian residents in Anne Arundel County, Hispanic residents in Baltimore County, and Hispanic residents in Baltimore City saw the share of their households earning greater than \$100,000 decrease since 2017, but 5-year estimates show these shares to have increased since 2017. Further, poverty remained constant for Hispanic residents of Baltimore County according to 5-year estimates and increased by 8 percentage points according to 1-year estimates.

**Restrictive covenants.** A 1917 decision by the U.S. Supreme Court invalidated racial segregation ordinances like Baltimore's; however, many cities, including Baltimore, found other legal mechanisms to enforce racial zoning. Covenants attached to residential properties were one tool.

As the suburban expansion of Baltimore City took hold, many land developers—most notably the Roland Park Company—attracted mid- to upper-class White residents by promising neighborhoods free from the public health hazards of the factories in the city core. And by attaching racial and ethnic covenants to those properties, those developers assured the owners that African Americans and sometimes other people of color would not become their neighbors.

**Suburban migration.** As wealthy and middle class White households moved to the newly formed city-suburbs like Roland Park and other less expensive developments, the workers and residents who were denied those housing options were left behind. Those workers, who were largely immigrants and racial and ethnic minorities, had few choices to expand their economic situation, due to employment and housing discrimination. They remained in central, east, and west Baltimore City, many living in very substandard housing.

Future public programs to address blight resulted in demolition of the substandard housing in which these residents lived, displacing racial and ethnic minorities, and further limiting rental opportunities. Public housing was funded as the solution to address gaps in the rental market, yet separated residents by race and tended to concentrate developments for people of color in areas with the lowest levels of environmental health.

Maryland voters then amended the State constitution in 1948 to prohibit the City of Baltimore from continuing to annex land. Employers began to relocate or expand into the suburbs and retail and commercial development followed. Many White residents who could move, did, and the City lost more than half of its white population by 1980. Only a significant in-migration of African American residents until the 1990 census prevented the City's overall population loss since 1950 from being more severe. African Americans were generally denied residential access to the suburbs because of their inability to secure a mortgage loan, lack of rental housing, and overt discrimination. The prohibition on annexation denied the city from realizing the economic benefits of the nationwide suburban migration that continued for many decades, supported by federal investments in highway expansion and homeownership initiatives.

**Redlining.** The term “redlining” refers to a practice of the Federal Home Owner’s Loan Corporation (HOLC), which was established in 1933 to stabilize the housing market. Prior to the HOLC, homeownership was unusual for all but the very wealthy, as lenders required very large down payments (e.g., 50% of home value), interest only payments with a “balloon” payment at the end of the loan term requiring additional financing, and a loan

term of just five to seven years. The HOLC restructured troubled mortgages with emergency federal funding during the Depression, preventing many foreclosures.

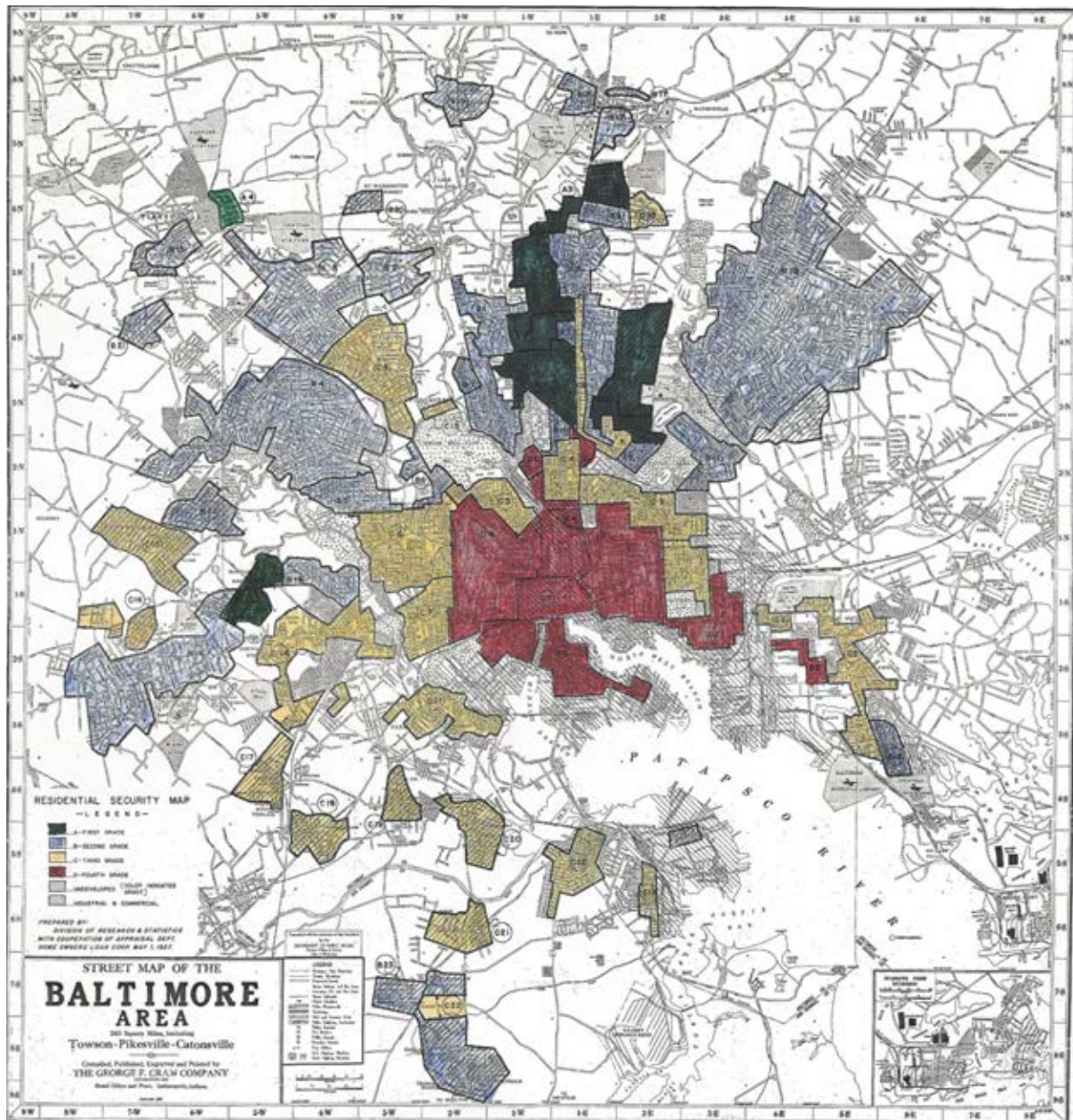
To evaluate loan risk, the HOLC hired local real estate agents to develop maps depicting neighborhood quality, on which loan pricing would be based. Lacking data or historical trends to evaluate risk, these agents relied on local real estate agent expertise (which included racial and ethnic prejudice) as well as the popular eugenics racial hierarchy of the day to risk-rate residential blocks and neighborhoods. This not only had the effect of reinforcing the segregation of non-White residents into certain areas in cities, but it also aided White wealth-building by supporting low-interest home mortgages in segregated White areas. At the same time, it generally prevented non-White residents from obtaining home ownership by supporting only high-interest loans—or none at all—for purchasing a central city home.

An example of redlining in the Baltimore region is shown in the following map from 1937. Dark green and blue areas were rated as lower risk areas; these were areas where residential loans were easiest to obtain and issued at the lowest interest rates. Yellow areas were moderate- to high risk and red were the lowest grade areas; red areas could not receive conventional mortgage loans.

The effect of this risk-rating system, which persisted into similar Federal Housing Administration (FHA) maps that no longer survive, was to drive capital and access to mortgages with the lowest rates into new, segregated White neighborhoods and away from older “lower grade” neighborhoods which, in Baltimore, were working class neighborhoods dominated by industrial uses and minority and immigrant residents.



**Figure III-1.**  
**Baltimore Redlining Map, 1937**



Source: NARA II RG 195, Entry 39, Folder "Austin, Texas," Box 153.

The Federal Housing Administration (FHA), which insures residential mortgages, was formed shortly after the HOLC and continued the federal effort to expand homeownership for the middle class. Due to the same prejudices as in the HOLC maps, however, opportunity was effectively only available to White renters, as the FHA underwriting manual instructed against higher risk ratings for neighborhoods with mixed race or social class. The FHA also actively denied lending in urban neighborhoods, favoring lending in suburbs. In effect, the FHA rewarded racial covenants and cut off racial and ethnic minorities from conventional mortgages, denying them America's most successful wealth-

building tool: subsidized ownership of one's home in a neighborhood where one could expect investment, and thus value appreciation, in the future.

Discrimination in mortgage lending provided an opportunity for predatory lenders to make huge profits by preying on racial fears and discrimination through a strategy known as blockbusting. This had two elements: Predatory lenders convinced White owners to sell at below market prices based on threats that minority buyers were moving into the neighborhood, and then offered minority buyers inflated prices with unfavorable lending terms.

Laws prohibiting discrimination in lending were passed in 1974, much later than the prohibition of other discriminatory actions. As such, for decades these restrictions on mortgage lending—mostly for African Americans, immigrants, and women—significantly limited access to economic growth which, in the U.S., is primarily achieved through homeownership.

**Cumulative impact.** In sum, for much of the 20<sup>th</sup> century, African American residents' housing choice in the region was disrupted through forced relocation (examples are the creation of Preston Gardens in downtown Baltimore<sup>3</sup> and the Rt. 40 "Highway to Nowhere" in West Baltimore); denial of ownership opportunities (redlining, blockbusting, mortgage insurance discrimination); segregation into developments and neighborhoods with concentrated poverty; and restrictions on migration into higher opportunity, mostly suburban areas (racial covenants, housing market discrimination).

The practices that denied housing choice for many protected classes in Baltimore reached the region early relative to other metropolitan areas, and were persistently and stubbornly applied for decades. The cumulative impact of these actions, as discussed in the remainder of section, have led to considerable differences in economic opportunity.

## Demographic Context

**Population.** According to the city's planning department, the City of Baltimore's population peaked in 1950 at 949,708. As discussed above, around this time, a state law was passed that limited the city's ability to annex additional land. This, coupled with federal subsidies into highway expansions, white flight from *Brown v. Board of Education* school desegregation in Baltimore City, and the growing popularity of the suburbs nationally, shifted growth away from the City of Baltimore into the counties, primarily Baltimore County.

As shown in Figure III-2 below, Baltimore City's population decreased by 166,100 residents (23%) between 1990 and 2022, from 736,000 people to 569,900. Overall, the city lost 23% of

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<sup>3</sup> Pietila, Antero, *Not in My Neighborhood: How Bigotry Shaped a Great American City*, pages 50-52.



its residents between 1990 and 2022. About half of this population loss occurred between 1990 and 2000. Another 25% occurred in the five years between 2017 and 2022.

In contrast, the regional population grew 17% from 2,224,800 in 1990 to 2,608,700 in 2022. Relative to 1990 population levels, Howard County experienced the greatest population growth of any Baltimore region jurisdiction with a 79% increase between 1990 and 2022, followed by Harford County at 45%.

By numbers, Anne Arundel County added the greatest number of residents between 1990 and 2022 at +166,000 residents, closely followed by Baltimore County at +154,000 residents.

These trends align with regional migration trends highlighted in the 2023 Maryland State of the Economy report:<sup>4</sup>

- The general migration pattern of residents in the region is to move from Baltimore City into Baltimore County and Anne Arundel County. Residents out-migrating from Baltimore County tend to relocate in Harford, Frederick, and Carroll Counties—where cost of living lower for the region—as well as Howard County. Residents leaving Anne Arundel County tend to move to the Eastern Shore.
- Since the pandemic, most households leaving the city are high earning households moving from higher- to lower-cost and more rural areas including Harford, Frederick, and Carroll Counties.
- Despite net out-migration, Baltimore City continues to attract middle-income young professionals—and especially young Black/African American professionals—as the most affordable major city on the East Coast.
- Howard and Anne Arundel Counties have seen negative intra-state net migration despite positive net migration overall in recent years, largely due to prohibitively high cost of living: Marylanders who wish to live in these counties often cannot afford to, and recent positive net migration overall is due to in-migration from other states.

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<sup>4</sup> Maryland 2023 State of the Economy p. 78-81, Office of the Comptroller, <https://www.marylandtaxes.gov/reports/static-files/SOTE.pdf>.

**Figure III-2**  
**Population Change, Baltimore Region and by Jurisdiction, 1990–2022**

Total Population	1990	2000	2010	2017	2020	2022	Change 1990-2022		Change 2010-2022		Change 2017-2022	
							Number	Pct	Number	Pct	Number	Pct
Anne Arundel County	427,239	489,656	537,656	573,235	588,261	593,286	166,047	39%	55,630	10%	20,051	3%
Baltimore County	692,134	754,292	805,029	832,468	854,535	846,161	154,027	22%	41,132	5%	13,693	2%
Harford County	182,132	218,590	244,826	252,160	260,924	263,867	81,735	45%	19,041	8%	11,707	5%
Howard County	187,328	247,842	287,085	321,113	332,317	335,411	148,083	79%	48,326	17%	14,298	4%
Baltimore City	736,014	651,154	620,961	611,648	585,708	569,931	-166,083	-23%	-51,030	-8%	-41,717	-7%
Annapolis	33,187	35,806	38,394	39,151	40,812	40,719	7,532	23%	2,325	6%	1,568	4%
Region	2,224,847	2,361,534	2,495,557	2,590,624	2,621,745	2,608,656	383,809	17%	113,099	5%	18,032	1%

Note: Annapolis data for 2017 and 2022 are 5-year ACS estimates. 1-year ACS estimates are presented for all others for 2017 and 2022.

Source: 1990, 2000, 2010, and 2020 Decennial Census and 2017 and 2022 ACS 1-year and 5-year estimates.

As a result of unequal population growth among the region’s jurisdictions, the geographic distribution of the regional population has shifted since 1990, as shown in Figure III-3.

Baltimore City is the only jurisdiction to have seen its share of the regional population decrease. Baltimore City was home to one third of the region’s residents in 1990; as of 2022 this had dropped to 22%.

All counties’ shares of the region’s population have grown by at least one percentage point since 1990, with the strongest growth taking place in Howard County (5 percentage points from 8% to 13%) and Anne Arundel County (4 percentage points from 19% to 23%).

Anne Arundel County now houses 23% of the region’s population—slightly more than Baltimore City. In 1990, Anne Arundel was 19% of the region’s population, and Baltimore City was 33%.

**Figure III-3.**  
**Population Distribution by Jurisdiction, Baltimore Region, 1990–2022**

	1990	2000	2010	2017	2020	2022
Anne Arundel County	19%	21%	22%	22%	22%	23%
Baltimore County	31%	32%	32%	32%	33%	32%
Harford County	8%	9%	10%	10%	10%	10%
Howard County	8%	10%	12%	12%	13%	13%
Baltimore City	33%	28%	25%	24%	22%	22%

Source: 1990, 2000, 2010, and 2020 Decennial Census and 2017 and 2022 1-year ACS estimates.

**Households.** As shown in Figure III-4, trends in total households have tracked trends in population overall between 1990 and 2022: Baltimore City lost households over this period, mostly due to decreases in the 1990s; between 2017 and 2022, the number of households increased. Howard County added households at the greatest rate, followed by Harford County.

**Figure III-4.**  
**Change in Households, Baltimore Region and by Jurisdiction, 1990–2022**

Total Households	1990	2000	2010	2017	2020	2022	Change 1990-2022		Change 2010-2022		Change 2017-2022	
							Number	Pct	Number	Pct	Number	Pct
Anne Arundel County	149,114	178,670	199,378	205,395	219,971	221,704	72,590	49%	22,326	11%	16,309	8%
Baltimore County	268,280	299,877	316,715	312,859	329,964	328,611	60,331	22%	11,896	4%	15,752	5%
Harford County	63,193	79,667	90,218	92,895	98,282	98,822	35,629	56%	8,604	10%	5,927	6%
Howard County	68,337	90,043	104,749	111,337	118,781	119,230	50,893	74%	14,481	14%	7,893	7%
Baltimore City	276,484	257,996	249,903	239,791	251,479	247,232	-29,252	-11%	-2,671	-1%	7,441	3%
Annapolis	14,061	15,303	16,136	15,684	16,751	16,969	2,908	21%	833	5%	1,285	8%
Region	839,469	921,556	960,963	962,277	1,018,477	1,015,599	176,130	21%	54,636	6%	53,322	6%

Note: Annapolis data for 2017 and 2022 are 5-year ACS estimates. 1-year ACS estimates are presented for all other jurisdictions in 2017 and 2022.

Source: 1990, 2000, 2010, and 2020 Decennial Census and 2017 and 2022 1-year and 5-year ACS estimates.

Changes in total population and total households affect average household size, which are presented in Figure III-5 below. Between 2000 and 2022, growth in households outpaced growth in population in the region overall and in Anne Arundel and Harford Counties. In these jurisdictions, average household size decreased between 2000 and 2022.

Population grew faster than total households causing increases in average household size in Baltimore County, Howard County, and Annapolis between 2000 and 2022.

Baltimore City lost population at a greater rate than it lost households—indicating that families moved out and smaller, non-family households stayed and moved into the city.

Baltimore City has the smallest household size at 2.23 persons per housing unit and Howard County has the largest at 2.79, followed by Harford (2.65) and Anne Arundel County (2.63).

**Figure III-5.**  
**Average Household Size, Baltimore Region and by Jurisdiction, 2000–2022**

Average Household Size	2000	2010	2017	2020	2022	Change 2000-2022
Anne Arundel County	2.65	2.63	2.72	2.63	2.63	-0.02
Baltimore County	2.46	2.48	2.59	2.52	2.51	0.06
Harford County	2.72	2.68	2.69	2.64	2.65	-0.07
Howard County	2.71	2.72	2.86	2.77	2.79	0.08
Baltimore City	2.42	2.38	2.45	2.26	2.23	-0.19
Annapolis	2.30	2.34	2.46	2.40	2.36	0.07
Region	2.53	2.53	2.63	2.52	2.52	-0.01

Note: Annapolis data for 2017 and 2022 are 5-year ACS estimates. 1-year ACS estimates are presented for all other jurisdictions for 2017 and 2022.

Source: 1990, 2000, 2010, and 2020 Decennial Census and 2017 and 2022 1-year and 5-year ACS estimates.

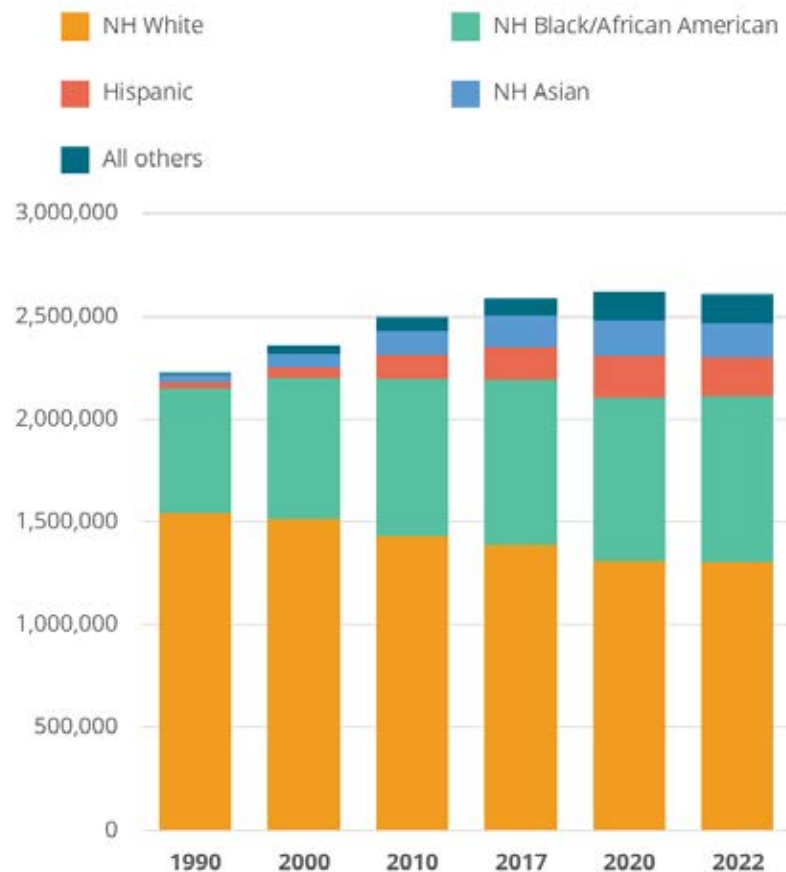
**Race and ethnicity.** Figure III-6 shows the race and ethnicity of residents in the region, based on self-identification in Census surveys. Racial and ethnic diversity has increased with population growth. Overall, the region is 50% non-Hispanic White and 50% non-White and Hispanic as of 2022. African American residents comprise the largest racial group after non-Hispanic White residents at 31% of the region’s population.

**Figure III-6.  
Population by Race  
and Ethnicity,  
Baltimore Region,  
1990–2022**

Note: “NH” indicates Non-Hispanic. For the purposes of this analysis, Hispanic is treated as a race (the Census treats Hispanic as an ethnicity, separate from race).

Source:

1990, 2000, 2010, and 2020 Decennial Census and 2017 and 2022 1-year ACS estimates.

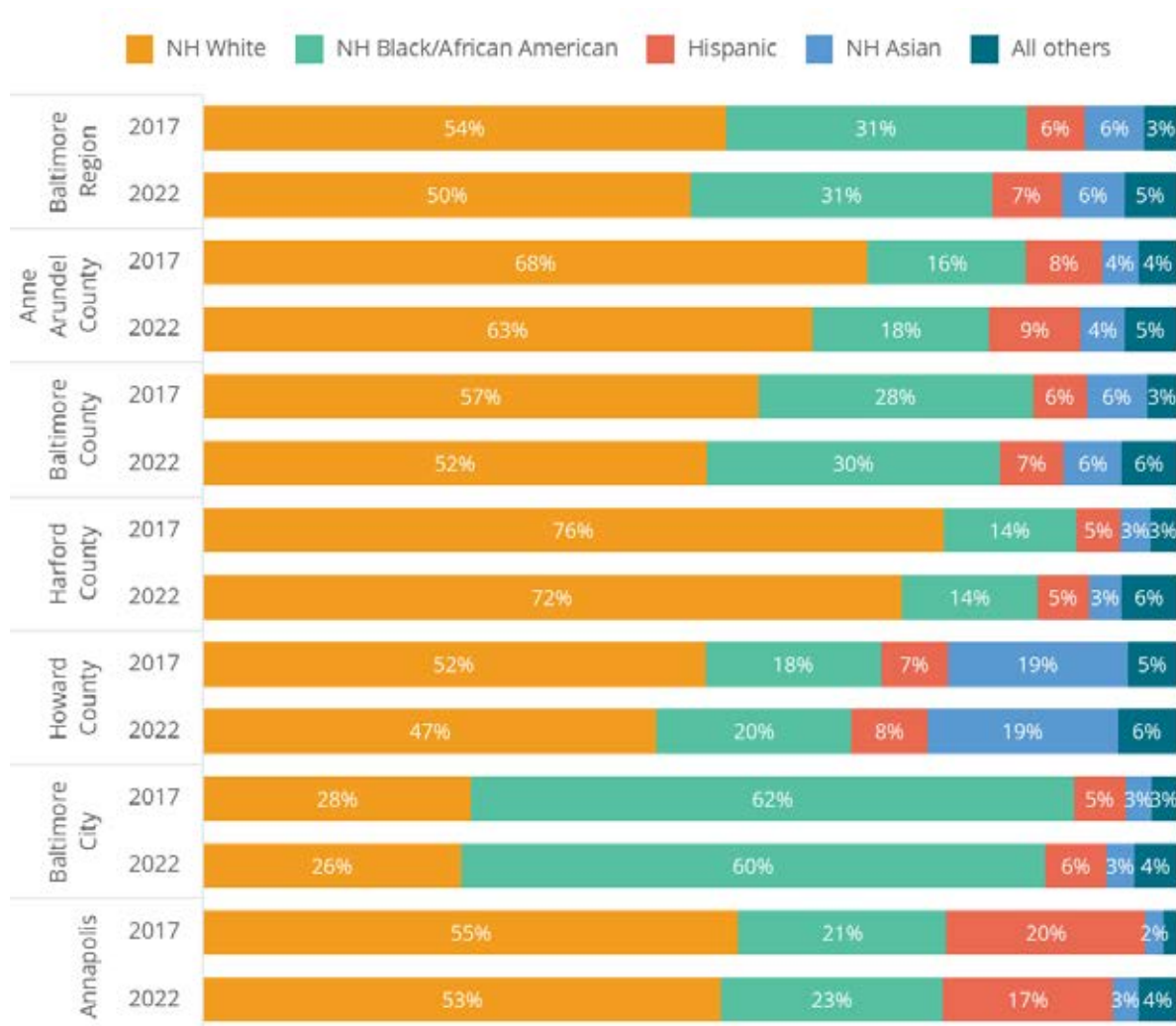


Racial and ethnic distributions vary by jurisdiction, as shown for 2017 and 2022 in Figure III-7. Non-Hispanic White residents—who constitute at least 50% of residents in the Baltimore region and each jurisdiction studied, including Annapolis—have decreased as shares of total population in each jurisdiction since 2017.

In 2022, as in 2017, Harford and Anne Arundel Counties have the highest share of residents identifying as Non-Hispanic White, at 72% and 63% respectively. By contrast, in Baltimore City, 60% of residents are Black/African American and 26% are Non-Hispanic White.

Of the jurisdictions studied, the share of residents identifying as Hispanic is greatest in Annapolis at 17%. The share of residents identifying as Asian is greatest in Howard County at 19%.

**Figure III-7.**  
**Racial and Ethnic Population Distribution by Jurisdiction, Baltimore Region, 2017 and 2022**



Note: Annapolis data are 5-year ACS estimates. All other data are 1-year ACS estimates.

Source: 2017 and 2022 1-year and 5-year ACS estimates.

The tables on the following two pages show, for each jurisdiction, numerical and percentage change in residents by race and ethnicity. Since 2017:

- Non-Hispanic White populations have decreased in the Baltimore region overall and in each jurisdiction except for Annapolis, where growth in Non-Hispanic White residents was slight (at +131 residents).
- The Baltimore region's Black/African American population increased modestly overall. The exception is Baltimore City: the city's Black/African American population declined by 36,700, or 10%, from 2017 to 2022, largely due to out-migration of Black/African

American households.<sup>5</sup> Annapolis and all counties in the Baltimore region saw their Black/African American populations increase by at least 7%. Baltimore County added the most Black/African American residents (+19,200). By percentage growth, the increase in the Black/African American populations was greatest in Howard County (+16%) and Anne Arundel County (+15%).

- Hispanic populations grew by 20% or more in the Baltimore region and Anne Arundel, Baltimore, Harford, and Howard Counties. Baltimore City saw its Hispanic population increase by 11%. Annapolis is the only jurisdiction to have lost Hispanic residents, with a decline of 11% since 2017.
- The Baltimore region added 10,400 Asian residents, and this growth was concentrated in Howard and Anne Arundel Counties. Relative to 2017 population levels, Annapolis and Anne Arundel County experienced the greatest growth in Asian residents. Asian populations decreased only in Baltimore County and Baltimore City, where losses were modest at 3% and 1%, respectively.
- The Baltimore region's population identifying as other races grew by 61%. Populations of other races grew substantially in each jurisdiction.

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<sup>5</sup> Maryland 2023 State of the Economy, Office of the Comptroller, <https://www.marylandtaxes.gov/reports/static-files/SOTE.pdf>.



**Figure III-8.**  
**Population by Race and Ethnicity, Baltimore Region and by Jurisdiction,**  
**2017 and 2022**

	Population		Change 2017-2022	
	2017	2022	Number	Percent
<b>Baltimore Region</b>	2,590,624	2,608,656	18,032	1%
NH White	1,390,816	1,305,632	-85,184	-6%
NH Black	798,840	807,154	8,314	1%
Hispanic	156,971	188,143	31,172	20%
NH Asian	157,136	167,501	10,365	7%
All others	86,861	140,226	53,365	61%
<b>Anne Arundel County</b>	573,235	593,286	20,051	3%
NH White	390,949	371,287	-19,662	-5%
NH Black	93,293	107,535	14,242	15%
Hispanic	45,093	55,856	10,763	24%
NH Asian	21,372	26,482	5,110	24%
All others	22,528	32,126	9,598	43%
<b>Baltimore County</b>	832,468	846,161	13,693	2%
NH White	474,462	438,122	-36,340	-8%
NH Black	234,756	253,963	19,207	8%
Hispanic	45,895	55,641	9,746	21%
NH Asian	52,115	50,576	-1,539	-3%
All others	25,240	47,859	22,619	90%
<b>Harford County</b>	252,160	263,867	11,707	5%
NH White	191,633	189,184	-2,449	-1%
NH Black	34,402	36,920	2,518	7%
Hispanic	11,515	14,024	2,509	22%
NH Asian	7,669	8,714	1,045	14%
All others	6,941	15,025	8,084	116%
<b>Howard County</b>	321,113	335,411	14,298	4%
NH White	165,566	156,132	-9,434	-6%
NH Black	57,918	66,975	9,057	16%
Hispanic	21,973	26,498	4,525	21%
NH Asian	59,491	65,390	5,899	10%
All others	16,165	20,416	4,251	26%

Note: Annapolis data are 5-year ACS estimates. All other data are 1-year ACS estimates.

Source: 2017 and 2022 1-year and 5-year ACS estimates.

**Figure III-8 (continued).**  
**Population by Race and Ethnicity, Baltimore Region and by Jurisdiction,**  
**2017 and 2022**

	Population		Change 2017-2022	
	2017	2022	Number	Percent
<b>Baltimore City</b>	611,648	569,931	-41,717	-7%
<b>NH White</b>	168,206	150,907	-17,299	-10%
<b>NH Black</b>	378,471	341,761	-36,710	-10%
<b>Hispanic</b>	32,495	36,124	3,629	11%
<b>NH Asian</b>	16,489	16,339	-150	-1%
<b>All others</b>	15,987	24,800	8,813	55%
<b>Annapolis</b>	39,151	40,719	1,568	4%
<b>NH White</b>	21,511	21,642	131	1%
<b>NH Black</b>	8,365	9,290	925	11%
<b>Hispanic</b>	8,000	7,093	-907	-11%
<b>NH Asian</b>	726	1,084	358	49%
<b>All others</b>	549	1,610	1,061	193%

Note: Annapolis data are 5-year ACS estimates. All other data are 1-year ACS estimates.

Source: 2017 and 2022 1-year and 5-year ACS estimates.

**Income and poverty by race.** The tables on the following pages present median incomes by race and ethnicity for the Baltimore region, the counties in the region, and Annapolis for 2016 and 2022. As of 2022, the median household income for households in the Baltimore region was \$96,300, up \$19,114, or 25%, from \$77,200 in 2017. Asian and Non-Hispanic White households have the highest median incomes in the region and in each jurisdiction except for Annapolis (where the median income for Asian residents is much lower). Hispanic and African American households have the lowest median incomes in the region and in every jurisdiction.

Racial differences in median income vary by jurisdiction. In Anne Arundel, Baltimore, and Howard counties, the median income for Hispanic households is within \$3,000 of that of African American households. However, in Harford County and especially in Baltimore City and Annapolis, Hispanic households have median incomes significantly higher than African American households. In Baltimore City in particular, Hispanic household incomes are not much lower than Asian household incomes.

Between 2017 and 2022, median income grew similarly across races and ethnicities, increasing by 25-30%. Numerically, however, growth was lower for African American and Hispanic households: Median incomes for these groups grew by \$15,200 and \$19,800

respectively, while Non-Hispanic White and Asian households saw their median incomes grow by at least \$22,000.

**Figure III-9.**  
**Median Household Income by Race and Ethnicity, Baltimore Region and by Jurisdiction, 2017 and 2022**

	Median Household Income		Change 2017-2022	
	2017	2022	Number	Percent
<b>Baltimore Region</b>	\$77,168	\$96,282	\$19,114	25%
<b>NH White</b>	\$90,034	\$112,264	\$22,230	25%
<b>NH Black</b>	\$54,292	\$69,481	\$15,189	28%
<b>Hispanic</b>	\$67,177	\$86,971	\$19,794	29%
<b>NH Asian</b>	\$96,969	\$125,901	\$28,932	30%
<b>Anne Arundel County</b>	\$94,502	\$116,009	\$21,507	23%
<b>NH White</b>	\$100,368	\$123,410	\$23,042	23%
<b>NH Black</b>	\$78,916	\$99,667	\$20,751	26%
<b>Hispanic</b>	\$75,149	\$98,703	\$23,554	31%
<b>NH Asian</b>	\$103,121	\$109,370	\$6,249	6%
<b>Baltimore County</b>	\$71,810	\$88,157	\$16,347	23%
<b>NH White</b>	\$76,164	\$97,539	\$21,375	28%
<b>NH Black</b>	\$64,085	\$75,271	\$11,186	17%
<b>Hispanic</b>	\$60,389	\$74,005	\$13,616	23%
<b>NH Asian</b>	\$77,652	\$98,942	\$21,290	27%
<b>Harford County</b>	\$83,445	\$106,417	\$22,972	28%
<b>NH White</b>	\$86,734	\$108,889	\$22,155	26%
<b>NH Black</b>	\$67,319	\$92,704	\$25,385	38%
<b>Hispanic</b>	\$72,018	\$102,462	\$30,444	42%
<b>NH Asian</b>	\$92,366	\$123,646	\$31,280	34%
<b>Howard County</b>	\$115,576	\$140,971	\$25,395	22%
<b>NH White</b>	\$127,832	\$152,771	\$24,939	20%
<b>NH Black</b>	\$90,066	\$112,037	\$21,971	24%
<b>Hispanic</b>	\$86,435	\$109,466	\$23,031	27%
<b>NH Asian</b>	\$124,725	\$168,130	\$43,405	35%
<b>Baltimore City</b>	\$46,641	\$58,349	\$11,708	25%
<b>NH White</b>	\$72,085	\$91,250	\$19,165	27%
<b>NH Black</b>	\$36,428	\$46,523	\$10,095	28%
<b>Hispanic</b>	\$51,424	\$66,911	\$15,487	30%
<b>NH Asian</b>	\$55,505	\$69,081	\$13,576	24%

Note: Baltimore region estimates are population-weighted averages of jurisdictional data. 5-year estimates are presented due to scarcity of 1-year estimates for multiple racial and ethnic groups.

Source: 2017 and 2022 5-year ACS estimates.

**Figure III-9 (continued).**

**Median Household Income by Race and Ethnicity, Baltimore Region and by Jurisdiction, 2017 and 2022**

	Median Household Income		Change 2017-2022	
	2017	2022	Number	Percent
<b>Annapolis</b>	\$81,143	\$97,219	\$16,076	20%
<b>NH White</b>	\$103,955	\$120,466	\$16,511	16%
<b>NH Black</b>	\$43,784	\$66,149	\$22,365	51%
<b>Hispanic</b>	\$61,034	\$95,487	\$34,453	56%
<b>NH Asian</b>	N/A	\$54,743	N/A	N/A

Note: 5-year estimates are presented due to scarcity of 1-year estimates for multiple racial and ethnic groups.

Source: 2017 and 2022 5-year ACS estimates.

Figure III-10 shows the share of residents experiencing poverty as well as the share of households earning more than \$100,000 annually for racial and ethnic groups by jurisdiction—to more precisely isolate who has benefitted from recent economic growth in the region.

The shares of members of each racial and ethnic group earning more than \$100,000 have increased since 2017, indicating that at the upper levels of the income spectrum, economic growth has benefitted residents of all races and ethnicities for which data are available. However, as shown in largely constant poverty rates between 2017 and 2022, benefits of economic growth have not reached the lowest-earning residents.<sup>6</sup>

In Baltimore City, the increase in the share of non-White and Hispanic households earning more than \$100,000 was much smaller than in other jurisdictions and the region overall.

Note that the apparent 28 percentage point decrease in the share of Asian households in Annapolis earning over \$100,000 owes itself to a small sample size of Asian households.

<sup>6</sup> This table presents 5-year estimates due to limited availability of 1-year estimates and large margins of error in 1-year estimates for minority groups. Analysis of 1-year estimates where possible confirms that poverty has remained relatively constant overall as shares of households earning over \$100,000 increased. This footnote highlights the most significant differences between 1-year and 5-year estimates. According to 1-year ACS estimates, Asian residents in Anne Arundel County, Hispanic residents in Baltimore County, and Hispanic residents in Baltimore City saw the share of their households earning greater than \$100,000 decrease since 2017, but 5-year estimates show these shares to have increased since 2017. Further, poverty remained constant for Hispanic residents of Baltimore County according to 5-year estimates and increased by 8 percentage points according to 1-year estimates.

**Figure III-10.**  
**Poverty Rate and Households Earning Over \$100,000 by Race and Ethnicity, Baltimore Region and by Jurisdiction, 2017 and 2022**

	Poverty Rate			% of Households Earning Over \$100,000		
	2017	2022	Change	2017	2022	Change
<b>Baltimore Region</b>	11%	10%	-1%	37%	47%	10%
<b>NH White</b>	7%	6%	0%	44%	55%	11%
<b>NH Black</b>	18%	17%	-1%	22%	31%	10%
<b>Hispanic</b>	16%	13%	-3%	31%	42%	12%
<b>NH Asian</b>	9%	8%	-1%	48%	57%	9%
<b>All others</b>	14%	12%	-2%	28%	43%	15%
<b>Anne Arundel County</b>	6%	6%	0%	47%	58%	11%
<b>NH White</b>	5%	4%	-1%	50%	61%	10%
<b>NH Black</b>	9%	10%	0%	35%	50%	15%
<b>Hispanic</b>	10%	9%	-1%	35%	50%	15%
<b>NH Asian</b>	6%	8%	2%	52%	56%	4%
<b>All others</b>	9%	9%	-1%	32%	51%	19%
<b>Baltimore County</b>	9%	10%	1%	34%	44%	10%
<b>NH White</b>	7%	8%	1%	37%	49%	12%
<b>NH Black</b>	11%	13%	2%	28%	35%	8%
<b>Hispanic</b>	17%	18%	0%	26%	36%	10%
<b>NH Asian</b>	11%	10%	-1%	39%	49%	10%
<b>All others</b>	16%	17%	1%	25%	36%	11%
<b>Harford County</b>	7%	7%	0%	41%	53%	12%
<b>NH White</b>	6%	6%	0%	43%	54%	11%
<b>NH Black</b>	13%	13%	-1%	32%	47%	15%
<b>Hispanic</b>	13%	9%	-4%	34%	52%	19%
<b>NH Asian</b>	6%	5%	-1%	44%	58%	14%
<b>All others</b>	9%	9%	0%	32%	52%	20%
<b>Howard County</b>	5%	5%	0%	58%	66%	8%
<b>NH White</b>	3%	3%	0%	63%	69%	6%
<b>NH Black</b>	10%	12%	2%	44%	55%	12%
<b>Hispanic</b>	8%	6%	-2%	44%	55%	11%
<b>NH Asian</b>	5%	5%	-1%	62%	72%	10%
<b>All others</b>	7%	4%	-2%	45%	58%	13%

Note: 5-year estimates are presented due to limited availability of 1-year estimates and large margins of error in 1-year estimates for minority groups.

Source: 2017 and 2022 5-year ACS estimates.

**Figure III-10 (continued).**  
**Poverty Rate and Households Earning Over \$100,000 by Race and Ethnicity, Baltimore Region and by Jurisdiction, 2017 and 2022**

	Poverty Rate			% of Households Earning Over \$100,000		
	2017	2022	Change	2017	2022	Change
<b>Baltimore City</b>	22%	20%	-3%	20%	28%	8%
<b>NH White</b>	13%	11%	-1%	36%	46%	10%
<b>NH Black</b>	26%	23%	-3%	11%	18%	7%
<b>Hispanic</b>	26%	18%	-8%	21%	28%	6%
<b>NH Asian</b>	21%	21%	1%	29%	34%	4%
<b>All others</b>	26%	18%	-8%	16%	30%	14%
<b>Annapolis</b>	10%	11%	1%	40%	48%	8%
<b>NH White</b>	5%	6%	1%	52%	58%	6%
<b>NH Black</b>	18%	21%	2%	17%	28%	10%
<b>Hispanic</b>	14%	10%	-4%	24%	41%	18%
<b>NH Asian</b>	20%	22%	2%	43%	15%	-28%
<b>All others</b>	15%	14%	-2%	11%	37%	25%

Note: 5-year estimates are presented due to limited availability of 1-year estimates and large margins of error in 1-year estimates for minority groups.

Source: 2017 and 2022 5-year ACS estimates.

## Who Rents and Who Owns

Figure III-11 below presents demographic characteristics of local households—including race/ethnicity, income range, household type, and householder age—by tenure for the Baltimore region and for each jurisdiction. Relative to owner households, renter households are more likely to be African American or Hispanic, less likely to earn incomes above \$75,000, less likely to be married couple households and more likely to be single person or single female-headed households, and more likely to be young (aged 15-34 years old). This is true in the region overall and in each jurisdiction studied.

**Figure III-11.**  
**Demographic Characteristics by Tenure, Baltimore Region and by**  
**Jurisdiction, 2017 and 2022**

	All Households	Owner Households	Renter Households
<b>Baltimore Region</b>	<b>1,041,381</b>	<b>686,639</b>	<b>354,742</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	54%	64%	35%
African American	32%	23%	49%
Hispanic	5%	4%	7%
Asian	5%	5%	5%
All Other Races	4%	3%	5%
<b>Income Range</b>			
Less than \$20,000	12%	7%	21%
\$20,000 - \$34,999	8%	6%	12%
\$35,000 - \$49,999	9%	6%	14%
\$50,000 - \$74,999	14%	12%	18%
\$75,000 - \$99,999	12%	12%	13%
\$100,000 - \$149,999	18%	21%	13%
\$150,000 or more	27%	36%	9%
<b>Household Type</b>			
Married Couple	43%	55%	21%
Single Female-Headed	14%	11%	20%
Single Person	31%	25%	43%
<b>Householder Age</b>			
15 to 34 years	19%	10%	34%
35 to 64 years	55%	59%	48%
65 years or older	26%	31%	18%
<b>Anne Arundel County</b>	<b>226,285</b>	<b>170,076</b>	<b>56,209</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	68%	74%	49%
African American	19%	14%	35%
Hispanic	6%	5%	9%
Asian	4%	4%	3%
All Other Races	3%	3%	4%
<b>Income Range</b>			
Less than \$20,000	7%	6%	11%
\$20,000 - \$34,999	6%	4%	11%
\$35,000 - \$49,999	6%	5%	11%
\$50,000 - \$74,999	13%	10%	20%
\$75,000 - \$99,999	12%	12%	12%
\$100,000 - \$149,999	21%	21%	18%
\$150,000 or more	36%	42%	17%
<b>Household Type</b>			
Married Couple	52%	60%	29%
Single Female-Headed	11%	10%	14%
Single Person	26%	22%	39%
<b>Householder Age</b>			
15 to 34 years	17%	11%	33%
35 to 64 years	57%	60%	50%
65 years or older	26%	29%	17%

Source: 2022 5-year ACS estimates (Annapolis) and 2022 1-year ACS estimates (all other jurisdictions and Baltimore Region).

**Figure III-11 (continued).**  
**Demographic Characteristics by Tenure, Baltimore Region and by Jurisdiction, 2017 and 2022**

	All Households	Owner Households	Renter Households
<b>Baltimore County</b>	<b>337,529</b>	<b>228,756</b>	<b>108,773</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	56%	65%	38%
African American	30%	23%	44%
Hispanic	5%	4%	8%
Asian	5%	5%	5%
All Other Races	4%	4%	5%
<b>Income Range</b>			
Less than \$20,000	10%	6%	19%
\$20,000 - \$34,999	9%	8%	11%
\$35,000 - \$49,999	10%	7%	16%
\$50,000 - \$74,999	14%	12%	18%
\$75,000 - \$99,999	14%	14%	14%
\$100,000 - \$149,999	19%	21%	15%
\$150,000 or more	24%	33%	6%
<b>Household Type</b>			
Married Couple	44%	55%	21%
Single Female-Headed	14%	10%	22%
Single Person	30%	25%	41%
<b>Householder Age</b>			
15 to 34 years	17%	9%	33%
35 to 64 years	54%	57%	47%
65 years or older	29%	33%	21%
<b>Harford County</b>	<b>101,437</b>	<b>80,893</b>	<b>20,544</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	76%	78%	65%
African American	13%	11%	20%
Hispanic	4%	3%	7%
Asian	3%	3%	3%
All Other Races	4%	4%	5%
<b>Income Range</b>			
Less than \$20,000	9%	6%	20%
\$20,000 - \$34,999	8%	7%	13%
\$35,000 - \$49,999	8%	6%	18%
\$50,000 - \$74,999	13%	11%	18%
\$75,000 - \$99,999	11%	11%	12%
\$100,000 - \$149,999	21%	23%	11%
\$150,000 or more	30%	35%	9%
<b>Household Type</b>			
Married Couple	54%	61%	26%
Single Female-Headed	10%	8%	15%
Single Person	25%	21%	40%
<b>Householder Age</b>			
15 to 34 years	16%	11%	34%
35 to 64 years	56%	60%	42%
65 years or older	28%	29%	24%

Source: 2022 5-year ACS estimates (Annapolis) and 2022 1-year ACS estimates (all other jurisdictions and Baltimore Region).



**Figure III-11 (continued).**  
**Demographic Characteristics by Tenure, Baltimore Region and by Jurisdiction, 2017 and 2022**

	All Households	Owner Households	Renter Households
<b>Howard County</b>	<b>121,423</b>	<b>85,697</b>	<b>35,726</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	54%	61%	38%
African American	20%	14%	35%
Hispanic	5%	4%	9%
Asian	16%	18%	12%
All Other Races	4%	4%	5%
<b>Income Range</b>			
Less than \$20,000	5%	2%	13%
\$20,000 - \$34,999	4%	3%	8%
\$35,000 - \$49,999	6%	5%	7%
\$50,000 - \$74,999	11%	7%	19%
\$75,000 - \$99,999	11%	9%	17%
\$100,000 - \$149,999	18%	18%	19%
\$150,000 or more	45%	56%	18%
<b>Household Type</b>			
Married Couple	58%	69%	33%
Single Female-Headed	9%	7%	15%
Single Person	21%	17%	30%
<b>Householder Age</b>			
15 to 34 years	16%	7%	37%
35 to 64 years	61%	66%	49%
65 years or older	23%	27%	14%
<b>Baltimore City</b>	<b>254,707</b>	<b>121,217</b>	<b>133,490</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	30%	39%	21%
African American	60%	53%	66%
Hispanic	4%	3%	5%
Asian	3%	2%	4%
All Other Races	3%	3%	4%
<b>Income Range</b>			
Less than \$20,000	22%	13%	29%
\$20,000 - \$34,999	12%	9%	15%
\$35,000 - \$49,999	12%	8%	15%
\$50,000 - \$74,999	16%	17%	16%
\$75,000 - \$99,999	12%	13%	11%
\$100,000 - \$149,999	13%	18%	8%
\$150,000 or more	14%	22%	6%
<b>Household Type</b>			
Married Couple	23%	35%	13%
Single Female-Headed	20%	16%	23%
Single Person	43%	36%	49%
<b>Householder Age</b>			
15 to 34 years	25%	13%	36%
35 to 64 years	51%	54%	48%
65 years or older	24%	32%	16%

Source: 2022 5-year ACS estimates (Annapolis) and 2022 1-year ACS estimates (all other jurisdictions and Baltimore Region).

**Figure III-11 (continued).**  
**Demographic Characteristics by Tenure, Baltimore Region and by Jurisdiction, 2017 and 2022**

	All Households	Owner Households	Renter Households
<b>Annapolis</b>	<b>16,969</b>	<b>10,141</b>	<b>6,828</b>
<b>Race/Ethnicity</b>			
Non-Hispanic White	63%	72%	50%
African American	21%	15%	31%
Hispanic	10%	6%	15%
Asian	3%	3%	2%
All Other Races	3%	4%	2%
<b>Income Range</b>			
Less than \$20,000	9%	6%	15%
\$20,000 - \$34,999	7%	4%	11%
\$35,000 - \$49,999	8%	4%	13%
\$50,000 - \$74,999	14%	9%	21%
\$75,000 - \$99,999	14%	14%	13%
\$100,000 - \$149,999	18%	20%	14%
\$150,000 or more	31%	42%	14%
<b>Household Type</b>			
Married Couple	40%	52%	24%
Single Female-Headed	13%	9%	19%
Single Person	37%	31%	46%
<b>Householder Age</b>			
15 to 34 years	20%	11%	32%
35 to 64 years	50%	51%	50%
65 years or older	30%	38%	18%

Source: 2022 5-year ACS estimates (Annapolis) and 2022 1-year ACS estimates (all other jurisdictions and Baltimore Region).

## Segregation and Integration

Segregation and integration can be analyzed through patterns of geographic dispersion (as evidenced in maps) and by statistical measures. This section utilizes both, beginning with geographic patterns.

Figures III-12 through III-17 show changes in geographic dispersion of residents by race and ethnicity, from 2016 to 2022.

**Non-Hispanic White concentrations.** In 2022 as in 2016, concentrations of Non-Hispanic White residents exist in the region's most rural areas and along most waterfront areas (except for Harford County). Since 2016, concentrations of Non-Hispanic White residents have decreased most significantly in Howard County tracts alongside increased concentrations of Asian residents in these areas. In Baltimore City, low concentrations of Non-Hispanic residents largely indicate high concentrations of African American residents.

**African American concentrations.** Majority concentrations of African American residents exist mostly in West and Northwest Baltimore City as well as some areas in Southwest Baltimore County and along the border between Howard County and Anne Arundel County. Populations of many tracts in Southeast Harford County and Southwest Baltimore County are 20-50% African American.

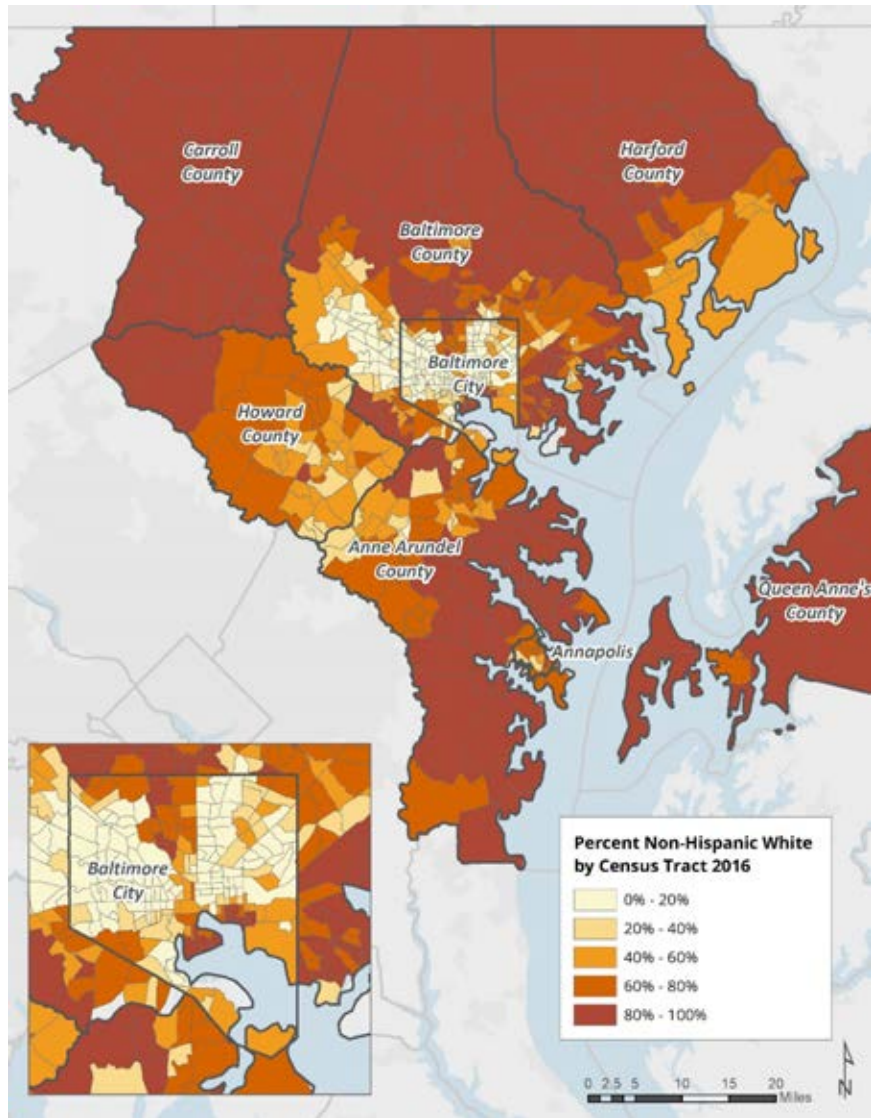
Concentrations of African American residents in Baltimore City have decreased since 2016 as the City lost around 10% of its African American residents, while surrounding jurisdictions' African American populations increased. Concentrations of African American residents increased in Southwest Baltimore County, South Harford County, North Anne Arundel County, and South Harford County.

**Hispanic concentrations.** Concentrations of Hispanic residents reach up to 40-52% of total population in Southeast Baltimore City and South Annapolis. Many tracts in areas including South Harford County, South Baltimore County, South Howard County, and North and South Anne Arundel County contain concentrations of Hispanic residents of at least 10%. Concentrations of Hispanic residents have increased in the Baltimore region overall, in Baltimore City, and the region's counties as the Hispanic population grew by around 20% and expanded into more parts of the metropolitan area. Areas with significant Hispanic populations in all counties have expanded and become more concentrated since 2016, especially in Southeast Baltimore City.

**Asian concentrations.** Areas with greater than 10% concentrations of Asian residents are located primarily in Howard County, though additional concentrations are present in Anne Arundel County, Central and Southwest Baltimore County, Harford County, and one neighborhood of Baltimore City. Concentrations of Asian residents have increased significantly in Howard County since 2016, with increasingly many census tracts containing at least 20% and 30% Asian residents.

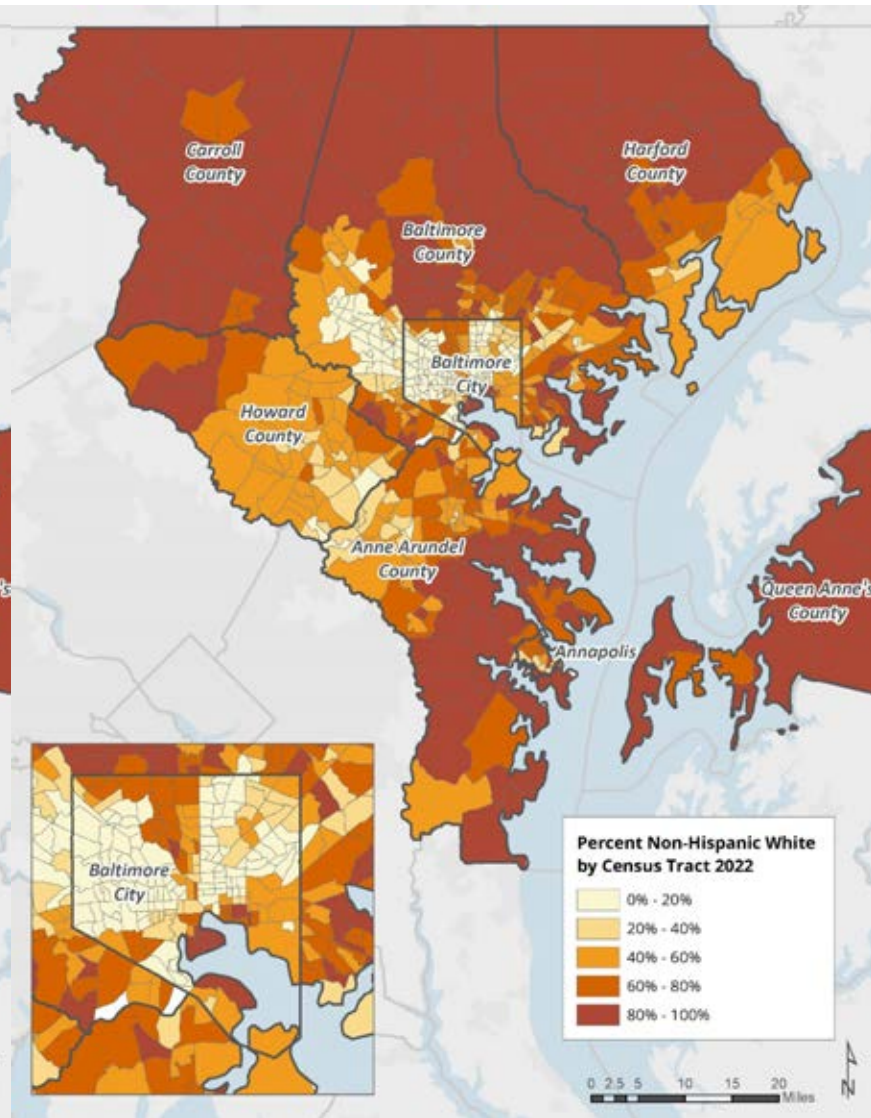
**Multi-race households.** The final maps showing concentrations of residents identifying as two or more races and some other races show lower concentrations of these residents than other racial groups throughout the region. Notably, since 2016, the share of residents identifying as some other race or two or more races increased in many census tracts.

**Figure III-12a.**  
**Percent Non-Hispanic White by Census Tract, 2016**



Source: 2016 5-year ACS.

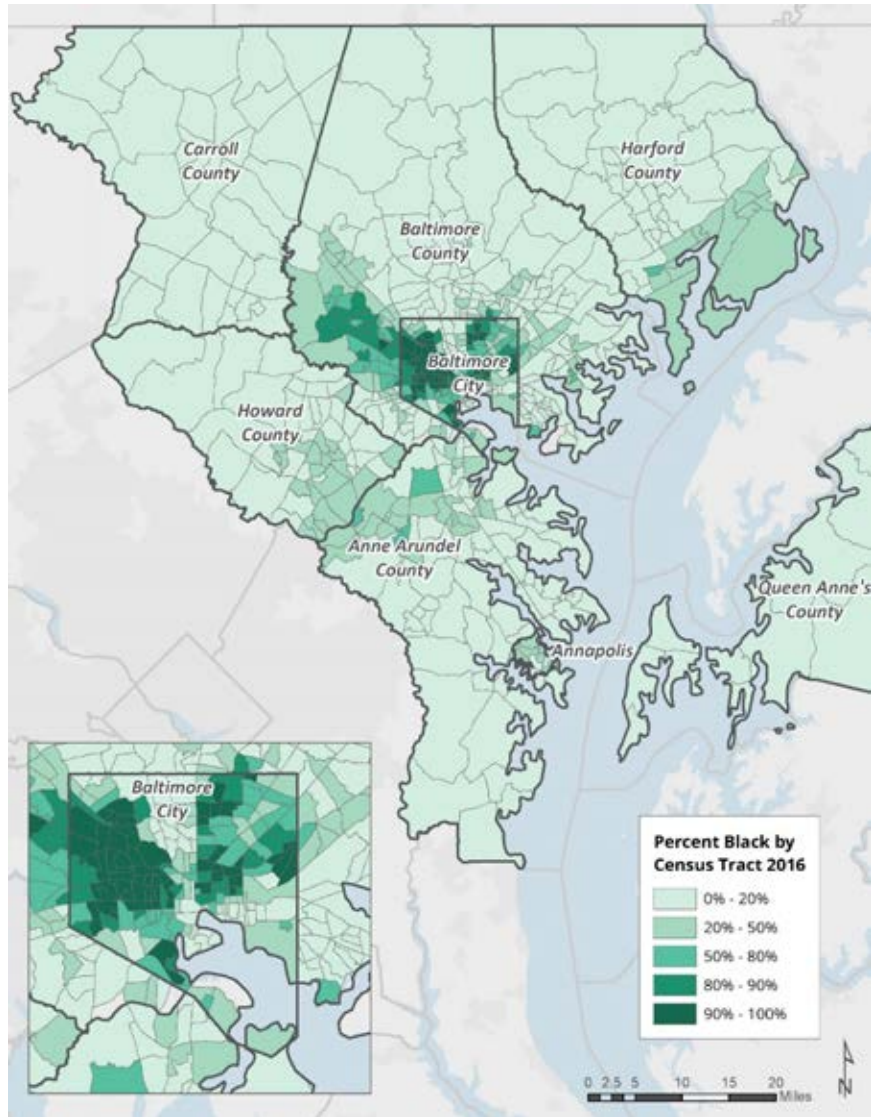
**Figure III-12b.**  
**Percent Non-Hispanic White by Census Tract, 2022**



Source: 2022 5-year ACS.

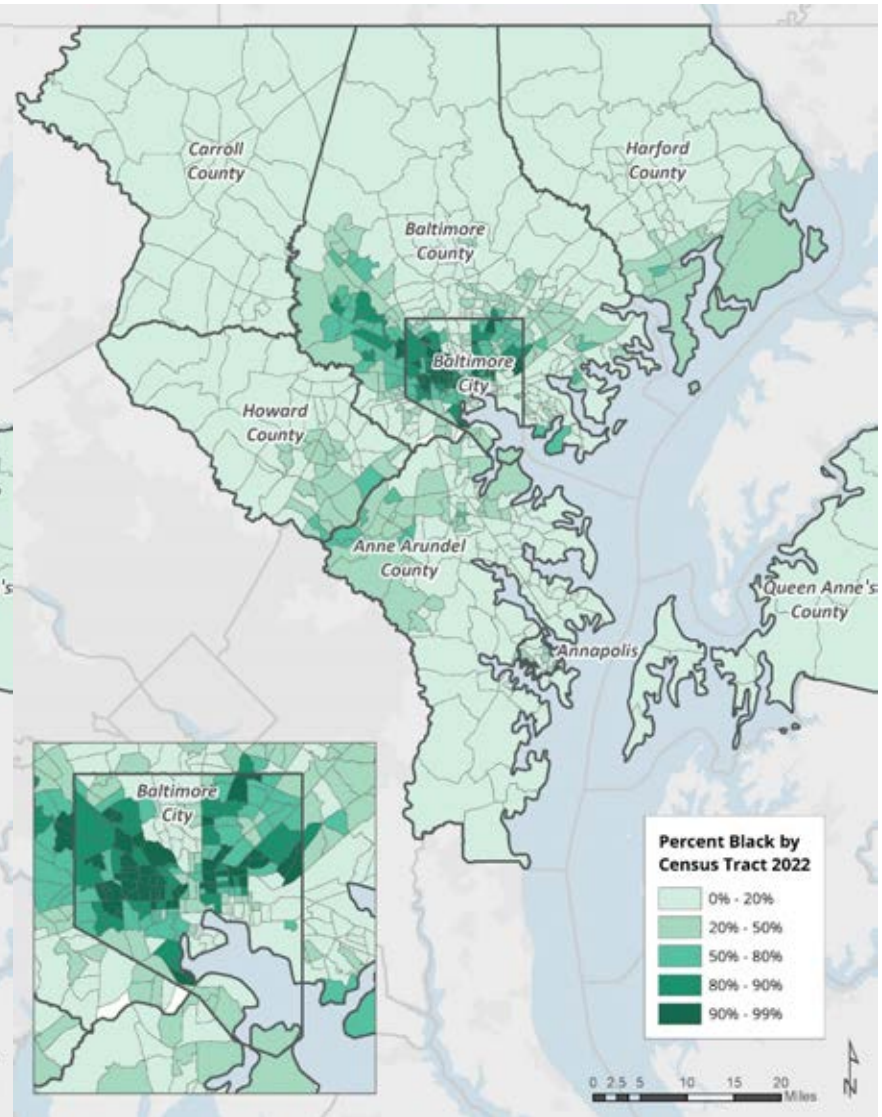


**Figure III-13a.**  
**Percent African American by Census Tract, 2016**



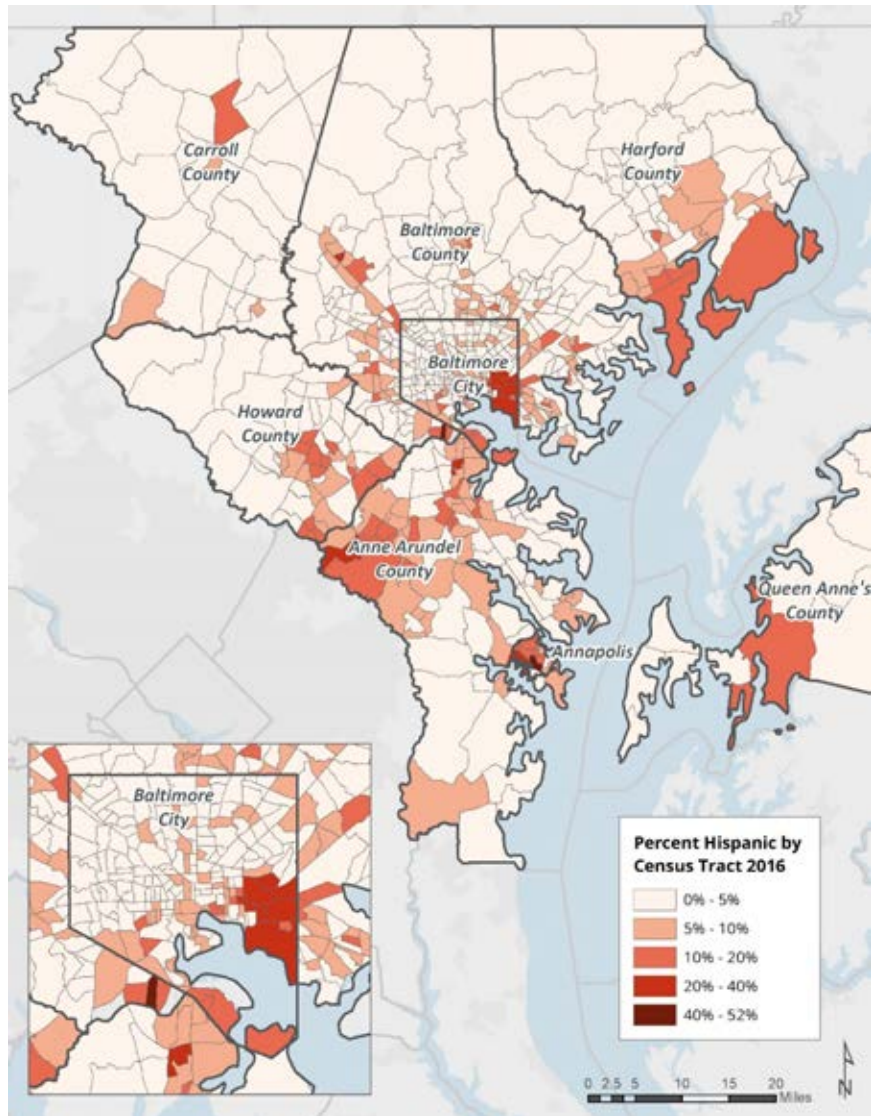
Source: 2016 5-year ACS.

**Figure III-13b.**  
**Percent African American by Census Tract, 2022**



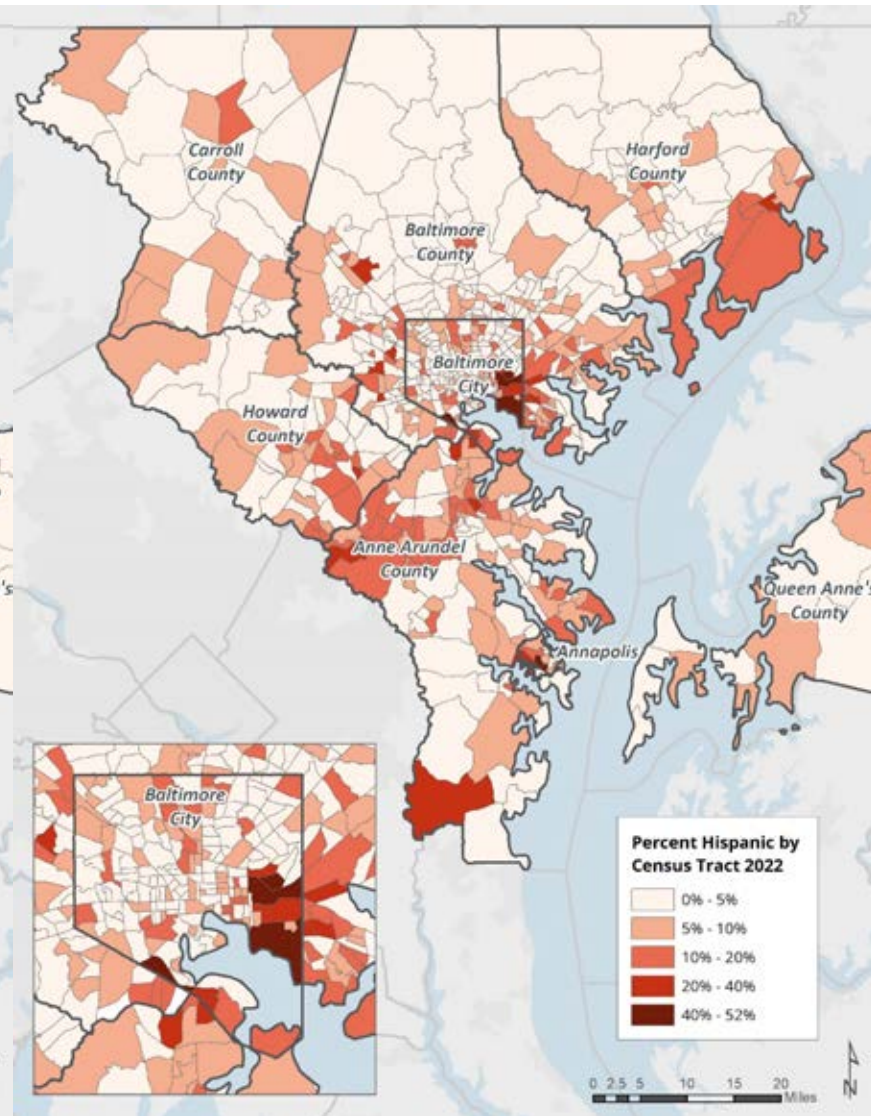
Source: 2022 5-year ACS.

**Figure III-14a.**  
**Percent Hispanic by Census Tract, 2016**



Source: 2016 5-year ACS.

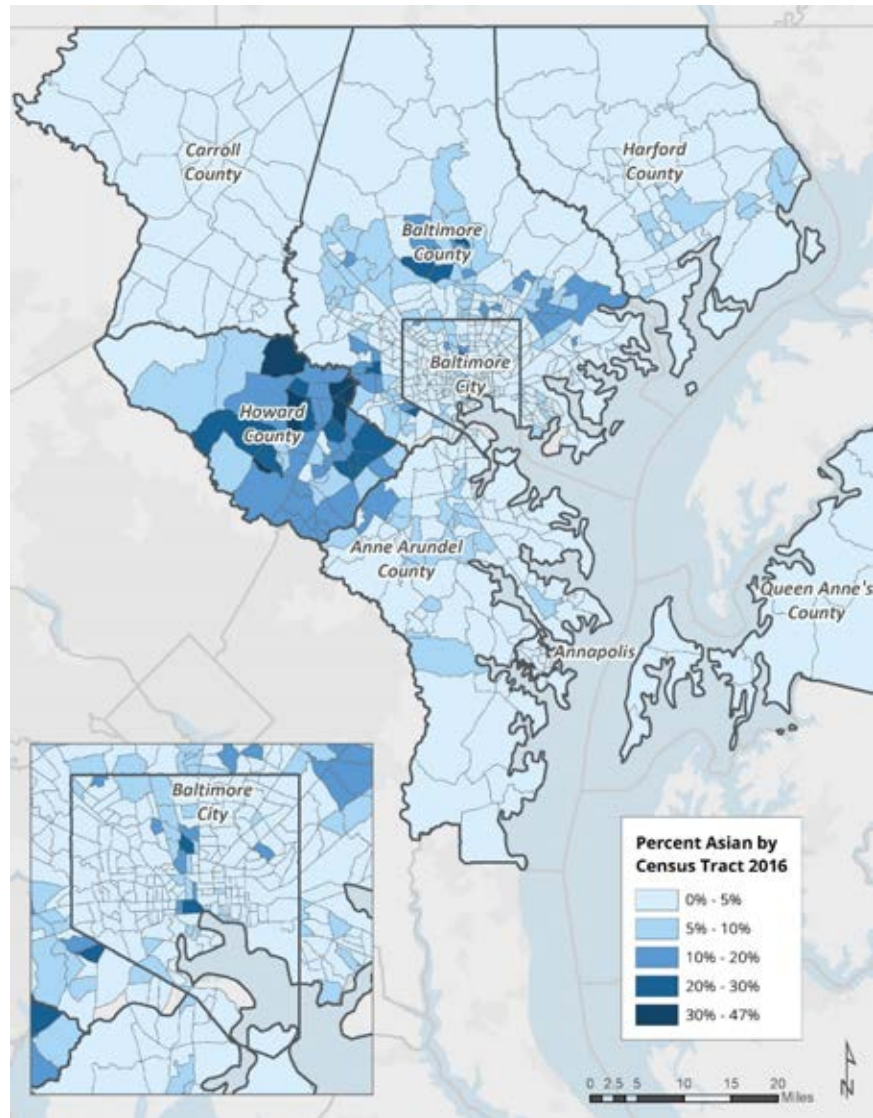
**Figure III-14b.**  
**Percent Hispanic by Census Tract, 2022**



Source: 2022 5-year ACS.

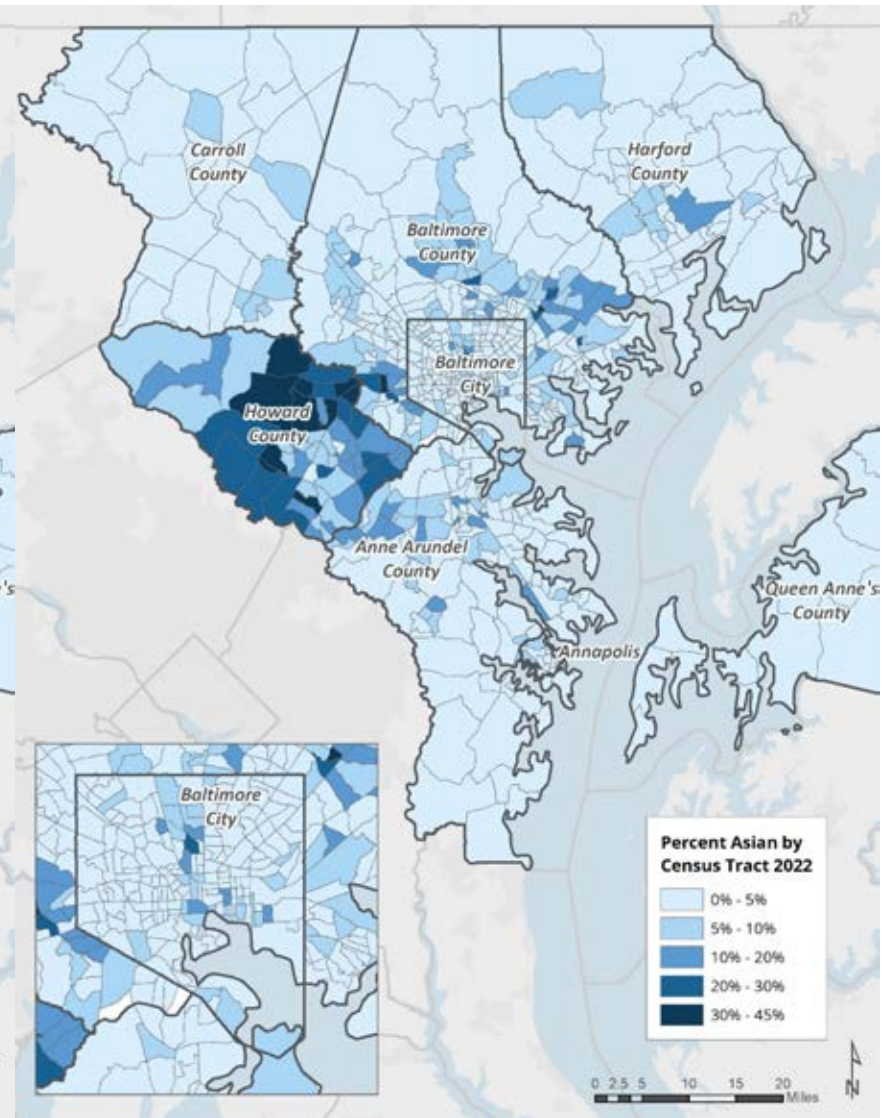


**Figure III-15a.**  
Percent Asian by Census Tract, 2016



Source: 2016 5-year ACS.

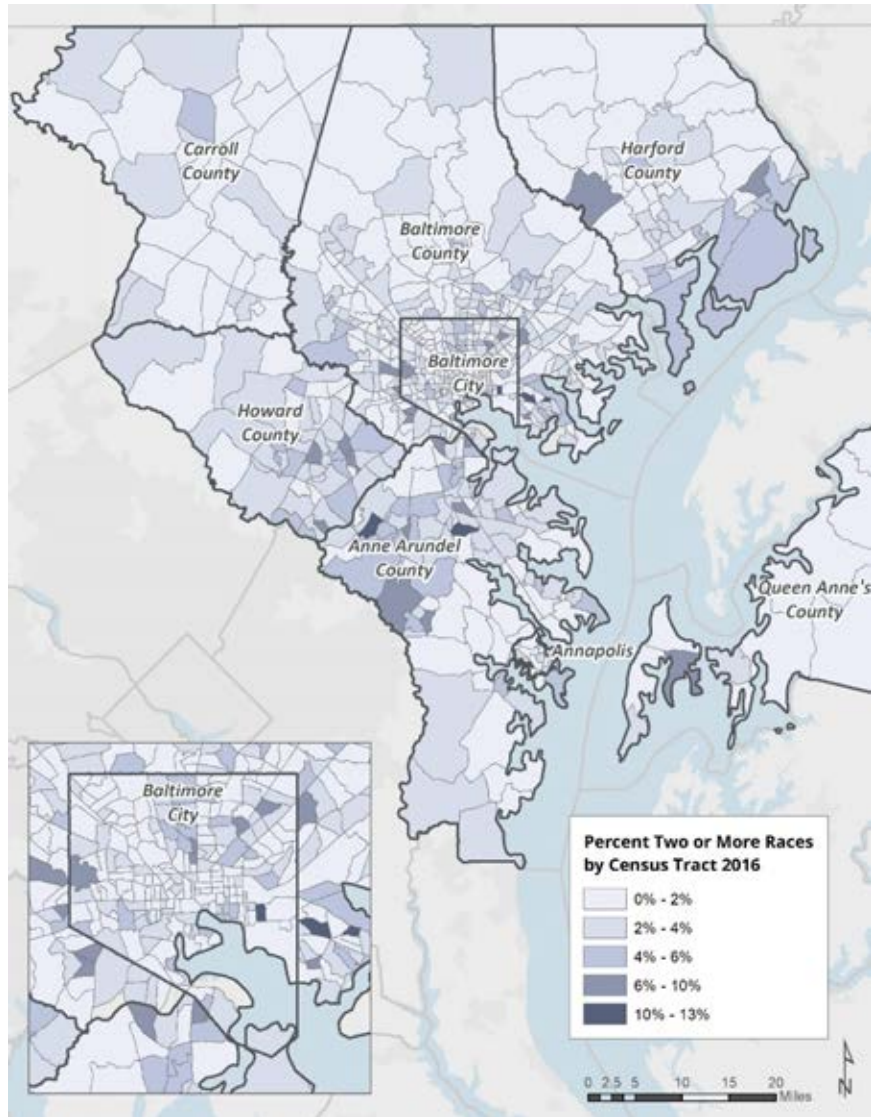
**Figure III-15b.**  
Percent Asian by Census Tract, 2022



Source: 2022 5-year ACS.

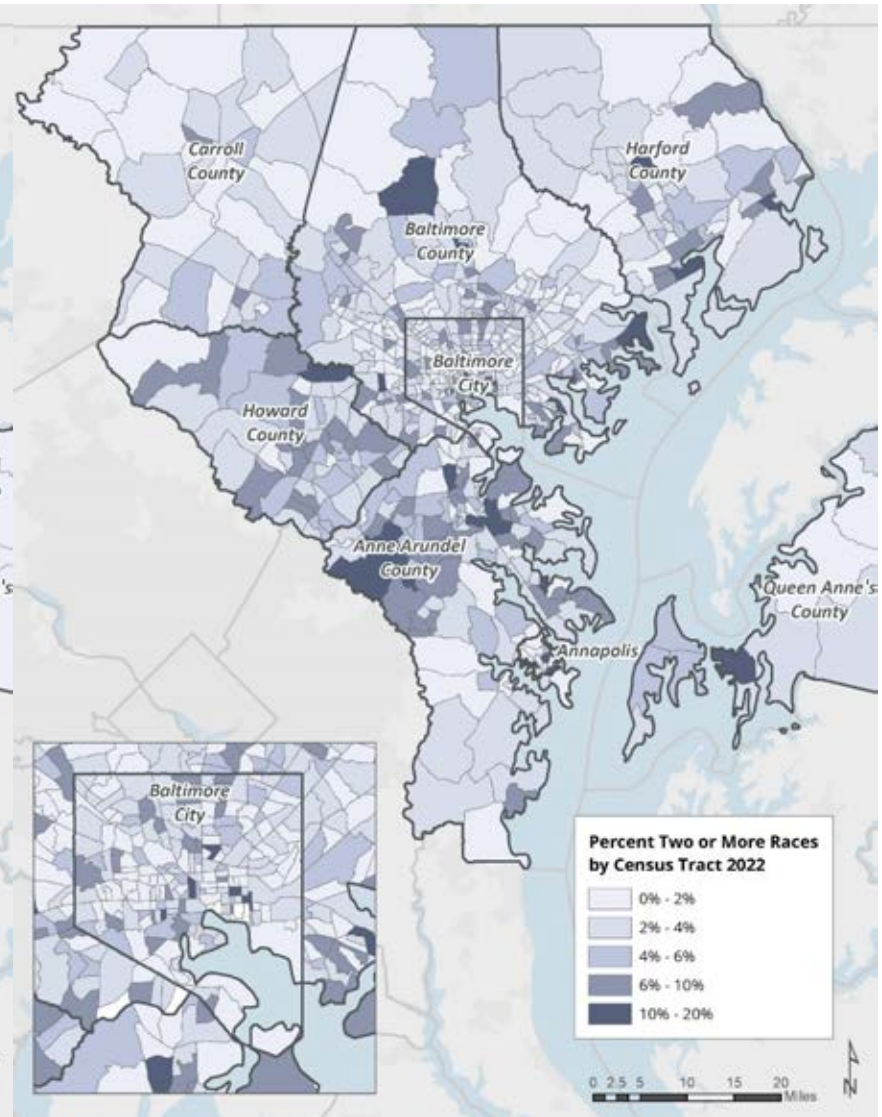


**Figure III-16a.**  
**Percent Two or More Races by Census Tract, 2016**



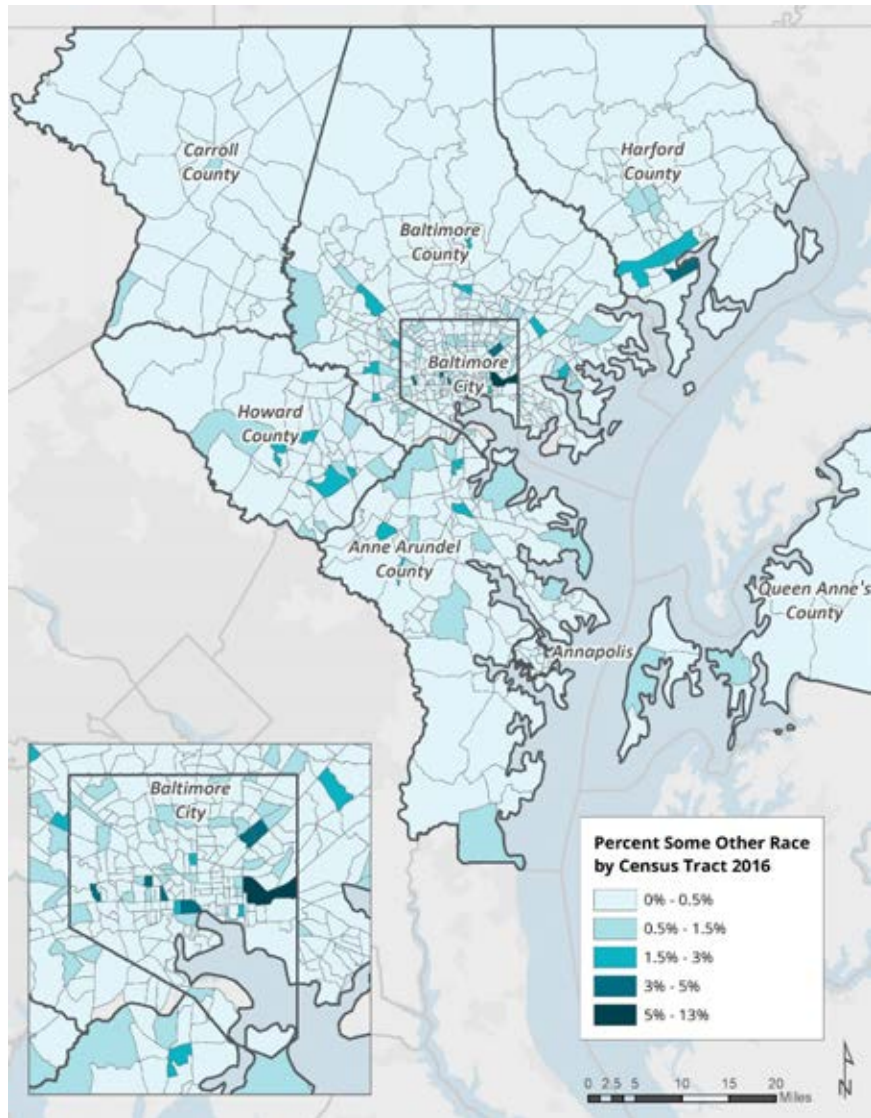
Source: 2016 5-year ACS.

**Figure III-16b.**  
**Percent Two or More Races by Census Tract, 2022**



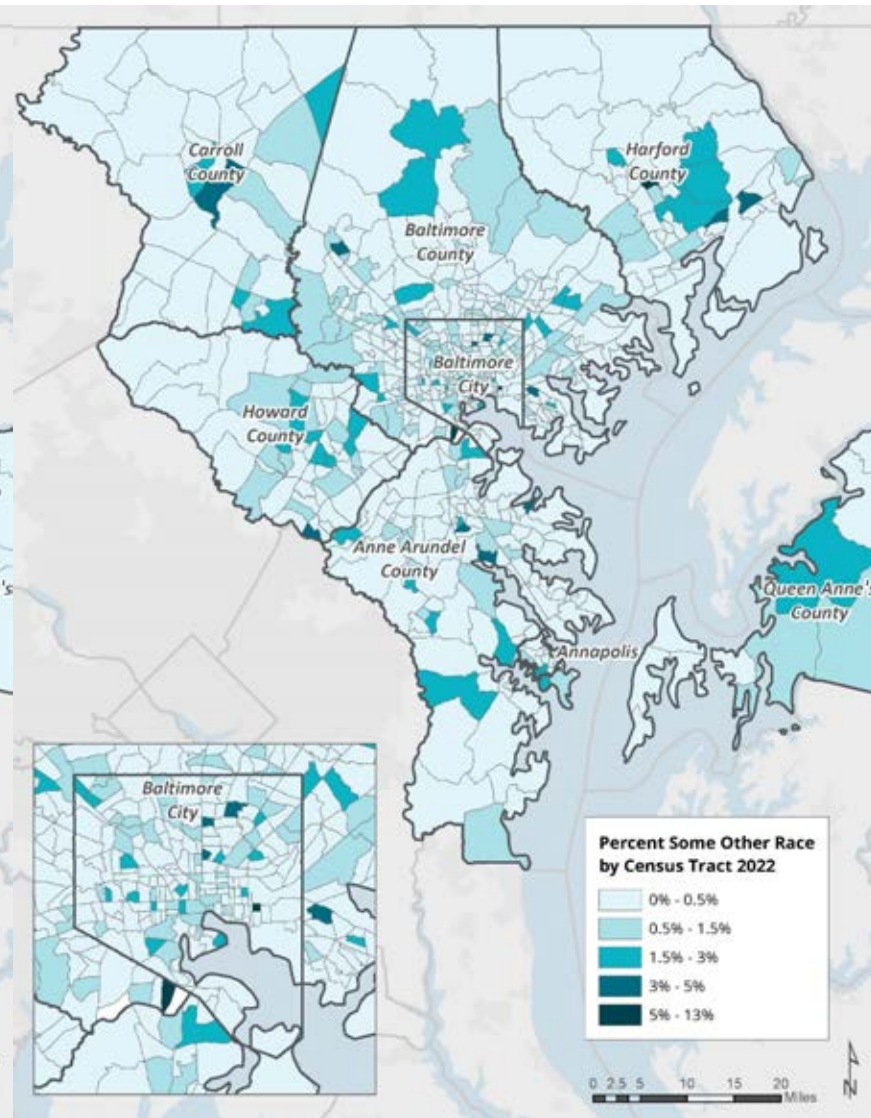
Source: 2022 5-year ACS.

**Figure III-17a.**  
**Percent Some Other Race by Census Tract, 2016**



Source: 2016 5-year ACS.

**Figure III-17b.**  
**Percent Some Other Race by Census Tract, 2022**



Source: 2022 5-year ACS.

**Severity of segregation.** A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents a “score” where values between 0 and 39 indicate low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

It is important to note that the DI is a broad index and should be interpreted as a starting point for understanding the magnitude of segregation. Like all indices, the DI has some weaknesses: first, the DI provided by HUD uses Non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the distribution of Non-Hispanic White residents.

Another limitation of the DI is that it can conceal practices that lead to racial and ethnic exclusion. Communities without much racial diversity typically have very low dissimilarity indices, while counties with the most racial diversity will show high levels of dissimilarity. Thus, a “low” dissimilarity index for a jurisdiction might indicate that racial and ethnic minorities face barriers to entry in a community. These limitations are not significant for this study—all jurisdictions included have a Non-White population equal to at least 25% of total population—however, the limitations are noted here to acknowledge that the DI is just one of many measures to understand the extent of segregation

Figure III-18 shows trends in the DI for the Baltimore region. Non-White/White segregation has declined since 1990, from high segregation levels to moderate segregation levels. Black/White segregation is high each year but has improved modestly since 1990. Hispanic/White and Asian/White segregation increased from low to moderate since 1990, suggesting that as these populations grew in numbers they migrated into areas that had similar racial groups.

**Figure III-18.**  
**Dissimilarity Index Trends, Baltimore Region, 1990–2022**

Racial/Ethnic Dissimilarity Index	Baltimore Metro Area					Interpreting the index:
	1990	2000	2010	2016	2022	
Non-White/White	64.7	59.6	54.2	52.5	48.6	<div>0-39 Low Segregation</div> <div>40-54 Moderate Segregation</div> <div>55-100 High Segregation</div>
Black/White	71.1	67.5	64.3	64.2	61.9	
Hispanic/White	30.1	35.8	39.8	43.7	43.2	
Asian/White	38.4	39.3	41.0	47.4	49.0	

Source: HUD AFFH Tables, 2016 and 2022 5-year ACS estimates, and Root Policy Research.

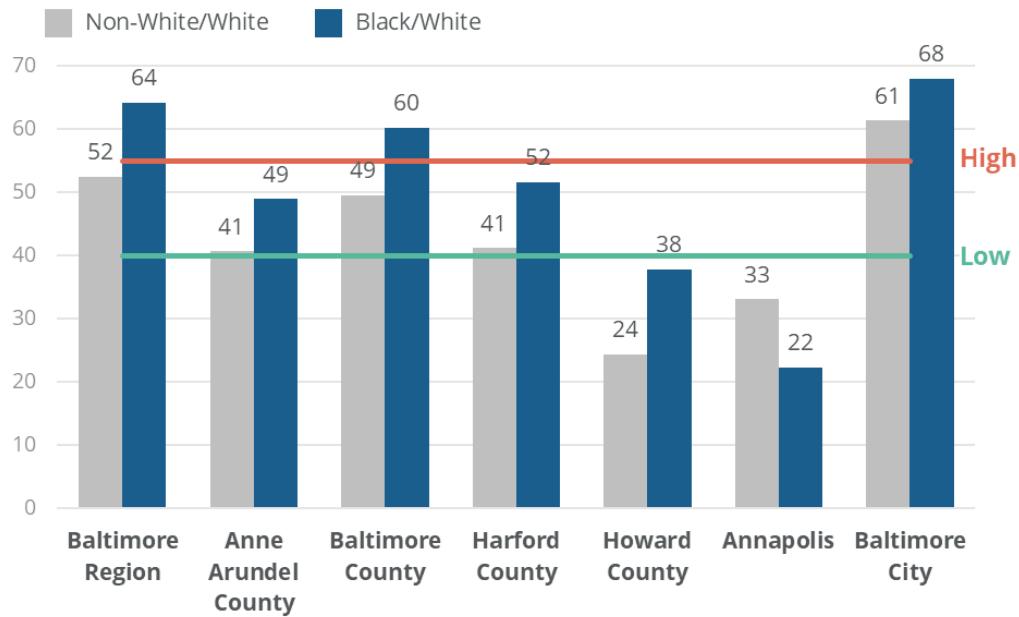


Figure III-19 shows the Non-White/White and Black/White DI for each jurisdiction. In 2022, the Non-White/White DI is moderate in the Baltimore region overall. Non-White/White segregation is low in Anne Arundel County, Harford County, Howard County, and Annapolis; moderate in Baltimore County; and high in Baltimore City. Black/White segregation is high in the Baltimore region. The Black/White DI is high in Baltimore County and Baltimore City, moderate in Harford and Anne Arundel counties, and low in Howard County and Annapolis.

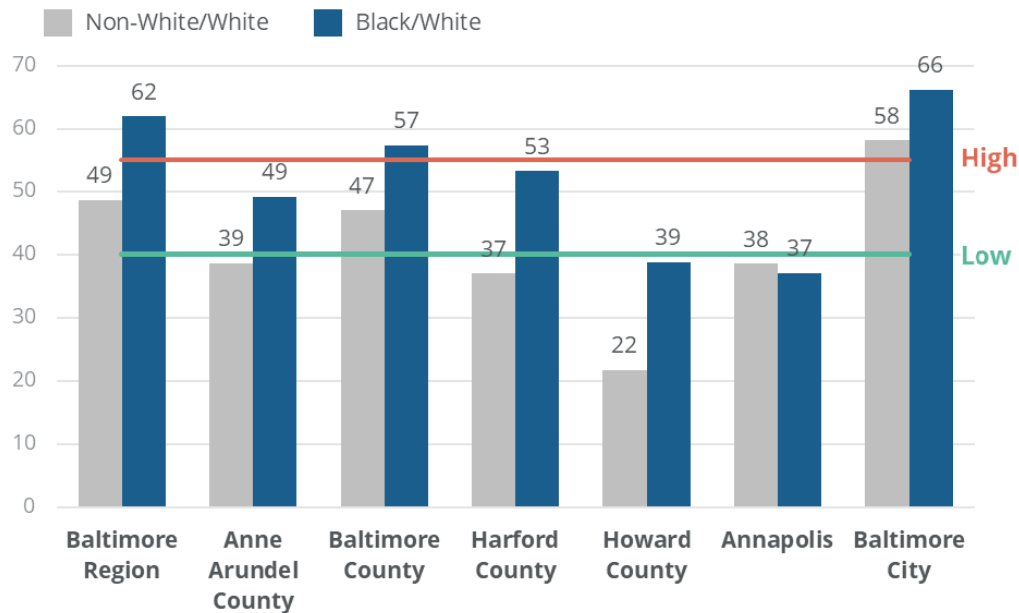
The Baltimore region has seen decreases in both Non-White/White and Black/White DIs since 2016 indicating slight desegregation overall. The Non-White/White DI has decreased indicating decreasing segregation in all jurisdictions except for Annapolis where it increased by five points. The Black/White DI has decreased in Baltimore County and Baltimore City indicating lessened segregation, remained stable in Anne Arundel County, increased by one point in Harford and Howard counties, and increased by fifteen points in Annapolis indicating substantially increased segregation. Note, however, that Annapolis continues to have the lowest Black/White DI of any jurisdiction studied.

**Figure III-19.**  
**Dissimilarity Index, Baltimore Region and by Jurisdiction, 2016 and 2022**

**2016**



**2022**



Source: 2016 and 2022 5-year ACS estimates and Root Policy Research.

Population groups can also be segregated if their distribution is arranged in a way that minimizes exposure to majority members. A basic measure of exposure is the interaction index, which measures the extent to which members of a minority group are exposed to members of the majority group—in this case, Non-Hispanic White residents as they are the largest racial or ethnic group in the region. The interaction index is interpreted as the probability that a randomly drawn minority member shares an area with a majority member. It ranges from 0 to 100, and lower values of interaction tend to indicate higher levels of segregation.

Figure III-20 presents interaction indices for the largest racial and ethnic groups in the Baltimore region and by jurisdiction.

Regional interaction indices decreased, indicating increased segregation, for Hispanic and Asian residents in the region and in each jurisdiction between 2010 and 2022. For the region overall, interaction indices remained constant for Black/African American residents and residents of color, indicating that these residents are as likely to share an area with Non-Hispanic White residents as they were in 2010.

Interaction indices decreased for Black/African American residents and residents of color, indicating increased segregation for these groups in Anne Arundel County, Baltimore County, Harford County, Howard County, and Annapolis.

Black/White interaction increased very slightly (from 12.7 to 13.4) in Baltimore City, suggesting a slight decrease in segregation—and improvement in interaction probability—between Black and White residents.

In 2022, the region's Asian residents were most likely to share an area with Non-Hispanic White residents, followed by Hispanic residents. This was also true in most jurisdictions. Black/African American residents were least likely to share an area with Non-Hispanic White residents in the region overall and in each jurisdiction—consistent with the high DI segregation rating for these groups.

**Figure III-20.  
Interaction Index,  
Baltimore Region  
and by Jurisdiction,  
2010 and 2022**

Note:

The interaction index ranges from 0 to 100, with lower values indicating higher levels of segregation.

Source:

2010 and 2022 5-year ACS estimates and Root Policy Research.

Racial/Ethnic Interaction Index	Non- White/ White	Black/ White	Hispanic/ White	Asian/ White
<b>2010</b>				
<b>Baltimore Region</b>	37	28	57	63
<b>Anne Arundel County</b>	59	55	62	66
<b>Baltimore City</b>	16	13	42	52
<b>Baltimore County</b>	42	34	57	63
<b>Harford County</b>	65	62	69	76
<b>Howard County</b>	57	53	55	61
<b>Annapolis</b>	53	53	51	62
<b>2022</b>				
<b>Baltimore Region</b>	37	28	50	52
<b>Anne Arundel County</b>	53	47	55	56
<b>Baltimore City</b>	17	13	36	47
<b>Baltimore County</b>	38	31	47	50
<b>Harford County</b>	61	55	66	73
<b>Howard County</b>	45	41	42	48
<b>Annapolis</b>	48	49	43	55

An alternative measure of exposure is the isolation index, which measures the extent to which minority members are exposed to *only one another*. The isolation index is interpreted as the probability that a randomly drawn member of a certain race or ethnic group shares an area with a member of the same group: it ranges from 0 to 100 and higher values of isolation tend to indicate higher levels of segregation. Figure III-21 presents isolation indices for the largest racial and ethnic groups in the Baltimore region and by jurisdiction.

At the regional level and in all jurisdictions, isolation decreased for Non-Hispanic White residents between 2010 and 2022. This means that Non-Hispanic White residents are more likely to be exposed to people of color in 2022 than they were in 2010. Isolation also decreased for Black/African American residents in the Baltimore region, indicating that Black/African American residents are now more likely to be exposed to residents of other races at the regional level.<sup>7</sup> This was true for Black/African American residents of

<sup>7</sup> Because interaction between Black and Non-Hispanic White residents was mostly constant between 2010 and 2022, the decrease in isolation for Black residents is likely due to increased interaction with other residents of color.

Baltimore City and Baltimore County, while Black/African American residents in all other jurisdictions have seen increased isolation since 2010.

As expected given widespread decreases in interaction between Hispanic/White and Asian/White residents, isolation indices increased for Hispanic and Asian residents in the region overall and in each jurisdiction.<sup>8</sup> Hispanic and Asian residents across the Baltimore region have become more isolated since 2010.

**Figure III-21.**  
**Isolation Index,**  
**Baltimore Region**  
**and by Jurisdiction,**  
**2010 and 2022**

Note:

The isolation index ranges from 0 to 100, with higher values indicating higher levels of segregation.

Source:

2010 and 2022 5-year ACS estimates and Root Policy Research.

Racial/Ethnic Isolation Index	NH White	Non-White	Black	Hispanic	Asian
<b>2010</b>					
<b>Baltimore Region</b>	77	63	63	10	11
<b>Anne Arundel County</b>	79	41	29	11	6
<b>Baltimore City</b>	59	84	82	17	10
<b>Baltimore County</b>	77	58	55	7	9
<b>Harford County</b>	84	35	28	7	4
<b>Howard County</b>	65	43	25	9	18
<b>Annapolis</b>	67	47	26	20	3
<b>2022</b>					
<b>Baltimore Region</b>	69	63	58	13	15
<b>Anne Arundel County</b>	71	47	32	15	7
<b>Baltimore City</b>	53	83	78	17	9
<b>Baltimore County</b>	68	62	53	11	12
<b>Harford County</b>	78	39	31	8	5
<b>Howard County</b>	52	55	29	13	24
<b>Annapolis</b>	65	52	27	30	5

## Economic Segregation

A growing body of research has consistently found that reducing economic segregation, especially for young children, has long-term, positive outcomes for families and decreases the public sector costs of addressing the consequences of poverty.

A June 2015 report—*Worlds Apart: Inequality between America's Most and Least Affluent Neighborhoods*—from Urban Institute found that the Baltimore region is one of the top

<sup>8</sup> An exception is found in isolation indices for Asian residents of Baltimore City. These residents saw a slight decrease in isolation, indicating increased exposure to residents of other racial and ethnic groups, since 2010.



areas for economic inequality, based on neighborhood disparities. The region was one of five areas with the highest inequality score, along with Columbus, Dallas, Houston, and Philadelphia.

A 2021 study on the disparities in wealth in Baltimore—*The Color of Wealth in Baltimore* from the Samuel DeBois Cook Center on Social Equity at Duke University—found “drastic differences” in the method of wealth accumulation between Black/African American and White households. White households are more likely to have retirement assets, including stocks and mutual funds, and home equity, that are larger and appreciate faster, generating even more wealth. White households also have higher rates of intergenerational wealth transfer.

The table below examines the distribution of the region’s low income households—roughly those earning less than \$25,000—among jurisdiction, compared to the share of the region’s total households. Where a jurisdiction’s share of the region’s low income households exceeds its share of the region’s total households, low income households are overrepresented in the jurisdiction. The analysis is conducted for total households, family households, and nonfamily households to determine whether inequality varies by household type.

Low income households—including both family and nonfamily households—are significantly overrepresented relative to total households in Baltimore City. While Baltimore City is home to 24% of the region’s households, it is home to 43% of the region’s households earning less than \$25,000. Low income family and non-family households are underrepresented in all other jurisdictions, except for nonfamily households in Harford County where its share of the region’s total nonfamily households equals its share of the region’s low income nonfamily households.

Underrepresentation of low income households is most significant in Anne Arundel County, followed closely by Howard County. Anne Arundel County is home to 22% of the region’s households but only 14% of the region’s low income households. Note that these representational disparities are present for both family and nonfamily households, but are generally more pronounced for family households than for nonfamily households.

**Figure III-22.**  
**Share of Very Low Income Households, Families, and Non-families,**  
**Baltimore Region and by Jurisdiction, 2022**

	Households				
	All Households	% of All	< \$25,000	% of <	Over/under
		Households	Households	\$25,000	representation
				Households	of < \$25,000
					Households
Region	1,041,381	100%	149,895	100%	
Anne Arundel County	226,285	22%	20,547	14%	-8%
Baltimore County	337,529	32%	45,466	30%	-2%
Harford County	101,437	10%	11,534	8%	-2%
Howard County	121,423	12%	7,579	5%	-7%
Baltimore City	254,707	24%	64,769	43%	19%
	Families				
	All Families	% of All	< \$25,000	% of <	Over/under
		Families	Families	\$25,000	representation
				Families	of < \$25,000
					Families
Region	645,798	100%	51,081	100%	
Anne Arundel County	152,454	24%	7,260	14%	-9%
Baltimore County	213,980	33%	18,284	36%	3%
Harford County	69,886	11%	4,020	8%	-3%
Howard County	87,602	14%	2,847	6%	-8%
Baltimore City	121,876	19%	18,670	37%	18%
	Nonfamilies				
	All Nonfamilies	% of All	< \$25,000	% of <	Over/under
		Nonfamilies	Nonfamilies	\$25,000	representation
				Nonfamilies	of < \$25,000
					Nonfamilies
Region	395,583	100%	104,392	100%	
Anne Arundel County	73,831	19%	14,345	14%	-5%
Baltimore County	123,549	31%	29,726	28%	-3%
Harford County	31,551	8%	8,048	8%	0%
Howard County	33,821	9%	5,247	5%	-4%
Baltimore City	132,831	34%	47,026	45%	11%

Source: 2022 1-year ACS.

The maps in the following figure show the distribution of poverty—corresponding roughly to the “<\$25,000” households captured in the table above—among the region’s Census tracts in 2016 and 2022. In 2022 as in 2016, the region’s high-poverty Census tracts are concentrated in Baltimore City. As the city’s overall individual poverty rate decreased from 23% in 2016 to 20% in 2022, poverty within the city has

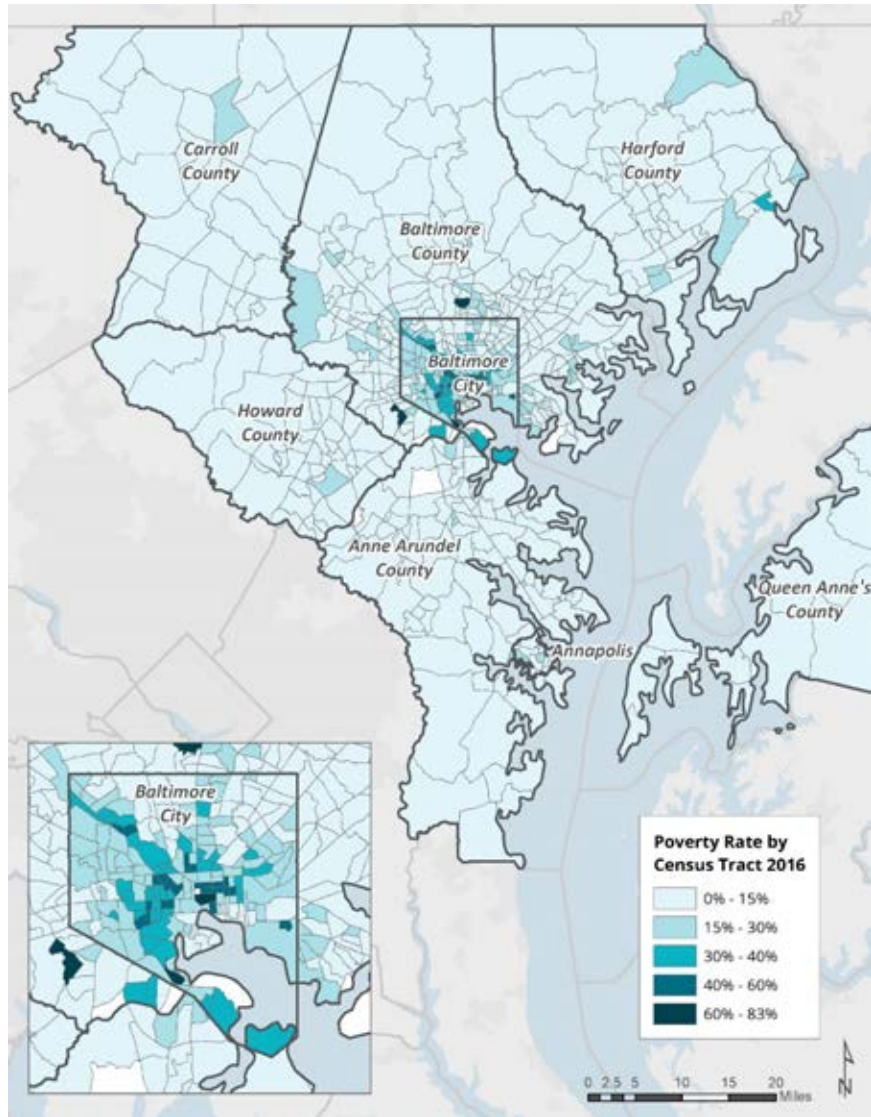
deconcentrated.<sup>9</sup> Moderate to high poverty areas within the counties—including high poverty areas driven by college student populations near universities in Baltimore County—have seen minimal change since 2016. Poverty remains very low elsewhere in the region.

About 73% of the region's Census tracts have poverty rates of less than 15%—the level at which research has shown there are no noticeable negative effects on community opportunity.

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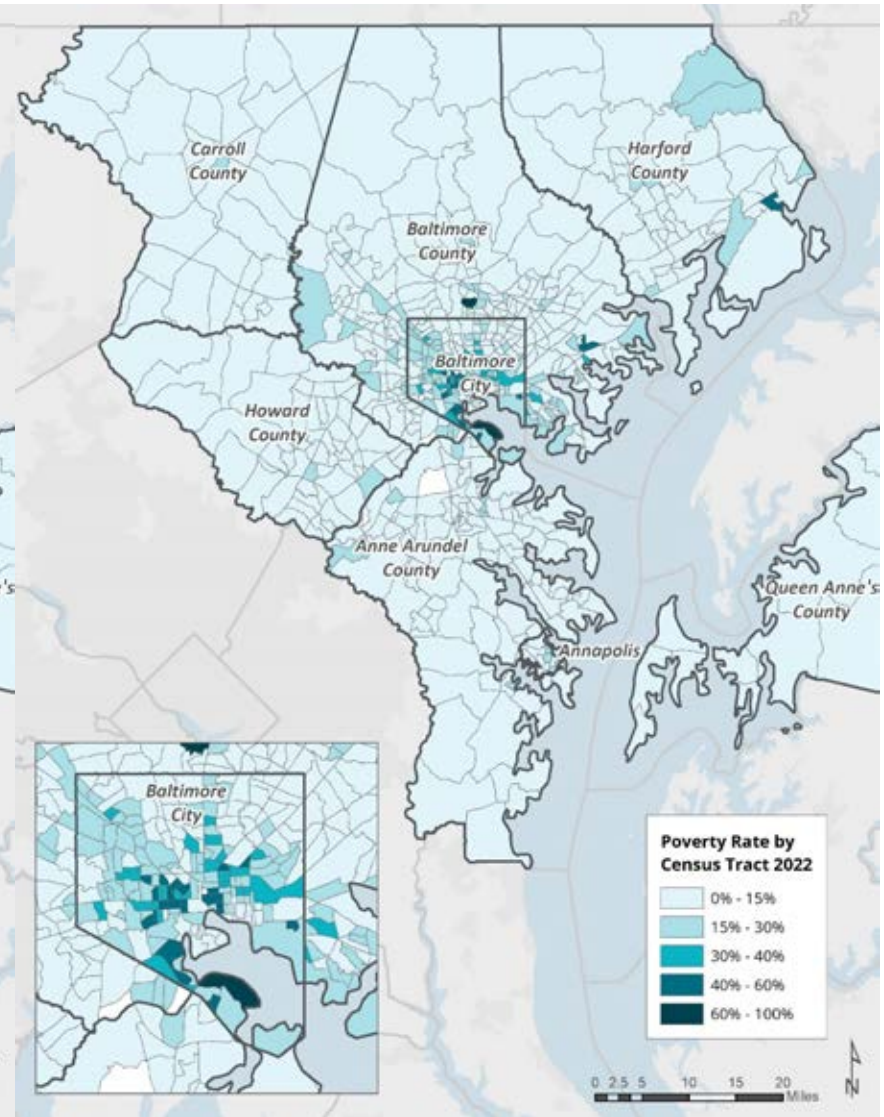
<sup>9</sup> 5-year ACS data is presented here to be consistent with the 5-year ACS data presented on the following page. Trends are similar in 1-year ACS data, which show the city's poverty rate to have decreased from 22% to 19%.

**Figure III-23a.**  
Poverty by Census Tract, 2016



Source: 2016 5-year ACS.

**Figure III-23b.**  
Poverty by Census Tract, 2022



Source: 2022 5-year ACS.

## Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history of racial and ethnic segregation, which, as discussed in the beginning of this section, often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A census tract that has a non-white population of 50 percent or more (majority-minority) and
- A census tract where the poverty rate is at least either 40 percent or three times the average tract poverty rate for the metropolitan area, whichever is lower. In the Baltimore region, three times the average tract poverty rate is 36.6%, so this analysis uses that threshold.

**Why R/ECAPs matter.** The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes “socially and economically dysfunctional.” Conversely, research has shown that areas with poverty rates up to 14% have no noticeable effect on community opportunity.<sup>10</sup>

In the Baltimore metropolitan area, R/ECAPs also correspond remarkably closely with areas that received the yellow and red “hazardous” ratings in the 1937 Home Owners Loan Corporation map in Figure III-1.<sup>11</sup>

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination makes R/ECAP households likely to be susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

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<sup>10</sup> The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

<sup>11</sup> This is true in many metropolitan areas, yet not always the case. Some neighborhoods are able to recover from past redlining and concentrated poverty faster than others.

It is very important to note that many R/ECAPs, while not economically wealthy, are rich in culture and community. R/ECAPs are not meant to cast broad judgments on an area, but rather to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

**R/ECAP trends.** The maps on the following page present R/ECAPs in the Baltimore region in 2016 and 2022. Analysis of 2022 American Community Survey (ACS) data shows 30 R/ECAPs in the Baltimore region. This count is largely unchanged from 2016 when data showed 29 R/ECAPs in the region but represents an increase from the 26 R/ECAPs found in 2010.<sup>12</sup> The number of R/ECAPs in the region has dropped considerably since 2000, when there were 42.<sup>13</sup>

The map also shows “edge” R/ECAPs for both years. Edge R/ECAPs are approaching R/ECAP status: they have 80-99 percent of the threshold poverty level of R/ECAPs and have majority-minority populations. Change in Edge R/ECAPs has been far more pronounced than change in R/ECAPs overall since 2016—the Baltimore region had 21 Edge R/ECAPs in 2022, down from 34 Edge R/ECAPs in 2016. This indicates that relative to 2016, far fewer areas are at risk of becoming R/ECAPs if trends in poverty continue.

Since 2016, West Baltimore has seen an increase in R/ECAP concentrations, and a decrease in Edge R/ECAPs.

Unlike in 2016, in 2022, R/ECAPs now exist in two census tracts outside of Baltimore City: one in the Middle River area of Baltimore County and one that includes the City of Aberdeen in Harford County.

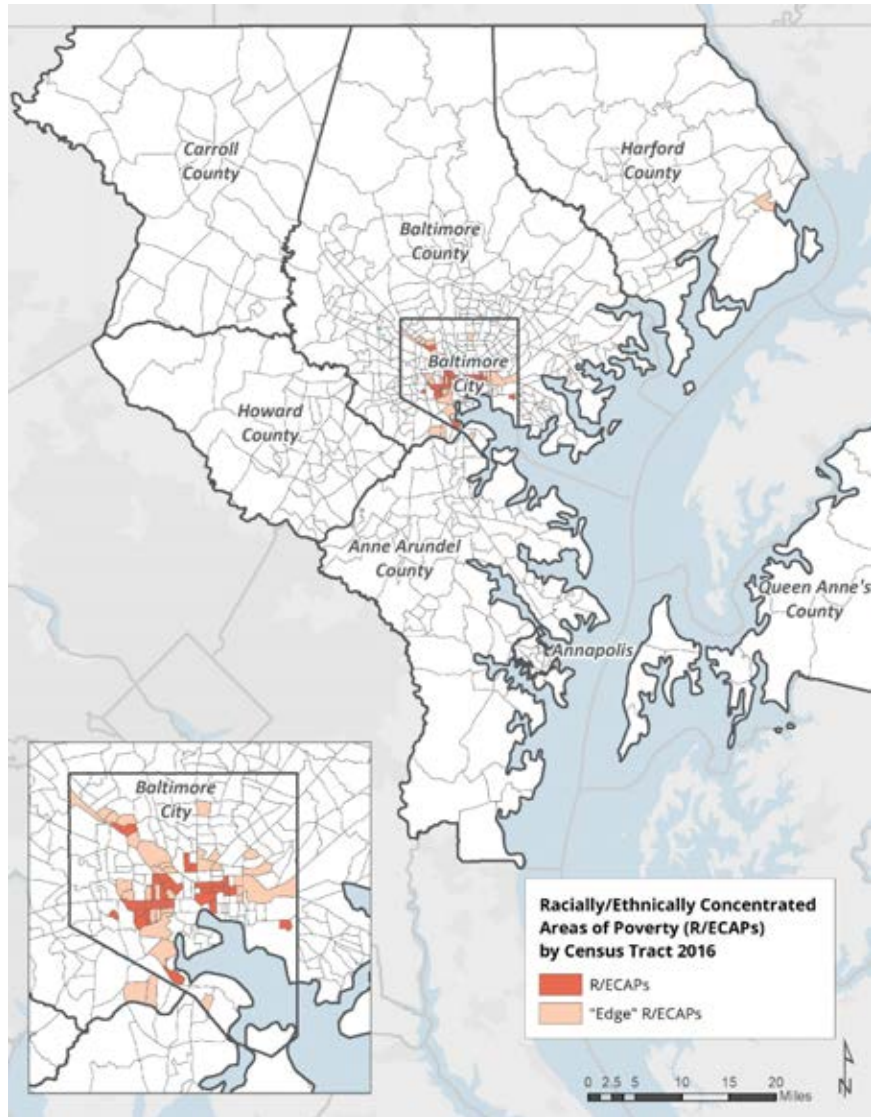
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<sup>12</sup> 2014 Regional Housing Plan.

<sup>13</sup> 2014 Regional Housing Plan.

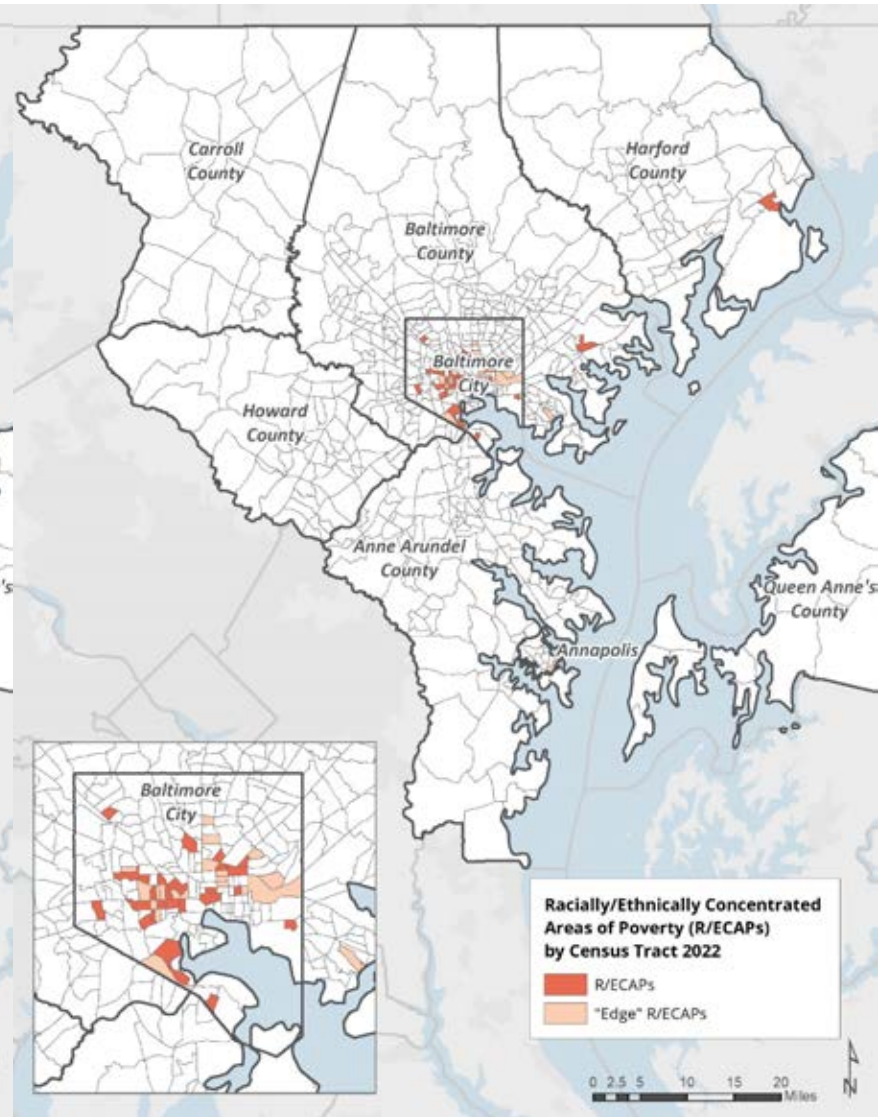


**Figure III-24a.**  
**R/ECAPs and Edge R/ECAPs, 2016**



Source: 2016 5-year ACS.

**Figure III-24b.**  
**R/ECAPs and Edge R/ECAPs, 2022**



Source: 2022 5-year ACS.

**Characteristics of R/ECAPs.** The following table presents demographic characteristics of R/ECAP residents alongside demographic characteristics of the regional population.

Nearly 74,000 Baltimore region residents live in R/ECAPs. African American residents are significantly overrepresented in the region’s R/ECAPs, constituting 76% of the total R/ECAP population but only 31% of the region’s population. By contrast, Non-Hispanic White residents constitute 50% of the region’s population and only 13% of the R/ECAP population and are under-represented in R/ECAPs.<sup>14</sup> Hispanic residents, Asian residents, and residents identifying as other races are also under-represented in the R/ECAP population, but by much smaller margins.

Compared to families in the Baltimore region overall, families in the Baltimore region’s R/ECAP tracts are more likely to have children. Half of families in R/ECAPs have children, compared to 42% of families in the Baltimore region.

Residents of R/ECAPs are more likely than residents of the Baltimore region overall to have been born in the United States: 8.3% of R/ECAP residents were born in a foreign country compared to 11.2% of Baltimore region residents.

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<sup>14</sup> Some of this difference may be explained by racial differences in concentrations of poverty. The 2014 Regional Housing Plan notes that poor Non-Hispanic White residents in the region were twice as likely as poor African Americans to live in suburban jurisdictions: 78 percent of White residents living in poverty lived in suburban (and lower poverty) areas compared to 30 percent of African American residents experiencing poverty.



**Figure III-25.**  
**R/ECAP Demographics, Baltimore Region, 2022**

	R/ECAPs		Baltimore Region	
Race/Ethnicity	#	%	#	%
Total Population	73,745	-	2,608,656	-
NH White	9,408	13%	1,305,632	50%
NH Black	55,699	76%	807,154	31%
Hispanic	3,478	5%	188,143	7%
NH Asian or Pacific Islander	2,134	3%	167,501	6%
NH Native American	40	0%	2,874	0%
Other, Non-Hispanic	2,986	4%	137,352	5%
<b>Family Type</b>				
Total Families	14,666		645,798	
Families with children	7,417	51%	272,341	42%
<b>National Origin</b>				
Total Population	73,745		2,608,656	
Total Foreign-Born Population	6,129	8.31%	291,056	11.16%
#1 country of origin	Nigeria	706 0.96%	India	25,369 0.97%
#2 country of origin	Sudan	401 0.54%	Nigeria	21,282 0.82%
#3 country of origin	China*	372 0.50%	El Salvador	16,448 0.63%
#4 country of origin	India	369 0.50%	Korea	15,945 0.61%
#5 country of origin	El Salvador	344 0.47%	China*	14,847 0.57%
#6 country of origin	Mexico	317 0.43%	Philippines	13,705 0.53%
#7 country of origin	Yemen	269 0.36%	Mexico	9,297 0.36%
#8 country of origin	Senegal	207 0.28%	Jamaica	8,363 0.32%
#9 country of origin	Honduras	195 0.26%	Pakistan	7,639 0.29%
#10 country of origin	Indonesia	172 0.23%	Guatemala	6,746 0.26%
<p>Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.</p> <p>Note 2: Data Source: ACS Estimates. 1-year estimates are used where possible (Baltimore Region Race/Ethnicity and Family Type); 5-year estimates are presented elsewhere.</p> <p>Note 3: In this estimate, China excludes Taiwan and Hong Kong.</p>				

## SECTION IV.

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### ACCESS TO COMMUNITY ASSETS

## SECTION IV.

# Access to Community Assets

This section focuses on the areas that heavily influence economic outcomes for children and families—access to healthy communities, high quality education, and economic opportunity. It updates the analysis in our 2020 Analysis of Impediments to Fair Housing Choice in the Baltimore region with currently available data. Key community assets linked to opportunity that are explored in this section include:

- Built and social environment: environmentally healthy neighborhoods;
- High quality education;
- Employment and economic opportunity; and
- Geographic and digital connection.

A substantial body of social science research links the economic outcomes of adults to the built and social environments of the neighborhoods in which they were raised as children. The story of opportunity in the Baltimore region therefore necessarily begins with the built environment. In the Baltimore region, education and employment disparities can serve as barriers to opportunity for certain groups with protected characteristics.

## Primary Findings

### **Built and Social Environment: Healthy Neighborhoods**

- Census tracts that have high levels of environmental toxic exposures including particulate matter, proximity to hazardous waste and Superfund sites, correlate closely with communities that have high populations of groups with protected characteristics;
- Baltimore City communities that are majority Black/African American have a high number of 3-1-1 calls reporting missed trash pickups, and storm water drainage issues which lead to a variety of negative health consequences including increased mold and exposure to disease from rodents;
- Stakeholders actively engaged in identifying barriers to housing choice for renters report that a significant burden falls on renters to report uninhabitable housing, particularly mold including the cost of inspection and alternative living arrangements during remediation. This burden is greatest in jurisdictions where housing inspections are infrequent or not required by rental registries. If an inspection/rental license is required, proof of compliance with the licensing law is a prerequisite to using the courts to evict a tenant, and demanding payment for rent for an unlicensed property is a consumer protection violation. Owners of properties that are not covered by

inspection and licensing requirements have no financial incentive to maintain their properties in a safe manner; and

- The Baltimore region's lower income, majority minority communities have little to no tree canopy compared to higher income, non-Hispanic White neighborhoods resulting in higher utility costs, higher risk of heatstroke and related conditions, and greater risk of asthma for residents.

## **Education**

- Black/African American and Hispanic students are disproportionately represented in schools with lower ratings and with higher concentrations of low-income students across all counties;
- Funding in Baltimore City Schools per student is inadequate to achieve similar levels of education as those available to higher income student populations, disproportionately impacting students of color who are overrepresented in Baltimore City Schools;
- Special education and English Language Learners (ELL) are overrepresented in lower rating schools;
- School boundaries in the 2022-2023 school year tend to group lower income Black and Hispanic students into schools with lower ratings. Responses to this could include desegregation focused boundary changes and housing planning efforts including possible rezoning and affordable housing development;
- Chronic absenteeism and mobility rates as contributors to academic success are significant in neighborhoods with high-cost burden, indicating housing instability. These neighborhoods are also lower income and are majority people of color; and
- The City of Baltimore has a high percentage of "opportunity youth" (defined as 16–24-year-olds who are neither working nor enrolled in school) relative to the surrounding areas, indicating a need for post-graduation outreach and increased funding for school counselors.
- The Adequate Public Facilities Ordinance (APFO), which delays residential development due to school capacity concerns, can lock lower-income families out of accessing schools with better resources. APFO has a disproportionate impact on families who rent and cannot afford to "buy into" a closed school district and these are disproportionately Black and Latino families. Addressing jurisdiction APFO restrictions, including potentially allowing exemptions for affordable housing developments (exemptions or waivers that do currently exist in some jurisdictions), would not only address housing affordability challenges in the region—it would also facilitate more equitable access to schools in communities of choice.

## **Economic Opportunity**

- Baltimore City has a large percentage of in-commuters who are highly educated and higher income, as 86% of the city's job share are careers requiring a college degree;

- Based on the Massachusetts Institute of Technology's Living Wage Calculator and American Community Survey median income estimates by education attainment, a single mother would need a graduate degree to afford to live in the Baltimore region and a single woman would need at least a bachelor's degree;
- Unemployment rates are highest and labor engagement is lowest in Baltimore City's census tracts that are majority minority;
- Hispanic students have the lowest rate of college attendance 24 months post high school graduation in Baltimore City, followed by Black/African American students. Hispanic college attendance rates are highest in Harford County and Black/African American college attendance rates are highest in Howard County;
- English Language Learner (ELL) students have very low graduation rates across all counties and the City of Baltimore has the lowest graduation rates across all groups;
- Access to bricks and mortar banking institutions are lacking in the City of Baltimore's majority Black neighborhoods relative to non-Hispanic White, higher income neighborhoods creating a barrier to accessing capital;
- Black/African American owned businesses are profoundly underrepresented across the Baltimore Metropolitan Statistical Area; and
- The Baltimore region's workforce development programs have reached only a small percentage of residents in need of skills, certifications and career counseling.

### **Geographic Isolation**

- The neighborhoods of east and west Baltimore that are majority Black/African American are disconnected from the region's resources and labor market due to legacy infrastructure decisions prioritizing highways over public transit;
- Historic disinvestment has resulted in population loss, which then further reduces local tax revenue and concentrates poverty, leaving a significant number of neighborhoods in the City of Baltimore with limited economic resources and opportunities. Concentrated poverty creates a vicious cycle of lower educational attainment, underemployment and a lost opportunity for wealth generation for many of Baltimore's Black/African American workers.

## **Digital Connection**

- Digital access by Black/African American residents, as defined by computer ownership and internet subscription, has improved between 2018 and 2022. However, lack of internet access is persistent for Hispanic residents in the City of Baltimore in particular.

Addressing the entrenched and interrelated nature of the barriers summarized above requires a bold commitment to public investment and necessitates coordinated policy actions for repair and integration to create communities in which all residents have an opportunity to thrive.

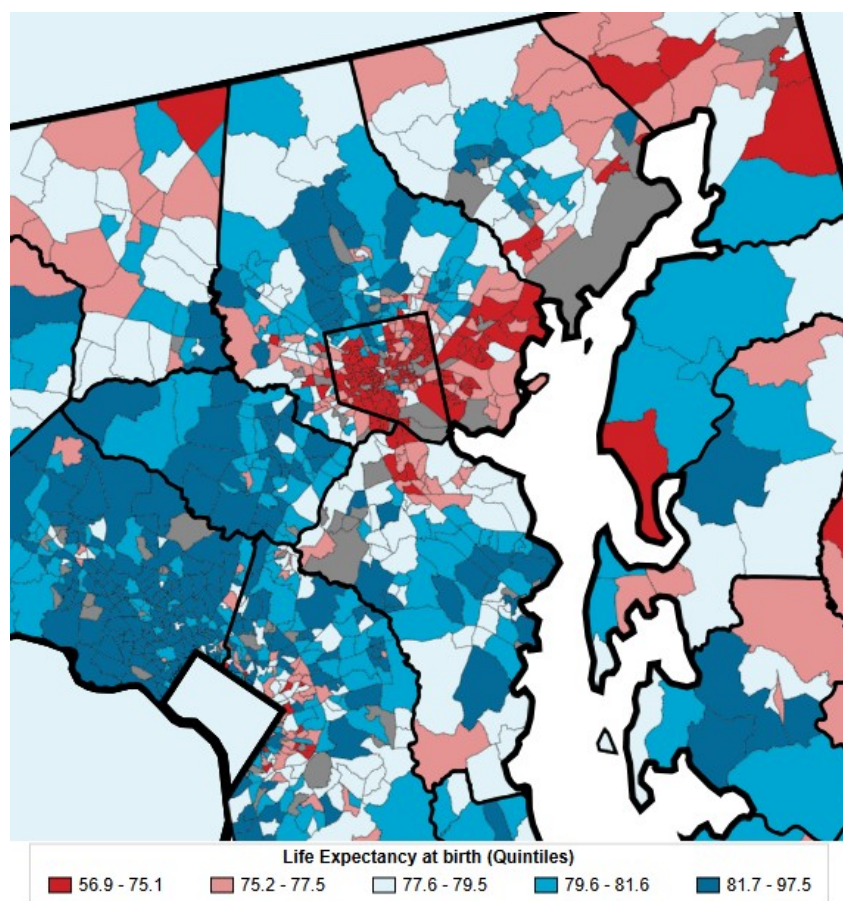
## **Exposure to Environmental Hazards**

Consistent with metropolitan development across the United States, historical redlining, segregation through racial zoning, and chronic disinvestment are a foundation of the Baltimore regional landscape. Minority and higher poverty households can become concentrated in areas fraught with industrial waste and pollution, highways, and neighborhoods lacking trees and greenspace. This geographic disadvantage often correlates with disparities in human health and life outcomes across all 5 jurisdictions.

Looking at life expectancy data from birth as shown in Figure IV-1, census tracts with the lowest life expectancy are clustered in the predominantly Black/African American communities of Baltimore City, southeast Baltimore County (which remains predominantly white), and a few census tracts in Harford, Anne Arundel and Howard. With the exception of southeast Baltimore County, these tend to correlate (as shown below) with environmental hazards that are disproportionate to lower income, predominantly non-White census tracts.

**Figure IV-1.  
Life Expectancy at  
Birth, Baltimore  
Region**

Source: NCHS, National Vital Statistics System, US Small-area Life Expectancy Estimates Project (USALEEP), 2018.



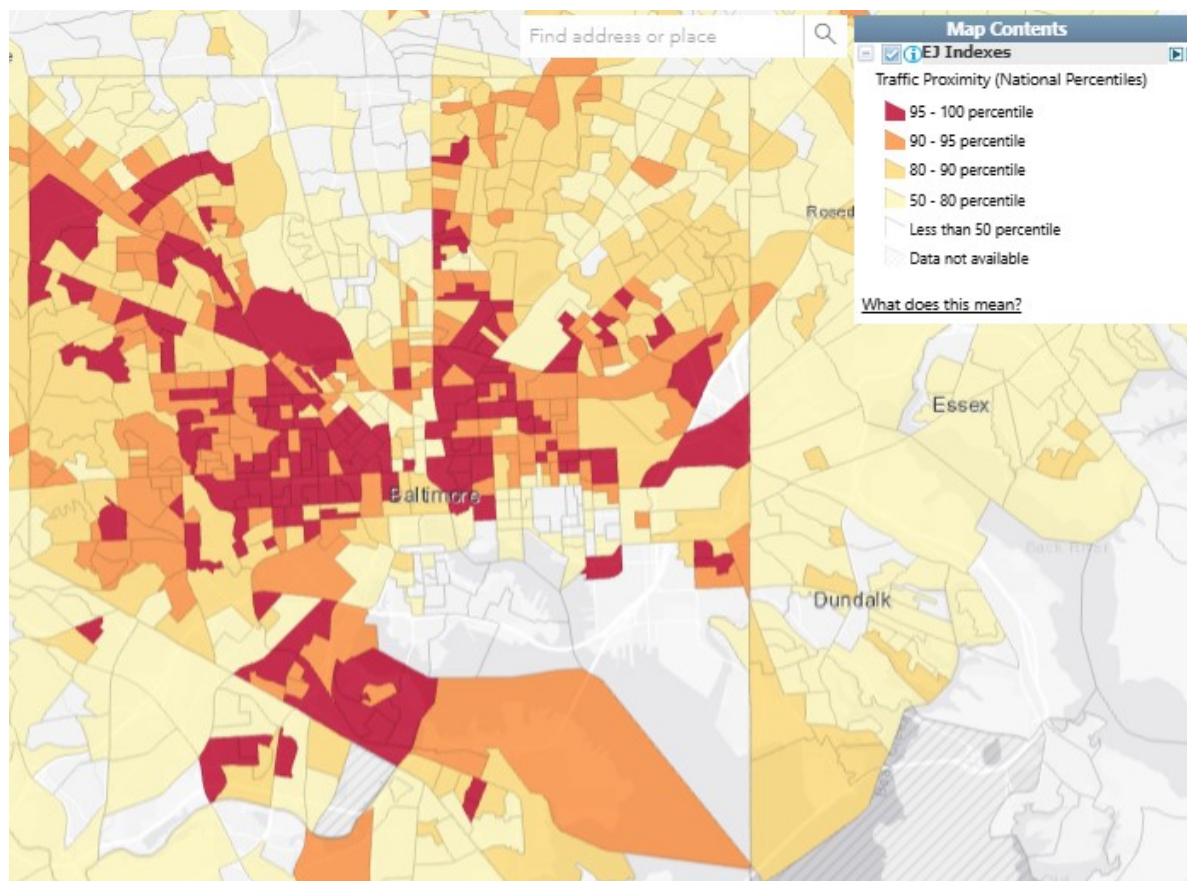
Exposure to air pollution, mold, lead and rodents is correlated with chronic respiratory distress such as asthma and allergies, cancer, as well as behavioral disorders and learning difficulties. A significant amount of housing inventory inhabited by lower income residents in the Baltimore region is aging, lacking adequate repair and maintenance and is in close proximity to industrial areas, and/or traffic congestion. This is prevalent in low-income communities in disinvested Baltimore City neighborhoods as well as in more suburban and rural areas in Harford County, southeast Baltimore County and west Anne Arundel County. These conditions have profound repercussions on health outcomes, both respiratory and neurological, and can be particularly harmful to young children, people with disabilities and elderly exacerbating existing health conditions.

The Environmental Justice Screening and Mapping Tool of the Environmental Protection Agency provides a visualization of environmental inequities at the census tract level on a wide variety of indicators including particulate matter, proximity to hazardous waste and superfund sites, lead paint, and traffic congestion. The tool also creates indices for each indicator with socioeconomic data from the 2018-2022 American Community Survey.



**Air pollution, proximity to hazardous waste and Superfund sites.** The following maps show the census tracts across the Baltimore Region with the highest national percentiles of environmental exposures for select environmental indicators linked with prevalence and severity of asthma and cancer. All counties in the study have census tracts with some level of environmental exposure risk. The census tracts most affected by exposures have higher densities of residents with protected characteristics—with Baltimore City having the greatest exposure.<sup>1</sup>

**Figure IV-2.**  
**Traffic Proximity Index by Census Tract**



Source: Environmental Justice Screening Tool, Environmental Protection Agency.

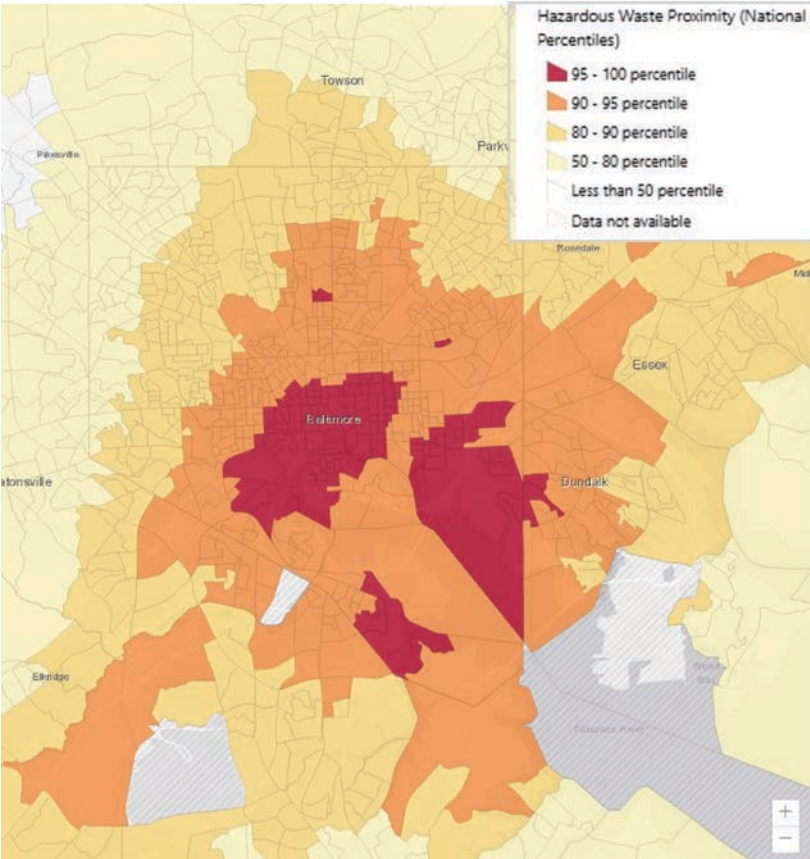
<sup>1</sup> The Traffic Proximity EJ Index combines the environmental burden indicator for traffic proximity with the demographic index (an average of % low-income and % people of color) for each census block group.

The environmental burden indicator for traffic proximity measures the count of vehicles per day (average annual daily traffic- AADT) divided by distance. EJScreen presents traffic proximity using percentile rank, ranging from 0 (lowest) to 100 (highest). *Source:* U.S. Department of Transportation National Transportation Atlas Database,



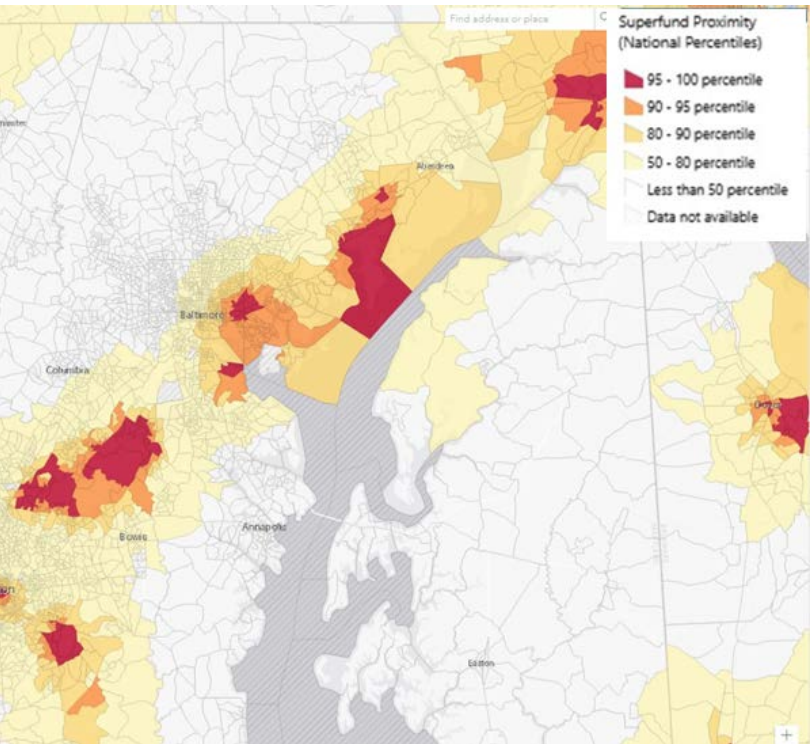
**Figure IV-3.**  
**Hazardous Waste Proximity National Percentiles by Census Tract**

Source: Environmental Justice Screening Tool, Environmental Protection Agency.



**Figure IV-4.**  
**Superfund Site Proximity National Percentile by Census Tract**

Source: Environmental Justice Screening Tool, Environmental Protection Agency.



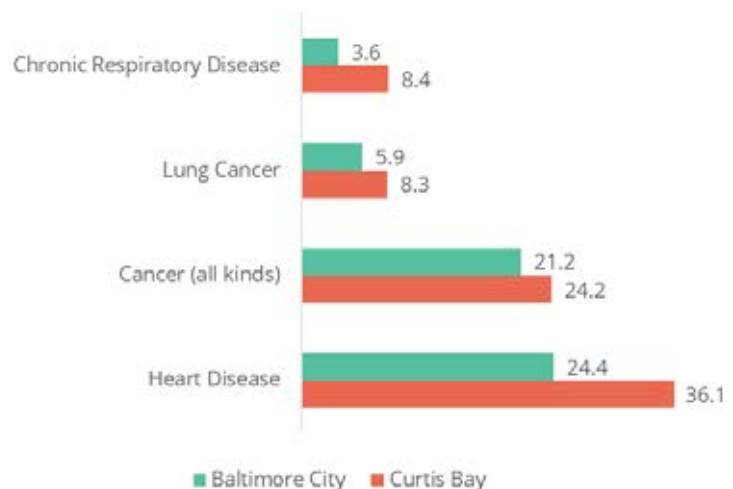
Ongoing cases of disproportionate exposure to toxic environments in Black and Latino communities across the Baltimore region include the following:

- The majority minority communities in southern Baltimore City house a coal plant and the region's largest trash incinerator emanating particulate matter linked to severe respiratory distress and cancer. The BRESCO Wheelabrator incinerator is the City's single largest producer of air pollution; its operations impact predominantly Black/African American communities surrounding its Westport neighborhood location. The City of Baltimore has extended BRESCO's contract until 2031 despite significant resident opposition. Likewise, the CSX coal terminal in the same southwest area of Baltimore City has been under scrutiny for its contribution to pollution particularly following an explosion in 2021 leaving significant coal dust across the community, most evident in the Curtis Bay area. CSX is currently negotiating renewing their contract to continue operating, also with organized resident opposition. They have settled lawsuits with both residents and the Maryland Department of Environment. Figure IV-5 compares health outcomes of Curtis Bay residents as of 2017 to those of Baltimore City as a whole. Baltimore City, in turn, has worse health outcomes than the region.

**Figure IV-5.**  
**Curtis Bay Death Rate**  
**by Cause**

Note: Deaths per 10,000 people.

Source: Neighborhood Health Profile for Brooklyn/Curtis Bay/Hawkins Point Report. Baltimore City Health Department (2017) • Chart: Amisha Kumar.



- The **Sands Road /Lothian** area of Anne Arundel County is home to 33 industrial sites within 5 miles of each other involved in gravel mining and wastewater treatment, 2 of which with known cancer-causing contaminants above allowable health regulations. Lothian is a diverse rural community with roughly 45% identifying as Hispanic or Black /African American. Neighboring Marlboro Meadows in Prince George County is nearly 80% Black and is similarly impacted by industrial activity in the area which is more often in non-compliance with discharge permits than not and has decades old “special exemption” permits. These permits are currently being challenged by Black/African

American community activists. Pollution from these industries includes air and water, dust and noise. .

- **Joppatowne:** In Harford County, Texas based homebuilder D.R. Horton has been cited for repeated violations in the development of an upscale housing development causing mud runoff into the Gun Powder River contaminating the water supply and causing long-term damage in the census tracts surrounding the river in Joppatowne. These census tracts have the highest concentration of Black/African American and Hispanic residents in the county at over 40% compared to less than 10% in the majority of the county's census tracts.
- **Baltimore County Turner Station Superfund Site:** In southeast Baltimore County, Turner Station is a historically Black/African American community established due to employment opportunities at Bethlehem Steel in the late nineteenth century. The decline of manufacturing left behind a community with significant environmental degradation including a brownfield site where the factory once stood and the highly polluted "Bear Creek" designated as a superfund site.<sup>2</sup> Community members and environmental groups are concerned that the proposed EPA clean up, however, could leave the community vulnerable to flooding as a low-lying area with inadequate storm drainage infrastructure demonstrating the compounding issues of legacy disinvestment commonplace for Black communities in the region. Asthma diagnoses in this community were nearly 40% higher than the state average which can be seen in the Centers for Disease Control map below.

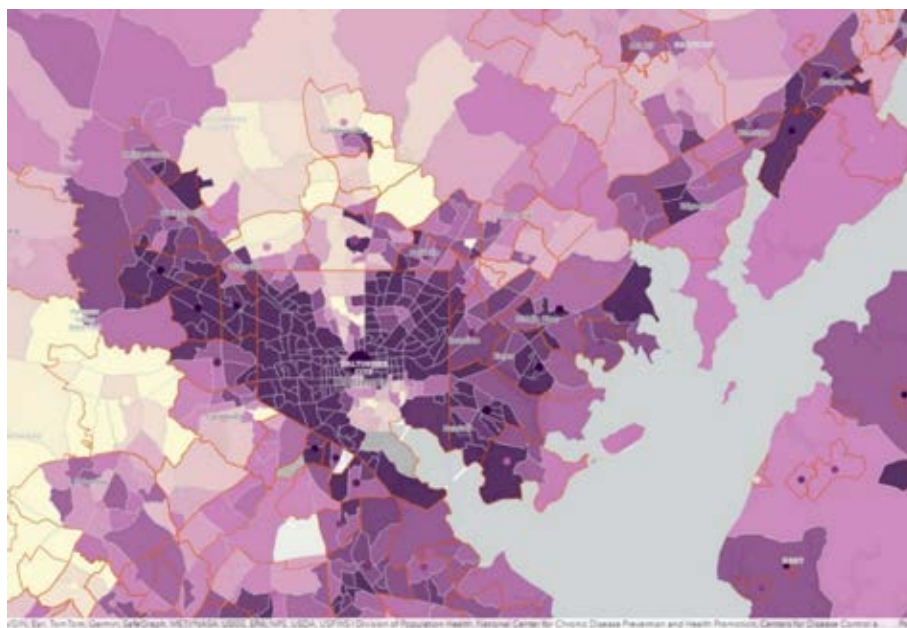
Higher rates of asthma diagnosis shown in east and west expansions from the center of Baltimore City correlate with census tracts that are majority Black and lower income.

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<sup>2</sup> [The Proposed Cleanup of a Baltimore County Superfund Site Stirs Questions and Concerns in a Historical, Disinvested Community - Inside Climate News](#)

**Figure IV-6.  
Asthma  
Diagnosis for  
Adults over  
18 Baltimore  
Region**

Source: Centers for Disease Control from the Behavioral Risk Surveillance System and 2022 American Community Survey 5-year estimates.



**Lead** in paint and pipes is a well-known toxin in homes built prior to 1980. While substantial research has linked lead paint with learning difficulties following prolonged exposure, a growing body of research is also demonstrating a correlation between lead exposure and violent behavior leading to incarceration independent of individual and family attributes.<sup>3</sup>

Figure IV-7 shows the distribution of homes built before 1965 that are at high risk of having lead paint. These high-risk homes are prevalent in Baltimore City's census tracts that are predominantly Black and Latino. Extensive outreach to communities on the risks of lead paint exposure has had an impact regionally: the number of children with elevated lead blood results dropped 97% from 1992 to 2016. A recent report by Abell Foundation estimated just over 85,000 homes in the City of Baltimore are still at high risk for lead toxic exposure predominantly from paint, the abatement of which would cost between \$2.5 and \$4.2 billion.<sup>4</sup> These are homes typically inhabited by lower income residents in units that have not been properly maintained or tested for the presence of lead.

<sup>3</sup> [New evidence that lead exposure increases crime \(brookings.edu\)](https://www.brookings.edu/research/new-evidence-that-lead-exposure-increases-crime/)

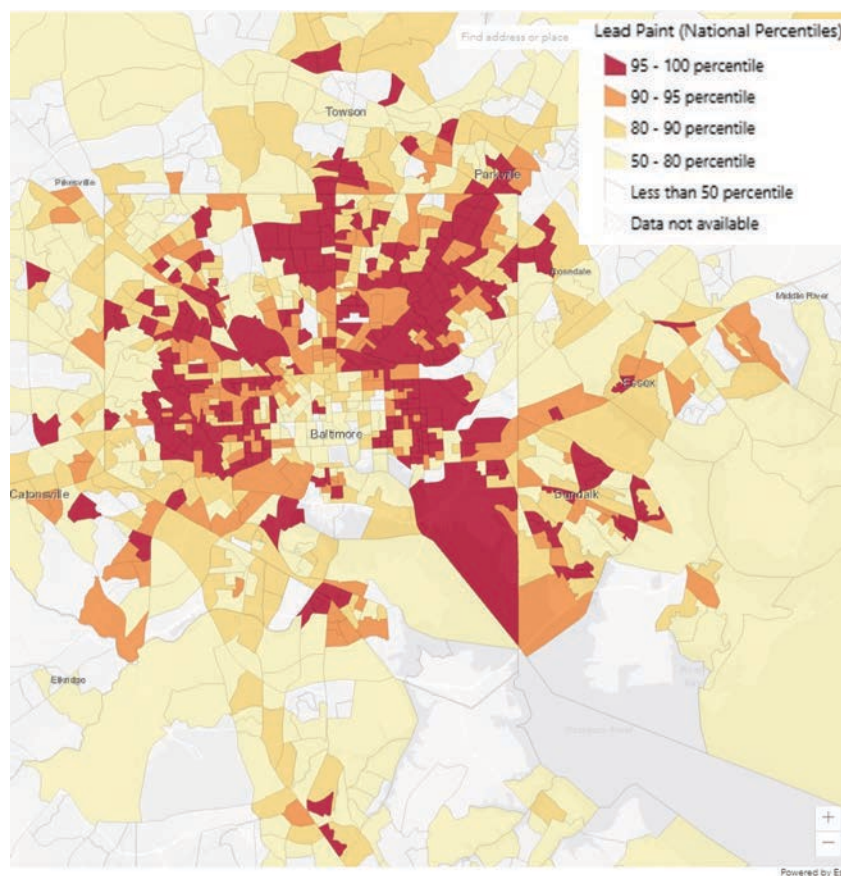
<sup>4</sup> [2022 Abell Lead-Control-report FINAL-web.pdf](https://www.abell.org/research/2022-Abell-Lead-Control-report-FINAL-web.pdf)



**Figure IV-7.  
Homes Built Before  
1965 by Census  
Tract at Risk for  
Lead**

Note: Darkest red indicates higher number of older homes than national average.

Source: Environmental Justice Screening Tool. Accessed 2024.



**Mold** grows rapidly in hot, humid and damp environments and is often associated with faulty/leaking plumbing and inadequate or damaged roofing even in dry climates. Mold, particularly Black Mold, triggers severe allergies and respiratory illness and some studies have more recently even shown a relationship to neurological impairment including memory loss. According to HUD’s 2015 American Housing Survey (AHS) and American Healthy Homes Survey II (AHHS II), mold is most prevalent in pre-1950 homes, but there is also risk of its presence in homes pre-1980.

The state of Maryland currently does not have any laws requiring landlords to disclose the presence of mold to prospective tenants (unlike lead) which places the burden onto the tenant if it is discovered following signing a lease. The State of Maryland does have an “escrow” requirement that allows tenants to pay rent into an escrow account if a reported mold issue is left unaddressed. These funds are then used for inspection and remediation. Mold remediation, however, is expensive and often requires vacating the unit until the process is complete due to the considerable health impacts of exposure. The non-disclosure of mold is a considerable harm to lower income residents who have limited housing choices and do not have the means for alternative living accommodations.

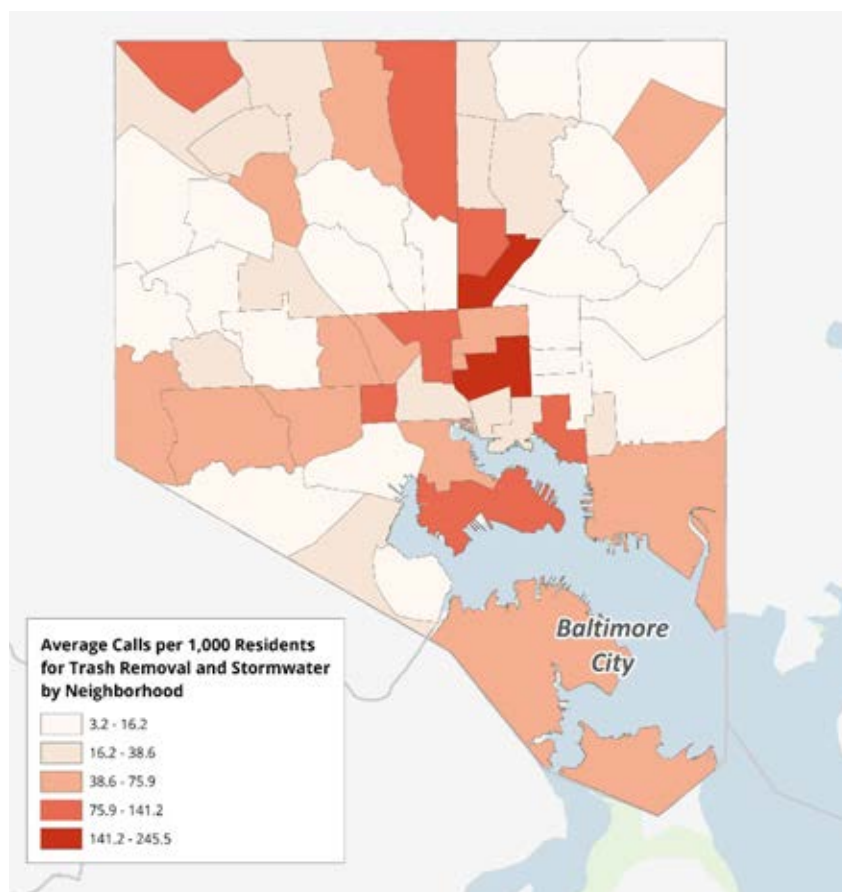
**Rodents** have entry access points due to lack of repair/maintenance and are attracted to accumulation of trash in lower income, majority minority and R/ECAP neighborhoods that are not frequently served by municipal public services. The presence of mice has been

linked to increased occurrence of asthma in children. Rats are well established hosts of a multitude of pathogens having health consequences, but have also been linked with mental health, especially depression, through chronic environmental stress.

Figure IV-8 maps the number of calls per 1,000 residents to report storm drainage blockage and trash removal needed. Darker color indicates a higher average number of calls, and it is somewhat consistent with demographic, health and environment data indicating higher levels of unaddressed need in the most vulnerable neighborhoods. Higher income neighborhoods including Greater Roland Park, Guilford/Homeland, Canton, and Locust Point also have high volumes of calls which is consistent with high levels of homeownership. The lower income neighborhoods of Upton/Druid Heights, Sandtown/Winchester/Harlem Park, Poppleton, Brooklyn/Curtis Bay and Southwest Baltimore report a significant number of calls compared to surrounding areas with Oldtown and Midway/Goldstream neighborhoods having very high number of calls. The Baltimore region is also particularly at risk for climate change related flooding and inadequate storm drainage infrastructure, as it lies mostly below sea level having disproportionate impact on lower income neighborhoods.

**Figure IV-8.**  
**Average Calls per**  
**1,000 Residents for**  
**Trash Pick Up and**  
**Blocked Storm**  
**Drainage**

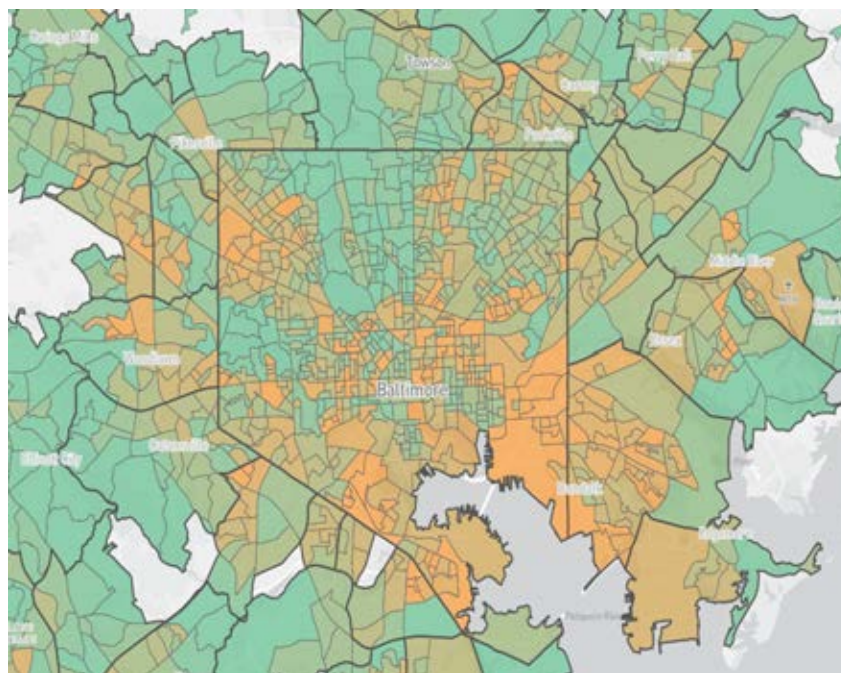
Source: Open Baltimore and  
Neighborhood Indicators Alliance,  
2021 data.



**Tree canopy / greenspace.** The wealthiest neighborhoods in Baltimore have 80% more tree canopy than the city's poorest neighborhoods.<sup>5</sup> Tree equity scores, shown in the following map, are calculated by comparing an area's tree canopy with supplemental data such as surface temperature, population density, income, employment and race. Orange areas are census tracts with tree equity scores below 70 indicating very little tree canopy coverage, roughly less than 20%.

Low tree canopy correlates closely with race and income and historically redlined neighborhoods and lack of housing with air conditioning (or high air conditioning costs). Climate change has exacerbated chronic health conditions prevalent in Baltimore's "heat islands". Additionally, lack of tree canopy and greenspace contributes to storm drainage issues. Conversely, ease of access to greenspace has long been associated with lower stress and mental health benefits.<sup>6</sup>

**Figure IV-9.  
Baltimore Region  
Tree Equity Score**



Source: American Forests, 2024.

The composite physical distress map of all health factors, shown below, illustrates the impact of place on overall physical wellbeing. Census tracts in the deepest purple in Figure IV-10 report higher incidence of physical distress aligning with higher populations of Black

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<sup>5</sup> [Finding 'Tree Equity:' New Analysis Shows Neighborhoods That Need More Trees - Maryland Matters](#)

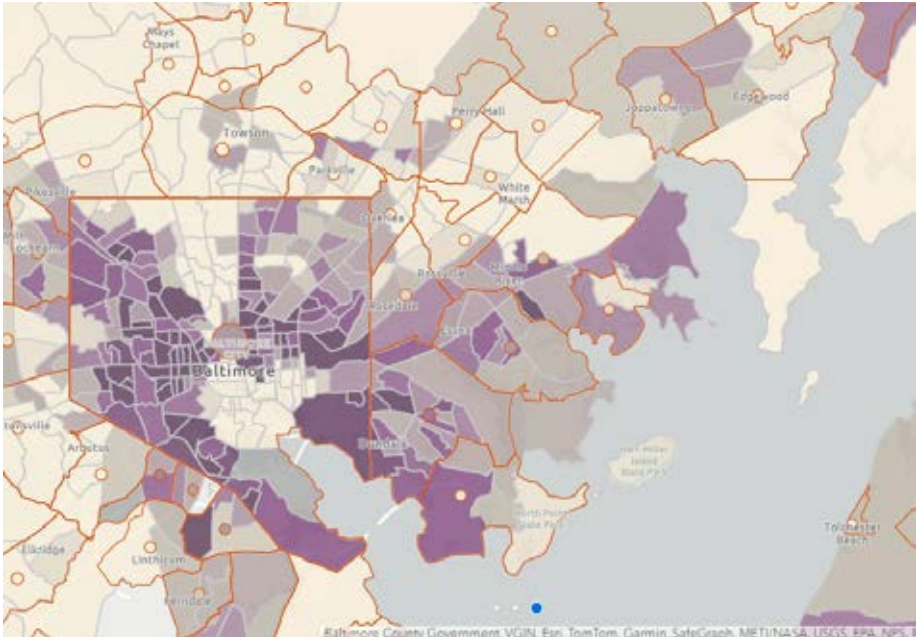
<sup>6</sup> [Neighborhood segregation, tree cover and firearm violence in 6 U.S. cities, 2015–2020 - PMC \(nih.gov\)](#)



and Latino households and communities disproportionately impacted by environmental hazards. Figure IV-11 shows the same patterns for frequent mental distress.

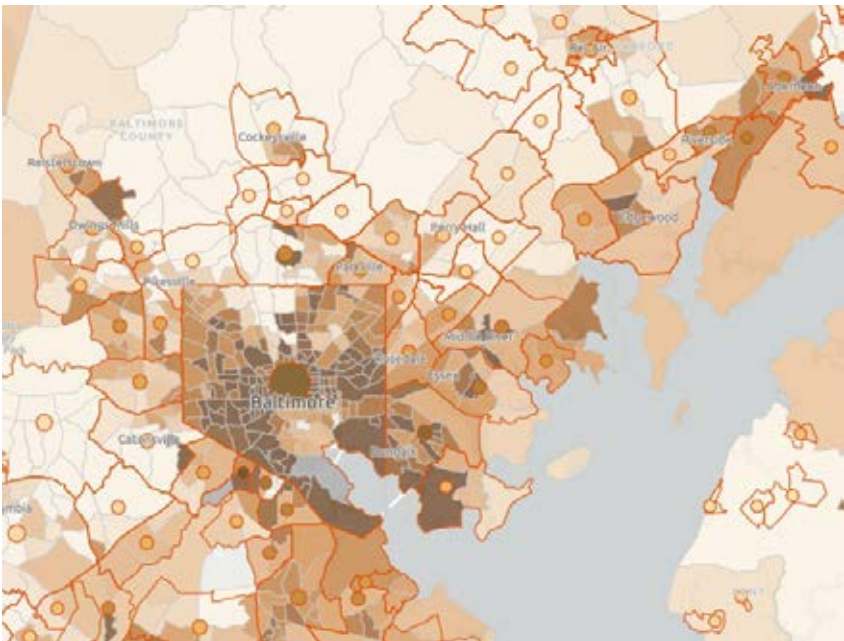
**Figure IV-10.**  
**Frequent Physical**  
**Distress Baltimore**  
**Region**

Source: PLACES from the Centers for Disease Control using the Behavioral Risk Surveillance System and 2022 American Community Survey 5-year estimates.



**Figure IV-11.**  
**Frequent Mental**  
**Distress in**  
**Baltimore Region**

Source: Centers for Disease Control from the Behavioral Risk Surveillance System 2022/2021 and American Community Survey 2022 5-year estimates.



**Neighborhood social environment.** Gun violence is a major risk factor for people in lower income urban neighborhoods—but also often occurs unexpectedly in smaller communities and suburbs. Exposure to violent crime in general, however, has higher incidence rates in inner city neighborhoods and its prevalence and severity is the culmination of inequitable built and social environments. This is demonstrated in Figure IV-12.

The link between trauma and stress with mental and physical health is well researched and has demonstrated that children living in high crime neighborhoods are at high risk for not only personal injury or death related to violent crime, but negative health outcomes from repeated and prolonged exposure. Neuropsychologists have found that traumatic experiences can alter children’s brains through activating “flight, fight, or freeze” responses while dialing down the learning and language areas of the brain. Over time for children under 5, the brain is fundamentally changed for survival.

Neighborhood environments that are mixed income and have higher levels of social cohesion as defined by the presence of nonprofit/community organizations, civic participation accessibility, neighborhood associations, and faith communities not only contribute to crime prevention, but also create social connections requisite to mitigating the impacts of violence and stress related trauma. High levels of neighborhood “collective efficacy”, or ability to advocate on behalf of the community and civic engagement are associated with improved resources and community stability.

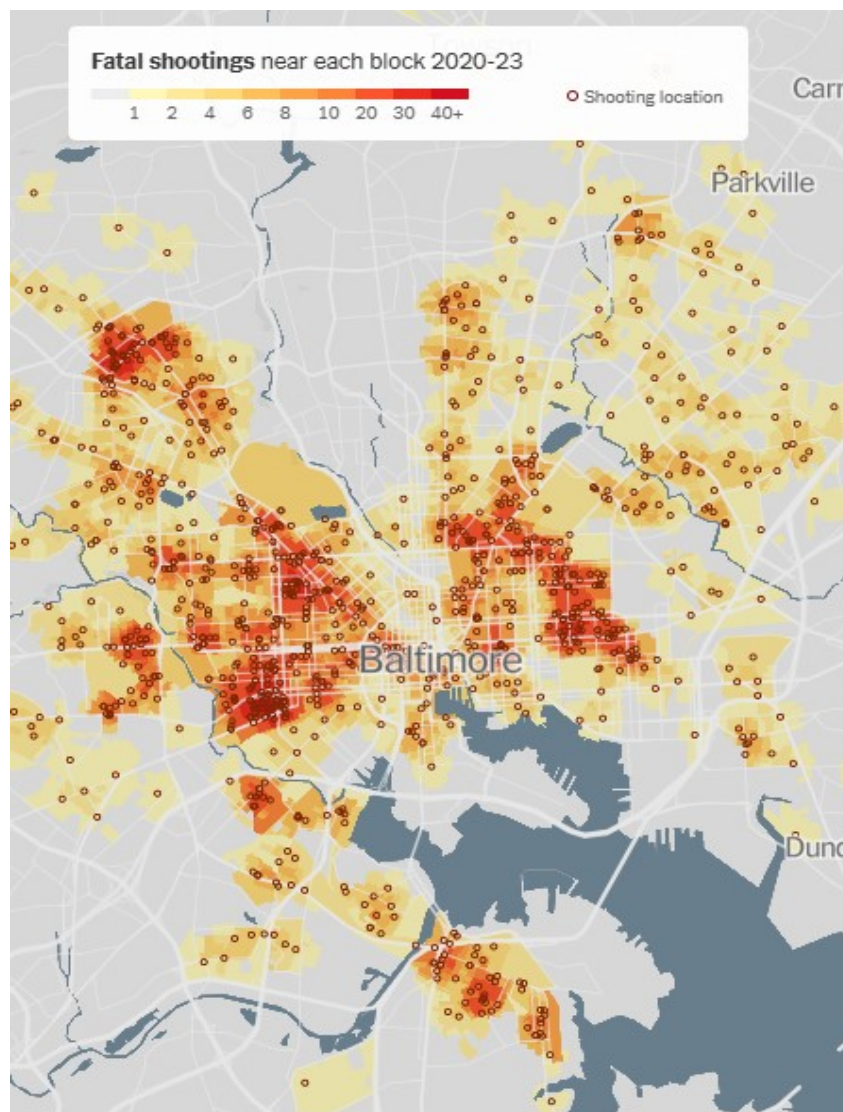
An example of these differences is found in a comparison of two neighborhoods in Baltimore City. According to the Justice Policy Initiative, residents in southwest Baltimore are 8 times more likely to be incarcerated than residents living in Midtown.<sup>7</sup>

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<sup>7</sup> [The Right Investment 2.0: How Maryland Can Create Safe and Healthy Communities - Justice Policy Institute Community](#)

**Figure IV-12.  
Baltimore Fatal  
Shootings**

Source: New York Times with data from the Gun Violence Archive, 2020-2023.



**Food access.** The USDA Food Access Research Atlas measures “food deserts” based on proximity to healthy food by foot and car. Figure IV-13 shows that map for the Baltimore region. Areas that are low income and more than 1 mile by foot and 10 miles by car are indicated in green and areas that are low income and ½ mile by foot and 10 miles by car are indicated in orange.

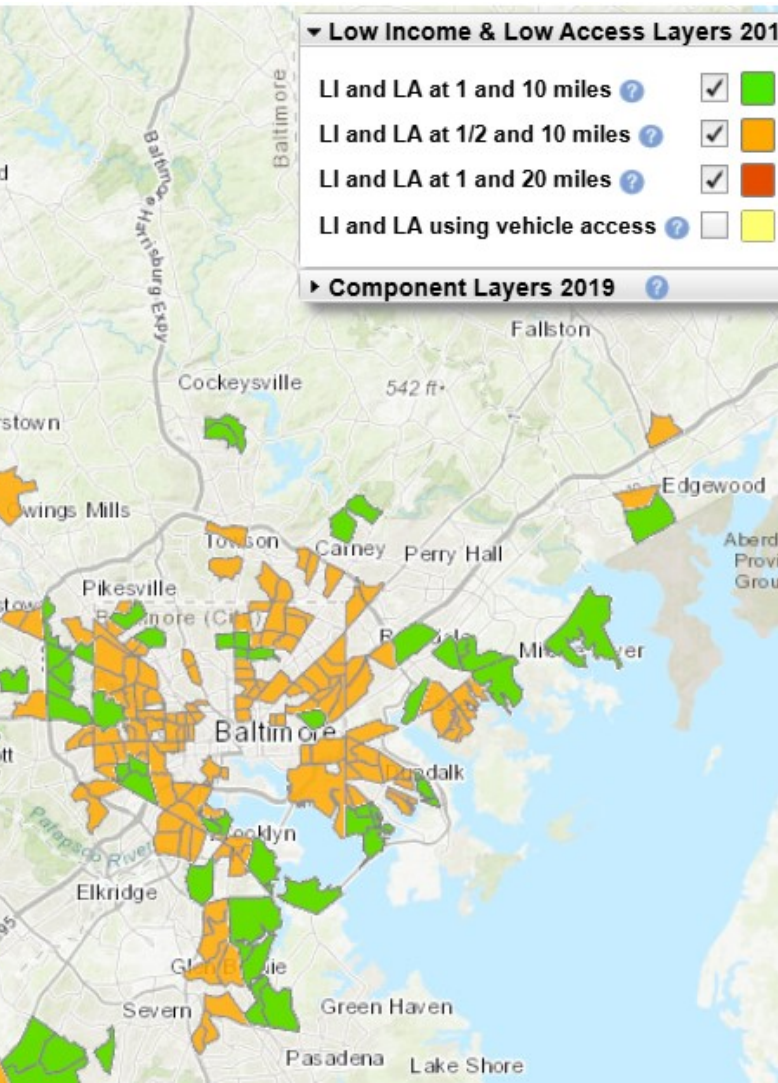
Of greatest concern are green areas indicating that in these communities, residents are lower income and 1 mile from a full service grocery store, which means they are often relying on corner markets, convenience stores and gas stations for food which has been studied extensively as deleterious to health outcomes as these establishments typically carry little to no fresh produce and high volumes of low cost highly processed foods. Lower income residents might typically be required to use public transit to full service supermarkets complicating access to fresh food. Residents who have access to a car often



cannot afford gas to drive long distances to access fresh food locations that will accept SNAP payment and are therefore also at risk for negative health outcomes from living in a food desert.

**Figure IV-13.**  
**Baltimore Region**  
**USDA Food Desert**  
**Map**

Source:  
USDA Food Access Research Atlas  
2019 (most recent data)



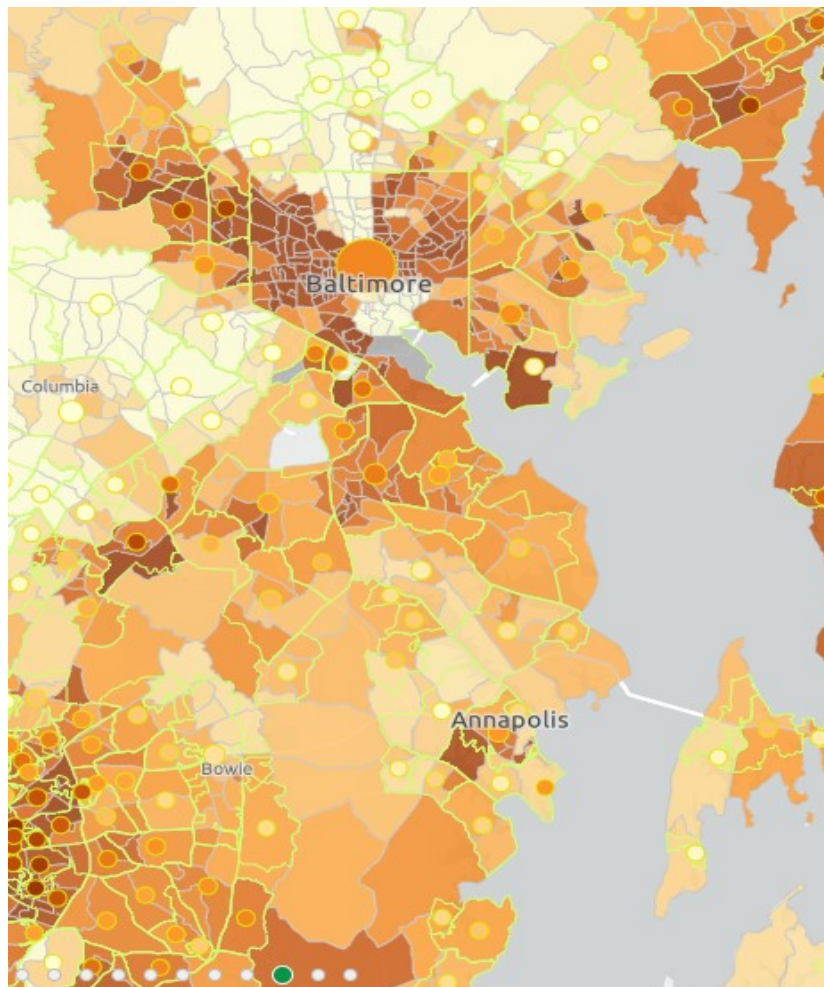
**Health outcomes** of nutritionally insufficient diets that are low in whole foods and high in processed items typically provided at a corner market include higher rates of obesity, diabetes and heart disease, exacerbating unhealthy exposure to environmental toxins. One in four Baltimore residents live in a food desert in the City of Baltimore and these areas highly correlate with higher concentrations of African American residents according to a study by Johns Hopkins University.<sup>8</sup>

<sup>8</sup> [Mapping Baltimore City's Food Environment - - Johns Hopkins Center for a Livable Future \(jhsph.edu\)](https://www.jhsph.edu/research/centers-and-programs/center-for-livable-future/mapping-baltimore-citys-food-environment)

The following maps show rates of obesity, high blood pressure, diabetes, and heart disease.

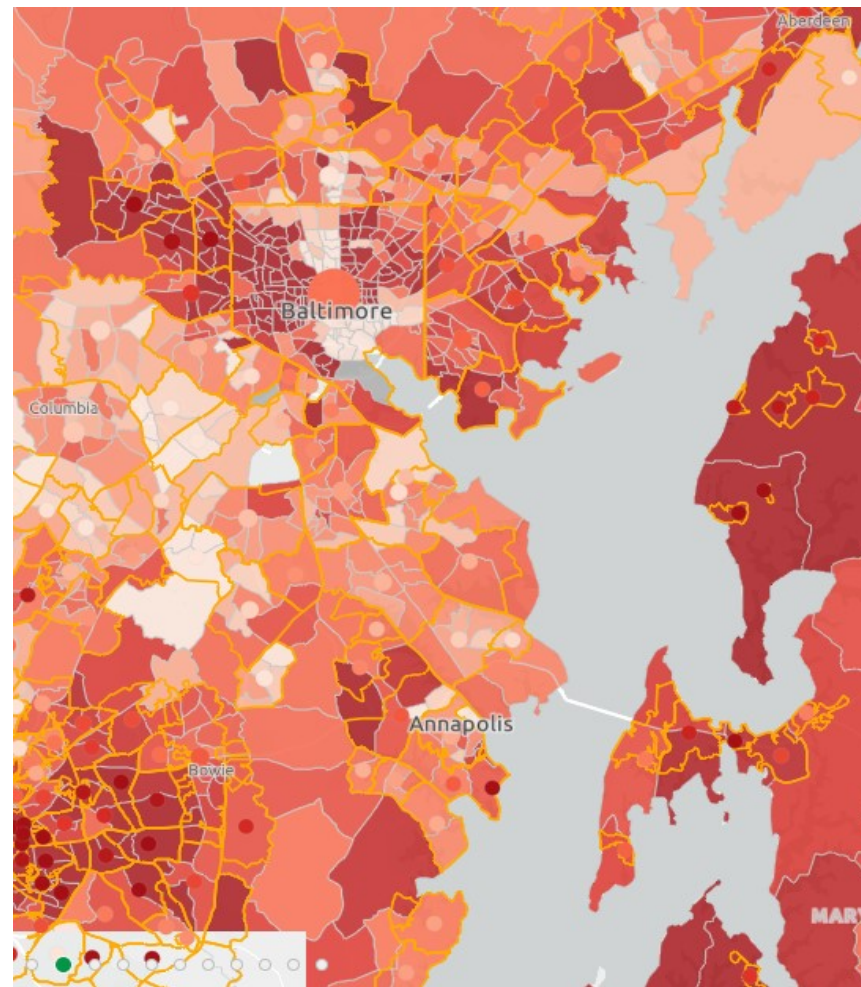
- In Baltimore City, rates of obesity largely align with concentrations of African American residents and areas of high poverty. High obesity areas also extend into parts of Baltimore County. Obesity is also prevalent in many parts of Harford County. Dependency on automobiles and limited walkability in these areas may contribute to higher obesity rates.
- High blood pressure is common in east and west Baltimore City, Baltimore County, and Harford County. High blood pressure is more widespread in the region than the other health conditions.
- High rates of diabetes concentrate in east and west Baltimore City and parts of Baltimore County, but also in many parts of Anne Arundel County.
- Heart disease is less concentrated in Baltimore City than in Baltimore County and Anne Arundel County.

**Figure IV-14.**  
**Baltimore Region Obesity**



Note: Darkest orange indicates prevalence greater than 42.2%, national average is 36.4%.  
Source: PLACES data of the Centers for Disease Control. 2022.

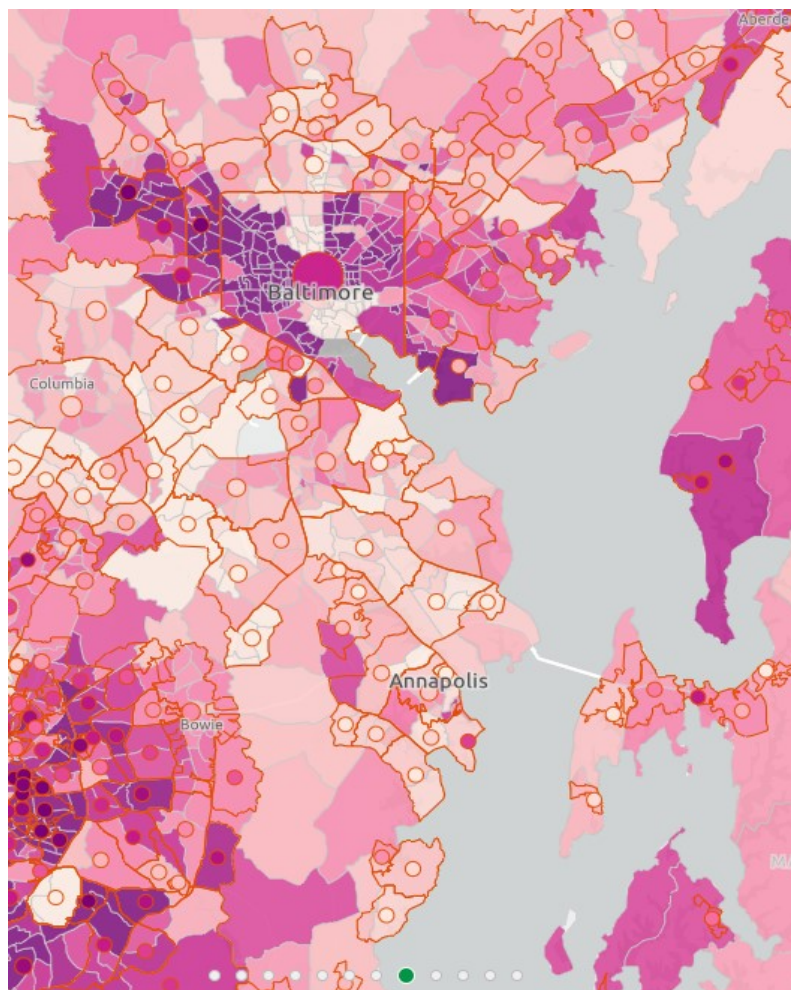
**Figure IV-15.**  
**Baltimore Region High Blood Pressure**



Note: Darkest red indicates prevalence greater than 43%, national average is 36.4%.  
Source: PLACES data of the Centers for Disease Control. 2022.

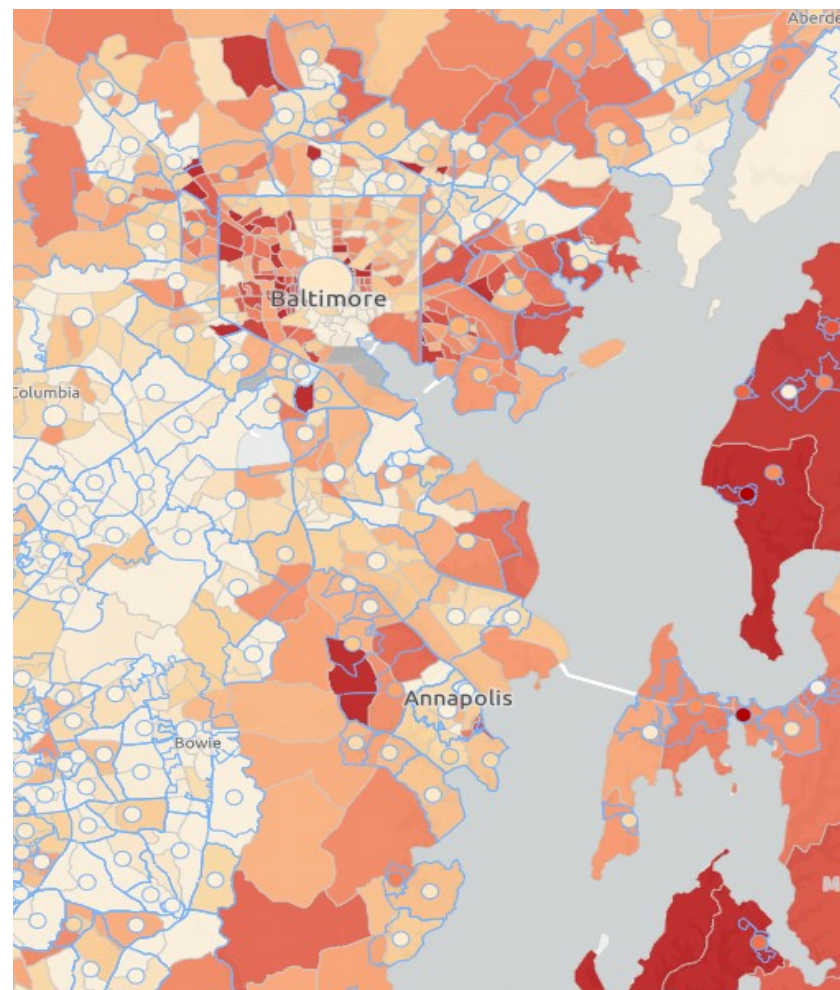


**Figure IV-16.**  
**Baltimore Region Diabetes**



Note: Darkest pink indicates prevalence greater than 16.5%, national average is 13%.  
Source: PLACES data of the Centers for Disease Control. 2022.

**Figure IV-17.**  
**Baltimore Region Heart Disease**



Note: Darkest red indicates prevalence greater than 10.2%, national average is 8%.  
Source: PLACES data of the Centers for Disease Control. 2022..



## Access to Quality Education

**School finance.** The district structure of school funding in the United States creates schools that closely reflect the composition of the neighborhood in which they reside. Neighborhoods and housing developments that are highly segregated by income and race therefore host schools that mirror these patterns. For this reason, school finance models that compensate for neighborhood and student advantage, while imperfect, are critical to mitigating differences in resource allocation. Yet many school finance allocations fail to fully meet the needs of students with compounding challenges and require additional support to approach equitable academic outcomes with students who do not have these obstacles.

The current process for school funding in Maryland was passed by the Maryland General Assembly in 2021<sup>9</sup> and infuses funding into Maryland schools to address inequities in resources for students with protected characteristics. The Blueprint is built upon 5 pillars with the goal of transforming Maryland’s education system, including expanding access to quality Pre-Kindergarten programs; a reconfiguration of teacher compensation including raising the starting pay to \$60,000 annually; and improved student wraparound services through the creation of “Coordinated Community Supports” with specific focus on students with special needs and English language learners.<sup>10</sup> The Blueprint will also address a new formula for addressing student poverty in the school funding calculation. Currently, districts receive a “concentration of poverty” grant based on student/school poverty population to administer needed support. Additionally, Baltimore City Schools has recently increased funding and supports particularly for high-dosage tutoring in math, literacy coaches, extended learning and increased social workers in the highest need schools to address learning outcome differences in higher poverty schools.

A 2023 proposal—in Maryland HB1211—would have changed to a school funding model that includes compensatory per pupil spending *based on each student’s unique address* to incorporate neighborhood exposure into a calculation that typically accounts only for family poverty. The bill did not receive a committee vote; however, the bill introduced a robust model for considering the impact of a student’s living environment on school outcomes that could be reintroduced in the future. As demonstrated in this section, there is a significant need for compensatory funding for students in highly distressed communities, particularly in Baltimore City.

The table below shows the differences in spending per pupil adequacy in the Baltimore region in 2021 based on data from the School Finance Indicators Database. According to

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<sup>9</sup> Blueprint for Maryland’s Future.

<sup>10</sup> [About Us - Blueprint \(marylandpublicschools.org\)](https://www.marylandpublicschools.org/about-us/blueprint)

the data, Baltimore City Schools with higher concentrations of lower income students would need significantly more funding to approach national average test scores while funding in the more suburban areas is more than adequate. The City requires an annual investment of \$36,358 per student to reach outcomes equitable to surrounding counties. Average spending per pupil is \$17,434—which is higher than all other districts, but still inadequate to close education gaps.<sup>11</sup>

**Figure IV-18.**  
**Spending**  
**Per Student**  
**Adequacy**  
**by District**

Source:  
Schoolfinancedata.org,  
2021.

	District Spending Adequacy Profile			
	Actual	Adequate	\$ Difference	% Difference
Anne Arundel County	\$15,429	\$11,053	\$4,376	40%
Baltimore City	\$17,434	\$36,358	-\$18,924	-52%
Baltimore County	\$15,624	\$16,463	-\$839	-5%
Harford County	\$14,545	\$11,069	\$3,476	31%
Howard County	\$16,710	\$10,726	\$5,984	56%

Considering district level poverty, a comparison of Maryland school finance to other states indicates an insufficient compensation for student poverty concentration in schools—and, as demonstrated in this section, has a disproportionate impact on students with protected class characteristics, in this case, race. Differences in adequacy of spending per pupil between districts manifests in overall inequitable opportunity for Baltimore City Schools students to achieve academic outcomes that are equivalent to students in neighboring districts/ counties. According to this data, Maryland ranks 38<sup>th</sup> of 48 states measured for the highest equal opportunity gap defined as adequate spending to achieve an average national proficiency goal.

**Adequate Public Facilities Ordinances (APFO).** Exacerbating disparities in adequate student funding are local Adequate Public Facilities Ordinances (APFO) allowing local governments to deny housing developments (for a number of years) that fall within boundaries of overcapacity schools, the level of which is determined locally and ranges from 100% to 115% depending on the district and school type (elementary, middle, high). APFO can lock lower-income families out of accessing schools with better resources and therefore academic ratings located.

<sup>11</sup> The School Finance Indicators Database collects spending adequacy data for over 12,000 K-12 public school districts, visualizing gaps in spending that prevent equitable academic outcomes and fairness in school finance systems.<sup>11</sup> Adequacy of funding is defined as how much funding would be needed to achieve a common “benchmark” goal—in this case, national average test scores. Cost estimates are from the National Education Cost Model. Additional methodological detail including cost estimates can be found at [schoolfinancedata.org](http://schoolfinancedata.org).

Recent policies are making some high quality schools harder to access, by narrowing the definition of “overcapacity.” For example, Baltimore County recently passed a phased-in reduction of school capacity levels from 115% down to 105% by 2028. The County recently approved an amendment to consider affordable housing developments individually in order to meet its federal requirement of creating 1,000 affordable housing units by 2027.<sup>12</sup>

While school boundary changes that intentionally consider desegregation in coordination with APFO and land use planning decisions would provide the Baltimore region families with better access to higher resourced schools, they are politically volatile and traditionally influenced most by more affluent and connected residents. However, finding a way to keep these ordinances from restricting the growth of needed housing, including affordable housing, would help moderate housing costs overall and facilitate more equitable access to schools in communities of choice.

**Housing-created barriers to access.** School boundaries as set by school districts are notoriously difficult to change and often reflect residential segregation patterns by both income and race. The lack of coordinated planning approaches that consider land use planning and school district boundaries simultaneously with intentional efforts at desegregation can reinforce disparities in educational opportunity not just within districts, but often across districts. Baltimore City Schools has open school choice enrollment for middle and high school students, although other challenges to accessing high performing schools remain.

The maps below illustrate how school boundaries reflect neighborhood demographic compositions contributing to schools that are highly segregated by race and income. Schools that have higher concentrations of lower income students have fewer resources and insufficient support relative to the higher need of students who are economically disadvantaged which results in lower overall school ratings.

The maps below show the percentage of people of color by census tract (darker grey indicates higher percentage), median rent by census tract, median home value by census tract and opportunity quintiles with elementary school boundaries indicated in black outline, and school locations and ratings as follows: Green=5 (highest rating), blue=4, orange=3, yellow=2, and red=1.

School ratings are calculated by the Maryland State Department of Education and comprise the following elements:

- **Academic Achievement (20 points):** Percent proficiency and average level of achievement in math and English Language Arts standardized tests.

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<sup>12</sup> <https://www.baltimorecountymd.gov/departments/housing/fair-housing/hud-conciliation>

- **Academic Progress (35 points):** Percent proficient in science and social studies + student growth in math and English + credit for well-rounded curriculum.
- **Progress in Achieving English Language Proficiency (10 points):** English language learners making progress towards proficiency.
- **Student Quality and Student Success (35 points):** Percent chronically absent, student and teacher surveys and access to well-rounded curriculum.
- Ratings are then determined based upon the school's score out of 100, for example: below 20 would have a rating of 1, above 80 would have a rating of 5.

Schools considered at capacity as determined by their school district are outlined in black and their districts, in dark pink. Capacity levels are as follows based on the most recent information available at the time of this report:

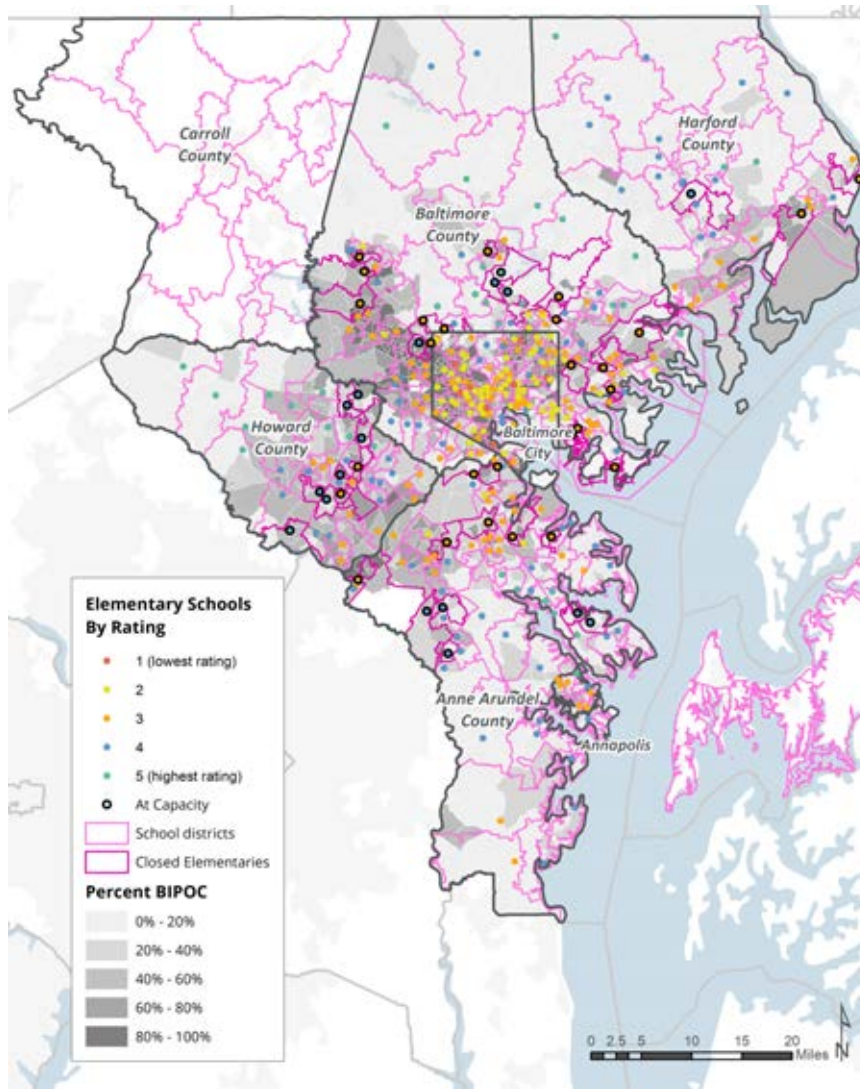
- Baltimore City: NA
- Baltimore County: Currently 115%, progressing to 105% by 2028
- Anne Arundel: 100%
- Howard: 105%, elementary, 110% middle, 115% high
- Harford: 105%

Collectively, the maps demonstrate that:

- Schools that are closed due to capacity have moderate to high quality rankings and are located in moderate to high opportunity areas, characterized by desirable suburban communities. In Baltimore City, the highest performing schools are not closed—but are located in area where rent and home values are the highest.
- Families could, in theory, “rent into” higher performing schools if they can afford the prevailing rent in the district and rental units are available. Median rents in districts with the highest performing schools are in the \$1,700 to \$2,500 range. To ensure that families have the opportunity to “rent into” quality schools, development should be allowed to keep up with demand—but closed schools prevent that.
- “Buying in” is much more challenging for all but high income families: the median valued home in districts with high performing schools ranges from \$600,000 to more than \$1 million.

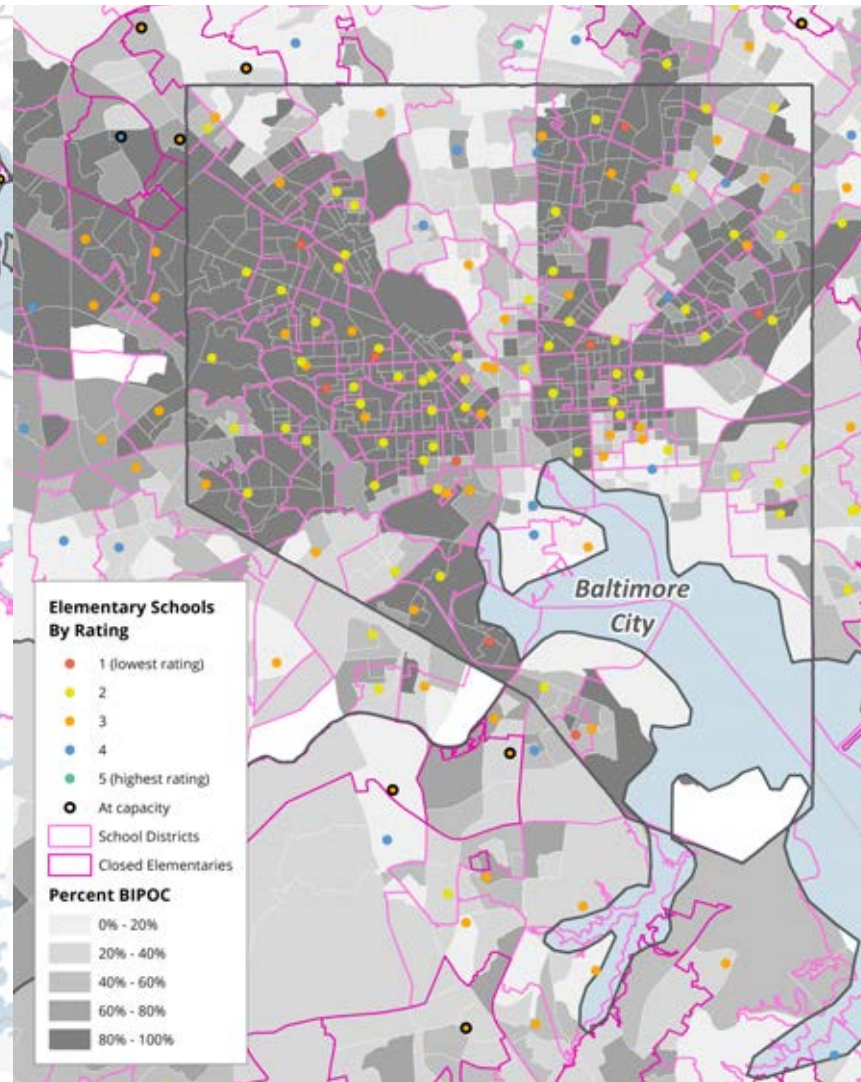


**Figure IV-20.**  
Regional Elementary Schools by People of Color



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

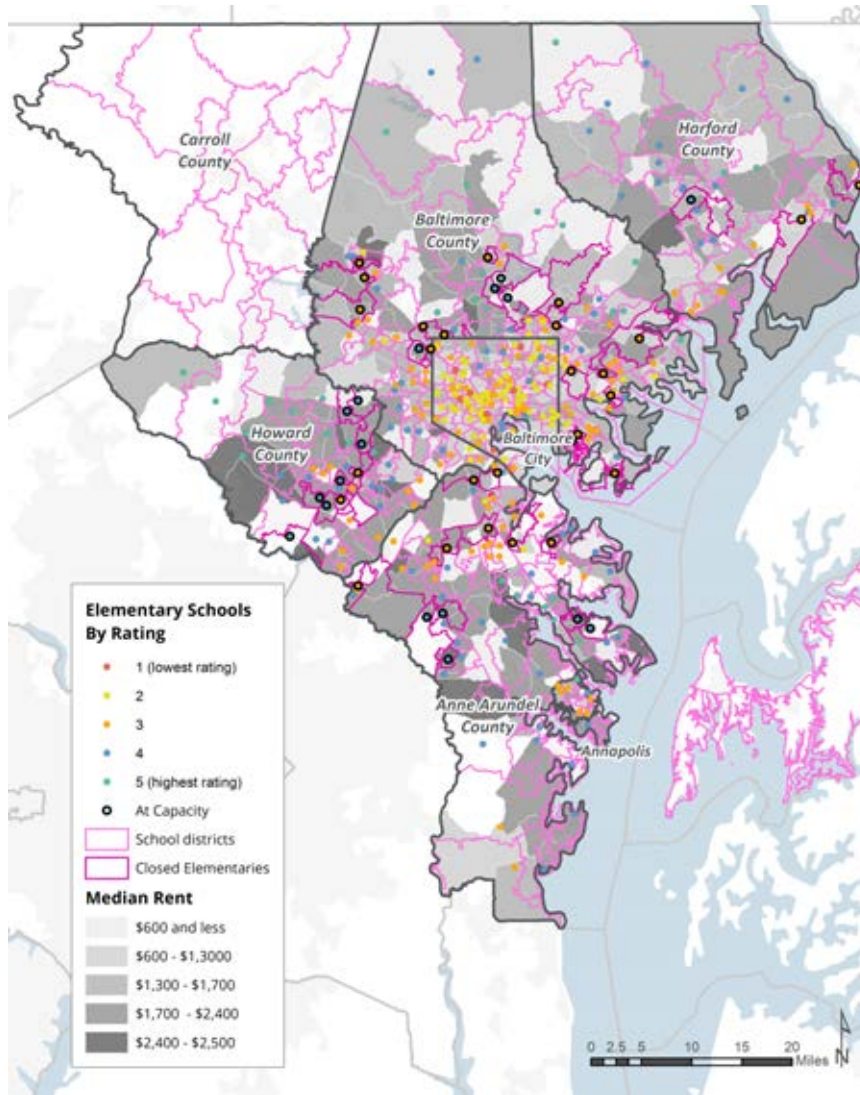
**Figure IV-21.**  
Baltimore City Elementary Schools by People of Color



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

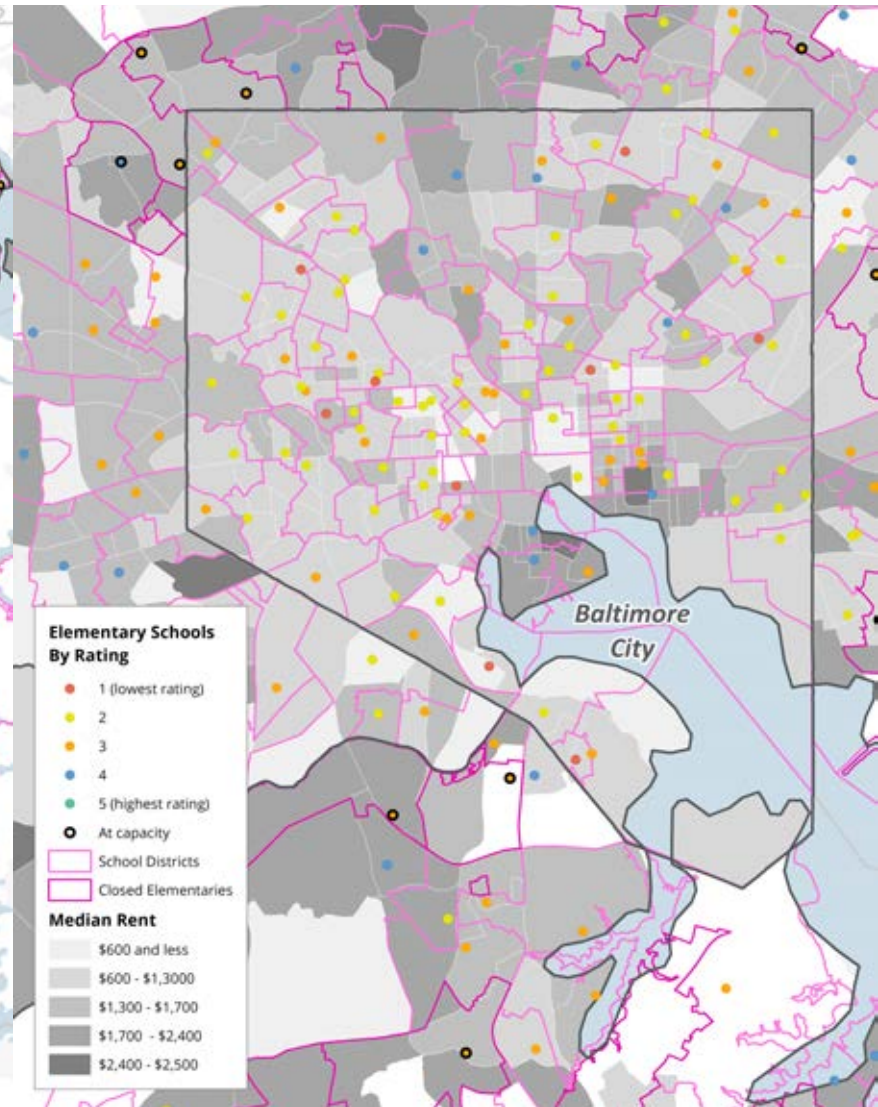


**Figure IV-22.**  
Regional Elementary Schools by Median Rent



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

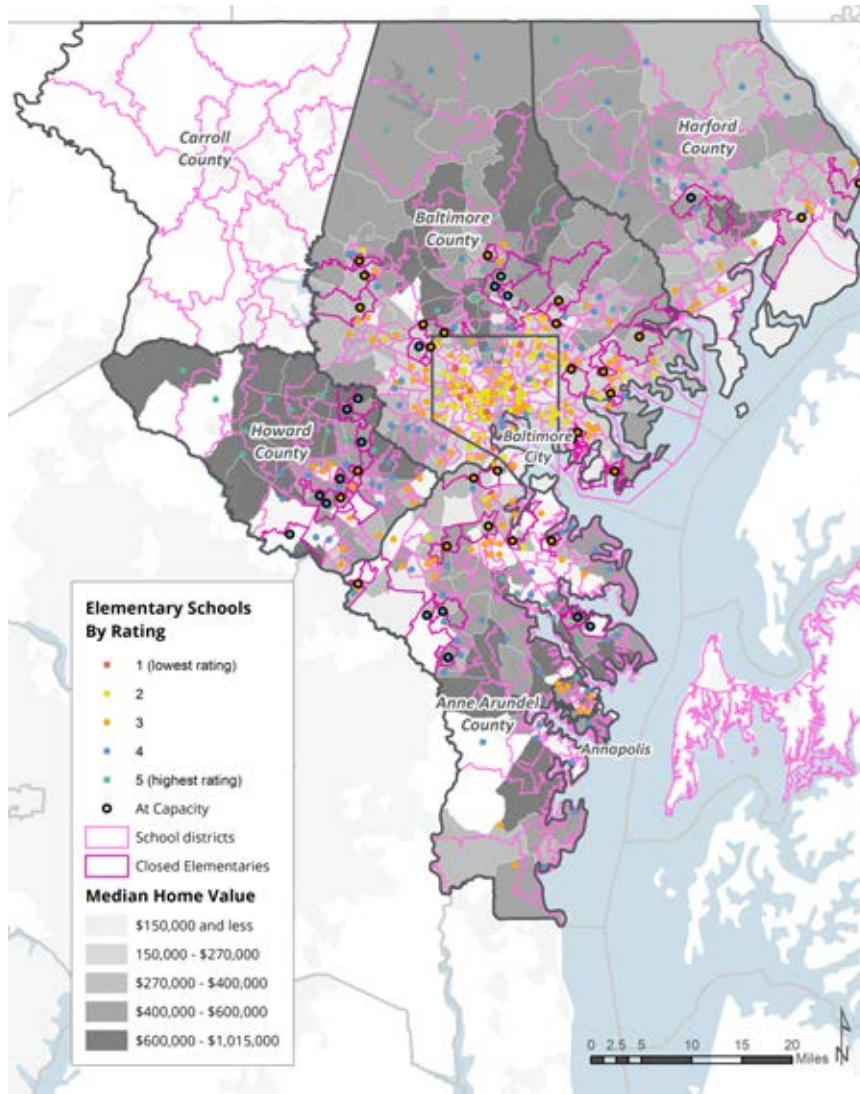
**Figure IV-23.**  
Baltimore City Elementary Schools by Median Rent



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

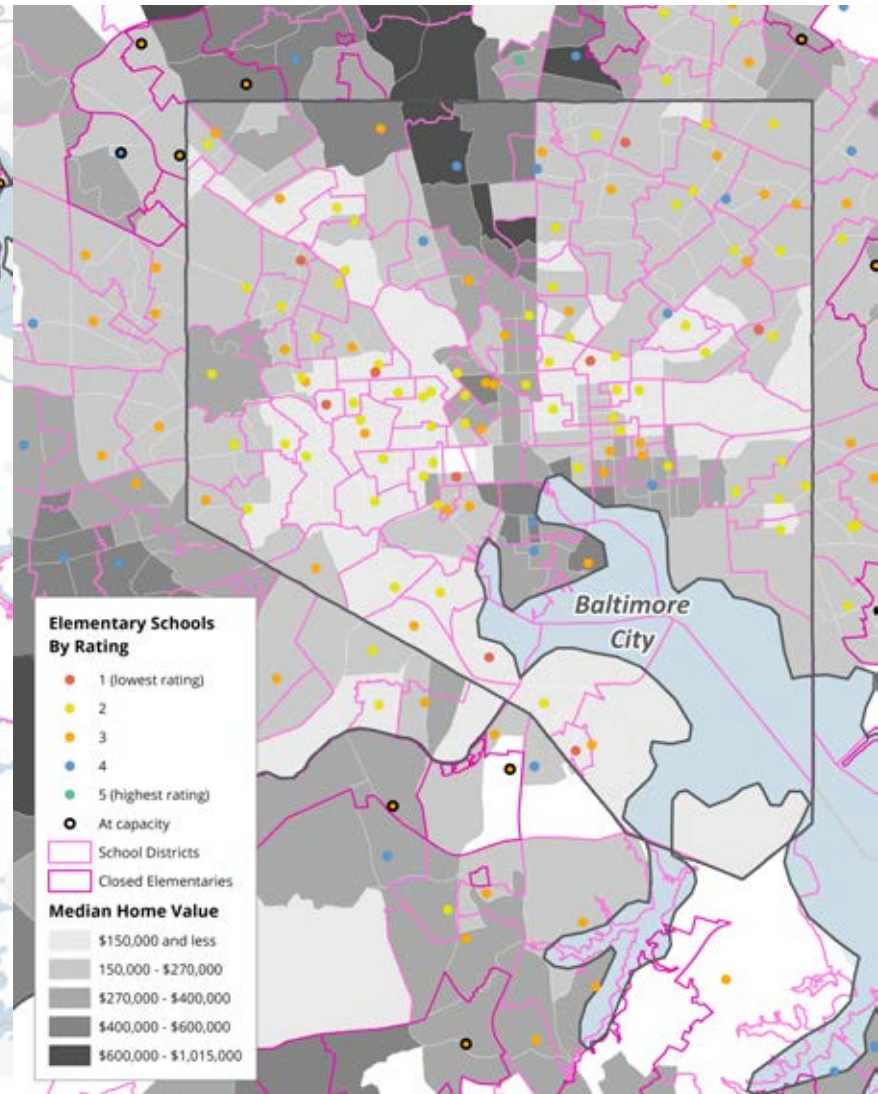


**Figure IV-24.**  
Regional Elementary Schools by Median Home Value



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

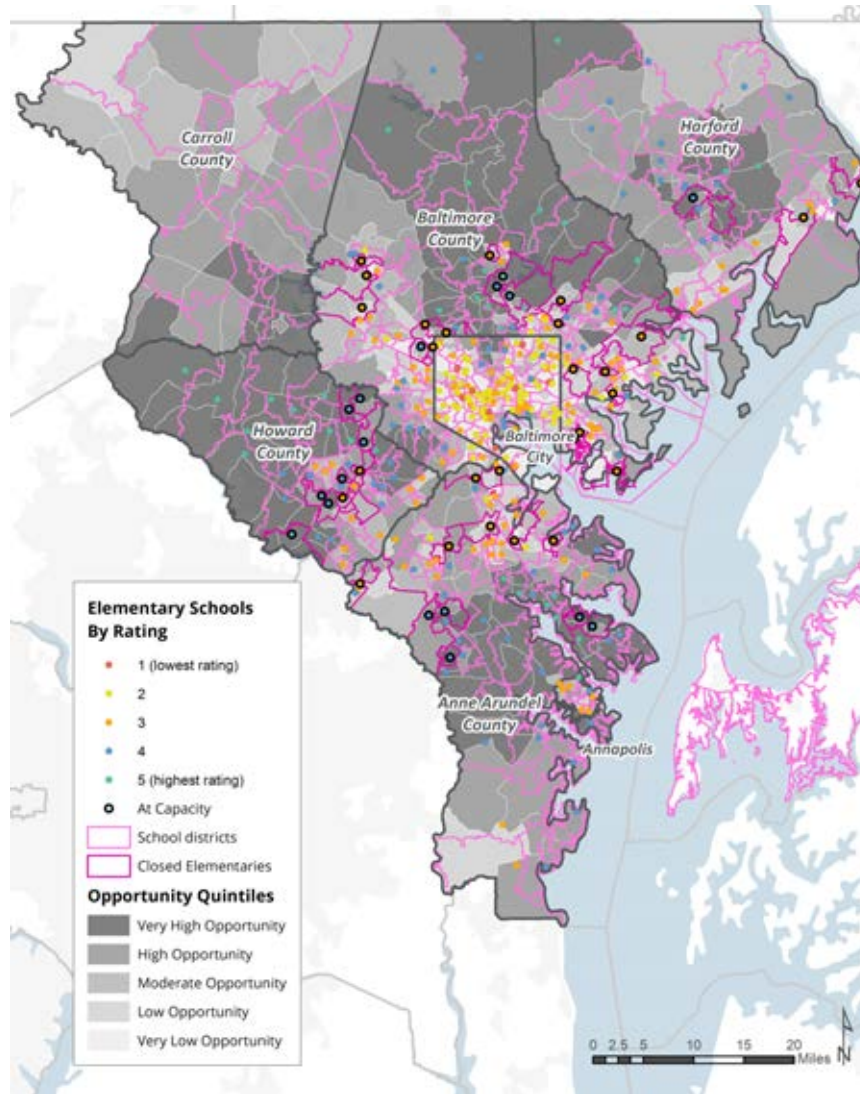
**Figure IV-25.**  
Baltimore City Elementary Schools by Median Home Value



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

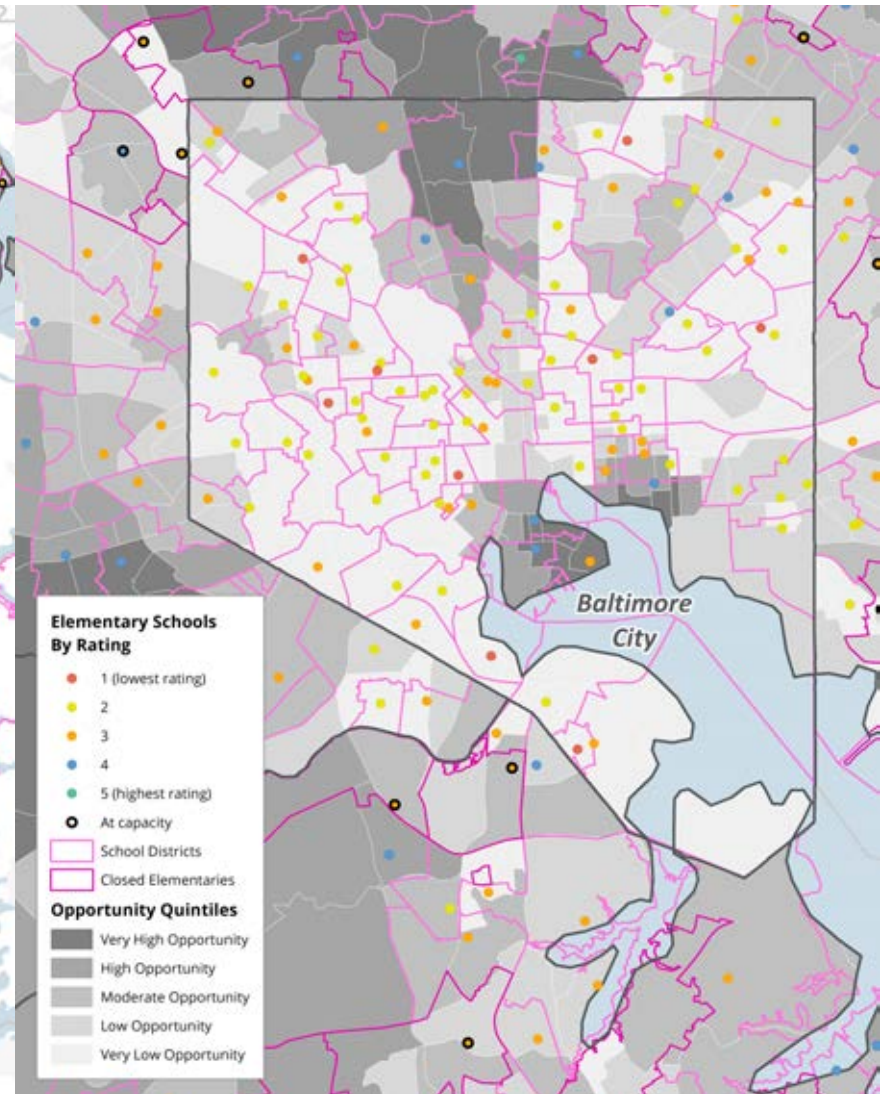


**Figure IV-26.**  
Regional Elementary Schools by Opportunity Quintile



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

**Figure IV-27.**  
Baltimore City Elementary Schools by Opportunity Quintile



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

The maps above illustrate the relationship between housing that is sorted by race and income in the Baltimore region and access to high performing schools. As previously referenced, schools are a reflection of the communities that they represent, so these results are not surprising. The maps above show the following notable patterns:

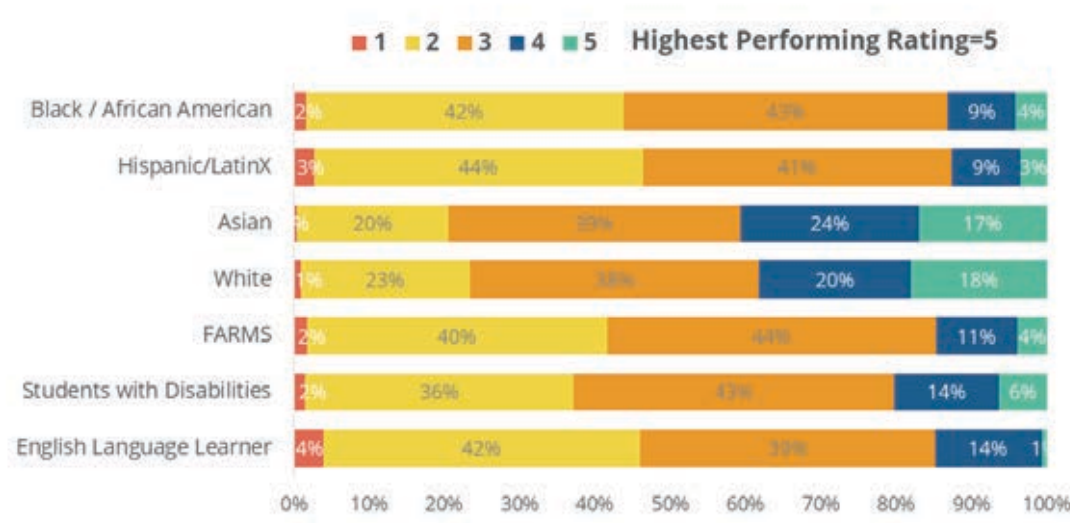
- At capacity schools in Anne Arundel County are those that are highly rated in the central and south county and moderately rated in the north county; largely highly rated in Howard County; and both highly and moderately rated in Baltimore County. Demand for at capacity schools appears to be related to school quality and desirable locations. Baltimore County and Anne Arundel have the most schools that are at or over capacity based on locally defined metrics;
- Areas closed to development through APFO due to overcapacity schools (as determined by each county) account for a large portion of Baltimore County that is in close proximity to Baltimore City (the majority of these areas are closed when considering at capacity middle and high schools), and significant portions of Anne Arundel County and Howard County;
- School attendance boundary changes could increase racial and income integration in Baltimore County and Anne Arundel County (which already has an adjustment process underway);
- As school performance is a factor of the opportunity quintile, location of high performing schools is highly correlated with high opportunity areas;
- Lower performing schools are clustered in census tracts with higher Black and Latino populations and census tracts with lower median rent and median home values;
- Overall, the maps provide a stark visualization of the relationship between income and Black and Latino population concentration related to housing opportunity and school ratings.

Figures IV-28 through IV-32 show the attendance of students by school rating based on race, income, and special services for each school district in the Baltimore Region included in this study. Across all county districts, Black and Latino students are overrepresented in the lowest performing schools, as are Free and Reduced Lunch Students (FARMS), students with disabilities, and English Language Learners (ELL).

In Baltimore County, for example, just over 10% of Black/African American students are enrolled in schools with a rating of 4 or 5 (highest performance), while nearly 40% of White students are enrolled in schools rated 4 and 5. This pattern is consistent across all

subgroups compared to White Students in all districts and reflects the boundary configurations presented in the maps above.<sup>13</sup>

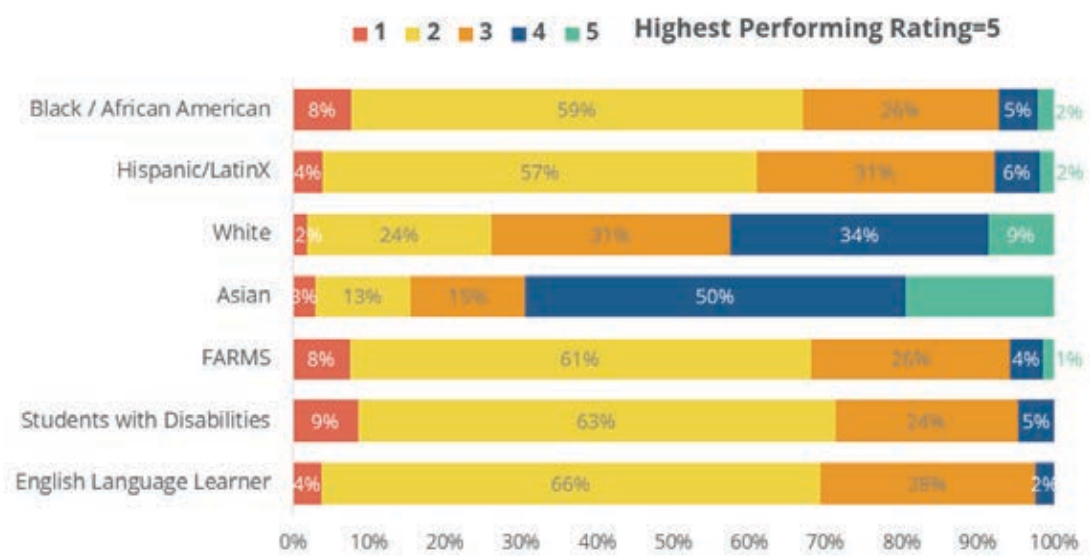
**Figure IV-28.**  
**Baltimore County Student Subgroup Enrollment by School Rating**



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

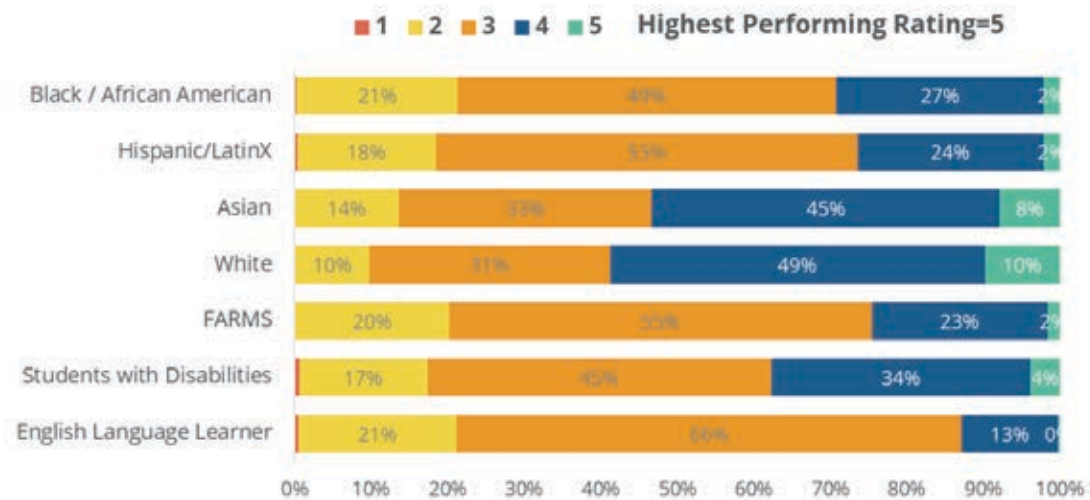
<sup>13</sup> Students of all racial identities are included in the data for FARMS, special education, and ELL.

**Figure IV-29.**  
**Baltimore City Student Subgroup Enrollment by School Rating**



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.

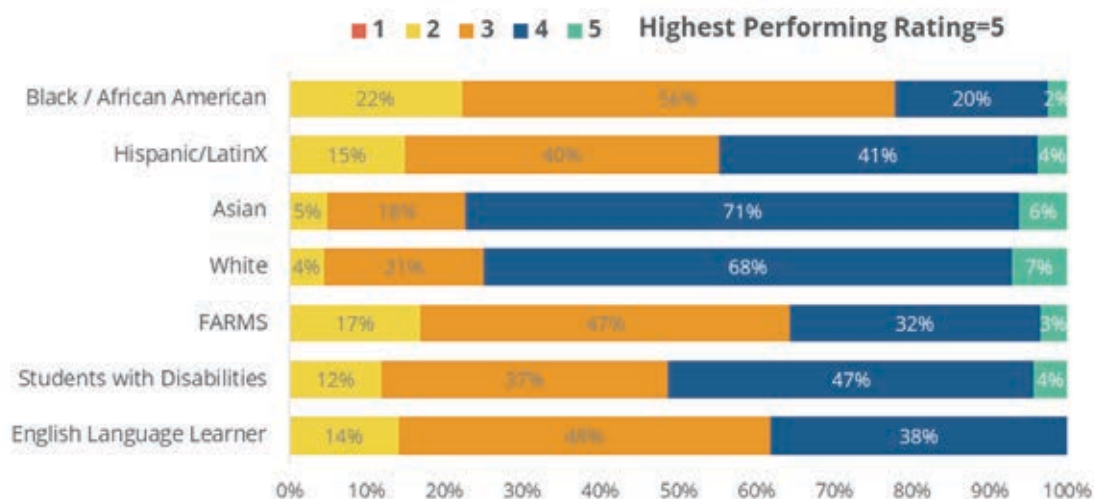
**Figure IV-30.**  
**Anne Arundel County Student Subgroup Enrollment by School Rating**



Note: 2022-2023 Academic Year.  
Source: Maryland State Department of Education.



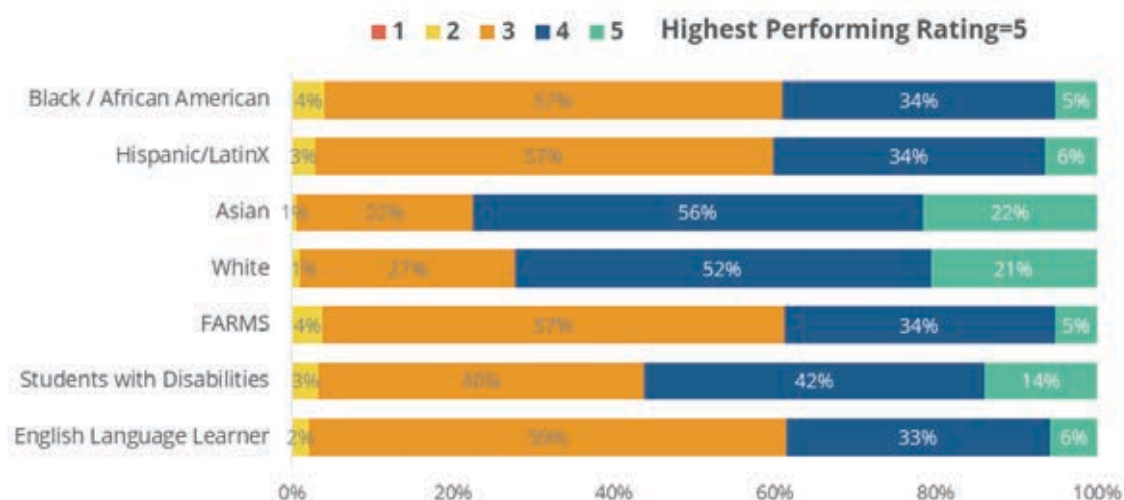
**Figure IV-31.**  
**Harford County Student Subgroup Enrollment by School Rating**



Note: 2022-2023 Academic Year.

Source: Maryland State Department of Education.

**Figure IV-32.**  
**Howard County Student Subgroup Enrollment by School Rating**



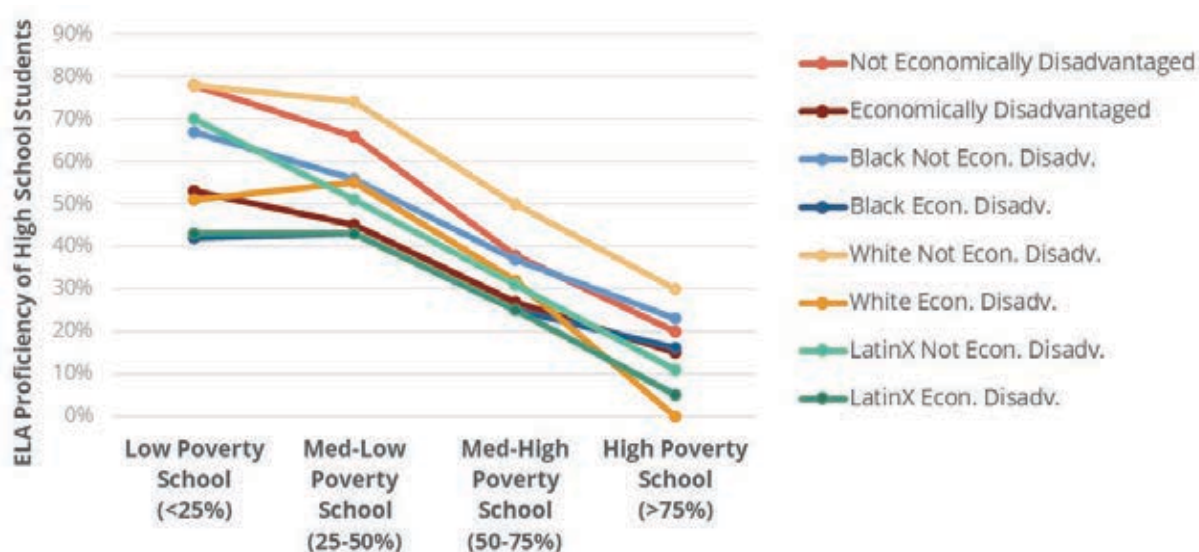
Note: 2022-2023 Academic Year.

Source: Maryland State Department of Education.

Schools with high concentrations of lower income students are more likely to have lower academic outcomes and therefore ratings due to district and funding structures that do not adequately compensate for insufficient instructional resources.

The figure below charts the drop in English Language proficiency levels for high school students in the Baltimore region as school concentration of economically disadvantaged students increases. The figure demonstrates that all students, regardless of that student's individual income and race, are impacted negatively by attendance at schools of concentrated economic disadvantage. This is an important distinction from overall school ratings and proficiency in isolation which are an effect of school income composition.

**Figure IV-33.**  
**School Economic Disadvantage Concentration and Proficiency**



Note: 2022-2023 school year. Poverty classifications: High > 75%, Medium high = 50%-75%, Medium low = 25%-50%, Low: <25%.

Source: Maryland State Department of Education.

**Chronic absenteeism and mobility.** Chronic absenteeism, frequent mobility between schools, and low attendance are particularly prevalent in schools with high poverty concentrations and directly impact student outcomes not only for the student who is absent, but also for the other students in the classroom as it presents an additional challenge for the teacher to adequately progress through the curriculum.<sup>14</sup> Absenteeism is also associated with lower rates of high school graduation. Students who frequently change schools often due to housing instability experience significant academic loss during

<sup>14</sup> Michael A. Gottfried, "Chronic Absenteeism in the Classroom Context: Effects on Achievement," *Urban Education* (January 2019), 54 (1).



transitions to a new school, and high levels of mobility also create added challenges for the instructional staff impacting all students in the classroom.<sup>15</sup>

Chronic absenteeism is defined as being absent more than 10% of the school year for any reason and is often linked with housing challenges including homelessness, job accessibility, inadequate transportation, student disability and illness. Recent data has shown that the pandemic resulted in a spike of chronic absenteeism across the nation which has not subsided. Increases in chronic absenteeism in Maryland which ranked the 22<sup>nd</sup> highest in the nation with one third of students chronically absent in 2022, not surprisingly correlates with overall reductions in proficiency in the 2021-2022 school year.<sup>16</sup>

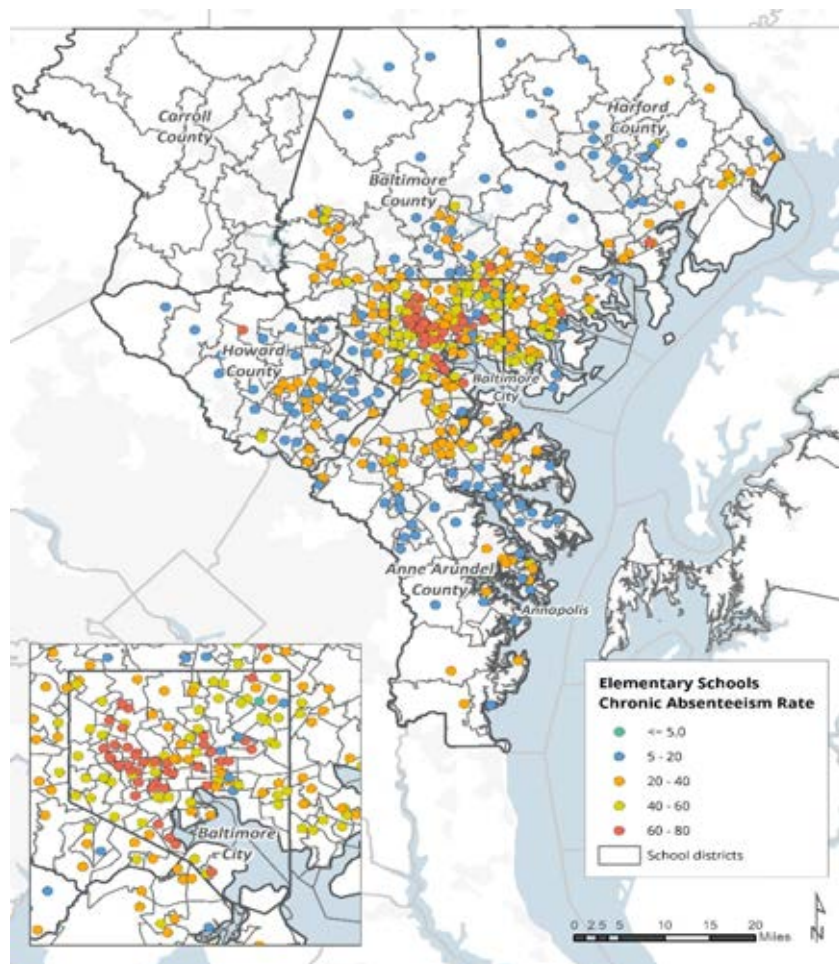
The maps below indicate very high levels of both chronic absenteeism and mobility in not only Baltimore City Schools, but also in the northern section of Anne Arundel, east and west Baltimore County, around Columbia in Howard County (chronic absenteeism only) and in the Joppatowne area of Harford County (which, as discussed earlier, also has environmental justice challenges).

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<sup>15</sup> [Student Mobility: Causes, Consequences, and Solutions | National Education Policy Center \(colorado.edu\)](#)

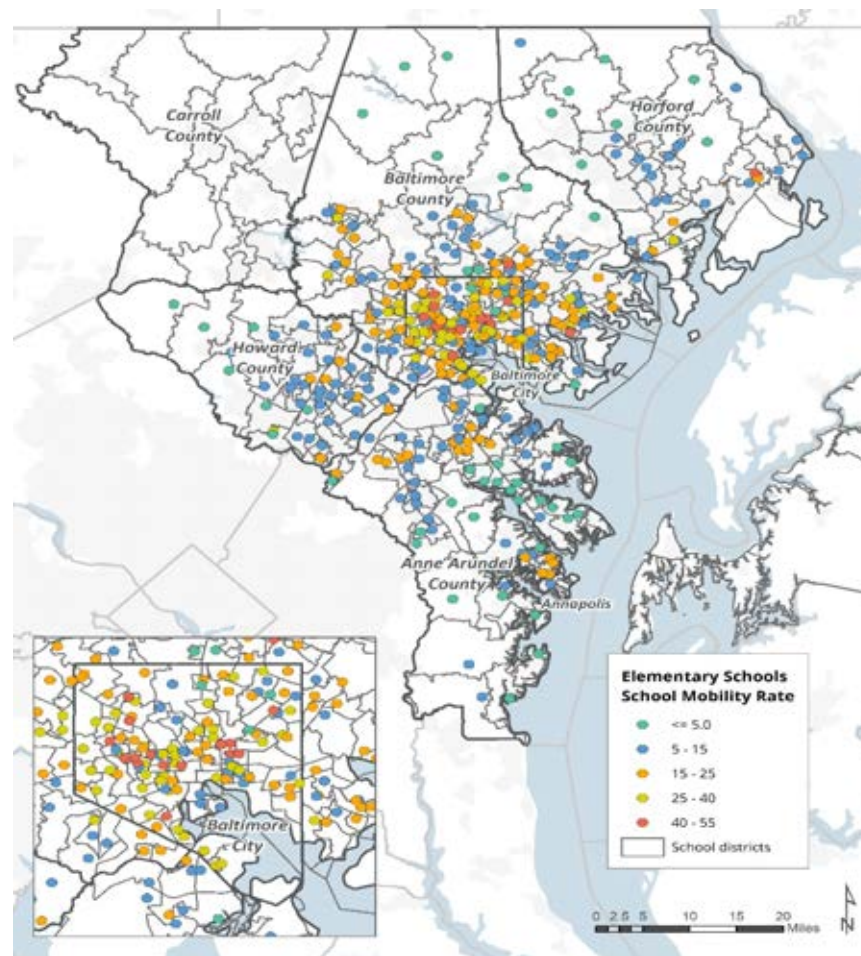
<sup>16</sup> [One-Third of Students Chronically Absent as Test Scores Drop: Maryland Ranks 22nd in 2024 KIDS COUNT Data Book - Maryland Center on Economic Policy \(mdeconomy.org\)](#)

**Figure IV-34.**  
**Chronic Absenteeism by Elementary School**



Note: 2022-2023 Academic Year.  
 Source: Maryland State Department of Education.

**Figure IV-35.**  
**Mobility Rate by Elementary School**



Note: 2022-2023 Academic Year.  
 Source: Maryland State Department of Education.

**Mental health resources and school counselors.** A critical resource in assisting students facing challenges with housing, family environment and mental health and disrupting trajectories of school/labor market disengagement are school and community counselors.

The Blueprint for Maryland's Future shows that Maryland school staffing of mental and behavioral health professionals is poor. Inadequate staffing of counseling and psychologists in schools has been directly linked to higher absenteeism and lower academic outcomes.<sup>17</sup> Higher poverty schools in particular show improved results in attendance, academic proficiency, and high school graduation with lower student to counselor ratios.

Maryland's school counselor to student ratio is 327:1 in 2021-2022 whereas the recommended ratio is 250:1 and the national average is 408:1. Staffing of school psychologists is even less with only 1 per 1027 students with a recommended ration of 1 to 500-750 students.<sup>18</sup> Following the pandemic, adequate staffing of school counselors is critical to providing students with requisite academic, mental and behavioral support.

Recognizing the critical need for additional mental health resources, the Blueprint for Maryland's Future has expanded funding for holistic student services with \$25 million that began in 2022, increasing by \$25 million per year capped at \$125 million for 2026 and beyond. School districts are required to establish a "Coordinated Community Supports" team that involves educators, behavioral health professionals, nonprofits, and health departments to address the entire spectrum of student needs using the community school model. Baltimore County has recently expanded mental health service access to students through Talkspace and has received a \$7.8 million state grant through the Blueprint for Maryland's Future that will allow 8 community health providers to serve all grade levels across 100 schools in the county.

**Disconnected youth** or "opportunity youth" are 16- to 24-year-olds who are neither enrolled in school nor in the labor force.

In 2021, Baltimore City alone had 11,800 disconnected youth, or nearly 17% of the population for this age group. This is notable as the average youth disconnection rate for urban centers nationwide is 11% (however, rural areas typically having larger populations of disconnected youth at an average of 17%). The surrounding counties all had lower

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<sup>17</sup> <https://www.schoolcounselor.org/getmedia/5157ef82-d2e8-4b4d-8659-a957f14b7875/Ratios-Student-Outcomes-Research-Report.pdf>

<sup>18</sup> [Behavioral Health Expansion - Maryland State Education Association \(marylandeducators.org\)](https://www.marylandeducators.org/behavioral-health-expansion)

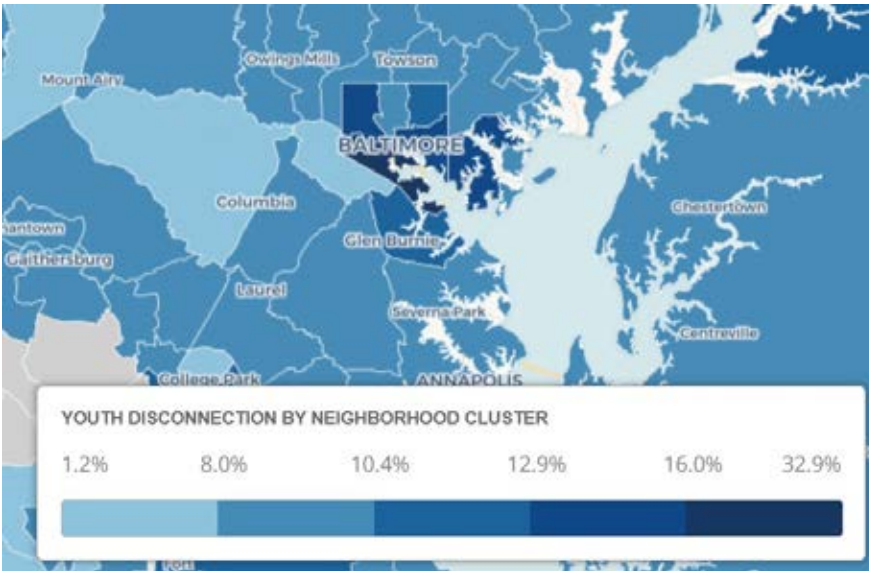
percentages at roughly 9.5%, resulting in an estimated 33,800 disconnected youth the Baltimore-Columbia-Towson MSA.

Baltimore City's high percentage of disconnected youth signals a gap in services, either throughout the high school experience, or following graduation to effectively build sustainable career or education pathways for these youth representing a considerable missed opportunity. Groups with protected characteristics are disproportionately more likely to become disconnected youth, with American Indian and Black/African American males having the highest percentages relative to other groups.

The estimated potential cost of not altering the trajectory of a 21-year-old disconnected youth is nearly \$1 million per individual over a lifetime, which includes lost tax revenue and social costs comprising health expenses, potential crime or incarceration, and social services based on national averages.<sup>19</sup>

**Figure IV-36.**  
**Disconnected Youth**  
**in the Baltimore**  
**Region**

Source: Measure of America,  
American Community Survey 2017-  
2021



School counselors provide critical interventions in addressing risk factors associated with disconnected youth and are instrumental in navigating career pathways and educational success. School counselors and mental health professionals also play a critical role in a school's culture, climate and behavior interventions.

**School facilities.** Similar to school districts across the United States, the Baltimore region is challenged with the considerable cost of maintaining and updating aging schools. Deferred maintenance of many schools for decades resulted in schools that have been

<sup>19</sup> Clive R. Belfield, Henry M. Levin, & Rachel Rosen, "The Economic Value of Opportunity Youth," Corporation for National and Community Service, <https://files.eric.ed.gov/fulltext/ED528650.pdf>

unhealthy and costly to maintain, impacting the learning environment, overall health of students, and a general perception of community well-being.

Schools that are well maintained are often a community anchor, providing safe gathering space and are usually the center for neighborhood civic activities such as voting. Schools that are thriving can also attract neighborhood investment.

Unfortunately, over recent decades Baltimore City Schools has faced large, aging school buildings with a dire maintenance backlog amid City population loss and declines in enrolled students. As a result, it has closed 30 small schools over the last 20 years, in mostly lower income predominantly Black neighborhoods. Those closures are very difficult for those neighborhoods.

Fortunately, through the 21st Century Schools initiative funded by Baltimore City and the State of Maryland, the Maryland Stadium Authority and Baltimore City Schools have invested \$1 billion to rebuild 12 schools and renovate another 16, also predominantly in Black neighborhoods. In conjunction with this investment, the City Department of Planning launched a program called INSPIRE (Investing in Neighborhoods and Schools to Promote Improvement, Revitalization, and Excellence) that focuses on the neighborhoods immediately surrounding each of the modernized schools that are part of the 21st Century program, within one-quarter mile surrounding each school to incentivize neighborhood development.

As of April 2023, Baltimore City Schools had reduced the number of schools without air conditioning from 75 in 2017 to eleven. Six of those were slated to be upgraded by summer 2024, with the other five scheduled to be resolved as part of larger renovations or by closure.

**High quality Early Childhood Education (ECE) / PreK.** According to research from the Minneapolis Federal Reserve, early childhood “programs that offer enriched experiences for children and involve parents and other caregivers provide benefits for all children—but have the strongest impact on children from disadvantaged environments.”<sup>20</sup>

As previously discussed, children arrive in kindergarten with vastly different resources and exposures to reading and math. The public school is then tasked with bringing all of these students to a predetermined level of proficiency that advantages schools with higher income students and penalizes (through ratings) schools who have a significantly different starting point (typically related to housing and family instability, food and resource insecurity, and health inequities). Investment in high quality universally free ECE/PreK

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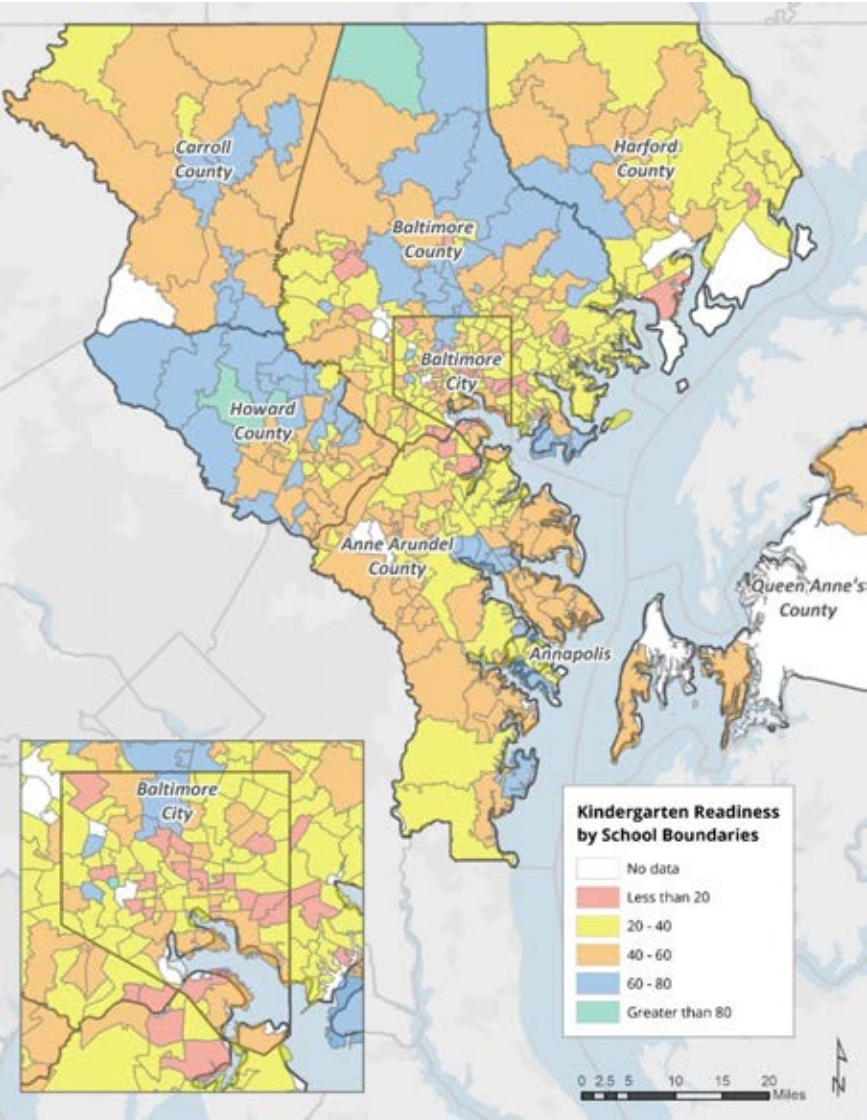
<sup>20</sup> Rob Grunewald, “Investments in Young Children Yield High Public Returns,” Federal Reserve Bank of Minneapolis, 2016, [www.philadelphiafed.org/community-development/publications/cascade/93/04\\_investments-in-young-children](http://www.philadelphiafed.org/community-development/publications/cascade/93/04_investments-in-young-children)



programs is an effective way to is an effective way to help disadvantaged students effectively access educational opportunity. .

The map below shows the percentage of students who are ready for kindergarten upon enrollment and illustrates differences across elementary school zones in the Baltimore region. The wide variations across and within districts confirm the need for high quality ECE/PreK expansion across the region targeted to lower income census tract areas. Lack of Kindergarten readiness is prevalent across the region—not just in lower income areas.

**Figure IV-37.**  
**Baltimore Region Kindergarten Readiness by Elementary School Boundary**



Note: Shading indicates percentage of students who are kindergarten ready upon enrollment.

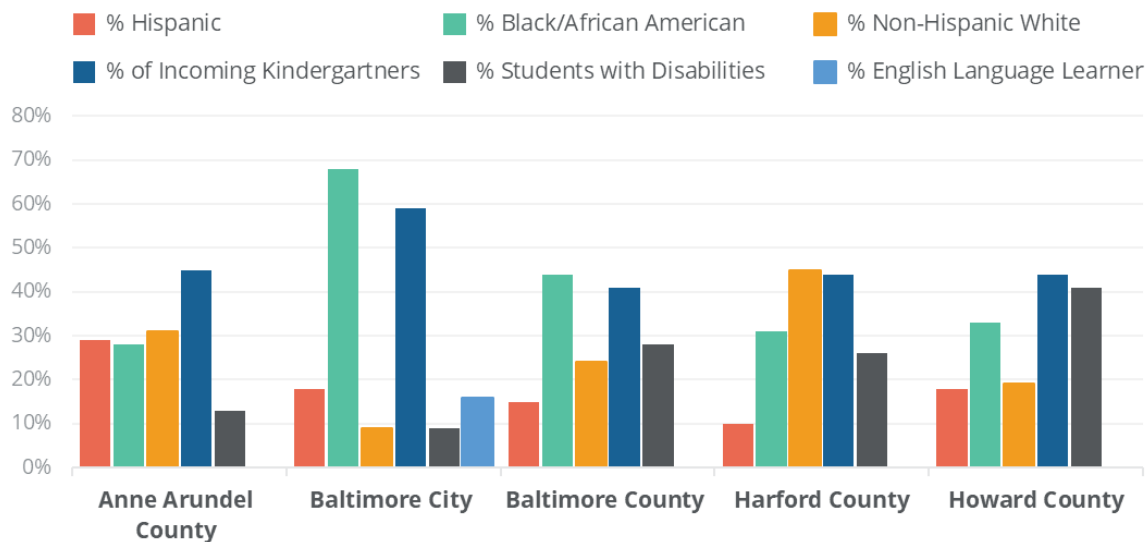
Source: 2023 Maryland State Board of Education



Figure IV-38 shows the percentage of students by student group who are enrolled in PreK programs at public elementary schools by county district.<sup>21</sup> Less than half of students who entered kindergarten in 2022 were enrolled in public PreK the year prior in all counties except for Baltimore City Schools which had enrollment of nearly 60%.

**Figure IV-38.**

**Public ECE/PreK Enrollment by County and Student Group 2021**



Note: Incoming kindergarten students indicate the number of students enrolled in kindergarten the next school year.

Source: Maryland State Department of Education.

The first pillar or priority for the Blueprint for Maryland’s Future is to expand universal PreK for all 3- and 4-year-olds across all schools. While significant funding is attached to this goal, budget and space constraints will necessitate a transition towards offering universal free PreK over the period of several years. The current status by county district is as follows:

- Anne Arundel – “AACPS has converted 4-year-old Pre-Kindergarten programs to full-day in 61 schools. This year we launched 3-year-old Pre-Kindergarten in eight schools. The multi-year approach has allowed AACPS to meet the Blueprint requirements of one certified teacher and one qualified Teacher assistant/Paraprofessional in each classroom. As we continue to expand Pre-Kindergarten opportunities to eligible families, we will adjust operational needs as necessary.” Additionally, AACPS has conducted a landscape analysis of current school facilities to identify potential space for PreK expansion. PreK has also been included in district boundary change discussions and the district has created a PreK addition fund. Expansion to universal

<sup>21</sup> As the most recent data available is 2021, it does not account for increases in prekindergarten enrollment that have occurred following requirement of the Blueprint for Maryland Education detailed below.

PreK will require additional state and local funding and repurposing or leasing of additional facilities to meet the requirements of the Blueprint.

- Baltimore City – “Full-day pre-k is currently offered in the large majority of City Schools’ elementary and elementary/middle schools. To determine the extent of operational changes necessitated by expanded pre-k eligibility, City Schools, in partnership with the ECAC, will work with the Baltimore City Health Department during SY23-24 to identify the likely population of 3- and 4-year-olds in individual school zones by year for the next ten years through consideration of factors such as census, birth rate, and other data, as well as the existence of other pre-k providers and care settings in individual neighborhoods. (As noted in question 1, some of this research already exists.) This analysis will provide data to fold into City Schools’ annual process of making enrollment projections, used to inform facilities, budget, staffing, and other decision-making.
- Baltimore County – “BCPS is making numerous operational system changes to support successful prekindergarten expansion including merging early childhood general and special education sessions to eliminate parallel instructional models and best utilize space and human resources to serve children.” In order to address the additional staff requirements of implementing full day PreK, BCPS is forming partnerships with local colleges and universities to support “grow our own” efforts to increase the number of qualified staff members.
- Harford County – HCPS is addressing capacity issues with PreK expansion and has requested local funding to complete a scope study to evaluate addition/modernization potential at schools with the highest systemic needs.
- Howard – “HCPSS is planning incremental increases to the number of available slots for eligible students. Initial efforts have focused on the conversion of the existing half-day programs for 4-year-olds to full-day programs for eligible 4-year-olds. Planning has also included additional slots for the expansion of the programs to address the increased service range.” Howard County is also faced with physical space limitations and is reviewing all possibilities for conversion to allow for added PreK classroom space.

## Overview of Equity and Outcomes in Education

Figure IV-40 provides an overview of reading/math proficiency and school factors impacting academic outcomes in all schools of Baltimore County, Baltimore City, Anne Arundel County, Howard County and Harford County by school racial segregation and economic disadvantage concentration as well as school spending per student.<sup>22</sup>

The region-wide figure shows how schools' levels of economic disadvantage (poverty), racial concentration, and academic outcomes correlate. The data reveal the following:

- Racially diverse low poverty schools perform equally to low poverty majority White schools;
- The majority of schools that are high population Black or Hispanic/Latino are high and medium high economic disadvantaged, whereas the majority of high population non-Hispanic White schools are low poverty.
- Chronic absenteeism and mobility are a significant issue for segregated schools with high economic disadvantage signally instability in housing and insufficient school counselor resources. Chronic absenteeism and mobility impact the entire school environment and manifest in overall lower proficiency and school ratings;
- Schools with higher concentrations of Black and Hispanic students have higher percentages of inexperienced teachers in schools that are medium-low economic disadvantage;
- Local and state average spending per pupil is lower in schools with more than 75% Black students across all school income categories (with the exception of medium-high economic disadvantage schools, where it is roughly equivalent to Hispanic concentrated schools), at 32% less than diverse schools for high to medium high economically disadvantaged schools and 17% percent less than predominantly non-Hispanic White schools in medium-low economically disadvantage schools;
- Spending per pupil is higher in the higher poverty and racially segregated schools—however, it is likely insufficient to compensate for the extra resources available at middle to low and low poverty schools due to parent contributions through Parent

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<sup>22</sup> Highly segregated is defined as more than 75% of one race represented in the school population. Economic disadvantage population percentage is based on direct certification in federal assistance programs versus Free and Reduced Meals (FARMs) certification as many schools participate in universal free lunch through the Community Eligibility Provision and therefore do not collect forms/data on family income. Note that using economic disadvantage, however, is a potential underestimation as it is dependent upon state requirements for federal aid qualification and frequent under enrollment in SNAP. Economic disadvantage concentration is the Title 1 classification previously referenced.

Teacher Associations and student populations with fewer challenges related to housing, income and family stability.

**Figure IV-40.**  
**School Attributes by Economic Disadvantage and Race/Ethnicity Concentration**

	High Economic Disadvantage				Medium High Economic Disadvantage			
	Black	Hispanic	White	Diverse	Black	Hispanic	White	Diverse
Number of schools	80	1	0	11	29	4	0	94
Reading proficiency percent	15%	23%	N/A	20%	30%	15%	N/A	28%
Math proficiency percent	9%	9%	N/A	14%	11%	5%	N/A	15%
School rating	2.0	3.0	N/A	2.5	2.5	2.0	N/A	2.7
Chronic absenteeism percent	64%	29%	N/A	58%	48%	43%	N/A	43%
Mobility rate	32%	17%	N/A	26%	21%	20%	N/A	20%
Percent inexperienced teachers	20%	12%	N/A	23%	23%	31%	N/A	23%
Local + state spending per student	\$23,093	\$27,330	N/A	\$30,584	\$19,919	\$19,343	N/A	\$26,263
	Medium Low Economic Disadvantage				Low Economic Disadvantage			
	Black	Hispanic	White	Diverse	Black	Hispanic	White	Diverse
Number of schools	20	1	11	171	0	0	45	107
Reading proficiency percent	35%	24%	54%	42%	N/A	N/A	70%	69%
Math proficiency percent	17%	N/A	31%	24%	N/A	N/A	47%	45%
School rating	2.68	3	3.82	3.04	N/A	N/A	4.16	4.15
Chronic absenteeism percent	35%	18%	23%	32%	N/A	N/A	16%	15%
Mobility rate	18%	16%	8%	15%	N/A	N/A	8%	8%
Percent inexperienced teachers	23%	19%	12%	18%	N/A	N/A	9%	10%
Local + state spending per student	\$16,156	\$20,665	\$18,944	\$17,773	N/A	N/A	\$15,338	\$15,501

Note: All data are averages for each school racial and economic disadvantage concentration category.

Source: Maryland State Department of Education, 2022-2023 school year data.

## **Access to Employment and Economic Opportunity**

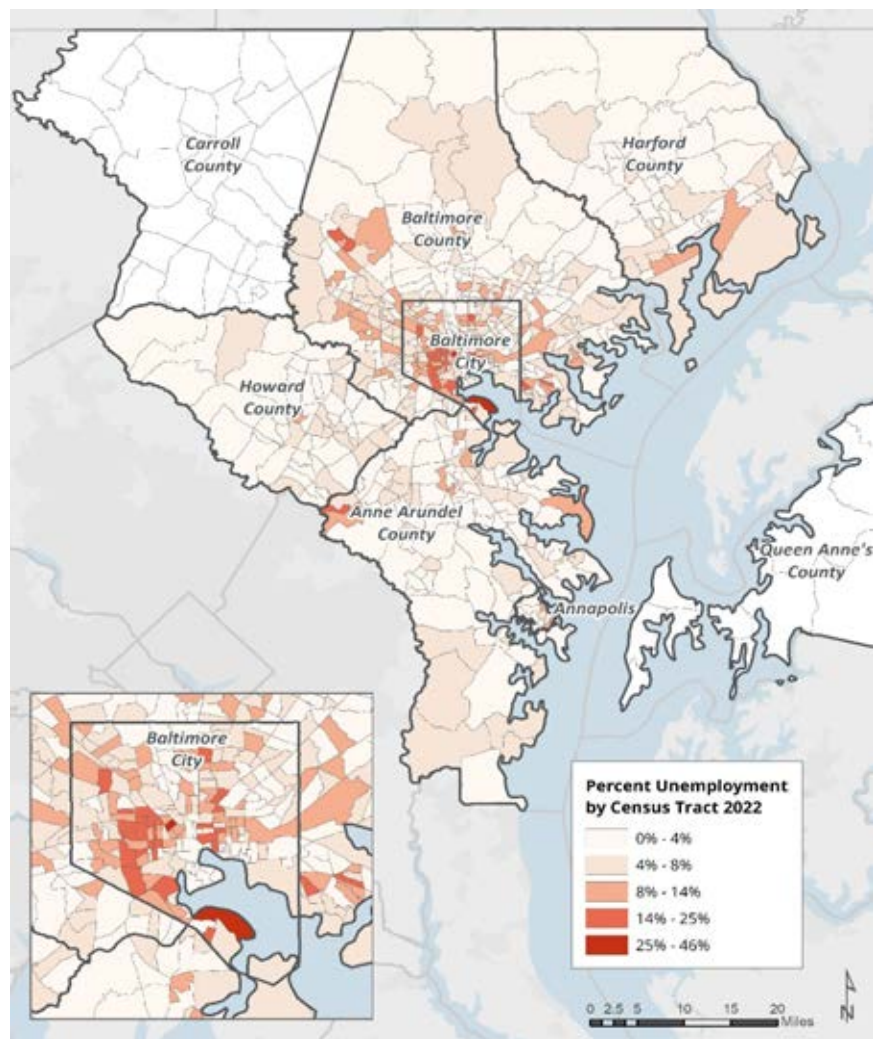
The Baltimore region's current employment landscape reflects the legacy of inequitable opportunity in education and training coupled with a transition of the region's economy from manufacturing-based employment to industries requiring higher levels of education that have not been equitably attainable for Black/African American households. Exacerbating the loss of manufacturing jobs has been the loss of public jobs due to privatization—jobs were previously accessible to Black/African American workers without a college education.

In the City of Baltimore, once thriving neighborhoods were effectively blocked from the larger Baltimore regional labor market growth through the construction of highways that cut off these neighborhoods while enabling movement of higher income residents to affluent suburbs.

As seen in Figure IV-41 and IV-42, unemployment is disproportionately high and labor market participation is disproportionately low in the areas of Baltimore City with Black/African American residents and poverty concentrations. Additionally, areas in west Baltimore County, south Harford County, and far east and west Anne Arundel County have higher unemployment rates compared to the rest of the region.



**Figure IV-41.**  
Regional Unemployment by Census Tract



Source: American Community Survey 2022 5 year estimates.

**Figure IV-42.**  
Regional Labor Force Participation by Census Tract

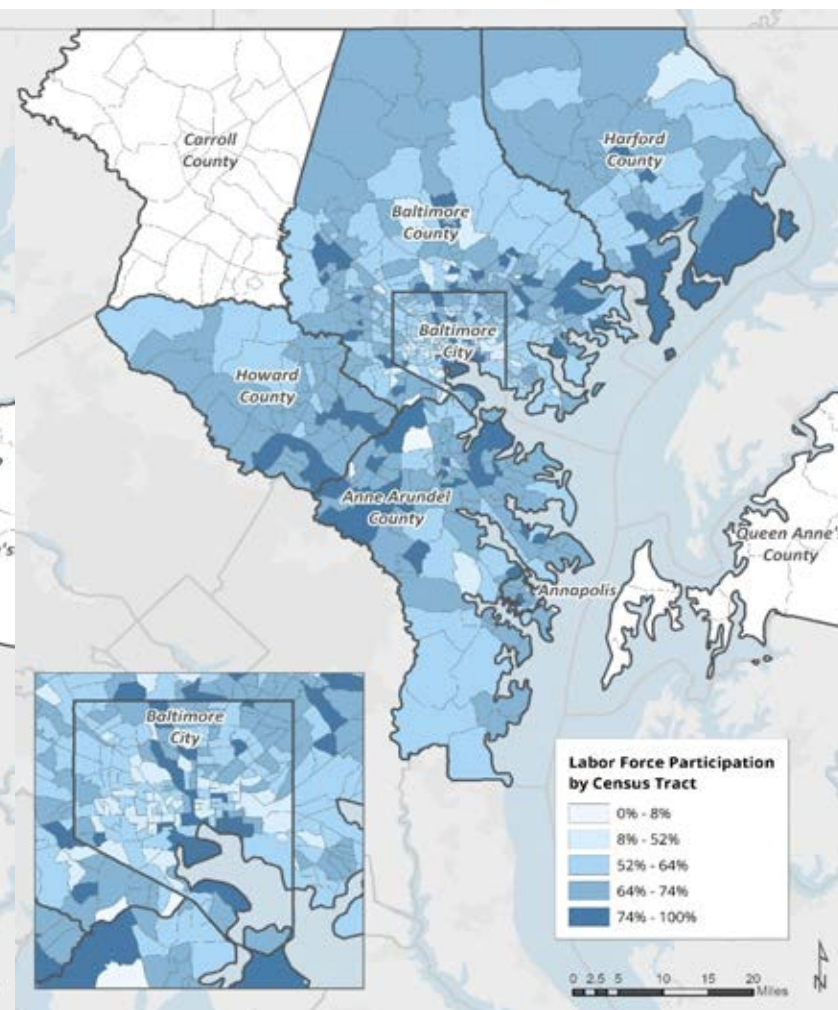


Figure IV-43 below shows the Massachusetts Institute of Technology Living Wage Calculator which can be used to assess the ability to live in the region at different levels of education. Figure IV-44 shows the industry shares of jobs and industry average wage by county, and IV-45 visualizes the level of education required to secure the minimum living wage in the Baltimore region by household type. Based on this data, a single mother would need a graduate degree to live affordably in the Baltimore region.

The largest share of jobs across all counties are in industries most likely to require a college degree or special certification/training such as health and education. Construction, manufacturing and Leisure/Hospitality would be the least likely to require a college degree or special certifications; however, these jobs hold a smaller share of the entire labor market and/or are not paid a living wage (leisure/hospitality).

**Figure IV-43.**  
**Living Wage by County and Family Type**

	Baltimore City	Baltimore County	Anne Arundel	Harford	Howard	Poverty Wage
<b>1 adult</b>	<b>\$20.43</b>	<b>\$23.60</b>	<b>\$26.90</b>	<b>\$23.84</b>	<b>\$26.48</b>	<b>\$7.24</b>
1 child	\$37.40	\$39.87	\$45.69	\$41.64	\$48.80	\$9.83
2 children	\$47.78	\$49.10	\$56.55	\$52.83	\$63.24	\$12.41
<b>2 adults (1 working)</b>	<b>\$28.84</b>	<b>\$32.17</b>	<b>\$36.02</b>	<b>\$32.57</b>	<b>\$35.76</b>	<b>\$9.83</b>
1 child	\$35.08	\$39.05	\$43.81	\$39.71	\$43.62	\$12.41
2 children	\$39.37	\$43.41	\$48.33	\$44.28	\$48.25	\$15.00
<b>2 adults (both working)</b>	<b>\$14.41</b>	<b>\$16.07</b>	<b>\$18.00</b>	<b>\$16.27</b>	<b>\$17.87</b>	<b>\$4.91</b>
1 child	\$20.82	\$22.11	\$25.03	\$23.14	\$26.53	\$6.21
2 children	\$26.29	\$26.91	\$30.44	\$28.75	\$33.83	\$7.50

Source: Massachusetts Institute of Technology, 2024.

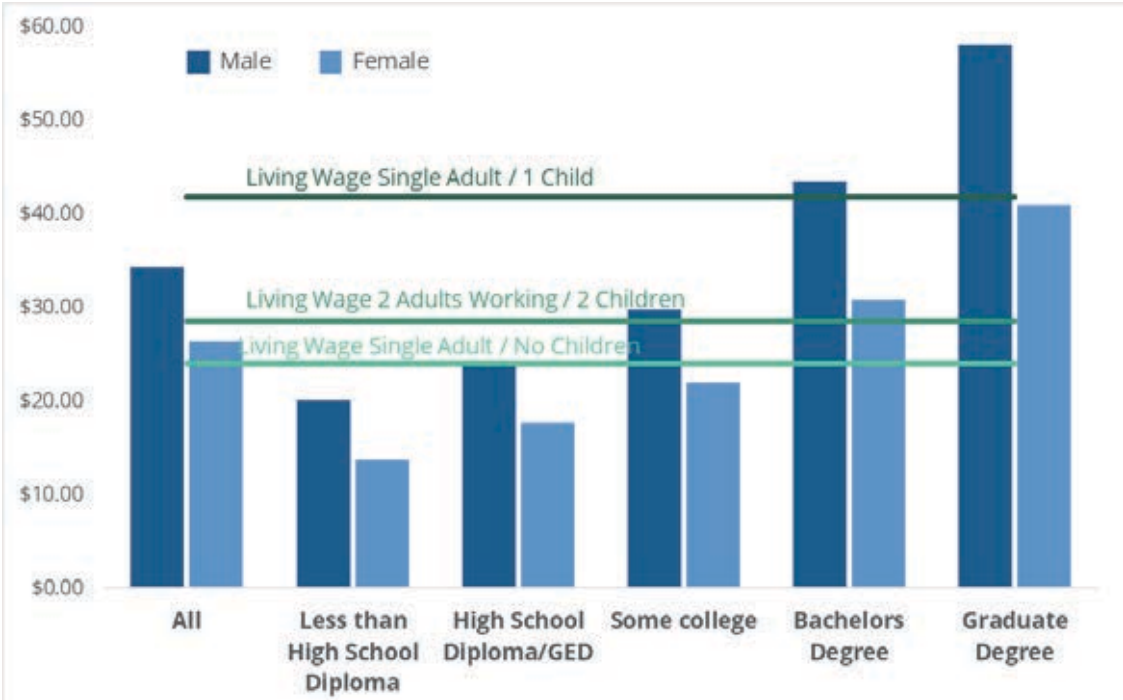
**Figure IV-44.**

**Top 5 Private Industries & Public Jobs: Job Share and Average Wage**

County / Industry	Total Jobs	Share	Average Wage
<b>Anne Arundel</b>	<b>227,534</b>	<b>100%</b>	<b>\$39.98</b>
Trade, Transportation, Utilities	53,741	24%	\$34.65
Professional and Business Services	46,256	20%	\$49.13
Education and health	37,820	17%	\$32.92
Leisure and Hospitality	32,007	14%	\$14.85
Construction	18,862	8%	\$39.85
Manufacturing	18,206	8%	\$76.82
Public (all federal/state/local)	49,721	100%	\$41.96
<b>Baltimore City</b>	<b>266,538</b>	<b>100%</b>	<b>\$44.92</b>
Education and health	101,813	38%	\$40.25
Professional and Business Services	49,212	18%	\$44.95
Trade, Transportation, Utilities	43,184	16%	\$35.75
Leisure and Hospitality	24,751	9%	\$16.98
Financial Activities	14,222	5%	\$93.08
Public (all federal/state/local)	71,986	100%	\$43.03
<b>Baltimore County</b>	<b>311,278</b>	<b>100%</b>	<b>\$36.56</b>
Education and health	74,619	24%	\$28.80
Trade, Transportation, Utilities	20,563	24%	\$27.35
Professional and Business Services	52,673	17%	\$43.10
Leisure and Hospitality	30,953	10%	\$18.62
Financial Activities	25,087	8%	\$63.25
Public (all federal/state/local)	41,156	100%	\$46.75
<b>Harford County</b>	<b>70,670</b>	<b>100%</b>	<b>\$31.02</b>
Trade, Transportation, Utilities	20,563	29%	\$23.95
Education and health	11,762	17%	\$29.13
Professional and Business Services	12,055	17%	\$43.55
Leisure and Hospitality	9,203	13%	\$11.27
Construction	5,936	8%	\$33.55
Public (all federal/state/local)	21,341	100%	\$37.80
<b>Howard County</b>	<b>149,900</b>	<b>100%</b>	<b>\$41.73</b>
Professional and Business Services	47,285	32%	\$57.65
Trade, Transportation, Utilities	33,320	22%	\$36.03
Education and health	21,031	14%	\$29.68
Leisure and Hospitality	14,639	10%	\$13.67
Construction	11,173	7%	\$42.82
Public (all federal/state/local)	14,260	100%	\$42.00

Source: Bureau of Labor Statistics, Quarterly Census of Employment and Wages, 1<sup>st</sup> Quarter 2024.

**Figure IV-45.**  
**Baltimore Region Median Earnings by Educational Attainment and Gender**  
**with Living Wage by Household Type**



Note: Baltimore-Columbia Towson Metropolitan Statistical Area.  
Source: American Community Survey 2023 1 year estimates and Massachusetts Institute of Technology Living Wage Calculator 2024.

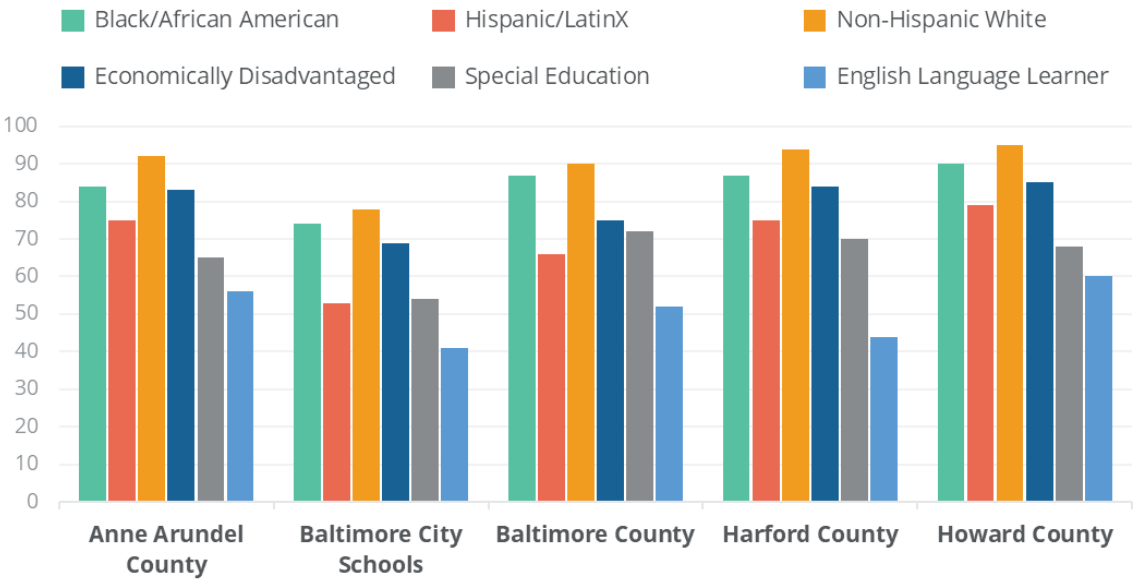
The table below shows education attainment by race, and disproportionate high school graduation and college enrollment for 24 months post-graduation across the counties in this study. Based on the figures above, many residents across the Baltimore region would not find work at a living wage based on the education level required for the industries with the largest share of opportunity indicating a profound and persistent education gap. Hispanic students have the lowest graduation rates by racial group across the region, and ELL students have the lowest graduation rates overall. Howard County has the highest percentages of Black/African American and Hispanic high school and college graduates, with the City of Baltimore having considerably lower educational attainment than the other counties.

**Figure IV-46.**  
**Baltimore Region Education Attainment by Race**

	High School Diploma			Bachelor's Degree		
	Black/African American	Hispanic/Latino	Hispanic White	Black/African American	Hispanic/Latino	Hispanic White
Anne Arundel County	92%	74%	96%	38%	28%	50%
Baltimore City	86%	75%	95%	22%	29%	63%
Baltimore County	94%	75%	93%	36%	29%	47%
Harford County	94%	79%	96%	34%	18%	44%
Howard County	97%	84%	99%	47%	38%	70%

Source: American Community Survey, 2023 1-year estimates.

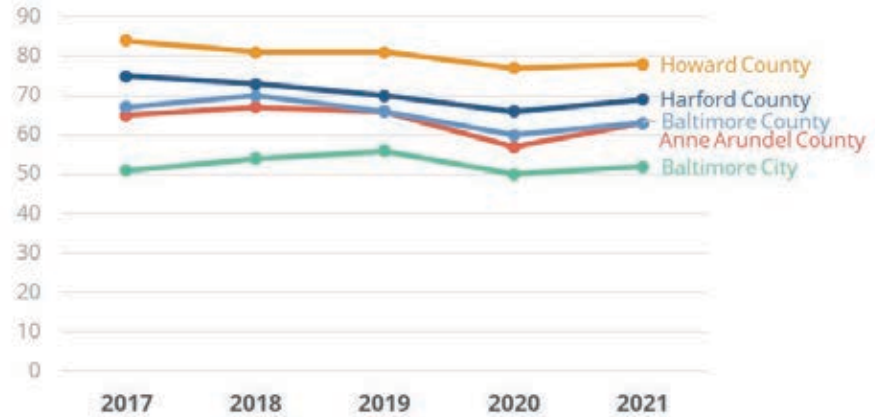
**Figure IV-47.**  
**High School Graduation Rate by Student Group and County 2023**



Source: Maryland State Department of Education.

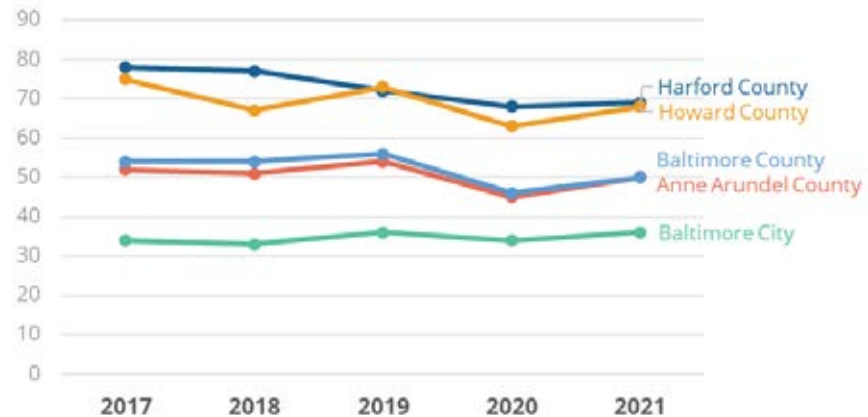
**Figure IV-48.**  
**Black/African**  
**American**  
**College**  
**Attendance 24**  
**Months Post**  
**Graduation**

Source: Maryland State Department of Education, 2023.



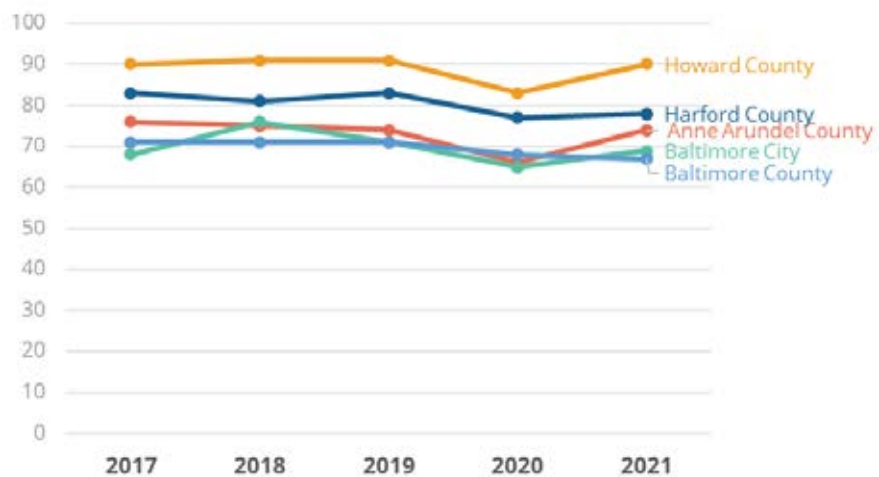
**Figure IV-49.**  
**Hispanic**  
**Student College**  
**Attendance 24**  
**Months Post**  
**Graduation**

Source: Maryland State Department of Education, 2023.



**Figure IV-50.**  
**Non-Hispanic**  
**White Student**  
**College**  
**Attendance 24**  
**Months Post**  
**Graduation**

Source: Maryland State Department of Education, 2023.



These charts highlight the disconnect between the wages paid for needed jobs in the Baltimore region and the cost to live here and raise a family.



The federal Workforce Innovation and Opportunity Act (WIOA) requires jurisdictions to develop regional workforce development plans describing operation and procedures. The Central region of Maryland comprises Anne Arundel, Mid-Maryland, Baltimore County, Baltimore City. To satisfy the requirements of WIOA, the Baltimore Workforce Development Board (BWDB) and Baltimore City Mayor's Office of Employment Development (MOED) have coordinated access points to increase the range of services and participation with organizations outside of the WIOA system. MOED is using a system called "Unite Us" to improve networking and better track progress including barriers and outcomes.

The regional plan conducted an analysis on the top industries for potential job opportunities to coordinate workforce development efforts with the following criteria:

1. Not requiring a bachelor's or professional degree to access, and
2. Having a median wage that would earn a full-time worker at least 125% of the lower-level living standard for a family of three in Baltimore City in 2019 (\$23.19 per hour).

Jobs in health, education, trade, professional services and construction hold the most opportunities with more than 39 targeted occupations, however, overall, only 14% of jobs in the region meet these criteria meaning that 86% of jobs either require at least a college degree, or do not pay at least \$23.19 per hour. This signals that even a robust workforce development program will not completely address the gap between skills and jobs available in the region that are adequately paid. Ultimately, "Baltimore has many good jobs, but Baltimoreans aren't working most of them."<sup>23</sup> These are predominantly higher paid jobs requiring a college degree that are taken by in-commuters living in surrounding counties.

Figure IV-51 shows the distribution of in- and out-commuters between the counties in the region, demonstrating that Baltimore City has a substantially lower number of resident workers than Baltimore and Anne Arundel Counties. Conversely, Howard County shows a large percentage of out commuters. The implication for workers living in the City of Baltimore with protected characteristics who disproportionately have less education opportunities (and therefore certifications, degrees, skills) and rely more heavily on public transit is a considerable job and housing mismatch. This would reasonably indicate that both more affordable housing opportunities should be incentivized outside of the City of Baltimore, and that regional improvement to public transit should be prioritized—for example, through revision of zoning laws near job centers suburban, job-rich counties to

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<sup>23</sup> [Microsoft Word - Local Workforce Plan 2020-2024 BCity Updates 2023 8.23.2023 Final Approved \(baltimorecity.gov\)](#)

allow higher densities, and through Transit Oriented Development with inclusionary requirements.

**Figure IV-51.**  
**Regional Job Inflow/Outflow**

Job Inflow / Outflow	Baltimore City		Baltimore County		Arundel County		Harford County		Howard County	
	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.	Num.	Pct.
Employed in the County	322,450	100%	372,707	100%	244,625	100%	78,661	100%	174,196	100%
In-commuters	222,608	56%	218,937	59%	152,833	63%	37,925	48%	131,807	76%
Resident workers	99,842	44%	153,750	41%	91,792	38%	40,736	52%	42,389	24%
Living in the County	229,094	100%	380,185	100%	245,986	100%	117,478	100%	150,422	100%
Out-commuters	129,252	69%	226,415	60%	154,194	63%	76,742	35%	108,033	72%
Resident workers	99,842	31%	153,750	40%	97,792	37%	40,736	65%	42,389	28%

Note: 2021.

Source: Longitudinal Employer-Household Dynamics, On the Map.

The City of Baltimore has historically lacked equitable access to capital for Black residents for small business and mortgage lending and Black/African American business owners are dramatically underrepresented in the City of Baltimore. Although brick and mortar banks have become less commonplace universally, they still represent an important connection with the financial infrastructure requisite to accessing capital and have scant visibility in the City of Baltimore's predominantly Black/African American neighborhoods.

The impact of supporting Black/African American business development in Baltimore to approach percentage ownership equivalent to population proportion was analyzed in a study by the Brookings Institution.<sup>24</sup> The effect of Black/African American business is particularly profound in Baltimore with extremely low numbers of Black/African American owned businesses and presents an opportunity for both Black/African American job growth and community development. Using data from the Census Annual Business Survey Program for 2018 and 2019, the study showed that an increase of Black/African owned businesses to 35% of businesses in the Baltimore-Columbia-Towson Metropolitan Statistical Area proportionate to population versus the actual 5%, would result in more than 20,000 additional Black/African American businesses, creating nearly 11,000 jobs.

Support for entrepreneurial projects and small business development also positively impacts people with disabilities. A 2022 report by the National Disability Institute found

<sup>24</sup> [https://www.brookings.edu/wp-content/uploads/2022/02/Black-business-report\\_PDF.pdf](https://www.brookings.edu/wp-content/uploads/2022/02/Black-business-report_PDF.pdf)

that people with disabilities have higher percentages of business ownership among working age adults across all age groups but face barriers in accessing start up assistance.<sup>25</sup> Entrepreneurial business support is also an important employment option for people with disabilities who face considerable labor market barriers including discrimination and access to employment opportunities that have sufficient accommodation.

Innovation Works in the City of Baltimore launched in 2018 to address the vast disparities in access to capital and extreme gaps in Black business ownership impacting opportunity and neighborhood development. The project has demonstrated success in providing the mentorship, capital and job opportunities requisite to attracting investment in Baltimore's distressed neighborhoods which directly impacts housing, safe neighborhood environments and quality of schools. Additionally, an executive order recently signed by Governor Wes Moore that will, "establish Reinvest Baltimore, a coordinated effort between the State of Maryland, Baltimore City, and nonprofit and for-profit partners to eliminate concentrations of vacant properties, revitalize neighborhoods and maximize the economic potential and quality of life for residents in Baltimore City" signals increased attention and commitment to correcting the extreme inequities of opportunity across the City of Baltimore.<sup>26</sup>

## **Transportation and Geographic Disconnection**

The Federal Highway Act of 1956 paved the way for the razing and disconnection of low-income and highly segregated neighborhoods across the United States, displacing nearly half a million people throughout the 1950's to the 1970's. Highway dissection of predominantly low-income Black neighborhoods destroyed thriving community businesses and homes exacerbating disinvestment and reinforcing redlined zoning across urban neighborhoods; this legacy of disconnection and isolation continues today.

In Baltimore, the infamous "Highway to Nowhere" project in 1969 which destroyed 971 homes and 62 African American businesses created a commute time 3x longer for residents trying to access jobs downtown isolating residents from resources perpetuating the cycle of disinvestment and poverty.<sup>27</sup> The highway project was never completed, and instead left remnants of the project and a reminder of the community destruction that occurred which continues to create a barrier for residents in west Baltimore to accessing economic opportunity.

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<sup>25</sup> [Small Business Ownership by People with Disabilities \(nationaldisabilityinstitute.org\)](https://nationaldisabilityinstitute.org/)

<sup>26</sup> [Governor Moore Signs Executive Order to Maximize Economic Potential for Neighborhoods in Baltimore City - Press Releases - News - Office of Governor Wes Moore \(maryland.gov\)](https://www.maryland.gov/governor/newsroom/Pages/Governor-Moore-Signs-Executive-Order-to-Maximize-Economic-Potential-for-Neighborhoods-in-Baltimore-City.aspx)

<sup>27</sup> [Will the Harm from Baltimore's Highway to Nowhere Ever Be Repaired? \(baltimoremagazine.com\)](https://www.baltimoremagazine.com/content/view/full/12111).

The Red Line Light Rail Project launched in 2014 and signaled a significant step towards reparation and integration; however, the project was halted by then Governor Larry Hogan in 2015. Hogan sent back \$900 million to the federal government to block the project and shifted \$736 million in State funds to suburban and rural highway construction.

The Johns Hopkins Transit Equity Report from 2021 analyzed Baltimore's gaps in transit for Communities of Color and identified specific geographic locations with greatest need for connection. Those locations are consistent with communities who would be impacted by the Red Line, which is proposed to connect west Baltimore (east Baltimore County) with east Baltimore City.

Neighborhood Access and Equity Grants from the federal Inflation Reduction Act might be used to raze the Highway to Nowhere and build a new light rail line connecting east and west Baltimore. The new federal funding opportunity creates new possibility around the proposed Red Line, which would bring improved access to jobs, groceries and education opportunities for thousands of residents on the west side of Baltimore.

## Digital Disconnection

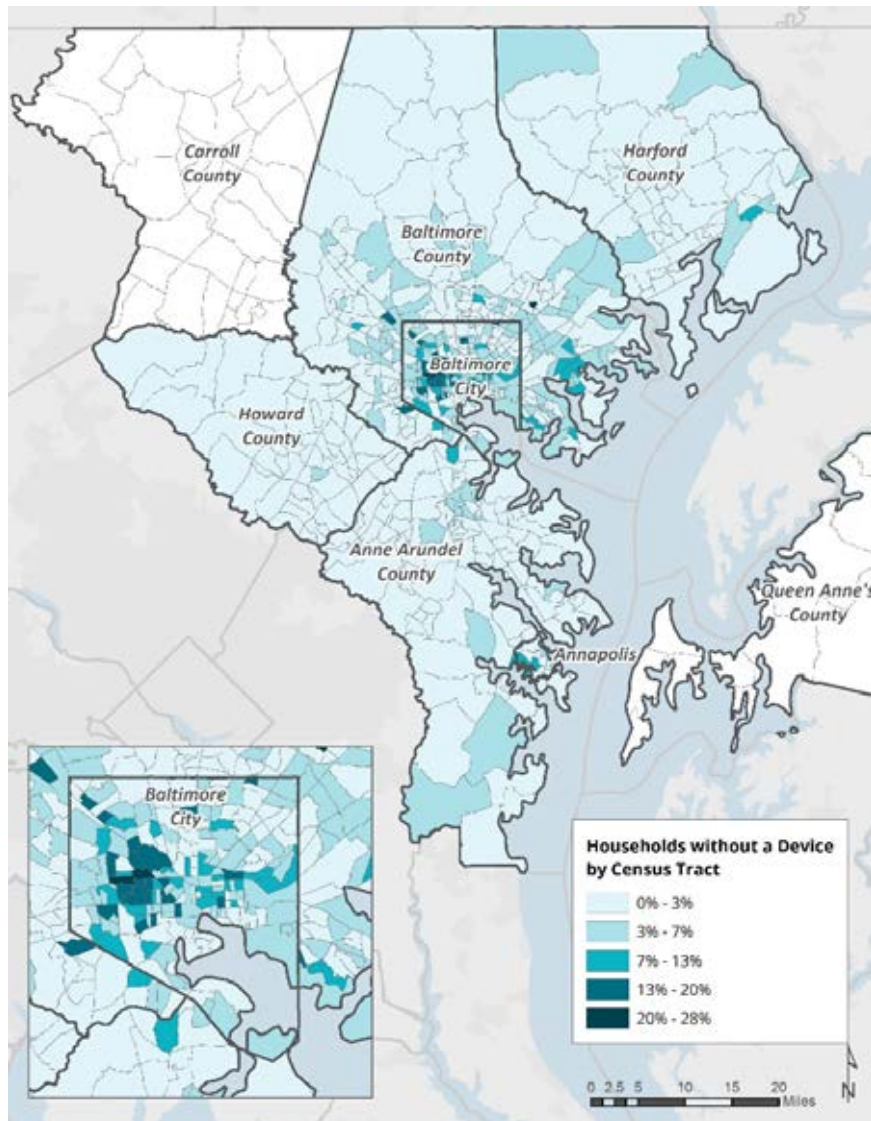
In addition to geographic connection, reliable and fast internet accessibility and access to a laptop is a requirement for equitable access to educational resources, job seeking, entrepreneurial projects, learning new skills and general connectivity to the world at large. It is also critical in attracting new investment and businesses into communities. This is especially true in communities that do not have access to postsecondary education and in communities that seek to grow or strengthen their economic base. The Brookings Institution estimated in 2016 that two thirds of new jobs require digital skills leaving those on the wrong side of the digital divide with access to fewer resources, and less opportunities in education and the job market.<sup>28</sup>

The figures below show the percentage of households without any type of device (laptop, smartphone, table) and households without a broadband subscription.

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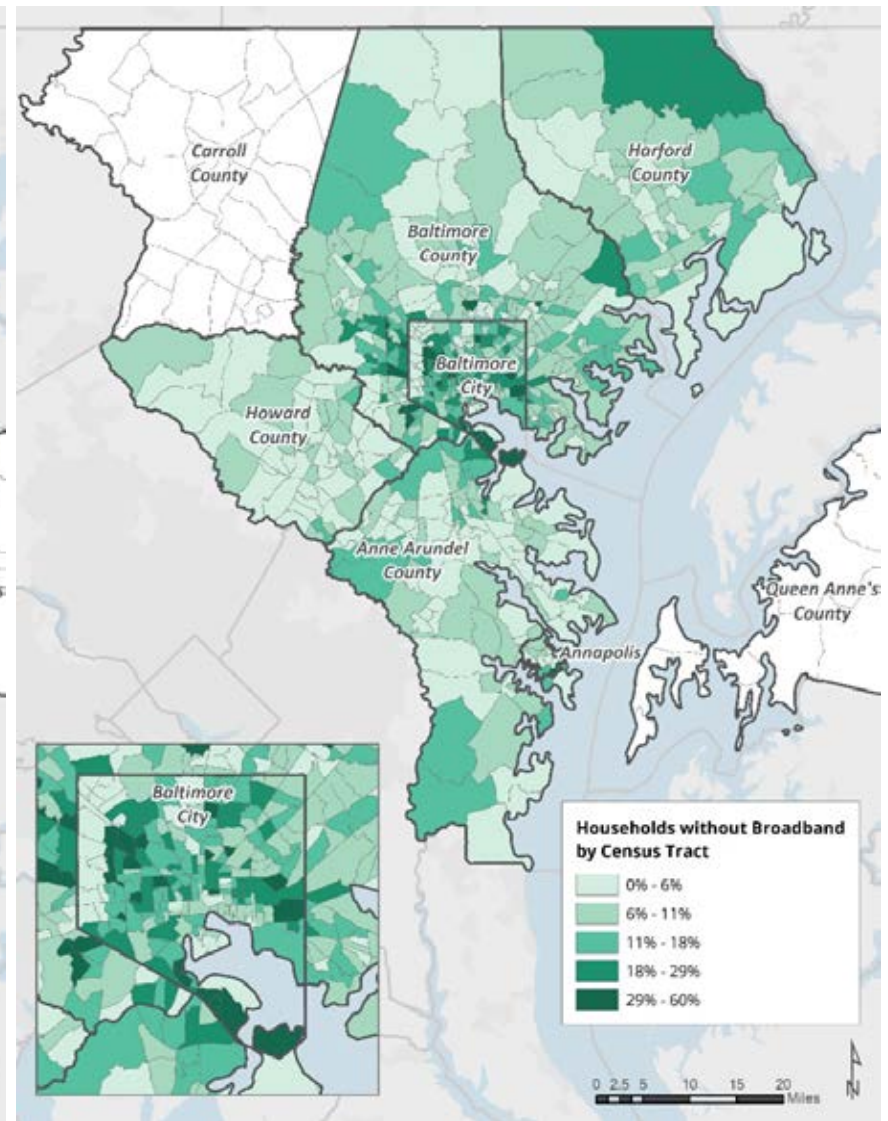
<sup>28</sup> Mark Muro, Sifan Liu, Jacob Whiton and Siddharth Kulkarni, "Digitalization and the American Workforce," *Brookings Institute*, November 2017, [www.brookings.edu/wp-content/uploads/2017/11/mpp\\_2017nov15\\_digitalization\\_full\\_report.pdf](http://www.brookings.edu/wp-content/uploads/2017/11/mpp_2017nov15_digitalization_full_report.pdf)

**Figure IV-52.**  
Households without a Device by Census Tract



Note: Computer ownership includes desktop, laptop, smartphone or tablet.  
Source: 2023 1-year American Community Survey.

**Figure IV-53.**  
Households without Broadband by Census Tract



Source: 2023 1-year American Community Survey.



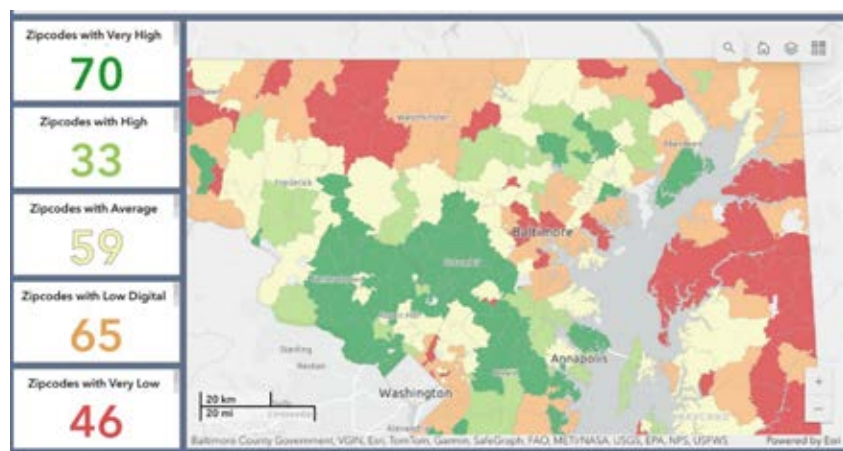
The Maryland Digital Equity Scorecard is an index made up of three indicators pertaining to digital connectivity. It was created in an effort to develop a measure of digital equity in Maryland at the 5-digit zip code level.<sup>29</sup> The three indicators are:

1. Whether a household has a wireline internet subscription at home
2. Whether a household is reliant only on a cellular data plan for online connectivity at home
3. Whether a household has either zero or just one computing device for internet access.

Although the scorecard data is slightly dated from the 2016-2020 American Community Survey and does not account for likely post Covid era improvements in access, considerable differences across communities are apparent as shown in the figure below. Notably, digital access is lowest in both rural areas and inner-city Baltimore communities both with very low access and low access extends beyond the City of Baltimore into more suburban areas of Anne Arundel and Baltimore Counties.

**Figure IV-54.**  
**Baltimore Region**  
**Digital Access by**  
**Zip Code**

Source: Abell Foundation and American Community Survey, 2016-2020 estimates.



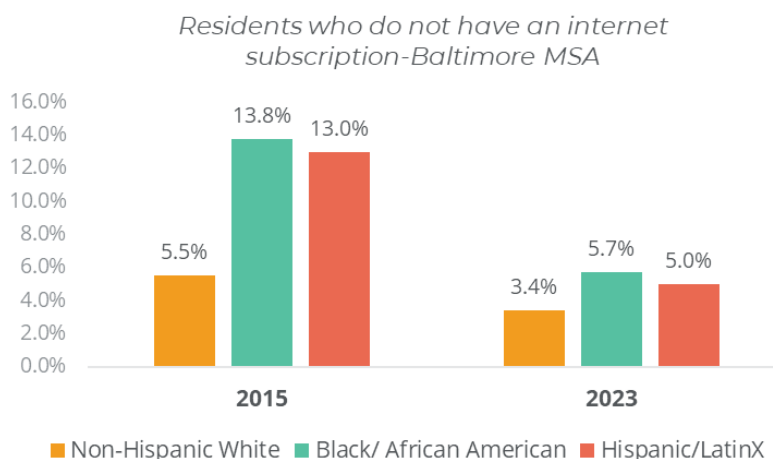
The figures below indicate that although disproportionate access to internet still exists, considerable progress (as defined by internet subscription) has been made since 2018 for Black/African American residents. The estimates also reveal a persistent gap for Hispanic households particularly when isolating the City of Baltimore from the greater Baltimore Metropolitan Statistical Area. Small populations and large margins of error for county-level data prevents isolating statistics by suburban county.

<sup>29</sup> [Digital Inclusion \(communitydevelopmentmd.org\)](https://communitydevelopmentmd.org/)

**Figure IV-55.**  
**Internet**  
**Subscription Over**  
**Time by Race,**  
**Baltimore MSA**

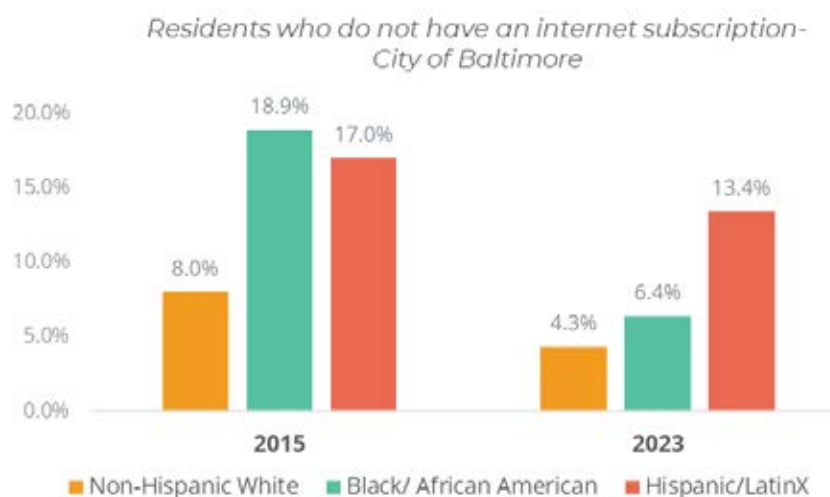
Note: Baltimore-Columbia-Townsend Metropolitan Statistical Area.

Source: American Community Survey 2018 1 year estimates, and 2023 1 year estimates.



**Figure IV-56.**  
**Internet**  
**Subscription Over**  
**Time by Race,**  
**Baltimore City**

Source: American Community Survey 2018 1 year estimates, and 2023 1 year estimates.



## Mapping Overall Opportunity

Mapping provides a method of viewing many of the opportunity indicators analyzed in this section in aggregate. Two sets of maps are frequently used to assess and measure opportunity in the Baltimore region: one created by stakeholders in the region for fair housing assessments, and the other used by the state to help determine allocation of Low Income Housing Tax Credits.

The 2014 Regional Housing Plan included the development of a set of opportunity indicators customized to the Baltimore region—which would eventually become a “composite” map of opportunity indicators. That map was used to analyze access to opportunity in both the 2014 and 2020 AIs.

To update our understanding of the geography of socioeconomic opportunity across the Baltimore Region, the Baltimore Regional Fair Housing Group hired the Baltimore Regional Housing Partnership (BRHP) to adapt its opportunity map for this study. That map creates

an updated composite opportunity score from the opportunity indicators listed in the table below for each Census tract in the region. For the purpose of this report’s analysis, Census tracts have been classified by the quintile of their opportunity scores: the lowest-scoring 20% of tracts by are “very low opportunity” tracts, the median 20% of tracts by opportunity score are “moderate opportunity” tracts, and the highest-scoring 20% of tracts are “very high opportunity” tracts.

**Figure IV-57.**  
**Opportunity Indicators Summarized by Opportunity Quintiles, 2024**

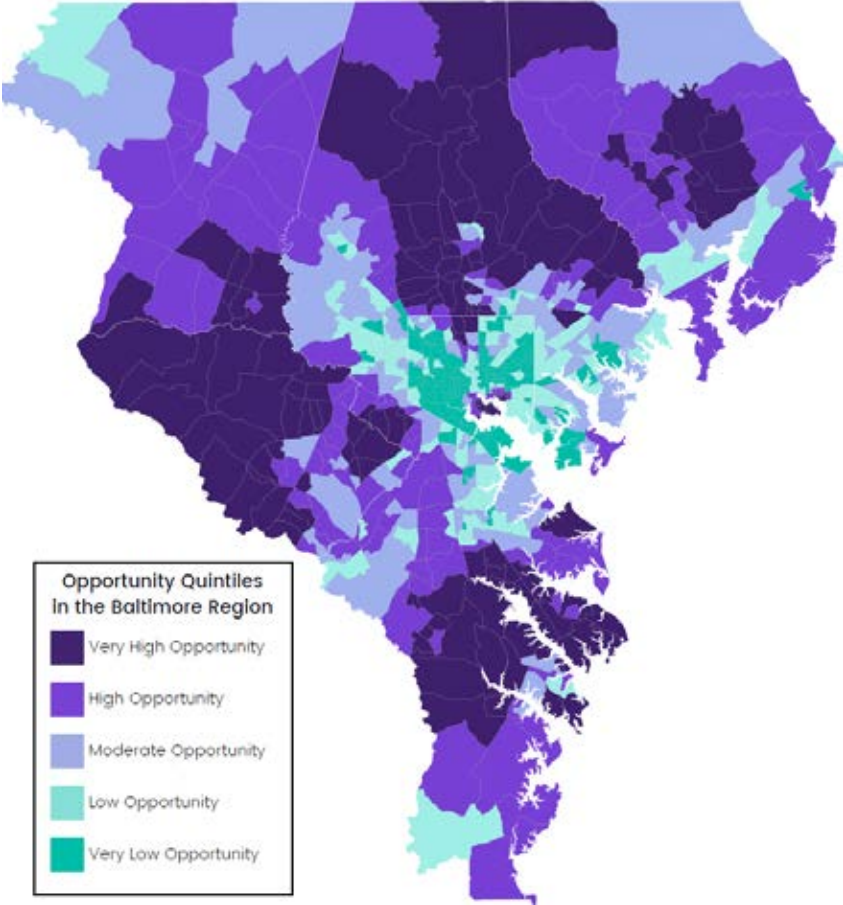
Educational Opportunity	Community Strength	Economic Opportunity
Share College Educated	Single Parent Share of Households	Unemployment Rate
Share with High School Degree	Poverty Rate	Mean Commute Time
Share Proficient English	Median Household Income	High-Skill Employment
Share Proficient Math	Owner Occupancy Rate	
Student Growth Percentile English	Vacancy Rate	
Student Growth Percentile Math	Median Value of Owner-Occupied Homes	
Modified School Accountability Index	Change in Rental Share of Units	
	Voucher-Assisted Share of Rental Units	
	Voucher-Assisted Share of All Units	
	Racial Disparity in Homeownership	

Note: Each indicator is weighted equally in calculating opportunity scores.

Source: BRHP and BMC.

**Figure IV-58.**  
**Opportunity Map,**  
**Baltimore Region,**  
**2024**

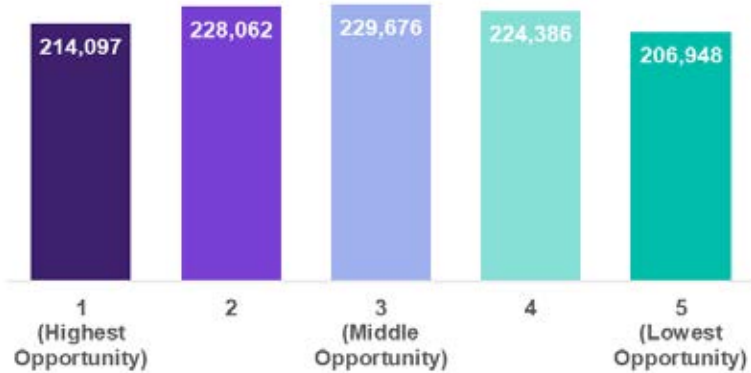
Source:  
BRHP and BMC.



The figure below shows that there is a fairly uniform distribution of housing units across opportunity quintile.

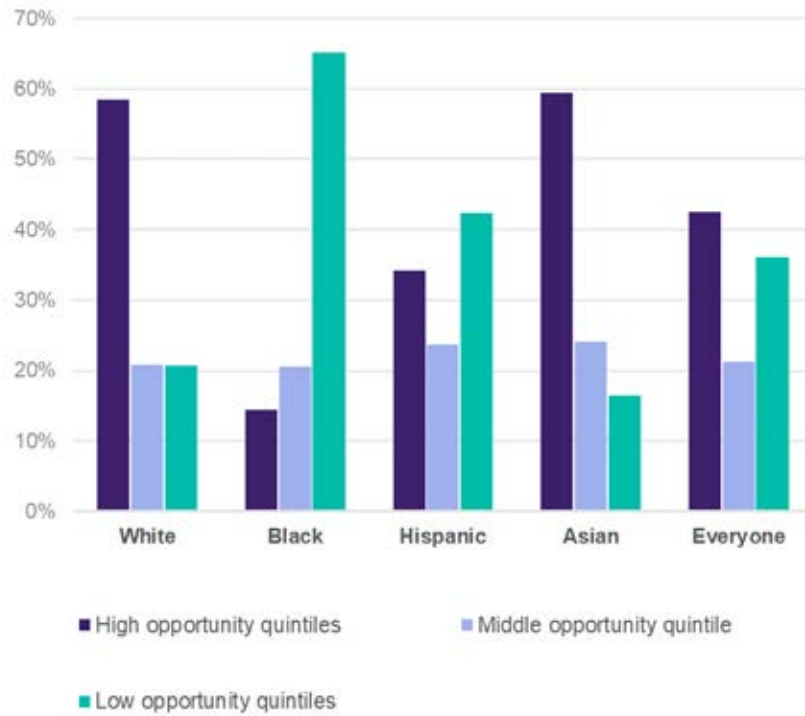
**Figure IV-59.**  
**Housing Units by**  
**Opportunity**  
**Quintile**

Source:  
BMC and Root Policy Research.

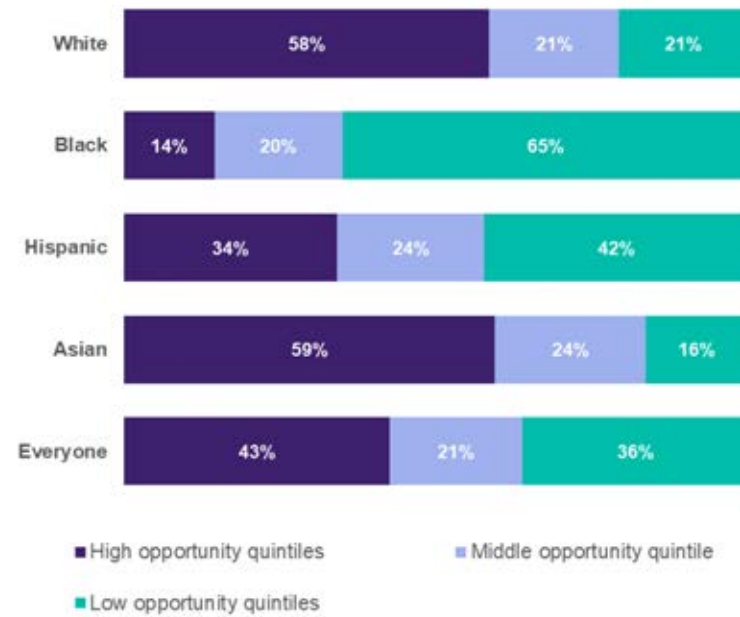


The following figures show the distribution of residents in the region by race and ethnicity and opportunity quintile. These distributions are much less uniform than the distribution of housing units overall, demonstrating the unevenness of housing choice. Asian and White residents are disproportionately likely to be living in areas of high opportunity and Black residents are disproportionately likely to be living in areas of low opportunity.

**Figure IV-60.**  
**Residents by Opportunity Quintile, Race and Ethnicity, Baltimore Region, 2022**



Source: BMC and Root Policy Research.

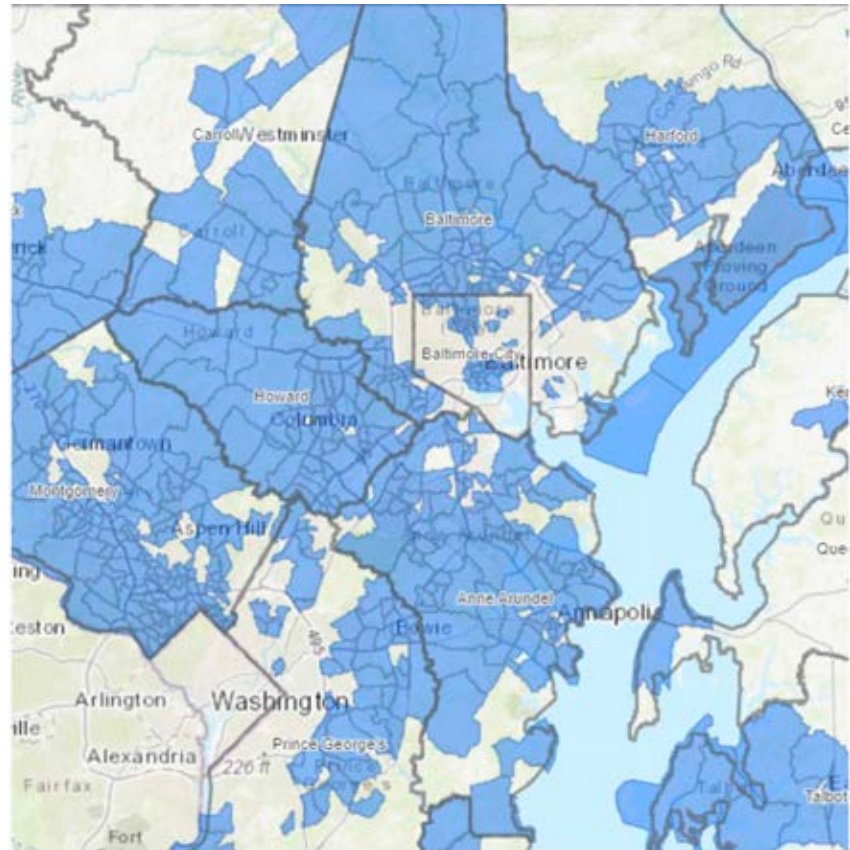


Source: BMC and Root Policy Research.

The state map, developed by the Department of Housing and Community Development (DHCD), does not include any K-12 school performance indicators—and is a statewide map.

**Figure IV-61.  
Maryland DHCD  
Opportunity Map**

Source:  
Maryland DHCD.



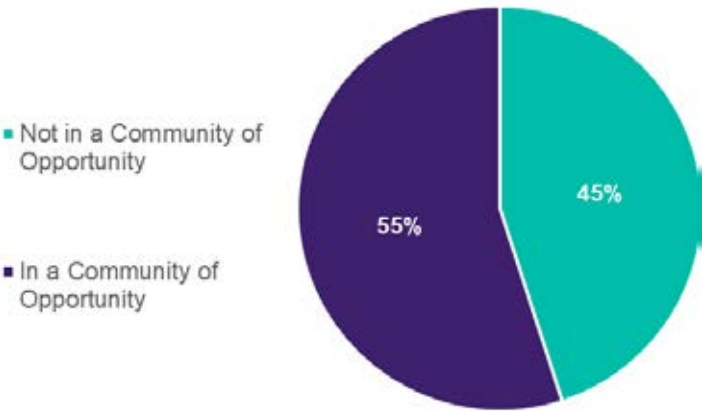
The indicators used in the DHCD map include:

- Community Health:
  - Median Household Income
  - Owner Occupancy Rate
  - Median Value of Owner-occupied Homes
  - Population growth 2010-2020
  - Poverty rate
  - Vacancy rate
- Economic opportunity:
  - Unemployment rate
  - Mean commute time
- Educational opportunity:
  - Share with some college or associate's degree;
  - Share with some high school but no diploma.



More than half of the homes in the Baltimore metropolitan area are in Communities of Opportunity, as designated by Maryland DHCD:

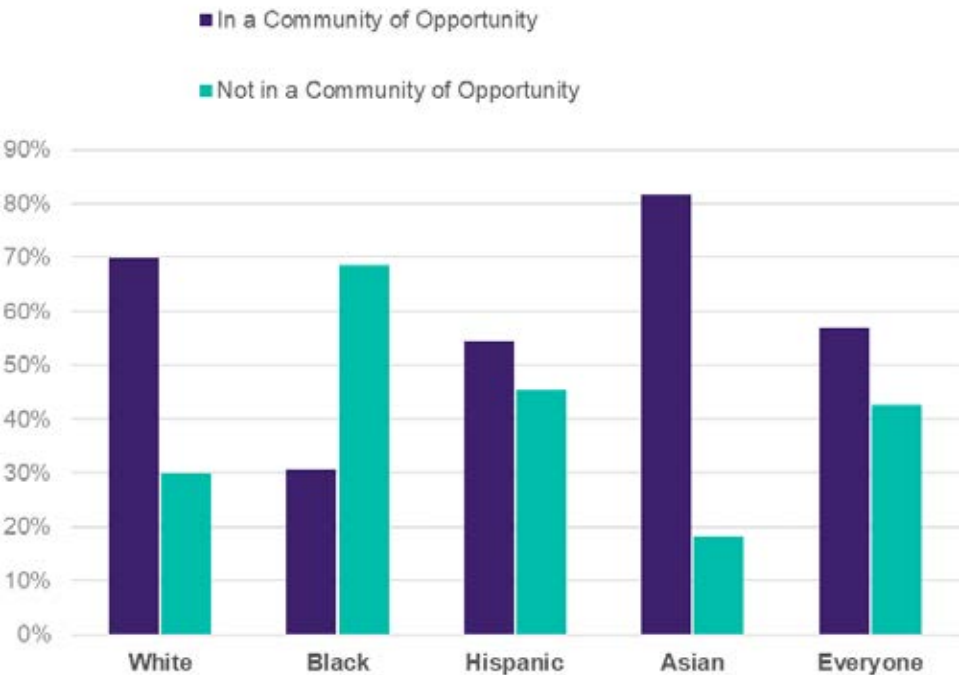
**Figure IV-62.**  
**Housing Units by**  
**Maryland DHCD**  
**Opportunity**  
**Designation**



Source:  
Maryland DHCD and Root Policy  
Research.

Similar to the graphs accompanying the quintile opportunity map above, Maryland DHCD's opportunity map also shows Black residents as living the most disproportionately outside of Communities of Opportunity.

**Figure IV-63.**  
**Residents by Maryland DHCD Opportunity Designation, Race and Ethnicity,**  
**Baltimore Region, 2022**



Source: Maryland DHCD and Root Policy Research

## SECTION V.

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### DISPROPORTIONATE HOUSING NEEDS

## SECTION V.

# Disproportionate Housing Needs

The primary purpose of a disproportionate housing needs analysis is to determine how access to the housing market and housing choice differ for members of classes of people protected from discrimination under the Fair Housing Act. Programs and policies that are neutral on their face can nonetheless disparately impact certain protected classes. A disparate impact exists when a government policy with a legitimate, non-discriminatory goal, regardless of intent, has a harmful effect on a class protected by the Fair Housing Act, and another policy that has less of that effect is available.

Disproportionate needs analyses can also identify where gaps in housing markets exist for all residents and facilitate goal-setting and strategic housing planning.

This section updates the 2020 Analysis of Impediments to Fair Housing Choice (AI) in the Baltimore Region, which also responded to the following questions:

- a) Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems when compared to other groups for the jurisdiction and region?*
- b) Which areas in the jurisdiction and region experience the greatest housing burdens?*
- c) Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock for the jurisdiction and the region.*
- d) Describe differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.*

### Primary Findings

- There were 1,112,511 housing units in the Baltimore region as of 2022, representing a net gain of 36,436 units since 2017—an increase of only 3%. Housing unit production grew slower than overall household growth between 2017 and 2022 (6%), which has led to a constrained supply, lower vacancy rates, and higher housing costs. Average rent for multifamily units in the Baltimore region has increased by 21% in the past five years and by 49% in the past fifteen years; for sale home prices have increased by 76% over 20 years.
- Single family detached homes made up most of the new units (21,454 new single family detached homes were built between 2017 and 2022). Most of this increase

occurred in Baltimore County, which added 14,967 of these units. The region gained 18,969 units in large multifamily complexes, with almost half of those built in Baltimore City.

- Publicly assisted rental inventory meaningfully lowers median rents for multifamily units in the Baltimore region. Still, the price distribution of the Baltimore region's multifamily rental units does not align with what households in the region can afford. Fifteen percent of the region's households earn less than 30% AMI, while only 3% of multifamily units are priced affordably for them without the use of tenant-based vouchers. This mismatch disproportionately affects African American households, 23% of whom earn less than 30% AMI. Mismatches are especially severe in Anne Arundel and Howard Counties, where the shares of households earning 0-30% AMI *and* 31-50% AMI outweigh the shares of multifamily units affordable in these price ranges.
- Although the supply of affordable housing in the counties has improved since 2010, Baltimore City continues to provide a much larger share of affordable rental housing, including publicly supported housing, than its share of all rental units: Baltimore City provides 69% of deeply affordable rentals compared to 37% of the region's renter households, and this has changed little since 2017 (67% of deeply affordable units v. 38% of renter households).
- Relative to the distribution of its households by income level, the region undersupplies owner-occupied homes affordable to households earning less than 80% AMI. Jurisdictional variation in homeownership affordability is partially attributable to jurisdictional differences in zoning. Baltimore City—which contains nearly 70% of the region's land zoned for high density housing and has an owner-occupied housing stock comprised mostly of attached units—undersupplies owner-occupied homes affordable to households earning less than 50% AMI. Anne Arundel and Howard Counties—which together contain about three quarters of the region's land zoned for very low density housing and each have owner-occupied housing stocks comprised mostly of single family detached units—undersupply owner-occupied homes affordable to households earning less than 120% AMI. In the region and in each jurisdiction, African American households are most likely to earn incomes affected by shortages in affordable owner-occupied homes.
- African American and Hispanic residents in the region have significantly lower rates of ownership than Non-Hispanic White and Asian households. These differences are due to a number of factors including decades of discrimination preventing the wealth building necessary to afford a down payment and establish a credit history; historically lower levels of employment; possible discrimination in loan pricing; and geographic bias in property valuations. An analysis of 2022-2023 mortgage lending data shows that African American applicants and Hispanic applicants were denied home purchase loans at over twice the rate of Non-Hispanic White applicants. African American and

Hispanic residents face disproportionately high mortgage denial rates across jurisdictions, age groups, loan purposes, and applicant income levels.

## Housing Market Trends

**Housing units.** Figure V-1 shows changes in the total number of housing units and housing units by type in the Baltimore region overall and by jurisdiction. There were 1,112,511 housing units in the Baltimore region as of 2022, representing a net gain of 36,436 units since 2017—an increase of only 3%.

In interpreting this table, it is important to note that the U.S. Census Bureau made temporary changes in unit classification in the 2020 Census that can distort changes in units by type in future ACS data. In the table below, this seems most pronounced for Baltimore City: the 2022 data may be overrepresenting the number of single family detached units and underrepresenting attached, plex, and small multifamily units. With these limitations in mind, residential permitting trends offer an alternative understanding of recent changes to the region's housing stock by jurisdiction.

By jurisdiction,

- All jurisdictions except for Baltimore City experienced net gains in housing units overall and increased their total housing stock by 4-6% between 2017 and 2022:
  - Baltimore County saw a net gain of 14,250 units, with the greatest net growth in single family detached units;
  - Anne Arundel County saw a net gain of 11,397 units, the greatest shares of which are single family attached units and units in multifamily developments of five or more units;
  - Howard County gained 5,975 units, mostly in multifamily developments of five or more units;
  - Harford County gained 4,931 units on net, the majority of which are single family detached homes; and
  - Annapolis gained 1,042 units with net gains taking place almost exclusively in single family units.
- Baltimore City lost 655 housing units overall—a loss of around 0.2% of its total housing stock—between 2017 and 2022. This reflects the city's strategy to repurpose vacant and underutilized properties,<sup>1</sup> and also the 2021 demolition of the aging Perkins Homes public housing complex, but not the larger number of homes slated to replace

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<sup>1</sup> According to Baltimore City and DHCD data, in August 2024, 13,210 buildings in the city currently have Vacant Building Notices (VBNs; code violations placed on a property when it is vacant, abandoned, and uninhabitable), down from over 16,000 buildings from 2016 to 2020.

it through HUD's Choice Neighborhoods program. Those new homes had not been completed by 2022.

Changes in the composition of the region's housing stock were most significant in single family detached homes and units in large multifamily complexes. Specifically, between 2017 and 2022,

- The region gained 21,454 single family detached homes. Most of this increase occurred in Baltimore County, which added 14,967 of these units, while all other jurisdictions except for Anne Arundel County saw gains in single family detached units. Single family homes constituted 43% of the region's housing stock in 2022.
- The region gained 18,969 units in large multifamily complexes. Units in large multifamily complexes increased in all jurisdictions except for Annapolis, where there are five fewer of these units in 2022 than in 2017. Almost half of the large multifamily units added in the region are located in Baltimore City. Anne Arundel and Howard Counties contributed the next largest shares of the region's new units in large multifamily developments, adding 4,390 and 2,967 large multifamily units respectively.
- The numbers of units in small multifamily developments and boats, RVs, and vans used as housing units in the region remained stable, changing by fewer than 300 units each.
- The region lost 2,108 single family attached units. Losses were also seen in duplexes, triplexes, and fourplexes (-1,114 units) and mobile homes (-1,041 units). Losses in single family attached units and duplexes, triplexes, and fourplexes were most significant in Baltimore City, likely due to the City's vacants to value program.



**Figure V-1.**  
**Change in Housing Units and by Unit Type, Baltimore Region and**  
**Jurisdictions, 2017-2022**

	2017	2022	# Change 2017-2022	% Change 2017-2022
<b>Baltimore Region</b>	1,076,073	1,112,511	36,438	3%
Single Family Detached	451,455	472,909	21,454	5%
Single Family Attached	334,451	332,343	-2,108	-1%
Duplexes, Triplexes, Fourplexes	48,230	47,116	-1,114	-2%
Small Multifamily (5-19 units)	143,696	143,988	292	0%
Large Multifamily (20+ units)	86,198	105,167	18,969	22%
Mobile home	11,836	10,795	-1,041	-9%
Boat, RV, van, etc.	207	193	-14	-7%
<b>Anne Arundel County</b>	224,549	236,486	11,937	5%
Single Family Detached	138,152	137,064	-1,088	-1%
Single Family Attached	44,191	50,861	6,670	15%
Duplexes, Triplexes, Fourplexes	4,379	3,921	-458	-10%
Small Multifamily (5-19 units)	22,024	25,439	3,415	16%
Large Multifamily (20+ units)	11,281	15,671	4,390	39%
Mobile home	4,445	3,530	-915	-21%
Boat, RV, van, etc.	77	0	-77	-100%
<b>Baltimore County</b>	336,873	351,123	14,250	4%
Single Family Detached	153,228	168,195	14,967	10%
Single Family Attached	83,347	80,031	-3,316	-4%
Duplexes, Triplexes, Fourplexes	9,603	12,144	2,541	26%
Small Multifamily (5-19 units)	61,023	59,288	-1,735	-3%
Large Multifamily (20+ units)	26,817	28,638	1,821	7%
Mobile home	2,796	2,749	-47	-2%
Boat, RV, van, etc.	59	78	19	32%
<b>Harford County</b>	100,274	105,205	4,931	5%
Single Family Detached	58,422	61,459	3,037	5%
Single Family Attached	21,657	22,972	1,315	6%
Duplexes, Triplexes, Fourplexes	2,423	2,325	-98	-4%
Small Multifamily (5-19 units)	11,114	11,853	739	7%
Large Multifamily (20+ units)	3,061	3,487	426	14%
Mobile home	3,597	3,059	-538	-15%
Boat, RV, van, etc.	0	50	50	-

Source: 2017 and 2022 5-year ACS (Annapolis) and 1-year ACS (region and all other jurisdictions).

**Figure V-1.**  
**Change in Housing Units and by Unit Type, Baltimore Region and**  
**Jurisdictions, 2017-2022 Continued**

	2017	2022	# Change 2017-2022	% Change 2017-2022
<b>Howard County</b>	119,843	125,818	5,975	5%
Single Family Detached	62,530	64,065	1,535	2%
Single Family Attached	26,676	25,975	-701	-3%
Duplexes, Triplexes, Fourplexes	1,668	2,883	1,215	73%
Small Multifamily (5-19 units)	20,645	21,556	911	4%
Large Multifamily (20+ units)	7,485	10,452	2,967	40%
Mobile home	794	887	93	12%
Boat, RV, van, etc.	45	0	-45	-100%
<b>Baltimore City</b>	294,534	293,879	-655	0%
Single Family Detached	39,123	42,126	3,003	8%
Single Family Attached	158,580	152,504	-6,076	-4%
Duplexes, Triplexes, Fourplexes	30,157	25,843	-4,314	-14%
Small Multifamily (5-19 units)	28,890	25,852	-3,038	-11%
Large Multifamily (20+ units)	37,554	46,919	9,365	25%
Mobile home	204	570	366	179%
Boat, RV, van, etc.	26	65	39	150%
<b>Annapolis</b>	17,358	18,400	1,042	6%
Single Family Detached	6,436	7,056	620	10%
Single Family Attached	3,918	4,684	766	20%
Duplexes, Triplexes, Fourplexes	1,021	908	-113	-11%
Small Multifamily (5-19 units)	3,834	3,597	-237	-6%
Large Multifamily (20+ units)	2,149	2,144	-5	0%
Mobile home	0	0	0	-
Boat, RV, van, etc.	0	11	11	-

Source: 2017 and 2022 5-year ACS (Annapolis) and 1-year ACS (region and all other jurisdictions).

Figure V-2 compares growth in housing units to growth in households between 2017 and 2022. The number of households in the region increased by 6% between 2017 and 2022, outpacing growth in housing units (+3%). This resulted in a decrease in the ratio of housing units to households from 1.12 to 1.10 at the regional level. Similar changes occurred in each jurisdiction, with the greatest reduction in units to households ratio occurring in Baltimore City: the city had 1.23 housing units per household in 2017, and this decreased to 1.19 by 2022.

**Figure V-2.**  
**Change in Households, Baltimore Region and by Jurisdiction, 2017–2022**

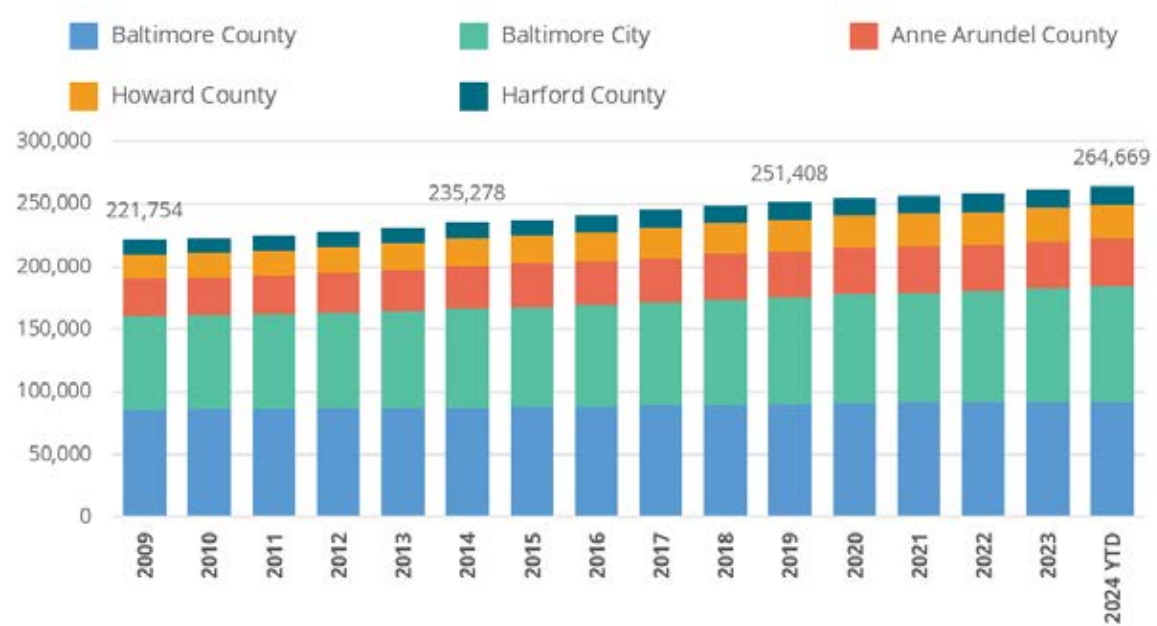
	2017			2022			Change 2017-2022		
	Units	Households	Units:HHs Ratio	Units	Households	Units:HHs Ratio	Units	HHs	Units:HHs Ratio
<b>Baltimore Region</b>	1,076,073	962,277	1.12	1,112,511	1,015,599	1.10	3%	6%	-0.02
<b>Anne Arundel County</b>	224,549	205,395	1.09	236,486	221,704	1.07	5%	8%	-0.03
<b>Baltimore County</b>	336,873	312,859	1.08	351,123	328,611	1.07	4%	5%	-0.01
<b>Harford County</b>	100,274	92,895	1.08	105,205	98,822	1.06	5%	6%	-0.01
<b>Howard County</b>	119,843	111,337	1.08	125,818	119,230	1.06	5%	7%	-0.02
<b>Baltimore City</b>	294,534	239,791	1.23	293,879	247,232	1.19	0%	3%	-0.04
<b>Annapolis</b>	17,358	15,684	1.11	18,400	16,969	1.08	6%	8%	-0.02

Source: 2017 and 2022 5-year ACS (Annapolis) and 1-year ACS (region and all other jurisdictions).

**Rental housing.** This section presents recent changes in the Baltimore region’s multifamily rental supply—specifically, the region’s supply of rental units in apartment buildings or other multifamily developments of five or more units—using data supplied by multifamily market analytics provider CoStar.

**Multifamily rental supply.** Figure V-3 shows changes in the total number of multifamily rental units in the Baltimore region and by jurisdiction in the past 15 years. The region has added nearly 43,000 multifamily units since 2009, to reach a total of 264,669 multifamily units as of 2024. Of the jurisdictions in the Baltimore region, Baltimore County has the greatest number of multifamily units (92,237; 35% of the region’s multifamily units), followed closely by Baltimore City (91,947; 35% of the region’s multifamily units). Smaller shares of the region’s multifamily units are located in Anne Arundel County (14%), Howard County (10%), and Harford County (6%).

**Figure V-3.**  
**Total Multifamily Rental Units by Jurisdiction, Baltimore Region, 2009–2024 YTD**



Note: 2024 YTD data include January-June 2024.

Source: CoStar and Root Policy Research.

Multifamily rental units presented above include both market rate and “designated affordable” units.<sup>2</sup> Figure V-4 shows the shares of total multifamily rental units that are designated affordable. Overall, 22% of multifamily rental units in the Baltimore region are designated affordable—although this varies considerably by jurisdiction. Affordable units constitute up to 46% of multifamily rental units in Annapolis and 35% of those in Baltimore City. Designated affordable units make up the smallest share of total multifamily units in Baltimore County at 10%.

**Figure V-4.**  
**Designated**  
**Affordable Units as**  
**Shares of Total**  
**Multifamily Rental**  
**Units, Baltimore**  
**Region and by**  
**Jurisdiction, 2024**

Source:  
CoStar and Root Policy Research.

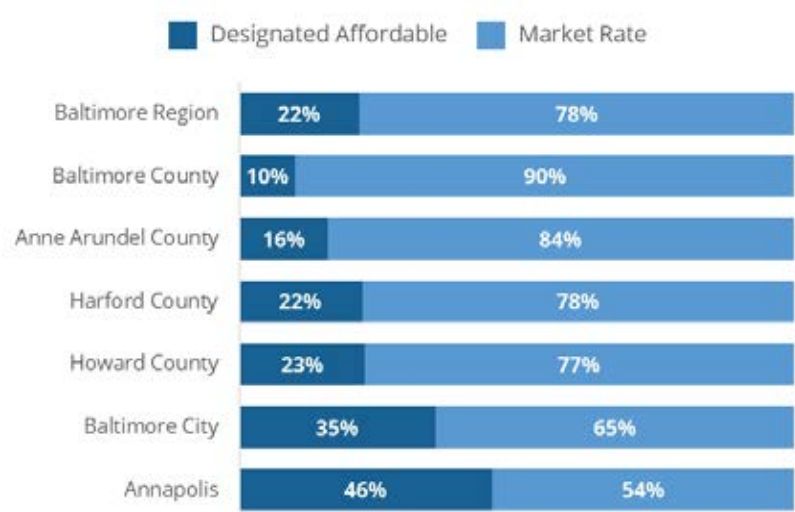
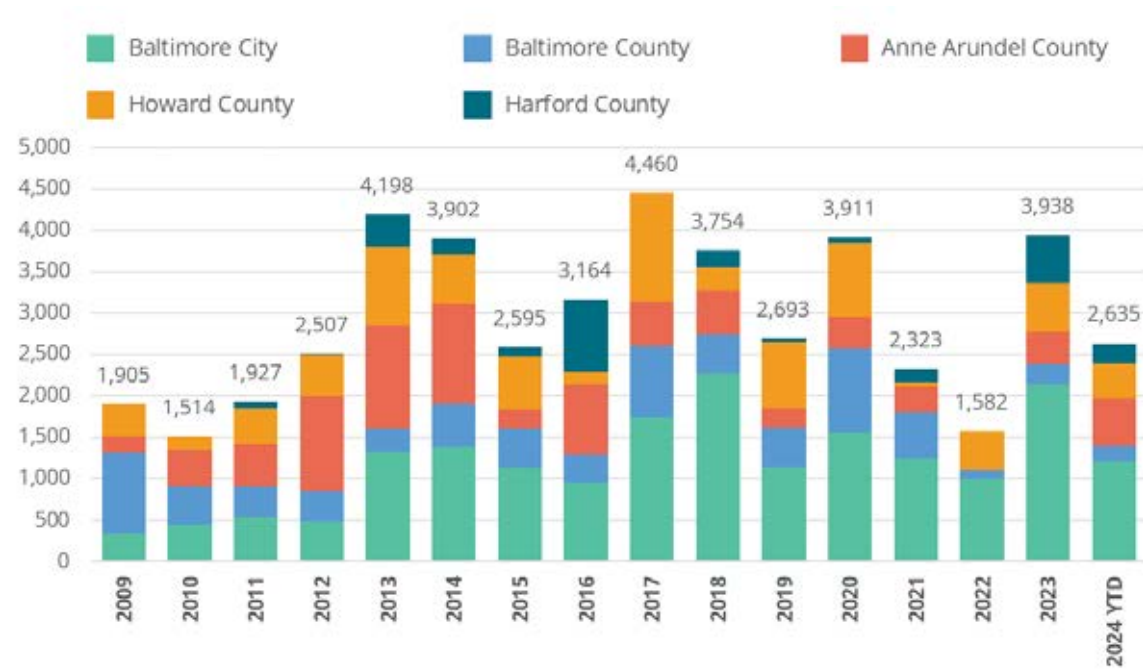


Figure V-5 shows the number of new multifamily housing units delivered in the Baltimore region and its jurisdictions each year, 2009 to 2024 year-to-date. A total of 3,938 new multifamily units were delivered in the Baltimore region in 2023, following trends of 2,323 units delivered in 2021 and 1,582 units delivered in 2022 in the wake of the pandemic. Between 2012 and 2020, the number of multifamily units added to the region ranged between 2,500 and 4,460 units per year. Fewer than 2,000 multifamily units were delivered each year 2009-2011 following the Great Recession.

Baltimore City has led the region’s jurisdictions in multifamily deliveries each year since 2013. Baltimore County had the second greatest share of the region’s multifamily units delivered in 2020 and 2021, but multifamily deliveries in Baltimore County have not returned to pre-pandemic levels—and the share of these units compared to the county’s total multifamily stock is low. Howard County had the second greatest share of the region’s multifamily units delivered in 2022 and 2023.

<sup>2</sup> “Designated affordable” describes all units in developments that CoStar records as “affordable.” These are developments containing units with rents that are discounted or below market rate. This includes, for example, units in properties that receive Low-Income Housing Tax Credits (LIHTC), units with rents subsidized by HUD Section 8 or other federal programs, and units administered by Public Housing Authorities.

**Figure V-5.**  
**Multifamily Rental Units Delivered, Baltimore Region and by Jurisdiction,**  
**2009–2024 YTD**



Note: 2024 YTD data include January-June 2024.

Source: CoStar and Root Policy Research.

Figure V-6 presents the total numbers of multifamily units delivered in the region and by jurisdiction in the past five, 10, and 15 years. A total of 17,082 units have been built in the region in the past five years. The largest numbers of units constructed in the past five, 10, and 15 years are located in Baltimore City. Howard County constructed the second largest number of new multifamily units in the past five and 10 years.

One in five of the region’s new multifamily units (those built in the past five years) is designated affordable. Affordable units constitute the greatest shares of new units in Annapolis at 92%<sup>3</sup> and in Howard County at 37%. Affordable units constitute the smallest shares of new construction in Baltimore County at 5% and in Anne Arundel County at 2%.

<sup>3</sup> Note that only two developments have been built in Annapolis in the past 5 years, the larger of which is affordable.



**Figure V-6.  
Multifamily Units  
Completed in the  
Past 5, 10, and 15  
Years by  
Affordability  
Status, Baltimore  
Region and by  
Jurisdiction, 2024  
YTD**

Note:

2024 YTD data include January-June 2024.

Source:

CoStar and Root Policy Research.

	Designated Affordable Units	Market Rate Units	Total Units
<b>Completed in the past 5 years (2019-2024 YTD)</b>			
<b>Baltimore Region</b>	<b>3,459</b>	<b>13,623</b>	<b>17,082</b>
<b>Anne Arundel County</b>	42	1,881	1,923
<b>Baltimore City</b>	1,881	6,430	8,311
<b>Baltimore County</b>	116	2,434	2,550
<b>Harford County</b>	242	841	1,083
<b>Howard County</b>	1,178	2,037	3,215
<b>Annapolis</b>	42	4	46
<b>Completed in the past 10 years (2014-2024 YTD)</b>			
<b>Baltimore Region</b>	<b>5,302</b>	<b>29,653</b>	<b>34,955</b>
<b>Anne Arundel County</b>	90	5,219	5,309
<b>Baltimore City</b>	2,640	13,144	15,784
<b>Baltimore County</b>	642	4,577	5,219
<b>Harford County</b>	362	2,108	2,470
<b>Howard County</b>	1,568	4,605	6,173
<b>Annapolis</b>	42	15	57
<b>Completed in the past 15 years (2009-2024 YTD)</b>			
<b>Baltimore Region</b>	<b>8,678</b>	<b>38,608</b>	<b>47,006</b>
<b>Anne Arundel County</b>	761	8,095	8,856
<b>Baltimore City</b>	3,692	15,510	18,922
<b>Baltimore County</b>	911	6,761	7,672
<b>Harford County</b>	442	2,511	2,953
<b>Howard County</b>	2,872	5,731	8,603
<b>Annapolis</b>	429	15	444

Figure V-7 shows the distribution of multifamily units built in the past five years by number of bedrooms. The greatest share of new multifamily units (46%) in the region are one-bedroom units. Two-bedroom units account for one third of new units in the region. Studios and three-bedroom units make up smaller shares of new units at 12% and 9% respectively. Only 27 new units—equating to 0.2% of new units—have four bedrooms.

One-bedroom units constitute the greatest shares of new units in all jurisdictions except for Harford County and Annapolis, where the majority of new units have two bedrooms.

**Figure V-7.**  
**Distribution of Multifamily Units Constructed 2019–2024 YTD by Number of Bedrooms, Baltimore Region and by Jurisdiction**

	Total New Units	Studio	1 BR	2 BR	3 BR	4 BR	Unknown
<b>Baltimore Region</b>	<b>17,082</b>	12%	46%	33%	9%	0%	0%
<b>Anne Arundel County</b>	<b>1,923</b>	3%	49%	41%	7%	0%	0%
<b>Baltimore City</b>	<b>8,311</b>	20%	46%	25%	8%	0%	1%
<b>Baltimore County</b>	<b>2,550</b>	6%	47%	39%	7%	0%	0%
<b>Harford County</b>	<b>1,083</b>	0%	37%	54%	10%	0%	0%
<b>Howard County</b>	<b>3,215</b>	6%	45%	37%	12%	0%	0%
<b>Annapolis</b>	<b>46</b>	0%	0%	54%	46%	0%	0%

Note: Data include units completed through June 2024.

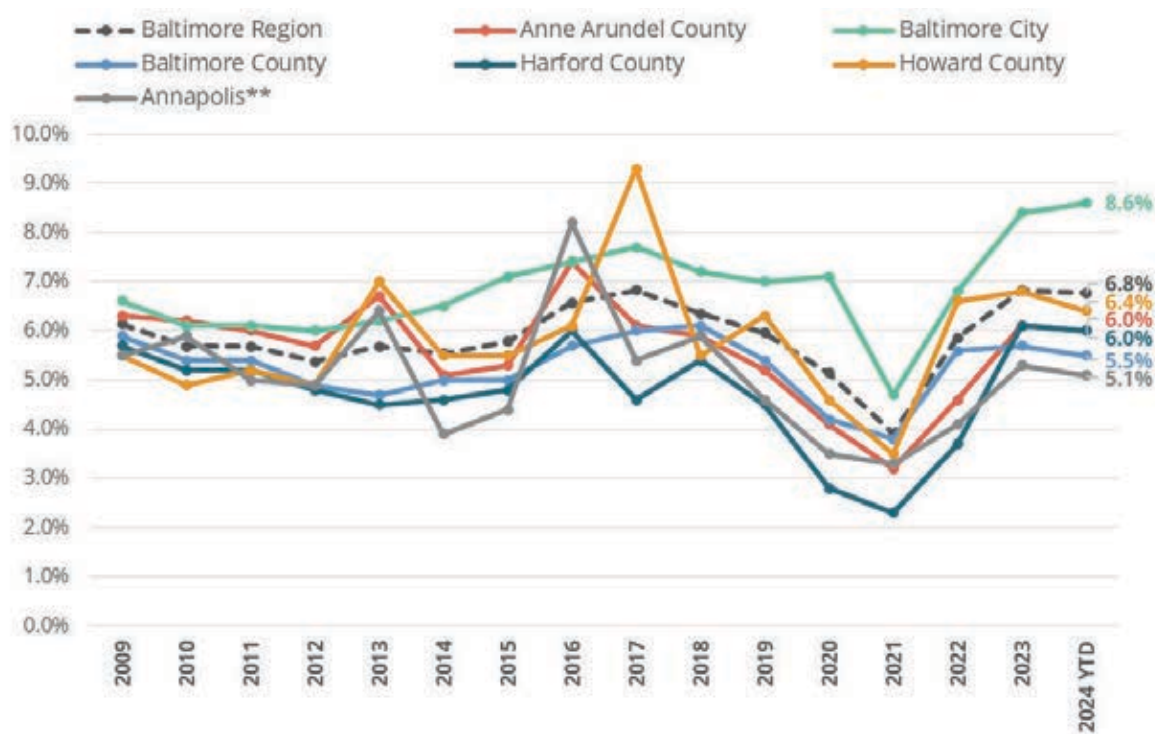
Source: CoStar and Root Policy Research.

Figure V-8 presents trends in multifamily rental vacancy rates from 2009 to 2024. As of June 2024, 6.8% of the Baltimore region's multifamily rental units were vacant. Vacancy is highest in Baltimore City at 8.6%. The city's high multifamily rental vacancy rate partially reflects its relatively high rate of multifamily construction: newly constructed units are considered vacant until they are filled.

All other jurisdictions have lower vacancy rates indicating relatively tighter rental markets, with Annapolis and Baltimore County seeing the lowest vacancy rates in the region at 5.1% and 5.5% respectively.

Historically, vacancy has hovered around 6%, reaching a low of 3.9% in 2021.

**Figure V-8.**  
**Multifamily Rental Vacancy Rate, Baltimore Region and by Jurisdiction,**  
**2009–2024 YTD**



Note: 2024 YTD data are current as of June 2024. Data for Annapolis\*\* may include units in immediately neighboring jurisdictions.

Source: CoStar.

Rental vacancy rates are presented by unit size in Figure V-9. In the region overall, 8.2% of studios, 6.3% of one-bedroom units, 6.5% of two-bedroom units, 6.7% of three-bedroom units, and 5.8% of four-bedroom units are vacant. Vacancy rates are especially low (below 4%) indicating that demand is substantially higher than supply for:

- three- or four-bedroom units in Anne Arundel County,
- three- or four-bedroom units in Harford County, and
- three- or four-bedroom units in Annapolis.

Vacancy rates are especially high (greater than 7%) for:

- studios and one-, two-, and three-bedroom units in Baltimore City,
- four-bedroom units in Baltimore County, and
- three- and four-bedroom units in Howard County.

**Figure V-9.****Vacancy Rate of All Multifamily Rental Units by Number of Bedrooms, Baltimore Region and by Jurisdiction, June 2024**

Vacancy Rate of All Multifamily Units	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	<b>6.8%</b>	8.2%	6.3%	6.5%	6.7%	5.8%
<b>Anne Arundel County</b>	<b>6.0%</b>	5.6%	6.4%	6.0%	3.8%	1.0%
<b>Baltimore City</b>	<b>8.6%</b>	8.7%	7.5%	8.5%	11.0%	6.1%
<b>Baltimore County</b>	<b>5.5%</b>	6.0%	4.9%	5.5%	5.4%	15.6%
<b>Harford County</b>	<b>6.0%</b>	6.1%	5.3%	6.8%	3.6%	0.6%
<b>Howard County</b>	<b>6.4%</b>	6.0%	6.2%	6.0%	8.8%	10.3%
<b>Annapolis</b>	<b>4.2%</b>	6.0%	5.3%	4.6%	1.9%	1.1%

Note: Vacancy for Annapolis presented here differs from vacancy for “Annapolis\*\*” presented previously because data presented in this table represent only developments inside the boundaries of Annapolis.

Source: CoStar and Root Policy Research.

Designated affordable rental units have lower vacancy rates than units overall. As shown in Figure V-10, 5.2% of designated affordable units in the Baltimore region are vacant compared to 6.8% of units overall. Markets for designated affordable units are tight (vacancy below 4%) in Baltimore County and Anne Arundel County and extremely tight (vacancy below 3%) in Harford County and Annapolis.

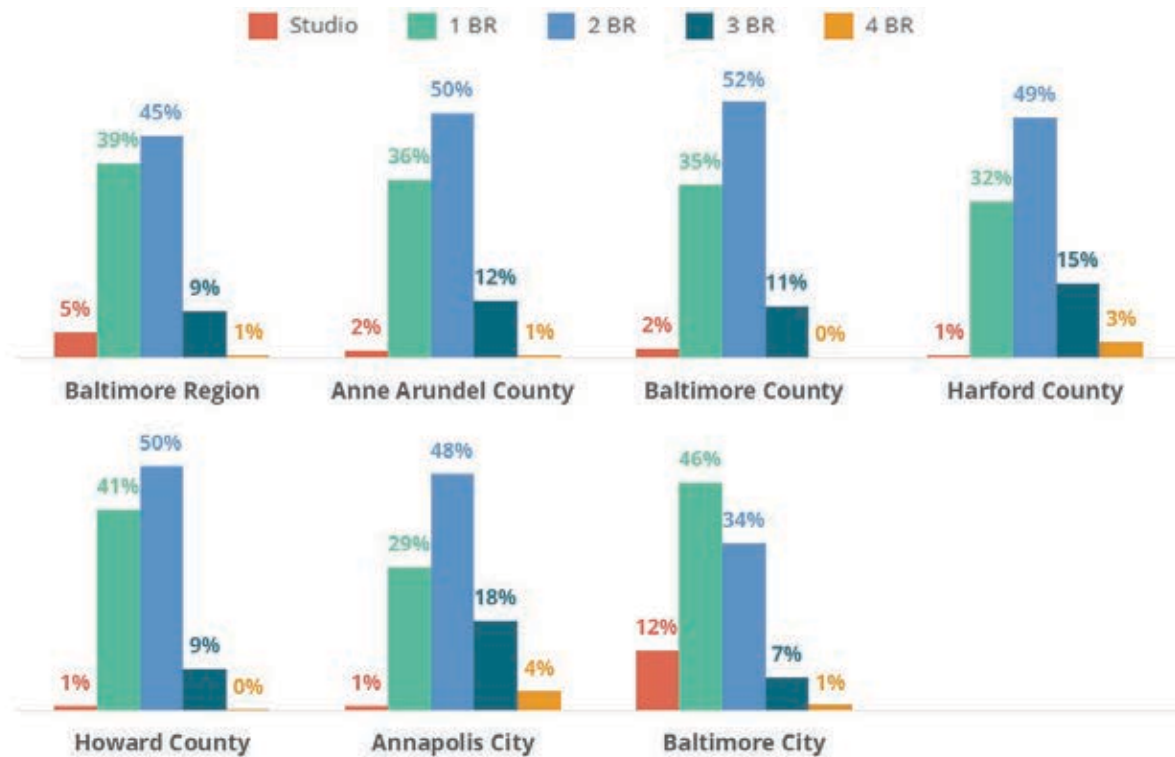
**Figure V-10.****Vacancy Rate of Designated Affordable Multifamily Rental Units by Number of Bedrooms, Baltimore Region and by Jurisdiction, June 2024**

Vacancy Rate of Designated Affordable Units	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	<b>5.2%</b>	7.0%	4.8%	4.9%	6.2%	5.5%
<b>Anne Arundel County</b>	<b>3.2%</b>	3.7%	3.4%	3.7%	1.8%	1.0%
<b>Baltimore City</b>	<b>6.4%</b>	7.2%	6.2%	6.4%	6.1%	6.3%
<b>Baltimore County</b>	<b>3.5%</b>	4.4%	3.1%	4.4%	3.1%	0.0%
<b>Harford County</b>	<b>2.3%</b>	4.0%	2.4%	2.0%	2.9%	14.3%
<b>Howard County</b>	<b>5.0%</b>	3.8%	3.5%	3.8%	15.8%	13.0%
<b>Annapolis</b>	<b>1.9%</b>	4.3%	3.5%	1.9%	1.0%	1.1%

Source: CoStar and Root Policy Research.

Figure V-11 presents the distribution of multifamily rental units by number of bedrooms in the Baltimore region overall and in each jurisdiction. In the Baltimore region and in each jurisdiction except for Baltimore City, the greatest share of multifamily rental units have two bedrooms. Baltimore City’s multifamily units are the smallest in the region on average: 58% of units in Baltimore City have one or fewer bedrooms, compared to 45% in the region overall and a maximum of 42% in other regional jurisdictions. Units are considerably larger elsewhere—especially in Annapolis and Harford County where over two-thirds of units have two, three, or four bedrooms. In the region overall, 55% of units have two, three, or four bedrooms.

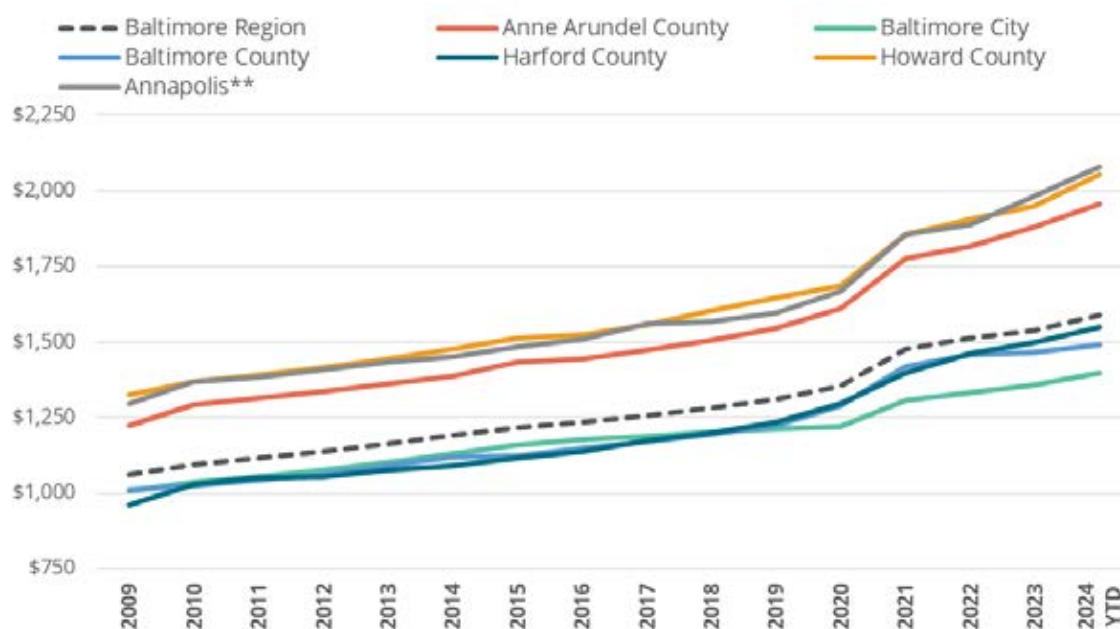
**Figure V-11.**  
**Distribution of Multifamily Rental Units by Number of Bedrooms, Baltimore Region and by Jurisdiction, 2024**



Source: CoStar and Root Policy Research.

**Multifamily rental affordability.** As shown in Figure V-12, average asking rents increased steadily between 2009 and 2020. Rents increased at a greater rate between 2020 and 2021, before returning to a steadier rate of increase in 2021-2024 YTD. Average rent has surpassed \$2,000 in Howard County and Annapolis, and only two jurisdictions—Baltimore City and Baltimore County—have average rents below \$1,500.

**Figure V-12.**  
**Average Asking Rent of Multifamily Units, Baltimore Region and by Jurisdiction, 2009–2024 YTD**



Note: 2024 YTD data are current as of June 2024. Data for Annapolis\*\* may include units in immediately neighboring jurisdictions.  
Source: CoStar.

Figure V-13 shows changes in average rents in the Baltimore region and its jurisdictions across the past five, 10, and 15 years. Average rent grew by 49% in the Baltimore region in the past 15 years, from \$1,063 in 2009 to \$1,587 in 2024 YTD. Average rents increased by at least 60% in Anne Arundel County, Harford County, and Annapolis over the past 15 years, while Baltimore City saw the slowest growth in average rent, relative to other jurisdictions, across this time at +39%.

As discussed above, it is estimated that the Baltimore region increased its number of households by 6% between 2010 and 2022. Growth varied by jurisdiction: between 2010 and 2022, Baltimore City lost 1% of its households, while other jurisdictions increased their numbers of households by 4-5% (in Baltimore County and Annapolis) and 10-14% (in Harford County, Anne Arundel County, and Howard County).

Meanwhile, the supply of multifamily rental units increased by 19% in the region and by 7% in Baltimore County, 13% in Annapolis, 22% in Baltimore City, 24% in Harford County, 27% in Anne Arundel County, and 40% in Howard County. Where increases in supply (as indicated by growth in housing units) outweigh increases in demand (as indicated by growth in households)—as is the case in the Baltimore region and in each jurisdiction studied—it is expected that average rents would decrease or, at most, remain stable. Instead, rents have continued to increase.



**Figure V-13.**  
**Change in Average Asking Rent of Multifamily Units, Baltimore Region and by Jurisdiction, 2009, 2014, and 2024**

	Average Asking Rent				% Growth			
	2009	2014	2019	2024 YTD	2009-2014	2014-2019	2019-2024	2009-2024
<b>Baltimore Region</b>	\$1,063	\$1,193	\$1,311	\$1,587	12%	10%	21%	49%
<b>Anne Arundel County</b>	\$1,224	\$1,387	\$1,547	\$1,957	13%	12%	27%	60%
<b>Baltimore City</b>	\$1,007	\$1,131	\$1,213	\$1,396	12%	7%	15%	39%
<b>Baltimore County</b>	\$1,013	\$1,118	\$1,226	\$1,493	10%	10%	22%	47%
<b>Harford County</b>	\$961	\$1,092	\$1,236	\$1,550	14%	13%	25%	61%
<b>Howard County</b>	\$1,324	\$1,476	\$1,647	\$2,054	11%	12%	25%	55%
<b>Annapolis**</b>	\$1,297	\$1,451	\$1,597	\$2,079	12%	10%	30%	60%

Note: 2024 YTD data are current as of June 2024. Data for Annapolis\*\* may include units in immediately neighboring jurisdictions.

Source: CoStar and Root Policy Research.

Figure V-14 presents the median rents of multifamily units constructed in the past five years by number of bedrooms. Comparing these to median rents of all multifamily units, new and old, presented in Figure V-15, new units rent at a premium. Across the Baltimore region, the median rent of units constructed in the past five years is 38% higher than the median rent of units overall. New units are more expensive than units overall in Baltimore City (by 50%), Baltimore County (by 35%), Anne Arundel County (by 25%), Harford County (by 23%), and Howard County (by 21%).<sup>4</sup>

<sup>4</sup> The median rent for new units in Annapolis is not higher than median rents overall, likely because median rents for new units in Annapolis reflect units in only two new buildings, the larger of which is an affordable development. Median rent for new units in Howard County is slightly lower than the median rent for units overall because four of the county's ten new developments—representing 37% of new units—are designated affordable.

**Figure V-14.**  
**Median Rent of New Multifamily Units by Number of Bedrooms, Baltimore Region and by Jurisdiction, 2024**

Median Rent of New Multifamily Units (Affordable and Market Rate)	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	\$2,054	\$1,598	\$1,973	\$2,535	\$2,468	\$1,460
<b>Anne Arundel County</b>	\$2,450	\$2,025	\$2,294	\$2,822	\$3,582	-
<b>Baltimore City</b>	\$1,889	\$1,346	\$1,914	\$2,402	\$1,889	\$1,460
<b>Baltimore County</b>	\$1,925	\$1,681	\$1,800	\$2,515	\$2,563	\$785
<b>Harford County</b>	\$1,851	-	\$1,628	\$1,853	\$1,684	-
<b>Howard County</b>	\$2,411	\$1,821	\$2,206	\$2,591	\$3,168	\$1,700
<b>Annapolis</b>	\$1,782	-	-	\$1,335	\$1,782	-

Note: "New" units are those constructed within the past five years (2019-2024 YTD). Data include units completed through June 2024. Median rents for new units in Annapolis reflect units in only two new buildings, the larger of which is an affordable development.

Source: CoStar and Root Policy Research.

**Figure V-15.**  
**Median Rent of All Multifamily Units by Number of Bedrooms, Baltimore Region and by Jurisdiction, 2024**

Median Rent of All Multifamily Units (Affordable and Market Rate)	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	\$1,484	\$1,158	\$1,346	\$1,582	\$1,856	\$1,572
<b>Anne Arundel County</b>	\$1,954	\$1,778	\$1,856	\$2,060	\$2,122	\$973
<b>Baltimore City</b>	\$1,258	\$1,110	\$1,193	\$1,326	\$1,504	\$1,383
<b>Baltimore County</b>	\$1,430	\$1,086	\$1,266	\$1,441	\$1,866	\$2,004
<b>Harford County</b>	\$1,500	\$994	\$1,332	\$1,599	\$1,647	\$1,944
<b>Howard County</b>	\$1,991	\$1,821	\$1,791	\$2,114	\$2,622	\$1,700
<b>Annapolis</b>	\$1,948	\$1,778	\$1,778	\$2,090	\$1,538	\$973

Note: Data include units completed through June 2024.

Source: CoStar and Root Policy Research.

Note that the median rents presented above include both market rate and designated affordable units. Figure V-16 presents median rents for market rate units only. This figure demonstrates that the region's designated affordable housing stock meaningfully lowers

median rents across the region. When affordable inventory is excluded and only market rate units are considered, median rents rise by 7% in the region overall; 11% in Baltimore City; 8% in Harford County; 7% in Annapolis; 4% in Anne Arundel and Howard Counties; and 1% in Baltimore County.

**Figure V-16.**  
**Median Rent of Market Rate Multifamily Units by Number of Bedrooms,**  
**Baltimore Region and by Jurisdiction, 2024**

Median Rent of Market Rate Units Only	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
Baltimore Region	\$1,594	\$1,200	\$1,466	\$1,635	\$1,938	\$2,004
Anne Arundel County	\$2,028	\$1,758	\$1,921	\$2,124	\$2,158	\$1,926
Baltimore City	\$1,395	\$1,204	\$1,364	\$1,397	\$1,748	\$1,680
Baltimore County	\$1,450	\$1,062	\$1,316	\$1,463	\$1,866	\$2,004
Harford County	\$1,625	\$994	\$1,437	\$1,693	\$1,659	\$1,944
Howard County	\$2,065	\$1,894	\$1,874	\$2,134	\$2,749	\$3,512
Annapolis	\$2,090	\$1,458	\$1,858	\$2,250	\$2,686	\$3,060

Note: Data include units completed through June 2024.

Source: CoStar and Root Policy Research.

The difference in affordability between new units and units overall is additionally visible in the income levels required to afford median rent, as shown in Figures V-17 and V-18. To afford to rent a median-priced new unit in the Baltimore region, a household needs to earn at least 84% AMI (\$82,152). A median-priced unit of any age is more affordable to households at lower income levels, requiring an income of 61% AMI (\$59,658).

**Figure V-17.**  
**AMI Level Needed to Afford Median Rent of New Multifamily Units by**  
**Number of Bedrooms, Baltimore Region and by Jurisdiction, 2024**

% of AMI Required to Afford Median Rent of New Multifamily Units	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	84%	65%	81%	104%	101%	60%
<b>Anne Arundel County</b>	100%	83%	94%	115%	147%	-
<b>Baltimore City</b>	77%	55%	78%	98%	77%	60%
<b>Baltimore County</b>	79%	69%	74%	103%	105%	32%
<b>Harford County</b>	76%	-	67%	76%	69%	-
<b>Howard County</b>	99%	74%	90%	106%	130%	70%
<b>Annapolis</b>	73%	-	-	55%	73%	-

Note: AMI levels are based on the Baltimore region's 2024 2-person AMI of \$97,800. "New" units are those constructed within the past five years (2019-2024 YTD). Data include units completed through June 2024. Estimates include both market rate and designated affordable units. Median rents for new units in Annapolis reflect units in only two new buildings, the larger of which is an affordable development.

Source: CoStar, HUD AMI Limits, and Root Policy Research.

**Figure V-18.**  
**AMI Level Needed to Afford Median Rent of All Multifamily Units by**  
**Number of Bedrooms, Baltimore Region and by Jurisdiction, 2024**

% of AMI Required to Afford Median Rent of All Multifamily Units	Total Units	Studio	1 BR	2 BR	3 BR	4 BR
<b>Baltimore Region</b>	61%	47%	55%	65%	76%	64%
<b>Anne Arundel County</b>	80%	73%	76%	84%	87%	40%
<b>Baltimore City</b>	51%	45%	49%	54%	62%	57%
<b>Baltimore County</b>	58%	44%	52%	59%	76%	82%
<b>Harford County</b>	61%	41%	54%	65%	67%	80%
<b>Howard County</b>	81%	74%	73%	86%	107%	70%
<b>Annapolis</b>	80%	73%	73%	85%	63%	40%

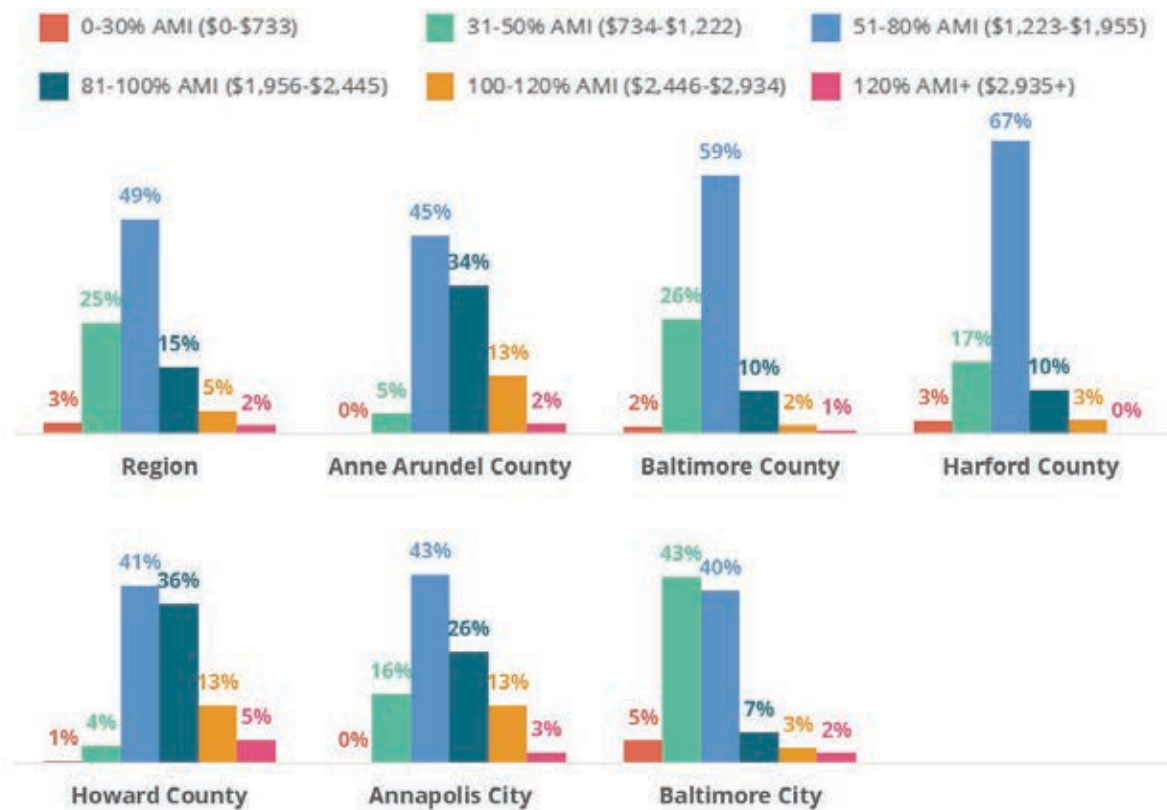
Note: AMI levels are based on the Baltimore region's 2024 2-person AMI of \$97,800. Estimates include both market rate and designated affordable units. Data include units completed through June 2024.

Source: CoStar, HUD AMI Limits, and Root Policy Research.

The distribution of multifamily rental units (including both market rate and affordable units) by AMI affordability level is shown in Figure V-19.

- Only 3% of units in the region rent for amounts affordable to 0-30% AMI households (rents less than \$733).
- 25% of the region's multifamily units are priced between \$733 and \$1,222 per month, affordable to households earning 31-50% AMI.
- Shares of total units affordable on extremely low or very low incomes are greatest in Baltimore City (48%) followed by Baltimore County (28%). Rental units are least affordable to extremely low and very low income households in Anne Arundel and Howard Counties: only 5% of units in these counties are affordable below 50% AMI.

**Figure V-19.**  
**Distribution of Multifamily Rental Units by AMI Affordability Level,**  
**Baltimore Region and by Jurisdiction, 2024**

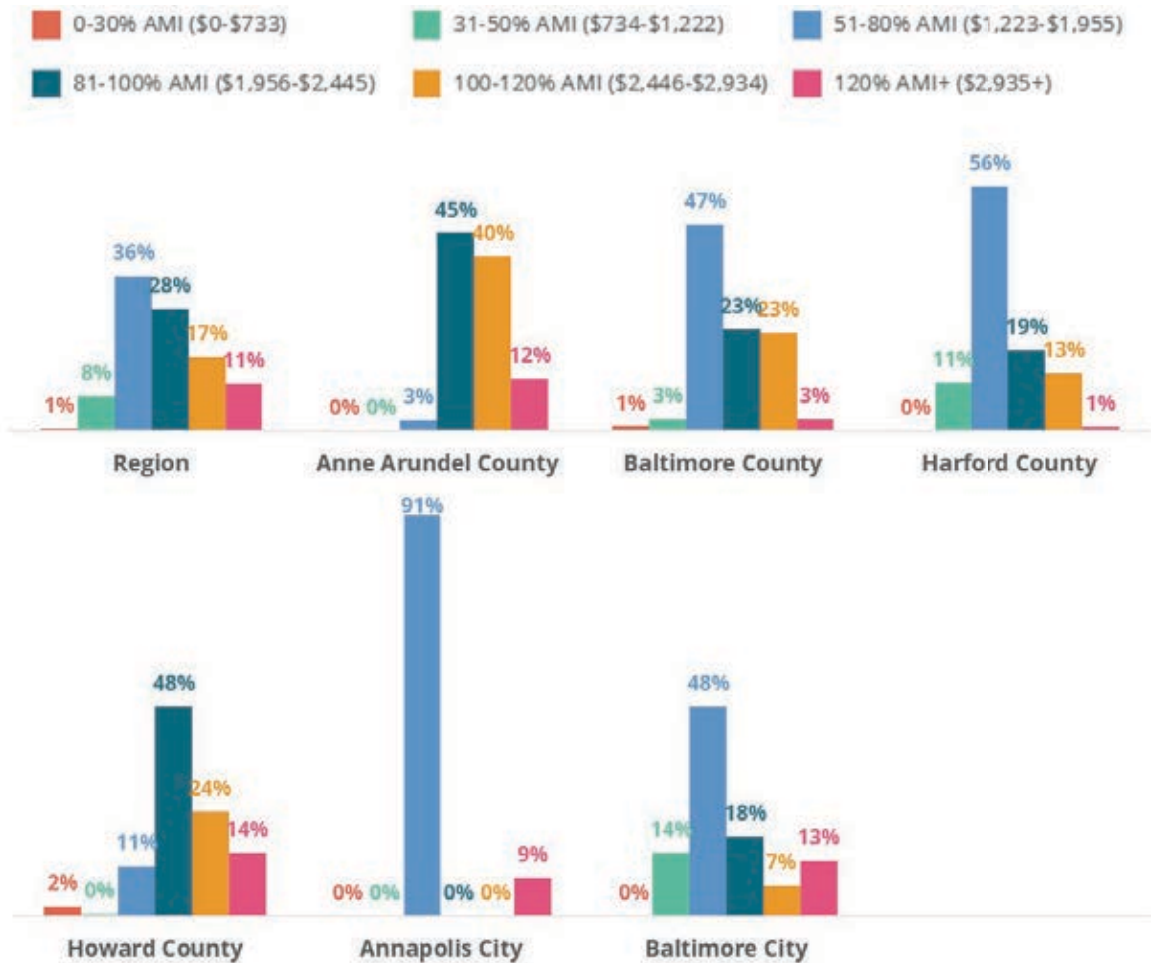


Source: CoStar, HUD AMI Limits, and Root Policy Research.

Figure V-20 presents this distribution for *new* multifamily units only to show again that new multifamily units rent at a premium. Overall in the region, 28% of new multifamily units rent for \$2,446/month or more and are unaffordable to households earning less than 100% AMI for a 2-person household, compared to 7% of multifamily units overall (see

Figure V-19 above). New units are less likely than units overall to be affordable to low to moderate income households in all jurisdictions except for Annapolis, where new construction has been limited to two developments, the larger of which is a designated affordable development.

**Figure V-20.**  
**Distribution of New Multifamily Rental Units by AMI Affordability Level, Baltimore Region and by Jurisdiction, 2024**



Note: "New" units are those constructed within the past five years (2019-2024 YTD). Data include units completed through June 2024. Includes both market rate and designated affordable units. New units in Annapolis include only two new buildings, the larger of which is an affordable development.

Source: CoStar, HUD AMI Limits, and Root Policy Research.

Figure V-21 presents the distribution of multifamily rental units in the region by AMI affordability level alongside income distributions of households—including both owner and renter households—by race and ethnicity. The region's multifamily units are mostly priced to serve renters earning 51-80% AMI: 49% of units are priced at this affordability level.



The distribution of multifamily units by price does not match what households in the region can afford. In particular, the share of multifamily units priced at or below \$733—the maximum affordable rent for households earning up to 30% AMI—is 3%, substantially lower than the 15% share of the region’s households that earn 0-30% AMI. This mismatch is observed for extremely low income households of all races and ethnicities but is especially severe for African American households who disproportionately need units priced at 30% AMI and lower: 24% of African American households earn 0-30% AMI, compared to 13% of Hispanic households, 11% of Non-Hispanic White households, and 11% of Asian households.

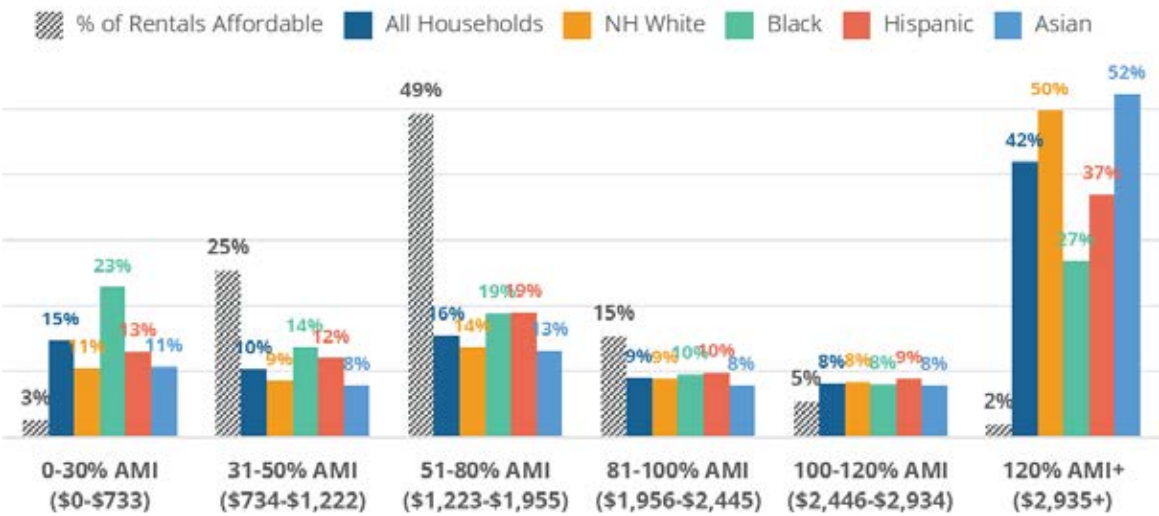
The share of multifamily units affordable to households earning 31-50% AMI (25%) is greater than the share of the region’s households that earn 31-50% AMI (10%). To the extent that they can, households affected by shortages of units will “rent up” into more expensive units and be cost burdened. In the Baltimore region overall, this means that extremely low income households who can’t find affordable rental units must often rent units affordable to households earning higher income levels, limiting the supply of units affordable to and available for household earning incomes higher than 30% AMI. Cumulatively, 28% of rental units are affordable to the 25% of the region’s households that earn 50% AMI or less, though it should be noted that the share of renter households earning 50% AMI or less is higher because renter households are far more likely than owner households to earn very low and extremely low incomes.<sup>5</sup>

To make the apparent surplus of units affordable at 31-50% AMI and 51-80% AMI affordable to renter households earning 0- 30% AMI, these renters would need rental subsidies or vouchers. Without adequate subsidy, these households are also less competitive in the rental market because higher income households “rent down” and crowd out lower income renters. Higher income renters typically have better credit and money for security deposits, and landlords will rent to them over the lower income renters who are on the edge of qualifying.

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<sup>5</sup> Figure III-11, Section III of this report.

**Figure V-21.**  
**Multifamily Rental Affordability by Race and Ethnicity, Baltimore Region, 2022-24**

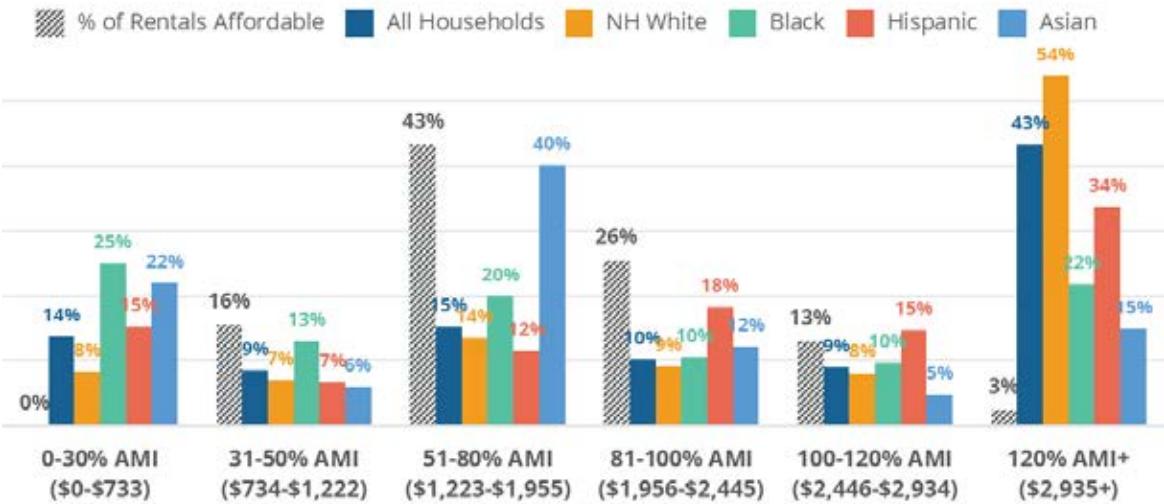


Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

As shown in jurisdictional data presented in Figures V-22 to V-27, multifamily rental affordability varies by jurisdiction. Relative to what local households can afford, multifamily rental markets undersupply units affordable to households earning 0-30% AMI (extremely low incomes) and oversupply units affordable to households earning more than 30% AMI in Annapolis, Baltimore City, Baltimore County, and Harford County.

The region’s Black/African American residents are disproportionately challenged by a rental market that is oriented to serving higher income renters, putting them at greater risk for severe cost burden and housing instability.

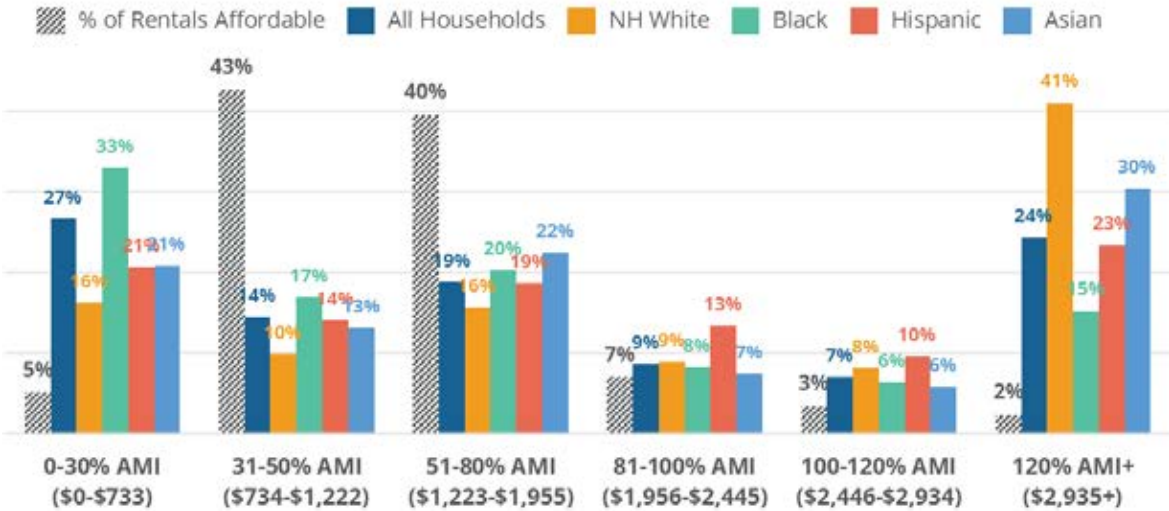
**Figure V-22.**  
**Multifamily Rental Affordability by Race and Ethnicity, Annapolis, 2022-24**



Note: Income distribution of Asian households in Annapolis is subject to large margins of error. Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.

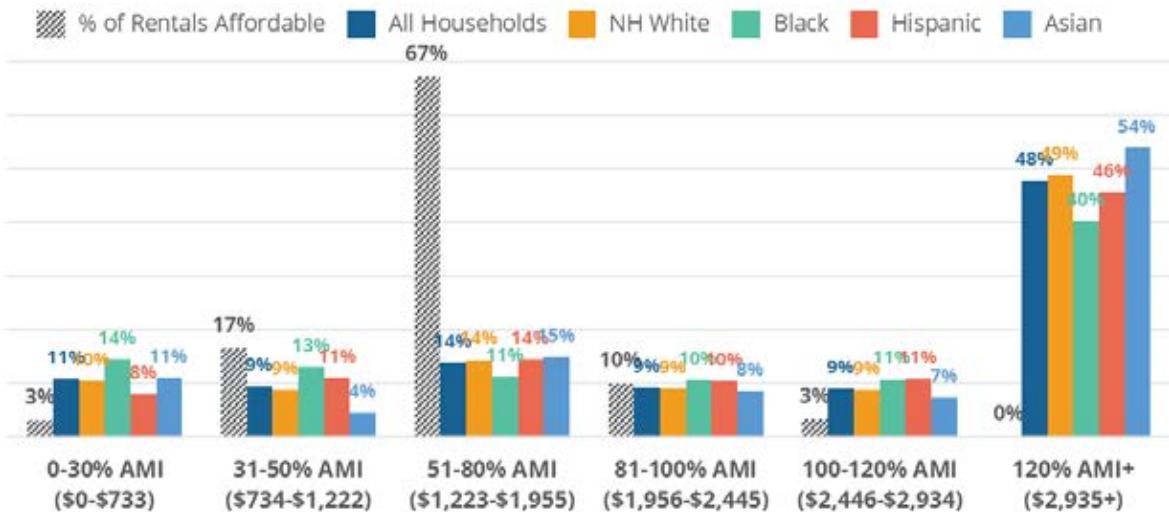
Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

**Figure V-23.**  
**Multifamily Rental Affordability by Race and Ethnicity, Baltimore City, 2022-24**



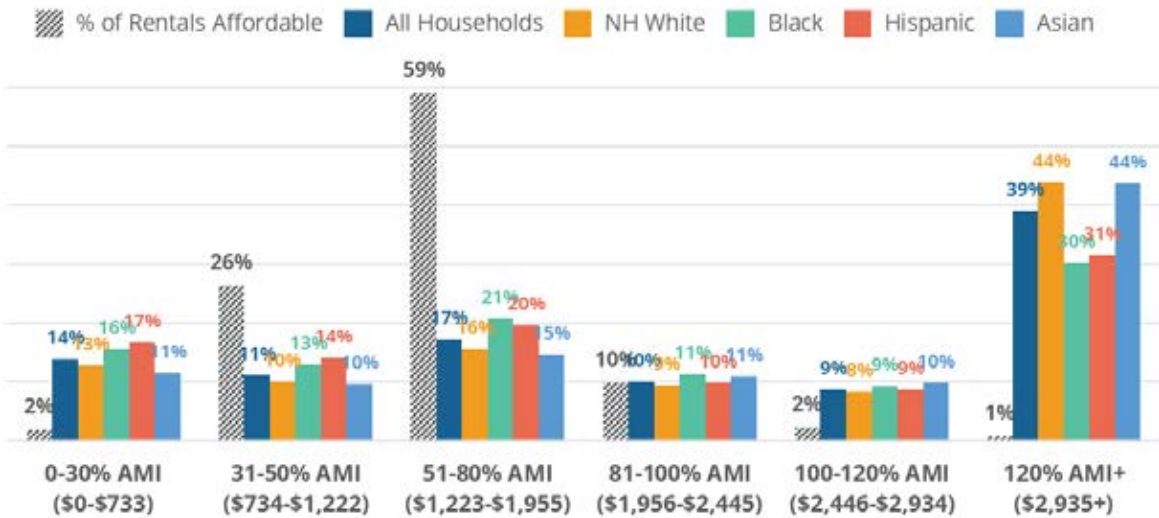
Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

**Figure V-24.**  
**Multifamily Rental Affordability by Race and Ethnicity, Harford County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

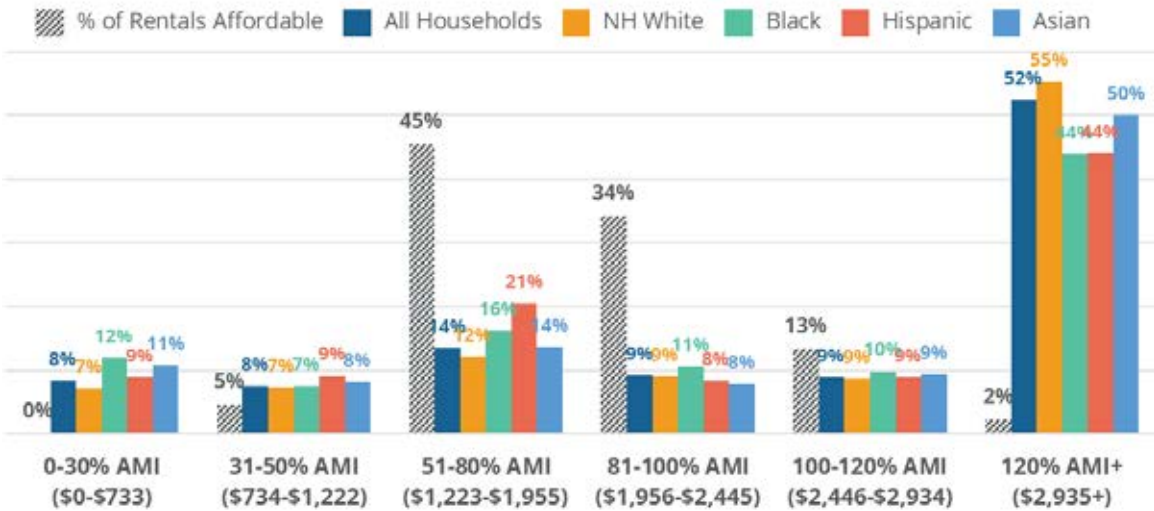
**Figure V-25.**  
**Multifamily Rental Affordability by Race and Ethnicity, Baltimore County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

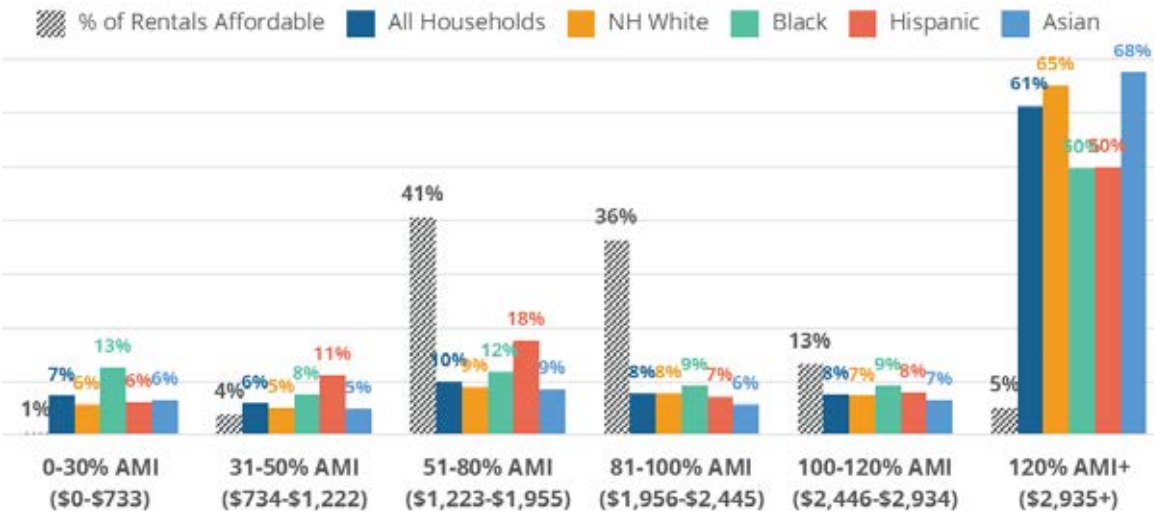
In Anne Arundel and Howard Counties, the shares of households of all races and ethnicities earning 0-30% AMI *and* 31-50% AMI are greater than the shares of multifamily units affordable in these price ranges. It should be noted that, in addition to African American households, Hispanic households also earn incomes affected by shortages at greater rates than households overall in these counties.

**Figure V-26.**  
**Multifamily Rental Affordability by Race and Ethnicity, Anne Arundel County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

**Figure V-27.**  
**Multifamily Rental Affordability by Race and Ethnicity, Howard County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs.  
 Source: 2022 5-year ACS, 2022 and 2024 HUD AMIs, CoStar, and Root Policy Research.

**Accessible multifamily rental units.** Estimates in Figure V-28 approximate the numbers of housing units in the Baltimore region and in its jurisdictions that are accessible or adaptable for residents with disabilities. As there is currently no reliable and publicly



available data source that identifies the number of accessible housing units, estimates have been prepared using the following three-part methodology:

**1. All multifamily developments built since 1991:** The Fair Housing Act requires that the following types of units be “adaptable” for residents with disabilities, meaning that the unit can be easily made accessible within a short time frame:

- All units in buildings completed since 1991 containing four or more units with an elevator
- All ground-floor units in buildings completed since 1991 containing four or more units with no elevator

Based on this requirement, we assume that 33% of units in multifamily housing developments without elevators completed since 1991 are on the ground floor (and therefore adaptable), and 100% of units in multifamily housing developments constructed since 1991 with elevators are adaptable.

**2. Federally assisted multifamily developments built since 1991:** Units developed with the assistance of federal subsidies have additional, more specific accessibility requirements. Under Uniform Federal Accessibility Standards, at least 5% of units (or 1 unit, whichever is greater), in all new federally assisted multifamily developments must be accessible for individuals with mobility issues. An additional 2% of units must be accessible for individuals with hearing or visual disabilities, meaning that a total of 7% of federally assisted units are accessible. This is applied to the total count of federally assisted rental units constructed since 1991, which is approximated by multiplying the total count of federally assisted rental units by the share of total multifamily units constructed since 1991.

**3. Total adaptable or accessible units:** The totals approximated in steps 1 and 2 are aggregated to approximate a count of total accessible housing units in the region and each jurisdiction.

Based on this methodology, 52,477 multifamily units in the Baltimore region are adaptable or accessible. This equates to 20% of the region’s total multifamily housing stock. Baltimore City is home to more accessible units than any other jurisdiction in the region at 18,440 accessible or adaptable units, equating to 20% of multifamily units in the city. As shares of total multifamily units, Howard and Anne Arundel Counties have the largest supplies of accessible or adaptable units at 34% and 29% respectively.

**Figure V-28.**  
**Adaptable or**  
**Accessible**  
**Multifamily Rental**  
**Units, Baltimore**  
**Region and by**  
**Jurisdiction, 2024**

Note:  
 Estimates are imprecise and should  
 be interpreted with caution.

Source:  
 CoStar, National Housing  
 Preservation Database, and Root  
 Policy Research.

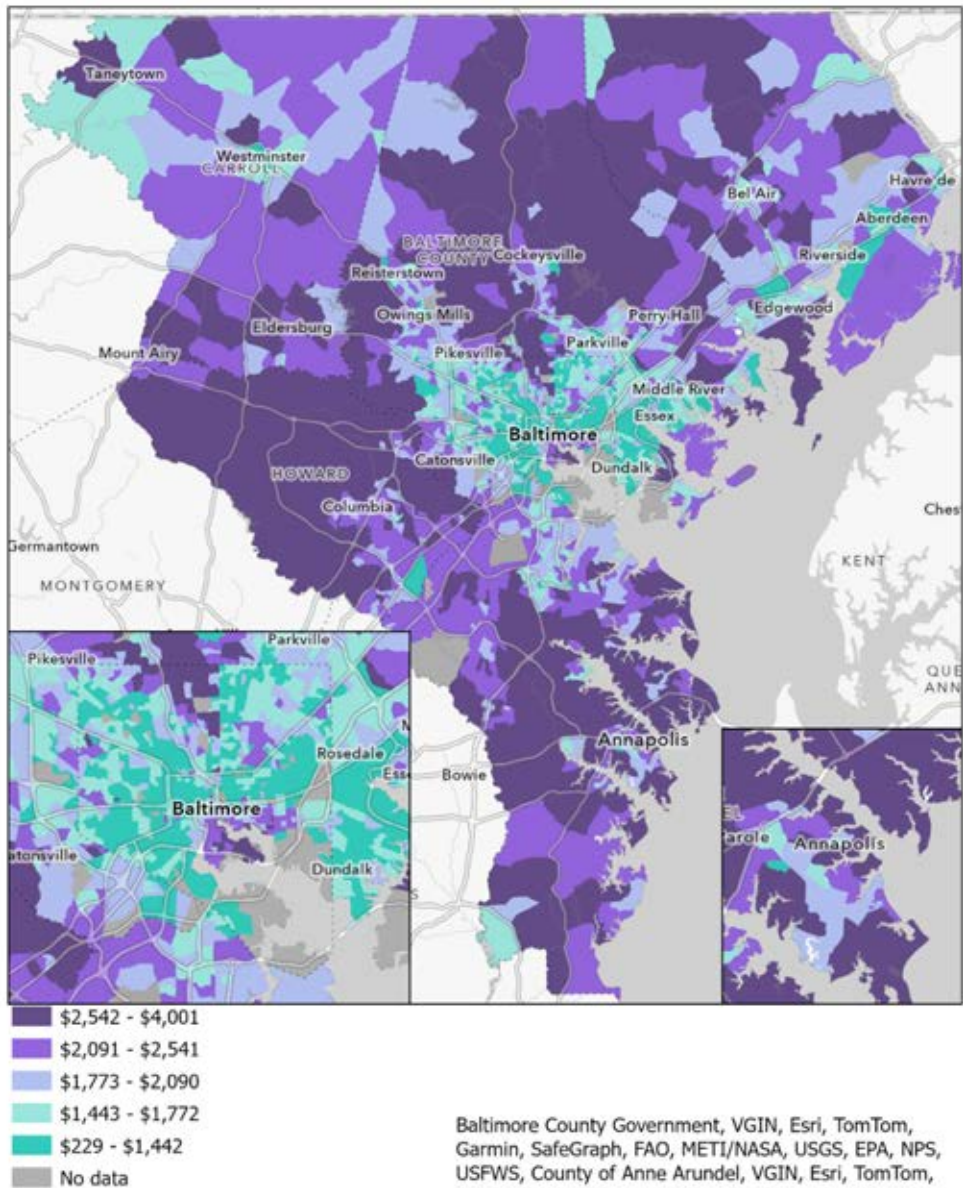
	Accessible or Adaptable Units	Total Multifamily Units	% of Multifamily Units That Are Accessible or Adaptable
Baltimore Region	52,477	264,669	20%
Anne Arundel County	11,017	38,098	29%
Baltimore City	18,440	91,947	20%
Baltimore County	12,120	92,237	13%
Harford County	1,728	15,073	11%
Howard County	9,177	27,314	34%
Annapolis	718	4,722	15%

### Overall Housing Affordability

Using a methodology pioneered by the Center for Neighborhood Technology (CNT), the Baltimore Metropolitan Council weighted homeowner housing costs from the 2019-2023 American Community Survey and renter costs based on the proportion of each in each census block group. The result is Figure V-29 below, using a similar color scheme to the quintile opportunity map in Section IV (Figure IV-58 and Figure V-30 below).

As shown in the map, the regional pattern of housing costs is remarkably similar to the regional pattern of opportunity.

**Figure V-29.**  
**Regional Housing Costs by Census Block Group**



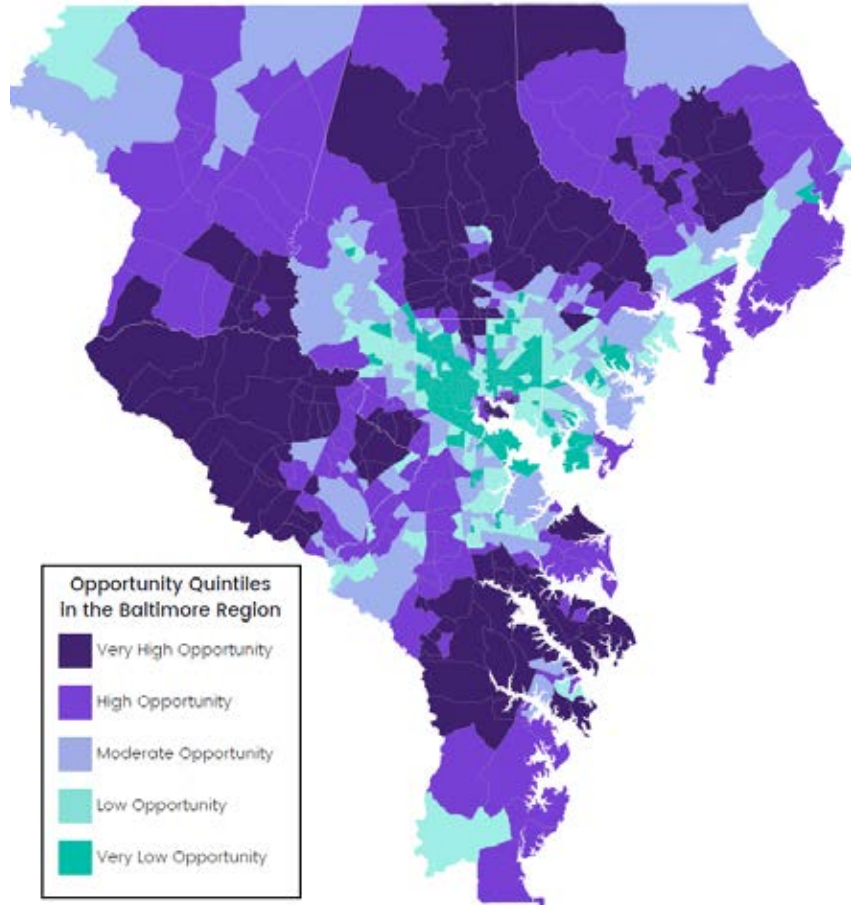
Source: 2019-2023 American Community Survey, BMC

## Housing and Access to Opportunity

High and very high opportunity areas in our 2024 quintile Opportunity Map – Figure IV-58 in Section IV and Figure V-30 below – are attractive for their high-performing schools, low poverty rates, and relative proximity to employment centers. Especially considering housing costs in Figure V-29 above, though, their accessibility for new and long-time residents depends heavily on their stock of affordable and available housing units. This section examines the region’s multifamily rental housing units by size and affordability level in relation to their locations’ opportunity quintiles.

**Figure V-30.**  
**Opportunity Map,**  
**Baltimore Region,**  
**2024**

Source:  
BRHP and BMC.



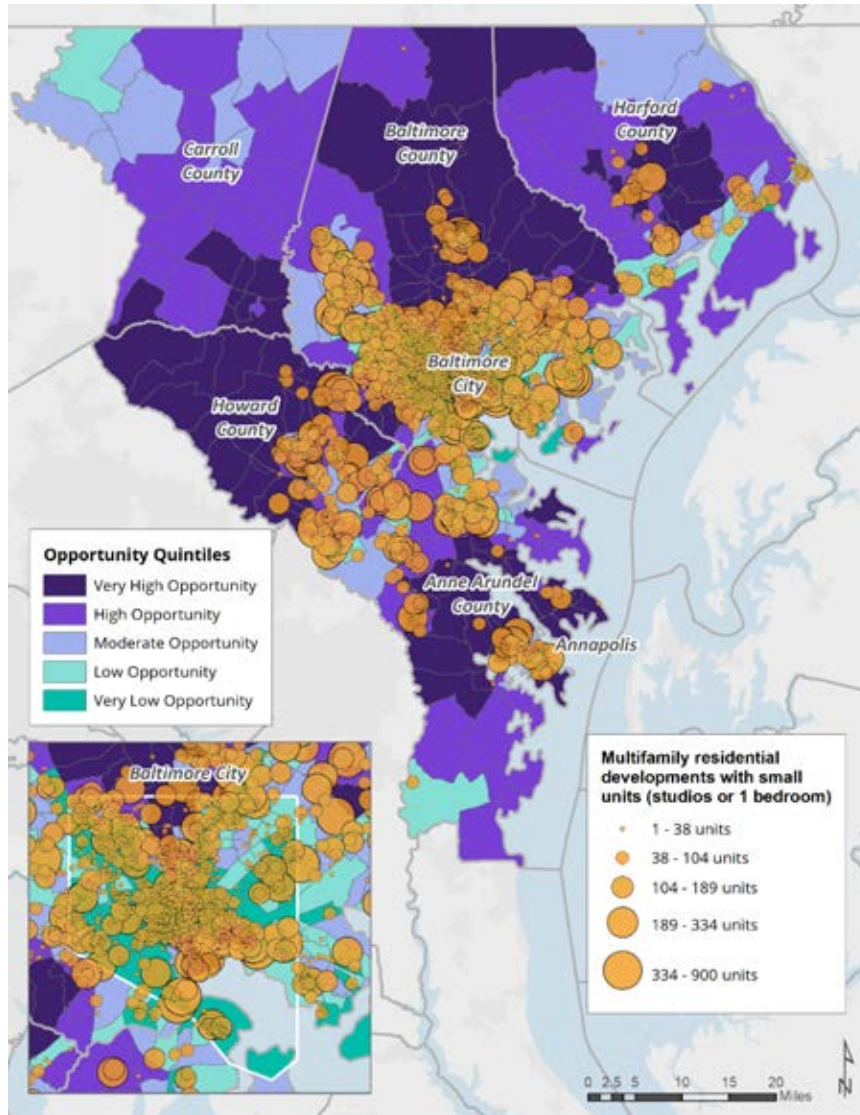
The maps on the following page show multifamily developments containing studios and 1-bedroom units (Figure V-31) and 2-bedroom units (Figure V-32). Dots indicating developments are scaled by the number of units with the given number of bedrooms. As shown in the maps, distributions of developments containing small units and 2-bedroom units are similar: concentrations are strongest in Baltimore City, the city’s surrounding areas in Baltimore County, southern Howard County, northern Anne Arundel County, Annapolis, and southern Harford County.

Developments containing studios, 1-bedroom units, and 2-bedroom units exist in areas in every opportunity quintile, but are most heavily concentrated in very low, low, and

moderate opportunity areas. These developments are most scarce in the high and very high opportunity areas in northern Howard County, central Anne Arundel County, northern Baltimore County, and Harford County.



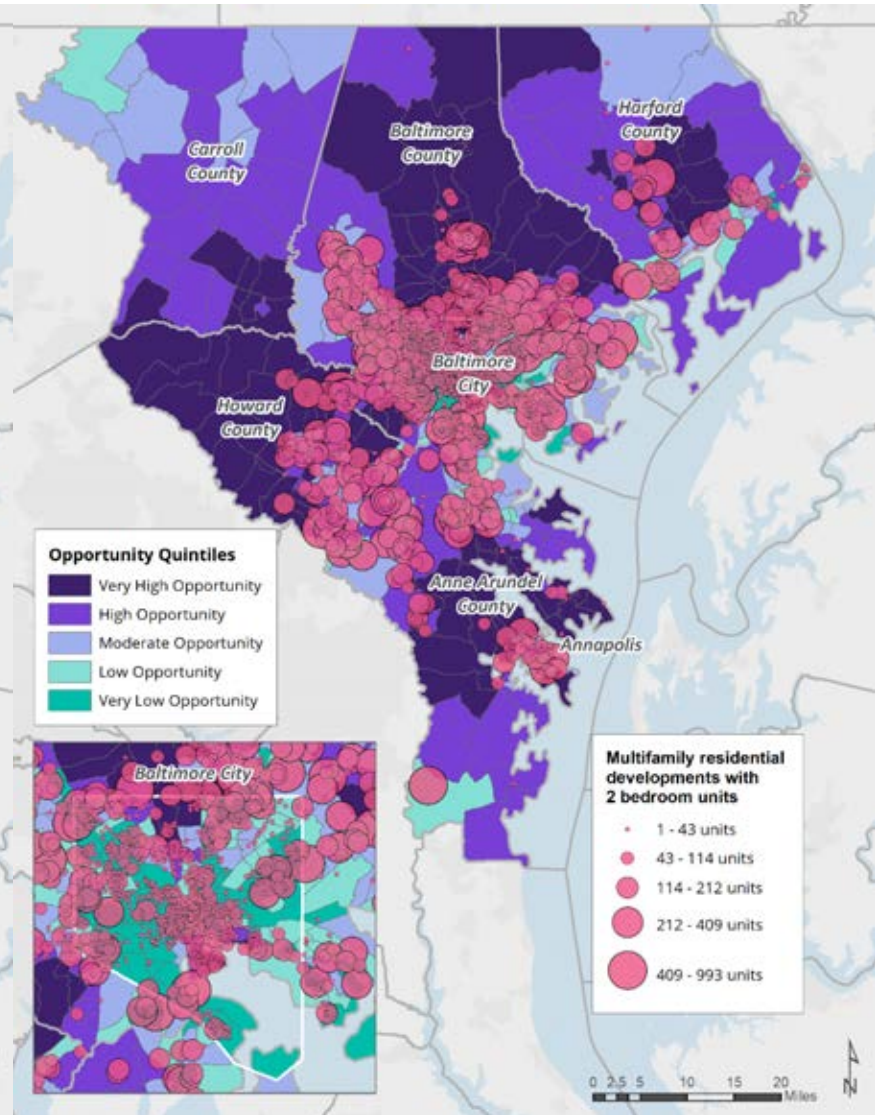
**Figure V-31.**  
**Multifamily Developments with Small Units by**  
**Opportunity Quintile, Baltimore Region, 2024**



Note: Multifamily developments in Carroll County have not been mapped.

Source: CoStar, BHRP, BMC, and Root Policy Research.

**Figure V-32.**  
**Multifamily Developments with 2-Bedroom Units by**  
**Opportunity Quintile, Baltimore Region, 2024**



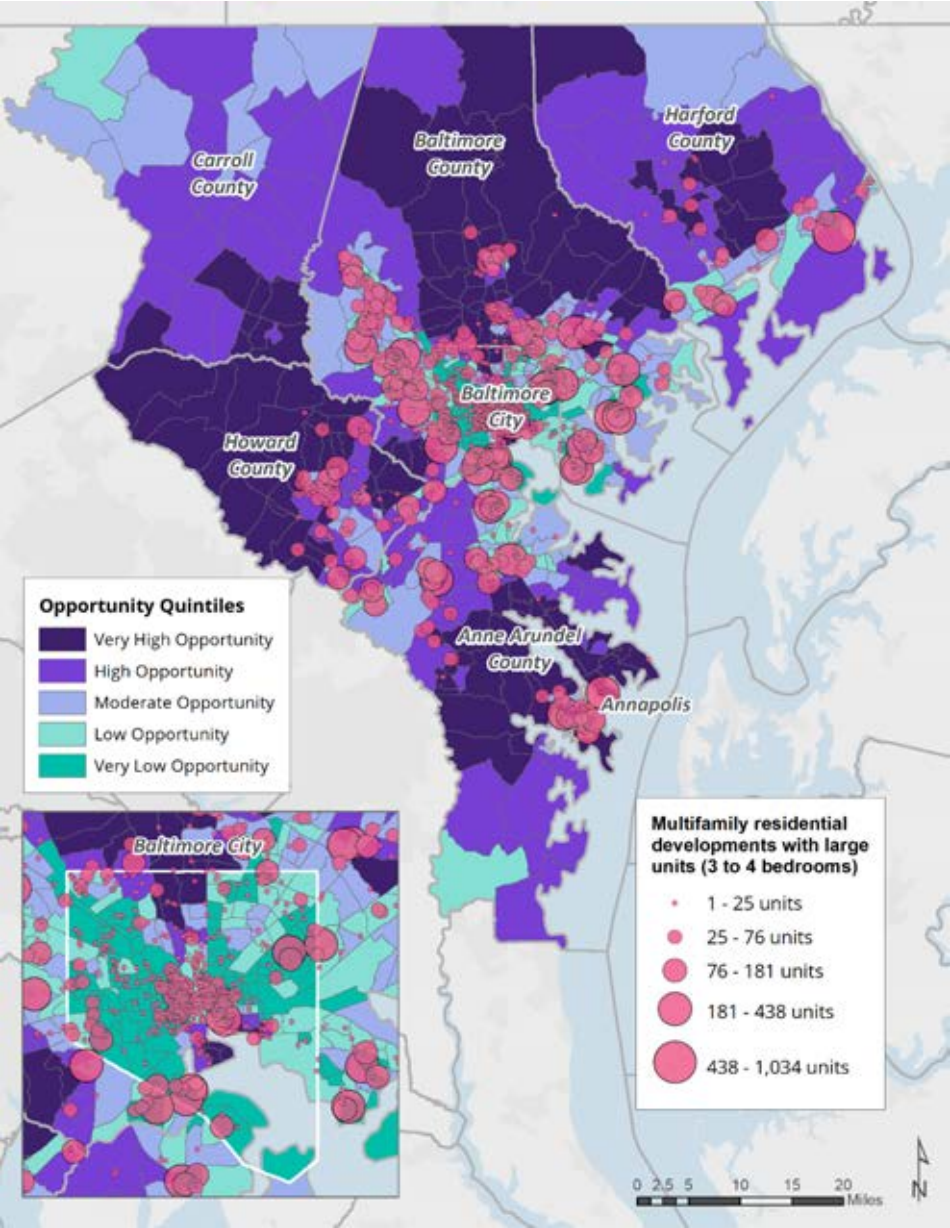
Note: Multifamily developments in Carroll County have not been mapped.

Source: CoStar, BHRP, BMC, and Root Policy Research.



Figure V-33 presents the geographic distribution of developments containing units with three or more bedrooms. While the geographic distribution of these units is largely the same as those of smaller units, far fewer developments contain large units. Larger households or families with children who seek to rent units in high or very high opportunity areas—for example, for proximity to high performing schools—face constrained inventory of multifamily rental units, though these households often prefer to rent townhomes which are not included on the map below.

**Figure V-33.**  
**Multifamily Developments with Large Units by Opportunity Quintile, Baltimore Region, 2024**

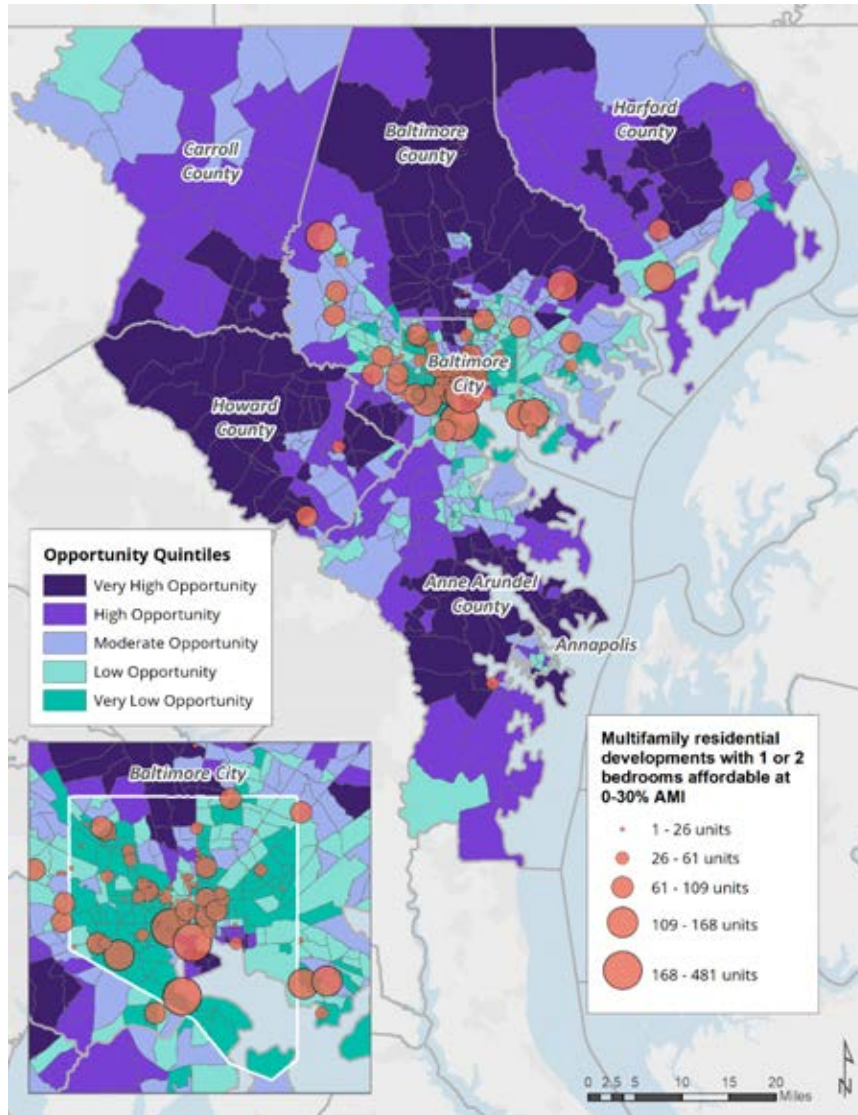


Note: Multifamily developments in Carroll County have not been mapped.

Source: CoStar, BHRP, BMC, and Root Policy Research.

The maps on the following page present developments with 1- or 2-bedroom units affordable at 0-30% AMI (Figure V-34) and 0-50% AMI (Figure V-35). Note that these maps exclude studios and units with three or more bedrooms, as well as many designated affordable units that are affordable at incomes greater than 50% AMI. Units affordable at these income levels are heavily concentrated in Baltimore City, with few exceptions located in surrounding counties. With few exceptions, the vast majority of 1- or 2-bedroom units affordable at these incomes are located in low or very low opportunity areas. This effectively limits socioeconomic mobility for the region's very low and extremely low income residents.

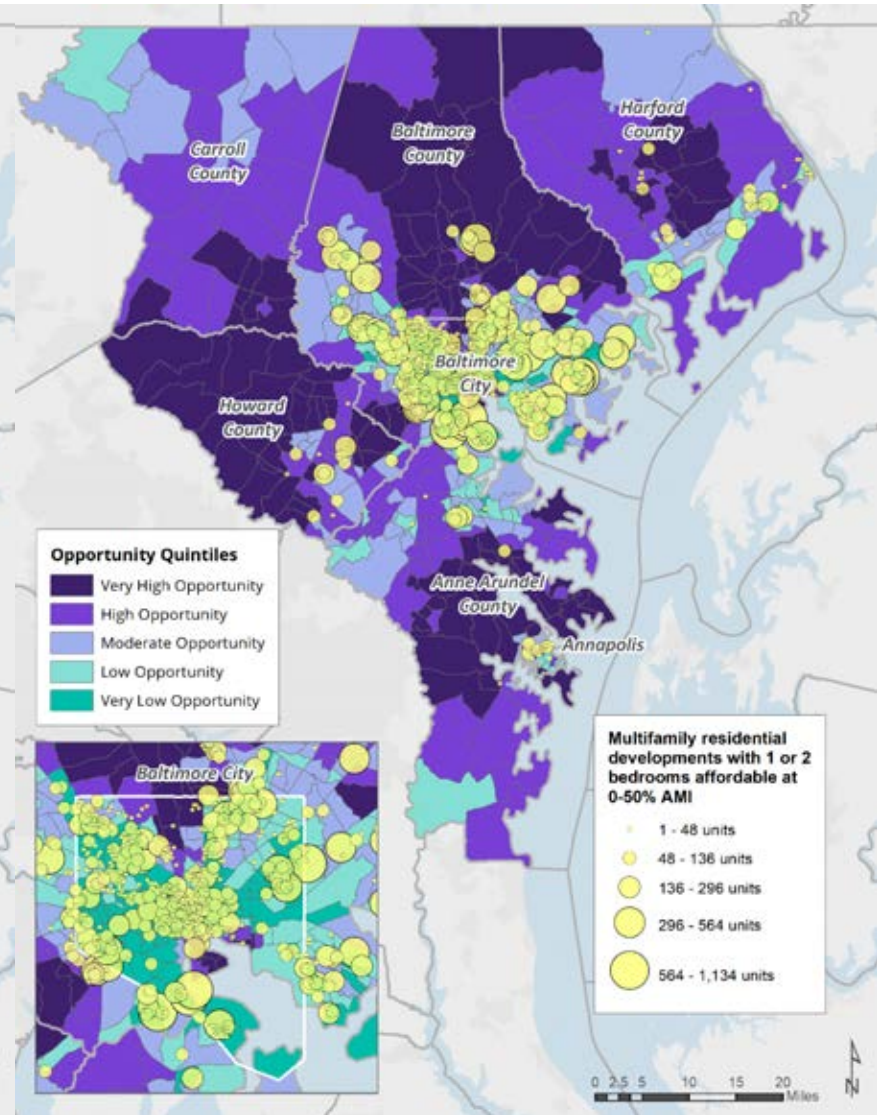
**Figure V-34.**  
**Developments with 1- or 2-Bedroom Units Affordable**  
**at 0-30% AMI, Baltimore Region, 2024**



Note: Multifamily developments in Carroll County have not been mapped.

Source: CoStar, BHRP, BMC, and Root Policy Research.

**Figure V-35.**  
**Developments with 1- or 2-Bedroom Units Affordable**  
**at 0-50% AMI, Baltimore Region, 2024**



Note: Multifamily developments in Carroll County have not been mapped.

Source: CoStar, BHRP, BMC, and Root Policy Research.

## Housing Gaps: Rental

A housing gaps analysis compares the supply of units at various affordability levels with the number of households who need units, based on their household income. Gaps analyses are the most commonly used exercise for determining rental housing needs and to establish goals for addressing needs. This section examines how the lack of supply has a disproportionate impact on low income populations. It begins with a fair share analysis of affordable housing supply in the region and concludes by identifying gaps in supply of rental units affordable to renter households by jurisdiction and income level.

**Jurisdictional share of rental supply.** Regionwide, there are approximately 338,000<sup>6</sup> total rental units, including both multifamily and single family unit (e.g., single family homes, rowhomes, duplexes) rentals. As shown Figure V-36, Baltimore City provides the largest share of rental units of all prices at 37%, followed by Baltimore County at 32%. Harford County has the smallest share of the region's rental units at 6%.

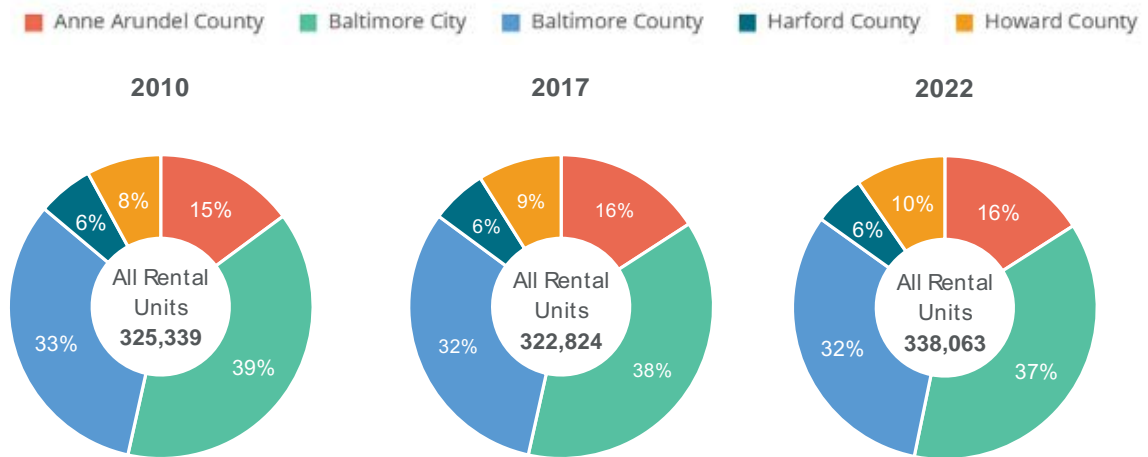
The rental unit distribution differs significantly, however, for deeply affordable units renting at less than \$500 per month and serving the region's renters earning less than \$20,000 per year. At this level, Baltimore City provides the vast majority of affordable rentals—69%, compared to 37% of all units. The distribution improves for units renting between \$500 to \$750 (accommodating incomes between \$20,000 and \$30,000 per year), although Baltimore City continues to provide more than its overall share and surrounding jurisdictions provide less, except for Harford County.

The figures also show the same distributions of rental units for 2010 and 2017 to examine if the balance has shifted. The graphics demonstrate some improvement in the share of affordable rental housing provided by the counties: their share of units has increased slightly relative to their overall share of all rental units—although, even with this shift, Baltimore City continues to provide a far greater share of affordable rentals. Mostly, a more equitable distribution was achieved between 2010 and 2017—but was partially reversed between 2017 and 2022.

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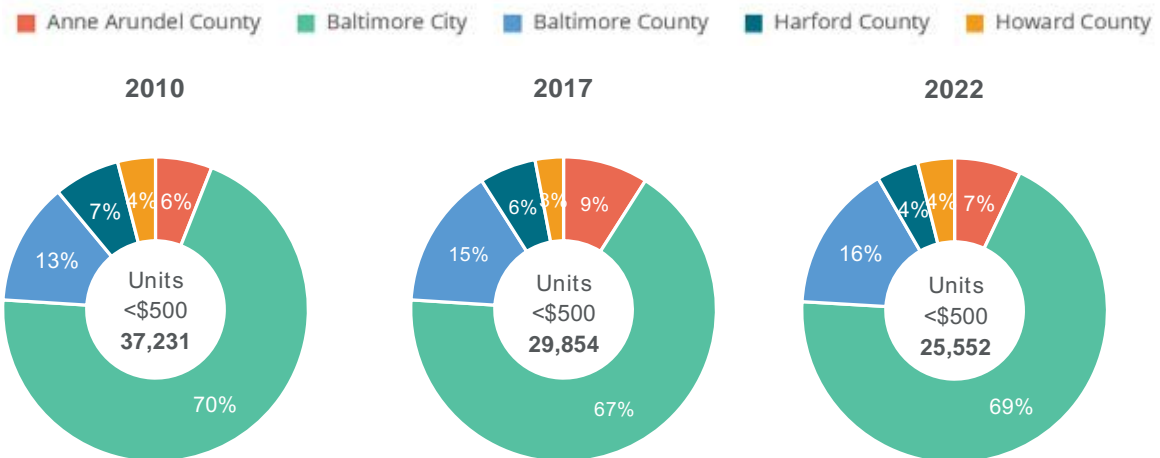
<sup>6</sup> Does not include rental units without cash rent (e.g., renter does not pay rent and instead provides household assistance).

**Figure V-36.**  
**County/City Share of Rental Units, 2010, 2017, and 2022**



Source: 2010 Census, 2017 5-year ACS, 2022 5-year ACS.

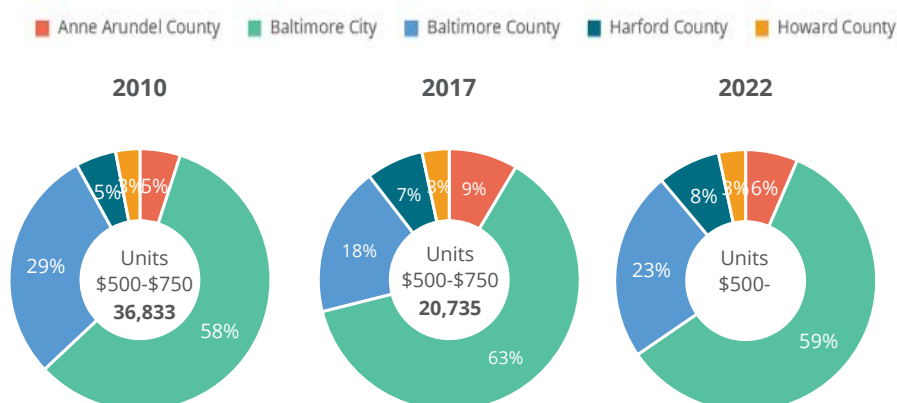
**Figure V-37.**  
**County/City Share of Deeply Affordable Rental Units (< \$500/month), 2010, 2017, and 2022**



Source: 2010 Census, 2017 5-year ACS, 2022 5-year ACS.



**Figure V-38.**  
**County/City Share of Deeply Affordable Rental Units (\$500-\$750/month),**  
**2010, 2017, and 2022**



Source: 2010 Census, 2017 1-year ACS, 2022 5-year ACS. The figures below present the data behind the above pie charts from 2017 and 2022. It also highlights where deeply affordable rentals are over- (positive percentages) and under- (negative percentages) supplied relative to all rental units.

As shown in Figure V-39, in 2022, Baltimore City provided 69% of the region's deeply affordable rentals (renting for less than \$500)—which is well above the city's share of rental households overall of 37% (32 percentage points more). The city also provides 59% of the region's rental units priced between \$500 and \$750 per month, affordable to households earning between \$20,000 and \$30,000 per year.

In contrast, the surrounding counties are undersupplying affordable rental units relative to their supply of all rental units. This difference is most pronounced for units renting for less than \$500 per month in Baltimore County (16 percentage point difference). Of all surrounding counties, Harford does the best in supplying affordable rentals, compared to its share of all rental units.

Compared to 2017—shown in Figure V-40—Baltimore City provides more deeply affordable units renting for less than \$500 and those renting for \$500 to \$750. Anne Arundel and Harford counties contributed less deeply affordable units in 2022 compared to 2017.



**Figure V-39.**  
**Share of All Rental Units and Affordable Rental Units, 2022**

	All Rental Units	% of All Rental Units	Units renting for less than \$500	% of less than \$500 units	Over/Under Supply	Units renting from \$500 to \$750	% of \$500 to \$750 units	Over/Under Supply
Anne Arundel County	53,893	16%	1,803	7%	-9%	862	6%	-9%
Baltimore County	107,115	32%	4,021	16%	-16%	3,129	23%	-8%
Harford County	18,611	6%	1,135	4%	-1%	1,036	8%	2%
Howard County	32,418	10%	996	4%	-6%	448	3%	-6%
Baltimore City	126,026	37%	17,597	69%	32%	7,875	59%	22%
Region	338,063	100%	25,552	100%		13,350	100%	

Note: Table does not include rental units without cash rent (e.g., renter does not pay rent and instead provides household assistance).

Source: 5-year ACS, 2022.

**Figure V-40.**  
**Share of All Rental Units and Affordable Rental Units, 2017**

	All Rental Units	% of All Rental Units	Units renting for less than \$500	% of less than \$500 units	Over/Under Supply	Units renting from \$500 to \$750	% of \$500 to \$750 units	Over/Under Supply
Anne Arundel County	50,906	16%	2,756	9%	-7%	1,764	11%	-5%
Baltimore County	102,925	32%	4,599	15%	-16%	3,824	24%	-8%
Harford County	18,817	6%	1,768	6%	0%	1,473	9%	4%
Howard County	28,263	9%	832	3%	-6%	697	4%	-4%
Baltimore City	121,913	38%	19,899	67%	29%	8,023	51%	13%
Region	322,824	100%	29,854	100%		15,781	100%	

Note: Table does not include rental units without cash rent (e.g., renter does not pay rent and instead provides household assistance).

Source: 5-year ACS, 2017.

Figure V-41 on the following page estimates each jurisdiction's gap in rental housing provision by AMI level. It is based on a comparison of what renters in that jurisdiction can afford by AMI level to the number of affordable rental units and subsidies available in that jurisdiction.

There are two separate gaps estimates in the table. The first is the simple renter household to rental unit comparison within each jurisdiction, called "Shortage of Affordable Rentals" in the table. To reach these estimates, the number of renter households in a jurisdiction that earn incomes within a given income range is subtracted from the number of rental units in the jurisdiction that are affordable to them through market rate rental units, publicly assisted rental units, and/or the use of tenant-based rental assistance. Negative numbers indicate a unit or subsidy shortage. The same analysis is conducted in terms of percentages: the share of a jurisdiction's renter households that earn incomes within a given income range is subtracted from the share of the jurisdiction's rental units that are affordable to these households.

The second gaps estimate, called "Shortage Adjusted to Overall Rental Distribution" in the table, calculates rental gaps by jurisdiction by applying each jurisdiction's share of total rental units in the region (labeled "% of All Rental Units" in Figure V-39) to the region's shortage of affordable rentals identified in the first gaps estimate. As discussed previously, Baltimore City oversupplies deeply affordable rental housing relative to its share of the region's rental housing, while the surrounding counties undersupply deeply affordable rental units. The second gaps estimate shows what is needed for each jurisdiction to meet their "fair share" of affordable rental housing provision. In other words, the second estimate shows the number of rental units that each jurisdiction would need to make affordable at each income level through units or rental subsidies in order to resolve the regional shortage in affordable housing if each jurisdiction provided a share of the region's affordable rental housing proportional to its share of the region's rental housing overall.

For example, under the original gaps, Anne Arundel County may set a goal to lower its gap at the 30% AMI level (shortage of 5,279 units). Under the adjusted gap, the county's goal would be larger (addressing a gap of 8,548 units) because the county would be helping to meet the region's need for that level of affordability in proportion to the county's overall share of the region's rental housing.

**Figure V-41.**  
**Adjusted Rental Unit Shortage by Jurisdiction, 2022**

	Shortage of Affordable Rentals						Shortage Adjusted to Overall Rental Distribution					
	0-30% AMI Renters		0-50% AMI Renters		0-80% AMI Renters		0-30% AMI Renters		0-50% AMI Renters		0-80% AMI Renters	
Anne Arundel County	-5,279	10%	-7,576	17%	231	1%	-8,505	16%	-7,026	16%	6,531	16%
Baltimore County	-18,888	35%	-18,877	43%	16,596	40%	-16,908	32%	-13,967	32%	12,982	32%
Harford County	-2,766	5%	-2,391	5%	3,534	9%	-3,045	6%	-2,515	6%	2,338	6%
Howard County	-4,276	8%	-5,994	14%	793	2%	-5,117	10%	-4,227	10%	3,929	10%
Baltimore City	-22,217	42%	-9,299	21%	19,869	48%	-19,852	37%	-16,400	37%	15,243	37%
Region	-53,427	100%	-44,135	100%	41,023	100%	-53,427	100%	-44,135	100%	41,023	100%

Source: 2022 5-year ACS and Root Policy Research.

Figure V-42 shows the numbers of households on wait lists maintained by public housing authorities in the region. The wait lists indicate a significant need for affordable rental housing in the region: there are more than 134,000 unduplicated households on the wait list among all of the housing authorities. This compares with 107,000 in the last AI. The largest increases in wait lists have occurred in Anne Arundel County and Baltimore City. The only wait lists that are open to new applicants are site based vouchers.

**Figure V-42.**  
**Waiting Lists**  
**in Region**

Note:  
\*Includes all  
demographic categories,  
including people with  
disabilities.

Source:  
BMC.

Jurisdiction	Public Housing Authority Waiting Lists
Anne Arundel County	41,990
City of Annapolis	2,545
Baltimore City	77,450
Baltimore County	7,500
Harford County	1,548
Howard County	3,500
Regional Mobility Program	14,000
<b>Totals</b>	<b>134,533</b>

## Housing Gaps: Homeownership Housing

**Home sales metrics.** Figure V-43 presents median sold price, median days on market, and months of supply for the Baltimore Metro area<sup>7</sup> and each jurisdiction as of April 2024, comparing these to their April 2023 levels.

Homes in the Metro area sold for a median price of \$400,000 in April 2024, up 6.7% from April 2023. Median sold prices were at least 5% higher in April 2024 than in April 2023 in all jurisdictions except for Baltimore City, where the median sold price did not change from April 2023. Howard County, which had the highest median sold price in April 2024 (\$646,750), saw the greatest home price growth since 2023 at +14.5%. Anne Arundel County had the second highest home price at \$517,000, while sold prices were lowest at the median in Baltimore City at \$225,000.

In April 2024, homes for sale in the Baltimore Metro area spent a median of only seven days on the market. Homes sold fastest in Howard County at five days, while homes in Anne Arundel County, Baltimore County, and Harford County also spent one week or less on the market at the median. Homes took longer to sell in Baltimore City at a median of 18 days, up from 12 days in April 2023. Note, however, that this is still a relatively brief time on the market: homes for sale in the United States in the same month spent a median of 44 days on the market.<sup>8</sup>

It is estimated that the inventory of homes for sale in the Baltimore Metro area would take 1.69 months to sell if the current sales pace continues, up from an estimated 1.25 months in April 2023. As four to six months of supply is believed to indicate a balanced market with moderate price appreciation, this indicates high demand for a very limited supply of homes for sale—an environment conducive to rapidly rising prices.

Howard County has the lowest for sale supply in the region at less than 1 month, which partially explains the county's exceptional price growth since 2023. Baltimore City has the greatest supply of homes for sale in the region at 2.91 months of supply in April 2024, though it is important to note that this is low relative to industry standards for balanced for-sale markets and relative to national supply for the same month: the United States had an estimated 9.3 months of supply in April 2024.<sup>9</sup>

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<sup>7</sup> The Baltimore Metro area includes Anne Arundel County, Baltimore City, Baltimore County, Carroll County, Harford County, and Howard County.

<sup>8</sup> Source: Federal Reserve Bank of Saint Louis and Realtor.com.

<sup>9</sup> Source: Federal Reserve Bank of Saint Louis, HUD, and U.S. Census Bureau.

**Figure V-43.**  
**Home Purchase Market Statistics, Baltimore Metro and by Jurisdiction,**  
**April 2024**

	Median Sold Price		Median Days on Mkt		Months of Supply	
	May 2024	May 2024 vs. May 2023	May 2024	May 2024 vs. May 2023	May 2024	May 2024 vs. May 2023
<b>Baltimore Metro</b>	\$400,000	6.7%	7	+1	1.69	+0.44
<b>Anne Arundel County</b>	\$517,000	5.7%	6	+0	1.18	+0.18
<b>Baltimore City</b>	\$225,000	0.0%	18	+6	2.91	+0.74
<b>Baltimore County</b>	\$370,000	7.9%	7	+1	1.43	+0.42
<b>Harford County</b>	\$385,000	5.0%	7	+2	1.42	+0.51
<b>Howard County</b>	\$646,750	14.5%	5	-1	0.95	+0.17

Note: Baltimore Metro includes Anne Arundel County, Baltimore City, Baltimore County, Harford County, Howard County, and Carroll County. Data are not available for Annapolis.

Source: Bright Research.

For added context on historical home values, Figures V-44 and V-45 shows trends in typical home values since 2000.<sup>10</sup> Home values differ by jurisdiction—with Baltimore City’s values remaining the lowest and Howard County’s values the highest—but have generally followed the Baltimore-Columbia-Towson Metropolitan Statistical Area (MSA)’s trends since 2000.<sup>11</sup> Home values peaked in 2006-2007 before the Great Recession, fell from 2008 to 2012, increased steadily through the 2010s, increased rapidly from 2020 to 2022, and continued to grow through 2024 year-to-date.

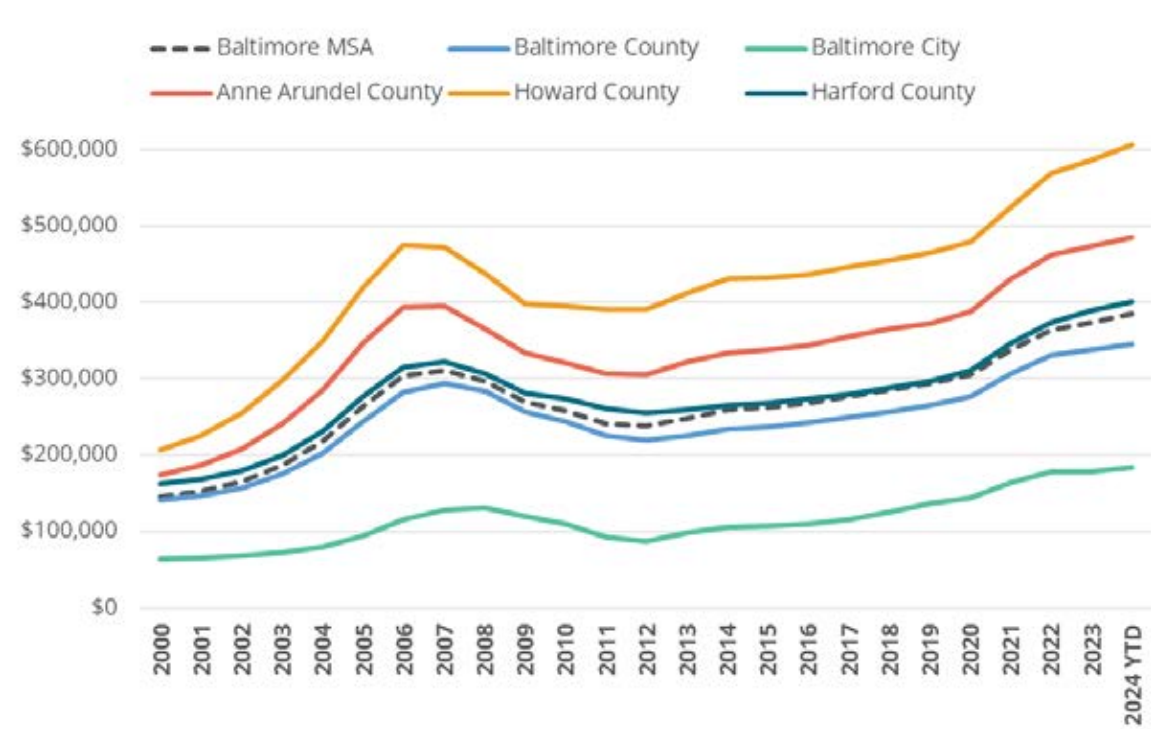
In the Baltimore MSA overall, home values increased by 31% in the past five years. Baltimore City’s typical home values increased at the greatest rates in the region in the past five, ten, fifteen, and twenty years. In the past five years, Howard County’s typical home value increased at the same rate as Baltimore City’s.

<sup>10</sup> Zillow Home Value Index data reflect the typical value for homes in the 35<sup>th</sup> to 65<sup>th</sup> percentile range.

<sup>11</sup> The Baltimore-Columbia-Towson MSA includes Anne Arundel County, Baltimore City, Baltimore County, Carroll County, Harford County, Howard County, and Queen Anne’s County.



**Figure V-44.**  
**Typical Home Value, Baltimore MSA and Baltimore Region Jurisdictions,**  
**2000–2024 YTD**



Note: 2024 YTD data include data from January 2024 to July 2024.

Source: Zillow Home Value Index and Root Policy Research.

**Figure V-45.**  
**Change in Typical Home Value, Baltimore MSA and Baltimore Region**  
**Jurisdictions, 2004, 2009, 2014, and 2019 to 2024 YTD**

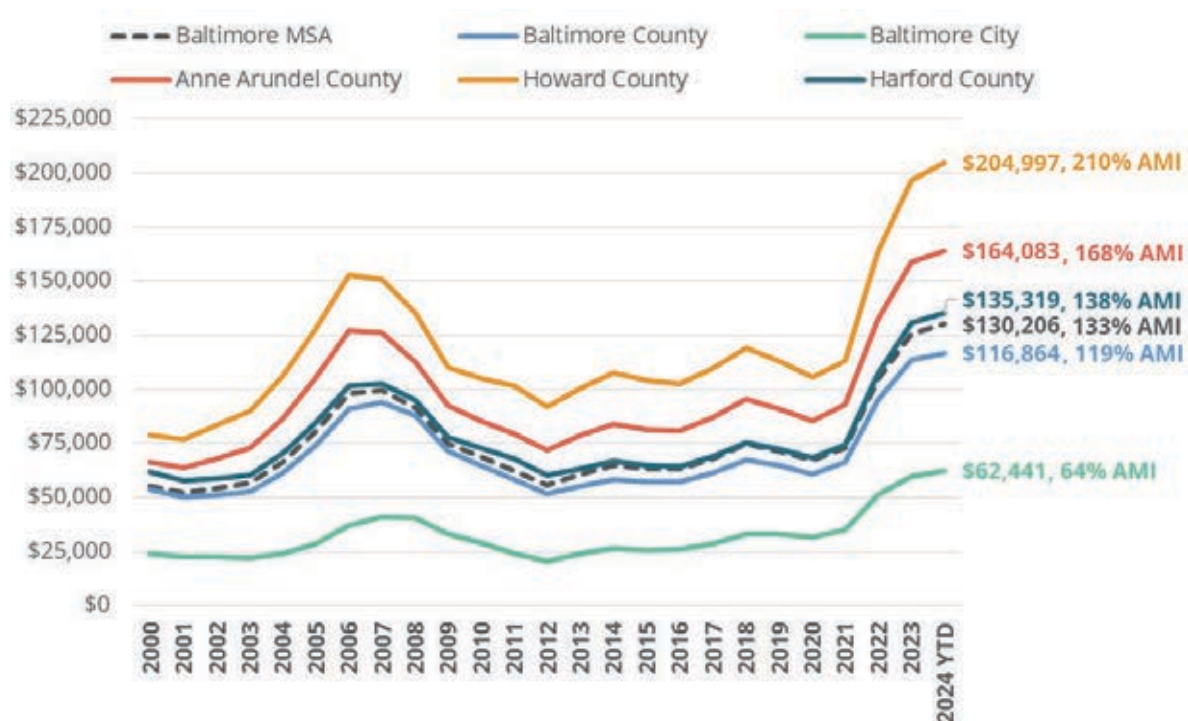
	Typical Home Value					Value Growth			
	2004	2009	2014	2019	2024	2004-2024	2009-2024	2014-2024	2019-2024
Baltimore MSA	\$219K	\$270K	\$259K	\$294K	\$386K	76%	43%	49%	31%
Anne Arundel County	\$285K	\$334K	\$335K	\$373K	\$486K	70%	46%	45%	30%
Baltimore City	\$80K	\$119K	\$106K	\$137K	\$185K	132%	55%	74%	35%
Baltimore County	\$203K	\$258K	\$234K	\$266K	\$346K	71%	34%	48%	30%
Harford County	\$232K	\$282K	\$266K	\$297K	\$401K	73%	42%	51%	35%
Howard County	\$350K	\$398K	\$430K	\$465K	\$607K	73%	52%	41%	31%

Note: 2024 YTD data include data from January 2024 to July 2024.

Source: Zillow Home Value Index and Root Policy Research.

**Trends in home purchase affordability.** Based on the typical home prices presented above and annual average mortgage rates in the United States, Figure V-46 presents the household incomes required to purchase a home from 2000 to 2024 YTD. Incomes required to afford a typical-priced home in the Baltimore MSA increased gradually overall in the 2010s, hovering around \$65,000. Alongside rising home prices, pandemic-related interest rate hikes caused purchasing power to fall rapidly beginning in 2022. In 2024 YTD, households must earn \$130,200—equivalent to 133% AMI—to afford a typical home in the Baltimore MSA. Households must earn over \$200,000 to afford a typical-priced home in Howard County. Homes are most affordable in Baltimore City, where households can affordably purchase a home on an annual income of \$62,400.

**Figure V-46.**  
**Household Income Required to Afford a Typical-Priced Home, Baltimore MSA and Baltimore Region Jurisdictions, 2000–2024 YTD**



Note: 2024 YTD data include data from January 2024 to July 2024.

Calculations assume a 30-year mortgage at annual average interest rates with a 10% downpayment and 30% of monthly housing costs to property taxes, insurance, HOA fees, and other expenses. Households can afford a housing payment when it consumes no more than 30% of their monthly income.

AMI equivalencies presented are based on the 2-person 2024 AMI.

Source: Zillow Home Value Index, FRED by the Federal Reserve Bank of St. Louis, HUD AMI Limits, and Root Policy Research.

The table in Figure V-47 summarizes the trends presented in Figure V-46. The income required to afford a typical-priced home in the Baltimore MSA has doubled in the past ten years, with much of this growth taking place in the past five years. The income needed to afford a typical-priced home has increased by 82% since 2019.

In the past 20 years, the income required to service a mortgage on a typical priced home has increased at the greatest rate (+159% from 2004 to 2024) in Baltimore City.

**Figure V-47.**  
**Change in Household Income Required to Afford a Typical-Priced Home, Baltimore MSA and Baltimore Region Jurisdictions, 2004, 2009, 2014, and 2019 to 2024 YTD**

	HH Income Required					Change in Income Required			
	2004	2009	2014	2019	2024	2004-2024	2009-2024	2014-2024	2019-2024
Baltimore MSA	\$66K	\$75K	\$65K	\$72K	\$130K	96%	74%	100%	82%
Anne Arundel County	\$86K	\$93K	\$84K	\$91K	\$164K	90%	77%	96%	81%
Baltimore City	\$24K	\$33K	\$27K	\$33K	\$62K	159%	89%	134%	87%
Baltimore County	\$61K	\$71K	\$59K	\$65K	\$117K	90%	64%	100%	81%
Harford County	\$70K	\$78K	\$67K	\$72K	\$135K	93%	73%	103%	87%
Howard County	\$106K	\$110K	\$108K	\$113K	\$205K	93%	86%	90%	81%

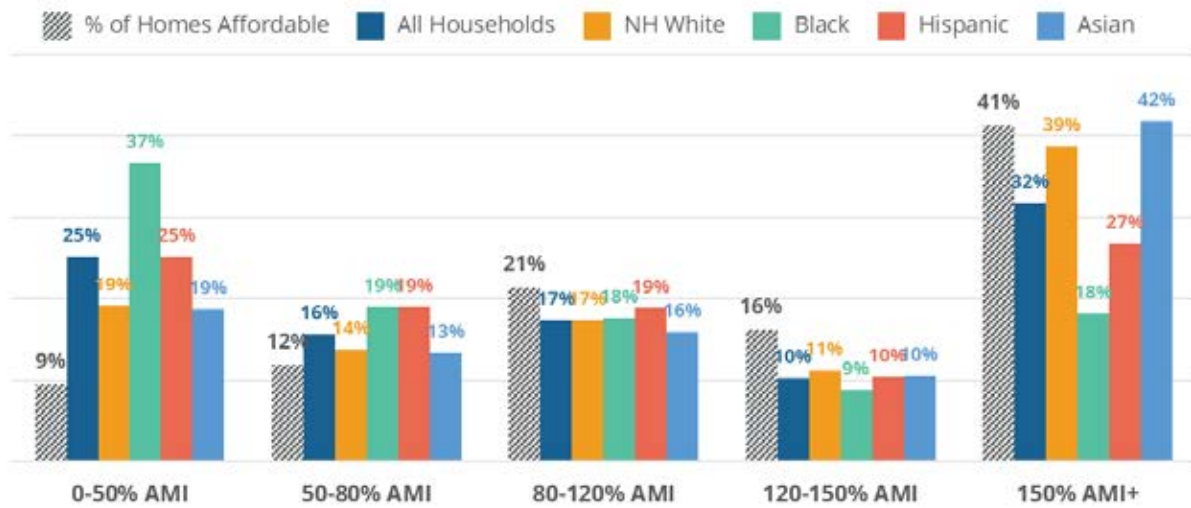
Note: 2024 YTD data include data from January 2024 to July 2024.  
Calculations assume a 30-year mortgage at annual average interest rates with a 10% downpayment and 30% of monthly housing costs to property taxes, insurance, HOA fees, and other expenses. Households can afford a housing payment when it consumes no more than 30% of their monthly income.

Source: Zillow Home Value Index, FRED by the Federal Reserve Bank of St. Louis, HUD AMI Limits, and Root Policy Research.

**Purchase affordability by race and ethnicity.** Figure V-48 shows the value distribution of the region’s owner-occupied homes by AMI affordability level alongside income distributions of the region’s households by race and ethnicity. The figure shows that demand outweighs supply for owner-occupied homes affordable to households earning very low and extremely low incomes (less than 50% AMI or \$46,450 in 2024): 25% of the region’s households earn these incomes, but only 9% of owner-occupied units are affordable to them. African American households—37% of whom earn less than 50% AMI—are disproportionately impacted by this mismatch in supply and demand.

Shortages in affordable supply persist at 50-80% AMI (\$46,450 to \$74,320 in 2024): 16% of households in the region—including 19% of African American or Black and Hispanic households, 14% of Non-Hispanic White households, and 13% of Asian households—have incomes between 50% AMI and 80% AMI, but only 12% of owner-occupied units in the region are affordable to them.

**Figure V-48.**  
**Purchase Affordability by Race and Ethnicity, Baltimore Region, 2022-24**



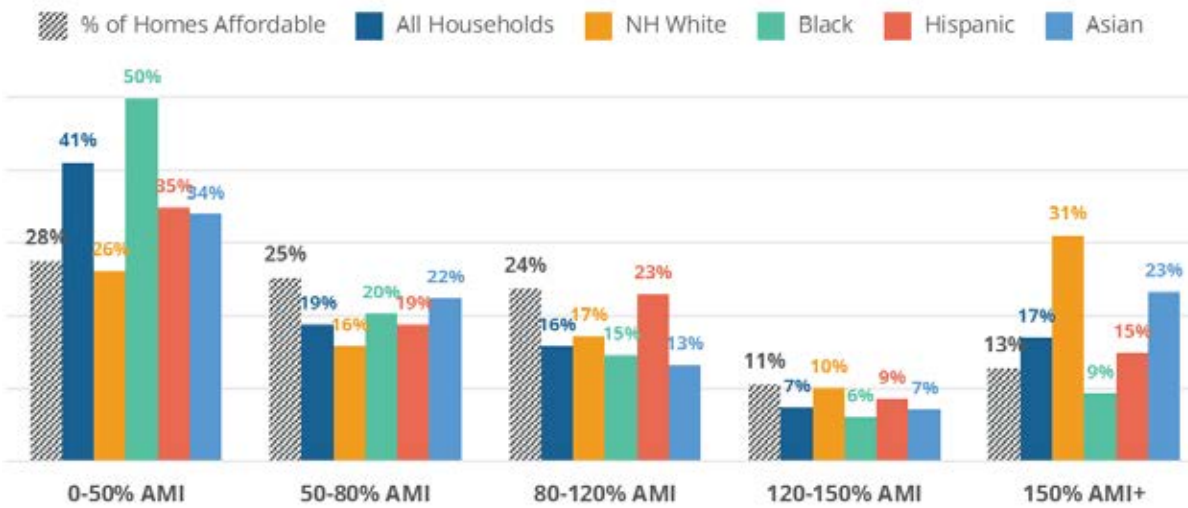
Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

As shown in jurisdictional data presented in Figures V-49 to V-54, income levels affected by shortages of affordable owner-occupied homes differ by jurisdiction in the Baltimore region. Baltimore City's owner-occupied homes are more affordable to its residents than owner-occupied homes are for residents in all other jurisdictions: the city undersupplies owner-occupied homes affordable at 50% AMI or less and oversupplies owner-occupied homes affordable at all other income levels.

Note that the city's Black or African American residents have very low and extremely low incomes at the highest rate and are most affected by differences in affordable for sale homes. The high affordability in Baltimore City relative to other jurisdictions drives African American homebuyers into the city.

**Figure V-49.**  
**Purchase Affordability by Race and Ethnicity, Baltimore City, 2022-24**

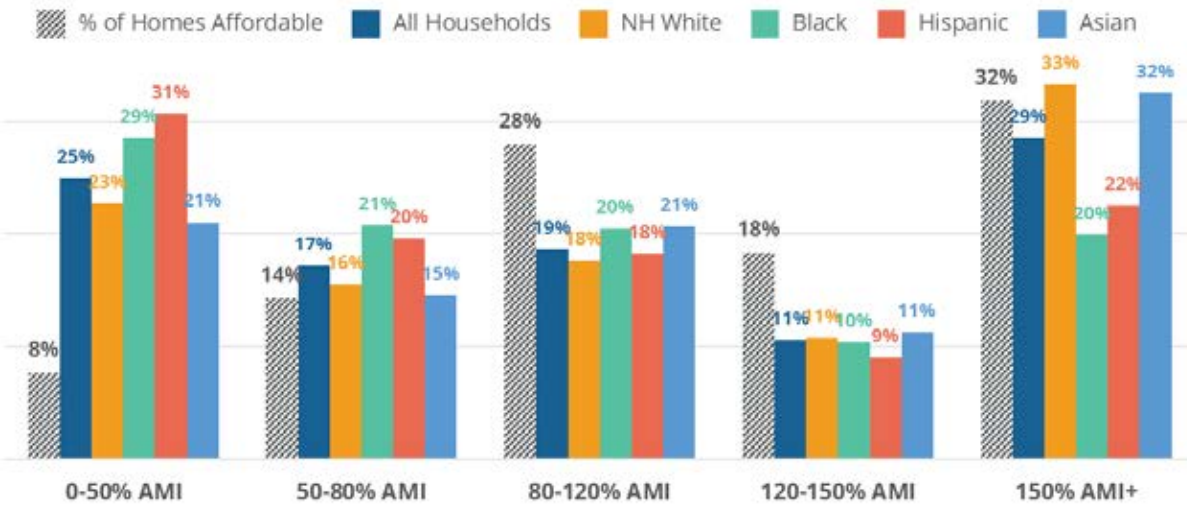


Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

Baltimore County and Harford County’s owner-occupied homes are less affordable to their residents, with smaller shares of ownership units affordable at 0-50% AMI and 50-80% AMI than shares of households at these income levels. In Baltimore County, Black or African American and Hispanic households are most likely to earn these incomes and are most affected by these shortages. In Harford County, Black or African American residents earn incomes below 80% AMI at the greatest rate and are most affected by these shortages.

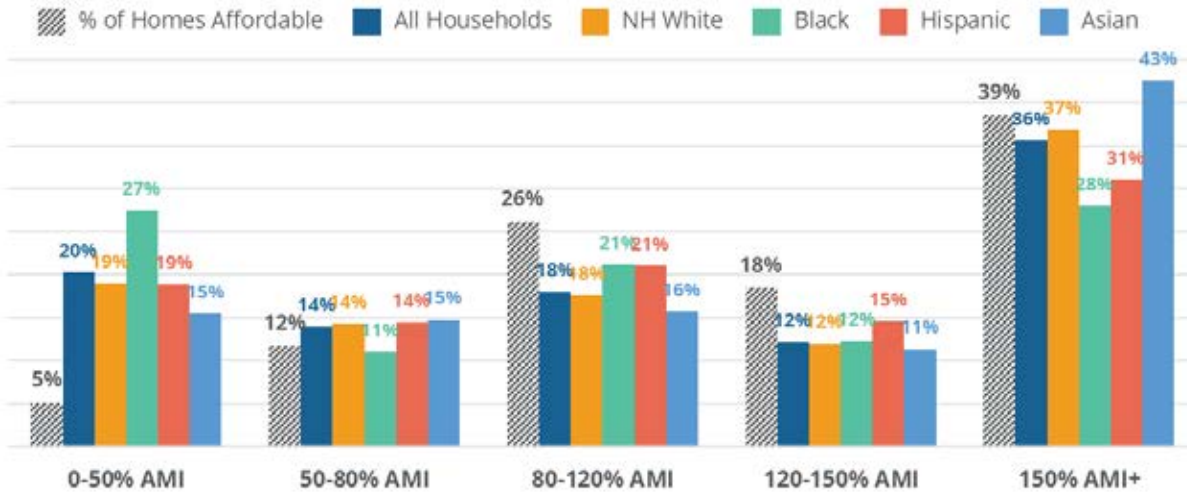
**Figure V-50.**  
**Purchase Affordability by Race and Ethnicity, Baltimore County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

**Figure V-51.**  
**Purchase Affordability by Race and Ethnicity, Harford County, 2022-24**



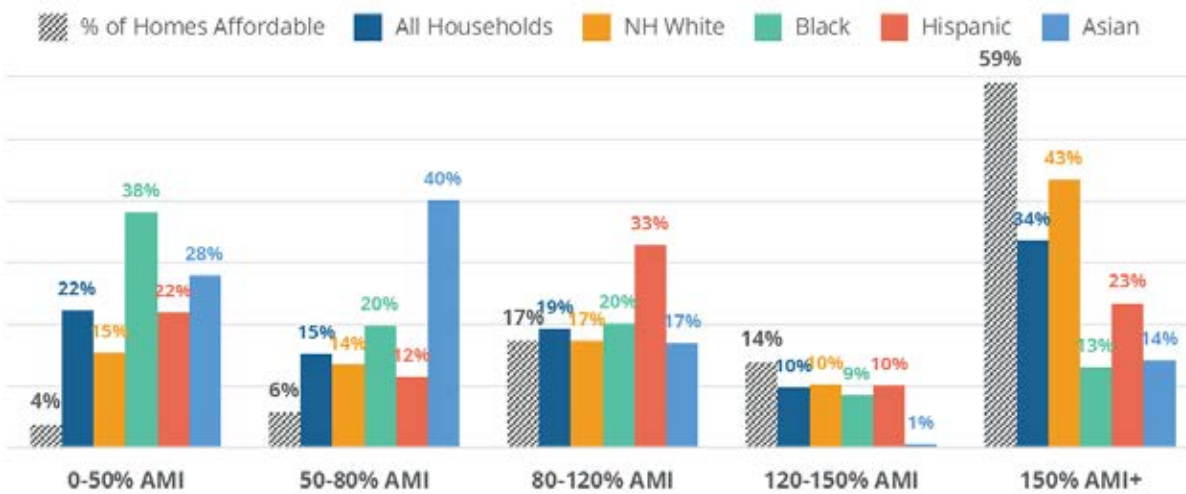
Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.



Annapolis, Anne Arundel County, and Howard County have the least affordable owner-occupied homes for their residents. In these jurisdictions, affordable supply shortages affect households earning 0-50% AMI, 50-80% AMI, and 80-120% AMI (\$74,320 to \$111,480 in 2024). African American or Black and Hispanic households are most likely to earn these incomes in Anne Arundel County and Howard County. Data show Asian households to be most likely to earn these incomes in Annapolis, but as these data are subject to large margins of error, it should be noted that Black or African American households also earn these incomes at high rates and are disproportionately affected by shortages in Annapolis.

**Figure V-52.**  
**Purchase Affordability by Race and Ethnicity, Annapolis, 2022-24**

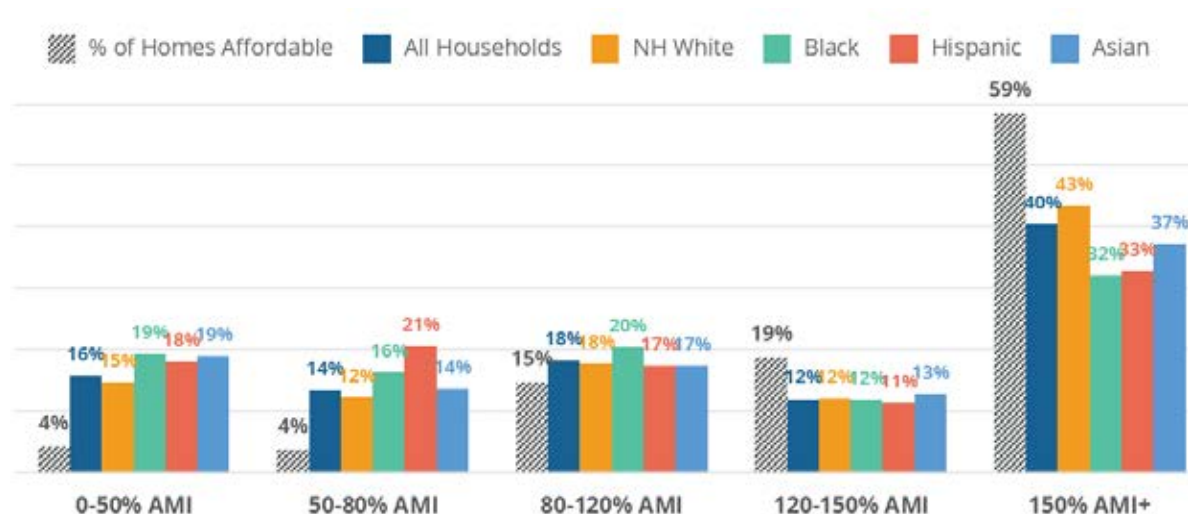


Note: Income distribution of Asian households in Annapolis is subject to large margins of error.

Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

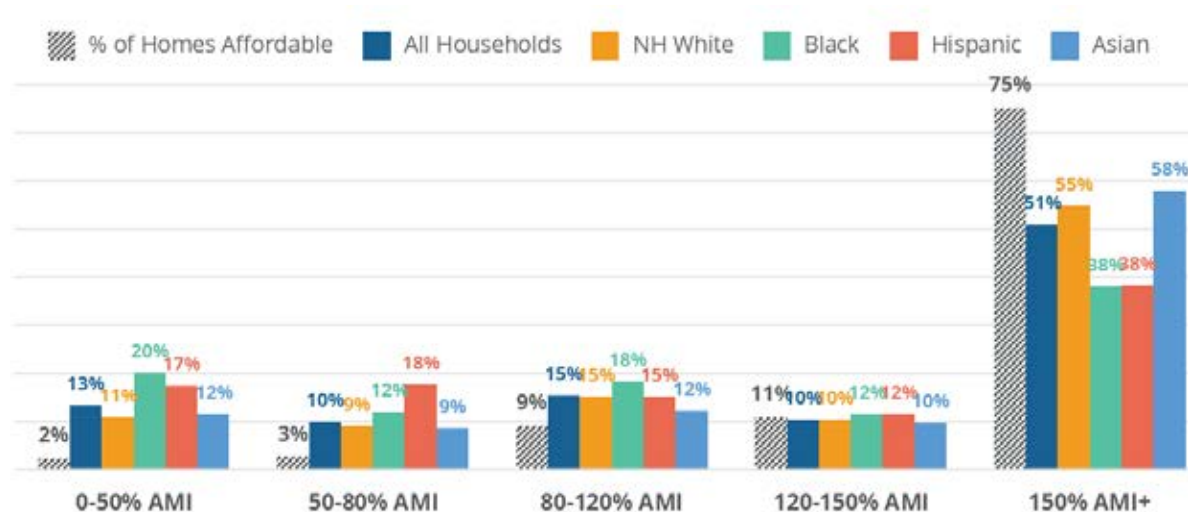
**Figure V-53.**  
**Purchase Affordability by Race and Ethnicity, Anne Arundel County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

**Figure V-54.**  
**Purchase Affordability by Race and Ethnicity, Howard County, 2022-24**



Note: Affordability calculations assume that households pay no more than 30% of their monthly gross income for housing costs. Assumes a 10% downpayment on a 30-year mortgage at a rate of 6.81%, with an additional 30% of the monthly payment to property taxes, utilities, insurance, etc.

Source: 2022 1-year ACS (% of Homes Affordable), 2022 5-year ACS (Households by Race/Ethnicity), HUD AMIs, and Root Policy Research.

Jurisdictional variations in home purchase affordability are partially attributable to jurisdictional zoning differences. In determining the density of development allowed, zoning affects the types of residential structures that make up a given area's housing stock. Baltimore City, shown above to offer the most affordable ownership options to its residents, accounts for nearly 70% of the region's land zoned for high density housing and has an owner-occupied housing stock comprised mostly of attached units, which helps provide more affordable ownership opportunities. By contrast, Anne Arundel and Howard Counties—the two least affordable counties for homeownership in the region—together constitute approximately three quarters of all land in the region zoned for very low density housing. Their owner-occupied housing stocks consist mostly of single family detached homes, which tend to be more expensive than attached homes.

## Housing Problems: Cost Burden and Homelessness

Cost burden exists when households pay more than 30% of their gross household income in housing costs. Housing costs include the rent or mortgage payment, utilities, renter or homeowner insurance, and property taxes.

Severe cost burden—paying more than 50% of monthly gross income on a household rent or mortgage—is an indicator of critical housing needs. Severe cost is also linked to a high risk of eviction or foreclosure, and homelessness.



The number of households in the region who experience severe cost burdened is close to 140,000, with large differences among jurisdictions:

- In Baltimore City, 49,000 households are severely cost burdened;
- In Annapolis, 3,000 households are severely cost burdened;
- Anne Arundel County has more than 21,000 households who are severely cost burdened;
- Baltimore County has 44,000;
- Howard County has 12,000; and
- Harford County has almost 11,000 households who are severely cost burdened.

**Cost burden by race and familial status.** The following figure compares the proportion of households experiencing severe cost burden, based on data from HUD's Affirmatively Furthering Fair Housing (AFFH) Table 10 and the Comprehensive Housing Affordability Strategy (CHAS) data. The figure shows severe cost burden by race, ethnicity, and family status, for each jurisdiction in the study area.

**Figure V-55.**

**Share of Households Experiencing Severe Cost Burden (HUD Table 10) by Household Characteristics**

	White, Non-Hispanic	Black, Non-Hispanic	Hispanic	Asian or Pacific Islander, Non-Hispanic	All Households	Families with < 5 People	Families with > 5 People (Large)	Non-related and Single Households
Region	12%	19%	17%	13%	15%	11%	10%	21%
Anne Arundel	11%	12%	14%	11%	11%	9%	8%	18%
Annapolis	14%	20%	27%	18%	17%	13%	7%	22%
Baltimore City	14%	24%	21%	18%	20%	18%	17%	23%
Baltimore County	13%	16%	17%	15%	14%	10%	9%	22%
Harford County	11%	18%	18%	13%	12%	9%	9%	20%
Howard County	9%	16%	11%	11%	11%	8%	9%	19%

Note: Severe housing cost burden is defined as housing costs that are greater than 50 percent of income.

Source: HUD CHAS dataset using ACS 2016-2020. Refer to <https://egis.hud.gov/affht/> for more details.

Regionwide, severe cost burden is highest for:

- Single occupant households (21% are severely cost burdened);
- Black non-Hispanic households (19%); and
- Hispanic households (17%).

Severe cost burden is lowest for non-Hispanic White households (12%), families with less than five people (11%) and large families (10%).

By jurisdiction,

- Severe cost burden is highest in Annapolis and Baltimore City, despite their high supply of publicly assisted housing, because of the disproportionately high rates of poverty in those jurisdictions. Most notable is Annapolis' very high rate of severe cost burden for Hispanic residents at 27% and Baltimore City's high rate of severe cost burden for Black residents at 24%.
- Severe cost burden is lowest in Howard and Anne Arundel Counties. Because cost burden is related to income levels and Howard and Anne Arundel are relatively

affluent counties, they have the lowest severe cost burden for every racial, ethnic, and household group.

**Cost burden by age.** Figure V-56 and V-57 supplement the HUD tables with severe cost burden by age range. They show the proportions of households who experience cost burden 35% and greater (“moderate to severe” cost burden), rather than 50% and greater, due to data limitations. As the tables demonstrate, moderate to severe cost burden is highest for the youngest and oldest households in the region.

It is important to put the higher level of cost burden among seniors in context: higher cost burden is generally easier for seniors to manage because other household expenses are lower than those of other age cohorts, especially households with young children (e.g., seniors receive health care subsidies, do not have childcare costs. This, of course, is not as true for seniors raising grandchildren, especially if they are still in the workforce.) In addition, the cost burden measure does not account for personal assets and wealth, which some seniors have access to through retirement and pension funds. As such, in housing policy, senior cost burden is generally less of a concern than for younger households, especially households with children, where cost burden can serve as a long term barrier to economic opportunity.

**Figure V-56.**  
**Moderate to Severe Cost Burden by Age, 2017**

Note:

This table shows cost burden of 35% and greater, rather than 50% and greater. These data are pulled from the Census, which does not provide a 50% measure.

Source:

2017 5-year ACS and Root Policy Research.

	Age 15-24	Age 25-34	Age 35-64	Age 65+
Region	53%	37%	38%	52%
Anne Arundel	53%	36%	32%	51%
Annapolis	37%	32%	38%	47%
Baltimore City	59%	40%	44%	46%
Baltimore County	52%	36%	36%	58%
Harford County	42%	42%	39%	48%
Howard County	42%	29%	34%	58%

Figure V-57 shows moderate to severe cost burden by age in 2022. Compared to 2017, cost burden among renters ages 15-24 has grown across the region. Annapolis had the largest growth in moderate to severe cost burden from 37% in 2017 to 76% in 2022. Note that this group is relatively small compared to other jurisdictions at 533.

Baltimore County also saw growth in cost burden for young renters, rising by 11 percentage points from 52% in 2017 to 63% in 2022 and Howard County rates rose by nine percentage points. Harford County was the only county to see a noticeable decrease in cost burden for those ages 15-24, decreasing from 42% in 2017 to 28% in 2022.

**Figure V-57.**  
**Moderate to Severe Cost Burden by Age, 2022**

Note:

This table shows cost burden of 35% and greater rather than 50% and greater. These data are pulled from the Census which does not provide a 50% measure..

Source:

2022 5-year ACS and Root Policy Research.

	Age 15-24	Age 25-34	Age 35-64	Age 65+
Region	56%	37%	39%	51%
Anne Arundel	56%	36%	34%	48%
Annapolis	76%	28%	37%	42%
Baltimore City	60%	40%	43%	47%
Baltimore County	63%	38%	39%	54%
Harford County	28%	33%	39%	45%
Howard County	51%	27%	36%	52%

Figure V-58 compares the share of cost burdened households in each jurisdiction to the overall share of households in the region. The comparison demonstrates that the City of Baltimore absorbs more of the region's severely cost burdened households than its share of households, while surrounding counties absorb less. This is related, in part, to the larger presence of lower income households in Baltimore City: Severe cost burden afflicts very low income households more than moderate and high income households because of the shortage of affordable housing. Low income households are more likely than moderate and certainly high income households to "rent up" in price because they have no other choice.<sup>12</sup> Compared to 2017, Baltimore City's proportion of severely cost burdened households in the region has increased while all surrounding counties have decreased or stayed the same.

**Figure V-58.**  
**Share of Severely Cost Burdened Households v. All Households, by Jurisdiction**

	Baltimore City	Anne Arundel County	Baltimore County	Harford County	Howard County
Share of region's cost burdened households	40%	13%	33%	5%	9%
Total households (all)	247,232	221,704	328,611	98,822	119,230
Share of all households in the region	24%	22%	32%	10%	12%
<i>Difference</i>	16%	-9%	1%	-5%	-3%

Source: 2022 5-year ACS and Root Policy Research.

**Disparities in the experience of homelessness.** The most severe consequence of severe cost burden is homelessness, and, in the Baltimore region, the risk of homelessness is unequal among racial and ethnic groups, even after adjusting for poverty. In the region overall, 68% of individuals experiencing homelessness are African

<sup>12</sup> Moderate and high income households may "rent up" or "buy up" to live in a particular neighborhood, as an investment strategy, because they receive parental support, etc.



American, 33% are White, 4% are other races, and 5% are Hispanic.<sup>13</sup> This compares the region's residents living below the poverty line who are 51% African American; 34% White, 10% other races; and 8% Hispanic. In sum, African Americans are overrepresented among homeless individuals in the Baltimore region, even after accounting for poverty, while other racial and ethnic groups are underrepresented. African American residents are overrepresented in the homeless population relative to their shares of the population in poverty in all jurisdictions except for Baltimore City, and the difference is particularly large—a gap of 17 percentage points or more—in Baltimore County and Howard County:

- In Baltimore County, African Americans make up 37% of persons living in poverty v. 58% of persons experiencing homelessness;
- In Howard County, African American residents make up 46% of persons living in poverty v. 63% of persons experiencing homelessness;
- In Anne Arundel County, African Americans make up 28% of persons living in poverty v. 43% of persons experiencing homelessness;
- In Harford County, African American residents make up 25% of persons living in poverty v. 39% of persons experiencing homelessness; and
- African American residents constitute 73% of persons living in poverty and persons experiencing homelessness in Baltimore City.

Relative to poverty, Asian residents are highly under-represented in homelessness in Howard County and White residents are highly under-represented in Baltimore County and Harford County. Equally concerning is the disproportionate share of African Americans among homeless families with children. This disparity appears in all jurisdictions:

- In the region overall, African American families make up 51% of families living in poverty but 68% of homeless families;
- In Anne Arundel County, African American families make up 28% of all families living in poverty v. 48% in homelessness;
- In Baltimore City, African American families make up 73% of all families living in poverty v. 83% of all homeless families;
- In Baltimore County, African American families make up 37% of all families living in poverty v. 82% in homelessness;

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<sup>13</sup> CofC Racial Equity Analysis Tool developed by HUD, 2023. Harford County data from 2022.

- In Harford County, African American families make up 25% of all families living in poverty v. 54% in homelessness; and
- In Howard County, African American families make up 46% of all families living in poverty v. 72% in homelessness.

The figures below summarize these disparities.<sup>14</sup>

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<sup>14</sup> Data in the tool is based on homelessness and poverty counts at the local level. The data shown draw on the 2023 Point-in-Time (PIT) count data and the Annual Homeless Assessment Report (AHAR) for the U.S. Congress. Harford County homeless counts come from 2022. The data use the definitions of homelessness of:

- privately operated shelter designed to provide temporary living arrangement”—including congregate shelters, transitional housing, hotels and motels paid for by charitable organizations.
- People experiencing unsheltered homelessness are defined as “an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.”

**Figure V-59.**  
**Race and Ethnicity of Individuals in Poverty v. in Homelessness, 2023**

**ALL INDIVIDUALS IN HOMELESSNESS**



**ALL INDIVIDUALS IN POVERTY**



Note: Homeless data for Harford County from CoFC Racial Equity Analysis 2022

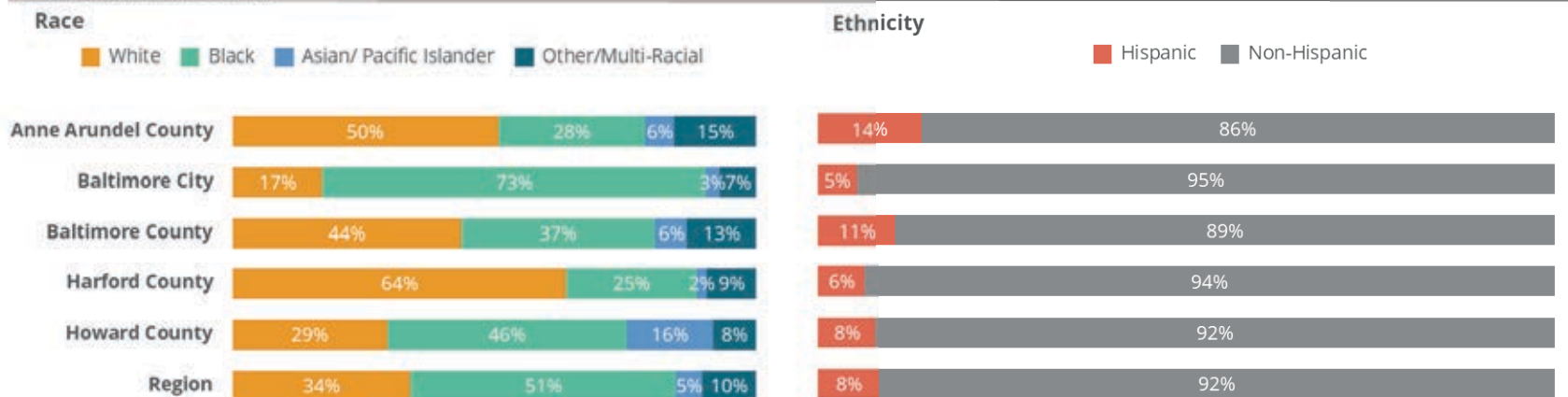
Source: 2022 5-year ACS, CoFC Racial Equity Analysis Tool developed by HUD, 2022 and 2023

**Figure V-60.**  
**Race and Ethnicity of Families in Poverty v. in Homelessness, 2023**

**ALL FAMILIES IN HOMELESSNESS**



**ALL FAMILIES IN POVERTY**



Note: Homeless data for Harford County from CoFC Racial Equity Analysis 2022

Source: 2022 5-year ACS, CoFC Racial Equity Analysis Tool developed by HUD, 2022 and 2023

## Gaps in Attaining Homeownership

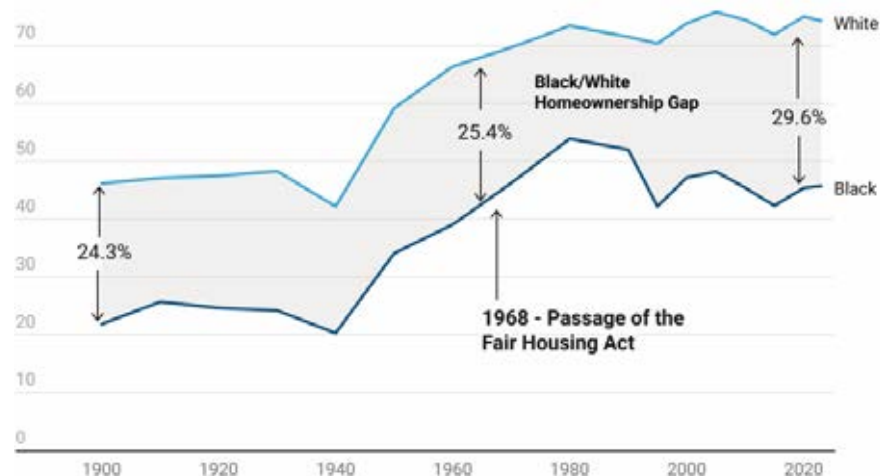
For the majority of households in the U.S., owning a home is the single most important factor in wealth-building. Homeownership is also thought to have broader public benefits, which has justified decades of public subsidies to support ownership. The federal government has subsidized homeownership in various forms for nearly 100 years—yet the subsidies and wealth-building benefits of ownership have been realized by a narrow segment of households.

Due to a long history of racially discriminatory lending practices including redlining and despite the Fair Housing Act's 1968 outlawing of racial discrimination in housing, households of color have not accessed the benefits of homeownership at similar rates as White households. As shown in Figure V-61 below, Black homeownership increased substantially in the 20<sup>th</sup> Century and peaked at 53.9% in 1980 before decreasing to 47.0% by 2020. The national gap in homeownership between Black and White households was wider in 2020 at 29.6% than it was in 1960 (25.4%) and in 1900 (24.3%).<sup>15</sup>

**Figure V-61.**  
**Black/White**  
**Homeownership**  
**Gap, United**  
**States, 1990-2020**

Source:

National Community  
Reinvestment Coalition,  
"Decades of Disinvestment:  
Historic Redlining and Mortgage  
Lending Since 1981"



A recent examination of the commonalities of cities with high rates of African American ownership found two important factors: 1) High levels of advocacy, organizing, and testing that guards against discriminatory practices and treatment; and 2) Inner-ring suburbs that provide attractive alternatives to city living due to good schools, welcoming leadership, and affordability.<sup>16</sup>

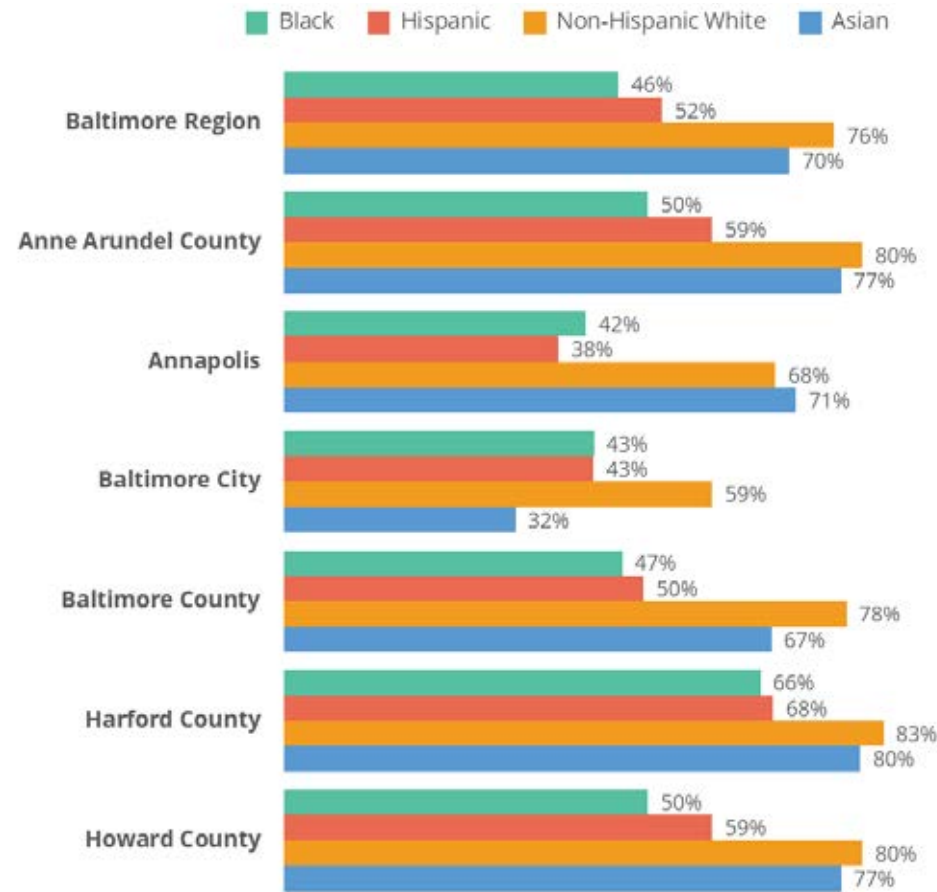
<sup>15</sup> <https://ncrc.org/wp-content/uploads/2024/05/Decades-of-Disinvestment-FINALd.pdf>

<sup>16</sup> <http://www.governing.com/topics/transportation-infrastructure/sl-black-homeownership-norm-in-these-cities.html>

In the Baltimore region, homeownership for African American and Hispanic households is significantly lower than for Non-Hispanic White and Asian households, as shown below. The African American and White disparity is 30 percentage points overall. It is largest in Baltimore County, Anne Arundel County, and Howard County (30-31 percentage point disparity) and smallest in Harford County and Baltimore City. Baltimore City has relatively low homeownership rates overall which is common in urban area core cities.

The Hispanic and White homeownership disparity is 24 percentage points in the region overall. This disparity is larger in Annapolis (30 percentage point difference) and Baltimore County (28 percentage point difference).

**Figure V-62.**  
**Homeownership Rate by Race and Ethnicity, 2022**

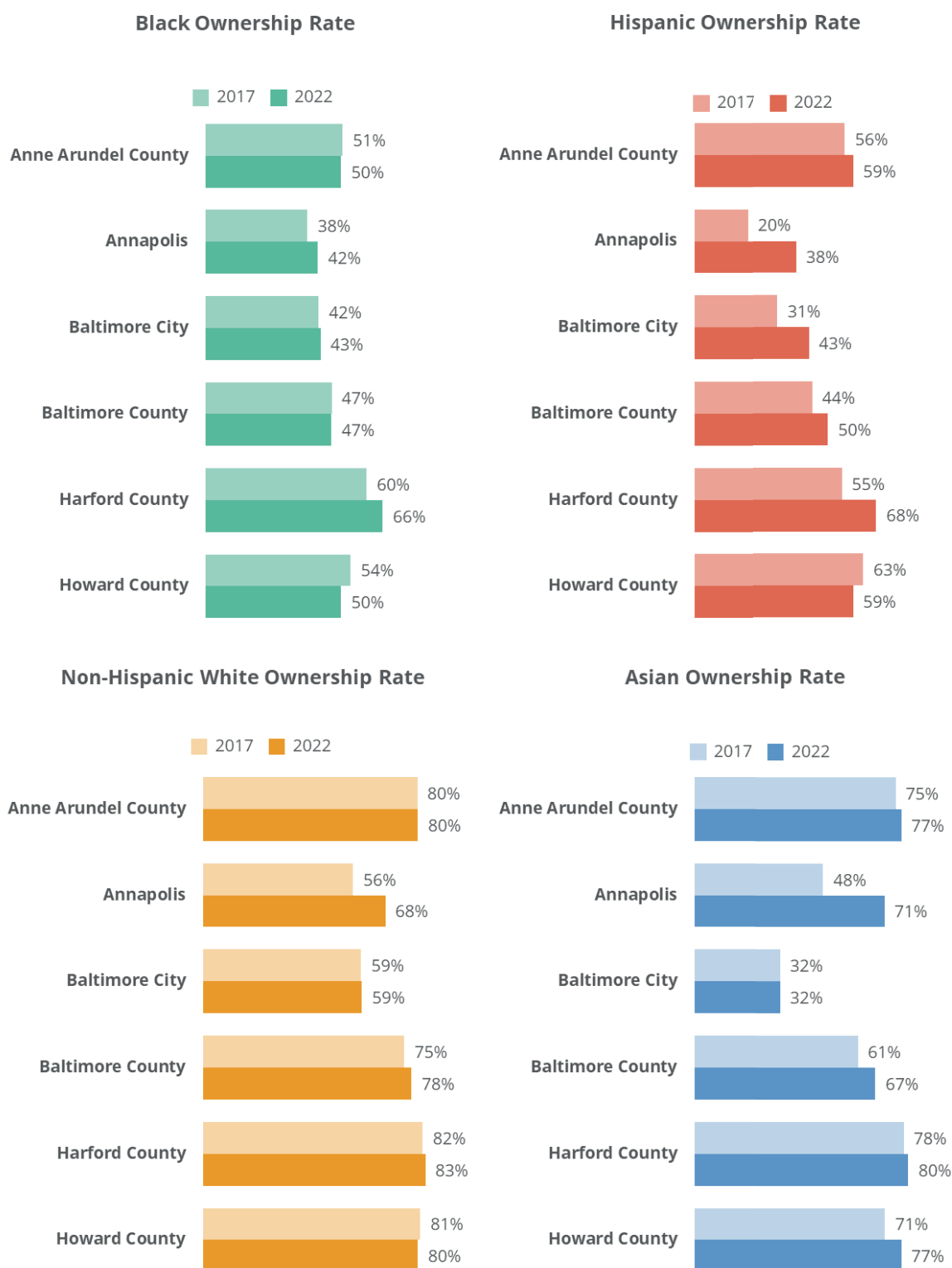


Source: 2022 5-year ACS and Root Policy Research.

Since 2017, Black homeownership has increased in Annapolis by four percentage points and in Harford County by six percentage points but decreased by four percentage points in Howard County. Hispanic homeownership increased across the region with the exception of Howard County. Asian and non-Hispanic White homeownership stayed mostly the same from 2017 to 2022, but both increased in Annapolis.



**Figure V-63.**  
**Homeownership Rate by Race and Ethnicity, 2017 and 2022**



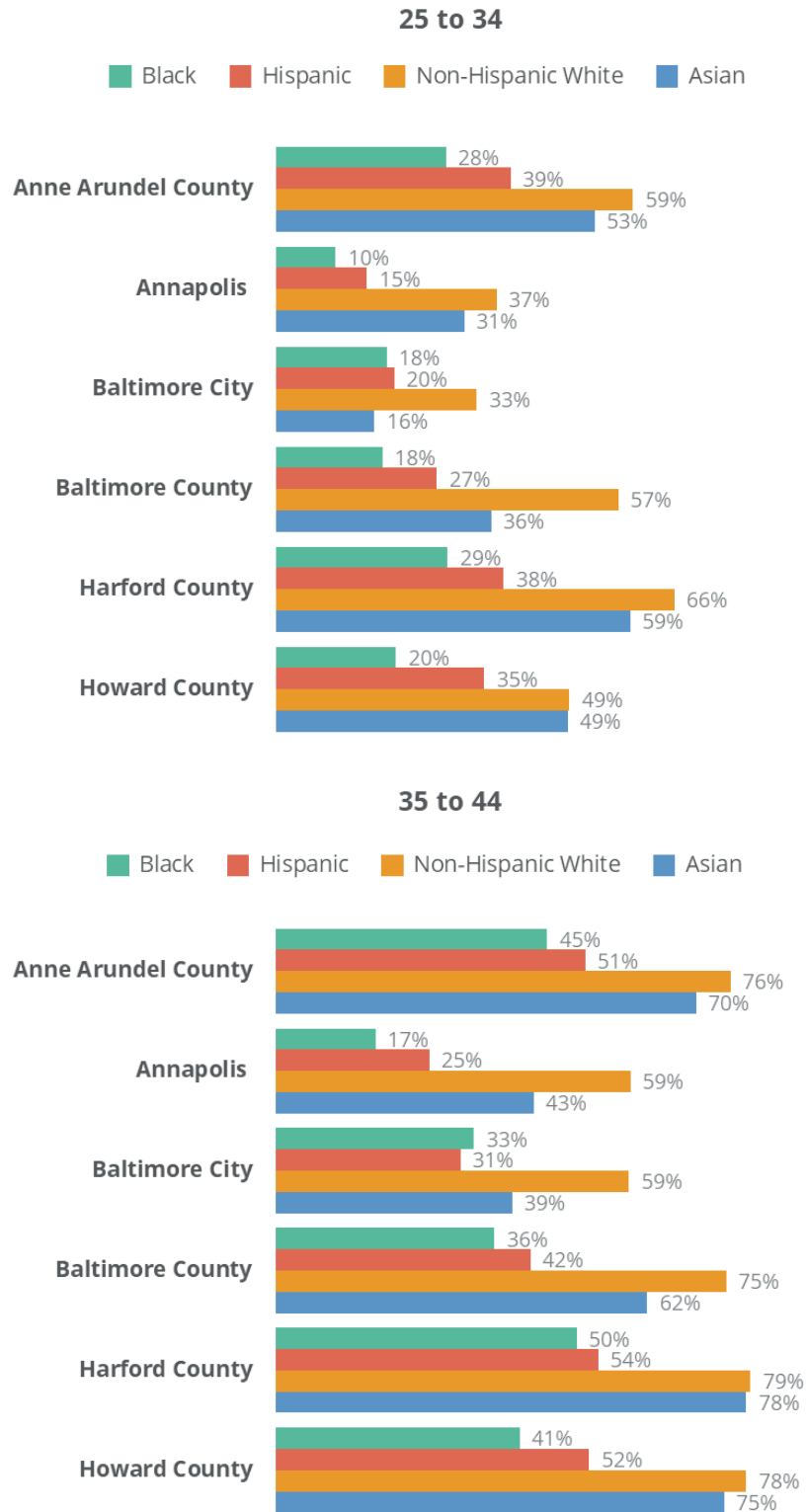
Source: 2022 5-year ACS and Root Policy Research.

Figure V-64 displays the homeownership rate by race and ethnicity, age, and jurisdiction:

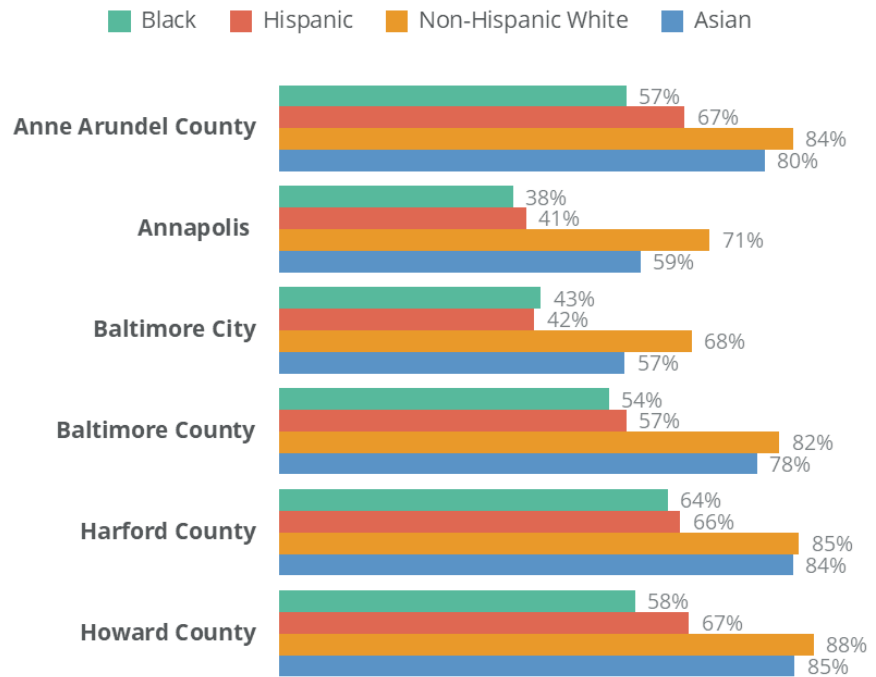
- Those ages 25 to 34 have the lowest ownership rate across all races and jurisdictions. Non-Hispanic White and Asian residents in this age cohort in Harford County and Anne Arundel County have the highest homeownership rates. Black residents in this age cohort have the lowest rate in Annapolis at 10%.
- In the 35 to 44 age cohort, Non-Hispanic White and Asian residents have the highest homeownership rate across jurisdictions. Black residents in this age cohort have the lowest rate across jurisdictions except for Baltimore City.
- The 45 to 64 age cohort have among the highest homeownership rates across jurisdictions and races. Black residents have the lowest homeownership rate across jurisdictions, except for Baltimore City, while Asian and non-Hispanic White residents have the highest.
- Of all Black and Hispanic residents, those ages 65 and older have the highest homeownership rates in Anne Arundel County and Harford County.
- Baltimore City has the most parity among Black and White homeownership rates across ages, but also has among the lowest homeownership rates across races and ages.

**Figure V-64.  
Homeownership  
by Race and  
Ethnicity by Age,  
2020**

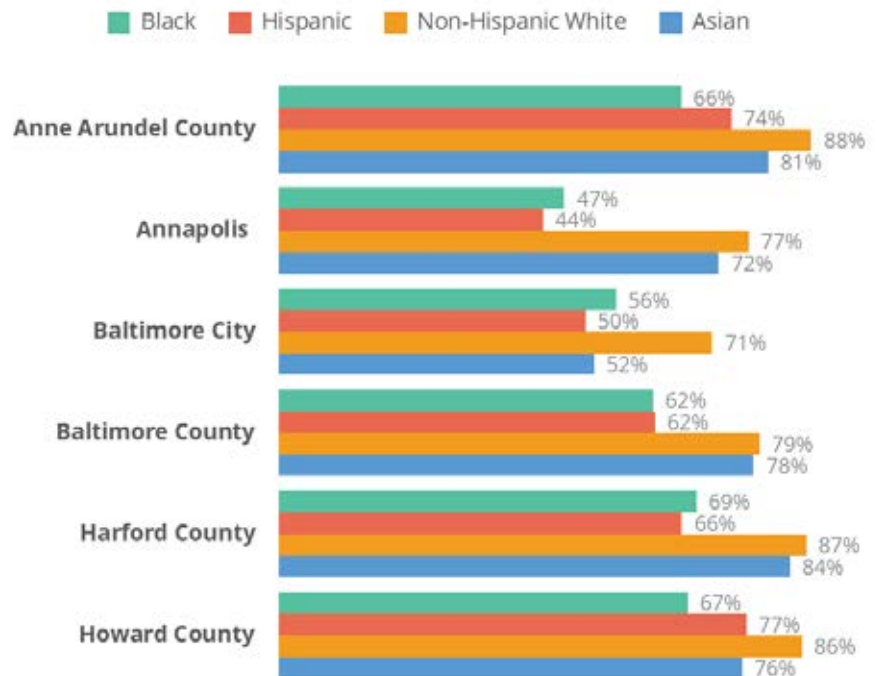
Source:  
2020 U.S. Decennial Census and  
Root Policy Research.



### 45 to 64



### 65+



**Differences in access to credit.** In this section, federal Home Mortgage Disclosure Act (HMDA) data are used to detect differences in mortgage loan originations by the protected classes reported in the data. HMDA data analyzed in this section reflect loans applied for by residents in 2022 and 2023, the latest years for which data are available.

Figure V-65 shows the share of mortgage loan applications that were denied by applicant race and ethnicity. Mortgage lending in the Baltimore Region is characterized by stark differences in denial rates by race and ethnicity: African American applicants are denied at a rate of 26%, nearly double the denial rate for Non-Hispanic White applicants (14%). Mortgage loan applications from Hispanic residents were denied at a rate of 22%. Asian applicants had the second lowest denial rate at 17%.

By jurisdiction:

- The City of Annapolis has the highest rate of denials for African American residents at 30%. Anne Arundel County simultaneously has the lowest denial rate in the region for African American applicants at 22%. African American applicants in Annapolis are more likely to be denied mortgage loans than African American applicants elsewhere in Anne Arundel County.
- Baltimore City also has a relatively high denial rate for African American applicants at 28%.
- Howard County has the highest denial rate for Hispanic applicants at 27% and is one of two jurisdictions wherein Hispanic applicants have a higher mortgage loan denial rate than African American applicants. Hispanic applicants have a slightly higher denial rate than African American applicants in Anne Arundel County.
- Denial rates for Asian applicants do not vary widely by jurisdiction: jurisdictional denial rates for Asian applicants are within one percentage point of the regional denial rate for Asian applicants (17%).
- Non-Hispanic White applicants have the lowest denial rates in all jurisdictions.

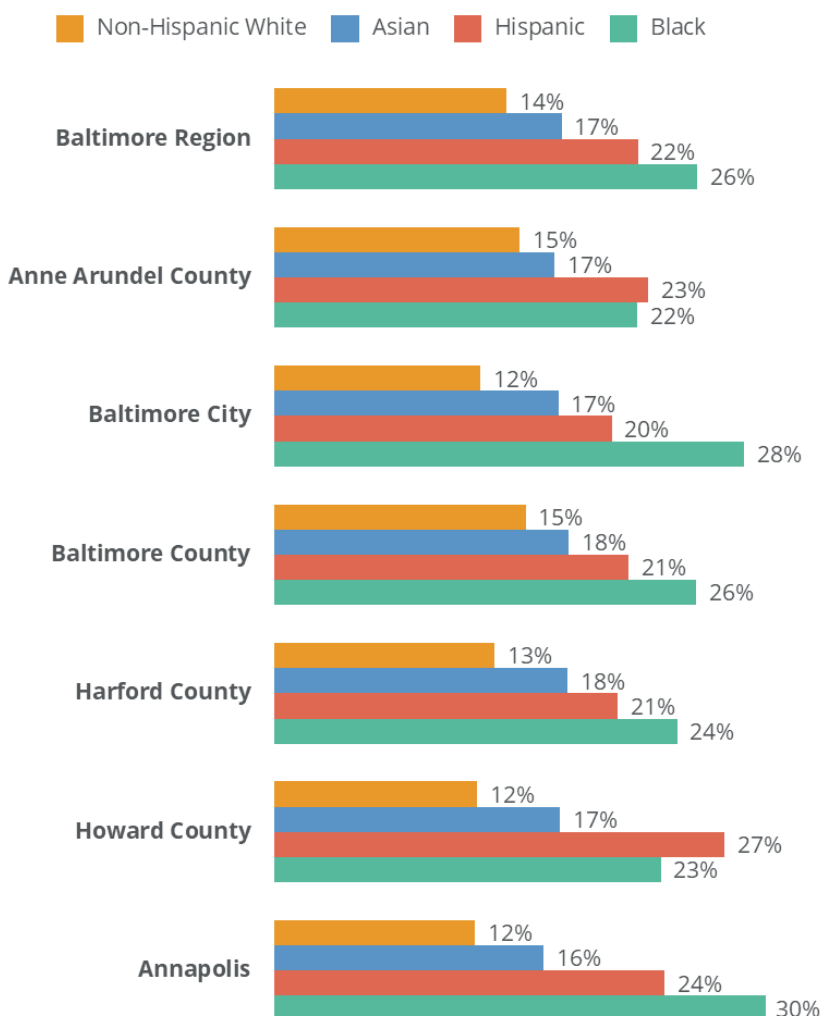
**Figure V-65.  
Mortgage Loan  
Denial Rates by  
Race and Ethnicity,  
Baltimore Region  
and by Jurisdiction,  
2022–2023**

Note:

Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Source:

HMDA 2022-2023 and Root Policy Research.



Current mortgage loan denial rates by race and ethnicity are compared to those from 2017 data presented in the previous AI in Figure V-66. In the region overall, denial rates have remained relatively stable for Non-Hispanic White and African American applicants and increased by three percentage points for Hispanic and Asian applicants since 2017. Notable changes in mortgage denial rates by race and ethnicity since 2017:

- Asian applicants in Howard County saw a substantial increase in their mortgage denial rate (+5%).
- Denial rates for African American applicants fell by 13 percentage points in Annapolis and decreased by 5 percentage points in Baltimore City.
- Hispanic residents saw substantial increases in mortgage denial rates in Annapolis (+11 percentage points), Howard County (+8 percentage points), and Anne Arundel County (+6 percentage points).



- Denial rates remained stable for Non-Hispanic White residents of all jurisdictions.

**Figure V-66.**

**Change in Mortgage Loan Denial Rates by Race and Ethnicity, Baltimore Region and by Jurisdiction, 2017 to 2022–2023**

	Asian	Black/ African American	Hispanic	Non-Hispanic White
<b>2017</b>				
Baltimore Region	15%	26%	19%	13%
Anne Arundel County	17%	23%	17%	13%
Baltimore City	17%	33%	23%	13%
Baltimore County	17%	25%	20%	15%
Harford County	17%	25%	20%	12%
Howard County	12%	22%	19%	11%
Annapolis	n/a	43%	13%	12%
<b>2022-2023</b>				
Baltimore Region	17%	26%	22%	14%
Anne Arundel County	17%	22%	23%	15%
Baltimore City	17%	28%	20%	12%
Baltimore County	18%	26%	21%	15%
Harford County	18%	24%	21%	13%
Howard County	17%	23%	27%	12%
Annapolis	16%	30%	24%	12%
<b>Change 2017 to 2022-2023</b>				
Baltimore Region	3%	-1%	3%	1%
Anne Arundel County	0%	-1%	6%	1%
Baltimore City	0%	-5%	-3%	0%
Baltimore County	1%	1%	2%	0%
Harford County	1%	-1%	0%	1%
Howard County	5%	2%	8%	1%
Annapolis	n/a	-13%	11%	0%

Note: Insufficient applications were filed for Asian applicants in Annapolis in 2017.

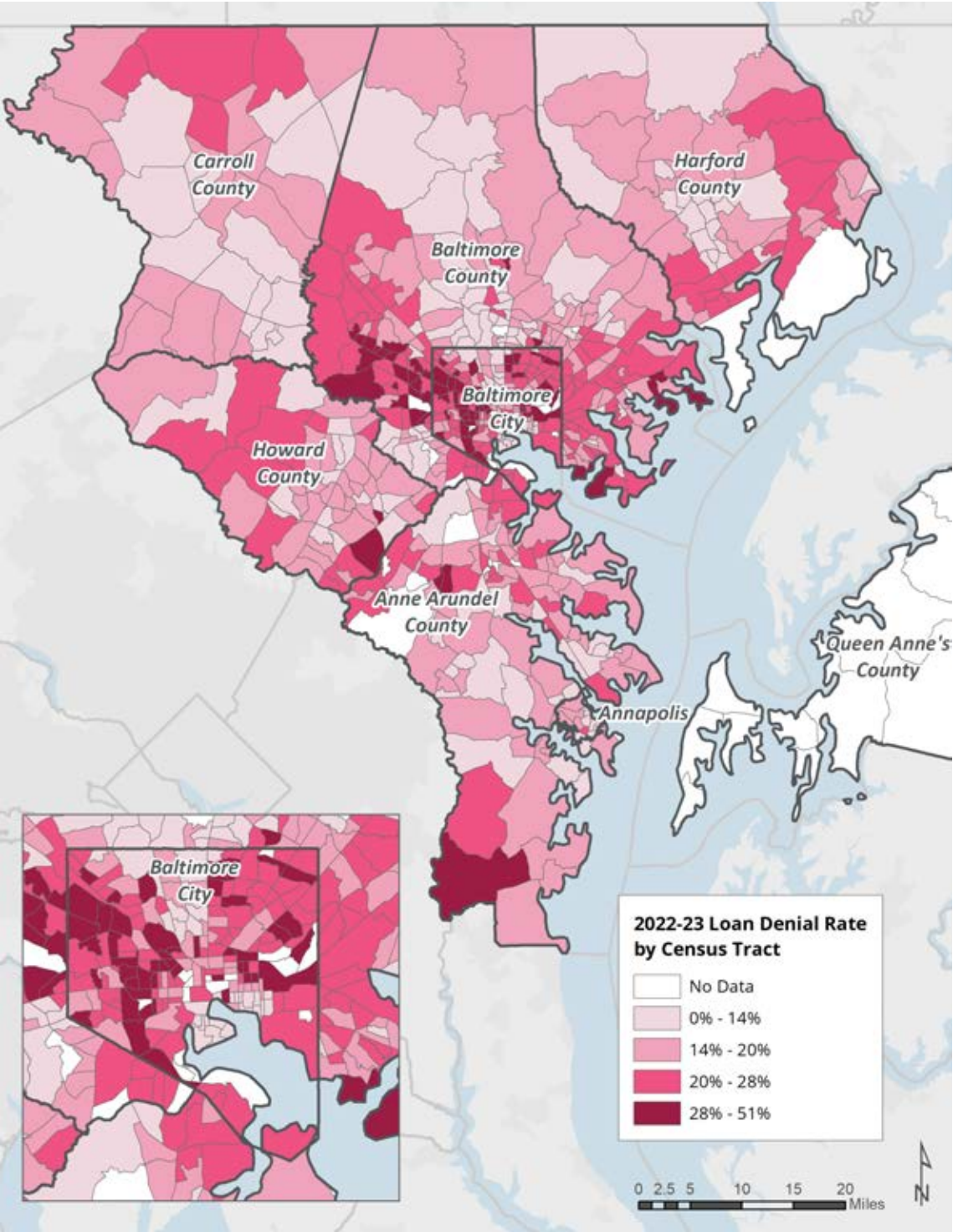
Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Source: HMDA 2017, 2022, and 2023 and Root Policy Research.

Figure V-67 shows mortgage loan denial rates by Census tract using 2022–2023 data. High denial areas are heavily concentrated in west and east Baltimore City and southwestern Baltimore County.

As demonstrated by the map on African American concentrations from Section I (Figure V-68), high denial areas in Baltimore City and Baltimore County frequently coincide with high concentrations of African American residents. The pattern is somewhat less pronounced in the surrounding counties.

**Figure V-67.**  
**Residential Property Loan Denials, 2022–2023**

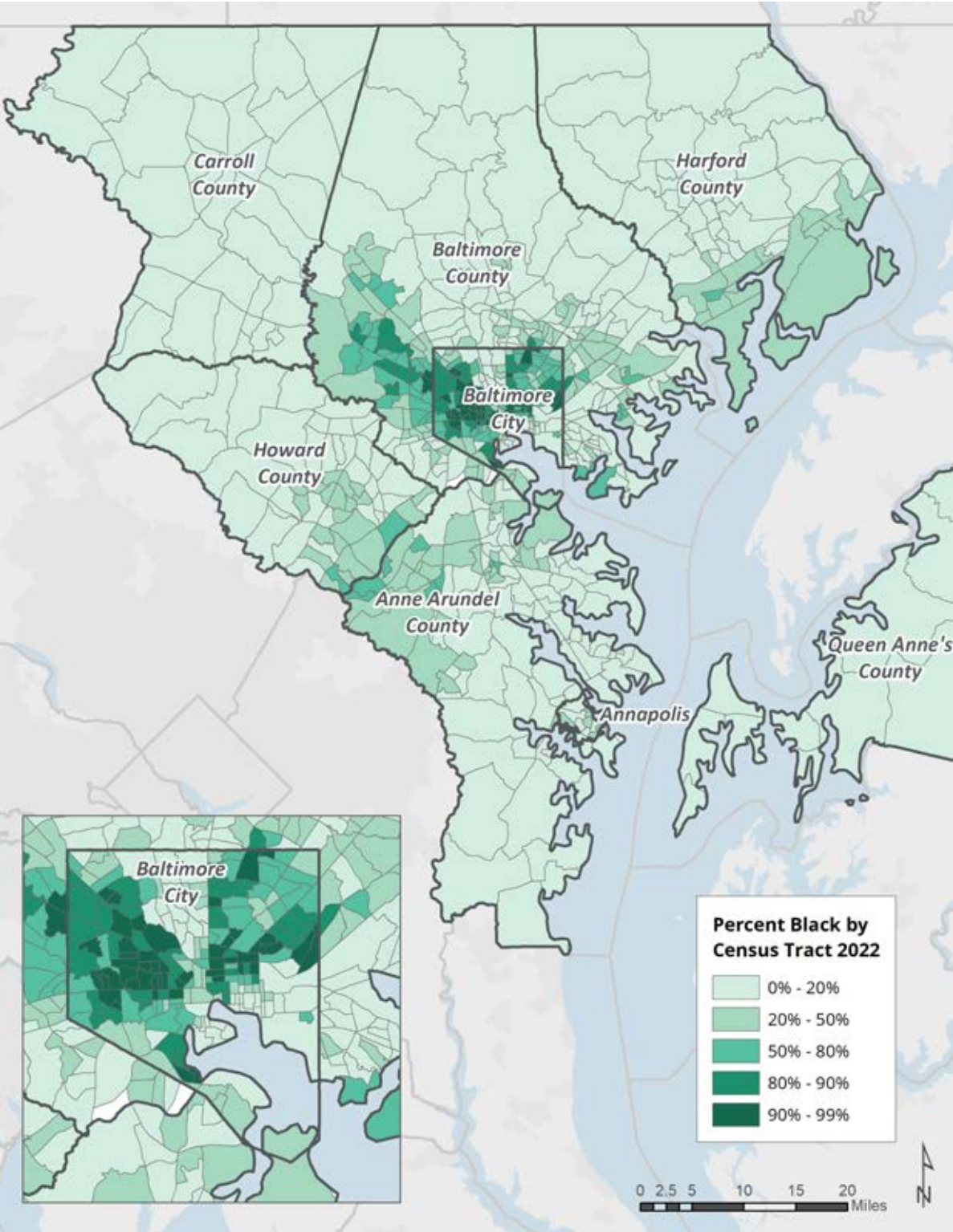


Note: "No data" tracts had fewer than 25 total loan applications in 2022 and 2023.

Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Source: HMDA 2022-2023 and Root Policy Research.

**Figure V-68.**  
**Percent African American by Census Tract, 2022**



Source: 2022 5-year ACS.



Racial and ethnic disparities in loan denial rates are additionally present within all applicant age groups, as shown in Figure V-69. African American and Hispanic applicant denial rates track up to borrowers who are 55 years and older—at which point Black/African American denials grow larger than Hispanic denials. The gap in denial rates between African American and Non-Hispanic White applicants is greatest for applicants aged 75 and older: 45% of applications from African American applicants in this age group were denied, a rate 22 percentage points higher than the 23% of applications from Non-Hispanic White applicants in this age group that were denied.

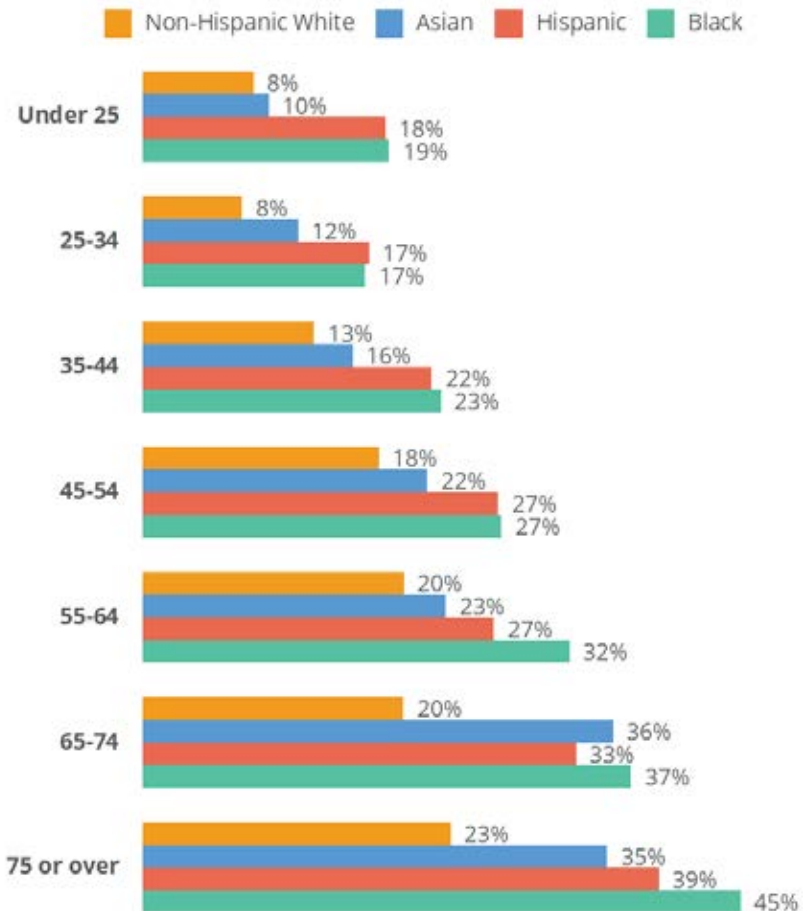
**Figure V-69.**  
**Mortgage Loan**  
**Denials by Race and**  
**Ethnicity and Age,**  
**Baltimore Region,**  
**2022-2023**

Note:

Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Source:

HMDA 2022-2023 and Root Policy Research.

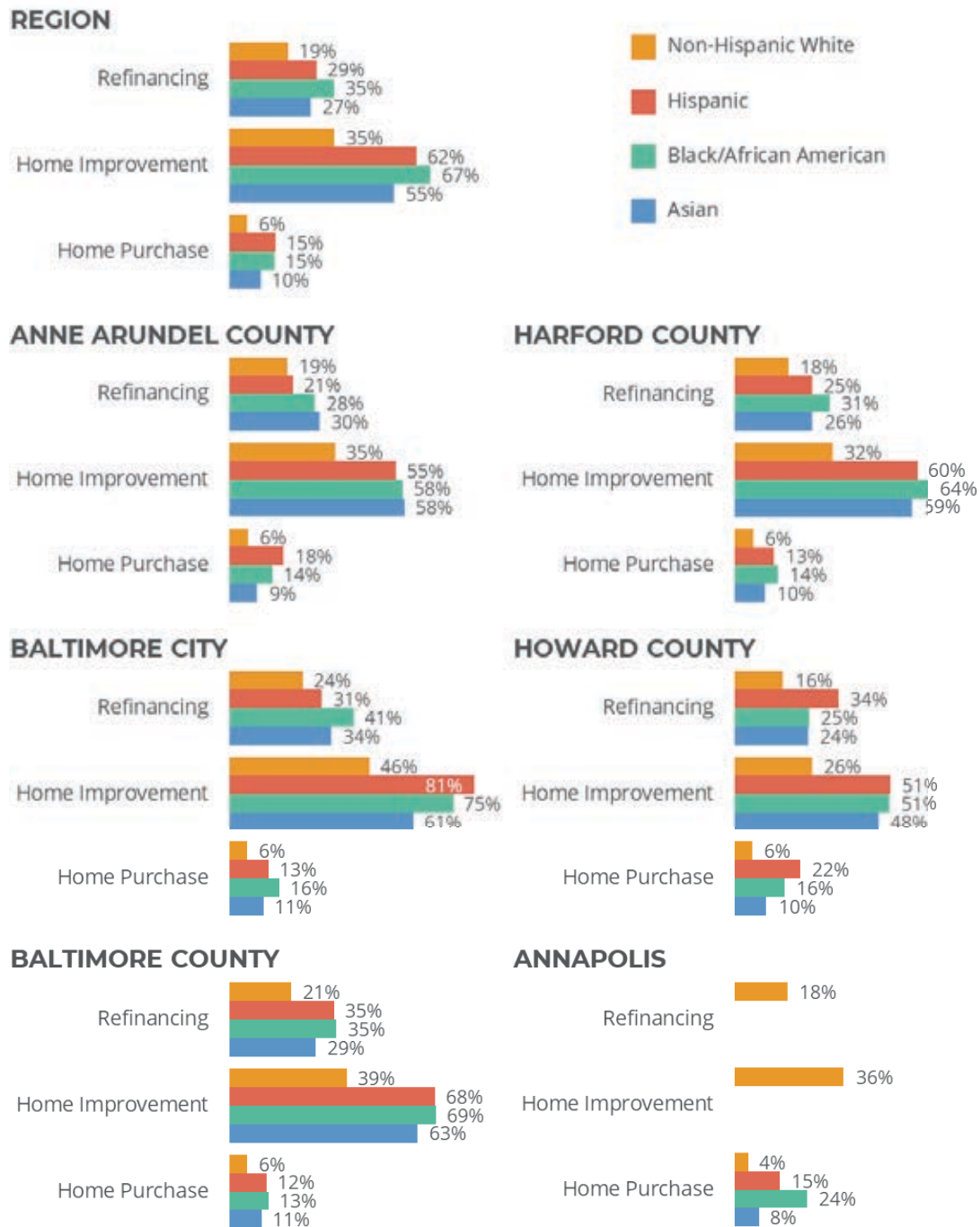


Loan denial rates can also vary by race and ethnicity based on the type of loans applied for by applicants, as shown in Figure V-70. Denial rates are typically highest for home improvement loans, often because the additional debt will raise the loan to value ratios above the levels allowed by a financial institution. Gaps in home improvement denials are large in the region overall (32 percentage points between African American/White applicants and 27 percentage points between Hispanic/White applicants) and in each jurisdiction with data available.

In 2022 and 2023, African American applicants and Hispanic applicants were denied home purchase loans at over twice the rate of Non-Hispanic White applicants in the region and in

each jurisdiction. Gaps were especially severe for African American applicants in Annapolis where they were denied home purchase loans at six times the rate of Non-Hispanic White applicants. Hispanic applicants have home purchase loan denial rates over three times as high as Non-Hispanic White residents in Howard County and Annapolis.

**Figure V-70.**  
**Denial Rate by Race/Ethnicity and Loan Type, 2022–2023**



Note: Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Too few home improvement and refinancing loan applications from African American, Hispanic, and Asian applicants in Annapolis to show data.

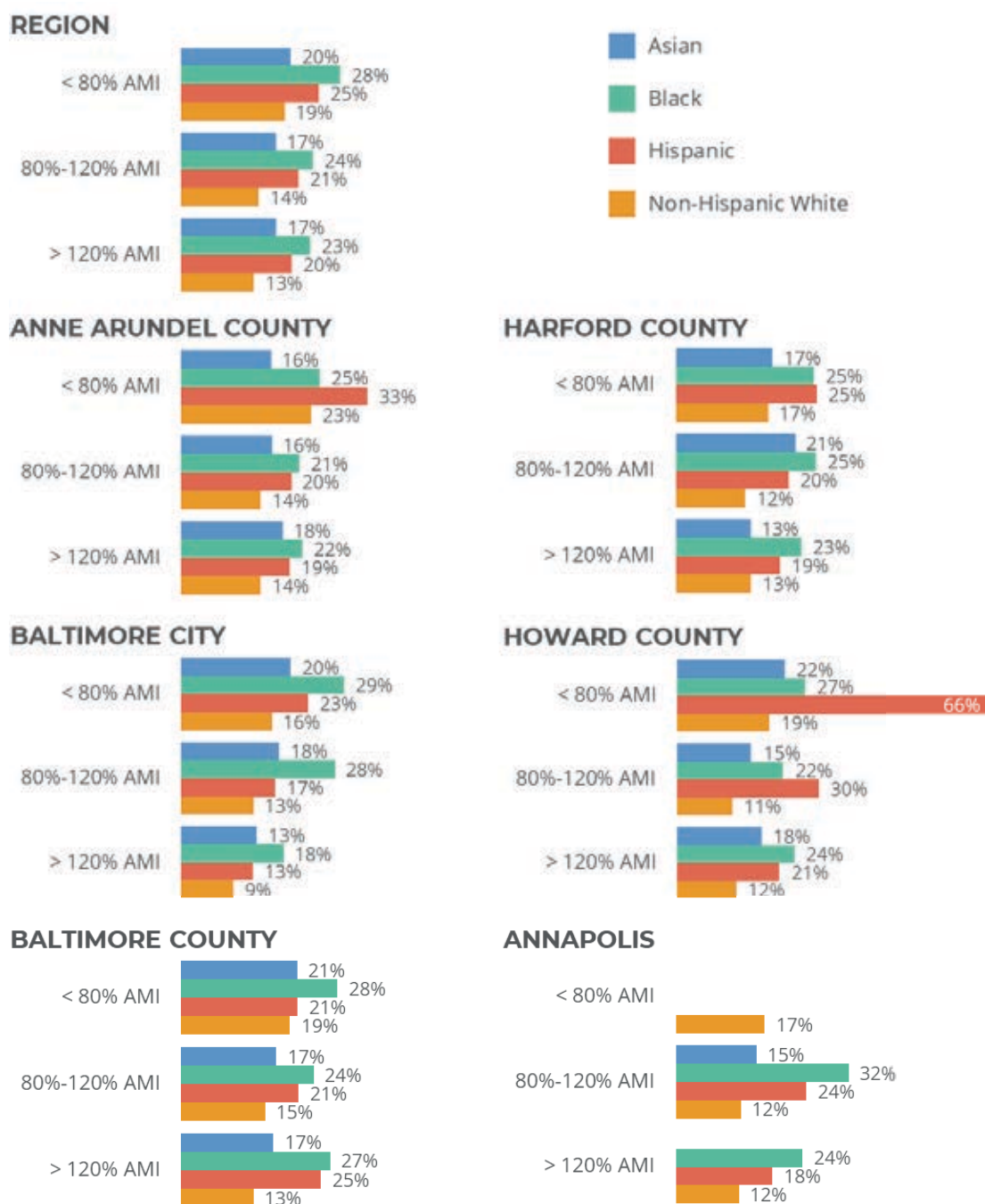
Source: HMDA 2022–2023 and Root Policy Research.



Figure V-71 shows denial rates by race, ethnicity, and income to identify whether racial and ethnic differences in applicant qualifications drive the racial and ethnic disparities in loan denial rates discussed earlier. Although income is not a factor in credit scores, it can be used as a proxy to standardize the qualifications of applicants. A narrowing of the disparities in loan approvals should occur when income is considered. This is not the case in the Baltimore region, however: at the regional level, Non-Hispanic White applicants with incomes at less than 80% AMI have lower denial rates than African American and Hispanic applicants earning 120% AMI or more. This is also the case in Baltimore County, Harford County, Howard County, and Annapolis.

African American applicants earning 120% AMI or more have higher denial rates than Non-Hispanic White applicants earning 80% AMI or less in Baltimore City, while the city's high-income Hispanic households have lower denial rates than low-income Non-Hispanic White residents. Anne Arundel County is the only jurisdiction in which Non-Hispanic White applicants earning 80% AMI or less are denied at higher rates than African American and Hispanic residents earning 120% AMI or more.

**Figure V-71.**  
**Denial Rate by Race/Ethnicity and Applicant Income, 2022–2023**



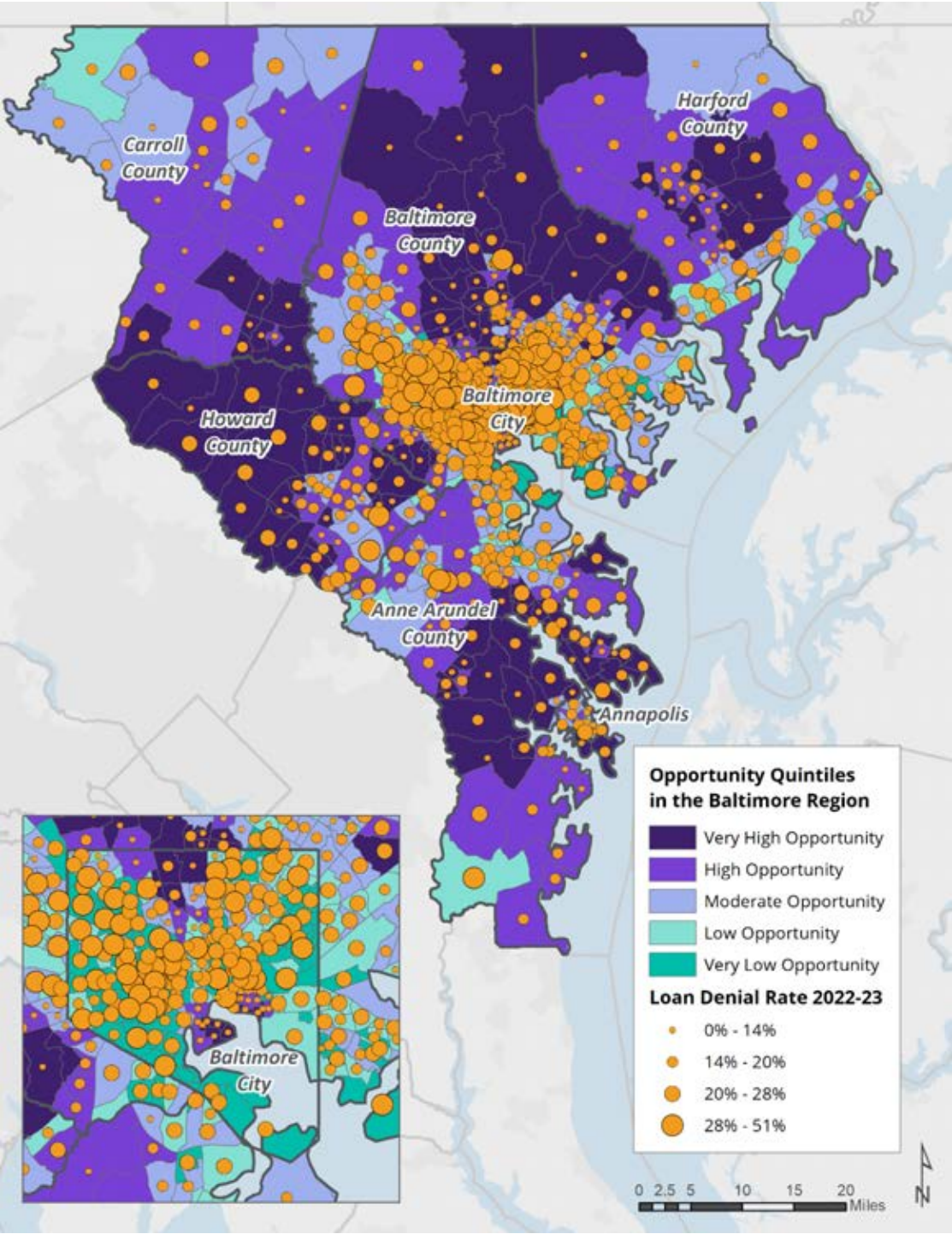
Note: Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.  
 Too few loan applications from Asian, African American, and Hispanic applicants below 80% AMI and Asian applicants above 120% AMI in Annapolis to show data.

Source: HMDA 2022–2023 and Root Policy Research.

Figure V-72 maps tract-level mortgage denial rates (indicated by scaled dots) with tract-level opportunity quintile rankings.

As shown in Figure V-72, Census tracts in the lowest opportunity quintiles tend to have the highest mortgage denial rates. Overall, 25% of mortgage applications for properties in very low opportunity tracts were denied, followed by 22% of applications for properties in low opportunity tracts, 19% of applications from moderate opportunity tracts, 15% of applications from high opportunity tracts, and 14% of applications from very high opportunity tracts.

**Figure V-72.**  
**Mortgage Denial Rates and Opportunity Quintiles by Census Tract,**  
**Baltimore Region, 2022–2023**



Note: Tracts with no denial rate shown had fewer than 25 total loan applications in 2022 and 2023.

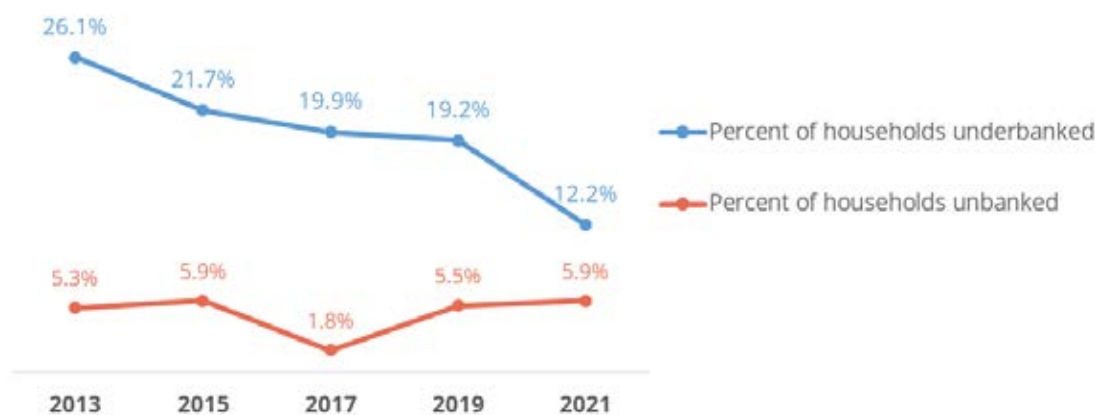
Includes first-lien loans only. Does not include loans for multifamily properties or non-owner occupants. Denial rate is calculated as denied loans divided by the total of originated loans, denied loans, and loans approved but not accepted.

Source: HMDA 2022-2023, BRHP, BMC, and Root Policy Research.

Lack of or poor credit is a very common reason for mortgage loan denials. The Federal Deposit Insurance Corporation (FDIC) monitors the prevalence of unbanked and underbanked households in the U.S. “Unbanked” households are those in which no one in the household has a checking or savings account. “Underbanked” households are those who have an account in an insured institution but also use services that are likely to charge high or very high rates. These services include check cashing institutions, payday loans, “tax refund anticipation” loans, rent-to-own services, pawn shop loans, and/or auto title loans.

The latest FDIC survey, conducted in 2021, found that 12.2% of households in the Baltimore-Columbia-Towson MSA are underbanked—down significantly from 19.2% in 2019—and that 5.9% of households in the MSA are unbanked—up slightly from 5.5% in 2019 and up substantially from 1.8% in 2017.

**Figure V-73.**  
**Unbanked and Underbanked Households, Baltimore-Columbia-Towson MSA, 2013–2021**



Note: Underbanked definition is based on the following nonbank transaction and credit products: check cashing, money order, remittance, payday loan, rent-to-own service, pawn shop loan, refund anticipation loan, and auto title loan.

Source: Multiyear FDIC National Survey of Unbanked and Underbanked Households.

Finally, the FDIC publishes Census Region-level data on why households are unbanked or underbanked. Not having enough money to open an account, lacking trust in the financial industry, and believing that avoiding bank accounts affords increased privacy were the three most frequently cited reasons why households in the South (Maryland’s Census Region) elect not to participate in the traditional banking sector.<sup>17</sup>

<sup>17</sup> Multiyear FDIC National Survey of Unbanked and Underbanked Households, 2021.

## Evictions in the Baltimore Region

This section explores evictions in the Baltimore region, with particular focus on the causes and consequences of eviction, the disproportionate experience of eviction faced by Black women, the eviction process, and differences by jurisdiction.

**Causes and consequences of eviction.** The most common reason landlords file to evict a tenant is nonpayment of rent. Evictions in the context of this study refer to evictions formally filed by landlords to remove a tenant, although literature broadly acknowledges that these only capture a sliver of the reality of displacement.

In ethnographic research conducted in Baltimore City, the researcher found instances of “self-help” evictions, where landlords simply change the locks and throw out the tenant’s belongings. Despite the illegality of such evictions, tenants struggled to navigate the court system and appear at hearings to reprimand the landlord.<sup>18</sup>

In one instance, a tenant filed multiple maintenance requests to fix her water heater and gas appliances. After confronting the landlord, the landlord accused her of threatening arson. At the hearing for the threat, the judge dismissed the case for lack of evidence and the tenant returned home to find the locks had been changed with all her possessions, including money, inside. She was able to sue her landlord but was unable to hold her job as court proceedings were sporadic during the weekdays.<sup>19</sup>

Studies in other cities have also found that evictions disrupt employment, thus perpetuating the cycle of economic and housing insecurity. Researchers theorize that low-income tenants work at jobs with no paid leave, flexible scheduling, or protections from termination. The process of displacement (court hearings, finding a new apartment, securing movers, and/ or homelessness) can last for months, thus impacting work quality and attendance. Using a survey of tenants in Milwaukee, Desmond and Gershenson<sup>20</sup> found that job loss following displacement is correlated even when controlling for potentially confounding variables, such as previous job loss, education, criminal records, and presence of children. In qualitative interviews that accompanied the survey, tenants reported that a job loss was not necessarily the reason for their initial displacement—that their housing situation was precarious from the start and cost burden was extreme even when working full time. Housing instability and evictions thus have implications for fulfilling

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<sup>18</sup> Gretchen Purser, “The Circle of Dispossession: Evicting the Urban Poor in Baltimore,” *Critical Sociology*, 2014.

<sup>19</sup> Purser.

<sup>20</sup> Matthew Desmond and Carl Gershenson, “Housing and Employment Insecurity among the Working Poor,” *Social Problems* 1, no. 1 (2016): 1–22.



demand for jobs within the service industry and for individuals cyclically within both precarious housing and employment situations.<sup>21</sup>

An eviction record severely limits future housing opportunities, further relegating tenants to high poverty neighborhoods with substandard housing or homelessness. Research from the National Bureau of Economic Research<sup>22</sup> showed that in New York City and Chicago, eviction orders increased the probability of the tenant staying in emergency shelters and moving to new addresses for more than two years after the filing. Tenants with eviction judgements also experienced reduced credit scores and more frequent hospital visits relating to mental health conditions. They found that evictions are typically bookended by adverse events, such as falling earnings, exit from the labor market, unpaid bills, and increased hospital visits. These adverse events were exacerbated for the randomly selected tenants with an eviction record compared to those who did not. In the two years following the case, those with records were more likely to be homeless, had moved multiple times, and visited the hospital more often. Earnings dropped drastically for female and Black tenants. Female tenants also had more frequent moves following an eviction.<sup>23</sup>

**Evidence of disproportionate eviction rates.** As mentioned, female and Black tenants experienced the fallout of an eviction record to a more extreme degree than male tenants and tenants of other races. There is also evidence that Black female tenants, especially those with children, are more likely to be evicted.

In 2015, the Public Justice Center conducted a survey with renters in eviction court in Baltimore City and reviewed court records to analyze the demographics of those being evicted.<sup>24</sup> They found that the vast majority of tenants in court were women (79%) and Black (94%). Sixty-five percent of renters in court had children and 43% of women were single parents compared to 21% of men. Strikingly, 85% of renters in court did not have any form of housing subsidy, highlighting a large disparity in access to housing resources. Most renters in the study also experienced substandard housing issues. Fifty-eight percent reported an insect or rodent issue, followed by 41% who reported peeling or flaking paint, 37% with plumbing leaks, and 36% with mold.<sup>25</sup>

In response to the disproportionate impact of evictions and mounting toll of the COVID-19 pandemic on housing instability, the Maryland General Assembly created the Access to Counsel in Evictions program (ACE). Maryland Legal Services Corporation (MLSC) provides

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<sup>21</sup> Desmond and Gershenson.

<sup>22</sup> Robert Collinson et al., "Eviction and Poverty in American Cities," *National Bureau of Economic Research*, 2022, <https://www.nber.org/papers/w26139>.

<sup>23</sup> Collinson et al.

<sup>24</sup> "How Renters Are Processed in the Baltimore City Rent Court" (Public Justice Center, 2015), [https://publicjustice.org/wp-content/uploads/2019/09/JUSTICE\\_DIVERTED\\_PJC\\_DEC15.pdf](https://publicjustice.org/wp-content/uploads/2019/09/JUSTICE_DIVERTED_PJC_DEC15.pdf).

<sup>25</sup> "How Renters Are Processed in the Baltimore City Rent Court."

civil legal assistance to low-income Marylanders facing eviction. Of the cases in Baltimore region within the ACE program in 2023:

- Eighty-nine percent received an eviction notice due to failure to pay rent; and
- Legal representation helped 3,079 people avoid eviction and 2,545 people were able to delay eviction either to pay-to-stay or find alternative housing.

MLSC also conducts tenant outreach and education to inform tenants of their services and to ensure that they know their rights in the event of an eviction notice or dispute with their landlord.

**Eviction process and definitions.** Landlords and property managers must provide transparent reasons for eviction and follow strict notification guidelines to ensure the tenant is aware of the imminent loss of housing. Figure V-74 shows the reasons landlords filed a petition for warrant of restitution (eviction filing) by jurisdiction.

**Breach of lease.** A breach of lease signifies that the tenant violated the lease with no opportunity to correct. This usually is due to the tenant presenting a clear and present danger to people or property. The landlord will provide the tenant with a 14-day notice to quit, meaning they have two weeks to move out before an eviction lawsuit is filed. For breaches of a lease that do not present a clear and present danger, the landlord can file a 30-day notice to quit. As shown, a breach of lease is the least common reason for a petition for warrant of restitution. Baltimore City accounts for over half of all breach of leases in the region.

**Failure to pay rent.** Failure to pay rent is the most common reason landlords file a petition for a warrant of restitution across all jurisdictions. When a tenant falls behind on rent, the landlord issues a 10-day notice that states the tenant has 10 days to pay back rent or an eviction lawsuit will be filed. In Maryland, tenants can “pay to stay” at any point in the eviction process up until the point the sheriff is at the door or furniture has been forcibly removed.

**Tenant holding over.** Tenants who stay in a unit past their lease termination date are issued a 60-day notice<sup>26</sup> to leave in most jurisdictions. Holdover cases only make up 1% of all petitions in the region. Baltimore City accounts for almost two-thirds of all holdover cases.

**Wrongful detainer.** Wrongful detainers can be sued to expel house guests or squatters and can be filed by tenants or other persons who are lawful occupants of the property.

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<sup>26</sup> Must be *at least* 60 days in Baltimore City: [Baltimore City Rental and Housing Laws | The Maryland People's Law Library \(peoples-law.org\)](https://www.peoples-law.org/library/baltimore-city-rental-and-housing-laws)

Again, wrongful detainer cases only make up 1% of all petitions in the region, with Baltimore City accounting for the majority of cases.

**Figure V-74.**  
**Petitions for Warrants of Restitution, 2023 to April 2024**

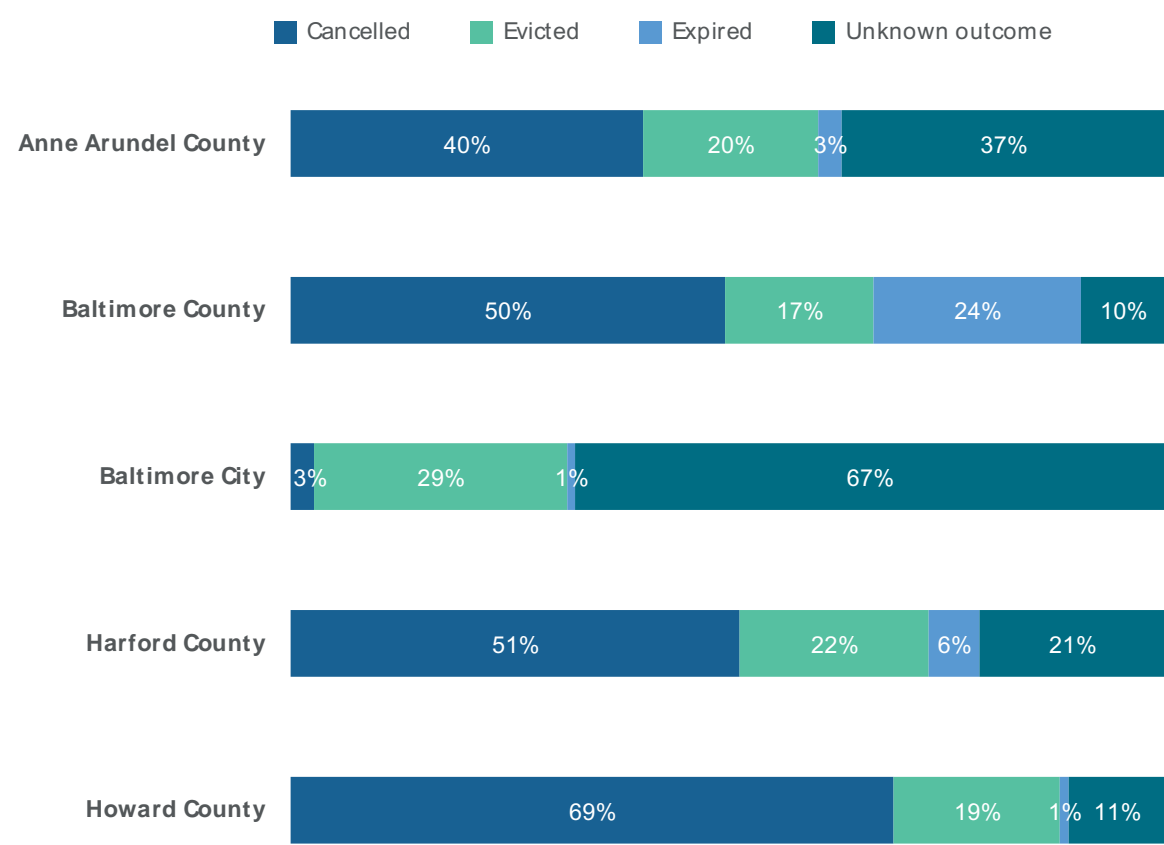
	Breach of Lease		Failure to Pay Rent		Tenant Holding Over		Wrongful Detainer		Total Petitions by Jurisdiction	
	n	%	n	%	n	%	n	%	n	%
<b>Anne Arundel County</b>	14	0%	6,053	98%	40	1%	39	1%	6,146	10%
<b>Baltimore County</b>	73	0%	27,953	99%	115	0%	110	0%	28,251	47%
<b>Baltimore City</b>	124	1%	19,686	96%	361	2%	367	2%	20,538	34%
<b>Harford County</b>	10	0%	2,211	97%	22	1%	38	2%	2,281	4%
<b>Howard County</b>	13	0%	2,642	98%	30	1%	19	1%	2,704	5%
<b>Region</b>	234	0%	58,545	98%	568	1%	573	1%	59,920	100%

Source: Maryland Department of Housing and Community Development Landlord and Tenant Eviction Dashboard. For more information, see: [Microsoft Power BI \(powerbigov.us\)](https://powerbigov.us)

Figure V-75 presents the proportion of outcomes of warrants of restitution. Gaps in data vary by jurisdiction, reflecting inconsistent reporting by court officials and sheriffs. A warrant of restitution requires the tenant to leave within four days. If a tenant has medical conditions that make it dangerous to leave, the tenant can secure a doctor’s note and have 15 days to leave. Expired warrants signify that the landlord did not request a warrant of restitution within 60 days of the judgement. Cancelled warrants generally show that the tenant moved out or paid.

Baltimore City stands out as having the highest proportion of eviction as an outcome of any jurisdiction at 29%, but also has the highest proportion of unknown outcomes. Harford County has the second highest proportion of cases that ended in eviction at 22%. Baltimore County and Howard County have the most complete data and both counties have the highest number of warrants that were cancelled or expired.

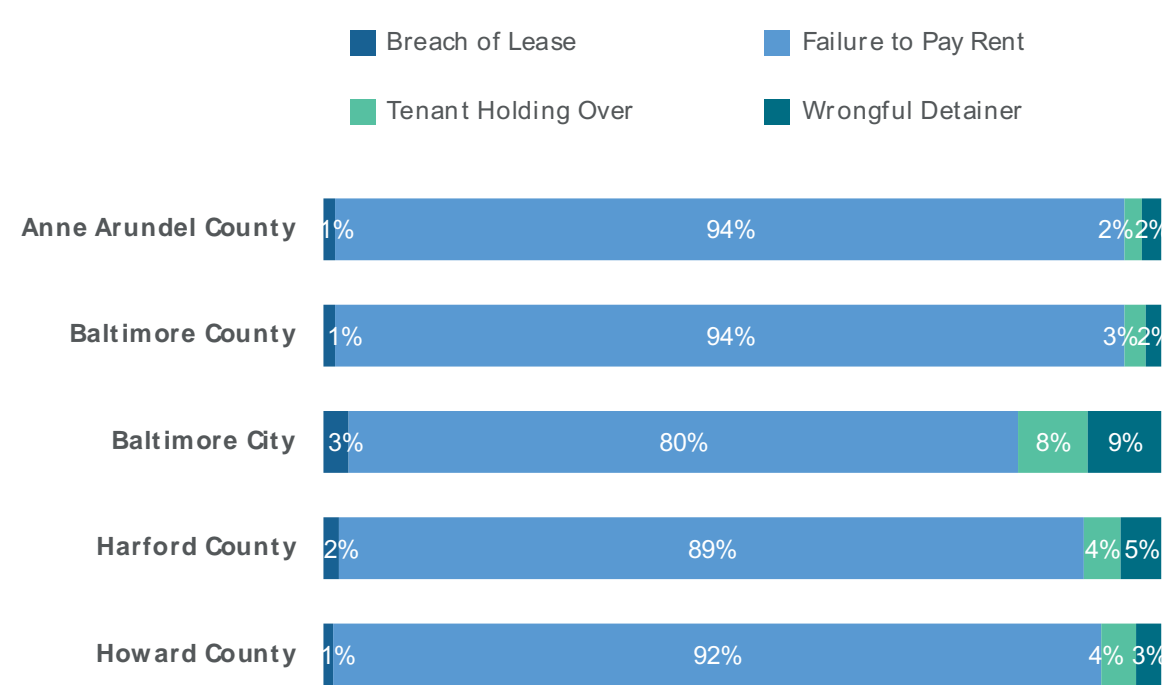
**Figure V-75.**  
**Warrant of Restitution Outcomes by Jurisdiction**



Source: Maryland Department of Housing and Community Development Landlord and Tenant Eviction Dashboard. For more information, see: [Microsoft Power BI \(powerbigov.us\)](https://powerbigov.us).

As discussed, failure to pay rent is the most common reason landlords file a petition for a warrant of restitution. This remains true through the court process when a warrant of restitution is officially issued to evict a tenant. Figure V-76 displays the detailed reasons cases ended in eviction by jurisdiction. Outside of failure to pay rent, holdovers and wrongful detainers were most common in Baltimore City and Harford County.

**Figure V-76.**  
**Warrants of Restitution Resulting in Eviction by Reason**



Source: Maryland Department of Housing and Community Development Landlord and Tenant Eviction Dashboard. For more information, see: [Microsoft Power BI \(powerbigov.us\)](https://powerbigov.us).



## SECTION VI.

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### PUBLICLY SUPPORTED HOUSING

## SECTION VI.

# Publicly Supported Housing Analysis

This section is updated as much as possible from the 2020 Analysis of Impediments to Fair Housing Choice (AI) in the Baltimore Region. It uses available data to analyze geographic and racial and ethnic concentrations of households who benefit from publicly supported housing.

### Primary Findings

- Baltimore City continues to provide a much larger share of affordable rental housing, including publicly supported housing, than its share of all rental units. An updated analysis of the location of publicly assisted rental housing finds that Baltimore City continues to provide 59% of all publicly assisted units, compared to 38% of the region's renter households (it should be noted that this improved from 70% and 39% in 2010). Although counties outside of Baltimore City have done more to increase affordable housing supply, large concentrations take time to rebalance, especially when barriers to multifamily production exist (discussed more in the Zoning and Land Use section).
- More broadly, publicly assisted homes overall, and especially those open to families, continue to be located disproportionately in lower opportunity areas of the region compared to the region's housing stock overall. Scoring incentives for Maryland's competitive 9% Low Income Housing Tax Credit (LIHTC) awards will be critical to countering and correcting for that historical trend, even following fulfillment of Maryland's 2017 fair housing voluntary conciliation agreement.
- Baltimore City contains almost all of the region's Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs), with only one R/ECAP tract in Baltimore County (in the Middle River area) and one in Harford County (Aberdeen). Baltimore City also has the largest number of Census tracts that are low opportunity areas.
- From available data, publicly supported housing is disproportionately occupied by African American households in the region: African American households make up 48% of the region's extremely low income households yet are 88% of Housing Choice Voucher (HCV) holders—up from 82% in our 2020 document. The over-representation the region's African American residents in publicly supported housing is a consequence of income and wealth disparities, which themselves are related to historical restrictions on housing choice, denial of education and employment opportunities, and limited investment.

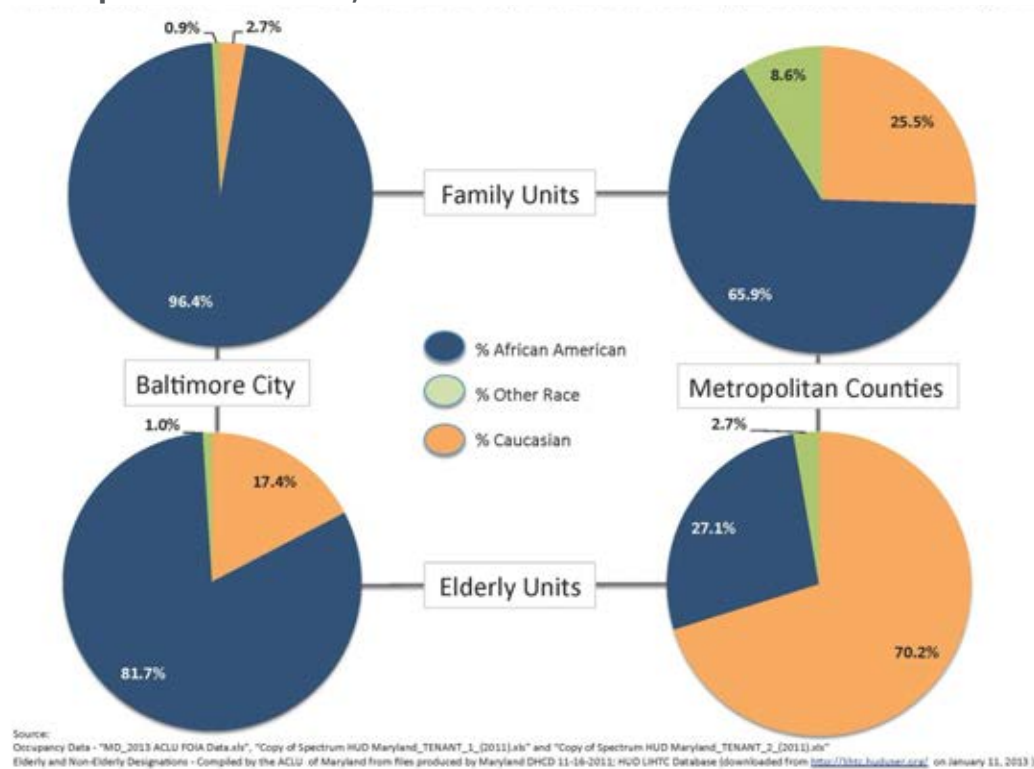
## Demographics of Residents and Publicly Supported Housing

**Low Income Housing Tax Credits.** In 2013, the ACLU examined the composition of occupants of Low Income Housing Tax Credit (LIHTC) units by race and family and elderly status using data obtained through a public records request to the Maryland Department of Housing and Community Development and HUD.<sup>1</sup> A 2019 request to DHCD for more up-to-date data for this analysis revealed that, while tracked by DHCD by law, obtaining such data requires a Public Information Act request each time.

As shown in the figure below, similar to the composition of HUD-supported multifamily development units in the 2020 version of this document, as of 2011, LIHTC units in the region open to families were disproportionately likely to be occupied by African American residents, even after adjusting for income.

Also similar to the Other Multifamily category (predominantly comprised of senior-restricted Section 202 properties) from the HUD-supported data above, as of 2011, senior developments in the counties were more likely to be occupied by Non-Hispanic White households.

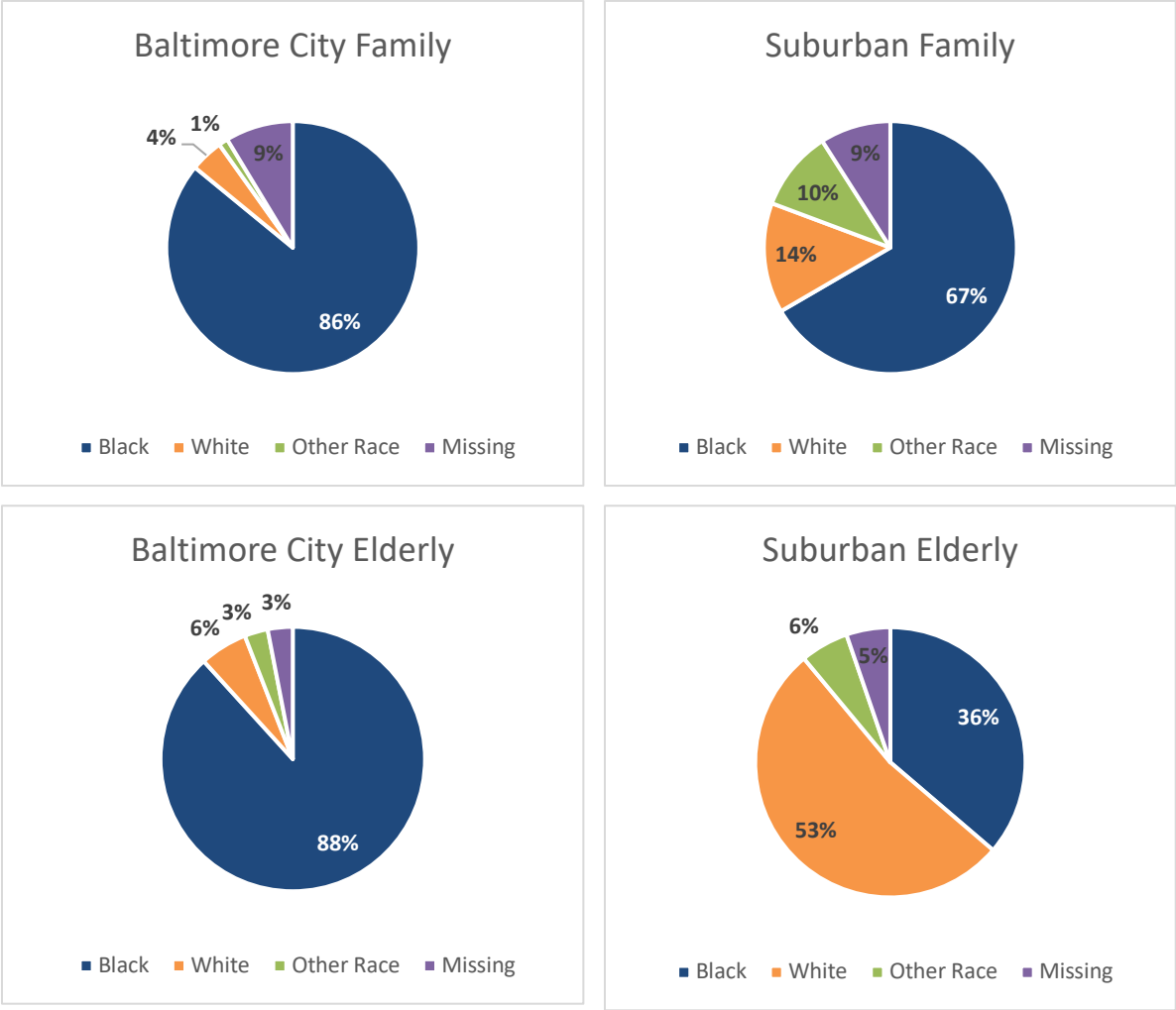
**Figure VI-1.**  
**Racial Occupancy of LIHTC Units in Baltimore City and the Surrounding Metropolitan Counties, 2011**



<sup>1</sup> More recent data do not appear to be readily available.

Following the publication of the 2020 regional fair housing analysis, and at DHCD’s request, BMC submitted another Public Information Act request and received the same data for 2021. As shown in Figure VI-2 below, these new data indicate that, among the LIHTC units where the race of the resident was known, Black families gained additional access to LIHTC homes in the suburban jurisdictions. Black senior citizens also gained more access to elderly rental units, both in suburban jurisdictions and in Baltimore City. Family LIHTC units in Baltimore City became slightly more racially diverse.

**Figure VI-2.**  
**Racial Occupancy of LIHTC Units in Baltimore City and the Surrounding Metropolitan Counties, 2021**



**Voucher holders.** The demographics of voucher holders and how those demographics differ by if vouchers are living in R/ECAPs are summarized in the table below. The vast majority of voucher holders are Black across jurisdictions except for Harford County, where voucher holders are most racially balanced. Nearly all voucher holders have incomes of 50% of the AMI and lower (very low income). Anne Arundel County, Baltimore County, and Howard County have the highest shares of voucher holders who are single female parent households living in non-R/ECAP tracts. In Baltimore County, a higher share of single female parent households live in non-R/ECAPs than R/ECAPs, which bodes well for children. Across jurisdictions, about one-third of people living in voucher-subsidized households have disabilities.

Since all but two R/ECAPs are located in Baltimore City, the city's data are the most relevant when comparing R/ECAP and non-R/ECAPs, and there are no discernable differences in the demographics of voucher holders by R/ECAP.

**Figure VI-3.**  
**Demographics of Voucher Holders**

Voucher Holders	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Very Low Income	% Single Female Parent	% with a Disability
<b>Anne Arundel County</b>							
Non R/ECAP tracts	17%	78%	3%	2%	93%	46%	20%
<b>Baltimore County</b>							
R/ECAP tracts	20%	77%	3%	0%	97%	32%	32%
Non R/ECAP tracts	14%	84%	2%	0%	95%	51%	24%
<b>Harford County</b>							
R/ECAP tracts	32%	60%	6%	0%	91%	38%	37%
Non R/ECAP tracts	38%	57%	4%	1%	97%	34%	33%
<b>Howard County</b>							
Non R/ECAP tracts	12%	82%	4%	2%	92%	53%	19%
<b>Baltimore City</b>							
R/ECAP tracts	3%	95%	1%	0%	97%	38%	34%
Non R/ECAP tracts	4%	94%	1%	0%	97%	39%	34%
<b>Annapolis</b>							
Non R/ECAP tracts	9%	88%	3%	0%	96%	30%	21%

Note: Race and ethnicity are reported at the household level; disability is reported as the share of person residing in households..

Source: HUD Picture of Subsidized Households and Root Policy Research..

## Public-Sector Strategies for Addressing R/ECAPs: Baltimore City's Community Development Strategy

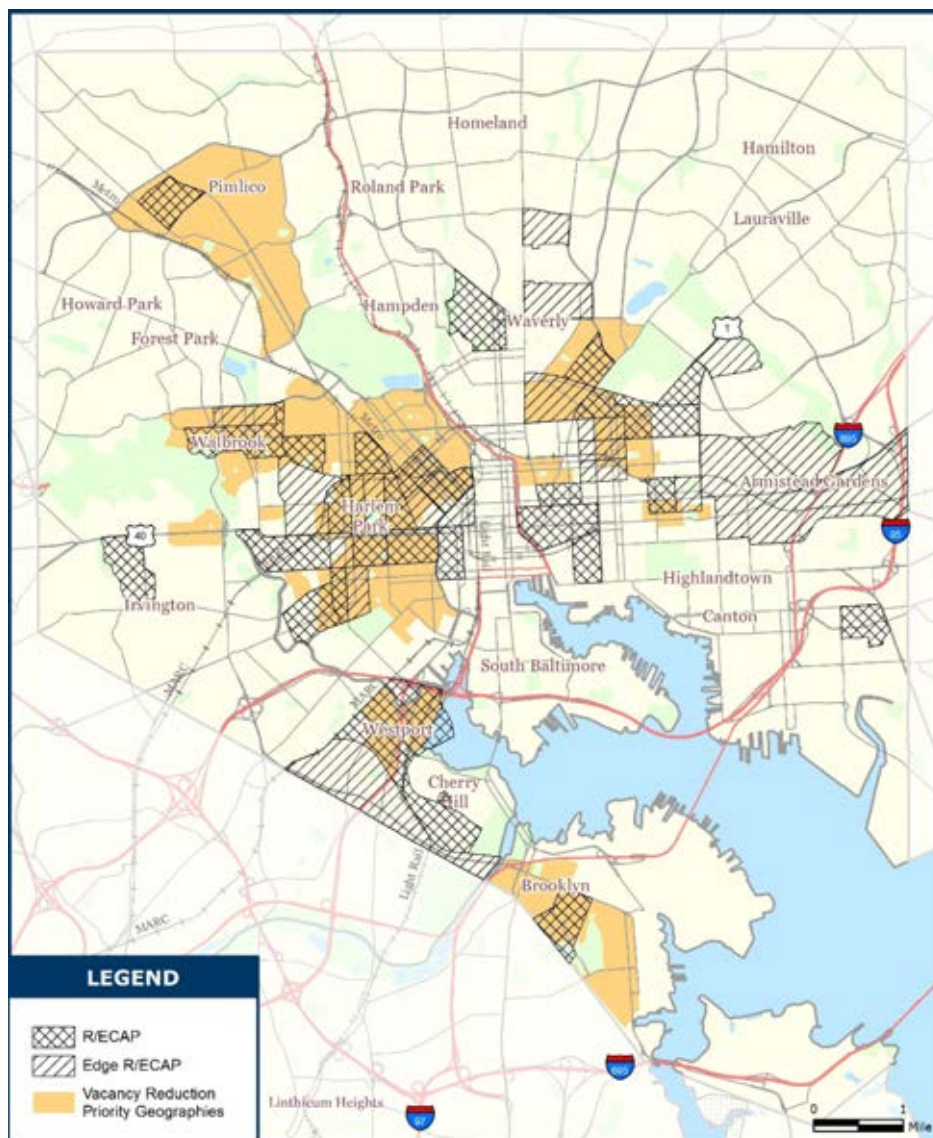
Recognizing, as Section III of this analysis does, that 20th century redlining correlates significantly with current R/ECAPs in Baltimore City, it is appropriate here to explore how 21st century public policy could address these areas of continued concentrated poverty. All of the 20th century redlined areas and almost all of the 21st century R/ECAPs are located in Baltimore City, and Baltimore City has understandably put the most effort into addressing them. Major forces in creating our region's R/ECAPs, however (e.g. federal housing policy, jurisdictional boundaries, State annexation policy), reach well beyond Baltimore City

government's control, and, as the City of Baltimore and revitalization advocates have recognized and acted on already, resources well beyond Baltimore City will be needed to address them.

Since February 2019, the Baltimore City Department of Housing and Community Development (DHCD) has been refining its community development areas of focus. Figure VI-4 shows that the City's new Vacancy Reduction Priority Geographies line up well with R/ECAPs and Edge R/ECAPs within Baltimore City.

**Figure VI-4.**  
**Baltimore City**  
**Vacancy**  
**Reduction**  
**Priority**  
**Geographies**  
**Overlaid with**  
**Racially/**  
**Ethnically**  
**Concentrated**  
**Areas of Poverty**  
**(R/ECAPs)**

Source:  
ACS, Root Policy Research,  
Baltimore City Dept. of  
Housing and Community  
Development, BMC.



Even R/ECAP geographies not covered by Vacancy Reduction Priority Geographies often reflect City revitalization strategies. The western R/ECAP just south of Route 40 is the site of the in-progress mixed-income Uplands redevelopment of a large, troubled affordable housing complex that was demolished many years ago. The tract now includes a nursing home and many apartments, including new publicly assisted apartments, but not significant vacancy.

The upside-down-“L”-shaped R/ECAP area near downtown is the site of the large-scale redevelopment of the former Perkins and Somerset Homes public housing complexes by the Housing Authority of Baltimore City (HABC) and City of Baltimore. It is located in this R/ECAP (along with other, continuing public housing complexes), but also near areas of opportunity in Harbor East, Fells Point, and Butchers Hill. The development received the valuable HUD Choice Neighborhoods designation and redevelopment grant, as well as Tax Increment Financing (TIF) and HOME funds from the City, and Low Income Housing Tax Credits from the State. The redeveloped project will include new deeply subsidized housing to replace the Perkins Homes units, additional subsidized homes for somewhat higher income residents, and new market-rate housing. It will also include a new state-of-the-art City Springs Elementary/Middle School and onsite case management through the University of Baltimore.

The R/ECAP tract that includes the Johns Hopkins University Homewood campus likely reflects the low earnings of the students there, as well as the significant Asian student population (which helps the tract meet the R/ECAP requirement of being majority people of color). There is no significant home vacancy in the tract, and this tract is unique in Baltimore City in how significant the campus and dormitories are relative to non-campus residences.

Within its Vacancy Reduction Priority Geographies, the City of Baltimore employs a variety of strategies, such as DHCD’s strategic code enforcement, receivership, in rem foreclosure, land disposition agreements with key development partners, and broader targeted infrastructure investments:

**Southwest Priority Geography.** In this area, Baltimore City is working to leverage ongoing City-sponsored redevelopment in the Poppleton neighborhood, a HUD planning grant to redevelop Poe Homes, and the Southwest Partnership anchor/neighborhood revitalization collaboration to rejuvenate that area, much of which is still designated either R/ECAP or Edge R/ECAP.

**Western Priority Geography.** To the north of the Southwest area, the City is working to build from the market strength of neighborhoods to the east—including the recent growth in Reservoir Hill, the successful Heritage Crossing HOPE VI site to the south, and the new Pennsylvania Avenue Arts and Entertainment District to breathe new life into that largely R/ECAP corridor and surrounding neighborhoods. Recent City and State investments on the 800 blocks of both Harlem Ave. and Edmondson Ave. have renovated more than two dozen rowhomes there for homeownership.

**Park Heights Priority Geography.** Moving to the northwest, Baltimore City continues to implement the 2008 Park Heights Master Plan, and a new 2024 State plan to own, redevelop, and operate Pimlico Race Course brings new resources to this R/ECAP and Edge R/ECAP area.



**Eastern Priority Geographies.** These areas seek to build from the strength of Johns Hopkins Hospital, Penn Station, and recent growth in Barclay, Greenmount West, and Oliver to boost the nearby neighborhoods of Johnston Square, Broadway East, East Baltimore Midway, and Coldstream-Homestead-Montebello. Significant City, State, and private investment have in Oliver and Broadway East has driven vacancy down 92 percent, creating nearly 200 new and rehabbed homes.

The newest effort has already raised \$100 million to tackle vacant homes and build new community amenities in Johnston Square, a community that census data and HUD criteria designated an R/ECAP in our 2020 regional fair housing analysis. Fifteen homes have already been rehabilitated into Teacher Square communal homes on high-visibility Biddle Street, and another 30 rowhomes are being renovated now. A new apartment building with 60 affordable homes opened in 2021, and another with 109 affordable apartments and a new ground-floor Enoch Pratt Free Library is under construction now. As rowhomes are being renovated for new homeowners in Johnston Square, these two apartment buildings will make sure that the community also has high-quality rental homes.

This work in East Baltimore has served as something of a template for an ambitious new City-wide initiative launched in 2023 by Mayor Brandon Scott, Governor Wes Moore, the Greater Baltimore Committee, and the community organization BUILD (Baltimoreans United in Leadership Development). The collaboration has identified the first \$1 billion to the anticipated \$3 billion in public funds needed to address the City's entire vacant home problem, with Mayor Brandon Scott and the Baltimore City Council committing \$300 million over 15 years and the State of Maryland pledging another \$700 million over the same timeline. Mayor Scott and Governor Wes Moore anticipate that this investment can address 5,000 of the City's estimated 13,000 vacant homes.

## **Updating Changes in R/ECAP Status near Baltimore's Eastern Vacant Reduction Priority Geographies**

In our 2020 document, we looked closely at six of the East Baltimore Census tracts that represented shifts in R/ECAP status since 2000:

**Figure VI-5.**  
**Area of RCAP Case Study Analysis**



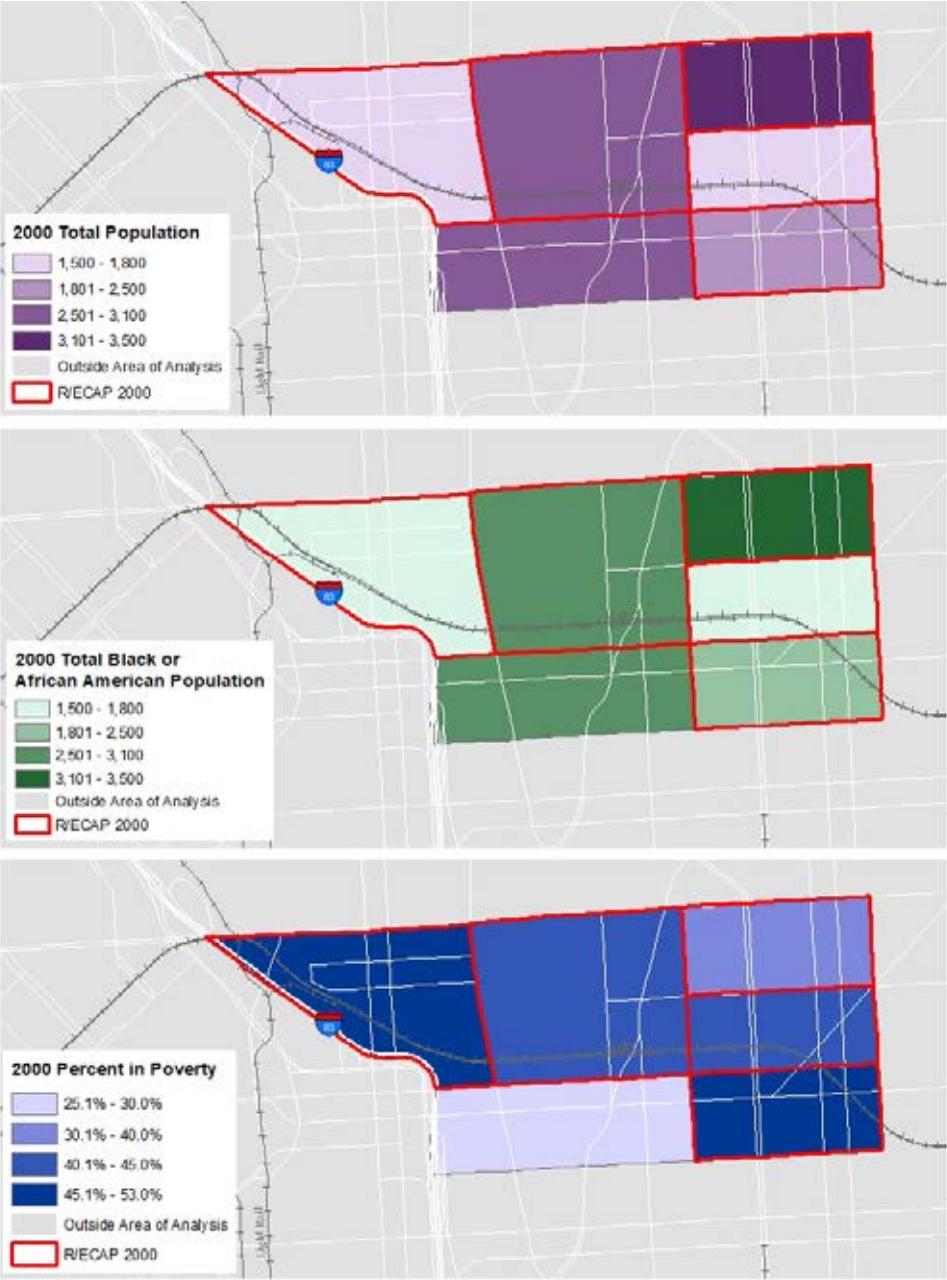
Source: BMC, Baltimore City Dept. of Housing and Community Development.

Figure VI-5 above shows the Census tracts in this analysis shaded in gold. Census tract numbers and boundaries are depicted in red, and neighborhood names and boundaries are in blue. These Census tracts include a number of revitalization efforts both championed and supported by the City of Baltimore since 2000:

- The Station North Arts and Entertainment District, which Baltimore City created in 2002 and covers much of Census tract 1205,
- Concerted Greenmount West investments beginning about 2010 on the eastern side of the same tract,
- The East Baltimore Development Initiative (EBDI) redevelopment effort begun in the 2000s in the “forward-hashed,” piano-shaped area of tracts 807 and 808, below the Amtrak tracks,
- A nearby effort led by BUILD and ReBUILD Metro focused on target blocks (“back-hashed”) primarily in the Oliver neighborhood that gathered momentum around 2010.
- A new effort led by the ReBUILD Johnston Square Neighborhood Organization and ReBUILD Metro to implement a 2019 plan to rejuvenate the Johnston Square neighborhood.

In 2000, before all of these efforts, five of these tracts—Station North (1205), three Oliver and Broadway East tracts (909, 806, and 807), and the tract centered on the work of East Baltimore Development, Inc. (808)—qualified as Racially Concentrated Areas of Poverty.

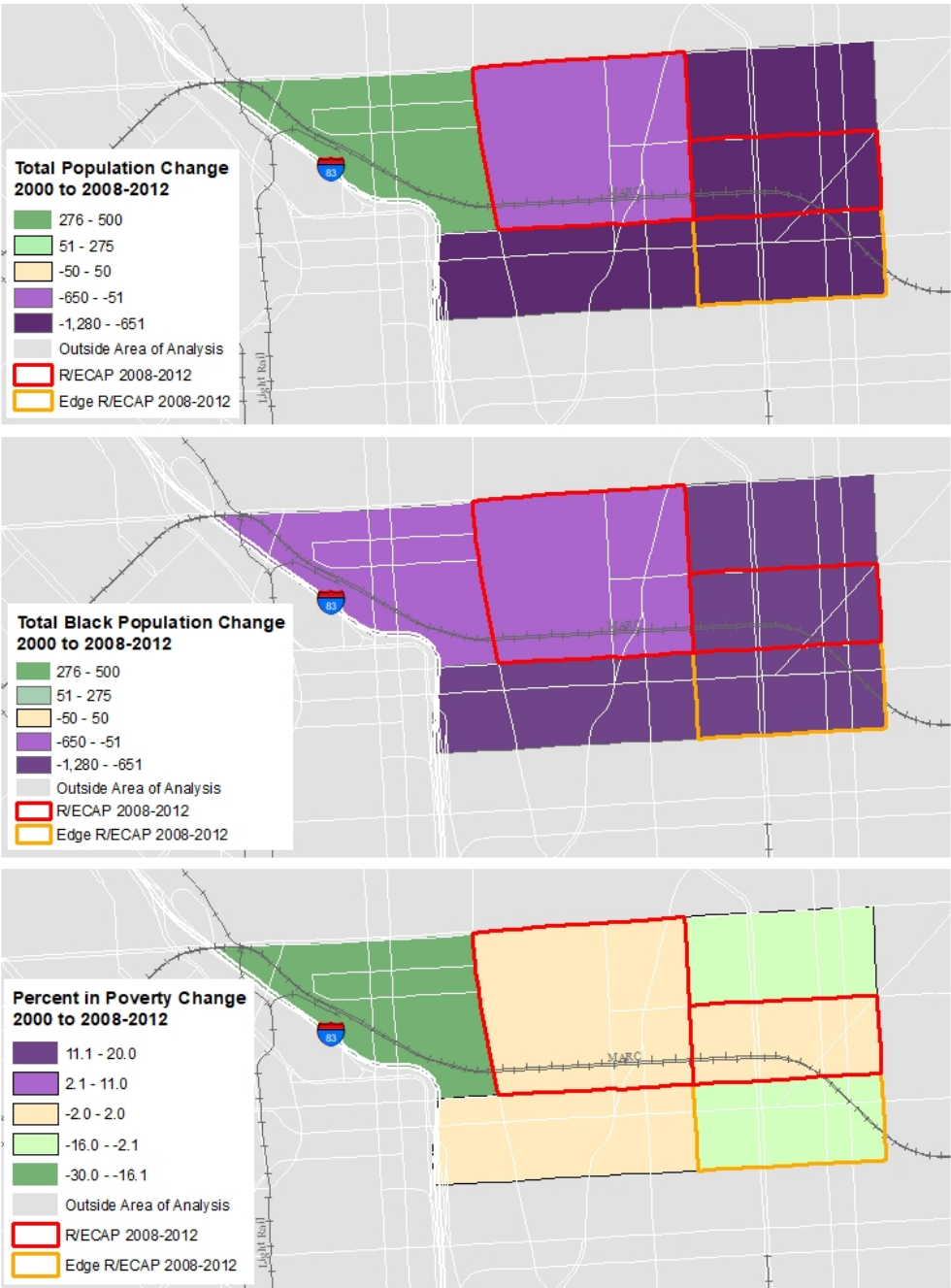
**Figure VI-6.**  
**Case Study 2000 Census Data and RCAP Status**



Source: BMC and U.S. Census Bureau.

By the 2008-2012 ACS, Station North had begun to gain population, but the other tracts experienced dramatic population loss, sometimes losing their R/ECAP status by sheer loss of population of people in poverty.

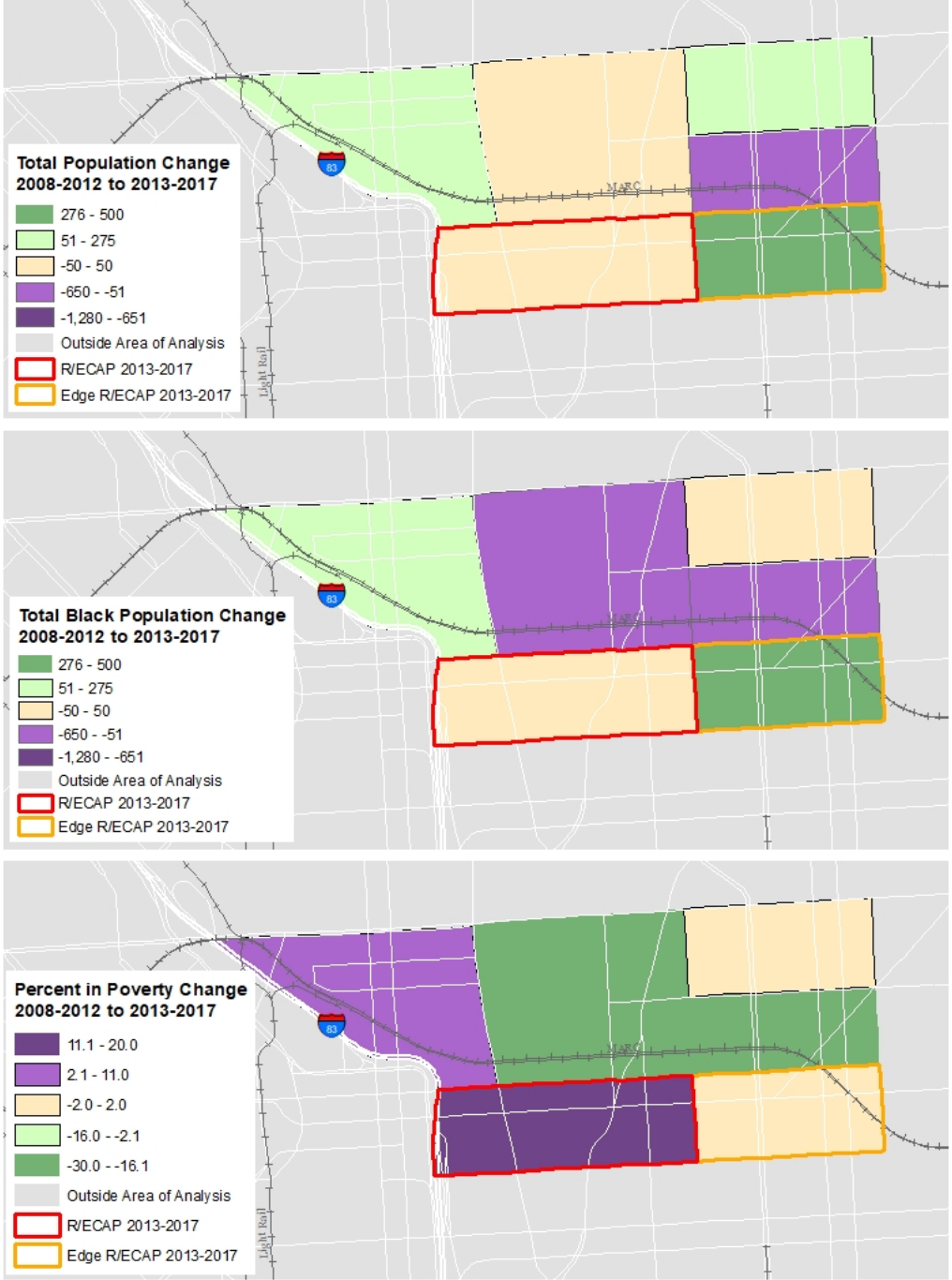
**Figure VI-7.**  
**Maps of Change between 2000 Decennial Census to 2008-2012 American Community Survey (ACS) Census Data**



Source: BMC and U.S. Census Bureau.

By the 2013-2017 American Community Survey (ACS) Census data, all the 2000 R/ECAPs had lost that status, sometimes because of revitalization-related population growth, particularly in Station North and EBDI, but often through the population churn of concentrated poverty and high vacancy. Meanwhile the sixth tract, Johnston Square (1001), had become poorer through this churn and newly qualified as an R/ECAP.

**Figure VI-8.**  
**Maps of Trends from 2008-2012 ACS Census Data to 2013-2017 ACS**



Source: BMC and U.S. Census Bureau.



As you can see in Figure VI-9 below, looking at the 2018-2022 ACS data, Johnston Square has lost its RCAP status amid substantial population loss of people in poverty. And, while the area as a whole continues to lose population, it appears to have stabilized somewhat below full RCAP status. There are signs of renewal accompanying a determined revitalization strategy that Mayor Scott and Governor Moore are now working to expand citywide.

**Figure VI-9.**  
**Maps of Trends from 2013-2017 ACS Census Data to 2018-2022 ACS**



Source: BMC and U.S. Census Bureau.

**New results.** With the caveat that ACS data at this scale tends to have large margins for error, our primary findings from 2020 appear to hold in 2025:

**1. Concentrated poverty and substantial housing vacancy alone appear to be significant destabilizing forces in a community.**

- In 2020 we found that population losses in census tracts outside Baltimore City's large-scale East Baltimore Development, Inc. (EBDI) redevelopment effort during the decade of the 2000s were astonishingly comparable to, or even higher than, EBDI's property condemnation and relocation of 700 households, primarily in tract 808, early in that decade. Concentrated poverty and home vacancy by themselves appear to lead to substantial population churn.
- This churn of residents continued into the 2018-2022 ACS period, with wild population swings in the Broadway East tracts largely outside the EBDI footprint. At the same time, the Johnston Square census tract lost its RCAP status, but only because of substantial population loss of people in poverty, similar to Broadway East in the 2000s and 2010s.

**2. Baltimore City's Community Development Strategy continues to show progress and extend to neighboring areas, with needed City and State funds identified.**

- In the 2000s and 2010s, the Station North tract (1205) lost its RCAP status and ultimately gained population of all races, including an increase in residents below the poverty line, amidst Baltimore City's new arts district and vacant home reduction effort in the Greenmount West neighborhood. In addition, the EBDI and Oliver Target Block work of Baltimore City and ReBUILD Metro in tracts 807 and 808 in the 2010s appeared to contribute to a net gain in residents with incomes above the poverty line in both of those tracts.
- For the 2018-2022 period, Station North appears to be stabilized as a relatively low-poverty census tract with no substantial vacancy. In addition, the EBDI tract continues to gain population of all races and incomes. As a result, Baltimore City, ReBUILD Metro, and surrounding neighborhood organizations are focusing new attention to the nearby communities of Johnston Square and Broadway East. Over time that should extend the dramatically reduced vacancy and healthier real estate market of Station North, EBDI, and parts of Oliver and Broadway East to Johnston Square and Broadway East north of the Amtrak tracks, stopping the recent population churn and attracting additional residents of all races and incomes.



## Regionwide: Geographic Distribution and Access to Opportunity

Shifting from a focus on the region's R/ECAPs to the region as a whole, the Baltimore Metropolitan Council (BMC) maintains a database of publicly supported housing by location and household type served.<sup>2</sup> BMC contracted with the Baltimore Neighborhoods Indicators Alliance (BNIA) at the University of Baltimore to update that database and use it to conduct a spatial analysis of publicly assisted housing relative to areas of opportunity.

The analysis compares the location of publicly assisted housing with the two opportunity maps presented in Section IV. Because of the racial disparities in the HUD and Maryland data between who is served by elderly restricted housing compared to general occupancy housing, this section often distinguishes between those types of assisted housing. It also often compares the distribution of various types of assisted housing with the distribution of all housing units in the metropolitan area.

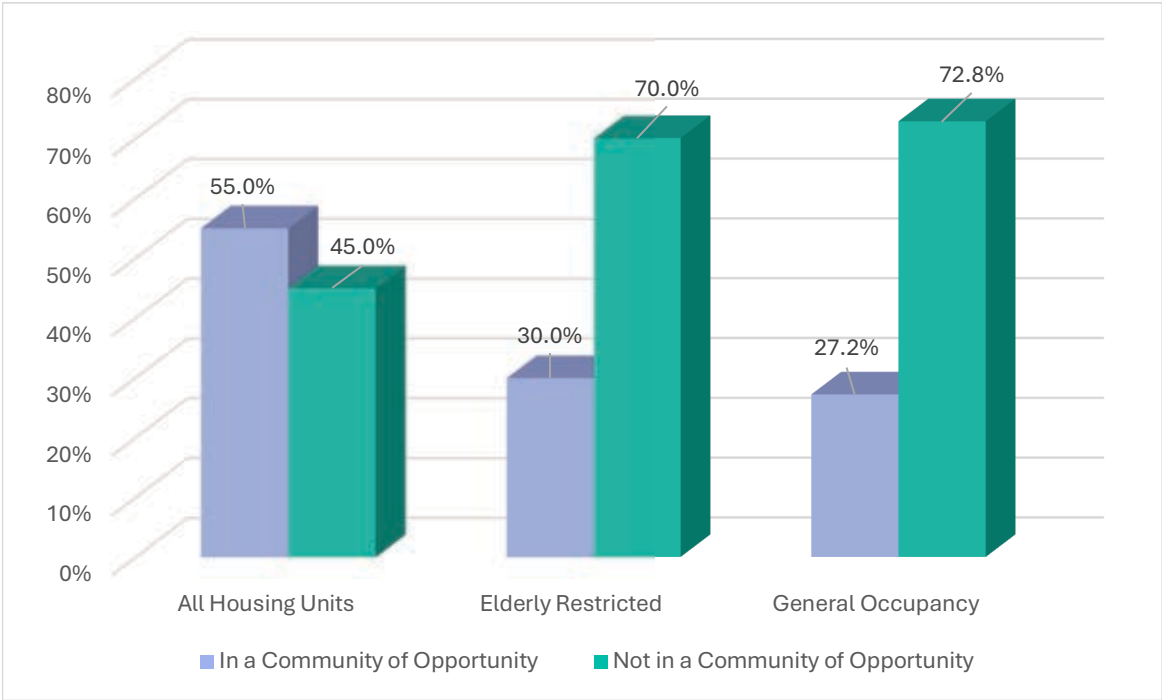
**Low Income Housing Tax Credits.** Low Income Housing Tax Credits (LIHTC) are now the primary funding mechanism for new affordable housing and major rehabilitation and redevelopment of existing assisted housing. The location of LIHTC in the Baltimore region was the reason for the filing of a 2011 private fair housing complaint against the State of Maryland, which Maryland DHCD settled in 2017. Since the 2012 Regional AI, and continuing in the 2020 AI, the jurisdictions in the Baltimore Regional Fair Housing Group have been focused on the distribution of LIHTC as a primary driver of the location of new publicly assisted housing units and thus a key element of affirmatively furthering fair housing.

Figure VI-10 below shows the distribution of all housing units and elderly restricted and general occupancy LIHTC-assisted units compared to Maryland DHCD's Communities of Opportunity (COOs). It still shows that general occupancy LIHTC-assisted units are located in COOs at a lower rate than LIHTC-assisted units that are restricted to senior citizens, although that gap has shrunk since our 2020 analysis. It also shows general occupancy LIHTC-assisted units located in COOs at about half the rate of all of the region's housing units, a margin that has also shrunk since our last analysis. While DHCD adjusted their opportunity map in 2023, making this not entirely an apples-to-apples comparison, this change in the last five years likely reflects DHCD's push to fund 1,050 new units in order to fulfil their 2017 voluntary conciliation agreement with HUD and fair housing complainants. The ratio is also likely assisted by the expiration of early 1990s extended use agreements for several hundred LIHTC units in lower-opportunity areas in Baltimore City.

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<sup>2</sup> This includes rental units with any type of public assistance—PHA developments, LIHTC developments, and units subsidized through specialized federal programs that assist low income elderly and persons with disabilities.

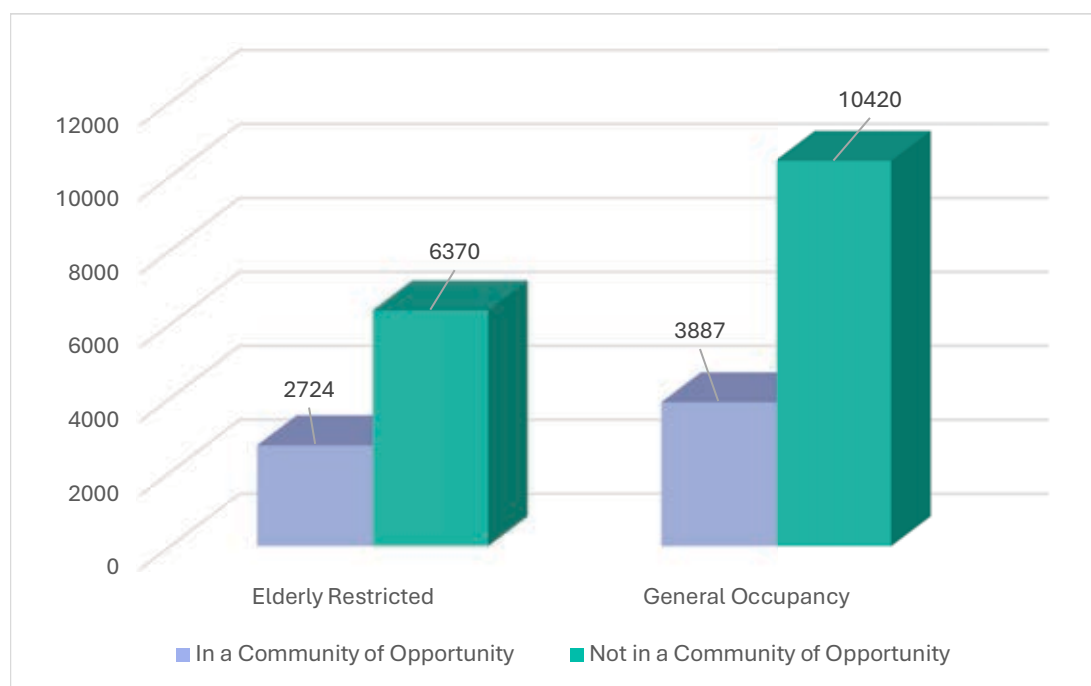
**Figure VI-10.**  
**Distribution of Housing Units Inside and Outside of Maryland DHCD**  
**Opportunity Areas in the Baltimore Region in 2018**



Source: Maryland DHCD, BMC, and Baltimore Neighborhood Indicators Alliance (BNIA)

The chart below shows the distribution of actual numbers of LIHTC-assisted units in the Baltimore metropolitan area in 2024. It shows that nearly 40% of all the LIHTC-assisted units represented in the chart below are restricted to senior citizens. Previous Maryland DHCD analyses – such as included in our 2020 Regional AI – have indicated that the shortage of affordable housing for seniors is only about one-quarter of the overall shortage. Anecdotal experience also indicates that waiting lists for senior assisted housing are generally not as long as those for general occupancy assisted homes.

**Figure VI-11.**  
**Distribution of LIHTC-Assisted Units in Baltimore Area in 2024**



Source: Maryland DHCD, BMC, and Baltimore Neighborhood Indicators Alliance (BNIA)

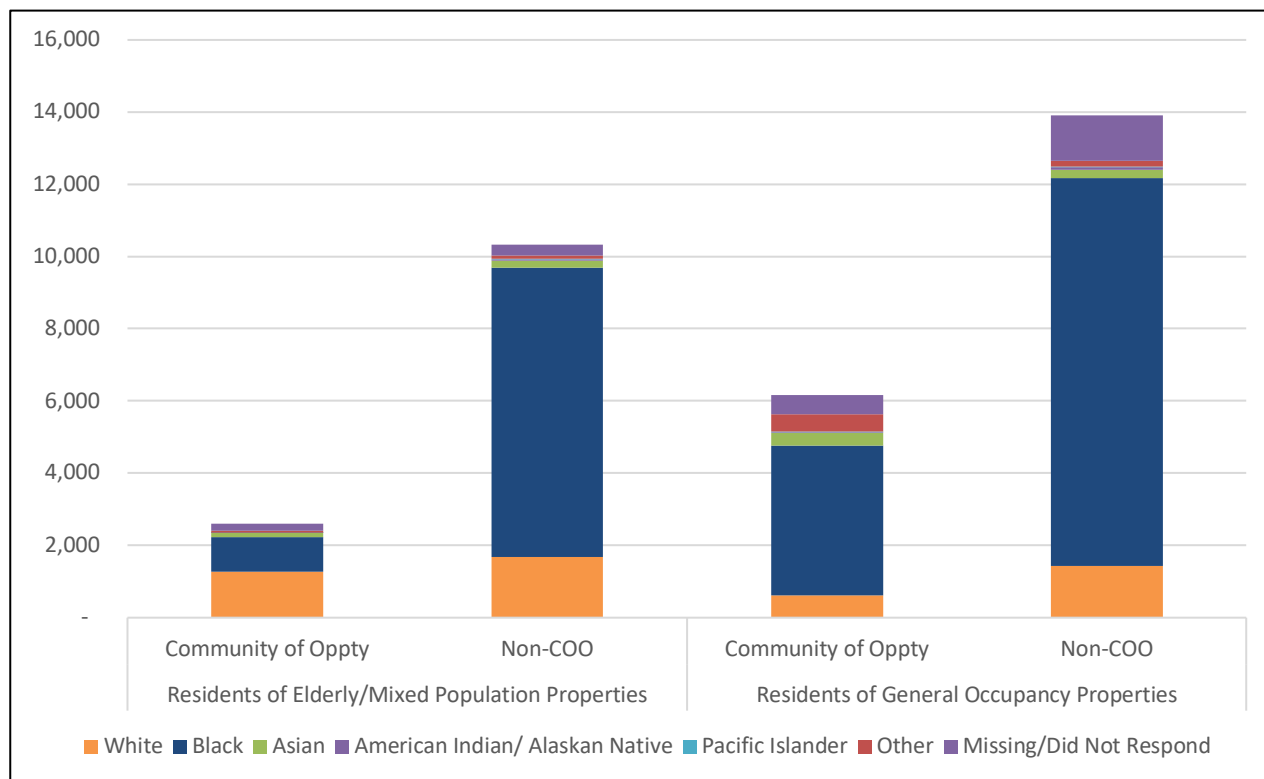
These charts above show some progress in more families with children having access to publicly assisted housing in higher opportunity areas. As part of affirmative marketing work done with Maryland DHCD coming out of our 2020 AI, though, we wanted to see if Black residents of the Baltimore region, who overall have disproportionately low access to high opportunity areas (see Section IV), have been able to gain access to these new opportunity-area homes.

The chart below includes residents of Baltimore-area LIHTC housing in 2021 that was within its 15-year federal compliance period. It reflects required federal reporting under the Housing and Economic Recovery Act (HERA) of 2008, and it includes the first of the 1,050 new LIHTC units to open as part of DHCD's awards to meet their 2017 fair housing voluntary conciliation agreement with HUD and complainants.

This chart shows that Black families in 2021 did tend to gain access to general occupancy LIHTC units in Communities of Opportunity (COOs) – a rate of 67%. This is actually far above the rate at which Black seniors accessed LIHTC homes in COOs – more like 36%.

This chart also shows the disproportionate rate at which Black residents rely on LIHTC homes – representing 72% of the residents of LIHTC properties within their 15-year federal compliance period.

**Figure VI-12**  
**Residents of Baltimore-Area LIHTC Properties by Race and DHCD**  
**Community of Opportunity (COO)**



Source: Maryland DHCD, BMC, and Baltimore Neighborhood Indicators Alliance (BNIA); data only includes residents of LIHTC properties still within their 15-year compliance period.

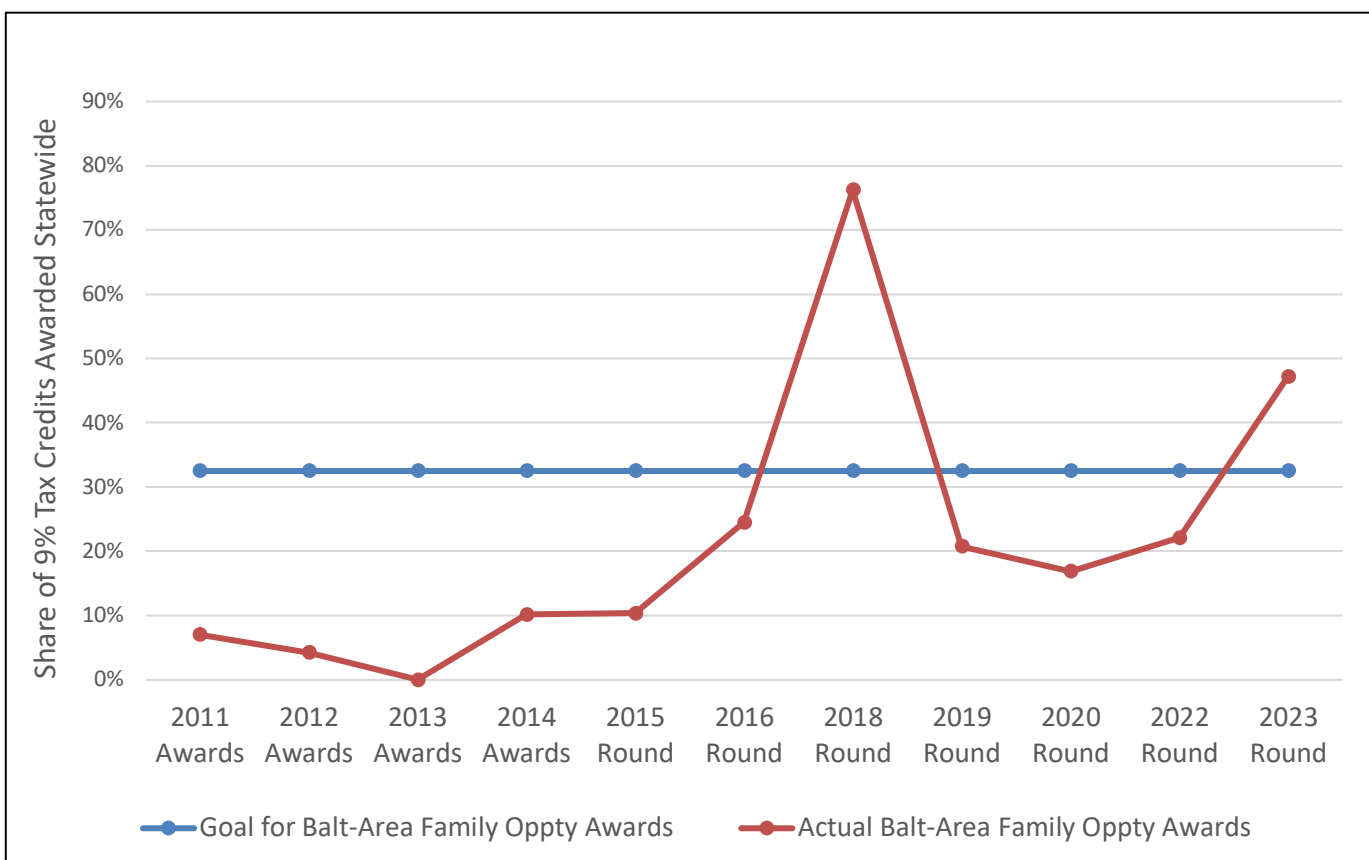
Because of the importance of LIHTC awards to the location of new publicly assisted housing, and because the location of competitive 9% LIHTC awards can be influenced through scoring for policy reasons, HUD entitlement jurisdictions in the Baltimore region have been tracking the location of competitive LIHTC awards and seeking to influence them since our 2012 Regional AI. Our 2020 AI for the first time said we would try to influence Maryland's 9% LIHTC competitive process with the goal of at least half Maryland's 9% LIHTC being awarded in the Baltimore region (home to half the State's demand for affordable housing), and for 65% of those Baltimore-area LIHTC to go to general occupancy developments in Communities of Opportunity.

This goal was designed to continue compensating for the many years when LIHTC were awarded overwhelmingly in lower-opportunity areas, leading to the 2011 fair housing complaint. The remaining 35% of 9% LIHTC would be directed to historically disinvested areas with comprehensive plans to build opportunity, including HUD-designated Choice Neighborhoods sites.

Figure VI-13 below tracks the combination of these two goals: 65% of 50% of the State's 9% LIHTC awards going to Baltimore-Area Communities of Opportunity (COOs) means the goal is for 32.5% of State 9% awards to go to Baltimore-area COOs. This excludes Queen Anne's

County, which we see as not well connected for low-income families to the job centers of the Baltimore metropolitan area.

**Figure VI-13.**  
**Maryland 9 Percent Low Income Housing Tax Credit Awards in Baltimore-Area Communities of Opportunity 2011-2019**



These awards reflect the following trends:

- 2011-2013 awards reflect the conditions that led to the 2011 fair housing complaint against the State of Maryland. The Baltimore region generally received a larger share of credits than its 50% of low-income renters in the State, but those credits mainly went to elderly-restricted housing or to general occupancy housing in portions of Baltimore City outside Communities of Opportunity (COOs), leaving less than 10% of statewide awards coming to Baltimore-area COOs.
- In 2013, with support from the Baltimore Regional Fair Housing Group, Maryland DHCD ended the local approval requirement for LIHTC awards. The 2014 General Assembly then formalized and extended that decision. This contributed to a slight rise in general occupancy awards in COOs in the Baltimore region to about 10% in 2014 and 2015.

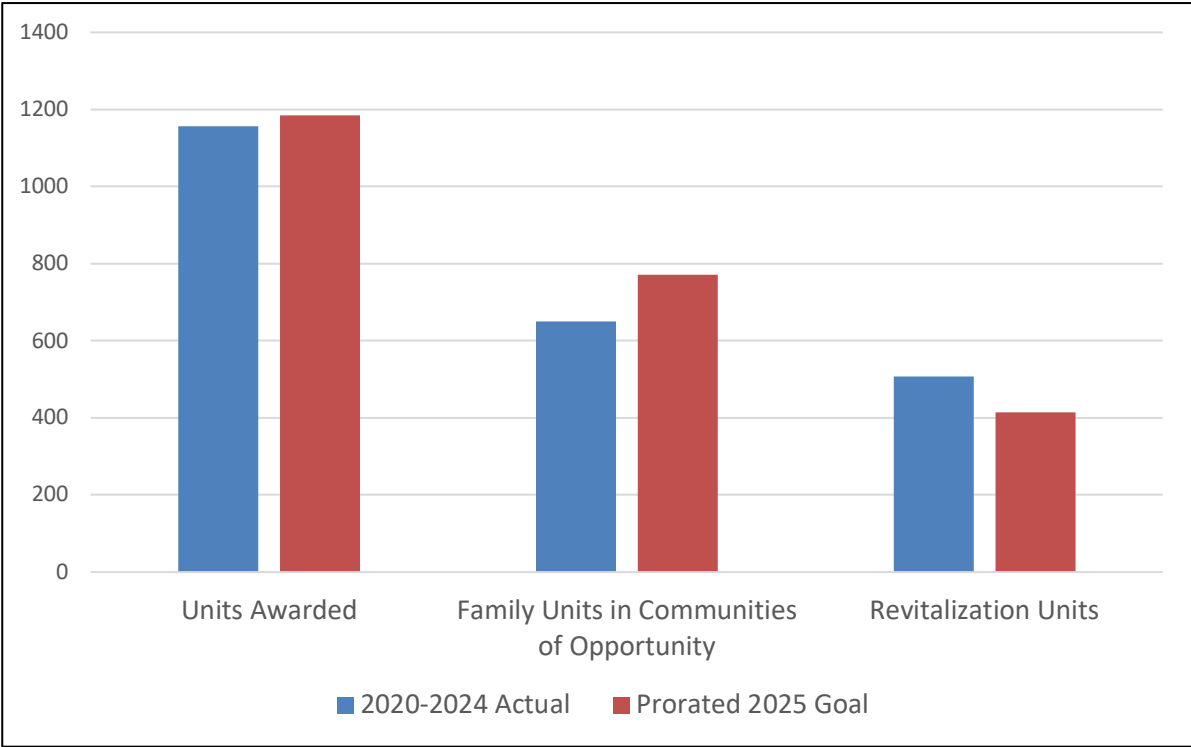
- For the 2016 round, Maryland DHCD added significant incentives for general occupancy housing in Communities of Opportunity. This resulted in a significantly larger share of family housing in COOs statewide, but more than half of those awards went to rural portions of the state. That left Baltimore-area COOs still receiving only 24% of statewide awards.
- In 2018, Maryland DHCD had just settled the 2011 complaint and instituted significant incentives for family housing in Communities of Opportunity in the Baltimore region. The result was striking – 76% of all statewide awards came to Baltimore-area COOs. Those 2018 awards included two COO awards in Baltimore City, along with two revitalization awards.
- Maryland DHCD's 2019 Qualified Allocation Plan dropped virtually all of the 2016-2018 COO incentives except for the 30% State basis boost for family developments in Communities of Opportunity, and the share of statewide awards going to Baltimore-area COOs hovered around 20% for the next three rounds.
- The Regional Fair Housing Group urged Maryland DHCD to reinstitute COO scoring incentives, but with a focus on the Baltimore and Washington metropolitan areas that are home to 80% of the State's low-income renting population. DHCD introduced a modest incentive in 2020 that did not affect awards and increased it incrementally in 2023 in a way that also did not affect awards.
- The Fair Housing Group urged Maryland DHCD also to incentivize revitalization awards in areas with broader and coordinated investments, such as the redevelopment of Perkins and Somerset Homes in Baltimore City. DHCD added a significant five point incentive for Choice Neighborhoods awards in 2020. In 2023 DHCD reduced the incentive to two points, but expanded it to areas with HUD Choice Neighborhoods planning grants, not just the larger implementation grants. The Poe Homes public housing development in Baltimore City and Harbour House/Eastport Terrace in Annapolis both have planning grant awards.

Overall, the chart below shows 9% LIHTC awards compared to the prorated goals in our 2020 Regional AI. Largely because of the pandemic, Maryland DHCD awarded far fewer tax credits over the 2020, 2022, and 2023 rounds than our 2020 AI predicted, based on the trend at the time.

The Baltimore region received nearly half the 9% LIHTC awarded statewide, falling only 29 units short from a goal of 1,186. Because of the 2023 round, more than half of those units (56 percent) were for developments open to families in Communities of Opportunity. Still, the results were 121 short of our 65% goal (771 units).



**Figure VI-14.**  
**Baltimore-Area 9% LIHTC Awards 2020-2024 Compared to 2020 AI Prorated Goals**



Since scoring incentives and the State 30% basis boost for developments open to families in Communities of Opportunity only affect competitive 9% tax credits, and since most overall LIHTC-assisted units use 4% LIHTC, we wanted to see if there was a difference in the rate at which the two types of LIHTC-assisted family developments located in Communities of Opportunity.

DHCD had supplied us a data set of LIHTC properties that closed on their financing between July 1, 2010 and December 31, 2022, and which designated which type of LIHTC financing each received. This enabled us to do a partial analysis, looking only at properties that closed on their financing after July 1, 2010.

We did find a difference in this rate. General occupancy units assisted by 9% LIHTC that closed on their financing since July 1, 2010 were located in Communities of Opportunity nearly 1/3 of the time, higher than the 27% overall rate in Figure VI-12 above. Interestingly, this rate was far higher than that rate for home restricted to senior citizens, reversing the historical trend. This is likely due to the impact of the 2017 Voluntary Conciliation Agreement, which put an emphasis on homes that would be open to families.

**Figure VI-15.**  
**Share of Baltimore-Area 9% LIHTC Units Closed on Financing since July 1, 2010**

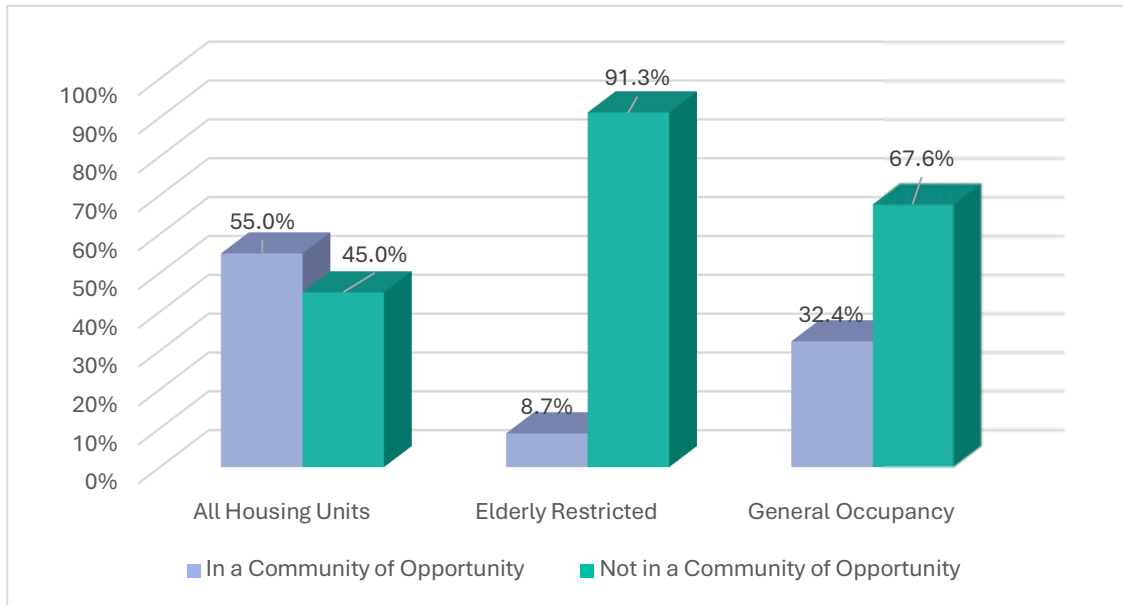
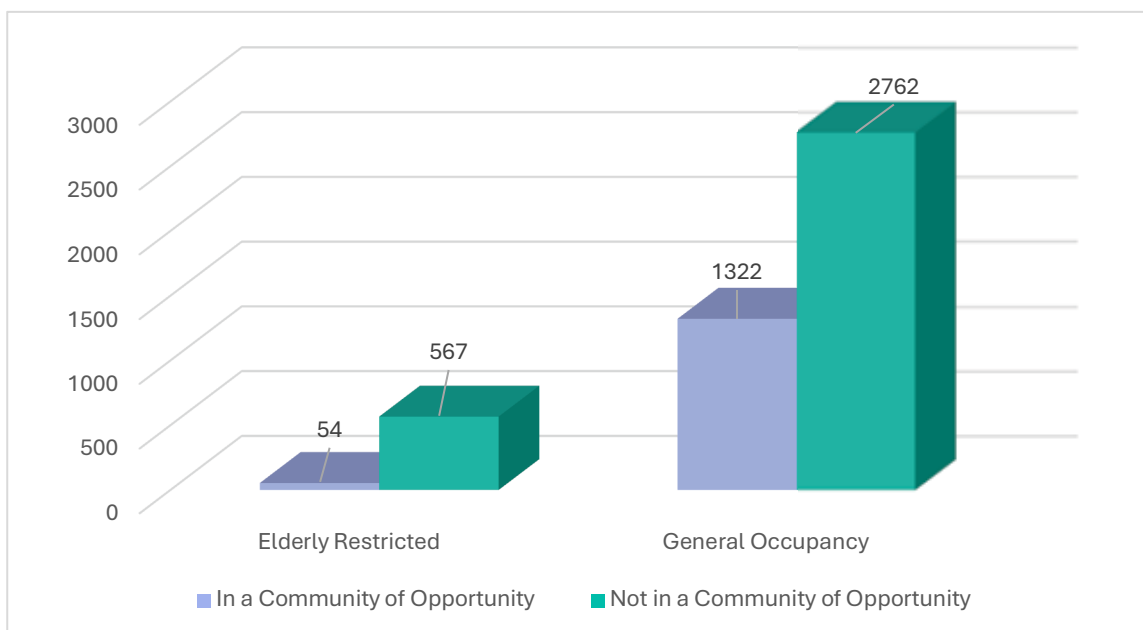


Figure VI-16 below, showing unit counts supports this interpretation. Far more 9% units open to families have closed on their financing since July 1, 2010 than units restricted to seniors.

**Figure VI-16.**  
**Number of Baltimore-Area 9% LIHTC Units Closed on Financing since July 1, 2010**



By contrast, Figure VI-17 below shows that only about 1/5 of units open to families assisted by 4% LIHTC are located in Communities of Opportunity.

**Figure VI-17.**  
**Share of Baltimore-Area 4% LIHTC Units Closed on Financing since July 1, 2010**

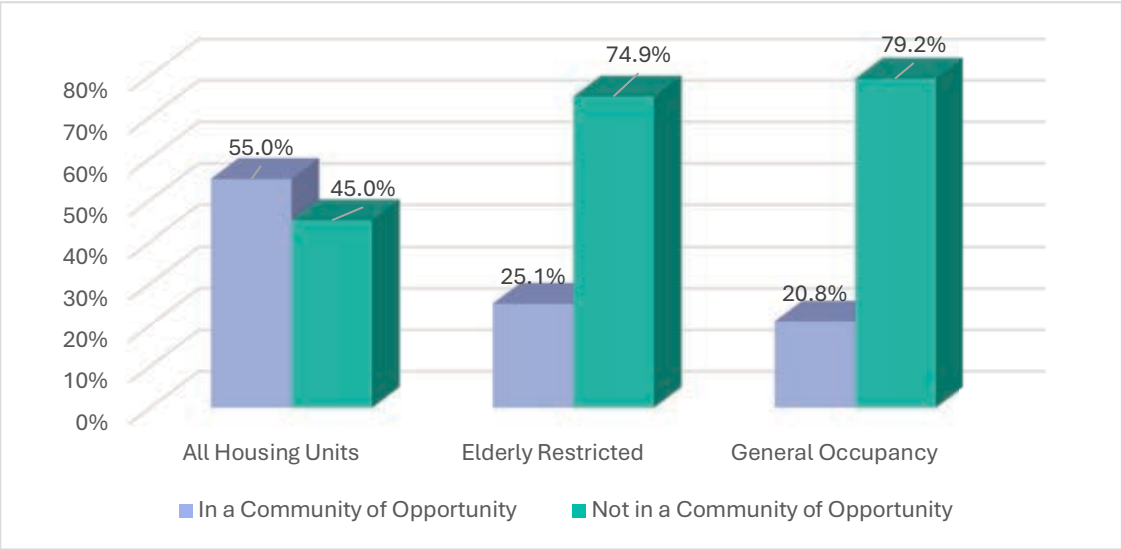
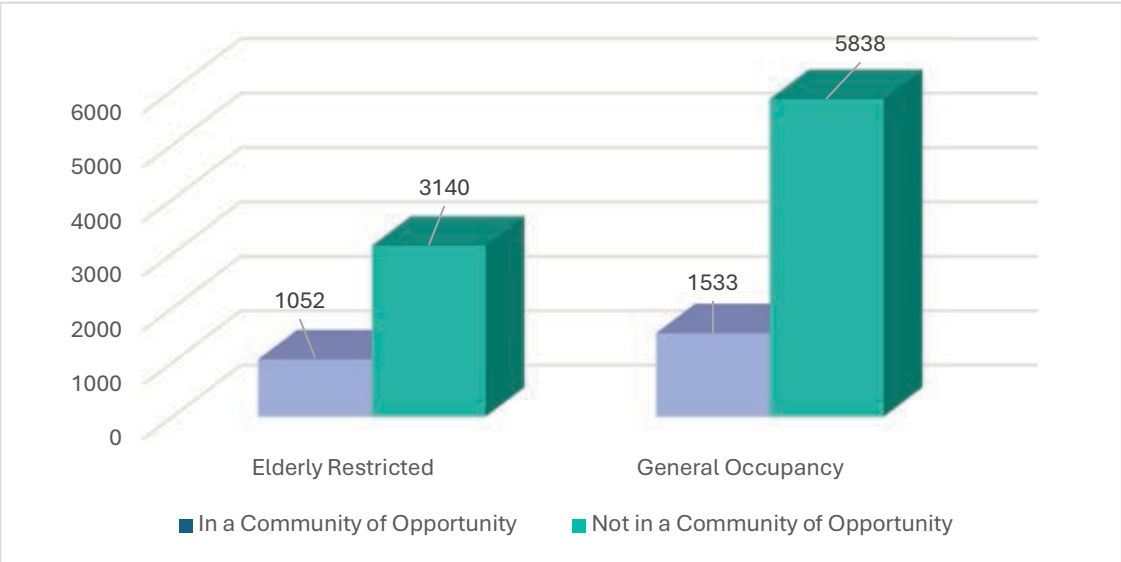


Figure VI-18 below shows just how many LIHTC-assisted units this is. The 7,371 total General Occupancy units supported by 4% LIHTC are almost twice the 4,084 units supported by 9% LIHTC over the same time period. Because of this, the 20.8% of 4% LIHTC-assisted family units in Communities of Opportunity is numerically more than the 32.4% of 9% units.

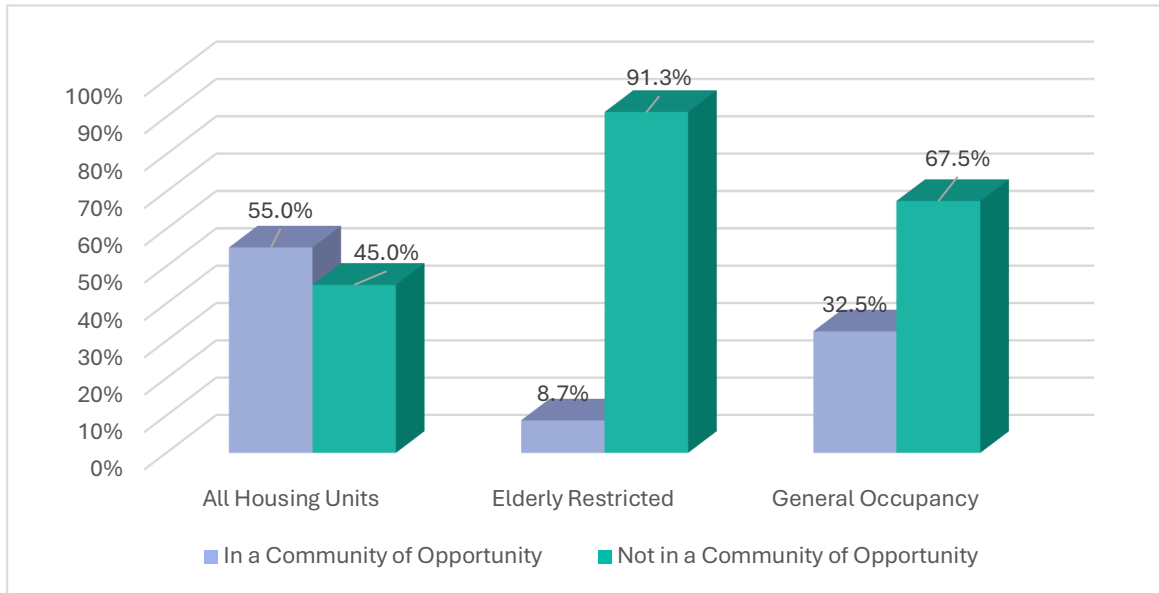
**Figure VI-18.**  
**Number of Baltimore-Area 4% LIHTC Units Closed on Financing since July 1, 2010**



Because nearly two-thirds of 4% LIHTC are used to preserve existing homes, we separated out newly constructed LIHTC units assisted by both types of LIHTC to see if the pattern was different, but the following two charts show the “share” pattern is nearly identical.

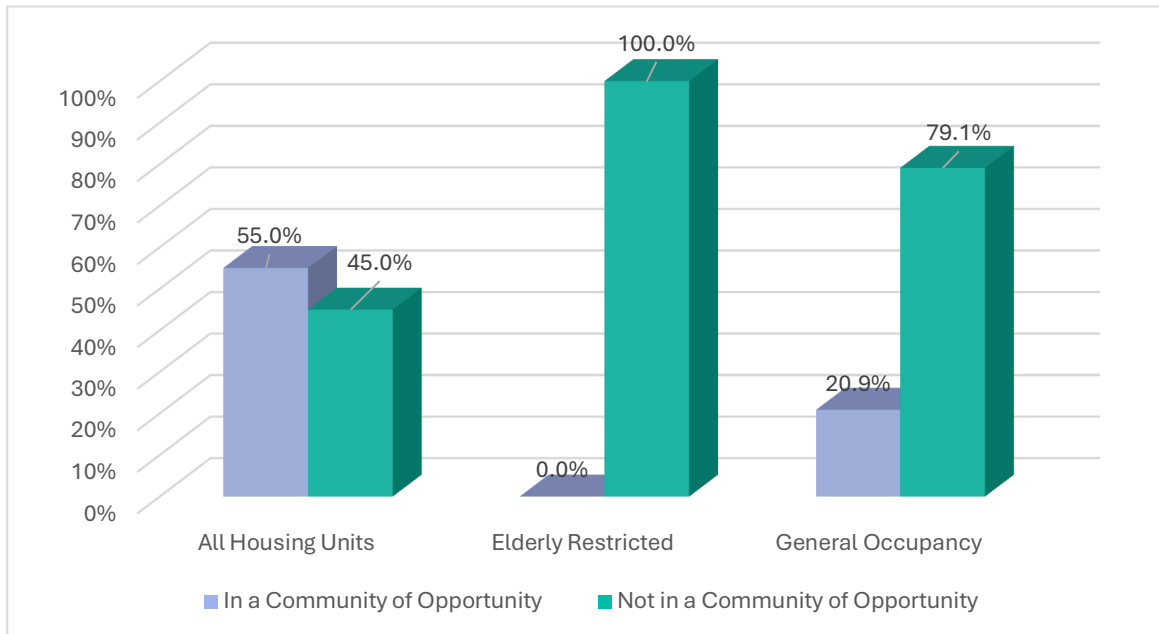
**Figure VI-19.**

**Share of Baltimore-Area 9% LIHTC New Construction Units Closed on Financing since July 1, 2010**



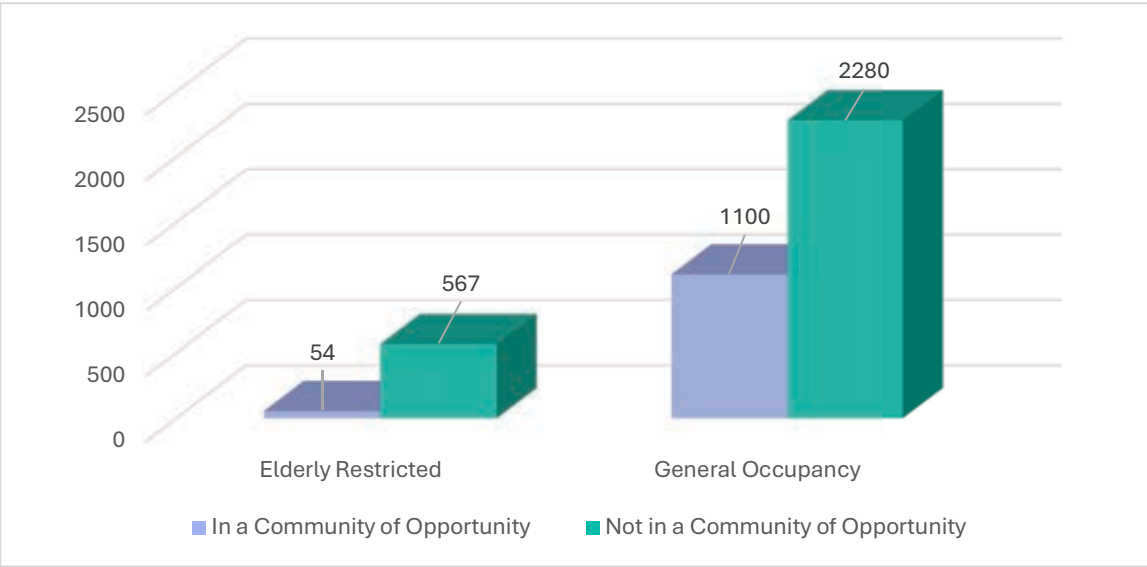
**Figure VI-20.**

**Share of Baltimore-Area 4% LIHTC New Construction Units Closed on Financing since July 1, 2010**

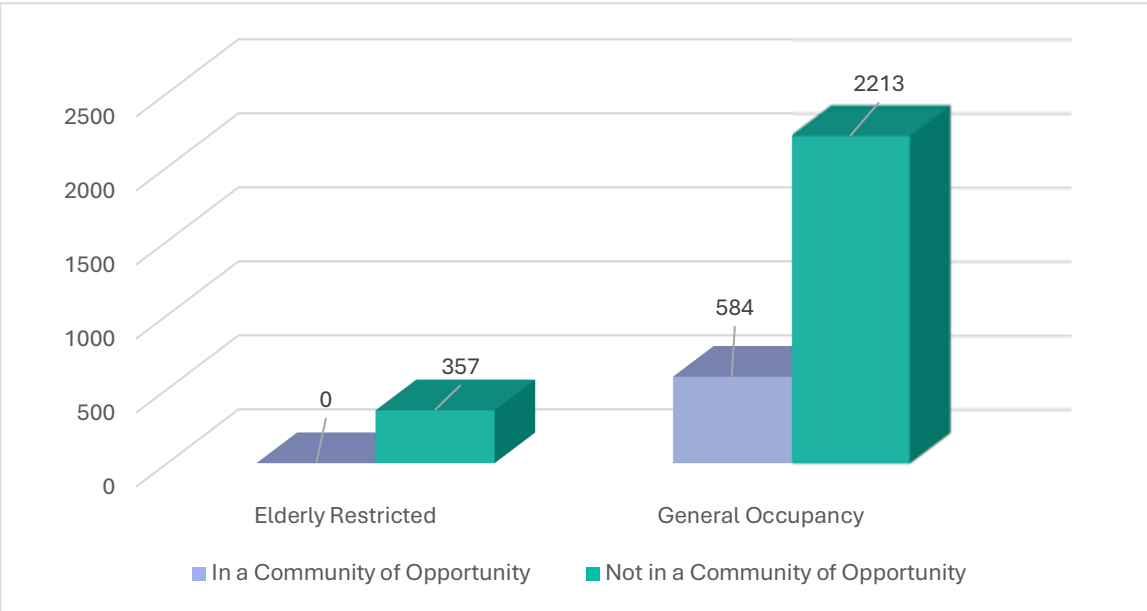


Looking at the raw number of new units, however, shows the importance of 9% credits. Since so many 4% LIHTC are used to rehabilitate existing homes, 9% credits create most of the new units in the region and nearly twice the number of new units in Communities of Opportunity.

**Figure VI-21.**  
**Number of Baltimore-Area 9% LIHTC New Construction Units Closed on Financing since July 1, 2010**



**Figure VI-22.**  
**Number of Baltimore-Area 4% LIHTC New Construction Units Closed on Financing since July 1, 2010**

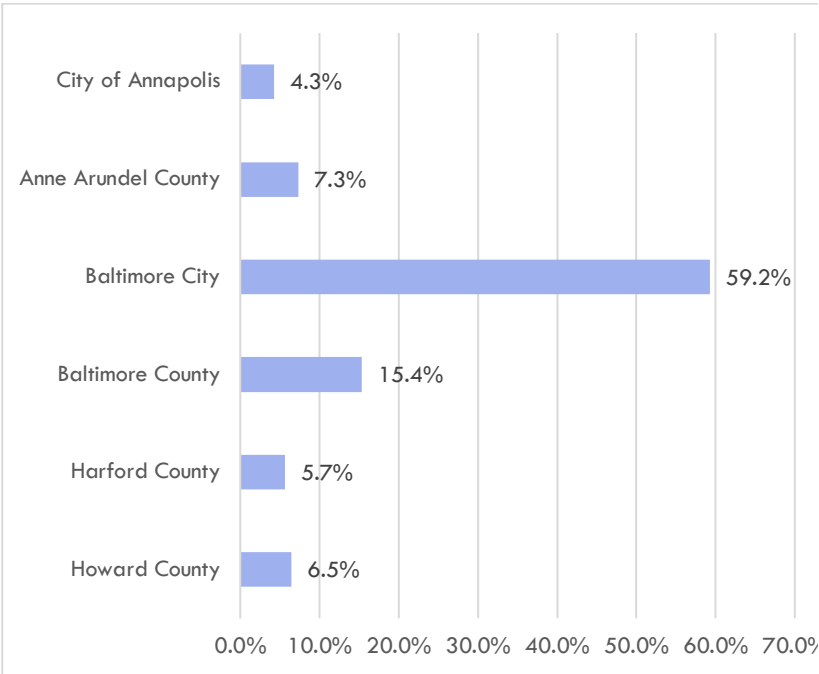


This analysis supports the emphasis of our 2020 and 2025 regional action plans on the scoring criteria for awarding 9% LIHTC. The 9% LIHTC competitive criteria will be responsible for locating the majority of new publicly assisted homes in the region and needs to overcome the lower rate at which 4% LIHTC site homes open to families where their children can live in safe communities and attend high-performing public schools. And using 9% LIHTC to site these new homes open to families in Communities of Opportunity will enable 4% LIHTC to rehabilitate and preserve them later.

**Total publicly supported housing.** The distributions shown in the graph below are virtually identical to those in our 2020 Regional AI. Baltimore City continues to have by far the largest share of the region’s publicly supported housing units. That share, however, along with Baltimore County’s share, have declined slightly since our 2020 analysis, while Anne Arundel and Howard’s shares have grown slightly.

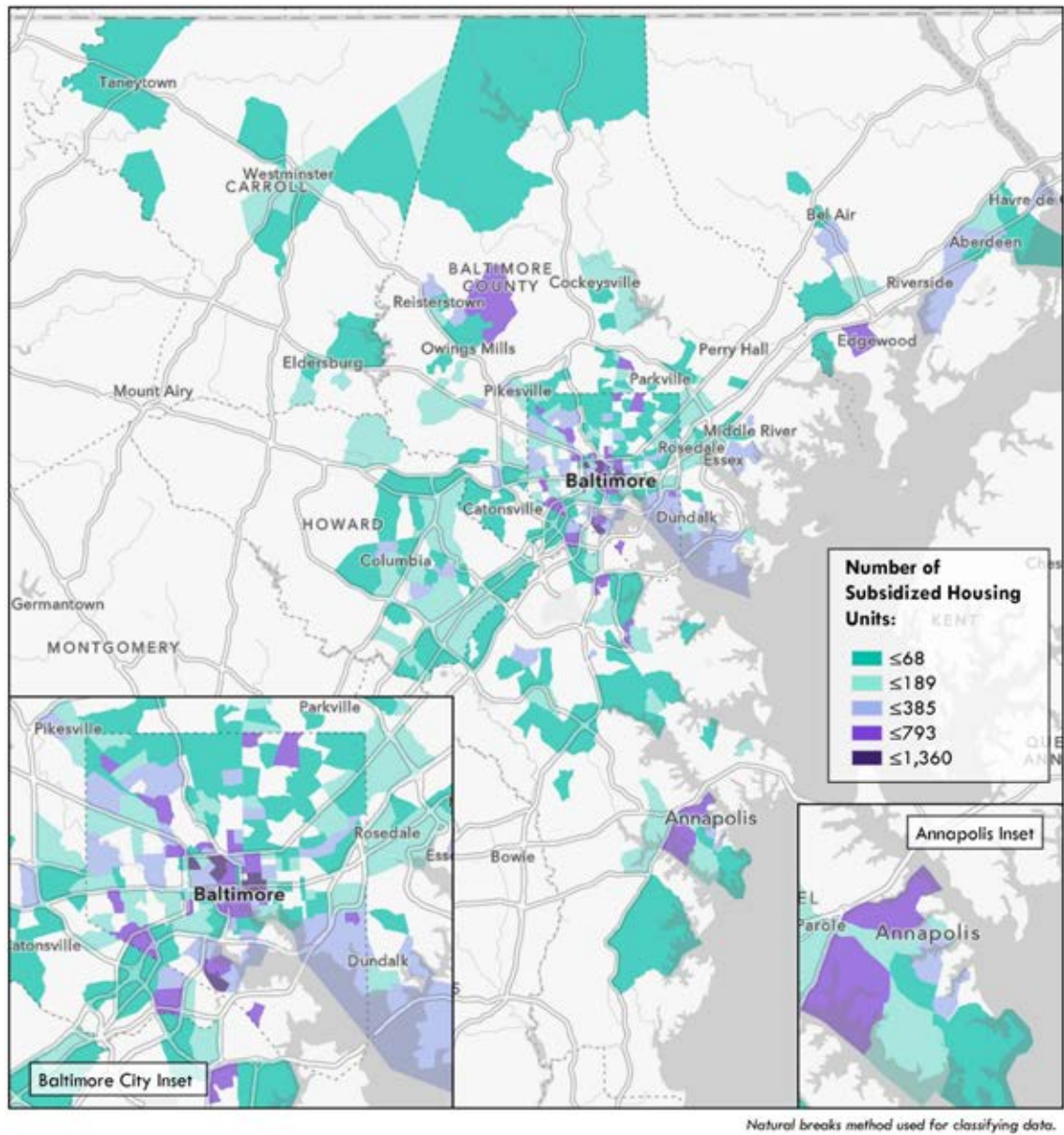
**Figure VI-23.**  
**Distribution of All**  
**Assisted Units by**  
**Jurisdiction**

Source:  
BMC, BNIA.



The map in the figure below shows the location of the region’s publicly assisted housing. The central part of Baltimore City continues to have the highest concentrations of publicly supported housing. These concentrations are closely aligned with areas historically redlined by the public and private sector, discussed in Section III. In the counties, there are very few concentrated Census tracts. Many Census tracts in the region have low to moderate numbers of units, and many have no publicly subsidized housing.

**Figure VI-24.**  
**Total Publicly Assisted Housing Units in the Baltimore Region**

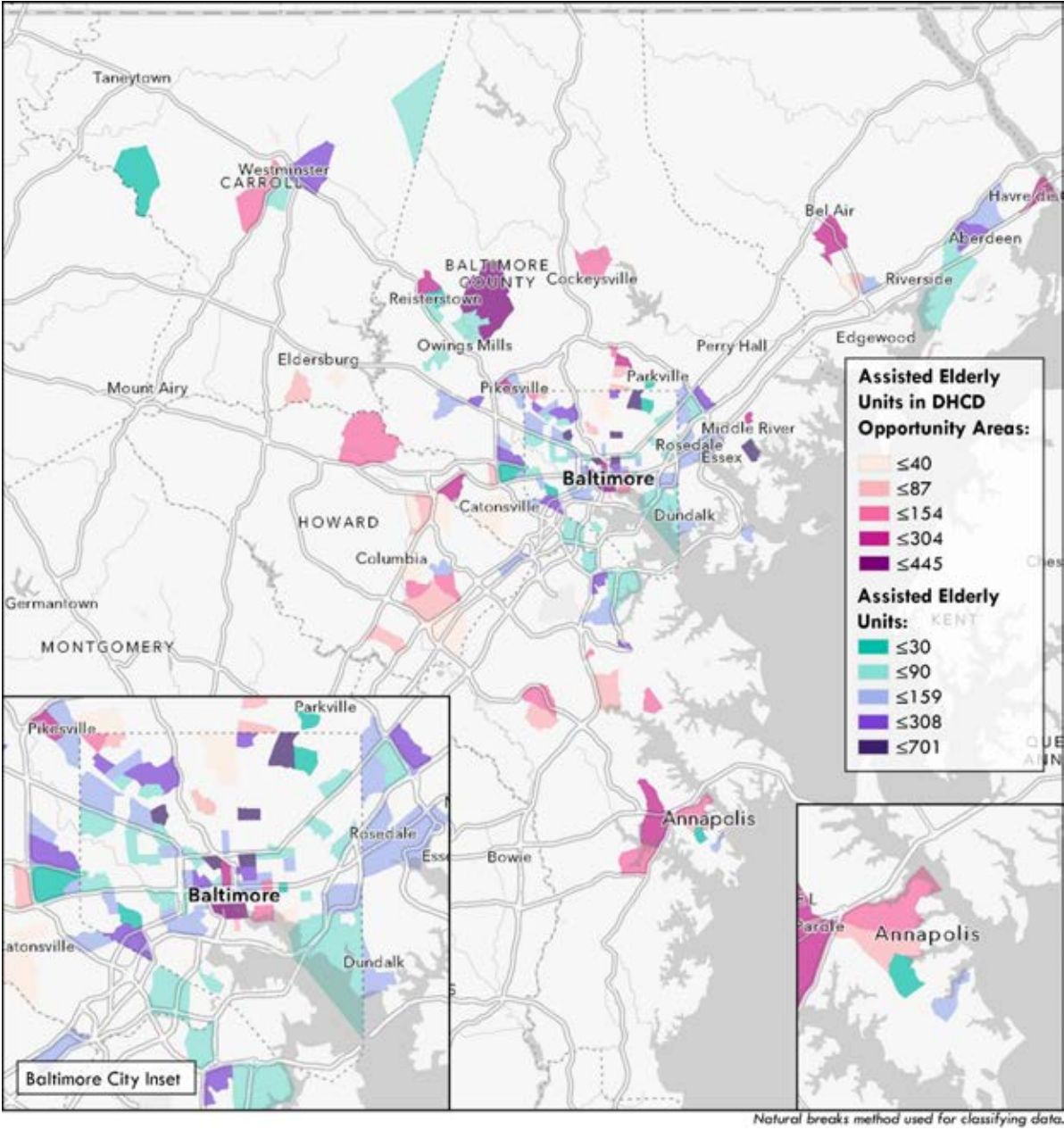


Source: BMC Preservation Database, BNIA analysis.



As in the LIHTC analysis, separating the assisted housing that is restricted to elderly residents and that which is open to families, and using an overlay of the Maryland Department of Housing and Community Development (DHCD) opportunity map from Section IV shows similar patterns with one key difference.

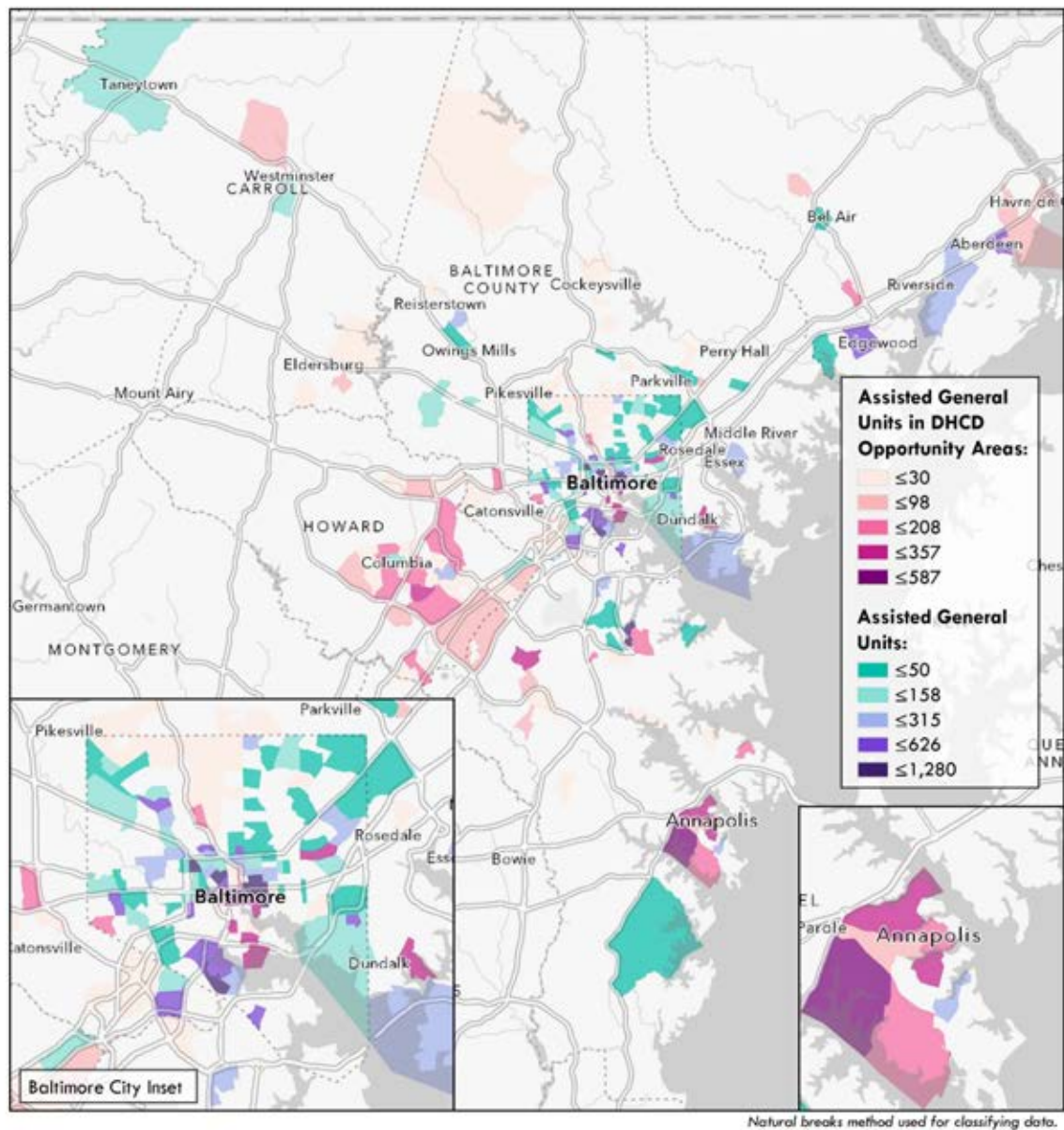
**Figure VI-25.**  
**Assisted Elderly Restricted Housing Units in the Baltimore Region,**  
**Showing Units in DHCD Opportunity Areas**



Source: BMC Preservation Database, BNIA analysis.

The map above of assisted housing restricted to elderly residents shows substantial concentrations of housing in both urban and suburban DHCD opportunity areas, in addition to concentrations outside opportunity areas.

**Figure VI-26.**  
**Assisted Rental Housing Units in the Baltimore Region Open to Families, Showing Units in DHCD Opportunity Areas**



Source: BMC Preservation Database, BNIA analysis.

The map above of assisted homes open to families shows relatively similar concentrations of assisted housing in DHCD opportunity areas in Howard and Anne Arundel Counties, as well as in northwest Baltimore County and Bel Air. The key difference is that the map of assisted homes open to families shows much greater concentration in certain non-opportunity census tracts.

The table below provides more detail on the distribution of both publicly subsidized rental homes by household type served compared to the distribution of total housing units in the region. Overall in the region, 55% of total housing units are located in DHCD high opportunity areas. This compares to 31% of subsidized units for elderly and 26% of subsidized units for families. As in the analysis of LIHTC-assisted rental units compared to Maryland DHCD Communities of Opportunity, there are more total assisted rental units restricted to elderly residents in DHCD Communities of Opportunity than there are assisted units open to families. By jurisdiction:

- Howard County stands out because nearly all census tracts are located in high opportunity areas—and this is also true of general occupancy assisted units (even more so than elderly assisted units).
- Anne Arundel County also has a high share of total housing units in high opportunity areas and about half of assisted units in high opportunity areas.
- Baltimore City has a relatively low share of total units located in high opportunity areas and even fewer assisted units: 15.5% of elderly assisted units and only 11.2% of general occupancy units are located in high opportunity areas.
- Harford County has the largest disparity between total units and general occupancy assisted units with just 15.9% of general occupancy assisted units in high opportunity areas (elderly assisted units, however, are on par with total units).
- Baltimore County also has a smaller share of general occupancy assisted units in high opportunity areas than elderly units, although the disparity is less than Harford County's.

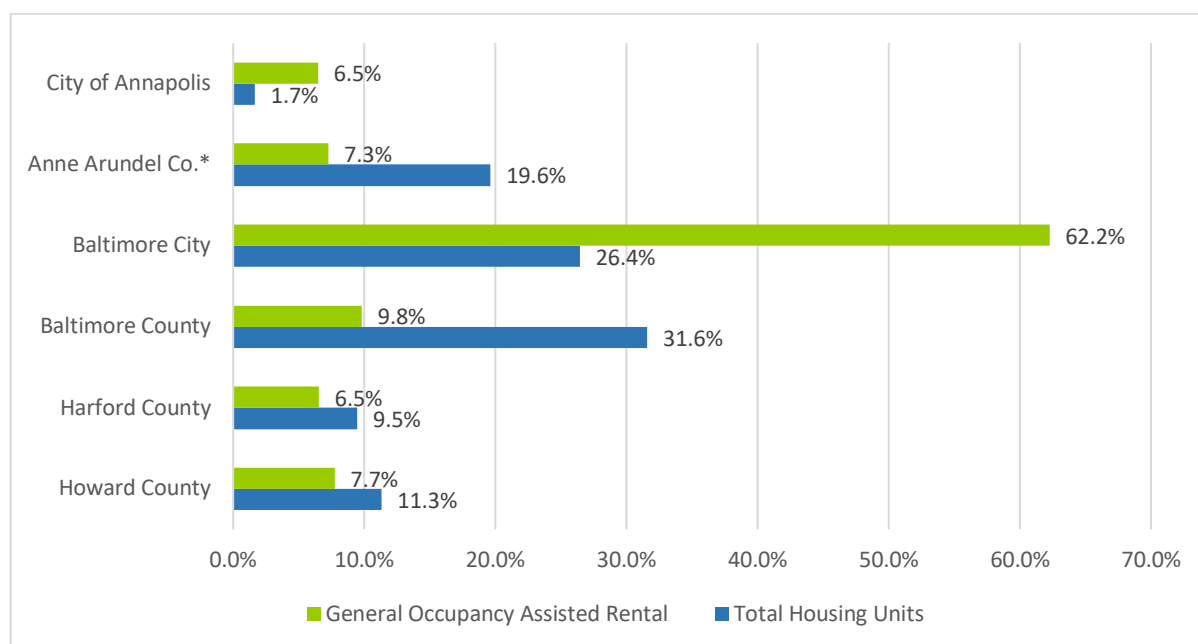
**Figure VI-27.**  
**Publicly Supported Rental Housing Compared to Total Housing Units**

	Housing Units in DHCD Opportunity Areas			Total Housing Units			Share of Each Unit Type in DHCD Opportunity Areas		
	Elderly Assisted*	General Occupancy Assisted*	Total Housing Units	Elderly Assisted*	General Occupancy Assisted*	Total Housing Units	Elderly Assisted*	General Occupancy Assisted*	Total Housing Units
City of Annapolis	225	1,646	15,633	346	1,844	18,400	65.0%	89.3%	85.0%
Anne Arundel County (outside of Annapolis)	738	1,047	160,883	1,588	2,071	218,086	45.6%	50.6%	73.8%
Baltimore City	1,424	1,990	79,635	9,179	17,771	293,879	15.5%	11.2%	27.1%
Baltimore County	1,863	735	178,031	4,755	2,802	351,123	39.2%	26.2%	50.7%
Harford County	538	297	57,696	1,070	1,865	105,205	50.3%	15.9%	54.8%
Howard County	767	1,825	118,475	1,017	2,208	125,818	75.4%	82.7%	94.2%
<b>Totals</b>	<b>5,555</b>	<b>7,540</b>	<b>610,353</b>	<b>17,955</b>	<b>28,561</b>	<b>1,112,511</b>	<b>30.9%</b>	<b>26.4%</b>	<b>55.0%</b>

Note: \*Publicly assisted rental housing.

Source: BMC, BNIA.

**Figure VI-28.**  
**Jurisdictions' Share of Region's General Occupancy Assisted Rental Homes**  
**Compared to Share of Region's Total Housing Units**



**Note:** \*Outside the City of Annapolis.

Source: BMC.

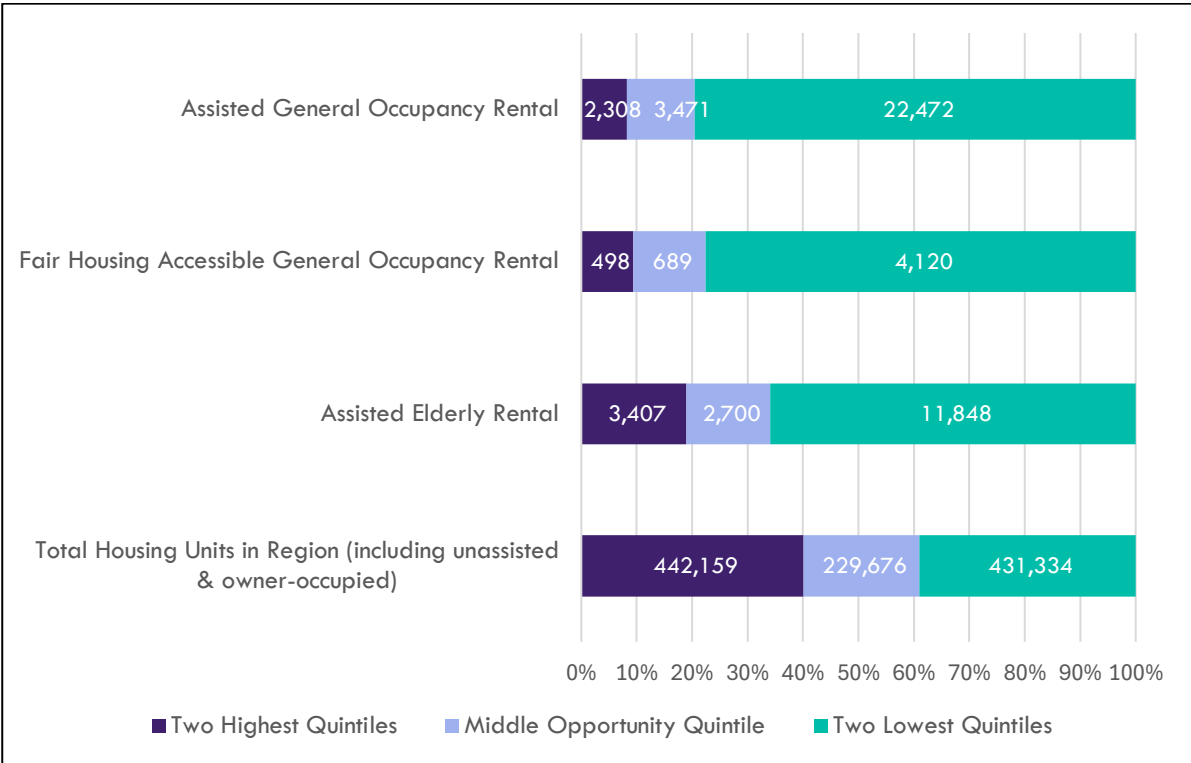
The chart above shows the overall distribution of general occupancy publicly assisted rental housing among HUD entitlement jurisdictions of the Baltimore region, and it is very similar to the corresponding chart in our 2020 plan. The Cities of Annapolis and Baltimore are still the only jurisdictions with a higher share of the region's general occupancy assisted rental housing than their share of the region's total housing units. Baltimore City's is more than twice as high, while Annapolis' is almost four times higher. All of the rest of the region's HUD entitlement counties (with the City of Annapolis removed from Anne Arundel County statistics) have more of the region's housing than the region's general-occupancy assisted rental housing, with the gaps particularly large for Anne Arundel and Baltimore Counties. Overall, these statistics suggest that publicly supported housing that is open to families remains concentrated in the urban areas of the metropolitan area even as housing more generally has become more suburbanized.

In addition to looking at publicly supported housing and total housing units compared to Maryland DHCD's Communities of Opportunity, this fair housing analysis also compares this housing with a new quintile opportunity map prepared for us by the Baltimore Regional Housing Partnership (BRHP) based on the map BRHP uses for this Housing Choice Voucher regional mobility program. (See Section VI.) In general, this analysis shows the

same patterns, although with a lower share of publicly assisted housing located in the two highest opportunity quintiles. Like DHCD's Communities of Opportunity, though, total housing units having the highest likelihood of being located in high opportunity areas (40%), followed by publicly assisted housing restricted to elderly residents (19%), and finally publicly assisted housing open to families (8%). This analysis actually shows a higher number of assisted elderly units in the two highest opportunity quintiles than units open to families.

This analysis also included the subset of general-occupancy assisted housing that meets the Fair Housing Act standard for accessibility for people with an ambulatory disability. At the regional level, those units are slightly more likely to be in opportunity areas (9%) than the full universe of general occupancy assisted housing in the region.

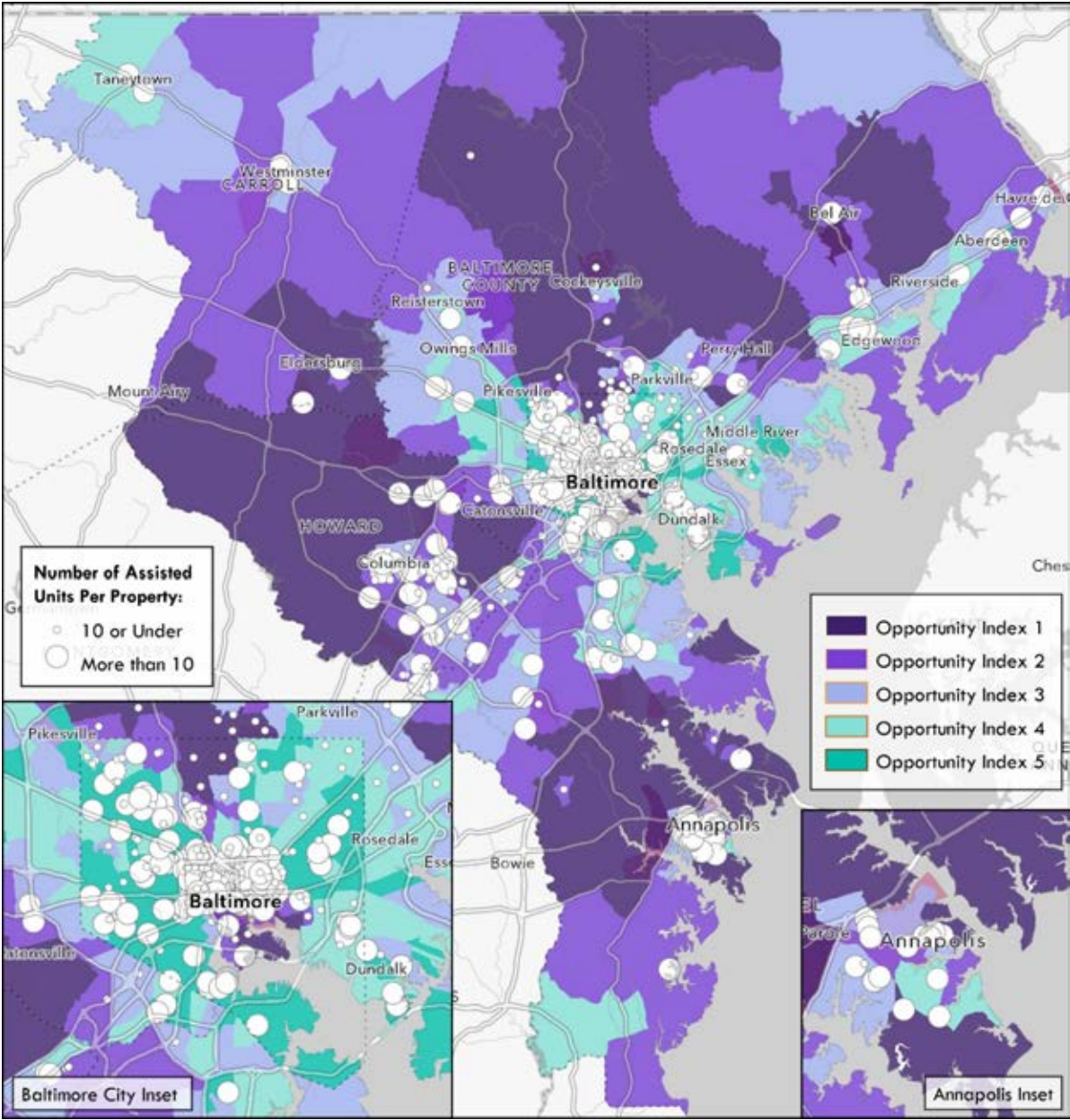
**Figure VI-29.**  
**Regional Unit Comparison**



Source: BMC.



**Figure VI-30.**  
**Distribution of General Occupancy Publicly Assisted Housing Compared to 2024 Opportunity Quintiles**



Note: In this analysis, Quintiles 1 and 2 are considered highest opportunity areas of the metropolitan area.

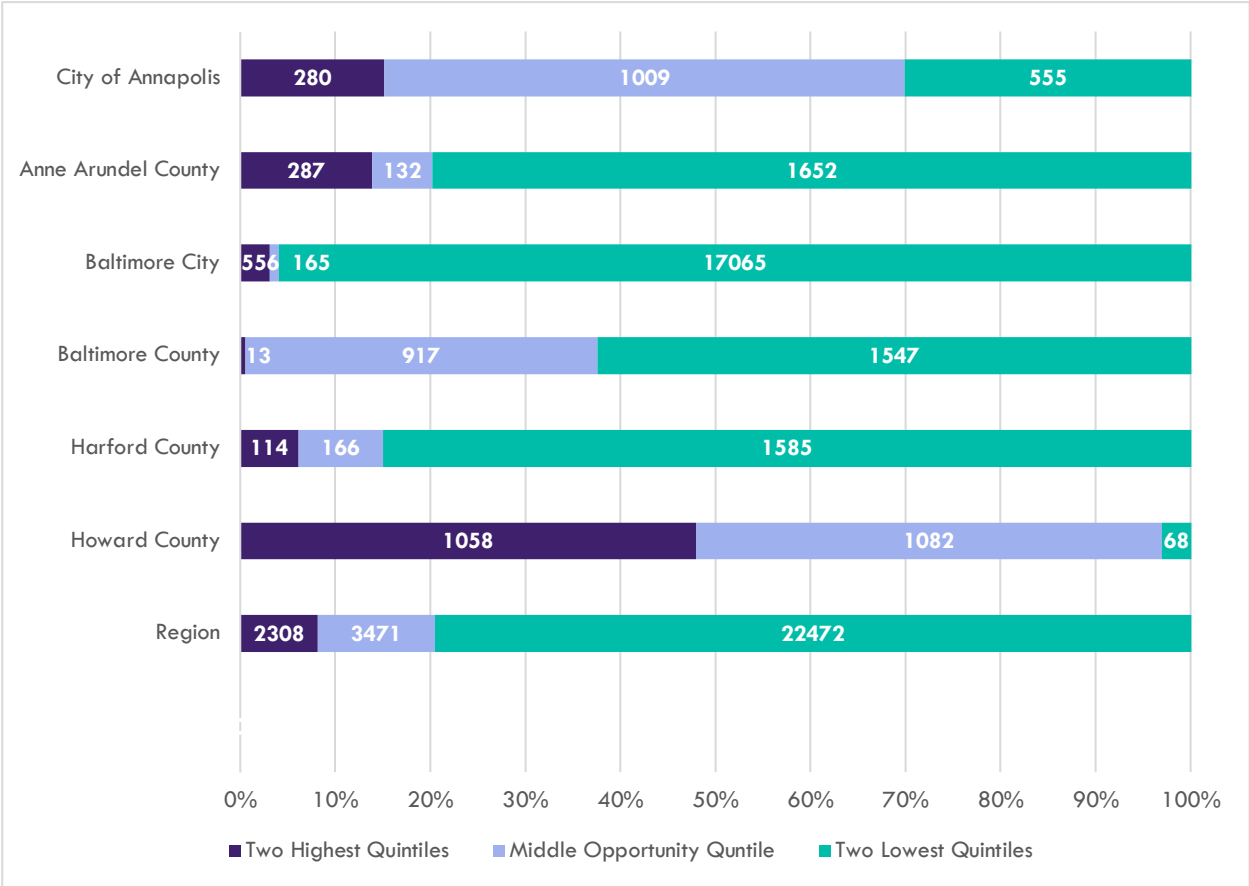
Source: BMC, BNIA.

The map above shows the distribution of assisted rental units open to general occupancy compared to the quintiles from the 2024 opportunity map created for this study by the Baltimore Regional Housing Partnership. In this analysis, quintiles 1 and 2 are considered high opportunity areas, quintiles 4 and 5 are considered low opportunity areas, and quintile 3 designates middle opportunity areas. This map also distinguishes between sites



with more than 10 assisted units and sites or Census tracts with 10 or fewer assisted units – often scattered site homes.

**Figure VI-31.**  
**Distribution of General Occupancy Publicly Assisted Housing by Jurisdiction and Opportunity Quintile**



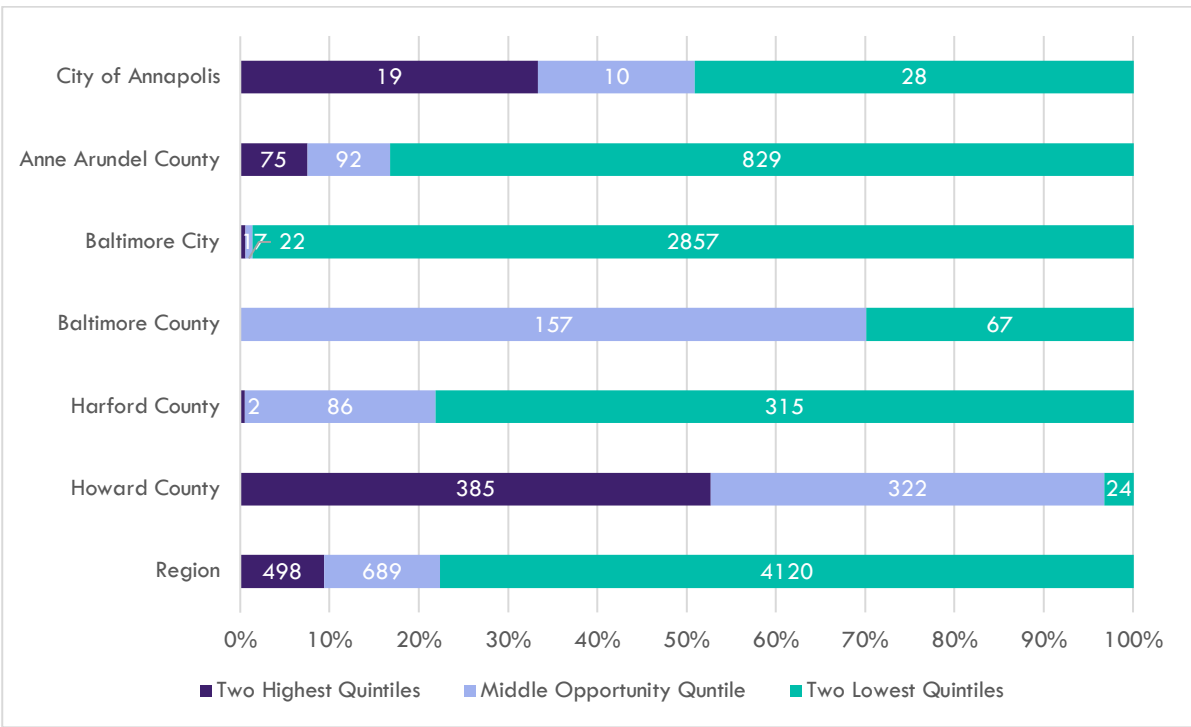
Source: BMC, BNIA.

The graph above shows the numeric and proportional distribution of general occupancy assisted rental units by jurisdiction. Howard County has the largest proportion of assisted units in those high opportunity areas (48%). The City of Annapolis (15%) and Anne Arundel County (14%, not including the City of Annapolis) have the next highest proportions, followed by Harford County (6%), Baltimore City (3%), and Baltimore County (0.5%) with the lowest proportions. The regional rate of only 8% in high opportunity areas is heavily influenced by the high number of units overall in Baltimore City and the low proportion there in high opportunity areas.

It should be noted that our 2024 opportunity map, generally using BRHP’s opportunity indicators, shows opportunity shifted outward in several ways. The 2014 map used in our 2020 AI included indicators like walk score, access to transit, and racial diversity that helped

offset other indicators like educational opportunity, employment, and poverty. As a result, the middle quintile in this 2024 map most likely represents significant opportunity, too. In fact, the map that BRHP uses to administer its regional Housing Choice Voucher mobility program includes much of this middle quintile in its more binary opportunity designation. Even adding in that middle quintile, however, only results in one-fifth of our region's publicly assisted housing that is open to families being located in the relatively high opportunity areas of the region. 80% of this housing is still located in the lowest opportunity 40% of the metropolitan area.

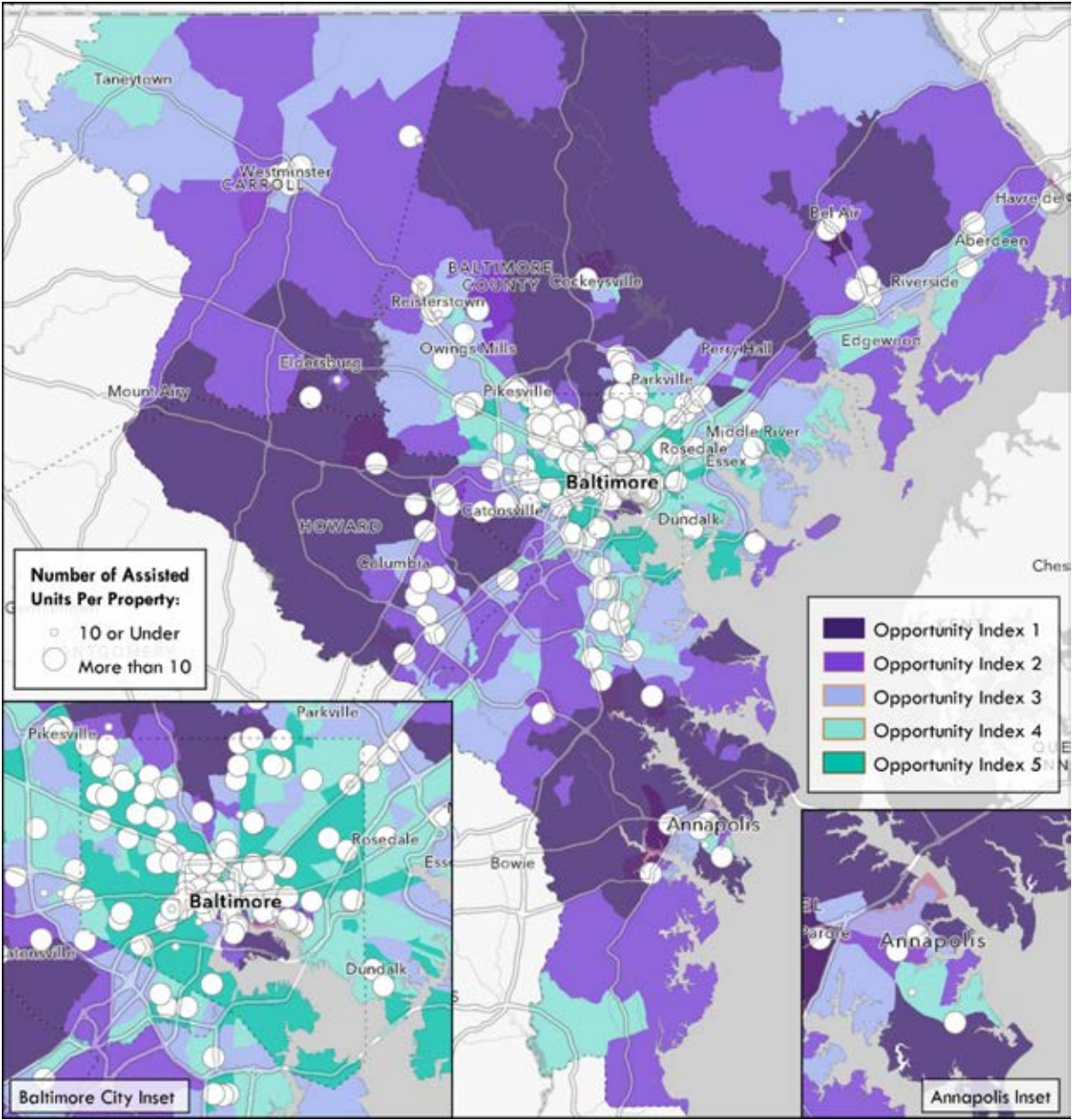
**Figure VI-32.**  
**Assisted General Occupancy Units Meeting Fair Housing Act Standard for**  
**People with Ambulatory Disability**



Source: BMC, BNIA.

The figure above represents the subset of general occupancy assisted rental units that meet Fair Housing Act (FHA) standards for people with an ambulatory disability. Regionally just over 9% of these units are in high opportunity areas of our new quintile opportunity map, higher than the general occupancy units as a whole.

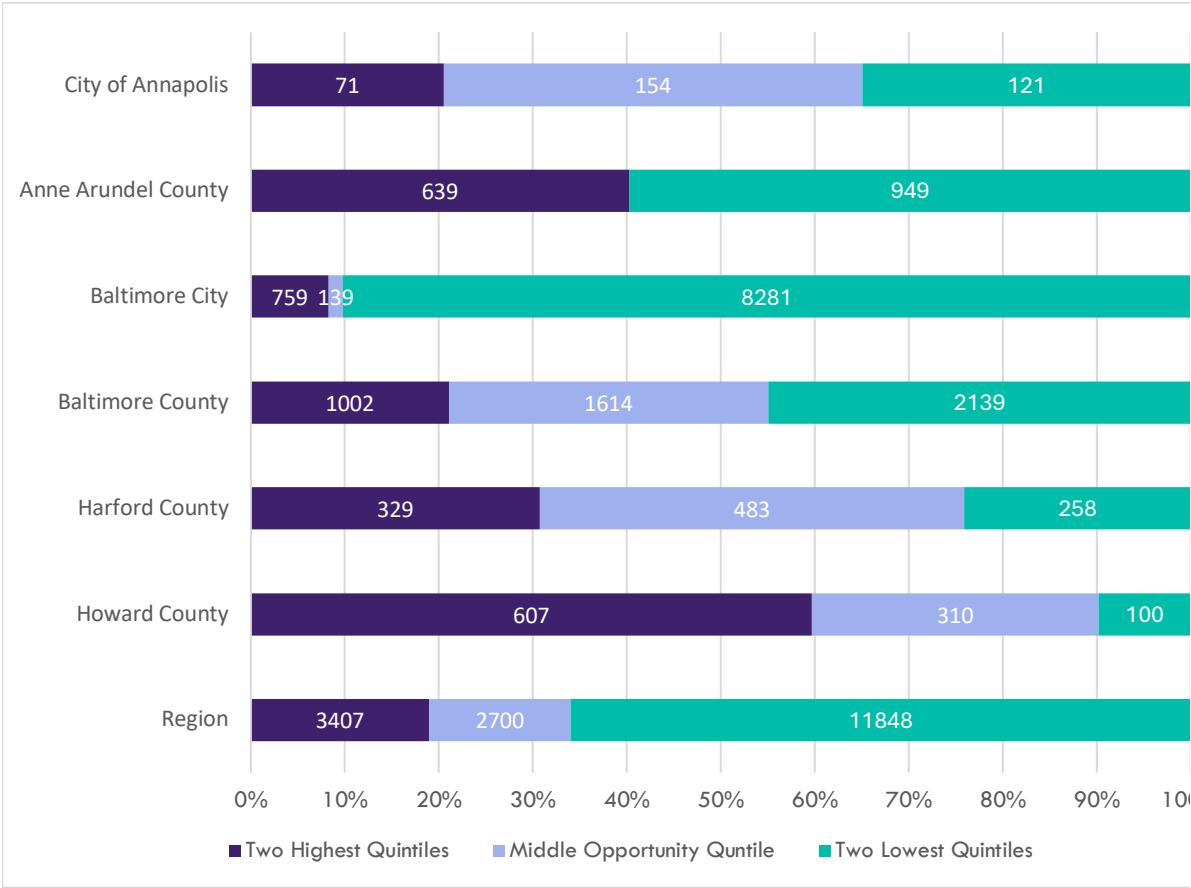
**Figure VI-33.**  
**Publicly Assisted Rental Homes Restricted to Senior Citizens Compared to**  
**2014 Regional Housing Plan Opportunity Quintiles**



Source: BMC, BNIA.

The map above shows the distribution of publicly supported rental housing restricted to senior citizens compared to our 2024 opportunity quintiles. Again, quintiles 1 and 2 are considered high opportunity areas, quintiles 4 and 5 are considered low opportunity areas, and quintile 3 designates middle opportunity areas.

**Figure VI-34. Publicly Assisted Rental Homes Restricted to Senior Citizens by Jurisdiction**



Source: BMC, BNIA.

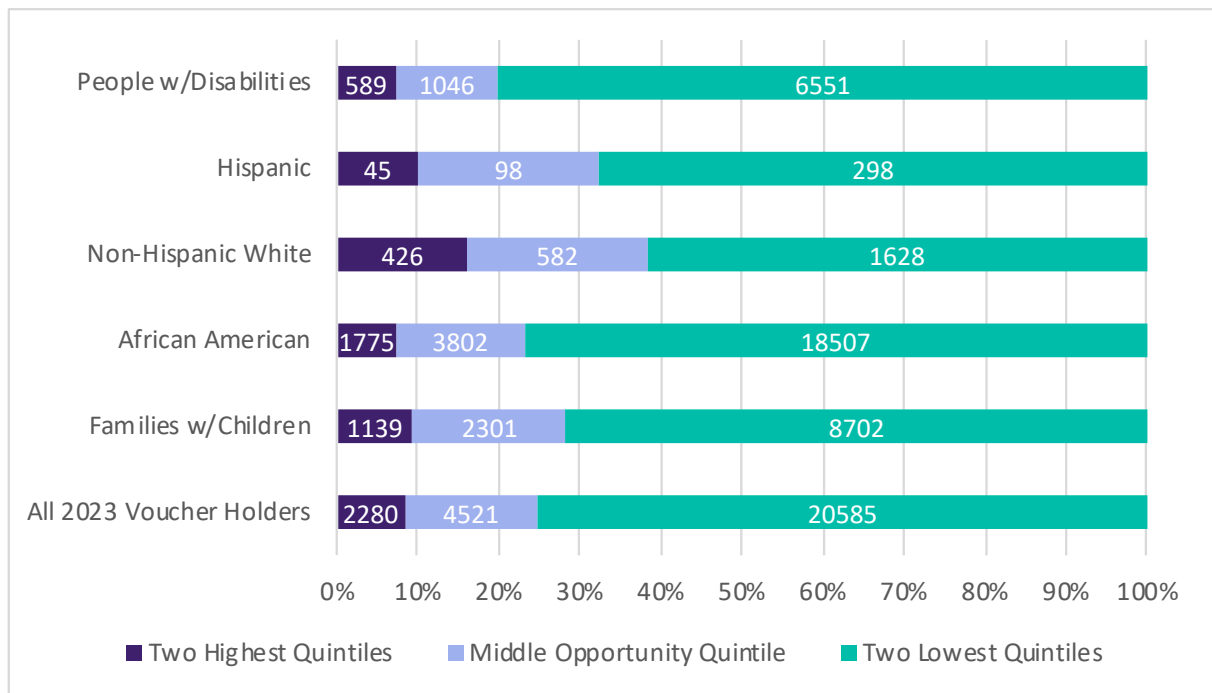
The chart above shows the units on the map in table form by jurisdiction. Every jurisdiction in the metropolitan area has a higher share of assisted elderly units in high opportunity areas than general occupancy units. Again, Howard County is highest at 60 percent. For elderly units, Anne Arundel (not including the City of Annapolis) is next at 40 percent, followed by Harford County at 31 percent. Annapolis and Baltimore County are then next, both at 21 percent. In Baltimore City, only 8% of senior units are in high opportunity areas. The regional average of 19% means that publicly assisted homes restricted to seniors are more than twice as likely to be in high opportunity areas than publicly assisted general occupancy homes. Including the middle quintile still means more than 1/3 of senior assisted homes are in the highest three opportunity quintiles, compared to only 1/5 of general occupancy assisted homes.

**Housing Choice Vouchers (HCVs).** When the Housing Choice Voucher Program was introduced as the new Section 8 program in the 1970s, the idea was that publicly assisted housing residents would no longer be restricted to impoverished public housing

locations and could live in a wide variety of places. This section examines how well voucher programs are working to broaden affordable housing choice in the region.

The figure below shows there is still progress to be made. Compared to our 2024 quintile Opportunity Map, only 8% of all voucher holders lived in the top two opportunity quintiles in 2023, with a full three-quarters living in the two lowest opportunity quintiles. Families with children were slightly more successful, at 9% in the highest opportunity quintiles, likely because of the regional mobility program run by the Baltimore Regional Housing Partnership. White voucher holders, while relatively small in overall numbers, are twice as successful at accessing the highest opportunity areas. Black voucher holders overall and people with disabilities are the least successful, only accessing the highest opportunity quintiles 7% of the time.

**Figure VI-35.**  
**Regional Voucher Holder Comparisons, 2023**

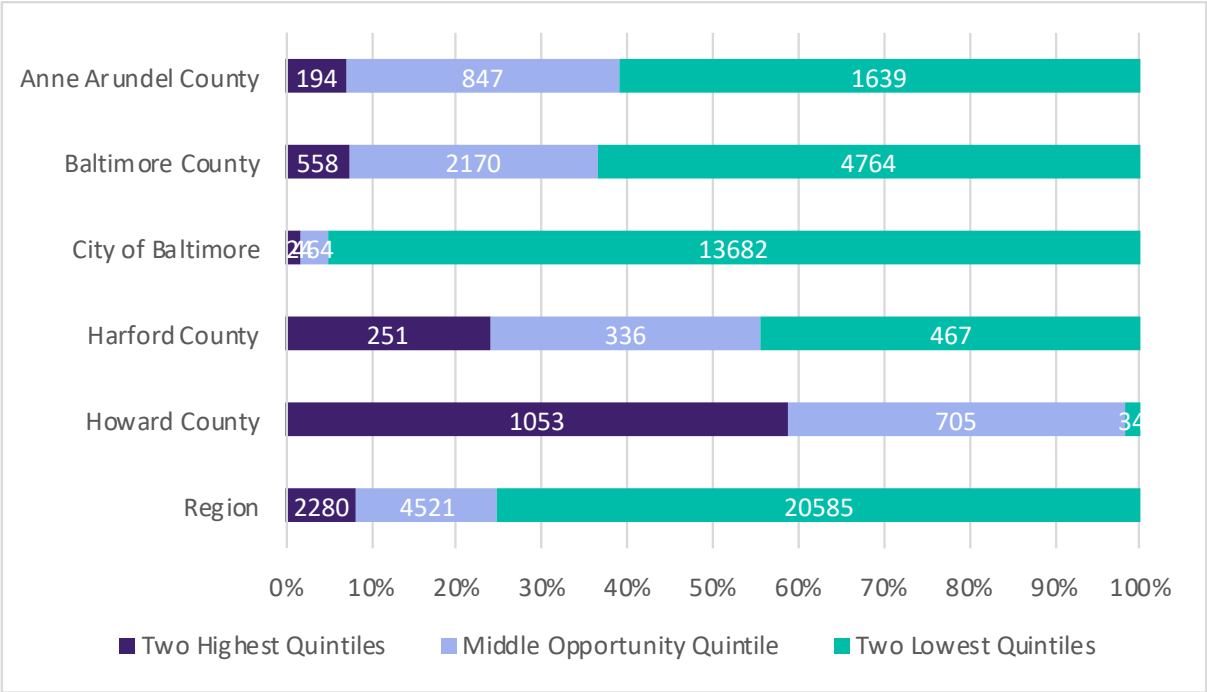


Source: HUD (voucher data), BMC (opportunity quintiles).

The figure below breaks out total voucher usage by jurisdiction, although separate data for the City of Annapolis is not available. Like the figures for assisted housing units, voucher holders in generally high-opportunity Howard County live in the two highest opportunity quintiles at the highest rate—59 percent. Next highest is Harford County at 24 percent. Anne Arundel and Baltimore County both have only 7% of voucher holders living in the two highest opportunity quintiles, although both have about 30% of voucher holders living in the middle opportunity quintile. Baltimore City has only 2% of voucher holders living in the

highest opportunity quintiles and 95% living in the lowest opportunity two quintiles, which comprise the vast majority of the City.

**Figure VI-36.**  
**Number of Voucher Holders Living in Opportunity Tracts, 2023**

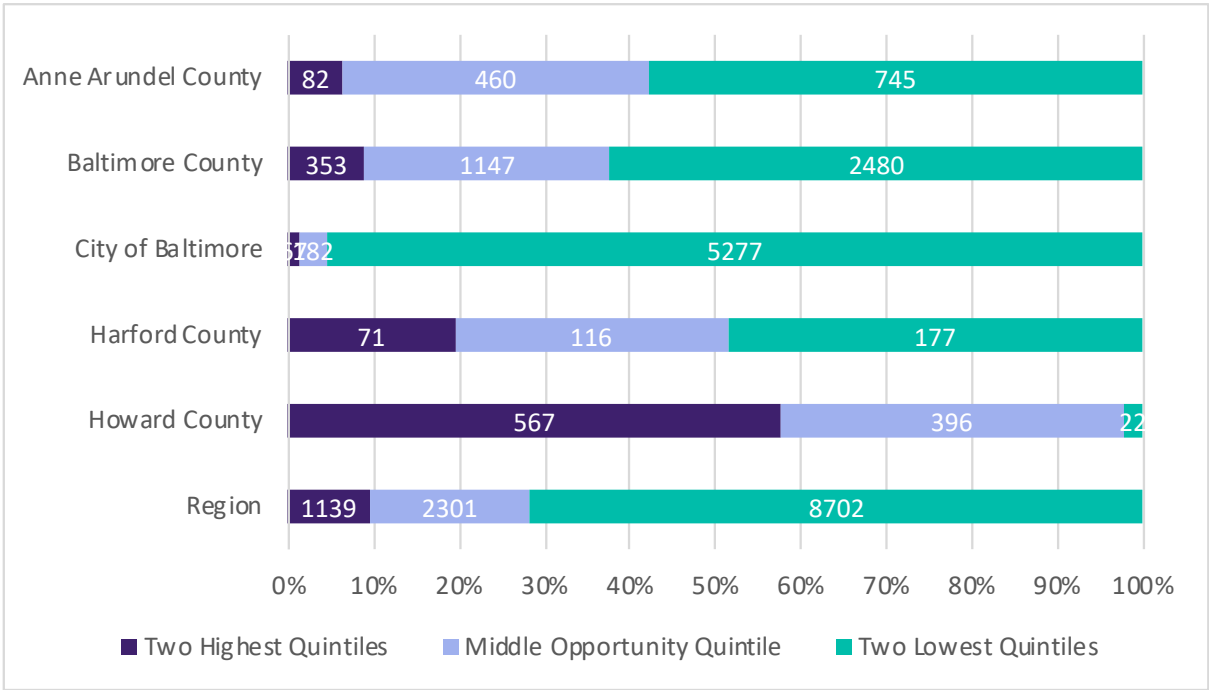


Source: HUD, BMC.

These jurisdictional patterns generally hold true for families with children in the figure below, with about half of all voucher holders in high opportunity areas in the region having children. Families with children access the highest opportunity quintiles at a higher rate in Baltimore County, driving that rate higher region-wide. Families with children access the top three opportunity quintiles at greater rates than voucher holders overall in both Baltimore and Anne Arundel Counties.



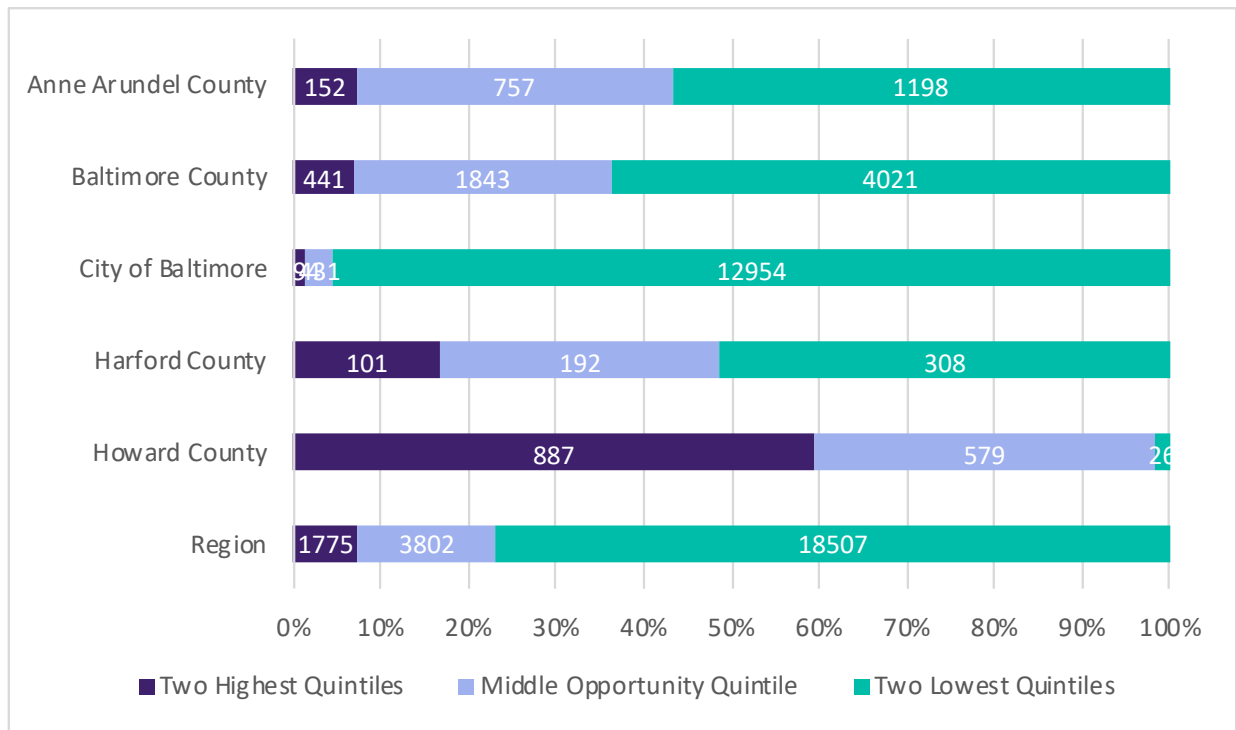
**Figure VI-37.**  
**Number of Voucher Holders with Children in Opportunity Tracts, 2023**



Source: HUD, BMC.

The chart below shows that, in the jurisdictions with voucher holders in high opportunity areas at the highest rates – Howard and Harford Counties, African Americans also live in opportunity areas at high rates. This is probably not surprising, given that African Americans comprise 88% of voucher holders region-wide. Black voucher holders accessing high opportunity areas at lower rates in Harford County and Baltimore City bring the regional rate for African American voucher holders slightly lower than for voucher holders as a whole.

**Figure VI-38.**  
**Number of Voucher Holders who are African American Living in Opportunity Tracts, 2023**



Source: BMC.

The chart below shows the figures above in percentage form by jurisdiction. Differences among resident groups include:

- In Anne Arundel County, voucher holders who are non-Hispanic White are more likely to be living in low opportunity tracts than Black voucher holders. The share of non-Hispanic White voucher holders by opportunity area is very similar to that of persons with disabilities, suggesting that White residents with disabilities are concentrated in low opportunity areas. Black voucher holders, whose distribution is similar to that of families with children, are more likely to live in medium opportunity tracts.
- Baltimore County has a similar distribution of voucher holders among resident groups, indicating parity in access to units that accept vouchers regardless of protected class. This is also true of Baltimore City—although the uniformity is driven by the high number of voucher holders living in low opportunity areas.
- Harford and especially Howard Counties stand out for their relatively low share of households living low opportunity areas.
- Harford County also stands out because it is the only county with a noticeably lower share of non-Hispanic White voucher holders living in low opportunity areas compared to Black voucher holders.

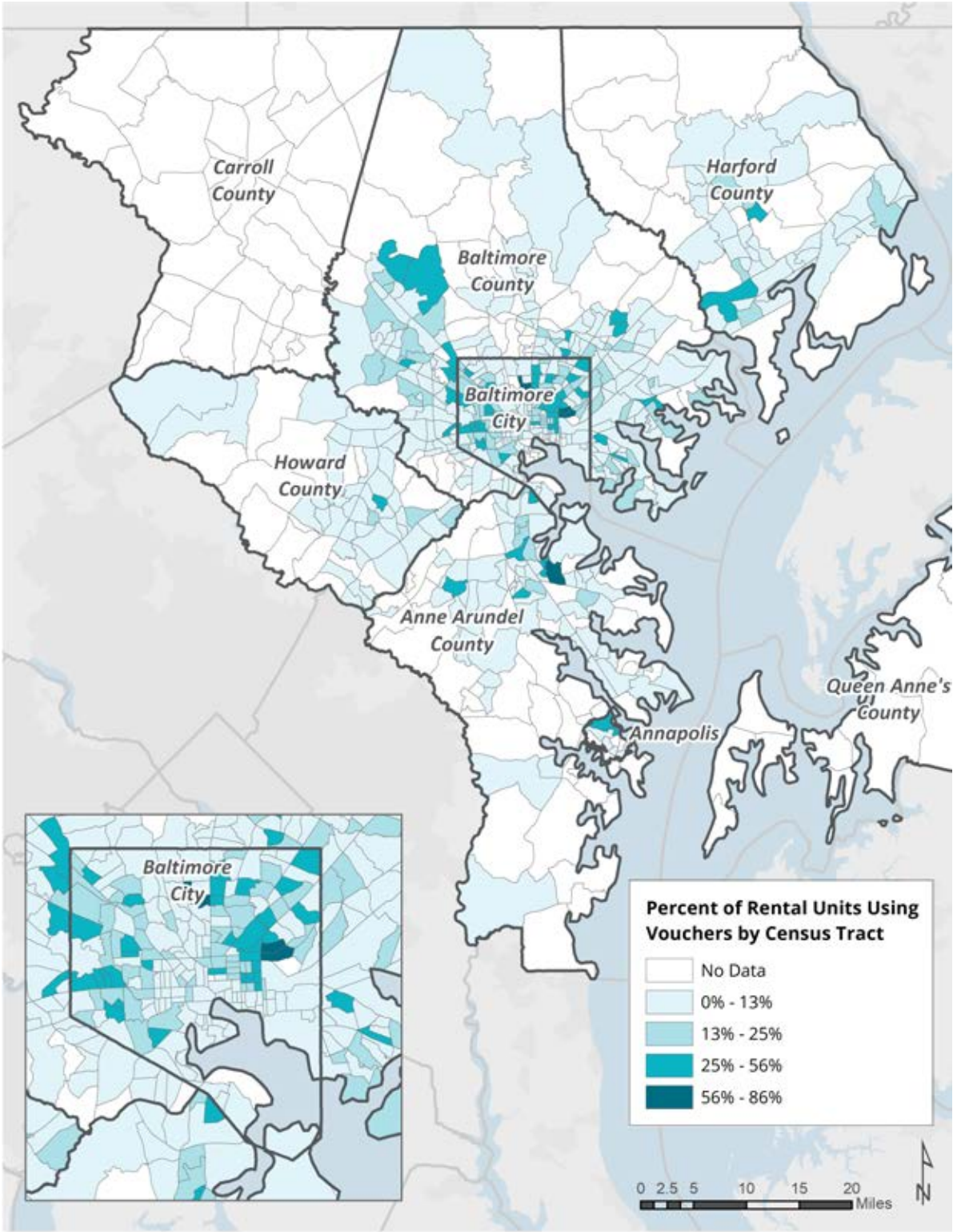
**Figure VI-39.**  
**Voucher Holders by Opportunity, 2023**

	Anne Arundel County	Baltimore County	City of Baltimore	Harford County	Howard County	ALL
<b>Percent voucher holders living in...</b>						
Low opportunity tracts	61%	64%	95%	44%	2%	75%
Medium opportunity tracts	32%	29%	3%	32%	39%	17%
High opportunity tracts	7%	7%	2%	24%	59%	8%
Total tracts	100%	100%	100%	100%	100%	100%
<b>Percent voucher holders who are Non-Hispanic White living in...</b>						
Low opportunity tracts	76%	62%	90%	35%	3%	62%
Medium opportunity tracts	16%	27%	5%	30%	42%	22%
High opportunity tracts	8%	11%	5%	35%	55%	16%
Total tracts	100%	100%	100%	100%	100%	100%
<b>Percent voucher holders who are African American living in...</b>						
Low opportunity tracts	57%	64%	95%	51%	2%	77%
Medium opportunity tracts	36%	29%	3%	32%	39%	16%
High opportunity tracts	7%	7%	1%	17%	59%	7%
Total tracts	100%	100%	100%	100%	100%	100%
<b>Percent voucher holders with disabilities living in...</b>						
Low opportunity tracts	72%	67%	95%	43%	2%	80%
Medium opportunity tracts	22%	26%	3%	28%	39%	13%
High opportunity tracts	6%	7%	2%	30%	59%	7%
Total tracts	100%	100%	100%	100%	100%	100%
<b>Percent voucher holders with children living in...</b>						
Low opportunity tracts	57%	64%	95%	51%	2%	77%
Medium opportunity tracts	36%	29%	3%	32%	39%	16%
High opportunity tracts	7%	7%	1%	17%	59%	7%
Total tracts	100%	100%	100%	100%	100%	100%

Source: Root Policy Research.

The map below shows a regional view of voucher use compared to total rental units in each Census tract as of 2023. Renters utilizing vouchers continue to be concentrated in eastern and northeastern Baltimore City and northwest Baltimore County. Compared to 2018, voucher usage has increased in Anne Arundel and Harford County.

**Figure VI-40.**  
**Vouchers to Total Rental Units, 2023**



Source: HUD Picture of Subsidized Households.

**The Baltimore Regional Project-Based Voucher (PBV) Program.** One way that the public housing authorities participating in this analysis have been collaboratively affirmatively furthering fair housing has been through the Regional Project-Based Voucher (PBV) Program, established in 2016 together with BMC and the Baltimore Regional Housing Partnership (BRHP) with help from a \$550,000 HUD seed grant. Modeled on a then-existing program in Chicago, the program enables the PHAs to incentivize new development and deep affordability in high opportunity areas – safe communities served by quality neighborhood schools. Participating PHAs committed to project-based a number of their Housing Choice Vouchers (HCVs) and devote them to this regional program. Starting with a regional total of 100 vouchers, additional commitments have grown it to 193, as depicted in the figure below.

**Figure VI-41.**  
**Participating Housing Authority Voucher Commitments to Regional PBV Program**

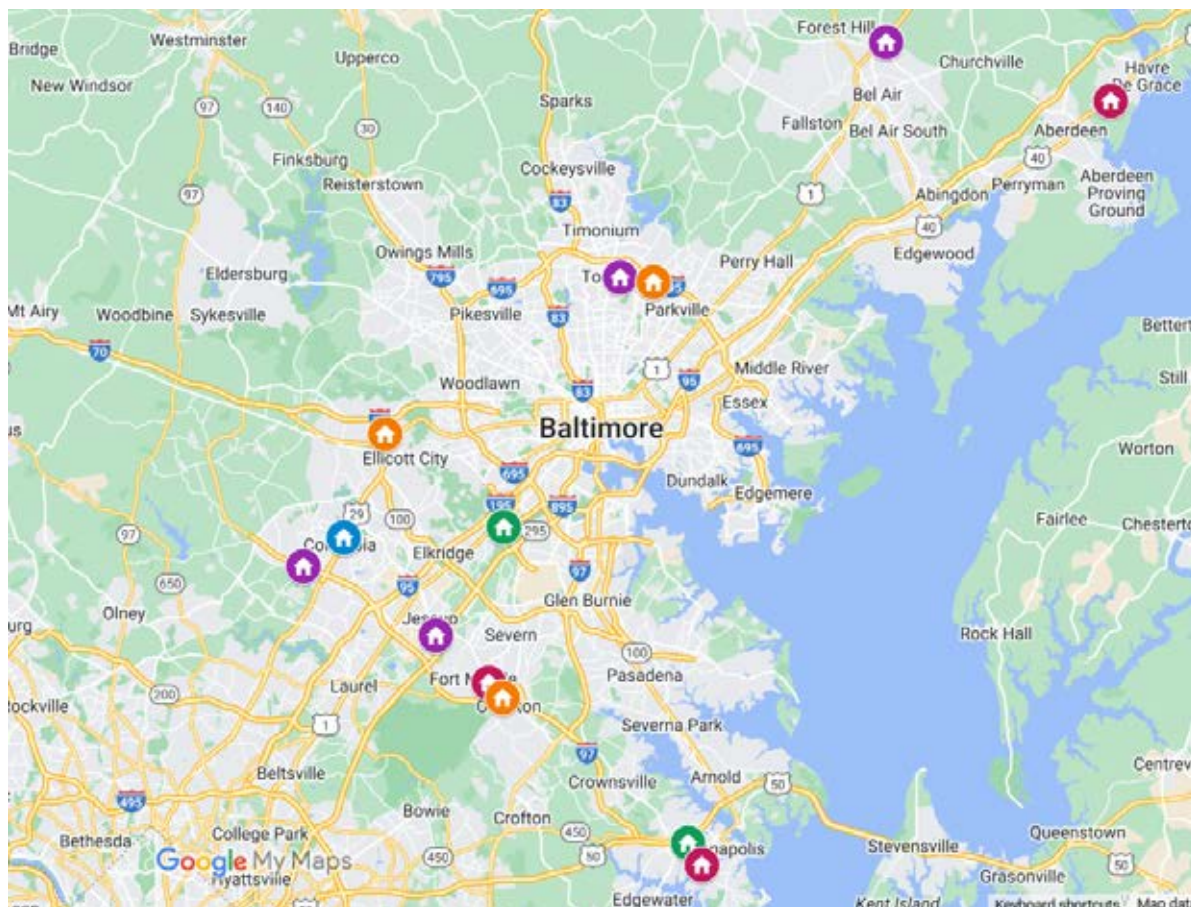
Jurisdiction/Housing Agency	Vouchers in Program
Baltimore County	59
Baltimore Regional Housing Partnership	28
Harford County	6
Housing Authority of Baltimore City	80
Housing Authority of City of Annapolis	3
Housing Commission of Anne Arundel Co.	12
Howard County Housing Commission	5
<b>TOTAL</b>	<b>193</b>

Source: BMC

PHAs contributed vouchers roughly in proportion to the size of their voucher program, with more than half of the PBVs coming from HABC and BRHP, both of which draw their participants from Baltimore City. Since 2016, the collaboration has issued nine regional requests for proposals, committing 150 of these vouchers to 13 developments, all in opportunity areas in five jurisdictions, as shown in the figure below.



**Figure VI-42.**  
**Developments Receiving Regional Project-Based Vouchers since 2016**



Source: BMC

More information on this program and a full list of awardees can be seen at <http://bit.ly/BaltRegionalPBV>.

In addition to securing 150 units of deeply affordable homes open to families in safe communities served by quality neighborhood public schools, these awards have helped finance more than 1000 units of more broadly affordable housing in these same opportunity areas around the Baltimore metropolitan area. That is because these awards are generally part of larger developments financed by Low Income Housing Tax Credits (LIHTC). In the competition for particularly valuable 9% LIHTC, these PBVs can earn a developer applicant crucial points for providing homes for extremely low-income families and for leveraging other funds for the development. With a commitment of PBVs, a developer can often secure larger loans for their project.

So far the Baltimore Regional Housing Partnership, which administers the PBVs for the collaboration, has leased 44 low-income families from participating housing authority waiting lists in the first of these new homes to be constructed. Even though none of the



developments so far are located in Baltimore City, 30 Baltimore City families are benefiting from it – 20 from HABC’s waiting list and 10 from BRHP’s. As a result, for families who might currently live in a dangerous community served by a high poverty school and want a very different environment for their children, this program can be a unique opportunity. In creating the program in 2016, the participants realized that many HABC and BRHP vouchers would likely be used in suburban developments. They understood the value of that for the families who would lease those homes, but they wanted to make sure those families came from a jurisdiction in proportion to that jurisdiction’s contribution of vouchers to the program. As a result, this effort has become a true housing mobility program, helping families find homes in the types of communities that historic redlining and its aftermath often put out of reach for them.

While the 2015 HUD seed grant for this new program lasted longer than the originally anticipated three years, it is now expended. Since late 2020, the participating housing authorities have been contributing to fund the central coordination provided by BMC’s housing policy coordinator. As of 2024, however, the mobility counseling funds in the seed grant are also expended, and the participants have not found a solution for sustaining that important component of this program. Given that families may be moving to a very different community than they may be used to, this counseling helps families address credit and tenancy problems, understand their rights and responsibilities with their new landlord, and access resources in their new community. A key action item in this analysis is identifying new funding for this important function.

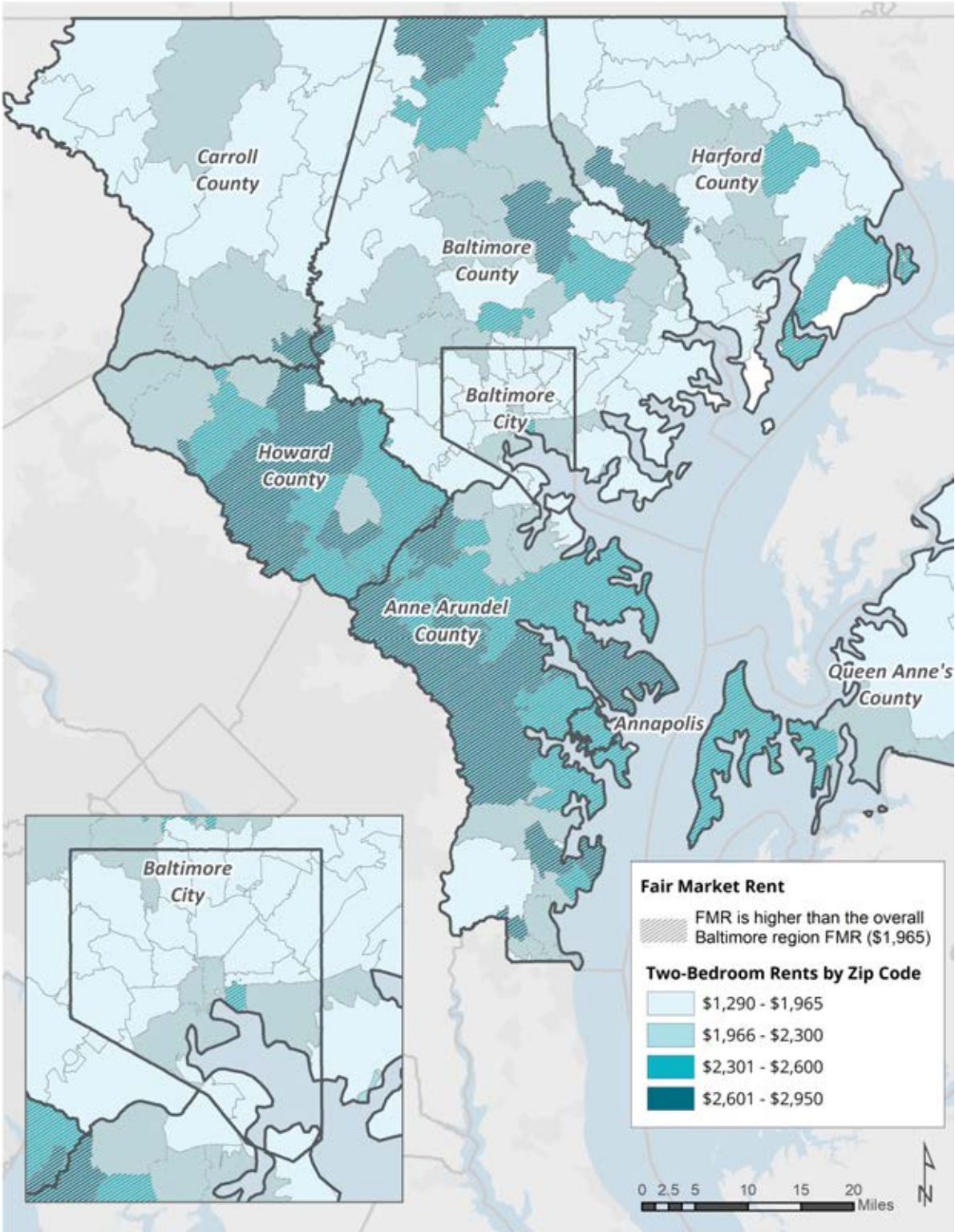
**The impact of Fair Market Rents (FMRs) on voucher usage.** Annually, HUD establishes “Fair Market Rents,” or FMRs, for metropolitan statistical areas. These determine how much HUD, through public housing authorities, will compensate households with Housing Choice, or Section 8, Vouchers.

As the analysis in the Disproportionate Need section on the location of rental units by AMI range revealed, units affordable to households with AMIs in the 0-30% range are concentrated in Baltimore City and in low opportunity areas. There are a few pockets of units in moderate opportunity areas in West Baltimore County. This is also true of units affordable to up to 50% AMI, although at that price point, there are slightly more units affordable in moderate opportunity areas in Baltimore County and some parts of Harford and Howard Counties.

In 2016 HUD developed zip code area FMRs, which take into account variance in rental costs within a zip code (not region) when determining the voucher subsidy. These “small area” FMRs are required in some metropolitan areas and optional in others, including the Baltimore area. The map on the following page compares the “small area,” or zip code, FMRs with the regional FMR of \$1,965 for a two-bedroom home. The crosshatch indicates neighborhoods where the small area FMR is higher than the regional FMR.

The map demonstrates the importance of adopting small area FMRs in Howard and Anne Arundel Counties (discussed below) where FMR are higher in many parts of county than the regionwide FMR. Without small area FMRs, voucher holders would have trouble accessing these areas.

Figure VI-43.  
Small Area FMRs, 2025

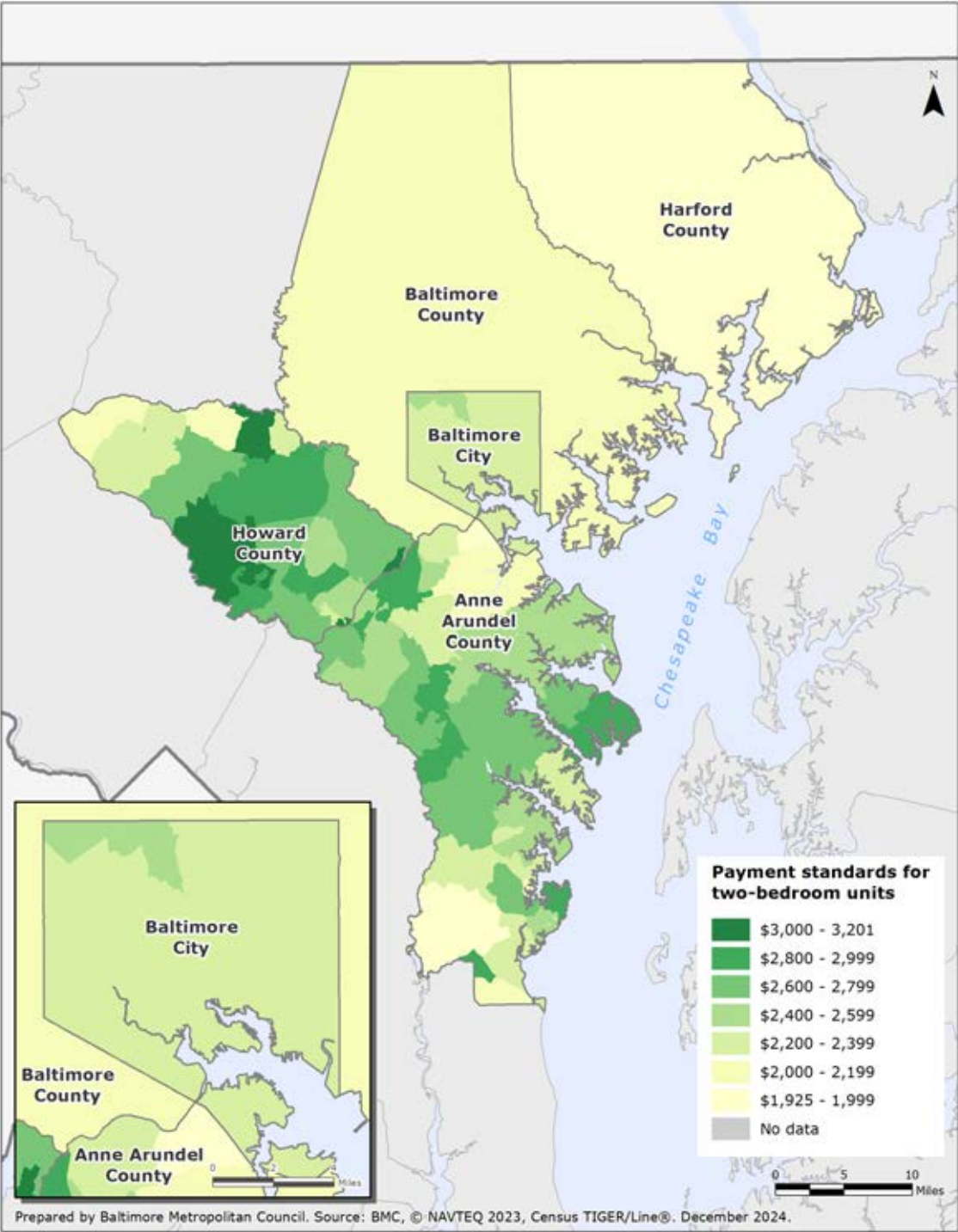


Note: The crosshatch indicates a ZIP code where the zip code FMR is higher than metro wide FMR.

Source: [www.huduser.org](http://www.huduser.org); Fair Market Rent database.

HUD allows housing authorities to use small-area FMRs or to request from HUD “exception payment standards” both higher and lower than the metropolitan-wide FMR. In general, PHAs have authority themselves to set payment standards between 90% and 110% of FMR, with HUD regulations making approval of requests progressively more difficult the further above and below the FMR those requests are. The Housing Commission of Anne Arundel County and the Howard County Housing Commission now use HUD’s zip-code-based small-area FMRs, and the Housing Authority of Baltimore City uses its Moving to Work (MTW) status to set payment standards up to 120% of the region’s 50<sup>th</sup>-percentile FMRs.

**Figure VI-44.**  
**December 2024 Baltimore-area PHA Payment Standards for Two-Bedroom Units**



Source: BMC.

## SECTION VII.

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### DISABILITY AND ACCESS



## SECTION VII.

# Disability and Access

This section discusses access to housing and economic opportunity for people with disabilities. It addresses:

- *How persons with disabilities are geographically dispersed or concentrated in the jurisdictions and region, including their representation in racially and ethnically concentrated areas and poverty concentrated areas;*
- *The extent to which residents with disabilities can sufficiently access affordable, accessible housing in a range of unit sizes;*
- *Barriers faced in accessing housing and community amenities including schools, parks, employment, and transportation.*

### History of Disability Protections in Fair Housing

For much of our nation's history, persons with disabilities were institutionalized and/or expected to be cared for by family members. It was not until very recently that community integration and independent living for persons with disabilities became part of housing policy and planning. The lack of housing policy to recognize the needs of persons with disabilities has resulted in extremely limited housing choices.

The original Fair Housing Act did not offer protections for persons with disabilities. Disability protections were added 20 years after the original (1968) Fair Housing Act was passed, in 1988.

The 1988 Fair Housing Act Amendment:

- Prohibits housing providers from discriminating against people with disabilities applying for or residing in housing because of their disability or the disability of anyone living with them;
- Prohibits housing providers from treating applicants or residents with disabilities less favorably than others because of their disability; and
- Makes it unlawful for any person to refuse to make "reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford...equal opportunity to use and enjoy a dwelling."<sup>1</sup>

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<sup>1</sup> <https://www.hud.gov/sites/documents/huddojstatement.pdf>

The 1988 Amendment has been interpreted to apply to a broad set of actors. Courts have applied the Act to individuals, corporations, homeowners or condominium associations, lenders, property managers, and real estate agents.<sup>2</sup>

The Act uses the term “handicap” rather than disability; however, the terms have the same legal meaning. The Act also uses the term “physical and mental impairment” to describe handicap, which has been interpreted to include chronic diseases and conditions including HIV/AIDS, and alcoholism and substance abuse addiction (when in recovery but not actively using).

In addition to the Federal Fair Housing Act, the evolution of major federal legislation that has expanded protections for persons with disabilities includes:

- **Rehabilitation Act of 1973** (Section 504)—requires equal opportunity for employment within the federal government and federally funded programs, prohibiting discrimination on the basis of either physical or mental disability. Also mandates equal access to public services (including public housing and public transportation) and allocated money to vocational training.
- **Education for All Handicapped Children Act of 1975** guarantees equal access to public education for children with disabilities. Mandates full inclusion of children with disabilities into mainstream education classes unless a satisfactory level of education cannot be achieved.
- **Fair Housing Amendment Design and Construction requirements:** As part of the 1988 amendment, multifamily dwelling units built after 1991 must meet accessible design and construction requirements. These seven basic design and construction requirements cover building entrances; public and common use areas; door width; accessible routes within units; access to switches and outlets and temperature control within units; reinforced walls for grab bar installation; and usable kitchens and bathrooms.<sup>3</sup>
- **Americans with Disabilities Act (ADA) of 1990** covers employment rights (private and public sector), state and local government services, public accommodations, and telecommunications for the deaf and hard of hearing.

The fair housing challenges that people with disabilities encounter are complex, and many questions about fair housing protections and rights have been resolved in the courts. The most common misunderstandings of rights are in the areas of reasonable accommodations and service and companion animals.

- Reasonable modifications are physical changes and are different from reasonable accommodations, which are “rules, policies, practices or services.” Modifications and accommodations must be made when such accommodations may be necessary to

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<sup>2</sup> Ibid.

<sup>3</sup> [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/accessibility\\_first\\_requirements](https://www.hud.gov/program_offices/fair_housing_equal_opp/accessibility_first_requirements)

afford such person “full enjoyment of the premises”—the definition of which can be subjective.

- Under the Fair Housing Act, owners of private properties are not required to make or pay for modifications, but are required to allow them.
- There are differences in the ADA and Fair Housing Act in how animals are defined. Under ADA, a service animal is defined as a dog that has been trained to do work or perform tasks for an individual with a disability. The Fair Housing Act has broader protections through the reasonable accommodations language and includes companion and emotional support animals.

## Barriers to Access

The past challenges for persons with disabilities in the region have centered on the lack of affordable, accessible housing options in a variety of locations, as well as shortcomings in the public sector and private market in responding to the needs of persons with disabilities. As discussed in this section, the environment has improved in many ways—but significant barriers remain to enable residents with disabilities to achieve equitable access to fair housing choice and community amenities.

A 2002 lawsuit—brought by what is now Disability Rights Maryland against the Housing Authority of the City of Baltimore (HABC) and the City of Baltimore—highlights the challenges experienced by persons with disabilities in obtaining publicly subsidized housing. This lawsuit alleged that HABC favored seniors over non-elderly persons with disabilities (NEDs) in its high-rise buildings based on differences in needs exhibited in wait lists for such housing. The lawsuit also claimed that HABC was not adequately responding to reasonable accommodation and modification requests, and that a low number of HABC’s units met Section 504 Federal Accessibility Standards. The complaint resulted in a consent decree requiring:<sup>4</sup>

- A notification to persons with disabilities who are non-elderly about the existence of and ability to be housed in the high-rise mixed population buildings;
- Creating remedial housing opportunities for NEDs through preferences for NEDs in family developments; setting aside 850 tenant-based vouchers (all have been leased); creating 500 project-based units for NEDs (all have been created); and creating 100 long term affordable project based units for NEDs (units that are subsidized by project based vouchers but provide the NED applicants and occupants with public housing like rights, privileges and benefits) (all planned/under construction);
- Retrofitting or creating 755 (later increased to 756) UFAS units in a variety of sizes and locations (all have been created), as well as replacing UFAS units in RAD developments and redevelopment of public housing;

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<sup>4</sup> *Bailey et. al. v. the Housing Authority of the City of Baltimore (HABC), the Baltimore City Department of Housing and Community Development (HCD), the Mayor and City Council, and the Mayor of Baltimore City.*

- Retrofitting 75 near-UFAS units (all created);
- Making the common areas and the routes between the accessible units and the common areas accessible;
- Following the reasonable accommodation policy (attached to the Consent Decree), conducting training on 504 and Fair Housing Act requirements, conducting training on the reasonable accommodation policy and procedures, and designating an existing HABC staff member to be the Compliance Coordinator; and
- Creating an enhanced leasing assistance program to help NEDs successfully lease a unit with one of the 850 tenant based vouchers or in one of the 500 project based voucher NED units.

A companion Settlement Agreement with HCD and the Mayor and City Council of Baltimore required:

- A set aside of 11.5 percent of HOME funds to incentivize the development of new housing opportunities required by the Consent Decree; and
- A set aside of funds for modification of units subsidized by the 850 tenant based vouchers and remaining funds for accessibility modifications for other voucher holders.

HABC continues to implement its requirements pursuant to the Bailey Consent Decree, Supplemental Consent Decree, and Notice of Plan to Continue Implementation of the Terms of the Bailey Consent Decree and Supplemental Consent Decree.

On the private sector side, barriers exist in the gap between what an accessible unit costs and what a person with a disability can typically afford. Most multifamily developments are required by the Fair Housing Act amendments of 1988 to build units that are accessible (or modifiable to be accessible), yet these units often go unrented by people with disabilities, who often cannot afford them, and are then leased by people who don't need the features.

Maryland property owners can no longer discriminate against renters based on their source of income, including disability income and Section 8/Housing Choice vouchers. However, if rents are set too high (above the Fair Market Rent that is used to determine if a voucher holder can afford a unit), people with disabilities—who are often voucher holders—may not be able to afford accessible units.

Local zoning and land use regulations that cover the siting of group homes are discussed in this report's zoning and land use section. Jurisdictions typically impose special exception requirements on the siting of group homes and their codes can be unclear about the home size at which these requirements are imposed. Some jurisdictions' definitions of family also conflict with ideal group settings which would include at least 4 unrelated household members plus staff.

## Lived Experience: Housing Challenges from the Resident Survey, Focus Groups, and Interviews

**Residents participating in focus groups.** Two focus groups with a total of 16 people and four one-on-one conversations were held with residents with disabilities who live throughout the region. Four staff members who work with people with disabilities participated in the groups.

The one-on-one conversations and one focus group were held virtually. One focus group was held with residents with intellectual and development disabilities (IDD) who reside in Harford County. The primary themes from these discussions are summarized in this section.

The demographics represented in the focus groups and conversations included:

- An equal split among genders;
- Fifteen African American residents;
- One White resident;
- Two Hispanic residents.

The living arrangements of the focus group attendees included:

- Ten individuals lived with family members—parents and nieces and siblings.
- Five lived in group home settings run by both small and large providers.
- Three lived with roommates.
- Two lived with their partners; one had two children.

**Group home environments.** Most of the residents were happy with their home environments, although those settings were not without challenges. Many had formed close bonds with their roommates.

**Housing and community choice barriers.** Although this has improved over time, some providers give residents limited options for choosing roommates and will reassign them to different homes to accommodate providers' needs over resident needs (for example, moving a less aggressive roommate to a different setting rather than properly accommodating the needs of the aggressive resident). Residents can be coerced into moving through incentives such as new room decor. It is challenging to determine if residents truly want to move—or if their providers or family members are pushing them into those decisions.

Challenges in maintaining staffing ratios due to program budgets limit residents' opportunities to fully enjoy their communities. In many cases, there is one staff member to four residents (1:4). If one resident needs to get medical care and a "floater" staff is unavailable, then all residents must travel together to the medical appointment. This can

limit the opportunities of the other residents. Gender ratios also complicate care, and residents may need to be moved for the day if only opposite gender staff are available.

Residents who form committed relationships are sometimes prevented from living together because group homes cannot accommodate them. They may be limited in how often they can see each other due to transportation and staffing challenges.

Residents would like more opportunities to go on outings in their counties, including sports events (Orioles, University of Maryland sports), movies, and seeing friends outside of their homes more frequently. These events are sometimes too expensive, or need to be scheduled so far in advance that they are hard to make happen within group home settings.

A solution to the barriers presented above would be better funded group home environments, to allow lower staffing ratios so residents could have more flexibility in their preferences and more actively enjoy community amenities.

*“Our dream would be two staff members for each group home with 4 residents.”*

In the virtual focus group and one-on-one conversations, participants expressed need for more wheelchair-accessible parks and improved sidewalk designs to enhance mobility. One participant said they would like to hang out with friends in more community spaces and utilize accessible equipment in parks but have struggled to find such a place in their neighborhood in Baltimore. They felt that improved accessibility within common spaces would lessen the stigma of their disability. Others emphasized the importance of ramps, wider sidewalks, and accessible public transportation like buses and trains. Construction zones often disrupted mobility, and they desired alternative, accessible routes.

Cost was the most common barrier to housing for virtual participants. High security deposits and application fees posed financial barriers, with some turning to crowdfunding for assistance. Cost also limited housing options that met both accessibility and space needs. Some had to double up in bedrooms with family members to achieve affordability and accessibility. Physically moving was also identified as particularly challenging due to limited mobility and the need for financial resources to cover moving costs. One participant suggested a city program to assist with moving for people with disabilities when they need to move.

Several participants had applied for a housing voucher to ease their cost of housing, but long waitlists with little communication created additional frustration. One participant was unable to use their housing voucher after several landlords told him they did not accept them.

**Employment barriers.** Some day programs provide opportunities for residents to volunteer in their communities to build job skills. Many residents make strong, committed employees because they take their jobs very seriously, are good at following directions, and are very detail oriented. However, as employers have made jobs more complicated or “layered”—for example, requiring that people working in a deli must be able to work a



meat slicer, or people working in a retail setting must be able to operate a cash register—residents have lost their opportunities for employment. Library jobs are in high demand by residents, but budget cuts and job requirements (beyond shelving books) have lowered those opportunities.

Solutions to create more employment opportunities include employers could be educated and incentivized to better embrace the unique skills that these residents offer in the workplace—and how to accommodate the challenges residents face (see transportation access below). Families could do better to welcome employment opportunities and allow their IDD family members to explore their potential, without irrational fears that they may lose their benefits (this would only occur if residents earned \$40,000 and more).

**Transportation** is also a challenge for maintaining employment. Public transportation is very limited in Harford County, and late buses can get residents fired. Group homes prioritize medical appointments over employment schedules. Mobility program buses are very limited and do not run on weekends. Group home program staff cannot always accommodate the job schedules of residents. Increased staffing would address this challenge.

Several participants in the virtual focus group and one-on-one interviews rely on partners or friends for transportation and preferred taking the train when they did use public transit. Taxis and ride-sharing services like Uber can be difficult to use. Some participants have had Uber drivers cancel their ride when they cannot help them into their car or fit their wheelchair to the trunk. "Access a Ride" and buses are also stressful to use. Some bus drivers have to help participants in wheelchairs get settled. One participant, who recently became a wheelchair user, avoided taking public transportation because of this.

**Discrimination.** Several virtual participants shared stories of discrimination related to their race, family, disability, and/or sexual orientation:

- *"I toured an apartment with my uncle that was big enough for both of us but the landlord told us we would not be welcome there and that the community did not like Black people. We did not report this incident. We just went on and continued to try and find somewhere else."*
- *"I asked my landlord to install a wheelchair ramp at the entrance and to widen doorways to accommodate wheelchair, but the landlord said it was too expensive to make accommodations. I ended up looking for another place to live."*
- *"Tried to get a tour of a rental unit and I was told 'I didn't fit the profile.'"*
- *"I tried to rent a place and the owner told me 'wasn't looking to rent to Blacks' and said that I would be an inconvenience to my flat mates because of my disability."*
- *"Landlord said they wanted to rent to smaller family."*

- *“My friends with Social Security Disability Income have difficulty finding landlords that accept their income.”*
- *“I looked at a place with lower counters and it was being rented by a pastor of a church. I toured with my partner and the pastor said he changed his mind and was no longer renting the house. I think my sexual identity was more of a barrier than skin color in that instance. We did not report – we were trying to find a place quickly. Now rent from a lesbian and feel very comfortable in current housing.”*
- *“I have been told that a unit was available to tour and then when I show up Black and disabled they say it’s no longer available. I found out later that the property was available. Did not report this because I did not want to be considered an ‘unfriendly tenant’.”*
- *“There was an open viewing and after the property manager saw us, she pretended to make a call and said it was no longer for sale. Two weeks later it was still vacant. Most of the neighborhood was white. I think it was mostly based on race. We had a discussion about the incident with a disability rights group I am a part of. We reported that to the city. We haven’t heard anything from the city.”*

Participants suggested that landlords and real estate agents join diverse disability rights groups to better understand their experience. Regarding potential fair housing trainings, one participant said, “We should encourage this collaboration. I could have found a house much sooner.”

**Displacement.** Discrimination resulted in displacement for some virtual participants. One participant left their apartment after facing racial discrimination, where they and their partner, the only people of color in the building, were falsely accused of being loud and disrespectful. Another participant requested ramps and grab bars and after several unsuccessful exchanges with their landlord, they were forced to move in search of more accessible housing. Rent increases forced several participants to move when they did not want to. One reported they have moved six times due to rent increases.

In Carroll County, a participant faced uncertainty when their landlord announced the demolition of their building, leading to months of legal uncertainty. They were finally given three months’ notice to leave but had difficulty covering deposits for a new place. The participant drained their savings and borrowed money from a family member to cover the associated moving fees.

**Financial stability.** Several virtual participants reported being behind on bills. Some expressed that food and housing assistance would help them catch up and save for emergencies. One participant faced difficulties applying for food stamps, only resolving the issue through a personal connection in human services. Car repairs depleted another's savings and left them without transportation for two weeks. They were reliant on friends and rideshares during this time.

Social networks played an important role during financial emergencies. A participant from the LGBTQ+ community relies on mutual aid groups, both giving and receiving help as needed. Others highlight the importance of financial support from close-knit family and community networks, particularly within the Black community.

**Residents participating in the survey.** More than 500 residents who live in a household that includes one or more members with a disability participated in a regional survey about housing choice and access to opportunity. Of those with disabilities, about half resided in Baltimore City, 20% in Baltimore County and 20% in Howard County, and 10% in Anne Arundel County.

Their responses are summarized here.

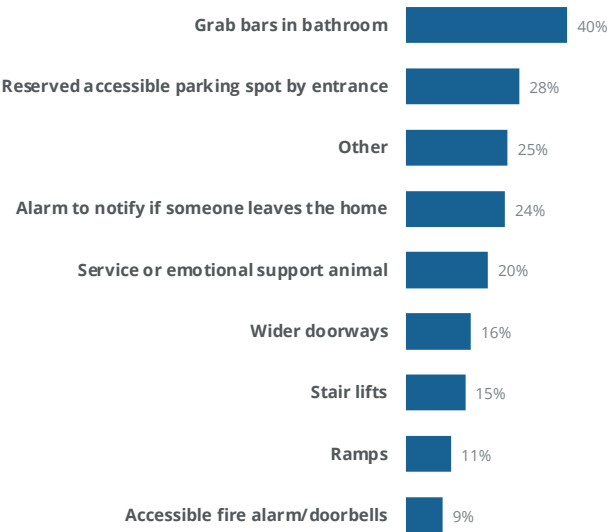
Affordability and availability of housing are the top reasons residents with disabilities chose their current housing, according to the survey: 36% said they chose their housing because of cost and 31% because they needed to find somewhere to live quickly. Other top reasons were safety (28%) and landlord accepting Section 8 (27%).

About 40% of respondents said their housing **did not meet their accessibility needs**, which was slightly lower from the 2020 study (44%). Consistent with the 2020 study, top accessibility needs remained as:

- Grab bars in bathrooms, and
- Reserved accessible parking spaces.

**Top Accessibility Needs in Housing**

Source:  
2024 Baltimore Regional Fair Housing Survey.



All survey respondents were asked to agree with potential challenges in their housing and neighborhoods. Worries about rent increases or eviction as a result of an accommodation request are significant, as are losing in-home health care. As shown below, residents with disabilities face a number of challenges, which are unfortunately, very common.

Significant Challenges Faced by Residents with Disabilities



Source: 2024 Baltimore Regional Fair Housing Survey..

## **Profile of Persons with Disabilities**

As shown in Figure VII-1, there are approximately 325,000 residents with disabilities in the Baltimore region—13% of all residents in the region. Of these, most live in Baltimore County (103,614 people) and Baltimore City (96,549 people). Baltimore City has the highest rate of disability at 17%; Howard County has the lowest at 9%. Many of the residents in the region with disabilities are older, and the most common disability is ambulatory difficulties. The second most common disabilities are cognitive and independent living.



**Figure VII-1.**  
**Prevalence of Disability, Baltimore Region and by Jurisdiction, 2022**

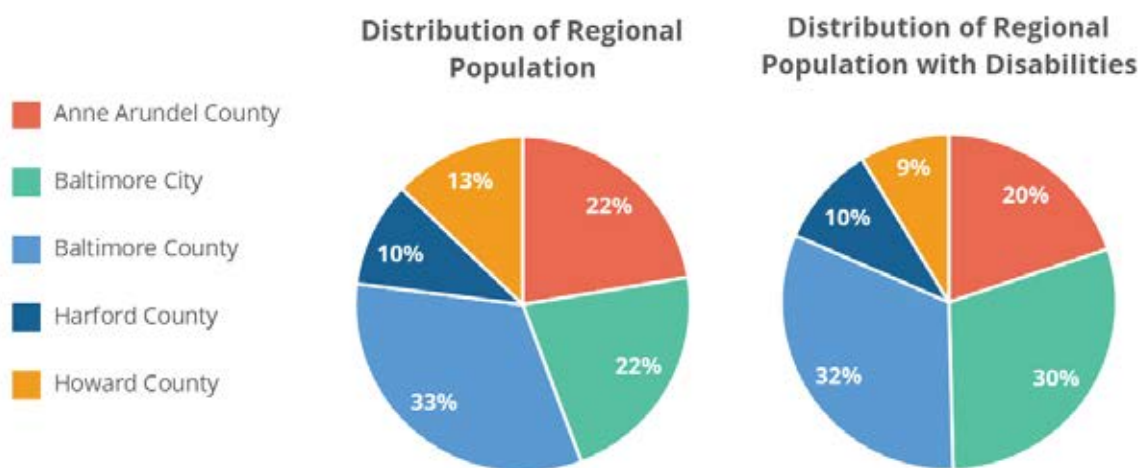
	Annapolis		Anne Arundel County		Baltimore City		Baltimore County		Harford County		Howard County		Region	
<b>#/% of Residents with a Disability</b>	<b>4,479</b>	<b>11%</b>	<b>64,457</b>	<b>11%</b>	<b>96,549</b>	<b>17%</b>	<b>103,614</b>	<b>12%</b>	<b>31,737</b>	<b>12%</b>	<b>28,201</b>	<b>9%</b>	<b>324,558</b>	<b>13%</b>
Under age 18	649	14%	6,873	11%	7,359	8%	6,427	6%	2,437	8%	3,520	12%	26,616	8%
Ages 18 to 64	2,011	45%	32,037	50%	53,450	55%	48,922	47%	15,305	48%	11,453	41%	161,167	50%
Ages 65+	1,819	41%	25,547	40%	35,740	37%	48,265	47%	13,995	44%	13,228	47%	136,775	42%
<b>Type of disability among Residents with a Disability</b>														
Vision difficulty	845	19%	9,151	14%	18,159	19%	18,987	18%	4,283	13%	3,308	12%	53,888	17%
Hearing difficulty	1,035	23%	16,572	26%	14,571	15%	23,784	23%	9,784	31%	6,929	25%	71,640	22%
Ambulatory difficulty	1,981	44%	28,398	44%	48,392	50%	51,719	50%	14,165	45%	9,819	35%	152,493	47%
Cognitive difficulty	2,120	47%	26,954	42%	40,996	42%	40,749	39%	12,645	40%	12,712	45%	134,056	41%
Self-care difficulty	522	12%	11,808	18%	17,005	18%	18,834	18%	6,068	19%	6,192	22%	59,907	18%
Independent living difficulty	1,474	33%	21,680	34%	32,505	34%	39,110	38%	10,332	33%	9,546	34%	113,173	35%

Note: Anne Arundel County data include the City of Annapolis. Annapolis data are 5-year ACS estimates. 1-year ACS estimates are presented for all others.

Source: 2022 ACS.

Figure VII-2 below compares the jurisdictional distribution of residents with disabilities with the jurisdictional distribution of the region's residents overall. Baltimore City is home to an outsized share of the region's population with disabilities: 22% of the region's population resides in Baltimore City, compared to 30% of the region's population with disabilities. People with disabilities are under-represented relative to total population in all other counties except for Harford County, where the share of the region's population equals the share of the region's population with disabilities.

**Figure VII-2.**  
**Jurisdictional Distributions of Regional Population and Regional Population with Disabilities, 2022**



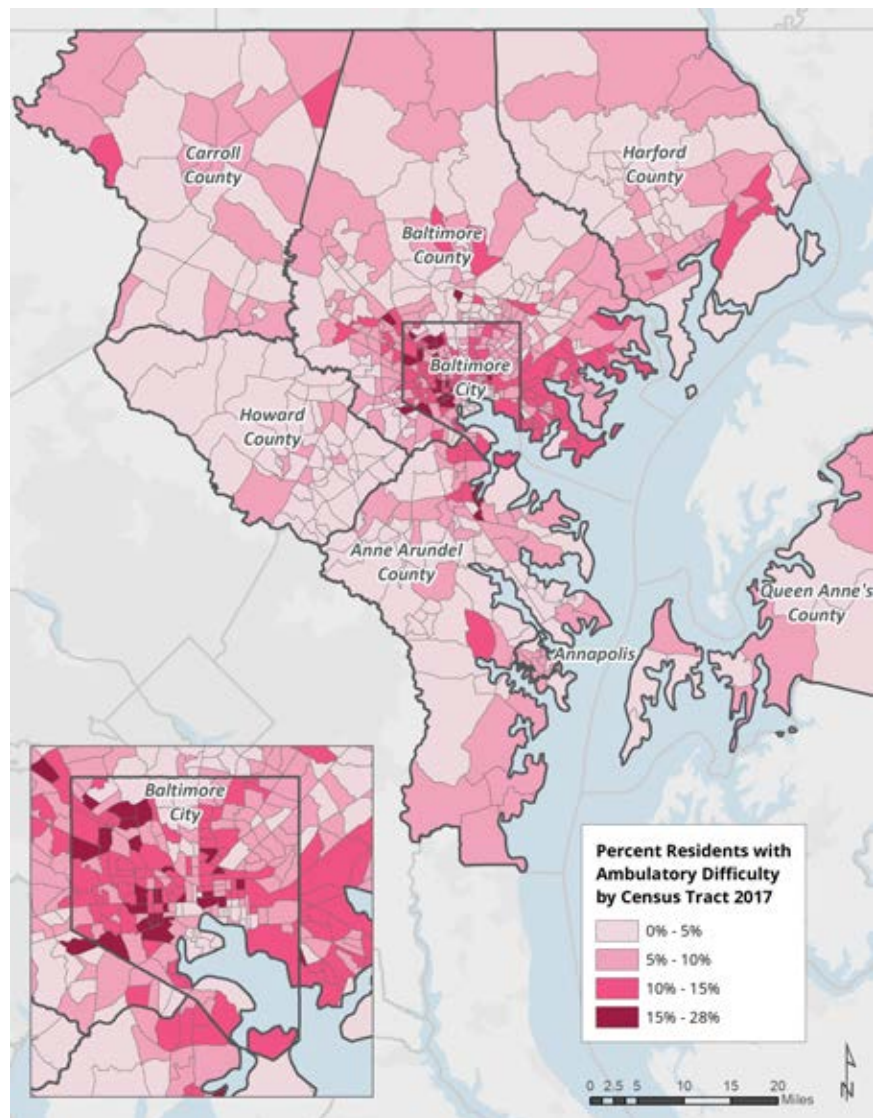
Source: 2022 1-year ACS.

## Segregation and Integration

Figures VII-3 through VII-8 show where residents with disabilities reside throughout the region.

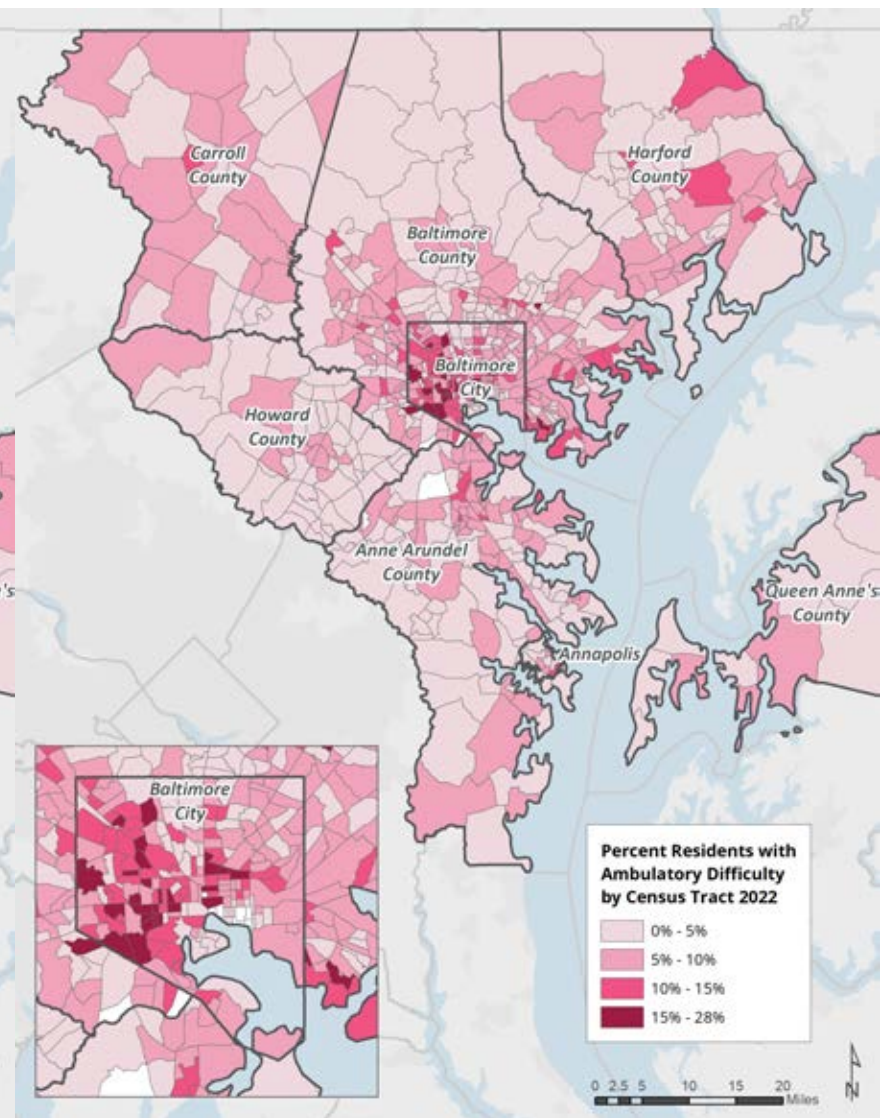
- Baltimore City continues to have the largest concentrations of residents with most types of disabilities. The exception is residents with hearing difficulties, who live throughout the region with few distinct patterns of concentrations.
- There are far fewer highly concentrated areas of residents with ambulatory difficulties in 2022 than in 2017. Baltimore City has fewer concentrations in both the West and East, while Baltimore County's diffusion of highly concentrated areas is mostly in the southeast, in the county's District 7 planning area. Patterns are similar for residents with independent living difficulties and self care difficulties.
- In 2022 as in 2017, residents with cognitive difficulties are most concentrated in the western, southwestern, and central portions of Baltimore City.
- Residents with vision difficulties have grown more pronounced in Western and Northwestern Baltimore and much of Baltimore and Anne Arundel Counties.

**Figure VII-3a.**  
Residents with Ambulatory Difficulty, 2017



Source: 2017 5-year ACS.

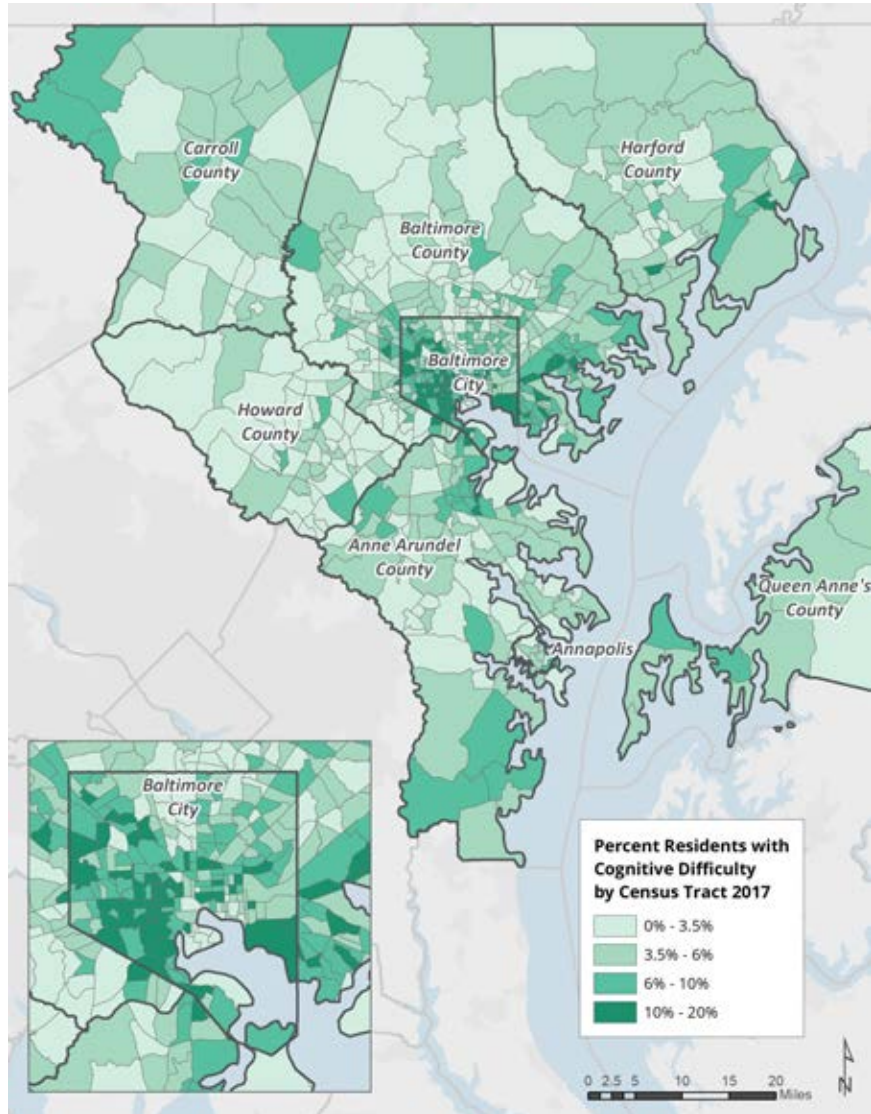
**Figure VII-3b.**  
Residents with Ambulatory Difficulty, 2022



Source: 2022 5-year ACS.

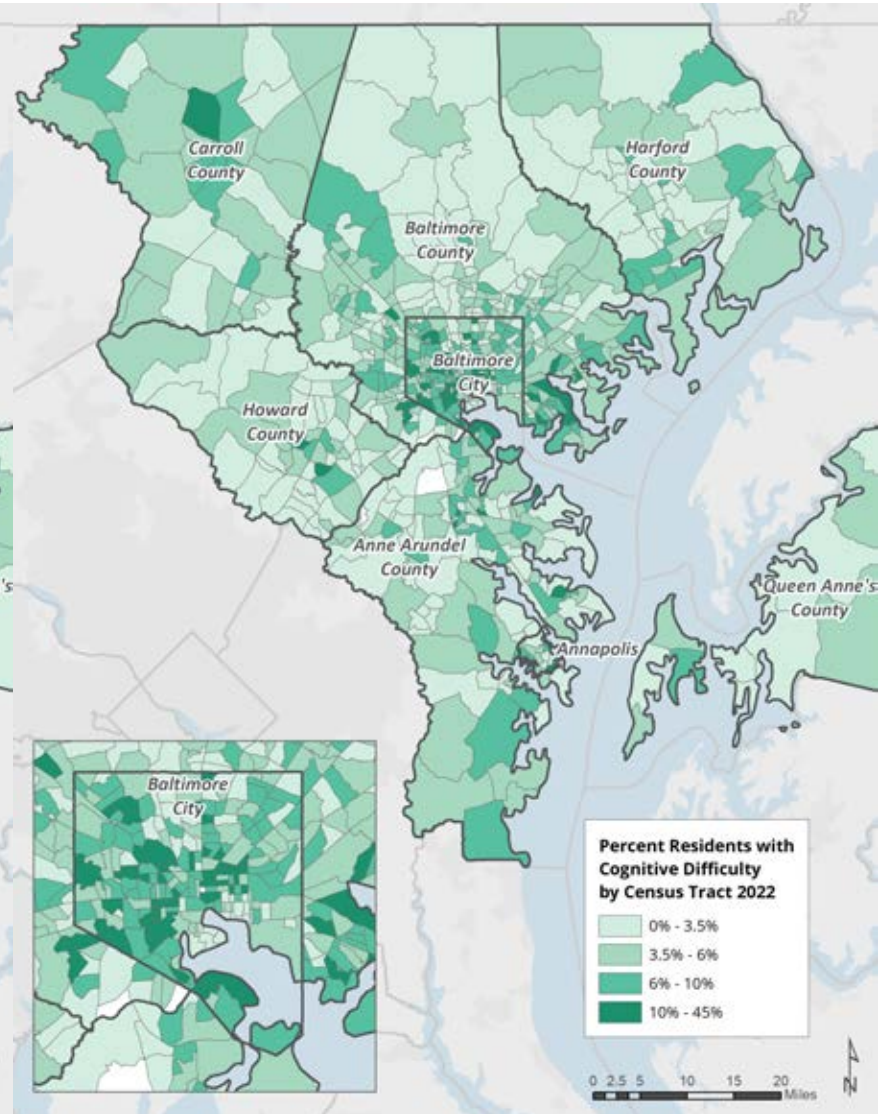


**Figure VII-4a.**  
Residents with Cognitive Difficulty, 2017



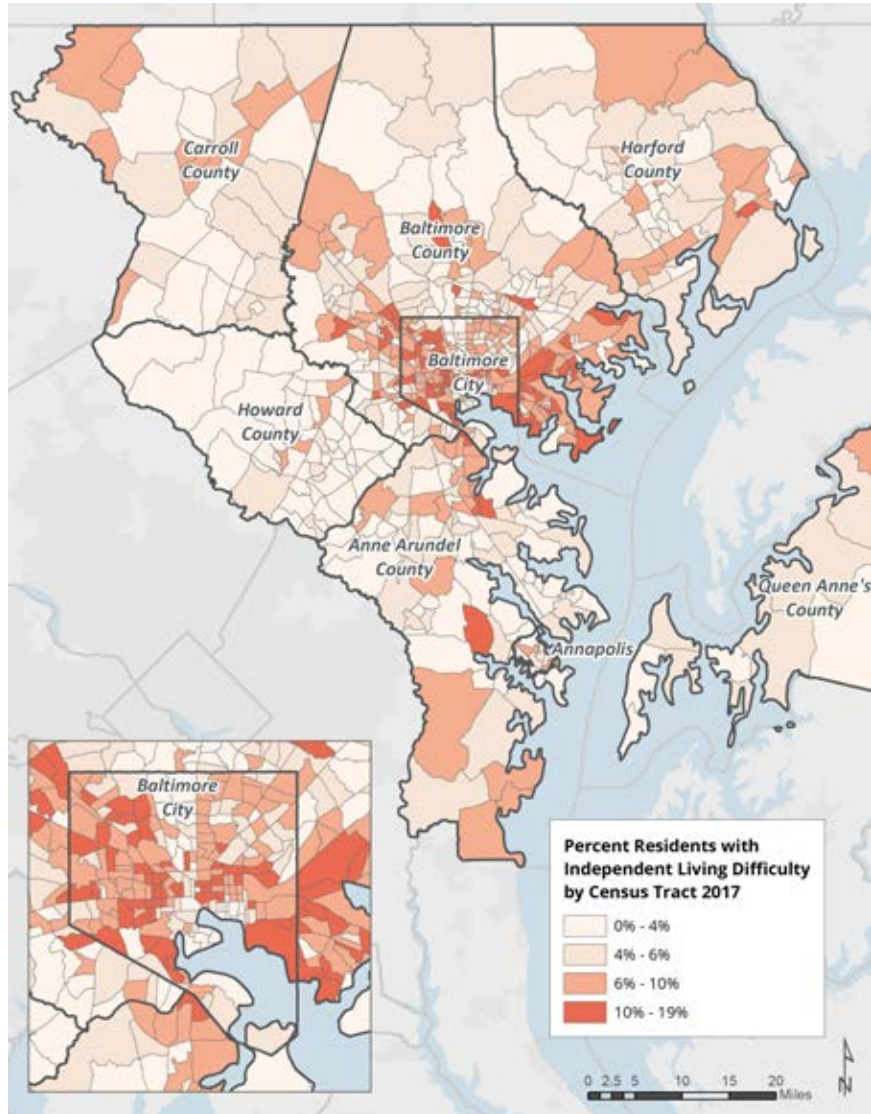
Source: 2017 5-year ACS.

**Figure VII-4b.**  
Residents with Cognitive Difficulty, 2022



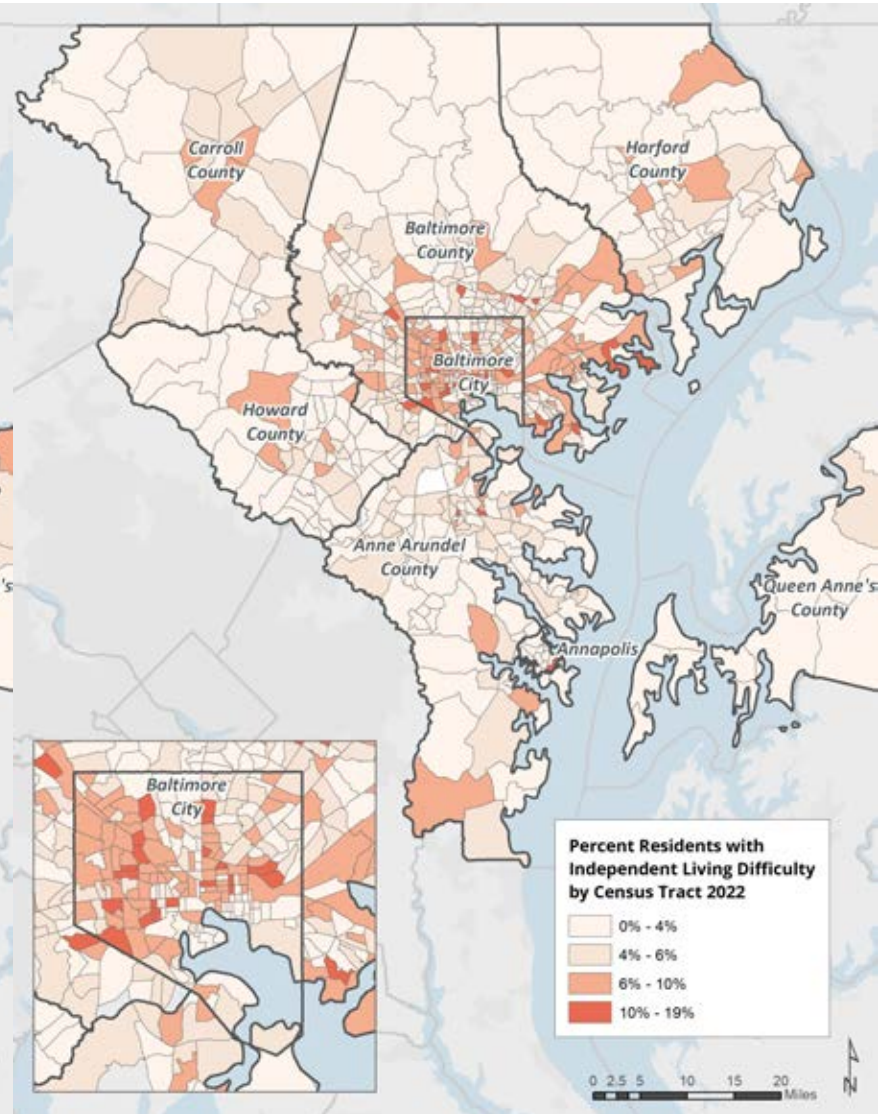
Source: 2022 5-year ACS.

**Figure VII-5a.**  
Residents with Independent Living Difficulty, 2017



Source: 2017 5-year ACS.

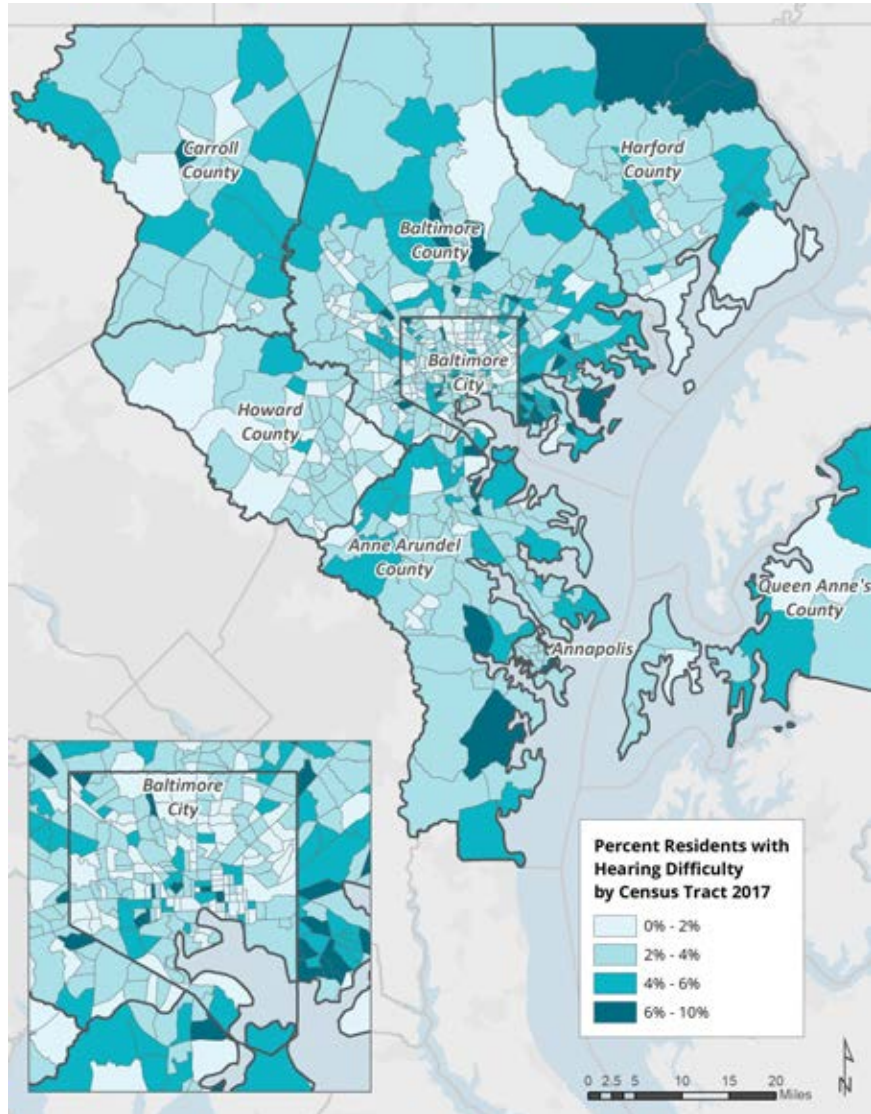
**Figure VII-5b.**  
Residents with Independent Living Difficulty, 2022



Source: 2022 5-year ACS.

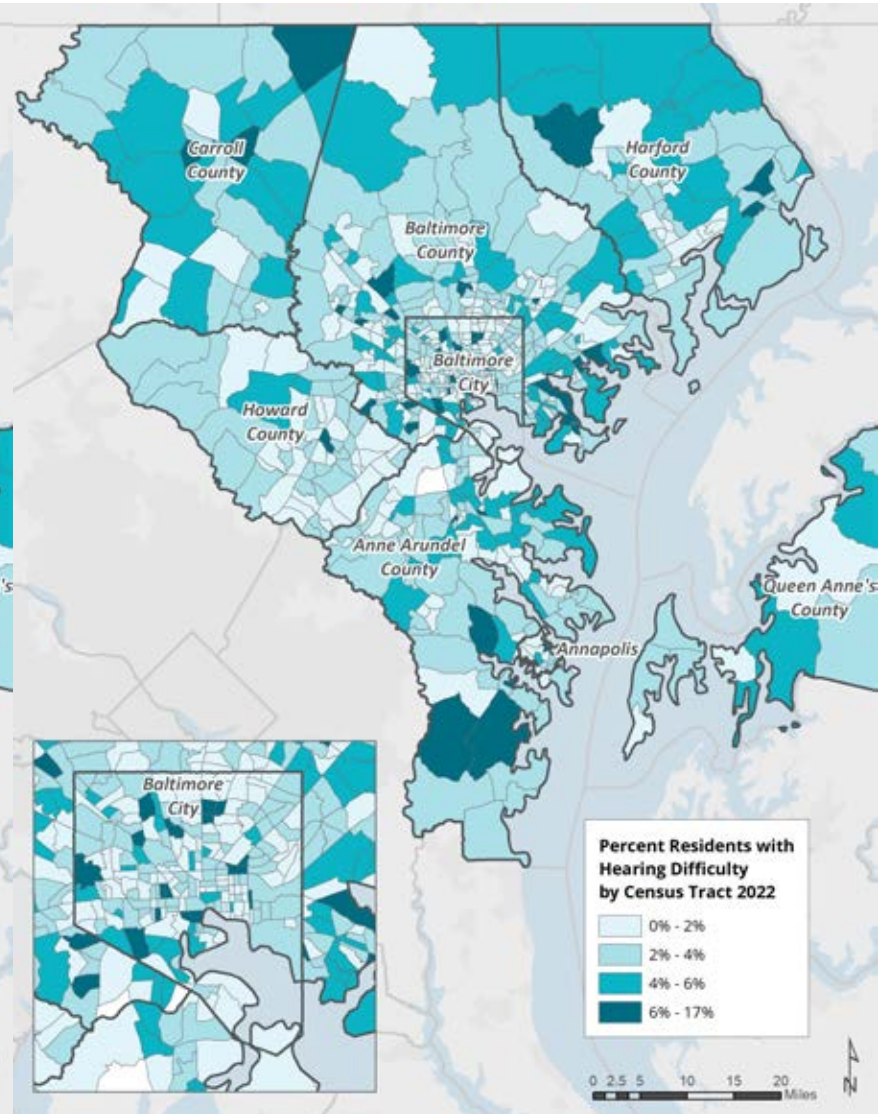


**Figure VII-6a.**  
Residents with Hearing Difficulty, 2017



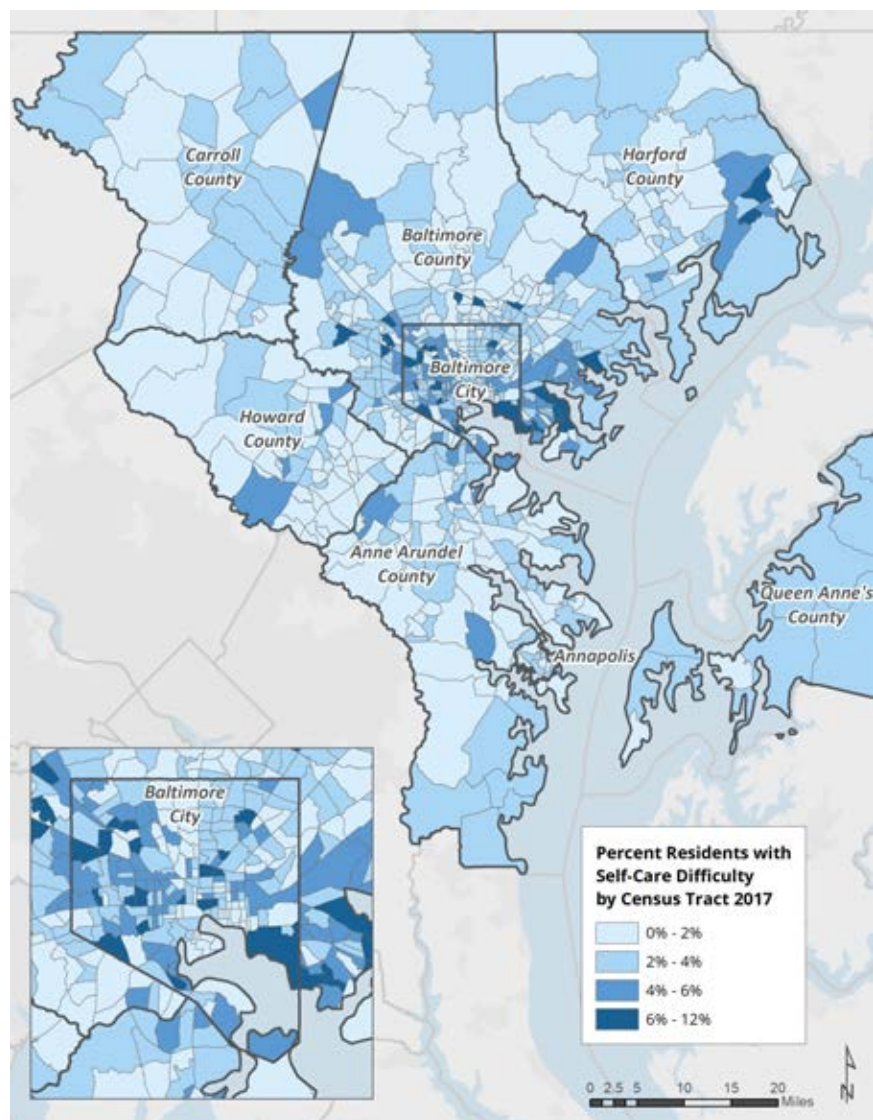
Source: 2017 5-year ACS.

**Figure VII-6b.**  
Residents with Hearing Difficulty, 2022



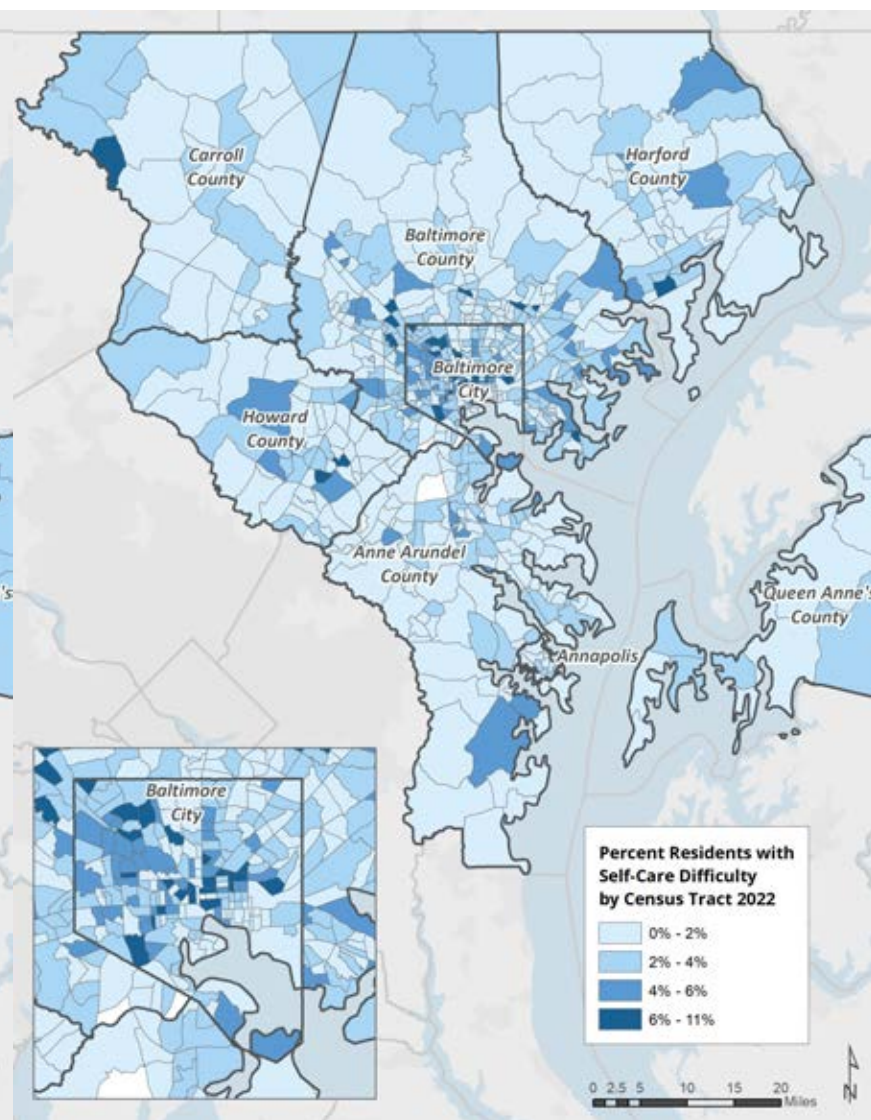
Source: 2022 5-year ACS.

**Figure VII-7a.**  
Residents with Self-Care Difficulty, 2017



Source: 2017 5-year ACS.

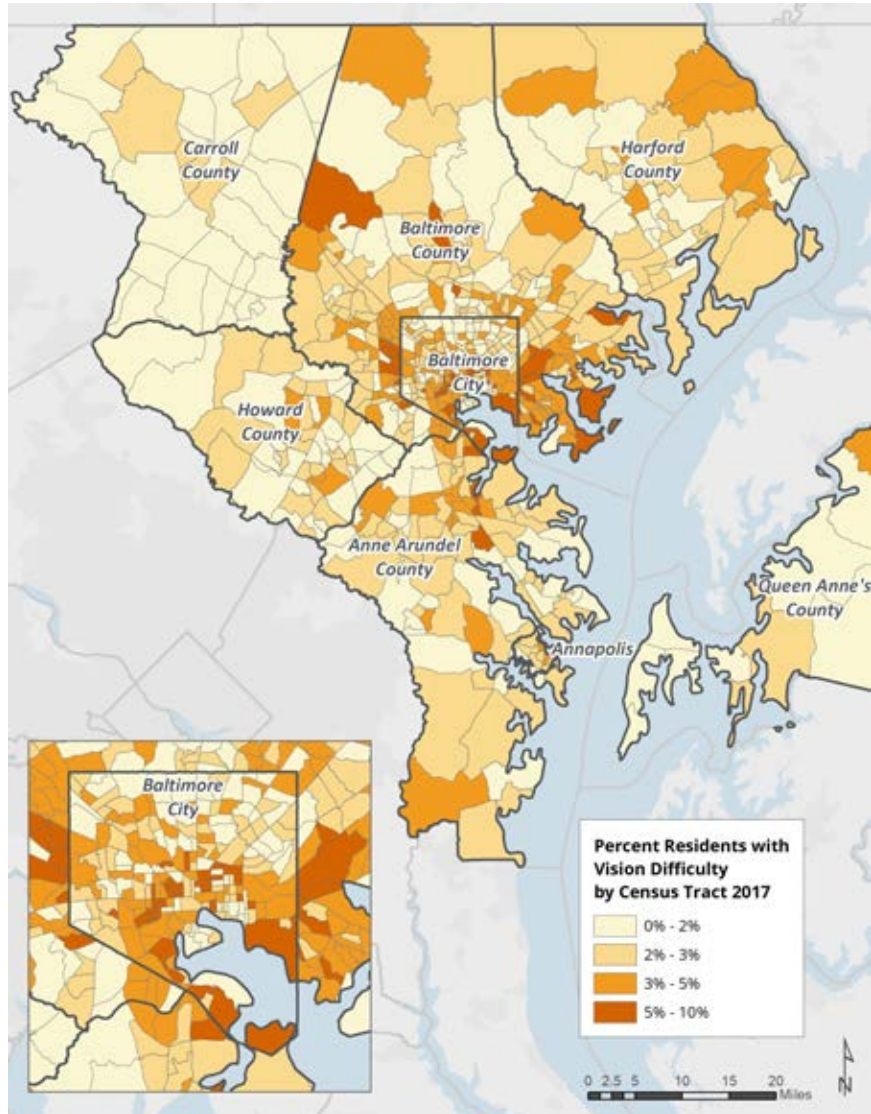
**Figure VII-7b.**  
Residents with Self-Care Difficulty, 2022



Source: 2022 5-year ACS.

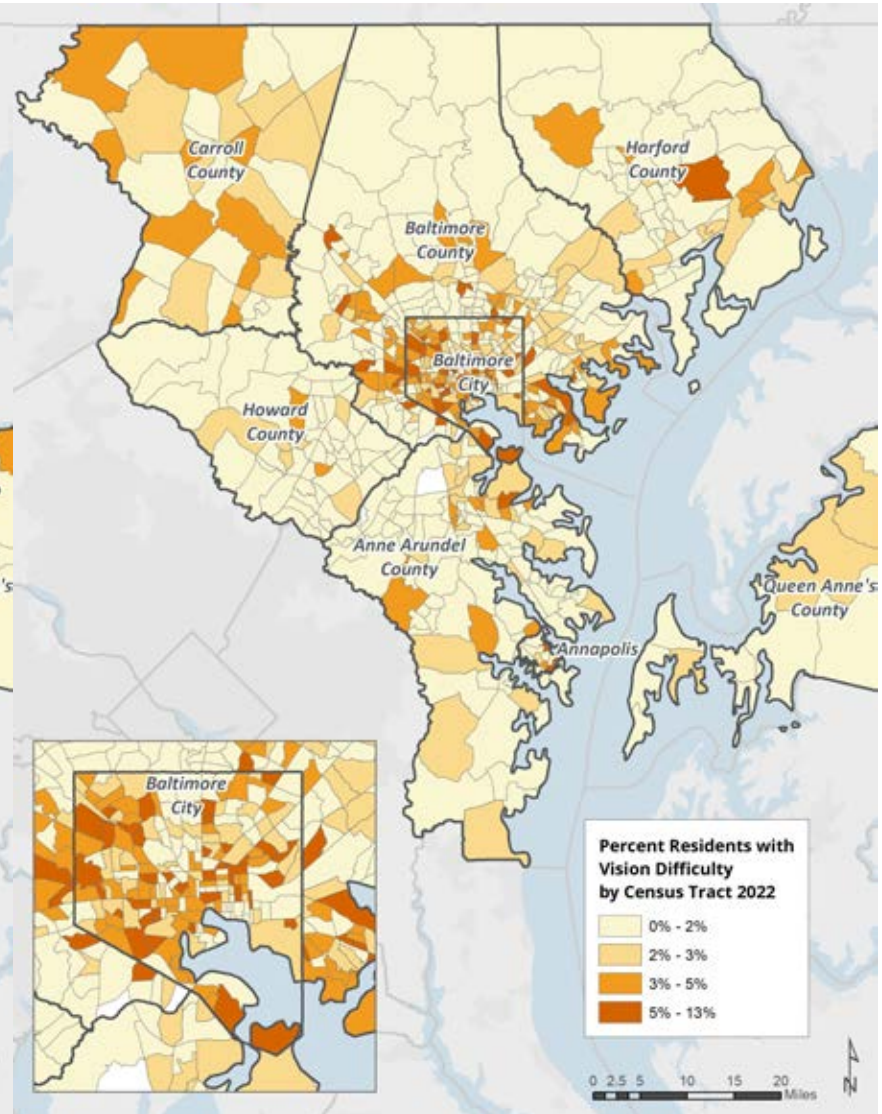


**Figure VII-8a.**  
Residents with Vision Difficulty, 2017



Source: 2017 5-year ACS.

**Figure VII-8b.**  
Residents with Vision Difficulty, 2022



Source: 2022 5-year ACS.

## Racially and ethnically concentrated areas of poverty (R/ECAPs).

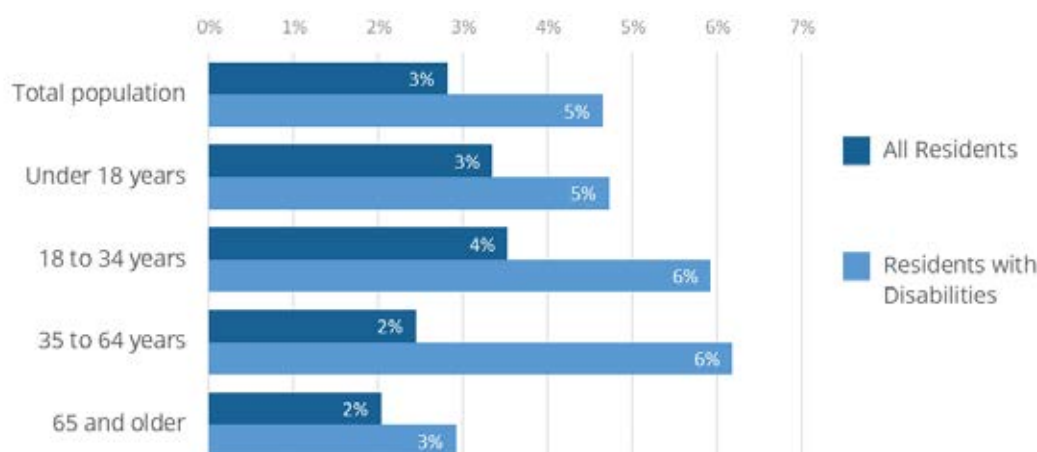
Residents with disabilities are more likely than others in their age cohort to live in neighborhoods characterized by racial/ethnic concentrations and high poverty (R/ECAPs). As discussed in Section III of this report, about 74,000 residents regionwide live in R/ECAPs, accounting for 3% of the total regional population. Among residents with disabilities, 15,090 are living in R/ECAPS, accounting for 5% of residents with disabilities.

This overrepresentation of people with disabilities in R/ECAPs holds true across age cohorts, though the difference is most pronounced for residents with disabilities between 18 and 64 years.

Figure IV-9 shows the proportion of residents by age living in R/ECAPs—both with and without a disability.

**Figure VII-9.**

**Percent of Age Cohort Living in R/ECAPs by Disability Status, Region, 2022**



Note: R/ECAPs are neighborhoods that have a poverty rate of 36.6 percent (three times the average census tract poverty rate of 12.2% for the region) and higher and a population consisting of more than 50 percent Non-White and Hispanic residents. R/ECAPs are mapped and discussed in detail in Section III.

Source: 2022 1-year and 5-year ACS estimates.

## Poverty, Income, Education, and Employment

For all age cohorts in all jurisdictions studied, individuals with disabilities are more likely to experience poverty than individuals with no disabilities. Differences are especially stark for individuals aged 18 to 64: in this cohort, individuals with disabilities are at least 2.5 times as likely as others in their age cohort to be in poverty.

Since 2017, poverty for residents with disabilities has decreased or remained stable for age cohorts in some geographic areas—possibly reflecting federal programs that provided income relief during the pandemic—and increased for age cohorts in other areas. Children with disabilities in Baltimore City have seen a 15 percentage point decrease in their poverty rate, while other children in Baltimore City have experienced a less dramatic reduction in poverty of 7 percentage points. Poverty rates additionally decreased substantially (-9

percentage points) for children in Harford County. Children with disabilities saw substantial increases in poverty in Howard County (+12 percentage points) and in Annapolis (+16 percentage points) since 2017.

Poverty has been more stable for individuals aged 18 or older, with the greatest change in this age cohort occurring for individuals with disabilities aged 18-64 in Annapolis. This group saw their poverty rate increase by 10 percentage points.

**Figure VII-10.**  
**Differences in Poverty, by Jurisdiction, 2022**

	Under Age 18 % in Poverty		Ages 18 to 64 % in Poverty		Age 65 and Older % in Poverty	
	With Disability	No Disability	With Disability	No Disability	With Disability	No Disability
Annapolis	21%	16%	35%	8%	7%	3%
Anne Arundel	17%	7%	15%	5%	6%	5%
Baltimore City	32%	25%	37%	14%	26%	15%
Baltimore County	26%	14%	20%	8%	14%	8%
Harford County	13%	9%	15%	5%	9%	8%
Howard County	22%	6%	17%	4%	10%	4%

Source: 2022 5-year ACS.

The earnings of people with disabilities increased for all jurisdictions from 2017 to 2022, yet people with disabilities still have lower annual earnings than those without disabilities—and the gap widened in many jurisdictions.

The gap in median earnings between residents with disabilities and residents with no disabilities is greatest in Annapolis at \$36,900. Gaps greater than \$20,000 are also present in Howard and Anne Arundel counties. Earnings gaps have grown since 2017 in Annapolis, Anne Arundel County, and Harford County. Earnings gaps remained relatively stable since 2017 in Baltimore City and Howard County. The median earnings gap decreased substantially only in Baltimore County.

**Figure VII-11.**  
**Differences in Median Earnings for Residents with and without Disabilities,**  
**2017 and 2022**

	2017			2022		
	With a Disability	No Disability	Difference	With a Disability	No Disability	Difference
<b>Annapolis</b>	\$18,688	\$40,429	(\$21,741)	\$20,640	\$57,503	(\$36,863)
<b>Anne Arundel County</b>	\$35,443	\$47,539	(\$12,096)	\$42,240	\$62,588	(\$20,348)
<b>Baltimore City</b>	\$22,910	\$34,890	(\$11,980)	\$32,999	\$45,900	(\$12,901)
<b>Baltimore County</b>	\$26,692	\$41,976	(\$15,284)	\$39,277	\$51,154	(\$11,877)
<b>Harford County</b>	\$35,119	\$44,752	(\$9,633)	\$40,938	\$57,241	(\$16,303)
<b>Howard County</b>	\$33,586	\$58,992	(\$25,406)	\$48,657	\$73,021	(\$24,364)

Note: Earnings data are for population aged 16 and older with earnings. 5-year ACS estimates are presented due to large margins of error on 1-year ACS estimates for residents with disabilities.

Source: 2017 and 2022 5-year ACS estimates.

As shown in Figure VII-12, residents with disabilities also have much lower labor force participation and employment levels than those without a disability at about half of the labor force participation rate. This is explained by lack of awareness of employers about accommodating persons with disabilities and/or discrimination in the market, limitations on hours for work in some cases, and lack of education and training options tailored to the needs of persons with disabilities.

Residents with disabilities have higher labor force participation and employment rates in 2022 than in 2017 in all jurisdictions. Residents with disabilities saw the greatest growth in labor force participation and employment since 2017 in Baltimore City (+5 percentage points and +6 percentage points respectively).

**Figure VII-12.  
Differences in  
Employment, by  
Jurisdiction, 2022**

Note:

Labor force participation and employment are calculated for civilian noninstitutionalized population age 16 and older.

Source:

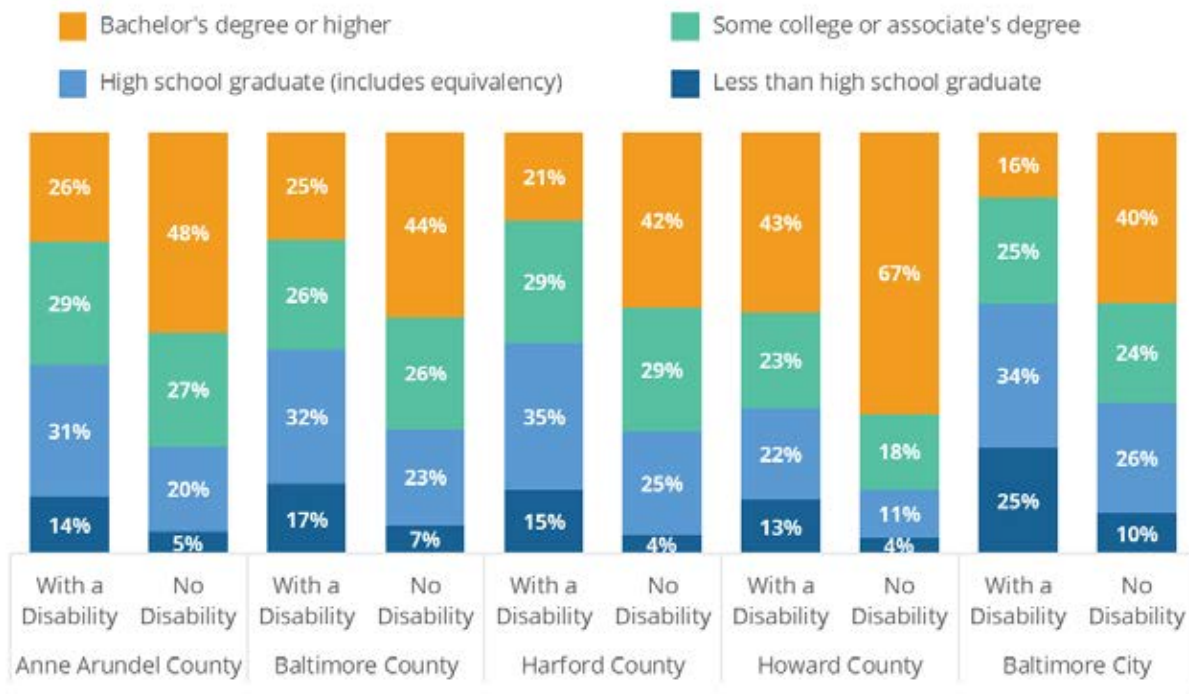
2022 5-year ACS.

	% in Labor Force		% Employed	
	With a disability	No disability	With a disability	No disability
<b>2017</b>				
<b>Anne Arundel County</b>	34%	77%	29%	73%
<b>Baltimore City</b>	24%	71%	19%	64%
<b>Baltimore County</b>	28%	73%	25%	70%
<b>Harford County</b>	30%	75%	26%	71%
<b>Howard County</b>	32%	76%	29%	73%
<b>2022</b>				
<b>Anne Arundel County</b>	35%	74%	32%	71%
<b>Baltimore City</b>	29%	71%	25%	66%
<b>Baltimore County</b>	31%	72%	27%	69%
<b>Harford County</b>	31%	73%	28%	71%
<b>Howard County</b>	32%	74%	30%	72%

Differences in educational attainment among people with and without disabilities are shown in Figure VII-13. Residents with disabilities tend to have lower educational attainment than those with no disabilities. Note, however, that residents with disabilities across the Baltimore Region have higher educational attainment in 2022 than they did in 2017: the shares of residents with disabilities with bachelor's degrees or higher increased by at least 3 percentage points in each jurisdiction, while shares of residents with disabilities who have graduated high school or completed some high school decreased by at least 3 percentage points in each jurisdiction.



**Figure VII-13.**  
**Differences in Educational Attainment by Jurisdiction, 2022**



Source: 2022 5-year ACS estimates.

**Growth in residents with disabilities.** The intersection of disability and age makes it relatively easy to project growth in the number of persons with disabilities. By 2045, the region is expected to have 139,000 more residents age 65 and older<sup>5</sup>. If 23 percent of persons age 65-74 have a disability and 48 percent of persons 75 and older have a disability, the region should expect at least 59,000 more people with disabilities by 2045. Based on the region’s current poverty rate for residents with disabilities<sup>6</sup>, at least 12,300 of these individuals will be living below the poverty level.

<sup>5</sup> Population projections from the Maryland State Data & Analysis Center.  
<sup>6</sup> According to 2022 1-year ACS data, 21% of Baltimore region residents with disabilities live in poverty.

## SECTION VIII.

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### ZONING AND LAND USE



## SECTION VIII.

# Zoning and Land Use

This section builds upon prior report sections by examining the link between housing choice and zoning and land use regulations. It begins with background on how zoning and land use decisions influence housing choice; summarizes the zoning and land use findings from the 2020 Analysis of Impediments to Fair Housing Choice (AI) in the Baltimore Region; updates the 2020 analysis by examining how current zoning and land use regulations and decisions affect housing choice; and concludes with findings.

### Why Zoning Matters

As housing affordability challenges have grown into what many are calling a “national housing crisis,” zoning and land use regulations have received more attention for their role in creating barriers to housing choice. Yet this is not a new phenomenon.

In 1917, a U.S. Supreme Court decision made racial zoning illegal in the United States. The court overturned a racial zoning ordinance in Louisville, Kentucky (*Buchanan v. Warley*) on the grounds that it violated “freedom of contract” protections, interfering with the rights of a property owner to sell their home to whomever they pleased. However, many cities, especially those in the Southern U.S., ignored the Supreme Court’s decision and continued racial zoning practices. Others enacted Euclidean, or use-based, zoning laws that segregated housing and building types—which, due to income disparities and discrimination in lending, effectively produced racial zoning. Highly desirable areas only permitted single family uses. Multifamily rentals and commercial and industrial uses were clustered in less desirable areas. Those dynamics were only exacerbated by the federal redlining practices that started in the 1930s and continued into the 1960s.

This collection of policies that can be thought of broadly as racial zoning drove many racial and ethnic minorities and immigrants into neighborhoods that were commonly the least healthy due to higher levels of pollutants, poor quality housing, and overcrowded conditions, resulting in lower property values.

The vestiges of all of these historical policies are still evident today in racial and economic segregation patterns, disparities in access to high quality schools, disparities in educational attainment, and differences in homeownership—all of which affect the ability of a household to access opportunity and build wealth. Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) today correlate quite closely with areas coded red and yellow in the federal government’s 1937 redlining map. Today’s high rates of income inequality often follow current zoning patterns. In addition, today’s R/ECAP areas are often much further from growing job centers than they were in the early 20<sup>th</sup> century.

**Exclusionary zoning today.** Zoning regulations no longer dictate where certain types of people may live. Zoning today regulates the structural environment—where residential development is allowed, the types of residential development allowed, and development density. This can have the same effect as regulating the residences of people, however, due to income disparities.

Communities rely on zoning and land use to define their character, and this typically takes precedence over expanding housing choice. Yet land use planning that embraces housing inclusivity is becoming more popular as communities recognize—and internalize—the public costs associated with exclusionary zoning. Those costs include increased traffic congestion, persistent inter-generational poverty, and stunted economic growth. Exclusionary zoning increases the cost of entry into service-rich neighborhoods which often contain the highest-performing school districts, the best access to high-paying jobs, and access (with a car) to healthy food. In this way, segregation is reinforced by limiting opportunities for low- and moderate-income residents to live in areas of opportunity.

There is no one, agreed-upon, definition of exclusionary zoning, just as there is no magic set of zoning regulations that produce perfect inclusivity of housing choice and access to opportunity. Yet some practices are better than others, and some practices are so exclusive they have been found to be illegal.

In the end, it is in the best interest of communities to examine their zoning code and land use regulations frequently to ensure they do not create barriers to housing choice. This is appropriate not only to avoid legal challenges, but also to ensure an adequate workforce, and to keep current in a national market that is increasingly demanding creative solutions to housing pressures and expansion of housing choice.

As discussed above, zoning has directly contributed to how much housing (and what types of housing) are actually built. Up for Growth, a national organization committed to solving the housing shortage and affordability crisis, produces an annual report that calculates the underproduction of housing for states, metropolitan areas, and non-metropolitan areas. The 2024 report found that the Baltimore-Columbia-Towson metropolitan area is **32,031 units short of adequately meeting the housing needs of its residents**, which represents 2.7% of the share of the region's total housing stock. Data also indicate that since 2015, underproduction has worsened in the region.

**Zoning for group homes.** Other aspects of zoning include how households, family units, and disabilities are defined. A best practice in the definition of group homes is to set the unrelated persons limit to what has been legally defensible, generally 8-12 unrelated persons, including staff.

Group home residency must be broad enough to include the homeless, those with social, behavioral or disciplinary problems, the elderly, those in hospice care, those avoiding domestic abuse, and/or disabled (which includes the frail, physically disabled,

developmentally disabled, mentally ill, persons with HIV/AIDS, and recovering from alcohol or drug addiction, but not including people currently addicted to alcohol or drugs that are not in a treatment program for recovery.

Group homes should be allowed in at least one, and preferably more, residential zoning districts—in addition to multifamily, commercial, mixed use districts. The State of Maryland Halfway House and Group Home Sites<sup>1</sup> regulation requires that Halfway Houses and Group Homes Sites licensed and in compliance with state health regulations<sup>2</sup> are allowed in the following zones:

- A small halfway house or private group home is considered conclusively a single-family dwelling for purposes of zoning, and may be located in all residential zones;
- A large halfway house or private group home is considered conclusively a multi-family dwelling for purposes of zoning and may be located in zones of similar density; and
- A halfway house or a private group home may not be made subject to any special exception, conditional use permit, or procedure that differs from that required for a single-family dwelling or a multi-family dwelling of similar density in the same zone.

Definitions of household and family should be flexible enough to allow a range of household and family configurations, especially those needed to accommodate caregivers. Language should avoid prescribing the makeup of a family unit (“husband and wife”).

The definition of disability must include what the courts have qualified as disability; those in recovery and with HIV/AIDS are often left out of the definition. A best practice is to have as broad a definition as possible to avoid multiplying the list of group facilities in ways that confuse the public and policymakers.

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<sup>1</sup> 10.63.02.04

<sup>2</sup> Health-General Article, §§8-406 and 10-518, Annotated Code of Maryland

## Findings from 2020 Analysis of Impediments

The 2020 AI's analysis of zoning regulations focused on five topics in the Fair Housing Planning Guide:

- The opportunity to develop various housing types (including apartments and housing at various densities);
- The opportunity to develop alternative designs (cluster developments, planned residential developments, inclusionary zoning, transit-oriented development);
- Minimum lot size requirements;
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e., group homes) in single family zoning districts; and
- Restrictions on the number of unrelated persons in dwelling units.

The figure below summarizes the findings from the 2020 AI.

**Figure VIII-1.**  
**Findings from 2020 Analyses of Impediments to Fair Housing Choice Zoning Review**

	Annapolis	Anne Arundel County
<b>Allowing Diversity of Housing Types</b>		
<b>Multifamily housing is allowed in a variety of districts</b>	Only allowed by right in commercial district unless fewer than 6 units, then allowed by right in one residential district	Allowed in high density districts R-10, R-15, R-22, Town Center (TC), MXD, and Odenton Town Center (O-COR, O-TRA, O-IND, O-EOD, O-NOD) districts.
<b>Attached, attainable housing is allowed in a variety of districts</b>	Only allowed by right in commercial district; special exception in other residential districts	In two districts; not integrated into districts with moderately dense single family detached homes. ADUs require a 14,000 sq ft lot.
<b>Definition of family and household and occupancy limits does not create barriers to choice</b>	"Family" is defined as one or more persons, each related to the other by blood, marriage or adoption, who are living together in a single dwelling and maintaining a common household. A family includes any domestic servants and not more than one gratuitous guest residing with the family.	No definition of family or limit on the number of unrelated persons living in a housing unit
<b>Group homes are allowed in many residential districts</b>	No	Permitted in all residential districts
<b>Mitigating Requirements that Raise Housing Costs</b>		
<b>Requirements for special review, public hearing, notices are not excessive for affordable housing</b>	Yes, for group homes.	Workforce housing must only meet conditional use requirements.
<b>Parking requirements are not excessive</b>	Parking requirements can be waived in cases where requirements may jeopardize the district	For multifamily, 1 space per bedroom (3 spaces for 3 bedrooms) and 2 spaces for detached and attached housing
<b>Providing Residential Development Incentives</b>		
<b>APFO does not apply to affordable housing developments (all types)</b>	Only for senior developments	Only for housing for "elderly of modest means"
<b>Policy of making surplus public land available for affordable housing</b>	Not identified in policies	No
<b>Inclusionary zoning/Moderately price dwelling unit policy</b>	Yes, inclusionary zoning law requires all developers of more than 10 units must also provide moderately priced dwelling units (MPDUs).	No
<b>Voluntary</b>		
<b>Mandatory</b>	Yes, for developments of more than 10 units	
<b>Fast track development for affordable housing</b>	Not identified in policies	No
<b>Fee waivers for affordable housing</b>	Not identified in policies	For housing for elderly of modest means and workforce housing.

Source: 2020 AI, Zoning and Land Use section.

**Figure VIII-1. (Continued)**  
**Findings from Zoning Review, 2020 Analyses of Impediments to Fair Housing Choice**

	Baltimore City	Baltimore County
<b>Allowing Diversity of Housing Types</b>		
Multifamily housing is allowed in a variety of districts	Yes, the city has adopted a very flexible set of districts that allow many housing types	Allowed in medium density settings, Allowed in smaller residential settings (RS.5) "subject to findings of compatibility by the hearing officer"
Attached, attainable housing is allowed in a variety of districts	Yes, the city has adopted a very flexible set of districts that allow many housing types	Single-family detached, semidetached or duplex dwellings are permitted in all "density" residential districts
Definition of family and household and occupancy limits does not create barriers to choice	Defined as: (i) an individual; (ii) 2 or more people related by blood, marriage, adoption, or State-supervised foster care, living together as a single housekeeping unit in a dwelling unit; or (iii) a group of not more than 4 people, who need not be related, living together as a single housekeeping unit in a dwelling unit.	Family is defined as "Any number of individuals lawfully living together as a single housekeeping unit and doing their cooking on the premises, as distinguished from a group occupying a boarding or rooming house or hotel."
Group homes are allowed in many residential districts	Not specifically excluded from any district	Allowed in medium density settings, Allowed in smaller residential settings (RS.5) "subject to findings of compatibility by the hearing officer"
<b>Mitigating Requirements that Raise Housing Costs</b>		
Requirements for special review, public hearing, notices are not excessive for affordable housing	New code allows a diversity of housing types by right	For group homes and multifamily in RS.5 zones
Parking requirements are not excessive	Affordable housing targeting < 60% AMI has lower parking requirements (1 space per 2 dwelling units)	Not specified in zoning code in land use and density table
<b>Providing Residential Development Incentives</b>		
APFO does not apply to affordable housing developments (all types)	N/A; the city has excess housing inventory	No, regulations do not appear to have been updated since 2006
Policy of making surplus public land available for affordable housing	Yes	Not offered
Inclusionary zoning/Moderately price dwelling unit policy	Yes, although not found to be effective in the current market	No
Voluntary		
Mandatory		
Fast track development for affordable housing	Many development incentives including use of TIF	Not offered
Fee waivers for affordable housing	Many development incentives including use of TIF	Not offered

Source: 2020 AI, Zoning and Land Use section.



**Figure VIII-1. (Continued)**  
**Findings from Zoning Review, 2020 Analyses of Impediments to Fair Housing Choice**

	Baltimore City	Baltimore County
<b>Allowing Diversity of Housing Types</b>		
Multifamily housing is allowed in a variety of districts	Yes, the city has adopted a very flexible set of districts that allow many housing types	Allowed in medium density settings, Allowed in smaller residential settings (RS.5) "subject to findings of compatibility by the hearing officer"
Attached, attainable housing is allowed in a variety of districts	Yes, the city has adopted a very flexible set of districts that allow many housing types	Single-family detached, semidetached or duplex dwellings are permitted in all "density" residential districts
Definition of family and household and occupancy limits does not create barriers to choice	Defined as: (i) an individual; (ii) 2 or more people related by blood, marriage, adoption, or State-supervised foster care, living together as a single housekeeping unit in a dwelling unit; or (iii) a group of not more than 4 people, who need not be related, living together as a single housekeeping unit in a dwelling unit.	Family is defined as "Any number of individuals lawfully living together as a single housekeeping unit and doing their cooking on the premises, as distinguished from a group occupying a boarding or rooming house or hotel."
Group homes are allowed in many residential districts	Not specifically excluded from any district	Allowed in medium density settings, Allowed in smaller residential settings (RS.5) "subject to findings of compatibility by the hearing officer"
<b>Mitigating Requirements that Raise Housing Costs</b>		
Requirements for special review, public hearing, notices are not excessive for affordable housing	New code allows a diversity of housing types by right	For group homes and multifamily in RS.5 zones
Parking requirements are not excessive	Affordable housing targeting < 60% AMI has lower parking requirements (1 space per 2 dwelling units)	Not specified in zoning code in land use and density table
<b>Providing Residential Development Incentives</b>		
APFO does not apply to affordable housing developments (all types)	N/A; the city has excess housing inventory	No, regulations do not appear to have been updated since 2006
Policy of making surplus public land available for affordable housing	Yes	Not offered
Inclusionary zoning/Moderately price dwelling unit policy	Yes, although not found to be effective in the current market	No
Voluntary		
Mandatory		
Fast track development for affordable housing	Many development incentives including use of TIF	Not offered
Fee waivers for affordable housing	Many development incentives including use of TIF	Not offered

Source: 2020 AI, Zoning and Land Use section.

The 2020 AI identified the following observations and barriers:

- **Anne Arundel County.** Undeveloped land by right for medium- and high-density residential development remains limited; however, the County has a unique opportunity to implement more inclusive land use regulations as part of its current comprehensive plan update. Recommendations included extending districts that allow multifamily development by right in areas that are well served by transit, consideration of adopting an inclusionary zoning police, and to monitor the effectiveness of expanded districts that allow affordable housing developments. The recommendations also included removing the conditional use designation on affordable housing developments to make them more financially feasible, as well as exempting family affordable housing from the County's Adequate Public Facilities Ordinance (APFO) school test to allow affordable development to proceed.
- **Baltimore City.** Baltimore City updated its zoning code in 2017 with a focus on maintaining neighborhood character, incorporating alternative transportation modes, and embracing mixed-use districts. The code also provides incentives to create affordable housing, senior housing, and accessible housing by exempting developments from district regulations. Recommendations included revising the definition of "family" to make it easier for residents living in group home settings to live in residential districts.
- **Baltimore County.** New development is severely limited due to the County's conservation-based land use plan. Recommendations included expanding mixed-use districts, compatible uses, and shared parking arrangements, as well as providing incentives for deeply and moderately affordable multifamily housing, especially along light rail lines. Clarifying the definition of "family" and allowing group homes to be allowed by right in the DR5.5 districts were other primary recommendations.
- **Harford County.** Recommendations to improve housing choice in Harford County included allowing group homes by right in at least one residential district (preferably more), addressing the limit on unrelated persons in group homes, allowing duplexes and townhomes to be allowed by right in more zoning districts, and expanding incentives for affordable housing development, such as fast track development, fee waivers, and APFO exemption.
- **Howard County.** Recommendations to improve housing choice in Howard County included addressing the limit on unrelated persons in group homes, embracing "dynamic zoning" best practices to help reduce development costs and embrace transportation alternatives, consider implementing recommendations from the 2018 Development Regulations Assessment, and continuing exempting MIHU from APFO.
- **Annapolis.** The City of Annapolis had a separate AI completed in 2015 that was not done in concert with the 2012 regional and jurisdictional AIs. Recommendations from

that report included revising the definition of family, expanding the location of where group homes for persons with disabilities are allowed by right in residential districts, expanding where duplexes and townhomes are allowed by right, and exempting both affordable family and senior housing from APFO.

## Land Use and Development

Similar to past AIs, constraints on new development are due primarily to conservation and preservation land uses, and agricultural uses, as well as very few areas where multifamily housing is allowed. As such, this review begins with an examination of land use and development patterns in the region.

The 2020 AI report used data provided by the Maryland Department of Planning to show the distribution of land (measured by acres) by type of use for the study area. The state has not yet updated that report; instead of drawing from that state report again, this report uses a custom analysis.

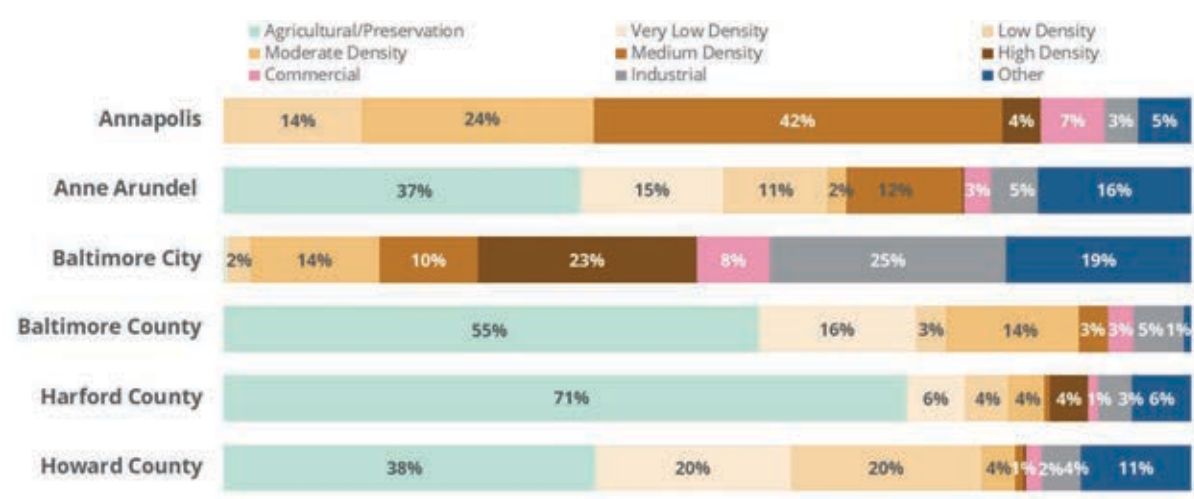
Data for the analysis was drawn from relevant zoning and land use files in each jurisdiction's respective open data portal. For the purposes of estimating the distribution of land use by acre, the following assumptions were applied:

- **Agricultural/Preservation** | No housing allowed or one unit per >1 acre (for example, a farmhouse);
- **Very Low Density** | One unit per acre (lot size of approximately 43,000 square feet);
- **Low Density** | 2-3 units per acre (equivalent to lot sizes of 13,000 to 20,000 square feet);
- **Moderate Density** | 4-8 units per acre (ranging from typical large suburban lots to new urbanist development lots);
- **Medium Density** | 9-20 units per acre (accommodates townhomes and rowhomes and small multifamily);
- **High Density** | >20 units per acre (medium to large multifamily);
- **Commercial**
- **Industrial**
- **Other** | This category included open space and other mixed-use zones/land uses that were not identified as explicitly residential, commercial, or industrial, including universities.

Figure VIII-2 shows acres of land zoned by density range for the AI jurisdictions. As demonstrated by the figure, except for Baltimore City and Annapolis, the majority of land is zoned for forest, agriculture, or other preserved land. Collectively, very low density and low density uses also make up a significant portion of land in the region.

Land dedicated to commercial and industrial use is very small for all areas other than Baltimore City. Given that some codes allow high-density multifamily and mixed-uses in commercial and industrial areas—and that these areas often contain the least expensive land that can be repurposed for affordable and mixed-income housing—the small amount of land zoned for commercial and industrial use can be a factor limiting housing opportunities, as well as jurisdictional economic development and stability.

**Figure VIII-2.**  
**Acres of Land Zoned by Density Range by Jurisdiction**



Source: Jurisdictions' Open Data Portals (Land Use and Zoning shapefiles) and Root Policy Research.

Figure VIII-3 shows the share of acres of land zoned by density range by jurisdiction.

- Baltimore County (39%) and Harford County (31%) have the highest shares of the region's land zoned for agriculture, forest, and other preservation land in the region.
- Baltimore County (42%) and Anne Arundel County (26%) account for the most acres of land in the region that is zoned for very low density residential while Howard County (37%) and Anne Arundel County (33%) have the most acres of the region's land zoned for low density residential.

This is balanced, somewhat, by land zoned for moderate to medium density. Anne Arundel also has most of the acreage in the region zoned for moderate density residential (55%) while Baltimore County has most of the region's land zoned for medium density residential (61%).

- Baltimore City accounts for a disproportionate share of the region's acres zoned explicitly for both high density residential (65%) and industrial land (32%).

**Figure VIII-3.**  
**Share of Acres of Land Zoned by Density Range, Baltimore Region Jurisdictions**

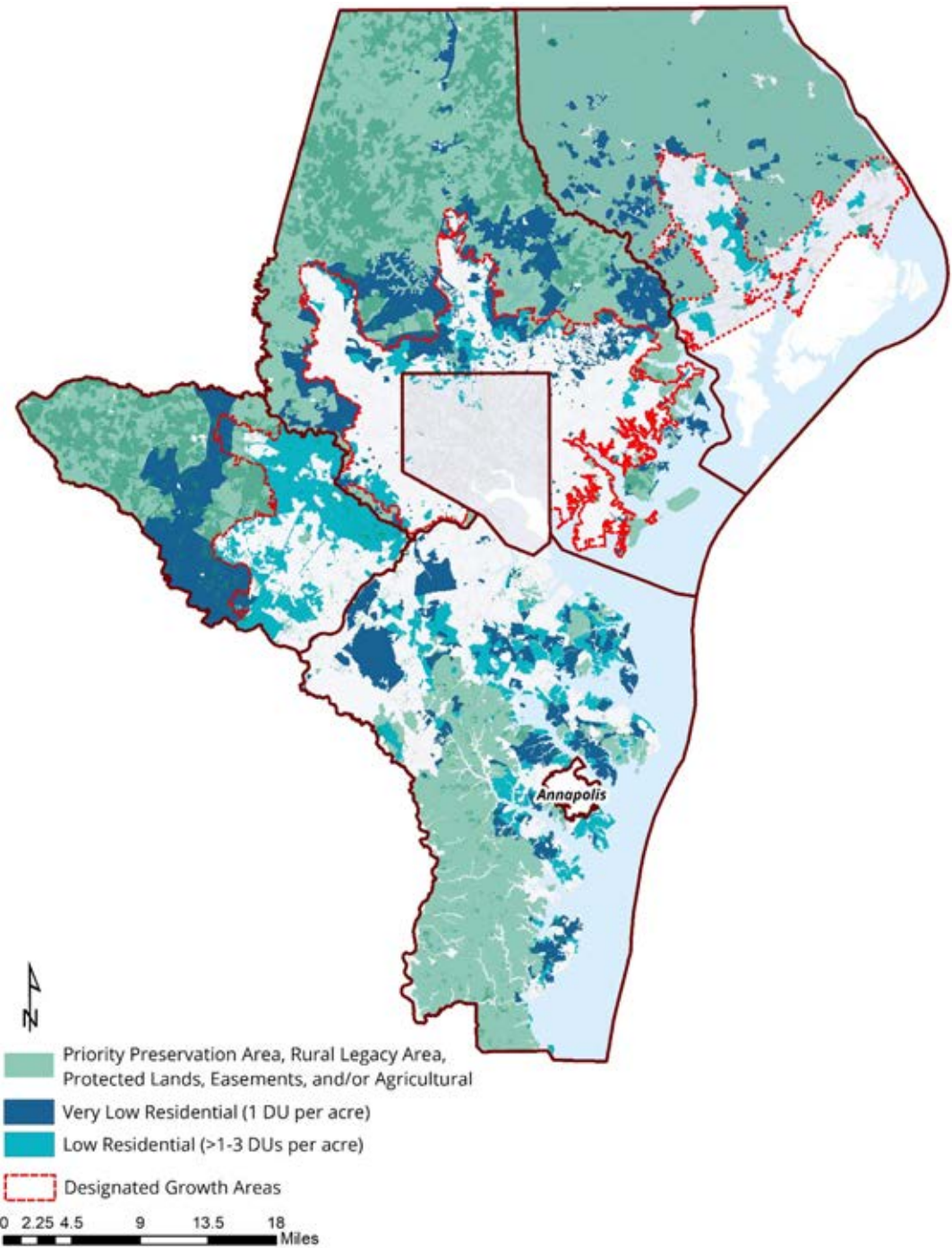
	Forest, Ag, Preserved	Very Low Density	Low Density	Moderate Density	Medium Density	High Density	Commercial	Industrial	Other	Total
ANNE ARUNDEL	18%	26%	33%	55%	6%	2%	24%	18%	43%	100%
BALTIMORE COUNTY	39%	42%	14%	21%	61%	0.5%	34%	29%	3%	100%
HARFORD	31%	10%	13%	2%	11%	30%	9%	12%	16%	100%
HOWARD	11%	22%	37%	2%	7%	2%	9%	9%	19%	100%
ANNAPOLIS	0%	0%	1%	3%	1%	1%	1%	0%	0%	100%
BALTIMORE CITY	0%	0%	2%	17%	14%	65%	23%	32%	18%	100%
Baltimore City share of region	0%	0%	2%	17%	14%	65%	23%	32%	18%	8%
Suburban share of region	100%	100%	98%	83%	86%	35%	77%	68%	82%	92%

Source: Jurisdictions' Open Data Portals (Land Use and Zoning shapefiles) and Root Policy Research.



Figure VIII-4 maps where agriculture, forest, and preserved lands, as well as very low and low density residential land, are zoned in the region.

**Figure VIII-4.**  
**Land Designated as Agricultural/Preservation, Very Low Density, and Low Density, Baltimore Region**



Source: Jurisdictions' Open Data Portals (Land Use and Zoning shapefiles) and Root Policy Research.



The 2020 AI identified that given the restrictions on high density development in much of the counties, future growth will need to be absorbed through:

- Redevelopment of existing uses;
- Expanding density in areas where it is already allowed; and
- Adding mixed-use development opportunities.

As such, for areas outside of Baltimore City, this means taking steps to increase the amount of land for moderate and medium density uses, expanding high density areas, and repurposing aging commercial and industrial uses into mixed-use developments with integrated residential, retail, services, and employment uses. One current way this is achieved is through the comprehensive rezoning process, which provides a window of opportunity for property owners to apply to the county to rezone their land. Additionally, several recently updated general/comprehensive plans have called for updating zoning regulations to allow *context-sensitive density increases*. Additionally, creative repurposing, “dynamic zoning” practices, and embracing mixed-use districts will all be important to accommodate residential demand.

Figure VIII-5 provides an overview of the residential construction permitted by jurisdiction. It is separated into two time frames: 1990 to 2009, and 2010 to 2022.

The region has experienced a significant shift between single family and multifamily development after 2009. Between 1990 and 2009, nearly a quarter (23%) of units permitted were for multifamily development. Conversely, from 2010 to 2022, more than four in ten (42%) units permitted in the region were for multifamily housing. All jurisdictions increased the share of multifamily units permitted, with the largest percentage point shifts occurring in Baltimore City, followed by Howard and Harford Counties. The figure also shows the average value of construction by permit type and jurisdiction in 2022. In all jurisdictions, multifamily construction is lower on a per unit basis than the cost of single-family construction, which should result in more affordable multifamily units.

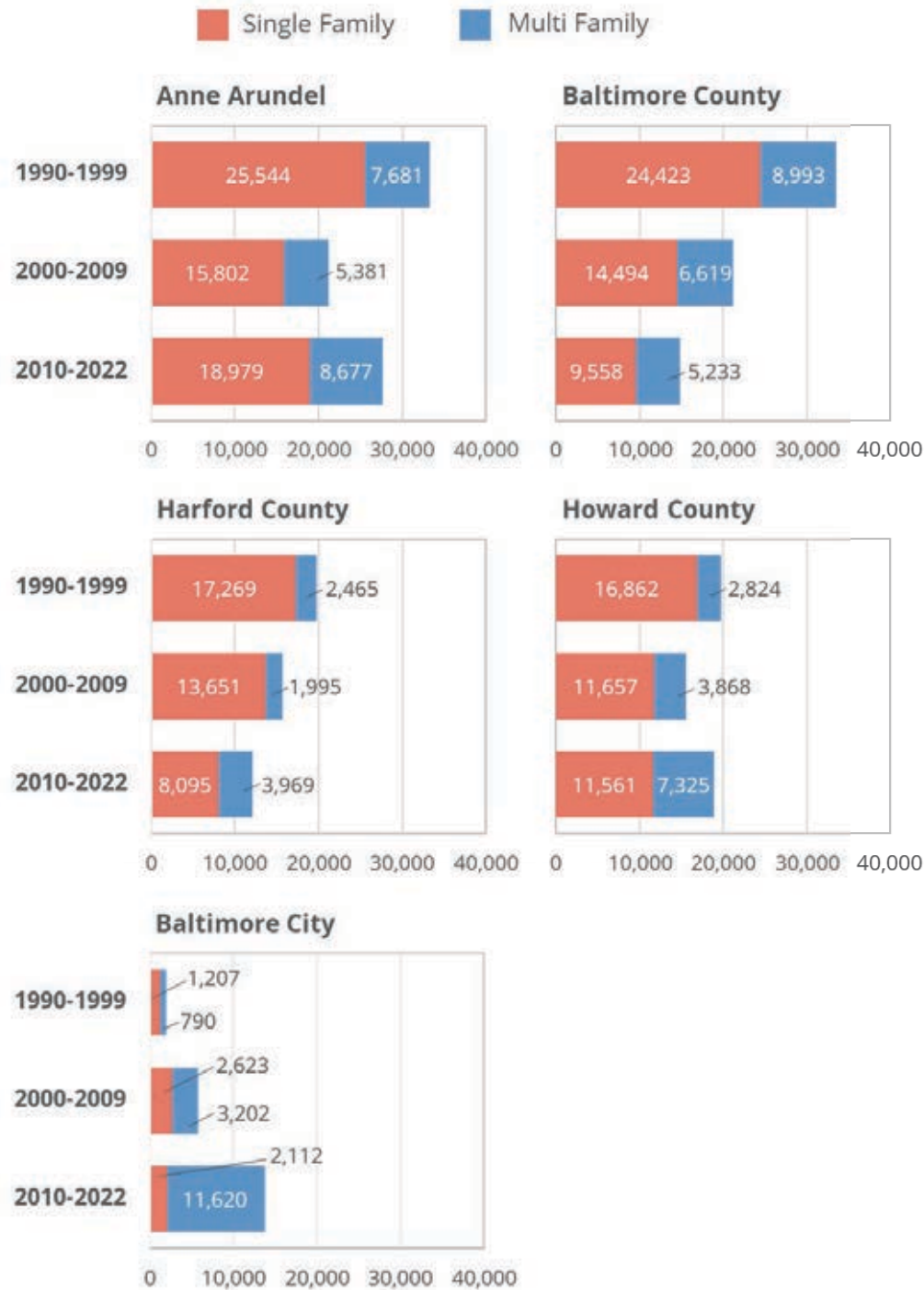
**Figure VIII-5.**  
**Residential Permitting History, 1990-2022**

Housing Units Permitted by Housing Type, 1990-2009	Single Family		Multifamily	
	% of Jurisdiction	% of Region	% of Jurisdiction	% of Region
ANNE ARUNDEL	76%	29%	24%	30%
BALTIMORE COUNTY	71%	27%	29%	36%
HARFORD	87%	22%	13%	10%
HOWARD	81%	20%	19%	15%
BALTIMORE CITY	49%	3%	51%	9%
<b>TOTAL REGION</b>	<b>77%</b>	<b>100%</b>	<b>23%</b>	<b>100%</b>
Housing Units Permitted by Housing Type, 2010-2022	Single Family		Multifamily	
	% of Jurisdiction	% of Region	% of Jurisdiction	% of Region
ANNE ARUNDEL	69%	38%	31%	24%
BALTIMORE COUNTY	65%	19%	35%	14%
HARFORD	67%	16%	33%	11%
HOWARD	61%	23%	39%	20%
BALTIMORE CITY	15%	4%	85%	32%
<b>TOTAL REGION</b>	<b>58%</b>	<b>100%</b>	<b>42%</b>	<b>100%</b>
Average Value (by Unit) of Permits by Type, 2022	Single Family Homes		Multifamily (5 or more units)	
ANNE ARUNDEL	\$227,230		\$125,747	
BALTIMORE COUNTY	\$241,130		\$207,500	
HARFORD	\$388,618		\$148,683	
HOWARD	\$287,005		\$203,469	
BALTIMORE CITY	\$206,772		\$126,850	

Source: Maryland Department of Planning, Planning Services

Figure VIII-6 graphs the numbers of single family and multifamily units permitted between 1990 and 2022 for all jurisdictions, dividing them into three time periods, rather than two. Comparing all three time periods, all jurisdictions have seen a decrease in the share of permits dedicated to single family detached units compared to multifamily permits. Baltimore City is the only jurisdiction that issued more multifamily permits than single family permits across the three time periods (2000 to 2009 and 2010 to 2022).

**Figure VIII-6.**  
**Single Family and Multifamily Housing Units Permitted from 1990-2022, All Jurisdictions**



Source: Maryland Department of Planning, Planning Services and Root Policy Research.

Figure VIII-7 shows the average annual number of residential permits issued in the three time periods examined.

**Figure VIII-7.**  
**Average and Total Residential Units Permitted, 1990-2022**

Units Permitted	Average Annual Permits				Total Permits		
	1990-2009	2010-2018	2019-2022	Difference 2010-2022	1990-2009	2010-2018	2019-2022
<b>Multifamily</b>							
ANNE ARUNDEL	653	737	511	(142)	13,062	6,633	2,044
BALTIMORE COUNTY	781	418	367	(414)	15,612	3,765	1,468
HARFORD	223	225	486	263	4,460	2,025	1,944
HOWARD	335	659	349	14	6,692	5,931	1,394
BALTIMORE CITY	200	757	1,201	1,001	3,992	6,815	4,805
<b>Single Family</b>							
ANNE ARUNDEL	2,067	1,425	1,538	(529)	41,346	12,827	6,152
BALTIMORE COUNTY	1,946	760	679	(1,267)	38,917	6,841	2,717
HARFORD	1,546	623	623	(923)	30,920	5,603	2,492
HOWARD	1,426	979	688	(738)	28,519	8,808	2,753
BALTIMORE CITY	192	175	135	(57)	3,830	1,572	540

Source: Maryland Department of Planning and Root Policy Research.

## Land Use Planning in the State of Maryland

Residential development in Maryland is influenced by state law, which mandates that every jurisdiction review and, if necessary, update its comprehensive plan every ten years. In 2019, the General Assembly passed legislation to require that these updates contain a housing element, which must include “goals, objectives, policies, plans, and standards and address the need for affordable housing within a county, including workforce housing and low-income housing.” However, unlike some states, jurisdictions are not required to commit to develop housing to meet identified needs.

In 2021, the Maryland General Assembly passed HB 90, which establishes a State duty to affirmatively further fair housing and requires an assessment of fair housing to be included in each comprehensive plans housing element.

The state also requires a “build-out analysis” or “buildable lot inventory” in comprehensive plans. This is an estimate of the total amount of development that may be built in an area under a certain set of assumptions, including applicable land use laws and policies (e.g., zoning), environmental constraints, etc. Additionally, the state requires jurisdictions to develop both Municipal Growth Element and Water Resources Element in order to rezone land. The Municipal Growth Element, which is developed based on population projections, requires municipalities to identify areas for future growth consistent with that jurisdiction’s long-range vision. The Element also identifies needs for land and infrastructure.

It should be noted that these State requirements come with no actual State oversight or authority over approval of local Comprehensive Plans. For charter county-level jurisdictions, like the ones participating in this study, the Maryland Department of Planning (MDP) will only comment once on a draft Comprehensive Plan, and even then only if specifically requested by the local government. There is no need for MDP to approve the plan as meeting State requirements, and MDP has no authority to hold up a plan’s local approval if they believe it does not meet those standards. Any test of a Comprehensive Plan’s fulfillment of State requirements would only come in response to a private legal challenge.

In April 2024, as part of his administration’s effort to address the state’s housing shortage, Governor Wes Moore signed House Bill 538 (“Housing Expansion and Affordability Act”), which “incentivizes the construction of new housing by removing barriers to development that have contributed to the current supply shortage.”<sup>3</sup> Specifically, the bill:

- Preempts a jurisdiction from prohibiting manufactured or modular homes in zones that allow for single-family residential uses;

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<sup>3</sup> <https://governor.maryland.gov/news/press/pages/governor-moore-signs-housing-legislation-to-make-maryland-more-affordable.aspx>

- Establishes three distinct paths for utilization of a density bonus, including for formerly state-owned properties, projects that are within transit-oriented development areas, and nonprofit developers of affordable housing; and
- Prohibits jurisdictions from imposing any unreasonable limitations or requirements on a qualified affordable housing project.

The original drafting of the bill also included a provision that stated that projects receiving LIHTC or certain DHCD multifamily funding could not be denied a permit on the basis of APFO. Additionally, the legislation stated that affordable housing developments could not be denied on the basis of APFO related to the project's "viability, affordability, or density." However, these provisions were struck down by the Maryland General Assembly. The bill goes into effect on January 1, 2025.

**Public support for housing and transportation.** In 2024, the Baltimore Metropolitan Council, with funding from the Baltimore Regional Transportation Board (the region's metropolitan planning organization), commissioned public opinion research to better understand the region's attitudes toward housing and transportation needs and challenges. That multi-week engagement of a roughly representative cohort of nearly 100 residents of the region found that:

- Cost of living ranks high on people's concerns, with nearly everyone either having personal experience of struggling with housing costs, knowing friends or family who have struggled, or feeling lucky that they currently have an affordable home and don't need to look for a new one in the current housing market.
- The idea that a shortage of habitable homes overall is at the root of rapidly rising costs makes sense to most people, and many people are receptive to information on that topic from real estate experts through the media and otherwise.
- Baltimore City's new ambitious plan to rehabilitate its long-vacant homes at scale won almost unanimous regional support, with seven in ten even saying they think it is worth spending their tax dollars to accomplish that costly goal.
- Adding new homes near existing transit also won support from three-quarters of our regional cohort, especially when seeing examples, like Owings Mills Metro Centre or Woodberry near the light rail in Baltimore City.
- Adding homes to existing job centers also won broad support, especially when people saw existing examples, like Hunt Valley Town Centre and Annapolis Town Center.
- Most participants even thought crowded schools should not be able to block the building of new homes – that sensitively carried-out adjustments to school attendance boundaries were justified, if necessary, to balance attendance. Current



parents were disproportionately represented among the minority of opponents of this view.

An analysis of where zones that allow multifamily housing to be developed by right with census tracts and their “opportunity” designation is provided for each jurisdiction below in the Zoning and Land Use Review section.

**Adequate Public Facilities Ordinance and housing choice.** The Adequate Public Facilities Ordinance, or APFO, is a state-allowed growth management tool that jurisdictions may adopt to align growth with capital facilities needed to support such growth.

The application of APFO works differently in different regions and jurisdictions: Jurisdictions can determine the types of infrastructure and service categories evaluated, and the criteria for evaluation. **In the Baltimore region, school capacity is a major component of APFO application.**

Although APFOs can help ensure that adequate infrastructure is in place to accommodate new residential construction, APFO is not without problems. Critics of APFO have found the practice “poorly linked to capital improvement plans,” inconsistent with planning goals, and a factor in rising housing costs.<sup>4</sup>

In addition, APFO incorrectly assigns the impacts on services to new residential development and ignores that changes in the occupancy of existing development can also create service demands (e.g., a family moves into a home formerly occupied by a childless family). In effect, APFO raises the cost of new development to subsidize the service demands of existing development.

Similarly, a recent analysis by the Maryland Department of Housing and Community Development refers to Up for Growth housing shortage calculations based on reduced household formation now compared to 25 years ago. That analysis indicates people are already living here but in more crowded homes than they would like. As a result, adding homes for them would not itself add student population to the area.<sup>5</sup> As a public policy proposal, Gov. Moore has introduced 2025 State legislation – the Housing for Jobs Act – that would require local governments to include adjacent schools in their calculation of capacity before denying or delaying residential development under their adequate public facilities ordinance.<sup>6</sup>

Finally, APFO can have implications for public funds: A recent study of APFO adjustments in Howard County determined that implementing changes in APFO to further slow growth

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<sup>4</sup> <http://smartgrowth.umd.edu/APFOMaryland.html>

<sup>5</sup> <https://dhcd.maryland.gov/TurningTheKey/Documents/Housing-Supply-Benefits-Schools-Handout.pdf>

<sup>6</sup> <https://mgaleg.maryland.gov/mgawebsite/Legislation/Details/sb0430?ys=2025RS>

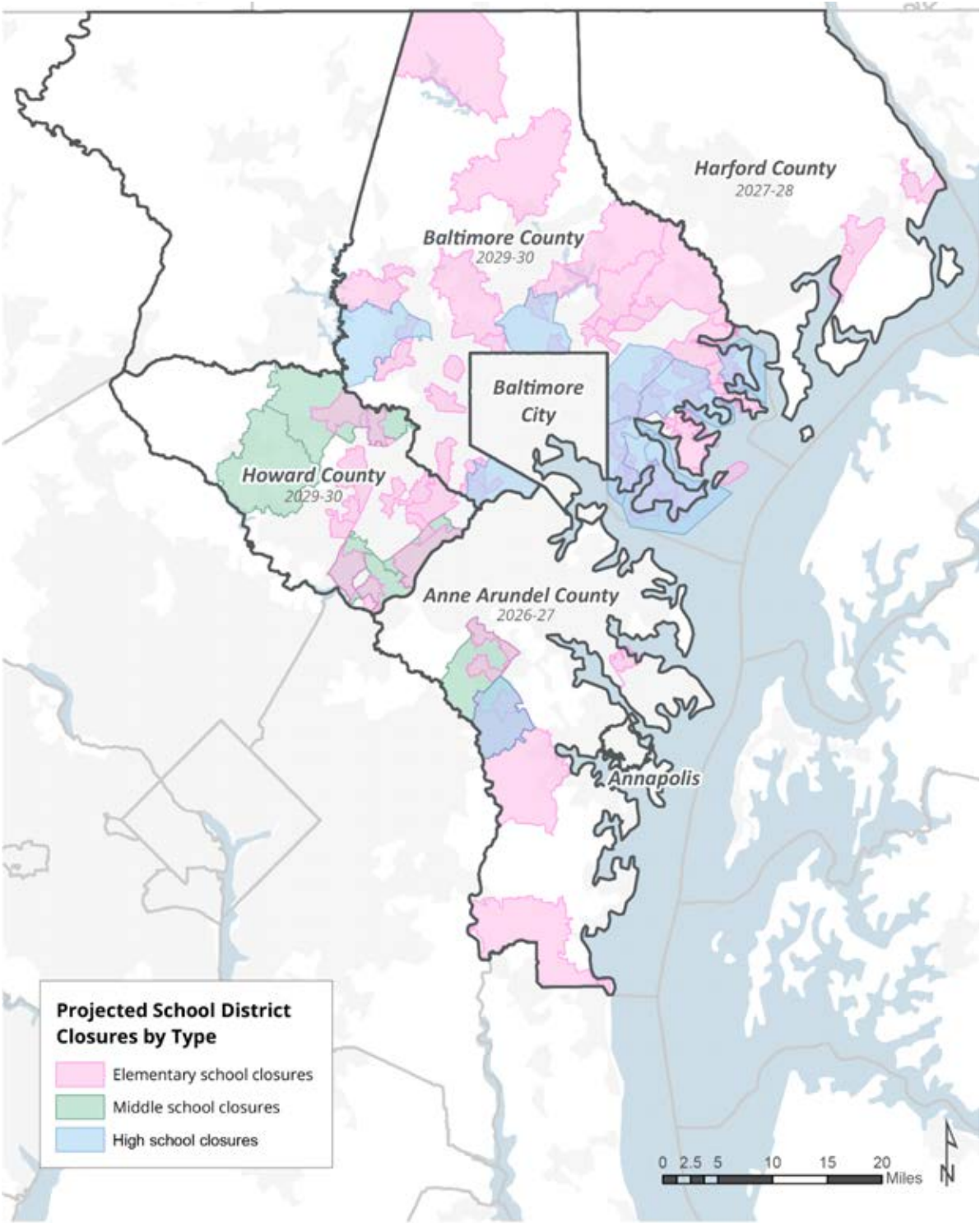
would have a significant and negative impact on county revenues, due to the deferred revenue from property tax collections and the potential for lost jobs.<sup>7</sup>

Figure VIII-8 shows projected school closures by district boundaries based on each county's respective APFO school capacity limits. The years articulated under each county name represent the academic year in which it is projected that school capacity will exceed each county's respective adequate school facilities test limit.

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<sup>7</sup> APFO Amendment Fiscal Impact Analysis, Howard County, February 2019, Urban Analytics, University of Baltimore—Jacob France Institute, Artemel & Associates, Inc.

**Figure VIII-8.**  
**Projected School Closures by County APFO School Capacity Limits,**  
**Baltimore Region**



Note: School boundaries are based on 2022-2023 data.

Source: Baltimore Metropolitan Council and Root Policy Research.

**Fair housing implications of APFO.** From a fair housing perspective, the application of APFO is a concern because of the potential to create even more barriers to accessing educational opportunity for lower income families with children, and, as such perpetuate inequitable environments. This occurs because:

- 1) Families who can afford to purchase existing homes—typically non-Hispanic White and Asian families because they have the incomes to buy—are not affected by APFO growth controls. If homes are for sale, they can access high quality schools, even when these schools are “closed.”
- 2) Families who cannot afford to purchase a home must find rental units near desired schools. Renters are disproportionately non-White and Hispanic residents.
- 3) If multifamily units are not available in areas where closed (and often high quality) schools are located, higher income families can access quality schools through purchasing resale homes in a way that families living in apartments cannot.

**Recommendation:** One solution to this potential fair housing challenge is to exempt affordable housing from APFO school tests, which the Housing Expansion and Affordability Act attempted to do. Exempting affordable housing—for both families and seniors—from APFO is unlikely to have a substantive impact on school capacity and would avoid potential fair housing challenges.

Another solution is one Montgomery County adopted in late 2020, recognizing its own housing shortage and that school crowding-related moratoria on homebuilding robbed the county of badly needed revenue to update its school infrastructure. After careful County and stakeholder deliberation of data on school enrollment and housing trends, the Montgomery County Council adjusted its impact fees based on that data and on its housing policy goals, and it repealed its construction moratorium altogether. Now it is the responsibility of Montgomery County Public Schools to balance its student enrollment, and the County has one less impediment to generating the local revenue it needs to help the school system keep its infrastructure adequate and up to date.

## **Zoning and Land Use Review**

This final section summarizes the results of the supplemental zoning and land use review. It focuses on:

- Allowing a range of housing types, especially those that promote and produce affordable housing and housing for special populations;
- Mitigating requirements that raise housing costs; and
- Providing incentives for residential development.

## Anne Arundel County

**Growth and building permit trends.** Between 1990 and 2009, Anne Arundel County averaged 753 multifamily permits a year, compared to more than 2,000 single family permits on average. Collectively, during this same time period, 41,346 permits were issued for single family housing while 13,062 permits were issued for multifamily housing—a ratio of more than 3:1.

However, since 2010, the ratio of permits issued for single family housing has decreased relative to the amount issued for multifamily housing. Between 2010 and 2018, the County issued an average of 1,425 single family permits and 737 multifamily permits. Overall, two single family units were permitted for every one multifamily unit. More recently, the ratio of single family units compared to multifamily units has ticked up over the last few years; however, with the implementation of the County's General Plan, Plan2040, the trends could look more similar to the 2010-2018 time period in terms of what housing is permitted.

**Current zoning regulations.** The 2020 AI zoning review found that Anne Arundel County made encouraging progress toward reducing barriers to housing choice for low-income households since the last zoning review in 2012. A review for this report found that current zoning regulations have remained largely the same since 2020, although, as explained later in this section, this analysis does not include the future impact of the Housing Attainability Act, passed in October 2024, which adjusts zoning yield on parcels with unbuildable portions.

Anne Arundel County allows group homes of no more than eight persons, other than staff, by right in all residential zones in the county. However, group homes that have between 9 and 16 people, are considered conditional uses in all residential zones.

Figure VIII-9 shows where multifamily housing can be built in Anne Arundel County. By right, multifamily housing is allowed in the R10, R15, and R22 residential districts, as well as the mixed-use, town center, and Odenton Town Center districts (with the exception of the historic districts). Collectively, multifamily housing is allowed by right on 3.4% (8,890 acres) of all land in the county. Additionally, multifamily housing is allowed by right in the BRAC Mixed Use Development area, the BWI Mixed Use overlay zone, the BWI Fort Meade Growth Area, the county's eleven commercial revitalization areas (located along commercial highway corridors in the county), and the Glen Burnie Sustainable Community overlay zone.<sup>8</sup> Planned unit developments are also allowed in Anne Arundel County, which allow for a variety of housing types and uses to be built at varying densities.

Multi-family is allowed conditionally in the County's C1, C2, and C3 commercial districts, as well as its Small Business (SB) district, as long as housing is developed in conjunction with another use. It is also allowed conditionally in the R1, R2, and R5 residential districts.

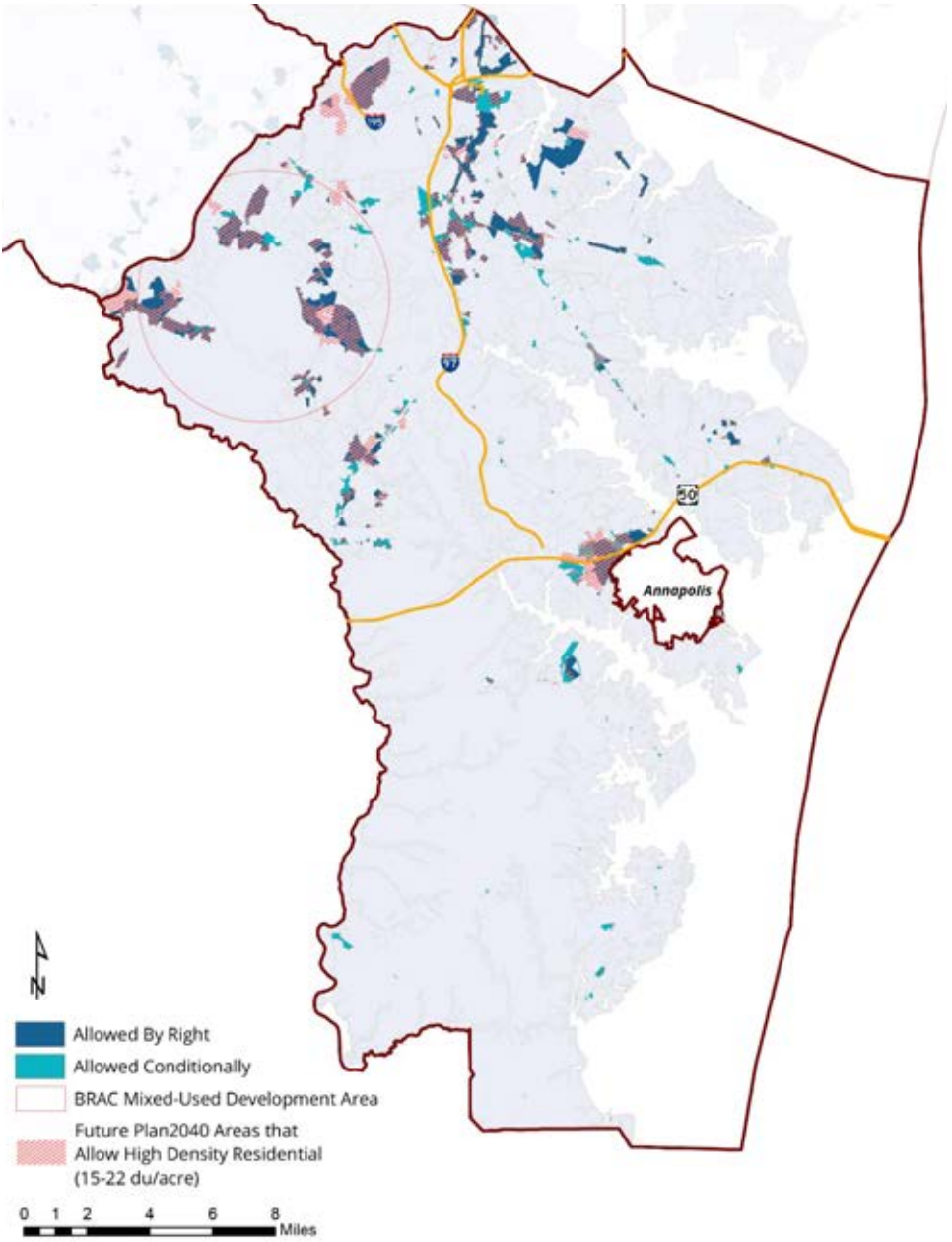
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<sup>8</sup> Shapefiles were unavailable for the BWI Fort Meade Growth Area and the Glen Burnie Sustainable Community Area; as such, these areas are not shown in Figure VIII-X.

Additionally, Figure VIII-9 shows where the County has *designated future* High Density Residential, Mixed Use, and Town Center land uses to be developed, as articulated in Plan2040, the County's most recent general plan. These areas mostly overlap with where multifamily housing is already allowed to be built in the county.



**Figure VIII-9. Multifamily Housing Allowed By Right and Conditionally, Anne Arundel County**



Source: Anne Arundel County and Root Policy Research.

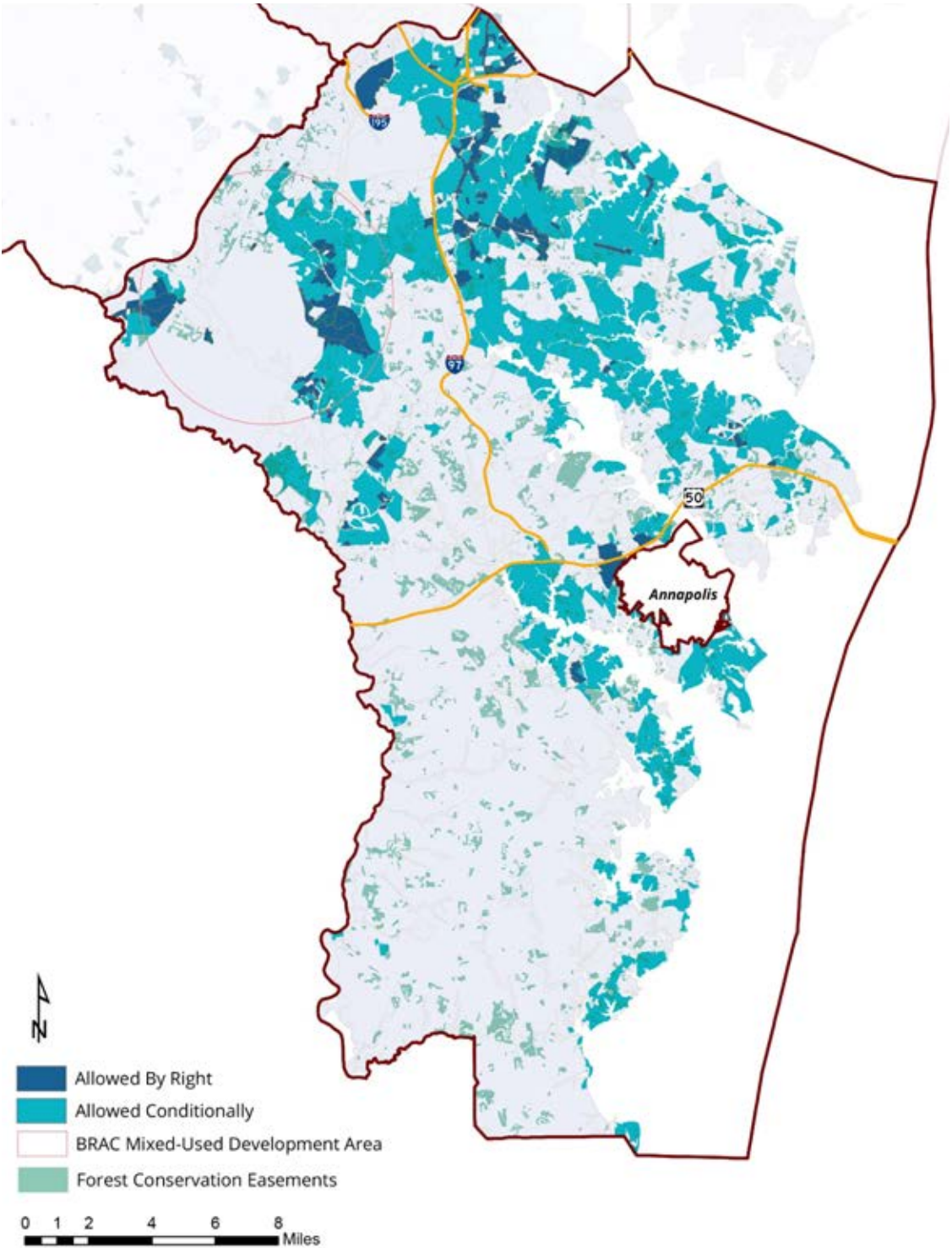
Figure VIII-10 shows where duplexes and semidetached housing are allowed in the county.<sup>9</sup> These housing types are allowed by right in the R10 and R15 districts, as well as the Odenton Town Center. Duplexes and semidetached housing are considered a special exception use in the R2 zone and conditional in the R5 zone. These housing types are allowed by right on approximately 2.5% of land in the county (by acreage), while they are considered a conditional or special exception use on nearly a quarter of land (23%).

Townhomes are allowed by right in mixed use districts and the Odenton Town Center, with the exception of OTC-Historic 10 zone (Figure VIII-11). Townhomes are allowed conditionally in the R1, R2, R5, R10, R15, and R22 residential zones, as well as the C1 and C3 commercial zones. It is also a conditional use in the Town Center zone. While townhomes are allowed by right on just 1% of the county's land, they are considered a conditional use on approximately 41% of land.

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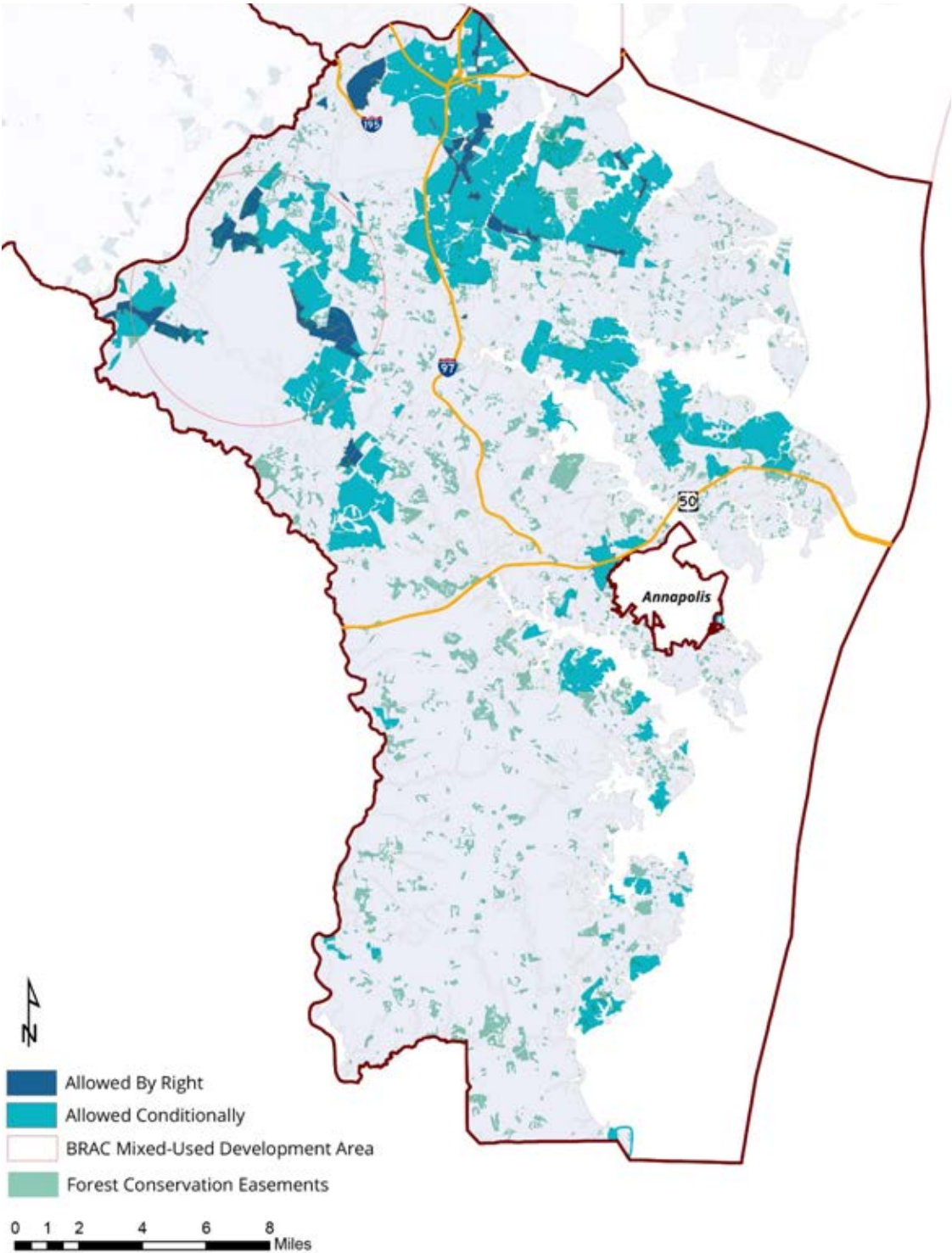
<sup>9</sup> Anne Arundel County defines duplex as "a structure containing two dwelling units one on top of the other." Semidetached is defined as "a structure that contains two dwelling units one on top of the other."

**Figure VIII-10. Duplex/Semidetached Housing Allowed By Right and Conditionally, Anne Arundel County**



Source: Anne Arundel County and Root Policy Research.

**Figure VIII-11. Townhomes Allowed By Right and Conditionally, Anne Arundel County**



Source: Anne Arundel County and Root Policy Research.

**Zoning as a barrier to housing production.** Acknowledging that zoning is a barrier to housing production, the County's FY 2021-FY 2025 Consolidated Plan articulates that its ability to "upzone" is possible in designated growth and transition areas—however, those opportunities are limited. The Consolidated Plan describes that approximately 19% of its land is designated as "critical area" by the State of Maryland while nearly 37% of its land is designated as agricultural, parks, recreational, and open space.

Notwithstanding its land constraint challenges, the County's most recent General Plan, *Plan 2040*, articulates goals and policies related to updating zoning/development regulations to increase housing choice. Two goals explicitly cite the need to update the County's zoning regulations:

*"Provide for a variety of housing types and designs to allow all residents housing choices at different stages of life and at all income levels (Goal BE11)."*

*"Revitalized and stabilize existing communities in order to preserve physical character, capitalize on investments and infrastructure, strengthen and beautify neighborhoods, and create economically, socially, and environmentally sustainable communities (Goal BE13)."*

Policies within these goals highlight the need to:

- "Review zoning and development regulations and amend to allow for a variety of residential forms, densities and sizes in stable communities throughout the county (Policy BE11.2)."
- "Update the zoning and development codes to create better tools for the type of development that the County wants to promote – redevelopment, adaptive reuse, infill, and mixed-use (Policy BE13.2)."

Additionally, one of the goals of the plan related to the built environment is:

*"Ensure the County's workforce, elderly and other vulnerable populations have access to an adequate supply of housing in a variety of neighborhoods that is affordable for a range of income levels. (Goal BE12)."*

In 2019, the County passed a Workforce Housing bill (Bill 54-19) allowing workforce housing to be built at 22 units per acre as a conditional use in the R-5, R-10, and R-15 residential zones, as well as other commercial, light industrial, and mixed-use zones if affordable homes are included in the development. In exchange for affordable units, the bill exempts workforce housing from the need to pay 50% of its capital facility connection fees (e.g., water and sewer). Workforce housing is targeted at renters with incomes of 60% AMI or less and homeowners with incomes up to 100% AMI (the General Plan's goal calls for meeting the homeownership needs of households with incomes up to 120% AMI).

On October 7, 2024, the Council passed the Housing Attainability Act, creating an inclusionary zoning policy requiring developers of developments with 20 or more units



(with the exception of those built in Rural Agricultural and Residential Low Density districts) to provide 10% of homeownership units as affordable and 15% of rental units as affordable. Affordability is defined as 100% AMI and less for homeownership units and 75% AMI and less for rental units. Developers building 1-9 units are exempt from the policy and those developing 10-19 units may build or utilize a fee-in-lieu option.

Crucially, the bill also adjusts how development capacity is calculated. Rather than applying the zoning density only to the buildable portion of the lot, the new ordinance calculates the allowable density based on the full dimensions of the lot, with the construction itself still limited to the buildable portion of the parcel. The bill also allows supplemental housing types (triplexes, fourplexes, multiplexes, townhomes) in some residential settings and provides impact fee credits and capital facility connection discounts.<sup>10</sup> That adjustment should increase the housing yield of current zoning, and make additional building financially feasible, but only time will show the specific results.

The County's Housing for Elderly of Moderate Means law allows multifamily housing serving low income seniors—60% of the units must be available to seniors with incomes up to 60% AMI while the remaining 40% are available to those with incomes up to 80% AMI—to be developed up to densities of 22 units per acre as a conditional use in R-2, R-5, R-10, R-15, and R-22 residential zones and C-1, C-2 and C-3 commercial zones. As noted previously, this development type is completely exempt from water and sewer fees.

Anne Arundel County continues to waive impact fees for housing serving households earning 120% AMI and below that is developed by a nonprofit organization, as well as waiving impact fees for accessory dwelling units that are not constructed with new single-family detached units. The County continues to utilize Payments-in-Lieu of Taxes (PILOTs) agreements as a financial incentive for developers building affordable rental housing.

**Zoning and opportunity.** Plan2040 identifies future land uses and assigns the number of acres planned for each respective land use designation. One of the policies articulated under Goal BE12 aims to:

- Increase the supply of affordable housing units throughout the County, especially in Communities of Opportunity, without further concentrating affordable units in areas of older housing stock and high concentrations of low to moderate-income households (Policy BE12.1).

An analysis for this report examined zones that allow multifamily housing to be developed by right with census tracts and their “opportunity” designation. For land that allows high density residential development by right (15 to 22 units per acre), 2,425 acres is assigned, or 1% of the entire county. If Mixed Use and Town Center land use designations are

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<sup>10</sup> Note that the zoning maps in this section were created before the bill was passed and therefore do not contain the supplemental housing types that the new bill will facilitate.



accounted for, an additional 4,933 acres allows for high density residential, or an additional 2.1% of the county.

Of the total acres that allow multifamily by right, 35% falls within a census tract designated as “High Opportunity,” and 13% Very High—for nearly half of the land. Another 26% is located in Moderate opportunity areas, followed by Low opportunity (21%), and Very Low opportunity (5%). In sum, half of the areas in the county that allow multifamily development by right are in high opportunity areas compared to 25% in low.

This distribution is similar for where Plan2040 designates future land uses. In future designated areas that allow “High Density Residential” uses, 38% is designated in Very High and High opportunity areas (24 census tracts); 24% is Moderate (15 census tracts); 32% Low (20 census tracts); and 6% Very Low (4 tracts).

**APFO.** In 2020, Anne Arundel County commissioned a workgroup to examine the County’s APFO as it relates to public schools, to gather and assess data, and to formulate recommendations toward achieving adequate school capacity throughout the public school system. The workgroup completed its work in spring 2023 and provided the following key findings:

- “There are misconceptions that construction of new multifamily dwellings will result in an influx of new students to that feeder system. The reality is more complicated. **New construction and an increase in the number of permits do not reflect a corresponding increase in student enrollment.**”
- “Total housing units in the County increased by 22% from 2001 to 2020, while total population increased by 18% over the period. In 2020, most residential units were single family detached (>60%), followed by single family attached (20%) and multifamily dwellings (17%). Rental units represented roughly 24% of the total housing units in 2020. **Overall, single family detached dwellings have generated the highest student yield, as compared to other dwelling types.**”
- “**Existing home turnover has been a significant driver of school utilization.** The volume of new residential building permits completed has been smaller than the amount of existing homes sales over the past two decades. Both existing home sales and new residential construction are contributing to increases in student enrollment.”
- **Comprehensive School redistricting scenarios** currently proposed for the first time in many years and to be done in two phases and fully completed in 2025, would have significant impacts on school utilization rates and **could eliminate many of the chronic school overcrowding of the past several years.**

The workgroup added that “the factors contributing to the affordable housing shortage are multiple and complex, including high land values, the cost of construction, and income disparities, and cannot be solely attributed to school closures alone. Nevertheless, the ongoing pattern of multiple school closures in the County is a constraining factor in the

supply of new housing units, which in turn impacts housing costs.” In this quote, “school closures” refers to school attendance zones where residential construction is halted (“closed” to development) due to school crowding, not to closures of the schools themselves.

In response to these findings, Anne Arundel County passed Bill [52-23](#), which made “affordable housing or workforce housing under Title 10, Article 18 of the code”<sup>11</sup> exempt from passing the adequacy of school facilities test. Housing for the elderly of moderate means is also exempt. However, residential development funded in part by low income tax credits must meet the conditions of [§17-5-207\(6\)\(e\)](#) to be considered exempt from the adequate school facilities test. Specifically, the development:

- Must have no more than 50 dwelling units;
- At the date of application for the award of the low income tax credits, all schools serving the project must be designated as “open” on the County’s school utilization chart; or
- At the time of testing for adequate school facilities, the school enrollment for each elementary and middle school is no more than 3% above the percentage of the State rated capacity set forth in 17-5-502(a)(4)(i) and the school enrollment for each high school is no more than 5% above the percentage of the State-rated capacity set forth in 17-5-502(a)(4)(ii); and
- Must be encumbered by recorded deed restrictions that the units be restricted to occupancy by eligible housing under this paragraph for at least 30 years and that at least 60% of rental units be occupied by a household with an income that does not exceed 60% of the median income adjusted for housing size for the Baltimore Primary Metropolitan Statistical Area, as defined and public annually by HUD.

**Recommendations for more inclusive environments.** The following recommendations<sup>12</sup> for Anne Arundel County related to zoning and land use include:

- *Implement the Plan2040 recommendations related to increasing the supply of affordable housing and allow for a variety of residential forms, densities and sizes.*
- *Consider revisiting the Essential Worker Housing Access Act or similar legislation to require or incentivize the development of affordable housing units for the county’s workforce as one solution to continue to increase workforce housing supply.*

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<sup>11</sup> [Bill No. 52-23. An Ordinance concerning Subdivision and Development—Adequate Public Facilities—Adequate School Facilities—Affordable Housing—Workforce Housing—School Utilization Chart.](#)

<sup>12</sup> Italicized recommendations are those that were recommended during the development of this report which have already been implemented by Anne Arundel County.

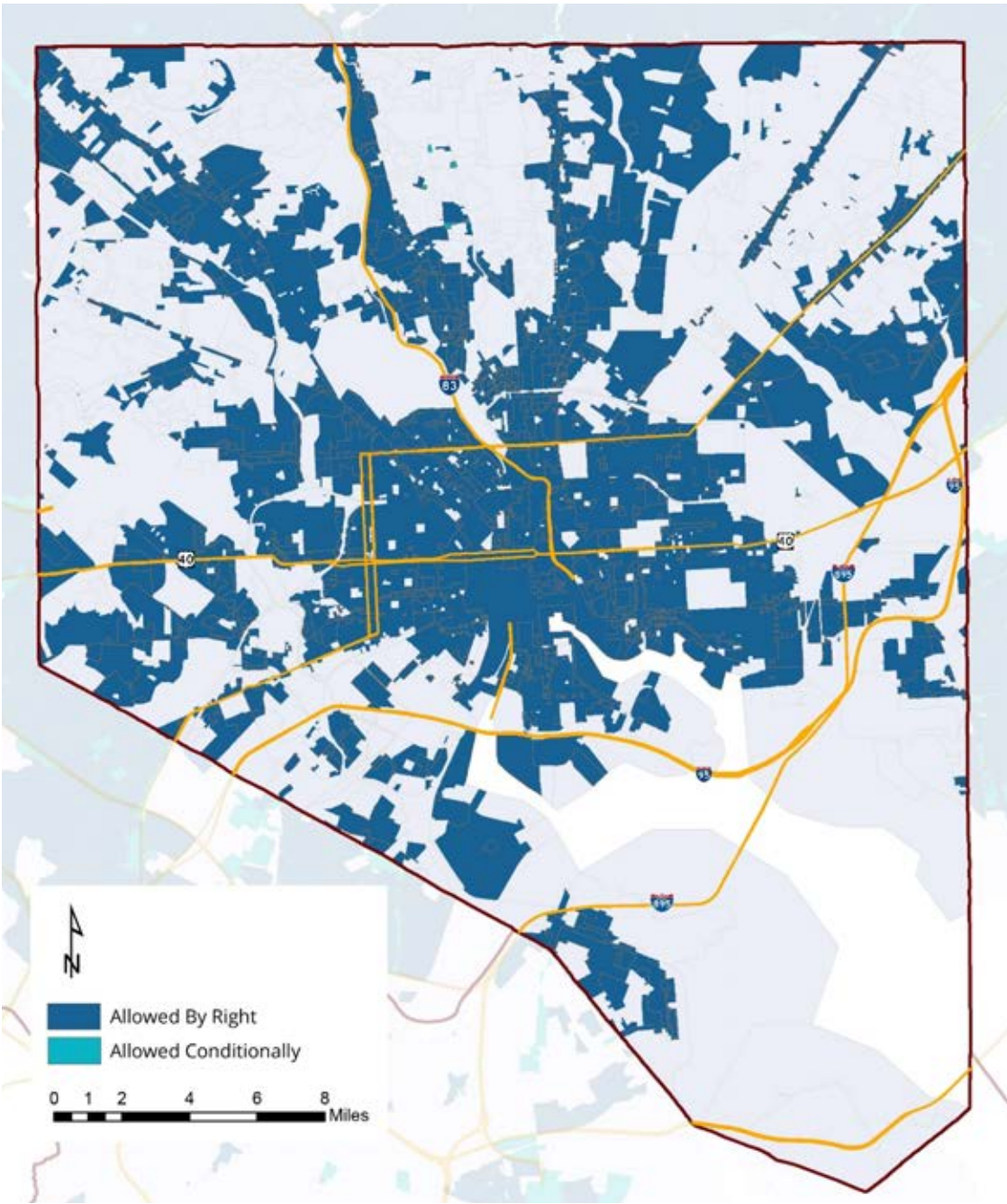
- Consider exempting all affordable housing types from APFO without additional conditions that can discourage development and make it more time consuming and costly, including LIHTC developments.

## **Baltimore City**

**Growth and building permit trends.** Between 1990 and 2009, Baltimore City averaged approximately the same number of single family and multifamily permits a year—192 single family permits and 200 multifamily unit permits—with approximately 4,000 building permits issued for multifamily housing and 3,830 permits for single family units. Since then, Baltimore City’s multifamily housing production has far outpaced its single family production. Between 2010 and 2018, 6,815 permits were issued for multifamily housing units, compared to 1,572 for single family units (yearly averages of 757 and 175 permits issued, respectively). Between 2019 and 2022, multifamily housing production boomed in Baltimore City, with approximately 4,800 multifamily units permitted compared to just 540 single-family units (yearly averages of 1,200 and 135 permits issued, respectively).

**Current zoning regulations.** The City of Baltimore last updated its zoning code in 2017, which allows for a variety of housing types and densities all throughout the city. Figures VIII-12 through VIII-14 show where different housing types are allowed by right and conditionally in the city. Multifamily housing of varying densities is allowed on over 40% of land in the city; moreover, high density multifamily housing (>15 units/acre) is allowed on nearly a quarter of land in Baltimore (23%). By right, detached single family housing is allowed on approximately half of the land in the city, followed by rowhomes (35%) and semidetached housing (33%).

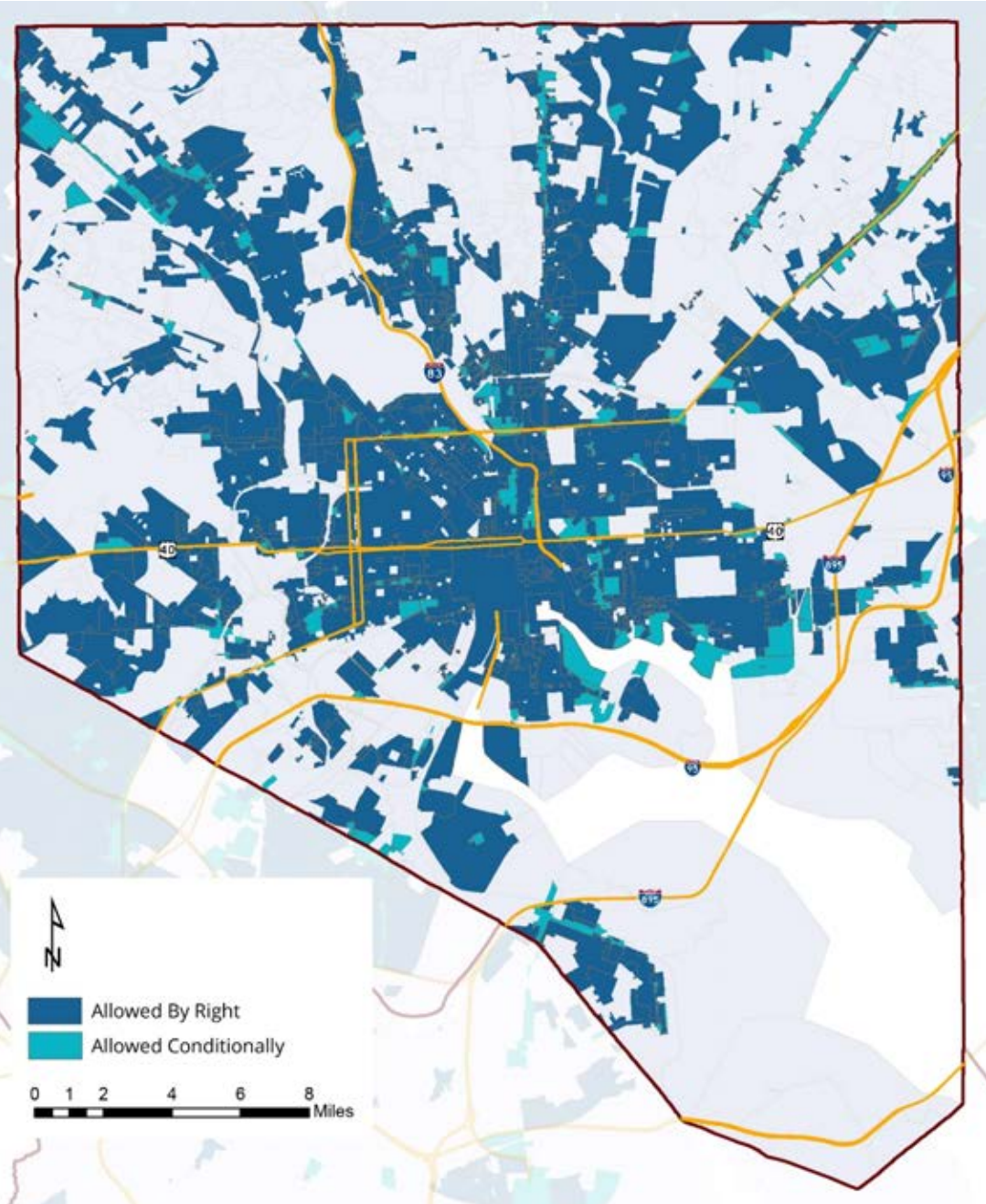
**Figure VIII-12. Multifamily Housing Allowed By Right and Conditionally, City of Baltimore**



Source: City of Baltimore and Root Policy Research.

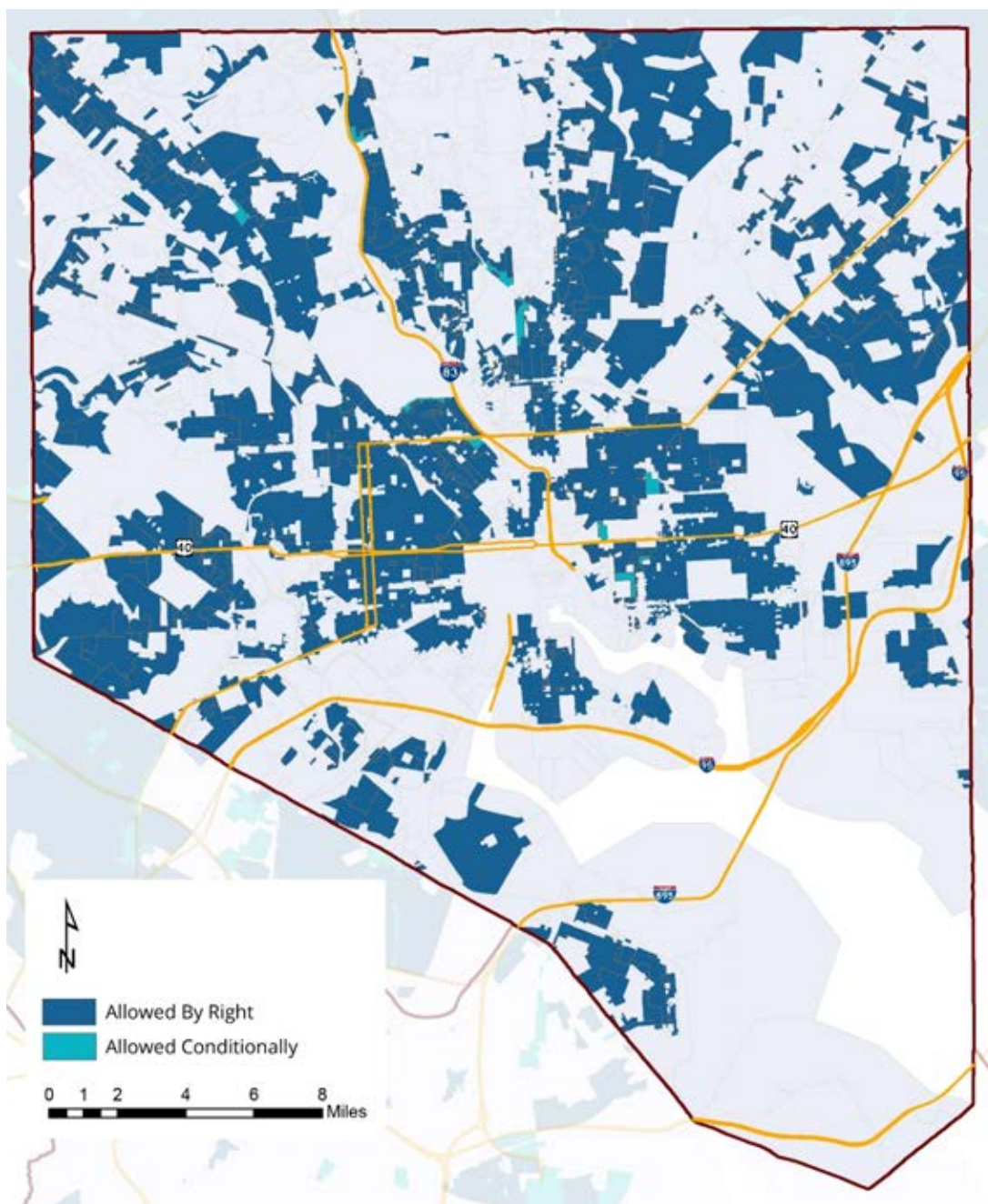


**Figure VIII-13. Rowhomes Allowed By Right and Conditionally, City of Baltimore**



Source: City of Baltimore and Root Policy Research.

**Figure VIII-14. Semidetached Homes Allowed By Right and Conditionally, City of Baltimore**



Source: City of Baltimore and Root Policy Research.

**Affordable housing efforts and incentives.** Baltimore's short-lived adoption of racial zoning in 1910, followed by Euclidean zoning in 1923 combined with the private use of racially restrictive covenants, and federal redlining starting in 1937 continues to have a negative influence on the housing, economic, education, and health outcomes of Baltimoreans, particularly those in predominantly Black neighborhoods. As noted in this report, it was these factors that not only blocked racial and ethnic integration but denied



minority residents the benefits of public and private investment. One way this lack of disinvestment continues to manifest today is the city's significant inventory of vacant land and parcels.

To address this issue, in December 2023, the mayor "...announced a 15-year, \$3 billion plan to redevelop the City's 37,000 vacant and dilapidated houses and 'solve [the] crisis once and for all.'"<sup>13</sup> Financing tools that will be used to implement the plan include non-contiguous tax increment financing bonds and reinstating the city's Industrial Development Authority. One of the strategies behind the plan is the sale of vacant property to various actors at reduced prices—\$3,000 per lot for a developer, \$1,000 for a nonprofit, and \$1 for a prospective homeowner or land trust.

Also in December 2023, the City Council passed an inclusionary housing law, which mandates that developers building market-rate developments of at least 20 units set aside at least 10% of their units for households at various AMI thresholds. Specifically:

- 5% of the units must be for households at or below 50% AMI;
- 5% of the units must be for households at or below 60% AMI; and
- In some instances, an additional 5% of units must be for households with income between 30% and 50% AMI.

To help offset the loss of revenue from these income-restricted units, the City provides a property tax credit that equals the actual lost rent for each calendar year.

In July 2024, the City announced that it would be developing the City's first-ever Comprehensive Housing Plan, which "...will seek to outline a long-term vision for Baltimore's approach to housing policy and provide an overarching road map to ensure the multitude of programs and policy plans for various agencies...are cohesively executed together."<sup>14</sup>

**Zoning and opportunity.** The analysis that looked at zones that allow multifamily housing to be developed by right with census tracts and their "opportunity" designation was not conducted for Baltimore City since most of the city allows multifamily development by right.

**Definition of family.** The 2012 AI found the city's definition of family as a barrier to housing choice for residents living in a group home setting. The definition restricts the number of unrelated people living together to 4, which is lower than what courts have found to be reasonable for group homes.

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<sup>13</sup> <https://baltimorebrew.com/2024/02/29/baltimore-hcd-proposes-to-sell-vacant-properties-for-1-under-certain-conditions/>

<sup>14</sup> <https://mayor.baltimorecity.gov/news/press-releases/2024-07-17-mayor-scott-dhcd-announces-effort-establish-citys-first-ever>

“Family” is defined in the code as one of the following, together with customary household helpers:

- “an individual;
- “2 or more people related by blood, marriage, adoption, or State-supervised foster care, living together as a single housekeeping unit in a dwelling unit; or
- a group of not more than 4 people, who need not be related, living together as a single housekeeping unit in a dwelling unit.”

While the 2020 AI identified that this definition was carried forward in the City’s comprehensive zoning code update in 2017, the City has implemented a Reasonable Accommodation policy that ensures persons with disabilities have equal opportunities to live in the dwellings of their choice. Specifically, the Office of the Zoning Administrator uses this policy and its procedures to evaluate requests by group homes or supportive homes to waive the Baltimore City Zoning Code’s definition of “family” (4 or fewer unrelated people) in order to locate single-family dwellings and be in compliance with the Fair Housing Act.

Additionally, the 2012 AI identified that no definition for “group home” existed in the zoning code. However, the report found that the “most applicable definition for this type of land use was a **licensed residential care facility**, referring to a state-licensed facility providing 24-hour medical or non-medical care for persons in need of personal services, supervision or assistance essential for sustaining the activities of daily living, or for the protection of the individual.”<sup>15</sup>

The City has updated the definition term to **residential care facility**, as well as a slight revision to the definition. It now states that a residential care facility means “a group care or similar facility for the 24-hour medical or non-medical care for persons in need of personal services, supervision, or assistance essential to sustain activities of daily living, or to protect the individual.” The City allows residential care facilities by right in all residential districts, several commercial districts, office-residential districts, a couple industrial districts, and other mixed-use and special use districts.

Additionally, while not specified in the definition, some of the City’s permitted and conditional use tables (e.g., Table 9-301, Table 10-301) specify that residential care facilities are permitted by right when the facility has 16 or fewer residents; if there are more than 17 residents, the use is considered conditional and requires approval by the Board of Municipal and Zoning Appeals.

## Baltimore County

**Growth and building permit trends.** Over the last three decades, housing production has declined in Baltimore County. Between 1990 and 2009, Baltimore County issued

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<sup>15</sup> [2012 Regional AI, City of Baltimore, page 94](#)

approximately 39,000 permits for single family units and 15,600 permits for multifamily units—an average of 1,946 and 781 permits annually (2,727 total), respectively. During this time period, 2.5 single family permits were issued for every one permit for multifamily housing.

Between 2010 and 2018, the County issued approximately 6,850 permits for single family units and 3,800 for multifamily units, for an annual average of 760 and 418 permits issued (1,178 total), respectively. The ratio of single family permits to multifamily permits decreased during this time period, with 1.8 single family permits issued for every one multifamily permit. Between 2019 and 2022, the County issued 2,717 single family permits and 1,468 multifamily permits. Similar to the 2010-2018 period, the County has issued approximately 1.8 permits for single family units for every one multifamily permit.

**Current zoning regulations.** The primary findings from the 2012 AI concluded that multifamily development was allowed only in areas where affordable housing was already concentrated. The 2020 AI identified the County's zoning regulations, with respect to multifamily housing, as "broad and flexible" and found that many areas where multifamily housing could be built were subject to the judgment of the administrative hearing officer.

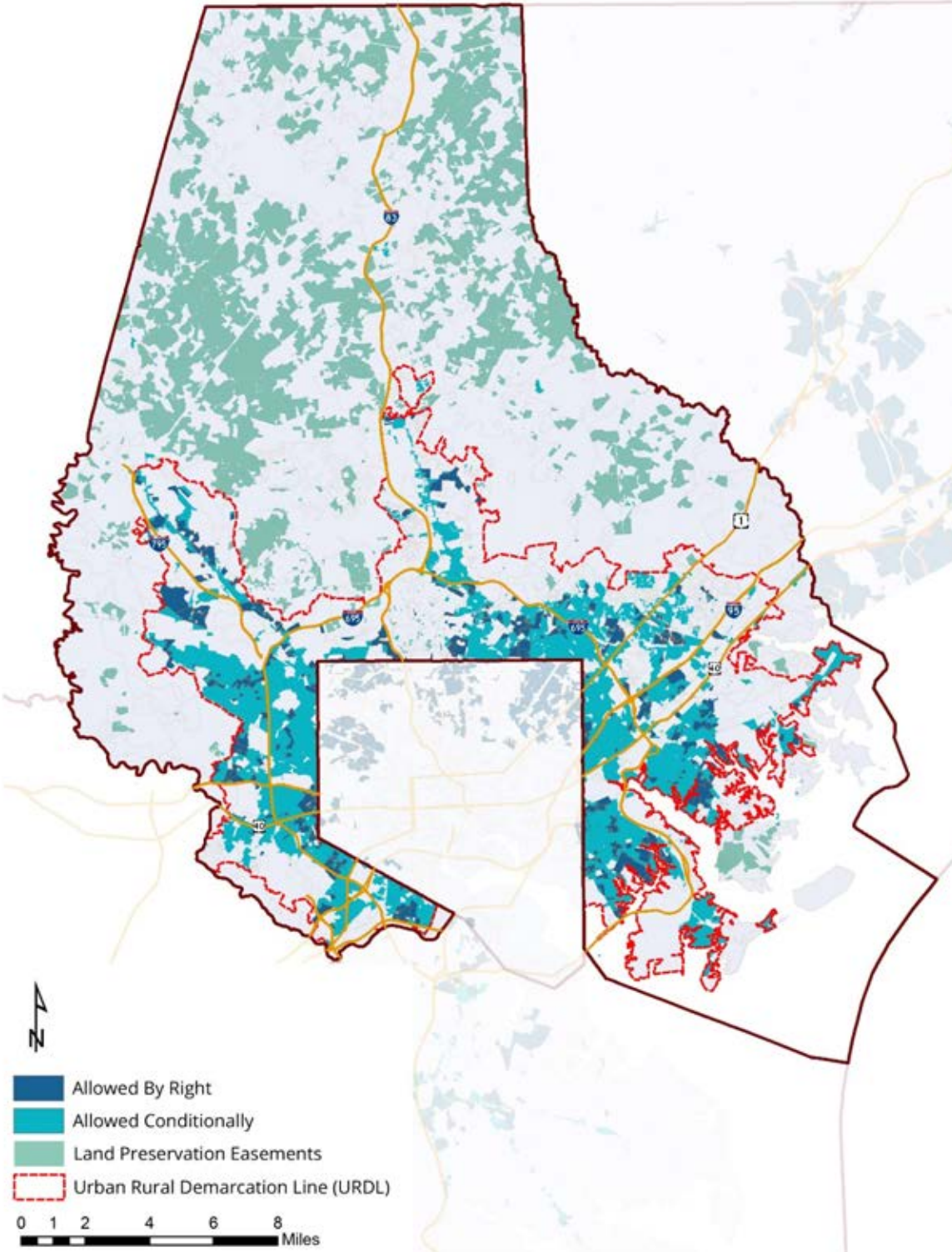
Figure VIII-15 shows where multifamily housing is allowed to be built in Baltimore County. By right, multifamily housing is allowed in the DR10.5 and DR16 residential zones, as well as the OR2 office residential zone and the RAE 1 and RAE 2 residential apartment elevator zones. By acreage, these zones make up 3.2% of land within the county. Additionally, subject to compatibility findings by the Hearing Officer, multifamily housing is allowed in the DR5.5 residential zone, which accounts for approximately 8.4% of the land in the county, as well as several businesses districts and two office residential districts.

Multifamily development of more than 20 units per acres is only allowed in the RAE 1 and RAE 2 zones, which are a tiny portion of the County's land. Planned unit developments are also allowed in Baltimore County, subject to compatibility findings by the Hearing Officer, but those are dependent on passage of a special ordinance for that site.

Figure VIII-16 shows where semidetached and duplex dwellings are allowed in Baltimore County. By right, they are allowed in all residential zones, which make up approximately 25% of all land in the county. Additionally, these housing types are allowed conditionally in three business districts, which account for 2.4% of the land in the county.

Single family detached dwellings, the only housing type allowed in resource conservation zones, are allowed by right on 92% of the land in Baltimore County.

**Figure VIII-15. Multifamily Allowed By Right and Conditionally, Baltimore County**

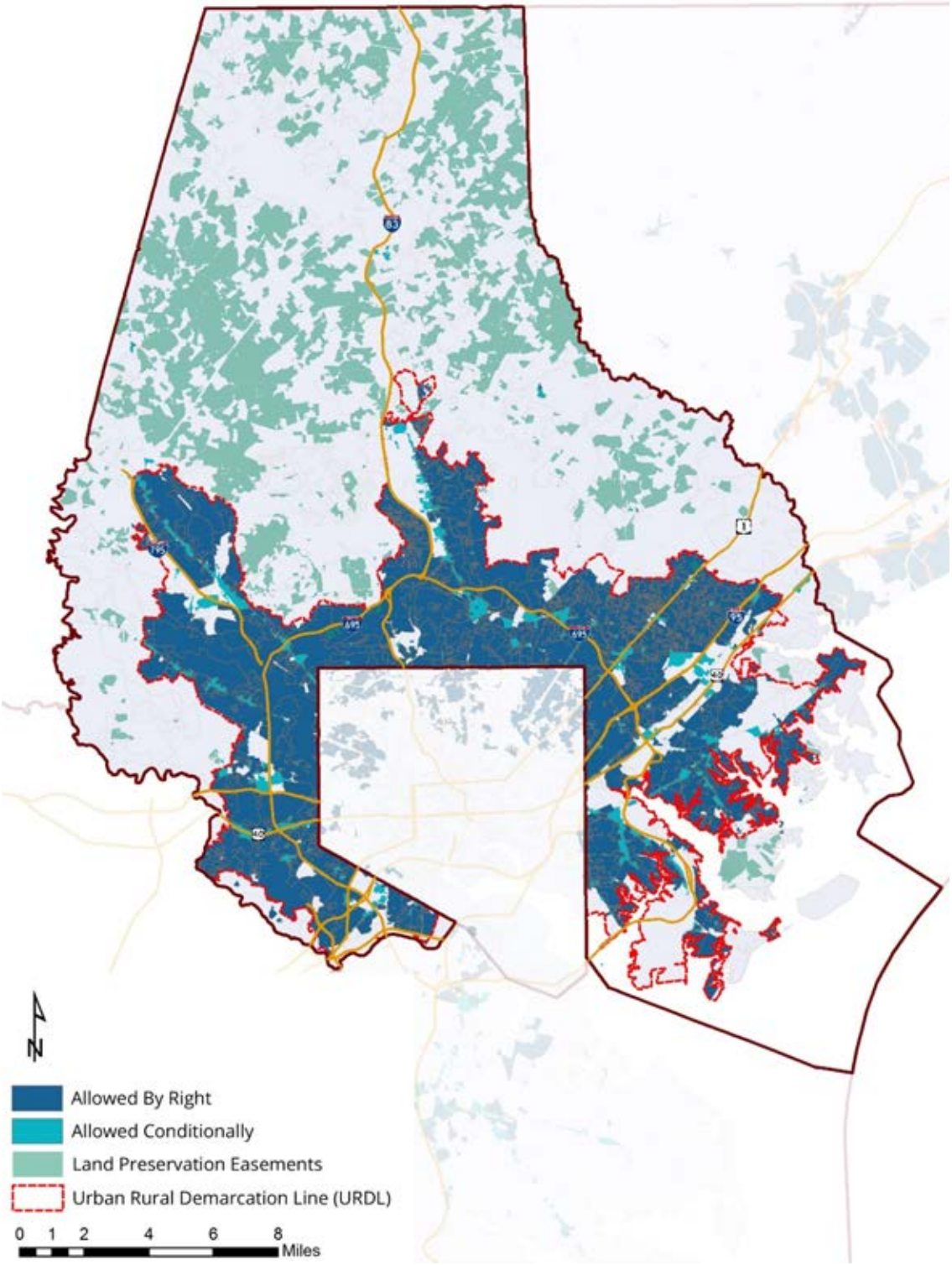


Note: Unit totals from improved Commercial and Industrial Use parcels with housing

Source: Maryland State Department of Assessments and Taxation and Baltimore County.



**Figure VIII-16. Duplexes and Semidetached Housing Allowed By Right and Conditionally, Baltimore County**



Note: Unit totals from improved Commercial and Industrial Use parcels with housing

Source: Maryland State Department of Assessments and Taxation and Baltimore County.

**Zoning as a barrier to housing production.** In spring 2021, the Baltimore County Executive appointed an Affordable Housing Workgroup to analyze housing affordability challenges and opportunities in Baltimore County. One of the three established subcommittees, *Zoning and Infrastructure*, found that “the County must be open to more flexible and thoughtful design and zoning policies in order to facilitate the creation of innovative and varied housing types suited to the diverse needs of County residents.”<sup>16</sup>

The subcommittee went on to provide more specific recommendations related to zoning:

- Adopt Inclusionary Zoning practices as a critical component of the County’s affordable housing strategy (Recommendation 6).
- Allow multifamily developments in select commercial and industrial zones (Recommendation 7).
- Allow affordable housing developments by right (including multifamily) in all residential districts in Opportunity Areas as defined in the 2020 Analysis of Impediments to Fair Housing Choice in the Baltimore Region.
- Eliminate the lowest-density residential zoning classifications within the Urban-Rural Demarcation Line (URDL), DR-1 and DR-2.

In January 2024, Baltimore County passed *Master Plan 2030*, which informs and guides the future development and growth of the county. The Plan’s Housing goal is to “provide quality mixed-income housing options to meet the needs of a diverse population and strengthen neighborhoods.” Zoning is identified as a factor in limiting housing choice—the Plan includes the following actions to address this issue:

- “Establish zoning practices that removes (sic?) barriers and supports (sic?) mixed-use and mixed-income development for a wide-range of housing options. Allow housing development in certain commercial zones in Affordable Housing Opportunity Areas (**Goal 2, Action 2**).
- “Create new and adjust existing overlay districts with implementation tools and incentives to encourage walkable, mixed-use development in and near transit stations by utilizing a Smart Growth framework (**Goal 1, Action 3**).

**Zoning and opportunity.** An analysis for this report looked at zones that allow multifamily housing to be developed by right with census tracts and their “opportunity” designation.

Approximately 12,400 acres of land allow multifamily housing development by right in Baltimore County—two residential zones (DR 10.5 and DR16), one office residential zone (OR2), and two residential apartment elevator zones (RAE 1 and RAE2). Collectively, these areas account for 3% of the land in Baltimore County. Of the zones that allow multifamily

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<sup>16</sup>



by right, 40% of the land is located within a census tract designated as “Low Opportunity.” Another 26% is located in Moderate opportunity areas and 21% is in Very Low opportunity areas. Just 15% is in High and Very High opportunity areas (10% High and 5% Very High).

**APFO.** In August 2020, the Baltimore County Council passed Resolution 76-20, which created the Baltimore County Adequate Public Facilities Ordinance (APFO) Task Force to “study and evaluate methods to make improvements to the Baltimore County APFO as it relates to development and the need for adequate infrastructure, particularly public school facilities.”<sup>17</sup> The Task Force published a report of their findings and recommendations in December 2020. Some of the recommendations included revisions on timing of the APFO school test, elimination of exception opportunities, and adjustments to the County’s overcrowding utilization rate.<sup>18</sup>

In June 2024, the Baltimore County Council passed Bill 31-24, which amends the County’s Adequate Public Facilities Ordinance regarding overcrowded school districts. The new ordinance requires developers who have already obtained approvals for their development plans to submit school capacity approval certificates to a newly created committee charged with reviewing the development’s probable impact on overcrowding. If the developer fails to meet the specified criteria for the certificate, the development is put on a waitlist for future reassessment. If the approved development remains on the waitlist for four years, it is automatically issued a school capacity approval certificate. Developers who want to avoid the school capacity adequate test can “...present potential mitigation opportunities to the committee, including the submission of plans and funding for the construction of additional capacity in the relevant school districts...and plans for the redistricting of students in the approved development to adjacent school districts maintaining adequate capacity.”<sup>19</sup>

While several residential housing types are exempt from the County’s school capacity adequacy test, including 55+ residential developments and emergency or transitional housing facilities, affordable housing is not exempt from the APFO.

However, in August 2024, the Baltimore County Council passed a bill that allows affordable housing units to be built in over-capacity districts. Because of a conciliation and voluntary compliance agreement between Baltimore County and the U.S. Department of Housing and Urban Development in 2016, the County is required to build 1,000 affordable rental housing “hard units”—defined as “affordable rental housing resulting from new construction, substantial rehabilitation, acquisition, or existing housing stock”—by 2027. Affordable housing developments that are exempt from the adequate school facilities test are determined by the County Attorney, in consultation with the Director of the

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<sup>17</sup> <https://countycouncil.baltimorecountymd.gov/countycouncil/boards%20and%20commissions/apfotaskforce.html>

<sup>18</sup> [Report of the Baltimore County School APFO Task Force, December 31, 2020.](#)

<sup>19</sup> <https://www.barley.com/new-baltimore-county-ordinance-seeks-to-ease-school-overcrowding-restricts-residential-development/>

Department of Housing and Community Development. The County Attorney must “[issue] a written opinion prior to development approval that the proposed development plan or a portion of the proposed development plan is necessary to meet the county’s affordable housing requirements under the conciliation and voluntary compliance agreement, effective March 9, 2016, between the County and the U.S. Department of Housing and Urban Development.”<sup>20</sup>

**Other zoning issues.** The 2020 AI recommended that the County update the definition of “family” in the zoning code to clarify what “lawful” intends to regulate and what a “single house keeping unit” means; upon review for this report, the definition has not been updated.

Additionally, there is no definition for “group home” in the County’s zoning code. However, the most applicable definition for this type of use is **community care center**, which is defined as “a small-scale facility, sponsored or operated by a private charitable organization or by a public agency...[that provides] housing, counseling, supervision or rehabilitation of alcoholics or drug abusers or of physically or mentally (including emotionally) handicapped or abused individuals who are not subject to incarceration or in need of hospitalization.”

Community care centers are considered special exception uses in all residential zones in Baltimore County; however, other residential uses are permitted by right in these zones. Additionally, the County code articulates that the special exception designation for community care centers last five years, and that owners of the facility must apply for a continuation of the special exception designation three months prior to the expiration of the special exception. These regulations—need for a special exemption for an initial permit and requirement to apply for a continuation—could be found to be in violation of Fair Housing Act if the result in the denial of group homes.

**Recommendations for more inclusive environments.** The following recommendations for Baltimore County related to zoning and land use include:

- Implement the recommendations from the 2021 Zoning and Infrastructure Subcommittee of the Affordable Housing Workgroup, which recommended adopting inclusionary zoning practices, allowing affordable housing developments by right in all residential districts in opportunity areas, and eliminating the DR-1 and DR-2 zoning classifications within the URDL.
- Implement the Master Plan 2030 zoning-related actions to remove barriers to providing a range of housing options.

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<sup>20</sup> [County Council of Baltimore County, Maryland, Legislative Session 2024, Bill No. 50-24, An Act concerning Adequate Public Facilities – Overcrowded School Districts – Clarifying Legislation, page 17.](#)

- Clarify the definition of “family” in the zoning code. A best practice is to not define “family” through the zoning code to better facilitate inclusive housing arrangements and to regulate household size through occupancy restrictions to prevent overcrowding.
- Allow compatible, community-based group homes by right in at least one residential district—preferably both single family detached and multifamily districts to allow a variety of home types and avoid conflicts with state law—to facilitate inclusive shared living arrangement for residents with special needs, including persons living with disabilities and persons in recovery.
- Expand incentives for affordable housing development through fast-track development, fee waivers, and exempting affordable housing for families from APFO.

## Harford County

**Growth and building permit trends.** Between 1990 and 2009, Harford County permitted approximately 31,000 single family units compared to approximately 4,500 multifamily units—nearly 7 single family units permitted for every one multifamily unit.

Since 2010, the rate of housing development has decreased. Between 2010 and 2018, Harford County permitted 623 single family units and 225 multifamily units. Over the last three years, the County permitted 623 single family units and 486 multifamily units. While housing growth has slowed, multifamily housing has accounted for a much more significant share of the county's residential development over the last decade.

**Current zoning regulations.** The 2020 AI found that zones that permitted mid-rise and high-rise apartments were limited. The report went on to say that “Apartments, especially low-rise units, can be carefully integrated into single family settings (R3 and even R2) with careful site design and planning. Although these uses appear to be more broadly allowed through Planned Residential Development, special development regulations govern these uses, meaning that the application could vary.”

A review for this report found that zoning regulations for these housing types have remained largely the same. Figure VIII-17 shows where multifamily housing is allowed in Harford County. Mid-rise apartments<sup>21</sup> are only allowed in the R3 zone if developed through a planned residential development. Mid-rise and high-rise apartments<sup>22</sup> are allowed in the R4 zone through the conventional development with open space and planned residential development processes. Collectively, R3 and R4 zones make up 4% of land within the county. Lower density multifamily housing types, such as multiplexes and garden apartments, are allowed in more zones—multiplexes are allowed in the R2 and Residential Office (RO) zone, while garden apartments are allowed in the RO zone.

Additionally, housing for the elderly is permitted in the R2, R3, and R4 zones with a minimum lot size of 4 acres. Continuing care retirement communities (CCRC) are permitted in all residential districts but must be located on a minimum lot size of 20 acres.

Figure VIII-18 shows where different types of attached housing are allowed in the county. Overall, most of the areas where it can be built in the county allow for at least five different types of attached housing.

While a review of regulations found that areas zoned for multifamily housing are relatively limited in Harford County, County staff shared that the development envelope of where growth is directed in the county is nearing full “build out.” According to the county's 2023

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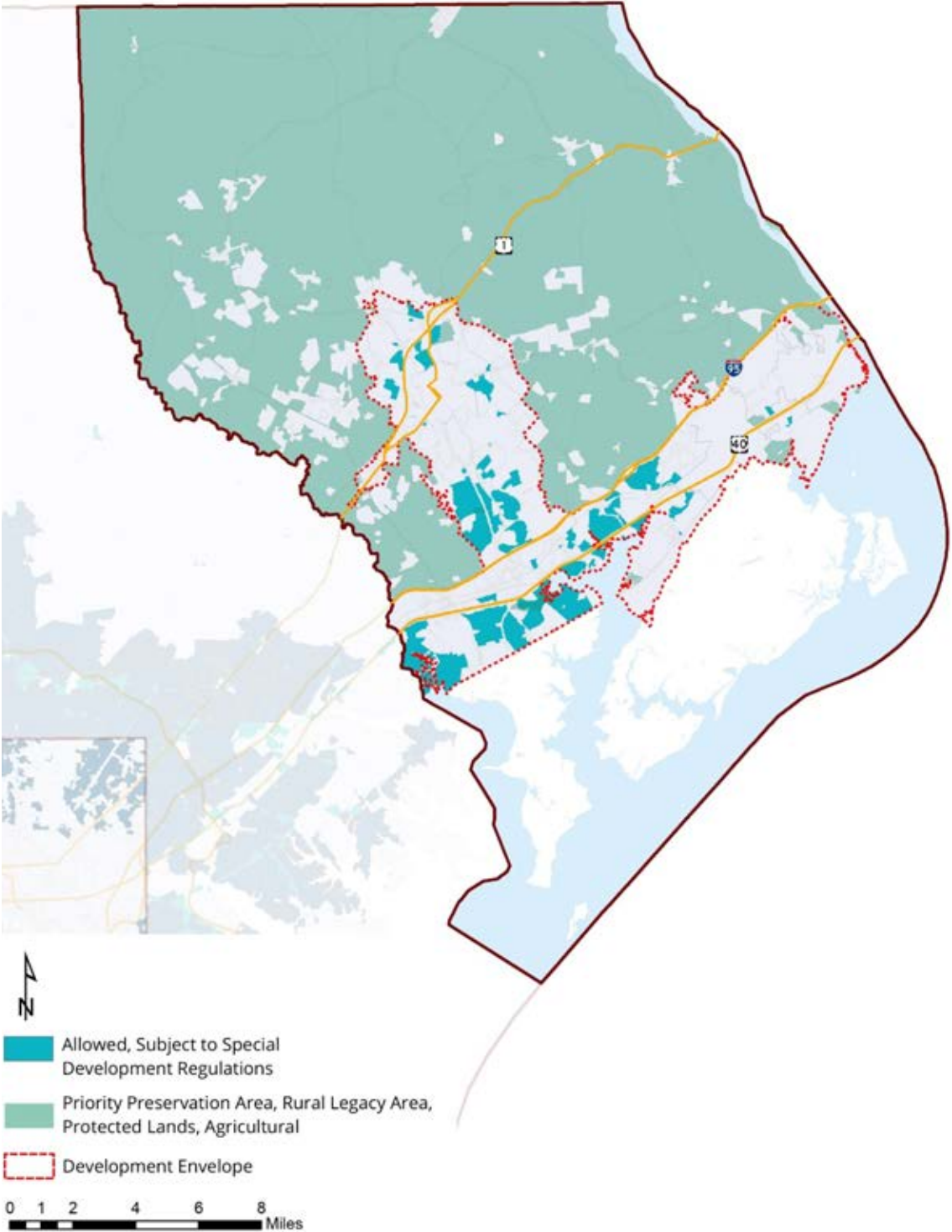
<sup>21</sup> Harford County defines mid-rise apartments as “a building containing 8 or more dwelling units off a common entry with either 4 or 5 stories.”

<sup>22</sup> Harford County defines high-rise apartments as “a building containing 8 or more dwelling units, containing 6 stories, with a common entry.”

Annual Growth Report, the Department of Planning and Zoning reported that related to total residential land capacity in the county's development envelope, there is capacity for an additional 13,084 units to be built inside the envelope. Additionally, staff articulated that most of the remaining growth opportunities are infill opportunities with significant environmental constraints. They added that the passage of the 2023 Forest Preservation and Retention Act will make it more difficult for development to occur throughout the state.

The County continues to implement its Starter Home Housing Bonus, which allows a 20% increase in the maximum number of dwelling units in a permitted area if 10% of the total dwelling units of the qualifying project are rented or sold to low- or moderate-income households.

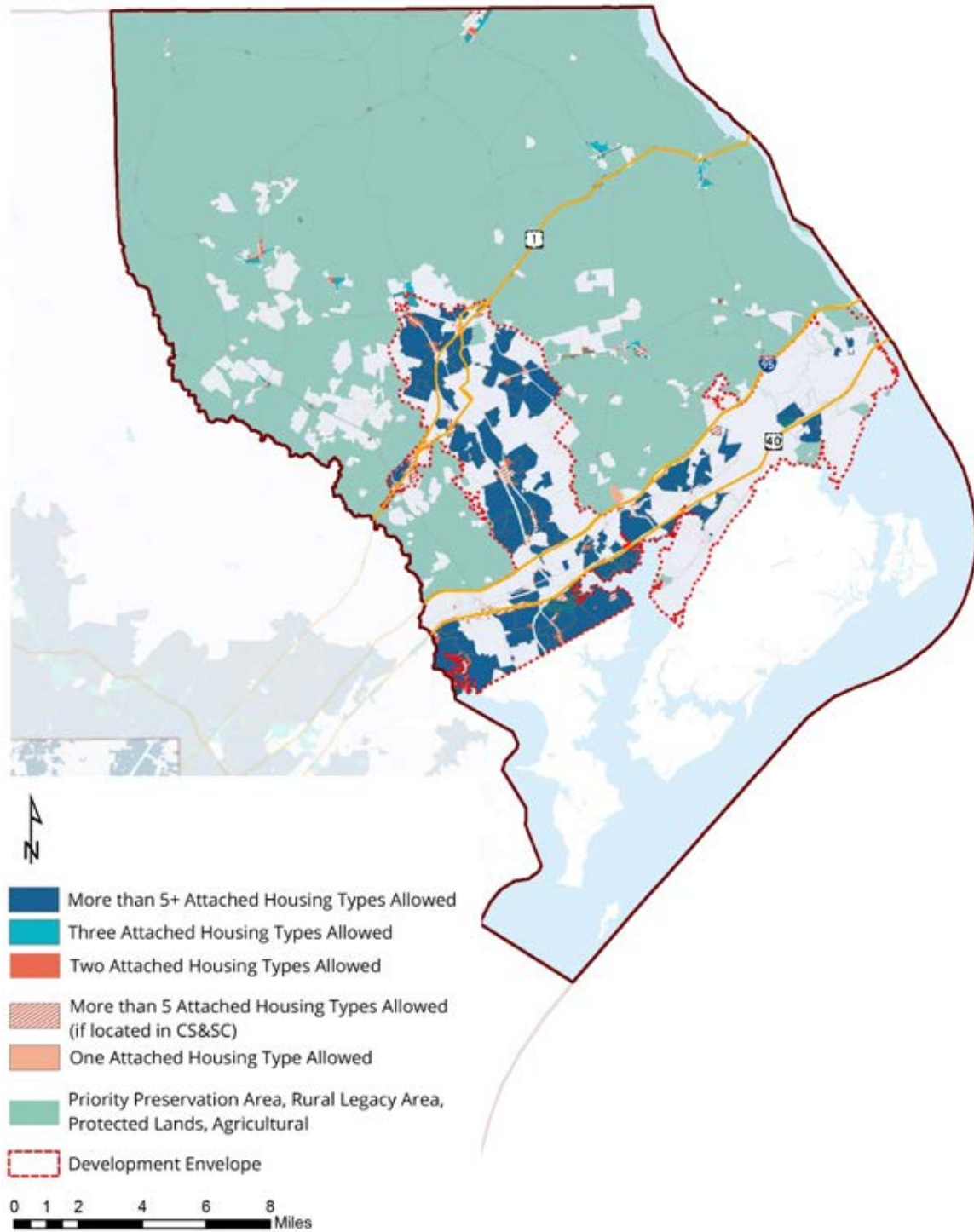
**Figure VIII-17.**  
**Multifamily Allowed By Right and Conditionally, Harford County**



Note: Unit totals from improved Commercial and Industrial Use parcels with housing  
Source: Maryland State Department of Assessments and Taxation and Harford County.



**Figure VIII-18.**  
**Attached Housing Allowed by Right, Harford County**



Note: Unit totals from improved Commercial and Industrial Use parcels with housing  
Source: Maryland State Department of Assessments and Taxation and Harford County.

**Zoning and opportunity.** An analysis for this report looked at zones that allow multifamily housing to be developed by right with census tracts and their “opportunity” designation.

Approximately 9,630 acres of land are zoned R3 and R4 in Harford County, where mid-rise and high-rise apartments are allowed to be built. These zones account for approximately 4% of the land in the county. The analysis found that collectively, over half of the land (51%) designated for mid-rise and high-rise apartments falls within a census tract designated as “Moderate Opportunity.” The next greatest amount of land where these housing types can be built are located in “Low” opportunity areas (27%), followed by “High” opportunity (15%) and “Very High” opportunity (7%).

**APFO.** Harford County’s 2023 Annual Growth Report articulates that “under current law, preliminary plans for subdivisions of greater than five lots cannot be approved in school districts where the full-time capacity exceeds, or is projected to exceed, 110 percent of the capacity within three years.”<sup>23</sup> The report found that 30 of the 33 elementary schools met adequacy standards while all middle and high schools met adequacy standards. Major subdivisions in the Homestead/Wakefield, Havre de Grace, and Hillsdale Elementary school attendance areas will not be approved during the 2023-2026 timeframe and will be placed on a waitlist until capacity becomes available.

Related to APFO and residential development, only housing for the elderly and continuing care retirement communities (CCRC) are exempt from testing for adequate school facility capacity. Currently, Harford County is preparing an Adequate Public Facilities Study report to identify whether the ordinance needs modifications or adjustments, with January 2025 as the targeted timeframe for a newly adopted APFO ordinance.<sup>24</sup>

**Group homes.** Harford County defines “group home for sheltered care” as “a home for the sheltered care of more than eight unrelated persons with special needs, which, in addition to providing food and shelter, may also provide some combination of personal care, social or counseling services and transportation.”

Group homes are considered special exception uses in all residential zones, as well as the Agricultural (AG) and Village Residential (VR) zones. They are permitted by right in the B3 General Business District, Commercial Industrial District, and General Industrial District. Group homes should be allowed by right in at least one residential zone by right to avoid conflict with the Federal Fair Housing Act.

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<sup>23</sup> [2023 Annual Growth Report, Harford County Government Department of Planning and Zoning](#)

<sup>24</sup> [Harford County Adequate Public Facility Board Meeting, June 5, 2024 Meeting Minutes](#)

Additionally, the 2020 AI noted that the County should consider reducing the parking requirements for group homes, which are more onerous than parking requirements for assisted living facilities. The report articulated that:

*This requirement raises the costs of group home construction and favors construction of assisted living and nursing facilities, which could create a shortage of group homes and settings that are often more appropriate for persons with special needs (and drive persons with special needs into more costly assisted living and nursing homes).*

This report found that parking requirements have remained unchanged since the last analysis and should be further reviewed and analyzed by County staff.

**Recommendations for more inclusive environments.** The following recommendations for Harford County related to zoning and land use include:

- Understanding that capacity is limited in the county's development envelope, consider expanding zoning districts that allow more attached housing types by right in single family settings.
- Group homes need to be allowed in at least one residential zone district by right—preferably both low density and multifamily districts to accommodate a variety of group home types—to facilitate inclusive shared living arrangement for residents with special needs, including persons living with disabilities and persons in recovery. Not allowing this use by right in at least one residential district could conflict with the Federal Fair Housing Act. The county's regulations discuss larger (8+ residents) group homes but it is unclear if small (fewer than 8 residents) group homes are allowed by right in residential districts.
- Embrace “dynamic zoning” best practices with respect to parking, to reduce development costs and embrace changing transportation alternatives (e.g., ride share services, non-vehicular transportation). Areas where parking is already available, such as large surface parking lots that are primarily occupied during the day, could be shared with attached-housing and even multifamily communities, making better use of land and better aligning with conservation goals.
- Expand incentives for affordable housing development through fast-track development and fee waivers. As the County looks to update its APFO in early 2025, consider exempting affordable housing (both family and senior) from APFO.

## Howard County

**Growth and building permit trends.** Between 1990 and 2009, Howard County approved approximately 28,500 building permits for single family housing and 6,700 building permits for multifamily housing—more than 4 single family permits issued for every one multifamily housing permit. Similar to other jurisdictions, housing growth has slowed since 2010; however, multifamily housing has accounted for a larger proportion of building permits. Between 2010 and 2018, the County approved 5,600 permits for single

family housing and 2,000 permits for multifamily housing. Over the last three years, of the approximately 4,400 building permits issued in Howard County, 44% have been for multifamily housing.

**Current zoning regulations.** Figure VIII-19 shows where multifamily housing/apartments are allowed in the county. Apartments are allowed by right in four residential districts: R-SA-8 (Residential Single Attached), R-A-15 (Residential Apartments), R-APT (Residential Apartments), and R-VH (Residential Village Housing). Collectively, these zones cover 1.4% of the land in the county and are relatively distributed throughout the planned service area boundary.

Figure VIII-20 shows where single family attached and semidetached housing are allowed in Howard County. Single family attached housing is allowed on just 9% of the county's land. Similar to multifamily housing, semidetached housing is allowed on roughly 2% of land in Howard County.

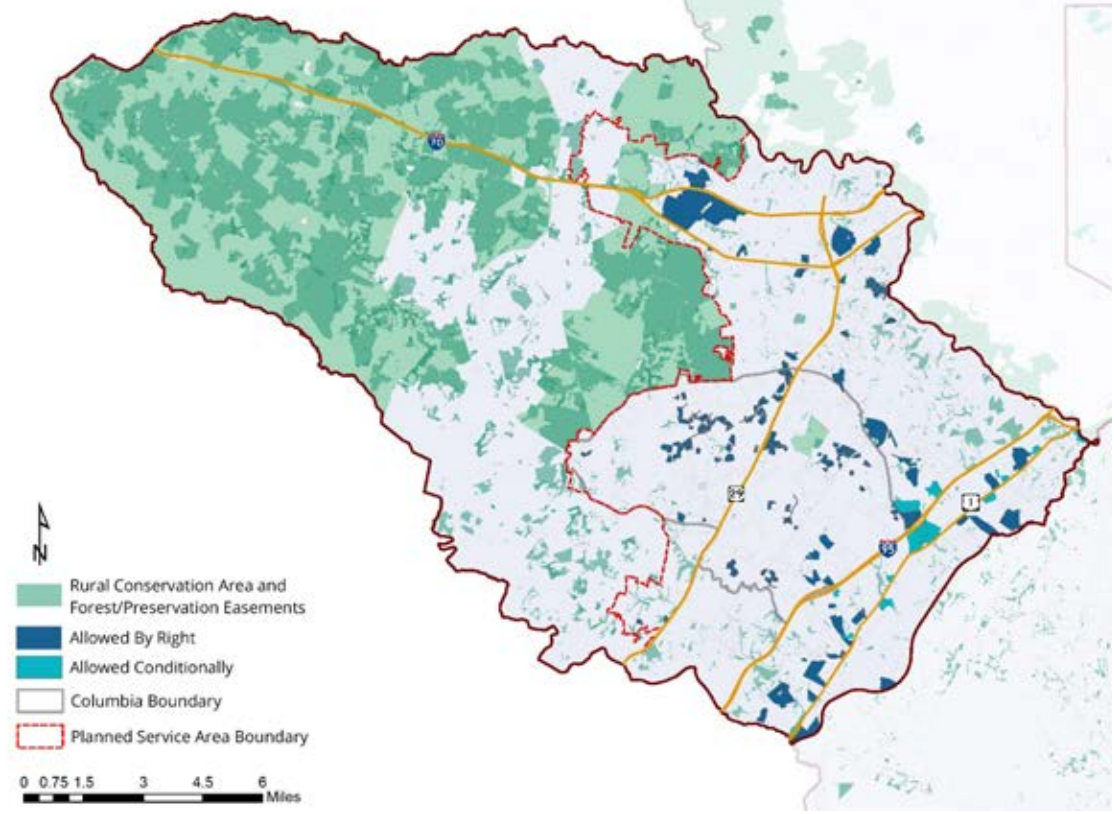
Comparatively, not including Columbia, which has unusual zoning that does not tie development capacity to particular locations, zones where single-family detached housing is allowed by right make up 83% of the land in Howard County. However, due to forest conservation and preservation easements,<sup>25</sup> single family detached housing cannot be built in all areas where zoning allows it. Nonetheless, single-family detached housing is allowed to be built on 57% of the land in Howard County.<sup>26</sup> Additionally, 10% of the land even within Columbia boundaries is currently dedicated to low-density, single-family housing.

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<sup>25</sup> These easements make up approximately 42,000 acres in Howard County, just over 25% of all land in Howard County.

<sup>26</sup> Calculations made based on Howard County's Land Use shapefile.

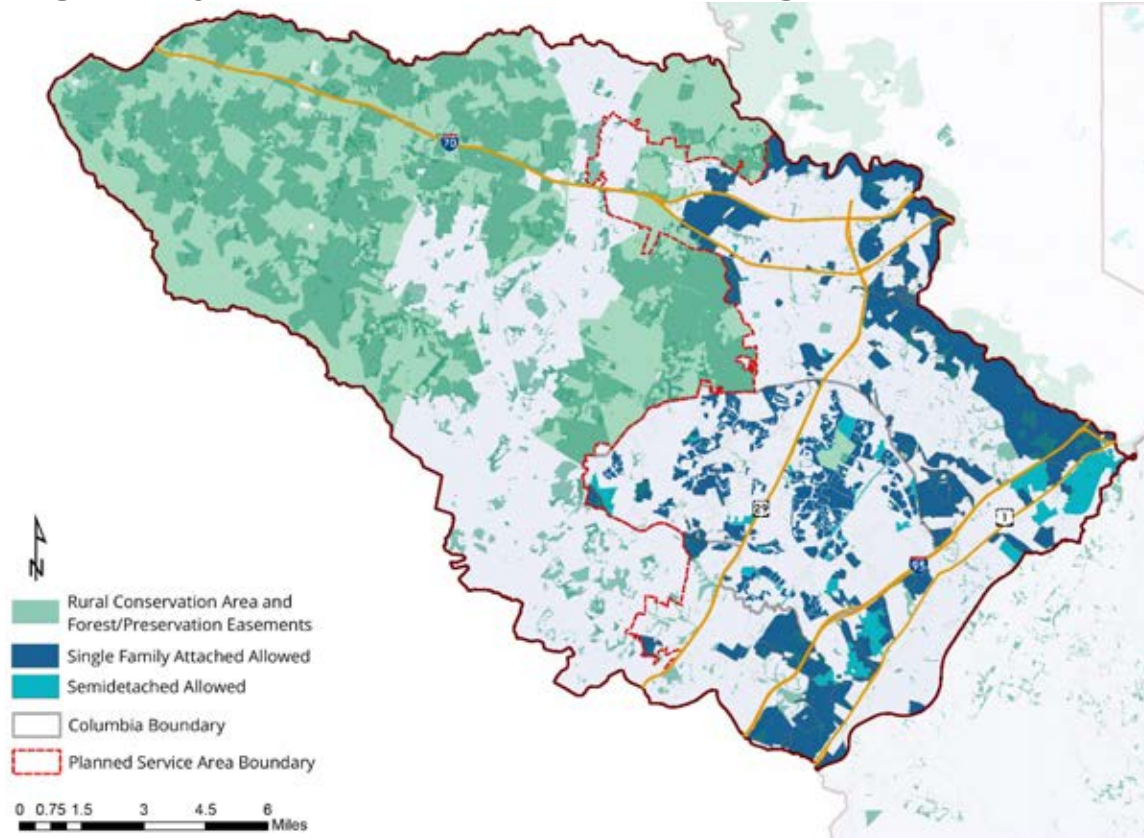
**Figure VIII-19.**  
**Multifamily (Apartments) Housing Allowed By Right and Conditionally,**  
**Howard County**



Source: Howard County and Root Policy Research.



**Figure VIII-20.**  
**Single Family Attached and Semidetached Housing Allowed, Howard County**



Note: Single Family Attached and Medium Density Residential land uses are shown within the Columbia boundary.

Source: Howard County and Root Policy Research.



**Zoning as a barrier to housing production.** In 2021, Howard County adopted its Housing Opportunities Master Plan, which assesses housing programs and policies throughout the county and identifies ways to create and preserve housing opportunities for residents of all income levels. Three land use, planning, and zoning challenges were highlighted in the plan:

- Housing supply has not kept up with housing demand;
- A lack of affordable housing throughout the County inhibits racial and socioeconomic integration; and
- New development today is less diverse than the housing inventory overall.

The overarching recommendation to address these challenges articulated in the plan is to “revise land use, planning, and zoning regulations to improve the availability, accessibility, affordability, and diversity of housing.” Specific recommendations included:

- Use land use policy and provide incentives to produce income-restricted housing units;
- Enable more equitable growth throughout the County through changes to zoning regulations and land use plans;
- Facilitate development of lower-cost housing typologies;
- Remove zoning barriers to mixed-use neighborhoods and developments; and
- Promote efficient processes for approving development.

The county’s updated general plan, HoCo by Design, also identifies zoning as a barrier to offering a diversity of housing choices. In the Plan’s Dynamic Neighborhoods chapter (Chapter 6), one of the policies states: “Increase opportunities for missing middle housing through the creation and use of zoning tools and incentives.” Implementing actions listed to achieve this policy include exploring whether to allow a greater diversity of housing types (e.g., duplexes, multiplexes) in more residential and mixed-use zoning districts, expanding the types of housing allowed, and providing more zoning tools and incentives to create missing middle housing.

**Zoning and opportunity.** An analysis for this report looked at land uses<sup>27</sup> that are designated for multifamily housing development with census tracts and their “opportunity” designation. Approximately 1,800 acres are designated as “apartments,” representing 1% of the land in the county. If Mixed Use land use designations are accounted for, an additional 693 acres allow for multifamily development, or an additional 0.4% of the county.

Of the land designated for apartments, 42% falls within a census tract designated as “High Opportunity.” The next greatest amount of land designated for apartments is located in

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<sup>27</sup> Data from Howard County’s Land Use shapefile was used for this analysis.

“Moderate Opportunity” areas (35%), followed by “Very High” opportunity (21%) and Low” opportunity (2%).

Nearly all of the land designated as Mixed Use that includes residential uses is located in very high opportunity areas. If combined with land designated for apartments, 39% of land designated for multifamily development is located in “Very High” opportunity areas, followed by “High” opportunity areas (32%), “Moderate” opportunity areas (28%), and “Low” opportunity areas (2%).

**Definition of family.** Howard County defines “family” in its zoning regulations as:

- A single person occupying a dwelling and maintaining a household; or
- Two or more persons related by blood, marriage or adoption, occupying a dwelling, living together, and maintaining a common household or
- Not more than eight unrelated persons occupying a dwelling, living together, and maintaining a common household.

**Group homes.** Howard County defines “home care” as “the keeping during part of a 24 hour period of not more than eight children at one time or not more than three elderly or medically handicapped individuals at one time in a residence, under a license or registration issued by the State of Maryland.”

Home care is considered an accessory use and permitted by right in all residential districts. However, how home care is described as an accessory use is at odds with the definition provided in the zoning ordinance. In each zone’s accessory use section, home care is allowed:

“...provided that if home care is combined with housing of mentally or physically disabled persons, or persons 62 years of age or older...the total number of persons receiving home care at one time plus the number of persons being housed shall not exceed eight.”

**APFO.** In January 2018, Howard County commissioned a report titled “Economic and Fiscal Impacts of the Proposed Adequate Public Facilities Ordinance on Howard County.” The report found that based on data provided by the Howard County Department of Planning and Zoning, the proposed 2019 APFO legislation would result in an effective “moratorium on residential development in the county.” Between 2022-2025, it was estimated that the APFO legislation as written would result in a reduction of 6,900 housing units (approximately 3,300 apartments) over this time period, as well as a reduction of between 4,400-4,700 jobs, almost \$1.9 billion in construction activity, and a loss of \$56 million in government revenue.

According to the County’s April 2023 Development Monitoring System Report, “during the latest reporting period, from January through December 2022, 753 housing units were

built. This is a decrease from the previous reporting period when 971 units were built, and the smallest number built over the last five years.” Of the units built in the last reporting period, 45% were single family detached units, 49% were townhomes, and 6% were apartment units. However, the report stated that “greater percentages of apartment units are likely to be built in future years given the zoning of the remaining undeveloped land in the County, as well as higher density redevelopment initiatives.” According to the County, undeveloped parcels make up about 2% of all land in the county.

In 2022, the County issued 632 building permits, which was 63% less than the number of permits issued the year prior (1,799 permits). Over the last five years, an average of 1,256 new housing units have been built in the county.

The County does have special provisions related to APFO and the development of affordable housing. The County allows affordable housing projects to move ahead, subject to conditions, if the project is located in an attendance area of a school that is closed for development due to projected enrollment in the school capacity chart. The project is allowed to move forward if:

- At least 40% of the units must be affordable to households with income 60% or less of the metropolitan statistical area median income; and
- The project is led by or in partnership with a local nonprofit or the Housing Commission; and
- The project is seeking or has received an allocation of LIHTC or other state or federal financial assistance for affordable housing; and
- The project has obtained a letter of support from the County Executive; and
- The County Council and County Executive have approved either a Payment in Lieu of Taxes (PILOT) agreement for the project or a resolution authorizing the project to proceed.

Additionally, if the project developer applies for State Low Income Tax Credits or funding, they must send a notice of estimates of the number of units and unit types to several local government entities, including the Howard County Public School System, Office of the Superintendent, Office of School Planning, Department of Planning and Zoning, and the Department of Housing and Community Development. If the project is awarded the tax credits/funds, the representative for the Superintendent or Office of School Planning must articulate the projected impact of the development on the Howard County Public School System, as well as potential strategies to address the impact. Using this information, the Director of Housing and Community Development must prepare a written report that describes the identified impacts and strategies to address the impacts, which is reviewed and considered by the Housing and Community Development Board. The Board must provide their recommendations to the County Council.

In August 2024, Howard County announced the establishment of the Adequate Public Facilities Act (APFO) Review Committee following the adoption of HoCo By Design in 2023. The Committee is charged with reviewing and recommending changes to the County's APFO, including evaluating the housing allocations chart and adequacy tests for schools and roads.

**Recommendations for more inclusive environments.** The following recommendations for Howard County related to zoning and land use include:

- Implement the zoning-related recommendations and actions articulated in both the County's Housing Opportunities Master Plan and HoCo By Design, which include using incentives to produce income-restricted housing units and increasing opportunities for missing middle housing through the creation and use of zoning tools and incentives.
- Embrace "dynamic zoning" best practices with respect to parking, to reduce development costs and embrace changing transportation alternatives (e.g., ride share services, non-vehicular transportation). Areas where parking is already available, such as large surface parking lots that are primarily occupied during the day, could be shared with attached-housing and even multifamily communities, making better use of land and better aligning with conservation goals.
- With the County revisiting its APFO legislation later this year, consider exempting affordable housing for families from APFO or pursuing a process like Montgomery County to eliminate restrictions on residential development altogether. Continue to exempt MIHU units and senior housing from APFO.

## **Annapolis**

**Current zoning regulations.** A review of Annapolis' current zoning regulations found that the allowance of housing types other than single family detached by right is limited, but broadly allowed as a special exception use or a use subject to standards.

Two-family dwellings, defined as "any dwelling containing two dwelling units," are allowed by right in six residential districts and allowed as a special exception use and/or subject to additional standards in two other residential districts. Two-family dwellings are allowed by right in five mixed use/office districts. Overall, two-family dwellings are allowed by right on 30% of the land in Annapolis (25% in residential districts, 5% in mixed use/office districts). Comparatively, single family detached housing is allowed by right in 89% of the city.

Multifamily housing by right is similarly limited throughout Annapolis. One commercial zoning district in the city allows multifamily development by right (Business Revitalization District – BR). However, multifamily housing is allowed as a "special exception use" or "subject to standards" in the following districts:

- Seven residential districts;
- Four office districts;

- Two commercial districts; and
- One mixed use district.

Overall, multifamily housing is allowed explicitly by right in less than one percent of the city. Where subject to standards or listed as a special exception use, multifamily housing can be built on 35% of the land within the city.

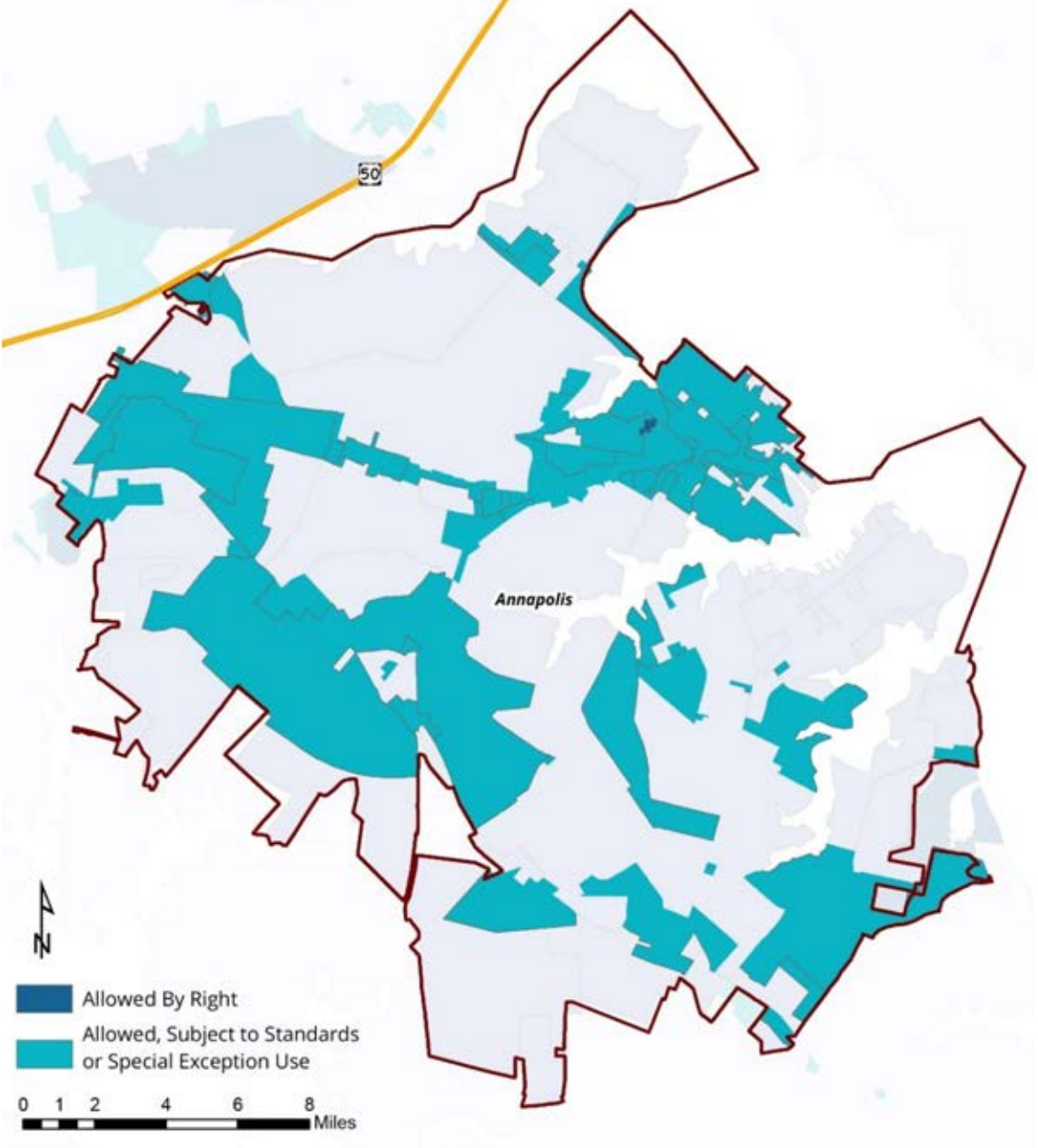
In addition to listing multifamily housing as an allowable use, City code also specifically articulates “multifamily with less than 12 units” and “multifamily with less than 6 units.” Multifamily housing with 12 or fewer units is permitted but subject to specific standards in the Professional Mixed Office (PM) zoning district, while multifamily housing with 6 or fewer units is permitted but subject to standards in the General Residence Neighborhood Conservation (R3-NC) zoning district. The aforementioned zoning districts make up approximately 1% of land within city boundaries.

Figures VIII-21 through VIII-23 show the location of different housing types in Annapolis allowed by right or conditionally.

**Zoning and opportunity.** An analysis for this report looked at where multifamily housing development is allowed in the city with census tracts and their “opportunity” designation. Since there is only one zoning district in the city that allows multifamily development by right, this analysis also included areas where multifamily housing is allowed as a special exception use or subject to standards. As such, approximately 1,580 acres allow for multifamily development, representing 35% of the land in the city.

The analysis found that 43% of the land that allows multifamily development falls within a census tract designated as “Moderate Opportunity.” The next greatest amount of land allowing multifamily development is located in “High” opportunity areas (24%), followed by “Low” opportunity (22%) and “Very High” opportunity (11%).

**Figure VIII-21.**  
**Multifamily Housing Allowed By Right and Conditionally, City of Annapolis**

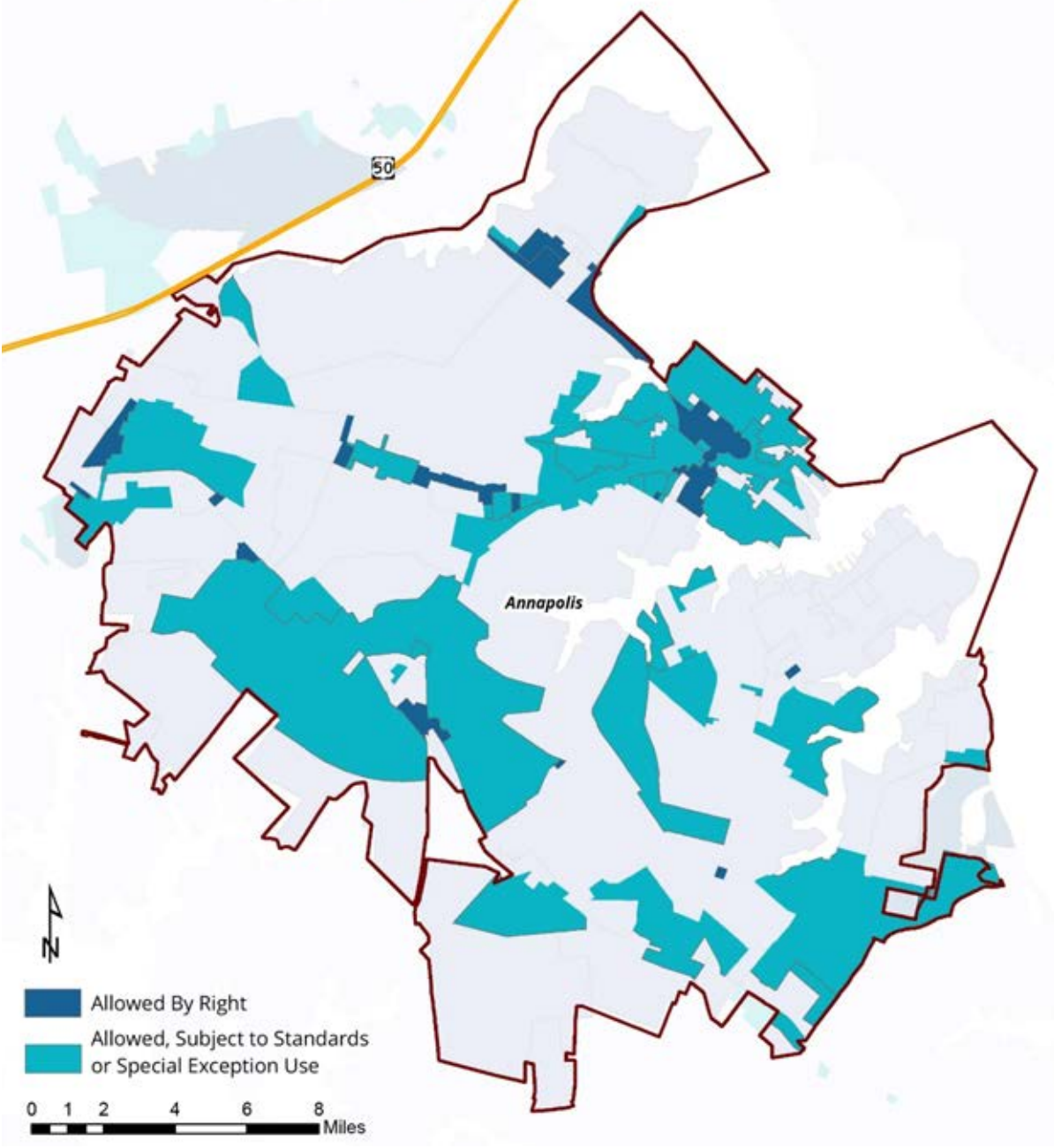


Note: “By Right” means that the permitted use is not characterized as a special exception use or subject to standards.

Source: City of Annapolis and Root Policy Research.



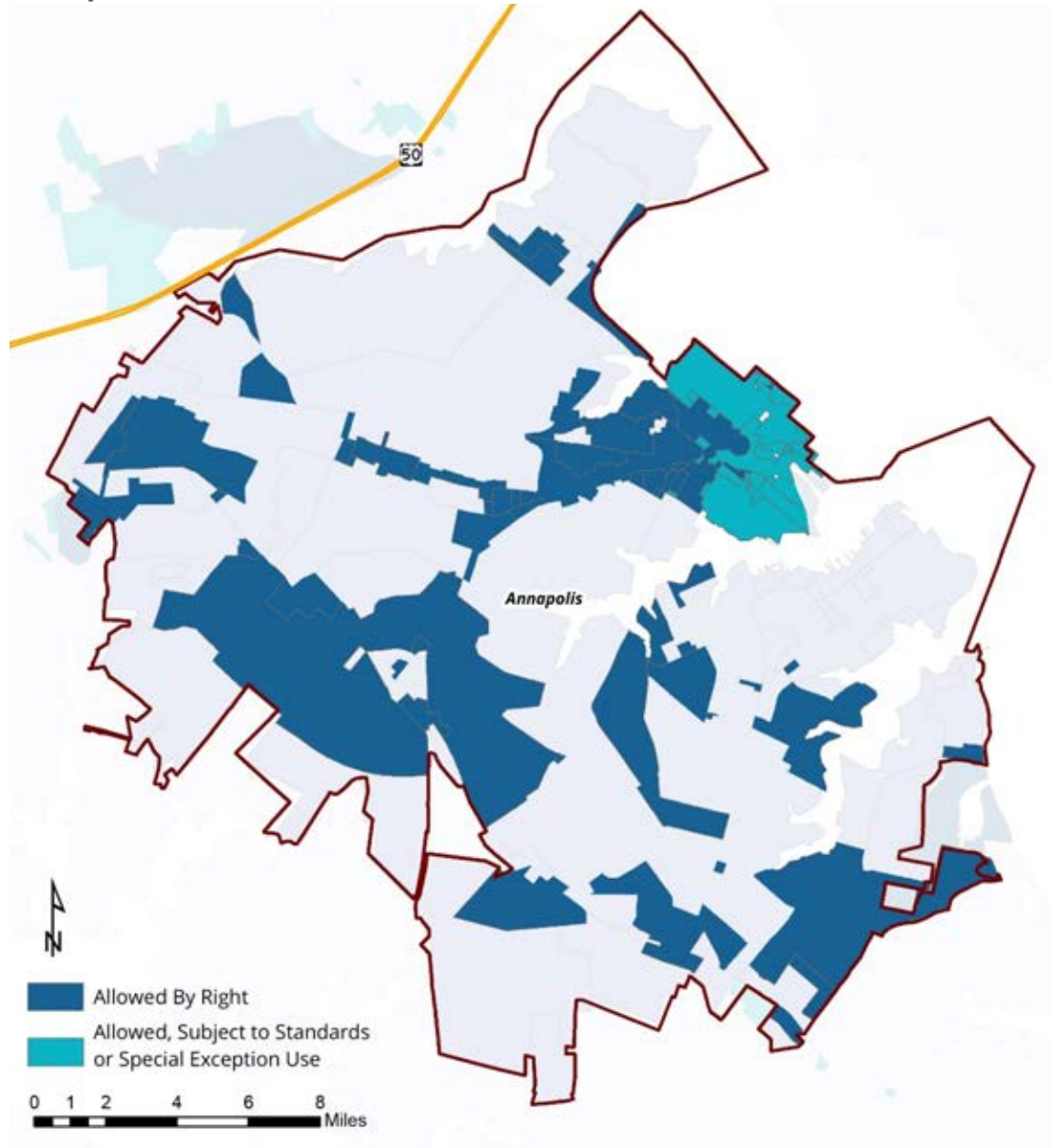
**Figure VIII-22.**  
**Single Family Attached Housing Allowed By Right and Conditionally, City of Annapolis**



Note: “By Right” means that the permitted use is not characterized as a special exception use or subject to standards.

Source: City of Annapolis and Root Policy Research.

**Figure VIII-23.**  
**Two Family Dwelling Housing Allowed By Right and Conditionally, City of Annapolis**



Note: "By Right" means that the permitted use is not characterized as a special exception use or subject to standards.

Source: City of Annapolis and Root Policy Research.

**Zoning as a barrier to housing production.** The City of Annapolis has identified zoning as a significant barrier to expanding and diversifying housing choice in the city. As articulated in the City's recent Comprehensive Plan update, *2040 Annapolis Ahead*, "[b]roadly speaking, zoning and regulatory authority has been used along the City's boundary with Anne Arundel County to restrict the creation of neighborhoods that could

have supplied housing to meet a growing demand.”<sup>28</sup> Moreover, the Plan goes on to describe that “the direct relationship between Annapolis’ zoning requirements and its housing shortage is best illustrated by the map on the facing page which shows that more than 60% of all areas zoned for residential use in the city do not allow a simple duplex....”<sup>29</sup>

Data cited in *2040 Annapolis Ahead* from the City’s 2015 Consolidated Plan described that single family detached and attached units combined to make up 61% of all units in the city, while duplexes, triplexes, and fourplexes made up 6% collectively. More recent data from the American Community Survey (2022 5-year estimates) found that the proportion of single family attached and detached units in Annapolis has slightly increased (64%) while the share of duplexes, triplexes, and fourplexes in the city has decreased (5.4%). The Comprehensive Plan states that “zoning reform that legalizes modest apartment dwellings such as duplexes, triplexes, and fourplexes is one of the key recommendations of this Plan’s approach to housing.”

The plan lays out several goals related to Land Use and Housing. Below are the goals related specifically to zoning:

- **Land Use Goal 1.** *Simplify the zoning code to support infill development projects that complement the neighborhoods and creeksheds where they are located.*
- **Land Use Goal 3.** *Expand housing options for workforce and moderate-income residents through zoning adjustments to the city’s residential districts.*
- **Housing Goal 4.** *Increase the supply, variety, and quality of housing types throughout the city to meet the needs of a diverse population.*

One of the performance measures indicated for Land Use Goal 3 and Housing Goal 4 is “the percentage of housing types with two, three and four units will grow from 6% to 15% of the total by 2030, and to 25% by 2040.”

One of the specific actions (LU3.1) articulated under Land Use Goal 3 is for the City to:

- “Explore incremental adjustments to the city’s residential zones to allow for more diversity of housing types such as townhomes and duplexes that are compatible with existing neighborhoods, using architectural standards if needed to ensure compatibility (also listed in Chapter 5: Housing under Goal H4).”

At the writing of this report, the City of Annapolis has not updated its zoning ordinance to align with zoning revisions articulated in the 2040 Annapolis Ahead Comprehensive Plan.

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<sup>28</sup> [Annapolis Ahead, Comprehensive Plan 2040, July 2024, page 163](#)

<sup>29</sup> [Annapolis Ahead, Comprehensive Plan 2040, July 2024, page 164](#)

**Definition of family.** The City of Annapolis defines family as “one or more persons, each related to the other by blood, marriage, or adoption, who are living together in a single dwelling and maintaining a common household. A family includes any domestic servants and not more than one gratuitous guest residing with the family.”

The 2020 AI described the City’s definition of family as overly restrictive and recommended revising the definition to include other common household forms, such as two unmarried individuals living together in a committed relationships and seniors and persons with disabilities living together in informal supportive settings. Additionally, the term “servant” is outdated and should also be revised.

**Group homes.** The City of Annapolis defines group home as “any residential structure used to house a group of individuals in need of special residential facilities, but without extra medical or institutional services, guards or procedures, provided the facility is certified under guidelines and control of the State Departments of Health, Social Services, or Juvenile Services.” It is a best practice that the City does not include a limit on the number of unrelated individuals that can live together in group homes.

However, the City’s zoning ordinance does not allow group homes by right in any residential district. In the Conservation Residence (C1) district, group homes are allowed as a special exception use. Group homes are also allowed as a special exception use in a handful of commercial, office, and mixed-use districts. As highlighted in the 2020 AI, the City differs in its regulation of group homes and single family homes, which could impede the creation of group homes in Annapolis and limit housing choices for people living with disabilities.

**APFO.** According to the exemptions listed in Title 22.25.030 of Annapolis’ Code of Ordinances, both senior housing (“age-restricted residential projects”) and affordable housing developed pursuant to Title 42, Chapter 8 of the United States Code Low Income Housing Program (Section 8) and Section 42 of the IRS (LIHTC) are exempt from APFO. This is a best practice.

**Recommendations for more inclusive environments.** The following recommendations for Annapolis related to zoning and land use include:

- Implement the land use actions articulated in Annapolis Ahead 2040, which include zoning adjustments to allow for more diversity of housing types, such as townhomes and duplexes.
- The definition of family should be revised to be more broad and include other types of common household forms (e.g., two unmarried individuals living together in a committed relationship). The term “servant” should also be removed from the definition.
- Group homes need to be allowed in at least one residential zone district by right to facilitate inclusive shared living arrangement for residents with special needs,

including persons living with disabilities and persons in recovery. Not allowing this use by right in at least one residential district could conflict with the Federal Fair Housing Act.



**Figure VIII-13. Findings from Supplemental Zoning Review, 2024**

	Annapolis	Anne Arundel County
<b>Allowing Diversity of Housing Types</b>		
<b>Multifamily housing is allowed in a variety of districts</b>	Allowed by right only in the Business Revitalization district. Allowed as a special exception use or subject to standards in R3 and R4 zones, as well as some commercial, mixed-use, and professional office districts. Also allowed through the PUD process.	Effective July 1, 2025, multifamily dwellings will be allowed by right in R-10, R-15, R-22, all Town Center and Mixed Use Districts, and allowed conditionally in R-1, R-2, and R-5 districts and in C-1, C-2, and C-3 commercial districts.
<b>Attached, attainable housing is allowed in a variety of districts</b>	Two-family dwellings allowed by right in R3 and R4 zones, as well as mixed-use and professional office districts and one industrial district; special exception use in a few commercial districts. Single-family attached allowed by right in professional office districts; special exception use in R3 and R4 zones, as well as some commercial, mixed use, and professional office districts.	Effective July 1, 2025, a wide variety of dwelling types (duplex, triplex, fourplex, multiplex, townhomes and stacked townhomes) will be allowed either by right or conditionally in a broad range of residential, commercial, mixed use and town center districts, including both lower density and higher density residential districts.
<b>Definition of family and household and occupancy limits does not create barriers to choice</b>	"Family" is defined as one or more persons, each related to the other by blood, marriage or adoption, who are living together in a single dwelling and maintaining a common household. A family includes any domestic servants and not more than one gratuitous guest residing with the family.	No definition of family or limit on the number of unrelated persons living in a housing unit
<b>Group homes are allowed in many residential districts</b>	No; group homes are excluded from all residential districts except the Conservation Residence (C1) district.	Group homes with 8 or fewer people are allowed by right in all residential zones; group homes with 9-16 people are considered conditional uses in all residential zones.
<b>Mitigating Requirements that Raise Housing Costs</b>		
<b>Requirements for special review, public hearing, notices are not excessive for affordable housing</b>	Yes, for group homes.	Workforce housing is a conditional use in the R-5, R-10, and R-15 districts.
<b>Parking requirements are not excessive</b>	For multi-family, one space per dwelling unit in C1, C2P, P, PM2 districts; 1.8 spaces per unit in BCE district; and 1.5 spaces per unit in all other districts. For single-family attached, two spaces are required per dwelling unit. Aside from one district, one parking space required for each single-family detached unit.	For multifamily, 1 space per bedroom (3 spaces for 3 bedrooms) and 2 spaces for detached and attached housing (2.5 spaces for townhomes). Workforce housing requires 1.5 spaces for a 2 BD unit and 2 spaces for a 3 BD unit.
<b>Providing Residential Development Incentives</b>		
<b>APFO does not apply to affordable housing developments (all types)</b>	Age-restricted residential projects and properties developed pursuant to Title 42, Chapter 8 of the United States Code Low Income Housing Program (HUD-funded properties), or	Only for housing for "elderly of modest means" and "affordable housing or workforce housing under Title 10, Article 18 of the code." Additionally, LIHTC-funded affordable housing developments
<b>Policy of making surplus public land available for affordable housing</b>	Not identified in policies	No
<b>Inclusionary zoning/Moderately price dwelling unit policy</b>	Yes, law requires all developers of more than 10 units must make 15% of their units either for sale or rent be moderately priced dwelling units (MPDUs).	Yes, inclusionary zoning, effective on July 1, 2025
<b>Voluntary</b>	n/a	n/a
<b>Mandatory</b>	Yes, for developments of more than 10 units	Yes, for developments of more than 10 units, effective on July 1, 2025
<b>Fast track development for affordable housing</b>	Not identified in policies	No
<b>Fee waivers for affordable housing</b>	Not identified in policies	Housing for elderly of modest means and workforce housing are exempt from water and sewer fees. Affordable housing developed by a nonprofit serving households with incomes of 120% AMI or less and ADUs not constructed with a new single-family detached unit are exempt from impact fees. Effective July 1, 2025, MDPU units are exempt from 50% of water/sewer capital facility connection charges.



**Figure VIII-13. (Continued) Findings from Supplemental Zoning Review, 2024**

	Baltimore City	Baltimore County
<b>Allowing Diversity of Housing Types</b>		
<b>Multifamily housing is allowed in a variety of districts</b>	Yes, the city has adopted a very flexible set of districts that allow many housing types	Allowed by right in DR10.5 and DR16 residential zones, as well as the OR2, RAE1, and RAE2 zones. Allowed in DR5.5, as well as several business and office residential districts "subject to findings of compatibility by the hearing officer."
<b>Attached, attainable housing is allowed in a variety of districts</b>	Yes, the city has adopted a very flexible set of districts that allow many housing types	Semidetached and duplex dwellings are permitted by right in all residential districts. These housing types are allowed conditionally in three business districts.
<b>Definition of family and household and occupancy limits does not create barriers to choice</b>	Defined as: (i) an individual; (ii) 2 or more people related by blood, marriage, adoption, or State-supervised foster care, living together as a single housekeeping unit in a dwelling unit; or (iii) a group of not more than 4 people, who need not be related, living together as a single housekeeping unit in a dwelling unit. The City has a reasonable accommodation policy that articulates the process to evaluate requests by group homes or supportive homes to waive the definition of family in order to locate in single-family dwelling zones and be in compliance with the FHA.	Family is defined as "Any number of individuals lawfully living together as a single housekeeping unit and doing their cooking on the premises, as distinguished from a group occupying a boarding or rooming house or hotel."
<b>Group homes are allowed in many residential districts</b>	Permitted by right in a variety of districts, including all residential districts, commercial, office-residential, industrial, mixed-use, and other special districts.	Community care centers (e.g., group homes) are considered "special exception uses" in all residential zones.
<b>Mitigating Requirements that Raise Housing Costs</b>		
<b>Requirements for special review, public hearing, notices are not excessive for affordable housing</b>	A diversity of housing types are allowed by right	Those applying for permits for siting community care centers in Baltimore County must apply for a continuation of the special exception designation every five years. Multifamily housing in select districts are subject to compatibility findings from the hearing officer.
<b>Parking requirements are not excessive</b>	Affordable housing targeting < 60% AMI has lower parking requirements (1 space per 2 dwelling units). Parking reductions are also in place for small dwellings (<500 square feet) at 0.5 spaces per dwelling and housing for the elderly, with 1 space required for every 4 units.	Two spaces are required for single-family detached and all single-family attached homes. For multifamily, 1 space per studio, 1.25 spaces for one- or two-bedrooms, and 1.5 spaces required for three or more bedrooms. For housing for the elderly, ranges from 1 space for 1-2 dwellings depending on zone; if development is supported by rent subsidy, developer may submit petition for reductions.
<b>Providing Residential Development Incentives</b>		
<b>APFO does not apply to affordable housing developments (all types)</b>	n/a	No, affordable housing is not exempt from APFO.
<b>Policy of making surplus public land available for affordable housing</b>	Yes	n/a
<b>Inclusionary zoning/Moderately price dwelling unit policy</b>	Yes, inclusionary housing law requires new developments with 20 units or more to make 10% of their units income-restricted (in some cases, 15%).	n/a
<b>Voluntary</b>	n/a	n/a
<b>Mandatory</b>	Yes	n/a
<b>Fast track development for affordable housing</b>	n/a; however, many other affordable housing development incentives are available.	n/a; however, the County offers multifamily housing financing, homeownership assistance, and rehabilitation support.
<b>Fee waivers for affordable housing</b>	n/a; however, many other affordable housing development incentives are available.	n/a; however, the County offers multifamily housing financing, homeownership assistance, and rehabilitation support.

**Figure VIII-13. (Continued) Findings from Supplemental Zoning Review, 2024**

	Harford County	Howard County
<b>Allowing Diversity of Housing Types</b>		
<b>Multifamily housing is allowed in a variety of districts</b>	Multifamily housing is not allowed by right in any zones; this housing type is subject to either special-development or special-exception regulations. Mid-rise apartments allowed in R3 zone if developed through a planned residential development; mid-rise and high-rise apartments allowed in R4 zone through the conventional development with open space and planned residential development processes.	Multifamily housing is allowed by right in the R-SA-II, RA-15, R-APT, and R-VH residential zones. It is also allowed by right in the TOD zones, historic office and historic commercial zones, and the Planned Golf Course Community zone. It is a conditional use in the CAC, TNC, and R-MH zones.
<b>Attached, attainable housing is allowed in a variety of districts</b>	Duplexes and semidetached dwellings allowed by right in R4, as well as residential-office, village residential, and several commercial districts. Townhomes allowed in R4 by right, too.	Single-family attached homes are allowed by right in six residential zones, as well as the historic office and historical commercial zones, TOD zones, and the Planned Golf Course Community zone. Zero lot line homes are allowed by right in five residential zones while semidetached homes are only allowed by right in R12.
<b>Definition of family and household and occupancy limits does not create barriers to choice</b>	No restrictions that limit choice for certain household types; household is a "social unit living together." Group homes are restricted to eight unrelated people.	Family is defined as a) a single person occupying a dwelling and maintaining a household b) two or more persons related by blood, marriage, or adoption, occupying a dwelling living together, and maintaining a common household, or c) not more than eight unrelated persons occupying a dwelling, living together, and maintaining a common household.
<b>Group homes are allowed in many residential districts</b>	Group homes are considered special exception uses in all residential zones; they are allowed by right in one business district and two industrial districts.	"Home care" facilities are permitted by right as accessory uses in several residential districts.
<b>Mitigating Requirements that Raise Housing Costs</b>		
<b>Requirements for special review, public hearing, notices are not excessive for affordable housing</b>	All housing types are subject to special development regulations in the conventional development with open space and planned residential development processes. High-rise apartments are not allowed to be developed through the conventional development process; mid-rise and garden apartments are subject to special development regulations.	Requirements are consistent across development types.
<b>Parking requirements are not excessive</b>	Require 2 off street parking spaces for smaller, attached homes (row, duplex, etc); may consider adding flexibility. Require 1 space per 2 beds plus 1 per employee for group homes but only 1 per 4 patient beds for nursing homes and assisted living facilities. Group home requirement should be studied for possible reduction.	Two spaces + .5 per unit for visitors for detached and attached in all districts; two spaces plus .3 for visitors per unit for apartments. For age-restricted adult housing, two spaces per unit are required in all districts plus .3 spaces for visitors for single family detached and attached dwellings. One space plus .3 space for visitors per unit for apartments and multiplexes in age-restricted housing.
<b>Providing Residential Development Incentives</b>		
<b>APFO does not apply to affordable housing developments (all types)</b>	Housing for the elderly and continuing care retirement communities are exempt from APFO.	Yes, "special affordable housing opportunities," subject to specific conditions, are exempt from APFO. Moderate Income Housing Units (MIHU) are also exempt.
<b>Policy of making surplus public land available for affordable housing</b>	n/a	n/a
<b>Inclusionary zoning/Moderately priced dwelling unit policy</b>	Starter home density bonus	Yes, Moderate Income Housing Unit (MIHU) program. All zones require MIHUs with percentage ranging from 10-20%
<b>Voluntary</b>	Yes	n/a
<b>Mandatory</b>	n/a	Yes
<b>Fast track development for affordable housing</b>	n/a	"Critical economic development projects" are fast tracked
<b>Fee waivers for affordable housing</b>	n/a	n/a

Source: Root Policy Research.

## SECTION IX.

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### FAIR HOUSING ENFORCEMENT, CAPACITY, AND RESOURCES

## SECTION IX.

# Fair Housing Enforcement, Capacity, and Resources

This section discusses fair housing enforcement in the context of state and local capacity to effectively respond to fair housing issues. It begins with a summary of challenges gathered through the Fair Housing Enforcement Working Group that was assembled to support this study. The section concludes with summaries of relevant legal cases and actions brought for violation of civil rights laws.

### Fair Housing Enforcement Working Group

To support development of the AI, as described in Section I, a Working Group on Fair Housing Enforcement in the Private Market was assembled, co-chaired by Susan McClannahan of the Equal Rights Center and David Skinner of the Baltimore County Department of Housing and Community Development (DHCD). Its goal was to identify challenges and recommend solutions to fair housing enforcement, addressing the question of:

*How can we coordinate local, State, and private-sector authority and capacity to maximize enforcement of fair housing protections?*

The working group met five times during development of the AI, first to pinpoint the primary challenges with the current state of fair housing law enforcement, and then to recommend specific action steps, metrics and milestones, and responsible parties to carry out the action steps. Several of those recommendations are included in an Enforcement section of the Regional Action Plan in Section X of this document.

### Primary Fair Housing Challenges Identified by the Enforcement Working Group

- Education and public awareness are a crucial element of fair housing enforcement, and there is a need for better public information on fair housing rights and responsibilities and how to respond to acts of discrimination.
  - Trainings should be accessible, engaging, exciting—and memorable, utilizing modern technology and role playing.
  - Trainings should be executed in concert with trusted parties who work with vulnerable groups (e.g., voucher holders, low income families with children, LEP populations, BIPOC populations) and property owners (e.g., trade associations)—and could be delivered by organizations that specialize in fair housing.

- Trainings should include practical advice for property owners to encourage them to comply with regulations. Focusing on building knowledge to avoid violations and keep people in housing is more productive.
- There is a need for key housing industry personnel to have accurate information on fair housing rights and responsibilities.
  - City and County housing and community development offices should offer annual fair housing training to housing providers that receive agency funding.
  - City and County Human Rights agencies should mandate fair housing training as a public interest items in all settlement agreements.
  - Trainings should also be offered or required of licensed property owners in jurisdictions where licenses are required.
- Robust, systematic, regional testing should be carried out to uncover acts of discrimination and facilitate effective program and policy responses.
- There is a need to make the complaint taking and investigation process more transparent—e.g., keeping people aware of when they should expect a response.
  - City and County Human Rights Offices and MCCR should convene conversations on the complaint process to identify any potential barriers in the complaint process and opportunities for improvement.
  - Local jurisdictions and the State of Maryland should increase funding and resources for their fair housing enforcement agency or commission.
  - Enforcement agencies should more actively share best practices (e.g., model fair housing ordinances; landlord requirements for reporting denials).

## Federal Fair Housing Laws and Statutes

Federal law that protects residents from discrimination in housing and promotes housing choice is found in a number of acts, which are summarized below in chronological order. Many of these federal laws and orders are enforced by the U. S. Department of Housing and Urban Development's (HUD) Fair Housing and Equal Opportunity Division (FHEO). The regional HUD FHEO office is located at The Wanamaker Building, 100 Penn Square East Philadelphia, PA 19107. Phone: (215) 656-05007, Fax: (215) 656-3445, TTY: 1 (800) 855-1155.

**Title VI of the Civil Rights Act of 1964** provides for nondiscrimination in federally assisted programs on the basis of race, color, or national origin. Title VI states that no person should be excluded from participation in, denied the benefit of, or subjected to discrimination in any program or activity receiving federal financial assistance.

**Fair Housing Act of 1968.** Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in housing and housing related services on the basis

of race, color, religion, sex (including gender identity and sexual orientation), national origin, handicap (disability), or familial status.

The Fair Housing Act (FHA) also includes affirmative requirements related to persons with disabilities. It is unlawful to refuse to make reasonable accommodations in rules, policies, practices, or services, if such an accommodation is necessary for a “handicapped” (the term used in the Act) person to use the housing. Further, landlords must allow reasonable modifications of a dwelling or common use areas, if necessary, for residents with disabilities to access common spaces and the housing.

The FHA also contains requirements for multifamily dwellings containing four or more units ready for first occupancy after March 13, 1991. All ground floor units must have:

- an accessible route into and through the unit;
- accessible light switches, electrical outlets, thermostats, and other environmental controls;
- reinforced bathroom walls to allow later installation of grab bars; and
- kitchens and bathrooms that can be used by people in wheelchairs.

In addition, all public and common areas must be accessible to persons with disabilities and all doors and hallways must be wide enough for wheelchairs.

HUD’s Discriminatory Effects Standard,<sup>1</sup> reinstated in 2023, formalizes the Fair Housing Act’s prohibition on actions which have an unjustified discriminatory effect—meaning they were facially neutral practices but had a disparate impact (v. acts of direct discrimination) on federal protected classes.

**Architectural Barriers Act of 1968.** The Architectural Barriers Act (ABA) requires that certain buildings financed with federal funds be designed and constructed to be accessible to persons with disabilities. This Act covers

- Any building that is constructed or altered by or on behalf of the United States;
- that is leased by the Federal Government; or
- which is financed in whole or in part by a grant or a loan made by the United States.

The third application of this Act only applies to loans or grants which have specific design, construction, or alteration requirements attached to the performance of the grant or loan.

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<sup>1</sup> <https://www.federalregister.gov/documents/2023/03/31/2023-05836/reinstatement-of-huds-discriminatory-effects-standard>



In 1989 the HUD Secretary made a policy decision that the ABA would also apply to programs and activities funded under the CDBG program.

**Section 3 of the Housing and Urban Development Act of 1968.** The purpose of Section 3 of the Housing and Urban Development Act of 1968 is to ensure that low income and persons receiving public assistance for housing benefit from employment and economic opportunities generated by HUD financed projects. Section 3 requires that a grantee:

- Implement procedures to notify eligible residents within the community of training and employment opportunities generated by the grant award.
- Notify potential contractors and subcontractors of their responsibilities under this Act.
- Facilitate the training and employment of qualified residents.
- Ensure that all contractors and subcontractors are in compliance with Section 3 requirements.
- Document all actions taken to comply and report any impediments encountered and the results of any actions taken as a result of Section 3 requirements.

Section 3 requirements must be met only for Section 3 covered assistance, which is defined as:

- Public and Indian Housing Assistance;
- Section 8 and other housing assistance;
- housing rehabilitation;
- housing construction; and
- other housing assistance.

Both the grantee and subcontractors are covered if the grantee receives over \$200,000 and the subcontractor receives over \$100,000. Only the grantee is covered if the contractor or subcontractor receives less than \$100,000. All grantees, contractors, and subcontractors receiving Public and Indian Housing Assistance **MUST** comply with Section 3 requirements regardless of the amount of the award.

**Section 504 of the Rehabilitation Act of 1973.** Section 504 states that no person because of their disability can be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Any individual who has a physical or mental disability which, for that individual, constitutes or results in a substantial limitation in one or more major life activities; has a history of such an impairment; or is regarded as having such an impairment is covered under Section 504. Current drug abusers and alcoholics who are not in recovery are not covered.

**Section 508 of the Rehabilitation Act of 1973.** Section 508 was enacted to eliminate barriers in information technology, to make available new opportunities for people with disabilities, and to encourage development of technologies that will help achieve these goals.

- The law applies to all Federal agencies when they develop, procure, maintain, or use electronic and information technology.
- Agencies must give disabled employees and members of the public access to information that is comparable to the access available to others.

**Title I of the Housing and Community Development Act of 1974.** Title I states that no person shall be denied the benefits of or be subjected to discrimination under any program or activity funded in whole or in part with funds made available through the Housing and Community Development Act on the basis of race, color, national origin, sex, age, or handicap (disability).

**Housing for Older Persons Act (HOPA) of 1988.** HOPA makes several changes to the 55 and older exemption that was part of the FHA. Since the 1988 Amendments, the FHA has exempted from most of its familial status provisions properties that satisfy the Act's 55 and older housing condition.

First, it eliminates the requirement that 55 and older housing have "significant facilities and services" designed for the elderly.

Second, HOPA establishes a "good faith reliance" immunity from damages for persons who in good faith believe that the 55 and older exemption applies to a particular property, if they do not actually know that the property is not eligible for the exemption and if the property has formally stated in writing that it qualifies for the exemption. HOPA retains the requirement that senior housing must have one person who is 55 years of age or older living in at least 80 percent of its occupied units.

Fifty-five years and older properties are not exempt from other provisions of the law including providing reasonable accommodations to persons with disabilities.

**Executive Order 13217 (Community Based Alternatives for Individuals with Disabilities) of 2001.** Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

**LEP Guidance.** Recipients of federal funds are required to take reasonable steps to ensure meaningful access to their programs and activities by Limited English Proficiency (LEP) persons. Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency) from 2000 seeks to eliminate language barriers to full and meaningful participation in federally funded programs and services.

While designed to be a flexible and fact-dependent standard, the starting point for local jurisdiction compliance is an individualized assessment that balances the following four factors ([https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/promotingfh/lep-faq](https://www.hud.gov/program_offices/fair_housing_equal_opp/promotingfh/lep-faq)):

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;
2. the frequency with which LEP individuals come in contact with the program;
3. the nature and importance of the program, activity, or service provided by the program to people's lives; and
4. the resources available to the grantee/recipient or agency, and costs.

As indicated above, the intent of this guidance is to find a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small business, or small nonprofits.

HUD has adopted a "safe harbor" for translation of written materials. The Guidance identifies actions that will be considered strong evidence of compliance with Title VI obligations. Safe harbors provide a starting point for recipients to consider:

- Whether and at what point the importance of the service, benefit, or activity involved warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the nature of the information sought warrants written translations of commonly used forms into frequently encountered languages other than English;
- Whether the number or proportion of LEP persons served warrants written translations of commonly used forms into frequently encountered languages other than English; and

- Whether the demographics of the eligible population are specific to the situations for which the need for language services is being evaluated. In many cases, use of the "safe harbor" (see the table that follows) would mean provision of written language services when marketing to the eligible LEP population within the market area. However, when the actual population served (e.g., occupants of, or applicants to, the housing project) is used to determine the need for written translation services, written translations may not be necessary.

Each jurisdiction should conduct a four factor analysis of LEP needs when they update their Citizen Participation Plans in conjunction with their five-year Consolidated Plans and follow the guidance summarized in the table below for translation and interpretation protocol.

Size of Language Group	Recommended Provision of Written Language Assistance
1,000 or more in the eligible population in the market area or among current beneficiaries	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> more than 50 in number	Translated vital documents
More than 5% of the eligible population or beneficiaries <i>and</i> 50 or less in number	Translated written notice of right to receive free oral interpretation of documents.
5% or less of the eligible population or beneficiaries and less than 1,000 in number	No written translation is required.

## State and Local Laws and Ordinances

The State of Maryland and the jurisdictions represented in this study have protections that exceed those offered by the FHA, although those enhanced protections are inconsistent among jurisdictions. Local jurisdiction protections apply to locally enforced ordinances. The information that local jurisdictions make available on public websites also varies, with Baltimore City having the most extensive and accessible information for the public (<https://civilrights.baltimorecity.gov/fair-housing-information>)

The State of Maryland extends protections based on marital status, source of income, and military status in addition to covering those protections in the Federal Fair Housing Act, which are then also enforced by the State. Unlike the federal level, Maryland provides explicit statutory protection for people based on sexual orientation and gender identity.

## **State of Maryland Human Relations Act, State Government Article §20-700<sup>2</sup>**

It is the policy of the State of Maryland “to provide for fair housing throughout the State to all, regardless of race, color, religion, sex, familial status, national origin, marital status,<sup>3</sup> sexual orientation, gender identity, disability, source of income,<sup>4</sup> or military status;<sup>5</sup> and to that end, to prohibit discriminatory practices with respect to residential housing by any person, in order to protect and insure the peace, health, safety, prosperity, and general welfare of all.” State Government Article, §20-702, Annotated Code of Maryland.

Maryland has been a leader in protecting its residents from discrimination in many ways, from codifying protections against discrimination on the basis of sexual orientation (2001) and establishing gender identity as a protected class (2014) to identifying discrimination based on an employee’s hair texture, style, or protective head coverings as a type of racial discrimination.

The two most recent additions to the state's list of protected classes are source of income, added in 2020 with the Housing Opportunities Made Equal Act (HOME Act), and military status, added by Senate Bill 413 in the 2024 Session of the Maryland General Assembly.

**The State of Maryland Commission on Civil Rights (MCCR)**, an independent State agency, is represented by the Office of the General Counsel. The Office is autonomous from the Attorney General’s Office per State Government Article, §20-206, which created an independent legal counsel for the agency. The Maryland General Assembly’s intent was to avoid conflicts of interest when the State is charged with unlawful discrimination in complaints filed with MCCR, as the Attorney General is the legal representative for State agencies.

The Maryland Commission on Civil Rights enforces the Maryland Human Relations Act and is designated as a Fair Housing Assistance Program (FHAP) by the U. S. Department of Housing and Urban Development. As Substantially Equivalent to HUD, it possesses similar powers as HUD to enforce the federal Fair Housing Act, as amended, and qualifies for HUD fair housing funds to help it carry out that enforcement.

Jurisdictions frequently refer fair housing complaints to the state if they do not have the capacity to process those. Note that no jurisdictions within the Baltimore region offer protection against housing discrimination on the basis of military status (except Baltimore

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<sup>2</sup><https://govt.westlaw.com/mdc/Browse/Home/Maryland/MarylandCodeCourtRules?guid=N45B27EE06CC011DEAFDEBD A78E040D7A&originationContext=documenttoc&transitionType=Default&contextData={sc.Default}>

<sup>3</sup> A protected class under the Equal Credit Opportunity Act

<sup>4</sup> Receipt of income from a public assistance program is a protected class under the Equal Credit Opportunity Act.

<sup>5</sup> Not protected under federal law



County's veteran's status); as such, all complaints of discrimination in housing on the basis of military status must therefore be directed to the state.

Aggrieved individuals or an organization that has been harmed as a result of discrimination may file complaints with MCCR directly. MCCR's Human Rights Commission determines if discrimination has occurred based on a preliminary investigation by MCCR staff. If investigation results in a Probable Cause finding, either the Complainant or Respondent can elect to remove the case to state court. In a case where the Human Rights Commission is the Complainant, they could then file a complaint in court after receiving a Probable Cause finding during an investigation.

MCCR does not have authority under state law to initiate litigation in court; however, the state's Office of Attorney General can file litigation on fair housing claims. If it is found that a respondent engaged in discriminatory housing practices, the respondent may be ordered to:

- Immediately cease unlawful discrimination in housing;
- Provide relief to injured parties; and/or
- Pay a civil penalty up to \$1,000 if this is the first offense, plus additional fines for each day the discriminatory housing practice continues and any subsequent violations.

Refusal to comply with MCCR orders has resulted in imprisonment.

The local MCCR office is located at 6 Saint Paul Street, Suite 900, Baltimore, MD 21202-1631.

**The City of Annapolis** prohibits discrimination in housing on the basis of race, color, religion, sex, familial status (including having or expecting children), national origin, gender identity, marital status,<sup>6</sup> sexual orientation, source of income,<sup>7</sup> disability, citizenship status,<sup>8</sup> or immigration status.<sup>9</sup> The City's Human Relations Commission (HRC) receives complaints and has the authority to impose fines, imprisonment, and/or other forms of remedy as they deem appropriate.

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<sup>6</sup> A protected class under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act

<sup>7</sup> Protected under the Maryland Human Relations Act and partially protected under the federal Equal Credit Opportunity Act (as "receipt of income derived from any public assistance program")

<sup>8</sup> Local protection only

<sup>9</sup> Local protection only

**Anne Arundel County** prohibits discrimination based on age,<sup>10</sup> ancestry,<sup>11</sup> citizenship,<sup>12</sup> color, creed,<sup>13</sup> disability, familial status, gender identity or expression, marital status,<sup>14</sup> national origin, occupation,<sup>15</sup> race, religion, sex, sexual orientation, or source of income.<sup>16</sup> Complaints are filed with the county Human Relations Commission (HRC).

Upon finding evidence of unlawful discrimination in housing in a formal hearing, the HRC may order a respondent to do any of the following:

- Cease and desist from discriminating in housing;
- Sell or lease property to the complainant; or
- Undergo anti-discrimination training.
- Further, discrimination in housing in Anne Arundel County is a Class A civil offense and may result in the imposition of a fine not exceeding \$10,000 for the first violation, plus additional fines for each day the unlawful practice continues and any subsequent violations.

**The City of Baltimore** prohibits discrimination because of race, color, religion, national origin, ancestry,<sup>17</sup> sex, age,<sup>18</sup> marital status,<sup>19</sup> familial status, physical or mental disability, sexual orientation, gender identity or expression, in addition to source of income.<sup>20</sup> Section 3-5 of the City Code includes explicit prohibitions against discrimination in insurance 3-5(c).<sup>21</sup>

The City's Community Relations Commission (CRC) of the Office of Equity and Civil Rights oversees complaints. Upon finding evidence of unlawful discrimination in housing, the CRC may order a respondent to do any of the following:

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<sup>10</sup> Protected under the federal Age Discrimination Act and the federal Equal Credit Opportunity Act.

<sup>11</sup> Local protection only

<sup>12</sup> Ibid

<sup>13</sup> Ibid

<sup>14</sup> Protected under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act

<sup>15</sup> Local protection only

<sup>16</sup> Protected under the Maryland Human Relations Act and partially protected under the federal Equal Credit Opportunity Act (as "receipt of income derived from any public assistance program")

<sup>17</sup> Local protection only

<sup>18</sup> Protected under the federal Age Discrimination Act and the federal Equal Credit Opportunity Act

<sup>19</sup> A protected class under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act.

<sup>20</sup> Protected under the Maryland Human Relations Act and partially protected under the federal Equal Credit Opportunity Act (as "receipt of income derived from any public assistance program")

<sup>21</sup> [https://legislative.baltimorecity.gov/sites/default/files/Art%2004%20-%20CommunRel\\_\(rev%2004-06-22\).pdf](https://legislative.baltimorecity.gov/sites/default/files/Art%2004%20-%20CommunRel_(rev%2004-06-22).pdf)

- Cease and desist from discriminating in housing;
- Sell or lease property to the complainant;
- Provide compensatory damages to the complainant; and/or
- Pay a civil penalty up to \$1,000 if this is the first offense, plus additional fines for each day the discriminatory housing practice continues and any subsequent violations.

**Baltimore County.** Article 3, Title 3, Subtitle 11 of the Baltimore County Code 2003 establishes and mandates the Baltimore County Human Relations Commission (HRC)<sup>22</sup> to investigate (but not bring) complaints of discrimination in the areas of employment, housing, education, public accommodations and finance on the basis of race, color, creed,<sup>23</sup> age,<sup>24</sup> religion, sex, physical and mental disability, national origin, marital status,<sup>25</sup> sexual orientation, status as a veteran,<sup>26</sup> and gender identity or expression. With respect to housing, source of income<sup>27</sup> is also a protected class according to Article 29, Title 2, Subtitle 2 of the Baltimore County Code. Baltimore County is the only jurisdiction in the region where veteran status is protected. The definitions and procedures for executing the public policy to eliminate discriminatory practices within the County are contained in Article 29 of the Code.<sup>28</sup>

Upon finding that a respondent has violated the County's fair housing protections, the HRC orders the respondent to cease and desist from the discriminatory act. It may additionally order the following:

- The rental or sale of housing,
- Anti-discrimination training,
- Nonmonetary relief, or
- Other relief as deemed appropriate by the Commission.

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<sup>22</sup> <https://www.baltimorecountymd.gov/boards-commissions/human-relations-commission>

<sup>23</sup> Local protection only

<sup>24</sup> Protected under the federal Age Discrimination Act and the federal Equal Credit Opportunity Act

<sup>25</sup> Protected under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act

<sup>26</sup> Local protection only

<sup>27</sup> Protected under the Maryland Human Relations Act and partially protected under the federal Equal Credit Opportunity Act (as "receipt of income derived from any public assistance program")

<sup>28</sup> Article § 29-2-101

**Harford County.** Citizens within Harford County have the ability to file complaints of housing discrimination<sup>29</sup> with the Harford County Human Relations Commission on the basis of race, color, creed,<sup>30</sup> sex, national origin, ancestry,<sup>31</sup> age,<sup>32</sup> occupation,<sup>33</sup> political opinion,<sup>34</sup> physical or mental disability, familial status, marital status,<sup>35</sup> and personal appearance.<sup>36</sup>

With the passing of source of income protections in Anne Arundel County, Baltimore City, and Baltimore County, Harford County is the only county in the region without source of income protection (Howard County has had source of income protection for more than 25 years). However, Harford County residents receive source of income protection at the state level through the State of Maryland's new source of income law.

However, Harford County does include "occupation" as a protected class. Although this protection is not as comprehensive as source of income, it overlaps with source of income protections in some areas. Occupation is defined in the County Code as "The principal lawful activity of one's life. Persons included in this definition are students, welfare recipients, retired persons and all other persons, irrespective of income, who are denied the equal protection of the laws."

In Harford County, violations of fair housing protections are misdemeanors. Respondents convicted of violating fair housing provisions face a fine of up to \$1,000 and/or imprisonment for up to six months. Complainants may also seek relief including damages and counsel fees.

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<sup>29</sup> <https://www.harfordcountymd.gov/DocumentCenter/View/950/Human-Relations-Complaint-Form-PDF?bidId=>

<sup>30</sup> Local protection only

<sup>31</sup> Ibid

<sup>32</sup> Protected under the federal Age Discrimination Act and the federal Equal Credit Opportunity Act

<sup>33</sup> Local protection only

<sup>34</sup> Local protection only

<sup>35</sup> Protected under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act

<sup>36</sup> Local protection only

**Howard County.** Section 12.207 of the Howard County Code prohibits discrimination on the basis of race, creed,<sup>37</sup> religion, disability, color, sex, national origin, age,<sup>38</sup> occupation,<sup>39</sup> marital status,<sup>40</sup> political opinion,<sup>41</sup> sexual orientation, personal appearance,<sup>42</sup> familial status, source of income,<sup>43</sup> citizenship,<sup>44</sup> immigration status,<sup>45</sup> or gender identity or expression in such a way that such person(s) are adversely affected in the area of housing.<sup>46</sup> The county's website on How To File a Discrimination Complaint, however, fails to include citizenship and immigration status as protected characteristics (<https://www.howardcountymd.gov/human-rights-equity/how-file-discrimination-complaint-case-processing-services>)

The Howard County Ordinance includes a provision related to restrictive covenants not included in the federal law. The Howard County Ordinance states “[a]ny person may decline to accept a document affecting title to real or leasehold property if the document includes any discriminatory restrictive covenant. Refusal to accept delivery of an instrument for this reason shall not be deemed a breach of a contract to purchase, lease, mortgage or otherwise deal with the property.” 12-207 III (b).

The HRC may order any of the following upon finding that unlawful discrimination in housing occurred:

- Monetary or nonmonetary appropriate action which may include actual damages suffered by the complainant and injunctive or other relief including attorney's fees,
- Civil penalties to be paid by the respondent in amounts not exceeding \$10,000 (if the respondent has not been found to have committed any prior unlawful housing practice), \$25,000 (if the respondent has been found to have committed one other unlawful housing practice in the five years before the complaint was filed), or \$50,000

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<sup>37</sup> Local protection only

<sup>38</sup> Protected under the federal Age Discrimination Act and the federal Equal Credit Opportunity Act

<sup>39</sup> Local protection only

<sup>40</sup> Protected under the Maryland Human Relations Act and the federal Equal Credit Opportunity Act

<sup>41</sup> Local protection only

<sup>42</sup> Ibid

<sup>43</sup> Protected under the Maryland Human Relations Act and partially protected under the federal Equal Credit Opportunity Act (as “receipt of income derived from any public assistance program”)

<sup>44</sup> Local protection only

<sup>45</sup> Ibid

<sup>46</sup>

[https://library.municode.com/md/howard\\_county/codes/code\\_of\\_ordinances?nodeId=HOCOCO\\_TIT12HESOSE\\_SUBTITLE\\_2HURI\\_S12.207UNHOPRCOLEPR](https://library.municode.com/md/howard_county/codes/code_of_ordinances?nodeId=HOCOCO_TIT12HESOSE_SUBTITLE_2HURI_S12.207UNHOPRCOLEPR)

(if the respondent has been found to have committed two other unlawful housing practices in the seven years before the complaint was filed).

Where the unlawful housing practice occurred in a business subject to licensing or regulation by state or county agencies, the HRC notifies the state or county agency and recommends appropriate disciplinary action including suspension or revocation of the license of the respondent.

**Summary of protected classes by county and city.** The table below compares the protected classes covered by jurisdiction ordinances.



Protected Class	Federal Fair Housing Act	State of Maryland	Counties				Cities	
			Anne Arundel County	Baltimore County	Harford County	Howard County	City of Annapolis	Baltimore City
Race	x	x	x	x	x	x	x	x
Color	x	x	x	x	x	x	x	x
National Origin	x	x	x	x	x	x	x	x
Religion	x	x	x	x		x	x	x
Sex	x	x	x	x	x	x	x	x
Familial Status	x	x	x		x	x	x	x
Disability	x	x	x	x	x	x	x	x
Marital Status		x	x	x	x	x	x	x
Sexual Orientation		x	x	x		x	x	x
Gender Identity or Expression		x	x	x		x	x	x
Source of Income		x	x	x		x	x	x
Ancestry			x		x			x
Age			x	x	x	x		x
Citizenship			x			x	x	
Occupation			x		x	x		
Personal Appearance					x	x		
Political Opinion					x	x		
Creed			x	x	x	x		
Status as a Veteran				x				
Immigration Status						x	x	

Note: Protected classes in green rows are protected by the federal Fair Housing Act and by the State of Maryland. Classes in gray rows are protected by the State of Maryland.

## **Regional and Local Capacity**

This section reviews the capacity of the jurisdictional partners in enforcing fair housing laws and providing education and outreach activities, and highlights trends and challenges in fair housing enforcement.

### **Baltimore Regional Fair Housing Group**

In the wake of HUD's 1995 regulation requiring a new Analysis of Impediments to Fair Housing Choice (AI, what became this document), HUD entitlement jurisdictions in the Baltimore area came together to form the Baltimore Regional Fair Housing Group. As part of carrying out their newly clarified duty to affirmatively further fair housing under the federal Fair Housing Act, they created one of the first Regional Analyses of Impediments to Fair Housing Choice (AIs) in the nation and have coordinated regionally on that duty ever since.

The Fair Housing Group includes housing and community development officials from the cities of Annapolis and Baltimore, as well as Anne Arundel, Baltimore, Harford, and Howard Counties. It also includes leaders from public housing authorities in each of those jurisdictions.

At the request of these jurisdictions, BMC requested funding for a housing policy coordinator as part of successfully applying for a HUD Sustainable Communities grant in 2011. Since filling that position in 2012, participating jurisdictions have helped support it with their own funding, increasing that support to sustain the position after the original HUD grant expired in 2015. This BMC staff position assists the Fair Housing Group in coordinating implementation of its regional fair housing plans and helps participating jurisdictions report regional progress through local government Consolidated Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs).

### **City of Annapolis Human Relations Commission**

The city's Human Relations Commission has statutory authority to investigate housing complaints brought under the city's ordinance. Complaints brought under the city's ordinance are rare; the Commission did not receive any fair housing complaints during fiscal year 2023.

As such, the primary focus of the Commission is education and outreach on fair housing laws and challenges annually to real estate professionals and landlords and property managers and utilizes local law students to conduct outreach to residents.

## **Anne Arundel County Human Relations Commission**

The 11-member Anne Arundel County Human Relations Commission exists to:

- Receive, mediate, and adjudicate complaints of discrimination in housing;
- Initiate and investigate matters relating to discrimination in housing;
- Provide mediation services;
- Conduct public hearings;
- Provide training and seminars in human relations;
- Conduct educational programs;
- Collect, research, assemble, analyze, and disseminate data and educational materials to assist in the elimination of discrimination;
- Make recommendations to the County Executive, the County Council, and County departments and offices on matters involving human relations, including housing discrimination, prejudice, and intergroup relations;
- Suggest proposed legislation to the County Executive or the County Council; and
- Cooperate with federal, state, and local commissions, agencies, organizations, and groups.

The Commission is mostly an advisory group for city staff and leadership. They are also committed to improving citizen knowledge and awareness of fair housing laws, as well as building support for equality of opportunity within the county.

The county now enforces fair housing violations brought under the new county ordinance; prior to this, complaints received by the commission were referred to the state.

## **Baltimore City Community Relations Commission**

The Baltimore City Community Relations Commission (CRC) which is one the two divisions in the Office of Equity and Civil Rights, is the City Agency that investigates claims of discrimination and assists people who have been discriminated against in employment, public accommodation, housing, education, and health and welfare services. CRC enforces article 4 which prohibit discrimination based on race, color, religion, national origin, age, ancestry, sex, physical or mental disability, sexual orientation, gender identity and expression, or marital status is illegal in the City of Baltimore.

## **Baltimore County Human Relations Commission**

The Baltimore County Human Relations Commission (BCHRC) is composed of an Executive Director and 15 members who are appointed by the County Executive to serve a two-year term. BCHRC enforces the County's antidiscrimination law, Article 29 of the Baltimore County Code, 2003. To serve residents of the County, BCHRC provides the following

services: assist residents who believe they have experienced discrimination, offer mediation services, solicit community input through surveys and community engagement events, host and cosponsor events that promote harmony and resolve human relations issues, recognize outstanding individuals and organizations that exemplify the principles of anti-bias and antidiscrimination.

## **Harford County Human Relations Commission**

The Harford County Human Relations Commission is a group of 15 volunteer citizens dedicated to alleviating social problems and promoting equality, understanding, and harmonious relations between the citizens of the county. The County Executive or the council may refer to the commission for review and recommendation, any matters related to the commission's functions and duties. The authority of the Commission is not equivalent to the federal law in that it does not include religion as a protected class. Citizens in Harford County can still file complaints with the Maryland Commission on Civil Rights. Citizens may file discrimination complaints locally with the Human Relations Commission Coordinator.

## **Howard County Human Rights Commission**

Established in 1975 by the County Executive and County Council, the Office of Human Rights (OHR) functions pursuant to the Howard County Code, Section 12.200-12.218 and enforces the Howard County Human Rights Law.

Staff also conduct fair housing outreach and education activities and make a point to “go into the community” to conduct training rather than ask residents to come to county offices.

## **Fiscal Year 2023 (FY23) Inquiries and Enforcement**

One effort the Enforcement Working group undertook was to try to standardize information on fair housing inquiries and enforcement processes across the Maryland Commission on Civil Rights (MCCR) and local enforcement agencies and commissions. An initial result is shown in the table below. One can see that most of the fair housing enforcement in the private real estate market in the jurisdictions participating in this study is carried out by MCCR. The hope is that having comparable information across agencies will help jurisdictions pursue goals that result in the most robust fair housing enforcement possible in the Baltimore metropolitan area.

## Fair Housing Inquiries and Enforcement in Fair Housing Jurisdictions by Receiving Agency, FY2023

Protected Class	MD Commission on Civil Rights (MCCR)	Counties				Cities	
		Anne Arundel HRC	Baltimore County HRC	Harford County HRC	Howard County Office of Human Rights & Equity	Annapolis HRC	Baltimore City Office of Equity & Civil Rights
Total Fair Housing Inquiries Received	98	10	29**	0	15	0	40
Total Fair Housing Charges (Docketed Complaints)*	56		0	0	4	0	1
Color	0				1		
Disability	152				1		1
Familial Status	9						
National Origin	12				1		2
Race	32				1		
Religion	4						2
Sex	14						2
Retaliation	19						
Gender Identity	0						
Marital Status	1						
Sexual Orientation	1						
Source of Income	34				3		1
Other Locally Protected Class	60				3		
<b>Investigation Results</b>							
Probable Cause	0		0	0	0	0	1
No Probable Cause	35		0	0	2	0	1
<b>Resolutions</b>							
Agency Dismissal due to No Probable Cause Finding	35		0	0	2	0	0
Successful Conciliation/Settlement Reached	1		0	0	1	0	0
Voluntarily Withdrawn by Complainant	0		0	0		0	0
Administratively Closed by Agency	1		0	0	1	0	0
Monetary Relief Secured***	\$228,518	\$0	\$0	\$0	\$0	\$0	\$0

\* One person's overall charge can include more than one enumerated charge, even in the same category (e.g., disability). In this case, some complaints include multiple disability charges.

\*\* Includes complaints that were resolved or referred to MCCR.

\*\*\* MCCR relief figure is statewide, not just the Baltimore region.

## Local Organizations

**Economic Action Maryland.** When Baltimore Neighborhoods, Inc. (BNI) closed in 2018, ending nearly 60 years of matched paired housing testing, trainings, and investigations, advocates mobilized to save that function in Maryland. First reconstituted with a new Board of Directors in 2019 as the Fair Housing Action Center of Maryland, the new organization was soon brought under the umbrella of the Maryland Consumer Rights Coalition, which then rebranded as Economic Action Maryland. As Economic Action worked to rebuild BNI's testing operation, they brought to the Fair Housing Group's attention the fact that Maryland is one of 11 states that prohibits testers from recording interactions with property owner, managers, and lenders – a restriction that greatly hinders fair housing enforcement. They have been leading efforts in the General Assembly to allow an exception in Maryland's recording law for fair housing tests.

**Disability Rights Maryland (DRM)** is the State's designated Protection & Advocacy (P&A) agency and a member of the National Disability Rights Network (NDRN). As such, DRM is statutorily authorized to conduct investigations of suspected abuse and neglect of individuals with disabilities in facilities within the State of Maryland. DRM plays a significant role in representing persons with disabilities on matters involving segregation, housing discrimination, refusal to make reasonable accommodations, improving accessibility in housing, and developing more accessible and affordable housing. The Bailey Consent Decree, described below, was brought by DRM and resulted in the development of hundreds of new, accessible affordable housing units within Baltimore County and establishment of a modification fund to assist resident to make necessary improvements, such as installation of ramps, modifications in bathrooms and kitchens and others to ensure persons with disabilities can have full use and enjoy housing units in areas of opportunity.



## Fair Housing Cases

There have been a number of high-profile fair housing complaints and cases that have been brought that have directly and indirectly impacted the Baltimore Region. Favorable decisions under the Fair Housing laws for plaintiffs were granted in all of the legal and administrative challenges that occurred within this period. These fair housing enforcement activities provide the context for assessing progress and impediments within the Baltimore Region.

### Thompson v. HUD

**Summary of facts.** On November 20, 2012, the U.S. District Court of Maryland granted final approval of a settlement of the *Thompson v. HUD* fair housing case, which was filed in 1995 by then-current and former African American public housing residents against the Department of Housing and Urban Development (HUD), the Housing Authority of Baltimore City (HABC), and the City of Baltimore. These plaintiffs were represented by the American Civil Liberties Union (ACLU) and asserted that HABC and HUD sited public housing exclusively in racially concentrated impoverished neighborhoods, which perpetuated racial segregation and violated the Fair Housing Act.

In 1996, a partial consent decree (“PCD”) was entered that allowed the City and HABC to raze high rise public housing developments, to redevelop them into HOPE VI mixed income developments. In order to do that, however, Baltimore City and HABC were required – and funded by HUD – to build off-site housing in low-poverty, non-racially-concentrated areas and to create a new regional housing mobility program using additional HUD-awarded Housing Choice Vouchers. That program became known as the Baltimore Housing Mobility Program.

**Settlement terms and conditions.** The fair housing issues unresolved by the PCD were tried in December 2003. HUD was found liable for its failure to Affirmatively Further Fair Housing. The City and HABC were not found liable. The 2012 settlement agreement that was approved by the U.S. District Court expanded the existing regional housing mobility program from 1,800 to nearly 4,400 vouchers by the end of 2018 and provided new financial incentives for the construction of deeply affordable homes in areas of opportunity. The settlement also created the nonprofit organization Baltimore Regional Housing Partnership to administer those vouchers and incentives.

### Baltimore County NAACP et. al. v. Baltimore County

**Summary of Facts.** The complainants—the Baltimore County chapter of the NAACP, Baltimore Neighborhoods, Inc., and three named Housing Choice Voucher clients—alleged in a 2011 complaint that the policies and practices of the Housing Office and county housing policies in general violated provisions of federal law, including, but not limited to, the Fair Housing Act and the Americans with Disabilities Act. The alleged primary impediment was the lack of affordable and affordable, accessible rental housing for

families in areas that are not racially impacted. The County and the complainants agreed to engage in conciliation with HUD and then spent the next four-plus years in negotiations.

**Settlement Terms and Conditions:** On March 9, 2016, HUD, the complainants, and Baltimore County executed an agreement that included the following commitments:

1. The County will take all necessary steps to cause private developers to develop 1,000 homes affordable to families earning 60 percent or 30 percent of area median income in particular higher opportunity Census tracts in the County, with deed restrictions providing for 15 years of affordability.
2. The County will also operate a Mobility Counseling Program whose aim is to offer expanded housing opportunities to families to avoid clustering voucher and other rental assistance users in segregated or low income areas. Within 10 years, the County must locate 2,000 families into certain defined Census tracts, assisting them with mobility counseling and using a new Modification Fund to pay for reasonable accommodations.
3. The County must introduce Source of Income Legislation repeatedly until passed. The Baltimore County Council approved this legislation in November 2019, and the Maryland General Assembly approved statewide legislation in 2020.
4. The County Office of Housing will establish a "Reasonable Accommodations Coordinator" position to coordinate and oversee outreach, training, and technical assistance to program participants and landlords participating in the Housing Choice Voucher Program.

Baltimore County is still working to complete its obligations under this voluntary conciliation agreement. Additional information can be found on the Baltimore County Government website at

<https://www.baltimorecountymd.gov/Agencies/planning/fairhousing/hudconciliation.html>

## **Baltimore Regional Housing Campaign v. State of Maryland**

**Summary of facts.** The Baltimore Regional Housing Campaign resolved a fair housing complaint against the State of Maryland's Department of Housing and Community Development (DHCD) for allegedly perpetuating segregation under its Qualified Allocation Plan (QAP). The Baltimore Regional Housing Campaign is a Baltimore-based nonprofit coalition comprised of the Citizens Planning and Housing Association, Baltimore Regional Initiative Demanding Genuine Equality (BRIDGE), the Greater Baltimore Urban League, Innovative Housing Institute, Poverty & Race Research Action Council, and the American Civil Liberties Union.

The crux of the complaint is that the state of Maryland passed legislation that required local approval of Low-Income-Housing Tax Credit projects as part of its QAP application

process. The suit asserted that the local approval requirement was a pocket veto that restricted the affordable housing development in areas of opportunities and perpetuated racial segregation through the LIHTC program.

**Settlement terms and conditions.** On September 28, 2017, HUD facilitated the resolution of this complaint by the execution of a Voluntary Conciliation Agreement with the complainants and Maryland DHCD. That agreement states:

1. DHCD will not reinstate Local Approval requirement (which had been removed by State legislation in 2014) or any related scoring incentive in the QAP and its regulations unless required by law.
2. Family Housing in Communities of Opportunity will continue to be eligible for the basis boost, without the need for prior approval from DHCD, as provided in the 2016 QAP Section E.3.
3. DHCD will ensure that no fewer than 1,500 units of Family Housing that are financed, in whole or in part with LIHTC, are developed in Communities of Opportunity within the Baltimore Region, of which no fewer than 1,050 units will be net new construction units.
4. DHCD will revise its scoring criteria in Section 4.3 of the Guide for Transit Oriented Development ("TOD") to award the full complement (currently 8) of TOD points to any Family Housing proposal in a Community of Opportunity.
5. Amend plans to now award points to any proposal to develop family housing in a community of opportunity (including providing more of an incentive for homes with two or more bedrooms).
6. Expand affirmative fair housing marketing activities.
7. Pay \$225,000 to promote the mission of the local fair housing groups.

As of the end of 2022, enough Maryland DHCD-financed developments had closed on their financing to complete the housing production portion of this voluntary conciliation agreement.

## **Bailey Supplemental Consent Decree**

**Summary of facts.** On October 30, 2015, U.S. District Judge J. Frederick Motz of the District of Maryland approved a supplemental consent decree between the United States, the Maryland Disability Law Center (now Disability Rights Maryland), and the Housing Authority of Baltimore City (HABC). It continued and amended certain terms in the original consent order in *United States v. HABC*, and *Bailey v. HABC*, entered on Dec. 20, 2004. The original consent decree contained terms and conditions aimed at providing accessible

housing to persons with disabilities, including non-elderly persons with disabilities, who were allegedly discriminated against by HABC.

**Settlement terms and conditions.** The original consent decree mandated that HABC create 756 units to comply with federal accessibility standards, 500 project-based voucher units for non-elderly persons with disabilities, and 100 new housing opportunities for non-elderly persons with disabilities called “Long Term Affordable” units.

Under the supplemental decree, HABC was required to complete the creation of the outstanding units. In addition, because HABC had transferred a number of its public housing properties to new owners under the Rental Assistance Demonstration (RAD), the Supplemental Decree included the requirement to occupy the units from HABC’s waitlists, preserve the accessibility of the units, and implement the policies and practices that protect the rights of tenants with disabilities.

## **City of Baltimore v. Wells Fargo Bank**

**Summary of facts.** On July 12, 2012, U.S. District Court Judge John D. Bates District of Columbia approved a settlement between the City of Baltimore and Wells Fargo to resolve a landmark fair lending lawsuit against Wells Fargo, and concurrently with the United States Department of Justice, that resulted in a national fair lending settlement with Wells Fargo worth at least \$175 million.

In its complaint, the City of Baltimore asserted that Wells Fargo intentionally targeted predatory mortgage lending practices at the City's minority communities. African American borrowers were steered to and offered abusive and exploitive subprime loans in violation of the Fair Housing Act.

**Settlement terms and conditions.** Under its agreement with the City, Wells Fargo agreed to provide \$4.5 million in direct down payment assistance to qualifying Baltimore homebuyers, an additional \$3 million for the City to use for priority housing and foreclosure-related initiatives, and \$425 million in prime mortgage loans in Baltimore over five years, including \$125 million in low and moderate income neighborhoods.

Under the Justice Department's national settlement, Wells Fargo agreed pay at least \$125 million in compensation to minority borrowers who were overcharged or steered into subprime loans, including borrowers located in Baltimore City. More than 1,000 Baltimore borrowers are expected to receive an average award of \$15,000 for being improperly steered into a subprime loan and an additional \$50 million for down payment assistance to borrowers in eight metropolitan areas, including Baltimore.

On May 15, 2018, Wells Fargo committed \$500,000 over five years to help Jubilee Baltimore implement the Central Baltimore Partnership's plan for revitalizing six city neighborhoods.

The six neighborhoods are Charles North, Greenmount West, Barclay, Old Goucher, Remington, Charles Village and Harwood<sup>47</sup>.

### **Fannie Mae Settlement Funds Come to Baltimore**

Three Baltimore nonprofits will receive funding as part of a settlement between the National Fair Housing Alliance and Fannie Mae that provides \$8.3 million (\$185,000 to each metropolitan area in the lawsuit) to promote stable, healthy, and viable communities. The settlement funding established the Inclusive Communities Fund that will be used for:

- Downpayment assistance,
- Financial literacy and credit counseling programs,
- Implementation of Special Purpose Credit Programs,
- Increasing homeownership supply in Black and Latino communities,
- Credit expansion through more affordable mortgage products,
- Repurposing vacant lots,
- Foreclosure prevention,
- Addressing title and heirs property issues, and
- Providing repairs for existing homeowners.

### **Complaint against City of Baltimore Regarding Poppleton Redevelopment**

In February 2023, a complaint was filed by Economic Action Maryland against the City of Baltimore alleging fair housing violations for displacement of residents of the Poppleton community into more segregated parts of Baltimore City and out of the city entirely. The lawsuit was still outstanding at the time of this report.

### **Lawsuits against City of Annapolis and Housing Authority**

Since 2019, a series of three lawsuits have been filed by attorney Joe Donohue of The Donohue Law Firm against the City of Annapolis, with two also including the Housing Authority of the City of Annapolis (HACA). The parties settled one of the lawsuits, and the two others are pending.

### **White et al v. City of Annapolis and Housing Authority of the City of Annapolis**

In June 2019, 10 plaintiffs – ultimately growing to 52 residents of properties owned by the Housing Authority of the City of Annapolis, filed a complaint alleging that:

- 1) The City and Housing Authority have forgone their statutory obligation to inspect and license the leased properties owned by the Housing Authority;

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<sup>47</sup> <https://www.bizjournals.com/baltimore/news/2018/05/16/wells-fargo-provides-500-000-grant-for-baltimore.html>

- 2) The housing authority has a long-standing pattern and practice of preventing African American and other Black persons from residing in predominantly White communities in Annapolis, which furthers racial segregation; and
- 3) Through these actions, the City and Housing Authority have perpetuated violations of the Plaintiff's rights under the Fair Housing Act, as amended.

The complaint alleges that the City has failed to evenly enforce its code by not licensing or inspecting the Housing Authority properties, and that these are the only rental properties within the city that are neither licensed nor inspected. The complaint further alleges that this lack of action is in violation of the state Maryland Housing and Community Development Code, which requires that all housing projects of an authority are subject to local land use, health, and safety laws. The complaint also alleges that the failure to inspect the Housing Authority properties is a violation of the City's duty to affirmatively further fair housing, a condition for receiving federal community development block grant funds.

The complaint resulted in a consent decree that requires:<sup>48</sup>

- Fair housing education and training for all current and new employees;
- Property inspections performed by the City of Annapolis licensing;
- Parameters for unit condition repairs and relocation of residents when repairs are made;
- Aggressive negotiation with the county and state for financing to redevelop properties;
- Development of 790 new units;
- Parameters for current tenants of public housing to return to their properties of choice after redevelopment;
- Adoption of a new Reasonable Accommodation Policy; and
- Conditions for future redevelopment of properties.

The parties settled the lawsuit in 2020, without any party admitting fault. The plaintiffs and their attorneys received a total of \$1.8 million, with \$900,000 coming from the City of Annapolis and the other \$900,000 coming from the Housing Authority. Each of the 52 plaintiffs received about \$17,000.

**Fisher v. City of Annapolis and HACA.** In May 2021, representatives of the estate of DaMon R. Fisher sued the City of Annapolis and Housing Authority (HACA) of the City of Annapolis, alleging that the City did not hold HACA properties to the same standard as privately owned rental properties in Annapolis and that mold in Fisher's HACA

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<sup>48</sup> [https://irp.cdn-website.com/6a704789/files/uploaded/White\\_v.\\_HACA\\_Consent\\_decree\\_report\\_07.15.2024\\_-\\_Final.pdf](https://irp.cdn-website.com/6a704789/files/uploaded/White_v._HACA_Consent_decree_report_07.15.2024_-_Final.pdf)



apartment exacerbated his severe asthma and resulted in his 2021 death. The City and HACA have denied wrongdoing, and the case is still pending.

**Johnson & Holliday v. City of Annapolis.** Also in May 2021, four days after the filing of the Fisher lawsuit, two more residents of HACA properties filed a class action lawsuit against the City of Annapolis alleging the same City failure to properly enforce its housing code for HACA properties, thus discriminating against the predominantly African American HACA residents. The lawsuit states that it seeks to bring similar compensation to the approximately 1,600 HACA residents who were not party to the White case above.

After a federal judge declined to dismiss the case, the City of Annapolis sued HACA and HUD, trying to bring them into the lawsuit as well. In February 2023, the judge granted class action status to the lawsuit. It is currently pending.

**Connolly v. Lanham.** This case did not involve a housing provider or jurisdiction in the region, and instead was brought by City of Baltimore residents. The lawsuit was filed by Nathan Connolly and Shani Mott, a Black couple and Johns Hopkins professors. The couple alleged that when they applied to a lender for mortgage refinancing on their home, which is located in an affluent white neighborhood in Baltimore, the defendants “dramatically undervalu[ed] the property because of their race and because the house was adjacent to a Black census block.” When the plaintiffs removed any indications that they were Black from their house and had the house re-appraised, a second appraiser appraised it at a value that was \$300,000 higher than the first appraisal. The case was settled, requiring that the defendant (loanDepot) implement comprehensive policies and practices for applicants to obtain reconsideration of an appraisal if they believe it is flawed. The company will conduct analyses of appraisals and requests for reconsideration to identify any possible discrimination. loanDepot employees will attend training on appraisal discrimination. loanDepot has also agreed to a monetary payment.

Even prior to this instance of appraisal bias coming to light in August 2022, the 2022 General Assembly had passed legislation establishing a Task Force on Property Appraisal and Valuation Equity. The task force just released its final report in November 2024:

<https://dhcd.maryland.gov/Residents/Pages/AppraisalGapTaskForce.aspx>.

## SECTION X.

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### FAIR HOUSING GOALS AND PRIORITIES

## **SECTION X.**

# **Fair Housing Goals and Priorities**

This section contains the action items that the jurisdictions and housing authorities participating in the updated Analysis of Impediments to Fair Housing Choice (AI) will undertake in the next 5 years to address barriers to housing choice both locally and regionally.

The jurisdictions will continue to work closely with the Baltimore Metropolitan Council (BMC) to coordinate action items and strengthen the collective regional capacity to improve housing options and choice for residents, carrying out the statutory duty at both the federal and state levels to affirmatively further the goals of our fair housing laws.

## Regional Fair Housing Action Plan

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>Enhance regional fair housing capacity</b>				
1	<b>Continue to support housing policy coordination staffing at BMC to coordinate the implementation of this action plan AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).</b>	Resources for regional coordination of commitments to affirmatively furthering fair housing choice	Local jurisdictions, BMC	Jurisdictions continue their contributions to BMC regional coordination, including increases for inflation. In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.
2	<b>BMC continue to convene local and State housing agencies with housing practitioners and advocates through BMC's Housing Committee to review progress on implementing these regional action steps and strategize on further action.</b>	Need for regional cooperation and stakeholder involvement in carrying out commitments to affirmatively furthering fair housing choice	BMC, Chair of Fair Housing Group	BMC and Fair Housing Group Chair to convene BMC Housing Committee quarterly or as needed on an ongoing basis.
<b>Increase and preserve quality rental housing options, including in high opportunity areas</b>				
3	<b>Sustain the Baltimore Regional Project-Based Voucher (PBV) Program, including (a) public housing authorities (PHAs) continuing to fund central coordination, (b) identifying new funding for ongoing mobility counseling, and (c) contributing additional vouchers as appropriate.</b>	Disparities in access to opportunity; location & type of affordable housing; resources for regional coordination of commitments to affirmatively furthering fair housing choice	PHAs, BRHP, local jurisdictions, & BMC	PHAs and BRHP continue to contribute toward BMC coordination of Regional PBV Program beginning, including annual increases for inflation. PHAs and local jurisdictions also work together and with BMC to identify new funding for mobility counseling by fiscal year 2026. Following that, set goals for PBV awards and production through FY30.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
4	<p><b>Continue to urge the Maryland Department of Housing and Community Development (DHCD) to adjust its 9% Low Income Housing Tax Credit (LIHTC) scoring so that:</b></p> <p>a. DHCD awards half of 9% LIHTC in the Baltimore metropolitan area, reflecting the Baltimore area's proportion of the State's low income population.</p> <p>b. Of those Baltimore-area awards, 65% support developments open to families in opportunity areas in order to address past inequities.</p> <p>c. With the remaining 35% contributing to comprehensive revitalization strategies, including HUD-designated Choice Neighborhoods.</p>	Disparities in access to opportunity; location and type of affordable housing; siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plan and other programs	BMC, local jurisdictions and PHAs	BMC compiles analysis of DHCD LIHTC awards each year and coordinates Fair Housing Group regional comments to DHCD when DHCD asks for input. Monitor progress toward goals as 9% LIHTC are awarded. Chairs of Fair Housing Group and PHA group help lead effort to compile regional comments to influence 9% scoring in Qualified Allocation Plan.
5	<b>Continue to convene Regional Preservation Task Force quarterly or as needed to address identified affordability preservation priority issues.</b>	Loss of affordable housing	BMC, legal jurisdictions, PHAs	Use Task Force and Housing Committee to set priorities for preservation, such Low Income Housing Tax Credit properties reaching the end of their Extended Use Agreements, vulnerability of nonprofit-owned housing for people with disabilities, and watchdogging the enforcement of the Maryland Assisted Housing Preservation Act (MAHPA) and Low Income Housing Preservation and Resident Homeownership Act (LIHPRA) regarding federally subsidized properties.
6	<b>Every jurisdiction requires health &amp; safety inspections and rental licensing and makes that information readily accessible.</b>	Disproportionate rental status, housing burden, and risk of eviction among people of color; deteriorated properties	Local jurisdictions	Complete a review of local rental licensing laws and, if appropriate, amend to ensure all rental properties are included. Create and post a clear process for determining whether a rental property is licensed and allowing for immediate printing of the license and licensing history.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
7	Every jurisdiction makes clear to renters what rental property maintenance codes require, how to report problems, and makes inspection reports immediately available.	Disproportionate rental status, housing burden, and risk of eviction among people of color; deteriorated properties	Local jurisdictions	Create and make available a clear "Minimum Livability Standards List" with maintenance requirements for residential rental properties. Review local websites to ensure the process for reporting maintenance problems with rental properties is clear, easy to find, and transparent. Review policies regarding inspection reports and, if necessary, modify policies to ensure that property inspection reports are promptly shared with tenants as a matter of routine.
8	Connect with Maryland's new Office of Tenant and Landlord Affairs to facilitate communication and referrals for housing code enforcement and any available help with landlord-tenant issues.	Disproportionate rental status, housing burden, and risk of eviction among people of color	Local Jurisdictions, BMC	Convene a fiscal year 2026 conversation and any needed follow-up to ensure effective communication and referrals between the Maryland Office of Tenant and Landlord Affairs and Regional Fair Housing Group jurisdictions.
	Address racial homeownership disparities			
9	Ensure that the following information, as practicable, is easily accessible from BMC and local government websites: <ul style="list-style-type: none"> <li>* Special Purpose Credit Programs available in the jurisdiction/region</li> <li>* State &amp; local down payment assistance programs</li> <li>* First-time homebuyer success stories</li> <li>* Homeownership counseling programs in the jurisdiction/region</li> <li>* Bank incentives/programs for first-time/lower-income homebuyers.</li> </ul>	Disparities in homeownership rates; access to financial services	BMC, local jurisdictions	BMC and local governments collaborate to make as much of this information as possible readily available online by fiscal year 2028.
10	Carry out any appropriate local government role in recommendations of the Maryland Task Force on Property Appraisal and Valuation Equity.	Disparities in homeownership rates; private discrimination	BMC, local jurisdictions	Review Task Force report when released; create more specific action item and metrics.



ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
11	<p>Convene planning and housing directors every six months to explore the most workable ways to address the estimated shortage of more than 32,000 habitable homes in the Baltimore metropolitan area as of 2022. Options for joint inquiry and action could include:</p> <ul style="list-style-type: none"> <li>* Data on school-related adequate public facilities ordinances (APFOs) and ways it could potentially be used to engage the public and explore alternatives to residential building moratoria, as Montgomery County did</li> <li>* Possible impact, or ways to potentially measure impact moving forward, of recent and proposed land use and APFO changes on housing production.</li> <li>* Reforms such as: <ul style="list-style-type: none"> <li>- Allowing duplexes, triplexes, and quadplexes in zones where only single-family detached homes are currently allowed.</li> <li>- Allowing and facilitating the development of accessory dwelling units, considering the 2024 report of the Maryland Accessory Dwelling Unit Policy Task Force.</li> <li>- Allowing multifamily homes in more areas, paying special attention to job centers, high opportunity areas, and areas well-served by transit.</li> <li>- Revisions to water &amp; sewer service areas/priority funding areas in light of housing shortage and metropolitan patterns of racial segregation.</li> <li>- Streamlining permitting and approval processes.</li> </ul> </li> <li>* Impact of Baltimore City's plan to rehabilitate vacant homes at scale into attractive, habitable homes, especially for wealth-building homeownership.</li> <li>* Other obstacles to residential development in areas where it is currently allowed</li> <li>* Setting goals by jurisdiction for increased home construction and zoned residential capacity.</li> </ul>	Disparities in homeownership rates; land use and zoning laws; lack of access to opportunity due to high housing costs.	Local jurisdictions, BMC.	BMC convenes planning directors starting in fiscal year 2026, and that group establishes priorities for exploration, possible data gathering and analysis, and joining action, considering capacity at BMC and at local and State governments.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Address barriers to equalizing access to opportunity</b>			
12	<b>Support State funding for:</b> <ul style="list-style-type: none"> <li>* Baltimore City's plan to rehabilitate vacant homes at scale into attractive, habitable homes, especially for wealth-building homeownership.</li> <li>* Building the Red Line light rail line.</li> <li>* The Blueprint for Maryland's Future</li> </ul>	Disparities in access to opportunity; deteriorated and abandoned properties; need for significant investment in particular neighborhoods	Local jurisdictions, BMC	Local governments, coordinated by BMC, submit letter to governor and/or State legislators at appropriate time supporting these programs to bring investment and educational and economic opportunity to the racially/economically concentrated areas of poverty (R/ECAPs) and other disinvested communities primarily in Baltimore City, but also surrounding areas.
13	<b>Support improved public transit access, including for persons with disabilities, to suburban job centers and opportunity areas with multifamily housing.</b>	Disparities in car ownership; availability, type, frequency, and reliability of public transportation; location of employers	Local jurisdictions, BMC	BMC to keep jurisdictions and PHAs updated on opportunities for MTA service improvements. Local governments and PHAs take opportunities to support possible improvements through comments or joint letters.
14	<b>Support necessary State incentives for the Maryland Low Income Housing Tax Credit (LIHTC) program to help make HUD-designated Choice Neighborhoods redevelopment of distressed public housing successful.</b>	Need for community revitalization strategies, need for private and public investments in specific neighborhoods, including services or amenities	Local jurisdictions, PHAs, BMC	BMC coordinates Fair Housing Group regional comments to DHCD when DHCD asks for input. Chairs of Fair Housing Group and PHA group help lead effort to compile regional comments to influence 9% scoring in Qualified Allocation Plan.
15	<b>Update PHA portability educational booklet, and continue to distribute booklet and show video in all Housing Choice Voucher briefings.</b>	Disparities in access to opportunity; potential impediments to portability	PHAs, BMC	BMC to coordinate updates to portability education booklet by fiscal year 2026. Distribution of booklet and showing of video at voucher briefings ongoing.
16	<b>Submit a multi-PHA application for any future HUD tenant-based mobility counseling resources that become available.</b>	Disparities in access to opportunity	PHAs, BMC	Review any HUD NOFA when it is issued and work with BMC to prepare an application.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
17	Continue to analyze Maryland DHCD's LIHTC occupancy data to ensure that people of color, people with disabilities, and HCV holders are able to access communities of opportunity. Conduct any necessary affirmative marketing outreach and/or training.	Lack of data to inform fair housing evaluation and decision-making	BMC, local jurisdictions	BMC to request and analyze Maryland DHCD data required by the Housing and Economic Recovery Act (HERA) of 2008 as frequently as possible. Local governments and BMC to conduct appropriate affirmative marketing training based on data.
18	Continue to use State-required referral MOUs, particularly for LIHTC developments in COOs, to help HCV holders access those developments.	Disparities in access to opportunity	PHAs, Baltimore Regional Housing Partnership, BMC	PHAs and BRHP use Fair Housing Group MOU template to facilitate referrals to LIHTC developments; BMC facilitate communication on MOUs and monitor implementation.
Expand fair housing resources and compliance				
19	Provide optimally effective fair housing information at HCV participant briefings.	Private discrimination, source of income discrimination	PHAs, BMC, private fair housing organizations	Convene a fiscal year 2026 conversation between PHAs and private fair housing organizations to see if more effective fair housing information could be presented to new HCV participants at their voucher briefings. If so, implement changes by FY27.
20	Encourage housing counseling agencies to include bolstered fair housing information - potentially including a video - as part of housing counseling.	Private discrimination, lending discrimination	Local jurisdictions, BMC	By FY 2026 convene a conversation with area housing counseling agencies to determine the best form to deliver fair housing information to homebuyers as part of the counseling process. Implement result by FY27.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
21	<p><b>Expand fair housing training for property owners and managers to include:</b></p> <ul style="list-style-type: none"> <li>* PHA partners, such as property owners in HCV, PBV, and Rental Assistance Demonstration (RAD) programs.</li> <li>* Recipients of local government HOME funds, Payments in Lieu of Taxes (PILOTs), and other affordable housing resources.</li> <li>* Property owners and managers generally</li> </ul>	Private discrimination, source of income discrimination.	Local jurisdictions, PHAs, BMC, private fair housing organizations.	Consult private fair housing organizations in FY26 on most effective trainings for relevant property owners and managers and implement trainings by FY27.
22	<b>Report annually and regionally on fair housing inquiries and docketed complaints by protected class, as well as outcomes, including financial compensation. Use results to assess needs for additional public education or other needed changes.</b>	Private discrimination, need for local public fair housing enforcement.	Local civil rights agencies, BMC	Continuing from 2025 Regional AI, BMC continue to compile data from local civil rights agencies and Md. Commission on Civil Rights. BMC convene conversation at least annually to discuss significance of data and any additional needed public education and/or other changes.
23	<b>Convene conversations with the Maryland Commission on Civil Rights (MCCR) and local fair housing enforcement agencies on the complaint process in order to identify any barriers and opportunities for improvement.</b>	Private discrimination, need for public fair housing enforcement	Local civil rights agencies, BMC, MCCR	Begin convening conversations by FY 2026. Implement any findings/recommendations by FY 2028.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
24	<b>Coordinating regionally, set robust fair housing paired testing goals in each jurisdiction and track enforcement outcomes to establish an effective regional deterrent to illegal housing discrimination.</b>	Private discrimination, source of income discrimination, lending discrimination, need for private and public fair housing enforcement	Local jurisdictions, BMC	By FY 2027 set fair housing paired testing goals by jurisdiction. Monitor progress in FY28 and afterwards
25	<b>Work with fair housing advocates to support a change to Maryland law to allow audio recording of fair housing tests.</b>	Private discrimination, need for private and public fair housing enforcement.	Local jurisdictions, PHAs	Jurisdictions and PHAs testify in favor of legislative change each General Assembly until reform is passed.
26	<b>Conduct a training for local government and public housing authority officials on the duty to affirmatively further fair housing following each State election cycle.</b>	Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice	BMC, local jurisdictions	BMC and Fair Housing Group to coordinate training in 2027.

## City of Annapolis Fair Housing Action Plan

ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Enhance fair housing resources and compliance</b>			
1	<b>Overall goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.</b>	Need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households	Human Relations Commission/ Dept. of Human Resources	
	<b>Continue to make available and distribute literature and informational material, in English and Spanish, concerning fair housing issues, an individual's rights, and landlord's responsibilities to affirmatively further fair housing.</b>	<ul style="list-style-type: none"> <li>▪ Lack of education and increasing awareness regarding fair housing.</li> <li>▪ Lack of outreach to protected classes and referral to assistance.</li> </ul>	Human Relations Commission/ Dept. of Human Resources/ Community Development Division	Create fair housing speakers bureau to conduct outreach with organizations serving the protected classes and low income individuals by June 30, 2025
	<b>Improve information on the Annapolis Fair Housing Law given to landlords participating in the city's rental license program</b>	Lack of knowledge/awareness and willingness to comply with fair housing laws	Department of Planning and Zoning/Licenses and Permits	Prepare and disseminate a Fair Housing Brochure for landlords by December 31, 2020
	<b>Improve language access for the city's non-English speakers, particularly the Latino and Hispanic community</b>	Lack of meaningful language access	Office of the Mayor	Develop a Limited English Proficiency Plan (LEP) and implement recommendations from the LEP Plan by December 31, 2022



ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Improve voucher holders' knowledge of the Source of Income protection in fair housing law.	Source of income discrimination	Department of Planning and Zoning/ Community Development Division/HACA	Develop a Handbook for Housing Voucher holders on Source of Income Discrimination in Housing by December 31, 2023
	<b>Expand fair housing choice for persons with disabilities</b>			
2	Overall goal: Revise the City Zoning Code to affirmatively further fair housing.	<ul style="list-style-type: none"> <li>Occupancy codes and restrictions</li> <li>Land use and zoning laws</li> </ul>	Department of Planning and Zoning/ Comprehensive Planning Division	
	Improve the City's regulation of group homes for persons with disabilities so not to impede the creation of group homes, limiting housing choice for the disabled in Annapolis.	Regulatory barriers to providing housing and supportive services for persons with disabilities.	Department of Planning and Zoning/ Comprehensive Planning Division	Planning and Zoning should review the existing ordinances and zoning regulations for compliance with the Fair Housing Act, as amended. Address during the Comprehensive Rezoning Process. By December 31, 2025
	Review regulations to ensure the rules are required to support health and safety without potentially impacting protected classes.	Regulatory barriers to providing housing and supportive services for persons with disabilities.	Department of Planning and Zoning/ Comprehensive Planning Division	Evaluate City Code to incorporate changes in regulations as may be needed to ensure regulations do not negatively impact the health and safety of protected classes by December 31, 2025

ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Increase rental housing options</b>			
3	<b>Overall goal: Promote and encourage the construction and development of additional affordable rental housing units in the area, especially for households whose income is less than 80% of the median income.</b>			
	<b>Support and encourage by providing incentives to both private developers and non-profit housing providers to develop plans for the construction of new affordable and accessible renter-occupied and owner-occupied housing.</b>	Limited opportunities for residential development/lack of developable land and increasing housing prices	Department of Planning and Zoning/ Community Development Division	Develop a policy regarding Payment in Lieu of Taxes (PILOT) and explore other incentives to encourage affordable housing construction by December 31, 2025
	<b>Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter occupied and owner occupied housing that is affordable and accessible to lower income households</b>	Lack of access to opportunity due to high housing costs	Department of Planning and Zoning/ Community Development Division	Continue use of CDBG funds and Housing Assistance Trust Fund for Housing Rehabilitation Program and Buyer Program. Leverage public financing to ensure satisfaction of the greatest need among the protected classes. July 1, 2020 - June 30, 2025
	<b>Increase ownership opportunities for under-represented households</b>			
4	<b>Overall goal: Improve approval rates for all originated home mortgage loans.</b>			
	<b>Credit history is the greatest reason for denial among all races of households. Debt-to-income ratio is the second highest contributor to denials. Work with lenders and provide resources to assist with reduction of the denial of home mortgage applications based on credit history.</b>	<ul style="list-style-type: none"> <li>Disparities in homeownership rates</li> <li>Lending discrimination</li> <li>Access to financial services</li> </ul>	Department of Planning and Zoning/ Community Development Division	Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas. Continue to support Community Action Agency and ACDS Housing Counseling Programs July 1, 2021- June 30, 2025.

## Anne Arundel County Fair Housing Action Plan

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>Expand affordable housing options and opportunities</b>				
1	<b>Invest in the creation of affordable and accessible rental units in Communities of Opportunity, especially in transit zones.</b>	Lack of access to opportunity due to high housing costs	ACDS, Affordable Housing Developers, MD DHCD	Leverage local resources, including HOME and Housing Trust Fund dollars, to subsidize the production of at least 8 new multi-family rental projects in next five years. Develop one demonstration project that leverages market rate unit, as well as public investments, to create affordable units.
2	<b>Invest in the preservation of the existing stock of affordable rental units.</b>	Potential loss of affordable housing in future	ACDS, HCAAC, County Council	Provide affordable financing to preserve the existing stock of affordable rental property. Over next five years, support the redevelopment/preservation of at least 5 existing affordable housing communities. Leverage at least one PILOT award to support preservation in Naturally Occurring Affordable Housing Community (NOAH).
3	<b>Implement the county's new inclusionary housing, MPDU ordinance. Closely monitor the effect of the ordinance and adjust as needed to ensure it creates housing that is distributed in an equitable manner, including in high opportunity areas.</b>	Land use and zoning laws, location and type of affordable housing, lack of access due to high housing costs	Planning and Zoning, ACDS, Office of Law	By FY 2026, implement new MPDU regulations. MPDU developments will be approved by the County, and eligible buyers/renters will be connected with units. MPDU units will increase access for prospective buyers in the ACDS Homeownership Counseling Program, as well as renters seeking affordable units referred by the public housing authority and other partner agencies. The clients referred through these programs are more representative of marginalized communities and protected classes than the County population as a whole.
4	<b>Review opportunities to utilize County Surplus Land for affordable housing development.</b>	Limited development capacity and options	Central Services, Office of Law, ACDS	ACDS and HCAAC will continue to review opportunities for utilizing surplus land.

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
5	Support the continued use of Small Area Fair Market Rents (SAFMRs) for housing choice voucher (HCV) program.	Disparities in Access to Opportunity	Housing Commission of Anne Arundel County	Work with HCAAC to ensure SAFMRs remain in place for the HCV and other voucher programs.
6	Reduce regulatory barriers to affordable housing development.	Disparities in housing challenges; limited development capacity and options	Office of Law, Planning and Zoning, ACDS	Review zoning and development regulations and amend to allow for a variety of residential forms, densities and sizes in stable communities throughout the County. Update the zoning and development codes to create better tools for the type of development that the County wants to promote – redevelopment, adaptive reuse, infill, and mixed-use. By FY 2027, explore the feasibility of a fast track development program for affordable housing developments.
7	Continue and expand resources for case management, housing search assistance and other supportive services to sustainably house low and very low income households.	Lack of resources to support empowerment of residents faced with discrimination; Discrimination in housing choice	Housing Commission, ACDS	The County will invest local funding annually to support case management and housing location support for housing vouchers administered by HCAAC and TBRA programs funded with CoC, HOPWA, HOME and County funds to house hard to serve clients and help them access housing throughout Anne Arundel County. (e.g. Moving Home Program). Provide landlord mitigation resources.
8	Address disparities in homeownership rates by race and ethnicity through housing counseling and downpayment/mortgage assistance, and targeted outreach to protected classes.	Disparities in homeownership	ACDS, Regional Fair Housing Group	Continue to invest County and federal resources into homebuyer and foreclosure prevention counseling as well as the Mortgage Assistance Program. Continue to target protected classes through outreach for participation in County programs.



ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
9	Increase the supply of affordable, accessible homes for both homeownership and rental through acquisition and rehabilitation.	Discrimination in reasonable accommodation requests; Disparate housing challenges for persons with disabilities	ACDS, Office of Equity and Human Rights	During FY 2026, begin to incorporate full ADA units into ACDS portfolio of units that are being developed, while also encouraging development partners to exceed the required number of ADA units in new developments. Maintain a home/apartment accessibility modification program to serve low income homeowners and renters with disabilities.
10	Increase the supply of affordable rental units by leveraging the County's ADU law.	Lack of access to opportunity due to high housing costs	ACDS, Office of Equity and Human Rights	By FY 2027, develop a plan for marketing the opportunities that ADU law provides for homeowners to create additional units.
Address barriers to safe, healthy, and quality rental housing				
11	Create a rental licensing law that is inclusive of single family/scattered site rental units and provides some transparency to the public.	Disproportionate rental status, housing burden, and risk of eviction among low income and protected classes, deteriorated properties.	County Executive; County Council; ACDS; Inspections and Licensing Department; Health Department	During FY 2026, work with Department of Health and Inspections and Permits to research and explore the feasibility of implementing local code changes and policies to license all rental dwellings are licensed. Develop an implementation plan as appropriate. During FY 2026, work with relevant County agencies to improve transparency on the rental licensing status of rental units.
12	Educate Landlords about HUD's new guidance, and the guidance from Maryland DHCD, regarding tenant selection policies and urge application of that guidance across the private rental market. Evaluate and determine compliance with new guidance.	Private discrimination, source of income discrimination	ACDS, Housing Commission, MD DHCD	Engage fair housing and renter rights partners to deliver at least one training in FY 2026 to private property management firms. Explore need for further education around this issue.

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
13	Ensure that renters have advance notice of eviction dates and research and support opportunity to reclaim their personal property after eviction.	Barriers to affording rental housing which disproportionately impacts low income and protected classes. Loss of household wealth with destruction of personal property.	ACDS, Sheriff's Department, County Executive, County Council	Work with County Office of Law and the Sheriff's Office to identify strategies to provide renters with more advanced notice of when an eviction will take place. Strategies may include developing a County ordinance which requires reasonable advance notice to the tenant of an eviction date. Research feasibility of and options for storing tenant personal property for a reasonable period of time after eviction.
14	Continue - at some level - the eviction prevention and shelter diversion programs that were initiated during COVID-19 pandemic, which allowed low income renters to avoid eviction and/or be diverted from shelters.	Barriers to accessing and maintain rental housing which disproportionately impacts low income and protected classes.	County Executive, County Council, ACDS	Invest County funds into Eviction Prevention and Shelter Diversion Program, while continuing to coordinate to account for the major drop in federal fund. Assistance may include payments for rental arrears, security deposits, 1st months rent, payments for application fees, security deposits, and referrals to other services.
<b>Enhance fair housing resources, compliance, and education efforts</b>				
15	Improve fair housing compliance by continuing to employ a targeted testing program that is complemented by enforcement by local, state and/or federal entities.	Private discrimination, need for local public fair housing enforcement	Office of Equity and Human Relations, ACDS	The County will continue to contract with Equal Rights Center, or another qualified provider, to conduct targeted testing on an as needed basis; violations of fair housing law will be referred to the appropriate enforcement agency.
16	Ensure the continuous availability of fair housing training videos and other materials for housing providers, housing counselors, renters, homeowners and homebuyers.	Discrimination and access to housing. Disparate housing challenges for protected classes.	ACDS, MD DHCD, fair housing organizations	By the end of FY2026, develop a webinar series offered live for participation by housing providers, housing counselors, renters, homeowners and homebuyers covering fair housing law in general and, in separate sessions over time, covering specific topics of particular interest; record and make the sessions available for future viewing.
17	Provide annual fair housing training to housing providers, County's Continuum of Care, and other organizations that have received County funding to provide housing services.	Barriers to affording rental housing which disproportionately impacts low income and protected classes.	ACDS, CoC	Complete annual fair housing training for housing providers receiving County funding for housing services.



ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
18	Coordinate training for local government leaders on AFFH obligations under the Fair Housing Act after each State-level election.	Lack of information and analysis of impact of fair housing violations.	ACDS, Office of Law, Office of Equity and Human Rights	Need for regional cooperation and stakeholder involvement in carrying out commitments to affirmatively furthering fair housing choice. Lack of attention/analysis regarding potential impacts of policy and resource decisions on protected classes. Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice. Complete trainings for local legislators about AFFH obligations of local governments after each State-level election every four years.
19	Work with a coalition of local jurisdictions and private organizations during the next Maryland legislative session and subsequent sessions, if necessary, to support passage of a bill that would allow audio recording of fair housing tests during fair housing testing of housing providers.	Prevent private discrimination, need for fair housing enforcement	ACDS, OEHR, County Human Relations Commission, MCCR	Maryland's wiretapping law prohibiting audio recording of fair housing tests without the housing provider's consent reduces the effectiveness of fair housing testing as a tool to prevent and enforce fair housing laws. Review and support legislative bills which address disparities in treatment of renters.
20	Office of Equity and Human Rights will continue and enhance its fair housing enforcement and outreach/educational activities to ensure compliance at the local level.	Discrimination and access to housing, Disparate housing challenges for protected classes.	Office of Equity and Human Relations	OEHR will develop and implement fair housing strategies around testing and enforcement on an annual basis.

## City of Baltimore Fair Housing Action Plan

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Support local fair housing capacity</b>			
1	<b>Create a partnership between the DHCD, HABC, and the Office of Equity and Civil Rights - the City's fair housing compliance agency.</b>	Capacity building to further compliance with fair housing laws	DHCD, HABC, OECR	OECR will initiate the first convening by the end of Q2 of Calendar Year 2025, establish a regular meeting cadence, and identify key metrics to track
2	<b>Ensure that HOME funded developers create and implement meaningful affirmative marketing plans</b>	Providing timely and culturally relevant knowledge of availability of affordable housing using comprehensive communications methods	DHCD	HOME agreements will contain affirmative marketing plans and their implementation will be enforced as part of the contract compliance process for all HOME projects.
3	<b>Continue to support Limited English Proficiency fair housing education</b>	Lack of educational materials and training available in other languages.	OECR, DHCD, HABC	OECR, DHCD, & HABC will make available fair housing materials in the City's core languages: Spanish, French, Mandarin, Korean and Arabic. OECR, DHCD, & HABC will endeavor to conduct educational events in Spanish and other core languages.
4	<b>Pass and implement single stair reform in Baltimore City Housing code.</b>	Simplify housing code to make building new homeownership and rental properties less expensive, increasing housing supply and reducing housing costs for both developers and occupants.	DHCD, Mayor's Office	DHCD & Mayor's Office will work with bill sponsor to pass single stair bill reform, expeditiously and responsibly, and implement legislation.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Increase and preserve quality rental housing options				
5	Preservation of existing publicly subsidized affordable rental housing in any area in which improvements will significantly extend the amount of time housing units will remain a viable part of the city's publicly subsidized affordable housing inventory.	Preventing displacement of residents due to economic pressures; loss of affordable housing.	DHCD & HABC	Completion of the revitalization plan and the planned RAD conversion for O'Donnell Heights
6	Production of new publicly subsidized affordable rental housing across a range of geographies, including opportunity area census tracts and non-opportunity areas where the development activity will have a significant revitalizing impact on the area.	Providing affordable units in opportunity areas and in areas where redevelopment is occurring	DHCD & HABC	<p>In the Perkins, Somerset, Oldtown (PSO) redevelopment, HABC and its redevelopment partners intend to create 1353 new, phased mixed-income housing units spread across the PSO footprint.</p> <p>Poe Homes received a \$1.3 million HUD Choice Neighborhood Planning &amp; Action Activities Grant in September 2018. HUD approved the demolition application for Poe Homes in July 2023. HABC intends to complete the relocation of the current residents and the demolition of the existing structures, while spearheading the planning process for the redevelopment. For the surrounding communities of Poppleton and Hollins Market (neighborhoods near Poe), HABC and its partners have created a plan to create a park, assist non-subsidized existing homeowners with facade improvements, attract a grocery store and assist with the purchase of grocery equipment.</p>

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
7	Continue using HOME Investment Partnerships Program, Low Income Housing Tax Credits and other City of Baltimore and Housing Authority of Baltimore City resources in the production wheelchair accessible affordable housing for persons with disabilities in-excess-of the minimum amount required by federal regulation to replace UFAS units lost from the affordable housing inventory.	Providing affordable accessible housing	DHCD in partnership with HABC	DHCD will supplant the 5% accessible units required by Section 504 of the Rehabilitation Act with a 7% rate.
8	Support the implementation of the recently passed Inclusionary Housing Ordinance	Provide access to affordable housing in areas of opportunity	DHCD	DHCD will adopt and implement rules and regulations to adequately implement the Inclusionary Housing Ordinance.
9	Implement a Healthy Opportunities Program ("HOP"), which will be a mobility program that will assist families with children who are currently participants in HABC and where one or more family member has a medical condition, such as asthma, that is exacerbated by environmental factors. Housing and health-care providers will collaborate to provide stable, affordable and healthy housing in opportunity areas with the goal of improving participants' health outcomes and overall quality of life.	Disparities in access to housing in areas of opportunity & health disparities	HABC, BCHD	Assist up to 150 current participants in the HCVP receive mobility counseling and assistance with moving to opportunity areas.
10	If HUD issues a NOFA for Mainstream vouchers, HABC will consider applying for the vouchers depending on whether HABC is eligible and the NOFA requirements.	Integrated housing for persons with disabilities	HABC	The award and issuance of Mainstream vouchers in accordance with NOFA requirements.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Continue to address homeownership disparities for under-represented households</b>			
11	<b>Continue to foster homeownership opportunities for under-represented households.</b>	Addressing disparities in homeownership	DHCD & HABC	DHCD will provide down payment and settlement payment assistance to at least 800 low income households over the CFY 2026 through CFY 2030. HABC will assist at least 50 participants in the public housing and HCV program in becoming homeowners.
12	<b>Continue to support homeownership counseling, both purchase and default, for under-represented households.</b>	Addressing disparities in homeownership	DHCD	Fund homeownership counseling - pre-purchase, home-buying and foreclosure prevention and mitigation - for 3,000 households with incomes less than 80% of AMI per year for five years beginning with CFY 2026.
	<b>Facilitate access to fair housing enforcement</b>			
13	<b>Provide optimally effective fair housing information at HCV participant briefings.</b>	Private discrimination, source of income discrimination	OECR	Convene a FY 2026 conversation between PHAs and OECR to see if fair housing information could be presented to new HCV participants at their voucher briefings. If so, implement changes by FY27.
14	<b>Create a Know Your Rights Curriculum for presentation to the public as part of an educational series offered in Baltimore City Public Libraries.</b>	Lack of knowledge of fair housing laws and resources	OECR	OECR will partner with the Baltimore Pratt Library system to present Know Your Rights seminars on Fair Housing and other anti-discrimination rights available under Article 4 of the Baltimore City Code.

## **Baltimore County Fair Housing Action Plan**

### **Impediment #1: Lack of Knowledge About Fair Housing**

Information about fair housing rights is not universally known to organizations working with people of protected classes. Also, persons of protected classes may not know about or do not understand discrimination and how to address the situation if discrimination occurs.

- Residents of protected classes who experience housing discrimination may not understand that discrimination has occurred or may not know how to report discrimination and therefore could miss out on housing opportunities.
- Housing professionals, organizations, businesses, or policymakers that are unfamiliar with fair housing could unintentionally implement policies or procedures that are discriminatory toward a protected class.

#### **ACTIONS TO ADDRESS IMPEDIMENT #1**

- a. Conduct fair housing education and training to developers and housing providers to ensure compliance with fair housing laws.
- b. In conjunction with Economic Action Maryland and/or other qualified organizations, conduct workshops on tenant's rights and how to seek protections. This will be funded through the HUD federal funds and County funds for three years and all workshops will include translation.
- c. In partnership with County agencies, DHCD will coordinate, investigate, analyze and report all housing complaints (inspections, rent payments, and substandard housing).
- d. Further educate voucher participating families on fair housing laws within the Baltimore County Office of Housing's Administrative Plan.
- e. The County in partnership with the Equal Rights Center and/or other qualified organizations will conduct fair housing discrimination testing of the rental, lending, and sales market throughout the span of this AI Plan.

### **Impediment #2: Insufficient Housing Affordability and Safe Housing Options**

The County lacks sufficient quality affordable housing units to meet the demand in Baltimore County. 57.8% of housing units are pre-1980 construction. Older units tend to have higher maintenance and recurring costs, higher upfront renovation costs, and safety risks associated with older structures. Due to these increased costs, residents may be less likely to want to occupy older units and may not view these units as viable "affordable and available" options in their search for housing

In addition, County residents face significant cost burden. In 2023, 55% - more than 56,000 of renter-occupied households were cost-burdened as well as 24% of owner-occupied households.



## **ACTIONS TO ADDRESS IMPEDIMENT #2**

### **Insufficient Housing Affordability and Safe Housing Options**

- a. Launch a Tenant Based Rental Assistance Program to provide additional assistance to renters.
- b. In partnership with Economic Action Maryland, and/or other qualified organizations, the County will offer webinars for landlords on resources to assist with property improvement and housing stability.
- c. In partnership with HUD certified counselors, the County will also continue offering free or very low-cost foreclosure prevention and housing counseling services.
- d. Utilize available housing data to develop a long-term housing strategy for the County to address major needs and concerns, including the high volume of cost-burdened households, increasing overcrowding, and an aging housing stock.
- e. Implement and monitor Executive Order 2024-011 to ensure that all residential projects assisted by County funds include units priced for low-to-moderate income households.
- f. Build on existing efforts to track Voluntary Compliance Agreement Hard Units, utilizing the Rental Occupancy Demographic Report (RODR) and coordinating with BMC's affordable housing database to develop a longer-term process to track data showing all attainable housing units created by household type (senior, family, large family, accessible).
- g. Continue to expand incentives for property owners and investors to preserve units for families at middle-income and lower-income levels. This would ideally include incentives targeted to those seeking to build new units as well as those seeking to substantially rehabilitate existing buildings.
- h. Continue to fund and market the Single-Family Rehabilitation program to maintain affordable housing in the County.
- i. Continue to fund and market the down payment assistance homebuyer program to encourage new homeownership for low-to-moderate income households.
- j. Develop a housing choice voucher (HCV) program outreach strategy that recruits and educates partners and landlords about the responsibilities of the HCV program, while also providing needed information to tenants about the various neighborhoods and their amenities and resources.
- k. Draft a Language Access Plan to ensure program materials are provided to individuals who are non-English speaking or have limited English proficiency, as required by HUD. While the LAP will benefit applicants to housing programs, it will be used for all HUD-funded programs administered by the County.

### **Impediment #3: Lack of Accessible Housing for Persons with Disabilities**

Accessible housing options are not often available to people with disabilities.

## **ACTIONS TO ADDRESS IMPEDIMENT #3**

### **Lack of Accessible Housing for Persons with Disabilities**

- a. Work with the Commission on Disabilities and other qualified organizations to gather and analyze data to better understand and describe the needs for and the supply of accessible housing in Baltimore County.
- b. Expand efforts to use public funds and leverage private investment to expand the supply of accessible, affordable housing.
- c. Inventory accessible housing units in the County that are available for rent and coordinate with partner departments to create a comprehensive list for the County. This inventory should include the unit size, accessibility features, and market rate vs. subsidized designation. DHCD will develop a schedule for regularly updating the inventory.
- d. Provide support services for vulnerable populations, including those with disabilities and seniors.
- e. Continue administering and further publicize programs focused on accessibility-related home modifications. These programs include the Housing Accessibility Modification Program (HAMP), which provides financial assistance towards physical modifications (chair lifts, grab bars, railings, etc.) to households at or below 80% of the Area Median Income (AMI), and the Conciliation Housing Accessibility Modification Program (CHAMP), which provides similar assistance to participants of the Housing Choice Voucher (HCV) Program or other federally-funded housing voucher programs.

### **Impediment #4: Lack of Financial Education**

Some residents do not understand or are not exposed to financial education opportunities. The lack of financial understanding coupled with discriminatory practices in the housing industry can prevent some residents from choosing where they live and from accumulating wealth through homeownership.

## **ACTIONS TO ADDRESS IMPEDIMENT #4**

### **Lack of Financial Education**

- a. In partnership with HUD certified counselors and other qualified non-profit organizations, the County will provide free or very low cost supports for financial literacy and housing counseling services.
- b. Through the HCV Family Self-Sufficiency program, develop workshops surrounding housing counseling services and financial literacy to utilize housing choice vouchers towards homeownership.

## Harford County Fair Housing Action Plan

ROW #	HARFORD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>Enhance regional fair housing capacity</b>				
1	Continue to support housing policy coordination staffing at BMC to coordinate the implementation of this action plan AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).	Resources for regional coordination of commitments to affirmatively furthering fair housing choice	Local jurisdictions, BMC	Jurisdictions continue their contributions to BMC regional coordination, including increases for inflation. In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.
2	BMC continue to convene local and State housing agencies with housing practitioners and advocates through BMC's Housing Committee to review progress on implementing these regional action steps and strategize on further action.	Need for regional cooperation and stakeholder involvement in carrying out commitments to affirmatively furthering fair housing choice	BMC, Chair of Fair Housing Group	BMC and Fair Housing Group Chair to convene BMC Housing Committee quarterly or as needed on an ongoing basis.
<b>Address barriers to equalizing access to opportunity</b>				
3	Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units.	Limited future development and more limited housing choice as the County approaches build out	Harford County Department of Housing and Community Services	Provide HOME and CDBG funds to support investment in older communities and to provide rehabilitation to older homes. Partner with eligible CHDOs to redevelop and preserve 20 affordable housing units throughout the County annually. Partner with eligible CBDOs to invest in neighborhood projects that improve opportunity in older communities.
4	Continue to fund affordable housing for families, primarily in opportunity areas.	Concentration of affordable and accessible housing in low opportunity areas	Harford County Department of Housing and Community Services	Work with nonprofit and for-profit developers of affordable housing to create affordable housing units in opportunity areas. Increase the number of HCVs available for these units.

ROW #	HARFORD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
<b>Increase ownership opportunities for under-represented households</b>				
5	Continue to foster opportunities for homeownership throughout the County including housing counseling and down payment assistance for first time homebuyers.	Disparities in homeownership	Harford County Department of Housing and Community Services	Continue housing counseling and partnership with lending programs/partners to provide downpayment assistance to increase homeownership opportunities for first-time homebuyers.
<b>Increase and preserve quality rental housing options</b>				
6	Support the Regional Project-Based Voucher Program (PBV) managed by the Baltimore Metropolitan Council (BMC). Continue free housing counseling for program participants who choose to live in Harford County PBV housing.	Far from rest of Baltimore Metropolitan Area; Limited transportation and walkable amenities in opportunity areas	Harford County Department of Housing and Community Services	Establish relationship between housing counselors, PBV property managers, and BMC program managers to make easy referral system.
7	Enforce the Harford County Livability Code to improve the quality of existing affordable rental housing.	Concentration of low-quality affordable units in low opportunity areas; Few resources for landlords to address required repairs	Harford County Department of Inspections, Licenses and Permits	Review annual DILP livability numbers to determine where in Harford County better quality affordable housing needs to be developed.
8	Promote Family Self-Sufficiency (FSS) program and connect clients with transportation and employment opportunities.	Disparities in access to opportunities	Harford County Department of Housing and Community Services	Continue to market the FSS program to underserved communities.

ROW #	HARFORD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Expand fair housing resources and compliance			
9	Coordinate with the Maryland Office of Tenant and Landlord Affairs to provide under-represented households access to their rights and protections as tenants through the Renters' Rights and Stabilization Act.	Little knowledge of renters' rights in community; Early stages of landlord accountability makes compliance harder to track	Harford County Department of Housing and Community Services	Connect residents with Tenant and Landlord Affairs through housing counseling staff.
10	Streamline communication between offices of Housing and Community Services to better connect residents with fair housing complaints to the appropriate resources.	Navigation between offices requires multiple phone calls and referral systems; Developing central system for fielding complaints within single department (formerly two departments)	Harford County Department of Housing and Community Services	Establish a process for fair housing complaints within the Department to move inquiries quickly and efficiently to the correct resource.

## Howard County Fair Housing Action Plan

ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	<b>Increase rental housing options</b>			
1	<b>Consider policies adopted in Howard County's General Plan, HoCo by Design, that can be implemented to increase rental housing unit creation and/or preservation throughout the County.</b>	Future development and housing choices are constrained as land available for development in the County is limited.	Howard County DHCD, Howard County DPZ	The Housing Opportunities Master Plan was completed in 2021. The County continues to implement the recommendations in the plan pertaining to the creation and preservation of affordable rental units for low- and moderate-income residents in the County.
2	<b>Open up new land use opportunities through zoning changes (e.g. commercial and industrial zones could allow affordable units) and/or donated land.</b>	Limited future development and housing choice as the County approaches build out, especially when growth can be limited due to APFO and is more likely to be redevelopment or infill, instead of new development.	Howard County DHCD, Howard County DPZ	Partner with the Department of Planning and Zoning to consider zoning changes that could open up land use for multi-family and affordable housing as stated in the County's general plan update, HoCo by Design. Address geographic inequities identified in the Housing Opportunities Master Plan.
3	<b>Continue or increase funding for creating units and/or subsidizing tenant rents in opportunity areas. (e.g. dedicated funding source for affordable housing).</b>	Disparities in Access to Opportunity; Increasing concentration of protected classes as County approaches build out and affordable housing units are harder to find or access.	Howard County Housing Commission, Howard County DHCD	Continue to work with BMC and BRHP to contribute funding for the Regional PBV program. Apply for federal voucher opportunities. Apply for state and federal funds to leverage with County funds.
4	<b>Continue to monitor FMR payment standards and rents. Continue to provide mobility counseling to encourage voucher location in Opportunity Areas.</b>	Disparities in Access to Opportunity; Increasing concentration of protected classes as County approaches build out and units become more difficult to find or access.	Howard County Housing Commission	Continue to monitor payment standards and rents to ensure that voucher holders have as much geographic choice as possible.



ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
5	Consider opportunities for acquisition of properties in geographically diverse areas to assist with the creation and preservation of affordable housing options outside of older Columbia areas.	Acquisition should focus on areas with fewer affordable housing options to avoid a concentration of affordable units, similar to some communities in older areas of Columbia.	Howard County Housing Commission	Acquisitions of new properties by the Commission should generally be in areas in which the FARM (Free and reduced meal) rates in the community schools are at or below the County-wide average.
6	Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that: a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population. b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas.	Disparities in Access to Opportunity; location and type of affordable housing; siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plan and other programs	Howard County Housing Commission	Continue to work with BMC to provide comments to the State regarding the annual LIHTC application.
Expand fair housing resources and compliance				
7	Support fair housing enforcement, testing, education and outreach in the County. Coordinate regionally to support the fair housing program at Economic Action Maryland (EAM) and locally to support the Howard County Office of Human Rights and Equity.	Overt discrimination may continue to be a problem. Testing is necessary to ensure compliance with Fair Housing requirements.	Howard County DHCD, Howard County Office of Human Rights and Equity, Howard County Office of Consumer Protection	Provide annual funding for fair housing testing, enforcement, education and outreach training. Provide annual fair housing training for landlords, property owners, property managers and tenants. Support EAM in their paired testing efforts.

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	<b>Address barriers to equalizing access to opportunity</b>			
8	<b>Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units, especially in areas along transportation routes.</b>	Limited future development and more limited housing choice as the County approaches build out, especially if growth is reduced due to APFO requirements.	Howard County DHCD	Utilize Community Renewal funds to support investment in older communities by continuing to provide funding for downpayment assistance and rehabilitation loan programs.
9	<b>Continue to support efforts to nurture and sustain racially integrated communities in Howard County, such as the Columbia Housing Center.</b>	Address the increasing concentration of protected classes as County approaches build out and units become more scarce	Howard County DHCD, Howard County Housing Commission, Howard County Office of Human Rights and Equity and Howard County Office of Consumer Protection	Continue to provide annual CDBG funding for this effort to ensure there is inclusiveness, equity, openness and accountability. Address geographic inequities identified in the Housing Opportunities Master Plan.
	<b>Increase ownership opportunities for under-represented households</b>			
10	<b>Engage lenders in discussions about homeownership and mortgage lending disparities and how to address them. Work with the national and local association of realtors to develop specific action steps to increase the homeownership rate in the County, particularly for minorities and underrepresented residents.</b>	Disparities in homeownership rates; access to financial services	Howard County DHCD, Howard County Office of Human Rights and Equity	Continue conversations with the Howard County Association of Realtors and mortgage lenders to invest in programs that could change the homeownership rate in the County. Continue support of homeownership initiatives, such as the County's Moderate Income Housing Unit program, Settlement Downpayment Loan Program and Rehabilitation Loan Program, to create wealth building opportunities for County residents, particularly those of low- and moderate-income. Continue to invest in first time homebuyer counseling and homeownership education.

ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
11	<b>Seek opportunities to develop mixed-income homeownership projects.</b>	As prices continue to rise, there are fewer starter home and moderate-income homeownership properties available.	Howard County DHCD, Howard County Housing Commission, Howard County DPZ	Work with land owners and developers to encourage homeownership developments with higher proportions of smaller, more affordable homes. Work with Howard County DPZ to facilitate the development of smaller, more affordable units. Consider opportunities for faith-based housing developments to include affordable and/or mixed income units.
<b>Expand fair housing choice for persons with disabilities</b>				
12	<b>Facilitate affordable senior housing and housing for persons with disabilities by offering financial incentives for more affordable units and/or exceptions to the AFPO requirements.</b>	Access to publicly supported housing for people with disabilities; need for affordable, integrated housing for individuals who need supportive services.	Howard County DHCD, Howard County Housing Commission, Howard County DPZ	Educate developers and builders about the DIHU (Disability Income Housing Unit) method of optional compliance for the MIHU requirement in a development. Consider incentives for new housing developments to provide accessibility features in at least 5% of the units.