



2019 Analysis of Impediments to Fair Housing Choice

March 23, 2019

Bristol Township
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Executive Summary

The following Analysis of Impediments to Fair Housing Choice (AI) serves as a comprehensive look at fair housing issues in Bristol Township. The report includes an analysis of various demographic, economic, and housing indicators, a review of public and private sector policies that affect fair housing, and a review of the township's efforts to affirmatively further fair housing (AFFH) per federal law. This report is set up in three main sections: 1) Community Profile; 2) Public Sector Analysis; and 3) Fair Housing. A final section identifies the impediments to fair housing choice in the township and recommends actions that can be taken to address each of these impediments.

Located in Bucks County, Pennsylvania, Bristol Township is the major transportation hub in the area, while also being a travel destination for many visitors each year. The township comprises a total area of just over 17 square miles and had a population of 54,170 in 2016. This is a slight decrease of -2.4% since 2000 when the population was 55,521. Among various factors that affect population change and growth in any jurisdiction, one is the availability of affordable housing.

With the rising pressure to create affordable housing, the township faces barriers and impediments such as lack of sufficient new housing development and a continued need for fair housing awareness and education in order to effectively realize fair housing for all residents seeking homes. Bristol Township has taken steps to promote fair housing and to educate its leadership, staff, and residents to ensure that all residents in the township are protected under state and local law and to adhere with the Department of Housing and Urban Development (HUD) regulations on fair housing as required by HUD entitlement grants. These promotion efforts include defining fair housing and discrimination in housing, identifying what steps it must take to overcome the barriers identified, and what the consequences are for non-adherence to a fair housing and non-discrimination policy.

This report provides an analysis of the most recent data available from the Home Mortgage Disclosure Act (HMDA) database. HMDA data provides insight into the mortgage lending practices and trends throughout Bristol Township. In 2017, there were approximately 2,500 applications for single-family home purchase, refinance, or home improvements that were submitted with over 1,100 of those applications resulting in a loan origination – a 44 percent approval rate. Approximately 400 mortgage applications were neither denied nor originated, or a 16 percent overall denial rate. The top two application denial reasons within the Township were credit history (33 percent) and debt-to-income ratio (26 percent), representing nearly 60 percent of the Township's total denials. Whites were least likely to be denied for conventional single-family home purchases, being denied at a rate of 7 percent, while Black applicants faced the highest conventional home purchase denial rate at 19 percent.

The conclusion of this analysis has identified several current impediments to fair housing choice. For each impediment, recommendations and outcome measures have been identified for activities that can help to alleviate these impediments moving forward. The current impediments to fair housing choice are:

- Lack of fair housing awareness and education in the Township
- Need for fair housing information translated for limited English-speaking
- Access to public transportation is insufficient in Bristol Township
- Lack of new housing development in the Township
- Shortage of affordable units in a range of sizes
- Displacement of residents due to economic pressures

Methodology

The Analysis of Impediments to Fair Housing Choice consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within Bristol Township. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the township, with a particular focus on those that affect housing and special needs populations;
- Public and private organizations that impact housing issues in the township and their practices, policies, regulations, and insights relative to fair housing choice;
- The range of impediments to fair housing choice that exists within both the urban center communities and other areas of the township;
- Specific recommendations and activities for the township to address any real or perceived impediments that exist; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing needs and related issues. These documents included local comprehensive plans and ordinances, the Housing and Community Development Consolidated Plan for Bristol Township, the 2014 Analysis of Impediments to Fair Housing Choice and other policy documents. Stakeholder input and observations were incorporated as well.

Additional quantitative data were obtained from sources including U.S. Census Bureau reports, American Community Survey data (ACS), the US Bureau of Labor Statistics (BLS), Longitudinal

Employer-Household Dynamics (LEHD), Boxwood Means Inc. via PolicyMap, Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Disclosure Act data (HMDA), and the US Department of Housing and Urban Development (HUD).

Purpose of Fair Housing

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem, but it was far from a solution. Since the passing of the Act, community groups, private businesses, concerned citizens, and government agencies at all levels have worked diligently to battle housing discrimination. The Fair Housing Act mandates that HUD ‘affirmatively further fair housing’ through its programs. Towards this end, HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.

As part of the HUD-mandated Consolidated Planning process, Bristol Township adopted its Five-Year Consolidated Plan in 2015. The Five-Year Consolidated Plan is an assessment of the economic and social state of the township, as well as local government policies and programs aimed at improving the living environment of its low- and moderate-income residents. The Strategic Plan includes a vision for the region that encompasses the national objectives of the Community Development Block Grant (CDBG) program and is accompanied by a first year Action Plan that outlines short-term activities to address identified community needs. As part of the planning process, Bristol Township must also affirmatively further Fair Housing and undertake Fair Housing planning. This process includes the preparation of an Analysis of Impediments to Fair Housing Choice.

This 2019 Analysis of Impediments to Fair Housing Choice is an in-depth examination of potential barriers, challenges, and opportunities for housing choice for Bristol Township residents on a townshipwide scale. Impediments to Fair Housing are defined as any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice. Fair Housing Choice is the ability of persons of similar income levels – regardless of race, color, religion, national origin, disability, gender, or familial status, to have the same housing choices.

The Analysis of Impediments is an integral component of the fair housing planning process and consists of a review of both public and private barriers to housing choice. It involves a

comprehensive inventory and assessment of the conditions, practices, laws, and policies that impact housing choice within a jurisdiction. It provides documentation of existing, perceived, and potential fair housing concerns and specific action strategies designed to mitigate or eliminate obstacles to housing choice for the residents. The Analysis is intended to serve as a strategic planning and policy development resource for local decision-makers, staff, service providers, the private sector, and community leaders in the township. As such, this Analysis of Impediments will ultimately serve as the foundation for fair housing planning in the region.

The long-term objective of this Analysis of Impediments to Fair Housing Choice is to make housing choice a reality for residents of Bristol Township through the prevention of discriminatory housing practices. One goal of the study is to analyze the fair housing situation in the township and assess the degree to which fair housing choice is available for area residents. A second goal is to suggest ways to improve the level of choice through continued elimination of discriminatory practices, if any are found to exist. The sections that follow provide a brief overview of the legal and conceptual aspects of fair housing planning and policy.

Fair Housing Concepts

Housing choice plays a critical role in influencing individuals' and families' abilities to realize and attain personal, educational, employment, and income potential. The fundamental goal of HUD fair housing policy is to make housing choice a reality through sound planning. Through its ongoing focus on Fair Housing Planning, HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing." Among the recurring key concepts inherent in fair housing planning are:

- *Affirmatively Further Fair Housing (AFFH)* – Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.
- *Affordable Housing* – Decent, safe, quality housing that costs no more than 30% of a household's gross monthly income for utility and rent or mortgage payments.
- *Fair Housing Choice* – The ability of persons, regardless of race, color, religion, national origin, disability, gender, or familial status, of similar income levels to have the same housing choices.
- *Fair Housing Planning (FHP)* – Fair Housing Planning consists of three components: the *Analysis of Impediments*, a detailed *Action Plan* to address identified impediments, and a

monitoring process to assess progress in meeting community objectives. FHP consists of a close examination of factors that can potentially restrict or inhibit housing choice and serves as a catalyst for actions to mitigate identified problem areas.

- *Impediments to Fair Housing* – Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.
- *Low and Moderate Income* – Defined as 80% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. *Very low-income* is defined as 50% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. Poverty level income is defined as 30% or below median household income.
- *Private Sector* – Private sector involvement in the housing market includes banking and lending institutions, insurance providers, real estate and property management agencies, property owners, and developers.
- *Public Sector* – The public sector for the purpose of this analysis includes local and state governments, regional agencies, public housing authorities, public transportation, community development organizations, workforce training providers, and community and social services.

Community Profile

The goal of the community profile is to paint a picture of the current demographic, economic, and housing framework of Bristol Township in order to aid decision makers in affirmatively furthering fair housing. The Community Profile is broken into two key sections: the Demographic and Economic Profile and the Housing Profile. The Demographic and Economic profile looks at the township from the perspective of its people, exploring variables such as race and ethnicity, age, disability status, income, employment, and poverty. The Housing Profile looks at the area's housing stock from various angles such as home values, rents, housing cost burden, vacancy, and substandard housing to provide a snapshot of the physical environment of Bristol Township. Together, these pieces provide a data-driven view of the township that will empirically ground fair housing planning efforts.



Demographic and Economic Profile

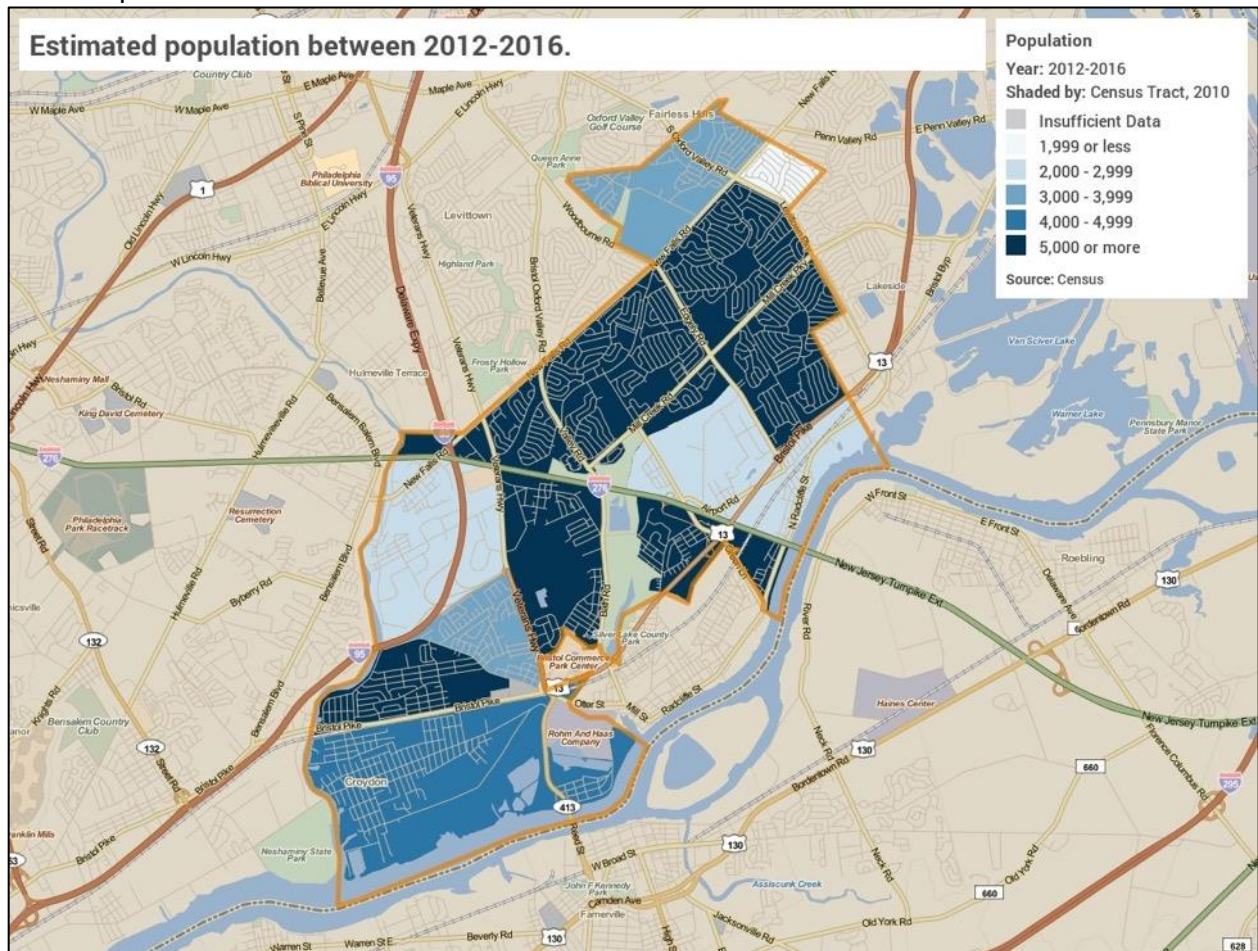
Population

The current population of Bristol Township is 54,170, according to 2012-2016 American Community Survey 5-Year Estimates. This represents a population decrease of 2.4% since 2000. The state growth rate for the same period was 4.1%. The data table below details population change in the township and the State of Pennsylvania between 2000 and 2016.

<i>TABLE: Population - 2000 to 2016</i>			
City/State	2000	2016	% Change 2000-2016
Bristol Township	55,521	54,170	-2.4%
Pennsylvania (state)	12,281,054	12,783,977	4.1%
Source: 2000 Census DP-1, 2012-2016 American Community Survey 5-Year Estimates (DP05)			

The following map geographically displays the distribution of the population throughout the township. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

MAP: Population



Source: 2012-2016 ACS via PolicyMap

According to the map above, there are several census tracts throughout the Township that have 5,000 or more people. One census tract in the northeast part of the township has less than 2,000 people.

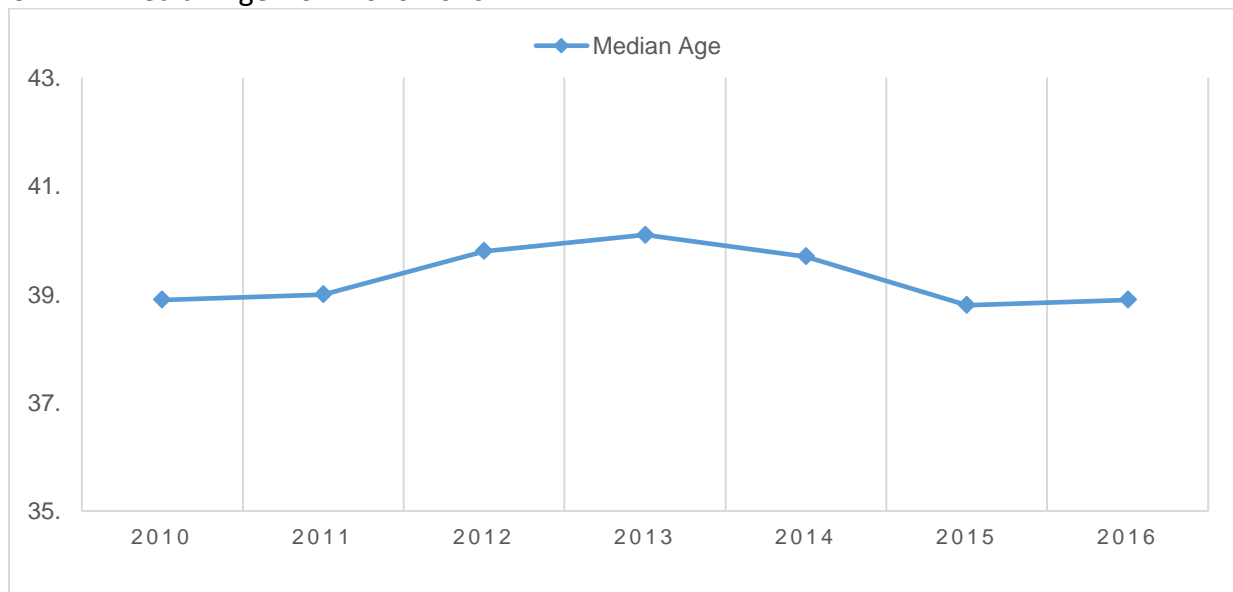
Age

Like much of the country, demographic data from the township indicates that the age of the population may be growing. In 2016, elderly 65 years and older were 13.2% of the total population in Bristol Township. That represents an increase of 0.5% from 2000, when people aged 65 and older also made up 12.7% of the total population. In addition to the percentage growth in elderly residents, the population of elderly in the township grew from 7,046 in 2000 to 7,146 in 2016. In 2016, the largest age cohort in the township was 45 to 54 years with 15.4% of the total population (9,331 persons).

TABLE: Age Distribution		
Age Cohort	Number of People in Age Group	Percent of People in Age Group
	Bristol Township	
Under 5 years	3,277	6.0%
5 to 9 years	3,598	6.6%
10 to 14 years	2,913	5.4%
15 to 19 years	3,119	5.8%
20 to 24 years	3,925	7.2%
25 to 34 years	7,231	13.3%
35 to 44 years	6,700	12.4%
45 to 54 years	8,331	15.4%
55 to 59 years	4,257	7.9%
60 to 64 years	3,673	6.8%
65 to 74 years	4,122	7.6%
75 to 84 years	1,991	3.7%
85 years and over	1,033	1.9%
Median Age	38.9	N/A
Source: 2012-2016 American Community Survey 5-Year Estimates (DP05)		

The median age in Bristol Township has been rising. Bristol Township's median age is 38.9 years old, approximately 2 years younger than the statewide median. In 2016, the median age in Pennsylvania was 40.6 years according to American Community Survey 5-Year Estimates. This represents an increase in the statewide median age since the 2000 Census when the median age was 38 years of age. In comparison, over the same period the township-wide median age in Bristol Township increased from 35.9% to 38.9%.

CHART: Median Age from 2010-2016



Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates (S0101)

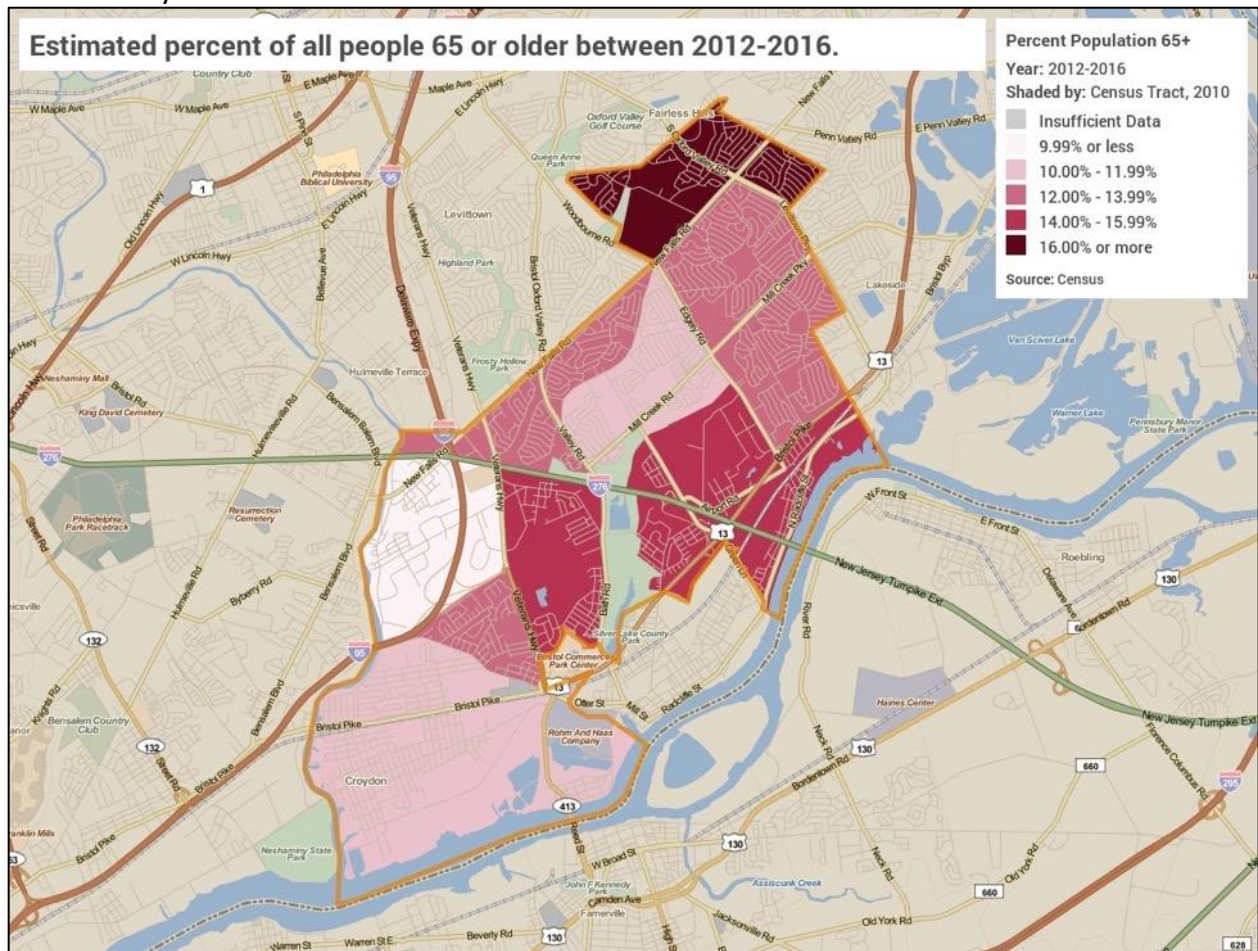
Elderly

Where housing is concerned, the needs of people aged 65 and over are particularly important. As people age, they may require new types of social services, healthcare, and housing. As communities across the nation grow proportionately older, the needs of the elderly become an increasingly important aspect of both public and private decision-making. Central to these evolving needs is access to housing options that are decent, safe, affordable, accessible, and located in proximity to services and transportation. Housing is one of the most essential needs of the elderly because the affordability, location, and accessibility of where they live will directly impact their ability to access health and social services – both in terms of financial cost and physical practicality. With the median age increasing more quickly in Bristol than the State as a whole, housing issues among the elderly will become increasingly salient to Bristol Township policy makers in the years to come.

People aged 65 and over comprise a lower percentage of Bristol Township's population than that of Pennsylvania as a whole. Approximately 13.2 percent of the township's population was over the age of 65 (7,149 persons) - compared to the state at 16.7 percent (2012-2016 ACS). Additionally, 1.9 percent of the township's population was aged 85 years and over (1,033 persons) – compared to just 2.5 percent in the state as a whole.

The following two maps highlight the geographic distribution of the elderly population throughout the township. The first map details the distribution of those aged 65 and older; the second map details the distribution of those aged 85 and older. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

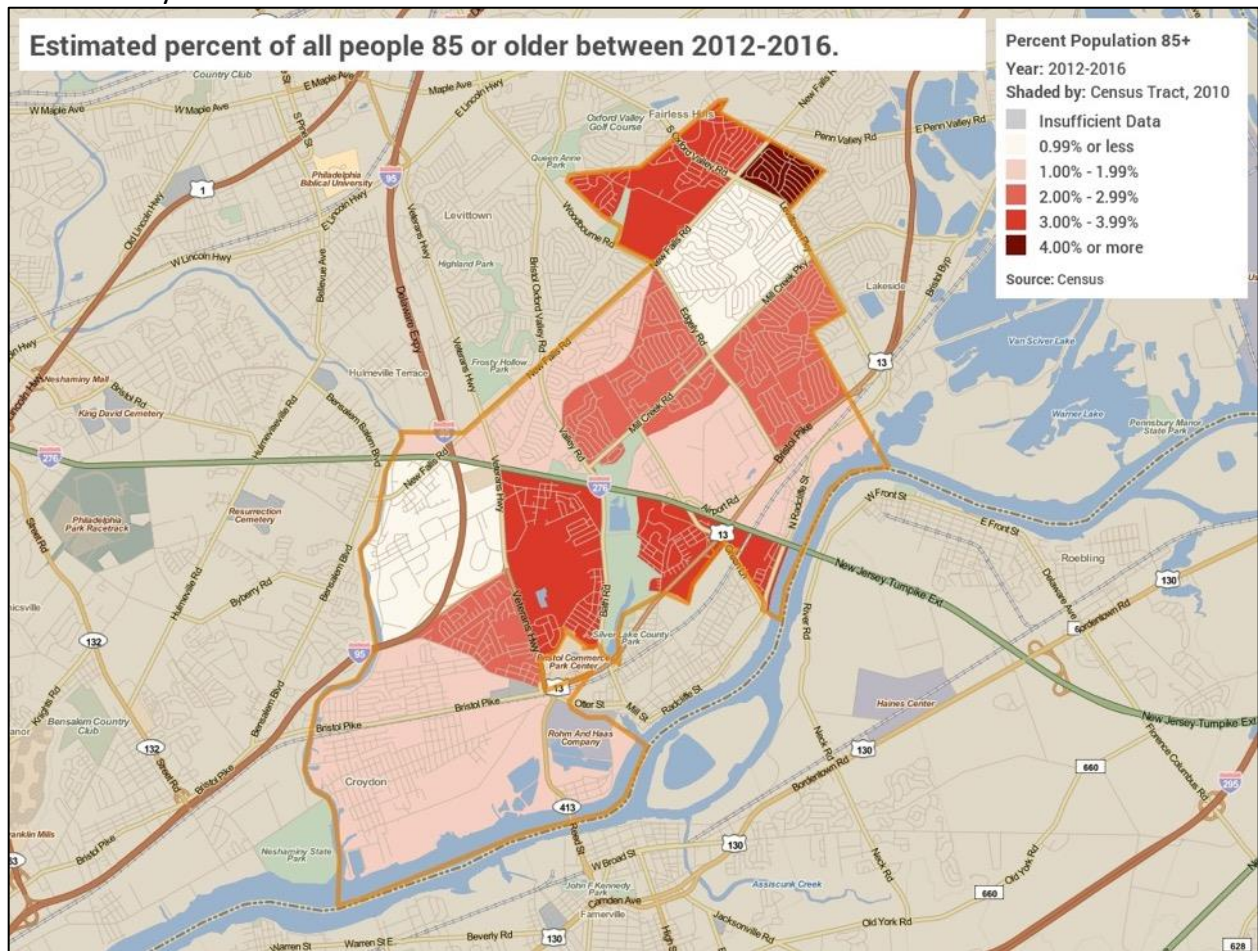
MAP: Elderly - 65 and Older



Source: 2012-2016 ACS via PolicyMap

There is a concentration of elderly residents in the township in the northeast corner where more than 16% of the population is elderly. On the western side there are fewer elderly residents, sometimes less than 10% of a census tract is elderly.

MAP: Elderly - 85 and Older



Source: 2012-2016 ACS via PolicyMap

Age Dependency Ratios

Age dependency ratios relate the number of working-aged persons to the number of dependent-aged persons (children and the elderly). An area's dependency ratio is comprised of two smaller ratios – the child dependency ratio and the old-age dependency ratio. These indicators provide insight into the social and economic impacts of shifts in the age structure of a population. Higher ratios of children and the elderly require higher levels of services to meet the specific needs of those populations. Furthermore, a higher degree of burden is placed on an economy when those who mainly consume goods and services become disproportionate to those who produce. It is important to note that these measures are not entirely precise – not everyone under the age of 18 or over 65 is economically dependent, and not all working age individuals are economically productive. With these caveats in mind, dependency ratios are still helpful indicators in gauging the directional impacts of shifting age structures.

TABLE: Age Dependency Ratio

City/State	Old-age Dependency Ratio	Child Dependency Ratio	Age Dependency Ratio
Bristol Township	20.2	32.7	52.8
Pennsylvania (state)	26.8	34.0	60.9
Source: 2012-2016 American Community Survey 5-Year Estimates (S0101)			

Given the shifting demographics discussed in the previous sections, the age dependency ratios across the township will continue to rise in Bristol Township. A 2010 US Census report on aging trends in the United States provides insight into the extent of the coming shift in the United States: "By 2030, all of the baby boomers will have moved into the ranks of the older population. This will result in a shift in the age structure, from 13 percent of the population aged 65 and older in 2010 to 19 percent in 2030." As this shift occurs, the working age population will simultaneously be shrinking. Sixty percent of the nation's population was aged 20-64 in 2010. The Census estimates that by "2030, as the baby boomers age, the proportion in these working ages will drop to 55 percent."¹

¹ US Census Bureau, *The Next Four Decades: The Older Population in the United States: 2010 to 2050*. Retrieved from: <https://www.census.gov/prod/2010pubs/p25-1138.pdf>

Being mindful of these changes in old-age dependency ratios is especially important for communities with a growing elderly population. In addition to the percentage of persons aged 65 and older growing slightly from 2000 to 2016, the population of elderly in the township grew from 7,046 in 2000 to 7,146 in 2016. This growth may seem small, but given that the Township's overall population shrank by 2.4% during this time this translates to fewer working age residents. A shrinking working age population means fewer workers producing goods and services, and consequently generating less tax revenue. An aging population also increases demand for social services, healthcare, and housing for the elderly. The intersection of these two trends presents a unique challenge for communities such as Bristol Township in the coming years.

Race and Ethnicity

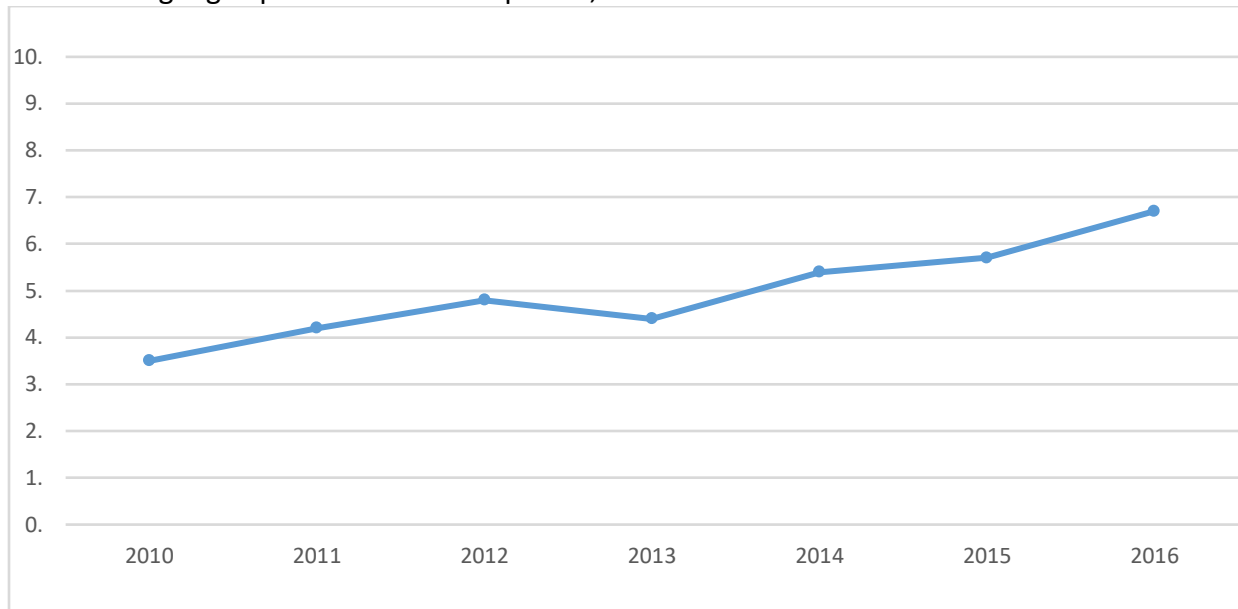
According to the 2012-2016 ACS 5-Year Estimates, White residents comprised 84.1% of the population, Black residents composed 9.6%, and all other racial groups the remaining 6.2%. Approximately 9.5% of the population identify as ethnically Hispanic (persons can identify as both ethnically Hispanic and racially as another group, usually White). The table below provides a detailed breakdown of the racial and ethnic composition of the township as compared to the state as a whole.

TABLE: Racial and Ethnic Composition				
Race	Bristol Township	Percentage	Pennsylvania (state)	Percentage
White	45,548	84.1%	10,402,743	81.4%
Black or African American	5,222	9.6%	1,410,563	11.0%
American Indian and Alaska Native	143	0.3%	24,947	0.2%
Asian	1,368	2.5%	401,979	3.1%
Native Hawaiian / Other Pacific Islander	1	0.0%	4,463	0.0%
Some other race	731	1.3%	253,514	2.0%
Two or more races	1,157	2.1%	285,768	2.2%
Hispanic or Latino (of any race)	5,150	9.5%	843,164	6.6%
Source: 2012-2016 American Community Survey 5-Year Estimates (DP05)				

While the percentages of all races have remained relatively constant since 2000, the composition of Bristol Township's ethnicity is changing. In 2000, 3.9% of the population in Bristol Township identified ethnically as Hispanic or Latino. By 2016, that figure more than doubled (9.5%).

With the number of individuals who identify as ethnically Hispanic rising in Bristol Township, the needs of the community will also shift accordingly, particularly in the areas of communication and language. While English is the primary language in Bristol Township, as is common across the country, there are many people who still speak another language at home. In the case of the Hispanic population, Spanish is the primary language spoken. According to the 2012-2016 ACS, nearly 20% of Spanish speaking households are limited English Speaking households. Below is a chart showing the change in the number of individuals in the township who speak Spanish at home.

CHART: Language Spoken at Home – Spanish, 2010-2016



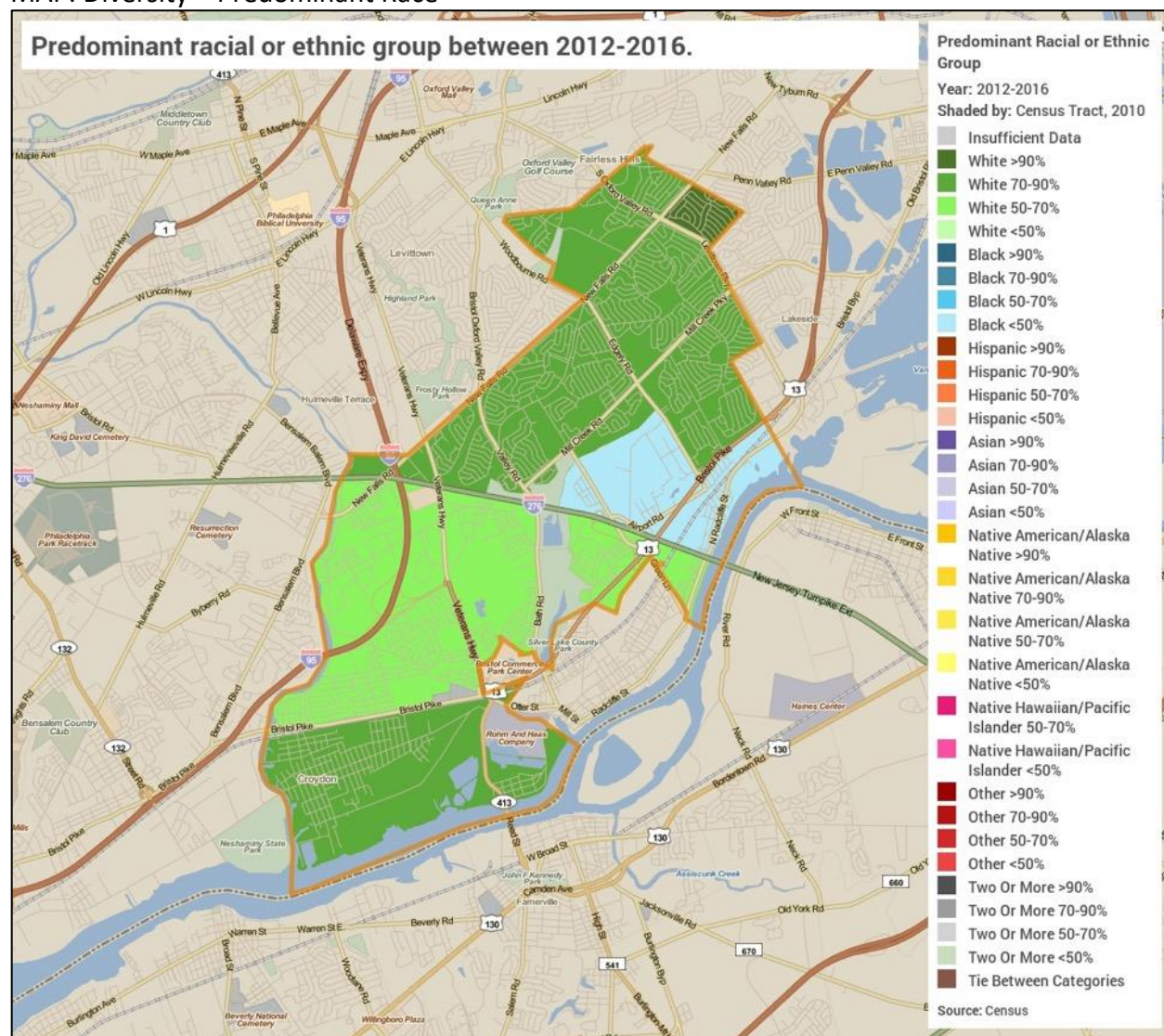
Data Source: 2006-2010 ACS – 2012-2016 ACS (S1601)

From 2012 to 2013, Bristol Township saw a decline in the percent of people who spoke Spanish at home, however since then it has been steadily rising. With the rate of individuals who identify as Hispanic expected to continue rising, it is also anticipated that the use of Spanish in the township will increase.

Diversity

The diversity map below provides a visual representation of the predominant race within Bristol Township. The township is predominantly White (84.1%) and there is a higher concentration of White residents in the northern and southern census tracts. Although race is just one factor affecting fair housing choice, it is a useful tool in understanding the demographics of individual tracts across the township.

MAP: Diversity – Predominant Race

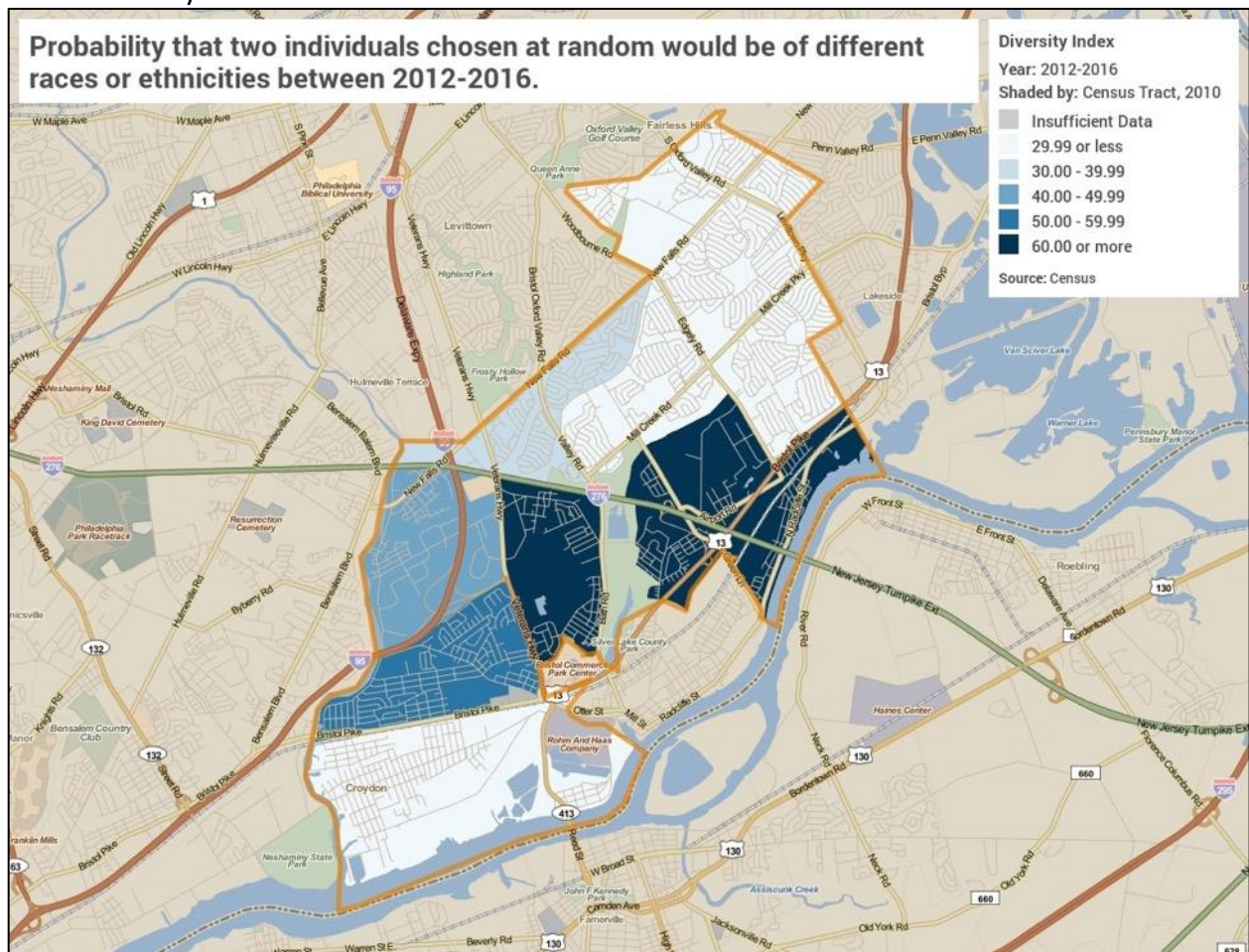


Source: 2012-2016 ACS via PolicyMap

The map below displays the Diversity Index ranking for census tracts in Bristol Township, based on data from Policy Map. As Policy Map explains: “The diversity index is an index ranging from 0

to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities between 2012-2016. Lower index values between 0 and 20 suggest more homogeneity (similar) and higher index values above 50 suggest more heterogeneity (diverse). Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers.” While Bristol Township is 84.1% White, the diversity index ranges across the township. The index score is lower in the northern and southern areas of the township (less diverse) than the central areas of the township (more diverse).

MAP: Diversity Index



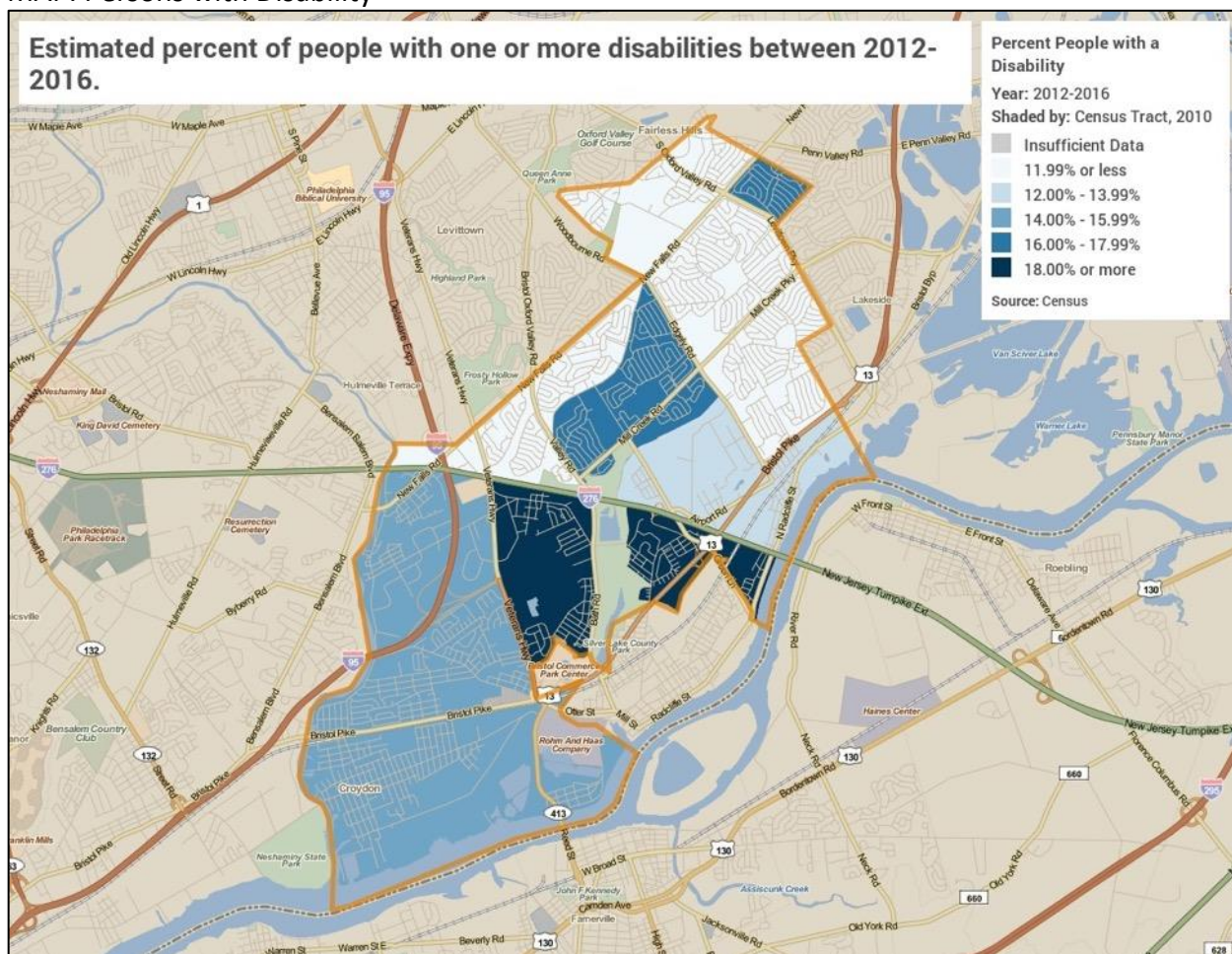
Source: 2012-2016 ACS via PolicyMap

Disability

In addition to having to overcome barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at much higher rates than the average person. An estimated 13.9 percent of the total population of Bristol Township (7,493 people) had a disability of some sort, and 80.5 percent of those in the labor force are employed. However, 61.7 percent of those aged 18 to 64 with a disability are not in the labor force. Unfortunately, accessible and affordable housing remains firmly out of reach for a large portion of the disabled population. (2012-2016 ACS 5-Year Estimates C18120)

The map below shows the distribution of people with a disability in Bristol Township. Like many of the variables studied in this analysis, the concentration of people with a disability is disproportionate across the township. Over 18 percent of the population in the central area has a disability.

MAP: Persons with Disability



Source: 2012-2016 ACS via PolicyMap

The following table provides data on the number of people with a disability in Bristol Township, broken down by age and compared to the state. In Bristol Township. In all age cohorts the Township has a greater percentage of the population with a disability than the state. As is typical across the state and the country, the elderly experience a higher rate of disability across the board in comparison to other age cohorts. There is a sharp increase the disability rate for those 75 years old and over.

TABLE: Disability and Age				
Age	Bristol Township	Percent of population in age group w/ a disability	Pennsylvania (state)	Percent of population in age group w/ a disability
Total Persons with a disability	7,493	13.9%	1,719,069	13.7%
Under 5 years	17	0.5%	5,119	0.7%
5 to 17 years	615	7.4%	135,055	6.8%
18 to 34 years	1,090	8.8%	191,221	6.8%
35 to 64 years	3,259	14.2%	679,794	13.5%
65 to 74 years	1,045	25.6%	270,576	23.8%
75 years and over	1,467	50.3%	437,304	47.8%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1810)				
Data Note: Percentages are the percent of disabled in each age group.				

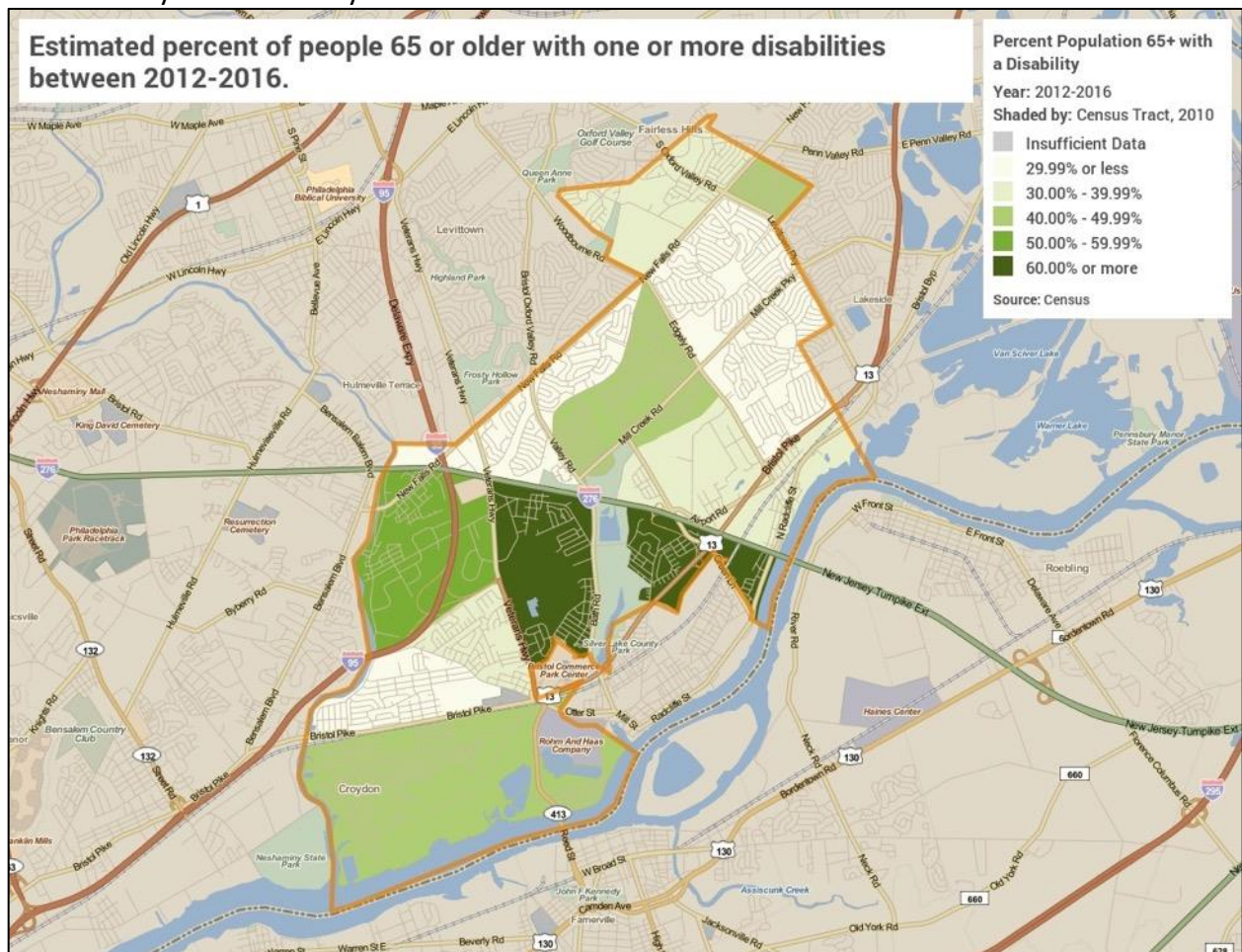
The following table provides data on the extent of disabilities among different racial and ethnic groups for both the township and the state as a whole. White residents in the Township have disabilities at a similar rate as the state and Black residents are less likely to have a disability in the Township than the state. American Indian and Alaska Native, Asian, and Multi-race residents experience disabilities at a higher rate, but these populations are relatively small in Bristol Township.

TABLE: Disability and Race				
Race	Bristol Township	Percent of race/ethnic group w/ a disability	Pennsylvania (state)	Percent of race/ethnic group w/ a disability
White	6,340	14.0%	1,401,443	13.6%
Black or African American	719	14.0%	214,124	15.9%
American Indian and Alaska Native	48	33.6%	5,552	23.2%
Asian	146	10.7%	25,546	6.4%
Native Hawaiian and Other Pacific Islander	0	0.0%	862	19.6%
Some other race	29	4.0%	36,263	14.6%
Two or more races	211	18.2%	35,279	12.6%
Hispanic or Latino (of any race)	380	7.4%	113,688	13.8%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1810) Data Note: Percentages are the percent of disabled in each race group.				

For many people, the struggle to find affordable housing is compounded by the need for housing that can accommodate a disability – particular for the elderly, the unemployed, and people living in poverty.

The following series of maps highlights the geographical distribution of the disabled population across differing variables. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

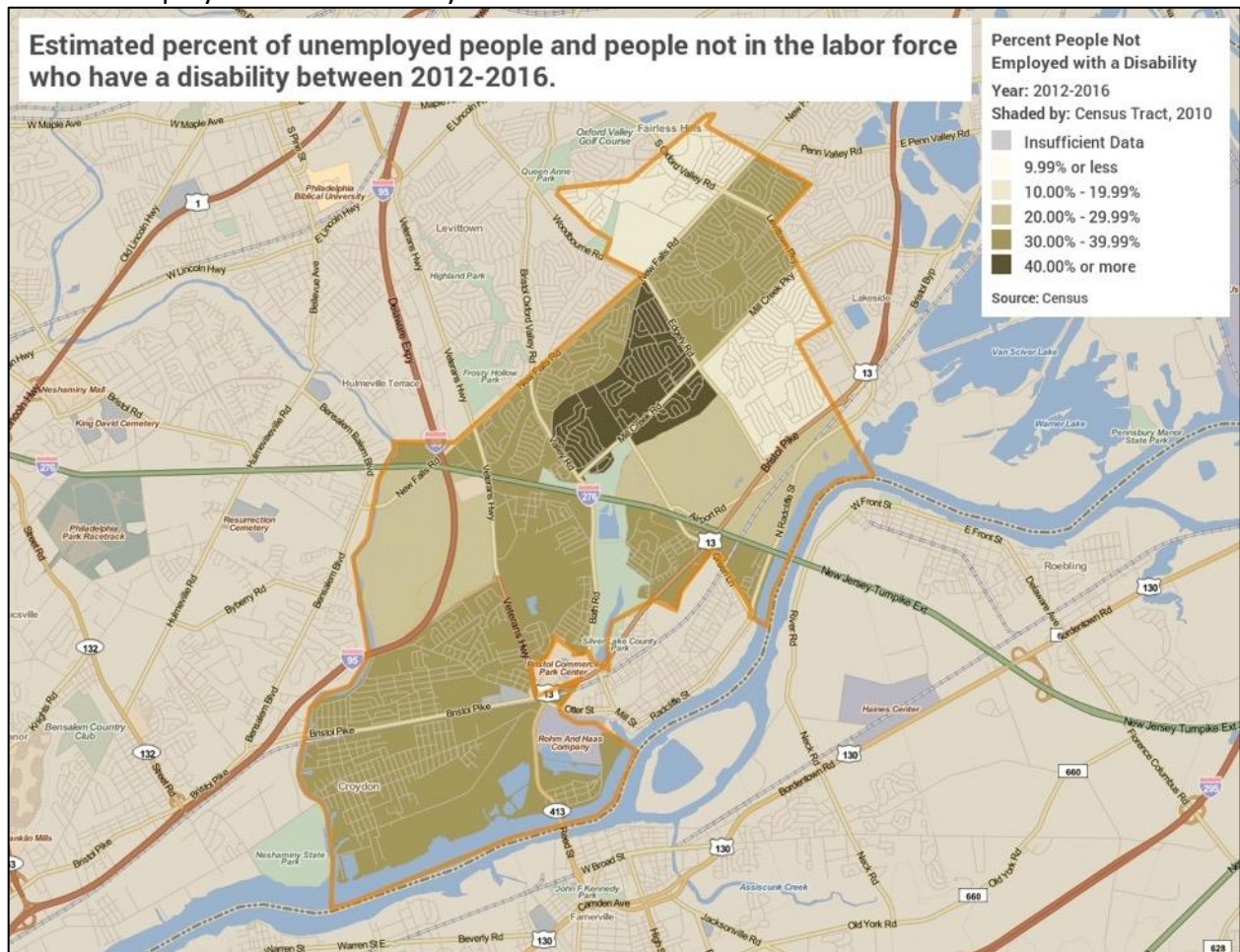
MAP: Elderly with Disability



Source: 2012-2016 ACS via PolicyMap

The area with the highest percent of elderly living with a disability is in the central parts of Bristol Township west of I-95, east of highway 413 and north of highway 13 near Silver Lake County Park. Over 60 percent of the elderly population has a disability in this area. In general, there is a higher percentage of elderly living with a disability than all other age groups, and in many areas of the township over 40 percent of elderly are living with a disability.

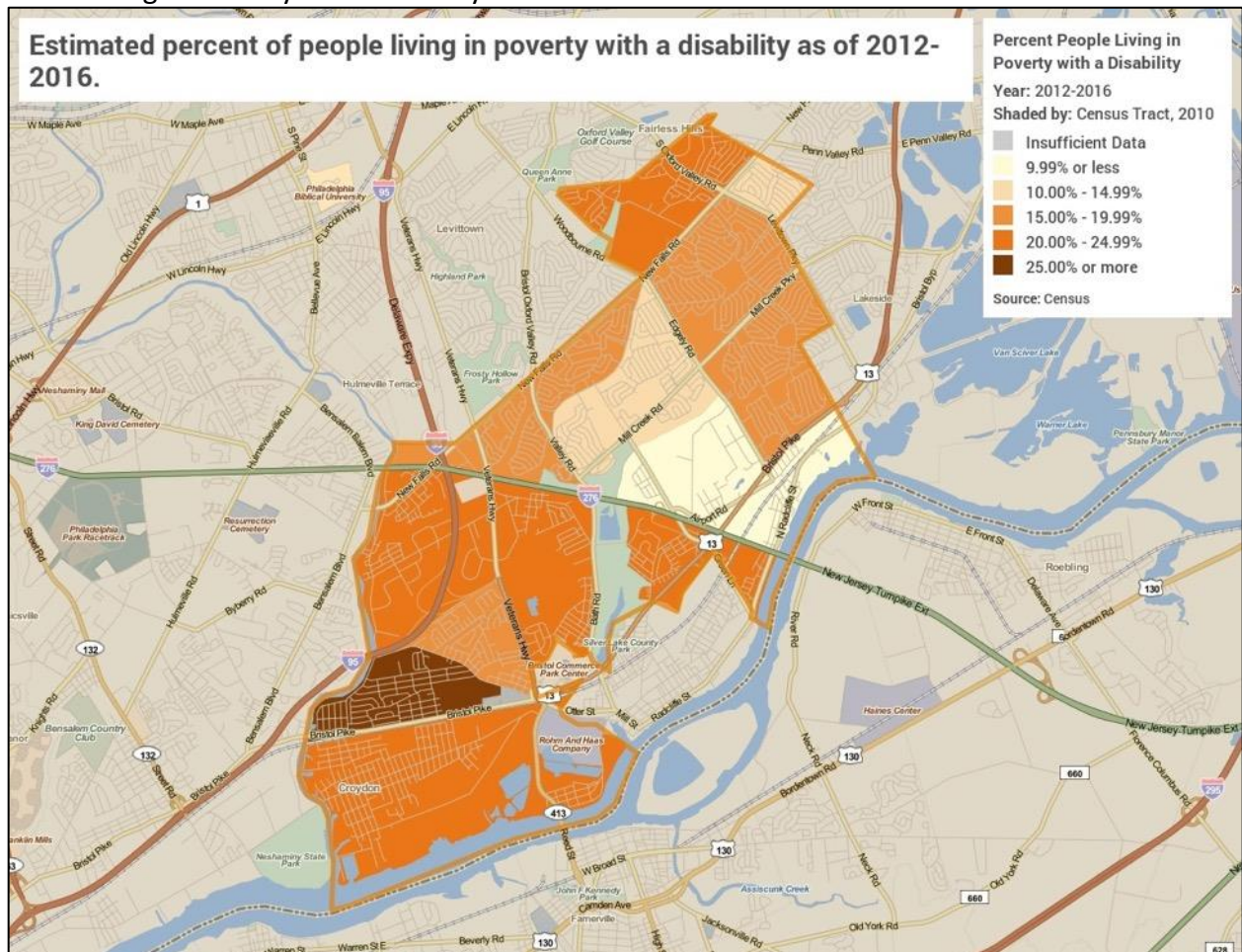
MAP: Unemployed with a Disability



Source: 2012-2016 ACS via PolicyMap

Residents with a disability are less likely to be in the labor force and employed than residents without a disability. Throughout most of the Township, 30 percent or more of the people with a disability are not employed. In one census tract that rate is over 40 percent.

MAP: Living in Poverty with Disability



Source: 2012-2016 ACS via PolicyMap

Similar to unemployment, the rate of poverty is higher for residents with a disability than those without one. The poverty rate for the population with a disability is over 15 percent throughout most of the township and over 25 percent in one census tract on the west side.

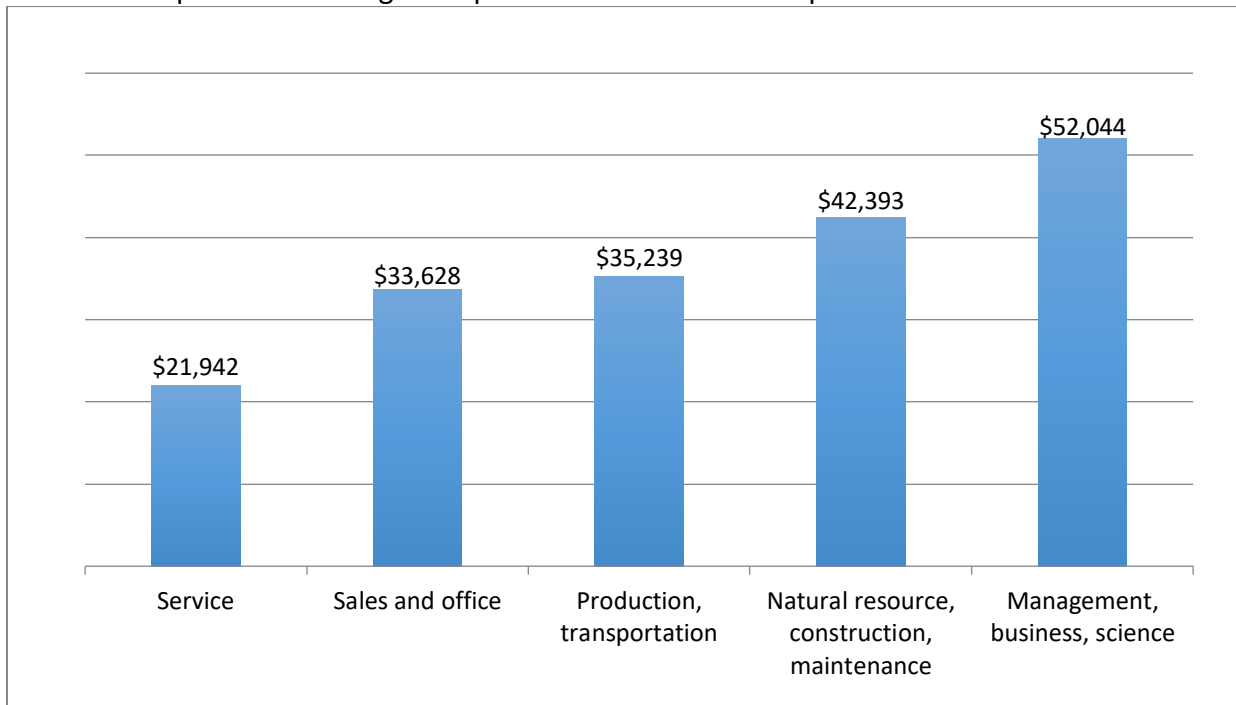
Income

According to 2012-2016 American Community Survey figures, the median household income (MHI) in Bristol Township was \$59,167. This was more than the statewide MHI of \$54,895. However, MHI grew from 2000 to 2016 in the township (23%) at a slower rate than the state as a whole (36.9%).

TABLE: Median Household Income			
City/State	2000	2016	Percent Change 2000-2016
Bristol Township	48,090	59,167	23.0%
Pennsylvania (state)	40,106	54,895	36.9%
Source: 2000 Census & 2012-2016 American Community Survey 5-Year Estimates (DP03)			

The townshipwide median household income can be affected by any number of variables in Bristol Township, but the difference in the type of jobs in the township compared to the state is particularly noteworthy. As discussed in more detail in the Industry and Jobs section, the largest industry is Education and Health Care Services with 19.8 percent, which is noticeably lower than the state estimate of 25.9 percent. Bristol Township has a higher rate of jobs in Retail Trade and Manufacturing than the state averages.

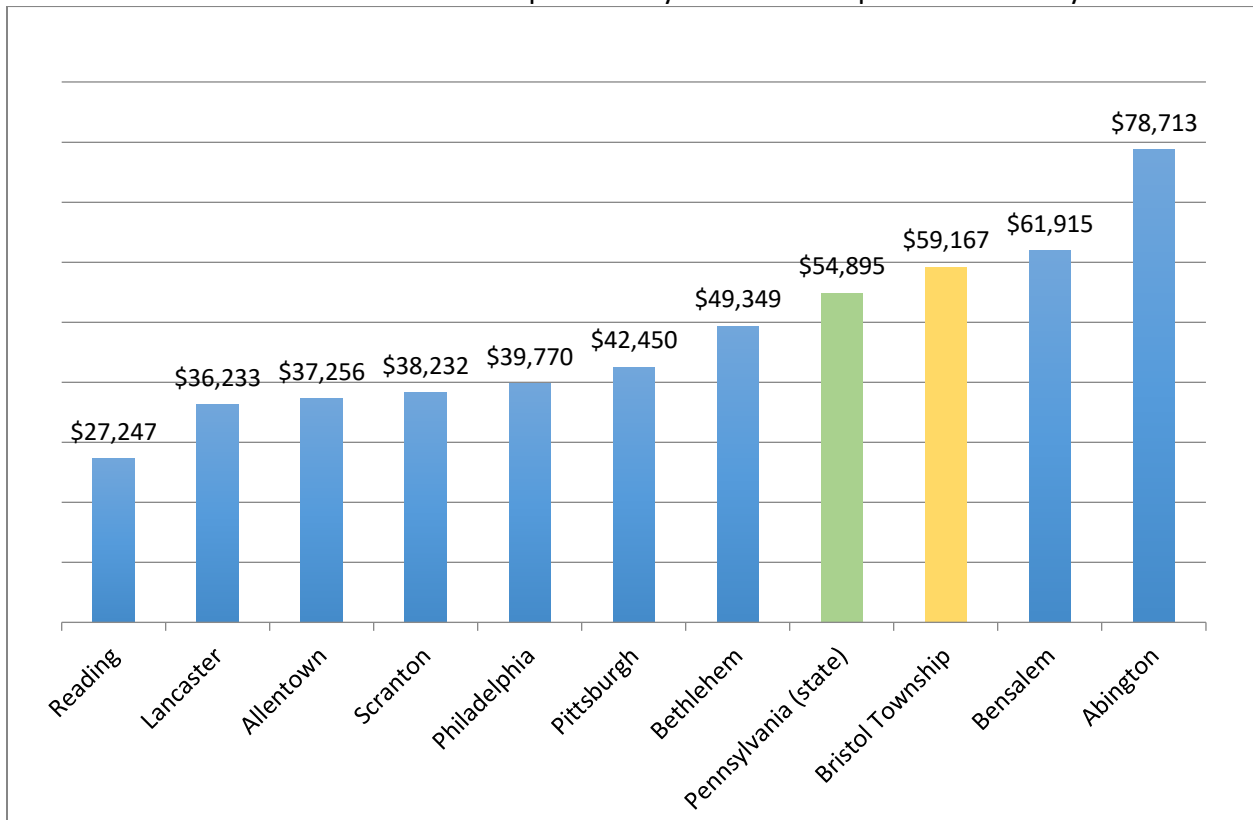
CHART: Occupation & Earnings Comparison in Bristol Township 2016



Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S2411)

It must be noted that comparing median household incomes and median earnings is not a “like for like” equation – households may have a combination of persons earning income, whereas median income is tied to the income of one person. However, these two figures, considered in combination, can be a useful indicator of income in the township.

CHART: Median Household Income Comparisons by Select Municipalities in Pennsylvania 2016

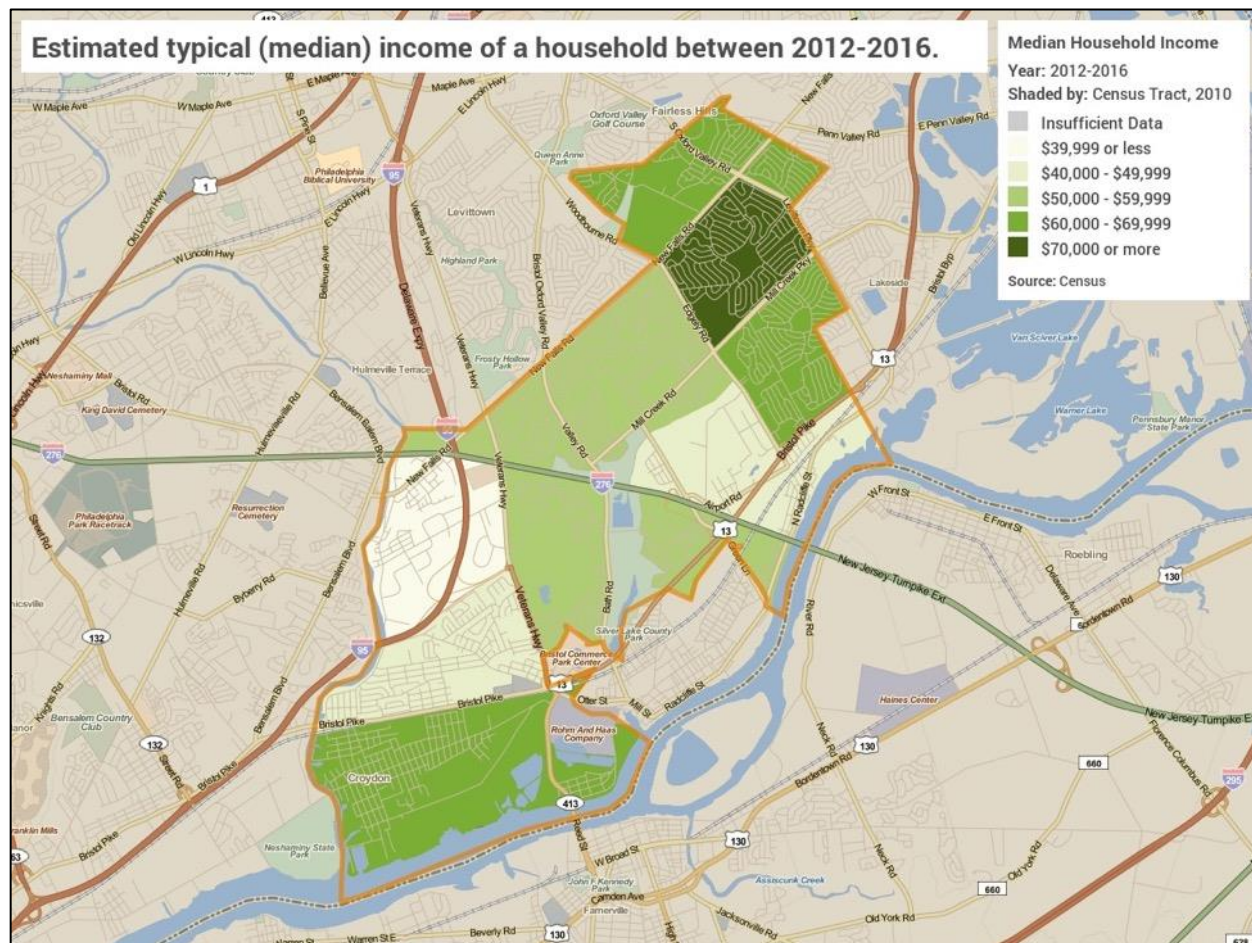


Data Source: 2012-2016 American Community Survey 5-Yr Estimates

Bristol Township has a higher median household income average than the state as a whole. The chart above compares Bristol Township to a select few other cities in the state. Bristol has the third highest MHI of the municipalities compared and is lower than only Bensalem and Abington.

The map below displays the geographical distribution of median household income throughout Bristol Township. Lighter colored shades represent areas with lower MHI, and darker shades represent areas with higher MHI. There is a clear concentration of wealth in eastern areas, which includes the only census tract where MHI is \$70,000 or more. On the opposite end of the spectrum, the western side of the township has a census tract with an MHI of less than \$40,000.

MAP: Median Household Income

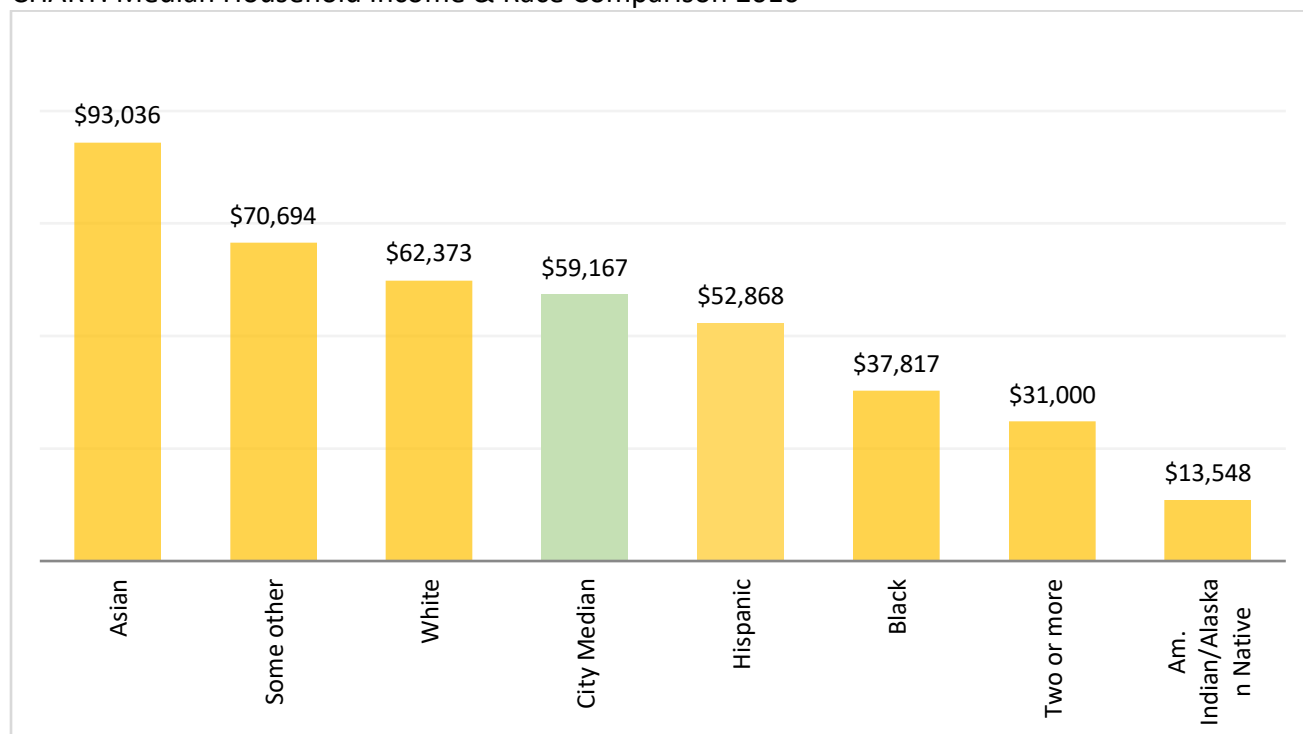


Source: 2012-2016 ACS via PolicyMap

Income and Race

While the 2016 townshipwide median household income (MHI) was approximately \$59,167, there was a significant disparity among different racial and ethnic groups in the township. White residents, the largest racial group by far in Bristol Township, had an MHI slightly higher than the townshipwide median with \$62,373. Black residents, the second most populous racial group, had a significantly lower MHI, \$37,817. The chart below displays the difference of MHI between all races in the township.

CHART: Median Household Income & Race Comparison 2016

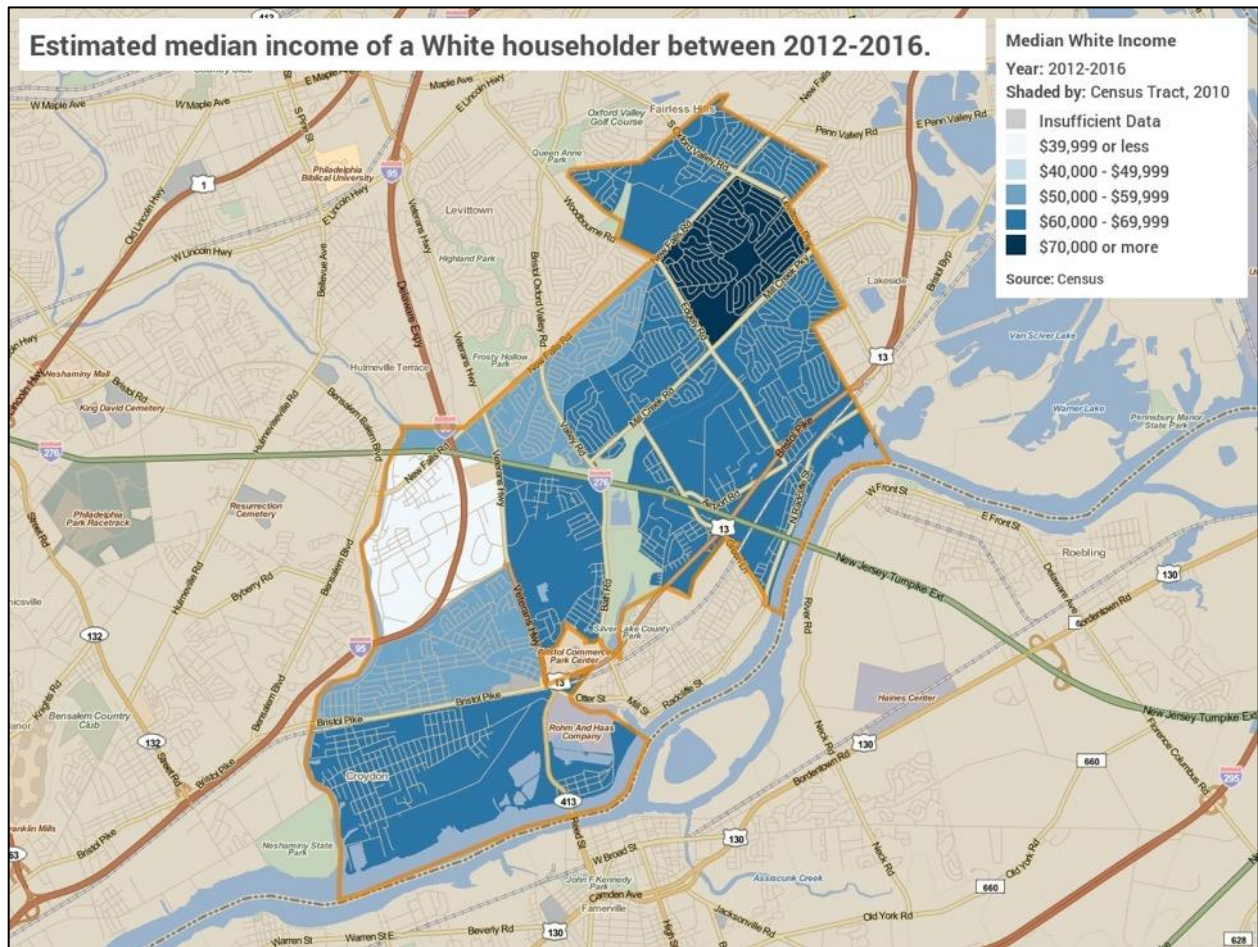


Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S1903)

Data Notes: Data was not available for Native Hawaiian/Pacific Islanders.

The following two maps display racial and ethnic groups and the distribution of median household income in Bristol Township. Lighter shaded areas represent areas where the groups have lower MHIs and darker shaded areas represent areas where the groups have higher MHIs.

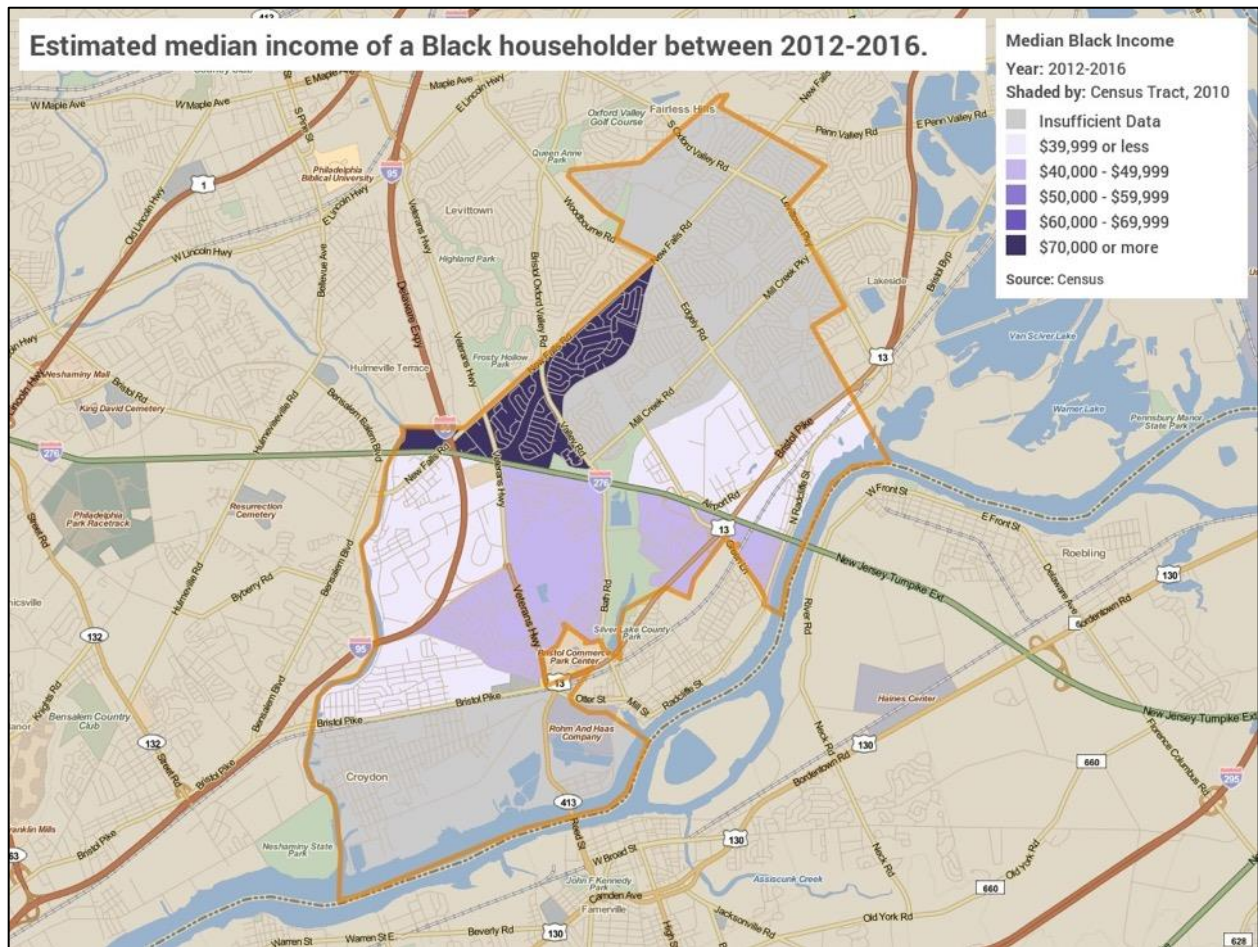
MAP: Median Household Income – White Households



Source: 2012-2016 ACS via PolicyMap

One area in particular has a very low MHI in comparison to the rest of Bristol Township for White households. On the west side, one census tract has a White household MHI of less than \$40,000. Just a few miles to the northwest, White households have an MHI of \$70,000 or more.

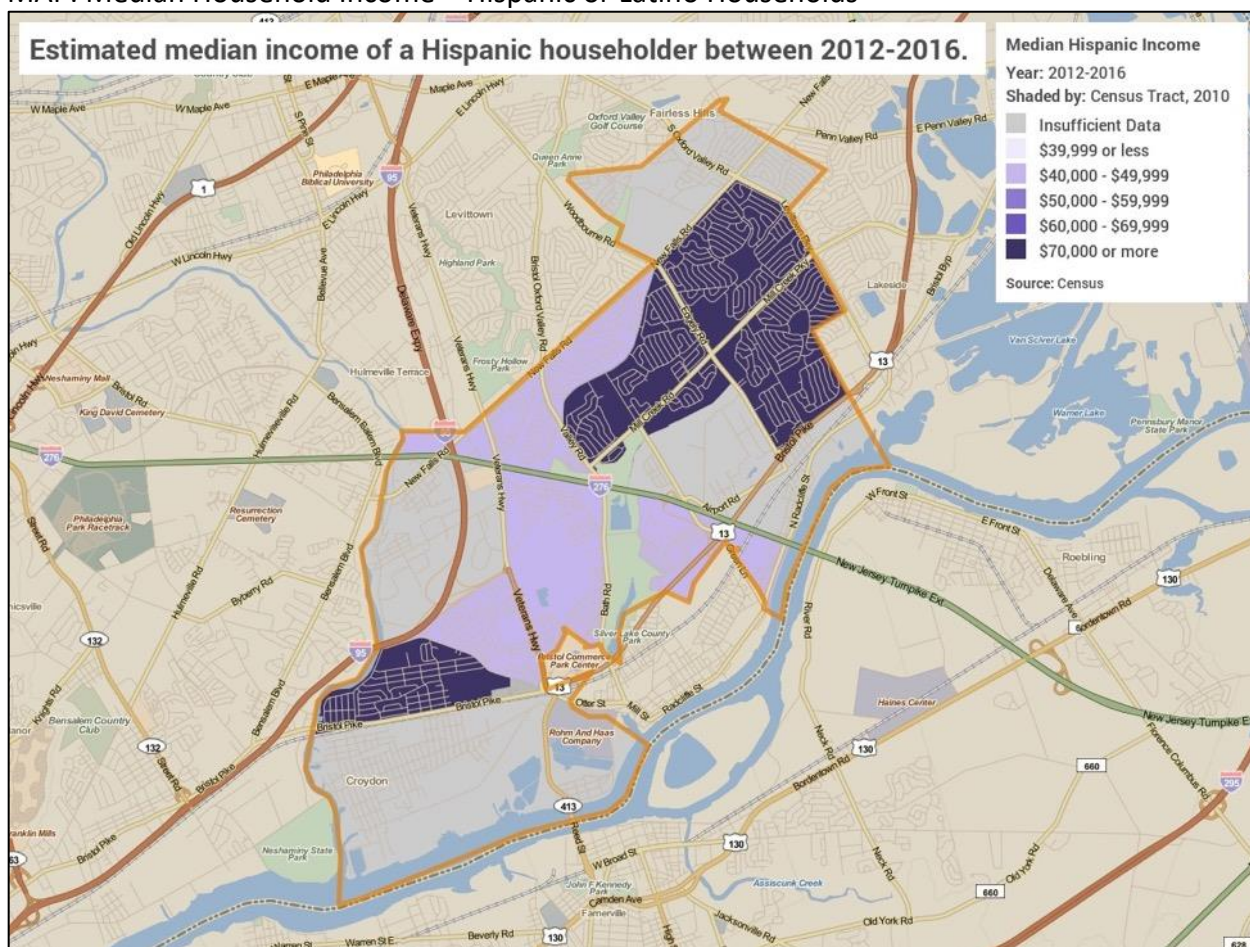
MAP: Median Household Income – Black Households



Source: 2012-2016 ACS via PolicyMap

Black households make up 10.7 percent of the population and have an MHI of \$37,817. Due to the relatively small size of the population there is insufficient data for several census tracts. Black households in the north central census tracts have the highest MHI, \$70,000 or more. However, in most of the census tracts the MHI is less than \$40,000 for Black households.

MAP: Median Household Income – Hispanic or Latino Households



Source: 2012-2016 ACS via PolicyMap

Hispanic residents make up 6.6 percent of the household population and have an MHI of \$52,868. Due to the relatively small size of the population there is insufficient data for several census tracts and the margin of error is somewhat large. However, given those restraints there are still patterns where higher MHI households are predominantly found in the western and eastern edges of the Township. These tracts have an MHI of \$70,000 or more for Hispanic households.

There was insufficient data to provide income distribution maps for MHI for all other race groups.

Poverty

According to 2012-2016 American Community Survey figures, the poverty rate for all individuals in Bristol Township was 8.9 percent, which was lower than the statewide rate of 13.3 percent. From 2000 to 2016 the poverty rate in the township increased 17.1 percent; during the same time period the state poverty rate grew 20.9 percent.

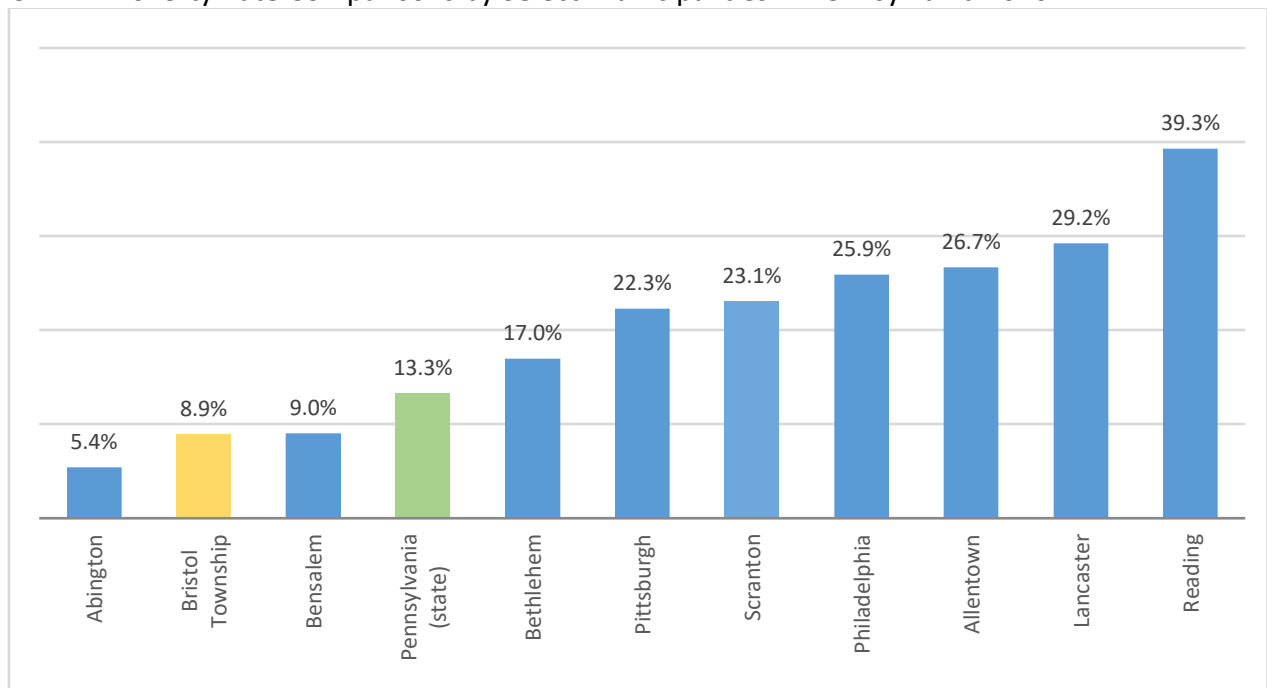
TABLE: Poverty Rate

City/State	Percentage of population in poverty 2000	Percentage of population in poverty 2016	Percent change 2000-2016
Bristol Township	7.6%	8.9%	17.1%
Pennsylvania (state)	11.0%	13.3%	20.9%

Source: Census 2000, 2012-2016 American Community Survey 5-Year Estimates (S1701)

Bristol Township has a poverty rate lower than the state as a whole and many select municipalities. Abington has the lowest poverty rate with 5.4 percent and Reading has the highest with nearly 40 percent.

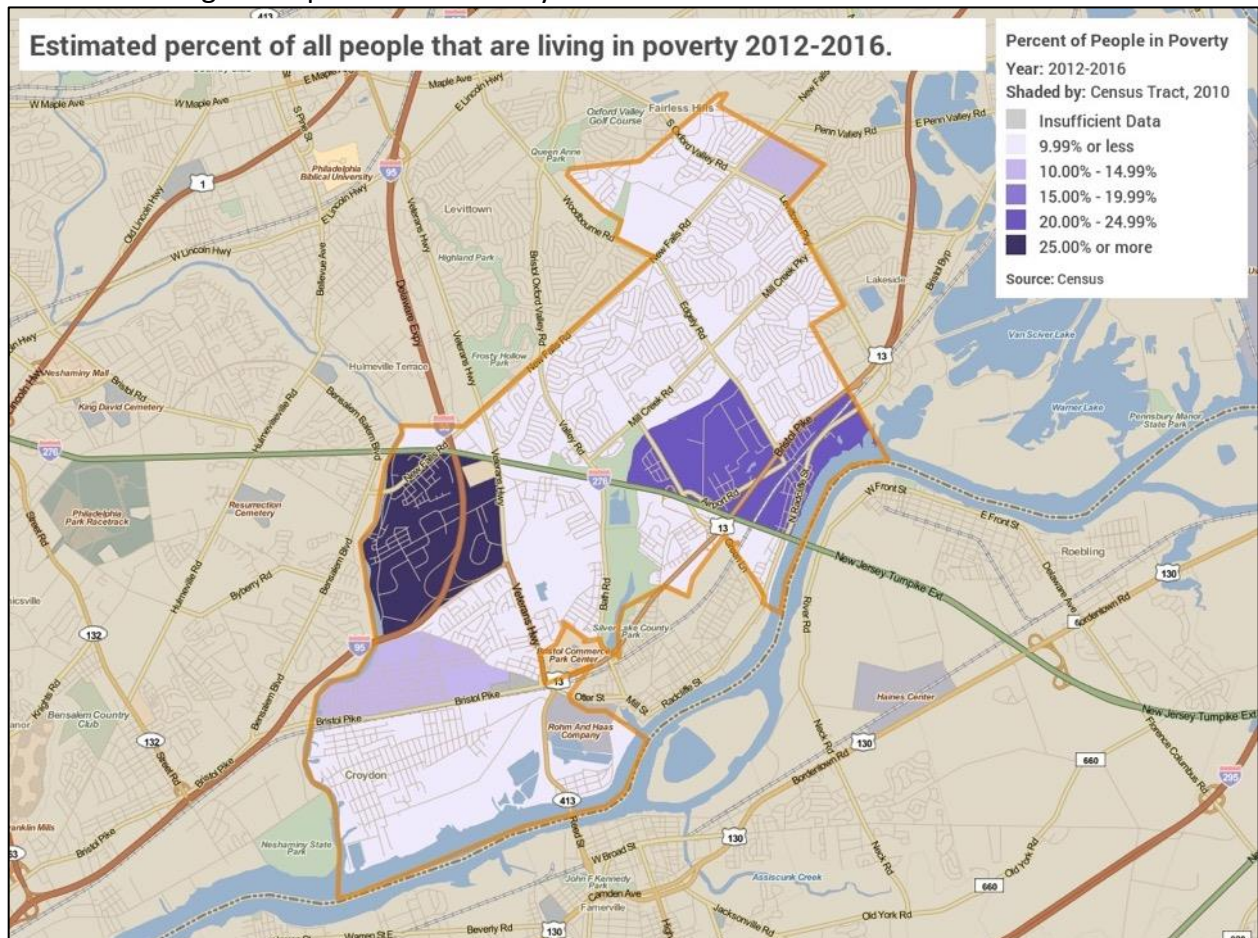
CHART: Poverty Rate Comparisons by Select Municipalities in Pennsylvania 2016



Data Source: 2012-2016 American Community Survey 5-Yr Estimates

The following series of maps displays the geographical distribution of poverty throughout Bristol Township. The lighter shaded areas represent a smaller percent of families in poverty and the darker shaded areas represent a higher percent of families in poverty.

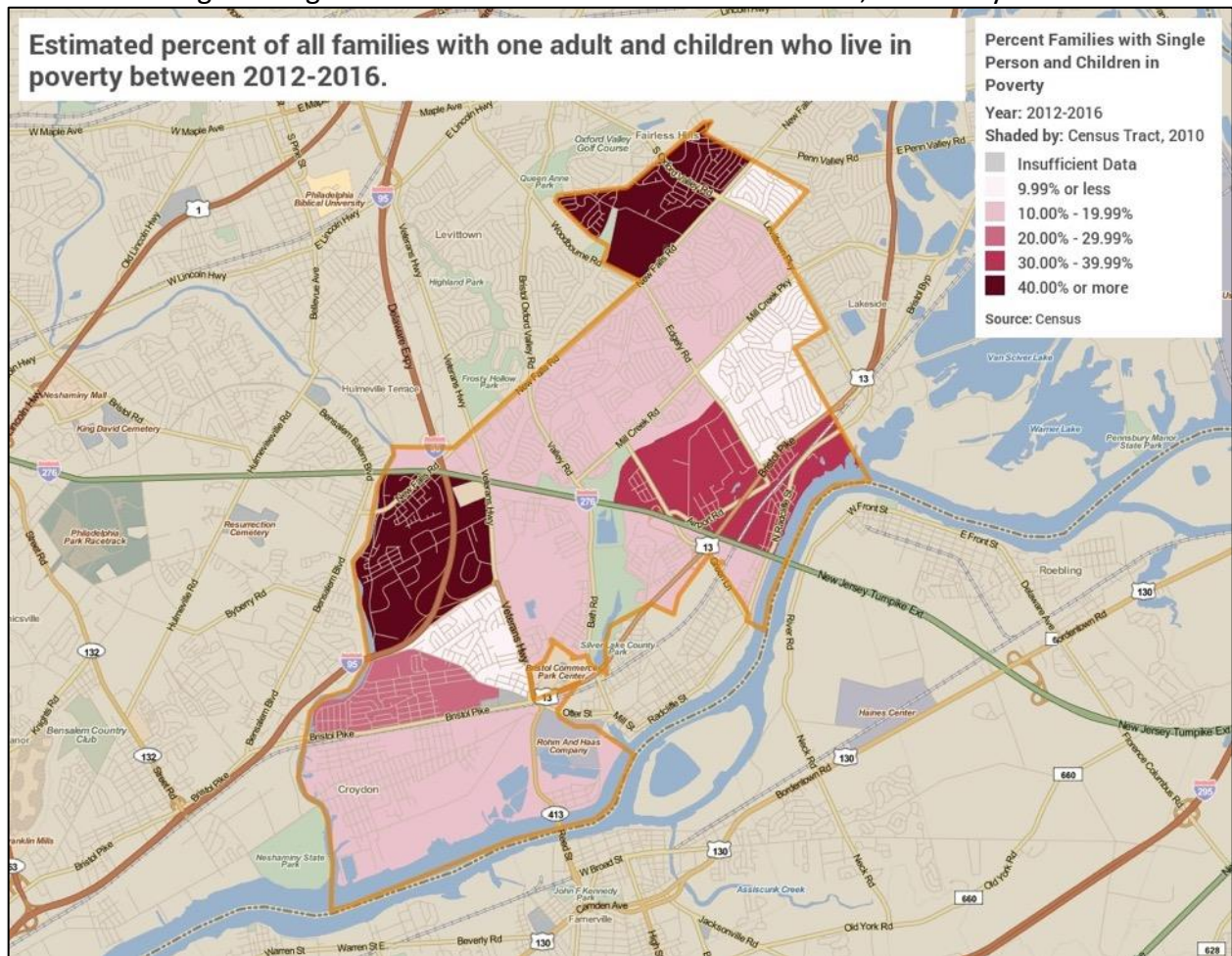
MAP: Percentage of Population in Poverty



Source: 2012-2016 ACS via PolicyMap

Census tracts in the western and central east of Bristol Township have the highest poverty rate, over 20 percent. Throughout the rest of the township the poverty rate is generally less than 10 percent.

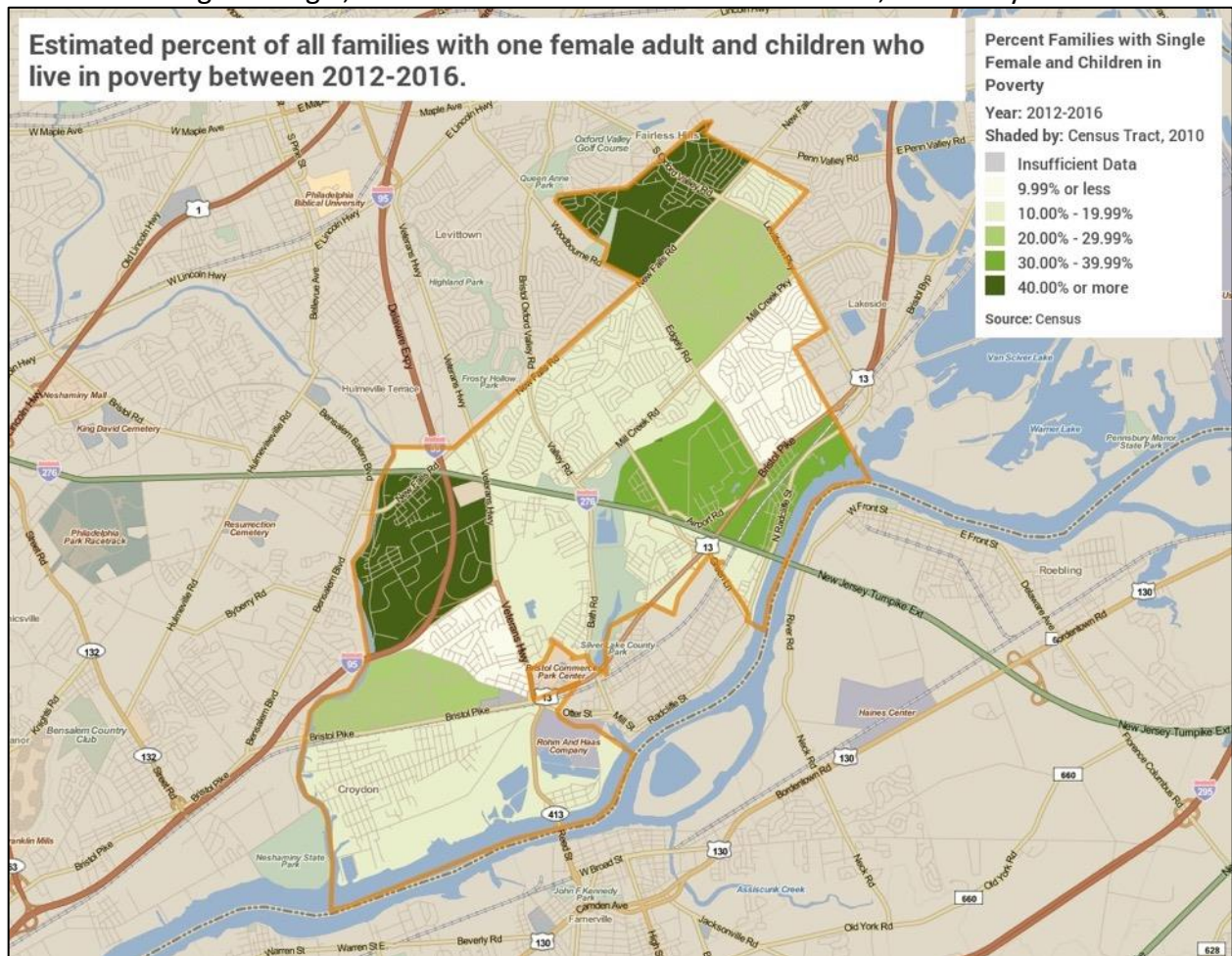
MAP: Percentage of Single Adult Head of Households with Children, in Poverty



Source: 2012-2016 ACS via PolicyMap

There are high concentrations of single-headed families with children in poverty in the north and western areas of the township. These areas have a poverty rate of single-parent families of 40 percent or more.

MAP: Percentage of Single, Female Head of Household with Children, in Poverty



Source: 2012-2016 ACS via PolicyMap

High concentrations of single female-headed families with children in poverty are located throughout the township in similar areas as single-headed families with children in poverty (from previous map). The rates in these high poverty tracts is over 40 percent.

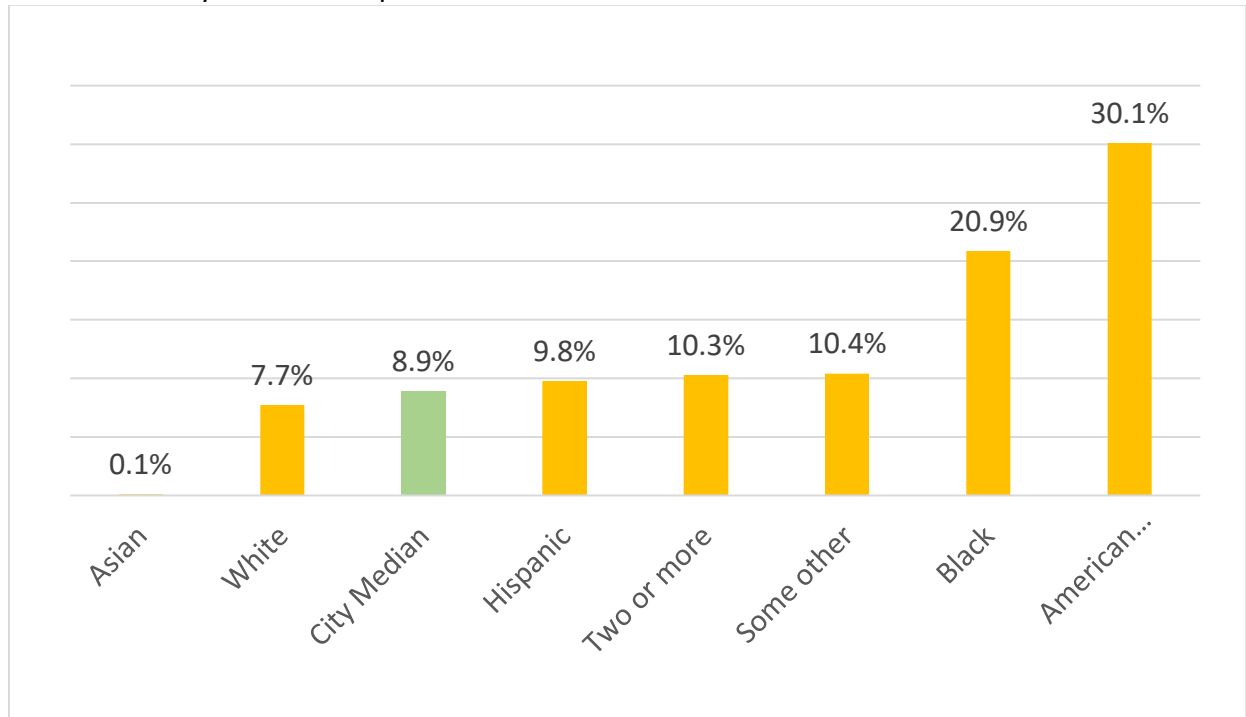
Poverty and Race

The 2016 township wide poverty rate was 8.9 percent, but there was significant disparity among differing racial and ethnic groups. Whites residents had a slightly lower poverty rate than the townshipwide rate with 7.7 percent. In comparison, Black, American Indian and Alaska Native, and Two or more race individuals had higher rates than other racial groups. Additionally, Hispanic households had a poverty rate slightly higher than the township, as well.

TABLE: Poverty and Racial / Ethnic Composition		
Race	Estimate	Percentage
White	3,465	7.7%
Black or African American	1,086	20.9%
American Indian and Alaska Native	43	30.1%
Asian	2	0.1%
Native Hawaiian / Other Pacific Islander	0	-
Some other race	76	10.4%
Two or more races	119	10.3%
Hispanic or Latino (of any race)	502	9.8%
Bristol Township	4,791	8.9%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1701)		
Data Note 1: Percentages are the percent of people in poverty within the race/ethnic group.		
Data Note 2: Hispanic and Latino identify as an ethnic group.		

The following chart visually compares the 2016 poverty rate of all races and individuals that identify ethnically as Hispanic against the townshipwide poverty rate.

CHART: Poverty & Race Comparison

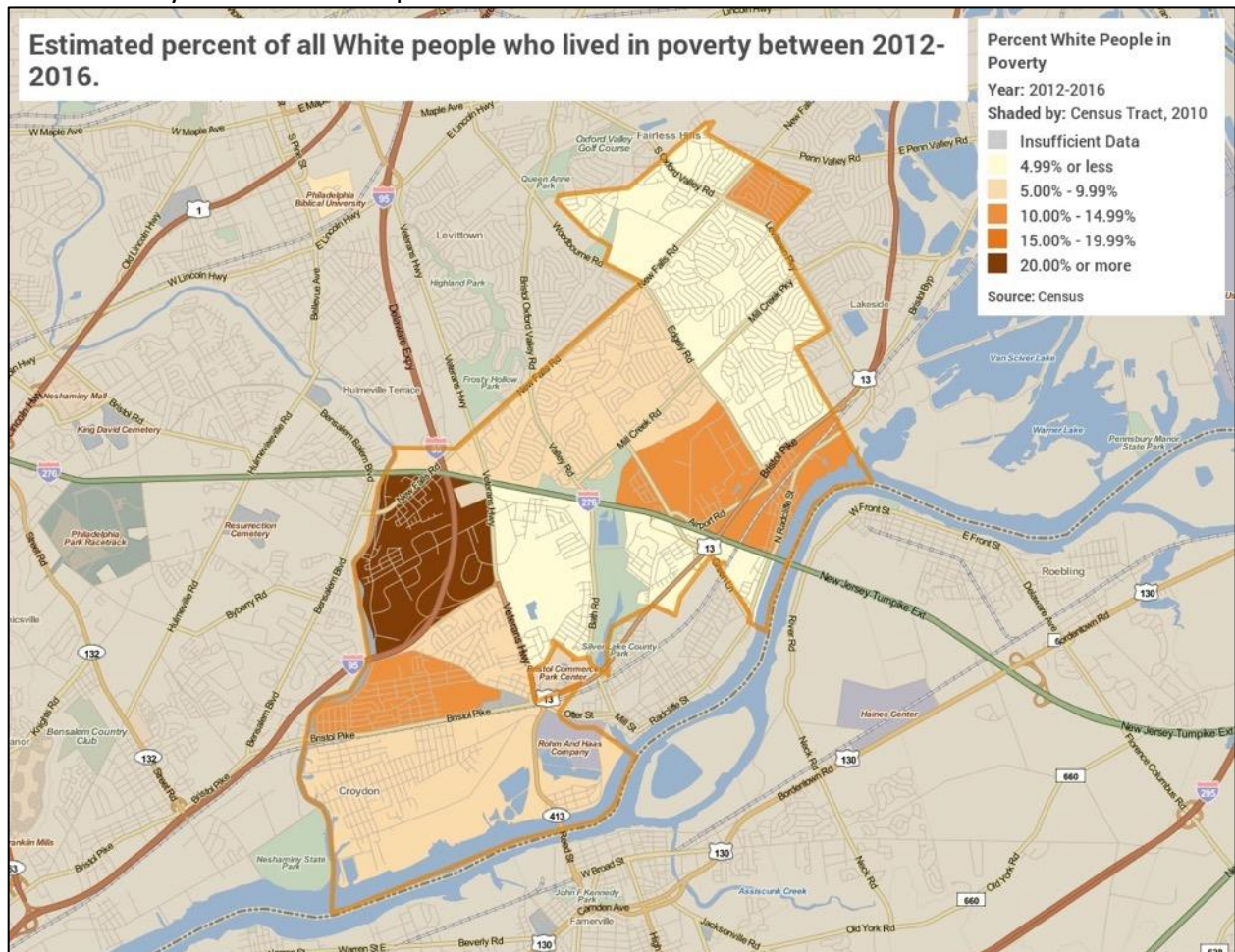


Data Source: 2012-2016 American Community Survey 5-Yr Estimates

While the townshipwide poverty rate was 8.9 percent in 2016, American Indians and Alaskan Natives had a drastically disproportionate poverty level as compared to the rest of Bristol Township at 30.1 percent. Black households also had a disproportionately high poverty rate, 20.9 percent.

The following series of maps displays the poverty rate based on race or ethnicity. Lighter shaded areas represent areas where the particular groups have lower rates of poverty and darker shaded areas represent areas where the groups have higher poverty rates.

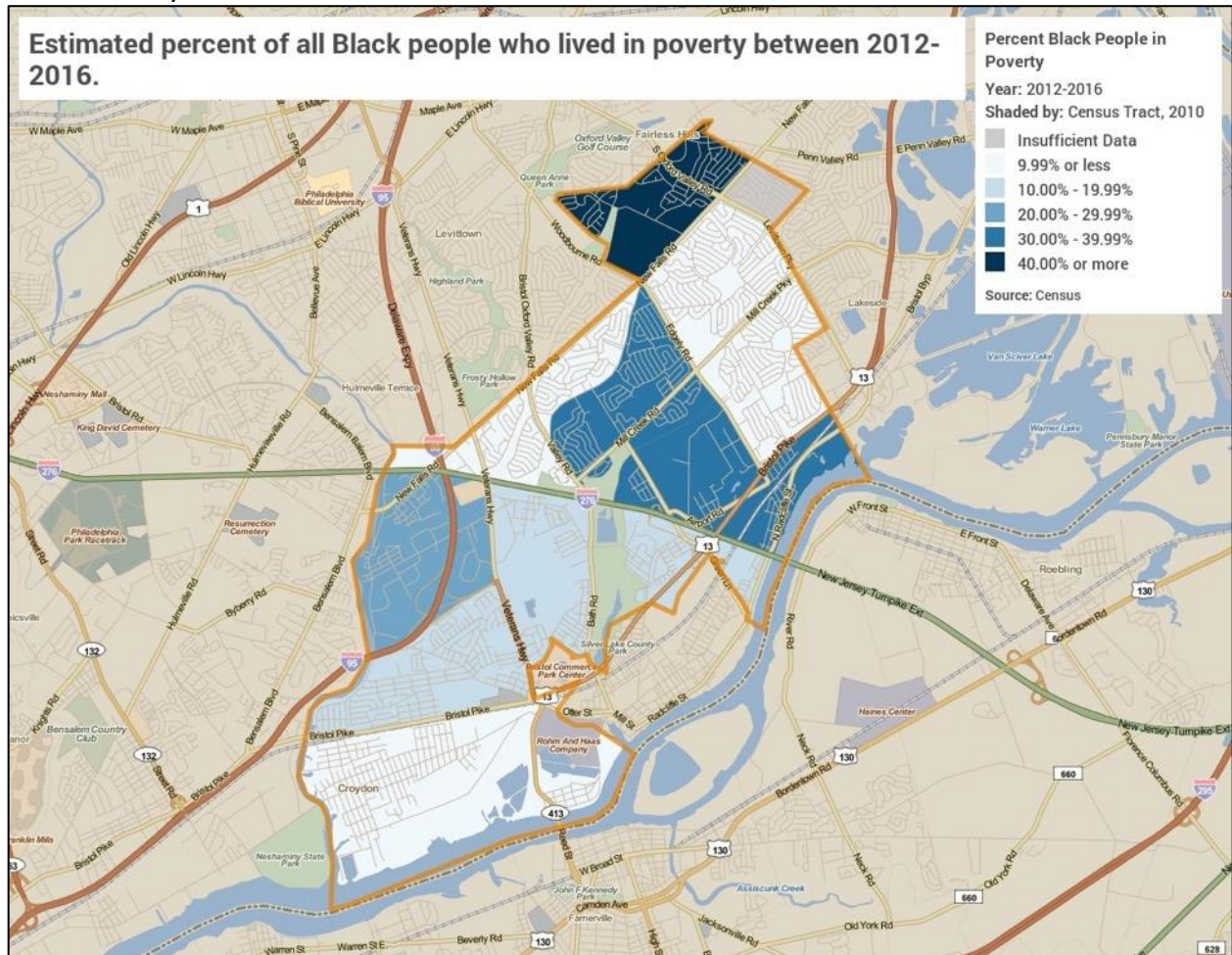
MAP: Poverty Rate – White Population



Source: 2012-2016 ACS via PolicyMap

Poverty rates were highest for White Americans in the western tracts of the Township. The poverty rate there was 20 percent or more.

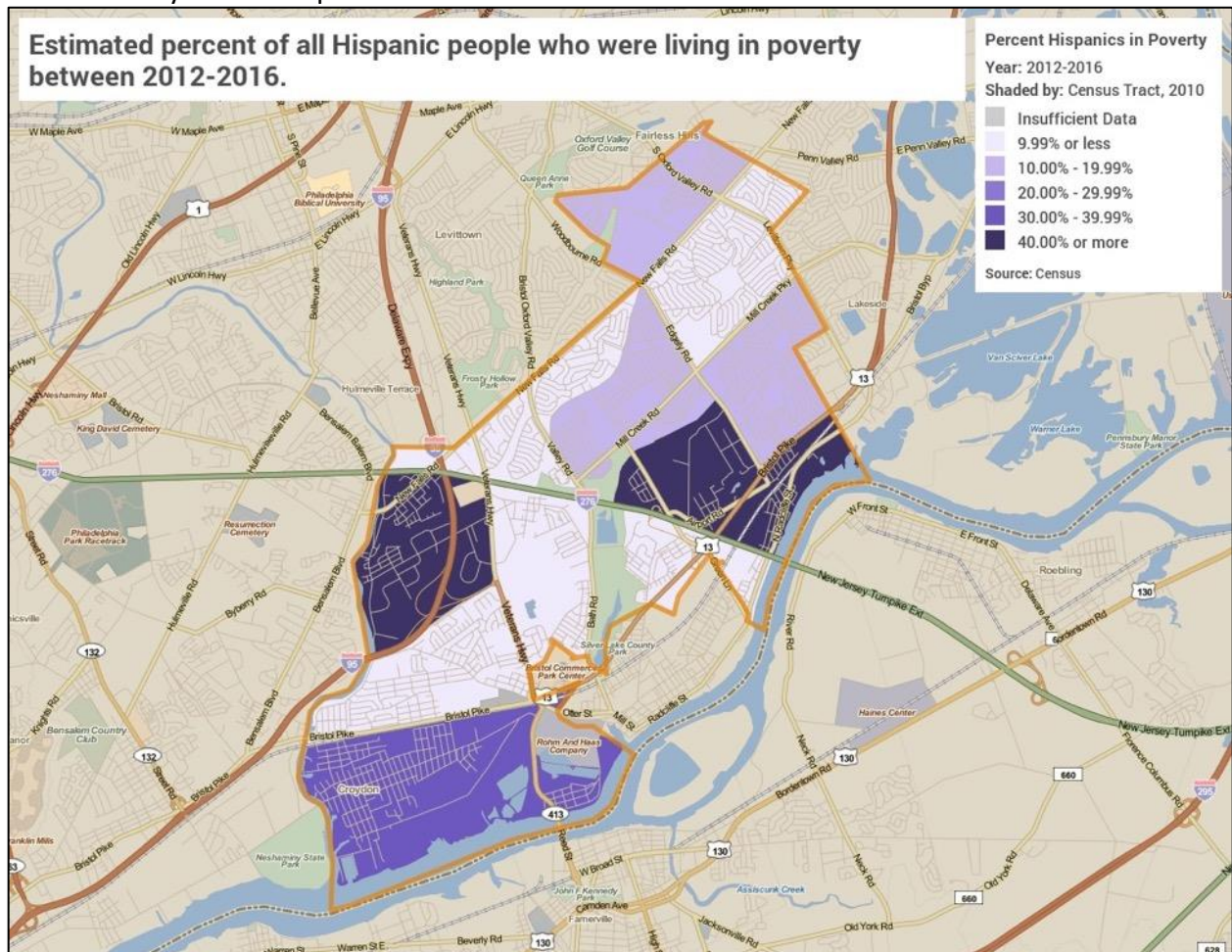
MAP: Poverty Rate – Black



Source: 2012-2016 ACS via PolicyMap

Poverty rates for black residents is disproportionately high in the northeast part of the township. These tracts have poverty rates of 40% or more.

MAP: Poverty Rate – Hispanic or Latino



Source: 2012-2016 ACS via PolicyMap

Hispanic or Latino persons had higher poverty rates in the central eastern and western tracts. For this ethnic group, tracts with high poverty rates were 40 percent or higher.

There was insufficient data to accurately map poverty for the other racial groups due to low population sizes.

Employment

According to the Bureau of Labor Statistics, the unemployment rate for all individuals in Bristol Township was 5.6 percent in 2017. This is 0.7 percent higher than the state unemployment rate. From 2010-2017 the unemployment rate in the township decreased 41.7 percent; during the same time period the statewide unemployment rate decreased by 42.4 percent. Bristol Township and Pennsylvania, like the rest of the country, were hit hard by the Great Recession of 2007-2009, but Bristol Township has recovered significantly.

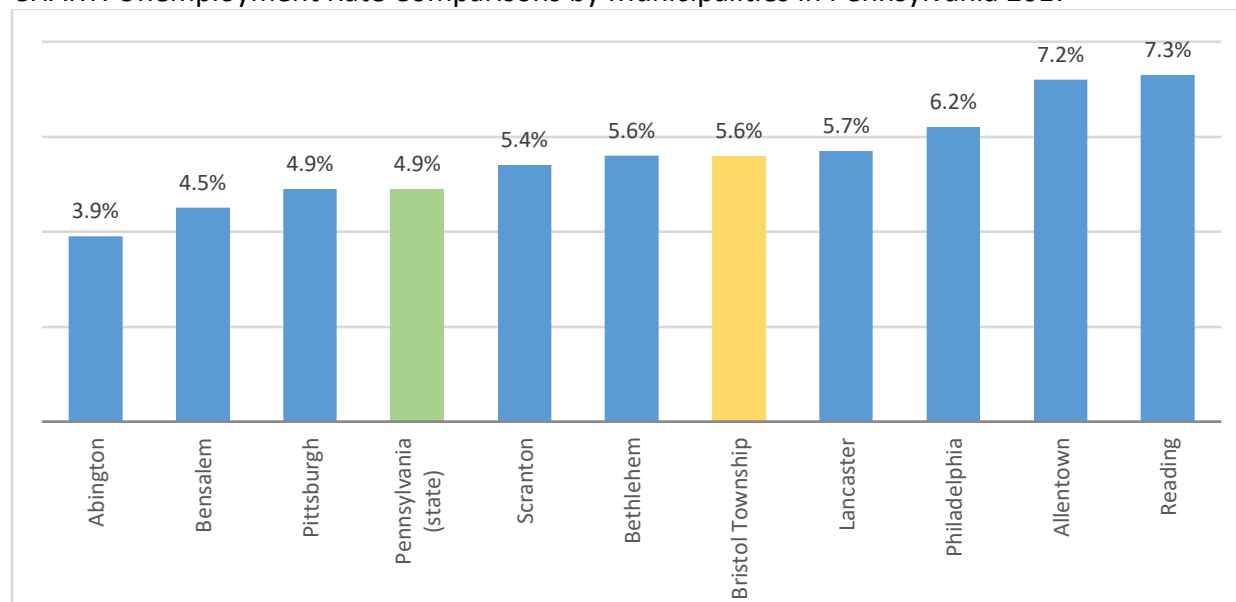
TABLE: Unemployment Rates

Area	2010	2011	2012	2013	2014	2015	2016	2017	% Change 2010-2017
Bristol Township	9.6	9.7	9.5	8.6	6.9	6.0	5.9	5.6	-41.7
Pennsylvania (state)	8.5	7.9	7.8	7.4	5.9	5.3	5.4	4.9	-42.4

Source: Bureau of Labor Statistics, 2010-2017

The following chart compares the unemployment rate of Bristol Township (5.6%) against other major cities in Pennsylvania including the statewide rate (4.9%). While Bristol Township has a higher unemployment rate than the statewide rate, it is similar to many other municipalities.

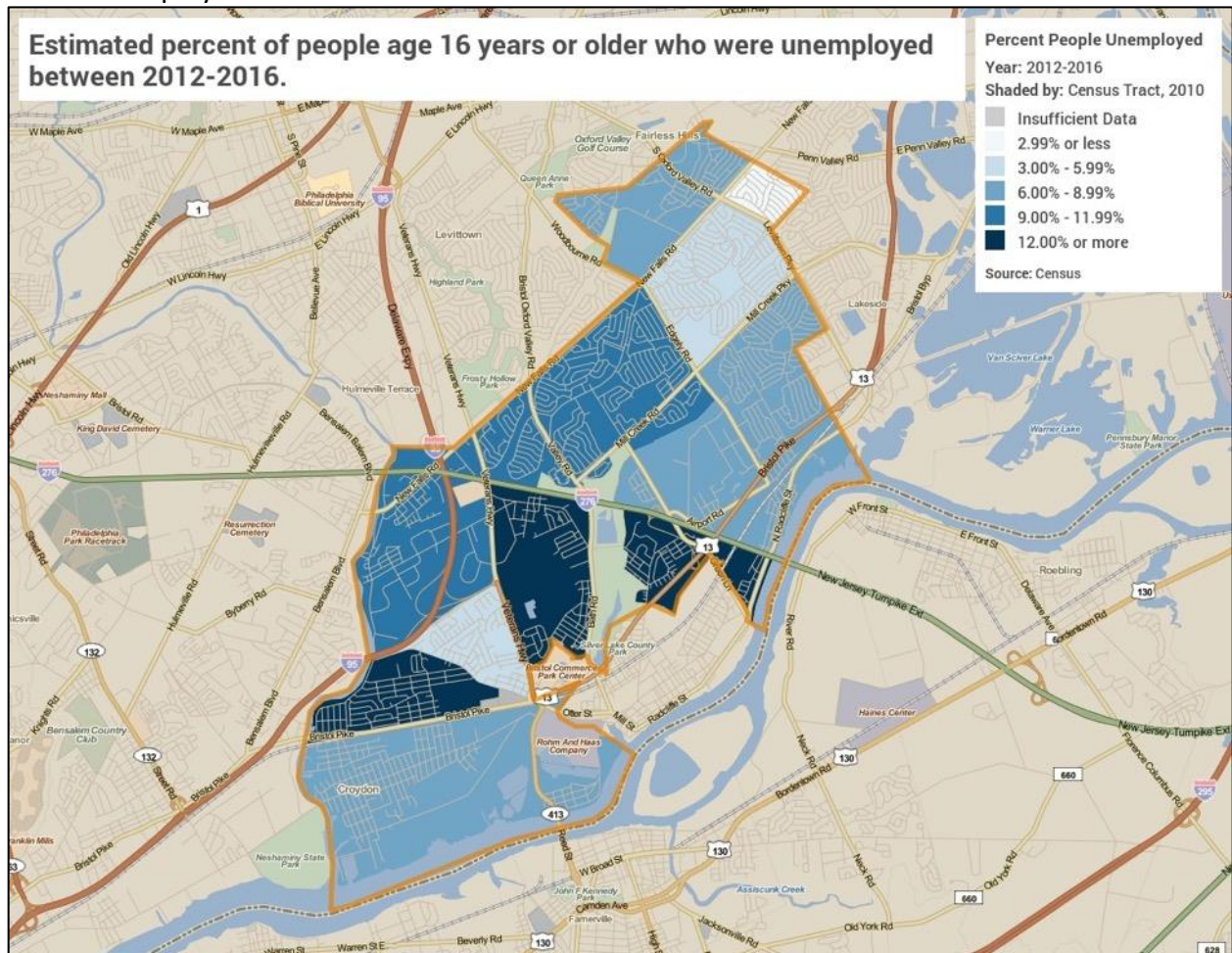
CHART: Unemployment Rate Comparisons by Municipalities in Pennsylvania 2017



Data Source: Bureau of Labor Statistics, 2017

The map below shows the geographical distribution of the unemployment rate throughout Bristol Township. The lightest shade of blue represents areas with the lowest unemployment rate, and the unemployment rate increases as the shade darkens. According to the 2012-2016 ACS, three tracts throughout Bristol Township have an unemployment rate of 12 percent or higher.

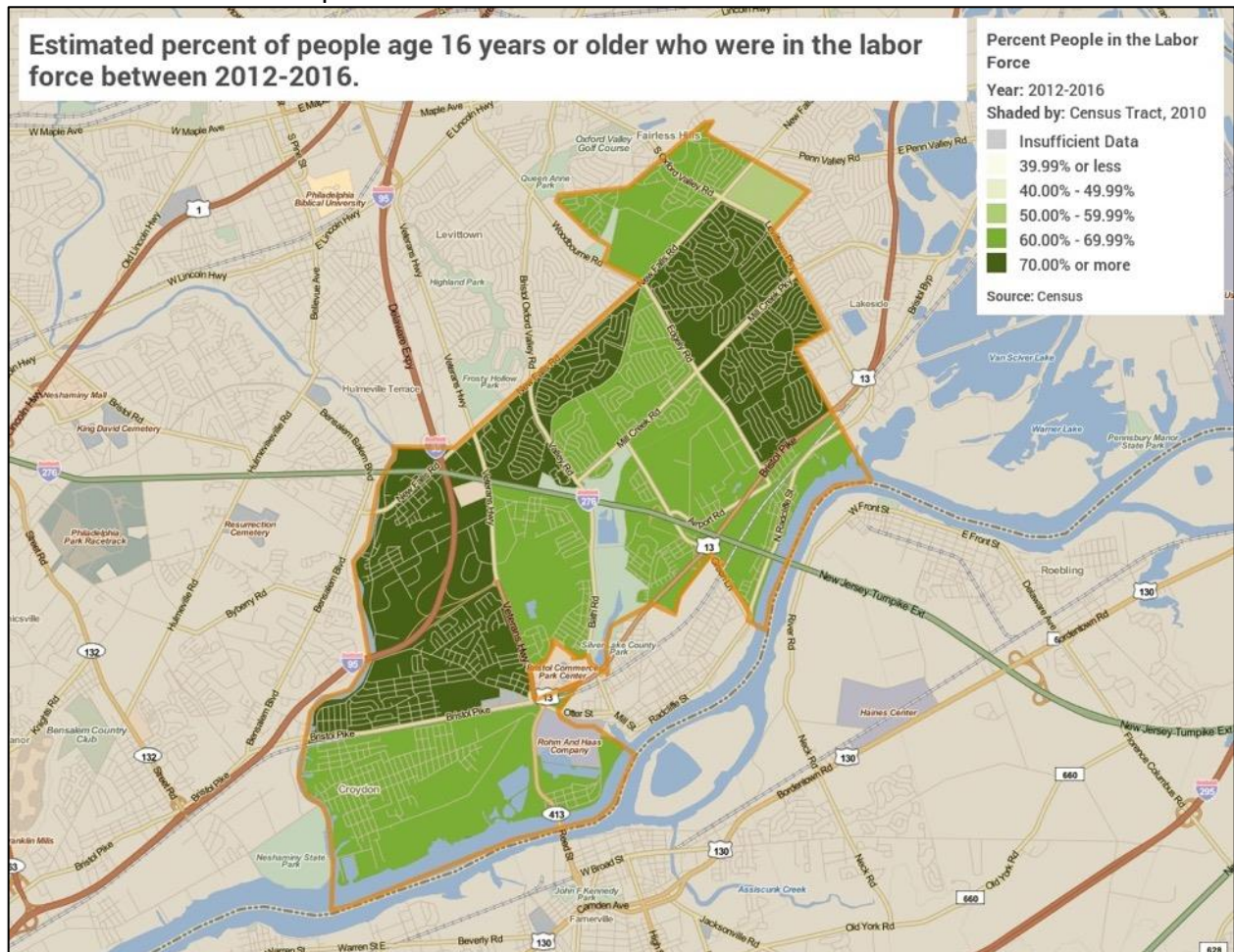
MAP: Unemployment Rate



Source: 2012-2016 ACS via PolicyMap

The map below displays the geographical distribution of the labor force in Bristol Township. The lightest shade represents areas where the percentage of the population participating in the labor force is less. The percent participating in the labor force increases as the shade darkens. The concentration of the Bristol Township's labor force is spread out across the township, however there is a slightly lower concentration in the southern, central, and northern tracts.

MAP: Labor Force Participation Rates

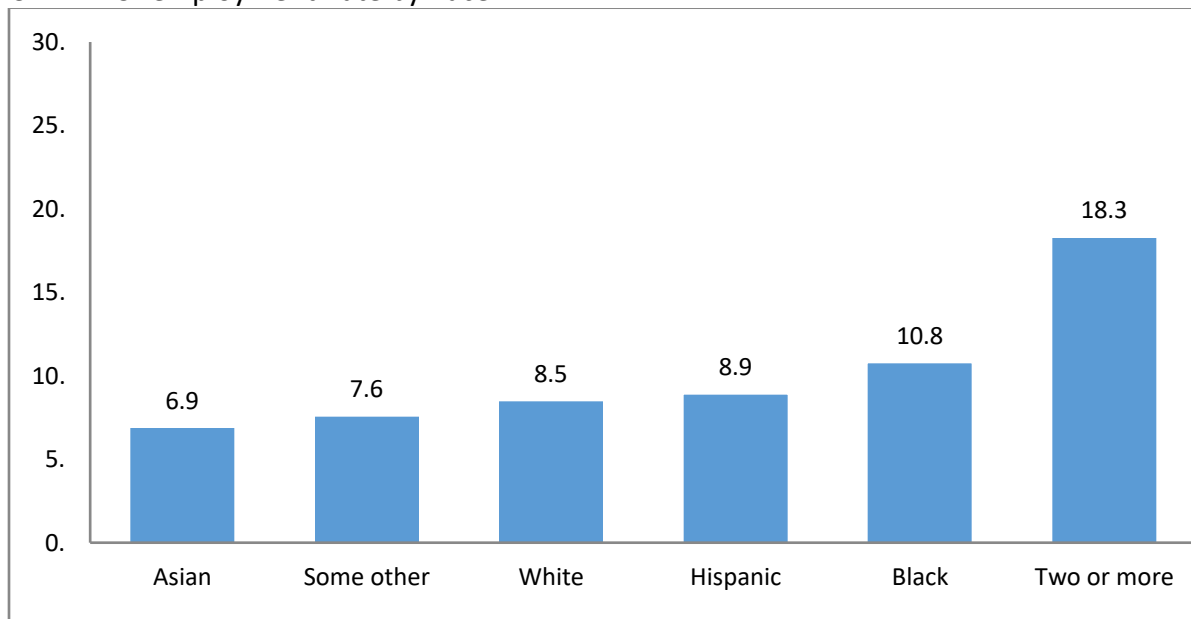


Source: 2012-2016 ACS via PolicyMap

Unemployment and Race

Bristol Township's unemployment rate was 8.7% in 2016, but the rate varied widely by race. Hispanic, Black, and residents who identify as two or more races had higher than average unemployment. White, Asian, and residents who identify as some other race had lower than average unemployment rates. The chart below displays a comparison for unemployment rates for each race group.

CHART: Unemployment Rate by Race



Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S2301)

Data Note: There was insufficient unemployment data for American Indian and Alaskan Natives and Native Hawaiian and Other Pacific Islanders.

Jobs by Industry

The table below outlines the labor statistics in Bristol Township by industry. The largest industry is Education and Health Care Services at 19.8 percent. The second largest job-producing industry is Retail trade with 15.6 percent, followed by Manufacturing at 13.4 percent. Many industries are within 1-2 percent of the state representation, though some key industries do stand out. It should be noted that according to the Bureau of Labor Statistics, the fastest growing sector in the United States is the Health Care and Social Assistance while Manufacturing is one of the most rapidly declining sectors in the US.

TABLE: Business by Sector				
Industry	Number of Workers	Share of Workers (%)	Number of Workers	Share of Workers (%)
	Bristol Township		Pennsylvania	
Agriculture, forestry, fishing and hunting, mining	72	0.3%	87,736	1.5%
Construction	2,227	8.0%	343,108	5.7%
Manufacturing	3,726	13.4%	727,257	12.0%
Wholesale trade	924	3.3%	168,855	2.8%
Retail trade	4,335	15.6%	704,684	11.7%
Transportation and warehousing, and utilities	1,782	6.4%	314,651	5.2%
Information	413	1.5%	102,782	1.7%
Finance and insurance, real estate, rental, leasing	1,614	5.8%	388,456	6.4%
Professional, scientific, management, administrative and waste management services	2,536	9.1%	603,492	10.0%
Educational services, health care, social assistance	5,494	19.8%	1,564,018	25.9%
Arts, entertainment, recreation, accommodation and food services	2,186	7.9%	512,816	8.5%
Other services, except public administration	1,420	5.1%	280,616	4.6%
Public administration	998	3.6%	245,222	4.1%
Total	27,727	-	6,043,693	-
Source: 2012-2016 American Community Survey 5-Year Estimates (DP03)				

Transportation

According to 2012-2016 American Community Survey figures, driving a vehicle alone is by far the most popular form of transportation in Bristol Township with 83.5 percent of the labor force using their personal vehicles for their work commute. A distant second is carpooling (10.3%), followed by public transportation (3.1%) and working from home (1.5%). Statewide commuters as a whole walk at a rate of five times more than commuters in Bristol Township. The state also has significantly higher rates of public transportation use and working from home.

TABLE: Commuting to Work (Method)		
	Bristol Township (%)	Pennsylvania (%)
Workers 16 years and over	27,431	5,922,289
Car, truck, or van	93.80%	85.00%
Drove alone	83.50%	76.50%
Carpooled	10.30%	8.50%
Public transportation (excluding taxicab)	3.10%	5.60%
Walked	0.70%	3.80%
Bicycle	0.40%	0.50%
Taxicab, motorcycle, or other means	0.60%	0.90%
Worked at home	1.50%	4.20%
Source: 2012-2016 American Community Survey 5-Yr Estimates (S0801)		

Public transportation throughout Bristol Township is relatively limited. SEPTA provides service in the area, as well as the rest of Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties. Bus Route 129 runs through the western part of the Township but is not conducive to travel within the Township. There is also a regional rail line that stops in Bristol Township.

MAP: SEPTA Bus Route 129

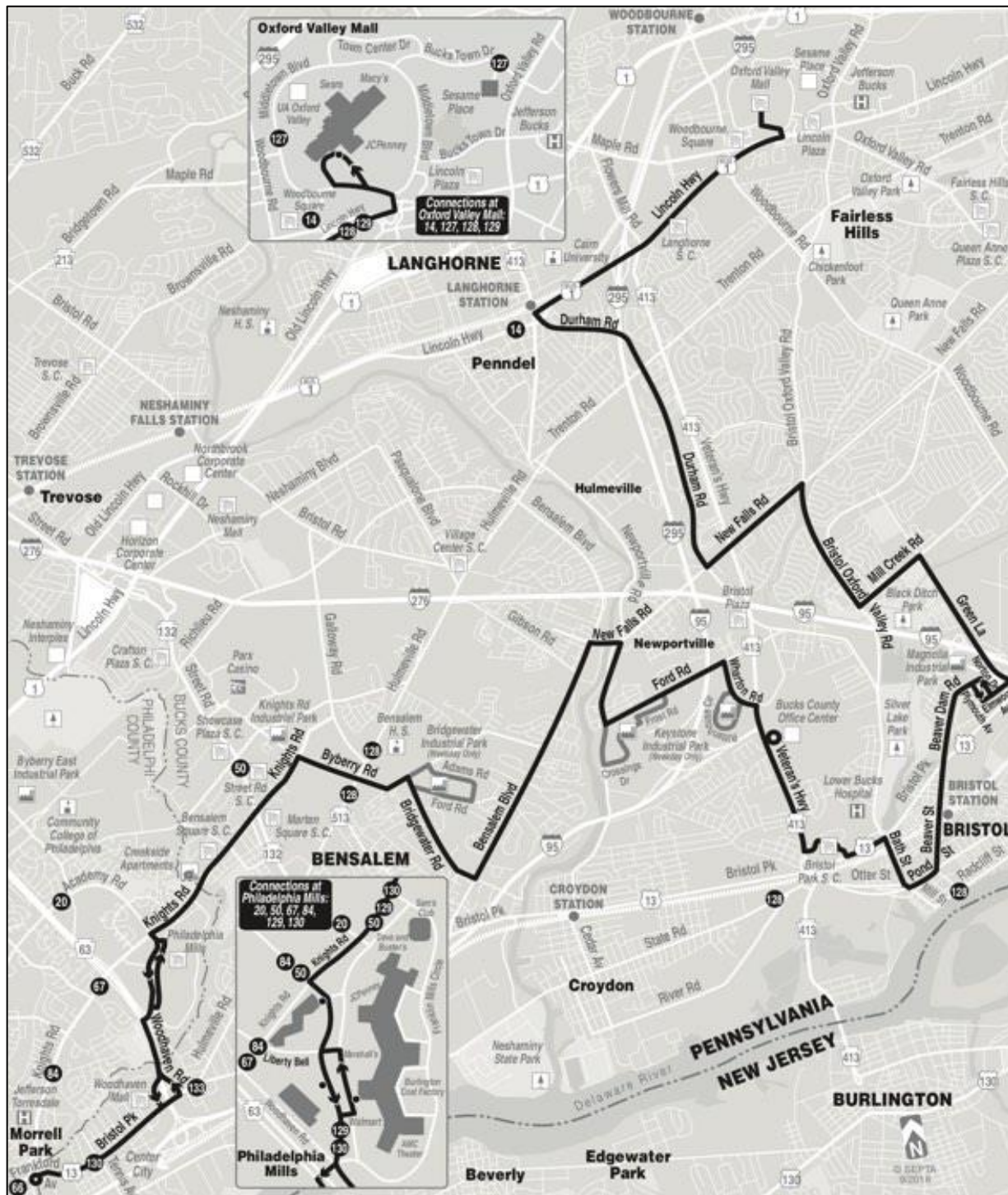


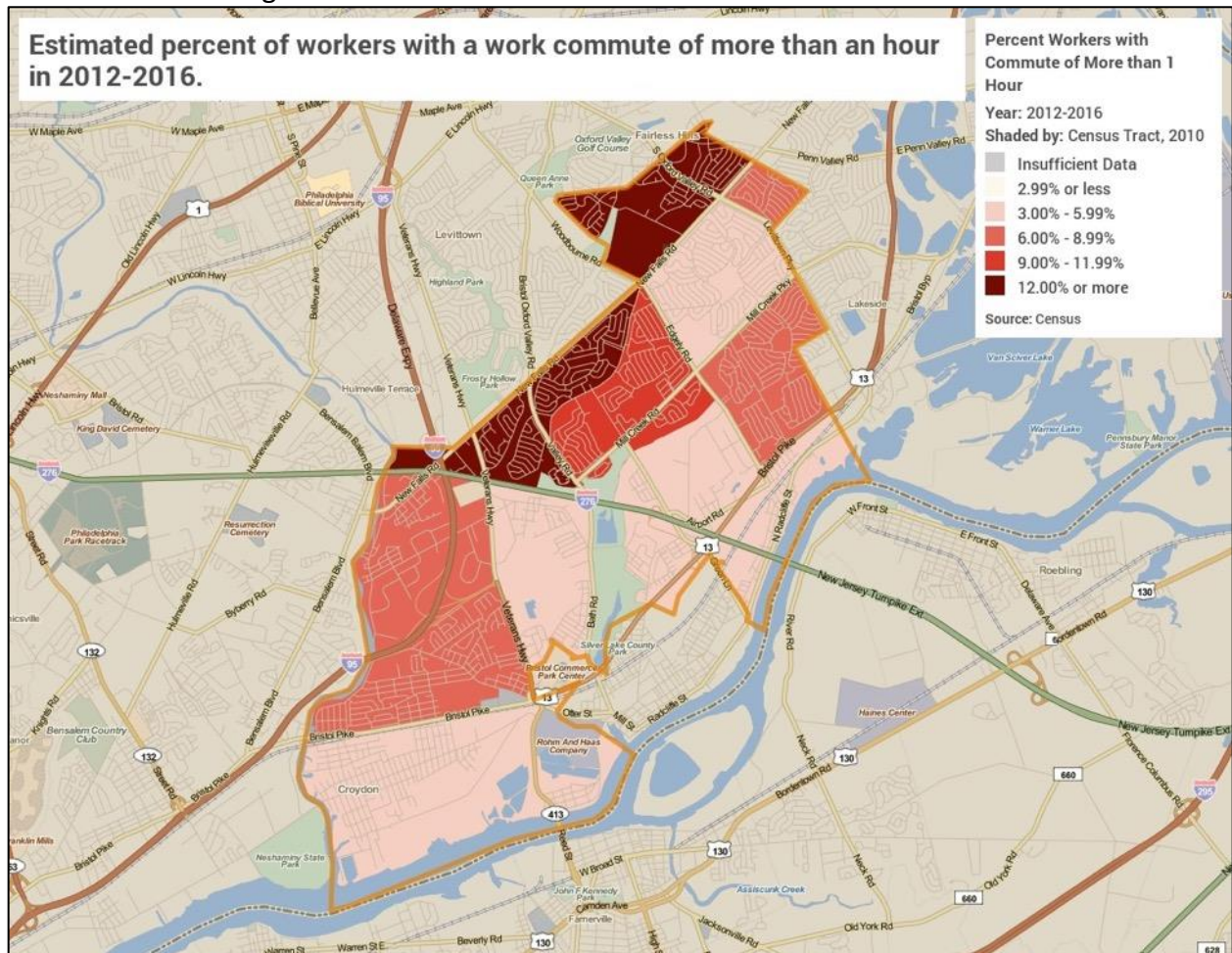
TABLE: Travel Time to Work

Bristol Township	2000	2016	Percent Change
Workers 16 years and over who did not work at home	26,798	27,010	0.8%
Less than 10 minutes	14.4%	8.0%	-44.4%
10 to 19 minutes	33.9%	35.4%	4.4%
20 to 29 minutes	19.8%	25.2%	27.3%
30 to 59 minutes	24.2%	23.4%	-3.3%
60 or more minutes	7.7%	8.0%	3.9%
Mean travel time to work (minutes)	25.0	25.3	1.2%
Source: Census 2000, 2012-2016 American Community Survey 5-Yr Estimates (S0801)			

Travel time to work in Bristol Township has increased slightly. In 2000, 51.7 percent of workers commuted over 20 minutes. In 2016, that figure rose to 56.6 percent. The most dramatic change is percentage of people who commute less than 10 minutes. That time group shrank from 14.4 percent to 8 percent, a drop of nearly 50 percent.

The following series of maps shows travel data in Bristol Township. The first map shows the percentage of the population who commutes more than one hour to work. The lightest shade means that less than 3 percent of the population must commute one hour or more. The darkest shade represents areas where 12 percent or more of the population commutes one hour or more.

MAP: Commute Longer Than One Hour

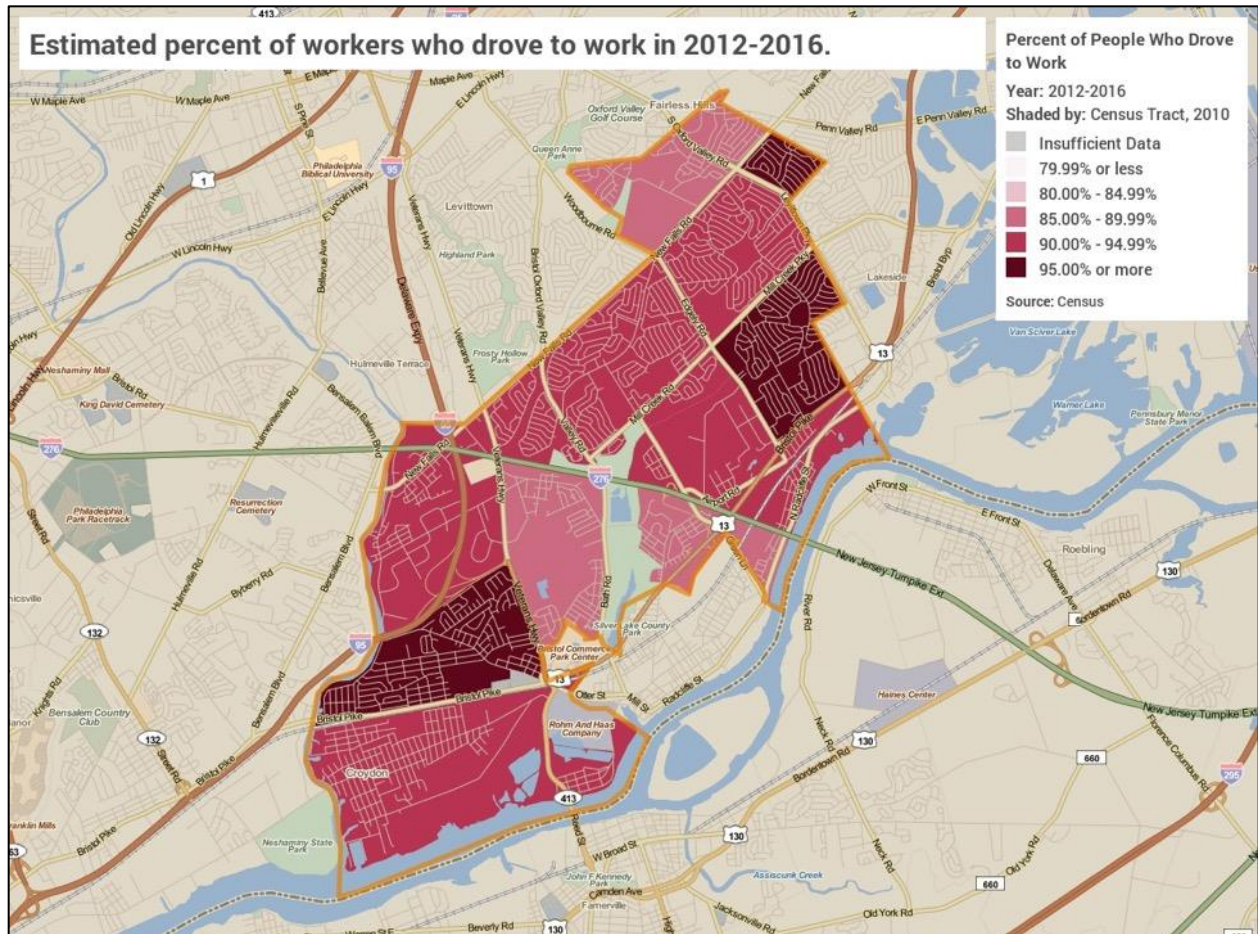


Source: 2012-2016 ACS via PolicyMap

In the northern areas workers in Bristol Township took the most time to travel to work. It suggests workers in this area do not work where they reside. This also creates congestion for those traveling into the township for work.

According to the 2012-2016 ACS, 83.5 percent of the labor force in Bristol Township drove alone using personal vehicles. This map shows the percent of the population that drives to work. Lighter shades indicate a lower concentration of people who drive alone to work; darker shades indicate a higher concentration.

MAP: Percent of Workers Who Drove to Work



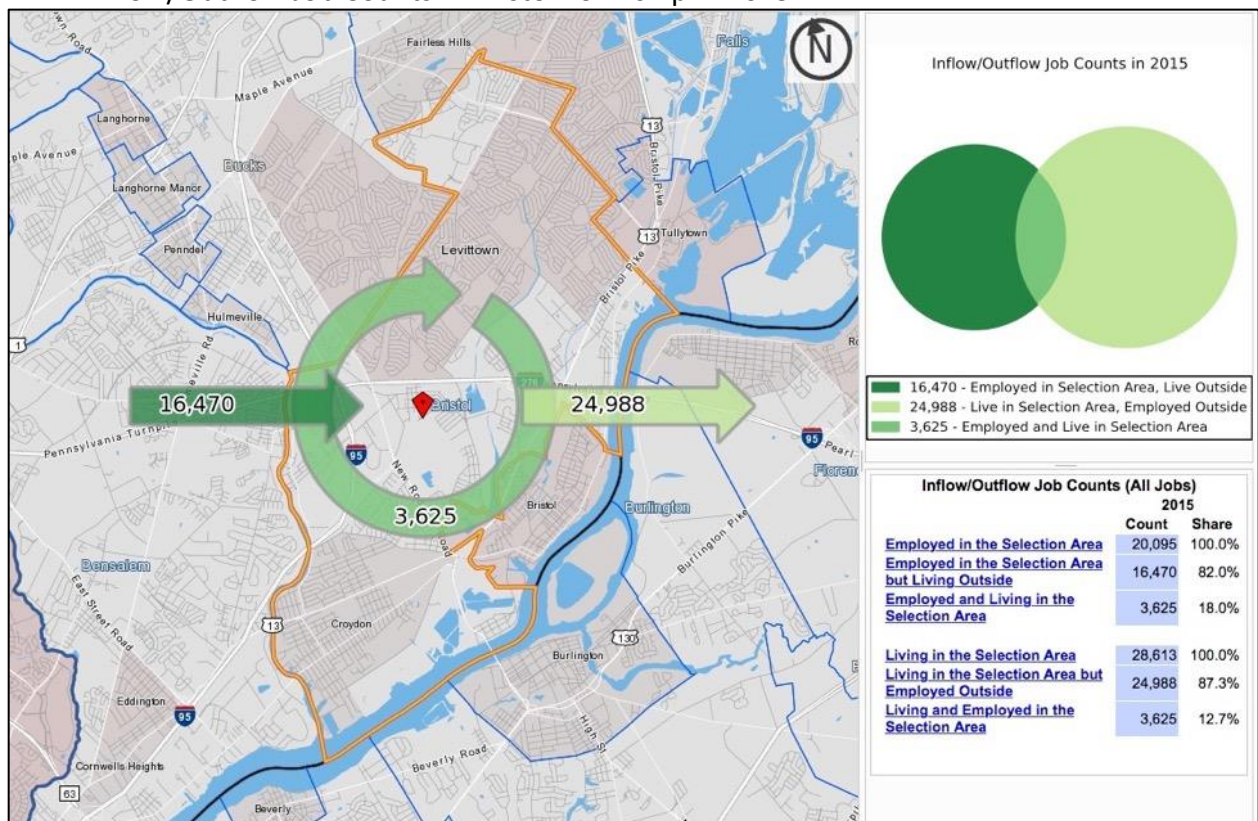
Source: 2012-2016 ACS via PolicyMap

Throughout the entire Township 80 percent or more of the population drove to work. Three census tracts (two to the east and one to the west) had rates of 95 percent or more. This is not surprising given the number of major roadways in and around Bristol Township.

In addition to analyzing Bristol Township residents who commute, it is important to capture residents who work in Bristol Township but do not live in the township. These individuals contribute significantly to traffic. There is an apparent disconnect between the availability of housing within the township. All things being equal, most residents would rather live closer to their places of employment than further away. Reduced commute times often contribute to increased health, happiness, and productivity of employees while reducing wear and tear on public roads.

The following map shows that 16,470 employees, or 82 percent of the workforce, live outside of Bristol Township. Additionally, nearly 25,000 Bristol Township residents leave the Township for work. This is an incredibly large disconnect between where people live and where they work. All things being equal, it is better for residents to work near their homes to reduce congestion, travel time, and increase tax revenue for the Township.

MAP: Inflow/Outflow Job Counts in Bristol Township in 2015



Source: Longitudinal Employer-Household Dynamics (LEHD) 2015

Veterans

As of the 2012-2016 ACS, there were 3,377 veterans living in Bristol Township – 7.9 percent of the population over 18 years old. Of those, 88.7 percent were White, and 95.3 percent were male. Bristol Township veterans have a median income significantly higher than non-veterans in the township. The township’s veterans are also less likely to have a bachelor’s degree or higher than non-veterans but have a higher median income, lower unemployment rate, and lower poverty rate. Veterans are almost twice as likely to have a disability than non-veterans.

TABLE: Veterans

Bristol Township	Veterans	Non-veterans
Civilian population over 18 years old	3,377	39,159
Median Income	\$34,984	\$30,379
Labor force participation rate	78.4%	80.5%
Unemployment rate	5.4%	8.3%
Below poverty in the past 12 months	7.4%	8.3%
With any disability	28.2%	15.2%
Source: 2012-2016 American Community Survey 5-Year Estimates (S2101) Data Note: Median Income in the past 12 months		

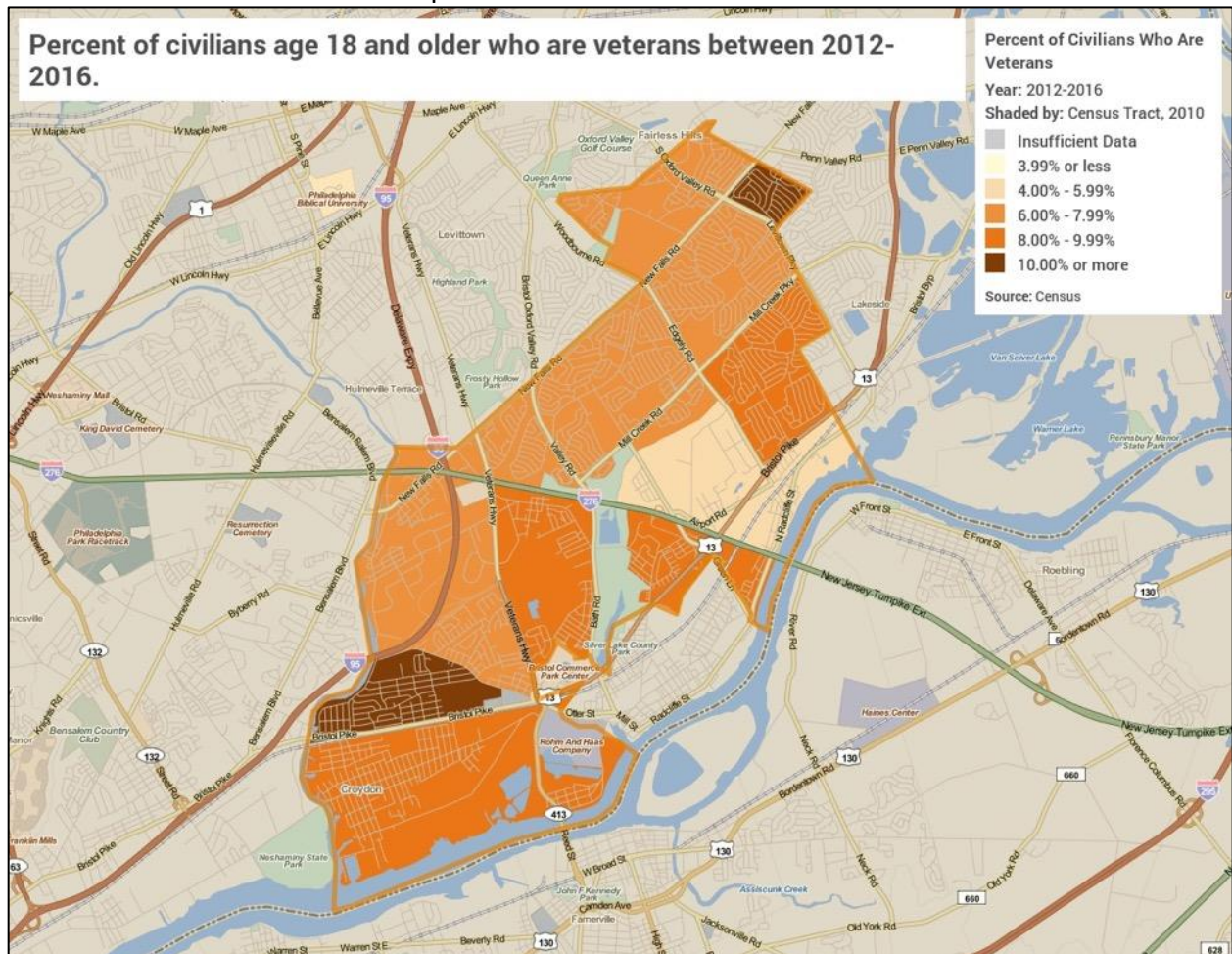
The table below compares Bristol Township’s veterans to the state as a whole.

TABLE: Veterans – State Comparison

Veterans	Bristol Township	Pennsylvania (state)
Civilian population over 18 years old	3,377	840,258
Median Income	\$34,984	\$34,835
Labor force participation rate	78.4%	75.6%
Unemployment rate	5.4%	6.3%
Below poverty in the past 12 months	7.4%	6.5%
With any disability	28.2%	27.8%
Source: 2012-2016 American Community Survey 5-Year Estimates (S2101)		

Statistics for veterans in Bristol Township are similar to those in the state. MHI, labor force participation, poverty rate, and population with a disability are all slightly higher while unemployment is slightly lower.

MAP: Veterans in Bristol Township



Source: 2012-2016 ACS via PolicyMap

While 7.9 percent of the population 18 years and older in Bristol Township are veterans, the concentration number of veterans varied throughout the township. Two census tracts, one on the northeast and one on the southern west part of the township, had a higher rate of veterans, over 10 percent.

Housing Profile

Housing Type & Size

According to the 2012-2016 American Community Survey estimates, 1-unit detached structures were the most prevalent type of housing in Bristol Township, comprising 76.3 percent of the housing stock (16,109 units). The second most prevalent unit type in the township was large complexes with 20 or more units at 7.2 percent of the housing stock (1,530 units). Since the 2000 Census, there has been very little change in Bristol Township in the type of housing units. The proportion of the housing stock made up of 1-unit, detached and attached, 2-unit, 5-9 unit, 10-19 units, and mobile home structures are all within 1 percent of what they were in 2000. The only two with a noticeable change is 3- or 4-unit structures growing from 1.6 percent to 3.8 percent and 20 or more-unit structures shrinking from 9.5% to 7.2 percent.

HUD defines a multifamily structure as a structure with more than four housing units; therefore, a single-family structure is not just a structure with one unit, but also structures of up to four housing units. Given HUD's definitions of single-family housing, the data shows that the most prevalent housing type in Bristol Township was overwhelmingly single-family, with 85.2 percent of all housing units located in structures of one to four units.

TABLE: Residential Properties by Type & Number of Units				
Property Type	2000		2016	
	Number	%	Number	%
1-unit, detached structure	15,740	76.8%	16,109	76.3%
1-unit, attached structure	684	3.3%	812	3.8%
2 units	211	1%	264	1.3%
3 or 4 units	330	1.6%	808	3.8%
5-9 units	303	1.5%	475	2.3%
10-19 units	1,142	5.6%	1,053	5.0%
20 or more units	1,939	9.5%	1,530	7.2%
Mobile Home	128	0.6%	69	0.3%
Boat, RV, van, etc.	9	0.1%	5	0.0%
Total	20,486	100%	21,125	100%
Data Source: 2000 Census H030, 2012-2016 American Community Survey 5-Year Estimates (B25024)				

Housing Unit Size

According to the 2012-2016 ACS, three-bedroom units make up the largest portion of Bristol Township's housing stock at 42.8 percent of all units. The second most prevalent housing size were 4-bedroom units at 25.6 percent of the township's housing stock. At 15.9 percent of the housing stock, 2-bedroom unit's account for the third largest housing size in Bristol Township.

The table below compares unit sizes from 2000 to 2016. The bedroom count in housing units is increasing throughout the township. The proportion of homes with no bedrooms, 1-bedroom, and 2-bedrooms has decreased while the proportion of homes with 3-bedrooms and 4-bedrooms has increased. The proportion with 5 or more bedrooms has decreased slightly from 3.3 percent to 3.2 percent.

TABLE: Housing Units by Size				
	2000		2016	
Bedroom Count	Number	%	Number	%
No bedroom	313	1.5%	450	2.1%
1 bedroom	2,575	12.6%	2,191	10.4%
2 bedrooms	3,741	18.3%	3,357	15.9%
3 bedrooms	7,971	38.9%	9,048	42.8%
4 bedrooms	5,219	25.4%	5,402	25.6%
5 or more bedrooms	667	3.3%	677	3.2%
Total	20,486	100%	21125	100%
Data Source: 2000 Census H041, 2012-2016 American Community Survey 5-Year Estimates (B25041)				

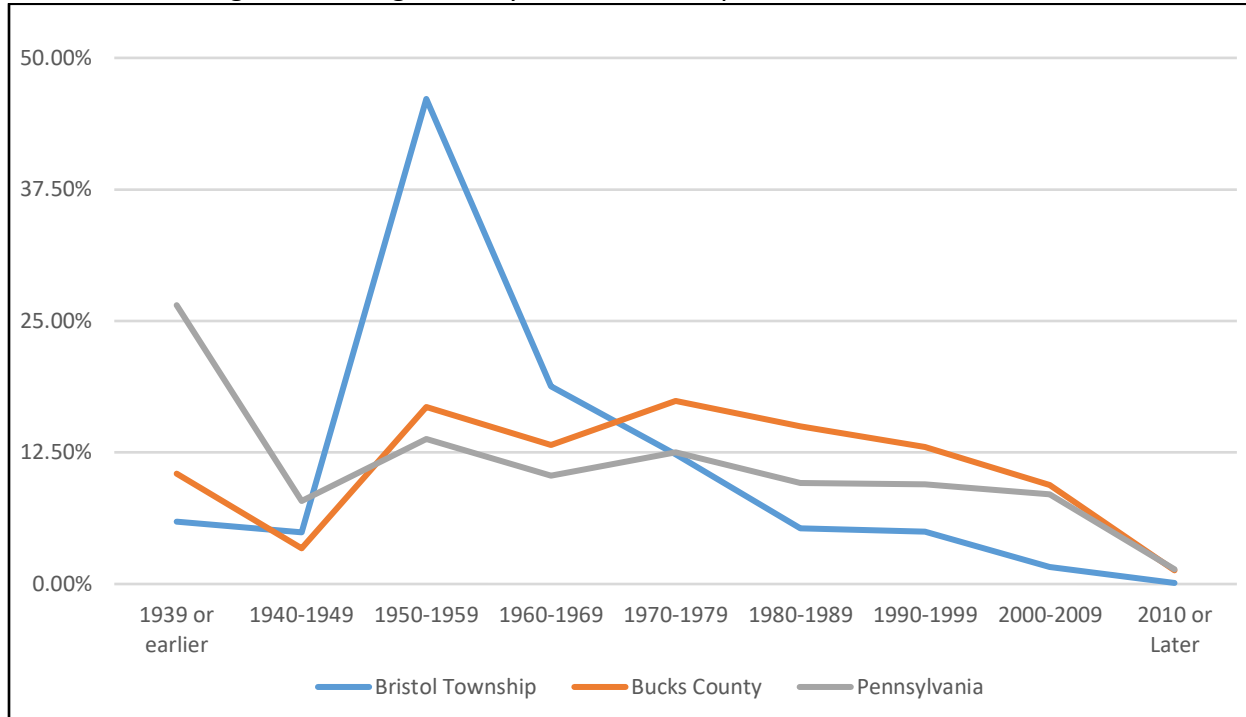
Housing Conditions

The table below provides data on the age of Bristol Township’s housing stock by year cohort in comparison to Bucks County and the state of Pennsylvania. The largest cohort in the township was units built between 1950 and 1959, comprising 46.1 percent of the housing stock (9,749 units). Housing in Bucks County is much more widely distributed by year built, six different year cohorts had between 10 percent and 18 percent of homes built during them. The state of Pennsylvania as a whole generally has older homes – the largest cohort was built before 1940, with 26.5 percent of homes in that range.

TABLE: Year Unit Built						
	Bristol Township		Bucks County		Pennsylvania	
Range	Number	%	Number	%	Number	%
Built 2010 or Later	18	0.1%	3118	1.3%	76801	1.4%
Built 2000 to 2009	346	1.6%	23,099	9.4%	472,875	8.5%
Built 1990 to 1999	1,050	5.0%	32,170	13.0%	532,992	9.5%
Built 1980 to 1989	1,121	5.3%	36,980	15.0%	538,548	9.6%
Built 1970 to 1979	2,593	12.3%	43,020	17.4%	699,728	12.5%
Built 1960 to 1969	3,972	18.8%	32,691	13.2%	574,892	10.3%
Built 1950 to 1959	9,749	46.1%	41,518	16.8%	771,854	13.8%
Built 1940 to 1949	1,037	4.9%	8,276	3.4%	440,744	7.9%
Built 1939 or earlier	1,239	5.9%	25,997	10.5%	1,483,741	26.5%
Total	21,125	100%	246,869	100%	5,592,175	100%
Data Source: 2012-2016 American Community Survey 5-Year Estimates (B25034)						

The chart below displays the data from the above table. The housing stock in Bristol Township grew considerably in the 1950's but production slowed after that. Bucks County and the state saw considerably more stable housing growth since 1940.

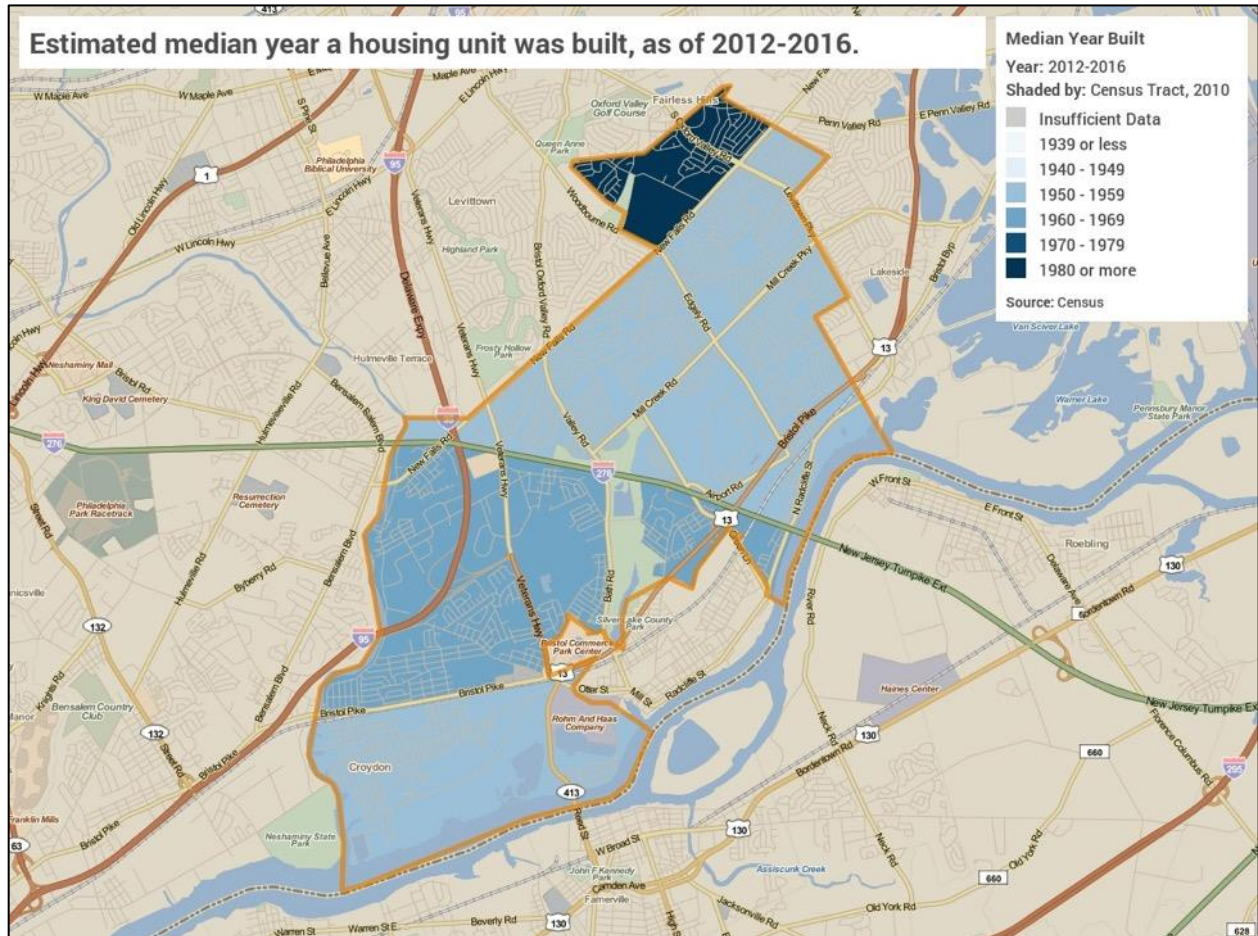
CHART: Percentage of Housing Stock by Year Built Comparison



Data Source: 2012-2016 American Community Survey 5-Year Estimates (B25034)

The following map shows the median year built for housing units by census tract in Bristol Township. Only one area had a median year built of 1970 or later. As noted in the table above, there are fewer homes in Bristol Township with housing newer than 1959.

MAP: Median Year Built



Source: 2012-2016 ACS via PolicyMap

Housing Occupancy Characteristics

The table below compares renter and owner occupancy data across Bristol Township between 2000 and 2016. Since the 2000 Census, the percentage of occupied housing units has decreased in Bristol Township. The total number of housing units increased by almost 700 units, but the number of occupied units decreased by approximately 300 units. The percentage of owner-occupied housing units decreased slightly from 76.3 percent to 72.4 percent.

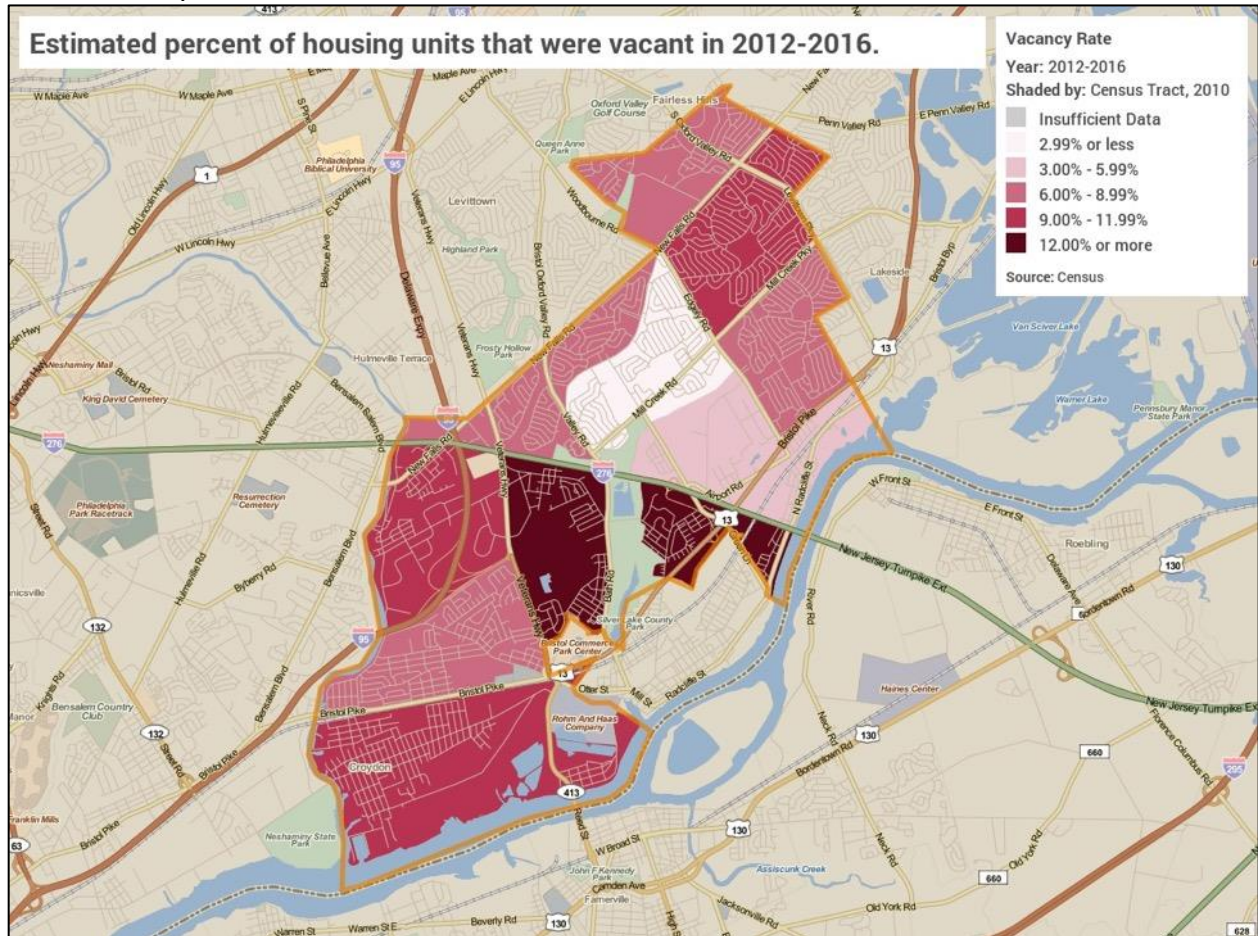
TABLE: Housing Occupancy				
	2000		2016	
	Number	%	Number	%
Total Housing Units	20,486	100%	21,125	100%
Occupied Housing Units	19,733	96.3%	19,440	92.0%
Owner Occupied Housing Units	15,061	76.3%	14,066	72.4%
Renter Occupied Housing Units	4,672	23.7%	5,374	27.6%
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The following table shows the vacancy rates for renters and homeowners in both Bristol Township and Pennsylvania. A property is considered vacant if no one is living in it at the time of enumeration and it is available for occupation (for example, it does not contain any structure that is damaged to a point where it would be deemed unfit for occupation). From 2000 to 2016, both rental and homeowner vacancy rates increased in Bristol Township. The state saw a very slight increase in homeowner vacancy but a noticeable decrease in renter vacancy during that time.

TABLE: Vacancy Rate				
	2000		2016	
	Homeowner Vacancy Rate	Rental Vacancy Rate	Homeowner Vacancy Rate	Rental Vacancy Rate
Bristol Township	0.8%	5.0%	1.3%	8.6%
Pennsylvania (state)	1.6%	7.2%	1.7%	5.8%
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The map below depicts the residential vacancy rates by census tract in Bristol Township. The lightest shade signifies a vacancy rate under 3 percent, and the rate increases as the shade darkens. The central area of the township has the largest vacancy rate, 12 percent or more.

MAP: Vacancy

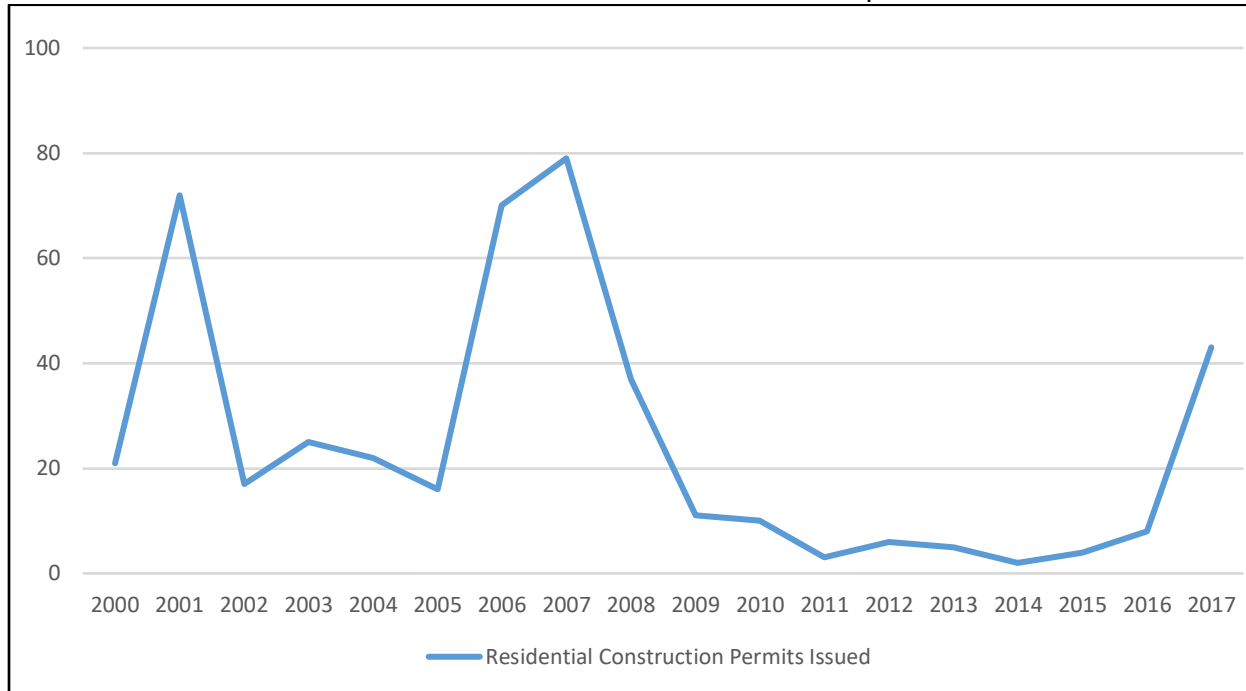


Source: 2012-2016 ACS via PolicyMap

Construction Activity

Residential construction has varied considerably since 2000. In 2001, there was a spike in units due to multi-unit developments but then permits issued decreased until 2006 when construction began again. By 2008, Bristol Township saw a decrease in permits and issued relatively few until 2017.

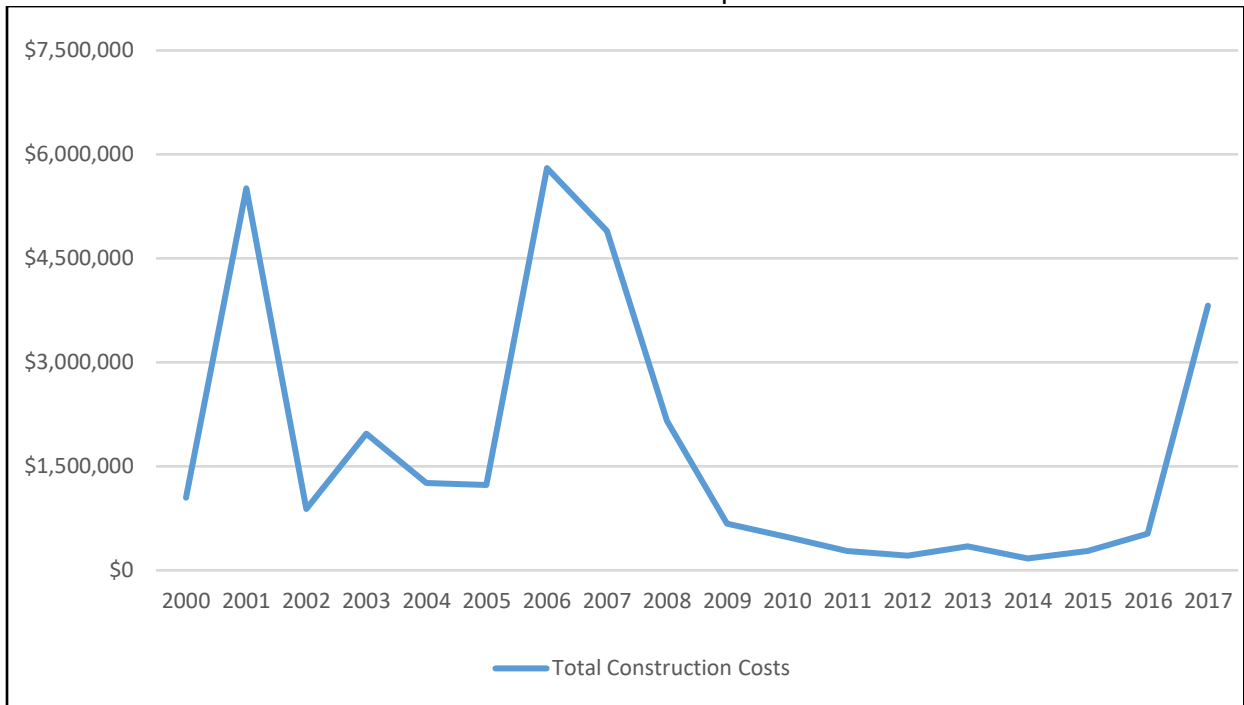
CHART: Residential Construction Permits Issued in Bristol Township



Source: US Census Bureau

This second graph details the construction cost in Bristol Township. It heavily mirrors the number of construction permits issued in these years.

CHART: Total New Construction Cost in Bristol Township



Source: US Census Bureau

Housing Market and Demand

TABLE: Annual Housing Sales & Median Sales Price in Bristol Township

Census Tract		2010	2011	2012	2013	2014	2015	2016	2017	% Change 2010-2017
42017100302	Number	38	34	36	49	47	47	64	70	84.2%
	Median \$	\$160,000	\$129,000	\$147,450	\$130,000	\$115,000	\$145,000	\$151,650	\$161,200	0.8%
42017100303	Number	28	36	31	39	43	57	48	57	103.6%
	Median \$	\$155,528	\$161,250	\$127,500	\$139,500	\$115,000	\$142,000	\$157,750	\$174,000	11.9%
42017100304	Number	14	7	11	17	22	22	16	17	21.4%
	Median \$	\$132,520	\$188,000	\$159,900	\$155,000	\$130,000	\$154,625	\$156,000	\$225,000	69.8%
42017100306	Number	28	31	25	25	27	31	35	57	103.6%
	Median \$	\$165,950	\$170,000	\$154,000	\$130,000	\$142,000	\$149,900	\$157,400	\$153,175	-7.7%
42017100307	Number	26	29	39	28	38	49	65	70	169.2%
	Median \$	\$168,000	\$138,060	\$135,000	\$144,500	\$117,500	\$148,000	\$160,000	\$176,500	5.1%
42017100401	Number	67	73	78	85	97	106	107	106	58.2%
	Median \$	\$161,500	\$159,960	\$130,450	\$165,000	\$162,500	\$153,750	\$176,500	\$194,950	20.7%
42017100402	Number	51	48	65	91	113	103	114	107	109.8%
	Median \$	\$180,000	\$150,000	\$149,000	\$150,000	\$145,000	\$159,900	\$177,500	\$179,900	-0.1%
42017100403	Number	25	14	19	15	20	22	51	29	16.0%
	Median \$	\$100,000	\$112,684	\$125,000	\$87,100	\$60,000	\$152,250	\$135,000	\$125,000	25.0%
42017100404	Number	60	58	74	73	86	90	127	79	31.7%
	Median \$	\$179,750	\$152,450	\$154,100	\$152,712	\$154,000	\$155,500	\$174,900	\$185,000	2.9%
42017100406	Number	27	24	24	32	34	46	51	43	59.3%
	Median \$	\$242,000	\$224,000	\$235,000	\$236,500	\$244,750	\$233,450	\$245,000	\$275,000	13.6%
42017100407	Number	14	14	14	22	21	23	21	23	64.3%
	Median \$	\$161,250	\$143,750	\$178,450	\$141,000	\$163,157	\$150,000	\$197,000	\$190,000	17.8%
42017100408	Number	73	59	73	92	103	101	138	129	76.7%
	Median \$	\$170,000	\$155,000	\$139,900	\$160,000	\$149,000	\$159,900	\$167,500	\$205,000	20.6%
Total		451	427	489	568	651	697	837	787	74.5%

Data Source: Boxwood Means Inc. via Policy Map

Since 2010, the annual number of homes sold in Bristol Township has steadily increased overall. In 2010, approximately 450 sales took place in the Township. By 2017 that number was up to nearly 800, a 74.5 percent increase. Median Sales Price was not available for the total number sold.

Housing Costs

The following section examines data on housing costs for owners and renters across Bristol Township. The data tables provide a comparison between the 2000 Census and the 2012-2016 American Community Survey 5 – Year Estimates.² Housing costs across Bristol Township increased significantly between 2000 and 2016. Median home values for owner-occupied homes increased by 90.4 percent and the median rent increased by 58.7 percent.

As detailed above, new unit production is still lower than it once was and thus the relatively fewer units coming to market each year have added to the upward pressure for both owner and renter options.

TABLE: Change in Cost of Housing			
	2000	2016	Percent Change 2000-2016
Median Home Value	\$107,700	\$205,100	90.4%
Median Gross Rent	\$607	\$963	58.7%
Data Source: Census 2000 (DP-4), 2012-2016 American Community Survey 5-Year Estimates (DP04)			

The following table compares 2000 and 2016 home value cohort data for the township. In Bristol Township the general trend over time is that lower price cohorts are accounting for smaller portions of the housing stock, while higher value cohorts are accounting for a larger share. The one exception to this is extremely low-cost homes (less than \$50,000); there has been growth in raw numbers as well as the percentage of the housing stock for this cohort.

² There are several instances where the way in which the data were collected and/or reported changed between the Census and ACS. In each case, a note is provided to clarify the data sets being presented.

TABLE: Median Home Value for Owner-Occupied Units

	2000		2016	
	Number	Percentage	Number	Percentage
Less than \$50,000	259	1.8%	456	3.2%
\$50,000 to \$99,999	5,119	35.2%	325	2.3%
\$100,000 to \$149,999	8,004	55.0%	1,418	10.1%
\$150,000 to \$199,999	988	6.8%	4,369	31.1%
\$200,000 to \$299,999	117	0.8%	6,480	46.1%
\$300,000 to \$499,999	43	0.3%	856	6.1%
\$500,000 to \$999,999	12	0.1%	110	0.8%
\$1,000,000 or more	5	0.0%	52	0.4%
Total Units/Median Value	14,547	\$107,700	14,066	\$205,100
Data Source: Census 2000 (DP-4), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The following line graph visualizes the shifts in median home value cohorts in Bristol Township from 2000 to 2016. The median home value has shifted considerably in this time period. In 2000 the largest price cohort was \$100,000-\$149,999 and in 2016 the largest cohort was \$200,000-\$299,999. The overall median home value increased by \$100,000, and the number of \$1 million homes increased ten-fold.

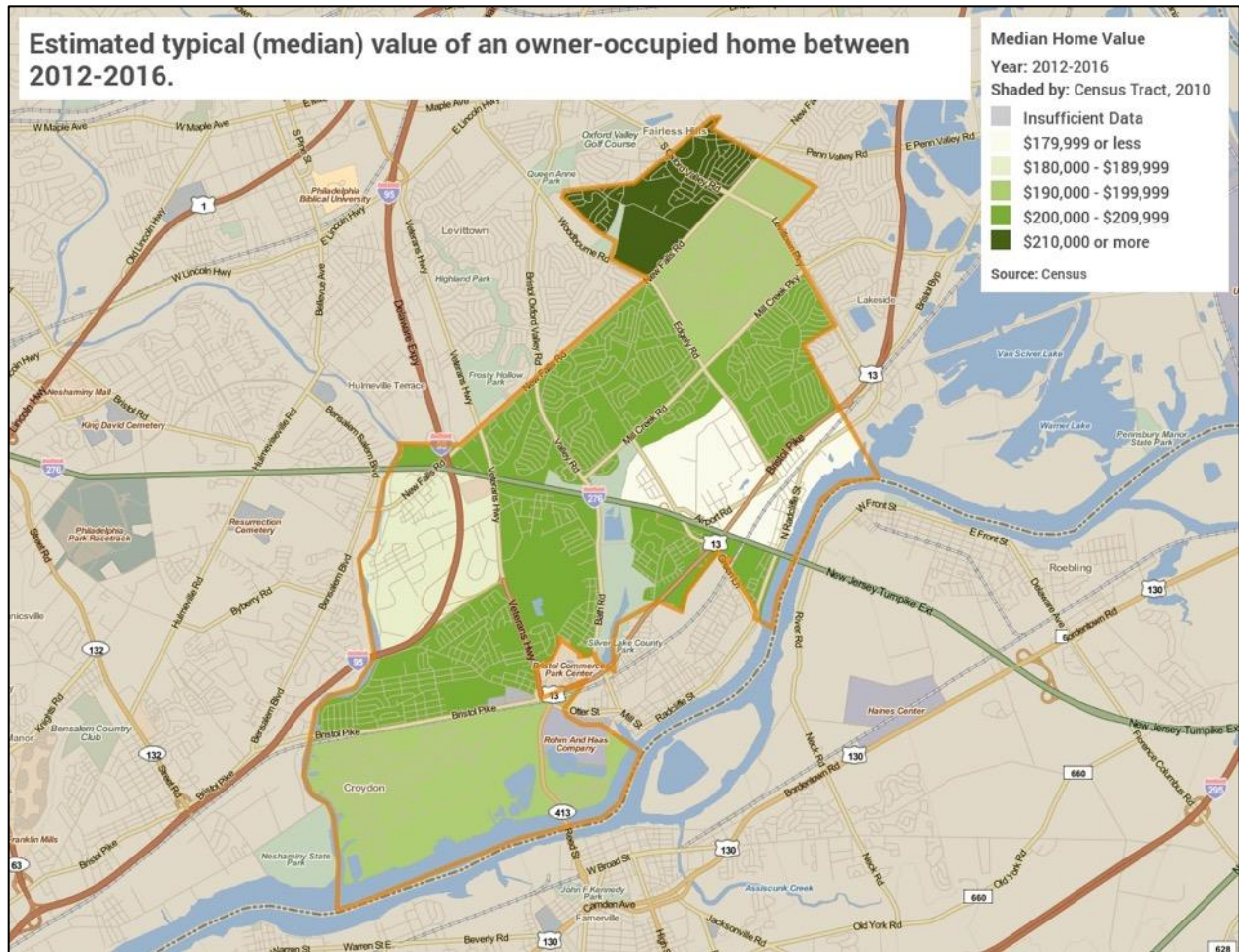
CHART: Median Home Value Per Price Cohort (%)



Source: Census 2000 (DP-4), 2012-2016 American Community Survey 5-Year Estimates (DP04)

The following map displays the median home value across Bristol Township. The lightest green shaded areas are where median home values were less than \$180,000, and the shade darkens as the home value increases. The highest value homes are concentrated in the north-northwestern portion of the township and the lowest value homes are in the central and eastern areas.

MAP: Median Home Value



Source: 2012-2016 ACS via PolicyMap

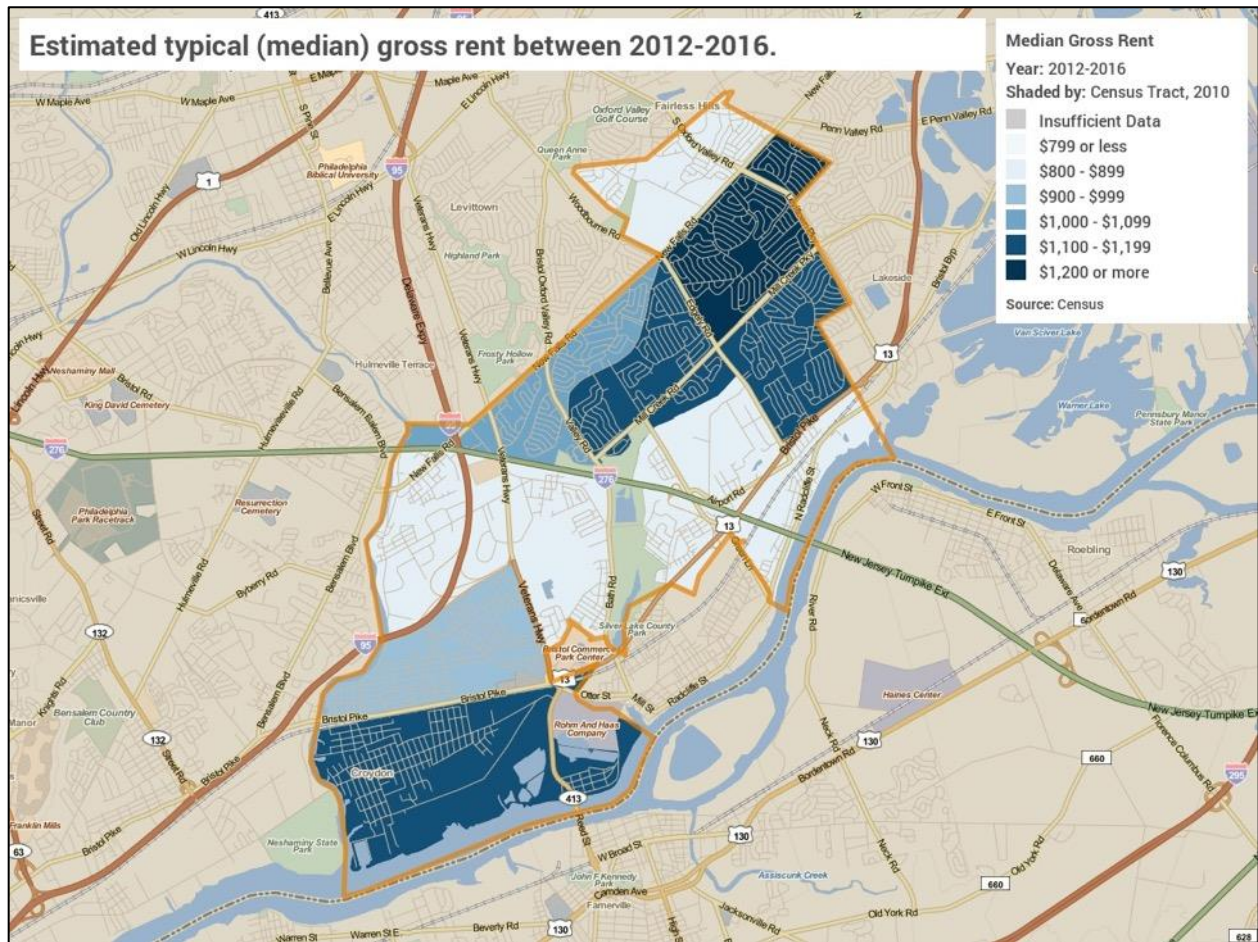
Median Rent

The table below compares 2000 and 2016 rent cohort data for Bristol Township. The general trend over time is that there are fewer units available in the lower rent cohorts and increasing numbers of units available in the higher rent cohorts. This is to be expected in light of the nearly 60 percent growth in rents since 2000. In 2000, over 90 percent of renters paid less than \$1,000 per month but by 2016 fewer than 60 percent were still in that range. The number of people paying \$1,500 or more increased from 7, representing 0.2 percent in 2000, to 613 in 2016. That high rent cohort now makes up over 12 percent of renters.

TABLE: Median Rent				
	2000		2016	
	Number	Percentage	Number	Percentage
No rent paid	142	N/A	362	N/A
Less than \$500	801	17.7%	390	7.8%
\$500-999	3,329	73.5%	2,436	48.6%
\$1,000-\$1,499	393	8.6%	1,573	31.4%
\$1,500 or more	7	0.2%	613	12.2%
Total Units/Median Rent	4,530	\$607	5,012	\$924
Data Source: Census 2000 (DP-4), 2012-2016 American Community Survey 5-Year Estimates (DP04)				
Note 1: Median Rent is calculated based solely on those renters actually paying rent.				
Note 2: Total Units is occupied units paying rent.				

The following map displays the distribution of median rent throughout Bristol Township. While the median rent in the township is \$924 there is some variety among census tracts. The lightest blue shaded areas represent where median rent was less than \$800, the shade darkens as the median rent increases. Median rents in the northeastern and far southern tracks were the highest, over \$1,000.

MAP: Median Rent



Source: 2012-2016 ACS via PolicyMap

Housing Affordability

By HUD's definition, households paying in excess of 30 percent of their monthly household income towards housing costs are said to be cost burdened. The tables below detail data on costs as percentage of household income for homeowners with a mortgage, homeowners without a mortgage, and renter costs as a percentage of income.

Nearly 40 percent of homeowners with a mortgage are cost-burdened in Bristol Township. Additionally, over 30 percent are paying more than 35 percent of their income to housing costs. Surprisingly, nearly one third of home owners with a mortgage pay less than 20 percent of their income to housing costs.

TABLE: Selected Monthly Costs of Home Owners with Mortgage		
	Number	Percentage
Less than 20%	3,009	31.3%
20 to 24.9%	1,601	16.7%
25 to 29.9%	1,181	12.3%
30 to 34.9%	840	8.7%
35% or more	2,979	31.0%
Total	9,610	--
Not Computed	12	N/A
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

Homeowners without a mortgage are significantly better off. Housing costs without a mortgage are relatively low. Nearly 25 percent of homeowners without a mortgage are cost burdened with 20.2 percent paying over 35 percent. Homeowners without a mortgage are more likely to be retired or approaching retirement, which means a fixed income that can be disproportionately harmed by increases in taxes and utilities. They are also likely to be elderly and have high medical costs. The homeowners who are cost burdened are in danger of facing housing problems as they get older.

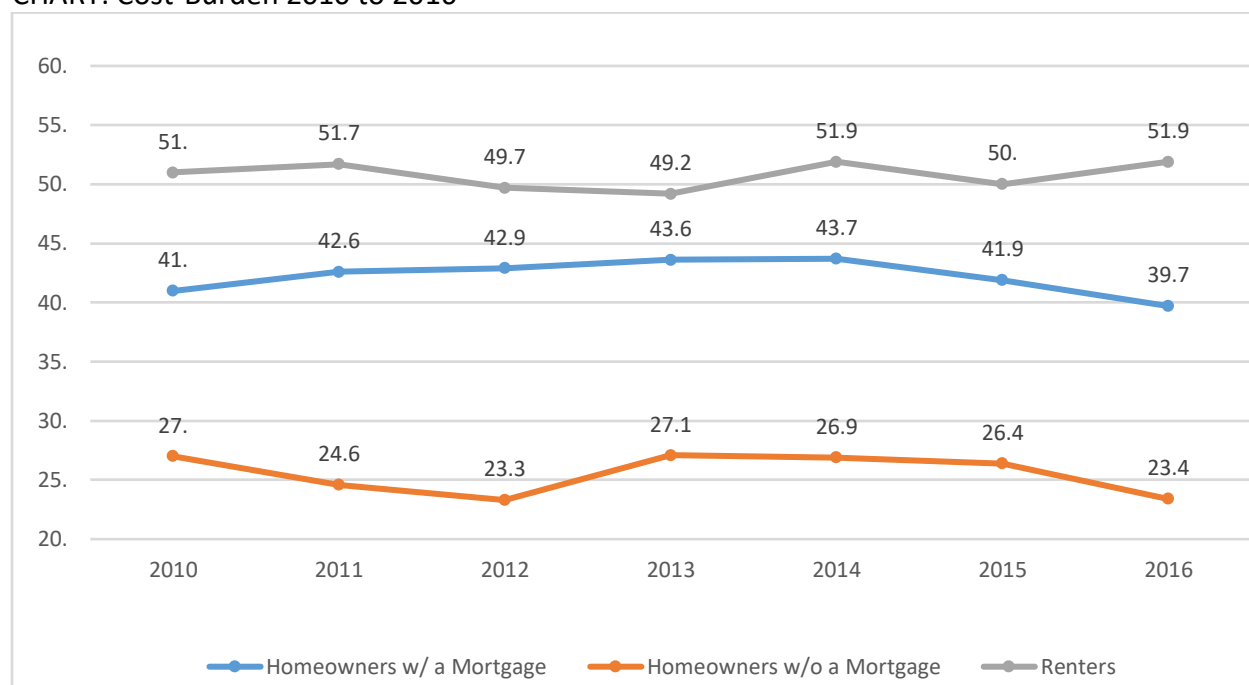
TABLE: Selected Monthly Costs of Home Owners without a Mortgage		
	Number	Percentage
Less than 10%	1,179	27.1%
10 to 14.9%	942	21.6%
15 to 19.9%	608	14.0%
20 to 24.9%	420	9.6%
25 to 29.9%	189	4.3%
30 to 34.9%	140	3.2%
35% or more	879	20.2%
Total	4,357	--
Not Commuted	35	N/A
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

Overall, renters face the highest levels of cost burden. Nearly 52 percent of renters are cost burdened and over 40 percent pay 35 percent or more. Unlike home owners, there are not many renters on the low end of the costs, only 7.5 percent pay less than 15 percent. Renters are disproportionately harmed by rising housing costs. They do not benefit from the increase in property value that home owners see.

TABLE: Selected Monthly Costs of Renters		
	Number	Percentage
Less than 15%	374	7.5%
15 to 19.9%	571	11.5%
20 to 24.9%	917	18.4%
25 to 29.9%	529	10.6%
30 to 34.9%	587	11.8%
35% or more	1,996	40.1%
Total	4,974	--
Not Commuted	400	N/A
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

The following chart shows the change in cost burdened households over time. Between 2010 and 2016 there was fairly little overall fluctuation in the rate of cost burden. Homeowners with a mortgage decreased slightly by 2016 but increased throughout the middle years. Homeowners without a mortgage saw the largest fluctuations hitting a low of 23.3 percent in 2012 and then the highest rate of 27.1 percent the next year. Renters increased slightly but fluctuated near 50 percent every year.

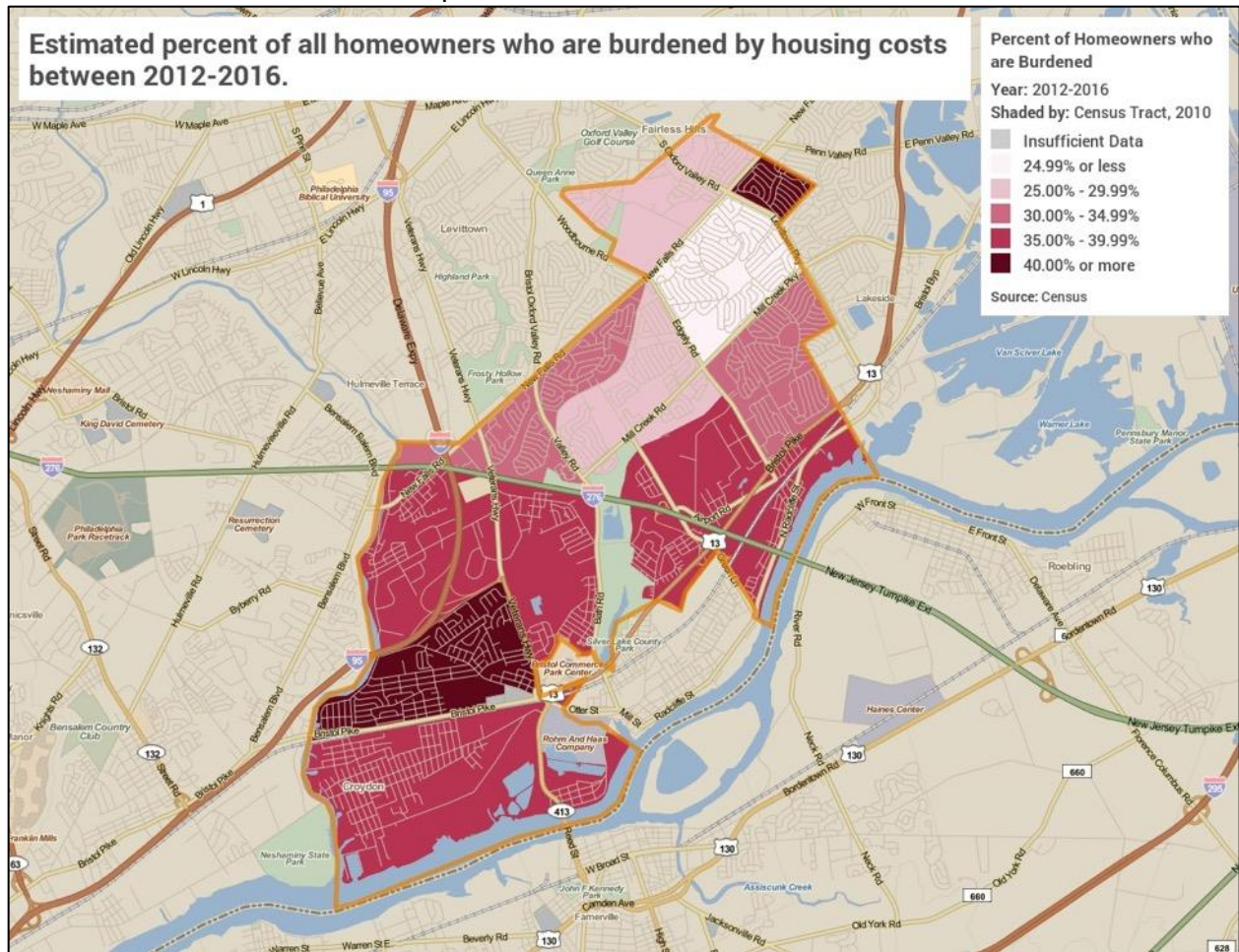
CHART: Cost-Burden 2010 to 2016



Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates (DP04)

The following four maps depict concentrations of cost burdened households. The first two show owner-occupied households (entire population and those 65 years or older) and the second pair of maps shows renter-occupied households (entire population and those 65 years or older).

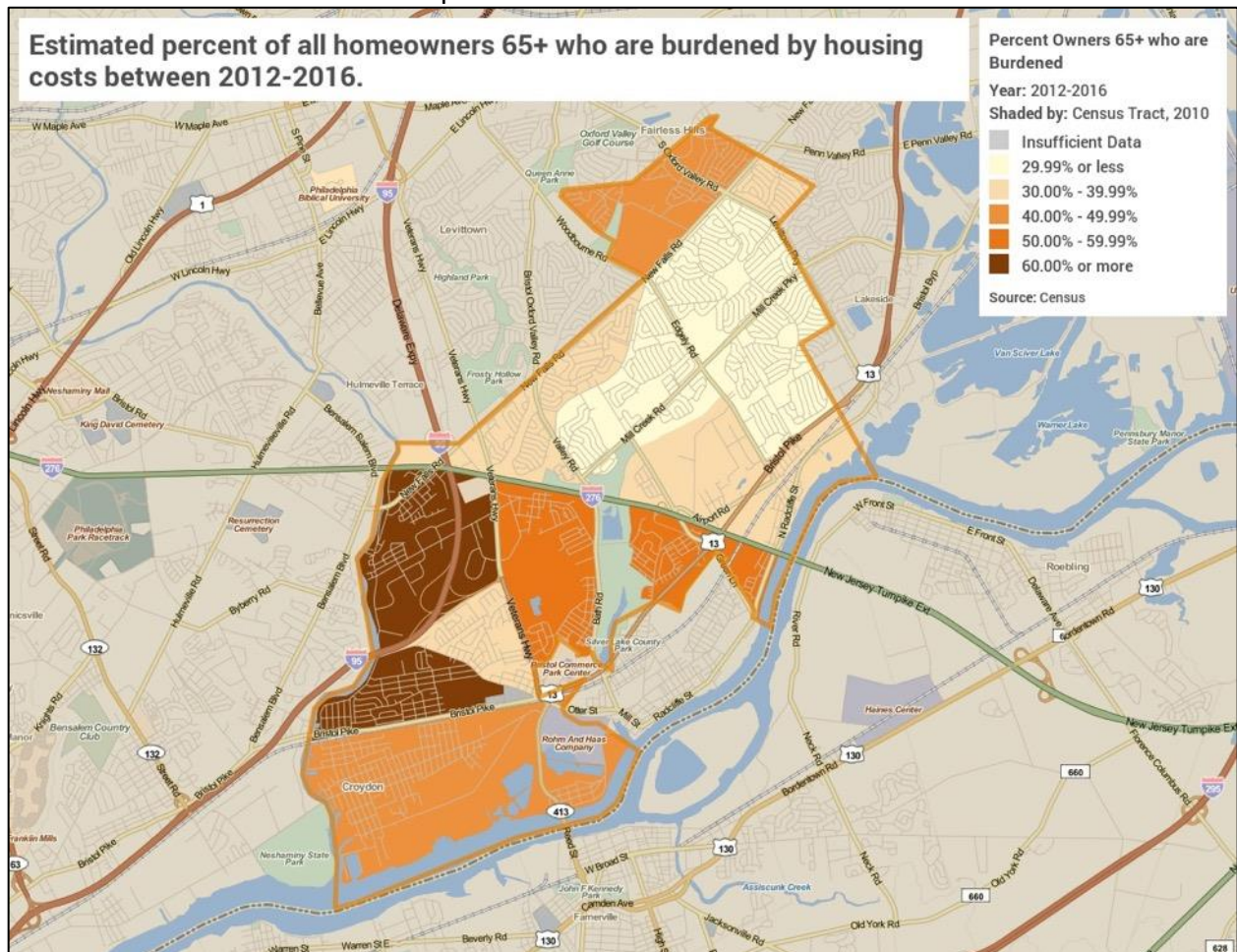
MAP: Cost Burdened Owner-Occupied Households



Source: 2012-2016 ACS via PolicyMap

There is a clear difference in cost burdened concentration across the township. The southern portion of the township has generally higher rates while the north eastern side has lower rates.

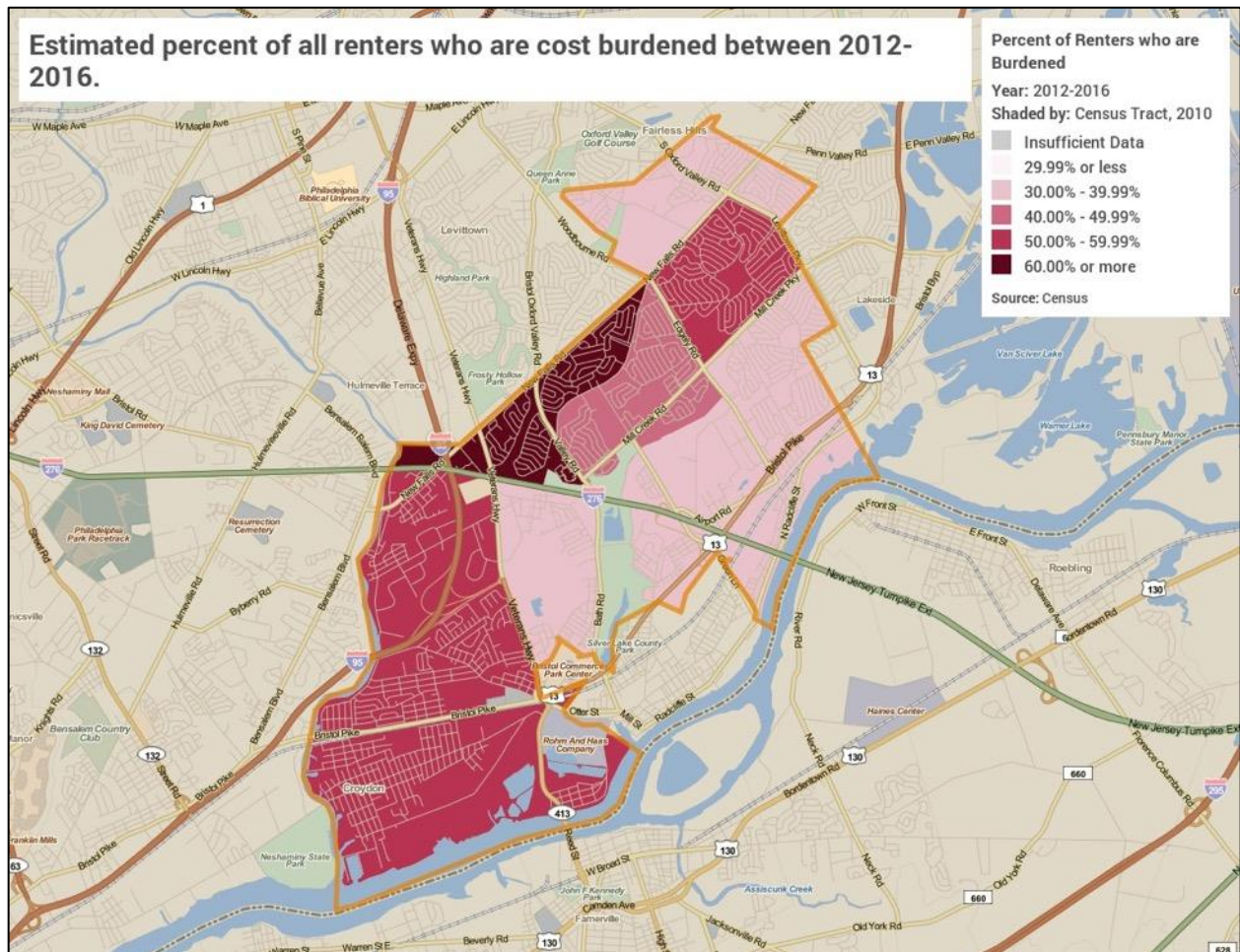
MAP: Cost Burdened Owner-Occupied Households 65 Years and Older



Source: 2012-2016 ACS via PolicyMap

The highest concentration of cost burdened homeowners aged 65 and older is on the west side of the Township. Similar to the population as a whole, the area with lower rates of elderly cost burdened homeowners is in the eastern tracts.

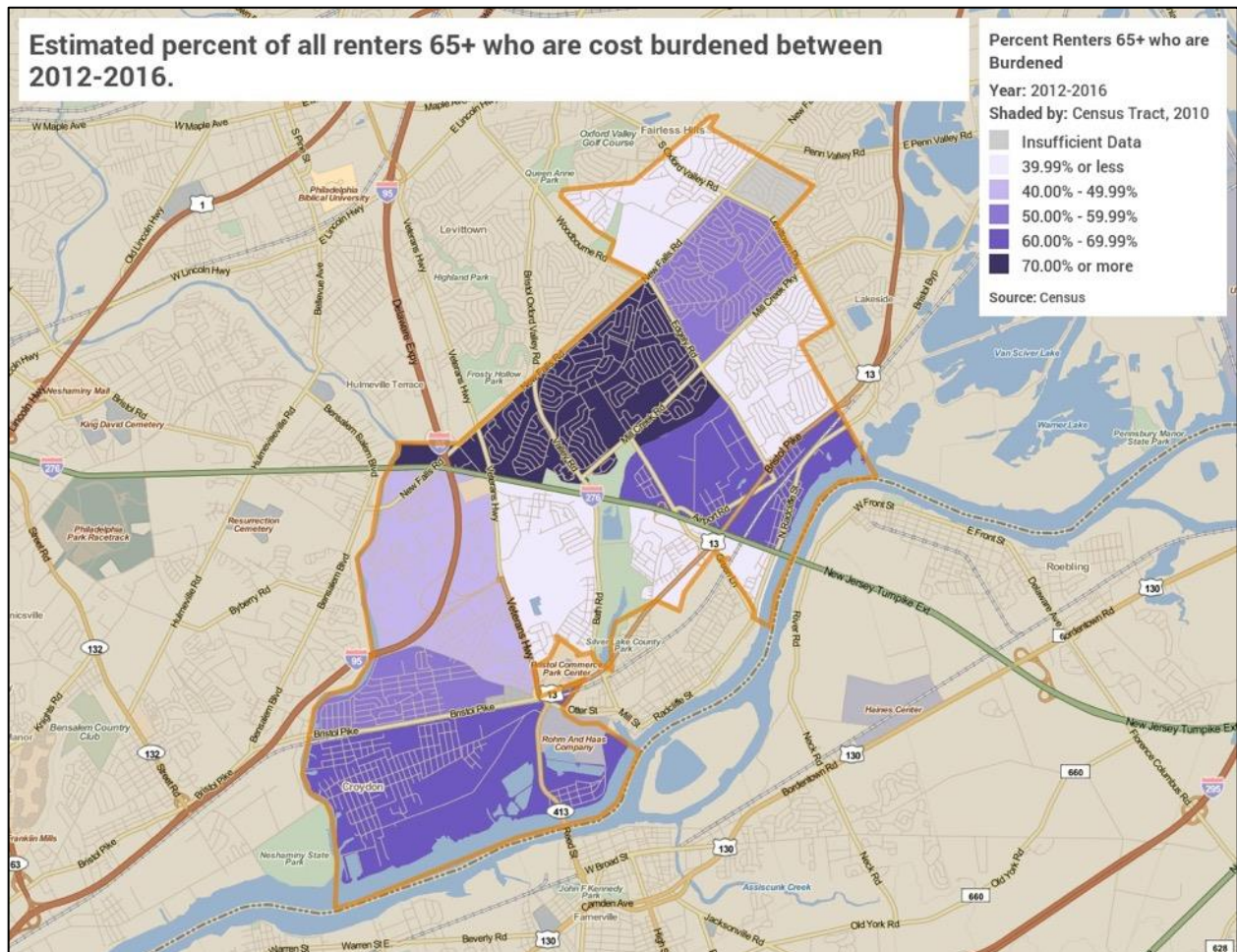
MAP: Cost Burdened Renter Households



Source: 2012-2016 ACS via PolicyMap

Renters in Bristol Township are significantly more likely to be cost burdened than homeowners. The highest concentration of cost burdened renters (60% or more) is in north central tracts.

MAP: Cost Burdened Renter Households 65 Years and Older



Source: 2012-2016 ACS via PolicyMap

Cost burdened renters aged 65 and over are heavily concentrated in the central and western tracts. In one area, 70 percent or more of renters aged 65 and over are cost burdened.

Lending Practices

Lending practices in the Township were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and

loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for Bristol Township, summarizing 2017 HMDA data (the most recent year for which data are available), and data between 2007 and 2017 where applicable. Due to geographic constraints at the municipal jurisdiction level with HMDA data, the geography utilized includes all Census tracts that fall within the boundaries of the Township. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2017 Township HMDA Overview

In 2017, there were over 2,500 applications within Bristol Township for loans to purchase, refinance or make home improvements for a single-family home - not including manufactured homes. Of those applications, over 1,100 or 44 percent were approved and originated. This represents a decrease of 65 originations from 2016 and a percentage decrease of approximately 5 percent, a smaller decline than the national decrease of 13 percent over the same time period. Of the remaining 1,430 applications, approximately 400 or 16 percent of all applications were denied. The top two application denial reasons within the Township were credit history (33 percent) and debt-to-income ratio (26 percent), representing nearly 60 percent of the Township’s total denials. Lack of collateral and incomplete applications represented 15 and 13 percent of denials respectively. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, the data analyzed reflects only the primary reason for the denial of each loan. The balance of the 1,030 applications, that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by

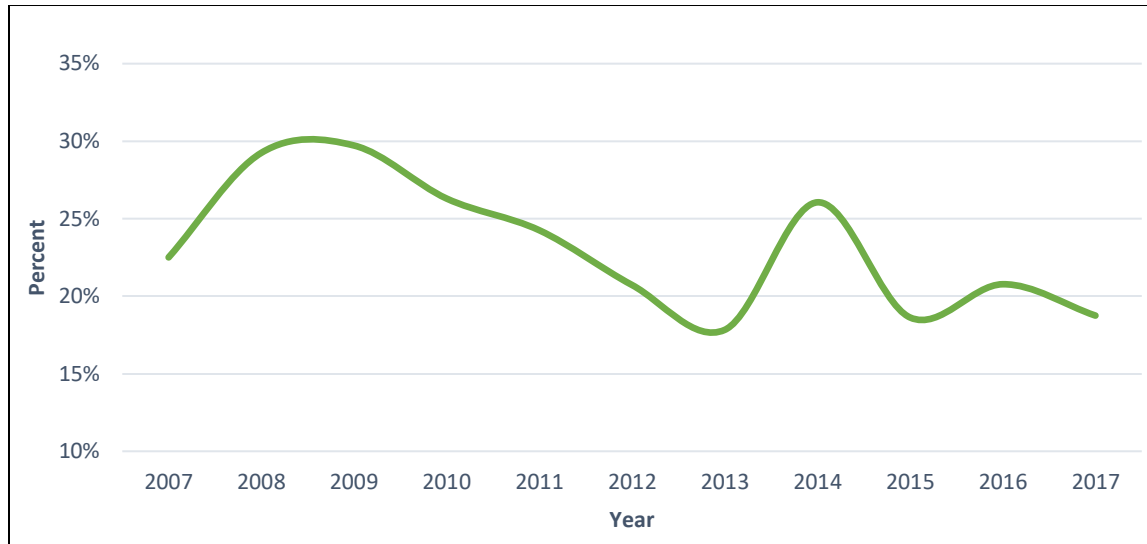
the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant.

Table: Disposition of Application by Loan Type and Purpose, 2017 Single Family Homes (excluding manufactured homes)				
	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	437	638	209
	FHA	674	353	13
	VA	100	132	7
Loans Originated				
	Conventional	271	260	93
	FHA	309	98	3
	VA	52	49	0
Loans Approved but Not Accepted				
	Conventional	8	31	3
	FHA	7	25	1
	VA	1	4	1
Applications Denied				
	Conventional	30	123	93
	FHA	45	70	1
	VA	7	24	5
Applications Withdrawn				
	Conventional	55	125	11
	FHA	52	57	3
	VA	14	28	1
Files Closed for Incompleteness				
	Conventional	8	59	6
	FHA	10	44	2
	VA	3	15	0
Source: 2017 HMDA				

A further examination of the 398 denials within Bristol Township during 2017 indicates that approximately 55 percent were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The top reasons for denial of refinance applications were credit history and debt-to-income ratio, each at 23 percent. Incomplete applications and lack of collateral each represented 19 percent of all refinance denials. Typically, homeowners, seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage. Shown below, the percentage of refinance denials given for the reason of lack of

collateral has broadly trended downward since the peak of the housing crisis, suggesting that the number of “under-water” homes in Bristol Township has declined since 2009.

CHART: Lack of Collateral as a Share of Refinance Denials



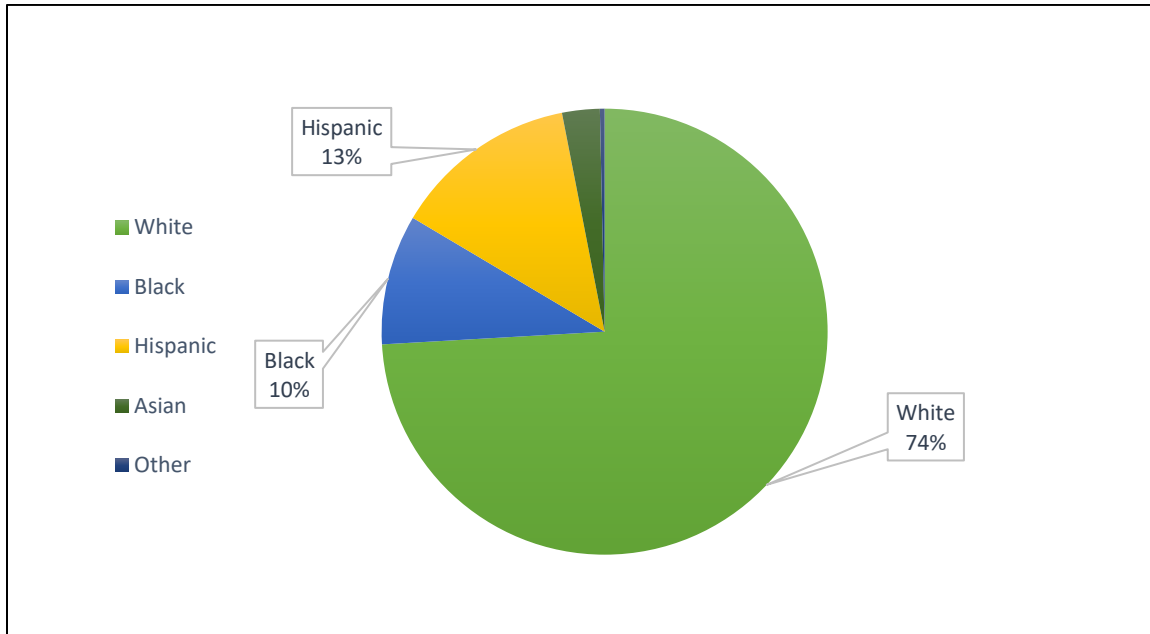
Source: HMDA

Home Purchase Lending in Bristol Township

Of the home purchase loans for single family homes that were originated in 2017, (632 loans originated) approximately 43 percent of these originations were provided by conventional lenders, lower than the national conventional home purchase share of 64 percent. The remaining 57 percent of home purchase loans in Bristol Township were provided by federally-backed sources including the Federal Housing Administration (FHA) and the Department of Veterans Affairs (VA). Nonconventional loans, including the FHA and VA lending programs, have relatively lower down-payment requirements in comparison to conventional lenders. The FHA and VA lenders had application/approval ratios of 39 percent and 42 percent respectively. Conventional lenders, by contrast, originated home purchase loans at a higher 49 percent of all applications.

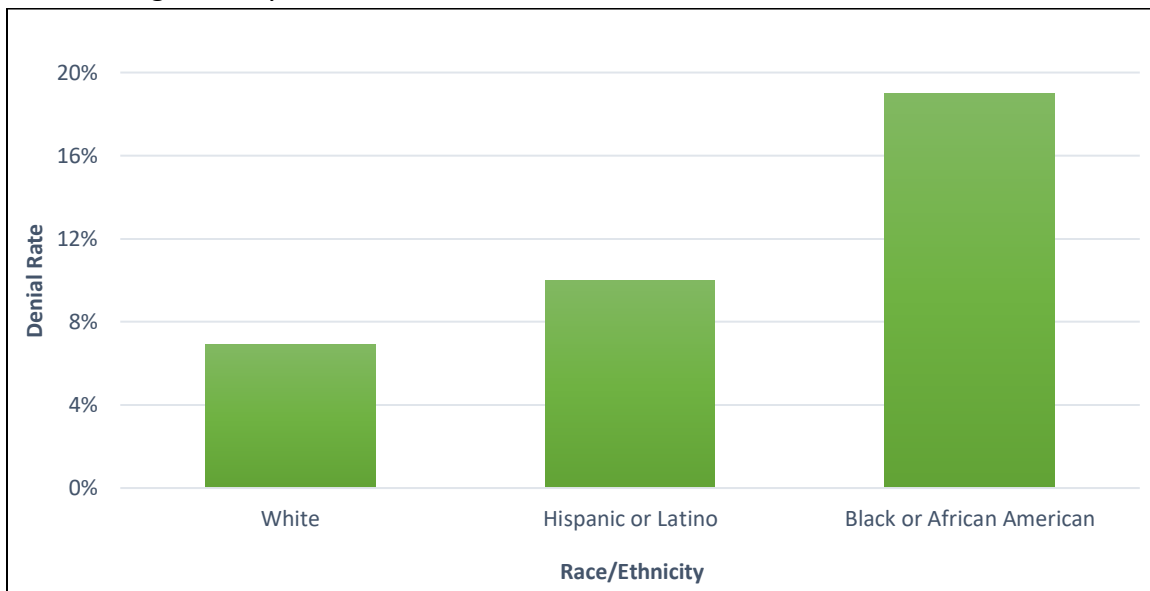
The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Bristol Township varies by race/ethnic groups. The largest applicant group in 2017 were non-Hispanic Whites (74 percent) followed by Hispanics (13 percent). Black and Asian applicants represented approximately 9 percent and 3 percent of all home purchase application respectively. In 2017, Whites were least likely to be denied for conventional single-family home purchases, being denied at a rate of 7 percent, while Black applicants faced the highest conventional home purchase denial rate at 19 percent.

CHART: Composition of Applicants by Race/Ethnicity, 2017



Source: HMDA

CHART: Single Family Conventional Home Purchase Denial Rate, 2017



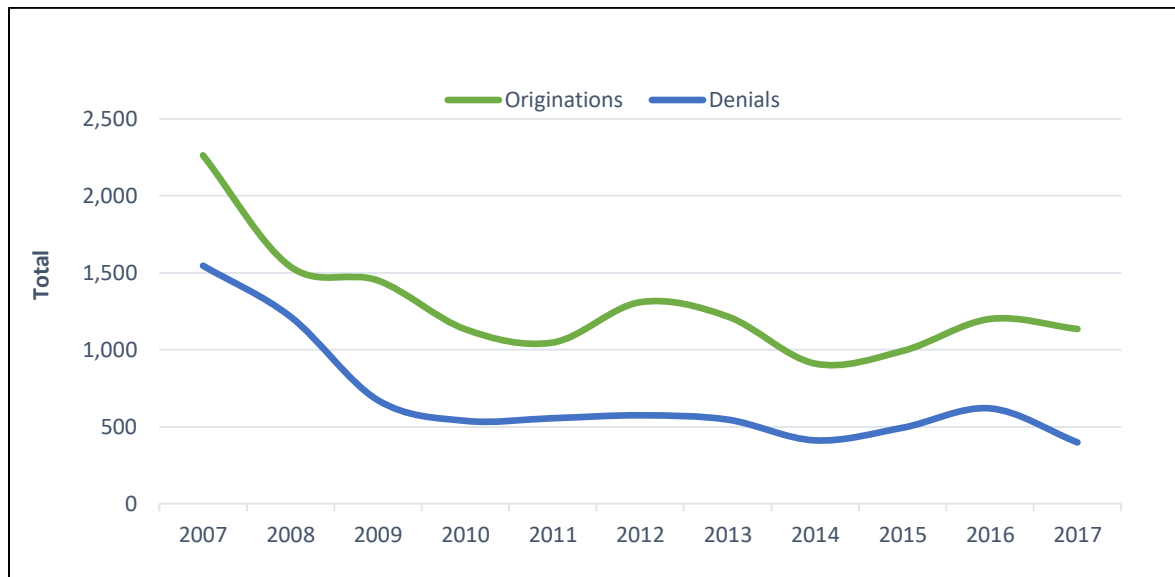
Source: HMDA

Bristol Township's Single-Family Lending Market, 2007-2017

The following section will examine HMDA data over the time period 2007-2017, for Bristol Township.

Highlighted below, the number of single-family loan originations in Bristol Township followed a dynamic, though broadly downward, trajectory between 2007 and 2017. At the onset of the housing crisis, originations declined by 32 percent between 2007 and 2008, followed by a 6 percent decrease between 2008 and 2009. Subsequently, originations trended downward between 2009 and 2011, followed by an increase between 2011 and 2012, the latter year having the highest post-2009 number of originations at 1,309. Loan originations then fell by 25 percent between 2013 and 2014, though grew steadily between 2014 and 2016, followed by a 5 percent decrease between 2016 and 2017. As of 2017, total originations in Bristol Township are 50 percent of the level prior to the housing crisis. In contrast to originations, however, the number of application denials within Bristol Township demonstrated fewer extreme changes between 2007 and 2017, though fell dramatically between 2007 and 2009. As of the most recent data year, denials are 60 percent below the level experienced in 2007. Relatedly, the share of denials as a percent of total originations and total denials has declined since the housing bust, from 41 percent in 2007 to 26 percent as of 2017.

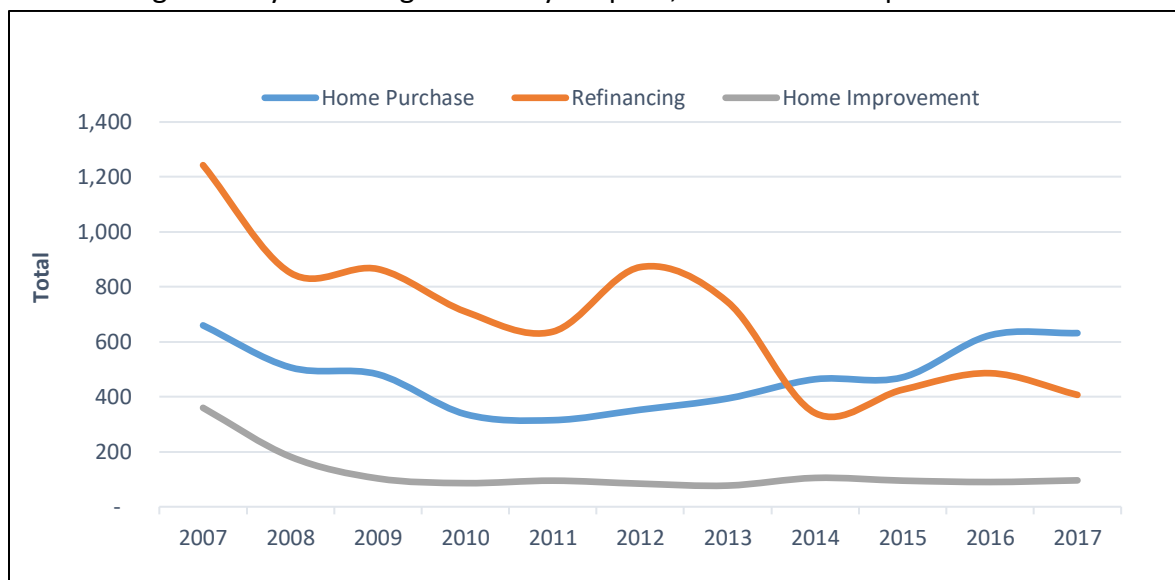
CHART: Single Family Loan Originations and Application Denials, Bristol Township



Source: HMDA

Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2017 were the result of refinancing originations. Refinancing was the top loan purpose by total originations in 2007, though home purchases have been the dominant loan purpose since 2014. In 2017, home purchases comprised 56 percent of the Township's total originations, and the nearly 632 home purchase loans originated is the highest annual total since 2007. The upward trend of home purchase originations since 2011 (48 percent growth rate between 2011 and 2017), reflects a steady and recovering demand for housing within the Township.

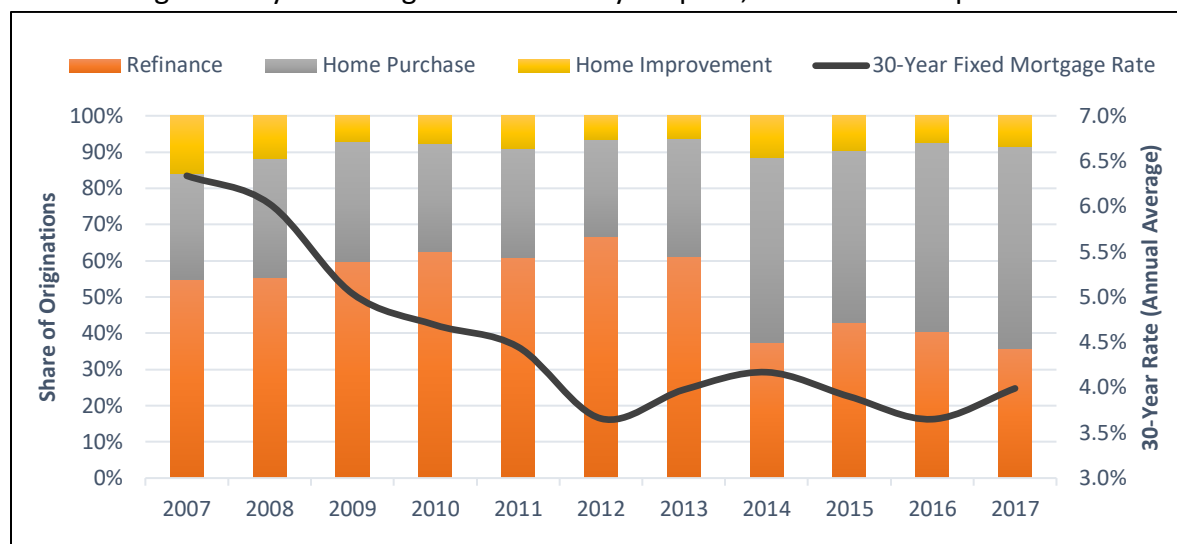
CHART: Single Family Loan Originations by Purpose, Bristol Township



Source: HMDA

The share of refinance originations in Bristol Township appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations reached the highest share of all data years analyzed. Similarly, when interest rates rose between 2012 and 2014, the share of refinance originations fell from 67 percent to 37 percent. The increase in the annual average of the 30-year fixed mortgage rate between 2016 and 2017 is consistent with Bristol Township's 16 percent reduction in the number of refinance loan originations over the same time period.

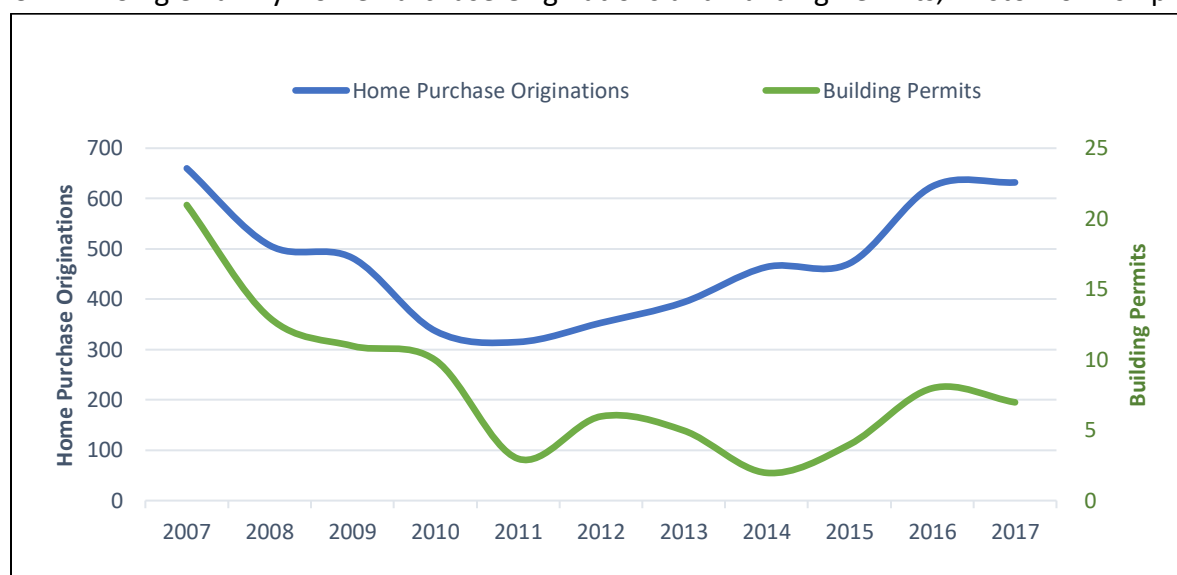
CHART: Single Family Loan Origination Share by Purpose, Bristol Township



Source: HMDA, Federal Reserve Bank of St. Louis

For home purchase loans, the movement of originations often tracks trends in the number of single-family building permits issued. In Bristol Township, however, home purchases have trended upward since 2011 while single family building permits have fluctuated at a level below 10 each year. While the increase in home purchases is indicative of steady and consistent growth in housing demand within the Township, the lack of growth in building permits could suggest pent-up demand for additional housing.

CHART: Single Family Home Purchase Originations and Building Permits, Bristol Township

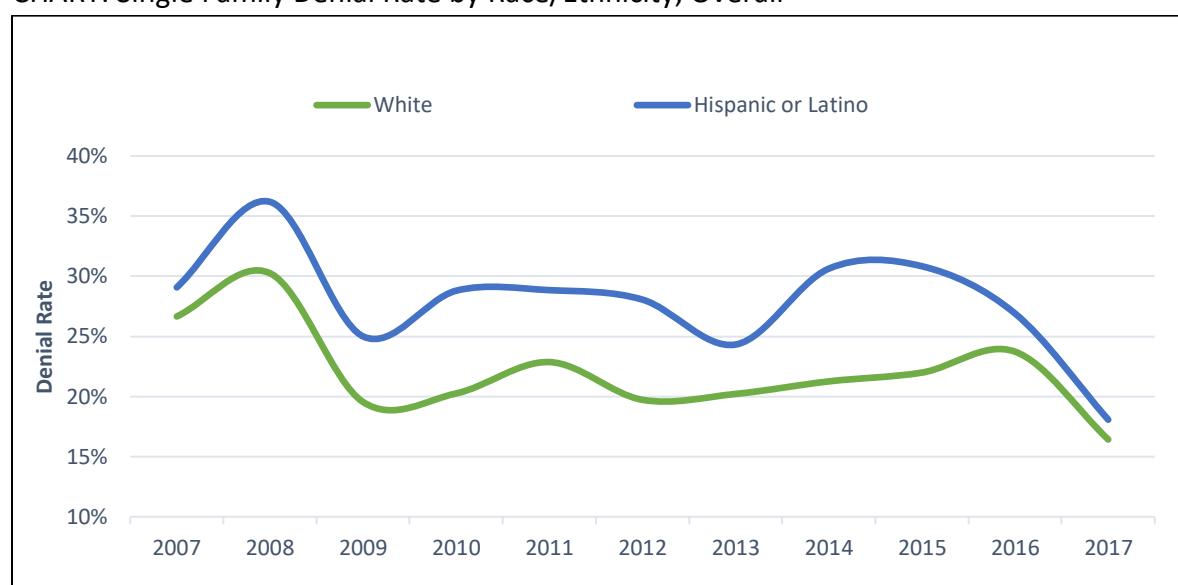


Source: HMDA

Income, Race, and Single-Family Loan Denials in Bristol Township

Denial rates for single-family loans in Bristol Township over time vary by race and ethnicity. The charts below show that between 2007 and 2017, White applicants were consistently less likely to be denied relative to Hispanic applicants. The overall denial rate for Hispanic applicants has fallen during the analysis period, from 29 percent to 18 percent. The denial rate for White applicants fell from 27 percent to 16 percent.

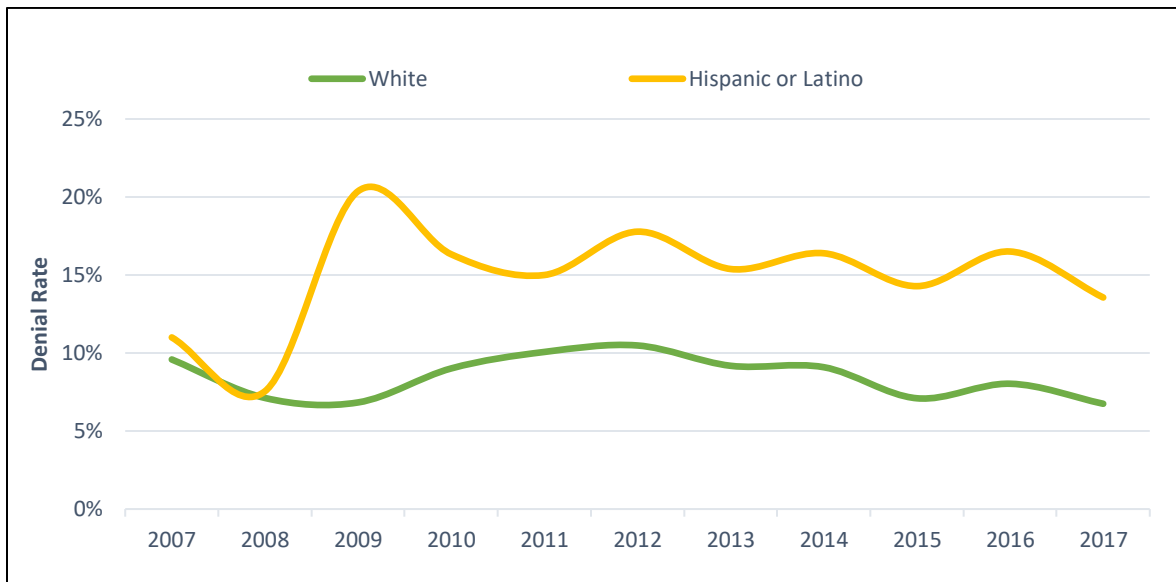
CHART: Single Family Denial Rate by Race/Ethnicity, Overall



Source: HMDA

Home purchase applications exhibit lower denial rates for all applicant groups relative to overall denial rates. However, compared to other loan purposes, home purchase denial rates exhibit a more consistent disparity among White and Hispanics applicants. As of the most recent data year, Hispanics applicants are more than twice as likely to be denied a home purchase than White applicants.

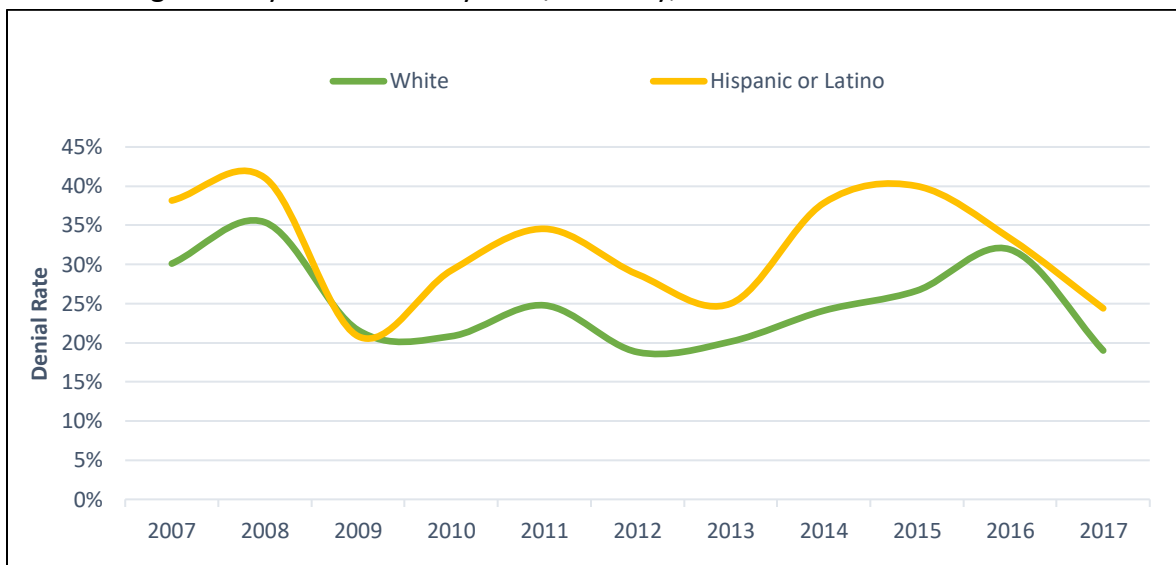
CHART: Single Family Denial Rate by Race/Ethnicity, Home Purchase



Source: HMDA

The denial rate for refinance applications broadly follows the overall denial rate, in part because of refinancing's majority share of total applications between 2007 and 2013 in addition to its higher denial rate compared to other loan purposes. Between 2016 and 2017, the refinance denial rate decreased for White and Hispanic applicants by 13 and 9 percent respectively.

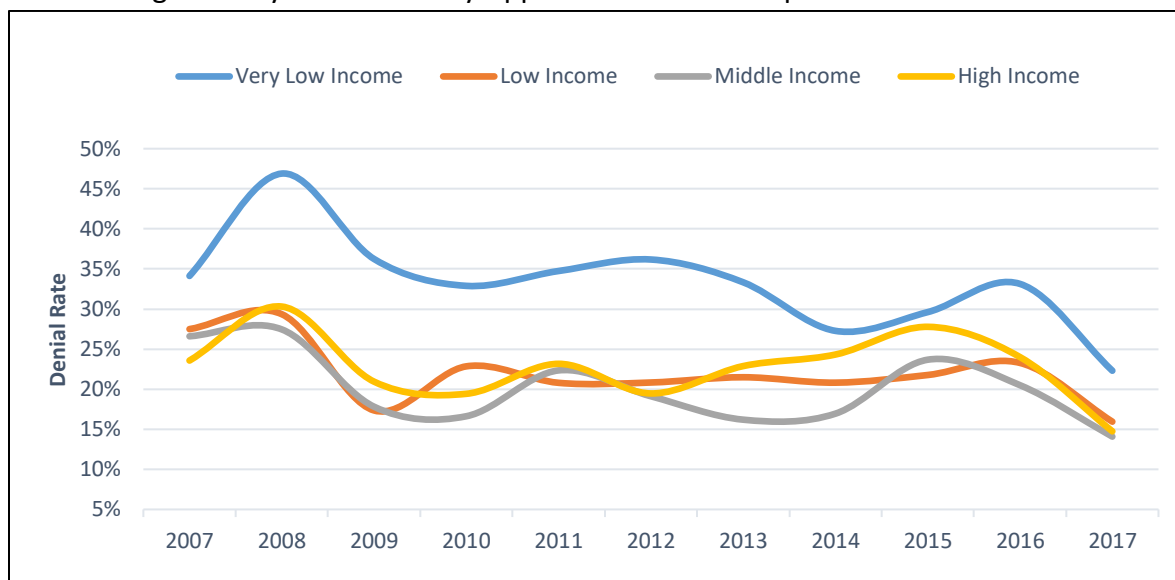
CHART: Single Family Denial Rate by Race/Ethnicity, Refinance



Source: HMDA

A view of single-family denial rates by applicant income group within Bristol Township, highlighted below, shows the variability and relative proximity in denial outcomes among High-Income (greater than 120 percent of Area Median Income), Middle-Income (80 to 120 percent of Area Median Income), and Low-Income (between 50 percent and 80 percent of Area Median Income) applicants. However, Very Low-Income applicants (50 percent of less of Area Median Income) have remained above the other groups in every year examined. The single-family denial rate declined for all income groups between 2016 and 2017.

CHART: Single Family Denial Rate by Applicant Income Group

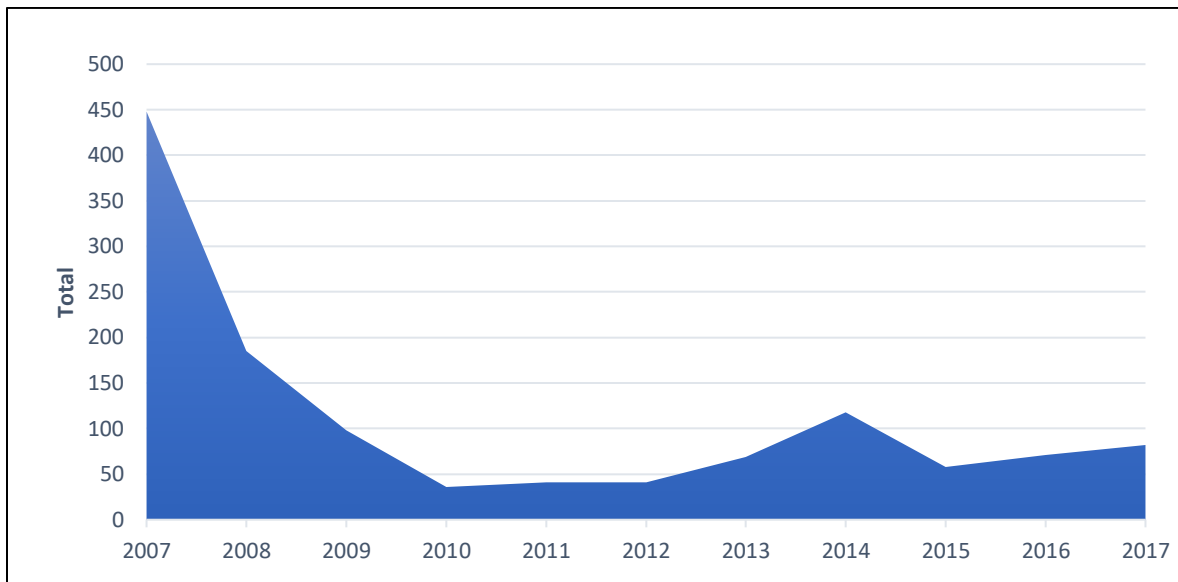


Source: HMDA

The Subprime Market

Illustrated below, the subprime mortgage market in Bristol Township declined significantly between 2007 and 2010, dropping by 92 percent. However, subprime originations more than tripled between 2010 and 2014, before declining to an annual total of 82 in 2017 (approximately 18 percent of the 2007 total). Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations decreased by approximately 82 percent on net between 2007 and 2017, while prime originations decreased by 38 percent during the same time period. Since 2010, however, the number of subprime loan originations has grown by 128 percent, compared to a 4 percent decline for prime originations. As a percent of Bristol Township's total, subprime originations declined from 20 percent to 7 percent between 2007 and 2017.

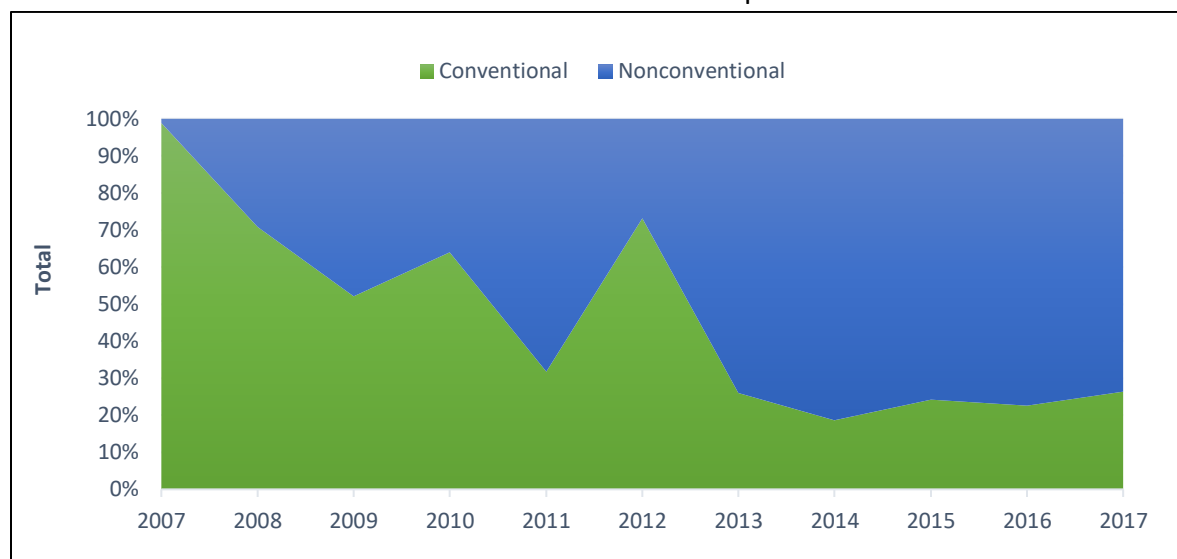
CHART: Single Family Subprime Mortgage Originations, Bristol Township



Source: HMDA

Consistent with broader national trends, the composition of subprime loans within Bristol Township has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, 99 percent of subprime loans within the Township were originated by conventional lenders. As of 2017, that percentage is 26 percent, up from a low of 19 percent in 2014. Of the nonconventional subprime loans originated in Bristol Township the overwhelming majority are insured by the Federal Housing Administration (over 98 percent in 2018). By contrast, the FHA's share of nonconventional prime loans is 78 percent, followed by the Department of Veterans Affairs at 22 percent.

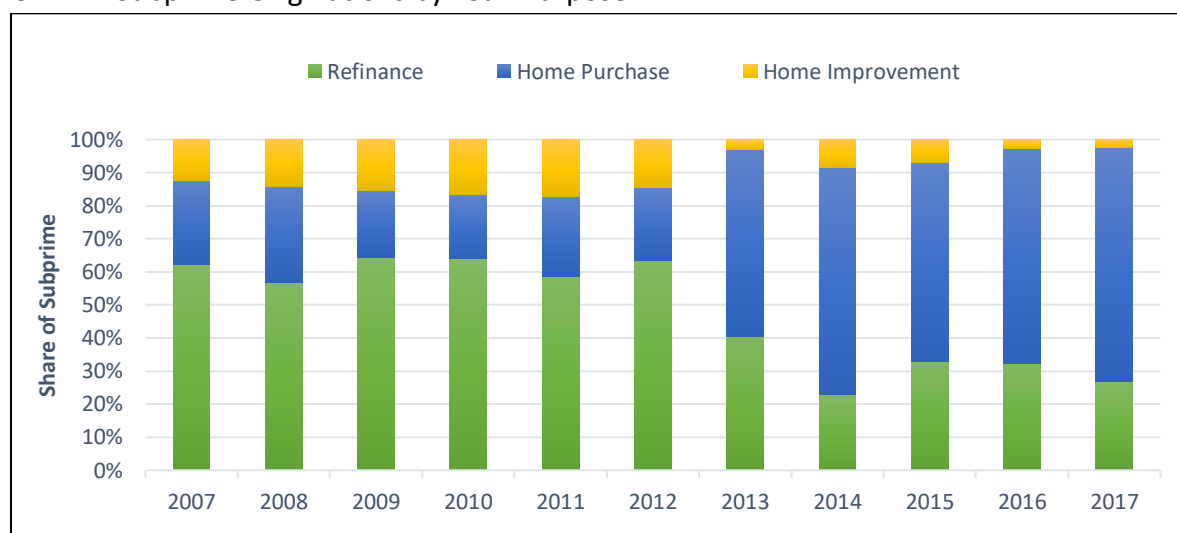
CHART: Conventional and Nonconventional Share of Subprime Total



Source: HMDA

As a percentage of all subprime loan originations within Bristol Township, home purchases represented 71 percent in 2017, the highest share of all years examined. The subprime home purchase share is up from its share of 25 percent in 2007 and a low of 19 percent in 2010. Refinancing represented that majority of Bristol Township's subprime loans between 2007 and 2012, though subprime loans have shifted away from refinancing and toward home purchases in recent years as housing demand has recovered and interest rates have increased.

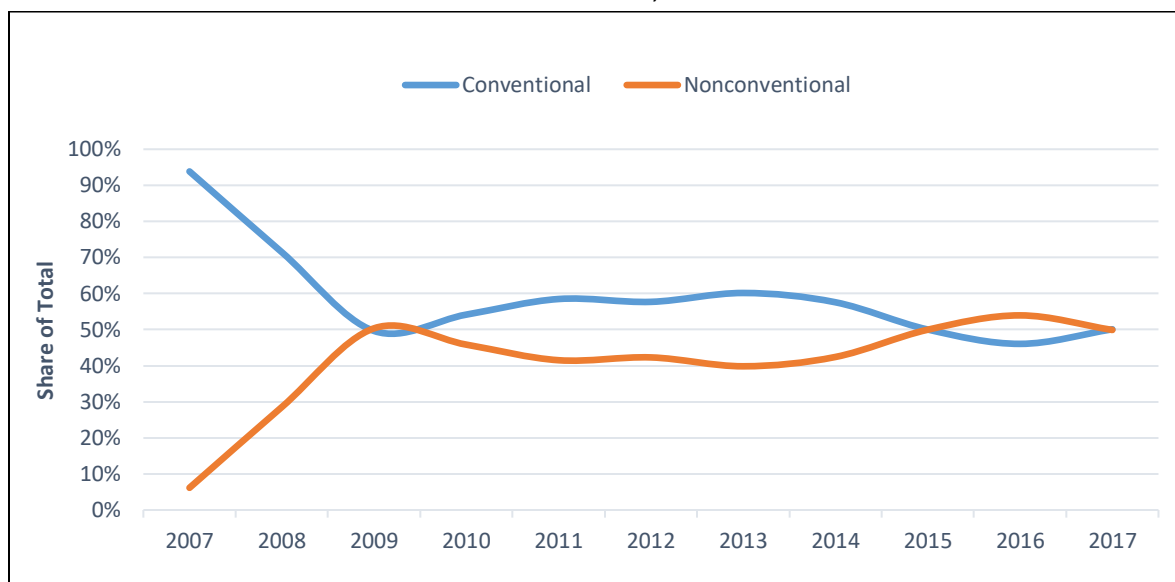
CHART: Subprime Originations by Loan Purpose



Source: HMDA

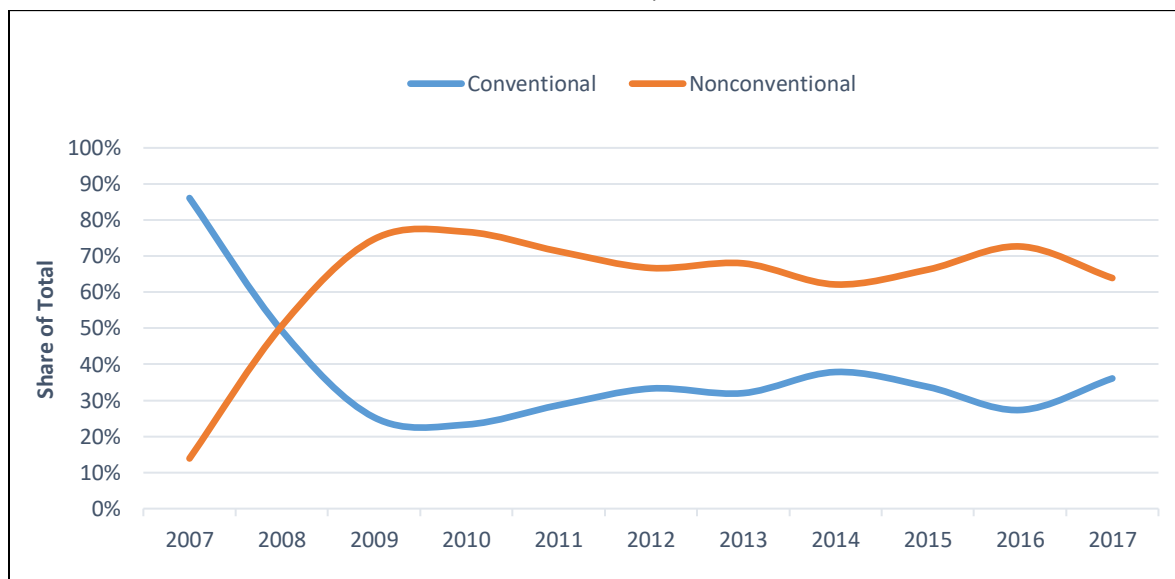
Though subprime loans within Bristol Township are mostly nonconventional, the overall share of conventional and nonconventional loans was evenly split in 2017 at 50 percent. Since 2009, however, the majority of overall home purchase originations have been nonconventional.

CHART: Conventional and Nonconventional Share, Overall



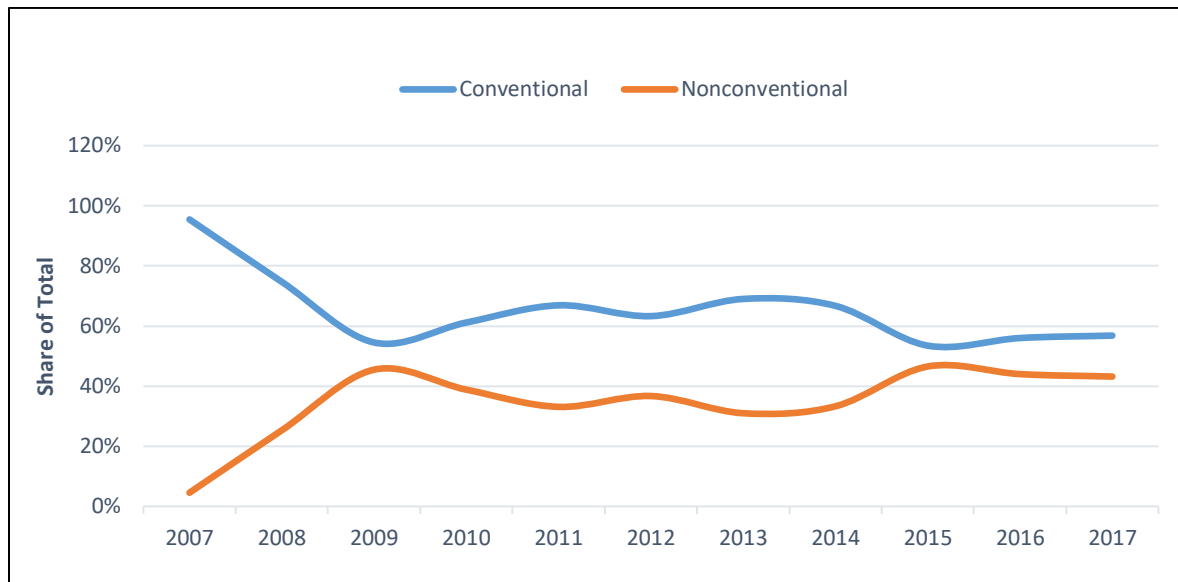
Source: HMDA

CHART: Conventional and Nonconventional Share, Home Purchase



Source: HMDA

CHART: Conventional and Nonconventional Share, Refinance



Source: HMDA

Conclusion

Mortgage lending activity in Bristol Township is consistent with many of the broader trends that have occurred in the wake of the housing crash, Great Recession, and subsequent economic recovery.

Home purchase originations have increased every year since 2011 and in 2017 were at the highest level since 2007, suggesting signs of growing housing demand and a housing market recovery within the Township. Additionally, the share of refinance applications denied for lack of collateral, suggesting an “under-water” home, has declined since the peak of the housing crisis.

The Township has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations and a subprime lending market that remains well below its peak prior to the housing bust. Government-insured mortgages have increased, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for Hispanic applicants relative to White applicants, in addition to higher denial rates for lower income applicants.

Community Reinvestment Act (CRA)

Since the passage of the Community Reinvestment Act (CRA) in 1977, banks have been strongly encouraged to serve the credit needs of all persons within the community, including those with low and moderate incomes. The CRA establishes a regulatory mechanism for monitoring the level of lending, investments and services in low- and moderate-income neighborhoods that have traditionally been underserved by lending institutions. While most mortgage companies, finance companies, and credit unions are required by HMDA to provide information on their lending activities, many are exempt from CRA coverage and its examination process. Because only federally-insured financial institutions are covered by CRA, mortgage companies, finance companies and credit unions are all exempt from CRA regulations. Commonly, it is considered that only depository financial institutions are covered by CRA.

Currently, three Federal Financial Institutions Examination Council (FFIEC) agencies conduct CRA examinations and enforcement: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC). The Office of Thrift Supervision (OTS) was a fourth reporting agency, however as of June 30, 2011 it is no longer an active regulatory agency. Examiners from the three FFIEC agencies assess and “grade” lenders’ activities in low- and moderate-income neighborhoods. Large institutions are graded on how well they meet their CRA obligation according to a three-part test that evaluates actual performance in lending, investing, and providing banking services to the entire community including low- and moderate-income (LMI) borrowers and borrowers (individuals or businesses) located in LMI areas. Smaller institutions are subject to a more streamlined examination that focuses on lending.

Lending institutions receive one of four ratings or grades after a CRA exam. The top two ratings of “Outstanding” and “Satisfactory” mean that a federal examiner has determined that a lender has met its obligation to satisfy the credit needs of communities in which it is chartered. The two lowest ratings, “Needs to Improve” and “Substantial Noncompliance,” reflect a failure on the part of the lending institution to meet the credit needs of communities, particularly the low- and moderate-income communities, in which it is chartered. The three federal agencies examine large banks approximately once every two years. However, large lending institutions with Satisfactory ratings may be examined once every four years and institutions with Outstanding ratings may be examined once every five years.

While poor CRA ratings do not result in immediate sanctions for a lender, receipt of a low CRA rating can curtail an institution’s future plans for service changes or mergers with other financial institutions. When a lender plans to merge with another institution or open a new branch, they

must apply to the Federal Reserve Board and/or to its primary regulator for permission. Receipt of one of the two lowest CRA ratings is considered in the review of the application by the federal agency. The reviewing federal agency has the authority to delay, deny, or add conditions to an application.

A review of the most recent CRA ratings in the last ten years for nearby Bristol Township lenders surveyed for this analysis reveals that all of the depository financial institutions have received ratings of Satisfactory (source: FFIEC CRA Rating Database 2018).

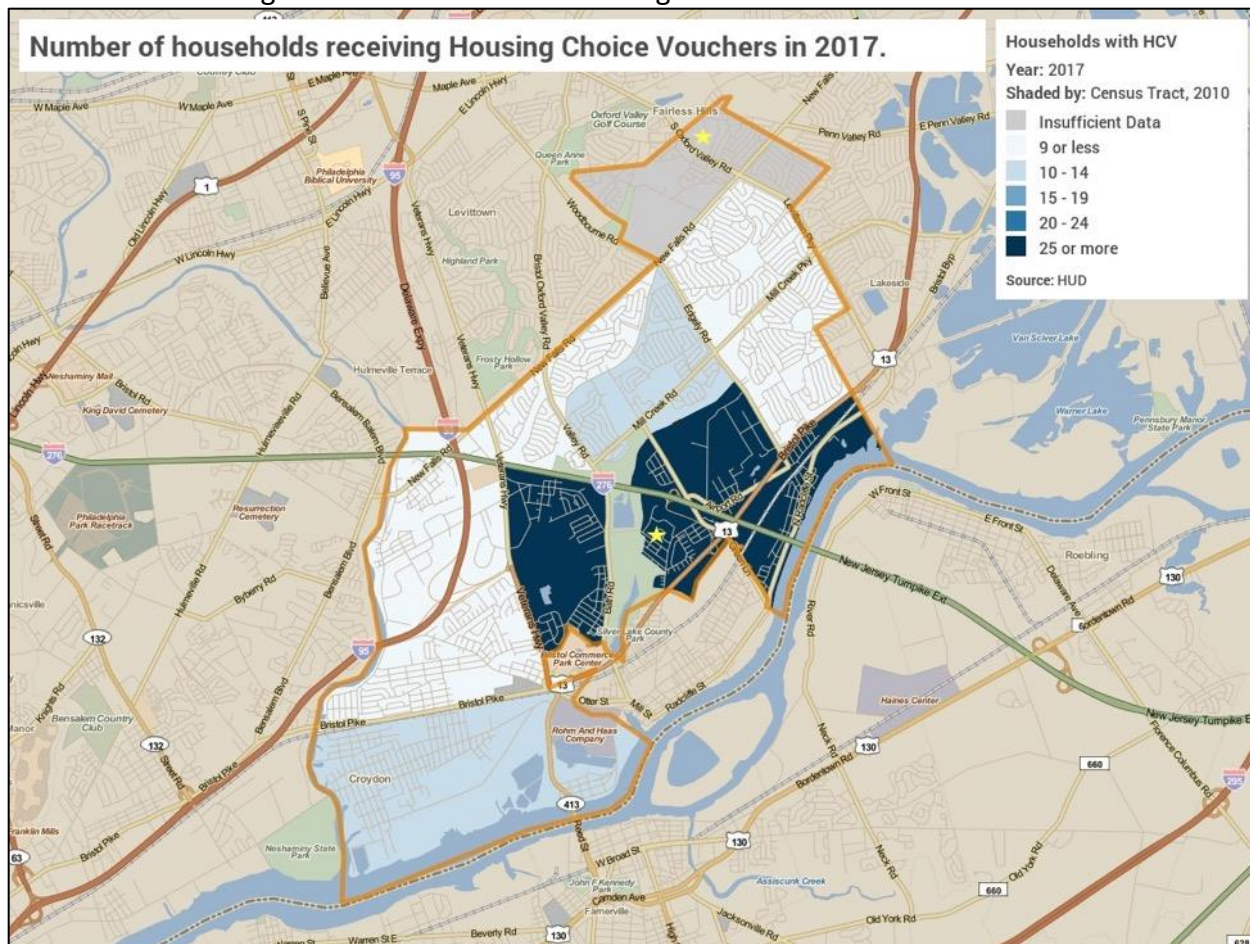
Below is a chart of nearby Bristol Township, Pennsylvania lenders and their CRA ratings in the last 10 years.

TABLE: Bristol Township Lenders CRA Ratings (2008-2018)				
Bank	CRA Rating	Rating Period	Bank Size	Location
FIDELITY S & LA OF BUCKS COUNTY	Outstanding	12/08/2008	Small Bank	Bristol, PA
FIRST FS & LA OF BUCKS COUNTY	Satisfactory	3/16/2009	Intermediate Small Institution	Bristol, PA
WILLIAM PENN BANK	Satisfactory	05/03/2010	Intermediate Small Institution	Levittown, PA
FIRST FS & LA OF BUCKS COUNTY	Satisfactory	05/07/2012	Intermediate Small Institution	Bristol, PA
FIDELITY SAVINGS & LOAN ASSOCIATION OF BUCKS COUNTY	Satisfactory	06/01/2014	Small Bank	Bristol, PA
WILLIAM PENN BANK	Satisfactory	08/01/2014	Intermediate Small Institution	Levittown, PA
WILLIAM PENN BANK	Satisfactory	05/01/2017	Intermediate Small Institution	Levittown, PA
Source: FFIEC CRA Rating Database 2018				

Public Housing Authority

The Bucks County Housing Authority (BCHA) is the public housing agency functioning within Bristol Township, Pennsylvania. The map below displays the public housing development location and voucher concentration in the area. Note: Yellow stars represent public housing development units.

MAP: Public Housing and Concentration of Housing Choice Vouchers



Source: HUD REAC via PolicyMap

The Bucks County Housing Authority's mission is to assist low-income families with safe, decent, and affordable housing activities. They manage Grundy Tower in Bristol Township, a 176-unit senior complex for low income seniors. The waiting list is currently open but wait time is unknown. BCHA currently administers the Housing Choice Voucher Program but it is currently closed.

Public Sector Analysis

Overview

Fair Housing is the right of individuals to obtain the housing of their choice, free from discrimination based on race, color, religion, sex, disability, familial status, or national origin. This right is assured by the Federal Fair Housing Acts of 1968 and 1988, as amended, which make it unlawful to discriminate in the sale, rental, financing, or insuring of housing.

The Fair Housing Acts, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land-use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances segregate uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land-use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

Zoning ordinances aimed at controlling the placement of group homes are one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless, and individuals with special needs have filed complaints against restrictive zoning codes that narrowly define "family" for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. For many people who are disabled, the group home arrangement/environment provides the only affordable housing option for residential stability and more independent living. By limiting the definition of "family" and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

This Analysis of Impediments to Fair Housing Choice for Bristol Township discusses the results of recent analyses of impediments and the steps the township intends to take to implement policies that will prevent and eliminate housing discrimination in the community.

Citizen Participation

This section outlines the Citizen Participation guidelines by Bristol Township and the steps the township takes to involve the public and shareholders in the development of fair housing and HUD programs in Bristol Township.

2018 Fair Housing Survey

In an effort to assess the general public's knowledge of and attitude about fair housing issues in Bristol Township, online survey was administered to gather information about fair housing. Questions from the survey ranged from demographic information, housing affordability, access to jobs and transportation, to fair housing and discrimination in an effort to gauge the state of fair housing in the township. The fair housing survey was disseminated online in the fall of 2018 from November 1 – December 15. Below are the highlights from the results of the survey.

Overall, 54 people responded to the survey. The participants spanned all age groups over the age of 25 without any particular group being over represented. Nearly two-thirds of the respondents were female and over 85% were White. The largest income group, making up 24% of the responses, was those with a household income of \$50,000-\$74,000. There were no respondents whose income was less than \$25,000. Nearly 85% of the survey participants were home-owners.

The results of the survey indicate that there is room for improving the knowledge of residents about fair housing. Nearly 80% of the respondents rated their understanding of fair housing laws and housing discrimination as "Poor or Average". Approximately 43% said that fair housing education is "Very Important".

According to the results of the survey housing discrimination is not a major problem but there are some reported cases. Approximately 27% stated that discrimination is "Fairly Prevalent or Very Prevalent". Just over 10% of respondents stated that they have been discriminated against in housing. Three-quarters faced discrimination based on race and the remaining 25% based on familial status. The majority of discrimination is faced in the rental markets.

Citizen Participation Plan

Bristol Township adheres to its Citizen Participation Plan adopted in April 2016. In accordance with that plan, Bristol Township hosts training sessions, attends neighborhood outreach meetings, holds public meetings and hearings, places copies of various CDBG plans and reports on the township's website, makes copies of the plans available for review in both draft and final forms, and accepts and incorporates citizen input and feedback. Along with the annual processes, the public is advised of all program planning activities, actions, and plan amendments by published notices, the township's website, and personal mailings as appropriate. In order to improve program outcomes, Bristol Township also collaborates and cooperates with other governmental agencies, as well as a number of profit and non-profit organizations, to develop viable program activities. For all CDBG activities, Bristol Township works to provide full

accessibility for the disabled and provides translation and hearing-impaired services for those who request them.

As stated in the Bristol Township Citizen Participation Plan: Citizen Participation must be an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting meetings/hearings. HUD, in its attempt to assure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance, and record maintenance requirements. The township adheres to these requirements.

The CDBG Program is administered by the Office of Community Development of Bristol Township. The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at the Municipal Building to review the Annual Action Plan and the Consolidated Annual Performance Evaluation Report as well as any amendments or changes to the Consolidated Plan and/or the Assessment of Fair Housing (AFH). All meetings/hearings are advertised in accordance with applicable HUD, state and local regulations. Public notices for environmental procedures and project related purposes are also part of the citizen participation process.

Bristol Township will also consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The township will also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the Consolidated Plan and the AFH, including participants in the Fair Housing Assistance Program, Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program, and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. The consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the township's jurisdiction.

Pennsylvania Human Relations Act

Act of 1955, P.L. 744, No. 222, AS AMENDED JUNE 25, 1997 BY
Act 34 OF 1997, 43 P.S. §§ 951-963

The Pennsylvania Human Relations Act prohibits discrimination in obtaining employment and housing based on the race, color, national origin, religion, sex, familial status, disability, age, and ancestry for people in Pennsylvania.

Legislation Pertaining to Fair Housing

Numerous acts, laws, and presidential executive orders have been enacted in order to create fair housing opportunities throughout the US. The following information can be found on the website for the US Department of Housing and Urban Development (HUD). Some of the legislation in the section below does not directly address fair housing, but is included because it promotes the prevention and termination of discrimination, which is related to fair housing law.

Presidential Executive Order 11063

John F. Kennedy, in 1963, created the first piece of fair housing legislation by issuing presidential executive order 11063. The terms of the order stated that “discrimination in the sale, leasing, rental, or other disposition of properties and facilities” is prohibited if the properties or facilities are owned, operated, or funded by the government.

Civil Rights Act of 1964

According to Title VI of the Civil Rights Act of 1964, “discrimination on the basis of race, color, or national origin” is prohibited in programs and activities receiving federal financial assistance.

Presidential Executive Order 11246

Lyndon B. Johnson, in 1965, issued executive order 11246. According to this amended presidential order, discrimination based on race, color, religion, sex, or national origin was forbidden in federal employment.

Fair Housing Act

The Fair Housing Act, which is Title VIII of the Civil Rights Act of 1968, prohibits discrimination or other unfair actions against persons, which “otherwise make unavailable or deny a dwelling to any person because of race, color, religion, sex, familial status, or national origin.” The act prohibits both intentional housing discrimination — disparate treatment — and action or policies that may not seem to discriminate but do have a negative effect on fair housing choice —

disparate impact. The federal Fair Housing Act provides for a broad range of sanctions and remedies to cure existing and prevent future violations.

Architectural Barriers Act

In 1968 the Architectural Barriers Act was enacted to increase accessibility for handicapped individuals. The act “requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds [...] must be accessible to and useable by handicapped persons.”

Education Amendments Act

Title IX of the Education Amendment Act of 1972 prohibits discrimination on the basis of sex. This applies to federally funded education programs or activities.

Rehabilitation Act

The Rehabilitation Act of 1973 is a provision of the federal Fair Housing Act administered by HUD. Section 504 of the act prohibits a “refusal to make accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford them [the handicapped person] equal opportunity to use and enjoy a dwelling [...] including public and common use areas.” This act includes nearly all public activities that can adversely affect housing for handicapped people and is not limited to federally funded projects.

Housing and Community Development Act

Section 109 of Title I of the Housing and Community Development Act of 1974 protects against discrimination when HUD funds are involved. That is, programs and activities receiving financial assistance from HUD’s Community Development Block Grant Program cannot discriminate based on race, color, national origin, sex, or religion.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), passed by Congress in 1975, was created in order to make loan information publicly available. HMDA mandates that information to help determine how financial institutions are responding to the housing needs be made available to local communities. HMDA also assists public officials in attracting private investors. Additionally, the Act aids in identifying discriminatory lending practices. HMDA requires the disclosure of information from banks, savings associations, credit unions, and other mortgage lending institutions. The required information includes the distribution of home mortgage and home improvement lending on a geographic and demographic basis such as the distribution of mortgage loans to minorities. More specifically, reporting requirements include data on the number, type, and amount of loans as well as the type of action taken — applications approved but not accepted, applications denied, applications withdrawn, or files closed as incomplete. For

more information see: (<http://www.ffiec.gov/hmda/history.htm>).

Age Discrimination Act

The Age Discrimination Act of 1975 prohibits discrimination on the basis of age. This applies to federally funded programs or activities.

Community Reinvestment Act

According to the U.S. Environmental Protection Agency, lenders, developers and property owners are concerned about the cost and liabilities of cleaning up and refinancing low-to-moderate income urban neighborhoods, leading them to develop in other areas that are perceived to be less risky. The Community Reinvestment Act (CRA) was enacted by Congress in 1977, to “require banks, thrifts, and other lenders to make capital available in low- and moderate-income urban neighborhoods, thereby boosting the nation’s efforts to stabilize these declining areas.” For more information see: (<http://www2.epa.gov/brownfields>).

The CRA applies to: federally insured depository institutions, national banks, thrifts, and state-chartered commercial and savings banks. It works to prevent redlining – discrimination by refusing to grant loans, mortgages or insurance to people in a specific area, particularly those deemed poor or to be “financial risks.”

The CRA requires that each insured bank’s record of helping meet the credit needs of its entire community be evaluated periodically. There are several organizations that work to promote and ensure the credibility and compliance of all lenders subject to the CRA: Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRS), and the Federal Deposit Insurance Corporation (FDIC). The Office of Thrift Supervision (OTS) as of 2011 is no longer an active regulatory agency. The following active institutions are required to report data under the CRA:

- All savings associations except small institutions (those with total assets equaling less than \$1 billion in the past 2 years) regulated by the OTS.
- All state member banks, state nonmember banks, and national banks except small institutions (those with total assets less than \$250 million in the past 2 years) regulated by the FRS, FDIC, and OCC.

Amendment of the Federal Fair Housing Act

In 1988 the federal Fair Housing Act was amended to include handicapped persons among those protected; those with one or more handicaps are discriminated against when there is a failure to make reasonable modifications to residential premises which may be necessary to enable a handicapped person “full enjoyment of the premises.”

Americans with Disabilities Act

Title II of the Americans with Disabilities Act of 1990 prevents discrimination against disabled persons. More specifically, public programs, services, and activities cannot discriminate based on disabilities. Further, “HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals.”

Presidential Executive Order 12892

In 1994 President William J. Clinton issued his first presidential executive order pertaining to fair housing. The amended executive order 12892 “requires federal agencies to affirmatively further fair housing in their programs and activities.”

Presidential Executive Order 12898

In 1994, President Clinton issued his next presidential executive order pertaining to fair housing. According to executive order 12898, federal agencies must conduct programs, policies, and activities that have an impact on the environment and individuals’ health in a way that does not exclude anyone based on race, color, or national origin.

The Quality Housing and Work Responsibility Act

The Quality Housing and Work Responsibility Act (QHWRA), signed by President Clinton in 1998, applies to public housing and public housing voucher programs. Its purposes range from “reducing the concentration of poverty in public housing,” to creating opportunities and incentives for public housing residents to find work, to rehabilitating public housing units through the establishment of the HOPE VI program.

Presidential Executive Order 13166

In 2000, President Clinton issued his final presidential executive order pertaining to fair housing. Executive order 13166 strives to eliminate the barrier caused by poor English proficiency that would deny benefits from federally funded programs and activities.

Presidential Executive Order 13217

In 2001, President George W. Bush issued the most current fair housing-related executive order. His executive order 13217 requires federal agencies to examine their policies and programs in order to find way to improve the availability of “community-based living arrangements for persons with disabilities.”

Promoting Fair Housing and Fair Lending

U.S. Department of Housing and Urban Development

In 1965, the Department of Housing and Urban Development Act created the Department of Housing and Urban Development (HUD) as a Cabinet-level agency. The Civil Rights Act of 1968 made most types of housing discrimination illegal and gave HUD “enforcement responsibility” when dealing with fair housing practices. The official website for HUD states that the department’s primary purpose is to “promote non-discrimination and ensure fair and equal housing opportunities for all.” HUD’s main responsibilities involve “implementing and enforcing a wide array of civil rights laws, not only for members of the public in search of fair housing, but for HUD funded grant recipients as well,” and are enforced by a group of laws known as the Civil Rights Related Program Requirements, or CRRPRs.

HUD-funded grant recipients are obligated by law not to discriminate “in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability.” According to the FHA, the Secretary of HUD “shall administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies outlined” within sections of the Act. Some examples of these programs and activities include but are not limited to offering counseling programs, establishing fair housing enforcement organizations in areas of need, working with housing providers, and encouraging banks and lenders to use more non-traditional credit evaluation methods.

The amended Housing and Community Development Act of 1974 is the primary law for the Community Development Block Grant (CDBG) Program. Under this act, every grant recipient is responsible for assuring HUD that the grant will be carried out in a manner that affirmatively furthers fair housing. CDBG recipients are required to:

1. Examine and attempt to alleviate housing discrimination within their jurisdiction
2. Promote fair housing choice for all persons
3. Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
4. Promote housing that is accessible to and usable by persons with disabilities
5. Comply with the non-discrimination requirements of the Fair Housing Act HUD’s Super Notice of Funding Availability (SuperNOFA) provides funds to ensure that HUD and grantees work towards furthering fair housing and decreasing housing discrimination.

HUD and Fair Lending

Fair lending plays a major role in fair housing. The FHA states that it is unlawful to discriminate in the following ways based on race, color, national origin, religion, sex, familial status, or disability:

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

HUD investigates claims of lending discrimination at no charge. “HUD has conducted a number of studies to determine whether minority homebuyers receive the same treatment and information as whites during the mortgage lending process.” HUD also addresses issues such as subprime lending, predatory lending, and minority homeownership. (Source: <http://portal.hud.gov/hudportal/HUD>)

Community Development Block Grant (CDBG)

Entitlement Grants are awarded to urban communities on a formula basis to support affordable housing and community development activities. The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for low- to moderate-income individuals and families. Bristol Township receives its CDBG allocation directly from HUD. Activities include:

- Acquisition/Rehabilitation
- Homebuyer Assistance
- Homeless Assistance
- Economic Development
- Public Improvements
- Public Services

The township's community and neighborhood development activities are administered through the Bristol Township Community Development Department. Project eligibility is outlined in accordance to HUD program objectives, which are:

1. Development of urban communities including decent housing and a suitable living environment.
2. Expanding economic opportunity, primarily for low- and moderate-income persons.

In order to achieve the program objectives, each qualifying activity must meet one of the three broad National Objectives:

- a) Primarily benefit low- and moderate-income families. More specifically, 51% of the project must benefit families with incomes at or below 80% of the median income.
- b) Aid in the prevention or elimination of slum or blight. Activities considered to aid in the prevention or elimination of slum or blight are activities located within a designated area which: 1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under State or local law; and 2) where there is a substantial number of deteriorating or dilapidated buildings or needed improvements throughout the area.
- c) Meet urgent community development needs. The proposed project must meet needs that have a particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.

Property Tax and Insurance

With the support of the Federal government, many of the older counties across the country have begun to invest in economic and community development programs designed to revitalize their crumbling town core. This type of development demands an ability to achieve fairness in the appraisal process within these neighborhoods. Since the starting point for most bank appraisals is the tax department, discriminatory assessment practices can undermine a homebuyer's ability to secure mortgage financing in an amount equivalent to the property's true market value.

Although the Fair Housing Act specifically prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes, no practical means exists to investigate violations of this kind. One reliable approach is to periodically review the assessment policies and practices of the taxing jurisdiction since their valuations generally comprise the basis for private appraisals.

Property tax assessment discrimination against low-income groups occurs when lower value properties and/or properties in poorer neighborhoods are assessed for property tax purposes at a higher percentage of market value, on average, than other properties in a jurisdiction. Regressive assessments (the tendency to assess lower value properties at a higher percentage of market value than higher value properties) are not uncommon in this country. They result from

political pressures, practical problems in assessment administration, and the use of certain inappropriate appraisal techniques. Assessments tend to remain relatively rigid at a time when property values are rising in middle-income neighborhoods and are declining or remaining at the same level in low-income neighborhoods.

Inequities in property tax assessments are a problem for both lower-income homeowners and low-income tenants. Millions of low-income families own homes. Variation in assessment-to-market value ratios between neighborhoods or between higher- and lower-value properties can make a difference of several hundred dollars or more each year in an individual homeowner's property tax bill. In addition to causing higher property tax bills, discriminatorily high assessment levels can also have an adverse impact upon property values. Buyers are less likely to purchase a property if the property taxes are perceived as too high, thereby making the property less attractive and reducing its market value.

Another common inequity is the assessment of multi-family dwellings at a higher ratio to market value than single-family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live in multi-family rental dwellings. The requirement to pay a higher assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain property within the limits of the property's rent structure, leading to substandard housing conditions.

Most jurisdictions rely heavily on a market value approach to determining value when conducting their property assessment appraisals. Under this approach, an appraiser compares recent sale prices of comparable properties within the area – in addition to site visits and a good deal of expert speculation – in the appraisal process. There are many limitations inherent in market value approaches. Most prominent among them is the cumulative result of decades of discriminatory valuations, especially where the neighborhood is a minority one. Unless some radical re-appraisal process has been conducted within the preceding 10-year period, the present market value approach merely compounds past discrimination.

While the market value approach may operate successfully in some jurisdictions, a substantial percentage of jurisdictions rely primarily on a replacement cost approach in valuing properties. Making determinations of value based on comparable sales is a complex task, which requires considerable exercise of judgment. Assessment departments, which must appraise every property within a jurisdiction, often do not find it feasible to make the detailed individual analysis required to apply the market value approach.

As of 2010, the median real estate taxes paid in Bucks County, Pennsylvania was \$4,721 on a median home value of \$311,600. This was lower than the state average at \$3,765 and the country as a whole at \$3,028 for median real estate taxes paid. The Bucks County Board of Assessment is responsible for examination of all properties in the county subject to assessment, ensuring the assessment values are equitable and uniform. Appraisers search for significant information pertaining to a property and analyze factors that affect value in order to estimate the fair market value of a property.

To find the value of any property in the county, the assessor must first know what similar properties are selling for, what it would cost to replace it, how much it costs to operate it and keep it in repair, and what rent it may earn. An employee from the County Assessor's office visits and measures each home to determine square footage. The employee also notes other information, such as age, type of construction, type of heating and air conditioning, number of floors, and whether the structure has a garage, deck, swimming pool, or other amenities.

The Assessor's Office then considers this information alongside similar properties that have sold in the area, adjusting that sales information to fit each property. For rental or commercial property, an evaluation is made on how much income the property produces, what the operating expenses are, and what kind of investment return can be reasonably expected. With all of this information, the Assessor's Office then determines the market value of the property.

While there were no specific data available for home insurance costs in the County or Bristol Township, home insurance is also an added cost that can affect the cost of housing. (Data Source: The Tax Foundation 2010)

Planning and Zoning

Planning and zoning, new developments, and building and safety regulations in Bristol Township fall under the purview of the Planning Commission and Zoning Hearing Board.

Water and Sewer in Bristol Township

Infrastructure capacity, maintenance, and creation are directly correlated to the economic health of a region. Specifically, access to water and sanitary sewer service are considered by many businesses to be a cornerstone of their operations. The provision of basic utilities like water and sewer services can sometimes add considerable costs to an affordable housing development. Especially when line extensions are required to a new and previously undeveloped site, the burden on the builder can be enough to make the project unattractive. This may also be the case

where there is the need to upgrade and improve service in existing areas. Owners of Low-Income Housing Tax Credit (LIHTC) properties must deduct estimated utility costs when they establish the net rent, they will charge their tenants. These estimates may be much higher than the actual utility costs if the estimates are based on older properties with less efficient construction and appliances. Gross rents are capped as a percentage of the residents' eligible income, so estimating higher utility costs translates into actual reduced cash flows from the net rents, leaving the owner with less money available to service the mortgage and cover operating and maintenance costs. Sewage operations in the township are serviced by Bristol Township Sewer Department. Residents of Bristol Township receive water from two water companies: Lower Bucks County Joint Municipal Authority and AQUA.

Health Care Facilities

Healthcare is particularly important to the many segments of the population that are heavily represented among the very low- and low-income populations in Bristol Township. The elderly, the disabled, and those with special needs are especially vulnerable to health care issues and in need of ready access to medical facilities. The geographic distribution of these population centers in relation to accessible medical and healthcare facilities should be evaluated periodically. While emphasis may be placed on expanding and improving the new and modern facilities located in the more developed portions of the township, attention should continue to be directed to the older established but poorer communities where many of these populations are clustered. The table below lists the prominent hospitals and health centers in Bristol Township.

<i>TABLE: Bristol Township Hospitals and Health Centers</i>	
Healthcare Facility	Address
Lower Bucks Hospital	501 Bath Rd, Bristol, PA 19007
St. Mary Health	4595 New Falls Rd, Levittown, PA 19056
Industrial Health Care Center	1854 Veteran Hwy, Levittown, PA 19056
Women's Health and Maternity Services	501 Bath Rd Suite 202, Bristol, PA 19007

Lower Bucks Hospital is the major medical referral center in Bristol Township. The hospital is located just north of Bristol Pike/Highway 13 and has over 400 physicians and over 1,400 employees.

Fair Housing

Under the Pennsylvania Human Relations Act, it is unlawful to discriminate in all housing transactions on the basis of race, color, religion, sex familial status, ancestry, national origin, age, disability and pregnancy. With few exceptions, anyone who has control over residential property and real estate financing must adhere to these regulations. This includes rental managers, property owners, real estate agents, landlords, banks, developers, builders, insurers, home inspectors, and individual homeowners who are selling or renting property.

Fair Housing Complaints

To register a complaint with the State of Pennsylvania Human Relations Commission, the aggrieved party must officially file the complaint within 180 days after the date of the alleged discrimination. After a complaint is filed, it will be assigned a docket number and will be served on the respondent within 30 days. The respondent is required to answer the complaint within no more than 60 days of the date it was served.

During this process, every effort is made to mediate and resolve the problem through a fact-finding conference and further investigation. Commission staff will conduct the conference and aggrieved party and respondent present evidence and any information that would be helpful.

Complaints can be filed at the Philadelphia Regional Office or online at:

110 North 8th Street

Suite 501

Philadelphia, PA 19107

Phone (215) 560-2496

TTY (215) 560-3599

<https://www.phrc.pa.gov/File-A-Complaint/ComplaintForms/Pages/Housing-and-Commercial-Property.aspx>

A review of the complaints filed in Bristol Township from 2013-2018

Analyzing the complaints filed under fair housing laws is useful in discerning which types of discrimination are most prevalent among Bristol Township households and which protected groups are most commonly affected. However, according to HUD in the most recent 5 years there were only two fair housing complaints filed in the Township. One filed in 2014 was on the basis of race and another filed in 2015 was on the basis of national origin. With only two

complaints filed over the last 5 years, it is difficult to make any assessment.

TABLE: Fair Housing Complaints in Bristol Township, 2013 to 2018			
HUD/FHAP	Filing Date	Location	Basis
FHAP	07/01/2014	Bristol Township	Race
FHAP	04/13/2015	Bristol Township	National Origin
Source: HUD Note: Fair Housing Assistance Program (FHAP)			

A lack of fair housing complaints could signal a need for more fair housing awareness and education of citizens in fair housing and discrimination laws.

NIMBY (Not in My Backyard)

Opposition by local residents to new developments that may be needed by the overall community, but may be considered unattractive for various reasons is often referred to as NIMBY (Not in My Backyard). In regard to fair housing, NIMBY can create a barrier to the development of certain housing types (e.g. units that are affordable to middle- to low-income residents).

Development of affordable housing is widely seen as a fundamental need for the larger community, however local residents may oppose affordable housing projects for fear that it may have adverse effects on the area, including lowering property values, creating added living costs, and in some cases, increasing crime in the area. The result of protecting the interest of the local residents from adverse effects of new affordable housing development projects is that NIMBY becomes another barrier to fair housing, limiting low-income residents another opportunity to find affordable housing.

New HUD Fair Housing Guidance

Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records³

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD's Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy.

While it is impossible to know the precise number of people transitioning from a correctional facility at any one point in time, the ability to access safe, secure, and affordable housing is critical for a formerly incarcerated person's reintegration into society. In the most recent Bureau of Justice Statistics report, “Correctional Populations in the United States, 2016” the Bureau estimated Pennsylvania had 11,700 incarcerated number in prison or local jail. ⁴ In 2014, the Bristol Township Police Department recorded 2,711 arrests. This guidance is intended to eliminate barriers to securing housing for that population, and it is imperative that all jurisdictions make a clear effort to eliminate any discriminatory barriers these individuals may face.

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity⁵

On September 21, 2016 HUD published a final rule entitled “Equal Access in Accordance with an Individual's Gender Identity in CPD programs.” Through this final rule, HUD ensures equal access to individuals in accordance with their gender identity all HUD funded programs. This rule builds upon the 2012 final rule, “Equal Access to Housing in HUD Programs Regardless of Sexual

³ U.S. Department of Housing and Urban Development. “Office of General Counsel: Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions,” April 4, 2016.

https://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHASandCR.pdf

⁴ Bureau of Justice Statistics, “Correctional Populations in the United States, 2016”

<https://www.bjs.gov/content/pub/pdf/cpus16.pdf>

⁵ U.S. Department of Housing and Urban Development. “Equal Access in Accordance with an Individual's Gender Identity in CPD programs.” (2016 Final Rule) & “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.” (2012 Equal Access Rule)

<https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

Orientation or Gender Identity” (2012 Equal Access Rule). This final rule ensures that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

In addition, housing providers that receive HUD funding or have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to HUD program regulations intended to ensure equal access of LGBT persons.

Furthermore, as HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[...] same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions *with* state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions *without* such protections.”⁶

⁶ HUD Office of Policy Development and Research, *An Estimate of Housing Discrimination Against Same-Sex Couples*, June 2013

June 2015 Supreme Court Ruling on Fair Housing

On June 25, 2015 the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring “disparate impact” claims under Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying, or securing financing for housing. The case, *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, centered on the question of whether a policy or action has to be *intentionally* discriminatory, or merely have a discriminatory *effect*, in order to qualify as a valid basis for a discrimination claim under the Act.

Inclusive Communities, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. Inclusive Communities claimed that regardless of intention, the state’s decision to fund tax-credit projects only in minority and poverty-laden neighborhoods resulted in segregation, and thus had a discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled against disparate impact claims that it would essentially “defang” the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

Previously Identified Impediments

One of the primary goals of this document is to review previously identified impediments and any progress made to help guide future actions. Previously, Bristol Township was included in Bucks County's Analysis of Impediments (AI), which was last completed in 2014. The following impediments were identified throughout Bucks County as a whole. Nevertheless, Bucks County and Bristol Township worked closely on various initiatives and projects involving fair housing and affordable housing in the area.

There were 12 impediments identified in the 2014 AI. Eleven of them are Public Sector issues and one is a Private Sector issue. While not all of these will be completely applicable to the Township, they do assist in identifying areas that the Township should address or be aware of to prevent future impediments.

Public Sector

CDBG Funding Allocation Process

Ensuring Fair Housing Compliance: There is a lack of fair housing "filter" to guide the establishment of policies, program guidelines and funding decisions.

Allocation Formula and Fair Housing Compliance: There county utilizes a formula to determine the amount of CDBG funding that will be made available to local units of government. The use of the formula method might not be the best way to ensure that municipalities are fully compliant with their obligations to affirmatively further fair housing.

Actions:

- Analyze each request for housing assistance in terms of geographic location. Proposed projects that expand fair housing choice in non-concentrated census tracts should receive special consideration.
- Continue to map the location of all new program housing projects relative to their location in impacted areas.
- Instead of using a formula, consider an outcome oriented, needs-based approach to allocating CDBG funds to local units of government.
- Evaluate the effectiveness of the 27-member advisory committee in reviewing CDBG project proposals. Provide fair housing training to all members of the advisory committee.
- Revise outreach and application materials for the advisory committee to encourage participation by members of protected classes.

- Publish the AI and CAPER AFFH performance report online.
- Continue to implement affirmative marketing for all housing programs involving HUD funding.

Housing Maintenance and Conditions

There is a need for rehabilitation of substandard housing especially for lower income households.

Actions:

- Affirmatively market the owner-occupied housing rehabilitation program operated through the Bucks County Redevelopment Authority, targeting lower income members of protected classes and geographic areas of racial and ethnic concentration where housing rehabilitation needs are apparent.

Municipal Regulations

A number of municipal zoning ordinances for CDBG applicant communities reviewed during the AI were found to impose dispersal requirements, family relationship requirements or other undue limitations on group homes.

Actions:

- Continue to require each community to attend an interactive fair housing workshop sponsored by the County and including a presentation by the Fair Housing Council of Suburban Philadelphia. Clearly communicate their responsibility to affirmatively further fair housing. Clearly define the standards for affirmatively further fair housing.
- Continue to review municipal land use policies and practices against the standards for AFFH, providing technical land use planning assistance to local units of government as needed to identify and overcome procedural and regulatory barriers to fair housing and affordable housing. Local elected officials, planning commission members and zoning hearing board members should be encouraged to participate in the technical assistance process.
- Require all applicants for HUD funds to officially adopt a resolution committing to AFFH. Require all applicants for HUD funds to submit a signed AFFH resolution and an AFFH certification as part of the application process.
- Award HUD funds only to those local units of government that demonstrate compliance with the standards for Affirmatively Furthering Fair Housing. Continue to provide technical assistance to local units of government that are still working to achieve compliance with the standards for AFFH.

The Urban County's HOME policies

The Urban County has established an underwriting standard applicable to HOME-assisted acquisition-rehab-resale home ownership transactions that limits the amount of HOME assistance to the difference between the appraised value of the property and the buyer's primary mortgage.

Actions:

- In order to maintain maximum flexibility in expanding fair housing choice, the appropriate level of subsidy should continue to be determined on a project-by-project basis during the subsidy layering review process for all home ownership projects. The County should be prepared to provide the full extent of subsidy allowable under HUD's HOME Program for difficult to develop projects, including projects located in non-concentrated areas.

Public Transit Services

Public transit service is largely limited to highly populated areas in lower Bucks County. While this might be understandable from transportation management and fiscal perspectives, it has the effect of limiting fair housing choice. Residents in the northern and eastern area of the county have very limited public transit options.

Actions:

- Continue to work with SEPTA as part of the update to its 2035 long range plan, and with the Bucks County Transportation Management Agency, to explore the feasibility of expanding public transit service in high growth areas of the county, including the creation of ride-to-work transit routes.
- Continue to support the smart growth concept to encourage housing development near transit and transportation services.

Site and Neighborhood Standards

The Urban County's Site and Neighborhood Standards Policy defines areas of concentration of racial and ethnic minorities.

Actions:

- Update the definition of minority and ethnic concentration as new census data is released. Plot the location of concentrated areas on a census tract map of the County. Publish this information on the County's website and distribute it to affordable housing developers as part of the CDBG/HOME application kit.

Planning, Zoning and Land Use

The County's comprehensive plan is one instrument to articulate the County's housing policy and its commitment to affirmatively further fair housing. The County, however, is limited to an advisory role in municipal-level land use decision making.

Actions:

- Continue to provide technical assistance to municipalities through the Bucks County Planning Commission. Specific areas of assistance include fair housing compliance related to land use and zoning, and municipal "fair share" analyses, and implementation of transit-oriented, mixed-use and other development types that foster efficient land use and housing choice.
- Coordinate preparation of countywide housing opportunities plan.

Sale and Rental of Housing

According to the Fair Housing Council of Suburban Philadelphia, housing discrimination remains a problem in Bucks County. Race continues to be one of the primary bases for discrimination complaints.

Actions:

- Continue to fund and support the efforts of local and regional fair housing advocacy organizations in undertaking paired real estate testing, both for rental and sales housing, education, training, and outreach activities.

Board Representation

Members of protected classes appear to be underrepresented on appointed housing boards and commissions, which are heavily populated by elected officials. Representation of members of protected classes on housing and housing-related boards and commissions increase the likelihood that decisions and policies will have the effect of expanding fair housing choice.

Actions:

- Affirmatively recruit minorities, persons with disabilities, women, and LMI persons to serve on publicly appointed housing boards and commissions. Strive to achieve representation equal to at least the relative presence of these groups in the County's population.

Section 8 Vouchers

Section 8 Housing Voucher holders should be encouraged to consider units located in various areas of the County. In order to expand fair housing choice, BCHA should promote the mobility of voucher holders.

Actions:

- Continue to recruit participating landlords in non-concentrated areas of the County and continue to maintain a list of participating landlords that offer apartments in non-concentrated areas of the County and provide this list to voucher holders.
- Within the constraints of the HUD regulations and the funding provided, explore ways to increase the Section 8 payment standard for properties located in non-concentrated areas in order to induce the participation of landlords.
- Maintain records on efforts undertaken to encourage mobility and results achieved.

Limited English Proficiency

In Bucks County, there are four language groups with significant numbers of persons who speak English less than “very well.” Under the Civil Rights Act of 1964, the County must ensure that LEP persons have access to the County’s information, programs and services, including the translation of “vital” documents when the number of LEP persons exceeds certain thresholds.

Actions:

- In order to comply with Title VI of the Civil Rights Act of 1964, the County should conduct the four-factor analysis to determine the extent to which the translation of vital documents is necessary to assist persons with limited English proficiency (LEP).

Private Sector

Mortgage Finance

The ability to secure mortgage financing at competitive rates continues to prove more problematic for minority homebuyers, although overall rates of loan approval have been improving. Beyond its limited First-Time Homebuyer program, the County has no direct role in housing finance, but it can also continue to support efforts to prepare moderate-income households, which are likely to include members of protected classes, to apply for mortgage loans, which supports applications by these households for bank financing.

Actions:

- The County should review its underwriting and administrative guidelines for the First-Time Homebuyer Program to ensure that it nondiscriminatory in terms of household type, available in non-impacted areas of the County, and marketed affirmatively.
- The County should continue funding lending and financial management education programs offered to prospective first-time homebuyers by qualified nonprofit providers.

Current Impediments and Recommendations

The *Analysis of Impediments to Fair Housing Choice* for Bristol Township points to multiple and, in some cases, interrelated areas of need. These impediments to fair housing choice emerged from a thorough review of current policies and practices in the public and private sectors, public input, and a detailed examination of socioeconomic data. Each major impediment is summarized on the following pages, along with a brief overview of the existing conditions surrounding each issue and proposed implementation strategies to address identified impediments.

Impediment 1: There is a lack of fair housing awareness and education in the Township

In the past 5 years, there have been only 2 fair housing complaints in the Township. A lack of fair housing complaints could signal a need for more fair housing awareness and education of citizens in fair housing and discrimination laws. There is little or no information on fair housing and citizen's fair housing rights on the Township's webpage. In the fair housing survey conducted in 2018, nearly 80% of respondents rated their understanding of fair housing laws and housing discrimination as "Poor or Average". In the same survey, approximately 43% of respondents identified fair housing education as "Very Important". There appears to be a disconnect between the Townships' outreach and education available and the public need and appeal for more information on fair housing issues. Recommendations could include exploring fair housing education module(s) or newsletters that could viewed online. The Township can also work with fair housing counseling services in the greater Philadelphia area.

Strategies:

- I. Increase efforts for marketing strategies for all township program activities.
- II. Ensure equal inclusion in housing programs for all protected classes in the township.
- III. Provide technical assistance in affirmative marketing to recipients of township-administered housing development funds.
- IV. Provide fair housing training for township government staff, community stakeholders, housing providers, and financial institutions.

Outcome Measures:

- I. Increased reach of all affirmative marketing efforts.
- II. Increased incidence of reported complaints from people who believe they have experienced or witnessed discrimination.
- III. Program participation that is reflective of the racial and ethnic composition of the city's low-income population.

Impediment 2: Need for fair housing information translated for limited English-speaking

While the population of all races in the Township have remained steady since 2000, the ethnicity of the town is changing. In 2000 Hispanics made up 3.9% of the population in the Township, however that number more than doubled to 9.5% in 2016. As a result, the number of persons who primarily speak Spanish has also increased. According to the ACS, the percent of persons that speak Spanish primarily at home almost doubled from 2010 to 2016. HUD Guidance on promoting fair housing opportunities for LEP residents' states that all vital documents should be translated for any population that represents more than 5% of the eligible population and are more than 50 in number. Currently, only 3.1% of eligible households are limited-English speaking households but that number is increasing, and the Township should begin preparing vital documents in Spanish as well as establishing processes for future efforts.

Strategies:

- I. Increase efforts for marketing strategies for all township program activities and make available in multiple languages.
- II. Update Limited English Proficiency plan to ensure persons with limited English proficiency have meaningful access to all housing programs and activities, whether publicly or privately provided.
- III. Provide fair housing training for township government staff, community stakeholders, housing providers, and financial institutions.
- IV. Deliver multi-language format presentations to community members.

Outcome Measures:

- I. Increased reach of all affirmative marketing efforts in more than one language.
- II. Increased incidence of reported complaints from people who believe they have experienced or witnessed discrimination.
- III. Program participation that is reflective of the racial and ethnic composition of the city's low-income population.

Impediment 3: Access to public transportation is insufficient in Bristol Township

While public transportation is improving with the inclusion of the SEPTA Bus Route and the Trenton Line Regional railway that stops at Bristol Station on 790 Washington St., data from the ACS show that only 3.1% of Township residents used public transportation, while the state as a whole was at 5.6%. While the bus route runs from east to west across the Township from Morrel Park to Oxford Valley Mall, it is not conducive to travel freely within Bristol Township. The Township can explore options for expanding transit access and developing new revenue sources.

Strategies:

- I. Improve the public transportation system by expanding the reach of the bus line and adding in new pick up locations.
- II. Encourage the use of the SEPTA Bus Route for city commute and the train for travel in and out of the township through advertisements and other promotions.
- III. Work with regional and local entities in planning and other studies to improve travel in and around the township.

Outcome Measures:

- I. Expanded routes and/or times of public transportation system.
- II. Increased number of people who use the public transportation system.
- III. Increased promotional materials providing information on the public transportation system.

Impediment 4: There is a lack of new housing development in the Township

Bristol Township's housing stock is considerably older than the housing stock of the county and the state as a whole. In 2016, 88% of the housing stock in the township was built before 1980, while in Bucks County only 61.3% was built before 1980. In the state, 71% of the housing stock was built before 1980. In fact, almost half of the Township's homes were built between 1950 and 1959. While residential construction permits have increased in the past few years, from 2009 to 2015, there was a real deficiency of permits issued.

Strategies:

- I. Identify areas of slum and blight in the area due to the age of homes, and target these areas for revitalization.
- II. Provide funding for housing development programs.
- III. Support pre-purchase counseling programs for potential first-time homebuyers.

Outcome Measures:

- I. Increased number of new affordable housing units developed.
- II. Improved median age of housing in areas of the township that have very old homes.
- III. Increased funding for the development of housing in township.

Impediment 5: There is a shortage of affordable units in a range of sizes

In Bristol Township over 85 percent of the housing units are single-family. There are very few multi-family units available for purchase or for rent. Multi-family units are less expensive per unit to build and can provide a great option for elderly residents downsizing, young employees just

entering the job market, and residents who prioritize access to walkable communities and urban areas over larger units. A variety of housing options can make the Township more attractive to residents and encourage them to stay in the Township throughout all stages of life.

Strategies:

- I. Collaborate with area housing developers who provide additional affordable housing options including mixed use developments, single family and multi-family housing.
- II. Provide information and technical assistance on housing development programs.
- III. Support pre-purchase counseling programs for potential first-time homebuyers.

Outcome Measures:

- I. Increased number of affordable housing units developed.
- II. Increase in funding made available, or other financial equivalents, to affordable housing developers.
- III. Increased activity in the number of multi-unit developments constructed.

Impediment 6: Displacement of residents due to economic pressures

The population of Bristol Township has not experienced growth since 2000, but the cost of housing has increased substantially for both renters and home owners. When residents are cost burdened and the cost of living increases faster than their income, it can push residents out of the community. This can be particularly problematic if the displacement creates a gentrifying effect where low-income and/or non-White residents are being displaced by affluent White residents and thus decrease fair housing choice as fewer affordable housing units remain available.

Strategies:

- I. Encourage mixed-income development in areas with a high concentration of poverty or a single racial group.
- II. Increase access to public infrastructure and public facilities in low wealth, minority concentrated areas.
- III. Encourage development of affordable housing for low- and moderate-income households in high-opportunity neighborhoods.

Outcome Measures:

- I. Significantly lower concentrations of poverty.
- II. Significantly lower concentrations of a single race within a Census tract.
- III. Increased number of affordable housing options in these communities.