THE REINVESTMENT FUND

Strategic Property Code Enforcement and its Impacts on Surrounding Markets

Prepared by
The Reinvestment Fund, Policy Solutions
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STRATEGIC PROPERTY CODE ENFORCEMENT AND ITS IMPACTS ON SURROUNDING MARKETS

Introduction

On October 27, 2010 Pennsylvania Governor Corbett signed the Neighborhood Blight Reclamation and Revitalization Act (Act 90)[1]. Act 90 provides that "A lien may be placed against the assets of an owner of real property that is in serious violation of a code or is regarded as a public nuisance." This means that municipal governments enforcing their building codes could attach fines and penalties to the personal assets of owners of blighting properties. In Philadelphia, the Department of Licenses and Inspections (L&I) formulated an initiative for strategic, targeted enforcement against vacant properties using the newly created powers under Act 90 and of the city's 'doors and windows' ordinance. The 'doors and windows' ordinance enables L&I to fine owners of properties on low vacancy blocks with an opening that is not covered with a functional door or window $300 per day, per opening. The combination of Act 90 and the 'doors and windows' ordinance served as a powerful new tool to remediate blighting properties in Philadelphia.

In addition to targeting lower vacancy areas for this program, L&I's vacant property strategy specifically targets owners of multiple blighting properties who are likely to comply with 'doors and windows' citations and offers an opportunity to address blighting properties at scale. To start, L&I created a database of 25,100 properties it believed were likely vacant. A team of researchers then cross referenced information from a variety of city (and proprietary) databases to determine ownership of these properties—a previous hurdle to enforcement. From this research a profile emerged of owners who had an incentive to address numerous blighting properties: owners of several vacant properties who were less than five years behind on real estate taxes (referred to as "large owners"). These properties were mapped and supplied to L&I inspectors for a prioritized inspection. The final lever of enforcement is a dedicated monthly Municipal Court date in which L&I can streamline unresolved cases into the legal process for either a settlement with, or a judgment against, the property owner.

The resolution of blighting properties has long been an issue in Philadelphia. In economic terms blighting properties have a negative effect on the market value of other surrounding properties.[2] Curing blighting properties raises the value of nearby properties and increases a variety of the city's revenue streams, such as real estate transfer tax, property tax, and building permit fees. Therefore, concentrated enforcement like that undertaken by L&I could result in observable positive changes in the trajectory of markets that have experienced concentrated enforcement compared to similar markets that have not.

The Reinvestment Fund Policy Solutions (TRF) team has worked since 2011 with the William Penn Foundation-funded Data Collaborative, a group of nonprofit housing and community development proponents (Housing Alliance of Pennsylvania, Philadelphia Association of Community Development Corporations, Regional Housing Legal Services and LISC Philadelphia), to evaluate outcomes and impacts

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[1] *See* http://www.legis.state.pa.us/cfdocs/legis/li/uconsCheck.cfm?yr=2010&sessInd=0&act=90 (accessed 3/17/2014).

[2] *See e.g.* Immergluck, Dan and G. Smith. *There Goes the Neighborhood: The Effect of Single-Family Mortgage Foreclosure on Property Values.* Woodstock Institute. (Chicago, 2005); Mikelbank, Brian. *Spatial Analysis of the Impact of Vacant, Abandoned and Foreclosed Properties.* Federal Reserve Bank of Cleveland. (Cleveland, November 2008).

from policy changes they advocated. One notable previous Data Collaborative accomplishment was a report titled "*What if Pennsylvania Had Not Had HEMAP?",* which demonstrated the financial impact of Pennsylvania's Homeowners' Emergency Mortgage Assistance Program (HEMAP). This study was used to support dedication by the Pennsylvania Attorney General of more than $60 million of Pennsylvania's share of the funds from the national settlement agreement with mortgage servicers to re-capitalize HEMAP.

The Data Collaborative members were actively involved in efforts to enact Act 90. They asked TRF to evaluate whether concentrated enforcement of code violations utilizing Act 90 resulted in measureable changes in neighborhoods with concentrated enforcement compared to neighborhoods without these particular enforcement mechanisms. Stated differently, were there positive, observable changes in Philadelphia neighborhoods attributable to the changes in law and practice the Data Collaborative members advocated? In the following report, we detail that Neighborhood Enforcement Clusters (NECs)—areas within which L&I concentrated its code enforcement efforts—outperform comparable areas without concentrated code enforcement. Performance is measured in residential sale price trajectory and rates of tax delinquency. This report establishes that L&I's enforcement resulted in numerous financial benefits to the city, including increased real estate transfer tax revenue, increased tax receipts from higher rates of tax compliance and higher sale prices, along with fees and penalties coming back to the city that underwrite the cost of the enforcement effort.

State of the Research on the Impacts of Code Enforcement on Neighborhoods

The concept that a property without working windows, doors or both can have negative effects on the surrounding neighborhood dates back at least to the "Broken Windows Theory" popularized in the 1980s.[3] More recent studies have shown that housing abandonment resulting from foreclosure also suppresses values of nearby homes;[4] in economic terms, blighting and abandoned properties result in a negative externality on neighbors' properties. Practitioners in the fields of neighborhood development and revitalization have therefore theorized that removing the negative externality of blight through enforcement of municipal building codes can unlock the value of surrounding properties. While this premise is sound in economic theory, little systematic data has been collected and analyzed to either confirm or refute this theory, or to gauge the size of the effect.

Researchers have studied city code enforcement activities both as a singular intervention strategy and as one activity among many in a concentrated, targeted neighborhood stabilization effort. There is some evidence that code enforcement results in remediation of individual properties that could be a blighting influence on a neighborhood,[5] although that study did not determine the effect that removing blighting influences had on surrounding properties. A study of a revitalization program in Richmond, Virginia, that

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[3] Wilson, James Q. and George L Kelling, "Broken Windows: The police and neighborhood safety." *The Atlantic* (March, 1982).

[4] *See e.g.* Immergluck, Dan and Geoff Smith. *There Goes the Neighborhood: The Effect of Single-Family Mortgage Foreclosures on Property Values.* Woodstock Institute. (Chicago, 2005) (finding that "each conventional foreclosure within an eighth of a mile (essentially a city block) of a single-family home results in a 0.9 percent decline in value").

[5] *See e.g.* Ramsey, Sarah H. and Fredrick Zolna. *A Piece in the Puzzle of Providing Adequate Housing: Court Effectiveness in Code Enforcement.* Fordham Urban Law Journal. 18: (4) 605-654 (1991) (finding that of a random sample of 100 Syracuse code violation cases, 63 violations either self-corrected or complied with a court-imposed solution to the violation); Kinning, Robin Powers. *Selective Housing Code Enforcement and Low-Income Housing Policy: Minneapolis Case Study*. Fordham Urban Law Journal. 21: 159-197 (1994).

included concentrated code enforcement as part of a comprehensive neighborhood revitalization effort ("Neighborhoods in Bloom") found that home sale prices improved closer to concentrated stabilization activities.[6] That study utilized a statistical model that allowed for a quantitative comparison of areas that received subsidy to those areas that did not. Subsidy in this instance included Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME) funds. The study found that "sales price in the target areas increased 9.9 percent per year faster than prices in the city overall."[7] While an important finding, this research did not attempt to separate the effect of code enforcement from other Neighborhoods in Bloom program activities. There remains little evidence of the sole effect of concentrated code enforcement in the literature.

Methodology

TRF received a database from L&I containing a number of indicators about properties that it believed to be vacant. The database included the property address, whether the property was owned by a government agency, whether the property was owned by an L&I-defined "large owner," whether the property was cited for a code violation, and whether the property was subject to a Municipal Court hearing. The locations of the properties were then geocoded and mapped. NECs were defined as census block groups that (1) had at least five citations and (2) where at least 50% of identified vacant properties had been cited.

TRF then identified a control group of block groups (called "comps") with similar residential real estate market characteristics to the NECs before L&I began making data-based targeting decisions to cite properties under their vacant property campaign. Comps had similar:

- Residential sale price before the intervention
- Percentage change in sale price (i.e. the trajectory of sale price)
- Percentage of owner occupancy
- Number of households
- HUD-determined foreclosure risk score
- Percentage of properties in foreclosure

Comps were also defined in terms of their distance from the NEC. Areas that were closer, but not adjacent, to NECs were preferred over areas that were farther away. We incorporated this distance component to minimize the potential contagion effect across block group boundaries from the enforcement activity.

TRF then scored each NEC from A to D against the three comps that we determined to be most comparable to the NEC. TRF scored the NECs on two indicators of real estate market health: sale price change from 2008/2009 to 2011/2012 (using data from Philadelphia's Board of Revision of Taxes, or BRT) and change in the percentage of tax delinquent properties (Office of Property Assessment). NECs that outperformed all three comps received an A grade, those that outperformed two of three received

[6] Accordino, John, George Galster and Peter Tatian. *The Impacts of Targeted Public and Nonprofit Investment on Neighborhood Development: Research Based on Richmond, Virginia's Neighborhoods in Bloom Program.* Community Affairs Office of The Federal Reserve Bank of Richmond. (Richmond, July 2005).
[7] Id. at 37.

a B, one a C, and if all comps outperformed the NEC, it received a D. If data was not available for some comps, the NEC was graded only against the comps with sufficient data.

Example NEC and Top Three Comps

Map 1: Example NEC and Top Three Comps

As an example of the method, Map 1 shows census block group 421010197004, a NEC located in the Hunting Park section of Philadelphia, and its three most comparable block groups throughout the city.

The most comparable block group is in Nicetown, with the second and third most comparable block groups being in Allegheny West. These comps are located between one mile and two miles from the NEC. All three comps are similar to the NEC on median sale price in 2008/2009. All four block groups have the highest possible foreclosure risk score. In TRF's most recent Market Value Analysis, all four block groups were also categorized as "distressed," another indicator that these neighborhoods had similar residential real estate markets when L&I began this enforcement initiative.

Block Group	Distance (meters)	Distance (feet)	% Owner Occupancy	Household Count	Foreclosure Risk Score	Median Sale Price 2008/2009	Change in Median Sale Price
421010197004	0	0	47.4%	306	10	$16,100	24.2%
421010202004	1,558	5,112	43.5%	276	10	$11,000	81.8%
421010171002	2,552	8,373	69.3%	345	10	$16,250	-1.2%
421010173005	1,676	5,499	61.5%	195	10	$15,090	5.4%

Table 1: Sample NEC and Top Three Comps

Summary of Activities of the L&I Program

Of the 25,100 likely vacant properties across Philadelphia identified by L&I, 7,533 (30%) had been cited as of May of 2013 (when TRF received the database). Of those, 3,612 vacant properties were within areas defined as NECs (about 14% of all vacant properties) and 2,600 of the vacant properties within NECs had been cited (72%). Philadelphia's Fifth Council District is home to the greatest number of vacant properties—4,529—while the Tenth Council District contains the fewest—395. Rates of citation vary between council districts from about 41% in the Second Council District to about 19% in the Tenth Council District; seven of the ten districts have between 20% and 40% of likely vacant properties cited for some building code violation.

L&I identified 1,072 of the 25,100 likely vacant properties as being owned by a "large owner," and therefore targeted those properties for enforcement. All 1,072 had received at least one citation and 479 (45%) of those properties had complied with the citation when we examined the database. In 144 cases, the property had a scheduled Municipal Court date and 115 (80%) of the properties with a Municipal Court date came into compliance compared to 40% compliance for properties that had not yet gone to Municipal Court.

Performance of NECs

Average Performance

Before the L&I intervention, both the NECs and comps had average sale prices of approximately $72,000. After the intervention, the comps increased slightly, about $1,200 or 1.6%. Over that same time period, the NECs increased $23,000, or about 32%. Comps saw a 4.1% increase in the rate of tax delinquency from 27% to 28.1%, while tax delinquency in the NECs decreased by 1.1%.

	Mean Sale Price			Mean Rate of Tax Delinquency		
	2008/2009	2011/2012	Change	2008/2009	2011/2012	Change
NECs	$72,526	$95,651	31.9%	36.1%	35.7%	-1.1%
Comps	$72,239	$73,411	1.6%	27.0%	28.1%	4.1%

Table 2: Change in Mean Sale Price and Mean Rate of Tax Delinquency in NECs Compared to Comps

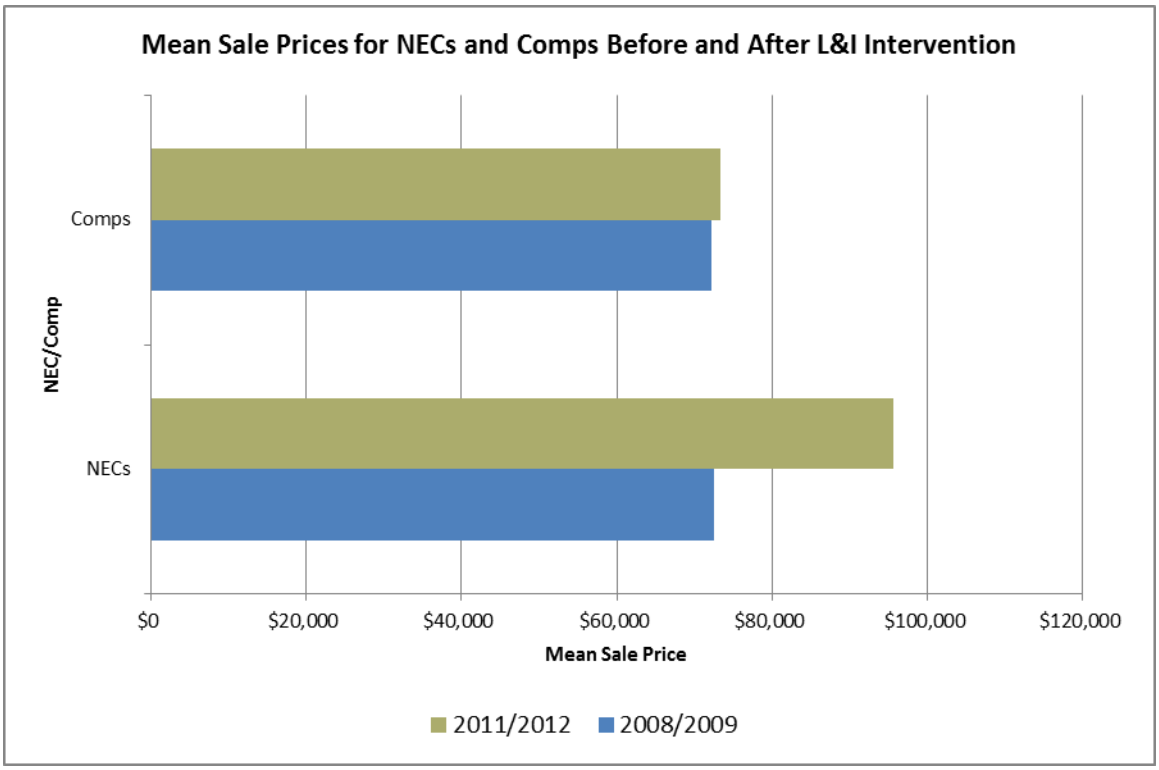


Figure 1: Change in Mean Sale Price in NECs compared to Comps

Performance of NECs Against Comps

Fifty-two NECs (approximately 39%) beat all their comps in median sale price change from 2008/2009 to 2011/2012. The remaining NECs were almost evenly distributed among grades B through D. Almost four out of every five NECs outperformed at least one of their comparable neighborhoods.

	Performance by Median Sale Price Change			
	A	B	C	D
# of NECs	52	27	27	28
% of NECs	38.8%	20.1%	20.1%	20.9%

Table 3: NECs Scored Against Their Comps in Sale Price Change

Just under 40% of NECs outperformed all their comps in change in rate of tax delinquency. More than 75% of NECs beat at least one comp; 22% of NECs did not beat any comps.

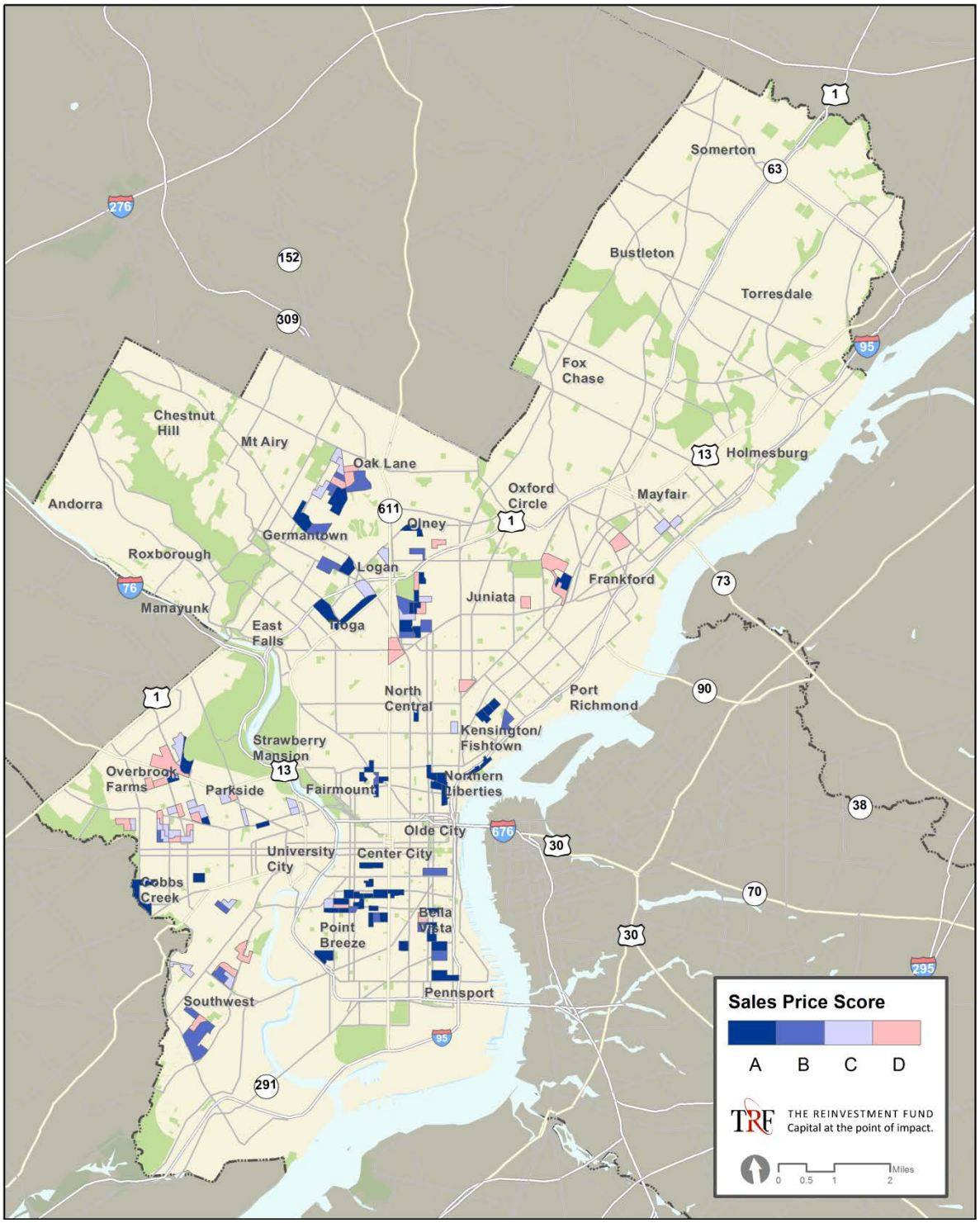
	Performance by Change in Tax Delinquency			
	A	B	C	D
# of NECs	53	32	19	30
% of NECs	39.6%	23.9%	14.2%	22.4%

Table 4: NECs Scored Against Their Comps in Tax Delinquency Change

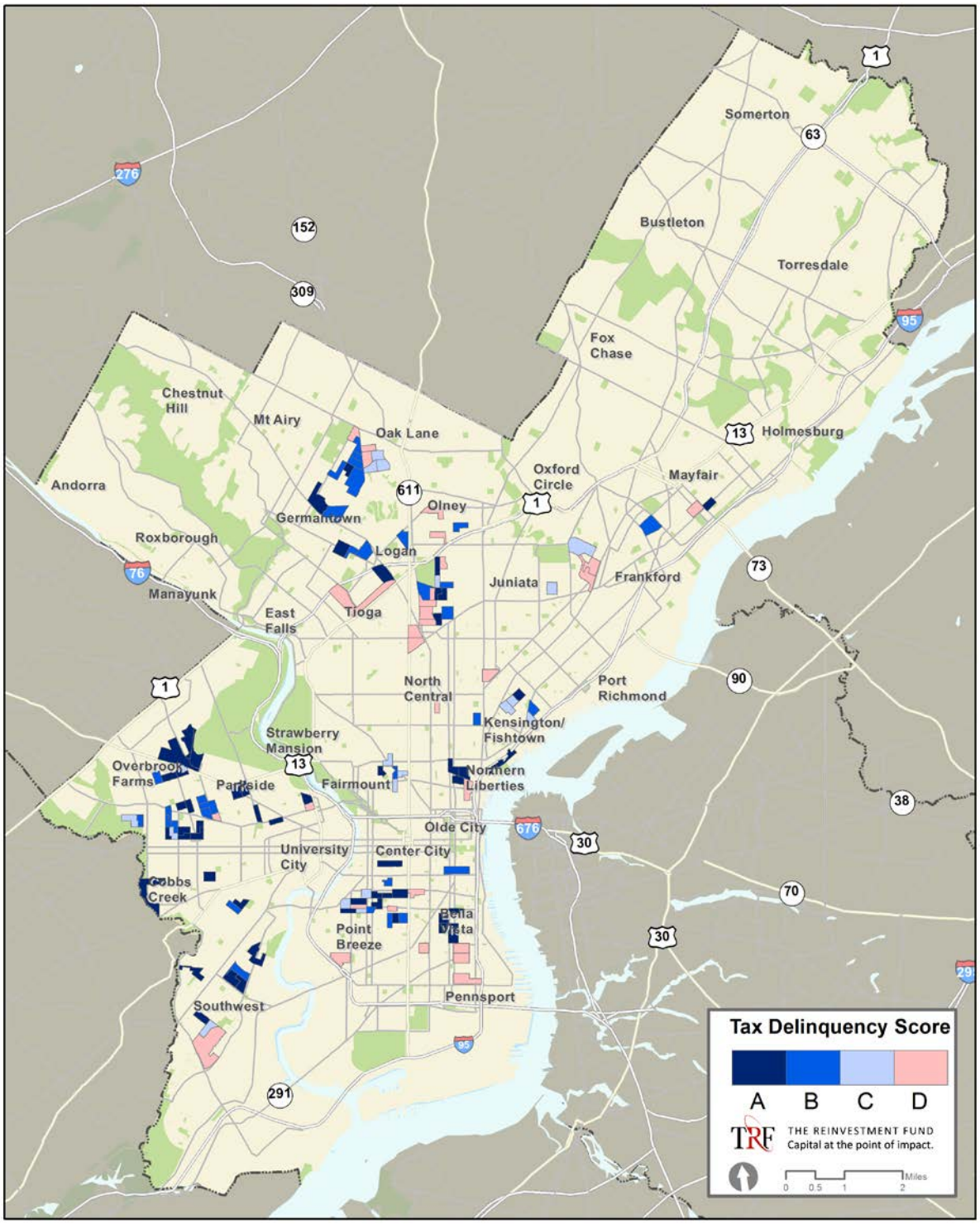
Geography of Performance

Examining the performance of NECs spatially can provide a view into whether the performance of NECs is consistent across parts of Philadelphia or whether performance is influenced by local factors. For example, NECs with A-level performance in sale price change are found in most parts of the city, but are concentrated in Point Breeze, Graduate Hospital, Pennsport, Northern Liberties, Fairmount, Hunting Park, Germantown and along North Broad Street. NECs with a D grade, although also found in a variety of places, are more frequently located in Overbrook Farms and Frankford. [See Map 2]

NECs in Overbrook Farms, West Philadelphia, Cobbs Creek, and Bella Vista received A grades for change in rates of tax delinquency. Several NECs in Pennsport were D performers, as well as a cluster of NECs in Frankford and Hunting Park. [See Map 3]



Map 2: Geography of NEC Performance by Sale Price Change



Map 3: Geography of NEC Performance by Tax Delinquency Change

Financial Impact Produced by L&I Enforcement Activity

In a November 2010 report detailing the cost of blight to Philadelphia's residential real estate market, Econsult Corporation created a model for estimating the effects of nearby vacant parcels on property values.[8] By adapting that model, we can estimate the extent of property value retained (or unlocked) throughout Philadelphia by L&I enforcement, the value realized through sales in the past two years, and the continuing cost of unremediated publicly owned vacant properties. Comparing residential real estate market sales for 2011/2012 from BRT to the location of remediated vacant properties in the L&I database, we estimate that ***L&I enforcement activity unlocked $78 million in realized sale price that would not have occurred had nearby properties remained blighted. That figure represents a direct increase in city real estate transfer tax revenue of $2.34 million.***[9]

Conclusion

L&I's Act 90 enforcement activities have had a measureable impact on neighborhoods that experienced concentrated enforcement relative to similar neighborhoods that did not. As a whole, sale price improved in these neighborhoods by roughly 30% from 2008/2009 to 2011/2012 compared to 1.6% in similar neighborhoods. Comparable neighborhoods' rates of tax delinquency increased, while targeted neighborhoods' rates of tax delinquency decreased. When compared directly, two out of five of the neighborhoods in which L&I intervened outperformed all of their comparable neighborhoods on change in sales price and tax delinquency, and four out of five beat at least one comparable neighborhood.

These activities return value to neighborhoods by removing blighting influences and to the city through fines, permit fees, increased real estate transfer taxes and increased property tax receipts. Based on the enhanced value of homes sold associated with blight removal, using the city's transfer tax rate, there was an additional estimated transfer tax revenue of $2.34 million more over a two year period. L&I estimates $1.1 million dollars returned in permits, licenses and certificates, and in fines and default judgments assessed in Municipal Court. Research has also connected blight to a range of social problems, such as crime, poor health outcomes, deteriorating conditions of neighboring properties, and decline in various measures of social cohesion.[10] Therefore, L&I's enforcement activities likely benefitted residents of the NECs in a variety of ways in addition to those examined in this report.

The neighborhoods targeted for concentrated L&I enforcement were generally places in which blighted properties do not yet predominate because doors and windows violations are limited to blocks with at least 80% occupancy. Therefore, ***although we found that L&I enforcement unlocked real estate market value in the NECs, we cannot estimate what the effect of similar enforcement activity would be in areas with a greater extent of blight.***

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[8] *See* Appendix B, Econsult Corporation, Penn Institute for Urban Research and May 8 Consulting. Vacant Land Management in Philadelphia: The Costs of the Current System and the Benefits of Reform. (Philadelphia, November 2010).

[9] In the same time period, publicly owned vacant land cost $22 million in lost sales value of nearby properties, a transfer tax revenue loss of $660,000.

[10] *See e.g.* Helmholdt, Nicholas Gerald. *Neighborhood Effects of Physical Interventions in Abandoned Housing*. Cornell University. (Ithaca, August 2009); Schilling, Joseph. *Code Enforcement and Community Stabilization: The Forgotten First Responders to Vacant and Foreclosed Homes.* Available at: https://www.onecpd.info/resources/documents/CodeEnforcementandCommunityStabilization.pdf (accessed 3/17/2014).

Limitations

The methods employed in this study are designed to control for relevant market influences on sale price and tax delinquency so that the impact of L&I's effort could be discerned. This method is not flawless and is subject to confounding influences that are not controlled through our matching of market characteristics. Stated differently, although we controlled for a set of market characteristics there may be other indicators that differentiate NECs and comps and those other characteristics, left uncontrolled, might allow the L&I effort to emerge as the influential factor.

The second limitation of the work involves the purposeful selection of areas by L&I that were undergoing transition (i.e., gentrification or revitalization). In order to assess the impact of this potential selection bias on the conclusions, TRF excluded certain NECs in areas reputed to be undergoing gentrification (e.g., Point Breeze, Northern Liberties) and ran the comparisons again. Differences between NECs and comps did reduce slightly but not so considerably as to raise a concern that this was a substantial bias in our conclusions.

Lastly, the L&I effort was focused in areas that were not the most extremely blighted parts of Philadelphia. This was by design because of the restrictions in Philadelphia's "doors and windows" ordinance. Therefore it would be incorrect to conclude that targeted code enforcement like that which L&I conducted in these communities in Philadelphia would be equally impactful in areas with greater concentrations of blighted properties.

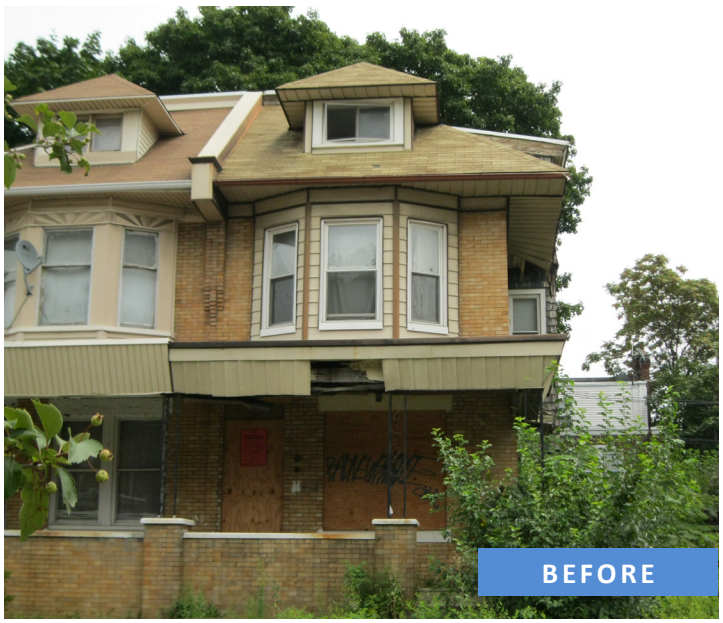
In short, there are certain limitations to the conclusions that we have drawn, but upon review, we do not believe that they negate or undermine our conclusions.

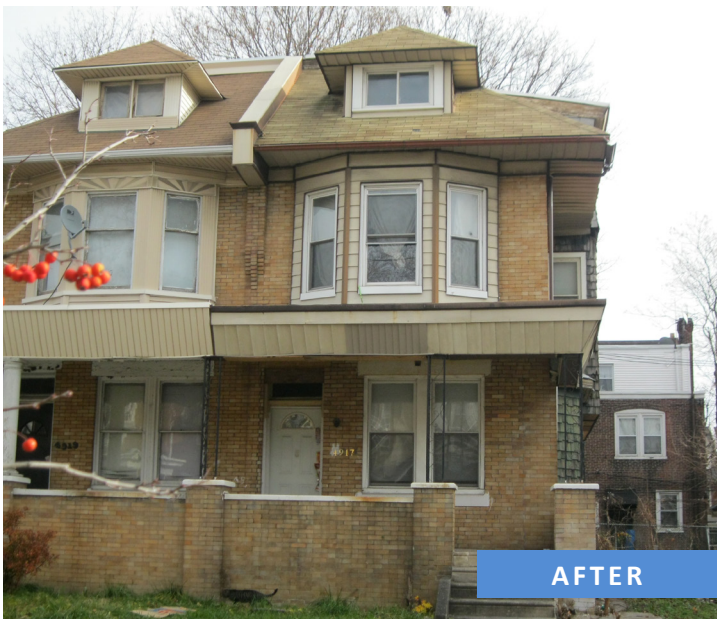
SUPPORT & PARTNERS

This work was supported by The William Penn Foundation. Partners in this Data Collaborative effort include: Housing Alliance of Pennsylvania, Philadelphia Association of Community Development Corporations, Regional Housing Legal Services and LISC Philadelphia.

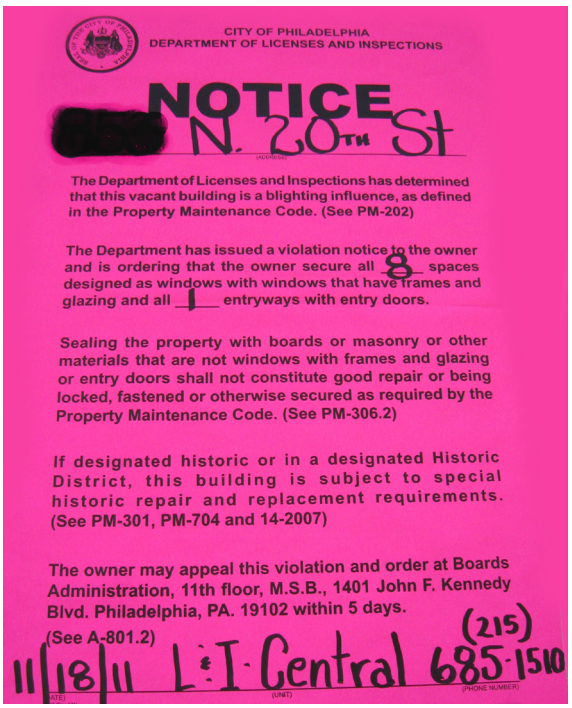
Program data, comments on this analysis and photos in this document were supplied by the City of Philadelphia's Department of Licenses and Inspections.

EXAMPLES OF CITED PROPERTIES





EXAMPLE OF CITATION NOTICE



CITY OF PHILADELPHIA
DEPARTMENT OF LICENSES AND INSPECTIONS

NOTICE

[redacted] N. 20TH St
(ADDRESS)

The Department of Licenses and Inspections has determined that this vacant building is a blighting influence, as defined in the Property Maintenance Code. (See PM-202)

The Department has issued a violation notice to the owner and is ordering that the owner secure all 8 spaces designed as windows with windows that have frames and glazing and all 1 entryways with entry doors.

Sealing the property with boards or masonry or other materials that are not windows with frames and glazing or entry doors shall not constitute good repair or being locked, fastened or otherwise secured as required by the Property Maintenance Code. (See PM-306.2)

If designated historic or in a designated Historic District, this building is subject to special historic repair and replacement requirements. (See PM-301, PM-704 and 14-2007)

The owner may appeal this violation and order at Boards Administration, 11th floor, M.S.B., 1401 John F. Kennedy Blvd. Philadelphia, PA. 19102 within 5 days. (See A-801.2)

11/18/11 L&I Central (215) 685-1510
(DATE) (UNIT) (PHONE NUMBER)

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The Reinvestment Fund

May 2014

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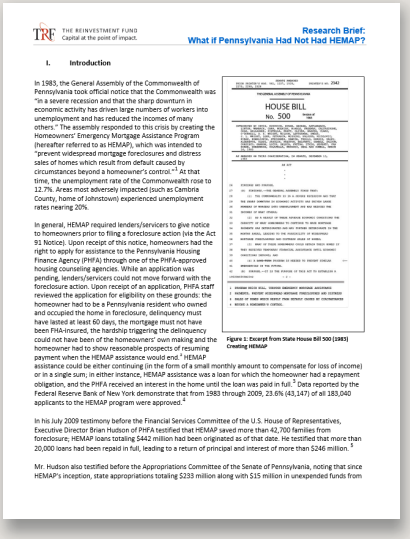
http://www.trfund.com/impact/research-publications/

What if Pennsylvania Had Not Had HEMAP?



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Research Brief:
What if Pennsylvania Had Not Had HEMAP?

I. Introduction

In 1983, the General Assembly of the Commonwealth of Pennsylvania took official notice that the Commonwealth was "in a severe recession and that the sharp downturn in economic activity has driven large numbers of workers into unemployment and has reduced the incomes of many others." The assembly responded to this crisis by creating the Homeowners' Emergency Mortgage Assistance Program (hereafter referred to as HEMAP), which was intended to "prevent widespread mortgage foreclosures and distress sales of homes which result from default caused by circumstances beyond a homeowner's control."[1] At that time, the unemployment rate of the Commonwealth rose to 12.7%. Areas most adversely impacted (such as Cambria County, home of Johnstown) experienced unemployment rates nearing 20%.

In general, HEMAP required lenders/servicers to give notice to homeowners prior to filing a foreclosure action (via the Act 91 Notice). Upon receipt of this notice, homeowners had the right to apply for assistance to the Pennsylvania Housing Finance Agency (PHFA) through one of the PHFA-approved housing counseling agencies. While an application was pending, lenders/servicers could not move forward with the foreclosure action. Upon receipt of an application, PHFA staff reviewed the application for eligibility on these grounds: the homeowner had to be a Pennsylvania resident who owned and occupied the home in foreclosure, delinquency must have lasted at least 60 days, the mortgage must not have been FHA-insured, the hardship triggering the delinquency could not have been of the homeowners' own making and the homeowner had to show reasonable prospects of resuming payment when the HEMAP assistance would end.[2] HEMAP assistance could be either continuing (in the form of a small monthly amount to compensate for loss of income) or in a single sum, in either instance, HEMAP assistance was a loan for which the homeowner had a repayment obligation, and the PHFA received an interest in the home until the loan was paid in full.[3] Data reported by the Federal Reserve Bank of New York demonstrate that from 1983 through 2009, 23.6% (43,147) of all 183,040 applicants to the HEMAP program were approved.[4]

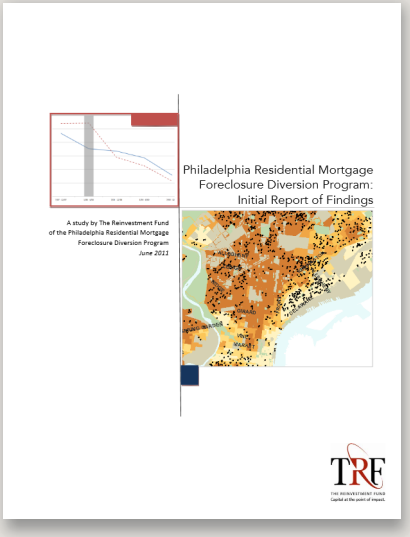
In his July 2009 testimony before the Financial Services Committee of the U.S. House of Representatives, Executive Director Brian Hudson of PHFA testified that HEMAP saved more than 42,700 families from foreclosure; HEMAP loans totaling $442 million had been originated as of that date. He testified that more than 20,000 loans had been repaid in full, leading to a return of principal and interest of more than $246 million.[5]

Mr. Hudson also testified before the Appropriations Committee of the Senate of Pennsylvania, noting that since HEMAP's inception, state appropriations totaling $233 million along with $15 million in unexpended funds from

HOUSE BILL
No. 500

Figure 1: Excerpt from State House Bill 500 (1983) Creating HEMAP

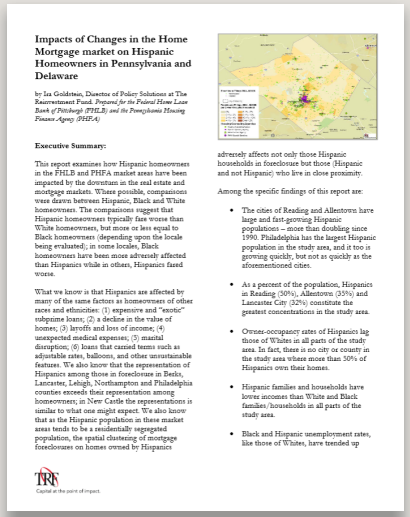
Philadelphia Residential Mortgage Foreclosure Diversion Program: Initial Report of Findings



Philadelphia Residential Mortgage Foreclosure Diversion Program: Initial Report of Findings

A study by The Reinvestment Fund of the Philadelphia Residential Mortgage Foreclosure Diversion Program
June 2011

Impacts of Changes in the Home Mortgage market on Hispanic Homeowners in Pennsylvania and Delaware



Impacts of Changes in the Home Mortgage market on Hispanic Homeowners in Pennsylvania and Delaware

by Ira Goldstein, Director of Policy Solutions at The Reinvestment Fund. *Prepared for the Federal Home Loan Bank of Pittsburgh (FHLB) and the Pennsylvania Housing Finance Agency (PHFA)*

Executive Summary:

This report examines how Hispanic homeowners in the FHLB and PHFA market areas have been impacted by the downturn in the real estate and mortgage markets. Where possible, comparisons were drawn between Hispanic, Black and White homeowners. The comparisons suggest that Hispanic homeowners typically fare worse than White homeowners, but more or less equal to Black homeowners (depending upon the locale being evaluated); in some locales, Black homeowners have been more adversely affected than Hispanics while in others, Hispanics fared worse.

What we know is that Hispanics are affected by many of the same factors as homeowners of other races and ethnicities: (1) expensive and "exotic" subprime loans; (2) a decline in the value of homes; (3) layoffs and loss of income; (4) unexpected medical expenses; (5) marital disruption; (6) loans that carried terms such as adjustable rates, balloons, and other unsustainable features. We also know that the representation of Hispanics among those in foreclosure in Berks, Lancaster, Lehigh, Northampton and Philadelphia counties exceeds their representation among homeowners; in New Castle the representations is similar to what one might expect. We also know that as the Hispanic population in these market areas tends to be a residentially segregated population, the spatial clustering of mortgage foreclosures on homes owned by Hispanics adversely affects not only those Hispanic households in foreclosure but those (Hispanic and not Hispanic) who live in close proximity.

Among the specific findings of this report are:

- The cities of Reading and Allentown have large and fast-growing Hispanic populations – more than doubling since 1990. Philadelphia has the largest Hispanic population in the study area, and it too is growing quickly, but not as quickly as the aforementioned cities.
- As a percent of the population, Hispanics in Reading (30%), Allentown (35%) and Lancaster City (32%) constitute the greatest concentrations in the study area.
- Owner-occupancy rates of Hispanics lag those of Whites in all parts of the study area. In fact, there is no city or county in the study area where more than 50% of Hispanics own their homes.
- Hispanic families and households have lower incomes than White and Black families/households in all parts of the study area.
- Black and Hispanic unemployment rates, like those of Whites, have trended up

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Searching for Markets: The Geography of Inequitable Access to Healthy & Affordable Food in the United States

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