



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Waterbury
June 2020
MMI #1014-77

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INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the City of Waterbury's efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing.

What is an AI?

The AI is a review of impediments to fair housing choice in the public and private sector. The AI involves:

- (a) A comprehensive review of the City's laws, regulations, and administrative policies, procedures, and practices;
- (b) An assessment of how those laws, etc., affect the location, availability, and accessibility of housing; and
- (c) An assessment of conditions, both public and private, affective of fair housing choice.

What are Impediments to Fair Housing Choice?

- (a) Any actions, omissions, or decisions taken because of one of the protected classes of race, color, religion, sex, disability, familial status, or national origin that restrict the housing choices of the availability of housing choices; or
- (b) Any actions, omissions, or decisions that have the effect of restricting housing choices of the availability of choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

Waterbury's most recent update to the AI was completed in 2013. The 2013 AI identified fourteen housing impediments as specified below:

- Some of the policy documents used by the City of Waterbury could be improved from a fair housing perspective.
- Additional education and outreach are needed regarding rights and responsibilities under the Fair Housing Act and state and local laws.
- Landlords may not be receiving adequate fair housing information.
- The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in nonimpacted neighborhoods of opportunity.
- Poor property maintenance and abandonment in Waterbury limit the availability of decent and safe units within the City's affordable housing stock.
- The number of City residents with limited English proficiency has grown significantly in recent decades, and this population may need assistance to access City programs and services.
- The City of Waterbury does not have a complete fair housing profile because of a lack of local testing.
- The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities.

- Some of the policy documents used by the Housing Authority of the City of Waterbury could be improved from a fair housing perspective.
- Persons with limited English proficiency are experiencing difficulty accessing housing.
- The Housing Authority may be unnecessarily funding Section 8 vouchers at 120% of the area Fair Market Rent.
- Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.
- Mortgage lending data from 2009 to 2011 suggests that some racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.
- Local for-sale and rental housing advertisements include language that may discourage certain members of protected classes from applying.

This update assesses progress made on implementing strategies since 2013 and re-analyzes demographic and market changes to determine current impediments to fair housing.

Summary of Impediments

Note that a complete list can be found in the Identification of Impediments to Fair Housing Choice section (page 18).

- There is a lack of understanding regarding rights and responsibilities under the Fair Housing Act, and state and local laws.
- Landlords may not be receiving adequate fair housing information.
- The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in nonimpacted neighborhoods of opportunity.
- Poor property maintenance and abandonment in Waterbury limit the availability of decent and safe units within the City's affordable housing stock.
- The residents with limited English proficiency may need assistance to access City programs, services, and policy documents.
- The limited the housing opportunities available to persons with disabilities.
- Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.
- Some racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.
- Local for-sale and rental housing advertisements include language that may discourage certain members of the protected classes from applying.

BACKGROUND DATA

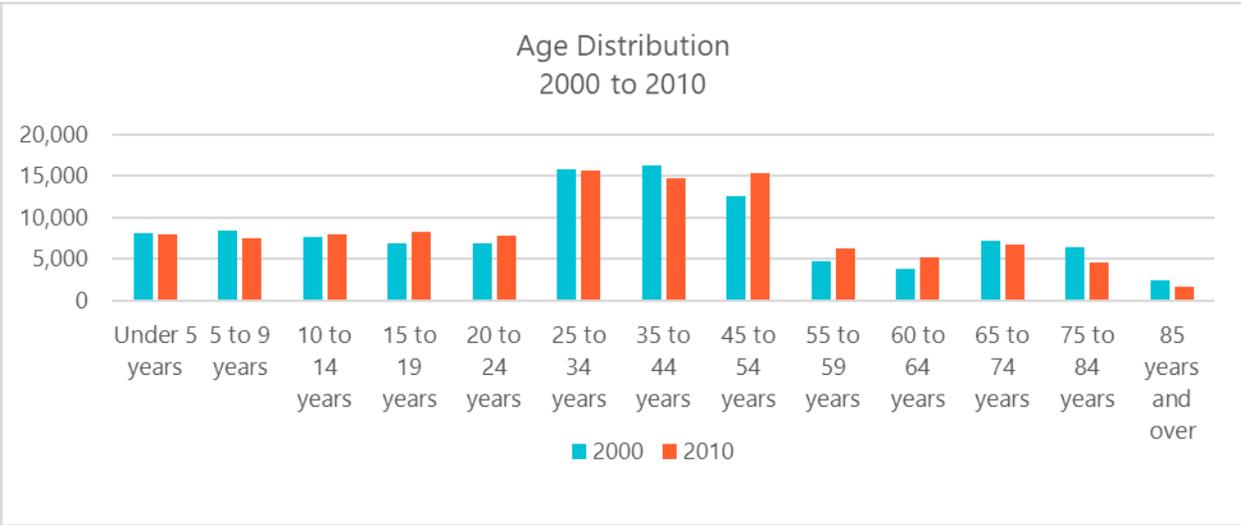
Demographic Trends and Characteristics

A comparison of a variety of social, economic, and demographic indicators from the 2010 Census, 2011-2015 American Community Survey (ACS,) and Connecticut Department of Labor (CTDOL) illustrates that Waterbury has experienced a number of important shifts and changes over the past decade.

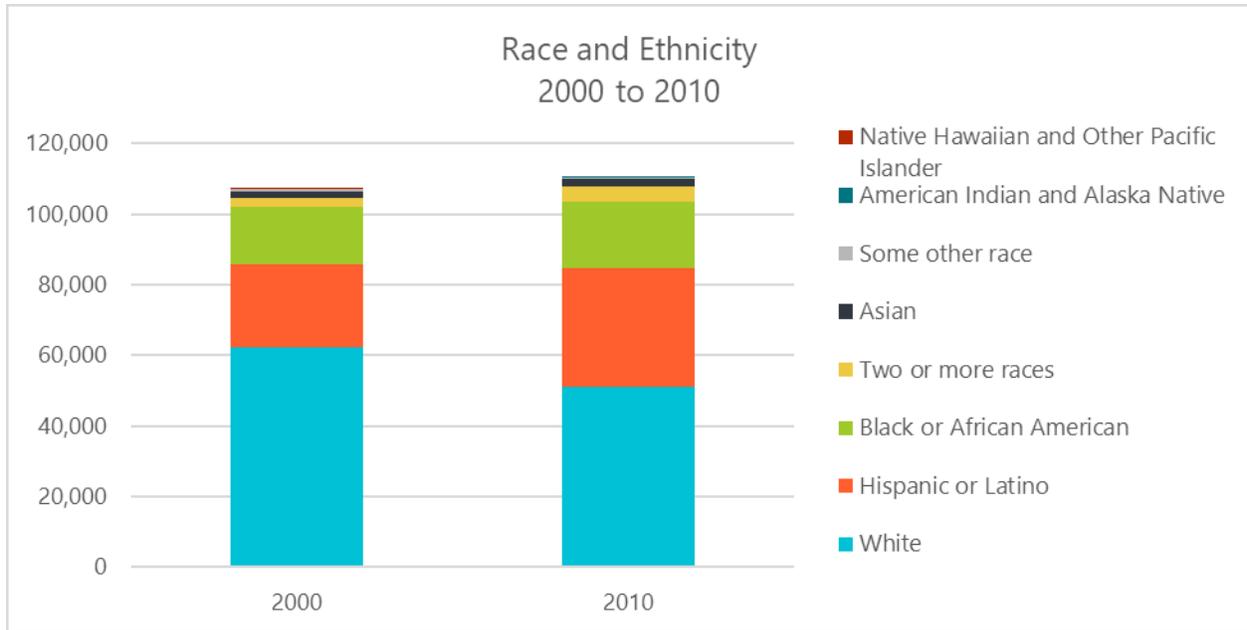
The bullet points below summarize the most salient changes and trends in this data for the City of Waterbury. These trends and changes play an important role in understanding and planning for the future housing and community development needs of Waterbury’s citizens.

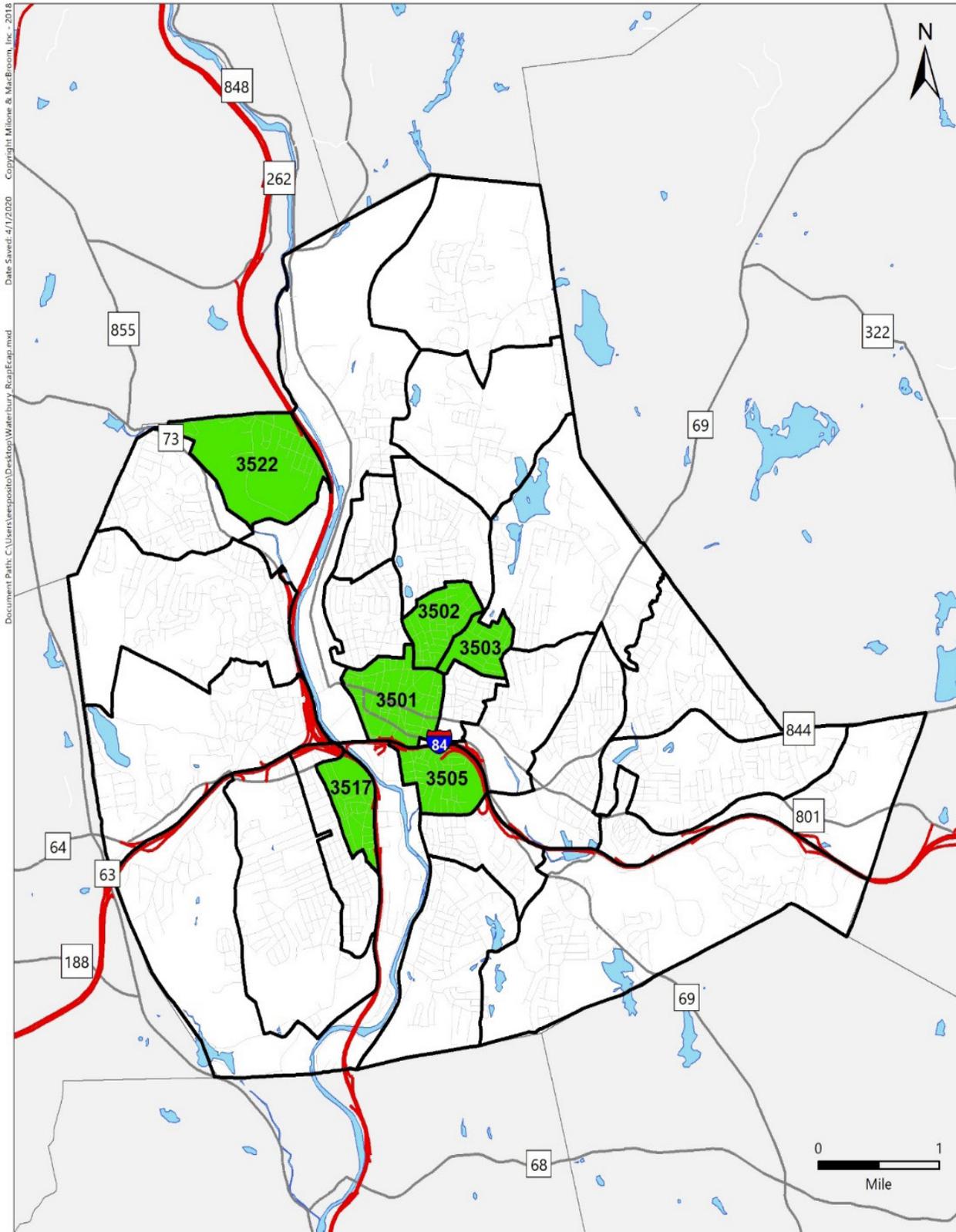
General Demographics

- Between 2000 and 2010, Waterbury’s population increased by 2.9%, from 107,271 to 110,366 residents. ACS estimates from 2015 indicate that the population decreased slightly to 108,807 residents.
- Significant changes in the age distribution profile of the city including a 2.7% increase in the young adult population (age 20 to 34), a 4.3% increase in middle-aged adults (age 35 to 54), a 33.5% increase in older working-aged adults (age 55 to 64), and a 19.2% decrease in the senior population (age 65 years old and over).



- Median age increased from 34.9 years old in 2000 to 35.2 years old in 2010. The 2015 ACS estimates that the median age has remained at 35.2 years old.
- Between 2000 and 2010, Waterbury experienced a decrease in its Non-Hispanic White population (-9.9%) and growth in its Hispanic (47.5%) and African American (26.5%) populations.





Racially or Ethnically Concentrated Areas of Poverty



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Legend

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

Source: US Department of Housing and Urban Development

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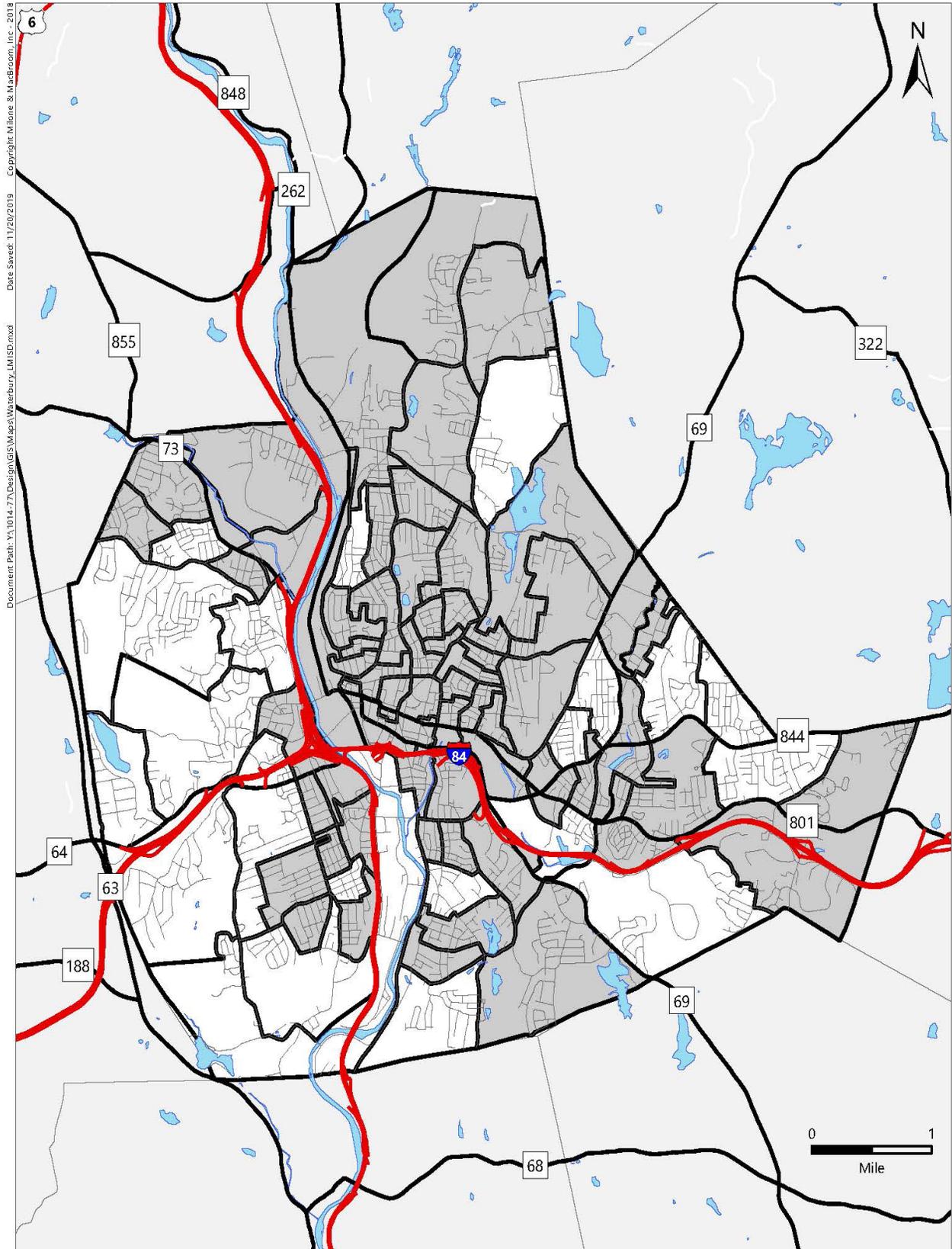
Social Characteristics

- Increase in the number of single-parent households headed by a female and decrease in the number of married couple families.
- The number of nonfamily households increased by 11.4% between 2010 and 2015. The number of single-person households decreased by 2% over the same time period.
- The number of children living with grandparents decreased between 2010 and 2015.
- Average household size grew between 2000 and 2010 from 2.46 to 2.54 persons per household. The 2015 ACS estimates that household size has continued to rise to 2.68 persons per household.
- As of 2015, 36.9% of Waterbury residents spoke a language other than English at home. About 38.2% of these residents reported speaking English less than “very well.” The number of Spanish-speaking residents increased by 27% between 2010 and 2015.
- As of 2015, 18.4% of Waterbury residents were foreign born, which is up from 14.6% in 2010. The largest number of foreign-born residents come from the Dominican Republic, Jamaica, Albania, and Italy.
- About 9.2% of Waterbury’s population was born in Puerto Rico as of 2015, up from 7.7% in 2010. In 2017, Hurricane Maria caused major damage on the island of Puerto Rico, causing many to move to mainland United States. Although Census Bureau data statistics are not available to enumerate population changes as the result of Hurricane Maria, local housing and service providers have reported noticeable growth in the Puerto Rican population.
- The number of adults age 25 years old and over that have a bachelor’s degree or higher decreased from 16.9% in 2010 to 15.2% in 2015.
- The number of adults age 25 years old and over with less than a high school degree decreased from 21.4% in 2010 to 20.5% in 2015.

Economic Characteristics

- According to the Connecticut Department of Labor, Waterbury’s unemployment rate has decreased from 14.1% in 2010 to 6.6% in 2018. However, the City’s civilian labor force decreased by 3.7% during that same time period, meaning that there are fewer people employed or looking for work than there were in 2010.
- According to 2015 ACS estimates, Non-Hispanic Whites experience lower unemployment rates compared to African Americans and Hispanics. Persons with disabilities and persons with less than a high school degree are disproportionately more likely to be unemployed compared to the general population.
- The distribution of employment across sectors has remained relatively consistent. Between 2010 and 2015, the share of Waterbury residents working in the healthcare and social assistance sector decreased by 1%, while the share of residents working in administration, accommodation, and educational service sectors increased by less than 1%. Healthcare and social services had the largest number of employees and highest wages in 2015.
- Manufacturing employs 14% of workers in Waterbury. These jobs tend to have higher wages and there is a need for more workers in this sector. However, current industrial job skills do not meet the needs of 21st-century manufacturing processes.

- Between 2010 and 2015, the number of residents that take public transportation to work has remained the same (4.3%). However, driving alone remains the predominant means of transportation to work for nearly 80% of residents.
- Median household income increased slightly from \$40,254 in 2010 to \$40,467 in 2015. However, the rate of increase has not kept up with the pace of inflation.
- Because household incomes are increasing at a lower rate than inflation, the number of families that are living in poverty has increased.
- The ACS 2017 reported that 24.3% of Waterbury residents have incomes below the poverty level; but for unrelated individuals, 25.8% of the single males and 28.5% of the single females have incomes below the poverty level. These reports show that single persons – whether they are living alone or in a nonrelated household – have similar poverty levels as persons living in a related household.
- The term “low to moderate income” has a specific programmatic context within the CDBG program. The United States Department of Housing and Urban Development (HUD) uses special tabulations of Census data to determine areas where at least 51% of households have incomes at or below 80% of the area median income (AMI). The following map highlights the Census Block Groups that fit this criterion within the city of Waterbury. Low- to moderate-income communities are concentrated on the city center, north-end, and east-end.



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Target Areas



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-  Census Tracts
-  Low & Moderate Income Target Areas

Low to moderate income individual data by block group based on
 the 2011-2015 American Community Survey (ACS)
 associated with the FY 2019 Entitlement CDBG Grantees.



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Housing Tenure

Between 2000 and 2010, the number of occupied housing units in Waterbury has increased by 139 units. From 2010 to 2015, the number of occupied housing units declined by over 2,500 units. However, this may be due to the differences in sampling methodology between the decennial census and ACS. Housing tenure remained relatively unchanged over the time period, with 53% of units being owner-occupied and 47% of units being renter-occupied. The 2015 ACS provides an estimate of occupied housing units. Based on that estimate, from 2000 to 2015 number of occupied housing units in Waterbury has decreased by 2,409 units.

Waterbury's housing stock is predominantly multifamily, renter-occupied homes. The city also has certain neighborhoods that have very high concentrations of rental units. Waterbury's rental stock is primarily made up of one-, two-, and three-or-more bedroom units.

Occupied Housing Units by Tenure: 2000 to 2015

Housing Tenure	2000		2010		2015	
	Number	% of Total	Number	% of Total	Number	% of Total
Owner-Occupied	20,291	47.61%	19,847	47.76%	18,460	45.91%
Renter-Occupied	22,331	52.39%	21,706	52.24%	21,750	54.09%
Total	42,622	-	41,553	-	40,210	-

Source: QT-H2 – Tenure, Household Size, and Age of Householder: Census 2000
 DP04 – Selected Housing Characteristics: ACS 2010
 Source: 2011-2015 Comprehensive Housing Affordability Strategy (CHAS)

Housing Condition

The incidence of physical inadequacy (which does not necessarily overlap with the HUD definition of "housing problems" as defined in the 2011-2015 Comprehensive Housing Affordability Strategy [CHAS] data) in the city's renter- and owner-occupied units is difficult to determine. Various statistical indicators can be used, but each provides a different estimate. It is statistically problematic to add the indicators together as many substandard properties will overlap into several indicators. The vacancy rate in Waterbury has steadily increased from 9% in 2000 to 11% in 2010 and 15% in 2015. This climb could be indicative of units that are undesirable due to their poor condition.

The incidence of physical inadequacy can also differ depending on the housing quality standard used as a base and what a household perceives and reports as a physical inadequacy. For example, the existence of a city code violation (building, fire, etc.) can classify a building as substandard. On the other hand, HUD minimum property standards may have requirements which are more restrictive than local codes. For this report, the 2015 CHAS datasets (based on ACS) on the lack of adequate plumbing and kitchen facilities were reviewed as indicators of severely inadequate housing. As of 2015, about 0.5% of Waterbury households lacked complete plumbing or kitchen facilities. These indicators appear most frequently in very low- and low-income households, but it is impossible to determine the exact percentages or to estimate the tenancy of these units due to the small sample size and large margin of error. As a result, this information cannot be used to assess the amount of the city's housing stock that is suitable for rehabilitation. Nevertheless, given the age of the units within the city and the high percentage of households experiencing housing problems, there is a clear need for rehabilitation programs in Waterbury, particularly for low-income families.

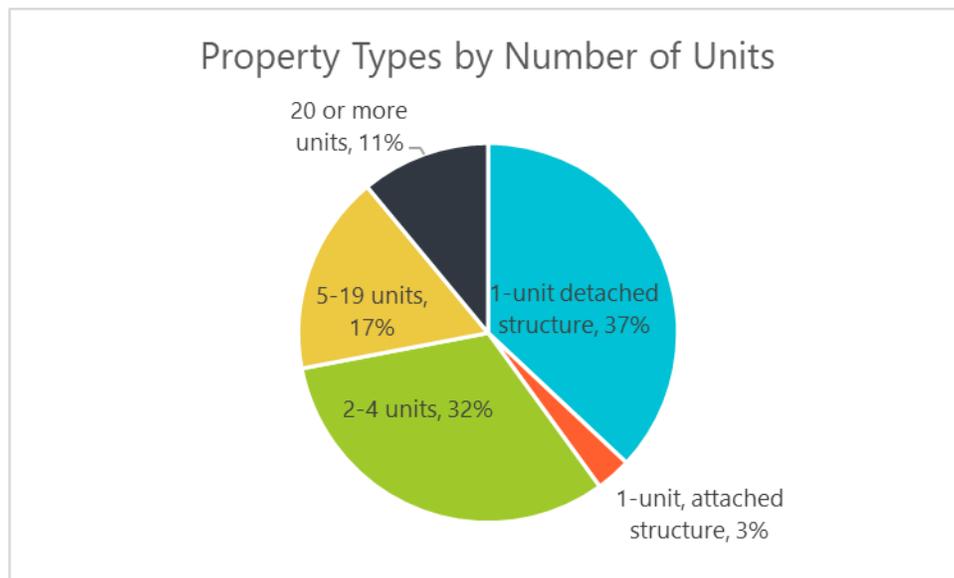
Units in Structure

The percentage of housing units in various residential structure types has changed only slightly since the last AI. Roughly 37% of the city's housing stock is in the form of single-family detached homes. Another significant component of the city's housing stock is in the form of 2- to 4-family residential structures, with 32% of housing units situated in these types of structures. About 17% of units are in structures that have

between 5- and 19-units, and another 11% are in structures with 20 or more units. The table below provides a breakdown of units in structure for 2015.

Property Type	Number	%
1-unit, detached structure	17,525	37%
1-unit, attached structure	1,620	3%
2 to 4 units	15,120	32%
5 to 19 units	7,830	17%
20 or more units	5,145	11%
Mobile home, boat, recreational vehicle (RV), van, etc.	105	0%
Total	47,345	100%

Source: 2011-2015 ACS



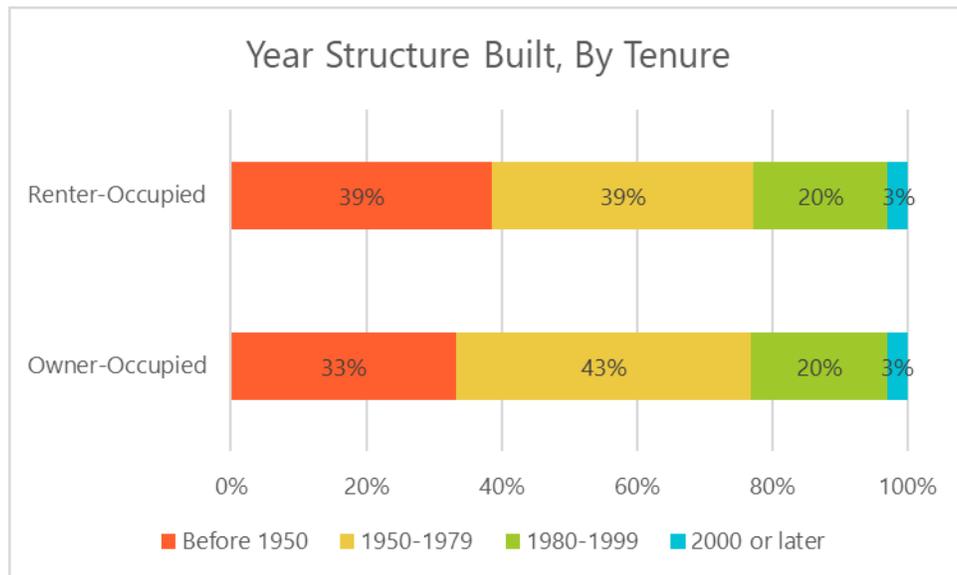
Year Structure Built

Waterbury is home to an aging housing stock. Age distribution has stayed relatively stable in recent years. Only about 3% of housing units were built since 2000. About 36% of housing units were built before 1950. A greater share of renter-occupied units (39%) were built before 1950 compared to owner-occupied units (36%). A breakdown of housing age by tenure is shown in the following table.

Year Unit Built by Tenure for Occupied Housing Units: 2015

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	615	3%	600	3%
1980 to 1999	3,725	20%	4,310	20%
1950 to 1979	7,945	43%	8,380	39%
Before 1950	6,175	33%	8,460	39%
Total	18,460	--	21,750	--

Source: 2011-2015 CHAS



Housing Sales

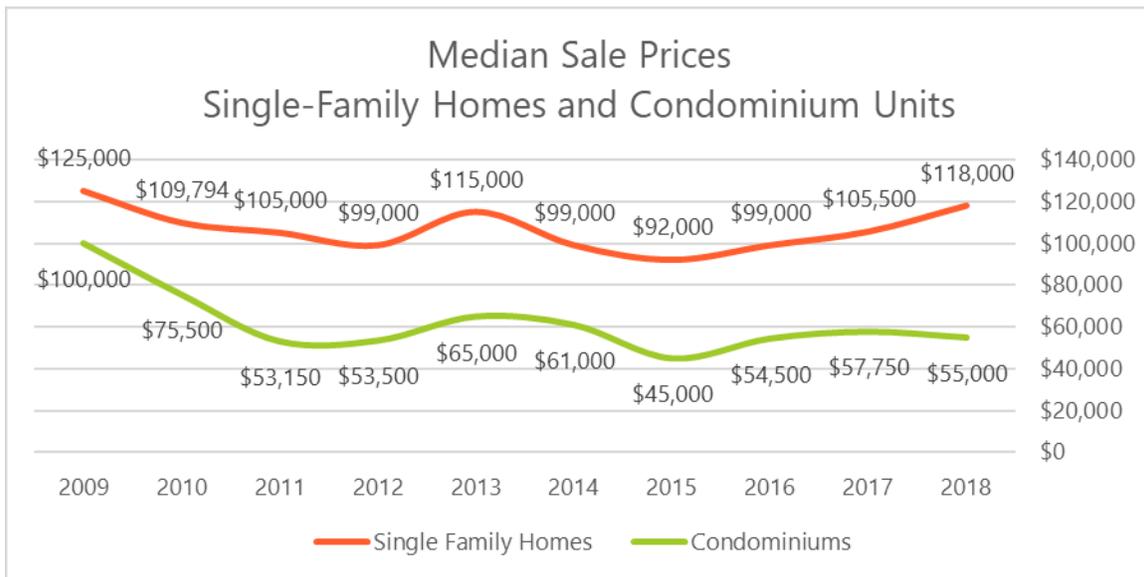
The median sale price for single-family homes has fallen between 2009 and 2018 from \$125,000 to \$118,000 per year. Although median sale prices are still well below their prerecession peak of \$164,900 in 2006, they have steadily risen since 2015. Median condominium sale prices dropped by 45% between 2009 and 2018. The lack of recovery in home sale prices may discourage homeowners from investing in their properties, which may lead to further disinvestment and result in lower property values. Sales may also be suppressed by property taxes, which add to the overall cost of owning a home. Many low-income families lack the financial resources for a down payment or lack the credit history to secure a mortgage.

Median Sale Prices, 2009 to 2018 Single-Family Homes and Condominium Units City of Waterbury

Year	Single-Family Homes	Condominiums
2018	\$118,000	\$55,000
2017	\$105,500	\$57,750
2016	\$99,000	\$54,500
2015	\$92,000	\$45,000
2014	\$99,000	\$61,000

Year	Single-Family Homes	Condominiums
2013	\$115,000	\$65,000
2012	\$99,000	\$53,500
2011	\$105,000	\$53,150
2010	\$109,794	\$75,500
2009	\$125,000	\$100,000
% Change, 2009 to 2018	-5.6%	-45.0%

Source: The Warren Group



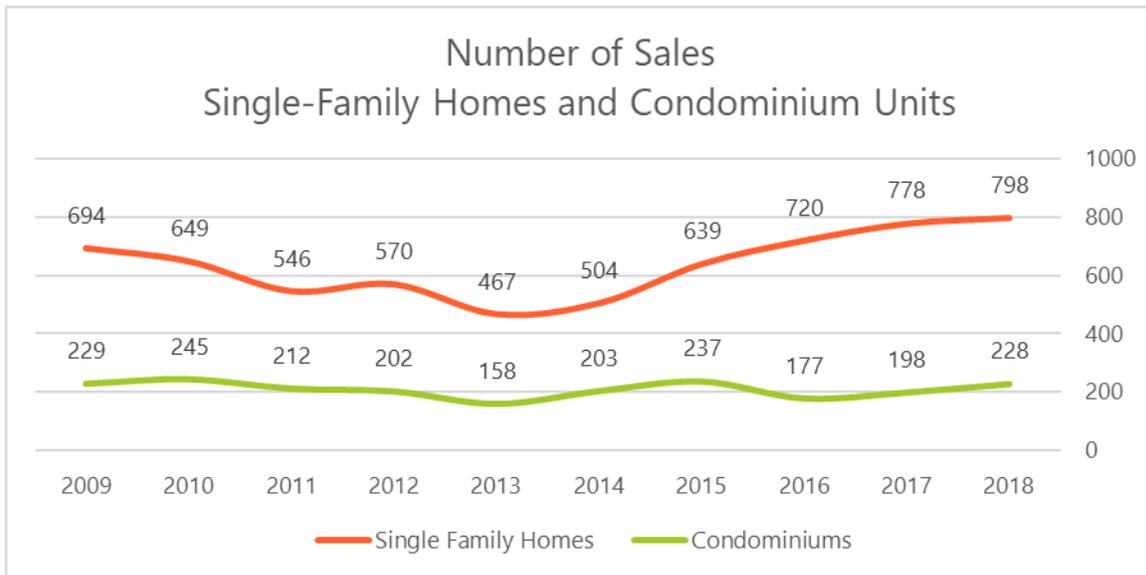
The number of single-family sales has rebounded significantly from the early 2010s to 2018, as the city's housing market recovered from the Great Recession. Single-family sales decreased from 694 in 2009 to a low of 546 in 2011. Since 2011, single-family sales have increased significantly, reaching 798 in 2018. Overall, single-family sales are up 15% between 2009 and 2018. The increases in sales may be related to the reduction in median price. Condominium sales were stable between 2009 and 2018, although they are up significantly from their Recession low of 158 sales in 2013. Condominium sales and price recovery have been weaker than single-family homes.

Number of Sales, 2009 to 2018
Single-Family Homes and Condominium Units
City of Waterbury

Year	Single-Family Homes	Condominiums
2018	798	228
2017	778	198
2016	720	177
2015	639	237
2014	504	203

Year	Single-Family Homes	Condominiums
2013	467	158
2012	570	202
2011	546	212
2010	649	245
2009	694	229
TOTAL	6,365	2,089
Annual Average	637	209
% Change, 2009 to 2018	15.0%	-0.4%

Source: The Warren Group



Fair Market Rents

The following table illustrates the HUD-defined Fair Market Rents (FMRs) for the Waterbury HUD Metropolitan FMR Area. Over the last 5 years, the FMRs for smaller housing units (efficiencies and 1 bedroom units) have increased at the fastest rates, 19% and 15% respectively. FMRs for 2- and 3-bedroom units have increased at a lower rate of 13% over the last 5 years.

Rent levels have been rising over the last 5 years. In the past, FMRs established by HUD for the Housing Voucher Program have often represented the high end of the rental market. Recently, however, rents in the \$1,000 to \$1,200 range in the private marketplace have been asked and achieved. This increases the affordability problem for low- and very low-income households. With the declining number of Housing Vouchers available and incomes not increasing at the same rate as inflation, additional pressure is being placed on low- and moderate-income households to find affordable rents.

Fair Market Rents in Waterbury HUD Metro FMR Area: 2016 to 2020

Number of Bedrooms	2016	2017	2018	2019	2020
Efficiency	\$611	\$631	\$669	\$713	\$729
1-bedroom	\$790	\$801	\$852	\$901	\$906
2-bedroom	\$990	\$994	\$1,049	\$1,110	\$1,119
3-bedroom	\$1,233	\$1,244	\$1,315	\$1,391	\$1,394
4-bedroom	\$1,403	\$1,394	\$1,442	\$1,539	\$1,573

Source: HUD

Housing Permits

According to data on housing production collected by the State of Connecticut’s Department of Economic and Community Development (DECD), just 404 new units were produced in the city of Waterbury between 2009 and 2018. These permits do not consider the 483 demolition permits that were issued during that same time period. As a result of these demolitions and the small number of new units being constructed, the city saw a net decrease of 79 housing units between 2009 and 2018. The decrease in the number of housing units may result in greater competition for the city’s remaining housing stock, particularly for very low- and low-income families.

Housing Permits by Number of Units in Structure, 2009 to 2018 City of Waterbury

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Total	37	32	28	62	34	44	71	40	29	27	404
1 unit	33	30	28	15	34	13	61	40	29	15	298
2 units	4	2	0	0	0	2	10	0	0	0	18
3 to 4 units	0	0	0	0	0	0	0	0	0	0	0
5 or more units	0	0	0	47	0	29	0	0	0	12	88

Source: State of Connecticut Dept. of Economic and Community Development

Affordable Housing Units

According to DECD’s 2018 Affordable Housing Appeals List, Waterbury has 10,046 affordable housing units, comprising about 20.9% of the city’s total housing stock. Since 2010, the percentage of units that meet the State’s affordable housing criteria has decreased by approximately 2%.

Home Mortgage Disclosure Act Statistics

Since the cost of housing is the primary barrier to housing choice in Waterbury and the State of Connecticut as a whole, the availability of mortgage financing for housing is crucial to the reduction of barriers. In order to examine the availability of mortgages, data collected under the Home Mortgage Disclosure Act (HMDA) was researched. The following discussion summarizes the results of this research.

The HDMA data was analyzed for 2017 (the most recent year available) for Waterbury and the New Haven-Milford Metropolitan Statistical Area (MSA). The ratio between mortgage application approvals and denials was computed for both geographies. For the MSA, the rate was 0.12 for conventional mortgages and

0.19 for FHA/VA/RHS mortgages. The denial-to-approval ratio for the City of Waterbury is higher than the MSA across all loan types. The ratio for conventional purchases was 0.21, and the ratio for FHA/VA/RHS mortgages was 0.26. As shown on the following map, 17 out of 28 Census tracts in Waterbury have higher-than-average denial rates across all loan types. These tracts are located primarily in the center, in addition to the northern and western quadrants, of the city.

Ratio of Denials to Approvals, 2017
City of Waterbury and New Haven-Milford MSA

Geography	FHA, FSA/ RHS & VA Purchases	Conventional Purchases	Refinancings	Home Improvement Loans
Waterbury	0.26	0.21	0.94	2.10
New Haven-Milford MSA	0.19	0.12	0.54	0.92
Number of Waterbury Census tracts with higher ratio than city-wide	17	14	17	15
Number of Waterbury Census tracts with lower ratio than city-wide	11	14	11	13

Source: Home Mortgage Disclosure Act Database, United States Consumer Finance Protection Bureau

In addition to the Census-tract-level analysis, the denial-to-approval ratios were analyzed by race and ethnicity for applicants in the New Haven-Milford MSA. The results of this analysis are summarized in the following table. Generally, denial-to-approval ratios for Non-Hispanic White borrowers were lower than that of the population as a whole, and significantly lower than other racial and ethnic groups in most instances. For conventional home purchases, African Americans and Native Hawaiians/Pacific Islanders have nearly two to three times the denial-to-approval ratio as Non-Hispanic Whites. Across all loan types, African Americans have higher rates of denials than Non-Hispanic Whites.

Ratio of Denials to Approvals by Race and Ethnicity: 2017¹
New Haven-Milford MSA

Race or Ethnicity	FHA, FSA/ RHS & VA Purchases	Conventional Purchases	Refinancings	Home Improvement Loans
White, Non-Hispanic	0.15	0.10	0.45	0.71
African American	0.25	0.24	1.13	2.86
Hispanic	0.20	0.16	0.78	2.50
Asian	0.22	0.12	0.45	0.79
Native American	0.33	0.00	1.42	5.50
Native Hawaiian/Pacific Islander	0.43	0.29	0.71	-

Source: Home Mortgage Disclosure Act Database, United States Consumer Finance Protection Bureau

¹ Based on primary applicant race and ethnicity.

EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

Housing Complaints

The range of complaints and inquiries received by the Fair Housing Assistance Program within the last 5 years is reflected in the table below. Complaints with multiple bases are listed under each basis so they appear to be counted twice. There were 50 total complaints from 2015 to 2019.

Fair Housing Assistance Program	2015	2016	2017	2018	2019	Count
Disability	5	3	3	3	5	19
Family status	2	2	0	0	1	5
National origin	0	0	0	1	3	4
Race	4	2	1	3	2	12
Color	1	0	0	2	1	4
Sex	4	0	2	0	1	7
Religion	2	0	0	0	0	2
Retaliation	0	1	2	0	0	3
Count	18	8	8	9	13	

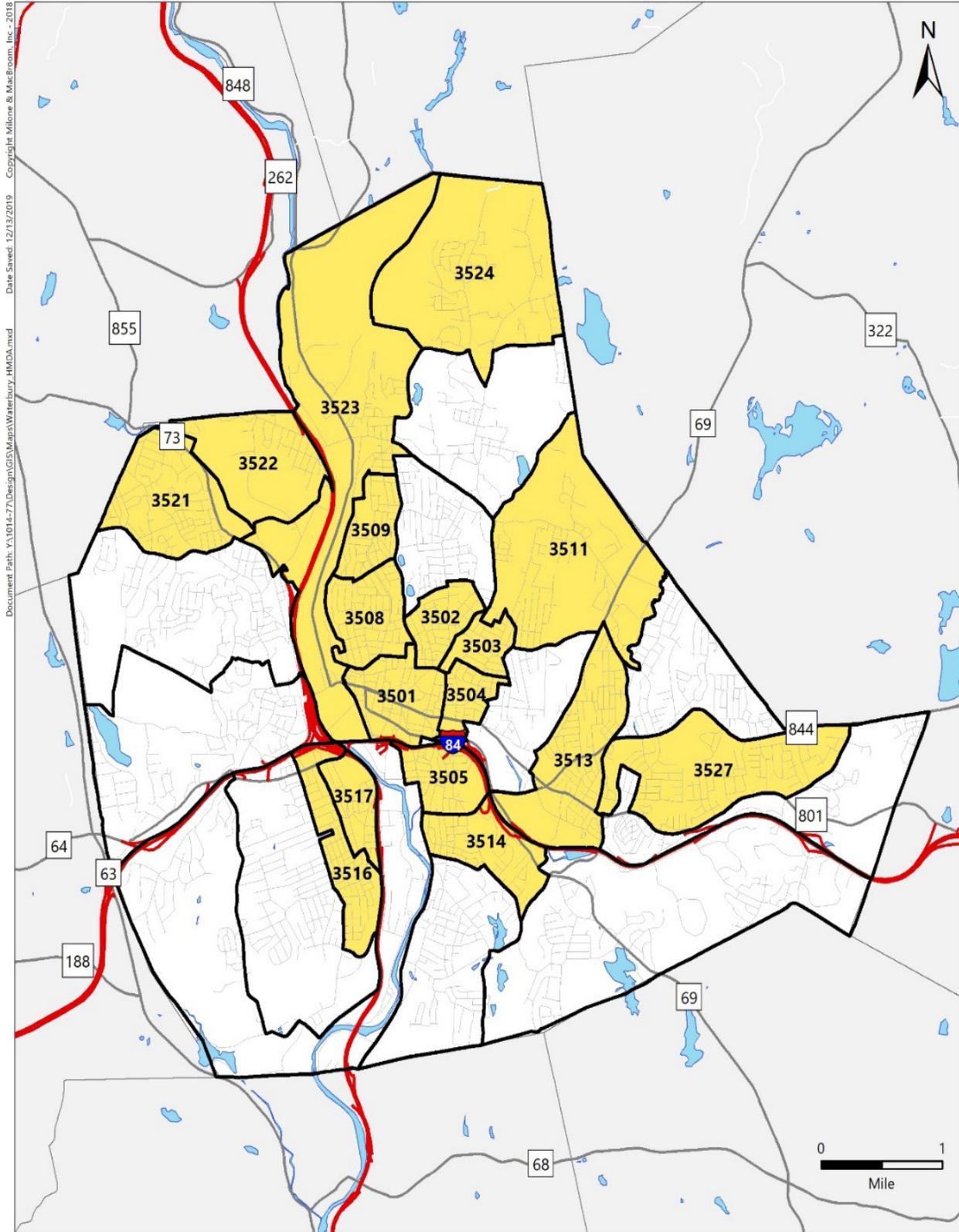
Source: HUD, January 2020

Public Sector Issues

The City of Waterbury does not present impediments to fair housing choice. The housing stock in the city provides a range of housing types and densities. However, as discussed earlier, affordability continues to be an issue faced by low- and very low-income residents. The cost burden is such that many households find themselves paying over 50% of their income for housing.

Legal Status

There are no fair housing discrimination suits filed by the Department of Justice or private plaintiffs, nor has the Secretary of HUD issued a charge or made a finding of discrimination.



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Census Tracts with Higher than Average Mortgage Denial Rates: 2017



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Census Tracts
 Higher than Average Denial Rates

Source: Home Mortgage Disclosure Act Database: 2017
 Consumer Finance Protection Bureau



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IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Through analysis of background data and feedback from stakeholders, the following impediments to fair housing choice were identified:

- Tenants and landlords may lack of knowledge about Fair Housing Laws.
- Persons with Limited-English Proficiency may have difficulty accessing housing and city services.
- There is a lack of accessible units for persons with disabilities.
- There is a lack of affordable housing units in the region.
- Market forces disincentivize the development of new units and property maintenance.
- Discriminatory rental practices
- Unequal lending practices

ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES TO ADDRESS IMPEDIMENTS TO FAIR HOUSING CHOICE

Tenants and landlords may lack of knowledge about Fair Housing Laws.

Advocates reported a lack of understanding of Fair Housing Laws among residents of Waterbury. Particularly, few residents understand that discrimination is illegal, that there are local bodies such as the Waterbury Human Rights Commission (HRC) able to receive and handle their complaints, or that there is legal advice available to them through Connecticut Legal Services. Residents could benefit from increased outreach regarding city programs, the local HRC and its powers and responsibilities, and general information on laws protecting residents from discrimination.

On the other side of the equation, landlords may not be receiving adequate fair housing information. Landlords are important stakeholders in providing fair housing choice to members of protected classes. Additional fair housing education opportunities provided by the City and other qualified entities may better equip this group with the knowledge and understanding needed to provide fair housing choice to members of protected classes.

Persons with Limited-English Proficiency may have difficulty accessing housing and city services.

The number of city residents with Limited-English Proficiency has grown significantly in recent decades. Two language groups (Spanish and "Other Indo European") exceed safe-harbor minimums. While the City employs bilingual staff and has a limited policy concerning translation services, the city's substantial and growing Limited-English Proficiency population likely calls for further accommodation under Title VI of the Civil Rights Act of 1964. The Housing Authority should complete a robust Language Access Plan to ensure these groups have access to public housing.

There is a lack of accessible units for persons with disabilities.

The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities. Older multifamily structures are commonly exempt from the accessibility standards that apply today, and the amount of public funding available to support accessibility modifications of single-family housing is limited. Considering the age and configuration of the city's housing stock, persons with mobility impairments have difficulty finding housing to fit their needs.

There is a lack of affordable housing units in the region.

The City of Waterbury has limited options in terms of expanding the supply of affordable housing. Waterbury is an older urban center with an aging housing stock and little, if any, land available for new development. Due to the age of the city's multifamily housing stock, many apartment buildings are functionally obsolete and costly to rehabilitate. In many cases, the design of these structures makes accessibility enhancements cost prohibitive. As a result of these circumstances and due to the regional impact of public policies concerning fair housing, intergovernmental cooperation on education, outreach, and mobility is essential to achieving desegregation.

Market forces disincentivize the development of new units and property maintenance.

Poor property maintenance and abandonment in Waterbury limit the availability of decent and safe units within the city's affordable housing stock. Blighted properties in Waterbury bring down property values and further degrade neighborhoods. While rental units are an affordable housing option, these units should be well-managed and maintained to add to the stock of not only affordable, but decent and safe housing within the city.

Discriminatory rental practices

Housing Choice Voucher holders experience difficulty in securing private rental housing. Certain landlords are not willing to rent their apartments to voucher holders, despite the Source of Income Protection in state and local laws.

Local for-sale and rental housing advertisements include language that may discourage certain members of protected classes from applying. When available rentals are advertised by word of mouth, potential renters who rely on newspaper ads are unaware of all the housing options available to them.

Unequal lending practices

There are uneven ratios of loan denials to approvals for Waterbury residents of different races and ethnicities. Mortgage lending data from 2017 suggests that some racial minorities are more likely to experience mortgage application denial or high-cost lending than White applicants.

CONCLUSION

Conclusions

Public sector policies in Waterbury do not present impediments to fair housing choice. Zoning policies provide a range of housing types. Enterprise and Opportunity Zones in the city provide incentives to spur economic development. There are three neighborhood Revitalization Zones in addition to many neighborhood associations and clubs working to reinvigorate the city. As part of its ongoing efforts, the City is increasing the affordable housing supply with financial assistance for home purchasing and rehabilitation. However, affordability continues to be an issue faced by low- and very-low income residents. This affordability issue is a primary impediment to fair housing choice.

There are other conditions which present barriers to fair housing choice, including limited family-style stock, lack of accessible units for persons with disabilities, the condition of aging public housing units, and the lack of knowledge on the part of private owners as to their responsibilities to comply with fair housing laws. Other barriers include the “quiet” word-of-mouth rental market and large population with Limited-English Proficiency. In both instances, individuals may miss out on available rental opportunities due to language or social obstacles.

Impediments Identified and Actions Taken to Address Impediments to Fair Housing Choice

Tenants and landlords may lack of knowledge about Fair Housing Laws.

1. The City should update its website to include a fair housing page with basic info and links to HUD, Commission on Human Rights and Opportunities (CHRO), and special focus on the City’s HRC.
2. The City should assist in updating and improving the HRC’s webpage to include meeting dates, meeting agendas, a list of members, duties, and responsibilities, etc., to begin an education campaign with the goal of making the entity more visible and active.
3. The City should continue to provide training opportunities to HRC members. This could include repeatedly bringing in CHRO to conduct the training, sending members to training workshops, or contracting with a qualified entity to provide the training inhouse.
4. The City should require fair housing training as part of the CDBG, HOME, and Emergency Solutions Grant (ESG) application processes. Local nonprofits are important distributors of information throughout the community, and educating them to disperse fair housing information and conduct their programs in nondiscriminatory ways is an important component of building a comprehensive fair housing network.
5. The City should continue to collaborate with the Board of Realtors to include fair housing information in the proposed housing information database, should it be completed. By providing fair housing information at the start of a housing search, residents can understand their rights and responsibilities when interacting with realtors and sellers.
6. The City should continue offering fair housing training to boards, commissions, and resident groups. The local fair housing officer has worked with groups throughout Waterbury to expand knowledge of fair housing practices, and this should continue.
7. The City should provide fair housing training to local landlords. The training should include information about the Section 8 voucher program, laws regarding source of income legislation, the rights and responsibilities of landlords, etc.

Persons with Limited-English Proficiency may have difficulty accessing housing and city services.

1. The Waterbury Community Development Office should conduct the four-factor analysis to determine the extent to which translation services may be needed to expand access to its services and programs for persons with Limited-English Proficiency.
2. The Housing Authority of the City of Waterbury should complete the Language Access Plan.

There is a lack of accessible units for persons with disabilities.

1. The Housing Authority of the City of Waterbury should continue the proposed renovations of its housing complexes.

There is a lack of affordable housing units in the region.

1. The City should continue to support the efforts of state-wide organizations, such as the Partnership for Strong Communities and the Council of Governments (COG), to develop strategies that expand fair housing choice for all residents of the region. The City should support organizations' regional fair housing outreach and education initiatives and consider adopting their policies and programs that provide intramunicipal mobility options to members of protected classes and other lower-income residents of the community.
2. The City should continue to work with the Connecticut Department of Transportation and COG to improve transit connections outside Waterbury, when possible, including improved access along the Waterbury Branch of the New Haven train line. While transit improvements have been made within the city, access to regional job centers is still limited and could be improved.

Market forces disincentivize the development of new units and property maintenance.

1. The City should undertake a rental housing inspection program. The age of housing within the city, widespread blight, and some absentee landlords necessitate such a program to improve the quality of rental housing in the city. Such a program could also provide a venue for mandating fair housing training for landlords.

Discriminatory rental practices

1. The Housing Authority of the City of Waterbury should actively and consistently seek to place new landlords onto a list of those willing and prepared to accept Section 8 housing choice vouchers. Focus should be placed specifically on landlords with accessible units.
2. The City should annually recommend in writing to the *Republican American* that the publication update its online and print media to include the equal housing logo and a description of the newspaper's policy regarding real estate ads.
3. The City should provide a copy of the AI and annually recommend in writing to the *Republican American* that the publication modify its policy regarding rental real estate ads stating "no pets" or ads that seek to restrict or prohibit types of pets allowed. The newspaper should amend its policy to include the phrase "except companion/service animals permitted under fair housing laws."

Unequal lending practices

1. The City should evaluate the extent to which housing counseling is available to provide credit counseling to members of protected classes to ensure they have access to means of improving their ability to obtain and maintain decent, affordable housing.

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SIGNATURE PAGE FOR THE CITY OF WATERBURY

By my signature, I certify that the Analysis of Impediments to Fair Housing Choice for the City of Waterbury is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.



Neil M. O'Leary, Mayor



Date