



# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Waterbury  
March 2020  
MMI #1014-77

**PREPARED BY:**  
MILONE & MACBROOM, INC.  
99 REALTY DRIVE  
CHESHIRE, CONNECTICUT 06410  
(203) 271-1773  
WWW.MMINC.COM

**PREPARED FOR:**  
CITY OF WATERBURY  
235 GRAND STREET, ROOM C29  
WATERBURY, CT 06702

# TABLE OF CONTENTS

## Introduction • 3

What is an AI? • 3

What are Impediments to Fair Housing Choice? • 3

## Background data • 5

Demographic Trends and Characteristics • 5

Home Mortgage Disclosure Act (HMDA) Statistics • 16

## Evaluation of Current Fair Housing Legal Status • 18

Housing Complaints • 18

Public Sector Issues • 18

Legal Status • 18

## Identification of Impediments to Fair Housing Choice • 19

## Assessment of Current Public and Private Fair Housing Programs and Activities to Address Impediments to Fair Housing Choice • 21

Public Sector – City of Waterbury • 21

Public Sector – Housing Authority of the City of Waterbury • 22

## Conclusion • 23

Conclusions • 23

Impediments Identified and Actions Taken to Address Impediments to Fair Housing Choice • 23



# 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?

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

- (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, that affect fair housing choice.

## What are Impediments to Fair Housing Choice?

- (a) Any actions, omissions, or decisions taken because of one of the following protected classes: race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choices, or
- (b) Any actions omissions or decisions which have the effect of restricting housing choices or 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 Analysis of Impediments (AI) to Fair Housing Choice 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 the 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 WDC 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***

A complete list can be found in the Identification of Impediments to Fair Housing Choice section (page 19).

- 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.
- Residents with limited English proficiency may need assistance to access City programs, services, and policy documents.
- There are limited 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 protected classes from applying.

# BACKGROUND DATA

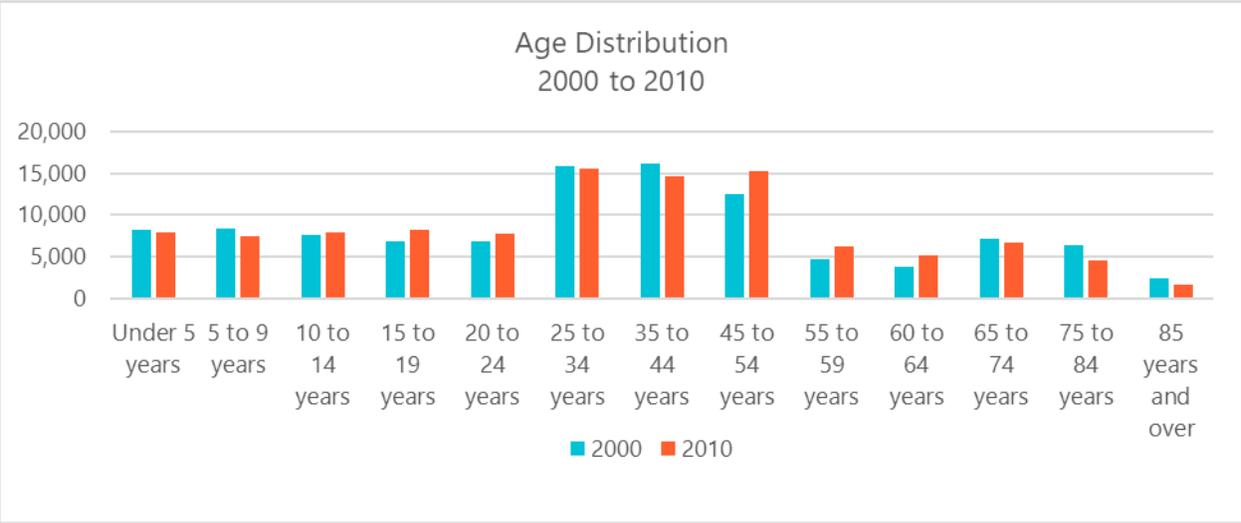
## Demographic Trends and Characteristics

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

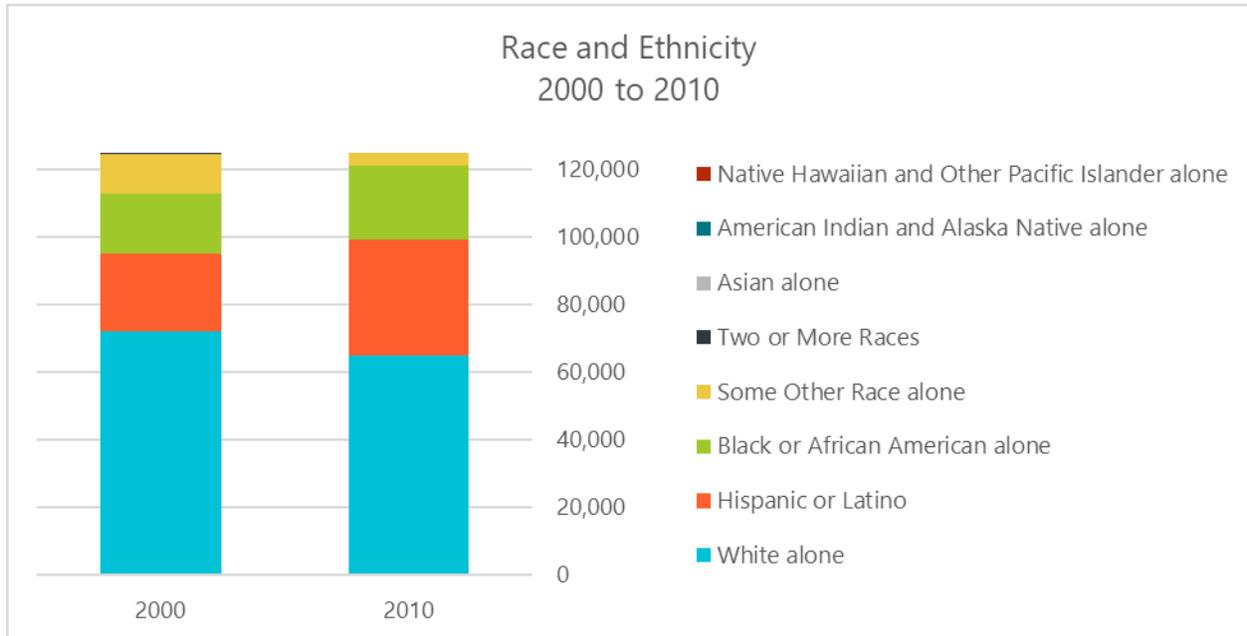
The bullet points below summarize the most salient changes and trends in this data for the City of Waterbury. These trends and changes play an important role in understanding and planning for future housing and community development needs of Waterbury's citizens.

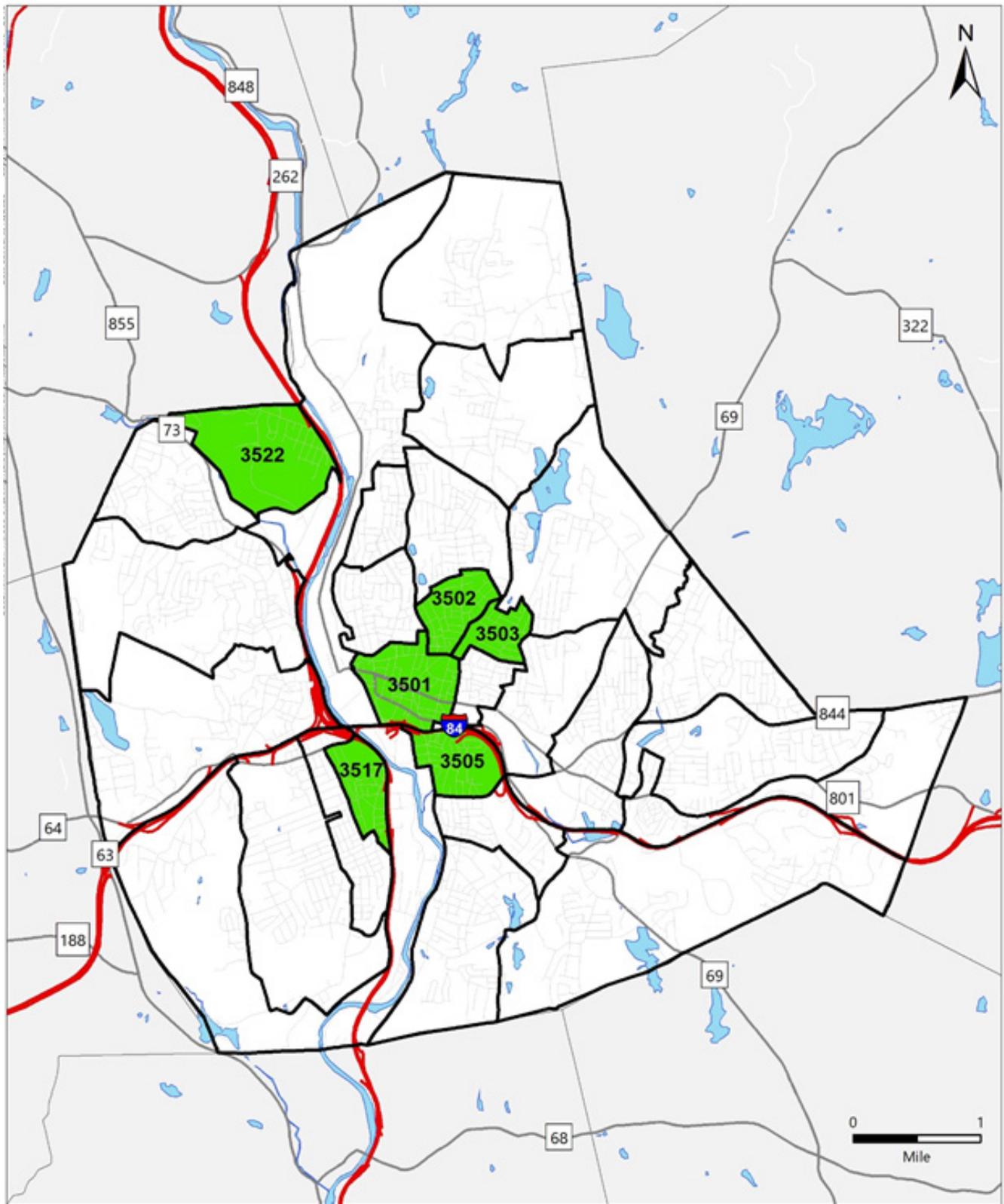
### General Demographics

- Between 2000 and 2010, Waterbury's population increased by 2.9%, from 107,271 to 110,366 residents.
- There have been 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 (R/ECAPs)



City of Waterbury  
Community Development Office  
235 Grand St.  
Waterbury, CT 06702  
(203) 597-3444

### Legend

- Racially or Ethnically Concentrated Areas (R/ECAPs)

Source: US Department of Housing and Urban Development

195 Church St  
7th Floor  
New Haven, CT 06510  
203-344-7887

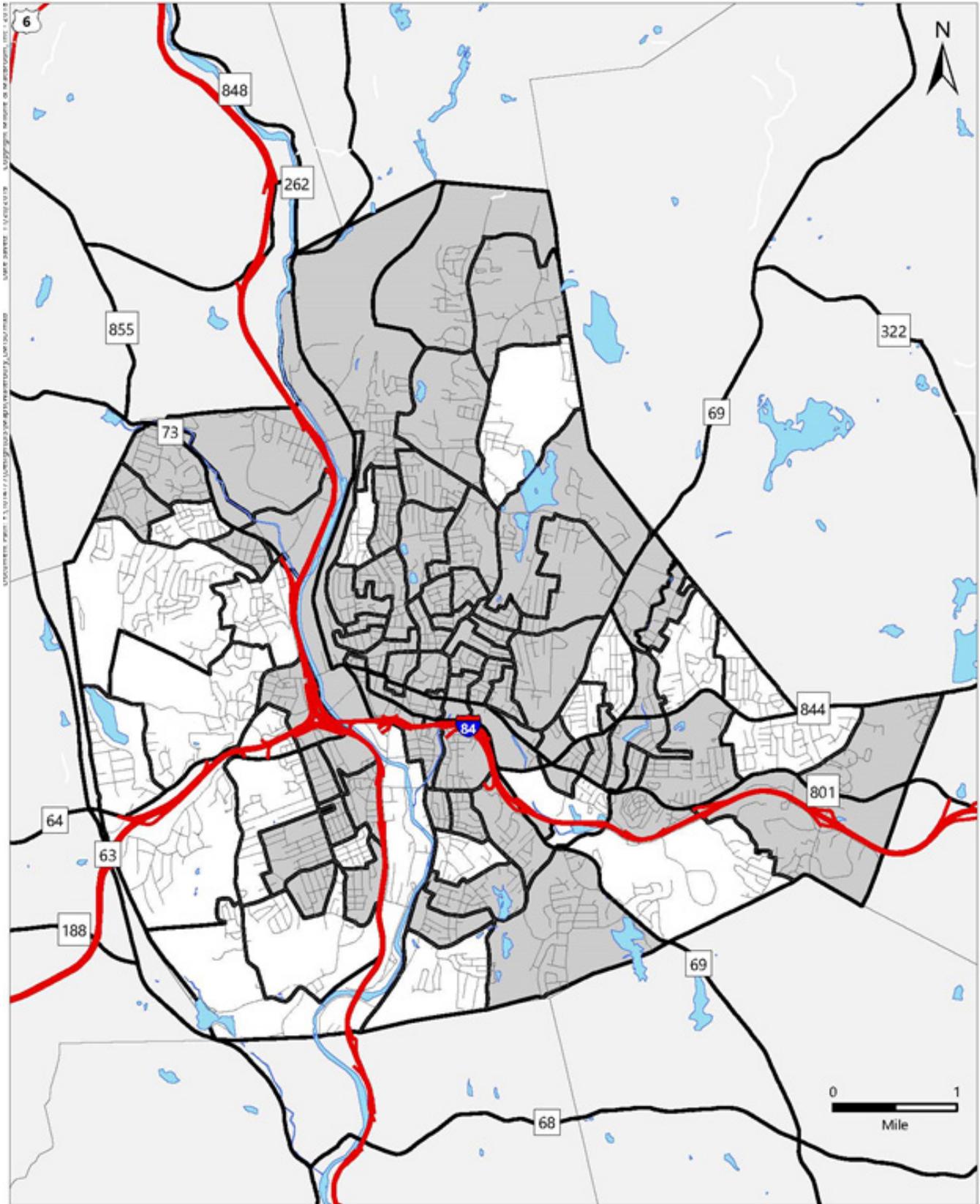
## ***Social Characteristics***

- There has been an increase in the number of single-parent households headed by a female and a 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.
- The 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, 15.2% of Waterbury residents were foreign born, up from 14.1% 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 the mainland United States. Although Census Bureau data statistics are not available to enumerate population changes as a 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 14.7% in 2010 to 6.6% in 2018. However, the City’s civilian labor force decreased by 1.9% 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 sector decreased by 1%, while the share of residents working in administration, accommodation, and educational service sectors increased by less than 1%.

- 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 reports that 24.3% of Waterbury residents have incomes below the poverty level, but for unrelated individuals, 25.8% of single males and 28.5% of 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 Community Development Block Grant (CDBG) program. 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 in the city center, north end, and west side.



### Target Areas



City of Waterbury  
 Community Development Office  
 235 Grand St.  
 Waterbury, CT 06702  
 (203) 597-3444

-  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.



195 Church St  
 7th Floor  
 New Haven, CT 06510  
 203-344-7887

## Housing Tenure

Between 2000 and 2010, the number of occupied housing units in Waterbury has increased by 139 units. Housing tenure remained relatively unchanged over that 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 the 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
<b>Owner Occupied</b>	20,291	47.61%	20,081	46.96%	18,466	45.92%
<b>Renter Occupied</b>	22,331	52.39%	22,680	53.04%	21,747	54.08%
<b>Total</b>	42,622	-	42,761	-	40,213	-

Source: QT-H2 - Tenure, Household Size, and Age of Householder: 2000, 2010

## 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 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 overlap into several indicators.

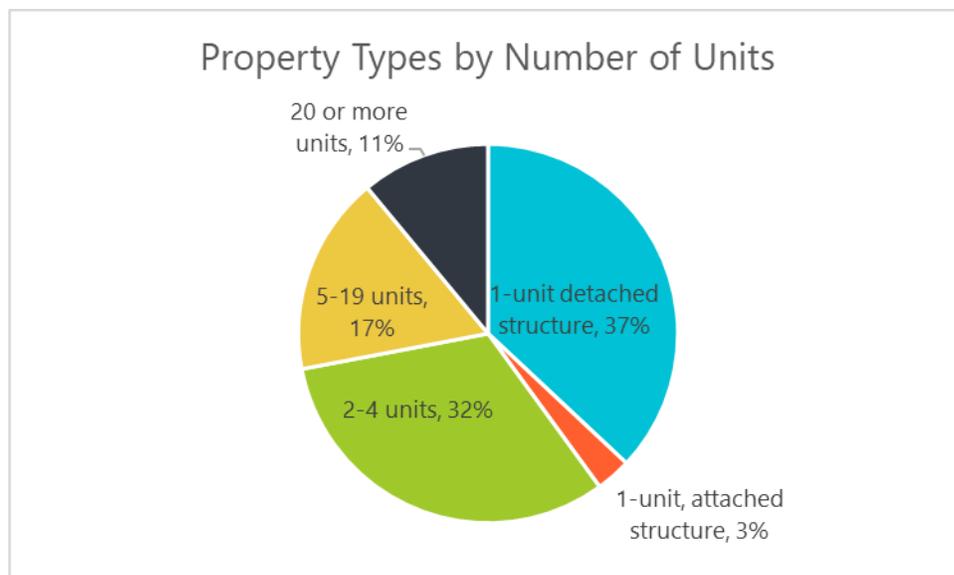
The incidence of physical inadequacy can also differ depending on the housing quality standard used as a base and what a household perceives and reports as a physical inadequacy. For example, the existence of a city code violation (building, fire, etc.) can classify a building as substandard. On the other hand, HUD minimum property standards may have requirements that are more restrictive than local codes. For this report, the 2015 CHAS dataset (based on the ACS) on the lack of adequate plumbing and kitchen facilities was 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 units in 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 two- to four-family residential structures, with 32% of the housing units situated in these types of structures. About 17% of units are in structures with between five- and nineteen-units and another 11% are in structures with 20 or more units. The table below provides the breakdown of units in structure for 2015.

Property Type	Number	%
<b>1-unit detached structure</b>	17,525	37%
<b>1-unit, attached structure</b>	1,620	3%
<b>2-4 units</b>	15,120	32%
<b>5-19 units</b>	7,830	17%
<b>20 or more units</b>	5,145	11%
<b>Mobile Home, boat, RV, van, etc.</b>	105	0%
<b>Total</b>	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	%
<b>2000 or later</b>	615	3%	600	3%
<b>1980-1999</b>	3,725	20%	4,310	20%
<b>1950-1979</b>	7,945	43%	8,380	39%
<b>Before 1950</b>	6,175	33%	8,460	39%
<b>Total</b>	18,460	--	21,750	--

Source: 2011-2015 CHAS

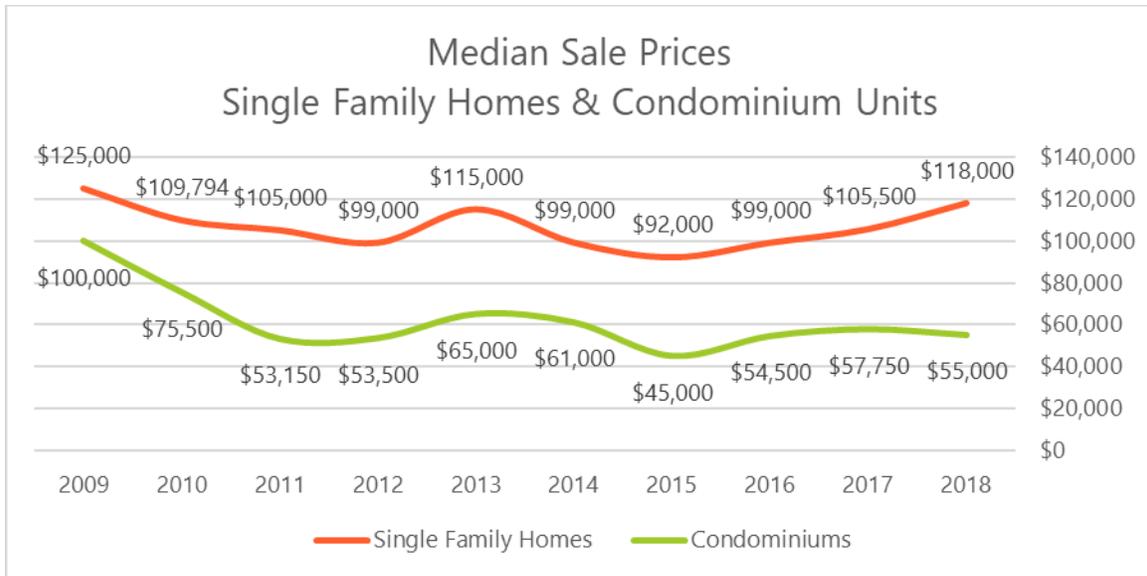
### Housing Sales

The median sale price for single-family homes has fallen between 2009 and 2018 from \$125,000 to \$118,000 per year. In addition, median sale prices are still well below their prerecession peak of \$164,900 in 2006. Median condominium sale prices dropped by 45% between 2009 and 2018, which may be due to the small number of sales. 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. While Waterbury's housing stock remains more affordable than most other Connecticut municipalities, 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 - 2018 Single Family Homes & 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
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, 2009-2018	-5.6%	-45.0%

Source: The Warren Group

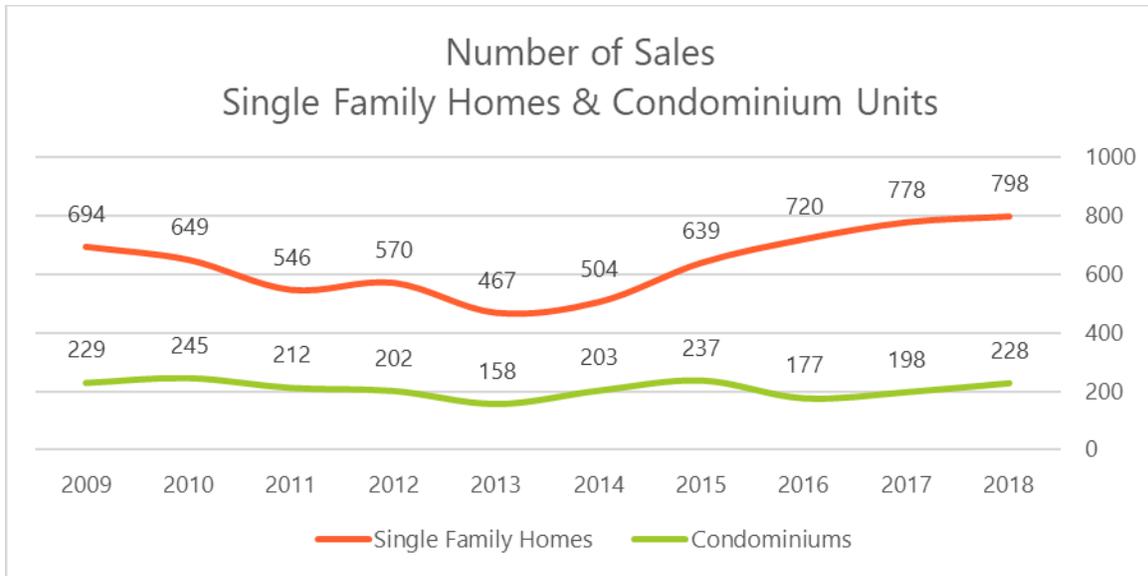


The number of single-family sales has rebounded significantly from the early 2010s to 2018 as the City’s housing market recovered from the Great Recession. Single-family sales decreased from 694 in 2009 to a low of 546 in 2011. Since 2011, single-family sales have increased significantly, reaching 798 in 2018. Overall, single-family sales are up 15% between 2009 and 2018. Condominium sales were stable between 2009 and 2018, although they are up significantly from their Recession low of 158 sales in 2013.

### Number of Sales, 2009 - 2018 Single Family Homes & 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
2013	467	158
2012	570	202
2011	546	212
2010	649	245
2009	694	229
<b>Total</b>	<b>6,365</b>	<b>2,089</b>
<b>Annual Average</b>	<b>637</b>	<b>209</b>
<b>% Change, 2009-2018</b>	<b>15.0%</b>	<b>-0.4%</b>

Source: The Warren Group



### Fair Market Rents

The following table illustrates the HUD-defined Fair Market Rents (FMRs) for 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 of 19% and 15% respectively. FMRs for 2- and 3-bedroom units have increased at a lower rate of 13% over the last five 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. However, recently rents in the \$1,000 to \$1,200 range in the private market place 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

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

*Source: U.S. Department of Housing and Urban Development*

### 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 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 number of housing units, coupled with the City's population growth 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 - 2018 City of Waterbury

	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
<b>Total</b>	<b>37</b>	<b>32</b>	<b>28</b>	<b>62</b>	<b>34</b>	<b>44</b>	<b>71</b>	<b>40</b>	<b>29</b>	<b>27</b>	<b>404</b>
<b>1-Unit</b>	33	30	28	15	34	13	61	40	29	15	298
<b>2-Units</b>	4	2	0	0	0	2	10	0	0	0	18
<b>3-4 units</b>	0	0	0	0	0	0	0	0	0	0	0
<b>5+ units</b>	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 percent of units that meet the State's affordable housing criteria has decreased by approximately 2%.

### **Home Mortgage Disclosure Act (HMDA) 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) were researched. The following discussion summarizes the results of this research.

The HMDA data were analyzed for 2017 (the most recent year available) for Waterbury and the New Haven-Milford Metropolitan Statistical Area (MSA) The ratio between mortgage applications 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 0.26 for FHA/VA/RHS mortgages. Seventeen (17) out of 28 census tracts in Waterbury have denial rates for conventional mortgages that are greater than the City-wide average. These tracts are located primarily in the center in addition to the northern and eastern quadrants of the City.

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

Geography	FHA, FSA/ RHS & VA Purchase	Conventional Purchase	Refinancings	Home Improvement Loans
<b>Waterbury</b>	0.26	0.21	0.94	2.10
<b>New Haven-Milford MSA</b>	0.19	0.12	0.54	0.92
<b># of Waterbury Census Tracts with higher ratio than City-wide</b>	17	14	17	15
<b># of Waterbury Census Tracts with lower ratio than City-wide</b>	11	14	11	13

Source: Home Mortgage Disclosure Act Database, US 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 white, non-Hispanic 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, Hispanics, African Americans, and Native Hawaiians/ Pacific Islanders have nearly two to three times the denial-to-approval ratio as non-Hispanic Whites.

## Ratio of Denials to Approvals, by Race and Ethnicity: 2017 New Haven-Milford MSA

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

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

1. Based on primary applicant race & ethnicity

# EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

## Housing Complaints

The range of complaints and inquiries received by the Fair Housing Assistance Program in the last 5 years is reflected in the table below. Complaints with multiple basis 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	--

## 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 of made a finding of discrimination.

# IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The Fair Housing Planning Guide published by HUD categorizes impediments to fair housing choice by public sector, private sector, and public/private sector. The impediments have been placed in these categories, as follows:

## ***Public Sector – City of Waterbury***

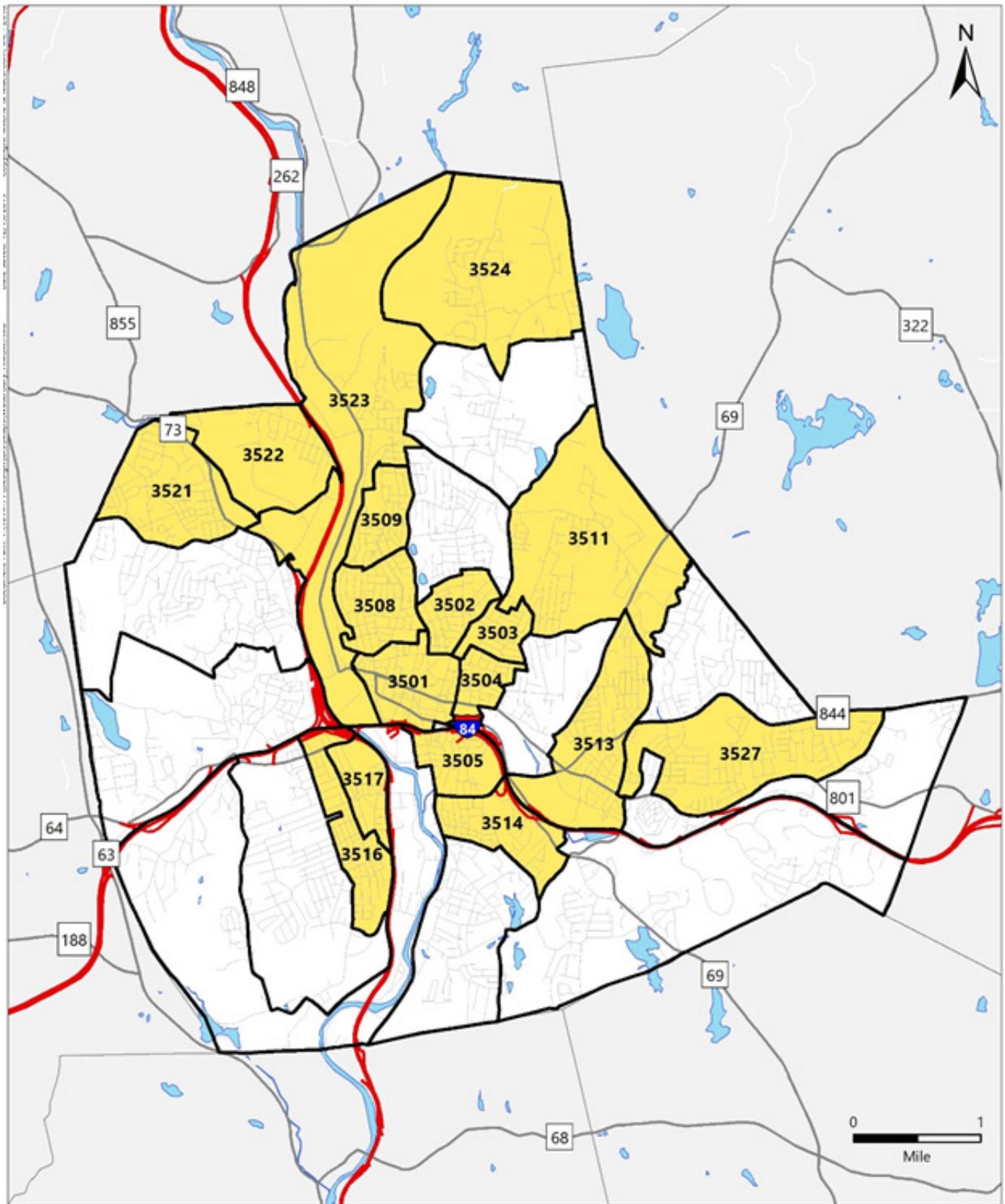
- There is a lack of understanding regarding rights and responsibilities under the Fair Housing Act, and state and local laws.
- Landlords may not be receiving adequate fair housing information.
- The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in non-impacted 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, services, and policy documents.

## ***Public Sector – Housing Authority of the City of Waterbury***

- The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities.
- Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.
- Persons with limited English proficiency are experiencing difficulty accessing housing, and may need translation assistance to access City programs, services, and policy documents.

## ***Private Sector***

- 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.
- Local for-sale and rental housing advertisements include language that may discourage certain members of the protected classes from applying.



Census Tracts with Higher than Average Mortgage Denial Rates: 2017



City of Waterbury  
Community Development Office  
235 Grand St.  
Waterbury, CT 06702  
(203) 597-3444

Census Tracts
  Higher than Average Denial Rates

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


**MILONE & MACBROOM**  
 195 Church St  
 7th Floor  
 New Haven, CT 06510  
 203-344-7887

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

## Public Sector – City of Waterbury

- There is a lack of understanding regarding rights and responsibilities under the Fair Housing Act and state and local 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 able to receive and handle their complaints, or that there is legal advice available to them through the Connecticut Legal Services. Residents could benefit from increased outreach regarding City programs, the local HRC and its powers and responsibilities, and general information on the laws protecting residents from discrimination.
- Landlords may not be receiving adequate fair housing information.
  - Landlords are important stakeholders in providing fair housing choice to members of the 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 the protected classes.
- The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in non-impacted neighborhoods of opportunity.
  - 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 multi-family 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.
- 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 in the City.
- 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, services, and policy documents.
  - While the City employs bi-lingual staff and has a limited policy concerning translation services, the City's substantial and growing Limited English Proficiency (LEP) population likely calls for further accommodation under Title VI of the Civil Rights Act of 1964.

## Public Sector – Housing Authority of the City of Waterbury

- The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities.
  - o Older multi-family structures are commonly considered 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. In light of the age and configuration of the City’s housing stock, persons with mobility impairments are having difficulty finding housing to fit their needs.
- Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.
  - o Certain landlords are not willing to rent their apartments to voucher holders, despite the Source of Income protection in State and local laws. 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.
- Persons with Limited English Proficiency (LEP) are experiencing difficulty accessing housing, and may need translation assistance to access City programs, services, and policy documents.
  - o Two language groups (Spanish and “Other Indo European”) in Waterbury exceed safe harbor minimums. With an increasing number of persons with LEP, the Housing Authority should complete a robust Language Access Plan to ensure these groups have access to public housing.

# 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 purchase 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 that 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 a large population with limited English proficiency. In both of these 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

### ***Public Sector – City of Waterbury***

#### ***Identified Impediment***

There is a lack of understanding regarding rights and responsibilities under the Fair Housing Act and state and local laws.

#### ***Actions for Addressing Impediment***

- The City should update its website to include a fair housing page with basic info and links to HUD and CHRO and special focus on the City’s HRC.
- 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.
- The City should provide training opportunities to HRC members. This could include bringing in CHRO to conduct the training, sending members to training workshops, or contracting with a qualified entity to provide the training inhouse.
- The City should create a small-scale marketing campaign to educate the public about fair housing in general and the HRC in particular. This could be something as simple as a mailer brochure to fit in a business envelope, to PSAs that would run on the local public access channel.
- The City should require fair housing training as part of the CDBG, HOME, and ESG application process. 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.

- The City should 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.
- 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.

### ***Identified Impediment***

There is a lack of understanding regarding rights and responsibilities under the Fair Housing Act and state and local laws.

### ***Actions for Addressing Impediment:***

- 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.

### ***Identified Impediment***

The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in nonimpacted neighborhoods of opportunity.

### ***Actions for Addressing Impediment:***

- The City should collaborate with surrounding municipalities to develop strategies that expand fair housing choice for all residents of the region. The City should support regional fair housing outreach and education initiatives and adopt policies and programs that provide intramunicipal mobility options to members of protected classes and other lower-income residents of the community.
- The City should continue 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.

### ***Identified Impediment***

Poor property maintenance and abandonment in Waterbury limit the availability of decent and safe units within the City's affordable housing stock.

### ***Actions for Addressing Impediment:***

- The City should undertake a rental housing inspection program. The age of housing in 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.

### ***Identified Impediment***

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, services, and policy documents.

#### ***Actions for Addressing Impediment:***

- The Waterbury Community Development Office should conduct a 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 LEP.

## ***Public Sector – Housing Authority of the City of Waterbury***

### ***Identified Impediment***

The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities.

#### ***Actions for Addressing Impediment:***

- The Housing Authority of the City of Waterbury (HACW) should continue the proposed renovations of its housing complexes.

### ***Identified Impediment***

Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.

#### ***Actions for Addressing Impediment:***

- HACW 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.

### ***Identified Impediment***

Persons with limited English proficiency are experiencing difficulty accessing housing and may need translation assistance to access City programs, services, and policy documents.

#### ***Actions for Addressing Impediment:***

- HACW should complete the Language Access Plan.

## ***Private Sector***

### ***Identified Impediment***

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.

#### ***Actions for Addressing Impediment:***

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

### ***Identified Impediment***

Local for-sale and rental housing advertisements include language that may discourage certain members of protected classes from applying.

### ***Actions for Addressing Impediment:***

- The City should recommend in writing to the Republican American that it update its online and print media to include the equal housing logo and a description of the newspaper's policy regarding real estate ads.
- The City should provide a copy of the AI and recommend in writing to the Republican American that it modify its policy regarding rental real estate ads stating "no pets" or ads that seek to restrict or prohibit the types of pets allowed. The newspaper should amend its policy to include the phrase "except companion/service animals permitted under fair housing laws."

