



Waterbury, CT
Analysis of Impediments to Fair Housing Choice

Prepared By:



ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Waterbury, Connecticut

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1. Executive Summary

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. The AI is a review of local regulations and administrative policies, procedures and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, that affect fair housing choice.

Demographic and Housing Trends

The following are some of the key demographic and housing trends which inform the Analysis and its recommendations:

- While the City's population is remaining relatively stable, minority groups are increasing as a share of the total population.
- All racial and ethnic minority groups have poverty rates above 20%, while Whites have a poverty rate of 14.9%.
- Four areas in Waterbury include concentrations of both LMI persons and minorities.
- Female-headed households with children account for more than two-thirds of all families living below the level of poverty in Waterbury.
- Since 2000, housing costs in Waterbury have increased while median household income has decreased, making housing more expensive.
- Black and Hispanic households cannot afford to buy a home at the median sales price.

Impediments and Actions

Demographic trends illustrate the difficulty for racial and ethnic minorities to find decent, affordable housing in Waterbury. The analysis evaluates whether public policies and actions, as well as private actions, create impediments to fair housing choice. The following are some of the key findings and associated actions:

- Public policy documents could be improved from a fair housing perspective. Recommended actions include:
 - Minor zoning changes such as the definition of the family
 - Adding bonus points in WDC scoring systems to improve the funding chances for projects outside racially/ethnically concentrated areas of poverty
 - Increasing the number of times a household can refuse a public housing unit without removal from the wait list
- Residents could benefit from increased fair housing education and outreach. Recommended actions include:
 - Undertaking a small marketing campaign for the City's Human Rights Commission
 - Training landlords and non-profits on fair housing issues
 - Improving online access to fair housing resources
- Housing access could be improved through increased stock of safe, decent and affordable housing. Recommended actions include:
 - Undertaking a rental housing inspection program
 - Completing the Housing Authority's required accessibility improvements

The complete list of impediments and actions are available in Section 9 of this document.

2. Introduction

A. Introduction to the Analysis of Impediments

The City of Waterbury has prepared an Analysis of Impediments to Fair Housing Choice to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a result, the City is charged with the responsibility of conducting their CDBG and HOME programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities, which receive federal funds through the City.

Entitlement communities that receive federal housing funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction;
- Promote fair housing choice for all persons;
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin;
- Promote housing that is accessible to and usable by persons with disabilities; and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI). This document is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials and private citizens must embrace if equality of opportunity is to become a reality.

Under federal law, fair housing choice is defined as the ability of persons of similar income levels, regardless of race, color, religion, sex, disability, familial status, or national origin, to have the same housing choices available. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private);
- The provision of financing assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside impacted areas; and



- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As a federal entitlement community, the City of Waterbury has specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice,
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the jurisdictions' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination in a jurisdiction and working toward its elimination;
- Promoting fair housing choice for all people;
- Providing racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income and housing characteristics by protected classes in the jurisdiction
- Evaluate public and private sector policies that impact fair housing choice
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions or decisions that restrict, or have the effect of restricting, the availability of housing choices based on race, color, religion, sex, disability, familial status or national origin.

This Analysis serves as the basis for fair housing planning; provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates; and assists in building public support for fair housing efforts. The elected governmental body is expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in implementing fair housing initiatives will be judged and recorded.

C. The Federal Fair Housing Act

i. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single-family

housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

ii. What does the Fair Housing Act prohibit?

a. In the Sale and Rental of Housing

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for the sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting), or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

b. In Mortgage Lending

No one may take any of the following actions based on race, color, religion, sex, disability, familial status or national origin:

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

c. Other Prohibitions

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, religion, sex, disability, familial status, or national origin. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

iii. Additional Protections for People with Disabilities

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, has a record of such a disability, or is regarded as having such a disability, a landlord may not:



- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing. For example, a building with a "no pets" policy must make a reasonable accommodation to allow a visually impaired tenant to keep a guide dog.

iv. **Housing Opportunities for Families with Children**

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent or
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

D. **Connecticut Human Rights and Opportunities Act**

The Connecticut Human Rights and Opportunities Act prohibits housing discrimination on the basis of race, color, national origin, religion, sex, familial status, disability status, marital status, ancestry, age, sexual orientation, gender identity or source of income. As a result, persons in Connecticut have greater protection under the State's fair housing law than under the federal Fair Housing Act.

The Human Rights and Opportunities Act establishes the Connecticut Commission on Human Rights and Opportunities (CHRO), which is the enforcement body of the law. Specifically, it is the statutory responsibility of the Commission to undertake the following:

- Enforce human rights laws that ban illegal discrimination in employment, housing, public accommodations and credit transactions.
- Monitor compliance with state contract compliance laws and with laws requiring affirmative action in state agency personnel practices.

- Establish equal opportunity and justice for all persons in Connecticut through education and outreach activities.

CHRO is governed by a nine member volunteer Commission. This policy-making body is composed of five members appointed by the Governor and four members appointed by the Legislative leadership. Agency policy is implemented by a Commission-appointed executive director and agency staff selected in accordance with the State merit system. CHRO has four regional offices – Hartford, Waterbury, Bridgeport and Norwich - which receive and resolve complaints from individuals who believe they have suffered illegal discrimination.

E. Waterbury Human Rights Act

The Waterbury Code of Ordinances establishes the Human Rights Commission (HRC) in Chapter 31, Section 004, and extends protection from discrimination to include marital status, ancestry, age and source of income. If a resident of Waterbury believes they have been discriminated against, they may file a complaint with the HRC, which will investigate and attempt to conciliate the complaint.

The following chart depicts the protected classes of the various fair housing statutes for Waterbury residents.

Figure 2-1
Comparison of Statutory Protections from Housing Discrimination

Protected Class	Federal Fair Housing Act	Connecticut Human Rights and Opportunities Act	Waterbury Human Rights Act
Race	•	•	•
Color	•	•	•
National Origin	•	•	•
Religion	•	•	•
Sex	•	•	•
Familial Status (families with children under age 18)	•	•	•
Handicap/Disability Status	•	•	•
Marital Status		•	•
Ancestry		•	•
Age		•	•
Source of Income		•	•
Sexual Orientation		•	
Gender Identity		•	

F. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below along with a summary of the features within each category or a direct link to the detailed standards.

i. Fair Housing Act

These standards are listed in section D.iii. above.

ii. Americans with Disabilities Act (ADA)

ADA standards are required for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990. A complete description of the guidelines can be found at www.ada.gov/stdspdf.htm.

iii. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for Federal and federally funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov/ufas/ufas-html/ufas.htm.

iv. Visitability Standards

The term “visitability” refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance,
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor big enough to get into in a wheelchair, and close the door.

v. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)
- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size).

G. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair housing Choice. M&L utilized a comprehensive approach involving the City of Waterbury. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract and municipal level. Generally, data available as of November, 2012 was utilized in this report.

- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Consolidated Plans, Annual Plans and CAPERs from the City of Waterbury
- Fair housing complaints filed with HUD and CHRO
- Real estate advertisements
- 2010 dissimilarity indexing for the City as calculated by Mullin & Lonergan Associates
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes

H. Using Census Data

Data from varying years are provided throughout the analysis. In most instances, the type of analysis presented dictated the date and source of data used. For example, for overall analyses of total City characteristics such as population, it was possible and practical to use decennial census data from 1960 through 2010. However, in most cases involving analysis at the census tract level, data from 2000 and 2010 were used; data from earlier decennial censuses would not have been comparable due to the changes in census tract boundaries over the decades. In all cases, the most current data available at the time this report was drafted was utilized.

I. Development of the AI

i. Lead Agency

The Waterbury Development Corporation (WDC) was responsible for the preparation and implementation of the AI. Staff from the WDC identified and invited numerous stakeholders to participate in the process for the purpose of developing a thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

ii. Agency Consultation

WDC engaged in an extensive consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were emailed to many of the interviewees.

On January 14-16, 2013, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate. A list of organizations interviewed is included below.

Figure 2-2
List of Organizations Interviewed

Organizations Interviewed	
Ability Beyond Disability	Neighborhood Housing Services of Waterbury, Inc.
City of Waterbury	The Greater Waterbury Board of REALTORS, Inc.
Connecticut Legal Services Corporation for Supportive Housing	United Way of Greater Waterbury
CREDO Housing Development Corporation, Inc.	Waterbury Arc
Grace Development Corporation of Waterbury, Inc.	Waterbury Development Corporation
Literacy Volunteers of Greater Waterbury	Waterbury Housing Authority
Loyola Development Corporation	Waterbury Human Rights Commission
NAACP Greater Waterbury Branch	WOIC

J. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In Connecticut and Waterbury, this protection is extended to additional groups. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in counties and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

3. Demographic Information

A. Demographic Profile

i. Population Trends

Waterbury is located in New Haven County, Connecticut, and is part of the New Haven-Milford, CT Metropolitan Statistical Area (MSA) which had a population of 862,477 in 2010. The MSA is part of the New York-Newark-Bridgeport, NY-NJ-CT-PA Combined Statistical Area which is the largest in the United States with a population of 22,085,649 in 2010. With a 2010 population of 110,366 residents, Waterbury is the fifth most populous city in Connecticut, behind Bridgeport, New Haven, Hartford and Stamford.

Regional Population Trends

Trends in Waterbury over the past four decades indicate a relatively stable population. Between 1970 and 2010, the City’s population fell in the 1970s and 1990s, but grew in the 1980s and 2000s. From 1970 to 2010, the City’s population grew by less than 3,000 people, or 2.2%. In comparison, New Haven County and Connecticut as a whole have grown consistently since 1970, having grown by 15.8% and 17.9%, respectively during that time.

Figure 3-1 below shows the change in population in the State, County and City from 1970 to 2010. Figure 3-2 shows the percent change in population compared to the 1970 population, showing slower growth in Waterbury as compared to the County and the State.

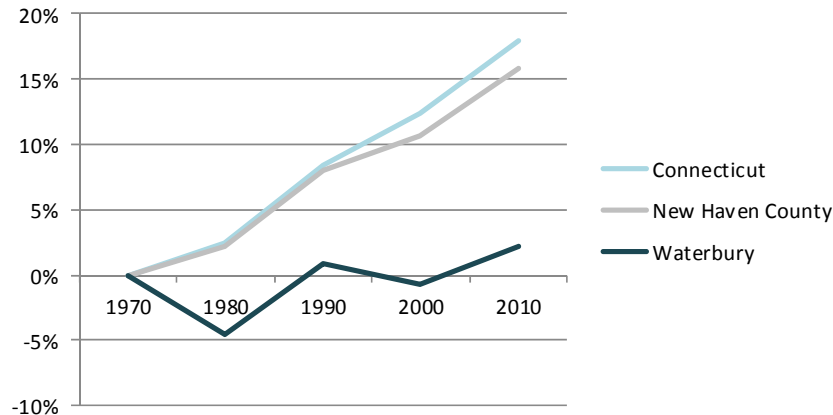
Figure 3-1
Population Trends, 1970-2010

	1970	1980	% Change in Population		% Change in Population		% Change in Population		% Change in Population	
			1970-1980	1990	1970-1990	2000	1970-2000	2010	1970-2010	2000-2010
Connecticut	3,032,217	3,107,564	2.4%	3,287,116	8.4%	3,405,565	12.3%	3,574,097	17.9%	4.9%
New Haven County	744,948	761,325	2.2%	804,219	8.0%	824,008	10.6%	862,477	15.8%	4.7%
Waterbury	108,033	103,266	-4.6%	108,961	0.9%	107,271	-0.7%	110,366	2.2%	2.9%

Source: U.S. Census Bureau, 2000 Census (SF 1, P1), 2010 Census (SF1, P1); 1990 Census Historic Population Counts



Figure 3-2
Percent Change from 1970 Population, 1970-2010



Source: U.S. Census Bureau, 2000 Census (SF 1, P1), 2010 Census (SF1, P1); 1990 Census Historic Population Counts

Population Change within Waterbury

Population change has not been even across Waterbury. By mapping population changes at the census tract level, data shows where growth and decline are occurring in the City.

Census data from 2000 and 2010 show that the southern half of Waterbury has grown fastest while central communities have lost significant population. Western areas have also lost up to 7% of their population since 2000. Map 3-1 on the following page shows population change by census tract in the City.



Waterbury’s population has stayed relatively stable, increasing 2.2% between 1970 and 2010; however, central and western areas of the City have lost population.

The City’s rate of growth is slower than New Haven County and Connecticut as a whole. On a census tract level, several areas have experienced significant population gain while others have lost residents.

ii. Racial and Ethnic Trends

Increasing Racial Diversity

Waterbury’s population became increasingly diverse between 2000 and 2010. While the City’s overall population increased 2.9%, the White population decreased 9.9%. In comparison, the non-White population increased 29.1%. Hispanics led the minority increase with 47.5% growth in the last decade. Similarly, the Other Race population, Two or More Race population, and Black population increased 33.4%, 29.9% and 26.5%, respectively.



Waterbury’s increasing diversity reflects national trends of minority population growth, although minority growth within the City is occurring at faster rates than the nation as a whole in most categories (excepting the Asian and Other Race categories).

Hispanic Population Growth

Within overall minority population growth, Hispanic growth has been notably high. The City’s racial minorities increased by more than 10,000 people in the last decade while the City’s Hispanic population (counted independently of race) increased by more than 11,000 people. As a share of total population, Hispanics increased from 21.8% of the City’s population to 31.2%. The next largest increase in share of total population was the Black population which increased from 16.3% to 20.1% of the population. Figure 3-3 shows the racial and ethnic composition of the City.

Figure 3-3
Population by Race and Ethnicity in Waterbury, 2000-2010

	2000		2010		% Change 2000-2010
	#	%	#	%	
Total	107,271	100.0%	110,366	100.0%	2.9%
White	72,018	67.1%	64,864	58.8%	-9.9%
Non-White	35,253	32.9%	45,502	41.2%	29.1%
Black	17,500	16.3%	22,138	20.1%	26.5%
American Indian	453	0.4%	626	0.6%	38.2%
Asian/Pacific Islander	1,676	1.6%	2,027	1.8%	20.9%
Some Other Race	11,698	10.9%	15,610	14.1%	33.4%
Two or More Races	3,926	3.7%	5,101	4.6%	29.9%
Hispanic*	23,354	21.8%	34,446	31.2%	47.5%

*Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, Census 2000 Redistricting Data, Census 2010 Redistricting Data



As a share of total population, Hispanics increased from 21.8% of the City’s population to 31.2%.

While all minority groups increased their share of the total population in Waterbury, Whites fell from 67.1% to 58.8%. All other racial groups increased significantly.

iii. Areas of Racial and Ethnic Minority Concentration

Defining Racial and Ethnic Concentration

The City defines an area of racial or ethnic concentration as one in which the minority population share is 20% higher than the group’s citywide average. For



instance, Hispanics comprise 31.2% of the City's total population. An area of Hispanic concentration would be a census tract in which 51.2% of residents are Hispanics.

Areas of Racial and Ethnic Concentration

Within Waterbury in 2010, Blacks accounted for 20.1% of the City's population. Based on the stated definition, an area of Black concentration would include any census tract where the percentage of Black residents is 40.1% or higher. One census tract meets this criterion. No other single racial group meets the threshold of an area of concentration.

Hispanic residents represent almost one third of the City's population, or 31.2%. An area of ethnic concentration would include any census tract in which the percentage of Hispanics is 51.2% or higher. Three census tracts meet this criterion.

None of the identified areas overlapped to be an area of more than one ethnic or racial concentration. Figure 3-4 shows the racial and ethnic composition of all census tracts in Waterbury with areas of concentration highlighted in light blue. The identified areas of concentration are shown on Map 3-2 on the following page.



Figure 3-4
Areas of Racial and Ethnic Concentration, 2010

Census Tract	% White	% Black	% AIAN	% Asian	% Hispanic
Waterbury	58.8%	20.1%	0.6%	1.8%	31.2%
Area of Concentration Threshold	-	40.1%	20.6%	21.8%	51.2%
Census Tract 3501	44.2%	23.6%	1.0%	2.3%	54.3%
Census Tract 3502	28.4%	38.9%	1.1%	0.7%	49.3%
Census Tract 3503	25.4%	42.6%	0.5%	0.0%	47.7%
Census Tract 3504	28.8%	36.5%	1.0%	0.4%	52.4%
Census Tract 3505	43.7%	12.6%	0.4%	3.5%	64.1%
Census Tract 3508	44.4%	26.6%	0.5%	1.0%	43.3%
Census Tract 3509	55.4%	28.3%	0.6%	1.0%	22.6%
Census Tract 3510	53.2%	25.1%	0.4%	1.9%	35.4%
Census Tract 3511	43.9%	36.8%	0.4%	2.2%	25.9%
Census Tract 3512	40.1%	31.4%	0.7%	1.1%	46.9%
Census Tract 3513	59.6%	17.5%	0.7%	2.5%	31.1%
Census Tract 3514	48.6%	18.3%	0.7%	2.0%	49.9%
Census Tract 3515	64.8%	13.7%	0.4%	1.6%	28.7%
Census Tract 3516.01	74.6%	11.6%	0.8%	1.0%	21.7%
Census Tract 3516.02	83.9%	6.7%	0.3%	2.2%	11.4%
Census Tract 3517	47.9%	23.3%	1.5%	0.6%	43.5%
Census Tract 3518	75.8%	12.0%	0.8%	2.3%	15.3%
Census Tract 3519	75.9%	14.4%	0.2%	2.7%	11.5%
Census Tract 3520	80.6%	9.0%	0.2%	2.3%	13.9%
Census Tract 3521	68.2%	16.6%	0.4%	1.5%	22.1%
Census Tract 3522	39.8%	28.6%	0.4%	1.3%	49.3%
Census Tract 3523	54.0%	25.5%	0.7%	0.7%	30.3%
Census Tract 3524	55.3%	22.8%	0.7%	1.9%	33.8%
Census Tract 3525	65.1%	18.3%	0.4%	1.8%	22.1%
Census Tract 3526	69.8%	15.8%	0.7%	3.5%	19.7%
Census Tract 3527.01	76.0%	10.4%	0.5%	1.7%	18.8%
Census Tract 3527.02	72.7%	14.9%	0.1%	2.2%	20.5%
Census Tract 3528	62.4%	17.6%	0.5%	2.1%	27.7%

Areas of Concentration are highlighted in light blue.

Source: U.S. Census Bureau, 2010 Census (SF1, P3 and P4).





In the City of Waterbury, four census tracts have concentrations of minority persons.

Three census tracts have concentrations of Hispanics and one census tract has a concentration of Blacks.

iv. Residential Segregation Patterns

Defining Segregation

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower-income, minority inner-city neighborhoods.

The Effects of Segregation

Latent factors, such as attitudes, or overt factors, such as real estate practices, can limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high.¹ Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates and increased homicide rates.

Measuring Segregation

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.² The index is typically interpreted as the percentage of a minority population that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

¹ This aspect of segregation is related to the degree to which members of a group reside in areas where their group predominates, thus leading them to have less residential contact with other groups. See: Fossett, Mark. "Racial Segregation in America: A Nontechnical Review of Residential Segregation in Urban Areas." Department of Sociology and Racial and Ethnic Studies Institute, Texas A&M University, 2004.

² The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to $1/2 \sum ABS [(b/B)-(a/A)]$, where b is the subgroup population of a census tract, B is the total subgroup population in a city, A is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.



Segregation in Waterbury

Dissimilarity indices in the following chart show that Waterbury has low levels of segregation between Whites and almost all minority populations based on 2010 data. The Other Race category is the exception, with a 32.7 rating, indicating a moderate level of segregation. The data indicates, for instance, that in order to achieve full integration, 27.9% of Hispanics would have to move elsewhere within the City. In addition to these populations, the City has a White-Black index of 28.9, a White-Asian index of 14.3, and a White-multi race index of 22.9. In cases where the subgroup population is small, such as with the American Indian/Alaska Native population, the dissimilarity index may be high even if the group's members are evenly dispersed.

Figure 3-5 illustrates the 2000 and 2010 dissimilarity index rankings for Waterbury.

Figure 3-5
Dissimilarity Index Rankings, 2000 and 2010

	2000			2010		
	DI with White Population	Population	% of Total Population	DI with White Population	Population	% of Total Population
White	---	72,018	67.1%	---	64,864	50.8%
Black	40.5	17,500	16.3%	28.9	22,138	16.3%
American Indian/Alaska Native	34.9	453	0.4%	25.4	626	0.5%
Asian	18.1	1,676	1.6%	14.3	2,027	17.0%
Other	45.1	11,698	10.9%	32.7	15,610	10.7%
Two or more races	29.7	3,926	3.7%	22.9	5,101	4.8%
Hispanic*	38.5	23,354	21.8%	27.9	34,446	24.2%
Total	---	107,271	100.0%	---	110,366	100.0%

Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic areas to create a completely even demographic distribution in the City

*Hispanic ethnicity is counted independently of race.

Source: US Census Bureau, 2000 Census (P3 and P4), 2010 Census (P3 and P4); Calculations by Mullin & Lonergan Associates

Changing Patterns of Segregation

Since 2000, every dissimilarity index in the City has dropped. The White-Asian index showed the smallest drop at 3.8, but already was the lowest ranking in 2000. The White-Black population showed the largest increase in integration, with its dissimilarity index decreasing 11.6 points. The White-Hispanic index had the second-largest drop, decreasing 10.6 points between 2000 and 2010.



Evidence shows that Waterbury is becoming more integrated as its population increases and diversifies.

Between 2000 and 2010, White-Black segregation decreased 11.6 points and White-Hispanic segregation decreased 10.6 points.



v. Race/Ethnicity and Income

Citywide Median Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or rental lease. In Waterbury in 2011, the Citywide median household income was \$41,499, representing the second-lowest median income for any city or borough in New Haven County in 2011, and the fifth-lowest median income in Connecticut.

Median Income and Poverty

In Waterbury, the median household income for Asians and Whites was higher than for Blacks and Hispanics. In 2011, Asians households had the highest median household income of \$53,345 while Whites had the second highest at \$46,867. Black households, with a median income of \$37,318, earned only 80% of the White median household income, and the Hispanic median household income of \$27,207 was equivalent to 58.1%.

As suggested by the lower median incomes among Blacks and Hispanics, minority residents in Waterbury experienced poverty at greater rates than White residents. As shown in Figure 3-6, the Black, Hispanic, Asian, Two or More Races, and Other Race populations all have poverty rates above 20%. Notably, while the Asian population had the highest median family income, it also had a poverty rate equal to the Black population, which had a significantly lower MHI. The highest poverty rate was that of the Other Race population (38.7%), which also had the lowest median household income.³

Figure 3-6
Median Household Income and Poverty Rates by Race/Ethnicity, 2010

	Median Household Income	Poverty Rate
Waterbury, CT	\$41,499	20.6%
White	\$46,867	14.9%
Black	\$37,318	21.6%
American Indian*	\$11,326	40.2%
Asian	\$53,345	21.6%
Some Other Race	\$25,617	38.7%
Two or More Races	\$36,216	28.2%
Hispanic**	\$27,207	36.9%

*Note: sample size for this racial category is less than 1,000.

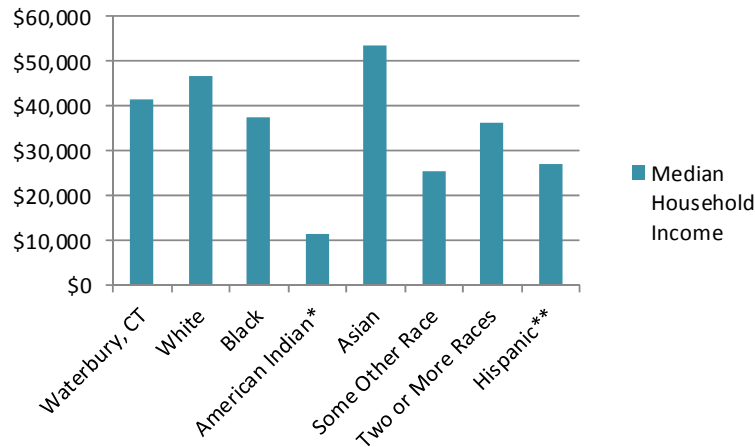
**Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, 2007-11 American Community Survey (B19013, B19013A, B19013B, B19013C, B19013D, B19013F, B19013G, B19013I, B17001, B17001A, B17001B, B17001C, B17001D, B17001F, B17001G, B17001I)

³ The American Indian/Alaska Native population group was excluded from this analysis because the sample size was too small for accurate estimates.



Figure 3-7
Median Household Income by Race/Ethnicity, 2010



*Note: sample size for this racial category is less than 1,000.

**Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, 2007-11 American Community Survey (B19013, B19013A, B19013B, B19013C, B19013D, B19013F, B19013G, B19013I, B17001, B17001A, B17001B, B17001C, B17001D, B17001F, B17001G, B17001I)



Hispanics and Other Race populations experienced poverty rates above 35% in 2011, while Whites had a poverty rate of 14.9%.

All minority racial and ethnic categories had poverty rates above 20% in 2011.

Income Distribution

Among all households in Waterbury, distribution across income brackets correlates with data on poverty and MHI, as shown in Figure 3-8. The Other Race, Hispanic, Two or More Race, and Black populations were the most likely to earn less than \$25,000. The Asian and White populations were the most likely to earn more than \$75,000. Additionally, Asians were less likely to make \$25,000 to \$49,999, confirming a large income gap within that population group and supporting the group's high MHI and high poverty rate.

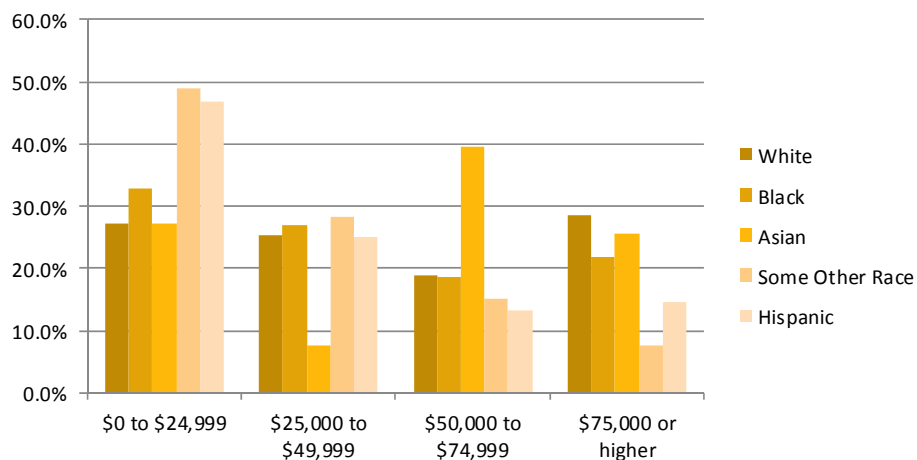


Figure 3-8
Household Income Distribution by Race, 2010

	Total Households	\$0 to \$24,999	%	\$25,000 to \$49,999	%	\$50,000 to \$74,999	%	\$75,000 or higher	%
Total	42,599	13,505	31.7%	10,839	25.4%	7,963	18.7%	10,292	24.2%
White	26,973	7,348	27.2%	6,852	25.4%	5,064	18.8%	7,709	28.6%
Black	7,680	2,526	32.9%	2,062	26.8%	1,425	18.6%	1,667	21.7%
American Indian	69	58	84.1%	0	0.0%	11	15.9%	0	0.0%
Asian	660	180	27.3%	51	7.7%	261	39.5%	168	25.5%
Some Other Race	5,546	2,712	48.9%	1,568	28.3%	843	15.2%	423	7.6%
Two or More Races	1,650	681	41.3%	306	18.5%	338	20.5%	325	19.7%
Hispanic	10,720	5,029	46.9%	2,698	25.2%	1,422	13.3%	1,571	14.7%

Source: U.S. Census Bureau, 2007-11 American Community Survey (B19001A, B19001B, B19001C, B19001D, B19001E, B19001F, B19001G, B19001I)

Figure 3-9
Household Income Distribution by Income Level, 2010



Source: U.S. Census Bureau, 2007-11 American Community Survey (B19001A, B19001B, B19001C, B19001D, B19001E, B19001F, B19001G, B19001I)



Other Race, Hispanic, Two or More Race, and Black populations were more likely than Whites and Asians to have annual incomes of less than \$25,000.

In Waterbury, more than 40% of the Other Race, Hispanic, and Two or More Race populations earned less than \$25,000 in 2011.



vi. Concentrations of LMI Persons

Concentrations of LMI Persons

The Community Development Block Grant (CDBG) program includes a statutory requirement that at least 70% of funds invested benefit low and moderate income (LMI) persons. As a result, the U.S. Department of Housing and Urban Development (HUD) provides the percentage of LMI persons in each census block group for entitlements such as Waterbury. HUD 2012 LMI estimates reveal that 56 of the 82 census block groups across Waterbury had at least 51% of residents meeting the definition for LMI status.

Map 3-3 illustrates areas of LMI concentration and areas of racial/ethnic concentration in Waterbury.

Racially/Ethnically Concentrated Areas of Poverty

Areas in which LMI concentrations overlap with racial and ethnic concentrations are considered racially/ethnically concentrated areas of poverty (RCAP/ECAPs). Of those previously identified areas of racial and ethnic concentration, all four overlap with areas of Low-to-Moderate Income. All of these areas are located in the center of the City, in and around downtown Waterbury.

Map 3-4 illustrates the RCAP/ECAPs in the City. It is within these RCAP/ECAPs that housing, income, and other characteristics will be analyzed.



Four areas in Waterbury include concentrations of both LMI persons and minorities.

Census tracts 3501, 3503, 3504 and 3505 are racially/ethnically concentrated areas of poverty.

vii. Disability and Income

Defining Disability

As defined by the Census Bureau, a disability is a long-lasting physical, mental or emotional condition that can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. The Fair Housing Act prohibits discrimination based on physical, mental or emotional handicap, provided “reasonable accommodation” can be made. Reasonable accommodation may include changes to address the needs of disabled persons, including adaptive structural (e.g., constructing an entrance ramp) or administrative changes (e.g., permitting the use of a service animal).

Disability in Waterbury

In 2010, 15.2% of all Waterbury residents had at least one disability. Trends show the likelihood of having a disability generally increases with age. Of Waterbury residents over the age of 75, 55.8% have at least one disability.



Median Income and Poverty

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. As seen in Figure 3-10, disabled individuals under the age of five were most likely to live in poverty. In this age group, 78.6% of those with at least one disability were living in poverty. Individuals with disabilities, age 5 to 17 had the second-highest rate of poverty at 47.6%.

Map 3-5 on the following page illustrates the census tracts with higher percentages of residents reporting a disability in Waterbury. Those residents are largely concentrated in the center of the City, as well as areas north and east. The largest concentration of residents with a disability is also an ethnically concentrated area of poverty.

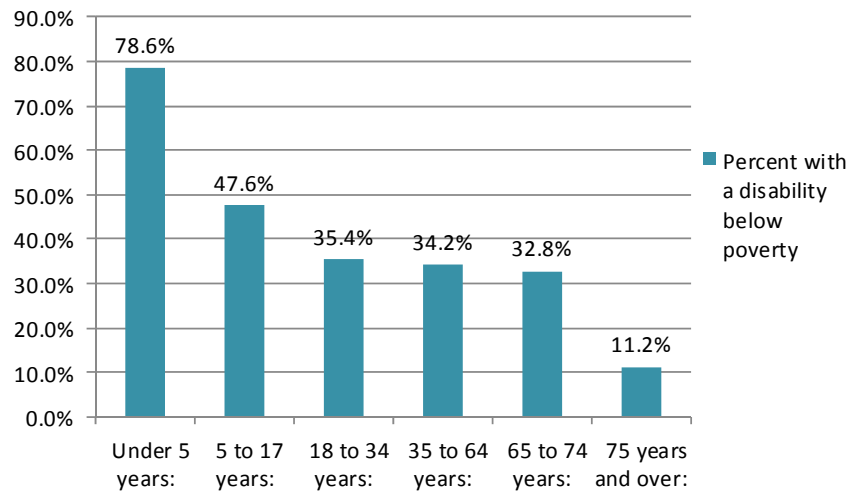
Figure 3-10
Disability Status by Age, 2010

	Waterbury, Connecticut
Total:	108,218
Under 5 years:	7,582
With a disability:	42
Percent with a disability below poverty	78.6%
5 to 17 years:	19,916
With a disability:	1,560
Percent with a disability below poverty	47.6%
18 to 34 years:	26,443
With a disability:	1,748
Percent with a disability below poverty	35.4%
35 to 64 years:	41,753
With a disability:	7,703
Percent with a disability below poverty	34.2%
65 to 74 years:	6,433
With a disability:	2,000
Percent with a disability below poverty	32.8%
75 years and over:	6,091
With a disability:	3,396
Percent with a disability below poverty	11.2%

Source: U.S. Census Bureau, 2009-11 American Community Survey (B18130)



Figure 3-11
Percent of Residents with a Disability Living in Poverty by Age Group, 2011



Source: U.S. Census Bureau, 2009-11 American Community Survey (B18130)



Of individuals with at least one disability, the rate of poverty decreased with age.

While the percent of people with a disability increased with age, the percent of people with a disability living in poverty decreased. Those individuals under five years old had the highest rate of poverty at 78.6% while those age 75 and older had the lowest rate at 11.2%.

viii. Familial Status and Income

Defining Family

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one-to-four units, it is unlawful to refuse to rent or sell to families with children.



Families in Waterbury

Between 2000 and 2010, the proportion of female-headed households in Waterbury increased 23.9%, and female-headed households with children increased 25%. Similarly, the proportion of male-headed households with children increased 10.1% during the decade. By comparison, married couple family households with children declined 13.8% during the same period. Overall, family households increased 0.3%, while nonfamily households decreased 0.9%.

Figure 3-12
Households by Type and Presence of Children, 2000-2010

		2000	2011	% Change 2000-2010
Total Households		42,655	42,599	-0.1%
Family Households		27,005	27,093	0.3%
Married Couple Families	Total	17,007	15,087	-11.3%
	With own children under 18 years	7,325	6,317	-13.8%
	No own children under 18 years	9,682	8,770	-9.4%
Other Families		9,998	12,006	20.1%
Male Householder (no wife)	Total	1,908	1,984	4.0%
	With own children under 18 years	912	1,004	10.1%
	No own children under 18 years	996	980	-1.6%
Female Householder (no husband)	Total	8,090	10,022	23.9%
	With own children under 18 years	5,246	6,556	25.0%
	No own children under 18 years	2,844	3,466	21.9%
Nonfamily		15,650	15,506	-0.9%

Source: US Census Bureau, Census, 2000 (SF 3 P10); 2007-11 American Community Survey (B11001, B11003)

Families in Poverty

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. In Waterbury, female-headed households with children comprised 24.2% of all families in 2011, and 44.2% of those female-headed households lived below the poverty level. Female-headed households with children comprised 71% of all families living in poverty in Waterbury in 2010.⁴

⁴ U.S. Census Bureau, 2007-11 American Community Survey (B17012).





Female-headed households with children accounted for more than two-thirds of all families living below the level of poverty in Waterbury.

Female-headed households with children comprised 71% of all families living in poverty and were five and a half times as likely to live in poverty as married couple families with children.

ix. Ancestry and Income

Foreign-Born Residents of Waterbury

It is illegal to refuse housing based on place of birth or ancestry. Census data on native and foreign-born populations revealed 14.5% of the City's residents in 2011 were foreign-born.⁵ Foreign-born populations can be susceptible to discrimination due to language or cultural barriers. Additionally, these residents may not know their rights concerning fair housing choice or the appropriate legal channels to address discriminatory actions.

Of the foreign-born population including native residents born outside the United States, 24.8% live in poverty compared to 20.6% of people in poverty in the City as a whole.

x. Persons with LEP

Defining LEP

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

Language Groups in Waterbury

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In Waterbury, there were 13,472 persons who spoke English less than "very well" in 2011, representing 13.2% of the population over five years old. Just over 64% of those who spoke English less than very well were native Spanish speakers. This represents 8.5% of the City's total population over five years old.

⁵ U.S. Census Bureau, 2006-10 American Community Survey (B06012)



In Waterbury, more than 1,000 native Spanish speakers and native Portuguese speakers have LEP, as reported in Figure 3-13. Additionally, more than 1,000 people identified as having LEP with a native “other Indo-European language.” This category may be a combination of many smaller, Indo-European languages or a concentration of another language group not classified by the Census. According to stakeholders, a large Albanian-speaking population exists and may account for this number. All three of these language groups warrant further evaluation to determine their ability to access City services.

Figure 3-13
Language Spoken at Home by Ability to Speak English, 2010

Language Spoken	Number of Persons with LEP	Percent of Total Population
Total Persons with LEP	13,472	13.2%
Spanish	8,651	8.5%
Portuguese	1,348	1.3%
Other Indo-European Languages	1,316	1.3%

Source: US Census Bureau, 2007-11 American Community Survey (B16001)



In Waterbury, 13,472 residents had limited English proficiency (LEP) in 2011.

Just over 64% of persons with LEP were native Spanish speakers, representing 8.5% of the total population age five and older.

xi. Protected Class Status and Unemployment

Unemployment in Waterbury

In 2011, unemployment in Waterbury was 12.7%, which was higher than the statewide rate of 8.5% for the population age 16 years and older, and higher than the County rate of 9.3%.⁶

American Community Survey estimates spanning recent years provide detailed data by gender and race, indicating some differences in employment rates among groups. Women experienced unemployment at lower rates than men, with 10.7% of women unemployed compared to 12.5% of men. Across the City, unemployment rates were higher among racial minorities, with unemployment rates at 18.6% for Some Other Race residents, 17.1% for Blacks, 16% for Two or More Race residents, and 15.1% for Hispanics. Asians had the lowest unemployment rate among any single racial or ethnic group, at 7.1%.

⁶ US Census Bureau, 2007-11 American Community Survey (S2301)



Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses. The Black, Hispanic, Other Race, and Two or More Races populations are likely to have the least amount of disposable income for other expenses. Figure 3-14 illustrates this data.

Figure 3-14
Civilian Labor Force, 2010

	Total	In labor force	Employed	Unemployment rate
Population 16 years and over	84,738	63.7%	55.5%	12.7%
RACE AND HISPANIC OR LATINO ORIGIN				
White	52,949	63.3%	56.8%	10.1%
Black or African American	15,568	65.1%	53.7%	17.1%
American Indian and Alaska Native	147	76.9%	71.4%	7.1%
Asian	1,442	79.8%	72.3%	9.4%
Some Other Race	11,281	62.0%	50.5%	18.6%
Two or More Races	3,284	62.5%	52.6%	16.0%
Hispanic or Latino origin (of any race)	21,771	64.0%	54.3%	15.1%
Population 20 to 64 years	63,947	76.8%	67.8%	11.6%
SEX				
Male	29,701	82.8%	72.2%	12.5%
Female	34,246	71.6%	64.0%	10.7%
Females with own Children	6,243	71.4%	61.8%	13.4%

Source: US Census Bureau, 2007-11 American Community Survey (S2301)



With the exception of Asian residents, minorities were more likely to be unemployed than White residents in Waterbury.

Unemployment among Blacks was 17.1% and 18.6% among persons of Some Other Race. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.

B. Housing Market

In general, the housing market has expanded slowly since 2000, with 1,164 new units constructed through 2010, representing a 2.5% increase; however, the increase has not been uniform across Waterbury. Housing has increased quickly in the southern half of the City while central areas have lost housing units.

i. Housing Inventory

Housing in Waterbury

The housing stock in Waterbury has expanded since 2000. Between 2000 and 2010, the net change in housing stock was 1,164 units, an increase of 2.5%. The



largest percent gain for a census tract was tract 3519 in the City's southern half, which increased 20%, while the fastest decrease was tract 3502, which lost 5.1% of its housing inventory.

The figures below show the change in housing units for the City as a whole and for individual census tracts. Map 3-6 on the following page shows the percent change in housing units by census tract, revealing that the largest decreases occurred in the City's center and the largest increases were in the southern parts of the City. Racially/ethnically concentrated areas of poverty either lost housing units in the last decade or were in the slowest growth category.

Figure 3-15
Trends in Housing Inventory, 2000-2010



Census Tract	Total Units, 2000	Total Units, 2010	Percent Change
Waterbury	46,827	47,991	2.5%
Census Tract 3501	2,731	2823	3.4%
Census Tract 3502	1,542	1463	-5.1%
Census Tract 3503	939	893	-4.9%
Census Tract 3504	1,252	1,191	-4.9%
Census Tract 3505	1,046	1062	1.5%
Census Tract 3508	2,362	2,455	3.9%
Census Tract 3509	704	708	0.6%
Census Tract 3510	1,446	1,466	1.4%
Census Tract 3511	1,858	1908	2.7%
Census Tract 3512	1,590	1544	-2.9%
Census Tract 3513	2,322	2315	-0.3%
Census Tract 3514	1,569	1669	6.4%
Census Tract 3515	1,962	1985	1.2%
Census Tract 3516.01	1,493	1544	3.4%
Census Tract 3516.02	2,926	3003	2.6%
Census Tract 3517	1,357	1376	1.4%
Census Tract 3518	1,991	2090	5.0%
Census Tract 3519	724	869	20.0%
Census Tract 3520	1,825	1902	4.2%
Census Tract 3521	1,703	1741	2.2%
Census Tract 3522	941	950	1.0%
Census Tract 3523	1,222	1260	3.1%
Census Tract 3524	1,241	1260	1.5%
Census Tract 3525	1,281	1318	2.9%
Census Tract 3526	2,308	2,349	1.8%
Census Tract 3527.01	1,596	1,644	3.0%
Census Tract 3527.02	2,374	2471	4.1%
Census Tract 3528	2,522	2732	8.3%

Source: U.S. Census Bureau, 2000 Census (SF1, H1), 2010 Census (SF1, H1)



The housing inventory in Waterbury increased 2.5% between 2000 and 2010.

While many tracts experienced increases, the tracts in the City’s core lost housing units, including three RCAPs/ECAPs.



ii. Types of Housing Units

Housing Types in Waterbury

In 2010, the American Community Survey reported there were 48,426 occupied housing units in the City. Of these, 27,094, or 55.9%, were multi-family units and 21,275, or 43.9%, were single-family units. Additionally, 0.1% of the housing stock consisted of mobile homes. Figure 3-16 details the City's housing stock. As the table is based on five-year ACS estimates, in order to obtain details at the local level, the Citywide total differs from the total number of units counted in the 2010 Census data (100% count).

The maps on the following pages show census tracts with the most multi-family units and those census tracts with the most multi-family units as a percent of all units. The City's center has the highest number of multi-family units of any census tract, despite being a relatively small area. RCAP/ECAPs have the highest percentages of multi-family units, with some tracts consisting of more than 95% multi-family structures. As such, multi-family units are heavily concentrated in the City's center and in racially/ethnically concentrated areas of poverty. Some of the areas of the fastest population growth and fastest housing unit growth, in the southern half of the City, also have the lowest number of multi-family units.

Figure 3-16
Units in Structure, 2010

	Total:	Total Single-Family	1, detached	1, attached	Total Multi-Family	2 to 4	5 to 9	10 to 19	20 or more	Mobile home	Boat, RV, van, etc.
Waterbury	48,426	21,275	18503	2772	27,094	13,994	4,600	3,467	5,033	57	0
% of total	---	43.9%	87.0%	13.0%	55.9%	51.6%	17.0%	12.8%	18.6%	0.1%	---

Source: U.S. Census Bureau, 2007-11 American Community Survey (B25024)

iii. Protected Class Status and Home Ownership

The Benefits of Homeownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."⁷

Minorities and Homeownership

Historically, minorities tend to have lower homeownership rates than Whites. In Waterbury, 60.1% of White households owned their homes in 2010, while most minorities had significantly lower homeownership rates. The Other Race category had the lowest homeownership rate at 20.4%, followed by Hispanics with a rate of 26.8%. Among minorities, Blacks had the highest rate at 37.7%; however, this rate was more than 20% less than the homeownership rate for Whites. Figure 3-17 illustrates homeownership by race in Waterbury.

⁷ Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinee K. Kuty (New York: Routledge 2008) p. 82.



Figure 3-17
Homeownership by Race, 2010

	Total		White		Black		Asian		Some Other Race		Two or More Races		Hispanic	
	Total	Owner occupied	Total	Owner occupied	Total	Owner occupied	Total	Owner Occupied	Total	Owner occupied	Total	Owner occupied	Total	Owner occupied
Waterbury	42,599	49.6%	26,973	60.1%	7,680	38.7%	660	37.7%	5,546	20.4%	1,650	32.7%	10,720	26.8%

Source: U.S. Census Bureau, 2006-10 American Community Survey (B25003, B25003A, B25003B, B25003C, B25003D, B25003F, B25003I)



Blacks had a homeownership rate 20 percentage points lower than Whites, despite having the highest homeownership rate of all minority groups.

Blacks had a homeownership rate of 37.7% while Whites had a homeownership rate of 60.1%. Other Race residents and Hispanics had the lowest homeownership rates at 20.4% and 26.8%, respectively.

Map 3-9 on the following page shows areas of high homeownership among Whites, Blacks and Hispanics. Generally, areas of high homeownership are on the periphery of the City. Among the three groups, Whites have the most areas of high homeownership rates, while Blacks and especially Hispanics have fewer areas of high homeownership.

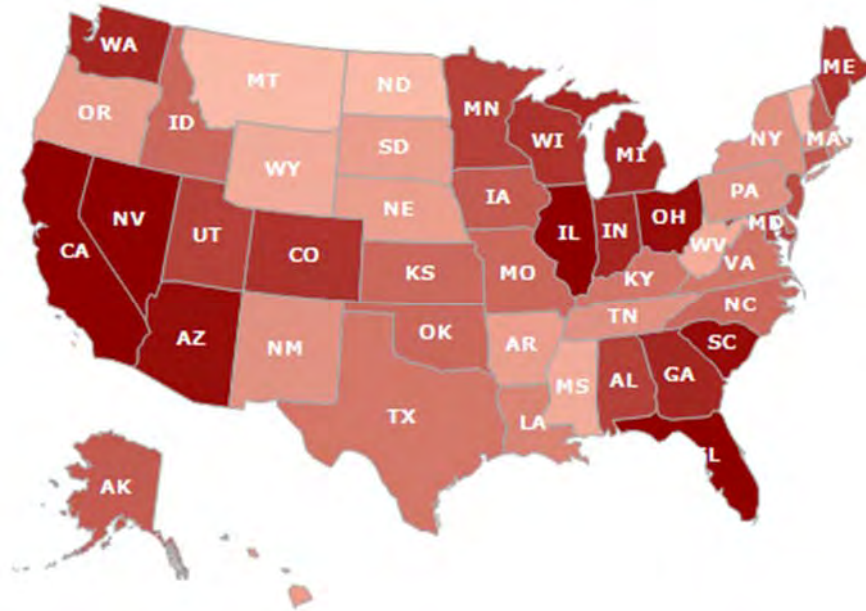
iv. Foreclosure Trends

National Foreclosure Data

The State of Connecticut has experienced moderate foreclosure rates relative to the remainder of the United States. In November of 2012, foreclosures affected one in every 728 houses in the United States. Other states, primarily in the south, west and industrial Midwest, had significantly higher foreclosure rates. Florida, for instance, experienced foreclosure rates of one in every 304 housing units. Connecticut's rate of one in every 1,054 homes in foreclosure beat the national average. Figure 3-18 shows a map of foreclosure rates in the US. Darker reds indicate higher foreclosure rates.

Figure 3-18
Foreclosure Rates by State, November 2012





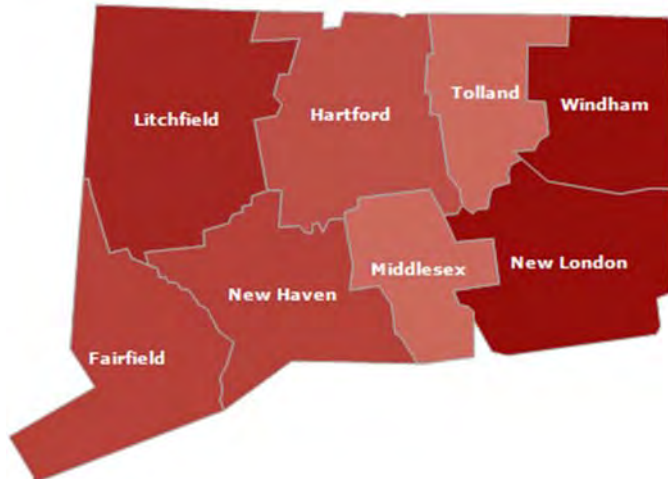
Source: Realtytrac.com

Foreclosure in Connecticut

Within the State of Connecticut, there were varying rates of foreclosure. For example, New Haven County's rate was one in every 1,026 housing units, roughly equal to the statewide average. Other counties such as Windham had significantly higher rates at one in 767 housing units, while Middlesex had significantly lower rates at one in every 1,527 housing units.

Figure 3-19
Foreclosure Rates by County, November 2012





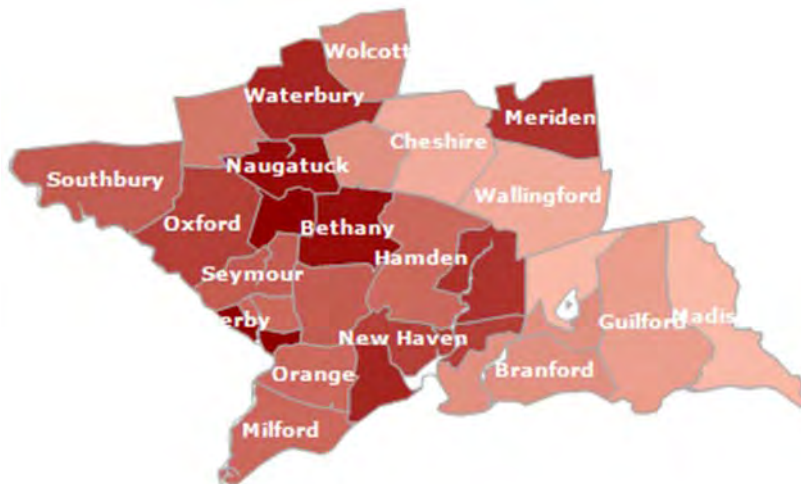
Source: Realtytrac.com

Foreclosure within New Haven County

Within New Haven County, Waterbury's rate of one in every 738 homes was one of the highest in the County. The City's 65 properties in foreclosure was also the highest number of foreclosed properties. At one in 501 houses in foreclosure, Beacon Falls had the highest foreclosure rate in the County. Figures 3-20 and 3-21 illustrate municipalities' rates of foreclosure in New Haven County.

Figure 3-20

Foreclosure Rates by Municipality, November 2012



Source: Realtytrac.com

Figure 3-21

Foreclosure Rates of Select Municipalities in New Haven County, November 2012

Municipality	Foreclosure Rate
Beacon Falls	1 in every 501
Derby	1 in every 532
Naugatuck	1 in every 596
Bethany	1 in every 681
Waterbury	1 in every 738
Middlebury	1 in every 1444
Wolcott	1 in every 1569
Prospect	1 in every 1733
Cheshire	1 in every 2078

Source: Realtytrac.com

Surrounding municipalities shown in light blue

v. The Tendency of the Protected Classes to Live in Larger Households

Household Size and Fair Housing

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

Household Size in Waterbury

In Waterbury, most minorities were more likely than Whites to live in families with three or more persons. Among individual minority groups, Other Race households had the highest rate of larger family households, at 78.2%. Notably, Hispanics had the lowest percent of larger families in Waterbury; however, larger families comprise more than 50% of all families in the City and in every individual minority group. Figure 3-22 shows the percent of minority groups that have three or more persons per household.

Figure 3-22
Families with Three or More Persons, 2010

	Family households:		
	Family households	Families with Three or More Persons	% Families with Three or More Persons
Total	26,996	17,162	63.6%
Whites	16,414	9,431	57.5%
Blacks	5,273	3,664	69.5%
AIAN	158	109	69.0%
Asian	490	357	72.9%
Other	3,751	2,935	78.2%
Two or more races	912	666	73.0%
Hispanic	12,978	6,883	53.0%

Source: U.S. Census Bureau, 2010 Census (SF1, P28A, P28B, P28C, P28D, P28E, P28F, P28G, and P28I)

Housing Stock in Waterbury

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Waterbury, there are fewer options to rent a unit to accommodate larger families. In the City’s rental housing stock, 13.4% of units have three or more bedrooms. By comparison, 33.8% of all owner-occupied units were comprised of three or more bedrooms.

Figure 3-23
Housing Units by Number of Bedrooms, 2010

	Renter occupied		Owner occupied	
	# units	% of all units	# units	% of all units
0 to 1 bedroom	6,594	15.5%	592	1.4%
2 bedrooms	9,170	21.5%	6,169	14.5%
3 or more bedrooms	5,692	13.4%	14,382	33.8%
Total	21,456	100.0%	21,143	100.0%

Source: U.S. Census Bureau, 2007-11 American Community Survey (B25042)



Waterbury has fewer rental units capable of housing large families.

Among rental units, 13.4% have three or more bedrooms compared to 33.8% of owner-occupied units. This can impede housing choice for racial minorities, which tend to have larger families.



vi. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing outside those areas.

Median household income in Waterbury in 2000, when adjusted for 2011 inflation, was \$44,785. The citywide median housing value was \$132,324, while the median gross rent was \$734.

Between 2000 and 2010, median housing value increased 23.9% while median gross rent increased 20.0%. During this same period, median household income decreased 7.3%, falling more than \$3,000. Given this decrease in median household income, housing became less affordable in Waterbury over the last decade.

Figures 3-24 and 3-25 show the change between 2000 and 2011 in median gross rent, median housing value and median household income.

Figure 3-24

Trends in Median Housing Value, Rent, and Income, 2000-2011

	Median Gross Rent	Median Housing Value	Median Household Income
2000	\$734	\$132,324	\$44,785
2011	\$881	\$164,000	\$41,499
% change 00-11	20.0%	23.9%	-7.3%

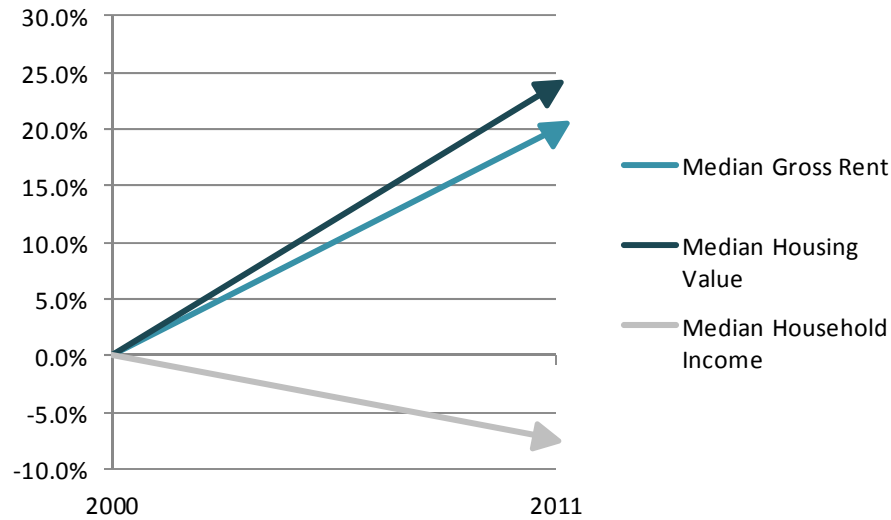
Source: U.S. Census Bureau, 2000 Census (SF-3, H76, H63, P53), 2007-11 American Community Survey (B25077, B25064, B19013); BLS.gov

Note: All numbers in the chart above are 2011 inflation-adjusted.

Figure 3-25

Percent Change in Housing Affordability Factors, 2000-2011





Source: U.S. Census Bureau, 2000 Census (SF-3, H76, H63, P53), 2006-10 American Community Survey (B25077, B25064, B19013); BLS.gov

Note: All numbers in the chart above are 2011 inflation-adjusted.



Since 2000, housing costs in Waterbury have increased while median household income has decreased, making housing more expensive.

Both median housing value and median rent increased more than 20% between 2000 and 2011, while median income fell 7.3%.

a. Rental Housing

Loss of Affordable Rentals

Waterbury has experienced an overall net decrease in affordable rental units over the past decade. Between 2000 and 2011, the total number of apartments decreased 3.4% in the City. Among apartments with rents of less than \$500, there are 4,617 fewer apartments in 2011, a decrease of nearly 60%. The most expensive category of apartments, those costing \$1000 or more, increased 887.1% or 6,068 apartments. Given limitations in the data, it is unclear whether the loss of the more affordable apartments is due to increasing rents and/or demolition of units.

Figure 3-26

Loss of Affordable Rental Housing Units, 2000-2011



Year	2000	2011	# Change 2000- 2011	% Change 2000- 2011
Total	22,220	21,456	-764	-3.4%
Less than \$500	7,706	3,089	-4,617	-59.9%
\$500 to \$699	9,084	2,737	-6,347	-69.9%
\$700 to \$999	4,074	7,927	3,853	94.6%
\$1000 or more	684	6,752	6,068	887.1%

Sources: U.S. Census Bureau, 2000 Census (SF3, H62), 2007-11 American Community Survey (B25063)



Between 2000 and 2011, Waterbury lost nearly 60% of its most affordable rental units.

The total number of rental units in the City decreased by 764. The number of apartments renting for less than \$500 decreased by 4,617 units while apartments renting for \$1000 or more gained 6,068 units.

Fair Market Rent and Affordability

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each HUD Metro FMR Area (HMFA) in the U.S. In the Waterbury HMFA, the FMR for a two-bedroom apartment is \$1,075. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn \$43,000 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$20.67.

In Waterbury, a minimum wage worker earns an hourly wage of \$8.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 100 hours per week, 52 weeks per year. Alternatively, a household must include 2.5 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In Waterbury, the estimated average wage for a renter is \$12.74. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 65 hours per week, 52 weeks per year. Otherwise, working 40 hours per week year-round, a household must include 1.6 workers earning the mean renter wage in order to make the two-bedroom FMR affordable.



Minimum-wage and single-income households cannot afford a housing unit renting for the HUD fair market rent in Waterbury.



b. Sales Housing

Affordability and Income

Trends in the Waterbury housing market follow national trends since the 2008 economic crisis including decreased sales prices and fewer homes sold. Between December 2007 and December 2012, the median sales price of a home in Waterbury has fallen from \$147,000 to \$84,200. The number of sales has decreased as well but appears to have stabilized over the past five years. This information is displayed in Figures 3-27 and 3-28.

Figure 3-27
Trends in Median Sales Price, 2007-2012

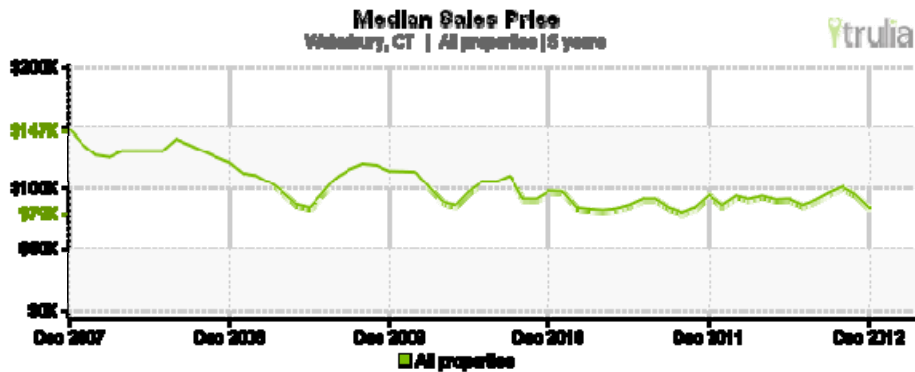
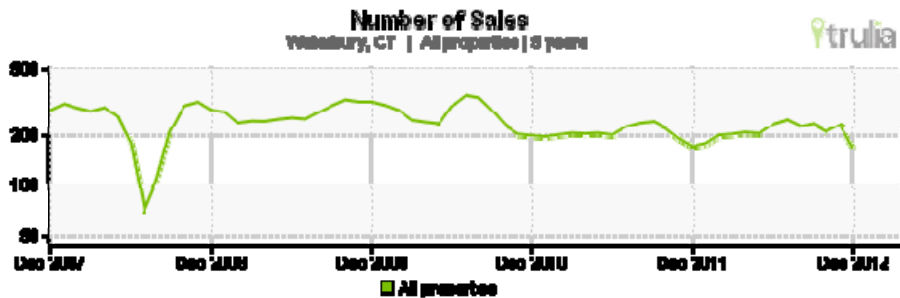


Figure 3-28
Trends in Number of Sales, 2007-2012

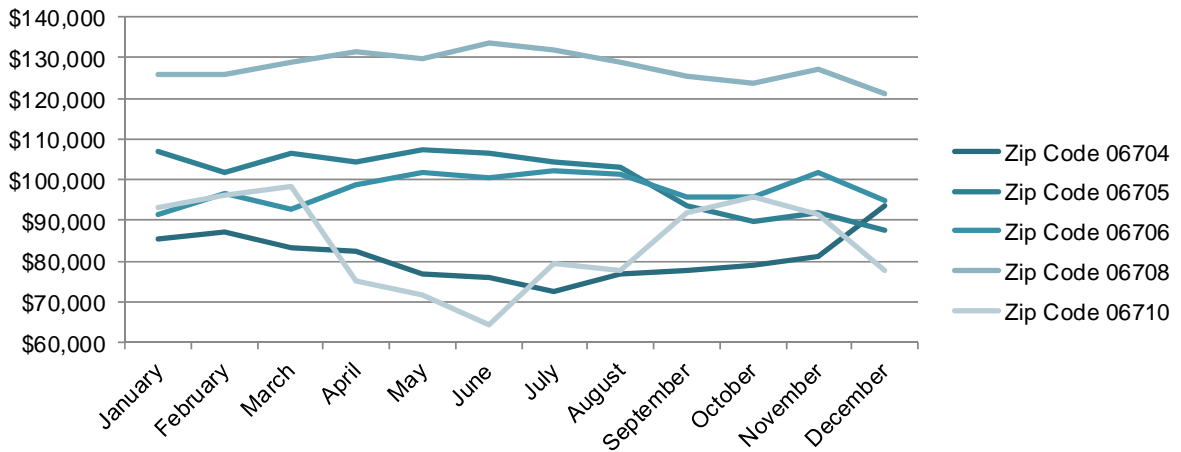


Additional information provided by the Greater Waterbury Board of Realtors shows the variation in average purchase price by zip code in Waterbury. The information shows no definitive pattern among the various zip codes, but does show significant differences by area.

Zip Code 06710 focuses on the center city and areas just north of the downtown. Not only does that zip code show the widest change in average sales price, its median sales price of \$55,000 is the lowest of all the zip codes. Zip code 06708, which is the western and southern portions of Waterbury, had the highest median sales price at \$120,000.



Figure 3-29
Trends in Number of Sales, 2007-2012



Source: Greater Waterbury Board of Realtors

Affordable Purchase Price

One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level. It is possible also to determine the affordability of the housing market for each racial or ethnic group in the City. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 4.0% interest rate,
- The buyer made a 10% down payment on the sales price,
- Principal, interest, taxes and insurance (PITI) equaled no more than 30% of gross monthly income,
- Property taxes were levied at a mill rate of 41.82,⁸ and
- \$500 of additional consumer debt was assumed

Figure 3-30 details the estimated *maximum* affordable sales prices and monthly PITI payments for Whites, Blacks, Asians, and Hispanics in the City.

In 2011, Black and Hispanic households could not afford a home selling for the median sales price of \$84,200. Hispanic households had the lowest affordable purchase price of all racial/ethnic groups at \$31,700, or \$52,500 lower than the median sales price. Black households have an affordable purchase price of \$75,475. By comparison, White households were able to afford a home selling for above the median sales price, with a maximum affordable purchase price of \$116,825. Asian households have the highest maximum affordable purchase price at \$144,875.

⁸ O'Leary, Neil M., "2012 Property Re-Valuation: An On-Going Series to Help You Understand the Process," www.waterburyct.org.



Figure 3-30
Maximum Affordable Purchase Price by Race/Ethnicity, 2011

	Median Household Income	Monthly Mortgage Payment			Total PITI Payment	Maximum Affordable Purchase Price
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI		
Waterbury Total	\$41,499	\$402	\$228	\$80	\$710	\$93,590
White Households	\$46,867	\$502	\$285	\$80	\$867	\$116,825
Black Households	\$37,318	\$324	\$184	\$80	\$588	\$75,475
Asian Households	\$53,345	\$622	\$353	\$80	\$1,055	\$144,875
Hispanic Households	\$27,207	\$136	\$77	\$80	\$293	\$31,700
2012 Median Sales Price: \$84,200*						

*Median Sales Price from Trulia.com. Based on September 2012-November 2012 sales data.

Sources: U.S. Census Bureau, 2007-11 American Community Survey (B19013, B19013A, B19013B, B19013I); Trulia.com; Calculations by Mullin & Lonergan Associates, Inc.



Black and Hispanic households earning the median income of \$37,318 and \$27,207, respectively, cannot afford the median sales price of \$84,200 in Waterbury.

This disparity in home ownership affordability places Blacks and Hispanics at a much greater disadvantage in accumulating wealth than Whites and Asians. Notably, with much lower incomes, Black and Hispanic households are greatly limited in their purchase options in general, but also in their geographic location choices and quality of the housing available to them. Thus, their housing choice is significantly restricted.

vii. Housing Market Analysis

Household Growth and Housing Availability

Previous analysis of household change has shown that the City's growth has been virtually stagnant with a loss of 23 households between 2000 and 2011, correlating to a loss of 0.05%. In comparison, New Haven County grew 3.56% and the State grew 4.49%.⁹ While the number of City households remains steady, the number of White households has decreased 12.8% while Black households have increased 22.1% and Hispanic households have increased 52.5%.¹⁰ Increasing minority households, with lower median household incomes and lower homeownership rates, will alter the community's housing needs.

Vacancy

⁹ U.S. Census Bureau, 2000 Census (QT-P10); 2007-2011 American Community Survey (S1101).

¹⁰ U.S. Census Bureau, 2000 Census (P026A, P026B, P026D, P026H); 2007-2011 American Community Survey (B1101A, B1101B, B1101D, B1101I).

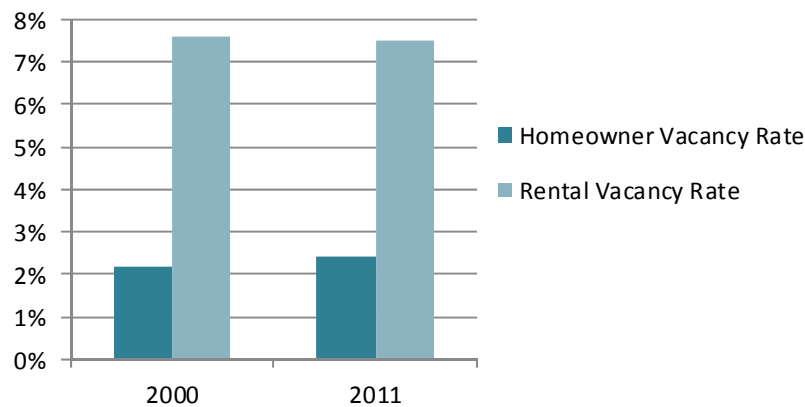


Homeowner vacancy rates and rental vacancy rates show different patterns of change over the last decade. Homeowner vacancy rates grew slightly between 2000 and 2011, increasing from 2.2% to 2.4% despite a 2.5% increase in the housing stock in the last decade. A 2.4% vacancy rate is an extremely tight market for single-family housing.

By comparison, rental vacancies have remained virtually unchanged from 7.6% in 2000 to 7.5% in 2011. This is a healthy vacancy rate that allows for mobility among renters.

The changes in vacancy rates, as seen in Figure 3-31, are consistent with national trends that show the rental market tightening as a result of the recession.

Figure 3-31
Vacancy Rates, 2000-2011



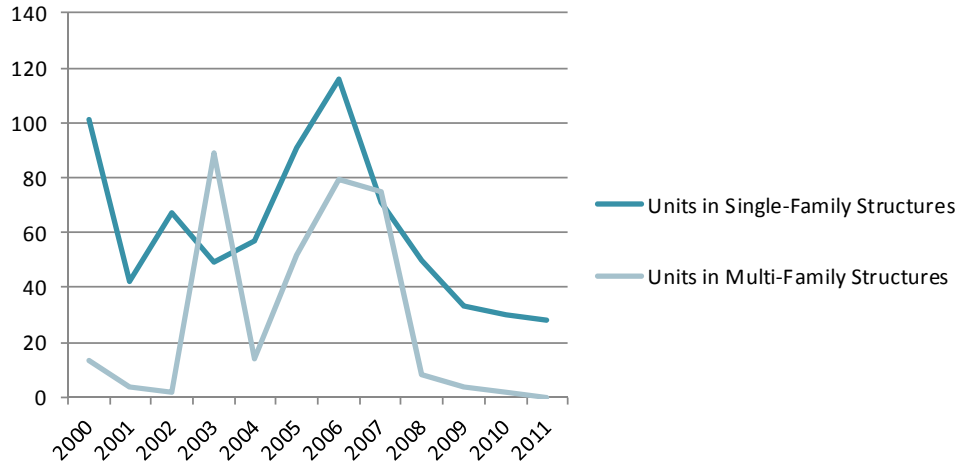
Source: U.S. Census Bureau, 2000 Census (DP-1); 2007-2011 American Community Survey (DP04).

Building Permits

Consistent with the national recession and decline in the housing market, building permits in Waterbury for single-family structures have declined significantly since the height of the housing bubble in the mid-2000s. In 2006, there were 116 permits for single-family structures, but that has fallen to 28 permits in 2011. Similarly, building permits for multi-family structures have declined from a high of 79 in 2006 to zero in 2011.

The lack of new, higher-cost multi-family construction and the decrease in the number of rental units for less than \$500 could exert more pressure on the local rental market.

Figure 3-32
Building Permits Issued by Type of Construction, 2000-2011



Source: HUD, State of the Cities Data System, 2012



Building permits for multi-family structures have decreased from a high of 79 units in 2006 to zero in 2011.

This could lead to a tightening of the rental market in Waterbury.



4. Housing Discrimination Complaints

This section analyzes the existence of fair housing complaints or compliance reviews where a charge of discrimination has been made. This section will also review any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to identifying any other fair housing concerns.

Citizens of Waterbury receive fair housing services from a variety of organizations, including but not limited to the Connecticut Commission on Human Rights and Opportunities, Connecticut Legal Services, and the Waterbury Human Rights Commission. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing and/or work to promote a mutual understanding of diversity among residents.

A. Existence of Fair Housing Complaints

The number of complaints reported may under-represent the actual occurrence of housing discrimination in any given community, as persons may not file complaints because they are unaware of how or where to do so. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware of discrimination, but they may not be aware that it is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

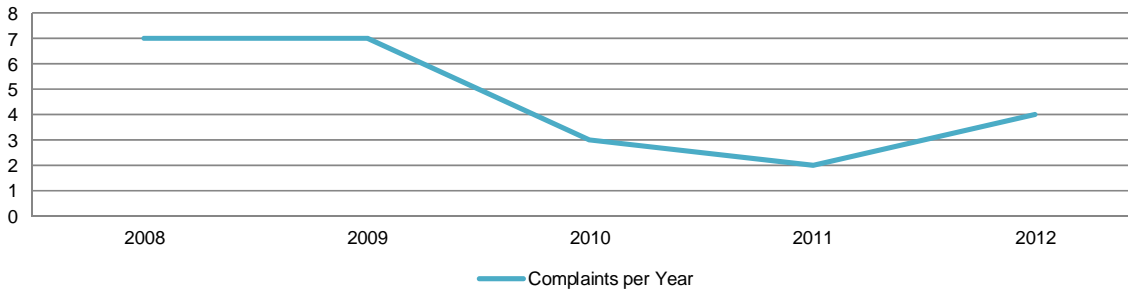
i. U.S. Department of Housing and Urban Development

Overview of Data

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Waterbury were obtained and analyzed from FY2008 through FY2013. In total, 23 complaints originating in Waterbury were filed with HUD during the full years 2008 through 2012, an average of 4.6 per year. The volume of cases was generally higher in 2008 and 2009, with a minimum of two filed in 2011 and a maximum of 7 filed in 2008 and 2009.

Analysis of the occurrence of complaints over time is more useful than analysis of complaints among various HUD regions, due to substantial differences in the size and demographic composition of regions and the presence or absence of other means of reporting complaints (to state or local enforcement agencies). The figure below shows the number of cases each year from FY 2008.

Figure 4-1
Number of Complaints Filed with HUD, 2008-2012

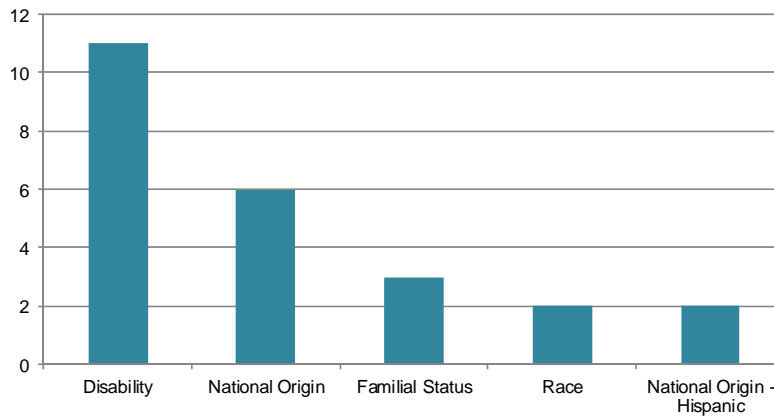


Source: HUD FHEO

Basis of Discrimination

In addition to number of complaints per year, filings included information on the basis of discrimination. Disability was the most common basis for complaints with 45.8% of all filings. This was followed by non-Hispanic national origin and familial status. HUD separated Hispanic-based national origin complaints from non-Hispanic-based complaints in its report. The figure below shows HUD complaints by the basis of discrimination.

Figure 4-2
HUD Complaints in Waterbury by Basis of Discrimination, 2008-2013



Source: HUD FHEO

Resolution of Complaints

In terms of result, of the 19 complaints that were resolved, 37% were conciliated with a successful settlement. A complaint is considered conciliated when all of the parties to the complaint enter into a conciliation agreement with HUD. Such agreements include benefits for the complainant, and affirmative action on the part of the respondent, such as civil rights training. HUD has the authority to monitor and enforce these agreements.



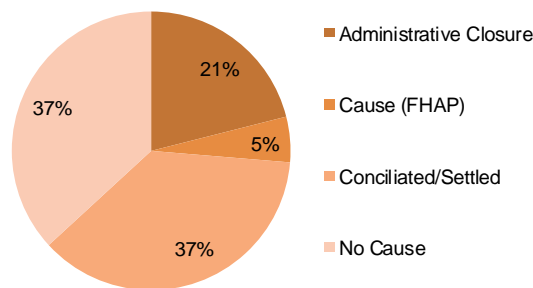
Additionally, 5% of the cases were resolved with "Cause (FHAP)." A FHAP is a HUD-certified Fair Housing Assistance Program agency. The FHAP designation is for agencies enforcing local fair housing laws that HUD has deemed to be substantially equivalent to the federal Fair Housing Act. HUD "partners" with these agencies to investigate and resolve cases. The "FHAP" outcome probably refers to a consent decree/conciliation, which is an agreement between all parties and HUD. Such agreements include benefits for the complainant and affirmative action on the part of the respondent, such as civil rights training. HUD has the authority to monitor and enforce these agreements.

Of the total complaints filed, an equal number (37%) were found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination.

Another 21% of cases were administratively closed, due to complaint withdrawal before or after resolution, judicial dismissal or the complainant's refusal to cooperate. Caution should be used when interpreting complaints that are administratively closed. This resolution does not always mean that housing discrimination has not occurred. In the case of a complainant withdrawing a complaint, an uncooperative complainant, or a complainant who cannot be located, it is possible that the complainant changed their mind, decided against the trouble of following through with the complainant, chose to seek other housing without delay, or other reasons.

Only one of the cases in Waterbury resulted in financial compensation to the complainant. The case, in 2012, resulted in a compensation payment of \$2,900.

Figure 4-3
Resolution of HUD Complaints in Waterbury, 2008-2012



Source: HUD FHEO

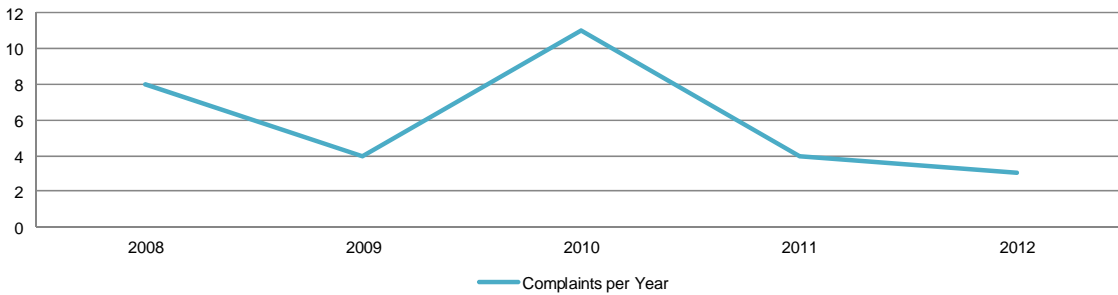
ii. Connecticut Commission on Human Rights and Opportunities

Overview of Data

The Connecticut Commission on Human Rights and Opportunities (CHRO) provided data on housing complaints originating in Waterbury between March 2008 and June 2012. During these five years, there were 30 filings, equivalent to an average of about six cases per year. A spike in cases occurred in 2010, with 11 cases filed that year.



Figure 4-4
Number of Complaints Filed with CHRO, 2008-2012



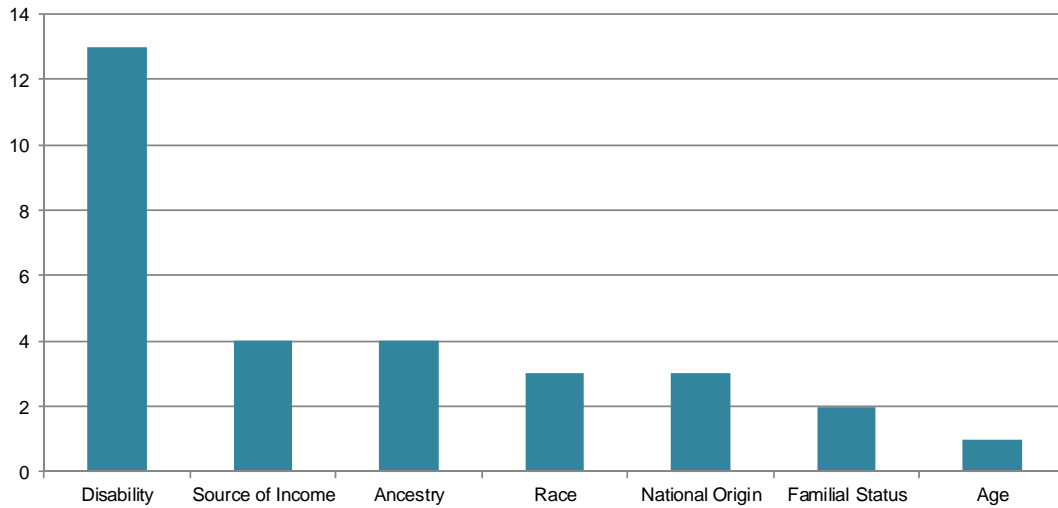
Source: Connecticut Commission on Human Rights and Opportunities

Basis of Discrimination

Of the 30 total filings with the CHRO, 36.7% alleged discrimination on the basis of disability, 13.3% on the basis of source of income, and 13.3% on the basis of ancestry. An additional 10% of cases were filed on the basis of race and 10% on the basis of national origin.

By large margins, disability is the most common basis of discrimination in both HUD and CHRO complaints in Waterbury.

Figure 4-5
CHRO Complaints in Waterbury by Basis of Discrimination, 2008-2012



Source: Connecticut Commission on Human Rights and Opportunities





Across Waterbury, disability was the primary basis for fair housing complaints to HUD and the Connecticut Commission on Human Rights and Opportunities between 2008 and 2012.

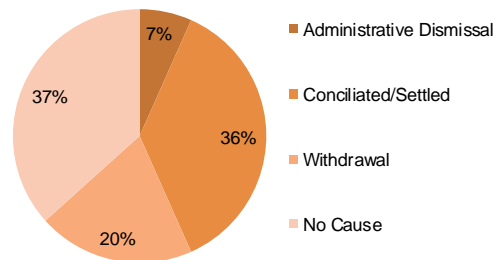
A total of 24 complaints alleged disability as the basis for discrimination, representing 45% of the 53 complaints filed over the five-year period.

Resolution of Complaints

All complaints filed with CHRO were closed as of June 2012. The largest percent (37%) of cases were found to be without probable cause. Almost as many cases, 36%, were conciliated or settled. Withdrawals accounted for 20% and administratively dismissed cases accounted for the final 7%.

Of the 11 cases that ended in conciliation or settlement, the majority (8) involved a physical disability, and one each involved source of income, race and national origin.

Figure 4-6
Resolution of CHRO Complaints in Waterbury, 2008-2012



Source: Connecticut Commission on Human Rights and Opportunities

iii. Waterbury Human Rights Commission

The Waterbury Human Rights Commission is the local board empowered to enforce the City’s Human Rights Ordinance. While active in the community, the Commission noted that it had not received any fair housing complaints recently. HRC representatives noted that the greatest obstacle to receiving complaints was a lack of community awareness about the HRC, its function, and its enforcement powers.





The Waterbury community may not be fully aware of the local Human Rights Commission.

The local HRC has not received any complaints recently and pointed to a lack of awareness as one contributing factor.

B. Testing for Fair Housing Complaints

Testing is the practice of sending pairs of people into the same situation to determine the presence of housing discrimination against members of the protected classes. For instance, a Black renter and White renter would be sent into the same rental community to determine if the landlord offered the same treatment to both persons. Testers are encouraged to pattern their program pursuant to the HUD Fair Housing Initiative Program (FHIP) Private Enforcement Initiative. Testing may be done for discrimination based on any protected class characteristics, but certain groups tend to focus on members of their community that have reported increased discrimination or groups that may be growing in numbers.

i. Testing

In discussions with area stakeholders, no groups have undertaken paired testing in Waterbury. Testing is an important part of understanding the fair housing profile of a city.



No group has recently undertaken paired testing to determine the presence of discrimination in housing.

Testing is an important part of the fair housing profile of a city because it can reveal the extent of actual discrimination.

C. Existence of Fair Housing Discrimination Suit

There is no pending fair housing discrimination suit involving Waterbury.

D. Determination of Unlawful Segregation

There is no pending unlawful segregation order involving Waterbury.

5. Evaluation of Public Sector Policies

The Analysis of Impediments is a review of obstacles to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin may constitute an impediment.

An important element of the AI includes an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the City to determine opportunities for expanding fair housing choice.

A. Policies Governing Investment of Federal Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower-income households has shifted much of the challenge of affordable housing production to state, county and local government decision makers.

Federal Entitlement Programs

Waterbury's federal entitlement funds received from HUD may be used for a variety of activities to serve a variety of needs, as follows:

- **Community Development Block Grant (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program (HOME):** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- **Emergency Solutions Grant (ESG):** The ESG program provides federal funds for basic shelter and essential supportive services for homeless persons. ESG funds can be used for shelter facility operating costs and grant administration, as well as short-term homeless prevention assistance to persons at imminent risk of losing their own housing due to eviction, foreclosure or utility shutoffs.

Across all formula grant funding sources, the City allocated \$701,576.50 in FY 2012-2013 funds for a variety of activities related to the expansion of housing opportunities, including construction of single-family homes, construction of rental housing, preparation for future housing projects, homeownership programs, and homeowner rehabilitation programs.

Pure Fair Housing Activities

In 2011, the City's CDBG budget included an allocation for Connecticut Legal Services to provide legal services for residents with attention to fair housing issues. This amounted to \$15,500 for fair housing programs. The goal of the program was to serve 300 persons; however, only 23 persons were served. This amounted to \$15,500 for fair housing programs, and is equivalent to 0.5% of the total City FY 2011 CDBG entitlement grant of \$3,218,369.43.

While \$15,500 was an increase in funding for fair housing services from \$500 in FY 2010, the program anticipated serving 100 fewer persons in 2011. Connecticut Legal Services did not meet its goal either year, serving only 21 persons in 2010 and 23 persons in 2011. Funds decreased to \$10,388.72 in program Year 4 and to \$5,000 in program Year 5.



The City has budgeted decreasing amounts of its CDBG grant to implement pure fair housing activities. In addition, the number of actual beneficiaries is only a fraction of the number proposed.

The City should reevaluate its fair housing budget and the manner in which the funds are spent to eligible subrecipients.

i. **Project Proposal and Selection**

Responsible Party

The Waterbury Board of Aldermen is ultimately responsible for federal entitlement programs administered by the City. The Waterbury Development Corporation (WDC) is the lead agency in the planning and administration of the City's federal entitlement programs. The City also established a Citizens Advisory Committee (CAC) in 2007 to administer citizen participation requirements. With the assistance of WDC staff, the CAC reviews annual applications for funding and makes recommendations to the WDC Board of Directors and the City of Waterbury Board of Aldermen.

Waterbury Development Corporation compiles the City's Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The current Consolidated Plan is effective through June 30, 2013.

Objectives and Outcomes

In the FY 2008-2013 Consolidated Plan, the City identified four objectives for its federal programs. These include:

- Extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations
- Provide decent housing
- Provide a suitable living environment
- Expand economic opportunities for citizens

The plan further describes the priority goals of the community, including focusing on adaptive reuse projects, mixed-income projects, making homeownership affordable, and enhancing Waterbury's disinvested neighborhoods.

Application Process for Funds

In FY 2013, Waterbury allocated \$1,878,054 in CDBG funds, \$693,702 in HOME funds and \$180,059 in ESG funds. Those funds released on a competitive basis are reviewed and scored during the application process.

Applications for all Waterbury HUD programs are evaluated according to standards established in the application packet and an internal point system used by WDC staff members. The scoring criteria include:

- 5 points: Service/Activity Quality**
Example: has the service/activity performed well in the past, has it met past goals, is it a well-thought out proposal, does it have identified and scheduled goals
- 5 points: Financial Quality/Budget/Leveraging**
Example: is the applicant financially sound, does the project have a realistic budget, are the proposed expenses justifiable, are expenses itemized
- 5 points: Organizational Capacity/Past History**
Example: does the agency have the organizational capacity for the proposal, have past reporting requirements been met, have past services been delivered
- 5 points: Program/Project Readiness**
Example: is the project ready to move forward, does a building project have site control and prepared specifications, does the program seem feasible

Total: 20 Points

The City does not review proposed projects for fair housing impact nor require fair housing training as a requirement for successful applicants.



Presently, the City's application review process does not include a fair housing component.

There is no evaluation criteria reflecting whether a project would assist the City in achieving its AFFH goals. In addition, providing mandatory fair housing training as a requirement to receive funds would educate subrecipients about their obligation to affirmatively further fair housing.



Following the initial eligibility review by staff, the list of projects is scored by the CAC, whose recommendations are included in the City's Annual Plan and posted for a 30-day review. Other groups and individuals are encouraged to make comments on the CAC's recommendations, and a final document is created based on these comments. The draft is given to the WDC Board of Directors for review. Any changes are sent back to the CAC or, if approved by the WDC Board, the Plan is sent to the Waterbury Board of Alderman for approval.

Targeted Investment

The Consolidated Plan targeted investment toward three neighborhoods: the upper South End and South Main Street, the North End neighborhoods, and Brooklyn. These neighborhoods were targeted for investment because they had high crime or vacancy rates, were surrounding proposed school sites, had concentrations of tax-delinquent properties, were gateways to the City, and had some development momentum. Most are located outside of RCAPs/ECAPs as previously identified.

ii. Affirmative Marketing Policy

Federal Requirements

The City is federally required to adopt affirmative marketing procedures and requirements for all CDBG and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the City's policies
- A description of what the owners and/or the City will do to affirmatively market housing assisted with CDBG or HOME funds
- A description of what the owners and/or the City will do to inform persons not likely to apply for housing without special outreach
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

Waterbury's Affirmative Marketing Plan

The City's Affirmative Marketing Plan applies to all rental facilities with five or more units that are assisted by City HOME funds or any other state and federal funded housing projects.

The Plan, as developed in 2008 and updated in 2011, requires that special marketing outreach consideration be given to those who are least likely to seek out the housing being marketed. Developers are required to describe an outreach program to attract this identified segment including organizations and media most appropriate to participate in the outreach program, a description of the methods to be used, and benchmarks to assess the effectiveness of the outreach. A description of the provisions for fair housing training and effective marketing training given to staff is also required. WDC will monitor the affirmative marketing plan quarterly until the housing has achieved 90% occupancy and annually thereafter.

The City's Affirmative Marketing Plan includes suggested methods of outreach, such as newspaper advertisements including Spanish-language and community based newspapers; religious, social and service organizations that can serve as

conduits for information about housing; and attendance at annual housing fairs organized by WDC. The Plan also requires housing developers to submit the project’s tenant selection criteria and grievance policies for review.

➤ Fair Housing Achievement

Waterbury recently updated its Affirmative Marketing Plan and included concrete, achievable methods of targeting populations least likely to apply for housing.

The Affirmative Marketing Plan includes not only proactive steps for targeting populations but also requires information on a project’s selection criteria, grievance policies, and guidelines for reporting and monitoring subrecipients.

iii. Spending Patterns

Entitlement jurisdictions are required to prepare Annual Plans describing activities that will be supported by federal entitlement grant funds. The following narrative includes an analysis of the most recent year of the City’s allocation of entitlement funds, as reported in its Annual Plan.

HOME Funds

In the City of Waterbury’s Year 38 Annual Plan, the majority of HOME funds were allocated to the housing rehabilitation program. This accounted for 75% of HOME funds and was used to create and rehabilitate housing units City-wide and in targeted neighborhoods. In addition, 15% of the HOME grant was budgeted for CHDO housing development for costs related to the development of projects that promote affordable housing.

Figure 5-1
HOME Allocations, Year 38

Program by Outcome and Objective	Year 38	
		% of Total HOME Allocation
Affordability of Decent Housing	\$104,055.30	15.0%
CHDO Housing Development	\$104,055.39	15.0%
Sustainability of Decent Housing	\$520,276.50	75.0%
Housing Rehabilitation	\$520,276.50	75.0%
HOME Administration	\$69,370.20	10.0%
Total	\$693,702.00	100.0%

Source: Year 38 Action Plan

CDBG Funds

CDBG funds were used for a variety of purposes in Year 38. Only three programs were directly related to housing initiatives, accounting for 13.1% of the annual CDBG budget. Those programs included Connecticut Legal Services, which



provides fair housing counseling to residents; Loyola Development’s housing rehabilitation program that offers zero-interest loans to eligible residents for housing rehabilitation projects; and a demolition program that aims to tear down four or five properties in the City.

Other social services included \$5,000 to literacy volunteers, \$15,000 to serve behavioral health programs, \$6,000 to provide transportation to the Hispanic elderly population, \$118,308.10 for the Waterbury Senior shuttle, and \$7,000 for job training programs.

Other non-social services include public facility improvements and sidewalk improvements.

Figure 5-2
CDBG Allocations, Year 38

Program by Outcome and Objective	Year 38	
		% of Total CDBG Allocation
Social Services	\$281,708.10	15.0%
Connecticut Legal Services	\$5,000.00	0.3%
Other Social Services	276708.1	14.7%
Housing and Public Infrastructure	\$1,220,735.10	65.0%
Zero Interest Rehabilitation Loans	\$165,000.00	8.8%
Demolition	\$75,735.10	4.0%
Public Infrastructure	\$980,000.00	52.2%
Administration	\$375,610.80	20.0%
Total	\$1,878,054.00	100.0%

Source: Year 38 Action Plan

ESG Funds

In Year 38, ESG funds were used for Shelter Operations for Safe Haven, the Salvation Army and St. Vincent DePaul. St. Vincent DePaul also ran the City’s rapid re-housing program, and the Salvation Army undertook the City’s homelessness prevention program.

Figure 5-3
ESG Allocations, Year 38

Program by Outcome and Objective	Year 38	
		% of Total ESG Allocation
Shelter Operations	\$98,035.00	54.4%
Rapid Re-housing	\$22,500.00	12.5%
Homelessness Prevention	\$50,524.00	28.1%
Administration	\$9,000.00	5.0%
Total	\$180,059.00	100.0%

Source: Year 38 Action Plan



B. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to housing related goals and objectives are often measured by board members, directorships, and the extent to which these individuals understand the organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort and public leadership.

The Mayor of Waterbury appoints residents to serve on dozens of various boards and commissions focused on a wide range of issues. The following body is especially relevant to issues of fair housing.

i. Waterbury Citizen Advisory Committee

The Waterbury Citizen Advisory Committee administers the citizen participation requirements for HUD programs and recommends for approval the grant applications for CDBG, ESG and HOME funds. These recommendations go to the WDC Board of Directors and the Waterbury Board of Aldermen to be implemented.

The CAC is comprised of 17 members, with the majority living in, owning a business in, working in or representing the interests of low- or moderate-income citizens in Waterbury. Specifically, membership represents the following interest groups:

- The Mayor or the Mayor's designee
- The Board of Aldermen (3)
- Waterbury Housing Authority (1)
- Planning Commission (1)
- Continuum of Care (CoC) representative (1)
- Representative of a non-profit housing services organization (1)
- Social service representatives (2)
- Low- or moderate-income residents representing a wide variety of neighborhoods from eligible census tracts, including neighborhoods or census tracts that may be targeted for funds under the Consolidated Plan (7)

Of the 11 current members of the board, eight are non-Hispanic Whites, one member is Hispanic, and two are Black. Four members are female, and there are no persons with disabilities on the board.

In comparison to the City as a whole, there are fewer minorities represented on the board. While 20.1% and 31.2% of the City's residents are Black and Hispanic, respectively, Blacks account for 18.2% of the Board's members and Hispanics represent 9.1%.

C. Accessibility of Residential Dwelling Units

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing resources that can be introduced in a community. Housing quality standards are enforced through the local building code and inspections procedures.

Federal law requires a certain percent of all public housing be accessible. These units fall under the Uniform Federal Accessibility Standards for accessible construction.

i. Public Housing Stock

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, an authority's administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible.

Housing Authority of the City of Waterbury

Following a Section 504 review conducted by HUD, the Housing Authority of the City of Waterbury (HACW) was found to be out of compliance in two areas: program accessibility for persons with disabilities and access for persons with limited English proficiency (LEP).

The Housing Authority entered into a Voluntary Compliance Agreement (VCA) with HUD to correct these issues. The agreement, entered into on September 30, 2011, requires the Housing Authority to undertake corrective actions including the following:

- survey common areas and accessible units to ensure they meet standards
- conduct a Needs Assessment to identify the number and type of units needed for the disabled population
- create a Transition Plan to bring current units into compliance with the agreement and the assessment
- take corrective actions to bring public spaces and accessible units into compliance
- create a Language Access Plan (LAP) to meet the needs of persons with LEP

Since entering into the VCA, the Authority has undertaken a variety of corrective actions. The Authority completed a Needs Assessment and set a goal that 5% of all units be accessible and that accessible units be available in a variety of sizes. A 5% goal equates to 36 accessible units. The current number of accessible housing units in the Authority's portfolio is 28; however, many of these units do not meet current Section 504 regulations.

The Authority has also completed Phase 1A of its site upgrades to help achieve compliance. This phase included repaving and restriping lots at various public housing facilities to ensure the required number of accessible parking spaces.

In addition to these accomplishments, the Authority has hired a consultant to complete a Language Access Plan. The Authority is also on track to complete its Transition Plan for identifying the accessibility improvements to be made. The Transition Plan is expected to be completed in March, 2013. According to reports from the Housing Authority, the organization is in full compliance with its VCA and is meeting goals in a timely manner.



The Housing Authority is working toward compliance with its Section 504 agreement.

The Housing Authority has an obligation to maintain at least 36 accessible units as part of its compliance agreement. To expand the inventory of affordable, accessible housing in Waterbury, it is imperative that the Authority follow through to provide at least the minimum number of units required.

ii. Private Housing Stock

In Connecticut, the Human Rights and Opportunities Act requires accessibility for persons with disabilities in certain multi-family dwellings built after March 13, 1991. This includes buildings of four or more units that have an elevator as well as ground-floor units in buildings of four or more units without an elevator. The Act refers to Sections 29-269 and 29-273 of the Connecticut Code which reference the State Building Code, ANSI.

In Waterbury, building inspectors inspect new or remodeled units to ensure compliance with the State Building Code. They enforce ANSI 117 to ensure this construction complies with accessibility requirements. Despite their efforts, accessibility is a difficult issue in the City. Waterbury's many hills, steep slopes and valleys makes accessible units difficult to construct. With most of the City already built-out, retro-actively rehabilitating units can make the construction process difficult.

The City is considering implementing a rental inspection program. Generally, this program requires landlords to register their rental units and undergo building inspections to ensure the units are safe and in compliance with local codes. Such programs can require fair housing training as a component for landlords to obtain rental certification while also upgrading and preserving affordable, decent rental housing.



With blight and abandonment issues in Waterbury, the City could benefit from the establishment of a rental housing inspection program.

Rental housing inspection programs can assist in creating and preserving decent living environments for residents. Such a program also provides a good venue for mandating fair housing training for landlords owning rental properties in an older, urban area.



D. Language Access Plan for Persons with Limited English Proficiency

Limited English Proficiency

Persons with limited English proficiency (LEP) are defined by the federal government as persons who have a limited ability to read, write, speak or understand English. HUD issued its guidelines on how to address the needs of persons with LEP in January 2007. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

Persons with LEP in Waterbury

As noted in an earlier section of this report, the number of LEP speakers of two different foreign languages across Waterbury exceeds 1,000: Spanish-speakers and Portuguese-speakers. According to stakeholder interviews, there is a large population of Albanian-speakers in Waterbury, which is not a census-reported language, but may account for a high number of Indo-European foreign language speakers.

Four-Factor Analysis

In Waterbury, each of these language groups includes more than 1,000 persons with LEP, exceeding HUD “safe harbor” minimums. In order to determine whether the translation of vital documents is required, the City must conduct the four-factor analysis. The term “vital document” refers generally to any publication that is needed to gain access to the benefits of a program or service. The four-factor analysis requires entitlements such as the City to evaluate the need for translation and/or other accommodations based on four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

Although there is no requirement to develop a Language Access Plan (LAP), HUD entitlement communities are responsible for serving persons with LEP in accordance with Title VI of the Civil Rights Act of 1964. Conducting the four-factor analysis is the best way to comply with this requirement. At present, Waterbury Development Corporation does not have an LAP.



The Waterbury Development Corporation does not presently have a Language Access Plan.

A Language Access Plan helps to identify the number of persons with limited English proficiency and addresses methods of improving access to programs and services.

E. Zoning

The General Statutes of the State of Connecticut, Volume 2, Title 8, Chapter 124, Section 8 sets forth the power and provisions for municipalities to adopt zoning ordinances.

Waterbury has chosen to adopt a zoning ordinance and has created a zoning commission to enforce it. The City's zoning code was reviewed as part of this analysis to determine whether it meets the requirements of the Fair Housing Act regarding the treatment of group homes and to what extent it allows affordable housing to be built.

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities)
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning and transit-oriented developments)
- Minimum lot size requirements
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (i.e. group homes) in single family zoning districts
- Restrictions on the number of unrelated persons in dwelling units.

i. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes, and newer ordinances have not necessarily been updated according to fair housing practices. Waterbury's zoning ordinance was recently updated as part of a planning process including public input. The ordinance was adopted on April 25, 2012. Certain sections have subsequently been amended, as recently as May, 2012.

ii. Residential Zoning Districts and Permitted Dwelling Types

Number of Zoning Districts

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is



indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes.

Waterbury's ordinance provides for six residential districts as well as three commercial districts in which a variety of residential uses are permitted. The categories range from single-family residential districts to districts permitting a variety of residential types. It also includes the central business district which provides for multi-family housing.

Permitting Multi-Family Units

Of the six residential districts and three mixed-use districts, multi-family residences are permitted in three of the residential districts and two of the mixed-use districts. The zoning code is unclear as to whether multi-family residences are special uses or permitted uses.

During interviews, community stakeholders noted that recent zoning updates changed where multi-family developments are permitted. The outer edges of the City, which would have been permitted to build multi-family housing in the past, were limited to single-family and two or three-family units in the zoning update. This eliminated large areas of the City where multi-family development can take place. While this, on the surface, could be a fair housing issue, the City provides substantial other areas for multi-family development both within the City's more developed core and on its periphery. The City has a legitimate interest in reducing densities in the outer areas of the City and does not unfairly limit the housing choice of those needing to live in multi-family units.

➤ Fair Housing Achievement

Waterbury's zoning code allows a variety of areas where multi-family housing can be built in close proximity to other forms of development and with access to transit.

Allowing a variety of areas for multi-family development encourages developments that are affordable. It also provides housing choice for residents seeking to move to different parts of the City.

iii. Permitted Residential Lot Sizes

Because members of the protected classes are often also low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those for smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost

to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

Waterbury's zoning ordinance provides a wide range of residential districts ranging from high-density areas with extremely low minimum lot sizes to single-family districts with lots of at least 12,000 square feet. A minimum 12,000 square foot lot is not excessively large as to make affordable housing impossible. Generally, Waterbury's zoning categories require 6,000 square foot minimum lot sizes, which are well-suited to providing affordable housing opportunities.

iv. **Alternative Design**

Alternative designs are ways of laying out a site or housing development that are different from traditional, suburban-styled housing subdivisions. Alternative designs can include conservation development, in which the same number of homes are built on a single site, but are placed close together to leave room for a community park or to conserve natural resources. Multi-generational homes are another alternative design in which second, small homes are allowed on a site to provide a place for elderly residents to live in close proximity to their family. Transit-oriented developments (TOD) are another type of alternative design. In TODs, higher-density housing, retail, and jobs are clustered around major transit stations to encourage transit use and make getting to and from work or other opportunities easier.

Planned Residential Conservation Development

Waterbury's ordinance contains a provision for planned residential conservation development. This use category allows flexibility in lot widths, setbacks and building coverage while requiring a minimum 35% of the pre-developed areas as open space. This preserves open space through flexible design standards and increased density. In the absence of affordable housing set-asides within these arrangements, however, the districts will likely include primarily higher-priced homes. The zoning code does not specifically require affordable housing as part of the PRCD or give density bonuses for the inclusion of affordable housing.

As long as the market drives the price of units created, developers have little incentive to create moderately priced units. One of the most useful and successful tools for creating affordable housing opportunities is inclusionary zoning. Simply, inclusionary zoning involves a specified number or percentage of new housing units in a development that is set-aside for moderately priced homes. Inclusionary zoning is a "carrot and stick" approach to expanding affordable housing.

Accessory Dwelling Units

An additional design option is the inclusion of accessory dwelling units. These units are detached, small homes, often intended for elderly residents to maintain independence while living in close proximity to family. It is also a more affordable option for seniors.

During discussions with the city planner, accessory units, while not specifically allowed, could still be built under certain conditions. So long as a unit is connected to the principle structure and shares a door, among other considerations, an accessory unit could be built.

Transit-Oriented Development

Transit-oriented developments are mixed-use, walkable complexes located near transit stations. While not inherently affordable, these developments do have the potential for providing affordable housing that includes easy access to frequent transit service.

The Waterbury zoning code does not have an express transit-oriented development district; however, areas around the downtown train station and along major commercial corridors include higher-density permitted uses. These types of uses provide de-facto transit-oriented development.

v. Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in some cases, caps on unrelated individuals residing together may be warranted to avoid overcrowding, thus creating health and safety concerns.

In Waterbury, the City's zoning ordinance defines a family as any number of persons related by blood, marriage or adoption living together as a single entity. The ordinance caps the number of unrelated persons living together at three. While this cap can restrict housing choice for non-traditional families, the regulations make exceptions or separate provisions in each case for group homes for persons with disabilities.



Waterbury's restrictive definition of a family impedes non-traditional family structures from living together.

The City's zoning code limits the number of persons living together at three, which unnecessarily restricts non-traditional families from living together.

vi. Regulations for Group Homes for Persons with Disabilities

Group homes for persons with disabilities are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other single-family residential dwelling use. Because a group home for persons with disabilities serves to provide a non-institutional experience for its occupants, imposing extraordinary conditions is contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes and are inconsistent with the Fair Housing Act.

Group Home Regulations in Waterbury

In Waterbury's zoning code, a "group living facility" is defined as "two or more persons sharing a common dwelling unit who are placed in the dwelling unit by any business, governmental agency, nongovernmental agency, club, organization, congregation, school, college, university entity or individual who does not reside within the dwelling unit." By definition, this includes group homes for persons with disabilities as well as other group living accommodations for persons *without* disabilities such as halfway houses for released offenders, boarding homes, etc. It is important to note the Fair Housing Act does not afford the level of protection to these land uses as it does to group homes for persons with disabilities.

According to the City's zoning ordinance, "group living facilities" are limited to six persons, permitted by-right in three residential districts and by special permit in three commercial districts, and subject to additional regulations when compared to single family homes. These facilities are required to have one parking space per bed compared to 1.5 per dwelling unit for single-family dwellings and are not permitted by-right in the same residential districts as single-family homes.

The City has identified halfway houses for released offenders as a land use that requires additional zoning regulations in order to protect the impact of the land use on surrounding properties and neighborhoods. To achieve this goal without impeding housing choice for persons with disabilities, the distinction should be made in the City's zoning ordinance between "group living facilities" and "group homes for persons with disabilities."



Waterbury's zoning code places additional restrictions on group homes for persons with disabilities.

To remove the restrictive regulations on group homes for persons with disabilities, the City should amend its zoning ordinance and distinguish between the catch-all land use of "group living facilities" and "group homes for persons with disabilities." The latter should be regulated in the same manner as single-family dwelling units.

F. Comprehensive Planning

A community's Comprehensive Plan is a statement of policies relative to new development and preservation of existing assets. The policies put forward in the Plan will define the steps that local leaders will take to guide growth in the City. The land use recommendations define the location, type and character of future development, expressing the preferred density and intensity of existing and planned residential neighborhoods in the City. Taken together, these elements outline a vision for where people will live, how they will get around and the types of employment and recreational opportunities that will be available.

Waterbury Plan of Conservation and Development

The *Waterbury Plan of Conservation and Development* is the City's latest guide for development. Termed a Plan of Conservation and Development by the State of Connecticut, it reflects the dual role of promoting development in appropriate areas while preserving for future generations the natural heritage of the State. Adopted by the



Waterbury City Plan Commission in 2005, this document serves to inform decision-making in regards to housing, transportation, land use, economic development and a variety of other areas.

Plan Elements

The Plan consists of seven topics that each include visions, goals and policies to address that topic. These include the following:

- Economic Development
- Preservation
- Housing and Neighborhoods
- Redevelopment
- Open Space
- Transportation
- Healthy Communities

Many of the visions outlined within this section relate directly or indirectly to fair housing concerns, needs and developments. The following goals were particularly relevant to this analysis:

- Protect and preserve the City's residential areas
- Provide decent, affordable housing for every Waterbury household
- Make Waterbury's neighborhoods "neighborhoods of choice"
- Reduce blight and facilitate redevelopment throughout the City
- Prepare the City's workforce for a challenging labor market

These goals included additional actions to help accomplish the goals. These included realigning zoning districts to reflect established densities, reducing densities while keeping a cohesive urban fabric, zoning for a range of housing types, improving amenities in neighborhoods, expanding homeownership and rehabilitating substandard housing. In addition to these housing-related actions, the Plan also called for increased workforce training to improve the economic prospects of Waterbury residents.

Land Use

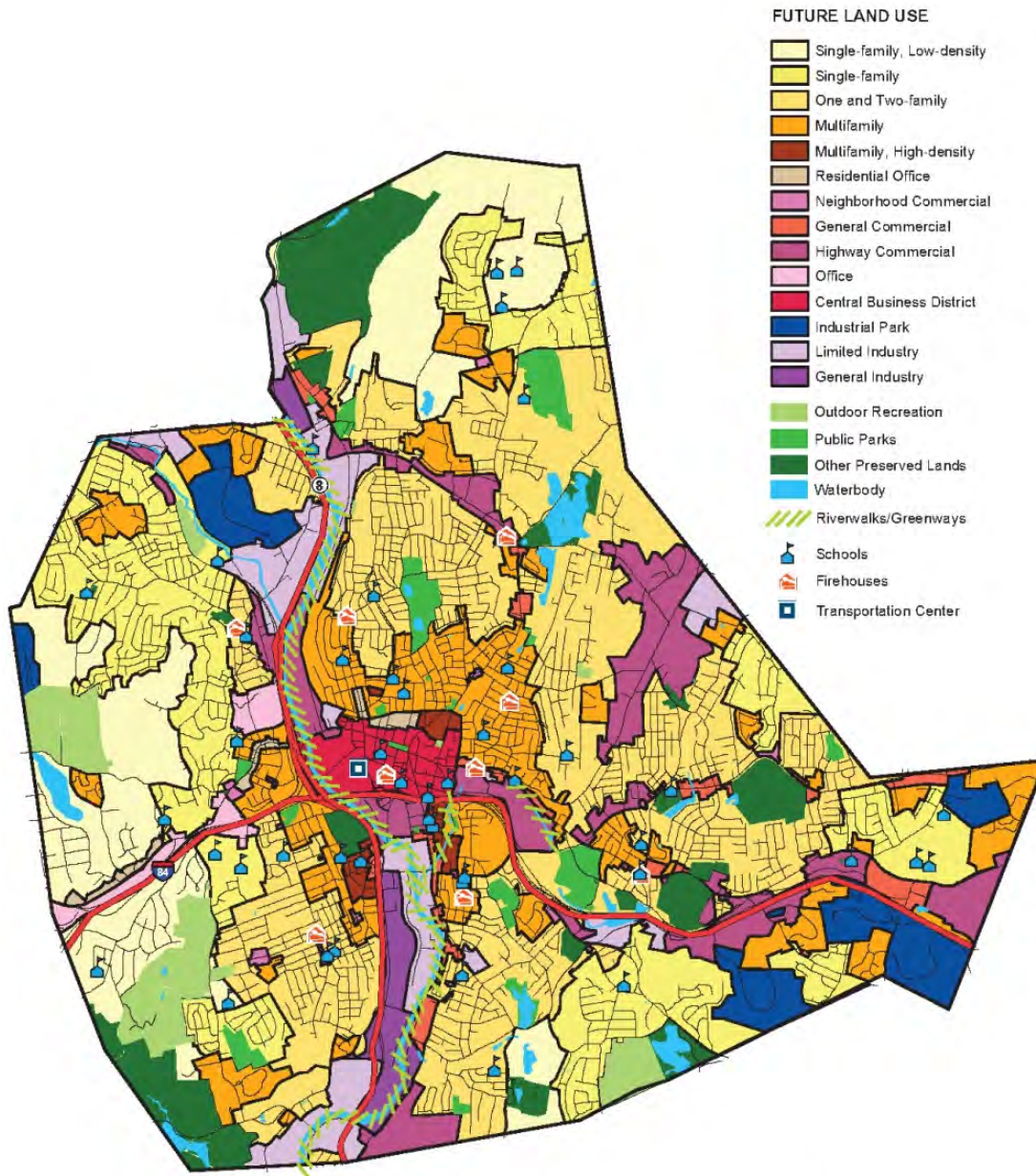
The Plan discusses the need to reform certain parts of the zoning code to reflect modern economic prospects and building practices. The Plan outlined seven specific reforms to be undertaken with regards to residential densities, uses and design:

- Allow for row house and townhouse development
- Create a new, lower-density single-family district
- Create special permit categories for senior housing that would allow for increased density in certain districts subject to higher design standards
- Create a functional cluster zoning option that would require a 33% open space set-aside but would not allow apartment buildings
- Replace existing regulations with new mixed-use zoning for areas transiting from residential to commercial use
- Reduce height and density in districts surrounding downtown but allow for mixed use
- Curtail the amount of multifamily zoning in outlying areas in Waterbury

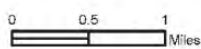
To accomplish many of these goals, the City updated its land use categories and its Future Land Use map. The map, which appears in the Comprehensive Plan, illustrates the

planned distribution of land uses including reduced densities in certain areas and new places for row houses and mixed-use areas.

Figure 5-4
Future Land Use Map



Note: Identified wetlands are illustrated on Figure 30 in Volume II, page 89.



Source:
City of Waterbury GIS Data

Map Prepared by:
Phillips Preiss Shapiro Associates, Inc.
Wilbur Smith Associates
May 2005



The Plan and Fair Housing

The Waterbury Plan specifically addresses possible fair housing concerns and directly responds to identified impediments to fair housing choice. In addition, the Plan indirectly addresses affordable housing throughout its recommendations.

In its review of possible impediments to fair housing choice, the Plan notes that there remains a significant amount of land throughout the City that allows modest densities conducive to affordable housing development. The City is already a dense place with a variety of large, historic single-family homes that have been subdivided and converted into apartments. It also has many older, large apartment buildings from a time when Waterbury had a significantly higher population.

The Plan also addresses fair housing in a variety of other ways. The plan's goals and objectives include the need to improve the economic prospects of lower-income residents through increased job training and help securing positions. It also takes into account the need to improve transportation through better transit options. These initiatives will allow lower-income residents greater access to information and greater means to improve their livelihood. This affects housing choice.

The Plan also outlines the goal of demolishing a public housing site which had been vacant. The Plan encourages the site to be sold and funds used to provide scatter-site housing throughout the South End neighborhood. This goal would have the effect of expanding fair housing choice outside an area of concentrated poverty.

➤ Fair Housing Achievement

The *Waterbury Plan of Conservation and Development* incorporates an array of policies that will have the effect of furthering fair housing aims.

These include a focus on mixed-use neighborhoods that provide a variety of housing types including multi-family complexes, walkable and transit-friendly communities to provide for those without vehicles, and job training recommendations to improve the economic prospects of low-income persons.

While the Plan recognizes the extent of land presently developable for multi-family housing, it also specifically seeks to reduce density by disallowing multi-family housing in outlying areas of the City. As a matter of policy, planners saw that the City was not adding residents and wanted to reduce the density allowed in far-flung parts of the City to account for the lack of growth. The Plan justifies this by saying that the remainder of the City still provides ample amount of space for multi-family housing developments.

G. Public Housing

The Housing Authority of the City of Waterbury (HACW) manages both traditional public housing and the Section 8 Housing Choice Voucher program.

i. Public Housing

As the primary provider of affordable housing in the City, HACW was involved in the process of creating this Analysis of Impediments. Its policies and procedures

were reviewed to determine if the Authority sufficiently promotes fair housing, and what practical steps the Authority could take to improve its fair housing initiatives.

a. Housing and Population

Housing Inventory

HACW owns and manages a total of 733 units of public housing.

The Housing Authority's portfolio includes one shuttered building at the Berkley Heights site. While the building has been closed for a number of years, the Authority cannot demolish the units due to the State's 1-for-1 replacement policy. The requirement to replace all demolished units is not financially feasible for the Authority.

The HACW public housing stock is detailed in Figure 5-5 below.

Figure 5-5
HACW Public Housing Developments, 2013

Development	Breakdown of Dwelling Units					Total Units
	0 Bedrooms	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ Bedrooms	
Berkley Heights	-	14	122	88	30	254
Bergin Apartments	6	70	-	-	-	76
Oak Terrace	-	-	6	42	6	54
Pearl Lake Apartments	-	-	-	33	6	39
Springbrook Apartments	-	-	12	22	22	56
Truman Apartments	-	-	8	36	30	74
Austin Road Apartments	-	-	-	36	-	36
South End Apartments	-	-	-	19	2	21
Scattered Sites	-	-	-	33	2	35
Hamden Avenue Apartments	-	-	-	9	1	10
Kelly Apartments	22	8	-	-	-	30
Franklin D. Roosevelt Apartments	32	16	-	-	-	48
Total Units	60	108	148	318	99	733

Source: Housing Authority of the City of Waterbury

Public Housing Population

Of the 733 households residing in HACW's communities in 2012, 59.6% were families with children and 28.2% were individuals/families with disabilities. The majority of households (70%) were White; Blacks represented 30% of tenant households. Counted separately, Hispanics accounted for 56% of public housing households. A majority (56.1%) of all households living in public housing were female head-of-household with children.

Minorities are overrepresented in public housing. While Black households accounted for 18% of all Waterbury households, they accounted for 30% of all tenant households. Similarly, Hispanics represented 25.2% of the City's households, but 56% of current residents.

Figure 5-6 details the demographics of Waterbury's public housing residents.



Figure 5-6
 Characteristics of Current Public Housing Residents, 2013

Total households	733	100.0%
Income level		
Extremely low income (30% or less of AMI)	646	88.1%
Very low income (30.1% to 50% of AMI)	73	10.0%
Low income (50.1% to 80% of AMI)	11	1.5%
Household type*		
Families with children	437	59.6%
Elderly	175	23.9%
Female head with children	411	56.1%
Member with a disability	207	28.2%
Race and ethnicity		
Black	-	30%
White	-	70%
Asian	-	0%
Hispanic**	-	56%
Characteristics by bedroom size		
0 Bedroom	-	8%
1 Bedroom	-	15%
2 Bedroom	-	21%
3 Bedroom	-	42%
4 Bedroom	-	11%
5+ Bedroom	-	2%

* Categories are not mutually exclusive.

** Hispanic ethnicity counted separately from race

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Housing Authority of City of Waterbury

Public Housing Wait List

HACW maintains a wait list of 1,524 families for public housing. Of these 69.4% are Hispanic households. Families with children represent 61.0% of the wait list while families with disabilities account for 17.7%. Families with three or more persons accounted for 31.4%.

Minorities are overrepresented on the public housing wait list. While Black households accounted for 18% of all Waterbury residents, they accounted for 45.3% of those on the wait list. Similarly, Hispanics represented 25.2% of City households, but 69.4% of the households on the wait list.

The public housing wait list was last opened in 2011 when 1,564 applicants were added.

The characteristics of the public housing wait list are detailed in Figure 5-7.



Figure 5-7
Housing Authority of the City of Waterbury, Public Housing Wait List, 2013

Total households	1,524	100.0%
Income level		
Extremely low income (30% or less of AMI)	1,318	86.5%
Very low income (30.1% to 50% of AMI)	169	11.1%
Low income (50.1% to 80% of AMI)	28	1.8%
Household type		
Families with children	930	61.0%
Elderly	12	0.8%
Member with a disability	270	17.7%
Race and ethnicity		
Black	482	45.3%
White	492	46.3%
Asian	4	0.4%
Hispanic**	738	69.4%
Household size		
1 Person	472	31.0%
2 Persons	510	33.5%
3 Persons	311	20.4%
4 Persons	139	9.1%
5 Persons	70	4.6%
6 or More Persons	22	1.4%

* Percent a reflection of those who identified their race when applying.

** Hispanic ethnicity counted separately from race

Note: Totals do not match due to unavailability of some data for some applicants or residents.

Source: Housing Authority of City of Waterbury



Black and Hispanic households are disproportionately represented on the public housing wait list.

Black households represent 18% of the City households; however, 30% of all public housing households and 45.3% of applicant households are Black. Hispanics represent 25.2% of the City households while they comprise 56% of public housing households and 69.4% of applicant households.

b. Section 504 Needs Assessment

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 require that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a PHA's administrative offices, applicant offices and other non-residential facilities must be accessible to persons with disabilities. The Uniform Federal Accessibility Standards (UFAS)



is the standard against which residential and non-residential spaces are judged to be accessible.

The regulations at 24 CFR 8.26 and HUD PIH Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes is to expand housing choice for people with disabilities.

Current Accessibility Profile

The Housing Authority's recently completed Needs Assessment evaluated the HA's 28 units designated as accessible. The assessment found only three units up to current accessibility codes without major modifications. All three of those units were two-bedroom configurations, which doesn't provide for a wide range of unit sizes for persons/families with disabilities.

The number of accessible units, by bedroom size is shown in Figure 5-8 below. Designated accessible units are units which met accessibility standards at the time of construction; currently up-to-code units comply with Section 504 requirements; and proposed units are the number of units needed to meet federal requirements.

Figure 5-8
Characteristics of Current Public Housing Residents, 2013

Number of Bedrooms	Designated Accessible*	Currently Up to Code**	Proposed	Total
Total	28	3	33	36
One Bedroom	8	0	18	18
Two Bedroom	8	3	9	12
Three Bedroom	4	0	4	4
Four Bedroom	1	0	1	1
Five Bedroom	1	0	1	1

* Designated accessible units were up to code at the time of being constructed.

** Only three units could be retained as accessible without major modifications.

Source: Housing Authority of the City of Waterbury

2011 Voluntary Compliance Agreement

Following a Section 504 review conducted by HUD, the Housing Authority was found to be out of compliance in two areas: program accessibility for persons with disabilities and access for persons with limited English proficiency. The Housing Authority entered into a Voluntary Compliance Agreement (VCA) to correct the necessary issues. A description of the VCA, its requirements, and steps taken so far to meet its requirements is contained in Section 5.C.ii.

c. Public Housing Admission and Continued Occupancy Plan (ACOP)

The ACOP is the Housing Authority's written statement of policies used to carry out its public housing program in accordance with federal law and regulations, and HUD requirements.



Non-Discrimination Policy

HACW's non-discrimination policy can be found in Chapter 1(d) of the ACOP. Compliance is pledged with all federal civil rights laws which protect public housing applicants and residents with equal treatment in all HACW programs and services. The ACOP states that HACW does not discriminate on the basis of race, color, sex, religion, familial status, disability, or national origin. The organization's policy also states that each applicant in any other particular group will be treated on an individual basis as part of the normal processing routine.

Reasonable Accommodation Policy

Chapter 1(e) sets forth HACW's reasonable accommodation policy. Participants with a disability must request a special accommodation in order to be treated differently than other non-disabled persons. In order to be considered as a person with a disability, the applicant or resident must certify that they meet the ADA definition of disability.

Requests for reasonable accommodation from persons with a disability will be granted upon verification that they meet the need presented by the disability and verification that the accommodation will not require significant difficulty or expense.

When accessible housing units become available, they are first offered to current, disabled occupants of another unit in the same development who are occupying a non-accessible unit, then to disabled residents of other developments, then to disabled applicants, and finally to other applicants not requiring accessible features should all other options not yield a resident.

Language Access Plan

Chapter 1(f) of the ACOP outlines HACW's policy on the translation of documents. The current policy says that, wherever feasible, the Housing Authority will train and hire bilingual staff to act as translators, use community resources to offer a translator, or work through a family member, friend or personally hired translator to pass along services offered by the Authority.

The Housing Authority is currently in the process of developing a Language Access Plan that will guide HACW in what documents to provide in various languages as well as other steps to improve service to persons with LEP.

Qualifications for Applying

To be eligible for public housing, applicants must qualify as a family. Chapter 2(b) of the ACOP defines "family" as two or more persons who intend to share residency, whose income and resources are available to meet the family's needs, and who will live together in HACW housing. They specifically include, though do not limit families to, those with or without children, an elderly family, a disabled family, a displaced family, a single person or two or more elderly persons living together.

A family is eligible for assistance if at least one family member is a citizen or eligible immigrant. Families that include eligible and ineligible individuals are referred to as mixed families. Such families will be given notice that their income-based assistance will be pro-rated and that they may request a hearing if they contest this determination.

In addition to this criterion, applicants must be able to pay rent, use facilities in a reasonable way, not create health or safety hazards, not interfere with the rights of others, not have been convicted of manufacturing drugs on assisted housing premises, and are not a registered sex offender, among other requirements.

Wait List Preferences

Chapter 4(c) establishes the wait list preference for applicants. The Authority uses the following admission preferences:

- Date and time of application
- Emergency preference for public housing residents displaced by a disaster
- Residency for families who live, work, or have been hired to work in Waterbury
- Preference for families that will ensure a broad range of incomes within each housing development to promote deconcentration of poverty
- Preference for a family whose Head or spouse or single member is an elderly or disabled person

It is the policy of HACW not to merge the wait lists for the Public Housing Program and the Housing Choice Voucher Program, as stated in Chapter 4(j). However, if the Housing Choice Voucher Program wait list is open when an applicant applies for the Public Housing Program, HACW must offer to place the family on both lists. Likewise, if the Public Housing Program wait list is open at the time an applicant applies for the Housing Choice Voucher Program, HACW must offer to place the family on both lists.

Income Targeting

Chapter 4(e) of the ACOP outlines HACW's income targeting policy. HACW will monitor its admissions to ensure that at least 40% of applicants admitted to public housing have incomes of less than 30% of the median household income. Chapter 4(h) describes HACW's de-concentration policy. The Authority, in conjunction with its requirement to target at least 40% of new admissions to extremely low-income families, will admit higher income families to lower income developments by skipping families on the wait list for deconcentration purposes. It will uniformly apply this methodology to all families; however, the ACOP does not specifically describe this methodology.

Integration Policy

Chapter 4(m) of the ACOP specifies HACW's integration policy. HACW states that it shall affirmatively further fair housing to reduce racial and national origin concentrations. To accomplish this, HACW shall not assign persons to a particular section of a community based on protected class status.

Unit Offers

Chapter 4(n) of the ACOP is reserved for a description of how the HACW plans to make unit offers while assuring non-discrimination. The ACOP is missing its description. Families may reject units for "good cause" including proximity to work, school, or childcare; or health-related issues. Additionally, applicants must accept a unit offer within one working day of the date the unit is shown. The Authority will make exceptions for those with a disability. If the unit is

refused, the applicant is removed from the wait list. Exceptions are made for medical reasons.



The Housing Authority does not allow residents to refuse a unit unless they can prove a medical reason for refusal, limiting the choice of those seeking public housing.

Allowing applicants to refuse a unit at least twice without removal from the wait list increases housing choice without placing an extreme burden on the Housing Authority.

Pet Policy

Chapter 10 defines HACW's pet policies. A person with a disability may be excluded from the pet policy if they complete the reasonable accommodation process, the animal has been trained to assist with a specified disability and the animal actually assists the person with the specified disability.

The Housing Authority does differentiate between companion and service animals, stating that a service animal is one trained to provide actual assistance to a person, while a companion animal is one that helps someone cope with a disability.

Grievance Policy

Chapter 14 establishes a procedure for residents to present grievances to HACW. Any filed grievance shall be presented orally or in writing to HACW's office or to the housing management office. A reasonable time is considered to be within five calendar days after the day of the action or failure to act, which is the basis for the grievance. The policy states that the first step in resolving the issue is an informal hearing to discuss the grievance without the necessity of a formal hearing.

After exhausting the informal hearing procedures, a complainant shall be entitled to a formal hearing before the Hearing Officer. The Hearing Officer shall give HACW and the complainant a written decision, including the reasons for the decision, within five calendar days following the formal hearing. The Hearing Officer may render a decision on the case without proceeding with the hearing if they determine that the issues has been previously decided in another proceeding. The decision of the Hearing Officer shall be binding on HACW, which shall take all actions necessary to carry out the decision, unless the Housing Authority's Executive Director determines within a reasonable time that the grievance does not concern an action involving the resident's lease which adversely affects the resident's rights, duties, welfare or status, or that the decision of the Hearing Officer is contrary to applicable laws.



ii. Section 8 Housing Choice Voucher Program

In addition to public housing, HACW is the administrator of the Section 8 Housing Choice Voucher program for Waterbury. As of January, 2013, there were 1,947 Section 8 voucher holders in the program.

a. Housing and Population

Using a Section 8 Voucher

When a new applicant is provided with a voucher, they are given 90 days to secure private rental housing. HACW reported that, generally, 50%-60% of applicants return their vouchers to the Authority due to their inability to secure private rental housing during the 90-day period. Under certain circumstances, HACW will grant extensions to applicants. These circumstances may include medical emergencies such as hospitalization, difficulty finding a unit due to disability accessibility requirements, or satisfactory evidence that the family has made a reasonable effort to locate a unit, including seeking the assistance of the Authority, during the initial ninety-day period.

HACW advises voucher holders of their mobility options and cooperates with agencies throughout the area. According to interviews with HACW staff, the Authority is presently absorbing voucher holders into the area. Generally, most people porting into Waterbury are arriving from New Haven.



Only 50% to 60% of voucher holders are able to find private rental housing within the 90-day period allotted by HACW.

The relative inability of voucher holders to find decent, affordable rental housing within the allowed time may indicate there are not enough quality units in appropriate areas with willing landlords to meet the Section 8 voucher needs.

Section 8 Households

Of the 1,939 Section 8 voucher holders in HACW's jurisdiction, 48.4% were families with children and 39.9% were individuals/families with disabilities. The majority of households (72%) were White; Blacks represented 28% of tenant households. Hispanics, counted independently of race, accounted for 54% of Section 8 voucher holders. Of all Section 8 households, 44.4% were female head-of-household with children. Similar to public housing, Black and Hispanic households are over-represented in families with Section 8 voucher holders.

Figure 5-9 details the demographics of Waterbury's Section 8 voucher holders.



Figure 5-9
 Characteristics of Current Section 8 Voucher Holders, 2013

Current Section 8 Voucher Holders		
Total households	1,939	100.0%
Income level		
Extremely low income (30% or less of AMI)	1,505	77.6%
Very low income (30.1% to 50% of AMI)	385	19.9%
Low income (50.1% to 80% of AMI)	53	2.7%
Household type*		
Families with children	942	48.6%
Elderly	372	19.2%
Female head with children	865	44.6%
Member with a disability	776	40.0%
Race and ethnicity		
Black	-	28%
White	-	72%
Asian	-	0%
Hispanic**	-	54%
Characteristics by bedroom size		
0 Bedroom	-	2%
1 Bedroom	-	24%
2 Bedroom	-	36%
3 Bedroom	-	32%
4 Bedroom	-	7%
5+ Bedroom	-	0%

* Categories are not mutually exclusive.

** Hispanic ethnicity counted separately from race

Note: Totals do not match due to inavailability of some data for some applicants or residents.

Source: Housing Authority of City of Waterbury



Minorities are overrepresented in both public housing and the Section 8 voucher program.

While Black households represent 18% of all Waterbury households, 30% of public housing residents and 28% of Section 8 voucher holders are Black. Similarly, Hispanics represent 25.2% of City households, but account for 56% of public housing residents and 54% of Section 8 voucher holders.

Location of HACW Section 8 Voucher Holders

Among the 1,939 Section 8 voucher holders under the jurisdiction of HACW, almost all live within the City limits. Voucher holders are scattered throughout the City; however, the majority live in areas north and east of downtown



Waterbury. Of the 1,939 voucher holders, 380 live within racially/ethnically concentrated areas of poverty.

The map on the following page shows the geographic location of Section 8 voucher holders. It is evident that the vast majority of voucher holders (80.1%) are able to obtain decent, affordable housing in the City outside of RCAPs/ECAPs.

Finding Housing with a Section 8 Voucher

In order for Section 8 voucher holders to find decent, affordable private rental housing units, there must be an adequate supply of such units throughout Waterbury. HACW's Section 8 Admin Plan states that the Housing Authority maintains a list of interested landlords and available units that is updated quarterly. In addition, the staff initiates personal contact with private property owners and managers to encourage active participation in the program.

According to the Admin Plan, families are encouraged to search for housing in non-impacted areas (i.e., outside of RCAPs/ECAPs), and the Housing Authority will provide assistance to families wishing to do so.

In order to accept a unit into the Section 8 program, HACW conducts an inspection to determine if it meets Section 8 Housing Quality Standards (HQS). According to interviews with building inspectors and local contacts, some buildings do not meet housing quality inspections, making finding housing with a voucher more difficult.

The Authority pays up to 120% of the HUD fair market rent (FMR) payment standard throughout Waterbury. This allows voucher holders a wider choice of neighborhoods, but may also cause the authority to pay higher-than-necessary rents in lower-cost areas. For instance, neighborhoods with lower rents may only require 90% of the FMR while more stable areas with better housing stock may need 120% of the FMR to entice private landlords to participate in the Section 8 program. A tiered payment standard would level the playing field between high-cost and lower-cost neighborhoods.

Section 8 Voucher Wait List

HACW maintains a wait list of families seeking Section 8 tenant-based assistance. The wait list was last opened in 2013, during which time a total of 15,000 families registered for vouchers online and an additional 2,000 families registered onsite. The voucher availability was publicized in various local newspapers. While receiving nearly 17,000 applications for vouchers, only 40-100 were available.



The Housing Authority may be unnecessarily funding Section 8 vouchers at 120% of the area Fair Market Rent.

Funding Section 8 vouchers at levels that are comparable to neighborhood market rents allows voucher holders to move to neighborhoods across the City. By providing a higher payment standard in higher-cost neighborhoods, the Authority encourages mobility for households interested in relocating outside of RCAPs/ECAPs; however, payment standards that exceed market rents are unnecessary. By providing payment standards that are comparable to market rents in neighborhoods across the City, the Authority could issue more vouchers at lower rates.

b. Section 8 Admin Plan

The Section 8 Housing Choice Voucher Admin Plan outlines policies use to govern the administration of the Section 8 Housing Choice Voucher Program in Waterbury.

Anti-Discrimination Policy

Chapter 1(c) of the Section 8 Admin Plan states HACW's anti-discrimination policy. According to the Plan, HACW shall not deny any family or individual the equal opportunity to apply for or receive assistance on the basis of race, color, sex, religion, creed, national or ethnic origin, age, familial or marital status, handicap or disability or sexual orientation. As a matter of policy, civil rights and fair housing information is provided to clients during the family briefing session and as part of the voucher holder's briefing packet.

HACW staff is required to attend fair housing training, including training on the provision of reasonable accommodation to persons with disabilities.

Reasonable Accommodation Policy

HACW's policy relative to reasonable accommodation is outlined in Chapter 1(d). Participants with a disability must request a special accommodation in order to be treated differently than other (non-disabled) persons. In order to be considered as a person with a disability, the applicant or resident must certify that they meet the ADA definition of disability. HACW then requires written verification from a professional third party that the person needs the specific accommodation due to their disability.

As stated in Chapter 1(d), all persons who wish to apply for any of HACW's programs may request an accessible format as a reasonable accommodation. All Housing Authority mailings will be made available in such formats upon request.

Chapter 1(e) of the Admin Plan outlines HACW's policy on the translation of documents and interpreters for persons with limited English proficiency (LEP). This policy mirrors the ACOP policy. Additionally, the Authority is presently undertaking a Language Access Plan to better serve LEP persons.

Definition of a Family

To be eligible to receive a Section 8 Housing Choice Voucher, an applicant must qualify as a family. HACW employs the same definition of family as in its ACOP. Similarly, mixed families are guided by a policy identical to its ACOP policy.

Wait List

The maintenance of the Section 8 wait list is outlined in Chapter 4. HACW uses the following local preference system:

- Applicants admitted under “Special Circumstances” which includes displaced families, families residing in multi-family rental housing when HUD sells or demolishes the project, families residing in a Section 8 HAP near the end of its contract term, and non-purchasing families residing in HOPE 1 or HOPE 2 projects
- Applicants admitted under targeted funding
- Families displaced because of demolition, disposition or closure of a state-funded housing program

In addition, the Section 8 Admin Plan says that elderly and disabled families and displaced single persons will always be selected before other single persons.

Encouraging Housing outside RCAP/ECAPs

Chapter 8(c) describes HACW's policy about encouraging participation outside of areas of LMI or minority concentration. The policy states that families are encouraged to search for housing outside racially/ethnically concentrated areas of poverty during the family briefings and that HACW will provide assistance to families who wish to do so. HACW provides direct contact with landlords, formal and informal discussions with social service agencies, and meetings with rental referral companies to assist in finding housing outside impacted areas. Additionally, the Housing Authority maintains a listing of available housing submitted by owners and by neighborhoods to assist in finding housing outside impacted areas. The information is provided at briefings and is available at the Authority's welcome desk.

The Authority also periodically meets with new landlords in an effort to promote the advantages of the Section 8 program in areas of the City outside concentrations of low-income or minority families. Evidence of the Authority's mobility initiatives is illustrated on Map 5-1.

Complaints and Appeals

Chapter 18 of the Admin Plan establishes a process for applicants to present complaints and appeal decisions of the Authority. HACW must provide applicants with the opportunity for an informal review of decisions denying:

- Listing on HACW's wait list
- Issuance of a voucher
- Participation in the program

A request for an informal review must be received in writing by the close of the business day, no later than 10 days from the date of HACW's notification of denial of assistance.

c. Language Access Plan

According to current policies related to persons with LEP, the Housing Authority says it will take reasonable steps to maintain verbal contact which includes, where feasible, hiring and training bilingual staff to act as interpreters. Additionally, the HA says it will provide written translations of vital documents for each language group that constitutes 5% of the population or 1,000 persons, whichever is less.

HACW is presently in the process of preparing a Language Access Plan (LAP) to provide persons with LEP with meaningful access to agency operated housing assistance and social service programs. According to guidance from HUD, forming an LAP is the best way to show compliance with the requirement to make programs accessible to persons with LEP.

The LAP will determine what language assistance is necessary for the community. Persons with LEP may be entitled to free language assistance with respect to a HACW program, benefit, or right. This includes translation services of written messages and interpretation services of oral or spoken messages. In order to determine what language services are needed, HACW must conduct the four-factor analysis. This analysis evaluates the need for translation and/or other accommodations based on the following four factors:

- The number or proportion of persons with LEP to be served or likely to be encountered by the program
- The frequency with which persons with LEP come into contact with the program
- The nature and importance of the program, activity or services provided by the program, and
- Resources available to the grantee vs. costs

➤ Fair Housing Achievement

The Housing Authority is currently undertaking a Language Access Plan to better serve persons with limited English proficiency.

A Language Access Plan helps determine what services, whether written or oral, are needed to serve persons who speak English as a second language.

iii. Privately Assisted Housing and HUD Subsidized Housing

Types of Privately Assisted Housing

In addition to the private housing market, there is a substantial privately owned assisted housing inventory in Waterbury. Privately assisted housing is privately owned but affordable due to the funding source used to develop the housing units. This type of subsidized housing differs from public housing that is owned by a government entity. Eligible resident households typically include those who are elderly (either 55 or 62 years of age or older), low and moderate income (80% of median income or less), or persons with disabilities. Financing for these affordable

units typically comes from state and federal sources such as the Low Income Housing Tax Credit Program (LIHTC); the U.S. Department of Agriculture's Section 515 Program; HUD's Section 202 (elderly), Section 811 (disabled), Section 236 and Section 221(d) (family) Programs.

Assisted Housing in Waterbury

The location of all public housing and privately assisted housing in Waterbury is depicted on the map on the following page. Much of the publicly and privately assisted housing is clustered in or near downtown Waterbury. While 19.6% of Section 8 voucher holders live within racially/ethnically concentrated areas of poverty, 42.6% of publicly and privately assisted housing is located in these areas. Figure 5-10 lists all subsidized housing in Waterbury. The majority of assisted housing serves minority residents and female-headed households with children.

Notably, 28 of the assisted housing communities in Waterbury are located outside of RCAPs/ECAPs. On the chart on the following page, those housing complexes highlighted in blue are located within RCAPs/ECAPs. Of the 4,574 total units of privately assisted and HUD-subsidized housing, 1,392 (30.4%) are located within these areas, compared to 42.6% of housing complexes. Therefore, as a percent, there are even fewer assisted housing units located in RCAPs/ECAPS than complexes.



Female-headed households and minority households are disproportionately represented in subsidized housing in Waterbury.

This trend reveals the lack of affordable housing opportunities for members of the protected classes, and the continuing need for subsidized housing in Waterbury.



Figure 5-10
Privately Assisted and HUD-Subsidized Housing, 2008

Name	Funding Program	Total Units	Percent Occupied	Total People	% Female Head of HH	Percent Disabled	Percent Age 62 and Up	Percent Minority
136-138 LOCUST STREET	LIHTC	3	100%	-	-	-	-	-
14 WOOD STREET	LIHTC	3	100%	-	-	-	-	-
156 BISHOP ST	LIHTC	6	100%	-	-	-	-	-
262 WALNUT STREET	LIHTC	7	100%	-	-	-	-	-
29 COOKE STREET	LIHTC	20	100%	-	-	-	-	-
296 WILLOW STREET	LIHTC	3	100%	-	-	-	-	-
30-32 COOKE STREET	LIHTC	3	100%	-	-	-	-	-
50-60 EAST CLAY STREET	LIHTC	8	100%	-	-	-	-	-
51 CATHERINE STREET	LIHTC	8	100%	-	-	-	-	-
55 CATHERINE STREET	LIHTC	8	100%	-	-	-	-	-
57-61 LUDLOW STREET	LIHTC	7	100%	-	-	-	-	-
6 BURTON STREET	LIHTC	7	100%	-	-	-	-	-
61-63 WARD STREET	LIHTC	3	100%	-	-	-	-	-
63-65 CHERRY STREET	LIHTC	6	100%	-	-	-	-	-
68-72 CONGRESS AVENUE	LIHTC	7	86%	-	-	-	-	-
701 SOUTH MAIN STREET	LIHTC	6	100%	-	-	-	-	-
AUSTIN HEIGHTS	S8 NC/SR	104	92%	226	80%	13%	10%	82%
AUSTIN RD & S END TURNKY	PH	161	88%	485	96%	20%	3%	90%
BERKELEY HEIGHTS	PH	300	77%	647	90%	14%	12%	96%
BYAM VILLAGE	LIHTC	46	100%	-	-	-	-	-
BYAM VILLAGE	S8 NC/SR	46	97%	100	85%	39%	17%	35%
CHERRY STREET HEIGHTS	LIHTC	6	100%	-	-	-	-	-
COUNTRY VILLAGE	S8 NC/SR	229	97%	613	95%	8%	3%	85%
DEERFIELD GARDENS	MF/Other	266	86%	146	81%	38%	38%	23%
DEWBERRY HEIGHTS	S8 NC/SR	42	90%	117	88%	10%	5%	77%
DIAMOND COURT	LIHTC	80	40%	-	-	-	-	-
EAST GATE APTS	S236	190	87%	68	85%	0%	100%	6%
EASTGATE II	S8 NC/SR	44	99%	47	73%	83%	86%	7%
EXCHANGE PLACE TOWERS	S8 NC/SR	150	96%	152	68%	98%	67%	58%
FIELDSTONE COURT A.K.A. PARKWOOD APTS	MF/Other	18	81%	53	76%	0%	18%	29%
FROST HOMESTEAD	S236	63	100%	-	-	-	-	-
GRACE HOUSE	MF/Other	40	98%	41	62%	0%	100%	76%
INNER CITY HOMES	MF/Other	75	93%	209	85%	13%	21%	29%
JERSEY STREET APTS	MF/Other	16	96%	-	-	-	-	-
JOSEPHINE TOWERS	S8 NC/SR	125	96%	142	53%	100%	80%	30%
LA UREL ESTATES	S8 NC/SR	277	96%	678	94%	16%	8%	89%
LOCUST STREET	LIHTC	17	100%	-	-	-	-	-
NORTH SQUARE GATEWAY TERRACE	MF/Other	14	98%	17	64%	100%	21%	64%
NORTHWOOD APTS.	MF/Other	182	93%	460	94%	12%	3%	90%
NOTTINGHAM TOWERS	S8 NC/SR	165	98%	162	76%	0%	99%	28%
NSA I ENTERPRISE/ABBOTT APTS	S8 NC/SR	187	100%	225	60%	101%	43%	87%
NSA II/SCHOOLHOUSE APTS	S8 NC/SR	213	99%	274	50%	100%	33%	82%
PLAZA ON THE GREEN	S8 NC/SR	157	95%	182	65%	86%	87%	67%
PORTER ST APTS.	MF/Other	32	94%	92	88%	19%	16%	78%
PROSPECT TOWERS	MF/Other	151	97%	165	47%	54%	76%	56%
ROBIN RIDGE APARTMENTS	S236	144	100%	31	71%	67%	90%	16%
SARFIELD TERRACE	MF/Other	11	98%	35	83%	9%	8%	58%
SUNSET GARDENS	S236	231	90%	64	78%	54%	64%	8%
THE ELTON HOME FOR THE AGED	LIHTC	92	76%	-	-	-	-	-
TRUMAN APTS	PH	246	89%	622	75%	22%	35%	81%
VALLEY MALL MANOR	S8 NC/SR	56	100%	22	73%	40%	77%	5%
VILLAGWOOD APARTMENTS	MF/Other	164	90%	333	92%	15%	5%	83%
WATERTOWN CROSSING	LIHTC	108	100%	-	-	-	-	-
WILLOW MUTUAL HOUSING	LIHTC	21	100%	-	-	-	-	-

Note: HUD's Picture of Subsidized Housing is given as is. Missing data is noted with a (-) mark. Additional properties with absolutely no data were excluded.

Source: HUD, 2008 Picture of Subsidized Housing

*Housing highlighted in light blue is located within racially or ethnically concentrated areas of poverty



H. Taxes

Taxes and Fair Housing

Taxes impact housing affordability. While not an impediment to fair housing choice in and of themselves, real estate taxes can impact the choice that households make with regard to where to live. Tax increases can be burdensome to low-income homeowners, and increases are usually passed on to renters through rent increases. Tax rates for specific districts and the assessed value of all properties are the two major calculations used to determine revenues collected by a jurisdiction. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

A straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc.) are assigned to balance each community's unique set of resources and needs. These factors and others that are out of the municipality's control must be considered when performing tax rate comparisons.

Tax Rates in Waterbury

There are no restrictions in Connecticut affecting a jurisdiction's ability to levy taxes. This allows local governments to match service needs with revenue. The caveat, however, is that jurisdictions have the ability to levy taxes beyond the affordability of lower-income residents.

As mandated by the State of Connecticut, Waterbury's assessment of the value of property is equal to 70% of fair market value. Tax rates are levied on every \$1000 dollars of assessed value and are placed into the City's general budget for distribution per line item. Waterbury does not have separate taxation districts for fire, parks, schools, and libraries as often found in other communities nationwide.

Regional Tax Rates

For the purpose of comparing housing affordability, only real estate millage rates were included. The majority of cities in Connecticut, including Waterbury, have the same millage rate for real estate, motor vehicle, and personal property. A few jurisdictions, most notably Stamford, New Haven, and Norwalk, set different millage rates on an assortment of taxable items.

According to Figure 5-11, Waterbury has the highest taxation rate amongst communities in its Primary Metropolitan Statistical Area (PMSA). The second highest taxation rate in the PMSA is Naugatuck, which has the second highest population in the area. This follows the general trend of more populated cities having higher taxation rates than less populated areas. The remaining communities listed in the table are towns or villages and have similar taxation rates at a minimum of 10 millage points lower than Waterbury.

According to Figure 5-12, Waterbury has the second highest taxation rate among Connecticut's largest cities. Yet, this is not significantly higher than Connecticut's largest cities as Bridgeport, New Haven, New Britain all have millage rates within 5 millage points of Waterbury.

Figure 5-11

Tax Rates in the Waterbury Primary Metropolitan Statistical Area (PMSA), 2013

Municipality	2013 Tax Rate	Municipality	2013 Tax Rate
New Haven County		Litchfield County	
Middlebury	28.07	Bethlehem	20.50
Naugatuck	33.55	Thomaston	32.83
Prospect	27.58	Watertown	24.23
Southbury	21.20	Woodbury	22.58
Union City	23.59		
Waterbury	41.82		
Wolcott	25.27		

Tax rates only include real estate millage rates

Figure 5-12

Tax Rates in Connecticut's Largest Cities, 2013

Municipality	2013 Tax Rates	Population
Largest Connecticut Cities		
Bridgeport	41.11	144,229
New Haven	38.88	129,779
Hartford	74.29	124,775
Stamford	17.89	122,643
Waterbury	41.8184	110,366
Norwalk	21.377	85,603
Danbury	22.45	80,893
New Britain	36.63	73,206

Tax rates only include real estate millage rates

Connecticut Laws Affecting Tax Rates

Connecticut's policy of requiring reassessment every five years minimizes inequity in the system of taxation, as changes in assessed value keep pace with changes in market value. In states that do not require periodic reassessment, the outdated assessed values continue to apply to 1) neighborhoods that are in decline, resulting in over-taxation on poorer residents, and 2) neighborhoods where values have increased, resulting in under-taxation on those who are prospering.

Connecticut law requires municipalities to provide property tax relief for special-needs populations through a number of exemptions. These exemptions are extended to blind persons, veterans, disabled servicemen and veterans, and totally disabled persons. Total personal property including real estate, motor vehicles, and other miscellaneous items are included in these exemptions. Additionally, Connecticut statutes mandate significant exemptions on real estate property for disabled veterans with severe disabilities. It is the property owner's responsibility to apply for these exemptions as provided by law. Tax exemptions are not extended to senior citizens in Connecticut.

Municipalities in Connecticut also have the option to extend additional exemptions, beyond what is mandated by Connecticut statutes, to veterans, totally disabled persons, and blind persons. The maximum additional exemption is capped by State statutes depending on the particular group. Municipalities may also provide property tax credits for affordable housing deed restrictions. These deeds require residing families to be earning 80% or less of area



median income. To date, the City of Waterbury has chosen not to provide additional exemptions beyond those required by State statutes. This can largely be explained by the reimbursement policy. Generally, the State reimburses municipalities one-third of the taxes lost through exemptions and municipalities shoulder the remaining two-thirds.

According to information provided by Waterbury's budget and assessment offices, the City is heavily reliant on property taxes to fund the City's general budget. Approximately 55% the City's general budget is funded through property taxes. The remaining 45% of the budget is mostly funded from the State for education. The City's heavily reliance on property taxes and state funding is the result of no city income tax. The majority of school funding (73%) is reliant on state funding. Remaining school funding mainly comes from property taxes.



Waterbury has the highest tax rate of all surrounding municipalities and the second-highest tax rate of all large cities in Connecticut.

Higher rates can limit housing choice for LMI persons to live in these areas.

I. Public Transit

Transit and Fair Housing

Households without a vehicle, which in most cases are primarily low and moderate income households, are at a disadvantage in accessing jobs and services if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access, employment is potentially at risk and the ability to remain housed is threatened. The linkages between residential areas (of concentrations of minority and LMI persons) and employment opportunities are key to expanding fair housing choice.

Ridership in Waterbury

According to the 2007-11 American Community Survey, there were 2,763 transit-dependent households in Waterbury, comprising 6.1% of all households.

The vast majority of City residents (90.9%) drove to work, with 80.0% driving alone. Throughout Waterbury, only 3.9% of residents utilized public transportation to get to work. Black and Hispanic households were far more likely to use public transportation to travel to work than White and Asian households. Across the City, only 2.2% of White households used public transit, compared to 6.5% of Black households and 7.7% of Hispanic households. Hispanic households also had higher rates of carpooling and walking to work compared to the City as a whole.

Figure 5-13
Means of Transportation to Work by Race/Ethnicity, 2011

Means of Transportation to Work	Total		White		Black		Asian		Hispanic*	
Total	45,606	100.0%	29,192	100.0%	8,045	100.0%	1,013	100.0%	11,502	100.0%
Drove Vehicle Alone	36,476	80.0%	24,891	85.3%	6,016	74.8%	839	82.8%	7,703	67.0%
Carpool	4,991	10.9%	2,606	8.9%	961	11.9%	125	12.3%	1,870	16.3%
Public Transportation	1,769	3.9%	651	2.2%	521	6.5%	0	0.0%	880	7.7%
Walked	1,182	2.6%	453	1.6%	258	3.2%	24	2.4%	609	5.3%
Taxi, Motorcycle, Bike or Other Means	594	1.3%	223	0.8%	147	1.8%	11	1.1%	223	1.9%
Worked at Home	594	1.3%	368	1.3%	142	1.8%	14	1.4%	217	1.9%

*Hispanic ethnicity is counted independently of race.

Source: U.S. Census Bureau, 2007-2011 American Community Survey (B08105A, B08105B, B08105D, B08105I)

Connecticut DOT, CT Transit and the Waterbury Branch

Public transportation in Waterbury falls under the Waterbury Section of CT Transit, the state-wide provider of public transportation services in Connecticut. CT Transit contracts with Northeast Transportation Company to provide service in the Waterbury Area. CT Transit also provides bus services in the Hartford, New Haven, Stamford, New Britain, Bristol, Meriden and Wallingford areas. CT Transit is part of the Connecticut Department of Transportation's Office of Transit and Ridesharing.

According to the American Public Transportation Association 2012 Fact Book, Waterbury's bus service provided 2,773,300 transit trips in 2010. This made it the 208th largest transit system in the nation.

Waterbury is also served by regional rail services offered by New York's Metropolitan Transit Authority (MTA) and Connecticut DOT's Office of Rail. The service, on the New Haven Line's Waterbury Branch, provides connections between Waterbury and New Haven where further connections are available to New York City and other regional destinations. During the interview process, community stakeholders said that the branch line was often late and consistently in need of repairs to make the line function. The line recently shut down for routine maintenance, repairs to a variety of bridges, and switch replacements.

i. Destinations and Routes

Bus routes in Waterbury form a hub-and-spoke system originating in downtown Waterbury. Transit routes cover the majority of the City of Waterbury. When accounting for the one-half mile most people are willing to walk to reach a bus stop, most City residents can access transit. The best service is offered along East Main Street, West Main Street, and North Main Street.

The map on the following page illustrates the bus stops in Waterbury. It does not, however, account for frequency of service or late night or weekend service.

Bus service also includes the City's Tripper Routes. These special services operate a limited number of times during the morning and afternoon rush hours to connect people to major employment centers not normally covered by transit. For instance, certain industrial parks in the north of the City are directly connected to the City green. These types of routes expand the job opportunities for those dependent on transit; however, transit is generally constrained to the City itself and does not extend far beyond the City. This can limit access to regional employment centers.



Recently, the City expanded transit coverage into the evening. Through the concerted efforts of local elected officials and residents, bus service increased beyond 6:30 PM. Certain routes now run beyond midnight, expanding the reach of the transit system and providing greater access to non-traditional jobs and after-work programs.

> Fair Housing Achievement

Waterbury is actively expanding opportunity for LMI persons by increasing late night transit service and providing reverse transit commute opportunities.

Waterbury recently expanded late-night transit service, offering bus trips beyond midnight on certain routes rather than ending service after 6 PM.

ii. Accessibility

All CT Transit fixed-route buses are equipped with wheelchair lifts or ramps, in accordance with the American with Disabilities Act (ADA). For those unable to access fixed-route bus services, CT Transit provides ADA paratransit services throughout the region.

All commuter trains are equipped for people with disabilities; however, not all stations are accessible for passengers. According to the MTA, the Waterbury Station on the New Haven line is accessible; however, seven other stations on the line are not wheelchair accessible.

iii. Transportation Planning

City of Waterbury Plan of Conservation and Development

As part of its Comprehensive Plan, the City studied transportation options. To guide future investment decisions, the Plan outlined specific vision statements for transit, which include the following:

- Improve all three dimensions of transit service: coverage, frequency, and facilities as the need for transit increases in the City.
- Coordinate all modes of transit: local bus, long-distance bus, and rail.
- Promote free circulation of traffic, but not at the expense of on-street parking in commercial corridors and pedestrian circulation.
- Partner with the CNV-COG to work closely with ConnDOT to ensure that the City's needs are met when the I-84 and state highways are widened or reconfigured.
- Promote safe and convenient pedestrian and bicycle facilities in appropriate locations to meet existing and future demand.

Recommended Improvements

Using those vision statements as a guide for investment, the Plan outlined specific strategies for the City. These include the following:

- Improve waiting areas and facilities at Exchange Place and throughout the system
- Consolidate all transit services into a new transportation center
- Advocate for improvements to the Waterbury Branch rail line

These types of improvements are important to improving the reliability and comfort of using transit. The Plan also discusses orienting development around existing transit routes and building dense development around the proposed transit center. Such development can make using transit easier and provides an opportunity to incorporate affordable housing.



6. Evaluation of Private Sector Policies

A. Mortgage Lending Practices

Home Mortgage Disclosure Act

Under the terms of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.), any commercial lending institution that makes five or more home mortgage loans must report all residential loan activity to the Federal Reserve Bank under the terms of the Home Mortgage Disclosure Act (HMDA). The HMDA regulations require most institutions involved in lending to comply and report information on loans denied, withdrawn, or incomplete by race, sex, and income of the applicant. The information from the HMDA statements assists in determining whether financial institutions are serving the housing needs of their communities. The data also helps to identify possible discriminatory lending practices and patterns.

Using HMDA

The most recent HMDA data available for Waterbury is from 2009 to 2011. Reviewing this data helps to determine the need to encourage area lenders, other business lenders and the community at large to actively promote existing programs and develop new programs to assist residents in securing home mortgage loans. The data focuses on the number of homeowner mortgage applications received by lenders for home purchase of one-to-four-family dwellings and manufactured housing units across census tracts in the City. The information provided is for the primary applicant only. Co-applicants were not included in the analysis. In addition, where no information is provided or categorized as not applicable, no analysis has been conducted due to lack of information.

Figure 6-1 summarizes three years of HMDA data by race, ethnicity, and action taken on the applications, followed by detailed analysis. Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.

Figure 6-1
Cumulative Mortgage Data Summary Report, 2009-2011

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	3,389	38.4%	1,580	46.6%	108	3.2%	466	13.8%	1,175	34.7%
Refinancing	4,751	53.8%	1,584	33.3%	225	4.7%	1,344	28.3%	1,381	29.1%
Home Improvement	697	7.9%	224	32.1%	30	4.3%	362	51.9%	58	8.3%
Loan Type										
Conventional	4,505	51.0%	1,815	40.3%	204	4.5%	1,341	29.8%	963	21.4%
FHA	4,094	46.3%	1,483	36.2%	143	3.5%	792	19.3%	1,566	38.3%
VA	236	2.7%	90	38.1%	16	6.8%	38	16.1%	84	35.6%
FSA/RHS	2	0.0%	0	0.0%	0	0.0%	1	50.0%	1	50.0%
Property Type										
One to four-family unit	8,828	99.9%	3,386	38.4%	363	4.1%	2,168	24.6%	2,611	29.6%
Manufactured housing unit	9	0.1%	2	22.2%	0	0.0%	4	44.4%	3	33.3%
Applicant Race										
Native American	57	0.6%	14	24.6%	1	1.8%	25	43.9%	15	26.3%
Asian	150	1.7%	51	34.0%	9	6.0%	48	32.0%	40	26.7%
Black	952	10.8%	371	39.0%	43	4.5%	282	29.6%	205	21.5%
Hawaiian	51	0.6%	19	37.3%	2	3.9%	19	37.3%	10	19.6%
White	5,695	64.4%	2,551	44.8%	253	4.4%	1,417	24.9%	1,308	23.0%
No information	1,188	13.4%	381	32.1%	55	4.6%	381	32.1%	293	24.7%
Not applicable	744	8.4%	1	0.1%	0	0.0%	0	0.0%	743	99.9%
Hispanic*	1,269	14.4%	493	38.8%	65	5.1%	376	29.6%	286	22.5%
Total	8,837	100.0%	3,388	38.3%	363	4.1%	2,172	24.6%	2,614	29.6%

Source: Federal Financial Institutions Examination Council, 2009 to 2011

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total figures.

* Hispanic ethnicity is counted independently of race.

i. Home Mortgage Trends

Across Waterbury during the last three years, lenders received 3,389 home purchase mortgage applications, 4,751 applications for mortgage refinancing and 697 applications for home improvement equity loans.

Home purchase loans were the most likely to be successful, with 46.6% of loans originated. This represents a higher rate of origination than refinancing loans and home improvement loans. While 46.6% of home purchase loans were originated, a significant number were withdrawn/incomplete (34.7%). An additional 3.2% were approved and not accepted, and 13.8% were denied.

Refinancing loans were less likely than home purchase loans to be withdrawn/incomplete, at 29.1%; however, they were twice as likely to be denied, with a denial rate of 28.3%.

Home improvement loan applications had a much lower percent of applications withdrawn/incomplete, but a significantly higher percent denied. With a denial rate of 51.9%, a home improvement loan was more likely to be denied than any other action.



ii. Applicant Characteristics

Applications by Type of Loan

The most commonly sought type of financing was a conventional loan, a category that represented more than half of all loan applications. An additional 46.3 % of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. A smaller percentage of applications, 2.7%, were for loans backed by the Department of Veteran Affairs (VA). Two loan applications were backed by the Farm Services Administration or Rural Housing Service (FSA/RHS).

Applications by Type of Home

The majority of applications involved one-to-four family housing structures, with only nine applications (less than 1%) requesting financing for manufactured units. The denial rate for manufactured units, 50.0%, was substantially higher than the overall denial rate of 24.6% for all housing types; however, the low number of applications could skew this rate.

Applications by Race and Ethnicity

The racial and ethnic composition of loan applicants differs somewhat from the City's general demographic distribution. While 18% of all Waterbury households in 2011 were Black, only 13.8% of the loan applications for which racial/ethnic data was reported were Black. In addition, White households were overrepresented among mortgage applicants, with 82.5% of applications from White applicants compared to 63.3% of all households. Asian and Hispanic applicants represented 2.2% and 18.4% of applications, respectively. For the Asian population, this rate is higher than their 1.5% share of the population. For the Hispanic population, the number of applications is almost seven percent less than their 25.2% share of the City's population in 2011.

Lower participation in the market for home mortgages by Black and Hispanic households is likely a reflection of the lower median income of these minority groups.

Applications by Race/Ethnicity and Purpose of Loan

Across racial and ethnic groups, loan application types were generally similar, with refinancing as the most common loan type across all groups except Hispanics who had higher rates of home purchases. Hispanics and Blacks were the most likely groups to apply for a home purchase loan with 47.1% of all Hispanic and 44.5% of all Black applications going toward this loan purpose. Hispanics, Blacks and Other Race applicants also had the highest applications for home improvement loans.

Generally, minority populations with the exception of Asians had more applications for home purchase and home improvement loans while Whites had higher applications for refinancing. The breakdown of applications by type for the Asian population was generally comparable to that of the White population. Figure 6-2 summarizes these statistics.

Figure 6-2
 Loan Application Purpose by Race and Ethnicity, 2009-2011

	Total	White	Black	Asian**	Other**	No data	Hispanic*
Home purchase	3,389	2,136	424	55	38	736	598
	38.4%	37.5%	44.5%	36.7%	35.2%	38.1%	47.1%
Refinance	4,751	3,082	428	82	54	1,105	552
	53.8%	54.1%	45.0%	54.7%	50.0%	57.2%	43.5%
Home improvement	697	477	100	13	16	91	119
	7.9%	8.4%	10.5%	8.7%	14.8%	4.7%	9.4%
Total	8,837	5,695	952	150	108	1,932	1,269
	100.0%	64.4%	10.8%	1.7%	1.2%	21.9%	14.4%

Note: Percentages within racial/ethnic groups are calculated within each group's total.

* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.

Source: Federal Financial Institutions Examination Council, 2009 to 2011



Minority residents were severely underrepresented in loan applications compared to their share of the City's total population.

While 18% of all Waterbury households in 2011 were Black, only 13.8% of the loan applications for which racial/ethnic data was reported were Black. In addition, White households were overrepresented among mortgage applicants, with 82.5% of applications from White applicants compared to 63.3% of all households.

iii. Geographic Distribution of Approvals by Lender

Figure 6-3 provides a summary of the top ten lenders in the City based on total number of loan originations between 2009 and 2011. Webster Bank was the top lender in the City, with over 300 originations during the three-year period, accounting for 8.9% of all loans originated in the City. The next highest was Wells Fargo Bank with 286 (8.4%) of all originations. Those two banks had the largest share of originations in the City, with the next highest bank having 3% fewer originations than either bank. The third highest lender, Bank of America, had 182 originations (5.4%) of all loans originated.



Figure 6-3
Top 10 Lenders in Waterbury by Number of Originations, 2009-2011

Lending Institution	# of Loans Originated	% of Total Loans Originated
Webster Bank, NA	303	8.9%
Wells Fargo Bank, NA	286	8.4%
Bank of America, NA	182	5.4%
The McCue Mortgage Company	177	5.2%
PNC Bank, NA	142	4.2%
Naugatuck Savings Bank	136	4.0%
People's United Bank	96	2.8%
Mortgage Master, Inc.	93	2.7%
Quicken Loans	83	2.4%
Waterbury CT Teachers FCU	79	2.3%
Total Loans Originated	3,388	100.0%

Source: Federal Financial Institutions Examination Council, 2009 to 2011

The racially/ethnically concentrated areas of poverty, especially centered in downtown Waterbury, have fewer originations than all other areas. Three of the City's top lending institutions did not originate any loans in RCAP/ECAPs, and of the five census tracts with the fewest originations, four were the identified RCAP/ECAPs. In total, racially and ethnically concentrated areas of poverty comprised 1.53% of all originations in the City despite having 12.4% of the City's total housing units and 11.1% of the City's total population.

Map 6-1 illustrates the distribution of originations for the top ten lenders, with each dot representing 2 mortgage loan originations.



Between 2009 and 2011, 1.53% of all originations occurred in racially/ethnically concentrated areas of poverty.

RCAP/ECAP origination rates are low given those areas constitute 12.4% of the City's total housing units and 11.1% of its total population.

iv. Mortgage Application Denials

Reasons for Denial

Between 2009 and 2011, a total of 2,172 mortgage loan applications were denied in Waterbury. The overall cumulative denial rate was 24.6% with denials by race and ethnicity ranging from 24.9% for Whites to 29.6% for Blacks.

In reporting denials, lenders are required to list at least one primary reason for the denial and may list up to two secondary reasons. As Figure 6-4 demonstrates, the primary basis for the rejection of a majority of loan applications was insufficient collateral (22.8%) followed by 'no reason given.'



Denials and the Protected Classes

Among Blacks, an applicant's debt-to-income ratio was the most common reason for denial. For Asians, insufficient collateral was the most common reason. Finally, among Hispanics, 'no reason given' was the most common reason for denial, accounting for almost 30% of all denials.

Figure 6-4
Primary Reason for Mortgage Application Denial by Race, 2009-2011

	Total	White	Black	Asian	Other	Hispanic*	No Info
Collateral	22.8%	17.4%	20.8%	31.8%	20.7%	21.0%	21.9%
No Reason Given	22.2%	19.5%	18.8%	9.1%	18.6%	29.9%	22.9%
Credit History	20.5%	27.7%	14.6%	22.7%	26.3%	20.5%	21.3%
Debt-to-Income Ratio	17.6%	19.5%	31.3%	18.2%	17.3%	11.0%	17.0%
Other	6.8%	6.4%	0.0%	9.1%	5.9%	6.6%	6.6%
Incomplete Application	4.4%	5.7%	4.2%	2.3%	5.1%	6.6%	4.9%
Insufficient Cash	2.0%	2.1%	4.2%	2.3%	1.6%	1.3%	2.0%
Unverifiable Information	1.7%	1.4%	2.1%	2.3%	2.4%	2.4%	1.8%
Employment History	1.6%	0.0%	2.1%	2.3%	2.1%	0.8%	1.2%
Insurance Denied	0.4%	0.4%	2.1%	0.0%	0.0%	0.0%	0.4%

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2009 to 2011



Blacks and Hispanics had mortgage denial rates significantly higher than Whites.

For Hispanics, the most common reason for denial was 'no reason given,' accounting for almost 30% of all denials.

v. Mortgage Denials and Income

Classifying Income

For this analysis, lower-income households include those with incomes between 0% and 80% of median family income (MFI), while upper-income households include those with incomes above 80% MFI. Applications made by lower-income households accounted for 62.8% of all denials between 2009 and 2011, although they accounted for only 54.9% of total applications for those three years.

Denials by Income, Race and Ethnicity

Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 28.1%, the denial rates for lower-income Hispanic and Black households were 32.0% and 30.7%, respectively. Lower-income Asians had a denial rate of 40.2%. Lower-income Other Race applicants (consisting primarily of Native Americans) experienced a denial rate of 45.8%.



While denial rates were generally lower for upper-income households, differences persisted across racial and ethnic groups. The overall upper-income denial rate was 23.7%, compared to 17.8% for Asians, 22.9% for Whites, 27.3% for Hispanics and 30.8% for Blacks. Lower-income White households were less likely to experience denial than upper-income Black or Hispanic households. This pattern is consistent with discrimination. Figure 6-5 shows denials by income level among racial and ethnic groups.

Map 6-2 on the following page illustrates census tracts in Waterbury that experienced mortgage denial rates above 30.0%, which is higher than the City's overall denial rate of 24.6%. The highest denial rates occurred in the City's center and eastern half. All RCAP/ECAPs have higher denial rates than average and three of the four highest denial rates in the City are found in racially/ethnically concentrated areas of poverty.

Figure 6-5
Mortgage Application Denials by Household Race/Ethnicity, 2009-2011

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Applications	4,852	3,292	566	97	72	825	881
	Denials	1,365	894	174	39	33	225	282
	% Denied	28.1%	27.2%	30.7%	40.2%	45.8%	27.3%	32.0%
Upper-Income	Total Applications	2,957	2,029	308	45	28	547	289
	Denials	701	465	95	8	9	124	79
	% Denied	23.7%	22.9%	30.8%	17.8%	32.1%	22.7%	27.3%
Total	Total Applications	8,837	5,695	952	150	108	1,932	1,269
	Denials	2,172	1,417	282	48	44	381	376
	% Denied	24.6%	24.9%	29.6%	32.0%	40.7%	19.7%	29.6%

Note: Total also includes 2,155 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

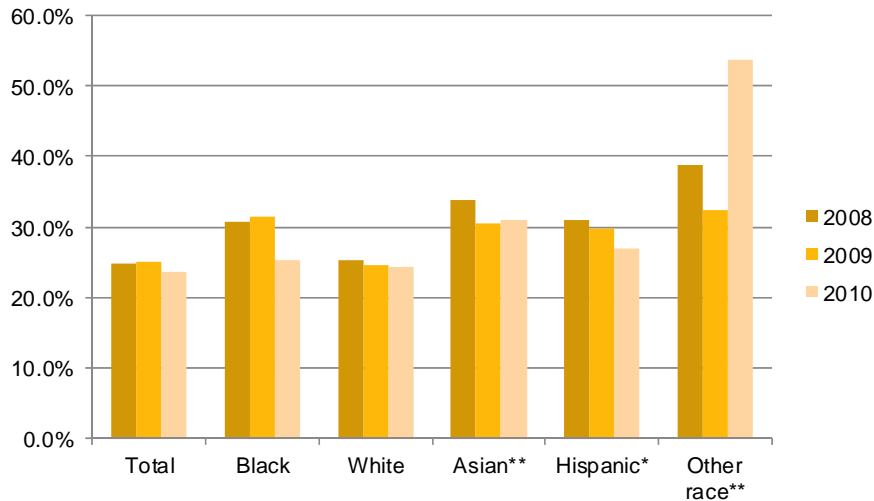
**Small sample size may make analysis unreliable.

Source: Federal Financial Institutions Examination Council, 2009 to 2011



Figure 6-6

Trends in Mortgage Application Denials by Household Race/Ethnicity, 2009-2011



Source: Federal Financial Institutions Examination Council, 2009 to 2011

* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.



Over the course of the three years studied, upper-income Black and Hispanic households were denied mortgage loans more often than lower-income White households.

Of lower-income White households, 27.2% of applications were denied compared to 27.3% of upper-income Hispanic and 30.8% of upper-income Black households.

vi. High-Cost Lending

Defining High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers by piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered



toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities
- A second-lien loan with an interest rate at least five percentage points higher than the standard

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

High-Cost Loans in Waterbury

Between 2009 and 2011, there were 3,388 home purchase, refinance or home improvement loans made for single-family or manufactured units in Waterbury. Of this total, 2,890 disclosed the borrower’s household income and 116 reported high-cost mortgages. Overall, upper-income households were less likely to have high-cost mortgages than lower-income households.

High-Cost Loans and Race/Ethnicity

An analysis of loans in Waterbury by race and ethnicity reveals that Black, Hispanic and Other Race households are overrepresented in high-cost lending. Among lower-income minority households, 5.5% of mortgages obtained by Blacks were high-cost, 4.3% of loans to Hispanics were high-cost and 9.1% of loans for Other Race persons were high-cost. In comparison, 3.0% of the mortgages obtained by lower-income White households and 0% of Asian household loans were high-cost.

Similar trends were apparent among upper-income households. Upper-income White households experienced a high-cost rate of 2.1% while upper-income Black households experienced a high-cost loan rate almost four times as high (9.0%). Similarly, upper-income Hispanic households had a relatively high percentage of high-cost mortgages, at 3.7%. Figure 6-7 summarizes high-cost lending trends in Waterbury.

Figure 6-8 shows the distribution of high-cost loans by racial/ethnic groups over individual years. The trends show general decreases in high-cost lending among racial/ethnic groups since 2009, but also shows notable increases in high-cost lending among White and Hispanic applicants in 2010.

Map 6-3 on the following page depicts the distribution of high-cost loans by census tract across the City and highlights census tracts with high-cost rates of 5% or higher. High-cost loans were generally concentrated in the center and eastern half of the City and in three RCAP/ECAP areas.

Annual Trends in High-Cost Loans

The number of high-cost originations decreased by more than two-thirds between 2009 and 2011 despite a slight increase between 2010 and 2011. The initial drop can likely be attributed to increasing statutory control over predatory lending practices. The slight rise, however, is inconsistent with national trends and should be reviewed again during the next AI process. Among racial groups, trends for White and Hispanic applicants mirror Citywide trends. Among Black, Asian and Other Race applicants, high-cost loans decreased each year. This information is shown in Figure 6-8.

Figure 6-7
High-Cost Loans by Race and Ethnicity, 2009-2011

		Total	White	Black	Asian**	Other**	No data	Hispanic*
Lower-Income	Total Originations	1,917	1,443	217	28	22	207	347
	High-Cost	66	44	12	0	2	8	15
	% High-Cost	3.4%	3.0%	5.5%	0.0%	9.1%	3.9%	4.3%
Upper-Income	Total Originations	1,229	936	122	21	10	140	107
	High-Cost	38	20	11	1	0	6	4
	% High-Cost	3.1%	2.1%	9.0%	4.8%	0.0%	4.3%	3.7%
Total	Total Originations	3,388	2,551	371	51	33	382	493
	High-Cost	116	71	26	1	2	16	20
	% High-Cost	3.4%	2.8%	7.0%	2.0%	6.1%	4.2%	4.1%

Note: Total also includes 498 loans for which no income data was reported.

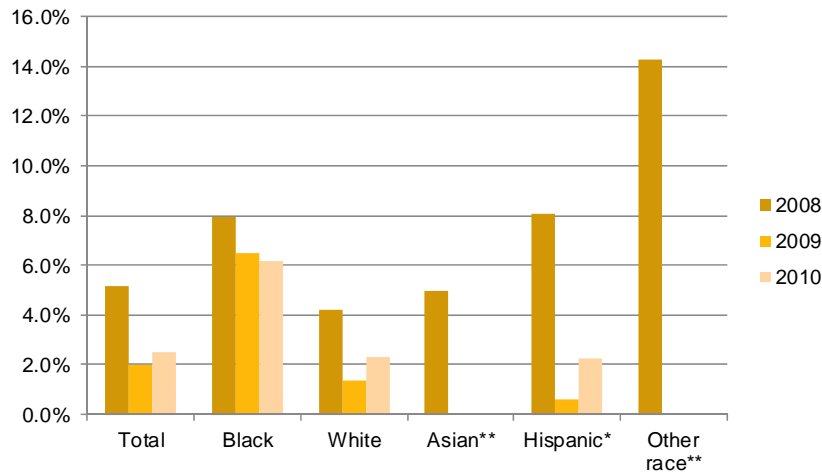
* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.

Source: Federal Financial Institutions Examination Council, 2009 to 2011



Figure 6-8
Trends in High-Cost Loans by Race and Ethnicity, 2009-2011



Source: Federal Financial Institutions Examination Council, 2009 to 2011

* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.



More than a quarter of all high-cost loan originations occurred in three racially and ethnically concentrated areas of poverty.

Black households, regardless of income level, are more likely than any other large racial or ethnic group to receive high-cost mortgages.

vii. Annual Trends in Mortgage Lending

Historic Lending Trends

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 6-9 illustrates this annual change.

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2009 as a result of buyer reluctance in an unstable market, and the number of applications in Waterbury follows this trend. The number of applications declined 26.7% between 2009 and 2010, and dropped 17.1% between 2010 and 2011. This is a total decrease of 1,480 applications or 39.2% over the three year period.

Change in Lending by Race and Ethnicity

Over this period, the percentage of total applications that resulted in loan originations increased each year. For individual racial and ethnic groups, this trend varied. Originations among White, Asian and Hispanic applicants climbed each

year, while originations among Black and Other Race applicants fell between 2009 and 2010 before increasing between 2010 and 2011.

Figure 6-9
High-Cost Home Purchase Loans by Race and Ethnicity, 2009-2011

	2009		2010		2011	
	#	%	#	%	#	%
Total loans						
Applied for	3,775	100.0%	2,767	100.0%	2,295	100.0%
Black	398	10.5%	325	11.7%	229	10.0%
White	2,382	63.1%	1,840	66.5%	1,473	64.2%
Asian	62	1.6%	46	1.7%	42	1.8%
Hispanic*	545	14.4%	406	14.7%	318	13.9%
Other race	49	1.3%	34	1.2%	26	1.1%
No information/NA	884	23.4%	523	18.9%	525	22.9%
Originated	1,383	36.6%	1,091	39.4%	914	39.8%
Black	151	37.9%	123	37.8%	97	42.4%
White	1,046	43.9%	819	44.5%	686	46.6%
Asian	20	32.3%	15	32.6%	16	38.1%
Hispanic*	199	36.5%	161	39.7%	133	41.8%
Other race	14	28.6%	9	26.5%	10	38.5%
No information/NA	152	17.2%	125	23.9%	105	20.0%
Originated - High Cost	71	5.1%	22	2.0%	23	2.5%
Black	12	7.9%	8	6.5%	6	6.2%
White	44	4.2%	11	1.3%	16	2.3%
Asian	1	5.0%	-	0.0%	-	0.0%
Hispanic*	16	8.0%	1	0.6%	3	2.3%
Other race	2	14.3%	-	0.0%	-	0.0%
No information/NA	12	7.9%	3	2.4%	-	0.0%
Denied	934	24.7%	694	25.1%	544	23.7%
Black	122	30.7%	102	31.4%	58	25.3%
White	605	25.4%	452	24.6%	360	24.4%
Asian	21	33.9%	14	30.4%	13	31.0%
Hispanic*	169	31.0%	121	29.8%	86	27.0%
Other race	19	38.8%	11	32.4%	14	53.8%
No information/NA	167	18.9%	115	22.0%	99	18.9%

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.

* Hispanic ethnicity is counted independently of race.

**Small sample size may make analysis unreliable.

Source: Federal Financial Institutions Examination Council, 2009-11

B. Real Estate Practices

Waterbury Board of Realtors

Information for this section of the AI was derived from an interview with a representative of the Board of Realtors.

Fair housing is a licensing component for realtors and is covered in a fair housing component during orientation. Once licensed, realtors are required to take 12 credits of



continuing education annually. Recently, the fair housing education component was folded into the law section of the continuing education program.

The Board of Realtors has an equal opportunity committee which handles fair housing complaints against realtors. There were two complaints regarding equal opportunity last year. To improve fair housing procedures, the Board also added a fair housing statement to all client agreements. By explaining fair housing practices to clients, realtors help set a standard of fairness as part of the process.

Recently, the Board of Realtors has held housing forums for Waterbury residents to learn about owning a home, to get information from lenders, and to learn about programs meant to keep those at risk of foreclosure in their homes. During these foreclosures, expositions have been held by different vendors and classes have been taught on a variety of subjects, including some taught in Spanish and Portuguese. The Board of Realtors would like to create a database of similar housing-related information available online to residents. If this is accomplished, the City should work with the Board to include fair housing information as a component of a future website or database.

C. Newspaper Advertising

Under federal law the making, printing, and publishing of advertisements that state a preference, limitation, or discrimination on the basis of race, color, religion, sex, handicap, familial status or national origin is prohibited. The prohibition applies to publishers, such as newspapers and directories. The prohibition also applies to persons and entities placing real estate advertisements.

Publishers and advertisers are responsible under federal law for making, printing, or publishing an advertisement that violates the Fair Housing Act on its face. Thus, they should not publish or cause to be published an advertisement that on its face expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory.

Republican American

For this AI, the Sunday February 3, 2013 print edition and the classified real estate sections posted on the newspaper's online edition between February 11 and February 21 were reviewed. There was no fair housing disclaimer or note that the ads are subject to the Federal Fair Housing Act posted on the newspaper's online edition. Under the Fair Housing Advertising guidelines, all advertisements are required to list the fair housing logo.



The Republic American does not include a fair housing disclaimer or the fair housing logo.

Advertisement Reviews

Of the advertisements reviewed for rental apartments, 44 stated "no pets" policies, one stated "small pets only", and one stated "no dogs". For some persons with disabilities, service animals and therapeutic pets are necessary to achieve independent lives.



Specifically, these statements prohibiting or limiting pets discourage persons with disabilities that require service or therapeutic animals from applying for, or even inquiring about, these units. Discussions with the newspaper should be initiated with the recommendation that its policy be modified to require all future rental real estate ads that state “no pets” (or seek to restrict the type of pet allowed) include the phrase: “except companion/service animals permitted under fair housing laws.”



Several rental real estate ads in the Republican American could be discriminatory for people with disabilities.

For people with disabilities who rely on service animals, rental ads limiting pets could discourage them from applying. To improve fair housing access, the newspaper should specify that service animals are permitted under fair housing laws.

In efforts to be more inclusive, seven advertisements listed “se habla español”. This provides a more inclusive environment for those with Spanish as a first language and English as a second language.

A number of advertisements listed “Section 8 is ok”. While this on its face may appear inclusive, it brings up underlying issues. According to Connecticut statutes, all landlords are required to accept Section 8 vouchers. Yet, advertisements in the Waterbury region which listed that Section 8 vouchers were accepted only included the City of Waterbury and Naugatuck Borough. None of the more affluent communities in the Waterbury region had advertisements which openly accepted Section 8 vouchers.

7. Current Fair Housing Profile

A. Fair Housing Policies and Actions since the Previous AI

2008 Analysis of Impediments to Fair Housing Choice

Waterbury's last Analysis of Impediments to Fair Housing Choice was completed in 2008 and included six actionable issues for the City to address. The City reports progress on these fair housing initiatives annually in its CAPER.

The actionable issues identified in 2008 were:

- Lack of locally designated fair housing officer
- No fair housing Affirmative Marketing Plan
- There is a potential that the burden or foreclosures resulting from the subprime mortgage crisis might fall disproportionately on minorities and people with disabilities
- The need for housing for special needs persons and disabled persons
- The lack of assistance to neighborhood groups wishing to become Neighborhood Revitalization Zone Organizations and/or lack of support for solving immediate neighborhood concerns
- The adverse impact of the subprime mortgage crisis on minorities and persons with disabilities

Progress Made since Previous AI

Since the last AI, the City has taken some steps to address these issues and affirmatively further fair housing choice. These include but are not limited to the following:

- Designating a Fair Housing Officer and increasing the staff person's role in fair housing issues by actively participating in the Fair Housing Association of Connecticut and attending monthly meetings and annual conferences, including:
 - Attending in February 2011 the Facing Foreclosure informational seminar at Waterbury City Hall sponsored by Fair Housing Center of Connecticut.
 - Attending in April 2011 the Fair Housing Association of Connecticut's "Meeting the Challenges of Fair Housing in 2011" in which topics included: fair housing mobility and integration, increasing the mobility of low-income residents as a way of desegregating Connecticut's communities and providing access to opportunity. Also discussed were reasonable accommodation, emerging issues and creative solutions.
 - Attending in July 2011 a HUD Hartford CPD grantee meeting on integration of affordable housing into communities of opportunity.
- Sponsoring fair housing training for the City, nonprofit and the legal community, including:
 - Conducting fair housing training in April 2011 for the Waterbury Department of Children and Families to provide workers a better understanding of fair housing laws, landlord-tenant issues, emergency relocation and local health codes.
 - Conducting fair housing training for the Waterbury Housing Authority and tenants in September 2011.
 - Conducted fair housing training during a Minority Small Business Workshop in September 2011.

- Maintaining a list of properties pursuant to Connecticut Public Act 09-144 in which the foreclosing entity must name a local property maintenance/management company. The Fair Housing Officer is in constant contact with the foreclosing entities to ensure the quality of life issues are addressed and units are kept safe, decent and sanitary.
- Funding the Neighborhood Housing Services of Waterbury (NHSW) to address foreclosures. NHSW provides foreclosure prevention counseling and intervention among their services to Waterbury residents. During the CAPER period, 60% or 320 residents received foreclosure prevention/intervention services. Workshops were held in both English and Spanish. In 2011, NHSW received assistance to provide increased support for existing homeowners in an effort to prevent future foreclosures and ensure the success of their homebuyer education services. They are building on their homeownership preservation activities with a post-purchase workshop series focused on providing the tools homeowners need to sustain and maintain their homes with an increased focus on creative programming and financial education.
- Funding Connecticut Legal Services (CLS) to address legal issues affecting Waterbury's low-income residents who are at risk of becoming homeless. With their Legal Services Support Project (LSSP), CLS helps them to access services and programs so that they can find stability and strengthen their financial security, and to preserve their current housing or receive additional time to relocate. The primary goal of the LSSP is to educate, empower and represent individuals and families who are at risk of becoming homeless.
- Proclaiming April 2011 as Fair Housing Month.
- Placing two fair housing billboards in English and Spanish on heavily traveled roads throughout the City to advertise Fair Housing Month.
- Maintaining a fair housing file with activities, promotions, and complaints.
- Utilizing Spanish translation services when needed.
- Maintaining a fair housing section to the WDC website with a link to a public service announcement.
- Meeting with the Housing Authority to discuss fair housing and asking them to direct any complaints or concerns to the Fair Housing Officer.
- Maintaining contact with various banks, bank regulators and federal agencies to assist homeowners during the foreclosure crisis.
- Partnering with Webster Bank and Waterbury Housing Fund in the lending process. WDC also partnered with Neighborhood Housing Services (NHS) of Waterbury to provide homeownership and foreclosure counseling. NHS also is providing a first time homebuyer training class for potential purchasers of properties in the NSP Program.
- Writing and updating the City's Affirmative Fair Housing Marketing Plan.
- Adding extensive late night and weekend bus service in the City, boosting opportunity for those without a vehicle to access jobs outside of the traditional daytime work hours.

HUD Letter of Findings

Following the completion of the 2008 AI and a review by HUD, the City's analysis was found to be deficient in a number of ways. While HUD found that the City did undertake certain actions to meet its fair housing obligations such as designating a fair housing officer and developing an affirmative marketing plan, HUD found that in other ways, the City did not accomplish its goals. The letter pointed to the use of NSP funds to renovate homes in

areas of high foreclosures and place new homeowners there. Additionally, many actions were reported in the City's CAPER over multiple years, without changes.

To successfully show progress relating to fair housing, HUD required the City to undertake this Analysis of Impediments including engaging area stakeholders and completing a thorough assessment of demographic and housing market trends.



8. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning in the City. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

A. Demographic and Housing Market Observations

- Waterbury's population has stayed relatively stable, increasing 2.2% between 1970 and 2010; however, central and western areas of the City have lost population. The City's rate of growth is slower than New Haven County and Connecticut as a whole. On a census tract level, several areas have experienced significant population gain while others have lost residents.
- As a share of total population, Hispanics increased from 21.8% of the City's population to 31.2%. While all minority groups increased their share of the total population in Waterbury, Whites fell from 67.1% to 58.8%. All other racial groups increased significantly.
- In the City of Waterbury, four census tracts have concentrations of minority persons. Three census tracts have concentrations of Hispanics and one census tract has a concentration of Blacks.
- Evidence shows that Waterbury is becoming more integrated as its population increases and diversifies. Between 2000 and 2010, White-Black segregation decreased 11.6 points and White-Hispanic segregation decreased 10.6 points based on the dissimilarity index.
- Hispanics and Other Race populations experienced poverty rates above 35% in 2011, while Whites had a poverty rate of 14.9%. All minority racial and ethnic categories had poverty rates above 20% in 2011.
- Other Race, Hispanic, Two or More Race, and Black populations were more likely than Whites and Asians to have annual incomes of less than \$25,000. In Waterbury, more than 40% of the Other Race, Hispanic, and Two or More Race populations earned less than \$25,000 in 2011.
- Four areas in Waterbury include concentrations of both LMI persons and minorities. Census tracts 3501, 3503, 3504 and 3505 are racially/ethnically concentrated areas of poverty.
- Of individuals with at least one disability, the rate of poverty decreased with age. While the percent of people with a disability increased with age, the percent of people with a disability living in poverty decreased. Those individuals under five years old had the highest rate of poverty at 78.6% while those age 75 and older had the lowest rate at 11.2%.
- Female-headed households with children accounted for more than two-thirds of all families living below the level of poverty in Waterbury. Female-headed households with children comprised 71% of all families living in poverty and were five and a half times as likely to live in poverty as married couple families with children.
- In Waterbury, 13,472 residents had limited English proficiency (LEP) in 2011. Just over 64% of persons with LEP were native Spanish speakers, representing 8.5% of the total population age five and older.

- With the exception of Asian residents, minorities were more likely to be unemployed than White residents in Waterbury. Unemployment among Blacks was 17.1% and 18.6% among persons of Some Other Race. Higher unemployment, whether temporary or permanent, will mean less disposable income for housing expenses.
- The housing inventory in Waterbury increased 2.5% between 2000 and 2010. While many tracts experienced increases, the tracts in the City's core lost housing units, including three RCAPs/ECAPs.
- Blacks had a homeownership rate 20 percentage points lower than Whites, despite having the highest homeownership rate of all minority groups. Blacks had a homeownership rate of 37.7% while Whites had a homeownership rate of 60.1%. Other Race residents and Hispanics had the lowest homeownership rates at 20.4% and 26.8%, respectively.
- Since 2000, housing costs in Waterbury have increased while median household income has decreased, making housing more expensive. Both median housing value and median rent increased more than 20% between 2000 and 2011, while median income fell 7.9%.
- Building permits for multi-family structures have decreased from a high of 79 units in 2006 to zero in 2011. This could lead to a tightening of the rental market in Waterbury.

B. Observations Relative to Fair Housing Profile

- Across Waterbury, disability was the primary basis for fair housing complaints to the Connecticut Commission on Human Rights and Opportunities between 2008 and 2012. More than a third of all cases involved disability, followed by source of income and ancestry.
- Minorities are overrepresented in both public housing and the Section 8 voucher program. While Black households represent 18% of all Waterbury households, 30% of public housing residents and 28% of Section 8 voucher holders are Black. Similarly, Hispanics represent 25.2% of City households, but account for 56% of public housing residents and 54% of Section 8 voucher holders.
- Minority residents were severely underrepresented in loan applications compared to their share of the City's total population. While 18% of all Waterbury households in 2011 were Black, only 13.8% of the loan applications for which racial/ethnic data was reported were Black. In addition, White households were overrepresented among mortgage applicants, with 82.5% of applications from White applicants compared to 63.3% of all households.

9. Impediments to Fair Housing Choice

A. Public Sector — City of Waterbury

i. **Some of the policy documents used by the City of Waterbury could be improved from a fair housing perspective.**

Currently, the HOME project selection criteria do not consider the ability of projects to further desegregate the City and deconcentrate poverty. Waterbury's certification to affirmatively further fair housing requires the City to engage in proactive efforts to expand housing opportunities beyond impacted areas (i.e., RCAPs/ECAPs). Adding this criterion to the project selection process would be a relatively simple and effective way to do so.

Waterbury's recent zoning code update place unnecessary restrictions on group homes and family size, and limit certain affordable housing options. The City should update these sections to meet fair housing requirements.

Proposed Action: The City should incorporate the Site and Neighborhood Standards at 24 CFR 941.202 into its HOME Program guidelines and, to the maximum extent feasible, prioritize the use of HOME funds to expand the number of units of affordable rental housing for families in non-impacted areas of the City. In its evaluation of proposed HOME projects, the City should give priority preference to proposals that would provide affordable housing opportunities in non-impacted areas (i.e., outside of RCAPs/ECAPs).

Proposed Action: The City should amend the definition of family in its zoning ordinance to be more inclusive of non-traditional family units.

ii. **Additional education and outreach is needed 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.

- Proposed Action:** The City should update its website to include a fair housing page with basic info and links to HUD, CHRO, and special focus on the City's HRC.
- Proposed Action:** 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.
- Proposed Action:** 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 in-house.
- Proposed Action:** 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.
- Proposed Action:** The City should require fair housing training as part of the CDBG, HOME and ESG application process. Local non-profits are important distributors of information throughout the community and educating them to disperse fair housing information and conduct their programs in non-discriminatory ways is an important component of building a comprehensive fair housing network.
- Proposed Action:** 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.



Proposed Action: 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.

iii. 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.

Proposed Action: 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.

iv. 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.

Proposed Action: 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 intra-municipal mobility options to members of the protected classes and other lower-income residents of the community.

Proposed Action: 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.

v. 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.

Proposed Action: 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.

vi. 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.

While the City employs bi-lingual staff and has a limited policy concerning translation services, the City’s substantial and growing LEP population likely calls for further accommodation under Title VI of the Civil Rights Act of 1964.

Proposed Action: WDC 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 LEP.

vii. The City of Waterbury does not have a complete fair housing profile because of a lack of local testing.

While information in this document gives the City a baseline for furthering fair housing, there remains a need for testing for discrimination in the City. Testing is an important component of a fair housing profile and should be undertaken for a



variety of protected classes including minorities, the disabled and those with limited English proficiency.

Proposed Action: The City should financially support the efforts of qualified fair housing advocacy organizations to conduct random paired testing of the applicant screening and selection process. This should be undertaken in the rental market for race, disability, national origin and source of income.

B. Public Sector — Housing Authority of the City of Waterbury

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

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.

In public housing stock, HACW is working to complete its Section 504 Voluntary Compliance Agreement. When finished, the Authority will be in compliance with federal requirements related to the provision of accessible units in its public housing stock.

Proposed Action: HACW must fulfill the requirements of its Voluntary Compliance Agreement. This includes completing the Housing Authority’s Transition Plan to retrofit its housing stock and make it accessible to persons with disabilities.

Proposed Action: HACW should complete the proposed renovations of the Truman and Dewberry housing projects. These communities should include required accessibility features.

ii. Some of the policy documents used by the Housing Authority of the City of Waterbury could be improved from a fair housing perspective.

To achieve compliance with Connecticut law and recent HUD program regulations, HACW should update its ACOP and Section 8 Admin Plan to add gender identity and sexual orientation as protected classes. Public housing authorities, like all HUD funding recipients, may no longer discriminate on these grounds.

The Housing Authority’s Section 8 Admin Plan also does not allow applicants to refuse a unit offer unless they can prove a medical reason for refusal, limiting the choice of those seeking public housing.



Additionally, Housing Authority policies such as income targeting may be contributing to disproportionate representation of Black and Hispanic households on the public housing wait list. This should be studied to determine whether such policies are having the unintended effect of housing discrimination.

Proposed Action: HACW should update its ACOP and Section 8 Admin Plan to comply with new HUD program regulations and Connecticut laws, and include sexual orientation and gender identity as protected classes.

Proposed Action: HACW should allow public housing applicants to refuse at least two units of public housing without being penalized. This allows greater housing choice for public housing applicants without unnecessarily burdening the Housing Authority.

Proposed Action: HACW should evaluate whether its policies are contributing to a higher percent of minority households on the public housing wait list than in public housing itself. Significantly higher numbers of minorities on the wait list may signify that certain policies, such as income targeting, are adversely affecting minority applicants.

iii. Persons with limited English proficiency are experiencing difficulty accessing housing.

Two language groups in Waterbury exceed safe harbor minimums. With an increasing numbers of persons with LEP, the Housing Authority should complete a robust Language Access Plan to ensure these groups have access to public housing.

Proposed Action: HACW should complete the Language Access Plan that is presently underway.

iv. The Housing Authority may be unnecessarily funding Section 8 vouchers at 120% of the area Fair Market Rent.

HACW offers vouchers at 120% of FMR throughout Waterbury. While this may improve the ability of voucher holders to secure housing in certain sections of the City, it may also mean the Authority is overpaying in other areas.

Proposed Action: HACW should conduct a rent reasonableness test to determine the appropriate payment standard in different



City neighborhoods. By providing a range of percentages based on the housing market in each neighborhood, the Authority may be able to increase the number of vouchers available and help to target certain higher-opportunity neighborhoods with higher payment standards.

v. Housing Choice Voucher holders are experiencing 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. 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.

Proposed Action: 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, specifically, on landlords with accessible units.

Proposed Action: HACW should collaborate with the City to conduct paired testing in the rental market for bias against source of income protection.

C. Private Sector

i. 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.

Over the course of the three years studied, upper-income Black and Hispanic households experienced denial rates that were higher than those of lower-income White households. This pattern is consistent with discrimination. Additionally, rejections for Hispanic applicants were less likely to be accompanied by a reason for denial.

Lower-income Black, Hispanic and Other Race households are more likely to receive high-cost mortgage loans than lower-income White or Asian households. In addition, upper-income Black, Asian and Hispanic households are more likely to receive high-cost mortgage loans than upper-income White households. This trend places minority homeowners at greater risk for eviction, foreclosure, and bankruptcy.

Proposed Action: 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.

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

The real estate section in the Republican American included advertisements prohibiting or restricting pets. For some persons with disabilities, service animals and therapeutic pets are necessary to achieve independent lives. Statements prohibiting or limiting pets discourage persons with disabilities that require service or therapeutic animals from applying for, or even inquiring about, these units.

Additionally, online sections of the Republican American did not include fair housing disclaimers or logos. This information is important to informing renters and buyers of their rights to equal treatment.

Proposed Action: 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.

Proposed Action: 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."

10. Fair Housing Action Plan

Actions	Responsible Entities	Benchmark	Year to be Completed	Potential Cost	Date Completed
Public Sector—City of Waterbury					
Impediment 1: Some of the policy documents used by the City of Waterbury could be improved from a fair housing perspective.					
Action: The City should incorporate the Site and Neighborhood Standards into its HOME Program guidelines and prioritize the use of HOME funds in non-impacted areas of the City.	City of Waterbury, WDC	Incorporation of standards into scoring criteria	2014	\$0 (staff time)	
Action: The City should amend the definition of family in its zoning ordinance to be more inclusive of non-traditional family units.	City of Waterbury, WDC	Changes to the zoning code	2015	\$0 (staff time)	
Impediment 2: Additional education and outreach is needed regarding rights and responsibilities under the Fair Housing Act, and state and local laws.					
Action: The City should update its website to include a fair housing page with basic info and links to HUD, CHRO, and special focus on the City's HRC.	City of Waterbury, WDC, HRC	Updated City website	2013	\$0 (IT staff time)	
Action: The City should assist in updating and improving the HRC's webpage.	City of Waterbury, WDC, HRC	Updated HRC website	2013	\$1,000	
Action: The City should provide training opportunities to HRC members.	City of Waterbury, WDC, HRC	HRC attendance at training	2014	\$1,500	
Action: The City should create a small-scale marketing campaign to educate the public about fair housing in general and the HRC in particular.	City of Waterbury, WDC, HRC	Marketing brochures or other outreach completed	2014	\$2,000	
Action: The City should require fair housing training as part of the CDBG, HOME and ESG application process.	City of Waterbury, WDC	Training required of applicants	Ongoing	\$0 (staff time)	
Action: The City should collaborate with the Board of Realtors to include fair housing information in the proposed housing information database, should it be completed.	City of Waterbury, WDC, Board of Realtors	Meetings with the Board of Realtors	2013	\$0 (staff time)	



Actions	Responsible Entities	Benchmark	Year to be Completed	Potential Cost	Date Completed
Action: The City should continue offering fair housing training to boards, commissions, and resident groups.	City of Waterbury, WDC, Various Groups	Trainings held	Ongoing	\$1,000	
Impediment 3: Landlords may not be receiving adequate fair housing information.					
Action: The City should provide fair housing training to local landlords.	City of Waterbury, WDC, Property Owners Alliance	Trainings for local landlords held	Ongoing	\$1,000	
Impediment 4: The City of Waterbury has limited options in terms of expanding the supply of affordable housing for families in non-impacted neighborhoods of opportunity.					
Action: The City should collaborate with surrounding municipalities to develop strategies that expand fair housing choice for all residents of the region.	City of Waterbury, WDC, Surrounding Municipalities	Inviting surrounding municipalities to join fair housing task force	2016	TBD	
Action: The City should continue to improve transit connections outside Waterbury, when possible.	City of Waterbury, WDC, CT Transit	Meetings, grant proposals, etc	Ongoing	TBD	
Impediment 5: Poor property maintenance and abandonment in Waterbury limit the availability of decent and safe units within the City's affordable housing stock.					
Action: The City should undertake a rental housing inspection program.	City of Waterbury, WDC	Rental housing inspection program begun	2018	TBD	
Impediment 6: 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.					
Action: WDC 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 LEP.	City of Waterbury, WDC	Four-factor analysis completed	2014	\$0 (staff time)	



Actions	Responsible Entities	Benchmark	Year to be Completed	Potential Cost	Date Completed
Impediment 7: The City of Waterbury does not have a complete fair housing profile because of a lack of local testing.					
Action: The City should financially support the efforts of qualified fair housing advocacy organizations to conduct random paired testing.	City of Waterbury, WDC, Fair Housing Partners	Completed testing, results of report	2016	TBD	
Public Sector—Housing Authority of the City of Waterbury					
Impediment 8: The age and condition of housing stock in Waterbury limits the housing opportunities available to persons with disabilities.					
Action: HACW must fulfill the requirements of its Voluntary Compliance Agreement.	HACW	Completion of VCA requirements	2017-2019	\$2,000,000	
Action: HACW should complete the proposed renovations of the Truman and Dewberry housing projects.	HACW	Completion of new housing projects	TBD	TBD	
Impediment 9: Some of the policy documents used by the Housing Authority of the City of Waterbury could be improved from a fair housing perspective.					
Action: HACW should update its ACOP and Section 8 Admin Plan to comply with new HUD program regulations and Connecticut laws, and include sexual orientation and gender identity as protected classes.	HACW	Updated ACOP and Admin Plan	2013	\$0 (staff time)	
Action: HACW should allow public housing applicants to refuse at least two units of public housing without being penalized.	HACW	Updated policies	2013	\$0 (staff time)	
Action: HACW should evaluate whether its policies are contributing to a higher percent of minority households on the public housing wait list than in public housing itself.	HACW	Written determination of policy analysis	2013-2014	TBD	
Impediment 10: Persons with limited English proficiency are experiencing difficulty accessing housing.					
Action: HACW should complete the Language Access Plan that is presently underway.	HACW	Completed LAP	2013	N/A (Funds Already Committed)	
Impediment 11: The Housing Authority may be unnecessarily funding Section 8 vouchers at 120% of the area Fair Market Rent.					
Action: HACW should conduct a rent reasonableness test to determine the appropriate payment standard in different City neighborhoods.	HACW	Completed rent reasonable test and neighborhood-based payment standards	2013-2014	TBD	



Actions	Responsible Entities	Benchmark	Year to be Completed	Potential Cost	Date Completed
Impediment 12: Housing Choice Voucher holders are experiencing difficulty in securing private rental housing.					
Action: 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.	HACW, Property Owners Alliance	Number of new landlords recruited	Ongoing	\$0 (staff time)	
Action: HACW should collaborate with the City to conduct paired testing in the rental market for bias against source of income protection.	City of Waterbury, HACW, Fair Housing Partners	Completed testing, results of report	2016	TBD	
Private Sector					
Impediment 13: 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.					
Action: The City should evaluate the extent to which housing counseling is available to provide credit counseling to members of the protected classes.	City of Waterbury, WDC	Completed evaluation	2014	\$0 (staff time)	
Impediment 14: Local for-sale and rental housing advertisements include language that may discourage certain members of the protected classes from applying.					
Action: 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.	City of Waterbury, WDC	Letter sent to Republican American	2013	\$0 (staff time)	
Action: 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.	City of Waterbury, WDC	Letter sent to Republican American	2013	\$0 (staff time)	

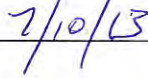


11. Signature Page for the City of Waterbury

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

