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# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

City of Meriden | Community Development



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#### I. EXECUTIVE SUMMARY

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) from local jurisdictions receiving federal housing and community development funds including Community Development Block Grant (CDBG) funding.

The overall goal of the AI is to review and assess impediments to fair housing within Meriden.

According to HUD, 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 choice or the availability of housing choices.
- 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.

The AI consists of seven components including:

- 1. Executive Summary;
- 2. Introduction;
- 3. Jurisdictional Background Data;
- 4. Evaluation of the Jurisdiction's Current Fair Housing Legal Status;
- 5. Identification of Impediments to Fair Housing Choice;
- 6. Assessment of the Current Public and Private Fair Housing Programs and Activities in the Jurisdiction; and
- 7. Conclusions and Recommendations.

## **Planning Preparation and Process**

The AI was developed in conjunction with the 2010-2015 Consolidated Plan and required extensive outreach, consultation, and coordination among various government agencies, private groups, public service agencies, City staff, and individuals. A comprehensive list of participants can be found in Appendix D.

## Citizen Participation

The City of Meriden understands the importance of citizen participation in the development of the Al and conducted extensive public outreach during the Al process including consultation with local public service agencies and commissions and with State organizations. A Fair Housing Survey was conducted and available for public and private organizations that provide services essential to fair housing and to the public to gather input relevant to fair housing efforts and impediments to fair housing in Meriden. A fair housing section was also part of the 2010-2015 Consolidated Plan survey to gather additional information.

Community Development staff also met with the Human Rights Advisory Board to summarize key components of the AI, present preliminary findings of the survey, and solicit input from the Board. The public is welcome to attend the meetings and provide comments. The City of Meriden made the draft plan available for public comment for 30 days and also held a public hearing on April 21, 2010 to solicit public input.

## Fair Housing Initiatives

Fair housing initiatives are critical to ensuring equal housing opportunity within a community. A key element to achieving this goal is by updating the previous Analysis of Impediments to Fair Housing Choice. The previous AI was first conducted in July 1996 and updated as part of the 2000 and 2005 Consolidated Plan process.

The City of Meriden has continued to implement various housing and public service programs to assist with furthering fair housing efforts. In addition, State agencies provide an array of fair housing services including fair housing training and educational outreach.

#### **Federal Resources**

The primary federal resource for the City is the Community Development Block Grant (CDBG) program through the U.S. Department of Housing and Urban Development (HUD). The total estimated funding for the City of Meriden for fiscal year 2010-11 is \$1,005,552 of CDBG funds.

#### II. INTRODUCTION

Title VIII of the Civil Rights Act of 1968 (and subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race;
- Color;
- · Religion;
- · National origin;
- Sex;
- · Families with children; and
- Persons with handicaps.

The U.S. Department of Housing and Urban Development (HUD) requires that all recipients of federal funds under the Community Development Block (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Meriden receives CDBG funding annually and therefore is required to update its Analysis of Impediments to Fair Housing Choice (AI).

The City's previous AI was first conducted in 1996 and updated in 2000 and 2005 by the City of Meriden. The purpose of this study is to update the AI in accordance with HUD regulations under 24 CFR 570.904(c)(1) for Entitlement CDBG grantees of the U.S. Department of Housing and Urban Development. The City is committed to furthering fair housing within Meriden.

## Who Conducted the Study

The City's Community Development Department is responsible for the administration and implementation of the CDBG program and is the lead agency for the update of the Analysis of Impediments to Fair Housing Choice. The Community Development Office coordinated efforts with numerous other public service agencies and conducted extensive public outreach in preparing the Al.

## **Participants**

To ensure compliance with citizen participation requirements and that all relevant information was gathered, the City utilized various resources in conducting the AI and collaborated with individuals and groups that represent the special interests of protected groups. A fair housing survey was provided online and a draft of the AI was available to various fair housing organizations and low-and moderate-income persons and families for comment. Participants included:

- · City of Meriden Housing Authority;
- City of Meriden Planning Division;
- City of Meriden Community Development Division;
- · City of Meriden Law Department;
- Connecticut Fair Housing Center;
- · Connecticut Office of Protection and Advocacy for Persons with Disabilities;
- Connecticut Commission on Human Rights & Opportunities;
- City of Meriden Human Rights Advisory Board;
- New Opportunities, Inc.;
- · Meriden Wallingford Chrysalis; and
- Neighborworks New Horizons.

Additionally, during the preparation of the 2010-2015 Consolidated Plan, public hearings were held March 4, 2010 and April 21, 2010 to solicit public input. As part of the Consolidated Plan Survey, participants provided fair housing information to be incorporated into the Al. Meetings were available to the public, various public service agencies, and non-profit organizations taking a special interest in housing-related activities. A draft of the Al was available at the Community Development Office and on the City's website for 30 days to provide the opportunity for public comment. A comprehensive outreach list can be found in Appendix D.

## Methodology

The preparation of the AI included identifying strengths and weaknesses in fair housing practices and recommending courses of action to improve upon deficiencies found during the study. The analysis

included a review of jurisdictional background data including demographics, income, employment, and a housing profile. To properly update the AI it was also necessary to perform a comprehensive review of local laws, regulations, ordinances, and policies related to housing or affecting housing patterns and practices in Meriden. The AI was prepared in accordance with HUD's <u>Fair Housing Planning Guide, Vol. I.</u> Below demonstrates the approach taken during the AI process and the components reviewed.

#### Demographics and Trends

Utilizing resources such as the U.S. Census Bureau, HUD, and local studies demographic and housing data was collected for the City of Meriden to determine any patterns or trends that may indicate a concentration of protected classes in any one area of the City. Data collected and analyzed also included employment, income, and other relevant data.

Information on the availability of housing, including various housing types and sizes, affordability levels, and accessibility for disabled persons was also reviewed.

#### Data Collection

Data collection included an analysis of fair housing choice and any limitations due to existing conditions within the City or surrounding localities. A comprehensive review and assessment of current land use policies, local laws, ordinances, and practices that may affect fair housing choice within the City of Meriden was conducted. The review included an assessment of local codes that may influence the availability or accessibility of housing to protected groups including minorities, families with children, or people with disabilities. Policies, processes, procedures, or local decisions that may be a barrier to fair housing and impede the approval of construction assisting in the creation of subsidized and private housing was also reviewed.

Data collection also included an evaluation of local public policy and if it keeps housing and community development resources from areas with a large concentration of minorities or people with disabilities. Administrative policies were also reviewed.

Information related to the public and private sector was analyzed including zoning and site selection, neighborhood revitalization, municipal and other services, public and assisted housing tenant selection procedures, sale of subsidized housing, property tax policies, planning and zoning boards and building codes.

Data regarding fair housing enforcement, informational programs, and visitability in housing was collected and lending policies and practices was analyzed using the Home Mortgage Disclosure Act (HMDA) and Private Mortgage Insurance Companies (PMIC).

#### Maps

Maps were utilized to identify housing, job, and transportation relationships, areas of racial/ethnic integration and segregation, and locations of choices for publicly assisted housing.

Maps also provide information regarding where within the City housing for families with children and persons with disabilities is in short supply, as well as locations of multifamily complexes providing housing for families with children and the disabled.

#### Investigations and Enforcement Status and Performance

An evaluation and assessment of fair housing status and performance was conducted. HUD was utilized as a resource to analyze any complaints or compliance reviews where the Secretary has issued a charge or made a finding of discrimination and verification with the Department of Justice regarding any suits filed was also made.

#### Assessment of Housing Programs and Activities

The City of Meriden's current programs and activities and accomplishments already made to further fair housing were reviewed and included in the Analysis of Impediments.

#### Conclusions/Recommendations

Impediments identified and recommendations for addressing each impediment are included in the AI to assist the City in eliminating barriers to fair housing choice.

## **Funding**

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), the City of Meriden is required to conduct an Analysis of Impediments to Fair Housing Choice. The City supports fair housing and encourages citizen participation in identifying impediments to fair housing within the community. The AI was conducted by the City of Meriden utilizing its 2009 Community Development Block Grant (CDBG) funds. Information included in the AI will allow the City to continue efforts to improve fair housing throughout the community.

Funding is imperative to implementing activities and projects focused on continuing fair housing efforts. The City of Meriden expects to receive approximately \$1,005,552 in CDBG funding for the 2010-11 fiscal year. Other key agencies involved in promoting fair housing include the Meriden Housing Authority and the Connecticut Fair Housing Center. The Housing Authority receives both federal funding through HUD and also State funding through the Connecticut Housing Finance Authority (CHFA) and the Department of Economic and Community Development (DECD). The Connecticut Fair Housing Center operates as a state-wide non-profit.

#### Conclusions

The City gathered all pertinent data for the preparation of the AI including collecting demographic data, performing a comprehensive review of public sector laws, regulations, ordinances, and policies, and reviewing private sector lending policies and practices, fair housing enforcement, informational

programs, and visitability in Meriden. The Analysis also included an assessment of local fair housing programs and activities. The City consulted with various fair housing organizations and also conducted a fair housing survey which provided valuable input for the preparation of the plan. Review and assessment of the data presented in this analysis along with input received for various organizations and the public identified the following impediments to fair housing in Meriden:

- High income levels and fees required to rent apartments limits choices for persons with fixed incomes;
- Limited financial assistance for the elderly/low-income/disabled;
- Predatory lending practices;
- · Lack of accessible housing for the disabled;
- · Lack of affordable owner-occupied housing;
- Inadequate supply of Section 8 housing units;
- Discriminatory or unethical practices by landlords;
- Lack of available vacant land in Meriden to build affordable housing;
- Lack of education regarding fair housing laws;
- Poor financial history of potential homebuyers;
- The City's zoning ordinance does not recognize accessory apartments in single-family zones.

There are various approaches and actions the City can take in an effort to remedy fair housing impediments. Recommendations for resolutions to impediments and the continuation of fair housing efforts are detailed in Section VII of this Analysis of Impediments to Fair Housing Choice. The City may implement specific recommendations to address fair housing needs and selected actions will be determined by the amount of funding available to address impediments, priority community needs, and actions that are in the best interest of Meriden residents.

## III. JURISDICTIONAL BACKGROUND

Framed by mountain ridges, the City of Meriden is located in New Haven County and is situated between the Cities of Hartford and New Haven Connecticut. Native Americans hunted and fished the lands of Meriden for thousands of years until it became a suburban sector of the Town of Wallingford, a resting place for traveling colonist. By 1727, difficulty attending religious services from the scattered farms of the 35 families residing in Wallingford resulted in a meeting house closer to their homes being constructed. The parish was known by the name Meriden. In 1806, the parish was recognized as the Town of Meriden and the City was incorporated in 1867. The 1800's brought a flood of manufacturing of silver products in the City dubbing Meriden the "Silver City" and the City continues to change, improve, and grow today.

#### **Demographic Data**

#### **Population**

As of 2006 the City's population was recorded at approximately 60,000, a 0.6% increase from 2005 which is consistent with the County and surrounding communities. The census tracts experiencing the greatest increase in population from 1990-2000 were located in the southern portion of the downtown, the east side and northern end of the City, and the northwest corner of the City.

#### Age

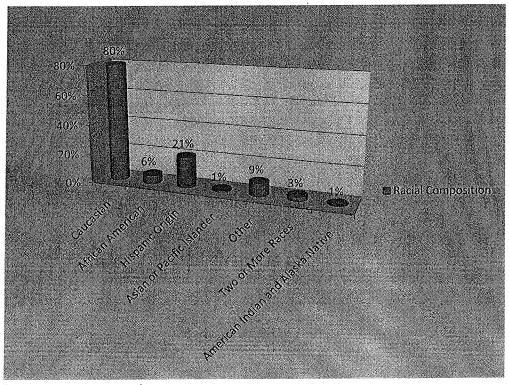
The median age of Meriden residents in 2000 was 36 years, generally consistent with the County and State as a whole.

- 43.7% of the population is between the 24 to 54 age range.
- 26.7% is residents under the age of 18.
- 15% is seniors, or residents 65 years or older.

## Race/Ethnicity

Though the City of Meriden has a diverse population it is mainly comprised of White/Caucasian residents representing 80% of the population in 2000. Figure 1 below demonstrates the racial composition of Meriden in 2000. Recognizing the racial and ethnic composition of a community can help to address impediments to fair housing such as language barriers and allow a community to properly address housing discrimination based on race.

Figure 1
Racial Composition



<sup>\*</sup>Hispanic origin can consist of any race.

#### Income Data

Being aware of the income profile for the City of Meriden is an important factor that can help identify the needs of low-and moderate-income persons and reveal income trends leading to poverty in specific target areas throughout the community. Income is directly related to increasing housing opportunity.

- Median household income in 1999 was \$43,237.
- ACS estimates a median household income increase as of 2008 at \$56,876.
- Median family income in 1999 was \$52,788.
- Median family income in 2008 was \$68,179.
- New Haven County's median household income in 1999 was \$48,834.

<sup>\*</sup>Race can be claimed under multiple categories so total count will not equal 100%

<sup>\*</sup>Source: City of Meriden 2009 Plan of Conservation and Development

According to the 2000 census 6,306 persons or 11% of Meriden's residents were living below the poverty level, a higher percentage than that of New Haven County at 9% and as the state as a whole at 8%. Female-headed households with children under 18 living below poverty accounted for 1.4% of the population. Families with children under 18 made up less than 1% of the population and less than 1% of persons in poverty were 65 years or older.

HUD uses the area median family income (AMI) to determine eligibility for HUD programs such as the Community Development Block Grant (CDBG) program, the HOME Investment Partnership (HOME) program, and the Emergency Shelter Grant (ESG) program. The AMI distinguishes families and individuals that are extremely low income, low income, and moderate income, meaning that their income is at or below 80% of the AMI. The AMI establishes areas within the City that have a high percentage of low-to moderate-income persons. Areas identified as having at least 51% low-to moderate-income persons are recognized as target areas. Figure 2 below shows HUD's income levels for the CDBG, HOME, and ESG programs.

Figure 2
HUD Income Levels

Income Level	%AMI	Income
Extremely Low	0-30%	Less than \$23,500
Low	31-50%	\$23,501-\$39,150
Moderate	51-80%	\$39,151-\$61,500

Source: HUD 2008 Income Limits

#### **Economic Data**

## **Employment**

The City of Meriden has several large businesses employing hundreds of people but the City's economy seems to thrive from small business operations. In 2005, Meriden contained over 1,300 businesses providing a variety of goods and services. These businesses employed over 25,000 people. Census data reveals that in 2004 68% of businesses in Meriden have less than 10 employees. As of 2005 there were 25,067 person employed within the City of Meriden. The labor force generated by Meriden was 30,768 people. Meriden's resident labor force exceeded the number of jobs located in the City by 22.7%.

In 2005, the service industry attested for the largest sector of employment with 11,808 persons being employed in that field followed by retail at 3,720. The manufacturing, government, and finance, insurance, and real estate industries round out the top five employment sectors in Meriden (refer to Figure 3).

<sup>\*</sup>The income limits in this table are based off the median family income for a family of four.

<sup>\*</sup>Persons entering permanent housing through HUD's ESG program must be "very low income".

Figure 3
Top Five Employment Sectors

Industry	Employed
Service/other:	11,808
Retail Trade	3,720
Manufacturing	3,500
	2,917
Finance/Insurance/Real Estate	1,232

Source: U.S. Census Bureau/City of Meriden 2009 Plan of Conservation and Development Update

## **Housing Profile**

The type, size, composition, condition, and cost of Meriden's households must be taken into consideration in developing housing goals. Knowledge of housing patterns within the City allows for a comprehensive strategy for addressing fair housing needs. Housing information collected enables the City to evaluate the type and condition of the City's current housing stock and the number and type of families or individuals in need of housing assistance. Data gathered will assist in identifying proper housing services that should be provided to sustain affordable housing and to address housing needs for all income levels and categories of persons affected.

#### Household Tenure

Meriden's housing tenure is based off the total occupied housing units of 22,951.

- 60% of Meriden's housing units are owner-occupied.
- 40% are renter-occupied.

Meriden's percentage of rental units is slightly higher than that of New Haven County and significantly higher than most other surrounding communities. Meriden's housing stock is similar to a moderate-sized urban community and the high percent of rental units may provide an explanation for higher vacancy rates than surrounding communities.

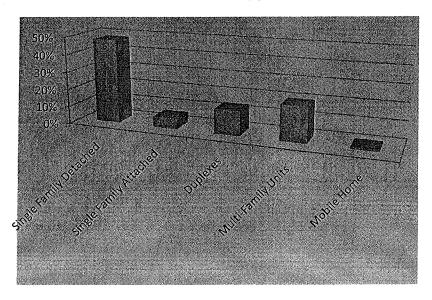
## Household Type

The type of housing structures in the City of Meriden vary with single-family detached housing being the majority of Meriden's housing stock followed by multi-family units and duplexes (refer to Figure 4).

• 48% - Single-family detached.

- 6% Single-family attached.
- 14% Duplexes.
- 20% Multi-family units.
- 1% Mobile Home.

Figure 4 Household Type



\*Source: City of Meriden 2009 Plan of Conservation and Development

## Large Households

A large household is considered to have five or more people residing in the unit. Statistics regarding large households can assist with determining types of housing needed in the City of Meriden and can reveal overcrowding trends that may increase concentrations in target areas.

- 10%, of the total number of occupied housing units in Meriden contain five or more persons.
- 60% of large households own their homes and 40% rent.
- Of the total housing units in Meriden, 55% of owner-occupied units have three or more bedrooms.
- Of the total housing units in Meriden, 34% of renter-occupied units have three or more bedrooms.

#### Single Parent Households

Single parent households refer to family households where either a male householder has no wife present or a female householder has no husband present.

- 11% of Meriden's occupied households are single parent households with their own children under the age of 18.
- 82% of single parent households are female-headed households.
- 38% of female-headed households with their own children under 18 live at or below the poverty level.

#### Housing Vacancy

According to 2000 census data the City of Meriden had a total of 24,631 housing units, of which 22,951 are occupied. The City's vacancy rate is approximately 7% or 1,724 vacant housing units.

The City of Meriden's vacancy rate is higher compared to New Haven County, Hartford County, and State rates of 6%, 5%, and 6% respectively. Meriden's vacancy rate was also slightly higher than most surrounding communities. The abundance of rental housing may provide an explanation for the higher vacancy rates.

## Housing Age and Condition

The median year that housing structures were built in Meriden, as stated by the U.S. Census Bureau, is 1958.

- 34% of Meriden's housing stock was built in 1939 or earlier.
- 60% of Meriden's housing structures were built between 1940 and 1990.
- 6% of the housing stock was built between 1990 and 2006.

Though the City's historic housing stock is an asset to the community and adds character attractive to visitors or new residents, the age of housing structures also adds to the amount of substandard housing conditions throughout the City and can affect the availability of a variety of housing types. Many older homes are difficult and expensive to maintain resulting in the rising number of deteriorating homes in need of revitalization. Housing rehabilitation is a significant factor in maintaining the City's affordable housing stock. However, the cost of rehabilitating a home continues to rise due to high prices for material and labor. This makes it difficult to perform even standard maintenance to homes. If the home is considered a historical structure the cost of rehabilitation could be increased even more due to strict code regulations.

#### **Housing Costs**

As of 2006, the median value of a home in the City of Meriden was \$203,000 and that price increases in 2007 to \$205,500. These prices are still well below the median sales prices of surrounding communities which range from \$245,000 to \$344,000. Though Meriden's home values have increased, the trends show that prices in other parts of the region are growing at a similar, if not greater, rate resulting in Meriden's housing stock being amongst the most affordable in the region.

Meriden's median rent in 2000 was \$618, the lowest rental rate amongst the surrounding communities and again rather affordable. Meriden, Middletown, and some of Wallingford contain the region's vast majority of rental housing. In 2000, 40% of the areas rentals fell between the \$500-749 range and approximately 11% of rental units were renting for more than \$1,000 per month.

#### Overcrowding

A household is considered to be overcrowded when the unit contains more than one occupant per room. The City of Meriden demonstrates relatively low levels of overcrowding with owner-occupied housing experiencing less overcrowding then rental units. For owner-occupied housing there are no units that contain more than two occupants per room.

Owner households

Renter households 2%

## IV. FAIR HOUSING LEGAL STATUS

The City recognizes that reviewing and evaluating housing discrimination reports filed within Meriden is imperative to identifying patterns or trends affecting fair housing opportunity. Several agencies are available in Connecticut and Meriden to either provide referrals or to receive housing complaints including the City of Meriden's Law Department, the Connecticut Fair Housing Center, and the State of Connecticut's Commission on Human Rights and Opportunities. The Connecticut Fair Housing Center is a lead agency in Connecticut dedicated to fair housing opportunity and provides education, informational, and training services to communities and also meets directly with potential victims of housing discrimination. The Center has provided information to:

- Residents and staff of homeless shelters;
- · Social workers assisting families with children;
- Nursing home residents moving into the community;
- Social service agencies assisting clients with housing searches;
- Domestic violence advocates;
- Housing counselors; and
- Section 8 staff members.

To analyze potential impediments to fair housing choice, information from the Connecticut Fair Housing Center, the City of Meriden's Law Department, and the State of Connecticut's Commission on Human Rights and Opportunities was evaluated. The City requested and reviewed information on the number and types of complaints filed, involving the City of Meriden, and alleging housing discrimination. The figures below demonstrate housing inquiries and complaints involving Meriden since 2005.

Figure 5
Inquiries Received by the Meriden Law Department
July 2007 - June 2009

Complaint Regarding	Number of Complaints Received
Heat	16
Security Deposits	11
Eviction Procedures	₹ 49
Foreclosure	21
Housing & Disabilities	9
Conditions/Repairs of Rental Unit	11
Problems with Landlord	35
Rent Increases	13
Housing for Families with Children	2
Rights and Responsibilities for Landlord/Tenant	21
Housing and Human Rights	3 8
Homelessness	6
Elderly and Housing	5
Financial Assistance for Rent/Relocation	5
Purchase of Foreclosed Homes	31

<sup>\*</sup>Source: City of Meriden Law Department

Inquiries to the Law Department are received on an informal basis and are usually resolved in person, over the phone, or by mailing out information. If the case cannot be resolved in this manner it is referred to state agencies or legal services including:

- Meriden Social Services of the Meriden Health Department;
- New Opportunities/Meriden;
- Meriden Housing Authority;
- CT Legal Services;
- New Haven County Bar Association Legal referral program;
- Meriden Superior Court Services Center;
- Department of Social Security;
- Office of Protection and Advocacy for Persons with Disabilities;
- CT Commission on Human Rights & Opportunities;

- · Center for Disabilities Rights; and
- CT Women's Legal and Education Fund.

The State of Connecticut's Commission on Human Rights and Opportunities received a total of 908 fair housing complaints from 2005-2009. Of the total number of reports filed, 26 involved the City of Meriden. The majority of the complaints received involved persons with disabilities with 22 complaints reporting a mental, physical, or learning disability as the basis for discrimination. Reports filed also involved 1 age related, 1 retaliation case, 2 cases citing race/color as the basis for discrimination, and 3 claiming sexual orientation. Some reports cited more than one basis for discrimination. Reasonable accommodation was cited in 20 claims as the discriminatory practice, 5 cases cited terms or conditions of sale, and 1 case cited retaliation. The figure below demonstrates fair housing complaints received by the Commission on Human Rights and Opportunities from 2005-2009.

Figure 6
Fair Housing Complaints
Connecticut Commission on Human Rights & Opportunities

	Practices C	(e) as Dis	eriminatory	Resolved/Withdrawn Complaints				
Type of Discrimination	Canditions of Sale or Rental	Refusal to Rent	Reasonable Accommodation	Retaliation	Number of Fair Housing Complaints Successfully Resolved/No Reasonable Cause	Number of Fair Housing Complaints Withdrawn W/o Settlement	Number of Fair Housing Complaints Referred to Other Agencies	
Race/color:		0	en i de despera	0	12 15 O. O. O. O. O.	2 1	0.00	
Box 1 1 2 2	2.00	7.0	0	0.11	0	0	0	
Religion	0.50		0.00	0	3.70	O.	100	
National Origin	0.	- 6	0		0	0.0	0	
Disability			2.20		n terrifora	4		
Familial Status		0.5	0 .		0	0	0	
Sexual Orientation	3.	0						
Retaliation	0	0.5	0		1	0	0	
Age .		0		1100	70.20	0.00		

<sup>\*</sup>Some reports claimed more than one type of discrimination as the basis.

If an individual feels that they have been discriminated against in regards to the purchase or rental of housing, they may contact the Connecticut Fair Housing Center or the Commission on Human Rights and Opportunities to file a formal complaint.

Further, if an individual feels that their housing rights have been violated and would like to make a complaint to the Department of Housing and Urban Development (HUD), they have one year from the

<sup>\*</sup>Source: Connecticut Commission on Human Rights and Opportunities

date of occurrence to file a formal report. HUD will initiate an investigation and if it is determined that there is reasonable cause to believe discrimination has occurred the Secretary of HUD will charge the respondent with violating fair housing laws. Upon a formal charge being issued a HUD Administrative Law Judge (ALJ) will hear the case and issue an initial decision. In the event the parties involved elect to have their case heard in federal court the Department of Justice (DOJ) will commence a civil action.

Between 2005 and 2009 there have been no fair housing complaints involving the City of Meriden where the Secretary of HUD has issued a charge against a respondent and no complaints required a decision by a HUD Administrative Law Judge.

## V. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING

#### **Public Sector**

Public policies, practices, and procedures can directly affect housing choice making it imperative to review and evaluate possible actions or omissions in the public sector including public housing, community development, transportation, and community services.

#### Zoning and Site Selection

The City of Meriden's Zoning Codes are established in Chapter 213 of the City's Municipal Code and is known and cited as the "Zoning Ordinance of the City of Meriden, 1983."

The code defines 24 zoning districts divided into four classes including residential, commercial, industrial, and special districts. Two of the residential districts specifically permit multi-family uses, one district allows for the conversion of single-family units to four units, and one residential district specifically permits two and three family housing. Four commercial districts and three special districts specifically permit multi-family uses. The City's code also contains one district specifically dedicated to elderly housing.

Acknowledging that the City has faced increased urbanization and that the demand for housing was undergoing substantial and rapid changes, the City included in its codes a Planned Residential District with the intentions of encouraging variety and flexibility in land development for residential purposes. Planned Residential Districts are also specifically intended to encourage innovations in residential development so that the growing demands for housing of different types at all economic levels may be met through a greater variety in the type, design, and siting of dwellings. Planned Residential Districts also promote fair housing by establishing that there shall be no restrictions in the sale or lease of any property or dwelling unit within such development or membership in any association of residents in such development based on race, religion, creed, or national origin.

To encourage flexibility in the innovation and design of single-family residential developments that cannot be achieved on many sites due to conventional zoning restrictions, the City established Planned Residential Cluster Developments. This method of development permits a variation of lot sizes without an increase in density.

The City's code also provides for a Planned Elderly Housing Community specifically permitting the creation of developments for the elderly providing for a continuum of care including detached and attached residential units.

Figure 7
Districts Permitting Multi-Family Housing

District (1997)	Minimum Lot Requirements		Minimum Yard Requirements			
	Lot Area (SF)	Area Per Unit (SF)	Front	Rear	Side	
R-2 Two-Three Family Residential	12,000	4,000	25	10	25	
R-3 Multi-Family Residential	10,000	2,500	25	10	25	
R-4 Multi-Family Professional	15,000	2,000	35	25	25	
C-1 Central Commercial	4,000	500	-	10	15	
C-2 General Commercial	15,000	1,500	35	- 25	25	
C-4 Convenience or Neighbor. Commercial	12,000	4,000	25	10	25	
Neighborhood Commercial Design (NCDD)	10,000	3,000	20	10	25	
Planned Residential Development (PRD)	12,000	4,000	25	10	25	

\*Source: City of Meriden zoning "Schedule"

Meriden is currently zoned so that the major land use category is residential. According to the City's 2009 Plan of Conservation and Development update, existing zoning regulations allow for approximately 6,000 new dwelling units to potentially be developed in the City. The City's residential development density also appears to be standard for a city of its size and composition. Meriden has the second highest rate of multi-family units in the region.

A review of the City's zoning codes and the Plan of Conservation and Development indicate that current zoning regulations are flexible in allowing a wide range of densities and housing types and that Meriden has built more affordable housing in the past ten years than any surrounding community with 3,572 affordable units as of 2006.

## Community Revitalization and Municipal Services

Neighborhood revitalization efforts and the provision of municipal services are imperative to housing choice. The City funds and implements various programs with a focus on neighborhood preservation and the provision of public services. In an effort to support suitable living environments and ensure neighborhood livability, the City continues to implement various code enforcement programs and undertake demolition activities to eliminate hazardous structures in Meriden neighborhoods. The City offers a variety of public service programs providing assistance to many low-income residents. The provision of sufficient public services remains a high priority for the City of Meriden. Public service

activities include employment training, literacy skills outreach, assistance to victims of domestic violence and sexual assault, youth development and recreational services, shopping and chore services for the elderly, safety planning, parenting support, racial relationship building, and soup kitchen services. The target populations to be served by these services include youth, seniors, low-income residents, the homeless, and the disabled.

In addition, the City's Public Works Department assists in maintaining neighborhood livability. The Public Works Department operates various divisions including Curbside Recycling, Engineering, Highway Division, and the Traffic and Fire Alarm Division. The Engineering division of the Public Works Department issues right-of-way permits, storm and sanitary sewer permits, and sidewalk and driveway permits. This division is also responsible for various project stages including studies, analysis, design, surveys, and project management. Recent projects the Engineering Division was involved in include the reconstruction of Bradley Avenue and Coe Avenue bridges, realignment of Britannia Street, Colony Street, and Kensington Avenue, and North Colony Street reconstruction. The Highway Division provides paving, pothole repair, curbing repair and replacement, leaf collection, street sweeping, emergency calls for floods and storms, sanitation and recycling, and street maintenance. To provide safe neighborhoods the Traffic and Fire Alarm Division provides maintenance of all traffic signals on City streets and all traffic safety including traffic lights, signs, and pavement markings, fire alarms, and downtown streetlights.

The City also has 24 municipal parks citywide that are available and accessible to all residents at all income-levels. The Parks Division is responsible for the maintenance and improvement of the parks and their facilities.

Review of public service programs offered in the City of Meriden does not reveal any apparent impediments in the quality of services provided.

#### Employment, Transportation, and Housing

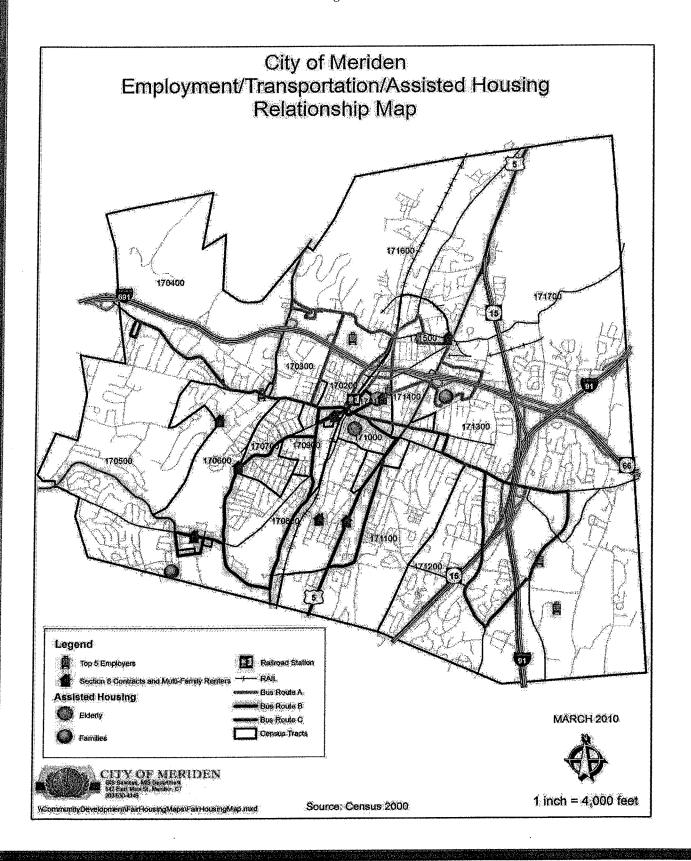
Identifying the relationship between major employers and transportation accessibility can be vital to housing choice. The five major employers in the City of Meriden include MidState Hospital, Carabetta Management, Hunters Ambulance Service, Cuno, Inc., and RFS Cablewave. According to City-Data.com, there are 10,158 workers who live and work in the City of Meriden. There is a daytime population change due to commuting of approximately -3,242 or -5.6%.

The Meriden train station is currently served by Amtrak, enabling commuters to travel to either Hartford or New Haven by train and providing access to the Metro North and Shoreline East rail services by way of the New Haven connection. Approximately six trains commute from Meriden daily to New Haven and Hartford. The Meriden rail station, located on State Street, also serves as the hub for three bus routes serving the City including the Yale Acres — Westfield Shoppingtown line, the Kohl's Plaza — South Meriden line, and the West Main Street — East Main Street line. Frequency of service varies with the Yale Acres — Westfield Shoppingtown line and the Kohl's Plaza — South Meriden line offering the most frequent service starting at 6:30 a.m. and running to approximately 6:00 p.m.. The Meriden Senior

Center also offers free mini bus transportation service for residents over 55 and for the disabled over 18 to multiple destinations within the City.

Meriden does offer public and assisted housing locations with access to the rail station hub by either the three operating bus routes or within walking distance. Bus routes also offer transportation to a majority of the City's top five employers. The City recognizes the need for a good relationship between affordable housing, transportation, and its major employers and will continue efforts to promote fair housing choice for lower income groups by assisting in eliminating restricted housing adjacent to congested and blighted areas close to the rail station. The Connecticut Department of Transportation has also selected the Meriden rail station as an "action station" for its implementation strategy. Work proposed includes a multimodal transportation center, increasing access to transportation.

Figure 8 below shows the employment, transportation, and assisted housing linkage in Meriden.



#### **Public Housing Policies**

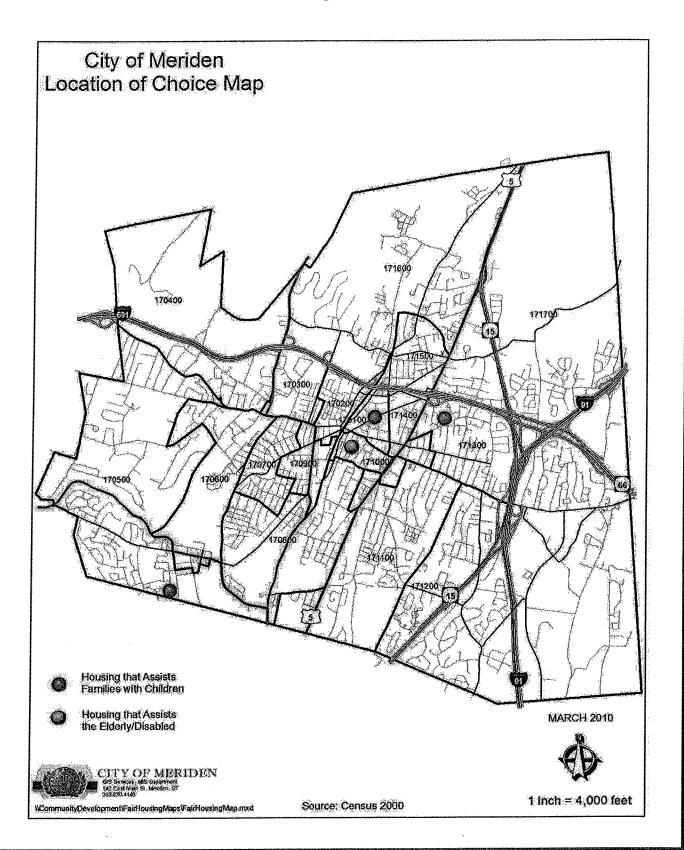
Connecticut Public Housing Authorities were created by the Connecticut Legislature in an effort to provide housing for low income persons. Although the Housing Authority in Meriden operates under federal and state regulations, the MHA does work closely with the City Manager and other departments within the City of Meriden in a cooperative effort to resolve housing issues for low and moderate income persons. The Meriden Housing Authority is an autonomous body established in 1943 and is governed by a board of five commissioners. A commissioner's term is for a period of five years. The purpose of the Board of Commissioners is to formulate policy for the Meriden Housing Authority, with the Executive Director administering daily operations. The Meriden Housing Authority operates under the Department of Housing and Urban Development's (HUD) regulations for federal developments, and both the Connecticut Housing Finance Authority (CHFA) and the Department of Economic and Community Development (DECD) for state developments.

The Meriden Housing Authority (MHA) currently provides 361 units of federal Public Housing at Mills Memorial (140) and Community Towers (221). Chamberlain Heights has been removed from the Federal program for rehabilitation. MHA has received the Low Income Housing Tax Credits (LIHTC) for Chamberlain Heights. When completed, it will provide affordable housing to residents at 60%, 50%, and 20% of the area median income. It will also have 61 Project Based Vouchers (PBV). In this project MHA will provide 25 supportive housing units targeting homeless families. They will have supportive services provided by two case managers via Rushford Hospital. Additionally, MHA has received 66 new Section 8 vouchers in the past 12 months for relocation of the Chamberlain Heights residents. The waiting list for assisted units is approximately three to six months with units for families being in higher demand then those assisting the elderly. Meriden also has approximately 1,500 privately managed assisted units, 20 units of deed restricted housing, 714 units of housing occupied by persons receiving federal or state rental subsidies, and 1,250 active CHFA mortgages.

Currently the MHA assists 722 Section 8 Housing Choice Vouchers (HCV) residents. That is the number of vouchers MHA currently has been allocated by HUD. MHA is utilizing the HCV program at the 100% level. The Meriden Housing Authority will secure additional Section 8 Housing Assistance vouchers as they become available so that more individuals can be served. MHA also has and 215 units of State Moderate Income housing at Johnson Acres (52) and Yale Acres (163). MHA has also invested over \$900,000 in modernization upgrades. To address chronic homelessness, the Meriden Housing Authority plans to implement several new activities specifically targeting homeless families.

Rents associated with the federal developments are in accordance with HUD regulations and are 30% of the total income of the household. This is monitored through a yearly income verification to determine any income changes. Eligible applicants are those whose income is within the limits as determined by HUD.

Figure 9 shows assisted housing in Meriden that rents to families with children, disabled persons, and the elderly.



#### **Housing Authority Programs**

The Meriden Housing Authority offers and administers the Family Self-Sufficiency Program (FSS) and Homeownership Program which are eligible to Housing Choice Voucher participants.

The Family Self-Sufficiency Program is a voluntary program for families with the objective of assisting families in obtaining employment allowing them to no longer depend on welfare assistance. Over a five-year period, families work with FSS Coordinators to develop goals leading to self-sufficiency. Goals often include education, specialized training, job readiness and job placement activities, and career advancement objectives.

The Homeownership Program is available to participants of the FSS program. Homeownership allows first-time homeowners to use voucher subsidy to meet monthly expenses. Participants of the program must be eligible under HUD's Section 8 regulations, meet discretionary requirements, the Meriden Housing Authority elects, and they must be first-time homebuyers. Homeownership counseling is also a requirement of the program.

#### **Housing Authority Services**

The Meriden Housing Authority offers several resident service programs funded through the Department of Housing and Urban Development. These programs include:

- After School Homework Programming;
- Resource Center Program;
- Satellite Teen Center Programming;
- Head Start Satellite Classroom;
- · Computer Training Program; and
- Welfare to Work.

The Meriden Housing Authority has managed and maintained federal units well however, the need for rehabilitation of complexes still remains and exceeds resources available. Improvement needs identified include making units handicapped accessible, parking lot security, replacement roofing, repainting of interiors, upgrades to entrances to enhance security, upgraded bath tubs, and sidewalk improvements. In addition, enhanced security, job training, resident organization training, self-sufficiency efforts, first-time homeowner opportunities, drug education, non-standard hour day care, and assistance with obtaining needed services have been identified as priority supportive service needs. Though the Housing Authority cannot address all needs due to lack of funding, it has initiated activities and has identified the need to assist public housing residents achieve self-sufficiency. MHA recently spent \$900,000 on public housing modernization projects.

#### Displacement

The City of Meriden participates in the Neighborhood Stabilization Program (NSP) through HUD and will be re-launching its Neighborhood Preservation Program (NPP), which is a housing rehabilitation program, in July of 2010. As part of its Consolidated Plan under 24 CFR, Part 91, the City must certify that it has in effect and is following a Residential Antidisplacement and Relocation Assistance Plan (RARAP). The plan shall indicate steps that will be taken to minimize the displacement of families and individuals from their homes and neighborhoods as a result of federally assisted activities. The plan is required to provide one-for-one replacement units to the extent required.

The City has an updated RARAP developed in accordance with the Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and with Section 104(d) of the Housing and Community Development Act of 1974 (HCD Act of 1974), as amended. The City will comply with all federal regulations governing anti-displacement and relocation assistance.

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act (1974), the City of Meriden will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- 1. Coordinate code enforcement with rehabilitation and housing assistance programs.
- 2. Evaluate housing codes and rehabilitation standards in reinvestment areas to prevent undue financial burden on established owners and tenants.
- 3. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first.
- 4. Adopt policies to identify and mitigate displacement resulting from intensive public investment in neighborhoods.
- 5. Adopt policies which provide reasonable protections for tenants faced with conversion to a condominium or cooperative.
- 6. Adopt tax assessment policies, such as deferred tax payment plans, to reduce impact of increasing property tax assessments on lower income owner-occupants or tenants in revitalizing areas.
- 7. Provide counseling or referrals to provide homeowners and tenants with information on assistance available to help them remain in their neighborhood in the face of revitalization pressures. Any displaced tenants or owner-occupants will be provided with advisory services or referral.

Should the City of Meriden acquire for the purpose of rehabilitation property subject to the URA using CDBG Entitlement or NSP funds, the City will complete the following:

- 1. Notification Any occupants who may be relocated, either temporarily or permanently, will be provided 90 days written notice to vacate.
- 2. Advisory Services Any displaced tenants or owner-occupants will be provided with relocation advisory services.
- 3. Moving Expenses Any displaced tenants or owner-occupants will be reimbursed for reasonable and customary moving expenses.
- 4. Replacement Housing Displaced tenants or owner-occupants will receive payment for the added cost (over and above the costs they are currently supporting) of renting or purchasing comparable replacement housing.

#### Tax Policies

The City of Meriden's property tax policies are found in Chapter 187 of the municipal codes. According to Article IV, Municipal Property Tax Relief, Section 187-10 provides tax relief to any taxpayer 65 years of age or over, his or her spouse, living with the taxpayer, who is 60 years of age or over and also for taxpayers under age 65 who are eligible in accordance with applicable federal regulations to receive permanent total disability benefits under Social Security. Taxpayers eligible under the above criteria can also apply for a tax deferral of 50% of the property taxes at an annual interest rate of 7 ¾ percent or tax abatements based on income. This policy helps to keep housing affordable for the elderly and disabled. Section 187-13 under Article IV also provides tax relief to owners of units in a cooperative. This assists in providing affordable housing opportunities to person of low-and moderate-income.

Article VII, Exemptions from Assessments and Taxes, encourages maintaining Meriden's housing stock. Section 187-20, Urban Rehabilitation Homeownership Program, allows the assessor to enter into an agreement with any real property owner who agrees to rehabilitate their property with assistance provided by the Connecticut Housing Finance Authority under the Urban Rehabilitation Homeownership Program. The agreement provides that any increase in assessment due to rehabilitation will be deferred for a period of five years.

Additionally, the State of Connecticut allows the option for municipalities to provide additional exemption for veterans under Connecticut General Statute 12-81bb and also allows for municipalities to provide property tax credits for affordable housing deed restrictions. The Disabled Veteran's Property Tax Exemption law excludes veteran's disability payments when determining income-based property tax exemptions for veterans, the blind, and people with total disabilities. State mandated exemptions are granted through two statutes, one requiring towns to give all qualified applicants a basic \$1,000 property tax exemption and the other requiring towns to give veterans who get the basic exemption an additional exemption, the amount of which depends on their income. The law also requires towns give \$1,000 property tax exemption to people who are totally disabled and the blind. Connecticut General Statute 12-65 also allows agreements fixing assessments on multi-family housing. Section 187-21 of Meriden's code adopts state regulations at Section 12-81 identifying tax exempt organizations.

State law also provides a reimbursement program for Connecticut renters who are elderly or totally disabled, and whose incomes do not exceed certain limits. Persons renting an apartment or room, or living in cooperative housing or a mobile home may be eligible for this program. Renters' rebates can be up to \$900 for married couples and \$700 for single persons.

#### **Boards and Commissions**

The City of Meriden has numerous boards and commissions that meet monthly. The Mayor and City Council encourage citizens to attend any public hearings. Many of the City's boards and commissions also serve in an advisory capacity to the Mayor and City Council.

#### **Board of Ethics**

Chapter 7 (C7-8) of the City's codes establishes the Board of Ethics. The Board of Ethics consists of five members and was established with the purpose of providing a code of ethics outlining guidelines for ethical standards of conduct for all City officials, employees, and contractors.

#### **Human Rights Office**

The Human Rights Office, which administers the commissions below, is responsible for the implementation and enforcement of Chapter 101 of the City Code, or the "Equal Opportunity Ordinance". Section 101-3 of the City code establishes a Human Rights Advocacy Program to be administered by the Human Rights Advocate. The Human Rights Advocate is responsible for prohibiting discriminatory employment, public accommodations, and housing practices. The Human Rights Advocate also acts as a liaison to any boards and commissions as deemed necessary by the City Manager.

#### Commission for Persons with Disabilities

The Commission for Persons with Disabilities is a seven member commission under the Human Rights Division. This commission serves as a clearinghouse for information providing publications to the public promoting awareness regarding persons with disabilities. The commission acts as an advocate for new programs and services serving the disabled. The commission also performs accessibility audits of public buildings and reviews accessibility complaints.

#### Human Rights Advisory Board

The Human Rights Advisory Board is a nine member advisory board that assists in determining the conditions, needs, and problems concerning human rights in the City of Meriden. The board reviews issues and makes recommendations to the City Manager, Director of Human Rights, and the Human Services Committee of the City Council. The Advisory board monitors the actions of the City of Meriden as well as the community.

#### **Neighborhood Preservation Advisory Board**

The Neighborhood Preservation Advisory Boards responsibilities include establishing policy per the Inner Core Task Force Report adopted by City Council August 14, 1994 and exercise policy oversight on neighborhood preservation and rehabilitation initiatives and activities.

The City of Meriden has several other boards and commissions established to perform specific duties as established in the Connecticut General Statutes. The following boards and commissions help to provide efficient, orderly, economical, and coordinated operation of the municipal government and also assist in encouraging fair housing efforts.

- Zoning Board of Appeals;
- Planning Commission; and
- Building Code Board of Appeals;
- Design Review Board; and
- Conservation Commission.

The City of Meriden amended its code in 1989 to include Chapter 6, Article XXXII, designating the Council of Concern Housing Development Corporation as a Housing Site Development Agency responsible for the property known as the Columbia Street/Platt Avenue Extension. The purpose of the agency was to secure funding from the State Housing and Community Development Program for the development of cooperative housing affordable to families of low-and moderate-income.

In accordance with Chapter 43 of the City's code and pursuant to Chapter 127 of the Connecticut General Statutes, the City of Meriden joined the Regional Planning Agency for the South Central Region as defined by the Connecticut Development Commission. The City has three representatives to the agency.

The City of Meriden also has over a dozen neighborhood associations consisting of residents and business owners who act to bring safety, pride, and a sense of togetherness to their neighborhoods. The City's community police officers and code enforcement officers support activities undertaken by the council of neighborhood associations.

Meriden's Boards and Commissions, agencies, and associations were established in the best interest of residents and the overall review of such indicates that the Boards and Commissions in place provide adequate protection for Meriden citizens.

#### **Building Code Compliance**

Meriden's permitting and building construction codes found in Chapter 77 are designed to protect the public safety and welfare of residents and the Housing Codes found in Chapter 125 upholds the idea of safe, clean, and sanitary housing.

The Code Enforcement Division is the primary department handling housing code compliance in Meriden with the main objective of ensuring a high quality of life in residential buildings. Code Enforcement housing inspectors conduct inspections of rental units to determine compliance with

housing codes and protect existing housing stock. Code Enforcement also conducts exterior surveys and investigates all complaints regarding sub-standard, unsafe, and unsanitary housing conditions. The division provides Certificates of Compliance for rental units and rooming houses and also tracks suspected code violations enforced by other departments for referral to the appropriate agency for action.

The Building Division administers the review of applications for permits including building, electrical, plumbing, mechanical, and issues Certificates of Occupancy. The Building Division also conducts field inspections to ensure work being performed is in compliance with building codes and city regulations. This division ensures all buildings in the City are structurally stable and conform to all building codes, city codes, and city ordinances. The Building Division oversees erection of all structures, additions, alterations, repairs, removals, demolitions, and installation of mechanical equipment.

#### Accessibility

As of March 6, 1991, the Department of Housing and Urban Development (HUD) adopted Fair Housing Accessibility Guidelines to provide builders and developers with technical guidance on how to comply with the specific accessibility requirements of the Fair Housing Amendments Act of 1988.

The Connecticut State Office of Protection and Advocacy for Persons with Disabilities provides information and services to advance the cause of equal rights for persons with disabilities and their families. The Office of Protection and Advocacy offers information regarding accessibility including the Accessible Travel Guide and the Emergency Shelter Accessibility Checklist. These informational pieces provide educational information on accessibility requirements and how to include accessibility standards into the planning process.

The Connecticut Fair Housing Center also provides an informational brochure related to accessibility for people with physical disabilities. The brochure outlines reasonable accommodation requirements and landlord requirements for installing ramps and elevators.

For persons with disabilities, accessibility means more than just an accessible entrance to a structure. Accessibility encompasses interiors and exteriors of buildings as well as accessible routes, streets, and sidewalks. Chapter 180, Article III of the City's code prohibits the obstruction of streets and sidewalks. This ordinance helps to assist persons with disabilities. Section 180-29 also provides restrictions for placing materials on the street.

## **Private Sector**

Lending policies and procedures can have a significant impact on fair housing choice. It is critical for potential homeowners and current homeowners looking to refinance or rehabilitate their home to have access to affordable and non-discriminatory financing.

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975, is implemented by the Federal Reserve Board's Regulation C. The regulations apply to certain financial institutions including

banks, savings associations, credit unions, and other mortgage lending institutions. HMDA information is collected from public lending institutions and discloses public loan data used to:

- Determine if financial institutions are serving community housing needs;
- Assist public officials with public sector investment to help attract private investment to areas of need; and
- Identify possible discriminatory lending patterns and enforce anti-discrimination statutes.

The HMDA requires lenders to disclose home mortgage and home improvement lending transactions. Data collected for Meriden was analyzed and the table below consists of the aggregate disposition of loan applications by location of property and type of loan. Categories of information collected include FHA, FSA/RHS & VA, conventional, refinancing, home improvement loans, and loans on dwellings for five or more families. Figure 10 demonstrates aggregate mortgage loan applications for Meriden in 2008. Appendix C includes the data tables used to calculate the information in this section by census tract for Meriden.

Figure 10
HMDA Aggregate Loan Applications for Meriden

	FHA, FSA/RHS&VA		Conventional		Refinancing		Home Improvement		Loans on Dwellings for 5 or more families	
	#	3000Ys	#	\$000's		5/0000/5	#	3(0)00/3	#	\$000's
Loans Originated	246	43,848	294	45,929	707	104,417	157	10,365	19	13,402
Approved, Not Accepted	20	3,707	37	5,667	180	25,058	85	1,376	1	- 2,600
Applications Denied	49	8,439	82	12,176	683	114,583	149	5,766	4	142
Applications Withdrawn	31	5,374	33	4,909	255	41,073	22	1,389	-	Ž.
Files Closed for Incompleteness	6	1,107	15	2,778	53	10,449	8	293	-	-
Total	352	62,475	461	71,459	1,878	295,580	371	19,189	24	16,144

<sup>\*</sup>Source: Home Mortgage Disclosure Act (HMDA)

In 2008 (the most recent data available) there were 20 loans totaling \$3.7 million that were approved but not accepted through FHA, FSA/RHS & VA.

There were a total of 461 conventional loan applications totaling \$71 million. Of the total conventional loans 294 were originated, 37 were approved but not accepted, 82 were denied, 33 applications were withdrawn, and 15 were closed for incompleteness.

Refinancing loan applications totaled 1,878 for an amount of \$296 million. Of the total refinancing loans 707 were originated, 180 were approved and not accepted, 683 were denied, 255 were withdrawn, and 53 were closed for incompleteness.

Home improvement loan applications totaled 371 for an amount of \$19 million. There were 157 home improvement loans originated, 35 approved but not accepted, 149 denied, 22 withdrawn, and 8 closed for incompleteness.

Applications for dwellings for five or more families totaled 24 for an amount of \$16 million. Of the total loan requests, 19 loans were originated, 1 was approved but not accepted, and 4 were denied.

Review of the above data reveals that for all categories the percentage of loans denied is higher than for loans approved. The recent changes in loan products, the foreclosure crisis nationwide, effects of subprime lending, and the housing market in 2008 are probable causes for the higher percentage of loan denials.

Figure 11 below demonstrates home purchase, home improvement, and refinancing loan applications by race and income for the entire New Haven - Milford MSA/MD. Applications that were denied were largely due to debt to income ratio or credit history.

Figure 11
Home Purchase/Home Improvement/Refinancing Loan
Applications by Race and Income
New Haven – Milford MSA/MD

	Applications Received	Loans Originated	Approved but not Accepted	Denied	Withdrawn	Closed for Incompleteness
Asian	1	1.0	1.1		7.7	
African American	2	•	_	1	1	_
Hispanic	8	$1^{\frac{2n}{n-1}}$		5	18 18 18 18 18 18 18 18 18 18 18 18 18 1	
>50 of MSA/MD Median	30	12	4	8	1	5

The Private Mortgage Insurance Companies (PMIC) also compiles data on the disposition of applications for mortgage insurance from eight major private mortgage insurance companies.

Figure 12 demonstrates mortgage insurance loan applications in Meriden from private mortgage insurance companies for 2008, which is the most recent data provided from PMIC.

Figure 12
PMIC Aggregate Insurance Loan
Applications for Meriden

	FHA, FSA/RHS&VA	Conv	entional	Rel	financing		Home provement	Loans on Dwellings for 5 or more families
	# \$000%	#1	\$000's	#	-5000's	#	\$000's	#75.28000/5
Loans Insured	-	98	17,973	72	13,943	12	2,269	-
Approved, Not Accepted		40	7,523	36	7,456	11	2,574	
Applications Denied	-	9	1,480	10	2,019	1	209	-
Applications Withdrawn		4	788	1.	188	2	398	erge of the first
Files Closed for Incompleteness	-	3	561	2	363		-	-
Total		154	28,325	121	23,919	26	5,450	1

<sup>\*</sup>Source: Private Mortgage Insurance Corporations data (PMIC)

In 2008, there were a total of 154 conventional loan applications that amounted to \$28 million. Of the total conventional loan applications, there were 98 that were insured, 40 were approved but not accepted, 9 were denied, 4 were withdrawn, and 3 were closed for incompleteness.

There were 121 refinancing loan applications totaling \$24 million. Of the total refinancing loans 72 were insured, 36 were approved but not accepted, 10 were applications were denied, 1 was withdrawn, and 2 were closed for incompleteness.

Home improvement loan applications totaled 26 for an amount of \$5 million. Of the total home improvement loans 12 were insured, 11 were approved but not accepted, 1 application was denied, and 2 applications were withdrawn.

There were no applications for dwellings for 5 or more families.

For the New Haven – Milford MSA/MD, no applicants for insurance loans were of the Asian, African American, or Hispanic race/ethnicity and no applicant incomes were less than 50% of the MSA/MD median.

### Real Estate Market Factors

Consistent with national statistics, housing affordability in the State of Connecticut continues to be a problem. The City of Meriden's 2009 Plan of Conservation and Development states that "the cost of housing is the result of a variety of factors including the demand for a specific location, availability of buildable land, and labor and material costs". Others factors to the lack of affordable housing include interest rates, job growth, and local economic conditions.

As of 2006, the median value of a home in the City of Meriden was \$203,000 and that price increases in 2007 to \$205,500. These prices are still well below the median sales prices of surrounding communities which range from \$245,000 to \$344,000. Though Meriden's home values have increased, the trends show that prices in other parts of the region are growing at a similar, if not greater, rate resulting in Meriden's housing stock being amongst the most affordable in the region.

Meriden's median rent in 2000 was \$618, the lowest rental rate amongst the surrounding communities and again rather affordable. Meriden, Middletown, and some of Wallingford contain the regions vast majority of rental housing. In 2000, 40% of the areas rentals fell between the \$500-749 range and approximately 11% of rental units were renting for more than \$1,000 per month.

The 2009 Plan of Conservation and Development examined a sample of units of various housing types for rent in 2007. Six apartment complexes were identified and revealed the following monthly rental rates:

One bedroom: \$685 - \$1,430
 Two bedroom: \$790 - \$1,695
 Three bedroom: \$855 - \$1,340

Apartments for rent in multi-family structures revealed lower monthly rents of:

Studio/One bedroom: \$500 - \$850
 Two bedroom: \$500 - \$895
 Three bedroom: \$795 - \$900

One-bedroom condominiums ranged from \$650 - \$900 and two-bedrooms from \$1,100 - \$1,250. Homes for rent accounted for the upper end of the market price range with three and four-bedroom units available from \$1,150 - \$1,950 per month.

The current market has affected the economy in many ways across the nation and people are being faced with the struggles of owning a home or buying a home as a result. Lending institutions are changing their policies and re-designing lending programs, making it much harder for potential buyers to

get financed. Confidence amongst lenders has plummeted and needs to be increased encouraging them to lend to one another again. Credit struggles have impacted mortgages in several ways including:

- More strict lending conditions;
- Increased interest rates;
- Increased deposit requirements;
- Decrease in mortgage products;
- Increase in arrangement fees; and
- Decreased mortgage lending approvals.

Lenders are being very cautious regarding who they will lend to and about taking in new business. Many people cannot get financed because they cannot meet the new strict requirements or eligibility criteria. Even if potential applicants meet the eligibility requirements of the lending institution, high interest rates make it very difficult for homeowners to get an affordable mortgage payment. Many lenders are also asking for a 10% deposit instead of the typical 5% which is also making it near impossible for first-time homebuyers who have no savings or previous property to take equity from to get a loan.

Mortgage products available have also dropped by two thirds percent. This is limiting the choices that consumers have and limiting the chances for consumers to get a mortgage. Many lenders have eliminated important mortgage products such as the 125% and 100% mortgages as well. A combination of tighter lending policies, lack of confidence in buyers, and high housing prices have decreased the mortgage lending levels.

Due to declining value of homes in certain markets, both Fannie Mae and Freddie Mac have announced changes regarding maximum loan levels and that Fannie Mae will be subject to declining market guidelines. Effective January 15, 2008 Fannie Mae implemented a policy to restrict the maximum loan to value ratio and combined loan to value ratio for properties located within a declining market to 5% points less than the maximum permitted for the selected loan product. This means that if an appraiser indicates that the property is located in a declining market, than the buyer may be required to put an additional 5% down.

FHA and VA loans have not changed guidelines significantly like others making the opportunity for 100% financing still available. Both FHA and VA ask for specific details in the appraisal on whether the property is in a declining market or not, but neither program has indicated that they will force the borrower to put more money down.

FHA mortgage rules have changed as well with HUD's Letter 2008-25. This is in response to "walking buyers" who could not sell their homes because they were upside down on the loan. The homeowner would buy an affordable home and rent it, helping them to qualify for a new home. The old home

would then go into foreclosure. FHA has changed this so now there are only certain circumstances where rental income can be used to qualify including:

- The homebuyer must be moving to a new city;
- The new home must be outside reasonable commuting distance from the old home;
- The old home must be leased for at least a year;
- The homebuyer must document the receipt of the security deposit;
- The existing home must have a 25% equity position.

FHA also extended financing for immediate purchase of foreclosed homes in June of 2008. Because of declining home values a policy was implemented that would extend government-backed mortgage insurance and allow for immediate sale of foreclosed properties. Properties will no longer be subject to 90 day waiting periods.

In July of 2008, the USDA Rural Housing lending program was implemented and designed to help lowand moderate-income families purchase homes in rural communities. Some of the benefits of this program include providing 102% LTV financing, available to low-and moderate-income families, no requirement to be a first-time homebuyer, lesser down payment requirements than conventional or FHA loans, no monthly mortgage insurance required; and 30 year fixed rate loans.

The federal homeowner stimulus plan has also been implemented with the purpose of allowing 4-5 million homeowners to refinance mortgages, reducing homeowner's monthly mortgage payments, assisting renters and homeowners displaced or facing foreclosure, and increasing the allowable mortgage backed securities through Fannie Mae and Freddie Mac.

The Housing and Economic Recovery Act (HERA) was signed into law July 30, 2008. HERA appropriates \$3.9 billion in emergency CDBG funding to assist with the foreclosure crisis facing our nation and to help further efforts to stabilize neighborhoods with high foreclosure rates and a significant amount of vacant homes. HERA funds are being distributed through the Neighborhood Stabilization Program (NSP) and the grants are to be considered CDBG funds. Allocations are being made to communities through a formula allocation process determined by HUD. The NSP will be administered by HUD's Office of Block Grant Assistant, within the Office of Community Planning and Development.

In conclusion, many changes have taken place with traditional loan products and guidelines and lending criteria have become much more strict. Interest rates and down payment expectations continue to rise making it hard for potential borrowers to get financing or achieve an affordable mortgage payment. The current credit and market struggles have greatly affected loan products throughout the nation.

### Subprime Lending

A rapid increase in subprime lending posed a serious threat to Meriden's housing market. Subprime loans being disproportionately provided to low-and moderate-income neighborhoods can affect the

financial stability of a community. Subprime loans characteristically have high interest-only payments or adjustable interest rates, which are attractive to homebuyers but lead to payments that are unaffordable for many borrowers. Subprime borrowers tend to end up paying substantially more for their loans than prime borrowers due to higher and adjustable interest rates.

Subprime lending is responsible for the foreclosure crisis nationwide negatively affecting many low-to moderate-income households and neighborhoods. Due to significant subprime lending to low-and moderate-income households, foreclosures increased and homes could not be resold due to the downturn in the for-sale market, leaving homes in low-income neighborhoods abandoned. This also affects the City's property tax revenue and increases the potential for code problems.

The City's percentage of subprime conventional loans ranks 83<sup>rd</sup> of 664 cities in the United States with a population of 50,000 or greater. Meriden's subprime lending rates are similar to surrounding communities but not nearly as pronounced as Hartford or Bridgeport with subprime percentages of 42.2% and 42.8% respectively. The City's 2009 Plan of Conservation and Development indicates that in 2004 32.3% of conventional home purchase mortgage loans issued in Meriden were from subprime lenders and 34.1% of refinancing loans were from subprime lenders. The plan also stated that 50% of refinancing loans to persons of the African-American race and 42.2% of refinancing loans to the Hispanic ethnicity were from subprime lenders.

### **Public and Private Sector**

## Fair Housing Enforcement

The City of Meriden is actively involved in enforcing fair housing through its various programs, public policies, and through fair housing organizations including non-profit organizations.

The Connecticut Fair Housing Center is a non-profit organization dedicated to ensuring equal housing opportunity and is considered to be the lead fair housing agency for New Haven County, including the City of Meriden. The Connecticut Fair Housing Center's enforcement program concentrates on changing illegal discriminatory housing practices with a particular emphasis on those illegal practices which affect low-income households. The Center responds to complaints of fair housing discrimination by investigating evidence to determine if a violation has occurred. The Center's in house attorneys will work to negotiate, mediate, or litigate to resolve discriminating practice and obtain compensation for victims of housing discrimination. Attorneys at the Connecticut Fair Housing Center often enforce actions at the Connecticut Commission on Human Rights and Opportunities, the Department of Housing and Urban Development, and in state and federal courts. The Center also works with private attorneys to better serve the interests of victims.

The Connecticut Fair Housing Center also partnered with the Kirwan Institute for the Study of Race and Ethnicity to conduct a study identifying how to support inclusive, diverse communities of choice. The purpose of the study was to reveal a better understanding of how to promote communities and neighborhoods where families choose to live; where housing and schools are stable and well supported;

where employment is accessible; and where all racial and ethnic groups, and persons with disabilities, are an integral part of the larger community. The Center looked to the Kirwan Institute's work in the area of opportunity mapping to show the relationship between housing, schools, employment, transportation, and health care access and indentify how fair housing can become an intervention point for communities throughout Connecticut.

The City of Meriden's Law Department enforces fair housing by referring discrimination complaints to appropriate agencies, including the Connecticut Fair Housing Center, to be resolved.

The City also enforces fair housing through its Community Development Block Grant (CDBG) program. Through the CDBG program, the City is required to affirmatively further fair housing and is actively involved in the preparation of an updated Analysis of Impediments to Fair Housing Choice (AI). The City collaborates with various public service organizations throughout Meriden to assure that any discriminatory housing practices are eliminated including the Meriden Housing Authority, the Meriden Law Department, New Opportunities, Inc., Meriden Wallingford Chrysalis Inc., and Connecticut Legal Services.

To ensure additional enforcement of fair housing laws, Chapter 122 of the City of Meriden's codes and regulations is dedicated to Housing Discrimination. The purpose of the chapter is to affirmatively further fair housing and equal opportunity for all Meriden residents in accordance with federal and state laws and executive orders related to housing. Chapter 122 is consistent with the United States Constitution, Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Section 109 of the Housing and Community Development Act of 1974, Executive Order 11063, and any other applicable federal or state laws relative to equal opportunity in housing. Chapter 122 outlines prohibited acts in the sale or rental of housing units in the City of Meriden.

The City of Meriden's zoning codes have been developed in a way to protect fair housing choice. Existing zoning policies have allowed for the potential development of approximately 4, 433 additional dwelling units within the City's residential zones and an additional 1,570 dwelling units within commercial zones. Zoning codes also allow for a convenience or neighborhood commercial district with the purpose of providing areas within or adjoining residential neighborhoods for local convenience scale commerce with a range of retail stores and services which cater to daily or recurring needs of nearby residents. Access to essential goods is imperative to fair housing choice. Codes also allow for planned elderly housing communities providing for a continuum of care including detached and attached residential units.

## Informational Programs

The Connecticut Fair Housing Center is the lead agency providing information, education, and training for fair housing throughout the state. Fair housing information is available for all Connecticut residents with a focus on serving low-income households and low-income housing providers. Center staff provides education, informational, and training services on site at the community and also meets directly with potential victims of housing discrimination. The Center provides training programs for

housing providers explaining fair housing laws, giving updates on fair housing court decisions, and answering questions regarding fair housing issues. The Center also provides court ordered training resulting from a fair housing discrimination case and provides training for compliance with Section 504 of the Rehabilitation Act of 1973.

The Connecticut Fair Housing Center also serves as a resource for borrowers, housing counselors, consumer attorneys, and policy makers on foreclosure prevention, responsible lending, and mortgage lending discrimination issues.

The Center has provided information to:

- Residents and staff of homeless shelters;
- Social workers assisting families with children;
- Nursing home residents moving into the community;
- Social service agencies assisting clients with housing searches;
- Domestic violence advocates;
- · Housing counselors; and
- Section 8 staff members.

The Center provides the following information:

#### **Brochures:**

- Information for People with Mental Disabilities;
- Information for People with Physical Disabilities;
- Information for Individuals in Recovery from Drug or Alcohol Addiction;
- Information for Families with Children; and
- Information for Individuals with a Lawful Source of Income.

### Fair Housing Education for Housing Providers:

- Basic Fair Housing Agenda;
- Fair Housing Poster;
- Fair Housing and Section 504 Training Agenda;

- Fair Housing Trainings for Housing Providers; and
- Summary of State and Federal Fair Housing Law.

The Center also provides foreclosure prevention information including a self-help guide, helpful links for borrowers in foreclosure, legal information for homeowners facing foreclosure, and the fair lending policy. The center also offers resources on what opportunities exist in communities. Information and requests for training can be found at <a href="http://ctfairhousing.org">http://ctfairhousing.org</a>.

The City of Meriden's Law Department also acts as a clearinghouse for information regarding housing in Meriden. The Law Department responded to housing inquiries from both landlords and tenants. Upon request, the office distributes pamphlets and detailed information outlining landlord and tenant rights and responsibilities and regarding the eviction procedures for the State of Connecticut. Tenant pamphlets in Spanish and English include:

- How to Keep Utility Service;
- What to do if your Landlord is going through Foreclosure; and
- Tenant's Rights in the areas of:
  - Discrimination;
  - > Eviction;
  - Housing Authority Grievance process;
  - Just Cause Evictions;
  - Lockouts;
  - Rent Increases;
  - Repairs;
  - Security Deposits; and
  - Utilities.

The Law Department provides information on evictions and the court eviction procedures to landlords who seek information on methods of eviction and to tenants who were looking for information on how to represent and defend themselves in eviction proceedings.

The City of Meriden is also actively involved in providing information to the public. Through the Community Development Block Grant (CDBG) program the City is required to affirmatively further fair housing and must provide information regarding fair housing in its Five-Year Consolidated Plan and Annual Action Plan. The City's website also has a link to the Housing Authority's Section 8 Housing Choice Voucher program which provides educational information on the program and how to access it.

### Visitability

The Connecticut State Office of Protection and Advocacy for Persons with Disabilities provides information and services to advance the cause of equal rights for persons with disabilities and their families. The Office of Protection and Advocacy offers information regarding accessibility including the Accessible Travel Guide and the Emergency Shelter Accessibility Checklist. These informational pieces provide educational information on accessibility requirements and how to include accessibility standards into the planning process.

The Connecticut Fair Housing Center also provides an informational brochure related to accessibility for people with physical disabilities. The brochure outlines reasonable accommodation requirements and landlord requirements for installing ramps and elevators. The Fair Housing Center also sponsored two trainings on visitability/accessibility. The trainings were held in 2006 and 2008, one in New Haven and the other in Hartford, and were available to surrounding local governments.

# VI. ASSESSMENT OF PROGRAMS AND ACTIVITIES

# Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) program is a versatile program providing communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG funding has become a staple funding source for the City of Meriden in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the purpose of the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken in this regard.

The City of Meriden previously conducted an Analysis of Impediments to Fair Housing (AI) in August of 1996 with updates in 2000 and 2005. This document will serve as the City's updated Analysis of Impediments in accordance with HUD regulation at 24 CFR 570.904(c)(1) for HUD CDBG Entitlement grantees. The City is committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This Analysis of Impediments will coincide with the City's 2010-2015 Consolidated Plan, which includes the City's certification of compliance with fair housing requirements.

In furthering fair housing efforts, the City has established housing and community development goals including:

- Provide affordable housing opportunities;
- Provide decent housing for special needs populations including the homeless, elderly, and homeowners with severe cost burden;
- Increase assisted housing choice; and
- Develop and viable urban community by providing a suitable living environment.

The City of Meriden continues to further fair housing efforts through its CDBG program by funding activities including code enforcement, housing rehabilitation, homeownership programs, and homeless services. The City is also dedicated to improving the livability of neighborhoods, increasing access to quality public and private facilities and services, and reducing the isolation of income groups through public service activities and public facility improvements. Neighborhood revitalization and the provision of services within a community are essential to fair housing choice and often times, lower-income areas lack the necessary services that help to provide a suitable living environment. Meriden believes that funding public service activities creates economic opportunity leading to increased self-sufficiency, increased housing opportunities, and reducing homelessness.

## **Housing Programs**

## Housing Rehabilitation

The City has made housing rehabilitation a priority in maintaining its inner-city housing stock, which is imperative to providing housing opportunities. The inner-city of Meriden contains a concentration of its oldest, multi-family residential structures and many of the property owners are low-to moderate-income experiencing cost burden. Many of the City's rental units are contained in these structures so rehabilitating the units assists in maintaining affordable housing and also allows the City to continue to offer housing opportunities for families with children or large households.

### Code Enforcement

Compliance with state and local housing codes plays a key role in maintaining an affordable housing stock within the City and in promoting neighborhood investment that can lead to increased housing opportunities. The City is dedicated to its housing code enforcement and compliance efforts and will continue to develop crucial code policies and procedures that will ensure compliance with housing codes and provide a decent and suitable living environment for residents.

## Homeownership Opportunities

The City is dedicated to promoting, developing, and expanding homeownership opportunities, reducing isolation, and increasing housing choice. Homeownership tends to create a greater sense of neighborhood investment resulting in improvement leading to stability. The City implements a downpayment assistance program for Meriden Housing Authority self-sufficient program households and/or low-and moderate-income renter households who wish to become first-time homebuyers. The City may also obtain residential structures suitable for rehabilitation and after rehabbing the structure will offer low/mod first-time homebuyer's the opportunity to purchase.

## Rental Rebate Program

State law provides a reimbursement program for Connecticut renters who are elderly or totally disabled, and whose incomes do not exceed certain limits. Persons renting an apartment or room, or living in cooperative housing or a mobile home may be eligible for this program. Renters' rebates can be up to \$900 for married couples and \$700 for single persons. State forms are available at the Meriden Senior Center.

## Public Facility/Infrastructure Improvements

The City continues to fund various street improvement projects including sidewalk improvements and road resurfacing. Infrastructure improvements such as these assist in revitalizing neighborhoods and provide for safer living environments.

## Safety and Security Improvements

Fair housing includes the opportunity for all residents to live in a decent and safe living environment. The City is dedicated to maintaining stable neighborhoods by continuing the City's Community Police Program and community policing efforts, training police personnel in community policing techniques, and continuing targeted patrols.

## **Public Service Programs**

The City of Meriden provides the following services through various public service programs funded through the CDBG program.

- Counseling services to the homeless or persons at risk of being homeless;
- Counseling services to children that are victims of domestic violence or sexual abuse;
- Access to medical appointments, jobs, meals, and other daily functions for the special needs population;
- Youth services;
- Senior services;
- Literacy training;
- Motivational training;
- Support network for overcoming poverty; and
- Employment and training services.

## Meriden Law Department

The City of Meriden's Law Department provides housing legal services when necessary in resolving housing related needs throughout the community. The Law Department works closely with the Housing and Building staff in providing legal advice to assist with the development of appropriate policies for code enforcement and other activities. The Law Department also acts as a clearinghouse for information regarding housing in Meriden. Housing services the Law Department provided from July 2008 through June 2009 include:

## Code Enforcement Activities

The Law Department worked extensively on all aspects of code enforcement activities including code drafting and interpretation and development of implementation and enforcement procedures.

## **Property Maintenance Liens**

The Department worked to file property maintenance liens on properties the City expended funds on to bring into compliance with local or state codes. Maintaining the City's current housing stock is imperative to fair housing and filing liens helps to ensure properties will be brought into some compliance with regulatory codes.

## Anti-Blight Liens

In an effort to provide suitable living environments for Meriden residents, the Law Department helped to file liens in accordance with the City's anti-blight ordinance.

## Housing Inquiries

The Law Department responded to housing inquiries from both landlords and tenants. Upon request, the department distributes pamphlets and detailed information outlining landlord and tenant rights and responsibilities and regarding the eviction procedures for the State of Connecticut. Tenant pamphlets in Spanish and English include:

- How to Keep Utility Service;
- What to do if your Landlord is going through Foreclosure; and
- Tenant's Rights in the areas of:
  - Discrimination;
  - Eviction;
  - Housing Authority Grievance process;
  - Just Cause Evictions;
  - Lockouts;

- Rent Increases;
- Repairs;
- Security Deposits; and
- Utilities.

### **Eviction Information**

The Law Department provides information on evictions and the court eviction procedures to landlords who seek information on methods of eviction and to tenants who were looking for information on how to represent and defend themselves in eviction proceedings.

## Referrals to State and Legal Services

The Law Department makes referrals to state agencies that provide assistance on housing related matters including:

- Meriden Social Services (Meriden Health Department);
- New Opportunities;
- · Meriden Housing Authority;
- CT Legal Services;
- Meriden Superior Court Services;
- Department of Social Security;
- Office of Protection and Advocacy for Persons with Disabilities;
- CT Commission on Human Rights & Opportunities;
- · Center for Disabilities Rights; and
- CT Women's Legal and Education Fund.

## Meetings and Forums

Meriden's Law Department works closely with the Human Rights Advisory Board, who is responsible for determining the conditions, needs, and problems concerning human rights in Meriden including housing issues. The Law Department helps promote seminars for neighborhoods and residents affected by the housing/mortgage crisis to provide information on available resources.

## New Opportunities, Inc.

New Opportunities, Inc. is a community action agency with a mission to improve the quality of life for economically disadvantaged individuals by providing the necessary resources to increase their standard of living, foster self improvement, maximize self empowerment and increase economic self-sufficiency. New Opportunities, Inc. administers social service programs targeted to the low-income and elderly communities. Programs and services offered through New Opportunities, Inc. include:

### Eviction and Foreclosure Prevention

This program is designed to assist low-and moderate-income persons at risk of becoming homeless as a result of being unable to afford their mortgage rates. Services offered through this program include mediation, conflict resolution, and provision of payments through a state funded rent-bank administered by the Connecticut Department of Social Services (DSS).

## Housing Opportunities for People with AIDS (HOPWA)

The HOPWA Program provides rental subsidies and case management services for individuals and families with HIV/AIDS or related disease. The target population is persons infected with HIV/AIDS and who are homeless or at risk of homelessness.

### Shelter NOW

Shelter NOW offers a Transitional Living Program and a Supportive Service program for those infected with AIDS. Emergency shelter services are provided to men, women, and women and children, who without this program, would be residing on the street. Seventy beds have been allocated for the Emergency Shelter Services.

## Meriden Supportive Housing Project

This program provides rental certificates to 3 homeless families infected/affected by HIV/AIDS at scattered site locations in Meriden. Self Sufficiency Case Managers assist the families in tenant/landlord mediation and educates the families about tenant rights and responsibilities.

## Low Income Housing Energy Assistance Program (LIHEAP)

The energy assistance program helps income-eligible people who have difficulty paying the cost of heating their home by providing vendor payments for home heating. The primary goal of this program is to keep households warm and safe during the winter months.

## Meriden Housing Authority

Connecticut Public Housing Authorities were created by the Connecticut Legislature in an effort to provide housing for low income persons. Although the Housing Authority in Meriden operates under federal and state regulations, the MHA does work closely with the City Manager and other departments within the City of Meriden in a cooperative effort to resolve housing issues for low and moderate income persons. Below is a list of public/assisted housing in the City of Meriden.

Figure 13 Public Housing

DEVELOPMENT.	UNIIS
Mills Memorial	140 family  (26) – 1 bedroom  (52) – 2 bedroom  (44) – 3 bedroom  (18) – 4 bedroom
Community Towers	221 Elderly/Disabled (220) – 1 bedroom (1) – 2 bedroom
Chamberlain Heights	Under Rehabilitation 66 Section 8 Relocation Vouchers Issued
Yale Acres	163 Family  i(119) – 2 bedroom  (44) = 3 bedroom
Johnson Farms	52 Family (52) = 2 bedrooms

<sup>\*</sup>Source: Meriden Housing Authority

## Housing Choice Voucher (Section 8) Program

The Housing Choice Voucher Rental Assistance Program provides vouchers to very low - and extremely low - income households that are in need of housing, are potentially at risk of being homeless, or have special needs. Priority renter households for Meriden's Section 8 Program are those below 50% of the area median income (AMI), with an emphasis on those below 30% AMI and experiencing severe cost burden. Rental assistance provides affordable housing opportunities which leads to families moving towards self-sufficiency. In 2010, MHA assisted 722 Housing Choice Voucher residents.

## Meriden Wallingford Chrysalis, Inc.

Chrysalis, Inc offers Bloom's Place Transitional Living Program. This program provides up to 24 months of housing for victims of domestic violence and their children whom have reached the end of their emergency shelter stay and require additional assistance before living independently.

## **Connecticut Legal Services**

Connecticut Legal Services provides legal support services to assist people at risk of being homeless access services and resources in order to stabilize their lives and strengthen their financial security. Connecticut Legal Services educates persons with limited income on the variety of programs that Connecticut offers including seven cash assistance programs, six medical access programs (including special needs programs for disabled working adults, women with breast or cervical cancer, children above Medicaid guidelines, and persons with HIV/AIDS), four major food programs, one child care assistance program, and seven programs that improve access to affordable energy and utility services.

## **Program Assessment Conclusion**

The City of Meriden is committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through its CDBG program to assist in providing housing choice. Coordination with various state and local agencies has resulted in the ability to provide a vast array of programs and services to assist in meeting housing needs throughout the community. Though the City is dedicated to increasing fair housing, lack of available funding and scarce land to develop new housing can create barriers in providing housing choice. The City will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

## VII. CONCLUSIONS AND RECOMMENDATIONS

The Department of Housing and Urban Development (HUD) requires that all recipients that receive federal funds from the Community Development Block Grant (CDBG) Program take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction.

According to HUD, 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 choice or the availability of housing choices.
- 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.

The City conducted a thorough review of current demographic data; all public sector laws, regulations, ordinances, and policies; private sector lending policies and practices; fair housing enforcement; informational programs; and visitability in Meriden. The analysis also included an assessment of the jurisdiction's fair housing programs and activities. The City consulted with local and State housing organizations and also conducted a fair housing survey which provided valuable input. Through the comprehensive review and input received from the various bureaus and agencies, the following impediments were identified.

## Impediments to Fair Housing Choice

### **IMPEDIMENT 1**

High income levels and fees requested to rent apartments limits choices for persons on fixed incomes.

#### Documentation

The fair housing survey, for the purpose of the AI, revealed rental challenges for persons on fixed incomes due to the high levels of income and fees requested to rent apartments. The median household income in 1999 was \$43,237. ACS estimates a median household income increase as of 2008 at \$56,876. According to the 2000 census 6,306 persons or 11% of Meriden's residents were living below the poverty level. Though Meriden's housing tends to be among the most affordable in the region, the 2009 Plan of Conservation and Development reveals that as of 2007, fair market rents for the New-Haven/Meriden area ranged from \$882 for a one-bedroom to \$1,457 for a four bedroom. Monthly rental rates combined with requests for security deposits or other up-front costs can prove to be burdensome for persons with fixed incomes.

#### Recommendation

- Indentify resources available to supplement rental costs for persons on fixed incomes.
- Continue to implement the Section 8 program through the Meriden Housing Authority to assist in reducing rental costs for low-and moderate-income persons and persons on fixed incomes.
- Develop an affordable housing inventory that can be used to identify available affordable rental
  units.

### **IMPEDIMENT 2**

Limited financial assistance for the elderly, low income, and disabled.

#### Documentation

The fair housing survey conducted for the AI revealed that the lack of available financial assistance for the elderly, low income, and disabled is limiting fair housing choice.

#### Recommendation

Continue efforts to collaborate with lending institutions, public service agencies, and non-profits to identify available resources and programs to assist the elderly/low-income/and disabled.

#### **IMPEDIMENT 3**

Predatory lending practices to low-and moderate-income persons.

#### Documentation

The City's percentage of subprime conventional loans ranks 83<sup>rd</sup> of 664 cities in the United States with a population of 50,000 or greater. Meriden's subprime lending rates are similar to surrounding communities but not nearly as pronounced as Hartford or Bridgeport with subprime percentages of 42.2% and 42.8% respectively. The City's 2009 Plan of Conservation and Development indicates that in 2004 32.3% of conventional home purchase mortgage loans issued in Meriden were from subprime lenders and 34.1% of refinancing loans were from subprime lenders.

- Work with HUD approved non-profit organizations to provide homeownership education courses to potential homeowners. Courses should provide information regarding how to compare home prices and the importance of inspections.
- Develop a preferred list of qualified lenders and realtors to work with perspective homebuyers.

 Make available and refer potential homeowners to federal laws designed to protect consumers in mortgage lending including the Truth in Lending Act (TILA), the Homeownership and Equity Protection Act (HOEPA), and the Real Estate Settlement Procedures Act (RESPA).

### **IMPEDIMENT 4**

### Lack of accessible housing for the disabled.

#### Documentation

The fair housing survey and review of policies and procedures at the local level revealed that persons with disabilities face a restricted housing selection. Identifying information regarding accessibility was difficult at both the local and state level.

There is insufficient numbers of accessible units to meet the demand, as 34% of Meriden's population has a disability.

When accessible units are available and advertised, it may still be leased to non-disabled tenants. The City has no requirement that public or private property owners reserve or hold open accessible units, or seek referrals from agencies that provide services to people with disabilities.

- Review taxation codes and implement tax exemptions for making adaptations to make a home more accessible for persons with disabilities.
- Implement codes regulating that all new construction of multi-family (4 units or more), coops, and conversions must meet Section 504 of the American Disabilities Act (ADA).
- Conduct an assessment of accessible housing units and buildings in the City of Meriden for the purpose of developing an inventory of accessible housing and buildings and providing that information to the public.
- Refer people to the State Office for Protection and Advocacy for Persons with Disabilities for educational information and brochures.
- Enforce current City taxation codes allowing for tax relief and abatements for the elderly and disabled.
- Work with local housing organizations to provide a wide variety of housing services, including services to the disabled.

- Meet with design specialists to require and encourage housing designs that consider the needs of the disabled.
- Provide builders and developers with information about the advantages of providing housing for this market.

### Lack of affordable owner-occupied housing.

#### Documentation

The City of Meriden's housing stock is amongst the most affordable in its region however, housing affordability is still an issue state-wide.

As of 2006, the median value of a home in the City of Meriden was \$203,000 and that price increases in 2007 to \$205,500. Though these prices are below the median sales prices of surrounding communities, which range from \$245,000 to \$344,000, the cost of housing is still unaffordable to low- and moderate income homebuyers.

According to the 2009 Plan of Conservation and Development, Meriden's housing market greatly extends beyond adjacent communities due to the ease of commuting. The scale of the surrounding and extended market combined with the housing affordability problem state-wide, market pressures to develop affordable housing with continue to exist.

- Encourage private developers to construct affordable housing.
- Determine locations for the development of affordable housing and work with local nonprofits to acquire land for affordable units.
- Continue the Homeownership Program through the Meriden Housing Authority providing homeownership opportunities to low-and moderate- income persons.
- Implement an inclusionary zoning policy aiding in the development of affordable housing.
- Continue the use of Community Development Block Grant Funds (CDBG) for housing rehabilitation activities to maintain the City's affordable housing stock.
- Work with housing organizations to continue efforts and collaborations on affordable housing and other fair housing needs.

Inadequate supply of Section 8 housing units.

#### Documentation

The fair housing survey conducted for the AI revealed the possibility that there is not a sufficient amount of Section 8 rentals/homes available in Meriden to meet the demand. Many voucher holders may not be able to find suitable housing due to the misperception that Section 8 tenants are undesirable.

The Meriden Housing Authority administers the Section 8 Housing Choice Voucher Program utilizing federal funding provided by HUD. The purpose of the Housing Choice Voucher Program is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Program objectives also include the provision of supportive services to improve recipients' employability and improve customer satisfaction. The Housing Authority currently assists 722 Housing Choice Vouchers residents, which is the current number of HCV's allocated by HUD.

#### Recommendation

- Work with landlords and large, privately-owned apartment complexes to identify misconceptions about the program and resources that will aid both tenants and landlords to match Section 8 tenants with affordable units based on fair housing criteria.
- Distribute written material to landlords, tenants, and the general public regularly through the Meriden Housing Authority and Meriden Realtors.
- Send individual letters to Section 8 landlords of multi-family properties encouraging their continued participation.

### **IMPEDIMENT 7**

Discriminatory or unethical practices by landlords.

#### Documentation

The fair housing survey conducted for the AI revealed the possibility of limited housing choice due to discriminatory or unethical practices of landlords.

- Implement landlord training programs to educate landlords on ethical rental practices and provide information on Connecticut's landlord/tenant law.
- Conduct annual fair housing trainings for landlords or refer them to the Fair Housing Center for information on fair housing laws and regulations and available trainings.

Lack of available vacant land in Meriden to build affordable housing.

#### Documentation

The fair housing survey conducted for the AI and the 2009 Plan of Conservation and Development revealed that most of Meriden's vacant land and agricultural land zoned for residential use are scattered individual sites in established neighborhoods or in small clusters located on the fringe of developed areas. This indicates that the majority of future residential development in Meriden will have to be on an in-fill basis. Meriden has continued to develop and grow in the industrial, commercial, and residential categories and undeveloped land has decreased 48% as of 2007. Much of Meriden's vacant land is located in low-density residential zones.

#### Recommendation

- Continue efforts to determine locations for the development of affordable housing units and work with local-non-profits to acquire land for affordable units.
- Utilize the analysis of land uses in the 2009 Plan of Conservation and Development and implement suggestions for developing residential units.

### **IMPEDIMENT 9**

Lack of education regarding fair housing laws.

#### Documentation

The fair housing survey conducted for the AI and outreach and discussions with the Connecticut Fair Housing Center and the Meriden Human Rights Advisory Board revealed that the lack of education regarding fair housing laws or how to submit a fair housing complaint impedes fair housing in the City of Meriden.

- Identify resources available to conduct education and outreach programs for protected classes to government, non-profits, and realtors with the intentions of raising awareness of housing discrimination violations and pertinent regulations.
- Develop fair housing brochures to be kept on site at City Hall, the public library, and other public venues.

- Publish contact information and referral information relating to fair housing in local newspapers or advertise where to obtain fair housing information through the local access channel.
- Collaborate with local housing organizations and the Fair Housing Center to provide educational outreach and fair housing trainings.

### Poor financial history of potential homebuyers.

#### **Documentation**

In 2008 (the most recent data available) there were 20 loans totaling \$3.7 million that were approved but not accepted through FHA, FSA/RHS & VA.

There were a total of 461 conventional loan applications totaling \$71 million. Of the total conventional loans 294 were originated, 37 were approved but not accepted, 82 were denied, 33 applications were withdrawn, and 15 were closed for incompleteness.

Refinancing loan applications totaled 1,878 for an amount of \$296 million. Of the total refinancing loans 707 were originated, 180 were approved and not accepted, 683 were denied, 255 were withdrawn, and 53 were closed for incompleteness.

Home improvement loan applications totaled 371 for an amount of \$19 million. There were 157 home improvement loans originated, 35 approved but not accepted, 149 denied, 22 withdrawn, and 8 closed for incompleteness.

Applications for dwellings for five or more families totaled 24 for an amount of \$16 million. Of the total loan requests, 19 loans were originated, 1 was approved but not accepted, and 4 were denied.

Review of the above data reveals that for all categories the percentage of loans denied is higher than for loans approved. Applications that were denied were largely due to debt to income ratio or credit history.

- Continue to provide public services such as motivational training, literacy skills, and employment trainings that are offered through Meriden's various programs.
- Implement financial management programs and identify resources for financial counseling and training.

• Continue to implement the Homeownership Program and Family Self-Sufficiency program to assist families with homeownership opportunities and in obtaining employment allowing lowand moderate – income persons to become self-sufficient.

### **IMPEDIMENT 11**

Zoning regulations do not recognize accessory apartments in single-family zones.

#### **Documentation**

The fair housing survey conducted for the AI, outreach to the Connecticut Fair Housing Center, and review of municipal zoning codes revealed that the current zoning regulations do not recognize accessory apartments in single-family zones.

#### Recommendation

- Review and assess current zoning regulations and modify as needed for the best interest of promoting and encouraging fair housing within the City of Meriden.
- Coordinate with the Fair Housing Center in continuing efforts to encourage fair housing opportunities in Meriden.

### **IMPEDIMENT 12**

Lack of coordination, incentives, and capacity issues at the state level make it difficult for local governments to appropriately assess and address fair housing needs given the lack of resources and expertise available.

#### Documentation

The State of Connecticut's Analysis of Impediments to Fair Housing Choice identified the following impediments demonstrating how the lack of coordination, incentives, and capacity issues at the state level makes it difficult for local governments to assess and address fair housing needs.

- Limited State funding for affordable housing development efforts;
- Limited staffing for fair housing enforcement within the Department of Economic and Community Development (DECD) including the lack of full-time fair housing staff;
- Lack of technical support for local housing partnerships and nonprofit organizations and other customers regarding the application of fair housing requirements;
- Lack of DECD monitoring and enforcement of local fair housing compliance particularly with regard to development plans, affirmative marketing plans and resident selection criteria and lack of long-term CDBG program monitoring in the area of fair housing. Note: Although DECD has begun monitoring local fair housing compliance and CDBG program monitoring in the area of fair housing, this monitoring will need to be maintained on a regular basis;

- A failure to prioritize fair housing within the allocation schemes of state housing funding including the Low Income Housing Tax Credit allocation plan;
- Insufficient pre-development funding to assist and support developers of affordable housing, particularly in communities where opposition to fair housing delays projects to the point of unfeasibility;
- Limited access to mass transportation throughout the state. Note: in 2006, the Connecticut legislature passed and the Governor signed legislation to fund a 10-year, \$2.3 billion transportation package that would fund mass transit improvements with a focus on reducing commutes and building livable communities; and
- Lack of funding for fair housing activities including fair housing testing and mobility counseling programs.

#### Recommendation

- Coordinate with state agencies including the Department of Economic and Community
  Development (DECD) and the Commission on Human Rights and Opportunities in receiving any
  updates to programmatic policies and obtaining information on new programs or incentives for
  local government fair housing efforts.
- Participate in inter-agency meetings, seminars, or technical assistance trainings offered at the state level.

### Conclusion

The City of Meriden is committed to providing fair and affordable housing opportunities for all of its residents and will continue efforts towards eliminating fair housing impediments through implementing recommended actions. The City may implement some or all recommendations to address fair housing needs and selected programs will be determined by the amount of funding available to address impediments, priority community needs, and actions that are in the best interest of Meriden residents. All information gathered during the Analysis of Impediments process as well as input received from public service agencies and residents will be considered in determining the best approach to eliminating fair housing impediments in Meriden.



# City of Meriden, Connecticut

The City of Meriden, Connecticut, as a recipient of Community Development Block Grant (CDBG) funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, has conducted an Analysis of Impediments to fair Housing Choice to assess the availability of fair housing choice within the City of Meriden. I affirm that the City of Meriden will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

Lawrence Kendzior

City Manager

5.7.10

Date

Figure B-1

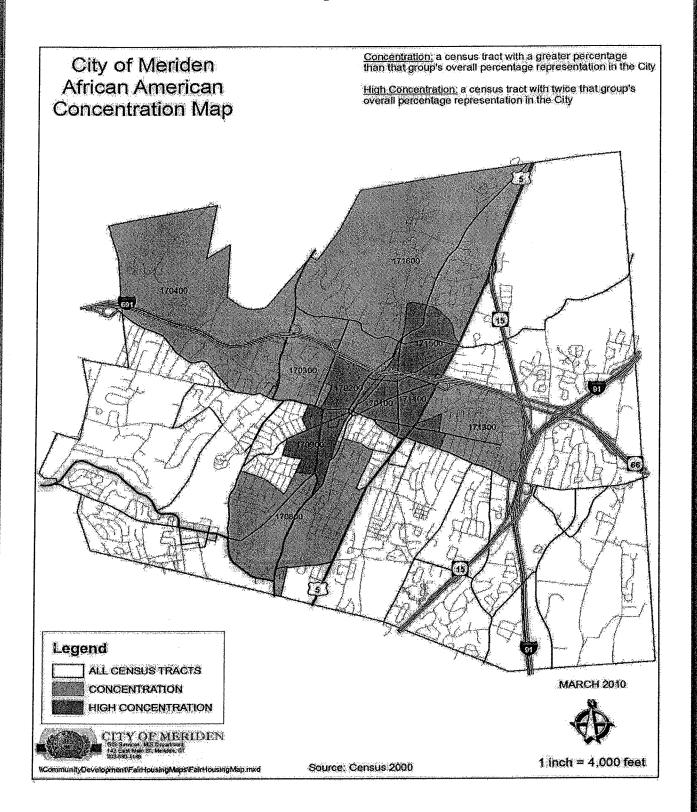


Figure B-2

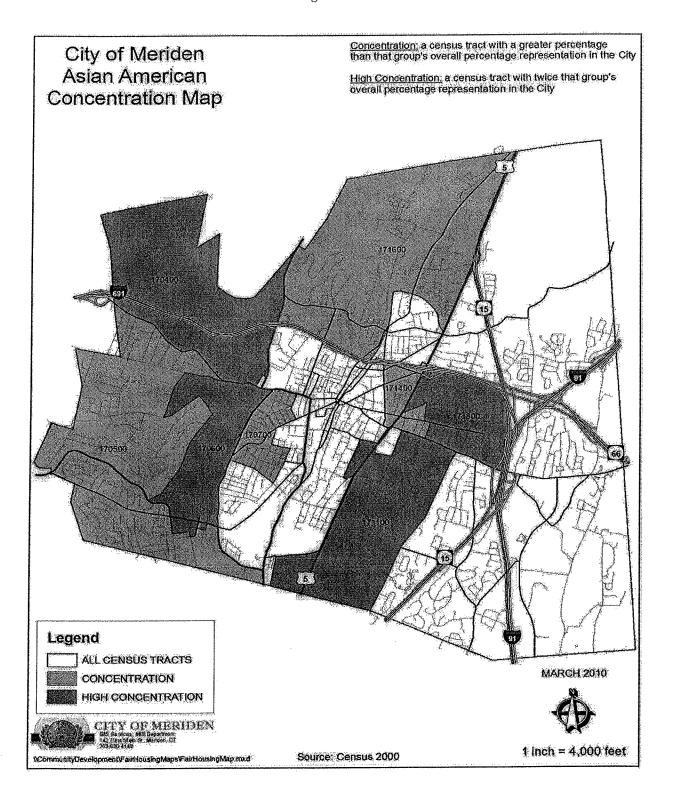
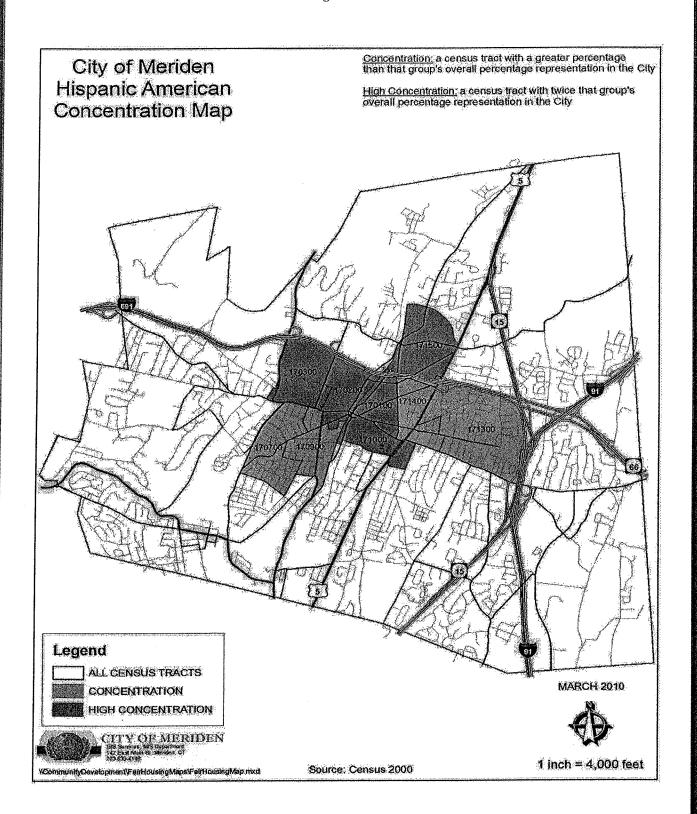
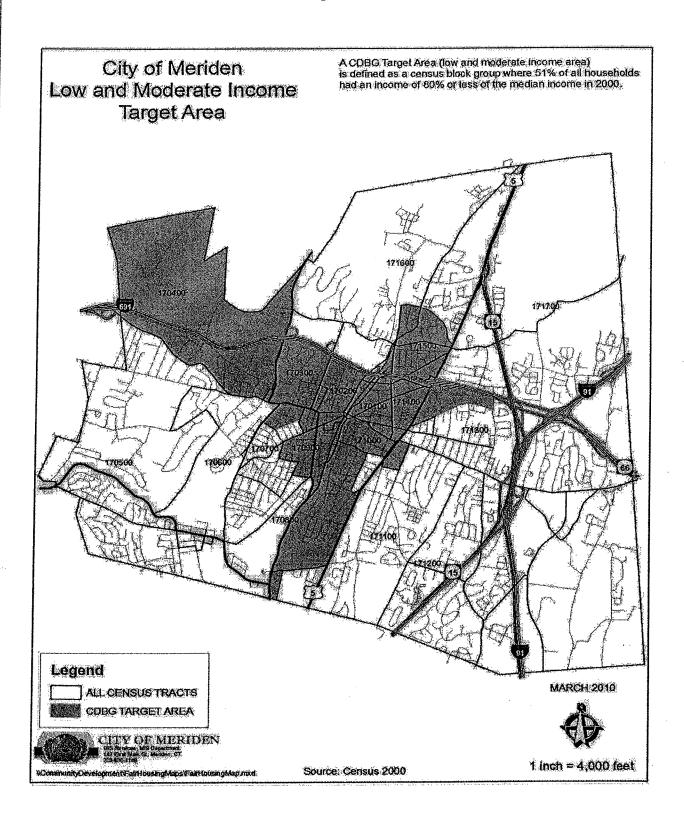


Figure B-3





# Appendix C: Home Mortgage Disclosure Act (HMDA) Data

HMDA and PMIC data is available via the HMDA website at <a href="http://www.ffiec.gov/hmda/">http://www.ffiec.gov/hmda/</a>. Tables used for the purpose of this document include the 2008 Aggregate Table 1: Disposition of Loan Applications, by Location of Property and Type of Loan and Aggregate Table 4-7: Disposition of Applications for Home Purchase, Home Improvement, or Refinancing Loans by Race, Ethnicity, Gender, and Income of Applicant. Data was collected for census tracts 1703-1717.

PMIC data was gathered utilizing the 2008 Aggregate Table 1: Disposition of Applications for Mortgage Insurance by Location of Property and Type of Loan and Aggregate Table 4-7: Disposition of Applications for Mortgage for Home Purchase or Refinancing Loans by Race, Ethnicity, Gender, and Income of Applicant. Data was collected for census tracts 1703-1717.

# Outreach List

Franciscan Life Center	Executive Director	David Swedock
267 Finch Avenue	Meriden Housing Authority	77 Oak Street
Meriden, CT 06451	22 Church Street	Meriden, CT 06450
	Meriden, CT 06451	
Executive Director	Lawrence J. Kendzior	Ray Rodriquez
Woman and Families Center	City Manager	229 Gale Avenue
169 Colony Street	A STATE OF THE STA	Meriden, CT 06450
Meriden, CT 06451		
John Hogarth	Capt. James Stephenson	So. Meriden Volunteer Fire Dept.
Senior Citizens Center	Salvation Army	31 Camp Street
22 West Main Street	St. Casimir Drive	South Meriden, CT 06451
Meriden, CT 06451	Meriden, CT 06450	
Curtis Home	Dominick Caruso	Peggy Brennan
380 Crown Street	Director of Development and	Economic Development
Meriden, CT 06450	Enforcement	Coordinator
		The state of the s
Helen Kasperovich	Warren Stephan	Esther Kimball
75 Lydale Place	207 Jepson Lane	185 Carter Avenue Ext.
Meriden, CT 06450	South Meriden, CT 06451	Meriden, CT 06451
		Application of the second of t
Immanuel Lutheran Church	Children First Initiative	Meriden/Wallingford Red Cross
164 Hanover Street	105 Miller Street	144 South Main Street
Meriden, CT 06451	P.O. Box 868	Wallingford, CT 06492
Attention: Rev. Harry Beaver	Meriden, CT 06450	

Richard Fuqua	Chief Financial Officer	Literacy Vol. of S. Central CT
Com. For People with	Community Econ Dev Funds	Meriden Public Library
Disabilities	965 East Main Street	105 Miller Street
50 Meadow Street	Meriden, CT 06450	Meriden, CT 06450
Meriden, CT 06450	The second secon	The second secon
Nial Wagner	Barbara W. Holloman	Rev. Willie Young
Jack Barry Little League	Meriden-Wallingford NAACP	Mt. Hebron Baptist Church
25 South Meadow Lane	P.O. Box 2663	84 Franklin Street
Meriden, CT 06450	Meriden, CT 06450	Meriden, CT 06450
Miller Memorial Community	Meriden Youth Wrestling	Augusta Curtis Cultural Center
360 Broad Street	c/o Glen Gitterman	Staci Roy
Meriden, CT 06450	169 Dexter Avenue	P.O. Box 4173
	Meriden, CT 06450	Meriden, CT 06450
St. Joseph School	Kashia Cave	Stanley W. Konesky, Jr.
Patricia M. Ritare	My City Kitchen	CT Police Academy – POST
159 West Main Street	P. O. Box 176	285 Preston Avenue
Meriden, CT 06451	Meriden, CT 06450	Meriden, CT 06450
St. Stanislaus Church	Robert Bass, Director	Meriden/Wallingford United Way
82 Akron Street	Public Works	35 Pleasant Street
Meriden, CT 06450		Meriden, CT 06450
Mr. John Benigni	Student Learning Center	Human Rights Office
YMCA	29 Village Lane	Debby Moore
West Main Street	Wallingford, CT 06492	
Meriden, CT 06451		

Dept of Health/Human Services	Shelter NOW	Beth Vumbaco
Denise Keating/Youth Services	43 Casimir Drive	Department of Health
Miller Street	Meriden, CT 06450	Meriden, CT 06450
Meriden, CT 06450		
Officer Tom Cirillo	American Heart Association	The Bradley Home/Jodie Schmidt
Meriden Police Department	Pat Katon	320 Colony Street
50 West Main Street	5 Brookside Drive	P.O. Box 886
Meriden, CT 06451	P.O. Box 5022	Meriden, CT 06451
Rushford Center	Magali Kupfer	City of Meriden
883 Paddock Avenue	Casa Boricua	Corporation Counsel
Meriden, CT 06450	204 Colony Street	Michael D. Quinn, Esq.
	Meriden, CT 06451	
MEDCO	Meriden Substance Abuse	Kuhn Employ. Opportunities
c/o Larry McGoldrick	Council	1630 North Colony Road
Castle Bank	5 Brookside Drive	P.O. Box 941
P.O. Box 903	Wallingford, CT 06492	Meriden, CT 06450
Parks and Recreation	Community Health Center	Easter Seals Rehabilitation
Department	134 State Street	Center
Mr. Mark Zebora	Meriden, CT 06450	158 State Street
		Meriden, CT 06450
High Hopes, Inc.	Meriden/Wallingford Chrysalis	Bernice Shelberg.
44 Woodlawn Terrace	5 Colony Street	Solomon Goffe House
Meriden, CT 06450	Suite 302	513 High Hill Road
	Meriden, CT 06451	Meriden, CT 06450

Arts & Crafts Association		Meriden Parking Commission		Louise Butcher		
53 Colony Street		City Hall		American Diabetes Association		
Meriden, CT 06451				306 Industrial Park Rd, Suite 105		
				Middletown, CT 06457		
Catholic Family Services		Superintendent of Schools		Neighborhood Preservation		
61 Colony Street		Meriden Board of Education		City Hall		
Meriden, CT 06451		22 Liberty Street				
		Meriden, CT 06450				
Child Guidance Clinic		Dept. of Social Services		Meriden Public Library		
117 Lincoln Street		Miller Street		Miller Street		
Meriden, CT 06451		Meriden, CT 06450		Meriden, CT 06450		
Andrews Homestead		Chief Jeffry Cossette		Ken Tripp		
424 West Main Street		Meriden Police Department		The Salvation Army		
Meriden, CT 06451		50 West Main Street		855 Asylum Avenue		
		Meriden, CT 06451		Hartford, CT 06105		
Mary Mushinsky		Retired and Senior Volunteer		ARC of Meriden		
Quinnipiac River Watershed		Program of Greater New Britain		200 Research Parkway		
Assoc.		147 West Main Street		Meriden, CT 06450		
P. O. Box 2825		P.O. Box 578				
Meriden, CT 06450-1825		New Britain, CT 06050-9578				
Family Services of CT		Housing Code Division		WFC Sexual Assault Crisis Service		
5 Colony Street		City Hall		169 Colony Street		
Meriden, CT 06451				Meriden, CT 06451		

Colleen Cyr	Meriden Chamber of Commerce	Fire Marshal's Office
100 Edge Hill Road	5 Colony Street	City Hall
Meriden, CT 06451	Meriden, CT 06451	
	And the second s	
Meriden Visiting Nurses Assoc.	Michelle Bourdeau	CAGM of Meriden
3 Research Parkway	Girls, Inc.	74 Cambridge Street
Second Floor	130 Lincoln Street	Meriden, CT 06450
Meriden, CT 06450	Meriden, CT 06451	
Meriden Wallingford Day Care	Donald Maleto	Lynn Faria
Women and Families Center	Boys & Girls Club	MidState Medical Center
169 Colony Street	15 Lincoln Street	435 Lewis Avenue
Meriden, CT 06451	Meriden, CT 06451	Meriden, CT 06451
James Trainor	Meriden Soup Kitchen, Inc.	Building Department
Fire Chief	P.O. Box 2138	City Hall
Meriden Fire Department	Meriden, CT 06450	
AND	Attention: Irene Traceski	
Nutmeg Big Brothers/Big	Ms. Toni Hirst	Meriden Business &
Sisters	N.O.W.	Learning Center
30 Laurel Street	232 North Elm Street	500 Broad Street
Suite 3	Waterbury, CT 06702	Meriden, CT 06450
Hartford, CT 06106-1377		Approximation of the second of
-Meriden Day Care	Mr. Larry Pelletier	Civil Air Patrol
66 Crown Street	Beat the Street, Inc.	Major Janice Mihalak
Meriden, CT 06451	41 Marshall Road	518 Hobart Street
	Meriden, CT 06450	Southington, CT 06489

John M. Gopoian	Trenton Wright		Lewis A. Slotnick
Hunter's Ambulance Service	Middlesex Community College		ULA
450 West Main Street	100 Training Hill Road		100 Riverview Center, Suite 270
Meriden, CT 06451	Middletown, CT 06457		Middletown, CT 06457
John J. Nerden R.T.C. Camp,	Star Multi-Cultural Family Center,		Linda Ball
Inc.	Inc.		20 Hayes Street
Laurie J. Russell, President	Mrs. Celeste Wright		Meriden, CT 06451
P.O. Box 2617	51 Apple Tree Hill Road, Suite B		
Meriden, CT 06450	New Britain, CT 06053		
Tony Gianakos	Director		Human Rights Advisory Board
American Legion	MidState Medical Center		c/o Roland Cockfield, Chairman
835 Hanover Street	435 Lewis Avenue		50 Rockledge Drive
Meriden, CT 06451	Meriden, CT 06451		Meriden, CT 06450
Walter Shamock	Dante Bartolomeo		Michael Rohde
City Council	City Council		Mayor
Hilda Santiago	Tony Tomassetti		Trevor Thorpe
City Council	City Council		City Council.
	All prints of the control of the con		
John Thorp	Matthew C. Dominello		Bob Williams, Jr.
City Council	City Council		City Council
		l	

Dan Brunet	Keith Gordon	Brian Daniels
City Council	City Council	City Council
George McGoldrick		
City Council		
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# Fair Housing Survey

### City of Meriden Fair Housing Survey

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), the City of Meriden is required to conduct an Analysis of Impediments to Fair Housing Choice. The City supports fair housing and encourages citizen participation in identifying impediments to fair housing within the community. Please take approximately 5 minutes to complete the following survey being conducted by the City of Meriden utilizing its 2009 Community Development Block Grant (CDBG) funds. Information provided will allow the City to continue efforts to improve fair housing throughout the community. Thank you for your time.

#### **Special Needs Populations**

Please answer the following questions regarding fair housing for persons with special needs.						
1. Is	1. Is there sufficient housing in Meriden for persons with disabilities?					
	Yes		No		Do Not Know	
2. Is	there sufficient housing in M	eride	n for low to moderate income	pers	ons?	
	Yes	Ø	No		Do Not Know	
3. Is	there adequate supply of Sec	tion	8 rentals/homes available in M	eride	en?	
	Yes		No		Do Not Know	
4. Is	there sufficient housing in Me	eride	n for the elderly?			
	Yes		No	C	Do Not Know	
Trar	sportation					
Please answer the following questions to help identify relationships between transportation, employment, and housing.						
1. Does public transportation in Meriden lead to major employers?						
	Yes		No		Do Not Know	
. Is public transportation in Meriden accessible to residential neighborhoods?						

Yes	No No	Do Not Know				
Fair Housing Compla	aints					
Please describe the number and types of complaints alleging housing discrimination that your organization has received (skip question if not associated with a public service organization).						
1. Please list the number of discrimination complaints your organization has received for each category.						
Racial						
Disability						
Religious						
Gender						
Age						
Families with		Annual Control of the				
Children		an major y protessor anni in the dispersion of				
Other						
2. Please list the num	nber of times your organization ha	s received a complaint citing discriminatory				
practice for each cate	egory.					
Conditions of Sale or	Resale					
Refusal to Rent						
Reasonable Accommodation/Relo	ocation					
3. Please list the number of fair housing complaints successfully resolved or referred to HUD.						
Resolved						
Referred to HUD						

Referred to other organization							
Fair Housing Impediments							
Please check all impediments to fair housing that are applicable to the City of Meriden. Describe any other impediments to fair housing that may exist or check the appropriate box if you feel there are no impediments to fair housing.							
1. Please identify the areas you fe	el are impediments to fair housing	in the City of Meriden.					
Accessibility Barriers (sidewalks/infrastructure etc.)  Availability of Affordable Owner-Occupied Housing  Building or Zoning Code Provisions  High Income Levels and Fees Required to Rent Apartments Limits Choice for Persons on Fixed Incomes	Lack of Education and Outreach Regarding Fair Housing Law  Lack of Vacant Land for New Construction of Affordable Housing  Landlords Discriminatory or Unethical Practices  Limited Financial Assistance for Elderly/Low Income/Disabled	Poor Financial History of					
Inadequate Supply of Disabled Housing	Locations of Banking Institutions and Real Estate Office	S					
Other (please specify)							

<u>New/Improved Housing:</u> The highest ranked priority need was "single family housing," with an average score of 2.97 and a mode of 3.0. Other high priority needs indicated were "homeless emergency shelter" with a 2.94 average and a mode of 3.0, and "homeless transitional housing" with a 2.88 average and a mode of 4.0. The lowest priority was "historic preservation assistance," with an average score of 2.0 and a mode of 2.0. Other low priority needs included "multifamily housing," with a 2.37 average and a mode of 2.0, and "residential rehab – rental units" with a 2.52 average and a mode of 2.0.

Analysis of Impediments to Fair Housing: For this portion of the survey, a four point scale was used to rank level of concern—with 1 being the least level and four being the highest level of concern. This portion of the survey comprised three subcategories: basis of housing discrimination, role in housing discrimination and other impediments to fair housing choice. A summary for each subcategory is presented below:

Basis for Housing Discrimination: When asked what participants considered to be the reason for housing discrimination, the response with the highest average score was "disability" with an a 2.9 average and a mode of 3.0. Other reasons that had high average scores included "level/source of household income," with a 2.8 average and a mode of 4.0, and "race" with a 2.77 average and a mode of 4.0. The basis of housing discrimination given the lowest score was "gender," with an average of 2.13 and a mode of 1.0. Other reasons for housing discrimination with low scores included "religion," with a 2.19 average and a mode of 1.0, and "age" with a 2.26 average and a mode of 2.0. Participants indicated other areas of housing discrimination including: "smoking/use of tobacco," "background check for sex offender status" and "domestic violence incited eviction."

Who Plays a Role in Housing Discrimination: This category asked participants who plays the largest role in housing discrimination. The highest average score was "landlord," with an average of 3.39 and a mode of 4. The lowest average score was "developer" with an average of 2.31 and a mode of 2. Participants indicated other agents of housing discrimination: "POCD seeks to increase high income housing" and "programs offering assistance."

Other Impediments to Fair Housing Choice: This category asked participants about other impediments to fair housing choice. The response with the highest average score was "predatory lending practices," with an average of 3.07 and a mode of 3.0. The response with the lowest score was "local zoning laws," with an average of 2.29 and a mode of 2.0. One participant indicated "no first time homebuyer program."