



Analysis of Impediment to Fair Housing An Update to the 2010 Analysis of Impediments

City of Norwalk
January 2015

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I) INTRODUCTION

PURPOSE OF REPORT

The Civil Rights Act of 1968, Title VIII, commonly known as the Fair Housing Act of 1968 (42 U.S.C. §3601 *et seq.*) states that it is the policy of the United States to provide for fair housing throughout the country and the Act prohibits any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including or otherwise making unavailable or denying a dwelling to any person because of race, color, religion, sex, national origin, handicap, or familial status.

Nationally, fair housing and impediments to fair housing are monitored by the United States Department of Housing and Urban Development (HUD). HUD mandates fair housing planning through Community Block Development Grant (CDBG) program requirements.

Each grantee that receives CDBG funding under Title I of the Housing and Community Development Act is required to further fair housing and fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction. The grantee will also take appropriate actions to overcome the effects of any impediments identified and will maintain records, which reflect the analysis and actions taken in this regard.

The State of Connecticut, through the Connecticut Human Rights and Opportunities Act (commonly referred to as the Connecticut Discriminatory Housing Practices Act, 46a C.G.S. §51 *et seq.*), echoes this goal and expands the protected classes to include: race/color, national origin/ancestry; sex; creed; physical, mental or learning disability; familial status (families with children, pregnant persons, and those seeking legal custody of a child); marital status; age; lawful source of income; sexual orientation.

Local law (Norwalk City Ordinance §59A-1 *et seq.*) also prohibits housing discrimination — local protected classes are: race, color, religious creed, sex, age, national origin, marital status, ancestry, sexual orientation, lawful source of income, familial status, or mental or physical disability including but not limited to blindness. The City of Norwalk supports the provision of fair housing for residents in all of the protected classes. The City has used a portion of its CDBG funding to support housing available to all low- and moderate-income households in Norwalk.

HUD's fundamental fair housing goal is to make housing choice a reality through fair housing planning. Entitlement communities, regional districts and State CDBG recipients are required to:

- Prepare an Analysis of Impediments to Fair Housing Choice (AI);
- Act to eliminate identified impediments; and
- Maintain fair housing records.

With this report the City assesses the nature and extent of fair housing concerns, and the impediments to fair housing choice and recommended actions to overcome those impediments.

The City, through the Norwalk Redevelopment Agency (Agency) undertook a comprehensive Analysis of Impediments (AI) in 2010. In 2014, the work in this updated AI was completed by Dan Cahill and Associates (DCA), a firm retained by the Agency. That work was funded through the Community Development Block Grant.

In this year, 2014, fair housing planning is undergoing change. The guide to this work is the Fair Housing Planning Guide (2 volumes), published by the U.S. Department of Housing and Urban Development in the early 1990s. The City of Norwalk recognizes its responsibility to update the Analysis of Impediments at the beginning of the new Consolidated Plan to reflect the current fair housing situation in the City and has completed this AI Update, using the Fair Housing Planning Guide.

Currently under discussion is another approach to fair housing planning, embracing concepts of geographic opportunity. The current, longstanding approach to fair housing planning has worked to overcome specific patterns of actions and policies that are discriminatory toward protected classes. These actions and policies can also create disparate impact for protected classes, where apparently neutral policies have the effect of excluding persons in protected classes. Together these actions and policies are considered impediments and thus the generic title, Analysis of Impediments to Fair Housing. The fair housing planning orientation to geographic, places of opportunity focuses first on opportunity mapping. This analysis typically qualifies neighborhoods within census tracts by the kinds of opportunities presented to residents with quality of life indicators such as: crime and safety, educational opportunities at the local school level, health care and sustainable employment. The second focus is on outcomes: how to improve those neighborhoods with low opportunity and open access to neighborhoods of high opportunity. This AI recognizes the initial steps for new fair housing planning and has included opportunity maps in the analysis.

METHODOLOGY

The methodology for the update to the A/I had four primary elements:

Public meetings and focus groups:

- A focus group for Haitians was held at the South Norwalk Community Center on September 22, 2014. The group was hosted by the Center and conducted in Creole.
- A focus group for Hispanics was held at the South Norwalk Community Center on September 22, 2014. This meeting was facilitated in Spanish.
- A focus group for persons with disabilities was held at STAR, a non-profit working with persons with disabilities on September 23, 2014.
- A public meeting was held at Norwalk City Hall on September 23, 2014

Review of relevant data including:

- The U.S. Census. City of Norwalk includes Census Tracts 0425.00 through 0446.00
- The eCon Planning Suite, published by the U.S. Department of Housing and Urban Development (HUD).

Research of relevant records including fair housing complaints, including those filed at:

- Norwalk Fair Housing Advisory Commission
- The Connecticut Commission on Human Rights and Opportunities
- U.S. Department of Housing and Urban Development

Consultations. To update the A/I, DCA completed consultations with numerous parties including:

- Leaders and Staff of non-profit organizations
- Government officials
- Real estate professionals
- Home Mortgage professionals

This analysis was specifically designed to identify impediments in the delivery of housing services through the public and private sector in the City of Norwalk. The fundamental goal of fair housing policy is to overcome these impediments and make housing choice a reality.

II) COMMUNITY PROFILE

The City of Norwalk is committed to the concept that all people are treated free from illegal discrimination in the rental, sale, or occupancy of housing. This section examines the population, housing, and special needs characteristics and trends in the City that may affect equal housing opportunity. Data from the 2010 AI is updated throughout the section. The principal sources of updated data are from the U.S. Census, directly from the American Community Survey (ACS); the eCon Planning Suite data provided by HUD to Norwalk; Johnson Controls, Inc., a firm that completed a housing study for Norwalk.

For instance for the first two charts, the 2008 – 2012 data is used from the American Community Survey (ACS) since it offers the most reliable data from surveys taken over an extended period of time. The eCon Planning Suite data includes iterations of the ACS and is designed to help Norwalk better understand community needs in its Consolidated Plan for 2015 – 2019, which will be published in the second quarter of 2015. Some discrepancies occur with data from different sources, or even within data sources like the eCon Planning Suite. However, the data “pictures” help to give a working profile of Norwalk.

BACKGROUND

The City of Norwalk, Connecticut, is a diverse community located approximately 45 miles north of New York City. Norwalk is located along Long Island Sound at the mouth of the Norwalk River and has a land area of nearly 22 square miles. Both Interstate 95 and the Merritt River Parkway cross the City. Commuter rail service connects the City to New York City, Stamford, Bridgeport, and New Haven. Because of its location, Norwalk has developed as a diverse community from both a cultural and an economic standpoint.

Norwalk's diverse economy supports not only a wide range of industries, but also a wide range of occupational titles requiring varying levels of skill, training, and education. This economy affects the city in several ways. First, the diversity of industry is reflected in a broad range of land uses. In many areas of the City, one can find higher density residential development and industrial or commercial development existing side by side. The location of industrial or commercial uses near residential neighborhoods has an impact on both the allowable density of residential development and on actual and relative land value.

Second, the mix of industries within the City attracts other businesses and industry. As business and industry expands in Norwalk, employment opportunities rise and directly influence the need for housing. The resulting need for housing places upward pressure on housing costs within the rental and ownership markets.

Finally, the broad range of occupational titles found within Norwalk's labor market is reflected in individual income levels citywide. Norwalk is a community that is home to highly skilled professional persons earning well over the metropolitan statistical area's median income. Norwalk is also home to persons working in entry-level retail and service jobs paying minimum

wage. With income levels clustered at the edges of the income continuum, a skewed relationship is created between housing prices and ability to pay.

From the standpoint of cultural diversity, these economic trends in combination with Norwalk's proximity to New York City and its relative affordability have helped Norwalk develop into a racially and ethnically mixed community.

DEMOGRAPHIC DATA

Population

Like many cities in the Northeast, Norwalk has seen only modest population growth in the past several decades:

Norwalk Population Trends, 1980 - 2012

Year	Population	% Change
1980	77,767	
1990	78,331	1.0%
2000	82,951	6.0%
2012	85,145	2.6%

*Source: US Census Decennial Census and American Community Survey 2012 5-year;
Table DP05 Demographic and Housing Estimates*

Race and Ethnicity

As seen in the table below, Norwalk's population is diverse, generally reflecting the race and ethnic profile of State of Connecticut.

Norwalk Racial Characteristics, 2008 - 2012

Race	People	% of Total
All (Total Population)	85,145	100
One Race	83,630	97.4
White	64,401	75
Black/African American	11,042	12.9
American Indian	174	0.2
Asian	3,855	4.5
Hawaiian/Pacific Islander	75	0.1
Other Race	4,083	4.8
Two or More Races	2,223	2.6
Hispanic (Any Race)	17,966	20.9

*Source: US Census, American Community Survey 2012 5-year;
Table DP05 Demographic and Housing Estimates*

The Hispanic population is the largest minority group above, with many households within that group coming from Mexico and other parts of Latin America. The American Community Survey (ACS) also gives information on the reliability of data for each segment of its reports. The ACS takes a sampling, not a 100% tabulation. So, the ACS posts an indication of the

“margin of error”. Often this margin has a greater impact on smaller populations. For instance, for the Hispanic or Latino population above, the margin is +/- 1,276.

The following is a list of census tracts with concentrations of racial or ethnic groups. The HUD definition of an area of minority concentration is a census tract in which the population of any racial/ethnic minority group exceeds 50% of the total population of that tract. A high concentration is defined as a census tract in which the population of any racial/ethnic minority group is 75% or more of the total population of that tract.

Norwalk Minority Concentration by Census Tract

Norwalk Census Tract	% Minority 2012 Estimate
432	61.20%
434	54.10%
437	74.10%
440	66.70%
441	65.50%
444	66.60%
445	89.20%

*Source: American Community Survey 2012 5-year;
Table DP05 Demographic and Housing Estimates*

These tracts are concentrated in the urban core of the City, along the Norwalk River and on either side of Interstate 95. Appendix 2 includes a map showing minority concentration by Census Tract.

Language

The data below was compiled in 2012 in order to complete a “Four Factor Analysis” which served as the guide for determining which language assistance measures the City would undertake to guarantee meaningful access to the City’s services and programs, including the Community Development Block Grant program. Persons with Limited English Proficiency (LEP) were defined to speak English “less than very well.” The Analysis led to a Language Assistance Plan (LAP) implemented in 2013 throughout City government.

Limited English Proficiency Persons in Norwalk

	Language Spoken	Estimated Number of LEP Persons	Margin of Error	Percentage of Total City Population
1.	Spanish	8,144	+/-925	10.6%
2.	Greek	645	+/-221	0.8%
3.	Italian	488	+/-159	0.6%
4.	French	386	+/-228	0.5%
5.	French Creole	284	+/-150	0.4%
6.	Polish	270	+/-138	0.4%
7.	Chinese	250	+/-105	0.3%
8.	Gujarati	96	+/-59	0.1%

Source: American Community Survey 2005 - 2008

Disability

The U.S. Census Bureau definition of disability will be used for this analysis, as that is the source for the available data. The Bureau defines disability as a long-lasting physical, mental, or emotional condition, which can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. Such conditions can also impede a person from being able to go outside the home alone or to work at a job or business.

The profile of people with disabilities in Norwalk generally follows that of the State of Connecticut and the U.S., increasing with age. As shown below, the 32.50% of those over 64 years of age have a disability with the highest rate (20.40%) having an ambulatory disability.

Individuals with Disabilities in Norwalk

	Number with a disability	Percent with a disability
Total population	8,416	9.90%
Population under 5 years	66	1.30%
With a hearing difficulty	0	0.00%
With a vision difficulty	66	1.30%
Population 5 to 17 years	522	4.60%
With a hearing difficulty	101	0.90%
With a vision difficulty	13	0.90%
With a cognitive difficulty	367	3.30%
With an ambulatory difficulty	14	0.10%
With a self-care difficulty	41	0.40%
Population 18 to 64 years	4,030	7.00%
With a hearing difficulty	965	1.70%
With a vision difficulty	1,007	1.80%
With a cognitive difficulty	1,465	2.60%
With an ambulatory difficulty	1,947	3.40%
With a self-care difficulty	750	1.30%
With an independent living difficulty	1,515	2.60%
Population 65 years and over	3,798	32.50%
With a hearing difficulty	1,688	14.40%
With a vision difficulty	816	7.00%
With a cognitive difficulty	861	7.40%
With an ambulatory difficulty	2,386	20.40%
With a self-care difficulty	870	7.40%
With an independent living difficulty	1,838	15.70%
<i>Source: ACS 2008 - 2012</i>		

Norwalk's population of people with disabilities is generally dispersed in Census Tracts throughout the City. Census Tracts 434, 440, 441 and 445 have the highest percentage of persons with disabilities at 14.9%, 14.9%, 16.2% and 15.5% respectively. The map showing the locations of people with disabilities by census tract is in Appendix 2.

Individuals with Disabilities by Census Tract

Census Tract	% of Individuals ≥ 5 years w/a Disability
425	7.50%
426	10.20%
427	8.30%
428	9.60%
429	8.20%
430	9.00%
431	8.10%
432	8.00%
433	10.10%
434	14.90%
435	8.90%
436	12.60%
437	8.40%
438	9.20%
439	7.70%
440	14.90%
441	16.20%
442	11.70%
443	7.00%
444	6.20%
445	15.50%
446	5.00%

*Source: American Community Survey 2012
5-year; Table S1810 Disability Characteristics*

Household Formation

Over the past three decades, household size has been declining in the United States and throughout Connecticut. Two principal reasons most often cited for this decline is the smaller family size with fewer children and the delay in marriage age for newlyweds. Johnson Controls, Inc. (JCI) completed a housing study for Norwalk in 2014. JCI showed that Norwalk household size has increased since 2010 with an average household size of 2.15 in that year increasing to 2.58 in 2014. JCI attributes part of this ‘counter’ trend to a younger population (born in early 1980s to 2000s) returning home to live with parents. This younger population is often burdened with debt and experiencing fewer job opportunities because of the recession. Also, JCI indicates that a larger percentage of seniors (26.4%) in Western Fairfield County are living with their children primarily because of the lack of quality senior and assisted living facilities.

Households and Income

HUD has established five income categories for their analysis. HUD uses the acronym of HAMFI for HUD Area Median Family Income. As noted above, some discrepancies occur with data from different sources. The five income ranges are:

- Extremely Low (0-30% of HAMFI)
- Very Low-income (31-50% of HAMFI)
- Low-income (51-80% of HAMFI)
- Moderate-income (81-95% of HAMFI)
- Upper-income (95% and above of HAMFI)

Household Income as Percentage of HUD Area Median Family Income

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	6,190	5,425	4,535	4,355	15,955
Small Family Households *	1,570	1,745	1,740	1,665	8,140
Large Family Households *	210	380	260	370	1,000
Household contains at least one person 62-74 years of age	1,000	1,015	865	1,015	2,750
Household contains at least one person age 75 or older	1,430	960	450	235	940
Households with one or more children 6 years old or younger *	815	735	670	525	1,060
* the highest income category for these family types is >80% HAMFI					
Source: eCon Planning Suite: 2007-2011 CHAS					

ECONOMIC DATA

Occupations

According to the U.S. Bureau of Labor Statistics, the unemployment rate for the City of Norwalk was 5.4% in July, 2014. This compared to the national unemployment rate of over 6 percent.

The following data from the Connecticut Department of Labor is for the Bridgeport-Stamford area, which includes the City of Norwalk. Labor market areas are metropolitan areas, micropolitan areas, or small labor market areas. They exhaust the geography of all States, the District of Columbia, and Puerto Rico, with the exceptions of Kalawao County, Hawaii, and 18 isolated minor civil divisions (MCDs) in New England. The Office of Management and Budget (OMB) is responsible for defining the metropolitan and micropolitan areas, while the Bureau of Labor Statistics' Division of Local Area Unemployment Statistics (LAUS) performs this function for small labor market areas. The metropolitan, micropolitan, and small labor market area definitions contained in this directory were introduced with labor force estimates for January 2005. The previous major revision of labor market area definitions was implemented in 1994.

Labor market area definitions are updated on an annual basis, and changes to area definitions

and titles are introduced with the labor force estimates for the following January. In order to maintain a consistent time series, data for labor market areas generally are reconstructed back to January 1990 or as far back as practicable.

Workforce in Bridgeport-Stamford, including City of Norwalk

NAICS Code	Industry	LMA*			State of Connecticut		
		Worksites	Employment	Average Quarterly Wage	Worksites	Employment	Average Quarterly Wage
11	Agriculture, forestry, fishing and hunting	49	430	\$9,082	375	4,538	\$76,58-\$16,499
21	Mining	0	0	0	58	569	\$18,373
22	Utilities	62	1,622	\$19,695-\$24,176	238	8,172	\$27,092-\$19,378
23	Construction	2,419	11,818	\$17,097	9,395	57,870	\$15,238-\$16,308
31-33	Manufacturing	1,018	33,568	\$24,970	4,649	163,267	\$20,095-\$21,439
42	Wholesale trade	2,475	13,784	\$29,842	149	6,081	\$27,092
44-45	Retail trade	3,444	50,946	\$9,557	12,818	194,263	\$6,921-\$7,961
48-49	Transportation and warehousing	521	9,358	\$13,677-\$16,448	2,195	52,351	\$12,153-\$18,752
51	Information	700	13,044	\$7,780-\$26,528	2,068	35,144	\$7,644-\$22,945
52	Finance and insurance	2,741	35,470	\$22,786-\$63,287	7,041	110,302	\$23,482-\$37,543
53	Real estate and rental and leasing	1,148	6,630	\$13,308-\$25,254	3,521	19,711	\$3,662-\$17,008
54	Professional and technical services	4,523	29,900	\$20,402-\$30,117	13,353	92,063	\$19,237-\$25,444
55	Management of companies and enterprise	405	12,675	\$53,764	958	30,764	\$38,982
56	Administrative and waste management	2,260	24,602	\$12,801-\$14,660	7,429	86,533	\$10,854-\$13,100
61	Education services	590	37,538	\$12,898-\$15,096	1,927	177,840	\$13,473-\$18,549
62	Health care and social assistance	2,845	62,411	\$12,171-\$18,102	10,617	280,058	\$9,667-\$19,080
71	Arts, entertainment, and recreation	650	10,814	\$8,004-\$15,479	1,960	43,715	\$5,205-\$14,963
72	Accommodation and food services	2,238	30,495	\$5,632	8,273	122,390	\$4,394-\$4,924
81	Other services	5,205	17,612	\$8,819-\$10,793	14,685	59,212	\$5,456-\$14,586
99	Nonclassifiable establishments	130	142	\$23,097	488	569	\$19,281
92	Public Administration	304	9,876	\$18,061-\$23,097	1,768	58,297	\$16,350-\$18,869
	Total	38,044	415,901	\$21,201	113,697	1,661,278	\$16,095

*Labor Market Area (LMA) - Bridgeport=Stamford (Includes City of Norwalk)

Source: Department of Labor (<http://ww1.ctdol.state.ct.us/lmi/regional.asp>) 2013 Quarter 4

The following categories were higher for the Labor Market Area (LMA) including Norwalk, than the State: wholesale trade (+2.9%), professional and technical services (+1.7%), and management of companies (+1.2%).

HOUSING DATA

This section provides an overview of the housing market in Norwalk. The following subsections provide a current housing inventory (supply) and housing market (demand) overview of the City. The housing inventory includes an assessment of the City's total housing supply by type,

tenure, occupancy status, condition, and change in composition from 2000 to 2008. The housing market overview provides an assessment of current housing demand in the City based on tenure and household income.

Housing Inventory

According to ACS figures, the City's total housing inventory in 2011 was 38,944 units. While detached, single family homes comprise nearly half of the City's inventory, the City has a great diversity of housing types; 12% of all housing units are in buildings that have 20 or more units.

Residential Properties by Unit Number

Property Type	Number	%
1-unit detached structure	19,189	49%
1-unit, attached structure	1,758	5%
2-4 units	7,604	20%
5-19 units	5,753	15%
20 or more units	4,595	12%
Mobile Home, boat, RV, van, etc	45	0%
Total	38,944	100%

Source: eCon Planning Suite: 2007-2011 ACS

Tenure

Comparing different tables in the eCon Planning Suite reveals statistical inconsistencies, such as the total number of units in each of these tables. Nonetheless, the tenure table gives a picture of Norwalk households with 64% in the owner category.

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	132	1%	562	4%
1 bedroom	1,913	8%	5,804	46%
2 bedrooms	5,702	24%	4,253	33%
3 or more bedrooms	15,980	67%	2,117	17%
Total	23,727	100%	12,736	100%

Source: eCon Planning Suite, 2007-2011 ACS

Age and Condition

The age of housing in Norwalk presents three major issues relating to the condition of housing: the potential presence of lead hazards; housing, health, and building code deficiencies; and general environmental hazards. First, the large number (28,800) of units constructed prior to 1980 signifies that lead-based paint hazards may present a significant public health problem for children, and in particular, young children living in older, poorly maintained homes. In 1979, lead based paint was banned in the United States. Significant concentrations of older houses, many of which are renter-occupied two-family or multi-family structures, are located within six Census Tracts (Tracts 442, 434, 441, 446, 445 and 444). As noted in the "Risk of Lead-Based

Paint Hazard” table below, a significant number of owner- and renter-occupied units built before 1980 have children residing (945) in them.

Year Unit Built				
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,173	5%	664	5%
1980-1999	3,520	15%	2,306	18%
1950-1979	11,944	50%	5,539	43%
Before 1950	7,090	30%	4,227	33%
Total	23,727	100%	12,736	99%

Source: eCon Planning Suite: 2007-2011 ACS

Risk of Lead-Based Paint Hazard				
Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	19,034	80%	9,766	77%
Housing Units built before 1980 with children present	605	3%	340	3%

Source: eCon Planning Suite: 2007-2011 ACS

Second, over half of Norwalk's housing stock is now at least 50 years old and some portion needs substantial improvements such as electrical upgrades, bathroom and kitchen work, and roofing or other exterior repairs necessary in order to meet current health and building codes. Those housing units in need of age-related renovations are likely to be located in those Census Tracts that have already identified as having a high potential to present lead-based paint hazards.

Finally, housing that is older and in poor condition is more likely to pose general environmental health hazards than newer, well-maintained housing. The presence of rotting wood, poor or deteriorated insulation, or leaking roofs, windows and doors may result in elevated levels of mold, mildew, insect droppings or particles, or other allergens that can adversely impact the health of occupants and, in particular, the health of young children and the elderly.

Housing Market

Data provided by HUD in the eCon Planning Suite illustrates that Norwalk is located in one of the most expensive real estate markets in the nation. The housing market in Norwalk reflects its position in the New York metropolitan area. For instance, the City is within commuting distance to Manhattan, one of the financial service centers of the county. Many of the higher paying positions in financial services and attendant industries (high tech included) have migrated north of New York City over the past 30 years. Those employment centers are still within a commuting distance of Norwalk, creating and sustaining demand for housing.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	\$249,300	\$460,200	85%
Median Contract Rent	\$796	\$1,145	44%

Source: eCon Planning Suite: 2007-2011 ACS

Rent Paid

Rent Paid	Number	%
Less than \$500	1,674	13.1%
\$500-999	3,329	26.1%
\$1,000-1,499	4,867	38.2%
\$1,500-1,999	1,851	14.5%
\$2,000 or more	1,015	8.0%
Total	12,736	100.0%

Source: eCon Planning Suite: 2007-2011 ACS

Home Foreclosures

Foreclosure activity continued at substantial levels in Norwalk for the past six months (May, 2014-November, 2014); however, there has been a significant decline compared with the height of the recession. RealtyTrac reported that in October 2014 there were 229 Norwalk housing properties in some stage of foreclosure (default, auction or bank owned). The monthly residential unit foreclosure activity ranged from the mid 20s to the mid 40s in 2014. However, there is a downward trend. For instance, the total of bank owned propriety was down 35.7% in 2014 from 2013 and pre-foreclosure actions were down 19.4% in the same time period.

The Connecticut Home Finance Authority (CHFA) also reports on foreclosure activity with data on "lis pendens" filings. A lis pendens filing essentially begins the foreclosure process by the mortgage holder. From January through June of 2014 there were 128 les pendens filings. This is 226 less than the number of les pendens filings for the same time period in Norwalk in 2009.

In addition to researching data on foreclosures, The Connecticut Housing Finance Authority (CHFA) has two initiatives to work with household at risk of foreclosure. The Emergency Mortgage Assistance Program provides temporary monthly mortgage payment assistance for up to five years. This loan is secured by a subordinate mortgage. Eligibility criteria includes: asset limited to one home, generally favorable credit history prior to financial hardship, and inability to currently meet mortgage obligation. In the past four and a half years, 14 EMAP loans have closed in Norwalk.

CHFA also provides foreclosure counseling, which has been available since 1999. CHFA extends this counseling service through non-profits. The non-profit partner for Norwalk is the Bridgeport Neighborhood Trust. It has been over two years since CHFA foreclosure counseling has taken place in Norwalk. CHFA often works with its partners to offer foreclosure prevention clinics. These are group meetings that review home finance and

foreclosure issues. Typically for a clinic the CHFA has a four step process. First, a community partner is identified. Second, a marketing effort is then instituted, reaching out to the community. Third, the clinic is held at a time and place convenient for people at risk of foreclosure. Homeowner situations may range from an auction scheduled for the home, to an anticipated lay off that may put the homeowner at risk of foreclosure. The fourth step is a referral to individual foreclosure counseling.

Housing Need and Affordability

A basic premise for housing markets is that there must exist a spectrum of housing choice and opportunity for local residents. This axiom establishes that housing choice and needs differ in most communities due to a variety of factors, including: employment mix, household income, population age, proximity of employment and mere preference. A spectrum of rental housing choice and opportunity is particularly important as rental housing can accommodate an assortment of individual and household needs.

Housing Affordability		
% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,930	No Data
50% HAMFI	4,470	500
80% HAMFI	8,370	1,580
100% HAMFI	No Data	4,320
Total	14,770	6,400
<i>Source: eCon Planning Suite: 2007-2011 ACS</i>		

Currently, 47.7% of the City's owner households are now paying in excess of 30 % of their incomes on housing costs. The level of cost-burdened renter households is 55.2% of the total households,

The National Low-Income Housing Coalition, a nationally recognized source of information on housing issues, notes that the maximum rent affordable to a household at less than 30 % of Area Median Income is \$917 in Norwalk, but that the Fair Market Rent in the City for a two-bedroom unit is \$1,703.

In 2014, Johnson Controls, Inc. (JCI) completed a housing market study on Norwalk which serves as a complement to the larger picture provided by the eCon Planning Suite. The JCI study relies on the HUD definition of fair market rent and uses the metro area definition of median income, at \$125,100, compared to \$76,384 for the reported City median income. Nonetheless, the chart below vividly indicates that, in general terms, the required annual household income to afford housing ranges from \$35,000 to \$100,000, depending on the bedrooms size. As JCI indicates: a two-bedroom apartment would not be affordable to over half of Norwalk’s households, studios would not be affordable to over a third, and an estimated 37% of household would not be able to afford any multi-family rental.

Rental Affordability in Norwalk

Norwalk, CT	Income as % of AMI (\$125,100)	HHLDs	%	Percent of Income to afford 2014 Fair Market Rent ¹				
				Studio	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms
2014 Est. HHs by HH Income		34,059	100	\$1,269	\$1,538	\$1,910	\$2,379	\$2,959
CY HHs, Inc < \$15,000	11.99%	3,625	10.64	102%	123%	153%	190%	237%
CY HHs, Inc \$15,000 - \$24,999	19.98%	2,156	6.33	61%	74%	92%	114%	142%
CY HHs, Inc \$25,000 - \$34,999	27.98%	2,429	7.13	44%	53%	65%	82%	101%
CY HHs, Inc \$35,000 - \$49,999	39.97%	4,298	12.62	30%	37%	46%	57%	71%
CY HHs, Inc \$50,000 - \$74,999	59.95%	5,194	15.25	20%	25%	31%	38%	47%
CY HHs, Inc \$75,000 - \$99,999	79.94%	4,641	13.63	15%	18%	23%	29%	36%
CY HHs, Inc \$100,000 - \$124,999	99.92%	3,597	10.56	12%	15%	18%	23%	28%
CY HHs, Inc \$125,000 - \$149,999	119.90%	2,240	6.58	10%	12%	15%	19%	24%
CY HHs, Inc \$150,000 - \$199,999	159.87%	2,322	6.82	8%	9%	11%	14%	18%
CY HHs, Inc \$200,000 - \$249,999	199.84%	1,013	2.97	6%	7%	9%	11%	14%
CY HHs, Inc \$250,000 - \$499,999	399.68%	1,702	5	3%	4%	5%	6%	7%
CY HHs, Inc \$500,000+	399.68%	842	2.47	<3%	<3%	<4%	<5%	<7%
Percent of households whose income is outside the housing affordability range				.24.1	.36.72	51.97	51.97	65.6
I. Percent is calculated based on the maximum income of the household income range.								

Johnson Controls, Inc. also reported that hourly wages now required to afford apartment rental have increased by an average of 8% across the different unit sizes since 2012, while the average annual pay in all of Fairfield county has increased by less than 1% in the past two years. In addition, JCI notes that the average wage to afford the Fair Market Rent (FMR) for housing exceeds the local, average hourly rate for many occupations that are integral to the sustainability of any community – teachers, nurses, firefighters and contractor workers. JCI reported that Norwalk has added 1,169 housing in the years from 2009 to 2014. This compares to less than half that number at 494 new units from 2004 to 2009. As of their report date, JCI estimated that 1,974 multi-family units were in permitting or construction stage in Norwalk.

According to the information from the Connecticut Department of Housing (DOH) in 2012, an estimated 11.4% of Norwalk’s existing housing stock qualified as affordable. Since that time, the figure may have increased with additional construction. Two elements of regulatory approval have served to increase affordable housing in Norwalk. First, accessory apartments are allowed by right in residential zones. Families are able to ease housing costs by renting out the accessory apartment or, in senior years, occupying the apartment and renting the main part of the house. Second, Norwalk has an inclusionary element for regulatory approval for new construction or substantial rehabilitation of housing units at a certain size of development.

NORWALK HOUSING AUTHORITY

The Norwalk Housing Authority (NHA) is committed to providing "safe, decent and affordable housing, and to assist the low-income housing participants to become self sufficient". The NHA is a “high” performer according to HUD (Section Eight Management Assessment Program) and recently was assigned the administration of the New Canaan Housing Authority. As part of

ongoing administration of programs and facility management, The NHA undertakes fair housing activities, including those reported in Section IV in response to the 2010 AI.

The NHA administers 1,240 units of public housing in 18 developments. As of October, 2014, there were 2014 households on the waiting list for public housing.

The average wait for most public housing units in Norwalk is over 2 years. Applicants with disabilities are often placed after a shorter wait. Within public housing, the NHA houses 191 households with a member who has a disability. African-Americans (54%) and Hispanics (35%) are the most significant minorities in public housing.

The NHA estimates a need for \$30 million for improvements to its properties. With an annual budget of approximately \$1.2 million, the NHA has a priority for health and safety improvements, including accessibility improvements. The City has also allocated community development funds for NHA accessibility improvements.

The Norwalk Housing Authority also administers project and tenant-based Section 8 certificates. A total of 715 tenant based certificates are currently in use, including special purpose vouchers for the family unification program and people who are homeless and considered disabled. Again, the most significant minorities in the Section 8 program are: African-Americans (56%) and Hispanics (20%).

The NHA has an opportunity program for certificate holders to move to neighborhoods of higher opportunity. The characteristics of these neighborhoods are: higher incomes, less unemployment, lower concentrations of minority residents and higher homeownership rates. Higher rents are available for these households. In the most recent fiscal year, 13 households moved into higher income census tracts and over 50% of the participating households were minorities.

The NHA offers support services for its residents. The Family Self-Sufficiency program assists households to build financial assets. The NHA administers a Head Start program. The NHA also has instituted two programs aimed at school age children: the Learning Centers and the Scholarship Program. The former has addressed literacy gaps for younger children and the latter has provided a path for youths to higher education.

In 2014 the NHA and the Norwalk Redevelopment Agency were selected by HUD for a Choice Neighborhood Initiative (CNI) Grant of \$30M for Washington Village. Additional funding sources include Sandy Disaster Recovery Assistance (CDBG-DR) and Low Income Housing Tax Credits. In addition to replacement housing units for the existing 136 units at Washington Village, the development will provide 70 workforce housing units and 70 market rate units for a total of 273 units.

The CNI Transformation Plan addresses key neighborhood issues including: housing, safety, education, social services, open space, recreation and economic development. The redevelopment program started in 2014 and is expected to be complete in 2019.

Presently, NHA has a standard for “local preference,” typical of housing authorities in Connecticut. Basically, people who reside or work in Norwalk receive a preference for admission in both public housing and the Section 8 program. In practice, this has worked well for protected classes if they live or work in Norwalk. This is currently true for African-American and Hispanic families, whose representation is greater in the NHA's tenant composition than in the City's and the metropolitan area's general population. Many housing authorities in New England follow a local preference policy. The outcome of the preference policy does not put protected classes at a disadvantage. No action from funding sources, including HUD, has been taken to change this policy for the NHA. The NHA staff will closely follow any changes in HUD direction on this subject and implement different policies accordingly.

ACCESS TO OPPORTUNITY

The Connecticut Center for Fair Housing has worked with the Kirwin Institute for the Study of Race and Ethnicity at the Ohio State University to develop a “community opportunity map” for the state. The Institute has pioneered work in opportunity mapping, essentially to provide an analytic tool as an alternative to previous fair housing efforts. The Institute defines opportunity mapping as a way to quantify, map and visualize the opportunities, which exist throughout neighborhoods, cities, regions and states. Access to opportunity includes obtaining a quality education, living in safe and affordable housing, access to employment networks, living in a community that has access to fresh, healthy foods, and a variety of features similar to these.

The goal of Institute's work for Connecticut was to identify how fair housing could become more an intervention point for marginalized communities across the State. The implicit goal is to provide access to neighborhoods of better opportunity. The work cataloged data that falls into three main areas: Education Quality and Opportunity, Economic Health and Transportation, and Housing and Neighborhood Stability.

In 2010, the Center published “People, Place and Opportunity, Mapping Communities of Opportunity in Connecticut”, written by the Kirwin Institute. The stated purpose of the project was to support and promote inclusive, diverse communities of choice: 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 maps classify neighborhoods according to the following categories of opportunity: very low, low, moderate, high and very high. The maps and report identifies “spatial mismatches” between predominantly minority neighborhoods in older central cities and neighborhoods in suburbs and exurbs.

Other findings of the Center/Kirwin study were that:

- Connecticut has a concentration of subsidized housing in low income areas
- Four in five African American and Hispanic households in the state reside in low and very low opportunity areas
- Marginalized communities are racially isolated from neighborhoods of opportunity

- Low opportunity neighborhoods are concentrated in urban centers including Norwalk and non-white population is clustered in these neighborhoods

The report made the following clear finding for Fairfield County and Norwalk. Fairfield County is a suburb of New York City and the third wealthiest suburban county in the United States. As such, very high opportunity neighborhoods are spread relatively evenly throughout the county. By contrast, low opportunity neighborhoods are concentrated in the urban centers of Bridgeport, Danbury, Norwalk, and Stamford. The non-white population is clustered in these low-opportunity areas. The Institute's map for Fairfield County is in Appendix 2.

In addition to opportunity mapping and equitable regional policy, the report advocates two goals of opportunity community advocacy. One goal is for opportunity based fair housing: fair access to communities of opportunity through affordable housing development and fair housing policy. Sustained affordable housing opportunities must be deliberately connected to high opportunity communities and be linked to support services. The second goal is for neighborhood revitalization. Strategic investments are critical to support the resurgence of distressed low opportunity communities. Initiatives should promote a model of neighborhood revitalization, with the goal of improving neighborhoods while assuring the communities remain neighborhoods of choice that are accessible to all residents.

The Open Communities Alliance, a recently founded public policy non-profit, is dedicated to assisting communities to provide access to opportunity. The Alliance, as does the Institute, focuses on opportunity mapping as a key tool to accomplish this goal.

Work in the area of Access to Opportunity area is, in part, in response to issues of equity and discrimination on a national basis. In 2012, HUD published a joint report with the Urban Institute titled *Housing Discrimination Against Racial and Ethnic Minorities 2012*. The report details discrimination against minority homeseekers in the real estate market place. Information was aggregated from paired testing in 28 metropolitan areas. In a paired test, two people one white and the other minority, present themselves as equally qualified homeseekers and seek information about available homes. HUD has been monitoring discrimination issues in rental and sales markets once each decade since the 1970s. While the testing completed in 2012 found less discrimination than previous tests, differences in treatment did occur. Most importantly, minority homeseekers are told about and shown fewer homes and apartments than whites. HUD encourages local organizations to conduct more proactive testing, especially in the sales market.

III) FAIR HOUSING LAW AND PRACTICES

This section provides an overview of the institutional structure of the housing industry in governing the fair housing practices of its members. The oversight, sources of information, and fair housing services available to residents in Norwalk are described and their roles explained.

DEFINING FAIR HOUSING

Federal Laws

The Civil Rights Act of 1968, Title VIII (the "Fair Housing Act", 42 U.S.C. §3601 *et seq.*) is a federal law which broadly prohibits discrimination in housing, including in the sale, rental, negotiation for, terms and conditions, and services related thereto. Discrimination is prohibited on the basis of race, color, religion, national origin (and sex/gender, added in 1974). The law was amended in the Fair Housing Amendments Act of 1988, to also prohibit housing discrimination against families with children and people with disabilities (mental or physical).

The 1988 amendments also provide people with disabilities the right to "reasonable accommodations" (defined as a change in a policy, practice or procedure, needed by a person with a disability because of their disability — an example would be that even in a "no pets" building, a person with a visual impairment such as blindness would be permitted to have a seeing eye dog) and "reasonable modifications" (defined as a change to the physical structure, such as adding a wheelchair ramp or bathroom grab bars), when such accommodations or modifications are needed because of the person's disability, and which then enable the person to fully enjoy the home they occupy.

Connecticut Laws

Connecticut state law makes it illegal to discriminate against any person on the basis of race, color, ancestry, national origin, religion, familial status, sex, mental or physical disability, age, lawful source of income, marital status, or sexual orientation in the:

- Rental, lease or sale of a dwelling or a lot
- Provision of a mortgage or rehabilitation financing
- Provision of real estate brokerage services
- Advertisement for sale or rental of housing
- Appraisal of a property
- Terms and conditions of rental or sale of housing or
- Provision of property or hazard insurance.

Fair Housing Defined

In light of the various pieces of fair housing legislation passed at the federal and state levels, fair housing throughout this report is defined as follows:

Fair housing is a condition in which individuals of similar income levels in the same housing market having a like range of housing choice available to them

regardless of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, age, lawful source of income, and sexual orientation.

Impediments Defined

Within the legal framework of federal and state laws and based on the guidance provided by the HUD Fair Housing Planning Guide, impediments to fair housing choice are defined as:

Any actions, omissions, or decisions taken because of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, age, lawful source of income, or sexual orientation, which restrict housing choices or the availability of housing choices; or

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, ancestry, national origin, religion, sex, disability, marital status, familial status, age, lawful source of income, sexual orientation.

To affirmatively promote equal housing opportunity, a community must work to remove impediments to fair housing choice.

"Protected Classes" Defined

The Fair Housing Law and other legislation, including Connecticut law, define the "protected classes," those who are specifically protected from discrimination. These classes are:

race/color, national origin/ancestry; sex; creed; religion, physical, mental or learning disability; familial status (families with children, pregnant persons, and those seeking legal custody of a child); marital status; age; lawful source of income; sexual orientation.

Fair Housing and Affordable Housing

When talking about "fair housing" and "affordable housing" the two phrases are often used interchangeably. The concepts are distinct, but intertwined. However, it is important to distinguish between the two in order to clearly identify issues and reduce fair housing discrimination. The phrase "fair housing," in the context of preparation of an AI, refers to persons (families, seniors, individuals, and special needs populations) who are members of protected classes, as specified by federal and state statutes. It is illegal to discriminate in the provision of services to people on the basis of their membership in a protected class in the sale, rental, financing, and insuring of housing. On the other hand, "affordable housing" generally refers to the ability of households to afford to buy or to rent housing, based on income. Specifically, most federal, state, and local funding programs to support the increase in the supply of affordable ownership and rental housing are targeted to low- and moderate-income households. Low-income households are defined by most of those publicly funded programs as earning less than 50% of the HUD determined area median income (AMI), with moderate-income households earning 50% to 80% of the AMI. In certain instances, affordable housing programs address households with incomes greater than 80% of the AMI.

Because the two concepts are different, tools to address fair housing are distinguished from tools to increase the supply of affordable housing. One difference is that issues of discrimination regarding fair housing can apply to all income levels, because protected classes are represented in all income groups.

Clearly, there are many actions that can and should be taken that are directly aimed at elimination of discrimination against federally and locally protected groups in the selling, renting, financing, and insuring of housing, as recommended in this AI report. Those actions include: education of prospective homebuyers and tenants as to their rights to access to housing opportunities; and, enhancement of the system to study, receive complaints, investigate complaints, resolve complaints, and/or bring charges and prosecute violations of federal and local fair housing laws. While robust implementation of these actions will decrease discrimination in housing, it is not likely that such actions taken alone will eliminate housing discrimination.

Addressing the impediments to fair housing, and actions to eliminate related discrimination, can consider the examination of local policies, plans, programs, and projects that preserve an adequate supply of affordable housing. Examination of these points is important because they lead to a greater diversity of housing choices, price points and supply that exists in the market, thus lowering the potential for discrimination to occur.

The following provides an overview of the institutional structure of the housing industry in governing the fair housing practices of its members. The oversight, sources of information, and fair housing services available to residents in Norwalk are described and their roles explained.

As described above, City residents are protected from housing discrimination by federal, state, and local laws. These laws are enforced by agencies at each level and persons have a number of alternatives for seeking assistance if they feel they have been discriminated against. At the federal level, HUD and the Department of Justice have enforcement authority. Reports and complaints are filed with these agencies and the Department of Justice may take legal action in some cases. Typically fair housing service providers work in partnership with HUD and state agencies to resolve problems. However, in some cases where litigation is necessary, the case may be resolved via administrative filing with HUD or the state; referred for consideration to the Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section; or referred to a private attorney for possible litigation.

CONNECTICUT ORGANIZATIONS WORKING FOR FAIR HOUSING

In addition to filing directly with HUD or in federal court, Norwalk residents can file complaints under Connecticut's Discriminatory Housing Practices Act. These complaints may be filed at the state's administrative agency, the Connecticut Commission on Human Rights and Opportunities

(CHRO), or directly in state or federal court. Complaints filed with the CHRO are automatically considered dually filed with HUD, assuming a federal violation is alleged.

Through its Fair Housing Unit (FHU), the CHRO processes and investigates all complaints of housing related discrimination filed with CHRO. FHU staff is available to answer questions regarding the state and federal fair housing laws and the application of these laws. FHU monitors and enforces conciliation agreements if necessary, as well as conducting various audits to ensure compliance with the state and federal fair housing laws. FHU staff also participates in training and education and outreach activities. CHRO is funded through HUD to process complaints as part of the HUD Fair Housing Assistance (FHAP) program. To be eligible for assistance through the FHAP, a state or local agency must demonstrate to HUD that it enforces a fair housing law that is **substantially equivalent** to the Fair Housing Act.

The Fair Housing Center of Connecticut Center provides investigative and legal services to residents who believe they have been the victims of housing discrimination. The Center also has provided education and conducted outreach on fair housing and fair lending issues throughout Connecticut. The Center has worked with the State of Connecticut, cities, towns, housing developers, housing managers, and others to promote compliance with federal fair housing laws. Starting in 2008, the Center expanded its work to include foreclosure prevention, anti-predatory lending and fair lending efforts. One year later, in 2009, the Center started the Opportunity Project, drawing attention to the significant level of racial segregation in the state's towns and cities. The Kirwan Institute mapped communities of opportunity in the State as part of this effort. While located in Hartford, the Center provides outreach throughout the State, including the Norwalk area.

The Open Communities Alliance is an organization recently formed to address geographic inequality of housing opportunities in Connecticut. Opportunity mapping for Connecticut was originally provided by the Kirwan Institute of Ohio in 2008. The Institute describes opportunity mapping as a research tool used to understand the dynamics of "opportunity" within metropolitan areas. The purpose of opportunity mapping is to illustrate where opportunity rich communities exist (and assess who has access to these communities) and to understand what needs to be remedied in opportunity poor communities. Opportunity mapping builds upon the history of using neighborhood based information and mapping to understand the challenges impacting our neighborhoods.

An extensive body of research has established that neighborhood conditions and proximity to opportunities such as high performing education or sustainable employment have a critical impact on quality of life and self-advancement. The central premise of opportunity mapping is that residents of a metropolitan area are situated within an interconnected web of opportunities that shape their quality of life. Opportunity mapping provides an analytical framework to measure opportunity comprehensively in metropolitan regions and determine who has access to opportunity rich areas. Opportunity mapping also provides a framework to assess what factors are limiting opportunity in a community and can assist in identifying what measures are needed to remedy these impediments to opportunity.

The Alliance has taken the mapping provided by the Kirwan Institute and updated it to provide more current information about communities of opportunity in Connecticut.

The Fair Housing Association of Connecticut, Inc is a 501(0) (3) non-profit membership organization founded in 1979. The Fair Housing Association of Connecticut, Inc.'s mission is to eradicate housing discrimination in Connecticut by serving as a statewide resource for fair housing professionals that work with other nonprofit groups and organizations in order to meet the fair housing needs of the people of the State of Connecticut. Its mission is furthered by providing information and education concerning fair housing issues and strategies, assisting residents in investigating instances of alleged housing discrimination, and/or partnering to institute fair housing enforcement actions with the assistance of a panel of fair housing attorneys as well as in cooperation with legal services organizations and the Connecticut Fair Housing Center.

CITY OF NORWALK ORGANIZATIONS WORKING FOR FAIR HOUSING

Within its administrative structure, the City has three entities charged with promoting fair housing choice, administering laws and policies that prohibit discrimination in housing, and providing remedies for persons who have experienced a violation of their rights under fair housing laws.

In 1966, the first of these entities, the Human Relations Commission, was created for the purpose of prohibiting discrimination against and providing remedies for city residents who are the victims of discrimination on the basis of race, color, creed, gender, religion, national origin, physical or mental disability, marital status, age, lawful source of income or sexual orientation. The Human Relations Commission has jurisdiction over complaints of a variety of forms of discrimination, including, but not limited to, discrimination in employment, public accommodation, and housing. The Human Relations Commission has the power to receive complaints alleging unlawful housing discrimination; hold hearings; seek the conciliatory resolution of alleged incidents of unlawful housing discrimination; and levy fines for proven instances of unlawful discrimination. In cases of housing discrimination, any matters that arrive directly at the Human Relations Commission or department are referred first to the City's Fair Housing Officer for investigation and, if warranted, assistance in filing a complaint.

The staff of the Human Relations Commission is also the staff for the City's Fair Rent Commission which provides information to landlord and tenants regarding their individual rights and responsibilities, including questions about evictions, security deposits, repairs, lockouts and utilities. Investigatory work by the Commission's staff on landlord-renter issues can lead to a fair housing complaint.

In 1986, two additional entities were established as required by a consent decree arising from the settlement of a lawsuit filed by the National Association for the Advancement of Colored Persons (NAACP) against the City of Norwalk. This lawsuit, filed in the early 1980's, concerned the City's alleged refusal to support efforts by the Housing Authority of the City of Norwalk to

reduce the concentration of lower income and minority persons within South Norwalk through the development of public housing in other neighborhoods within the City.

The entities established by the consent decree are the Fair Housing Advisory Commission (FHAC) and the position of Fair Housing Officer (FHO). The FHAC was established to comply with language in the consent decree requiring the creation of a fair housing advisory committee to advise and assist the City in the development of fair housing policies and programs. The Second Amended Consent Decree states that this Commission "shall have the following duties:

- A. Monitor private and public housing practices for compatibility with fair housing objectives.
- B. Identify problem areas and make recommendations to the Mayor, Common Council and Housing Site Development Agency and other appropriate City agencies and commissions.
- C. Develop policy statements, internal and external communication techniques and recommend housing programs.
- D. Receive and review in a timely fashion the proposed budget for the Fair Housing Office, thereafter making any revisions to the budget it deems necessary or advisable and submitting said budget in a timely fashion consistent with the City's budget process for grant agencies.
- E. Receive and review the Fair Housing Officer's annual report. Upon acceptance of said Report by the Fair Housing Advisory Commission, said such report shall be submitted to the Mayor, the Housing Site Development Agency, and any other appropriate City commissions and agencies.
- F. Participate and assist in the selection of any Fair Housing Officer as set forth in § 59A-16A.
- G. Accept outside funds. The Fair Housing Advisory Commission may, as permitted in the City Code and in a manner approved by the Finance Director, solicit and accept outside funds, gifts or bequests, public or private, with the assistance of the Fair Housing Officer, consistent with the purpose of the Commission, in order to finance its activities. The outside funds cannot be used to advance or pay the salary of the Fair Housing Officer. The City may reasonably consider the receipt of outside funds when considering the budget of the Fair Housing Office."

The position of Fair Housing Officer was established to conduct "evaluation and outreach to affected groups, planning, and analysis of housing patterns and practices, and monitoring and advocacy regarding fair housing violations." The Fair Housing Officer receives complaints of housing discrimination, has primary responsibility to investigate those complaints, and, where warranted, assists complainants in filing actions with the Norwalk Human Relations Commission, the CHRO, or in court. The Fair Housing Officer also functions as witness and/or advocate in any actions filed by victims of housing discrimination.

The consent decree also stipulated that the City would actively support fair housing in other ways including: the construction of 25 units of public housing on Main Avenue and Chapel Street; the commitment of funding by the city to support the development of affordable

housing; and the design and implementation of new zoning ordinances providing "appropriate density bonuses to new or substantially rehabilitated multi-family residential developments in which a percentage of units will be made available to low or moderate income persons."

Actions taken pursuant to the consent decree have resulted in the following achievements:

1. Implementation of density bonuses for affordable housing development as part of the City's Zoning Regulations at § 118-1050.
2. Creation of the Fair Housing Advisory Commission.
3. Creation of, and annual funding for the position of Fair Housing Officer for the provision of outreach, investigative and counseling services to households seeking to identify or assert their rights under local, state and federal fair housing and related civil rights laws.

IV) IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE AND ASSESSMENT OF CURRENT FAIR HOUSING PROGRAMS AND ACTIVITIES

REVIEW OF ACTIONS TAKEN TO OVERCOME IMPEDIMENTS

The 2010 AI listed impediments and recommendations. As noted above, the full 2010 AI including detailed recommendations is available at the Norwalk Redevelopment Agency and the Norwalk Fair Housing Office. Both offices also have detailed reports on the department/agency actions to implement the recommendations of the AI. The following provides a summary of those recommendations, which are addressed on an ongoing basis. This section then reviews activities and actions taken to address the impediments by the following agencies:

- Norwalk Fair Housing Advisory Commission (FHAC) and the Norwalk Fair Housing Officer (FHO)
- Norwalk Housing Authority (NHA)
- Norwalk Redevelopment Agency
- Norwalk Planning Commission
- Norwalk Zoning Commission.

Impediment One — Discrimination in the Housing Market

The 2010 AI reviewed demographic information, discrimination complaint data, and data obtained from interviews indicating that there is housing discrimination among persons in the protected classes.

More refined statistical data is necessary however to identify the depth of such problems and the specific topics of concern. This level of focused, accurate and current data is not readily available to the City. The recommendations below address the means by which to obtain more current and insightful information.

In the current economy, the incidences of discrimination focus on rental housing, and the focus of efforts in the immediate future should be upon aspects of discrimination in that market.

To address this impediment, the 2010 AI recommended: fair housing education, including outreach to ethnic religious and service groups, and outreach in Spanish; fair housing training sessions; monitoring fair housing complaints and issues; increasing housing choice alternatives for the disabled and families with children; convening focus groups on fair housing; addressing data collection and analysis.

The **Norwalk Fair Housing Advisory Commission (FHAC)** and the **Norwalk Fair Housing Officer (FHO)** continue to undertake a comprehensive response to fair housing issues. The FHO educates households and housing related organizations by disseminating Fair Housing law literature, conducting Fair Housing law seminars and training, and focusing public awareness

campaigns about Fair Housing law in ethnic and minority neighborhoods, and among civic, social, religious and special interest groups.

In response to Impediment one, the FHO educates households and housing-related organizations on a daily basis. Printed Fair Housing materials, in English and Spanish, are broadly disseminated by the FHO. The FHO does Fair Housing trainings at the Norwalk Housing Authority typically 3-4 times per year, for new Section 8 recipients. The FHO provides Fair Housing trainings to civic, social, religious and special interest groups. The FHO also provides Fair Housing training to non-profit staff and clients in Norwalk, including STAR (a non-profit serving adults with developmental disabilities), Keystone House, the Open Door Shelter and others.

According to the FHO reports, that office also conducts training sessions and information campaigns among rental property owners and managers as well as apartment owner associations and management companies. These training sessions and information campaigns are conducted on a regular basis.

The FHO monitors Fair Housing complaints and issues across various venues and organizations, such as HUD, the Connecticut Commission on Human Rights and Opportunities (CHRO) and the Connecticut Fair Housing Center.

The FHO understands that educating the disabled and families with children will help to increase housing choice alternatives. Again, the FHO continually works with non-profits and City departments serving those with disabilities (including STAR and the NHA) and families with children (the NHA). Further, the FHO has provided education to architects, developers and others in the building trades, as to Fair Housing Act design and construction requirements (addressing accessibility for people with disabilities).

The FHAC regularly convenes focus groups of advocacy groups, community based organizations, real estate industry professionals, lenders, property owners and government agency officials to review and assess Fair Housing issues. For instance, the FHAC is structured with membership that includes the Norwalk Housing Authority (a property owner and real estate industry professional organization), Connecticut Legal Services (community advocates/attorneys), Norwalk Redevelopment Agency (lenders and redevelopers), and the NAACP (community organization and advocacy group). The FHAC meets monthly. It already identifies discriminatory practices, trends, or changes in these practices, focal points of discriminatory practice and the means or methods to address them.

The FHAC and the FHO updates Fair Housing information regularly and adjust strategies and actions accordingly.

The FHO continues to reach out to municipal and non-profit agencies to expand data collection and analysis capabilities. Each year, the FHAC publishes an annual report which includes trends and underlying causes of complaints filed with the FHO. These complaints and the trends they represent are an important source of primary information as data.

The **Norwalk Housing Authority** (NHA) has and will continue to work to educate households about Fair Housing among program applicants and participants in both the Public Housing and Housing Choice Voucher programs.

Specific actions the NHA has and will undertake to educate households include:

- a. Providing a link to Fair Housing and Fair Rent Commission on the NHA website.
- b. Provide announcements of requested fair housing trainings in NHA monthly newsletter.
- c. Support Resident Advisory Board members in any fair housing activities including cost of training in fair housing
- d. Invite the Norwalk Fair Housing Officer to briefings for the recipients of Section 8 vouchers.

The NHA will continue two tier Housing Choice Voucher Payment standard to promote participants selecting housing in areas with lower crime and more economic, ethnic and racial diversity, thus promoting the deconcentration of poverty. This program is effectively implementing an “Area of Opportunity” program to affirmatively further fair housing.

The NHA works to overcome language barriers as follows. The NHA:

- a. Provides interpreters as needed
- b. Refers ESL program participants to ESL programs at the Adult Education Program of the Board of Education and Norwalk Community College.
- c. Employs staff who speaks Spanish in Public Housing, Housing Choice Voucher and Self Sufficiency areas.

The NHA works to develop and rehabilitate additional affordable housing accessible to persons with disabilities and families with children. Specifically, NHA will:

- a. Continue to provide requested physical improvements in Public Housing. If these are deemed reasonable accommodations as most historically have been, then there is/was no charge to the resident for these modifications. If the request is not a reasonable accommodation, the work will be completed if the resident pays for the work. These improvements are often supported by Community Development funds.
- b. Advise participating landlords in the Housing Voucher program that persons with disabilities must be permitted to have modifications made to the apartment, at their expense to accommodate a disability. NHA’s staff will refer persons needing modifications to Norwalk Redevelopment Agency for possible financial assistance.
- c. Meet the housing needs of families with children. One example is the recent renovations to common hallways of Roodner Court. Roodner Court has 196 apartments with 2 or more bedrooms occupied by families with children, pending HUD allocation.
- d. In preparing the proposed Capital Fund Programs in collaboration with NHA residents, the NHA staff has and will continue to address rehabilitation that meets the needs of with children, people with disabilities and the elderly, many of whom are disabled.

- e. Apply for any new Housing Choice Vouchers that are made available by the Department of Housing and Urban Development whether vouchers are for persons with disabilities or for the general program-eligible population.
- f. Continue to give a priority to improvements for accessibility, when funds are available. For instance, the NHA expects to seek community development funding for this purpose.

The NHA wait list gives preference to households with a mobility disability for accessible units. Residency of the applicant is not an issue, as the NHA will reach out to agencies working with the disabled on an area wide basis. Any NHA preference for Norwalk residents has been tested legally. HUD is aware of this preference which has been accepted not only in Connecticut but throughout New England.

The **Norwalk Redevelopment Agency** (the Agency) began developing a program to provide accessibility improvements. This is to include financial support (grants or low-interest loans) for low- and moderate-income homeowners in need of, but unable to afford, installations such as grab bars, wheel chair ramps, or other improvements which would have the direct effect of making their homes more able to accommodate their disability. The Agency will also provide such grants and/or low-interest loans to private landlords with tenants requiring reasonable accommodations.

The Agency will continue to support provision of housing choice for families with children. The redevelopment of Washington Village with the Choice Neighborhood program is one example. This redevelopment will involve the replacement of 136 obsolete public housing units with 136 newly constructed public housing units, as well as an additional 137 units of otherwise affordable and also market rate units, replacing 31 three-bedroom units with larger three-bedrooms, and adding one additional three bedroom and four additional four-bedroom units. Those three- and four-bedroom units are designed to be family-friendly, being provided front stoops with direct access to the outside. The Agency is the co-lead for the project along with the Norwalk Housing Authority.

The Agency works continuously with developers to ensure new residential properties include affordable units appropriate for families with children.

In general terms, the Agency works to affirmatively further fair housing through community development initiatives, including the completion and updating of the Analysis of Impediments.

The **Norwalk Planning Commission** works for fair housing by encouraging housing that offers opportunity to a wide diversity of households. For instance the Commission advocates and offers regulatory relief to accommodate accessory apartments. This innovative policy permits single family home owners to provide accessory apartments. While the choice of the occupant is up to the owner, the housing unit is often occupied by a senior (related) person. That person often has a disability. The City has budgeted funds to create low and moderate income housing whose occupants are often in 'protected' classes, including the disabled and families with children.

The **Norwalk Zoning Commission**, with its land use regulations, has an impact on fair housing. The Commission has adopted amendments to the Building Zone Regulations which have resulted in the approval of 1,335 new housing units, including 140 new workforce housing units. While the Zoning Commission cannot require that housing be built for specific groups of people, the Commission believes that the increased supply of housing will provide new housing choices for all types of people in the community, including the disabled and families with children. In addition, the Commission has implemented a variety of innovative policies; including the adoption of accessory apartment regulations which permit single family home owners to provide accessory housing units.

Impediment Two - Housing Affordability

In the time since the 2010 AI was completed, interpretations on court decisions have taken place, drawing the distinction between affordable housing and fair housing. As such, this AI update concentrates, in detail, on issues directly impacting fair housing. The 2015-2019 Consolidated Plan will speak to housing affordability in the City. Nonetheless, City efforts will continue to respond to all impediments identified in the original 2010 AI. Those efforts are catalogued on a continuing basis by the Norwalk Fair Housing Officer.

Impediment Three - Zoning, Planning and Land Use Issues

This impediment deals with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. The deconcentration of poverty is one of the key objectives of the City's Consolidated Plan, but this goal should be balanced against the objective of higher-density development with access to transportation and employment centers.

To address this impediment, the 2010 AI recommended that: all City master planning works to provide appropriate housing density, mixed income integration, and is available to protected classes; reasonable accommodation and disabled access issues are properly addressed; 'visitability' and universal design principals be encouraged; encourage neighborhood outreach and information campaigns before development projects are submitted for review and approval.

Future requests for proposals released by the **Norwalk Redevelopment Agency** for planning studies with a housing component, will include an evaluation of how what is being considered or proposed supports appropriate housing density, mixed income integration and availability to protected classes. The Agency is also working to include the requirement of a neighborhood outreach plan for any project submitted for review with a total cost of more than \$500,000.

The **Norwalk Planning and Zoning Commissions** implements provisions of the Norwalk Plan of Conservation and Development (Housing Section) to encourage a diversity of housing types to serve all sectors of the community, including the disabled and families with children. Commission staff members join the Norwalk Building Department staff in Code Enforcement (CEAC) meetings on new developments. Staff works to ensure that the design for new housing development meets or exceeds the accessibility requirements contained in applicable codes.

The Planning Commission meetings on new regulations are open to the community and subject to the requirements of the Language Access Plan.

Impediment Four — Lending Practices

The 2010 AI found that some minority groups did have higher rates of loan denial and loan withdrawal than other groups. The City should, to the extent possible, ensure that persons seeking loans for home purchase or improvement are aware of lending practices and procedures.

Recommended steps included developing programs to foster conventional lending and banking services in underserved neighborhoods and to specific groups of persons, working with nonprofits to expand financial literacy and credit counseling programs, especially in minority and lower-income neighborhoods, assisting residents who suspect lending discrimination in bringing complaints to the Connecticut Department of Banking and Attorney General's office for review and enforcement.

The Norwalk Fair Housing Advisory Commission (FHAC) and the Norwalk Fair Housing Officer (FHO) have been able to reach out to a research partner and provide detailed research on mortgage origination in Norwalk. (Reviewed in Part E below). The FHO has experience with the State's Anti-Predatory Lending Task Force and makes appropriate referrals with issues on fair lending.

The **Norwalk Redevelopment Agency** has funded the Housing Development Fund in Stamford to do financial literacy and credit counseling for Norwalk residents.

The **Norwalk Housing Authority** works with its residents for homeownership, one of the goals of the Family Self-Sufficiency program. The NHA conducts programs for clients including financial training and credit repair. Also, the NHA offers Homeownership Training, certified to meet requirements for many subsidized homeownership programs.

FAIR HOUSING COMPLAINT DATA

As described earlier, there are a number of organizations and agencies with oversight in the area of fair housing and discrimination in housing. This section of the Analysis of Impediments will review and assess information about housing discrimination complaints and reports on housing opportunity in Norwalk. Data from the Norwalk Fair Housing Advisory Commission (FHAC), the Norwalk Human Relations Commission (HRC), the Connecticut Commission on Human Rights and Opportunities (CHRO) and the U.S. Department of Housing and Urban Development (HUD) were analyzed for this report.

Local

Fair Housing Advisory Commission

Two reports from City of Norwalk's Fair Housing Officer were used for this analysis: the Annual Report to the Fair Housing Advisory Commission and the report to Norwalk Redevelopment Agency's for the annual Consolidated Annual Performance and Evaluation Report (CAPER) to

HUD. These reports provided detailed information on the number and basis of inquiries regarding housing discrimination for Fiscal Years (FYs) 2010/2011 through 2013/2014. It is the Fair Housing Officer’s practice to tabulate all inquiries regardless of whether they have the legal grounds to support advancing to the complaint stage. The Fair Housing Officer addresses cases regarding leases, security deposits, utilities, repairs and evictions in addition to discrimination. The number of inquiries about housing discrimination by tenants and landlords/realtors more than doubled from 161 in FY 2010/2011 to 394 in FY 2013/2014.

**Fair Housing Advisory Commission - Housing Discrimination
Inquiries Tenants & Landlords**

	2010-2011	2011-2012	2012-2013	2013-2014
Tenants	88	138	195	366
Landlords	73	124	194	28
Total	161	262	389	394

Fair Housing Advisory Commission – Tenant Housing Discrimination Inquiry Basis

Protected Class	2010-2011	2011-2012	2012-2013	2013-2014
Race	8	22	19	35
Creed/Religion	9	17	18	39
Color	13	21	20	
National Origin	10	18	20	33
Ancestry	2		2	
Sex/Gender	2	5	7	
Marital Status	3	14	21	38
Age	3	8	10	25
Source of Income	14	4	14	52
Familial Status	6	10	23	66
Disability	18	17	30	59
Sexual Orientation		2	9	19
Gender Identity/Expression			2	
* Inquiries from tenants only from 2010-2010 through 2012-2013				

From FYs 2010/2011 to 2013/2014 tenant inquiries to the Fair Housing Officer quadrupled. Tenant inquiries including the basis of marital status were thirteen times greater in FY 2013/2014 than they were in FY2010/2011. Inquiries including the basis of color had a notable drop off in FY 2013/2014. According to the FHA reports, the three most numerous basis of discrimination in ascending order, have most often been:

- Familial status;
- Disability; and
- Source of income.

The Fair Housing Officer followed up on all claims, filing complaints when investigation shows enough evidence to support a claim. According the FHO report for the 2013-2014 program year, 18 matters were prepared for litigation and eight, which could not be resolved, were advanced to pro bono attorneys. The FHO frequently assists clients to file a complaint with the Connecticut Commission on Human Rights and Opportunities.

Human Relations Commission

The Human Relations Commission (HRC) keeps records of the various contacts and complaints it receives. The HRC refers all housing related complaints to the City’s Fair Housing Officer. Inquiries to HCR regarding housing discrimination have decreased 39% from FYs 2010/2011 to 2013/2014. Of all the human relations contacts HCR received during the last four years, the greatest proportion (25%) of discrimination related inquiries were made in 2013/2014, and of those nearly 80% were housing related.

Human Relations Commissions - Contacts

	2010-2011	2011-2012	2012-2013	2013-2014
Human Relations	82	60	69	44
Discrimination	26	26	18	14
Housing	18	9	7	11

Human Relations Commissions - Discrimination Inquiries

Type of discrimination	2010-2011	2011-2012	2012-2013	2013-2014
Employment	26	23	19	16
Housing	18	9	7	11
Public Access	5	8	8	4
Police	2		1	1
ADA	27	18	16	11
Other	18	5	14	9
Total	96	63	65	52

State

Connecticut Commission on Human Rights and Opportunities

The Connecticut Commission on Human Rights and Opportunities (CHRO) is tasked with eliminating “discrimination through civil and human rights law enforcement and to establish equal opportunity and justice for all persons within the state through advocacy and education.” The Norwalk Fair Housing Officer often assists clients to file cases with CHRO. CHRO receives noncompetitive funding from HUD on an annual basis to enforce fair housing laws through the Fair Housing Assistance Program (FHAP). As a FHAP recipient, CHRO reports to HUD. As a state entity, CHRO recognizes a number of bases for discrimination which the federal government does not and CHRO and HUD file complaints differently. Due to these differences, CHRO’s independent reporting of cases filed and completed provides an important piece of the picture of housing discrimination in the Norwalk area.

CHRO provided housing discrimination data for the City of Norwalk from FY 2010/2011 through 2013/2014, the four years since the last Analysis of Impediments. This data included the number of cases, the bases of the complaint and the closure status. During these four years a total of 20 cases were filed, some cases had multiple bases. The number of cases filed dropped 50% from FY 2010/2011 to 2013/2014, from a total of six cases filed to a total of three. The distribution of bases for cases has varied significantly during the last four years. Most significantly, in three out of the last four years physical disability has been the bases for at least one case.

Connecticut Commission on Human Rights and Opportunities - Cases Filed

Protected Status	2010-2011	2011-2012	2012-2013	2013-2014
National Origin	1			
Disability - Mental	1	3		
Disability - Physical	1	5		2
Source of Income - Section 8	4			
Age			1	
Familial Status			2	
Ancestry			2	
Retaliation				1
Total Cases Filed	6	7	4	3

Over the course of the last four years the majority of the cases filed with CHRO have been closed. Data provided by CHRO shows that most frequently cases have been “resolved satisfactorily,” and that almost as frequently cases have been “closed by decision of the hearing officer.” HUD provided data on cases filed with the FHAP/CHRO. Only one case in the last four years was closed due to “no reasonable cause.” According to HUD data, from FYs 2010/2011 through 2013/2014 the FHAP/CHRO awarded a total of \$53,000 in compensation.

Federal

Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development (HUD)

HUD’s Office of Fair Housing and Equal Opportunity (FHEO), is a direct recipient of complaints of housing discrimination. It administers the Fair Housing Assistance Program (FHAP) and it works collaboratively with other government agencies on issues of fair housing. The regional FHEO is located in Boston, Massachusetts. Connecticut’s FHAP, which is the Connecticut Commission on Human Rights and Opportunities (CHRO), reports data to the regional FHEO. Upon request the FHEO provided data which includes cases filed with either HUD or the local FHAP, which is CHRO, and cases completed with HUD, the FHAP/CHRO or the U.S. Department of Justice (DOJ). HUD data only includes cases completed with the DOJ, not filed or open cases with the DOJ.

According to data provided by HUD, the regional FHEO filed two cases from the City of Norwalk from FYs 2010/2011 through 2013/2014. During the same period of time two cases were completed: one was an “administrative closure” and the other was determined “no cause.” A total of \$1,250 was awarded during the same time period.

HUD and FHAP/CHRO - Cases Filed

	2010-2011		2011-2012		2012-2013		2013-2014	
	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP
Color								
National Origin		1						1
National Origin - Hispanic		1						1
Religion								
Disability	1			5	1			
Familial Status					1			2
Retaliation								1
Total Cases	1	1		5	1			1

HUD and FHAP/CHRO - Completed Cases

	2010-2011		2011-2012		2012-2013		2013-2014	
	HUD	FHAP	HUD	FHAP	HUD	FHAP	HUD	FHAP
Administrative Closure				1				1
Cause (FHAP)						2		
Conciliated			1	1		1		1
No Cause						1	1	
Total			1	2		4	1	2

As described earlier, there are a number of organizations and agencies with oversight in the area of fair housing and discrimination in housing. This section of the Analysis of impediments will review and assess information about housing discrimination complaints and reports on housing opportunity in Norwalk. In some instances, data at the City level is not available because of the collection or reporting practices of these agencies. The most recent Annual Report of the Norwalk Fair Housing Officer provides much recent and detailed information, though information and reports from the Fair Rent and Human Relations Commissions, the

state Commission on Human Rights and Opportunities, and the Department of Justice were obtained and reviewed.

The most recent available report from the Connecticut Commission on Human Rights and Opportunities notes 174 fair housing complaints, though this figure is statewide. Each case could have multiple bases for the complaint, so the total number of housing complaints described in the statistics totals well over the 174 figure. However, a breakdown of the bases of these complaints reveals that 62 cases mentioned physical disability, 34 mentioned national origin, 26 mentioned color, 25 mentioned race, 25 mentioned source of income (related to Section 8 programs), 24 mentioned ancestry, and 24 mentioned familial status. Physical disability cases are almost twice the number of other bases. In terms of issues filed, the most prevalent were Denial of Rental and Reasonable Accommodation (47 each), and Terms and Conditions with 45 complaints.

The Norwalk Human Relations Commission keeps records of the various contacts and complaints it receives. In the fiscal year 2008-009, the Commission received 82 contacts about discrimination issues. This number includes a wide range of topics including Americans with Disabilities Act, employment, housing, and public accommodation. Of these 82 contacts, twenty-eight were employment related and eleven were housing related. For the first half of the 2009-2010 fiscal year, there were sixteen employment related contacts and six housing complaints. Complaints about housing discrimination matters are referred to the Fair Housing Officer.

The Fair Housing Officer's Annual Report for the Fiscal Year 2008-2009 is a significant source of data and information about impediments to fair housing in the City, and will be cited at length in the paragraphs below.

The report notes that the office received 2,227 requests for service in 2008-2009, an increase of 18.0% from the previous year. The Office tracked inquiries by source — tenant or landlord — and noted that of 1,170 tenant inquiries, 121 were based upon discrimination, 341 were security deposit issues, 331 related to eviction, and 271 related to lack of repairs or utilities. The discrimination figure is a significant 75% increase from the previous year figure.

Landlord/realtor inquiries totaled 1,057 for the year and represented a 42% increase over the preceding year. Eviction was by far the greatest topic of concern with 332 inquiries; security deposits had 285 inquiries, and lack of repairs had 200 inquiries. Discrimination and other, which included foreclosure, each had 120 inquiries.

The tenant-based inquiries about discrimination had the following breakdown according to the report:

Race	15
Creed/Religion	8
Color	15
National Origin	12
Ancestry	3
Sex/ gender	8
Marital Status	8
Age	5
Source of Income	12
Familial Status	10
Disability	13
Sexual Orientation	3

The Fair Housing Officer followed up on all claims, filing complaints when investigation shows enough evidence to support a claim. The report notes that most complaints were resolved without filing a formal complaint. During Fiscal Year 2008-2009, two of the 112 tenant complaints required a formal filing, and these were referred to attorneys on the Office’s pro bono attorney list.

The most numerous discrimination issues according to the annual report were:

- > Race/color
- > Disability (including reasonable accommodation issues)
- > Lawful source of income

The implementation of a testing program would further facilitate the identification of patterns and trends.

LANGUAGE

In 2012 and 2013, the City of Norwalk published two critical documents concerning language impediments. As the title indicates, The Four Factor Analysis (2012) examined the following four issues: the number and proportion of Limited English Proficiency (LEP) persons served or encountered in the population served by the City; the frequency with which LEP persons come into contact with City services; an assessment of important of services, programs, activities and information provided by the City; an assessment of costs for interpretation. The analysis provided base line information concerning LEP. Spanish speaking people were by far the most likely to be LEPs. For instance, the U.S. Census identified 11% of the population to be LEP speaking Spanish. The Norwalk school system identified 29% of students speaking Spanish at home. Other languages spoken by LEP persons or at the home of students were Haitian Creole, Greek, Italian, French, and Polish. An LEP person is considered to speak English “less than very well”.

In March 2013, the City approved a Language Access Plan which provides standards and procedures for providing oral and written language assistance to LEP persons. These resources include bilingual staff members and a language line. Provision is made for translation at public meetings or hearings. The Plan provides for written translation and a priority for documents to be translated. The Plan details point of service contact and staff training. The City's Language Access Coordinator is the Director of the Human Relations and Fair Rent Department. He has the responsibility for insuring language access through training and monitoring. The Language Access Plan and the Four Factor Analysis are available through the Human Relations and Fair Rent Department and the Norwalk Redevelopment Agency.

REAL ESTATE PRACTICES

Discrimination has occurred with frequency on the business side of housing: selling, renting and managing real estate. The Connecticut Real Estate Commission, of the Connecticut Department of Consumer Protection, has three different approaches to training for fair housing. Required course work to initially obtain a real estate license includes a fair housing "module". The examination has test questions specifically designated to test the applicant's knowledge and understanding of that law. In order to recertify the license, realtors are also required to fulfill ongoing education requirements. Available course work to complete this requirement includes fair housing subjects. Realtors belong to the Connecticut Board of Realtors and may belong to the Fairfield County affiliate. Neither group takes fair housing complaints, but rather forwards them to the Connecticut Commission for Human Rights and Opportunities.

Landlords are not certified by any government entity with any consideration for fair housing issues. Often landlords violate fair housing law because of lack of knowledge. The Housing Development Fund, located in Stamford, has initiated a program for landlords, the Landlord Entrepreneurship and Affordability Program (LEAP). The LEAP program, along with several other HDF administered programs, is active in Norwalk. LEAP provides training and finance for owner occupants to acquire and manage 2 – 4 family properties. A key element in their training is fair housing.

TRANSPORTATION

While Norwalk is served with important interstate (I-95) and state (including Rt. 7) highways, transit access is also critical as it provides low and moderate income people with transportation options. This access can be critical to job opportunities within and outside the City.

The City of Norwalk is served by the Norwalk Transit District (NTD). NTD's local bus service, WHEELS includes 13 bus routes throughout the city. These routes have an average daily ridership of 4,300 passengers. Additionally, NTD runs four commuter shuttles to transport commuters from the South Norwalk Rail Station to employment locations, such as Norwalk Hospital, Norwalk Community College and employment corridors on Route 7. NTD also operates a paratransit service (e.g. door-to-door service for persons with disabilities) that has a daily ridership of 85 passenger trips.

There are two rail stations in Norwalk, both operated by the Metropolitan Transportation Authority (MTA). The MTA manages public transportation in the State of New York, as well as two counties in Connecticut, including Fairfield County where Norwalk is located. Commuters can travel by rail as far northwest as to New Haven and as far southwest as to Grand Central Station. The MTA reports that the East Norwalk station has an average of 681 weekday costumers and the South Norwalk station has an average of 2,191 customers.

The map in Appendix 2 depicts the NTD bus routes in relation to the City's Limited English Proficient (LEP) population. There is a correlation between the neighborhoods where higher populations of LEP persons live and the accessibility of the bus.

HOME MORTGAGE LENDING DATA AND PUBLIC POLICIES

This section of the AI evaluates lending practices in Norwalk, using Home Mortgage Disclosure Act (HMDA) data.

Home Loan Activity

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate-income persons and neighborhoods. The Home Mortgage Disclosure Act (HMDA) requires financial institutions with assets exceeding ten (10) million dollars to submit detailed information on the disposition of home loans. The data is aggregated and reported by the Federal Financial Institutions Examination Council (FFIEC), which is a federal interagency body.

In the 2010 AI , two types of financing, conventional and government-backed, were examined. Conventional financing refers to market-rate loans provided by private lending institutions such as banks, mortgage companies, savings and loans, and thrift institutions.

Government-backed financing refers to loans offered at below-market interest rates that are typically issued by private lenders and are guaranteed by federal agencies. These loans are offered to lower and moderate income households who may experience difficulty in obtaining home mortgage financing in the private market due to income and equity issues. Several federal government agencies offer loan products that have below—market interest rates and are insured (“backed”) by the agencies. Sources of government-backed financing include the Federal Housing Administration, the Department of Veterans Affairs, and the Rural Housing Services/Farm Service Agency (RHA/FSA). Loans backed by local jurisdictions (such as silent second loans by cities and counties) are not covered under HMDA.

HMDA data provide some insight into the lending patterns that exist in a community. However, HMDA data is only an indicator of potential problems; the data cannot be used to conclude definite redlining or discrimination practices.

The 2010 AI showed that in 2008 there were 3,877 loans originated in the City of Norwalk. At that time, the number of refinanced loans was twice the number of home purchase loans — 1,162 home purchase versus 2,343 refinancing loans. Of the total applications, over 15.0%

were denied, and about 10% were approved but not accepted. The latter indicates the potential buyer's failure to close on the chosen property or a reassessment of the situation.

An important variable in dissecting lending outcomes is the percentage of withdrawn or closed loan applications. An understanding of the home buying and loan processes, income/equity requirements, and financial responsibility are important to a successful loan application and home purchase. Many households, particularly those entering the homeownership market the first time, lack financial knowledge to deal with the home buying process and may end up closing or withdrawing their application. A high rate of withdrawn or closed applications can be indicative of a lack of knowledge of the loan application and/or home buying process, or a lack of adequate assistance by the lender throughout the process.

A review of lending data in 2008 showed that the home purchase loan denial rate in the census tracts with no minority concentration and income levels above 80% of Area Median Income (AMI) was similar to that in the nine census tracts with a significant minority presence and income levels below 80% of AMI. Similarly, the rate of withdrawals for home purchase loans was very similar between the two groups.

The HMDA data provide insight into the numbers of loans applied for, originated, and denied by race and ethnicity, though in 2008 these figures were available only at the MSA level. Thus, a direct comparison or analysis of loan approvals and denials by census tract in Norwalk is not possible. However, the figures are useful for examining trends in the larger market, and assessing the trends in Norwalk.

White loan applicants constituted the vast majority (76.0%) of loan applications for the period, with the "Race Not Available" group a distant second. Hawaiians, Native Americans, and African-Americans had the highest rate of loan denials among the racial groups, each at about 50%. The "Race Not Available" group also had the highest percentage of loan application withdrawals, though "Two or More Minority Races" and Asians were close behind.

The rate of denial for Hispanic applicants was almost twice that of the non-Hispanic applicants and non-Hispanic applicants had the lowest rate of withdrawals.

The table below provides the complete set of data and calculations.

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Stamford-Norwalk MSA
Disposition of Loan Applications by Race/Ethnicity, 2008
(Home Purchase, Refinance, and Home Improvement Loans)

Race/Ethnicity	# Loan Applications	# Loans Originated	# Applications Denied	Loan Denial Rate	Withdrawn, Not Accepted, Closed or Incomplete Loans	Withdrawn, Not Accepted, Closed or Incomplete %
American Indian/Alaskan Native	86	26	44	51.2%	16	18.6%
Asian	1,394	706	324	23.2%	364	26.1%
Black or African American	2,979	983	1,358	45.6%	638	21.4%
Hawaiian or Pacific Islander	148	43	82	55.4%	23	15.5%
White	27,685	15,245	6,481	23.4%	5,959	21.5%
Two or More Minority Races	40	15	14	35.0%	11	27.5%
Joint (White/Minority Race)	80	42	19	23.8%	19	23.8%
Race Not Available	6,211	2,774	1,634	26.3%	1,803	29.0%
Hispanic or Latino	3,639	1,249	1,627	44.7%	763	21.0%
Not Hispanic or Latino	27,226	15,738	6,741	24.8%	4,747	17.4%
Joint Hispanic or Latino	503	302	105	20.9%	96	19.1%
Ethnicity Not Available	6,099	2,781	1,578	25.9%	1,740	28.5%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA), 2008

The HMDA data also shows the reasons for denial by race and ethnicity. The table below shows that among all races and ethnicities the primary reasons for denial were Collateral, Credit History, and Debt to Income Ratio. The topics of Collateral and Debt to Income Ratio had close to the same number of rejections. There is a clear trend in denials when examining the table by race or ethnicity. Native American applicants did have a high percentage of denials based on Collateral, while African-Americans had almost one—third of denials based upon Credit History. Hispanic applicants did have a very high percentage of loans denied because of “Other” factors.

The table below highlights the areas of highest denial, pink for the racial table, and green for the ethnic table.

Stamford-Norwalk MSA Reasons for Loan Denial by Race and Ethnicity, 2008 (Home Purchase, Refinance, and Home Improvement Loans)

Race Ethnicity	Debt/Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Incomplete		Other	
	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases	# Cases	% of Cases
American Indian/Alaskan Native	8	19.5%	3	7.3%	8	19.5%	18	43.9%	0	0.0%	1	2.4%	1	2.4%	2	4.9%
Asian	59	20.6%	7	2.4%	53	18.5%	80	27.9%	10	3.5%	28	9.8%	42	14.6%	8	2.8%
Black or African-American	266	24.2%	7	0.6%	353	32.1%	282	25.7%	41	3.7%	28	2.5%	61	5.6%	61	5.6%
Hawaiian or Pacific Islander	22	11.0%	0	0.0%	25	12.5%	21	10.5%	1	0.5%	2	1.0%	64	32.0%	65	32.5%
White	1545	25.1%	79	1.3%	1071	17.4%	1486	24.1%	181	2.9%	365	5.9%	594	9.7%	833	13.5%
TWO or More Minority Races	4	44.4%	0	0.0%	3	33.3%	1	11.1%	0	0.0%	0	0.0%	0	0.0%	1	11.1%
Joint (White/Minority Race)	18	20.9%	0	0.0%	20	23.3%	22	25.6%	3	3.5%	2	2.3%	6	7.0%	15	17.4%
Race Not Available	396	24.1%	12	0.7%	336	20.5%	361	22.0%	47	2.9%	72	4.4%	193	11.7%	226	13.8%
Hispanic or Latino	466	21.3%	24	1.1%	345	15.8%	444	20.3%	45	2.1%	92	4.2%	79	3.6%	694	31.7%
Not Hispanic or Latino	1497	25.2%	1	0.0%	1160	19.5%	1461	24.6%	182	3.1%	330	5.5%	631	10.6%	688	11.6%
Joint Hispanic or Latino	28	20.9%	1	0.7%	25	18.7%	41	30.6%	3	2.2%	7	5.2%	10	7.5%	19	14.2%
Ethnicity Not Available	355	22.8%	12	0.8%	339	21.8%	332	21.4%	42	2.7%	70	4.5%	153	9.9%	249	16.0%

Source: Federal Financial Institutions Examination Council (FFIEC) Home Mortgage Disclosure Act (HMDA), 2008

Significant changes have taken place in the economy and the home mortgage market since 2008, the time the 2010 AI survey mortgages. The financial crisis that developed across the nation in 2008 because of home mortgage lending practices has changed that industry. Aggressive origination practices had meant that many households defaulted on mortgage debt. This debt included sub-prime loans and had been packaged by the quasi-public agencies: Freddie Mac and Fannie Mae, and many Wall Street firms. The Federal government took over Freddie Mac and Fannie Mae. The underwriting criteria for home mortgages has reverted back to a less aggressive and more traditional lending criteria. A subset of the sub-prime lending was ‘predatory lending’ which often was aimed at minority borrowers, luring them to loans whose terms changed over time. The sub-prime mortgage business basically disappeared after the 2nd quarter of 2008, because there was no secondary market for these instruments.

Recently, the Norwalk Fair Housing Officer requested a HMDA analysis from the National Community Reinvestment Coalition (the Coalition). Data the Coalition used is for the calendar year 2012.

The Coalition reviewed data on 2,236 loans originated in Norwalk in 2012. The Coalition found that “Minority borrowers combined received about 13.8 percent of total prime conventional loans in 2012, which is less than half the percentage of their households. However, minority borrowers received about 29 percent of FHA loans in 2012, which is twice the percentage of conventional loans but comparable to their household percentage. African-American borrowers received a share of prime conventional loans that was about one third of their share of

households, and a share of prime FHA loans that was about two thirds the share of their households. Borrowers in minority neighborhoods (neighborhoods with more than 50 percent non-white population) received 20.63 percent of prime conventional loans which is lower than their portion of owner-occupied units (27.76 percent) in the Norwalk City during 2012. In contrast, borrowers in these neighborhoods received 30.9 percent of prime FHA loans which is greater than their portion of owner-occupied units. Predominantly white neighborhoods (neighborhoods with less than 80 percent non-white population) represent 15.59 percent of owner occupied units while they received 20.54 percent of prime conventional loans.”

The Coalition found that the overall denial rate for conventional loans (see chart below) was about 15 percent in Norwalk during 2012. For conventional loans, the denial rate for non-Hispanic, white individuals was 13.56 percent, and the denial rates for the African-Americans and Hispanics were 23.6 percent and 28.18 percent, respectively (see chart below). As the disparity ration indicates, African-Americans and Hispanics were 1.74 and 2.08 times more likely than whites to be denied conventional loans. The overall denial rate for FHA loans is approximately 16 percent in Norwalk in 2012. The denial rates for African-Americans and Hispanics borrowers for FHA loans were 16.28 percent and 20.63 percent respectively, which are lower than their denial rates for conventional loans.

**Conventional Loan Denial Rates
and Disparity Ratios by Race, 2012**

Race/Ethnicity	Denial Rate	Disparity Ratio
White	14.61%	1.08
White, non-Hispanic	13.56	1.00
Black	23.60%	1.74
Hispanic	28.18%	2.08
Asian	14.58%	1.08
<i>Disparity Ratio is denial rate for loans to a racial group divided by denial rate for loans to non-Hispanic whites</i>		

Denial rates were consistently high for minorities when comparing 2008 and 2012. Most categories saw an increase: again, the denial rate for African-Americans and Hispanics were 23.6 percent and 28.18 percent, respectively in 2012 compared to 21.4% and 21% in 2008. However, the data base divergence (metropolitan in 2008, City in 2012) may contribute to the difference.

V) ISSUES AND RECOMMENDED GOALS AND OBJECTIVES

The first three goals for Housing Marketing, Zoning, Planning and Land Use and Lending are summarized below from the 2010 Analysis of Impediments (AI). The Agencies responsible for meeting those goals are listed. As noted above, the full AI for the City of Norwalk that was completed in 2010 is available at the Norwalk Redevelopment Agency (the Agency) and the Norwalk Fair Housing Office. The City has embraced the AI's goals for continuing action. Responsible City departments and the Norwalk Housing Authority annually report progress toward meeting the goals, which is summarized in Section IV, above. The Agency and Fair Housing Office also have the full progress report on achieving those goals with actions. After the summary of the original 2010 goals, new goals and objectives are detailed.

HOUSING MARKETING

Issue: Recent outreach and the 2010 AI found that there is housing discrimination among persons in the protected classes.

Goal: To address this impediment, the 2010 AI recommended: fair housing education, including outreach to ethnic, religious and service groups, and outreach in Spanish; fair housing training sessions; monitoring fair housing complaints and issues; increasing housing choice alternatives for the disabled and families with children; convening focus groups on fair housing; addressing data collection and analysis.

Responsible parties:

Norwalk Fair Housing Advisory Commission and Fair Housing Officer

Norwalk Human Relations Commission

Norwalk Fair Rent Commission

Norwalk Redevelopment Agency

Norwalk Housing Authority

Timetable: continuing

ZONING, PLANNING AND LAND USE:

Issue: This impediment deals with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. The deconcentration of poverty is one of the key objectives of the City's Consolidated Plan, but this goal should be balanced against the objective of higher-density development with access to transportation and employment centers.

Goal: The 2010 AI recommended that: all City master planning works should provide appropriate housing density, mixed income integration be available to protected classes; reasonable accommodation and disabled access issues should be properly addressed; "visitability" and universal design principals should be encouraged; neighborhood outreach and information campaigns are initiated before development projects are submitted for review and approval.

Responsible parties:

Norwalk Fair Housing Advisory Commission and Fair Housing Officer

Norwalk Planning and Zoning Commissions

Norwalk Redevelopment Agency (particularly for Choice Neighborhood development)

Norwalk Housing Authority (particularly for Choice Neighborhood development)

Timetable: continuing

HOME MORTGAGE LENDING PRACTICES:

Issue: The 2010 AI and an updated analysis of mortgage loan data found that some minority groups did have higher rates of loan denial and loan withdrawal than other groups.

Goal: The City should, to the extent possible, ensure that persons seeking loans for home purchase or improvement are aware of lending practices and procedures. Recommended steps are to develop programs to foster conventional lending and banking services in underserved neighborhoods and to specific groups of persons; work with nonprofits to expand financial literacy and credit counseling programs, especially in minority and lower-income neighborhoods; assist residents who suspect lending discrimination in bringing complaints to the Connecticut Department of Banking and Attorney General's office for review and enforcement.

Responsible parties:

Norwalk Fair Housing Advisory Commission and Fair Housing Officer

Housing Development Fund

Connecticut Housing Finance Agency

Timetable: continuing

2015-2019 GOALS AND OBJECTIVES:

Housing Marketing

Issue: Recent outreach and the 2010 AI found that there is housing discrimination among persons in the protected classes.

Goal: Direct action against discrimination in rental, sale and finance of home.

Objective: Develop a project between Norwalk Fair Housing Office and Connecticut Fair Housing Center for systematic paired testing in Norwalk and surrounding communities; conduct paired testing to determine where discrimination may be taking place; review findings with public agencies and real estate professionals.

Concept: A paired test for fair housing consists of sending two individuals (or two couples) separately to make an inquiry concerning housing. The subject could be renting, buying or financing a home. One couple is a 'majority' couple (for example, white and heterosexual) and the other couple is a member of a protected class (say African American). The individual or couple selected as testers should be similar in all significant respects except for the variable being tested (such as race, gender, familial status, source of income). Their experiences would then be compared to determine if the individual in the protected class may have been the victim of discrimination. The Connecticut Fair Housing Center does paired testing on occasion. The Norwalk Fair Housing Officer occasionally does testing based on a complaint. The project would be systematic and focus on Norwalk and the surrounding communities. Funding from HUD can be explored as part of the Fair Housing Initiatives Program (FHIP).

Responsible parties:

Norwalk Fair Housing Officer

Connecticut Fair Housing Center

Timetable: Fall, 2015

Objective: Provide diversity of housing opportunities in Norwalk by having subsidized units 'float' in mixed income developments.

Concept: In the private marketplace, subsidized units often "float" within a development through the Section 8 tenant based voucher program in order to prevent a distinction between market rate and affordable units. For HUD supported mixed income developments, anecdotal evidence indicates that having the subsidized units "float" is the accepted practice. The Norwalk Housing Authority, the largest provider of subsidized housing in Norwalk will have opportunities for current and future development to implement this concept. Trinity Financial is a development partner of the NHA in the Choice Neighborhood Initiative.

Responsible parties:

Norwalk Housing Authority

Trinity Financial

Timetable: Continuing

Accessibility for Persons with Disabilities

Issue: A total of 14.6 % of Norwalk's population is comprised of persons with disabilities. A review of complaint data shows that discrimination against people with disabilities is one of the highest categories. The 2014 focus group with people who had disabilities revealed detailed issues. Specifically, the following suggestions were made for housing: better exterior access, more multi-bedroom one-story units and more units with accessible design. Also, attendees requested accessibility improvements for sidewalks.

Goal: Increase mobility and housing opportunities for people with disabilities by addressing seminal issues.

Objective: Implement a program to provide accessibility improvements for residences in Norwalk.

Concept: Plan and implement a program to provide technical assistance and finance for accessible home improvements. Leadership for this objective would come from a non-profit such as STAR, or a consortium of non-profits, serving persons with disabilities. Program funding would come from the community development program. The improvements could range from relatively minor improvements such as ramps and grab bars to more extensive work including internal and external entryways, kitchen and bathroom reconstruction. Property owning clients could include individual households where there is a member of that household who is aging in place to property owners who are renovating for conversion to a group home.

Responsibility:

Norwalk Redevelopment Agency (funding)

Non-profit partner which is currently working with people with disabilities

Timetable: Fall, 2015 and continuing

Objective: Improve pedestrian access in neighborhoods, school routes and commercial corridors for people with disabilities

Concept: An increase in the City's American with Disabilities Act (ADA) compliant sidewalks, curb cuts and intersections through accessible pedestrian signals will create a significant improvement in day-to-day access for persons with disabilities. Improved neighborhood access gives people with disabilities better access to housing in nearby neighborhoods and throughout

the City. Staff for the Human Relations Commission has previously planned and implemented pedestrian accessibility improvements.

Responsibility:

Norwalk Redevelopment Agency (Planning and Implementation)

Norwalk Human Relations Commission (Planning)

Timetable: Fall, 2015 and continuing

Objective: Ensure ordinance does not have a disparate impact on people with disabilities.

Concept: Chapter #59-9 of Norwalk's housing code defines rooming houses as three unrelated individuals living together. STAR and other agencies assisting people with disabilities are contracting with owners of residential buildings to house people with disabilities. Previously these agencies sought properties for more than three unrelated individuals. For administrative and program reasons, these agencies are now seeking residential facilities for three clients. However, the housing code includes excessive requirements for certifying/permitting a rooming house which is an impediment for housing people with disabilities.

Responsibility:

City Attorney

Timetable: Winter, 2015

Objective: Provide incentives in new housing developments for visitability.

Concept: Visitability refers to single-family or owner-occupied housing that is designed in a way that makes it easier to be visited or lived in by people who have trouble using stairs or who use wheelchairs or walkers. A visitable home meets the following requirements: zero step entrance, doorways that provide a minimum 32-inch wide, unobstructed opening, a bathroom on the first floor that is compliant with the provisions of the American with Disabilities Act of 1990. The added benefit to these improvements is that it makes the unit visitable and more suitable to aging in place. CT. Public Act 10-56 exempts developers from a requirement to obtain a state building code variance or exemption to construct visitable homes. The Norwalk Redevelopment Agency can work with the Director of Planning and Zoning to develop incentives, as they have for other purposes and the City Attorney can help incorporate these incentives into a local ordinance.

Responsibility:

Norwalk Redevelopment Agency

Department of Planning

City Attorney

Timetable: 2015

Objective: Ensure compliance with Federal design and construction regulations for accessibility.

Concept: The Fair Housing Act includes accessibility requirements beyond those addressed in Norwalk's building code. These requirements address multi-family buildings of four or more first occupied after 3/13/1991. Additionally, all Federally assisted new construction housing developments with five or more units must design and construct five percent of the dwelling units, or at least one unit, whichever is greater, to be accessible for persons with mobility disabilities. These projects must be carefully scoped during the concept and design phase of development. Norwalk needs to have a consistent approach with that responsibility assigned to a position. Given its position with Federal funding, housing and fair housing, the Norwalk

Redevelopment Agency can share this responsibility with the Norwalk Human Relations staff, which has been involved with accessibility issues and improvements. Together those staff should make a recommendation to the Mayor for this appointment.

Responsibility:

Norwalk Redevelopment Agency
Norwalk Human Relations Commission

Timetable: Spring, 2015

Home Mortgage Lending

Issue: Home foreclosures continue in Norwalk at about a third of the volume at the height of the recession. For instance, there were 128 filings for foreclosure in the first half of 2014. While data does not record minority status, typically minorities are often at a high risk of foreclosure. Certainly, data available through the Home Mortgage Disclosure Act (HMDA) filings indicate issues for minorities to qualify for mortgages, with credit record problems and collateral as major barriers.

Goal: Reduce foreclosures for minorities and others by providing help to homeowners at risk of foreclosure.

Objective: Connect with initiatives from the Connecticut Housing Finance Authority (CHFA) for foreclosure counseling activities. The CHFA and its non-profit partner will undertake both foreclosure prevention clinics and individual counseling. Under the general direction of the Norwalk Redevelopment Agency, the South Norwalk Community Center can be the local host. The CHFA marketing may identify other sites for the clinic and individual counseling.

Responsibility:

Norwalk Redevelopment Agency
South Norwalk Community Center
Connecticut Housing Finance Authority

Timetable: 2015

Providing Access to Communities of Opportunity

Issue: Studies by the Connecticut Fair Housing Center and Kirwin Institute have shown that a high percentage of minorities live in low opportunity neighborhoods, particularly African-Americans (81%) and Latinos (79%).

Goal: There are two primary strategies that can be pursued to increase access to opportunity for Norwalk's marginalized populations: to bring opportunities to opportunity- deprived areas, and to connect people to existing opportunities throughout the metropolitan region.

Objective: Bring opportunity to opportunity-deprived areas. Plans for community development, HUD and private financing are expected to bring opportunity to low- income, opportunity deprived neighborhoods in Norwalk with the Choice Neighborhood Initiative (CNI) program. The 136 units of Washington Village, a family public housing development, will be replaced and included in a new 273 unit mixed-income development. The CNI will also include other neighborhood improvements including parks and recreation and housing rehabilitation.

Concept: Key agencies for housing and community development are planning to implement an extensive community revitalization effort through the CNI. While that effort has started, the program's implementation and completion will help the City reach the goal of providing

neighborhood opportunity, with a substantial positive impact on Norwalk's minority population.

Responsibility:

Norwalk Redevelopment Agency

Norwalk Housing Authority

Norwalk Public Schools

Norwalk Police Department

Timetable: 2015, 2016

Objective: Connect people to existing opportunities throughout the metropolitan area.

Concept: HUD's Section 8 program was originally designed to provide regional opportunity to low-income, publically assisted households throughout the private marketplace. Certificates held by tenants should give that household the freedom to choose where they live. However, there are often impediments to the housing search. Those impediments can include discrimination against the tenant because he/she holds the Section 8 certificate, a violation of the Connecticut fair housing law. The Norwalk Housing Authority (NHA) has 715 tenant based certificates. The City can join the NHA in a special counseling effort to help them access areas of high opportunity through marketing of Section 8 acceptance and counseling of tenants to conduct searches in high opportunity areas.

Responsibility:

Norwalk Housing Authority

Timetable: Fall, 2015 and continuing

Objective: Connect people to existing opportunities throughout the metropolitan area.

Concept: The Norwalk Housing Authority could consider increasing the rent levels to 120% of the HUD fair market rent for the Section 8 program to achieve this goal in conjunction with the special outreach recommend above.

Responsibility:

Norwalk Housing Authority

Timetable: Fall, 2015 and continuing

Language

Issue: Language can be an impediment to fair housing choice in two ways. Language can be a barrier to access to actual projects and programs, such as housing rehabilitation. Also, when public input is solicited in planning stages, people who have "limited English proficiency" (LEP) encounter barriers.

Goal: Provide assistance to LEP population

Objective: Update the Language Access Plan

Concept: In March, 2013, the City of Norwalk adopted a Language Access Plan according to guidelines issued by HUD and the U.S. Department of Justice. The Plan, based on a previous Four Factor Analysis, identified 14.6% of Norwalk's population as being LEP. The language spoken by most of the LEPs was Spanish (10.6% of the City population). The Plan and the action steps taken address the language barriers and impediments. The City now identifies people who are LEP through Language Identification Cards; recognizes that language assistance is the responsibility of the City and provides concrete steps to assist LEPs. For instance, bi-lingual City

employees are identified as resources for staff people working with an LEP. Instructions for requesting language assistance are included in legal notices of hearings. Also bi-lingual telephonic interpretation is available when a bi-lingual staff person is not available. The Language Access Coordinator is presently in the office of the Norwalk Human Relations Commission. As provided in the document, the Plan needs to be updated annually in part to adjust the Plan based on the changing needs of the LEP population. For instance, Haitians who speak Creole appear to be a much greater part of the population than indicated in the Plan.

Responsibility:

Norwalk Human Relations Commission

Timetable: 2015 and continuing

**Norwalk Fair Housing Responsibilities: 2010 Analysis of Impediments and
2015 Update to the Analysis of Impediments**

2010 AI

Goal	Responsible Parties	Timetable
Housing Marketing	Fair Housing Adv. Commission Fair Housing Officer Fair Rent Commission Norwalk Housing Authority The Agency*	Present and continuing
Zoning Planning	Fair Housing Adv. Commission Fair Housing Officer P&Zoning Commission The Agency Norwalk Housing Authority	Present and continuing
Lending Practices	Fair Housing Adv. Commission Fair Housing Officer Housing Development Fund CT Housing Finance Agency	Present and continuing

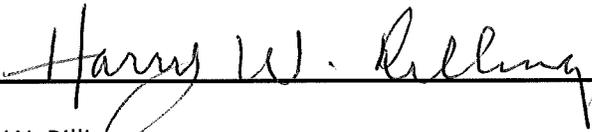
2015 Update

Goal	Objective	Responsible Parties	Timetable
Housing Marketing	Paired Testing	Fair Housing Officer CT Fair Housing Center	Fall, 2015
	Float subsidized units	Norwalk Housing Authority Trinity Financial	Continuing
Accessibility	Accessibility Improvements	The Agency Non-profit partner	Fall, 2015 and Continuing
	Pedestrian Access	The Agency Human Relations Commission	Fall, 2015 and Continuing
	Disparate Impact	City Attorney	Winter, 2015
	Visitability	The Agency Department of Planning City Attorney	2015
	Accessibility Compliance	The Agency Human Relations Commission	Spring, 2015
Home Mortgage Lending	Foreclosure counseling	The Agency South Norwalk Comm. Center CT. Housing Finance Authority	2015
Providing Access to Communities of Opportunity	Choice Neighborhood	The Agency Norwalk Housing Authority Police Department	2015, 2016
	Marketing of Section 8	Norwalk Housing Authority	Fall, 2015 and Continuing
	120% FMR	Norwalk Housing Authority	Fall, 2015 and Continuing
Language	Language Access Plan	Human Relations Commission	2015 and Continuing

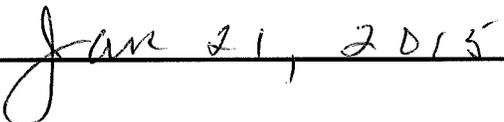
*Norwalk Redevelopment Agency

VI) SIGNATURE PAGE

The undersigned, as Mayor and Chief Executive Officer of the City of Norwalk, hereby recognizes the receipt of the Update to the Analysis of Impediments as of the indicated date.



Harry W. Rilling
Mayor, City of Norwalk



Date

Appendix 1

Minutes from Focus Groups

Minutes from the Public Hearing

Outreach Notices

**City of Norwalk
Five Year Consolidated Plan
And Analysis of Impediments
Focus Group – People With Disabilities
3:00 p.m. September 23, 2014
Meeting Room, Star, Inc, Norwalk, CT
Minutes**

Staff and consultants in attendance:

Hunter Arton, Community Outreach Administrator, Norwalk Redevelopment Agency
Dan Cahill, Consultant
Emily Vander Does, Consultant

Agency description:

The focus group was held at STAR, Inc; Keystone House also had staff and clients in attendance. Both non-profits provide services to clients with physical and mental disabilities. Staff from both STAR and Keystone House were present along with clients.

Minutes:

Dan Cahill started the hearing at approximately 3:00 P.M. There were approximately 25 people in attendance. Mr. Cahill described the planning effort for community development (Consolidated Plan). He also presented an overview of the strategies used for the analysis of impediments to fair housing. He also reviewed the concept of protected classes, and acts of discrimination that are often present in housing markets. Mr. Cahill and Ms. Vander Does then facilitated discussion with questions and comments about the community and housing.

How do you feel about your housing?

- Group homes are restrictive; there is limited privacy and clients don't always get along with caregivers.
- There is a long waiting list for Section 8 and even with Section 8 it is extremely difficult to find an affordable apartment that is safe and sanitary.
- Housing costs are high.
- Affordable housing is poor quality housing.
- There is limited affordable accessible housing. There is a need for:
 - Ramps;
 - Hand rails;
 - Wide doorways;
 - Uncarpeted floors;
 - Large (more than one bedroom) one floor apartments;
 - Sidewalks, and other pedestrian construction for people with mobility issues

- There is limited affordable housing with good access to transportation.
- Access to public and private amenities is important.

Non-housing community development

- Job mobility is limited.
- Employment can result in falling off the “subsidy cliff.”, where no assistance is available and net income is lower.

Discrimination

- Specific incidence of discrimination – landlord kept a “separate pile” of rent applications where the source of income was SSDI.
- Applications are denied for no apparent reason.

Change over time

- Increased independence.
- Apartment re-hab was faster in at least one situation.
- STAR and Keystone have their own source of rental subsidy and direct deposit helps get rent payment to landlords on time.
- STAR underwrites small loans to clients for rental deposits. The state assistance for rental deposits is too slow.

Needs

- Affordable housing – in the last year rent has increased to the point where clients can barely afford an efficiency apartment.
- Space
- Access to laundry
- More forgiving, reasonable and considerate staff in group homes and thank you to the staff for all they do.
-

There was discussion about an issue with a building/housing code requirement concerning Rooming Houses that made it difficult to have 3 or more people in a home supported by STAR services.

Before the meeting ended, Mr. Cahill reviewed sources of assistance when a person with disabilities (or any person in a protected class) experienced discrimination. In particular, the Fair Housing Officer (FHO) for Norwalk was mentioned. A number of attendees had positive experience with the FHO and appreciated her assistance. The FHO’s contact information was distributed. Mr. Cahill ended the meeting at approximately 4:10 P.M.

**City of Norwalk
Five Year Consolidated Plan
And Analysis of Impediments
Focus Group – National Origin (Haitian, Creole Speaking)
7:15 p.m., September 22, 2014
South Norwalk Community Center
Minutes**

Facilitator, staff and consultants in attendance:

Victoire Legerme, Facilitator

Hunter Arton, Community Relations Administrator, Norwalk Redevelopment Agency

Dan Cahill, Consultant

Minutes:

Victoire Legerme was the facilitator for this focus group. Ms. Legerme has an extensive background in community organizing with the Haitian community. Ms. Legerme is from Haiti.

There were nine people in attendance, all of whom spoke Creole. Ms. Legerme began the discussion by stating the purpose of the meeting. She explained the concept of the community development program and fair housing work and planning. She introduced Ms. Arton and Mr. Cahill.

The initial discussion concerned living and neighborhood conditions in Norwalk. People generally felt good about living in Norwalk. There was a wide variety of time since people had moved to Norwalk – between 3 and 22 years. Some attendees felt comfortable in their neighborhoods, others thought that different ethnic groups did not want to socialize with them. They thought that language might be a barrier and generally folks tended to socialize with people they know. People valued a quiet neighborhood.

Next, housing discrimination was discussed.

Issue # 1: **Accent.** Participant had employer with no accent call on her behalf to a landlord about a rental property. Landlord called participant back and after hearing recipient's accent, the landlord did not want to proceed with the rental process and hung up on the client.

Issue # 2: **Small kids.** Landlord stated clearly he/she does not want people with **small kids** (1 kid is an issue, with 2 kids is even worse).

Issue # 3: **Color of skin.** Participant booked an appointment with landlord over the phone; however, when they arrived at the rental property the landlord told them someone else just paid for the apartment and it was no longer available. Weeks later they continued to see the same house available for rent (in Fairfield).

Issue # 4: **Color of skin/Accent.** Landlord increased the price after recipient arrived at the rental location. Recipient felt that was the **color of their skin combined with the accent** that disqualified them for the apartment.

Issue # 5: **Family is too large.** Landlord stated that he/she does not want too many people in the house.

Issue # 6: **Two months security & one or two months' rent were required to rent a place.** Participant indicated that they need help with the renting process.

Issue # 7: **The cost of renting is too high** in Norwalk

Issue # 8: **Credit Issues.** Participants had money available coming from Haiti and ready to rent, but couldn't rent because they did not have enough credit yet in the State. People wanted to build credit up, but creditors would not start the line of credit. In coming to the State most of them feel that they are trapped between jobs that pay less, can't build up credit, and can't rent a place to live.

The conversation continued as Ms. Legerme asked questions, the participants response is summarized as follows.

What would you do to make the neighborhood better?

Now that we know better, we will do better by challenging these issues that the Haitian community is facing.

What is it like to look for housing in Norwalk?

Not fun, the entire process is very painful, landlord don't reach them back after many phone calls.

What is it like to look for a place to rent?

Many rental properties are available, but landlords are not willing to rent to the French-Creole speaking group.

What is it like to look for a place to own?

There is no education for the process of buying a home. There is not enough information available.

What is it like to get a loan to buy a house?

One family tried, but had no success in the process. The banks don't follow up with them.

Before ending the meeting Ms. Legerme reviewed options for people to get assistance when faced with discrimination. One important option is the Fair Housing Officer for the City. Contact information was shared. Ms. Legerme ended the meeting at approximately 8:15 by thanking the attendees.

**City of Norwalk
Five Year Consolidated Plan
And Analysis of Impediments
Focus Group – National Origin (Spanish)
7:20 p.m.
September 22, 2014
South Norwalk Community Center
Minutes**

Facilitator, staff and consultants in attendance:

Oscar Destrugue, Facilitator
Hunter Arton, Norwalk Redevelopment Agency
Dan Cahill, Consultant

Oscar Destrugue started the meeting. He introduced myself, giving his personal history of coming to America as a young boy. Presently he is a Fire Commissioner in the City of Norwalk. He spoke about his desire to help immigrants become informed and integrated into the community.

Mr. Destrugue encouraged people to speak up, stated that everything would be confidential, no names would be mentioned, thus allowing us to have an open dialogue. Next, he introduced Ms. Arton and Mr. Cahill. He explained that the City was reaching out to the community to explain different programs. The City was interested in finding out what it is like to live in Norwalk's neighborhoods and what ideas would be about improvements. Also, the City is researching housing discrimination and would like to see what experiences people are having with housing.

Mr. Destrugue asked, on a scale of 1 to 10, **how do people feel about living in Norwalk?** The response was: "7", we like the west side of Norwalk; "8", it's a very good, safe City; "10 and "5".

The time that people have lived in Norwalk: 35, 15, 12 years and one person/family had been in Norwalk for 5 months.

How do people feel about their neighborhoods?

In the West side of Norwalk, off Ponus Av., we feel very good, a "10".

In East Norwalk, we love the neighborhood, an "8".

For the neighborhood near Rt. 7, we feel very happy with our neighborhood.

What do you like about your neighborhoods?

It's quiet and safe for children to play; neighbors are homeowners and make it nice to live there.

Can you describe neighborhood problems?

There is a lack of police patrols; we had a motorcycle stolen from our garage; but police were very polite when they did respond.

Another response indicated the family is worried about traffic.

Another respondent indicated that there were no problems; another said that people are driving too fast.

One person felt that police are profiling... they were stopped by police who, when they found out that the passengers were Colombian, the police said "where are the drugs".

Another person indicated that garbage collections can be a problem - if you don't put the recycle bin in the right position, they will not take the recycle items.

Rents are high for single people. Landlords set high prices for certain people.

People are skeptical and don't attend meetings like these.

What would you do to make the neighborhood better?

We need more police patrols.

The City should put speed bumps on the streets.

Regulations should be created so that landlords cannot increase rents discriminately.

What is it like to look for housing in Norwalk?

Housing is scarce. Buildings are built with housing, but they are not affordable. For instance, there are new apartments on Rt. 7 but they are exclusive, the rents are high.

Another respondent indicated that there is just no access to housing.

What is it like to look for a place to rent?

Hispanics have a problem looking for apartments. More African-Americans occupy housing.

Apartment prices are beyond our ability to pay and are excessive. We need more oversight over affordable rent units, and that housing should be up to code.

One attendee and his family owns their own home.

Renting is difficult because rental prices are so high. One person felt that they are asked to pay more rent because they are Hispanic.

When asking about an apartment which is really for rent, landlords claim that apartment is already rented.

One attendee was paying \$450 for one room. That room was shared with a friend.

That location was Taylor Ave. The person needed to share room in order to be able to afford the rent.

What is it like to look for a place to own?

One of the attendees indicated that there was no problem finding a home or getting financing. There was an issue with city services. Taxes were high but there is no garbage collection, nor city sewer. You have to bring your own garbage to the garbage dump. This location is near New Caanan.

Mr. Destruge asked the homeowner, what is was like to get a loan to buy a house?

The response was that there was not a problem.

Mr. Destruge then indicated that it is against the law to discriminate, including discriminating because of race, the color of your skin or the place where you are from. Also, it is against the law to discriminate because of Sec 8 or the size of your family.

Has anyone had problems with renting because of this?

The home owner present experienced discrimination on account of being a single mother with two children. Another attendee used Section 8 for a unit on Benedict St., but the landlord wanted to charge me separately for a washing machine.

One family did not get heat during the winter. The landlord puts heat on during hours that their store operates, but not after the store closes.

People are afraid to complain because they don't have documents.

Children here lose respect, neighbors don't say hello.

However, another respondent said that they had no problems with discrimination.

One person experienced a murder occurring in her neighborhood.

Has anyone had problems with buying a home because of this?

One attendee indicated hat they did not.

But, the City has changed. Thirty-five years ago, one attendee lived at one place paying \$425. After I moved out, new tenants payed over \$1000

Next, Mr. Destruge went on to inform attendees of availability of resources to deal with discrimination.

Do people here know about the Norwalk office of fair housing?

One attendee knew about it, but thought it was a non-efficient bureaucracy;

That experience was 35 years ago.

Mr. Destruge made people aware of fair housing office with contact information and encouraged them to contact that office if they feel that they are being discriminated. One can make a fair rental, fair housing claim even if they are undocumented.

Mr. Destruge ended the meeting at approximately 8:00 PM by thanking attendees for coming.

**City of Norwalk
Five Year Consolidated Plan
And Analysis of Impediments
Public Hearing
6:00pm
September 23, 2014
Rm. A330 Norwalk City Hall
Minutes**

Staff and consultants in attendance:

Tami Strauss, Director of Community Development Planning, Norwalk Redevelopment Agency
Hunter Arton, Norwalk Redevelopment Agency
Dan Cahill, Consultant
Emily Vander Does, Consultant

Minutes:

Dan Cahill started the hearing at approximately 6:10 P.M. Mr. Cahill reviewed the purpose and contents of the Consolidated Plan (ConPlan), Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER). He also examined the overall process by which they are completed. Mr. Cahill presented an overview of the strategies used for the analysis of impediments and explained that it is required by the U.S. Department of Housing and Urban Development (HUD) for the City to have the analysis done. In the presentation Mr. Cahill explained protected classes, and acts of discrimination that are often present in housing markets. He described the process of gathering data from the city in various forms, and working with it to create the Analysis of Impediments to Fair Housing.

After the presentation, discussion of issues led to a review of some of the earlier focus groups held concerning the ConPlan and the Analysis of Impediments for Fair Housing. Neighborhood conditions and affordable housing were both top issues for these groups and attendees of the Hearing agreed. Code enforcement as a method of dealing with neighborhood conditions and keeping housing affordable was mentioned. Transportation was also an issue related to availability of employment.

A review of some social services was the next topic. NEON, the area Community Action Agency closed recently. Although there is somewhat of a vacuum, other agencies, including United Way of Coastal Fairfield County, have stepped in to pick up the slack.

At this time, David Kennedy, the Chief Operating Officer for United Way of Coastal Fairfield County, presented several points. The United Way played an integral role in developing the City's 10-year plan to end homelessness and is the lead applicant in the current Continuum of Care (CoC) application. The CoC jurisdictions of Norwalk-Fairfield, Stamford/Greenwich and Bridgeport have applied to merge to enable an expanded regional approach to addressing and

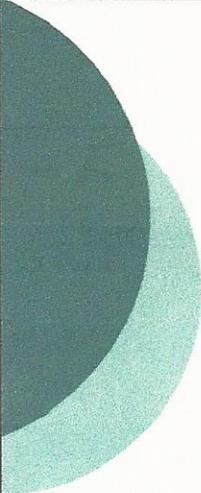
ending homelessness. Attendees recognized that homelessness and affordable housing is not the sole responsibility of any one community. Communities have to seek common ground to solve those issues.

The United Way of Coastal Fairfield County is working to raise awareness for the working poor, especially women and children. Recently the organization launched ALICE a multifaceted program which will address issues for the working poor. ALICE stands for Asset Limited, Income Constrained, Employed.

Toward the end of the meeting the following points were made:

- There is no Habitat for Humanity in Norwalk.
- Childcare issues are important for Norwalk.
- Out of school activities are important for the community.

The meeting ended at approximately 7:00 P.M.



Groupe de discussion: Faisons la lumière sur les affaires de logement et de développement communautaire

Date: Lundi, 22 Septembre, 2014
Heure: 7:30-8:30PM (Français-Créole)
Lieu: Centre Communautaire de Norwalk,
98 South Main Street, 06854

Concernés(es): Des personnes qui sont risquées sont des genres qui font face à la discrimination vue de leurs nationalités ou leurs lieux d'origine

Partagent avec nous tous ce que vous pensez, vos expériences et vos idées, tout ce qui a rapport avec votre voisinage à Norwalk et de discrimination dans les affaires de location de maisons. Aussi dit-nous, comment la ville de Norwalk peut faire pour améliorer cette situation!

Soit actif dans ce Budget!

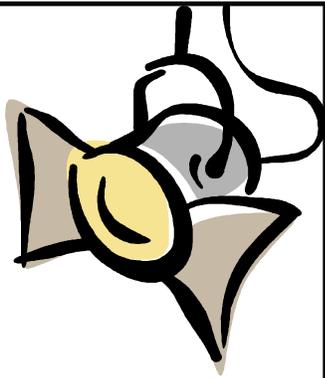
Avant de calculer le budget (plan) pour les 5 nouvelles années à venir, la ville de Norwalk veut d'abord vous écoutez pour pouvoir mieux planifier pour la communauté. Nous souhaitons de vous voir en grand nombres !

!

Pour plus d'information, s'il vous plait appeler Kelly Robertson aux: 203-295-3380. Ce programme est patronné par le centre communautaire de Norwalk et de l'Agence de Redéveloppement de Norwalk.



Public Hearing: Spotlight on Housing and Community Development



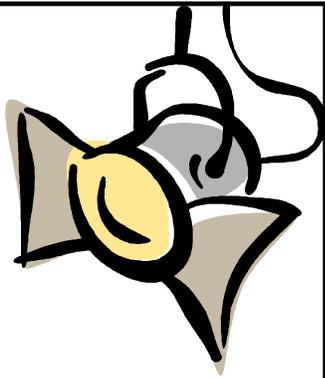
Date: Tuesday, September 23, 2014
Time: 6:00-7:00PM
Where: City Hall, room A330
Topic: Issues relating to housing and community development in Norwalk, including discrimination

Share with us your insights, experiences and ideas relating to Norwalk's neighborhoods and housing discrimination and how we can improve!

Be part of the plan!

The City wants to hear from you as part of developing its new 5-year plan for housing and community development. We hope to see you there!

- This event is sponsored by the Norwalk Redevelopment Agency.
- Persons unable to attend are encouraged to submit written comments no later than 5:00pm on 9/22/14 to kpacchiana@norwalkct.org.
- Oral language assistance for this meeting/hearing, may be obtained by calling 203-854-7810 x46778 or visiting our office at least 48 hours prior to the meeting/hearing.
- Puede obtener ayuda oral para esta reunión/audiencia llamando al 203-854-7810 x46778 o visitando nuestra oficina con una antelación de, al menos, 48 horas antes de la reunión/audiencia.
- Μπορείτε να αποκτήσετε προφορική γλωσσική υποστήριξη για αυτήν τη συνάντηση/ακρόαση, καλώντας στο 203-854-7810 x46778 ή επισκεπτόμενοι το γραφείο μας τουλάχιστον 48 ώρες πριν από τη συνάντηση/ακρόαση.
- Assistenza linguistica orale per questa riunione/udienza, puo' venir tradotto su richiesta chiamando lo 203-854-7810 x46778 o visitando il nostro ufficio almeno 48 ore prima della riunione/udienza.
- L'Assistance de la langue orale pour cette réunion/audience, peut être obtenue en appelant 203-854-7810 x46778 ou en visitant notre bureau au moins 48 heures avant la réunion/audience.
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Focus Group: Spotlight on Housing and Community Development

- Date:** Monday, September 22, 2014
- Time:** 6:00-7:00PM (Spanish)
7:30-8:30PM (French-Creole)
- Where:** South Norwalk Community Center,
98 South Main Street, 06854
- Who:** Persons at risk for experiencing
discrimination due to their national origin
-

Share with us your insights, experiences and ideas relating to Norwalk's neighborhoods and housing discrimination and how we can improve our City!

Be part of the plan!

The City wants to hear from you as part of developing its new 5-year plan for housing and community development. We hope to see you there!

For more information, please call Kelly Robertson at 203-295-3380. This event is co-sponsored by the South Norwalk Community Center and the Norwalk Redevelopment Agency.



Focus Group: Spotlight on Housing and Community Development

(as they relate to people with disabilities)

- Date:** Tuesday, September 23, 2014
- Time:** 3:00pm—4:30pm
- Where:** STAR, Inc., 182 Wolfpit Ave, Norwalk 06851
(large conference room)
- Who:** Persons at risk for experiencing
discrimination due to their developmental,
mental or physical disability and their
families, caregivers or service providers

Share with us your insights, experiences and ideas relating to Norwalk's neighborhoods and housing discrimination and how we can improve our City!

Be part of the plan!

The City wants to hear from you as part of developing its new 5-year plan for housing and community development. We hope to see you there!

For more information, please call Peter Saverine at 203-846-9581 x302. This event is co-sponsored by STAR, Inc. and the Norwalk Redevelopment Agency.

PUBLISHER'S AFFIDAVIT

STATE OF CONNECTICUT)

ss. Norwalk

COUNTY OF FAIRFIELD)

**PUBLIC HEARING ON HOUSING AND
COMMUNITY DEVELOPMENT**

On September 23, 2014, the Norwalk Redevelopment Agency, the administrator of the City of Norwalk's Community Development Block Grant (CDBG) funds, will host a Public Hearing at 6:00pm in Norwalk City Hall, room A330, to discuss issues relating to housing and community development in Norwalk, including discrimination. This public hearing is included in the process of developing a new 5-year Consolidated Plan (for housing and community development) and work on the Analysis of Impediments (to fair housing choice) which will be submitted to the U.S. Department of Housing and Urban Development (HUD) in May, 2015. These documents will have a direct bearing on how the City chooses to allocate CDBG funding for the next five years.

Persons unable to attend the hearing are encouraged to submit written comments for the record no later than 5:00pm on September 22, 2014 to kpacchiana@norwalkct.org. City Hall room A330 is ADA accessible. Language assistance, including sign language, for this hearing may be obtained by calling (203-854-7810 ext. 46778), by emailing kpacchiana@norwalkct.org or by visiting the Redevelopment Agency's office in room 202 of City Hall. All requests must be made at least 48 hours prior to the meeting.

I, JOCELYN A. BATTISTA, being duly sworn, dispose and say:

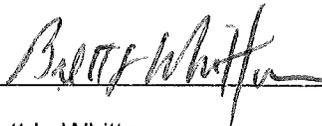
1. I am over the age of eighteen (18) and believe in the Obligation of an oath;
2. I am the Classified Advertising Supervisor of The Hour Publishing Company, publisher of the following newspapers:
 - 1) The Hour, a daily newspaper, published in Norwalk, Connecticut;
 - 2) The Wilton Villager, a weekly newspaper, published in Norwalk, Connecticut; and
 - 3) The Stamford Times, a weekly newspaper, published in Norwalk, Connecticut.

On September 15th, 2014 and September 22nd, 2014 an advertisement placed by Norwalk Redevelopment was published in The Hour newspaper.



Jocelyn A. Battista, Classified Advertising Supervisor

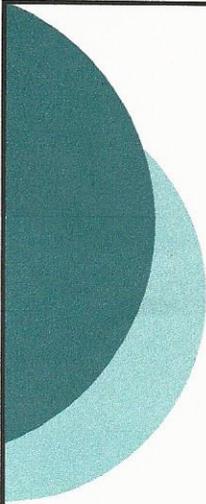
Subscribed and sworn to before me this 25th day of September, 2014.



Brett L. Whitton
Commissioner of the Superior Court

Public Hearing
23-Sep-14

- 1 *David Kennedy, United Way of Coastal Sanfield County*
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Grupo Enfoque: Los punto de Desarrollo de Vivienda en la Comunidad



Fecha: Lunes Septiembre 22, 2014

Hora: 6-7pm español

Dónde: Centro Comunitario South Norwalk, 98
South Main Street 06854

Quién: Personas en peligro de discriminación
debido a su origen nacional

Compartir con nosotros sus ideas, experiencias e ideas relacionadas con el barrio de Norwalk y discriminación en la vivienda y cómo podemos mejorar la ciudad!

Sea parte del plan!

La Ciudad quiere tener noticias de usted como la parte del desarrollo los nuevos planes de 5 años para las viviendas y el desarrollo comunitario. Esperamos contar con tu presencia!

Para obtener más información, por favor llame al 203-295-3380 Kelly Robertson. Este evento está con-patrocinado por el South Norwalk Community Center y la Agencia de Reurbanización de Norwalk.

Appendix 2 Maps

Fairfield County by CT Fair Housing Center
and Kirwin Institute 2010

Transit, Population with Limited English

Low Income

Minority

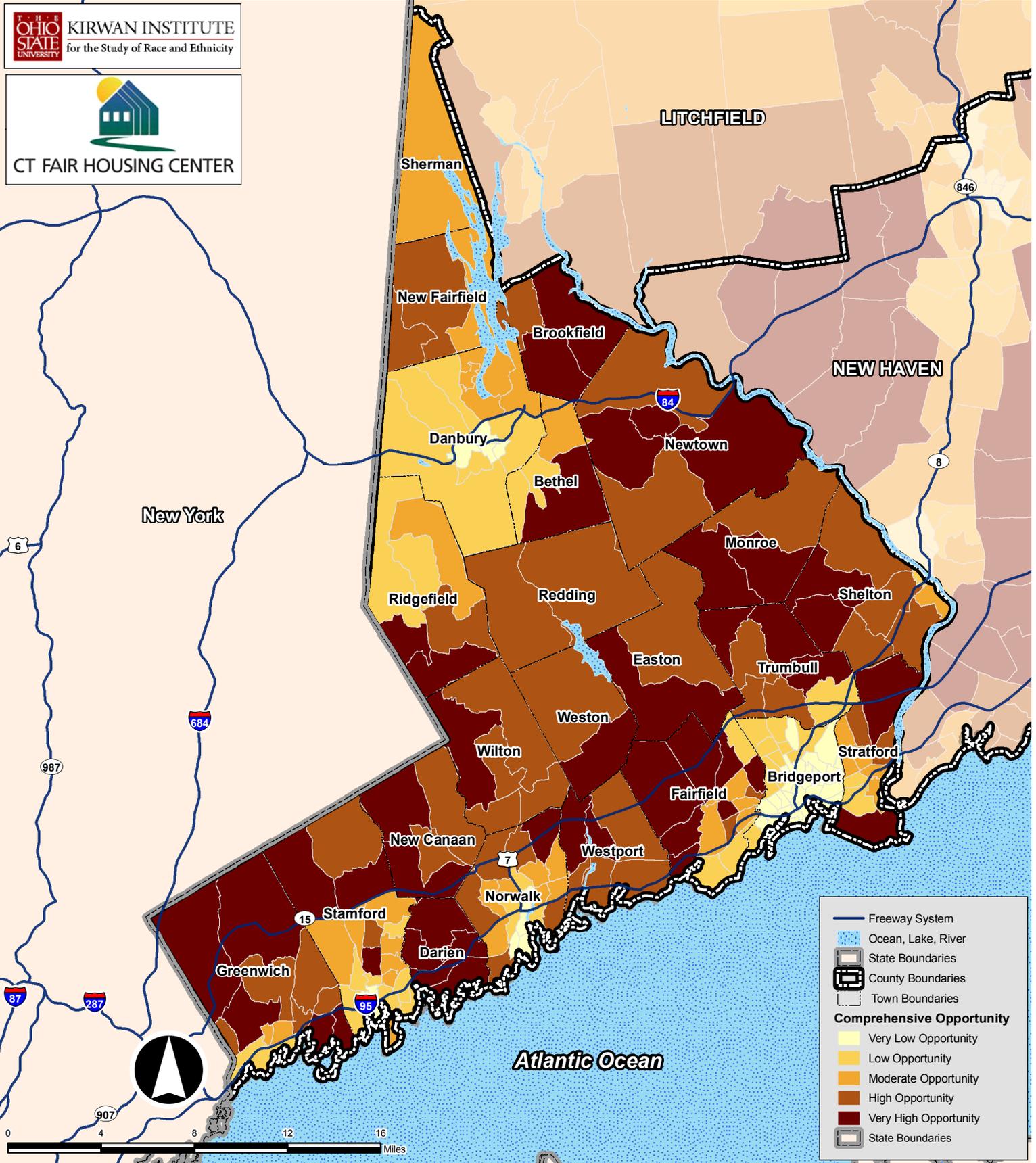
Households with Disability

Comprehensive Opportunity

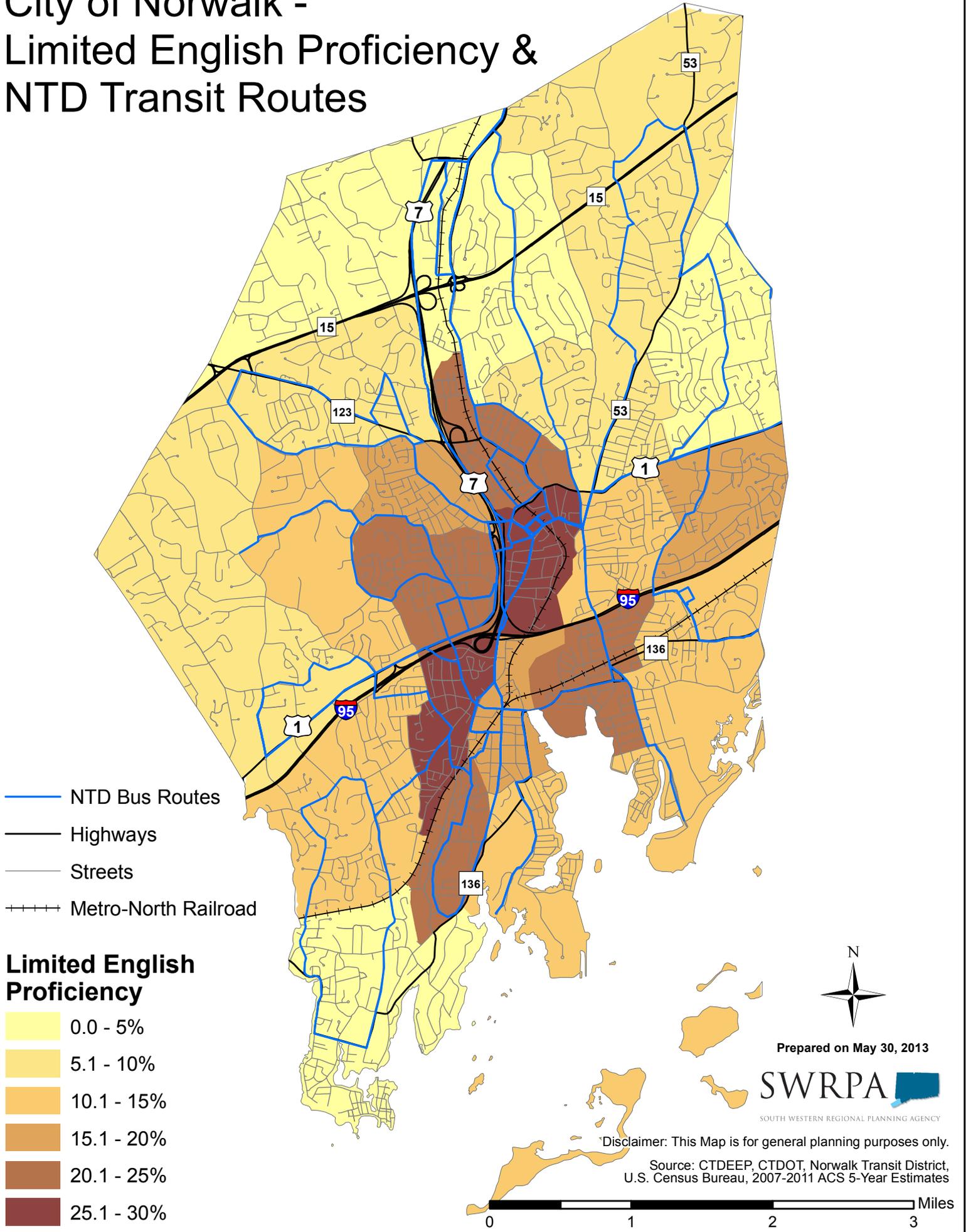
FAIRFIELD COUNTY

This map displays the spatial pattern of distribution of opportunity by census tract based on Education, Economic & Mobility, and Housing & Neighborhood indicators.

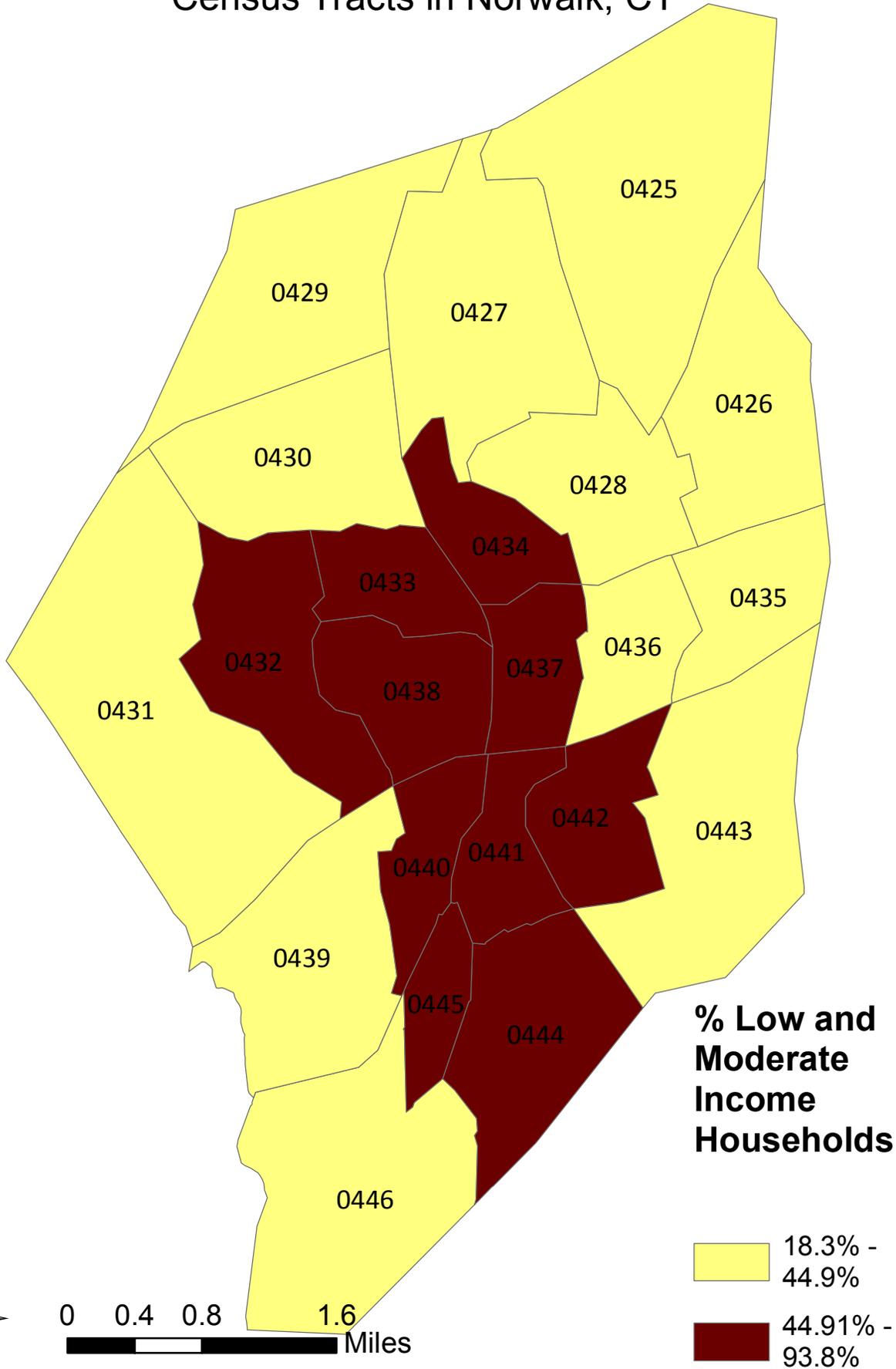
Source: US Census, CSDE, ESRI Business Analyst and MAGIC. Date: August 4, 2010



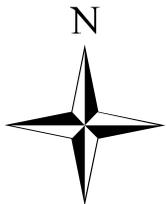
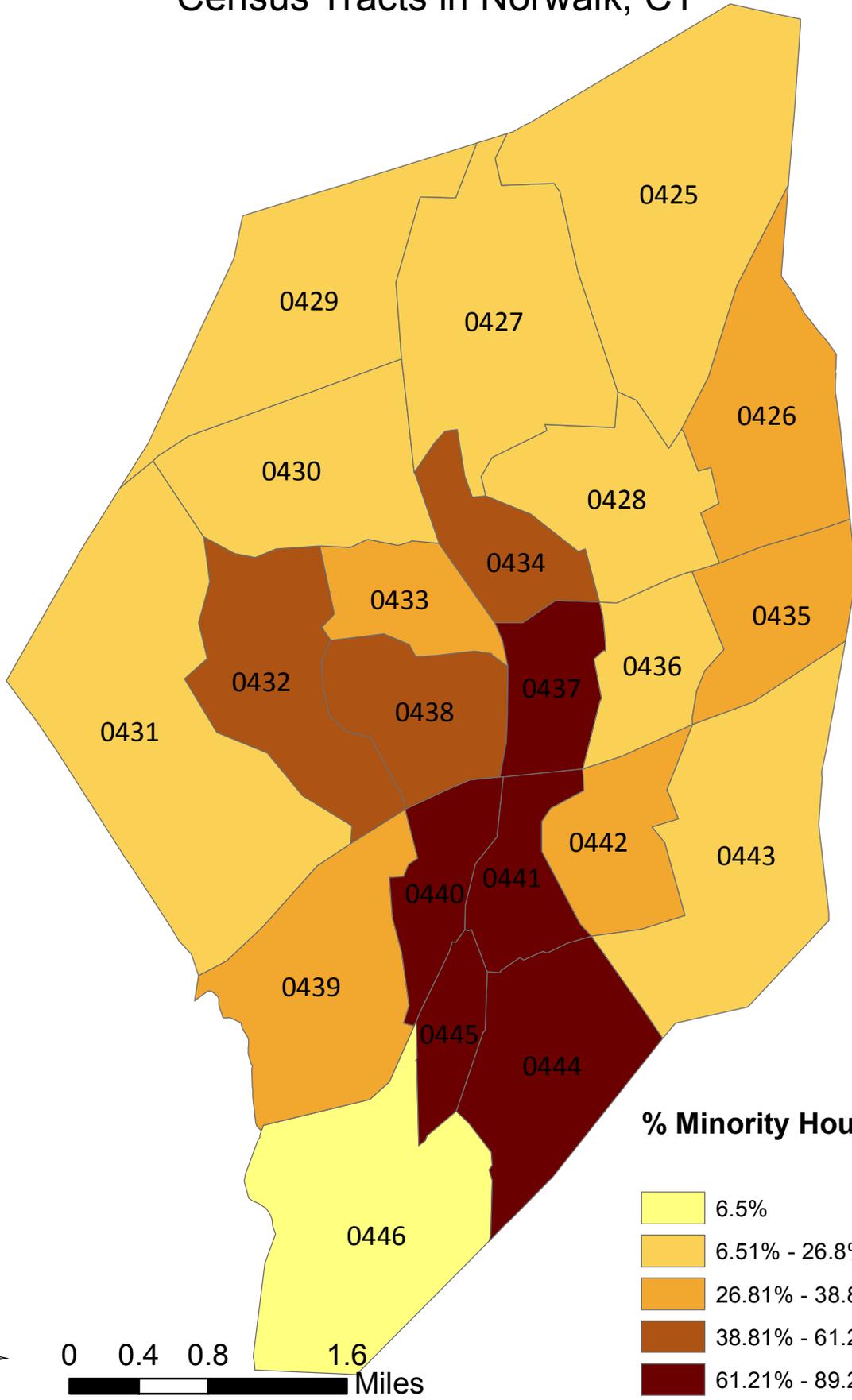
City of Norwalk - Limited English Proficiency & NTD Transit Routes



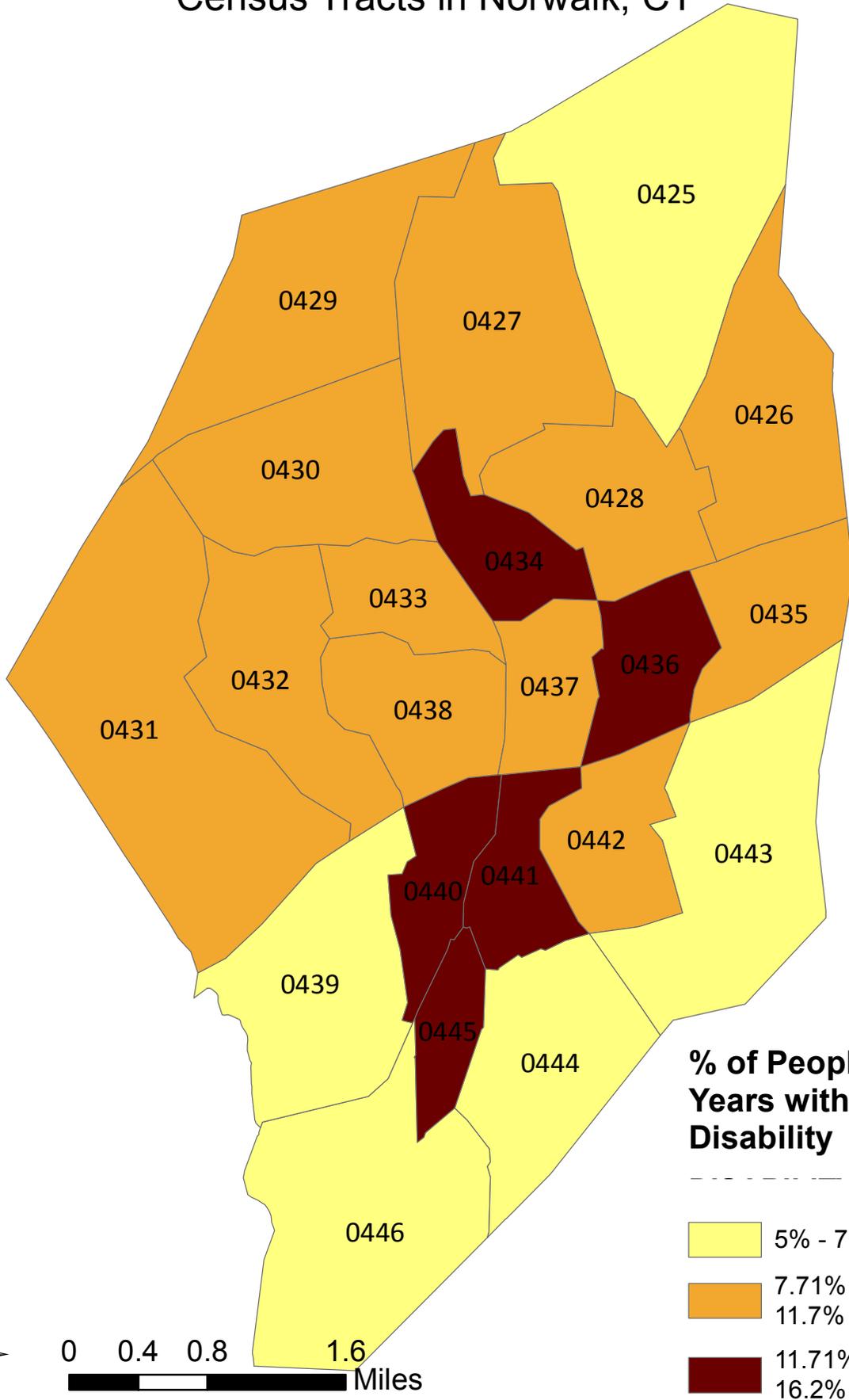
Census Tracts in Norwalk, CT



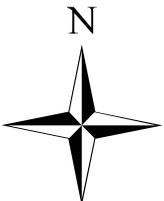
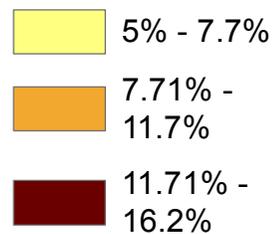
Census Tracts in Norwalk, CT



Census Tracts in Norwalk, CT



% of People >5 Years with a Disability



Appendix 3

Housing Web Sites

Fair Housing Websites

Access Living

<http://www.accessliving.org/index.php>

Access Living programs and services focus on critical issues affecting people with disabilities and the community, including housing; personal assistance and health care; youth and education; civil rights; community and economic development; and arts & culture. Their website provides news and information on housing and other concerns for persons with disabilities as well as publications about housing rights for those with disabilities.

Connecticut Commission on Human Rights and Opportunities

<http://www.ct.gov/chro/site/default.asp>

The Connecticut Commission on Human Rights and Opportunities (CHRO) is authorized by the Connecticut Human Rights and Opportunities Act (Conn. Gen. Stat. § 46a-51 et seq) to enforce human rights laws. This enforcement includes Connecticut's Discriminatory Housing Practices Act (DHPA), which prohibits discrimination in housing based on race, national origin, ancestry, creed, sex, marital status, age, familial status, disability, lawful source of income, or sexual orientation.

Connecticut's Discriminatory Housing Practices Act

[Ch 814c §§ 46a-64c; 46a-81e; Ch 127c §8-37ee](#)

Connecticut's Discriminatory Housing Practices Act (The DHPA) is the state's fair housing legislation.

Connecticut Fair Housing Center

<http://www.ctfairhousing.org/>

The Connecticut Fair Housing Center aims to ensure that all people have equal access to housing opportunities in Connecticut. Since 1994, the Connecticut Fair Housing Center has provided education and outreach on fair housing; worked in partnership with communities, developers and housing managers to promote compliance with fair housing laws; and served Connecticut residents who believe they have been the subject of housing discrimination through legal services.

The Connecticut Housing Coalition

<http://ct-housing.org/>

The Connecticut Housing Coalition was founded in 1981 to expand housing opportunity and to increase the quantity and quality of affordable housing available to people with low and moderate incomes in Connecticut through advocacy, education and collaboration. The Coalition brings together housing organizations and leaders to facilitate connections and the exchange of information, including best practices.

The Connecticut Housing Finance Authority

<http://www.chfa.org/default.aspx>

The Connecticut Housing Finance Authority (CHFA) was created in 1969 by the Connecticut Legislature as a self-supporting quasi-public housing agency charged with the purpose of expanding affordable housing opportunities for Connecticut's low- and moderate-income families and individuals. CHFA's programs address rental and homeownership housing, including homeowners at risk of foreclosure. Additionally, CHFA has partnered with state and non-profit organizations to develop group homes, supportive housing and assisted living opportunities for seniors.

Fair Housing Association of Connecticut

<http://fairhousingassociation-ct.org/>

The Fair Housing Association of Connecticut (FHACT) sponsors fair housing educational events, including the Annual FHACT Fair Housing Conference.

Fair Rent and Human Relations Commission

<http://www.norwalkct.org/index.aspx?NID=386>

The Commission provides information to landlords and tenants regarding: evictions, individual rights and responsibilities, lockouts, repairs, security deposits, utilities. Complaints may be filed by tenants for issues including: rent increases, charges for utilities, unsafe and unhealthy conditions.

The Federal Reserve Bank of Boston

<http://www.bos.frb.org/commdev/index.htm>

The Federal Reserve Bank of Boston provides information on this website about community development and consumer affairs.

Home Mortgage Disclosure Act

<http://www.ffiec.gov/HmdaAdWebReport/about.htm>

This website provides key information on Home Mortgage Disclosure Act and subsequent reporting. The text of the Home Mortgage Disclosure Act itself is on this site as well as the text of the Federal Reserve's Regulation C, which governs the reporting of HMDA data.

The Institute for Human Centered Design

<http://www.adaptenv.org/index.php?option=Home>

The Institute for Human Centered Design (formerly known as Adaptive Environments) promotes design that works for everyone across the spectrum of ability and age and enhances human experience. They have funded projects with target audiences, services and products; provided consultation to public and private entities on accessible and universal or human-centered design; and provide technical assistance and education on the topics of accessibility and design. Their website includes educational materials on these topics, as well as opportunities for training, public policy initiatives and opportunities to get involved in their work.

The John Marshall Law School Fair Housing Legal Support Center

<http://www.jmls.edu/fairhousingcenter>

The John Marshall Law School Fair Housing Legal Support Center (FHLSC) educates the public about fair housing law and provides legal assistance to private or public organizations that seek to eliminate discriminatory housing practice.

The National Community Reinvestment Coalition

www.fairlending.com

The National Community Reinvestment Coalition has a track record in fair housing testing. The Coalition is an association of more than 600 community-based organizations that promote access to banking services, work on affordable housing, job development and other community goals.

The National Fair Housing Advocate Online

<http://www.fairhousing.com>

The National Fair Housing Advocate Online is a resource designed to serve both the fair housing advocacy community and the general public with timely news and information regarding the issues of housing discrimination.

The National Fair Housing Alliance

www.nationalfairhousing.org

The National Fair Housing Alliance (NFHA) works to eliminate housing discrimination and to ensure equal housing opportunity for all people through leadership, education and outreach, membership services, public policy initiatives, advocacy and enforcement. The NFHA is a consortium of more than 220 private, non-profit fair housing organizations, state and local civil rights agencies, and individuals from throughout the United States. The NFHA produces important research and reports on fair housing.

<http://www.norwalkct.org/index.aspx?nid=1134>

The Fair Housing Advisory Commission monitors private and public housing practices for compatibility with fair housing laws and objectives, identifies problem areas and makes recommendations to the Mayor, Common Council and Housing Site Development Agency/Norwalk Redevelopment Agency and other appropriate city agencies/commissions.

The Fair Housing Officer: provides information/assistance regarding landlord/tenant laws, housing discrimination and foreclosure; investigates housing discrimination complaints and assists residents in seeking remedies; conducts educational programs and writes a quarterly newspaper column; works with Norwalk landlords and tenants, property managers and real estate professionals; and assists developers and architects of new multifamily housing as to the accessibility requirements in the Fair Housing Act.

Norwalk Fair Rent and Human Relations Commission

<http://www.norwalkct.org/index.aspx?NID=386>

The Commission provides information to landlords and tenants regarding: evictions, individual rights and responsibilities, lockouts, repairs, security deposits, utilities. Complaints may be filed by tenants for issues including: rent increases, charges for utilities, unsafe and unhealthy conditions.

Norwalk Redevelopment Agency

<http://www.norwalkredevelopmentagency.com/?q=home>

The Norwalk Redevelopment Agency (NRA) seeks to improve the physical, economic and social environment of the Norwalk Community by serving as the primary governmental organization dedicated to preserving and improving the City's housing stock and to securing and administering the resources required to carry out these goals.

The City of Norwalk and the NRA have entered into an agreement by which the NRA is the sole sub-recipient and administrator of the Community Development Block Grant Program. The NRA allocates CDBG resources in accordance with the Strategic and Annual Action Plan submitted to the U.S. Department of Housing and Community Development.

Norwalk Fair Housing Commission and Fair Housing Officer Statewide Legal Services of Connecticut

<http://slsct.org/>

The Statewide Legal Services (SLS) is part of a network of five nonprofit legal service organizations whose shared mission is provide free legal services to low-income individuals.

The Tennessee Fair Housing Council

<http://www.fairhousing.com>

The Tennessee Fair Housing Council sponsors this site which provides current fair housing news, including court cases. This web site also provides online forums and other research.

U.S. Department of Housing and Urban Development: Fair Housing

<http://www.hud.gov/offices/fheo/index.cfm>

HUD's Office of Fair Housing and Equal Opportunity is responsible for administering and enforcing federal fair housing laws. This website contains information on fair housing rights, filing a housing discrimination complaint and recent HUD activity in the area of fair housing.