City of Norwalk, CT

Analysis of Impediments to Fair Housing Choice

December 7, 2010

Prepared by:
Norwalk Redevelopment Agency
125 East Avenue
Norwalk, CT 06856-5125
203.854.7810
1) 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 those cities/communities 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 exceeds the federal statute by expanding 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 (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 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 engage in fair housing planning which includes the following:

- Preparing an Analysis of Impediments to Fair Housing Choice (AI);
- Acting to eliminate identified impediments; and
- Maintaining fair housing records.

This report represents the City's assessment of the nature and extent of fair housing concerns, and the impediments to making fair housing choice available to its residents.
The City’s last AI was completed in 2002 in conjunction with the preparation of a Five-Year Consolidated Plan for the period 2000-2004. This AI considers the changes that have occurred since the development of the previous AI.

**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**

In 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 greater incomes.

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, requires 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.

SCOPE OF ANALYSIS

This AI provides an overview of laws, regulations, conditions or other possible obstacles that may affect an individual’s or a household’s access to housing. The AI involves:

- A comprehensive review of the laws, regulations, and administrative policies, procedures, and practices;
- An assessment of how those laws, regulations, policies, procedures, and practices affect the location, availability, and accessibility of housing; and
- An assessment of conditions, both public and private, affecting fair housing choice.

Geographic Area Covered

This report constitutes the AI for the City of Norwalk, comprised of Fairfield County Census Tracts 0425.00 through 0446.00.
DATA AND METHODOLOGY

The following are key data sources used to complete this AI:

- 2000 U.S. Census and the 2006-2008 American Community Survey (ACS)
- The City’s Consolidated Plan for Housing and Community Development (Consolidated Plan)
- Comprehensive Housing Affordability Strategy (CHAS) Data from HUD
- The Norwalk Housing Authority Plan
- The Norwalk Fair Housing Advisory Commission
- The Norwalk Human Relations Commission
- The Norwalk Fair Rent Commission
- The Norwalk Fair Housing Officer
- The Connecticut Commission on Human Rights and Opportunities
- U.S. Department of Housing and Urban Development (HUD)
- Home Mortgage Disclosure Act (HMDA) Data
- The City Land Use Codes and Zoning Code
- National Association of Realtors Sales Activity Data

Sources of specific information are identified in the text, tables, and figures.

ORGANIZATION OF THE REPORT

The AI is divided into six (6) chapters:

1. Introduction: Defines “fair housing” and explains the purpose of the report.

2. Community Outreach: Describes the community outreach program that was part of the development of this report.

3. Community Profile: Presents the demographic, housing, and income characteristics in the City of Norwalk

4. Fair Housing Practices: Identifies and explains the oversight of fair housing by both government and industry organizations

5. Lending Data and Public Policies: Assesses the nature and extent of fair housing complaints and violations, examining loan data, complaints, and lending practices, and analyzing various public policies and actions that may impede fair housing within the City.

6. Conclusions and Recommendations: Summarizes AI findings regarding fair housing issues, and provides recommendations for furthering fair housing choice.
2) Community Outreach

As with the development of the Consolidated Plan, this AI results from a process of consultation and citizen participation, building upon existing participation mechanisms and venues. Citizens, not-for-profit organizations, and interested parties were afforded a variety of opportunities to:

- contribute during interviews,
- review and comment upon a draft AI, participate in a public hearing,
- comment upon the plan and its amendments, and
- register complaints about the Analysis and its amendments.

The City complied with the citizen participation guidelines as recommended by HUD in the formulation of this plan. To ensure an adequate level of public review and comment on this document the City undertook the following:

- Conducted a round of interviews with representatives from the Planning and Zoning Commission, the Norwalk Housing Authority, the Redevelopment Agency, the Fair Rent Commission, the Fair Housing Advisory Commission, and with the Fair Housing Officer;
- Made the Analysis of Impediments document available for public review and comment at multiple, publicly accessible locations throughout Norwalk;
- Presented and discussed the document at a Public Hearing of the Norwalk Redevelopment Agency; and
- Considered the views and comments of citizens, and preparing a summary of those views for consideration with the Analysis of Impediments submission.

A public hearing to review and discuss the Analysis of Impediments to Fair Housing Choice was held on April 13, 2010. This meeting received public notice and was held at the City Hall.

The draft document was then made available for public review and comment for thirty (30) days. The document was made available to the public for review at the following accessible locations:

- The Norwalk Redevelopment Agency
- The administrative offices of the Norwalk Housing Authority
- The Human Services Council, Inc.
- The Norwalk Library
- The South Norwalk Branch of the Norwalk Library and
- The administrative offices of Norwalk Economic Opportunity Now, Inc. at the South Norwalk Community Center

The City received written citizen comments during the thirty-day public review period. One such comment noted the importance of the Analysis of Impediments document in the City’s efforts to promote fair housing. An additional comment noted the difference between the requirements of the ADA laws and the goals of “visitability” and universal design expressed in the recommendations. The language in the recommendation section was changed to reflect this difference. During the April 13 hearing, one citizen did argue that the Analysis promoted the development of affordable housing, which the citizen opposed. This report however recognizes
the differences between Fair Housing and Affordable Housing on page three. The report does review the City’s efforts to maintain an adequate supply of affordable housing in the market, but does not take a position with regards to increasing the City’s current affordable inventory.

Note, the Agency then revised the Analysis of Impediments in response to comments concerning the first draft of the document. The City then released the Analysis of Impediments for a second comment period – this period extending for 60-days – that concluded on October 19, 2010. In addition to placing the revised document at multiple publicly accessible locations throughout Norwalk, the Agency transmitted the document to a variety of community stakeholders and also conducted two public information meetings. One person attended the public information meetings associated with the second comment period. All written comments received regarding the drafts of the Analysis of Impediments are included as an appendix to this document.
3) COMMUNITY PROFILE

Fair housing is concerned with ensuring that all people are treated free from illegal discrimination in the rental, sale, or occupancy of housing. This chapter examines the population, housing, and special needs characteristics and trends in the City that may affect equal housing opportunity.

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 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, and the most recent ACS data estimates a decline in population, as the table below shows:

Norwalk Population Trends, 1980 - 2008

<table>
<thead>
<tr>
<th>Year</th>
<th>Population</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>1980</td>
<td>77,767</td>
<td></td>
</tr>
<tr>
<td>1990</td>
<td>78,331</td>
<td>1.0%</td>
</tr>
<tr>
<td>2000</td>
<td>82,951</td>
<td>6.0%</td>
</tr>
<tr>
<td>2008</td>
<td>79,041</td>
<td>-5.0%</td>
</tr>
</tbody>
</table>

*Source: US Census and ACS*

Race
As seen in the table below, Norwalk’s population mirrors that of the nation very closely.

Norwalk Racial Characteristics, 2008

<table>
<thead>
<tr>
<th>RACE</th>
<th>NORWALK %</th>
<th>US %</th>
</tr>
</thead>
<tbody>
<tr>
<td>One Race</td>
<td>98.2</td>
<td>97.8</td>
</tr>
<tr>
<td>White</td>
<td>74.1</td>
<td>74.3</td>
</tr>
<tr>
<td>Black/African American</td>
<td>12.8</td>
<td>12.3</td>
</tr>
<tr>
<td>American Indian</td>
<td>0.3</td>
<td>0.8</td>
</tr>
<tr>
<td>Asian</td>
<td>4.0</td>
<td>4.4</td>
</tr>
<tr>
<td>Hawaiian/Pacific Islander</td>
<td>0.0</td>
<td>0.1</td>
</tr>
<tr>
<td>Other Race</td>
<td>7.0</td>
<td>5.8</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>1.8</td>
<td>2.2</td>
</tr>
<tr>
<td>Hispanic (Any Race)</td>
<td>23.2</td>
<td>15.1</td>
</tr>
</tbody>
</table>

*Source: US Census and ACS*

It should be noted that the Hispanic population itself is diverse; though approximately one-quarter of the Hispanic population comes from Mexico, the majority report coming from other parts of Latin America.

Native Origins
The percentage of foreign-born persons in Norwalk is almost twice that of the nation as a whole – 24.0% in Norwalk and 12.5% for the nation. However, the percentage of foreign-born persons in Norwalk entering the United States before 2000 and after that date are very close to the United States figures of 72.4% before 2000 and 27.6% after that date. Of the foreign-born population, 59.0% came from Latin America, 22.1% from Europe and 14.8% from Asia. These figures

Page 10 of 40
differ from the national statistics in that Norwalk has a higher percentage of persons from Latin America, a much higher percentage of persons from Europe, and about one-half the number of persons from Asia. This speaks to a very diverse population with an emphasis upon Hispanic and European immigration. Of the ancestries reported by the ACS, European heritages predominate – almost one-quarter of persons reported Irish or Italian, another 7.5% reported German ancestry, and English persons accounted for 6.9%.

One-third of foreign born persons reported speaking a language other than English at home, and two-thirds of these reported speaking Spanish. This compares to the national figure of 19.6% of persons reporting speaking a language other than English at home.

Thus, Norwalk has a diverse population that in many respects mirrors the United States. However, the City does have a slightly higher percentage of Hispanic and European immigrants.

The following is a list of neighborhoods 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. According to the City’s newly adopted Consolidated Plan for Housing and Community Development (effective July 1, 2010), eight (8) census tracts in Norwalk have a minority concentration of more than 30% and four (4) of these tracts have a minority population exceeding 50%. The seven (7) census tracts with the highest percentage of low-moderate income population are also the seven (7) census tracts with the highest percentage of minority population.

Table 4: Norwalk Minority Concentration by Census Tract
(From 2010-2014 Consolidated Plans)

<table>
<thead>
<tr>
<th>Norwalk Census Tract</th>
<th>% Minority 2009 Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>445</td>
<td>69.20%</td>
</tr>
<tr>
<td>444</td>
<td>64.90%</td>
</tr>
<tr>
<td>441</td>
<td>55.60%</td>
</tr>
<tr>
<td>440</td>
<td>50.10%</td>
</tr>
<tr>
<td>437</td>
<td>46.90%</td>
</tr>
<tr>
<td>434</td>
<td>45.80%</td>
</tr>
<tr>
<td>438</td>
<td>41.00%</td>
</tr>
<tr>
<td>432</td>
<td>38.20%</td>
</tr>
</tbody>
</table>

These tracts are concentrated in the urban core of the City, along the river and on either side of Interstate 95.

Sex and Age
The population of Norwalk is comprised of 52% females and 48% males. This distribution varies from the national figures of 50.7 and 49.3 respectively. The percentage of females over the age of 18 increases to 52.2%, and females over the age of 65 reaches 59.3%. These numbers indicate a high number of older women living alone; indeed, 29.7% of households in Norwalk
are persons living alone, and 7.8% of these are households 65 and older. Further, 11.1% of Norwalk households are headed by females, including 5.1% being female head of household with children under 18. These numbers are lower than the national figures.

The median age of Norwalk’s population is 38.5 years according to the ACS. This is almost two years older than the national figure of 36.7 years, but slightly lower than the state median age of 39.1.

The table below compares the age cohorts of the City with those of the state and nation.

Age by Cohort – Norwalk, Connecticut and the United States
2008

<table>
<thead>
<tr>
<th>Age</th>
<th>Norwalk %</th>
<th>Connecticut %</th>
<th>US %</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;5</td>
<td>7.9</td>
<td>6.1</td>
<td>6.9</td>
</tr>
<tr>
<td>5-9</td>
<td>5.2</td>
<td>6.3</td>
<td>6.6</td>
</tr>
<tr>
<td>10-14</td>
<td>5.6</td>
<td>6.8</td>
<td>6.8</td>
</tr>
<tr>
<td>15-19</td>
<td>5.0</td>
<td>7.2</td>
<td>7.2</td>
</tr>
<tr>
<td>20-24</td>
<td>5.8</td>
<td>6.3</td>
<td>6.9</td>
</tr>
<tr>
<td>25-34</td>
<td>13.7</td>
<td>11.5</td>
<td>13.3</td>
</tr>
<tr>
<td>35-44</td>
<td>16.9</td>
<td>15.0</td>
<td>14.3</td>
</tr>
<tr>
<td>45-54</td>
<td>15.3</td>
<td>15.9</td>
<td>14.5</td>
</tr>
<tr>
<td>55-59</td>
<td>6.9</td>
<td>6.3</td>
<td>6.0</td>
</tr>
<tr>
<td>60-64</td>
<td>5.4</td>
<td>5.1</td>
<td>4.8</td>
</tr>
<tr>
<td>65-74</td>
<td>6.6</td>
<td>6.6</td>
<td>6.5</td>
</tr>
<tr>
<td>75-84</td>
<td>4.3</td>
<td>4.7</td>
<td>4.4</td>
</tr>
<tr>
<td>85+</td>
<td>1.5</td>
<td>2.2</td>
<td>1.7</td>
</tr>
</tbody>
</table>

Source: ACS, 2008

The City population varies from that of the state and nation in several respects. The percentage of very young persons is high, though the percentage of school age children is lower than that of the state and nation, especially in high school age persons. The percentage of persons in the working age cohorts is higher, but the percentages of seniors is equal to or lower than the other areas.
Disability
The Census Bureau definition of disability will be used for this analysis, as that is the basis 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 2008 ACS data does not include data on persons with disabilities. However, the 2007 data does, and that source will be used to provide insight into the number of people in the City with disabilities. These figures indicate that 10.9% of persons age five and over had some type of disability. This amounts to over 8,000 persons in the City. Of the population age 65 and over, 34.5% reported some form of disability, which is 3,241 people.

Households
There are 19,847 family households in Norwalk according to the ACS estimates, which is 63.3% of households. Of the family households, 28.2% have children under the age of 18, a figure that is low in comparison to the United States figure of 31.0%. The average household size is 2.51 persons, slightly below the United States figure of 2.61.

The percentage of nonfamily households in the City is 36.7%, well above the national figure of 33.4% and the state’s 32.9%. The percentage of householders living alone is 29.7% for the City, compared to 27.5% for the US and 27.2% for the state.

The percentage of households headed by females is 11.1%, below the national figure of 12.5%, and the percentage of these households with children is two percentage points lower than that of the nation.

Data provided by HUD in the Comprehensive Housing Affordability Strategy (CHAS) database, based upon 2008 ACS data, indicates that there are 2,580 large households (5 or more persons) living in Norwalk. This is 8.0% of total households.

ECONOMIC DATA

Educational Attainment
Though not directly related to discrimination, educational attainment statistics are an important gauge of an area’s workforce and economic development potential, and the economic strength of an area. The table that follows shows that 6.4% of Norwalk residents never graduated from high school, and 24.6% graduated from high school but did no pursue higher education. The percentage of people with a bachelor’s degree (24.0%) is above state and national percentages. The percentage of graduate and professional degrees is well above the national figure and only slightly below the state figure. This level of attainment influences the types of jobs and the types of businesses that the City can expect to retain or recruit and this, in turn, affects the income levels of City residents. The statistics provided by the ACS do not provide insight into the age of persons in the various categories. For example, the number of older persons lacking a high school diploma, as opposed to young adults, cannot be determined from the data provided.
Educational Attainment Levels, Norwalk, Connecticut, and the US
2008

<table>
<thead>
<tr>
<th>Attainment Level</th>
<th>Norwalk %</th>
<th>Connecticut %</th>
<th>US %</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 9th grade</td>
<td>6.4</td>
<td>4.7</td>
<td>6.4</td>
</tr>
<tr>
<td>9th to 12th grade, no diploma</td>
<td>8.5</td>
<td>7.1</td>
<td>9.1</td>
</tr>
<tr>
<td>HS Graduate</td>
<td>24.6</td>
<td>28.9</td>
<td>29.6</td>
</tr>
<tr>
<td>Some College, No Degree</td>
<td>14.7</td>
<td>17.1</td>
<td>20.1</td>
</tr>
<tr>
<td>Associate's Degree</td>
<td>7.9</td>
<td>7.4</td>
<td>7.4</td>
</tr>
<tr>
<td>Bachelor's Degree</td>
<td>24.0</td>
<td>19.7</td>
<td>17.3</td>
</tr>
<tr>
<td>Graduate or Professional Degree</td>
<td>14.0</td>
<td>15.1</td>
<td>10.1</td>
</tr>
</tbody>
</table>

Source: ACS, 2008

Occupations
The higher education levels noted above are reflected in the types of occupations found among the City’s residents. The 38.6% of residents in management and professional occupations is above the national percentage (34.5%), while service occupations are a slightly higher percentage than the national figure (26.5% in Norwalk vs. 25.6% United States). Norwalk has a significantly lower percentage of workers in production, and transportation than the US and Connecticut percentages, indicating the City’s transition from the traditional economy of the twentieth century (7.3% Norwalk; 12.7% United States; 10.3% CT).

The table below shows the percentage of Norwalk workers in the major industries compared to the percentages in those industries nationwide. Though the largest employment is in the healthcare and education industry category, that category is not as large a percentage as the national figure. Both the professional-scientific and FIRE (Finance, Insurance, and Real Estate) sectors are well above the national norm. Retail has a significant presence and the percentage of retail workers is slightly higher than the United States figure.

Norwalk Employees, Number and % of Workforce
2008

<table>
<thead>
<tr>
<th>INDUSTRY</th>
<th># of Employees</th>
<th>% of Norwalk Workforce</th>
<th>% of US Workforce</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture-Forestry-Mining</td>
<td>83</td>
<td>0.2</td>
<td>1.8</td>
</tr>
<tr>
<td>Construction</td>
<td>3,739</td>
<td>8.6</td>
<td>7.7</td>
</tr>
<tr>
<td>Manufacturing</td>
<td>3,897</td>
<td>9.0</td>
<td>11.3</td>
</tr>
<tr>
<td>Wholesale</td>
<td>972</td>
<td>2.2</td>
<td>3.2</td>
</tr>
<tr>
<td>Retail</td>
<td>5,271</td>
<td>12.2</td>
<td>11.5</td>
</tr>
<tr>
<td>Transportation-Utilities</td>
<td>1,295</td>
<td>3.0</td>
<td>5.1</td>
</tr>
<tr>
<td>Information</td>
<td>1,783</td>
<td>4.1</td>
<td>2.5</td>
</tr>
<tr>
<td>FIRE</td>
<td>5,107</td>
<td>11.8</td>
<td>7.1</td>
</tr>
<tr>
<td>Professional-Scientific</td>
<td>7,506</td>
<td>17.3</td>
<td>10.3</td>
</tr>
<tr>
<td>------------------------</td>
<td>-------</td>
<td>------</td>
<td>------</td>
</tr>
<tr>
<td>Education-Health Care</td>
<td>7,507</td>
<td>17.6</td>
<td>21.3</td>
</tr>
<tr>
<td>Art-Entertainment-</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accommodation-Food</td>
<td>3,268</td>
<td>7.6</td>
<td>8.7</td>
</tr>
<tr>
<td>Service</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Service</td>
<td>2,090</td>
<td>4.8</td>
<td>4.8</td>
</tr>
<tr>
<td>Public Administration</td>
<td>73</td>
<td>1.7</td>
<td>4.7</td>
</tr>
</tbody>
</table>

Source: ACS, 2008

It should be noted that 82.5% of workers were private sector wage earners, compared to 78.7% across the nation, and 9.3% of Norwalk workers were self-employed, compared to 6.6% nationwide.

**Income and Poverty**

The strength of the professional-scientific and FIRE sectors provides the City with relatively high-income levels. The median household income (MHI) was $76,358 in 2008 and the per capita income (PCI) was $43,752. These figures compare to $52,175 for the United States MHI and $27,460 for the United States PCI.

According to the ACS figures, 6.9% of the City population had incomes that fell below the poverty level over the preceding twelve months. This compares to 13.2% for the United States and 8.5% for Connecticut.

HUD has provided detailed data as part of its CHAS materials. This data will be examined in more detail in other sections of the Plan, especially the Housing Needs Assessment. However, the data does provide an overview of the economic structure of the City's households. In creating the CHAS materials HUD established five income categories for their analysis. The five income ranges are:

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

The table below shows the distribution of Extremely Low-, Very Low-, Low- and Moderate-income households in the City based upon this data. The 2009 Median Income figure for a family of four in the Stamford-Norwalk MSA, calculated by HUD, is $122,300.
By these definitions, 32.0% of Norwalk households are in the low-income categories.

However, one of the concerns noted in the Consolidated Plan is the concentration of low-income households. Identifying concentrations of low-income households and racial and ethnic minorities is helpful in identifying possible patterns of discrimination. The HUD definition of an area of low-income concentration is a census tract in which the number of low-income households (defined as households earning 50% or less of the median income) exceeds 50% of the total number of households. The threshold for an area defined as highly concentrated is 75% or more of the census tract occupied by low-income households.

The City’s newly adopted Consolidated Plan identifies seven (7) low-and-moderate income census tracts (listed below):

Table 3: HUD Defined Low Mod percentages by Census Tract (2010-2014 Consolidated Plan)

<table>
<thead>
<tr>
<th>Census Tracts</th>
<th>Percentage of Low/Mod Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>0441</td>
<td>75.24%</td>
</tr>
<tr>
<td>0445</td>
<td>69.74%</td>
</tr>
<tr>
<td>0437</td>
<td>67.19%</td>
</tr>
<tr>
<td>0440</td>
<td>65.48%</td>
</tr>
<tr>
<td>0434</td>
<td>54.93%</td>
</tr>
<tr>
<td>0438</td>
<td>54.58%</td>
</tr>
<tr>
<td>0444</td>
<td>53.11%</td>
</tr>
</tbody>
</table>

These are the same census tracts with concentrations of minority residents. While not all of the tracts have a minority population of 50% or more, the concentration of lower-income and minority persons is clear. While discrimination can occur at any level these particular tracts are significant because of their concentrations of both poverty and minority populations which have historically been targets of discriminatory actions and thus these areas should be closely examined by the City for evidence of such.
HOUSING DATA

Fair housing is concerned with the availability of a range of types and prices of housing. To understand fair housing choice comprehensively, an assessment of the housing market is important. This section provides an overview of the housing market in Norwalk.

The following paragraphs 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, conditions, 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. The primary source of data for this analysis is the U.S. Census 2008 ACS.

Housing Inventory
According to ACS figures, the City's total housing inventory in 2008 was 34,619 units. Of these 31,343 were occupied and 3,276 were vacant. This total figure represents an increase of 866 units (3%) since 2000. Though the total number of units has increased since 2000, the number of occupied units has decreased, and there are now actually fewer occupied units than in 2000 — 32,711 units occupied in 2000 compared to 31,343 in 2008.

Tenure
There are 20,136 owner-occupied units representing 64.2% of the occupied units in Norwalk, a decline of about 150 occupied units since 2000. Nationally, 67.1% of housing units are owner-occupied.

Rental units in Norwalk constitute 11,207 units or 35.8% of occupied units, a figure higher than the national figure of 32.9%, but in keeping with the urban nature of the City and the area.

Age and Condition
As with most built-out urban areas, the housing stock in Norwalk is older, and this fact presents a number of issues that may affect fair housing choice.

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 (27,590) and percentage of units (80%) constructed prior to 1978 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. Nearly 52% of all housing units in Norwalk were constructed prior to 1960 and could harbor lead paint hazards, if the paint is in poor condition or improper renovation occurred. 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). Four of these Census tracts (Tracts 441, 442, 444 and 445) are among the six Census Tracts with the highest number and densest concentration of children under seven years of age, according to the 2000 census figures.
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 already identified as likely 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
Norwalk is located in one of the most expensive real estate markets in the nation. Data from the ACS indicates that the 2008 median home value was $516,200, and that only 225 owner occupied houses (of a total 20,136 units) were valued at less than $100,000, while there were 1,784 units valued at over $1,000,000. In 2008, housing prices in Norwalk declined and sales volumes slowed markedly. Despite the significant decline in price, recent figures from the National Association of Realtors show that housing prices remain high in Norwalk. Indeed, one real estate service (Trulia.com) notes that the number of house sales in Norwalk has increased 3.8% recently and the sales prices have increased by a modest 0.3% even during the recession. The table below shows the median sales price and sales activity for various sized units.

### Existing Single-Family Residential Sales Activity
**City of Norwalk, CT**  
**July 2009-December 2009**

<table>
<thead>
<tr>
<th>Bedrooms</th>
<th># Sales</th>
<th>Median Sales Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-Bedroom</td>
<td>31</td>
<td>$358,000</td>
</tr>
<tr>
<td>3-Bedroom</td>
<td>121</td>
<td>$438,000</td>
</tr>
<tr>
<td>4-Bedroom</td>
<td>55</td>
<td>$488,000</td>
</tr>
</tbody>
</table>


Condominium sales and prices did not decline as markedly as home prices in 2008, and sales have remained steady and prices higher in recent months, as the following table shows.

### Existing Condominium/Townhome Sales Activity
**City of Norwalk, CT**  
**July 2009-December 2009**

<table>
<thead>
<tr>
<th>Bedrooms</th>
<th># Sales</th>
<th>Median Sales Price</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-Bedroom</td>
<td>10</td>
<td>$229,000</td>
</tr>
<tr>
<td>3-Bedroom</td>
<td>22</td>
<td>$306,000</td>
</tr>
<tr>
<td>4-Bedroom</td>
<td>8</td>
<td>$360,000</td>
</tr>
</tbody>
</table>


By way of comparison, 2004 figures for condo sales indicate a median sales price of $275,000.
Foreclosure activity has been modest but consistent in Norwalk in the past six months, and does not appear to have affected home prices. The number of homes in some stage of foreclosure has been consistent, as shown below.

### Home Foreclosure Activity
**Norwalk, CT, May, 2009-January, 2010**

<table>
<thead>
<tr>
<th>Month</th>
<th>Pre-Foreclosures</th>
<th>Auctions</th>
<th>REOs</th>
<th>Total Foreclosure Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug-09</td>
<td>59</td>
<td>3</td>
<td>4</td>
<td>66</td>
</tr>
<tr>
<td>Sep-09</td>
<td>36</td>
<td>4</td>
<td>12</td>
<td>52</td>
</tr>
<tr>
<td>Oct-09</td>
<td>42</td>
<td>3</td>
<td>13</td>
<td>58</td>
</tr>
<tr>
<td>Nov-09</td>
<td>47</td>
<td>0</td>
<td>11</td>
<td>58</td>
</tr>
<tr>
<td>Dec-09</td>
<td>44</td>
<td>0</td>
<td>12</td>
<td>56</td>
</tr>
<tr>
<td>Jan-10</td>
<td>45</td>
<td>1</td>
<td>18</td>
<td>64*</td>
</tr>
</tbody>
</table>

*1 in every 543 housing units received a foreclosure filing in January 2010.
Source: RealtyTrac, January 2010

While the number of homes in pre-foreclosure activity has been consistent, the number of Real Estate Owned (REO) units has increased, indicating that the banks are taking possession of the distressed properties. The City’s foreclosure rate (0.18%) is slightly higher than the rates for Fairfield County, 0.17%, and 0.15% for the state. The United States rate is 0.25%. Though the foreclosure rate is relatively low, the City should consider whether improper lending practices have been employed or whether any protected classes are disproportionately affected.

The situation with respect to rental costs is very difficult for low-income households. The Fair Market Rent, calculated by HUD, and used by the National Low Income Housing Coalition for its analyses, is now $1,703 per month for a two-bedroom unit in Norwalk. This figure is $600 per month higher than the state average for the same unit, and reflects a 44% increase since the year 2000. Inflation over the same period was only about 25%, and it is recognized that wages have not kept up with inflation for the past decade or more. Thus, rental housing costs are consuming an increasing portion of income.

**Housing Need and Affordability**

A basic premise of all housing markets is 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.

Local housing and labor markets are inextricably linked to one another. Industries are served by local housing markets that provide choices and opportunities for both current and future workers. The level of affordable housing demand is largely determined by job growth and retention. Employment growth will occur through the retention and expansion of existing firms and new
economic growth resulting from start-ups, spin-offs, and relocations to Norwalk. Populations follow job growth and the demand for housing will be influenced by the location, type, and wage levels of the City’s future employment growth. The affordability component of housing demand, however, is based on local wages and salaries that are then translated into household incomes. Therefore, the availability of an existing supply of various housing types and price levels must be maintained to address the housing demand of the variety of occupations that comprise the local industrial base.

Currently, 47.7% of the City’s owner households are now paying in excess of 30 % of their incomes on housing costs. This represents households living in 7,270 owner occupied units in the City. The median owner cost per month, per the ACS data, was $2,698. According to the CHAS data, 8,235 owner households were cost burdened, and of those 3,580 were severely cost burdened. The ACS data for 2008 corroborate this, showing that 38.9% of owners are severely cost burdened.

The level of cost-burdened renter households is 55.2% of the total population, and the median rent was $1,261 per month in 2008. Among renter households, the CHAS data indicates that 5,720 households were cost burdened and that 2,526 (44.0%) were severely cost burdened.

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.

Public Housing Authority
As stated in its mission, 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 administers 1,131 units of public housing located within sixteen (16) public housing complexes: 790 of these units are reserved for family housing and the balance of these units, 341, are reserved for the elderly. According to the NHA’s comprehensive 5-Year Plan for 2005-2009, 951 households were on the waiting list for public housing. Waiting lists at all but two (2) Norwalk Housing Authority administered developments are open. The turnover for calendar year 2009 was 128 units.

Patterns of occupancy and turnover within the 1,131 public housing units owned and operated by the Norwalk Housing Authority illustrate the short supply of affordable housing. Overall, the Housing Authority reports an 11% turnover rate within its housing units each year. This turnover rate, however, does not exclusively reflect movement out of public housing. It also reflects the movement from one unit of public housing to another that occurs when existing occupants are relocated to units more appropriately matching their family size and composition. As a result, the new placement rate is lower than the unit turnover rate. Housing Authority waiting lists for senior and handicap-accessible housing units are open. Average wait for these units is 6 to 12 months.

The Norwalk Housing Authority also administers project and tenant-based Section 8 certificates. A total of 898 certificates are currently in use and an additional 537 applicants are on the waiting
list for Section 8 assistance. Like the waiting list for public housing, the waiting list for Section 8 assistance is currently closed.

**OBSERVATIONS**

Several key points relevant to potential impediments to fair housing emerge from the preceding information.

1. Approximately 10% of the City's population age five (5) and above face some type of disability.

2. A substantial number of those Census Tracts that have the highest percentage of minority concentration are also home to the highest concentration of the City's low-and-moderate income residents.

3. A substantial portion (47.7%) of Norwalk households are housing cost burdened, expending in excess of 30% of their income to meet housing costs.

4. The City of Norwalk is an ethnically and culturally diverse community.
4) FAIR HOUSING 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.

OVERSIGHT ORGANIZATIONS

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.

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. Finally, Norwalk
residents may file a complaint with Norwalk’s Human Relations Commission. Each of these
choices for filing a claim or lawsuit has different time requirements (statutes of limitations).
Norwalk’s Fair Housing Officer, the position charged with investigating complaints of housing
discrimination in Norwalk, then assists residents in considering these various options for
enforcement and pursuing their claims.

As noted above, there are a number of avenues a person can take to file a complaint. Persons
who feel that they have been discriminated against may file a complaint with the CHRO.
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.

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 can hear cases of housing discrimination based on the refusal to sell, rent, advertise, or show housing or in the terms, conditions, or privileges in the sale or rental of housing based on a prospective tenant's or buyer's membership in the following protected classes: race, creed, color, national origin, ancestry, sex, marital status, age, lawful source of income, familial status, learning disability, or physical or mental disability or based on the association of the prospective buyer or renter or their household member with anyone with a learning disability or physical or mental disability. 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.

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. 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.
FAIR HOUSING ORGANIZATIONS

In addition, there are a number of not-for-profit organizations concerned with fair housing issues. These organizations assist individuals who feel that they may have been the subject of discriminatory acts.

The Connecticut Fair Housing Center is a statewide non-profit organization dedicated to assisting low-income persons with housing problems. During the last four years, in response to a growing number of calls from communities of color complaining of predatory lending and foreclosure issues, the Center broadened its fair housing mission to include a range of foreclosure prevention efforts.

The Fair Housing Association of Connecticut, Inc. is a 501(c) (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 works 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.

The resources and expertise of these organizations can be called upon to further fair housing and further collaboration and coordination with them can provide additional resource and expertise.

5) LENDING DATA AND PUBLIC POLICIES

This section of the AI evaluates lending practices in Norwalk, using Home Mortgage Disclosure Act (HMDA) data, information from banking oversight agencies, and complaint data from local, state, and federal organizations and agencies.

At the same time, public policies established at the local level can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation. An assessment of public policies and practices enacted by the City can help determine potential impediments to fair housing opportunity. To identify potential impediments to fair housing choice, housing-related documents (e.g., zoning code materials, previous fair housing assessments) were reviewed, and interviews with fair housing advocates and practitioners were conducted in preparing this AI.

HOME LOAN ACTIVITY

Background
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. HMDA data were evaluated in this AI with respect to lending patterns.

Two (2) types of financing – conventional and government-backed – are 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. HMDA data lack the detailed information on loan terms or specific reasons for denial to make conclusive statements.

**Loan Activity**

In 2008, the most recent year for which complete data is available, only 3,877 loans were originated in the twenty-two census tracts that comprise the City of Norwalk. The table below shows the total number of loans applied for, the numbers of loans originated, and the number denied as well as the results of other actions. It is interesting to note that the number of refinancing loans is twice the number of home purchase loans – 1,162 home purchase versus 2,343 refinancing loans.
City of Norwalk  
Disposition of Loan Applications, 2008

<table>
<thead>
<tr>
<th></th>
<th>FHA/ERS/RHS &amp; VA (Purchase)</th>
<th>Conventional (Purchase)</th>
<th>Refinancing</th>
<th>Home Improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>% of Total Apps</td>
<td>% of Total Apps</td>
<td>% of Total Apps</td>
<td>% of Total Apps</td>
</tr>
<tr>
<td>Loans Originated</td>
<td>#</td>
<td>72</td>
<td>57.1%</td>
<td>664</td>
</tr>
<tr>
<td>Approved, Not Accepted</td>
<td>6</td>
<td>4.8%</td>
<td>93</td>
<td>9.0%</td>
</tr>
<tr>
<td>Applications Denied</td>
<td>26</td>
<td>20.6%</td>
<td>156</td>
<td>15.1%</td>
</tr>
<tr>
<td>Applications Withdrawn</td>
<td>20</td>
<td>15.9%</td>
<td>102</td>
<td>9.8%</td>
</tr>
<tr>
<td>File Closed for Incompleteness</td>
<td>2</td>
<td>1.6%</td>
<td>21</td>
<td>2.0%</td>
</tr>
<tr>
<td>APPLICATIONS TOTAL</td>
<td>126</td>
<td>1036</td>
<td>2343</td>
<td>372</td>
</tr>
</tbody>
</table>

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

These figures are for the entire City, and show that while the majority of home purchase loans were approved, 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. The lack of lender assistance may be discriminatory in motive or outcome. However, HMDA data are inadequate in proving motive.

The rate of denials for refinancing is high, over one-third of applications, as is the figure for applications withdrawn. The topic is often a complicated one for the borrower and the rate of withdrawal may reflect this fact.

A review of lending data shows 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 incomes level
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 these figures are 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.
Stamford-Norwalk MSA  
Disposition of Loan Applications by Race/Ethnicity, 2008  
(Home Purchase, Refinance, and Home Improvement Loans)

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

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

The following table examines the same loan data, but from the perspective of the income levels of the applicants. The 120%+ applicant group was by far the largest, more than twice the number of the second largest group, the 50 to 79% of Median Household Income group. As is typically the case, the rate of loan denial rate decreased as income level increased. The percentage of loan withdrawal was consistent across all income levels centering in the 20% range.
Stamford-Norwalk MSA
Disposition of Loan Applications by Income Level, 2008
(Home Purchase, Refinance, and Home Improvement Loans)

<table>
<thead>
<tr>
<th>Income of Applicant</th>
<th># of Loan Applications</th>
<th># of Loans Originated</th>
<th># of Loan Denials</th>
<th>% of Loans Denied</th>
<th># Withdrawn, Not Accepted, Closed, or Incomplete</th>
<th>% Withdrawn, Not Accepted, Closed, or Incomplete</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt; 50% of MHI</td>
<td>3,341</td>
<td>1,154</td>
<td>1,531</td>
<td>45.8%</td>
<td>656</td>
<td>19.6%</td>
</tr>
<tr>
<td>50-79% MHI</td>
<td>7,727</td>
<td>3,472</td>
<td>2,499</td>
<td>32.3%</td>
<td>1,756</td>
<td>22.7%</td>
</tr>
<tr>
<td>80-99% MHI</td>
<td>5,202</td>
<td>2,343</td>
<td>1,702</td>
<td>32.7%</td>
<td>1,157</td>
<td>22.2%</td>
</tr>
<tr>
<td>100-119% MHI</td>
<td>3,690</td>
<td>1,949</td>
<td>967</td>
<td>26.2%</td>
<td>774</td>
<td>21.0%</td>
</tr>
<tr>
<td>120+% of MHI</td>
<td>17,442</td>
<td>10,240</td>
<td>3,676</td>
<td>21.1%</td>
<td>3,526</td>
<td>20.2%</td>
</tr>
</tbody>
</table>

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 no 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.

Page 30 of 40
# Stamford-Norwalk MSA

**Reasons for Loan Denial by Race and Ethnicity, 2008**

(Home Purchase, Refinance, and Home Improvement Loans)

<table>
<thead>
<tr>
<th>Race/Ethnicity</th>
<th>Debt/Income Ratio</th>
<th>Employment History</th>
<th>Credit History</th>
<th>Collateral</th>
<th>Insufficient Cash</th>
<th>Under Collateral Information</th>
<th>Credit App. Incomplete</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian/Alaskan</td>
<td>Native</td>
<td>8</td>
<td>19.5%</td>
<td>3</td>
<td>7.9%</td>
<td>19.5%</td>
<td>45.9%</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Asian</td>
<td>58</td>
<td>20.6%</td>
<td>7</td>
<td>2.4%</td>
<td>18.5%</td>
<td>27.9%</td>
<td>10</td>
</tr>
<tr>
<td>Black or African-American</td>
<td>Native</td>
<td>266</td>
<td>24.2%</td>
<td>7</td>
<td>0.6%</td>
<td>32.1%</td>
<td>25.7%</td>
<td>41</td>
</tr>
<tr>
<td></td>
<td>Hawaiian or Pacific Islander</td>
<td>22</td>
<td>11.0%</td>
<td>0</td>
<td>0.0%</td>
<td>15.5%</td>
<td>10.5%</td>
<td>1</td>
</tr>
<tr>
<td>White</td>
<td>3,545</td>
<td>25.2%</td>
<td>79</td>
<td>1.9%</td>
<td>1.9%</td>
<td>1.486</td>
<td>24.1%</td>
<td>181</td>
</tr>
<tr>
<td>Two or More Minority Races</td>
<td>4</td>
<td>44.4%</td>
<td>0</td>
<td>0.0%</td>
<td>33.3%</td>
<td>11.1%</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Joint (White/Minority Race)</td>
<td>18</td>
<td>20.9%</td>
<td>0</td>
<td>0.0%</td>
<td>20.9%</td>
<td>23.3%</td>
<td>22.6%</td>
<td>3</td>
</tr>
<tr>
<td>Race Not Available</td>
<td>396</td>
<td>24.1%</td>
<td>12</td>
<td>0.7%</td>
<td>20.3%</td>
<td>20.0%</td>
<td>22.0%</td>
<td>47</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>466</td>
<td>21.8%</td>
<td>24</td>
<td>1.1%</td>
<td>15.8%</td>
<td>20.3%</td>
<td>44.4%</td>
<td>45</td>
</tr>
<tr>
<td>Not Hispanic or Latino</td>
<td>1,457</td>
<td>25.2%</td>
<td>1</td>
<td>0.6%</td>
<td>25.2%</td>
<td>20.5%</td>
<td>1.5%</td>
<td>182</td>
</tr>
<tr>
<td>Joint Hispanic or Latino</td>
<td>28</td>
<td>20.9%</td>
<td>1</td>
<td>0.7%</td>
<td>18.7%</td>
<td>20.0%</td>
<td>30.6%</td>
<td>3</td>
</tr>
<tr>
<td>Ethnicity Not Available</td>
<td>355</td>
<td>22.0%</td>
<td>12</td>
<td>0.8%</td>
<td>22.0%</td>
<td>21.0%</td>
<td>21.0%</td>
<td>42</td>
</tr>
</tbody>
</table>

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

## PERFORMANCE BY LENDER

**Lenders Making the Most Loans in Norwalk**
The top lenders in terms of number of loans made in the Stamford-Norwalk MSA in 2008 were the following:

- JPMorgan Chase Bank, N.A
- Bank of America, N.A.
- CitiMortgage, Inc., NY
- People's United Bank
- Newtown Savings Bank
- William Ravesis Mortgage, LLC, CT
- Union Savings Bank, CT
- Fairfield County Bank, CT
- Newalliance Bank
- HSBC Mortgage, NY
- Webster Bank, N.A.
- Connecticut Home Mortgage

Page 31 of 40
The following table shows these institutions ranked by the number of conventional loan applications each handled in 2008, along with the approval rate for each.

**Disposition of Conventional Home Loan Applications by Lending Institution**  
**Bridgeport-Stamford-Norwalk, CT MSA: 2008**

<table>
<thead>
<tr>
<th>Lender Name</th>
<th>Loans Originated</th>
<th>Approved</th>
<th>Denied</th>
<th>Withdrawn/Closed</th>
</tr>
</thead>
<tbody>
<tr>
<td>JPMorgan Chase Bank, N.A</td>
<td>1,425</td>
<td>59  4%</td>
<td>874  61%</td>
<td>130  9%</td>
</tr>
<tr>
<td>Bank of America, N.A.</td>
<td>1,024</td>
<td>167 16%</td>
<td>532  52%</td>
<td>241 24%</td>
</tr>
<tr>
<td>CitiMortgage, Inc., NY</td>
<td>869</td>
<td>60  7%</td>
<td>281  32%</td>
<td>354 41%</td>
</tr>
<tr>
<td>People's United Bank</td>
<td>628</td>
<td>104 17%</td>
<td>232  37%</td>
<td>129 21%</td>
</tr>
<tr>
<td>Newtown Savings Bank</td>
<td>455</td>
<td>23  5%</td>
<td>46   10%</td>
<td>56  12%</td>
</tr>
<tr>
<td>William Raveis Mortgage, LLC, CT</td>
<td>304</td>
<td>1   1%</td>
<td>17   6%</td>
<td>40 13%</td>
</tr>
<tr>
<td>Union Savings Bank, CT</td>
<td>301</td>
<td>13  4%</td>
<td>31   10%</td>
<td>40 13%</td>
</tr>
<tr>
<td>Fairfield County Bank, CT</td>
<td>264</td>
<td>9   3%</td>
<td>41   16%</td>
<td>52 20%</td>
</tr>
<tr>
<td>Newalliance Bank</td>
<td>253</td>
<td>19  8%</td>
<td>66   26%</td>
<td>48 19%</td>
</tr>
<tr>
<td>HSBC Mortgage, NY</td>
<td>247</td>
<td>90  36%</td>
<td>50   20%</td>
<td>110 44%</td>
</tr>
<tr>
<td>Webster Bank, N.A.</td>
<td>218</td>
<td>49  22%</td>
<td>130  60%</td>
<td>54 24%</td>
</tr>
<tr>
<td>Connecticut Home Mortgage</td>
<td>212</td>
<td>2   1%</td>
<td>8    4%</td>
<td>32 15%</td>
</tr>
<tr>
<td><strong>MSA Total</strong></td>
<td><strong>19,870</strong></td>
<td><strong>3,592</strong></td>
<td><strong>10,099</strong></td>
<td><strong>5,273</strong></td>
</tr>
</tbody>
</table>

Source: Home Mortgage Disclosure Act (HMDA), 2008

Among the top twelve lenders, HSBC Mortgage had the highest approval rate, followed by Webster Bank, but each of these institutions approved less than 50% of the applications, a reflection of the tight credit in the housing market at that time. The lowest percentage of loan approvals was by William Raveis Mortgage, which approved only one loan. JPMorgan Chase Bank had the highest denial rate at 61.0% and Webster Bank had a denial rate of 60.0%.

As discussed earlier, an important variable in dissecting lending outcomes is the percentage of withdrawn or closed loan applications. Though HSBC had the highest rate of loan approvals, it also had the highest rate of withdrawals, followed by CitiMortgage, both of which had rates over 40%.

**CRA Rating**

The Community Reinvestment Act (CRA) is intended to encourage regulated financial institutions to help meet the credit needs of entire communities, including low and moderate-income neighborhoods. CRA ratings are provided for the main or regional headquarters of the financial institution. Depending on the type of institution and total assets, a lender may be examined by different agencies for its CRA performance. Databases maintained by the Federal Reserve Board (FRB), Federal Financial Institutions Examination Council (FFIEC), Federal Deposit Insurance Corporation (FDIC), and Office of the Comptroller of the Currency (OCC) were researched for the performance of the top financial institutions issuing home loans.
Among the lenders active in the City, eleven received ratings from the FFIEC. The table below shows the rating received by these financial institutions. All lending institutions examined received either Outstanding or Satisfactory ratings.

**FFIEC Interagency Community Reinvestment Act (CRA) Ratings**  
**Bridgeport-Stamford-Norwalk, CT MSA: 2008**

<table>
<thead>
<tr>
<th>Institution Name</th>
<th>State</th>
<th>Supervising Agency</th>
<th>Year Rated</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bank of America, N.A.</td>
<td>NC</td>
<td>OCC</td>
<td>2006</td>
<td>Outstanding</td>
</tr>
<tr>
<td>JPMorgan Chase Bank, N.A.</td>
<td>OH</td>
<td>OCC</td>
<td>2007</td>
<td>Outstanding</td>
</tr>
<tr>
<td>People’s Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2006</td>
<td>Outstanding</td>
</tr>
<tr>
<td>Newtown Savings Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2008</td>
<td>Satisfactory</td>
</tr>
<tr>
<td>Newalliance Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2009</td>
<td>Outstanding</td>
</tr>
<tr>
<td>HSBC Bank</td>
<td>NY</td>
<td>FRB</td>
<td>2003</td>
<td>Outstanding</td>
</tr>
<tr>
<td>Webster Bank, N.A.</td>
<td>CT</td>
<td>OCC</td>
<td>2006</td>
<td>Satisfactory</td>
</tr>
<tr>
<td>Liberty Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2008</td>
<td>Outstanding</td>
</tr>
<tr>
<td>First County Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2009</td>
<td>Outstanding</td>
</tr>
<tr>
<td>Fairfield County Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2004</td>
<td>Satisfactory</td>
</tr>
<tr>
<td>Union Savings Bank</td>
<td>CT</td>
<td>FDIC</td>
<td>2004</td>
<td>Outstanding</td>
</tr>
</tbody>
</table>

Source: Federal Financial Institutions Examination Council's (FFIEC), 2010

**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. 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 Human Relations Commission keeps records of the various contacts and complaints it receives. In the fiscal year 2008-2009, 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. The figures relating to both security deposits and evictions are part of the discussion on housing policies and practices as impediments that will be discussed later.

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:

<table>
<thead>
<tr>
<th>Category</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>15</td>
</tr>
<tr>
<td>Creed/Religion</td>
<td>8</td>
</tr>
<tr>
<td>Color</td>
<td>15</td>
</tr>
<tr>
<td>National Origin</td>
<td>12</td>
</tr>
<tr>
<td>Ancestry</td>
<td>3</td>
</tr>
<tr>
<td>Sex/gender</td>
<td>8</td>
</tr>
<tr>
<td>Marital Status</td>
<td>8</td>
</tr>
<tr>
<td>Age</td>
<td>5</td>
</tr>
<tr>
<td>Source of Income</td>
<td>12</td>
</tr>
<tr>
<td>Familial Status</td>
<td>10</td>
</tr>
<tr>
<td>Disability</td>
<td>13</td>
</tr>
<tr>
<td>Sexual Orientation</td>
<td>3</td>
</tr>
</tbody>
</table>

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, perhaps through a regional organization, would further facilitate the identification of patterns and trends and the City should consider funding for either additional staff or hiring of an outside entity to engage in such testing.

These topics lead to a discussion of public policies and practices that create impediments to fair housing choice.

**PUBLIC POLICIES AND PRACTICES**

Public policies established at the local level can affect housing development and therefore, may have an impact on the range and location of housing choices available to residents. Fair housing laws are designed to encourage an inclusive living environment and active community participation. An assessment of public policies and practices enacted by the City can help determine potential impediments to fair housing opportunity. A review of the Fair Housing Officer’s Annual Report, discussions with the Fair Housing Officer, other local officials, parties involved in fair housing issues, and with the Housing Authority, led to the following comment. The City should continue efforts to monitor and improve, when necessary, policies regarding reasonable accommodation requests and issues concerning familial discrimination. Further the City should continue towards ensuring all City master planning works to provide appropriate housing density, mixed use integration and availability to protected classes.

The location of affordable housing, group homes and public housing may stir resistance from residents of the affected neighborhoods. The City should take proactive measures to ensure that the locations of such units are actively integrated into the community.
OBSERVATIONS

The key points that emerge from the preceding discussion are:

1. The loan denial rate is higher for Hispanics and African-Americans than other groups.

2. The number of complaints being brought to the Fair Housing Officer is increasing and the number of cases relating to race/color, disabilities and lawful source of income is increasing.

6) CONCLUSIONS AND RECOMMENDATIONS

This section summarizes the key findings of the AI document, makes recommendations about actions to eliminate impediments to fair housing choice in Norwalk. This information is by no means comprehensive, and there undoubtedly remain a number of additional remedies to these and other problems faced by home seekers.

Housing discrimination continues to occur, and manifests itself in different ways among different segments of the population. Since it continues to be the goal of the City to eliminate any existing discrimination and prevent future housing discrimination and other impediments to equal housing opportunity, the recommendations provided below provide a guide to ensure fair access to housing for all City residents.

This 2010 AI builds upon the 2002 AI, analyzing data and identifying the private and public sector conditions that foster housing discrimination, and providing recommendations for dealing with the fair housing issues identified. Based upon research and interviews with persons involved in housing and land use issues in the City, the following is a list of key impediments that exist in Norwalk. Each impediment is followed by recommendations to address and eliminate that impediment.

Several of these topics are closely related and linkages among them are noted.

To ensure the City is responsive to the recommendations described in this section, the Common Council will establish a working group that will work toward implementing these recommendations. The working group will provide quarterly updates to the Planning Committee of the Common Council regarding their progress and will bring forward for the Planning Committee’s consideration any documents produced by the working group or any relevant documents produced by these Commissions or Agencies. Upon review of such documents the Planning Committee will offer its comments and determine if any formalized comment or recognition of said document and/or any legislative action is required by the Common Council. The working group will be led by the Redevelopment Agency serving as staff to the Planning Committee and include the Chairs and associated staff of the Fair Housing Advisory Commission, Fair Rent Commission and Human Relations Commission.

IMPEDIMENT ONE – DISCRIMINATION IN THE HOUSING MARKET

The review of demographic information, discrimination complaint data, and data obtained from interviews indicate 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.

In particular, discrimination among the protected classes should be the focus of the City’s analysis concentrating on the top three indices of discrimination listed below.

Race/color
Disability
Lawful source of income

Recommendations

1) Educate 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. The City is active in this regard, and these efforts should be continued and even expanded, including funding therefore, especially in the current, difficult economy.

2) Provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.

3) Continue to conduct training sessions and information campaigns especially among rental property owners and managers, as well as apartment owner associations, and management companies.

4) Monitor Fair Housing complaints and issues across the various venues and organizations through which these complaints may be made in order to obtain a better picture of issues and problems.

5) Increase housing choice alternatives for the disabled and families with children.

6) Convene 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. These groups should identify discriminatory practices, trends, or changes in these practices, focal points of discriminatory practice, and the means or methods to address them.

7) Related to the previous recommendation, ethnic, religious, and service groups should be educated about Fair Housing issues and encouraged to serve as conduits for information, questions, and complaint procedures for their membership. This will not only broaden the knowledge of Fair Housing practice in the City, but also provide more knowledge of the number and types of issues being confronted.

8) Update Fair Housing information regularly and adjust strategies and actions accordingly. In particular, the groups mentioned above should meet yearly or every eighteen months to review and update plans and programs.
9) The City should seek the resources to expand the data collection and analysis capabilities of the local fair housing entities with the Fair Housing Officer directing this effort.

IMPEDEMENT TWO – HOUSING AFFORDABILITY
As discussed earlier, affordability is one aspect of housing discrimination and it is difficult to talk about addressing impediments to fair housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to maintain an adequate supply of affordable housing.

Earlier sections of this Analysis and the Housing Market Analysis in the Consolidated Plan address the issue of affordability in detail, and the arguments and statistics will not be repeated here. Suffice to say that even moderate-income households face challenges in purchasing a home in Norwalk, and low-income families face a significant cost burden for rental housing.

Recommendations
1) Continue to use federal and state funding resources and programs to address high priority housing needs for rehabilitation, preservation, and home ownership creation.
2) Continue to work with community based organizations, affordable housing developers, and housing advocacy groups to leverage resources for affordable housing preservation.
3) Work with the Zoning Commission to publicly review the effectiveness of the existing Inclusionary Zoning Regulation.
4) Continue and, if possible, expand the City’s housing rehabilitation programs to preserve and strengthen the City’s base of affordable units, both owner-occupied and rental.

IMPEDEMENT 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.

Recommendations
1) Ensure that all City master planning works to provide appropriate housing density, mixed income integration, and is available to protected classes;
2) Ensure that reasonable accommodation and disabled access issues are properly addressed.
3) Encourage the use of “visitability” and universal design principles, which exceed Federal and State accessibility requirements, in new housing construction. Encourage developers, housing advocacy groups, and other interested parties to conduct neighborhood outreach and information campaigns before submitting projects for review and approval.
4) Encourage developers, housing advocacy groups, and other interested parties to conduct neighborhood outreach and information campaigns before submitting projects for review and approval.
5) Undertake a public outreach/education program

**IMPEDEMENT FOUR – LENDING PRACTICES**
This Analysis found that some minority groups did have higher rates of loan denial and loan withdrawal than other groups. The issue does not appear to have generated specific complaints. However, the City should, to the extent possible, ensure that persons seeking loans for home purchase or improvement are aware of lending practices and procedures.

**Recommendations**
1) Develop programs to foster conventional lending and banking services in underserved neighborhoods and to specific groups of persons.
2) Work with nonprofits to expand financial literacy and credit counseling programs, especially in minority and lower-income neighborhoods.
3) The significant discrepancy between lending to Hispanic homebuyers and other homebuyers is not explained by the data. This discrepancy should be examined further to understand the difference.
4) Assist residents who suspect lending discrimination in bringing complaints to the Connecticut Department of Banking and Attorney General’s office for review and enforcement.