



Analysis of Impediments to Fair Housing Choice

Town of Hamden
August 2020

Prepared for:
Town of Hamden

MMI #1228-87

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1.0 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the Town of Hamden's efforts to satisfy the requirements of the Housing and Community Development Act of 1974, as amended, which requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing.

1.1 What is an AI?

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

- (a) A comprehensive review of the Town's laws, regulations, and administrative policies, procedures, and practices;
- (b) An assessment of how those laws, etc., affect the location, availability, and accessibility of housing; and
- (c) An assessment of conditions, both public and private, affective fair housing choice.

1.2 What are Impediments to Fair Housing Choice?

- (a) Any actions, omissions, or decisions taken because of one of the following protected classes; race, color, religion, sex, disability, familial status, or national origin which restrict housing choices of the availability of housing choices, or
- (b) Any actions omissions or decisions which have the effect of restricting housing choices of availability of choices on the basis of race, color, religion, sex, disability, familial status, or national origin

Hamden's most recent update to the Analysis of Impediments (AI) to Fair Housing Choice was completed in 2015. The 2015 AI identified housing impediments are summarized below:

- Limited English proficiency
- Discriminatory lending practices
- Lack of zoning to promote affordable housing
- Lack of public transportation options limits housing options
- Insufficient family-style stock
- The condition of public housing
- Lack of regional coordination

2.0 BACKGROUND DATA

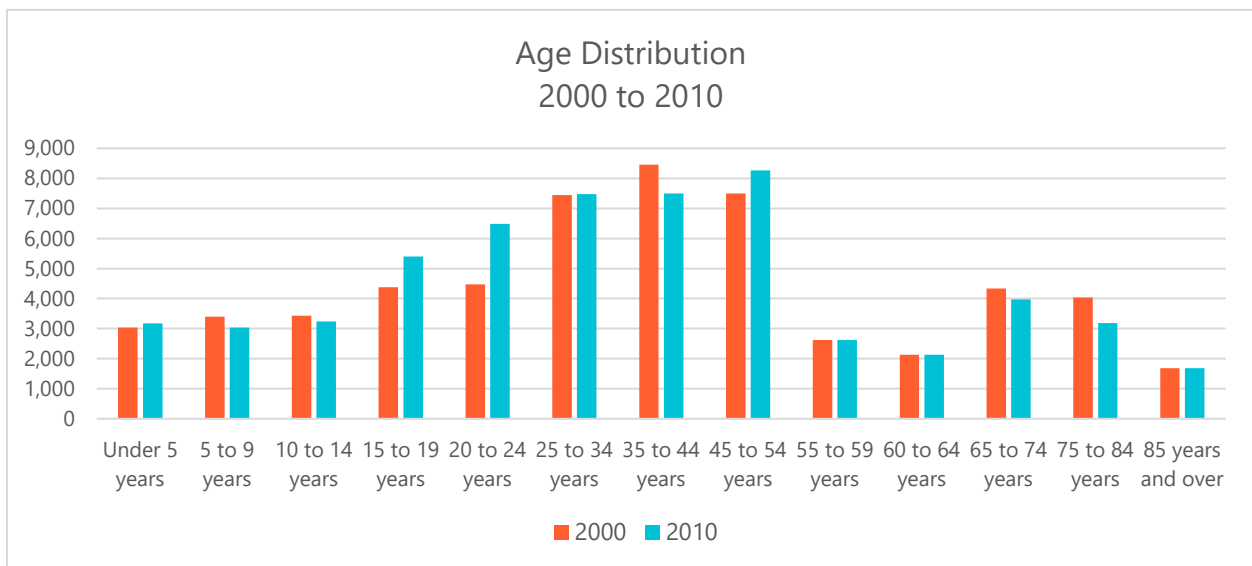
2.1 Demographic Trends and Characteristics

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

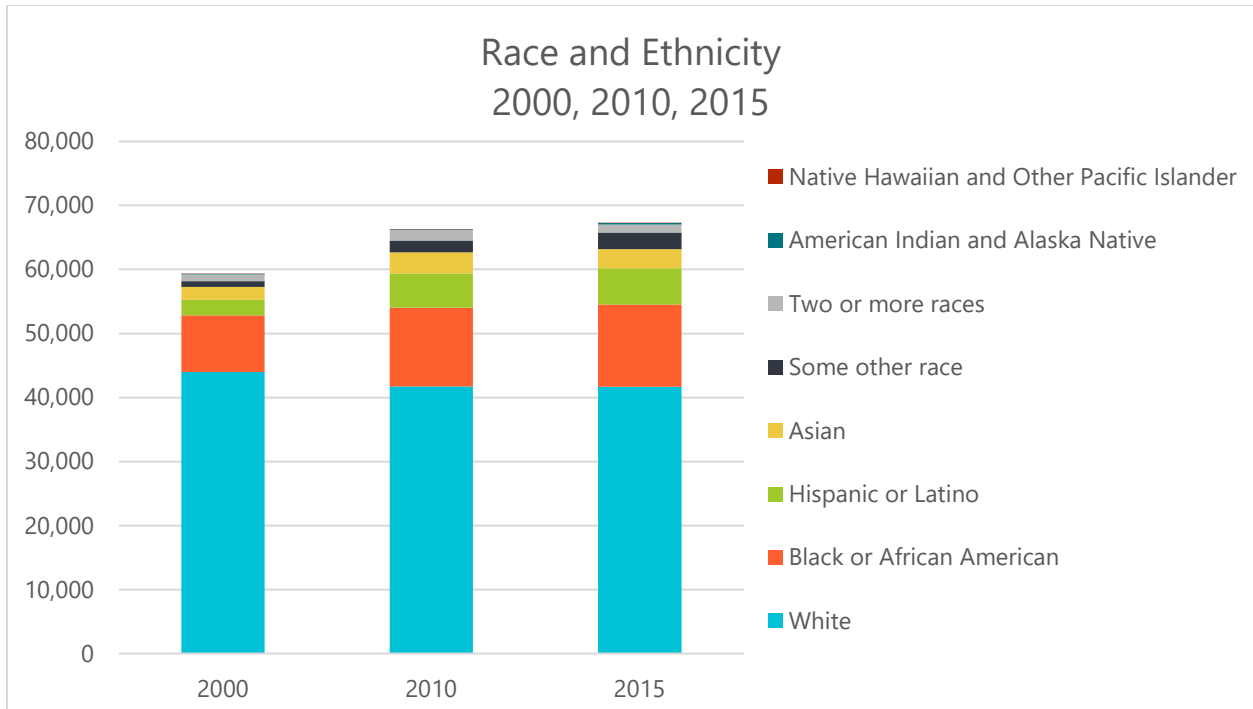
The bullet points below summarize the most salient changes and trends in this data for the Town of Hamden. These trends and changes play an important role in understanding and planning for the future housing and community development needs of Hamden's citizens.

General Demographics

- Between 2000 and 2010, Hamden's population increased by 6.6% from 56,913 to 60,960 residents.
- Significant changes in age distribution profile of the town, including a 7% increase in the number of children under 19, a 17% increase in the young adult population (age 20 to 34), a 1% decrease in middle-aged adults (age 35 to 54), no change in older working-aged adults (age 55 to 64), and a 12% decrease in the senior population (age 65 years old and over).



- Median age decreased from 37.7 years old in 2000 to 37.4 years old in 2010. The 2015 ACS estimates that the median age has risen to 37.9 years old.
- Between 2000 and 2010, Hamden experienced a decrease in its white population (-5%) and growth in its Hispanic/Latino (78%) and African American (30%) populations.

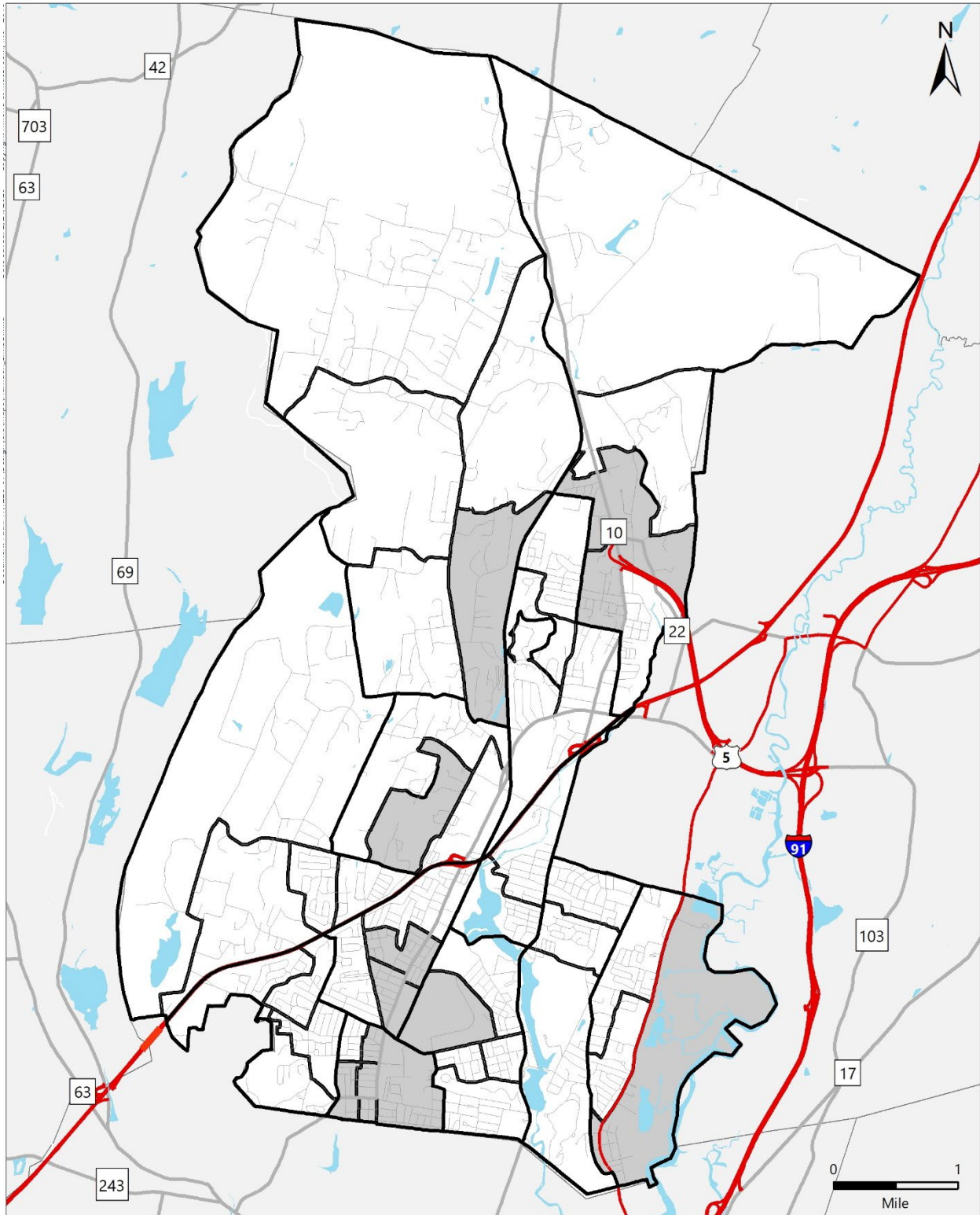


Social Characteristics

- Decrease in the number of single-parent households headed by a female and in the number of married couple families (2010, 2015).
- The number of non-family households decreased by 3% between 2010 and 2015. The number of single-person households decreased by 2% over the same time period.
- The number of children living with grandparents decreased by 41% between 2010 and 2015.
- Average household size grew between 2000 and 2010 from 2.35 to 2.37 persons per household. The 2015 ACS estimates that household size has continued to rise to 2.42 persons per household.
- As of 2015, 19.2% of Hamden residents spoke a language other than English at home. About 25.1% of these residents reported speaking English less than “very well.”
- The number of Spanish-speaking residents decreased by 34% between 2010 and 2015.
- As of 2015, 13.4% of Hamden residents were foreign born which is up from 10.7% in 2010. The largest number of foreign-born residents are born in India, Jamaica, China, and Italy. In addition, about 4.6% of Hamden’s population as born in Puerto Rico as of 2015, up from 4.0% in 2010.
- The number of adults age 25 years old and over that have a bachelor’s degree or higher increased from 40.4% in 2010 to 46.2% in 2015.
- The number of adults age 25 years old and over with less than a high school degree decreased from 7.6% in 2010 to 6.5% in 2015.

Economic Characteristics

- According to the CTDOL, Hamden's unemployment rate has decreased from 8.7% in 2010 to 3.6% in 2018. However, Town's civilian labor force decreased by 8.8% during that same time period meaning that there are fewer people employed or looking for work than there were in 2010.
- According to the 2015 ACS estimates, non-Hispanic whites experience lower unemployment rates compared to African Americans and Hispanics. Persons with disabilities and persons with less than a high school degree are disproportionately more likely to be unemployed compared to the general population.
- The distribution of employment across sectors has remained relative consistent. In 2013 and 2018, the largest industry by employment was Educational Services. This sector is also the fastest growing in terms of number of jobs. It employs over 9,300 people in town and grew by 37%, adding 2,534 jobs, from 2013 to 2018. The second largest industry sector by employment in Hamden is Health Care and Social Assistance, which employs just nearly 4,200 and grew 3% from 2013 to 2018.
- Between 2010 and 2015, the number of residents who take public transportation to work has increased from 2.6% to 4.4%. However, driving alone remains the predominant means of transportation to work, 81.3% in 2010, and 78.4% in 2015.
- Median household income increased from \$66,695 in 2010 to \$70,791 in 2015. Household incomes did not grow at the same pace as inflation. As a result, relative household income actually decreased.
- The number of people who are living in poverty has remained around 8%.
- In 2015, 34.2% of households have incomes of less than \$50,000 per year. 17.1% of households have incomes of less than \$25,000 per year.



Target Areas



Town of Hamden
 Hamden Government Center
 2750 Dixwell Avenue
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- Census Tracts
- Low and Moderate Income Target Areas

Low to moderate income individual data by block group based on the 2011-2015 American Community Survey (ACS) associated with the FY 2019 Entitlement CDBG Grantees.



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Housing Tenure

Between 2000 and 2010, the number of occupied housing units in Hamden has increased by 1,302 units. Housing tenure remained relatively unchanged over the time period, with 68% of units being owner-occupied and 32% of units being renter occupied. The estimate of housing units in 2015 is relatively equal to the count in 2000, and the proportion from owner to renters is the same.

Hamden's housing stock is predominantly detached, owner occupied homes. The Town also has certain neighborhoods that have very high concentrations of rental units. Hamden's multi-family stock is primarily made up of two- and three- bedroom units.

Occupied Housing Units by Tenure: 2000, 2010, 2015

Housing Tenure	2000		2010		2015	
	Number	% of Total	Number	% of Total	Number	% of Total
Owner Occupied	15,069	67.25%	16,371	67.93%	15,336	66.14%
Renter Occupied	7,339	32.75%	7,728	32.07%	7,851	33.86%
Total	22,408	-	24,099	-	23,187	-

Source: QT-H2 - Tenure, Household Size, and Age of Householder: 2000, 2010, 2015

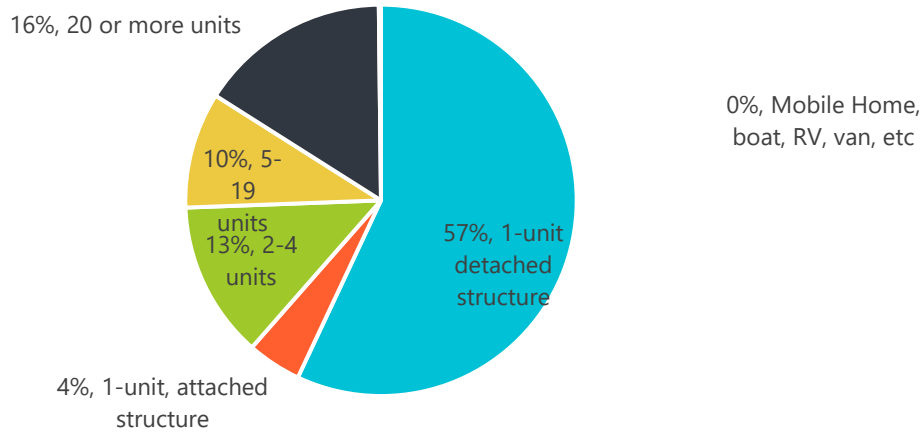
Units in Structure

Roughly 57% of the Town's housing stock is in the form of single-family detached homes. Another significant component of the Town's housing stock is in the form of two- to four-family residential structures, with 13% of the housing units situated in these types of structures. About 10% of units are in structures with between five- and nineteen-units and another 15.8% are in structures with 20 or more units. The table below provides the breakdown of units in structure for 2015.

Property Type	Number	%
1-unit detached structure	14,377	57.0%
1-unit, attached structure	1,132	4.5%
2-4 units	3,266	12.9%
5-19 units	2,414	9.6%
20 or more units	3,992	15.8%
Mobile Home, boat, RV, van, etc.	46	0.2%
Total	25,227	

Source: 2011-2015 ACS

Property Types by Number of Units

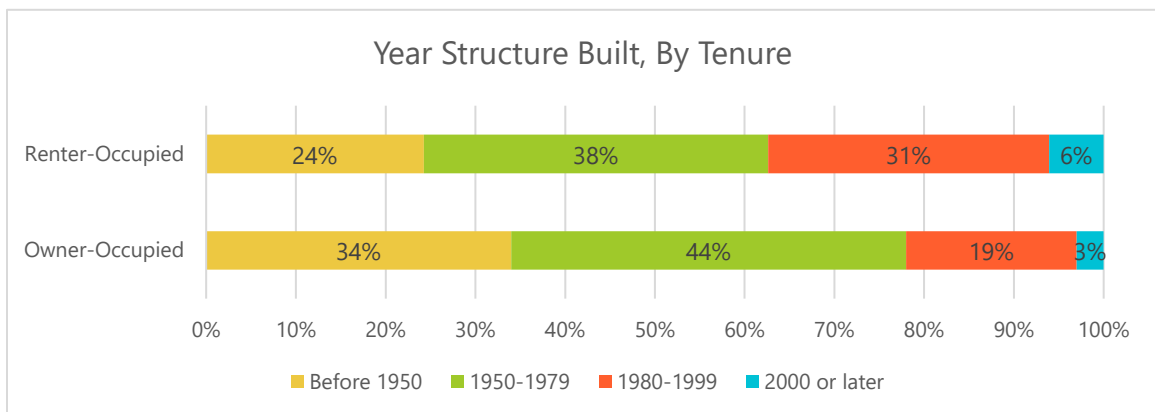


Year Structure Built

Hamden is home to an aging housing stock. Age distribution has stayed relatively stable in recent years. Only about 4% of housing units were built since 2000. About 31% of housing units were built before 1950. A greater share of owner-occupied units (34%) were built before 1950 compared to renter-occupied units (24%). A breakdown of housing age, by tenure, is shown in the following table.

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	445	3%	485	6%
1980-1999	2,900	19%	2,455	31%
1950-1979	6,770	44%	2,995	38%
Before 1950	5,220	34%	1,920	24%
Total	15,335		7,855	

Source: 2011-2015 CHAS



Housing Condition

The incidence of physical inadequacy (which does not necessarily overlap with the HUD definition of “housing problems” as defined in the 2011-2015 CHAS data) in the Town’s renter- and owner-occupied units is difficult to determine. Various statistical indicators can be used but each provides a different estimate. It is statistically problematic to add the indicators together, as many substandard properties will overlap into several indicators.

The incidence of physical inadequacy can also differ, depending on the housing quality standard used as a base and what a household perceives and reports as a physical inadequacy. For example, the existence of a code violation (building, fire, etc.) can classify a building as substandard. On the other hand, HUD minimum property standards may have requirements which are more restrictive than local codes. For this report, the 2015 CHAS dataset (based on the ACS) on the lack of adequate plumbing and kitchen facilities was reviewed as indicators of severely inadequate housing. As of 2015, about 0.7% of Hamden households lacked complete plumbing or kitchen facilities. These indicators appear most frequently in low- and moderate-income households, but it is impossible to determine the exact percentages or to estimate the tenancy of these units due to the small sample size and large margin of error. As a result, this information cannot be used to assess the amount of the Town’s housing stock that is suitable for rehabilitation.

There are approximately 1,000 vacant units suitable for rehabilitation. These units could be renovated and occupied to relieve some of the needs for housing.

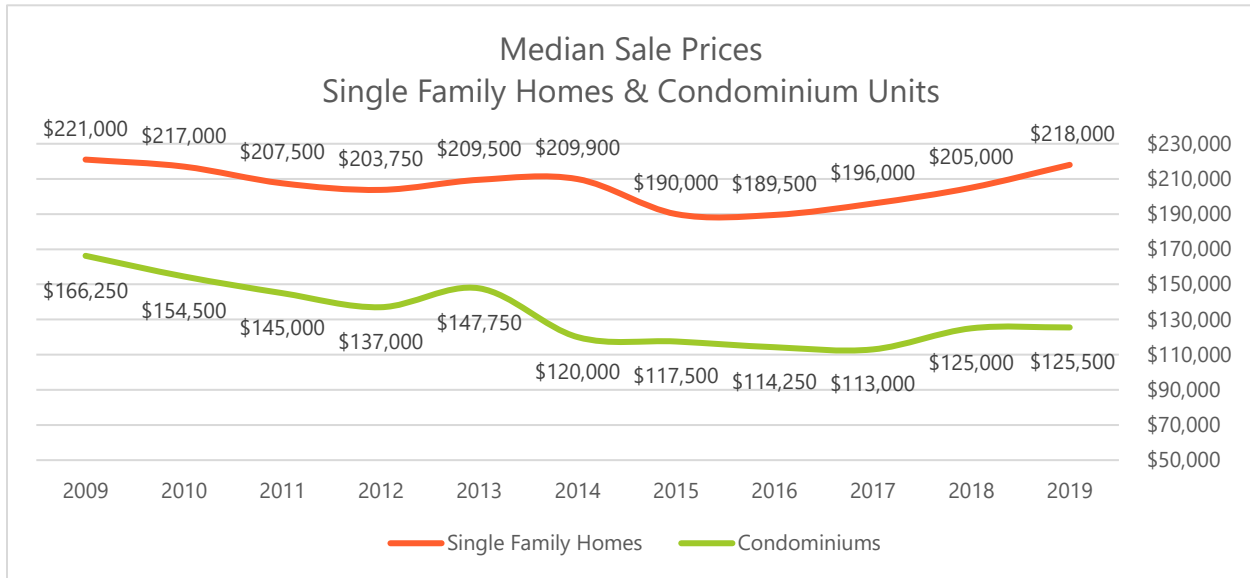
Housing Sales

The median sale price for single-family homes has fallen between 2009 and 2019 from \$221,000 to \$218,000 per year. In addition, median sale prices are still well below their pre-recession peak of \$267,000 in 2006. Median condominium sale prices dropped by 24.5% between 2009 and 2018. The lack of recovery in home sale prices may discourage homeowners from investing in their properties, which may lead to further disinvestment and result in lower property values. While Hamden’s housing stock remains more affordable than other Connecticut municipalities, many low-income families lack the financial resources for a down payment or lack the credit history to secure a mortgage.

Median Sale Prices, 2009 - 2019		
Single Family Homes & Condominium Units		
Town of Hamden		
Year	Single Family Homes	Condominiums
2019	\$218,000	\$125,500
2018	\$205,000	\$125,000
2017	\$196,000	\$113,000
2016	\$189,500	\$114,250
2015	\$190,000	\$117,500
2014	\$209,900	\$120,000
2013	\$209,500	\$147,750
2012	\$203,750	\$137,000
2011	\$207,500	\$145,000
2010	\$217,000	\$154,500

2009	\$221,000	\$166,250
% Change, 2009-2019	-1.4%	-24.5%

Source: The Warren Group

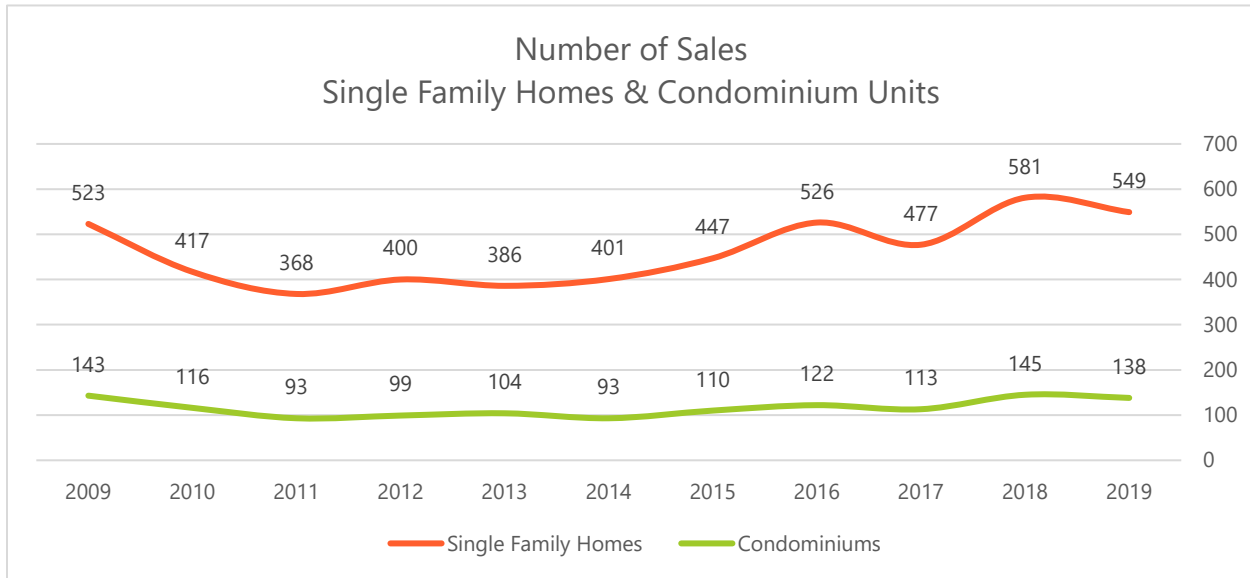


The number of single-family sales has recovered from the early 2010s to 2019 as the Town continues to recover from the Great Recession. Single-family sales decreased from 523 in 2009 to a low of 368 in 2011. Since 2011, single-family sales have increased significantly, reaching 581 in 2018. Overall, single-family sales are up 5% between 2009 and 2019. Condominium sales lagged between 2009 and 2019, although they are up significantly from their Recession low of 93 sales in 2011 and 2014.

Number of Sales, 2009 - 2019		
Single Family Homes & Condominium Units		
Town of Hamden		
Year	Single Family Homes	Condominiums
2019	549	138
2018	581	145
2017	477	113
2016	526	122
2015	447	110
2014	401	93
2013	386	104
2012	400	99
2011	368	93
2010	417	116
2009	523	143

TOTAL	5,075	1,276
Annual Average	461	116
% Change, 2009-2019	5.0%	-3.5%

Source: The Warren Group



Fair Market Rents

The following table illustrates the HUD-defined Fair Market Rents (FMRs) for New Haven-Meriden HUD Metropolitan FMR Area, of which Hamden is a part. Over the last five years, the FMRs for smaller housing units (efficiencies and 1-bedroom units) have increased at the fastest rates of 20.9% and 12.5%, respectively. FMRs for 2- and 3-bedroom units have increased at a lower rate of 11.7% and 9.6%, respectively, over the last five years.

Rent levels have been rising over the last five years. In the past, FMRs established by HUD for the Housing Voucher Program have often represented the high end of the rental market. However, recently rents over \$1,000 in the private market have been asked and achieved. Median gross rent in 2016 was \$1,273. This increases the affordability problem for low and very low-income households. With the declining number of Housing Vouchers available and incomes not increasing at the same rate as inflation, additional pressure is being placed on low- and moderate-income households to find affordable rents.

Fair Market Rents in New Haven-Meriden HUD Metro FMR Area: 2016 to 2020					
# of Bedrooms	2016	2017	2018	2019	2020
Efficiency	\$862	\$968	\$965	\$1,049	\$1,042
1 Bedroom	\$1,033	\$1,093	\$1,074	\$1,163	\$1,162
2 Bedroom	\$1,260	\$1,325	\$1,299	\$1,403	\$1,407
3 Bedroom	\$1,619	\$1,708	\$1,662	\$1,788	\$1,775
4 Bedroom	\$1,866	\$2,013	\$1,979	\$2,070	\$2,008

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

Housing Permits

According to data on housing production collected by the State of Connecticut's Department of Economic and Community Development (DECD), just 203 new units were produced in Hamden between 2009 and 2018. These permits do not consider the 49 demolition permits that were issued during that same time period. The town saw a net decrease of 154 housing units between 2009 and 2018.

Housing Permits by Number of Units in Structure, 2009 - 2018											
Town of Hamden											
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Total	16	19	9	15	9	10	12	9	9	7	115
Single-Family	6	9	3	4	4	4	4	5	5	5	49
Multi-Family	0	8	0	0	0	33	29	26	25	33	154

Source: State of Connecticut Dept. of Economic and Community Development

Affordable Housing Units

According to DECD's 2018 Affordable Housing Appeals List, Hamden has 2,126 assisted housing units comprising about 8.5% of the Town's total housing stock. There were 937 units receiving government assistance, 699 units receiving rental assistance, 486 single family CHFA/ USDA Mortgages, and 4 units were deed restricted.

2.2 Home Mortgage Disclosure Act (HMDA) Statistics

Since the cost of housing is the primary barrier to housing choice in Connecticut and Hamden, the availability of mortgage financing for housing is crucial to the reduction of barriers. In order to examine the availability of mortgages, data collected under the Home Mortgage Disclosure Act (HMDA) were researched. The following discussion summarizes the results of this research.

The HMDA data were analyzed for 2017 (the most recent year available) were analyzed for Hamden and the New Haven-Milford Metropolitan Statistical Area (MSA). The ratio between mortgage applications approvals and denials was computed for both geographies. For the MSA, the rate was 0.12 for conventional mortgages and 0.19 for FHA/VA/RHS mortgages. The denial-to-approval ratio for the Town of Hamden is higher than the MSA across all loan types. The ratio for conventional purchases was 0.18 and 0.23 for FHA/VA/RHS mortgages. 13 out of 20 census tracts in Hamden have denial rates for conventional mortgages that are greater than the Town-wide average. These tracts are located primarily in the center and southern sections of Hamden.

Ratio of Denials to Approvals, 2017				
Town of Hamden and New Haven-Milford MSA				
Geography	FHA, FSA/RHS & VA Purchase	Conventional Purchase	Refinancings	Home Improvement Loans
Hamden	0.23	0.18	0.74	1.13

New Haven-Milford MSA	0.19	0.12	0.54	0.92
# of Hamden Census Tracts with higher ratio than town-wide	12	10	13	10
# of Hamden Census Tracts with lower ratio than town-wide	8	10	7	10

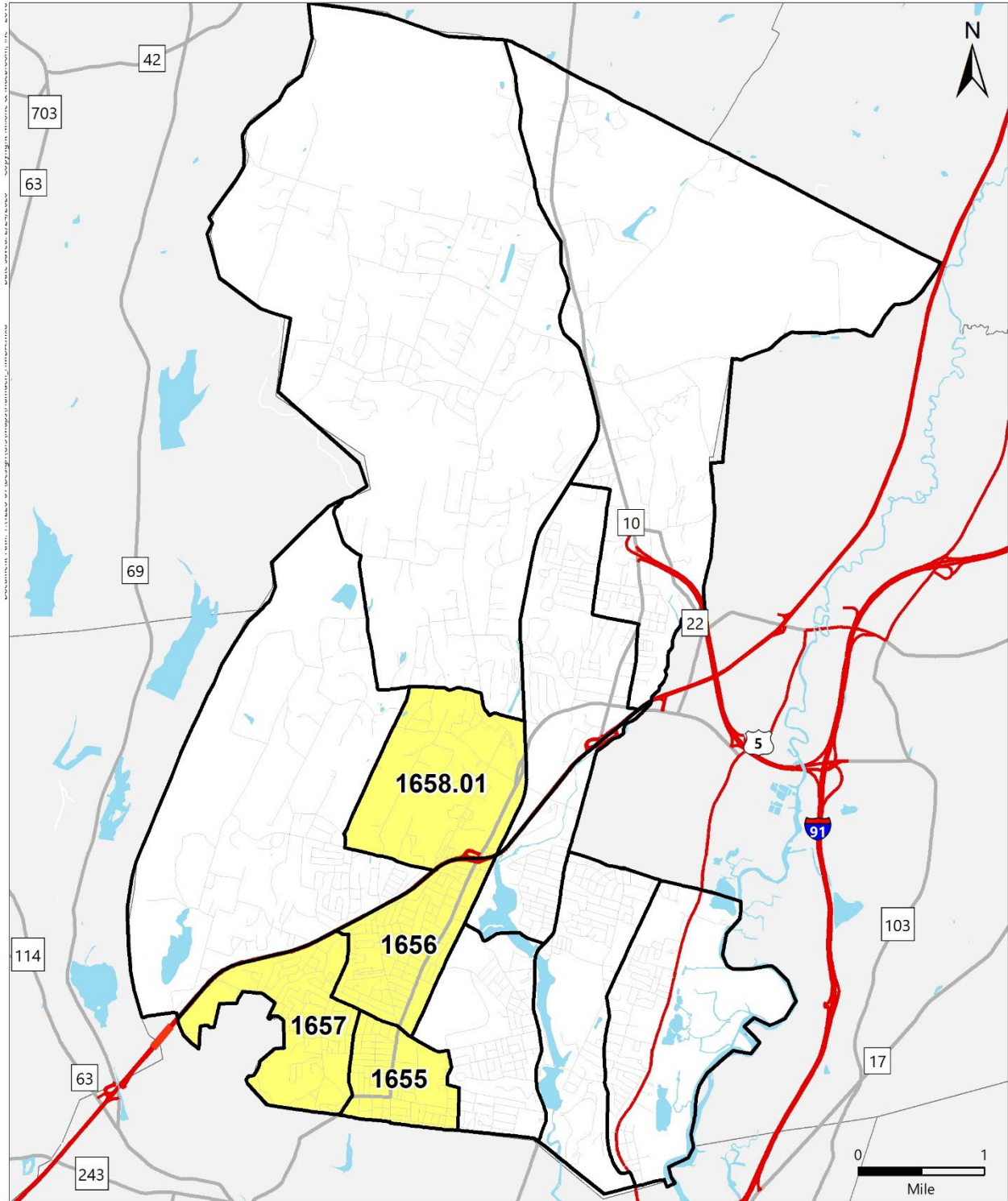
Source: Home Mortgage Disclosure Act Database, US Consumer Finance Protection Bureau

In addition to the census tract level analysis, the denial-to-approval ratios were analyzed by race and ethnicity for applicants in the New Haven-Milford MSA. The results of this analysis are summarized in the following table. Generally, denial-to-approval ratios for white, non-Hispanic borrowers were lower than that of the population as a whole, and significantly lower than other racial and ethnic groups in most instances. For conventional home purchases, Hispanics, African Americans, and Native Hawaiians/ Pacific Islanders have nearly two - three times the denial-to-approval ratio as non-Hispanic Whites.

Ratio of Denials to Approvals, by Race and Ethnicity¹: 2017				
New Haven-Milford MSA				
Race or Ethnicity	FHA, FSA/RHS & VA Purchase	Conventional Purchase	Refinancings	Home Improvement Loans
White, Non-Hispanic	0.15	0.10	0.45	0.71
African American	0.25	0.24	1.13	2.86
Hispanic	0.20	0.16	0.78	2.50
Asian	0.22	0.12	0.45	0.79
Native American	0.33	0.00	1.42	5.50
Native Hawaiian/ Pacific Islander	0.43	0.29	0.71	-

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

1. Based on primary applicant race & ethnicity



Census Tracts with Higher than Average Mortgage Denial Rates: 2017



Town of Hamden
 Hamden Government Center
 2750 Dixwell Avenue
 Hamden, CT, 06518
 (203) 287-7000

Legend

Higher than Average Denial Rates

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

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

3.0 EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

3.1 Housing Complaints

The range of complaints and inquiries received by the Fair Housing Assistance Program in the last 5 years is reflected in the table below. Complaints with multiple bases are listed under each basis, so they appear to be counted twice. There were 6 total complaints from 2015 to 2019.

Fair Housing Assistance Program	2015	2016	2017	2018	2019	Total
Disability	2	1				3
Race		1	1			2
Color			1			1
Sex			1		1	2
Total	2	2	1		1	6

3.2 Public Sector Issues

Hamden does not present impediments to fair housing choice. The housing stock in the town provides a range of housing types and densities. However, as discussed earlier, affordability continues to be an issue faced by low- and very low-income residents. The cost burden is such that many households find themselves paying over 50% of their income for housing.

Hamden is subject only to the provisions of the Connecticut Affordable Housing Act, which is intended to promote affordable housing throughout the State. The Affordable Housing Act makes it more difficult for a land use commission to deny any application in which at least 25% of the new housing units are affordable and provides a special appeals process. The Affordable Housing Act also requires that towns dedicate at least 10% of their housing stock to affordable housing. Currently the town of Hamden only has 8.5% of its housing stock dedicated to affordable housing.

In recent years, Hamden has made strides in promoting affordable housing through its zoning regulations. Examples of some of these regulations include:

- Requirement that multi-family housing developments containing 5 or more dwelling units shall set aside a minimum of 20% of the dwelling units as Affordable Housing
- Determining the maximum price for all affordable housing units
- Determining the maximum price for all affordable rental units
- Building requirements for all affordable housing units

However, there is still room to update and improve the regulations. For instance, the code contains a rather restrictive definition of "family" which may limit housing choice and rental options. Although the R-3 and R-4 zones in town generally have public water and sewer access, they are restricted to single family homes. Exploring ways of opening some or all parts of these zones to higher density development while maintaining a desirable character, may improve housing choice and affordability in the long term.

3.3 Legal Status

There are no fair housing discrimination suits filed by the Department of Justice or private plaintiffs nor has the Secretary of HUD issued a charge of made a finding of discrimination.

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

4.1 Language and Cultural Barriers

From 2000 to 2015, the proportion of the population that is a racial or ethnic minority in Hamden has increased from 25% of the total to 37% of the total population, an increase of 12 percentage points. The number of people over the age of 5 who speak English less than "very well" (as self-reported on Census forms) has increased from 4.1% to 4.8%. As Hamden becomes more diverse, actions need to be taken to reduce fair housing barriers for racial, ethnic, and linguistic minorities.

Action: The Town has proactively established both a Human Rights and Human Relations Commission and a Commission on Disability Rights and Opportunities to ensure that Hamden's diversity is both celebrated and promoted. These citizen organizations, as well as Hamden's Department of Elderly Services, Department of Community Services, and New Haven Legal Assistance will continue to collaborate to ensure that Hamden residents (and potential residents) understand the law as it pertains to fair housing and have opportunities through a number of channels to protect their rights. These groups operate as an ad hoc Fair Housing working group for the Town, preparing and providing information and group sessions across the Town. As demographics have shifted in Hamden, OCD will enlist the support of translators to offer more information to non-English speaking residents. The Manager of the OCD also serves as the Fair Housing Officer.

4.2 Discriminatory Lending Practices

Generally, denial-to-approval ratios for white, non-Hispanic borrowers were lower than that of the population as a whole, and significantly lower than other racial and ethnic groups in most instances. For conventional home purchases, Hispanics, African Americans, and Native Hawaiians/Pacific Islanders have nearly two - three times the denial-to-approval ratio as non-Hispanic whites.

Action: Since the vast majority of Hamden's minority population is either African American or Hispanic, the higher denial ratios for all types of mortgages for minority households have a severe negative impact on community efforts to revitalize neighborhoods which contain minority population concentrations. OCD will continue to monitor lending practices to ensure that individuals and communities are not discriminated against by the financial institutions chartered to assist them. Other programs, such as the down payment assistance program for first-time homebuyers, also help applicants successfully apply for mortgages and achieve homeownership.

4.3 Restrictive Zoning

As discussed in section 3.2, limiting definitions of family, and restrictive single-family zoning may discourage the development of alternative housing options.

Action: To address this issue and increase the town's housing stock, the Town will work with the Housing Authority, non-profit housing developers, for-profit developers, and local community development corporations. Several programs will be continued in order to achieve this goal, and at the same time, the Town will more actively pursue partnership and leveraging opportunities. They include, but are not limited to, the rehabilitation of existing housing stock so it can remain on the affordable housing inventory; rehabilitation of abandoned residential structures for

affordable rental and/or homeownership opportunities; promotion of activities which will create affordable homeownership opportunities; and continuation of the first-time homebuyer program.

4.4 Inefficient Public Transportation

Another potential barrier to affordable housing is the lack of convenient access to public transportation, which can directly impact the availability of homes to certain potential residents. While Hamden's diversity of residents and commercial opportunities is perhaps its greatest strength, the general limitation of public transportation to north-south corridors (specifically Dixwell Avenue, Winchester Avenue, Whitney Avenue, and State Street) serves to restrict the residential options of those without personal automobiles.

Action: The Town will continue to work closely with the Greater New Haven Transit District to offer the most comprehensive web of transit options feasible. Additionally, the Farmington Canal pedestrian path provides an alternative route for those who chose to walk or bicycle through and around Hamden.

4.5 Aging Housing Stock

Given the average age of housing stock in Hamden, architectural barriers still remain as an impediment to some potential renters and owners. About 31% of all units were constructed prior to 1950, and 42% of all units were built between 1950 and 1979, before contemporary standards of access were applied to residential spaces and prior to guidance on lead-based paint. For the elderly and disabled, multistory homes as well as areas without continuous sidewalks provide obstacles to those with physical limitations.

Action: Through both General Funds and CDBG funds, the Town of Hamden is aggressively pursuing sidewalk repairs and curb cuts to assist this population, particularly along major thoroughfares. Additionally, OCD continues its emphasis on encouraging rehabilitation that will allow disabled residents to remain in their homes. OCD has collaborated with two organizations to provide minor rehabilitation assistance to homes in need of ramps for disabled occupants.

4.6 Lack of Regional Coordination

Another impediment to affordable housing is the lack of coordination at the regional level. There is a need to create a broad-based regional initiative to address the issues of affordable housing and fair housing within south central Connecticut.

Action: The Town will continue to work closely with the South Central Regional Council of Governments and neighboring municipalities to promote new, equitable, affordable housing throughout the region.

5.0 CONCLUSION

Through these channels, as well as previously mentioned actions and efforts, the Town of Hamden is affirmatively and aggressively furthering fair housing. The Town of Hamden has, and will continue to, address any external attempt to limit housing choice for Town residents and potential Town residents alike.

SIGNATURE PAGE FOR THE TOWN OF HAMDEN

By my signature, I certify that the Analysis of Impediments to Fair Housing Choice for the Town of Hamden is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program.

Curt Leng, Mayor

Date