

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
MANCHESTER, CONNECTICUT**

PREPARED BY:

THE MANCHESTER PLANNING DEPARTMENT

PREPARED FOR:

**THE TOWN OF MANCHESTER
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
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I. INTRODUCTION

The Analysis of Impediments to Fair Housing Choice, (AI) is a review of barriers to fair housing choice in the public and private sector. The AI involves:

- A comprehensive review of the entitlement jurisdiction's laws, regulations, administrative policies, procedures and practices.
- An assessment of how those laws and regulations affect the location, availability, and accessibility of housing.
- An assessment of conditions, both public and private, affecting fair housing choice for all protected classes.
- An assessment of the availability of affordable, accessible housing in a range of unit sizes.

Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices or the availability of housing choice.
- Any actions, omissions, or decisions that have the effect of restricting housing choices or the availability of housing choice based on race, color, religion, sex, disability, familial status or national origin.

Policies, practices or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability, and families with children may constitute such impediments. Impediments to fair housing choice include actions or omissions in an entitlement jurisdiction that:

- Constitute violations, or potential violations, of the Fair Housing Act;
- Are counter-productive to fair housing choice, such as:
 - Community resistance when minorities, persons with disabilities, and/or low-income persons first move into white and/or moderate to high income areas.
 - Community resistance to the siting of housing facilities for persons with disabilities because of the persons who will occupy the housing.
- Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

II. METHODOLOGY

The AI has been conducted by the Manchester Planning Department in accordance with the Federal Department of Housing and Urban Development (HUD) guidelines. The AI relies heavily on data from the 2005-2010 Consolidated Plan for Housing and Community Development as well as data from the US Census, the Connecticut Department of Labor, and other sources. This plan was developed in consultation with the Manchester Housing Commission (MHC). MHC members, along with staff from local housing and service agencies and town staff, were invited to a meeting on July 13, 2006 and a second meeting held on October 5, 2006. Those who attended the July meeting discussed issues directly related to fair housing in Manchester including demographic and income trends; housing availability, options and costs; market changes; housing needs; and perceived discrimination. The group identified potential impediments to fair housing in Manchester and suggested possible actions to address them. At the October 5, 2006 meeting, participants discussed the findings and suggested further actions to address fair housing issues. Additionally, interviews were conducted with the staff of several groups concerned with fair housing issues in the Manchester community. Those interviewed included other town departments, local nonprofits and representatives from the real estate community (See Appendix II). A list of those individuals who attended those meetings and minutes of those meetings can be found in Appendix I.

III. FINDINGS

This analysis found there are some barriers to fair housing in Manchester. Manchester will likely have difficulty housing its aging low and moderate income population over the next few decades. Many senior adults living on fixed incomes may be unable to afford the anticipated property tax increases resulting from rising housing values over the past six years. Although the recent trend of age-restricted housing developments has yielded a modest number of units for senior housing, these units are not more affordable, and in most cases less affordable, than the current living situations for many seniors.

Additionally, the supply of such units has not kept up with demand, further contributing to rising prices. The units which have been developed have been sold at market rates, which remain out of the price range of many Manchester seniors.

The current distribution of minority and low income households reflects Manchester's historic development pattern, housing market cycles, and federal and local policy decisions. Manchester developed from its center outward and today, the central neighborhoods (built between 1890 and 1920) contain older housing stock and large percentages of low/moderate income and minority families. (See maps 1, 2, 8 and 10). Manchester's most central census tract has the oldest housing stock (average year built 1939), the largest percentage of rental units (85%), low median household income (\$34,942) and a percentage of minority groups above the town average (26% vs 18%).

In contrast, Manchester's newer peripheral neighborhoods have newer housing stock, lower percentages of rental units, higher median incomes, and smaller percentages of minority populations. Tract 5152, for example, contains newer housing (average year built 1975), a low percentage of renter occupied housing (3%), a high median income (\$84,387) and a relatively low percentage of minority residents (7%). Contrasts like this were prevalent in this analysis and indicate the strong connection between housing age, market rate rental units, income, and minority population.

Large, publicly assisted family housing projects were built in the 1970s and 1980s along areas of high traffic volumes, most notably along Oakland Street to the north and Spencer Street to the west. While the central neighborhoods contain many larger single family or multi-family houses built on smaller lots, many of the immediately surrounding neighborhoods include smaller single family houses. The southern and eastern areas of town have been more recently developed into primarily large, single family housing on large lots. The past two decades have also seen higher-end rental and condominium development in the northern section of town and in the rehabilitation of the historic Cheney area. Additionally, the Section 8 housing voucher program has allowed lower income households to move into the central neighborhoods, where aging housing has kept rental rates comparatively low.

It does not appear that overt landlord discrimination is a problem in Manchester, although there is anecdotal evidence that individuals discriminate in isolated cases. Most often, when these few landlords do discriminate, they do so on the basis of a tenant's source of income or familial status. The Connecticut Fair Housing Resource Center reported four such complaints in 2005.

In analyzing income and demographic trends, there appears to be some segregation along income and ethnic lines throughout Manchester. Some year 2000 census tracts had median household incomes as high as \$91,332, other tracts had a median of \$33,720. Similarly some census tracts had percentages of minorities as low as 4%, others had percentages as high as 58%. This could indicate some racial steering, either intentional or unintentional, by the real estate community. More likely, though, the concentrations of minority and low income groups in certain sections of town are the result of the lack of affordable units in other neighborhoods. Less expensive housing is available in Manchester's older, central neighborhoods. This has created concentrations of lower income residents in older housing and in these neighborhoods, which also have higher concentrations of minority families. There exists, then, a correlation between income, race, housing age and housing price in Manchester. This pattern has continued and appears to have intensified since the last AI was completed in 1996.

Stagnant wages and rising rental costs make it difficult for very low income residents to afford any type of housing in Manchester. Although group homes and assisted living programs exist in town, there are not enough units to satisfy demand. Down payment and security deposit requirements make housing prohibitive to very low wage earners.

Current zoning regulations do not compel developers to build affordable housing units in Manchester. High land and development costs and high demand, most of the rental and ownership housing being built in town is expensive. Much of the remaining developable, residentially zoned land in Manchester is being developed as large, single family houses on large lots. In some areas there are no public utilities, in particular sanitary sewer systems which can limit development options. These houses are not affordable to middle and low income families. Most of the affordable housing in town then, exists in the older, central neighborhoods where zoning allowed for residential structures on smaller lots, and allowed multi-family housing.

IV. IMPEDIMENTS AND ACTION PLAN

IMPEDIMENT: *THERE ARE NOT ENOUGH AFFORDABLE HOUSING UNITS FOR THE ELDERLY TO MEET CURRENT AND FUTURE DEMAND.*

- **ACTION:** Consider amending the Town's zoning regulations to provide a density bonus and/or flexible development standards (e.g. lot size, unit size, etc.) in the Elderly Housing Development and Planned Residence Development zones, in exchange for a developer building some minimum percentage of the units as affordable to the elderly.
- **ACTION:** Consider entering into development partnerships with the Manchester Housing Authority and nonprofit developers to build affordable elderly housing. The Town's contribution could be in the form of tax assessment agreements, tax incentives, or state or federal grant funds or loans the Town can secure to assist with development costs.

IMPEDIMENT: *SOME LANDLORDS ARE DISCRIMINATING AGAINST POTENTIAL TENANTS BASED ON SOURCE OF INCOME AND FAMILIAL STATUS.*

- **ACTION:** Organize a fair housing conference targeted to landlords, property managers, and realtors focused on their legal rights and responsibilities regarding the provision of fair housing, fair housing laws, and landlord and tenant rights .

IMPEDIMENT: *THE INITIAL COSTS OF SECURITY DEPOSITS FOR RENTAL HOUSING OR DOWN PAYMENTS AND CLOSING COSTS FOR OWNER HOUSING MAKES HOUSING UNAFFORDABLE FOR SOME RESIDENTS.*

- **ACTION:** Consider implementing a security deposit and/or down payment and closing cost assistance program. Such a program would make it easier for low-income residents to either secure rental housing or buy a home by providing for a portion of a security deposit or down payment/closing cost.

IMPEDIMENT: *LIMITED PRODUCTION OF, OR OPPORTUNITIES FOR, AFFORDABLE HOUSING IN SOME AREAS OF MANCHESTER RESULTS IN A CONCENTRATION OF LOW INCOME AND MINORITY POPULATIONS IN THE NORTHERN, CENTRAL AND WESTERN NEIGHBORHOODS.*

- **ACTION:** Investigate developing an inclusionary zoning ordinance to encourage opportunities for affordable housing in neighborhoods with higher income levels. An inclusionary zoning ordinance could apply to all development proposals over a specified number of units, and provide a density bonus or other incentives to help underwrite the development costs of the affordable units in a project.

- **ACTION:** Consider using financial incentives available to the Town to promote the development of affordable units. Incentives could include historic tax credits, tax assessment agreements, and state and federal grants or loans to provide gap financing for the development of affordable housing.

IMPEDIMENT: *THERE ARE LIMITED HOUSING OPPORTUNITIES FOR THE HOMELESS, THOSE AT RISK OF HOMELESSNESS, AND SPECIAL NEEDS POPULATIONS.*

- **ACTION:** Examine the zoning regulations to determine if a new definition for supportive housing is necessary; define supportive housing; determine which zoning districts this type of housing should be permitted, either as a permitted use or a special exception use.
- **ACTION:** Consider amending the zoning regulations to allow single room occupancy (i.e. rooming units) as a permitted or special exception use in selected zoning districts, either as independent living units or as supportive housing.

V. JURISDICTIONAL BACKGROUND DATA

Population

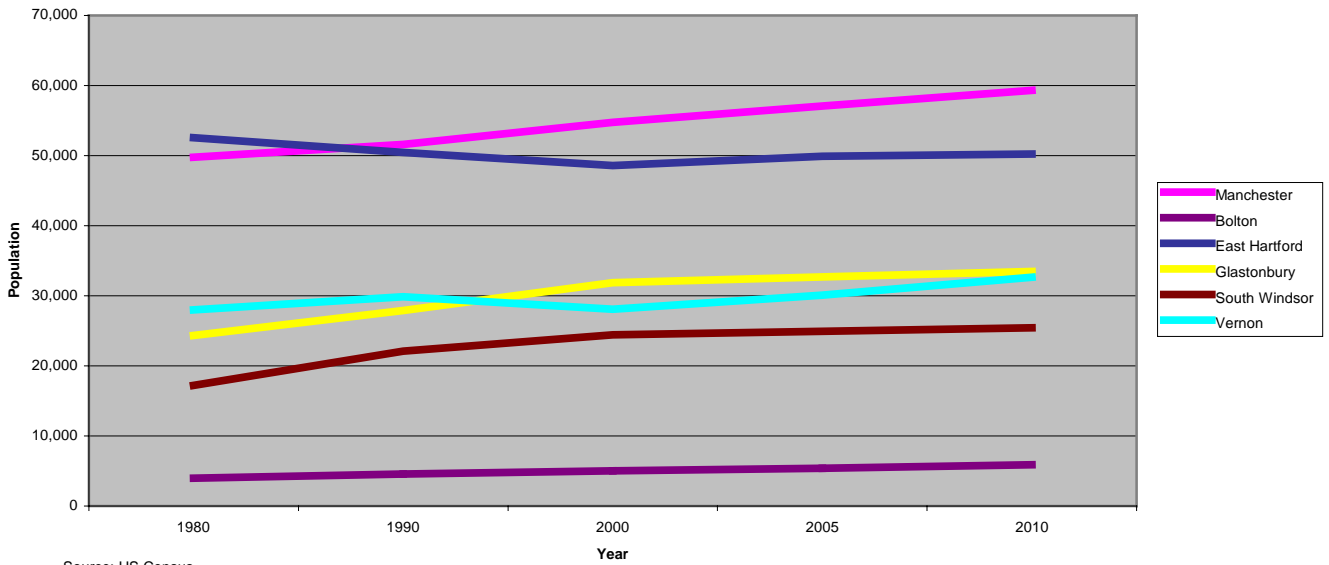
Manchester continues to grow in population at a rate comparable to those at regional and state levels (See Table A). Growth continues to decline from 1990s levels, but remains positive, unlike in several towns in the Manchester area. Compared to nearby towns including Bolton, East Hartford, Glastonbury, Manchester, South Windsor and Vernon, Manchester continues to have the highest population.

Manchester's growth rate of 4.3% between 2000 and 2005 is close to the regional average of 4.4% (See Table A, Chart 1). Manchester's rate of growth has remained relatively consistent since the 1980s. The town grew by 3.7% from 1980-1990, by 6% from 1990 to 2000 and by 4.3% from 2000 to 2005. Manchester is expected to grow another 3.9% between 2005 and 2010. Growth in other nearby towns, in contrast, has been more volatile. South Windsor's population growth, for example, fell from 28.4% between 1980 and 1990 to 10.5% between 1990 and 2000 to 2.1% between 2000 and 2005. Vernon lost 6% of its population between 1990 and 2000, but saw 7.3% growth from 2000-2005. Between 2000 and 2005, average household size in Manchester rose slightly from 2.32 to 2.35 people per household.

TABLE A: POPULATION IN THE MANCHESTER AREA: 1980-2005 AND 2010 PROJECTED									
	1980	1990	% Change 1980- 1990	2,000	% Change 1990- 2000	2005	% Change 2000- 2005	2010 Projected	% Change 2005-2010 Projected
Connecticut	3,107,576	3,287,116	5.8%	3,405,565	3.6%	3,534,280	3.8%	3,656,299	3.5%
Manchester	49,761	51,618	3.7%	54,740	6.0%	57,079	4.3%	59,317	3.9%
Bolton	3,951	4,575	15.8%	5,017	9.7%	5,393	7.5%	5,887	9.2%
East Hartford	52,563	50,452	-4.0%	48,575	-3.7%	49,902	2.7%	50,228	0.7%
Glastonbury	24,327	27,901	14.7%	31,876	14.2%	32,675	2.5%	33,457	2.4%
South Windsor	17,198	22,090	28.4%	24,412	10.5%	24,925	2.1%	25,428	2.0%
Vernon	27,974	29,841	6.7%	28,063	-6.0%	30,106	7.3%	32,669	8.5%

Source: US Census

Chart 1: Population Change 1980-2010 (2010 projected)



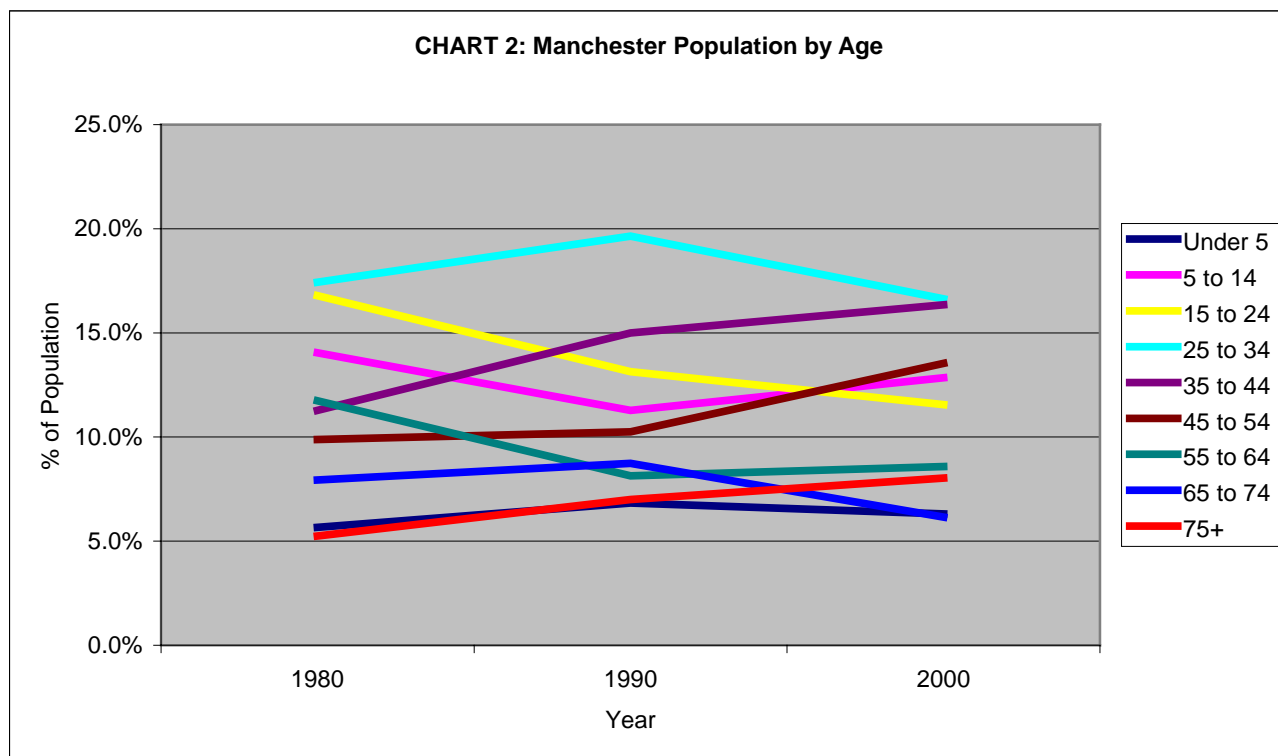
Age

In terms of age, Manchester's population is largely composed of persons aged 25 to 54, but that percentage is declining (See Table B, Chart 2). Whereas this age group comprised 44.8% of the town's population in 1990, it made up 46.5% in 2000. The percentage of school-aged children (ages 5-14) rose slightly from 11.3% in 1990 to 12.8% in 2000. Conversely, the over 65 population has fallen in relation to the entire population. Whereas persons aged 65+ made up 16.4% of the town population in 1990, the age group made up only 14.2% in 2000. However, the older end of this demographic has grown. The 75 and over population rose from 7% in 1990 to 8% in 2000.

Also notable, the 15-44 age population declined from 47.7% to 44.6% of the town's total population from 1990 to 2000. This age range contains most of the house buying and renting population. This trend, coupled with the increase of the 75+ population could mean a shortage of buyers and or renters for vacant Manchester homes.

TABLE B: POPULATION BY AGE						
	Number of Persons 1980	% of Population 1980	Number of Persons 1990	% of Population 1990	Number of Persons 2000	% of Population 2000
Under 5 years	2,820	5.7%	3,524	6.8%	3,452	6.3%
5 to 14 years	6,992	14.1%	5,821	11.3%	7,034	12.8%
15 to 24 years	8,350	16.8%	6,780	13.1%	6,326	11.6%
25 to 34 years	8,674	17.4%	10,139	19.6%	9,101	16.6%
35 to 44 years	5,608	11.3%	7,739	15.0%	8,955	16.4%
45 to 54 years	4,914	9.9%	5,287	10.2%	7,407	13.5%
55 to 64 years	5,840	11.7%	4,204	8.1%	4,702	8.6%
65 to 74 years	3,949	7.9%	4,510	8.7%	3,370	6.2%
75+	2,614	5.3%	3,614	7.0%	4,393	8.0%
Total	49,761	100.0%	51,618	100.0%	54,740	100.0%

Source: US Census



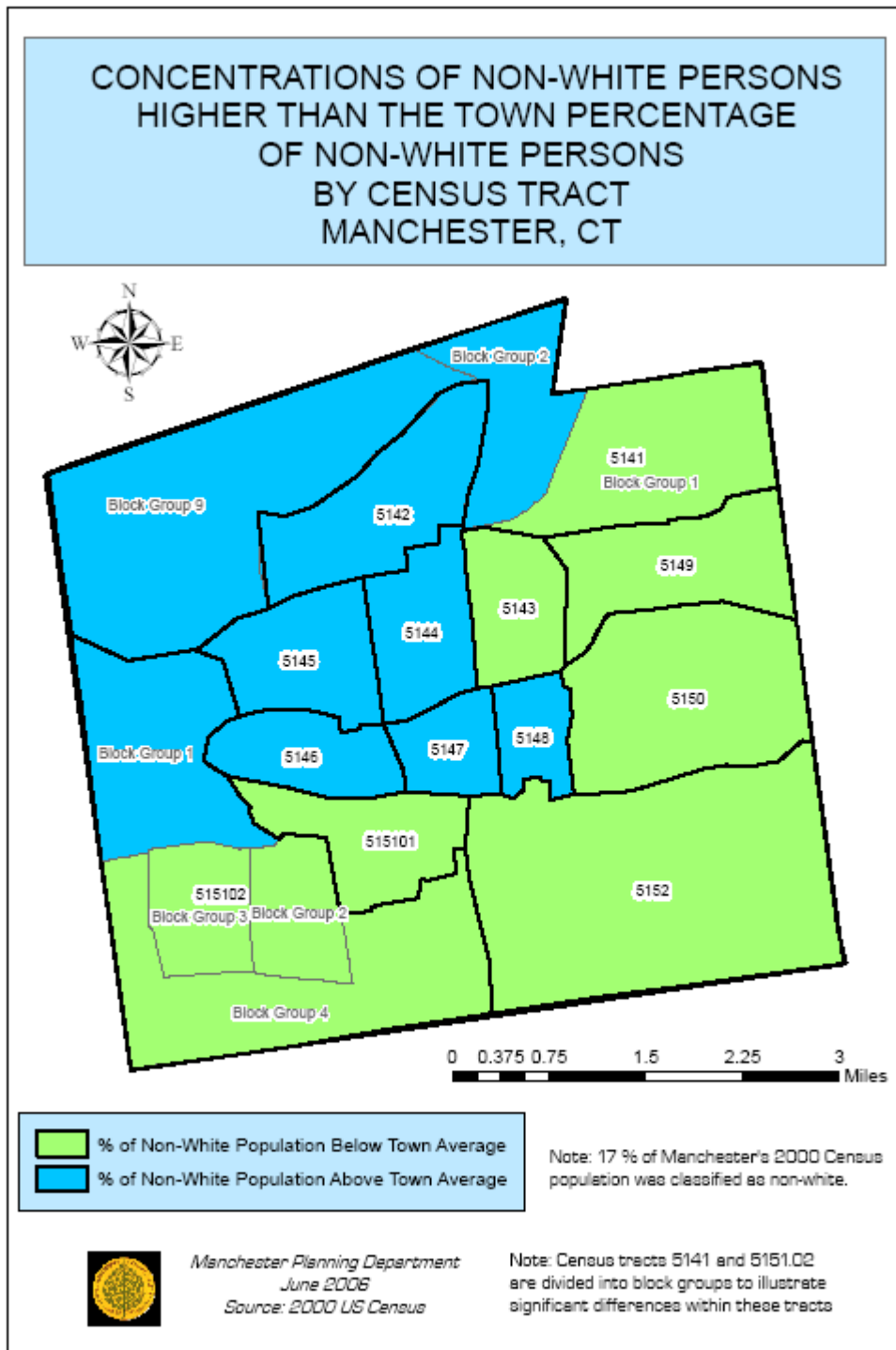
Diversity

Manchester continues to become a more racially diverse community. Whereas in 1990, 93.5% of town residents identified themselves as white, 82.8% did so in 2000 (See Table C). The total number of white persons also fell by 2,955 during the same time period while the Black/African American population more than doubled, from 2,005 in 1990 to 4,610 in 2000. During that time, the percentage of persons who identified themselves as Black or African/American rose from 3.9% to 8.4% of the town total. The Hispanic/Latino population almost tripled from 1990 to 2000, going from 1,229 residents in 1990 to 3,579 residents in 2000. This constituted an increase from 2.4% to 6.5% of the town population.

	White	Black/African American	American Indian	Asian	Pacific Islander	Other	Two or More Races	Hispanic/Latino	Total Population
1980 Population	47,732	996	36	220	NA	264	NA	523	49,761
% of 1980 Population	95.9%	2.0%	0.1%	0.4%	NA	0.5%	NA	1.1%	
1990 Population	48,262	2,005	101	869	NA	381	NA	1,229	51,618
% of 1990 Population	93.5%	3.9%	0.2%	1.7%	NA	0.7%	NA	2.4%	
2000 Population	45,307	4,610	107	1,726	18	1,706	1,266	3,579	54,740
% of 2000 Population	82.8%	8.4%	0.2%	3.2%	0.0%	3.1%	2.3%	6.5%	

Map 1 illustrates concentrations of minority groups higher than the town average of 17%. Census tracts with minority concentrations over 17% were located in the northern, central and western parts of town.

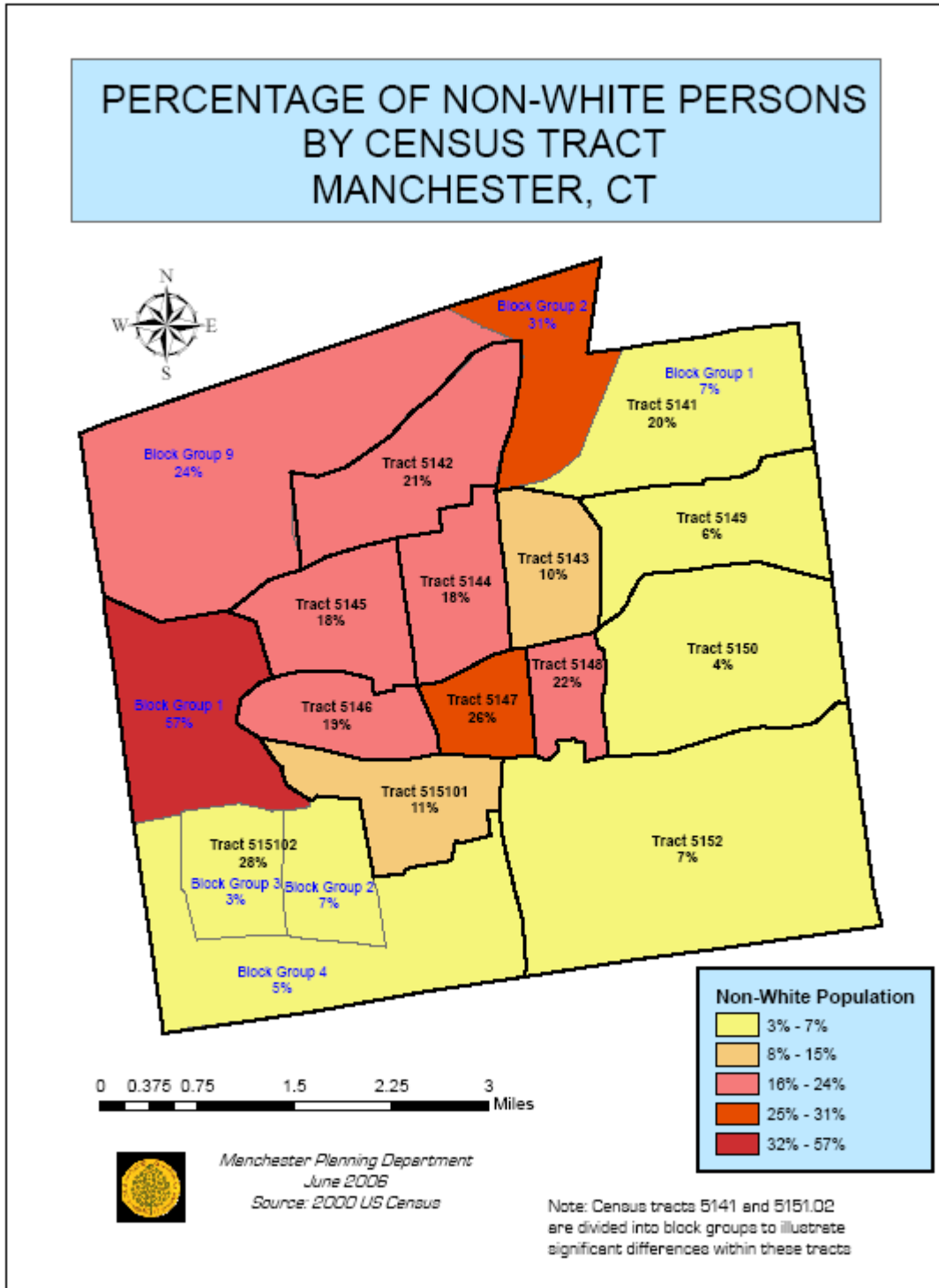
Map 1



Map 2 indicates that minority groups are highly concentrated in several census tracts and block groups. Tract 5147 and Tract 515102 Block Group 1 and Tract 5141 Block Group 2 all had percentages of minorities of 25% or more. In contrast, three Tracts,

5149, 5150 and 5152 had less than 10% minority populations, as do Block Groups 2, 3, and 4 in Tract 515102.

Map 2

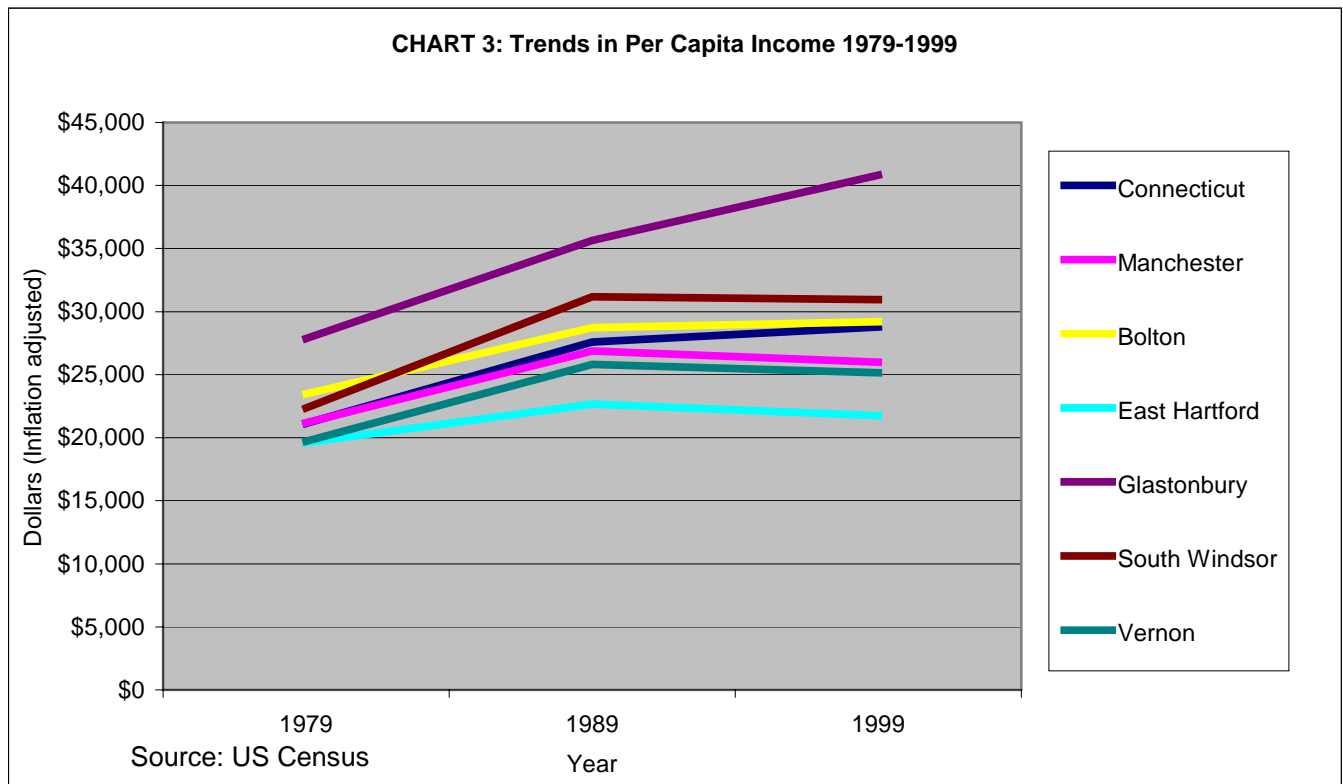


INCOME

After a significant increase in the 1980s, per capita income in Manchester fell by 3% (in 1999 dollars) from 1989 to 1999 (see Table D, Chart 3). During the same period, per capita income in the state rose 4%. During that ten year period, the purchasing power of Manchester residents fell, negatively affecting a household's ability to afford the same level of housing.

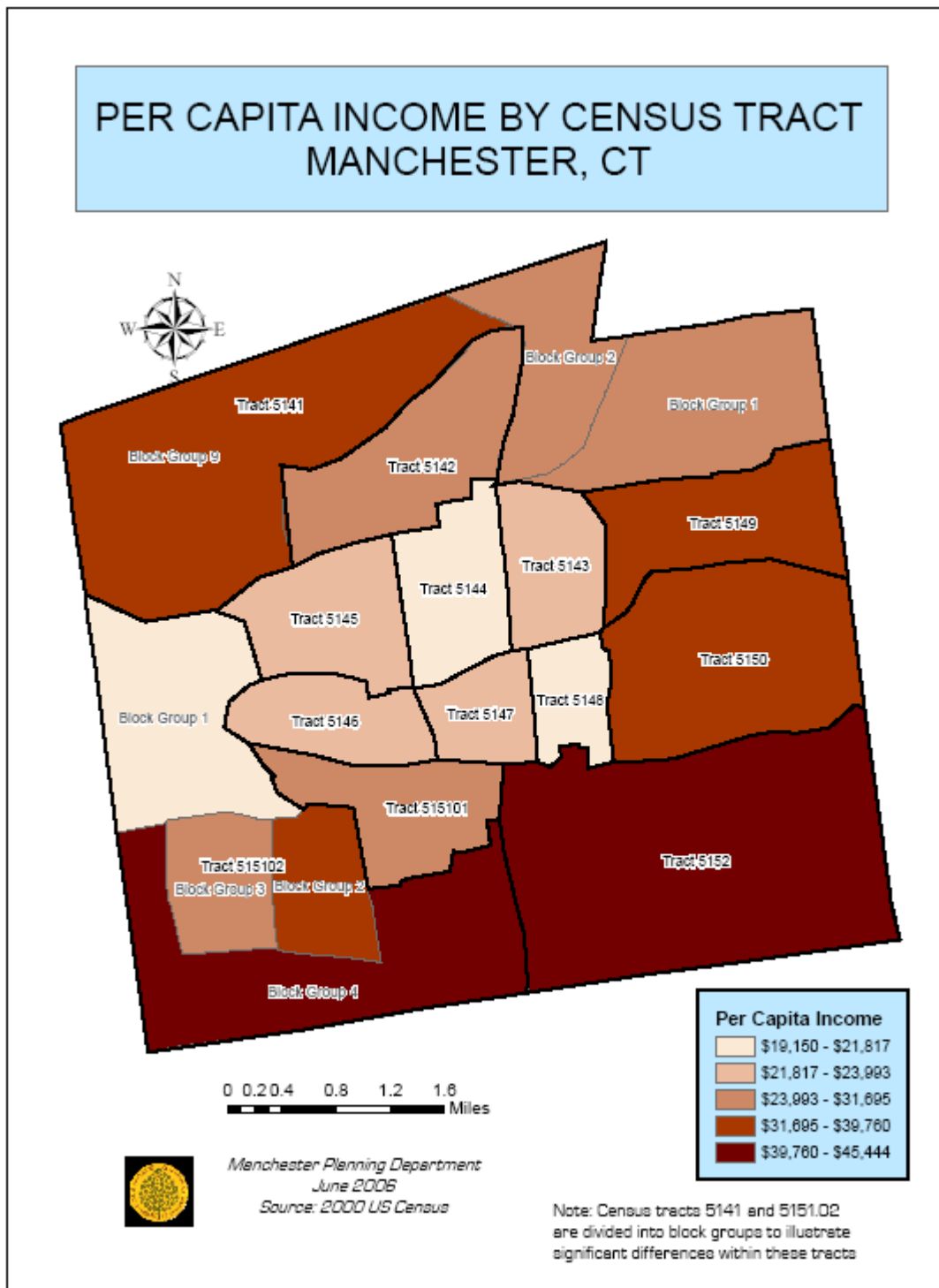
TABLE D: TRENDS IN PER CAPITA INCOME						
	1979	in 1999 Dollars	1989	In 1999 Dollars	1999	% Increase/Decrease
Connecticut	\$8,511	\$21,131	\$20,189	\$27,592	\$28,766	4%
Manchester	\$8,537	\$21,196	\$19,654	\$26,861	\$25,989	-3%
Bolton	\$9,454	\$23,473	\$21,017	\$28,724	\$29,205	2%
East Hartford	\$7,948	\$19,632	\$16,575	\$22,653	\$21,763	-4%
Glastonbury	\$11,224	\$27,867	\$26,073	\$35,633	\$40,820	15%
South Windsor	\$9,002	\$22,350	\$22,823	\$31,192	\$30,966	-1%
Vernon	\$7,948	\$19,734	\$18,888	\$25,814	\$25,150	-3%

Source: US Census

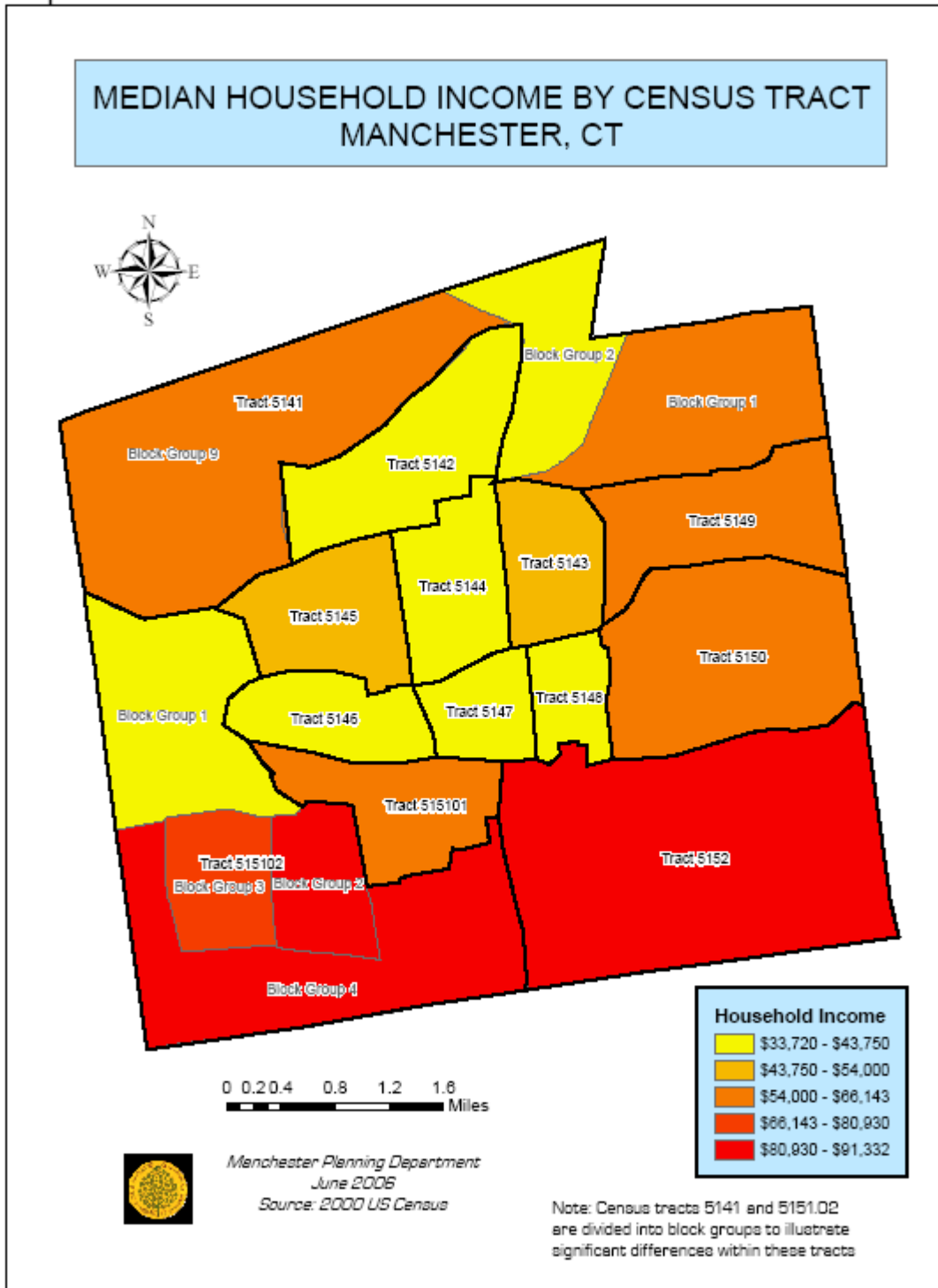


Low income individuals and households are concentrated in patterns similar to those of race. Areas with lower median household and per capita incomes are located in the central and western regions of town (See Map 3 and Map 4).

Map 3



Map 4



In looking at income by race in Manchester, White and Asian households earn significantly more than African/American and Latino Households. Whereas the average White, Asian, and Hispanic household income rose from 1990 to 2000, the average African-American household income fell (See Table E, Chart 4). In comparison to the

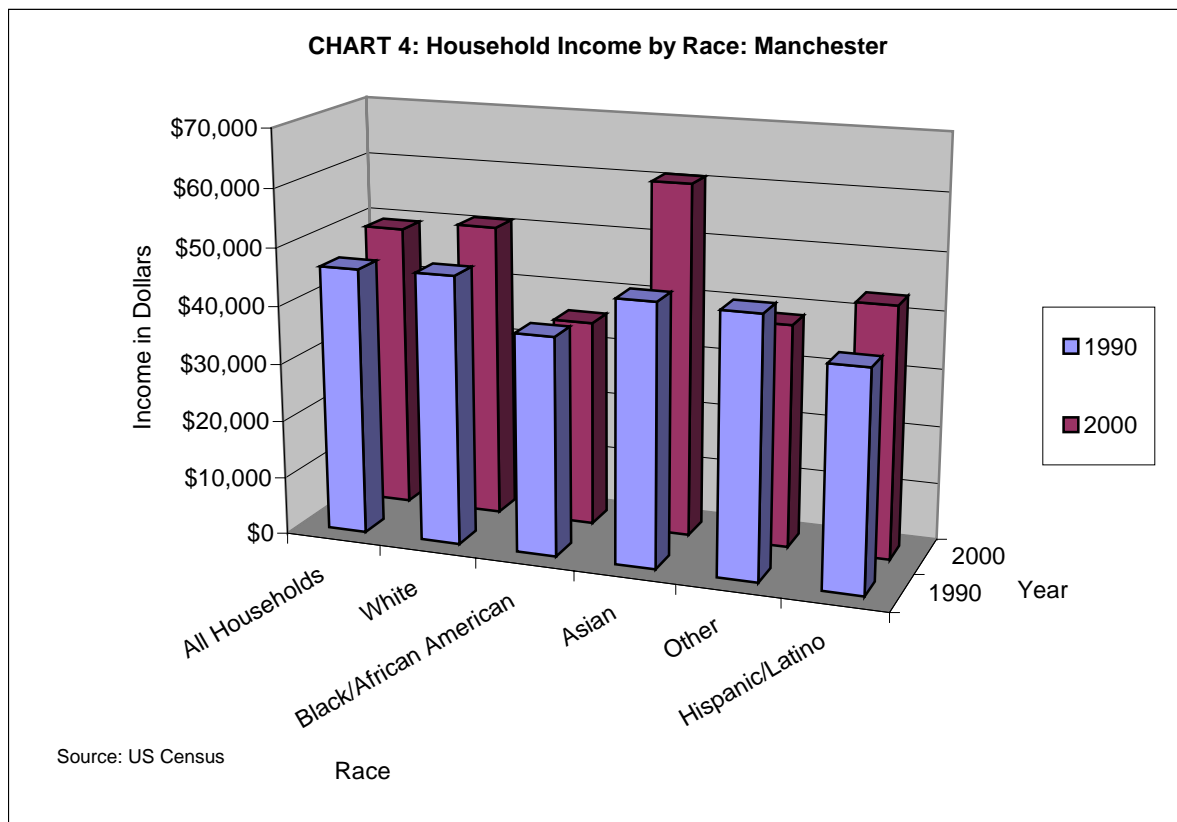
region as a whole, White and Asian households in Manchester on average made less than white and Asian households across the region. African-American households in Manchester had incomes comparable to African-American families throughout the region, while Hispanic/Latino households in Manchester had significantly more income compared to Hispanic/Latino households throughout the region.

TABLE E: HOUSEHOLD INCOME BY RACE

	All Households	White	Black/African American	American Indian	Asian	Pacific Islander	Other	Two or More Races	Hispanic/Latino
Manchester 1990	\$46,160	\$46,496	\$37,790	NA	\$45,123	*	\$44,755	NA	\$37,699
Manchester 2000	\$49,426	\$50,993	\$35,777	NA	\$60,919	NA	\$38,571	\$40,050	\$43,375
Connecticut 1990	\$53,253	\$55,427	\$33,873	NA	\$62,805	*	\$37,928	NA	\$30,883
Connecticut 2000	\$53,935	\$57,518	\$35,104	\$37,078	\$61,587	\$60,536	\$28,631	\$36,186	\$32,075
Hartford County 1990	\$49,262	\$52,180	\$31,959	NA	\$54,462	*	\$22,829	NA	\$25,832
Hartford County 2000	\$50,756	\$55,557	\$34,416	\$24,148	\$56,071	NA	\$23,526	\$33,729	\$26,302

Source: US Census

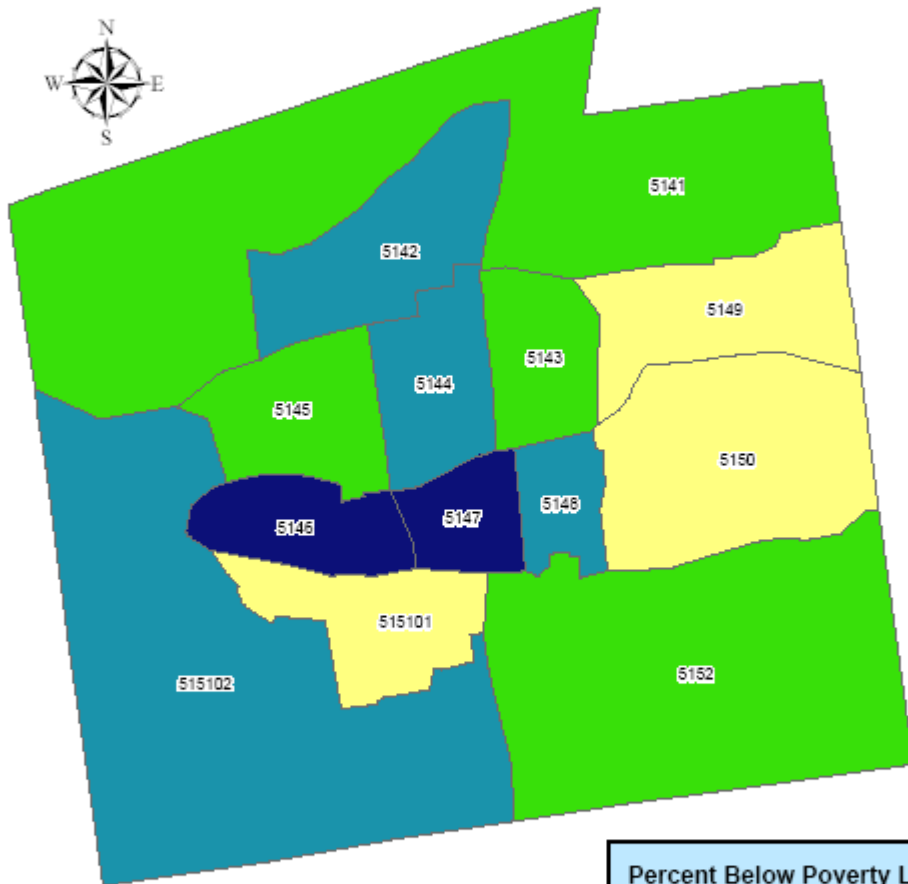
* Pacific Islander category was combined with Asian category in 1990 census



The percentage of Manchester residents considered to be living below the poverty line more than doubled between 1990 (3.8%) and 2000 (7.8%) (See table F, Chart 5). The percentage was lower than that of the Hartford region (9%). While the percentage of African-Americans (17.8%) and Latinos (14.9%) living below the poverty line was lower than for the region as a whole (18.7% and 29.6% respectively), the percentage of whites (5.7%) and Asians (16.2%) below the poverty line was greater than the regional average (5.9% and 8.2% respectively). Much of the poverty in town is concentrated in the central and western neighborhoods (See Map 5).

Map 5

PERCENTAGE OF POPULATION BELOW POVERTY LEVEL BY CENSUS TRACT MANCHESTER, CT



0 0.375 0.75 1.5 2.25 3 Miles



Manchester Planning Department
June 2006
Source: 2000 US Census

Percent Below Poverty Line

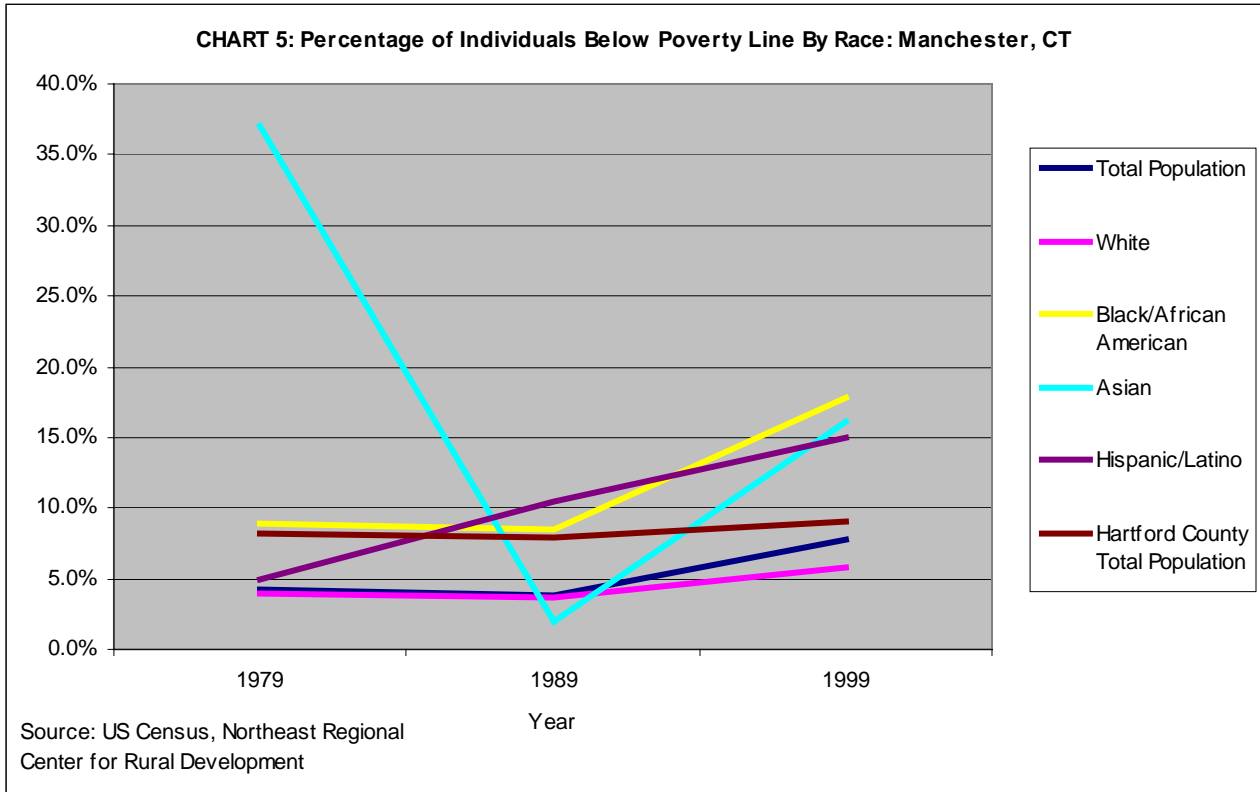
- 1% - 2%
- 3% - 6%
- 7% - 13%
- 14% - 18%

Note: Census tracts 5141 and 5151.02 are divided into block groups to illustrate significant differences within these tracts

TABLE F: INDIVIDUALS BELOW POVERTY LEVEL BY RACE

		All Individuals	White	Black/African American	American Indian	Asian	Other	Two or More Races	Hispanic/Latino
1980	Manchester: Individuals Below Poverty Level	2,049	1,882	77	0	90	NA	NA	27
	Manchester: % Below Poverty Level	4.2%	4.0%	8.9%	0.0%	37.0%	NA	NA	5.0%
	Hartford County: Individuals Below Poverty Level	64,299	NA	NA	NA	NA	NA	NA	NA
	Hartford County: % Below Poverty Level	8.2%	NA	NA	NA	NA	NA	NA	NA
1990	Manchester: Individuals Below Poverty Level	1,964	1,746	174	3	14	27	NA	109
	Manchester: % Below Poverty Level	3.8%	3.6%	8.5%	1.5%	1.9%	7.8%	NA	10.5%
	Hartford County: Individuals Below Poverty Level	65,521	30,637	16,836	294	1,056	16,698	NA	25,827
	Hartford County: % Below Poverty Level	7.9%	4.3%	19.5%	17.0%	8.1%	44.0%	NA	37.1%
2000	Manchester: Individuals Below Poverty Level	4,290	2,595	820	NA	279	390	206	535
	Manchester: % Below Poverty Level	7.8%	5.7%	17.8%	NA	16.2%	22.9%	16.3%	14.9%
	Hartford County: Individuals Below Poverty Level	77,440	33,522	18,689	390	1,790	19,034	3,997	29,344
	Hartford County: % Below Poverty Level	9.0%	5.1%	18.7%	19.7%	8.6%	34.5%	20.2%	29.6%

Source: US Census, Northeast Regional Center for Rural Development



Employment Data:

Manchester continues to lead the Manchester sub-region in terms of total employment. In May of 2006, 30,378 Manchester residents were employed, making up 29% of residents of the Manchester sub-region who were employed. This represents an increase from 27% in May of 1996. In 2000, most town residents worked in Manchester, Hartford or East Hartford.

TABLE G: RECENT TRENDS IN EMPLOYMENT LEVELS							
	May-96	May-01	May-02	May-03	May-04	May-05	May-06
Manchester	26281	27757	29542	29308	29322	29639	30,378
Bolton	2549	2692	2886	2962	2849	2879	2,951
East Hartford	24166	24554	23591	23202	23091	23340	23,922
Glastonbury	14675	15568	16973	16860	16877	17059	17,485
South Windsor	12514	13205	13344	13376	13556	13702	14,044
Vernon	15667	16204	15718	15650	15776	15947	16,344

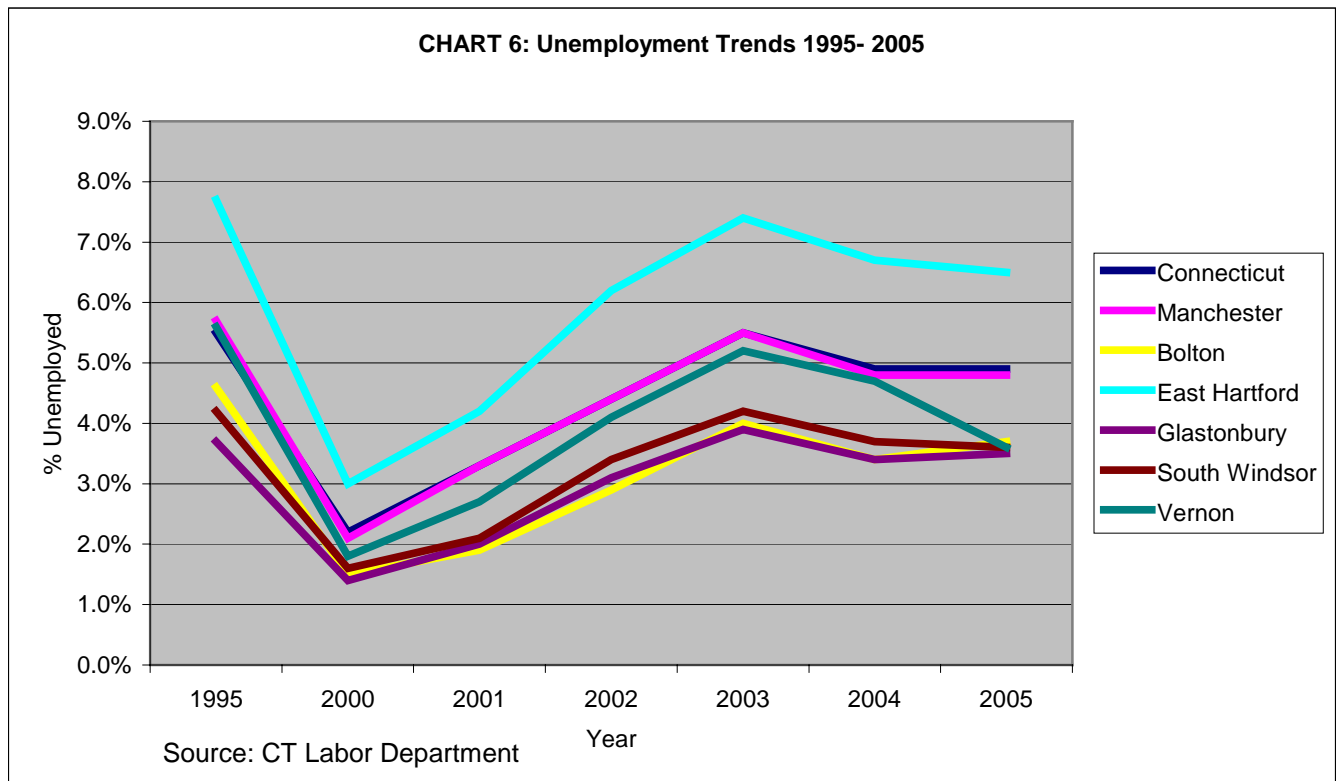
Source: CT Department of Labor

Unemployment levels in Manchester follow the Connecticut state average closely (See Table H, Chart 6). After topping off at 5.5% in 2003, unemployment levels have stayed constant at 4.8% since 2004.

TABLE H: RECENT TRENDS IN UNEMPLOYMENT LEVELS							
	1995	2000	2001	2002	2003	2004	2005
Connecticut	5.5%	2.2%	3.3%	4.4%	5.5%	4.9%	4.9%
Manchester	5.7%	2.1%	3.3%	4.4%	5.5%	4.8%	4.8%
Bolton	4.6%	1.5%	1.9%	2.9%	4.0%	3.4%	3.7%
East Hartford	7.7%	3.0%	4.2%	6.2%	7.4%	6.7%	6.5%
Glastonbury	3.7%	1.4%	2.0%	3.1%	3.9%	3.4%	3.5%
South Windsor	4.2%	1.6%	2.1%	3.4%	4.2%	3.7%	3.6%
Vernon	5.6%	1.8%	2.7%	4.1%	5.2%	4.7%	3.6%

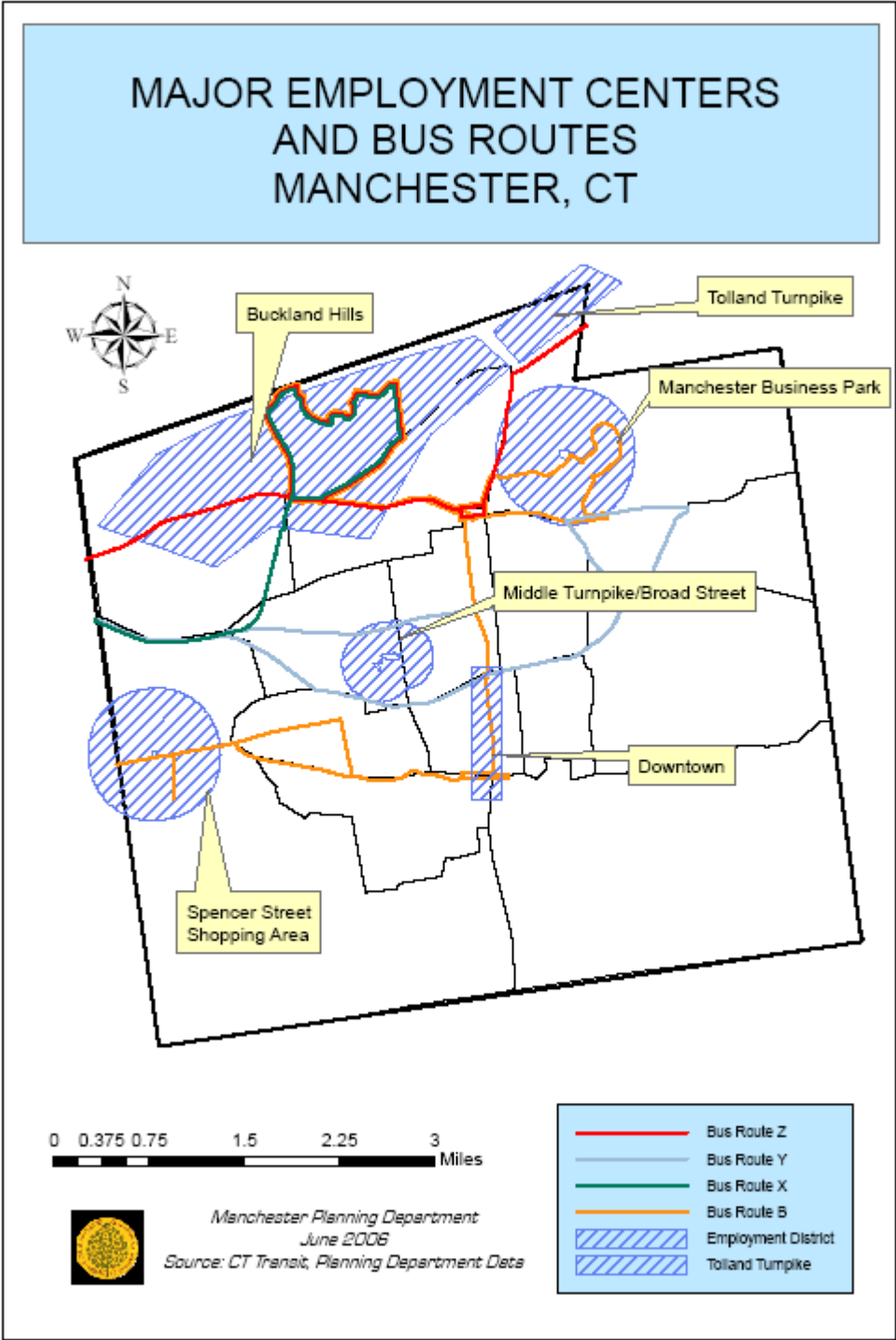
Source: CT Labor Department

*Note: Monthly unemployment statistics are averaged to get a yearly rate



Manchester enjoys a significant amount of business activity, providing one-third of the sub-region jobs in 2005. Although manufacturing jobs in the region have declined over the past several decades, Manchester continues to see increases in retail and service jobs. Several major employment centers provide employment for many residents and are easily accessible by personal and public transportation (See Map 6). Manchester continues to lead the sub-region in number of jobs by a significant margin (See table I). A total of 28,705 people were employed in Manchester in 2004, with retail trade and healthcare industries employing the most workers (CERC).

Map 6



	Jobs	% of Region
Manchester	27,805	33.3%
Bolton	1,275	1.5%
East Hartford	21,092	25.2%
Glastonbury	14,091	16.9%
South Windsor	11,302	13.5%
Vernon	8,024	9.6%
Total	83,589	100.0%

Source: CERC

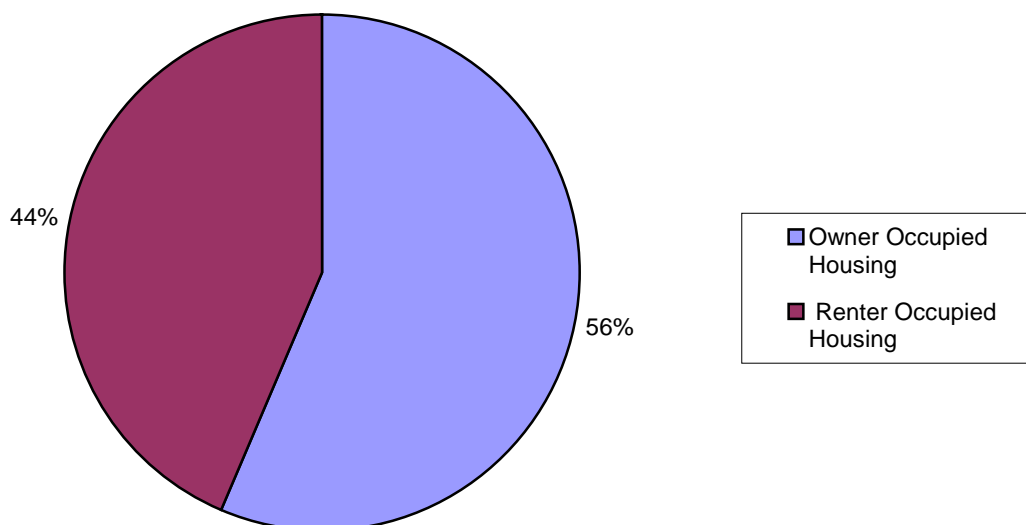
Housing Data:

Manchester's housing stock includes various types of housing, offering options to people of various incomes and tastes. The town has significant levels of both rental and owner-occupied housing (See Chart 7). While 48% of housing structures are single unit, detached houses, significant numbers of all types exist, from two family houses to apartment buildings of 50 units or more (See Table J, Chart 8). Such diversity in housing stock provides numerous housing options to those looking to live in Manchester.

	1 Unit Detached	1 Unit Attached	2 Units	3-4 Units	5-9 Units	10-19 Units	20-49 Units	50+ Units	Mobile Home	Other	Total
Owner Occupied	10,574	1,012	761	111	579	0	0	0	16	0	13,053
% of Owner Occupied	81.0%	7.8%	5.8%	0.9%	4.4%	0.0%	0.0%	0.0%	0.1%	0.0%	100.0%
Renter Occupied	742	520	1,877	1,858	1,398	1,578	880	1,291	0	0	10,144
% of Renter Occupied	7.3%	5.1%	18.5%	18.3%	13.8%	15.6%	8.7%	12.7%	0.0%	0.0%	100.0%
Total Structures	11,316	1,532	2,638	1,969	1,977	1,578	880	1,291	16	0	23,197
% of all Units	48.8%	6.6%	11.4%	8.5%	8.5%	6.8%	3.8%	5.6%	0.1%	0.0%	100.0%

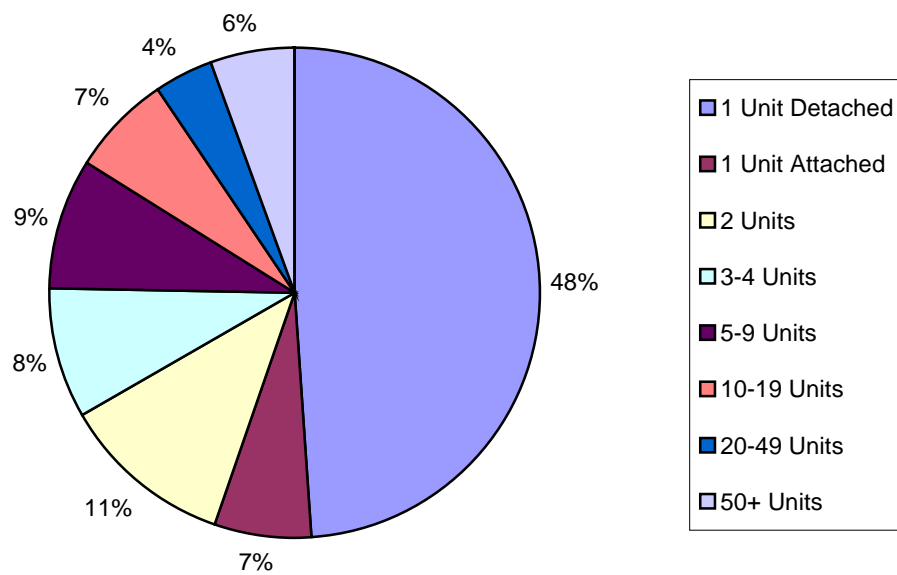
Source: 2000 US Census

CHART 7: Manchester Owner vs Renter Occupied Housing



Source: 2000 US Census

CHART 8: Manchester Housing Structures by Number of Units



Source: 2000 US Census

Although housing of many types exists in Manchester, most housing units (71%) are two or three bedroom units (See table K). While one bedroom units make up 33% of occupied rental units, they make up only 3% of owner-occupied units. Conversely, while

units of four or more bedrooms make up 19% of owner occupied units, such units account for only 2% of the renter occupied units.

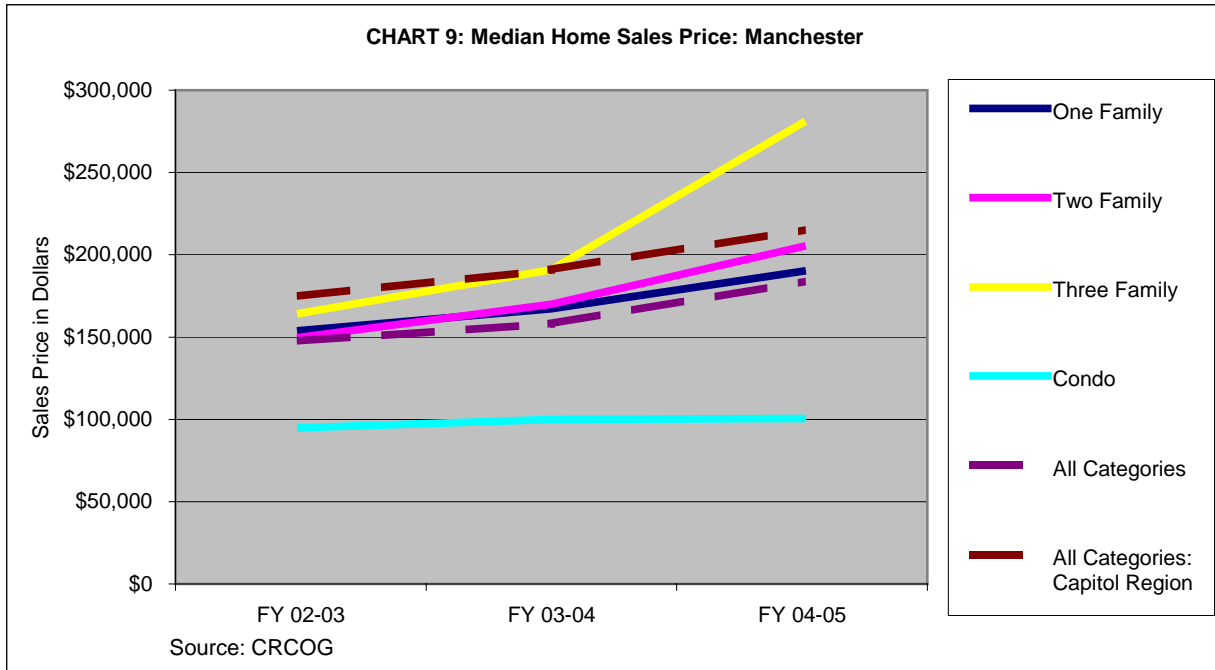
TABLE K: OWNER AND RENTER OCCUPIED HOUSING BY NUMBER OF BEDROOMS							
	0 Bedrooms	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms	5+ Bedrooms	Total
Total Year Round Housing	249	4041	7878	9335	2267	486	24,256
% Total Year Round Housing	1.0%	16.7%	32.5%	38.5%	9.3%	2.0%	100.0%
Renter Occupied	217	3408	4677	1637	127	78	10,144
Owner Occupied	11	356	2781	7416	2098	391	13,053
Total Occupied Units	228	3764	7458	9053	2225	469	23,197
Total Vacant Units	21	277	420	282	42	17	1,059

Source: US Census

Manchester housing prices have increased significantly in recent years (See Table L, Chart 9). While house prices in all categories increased by 23% from FY 02-03 to FY 04-05, three family home prices increased by 70% during the same time period. While condominium prices remained relatively flat during this time, anecdotal evidence suggests that condo prices have also increased significantly since FY 04-05. As a whole, Manchester housing prices have increased at a rate in line with the Capitol region, seeing price increases of 23% during the same period. Average house prices in Manchester remain lower than the average home in the region.

TABLE L: MEDIAN HOME SALES PRICE BY TYPE			
	FY 02-03	FY 03-04	FY 04-05
One Family	\$154,000	\$167,188	\$190,000
Two Family	\$150,000	\$169,900	\$205,000
Three Family	\$164,550	\$191,000	\$280,000
Condo	\$94,950	\$100,000	\$100,500
All Categories	\$147,800	\$158,000	\$183,750
Capitol Region	\$175,000	\$191,000	\$215,000

Source: CRCOG



Data collected in a 2005 survey by the Manchester assessor's office indicates even sharper increases in housing values. According to the study of sales activity between January and October of 2005, the average single family house has appreciated by 65% since 2000. The average single family home appreciated 103% during the same period and condominiums 105%. Appreciation rates have been higher at lower values. Whereas homes valued at \$250,000 and up appreciated by 36.2%, dwellings valued at between \$50,000 and \$99,900 appreciated by 88% and those valued at \$49,900 and under appreciated at 143% (See Chart L.2). This data indicates negative implications for fair housing choice in Manchester. As lower housing values appreciate at higher rates, low and moderate income owners will likely have difficulty paying increased property taxes. Landlords will likely pass on tax and cost increases to tenants, increasing rents and effectively making it more difficult for low and moderated income tenants to stay in their current homes.

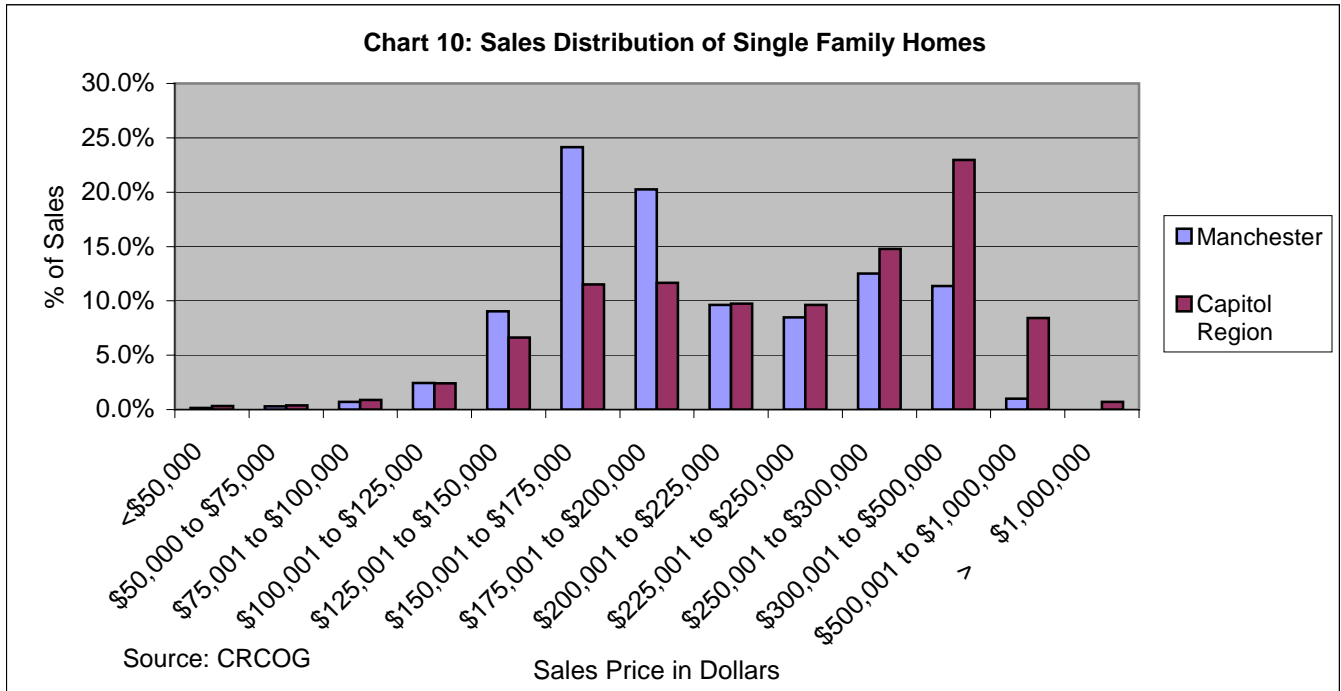
10/1/200 Full Market Value	# of Properties	Percentage of Properties	# of Sales	Average Appreciation Rate
Less than or equal to \$49,900	986	6.1%	85	143.3%
Between \$50,000 and \$99,900	3,187	19.8%	166	88.0%
Between \$100,000 and \$149,900	7,899	49.0%	380	70.9%
Between \$150,000 and \$199,900	2,383	14.8%	94	62.5%
Between \$200,000 and \$249,900	887	5.5%	40	46.7%
Over \$250,000	790	4.9%	34	36.2%
Total	16,132	100.0%	799	

Source: Manchester Assessor's Office

Single family homes in Manchester sell for anywhere from under \$100,000 to over \$500,000 (See Table M, Chart 10). This range in prices further indicates diversity in the town housing market, even for single-family homes. While larger, more expensive housing continues to dominate housing markets in many other towns in the region, Manchester's single-family housing stock includes a variety according to age and size, therefore diversifying price. While the greatest percentage of houses in the region in FY 04-FY05 were sold for \$300,000 to \$500,000, the largest percentage of single-family houses sold in Manchester were sold for \$151,001 to \$175,000. Whereas 63% of single-family housing sales in Manchester were between \$125,001 and \$225,000, the town did also see significant sales activity at higher prices (34% of homes sold at prices above \$225,000).

	<\$50,000	\$50,000 to \$75,000	\$75,001 to \$100,000	\$100,001 to \$125,000	\$125,001 to \$150,000	\$150,001 to \$175,000	\$175,001 to \$200,000	\$200,001 to \$225,000	\$225,001 to \$250,000	\$250,001 to \$300,000	\$300,001 to \$500,000	\$500,001 to \$1,000,000	> \$1,000,000	Total Sales
Manchester	1	2	5	17	63	168	141	67	59	87	79	7	0	696
Manchester %	0.1%	0.3%	0.7%	2.4%	9.1%	24.1%	20.3%	9.6%	8.5%	12.5%	11.4%	1.0%	0.0%	100.0%
Capitol Region	28	33	77	215	587	1,019	1,032	864	853	1,310	2,034	747	63	8862
Capitol Region %	0.3%	0.4%	0.9%	2.4%	6.6%	11.5%	11.6%	9.7%	9.6%	14.8%	23.0%	8.4%	0.7%	100.0%

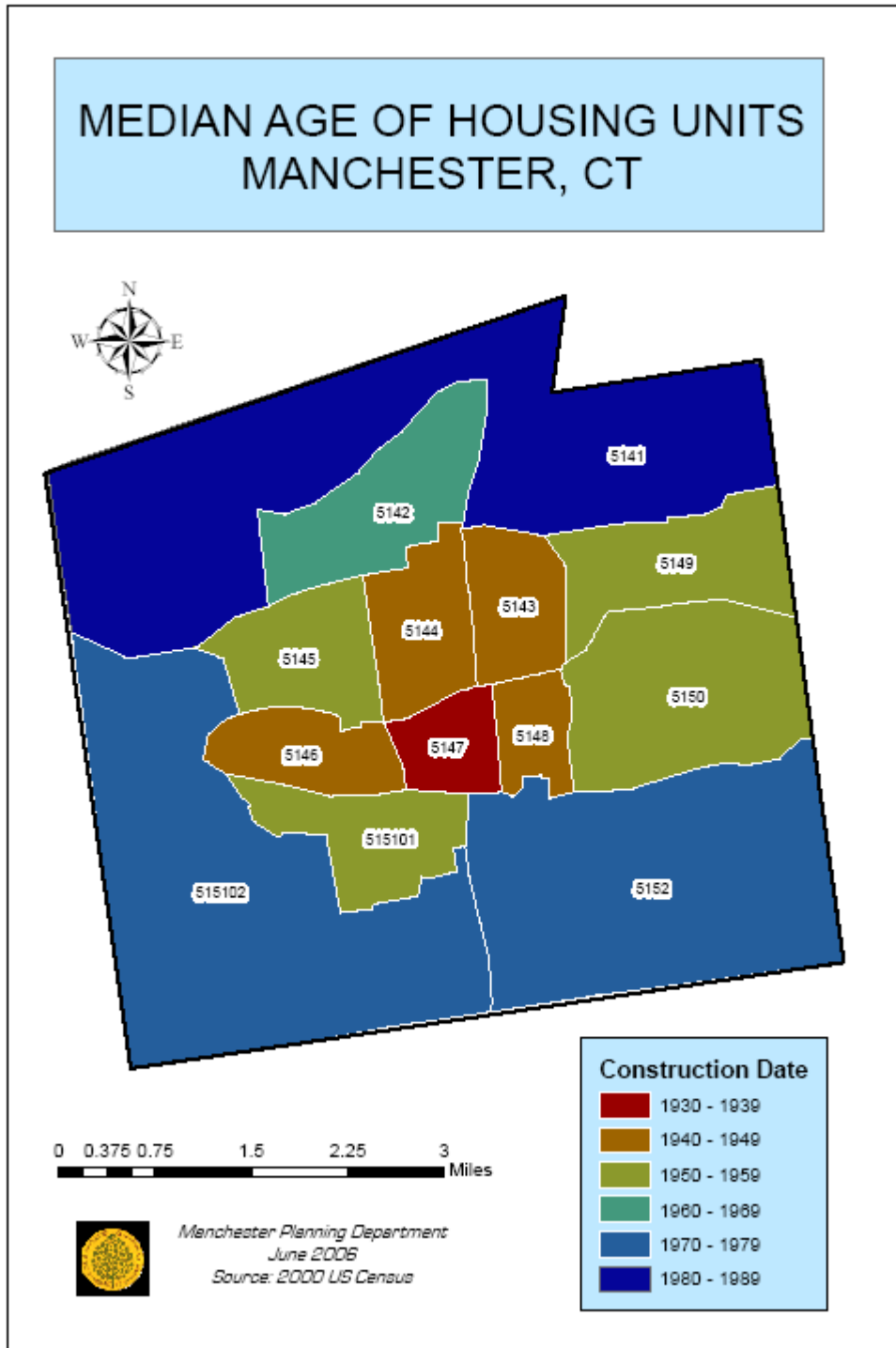
Source: CRCOG



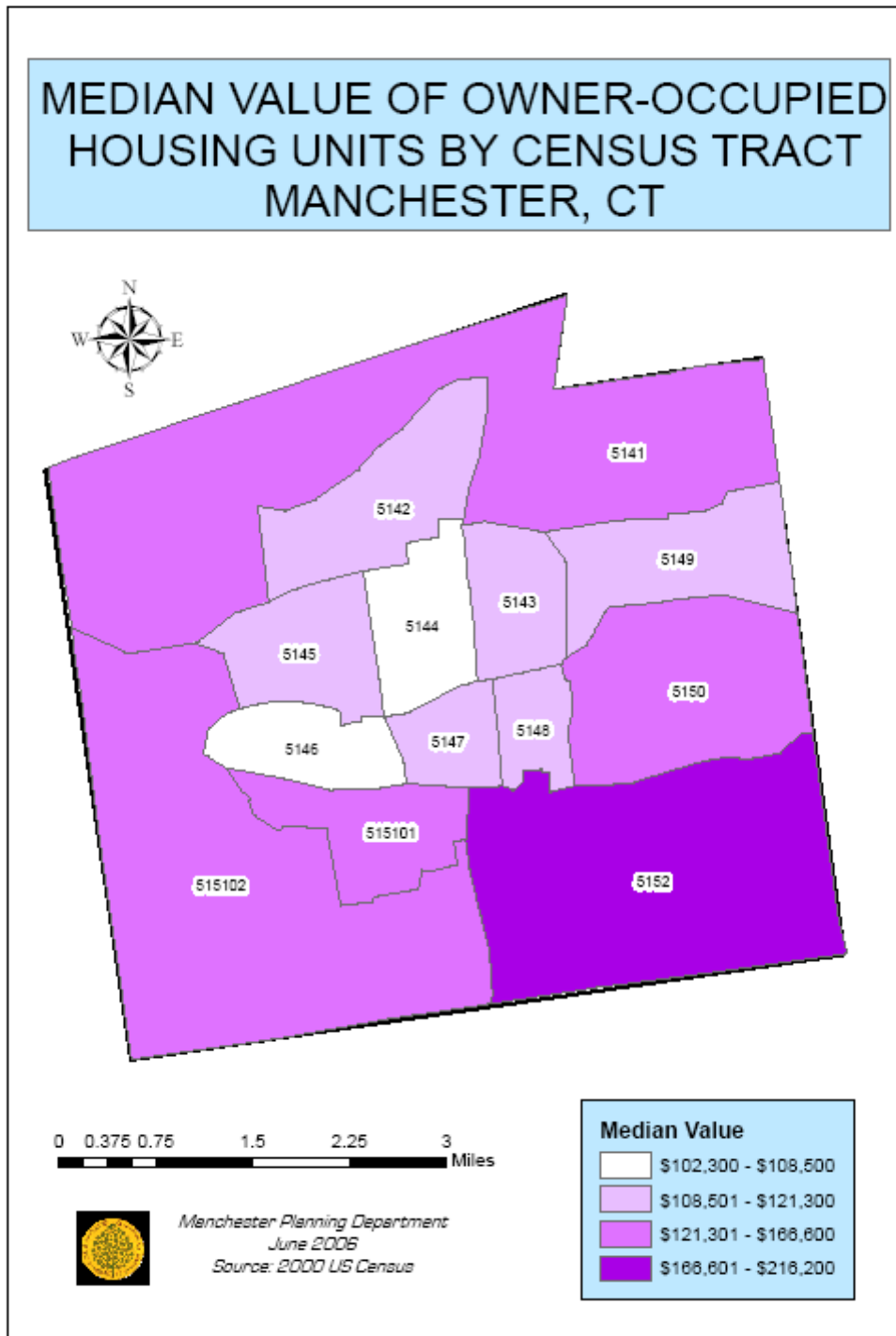
On a day in July, 2006, house listings indicated similar diversity in pricing. Of the 224 residential properties for sale, 118 (53%) of them were in the \$185,000 to \$300,000 range. Of the same 224, twenty-three were for sale for under \$185,000 and 83 were priced at over \$300,000. Two houses were priced at \$1,000,000 or more. Many of the homes over \$300,000 were for newly constructed homes in the southern and eastern parts of the town, where land is still available for construction.

Housing age is also a major issue in the Manchester housing market. While most new construction is occurring in the southern and eastern areas of town, the housing stock in the central neighborhoods is much older (see Map 6b). Because these neighborhoods are already built out, few new houses are built in these neighborhoods. As people of lower incomes continue to move into these neighborhoods, and as rising landlord costs Continue to make repairs more expensive, the older housing stock in these neighborhoods is less well maintained. These neighborhoods, indicated on Map 7, currently have lower housing values. This trend has continued since the completion of the last AI in 1996, which indicated higher values of housing units on the town periphery and lower values in the central neighborhoods.

MAP 6b



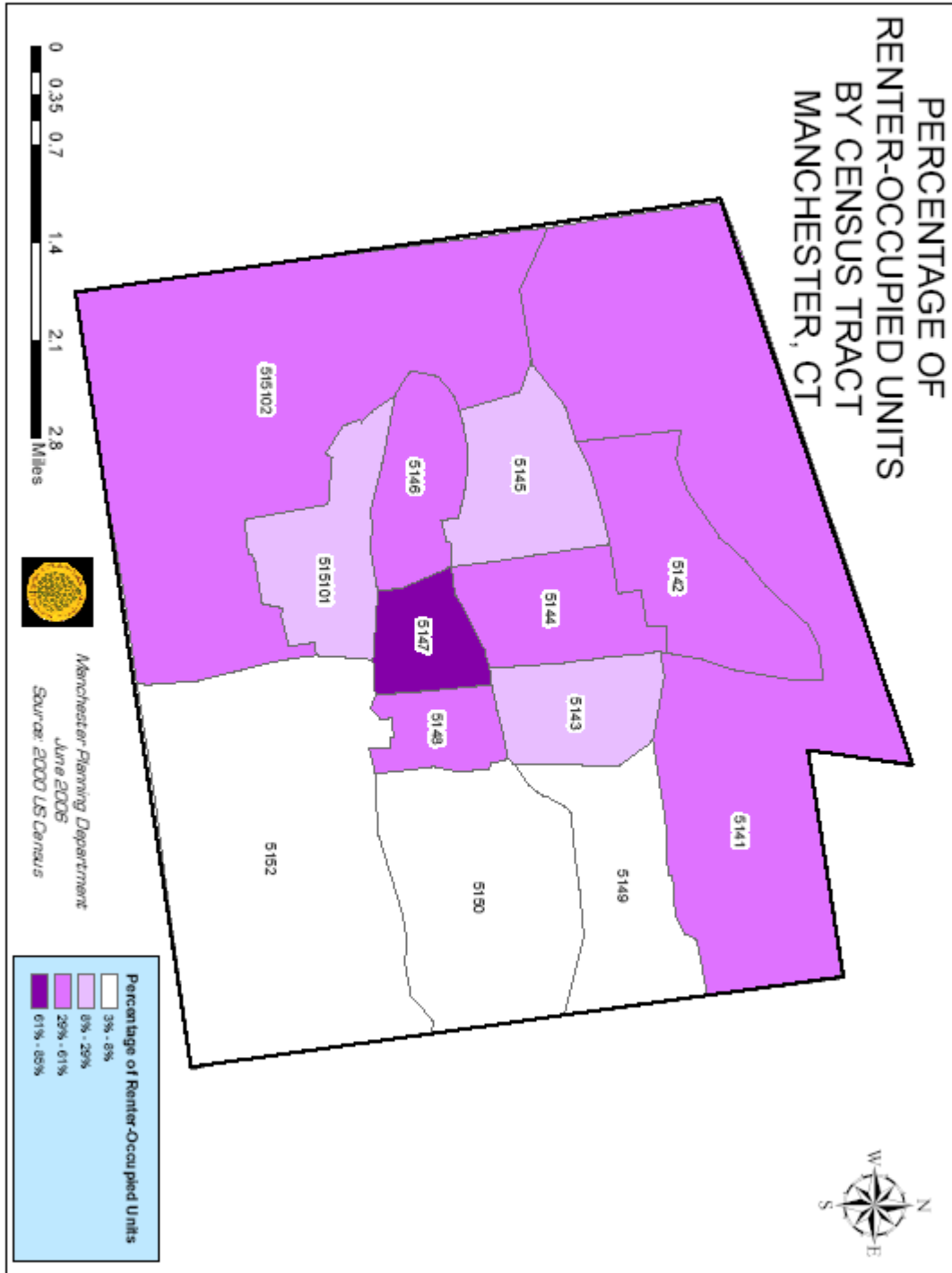
Map 7



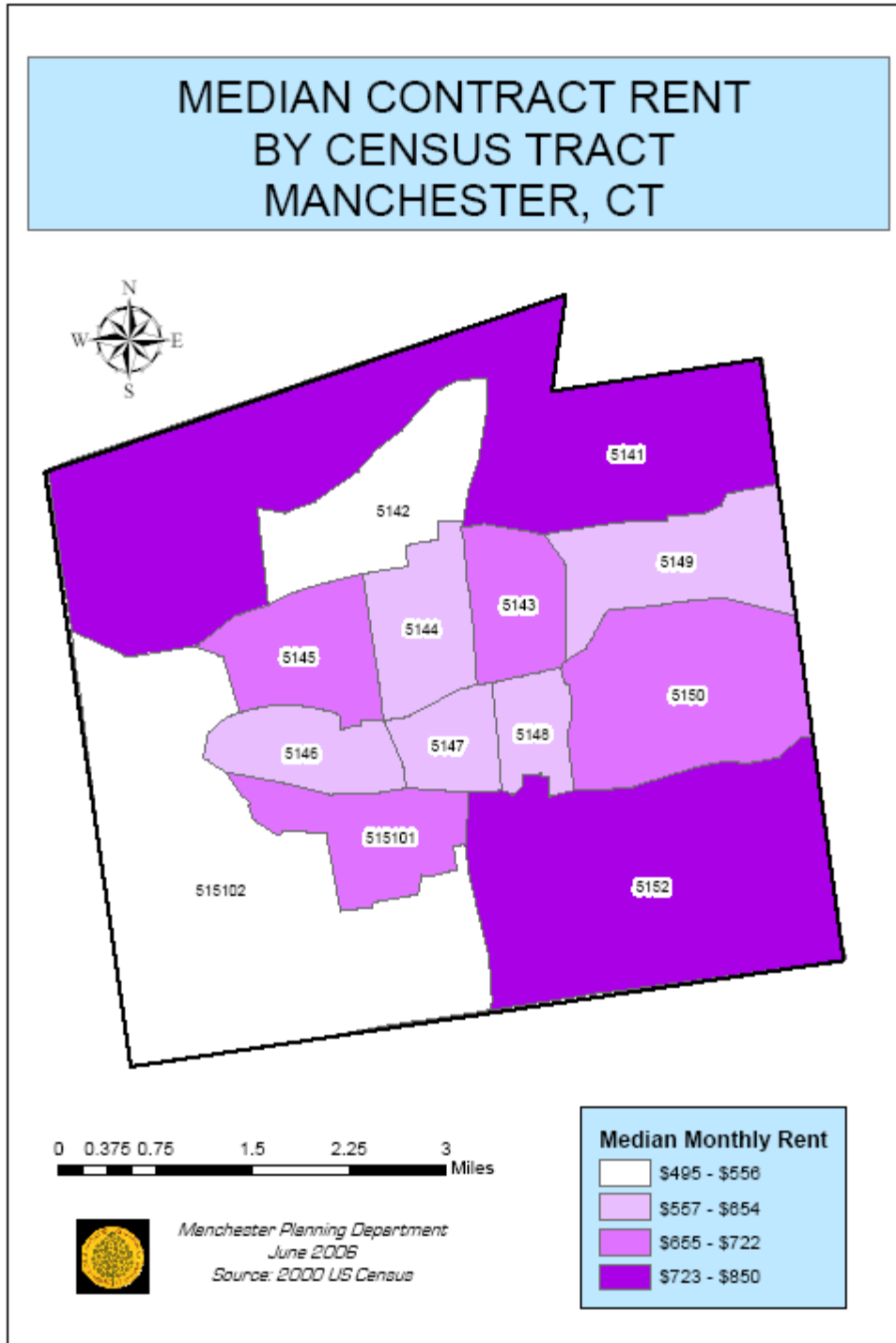
A greater concentration of rental housing exists in sections of town with lower median incomes. Whereas rental units constitute 61% of the housing units in tract 5147, three

census tracts have 6% rental units or less, limiting housing opportunities for renters in these areas.

Map 8



Map 9



Affordable Housing

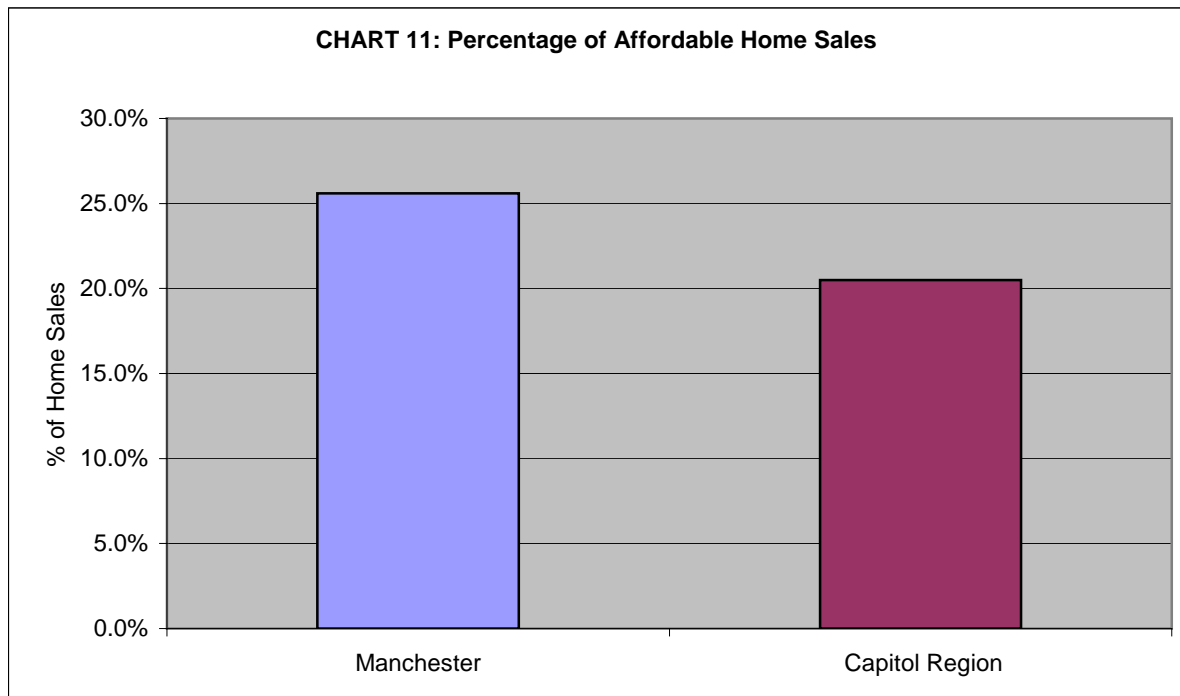
Over one quarter of the homes in Manchester were sold at affordable rates in 2005 (See Table N, Chart 11). In this case, affordable is defined as affordable to a household earning 80% or less of the Capitol region's median income of \$45,912. By this definition, an affordable house in Manchester in 2005 cost \$151,000 or less. Manchester's percentage of affordable units sold (25.6%) is greater than that in the Capitol region as a whole (21%). Of the 355 affordable sales in the town, 9% of them were affordable to low-income (50% of median) households. These homes cost \$94,500 or less.

TABLE N: PERCENTAGE OF HOMES SOLD AT AFFORDABLE* RATES- 2005					
	Total Sales	Low-Income Affordable Sales	Mod-Income Affordable Sales	Affordable % of Total Sales	% of Region's Affordable Sales
Manchester	1,014	95	260	25.6%	9.8%
Capitol Region	13,455	854	2,757	20.5%	100.0%

Source: CRCOG

* Affordable = Affordable to households earning 80% of the Connecticut household median income

** An affordable house at 80% of median income= \$151,000



Supportive Housing

Every April, Manchester participates in a point in time homeless count. The 117 surveys completed from April 3-10 represented 198 people, 81 of whom were children. Of those surveyed, 65% cited Manchester as their last town of residence. Nearly half of all respondents indicated they were living in an emergency shelter. Others were doubled-up with friends or family, lived in substandard or overcrowded housing, or were completely unsheltered. Over 30% of those interviewed identified the lack of affordable housing as the reason for their homelessness. Nearly 50% named drug abuse or mental illness as a reason for their homelessness. The 2006 survey also attempted to identify the primary needs of the Manchester homeless population. Of the 117 individuals surveyed, forty-nine percent identified substance abuse counseling, mental illness treatment or both as their primary need. Another 27.4% named housing and 5% listed supportive housing specifically as a primary need.

Simply defined, supportive housing combines affordable housing with on-site support and services. According to the Connecticut Partnership for Strong Communities, “Supportive housing is a proven, effective means of re-integrating families and individuals with mental illness, chemical dependency or chronic health challenges into the community by addressing their basic needs for housing and on-going support. Supportive housing is a solution to homelessness because it addresses its root causes. It is an alternative to more expensive and less effective institutional settings.”

The Manchester Continuum of Care Plan, completed in 2005, prioritizes the housing needs of priority populations. Of those needs, supportive housing was identified as a high priority for homeless individuals, those at risk of becoming homeless, individuals with mental health needs, and dually diagnosed individuals. Supportive housing was designated as a medium priority need for homeless/at risk families.

The Genesis Center runs the only supportive housing facility in Manchester which houses 14 men and women who pay 30% of their incomes in rent. Residents are able to access services such as case management, mental health and other services. The Manchester Housing Authority is currently pursuing an additional four units of supportive housing for disabled homeless individuals. This supply of supportive housing does not currently meet the needs of the homeless/at risk population in Manchester.

In light of the high demand for supportive housing and the high priority the town has placed on its development, there are relatively few supportive units in Manchester. Town zoning regulations do not currently define supportive housing and thus do not permit the establishment of supportive housing units in any zoning district.

VI. EVALUATION OF MANCHESTER'S CURRENT FAIR HOUSING PROFILE

A. Existing Programs, Services, and Activities That Assist in the Provision of Fair Housing

Housing Rehabilitation:

The Manchester Planning Department currently operates a Housing Rehabilitation program that provides financial assistance to owner-occupied or investor-owned single and multi-unit residential properties within the town's targeted housing rehabilitation area. Program funds assist low and moderate income homeowners in reducing lead-based hazards and in correcting property maintenance code violations or deficiencies. The program received approximately \$335,000 in allocated funds for the program in FY '05-'06, and approximately \$300,000 in funds are proposed for FY '06-'07. The goals of the program are:

- To preserve, improve, revitalize and stabilize Manchester's older neighborhoods, where housing and other community needs are greatest and broadest, so that they will continue to be livable and attractive neighborhoods.
- To minimize the health risks associated with lead-based paint by rehabilitating existing qualified housing located in targeted neighborhoods.
- To enhance and support community revitalization to the greatest extent feasible by integrating housing rehabilitation with other current or proposed town investments or other public improvements in targeted neighborhoods.
- To increase the accessibility of housing units to persons with disabilities by removing architectural barriers through such work as the installation of wheelchair ramps, special plumbing fixtures, hand rails and grab bars, and widening doorways.
- To preserve certain exterior and architecturally appropriate characteristics of older homes in targeted neighborhoods.
- To encourage and assist property owners in meeting safety, health and other code requirements.
- To assist with emergency repairs to income-eligible owners to eliminate conditions which are an imminent threat to health and safety and which would render the dwelling uninhabitable if it is not corrected.

During FY '04-'05, the Housing Rehabilitation program assisted property owners in rehabilitating 18 properties containing 28 units. Program goals for the upcoming ('06-'07) fiscal year include a minimum of 20 rehabilitated units.

Manchester Human Services

Manchester's Human Services (HS) Department is made up of three divisions: The Health Department, Senior, Adult and Family Services, and Youth Services. Senior, Adult and Family Services oversees the Manchester Senior Center. According to department staff, affordable housing is the greatest need facing Manchester residents who contact Senior, Adult and Family services. The department keeps an updated list of all apartments in town which it provides to residents seeking housing. While the HS staff works to help those in need of housing find resources, the staff reports that there are not enough housing resources to meet the current demand of those seeking affordable housing. Housing resources include information on available rental properties and referrals to other agencies. The HS Department also aims to address fair housing issues through other means such as utility and food assistance, which are aimed at keeping enough income in residents' pockets so that they are able to stay in their current housing.

Human Services also partners with the Housing Education Resource Center, the Manchester Housing Authority and The Manchester Area Conference of Churches (MACC). Through these partnerships, HS often refers residents to these advocacy organizations.

- MACC was established in 1973 and now functions as the town's primary non-governmental social service agency. MACC provides numerous programs for Manchester residents in need of housing and other services. MACC operates a shelter for Manchester's homeless population, as well as a soup kitchen and food pantry. The organization sometimes provides limited security deposit assistance for those who demonstrate need, counsels clients on how to be good tenants and provides assistance for utility and transportation costs aimed at keeping those at risk of homelessness in their current housing.
- The Housing Education Resource Center responds to requests for assistance with a wide range of housing issues. These issues include: fair housing and discrimination, evictions, housing searches, security deposits, leases and rental agreements, housing maintenance, code enforcement, rent subsidies, first-time home purchase, rent increases and others. The Center develops and distributes informational and educational material on these topics, hosts a counseling hotline for tenants and landlords and sponsors various workshops on housing issues.

Manchester Housing Authority

In July of 2006, the Manchester Housing Authority (MHA) was managing 413 units of subsidized housing, including 42 units of family housing and several hundred units for elderly and disabled tenants. The waiting list for units is currently at 400 and approximately half of those on the list are Manchester residents. MHA is considering closing the waiting list because of its length. On average, it takes about 4 years on the

waiting list to obtain a first floor, one-bedroom MHA apartment. Waits for efficiency units are generally 1.5 to 2 years and longer than 4 years for a 2 bedroom unit.

The MHA also manages HUD's Section 8 Housing Choice Voucher Program in Manchester. MHA currently manages 430 of its own vouchers and 400 from surrounding towns for more than 800 total. Tenants using vouchers pay 30% of their adjusted gross income for rent and utilities, with the remainder being paid by Section 8 up to the Fair Market Rent (FMR) standard. The FMR was \$801 per month for a one bedroom apartment and \$979 per month for a two bedroom apartment in 2006. The Housing Authority keeps a waiting list for this program as well, which is now closed. Cuts in HUD funding have essentially made new Section 8 vouchers unavailable to those seeking them in Manchester.

In addition to public housing, MHA has purchased and maintains some market rate housing, which it rents to residents eligible for Section 8. The MHA is also attempting to secure funding to develop 40-45 units for low-income elderly residents. This, the organization stated, is also barely feasible. In general, funding cuts have negatively affected MHA's ability to provide housing for Manchester's low-income residents.

Tri-County Board of Realtors

The Tri-County Board of Realtors, which encompasses realtors in Manchester, is a member of the National Board of Realtors. In 2004, the NBR and the US Department of Housing and Urban Development adopted a Fair Housing Partnership Resolution to "promote fair housing in all communities across our nation." The following REALTOR® Fair Housing Declaration was part of the partnership resolution to:

Provide equal professional service without regard to the race, color, religion, sex, handicap, familial status, or national origin of any prospective client, customer, or of the residents of any community.

Keep informed about fair housing law and practices, improving my clients' and customers' opportunities and my business.

Develop advertising that indicates that everyone is welcome and no one is excluded; expanding my client's and customer's opportunities to see, buy, or lease property.

Inform my clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.

Document my efforts to provide professional service, which will assist me in becoming a more responsive and successful REALTOR®.

Refuse to tolerate non-compliance.

Learn about those who are different from me, and celebrate those differences.

Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.

Develop and implement fair housing practices for my firm to carry out the spirit of this declaration

Continuum of Care Working Group

The Continuum of Care Working Group consists of representatives from various town departments, local nonprofits and agencies which deal with special needs populations. These populations include the elderly, people with mental or physical disabilities, those who have AIDS or are HIV positive, the homeless and those at risk of homelessness, and victims of domestic violence. This group focuses on the housing and service needs of special populations and is especially involved in homelessness prevention and advocacy for the need for affordable and supportive housing development. The working group indicates the following four specific objectives:

1. Provide a coordinated and comprehensive network of services to meet the needs of special populations, and assist with smooth transitions to more appropriate environments and services as the client's needs change.
2. Provide services which promote the least restrictive, appropriately supported housing environment for the client while maximizing their level of functioning and self-sufficiency.
3. Provide proper and necessary types of housing that are safe, dignified, and enrich the occupants and the community.
4. Provide many entry points into the system.

The 2005 Continuum of Care Plan singles out supportive and permanent affordable housing as Manchester's current highest priority housing needs.

B. Public Policies as They Relate to Fair Housing Choice

The Manchester Planning Department has assessed the extent to which local housing costs and the incentives to develop, maintain and improve affordable housing are affected by public policies at the state and local level. The potential impact of these policies on the achievement of fair housing choice was assessed as well.

Zoning Regulations

Rooming Houses: Rooming houses are currently a prohibited use in the Manchester Zoning Regulations. Although there appears to be demand for the low-cost housing which rooming houses provide, they are currently not a permitted use in any zoning district.

Renting of Rooms: Renting of up to three rooms of a private residence is currently allowed by Manchester Zoning Regulations. According to the Manchester Zoning Enforcement Officer, several instances of property owners surpassing this limit have recently been discovered, illustrating the continuing need for low cost rental options in town.

Group Homes: At the time of this analysis, Manchester's zoning regulations permit the development of group homes in the following zones: Rural Residence, Residence AA, and Planned Residence Development Zones. Additionally community residences of six or fewer mentally retarded citizens or six or fewer children with mental or physical disabilities are exempt from Manchester zoning regulations by state statute. Such residences are exempt from Manchester's zoning regulations.

Lot Size: Manchester's zoning regulations permit a variety of lot sizes, allowing developers to build housing in a range of sizes, and allowing for more affordable housing. Minimum lot size requirements for detached single family homes range from 7,200 square feet in the Residence C zone, to 30,000 square feet in the Rural Residence zones. Minimum lot sizes for two-family homes range from 7,200 square feet in Residence C zones to 9,000 square feet in residence B zones. Most undeveloped residential land in Manchester, however, requires larger minimum lot size, in essence limiting the affordability of current and future residential development.

Zone Location: Zones restricting residential development to single family houses and requiring larger minimum lot sizes dominate the southern and eastern portions of Manchester. These zones prohibit most structures compatible with affordable housing development. Not surprisingly, relatively few affordable units are available in these sections of town (See Map 7). These restrictions also limit the number of rental units available in these neighborhoods (See Map 8).

PRD Zones: Planned Residence Development zones allow new multi-family developments. The PRD zone is a floating zone and must be approved after a public hearing before the Planning and Zoning Commission. The purpose of the PRD zone is to "allow a mixture of various types of housing including single family, duplex and multi-family dwellings as well as certain accessory uses and special exemption uses." Development of the planned site is to be made to encourage the most appropriate use of the site, preserve significant natural features of the site (including trees, steep slopes, wetlands), and to provide for housing of moderate cost (Art. II Sec. 7).

EHD Zone: The Elderly Housing Development (EHD) Zone is a floating zone which is intended to permit a wide range of housing types for the elderly. Housing types permitted in EHD zones include elderly deed restricted residences, congregate housing, assisted living facilities, continuing care retirement facilities and nursing facilities. In June of 2006 the Manchester Planning and Zoning Commission (PZC) amended Article II Section 20.04.01 of the town zoning regulations to allow for the development of multi-family elderly housing at greater density than previously allowed. The revised regulation allows for 15 units of housing per acre as opposed to 10 units per acre allowed previously. The PZC also lowered parking requirements for such developments from two spaces per unit to one, excluding staff and visitor parking. These amendments were designed specifically to allow for more elderly housing units in a given development without the need for more land.

Historic Zone: Historic Zone regulations allow for the redevelopment of former mill buildings into multi-family housing units. Industrial and Business II zones also allow the conversion of historic mill buildings to multi-family residences. Regulations stipulate that 10% of the units be set aside as affordable.

Comprehensive Urban Development Zone: The CUD allows both low and high rise multi-family development.

Central Business District: CBD zone allows high-rise residential development.

Permitting Process

Manchester's policy of a streamlined permitting process allows developers to keep costs down and encourages development of all kinds in the town. Residential developments are no exception. Whereas the more units of housing are built, the greater their supply and lower their cost, Manchester's permitting process then, can be seen as an encouragement to affordable housing production.

Subdivision Regulations and Development Standards

The town's subdivision regulations proscribe the design standards for public improvements for the division of land and its development. These regulations also refer to the town's public improvement standards when dealing with the construction of public utilities and other facilities in support of land development. The subdivision review process itself is timely. The town prides itself on expediting the application review process and the Planning and Zoning Commission has a record of viewing all subdivision development applications objectively and weighing them against the requirements of the regulations. The regulations currently allow for sidewalks to be installed on only one side of the street. However, the regulations do require granite curbing and positive drainage systems on the properties. The PZC examines this cost

issue periodically and is not convinced that the standards contribute significantly to the affordability problem.

Building Codes

The State of Connecticut adopts the Boca Basic Building Code by statute. This forms the basis for the Connecticut Building Code, and the state is currently using the 2005 BOCA Code with the 2005 supplement including building, mechanical, and plumbing codes. The BOCA code also references the 2005 National Electrical Code (NFPA-70). The state uses the CABO/ANSI code standards for providing units which are accessible to the disabled. This forms the basis for the code, which is amended by the Connecticut Building Code. The Connecticut code incorporates ADA accessibility requirements that newly constructed structures must be fully accessible. Rehabilitated units which are undergoing a change in use must also be accessible to the disabled.

Connecticut's requirements for disability accessibility are more stringent than national codes generally, but most of these more stringent requirements are state statutory requirements. The code applies to new construction and additions, and in some cases to alterations to buildings or remodeling if a certain threshold of the cost of improvements is passed.

The Manchester Building Department ensures through its permitting procedure that the required number of fully accessible units for the disabled are designed and constructed. Since the town is operating under state adopted codes, our standards are no different than others being applied in Connecticut. There are waiver and variance procedures to the code process, but to our knowledge the codes themselves do not pose any unnecessary hardships regarding the provision of accessible units or the ability to retrofit buildings to meet accessibility standards.

In 2001, the Town implemented a neighborhood inspection program which is operated out of the Building Department. The program was designed to improve the physical integrity of Manchester's neighborhoods and maintain the stability of Manchester's existing housing stock.

Tax Structure

The Town of Manchester relies on the property tax for approximately 75% of its total revenue. Property taxes include the real estate property tax, the personal property tax and the motor vehicle tax. Because of the strong residential housing market over the past few years, the town anticipates that the 2006 revaluation will shift the tax burden towards owners of residential property. This will have a negative effect on the ability of both home owners and renters to afford living in Manchester. Additionally, in an effort to pay these anticipated taxes, owners will likely not be able to afford improvements to their properties, which could further allow the housing stock in older neighborhoods to

further deteriorate. Those owners who own rental properties will be forced to raise rents, making rental units less affordable for tenants, especially those of low incomes.

Manchester and the State of Connecticut do offer several forms of property tax relief for veterans, seniors and the disabled. State law provides for a \$3,000 assessment exemption for taxpayers who are legally blind and a \$1,000 exemption for those who are totally disabled and receiving retirement benefits. Some disabled homeowners who are totally disabled also qualify for tax credits under the State Homeowners Program.

Town ordinances provide complete property tax abatement for eligible low income homeowners age 65 and older. Additionally, some senior or disabled low income renters are eligible for partial rebates on rent and utility bills through Manchester Senior, Adult and Family Services. Property tax credits from \$150 to \$1,250 are eligible for low income seniors and disabled homeowners on their primary residence.

The town provides veterans or surviving spouses with \$4,500 in assessment exemptions and a further exemption for veterans of low incomes. Some active duty residents may also be eligible for such programs.

The Town of Manchester's policies do not exclude or discourage the development of affordable housing within its boundaries. The lack of market incentives for such development as well as the scarcity of Federal and State developer subsidies for this type of development are not policies within the purview of the town to affect change within the town.

Reductions In Funding for Housing

Recent cuts in funding levels have had a negative effect on Manchester's ability to continue existing housing policies and programs. Our largest source of funding for housing assistance are the funds from the Community Development Block Grant Program. Since 2001, our entitlement grant amount has been reduced anywhere between 5% and 10% annually. As mentioned elsewhere, reductions or less than adequate increases in Section 8 housing voucher authorizations, combined with reduced fair market rents are restricting the number of households who can receive this type of rental assistance. Funding reductions or freezes at the state level show similar trends. All of this limits Manchester's ability to assist low income households to secure housing, or to add to the supply of affordable housing in a community.

C. Nature and Extent of Fair Housing Complaints, Violations, or Suits

The following information regarding fair housing complaints, barriers, violations, suits and discrimination was gathered during the course of the analysis.

- The Manchester Outreach Project believes that lack of living wage jobs, high rents and high security deposit requirements are consistent barriers to housing opportunities in town. Many low-income residents are unable to pay the one or

two month security deposit required for a rental apartment. Additionally, the organization reported that many clients have criminal records which make it difficult to secure housing. According to the Project, landlords are now able to inexpensively obtain criminal records from online websites and often use that information to discriminate against prospective tenants.

- The Connecticut Fair Housing Center (CFHC) keeps a database of all housing discrimination complaints filed in the state. In the past 10 years, 88 of 4,035, or 2% of complains involved Manchester. In 2005, seven of 184 complaints (3.7%) came from Manchester. Of these seven, the most frequent claim was disability discrimination in which landlords refused to make reasonable accommodations for people with disabilities. The second most frequent complaint involved discrimination by source of income which is illegal under Connecticut fair housing law. The third most frequent complaint alleged discrimination based on familial status. The Center noted that, while Manchester's population makes up approximately 1.6% of Connecticut's population, 2-3% of yearly complaints, and 3.8% of 2005 complaints came from the town. CFHC staff also believe that, because of the disproportionate distribution of racial minorities in some areas, the possibility of unreported racial discrimination and/or steering by the real estate community exists. Such discrimination is rarely reported because of the difficulty in identifying individual cases.
- The Manchester Area Conference of Churches reported their observation that the biggest obstacle to fair housing in Manchester is the lack of living wage jobs, coupled with a shortage of affordable units. The organization works with the homeless community to assist in finding jobs and housing. Often, the jobs MACC clients secure do not pay enough for job holders to afford an apartment, or even a rooming unit. Additionally, security deposit costs are seen as prohibitive to securing adequate housing. MACC reports having good relationships with most landlords in town, and does not believe that landlord discrimination is a large problem.
- The Housing Education Resource Center stated that housing discrimination in Manchester tends to follow regional trends. HERC had no direct discrimination complaints in 2005-2006 and believes that this was due to the difficulty in identifying such cases and the time and effort involved in filing an official claim. Of those who did contact HERC about housing issues, the largest group was requesting information on tenants' rights and responsibilities. Although none of these constituted a direct complaint, the HERC stresses that they sometimes lead to one. Evictions was the second most common issue concerning those who contacted the organization, and security deposit issues was the third. Manchester residents also contacted HERC regarding lease/rental agreement questions and questions regarding subsidized housing and vouchers. HERC also stressed their belief that predatory lending by the lending community is an increasingly present and troubling issue.

- The Manchester Town Attorney's office reports a recent increase in the number of complaints regarding significant increases in rent. The office has received three complaints over the past six months in contrast to the one per year had been receiving in the three years prior. One of these was an official complaint and two were unofficial, in which residents contacted, and received advisement from the Town Attorney. The most significant increase in rent reported to the Attorney's office was \$600 per month. If the town attorney's office, the tenant and landlord are unable to resolve the increases, such cases go before the Manchester Fair Housing Commission. In the one official complaint the office has received, the Commission ruled in favor of the plaintiff. The landlord was granted the option of a rehearing, but has thus far not requested one.

Appendix I

SUMMARY MEETING MINUTES ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE IN MANCHESTER, CT WORK GROUP

JULY 13, 2006

HEARING ROOM, LINCOLN CENTER

Guests in Attendance: Karen Carlson, Anne Miller Real Estate; Bob Albert, Human Relations Commission; Mary Roche Cronin, Director of Human Services; Rudy Kissman, Planning and Zoning Commission; Donna Huff, Anne Miller Real Estate

Staff in Attendance: Mark Pellegrini, Director of Neighborhood Services and Economic Development; Gary Anderson, Senior Planner

Mr. Pellegrini convened the meeting after introductions and explained that the purpose of the meeting was to continue the Town's ongoing Analysis of Impediments to Fair Housing (AI). Every community receiving federal community development block grant funds must complete the AI and develop an action plan to address barriers to fair housing. Mr. Pellegrini said that the purpose of this group was to gain community input as to what the biggest housing issues and needs are in Manchester.

Mr. Pellegrini explained that the Fair Housing Act prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, disability, and familial status. Fair housing policy ensures that such discrimination is prohibited and that all residents have access to housing which they can afford. Notably, discrimination on the basis of source of income was not prohibited under federal law.

Mr. Pellegrini introduced Mr. Anderson who had prepared visual data relating to fair housing in Manchester. He slides displaying the following data, while highlighting important details:

- population change
- population by age
- population by race
- income by race
- poverty status by race
- owner vs. renter occupied housing
- housing type
- home sales price
- affordable home sales
- housing age
- housing value

- contract rent
- minority group concentrations
- income by census tract

During the presentation, the following comments and observations were made by the group.

- Both the elderly and school-aged populations are increasing in town, while the “house-buying population” has been decreasing. This appears to follow a regional trend of young professionals choosing to leave the region. This was seen as a cause for concern, whereas the income generating population is in decline in comparison to older and younger populations.
- The flat condominium market between FY 02-03 and FY 04-05 was seen as a surprise. The real estate representatives in attendance guessed that condo prices have increased significantly in the past fiscal year. In general, housing prices across the board have been significant in the past 10 years.
- The contract rent numbers were dated and thus, did not adequately reflect the current rental market. Mr. Anderson said the Planning Department was currently completing its rental survey which would provide a better picture as to what current contract rents are in town.

Mr. Pellegrini then asked the group to discuss what town-wide impediments to fair housing the group could identify.

A belief was expressed that current lending policies make it easier to buy a home than to rent one. The fear with such a phenomenon is that, with upcoming reevaluation and rising interest rates, increased foreclosures are inevitable, especially for low and moderate income homeowners.

There is currently much more housing on the market than there was at this time a year ago both in town, and throughout the region. The market is becoming more of a buyers market and sellers are realizing that they need to reduce asking prices.

The topic of segregation by race was brought up. Some expressed the view that the town has always been split up along ethnic lines. Mr. Pellegrini asked if there was anything the town could do to lessen these patterns. The idea of to reinstate a town program which provided funds for first time homebuyers was suggested. Some in the group suggested that that would not affect racial segregation in that lower-income homebuyers would still only be able to afford homes in lower cost areas of town. Others suggested that such a program would provide more housing options for lower-income families and would thus make it easier for some minority families to own a home a part of town where housing is more expensive.

Mr. Pellegrini said that the Town ran such a program from 1998 to 2002, but funds for the program have since run out.

There is a perception that there is not enough affordable housing for seniors and, as the elderly population in town grows, this will become more of an issue. As property and other taxes rise, those living on fixed incomes are increasingly unable to stay in their homes. The group suggested that the Manchester Housing Authority does not currently supply enough affordable units to seniors and that more assisted living developments were needed.

Although the phenomenon of 55 and older age restricted communities has added to the housing options of many seniors, the group felt that these developments were less than affordable for much of that population.

It was suggested that requiring developers to build affordable units within 55+ developments could be a way to offset trends which limit housing options for seniors. Mr. Pellegrini said that such a policy could include a density bonus for developers to offset the lost revenue of such units, and said the town would look more carefully at such inclusionary zoning options.

Mr. Pellegrini asked the group if they felt like overt or institutional housing discrimination was occurring within the town. The question yielded the following responses:

- ❑ Discrimination is typically the result of the individual behaviors of a few property owners and not a widespread problem.
- ❑ It was difficult for people with mental disabilities to find adequate housing when legally, they are able to enter into a lease, but might have difficulty adhering to it.
- ❑ Some landlords discriminate against those who have been recently incarcerated.
- ❑ Some landlords discriminate against tenants who wish to use Section 8 housing vouchers. Others discriminate against people with children.

Representatives from the real estate community said that they typically attempt to educate landlords who discriminate against Section 8 holders and those with children. They believed that more could be done to educate these landlords. Mr. Pellegrini asked if the group felt a conference on fair housing laws and regulations for landlords would be helpful. The group agreed that it would be, especially in educating landlords who might be discriminating against Section 8 holders because of ignorance as to how the voucher process works. It was agreed that looking at planning such an event could be one way to address such fair housing impediments.

The group agreed to stay involved in the process of addressing the impediments identified at the meeting. Mr. Pellegrini said the town would look carefully at the suggestions the group identified and remain in contact with the work group.

Mr. Pellegrini adjourned the meeting at 8:30 PM.

**TOWN OF MANCHESTER
HOUSING COMMISSION MEETING MINUTES
THURSDAY, OCTOBER 5, 2006**

MEMBERS PRESENT: Julian Stoppelman, Joan O'Loughlin, Geoff King, Sue Hadge

ALSO PRESENT: David Wichman, Chair, Planning and Zoning Commission;
Thomas Deffenbaugh, Economic Development Commission;
Donna Huff and Ann Miller, Ann Miller Real Estate; and David
Blackwell

STAFF PRESENT: Gary Anderson, Shyama Jaipershad, Mark Pellegrini

Chairman Hadge opened the meeting and turned it over to the planning department staff. Mr. Pellegrini said the main purpose of the meeting was to review the findings and recommendations regarding the Analysis of Impediments to Fair Housing in Manchester (AI). The staff had distributed the executive summary of the findings of the analysis as well as a list of identified impediments to fair housing choice and suggested actions. The members present discussed each of the recommendations.

Regarding the impediment to providing affordable housing units for the elderly, those present generally agreed this was an important issue for the Town to address. They generally endorsed the recommendations proposed in the AI as presented.

The staff also discussed the issue of possible discrimination against potential tenants because of their family status, in particular children, and source of income. The recommended action to address this issue was to conduct a seminar with Manchester landlords, property owners and managers regarding fair housing law and landlord rights and responsibilities. Those attending suggested part of the concern among landlords may be a misunderstanding of how the Section 8 rental assistance program works, as well as the fact that many landlords may not have adequate leases or proper controls for selecting, screening, and managing tenants. It was suggested the proposed seminar be expanded beyond fair housing law to a discussion of Section 8 and a discussion of model leases to protect landlords and tenants from improper behavior.

The recommendations included suggestions for creating an inclusionary zoning regulation both for elderly housing and for owner and renter housing. The approach is being recommended as a way to encourage the creation of some affordable units in new developments. This is a way to create units through the private housing market as opposed to nonprofit development or direct subsidies to homebuyers or tenants. It was recognized this will be challenging since most of the land available for development is in outlying areas, although there are some limited opportunities for infill development in more established residential districts.

It was also agreed that we need to focus not only on producing new housing units through development, but also providing opportunities for low and moderate income residents to rent or acquire housing. There was support for working with nonprofit developers to provide financial assistance to assist with development of affordable units. There was also interest in working with agencies which may be able to provide loan or grant funds to home buyers. One opportunity continues to be purchasing two-family homes and using one half of the unit as rental income to off-set mortgage costs.

During the discussion it was noted that the price increases have been moderating recently and homes are on the market for a slightly longer time than compared to recent months. Whether market prices will fall significantly and therefore significantly increase the number of units affordable to low and moderate-income buyers, remains to be seen. Depending upon economic conditions, many recent homebuyers who have purchased properties using adjustable rate mortgages with very low down payments may find that, as interest rates rise or as the terms of their mortgage for larger payments come due, they may not be able to maintain the payments and foreclosures may increase.

Those present questioned whether it was necessary to define supportive housing as recommended in the AI. Staff responded that supportive housing can mean different things. For example, people living in a legal dwelling unit independently, except for occasional site visits by case workers, are to a degree in supportive housing because services are provided. Group homes are also a type of supportive housing. The current working definition involves independent housing units with services available on site. Those in attendance agreed that clearly defining supportive housing would be useful in allowing for such uses in the future.

It was suggested the Town might look for more innovative ways to assist home buyers. For instance, it was suggested the Town could reduce property taxes to individual homebuyers with qualifying incomes in qualifying neighborhoods. It was also noted that funding for housing programs at the state and federal levels has been holding steady or declining, making it more difficult to serve large numbers of people who need housing or to produce new housing. It was noted that there is approximately six-year waiting list for Section 8 housing vouchers alone.

At the end of the discussion, it was agreed the planning department would make some modifications to the recommended actions in the draft AI based on this conversation, and would complete the document and submit it to HUD within the next few weeks.

The Commission also expressed an interest in inviting other boards and commissions to their next meeting to view two videos: one dealing with supportive housing and the other with the affordable housing situation in Connecticut. Mr. Blackwell, who is working with a group of Manchester residents on a community-based effort to inform the community residents about the need for and benefit of supportive housing, offered to return to present that video and answer questions.

Appendix II

Agencies Contacted for Data

Capitol Region Council of Governments
Connecticut Fair Housing Center
Connecticut Civil Liberties Union
Housing Education Resource Center
Town of Manchester Adult and Family Services
Town of Manchester Building Department
Manchester Area Council of Churches
Town of Manchester Department of Human Services
Manchester Fair Rent Commission
Manchester Housing Authority
Manchester Outreach Project
Town of Manchester Town Attorney
Tri-County Board of Realtors
Manchester Assessor's Office