

Analysis of Impediments to Fair Housing Choice. 2006



City of New Bedford, Massachusetts

Office of Housing and Community Development
Patrick J. Sullivan, Director

Analysis of Impediments

Table of Contents

- A. Executive Summary
- B. Introduction
 - a. Purpose and Context
 - b. Methodology
 - c. Citizen Participation Process
 - d. Plan Format
- C. Jurisdictional Background
 - a. Demographics
 - b. Income
 - c. Employment
 - d. Housing Profile
 - e. Maps
- D. Current Fair Housing Legal Status
 - a. Fair Housing Law Context
 - b. Fair Housing Complaints/Compliance Reviews
 - c. Fair Housing Discrimination Suits Filed
 - d. Analysis of Trends and Patterns
 - e. Discussion of Other Fair Housing Concerns or Problems
 - f. Assessment of Public Housing Programs in New Bedford
- E. Impediments to Fair Housing Choice
 - a. Public Sector
 - b. Private Sector
 - c. Public and Private Sector
 - d. Remediation of Findings
- F. New Bedford Programs
 - a. Current Public and Private Fair Housing Programs
 - b. Assessment of Public Housing Programs
- G. Conclusions
- H. Certification
 - a. Consolidated Plan Certification
 - b. City Certification
- I. Appendix

A. Executive Summary

The City of New Bedford, Massachusetts is the fourth largest city in the Commonwealth of Massachusetts with a population of just under 100,000. Located on the Atlantic coast in the southeastern part of the state, it is a city with a rich industrial, social and cultural history largely derived from its advantageous access to the sea and those who have made this city their home.



As its demographics continue shift over time, the demand for safe, decent and affordable housing opportunities in New Bedford have proportionately increased, particularly among a growing low and moderate-income population rooted in an increasingly diverse minority population. The question therefore arises as to how New Bedford might continue to grow in a manner that accommodates the housing needs of these individuals and families and move toward elimination of those impediments that stifle and discriminate.

In order to better understand the nature and extent of such impediments, the City of New Bedford—as an entitlement community under the federal Community Development Block Grant program—is required to regularly conduct an analysis to identify impediments to fair housing choice through a comprehensive review of local regulations affecting the location, availability and accessibility of housing as well as public and private programs, policies and practices that affect housing choice. To this end, this updated Analysis of Impediments is therefore developed and in so doing, has relied on a variety of data sources in its creation:

- Demographic trending based on data from the U.S. Census 2000
- Federal Financial Institutions Examination Council [FFIEC] data and projections
- Zoning and land use policies
- Greater New Bedford Realtor Data
- Discrimination complaints filed through the City and the Massachusetts Commission Against Discrimination
- Home Mortgage Disclosure Act [HMDA] Data
- Results of Community and Residential Surveys on Fair Housing conducted by the City
- Interviews with housing providers in the City of New Bedford

This Analysis of Impediments is intended to serve as a review of existing data rather than act as an investigative tool into any alleged complaints.

Based on information and data that was available at the time of this report's development, this Analysis of Impediments concludes that although there have been instances of alleged or actual discrimination in terms of access and tenure to housing occurring in New Bedford over the past several years, there have been no overt patterns of discrimination identified within the City. However, patterns, policies and practices that have the effect of restricting housing choice to some degree on the basis of race, color, religion, sex, disability, familial status, national origin and source of income have been discussed in this report and include:

- High concentrations of race and poverty in certain neighborhoods
- Housing costs that outpace income growth creating an affordability gap for renters and first-time homebuyers
- Minorities were more than three times likely than whites to be denied a home purchase loan in the New Bedford Metropolitan Statistical Area
- Lack of City enforcement of accessibility standards for new construction
- Inadequate regional transit service to existing service and employment centers on a seven-day basis that may limit job opportunities

B. Introduction

The United States Congress passed Title VIII of the Civil Rights Act of 1968 making acts of housing discrimination based on race, sex, national origin or ethnicity illegal in an effort to end housing segregation. Congress then amended this landmark legislation in 1988 making acts of discrimination against families with children and people with mental or physical illness equally unlawful.



A. Purpose and Context

In accordance with Congressional passage of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, the U.S. Department of Housing and Urban Development [HUD] must implement its programs in a manner that “affirmatively furthers” fair housing.

For years, only general guidelines were provided to HUD grantees receiving funding through the Community Development Block Grant [CDBG] program to fulfill the objectives of this requirement. Eventually, HUD began requiring its CDBG grantees to undertake an analysis that reviewed impediments to fair housing choice in the public and private sector as well as clear reporting on the progress being experienced in eliminating such impediments. As a result of this 1989 requirement, CDBG grantees, like the City of New Bedford, have been required to undertake an Analysis of Impediments to Fair Housing Choice [AI] and report on progress made in meeting the actions to eliminate fair housing impediments within the Consolidated Annual Performance and Evaluation Report [CAPER].

By providing a signed certification to that effect within its Action Plan each year, the City of New Bedford annually reaffirms its commitment to these requirements. This commitment to “fair housing planning” is likewise reinforced in the City’s five year Consolidated Plan.2005-2009. In so doing New Bedford agrees to affirmatively further fair housing, meaning, it will conduct an analysis of impediments to fair housing choice within the City, take appropriate actions to overcome the effects of any impediments identified through that analysis and maintain records reflecting the analysis and subsequent actions taken in this regard. The City has largely undertaken this work—and will continue to do so—through its Office of Housing and Community Development.

In undertaking this analysis, demographics, economics, housing patterns and personal choice share important roles in developing an understanding of, and examining, fair housing choice within the City. These factors lend context to the broader analysis of both impediments to fair housing choice and barriers to affordable housing¹.

At the same time, Fair Housing Laws at the Federal and State level extend beyond demographics, economics and housing patterns, reaching out to counter discrimination within the housing delivery system that impedes a household's ability to make a personal housing choice that is within one's economic means. Such impediments include any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict the availability of housing choice and includes any actions, omissions or decisions that have this effect. These impediments discriminate and can include discriminatory rental, real estate and lending practices, NIMBY [Not In My BackYard] attitudes and exclusionary zoning regulations that limit housing choices for minorities, families with children and other protected classes.

This Analysis of Impediments to Fair Housing Choice will consider all of these key impediments while similarly exploring the kinds of tools and techniques that are available to affirmatively further fair housing in New Bedford.

B. Methodology

In order to develop a report that has relevance and the potential for practical application within New Bedford, the means through which this data is collected, experiences understood and strategies become articulated, is critical. Because the applicability of this report in the future is rooted in a comprehensive review of policies, practices and procedures that affect the location, availability and accessibility of housing and current residential patterns and conditions, this plan has been conscientiously developed to include the following:

- **Review of Existing Materials.** The first step in developing this report has been the complete review of all existing fair housing material within the City including relevant excerpts from the Consolidated Plan.2005-2009, the 2002 Analysis of Impediments and all data collected relative to discrimination, complaints and any regulatory barriers to fair housing.
- **Public Input.** In its continuing effort to value the voice of the community, the Office of Housing and Community Development has solicited public comment on fair housing issues through several public meetings. The Analysis of Impediments was also publicly discussed at two meetings of the City's Continuum

¹ Affordability is largely dependent on supply and demand as well as proximity to public transportation. The economics of the marketplace limits the availability of housing to those with limited incomes and may lead to the concentration of low-income minority groups in certain neighborhoods with more readily available affordable housing. Barriers to affordable housing are addressed in the City's Consolidated Plan.2005-2009.

of Care through its membership component, the Homeless Service Provider's Network. Details of this process are highlighted in the following section of this chapter, C. Citizen Participation Process.

- **Demographic Analysis.** The chapter titled, "Jurisdictional Background," is a compilation of data taken from the Consolidated Plan, statistical reports from the Southeastern Regional Planning and Economic Development District, Census 2000 data and a variety of other sources including the Bureau of Labor Statistics and the Department of Employment Training.
- **Interviews with City and Housing Authority Officials** The OHCD has met with other City officials to define goals relating to Fair Housing and requested five years worth of data from each relative department.
- **Survey** A fair housing survey was created and solicited to the community through neighborhood groups, community meetings and through the City's website. In an effort to involve more senior citizens and minorities, copies were also made available through senior centers and in multi-language formats, respectively.
- **Banking Institution Data** In the development of this AI, the City's Office of Housing and Community Development relied on information obtained as a result of the Home Mortgage Disclosure Act [HMDA] for New Bedford banking institutions in order to better understand and analyze their lending practices and the extent to which they assisted potential homeowners in the City.

C. Citizen Participation Process

The general public participated in the development of this Analysis of Impediments and was notified of opportunities to participate in such conversations in electronic and traditional formats including the posting of its draft on the City's website at www.ci.new-bedford.ma.us/ohcd.htm.

As noted in the previous section, surveys and public meetings highlighted the means through which residents' input was solicited for this report. Both the availability of the surveys and the notice of public meetings were advertised in the Standard Times newspaper and a language-appropriate press release was issued to Spanish and Portuguese newspapers. In addition, flyers were distributed within the community and emails were sent to the leaders of each neighborhood association.

In addition to residential input, developers, landlords, service providers and realtors were solicited for comments through a variety of venues.

D. Plan Format

This Analysis of Impediments, a review of impediments to fair housing choice in the public and private sector, includes:

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

As such the format of this plan includes a discussion on jurisdictional background, fair housing legal status, impediments, themselves and current City programs.

C. Background

Before assessing the nature and extent of impediments to fair housing in the City of New Bedford it is imperative that one first understands the jurisdictional background – particularly regarding demographics, income, employment and housing--as being relevant to any such discussion.



A. Demographics

Population Consistent with the theory that population growth and decline typically parallels a community's economic and social growth patterns, New Bedford's population peaked during periods of great prosperity during the whaling and textile eras and subsequently declined as industry shifted and a portion of the labor force relocated outside of the area.

New Bedford's overall population is in decline. While New Bedford's affordability remains attractive in light of the cost of living in surrounding communities, competing interests, a demand for larger residential lots and the phenomenon of the "suburban exodus" continues to affect New Bedford's overall population as it had in the latter half of the 20th century.

- Since 1970 New Bedford's population has slowly decreased from 100,973 persons to its 2000 level of 93,768.
- The U.S. Census reported the City of New Bedford's overall population as being 93,768, a decrease of 6% in just ten years from its 1990 level of 99,922.

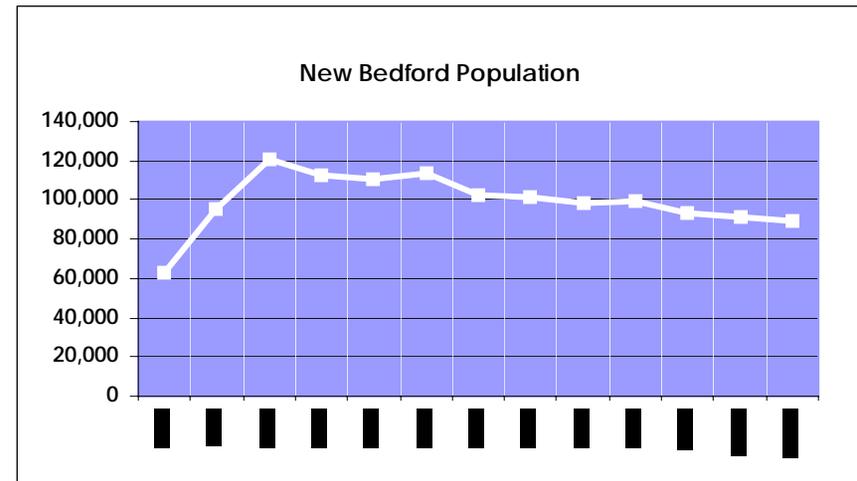


Figure C.1 New Bedford Population
Source for 1900 – 2000 Data: US Census; Source for 2010 and 2020 Data: MISER

- While New Bedford’s population declined, the 2000 U.S. Census reported that Bristol County’s population increased by 7.8% and the Commonwealth’s population increased by 11.6% overall during that same time period [1970 and 2000].
- According to the U.S. Census, Bristol County and the Commonwealth experienced population growth during the period between 1990 and 2000 at a rate of almost 1% and 6%, respectively.
- Projections generated by the University of Massachusetts’ research arm, “MISER,” suggest that this decline will continue through 2020.

**New Bedford’s Population Growth by Age
U.S. Census 1990 - 2000**

Age Group	1990	2000	% Change
0 – 17	24,953	23,327	-7%
18 – 34	27,141	22,351	-18%
35 – 64	30,453	32,442	7%
65 and over	17,375	15,648	-10%

Figure C.2: Population Growth by Age
Source: US Census

Despite a decreased overall population, the minority population in New Bedford continues to grow.

Roughly one out of every five persons living in the City of New Bedford is foreign born and almost 40% of its residents over the age of five speak a language other than English at home. Of the minority populations identified in the 2000 Census as compared with those in the 1990 Census, the Hispanic population represents the greatest actual increase while the Asian/Pacific Islander population represents the highest percentage increase over that ten-year period. Figure 3.3 further highlights these populations by comparing them between these two decades. [See maps entitled: “Percentage of minority population by census tract” and “Percentage of minority households by census tract”].

- Consistent with other cities nationwide, New Bedford saw a significant increase in Latino residents in the 1990s, a population which increased by over 44% during that decade. Latinos now account for 11% of the City’s ethnic population. [See map entitled “Percentage of Hispanics by Census Tract.”]
- During this same time period, the white population decreased by over 14,000 resulting in a 16% drop between 1990 and 2000 Census levels.

**Minority Population Comparison
U.S. Census 1990 - 2000**

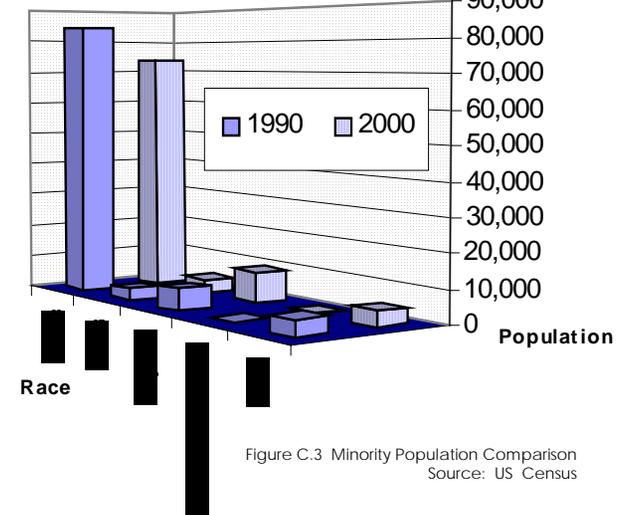


Figure C.3: Minority Population Comparison
Source: US Census

The ancestries of New Bedford’s residents represent a diverse mix of cultures particularly highlighted by the Portuguese population.

- Figure C-4 demonstrates that over a third of the City’s residents are of Portuguese descent while over 7,000 Cape Verdean residents compromise New Bedford’s second largest ethnic group.
- There is a significant French/French Canadian population in addition to English, Irish, Polish and Italian communities within the City.
- Approximately 18% of the City’s foreign-born residents entered the United States during the 1990s.
- According to the 2000 US Census, approximately 80% of the Commonwealth’s residents speak only English at home while in New Bedford that number is far smaller at 62%. Those who do not speak English very well in New Bedford represent roughly 17% of the City’s population, a number that is 10% higher than the remainder of Massachusetts.

Ancestry	2000
Portuguese	33,308
Cape Verdean	7,156
French (except Basque)	5,692
French Canadian	4,947
English	4,349
Irish	4,267
Polish	1,992
Italian	1,778

Figure C.4 Ancestry Chart
Source: US Census

B. Income

Households

The U.S. Census defines household as being either a family household [where persons living together are related by birth, marriage or adoption] or a non-family household [where single persons live either alone or share housing with other singles].

Both household size and the number of households in the City of New Bedford are declining.

- The total number of households in the City of New Bedford dropped by two percent between 1990 and 2000. The number of “family” households declined at an even faster rate declining 9% during that decade [See Figure C-5, New Bedford Households].
- Despite the decline in household numbers, the ratio of family households to all households [64%] remained comparable to the Commonwealth’s ratio [65%].

New Bedford Households

Age Group	1990	2000	% Change	Family Type	Number	Percent
Total Households	38,788	38,178	-2%	Families with Children	11,897	100%
Family Households	26,576	24,266	-9%	Married Couples	6,286	53%
%Family to Total Households	69%	64%	-	Single Mothers	4,701	40%

Figure C-5: Households in New Bedford
Source: US Census

- Figure C-6 depicts the decline of the average household size that fell from 2.58 persons per household in 1990 to a level of 2.46 in 2000. This drop occurred despite a large influx of Hispanic and Latino families with relatively large households. Such a trend suggests, to some extent, an aging population coupled with an increase in nontraditional families.

Average Household Size		
Age Group	1990	2000
All Households	2.58	2.46
White	-	2.34
African-American	-	2.50
Hispanic or Latino	-	3.15

Figure 3.6: Household Size
Source: US Census

New Bedford has a significantly high number of female head of households and an increasing number of non-traditional families.

There are large numbers of children being raised by single parents and nontraditional families within the City of New Bedford, not unlike most urban areas across the country today.

- Forty [40] percent (4,701) of families with children under 18 are headed by single-mothers in the City of New Bedford while only about 6.7 percent of families statewide are headed by single-women with children.
- While the U.S. Census reports that in 2000 54% of all children under 18 live within a two-parent household, thirty-eight [38] percent [8,190] of all children under 18 in the City of New Bedford live with only their mother. [See Figure C-7, Households/Work Status 2000].
- Approximately 68 percent of children living in these single-mother families have mothers who work out of the house.
- Nationwide there is a growing segment of the population described, as “nontraditional families” such as is the case with grandparents raising their grandchildren. New Bedford has a large number of families (776) in the City in which grandparents are the primary caregivers.

Children < 18 by Family Type/Work Status of Parents

Work Status	Number	% Overall	% of Subgroup
Total:	21681	100	
Living with two parents:			
Both parents working	7490	35	64
Only father works	2491	11	21
Only mother works	679	3	6
Neither parent works	1090	5	9
Living with one parent:			
Living with father:			
Father works	1364	6	100
Father not working	377	2	28
Living with mother:	8190	38	100
Mother works	5587	26	68
Mother not working	2603	12	32

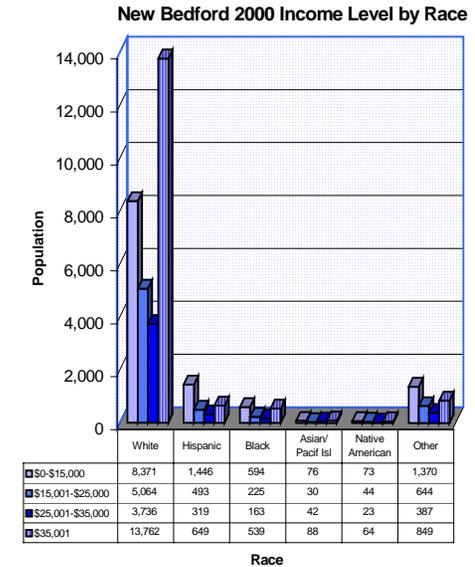
Figure C-7: Households/ Work Status 2000
Source: U.S. Census

Income

In addition to population counts and household data, the demographic information produced in the 2000 Census reveals important information about income and poverty levels in the City of New Bedford.

Although New Bedford’s overall population has declined, its low and moderate income population has increased. As noted at the outset of this chapter, the US Census reported that the overall population of New Bedford declined by 6% during the ten-year span between 1990 and 2000. During that same time frame, the City’s low and moderate-income population grew.

- The 2000 Census data reveals that roughly half of the total 41,511 households in New Bedford fall below the median household income [MHI] of \$27,569. In 1990 the MHI was \$22,647.
- Unlike the MHI, the 2000 Median Family Income [MFI] for New Bedford calculated by the Census Bureau [using slightly different criteria] results in a somewhat higher income threshold of \$35,708. Based on this median, 61% percent of New Bedford’s population have incomes at or below 80% of the MFI and are therefore considered low and moderate income.
- In 1990 the MFI for the City was \$28,373. In light of this, 54% of the population was considered low and moderate income.
- The low and moderate-income population in the City of New Bedford increased over one decade by seven percent while the total population decreased by six percent in that same period.



FigureC-9: New Bedford 2000 Income Level by Race
Source: US Census

Within the Low and Moderate Income [LMI] population, several segments in particular experienced increased incidents of poverty.

- Elderly, children, female head of household and minority families experience higher levels of poverty than the population as a whole which in turn leads to greater needs for community services and housing assistance among those populations.
- Categorized by race, 27% of all white households have incomes below 50% while 39% of all black households fall below the MFI level and almost 50% of all Hispanic households report income below the median. Figure C-9 highlights this breakdown by race.

New Bedford continues to struggle with poverty.

- The official poverty rate increased by three [3] percentage points in the 1990s rising from 17% in 1989 to 20% in 1999. That figure has remained steady through 2005. [See map entitled, “Percentage of Population living below the poverty line by census tract” .]

- New Bedford’s poverty rate increased during a period in which the United States, overall, experienced its lowest poverty levels in thirty years.

The “working poor” constitute a significant segment of the City’s population.

- While a fifth of residents are officially poor, a second fifth [20%] earn incomes that fall somewhere in the 100 to 200% of poverty range.
- These people work but earn very low incomes. Policymakers often term this type of resident as “working poor.”
- The working poor and their families rely on essential services [e.g. childcare, healthcare] provided by local public/private agencies.

There is a high level of children living in poverty in the City of New Bedford.

Working poor families and female head of households struggling with poverty have a direct impact upon children.

- While married couples with families averaged incomes around \$45,000, single female heads of households with children had an average income of only \$13,453. Based on 2000 Census data, almost 70% of these female householders with children under age 5 live below poverty level.
- The numbers of children living in poverty have increased in New Bedford during the 1990s by 5% [<5yrs old] and 2% [5-17 yr olds] as highlighted in Figure C-10: Children in Poverty.

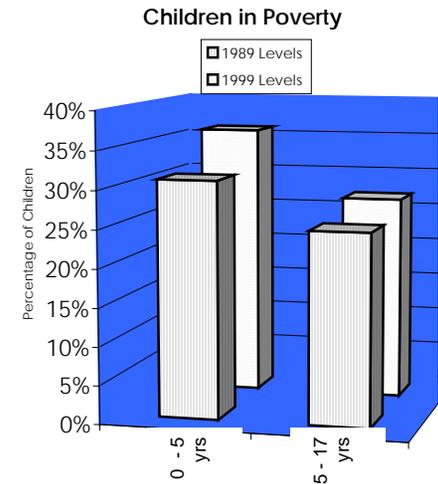


Figure C-10 Children in Poverty and Figure C-11 Poverty Study
Both Sources: US Census

Poverty rates are particularly high for the City’s minority residents.

While African Americans and Latinos still make up the largest number of residents living in poverty, statistics are showing that the two ethnicities are gaining ground in the struggle for economic equality.

- The white population saw a slight increase in poverty over the last two years while African Americans and Latino resident poverty rates declined slightly [See Figure C-11 Poverty Study]. Over a third of African-American and nearly half of all Latino residents were living below poverty in 1999.
- Income inequality between white and African-American and Latino residents declined slightly in the 1990s; however, African Americans living in New Bedford still earn less than 65% of whites and the per capita income of Latino residents is less than half the per capita income of white residents.

Per Capita Income by Race/Ethnicity, 1989 - 1999			
Race/Ethnicity	1989	1999	% Change
White	14,782	16,749	-6%
African-Amer	11,579	11,713	10%
Hispanic/Latino	6,539	7,610	16%
Percent Below Poverty by Race/Ethnicity			
White	14%	16%	2%
African-Amer	36%	34%	(2%)
Hispanic/Latino	52%	47%	(5%)

C. Employment

Quick Overview: New Bedford has a workforce of 42,000 people and a business establishment rate of 2,300. The City's location, 60 miles south of Boston and 30 miles east of Providence, places it in the midst of New England's skilled high-technology workforce.

Economic activity is concentrated in three distinct areas of the City: the Port of New Bedford, Downtown New Bedford and the New Bedford Business Park.

- The Port generates over \$700 million in sales annually and provides 3,700 local jobs.
- New Bedford's downtown central business district includes 3.6 million square feet of rentable office space spread over 52 city blocks—financial, insurance, legal and other business service companies occupy the majority of this space.
- The New Bedford Business Park is home to 36 manufacturing plants that provide nearly 4,000 jobs.

The largest New Bedford employers include the SouthCoast Hospital Group, the Acushnet Rubber Company and Aerovox Industries [Figure C-13 Ten Largest Employers]. Both the Port of New Bedford and the Business Park fall within the boundaries of Free Trade Zone 28. New Bedford also has an Enterprise Zone and a federal urban Empowerment Zone.

Major Trends: The 1980s and early 1990s were difficult times for New Bedford's economy. Manufacturers were compelled to shed large numbers of jobs in an effort to restructure their businesses in the wake of new free trade laws the increased exposure to global competition. These policy changes, couple with an extremely strong dollar, forced a number of manufacturers out of business. During this transition period New Bedford had higher unemployment rates than statewide averages. Eventually, the City's unemployment rate dropped throughout the 1990's from 12.5% to just 4.4% in 2000. New Bedford's unemployment subsequently rose to 10.4% in 2003 [or 7.7% not seasonally adjusted] and dropped only slightly to 7.3% [6.7% not seasonally adjusted] in 2005. Figure C-15 depicts trending in unemployment rates for New Bedford, the State and the nation.

Figures released from 2001 by the Massachusetts Division of Employment and Training reveal that despite a nationwide recession the City's labor force is growing and the number of businesses operating in New Bedford has grown.

Southcoast Hospital Group	2,000
Acushnet Rubber Co.	950
Aerovox Industries	624
Riverside Manuf.	508
Polaroid	500
Alleghany Technologies	339
Sacred Heart Nursing Home	300
Maeira-Twin Fashions	287
Olin-Asahi Interconnect Tech	280
Brittany Dyeing & Printing	280
Total Employees:	6,068

Figure C-13: Ten Largest Employers
Source: OHCD Data

Degree	1990	2000	%Change
High School	50%	58%	-6%
College	10%	11%	10%
Graduate	3%	3%	-12%

Figure 3.14: Educational Attainment New Bedford Labor Force
Source: US Census

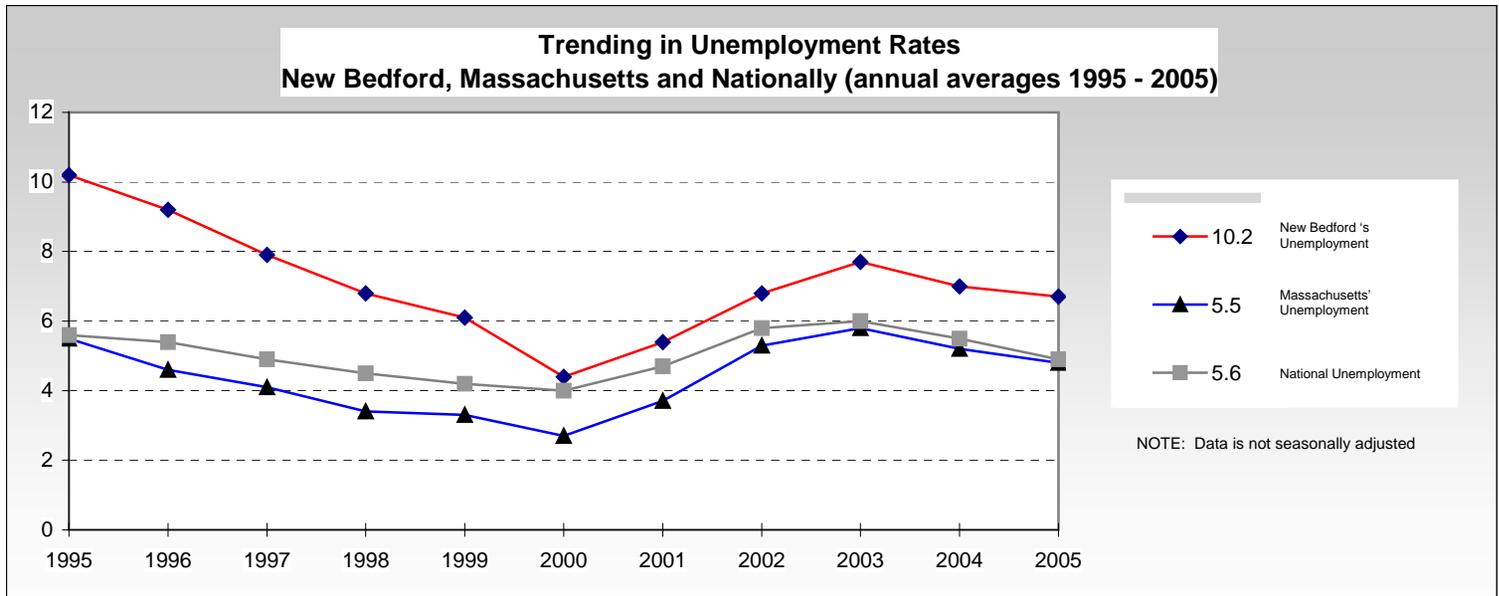


Figure 3-15 Trending in Unemployment Rates City-State-Nation
 Source: U.S. Bureau of Labor Statistics and the MA Division of Employment and Training

Labor Force: Approximately 85,000 workers live within the eight cities and towns that make up Greater New Bedford; about half of these workers live within the City. Local firms also attract workers from adjacent metro areas—Boston, Brockton and Providence. The labor force of this larger labor market area numbers 1.7 million.

During the 1990s, the percentage of residents with high school degrees increased substantially while the proportion with college degrees increased only slightly. The slow increase in residents with college degrees can be attributed, at least in part, to an outward flow of younger more educated residents; the City's population between the ages of 18 and 34 declined by 18 percent in the 1990s. For the most part, these younger residents move to nearby areas where the demand for skilled workers is greater. New Bedford's labor force is increasingly working outside the City of New Bedford. In 1990, the majority (65%) of residents worked within New Bedford; by 2000 half of the City's residents worked in another area. Census data show that most residents who work outside of New Bedford are commuting to areas beyond Greater New Bedford.

Place of Work	1990	2000
New Bedford	65%	50%
Greater New Bedford (not in city)	15%	19%
Outside Greater New Bedford	19%	31%

FigureC-16: Location of Employment 1990-2000
 Source: Bureau of Labor Statistics

Services versus Manufacturing Industries: During the later half of the 1980s and throughout the 1990s the New Bedford economy saw rapid growth in service-based industries. Between 1985 and 2001, services employment in the City grew by 30 percent. As a proportion of total employment, services related jobs increased from 16 percent in 1985 to 28 percent in 2001. In 2001 over 10,000 workers participated in the City's service industries. Several thousand workers were employed in the health and social service sectors. Depository institutions, law offices and engineering firms continue to be among the City's largest service-based employers.

Contrasting with the increase in the service industry, New Bedford lost manufacturers steadily throughout the 1980s and 1990s. The number of manufacturing jobs remaining in 2000 was just 40 percent of the number available in 1985. Still, manufacturers employ 8,400 workers in the City of New Bedford representing 25% of the local workforce.

Implications at the Census Tract Level: When considering a map of the unemployment rate by census tracts within New Bedford it becomes clear that those areas with higher concentrations of minority populations and higher poverty levels similarly experience higher unemployment rates. Targeted city neighborhoods including Acushnet Heights, South Central/South First and the Cove Street neighborhoods particularly represent concentrated areas with marginalized populations and corresponding significant physical disinvestments within the community. [See map entitled, "Unemployment Rate by Census Tract"].

D. Housing Profile

New Bedford's housing stock includes over 41,000 units. Single-family homes account for a third of the City's housing; over three-quarters of the stock are accommodated in structures that include fewer than 5 units. According to Census files, the majority of the City's housing was built prior to 1939. The number of households in New Bedford dropped by 2 percent between 1990 and 2000. Family households declined at an even faster rate; the City had nine percent fewer after the 2000 Census. The number of housing units in New Bedford fell by 0.6 percent in the 1990s. During this time rents and home values also fell sharply; the vacancy rate climbed over 8 percent. The slight movement in housing is due to the fact that the city is losing some of its population and a number of deteriorated units were demolished in the early 1990's.



Some lower income families may tend to move away to seek alternative housing yet some of Greater Boston's population is moving in this direction because of its comparatively low prices—something that at least in part, explains the increase in single families.

The composition of New Bedford's housing remains predominately multi-family. As Table 4-2 demonstrates, over 66% of New Bedford's housing stock is comprised of two or more units. With over 47% containing three or more units. This poses additional challenges to New Bedford residents seeking homeownership opportunities. Precious dollars are difficult to come by especially when 59% of renters are spending between 30% and 50 % of their salary on rent.

Housing Tenure Figure C-17 provides citywide data on the number of units by tenure (owner vs. renter) and vacancy rates. In 2000, New Bedford had 41,511 total housing units (a decrease from 41,684 in 1990), of which 38,178 were occupied (92.0%). Despite a slight shift in favor of ownership since 1980, New Bedford has a lower ownership rate (43.8%) than the nation (66.2%). The owner/renter split is again higher than state and national averages with over 56% of New Bedford households renting. New Bedford's vacancy rate is among rental units is higher than the state average. The overall vacancy rate in 2000 was 8 percent. (A healthy vacancy rate is closer to 4 percent).

Housing Costs and Affordability Figure C-18 contains 2000 Census sample data for specified owner-occupied Housing units in New Bedford. Roughly 50% of owner occupied units were valued between \$100,000 and \$149,000, and over 30% were valued between \$50,000 and \$99,999. The median value was \$113,500. Table 4.6 shows 2000 Census sample data on monthly costs for specified owners with mortgages. Of almost 5,000 owners, nearly 7,100 had a mortgage, a second mortgage, and/or a home equity loan.

More recent data indicates an exponential increase in home values over the past several years. Between 2000 and 2004, the median home value nearly doubled from \$113,500 in 2000 to \$241,058 in 2004.

Housing Unit Type	Number	Percent
Total Housing Units in Structure	41,511	100.0
1-Unit detached	12,519	30.2
1-Unit attached	1,213	2.9
2 Units	7,924	19.1
3 or 4 Units	11,820	28.5
5 to 9 Units	4,053	0.8
10 to 19 Units	1,205	2.9
20 or more Units	2,655	6.4
Mobile	114	0.3
Boat, RV, van, etc...	8	-
Housing Occupancy		
Total housing units	41,511	100%
Occupied housing units	38,178	92%
Vacant housing units	3,333	8%
For seasonal, recreational or occasional use	108	0.3%
Homeowner vacancy rate (percent)	1.9	N/A
Rental vacancy rate (percent)	6.9	N/A
Housing Tenure		
Occupied housing units	38,178	100.0 %
Owner - Occupied housing units	16,711	43.8 %
Renter - Occupied housing units	21,467	56.2 %
Avg household size of owner-occupied units	2.60	N/A
Average household size of renter-occupied units	2.25	N/A

Figure C-17 Housing Units, Occupancy & Tenure

Homeownership. Homeownership remains elusive for many New Bedford residents. The homeownership rate in 2000 was 44%, virtually remaining unchanged from the 1990 homeownership rate in the City. This contrasts with the Commonwealth's homeownership rate of 64% in 2003 and the national homeownership rate of 68% percent according to the U.S. Census.

Such data contributes to the understanding that there is a growing need for assistance to first time homebuyers. As ethnic minority groups have increased, so too has the number of young families. As a group, they are typically trying to become homeowners for the first time. In recent years, the city's ample stock of available housing, the majority of which was priced below fair market value, was an obvious attraction for these young families. However, very recent trends in the real estate market citywide demonstrate a relative scarcity in inventory and a marked increase in cost.

Value of Owner-Occupied Housing Units, 2000		
Value	Units	Percent
Less than \$50,000	356	2%
\$50,000 to \$99,999	5,270	32%
\$100,000 to \$149,999	8,726	52%
\$150,000 to \$199,999	1,902	11%
\$200,000 to \$249,999	265	2%
\$250,000 to \$299,999	144	1%
\$300,000 or more	61	0%

Figure C-18 Value of Housing Units

There has been a steady increase in the average purchase price of homes in New Bedford. This trend, however, does not apply to all areas of the city. Affordable housing opportunities remain abundant in the city's more economically depressed neighborhoods, where the housing stock is largely multi-family, and where there is a larger inventory of distressed properties. In these neighborhoods, the City's designated Revitalization Target Areas, funding for housing rehabilitation will continue to be an integral piece of the City's first time homebuyer assistance. Increasing the number of homeowners is an important tool in revitalizing these distressed neighborhoods, as owner-occupants are more likely to maintain their properties and become involved in their neighborhoods given the investments they have made. However, HUD's new lead paint regulations, scheduled to go into effect in September, 2000, will likely decrease the number of first time homebuyers receiving rehabilitation assistance.

A primary factor in assuming ownership of a home for the first time is its affordability. Between 1990 and 1994, the average price of a home on the market increased only slightly. Between 1997 and 1999, trend data shows the increases to be more dramatic.

According to the Southeastern Massachusetts Multiple Listing Service, the average price of a single-family home in the City of New Bedford increased by 14% between 1997 and 1999. This is not as dramatic as the 20% increase between 1987 and 1990, but it indicates a significant shift in the market. In 1970, the median value of homes in New Bedford was \$16,800, compared to \$20,600 for the state of Massachusetts. In 1980, the median value of homes in

New Bedford was \$32,600, compared to \$48,500 for the state. The almost 100% increases in housing prices in New Bedford during the aforementioned period paralleled the state housing price increases for the same time period. In 1990, however, the increases were more marked. The median value of a single-family home in the New Bedford statistical area, according to the 1990 Census, was \$115,900, compared to \$162,800 for the state. In 2004, the average home price in New Bedford escalated to \$224,000.

Another factor in assuming ownership of a home is the home purchase affordability gap. The affordability gap is defined as the difference between the average single-family sale price and the affordable price. This gap narrowed somewhat during 1992 and 1993, which represented a reversal of the affordability gap in the late 1980s. After rapid price increases during the 1970s, housing affordability improved slowly between 1981 and 1987. However, affordability deteriorated rapidly again between 1988-1990 as average house prices increased by over 20% annually. The improvement in affordability in the mid-to-late 1990's was due to the drop in interest rates and slight increases in median family income levels. However, with interest rates currently on the rise, and with recent increases in home prices, one could reasonably expect affordability to decline.

HOME OWNERSHIP AFFORDABILITY ANALYSIS

- New Bedford Median Family Income (MFI) 2004 - \$55,000.
- 61% of the City is considered low and moderate income (defined as households having incomes at or below 80% of MFI).
- A three-person household at 80% of MFI would earn an income of approximately \$44,400.

Home Sales Analysis

- Single Family Home Sales for the period 2/15/04 – 4/22/04 have averaged selling price of \$224,114.
- Single Family Home Pending Sales for the period 2/15/04 – 4/22/04 are averaging \$267,896.
- Multi- Family Home Sales for the period 2/15/04 – 4/22/04 have averaged selling price of \$228,948.
- Multi- Family Home Pending Sales for the period 2/15/04 – 4/22/04 have averaged selling price of \$261,948.

Figure C-19 Home Ownership Analysis
Source: Greater New Bedford Multiple Listing Service

Example: Single Family Home Ownership Affordability Analysis

Based on a \$212,750 Loan:

\$224,000 Selling Price	\$ 1,283	Principal and Interest
<u>\$ 11,200</u> Down Payment (5%)	\$ 240	Taxes and Insurance
\$212,750 Mortgage Amount	<u>\$ 130</u>	Private Mortgage Insurance [PMI required when downpayment is less than 10%]
	\$1,612	Total Monthly Payment

Here the family would have to earn at least \$64,440 to qualify for a mortgage in the amount of \$212,750. (Assuming that housing costs are not greater than 30% of income).

A modest **2% increase** in interest rates from 5.75% to 7.75% would result in an increased monthly payment of \$241.

Example: Multi- Family Home Ownership Analysis

Based on a three family property with rental income at \$600 per unit (75% of \$800)

Based on a \$237,500 Loan:

\$250,000 Selling Price	\$ 1,386	Principal and Interest
<u>\$ 12,500</u> Down Payment (5%)	\$ 300	Taxes and Insurance
\$237,500 Mortgage Amount	<u>\$ 130</u>	Private Mortgage Insurance [PMI required when downpayment is less than 10%]
	\$1,816	Total Monthly Payment
	<u>\$ 1,200</u>	Less Rental Income
	\$ 616	Adj. Monthly Mortgage Payment

Here the family earning \$33,000 would qualify for a mortgage in the amount of \$237,500 (Assuming that housing costs are not greater than 30% of income and gross housing ratio (calculated without utilizing rental income) is not greater than 50%.

Figure C-20 Multi-Family Home Ownership Analysis
Source: Greater New Bedford Multiple Listing Service

Homeownership Analysis Discussion. Single Family Home Sales for the period 2/15/04 – 4/22/04 have averaged selling price of \$224,114. For prospective first-time moderate homebuyers, defined as below 80% of the 1999 median income or \$34,880, the affordability gap is significant. Family would have to earn at least \$64,440 to qualify for a mortgage in the amount of \$212,750. (Assuming that housing costs are not greater than 30% of income). This would include a 5% down payment in the amount of \$12,500.

A modest 2% increase in interest rates from 5.75% to 7.75% would result in an increased monthly payment of \$241. Clearly, the affordability gap can be a major impediment to homeownership.

Rental Housing Market Analysis Discussion. The rental market in New Bedford, like much of Massachusetts, remains strong. In Figure C-21 the average rent for a studio apartment in 2002 was \$483 compared to \$575 in March of 2005. This trend is similar with regard to the one, two three and four bedroom apartments. In all, rents have increased approximately 16% during the last three years.

According to HUD, housing is “affordable” when housing costs do not exceed 30% of a household’s combined income. The National Low Income Housing Coalition prepares a report “Out of Reach”. This report examines the annual income of residents and their ability to afford rental housing. In 2001, the FMR for a one-bedroom apartment was \$640. Based on paying no more than 30% of income for housing, an individual would have to earn \$25,600 to afford a one bedroom apartment in 2001. Based on that rent and income, an individual would have to earn \$12.31 per hour. An individual earning the minimum wage would have to work over 70 hours per week in order to afford a one-bedroom apartment in New Bedford.

Data collected from Southeast Regional Planning District (SRRPED) suggested, “A realistic measure of the income required to have a safe and decent though basic standard of living” through a chart it calls Monthly Family Budgets prepared by the Economic Policy Institute. The chart makes

provisions for food, housing, transportation, health care, taxes, and other categories and indicates monthly and yearly totals needed to live in New Bedford.

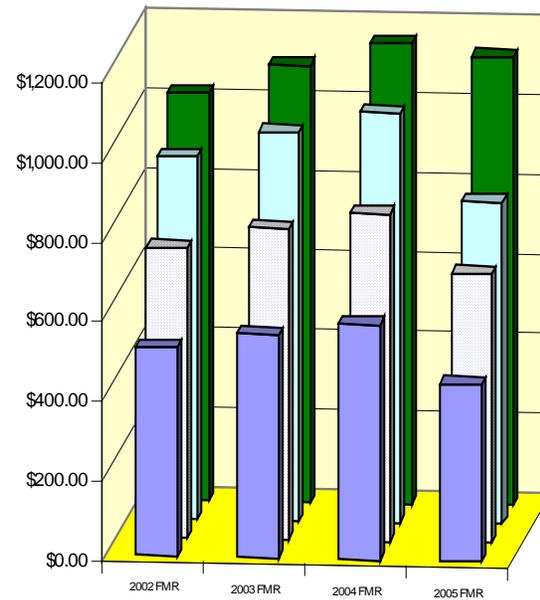
	March '02	March '03	March '04	March '05
STUDIO APT	\$483.67	\$528.00	\$485.83	\$575.92
1 BDRM APT	\$511.47	\$588.61	\$587.14	\$594.78
2 BDRM APT	\$697.89	\$700.10	\$687.79	\$706.46
3 BDRM APT	\$845.00	\$841.04	\$ 810.99	\$822.41
4 BDRM APT	\$1,000.00	\$1,092.31	\$979.74	\$1,158.33

Figure C-21 Comparative Market Rental Rates
Source: HUD

Of particular concern in New Bedford is the Fair Market Rent. In 2004, the City of New Bedford’s geographic area was changed from a PMSA area comprising contiguous towns to a newly established MSA area. This resulted in a recalculation of Fair Market Rents in New Bedford. The results of the changes in the FMR’s in New Bedford are dramatic. Figure C-21 depicts the comparison of FMR’s from 2002 to 2005. In 2004, the FMR for a two-bedroom apartment was \$823. In 2005, that same two-bedroom apartment had a FMR of \$677, a decrease of \$146. The 3 bedroom FMR decreased from \$1,029 to \$810 during the same period. The lower FMR are already having a major impact on the rental housing market through the Section 8 program and also the substantial number of HOME assisted projects that base the HOME rents on the FMR.

Rent	Households	Percent
Less than \$200	2,238	11%
\$200 to \$299	2,209	11%
\$300 to \$399	3,286	16%
\$400 to \$499	4,990	24%
\$500 to \$749	6,877	33%
\$750 to \$999	1,098	5%
\$1,000 or more	220	1%

Figure C-22 New Bedford’s Monthly Rents
Source: HUD



	2002 FMR	2003 FMR	2004 FMR	2005 FMR
■ STUDIO APT	\$524.00	\$562.00	\$592.00	\$447.00
□ 2 BDR APT	\$728.00	\$781.00	\$823.00	\$677.00
□ 3 BDR APT	\$909.00	\$976.00	\$1,029.00	\$810.00
■ 4 BDR APT	\$1,021.00	\$1,096.00	\$1,155.00	\$1,127.00

high-risk communities were: 84%, 90%, 86%, 90%, and 69%, respectively. Between 2001 and 2002, with the exception of New Bedford, incidence rates dropped in all of these communities.

In total, between 21,370 (59%) and 26,528 (72%) housing units in New Bedford are at the highest risk for lead-based paint hazards. Although the number of reported lead poisoning cases continues to decline each year, there continues to be a serious demand for lead-safe housing that is affordable to low-income families. The locations of reported cases resemble the areas where there are high concentrations of poverty.

Areas of Low- and Moderate- Income Populations and Minority Population Concentrations: The maps depicted in Figure 4.12 show the areas in the City where the minority population is greater than 50% of the total population and the low and moderate-income population is greater than 51% of the total.

The City defines an area of minority concentrations as one that has 51 percent or more minority population, which is 2 ½ times the City's overall minority population. New immigrants from countries from around the world over the last decade coupled with historic settlement patterns have contributed to the concentration of racial and ethnic communities.

Furthermore, the desire to live in areas with lower housing costs has also contributed to the concentration.

Year	Units	Percent
2000 to 2004 (permits)	474	1%
1999 to 2000	173	0%
1995 to 1998	400	1%
1990 to 1994	828	2%
1980 to 1989	2,064	5%
1970 to 1979	3,730	9%
1960 to 1969	4,070	10%
1950 to 1959	4,405	10%
1940 to 1949	5,123	12%
1939 or earlier	20,718	50%

Figure C-24 Age of Housing
Source: US Census

The location and condition of housing plays an important role in the vitality of the City's neighborhoods. It is connected to housing values, education and access to jobs.

While approximately 61% of the City is deemed low and moderate income, for the purposes of defining higher concentrations of LMI persons within the community, the OHCD has established that those areas where there are over 70% LMI persons shall be considered an area of low and moderate income concentration. Similarly, those areas where over 30% of the population is minority shall be considered areas of minority concentration. Overlaying these LMI and minority areas, then, will result in a depiction of areas within the City for community investment opportunities.

The City defines an area of low-income concentration as an area, which has a poverty rate of 30%, which is approximately twice the City's overall poverty rate of 15.6 percent. According to the 2000 Census, 15.6 percent of

households for whom poverty is determine are living at or below the poverty level; 11.7 percent families are living at or below the poverty level; and 27.5 percent of families with female householder, no husband present are living at or below the poverty level. A higher concentration of residents with incomes below poverty can be found adjacent to the City's central core.

Housing Supply, Housing Demand and Housing Condition. New Bedford has a traditional housing stock that consists of: single family detached homes; single family attached homes; town homes; condos; duplexes; triplexes; multi-units; and apartments.

Most of the properties constructed in the last century were stick built with clapboard or shingle exteriors. The lack of energy efficiency during construction adds to the total costs to maintain the older housing stock. Many older homes have a myriad of Building or Housing Code problems. Heating, plumbing and electrical systems may have been updated since original occupancy but may not be code compliant due to recent changes.

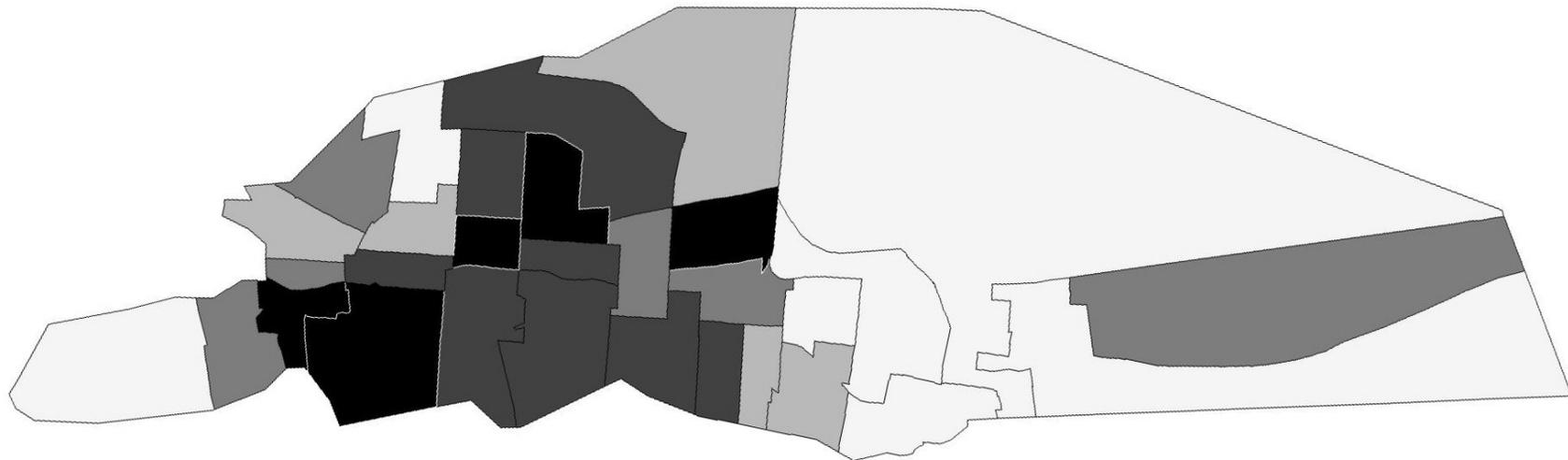
E. Maps

The following maps supplement the discussion within this Section and include information on the following:

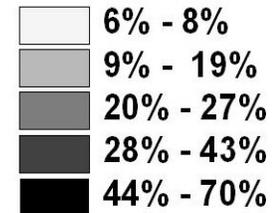
- Percentage of minority population by census tract
- Number of minority households by census tract
- Percentage of Hispanics by census tract
- Percentage of Population living in poverty by census tract
- Percentage of Population in Owner-occupied households by census tract as of 2005
- Percentage of Multi-Family Units by Census Tract
- Median Age of Housing by Census Tract

Percentage of Minority Population by Census Tract

City of New Bedford, Massachusetts



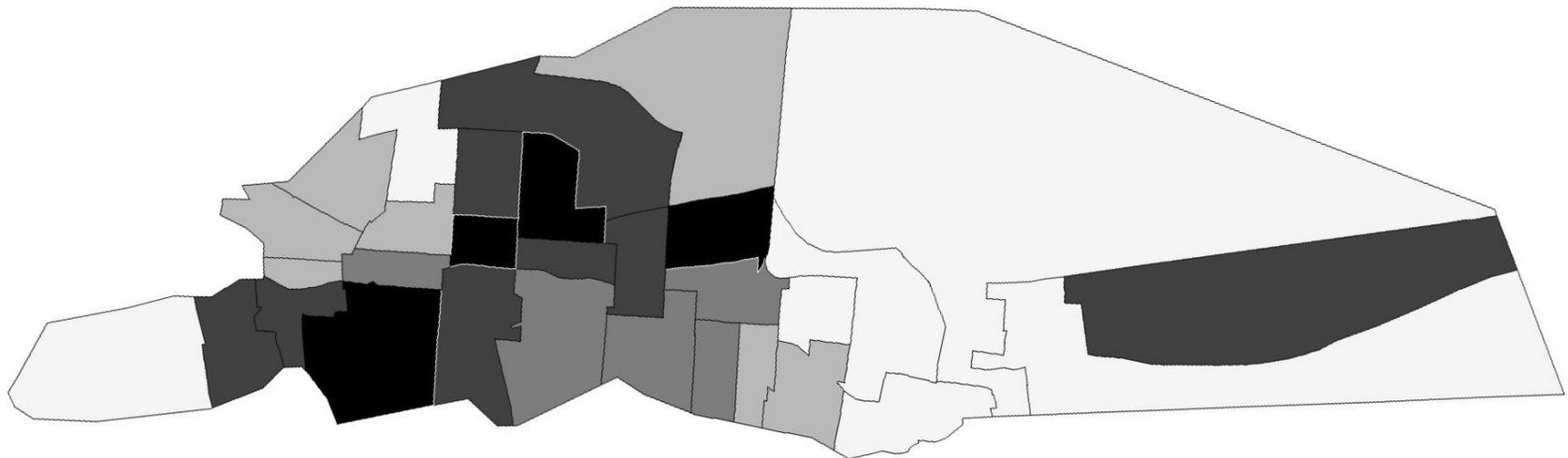
Percentage of Minority Population



Source: FFIEC Geocoding System.2005

Number of Minority Households by Census Tract

City of New Bedford, Massachusetts



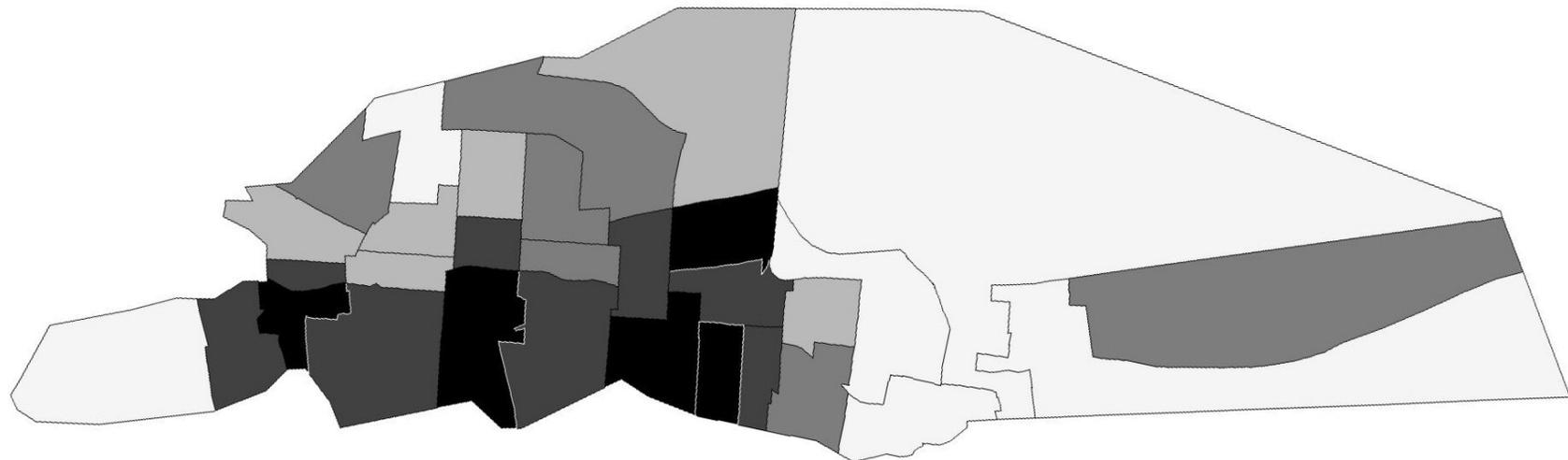
Number of Minority Households



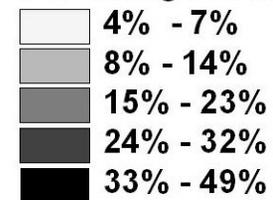
Source: FFIEC Geocoding System.2005

Percentage of Hispanics by Census Tract

City of New Bedford, Massachusetts



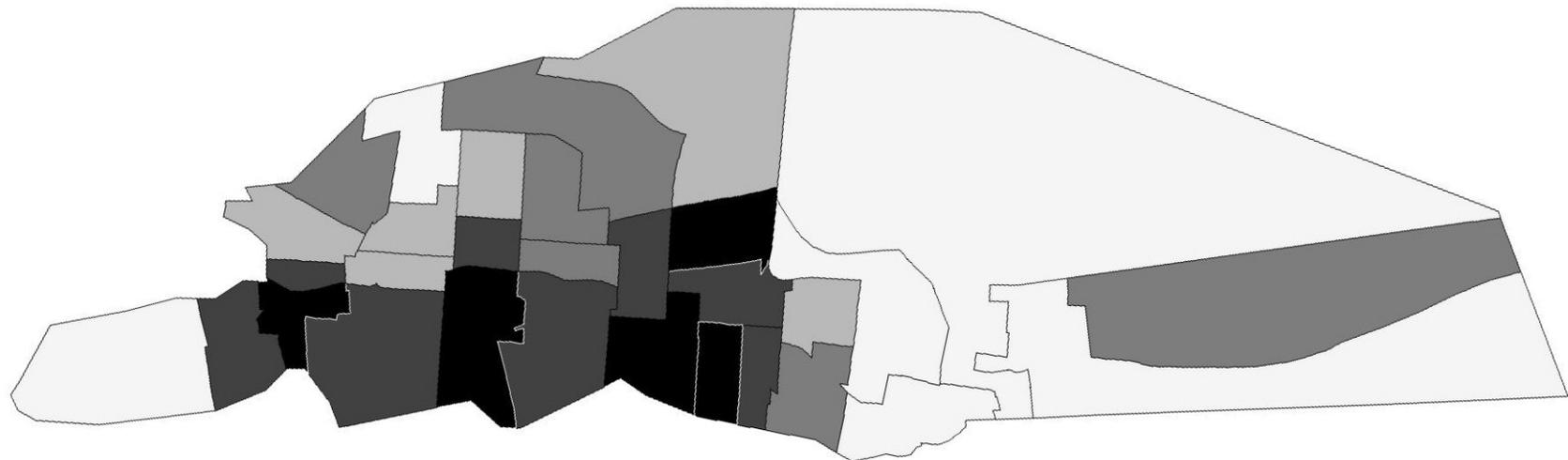
Percentage of Hispanics



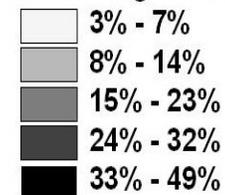
Source: FFIEC Geocoding System.2005

Percentage of Population Living in Poverty by Census Tract

City of New Bedford, Massachusetts



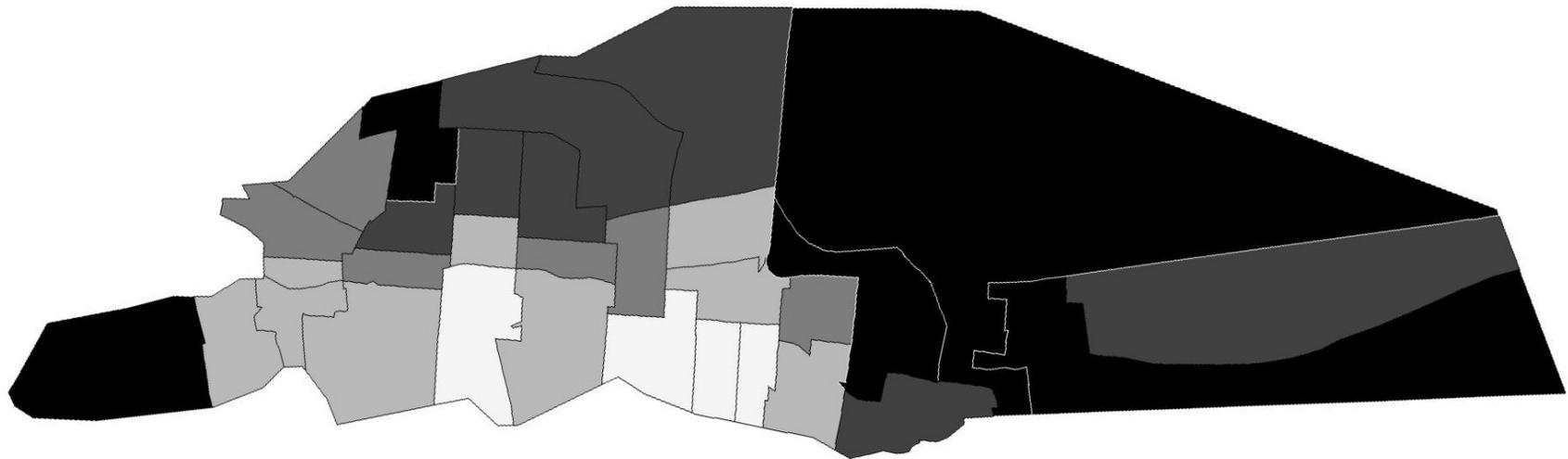
Percentage of Population living in Poverty



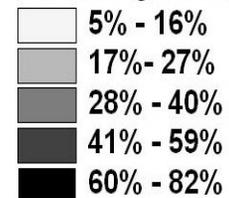
Source: FFIEC Geocoding System.2005

Percentage of Population in Owner-Occupied Households by Census Tract

City of New Bedford, Massachusetts



Percentage Owner-occupied households



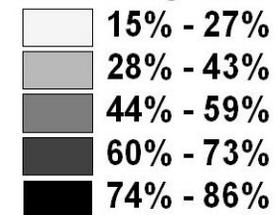
Source: FFIEC Geocoding System.2005

Percentage of Multi-Family Units by Census Tract

City of New Bedford, Massachusetts



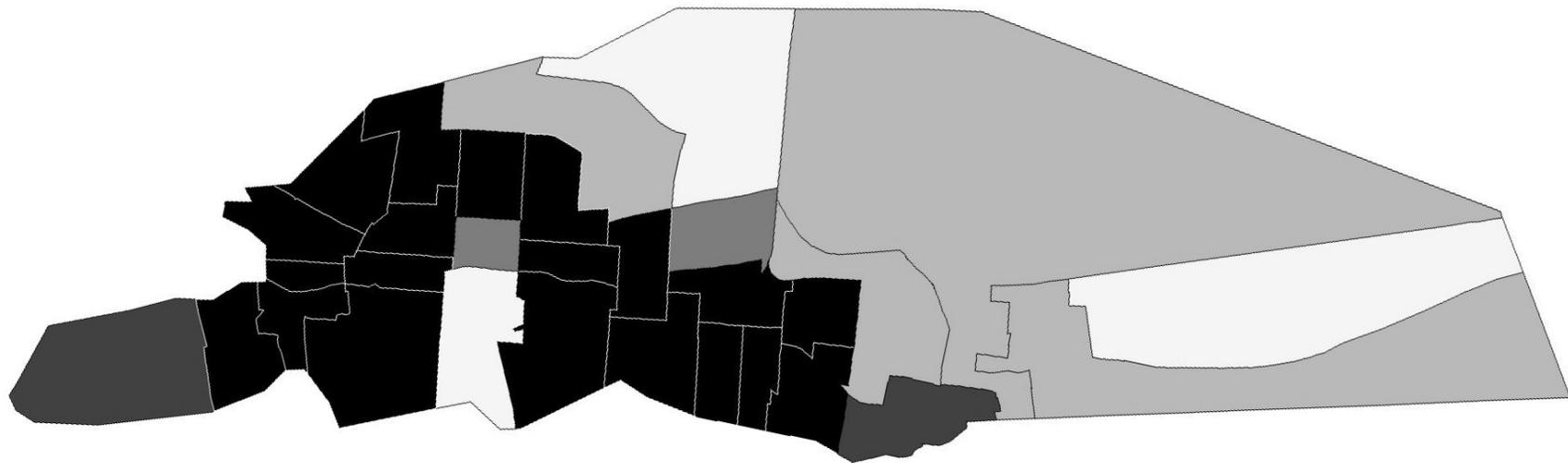
Percentage of Multi-Family Units



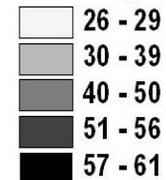
Source: FFIEC Geocoding System.2005

Median Age of Housing Stock by Census Tract

City of New Bedford, Massachusetts



Median age of housing stock by census tract



Source: FFIEC Geocoding System.2005

Page left intentionally blank.

City Based Housing Programs 2001 - 2005

2001	CDBG					HOME					TOTALS							
	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
56	56	6	8	0	19	85	45	19	4	1	18	141	101	25	12	1	37	
		11%	14%	0%	34%			42%	9%	2%	40%			25%	12%	1%	37%	

2002	CDBG					HOME					TOTALS							
	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
51	51	12	10	1	30	19	19	6	4	1	9	70	70	18	14	2	39	
		24%	20%	2%	59%			32%	21%	5%	47%			26%	20%	3%	56%	

2003	CDBG					HOME					TOTALS							
	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
39	39	7	15	1	19	20	20	4	8	0	10	59	59	11	23	1	29	
		18%	38%	3%	49%			20%	40%	0%	50%			19%	30%	2%	49%	

2004	CDBG					HOME					TOTALS							
	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
58	96	11	10	6	70	63	58	14	8	3	26	121	154	25	18	9	96	
		11%	10%	6%	73%			24%	14%	5%	45%			16%	12%	6%	62%	

2005	CDBG					HOME					TOTALS							
	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld	Units Asstd.	Hshlds Asstd.	Minorities			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
41	61	8	12	2	37	30	27	8	4	0	13	71	88	16	16	2	50	
		13%	20%	3%	61%			30%	15%	0%	48%			18%	18%	2%	57%	

D. Fair Housing Legal Status



A. Fair Housing Law Context.

As noted at the outset of this report, the federal government passed the Fair Housing Act in 1968, making it illegal to deny housing to potential renters or homeowners based on their race, color, religion or national origin. Twenty years later, familial status and handicap were added to this list of protected categories. In the Commonwealth of Massachusetts, fair housing laws include all of these federal categories in addition to marital status, sexual orientation, age, veteran status and source of income.

The Home Mortgage Disclosure Act of 1975 afforded additional protection for potential homebuyers by requiring lenders to disclose their actions on individual loan applications [including the applicant's race, income and ethnicity] and information as to whether or not the applicant was approved for a loan. Two years later the Community Reinvestment Act created a mechanism whereby inequities in lending practices to racial minorities, ethnic minorities and low-income residents would be reversed and greater access to mortgage capital by those falling within this demographic would be improved.

Even with these legislative measures at the federal and state level, discrimination continues to impact lives. Unfortunately much of the difficulty in understanding and capturing data about discriminatory practices—and thus impediments to fair housing choice—is affected by the subtleties through which discrimination occurs. For example, discrimination can be found in the property management office that, despite having an explicit and posted non-discrimination policy, may be staffed by an employee whose own behavior prevents clients from moving in to a unit of their choice in a way that leaves little evidence of the discriminatory persuasion that subtly took place.

Although the remainder of this section primarily addresses discriminatory-based impediments, it is important to recognize that market factors can also pose a significant impediment to attaining housing as it disproportionately effects minority populations and those of lower incomes.

B. Fair Housing Complaints/Compliance Reviews: Fair Housing complaints and compliance reviews where a charge has been issued or a finding of discrimination has been made.

As noted previously in this section, one of the most significant impediments to fair housing choice is discrimination. Discriminatory practices in selling, renting, lending or insuring housing are obvious impediments to free housing choice among members of protected classes of people. In addition to what one may perceive as overt discriminatory practices, however, are also very subtle circumstances that may occur that effectively impede the opportunity for protected groups to enjoy maximum housing choice.

The City of New Bedford has collected data on individual discriminatory actions for which complaints had been formally filed with the Massachusetts Commission Against Discrimination [MCAD]. Although the City received no fair housing complaints, directly, during the period between 2001 and 2005, seven [7] cases were filed with MCAD [See figure D-1]. All nine of these cases have been closed as of the production of this report.

Complaint ID	Date Filed	Complainant	Respondent	Basis of Alleged Discrimination	Acts of Alleged Discrimination	Status	Date Closed
031501926	7.25.3	Ribeiro	NB Housing Authority	Disability	Denied Reasonable Accommodation	Closed—Lack of Probable Cause	9.24.3
041502352	8.20.4	Johnson	Executive Director, NB Housing Authority	Disability	Denied Reasonable Accommodation	Closed—Withdrawn	10.18.4
041602781	10.8.4	McCagney	NB Housing Authority	Disability	Denied Reasonable Accommodation	Closed—Lack of Probable Cause	2.1.5
051500430	2.17.5	Strunk	NB Housing Authority	Disability, Sex	Other terms, conditions or privileges	Closed—Investigation not authorized	3.25.5
051501238	5.4.5	Granados	City of New Bedford Housing Authority	Creed, Race/Color	Other terms, conditions or privileges	Closed—Investigation not authorized	5.13.5
051501564	6.9.5	Ribeiro	NB Housing Authority	Disability	Denied Reasonable Accommodation, Eviction or threatened eviction	Closed—Lack of Probable Cause	7.19.5
051501848	7.19.5	Smiley	NB Housing Authority	Disability	Denied Reasonable Accommodation	Closed—Withdrawn with Settlement	10.27.5

Figure D-1

Source: MA Commission Against Discrimination

C. Fair Housing Discrimination Suits Filed: Suits filed by the Department of Justice by Private Plaintiffs

According to MCAD, none of the cases identified in figure D-1 ever went to court. All cases were subsequently closed as having fallen into one of the following categories:

- Pre-Determination Settlement: Before MCAD arrived at a decision regarding the outcome of the investigation the parties agreed to enter into an agreement for closure of the complaint, or;
- Administrative: The Complainant dropped out of sight, moved without giving any further address where to contact him/her, failed to cooperate with the investigation and a certified mail return receipt requested has been returned to MCAD. This is the most common reason for a case being closed.

D. Analysis of Trends and Patterns

While MCAD has not analyzed the reasons, trends or patterns of discrimination cases originating in New Bedford, specifically, it has, however, conducted some analysis around the actual numbers of complaints filed. These small figures have convinced MCAD that there are probably more cases of housing discrimination in existence than those that have been actually reported. It is therefore important to understand, therefore, why those individuals and families that feel as though they have been discriminated against in housing choice have opted not to report their experiences to MCAD. In considering this, the Commission has offered the following hypotheses:

- Lack of Education. MCAD suggested in 2002 that there had been a lack of information getting into the community in New Bedford about individual and family rights in terms of housing that could be improved upon through the City's introduction of an educational campaign regarding fair housing. The City subsequently recognized the importance of providing such educational fair housing information to its residents directly and has, through it's Office of Housing and Community Development, introduced information on the City website about housing rights, directions as to how one may file a complaint and how one may find additional information about fair housing. There is also direct contact information offered in Portuguese and Spanish with telephone numbers for more information. A discussion that elaborates on the breadth of this education program and additional components that might remedy the education gap and diminish impediments is furthered in Section E of this report.

- Lack of Fair Housing Enforcement Agency Presence. New Bedford’s Office of Equal Opportunity [EEO] had, at one time, been responsible for taking housing discrimination complaints through a contractual agreement with MCAD but no longer serves in this capacity. As of 2005, the Office of Housing and Community Development has undertaken the primary role of educating and working with the public in matters of fair housing and discrimination. Through its website at www.ci.new-bedford.ma.us/ohcd.htm individuals and families now have an electronic agency presence that affords them the kinds of resources once offered through the City’s EEO. As noted previously, a further discussion of this access is included in Section E of this report.

E. Discussion of Other Fair Housing Concerns or Problems

Any discussion relative to fair housing choice must always be mindful of both discriminatory practices and market factor impediments that have bearing upon both rental and ownership opportunities.

While discrimination or the inadvertent effects of market conditions can negatively affect those individuals and families attempting to secure rental housing, prospective homeowners requiring a mortgage and mortgage insurance may face additional discriminatory practices. A study of Home Mortgage Disclosure Act [HMDA] data, the City’s Office of Housing and Community Development found that minority applicants in New Bedford are considerably more likely to be denied loans than white applicants who are similarly situated.¹ One could suggest that the disparity in the percentage of loans denied to minorities [almost 20%] compared with those denied to whites [11%] in similar census tracts may be related to behaviors and predispositions of individual loan officers in the exercise of their discretion in underwriting loans.

A study conducted by the Federal Home Loan Bank of Boston in 1989 furthered this theory by arguing that “not only are low-income white applicants less likely to be turned down than high-income minorities, but for the same imperfections, whites seem to enjoy a general presumption of creditworthiness that black and Hispanic applicants do not, and lenders seem to be more willing to overlook flaws for white applicants than for minority applicants.” The report, which relies on HMDA data, goes on to suggest that because the HMDA only requires banks to keep records on people who actually submit mortgage applications, the problem of disparate treatment discrimination is potentially greater than is represented by the data because applicants may be turned down or simply discouraged during the pre-application process.

¹ According to the Federal Financial Institutions Examination Council [FFIEC], minority applicants were almost twice as likely than white applicants similarly situated—that is, residing in the same census tract—to be denied loans between 2001 and 2004.

In addition to discriminatory practices, the availability of housing and correlating homeownership also plays a critical role in understanding the extent to which minorities are able to obtain housing in New Bedford. In 2003 the overall homeownership rate in the City of New Bedford was 44%--a figure that has remained virtually stagnant since 1990. Unlike the City, the Commonwealth's homeownership rate is significantly higher at 64%, a figure more comparable with a 68% national homeownership level. Lower homeownership rates can be explained, in part, by the lower proportion of owner-occupied housing units and by a lack of affordable owner-occupied housing.

Within the realm of homeownership, only 11% of all New Bedford households are racial/ethnic minority-owned contrasting sharply with the Commonwealth's 27% ownership rate for racial/ethnic minority households and even moreso against the 39% national average for minorities.²

Section C. of this report furthers this discussion in exploring homeownership considerations within the context of the City's Housing Profile.

² Mumford Center, University of Albany 2005

E. Impediments

“Although the Fair Housing Act of 1968 made it illegal to discriminate in selling, renting or financing housing in America, recent studies we have conducted show housing discrimination is alive and well in the United States...”

--Alphonso Jackson, Secretary of HUD



Impediments to Fair Housing Choice

Despite the passage of laws, the promulgation of regulations and the conscientious effort of many, barriers to obtaining fair housing remain on the local, state and national levels. These impediments to fair housing choice manifest themselves in both the public and private sectors, oftentimes through the very regulatory mechanisms and supportive apparatus employed to avoid such barriers. This section will explore key areas within these two sectors from which impediments to fair housing choice can arise while considering opportunities for remediation.

A. Public Sector

In this review of key public sector impediments, municipal, regional and state-based elements germane to this discussion include: municipal considerations, the dilemma of expiring use, housing authority issues, neighborhood revitalization and the transportation linkage between housing and employment.

Municipal Considerations

1. Land Use Policy

Because how land is used—and the extent to which it *may* be used under land use regulations—is central to the discussion of housing and commercial development, the affordability of housing, transportation, the location of services and similar components relative to the availability of safe, decent, affordable housing, zoning regulations take on a particularly significant role in achieving fair housing choice.

New Bedford zoning regulations are in compliance with the State requirements under MA General Laws [MGL] c.40A and c.41 [Subdivision Control Laws]. The zoning regulations in New Bedford, as far as residential classifications are concerned, are some of the least restrictive within the Commonwealth. Current minimum lot sizes are 8,000 square feet and 75 feet frontage for all single-family districts and 10,000 square feet and 100 feet frontages for all two family districts. These dimensions were changed in 2003; prior to that time minimum lot sizes were 4,800 square feet for single and 6,000 square feet for two family dwellings, with 50

feet and 60 feet frontages, respectively. Multi family dwellings, whose aggregate units number 27,956 square feet or 68% of the total housing unit stock, required a minimum lot size of 10,000 square feet and 100 feet of frontage prior to 2003. The placement, parking requirements and screening/landscaping of relative to the development of these units is subject to a site plan review process, which considers aesthetics and circulation, but not resulting density. To help reinforce these lot size and frontage requirements, the City requires 2 off-street parking spaces for each residential dwelling unit. These dimensional and parking allowances contrast with neighboring towns that have enacted zoning densities ranging from ½ acre to two-acre residential lot sizes and excessively restrictive multi-family density requirements.

New Bedford's zoning regulations were reviewed, updated and formally revised in 2003. In addition to their liberal allowances dimensionally, these ordinances have strengthened the as-of-right use of accessory and "in-law" type apartments and has created four mill overlay zoning districts that permit the conversion of abandoned mill buildings to residential uses after full environmental remediation. In this way developers may reuse existing infrastructure rather than having to develop new construction on vacant land not served by utilities. By employing such *Smart Growth* principals in its zoning ordinance, the City of New Bedford has furthered opportunities that provide cost-efficient, environmentally sensitive mechanisms for developing residential properties thereby increasing the City's inventory of safe, decent and affordable housing—an inventory critical to furthering fair housing opportunities.

In addition to these zoning ordinances, the City anticipates evaluating and redesigning its land use policies with respect to the existing public transportation system to more effectively serve new lower income population centers by assisting in the deconcentration of poverty through connections of such residential areas with vital retail and service areas. Beyond such zoning and transportation policies, the City will continue to proactively move toward reducing and eliminating impediments to fair housing choice—as well as correlating impediments to employment and transportation—by following through on:

- Streamlining the City's permitting processes in order to remain competitive to the emerging redevelopment forces that are discovering the quality of life in the SouthCoast area of Massachusetts.
- Working more closely with the New Bedford Housing Authority to understand its short and long range plans for the increased production and replacement of affordable units, so as to better prepare for the associated social and capital improvements which must be simultaneously undertaken these areas.

- Evaluating the remaining industrial land and building inventory to more fully understand the quality of life, demographic and economic issues associated with the conversion of abandoned industrial properties versus the possibilities of demolition and reuse of the land beneath for a variety of new uses, including housing.
- Further analyzing the need for sustained housing production, both low and high density. The cause of the recent population loss in New Bedford is not yet fully understood. If further analysis points to the fact that choices in housing were a factor in migration out of the City, then it will be the defining variable that has been sought in explaining the City's population loss.

2. **Property Tax Policies**

Property tax policies can impact housing choice by increasing the cost of owning and operating a house. While property taxes paid to a municipality cannot be eliminated altogether, the City of New Bedford Assessor's Office eases the potential for this impediment by administering real estate tax exemption programs and abatement requests as allowed under Massachusetts law. Generally, Taxpayers may apply for a "Valuation Abatement" through an appeal process to those who believe their properties are overvalued.

Exemptions to real estate taxes granted by the City are governed under strict Massachusetts law and are offered to persons fulfilling the requirements of any one, or more, of the following categories:

- Blind
- Veteran with a service connected disability
- Surviving Spouse or Aged Person
- Minor Child of Policeman or Fireman Killed in Line of Duty provided that other parent is also deceased
- Surviving Spouse of Policeman or Fireman killed in Line of Duty unless remarriage occurs.
- Senior Citizen, Age 70 or older
- Hardship, based on a Mandatory Combination of Age, Infirmary and Financial Distress
- In-Law Apartment (Owner provides housing for person 60 years or older who is not the owner)

Under Massachusetts law the City can also defer [as opposed to exempt] taxes for elderly property owners over the age of 65 who qualify. This Property Tax Deferral program is available to assist the senior population from retaining their existing housing by placing a lien on the property.

3. Other Municipal Elements

The presence of impediments to fair housing choice as well as opportunities to creatively address and remedy such impediments can be found outside of land use policies and property tax mechanisms in the public sector, most particularly through city boards, city staffing and public education and outreach.

City Boards Affecting Fair Housing: The City's Planning and Zoning boards have a particularly significant impact in achieving fair housing; as such it is imperative that the City maintain rosters that represent the diversity of the New Bedford population, both in racial and ethnic composition but also with respect to economic diversity.

- Planning Board. At present the City's Planning Board is a five-member board. The Mayor appoints all five members of the Board who are then confirmed by the City Council. The composition of the Board as of July 2006 Board was four white males and one black male.
- Zoning Board of Appeals. New Bedford's Zoning Board of Appeals is comprised of five members and four alternate or associate members. Each member has one vote, and the associates are only called upon to make a quorum, based on member absence. They have a vote in these situations. As of July 2006 the composition of the ZBA [both members and alternates] was four white males, one black male and three white females. In addition to this roster there was one vacancy on the board, itself, that remained unfilled as of the publication of this report.

City Staff Working toward Improving Housing: Many of the activities and responsibilities of City staff revolve around residential issues and the maintenance of safe, decent and viable living environments that build up and stabilize families and neighborhoods. Several City offices and City staff positions have a particularly direct responsibility in this vain including:

- Neighborhood Liaison. The Mayor's Office maintains a neighborhood liaison position responsible for working with all of the City's neighborhood groups, neighborhood associations and constituencies in assuring that the residents' voices are heard, services are properly maintained and critical issues are expeditiously addressed at the pragmatic as well as policy levels as may be needed. Through this position the City has an opportunity to maintain a healthy viability of its neighborhoods and continue its important work in addressing abandoned buildings, vacant lots and blight.

- The Office of Housing and Community Development [OHCD]. The City's OHCD engages residents, non-profit organizations, developers and the general public in articulating the City's needs and priorities for expanding the stock of safe, decent and affordable housing, stimulating economic development, supporting programs and services for community development and revitalizing neighborhoods; in so doing it administers strategies and undertakes initiatives that effectively utilize federal funding resources that assist low and moderate income residents achieve their vision of a healthy and viable community. Among its efforts, the OHCD administers a number of housing programs that provide assistance to both individual and large scale developments that include projects ranging from the installation of a wheelchair ramp for several thousand dollars that allows an elderly person to remain in his or her home to multi-million dollar projects that leverage significant public and private resources in producing multi-unit affordable apartment complexes.
- The Office of Community Services [OCS]. Language and cultural barriers pose a significant challenge for many residents within the City of New Bedford and can be an impediment to one's ability to secure fair housing. To this end the OHCD funds several positions within the OCS that work to bridge the cultural and linguistic divide that exists for non-English speaking residents.

The Dilemma of Expiring Use.

1. Sale of Subsidized Housing and Possible Displacement

Falling within the realm of "public" sector factors to be considered in this discussion of impediments to fair housing is the conversion of publicly subsidized units (Project-based Section 8 units) and state or federally subsidized or insured mortgages¹ that could be prepaid and effectively converted into market-rate housing. Such conversions typically occur at the end of the term of Project-Based Rental Assistance Contracts (PRAC) with HUD. These incidences of "expiring use" can drastically affect one's ability to remain in affordable housing as it negates the property owner's obligation to carry the affordable units.

The Citizens Housing and Planning Association (CHAPA) produces the most comprehensive listing of Project-Based and privately owned governmentally-involved housing in Massachusetts whose affordability is threatened with the reality of having an "expiring use." Currently that listing includes a number of residential projects in New Bedford presented in Figure E-1; properties that have already expired are depicted in Figure E-2. These developments have all been prepaid and have opted out of their Section 8 contracts. The loss of these units, alone, represents over 330 units of affordable housing units lost in New Bedford.

¹ These mortgages originally imposed affordability requirements [e.g. requiring the owner to limit rental of some or all units to households with incomes below a certain level at admission and by limiting rents that can be charged for those units] for the term of the mortgage.

Property Name	Agency	Total Units	Section 8 PBA Units	Section 8 Expiration Date ¹	Original Subsidy Units	Subsidy Units Lost	Current Units Assisted	Units at Risk - 2010
Bayberry Housing	PRIVATE	184	184	4.2.8	184	0	184	184
Bedford Towers	MHFA	157	155	5.19.5	155	0	156	0
Car Barn	MHFA	114	114	9.30.10	114	0	114	114
Dawson Building	HUD	32	32	12.31.4	32	0	32	32
Harborview Towers	HUD	144	88	5.31.4	144	0	144	144
Inter-Church Housing	HUD	44	44	11.5.6	44	0	44	0
Mechanics Square Partnership	PRIVATE	25	25	6.13.5	25	0	25	25
King Village	MHFA	69	0	n/a	68	0	68	0
Melville Towers	HUD	320	319	8.31.5	320	0	320	320
Olympia Towers	HUD	90	89	10.3.4	89	0	89	89
Taber Mill Apartments	MHFA	150	150	4.21.11	150	0	150	0
United Front Homes	MHFA	200	80	3.1.18	200	0	200	200
Wamsutta Apts.	MHFA	78	25	3.1.17	78	0	78	0

Figure: E-1: Expiring Uses in New Bedford
Source: Citizens Housing and Planning Association [CHAPA] Data Base 2004

Property Name	Agency	Section 8 Units Lost	Assisted Units Lost	Total Units
Buttonwood Acres	HUD	0	132	132
Clarkwood Apartments	HUD	0	30	30
Rockdale West	HUD	57	57	168

Figure: E-2 : Properties already lost to Expiring Uses
Source: Citizens Housing and Planning Association [CHAPA] Data Base 2004

In addition to the loss of these subsidized units, additional units throughout the City are facing a similar fate in the coming months and years. CHAPA's inventory identifies over 1,100 additional subsidized units at risk of leaving the affordable housing inventory through mortgage prepayment, fully amortized mortgages or termination of HUD PBA contracts by December 31, 2010.

¹ There are projects that currently list an expiration date that has already passed; this does not necessarily mean that the owner has opted-out of the contract, and may be due to delayed reporting by HUD.

2. **Legislation**

The City of New Bedford is not alone in the experience of such an expiring use crisis; indeed this is a phenomenon experienced in communities throughout the Commonwealth. In 1998 the state legislature attempted to provide relief from expiring uses to cities and towns. Although both houses passed the "Enabling Act to Save Affordable Housing" that would have allowed communities to prevent conversion to market rates and regulate rents for units that had been converted, then Governor Cellucci vetoed the bill. An attempt to override that veto failed and subsequent attempts to pass similar legislation have failed including *An Act Promoting Affordable Housing and Community Planning in the Commonwealth* introduced during the 2003-2004 legislative session.¹

3. **Expiring Use Repercussions**

One misunderstanding integral to the expiring use crises is how "preservation" or "sticky" vouchers work. After an owner prepays, HUD makes available, a temporary protection for eligible tenants. However, these vouchers do not maintain housing as a future affordable resource. The vouchers do not retain the development's long-term affordability. As tenants move out or pass on, the units become market units. The cost to preserve these units is far less than replacing the lost units or building more affordable housing.

Another problem beyond the fundamental issues of economic displacement and the loss of affordable housing, is the effort of some property owners to intimidate their low-income tenants to leave a property so that more units can be converted to market rent. Harassment and pressure in the form of discrimination sometimes related to neglected maintenance and renovations is something tenants face time and time again. Furthermore, the climate created after an owner has decided to "go market" is often one of anxiety and uncertainty. Inequality and disrespect causes rapid tenant migration from formerly stable communities and as a catalyst to gentrification.

Such subtle harassment methods are one way management has sped up displacement. Uneven renovations, repairs and maintenance schedules, although illegal, are used by unscrupulous owners attempting to rent as many units as market and to discourage tenants who are not of high enough income from prolonging their stay. These unfair practices send a message to tenants that they should settle for less than what higher income tenants expect and that they deserve less because they are disabled or seniors rather than an able bodied higher income person.

¹ Massachusetts Coalition for Healthy Communities

The Mass Alliance of HUD Tenants' research indicates that oftentimes "after an owner prepays, long time tenants are sometimes declared 'over housed' or 'under housed.' For many elderly tenants who have lost loved ones or no longer have children at home, they will be forced to move into smaller units or move out if the 'proper' sized units are not available. For families who have grown, they might have to move out because they are deemed under housed. The problem is when the same policies were not strictly enforced prior to prepayment but now are used to clear units for market renters. We have seen owners manipulate voucher standards in a way to maximize turn over. This type of discrimination is unacceptable and is another reason to work to keep expiring use properties as long-term affordable resources where all tenants are protected.

Housing Authority Issues

1. Tenant Selection Procedures; Housing Choices for Certificate and Voucher holders

According to data provided by the New Bedford Housing Authority [NBHA], this PHA administers 4,194 housing units, 25.4% of these units are State subsidized, 39% are Federally subsidized and 1,480 of these units are tenant-based, tenant assisted, Federal -aided leased housing (Section 8). These units provide necessary assistance to a wide range of family sizes. These units also exist in a variety of settings, whereas, the Public housing runs the gamut from 1940's construction to scattered site newer construction.

A review of the City of New Bedford Housing Authority Annual Plan 2001-2006 and the Operations Manual provided pertinent information on their Application Intake, the Wait List process, Admission Policy for Deconcentration of Family Developments, the Public Housing Drug Elimination Program Plan, and the Community Service Program Policy, the Section 8 Homeownership Program and the Residents Advisory Board for the NBHA.

According to the NBHA Operation Manual, an application intake occurs only during publicly announced time periods which all interested persons may apply for admissions to NBHA housing. When the number of applicants who can be served within a reasonable period of time is reached, the Board of Commissioners determines that the waiting list may be closed by unit size. Notice of opening of applications is made in the Standard Times newspaper as well as other suitable means. When the waiting lists for one or more areas or unit sizes are to be reopened, the NBHA clearly states in the public announcement the procedure to be employed to determine the position of each applicant on the waiting list. Applications are accepted in person or by mail.

Assignment to the wait list takes place according to the date and time that the application information was initially provided, and by the size of the unit required. At that time, the applicant is assigned a control

number and provided information on how to check their status on the waiting list and on the housing program and its requirements.

The selection process for eligible NBHA applicants is based on a local preference point value system. The local preference point values include (4) Working Families; (3) Applicant family whose head, spouse or sole member is enrolled on a full time basis in an NBHA approved, career orientated job training program or academic program at an educational institution; (2) Residents of New Bedford/Applicant family whose head, spouse or sole member lives out side of the jurisdiction, is working or has been notified that have been hired to work in New Bedford jurisdiction. Proof in the form of the letter extending the offer of employment will be required. (1) All Other Applicants- those who otherwise qualify for admissions but do not qualify for any of the preferences outlined above.

The New Bedford Housing Authority has adopted an Admission Policy for the Deconcentration of Family Developments. The policy states that the NBHA will only admit eligible qualified applicant families in accordance with the criteria of its policy on Admissions and Continued Occupancy. Further, the policy states that in achieving their goal the NBHA employs waiting list "skipping" to achieve deconcentration of poverty or income mixing goals at targeted developments. The analysis of these income types was based on their 1999 Resident Profile and 1999 Census Tract for the New Bedford area. The policy is an addendum of the NBHA's SELECTION FROM THE WAITING LIST document.

The NBHA has selected the following developments that will be used in the deconcentration of extremely low-income families by offering higher income applicants available units:

**Bay Village
Presidential Heights
Brikenwood
Westlawn
Satellite Village
Shawmut Village**

In addition, Duncan Dottin Place is used in the deconcentration of very low-income families by offering higher income applicants available units.

The foregoing policy was designed to reflect HUD's public housing reform and the recently enacted law that allows for important changes to the operation and programs of public housing and tenant-based assistance. These changes are designed to revitalize and improve HUD's public housing and tenant-based assistance programs.

The New Bedford Housing Authority also proposed a comprehensive enforcement and prevention strategy to eliminate drugs from its developments. The plan includes the addition of supplemental police patrol that reinforces personal safety and education and recreational programs that are strongly linked to academic achievement that targets at-risk families and youth. The at-risk families and youth involved in this program work closely with existing programs, such as the Police Residency Program.

In addition, the Aires Drive Educational Enhancement Center and Peacemakers Program provides educational tools for families within a neutral environment.

The New Bedford Housing Authority has also partnered with the Bristol County Attorney's Office in "Operation Safe Home". The NBHA believes that although local law enforcement efforts to date have been successful, there is question about the assistance provided through the "Operation Safe Home" program, which involves the traditional enforcement agents from the Drug Enforcement Agency, the Bureau of Alcohol, Tobacco and Firearms, and the FBI. According to the NBHA, this program also provides viable drug prevention strategies in education and youth activities through collaborations with the New Bedford School Department, New Bedford recreation Department, Boys and Girls Club, 4-H Program, and the University of Massachusetts at Dartmouth.

2. **Community Service Program**

On February 1, 2001, The New Bedford Housing Authority implemented their Community Service Policy that affects every adult member age eighteen to sixty-two residing in public housing. The policy states that in order to be eligible for continued occupancy residents between the ages of 18 –62 have to contribute eight hours per month of community service (not including political activities) within the community in which the public housing development is located, or participate in an economic self-sufficiency program or spend eight hours participating in a combination of self-sufficiency and community service activities unless he/she is exempt from this requirement. The community service activity could include volunteering at their church, school, neighborhood organizations, public housing etc.

The policy is a soft policy and does not mean to cause hardship on any particular family or cause a family to lose their apartment. The ideal resident that this policy is aimed toward is the son, daughter, nephew, niece or young adult living in the apartment with family that may be unemployed and not attending school.

According to program administrators, the program has been successful as it is implemented in stages. As tenants schedule for their yearly review and evaluation or for a new tenant, the policy is explained and implemented into their new lease at that time.

3. Section 8 Home Ownership

The New Bedford Housing Authority Home Ownership Program permits eligible participants in the Section 8 housing choice voucher program, including participants with portable vouchers, the option of purchasing a home with their Section 8 assistance rather than renting. The homeownership option is limited to 5% of the total Section 8 voucher program administered by the NBHA in any fiscal year, provided that disabled families shall not be subjected to the 5% limit. The policy also states that eligible applicants for the Section 8 Homeownership Program must have completed an initial Section 8 lease term, may not owe NBHA or any other Housing Authority an outstanding debt, and must meet eligibility criteria set forth herein.

The Section 8 Homeownership Program allows eligible participants to purchase homes within the jurisdiction of the NBHA such as a new or existing single-family, condominium, planned use developments, cooperatives, lofts, live/work units, or manufactured homes. The NBHA will also permit portability of Section 8 homeownership assistance to another jurisdiction, provided the jurisdiction operates a Section 8 Homeownership Program for which the Section 8 homeownership applicant qualifies or authorizes NBHA to administer the homeownership assistance in their jurisdiction.

4. Residential Advisory Board

A Residential Advisory Board was formed in 1999 to encourage residents to participate in a process aimed at improving and maintaining the quality of life in their particular housing community. The Residential Advisory Board meets monthly with the NBHA staff to offer suggestions as well as bring complaints from residents to the meetings.

A sampling of the list of questions/statements that was published in the New Bedford Housing Authority's 5-year plan—along with an indication as to progress made on some of these points, follows:

- What happens to a resident who, for some reason, cannot perform community service on the scheduled day? Can he/she reschedule, or would any delay constitute ground for eviction?
- There was also a concern of the Residential Advisory Board, that Community Service policies single out public housing residents and adds another stigma that may make public housing residents feel like second-class citizens.
- Regarding HOPE VI, how many handicapped apartments are planned for the Carolina Apartments? *Three of units at the Carolina apartments were renovated in order to meet the 5% requirement.*
- How far has deconcentration been accomplished? *The average annual income for public housing residents in Massachusetts is \$13,514 while residents in the New Bedford Housing Authority average \$15,381. Extremely low income [below 30% of the median family income] for MA residents is 72% while for NBHA residents it is 65%. Giving preference to working families is resulting in deconcentration of poverty throughout the jurisdiction. Deconcentration is working in New Bedford.*
- Would a working couple with no children be a top priority? *Workers with—or without—children get preferential treatment.*
- Does the New Bedford Housing Authority recognize the Resident Board? *The NBHA recognizes the Authority-wide Resident Advisory Board which periodically meets to discuss pertinent issues. There is also an active resident board at Caroline Street and at the Boa Vista Elderly Towers. One NBHA Commissioner is a tenant representative that is appointed by the Mayor.*

Neighborhood Revitalization

While access to funding, availability of housing stock and the burden of regulations may actually prove to be an impediment to fair housing for many, less obvious, perhaps is the impediment related to a deteriorating neighborhood that signals both public and private disinvestment. Increased crime, decreased services and the presence of blight easily impede one's ability to secure affordable, safe housing. Conversely, New Bedford's ability to maintain safe, decent and affordable housing within safe, intact neighborhoods is critical to enticing and retaining homeowners and building true community. Strong neighborhoods—both physically and socially—typically exhibit a cohesiveness that invites investment and sustainability, the byproduct of neighborhood revitalization.

In keeping with the City of New Bedford's mission to increase its stock of safe, decent, affordable housing while revitalizing its neighborhoods, the Office of Housing and Community Development [OHCD] has instituted a comprehensive Neighborhood Revitalization Strategy. The goal of this strategy is to remove blight and significantly improve the quality of life in some of New Bedford's most deteriorated neighborhoods. To this end, the OHCD has identified five Revitalization or Target Areas in which to concentrate its improvement initiatives and provide incentives for reinvestment. These five Revitalization Areas are:

- **North End:** Including most of census tract 7 and a four-block area in census tract 12, this area is bordered by Coggeshall St. to the south, Belleville Ave. to the east, Coffin Street to the north, and the Conrail tracks/Ashley Boulevard area to the west.
- **Acushnet Heights:** Comprised mainly of census tract 13, this area is bordered by Maxfield Street to the south, Purchase St. to the east, Penniman St. to the north, and County St. to the west.
- **South Central:** Comprised primarily of census tract 19, this area is bordered by Potomska St. to the south, So. Second St. to the east, Walnut St. to the north, and County and Pleasant Sts. to the west.
- **South First.** Comprised mainly of census tract 26, this area is bordered by Cove Rd. and Grit St. to the south, Rodney French Blvd. and JFK Highway to the east, Potomska St. to the north, and County St. to the west.
- **Cove Street.** Including most of census tract 27 and a two-block area from census tract 26, this area is bordered by Mott St. to the south, E. Rodney French Blvd to the east, Cove St. to the north, and Brock Avenue to the west.

In each of these areas, a number of projects are underway intended to significantly improve conditions for neighborhood residents. In addition, several housing initiatives in the South Central, South End, and Cove Street areas [as well as in the downtown commercial area] have been completed over the past 24 months. Also of particular note is the HUD designation of The Acushnet Heights Neighborhood in July 2000 as a Neighborhood Revitalization Strategy Area. With the assistance of this designation, programs and initiatives are ongoing to improve the quality of life in this neighborhood.

Whether it is through rehabilitation or economic development, the City's revitalization efforts continue to change the face of New Bedford's neighborhoods and increase the rate of home ownership in these areas, particularly for persons of low-to-moderate income effectively tearing down those barriers—both perceived and real—to fair housing choice.

The Transportation Linkage between Housing and Employment

As is oftentimes the case with considering neighborhood revitalization in the context of impediments to fair housing choice, it is easy to initially discount the importance of transportation in fairly accessing housing. By recognizing the preeminent role public transportation plays in connecting a potential homeowner or renter to employment and services begins to illustrate the extent to which it can become an impediment.

The Southeastern Regional Transit Authority (SRTA) serves the cities of Fall River and New Bedford and surrounding towns on a far more limited scale¹. SRTA is one of two public regional transit authorities located within the Southeastern Regional Planning and Economic Development District (SRPEDD) Regional Planning Area. The population of the SRTA area is over 300,000 with a concentration of almost 200,000 persons within the two cities, alone.

With the decline of two of the traditional industries of the region—textiles and fishing—New Bedford has consistently had higher unemployment and a higher percentage of households below the poverty level as compared with both state and national levels. As further elaborated upon in Section C of this report, while the unemployment rate for the state has historically fallen below national and local levels, New Bedford’s unemployment continues to rise several percentage points above both national and state levels, often having the highest unemployment rate in the Commonwealth.

Access to employment takes on a particularly significant meaning in New Bedford, then, amidst its struggle to connect its workforce with viable employment. Welfare to Work legislation and impediments relating to transportation highlight this struggle and are discussed further in this section.

1. The Significance of Welfare to Work.

In 1996, Congress passed and President Clinton signed into law a massive overhaul of the national welfare system. This *Bill of Rights in Action* focused on welfare and led to the creation of a new program intended to help states achieve their own welfare reform objectives. Designed to help families for whom the lack of stable, affordable housing is a barrier to employment, the Welfare-to-Work Voucher Program provided 50,000 Section 8 housing vouchers to families attempting to make the transition from welfare to work. These vouchers were used to help families move to areas with better job opportunities or transportation networks or to provide incentives for families on welfare to secure and retain employment.

¹ Swansea, Somerset, Freetown, Westport, Dartmouth, Acushnet, Fairhaven and Mattapoissett

In conjunction with state and local welfare agencies and local entities administering Department of Labor (DOL) welfare-to-work grants, public housing agencies like the New Bedford Housing Authority compete for the vouchers in a competition administered by the U.S. Department of Housing and Urban Development (HUD). Winners of the competition receive an allocation of new Section 8 housing vouchers, which will carry the standard administrative fee. The legislation was intended to provide applicants with substantial flexibility to design programs that meet local needs and support local welfare reform strategies.

As a result of this welfare reform legislation, local agencies and offices have been collaboratively working to develop and institute strategies to minimize and eliminate barriers to employment including a strong focus on transportation needs within the community. First convened in April of 1998, the Greater New Bedford Regional Employment Board hosted a meeting to discuss regional transportation needs. Representatives from the field workforce development, school-to-work training, community development, human services, Department of Employment and Training, Department of Transitional Assistance, SRTA and the Southeastern Regional Planning and Economic Development District [SRPEDD] were present. Once the Workforce Investment Act came to fruition in the New Bedford area, the Regional Employment Board became the area's Workforce Investment Board [WIB].

Welfare to Work legislation is intended to move people from welfare to work, ultimately increasing employment among welfare recipients¹ and empowering individuals and families to financially stabilize their lives while opening new possibilities for safe, decent, affordable housing. Unfortunately making the connection between housing and employment and service centers has proven a tremendous task, complicated by an overwhelming matrix of multiple employment and service opportunities, geographic differences, cultural barriers, variances in employment scheduling, limitations of the existing transportation network, and language barriers. This series of impediments connecting employment and housing is at the forefront of the Workforce Investment Board's [and their Access Advisory Pane and Youth Council Subcommittee's] agenda.

2. Transportation Impediments.

These groups are comprised of representatives from a broad swath of social and public service agencies. Identifying transportation barriers and solutions has involved the collaborative effort of the Workforce Investment Board, New Bedford Economic Development Council, Immigrants Assistance Center, a wide

¹ The goal of increasing employment among welfare recipients has, itself, been a source of great debate particularly related to single mothers and the corresponding demand for affordable, safe and accessible daycare.

range of Social Service Providers, the Industrial Park Foundation, the Commonwealth's Department of Transitional Assistance and its Department of Workforce Development, along with SRTA to name a few.

Although there is no longer a transportation coordinator working with SRTA and the regional DTA offices/clients as had been the case in the late 1990's, the Workforce Investment Board's Access Advisory Panel and Youth Council Subcommittee continue to work on this issue. In New Bedford, key transportation-based impediments to employment, and by default, housing, are:

- Lack of Education and Outreach. Many potential transit users have no idea as to the kinds of public transportation that is available to them, its extent and its geographic region. Compounding this is the reality that most agency representatives that work with potential transit users, whether in an employment counseling, training, human services or other capacities, are also unaware of existing transportation services and are therefore unable to help their clients gain access to jobs they may be seeking.
- Employment Scheduling Conflicts. SRTA's transportation system is designed to accommodate traditional commuting hours while remaining wholly inaccessible for the current employment market in the region. Bus service is greatly reduced on the weekends and nonexistent in the evenings. When operating, most headways are fairly frequent at 30 minutes while inter-city travel that connects New Bedford with suburban centers have headways of an hour or greater making connections to areas beyond City boundaries far more difficult. A growing number of services and retail jobs require workers to take odd shifts that do not necessarily correspond to traditional transit operating hours. Many of these positions that are not well served by existing transit services require employees to work weekends and holidays in addition to "off-hours" during the week. For those returning to the workforce and seeking an entry-level job, finding employment opportunities in industries that operate around the clock and seek second and third shift labor is not uncommon.
- Location, location, location. Jobs are increasingly being located outside the urban area and beyond the geopolitical boundaries of New Bedford making it more difficult for traditional fixed public bus routes to provide adequate services they need. Sprawling industrial and commercial development in neighboring Dartmouth has opened up new jobs in low-density areas for many who remain in affordable housing in New Bedford, compounding SRTA's ability to provide public transit service at a reasonable cost.

The Workforce Investment Board's Access Advisory Panel and Youth Council Subcommittee continue to meet on a quarterly basis to collaborate on these issues, working toward creative, sustainable and cost-efficient solutions. SRTA continues to initiate improvements in their system to better accommodate its ridership including an extensive and expensive brokered system utilizing taxicabs and using vanpooling to move people to major employment and service centers are located.

B. Private Sector

One must consider the role of the public sector in accessing fair housing. In addition to exploring and understanding public sector pieces of impeding or facilitating fair housing choice for all persons. To this end, this section primarily focuses on the activities of the lending community in private banking while touching upon real estate sales.

1. Lending Policies and Practices

The first step in analyzing the operations of private market forces in the City of New Bedford involves a review of home mortgage lending practices. Pursuant to the Home Mortgage Disclosure Act (HMDA), every financial lending institution is required to provide the federal government with a range of information regarding their lending practices. Included among the data are categorizations of loan applications, originations and denials by race and Census Tracts where the loans were made. HMDA data was utilized to compile all housing statistical data for the following information:

Regional and City Comparisons

The initial stage of analysis compares the home purchase lending patterns in both the City of New Bedford and the New Bedford metropolitan statistical area (MSA).¹

For purposes of this analysis, "home purchase loans" and "home purchase lending" are defined as mortgage lending for the buying of owner-occupied residential dwellings with between 1 – 4 units. Home purchase loans generally fall into two different categories: 1) Conventional loans and 2) Federal Housing Administration (FHA) or Veteran's Assistance (VA) loans which generally benefit low and moderate income borrowers by providing for mortgage insurance and allowing lower down payments.

¹ The 2003 New Bedford MSA included New Bedford along with the surrounding towns of Acushnet, Dartmouth, Fairhaven, Freetown, Marion, Mattapoisett and Rochester. The 2004 New Bedford MSA was adjusted, however, resulting in the expansion of this area to include the entirety of the State of Rhode Island and all of Bristol County in Massachusetts. Because of the change in these MSAs during this period, one's ability to render an accurate comparison between these two years is significantly compromised.

According to 2000 Census data estimates, the New Bedford MSA contains a total population of 175,198. The City of New Bedford, with a population of 93,768, accounts for 54% of the New Bedford MSA population. However, only 3718 out of 7342 (50 %) of the home purchase loans originated by regional lenders in the New Bedford MSA are located within the City of New Bedford. This disparity suggests evidence of market disinvestments in the City of New Bedford.

From the charts in Figure E-3, it also becomes clear that the City has a lower overall loan origination rate than the rest of the region (72.2 % vs. 78%) while still having a far higher denial rate (12.5% to 7.3%). Though there are many factors that could trigger such a discrepancy, such as lower household incomes or a history of declining property values in New Bedford, the disproportionate rate of lending and a significantly higher denial rate both indicate potential mortgage disinvestments in the City.

Home Purchase Loans in the New Bedford MSA					Home Purchase Loans in the New Bedford MSA by Lenders in the New Bedford MSA				
Year	Category	FHA/VA Loans	Conventional Loans	Total Loans	Year	Category	FHA/VA Loans	Conventional Loans	Total Loans
2001	Applications	563	2414	2977	2001	Applications	368	11432	1511
	Loan Originations	461	1869	2330		Loan Originations	303	834	1137
	Origination Rate	82%	77.4%	78.3%		Origination Rate	82%	73%	75%
	Loan Denials	47	193	240		Loan Denials	30	132	162
	Denial Rate	8.3%	8%	8.1%		Denial Rate	8.2%	11.5%	10.7%
2002	Applications	460	2850	3310	2002	Applications	339	1429	1768
	Loan Originations	367	2104	2471		Loan Originations	267	1001	1268
	Origination Rate	79.8%	74%	75%		Origination Rate	79%	70%	72%
	Loan Denials	43	281	324		Loan Denials	33	176	209
	Denial Rate	9.3%	10%	9.8%		Denial Rate	9.3%	10%	9.8%
2003	Applications	425	3081	3506	2003	Applications	317	1552	1869
	Loan Originations	329	2212	2541		Loan Originations	243	1070	1313
	Origination Rate	77.4%	71.8%	72.5%		Origination Rate	76.7%	69%	70.3%
	Loan Denials	47	375	422		Loan Denials	39	235	274
	Denial Rate	11%	12%	12%		Denial Rate	12.3%	15%	14.7%
Totals	Applications	1448	8345	9793	Totals	Applications	1024	4124	5148
	Loan Originations	1157	6185	7342		Loan Originations	803	2905	3718
	Origination Rate	79.9%	74.1%	75%		Origination Rate	79.4%	70.4%	72.2%
	Loan Denials	137	849	986		Loan Denials	102	543	645
	Denial Rate	9.46%	10.2%	10%		Denial Rate	9.96%	13.16%	12.53%

Figure: E-3: Home Purchase Loans Comparisons
Source: Home Mortgage Disclosure Act [HMDA] data 2006

Comparing Home Purchase Loans by Location				
Year	Category	FHA/VA Loans	Conventional Loans	Total Loans
Home Purchase Loans within the New Bedford MSA except the City of New Bedford				
2001 through 2003	Applications	424	4,221	4,645
	Loan Originations	344	3,280	3,624
	Origination Rate	81.1%	77.7%	78%
	Loan Denials	35	306	341
	Denial Rate	8.3%	7.2%	7.3%
Home Purchase Loans in the City of New Bedford, only				
2001 through 2003	Applications	1024	4,124	5148
	Loan Originations	813	2,905	3718
	Origination Rate	79.4%	70.4%	72.2%
	Loan Denials	102	543	645
	Denial Rate	10%	13.2%	12.5%

Figure: E-4 : Comparing Home Purchase Loans by Location
Source: Home Mortgage Disclosure Act data.2006

Relying on the 2006 HMDA data for both the City of New Bedford and the New Bedford MSA as presented in these three charts, it can also be understood that although the number of applications for home purchase loans in the New Bedford MSA has increased by over 500 applications between 2001 and 2003, the origination rates of home purchase loans in the New Bedford MSA have actually decreased each year since 2001, falling from just over 78% down to less than 73%.

Loans originated through New Bedford lenders between 2001 and 2003 represented over half of all such loan originations throughout the MSA yet its almost 13% rate of denials far exceeded loans made in other areas of the MSA [just over 7%].

Racial Comparisons

As articulated in figures E-5 and E-6, based on 2000 U.S. Census data, the minority population in the New Bedford MSA totaling 23,485 persons accounts for 13.4% of the 175,207 total population within the MSA while the white population [86.8%] represents the balance of the population. Minorities, however, only account for 11.4% of the owner-occupied housing within the City of New Bedford while whites account for the 88.6% balance of owner-occupied housing.

Although the minority population in the New Bedford MSA accounts for over 13% of the overall population¹, it accounts for a loan origination rate of only 67% [compared with over 78% among whites] between 2001 and 2003 while at the same time is burdened by an exceptionally high denial rate in excess of 15% that is nearly double the denial rate in the same area for the white population [8.5%].

City of New Bedford Housing Profile for Owner-Occupied		
Householder	# Owner Occupied	Percentage
White Alone	14811	88.6%
Black/Af. Amer. Alone	388	2.3%
Amer. Indian/Alaska Nat. Alone	44	.3%
Asian Alone	64	.4%
Native Hawaiian/Pac Isl. Alone	11	.1%
Other Race	713	4.3%
Two or More Races	693	4.1%
Minority	1913	11.4%
Total Units	16724	100%

Figure: E-5: New Bedford Owner-Occupied Racial Profile
Source: U.S. Census Value and Tenure by Race

Race and Home Purchase Loans 2001-2003 [FHA and Conventional Loans] in the New Bedford MSA					
Race	Applicants	Originations	Origination Rate	Denials	Denial Rate
American Indian/Alaskan Native	9	7	77.9%	1	11%
Asian/Pacific Islander	77	52	67.5%	8	10.4%
Black	303	205	67.7%	46	15.2%
Hispanic	361	243	67.3%	58	16.1%
White	7,520	5,889	78.3%	639	8.5%
Other	186	123	66.1%	30	16%
Race Not Availability	1,162	694	59.7%	179	15.4%
Minority Sub-Total	936	630	67.3%	143	15.3%
Minority % of Total	9.7%	8.7%		14.9%	
Total	9,618	7,213		961	10%

Figure: E-6 : New Bedford MSA Home Loans by Race
Source: U.S. Census Value and Tenure by Race

¹ According to the 2000 U.S. Census, minorities represent just over 21% of the total population in the City of New Bedford.

Analysis of Potential Lending Discrimination in the Region Based on Race, Alone

The data presented in the preceding two charts draws some concern over the lending practices of regional institutions. First, despite making up over 13 % of the population, only 9.7% of the home purchase loan applications were made by minorities. Of those minorities, Hispanics [5.9% of the MSA's population] have the lowest origination rate [67.3%] yet have the highest denial rate [16%]. The black population, [2.4% of the MSA's population] accounted for only 2.1 % of all loan originations and yet suffered 4.7% of all loan denials.

At the very least, these figures indicate a need for better marketing to the region's minority communities. However, at the very worst, this data demonstrates possible racial discrimination with respect to the overall minority population, particularly Hispanic and Black communities. While white applicants were denied less than 9% of the time, minorities were denied over 15% of the time and experienced far more difficulty in obtaining loans. Only 67.3 % of the overall minority population is successful, with Blacks (67.7%), Asians [67.5%] and Hispanics (67.3%) having the least success in obtaining loans. Minorities were more than three times more likely than Whites to be denied for a loan in the New Bedford MSA between the period 2001-2003.

New Bedford-Based Banks and the Racial Characteristics of New Bedford's Neighborhoods

Another aid in determining New Bedford-based banks minority lending practices is to examine in what parts of the City home purchase loans are being made. Figure E-7 [split between two consecutive pages on the following pages] presents an overall picture of housing loan activity in 2003 related to the minority population of each Census Tract. [Note: Figure E-9 offers a detailed picture of this loan activity in each of the 28 Census Tracts by lender and is discussed further in a later section of this Analysis.]

The total number of applications City-wide for home purchase loans from New Bedford-based institutions in 2003 was 279 with a loan origination rate of just over 82%. Interestingly, the data in Figure E-7 describing loan rates for minorities by census tract actually shows that with few exceptions¹, those neighborhoods whose population includes 10-19% minority households generally have better loan origination rates averaging almost 90% as compared with census tracts with populations comprised of less than 10% minorities (83.72 % loan origination rate). However, although five census tracts with minority populations of over 20% exceeded the city-wide loan origination rate, the vast majority of the City's census tracts [14] fared lower than the city-wide average. Such data suggests, then, that there is a strong correlation between lower origination rates and neighborhoods with larger numbers of minority households.

¹ Census tract 12 actually reported 0 applications for loans during 2003 and census tracts 25 and 18 only reported 1 application.

Similarly, those census tracts with between 20 – 50% minority populations suffered a far higher denial rate [almost 11%] with their loan applications than did those tracts with minority populations under 20% [2.33% and 2.13%].¹

Total Home Purchase Loans for New Bedford Lending Institutions							Demographic Data		
	Applications	W/drawn, Incomplete, Purchased, App not Accepted	Originations	Origination Rate	Denials	Denial Rate	# of Households	% Low-Mod Income	% Poverty
Census Tracts with less than 10% Minority Population									
1.01	22	2	19	86.36%	1	4.50%	1906	37.72%	5.15%
28	16	2	14	87.50%	0	0	1347	41.61%	6.04%
22	15	3	12	80.00%	0	0	1132	28.81%	3.61%
2.01	6	0	5	83.33%	1	16.66%	1162	61.93%	7.24%
2.02	9	2	7	77.77%	0	0	853	46.75%	7.24%
3	14	2	12	85.71%	0	0	1522	52.31%	7.47%
5	4	1	3	75.00%	0	0	13379	62.14%	11.58%
Sub Total	86	12	72	83.72%	2	2.33%	21301		
Census Tracts with between 10% - 19% Minority Population									
4	10	2	8	80.00%	0	0	1559	60.46%	20.58%
24	6	1	4	66.67%	1	16.67%	1111	58.65%	10.29%
21	13	1	12	92.30%	0	0	1146	50.28%	10.62%
6	7	0	7	100.00%	0	0	1008	72.23%	28.86%
10.01	11	0	11	100.00%	0	0	1067	50.20%	14.28%
Sub Total	47	4	42	89.36%	1	2.13%	5891		

Chart continued on following page.

Figure: E-7: New Bedford Home Loans by Percentage of Minority Population
Source: Home Mortgage Disclosure Act Data 2003

¹ The two census tracts with greater than 50% minority populations—17 and 19—did not have any denials; however this 0% denial rate may be skewed in light of the relatively low number of applications to begin with.

Total Home Purchase Loans for New Bedford Lending Institutions, Cont'd.							Demographic Data		
	Applications	W/drawn, Incomplete, Purchased, App not Accepted	Originations	Origination Rate	Denials	Denial Rate	# of Households	% Low-Mod Income	% Poverty
Census Tracts with between 20 - 50% Minority Population									
23	2	0	2	100.00%	0	0	1221	58.17%	17.14%
25	1	0	1	10.00%	0	0	1038	75.25%	28.46%
8	9	0	7	77.77%	2	22.22%	1526	52.31%	30.29%
1.02	30	2	26	86.66%	2	6.67%	1846	51.26%	19.42%
27	4	1	3	75.00%	0	0	1539	73.25%	32.99%
11	9	1	7	77.77%	1	11.11%	1651	71.16%	27.49%
10.02	13	0	10	76.92%	3	23.07%	1514	58.80%	23.30%
16	21	2	16	76.19%	3	14.28%	1569	63.82%	12.58%
20	7	1	5	71.43%	1	14.28%	1141	85.40%	12.81%
18	1	0	1	100.00%	0	0	1224	38.15%	37.46%
14	11	3	7	63.64%	1	9.10%	1219	61.94%	18.27%
13	5	0	5	100.00%	0	0	867	72.34%	27.71%
7	3	0	3	100.00%	0	0	944	71.73%	35.37%
12	0	0	0	0	0	0	694	81.48%	48.77%
26	4	0	3	75.00%	1	25.00%	1003	78.46%	40.40%
9	4	1	3	75.00%	0	0	1141	82.00%	35.63%
15	13	2	10	76.92%	1	7.69%	1183	64.24%	21.56%
Sub Total	137	13	109	79.56%	15	10.94%	21320		
Census Tracts greater than 50% Minority Population									
17	5	1	4	80.00%	0	0	959	74.80%	26.63%
19	4	1	3	75.00%	0	0	771	84.62%	32.16%
Sub Total	9	2	7	77.77%	0	0	1730		
TOTALS	279	31	230	82.44%	18	6.45%			

Figure: E-7: New Bedford Home Loans by Percentage of Minority Population
Source: Home Mortgage Disclosure Act Data 2003

Although this chart provides information that demonstrates a correlation between lower loan originations in areas with greater concentrations of minority populations, ironically it also reveals that loans were actually originated at a higher rate per household in areas with slightly higher minority concentrations. For example: in tracts where the minority populations were under 10%, loans were given at a pace of .0033 per household. In the 10-19% minority tract, the pace increased to .0071. Where the minority population was 20 – 50%, the loan ratio was .0051.

New Bedford-Based Banks and the Economic and Racial Characteristics of New Bedford's Neighborhoods.

Some may argue that predictors of limited lending in certain Census Tracts rests less with race and more with an area's economic circumstances. In order to test this theory, an examination of the HMDA data was performed utilizing poverty rates and the percentage of low and moderate-income persons living in each New Bedford census tract. If lower origination rates were tied to economic conditions rather than race, one would expect to see similar income census tracts with comparable origination and denial rates regardless of race. The results of this examination can be found in working with Figures E-7 and E-8.

A cursory look at the level of loans originated in 2003 by New Bedford based lenders by census tract [Figure E-8] helps one lean toward an understanding that the extent to which poverty is prevalent in a census tract bears a somewhat greater correlation to loan origination levels than does minority concentration. This is evident when comparing the number of loans issued by New Bedford lenders for home purchases against poverty in each census tract. The first grouping of census tracts in Figure E-8 depicts the three poorest neighborhoods in the City based on poverty rates: census tracts #12, 26 and 18 each with poverty rates in excess of 36%. Based on lending history in 2003, those top three only average 1.3 loans per census tract. This compares with the next grouping of 10 census tracts with poverty rates approximately 25% – 35% but with loans increasing to an average of 4.4 per tract. The most significant comparison is in considering those census tracts with poverty rates below 25% but with rates averaging over 10 loans per census tract—a marked difference between those disadvantaged census tracts with high poverty.

This isn't to say that one cannot draw a correlation between low loan originations and high denials with the presence of increased minority populations. It stands to reason that because a statistical line can be drawn between the two indices—that is, poverty and minority population—one can reasonably assume that minority populations are significantly effected by impediments to relatively the same extent as those effecting households burdened by poverty.

Realistically however, because so few home purchase loans were issued in these particular census tracts, significant, reliable comparative analysis cannot be made. As such, it is important to understand the complexity inherent in analyzing such statistical tables and the biases that can result. For example, census tract 12 has the highest percentage of poverty and one of the highest percentages of low-mod income residents [81.2%] in New Bedford in addition to having the sixth highest minority population. In the case of this neighborhood, however, there were no applications for home purchase loans to New Bedford lending institutions in the three years depicted in Figure E-7 and thus, there are no loan originations and subsequently no denials. As a result, one could take this data and mistakenly suggest that even those

census tracts with tremendous poverty and high minority populations have few, if any denials. The question here, instead, should focus on the extent to which those populations had fair access to the application process and the impediments they faced that significantly diminished their interest in/ability to apply for home loans in comparison with other City neighborhoods having lower poverty rates and less minority households.

2003 Home Purchase Loans Originated by New Bedford Banks												
Census Tract	Poverty %	Minority %	New Bedford Credit Union	St. Anne's	First Citizens' Credit Union	First Federal Savings Bank	Luzo Community Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
12	48.8	43.4				*		*		*	**	**
26	40.4	45.4		*	*	1	*	*	**	2	***	**
18	37.5	35.3	**	**	*	1	*		*			*
9	35.6	47.7		1	1	*			*	*	2	**
7	35.4	37.1			*	*		1	*	1	*	1
27	33.0	27.0	*	*	*	**	*	1	*	*	***	2
19	32.2	70.2	*	*	1	*			*		*	*
8	30.3	22.1		*	1	2			*	2	1	1
6	28.9	16.3		*		*		*		2	2	3
25	28.5	20.5	*	*		**	*	*	*		1	*
13	27.7	36.6	*	**	*	**	*	*	*	1	1	3
11	27.5	27.0	**	1	1	2	1	*	**	2	***	1
17	26.6	57.6	*	*	1	1		*	*	1	*	2
10.2	23.3	30.4	1	1	2	1		1	**	*	1	3
15	21.6	49.2	*	1	1	2	*	*	*	1	4	1
4	20.6	12.5	*	1	1	1	1	*	*	1	4	**
1.2	19.4	22.6	*	1	2	3	*	*	1	1	6	12
14	18.3	35.9	**	1	1	1	*	**	*	3	***	1
23	17.1	20.4	*	1	1	1	*		**	*	***	**
10.1	14.3	19.0	1	1	*	3		**	*	*	1	5

Chart and explanatory notes continued on following page.

Figure: E-8: 2003 Home Purchase Loans by New Bedford Based Banks
Source: HMDA data.2003

Analysis of Impediments Report

City of New Bedford, Massachusetts

2003 Home Purchase Loans Originated by New Bedford Banks, Continued												
Census Tract	Poverty %	Minority %	New Bedford Credit Union	St. Anne's	First Citizens' Credit Union	First Federal Savings Bank	Luzo Community Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
20	12.8	31.5	*	1		1	*	**	*	2	1	2
16	12.6	31.1	3	**	2	4			**	1	2	4
5	11.6	8.2	*	**	*	1	1		**	*	**	1
21	10.7	15.7	*	2	1	4		*	**	1	2	2
24	10.3	14.2		*		2		*	*	*	***	1
3	7.5	7.6	1	1	2	2	*	1	**	2	1	1
2.1	7.2	7.5	2	1	*	3		*	**	***	1	2
2.2	7.2	7.5	*	*	*	***		*	**	*	1	4
28	6.0	5.9	**	2	1	3	*	*	1	1	3	3
1.1	5.2	5.9	1	***	2	2	*	**	***	**	5	9
22	3.6	7.5	**	2	3	3		*	***	***	2	3
TOTAL: 246			9	18	24	44	3	4	2	24	51	67

Figure: E-8: 2003 Residential Lending by New Bedford Based Banks
Source: HMDA data.2003

Notes:

- * No Home Purchase Loans were made, but the bank made up to 4 home improvement, refinancing or multi-family loans made in that tract.
- ** No Home Purchase Loans were made, but the bank made 5 - 9 home improvement, refinancing or multi-family loans in that tract.
- *** No Home Purchase Loans were made, but the bank made 10 or more home improvement, refinancing or multi-family loans in that tract.

Overall Institutional Lending Patterns of New Bedford Based Banks

One can further the discussion of lending practices in light of racial and economic characteristics within New Bedford's neighborhoods by next considering local lender activities related to home purchase loans as well as other home loans [home improvement, refinancing and multi-family home purchases].

Analysis of Impediments Report

City of New Bedford, Massachusetts

There were 501 home purchase loans and 4,863 home improvement, multi family or refinancing loans made by City lenders in the New Bedford MSA* in 2003 for a total of 5,364 locally originated loans. Figures E-9 and E-10 demonstrate that Fleet Bank originated 1260 of those loans accounting for 23% of the total loans. The other top two lenders locally were Compass Bank and First Fed with 19% and 18% of the loan originations, respectively. Of the remaining seven lenders, St. Anne's Credit Union originated 12.5% of all local home loans while each of the remaining lenders on average controlled less than 5 % of the market.

Although there were over 5,000 such loans originated in 2003 in the MSA, Figures E-9 and E-10 show that only 345 or 6.4% of the 5,364 home purchase, refinancing, home improvement and multi-family dwelling loans made by City-based lenders were actually made to minorities.

*** A note about MSA figures...**

The New Bedford MSA or "Metropolitan Statistical Area" includes several communities in the Greater New Bedford area in addition to the City, itself. Figures available through the Home Mortgage Disclosure Act are sometimes available for just the City of New Bedford, yet in other instances, is only available for the entire New Bedford MSA.

As a result it becomes difficult to draw first generation statistical analysis as the reported areas are geographically not comparable. Whenever possible this report strives to account for such discrepancy and clarify for the reader where such differences exist and how they are being accommodated within the analytical narrative.

While it is understood that variations in minority and poverty conditions exist between the City of New Bedford and the surrounding communities that comprise its MSA, the ratio of 54% [reflective of the proportion of New Bedford residents to the overall MSA population] is often used in understanding the fuller picture of loan originations and denials in the City, itself.

Figures E-9 and E-10 [spread out over the following four pages] provide greater information on these figures, offering data on applicants, loan originations and denial rates for all home-related loans made by New Bedford-based lenders to those living within the New Bedford MSA in 2003.

Race of Home Purchase Loans in the New Bedford MSA by New Bedford Based Banks										
2003	New Bedford Credit Union	St. Anne's Credit Union	First Citizens' Credit Union	First Federal Savings Bank	Luzo Comnty. Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
Race of Applicants										
Amer Indian / Alaskan Native	0	0	0	0	0	0	0	0	1	0
Asian/Pac. Islander	0	0	0	1	0	0	1	0	0	2
Black	0	1	1	2	0	0	0	2	1	2
Hispanic	0	1	0	1	0	0	0	4	2	4
White	15	82	49	110	8	22	7	40	13	174
Other	1	2	4	3	0	0	0	2	0	2
Joint [white & minority]	0	2	1	2	0	0	0	0	0	3
Info Not Provided	0	0	9	0	0	0	2	2	2	6
Total	16	88	64	119	8	22	10	50	19	193
Race of Successful Loan Originations										
Amer Indian / Alaskan Native	0	0	0	0	0	0	0	0	1	0
Asian/Pac. Islander	0	0	0	1	0	0	1	0	0	2
Black	0	1	1	2	0	0	0	2	1	2
Hispanic	0	1	0	1	0	0	0	3	2	3
White	14	62	48	87	8	20	2	33	10	158
Other	1	1	3	3	0	0	0	2	0	1
Joint [white & minority]	0	2	1	2	0	0	0	0	0	3
Info Not Provided	0	0	7	0	0	0	1	1	1	6
Total	15	67	60	96	8	20	4	41	15	175

Figure: E-9 New Bedford Home Loans by Race given by New Bedford-based banks
Source: Home Mortgage Disclosure Act Data 2003

Race of Home Purchase Loans in the New Bedford MSA by New Bedford Based Banks, Continued										
2003	New Bedford Credit Union	St. Anne's Credit Union	First Citizens' Credit Union	First Federal Savings Bank	Luzo Comnty. Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
Race of Denials										
Amer Indian / Alaskan Native	0	0	0	0	0	0	0	0	0	0
Asian/Pac. Islander	0	0	0	0	0	0	0	0	1	0
Black	0	0	0	0	0	0	0	0	1	0
Hispanic	0	0	0	0	0	0	0	1	0	0
White	0	4	0	7	0	1	3	2	12	4
Other	0	1	0	0	0	0	0	0	1	0
Joint [white & minority]	0	0	0	0	0	0	0	0	0	0
Not Available	0	0	1	0	0	0	0	0	2	0
Total	0	5	1	7	0	1	3	3	17	4
Loan Origination %										
Amer Indian / Alaskan Native	0	0	0	0	0	0	0	0	100%	0
Asian/Pac. Islander	0	0	0	100%	0	0	100%	0	0	100%
Black	0	100%	100%	100%	0	0	0	100%	100%	100%
Hispanic	0	100%	0	100%	0	0	0	75%	100%	75%
White	93.33%	75.61%	97.95%	79.09%	100%	90.90%	28.57%	82.50%	76.92%	90.80%
Other	100%	50%	50%	100%	0	0	0	100%	0	50%
Joint [white & minority]	0	100%	100%	100%	0	0	0	0	0	100%
Not Available	0	0	77.78%	0	0	0	50%	50%	50%	100%
Total	93.75%	76.13%	93.75%	80.67%	100%	90.90%	40%	82%	78.94%	90.67%

Figure: E-9 New Bedford Home Loans by Race given by New Bedford-based banks, Continued
Source: Home Mortgage Disclosure Act Data 2003

Race of Applicants Refinancing, Seeking Home Improvement, or Multi-Family Dwelling Loans in the New Bedford MSA from New Bedford-Based Banks										
2003	New Bedford Credit Union	St. Anne's Credit Union	First Citizens' Credit Union	First Federal Savings Bank	Luzo Comnty. Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
Race of Applicants										
Amer Indian / Alaskan Native	0	0	0	1	0	1	4	0	6	0
Asian/Pac. Islander	0	1	0	0	0	0	9	0	19	2
Black	9	24	2	9	0	1	20	12	23	13
Hispanic	2	7	2	4	0	1	14	14	33	15
White	122	634	66	949	33	189	703	306	1374	905
Other	7	2	3	6	1	3	11	9	43	29
Joint [white + minority]	2	10	2	7	0	0	12	8	26	6
Not Available	0	0	27	19	0	7	195	20	139	19
Total	142	678	102	995	34	202	968	369	1663	989
Race of Successful Loan Originations										
Amer Indian / Alaskan Native	0	0	0	0	0	0	1	0	5	0
Asian/Pac. Islander	0	1	0	0	0	0	6	0	14	2
Black	9	23	2	7	0	1	7	7	12	11
Hispanic	1	6	2	3	0	0	8	5	22	12
White	119	563	61	857	32	153	416	241	1059	791
Other	7	2	3	6	1	3	4	6	31	21
Joint [white + minority]	2	10	2	3	0	0	4	5	19	6
Not Available	0	0	24	16	0	7	111	12	83	16
Total	138	605	94	892	33	164	557	276	1245	859

Figure: E-10: Race of Applicants Refinancing, Seeking Home Improvement, or seeking Multi-Family Dwelling Loans in the City of New Bedford from New Bedford-Based Banks

Source: Home Mortgage Disclosure Data 2003

Race of Applicants Refinancing, Seeking Home Improvement, or Multi-Family Dwelling Loans in the New Bedford MSA from New Bedford-Based Banks , Continued										
2003	New Bedford Credit Union	St. Anne's Credit Union	First Citizens' Credit Union	First Federal Savings Bank	Luzo Comnty. Bank	Slade's Ferry Bank	Citizens Bank	Sovereign Bank	Fleet National Bank	Compass Bank
Race of Denials										
Amer Indian / Alaskan Native	0	0	0	1	0	0	1	0	0	0
Asian/Pac. Islander	0	0	0	0	0	0	2	0	4	0
Black	0	0	0	1	0	0	12	4	10	0
Hispanic	0	0	0	1	0	0	6	6	11	2
White	1	17	0	21	1	24	198	29	207	22
Other	0	0	0	0	0	0	7	4	9	1
Joint [white + minority]	0	0	0	2	0	0	6	2	5	0
Not Available	0	0	1	1	0	0	56	3	31	0
Total	1	17	1	27	1	24	288	48	277	25
Loan Origination %										
Amer Indian / Alaskan Native	0	0	0	0	0	0	25%	0	83.33%	0
Asian/Pac. Islander	0	100%	0	0	0	0	66.67%	0	73.68%	100%
Black	100%	95.83%	100%	77.78%	0	100%	35%	58.33%	52.17%	84.61%
Hispanic	50%	85.71%	100%	75%	0	0	57.14%	35.71%	66.66%	80%
White	97.54%	88.80%	93.84%	90.30%	96.96%	80.95%	59.17%	78.75%	77.07%	87.40%
Other	100%	100%	100%	100%	100%	100%	36.36%	66.67%	72.09%	72.41%
Joint [white + minority]	100%	100%	100%	42.85%	0	0	33.33%	62.50%	73.07%	100%
Not Available	0	0	88.89%	84.21%	0	100%	56.92%	60%	59.71	84.21%
Total	97.18%	89.23%	93.06%	89.64%	97.05%	81.18%	57.54%	74.79%	74.86%	86.85%

Figure: E-10: Race of Applicants Refinancing, Seeking Home Improvement, or seeking Multi-Family Dwelling Loans in the City of New Bedford from New Bedford-Based Banks, Continued
Source: Home Mortgage Disclosure Data 2003

Thirty-five percent of all the loans made in the City were confined to just 6 census tracts, or 19% of the City's total 31 census tracts. All of these census tracts had minority populations less than 19 %. The highest percentage of loans given by these New Bedford based lenders was made in Census Tract 1.01, which has a minority population of only 5.9 % and a poverty rate of just 5.2%.

In examining New Bedford based lenders closer using data provided in Figure E-10, one finds that in 2003 two lenders, Luzo Community Bank and Slades Ferry both reported zero minority applicants for home purchase loans and two other lenders, the New Bedford Credit Union and Citizens Bank, reported only one minority applicant, each. Together these four lenders represented almost 10% of all home loan applicants in the MSA that year but cumulatively had less than half a percent [.0034] of the minority applicants in the MSA.

Fleet Bank, accounting for 24% of the of the loans made by New Bedford Institutions in 2003, had only 4 minorities apply for home purchase loans and 117 apply for other housing loans. While 100% of the minorities were successful in obtaining their home purchase loans, only 69% of the other housing loans were originated. Furthermore, less than half of all those who were Black were approved for loans and one third of the Hispanics applying for loans were similarly denied. Such denial rates disproportionately affect minorities in New Bedford and thereby impede this population's ability to access fair housing.

Of the ten New Bedford based institutions, Compass Bank represents the greatest amount of home purchase loans granted at 35% while First Federal Savings Bank came in second with 22%. When factoring in additional loans involving refinancing, home improvements or multi-family dwellings, Compass provided loans within every single City census tract, demonstrating its commitment to lend in all of the City's neighborhoods.¹ However, only 6.1% of Compass's 1,034 total home loans [175 home purchase and 859 other home loans] in the City of New Bedford were made to minorities. This rate was better than First Federal's showing of 2.8 %, but less than Fleet's rate of 8.5%. Given New Bedford's minority population of 21% and assuming these ratios are consistent between the MSA and City, alone, the loan portfolios of Compass, as well as First Federal and Fleet, need to be more ethnically diversified within the City of New Bedford.

¹ CompassBank was bought out in 2004 by Sovereign Bank.

All Home Loan Lending Activity of the Three Major New Bedford-Based Banks ¹				
Census Tract	Minority %	Number of Loans Made		
		First Federal	Fleet Bank	Compass
19	63.2 %	3	3	4
17	39.5 %	5	2	10
15	36.4 %	6	19	6
9	25.8 %	2	14	5
26	25.4 %	5	11	5
18	22.7 %	2	0	4
16	22.5 %	13	33	40
13	21.4 %	5	5	14
14	20.3 %	10	14	17
20	18.3 %	17	25	18
10.02	17.7 %	24	27	28
12	14.1 %	3	6	5
11	13.8 %	5	52	19
10.01	13.6 %	15	17	20
7	12.9 %	2	4	6
1.02	12.2 %	35	40	33
27	11.5 %	5	17	18
21	8.5 %	17	23	20
23	8.4 %	12	14	13
25	7.1 %	7	13	2
8	7.0 %	6	9	7
6	5.1 %	4	11	12
2.02	4.8 %	19	16	10
22	4.7 %	18	24	24
4	4.0 %	11	32	11
24	4.0 %	10	20	5
1.01	3.9 %	40	41	57
2.01	2.4 %	26	23	18
5	2.4 %	14	11	7
3	2.3 %	27	20	11
28	2.1 %	24	49	24
Totals*		392	656	473

Figure: E-11: Top Three Lenders' Home Loan Activities in 2003
Source: HMDA Data.2003

¹ The total number of loans made by all ten New Bedford-based lenders for both home purchase loans and refinancing, multi-family or home improvement loans is 5,364. The total loans originated by these three banks represents 28% of the overall loans for all New Bedford lenders [1,521].

2. Sales and Rental Practices

In their oath-taking, all members of the Greater New Bedford Board of Realtors vow to follow all federal and state laws governing housing including fair housing practices in all sales and rental transactions.

C. Public and Private Sector

1. Fair Housing Enforcement

The New Bedford Housing Authority

In their 5 year plan, the New Bedford Housing Authority states that they have examined its programs or proposed programs, identified any impediments to fair housing choice in those programs, addressed or is addressing those impediments in a reasonable fashion in view of the resources available to them. The NBHA is working with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the New Bedford Housing Authority's involvement.

The New Bedford Housing Authority, a member of the Continuum of Care, provides ongoing education and information, Section 8 counseling and a Homeownership Program for their tenants.

The City's Office of Housing and Community Development

The Office of Housing and Community Development [OHCD] serves as the local contact point for anyone seeking information on, or interested in filing a complaint relative to, fair housing. Through its website [www.ci.new-bedford.ma.us/ohdc.htm] the OHCD provides contact information for Spanish and Portuguese speaking persons along with basic facts about housing discrimination and fair housing issues, information about the multiple ways in which one may actually file a complaint, and contact/link information to HUD's regional Fair Housing and Equal Opportunity office, the Massachusetts Commission Against Discrimination and the Commonwealth's Housing Consumer Education Center website.

In addition to these resources, the City's OHCD affirmatively furthers fair housing through its own housing programs. Among these efforts is its "Neighborhood's First program" that includes training seminars and individual instruction to potential first time homebuyers. Over 250 persons annually attend one of the multiple First Time Homebuyer seminars offered through this effort throughout the course of the year.

These seminars cover topics such as planning for home ownership, home inspections, home maintenance, lead paint, the role of the lender, real estate broker, closing attorney, budget and credit issues, obtaining mortgage financing, the dangers of predatory lending, as well as other pertinent issues. The Homebuyer Counseling courses are certified with The Massachusetts Department of Housing and Community Development, Massachusetts Housing Finance Agency, Fannie Mae, Freddie Mac, Citizens Housing and Planning Association and the Massachusetts Home Ownership Collaborative. Bi-Lingual Home Buyer Counseling for Portuguese and Spanish citizens is also offered through a reciprocal agreement with Catholic Social Services, a social service agency that is also certified through the aforementioned state agencies to conduct homebuyer counseling.

In addition to these offerings, the City's OHCD has developed the Affirmative Marketing Policy in accordance with the regulations of the HOME Investment Partnership Program contained in 24 CFR Part 92.351. The City of New Bedford is committed to non-discrimination and equal opportunity in housing, and has established procedures to affirmatively market HOME assisted housing containing five (5) or more housing units intended to further the objectives of the Fair Housing Act and the Civil Rights Act of 1964.

The City's OHCD continues to promote and enforce Fair Housing laws through all of its activities, programs and initiatives. This policy reflects New Bedford's commitment that individuals of similar economic levels, in the same housing market, have the entire range of housing choices available regardless of race, color, religion, sex, national origin, marital status, handicap, and or family status.

The New Bedford Continuum of Care

The Homeless Service Provider's Network [HSPN], is the membership entity for the City of New Bedford's Continuum of Care. The HSPN enjoys a broad membership that includes homeless consumers, municipal departments, state human service agencies, developers, realtors, bankers and private interests in addition to many of the human service providers operating within the City. These providers have the capacity to offer a variety of services to their clients including fair housing advocacy, education and information.

This broad based HSPN membership includes:

- **American Red Cross** –provides disaster services, first aid, blood services, AIDS education, shelter for the homeless etc.

- **Catholic Social Services** – provides advocacy, financial assistance to prevent homelessness, such assistance includes rent payment to avoid eviction and utilities. As well as first rent payment and security to obtain housing.
- **Center for Health and Human Services** – provides adult aftercare (psychological support services) clinic, Aids prevention and education, children’s diagnostic safety education program, Home of Hope program for women, etc.
- **City of New Bedford Human Services Office** – provides advocacy, information and referral services to families and individuals etc.
- **Coastline Elderly Services** – provides elderly services such as a companion program, coordination of care (nursing home assistance), elderly at risk services, elderly nutrition, foster grandparent, information and referral, money management, protective services etc.
- **Community Care Services** – provides housing advocacy and housing search for families and individuals etc.
- **Greater New Bedford Realtor’s Association** - provides rental units and advocacy for families and individuals
- **Greater New Bedford’s Women’s Center** – provides shelter to battered women, counseling, information and referral and advocacy
- **HighPoint Treatment Center** – provides substance abuse and mental health services
- **Immigrants Assistance** – provides assistance to immigrants and non English speakers by easing linguistic, cultural, social and economic barriers, in order for clients to access their rightful services and benefit etc.
- **Market Ministries** – provides breakfast and supper seven days a week (and a noon meal 5 days a week), emergency shelter for persons who become homeless and assist in efforts toward permanent supportive housing
- **May Behavioral Institute** – provides community rehabilitative and support services
- **NBCOA/Harmony House** – provides a six month recovery home for men who are in recovery from substance abuse
- **NBCOA/Wrap House** provides transitional Supportive Housing program in a safe, structured alcohol and drug-free environment
- **PAACA (Positive Action against Chemical Addiction)** – provides counseling, advocacy, drug treatment and prevention services for youth and adults etc.
- **PACE (People Acting in Community Endeavors)** – provides fuel assistance, advocacy, counseling, housing search assistance etc.
- **Reflections** – provides a 19 bed transitional housing for men in recovery, advocacy and referral services

- **Steppingstone** – a 20 bed residential substance abuse program for women and pregnant women with infants
- **United Way of Greater New Bedford** –Raises money through corporate/personal donations and fundraisers that are distributed to various agencies and families in need etc.
- **Veterans Transitional House** – provides a safe, drug- alcohol free transitional housing environment to the City’s homeless men who have been referred by Service Providers in the New Bedford area
- **YWCA** – provides, through the Reunion House, a place for mothers in treatment for substance abuse to meet with their children, summer camp for girls, pap smear for women over forty w/out insurance, bereavement support group, after school day care etc.

It is estimated that upwards of 85 % of the agencies within this Continuum provide educational and/or information to clients in this community in addition to providing a wide range of housing services to those in greatest need.

2. **Community Survey**

An integral part of the Analysis of Impediments to Fair Housing Choice is to conduct a neighborhood public opinion survey as well as an opinion survey for the private sector. Involving neighborhood residents, service providers, landlords, realtors and developers in the analysis process is essential to broaden the understanding of the housing issues in the City of New Bedford. (Actual forms and tabulated results may be found in the Appendices to this report.)

The questionnaire was written to obtain critical information pertaining to housing impediments throughout the City of New Bedford and how these impediments affect our most vulnerable residents. The target population for the questionnaire was any person residing in the City of New Bedford or serving residents/potential city residents.

The questionnaire was administered in several different ways:

- Distribution through existing coalitions including the City’s Homeless Service Provider’s Network;
- Distribution to neighborhood groups and, in turn, residents;
- Distribution to City lenders, realtors and developers;
- Availability online through the City website and targeted emails to neighborhoods and lenders;
- Distribution to clients at the City’s First Time Homebuyer seminar

A total of sixty-four (64) questionnaires were completed and included in this report. The following groups submitted questionnaires:

- Homeowners –14
- Tenants – 24
- Homeless –1
- Potential New Bedford Resident - 8
- Services Providers-12
- Landlords – 1
- Other – 5.

On the consumer survey, 24 “head of households” were identified as male and 10 were identified as female. Although these questionnaires only represent a small portion of the total population (93,768) of the entire city, the results formed an overall view of the housing issues throughout the city.

Questionnaire Analysis: Service Providers, Landlords and Realtors

The completed questionnaire was analyzed through a tabulation of data. The content of the questionnaire consisted of general demographic information such as age, gender, housing type, status and tenure. The questionnaire also addressed the major issues related to homeowners, tenants, and the homeless and potential New Bedford residents. A separate questionnaire was developed specifically for Service Providers, Landlords, and Realtors.

Service providers, landlords and realtors who responded to the questionnaire stated that the biggest obstacles their clients faced in obtaining appropriate housing was: purchase/rental price, size of required down payment, size of monthly payment, and proximity to transportation. According to information provided by service providers and other responding agencies, insurance costs and the costs to construct multi-family units (including demolition of previous structures) are indicated as major impediments in the housing delivery system in the City of New Bedford.

According to HUD’s definition of Fair Housing impediments, discrimination plays a significant role in the response of 20% of the consumers who stated *yes* when they were asked if they experienced discrimination in trying to acquire housing, while 19% of the Service Providers who responded stated that their clients experienced discrimination while trying to acquire housing. The most documented type of discrimination reported by consumers and service providers was race and ethnicity and health or disability.

56% of service providers stated that their clients had a disability that affected their housing needs. Of those consumers who responded when asked if they requested or received accommodations, 25% of the

consumers stated that they had a disability that has negatively affected their ability to find housing; however, none of these respondents asked for accommodations from landlords.

Based on the information we received from service providers, there were at least 85 housing problems reported from January 2002 through December 2005. Financial assistance was listed as the most frequent service provided to consumers during that period. In addition, financial guidance and housing search and education on rights ranked next, followed by Section 8 guidance and assistance for language translation.

The questionnaire also revealed that the service providers received about 300 requests for affordable housing last year with 5 service providers indicating a backlog. When we asked consumers if they received assistance in the past or are they receiving assistance now, 45% of the consumers responded *yes* to the question. The types of assistance consumers reportedly received included fuel assistance, section 8, down payment, weatherization, rent subsidy.

On the issues related to the needs or services that should be addressed for consumers, service providers responded by saying that budgeting support and first time homebuyer programs are considered the most important, followed by credit card and checking account education. Of respondents who applied for loans, 44% were denied because of credit problems, not enough verifiable income, not enough cash and too much debt were key factors.

Questionnaire Analysis: Consumers

The completed questionnaire was analyzed through a tabulation of data. The content of the questionnaire consisted of general demographic information such as gender, housing type and financial status. The questionnaire also addressed the major issues related to homeowners, tenants and the homeless as well as potential New Bedford residents.

41% of consumers had incomes greater than \$66,850, representing the largest portion of consumers who responded to the questionnaire. Yet 21% of respondents (the second largest category) had less than \$35,450 in annual income.

According to the data received from consumers, 52% of respondents have lived in their homes or apartments for more than 5 years. Most homeowners (64%) have lived in their homes for more than 5 years, while tenants responses reflected a broader range of tenure in their apartments with 33% living in their apartments for over 5 years and another 33% living in their apartments for 1 to 3 years. Another 33% lived in their apartments for 3-5 years or less than 1 year.

The length of time it took homeowners to search for the current home averaged between one (1) month to over a year, while nearly half (45%) of tenants found apartments in less than 30 days and 83% found apartments within 6 months. Over half (51%) of consumers live in single-family homes, while 38% live in 2-3 family houses and 11% live in apartments.

At least 67% of the tenants stated that their current place of residence is the type of housing that they were looking for, while 33% of the tenants stated that their housing was not what they were seeking. All of the homeowners stated that the type of housing that they were currently living in was what they wanted. 45% (15) of the remaining respondents (tenants, potential New Bedford residents and homeless) stated that their current housing was *not* what they wanted.

When asked if they ever experienced any problems when being shown a particular housing that was for sale, 67% of the total number of respondents stated that they did not experience any problems, while 33% stated that they had experienced problems. Among the 17 respondents who experienced problems while being shown a house, 3 were shown a house/apartment in an affluent neighborhood, 11 (65%) were shown houses/apartments in poor neighborhoods and 3 (18%) had a realtor or landlord refused to show a particular house/ apartment.

The largest number of respondents (51%) stated that they located their current residence through word of mouth, friends or family while the second largest number of respondents (21%) stated that they located their current residence through the newspaper/advertising.

When asked what would have made their housing search easier, the tenants responded with the following:

- more affordable rents;
- handicapped accessible apartments;
- assistance for rent deposit and first and last month's rent (this response was from a homeless individual); and
- a listing on the internet.

None of the homeowners stated thoughts about how their search could have been easier.

63% (15) percent of the tenants who responded stated that they had to provide first month's rent. 47% provided last month's rent, 47% provided a security deposit, 17% signed a lease and 29% were asked for references.

Out of the 30 tenants who responded when asked if they requested a payment plan, 10 (42%) stated that they did not inquire, 3 stated that they requested a payment plan, 4 were offered a payment plan and 13 (54%) stated that a payment plan was not available.

Of the 14 respondents who are homeowners, 8 (57%) pay less than \$1000 per month for their mortgage. 4 (29%) pay less than \$250 per month. Most homeowners (11) can afford to pay over \$750 per month in mortgage expense.

Of the 23 respondents who are tenants, 61% pay between \$251 – 750 in rent per month and another 5 (22%) pay between \$751-\$1000. Among tenants, 11 (49%) stated that the maximum rent that they can afford to pay is between \$251-\$750, 6 can pay between \$751 and \$1000, 5 can pay between \$1001 and \$1500 and 2 can pay over \$1500.

D. Remediation of Findings

Where there is a Determination of Unlawful Segregation or other Housing Discrimination by a Court or a Finding of Non Compliance

Information regarding discrimination cases is found in Section D of this Report.

F. New Bedford Programs

In acknowledging the complex relationships that exist between discrimination, housing, soci-economic and cultural realities, the City of New Bedford, acting through it's Office of Housing and Community Development, strives to ensure housing opportunities are available to all on an equitable basis.



The City of New Bedford is home to public and private fair housing programs and activities including resources one may utilize in filing complaints regarding fair housing and resources available for individuals and families seeking housing assistance.

A. Current Public and Private Fair Housing Programs in New Bedford

1. Public Programming

Although the City of New Bedford does not currently have a municipal Fair Housing Program exclusively intended to provide an office through which consumers may file complaints, such housing complaints can be reported through the City's Office of Housing and Community Development [OHCD] as further discussed in Section D Fair Housing [Analysis of Trends and Patterns]. Presently the OHCD provides a mechanism online at www.ci.new-bedford.ma.us/ohcd.htm whereby one may forward housing complaints to HUD, directly, or the Massachusetts Commission Against Discrimination [rather than addressing such complaints locally]. Once fair housing complaints are screened by MCAD, they are then investigated by the applicable City Department[s]. These investigations may include such departments as the Health Department who may investigate lead paint complaints.

Aside from its online fair housing information, the City's OHCD also provides upwards of 5 first time homebuyer's seminars each year providing critical information to hundreds of potential homeowners. Translators for both Spanish and Portuguese participants are available for each session. These popular homebuyer seminars are conducted in a public-private partnership that involves local lending institutions and local agencies that include the New Center for Legal Advocacy, the Greater New Bedford Association of Realtors, the Childhood Lead Poison Prevention Program, Home Inspection and Home Maintenance vendors and Consumer Credit Counseling. These seminars have historically attracted a wide range of residents from a broad swath of City neighborhoods.

In addition to the first time homebuyer seminars, the OHCD also provides informational sessions on housing issues and home buying information for interested groups such as the City's many neighborhood associations, faith based groups, social service agencies and other groups and individuals upon request.

Outside of the OHCD, the New Bedford Housing Authority has also been instrumental in providing education and information to their tenants and consumers. The NBHA offers a Section 8 Homeownership Program to tenants who are granted Section 8 certificates. This Section 8 Homeownership Program—one that includes participants with portable vouchers—gives participants the option of purchasing a home with their Section 8 assistance rather than renting.

2. Private Programming

Fair housing education and information programs and activities originating exclusively from the private sector in New Bedford are largely found within the providers and organizations participating within the City's Continuum of Care and further discussed in Section E [C.1] of this report. Most of these private agencies provide some form of fair housing education on an ongoing and informal basis through updated brochures, events and programming activities. Historically many of these agencies only had the capacity to offer basic housing information due to understaffing for this particular purpose. However, over the past several years, New Bedford-based providers have slowly increased some staffing and resources so as to offer consumers a wider range of housing services and advocacy-related assistance including tenant and landlord rights information, legal referral services, housing search assistance and in some cases, first and/or last month payments or security.

In addition to these services, the City currently receives funding from HUD to provide Homeless Management Information System assistance for the City's Continuum of federally-funded agencies serving homeless/homeless-threatened populations. The vendor selected to undertake this work, HousingWorks, not only provides the required programmatic mechanisms needed to report homeless data to service agencies, but also offers a housing advocacy module to all its New Bedford-based subscribers that allows agencies to conduct housing searches meeting client needs through its data base, file housing authority applications for any housing authority and monitor the status of individual clients in assisting them to secure decent, accessible housing.

For those residents already in tenant-based housing who wish to file a discrimination complaint against a landlord or other individuals and require assistance not handled by the wide range of New Bedford

agencies part of this network, the New Center for Legal Advocacy [NCLA] is available. The NCLA provides fair housing education and advocacy for low-income families and individuals in addition to other legal services. Throughout the year the NCLA partners with the OHCD in the first time homebuyer's seminars and is a member of the City's Homeless Service Provider's Network.

B. Assessment of Public Housing Programs in New Bedford

The City of New Bedford, through its OHCD, has an established housing rehabilitation program utilizing not only state but local resources earmarked for housing rehabilitation programs, but also CDBG and HOME funding. Figure F-1 identifies how the extent to which CDBG and HOME funds have statistically assisted City residents between fiscal years 2001 and 2005. This chart demonstrates that in the past five fiscal year cycles almost 500 households have been provided either CDBG or HOME-based housing assistance. This assistance, stemming from a number of the OHCD's first-time homebuyer, homeowner rehabilitation, lead paint abatement and rental housing programs are complimented by a number of other affordable housing initiatives that it undertakes [Figure F-2].

Of particular note is the City's "Neighborhood's First" program. This program is effectively a first-time homebuyer program instituted to help overcome come of the economic impediments to homeownership encountered by low-income persons wishing to purchase single family or multi-family [2-4 unit] housing in New Bedford. This program offers down payment/closing cost assistance, rehabilitation and gap financing to enable eligible applicants to own their own first homes.

First time home buyers in this program must meet HUD income limits, qualify for a mortgage with a participating lender and complete an approved First Time Home Buyer Seminar. The first \$10,000 loaned under this program is 0% deferred and is forgiven after 10 years while rehab loans over \$10,000 are fully amortized at 3% for terms up to 30 years. Downpayment and closing cost assistance is offered up to \$6,000 and gap or rehab assistance [to correct code violations and addressed lead-based paint] is offered up to \$20,000 for single units, \$30,000 for two unit properties and up to \$40,000 for three or four units. This program significantly contributes in easing the housing cost burden for potential first time homebuyers.

Additional programs including the OHCD's Financial Assistance Program [assistance to comply with Minimum Housing Quality Standards], Housing Accessibility Program [assisting those with physical disabilities] and Senior At Home Program [helping senior citizens] are offered by the OHCD to income-eligible applicants to assist individuals and families retain their existing housing. Lead Paint programs similarly provide necessary assistance to households and is critical in easing what can be overwhelming housing costs for average homeowners.

This Section concludes with Figure F-3 that profiles a typical first time homebuyer coming through the OHCD's program.

	CDBG						HOME						TOTALS					
	Units Asstd*	Hshlds Asstd*	Minorities**			Female Head of Hshld	Units Asstd*	Hshlds Asstd*	Minorities**			Female Head of Hshld	Units Asstd*	Hshlds Asstd*	Minorities**			Female Head of Hshld
			H	B	O				H	B	O				H	B	O	
2001	56	56	6	8	0	19	85	45	19	4	1	18	141	101	25	12	1	37
			11%	14%	0%	34%			42%	9%	2%	40%			25%	12%	1%	37%
2002	51	51	12	10	1	30	19	19	6	4	1	9	70	70	18	14	2	39
			24%	20%	2%	59%			32%	21%	5%	47%			26%	20%	3%	56%
2003	39	39	7	15	1	19	20	20	4	8	0	10	59	59	11	23	1	29
			18%	38%	3%	49%			20%	40%	0%	50%			19%	30%	2%	49%
2004	58	96	11	10	6	70	63	58	14	8	3	26	121	154	25	18	9	96
			11%	10%	6%	73%			24%	14%	5%	45%			16%	12%	6%	62%
2005	41	61	8	12	2	37	30	27	8	4	0	13	71	88	16	16	2	50
			13%	20%	3%	61%			30%	15%	0%	48%			18%	18%	2%	57%
TOTAL	245	303	44	55	10	175	217	169	52	28	5	76	462	472	95	83	15	251

Figure: F-1 : City Based Housing Programs 2001 - 2005
Source: Office of Housing and Community Development, City of New Bedford

Notes to Accompany Figure F-1:

* Units Assisted represents the number of housing units assisted; this figure differs from the number of households assisted in the adjoining column that relates to the number of households or "families" assisted by the funding source identified. Units assisted may only identify one unit that includes several households, therefore its number will be lower than those listed under households as was the case in 2004 and 2005 under the CDBG program. Conversely, sometimes the number of units assisted actually exceeds the number of households assisted because at the time of closing the fiscal year, units that received HOME funds had not yet been occupied by anyone, as was the case in 2001, 2004 and 2005.

** Minorities as reported in this chart represent those individuals self-identifying as "Hispanic", "Black" or "Other." The total number of minorities plus the total number of those individuals identifying as "white" [figures not a part of this chart] equal the total number of persons within households assisted.

First Time Homebuyer Programs	<ul style="list-style-type: none"> ▪ Neighborhoods First Home Buyer Program ▪ Massachusetts Housing Partnership—Soft Second Program ▪ Fannie Mae Housing Starts Program ▪ MassHousing Neighborhood Rehabilitation Program
Homeowner Rehabilitation Programs	<ul style="list-style-type: none"> ▪ Financial Assistance Program ▪ At Home Program ▪ Handicap Accessibility Program ▪ MassHousing Home Improvement Loan Program
Lead Paint Abatement Programs	<ul style="list-style-type: none"> ▪ Lead Paint Reimbursement Program ▪ MassHousing “Get the Lead Out” Program
Rental Housing Programs	<ul style="list-style-type: none"> ▪ HOME Rental Rehabilitation Program
Affordable Housing Initiatives	<ul style="list-style-type: none"> ▪ Promote mortgage products, community lending products, multi-family financing and other types of affordable housing investments. ▪ Established the Mayor’s Housing Task Force to develop strategies to promote homeownership and affordable housing. ▪ Coordinate the City’s Continuum of Care efforts through its membership component, the Homeless Service Provider’s Network ▪ Provide funding for the development and operation of supportive housing. ▪ Conduct community roundtables on current housing industry issues. ▪ Support many affordable housing organizations and activities within the community. ▪ Conduct Homebuyer Counseling Seminars comprised of professionals from the banking, legal, real estate and housing community. ▪ Conduct educational and training presentations, workshops and seminars. ▪ Conduct empirical studies of targeted neighborhoods. ▪ Distribute affordable homebuyer program information and provide technical assistance. ▪ Advocacy and network activities with housing groups, financial institutions, housing providers and others involved in the housing industry. ▪ Coordination and preparation of the Analysis of Impediments to Fair Housing Choice for the City of New Bedford ▪ Active in the City’s Tax Title Disposition Program ▪ Working with the Attorney General’s Receivership Program

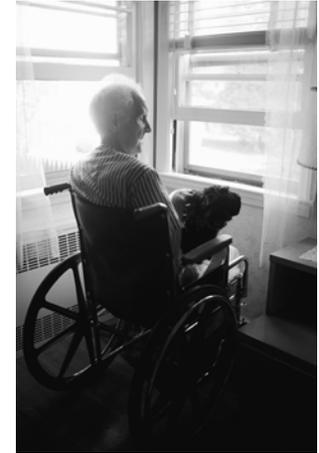
Figure: F-2 : OHCD Housing Activities
Source: Office of Housing and Community Development, City of New Bedford

**First Time
Homebuyer
Profile**

- Four person family with an annual income of \$31,875
- Non-Housing debt is around \$300/month
- Although some past indiscretions, credit history is good
- Family purchases a two-family home for around \$200,000
- Mortgage is a 30 year fixed rate at 5.75% with a \$3,000 down payment [1.5%]
- First mortgage is around \$194,000
- Second mortgage is held by Neighborhood's First program around \$26,000 [down payment/closing costs plus rehab]
- Principal/Interest/Taxes/Insurance [PITI] is around \$1,332 minus \$563 of rental income for a resulting monthly mortgage payment of \$869

Figure: F-3 : Neighborhoods First Program Applicant Profile
Source: Office of Housing and Community Development, City of New Bedford

G. Conclusions



Conclusions and Recommendations

Fair Housing is complex and involves diverse and wide-ranging considerations. The many impediments to Fair Housing choice include, among others, discriminatory real estate and lending practices, Not In My Backyard (NIMBY) attitudes, exclusionary zoning regulations, and discouraging families with children from renting because a landlord does not want to take steps to delead an apartment. Each impediment, however, must be considered through the lens of economic, historical housing patterns, and personal choice.

Along with this view comes the need to remember that ultimately the decision of where to live depends largely on housing affordability, something that is, in itself, a complex web of employment considerations, the need for and proximity to, services, access and availability of public transportation and related factors largely dependent upon supply and demand, and personal income. Realistically the economics of the marketplace, therefore, limits the availability of housing to households with limited income and may lead to the concentration of minority groups in certain neighborhoods.

This Analysis has noted that the demand for safe, decent and affordable housing within the City of New Bedford has proportionately increased with a growing low and moderate-income population rooted in an increasingly diverse minority population. With such minority population growth, race has subsequently been identified as being a particularly significant impediment to fair housing. Similarly, recognizing the income disparity between racial groups in the City is critical in one's attempt to identify impediments to fair housing.

Referring to Figure G-1, one notes that Latino and Black households are disproportionately affected by lower incomes compared to non-minority households. According to the 2000 U.S. Census, there were 93,768 persons in New Bedford. Although just over 10% of these New Bedford residents were Hispanic and 4.4% were Black, 46% of the Hispanic population [4,434 persons] and 34% of the Black population [1,399], respectively, were living below the poverty line. This compares starkly with the 16% of whites living in poverty. Similarly, the Median Household Income [MHI] and Median Family Income [MFI] brackets for Blacks and Hispanics falls far below the City's overall MHI and MFI confirming that Black and Hispanic households bear an increased burden of poverty and very low income compared with City residents as a whole.

Race/Ethnicity	Population	Number Below Poverty Level	Percentage Below Poverty	MHI	MFI
White	73950	11573	16%	30,051	38,567
Hispanic	9576	4434	46%	15,124	16,015
Black	4112	1399	34%	21,599	23,427
Other	6130				
Total City	93768	18754	20%	27,569	35,708

Figure: G-1: Race & Ethnicity Income Data
Source: U.S. Census Bureau.2000

Given these ratios, it is evident that both the Hispanic and Black communities are particularly limited in housing choices simply based on income. HUD’s Comprehensive Housing Affordability Strategy [CHAS] presented in the City’s Consolidated Plan 2005-2009 additionally provides insight into the extent to which minority households are unequally burdened with housing problems.¹

The Consolidated Plan 2005-2009 furthers this discussion of disproportionate housing needs within certain populations by citing CHAS statistical data that suggests approximately half of all households—rental and ownership—that are below 80% of the median family income level report housing problems as compared with only 8% of the households at or above the median family income level. These statistics provide clear evidence that households earning less than 80% of the Median Family Income experience disproportionate housing needs compared to those households at or above 80% of the MFI.² Such race and income indices largely translate to impediments in achieving fair housing for many in New Bedford.

Oftentimes historical housing patterns may also cause impediments to Fair Housing. Many neighborhoods with higher minority concentrations—such as the South Central area and the Acushnet Heights neighborhood—are primarily made up of larger multi-family stock. This contrasts to those northernmost and southernmost sections of the City (including but not limited to census tracts 1, 2, 22 and 28) that tend to have fewer multi family rental properties and many more single-family residences. This indicates that due to historic patterns of growth, lower income families who rent or need to purchase multi family residences in order to qualify for a mortgage have more options in far fewer areas of the City.

Flowing from this particular issue comes the acknowledgement of personal choice as an important consideration in the examination of Fair Housing issues. Every household regardless of race, disability, or other characteristic is free to choose where to reside. Spanish, Kriolu and Portuguese speaking households may prefer to live in their respective neighborhoods

¹ Income levels and race: Consolidated Plan 2005-2009 Section 5.23

² 73% of all households with lower than 30% Median Family Income reported housing problems, 50% of those households with income levels at 31% - 50% reported housing problems and 26% of moderate income households at 51% - 80% reported housing problems.

where they may have extended family and purchase goods and services from their own ethnic-based markets. The reality that the concentration of minority groups in some neighborhoods may reflect that choice is critical to bear in mind when considering the bigger picture of fair housing choice.

It is important, then, to examine Fair Housing choice in conjunction with economics, historical housing patterns, and personal choice. The purpose of the Fair Housing laws extend beyond these basic issues to consider discrimination reflected within the housing delivery system. This analysis attempts to examine the impediments to housing choice within the context that each household has the opportunity to make a personal housing choice that is within their economic means.

So as to better articulate the breadth of impediments to fair housing in New Bedford as discussed within this report, the following table provides a listing of impediments already identified and recommended actions that can be taken to alleviate—and where possible—eliminate impediments to fair housing in the City of New Bedford:

Impediment	Action Steps
<p>Poverty The prevalence of poverty in the City of New Bedford affects the entire community and disproportionately affects minority populations.</p>	<ul style="list-style-type: none"> ▪ Work to develop effective public policy that supports and builds up the capacity and opportunities of those who live in poverty. ▪ Undertake employment strategies that help people in poverty to attain self-sufficiency including expansion of job availability of low income persons through the enforcement of the Section 3 initiative and by providing assistance to low and moderate income persons for the development of micro-enterprise businesses. ▪ Support housing strategies that help those in poverty move into self-sufficiency including the continued development of safe, decent and affordable housing.
<p>Qualifying for Financing There is an inability of families and individuals to qualify for mortgages.</p>	<ul style="list-style-type: none"> ▪ Encourage local professional associations [real estate agents, lenders, apartment owners and homebuilders] to promote housing choice through special advertising and outreach programs. ▪ Reinforce fair housing training to lenders so as to educate them on individual responsibilities under the Fair Housing Act.

Impediment	Action Steps
<p>Locational Discrimination Although minorities live throughout the City of New Bedford, the 2000 U.S. Census indicates that these populations tend to be concentrated within census tracts that are characterized by lower incomes and higher crime rates.</p>	<ul style="list-style-type: none"> ▪ Undertake programs, projects and initiatives that support the deconcentration of poverty in the City. ▪ Increase affordability and access to affordable rental units and homeownership opportunities in all City census tracts ▪ Provide additional Fair Housing Education programs and opportunities through community-wide educational events in concert with the MA Commission on Discrimination and the City’s OHCD in order to help residents develop an increased understanding of their rights under the law. ▪ Continued targeting of the South Central, Cove Street, Acushnet Heights and other distressed, blighted, highly concentrated minority neighborhoods in an effort to build awareness and develop substantive policy that would revitalize and stabilize these neighborhoods.
<p>Discrimination and Private Sector Actions Loan origination rates for minority applicants are far below community averages.</p>	<ul style="list-style-type: none"> ▪ Increase education about fair housing rights to potential applicants seeking home purchase loans, refinancing/ equity loans or second mortgage loans as well as potential tenants. ▪ Increase education to private sector mortgage lenders, realtors, etc. by reinforcing professional standards and fair housing education through new and existing programs, [e.g. lender orientation breakfast].
<p>Public Sector Actions and Inactions Public policy and regulatory actions—or the lack thereof—can often impede access to fair housing by diminishing opportunities for affordable housing/rental development and retention.</p>	<ul style="list-style-type: none"> ▪ Review and update municipal regulations and City policies to promote housing affordability. ▪ Evaluate effectiveness of waiving any permit fees and/or impact fees for housing affordable to low and moderate income households. ▪ Educate the community, stakeholders and policy makers as to the value of encouraging and retaining affordable housing in New Bedford ▪ Continue to develop strategies that allow for and encourage mixed-use development within the downtown business district
<p>Accessibility Costs There are prohibitive costs involved in retrofitting the housing for handicapped accessibility.</p>	<ul style="list-style-type: none"> ▪ Provide technical assistance through the OHCD to assist local organizations in accessing public funding sources. ▪ Continue using CDBG funding for eligible public facilities projects that meet national objectives and provide greater accessibility to public buildings in the City. ▪ Continue Handicap Accessibility Grant Program for privately-owned dwellings.

Impediment	Action Steps
<p>Minority Representation on City boards There is a lack of minority representation on the City of New Bedford’s boards, particularly its Planning and Zoning Boards.</p>	<ul style="list-style-type: none"> Continue to seek out and recruit qualified minority candidates to fill future openings on all City boards, particularly those entities responsible for land use policy, housing, planning and human rights so as to more closely represent the face of New Bedford in regulatory and policy-based positions.
<p>Lead Paint Because such a large percentage of the City of New Bedford’s housing stock was built prior to 1950—particularly in the South and South Central regions of the City (census tracts 19,26 and 27)—the incidence of lead-based paint is very high. This statistic coupled with the prevalence of absentee landlords in those particular neighborhoods who, for either economic or other reasons, opt not to have their houses delead, equals a large number of substandard housing units requiring lead abatement.</p>	<ul style="list-style-type: none"> Increase public awareness of the OHCD’s Lead Paint Reimbursement program and the MHFA’s “Get the Lead Out Program” for lead paint abatement that provides up to 50% of the approved cost of deleading up to a maximum of \$2,500 per unit through brochures, cable notices and advertisements. Pursue funding at the state and federal levels to maintain and possibly increase availability of these programs so that the City of New Bedford may continue to offer financial and technical assistance to landlords and property owners who wish to delead their homes and apartments.
<p>Blighted, Abandoned or Vacant Properties There are abandoned buildings and vacant lots in blighted City neighborhoods disproportionately affecting areas with higher concentrations of minority residents.</p>	<ul style="list-style-type: none"> Continue work with the Mayor’s Housing Task Force in developing a Vacant Lots and Abandoned Buildings Strategy for the City of New Bedford. Inventory and monitor properties Citywide that could fall either within the abandoned buildings category or that has ongoing, undressed fire and building code violations. Collaborate with the Attorney General’s Office in the combined effort to engage in the Receivership Program, thereby creating the means for the provision of an appointment of receivers by the courts of the state to undertake and oversee the rehabilitation of residential properties with persistent, unremedied code violations. Fund and undertake a demolition program in the City targeting those residential properties that contravene MA Building Code. Update, target and pursue tax title properties

Impediment	Action Steps
<p>Limited Public Awareness and Education Based on survey results tabulated as part of the Analysis of Impediments to Fair Housing, there exists a significant gap in the general public’s understanding of Fair Housing regulations and of the financing options and assistance available.</p>	<ul style="list-style-type: none"> ▪ Undertake a public education campaign regarding Fair Housing regulations and remedies that specifically targets low/moderate income households, those with disabilities or those who might otherwise be left outside of traditional assistance venues. ▪ Designate a City staff person that could be available to the Greater New Bedford Board of Realtors as a resource person/technical assistance liaison for the real estate community to provide ongoing literature and information about housing programs available to the community. ▪ Introduce Fair Housing and financial housing program assistance materials to individuals and families moving through the Continuum of Care through Homeless Service Providers Network meetings and resource materials maintained by the OHCD. ▪ Increase recognition of Fair Housing month with a Citywide outreach effort into all sectors of the population.
<p>Banking Outreach to Minorities There has been a failure of some banks to market their lending services to minorities, thus compromising the banking industry’s ability to adequately reach these marginalized groups.</p>	<ul style="list-style-type: none"> ▪ Host a meeting between City officials and local banking officials to review their marketing plan for reaching minorities. ▪ Encourage local banks to undertake an aggressive marketing campaign for reaching minority applicants. ▪ Consider meetings with those banks that are not investing in certain New Bedford census tracts (that correlate with high minority and low income populations) to solicit a commitment from them to reinvest in these targeted neighborhoods. ▪ Fortify new commitments to reinvest through a community-banking partnership where local banks make specific minimum commitments to lending in underserved neighborhoods.
<p>Landlord Issues At times, potential tenants, as well as service providers placing individuals and families who are moving through the City’s Continuum of Care, have experienced difficulty obtaining permanent rental housing because of landlord resistance to accept the tenancy.</p>	<ul style="list-style-type: none"> ▪ Develop a voluntary strategy regarding tenant acceptance following a collaborative meeting between City officials and local landlord groups to review their application and screening requirements for tenants. ▪ Continue work between service providers in the Homeless Service Provider’s Network and landlords of federally funded units in addressing how clients with poor CORI checks can secure safe, affordable housing.

H. Certification



A. Consolidated Plan Certification.

The following language was included as part of the certifications published with the City of New Bedford's Consolidated Plan 2005-2009:

"Affirmatively Further Fair Housing – The Jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis and maintain records reflection that analysis and actions in this regard."

This Analysis of Impediments to Fair Housing Choice.2006, along with actions being undertaken by the City on an ongoing basis, represents the fulfillment of that statement.

B. City Certification.

The City of New Bedford's Office of Housing and Community Development hereby additionally certifies that:

"Discrimination in the sale, rental, leasing, financing of housing or land to be used for construction of housing or in the provision of brokerage services because of race, color, religion, sex, national origin, handicap or familial status is prohibited by the Federal Fair Housing Act. Furthermore, it is the policy of the City of New Bedford and its Office of Housing and Community Development to ensure equal opportunity in housing for all persons regardless of race, color, religion, sex, national origin, sexual orientation, handicap or familial status and that as such it hereby resolves:

- *That within available resources the City's Office of Housing and Community Development will assist all persons who feel they have been discriminated against because of race, color, religion, sex, national origin, sexual orientation, handicap or familial status to seek equity under federal and state laws by assisting in the filing of a complaint with the Washington Human Rights Commission or the U.S. Department of Housing and Urban Development;*
- *That the City's Office of Housing and Community Development will make copies of this Analysis of Impediments to Fair Housing Choice.2006 available to the general public through the internet and to owners of real estate, developers, bankers and builders to that they can become aware of their respective responsibilities and rights under the Federal Fair Housing Law and applicable state and/or local laws or ordinances*

Having thus developed and updated the foregoing Analysis of Impediments to Fair Housing Choice.2006 in New Bedford Massachusetts so as to comply with HUD regulations 24CFR Part 570.904[c] and with the City's certification to affirmatively further fair housing in conjunction with its Community Development Block Grant program, the City's Office of Housing and Community Development hereby resolves to accept this document as presented on the ___ day of _____, 2007.

Patrick J. Sullivan, Director

Date

I. Appendix



FAIR HOUSING COMPLAINTS

OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT

608 Pleasant Street New Bedford, MA 02740
Tel: (508) 979-1500 Fax: (508) 979-1575

The Office of Housing and Community Development [OHCD] ensures Fair Housing compliance for the City of New Bedford and establishes procedures for compliance and enforcement of local statutes that relate to these areas. This Office is responsible for the production, publication and distribution of the City's Analysis of Impediments to Fair Housing Choice and enforces the City's Section 3 policy relative to federal CDBG/ESG/HOME and SHP fund expenditures, ensuring contractual compliance. Information relative to filing fair housing complaints is available at its downtown office or through its website at www.ci.new-bedford.ma.us/ohcd.htm.

MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION (MCAD)

One Ashburton Place, Room 601 Boston, MA 02108
Tel: (617) 727-3990 Fax: (617) 720-6053 TDD: (617) 720-6054

The MCAD is the civil rights law enforcement agency of the Commonwealth of Massachusetts. The Commission has the power to investigate and decide cases of discrimination in employment, housing, public accommodations, credit, services, and education. In addition to handling complaints, the Commission promulgates rules and regulations, monitors and assists businesses and governments in their efforts to comply with civil rights laws, sponsors educational programs for law enforcement officials responsible for civil rights enforcement, and actively promotes broad public understanding of human rights issues. The MCAD addresses discrimination based on race, color, religious creed, national origin, ancestry, sex, sexual orientation, age, mental status, persons with children, disability, recipient of public assistance, military/veteran status, and criminal record.

SOURCES LIST IN ANALYSIS OF IMPEDIMENTS

- Bureau of Labor Statistics
- City of New Bedford Human Rights Commission
- Donahue Institute UMASS Office of the President ~ Ellen Pader and David Windsor Report
- Fannie Mae Foundation
- Federal Financial Institutions Examination Council [FFIEC]
- Greater New Bedford Realtors Association
- Home Mortgage Disclosure Act Data
- Massachusetts Commission Against Discrimination [MCAD]
- New Bedford Housing Authority
- Mumford Center at the University of Albany ~ 2005 Housing Study
- Office of Housing and Community Development ~ Miscellaneous Studies and Reports
- United States Census Data ~ 1990 & 2000
- United States Department of Housing and Urban Development

Close Window

Fair Housing Survey (Provider) - 05 Dec 2006

First Respondent Date: 10 Oct 2006 23:21

Last Respondent Date: 27 Oct 2006 12:54

Completed Surveys: 16

1. I am a [please check all that apply]:

• Service Provider	12	
• Realtor	0	
• Landlord	1	(View Chart)
• Developer	0	
• Other: (Click to View)	5	
Total:	18	

We annually serve:

• 1 - 5 clients	0	
• 6 - 10 clients	0	
• 11 - 50 clients	2	(View Chart)
• 51 - 100 clients	4	
• 101 - 250 clients	2	
• Over 251 clients	8	
Total:	16	

Check all applicable obstacles your clients face in obtaining housing, circling most prevalent:

• Purchase/Rental Price	15
• Size of required downpayment	13
• Size of monthly payment	14
• Proximity to transportation	2

• Proximity to employment	3	
• Financial literacy	9	
• Housing availability	6	
• Types of units available	3	
• Unit size	0	
• Cost to remove lead	1	(View Chart)
• Financing	9	
• Language barriers	3	
• Cultural barriers	0	
• Other: (Click to View)	0	
Total:	78	

Do you feel that current municipal regulations impede the development of affordable multi-family housing in New Bedford?

• Yes	2	(View Chart)
• No	8	
• I don't know.	6	
Total:	16	

If yes, please specify what regulations are an impediment and why:

[\(Click to View\)](#)

Total: 1

Do other impediments that discourage affordable multi-family housing exist?

• Yes	4	(View Chart)
• No	6	
• I don't know.	6	
Total:	16	

If you answered yes, please specify what these are:

[\(Click to View\)](#)

Total: 4

What number would you rate the need for affordable housing in New Bedford on a scale of 1 - 5, where 1 is "not at all" and 5 is "extreme urgent need"?

• 1	0
• 2	1
• 3	2
• 4	5
• 5	8

[\(View Chart\)](#)

Total: 16

What do you believe is the greatest unmet housing need?

• Single family home	4
• Apartments	1
• HP accessible units	0
• Three bedroom units	2
• Assisted living units	1
• Multi-family housing	1
• Condos	1
• Two bedroom apartments	0
• Four bedroom apartments	1
• SRO units	4
• Other: (Click to View)	0

[\(View Chart\)](#)

Total: 15

To your knowledge, have any of your clients experienced discrimination while trying to acquire housing in New Bedford?

• YES	3
• NO	13

[\(View Chart\)](#)

Total: 16

If yes, how so?

• Race/ethnicity	2	
• Sexual orientation	0	
• Religion	0	
• Family size	0	
• Age of children	1	(View Chart)
• Pets	0	
• Health or disability	2	
• Age	0	
• Family composition	1	
• Other: (Click to View)	1	
Total:		7

And by whom?

• Landlord	2	
• Realtor	1	
• Neighbors	1	(View Chart)
• Mortgage broker/banker	0	
• City agency/employee	0	
• Other: (Click to View)	1	
Total:		5

If you rent out apartments, what do you require of potential tenants?

• First month's rent	4	
• Last month's rent	3	
• Security deposit	3	(View Chart)
• Signed lease	3	
• References	3	
• Other: (Click to View)	0	
Total:		16

How many housing problems -- if any -- were

reported to you or your agency/company between January 2002 and December 2005?

• None	4	
• 1 - 5	7	
• 6 - 10	1	(View Chart)
• 11 - 15	1	
• 16 - 25	1	
• Over 25	1	
Total:	15	

What types of assistance do you provide to consumers to assist them in obtaining housing?

• Financial assistance	10	
• Housing search	6	
• Language	4	(View Chart)
• Education on their rights	6	
• Financial guidance	10	
• Section 8 guidance	5	
• Other: (Click to View)	1	
Total:	42	

If you provide housing search assistance to your clients, please list the top three sources you use in order of priority:

[\(Click to View\)](#)

Total: 6

During the past year how many requests for affordable housing would you estimate your office handled?

• None	1	
• 1 - 5	1	(View Chart)
• 6 - 10	3	
• 11 - 15	1	
• 16 - 25	1	

- *Greater than 25* 9
- Total:** 16
-

Does your office have a backlog of these requests?

- YES 5 [\(View Chart\)](#)
 - NO 11
- Total:** 16
-

Does your agency have a person whose primary responsibility is housing?

- Staff person 9 [\(View Chart\)](#)
 - Consultant 1
 - No 5
- Total:** 15
-

If your clients/applicants had difficulty borrowing money, please indicate the primary reason:

- Not enough verifiable income 6
 - Not enough cash to put in 0
 - Too much outstanding debt 2
 - Previous history with lender 0 [\(View Chart\)](#)
 - Low property appraisal 0
 - Credit problems 7
 - Discrimination 0
 - Unknown 0
- Total:** 15
-

What percentage of your clients/consumers would you estimate have a disability affecting their housing needs?

[\(Click to View\)](#)

Total: 9

What percentage of your clients/consumers would you estimate receives financial assistance (beyond

a traditional mortgage) for housing?

[\(Click to View\)](#)

Total: 10

SECTION 8:

[\(Click to View\)](#)

Total: 6

RENT SUBSIDY:

[\(Click to View\)](#)

Total: 8

MORTGAGE PAYMENT ASSISTANCE:

[\(Click to View\)](#)

Total: 5

DOWN PAYMENT ASSISTANCE:

[\(Click to View\)](#)

Total: 6

WEATHERIZATION ASSISTANCE:

[\(Click to View\)](#)

Total: 4

FUEL ASSISTANCE:

[\(Click to View\)](#)

Total: 7

LEAD PAINT REMOVAL:

[\(Click to View\)](#)

Total: 4

OTHER:

[\(Click to View\)](#)

Total: 2

If you're a provider, what percentage of your clients do you estimate had to surrender their Section 8 voucher because in 2005 they were unable to locate qualified housing?

[\(Click to View\)](#)

Total: 4

If you're a landlord, do you accept Section 8 vouchers?

- | | | |
|-------|---|------------------------------|
| • YES | 2 | (View Chart) |
| • NO | 1 | |

Total: 3

What percentage of your units are Section 8 vouchers?

[\(Click to View\)](#)

Total: 4

What percentage are project-based?

[\(Click to View\)](#)

Total: 2

If you think more support or education services are needed for renters and first time homebuyers, please check those you consider important:

- | | | |
|--|----|------------------------------|
| • Budgeting | 12 | |
| • Checking account education | 4 | |
| • Credit card education | 9 | (View Chart) |
| • First time homebuyer's program | 11 | |
| • Language literacy | 0 | |
| • Other: (Click to View) | 1 | |

Total: 37

What types of incentives would encourage the

preservation or creation of more affordable housing, either apartments, new housing or condos in the City of New Bedford? (check no more than three)

- *More Low Income Housing Tax Credits* 10
- *Simplified permitting* 3
- *Larger subsidies for tenants* 1
- *Landlord incentives* 4
- *Zoning changes* 3
- *Developer incentives* 4
- *Other:* [\(Click to View\)](#) 1

Total: 26

[\(View Chart\)](#)

~ End of Report ~

Close Window

[Close Window](#)

Fair Housing (consumer) - 05 Dec 2006

First Respondent Date: 11 Oct 2006 16:45

Last Respondent Date: 19 Nov 2006 17:38

Completed Surveys: 48

I am a (please check one):

• Homeowner	14	
• Homeless	1	(View Chart)
• Tenant	24	
• Potential New Bedford Resident	8	
Total:	47	

I have lived at my current address for:

• Less than one year	7	
• 1 - 3 years	9	(View Chart)
• 3 - 5 years	7	
• Over 5 years	25	
Total:	48	

I searched for my current housing for:

• Less than 30 days	19	
• 30 days - 6 months	19	(View Chart)
• 6 months - 1 year	3	
• Over 1 year	3	
Total:	44	

I currently live in (check all applicable):

• Single family house	24
-----------------------	----

• 2 - 3 family house	18	
• Condo	0	
• Apartment	7	
• Rooming House	0	(View Chart)
• Nursing Home	0	
• Assisted Living/Congregate housing	0	
• Mobile Home/Trailer	0	
Total:	49	

Is this the type of housing that you were looking for?

• YES	32	(View Chart)
• NO	16	
Total:	48	

If not, what were you looking for?

• Single family house	9	
• 2 - 3 family house	3	
• Condo	3	
• Larger Apartment	4	(View Chart)
• Rooming House	0	
• Nursing home	0	
• Assisted Living/Congregate Housing	0	
• Mobile home/trailer	0	
Total:	19	

Have you ever experienced any problems when being shown a particular house/apartment that was for sale/available?

• YES	15	(View Chart)
• NO	31	
Total:	46	

If you answered "yes" does any of the following

apply?

• The house/apartment was in an affluent neighborhood	3	
• The realtor/landlord refused to show a particular house/apartment	3	(View Chart)
• The house/apartment was in a poor neighborhood	11	
Total:	17	

How did you locate your present housing?

• Newspaper/advertising	10	
• Realtor/landlord	6	
• Housing authority assistance	1	
• Word of mouth	15	(View Chart)
• Signage	2	
• Social Service Agency Assistance	2	
• Other: (Click to View)	13	
Total:	49	

Is there anything that would have made your housing search easier?

• YES	6	(View Chart)
• NO	37	
Total:	43	

If yes, please tell us what:[\(Click to View\)](#)**Total: 4****If you own a house, did you experience difficulty obtaining property insurance?**

• YES	3	(View Chart)
• NO	13	
• NOT APPLICABLE	27	
Total:	43	

If you rent an apartment, what did you need to provide?

• Not applicable	13
• First month's rent	15
• Last month's rent	10
• Security deposit	10
• Signed lease	4
• References	7
• Other: (Click to View)	1

Total: 60

[\(View Chart\)](#)

Did you request a payment plan or was one offered to you?

• Requested	3
• Didn't ask	10
• Offered	4
• Not available	13

Total: 30

[\(View Chart\)](#)

What is your current monthly rent or mortgage payment?

• Less than \$250	8
• \$251 - \$750	18
• \$751 - \$1000	7
• \$1001 - \$1500	5
• \$1501 - \$2000	2
• \$2001 or more	4

Total: 44

[\(View Chart\)](#)

What is the maximum monthly payment that you feel you can afford to pay for your housing?

• Less than \$250	1
• \$251 - \$750	15

[\(View Chart\)](#)

• \$751 - \$1000	7
• \$1001 - \$1500	18
• \$1501 - \$2000	4
• \$2001 or more	3
Total:	48

Please check any housing assistance that you have received IN THE PAST:

• Section 8	5
• Rent subsidy	2
• Mortgage payment	1
• Down payment	4
• Fuel assistance	8
• Weatherization	3
• Lead paint removal	0
• Other: (Click to View)	1
• I have not received any assistance in the past	26
Total:	50

[\(View Chart\)](#)

Please check any housing assistance that you CURRENTLY receive:

• Section 8	1
• Rent subsidy	0
• Mortgage payment	2
• Down payment	2
• Fuel assistance	4
• Weatherization	0
• Lead paint removal	0
• Other: (Click to View)	1
• I do not receive any assistance	17
Total:	27

[\(View Chart\)](#)

If you currently need assistance, what kind do you

need and don't have?[\(Click to View\)](#)**Total: 3****What difficulties have you had in obtaining or keeping adequate housing (check all that apply):**

- financial problems 12
- language barriers 0
- desired housing not available 7
- amount of "up-front" money was not available 9
- increased monthly payments 9
- unsatisfactory credit 4
- unable to find housing 3
- personal problems 1
- health/disability issues 3

[\(View Chart\)](#)**Total: 48****Do you think you have ever experienced discrimination in trying to get housing within the City of New Bedford?**

- YES 9
- NO 35

[\(View Chart\)](#)**Total: 44****If yes, how so?**

- race/ethnicity 2
- sexual orientation 0
- religion 0
- family size 1
- age of children 4
- pets 5
- health or disability 2
- age 3
- family composition 0

[\(View Chart\)](#)

- Other: [\(Click to View\)](#) 4
- Total: 21**
-

In terms of getting/keeping housing, do you feel that you have been discriminated against by any of the following:

- landlord 5
 - realtor 1
 - neighbors 1 [\(View Chart\)](#)
 - mortgage broker/banker 0
 - city agency/employee 0
 - Other: [\(Click to View\)](#) 0
- Total: 7**
-

Do you have a disability affecting your housing needs?

- YES 2 [\(View Chart\)](#)
 - NO 42
- Total: 44**
-

If yes, has this disability negatively affected your ability to find adequate housing?

- YES 2 [\(View Chart\)](#)
 - NO 6
- Total: 8**
-

Have you asked for accomodations to make housing more accessible?

- YES 0 [\(View Chart\)](#)
 - NO 14
 - NOT APPLICABLE 22
- Total: 36**
-

If yes, have you been accomodated?

- YES 0 [\(View Chart\)](#)

- NO 5
- Total: 5**
-

If you do NOT have a savings or checking account at a bank or credit union, please identify why:

- language barrier 0
 - never had one 1
 - past problems 0 [\(View Chart\)](#)
 - high fees/minimum deposit requirements 2
 - don't have enough money 2
 - don't trust banks 0
- Total: 5**
-

Have you ever applied to a bank, etc. to purchase or improve a house?

- YES 18 [\(View Chart\)](#)
 - NO 23
- Total: 41**
-

If you were denied a loan, please check all applicable reasons:

- not enough verifiable income 4
 - not enough cash to put in 3
 - credit problems 6
 - previous history with lender 0 [\(View Chart\)](#)
 - property appraisal too low 1
 - too much outstanding debt 3
 - discrimination 0
 - unknown 0
 - Other: [\(Click to View\)](#) 0
- Total: 17**
-

Your household size is:

- 1 3

• 2	18	
• 3	10	
• 4	6	
• 5	3	(View Chart)
• 6	1	
• 7	0	
• 8+	0	
	Total: 41	

Your household income range:

• Less than \$35,450	8	
• \$35,451 - \$40,500	5	
• \$40,501 - \$45,600	4	
• \$45,601 - \$50,650	1	
• \$50,651 - \$54,700	1	(View Chart)
• \$54,701 - \$58,750	1	
• \$58,751 - \$62,800	3	
• \$62,801 - \$66,850	0	
• \$66,850 or more	16	
	Total: 39	

The head of household is:

• male	24	(View Chart)
• female	10	
	Total: 34	

Your ethnic background:[\(Click to View\)](#)**Total:** 25**Your race:**[\(Click to View\)](#)**Total:** 29