MANCHESTER, NH ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

June 2013

Final Draft

The City of Manchester has developed an Analysis of Impediments to Fair Housing Choice (AI) to satisfy requirements of the Housing and Community Development Act of 1974, as amended.

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Manchester, NH Analysis of Impediments to Fair Housing Choice

FINAL DRAFT

EXECUTIVE SUMMARY

The City of Manchester has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This Analysis includes a review of applicable City policies, practices, and procedures, along with an assessment of conditions, both public and private, affecting fair housing choice.

The Manchester Planning and Community Development Department (PCD) and the consulting team conducted outreach and received community input from February to March 2013 on the issue of fair housing choice. The analysis and community input were used to define the impediments to fair housing choice in the City of Manchester.

The analysis reveals that while progress is being made, issues of segregation are ongoing and impediments to fair housing choice still need to be addressed. The impediments to fair housing choice in the City of Manchester were identified as follows:

1. **Insufficient Quality Affordable Housing**
2. **Crime and Safety**
3. **Housing Options for the Homeless/ At-risk of Homeless**
4. **Language and Cultural Barriers**
5. **Insufficient Fair Housing Information, Training, Education and Outreach**
6. **Insufficient Public Transportation and Services Outside the Center City**
7. **Discrimination and Patterns of Segregation**

An action plan to address the impediments to fair housing choice can be found in Section IX. The City will incorporate actions, as appropriate, into the Annual Action Plan (AAP) and report on progress towards the actions in the Consolidated Annual Performance and Evaluation Report (CAPER).

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I. INTRODUCTION

The City of Manchester has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. As a recipient of CDBG funds, the City of Manchester has certified that they will affirmatively further fair housing and as part of the Consolidated Plan reporting requirements, undertake fair housing planning through the completion of an AI, along with an Annual Action Plan (AAP) and a Consolidated Annual Performance and Evaluation Report (CAPER).

This Analysis includes a review of applicable City policies, practices, and procedures, along with an assessment of conditions, both public and private, affecting fair housing choice. Impediments to fair housing choice are defined as, "Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices. Any actions, omissions or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin."

Equal and free access to residential housing (housing choice) is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals. Because housing choice is so critical, fair housing is a goal that Government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.[1]

The Manchester Planning and Community Development Department (PCD) is responsible for the preparation and implementation of the AI. Staff from PCD, along with the Southern New Hampshire Planning Commission (SNHPC) consulting team conducted a survey of local area residents and housing industry professionals and stakeholders. The surveys were made available from February – March 2013. The survey for local area residents was advertised and made available to the public through the City's website, the SNHPC website, public posting and social media outlets. Service agencies and organizations in the City were also contacted and encouraged to publicize the survey to those that they serve. The second survey was distributed to housing industry professionals and stakeholders to gain input from those who work on housing initiatives professionally or as an organization. Hardcopies of the survey were made available to those without internet access at City Hall and the two public libraries in the City. Additionally, free public internet access is available at the City libraries where the survey was advertised, for those who wish to use that format to respond. For non-English speakers, the survey was distributed to partner organizations that made staff available to translate and assist in filling out the survey. In total, the survey had 182 responses. A summary of the survey responses can be found in Appendix B.

In addition to the surveys, Manchester PCD and the consulting team facilitated a focus group meeting of housing industry professionals and stakeholders on March 22, 2013. Meeting attendees provided feedback and input on data and survey results that were presented, along with input on what the impediments to fair housing choice are in the City. A summary of this focus group meeting can be found in Appendix B.

[1] United States Dept. of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. "Fair Housing Planning Guide." Volume 1. 1996. Print.

FEDERAL LAW

Fair Housing Act Overview

In 1968 the U.S. Congress made efforts to end housing segregation in the U.S. At this time the Chicago Open Housing Movement had raised awareness regarding fair housing problems over the previous three years and Martin Luther King Jr. had recently been assassinated, causing much civil unrest. Title VIII of the Civil Rights Act of 1968, commonly known as the Fair Housing Act, made acts of housing discrimination based upon race, sex, national origin, religion or ethnicity illegal. In 1988 the Act was amended in order to make acts of discrimination against families with children and people with mental or physical disability illegal as well. To ensure fair housing requirements are being met, states and local governments must have an Analysis of Impediments to Fair Housing Choice (AI). The U.S. Department of Housing and Urban Development (HUD) is designated by statute to administratively enforce federal housing discrimination laws such as the federal Fair Housing Act.. Estimates of housing discrimination which are in violation of the Fair Housing Act range from two to four million cases a year.

Westchester County Case

While states and local governments must have an AI in order to certify that they are meeting legal requirements to affirmatively further fair housing, these requirements have historically been overlooked by HUD. The Westchester County, New York case marks a turning point of new attention from HUD under the Obama administration. In a lawsuit brought by the Anti-Discrimination Center alleging racial segregation, a U.S. District Court ruled in 2009 that Westchester County's AI had "utterly failed" and that all of Westchester's certifications that it had or would affirmatively further fair housing were "false or fraudulent." Rather than furthering integration and fair housing, Westchester County policies were actively causing racial segregation by locating affordable housing developments in areas where African-Americans were already highly segregated. A court settlement was reached requiring the county to spend over $51 million to develop new affordable housing, with the majority of this housing in areas with low ratios of people of color. In 2010 and in 2011, Westchester's AI's were once again rejected by HUD when they did not meet the agency's detailed requirements, resulting in the 2011 temporary suspension of more than $7 million in Community Development Block Grant (CDBG), HOME, and Emergency Shelter Grant (ESG) funds.[2] The Westchester County case establishes that state and local governments who are recipients of HUD funds must conduct meaningful AIs and ensure that their ordinances and policies do not result in racial segregation or other discriminatory outcomes.

Civil Rights Act

The Civil Rights Act of 1964 is widely recognized as landmark federal legislation which made discrimination on the basis of race, ethnicity, nationality, religion, and gender illegal. The groups of people who benefit from the Act are referred to as "protected classes." Dissent in the 1960s regarding the widespread discrimination against persons of African descent led to the enactment of the Act, which was originally called for by President Kennedy and successfully signed into law under President Johnson. Title VI of the Act sets forth explicit legal obligation to provide equal access to housing for the protected classes. The Act also imparts equal rights for these protected classes in the following areas: voting, public accommodations, public facilities and public education, federally assisted programs, and employment.

[2] National Low Income Housing Coalition. "2012 Advocates' Guide to Housing & Community Development Policy." *NLIHC*. 2012. Web. 18 March 2009.

2007 Limited English Proficiency Guidance

The Civil Rights Act of 1964, under Title VI, states that no person "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." Since persons with limited English proficiency (LEP) have a limited ability to speak, read, write, or understand English as a result of national origin, they are protected under the Act. LEP persons received further protection from federal case law, Executive Order 13166, a U.S. Department of Justice regulation and guidance, as well as HUD's own proposed guidance issued in 2003. All of these documents establish that federal agencies and recipients of their financial assistance must examine the services they provide, identify any need for services to LEP persons and develop and implement a system to provide those services so that LEP persons can meaningfully access them.[3]

To assist grantees that receive direct or indirect HUD funding in carrying out their responsibilities to LEP persons, HUD issued a notice in 2007 titled "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons." This Final LEP Guidance clarifies the compliance standards that grantees must follow to ensure accessibility to LEP persons. Information in appropriate languages must be provided to LEP individuals in order to allow equal access to information, services and programs. Recipients must conduct a four-part analysis and draft a Language Access Plan to determine their obligations to LEP persons and determine the extent and methods of providing information in languages other than English and set forth policies and practices consistent with the Final LEP Guidance.[3]

ADA

In 2010, 18.7 percent of the U.S. civilian non-institutionalized population had a disability, representing 56.7 million people.[4] The Americans with Disabilities Act of 1990 (ADA) ensures that this sizeable part of the population is equally protected. The Act was drafted after years of campaigning by the disability rights movement and a series of legislation with disability protections such as Section 504 of the 1973 Rehabilitation Act, the Civil Rights Restoration Act of 1988, and the Fair Housing Act of 1988.[5] The ADA prohibits discrimination due to a person's disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications. As defined by the ADA, a person with a disability is as someone who has a physical or mental impairment that substantially limits at least one major life activity, a person who has a history of such an impairment, or a person who is perceived by others as having such an impairment. The ADA also protects people who have a relationship or association with an individual with a disability.[6] With respect to housing accessibility, Title II of the ADA applies to housing provided by public entities such as state and local governments. Title III additionally states that public and common use areas at housing developments must be accessible to persons with disabilities.[7]

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[3] New Hampshire Legal Assistance. "Analysis of Impediments to Fair Housing Choice in New Hampshire: 2010 Update." *NHHFA*. 2010. Web. 18 Jan. 2013.
[4] Brault, Matthew. "Americans With Disabilities: 2010." *Census.gov*. U.S. Department of Commerce, U.S. Census Bureau. July 2012. Web. 18 March 2013.
[5] Mayerson, Arlene. "The History of the ADA: A Movement Perspective." *DREDF*. Disability Rights Education and Defense Fund. 1992. Web. 18 March 2013.
[6] U.S. Department of Justice, Civil Rights Division. "A Guide to Disability Rights Laws." *ADA.gov*. July 2009. Web. 18 March 2013.
[7] U.S. Department of Housing and Urban Development. "Accessibility Requirements for Buildings." <http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/accessibilityR>

VAWA

Extensive grassroots efforts in the late 1980s and early 1990s are credited with the development of the Violence Against Women Act (VAWA) of 1994. A variety of advocates and professionals from places such as the battered women's movement, law enforcement officers, and lawyers successfully lobbied Congress to adopt legislation to address domestic and sexual violence. In 2005 VAWA's focus expanded to also include dating violence and stalking. VAWA now incorporates protections into HUD funded housing programs for victims of all these types of crimes. These changes reflect the fact that domestic violence is a significant contributing factor to homelessness, for women especially.[8] In February 2013, Congress renewed VAWA with provisions that expanded these federal protections to include gays, lesbians, transgender individuals, Native Americans, and immigrants as well. VAWA provisions apply to the Public Housing Program, Section 8 Housing Choice Voucher Program, and Project-Based Section 8 Funding Programs. These housing programs may not be allowed to deny housing or evict applicants based on the status of their victimization. Federally subsidized housing providers must notify program participants of VAWA protections. Likewise, Section 8 Housing Choice Voucher Program Administrators must notify participating landlords of their obligations to victims of violence.

STATE LAW

NH Fair Housing Law

New Hampshire provides state-specific fair housing protections as well. The NH Fair Housing Law is found under Title XXXI on Trade and Commerce in Chapter 354-A, the New Hampshire Law Against Discrimination. The Fair Housing Law consists of Revised Statutes Annotated (RSA) 354-A:8 to RSA 354-A:15. The Fair Housing Law declares that equal housing opportunity without discrimination is a civil right. It prohibits housing discrimination on the basis of age, sex, race, creed, color, marital status, familial status, physical or mental disability, national origin, or sexual orientation. The overall Law Against Discrimination also establishes a state agency, the Commission for Human Rights, to eliminate and prevent discrimination in housing accommodations, as well as in employment and public accommodations.[9] Housing discrimination refers to services relating to the business of selling or renting dwellings, including access to and membership in multiple-listing services and brokers' organizations.[10]

Repeal of RSA 130-A:8

RSA 130-A:8 set forth a prohibition on the rental of housing with lead paint hazards to children. In 1997, the New Hampshire Legislature repealed RSA 130-A:8. The statute had stated that rental agents and landlords of housing found by the commissioner of the Department of Health and Human Services or a health authority to have a lead exposure hazard present could not rent that housing if it is to be occupied by a child less than six years of age. Misinterpretation of the section led to rejections of families with children from housing where any lead paint was located, essentially comprising discrimination against families with children. The repeal of RSA 130-A:8 ensured that New Hampshire law better matched federal and state housing discrimination law.

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[8] National Law Center on Homelessness & Poverty. "The impact of the Violence Against Women Act 2005 (VAWA) on the housing rights and options of survivors of domestic and sexual violence." *NCDSV.org*. Web. 18 March 2013. <http://www.ncdsv.org/images/ImpactVAWAHousing-TheProbandRemedy.pdf>

[9] State of New Hampshire. "Title XXXI Trade and Commerce: Chapter 354-A State Commission for Human Rights." *New Hampshire General Court*. Web. 18 March 2013. <http://gencourt.state.nh.us/rsa/html/xxxi/354-a/354-a-mrg.htm>

[10] New Hampshire Commission for Human Rights. "Statute and Rules of the Commission for Human Rights." Web. 18 March 2013. <http://www.nh.gov/hrc/laws.html>

The repeal also follows HUD guidance, which prohibits landlords from discriminating against families with children due to the existence of lead paint in their housing.[11]

Addition of Sexual Orientation as Protected Class

Sexual orientation is an important factor in discrimination. Though few cases of this type of housing discrimination are reported in New Hampshire, hate crimes motivated by sexual orientation bias represent over a quarter of all incidents reported by New Hampshire police departments to the FBI from 2004-2008, and were the second highest category after race.[3] RSA 354-A:8 was adopted in 1997, adding protection from housing discrimination due to a person's sexual orientation to the NH Fair Housing law. This amendment also reaffirmed the opportunity to obtain housing without discrimination due to previously established protected classes of age, sex, race, creed, color, marital status, familial status, physical or mental disability, and national origin. Sexual orientation, as defined by RSA 354-A:2 refers to actual or perceived heterosexuality, bisexuality, or homosexuality.[10] On a federal level, the U.S. Fair Housing Act (FHA) does not yet specifically include sexual orientation and gender identity as prohibited bases. However, according to HUD, a lesbian, gay, bisexual, or transgender (LGBT) person's experience with sexual orientation or gender identity-based housing discrimination may still be covered by other protections in the Act, such as those concerning gender, disability, and allowed considerations in FHA-insured lending.[12]

RSA 354-A:15 – Housing for Older Persons

The Housing for Older Persons section, RSA-A:15, of the Fair Housing Act, is an amendment that disallows that provisions in this chapter regarding familial status or age apply with respect to housing for older persons.[9] Housing for older persons is considered to be one of the following three types of housing:

1. Housing provided under any state or federal program that HUD determines is specifically designed and operated to assist elderly persons as defined in the program;
2. Housing intended for and solely occupied by persons 62 years of age or older; or
3. Housing intended and operated for occupancy by at least one person 55 years of age or older per unit. [11]

Before this amendment was adopted, housing for older persons was exempt only from familial status provisions. This meant that, previously, a qualified housing for older persons provider could legally refuse to rent to a family with children under 18, but not legally refuse to rent to a family with 19-year-olds or anyone else under 55 or 62 years of age. While the adoption of this amendment does allow additional legal discrimination, it is believed that this amendment helps better match the Fair Housing Act with legislative intent because "construing qualified housing for older persons as exempt from familial status but not age provisions would render the exemption meaningless."[13]

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[11] New Hampshire Commission for Human Rights. "Frequently Asked Questions about Exceptions to the N.H. Law Against Housing Discrimination." 12 Oct. 2005. Print.
[12] U.S. Department of Housing and Urban Development. "LGBT Housing Discrimination." *HUD.gov*. Web. 18 March 2013. <http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/LGBT_Housing_Discrimination>
[13] City of Manchester Planning and Community Development Department. "Impediments to Fair Housing Plan: 2010 Update." 2010. Print.

RSA 540:2 – New Tenancy Protections for Victims of Domestic Violence

Data analysis of the New Hampshire Housing Finance Authority (NHHFA)'s 2010 Fair Housing Survey revealed that domestic violence status, among other factors, figured significantly in respondents' perceptions of discrimination and reports of unfavorable housing outcomes. Domestic violence survivors report being denied rental housing, denied a mortgage, and being evicted in higher numbers than those who did not report domestic violence status.[3] RSA 540:2 aims to address discriminatory eviction due to status as a victim of domestic violence. It states that landlords may not terminate a tenancy solely based on a tenant or a household member of a tenant having been a victim of domestic violence, sexual assault, or stalking, with the condition that the victim provides the landlord with written verification that they have obtained a valid protective order against the perpetrator of the domestic violence, sexual assault, or stalking. As determined by definitions in RSA 540:1-a, this statue does not apply to the lessors or owners of: single-family houses if the owner currently owns 3 or fewer single-family houses, rental units in an owner-occupied building containing 4 or fewer dwelling units, and single-family houses acquired by banks or other mortgagees through foreclosure. RSA 540:2 also provides support for sole eviction of the tenant or household member accused of the domestic violence, sexual assault, or stalking, via a court process. The statute does not prevent eviction due to nonpayment of rent.[14]

Civil Rights Act

New Hampshire's Civil Rights Act, or RSA 354-B, was enacted by the Legislature in 1999. This law followed the Human Rights Act and established new protections for the protected classes in that act – race, color, national origin, ancestry, sexual orientation, gender and disability.[13] The Act states that all persons have the right to engage in lawful activities and to exercise and enjoy the rights in and laws of the United States and New Hampshire Constitutions without being subject to actual or threatened physical force or violence or trespass on property when such actual or threatened conduct is due to a bias against a protected class. The Civil Rights Act also gives the New Hampshire Attorney General authority to initiate civil actions on behalf of people for relief against any person believed to have violated the provisions. It also permits civil penalties, injunctive relief necessary to prevent continued or future violations, and restitution for out-of-pocket expenses.[13,15]

Private Right of Action – RSA 354-A:21

RSA 354-A-21, effective as of 2000, sets forth a Procedure on Complaints that allows for expanded options for individuals seeking redress.[9] Before this amendment was passed, individuals alleging violations of the provisions of the New Hampshire Law Against Discrimination were limited to filing complaints with the Human Rights Commission and enforcement through the Attorney General's office. Adding upon extensive enforcement provisions concerning complaints before the Human Rights Commission, enforcement provisions established in RSA 354-A:21 allow an aggrieved individual to file a complaint in court. Parties alleging to be aggrieved by practices prohibited by RSA 354-A may bring an action in superior court for civil damages and/or injunctive relief. This provision "not only allows an individual to choose where he or she will seek relief for an alleged discriminatory act, but also allows him or her to seek remedies for alleged violations of other laws before a body which has jurisdiction to consider all claims."[13]

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[14] State of New Hampshire. "Title LV Proceedings In Special Cases: Chapter 540. Actions Against Tenants." *New Hampshire General Court*. Web. 18 March 2013. <http://www.gencourt.state.nh.us/rsa/html/LV/540/540-mrg.htm>

[15] State of New Hampshire. "Title XXXI Trade and Commerce: Chapter 354-B Civil Rights Act." *New Hampshire General Court*. Web. 18 March 2013. <http://gencourt.state.nh.us/rsa/html/xxxi/354-b/354-b-mrg.htm>

Statewide Building Code

New Hampshire's first statewide building code, effective as of 2002, was created by RSA 155-A. The Code represented a way to standardize and modernize the pre-existing, varying local codes that were in use, in order to better serve the interests of public health, safety and welfare.[13] The Code adds to the pre-existing state-wide requirements of the State Fire Code and the New Hampshire Barrier Free Design Code by adopting International Building Code 2009, International Energy Conservation Code 2009, International Existing Building Code 2009, International Mechanical Code 2009, International Plumbing Code 2009, International Residential Code 2009, National Electrical Code 2011, and State Fire Code Saf-C 6000.[16] In addition, the Code provides the Life Safety Code with precedence for requirements in regard to means of egress. While the Code supersedes all local codes that are less stringent, municipalities have freedom to adopt more restrictive codes if desired. RSA 155-A applies to all new buildings constructed by the state or a state agency, as well as all new public buildings in New Hampshire. According to the statute, public buildings are all buildings into which the general public is allowed entry as a normal part of the building's operation and use. Residential buildings such as apartment buildings and shelters are examples of buildings considered to be public and which must comply with the Code, while residential buildings such as one and two family dwellings are not considered public and are exempted from the Code requirements.[13, 17]

The Code for (Architectural) Barrier Free Design (AB Code) for the State of New Hampshire is especially relevant to fair housing. Effective as of 2008,[18] the AB Code originates from RSA 275-C:11, which established a Committee on Architectural Barrier-Free Design (Abfd).[19] The Committee is a permanent committee of the Governor's Commission on Disability, and is responsible for the AB Code. The Committee's Chapter Abfd 300, Code For Barrier-Free Design, states that its purpose is to ensure, through the elimination of architectural barriers, that publicly funded public buildings and facilities are accessible to, and functional for, persons with disabilities. It names the 2010 ADA Standards for Accessible Design (as clarified or modified by Abfd 303.02) as the source of the provisions of the AB Code.[20] The AB Code incorporates by reference the International Building Code 2006 and Accessible and Usable Buildings and Facilities ANSI A117.1-2003.[18]

Workforce Housing Law

In 2008, RSA 674:58-61established New Hampshire's Workforce Housing Law, which mandates communities to provide workforce housing. Workforce housing is defined as housing opportunities that are affordable for moderate and low-income families, including rental multi-family housing. [3,21] The Workforce Housing law follows fair housing New Hampshire Supreme Court precedent by codifying the 1991 case of *Britton v. Town of Chester*, 134 N.H. 434. In the *Britton* case, the Court ruled that "all New Hampshire municipalities have an obligation to afford reasonable opportunities for the development of housing for low and moderate income families, including fair share of the regional need for such housing." Unfortunately, in the subsequent years,

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[16] New Hampshire Department of Safety. "NH State Building Code (Current)." Web. 18 March 2013. <http://www.nh.gov/safety/boardsandcommissions/bldgcode/nhstatebldgcode.html>

[17] New Hampshire General Court. "Title XII Public Safety And Welfare: Chapter 155-A New Hampshire Building Code." Web. 18 March 2013. <http://www.gencourt.state.nh.us/rsa/html/XII/155-A/155-A-mrg.htm>

[18] New Hampshire Governor's Commission on Disability. "Accessibility Codes that Apply in New Hampshire Updated August 2010." Web. 18 March 2013. <http://www.nh.gov/disability/information/architectural/documents/nh_accessibility_codes.pdf>

[19] New Hampshire General Court. "Title XXIII Labor: Chapter 275-C Governor's Commission On Disability." Web. 18 March 2013. <http://www.gencourt.state.nh.us/rsa/html/XXIII/275-C/275-c-mrg.htm>

[20] Architectural Barrier-Free Design Committee. "Chapter Abfd 100-300." Web. 18 March 2013. <http://www.gencourt.state.nh.us/rules/state_agencies/abfd100-300.html>

[21] State of New Hampshire. "Title LXIV Planning And Zoning: Chapter 674 Local Land Use Planning And Regulatory Powers." *New Hampshire General Court*. Web. 18 March 2013. <http://www.gencourt.state.nh.us/rsa/html/lxiv/674/674-mrg.htm>

most municipalities disregarded their responsibilities under Britton, with significant effects upon families with children. The new Workforce Housing sections of Chapter 674 on Local Land Use Planning and Regulatory Powers now again mandate, this time via statute, that local governments provide meaningful opportunities for the development of affordable housing for moderate and low-income families.[3] In Manchester, many working class residents are in need of affordable workforce housing, including entry level teachers, firefighters, police officers, artists, nursing assistants and medical workers, hospitality employees, retail and service employees.[13]

Protection for Homeowners Against Predatory Foreclosure Schemes

In 2007, new laws concerning Chapter 479 on Mortgages of Realty were passed in New Hampshire, regulating foreclosure consultants and pre-foreclosure conveyances in order to protect homeowners from predatory foreclosure schemes.[22] In the past few years many homeowners facing foreclosure, especially low-income and unsophisticated borrowers, were preyed upon by foreclosure "prevention" schemers even as the same predatory and unethical lending practices helped drive the U.S. housing crisis. The Analysis of Impediments to Fair Housing Choice in New Hampshire 2010 Update noted that members of many protected class groups were specially targeted. Schemes included "charging high fees for offers to intervene with foreclosing lenders or for referrals to bankruptcy attorneys; situations where the homeowner believes he or she is refinancing but unknowingly transfers ownership of her home to another party; and lease/buyback deals with terms that all but ensure that the homeowner will never be able to regain title to his home." The new RSA 479 statutes importantly require that a foreclosure contract be implemented before services are provided. This contract must fully disclose and describe the terms, services to be provided, and costs of the contract; be notarized; and be accompanied by a notice of the right to cancel the contract. Requirements that aim to eliminate unknowing loss of homeownership are established as well. The statutes also provide specific protection of persons with limited English proficiency (LEP persons) by establishing that contracts for LEP persons must be written in their language.[3]

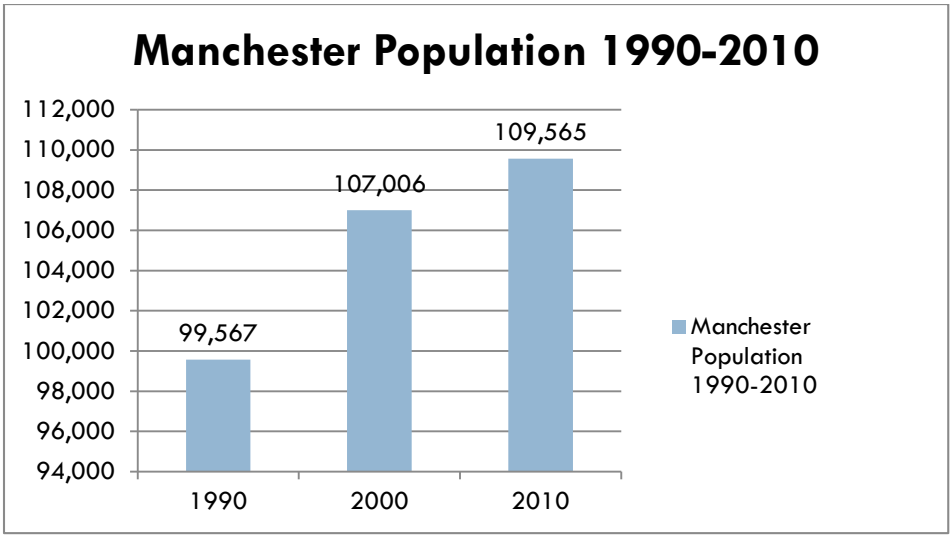
[22] State of New Hampshire. "Title XLVIII Conveyances and Mortgages of Realty: Chapter 479 Mortgages of Realty." New Hampshire General Court. Web. 19 March 2013. <http://www.gencourt.state.nh.us/rsa/html/XLVIII/479/479-mrg.htm>

II. DEMOGRAPHIC INFORMATION

POPULATION TRENDS

The City of Manchester is the State of New Hampshire's largest City, with a population of 109,565 according to the 2010 U.S. Census. This is up 2.4 percent from 2000 where the population was 107,006 and approximately 10 percent from the 1990 population of 99,567. The latest population estimate for the City of Manchester is up to 109,830 for 2011.[23]

Figure 1 – 1990-2010 Population, City of Manchester, NH



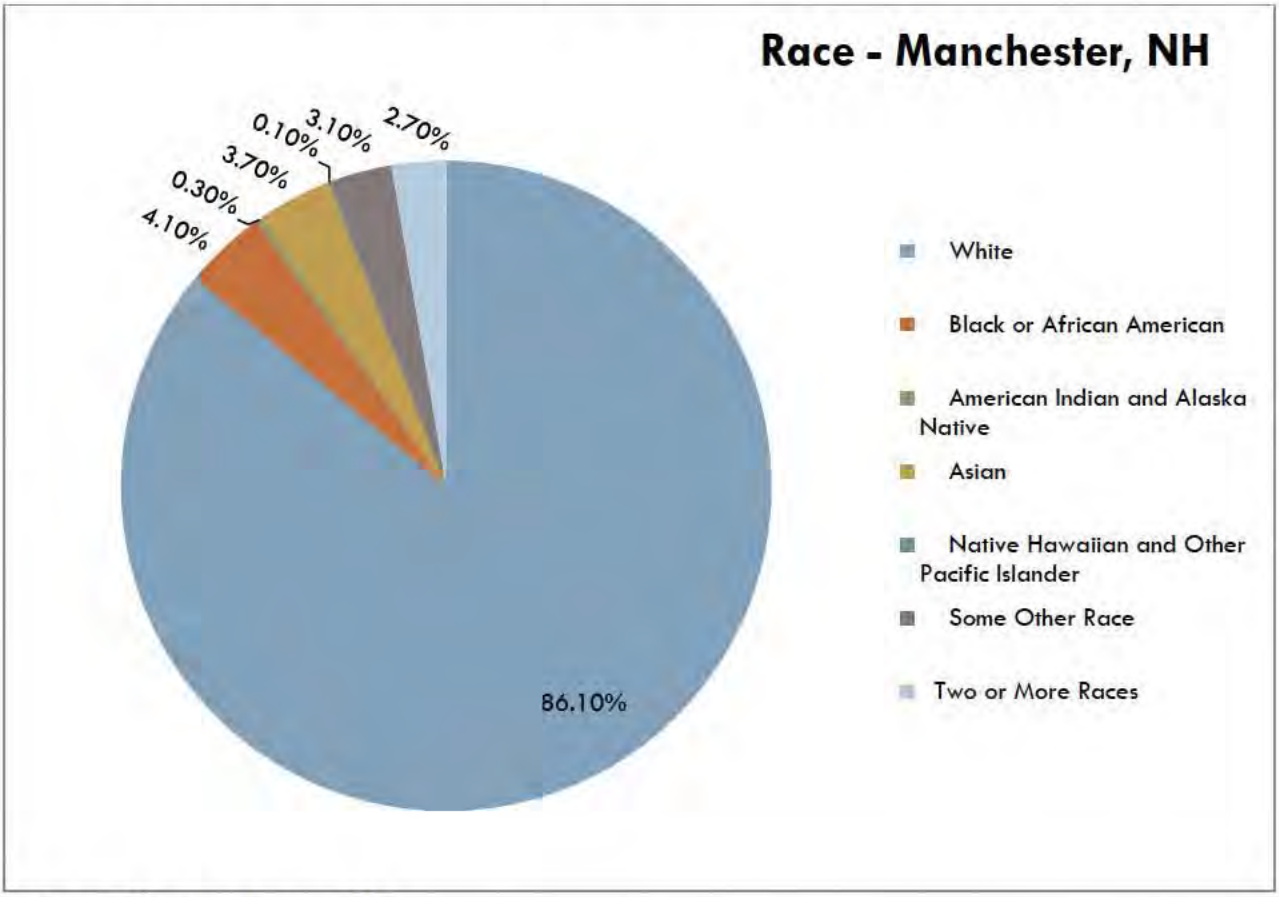
Source: U.S. Census Bureau. Census 2010.

The City of Manchester has 3,136.8 persons per square mile, resulting in the highest population density in the State of New Hampshire. The City is comprised of 33.1 square miles of land area with an inland water area of 1.9 square miles.

While Whites still represented 86.1 percent of the population in 2010, the minority population is growing. The Black or African American population grew from 2.1 percent in 2000 to 4.1 percent in 2010. The Asian population grew from 2.3 percent in 2000 to 3.7 percent in 2010. The Native Hawaiian and other Pacific Islander population stayed the same at 0.10 percent and the American Indian and Alaska Native population stayed the same from 2000 to 2010 at 0.3 percent. The Hispanic or Latino (of any race) population grew from 4.6 percent in 2000 to 8.1 percent in 2010.

[23] U.S. Census Bureau, Population Division. "Table 3. Annual Estimates of the Resident Population for Incorporated Places in New Hampshire: April 1, 2010 to July 1, 2011 (SUB-EST2011-03-33)." June 2012. Web. 1 March 2013.

Figure 2 – 2010 City of Manchester, NH Race Profile



Source: U.S. Census Bureau, 2010.

The foreign born population of the City of Manchester is 12,956 as of the latest estimate from the U.S. Census Bureau.[24] This is almost 12 percent of the City's population and more than twice the percent of people in the State of New Hampshire who are foreign born. Almost 19 percent of the residents of Manchester, age 5 years and older, speak a language other than English as their primary language at home and close to 8 percent of those residents speak English less than "very well" or are considered linguistically isolated. The population in the City of Manchester with a disability in 2010 was 13,872.[25]

[24] U.S. Census Bureau. "2007-2011 American Community Survey 5-Year Estimates." <http://factfinder2.census.gov>
[25] U.S. Census Bureau. "Census 2010." <http://factfinder2.census.gov>

INCOME AND EMPLOYMENT

Annual covered employment[26] in the City of Manchester rose 13.49 percent from 1990 to 2000, from a total of 58,863 to 66,804. From 2000 to 2012 employment declined by 3.34 percent, as a result of the Great Recession, which started to take effect in the mid-2000's. Looking long-term, employment rose 9.70 percent from 1990 to 2012 in the City of Manchester. The most recent labor force estimate for the City of Manchester was 61,990 in December 2012, with an unemployment rate of 6 percent.

Table 1 – 1990-2012 Annual Covered Employment, City of Manchester, NH

Municipality	1990			2000			2012*		
	Private Sector	Govern-ment	Total	Private Sector	Govern-ment	Total	Private Sector	Govern-ment	Total
Manchester	52,178	6,685	58,863	59,386	7,418	66,804	57,338	7,232	64,570

Source: New Hampshire Employment Security Data and Statistics.
*Data reflects the 2nd quarter of 2012 as annual average data is not yet available

Table 2 – 1990-2012 Annual Covered Employment Change, City of Manchester, NH

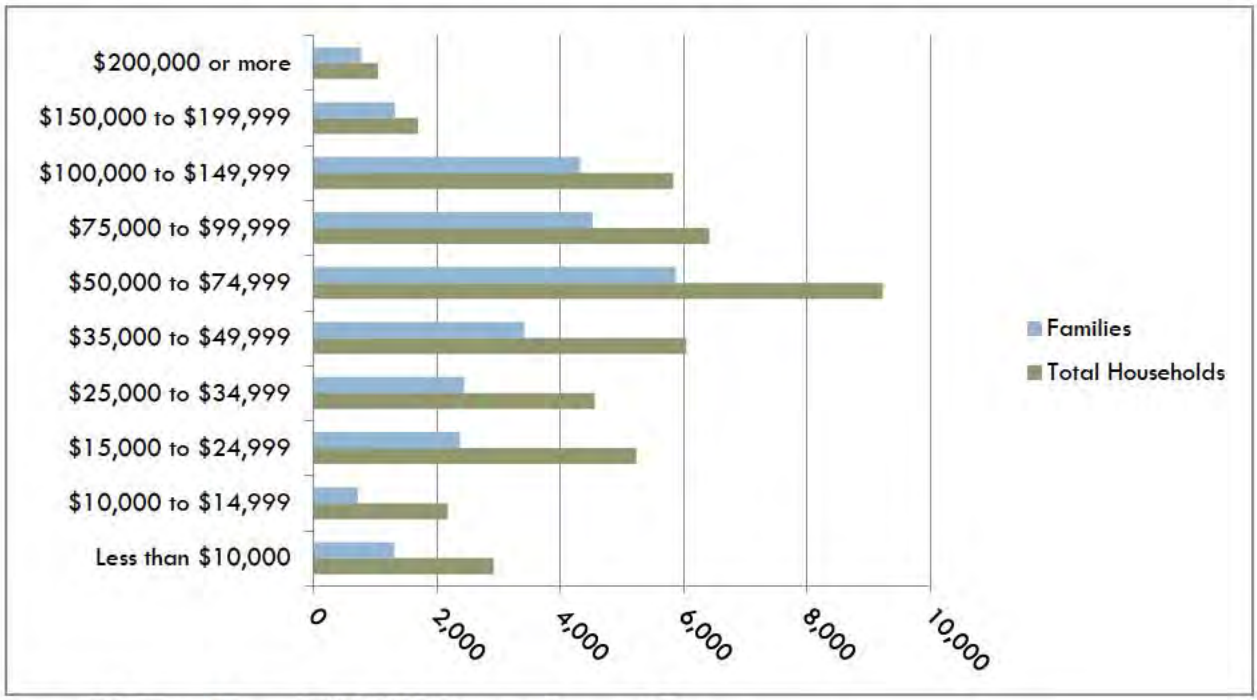
Percent Change		
1990-2000	2000-2012	1990-2012
13.49%	-3.34%	9.70%

Source: New Hampshire Employment Security Data and Statistics.

Median Household Income in the City of Manchester was $53,278 in 2011, which is a 30.6 percent increase from 2000. This compares to the State of New Hampshire at $64,664.[24] Median Family Income in the City of Manchester was $65,137.[24] Median earnings for male full-time, year-round workers in 2011 were $47,124 and for female full-time, year-round workers it was $37,540. Just over 5 percent of households in the City of Manchester receive supplemental security income. 4.8 percent of households receive cash public assistance income and 12.3 percent of households received food stamps/SNAP benefits in 2011.

[26] NH Employment Security. "Quarterly Census of Employment and Wages." *Data & Statistics*. 2nd Quarter 2012. Web. March 2013.

Figure 3 – 2011 Family and Household Income, City of Manchester, NH



Source: U.S. Census Bureau, 2007-2011 American Community Survey.

Median Household Income differences by race are outlined in Table 3[27] (next page), along with poverty rates for all individuals. Median Household Incomes are lower in the City of Manchester than State Median Household Incomes and poverty rates are higher. Median Income for Asian and White households is significantly higher than Black / African American, Other races, Two or more races and Hispanic households. Asian households have the highest median income at $62, 963 for the City of Manchester and $73,495 for the State of New Hampshire. Median Household Income for Black / African American, Other races, Two or more races and Hispanic households fall within the very low income limits (50 percent of the Median Family Income) of The U.S Department of Housing and Urban Development (HUD) State Income Limits defined for FY 2013.[28]

[27] U.S. Census Bureau. "2006-2010 American Community Survey 5-Year Estimates." *Census.gov*. Web. 12 March 2013. <http://factfinder2.census.gov>

[28] U.S Dept. of Housing and Urban Development. "State Income Limits and Median Family Incomes for FY2013." *Census.gov*. Web. 12 March 2013. See Appendix A.

Table 3 – 2010 Median Household Income and Poverty Rate by Race

	Median Household Income	Poverty Rate*
Manchester, NH	$53,377	13.2%
White alone	$54,559	11.8%
Black or African American alone	$35,420	30.5%
Am Indian/ Alaska Native	N/A	N/A
Asian alone	$62,963	16.7%
Some other race alone	$40,018	21.1%
Two or more races	$32,768	29.1%
Hispanic (of any race)	$37,479	21.1%
NH-Statewide	$63,277	7.8%
White alone	$63,340	7.4%
Black or African American alone	$47,638	24.2%
Am Indian/ Alaska Native	$53,571	16.2%
Asian alone	$73,495	9.4%
Some other race alone	$44,407	17.5%
Two or more races	$55,188	12.3%
Hispanic (of any race)	$51,336	15.8%

Source: 2006-2010 American Community Survey.
*All Individuals

The Black / African American poverty rate is significantly higher in both Manchester and the State of New Hampshire than any other race at 30.5 percent in the City and 24.2 percent in the State. The poverty rate for two or more races and the Hispanic populations in the City are also significant at 29.1 percent and 21.1 percent respectively.

The foreign-born poverty rate for the City of Manchester was just over one percent from the latest estimates, compared to the State at 0.39 percent. Manchester has 22.7 percent of the State's foreign-born population in poverty.[29] There are 13,872 individuals living with a disability in the City of Manchester, which is close to 13 percent of the total population. Of those individuals with a disability, almost 30 percent are living in poverty.[30]

[29] U.S. Census Bureau. "2006-2008 American Community Survey 3-Year Estimates." *Census.gov*. Web. 12 March 2013. <http://factfinder2.census.gov>

[30] U.S. Census Bureau. "2011 American Community Survey 1-Year Estimates." *Census.gov*. Web. 12 March 2013.

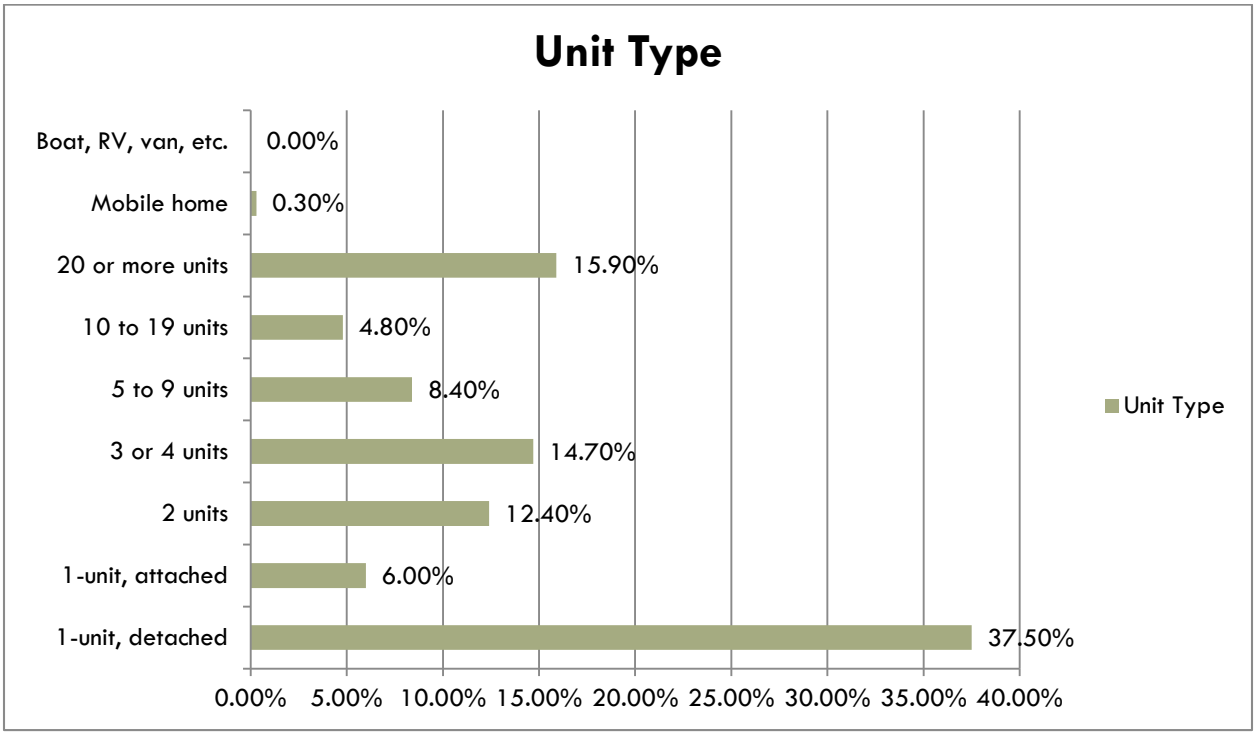
III. FAIR HOUSING PROFILE

The City of Manchester has 45,766 total households, of which 13,234 have individuals under 18 years old. Family households are 57 percent of the total households, or 26,066. Average household size is 2.34 and average family size is 2.99.

Total housing units in the City of Manchester are 49,288, with occupied housing units totaling 45,766 and vacant housing units totaling 3,522. Owner-occupied housing units total 21,661 and renter-occupied housing units total 24,105. From the 2010 Census, the homeowner vacancy rate was 1.8 percent and the rental vacancy rate was 8.3 percent.

The majority of the housing units in the City of Manchester are single-family detached. The second largest housing type is the 20+ unit multi-family structure and just behind that the three to four unit multi-family structure.

Figure 4 – 2011 Housing Units by Type, City of Manchester, NH



Source: U.S. Census Bureau, 2007-2011 American Community Survey.

White households and Asian households have the highest homeownership rates in the City of Manchester, at 49.53 percent and 39.97 percent, respectively. Native Hawaiian/ Pacific Islander households have the lowest homeownership rates in the City at 10 percent and other races in the City had a similarly low homeownership rate at 17.10 percent. Black households, American Indian/ Alaska Native households, those with two or more races and Hispanic households have homeownership rates in the 21 – 28 percent range.

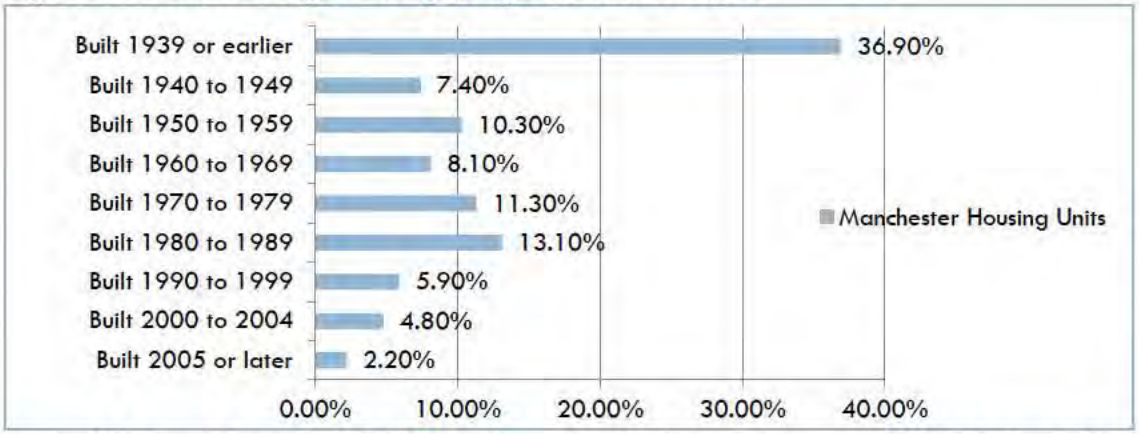
Table 4 – 2010 Homeownership Rates, City of Manchester, NH

	White	Percent Total	Black / African American	Percent Total	AIAN	Percent Total	Asian	Percent Total	Native Hawaiian / Pacific Islander	Percent Total	Other Race	Percent Total	Two or More Races	Percent Total	Hispanic	Percent Total
Owner-	20,489	49.53%	309	21.71%	32	24.81%	486	39.97%	2	10.00%	163	17.10%	180	27.40%	1747	22.53%
Renter-	20,879	50.47%	1,114	78.29%	97	75.19%	730	60.03%	18	90.00%	790	82.90%	477	72.60%	6,008	77.47%
Total	41,368		1,423		129		1,216		20		953		657		7,755	

Source: U.S. Bureau of the Census, Census 2010 (H14, H11H).

The City of Manchester has a significant portion of older housing stock as can be seen depicted in the following graph. The bulk of the housing stock in the City was built 1939 or earlier and more than half was built more than 40 years ago.

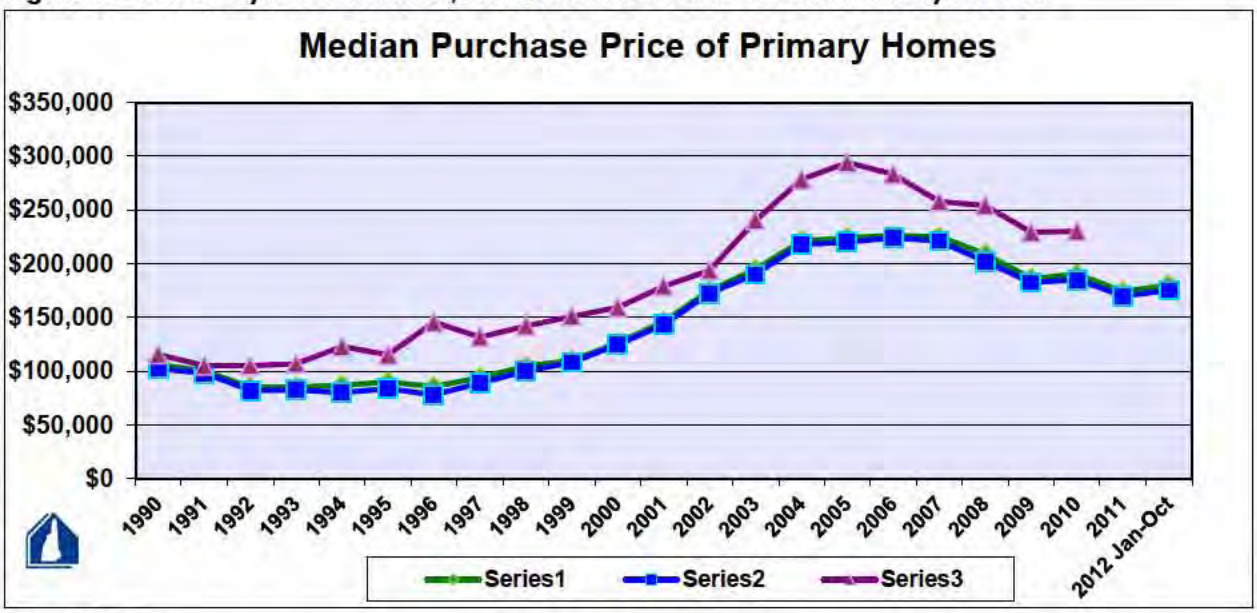
Figure 5 – 2011 Housing Stock Age, City of Manchester, NH



Source: U.S. Census Bureau. "2007-2011 American Community Survey." *Census.gov*. Web. 13 March 2013.

The median purchase price of primary homes in the City of Manchester for Jan-Oct 2012 was $180,000. This is down from a high in the past 22 years of $226,000 in 2006.[31]

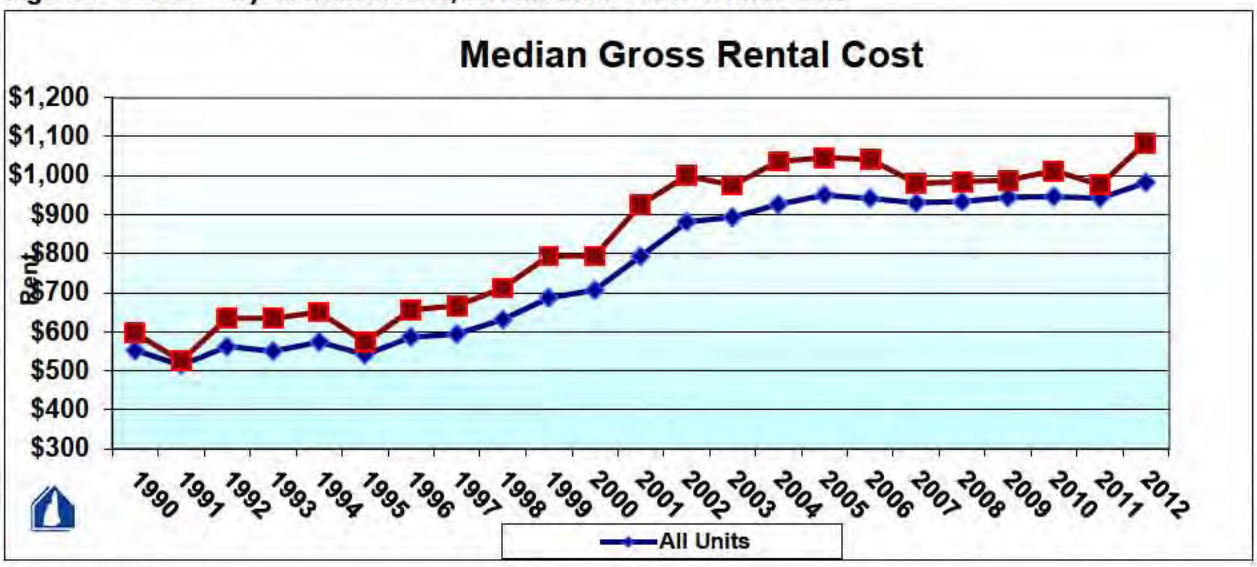
Figure 6 – 2012 City of Manchester, NH Median Purchase Price of Primary Homes



Source: NHHFA.

The median gross rental cost for all units in the City of Manchester for 2012 was $982. This is the highest it has been in the past 22 years.[32] For a typical 2-bedroom unit the gross rental cost for 2012 was $1,084.

Figure 7 – 2012 City of Manchester, NH Median Gross Rental Cost



Source: NHHFA.

[31] NH Dept. of Revenue. "PA-34 Dataset." Compiled by Real Data Corp. Filtered and analyzed by New Hampshire Housing. Web. 13 March 2013.
[32] NHHFA. "2012 Residential Rental Cost Survey." Web. 13 March 2013.

Close to 43 percent of the households in the City of Manchester have a housing cost burden of greater than 30 percent of income.[33] "Estimates indicate that the number of Black Manchester renter households facing a "housing cost burden" of a monthly rent at or above 30% of "median area income" (MAI) may be almost two-thirds of the Black population in Manchester."[3]For Latino and White, non-Latino households, close to 50 percent have a housing cost burden at or above 30 percent of the MAI. New Hampshire ranks as the twelfth most expensive state in the nation for the wage needed to afford a 2-bedroom unit at fair market rent to be affordable. In 2013, the wage needed to afford a 2-bedroom unit at fair market rent, without paying more than 30 percent of income, is $20.47/hour or $42,578/year.[35]

The following housing needs have been identified as problems cited in the City according to HUD's Comprehensive Housing Affordability Strategy data:

- Substandard Housing - Lacking complete plumbing or kitchen facilities
- Severely Overcrowded - With less than 1.51 people per room (and complete kitchen and plumbing)
- Overcrowded - With 1.01-1.5 people per room (and none of the above problems)
- Housing cost burden greater than 50 percent of income (and none of the above problems)
- Housing cost burden greater than 30 percent of income (and none of the above problems)
- Zero/negative Income (and none of the above problems)

Almost 43 percent of the households in Manchester (owner and renter) have one of these housing needs. For rental units, almost half have a housing need and for owner-occupied units, slightly less than 43 percent have a housing need listed above.[36]

[33] U.S. Census Bureau. "2005-2009 American Community Survey 5-Year Estimates." C*ensus.gov*. Web. 13 March 2013.
[35] National Low Income Housing Coalition. "Out of Reach 2013." March 2013. Print.
[36] U.S. Department of Housing and Urban Development. "2005-2009 Comprehensive Housing Affordability Strategy Data." See Appendix A

IV. RESIDENTIAL SEGREGATION, ASSISTED HOUSING AND LAND USE PRACTICES

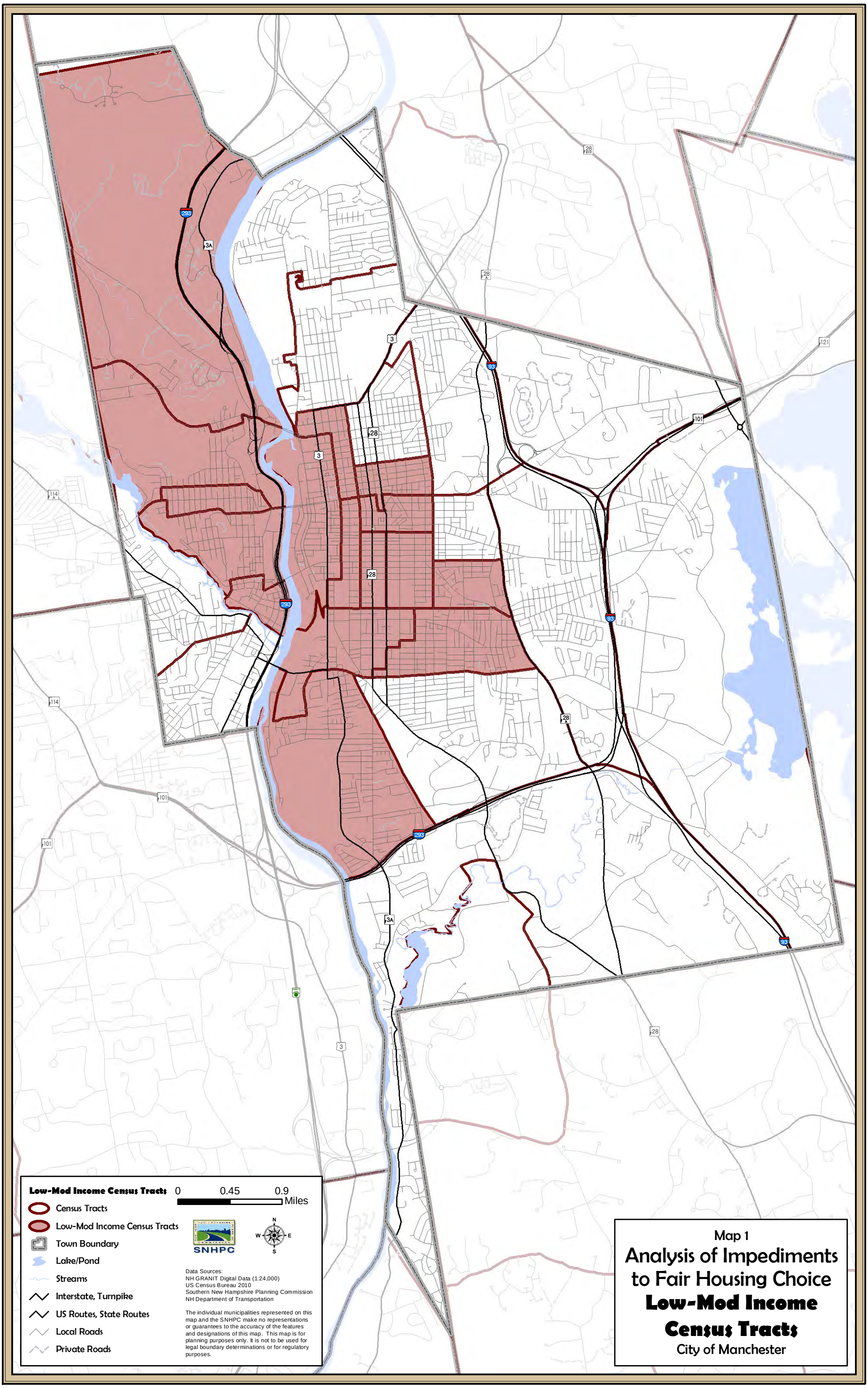
RESIDENTIAL SEGREGATION PATTERNS

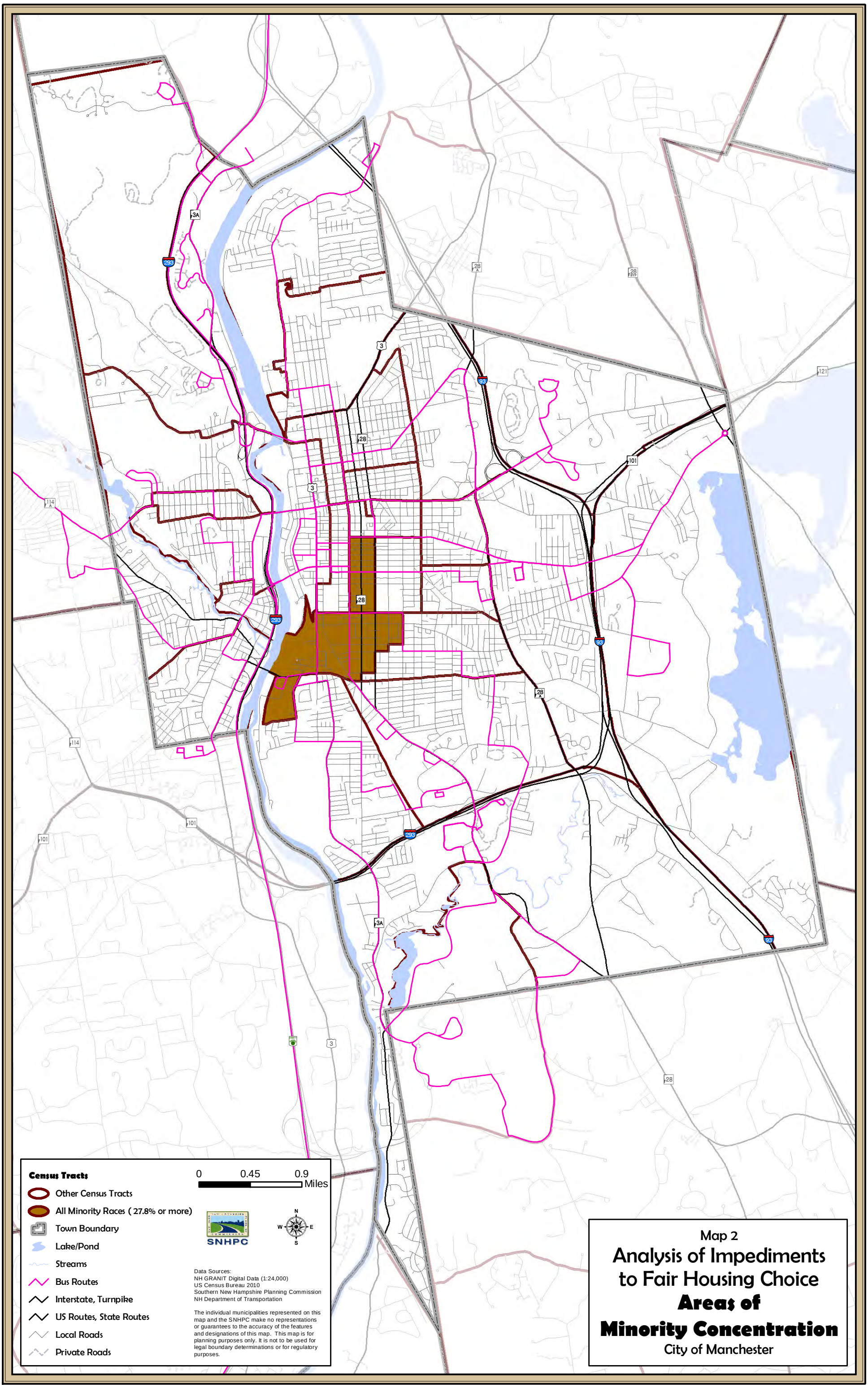
The following maps illustrate residential segregation patterns that exist in the City of Manchester. Map 1 illustrates areas of low-moderate income census tracts; those where at least 50 percent of the households have 80 percent or less of the HUD-defined Area Median Family Income. Map 2 illustrates areas of minority concentration in the City of Manchester. For this study, an area of racial concentration is defined as one where the percentage of a specific race in a census tract is double or more what the City's overall total percentage is for that race. Individual racial concentrations are illustrated on maps 3 through 7.

Map 8 illustrates the areas in the City where areas of minority concentration overlap with concentrations of low-moderate income households.

"Almost 30 percent of the Black population of New Hampshire resides in Manchester."[34] Within the City, the areas of minority concentration are completely contained within the areas of low-moderate income concentration, as well as areas with high levels of poverty (15.8 percent and above), as illustrated on Map 9. In addition, "slightly over 50 percent of New Hampshire's Blacks living in poverty reside in Manchester."[34]

Impediments that create barriers to fair housing choice and play a role in the residential segregation patterns that exist in the City are outlined in Section VIII.


Low-Mod Income Census Tracts
0
0.45
0.9
Miles
Census Tracts
Low-Mod Income Census Tracts
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
The individual municipalities represented on this map and the SNHPC make no representations or guarantees to the accuracy of the features and designations of this map. This map is for planning purposes only. It is not to be used for legal boundary determinations or for regulatory purposes.
Map 1
Analysis of Impediments to Fair Housing Choice
Low-Mod Income Census Tracts
City of Manchester


Census Tracts
Other Census Tracts
All Minority Races (27.8% or more)
Town Boundary
Lake/Pond
Streams
Bus Routes
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.45
0.9
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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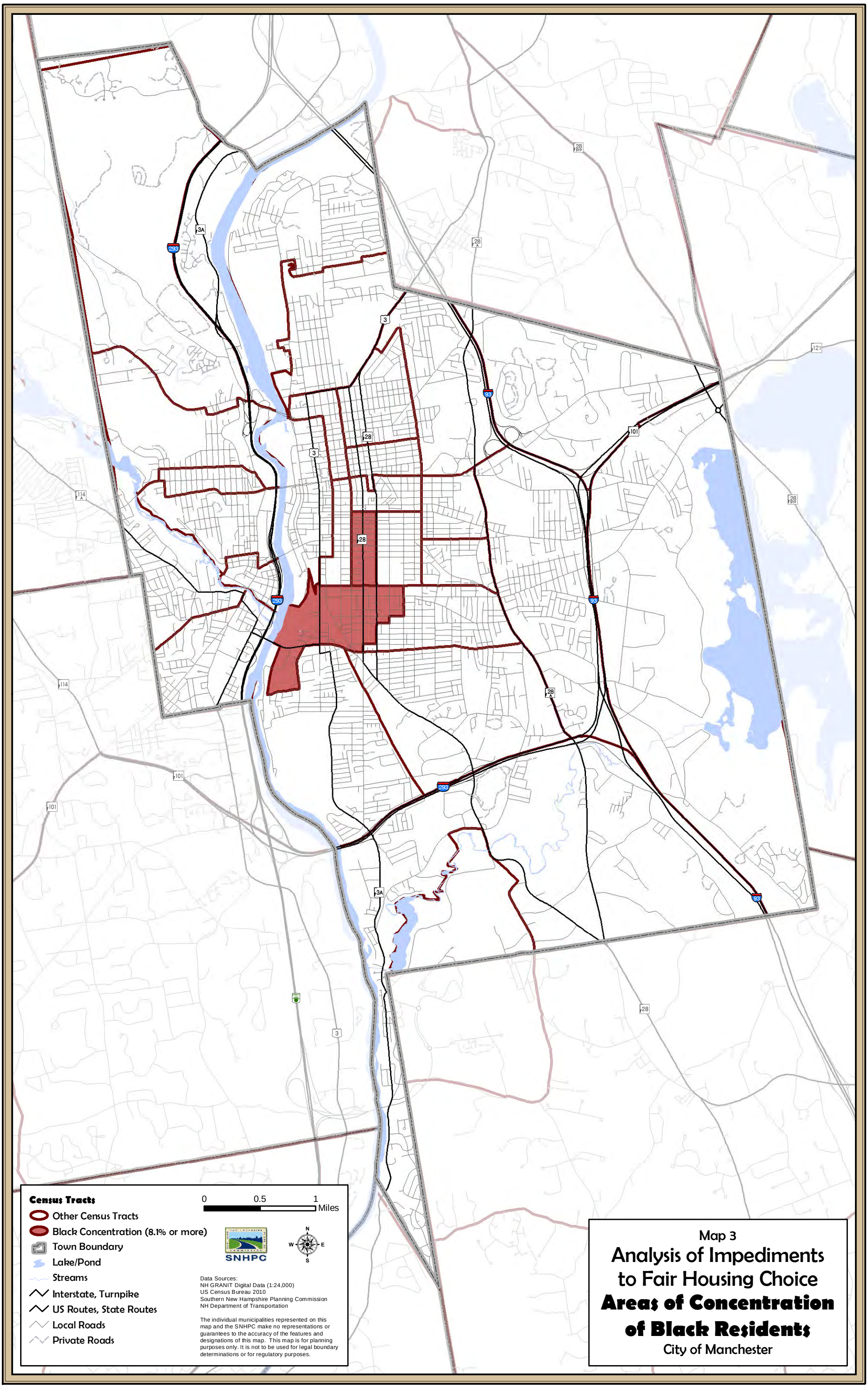
Map 2
Analysis of Impediments to Fair Housing Choice
Areas of Minority Concentration
City of Manchester


Census Tracts
Other Census Tracts
Black Concentration (8.1% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.5
1
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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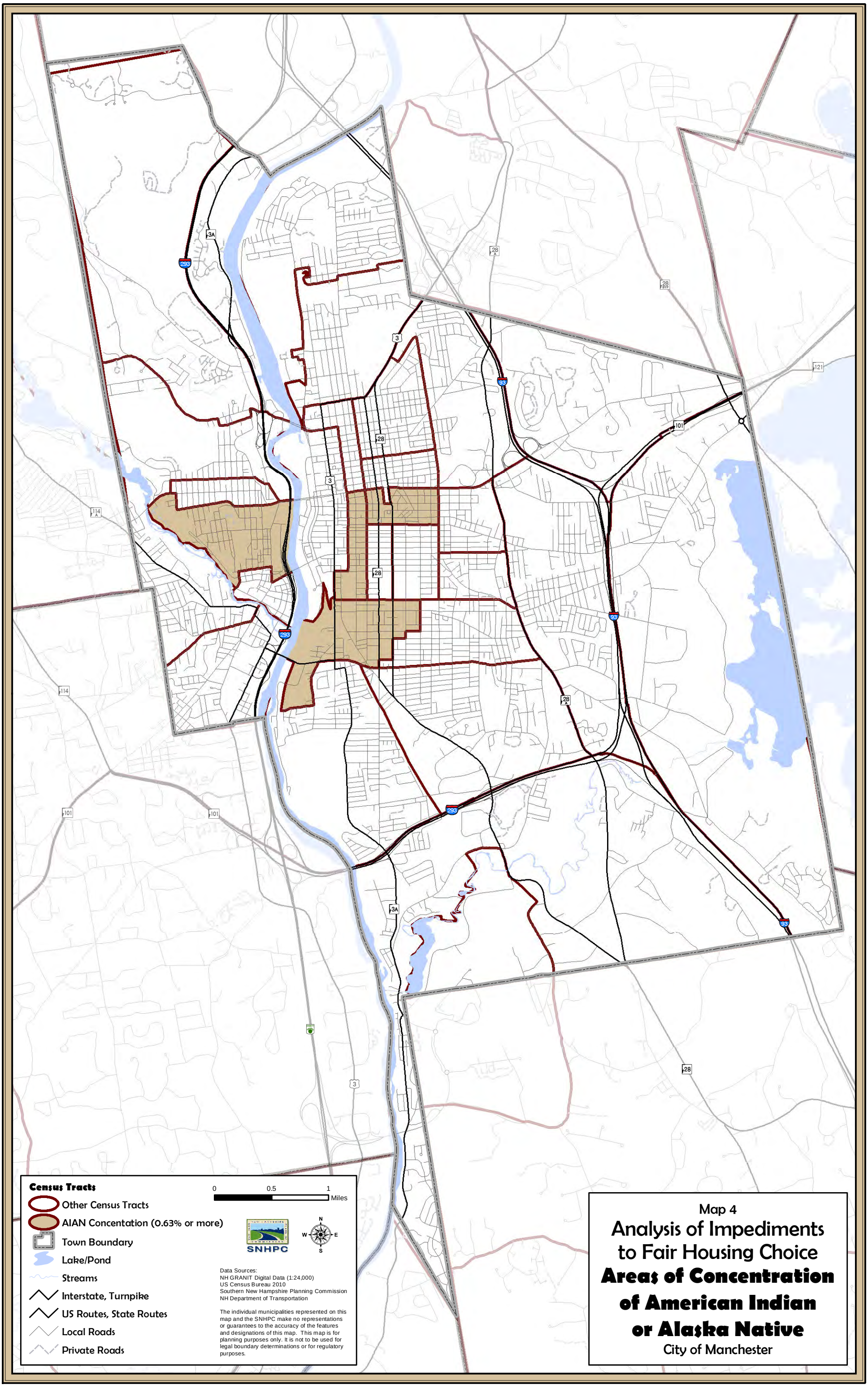
Map 3
Analysis of Impediments to Fair Housing Choice
Areas of Concentration of Black Residents
City of Manchester


Census Tracts
Other Census Tracts
AIAN Concentation (0.63% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.5
1
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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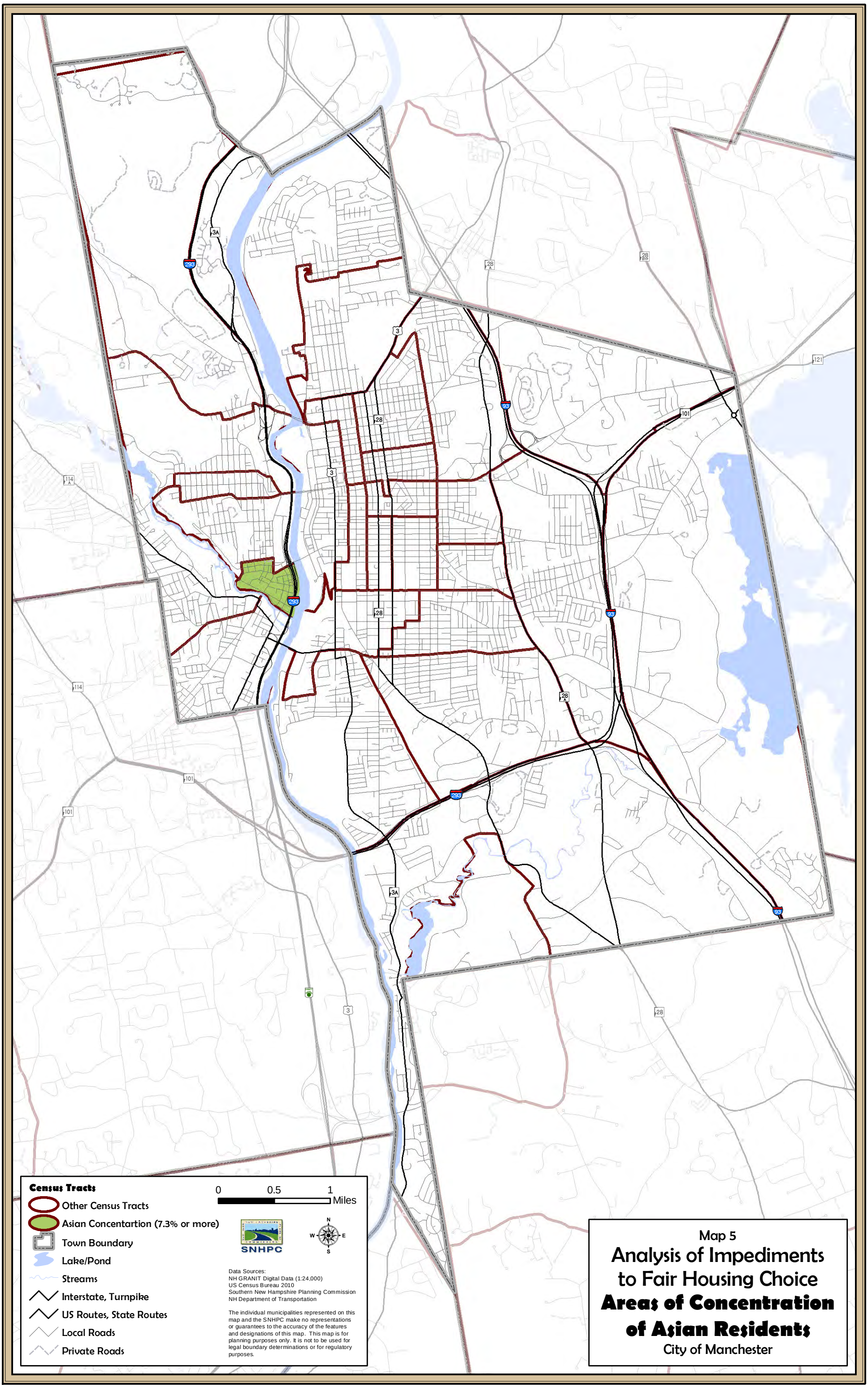
Map 4
Analysis of Impediments to Fair Housing Choice
Areas of Concentration of American Indian or Alaska Native
City of Manchester


Census Tracts
Other Census Tracts
Asian Concentartion (7.3% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.5
1
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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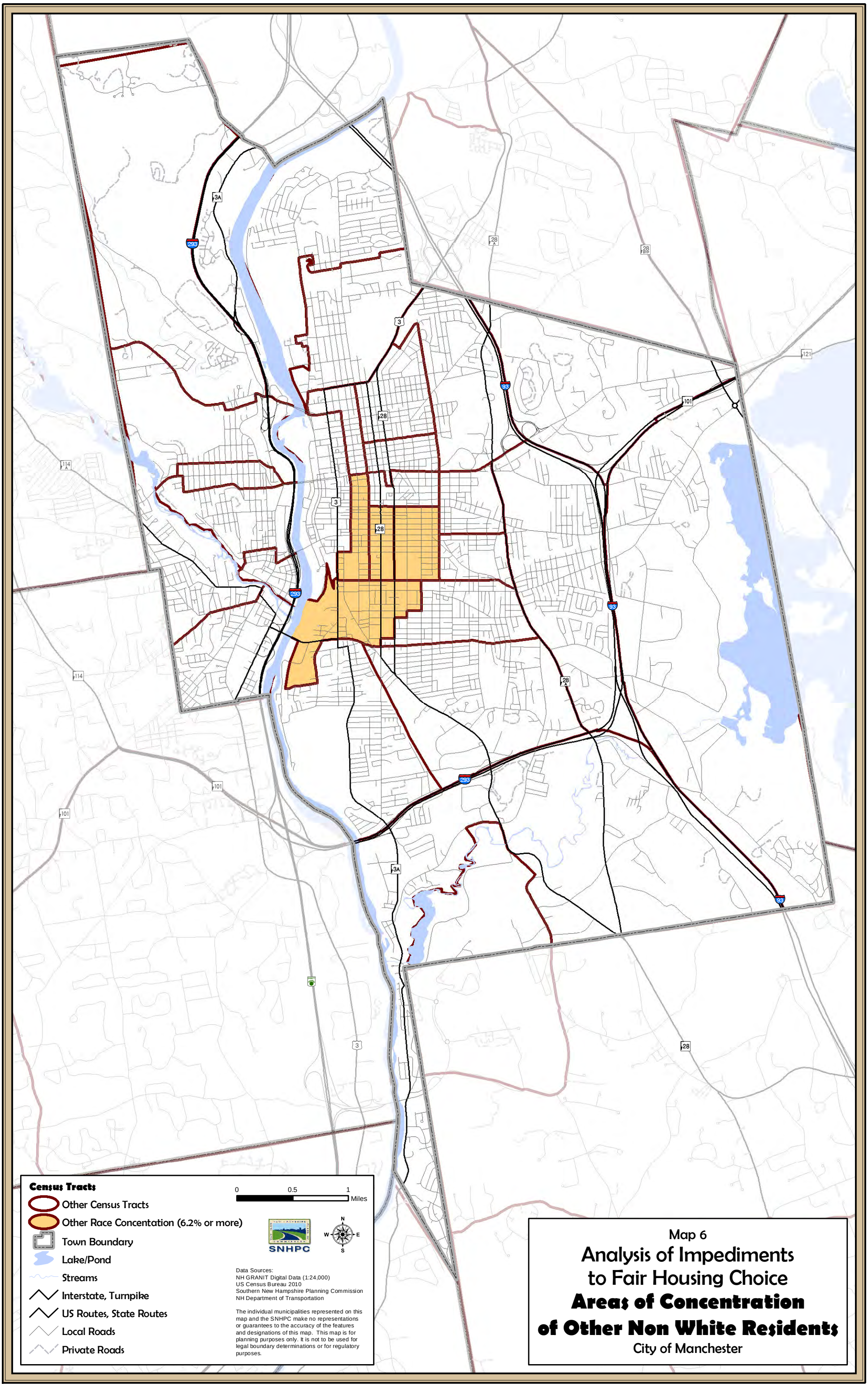
Map 5
Analysis of Impediments to Fair Housing Choice
Areas of Concentration of Asian Residents
City of Manchester


Census Tracts
Other Census Tracts
Other Race Concentation (6.2% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.5
1
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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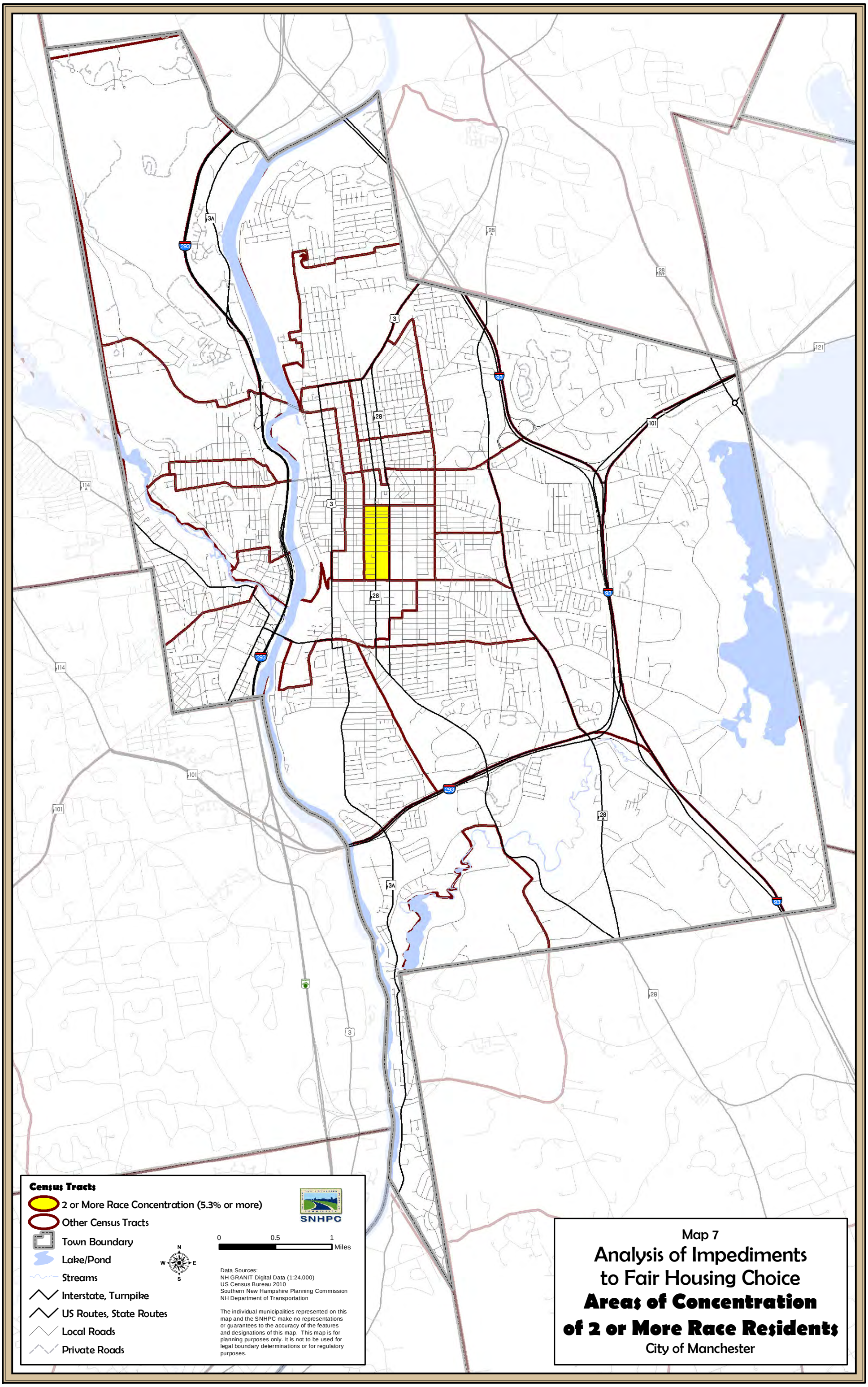
Map 6
Analysis of Impediments to Fair Housing Choice
Areas of Concentration of Other Non White Residents
City of Manchester


Census Tracts
2 or More Race Concentration (5.3% or more)
Other Census Tracts
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
N
W
E
S
0
0.5
1
Miles
SNHPC
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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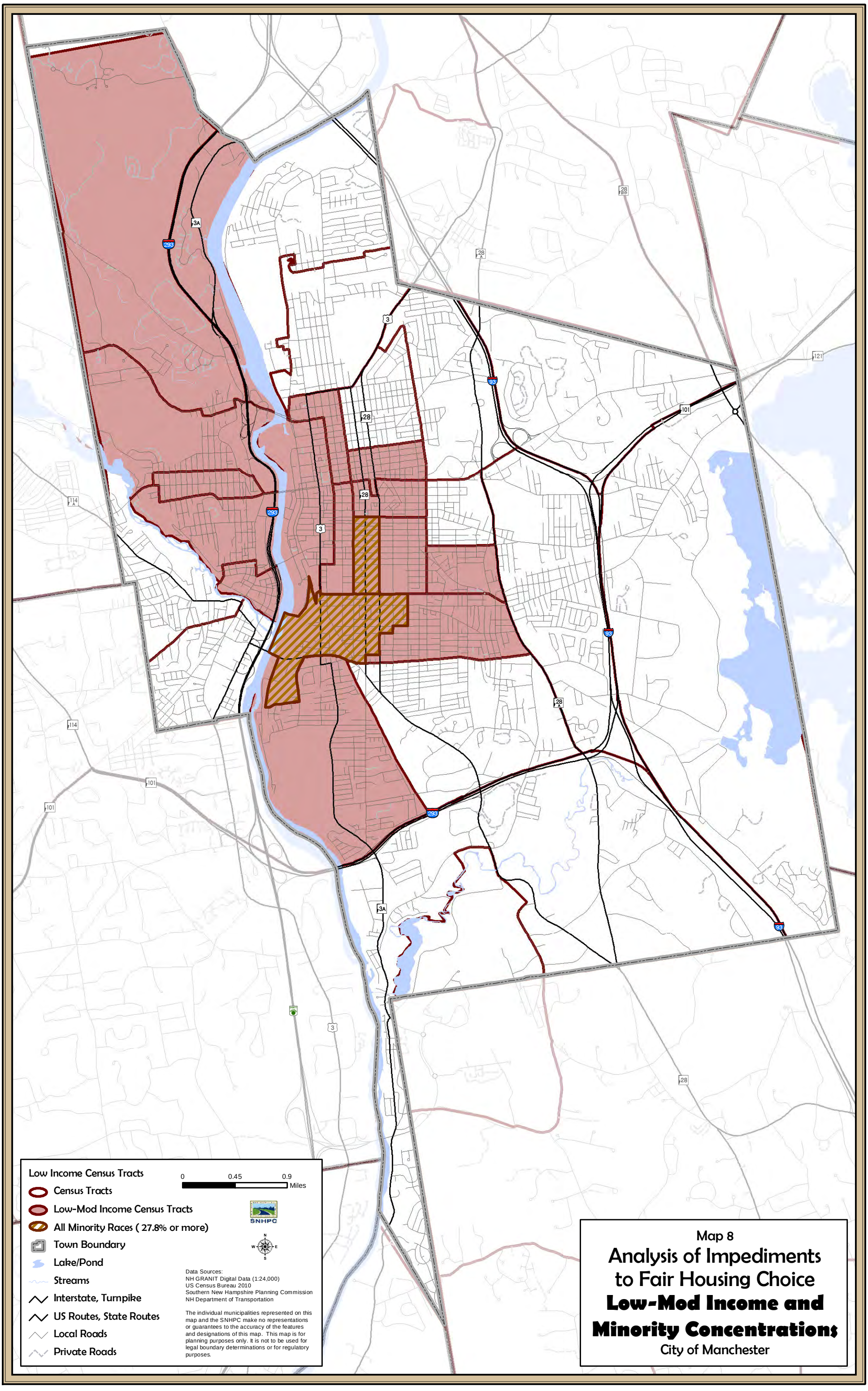
Map 7
Analysis of Impediments to Fair Housing Choice
Areas of Concentration of 2 or More Race Residents
City of Manchester


Low Income Census Tracts
Census Tracts
Low-Mod Income Census Tracts
All Minority Races (27.8% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
0
0.45
0.9
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
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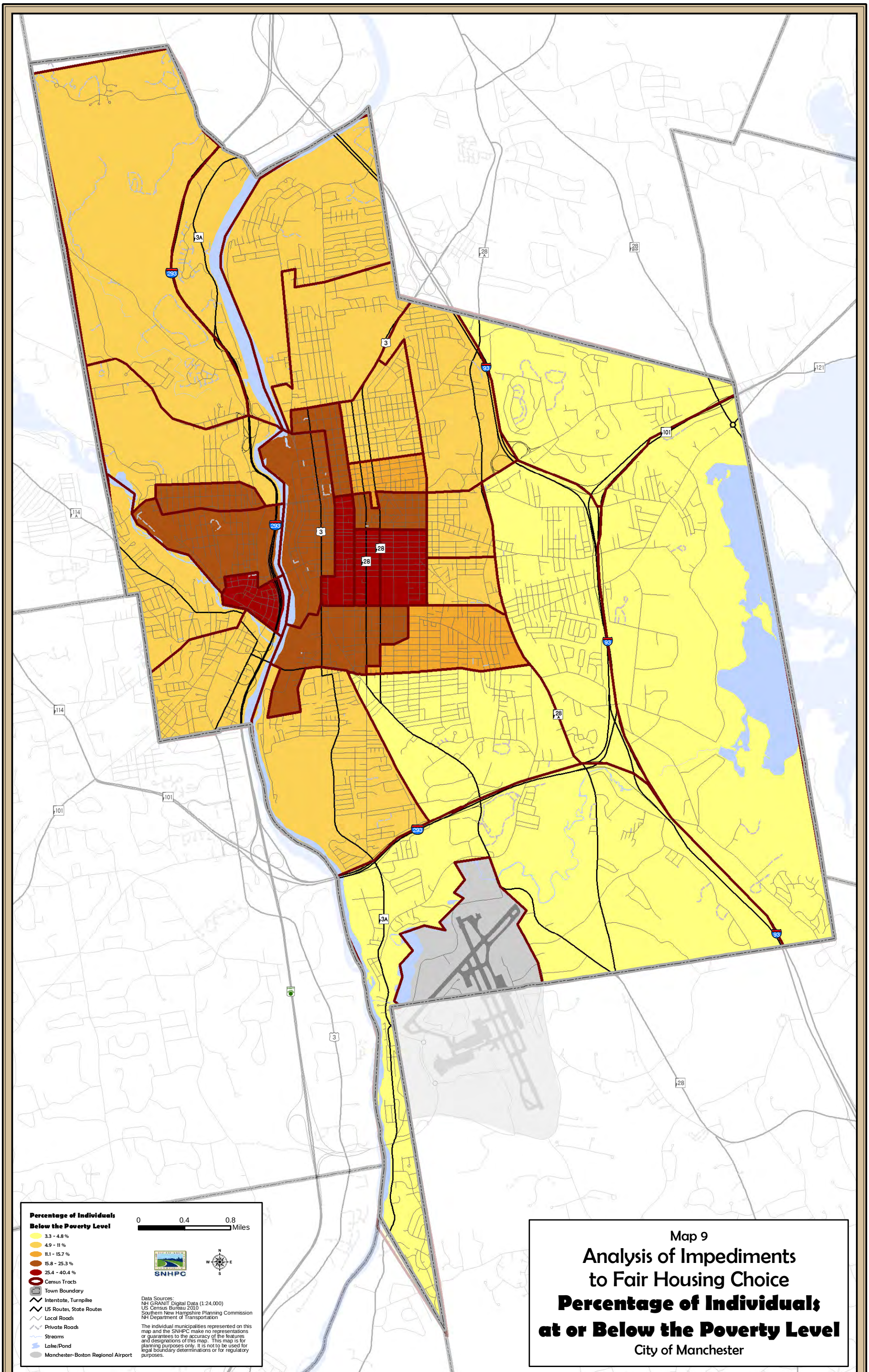
Map 8
Analysis of Impediments to Fair Housing Choice
Low-Mod Income and Minority Concentrations
City of Manchester


Percentage of Individuals
Below the Poverty Level
3.3 - 4.8 %
4.9 - 11 %
11.1 - 15.7 %
15.8 - 25.3 %
25.4 - 40.4 %
Census Tracts
Town Boundary
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
Streams
Lake/Pond
Manchester-Boston Regional Airport
0
0.4
0.8
Miles
SNHPC
N
W
E
S
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
The individual municipalities represented on this map and the SNHPC make no representations or guarantees to the accuracy of the features and designations of this map. This map is for planning purposes only. It is not to be used for legal boundary determinations or for regulatory purposes.
Map 9
Analysis of Impediments
to Fair Housing Choice
Percentage of Individuals
at or Below the Poverty Level
City of Manchester

ASSISTED HOUSING IN THE CITY OF MANCHESTER

Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities. Public housing comes in all sizes and types, from scattered single family houses to high-rise apartments for elderly families. There are approximately 1.2 million households (in the U.S.) living in public housing units, managed by some 3,300 Housing Authorities. The U.S. Department of Housing and Urban Development (HUD) administers Federal aid to local housing agencies (HAs) that manage the housing for low-income residents at rents they can afford. HUD furnishes technical and professional assistance in planning, developing and managing these developments. HAs use income limits developed by HUD. HUD sets the lower income limits at 80 percent and very low income limits at 50% of the median income for the county or metropolitan area in which a family or individual chooses to live. Income limits vary from area to area so eligibility also varies from one HA to another.[37]

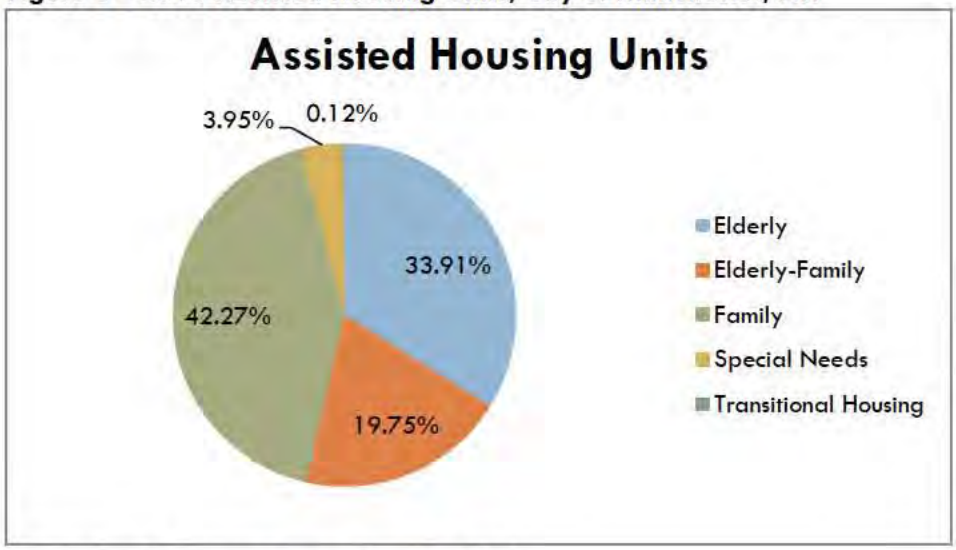
Map 10 illustrates the assisted housing units in the City of Manchester[38] compared to areas of Low-Moderate Income and areas of minority concentration. Map 11 illustrates assisted housing units in the City and their location in comparison to census tracts with high levels of poverty. Map 12 illustrates the density of assisted housing units in different areas of the City. Assisted Housing units are indicated by type and handicap accessibility. These maps show that while the locations of assisted housing units in the City appear to be mostly located within areas of minority concentration and areas with high levels of poverty, the number of units outside of these areas is actually quite high. Progress is being made to develop affordable housing options outside areas of low income and minority concentration and the City should continue to work with developers and property owners to overcome this impediment.

Figure 8 (page 30) illustrates the percentage of assisted housing units by type in the City. The largest percent of assisted housing units in the City of Manchester are available to family households, followed by developments that are available to elderly only.

[37] U.S. Department of Housing and Urban Development. "HUDs Public Housing Program." Web. 20 March 2013. <http://portal.hud.gov/hudportal/HUD?src=/topics/rental_assistance/phprog.>

[38] NHHFA. "Directory of Assisted Housing." January 2013. The Directory of Assisted Housing is updated on a regular basis by New Hampshire Housing Finance Authority to provide consumers, housing interest groups, and others with a guide to rent assisted housing facilities throughout the State. The publication is organized by county and community and lists the housing developments currently subsidized with funding from either the U.S. Department of Housing and Urban Development, USDA - Rural Development, or New Hampshire Housing through permanent financing or rental assistance payment mechanisms. This directory does not provide information on the Housing Choice Voucher (Section 8) Program, which provides rental assistance to individual households through rental vouchers.

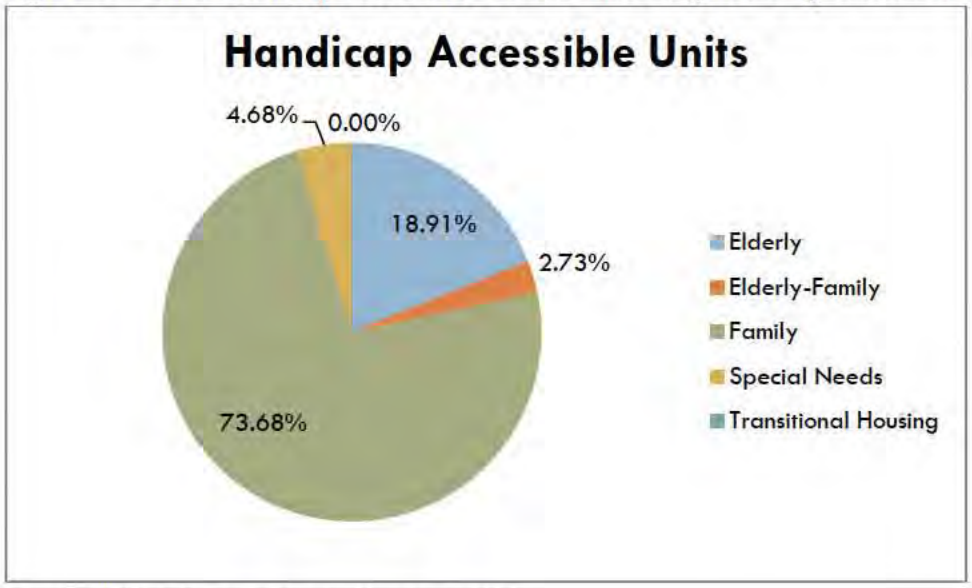
Figure 8 – 2013 Assisted Housing Units, City of Manchester, NH



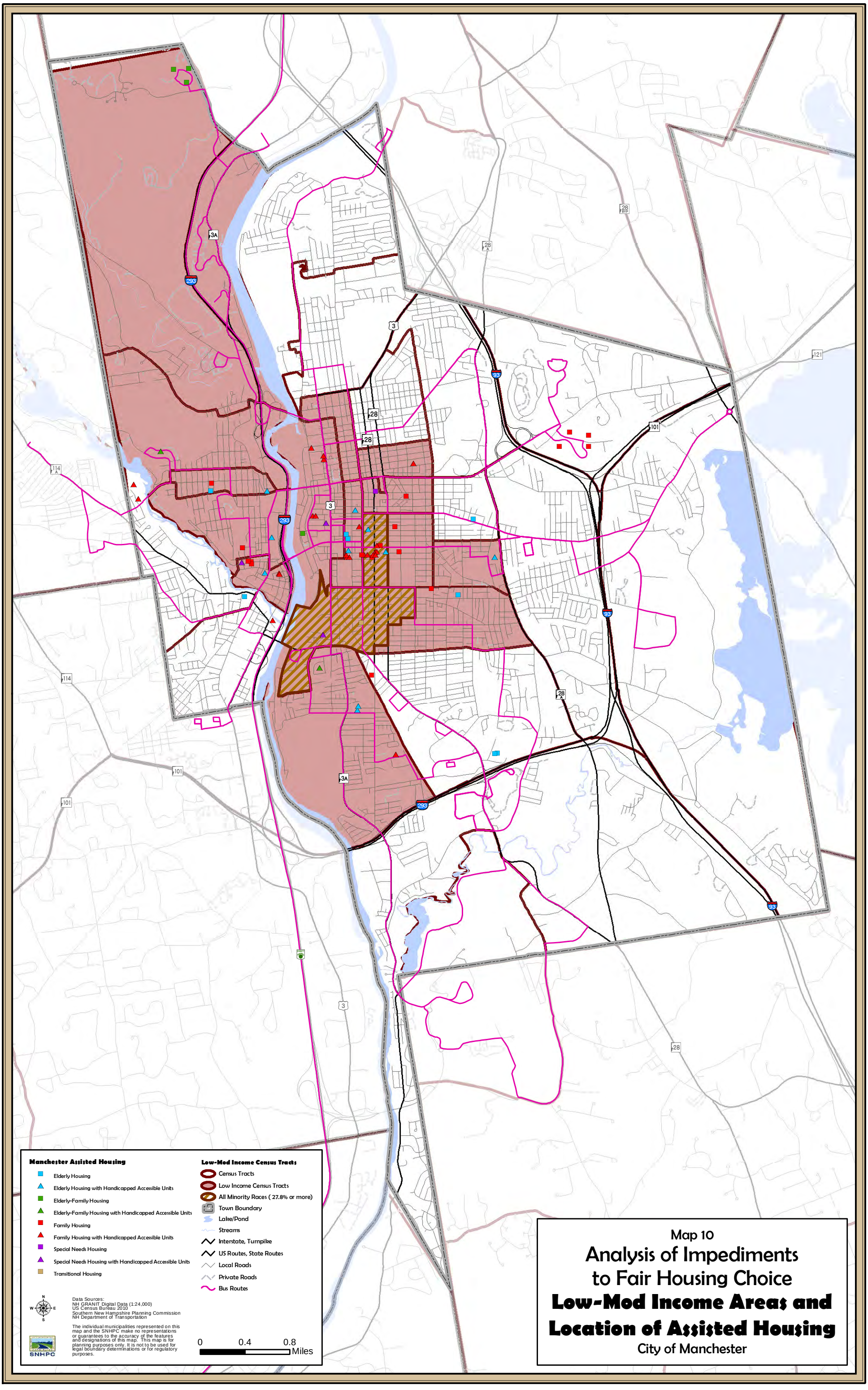
Source: NHHFA Assisted Housing Directory 2013.

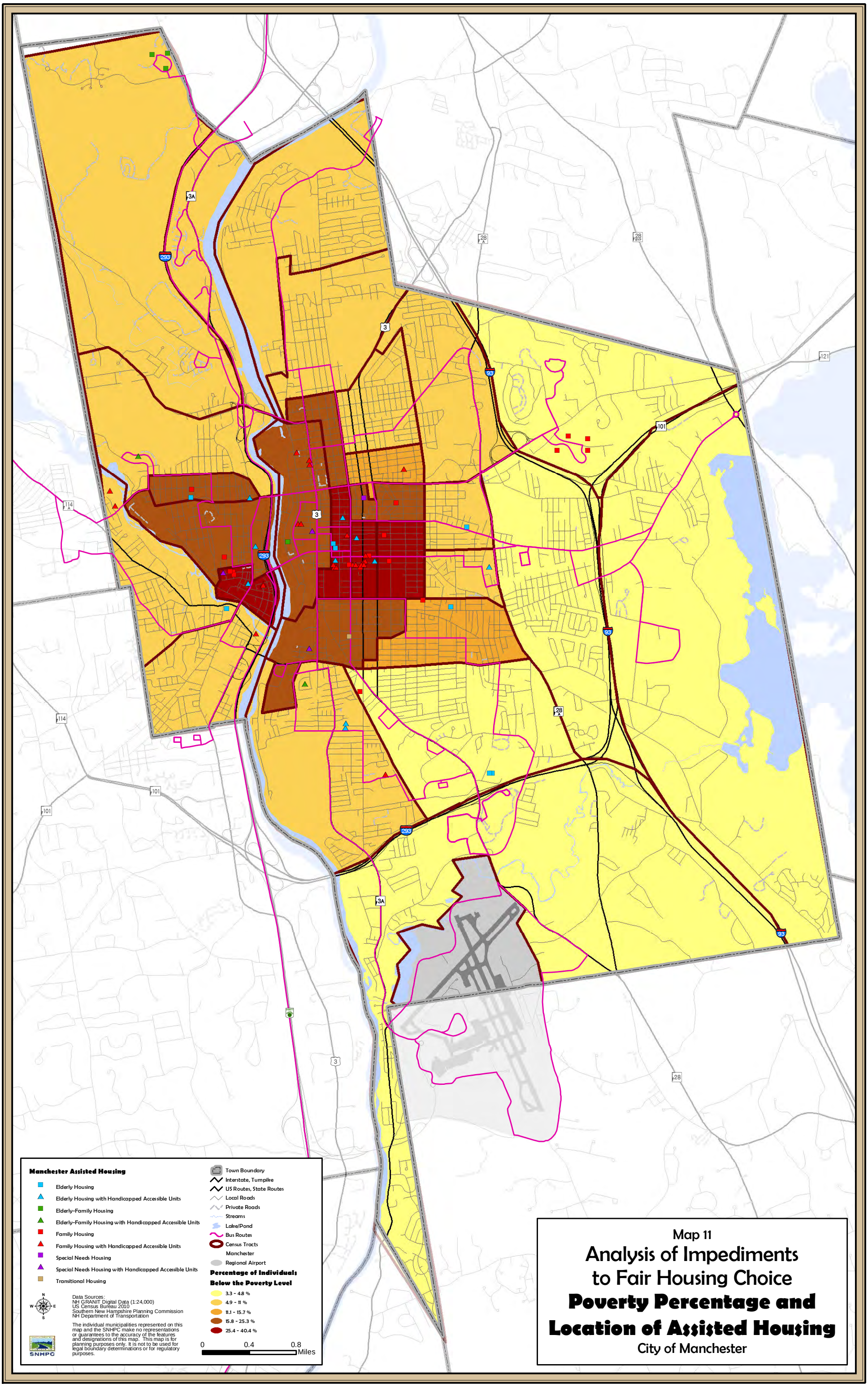
Handicap-accessible units that are available to family households comprise the majority of accessible units in the City, as illustrated in the graph below. Units represented here are only those developments currently subsidized with funding from either the U.S. Department of Housing and Urban Development, USDA – Rural Development, or New Hampshire Housing through permanent financing or rental assistance payment mechanisms.[38]

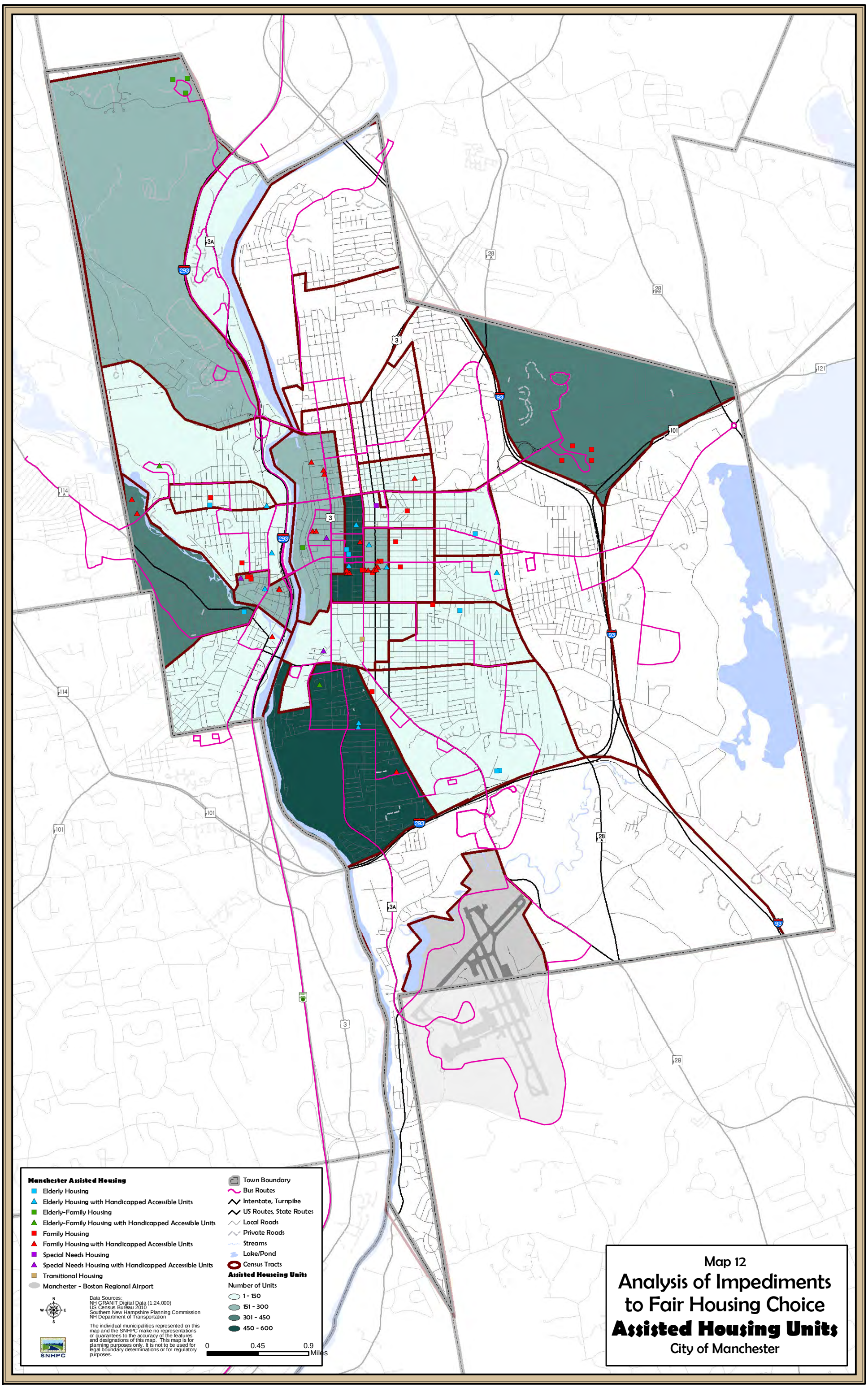
Figure 9 – 2013 Handicap Accessible Assisted Housing Units by Percent of Total



Source: NHHFA Assisted Housing Directory 2013.


Manchester Assisted Housing
Elderly Housing
Elderly Housing with Handicapped Accessible Units
Elderly-Family Housing
Elderly-Family Housing with Handicapped Accessible Units
Family Housing
Family Housing with Handicapped Accessible Units
Special Needs Housing
Special Needs Housing with Handicapped Accessible Units
Transitional Housing
Low-Mod Income Census Tracts
Census Tracts
Low Income Census Tracts
All Minority Races (27.8% or more)
Town Boundary
Lake/Pond
Streams
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
Bus Routes
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
The individual municipalities represented on this map and the SNHPC make no representations or guarantees to the accuracy of the features and designations of this map. This map is for planning purposes only. It is not to be used for legal boundary determinations or for regulatory purposes.
SNHPC
0 0.4 0.8 Miles
Map 10
Analysis of Impediments to Fair Housing Choice
Low-Mod Income Areas and Location of Assisted Housing
City of Manchester


Manchester Assisted Housing
Elderly Housing
Elderly Housing with Handicapped Accessible Units
Elderly-Family Housing
Elderly-Family Housing with Handicapped Accessible Units
Family Housing
Family Housing with Handicapped Accessible Units
Special Needs Housing
Special Needs Housing with Handicapped Accessible Units
Transitional Housing
Town Boundary
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
Streams
Lake/Pond
Bus Routes
Census Tracts
Manchester
Regional Airport
Percentage of Individuals Below the Poverty Level
3.3 - 4.8 %
4.9 - 11 %
11.1 - 15.7 %
15.8 - 25.3 %
25.4 - 40.4 %
0
0.4
0.8
Miles
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
The individual municipalities represented on this map and the SNHPC make no representations or guarantees to the accuracy of the features and designations of this map. This map is for planning purposes only. It is not to be used for legal boundary determinations or for regulatory purposes.
SNHPC
Map 11
Analysis of Impediments to Fair Housing Choice
Poverty Percentage and Location of Assisted Housing
City of Manchester


Map 12
Analysis of Impediments to Fair Housing Choice
Assisted Housing Units
City of Manchester
Manchester Assisted Housing
Elderly Housing
Elderly Housing with Handicapped Accessible Units
Elderly-Family Housing
Elderly-Family Housing with Handicapped Accessible Units
Family Housing
Family Housing with Handicapped Accessible Units
Special Needs Housing
Special Needs Housing with Handicapped Accessible Units
Transitional Housing
Manchester - Boston Regional Airport
Town Boundary
Bus Routes
Interstate, Turnpike
US Routes, State Routes
Local Roads
Private Roads
Streams
Lake/Pond
Census Tracts
Assisted Houseing Units
Number of Units
1 - 150
151 - 300
301 - 450
450 - 600
Data Sources:
NH GRANIT Digital Data (1:24,000)
US Census Bureau 2010
Southern New Hampshire Planning Commission
NH Department of Transportation
The individual municipalities represented on this map and the SNHPC make no representations or guarantees to the accuracy of the features and designations of this map. This map is for planning purposes only. It is not to be used for legal boundary determinations or for regulatory purposes.
SNHPC
0
0.45
0.9
Miles

LAND USE PRACTICES

Land use zoning emerged in the late 1800's to early 1900's as a way of protecting the public health, welfare, and safety by excluding obnoxious or incompatible uses from residential areas. It was also a means of protecting property values and thus changing the value of land based upon the zoning qualifications.

Local land use controls were identified in the 2010 New Hampshire Housing Analysis of Impediments to Fair Housing Choice as a major impediment in the state. "Zoning, growth controls, and impact fees – place significant obstacles in front of those who wish to develop affordable housing for lower income families…In particular, unreasonable restrictions on the creation of multifamily housing, strong incentives for the development of multi-unit 'housing for older persons' (rather than for families with children), and large lot requirements continue to have the effect of restricting housing options for lower income families."[3] This impediment is a regional issue that affects the City of Manchester as some of these land use restrictions and requirements that exist in surrounding communities may be limiting fair housing choice and further concentrating protected classes within the City where affordable housing exists because the local land use practices allow for it.

The City of Manchester encourages affordable housing development with density bonus incentives. Zoning that allows for urban multi-family, two-family and high-density one-family housing means that the City contains a majority of the affordable housing options in the region.

V. EVALUATION OF PUBLIC SECTOR POLICIES

FAIR HOUSING RESOURCES

Federal

U.S Department of Housing and Urban Development (HUD)

HUD administratively enforces federal housing discrimination laws such as the federal Fair Housing Act, as designated by statute. The Office of Fair Housing and Equal Opportunity (FHEO) is the HUD program office that specifically oversees fair housing. HUD produces many of the written fair housing materials distributed by state, local, and non-profit agencies in New Hampshire. The HUD Consolidation Plan's certification to "Affirmatively Furthering Fair Housing" requires entitlement communities to undertake Fair Housing Planning. The Analysis of Impediments to Fair Housing should be viewed as part of the City's Consolidated Plan.[13] The AI report has been completed to meet requirements of the Fair Housing Planning Guide.

HUD also receives federally-based housing discrimination complaints from residents. The HUD Regional Office serving New Hampshire is located in Boston, Massachusetts and may be reached at (800) 827-5005 toll-free. The nearest FHEO Office is located in Boston as well and may be reached at (617) 994-8300 or (617) 994-8305. Anyone with housing discrimination complainants may file federally-based complaints directly with HUD in a variety of languages via toll-free voice (800)669-9777 and TTY (800)927-9275, online at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/online-complaint, by

fax to (617) 565-7313 (the Boston FHEO office), or mail to the Boston FHEO Center at 10 Causeway Street, Suite 308, Boston, MA 02222.[39] The HUD housing discrimination complaint form is available electronically at https://portal.hud.gov/FHEO903/Form903/Form903Start.action and is included as part of the 2008 HUD Fair Housing brochure.[40] HUD assumes all costs of processing and investigating the complaints.[13]

U.S. Department of Justice, Civil Rights Division

The Housing and Civil Enforcement Section has the ability to prosecute civil violations of the federal Fair Housing Act. Located in Washington, D.C., there are several attorneys assigned to handle cases arising in the New England region. Although many of the cases handled are referred by other federal agencies, private citizens may also file complaints. Priority is given to "pattern and practice" cases involving ongoing violations affecting many people. There are no costs associated with lodging a complaint with the Department of Justice.[13]

U.S. Federal District Court, District of New Hampshire

New Hampshire residents with housing discrimination complainants may bring a private lawsuit in federal court for violations of the federal Fair Housing Act. There are filing fees and other potential costs of litigation, some of which may be waived by the court for low-income litigants.[13]

State

New Hampshire Commission for Human Rights (HRC)

The HRC is a state agency established by RSA 354-A for the purpose of eliminating discrimination in employment, public accommodations and the sale or rental of housing or commercial property, because of age, sex, sexual orientation, race, creed, color, marital status, familial status, physical or mental disability or national origin. The commission has the power to receive, investigate and pass upon complaints of illegal discrimination and to engage in research and education designed to promote good will and prevent discrimination. The New Hampshire "Law Against Discrimination" is contained in NH RSA 354-A, and covers employment, housing, and places of public accommodation. The Commission adopts rules pursuant to RSA 541-A, the Administrative Procedure Act, in accordance with the procedures set forth in the Act. The Commission's rules, once adopted in accordance with RSA 541-A, have the force of law unless they are amended or revised or unless a court of competent jurisdiction determines otherwise.[13]

State Court System

New Hampshire residents with housing discrimination complainants may bring legal actions in state superior or district courts for violations of federal or state housing discrimination laws. State claims must be filed first with the HRC, which then may grant permission to remove the complaints to state court. There are filing fees and other potential costs of litigation, some of which may be waived by the court for low-income litigants.[13]

State of New Hampshire, Office of the Attorney General

The New Hampshire Office of the Attorney General is available to serve the people of New Hampshire with diligence, independence and integrity by performing the constitutional, statutory and common law duties of

[39] U.S. Department of Housing and Urban Development. "Filing Your Housing Discrimination Complaint Online." Web. 20 March 2013. <http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/online-complaint>
[40] U.S. Department of Housing and Urban Development. "Fair Housing: Equal Opportunity for All." Web. 20 March 2013. <http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11868.pdf>

the Attorney General. Duties of the Attorney General include to serve as the State's chief legal officer and chief law enforcement officer; to seek to do justice in all prosecutions; to provide the State with legal representation and counsel of the highest quality; to protect the State's environment and the rights of its consumers; and to provide supervision and leadership of New Hampshire law enforcement.[13]

New Hampshire Housing Finance Authority (NHHFA)

New Hampshire Housing Finance Authority is a self-supporting public benefit corporation. Although established by statute as a public instrumentality, the Authority is not a state agency and receives no operating funds from the state government. The Authority administers a broad range of programs designed to assist low- and moderate-income persons and families with obtaining decent, safe and affordable housing. Their mission is to promote, finance and support affordable housing opportunities and related services for New Hampshire families and individuals through the efficient use of resources and the building of effective partnerships, thereby contributing to the economic and social development of the State and its communities.[41] NHHFA is associated with publications such as the Analysis of Impediments to Fair Housing Choice in New Hampshire 2010 Update.[3]

Non-profits

New Hampshire Legal Assistance and the Housing Justice Project (HJP)

New Hampshire Legal Assistance (NHLA) is a non-profit law firm offering legal services in civil matters to families, seniors and eligible low-income individuals. NHLA provides superior legal services to vulnerable low-income citizens, ranging from simple legal information and advice to vigorous and thorough representation in all of New Hampshire's courts and before many of the local, state and federal agencies. In providing legal services to lower income individuals, NHLA helps balance the scales of justice for all citizens.[13]

Partially funded in the past by the City of Manchester, The Housing Justice Project (HJP) of New Hampshire Legal Assistance is a group of dedicated attorneys and paralegals who are committed to promoting equal access to housing for New Hampshire Legal Assistance (NHLA) clients. Focusing on the rapidly growing minority, immigrant, and refugee communities in Manchester, the HJP works closely with local public and private organizations that assist these particularly vulnerable populations in the struggle against housing discrimination. The HJP battles housing discrimination by investigating complaints of discrimination involving section 8 or public housing issues, mortgage foreclosure, property taxes, mobile home park issues, fair housing/housing discrimination complaints and housing accessibility issues for persons with mobility disabilities. The HJP helps by providing full legal representation to lower income families and individuals in emergency situations who are either currently without shelter or are at imminent risk of becoming homeless. The individuals of HJP help ensure admittance to safe shelters and supply access to the proper resources to help families move out of homelessness. Additionally, the HJP also works to alleviate the steady stream of Manchester homeowners who are at risk of losing their homes to foreclosure by assisting them to file bankruptcy and save their home. As well as supplying legal assistances, the HJP does a considerable amount of community outreach to tenants, housing providers and social service agencies about tenants' rights and general fair housing law.[13]

Disability Rights Center (DRC)

The DRC provides information, advice, and legal representation to individuals who have problems with housing and have been discriminated against due to their disability. The DRC provides workshops and educational events on Fair Housing Rights of People with Disabilities.[13]

[41] New Hampshire Housing Finance Authority. Web. 20 March 2013.

Neighborworks Southern New Hampshire (NSNH)

NSNH is a non-profit organization dedicated to the improvement of the lives of individuals and families living in the Southern New Hampshire region by providing access to quality housing services, revitalizing neighborhoods and supporting opportunities for personal empowerment. NSNH has helped thousands of people break the cycle of poverty and improve their financial stability through either home ownership or providing quality affordable rental housing. In addition, NSNH conducts homeowner workshops that are designed to educate and prepare low income renters for homeownership by providing them with the abilities and skills needed to purchase and maintain their own home.[13]

The Way Home

The Way Home is a non-profit agency dedicated to helping low-income households obtain and succeed in safe, affordable housing. Since 1988, The Way Home has assisted more than 19,000 families and individuals with their housing needs. The Way Home has found that demand for its homeless prevention services has increased dramatically with the economic downturn. In addition, many families and individuals are at risk due to job losses: "In spite of the bursting of the housing bubble, housing remains too expensive for many families in Southern New Hampshire. In 2011, the affordable housing wage needed to rent a two-bedroom apartment in Manchester, NH was approximately $20.37/hr. Low-wage workers continue to be one paycheck from homelessness, even as more apartments become vacant." The Way Home's Housing Resource Center at 214 Spruce Street in Manchester provides HUD-certified housing counseling for at-risk homeowners, renters, and homeless persons as part of their innovative homelessness prevention and intervention programs. Working with community partners, they offer resources to help make housing safe, to help secure rental housing, and to provide transitional shelter & permanent supportive rental housing. The Way Home also strives to prevent foreclosures, which hit homeowners and smaller landlords alike, since foreclosures drive demand for rental units while depressing home values.[42]

Families in Transition (FIT)

Families in Transition is a non-profit organization located in Manchester and Concord, New Hampshire. It was founded in 1991 in response to the growing number of homeless individuals and families in the greater Manchester area and throughout the state. Since its inception, FIT has been committed to providing only the most innovative, comprehensive, and effective interventions specifically designed to help homeless individuals and families reach beyond the cycle of homelessness to lead healthy and successful lives. Their belief is that having a home is a basic human right and is fundamental to becoming an engaged and contributing member of the community.[43]

City

Manchester Housing and Redevelopment Authority (MHRA)

MHRA is the largest public housing agency and largest landlord in Northern New England. An independent, public non-profit, MHRA was established by state legislation and confirmed by a referendum of Manchester citizens in 1941 and receives policy oversight from a five-member Board of Commissioners. MHRA owns and manages 1,271 public housing apartments for low income families, elderly, and adults with disabilities, and provides housing subsidies for over 1,800 households through the administration of the Section 8 Housing Choice Voucher Program. MHRA also offers the Homeownership Program conducted in conjunction with the Housing Choice Voucher Program and operated in partnership with New Hampshire Housing Finance Authority and Neighborworks Southern New Hampshire. MHRA offers an array of supportive programming to residents,

[42] The Way Home. Web. 20 March 2013.
[43] Families in Transition. Web. 20 March 2013.

including a licensed after school child care program, teen educational and recreational activities, adult employment and vocational services, social activities for the elderly and adults with disabilities, and a seven-site Congregate Services Program which provides the supports needed (meals, housekeeping, etc.) to allow the elderly and persons with disabilities to maintain their independence. [44]

In addition to housing services, MHRA also conducts redevelopment activities on behalf of the City of Manchester and is the primary redevelopment entity in the City. MHRA takes credit for creating jobs and increasing Manchester's tax base through various major redevelopment initiatives, such as the Verizon Center, Manchester Air Park, the Center of New Hampshire, and Amoskeag Millyard. MHRA efforts have recently produced new affordable housing development initiatives, resulting in over 600 new units at a total development cost of over $70 million, which MHRA cities as evidence of its renewed emphasis on generating more low income housing opportunities.[44]

Manchester Welfare Department

The vision of the Manchester Welfare Department is to improve the quality of life for those disadvantaged members of their community, and to do so in the most professional and respectful manner. The Department's mission is to provide emergency assistance to individuals and families who lack adequate resources. They facilitate by directing less fortunate citizens to federal, state, and non-profit relief agencies to reduce the burden on their departmental budget and on Manchester taxpayers. They strive to promote self-reliance and independence in all whom the Department serves so that they may become productive citizens. [45]

City of Manchester Planning and Community Development Department

Financial assistance for housing activities in Manchester is primarily provided through the use of federal funds from the United States Department of Housing and Urban Development. The Federal funds include the Community Development Block Grant Program (CDBG), the HOME Investment Partnerships Program and to a lesser degree Emergency Shelter Grant monies. The use of these funds is restricted to activities which provide affordable housing or shelter to low income people. Federal Funds also include Neighborhood Stabilization Program (NSP and NSP III) funding to address the effects of abandoned and foreclosed properties, in order to put them back into service for the benefit of rehabilitation and extended affordability options. In addition to Federal funds the City also has an Affordable Housing Trust fund which is available for housing initiatives. The City allocates all of these funds on an annual basis as a part of the Community Improvement Program (CIP) process and on a project specific basis throughout the year.

The City Housing Initiatives also include a Lead Hazard Control Program. The purpose of the program is to assist property owners in the control of Lead Hazards that constitute an imminent health threat in homes built prior to 1978 and to protect young children from lead poisoning.

In addition to City resources, Manchester housing initiatives leverage monies from other sources. The majority of the leveraged funds are administered by the New Hampshire Housing Finance Authority and they include but are not limited to HOME Investment Partnership funds, the Affordable Housing Fund, tax exempt bonds and Low Income Housing Tax Credits.[46]

City of Manchester Consolidated Plan - The Consolidated Plan for the City of Manchester establishes the priorities for the use of Community Development Block Grant, HOME Investment Partnerships Program, and Emergency Shelter Grant funds granted to the City by the U.S. Department of Housing and Urban Development (HUD). It also serves as an application and performance reporting mechanism.[13]

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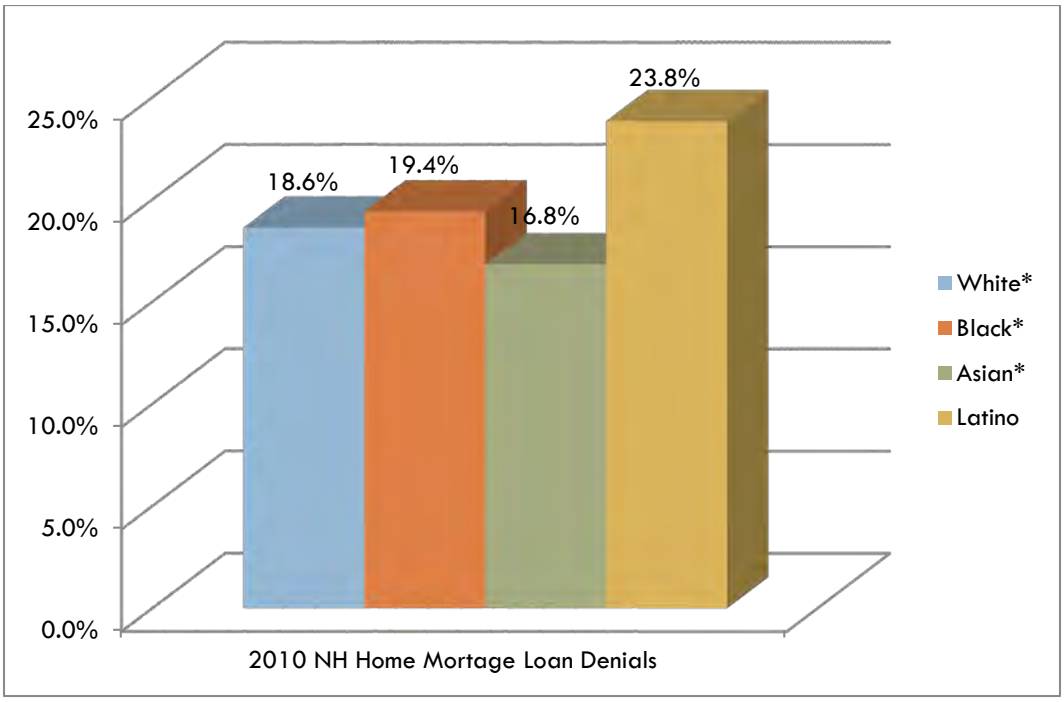
[44] Manchester Housing and Redevelopment Authority. Web. 20 March 2013.
[45] City of Manchester Welfare Department. Web. 20 March 2013.
[46] City of Manchester Planning and Community Development Department. Web. 20 March 2013.

VI. EVALUATION OF PRIVATE SECTOR POLICIES

MORTGAGE LENDING PRACTICES

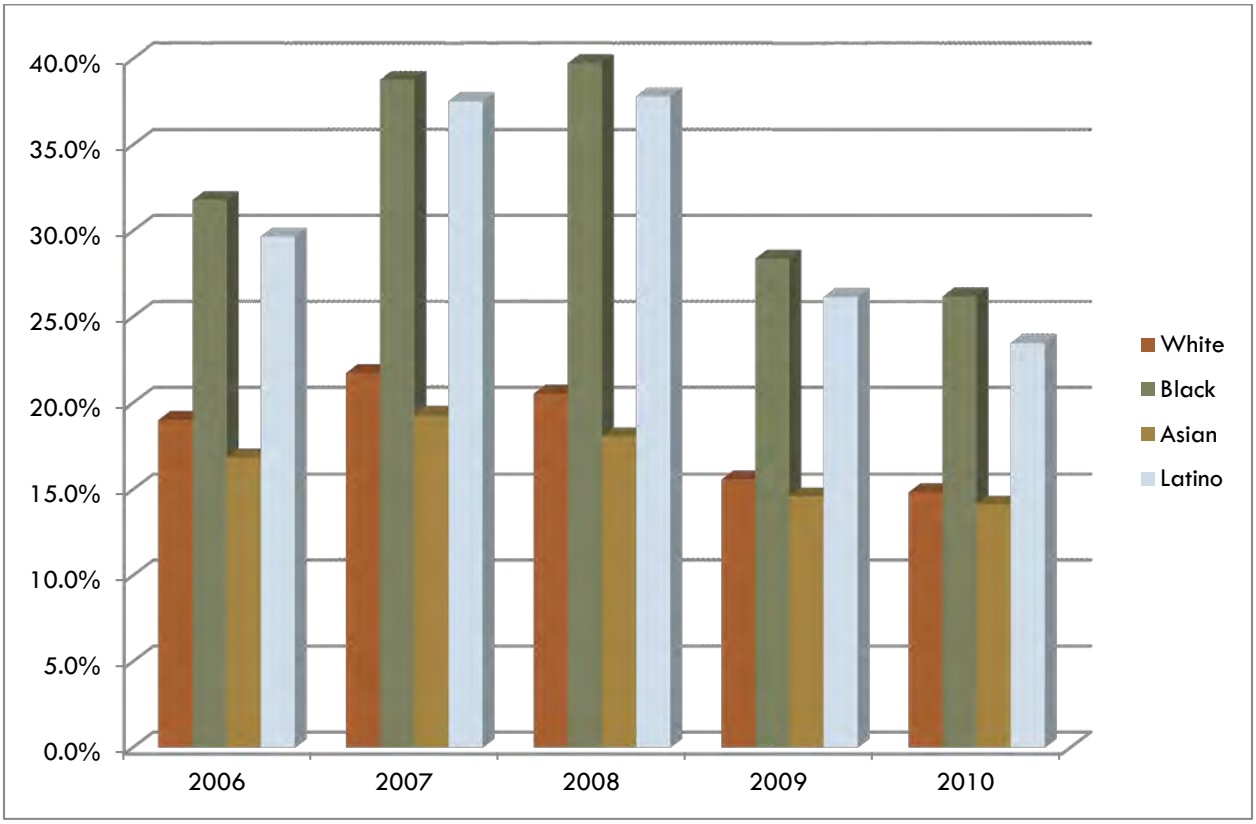
The chart below outlines mortgage loan denials by race for the State of New Hampshire for 2010. Latino households had the highest rate of denial, followed by Black households and then White households. Asian households had the smallest rate of denial for home mortgage loans in 2010.

Figure 10 - 2010 New Hampshire Home Mortgage Loan Denials



Source: 2010 HMDA. Data compiled by the Federal Reserve Bank of Boston.
*These data refer to Non-Latino white, non-Latino Black and non-Latino Asian

Figure 11 - New England Home Mortgage Denial Rates by Race/Ethnicity, 2006-2010



Source: 2006-2010 HMDA. Data compiled by the Federal Reserve Bank of Boston.

New Hampshire, along with Connecticut, Massachusetts, Maine, Rhode Island and Vermont are represented in the chart above illustrating total home mortgage denial rates by race/ethnicity for 2006-2010. The data is also shown in the table on the next page by income and race/ethnicity. It clearly illustrates that the Black and Latino populations have significantly higher denial rates than the White and Asian populations and when looking at the income data, this still holds true no matter what the income bracket is.

Table 5 - New England Home Mortgage Denial Rates by Income and Race/Ethnicity, 2006-2010

Income (in thousands)	1 to 30	31 to 50	51 to 70	71 to 90	91 to 120	121 to 150	over 150	Total
2006								
White	34.1%	22.9%	19.4%	17.9%	16.5%	14.6%	14.9%	19.0%
Black	47.4%	35.4%	31.3%	30.7%	29.8%	31.5%	29.6%	31.8%
Asian	37.8%	20.6%	18.7%	16.2%	14.1%	15.6%	14.0%	16.9%
Latino	49.2%	33.0%	29.3%	28.2%	28.1%	28.5%	26.5%	29.7%
2007								
White	36.8%	25.4%	22.6%	21.1%	19.3%	16.4%	16.1%	21.7%
Black	50.5%	39.5%	38.1%	38.5%	38.5%	37.9%	35.6%	38.8%
Asian	41.1%	26.1%	20.9%	19.2%	16.6%	14.4%	13.6%	19.3%
Latino	50.9%	38.5%	36.9%	37.7%	35.6%	35.2%	34.3%	37.5%
2008								
White	39.0%	25.8%	21.9%	20.0%	17.7%	15.4%	13.1%	20.5%
Black	55.2%	43.4%	38.6%	37.8%	38.9%	38.6%	33.3%	39.7%
Asian	48.2%	24.7%	21.5%	17.6%	15.6%	14.4%	10.8%	18.1%
Latino	57.0%	41.1%	37.8%	36.5%	32.9%	33.3%	27.1%	37.8%
2009								
White	35.5%	21.4%	17.0%	15.1%	13.3%	11.9%	11.0%	15.6%
Black	44.0%	32.1%	29.5%	29.7%	28.7%	23.7%	22.2%	28.4%
Asian	43.0%	23.8%	17.9%	14.0%	11.2%	10.6%	10.0%	14.6%
Latino	42.4%	31.2%	27.6%	25.3%	21.9%	18.5%	16.6%	26.1%
2010								
White	38.7%	21.4%	16.5%	14.2%	12.3%	10.4%	10.3%	15%
Black	45.0%	29.7%	26.6%	24.6%	24.3%	20.6%	18.2%	26%
Asian	45.4%	26.9%	18.9%	14.3%	10.9%	9.2%	8.8%	14%
Latino	43.0%	27.9%	23.2%	20.7%	18.1%	17.3%	14.5%	23%

NOTE: Tables include only first-lien loans for owner-occupied homes. The data exclude junior-lien loans, all loans for multi-family properties, and all loans for non-owner-occupied homes

Demographic groups refer to "Non-Latino white," "non-Latino Black," and "non-Latino Asian."

Source: 2006-2010 HMDA. Data compiled by the Federal Reserve Bank of Boston

REAL ESTATE PRACTICES

The following New Hampshire State Statute pertains to equal housing opportunity for the state:

RSA 354-A:8 Equal Housing Opportunity Without Discrimination a Civil Right. – The opportunity to obtain housing without discrimination because of age, sex, race, creed, color, marital status, familial status, physical or mental disability or national origin is hereby recognized and declared a civil right. In addition, no person shall be denied the benefit of the rights afforded by this section on account of that person's sexual orientation.

The federal Fair Housing Act makes it illegal to make, print or publish or cause to be made, printed or published housing ads that discriminate, limit or deny equal access to apartments or homes because of race, color, national origin, sex, religion, familial status and disability.

New Hampshire Legal Assistance handles Fair Housing cases for low-income and elderly clients in all regions of New Hampshire. They also offer community education and outreach on Fair Housing issues. NHLA work is funded by a grant from the United States Department of Housing and Urban Development (HUD).

From January 2010 to December 2012 NHLA handled 59 fair housing cases related to discrimination in the City of Manchester. Close to half of these were related to the protected class of those with a mental disability (29 cases). The protected class of those with a physical disability and those cases related to a national origin discrimination basis were both largely represented in this timeframe as well with 10 cases and 9 cases, respectively.

Table 6 – Manchester Fair Housing Cases, 2010-2012

City of Manchester Fair Housing Cases January 1, 2010 to December 31, 2012	
Protected Class	**Number of Cases**
Mental Disability	***29***
Physical Disability	***10***
Familial Status	***1***
National Origin	***9***
Race	***6***
Color	***0***
Gender	***3***
Religion	***0***
State: Marital Status	***0***
State: Age	***1***
State: Sexual Orientation	***0***
TOTAL	***59***

Source: New Hampshire Legal Assistance.

Housing discrimination complaints are up this period from the previous period reported in the 2010 City of Manchester Analysis of Impediments to Fair Housing Choice, which saw 27 housing discrimination complaints for the period July 2008 – February 2010.

VII. CURRENT FAIR HOUSING PROFILE

The City of Manchester has the highest population density in the State of New Hampshire and while Whites still represent a large portion of the population, the minority population is growing. "Almost 30 percent of the Black population of New Hampshire resides in Manchester."[34] Within the City, the areas of minority concentration are completely contained within the areas of low-moderate income concentration, as well as areas with high levels of poverty. The foreign born population in the City of Manchester is almost 12 percent of the City's population and more than twice the percent of people in the State of New Hampshire who are foreign born. The Black / African American poverty rate is significantly higher in both Manchester and the State of New Hampshire than any other race. Almost 30 percent of the individuals living with a disability in the City of Manchester are also living in poverty. Almost half of the households in the City of Manchester have a housing cost burden of greater than 30 percent of income. These statistics, along with the maps in this analysis reveal that issues of low-income and racial segregation are ongoing and that impediments to fair housing choice still need to be addressed, not only by the City of Manchester, but by the region and the State of New Hampshire as well. The issue of fair housing choice is not confined by political boundaries and ongoing efforts to address it on a regional and statewide basis will be necessary to change the landscape and to further fair housing choice.

Survey results substantiate the quantitative data that was analyzed and help to define what the impediments to fair housing choice are in the City. A majority of respondents felt that their housing choices are geographically limited in the City with a lack of sufficient, quality affordable housing cited as the biggest reason why they feel their choices are limited. Crime and safety, along with insufficient public transportation were also cited as some of the major reasons. Other major impediments that lead to residential segregation in the City revealed through the analysis, survey and stakeholder focus group include cultural/ language barriers, lack of information, education and training, and economic opportunity. The impediments identified are listed in detail in the next section, Impediments to Fair Housing Choice. A summary of survey results can be found in Appendix B.

VIII. IMPEDIMENTS TO FAIR HOUSING CHOICE

The following impediments to fair housing choice are identified for the City of Manchester through this analysis.

1. **Insufficient, Quality Affordable Housing**

   Affordable housing options tend to be concentrated in the center city and west side of Manchester and many of them are not maintained to adequate living standards. With more than half of the housing stock built over 50 years ago, many of the affordable housing options are in need of rehabilitation, renovation or lead-based paint hazard mitigation. In addition, the increasing cost of rent and economic consequences of the recent recession are increasing barriers to many people in the City, including the protected class groups. The wait for Section 8 vouchers from NH Housing Finance Authority is currently over nine years for low income people without "preferences" (e.g. homeless, persons with disabilities). The wait is seven to eight years at Manchester Housing Authority. This impacts affordable housing options for very low income people as it is not currently a resource nor will it be for many years.

   Proposed Action (i): The City should continue to balance Community Development Block Grant (CDBG) and HOME investment funds between the revitalization of impacted areas (those with housing problems, minority and/or low-income concentrations) and the creation of new affordable housing in non-impacted areas.

   Proposed Action (ii): Continue to fund Rental Assistance Programs and require financial fitness counseling, education and training as part of this program to ensure successful outcomes.

   Proposed Action (iii): Continue to fund the City's Housing Rehabilitation Program and Lead Hazard Control Program and conduct outreach for these programs to increase awareness of their availability and the minimum building standards that are required of property owners.

   Proposed Action (iv): Continue to fund the Concentrated Code Enforcement Officer, Neighborhood Revitalization Program (NRP), Healthy Neighborhoods and Weed and Seed Programs to promote healthier, safer and cleaner neighborhoods.

   Proposed Action (v): Continue to fund homeless prevention and rapid re-housing activities through Emergency Solutions Grant (ESG) funds to assist Manchester residents in gaining housing stability and temporary services to bridge to long-term stability.

   Proposed Action (vi): Continue to fund Down Payment and Closing Cost Assistance Programs for low-moderate income residents. Require homebuyer-counseling education and training as part of this program to ensure successful outcomes.

2. Crime and Safety

There is a limited supply of affordable housing in areas with low crime rates and where families have a sense of safety and security. Crime maps show the majority of criminal activity in areas of Manchester where affordable housing options are concentrated.[47]

Proposed Action (i): Continue to fund crime prevention and healthy neighborhoods programs that are aimed at addressing crime in the City.

Proposed Action (ii): Continue to fund the Neighborhood Revitalization Program, Healthy Neighborhoods, Weed and Seed Programs to promote healthier, safer and cleaner neighborhoods.

Proposed Action (iii): Continue to encourage and support Neighborhood Watch Groups in order to increase citizen participation and investment in reducing crime.

3. Housing Options for the Homeless/At-Risk of Homeless

The 2013 HUD mandated Point in Time Count for Manchester totaled 382 homeless people which included 56 family households with 154 people, 1 unaccompanied youth and 227 single adults. The count also depicted 287 "doubled-up" persons.

Subpopulation totals:

Chronically Homeless Persons	84
Chronically Homeless Families	1
Severely Mentally Ill	106
Chronic Substance Abuse	112
Veterans	17
Persons with HIV/AIDS	0
Domestic Violence Survivors	56

In addition to affordable housing, a high percentage of the homeless population need supportive services to attain and maintain housing, connect with mainstream resources, build financial literacy skills, attain employment and abide by rental agreements. Long waiting lists for affordable, quality housing and services for the homeless is an issue tied to lack of sufficient, quality affordable housing for this population.

Proposed Action (i): Continue the usage of CDBG, HOME and ESG funds as resources to provide housing assistance and services, including homeless prevention and rapid re-housing, for at-risk of homeless /homeless individuals and families.

[47] Manchester Police Department Data. Web. 29 March 2013.

Proposed Action (ii): Continue to coordinate with the City's Homeless Service Coordinator and Manchester Continuum of Care network to implement the goals and objectives that have been outlined as part of the 2008 Ten Year Plan to End Homelessness.

Proposed Action (iii): Continue to secure funding for permanent supportive housing options through the Manchester Continuum of Care (NOFA funded program are also options, but these programs also have wait lists.)

4. Language and Cultural Barriers

A lack of information in languages other than English, along with a lack of resources, education and integration for immigrants and refugees presents a barrier to fair housing for those households that come from different cultures and speak different languages.

Proposed Action (i): Encourage the city's continued support and funding for a stronger service network to provide immigrant and refugee populations with access to safe housing, essential services and resources for integration.

Proposed Action (ii): Fund and support interpretation and translation services for housing providers, property owners/managers and service network organizations to meet the needs of those with limited English proficiency (LEP).

Proposed Action (iii): Continue to fund an outreach campaign for immigrants, refugees and those with LEP to increase awareness of resources and services that are available to them in the City of Manchester, along with fair housing rights information.

5. Insufficient Fair Housing Information, Training, Education and Outreach

Survey results reveal that a majority of Manchester residents do not know where to find fair housing information and/or what their rights are in regards to fair housing. Discrimination data analyzed reveals that there is a need for continued outreach and education to property owners/managers and landlords to increase awareness of fair housing laws and to reduce discriminatory practices.

Proposed Action (i): Create a webpage and link on the City's homepage dedicated to Fair Housing Information.

Proposed Action (ii): Develop materials (print and electronic) and undertake an outreach campaign to increase knowledge of fair housing information, tenant rights and resources.

Proposed Action (iii): Facilitate an annual training/education workshop for property owners/managers to increase awareness and education of fair housing laws and resources.

6. Insufficient Public Transportation and Services Outside the Center City.

Insufficient public transportation and services outside of the center city is a barrier to transit-dependent households in need of those services to provide better linkages to employment centers and amenities. Although bus service covers a majority of the City, limited service and gaps to

certain areas of the City make it hard for these households to live outside of the center city. There is also very little public transportation and services outside of the City of Manchester, making transit-dependent households even further concentrated in the City and close to employment centers and services they need. For affordable housing providers the link between public transportation and employment centers is a driving force in determining where affordable housing can be located.

Proposed Action (i): Continue to provide adequate funding to the Manchester Transit Authority in order to sustain necessary public transit services to City residents, particularly residents located outside the center city.

Proposed Action (ii): In coordination with the Manchester Transit Authority, analyze current service, needs and linkages to determine the feasibility of increasing levels of service and extending service to areas not currently being served, including areas outside of the City where Manchester residents may need to travel for employment and services.

7. Discrimination and Patterns of Segregation

Survey responses along with mortgage loan denial rate data and housing discrimination complaint data reveals that discrimination still plays a role in existing patterns of segregation in the City of Manchester.

Proposed Action (i): Facilitate an annual training/education workshop for property owners/managers, banks and mortgage lenders to increase awareness and education of fair housing laws and resources.

Proposed Action (ii): Facilitate a series of workshops targeted towards property owners/managers to increase awareness and education on topics such as ADA compliance, accessibility standards and fair housing rights for the disabled/ handicap population, along with topics that pertain to all of the protected classes and fair housing rights.

Proposed Action (iii): Provide funding and services to test for discriminatory practices in order to measure progress in reducing discrimination in the City.

Proposed Action (iv): Provide funding for legal services to low-moderate income individuals that help to subsidize the cost of fair housing discrimination cases.

Proposed Action (v): Conduct a land use and zoning analysis for City policies and regulations, to ensure that impediments to fair housing choice are not created by land use and zoning policies in the City.

Proposed Action (vi): Participate in a regional initiative to analyze the patterns of segregation as they exist within the regional setting.

IX. FAIR HOUSING ACTION PLAN

Goals	Proposed Action	Responsible Party	Benchmark	Year to be completed
Impediment 1: Insufficient, quality affordable housing				
Increase the supply of quality, affordable housing and accessible housing throughout the City	(i): The City should continue to balance Community Development Block Grant (CDBG) and HOME investment funds between the revitalization of impacted areas and the creation of new affordable housing in non-impacted areas.	(i): City of Manchester Planning and Community Development Department	(i): Maps showing percentage of units built in impacted vs. non-impacted areas	Ongoing
	(ii): Continue to fund Rental Assistance Programs and require financial fitness counseling, education and training as part of this program to ensure successful outcomes.	(ii): City of Manchester Planning and Community Development Department	(ii): Documentation of support for assistance programs and training sessions	Ongoing
	(iii): Continue to fund the City's Housing Rehabilitation Program and Lead Hazard Control Program and conduct outreach for these programs to increase awareness of their availability and the minimum building standards that are required of property owners.	(iii): City of Manchester Planning and Community Development Department Lead Program	(iii): Documentation of funding provided under programs and outreach materials provided	Ongoing
	(iv): Continue to fund the Concentrated Code Enforcement Officer, Neighborhood Revitalization Program, Healthy Neighborhoods and Weed and Seed Programs to promote healthier, safer and cleaner neighborhoods.	(iv): City of Manchester Planning and Community Development Department and Health Department	(iv): Annual Budget/CIP Reports; Annual summary of NRP, Healthy Neighborhoods and Weed and Seed guidelines/accomplishments	Ongoing
	(v): Continue to fund homeless prevention and rapid rehousing activities through ESG to assist Manchester residents in gaining housing stability and temporary services to bridge to long-term stability.	(v): City of Manchester Planning and Community Development Department	(v): Documentation and summary of support provided through the project annually	Ongoing

Goals	Proposed Action	Responsible Party	Benchmark	Year to be completed
	(vi): Continue to fund Down Payment and Closing Cost Assistance Programs for low-moderate income residents. Require homebuyer-counseling education and training as part of this program to ensure successful outcomes.	(vi): City of Manchester Planning and Community Development Department	(vi): Documentation of support for assistance programs and homebuyer counseling sessions	Ongoing
Impediment 2: Crime and Safety				
Decrease crime rates and increase safety and security where affordable housing options exist in the City	(i): Continue to fund crime prevention and healthy neighborhoods programs that are aimed at addressing crime in the City.	(i): City of Manchester, Manchester Police Department	(i): Summary of crime rates over time, summary of programs in place over time and map of areas of concentration	Ongoing
	(ii): Continue to fund the Neighborhood Revitalization Program, Healthy Neighborhoods and Weed and Seed Programs to promote healthier, safer and cleaner neighborhoods.	(ii): City of Manchester Planning and Community Development Department and Health Department	(ii): Annual summary of NRP, Healthy Neighborhoods and Weed and Seed Programs guidelines/accomplishments	Ongoing
	(iii): Continue to encourage and support Neighborhood Watch Groups in order to increase citizen participation and investment in reducing crime.	(iii): Manchester Police Department	(iii): Documentation of formalized groups and attendance at group meetings	Ongoing
Impediment 3: Housing Options for the Homeless/At-Risk of Homeless				
Support housing options for the homeless/at-risk of homeless	(i): Continue the usage of CDBG, HOME and ESG funds as resources to provide housing assistance and services, including homeless prevention and rapid re-housing, for at-risk of homeless/homeless individuals and families.	(i): City of Manchester Planning and Community Development Department	(i): Documentation of funding provided under programs and outreach materials provided	Annual, Ongoing
	(ii): Continue to coordinate with the City's Homeless Service Coordinator and Continuum of Care network to implement the goals and objectives that have been outlined as part of the 2008 Ten Year Plan to End Homelessness.	(ii): City of Manchester Planning and Community Development Department, City of Manchester Homeless Services Coordinator	(ii): Annual summary documentation of Ten Year Plan status	2018

Goals	Proposed Action	Responsible Party	Benchmark	Year to be completed
	(iii): Continue to secure funding for permanent supportive housing options through the Manchester Continuum of Care (NOFA funded programs are also options, but these programs also have wait lists).	(iii): City of Manchester Homeless Services Coordinator	(iii): Documentation of funding provided under the Manchester Continuum of Care NOFA	Ongoing
Impediment 4: Language and Cultural Barriers				
Improve access to programs, services and information to persons with LEP	(i): Encourage the city's continued support and funding for a stronger service network to provide immigrant and refugee populations with access to safe housing, essential services and resources for integration.	(i): City of Manchester Planning and Community Development Department	(i): Documentation of support for services to immigrant and refugee populations	Ongoing
	(ii): Fund and support interpretation and translation services for housing providers, property owners/managers and service network organizations to meet the needs of those with limited English proficiency (LEP).	(ii): City of Manchester Planning and Community Development Department	(ii): Documentation of support for interpretation and translation services, summary of all entities who use the service annually	Ongoing
	(iii): Continue to fund an outreach campaign for immigrants, refugees and those with LEP to increase awareness of resources and services that are available to them in the City of Manchester, along with fair housing rights information.	(iii): City of Manchester Planning and Community Development Department	(iii): Documentation of outreach materials developed, Target summary of outreach goals met	Ongoing
Impediment 5: Insufficient Fair Housing Information, Training, Education and Outreach				
Support fair housing education, training and outreach throughout the City	(i): Create a webpage and link on the City's homepage dedicated to Fair Housing Information.	(i): City of Manchester, Planning and Community Development, Info systems	(i): Documentation of webpage, analytics on use of webpage	2013-2015
	(ii): Develop materials (print and electronic) and undertake an outreach campaign to increase knowledge of fair housing information, tenant rights and resources.	(ii): City of Manchester, Planning and Community Development	(ii): Documentation of outreach materials developed	2013-2015
	(iii): Facilitate an annual training/education workshop for property owners/managers to increase awareness and education of fair housing laws and resources.	(iii): City of Manchester, Planning and Community Development	(iii): Attendance sheet documentation for training/workshops	Annual, Ongoing

Goals	Proposed Action	Responsible Party	Benchmark	Year to be completed
Impediment 6: Insufficient public transportation and services.				
Sustain and increase levels of public transportation and services	(i): Continue to provide adequate funding to the Manchester Transit Authority in order to sustain necessary public transit services to City residents, particularly residents located outside the center city.	(i): City of Manchester Planning and Community Development Department; MTA	(i): Copy of annual budget showing allocation to MTA	Annual, Ongoing
	(ii): In coordination with the Manchester Transit Authority (MTA), analyze current service, needs and linkages to determine the feasibility of increasing levels of service and extending service to areas not currently being served, including areas outside of the City where Manchester residents may need to travel for employment and services.	(ii): City of Manchester Planning and Community Development Department; MTA	(ii): Documentation of meetings held to analyze transit services; reports and/or maps discussing needs and feasibility study for increased service	2013-2015
Impediment 7: Discrimination and Patterns of Segregation				
Support fair housing education, training and outreach throughout the City to reduce housing discrimination	(i): Facilitate an annual training/education workshop for property owners/managers, banks and mortgage lenders to increase awareness and education of fair housing laws and resources.	(i): City of Manchester, Planning and Community Development, Info systems	(i): Attendance sheet documentation for training/workshops	Annual, Ongoing
	(ii): Facilitate a series of workshops targeted towards property owners/managers to increase awareness and education on topics such as ADA compliance, accessibility standards and fair housing rights for the disabled/ handicap population, along with topics that pertain to all of the protected classes and fair housing rights.	(ii): City of Manchester Planning and Community Development Department	(ii): Attendance sheet documentation for training/workshops	Annual, Ongoing
	(iii): Provide funding and services to test for discriminatory practices in order to measure progress in reducing discrimination in the City.	(iii): City of Manchester Planning and Community Development Department	(iii): Report documentation on testing results	2013-2015, Every 3-5 years
	(iv): Provide funding for legal services to low-moderate income individuals that help to subsidize the cost of fair housing discrimination cases.	(iv): City of Manchester Planning and Community Development Department	(iv): annual summary statistics of legal services provided and protected classes represented	Ongoing

Goals	Proposed Action	Responsible Party	Benchmark	Year to be completed
	(v): Conduct a land use and zoning analysis for City policies and regulations, to ensure that impediments to fair housing choice are not created by land use and zoning policies in the City.	(v): City of Manchester, Planning and Community Development	(v): Report documentation on findings of analysis	2013-2015
	(vi): Participate in a regional initiative to analyze the patterns of segregation as they exist within the regional setting.	(vi): City of Manchester Planning and Community Development Department	(vi): Report documentation of Regional Study findings, attendance sheets for meetings participated in	2013-2014

SIGNATURE PAGE

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

_____

Ted Gatsas, Mayor

_____

Date

APPENDIX A – REFERENCE DATA

NEW HAMPSHIRE	
FY 2013 MFI:	
$79,300	
EXTREMELY LOW - 30% OF MEDIAN	
$16,650	1 Person
$19,050	2 Person
$21,400	3 Person
$23,800	4 Person
$25,700	5 Person
$27,600	6 Person
$29,500	7 Person
$31,400	8 Person
VERY LOW INCOME (50%)	
$27,750	1 Person
$31,700	2 Person
$35,700	3 Person
$39,650	4 Person
$42,800	5 Person
$46,000	6 Person
$49,150	7 Person
$52,350	8 Person
LOW-INCOME (80%)	
$44,400	1 Person
$50,750	2 Person
$57,100	3 Person
$63,450	4 Person
$68,500	5 Person
$73,600	6 Person
$78,650	7 Person
$83,750	8 Person

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

Demographic

Summary Information for Basic Demographic and Socioeconomic Characteristics

Total Population:	109,061
Total Households:	43,961
Homeownership Rate:	51
Average Household Size of Occupied Housing Units:	N/A
Average Household Size of Owner occupied Housing Units:	N/A
Average Household Size of Renter occupied Housing Units:	N/A
Median Household Income In The Past 12 Months:	N/A
Aggregate Household Income In The Past 12 Months:	2,775,490,600
Median Family Income In The Past 12 Months:	N/A
Median Nonfamily Household Income In The Past 12 Months:	N/A

2005-09 ACS

Person-level Information	Number	Percentage
Population 5 years and over that speak English 'not at all':	622	N/A
Persons in Poverty (Universe: Persons whose poverty status is determined):	14,950	No Data
Poverty Rate:	No Data	14.03%
Persons in Poverty in Family Households:	10,428	69.75%
Persons in Poverty in non-Family Households:	4,522	30.25%

2005-09 ACS

Race	Number	Percentage
White alone (not Hispanic)	91,976	84.33%
Black or African American alone (not Hispanic)	4,311	3.95%
American Indian and Alaska Native alone (not Hispanic)	239	0.22%
Asian alone (not Hispanic)	2,935	2.69%
Native Hawaiian and Other Pacific Islander alone (not Hispanic)	35	0.03%
Some other race alone (not Hispanic)	220	0.20%
Two or more races (not Hispanic)	1,470	1.35%
Persons of Hispanic Origin	7,875	7.22%
Total	**109,061**	

2005-09 ACS

Age	Number	Percentage
Population Age 0-17	24,538	22.50%
Population Age 18-24	11,772	10.79%
Population Age 25 - 64	59,826	54.86%
Population Age 65 and over	12,925	11.85%
Total	**109,061**	

2005-09 ACS

Household-level Information	Number	Percentage
Households with one or more people under 18 years:	13,604	30.95%
Households with one or more people 60 years and over:	11,690	26.59%
One person Household:	13,642	31.03%

2005-09 ACS

Household Income in the Past 12 Months	Number	Percentage
Less than $14,999	5,518	12.55%
$15,000 to $24,999	4,815	10.95%
$25,000 to $34,999	4,336	9.86%
$35,000 to $44,999	4,158	9.46%
$45,000 to $59,999	5,805	13.20%
$60,000 to $74,999	5,725	13.02%
$75,000 to $99,999	6,604	15.02%
$100,000 to $124,999	3,240	7.37%
$125,000 to $149,999	1,606	3.65%
$150,000 or more	2,154	4.90%
Total	**43,961**	

2005-09 ACS

Family-level Information	Number	Percentage
Families with Income in the past 12 months below poverty level:	2,790	
Families in poverty, owner occupants:	376	13.48%
Families in poverty, renter occupants:	2,414	86.52%

2005-09 ACS

Income	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	6,643	5,635	7,835	5,255	
Small Family Households*	2,244	1,603	2,899	12,415	
Large Family Households*	379	269	560	1,374	
Household contains at least one person 62-74 years of age	828	975	1,030	725	1,958
Household contains at least one person age 75 or older	1,127	1,242	999	412	977
Households with one or more children 6 years old or younger*	1,538	977	1,229	3,044	

*the highest income category for these family types is >80% HAMFI

2005-09 CHAS

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

Housing Needs

Occupancy	Number	Percentage
Households with 1 or more occupants per room:	867	1.97%
Owner Households with 1.00 or less occupants per room	22,137	99.45%
Owner Households with 1.01 to 1.50 occupants per room	84	0.38%
Owner Households with 1.51 or more occupants per room	39	0.18%
Renter Households with 1.00 or less occupants per room	20,957	96.57%
Renter Households with 1.01 to 1.50 occupants per room	613	2.82%
Renter Households with 1.51 or more occupants per room	131	0.60%

2005-09 ACS

Costs	Number	Percentage
Paying > 30%	18,823	42.82%
Earning Less than $34,999 paying > 30%	11,143	25.35%
Earning More Than $35,000 paying > 30%	7,680	17.47%
Owner Occupied Earning Less than $35,000 paying > 30%	2,739	12.30%
Owner Occupied Earning More than $35,000 paying > 30%	5,810	26.10%
Renter Occupied Earning Less than $35,000 paying > 30%	8,404	38.73%
Renter Occupied Earning More than $35,000 paying > 30%	1,870	8.62%

2005-09 ACS

Housing Problems

Households with one of the listed needs (renter)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Substandard Housing - Lacking complete plumbing or kitchen facilities	245	100	15	-	**470**
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	55	40	-	25	**120**
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	210	139	174	75	**618**
Housing cost burden greater than 50% of income (and none of the above problems)	2,985	1,210	69	30	**4,315**
Housing cost burden greater than 30% of income (and none of the above problems)	500	1,740	2,060	270	**4,655**
Zero/negative Income (and none of the above problems)	434	-	-	-	**434**

2005-09 CHAS

Households with one of the listed needs (owner)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Substandard Housing - Lacking complete plumbing or kitchen facilities	-	15	30	25	**125**
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	-	10	-	15	**40**
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	4	-	45	-	**85**
Housing cost burden greater than 50% of income (and none of the above problems)	824	591	804	340	**2,730**
Housing cost burden greater than 30% of income (and none of the above problems)	129	563	1,215	1,205	**5,159**
Zero/negative Income (and none of the above problems)	104	-	-	-	**104**

2005-09 CHAS

Households with one or more severe housing problem: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden (renter)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Having 1 or more of four housing problems	3,495	1,490	258	130	**5,485**
Having none of four housing problems	1,564	2,545	4,125	2,245	**15,785**
Household has negative income, but none of the other housing problems	434	-	-	-	**434**

2005-09 CHAS

Households with one or more severe housing problem: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden (owner)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Having 1 or more of four housing problems	834	616	884	375	**2,980**
Having none of four housing problems	239	1,005	2,569	2,509	**19,155**
Household has negative income, but none of the other housing problems	104	-	-	-	**104**

2005-09 CHAS

Cost Burden

Cost Burden > 30% (renter)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	1,604	1,050	814	**3,563**
Large Related	240	144	97	**481**
Elderly	800	708	289	**1,886**
Other	1,265	1,274	1,000	**3,753**
Total Households by Income	**5,484**	**4,020**	**N/A**	**21,685**

2005-09 CHAS

Cost Burden > 30% (owner)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	205	287	993	**3,503**
Large Related	64	90	189	**516**
Elderly	473	632	428	**1,892**
Other	198	154	470	**2,091**
Total Households by Income	**1,159**	**1,615**	**3,455**	**22,255**

2005-09 CHAS

Cost Burden > 50% (renter)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	1,414	325	-	**1,739**
Large Related	185	10	4	**199**
Elderly	590	423	45	**1,088**
Other	1,105	460	20	**1,585**
Total Households by Income	**5,484**	**4,020**	**N/A**	**21,685**

2005-09 CHAS

Cost Burden > 50% (owner)	0-30% AMI	30-50% AMI	50-80% AMI	All Households
Small Related	190	223	399	**1,081**
Large Related	64	90	85	**239**
Elderly	359	160	113	**702**
Other	198	119	215	**752**
Total Households by Income	**1,159**	**1,615**	**3,455**	**22,255**

2005-09 CHAS

Crowding

Crowding - More than one person per room (renter)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Single family households	255	134	149	100	**653**
Multiple, unrelated family households	-	55	25	-	**80**
Other, non-family households	10	-	-	-	**10**
Total Households by Income	5,484	**4,020**	**N/A**	**2,365**	**21,685**

2005-09 CHAS

Crowding - More than one person per room (owner)	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	All Households
Single family households	4	10	45	15	**94**
Multiple, unrelated family households	-	-	-	-	**25**
Other, non-family households	-	-	-	-	**-**
Total Households by Income	1,159	**1,615**	**3,455**	**2,890**	**22,255**

2005-09 CHAS

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

Housing Supply

Summary Information for Characteristics of the Housing Stock

Total housing units:	47,678
Vacancy Rate:	N/A
Median value for owner-occupied units:	N/A
Median value for owner-occupied units with a mortgage:	N/A
Median value for owner-occupied units without a mortgage:	N/A
Median contract rent for renter-occupied units:	N/A
Median age of structure for renter-occupied units:	N/A
Median number of rooms for owner-occupied units:	N/A
Median number of rooms for renter-occupied units:	N/A

2005-09 ACS

Simple Tabulations of Housing Characteristics

Number and percentage of occupied housing units by structure type	Owner	Pct	Renter	Pct	Total	Pct
1-unit Detached					18,131	38.03%
1-unit Attached					2,671	5.60%
2 to 4 Units					12,733	26.71%
5 to 19 Units					6,389	13.40%
20 or More Units					7,607	15.95%
Other (mobile home, RV, etc.)					147	0.31%
Total					**47,678**	

2005-09 ACS

Number and percentage of occupied housing units by bedrooms	Number	Percentage
No bedroom	1,110	2.52%
1 bedroom	8,160	18.56%
2 bedrooms	16,741	38.08%
3+ bedrooms	21,667	49.29%
Total	**43,961**	

2005-09 ACS

Number and percentage of owner-occupied housing units by bedrooms	Number	Percentage
No bedroom	14	0.06%
1 bedroom	953	4.28%
2 bedrooms	6,059	27.22%
3+ bedrooms	15,234	68.44%
Total	**22,260**	

2005-09 ACS

Number and percentage of renter-occupied housing units by bedrooms	Number	Percentage
No bedroom	911	4.20%
1 bedroom	6,527	30.08%
2 bedrooms	9,113	41.99%
3+ bedrooms	5,150	23.73%
Total	**21,701**	

2005-09 ACS

Number and percentage of renter-occupied units by contract rent	Number	Percentage
No cash rent	414	1.91%
$0-$499	3,109	14.33%
$500-$599	1,266	5.83%
$600-$699	2,280	10.51%
$700-$799	3,286	15.14%
$800-$899	3,306	15.23%
$900-$999	3,160	14.56%
$1000-$1249	3,268	15.06%
$1250-$1499	1,126	5.19%
$1500-$1999	345	1.59%
$2000 or More	141	0.65%
Total	**21,701**	

2005-09 ACS

Renter-occupied units by contract rent and bedrooms	Bedrooms	Number	Percent
Less Than $200	None	11	1.21%
Less Than $200	1	337	5.16%
Less Than $200	2	110	1.21%
Less Than $200	3+	9	0.17%
$200-$499	None	153	16.79%
$200-$499	1	1,075	16.47%
$200-$499	2	486	5.33%
$200-$499	3+	379	7.36%
$500-$999	None	708	77.72%
$500-$999	1	4,175	63.97%
$500-$999	2	3,914	42.95%
$500-$999	3+	1,190	23.11%
$1000 or More	None	39	4.28%
$1000 or More	1	919	14.08%
$1000 or More	2	4,395	48.23%
$1000 or More	3+	3,387	65.77%
No Cash Rent	None	-	0.00%
No Cash Rent	1	21	0.32%
No Cash Rent	2	208	2.28%
No Cash Rent	3+	185	3.59%

2005-09 ACS

Cross-tabulations of Multiple Characteristics

Number of occupied housing units by tenure and household size	Owner	Pct	Renter	Pct	Total	Pct
1 Person Household	5,396	24.24%	8,246	38.00%	13,642	31.03%
2 Person Household	8,209	36.88%	6,486	29.89%	14,695	33.43%
3 Person Household	3,697	16.61%	3,562	16.41%	7,259	16.51%
4 Person Household	3,188	14.32%	2,113	9.74%	5,301	12.06%
5 Person Household	1,258	5.65%	1,258	5.65%	2,021	4.60%
6+ Person Household	512	N/A	531	N/A	1,043	2.37%
Total	**22,260**	**50.64%**	**21,701**	**49.36%**	**43,961**	

2005-09 ACS

Number of occupied housing units by tenure and year structure built	Owner	Pct	Renter	Pct	Total	Pct
Built 2000 or later	1,412	6.34%	1,298	5.98%	2,710	6.16%
Built 1980-1999	5,396	24.24%	3,476	16.02%	8,872	20.18%
Built 1950-1979	7,720	34.68%	5,619	25.89%	13,339	30.34%
Built 1949 or earlier	7,732	34.73%	11,308	52.11%	19,040	43.31%
Total	**22,260**	**50.64%**	**21,701**	**49.36%**	**43,961**	

2005-09 ACS

Number of occupied housing units by tenure and presence of selected housing conditions*	Owner	Pct	Renter	Pct	Total	Pct
None of the selected housing conditions	14,102	63.35%	11,546	53.20%	25,648	58.34%
1 selected conditions	8,001	35.94%	9,337	43.03%	17,338	39.44%
2 selected conditions	157	0.71%	602	2.77%	759	1.73%
3 selected conditions	-	0.00%	216	1.00%	216	0.49%
4 selected conditions	-	0.00%	-	0.00%	-	0.00%
Total	**22,260**	**50.64%**	**21,701**	**49.36%**	**43,961**	

*Selected housing conditions = (1. lacks complete plumbing facilities, 2. lacks complete kitchen facilities, 3. housing costs greater than 30% of household income 4. more than one person per room)

2005-09 ACS

Units Affordable to Households Earning	Owner	Renter
30% HAMFI	No Data	1,953
50% HAMFI	287	4,377
80% HAMFI	2,042	12,866
100% HAMFI	3,106	No Data

2005-09 CHAS

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

Economic Context

Summary Information about Economic Conditions

Total In Civilian Labor Force	61,440
Civilian employed population 16 years and over	57,652
Unemployment Rate	6.17
Average travel time to work	N/A

2005-09 ACS

Simple Tabulations of Economic Conditions

Unemployment by Age Group	**Number**	**Rate**
Age 16-24	1,390	27.78%
Age 25-65	2,317	3.87%
Over Age 65	81	0.63%
Total	**3,788**	**6.17%**

2005-09 ACS

Occupation	**Number**	**Percentage**	**Median Income**
Management, business, and financial occupations	19,029	33.01%	N/A
Farming, fishing and forestry occupations	35	0.06%	N/A
Service occupations	9,826	17.04%	N/A
Sales and office occupations	15,694	27.22%	N/A
Construction, extraction, maintenance, and repair occupations	5,227	9.07%	N/A
Production, transportation, and material moving occupations	7,841	13.60%	N/A
Total	**57,652**		

2005-09 ACS

Travel Time to Work	Number	Percentage
Less than 30 minutes	40,789	74.02%
30 to 59 minutes	11,177	20.28%
60 or more minutes	3,143	5.70%
Total	**55,109**	

2005-09 ACS

Educational Attainment

Educational Attainment	Age 18-24	Age 25-34	Age 35-44	Age 45-64	Age 65+
Less than 9th grade	238	445	522	1,051	2,242
9th to 12th grade no diploma	2,197	1,060	1,227	1,950	1,803
High school graduate, GED, or alternative	3,814	5,164	5,633	8,177	4,767
Some college, no degree	2,954	3,873	3,482	5,021	1,702
Associate's Degree	625	1,484	1,580	2,823	465
Bachelor's Degree	1,687	4,350	2,716	4,266	1,064
Graduate or Professional Degree	257	1,230	1,347	2,425	882

2005-09 ACS

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	N/A
High school graduate (includes equivalency)	N/A
Some college or Associate's Degree	N/A
Bachelor's Degree	N/A
Graduate or Professional Degree	N/A

2005-09 ACS

Educational Attainment	In Labor Force - Civilian Employed	In Labor Force - Unemployed	Not In Labor Force
Less than high school graduate	3,453	382	2,384
High school graduate (includes equivalency)	14,592	962	3,420
Some college or Associate's degr	14,907	616	2,688
Bachelor's degree or high	14,215	357	1,749

2005-09 ACS

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers (%)	Share of Jobs (%)	Jobs Less Workers (%)
Agriculture, Mining, Oil and Gas Extraction	N/A	N/A	N/A	N/A	N/A
Arts, Entertainment, Accommodations	N/A	N/A	N/A	N/A	N/A
Construction	N/A	N/A	N/A	N/A	N/A
Education and Health Care Services	N/A	N/A	N/A	N/A	N/A
Finance, Insurance, and Real Estate	N/A	N/A	N/A	N/A	N/A
Information	N/A	N/A	N/A	N/A	N/A
Manufacturing	N/A	N/A	N/A	N/A	N/A
Other Services [except Public Administration]	N/A	N/A	N/A	N/A	N/A
Professional, Scientific, Management Services	N/A	N/A	N/A	N/A	N/A
Public Administration	N/A	N/A	N/A	N/A	N/A
Retail Trade	N/A	N/A	N/A	N/A	N/A
Transportation and Warehousing	N/A	N/A	N/A	N/A	N/A
Wholesale Trade	N/A	N/A	N/A	N/A	N/A
Total	**N/A**	**N/A**			

2005-2009 ACS (Workers), 2010 ESRI Business Analyst Package (Jobs)

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

Special Needs

Homelessness (only available for CoC target jurisdictions)

Population experiencing homelessness on a given night	Sheltered	Unsheltered
Persons in Households with Adult(s) and Child(ren)	N/A	N/A
Persons in Households with Only Children	N/A	N/A
Persons in Households with only Adults	N/A	N/A
Chronically Homeless Individuals	N/A	N/A
Chronically Homeless Families	Available 2012	Available 2012
Veterans	N/A	N/A

2010 Point in Time (PIT) Data

Facilities Targeted to Homeless Persons	Emergency Shelter Year Round Beds (Current and New)	Emergency Shelter Voucher/ Seasonal/ Overflow Beds	Transitional Housing Beds (Current and New)	Permanent Supportive Housing Beds (Current and New)	Permanent Supportive Housing Beds Under Development
Households with Adult(s) and Children	N/A	N/A	N/A	N/A	N/A
Households with Only Children	N/A	N/A	N/A	N/A	N/A
Households with Only Adults	N/A	N/A	N/A	N/A	N/A
Chronically Homeless Households	N/A	N/A	N/A	N/A	N/A
Veterans	N/A	N/A	N/A	N/A	N/A

2010 Homeless Inventory Chart (HIC)

Current HOPWA Formula Data

Cumulative cases of AIDS reported	N/A
Area incidence of AIDS	N/A
Rate per population	N/A
Number of new cases prior year (3 years of data)	N/A
Rate per population (3 years of data)	N/A

CDC Surveillance Data

Current HOPWA Surveillance Data

Number of Persons living with HIV (PLWH)	N/A
Area Prevalence (PLWH per population)	N/A
Number of new HIV cases reported last year	N/A

CDC HIV Surveillance Data

HOPWA Assistance Baseline

Type of HOPWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
Tenant based rental assistance	N/A
Permanent housing in facilities	N/A
Short-term Rent, Mortgage, and Utility	N/A
Short-term or transitional housing facilities	N/A
Permanent housing placement	N/A

HOPWA Grantee CAPER and HOPWA Beneficiary Verification Worksheet

HIV Housing Need

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	N/A
Short-term Rent, Mortgage, and Utility	N/A
Facility Based Housing (Permanent, short-term or transitional)	N/A

HOPWA Grantee CAPER and HOPWA Beneficiary Verification Worksheet

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

Target Report Area Name: **For Manchester city, Tract 33011002200**

33011000202
33011000101
33011000102
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33011002500
33011002600

CPD Maps_Manchester2

Consolidated Plan and Continuum of Care Planning Tool

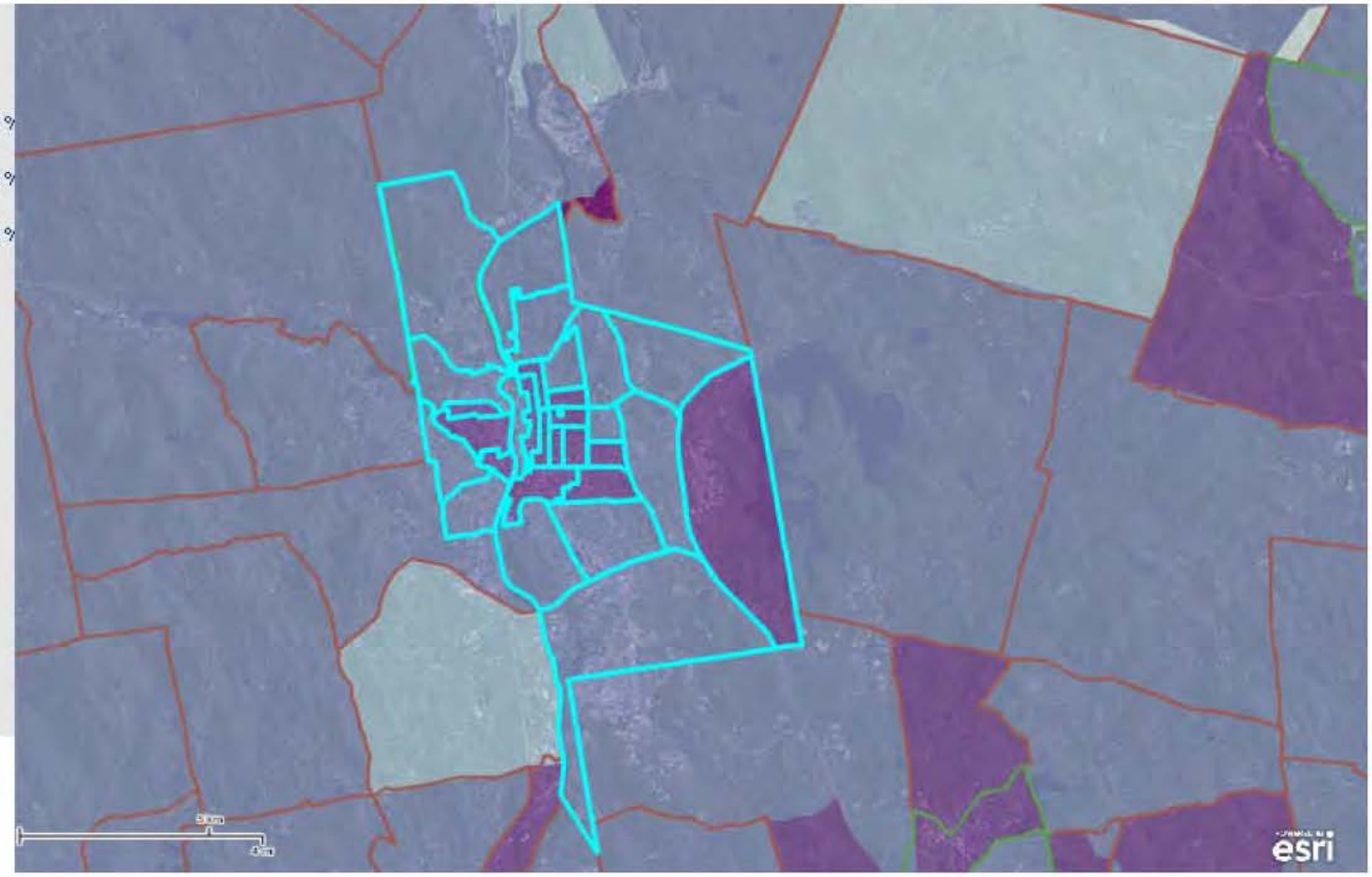
Target

Housing Cost Burden

- <11.38% Paying>30%
- 11.38-28.65% Paying>30%
- 28.65-44.32% Paying>30%
- 44.32-72.73% Paying>30%
- >72.73% Paying>30%

Census Tracts

Low-Mod Census Tracts



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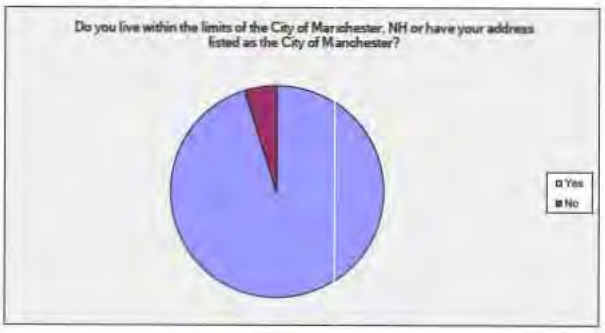
APPENDIX B – 2013 FAIR HOUSING SURVEY AND FOCUS GROUP SUMMARIES

City of Manchester Analysis of Impediments to Fair Housing Choice

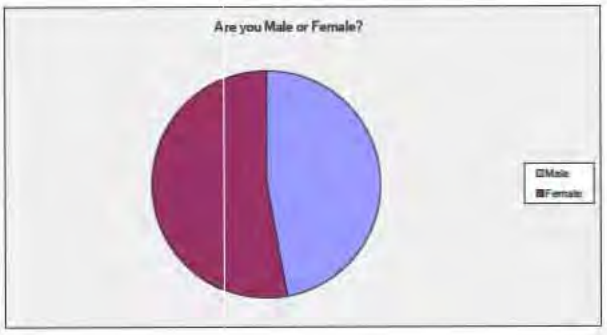
Q1: Do you live within the limits of the City of Manchester, NH or have your address listed as the City of Manchester?

Answer Options	Response Percent	Response Count
Yes	95.1%	173
No	4.9%	9
answered question		182
skipped question		0



City of Manchester Analysis of Impediments to Fair Housing Choice

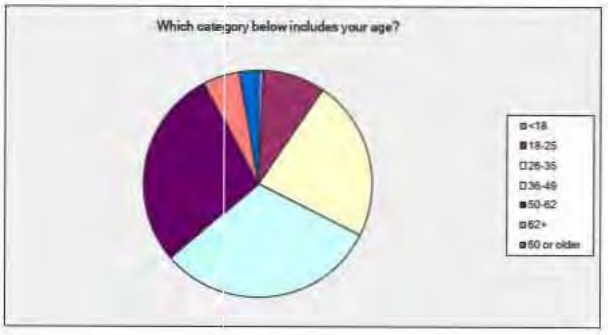
Q2: Are you Male or Female?		
Answer Options	Response Percent	Response Count
Male	47.2%	84
Female	52.8%	94
	answered question	178
	skipped question	4



City of Manchester Analysis of Impediments to Fair Housing Choice

Q3: Which category below includes your age?

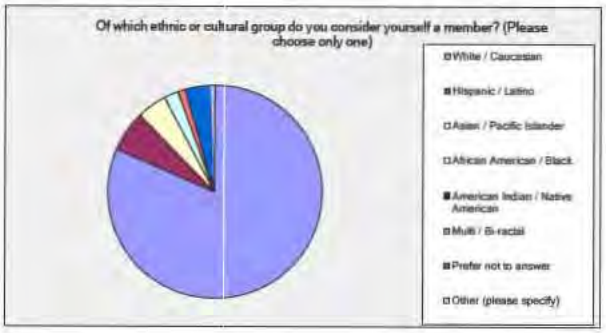
Answer Options	Response Percent	Response Count
<18	0.6%	1
18-25	8.9%	16
26-35	22.9%	41
36-49	31.3%	56
50-62	28.5%	51
62+	5.0%	9
60 or older	2.8%	5
	answered question	179
	skipped question	3



City of Manchester Analysis of Impediments to Fair Housing Choice

Q4: Of which ethnic or cultural group do you consider yourself a member? (Please choose only one)

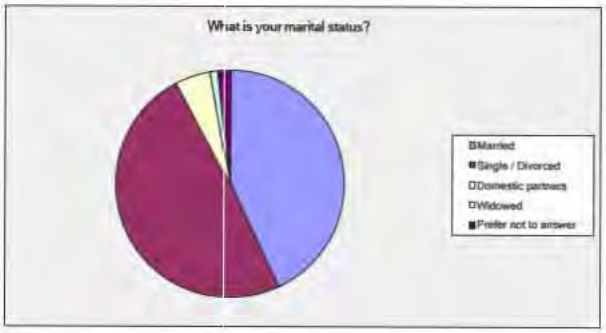
Answer Options	Response Percent	Response Count
White / Caucasian	81.5%	145
Hispanic / Latino	6.2%	11
Asian / Pacific Islander	4.5%	8
African American / Black	2.2%	4
American Indian / Native American	0.0%	0
Multi / Bi-racial	1.1%	2
Prefer not to answer	3.9%	7
Other (please specify)	0.6%	1
answered question		178
skipped question		4



City of Manchester Analysis of Impediments to Fair Housing Choice

Q5: What is your marital status?

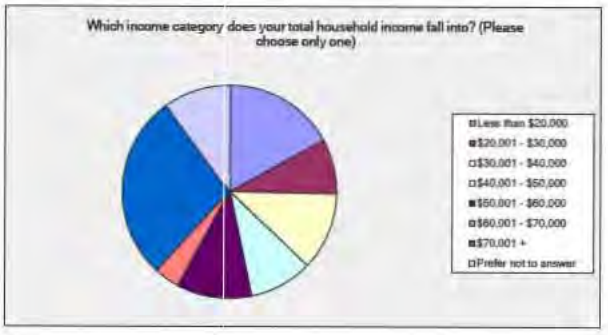
Answer Options	Response Percent	Response Count
Married	43.0%	77
Single / Divorced	49.2%	88
Domestic partners	5.0%	9
Widowed	1.1%	2
Prefer not to answer	1.7%	3
answered question		179
skipped question		3



City of Manchester Analysis of Impediments to Fair Housing Choice

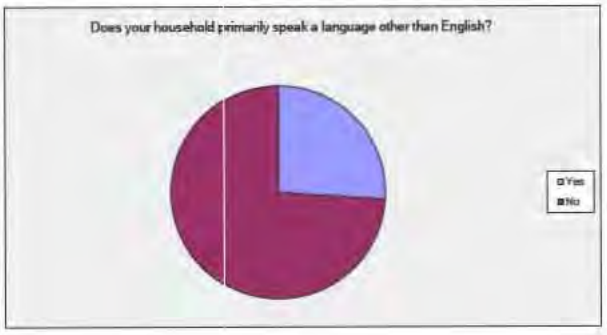
Q6: Which income category does your total household income fall into? (Please choose only one)

Answer Options	Response Percent	Response Count
Less than $20,000	16.9%	30
$20,001 - $30,000	8.4%	15
$30,001 - $40,000	11.8%	21
$40,001 - $50,000	9.6%	17
$50,001 - $60,000	11.2%	20
$60,001 - $70,000	3.9%	7
$70,001 +	28.1%	50
Prefer not to answer	10.1%	18
answered question		178
skipped question		4



City of Manchester Analysis of Impediments to Fair Housing Choice

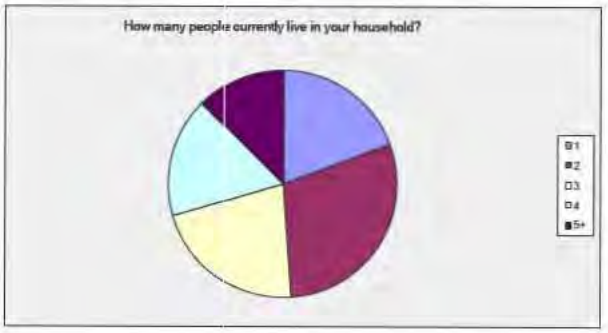
Q7: Does your household primarily speak a language other than English?		
Answer Options	Response Percent	Response Count
Yes	26.1%	46
No	73.9%	130
If yes, what language?		20
answered question		176
skipped question		6



City of Manchester Analysis of Impediments to Fair Housing Choice

Q8: How many people currently live in your household?

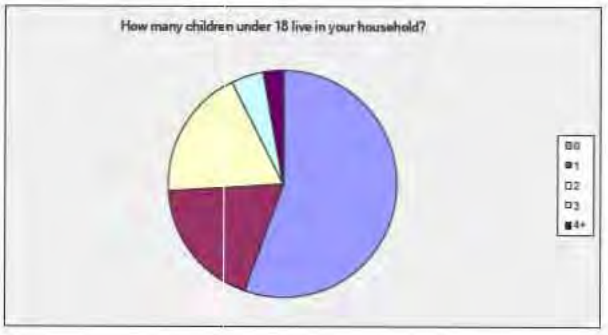
Answer Options	Response Percent	Response Count
1	19.3%	34
2	29.5%	52
3	21.6%	38
4	17.0%	30
5+	12.5%	22
answered question		176
skipped question		6



City of Manchester Analysis of Impediments to Fair Housing Choice

Q9: How many children under 18 live in your household?

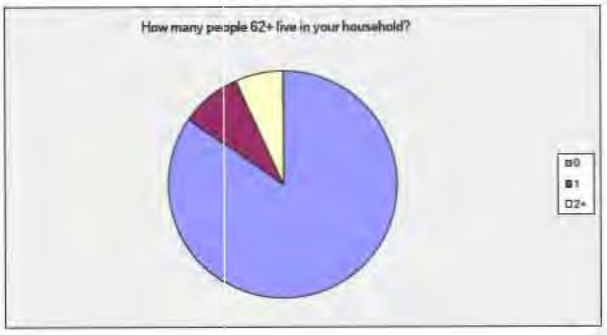
Answer Options	Response Percent	Response Count
0	55.5%	96
1	18.5%	32
2	18.5%	32
3	4.6%	8
4+	2.9%	5
	answered question	173
	skipped question	9



City of Manchester Analysis of Impediments to Fair Housing Choice

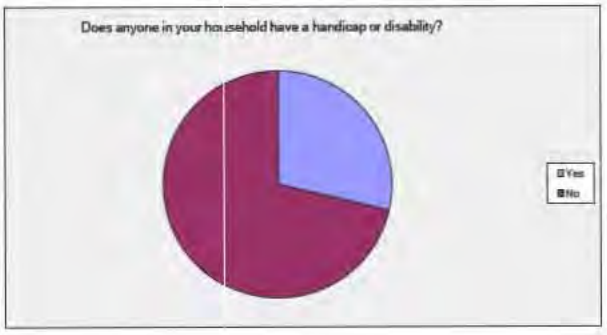
Q10: How many people 62+ live in your household?

Answer Options	Response Percent	Response Count
0	84.7%	150
1	8.5%	15
2+	6.8%	12
answered question		177
skipped question		5



City of Manchester Analysis of Impediments to Fair Housing Choice

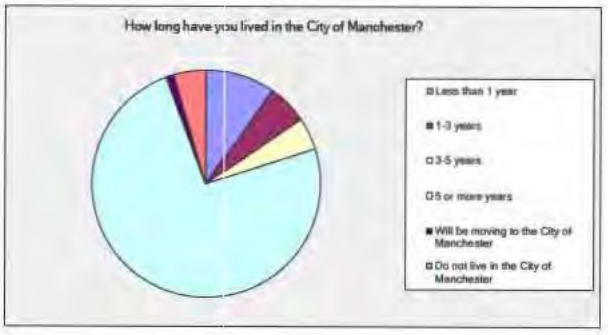
Q11: Does anyone in your household have a handicap or disability?		
Answer Options	Response Percent	Response Count
Yes	28.7%	50
No	71.3%	124
	answered question	174
	skipped question	8



City of Manchester Analysis of Impediments to Fair Housing Choice

Q12: How long have you lived in the City of Manchester?

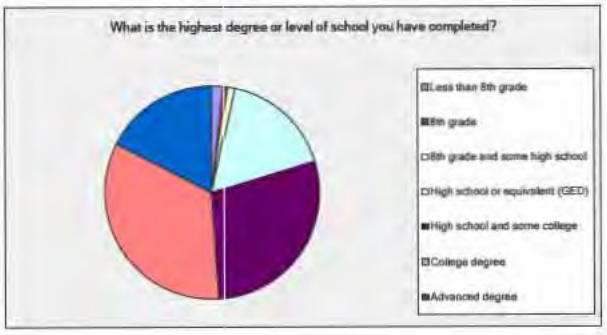
Answer Options	Response Percent	Response Count
Less than 1 year	9.7%	17
1-3 years	5.7%	10
3-5 years	4.6%	8
5 or more years	74.3%	130
Will be moving to the City of Manchester	1.1%	2
Do not live in the City of Manchester	4.6%	8
answered question		175
skipped question		7



City of Manchester Analysis of Impediments to Fair Housing Choice

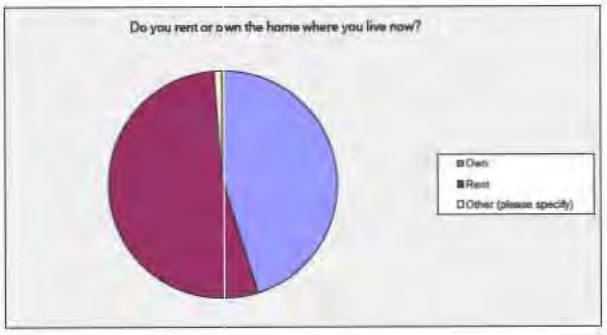
Q13: What is the highest degree or level of school you have completed?

Answer Options	Response Percent	Response Count
Less than 8th grade	1.7%	3
8th grade	0.6%	1
8th grade and some high school	1.1%	2
High school or equivalent (GED)	16.9%	30
High school and some college	28.7%	51
College degree	33.7%	60
Advanced degree	17.4%	31
answered question		178
skipped question		4



City of Manchester Analysis of Impediments to Fair Housing Choice

Q14: Do you rent or own the home where you live now?		
Answer Options	Response Percent	Response Count
Own	45.2%	80
Rent	53.7%	95
Other (please specify)	1.1%	2
	answered question	177
	skipped question	5



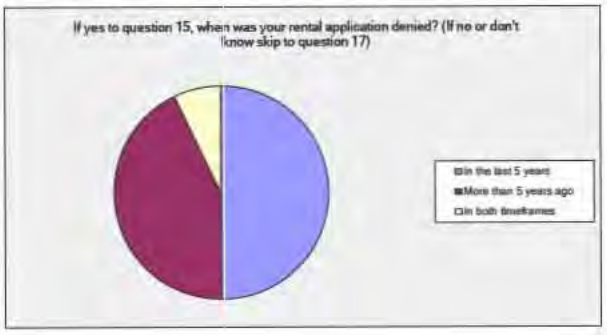
City of Manchester Analysis of Impediments to Fair Housing Choice

Q15: Have you ever been denied an application to rent an apartment or house?		
Answer Options	Response Percent	Response Count
Yes	9.3%	14
No	89.4%	135
Don't know	1.3%	2
Comment		3
answered question		151
skipped question		31

City of Manchester Analysis of Impediments to Fair Housing Choice

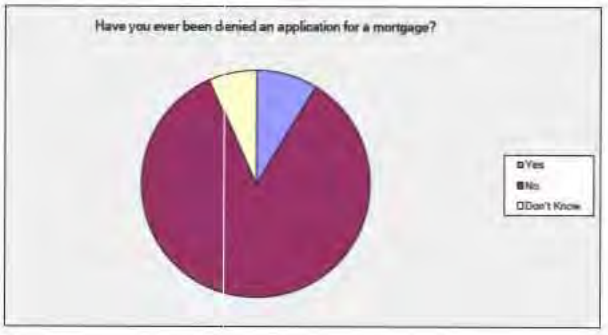
Q16: If yes to question 15, when was your rental application denied? (If no or don't know skip to question 17)

Answer Options	Response Percent	Response Count
In the last 5 years	50.0%	7
More than 5 years ago	42.9%	6
In both timeframes	7.1%	1
answered question		14
skipped question		168



City of Manchester Analysis of Impediments to Fair Housing Choice

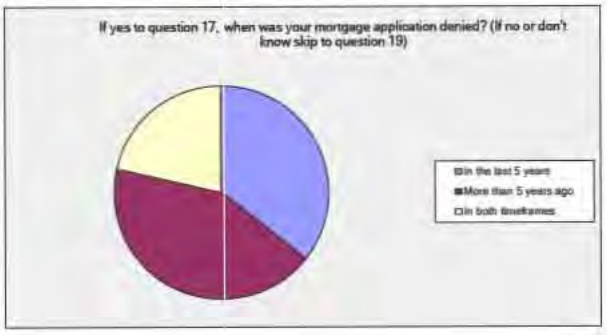
Q17: Have you ever been denied an application for a mortgage?		
Answer Options	Response Percent	Response Count
Yes	8.7%	13
No	84.6%	126
Don't Know	6.7%	10
Comment		7
answered question		149
skipped question		33



City of Manchester Analysis of Impediments to Fair Housing Choice

Q18: If yes to question 17, when was your mortgage application denied? (If no or don't know skip to question 19)

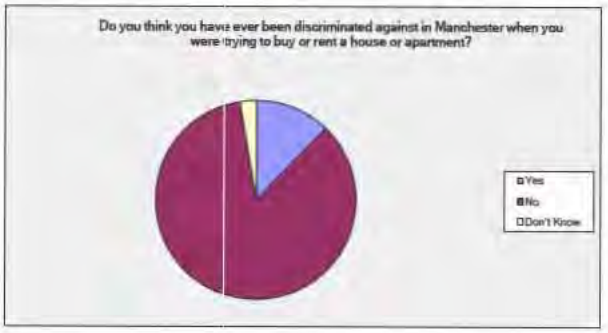
Answer Options	Response Percent	Response Count
In the last 5 years	35.7%	5
More than 5 years ago	42.9%	6
In both timeframes	21.4%	3
answered question		14
skipped question		168



City of Manchester Analysis of Impediments to Fair Housing Choice

Q19: Do you think you have ever been discriminated against in Manchester when you were trying to buy or rent a house or apartment?

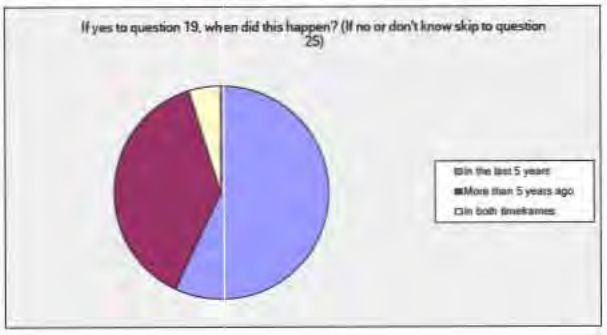
Answer Options	Response Percent	Response Count
Yes	12.2%	18
No	85.0%	125
Don't Know	2.7%	4
Comment		2
answered question		147
skipped question		35



City of Manchester Analysis of Impediments to Fair Housing Choice

Q20: If yes to question 19, when did this happen? (If no or don't know skip to question 25)

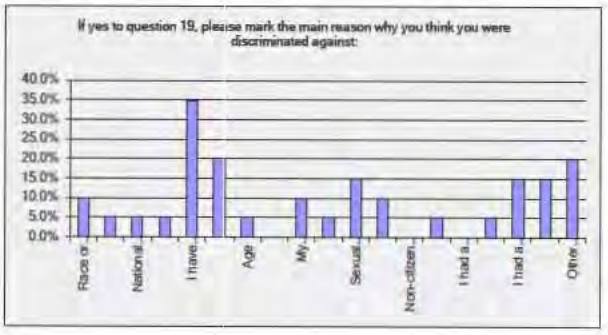
Answer Options	Response Percent	Response Count
In the last 5 years	57.1%	12
More than 5 years ago	38.1%	8
In both timeframes	4.8%	1
answered question		21
skipped question		161



City of Manchester Analysis of Impediments to Fair Housing Choice

Q21: If yes to question 19, please mark the main reason why you think you were discriminated against:

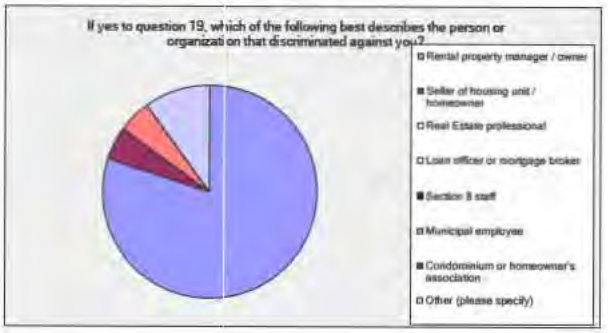
Answer Options	Response Percent	Response Count
Race or ethnicity	10.0%	2
Color	5.0%	1
National Origin	5.0%	1
Gender	5.0%	1
I have children	35.0%	7
Handicap / Disability	20.0%	4
Age	5.0%	1
I was a student	0.0%	0
My occupation	10.0%	2
Religion	5.0%	1
Sexual Orientation	15.0%	3
I was single / not married	10.0%	2
Non-citizen status	0.0%	0
I had an assistance animal	5.0%	1
I had a roommate	0.0%	0
I was not employed	5.0%	1
I had a section 8 voucher	15.0%	3
I did not have enough money	15.0%	3
Other (please specify)	20.0%	4
answered question		20
skipped question		162



City of Manchester Analysis of Impediments to Fair Housing Choice

Q22: If yes to question 19, which of the following best describes the person or organization that discriminated against you?

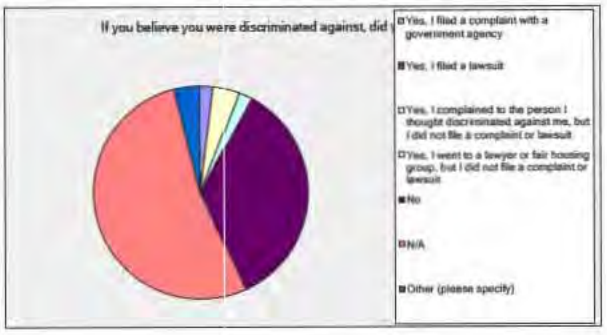
Answer Options	Response Percent	Response Count
Rental property manager / owner	80.0%	16
Seller of housing unit / homeowner	5.0%	1
Real Estate professional	0.0%	0
Loan officer or mortgage broker	0.0%	0
Section 8 staff	0.0%	0
Municipal employee	5.0%	1
Condominium or homeowner's association	0.0%	0
Other (please specify)	10.0%	2
answered question		20
skipped question		162



City of Manchester Analysis of Impediments to Fair Housing Choice

Q23: If you believe you were discriminated against, did you do anything about it?

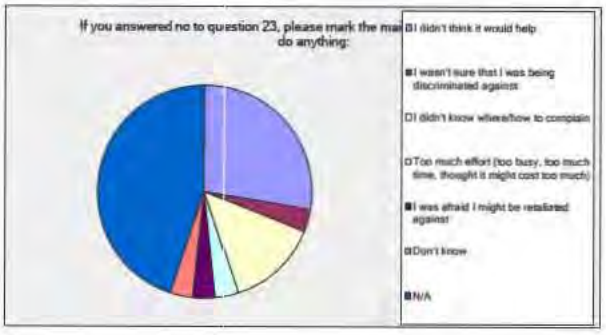
Answer Options	Response Percent	Response Count
Yes, I filed a complaint with a government agency	2.0%	1
Yes, I filed a lawsuit	0.0%	0
Yes, I complained to the person I thought discriminated	3.9%	2
Yes, I went to a lawyer or fair housing group, but I did	2.0%	1
No	35.3%	18
N/A	52.9%	27
Other (please specify)	3.9%	2
answered question		51
skipped question		131



City of Manchester Analysis of Impediments to Fair Housing Choice

Q24: If you answered no to question 23, please mark the main reason why you did not do anything:

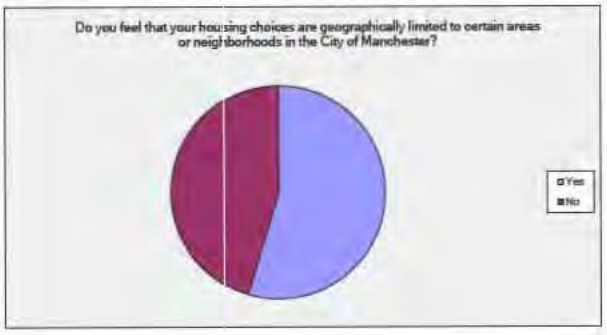
Answer Options	Response Percent	Response Count
I didn't think it would help	27.6%	8
I wasn't sure that I was being discriminated against	3.4%	1
I didn't know where/how to complain	13.8%	4
Too much effort (too busy, too much time, thought it	3.4%	1
I was afraid I might be retaliated against	3.4%	1
Don't know	3.4%	1
N/A	44.8%	13
answered question		29
skipped question		153



City of Manchester Analysis of Impediments to Fair Housing Choice

Q25: Do you feel that your housing choices are geographically limited to certain areas or neighborhoods in the City of Manchester?

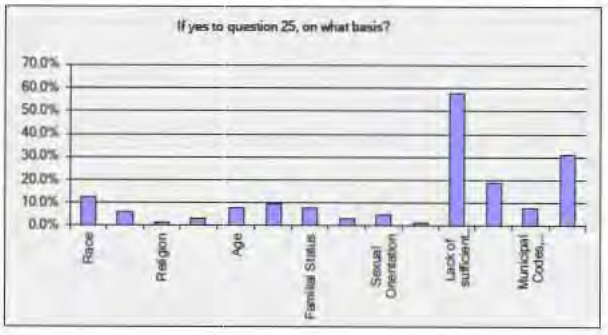
Answer Options	Response Percent	Response Count
Yes	54.7%	81
No	45.3%	67
answered question		148
skipped question		34



City of Manchester Analysis of Impediments to Fair Housing Choice

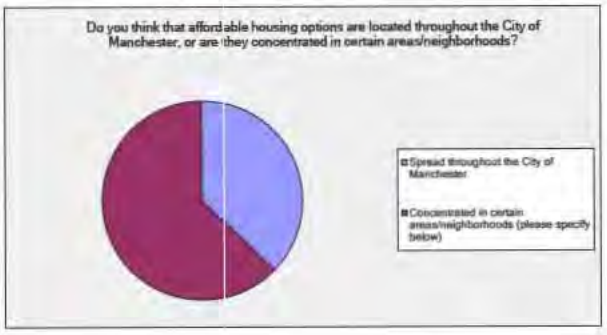
Q26: If yes to question 25, on what basis?

Answer Options	Response Percent	Response Count
Race	12.5%	8
Color	6.3%	4
Religion	1.6%	1
Sex	3.1%	2
Age	7.8%	5
Handicap or Disability	9.4%	6
Familial Status	7.8%	5
National Origin	3.1%	2
Sexual Orientation	4.7%	3
Marital Status	1.6%	1
Lack of sufficient quality affordable housing	57.8%	37
Insufficient public transportation	18.8%	12
Municipal Codes, ordinances, or regulations	7.8%	5
Other (please specify)	31.3%	20
answered question		64
skipped question		118



Q27: Do you think that affordable housing options are located throughout the City of Manchester, or are they concentrated in certain areas/neighborhoods?

Answer Options	Response Percent	Response Count
Spread throughout the City of Manchester	37.3%	44
Concentrated in certain areas/neighborhoods (please	62.7%	74
Comment on areas of concentration if applicable		38
answered question		118
skipped question		64



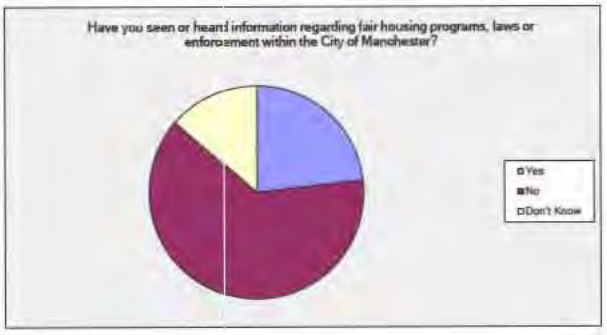
City of Manchester Analysis of Impediments to Fair Housing Choice

Q28: What do you think the biggest impediments or barriers to fair housing choice in the City of Manchester are?	
Answer Options	Response Count
	60
answered question	60
skipped question	122

City of Manchester Analysis of Impediments to Fair Housing Choice

Q29: Have you seen or heard information regarding fair housing programs, laws or enforcement within the City of Manchester?

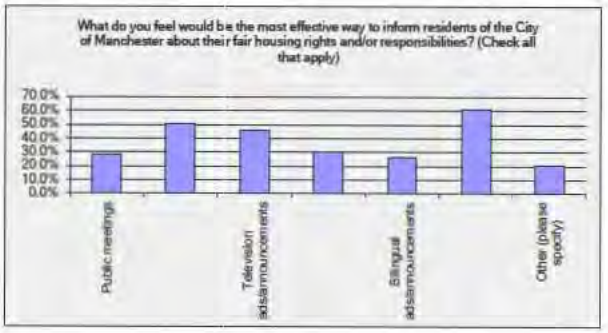
Answer Options	Response Percent	Response Count
Yes	23.2%	29
No	63.2%	79
Don't Know	13.6%	17
answered question		125
skipped question		57



City of Manchester Analysis of Impediments to Fair Housing Choice

Q30: What do you feel would be the most effective way to inform residents of the City of Manchester about their fair housing rights and/or responsibilities? (Check all that

Answer Options	Response Percent	Response Count
Public meetings	28.2%	33
Fair housing literature / information in public libraries	50.4%	59
Television ads/announcements	46.2%	54
Radio ads/announcements	29.9%	35
Bilingual ads/announcements	26.5%	31
Information on the City website	60.7%	71
Other (please specify)	20.5%	24
answered question		117
skipped question		65



City of Manchester Analysis of Impediments to Fair Housing Choice

Q31: Please share any further comments on housing needs and fair housing issues in the City of Manchester	
Answer Options	Response Count
	29
answered question	29
skipped question	153

SURVEY 2

FAIR HOUSING SURVEY FOR HOUSING PROFESSIONALS AND STAKEHOLDERS

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q1: What is the name of your organization?	
Answer Options	Response Count
	5
answered question	5
skipped question	1

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q2: What geographic area(s) do you primarily serve?	
Answer Options	Response Count
	5
answered question	5
skipped question	1

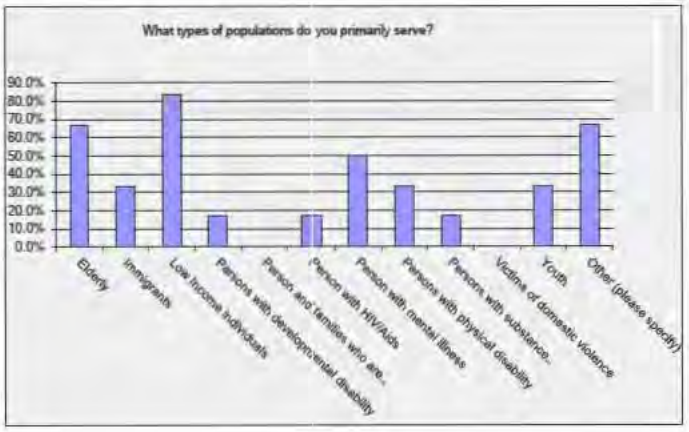
Manchester's west and east side
State of New Hampshire
Manchester, Nahsua, Southern tier
Individuals with Disabilities

31 towns and cities in Southern New Hampshire

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q3: What types of populations do you primarily serve?

Answer Options	Response Percent	Response Count
Elderly	66.7%	4
Immigrants	33.3%	2
Low Income individuals	83.3%	5
Persons with developmental disability	16.7%	1
Person and families who are homeless	0.0%	0
Person with HIV/Aids	16.7%	1
Person with mental illness	50.0%	3
Persons with physical disability	33.3%	2
Persons with substance abuse/addiction	16.7%	1
Victims of domestic violence	0.0%	0
Youth	33.3%	2
Other (please specify)	66.7%	4
answered question		6
skipped question		0



general public
Cover all individuals with diverse disabilities
other
mostly families as opposed to individuals

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q4: In what activities is your organization primarily engaged? Please list the top three activities (e.g., provide fair housing education and training; provide transitional housing to single men, etc.)

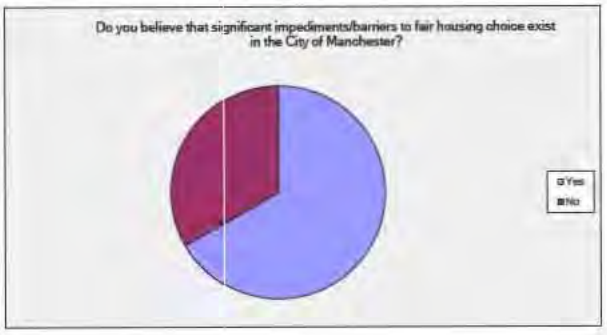
Answer Options	Response Count
	6
answered question	6
skipped question	0

provide English to refugees/immigrants; Citizenship/Civcs; sewing skills; writing resumes and job searches
1. The financing of affordable rental housing. 2. Operation of "balance of state" Housing Choice Voucher Program, 3. Contract administration for the majority of affordable housing projects in the state assisted with HUD funding.
Community Organizing, youth organizing and leadership development
Providing Information and Referrals, Provide educational trainings of diverse topics, advocate for individuals with disabilities
planning, transportaton
Housing Counseling - first time home buyer and foreclosure prevention

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q5: Do you believe that significant impediments/barriers to fair housing choice exist in the City of Manchester?

Answer Options	Response Percent	Response Count
Yes	66.7%	4
No	33.3%	2
Other (please specify)		1
answered question		6
skipped question		0



No specific impediments, however market conditions make housing choices difficult to impossible for some families

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q6: If you answered yes to question 5, please list the impediments/barriers that you are aware of:	
Answer Options	Response Count
	5
answered question	5
skipped question	1

Landlords are not fair to refugees; apartments are not clean, infested with bed bugs, etc.
Know of property owners who are not aware of federal fair housing protections.
Lack of decent, safe and affordable housing discrimination against holders of section 8 vouchers discrimination against immirgants and refugees Poor housing code enforcement
Lack of knowledge by builders and landloards to provide a fair and equal chance to live
na

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q7: In your professional opinion, which population group(s) in the City of Manchester is the most underserved in terms of safe, affordable housing? Rank the top 2, with #1 being the group most

Answer Options	Response Average	Response Total	Response Count
Middle-income persons and families	1.50	3	2
Upper-income persons and families	2.00	2	1
Area workforce (new/existing employees)	.00		0
Elderly and frail elderly	.00		0
Individuals with disabilities	1.50	3	2
Minorities	1.33	4	3
Homeless and/or near homeless	1.50	6	4
		answered question	6
		skipped question	0

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q8: Are there other population group(s) that you feel are underserved in terms of safe, affordable housing in the City of Manchester? If so, please

Answer Options	Response Count
	5
answered question	5
skipped question	1

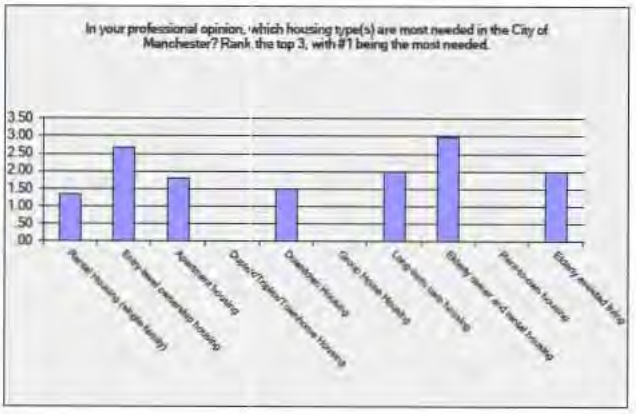
immigrants and refugees
Immigrant minority groups
low income working poor

na
Refugee population has to settle for the worst housing stock in the city.

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q9: In your professional opinion, which housing type(s) are most needed in the City of Manchester? Rank the top 3, with #1 being the most needed.

Answer Options	Response Average	Response Total	Response Count
Rental Housing (single-family)	1.33	4	3
Entry-level ownership housing	2.67	8	3
Apartment housing	1.80	9	5
Duplex/Triplex/Townhome Housing	.00		0
Downtown Housing	1.50	3	2
Group Home Housing	.00		0
Long-term care housing	2.00	2	1
Elderly owner and rental housing	3.00	3	1
Rent-to-own housing	.00		0
Elderly assisted living	2.00	2	1
		answered question	6
		skipped question	0



City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q10: Are there other housing type(s) that are needed in the City of Manchester? If so, please list them.

Answer Options	Response Count
	5
answered question	5
skipped question	1

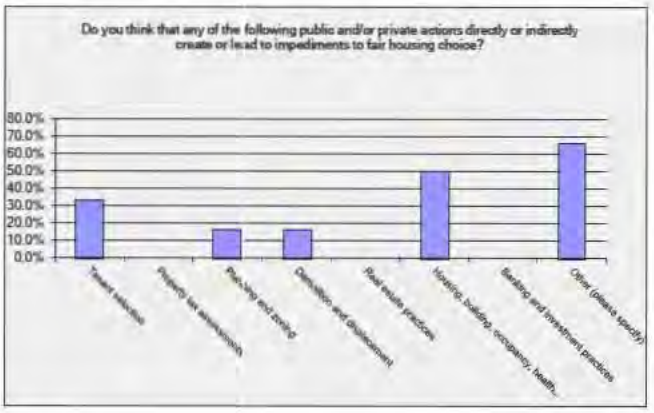
you have covered most of them
Rental housing affordable to extremely low income households, perhaps SRO.
rental housing for large families

na
The city needs a higher percentage of single family ownership. compared to the surrounding region, Manchester provides more than its fair share of the affordable rental and entry level ownership in the area.

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q11: Do you think that any of the following public and/or private actions directly or indirectly create or lead to impediments to fair housing choice?

Answer Options	Response Percent	Response Count
Tenant selection	33.3%	2
Property tax assessments	0.0%	0
Planning and zoning	16.7%	1
Demolition and displacement	16.7%	1
Real estate practices	0.0%	0
Housing, building, occupancy, health and safety codes	50.0%	3
Banking and investment practices	0.0%	0
Other (please specify)	66.7%	4
answered question		6
skipped question		0



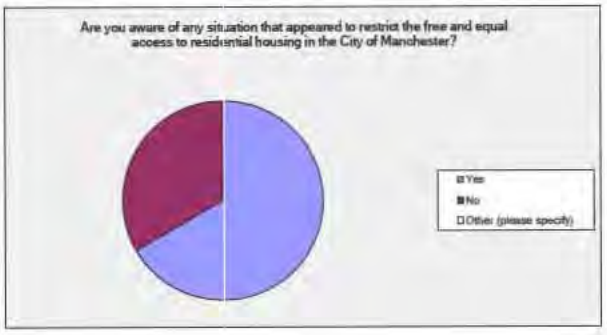
Other:
price of apartments for low income persons

Landlord lack of education/ caring
other
education system - as wealthier households choose to leave the city to live in communities with a better quality education system it leaves the burden of funding the cost of education on the backs of the lower income families who have no choice.

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q12: Are you aware of any situation that appeared to restrict the free and equal access to residential housing in the City of Manchester?

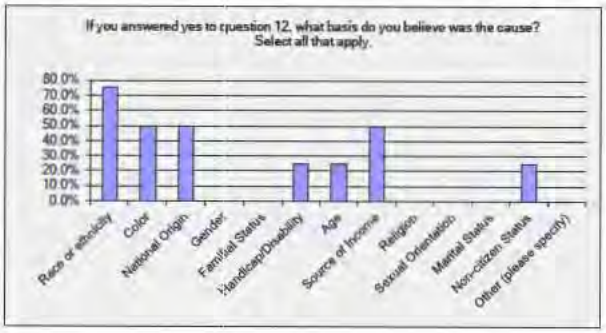
Answer Options	Response Percent	Response Count
Yes	66.7%	4
No	33.3%	2
Other (please specify)	0.0%	0
answered question		6
skipped question		0



City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q13: If you answered yes to question 12, what basis do you believe was the cause? Select all that apply.

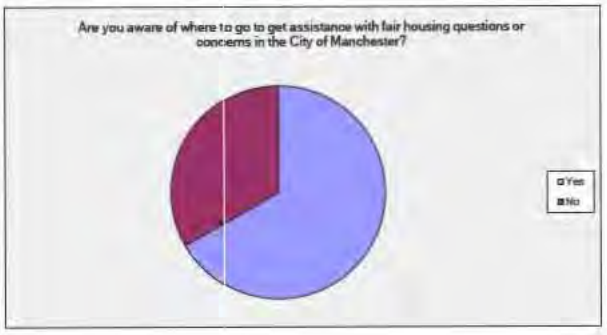
Answer Options	Response Percent	Response Count
Race or ethnicity	75.0%	3
Color	50.0%	2
National Origin	50.0%	2
Gender	0.0%	0
Familial Status	0.0%	0
Handicap/Disability	25.0%	1
Age	25.0%	1
Source of Income	50.0%	2
Religion	0.0%	0
Sexual Orientation	0.0%	0
Marital Status	0.0%	0
Non-citizen Status	25.0%	1
Other (please specify)	0.0%	0
answered question		4
skipped question		2



City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q14: Are you aware of where to go to get assistance with fair housing questions or concerns in the City of Manchester?

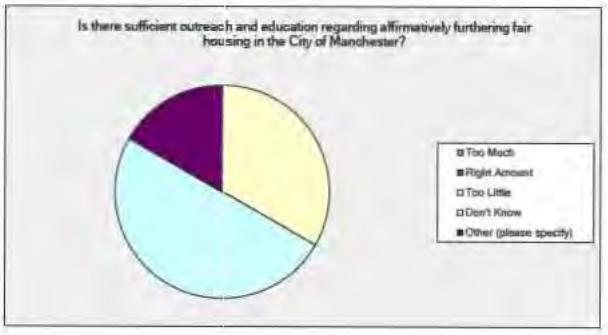
Answer Options	Response Percent	Response Count
Yes	66.7%	4
No	33.3%	2
If yes, please specify the organizations you are aware of:		4
answered question		6
skipped question		0



City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q15: Is there sufficient outreach and education regarding affirmatively furthering fair housing in the City of Manchester?

Answer Options	Response Percent	Response Count
Too Much	0.0%	0
Right Amount	0.0%	0
Too Little	33.3%	2
Don't Know	50.0%	3
Other (please specify)	16.7%	1
answered question		6
skipped question		0



Probably not, there are some very underserved minority and immigrant populations in the city

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q16: In your opinion, what actions should be undertaken in the City of Manchester to address fair housing impediments and/or discrimination?

Answer Options	Response Count
	4
answered question	4
skipped question	2

A lot more education or forums for persons seeking housing.
Rental property owner education. Tenant education

Manchester needs more code enforcement officers. Manchester needs a more robust and proactive approach to code enforcement. Manchester needs to agressively take landlords who violate the codes to court and to collect fees and fines. The City could publicize fair housing rules and encourage people to call with complaints. City code and housing staff needs cultural competency training.
Education mandatory of those who get federal aid to assist indivudals

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q17: Please share any further comments about housing needs and fair housing issues in the City of Manchester:

Answer Options	Response Count
	2
answered question	2
skipped question	4

Code enforcement seems to feel that low income people are lucky to have housing and not care to hold landlords to standards

City of Manchester Fair Housing Choice Survey for Interested Organizations and Professionals

Q18: The Manchester Planning and Community Development Department in partnership with the Southern New Hampshire Planning Commission will hold a meeting of housing professionals and stakeholders in March 2013 to discuss Fair Housing Choice in the City of Manchester. Please leave your email address if you would like to attend this meeting and/or receive further information on the Analysis of Impediments to Fair Housing Choice that is being developed for the City.

Answer Options	Response Count
	4
answered question	4
skipped question	2

MARCH 22, 2013 FOCUS GROUP SUMMARY

CITY OF MANCHESTER, NH
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

MARCH 22, 2013

MEETING NOTES

Attendees

- Jillian Harris, SNHPC
- Katrina Crocker, SNHPC
- Amy Kizak, SNHPC
- Jillian Shedd, Governor's Commission on Disability
- Chris Wellington, NHHFA Consultant
- Paul Martineau, Welfare Commissioner
- Herb Rader, Salvation Army Commanding Officer
- Amy Chhom, Metropolis Property Management (Anagnost Companies)
- Mary Sliney, Executive Director, The Way Home
- Michelle Ducie, Neighborworks Southern New Hampshire
- Kerrie Xintaras, City of Manchester Planning and Community Development
- Todd Fleming, City of Manchester Planning and Community Development

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Welcome and Overview

Jillian Harris, Regional Planner with the Southern New Hampshire Planning Commission (SNHPC) welcomed attendees to the meeting and explained that SNHPC had been asked to help the City update their Analysis of Impediments to Fair Housing Choice (AI). The goal of this meeting was to get input from housing professionals and stakeholders on what their experience is and what the impediments to fair housing choice are in the City. Ms. Harris outlined the agenda for the meeting and asked Todd Fleming from The Planning and Community Development Department to give some background on what the reporting requirements are as an entitlement community to the U.S. Department of Housing and Urban Development (HUD). Mr. Fleming explained that the Analysis of Impediments was required along with the Consolidated Plan and an Annual Action Plan which basically outline how HUD funds will be expended and how the city will "affirmatively further fair housing."

City of Manchester Fair Housing Background and Profile

Ms. Harris gave an overview of the process for updating the AI and explained that along with data and analysis, a survey of both residents and housing professionals and stakeholders had been conducted to get feedback on fair housing choice in the City.

Ms. Harris presented a powerpoint with data and statistics that outlined a demographic and housing profile for the City, along with the results of the surveys conducted. Maps were distributed that presented an analysis of the following:

Map 1 – Low-Moderate Income Census Tracts
Map 2 – Areas of Minority Concentration
Map 3-7 – Individual Race Areas of Concentration
Map 8 – Low-Moderate Income and Minority Concentration
Map 9 – Percentage of Individuals at or below the Poverty Level
Map 10 – Low-Moderate Income Areas and location of Assisted Housing
Map 11 – Poverty percentage and location of assisted housing

Survey results of significance were noted as follows:

- 9.3 % of respondents noted that they had been denied an application to rent an apartment or house in the City, 1 out of 14 of those denied was a minority
- 8.8% of respondents noted that they had been denied an application for a mortgage in the City, 2 out of 13 of those denied was a minority.
    - Incomes ranged for both renter denials and mortgage denials but the majority were less than $30,000
- 11.6% of respondents noted that they believed they had been discriminated against when trying to buy or rent a house or apartment
    - The main reasons why they believed they had been discriminated against were familial status, handicap/disability, race, and source of income
- 54.8% believed that housing choices are geographically limited to certain areas of the City. Majority cited lack of sufficient quality affordable housing as the biggest reason they feel housing choices are geographically limited to certain areas of the City
- Majority felt that affordable housing options are concentrated in certain areas/neighborhoods in the City.
- Respondents answers to what they felt were the biggest impediments to fair housing choice ranged, but included the following:
    - Landlords/slumlords
    - Lack of information and assistance
    - Lack of accessible housing
    - Cost / prices and rents are too high
    - Poor quality of affordable housing
    - Lack of public transport
    - Safety/crime issues
    - Discrimination/racism

Majority of respondents had not heard or seen information regarding fair housing programs, laws or enforcement
Ms. Harris, when asked, offered to distribute her PowerPoint presentation and noted that all the information will be contained in the Manchester AI report.

Impediments to Fair Housing Choice

Ms. Harris facilitated a discussion on what the current impediments to fair housing choice were in the City. Information was presented on what the previous impediments were cited in the last AI update, along with HUD feedback on the previous AI and suggestions for improvement. The impediments were discussed:

- Public transportation and lack of services – lack of public transportation and inadequate public transport schedules is an impediment to living outside of the inner city. Outside of the inner city there may not be enough services available to meet the needs of all population sectors.
- Adequate housing availability – absentee property owners may not maintain dwellings up to adequate standards and there is a lack of adequate, affordable housing for all population sectors. Apartments in need of renovation may be owned by underwater landlords.
- Housing for Older Persons - Affordable and assisted housing developments may disproportionately be available only to the senior population
- Cost – Rents and housing prices are too high for low-moderate income renters and buyers to move outside of the inner city
- Safety / Crime – there is a limited supply of rental housing that is in safe areas with low crime rates
- New development- Large for-profit development no longer receives NH Housing tax credits since they do not offer social services as small non-profits do. Opportunities for rehabilitation of existing buildings are lost since New Hampshire doesn't have a rehabilitation program and there are difficult re-financing requirements. Also, not all housing authorities in different towns know how to plan a project with built-in assistance.
- Predatory lending- no longer an issues as it was in the past.
- Mortgage-lending practices – Mortgage lenders have increased requirements for obtaining a mortgage in the wake of the economic recession and made it harder to obtain a mortgage Discrimination – testing done by NHLA has revealed that there are still some significant discrimination issues with certain property owners in the City – mostly those who own smaller properties and not large companies who are educated and informed of fair housing laws and regulations. Lack of information and education for both landlords and tenants is cited as a barrier that may increase discrimination in the City.
- Cultural / Language Barriers – Anecdotal evidence of cultural and language barriers exists, along with a lack of information on fair housing laws and regulations. Cost of translation services and lack of translation resources is an issue for housing providers in the City.
- Knowledge of housing alternatives- knowledge of housing opportunities among populations seeking affordable housing often spreads by word of mouth; prospective new renters lack knowledge of alternative housing options. Anecdotal evidence suggests that organizations that direct immigrant community members and others to affordable housing may themselves only be aware of the same

housing provided by the same landlords they've worked with over the years since they do not have funding for outreach to new landlords.

- Knowledge of tenant rights- Additionally, vulnerable populations such as young people leaving the foster care system lack information on their rights as tenants and may not think that they will be able to acquire better housing or ask for their landlord to fix major housing quality problems. Complete knowledge of all available social services generally is also not widely known; even among organizations who reach out to populations in needs of services (NeighborWorks has a helpful brochure).
- Racial segregation – public transportation, services, cost, mortgage-lending practices, discrimination and cultural/language barriers all play a role in leading to racial segregation in the City
- Economic opportunity – with a large proportion of the jobs and services available in the region located in the City, along with that people inevitably want to live in the City close to those jobs and services

Next Steps

A summary of this meeting, along with the powerpoint will be distributed to participants by Jillian Harris, SNHPC. The Analysis will be finalized and available for public comment and review in April 2013. Participants are encouraged to participate in the Regional Fair Housing Equity Assessment process that SNHPC will be working on this year.