

**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE
TOWN OF GREENWICH, CT**

**PREPARED BY:
THE COMMUNITY DEVELOPMENT OFFICE
OF THE TOWN OF GREENWICH**

**IN CONNECTION WITH THE
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

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I. INTRODUCTION

WHAT IS THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE?

The Town of Greenwich (Town), as a federal U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) Program entitlement grantee, is required to affirmatively further fair housing under Section 808 of the Fair Housing Act of 1968. Through its Community Planning and Development programs HUD's goal is to expand mobility and widen a person's freedom of housing choice.

The Analysis of Impediments (AI) is defined as a review and identification of any impediments to fair housing choice in the public and private sector within the Town. The AI will be updated and reevaluated annually as part of the Annual Action Plan allocation process. The analysis involves:

- Comprehensive reviews of the Town's laws, regulations, and administrative policies, procedures, and practices;
- Assessment of how these laws, regulations, policies, procedures and practices affect the location, availability, and accessibility of housing; and
- Assessment of conditions, both public and private, affecting fair housing choice for all protected classes.

As part of the Five-Year Consolidated Plan, covering the period between July 1, 2020 and June 30, 2025, the Town of Greenwich shall submit a certification that the Town will affirmatively further fair housing (AFFH). To meet this certification of AFFH, the Town must:

1. Conduct an analysis to identify impediments to fair housing choice within the Town;
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
3. Maintain records reflecting the analysis and actions taken in this regard.

In addition, the objectives of the AFFH are as follows:

- Identify and address any potential impediments to fair housing choice that may lead to housing discrimination issues;
- Promote fair housing choice for all persons;
- Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

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; or

- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

RESPONSIBLE ENTITY

This AI was conducted and produced by the Community Development Office of the Town of Greenwich to update the previously submitted and approved 2015 AI, and to comply with the regulations and guidelines set forth by HUD in administering the CDBG Program. The CDBG Program provides annual grants on a formula basis to states, cities and counties to develop viable urban communities by providing decent housing, a suitable living environment and expanded economic opportunities, principally for low- and moderate-income people.

PURPOSE

The Town AI is to serve as the substantive basis for its fair housing planning; to provide essential and detailed information to policy makers, staff and other stakeholders; and assist in building support for fair housing efforts in the Town of Greenwich. Information contained in this AI is intended to increase equal and free access to residential housing, and to identify both fair housing problems and the resources available to solve them. This document will also serve as a guide for the Town to implement and maintain policies and procedures related to its efforts to affirmatively further fair housing.

PUBLIC PARTICIPATION PROCESS

The Town of Greenwich engaged community stakeholders through its coterminous Five-year Consolidated Plan and Analysis of Impediments to Fair Housing outreach process. Through meetings, public hearings and an online community needs assessment survey beginning in February 2020, the Town sought input from those most knowledgeable about the needs and resources in Greenwich. The public participation process was inclusive of the following meetings, hearings and opportunities for input from members of the public:

- Publication of the Citizen Participation Calendar on the Town's website on January 10, 2020, with a notice of funding availability advertised in the *Greenwich Time* and via direct email to local nonprofits and community partners.
- Availability of the Community Development Office's "Citizen Input Sheet," published on the Town's website on January 10, 2020 and remaining available through the end of the 2020 planning and allocation process in June.
- Online community needs survey posted on the Town's website and promoted through the Town's social media/direct email outlets running from February 28, 2020 through March 27, 2020.
- Public meeting of the Community Development Advisory Committee on February 18, 2020.
- Community Development Advisory Committee public hearing on March 12, 2020.

- Public virtual meeting of the Community Development Advisory Committee on April 22, 2020.
- Public virtual hearing with the First Selectman on April 29, 2020.
- Public virtual hearing with the Board of Estimate and Taxation on May 18, 2020.
- Public virtual hearing with the Representative Town Meeting on June 8, 2020.

FUNDING FOR THE AI

There were no additional or special funds utilized for this AI. All of the necessary expenditures to conduct and produce this analysis were absorbed within the Community Development Office's CDBG planning and administrative budget.

DATA SOURCES

The information collected, reviewed and analyzed for this AI was obtained through data available from the following sources:

- U.S. Census Bureau
- U.S. Department of Housing and Urban Development Field Office Data
- Town of Greenwich 2019 Plan of Conservation and Development prepared by the Planning and Zoning Department of the Town of Greenwich
- 2019 Greenwich, CT Town Profile by CERC, produced by the Connecticut Data Collaborative
- Town of Greenwich 2020 Community Needs Assessment survey

While this AI is being completed prior to the conclusion of the 2020 U.S. Census, the Town will update data included herein accordingly once 2020 Census data is available. The Town will also incorporate other relevant data sources in its annual AI updates as they become available.

II. TOWN PROFILE

The Town of Greenwich, Connecticut is located in southwestern Fairfield County. Greenwich lies on the southwest border of the state, bounded on the west and north by Westchester County, New York; on the east by the city of Stamford; and on the south by Long Island Sound. Greenwich was the tenth town established in Connecticut between 1633 and 1640. Greenwich is just 28 miles northeast of New York City, and next door to the business center of Stamford, CT.

The Town is primarily a residential community of approximately 62,782 people (per American Community Survey 2017 five-year estimates), consisting of diverse neighborhoods, each with its own personality and flavor. There are several parks, a strong school system, expanding recreational opportunities, and a variety of community social and health service agencies.

Greenwich is also on the main line of the Metro-North Railroad. Highways traversing Greenwich are the New England Turnpike (I-95), Boston Post Road (U.S. Highway #1), and the Merritt Parkway. Although Greenwich has no airports, there are three airports within close proximity (Westchester County, LaGuardia, and Kennedy Airports). Greenwich's proximity to a major metropolitan city and access to transportation make it an ideal commuter community.

SYSTEM OF GOVERNMENT

The Town has multiple government bodies. There is an elected Board of Selectmen (BOS) headed by the First Selectman. In addition, there is an elected twelve-member Finance Board known as the Board of Estimate and Taxation (BET). Finally, there is a Legislative body known as the Representative Town Meeting (RTM) consisting of 230+ members elected to represent the twelve districts of Greenwich. Further, state statutes and an adopted Plan of Conservation and Development govern the Planning and Zoning Commission.

DEMOGRAPHIC DATA

The 2017 American Community Survey estimated the Town population to be 62,782. Median age of the Greenwich populations has been trending up since 1980:

Median Age

1980	38.7
1990	39.9
2000	40.2
2010	42.8
2017	42.6

Source: U.S. Census Bureau, 2010 and 2013-2017 ACS 5-Year Estimates

The following table shows the population changes in Town (by gender):

Population by Gender

Greenwich	2010	2017	% (+ or -)
Males	29,119	30,067	+0.03%
Females	32,052	32,715	+0.02%
Total	61,171	62,782	0.02%

Source: U.S. Census Bureau, 2010 and 2013-2017 ACS 5-Year Estimates

The below table shows residential growth by race and ethnicity. The data shows that those who consider themselves to be of White race had a 3.54% decrease from 55,001 in 2000 to 53,054 in 2010. Thus, there was an overall increase reported for all other races. Asians continue to be the second largest population in Greenwich in terms of race. The Town’s ethnicity makeup has become more diverse. The Hispanic/Latino residents reported an increase of 55.07% from 3,846 in 2000 to 5,964 in 2010.

Population by Race/Ethnicity

Race	2010	2017	% (+ or -)
White	53,054	52,796	-0.49%
Black or African American alone	1,314	2,045	+55.63%
American Indian and Alaska Native	84	76	-9.52%
Asian alone	4,053	4,886	+20.55%
Some Other Race alone	2,666	1,159	-56.53%

Ethnicity	2010	2017	% (+ or -)
Hispanic or Latino (of any race)	5,964	7,994	+34.04%

Source: U.S. Census Bureau, 2010 and 2013-2017 ACS 5-Year Estimates

Connecticut’s Latino population grew by more than 50% between 2000 and 2012, and as of the 2010 U.S. Census Connecticut had the eleventh highest percentage of Hispanic/Latino residents in the nation. Per the Hispanic Federation’s “Latino Connecticut: A Call to Action,” the state’s reputation for quality public schools, world-class colleges and universities, state-of-the-art healthcare facilities and financial sector growth have driven increases in Hispanic/Latino residents, however the economic windfall and higher-than-average median income have not been shared equally.

The following table shows the age distribution in 2010 and 2017 as a percent of the total population:

Age Distribution

Age Breakdown	2010	2017
0-17 years old	26.7%	31.2%
18-64 years old	56.8%	52.0%
65+	16.5%	16.8%

Source: U.S. Census Bureau, 2010 and 2013-2017 ACS 5-Year Estimates

INCOME DATA

The Town of Greenwich is included in the Stamford-Norwalk HUD Metro FMR Area (along with Darien, New Canaan, Norwalk, Stamford, Weston, Westport and Wilton). The HUD median income for a four-person household in this FMR Area is \$144,300 for 2019. The 2019 CERC Town Profile of Greenwich, using data from 2013-2017, has the Greenwich median household income as \$138,180 (compared to \$89,773 for the county and \$73,781 for the state).

EMPLOYMENT DATA

	Town	County	State
Residents employed	27,989	461,750	1,827,070
Residents unemployed	890	19,017	78,242
Unemployment rate	3.1%	4.0%	4.1%
Self-employed rate	15.9%	13.0%	10.0%
Total employers	4,115	36,389	122,067

Source: CERC Greenwich Profile 2019, produced by the Connecticut Data Collaborative

HOUSING PROFILE

According to the 2013-2017 American Community Survey 5-Year Estimates, there were a total of 24,617 housing units in Greenwich at the time. Following is the breakdown of all housing units in Greenwich by Tenure:

Housing Occupancy

Total housing units	24,617
Occupied housing units	22,284
Vacant housing units	2,333
Owner-occupied units	14,874
Renter-occupied units	7,410
Homeowner vacancy rate	2.5%
Rental vacancy rate	4.3%

Average household size of owner-occupied unit	2.94
Average household size of owner-occupied unit	2.46

Source: U.S. Census Bureau, 2010 and 2013-2017 ACS 5-Year Estimates

Units in Structure

Total Housing Units	24,617
One room	334
Two rooms	540
Three rooms	1,728
Four rooms	2,677
Five rooms	3,052
Six rooms	2,677
Seven rooms	2,413
Eight rooms	2,495
Nine or more rooms	8,711
Median room count	7.0

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

Bedrooms in Structure

Total Housing Units	24,617
No bedroom	388
One bedroom	2,512
Two bedrooms	4,708
Three bedrooms	6,120
Four bedrooms	5,382
Five or more bedrooms	5,507

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

Occupants per Room

Occupied housing units	22,284
1.00 or less	21,960
1.01-1.50	291
1.51 or more	33

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

A high percentage of dwellings with three or more bedrooms (69% of all housing units in Greenwich have at least three bedrooms) and few instances of overcrowding are typically desirable conditions, however they are reflective of the challenge that lower-income households face in securing housing.

The following table shows the residential data for Greenwich per the 2019 CERC Town Profile:

Existing Units	24,617
Owner-occupied Dwellings	14,874
As % of Total Dwellings	66.8%
% Single Unit (2013-17)	64%
New Permits Authorized (2017)	250
As % of Existing Units	1%
Demolitions (2017)	119
Home Sales (2017)	442
Median Price	\$1,217,500
% Pre-1950 Housing	35.7%
Subsidized Housing Units	1,297

Source: CERC Greenwich Profile 2019, produced by the Connecticut Data Collaborative

SALES PRICE/HOUSING COST DATA

Per the 2019 CERC Town Profile of Greenwich, the media price of a home in Greenwich was \$1,217,500. The median price during the same period for Fairfield County was \$417,800 and the median price for the State of Connecticut was \$270,100.

Mortgage Status

Owner-occupied housing units	14,874
Housing units with a mortgage	9,247
Housing units without a mortgage	5,627

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

Selected Monthly Owner Costs

Housing units with a mortgage	9,247
Less than \$500	66
\$500 to \$999	91
\$1,000 to \$1,499	326
\$1,500 to \$1,999	569
\$2,000 to \$2,499	602
\$2,500 to \$2,999	748
\$3,000 or more	6,845

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

Gross Rent

Occupied units paying rent	6,964
Less than \$500	421
\$500 to \$999	577
\$1,000 to \$1,499	1,125
\$1,500 to \$1,999	1,745
\$2,000 to \$2,499	1,375
\$2,500 to \$2,999	516
\$3,000 or more	1,205
No rent paid	446
Median rent cost (dollars)	\$1,889

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

Gross Rent Paid as a Percentage of Income (GRAPI)

Occupied units paying rent (excluding units where GRAPI cannot be calculated)	6,847
Less than 15%	1,546
15.0% to 19.9%	637
20.0% to 24.9%	790
25.0% to 29.9%	597
30.0% to 34.9%	664
35.0% or more	2,613
\$3,000 or more	1,205
Not computed	563

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

COST BURDEN

The conventional public policy indicator for housing affordability in the United States is percentage of income spent on housing. Housing expenditures exceeding 30% of a household's income have historically been viewed as an affordability problem. This percentage has evolved to apply to homeowner housing as well as rental housing.

The tables below detail cost burdened households in the Town of Greenwich:

Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	445	310	249	1,004	275	204	255	734
Large Related	50	79	30	159	29	65	35	129
Elderly	430	133	20	583	617	419	168	1,204
Other	370	133	95	598	114	92	58	264
Total need by income	1,295	655	394	2,344	1,035	780	516	2,331

Source: U.S. Census Bureau 2011-2015 ACS, via HUD IDIS

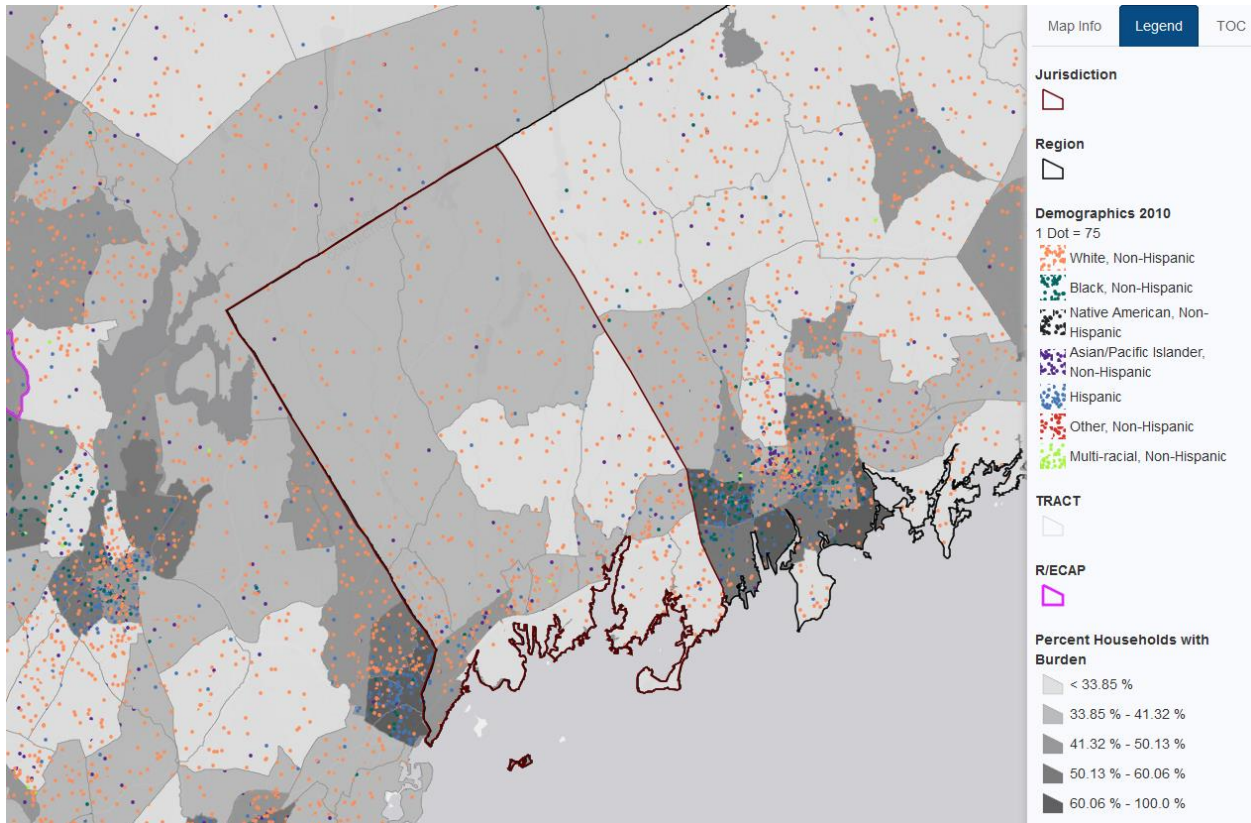
Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	340	115	24	479	265	155	160	580
Large Related	30	19	0	49	29	50	20	99
Elderly	375	75	0	450	555	245	64	864
Other	335	75	10	420	114	84	38	236
Total need by income	1,080	284	34	1,398	963	534	282	1,779

Source: U.S. Census Bureau 2011-2015 ACS, via HUD IDIS

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	14,265	3,660	3,913	230
White	11,745	2,724	2,905	215
Black / African American	215	130	195	0
Asian	980	213	253	20
American Indian, Alaska Native	0	25	0	0
Pacific Islander	20	0	0	0
Hispanic	1,175	545	505	0

Source: U.S. Census Bureau 2011-2015 ACS, via HUD IDIS



Source: HUD AFFH Mapping Tool, Accessed March 25, 2020

FAIR MARKET RENT

The Town of Greenwich is included in the Stamford-Norwalk HUD Metro FMR Area (along with Darien, New Canaan, Norwalk, Stamford, Weston, Westport and Wilton). The HUD fair market rents for this area are as follows:

Unit Size	2020 FMR
Efficiency	\$1,356
One-Bedroom	\$1,701
Two-Bedroom	\$2,079
Three-Bedroom	\$2,616
Four-Bedroom	\$2,926

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

HOUSING PROBLEMS

As per the definition used by CHAS, a household is considered to have a housing problem when one of the following issues exists in the house: incomplete kitchen; incomplete plumbing facilities; more than 1 person per room; and cost burden is greater than 30%. According to the CHAS data (2007-2011 ACS), there are a total of 8,075 households with any housing problem. Of the 8,075 households, 5,565 are owner households while 2,510 are renter households. The following table lists the number of households that experience any housing problems:

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	34	0	20	0	54	4	14	0	0	18
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	20	0	0	20	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	75	55	20	10	160	0	0	0	19	19
Housing cost burden greater than 50% of income (and none of the above problems)	990	290	29	64	1,373	960	525	279	190	1,954

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	165	334	355	264	1,118	79	259	245	290	873
Zero/negative Income (and none of the above problems)	115	0	0	0	115	120	0	0	0	120

Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	1,105	365	69	69	1,608	970	540	279	210	1,999
Having none of four housing problems	504	600	664	570	2,338	165	590	540	715	2,010
Household has negative income, but none of the other housing problems	115	0	0	0	115	120	0	0	0	120

Crowding (more than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	55	55	20	0	130	0	4	0	4	8
Multiple, unrelated family households	20	20	0	10	50	0	0	0	15	15
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	75	75	20	10	180	0	4	0	19	23

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,310	423	235
White	1,535	328	215
Black / African American	170	35	0
Asian	139	40	20
American Indian, Alaska Native	10	0	0
Pacific Islander	0	0	0
Hispanic	444	10	0

Source: 2011-2015 CHAS, via HUD IDIS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,499	605	0
White	1,068	430	0
Black / African American	55	10	0
Asian	64	39	0
American Indian, Alaska Native	15	0	0
Pacific Islander	0	0	0
Hispanic	294	70	0

Source: 2011-2015 CHAS, via HUD IDIS

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	945	604	0
White	615	439	0
Black / African American	55	55	0
Asian	95	4	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	164	100	0

Source: 2011-2015 CHAS, via HUD IDIS

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	839	740	0
White	609	615	0
Black / African American	10	0	0
Asian	73	69	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	140	38	0

Source: 2011-2015 CHAS

SEVERE HOUSING PROBLEMS

As per the definition used by CHAS, a household is considered to have a severe housing problem when one of the following issues exists in the house: incomplete kitchen; incomplete plumbing facilities; more than 1 person per room; and cost burden is greater than 50%. According to the CHAS data (2007-2011 ACS), there are a total of 4,280 households with severe housing problem. Of the 8,070 households, 2,915 are owner households while 1,365 are renter households. The following table lists the number of households that have severe housing problems:

All Households with Severe Housing Problems

Households with Severe Housing Problems	Owner	Renter	Total
Household has 1 of 4 Severe Housing Problems	2,915	1,365	4,280
Household has none of 4 Severe Housing Problems	13,045	4,755	17,800
Cost Burden not available	90	75	165
Total	16,055	6,195	22,250

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,075	669	235
White	1,460	407	215
Black / African American	135	75	0
Asian	129	50	20
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	349	105	0

Source: 2011-2015 CHAS, via HUD IDIS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	905	1,190	0
White	685	814	0
Black / African American	20	45	0
Asian	49	54	0
American Indian, Alaska Native	0	15	0
Pacific Islander	0	0	0
Hispanic	150	209	0

Source: 2011-2015 CHAS, via HUD IDIS

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	348	1,204	0
White	254	814	0
Black / African American	0	110	0
Asian	24	69	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	54	210	0

Source: 2011-2015 CHAS, via HUD IDIS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	279	1,285	0
White	214	990	0
Black / African American	10	0	0
Asian	14	123	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	30	148	0

Source: 2011-2015 CHAS, via HUD IDIS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Selected Housing Problems

Occupied housing units	22,284
Lacking complete plumbing facilities	41
Lacking complete kitchen facilities	276
No telephone service available	194

Source: U.S. Census Bureau 2013-2017 ACS 5-Year Estimates

HOUSING AUTHORITY OF THE TOWN OF GREENWICH

The Housing Authority of the Town of Greenwich (HATG) is an independent entity from Town government, but coordinates with Town departments and initiatives to provide housing to some of the most vulnerable residents. In total, the HATG owns or manages 1,220 housing units, including 343 tenant-based vouchers. Also managed by the Housing Authority are special purpose housing vouchers, including five for veterans and 78 for disabled residents. 200 of the HATG's units are set aside for the elderly and/or disabled.

The average income of residents in units managed by the HATG is \$19,401, while the average income of tenant-based voucher holders is \$29,833.

III. Evaluation of the Town's Current Fair Housing Legal Status

FAIR HOUSING COMPLAINTS RECEIVED BY HUD

The information below was provided to the Town of Greenwich by the HUD Office of Fair Housing and Equal Opportunity in the Boston Field Office.

Filed Cases Involving Greenwich

Metrics	Number of Filed Cases									
	2015		2016		2018		2020		Total	
CY Filed	FHAP	Total	FHAP	Total	FHAP	Total	HUD	Total		
Discriminatory refusal to rent	-	-	-	-	1	1	-	-	1	
Discriminatory brokerage service	-	-	-	-	1	1	-	-	1	
Discriminatory terms, conditions, privileges, or services and facilities	1	1	1	1	1	1	-	-	3	
Other discriminatory acts	-	-	1	1	-	-	-	-	1	
Discriminatory acts under Section 818 (coercion, Etc.)	1	1	1	1	1	1	-	-	3	
Failure to make reasonable accommodation	-	-	-	-	-	-	1	1	1	
Filed Cases	1	1	1	1	1	1	1	1	4	

Completed Cases Involving Greenwich

Metrics	CY Completed	2016		2017		2019		Total
	Completion Disposition	FHAP	Total	FHAP	Total	FHAP	Total	
Number of Filed Cases	Charged or FHAP Caused	-	-	-	-	1	1	1
Number of Filed Cases	Conciliation/Settlement	1	1	-	-	-	-	1
Number of Filed Cases	No Cause	-	-	1	1	-	-	1
Number of Filed Cases	Total	1	1	1	1	1	1	3
Compensation Amount	Charged or FHAP Caused	-	-	-	-	-	\$0	\$0
Compensation Amount	Conciliation/Settlement	\$308	\$308	-	-	-	-	\$308
Compensation Amount	No Cause	-	-	-	\$0	-	-	\$0
Compensation Amount	Total	\$308	\$308	\$0	\$0	\$0	\$0	\$308
Victims' Funds Amount	Charged or FHAP Caused	-	-	-	-	-	\$0	\$0
Victims' Funds Amount	Conciliation/Settlement	\$0	\$0	-	-	-	-	\$0
Victims' Funds Amount	No Cause	-	-	-	\$0	-	-	\$0
Victims' Funds Amount	Total	\$0	\$0	\$0	\$0	\$0	\$0	\$0

FAIR HOUSING COMPLAINTS RECEIVED BY THE TOWN OF GREENWICH

The Office of the First Selectman, the Law Office and the Community Development Office did not receive any fair housing complaints from 2015 to 2020. The Planning and Zoning Office had one case filed against it involving a lottery for an affordable apartment. An applicant for a set-aside affordable apartment in a building owned by Old Track Properties and managed by Greenwich Premier Services filed a complaint with the Commission on Human Rights and Opportunities (CHRO) claiming that she was discriminated against on the basis of race. The applicant was third in line for the unit in a computer generated drawing, however the first applicant selected took the unit. The applicant also filed a claim against the owner and manager of the apartment complex, however the claim was not joined with that against the Town at any point in the process.

Without notice to the respondents in either of the cases, the investigator joined the cases in a decision concluding that there was a statistical probability of discrimination on the basis of race without distinguishing between the Town and the owner/manager as to liability. The case was then sent to the State's Attorney's Office to commence action in Superior Court. The attorney to whom the case was assigned determined that there was an error in the handling of the case, declined to comment on the requested action and in July 2019 sent the case back to CHRO for further investigation and findings. The Town has not heard anything about the case since that time. The Town maintains that because the person filing the complaint was entered into the lottery for the apartment, the claim of discrimination is nonexistent.

RESULTS OF COMMUNITY NEEDS ASSESSMENT SURVEY

As part of its 2020 Consolidated Plan/Annual Action Plan process for CDBG, and in addition to the public outreach and engagement outlined on page 5 of this AI, the Town of Greenwich created a community needs assessment survey that was published online and was disseminated to the community through targeted emails to service and housing providers, as well as email blasts from the Office of the First Selectman and prominent position on the Town's website homepage. Included in the survey were questions about fair housing, the results of which were as follows:

	Yes	No	Skipped Question
Have you experienced housing discrimination in Greenwich?	8	96	2

	Realtor	Landlord	Other	N/A
If yes, who do you believe	2	5	1	1

discriminated against you?				
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	Race	National Origin	Family Status	Sexual Orientation	Gender	Disability	Other/ N/A
If yes, on what basis do you believe you were discriminated against?	1	1	2	1	1	2	3

**Some respondents selected multiple bases of discrimination.*

If you believe you were discriminated against did you report it? If not, why?	No. No burden of proof. Did not record them in the act.
	No. Moved on.
	No. What good would it do.
	No. Found another place to rent.
	No. Concerned about retaliation.
	Yes.

In addition to including links to the community needs assessment survey on the Town homepage and through the First Selectman’s Office weekly email update to residents, the Community Development Office encouraged its program partners to promote the survey to the clients they serve on a daily basis. Among the CDBG-funded organizations included as part of the community needs outreach that provide housing and housing services were Abilis, the HATG, Inspirica, Pacific House and Pathways.

TRENDS OR PATTERNS

Due to the small number of complaints filed, the Town cannot identify a specific trend or pattern that may cause fair housing issues. The Town shall continue to monitor fair housing complaints. Of the eight respondents to the 2020 community needs assessment survey who indicated that they felt they were discriminated against, half did not pursue the matter further because they did not feel as though there was any recourse, or that their pursuit of the potential violations would result in a desirable outcome. While not necessarily a statistically sizable enough sample to constitute a trend or pattern, this is something the Town would like to be able to better address in the future.

OTHER CONCERNS

At this time, there are no known additional concerns beyond what have already been identified

as impediments to fair housing choice.

IV. Identification of Impediments to Fair Housing Choice

PUBLIC SECTOR

Zoning and Site Selection:

The Town's Zoning regulations for residential areas range from high to rural density. In addition, the Town has created special-zones (overlay) for the development of affordable housing, housing for the elderly and physically disabled as well as individual and family housing. These special zones were formed to address any need for additional housing choices. Given the range of residential zoning available in Greenwich, the only identifiable impediment seems to be the high cost of housing in Town.

Municipal and Other Services: No impediments identified

The Town ensures that all of the municipal services are available to all parts of the Town to the extent feasible. In most cases, provisions for set-aside affordable housing require location that is close to public transportation, Town water and Town sewer to avoid additional housing-related expenditures.

Housing-Transportation Linkage:

The Town encourages the development of affordable housing units in close proximity to public transportation. Under the current Zoning regulations where incentives (bonus density) are granted for housing developments with set-aside affordable units, housing developments must be located where they have easy access to transportation. In addition, the Town's 2009 Plan of Conservation has recommended an evaluation of transit-oriented developments.

Property Tax Policies

Publicly assisted and subsidized housing receive support for their property tax payments. Under the State PILOT program, the Town receives payment in lieu of taxes for certain Public Housing developments. Other non-profit housing providers are tax-exempt and are therefore not charged property taxes where the housing units are located. In addition, individual housing units considered as set-aside affordable units can appeal their assessments to reflect the deed-restrictions on property value appreciation.

Building Codes (Accessibility): No impediments identified

The Town requires that all housing developers and builders comply with the Americans with Disabilities Act and State Building Codes for accessible housing. In addition, the Town also created the First Selectman's Advisory Committee for People with Disabilities in Greenwich. This Committee has been tasked with advising Town officials on matters pertaining to the rights and needs of people with disabilities.

PRIVATE SECTOR

Cost: The high cost of housing in Greenwich has always been an impediment to the availability of housing units. Builders and developers find it extremely difficult to develop affordable housing units for low-income individuals and families in the community. The current State Statute (CGS 8-30g) that encourages the development of set-aside affordable housing units does not work successfully in Greenwich due to the fact that income limits are restricted at the State Median Income level as opposed to the Area Median Income level.

REVIEW OF PLAN OF CONSERVATION AND DEVELOPMENT (POCD)

The Town of Greenwich updated its Plan of Conservation and Development in November of 2019. The 2009 POCD noted the desire for more affordable and moderate-income/work-force housing units in Town. To achieve this outcome, the Building Zone Regulations were amended to promote the inclusion of below-market rate housing units to be made affordable to those employed by the Town, not-for-profit agencies and non-governmental agencies. The 2109 POCD anticipates that the top two anticipated housing needs for the near future are 1) additional affordable housing, and 2) housing for an aging population, with the expectation that both of these needs will generate an even stronger market for multi-family residential development.

Among the housing plans in the 2019 POCD are:

1. **OBJECTIVE 2.1** Create more affordable housing as currently defined under Section 8-30g of the Connecticut General Statutes.
 - a. Update the Building Zone Regulations to further promote affordable housing through inclusionary zoning measures, pursuant to Section 8-2i of the Connecticut General Statutes, such as:
 - i. the setting aside of a reasonable number of housing units for long-term retention as affordable housing through deed restrictions or other means;
 - ii. the use of density bonuses; or
 - iii. payments to a housing trust fund to allow funds gathered from state and federal grants, donations, and other sources to facilitate construction of affordable housing.
 - b. The Housing Authority of the Town of Greenwich should use property they own to develop more affordable and senior housing. Secondly, inventory Town-owned land that could be offered to the Housing Authority through a long-term lease, particularly if this can be accomplished through adaptive re-use.
 - c. Update the Townhouse, Neighborhood, and Residential-Planning Housing Design-Small unit (R-PHD-SU) Zone requirements in the Building Zone Regulations to increase

subsidized housing that can be counted towards the Town's affordable housing inventory as defined by the State.

d. Update the elderly and affordable accessory housing requirements in the Building Zone Regulations to further promote this "hidden housing."

e. Utilize the property tax revaluation process to identify illegal apartments and encourage conversion of these units to legal, deed-restricted, affordable housing units that count towards the Town's affordable housing inventory as defined by the State.

f. Encourage subsidized housing in areas that are served by transit.

2. **Objective 2.2** Work with other Fairfield County Towns, the regional council of governments, the Connecticut Chapter of the American Planning Association, and others to consider amendments to the statute.

a. Lobby state legislators to modify Section 8-30g of the Connecticut General Statutes to use the area median income of the Metropolitan Statistical Area (MSA) of Stamford-Norwalk, as opposed to the state median income.

b. Lobby state legislators to use Naturally Occurring Affordable Housing (NOAH) in the affordable housing tabulation

3. **Objective 2.3** Facilitate housing options that encourage seniors to stay in Greenwich ("aging-in-place") and are designed for enjoyment of all.

a. Promote age-friendly housing options in or near walkable, pedestrian-friendly areas with one-floor living, lifestyle amenities, elevators, limited maintenance, and proximity to restaurants and other retail.

b. Develop regulations for assisted living facilities and comprehensive care communities.

c. Remove and prevent barriers to people with disabilities in existing developments.

d. Track the projected growth of the Town's senior population against development opportunities for age-restricted housing and adjust Building Zone Regulations as necessary.

4. **Objective 2.4** Support housing that is in keeping with the existing built environment, contributes to Town character, and is a more predictable product for both the neighborhood and developer.

a. Review incentives offered to build moderate income housing incentives to ensure they are predictable and the greater the incentive, the greater the number of units offered.

b. Encourage adaptive re-use of existing structures for multi-family development.

POCD Housing Implementation Matrix

#	Action Item	Lead Agency	Type	Priority
Objective 2.1: Create more affordable housing as currently defined under CGS 8-30g.				
a.	Update the Building Zone Regulations to further promote affordable housing through inclusionary zoning measures, pursuant to Section 8-2i of the Connecticut General Statutes, such as: i. the setting aside of a reasonable number of housing units for long-term retention as affordable housing through deed restrictions or other means; ii. the use of density bonuses; or iii. payments to a housing trust fund to allow funds gathered from state and federal grants, donations, and other sources to facilitate construction of affordable housing.	P&Z	A	1
b.	The Housing Authority of the Town of Greenwich should use property they own to develop more affordable and senior housing. Secondly, inventory Town-owned land that could be offered to the Housing Authority through a long-term lease, particularly if this can be accomplished through adaptive re-use.	HATG/BOS	A	1
c.	Update the Townhouse, Neighborhood, and Residential-Planning Housing Design-Small unit (R-PHD-SU) Zone requirements in the Building Zone Regulations to increase subsidized housing that can be counted towards the Town’s affordable housing inventory as defined by the State.	P&Z	A	3
d.	Update the elderly and affordable accessory housing requirements in the Building Zone Regulations to further promote this “hidden housing.”	P&Z	A	1
e.	Utilize the property tax revaluation process to identify illegal apartments and encourage conversion of these units to legal, deed-restricted, affordable housing units that count towards the Town’s affordable housing inventory as defined by the State.	P&Z	A	1
f.	Encourage subsidized housing in areas that are served by transit.	P&Z	V	
Objective 2.2: Work with other Fairfield County Towns, the regional council of governments, the Connecticut Chapter of the American Planning Association, and others to consider amendments to the statute.				
a.	Lobby state legislators to modify Section 8-30g of the Connecticut General Statutes to use the area	BOS	A	2

	median income of the Metropolitan Statistical Area (MSA) of Stamford-Norwalk, as opposed to the state median income.			
b.	Lobby state legislators to use Naturally Occurring Affordable Housing (NOAH) in the affordable housing tabulation	BOS	A	2
Objective 2.3: Facilitate housing options that encourage seniors to stay in Greenwich (“aging-in-place”) and are designed for enjoyment of all.				
a.	Promote age-friendly housing options in or near walkable, pedestrian-friendly areas with one-floor living, lifestyle amenities, elevators, limited maintenance, and proximity to restaurants and other retail.	P&Z	V	
b.	Develop regulations for assisted living facilities and comprehensive care communities.	P&Z	A	1
c.	Remove and prevent barriers to people with disabilities in existing developments.	P&Z	V	
d.	Track the projected growth of the Town’s senior population against development opportunities for age-restricted housing and adjust Building Zone Regulations as necessary.	P&Z	V	
Objective 2.4: Support housing that is in keeping with the existing built environment, contributes to Town character, and is a more predictable product for both the neighborhood and developer.				
a.	Review incentives offered to build moderate income housing incentives to ensure they are predictable and the greater the incentive, the greater the number of units offered.	P&Z	A	1
b.	Encourage adaptive re-use of existing structures for multi-family development.	P&Z	V	

V. Assessment of Current Public/Private Fair Housing Programs

The Town's CDBG Program requires all subrecipients of housing rehabilitation funds to comply with applicable HUD rules, regulations as well as the laws under the Fair Housing Act, the American with Disabilities Act, Equal Employment Opportunities and all other applicable Acts. The Town recognizes the need to provide financial support to housing rehabilitation projects, particularly affordable units to retain the current stock available. To ensure that such housing units remain decent and safe, housing rehabilitation projects will remain a priority when allocating CDBG funds.

The Town also created the First Selectman's Advisory Committee for People with Disabilities in Greenwich. This Committee will ensure that Town officials and employees as well as businesses and organizations are informed and educated concerning the rights and needs of people with disabilities.

VI. Conclusion and Recommendations

This AI was conducted without preconceived opinions regarding unlawful impediments to fair housing choice, as prohibited under the Fair Housing Law. There were several data sources and methods of public engagement utilized to ensure a thorough and complete identification of impediments to fair housing choice. The very high cost of housing and housing related expenditures in Greenwich has always been an impediment to housing availability and choice. However, this analysis has identified additional impediments and recommended actions to address such impediments.

Promoting awareness and educating the community through the dissemination of fair housing information will address the first impediment – limited and/or lack of knowledge regarding fair housing laws. The inadequate supply of affordable housing can be related to restricted housing choices. Therefore, the Town should continue to promote and encourage the development of decent and safe housing units to increase the current stock of affordable housing, which will provide additional choices. Finally, the Town should determine which department or division should be responsible for fair housing related issues. This will provide assurance that any fair housing related issues are identified, reported and addressed.

Conclusion (Impediments and Recommended Actions)

The review and analysis conducted indicated that any fair housing impediments (past and current) might not have been directly due to discrimination (as per HUD definition). Rather, any fair housing impediments might have been caused by the following: lack of and/or limited public awareness and knowledge; inadequate supply of affordable housing availability/options; and lack of support staff or contact person to assist with fair housing complaints and enforcement issues.

Goal	Fair Housing Issue	Strategies	Metrics, Milestones and Timeline for Achievement	Responsible Parties
<p>Increase community awareness of fair housing laws and means of recourse if residents encounter housing discrimination.</p>	<p>Disparities in access to opportunity</p>	<ol style="list-style-type: none"> 1. Utilize the Town’s website to educate and raise awareness of applicable fair housing laws and regulations. 2. Promote and distribute fair housing information through all branches of the Town library. 3. Provide fair housing literature for dissemination to builders and developers through the Department of Public Works and Planning and Zoning Office. 	<p>Strategy 1:</p>	<p>Community Development Office, in coordination with Public Works and Planning and Zoning.</p>

Goal	Fair Housing Issue	Strategies	Metrics, Milestones and Timeline for Achievement	Responsible Parties
<p>Increase the supply of affordable housing in Town to provide greater access to housing for low- and moderate-income households.</p>	<p>Disparities in access to opportunity</p>	<ol style="list-style-type: none"> 1. Support non-profit housing providers and developers in retaining the current stock of affordable housing available in Town by allocating available Town funds for rehabilitation work. 2. Review and update as necessary the current zoning policies that specifically provide incentives to encourage developers and builders to include affordable housing. 3. Follow-up on an annual basis with the Planning and Zoning Office regarding the status of the recommendation to consider zoning regulations that could require a percentage of housing units to be affordable units for any new multi-family housing developments. 	<p>Strategy 1:</p>	<p>Town of Greenwich, in coordination with developers and property owners and managers.</p>

Goal	Fair Housing Issue	Strategies	Metrics, Milestones and Timeline for Achievement	Responsible Parties
<p>Establish a fair housing point of contact within Town Hall to manage, coordinate and support fair housing efforts and complaints received.</p>	<p>Disparities in access to opportunity</p>	<p>1. Designate a representative within Town government to aggregate and respond to fair housing complaints; connect residents to the proper services related to fair housing; to promote awareness of fair housing laws and means of recourse; and to track progress made with respect to the AI.</p>	<p>Strategy 1:</p>	<p>Community Development Office.</p>