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I. INTRODUCTION

What is the Analysis of Impediments (AI) to Fair 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 as appropriate. The analysis involves:

- Comprehensive reviews of the Town's laws, regulations, and administrative policies, procedures, and practices;
- Assessment of how these laws, etc. affects 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 of January 1, 2010 through December 31, 2014, 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:

- Analyze and eliminate housing discrimination in the Town;
- 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.

Who conducted the AI?
This AI was conducted to update the previously submitted 2005 AI and to comply with the regulations and guidelines set forth by HUD in administering the CDBG program. This analysis was concluded and produced by the Community Development Office of the Town of Greenwich.

Participants
The participants in this AI include the Greenwich Association of Realtors (local realtors), Fair Housing Association of Connecticut, CT Department of Banking Commission, Commission on Human Rights and Opportunities, Norwalk CT Housing Court (local housing court), CDAC (Community Development Advisory Committee) members and Town residents.
Methodology
In order to produce a comprehensive AI, the Town of Greenwich has dedicated the responsibility to the Community Development Office. This office has access to and maintains records of all information related to housing choices in Town including current and potential fair housing issues as reported by the local realtors, area fair housing commission, State banking commission, CHRO and the area housing court. The CD Office analyzed all existing housing reports and studies including documented (filed) fair housing complaints.

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 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 2000 Data,
- U.S. HUD Data
- CHAS (Comprehensive Housing Affordability Strategy) Data,
- 2006-2008 Town of Greenwich CAPER,
- 2009 Greenwich POCD (Plan of Conservation and Development),
- 2007-2008 Annual Report of the Town of Greenwich,
- 2006 Assessment of Human Service Needs: Statistical Portrait of the Community by the United Way of Greenwich,
- 2009 Greenwich Town Profile by CERC – SWRPA,
- 2009 Southwestern Region Housing Report by SWRPA,
- 2008 FFIEC (Federal Financial Institutions Examination Council) Census Reports,
- 2008 HMDA (Home Mortgage Disclosure Act) Data, and
- Annual status reports from Greenwich Association of Realtors, FH Association of CT, CT Department of Banking Commission and CHRO.

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.

Impediment #1: Housing consumers as well as housing providers are not fully aware of and knowledgeable of the fair housing laws, discriminatory practices, enforcement agencies and the proper procedures involved with any fair housing issues.

Recommended Actions: The Town should take all appropriate actions in order to promote community awareness and educate the public on the fair housing laws and regulations. Some of the possible steps that can be undertaken to address this impediment are as follows:
- Utilize the Town’s website to raise awareness and educate the public by posting fair housing information (update as necessary).
- Distribute fair housing information to all Town public libraries (update as necessary).
- Provide fair housing information to the Town’s Building Department to be disseminated to housing developers upon application of building permits.
- Provide fair housing information to the Town’s Planning and Zoning Department to be given to housing developers upon application for a zoning permit.
- Request for a staff from the Hartford Fair Housing Office to come in and discuss fair housing laws, regulations and issues. Invite housing providers, realtors, bankers and the public to attend.

Impediment #2: The inadequate supply of affordable housing restricts choices to the limited housing options available to low-income households. Such restrictions on housing choices are strictly based on availability and the economics of the market place. This particular impediment is clearly an economic impediment due to the very high cost of housing in Town.

Recommended Actions: The Town should continue its commitment in removing or reducing unnecessary barriers to affordable housing (to the extent feasible). Some of the possible steps that can be undertaken to address this impediment are as follows:

- 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.
- Review and update as necessary the current zoning policies that specifically provide incentives to encourage developers and builders to include “set-aside” affordable housing.
- Follow-up on an annual basis with the POCD Implementation Committee regarding the status of the recommendation to consider zoning regulations that could require a percentage of housing units to be “set-aside” affordable units for any new multi-family housing developments.
- Follow-up on an annual basis with the POCD Implementation Committee regarding the status of the Housing Committee recommended to be created. The Housing Committee will be in charge of evaluating opportunities for housing development on Town-owned land along the Downtown area and Post Road for public transportation accessibility.
- Follow-up on an annual basis with the POCD Implementation Committee regarding the status of the Housing Taskforce also recommended to be created. The Housing Taskforce will be in charge of reviewing the current types of housing and present strategies/options for affordable housing development.

Impediment #3: The Town does not have a specific department assigned to provide assistance and support with regards to any fair housing issues. Thus, there is lack of support staff or contact person to assist with fair housing information, complaints, enforcement and procedure.

Recommended Action: The Town should review and assess all of the departments and divisions within its authority in order to properly determine which department or division should be responsible for fair housing related issues.
Town Profile

As part of the AI, it is important to also provide an overall view of the Greenwich community. The Town of Greenwich, located in the southwestern Fairfield County, lies on the southwest corner of the state, is bounded on the west and north by Westchester County (NY), on the east by the city of Stamford (CT) and on the south by Long Island Sound. Greenwich is 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 61,101 people (as per the 2000 Census) with a land area of about 48 square miles, 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 (1-95), Boston Post Road (U.S. Highway #1), and the Merritt Parkway. Although Greenwich has no airports, there are 3 airports within a few miles of the town (i.e. Westchester County, LaGuardia, and Kennedy Airports). Greenwich's proximity to a major metropolitan city, and access to transportation make it an ideal commuter community.

Demographic Data

The 2000 Census reported the Town population to be at 61,101. According to the 2009 CERC Town profile, the total population count has increased to approximately 61,171 in 2008. The median age in 2000 was 40.2, which increased to 43 in 2008. The following table shows the population changes by gender:

<table>
<thead>
<tr>
<th>Population By Gender</th>
<th>2000</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greenwich</td>
<td>61,101</td>
<td>61,171</td>
</tr>
<tr>
<td>Males</td>
<td>28,967</td>
<td>29,423</td>
</tr>
<tr>
<td>Females</td>
<td>32,134</td>
<td>31,748</td>
</tr>
<tr>
<td>Total</td>
<td>61,101</td>
<td>61,171</td>
</tr>
</tbody>
</table>


The following table shows the population changes by race and ethnicity:

<table>
<thead>
<tr>
<th>Population by Race &amp; Ethnicity</th>
<th>2000</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>55,001</td>
<td>53,315</td>
</tr>
<tr>
<td>Black or African American</td>
<td>1,017</td>
<td>1,449</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>52</td>
<td>30</td>
</tr>
<tr>
<td>Asian &amp; Other Pacific Islander</td>
<td>3,181</td>
<td>4,166</td>
</tr>
<tr>
<td>Some Other Race</td>
<td>1,850</td>
<td>2,211</td>
</tr>
<tr>
<td>Hispanic or Latino (of any race)</td>
<td>3,846</td>
<td>4,999</td>
</tr>
</tbody>
</table>

In terms of age distribution, the changes corresponding to population changes are as follows:

<table>
<thead>
<tr>
<th>Age Group</th>
<th>2000</th>
<th>2008</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-17 years old</td>
<td>9.5%</td>
<td>24.1%</td>
</tr>
<tr>
<td>18-64 years old</td>
<td>74.6%</td>
<td>60.2%</td>
</tr>
<tr>
<td>65+</td>
<td>15.9%</td>
<td>15.7%</td>
</tr>
</tbody>
</table>


Income Data
Greenwich is included in the Stamford-Norwalk Primary Metropolitan Statistical Area in terms of median income calculation (produced by HUD annually). For year 2009, the median family income for the Stamford-Norwalk area was set at $122,300 (for a family of four). This is a lot higher when compared to the State median family income, which was set at $85,700.

Employment Data
As of January 2009, the CT Department of Labor reported the Town’s labor force at 30,201 individuals with 28,561 employed and 1,640 unemployed. This reflects an unemployment rate of 5.4%. The unemployment rate back in April of 2005 was 3.1% and back in April 2000 was 1.0%.

Housing Profile
According to the 2000 U.S. Census, there were a total of 24,511 housing units in Greenwich at the time. The breakdown for the housing units is as follows:

<table>
<thead>
<tr>
<th>Housing Occupancy and Housing Tenure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Housing Units</td>
</tr>
<tr>
<td>Occupied Units</td>
</tr>
<tr>
<td>Vacant Units</td>
</tr>
<tr>
<td>Owner Occupied Units</td>
</tr>
<tr>
<td>Renter Occupied Units</td>
</tr>
<tr>
<td>Homeowner Vacancy Rate</td>
</tr>
<tr>
<td>Renter Vacancy Rate</td>
</tr>
<tr>
<td>Average HH size - Owner-occupied units</td>
</tr>
<tr>
<td>Average HH size Renter occupied units</td>
</tr>
</tbody>
</table>

Source: U.S. Bureau of the Census 2000

According to the 2009 CERC Town Profile, the Residential Data as in 2007 was as follows:

<table>
<thead>
<tr>
<th>Housing</th>
<th>Greenwich</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Units</td>
<td>24896</td>
</tr>
<tr>
<td>% Single Unit</td>
<td>69.5%</td>
</tr>
<tr>
<td>New Permits</td>
<td>191</td>
</tr>
<tr>
<td>As % of Existing Units</td>
<td>0.77%</td>
</tr>
<tr>
<td>Demolitions</td>
<td>177</td>
</tr>
<tr>
<td>Residential Sales</td>
<td>647</td>
</tr>
<tr>
<td>Median Price</td>
<td>2000000</td>
</tr>
<tr>
<td>% Pre-1950 Housing</td>
<td>42.4%</td>
</tr>
<tr>
<td>Subsidized Housing Units</td>
<td>1246</td>
</tr>
</tbody>
</table>

Source: CERC Greenwich Profile 2009
According to 2008 CAPER, the median sales price for residential homes in Greenwich in 2008 was $1,950,000. For the same period, the average sales price for residential homes was $2,747,309. For the same period (2008) the median sales price for residential condominiums was $740,000 and the averages sales price was $929,239.

Effective October 1st 2008, HUD set the the fair market rents (FMR) for Greenwich as follows:
- Studio apartment (0 BD) = $1,119
- 1 BD Unit = $1,362
- 2 BD Unit = $1,703
- 3 BD Unit = $2,219
- 4 BD Unit = $2,681

According to the Housing Authority, they own or manage about 1,204 housing units. The housing units accommodate the elderly/senior residents, families and individuals with disabilities. In 2009, the Housing Authority administered a total of 343 Section 8 Housing Vouchers (subsidized units from the private sector). There are also additional publicly assisted housing units administered by other non-profit agencies/organizations.

Affordable and accessible transportation continues to be a problem for low-income individuals and families, especially to those who do not live and/or work along the routes of public transportation (primarily running along the Post Road and/or the Metro North Railroad).

Other Relevant Data
The limited options and restricting choices for decent, safe and affordable housing continues to be the major housing problem for low-income households. According to the 2000 Census and CHAS Data, there were 23,230 total households in Greenwich. The breakdown of all households in terms of housing problems is as follows:

<table>
<thead>
<tr>
<th>HH Income</th>
<th>Renters</th>
<th>Owners</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;=30% MFI</td>
<td>1,211</td>
<td>1,039</td>
</tr>
<tr>
<td>% w/any housing problem</td>
<td>62.6%</td>
<td>78.7%</td>
</tr>
<tr>
<td>&gt;30% to &lt;=50% MFI</td>
<td>894</td>
<td>886</td>
</tr>
<tr>
<td>% w/any housing problem</td>
<td>62.6%</td>
<td>68.4%</td>
</tr>
<tr>
<td>&gt;50% to &lt;=80% MFI</td>
<td>420</td>
<td>465</td>
</tr>
<tr>
<td>% w/any housing problem</td>
<td>70.5%</td>
<td>60.9%</td>
</tr>
<tr>
<td>&gt;80% MFI</td>
<td>4,488</td>
<td>13,419</td>
</tr>
<tr>
<td>% w/any housing problem</td>
<td>16.7%</td>
<td>21.5%</td>
</tr>
<tr>
<td>Total Households</td>
<td>7,013</td>
<td>15,809</td>
</tr>
<tr>
<td>% w/any housing problem</td>
<td>33.7%</td>
<td>29.0%</td>
</tr>
</tbody>
</table>

Source: CHAS Data Report
Evaluation of the Town’s Current Fair Housing Legal Status

Fair Housing Charges by HUD Secretary
As of the date of this AI, there has not been any fair housing complaints or charges issued by the Secretary of HUD. In addition, there has been no recorded prior complaint where the Secretary has issued a charge or made a finding of discrimination. As of November 2009, there are no known fair housing complaints filed with the Secretary of Housing and Urban Development.

Fair Housing Discrimination Complaints and Suits
Since the last AI (2005), there have been five fair housing complaints filed where the alleged discrimination occurred in Greenwich. The first two housing complaints were filed with CHRO during calendar year 2006. As of the end of 2006, both cases were still pending. The third complaint was filed with the Fair Housing Association of CT on March 2007, where a listing agent stated that the property owner refused to rent to a Section-8 housing voucher holder. This case was settled on June 2007 with a predetermination settlement. The fourth complaint was filed with CHRO on July 2008, where the prospective tenant alleged that they were denied the opportunity to rent due to their source of income (Section-8 housing voucher) and their familial status. This case was settled on November 2008 with a satisfactory resolution. The fifth complaint was filed with CHRO on November 2008, where the prospective tenant alleged that they were denied the opportunity to rent due to their source of income (Section-8 housing voucher) and their familial status. This case was pending (under investigation) as of the end of 2008.

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.

Other Concerns
At this time, there are no known additional concerns beyond what have already been identified as impediments to fair housing choice.
Identification of Impediments to Fair Housing Choice

A. 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 must comply with the Americans with Disabilities Act and State Building Codes for accessible housing. In addition, the Town also created the Advisory Committee for People with Disabilities in Greenwich. This Committee has been charged to advise Town Officials on matters pertaining to the rights and needs of people with disabilities.

B. 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.
Assessment of Current Public/Private Fair Housing Programs

The Town’s CDBG program requires all sub-recipients of housing rehabilitation funds to comply with all 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 especially affordable units to retain the current stock available. To ensure that such housing units remain decent and safe, housing rehabilitation projects have always been a priority when allocating CDBG funds. The Town has been providing more than half of its CDBG grant to support housing rehabilitation and improvement projects.

The Town also created the 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.

The Town’s Chapter of the American Red Cross administers a Language Bank program. This program is designed to address any communication barriers. Under the Language Bank program, skilled volunteers who are fluent in a various languages assist individuals of Limited English Proficient (LEP) and non-English speaking by providing interpretation (oral) and translation (written). The services provided are free of charge.
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 researched and analyzed to ensure a thorough and complete identification of all 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 result 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 appointed as a liaison between the Greenwich residents and the Fair Housing Office in Hartford. This will provide assurance that any fair housing related issues are identified, reported and addressed.