

# Fair Housing Plan

December, 1996

Prepared for  
The City of Middletown

by:  
Municipal Development Office  
Consumer Protection Office  
Commission on Human Relations

## **Table of Contents**

---

<b>Introduction</b> .....	1
<b>Community Background Data</b> .....	4
Demographic Data - Population .....	4
<b>Map of Census Tracts</b> .....	5
<b>Map Showing Black Settlement Patterns</b> .....	8
<b>Map Showing Hispanic Settlement Patterns</b> .....	9
Demographic Data - Families and Households .....	11
Housing Profile .....	17
Employment .....	22
Income .....	25
<b>Map of Low Income Concentrations</b> .....	27
<b>Transportation</b> .....	28
<b>Map of Bus Routes</b> .....	30
<b>Assisted Housing In Middletown</b> .....	31
<b>Agencies, Programs and Services That Assist In Fair Housing</b> .....	38
City of Middletown - Commission on Human Relations .....	38
City of Middletown - Committee Concerning People With Disabilities .....	39
Connecticut Commission on Human Rights and Opportunities (CHRO) .....	40
State of Connecticut Superior Court - Middletown Housing Court .....	41
Connecticut Legal Services .....	42
Statewide Legal Services .....	43
Connecticut Fair Housing Center .....	43
Community Reinvestment Act (CRA) .....	44

---

<b>Administrative Policies and Programs</b> .....	45
Zoning .....	45
Housing Development Zone .....	46
Residential Rehabilitation Programs .....	47
Down Payment Assistance Programs .....	48
<b>Identification of Impediments to Fair Housing Choice</b> .....	49
Rental and Section 8 Markets .....	49
Home Ownership Opportunities .....	51
The Mortgage Lenders Dilemma .....	53
Location, Location, Location .....	55
Transportation .....	55
<b>Potential Actions to Further Fair Housing</b> .....	57
<b>Effectivity</b> .....	59
<b>Appendix</b> .....	61
1. Ordinance No. 88-16 - Creation of City of Middletown Housing Partnership . . .	61
2. Ordinance Section 28-1 - Tax Abatement on Low and Moderate Income Housing	61
3. Ordinance Section 24-10 - Establishment of Commission on Human Relations .	61
4. Ordinance Section 14-20 - Fair Housing .....	61
5. Resolution - Committee Concerning People With Disabilities .....	61
6. Informational Brochure - CDBG Residential/Mixed Use Rehabilitation .....	61

# Introduction

The City of Middletown has prepared its analysis of impediments to Fair Housing in response to HUD's Consolidated Plan final approval of February 6, 1995 requiring recipients of Community Development Block Grant funds to certify that they will affirmatively further fair housing (24 CFR 91.225).

Certification that a community will affirmatively further fair housing requires it to:

- ▶ conduct an analysis to identify fair housing choice within its jurisdiction;
- ▶ carry out appropriate actions to overcome the effects of any impediments identified through that analysis; and,
- ▶ retain records which reflect the analysis and actions in this regard.

The analysis of impediments to fair housing consists of a comprehensive review of policies, practices and procedures which effect location, availability and accessibility of housing and an assessment of conditions, both public and private, which effect fair housing choice.

For purposes of preparing the analysis and the plan, it is important to understand some of the ideals associated with these issues. This understanding includes consideration of:

- ▶ the existence of and the elimination of discriminatory practices and behavior within the housing industry including rental and purchase practices, lending practices, steering and insurance red lining;
- ▶ the promotion of fair housing choice for all persons;
- ▶ the provision of opportunities for racially and ethnically inclusive patterns of housing occupancy;
- ▶ the promotion of housing that is physically accessible to and usable by all persons particularly persons with disabilities.

Put another way, fair housing means assuring that all persons have a free choice of housing location limited by only one's means and/or desires, but not limited by one's attributes which have been recognized by law as "protective classes". In Connecticut, the protective classes are race, color, creed, national origin, ancestry, sex, marital status, age, mental retardation, learning or mental or physical disability, source of income, familial status and sexual orientation. Under Federal law, the protective classes are race, color, religion, sex, familial status, national origin and handicapped condition.

In fulfilling HUD's requirement, the preparation of this document was undertaken by the Municipal Development Office with the assistance of the Consumer Protection Office. Review and oversight responsibilities were fulfilled by the Human Relations Commission. The Comprehensive Housing Affordability Strategy (CHAS) report prepared by the City in 1994, is the source of some data, primarily demographics and housing. Funding for the preparation of this report is from the FY 1995-1996 CDBG grant made to the City of Middletown for its role in administering the program.

The methodology used in preparing this report follows the recommended outline provided by the U.S. Department of Housing & Urban Development through its Equal Opportunities staff in the Connecticut State Office.

# Community Background Data

## Demographic Data - Population

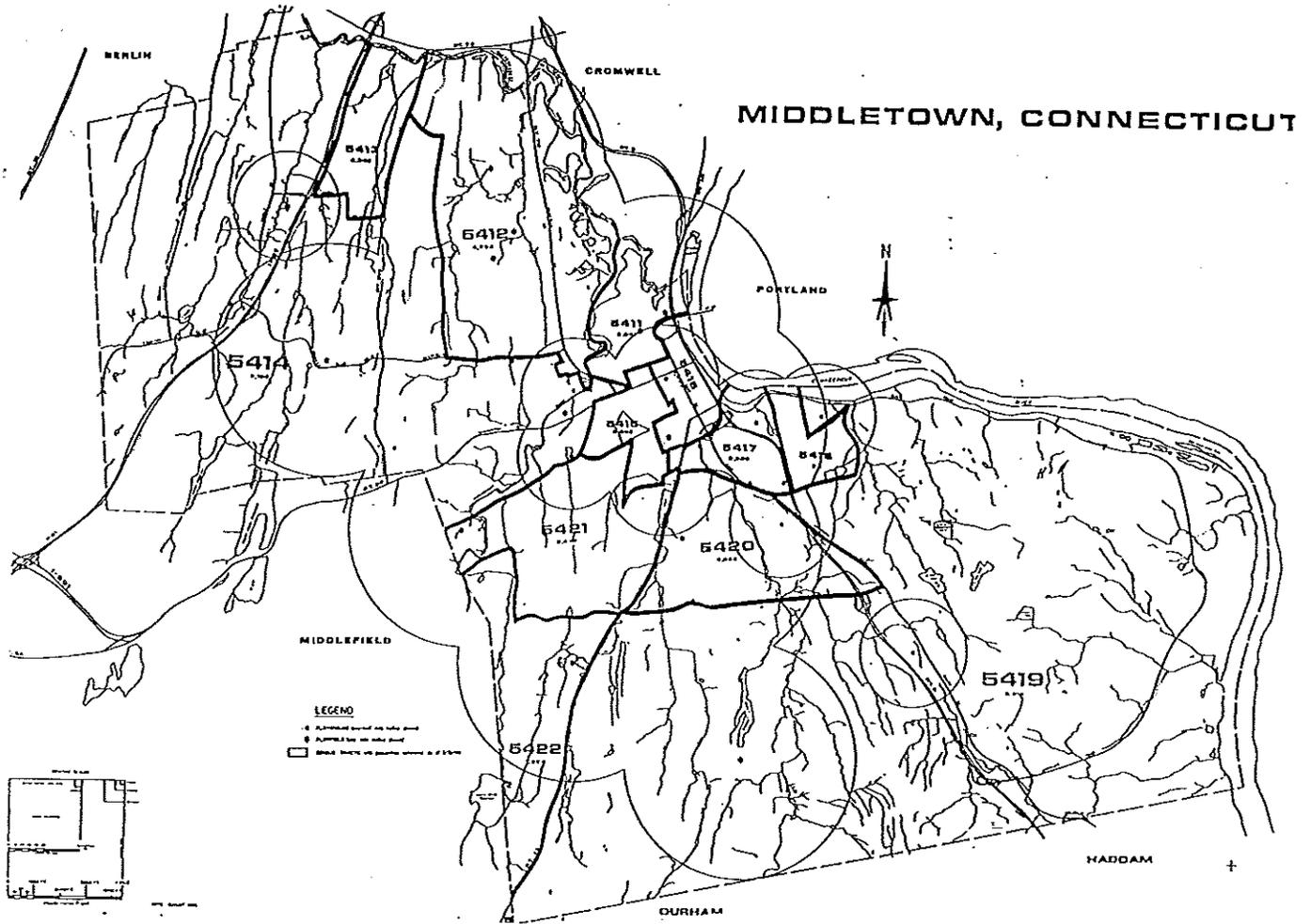
The City's 1990 population was 42,762, an increase of 3,722 since 1980. In 1980, the percentage of white, non-Hispanic population to the total population was 88.5%. That percentage decreased to 85.4% in 1990. Between the years 1980 and 1990, the City's Black population increased from 3,673 to 4,631 raising the percentage of Black residents from 10.8% to 11.1%. Hispanics increased from 1,005 or 2.9% of the total population to 1,413 or 3.3% of the City's population.

By far, the greatest population gains were made by Asian and Pacific Islanders. While the smallest minority group within the City's population, Asian and Pacific Islanders increased from 237 individuals to 810 individuals by 1990, a percentage increase of 245%.

Between 1980 and 1990, whites increased by 5.6%, while Blacks increased by 26.1% and Hispanics by 41%. According to the State of Connecticut CHAS: "The City of Middletown contains 78.7 percent of the region's minorities. 16.3 percent of the City of Middletown's population consists of minorities".

Based upon neighborhood statistics developed in the 1990 Census, Table "A" was prepared showing the percentage of minorities and low/mod income by Census Tract. For purposes of this report, the definition of

# MAP OF CENSUS TRACTS



"area of racial/ethnic minority concentration" is as follows: any neighborhood where the percentage of minority residents exceeds the overall City percentage. Therefore, based upon the figures which indicate that the overall City percentage of Blacks is 11.1% and the percentage of Hispanics is 3.3%, minority concentrations as shown in Table "A" are as follows: for Blacks, Census Tract 5416 (the Central Business District); 5417 (the South End); 5418 (Connecticut Valley Hospital); 5419 (Randolph Road South/Maromas); and, 5421 (Long Hill North).

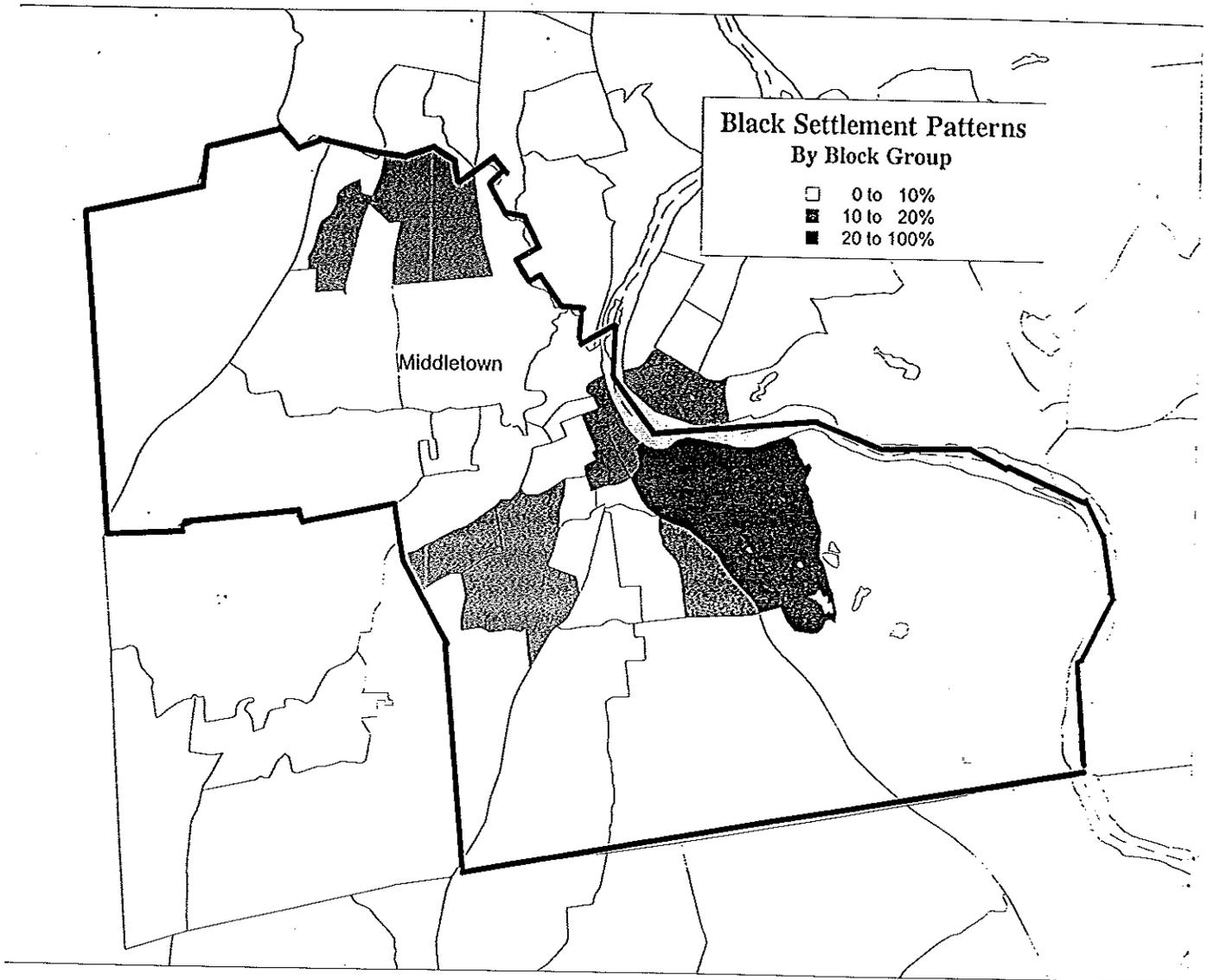
Likewise using the City of standard 3.3% for Hispanics, the following Census Tracts have higher concentrations: 5411 (North End); 5416 (the Central Business District); 5417 (South End); 5418 (Connecticut Valley Hospital); and, 5421 (Long Hill North). The data reveals that there are four Census Tracts with higher concentrations of both Blacks and Hispanics. However, Census Tract 5418 is Connecticut Valley Hospital and is, therefore, not representative of the City of Middletown. The figures from 1990 generally reflect the location of public housing projects as administered by the Middletown Housing Authority.

**TABLE "A"**  
**PERCENTAGE OF MINORITIES AND LOW/MOD INCOME BY CENSUS TRACT**

	<u>% BLACK</u>	<u>% HISPANIC</u>	<u>% LOW/MOD</u>
City Total	11.1	3.3	32.95
5411 (North End)	7.5	4.1	46.47
5412 (Newfield)	7.7	3.0	29.25
5413 (Westlake)	11.1	2.8	20.88
5414 (Westfield)	6.7	2.3	26.96
5415 (Wesleyan)	9.4	3.0	49.32
5416 (CBD)	16.8	8.8	73.90
5417 (South End)	27.9	5.6	47.10
5418 (CVH)	20.5	5.1	35.71
5419 (Randolph Road South/Maromas)	12.3	2.3	30.85
5420 (South Farms)	6.6	1.6	24.01
5421 (Long Hill North)	16.9	4.8	43.29
5422 (Long Hill South)	6.4	1.4	9.46

Source: 1990 Census

# MAP SHOWING BLACK SETTLEMENT PATTERNS



# MAP SHOWING HISPANIC SETTLEMENT PATTERNS

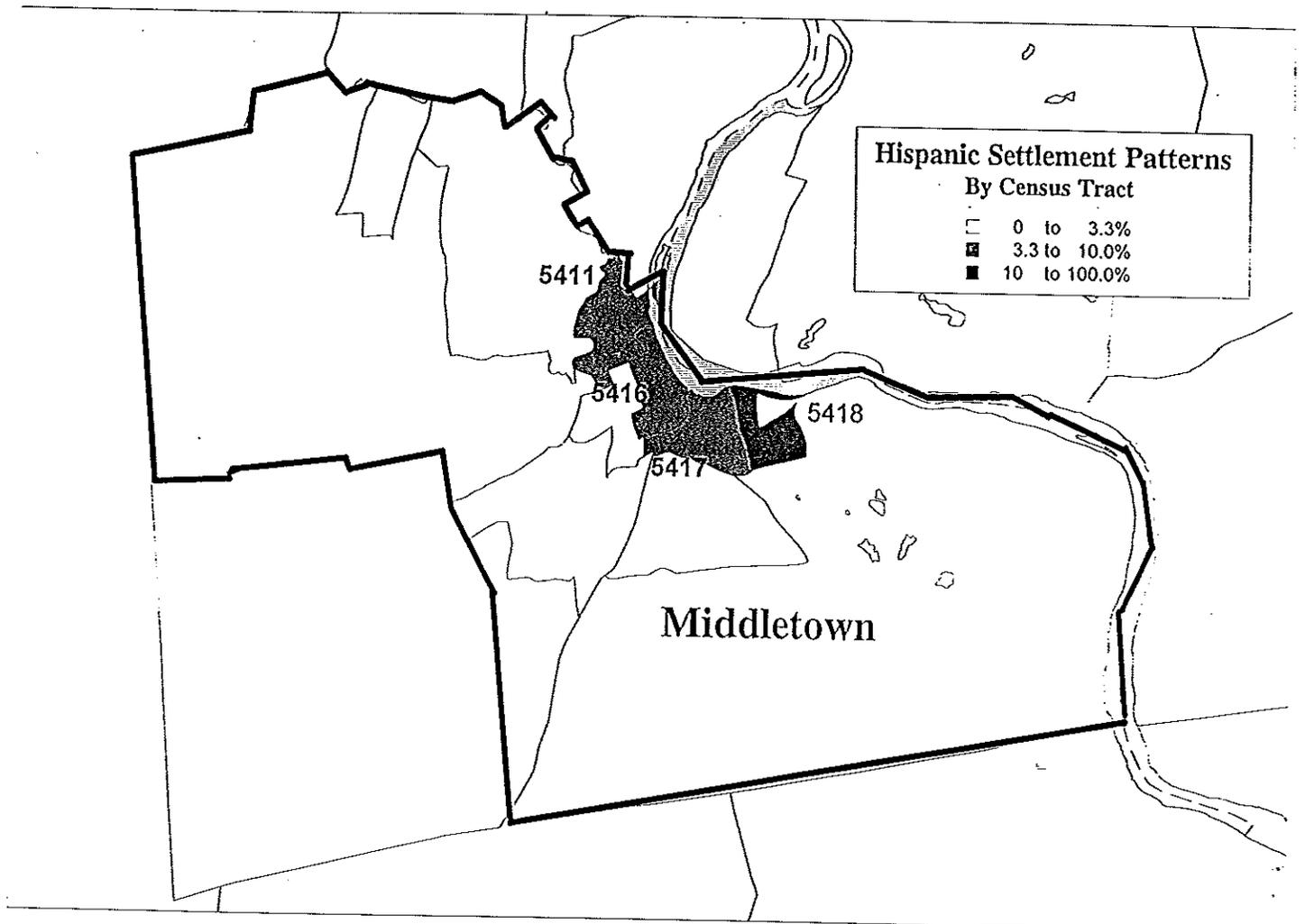


Table "A" identifies three Census Tracts where the percentage of Blacks, the percentage of Hispanics, and the percentage of low and moderate income families all demonstrate concern for racial/ethnic minority concentration or a low/moderate income concentrations. Those Census Tracts are 5416 (Central Business District), 5417 (South End), and 5421 (Long Hill North).

Because of its various institutions, Middletown maintains a significant number of persons residing in group quarters. The major facilities include: Wesleyan University; Connecticut Valley Hospital (CVH); and, Long Lane School.

Both CVH and Long Lane School are State institutions. The former for mental patients, while the latter is for troubled youth. Group quarter population grew from 2,958 in 1980 to 3,860 in 1990, representing an increase of 30%. During the 1980's, there was a significant growth in the number of group homes sponsored by State and/or local social service agencies.

According to sources at the Connecticut Valley Hospital, the patient population in 1993 was less than 300 persons. However, consideration from Fairfield Hills and Norwich has resulted, thus far, in a modest increase.

The Wesleyan University Office of Student Housing indicated there were 2,729 full-time students living in Middletown in 1994. Of that number, 2,434 students lived in University-owned housing, while 30 students lived in fraternities and 265 students lived in private accommodations surrounding the campus.

## **Demographic Data - Families and Households**

In November, 1991, a report was produced entitled "An Analysis of Key Demographic Developments in the Meriden, Middlesex Service Delivery Area and Connecticut: Findings from the 1990 Census". This report was prepared for the purpose of gaining a better understanding of the market and population conditions in the area served by the Job Training Partnership Act for the City of Meriden and Middlesex County which includes Middletown. Table "B" summarizes some of the findings and shows a comparison of 1980 and 1990 Census data with regard to the number and percent of family households in: the Midstate Regional Planning Area (8 northern towns of Middlesex County), the City of Middletown; and, the remaining seven (7) towns within the Midstate Region.

**TABLE "B"**  
**NUMBER AND PERCENT OF HOUSEHOLDS**

	<u>1980</u>	<u>1990</u>	<u># CHANGE</u> <u>1980-1990</u>
<b><u>MIDDLETOWN</u></b>			
Total # Households	14,130	16,821	19.0%
# Family Households	9,474	10,280	8.5%
% Family Households	67.1%	61.1%	(-) 6.0%
<b><u>MIDSTATE R.P.A.</u></b>			
Total # Households	30,710	36,795	19.8%
# Family Households	22,409	25,205	12.5%
% Family Households	73.0%	68.5%	(-) 4.5%
<b><u>MIDSTATE R.P.A./</u></b> <b><u>NON-MIDDLETOWN</u></b>			
Total # Households	16,580	19,974	20.5%
# Family Households	12,935	14,925	15.4%
% Family Households	78.0%	74.7%	(-) 4.5%

Source: An analysis of Key Demographic Developments in the Meriden-Middlesex Service Delivery Area and Connecticut: Findings from the 1990 Census; November, 1991. (Private Industry Council Report).

Between 1980 and 1990, the total number of households increased in Middletown by 19%, while the number of family households only increased by 8.5%. Between 1980 and 1990, the percentage of family households to total households decreased from 67.1% to 61.1%. In other words, the non-family households increased by over 40% for the ten (10) year period 1980 through 1990 while family households increased by 8.5%. By showing corresponding data for the entire Midstate Region and the seven suburban/rural communities within the Region, the City's accommodation of a greater variety of housing other than family households is very evident. Note in the seven suburban/rural Midstate communities, the percentage of family households to total households only decreased from 78% to 74.7% in the ten (10) year period.

To underscore the disproportionalness in home ownership between the various ethnic groups, Table "C" shows the home ownership rates for the City of Middletown in 1980 and 1990 and for the Midstate Region for 1990. Note that between 1980 and 1990, home ownership rates increased for every ethnic group; however, the greatest gains were scored by Hispanics. Still, when compared to the whole Region, the City of Middletown carries a greater responsibility for the renters, for not only minority groups, but for the non-minority groups as well.

**TABLE "C"**  
**HOME OWNERSHIP RATES**

	<u>Middletown</u>		<u>Midstate</u>
	<u>1980</u>	<u>1990</u>	<u>R.P.A.</u> <u>1990</u>
White/Non-Hispanic	51.9%	53.7%	69.0%
Black/Non-Hispanic	25.4%	28.6%	32.7%
Hispanic	22.0%	29.4%	43.5%
Other/Non-Hispanic	31.5%	35.5%	50.5%

**Source: Private Industry Council Report**

From the State of Connecticut CHAS, published April 1992, the following was noted: "According to the Department of Housing's 1989 Catalog of Publicly Assisted Rental Housing, Midstate region towns contain 3,238 publicly assisted rental units. This figure includes tenant based certificates including vouchers from the federal government and the State of Connecticut. This total broke down to 2,158 family units and 1,080 elderly units. Of this total, 2,776 units or 85.7 percent were located in Middletown .... it is clear that Middletown contains a disproportionate amount of subsidized housing than the remainder of the region. This total has to be distributed through the whole region to assure adequate housing

choice and opportunity for low income residents." Further, the Connecticut CHAS noted: "Middletown contains 67.8 percent of the region's renter occupied units.... Middletown holds 6,975 or 78.7 percent of the region's minority population. This group accounts for 16.3 percent of the town's total population.

Table "D", taken from a series of tables within the Private Industry Council study, shows a comparison between 1980 and 1990 of the total number of families broken down into married couples, male-headed/no spouse, and female-headed/no spouse. Most striking is the increase over the ten (10) year period of the number of female-headed families with no spouse present -an increase of 392 family units. Of note, from the 1990 data are the statistics showing that 46.8% of all Black families are female-headed with no spouse and 39.3% of all Hispanic families are female-headed with no spouse. In contrast, the male-headed family households with no spouse present record only two percentage points difference among the White, Black and Hispanic households.

**TABLE "D"**  
**DISTRIBUTION OF FAMILIES WITH ONE OR MORE RELATED CHILDREN**

	<u>1980</u>	<u>1990</u>	<u># Change</u> <u>1980-1990</u>
<b><u>Middletown - All Families</u></b>			
Total Number Families	9,474 (100.0%)	10,280 (100.0%)	806
Married Couples/Families	7,501 ( 79.2%)	7,813 ( 76.0%)	312
Male Headed Family/No Spouse	359 ( 3.8%)	461 ( 4.5%)	102
Female Headed Family/No Spouse	1,614 ( 17.0%)	2,006 ( 19.5%)	392
<b><u>White/Non-Hispanic</u></b>			
Total Number Families		8,959 (100.0%)	
Married Couples/Families		7,135 ( 79.6%)	
Male Headed Family/No Spouse		386 ( 4.3%)	
Female Headed Family/No Spouse		1,438 ( 16.1%)	
<b><u>Black</u></b>			
Total Number Families		1,054 (100.0%)	
Married Couples/Families		502 ( 47.6%)	
Male headed Family/No Spouse		59 ( 5.6%)	
Female Headed Family/No Spouse		493 ( 46.8%)	
<b><u>Hispanic</u></b>			
Total Number Families		272 (100.0%)	
Married Couples/Families		148 ( 54.4%)	
Male Headed Family/No Spouse		17 ( 6.3%)	
Female Headed Family/No Spouse		107 ( 39.3%)	

**Source: Private Industry Council Report**

## Housing Profile

Concerning the balance between owner occupied and renter occupied units in the City of Middletown, the State CHAS notes the following: "The 1990 Census reports a total of 40,087 housing units in the region, an increase of 21.6 percent since 1980. 36,795 (91.8 percent) of these units are occupied. There are 26,390 single-family units and 13,026 multi-family units. There are 24,582 (66.8 percent) owner-occupied units and 12,213 renter-occupied units. The City of Middletown contains 67.8 percent of the region's renter occupied units." Table "E" entitled "Owner/Renter by Race - 1980 and 1990" indicates that in 1980 49.1% of all units in the City of Middletown were owner-occupied. Conversely, 50.9% were renter occupied. This balance was reversed by 1990 so that 50.7% were owner occupied and 49.3 renter-occupied. By racial group in 1990, 53.7% of units occupied by white non-Hispanics were owner-occupied, while only 28.6% of all Black/non-Hispanic occupied units were owner occupied and 29.4% of Hispanic units were owner-occupied. Other races owned 35.5% of their occupied units. It should be noted that all of these percentages increased in the ten year period 1980 to 1990.

**TABLE "E"**  
**OWNER/RENTER BY RACE - 1980 AND 1990**

	<u>1980</u>		<u>1990</u>	
<u>Middletown</u>				
Total Number Occupied Units	14,130.		16,821.	
Owner Occupied	6,933.	(49.1%)	8,535.	(50.7%)
Renter Occupied	7,197.	(50.9%)	8,286.	(49.3%)
<u>White/Non-Hispanic</u>				
Total Number Occupied Units	12,633.		14,739.	
Owner Occupied	6,554.	(51.9%)	7,920.	(53.7%)
Renter Occupied	6,079.	(48.1%)	6,819.	46.3%)
<u>Black/Non-Hispanic</u>				
Total Number Occupied Units	1,102.		1,463.	
Owner Occupied	280.	(25.4%)	419.	(28.6%)
Renter Occupied	822.	(74.6%)	1,044.	(71.4%)
<u>Hispanic</u>				
Total Number Occupied Units	268.		385.	
Owner Occupied	59 .	(22.0%)	113.	(29.4%)
Renter Occupied	209.	(78.0%)	272.	(70.6%)
<u>Other Non-Hispanic</u>				
Total Number Occupied Units	127.		234.	
Owner Occupied	40 .	(31.5%)	83.	(35.5%)
Renter Occupied	87 .	(68.5%)	151.	(64.5%)

**Source:** 1980 and 1990 Census

Again, using information from the State CHAS concerning the value of housing: "The median value of an owner occupied unit spans from \$157,000 in Middletown to \$193,800 in Haddam. In determining housing affordability, it is necessary to compare costs with income. For the

purpose of this report, housing affordability will be defined as follows, affordable housing sales should be 2.5 times income; affordable rental costs should be 30 percent or less of gross income." Thus, if the City of Middletown shows a median family income of \$43,555, the maximum monthly shelter cost should be \$871.00 for a family earning 80% of the median income. For a family at 50% of the median income, the corresponding maximum monthly shelter cost is \$544.00.

Following is Table "F" entitled "Median Residential Real Estate Transactions - Middletown" for the period 1990 through 1995.

---

**TABLE "F"**  
**Median Residential Real Estate Transactions - Middletown**

---

	<u>Residential</u>	<u>Condo</u>	<u>All Sales</u>
1990	\$140,000	\$106,500	\$125,000
1991	\$133,000	\$ 92,000	\$120,900
1992	\$127,700	\$ 82,100	\$117,000
1993	\$120,000	\$ 79,900	\$110,000
1994	\$107,000	\$ 72,500	\$100,000
1995	\$115,000	\$67,500	\$100,000

---

**Source: Commercial Record**

---

The figures show that from a peak of high sales activity in the late 1980's, the price of housing steadily declined through 1994. In 1995, condo sales continued to slip while single family detached units jumped up 7.5%.

During the first six (6) months of 1996, the median sales price surged to \$135,000. This does not bode well for providing ownership opportunities for those desiring to break the cycle of assisted housing unless first-time homebuyers are willing to buy into the condo market. The good news is that they are more affordable. The bad news is that they continue to lose value.

Lead based paint presents a different set of problems, particularly for low and moderate income families. The estimated number of renter households with lead based paint is 2,724. The estimated number owner-occupied households with lead based paint is 1,203. Pre-1940 housing represents 24% of the entire City housing stock. 19% of the pre-1940 housing units are occupied by very low income renters.

Due to Middletown's age of housing units, the potential number of lead based paint units is high and will take significant time and resources to ameliorate.

**TABLE "G"**  
**Housing Inventory - 1990**

<u>Category</u>	<u>Total</u>	<u>Vacancy Rate</u>	<u>0-1 Bedroom</u>	<u>2 Bedrooms</u>	<u>3-More Bedrooms</u>
Total Year-Round Housing	18,102		4,127	6,247	7,728
<u>Total Occupied Units</u>	16,821		3,724	5,705	7,392
Renter	8,286		3,331	3,460	1,495
Owner	8,535		393	2,245	5,897
<u>Total Vacant Units</u>	1,281	8%	403	542	336
For Rent	708	3%	325	314	69
For Sale	246		0	147	99
Other	327		78	81	168

Source: U.S. Census

## Employment

Historically, Middletown was a center for manufacturing at a time when major employers were in and near the downtown area. Most companies were within walking distance of a major portion of their labor force. With the demise of those companies and their facilities, new employment opportunities were opened on the outskirts of the City, particularly in the Maromas area of Middletown where Pratt & Whitney Aircraft has located a major installation and along the I-91 corridor where an estimated 8,000 persons work, the largest of which is Aetna Life & Casualty.

In response to a need to bolster the employment and tax base of the areas in and near the downtown, the City began several years ago, to undertake several initiatives which have yielded positive results. In December 1994, the City was awarded Enterprise Zone status for a large portion of the Central Business District plus part of the North End Industrial Area. Concurrent with that designation, Middletown became a Targeted Investment Community which authorized development incentives for manufacturers moving into or expanding in all parts of the community. Of note in that effort was the attraction of BioSystems to South Main Street bringing over 100 employees to the community and Lyman Products on Smith Street (in the former Olin Ski facility) also bringing over 100 employees into Middletown.

The City of Middletown is in the implementation phase of the North End Industrial Area, a project of 44± acres north of the Arrigoni Bridge in Census Tract 5411. That project has been approved by the Connecticut Department of Economic and Community Development under the provisions of Chapter 588I and Chapter 132 of the Connecticut General Statutes to create new jobs and enhance the area tax base in a "brownfield" through acquisition, demolition, environmental remediation, infrastructure improvements and disposition for commercial and industrial entities. When the City applied to the State of Connecticut for project funds, a major goal was to provide job opportunities for those persons living in the downtown area. Working

together with the Regional Workforce Development Board, the City intends to provide the employee training necessary for new manufacturers to the area so as to encourage the hiring of those persons who demographically are low and moderate income and/or minorities.

According to the 1990 Census, 23,923 City residents were employed at that time. By far, the largest category of employment is manufacturing (18.6%). Other industries showing strong employment trends include: retail trade (13.6%); finance, insurance and real estate (12.6%); education (12.1%); and, health services (10.9%). These five major areas of activity account for over two-thirds of persons employed in 1990. The most recent unemployment rate (September, 1996) for Middletown is 5.5%.

Following is a list of Middletown's major employers as provided by the Connecticut Department of Economic and Community Development and augmented by local knowledge.

Table "H"  
Major Employers in Middletown

<u>Employers' Name</u>	<u>Number of Employees -</u>
Aetna Health Plans	1000 +
City of Middletown	1000 +
Connecticut Valley Hospital	1000 +
Middlesex Hospital	1000 +
Pratt & Whitney Aircraft	1000 +
Wesleyan University	1000 +
CT Department of Children & Families	400 - 500
Riverview Children's Hospital	300 - 400
Harbor Hill Health Center	200 - 300
Liberty Bank	200 - 300
Middlesex Community-Technical College	200 - 300
Stop & Shop	200 - 300
Adult Education	100 - 200
Advanced Belt Technologies	100 - 200
Bourdon Forge Company	100 - 200
Community Action for Greater Middlesex County, Inc.	100 - 200
Community Health Center, Inc.	100 - 200
Dattco, Inc.	100 - 200
Farmers & Mechanics Bank	100 - 200
High View Health Care Center	100 - 200
Madrigal Audio Labs, Inc.	100 - 200
Middlesex Convalescent Center	100 - 200
Middlesex Mutual Assurance Company	100 - 200
NAPA Auto Parts Distribution Center	100 - 200
Raymond Engineering, Inc.	100 - 200
Town & Country Auto Sales, Inc.	100 - 200
Turbo Power & Marine Systems	100 - 200
Wadsworth Glen Health Care Center	100 - 200
Yellow Freight System, Inc.	100 - 200
YMCA	

Source: Department of Economic and Community Development and Municipal Development Office

## **Income**

According to the 1990 Census, Middletown's median family income in 1989 was \$44,339. That means that half of the City's households had an income of lesser value and half had higher income.

From the State of Connecticut CHAS, the following information was developed concerning median income: "The Middletown PMSA has a median family income of \$47,300 according to HUD's Fiscal Year 1991 estimates. According to DOH estimated town incomes for 1991, Midstate communities have median incomes ranging from \$43,555 in Middletown to \$51,867 in Cromwell. 54 percent of the low and very low income households of the region are concentrated in the City of Middletown."

Each year, HUD provides estimates of median family income and threshold limits for low and very low income earners. As noted in the following table, Middletown's median income for a family of four (4) stands currently at \$55,600. For comparative purposes, the low income limits are shown for one person and four person households. These low income limits relate to a family's (or individual's) eligibility for assisted housing.

---

---

**TABLE "I"**

---

<u>Fiscal Year</u>	<u>Median Income Family of 4</u>	<u>Low Income Family of 4</u>	<u>Low Income Single Person</u>
1990	\$44,800	\$35,700	\$35,700
1993	\$52,700	\$39,700	\$39,700
1996	\$55,600	\$41,600	\$41,600

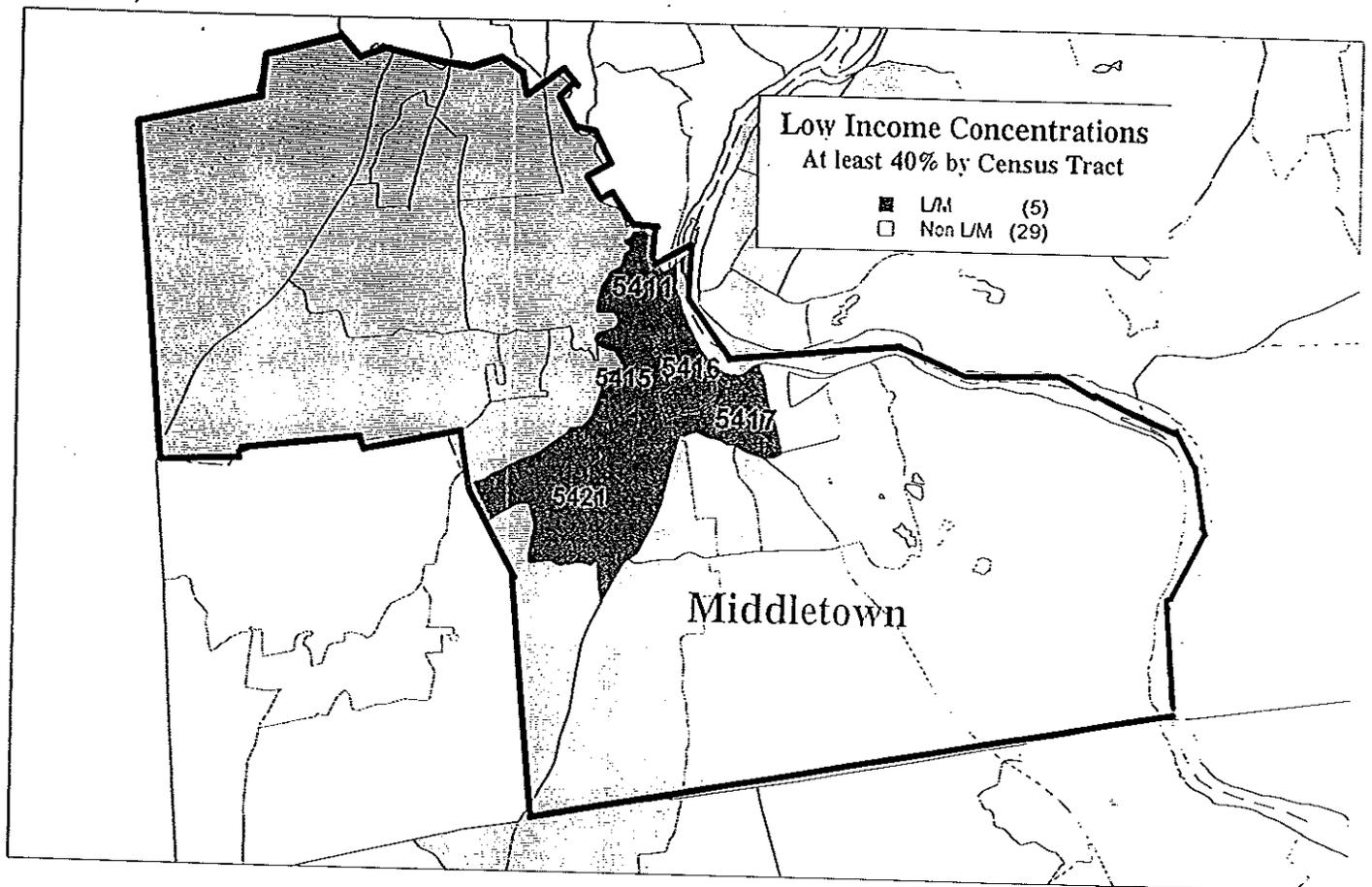
---

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

---

The term "area of low income concentration" is defined as any Census Tract where more than ½ of the households are low/moderate income. Reference is again made to Table "A". In Census Tract 5416, nearly 3/4 of all households fit that category. While not showing in excess of 50% of households in the critical income range, concern is also expressed for Census Tracts 5411, 5415, 5417, and 5421. For purposes of this analysis, Census Tract 5415 can be disregarded because it, in large part, represents students at Wesleyan University.

# MAP OF LOW INCOME CONCENTRATIONS



## Transportation

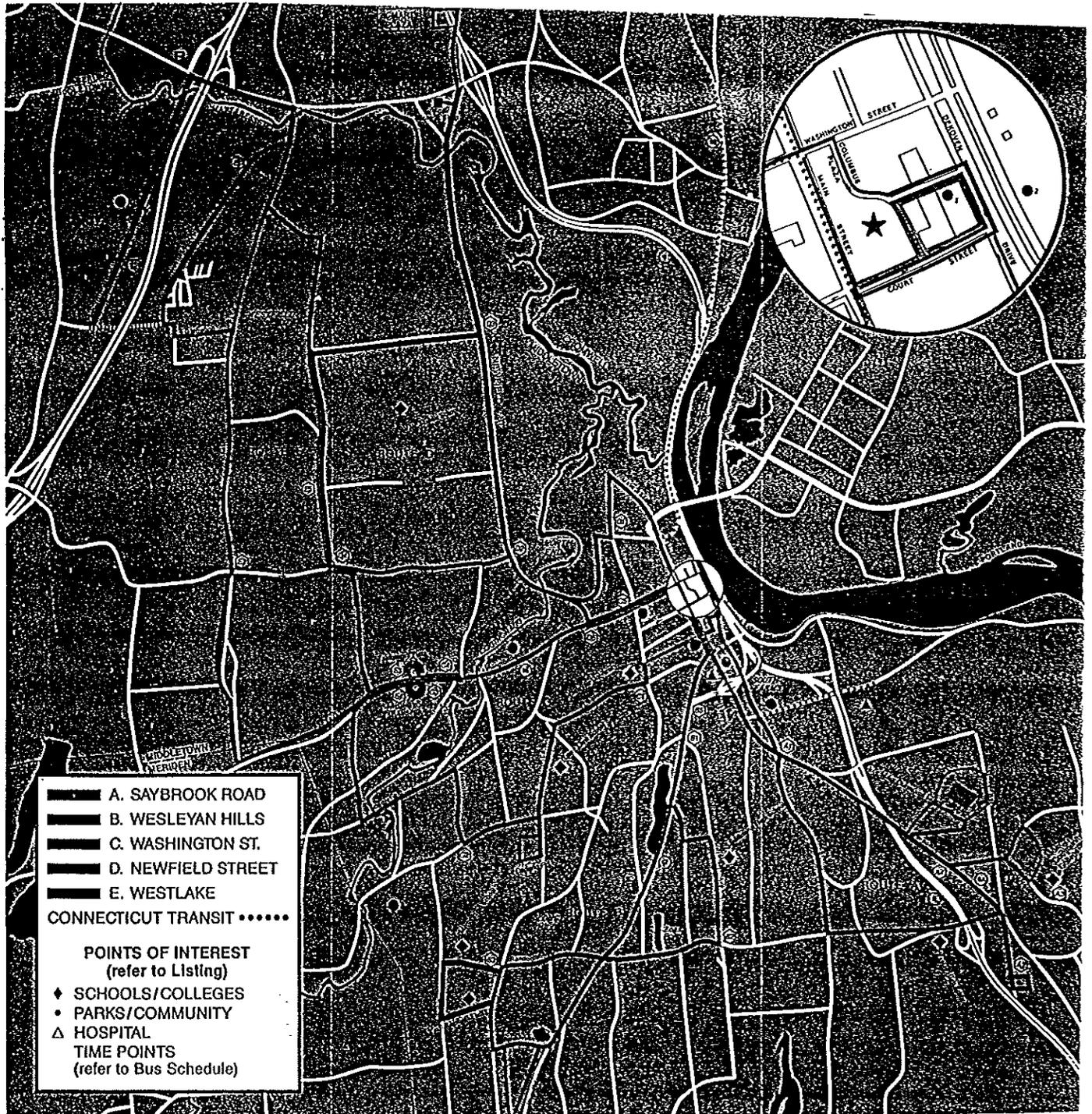
According to the 1990 Census, 87.5% of all persons employed traveled to work by automobile (or van in the case of some car pools). Only 2.1% or 492 residents relied on public transportation. Those census tracts exhibiting higher than average use of public transit are: 5411 (North End) - 3.8%; 5416 (CBD) - 9.9%; and, 5417 (South End) - 2.9%.

Those who either walked to work or worked at home represented 10.0% of the employed work force. Higher than average census tracts are: 5411 (North End) - 11.7%; 5421 (Long Hill North) - 11.5%; and, 5415 (Wesleyan) - 64.7%. The concentration of Wesleyan University faculty and staff in the neighborhoods surrounding the University becomes very evident.

The Consolidated Plan report prepared in 1995 cited transportation deficiencies which can directly be related to one's ability (or inability) to participate in educational and job opportunities, both of which equate to decent and affordable housing. From the Consolidated Plan: "The greatest need is for affordable public transportation which can link low income urban residents to job opportunities throughout the region. At every forum meeting held in February, March and April, 1995, providers and users indicated a serious need for transportation accessibility, especially after hours and evening transportation. The Middletown Transit District, MAT service, has six routes for local and area transportation which begins at approximately 6:00 a.m. but end prior to 7:00 p.m. weekdays and

on Saturdays begin at 8:45 a.m. and end at 5:30 p.m. The lack of after hour transportation is a deterrent for those wishing to attend adult education programs or have jobs outside of the day time working schedule. The State provides bus transportation from Eddy Home, Shepherd Home, River Valley services, Rushford Center and Long River Village locations; however, the service has been criticized for not being prompt or reliable and is costly. A monthly bus pass costs \$35 and service stops at 6:00 p.m. Currently, over 300 extremely low income persons and families living in only one of the City's several small geographic areas do not have direct access to any City buses. Residents of these neighborhoods cannot get to work and cannot afford to own and maintain a reliable vehicle of their own."

# MAP OF BUS ROUTES



## **Assisted Housing In Middletown**

The Middletown Housing Authority administers the Section 8 program for the City of Middletown. Presently, there are 351 units scattered about the City. Of that number, 106 are within Census Tract 5411, better known as the North End. Reference is made to Table "J" which shows minority settlement patterns. In 1990, Census Tract 5411 had 9.5% of all rental units in the City, yet has 30.2% of all Section 8 units in 1996. Similarly, Census Tract 5417 and 5420 show considerably higher percentages of Section 8 units when compared to total rental units. Conversely, Census Tract 5413 (predominantly the Westlake area) had nearly 20% of all rental units in 1990, but now only 4.8% of Section 8 units.

The last column of Table "J" indicates that throughout the City, 50% of all Section 8 units are occupied by minorities. Higher than normal minority/Section 8 concentrations are apparent in Census Tracts 5417, 5415 and 5416 - all of which are in and near the downtown. The Housing Authority reports a waiting list of two to three years for Section 8 units and is not accepting any new applications. Preference is given to Middletown residents; however, "residency" is not based upon the length of time living within the community. As noted previously, the Middletown Housing Authority administers the State owned moderate income housing areas for which there is a one to one and one-half year waiting period.

In recent years, more minorities have utilized the Section 8 program to move into housing developments, rather than owner occupied two or three family structures.

Thus, some ten families now occupy units at Forge Square with Section 8 vouchers. Growing numbers of Section 8 families are also residing in the Westlake area. Contrary to some reports, no Section 8 users reside in any Carabetta complexes with vouchers or certificates from the Middletown Housing Authority.

According to observers, it is not unusual for several related families to move into a housing development simultaneously, or at least within a short time frame. This pattern offers a comfort level of familial support for those leaving "projects".

In approving units for use by the Section 8 Program, HUD has established Fair Market Rents (FMRs) on a geographic basis which are annually published by HUD. Middletown is grouped with nearly sixty (60) other communities in the Hartford PMSA. As defined by HUD, "FMRs are gross rent estimates; they include shelter rent and the cost of utilities, except telephone. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. To accomplish this objective, FMRs must be both high enough to permit a selection of units and neighborhoods and low enough to serve as many families as possible. The level at which FMRs are set is expressed as a percentile point within the rent distribution of standard quality rental housing units. The current definition used is the 40th percentile rent, the dollar amount below which 40 percent of standard quality rental housing units rent." Thus, the 40th percentile FMR for existing housing in Middletown, as published in the Federal Register on September 20, 1996, is as follows:

<u>0-BR</u>	<u>1-BR</u>	<u>2-BR</u>	<u>3-BR</u>	<u>4-BR</u>
\$425	\$528	\$675	\$847	\$1,029

The Housing Authority, in its administration of the Section 8 program must do so in conformance with Section 504 of the Rehabilitation Act, the Fair Housing Amendments Act and Title II of the American Disabilities Act. Simply put, persons with disabilities enjoy the same rights to fair housing as minorities and other disadvantaged persons. Landlords must make "reasonable" changes to a building or to the building's rules and policies if a disabled person feels they are needed in order to live comfortably in either a house or an apartment. "Reasonable" is defined as a change that is possible. It also refers to an addition, like a ramp, which installed can either be removed when the disabled person moves out, or it will not bother the next tenant who lives in the unit.

According to the Middletown Housing Authority staff, disabled persons comprise a relatively small number of Section 8 users. Most are mentally disabled, not requiring any special physical modifications to the units. One Section 8 user is in a wheelchair. The Housing Authority has not been required to negotiate with landlords the provision of physical changes for 504 compliance.

The Middletown Housing Authority has received approvals for making some major modifications to the Long River Village public housing project. The five year plan calls for demolition of these units which were built in the early 1940's to be replaced by half the present number on site. The remaining units are to be disbursed throughout the City with Section 8 certificates.

Table "K" shows the number of dwelling units in projects by Census Tract. These only reflect those projects which have received State or Federal assistance and contain income guidelines for acceptance and rent schedules.

**TABLE "J"**  
**MINORITY LIVING PATTERNS**

<u>Census Tract</u>	<u>Rental Units (1990)</u>		<u>Section 8 Units (1996)</u>		<u>Minority Residential (1990)</u>	<u>Minority Section 8 (1996)</u>
	<u>Number</u>	<u>Percentage</u>	<u>Number</u>	<u>Percentage</u>	<u>Percentage</u>	<u>Percentage</u>
5411	786	9.5%	106	30.2%	11.6%	40%
5412	919	11.1%	20	5.7%	10.7%	47%
5413	1,650	19.9%	17	4.8%	13.9%	58%
5414	982	11.9%	33	9.4%	9.0%	48%
5415	437	5.2%	8	2.3%	12.4%	62%
5416	1,049	12.7%	47	13.4%	25.6%	60%
5417	448	5.4%	39	11.1%	33.5%	71%
5418	5	0.1%	0	0.0%	25.6%	0%
5419	847	10.2%	7	2.0%	14.6%	14%
5420	573	6.9%	44	12.5%	8.2%	47%
5421	517	6.2%	26	7.4%	21.3%	57%
5422	73	0.9%	4	1.1%	7.8%	50%
TOTALS:	8,286	100.0%	351	100.0%	14.4% Average	50% Average

Source: 1990 Census and Middletown Housing Authority

**CITY TABLE "K"**  
**ASSISTED HOUSING PROJECTS IN MIDDLETOWN**  
(Includes any Governmental Program Intended to Provide Shelter for Non-Standard Income People)

<u>CENSUS TRACT</u>	<u>NAME</u>	<u>LOCATION</u>	<u>UNITS</u>
5411	Meadoway (221d3) and Rose Circle 32-1BR, 170-2BR and 16-3BR	Newfield Street	218 ADU
5411	Newfield Towers (Elderly 236) 5-Efficiency, 74-1BR and 21-2BR	Newfield Street	100 ADU
5411	Stoneycrest (221d3) (Breakdown not available)	Newfield Street	49 ADU
5411	Stoneycrest Towers (Elderly 236) 5 Efficiency, 74 1-BR and 21-2BR	Newfield Street	100 ADU
5411	Willowcrest (221d3) 12-1BR, 113-2BR and 22-3BR	Newfield Street	147 ADU
5413	The Highlands (235) (Part of Westlake PRD)	Westlake Drive	201 DDU
5414	Bayberry Crest (236) 12-1BR, 128-2BR and 12-3BR	Plaza Drive	152 ADU
5414	New Meadows (236) 16-1BR, 14-2BR and 161-3BR	Washington Street	191 ADU
5414	Pond View Apartments (221d4) 52-1BR - Elderly	Butternut Street	52 ADU
5415	Old Middletown High School (Section 8) - Elderly 4-Efficiency, 57-1BR and 4-2BR (6 Reserved for Handicapped)	Court Street	65 ADU
5416	New St. Luke's (Section 8/Elderly) 7-Efficiency, 18-1BR and 1-2BR	Broad Street	26 ADU
5416	*Sbona Tower (Elderly, Turnkey 1) 82 Efficiency and 44-1BR	Broad Street	126 ADU
5416	South Green Apartments (Elderly 231) 103-1BR, 16-2BR and 6 for Handicapped	Church Street	125 ADU
5416	*Traverse Square (Turnkey 1) 6-1BR, 26-2BR and 28-3BR	Traverse Square	60 ADU
5417	*Maplewood Terrace (Turnkey 1) 12-2BR, 20-3BR, 14-4BR, 2-BR and 2-6BR	Maplewood Terrace	50 ADU
5419	*Long River Village (Town) 32-1BR, 80-2BR, 58-3BR and 20-4BR	Silver Street	190 ADU
5419	Summer Hill 28-1BR, 276-2BR and 18-3BR	Woodbury Circle	322 ADU
5421	**Rockwood Acres (MR11A-State) 42-2BR and 30-3BR	Long Lane	72 ADU
5421	**Santangelo Circle (MR11A-State) 25-2BR and 25-3BR	Santangelo Circle	50 ADU
5421	**Sunset Ridge (MR-11-State) 76-2BR	Wadsworth Street	76 ADU
5421	Wadsworth Grove 10-2BR and 35-3BR	McKenna Drive	45 ADU
5422	*Marino Manor 28 Efficiency and 12-1BR	Randolph Road	40 ADU

ADU - Attached Dwelling Unit  
DDU - Detached Dwelling Unit

\* Owned and operated by Middletown Housing Authority  
\*\* Owned by State; operated by Middletown Housing Authority

Again, from the State CHAS, the following concerning homelessness:  
"Homelessness is a growing problem in the Midstate Region. However, accurate estimates of the number of homeless are unavailable. It is apparent that a definite study of the homeless needs to be conducted in order to identify the needs and the magnitude of housing problems confronting this segment of the population. There are currently 309 beds in the region, all of which are located within the City of Middletown".

Recent changes to Connecticut's General Assistance laws threaten to increase the number of homeless persons throughout the State. GA benefits have been switched from a needs based grant to a flat grant which expires after nine (9) months into the fiscal year.

A breakdown of the location and number of beds available in emergency shelters and transitional housing is as follows:

#### Emergency Shelters

- Eddy Home at CVH - 30 beds, 14 cots
- American Red Cross Housing - Daddario Road - 7 family units with a total of 42 beds (often doubled up to 14 families)
- Community Health Center Battered Women's Shelter - 2 family units (10 beds)

### Transitional Housing

- Green Court on Green Street - 14 family units (60 beds)
- Rushford Center on Silver Street - 45 beds plus 8 apartments
- Shepherd Home at Connecticut Valley Hospital - 72 rooms
- YMCA on Crescent Street - 34 beds
- Connection's Women & Children's Center on Eastern Drive - 15 beds
- Gilead House - various locations - 23 beds in half way homes plus 47 beds in 22 shared apartments
- YMCA on Crescent Street - Youth Shelter - 11 beds
- Community Health Center Battered Women's Shelter - 14 beds

## **Agencies, Programs and Services That Assist In Fair Housing**

### **City of Middletown - Commission on Human Relations**

The Commission on Human Relations is a nine (9) member panel appointed by the Mayor for three (3) year staggered terms. The Commission's powers and duties are largely advisory and they include: the enlisting of a wide-range of community groups to eliminate prejudice, intolerance, bigotry and discrimination; the studies of problems of prejudice, intolerance, bigotry and discrimination; the making of recommendations to the Common Council for programs to address these issues; and, the receipt of complaints of racial, religious and ethnic group tensions. The Commission on Human Relations has a director assigned to it by ordinance which person acts as the staff and performs the duties and policies of the Commission.

For the most recently completed fiscal year ending June 30, 1996, the Human Relations staff reported 1,350 contacts categorized as follows: employment - 5.6%; housing - 1.0%; discrimination - 0.9%; information and referrals - 17.3%; legal - 4.9%; landlord/tenant - 5.7%; police - 0.7%; and, miscellaneous - 66.4%. Of the clients who contacted the office, 63.5% were White; 31.6% Black; 4.3% Hispanic; and, 0.6% of other races.

As with any City agency, it is beneficial to maintain a diversity of interests and expertise among the membership. The value of representation from the employment sector has been noted at Commission meetings. The absence of representation from the real estate community has similarly been noted, which should be addressed in order to make the Commission more effective in fair housing matters.

Following the retirement of the prior Director of Human Relations, that position has not, at this writing (November, 1996), been filled. One of the problems identified with the management of that office has been the lack of a paper trail of referrals to other agencies. Rather, the former director chose the route of persuasion by meeting with individuals face to face in order to resolve problems at the lowest possible level.

### **City of Middletown - Committee Concerning People With Disabilities**

This Committee of seven (7) members and two (2) alternates is composed of consumers, professionals and family members/interested citizens of the City. The Committee represents a focal point of many interests and affiliations. Its goal is to use the community's talents to facilitate the full inclusion of people with disabilities and, as such, primarily serves as a clearing house and sounding board for various projects. Because it is a volunteer group, the Committee stands to be useful as a resource.

## **Connecticut Commission on Human Rights and Opportunities (CHRO)**

Among the powers and duties of the CHRO are to receive, initiate, investigate and mediate discriminatory practice complaints, to hold hearings, to subpoena witnesses and to take testimony of any persons under oath related to discriminatory practice complaints and to study the problems of discrimination in all or specific fields of human relationships. According to a review of CHRO's housing cases filed since July 1985, there were a total of 1,178 cases. Of these, only eleven (11) originated from the City of Middletown - a rather low number when compared with other communities of similar size.

During the past year, five (5) complaints (no official cases) were received from City residents. Of these, two (2) reached agreement through the conciliation process. One of these involved a source of income discrimination while the other involved a family with children. Of the remaining three (3) cases, there were insufficient findings to warrant proceeding further. Again, from a staff attorney, the three major areas of housing complaints to CHRO are families with children, sources of income (particularly Section 8) and physical disability.

## **State of Connecticut Superior Court - Middletown Housing Court**

In general, a Housing Court handles the following types of problems: summary process (eviction); appeals from certain decisions of the Fair Rent Commission; actions involving discrimination in the sale or rental of residential property; actions involving violations of State or municipal health, housing, building, electrical, plumbing, fire or sanitation codes; and, actions for back rent, damages and return of security deposits. When an action is filed with the Housing Court, a housing specialist is assigned to assist in the case. The housing specialist's primary function is to mediate housing disputes, but is also responsible for the initial screening and evaluation of all contested housing matters. According to the housing specialist assigned to the Middletown Superior Court, the overwhelming litigation involves non-payment of rent and eviction. Of the 280 cases heard in the Middlesex County court facility in the past year, an estimated 70% or 200 originate from within the City of Middletown. In nearly every case, the housing specialist resolves the matter in a settlement which is then read into the court record and accepted by the judge. In the past year, only three (3) cases proceeded to trial.

Another estimated 100 cases per year, never proceed to the investigation stage. These were largely eviction matters in which the tenants moved out.

## **Connecticut Legal Services**

Connecticut Legal Services, Inc. (CLS) represents clients who are income eligible for a wide variety of services. In the area of housing, CLS seeks to "deter illegal behavior in the markets in which our clients find housing by representing clients in cases that suggest a serious lack of respect for tenants or housing applicants' rights by private landlords." Other priorities of CLS in the housing area include representing clients in asserting their rights to obtain or continue in subsidized housing and advocating for client's interests as public housing authorities, other subsidized housing operators and other agencies involved in the provision of housing subsidies make new rules affecting their rights.

According to the Executive Director of CLS, recent funding cutbacks and necessary downsizing of the staff has required CLS to focus their energies to address the most egregious cases. Additionally, in order to reach low income people with problems of a legal nature, CLS will begin to conduct clinics to advise low income persons about their legal rights and options which, in Middletown, might include forums at Head Start or Long River Village.

The Executive Director estimates that between 100 and 150 housing cases come from within the City of Middletown to be handled by CLS attorneys. By far, the largest number of cases involve evictions; however, lesser case work deals with Section 8 and public housing problems. CLS receives its

clients from two sources. One, the direct call (1-800) number in the New Britain Office and, secondly, from Statewide Legal Services.

### **Statewide Legal Services**

Statewide Legal Services is located at 437 Main Street, Middletown. This organization and its responsibilities were spun off of Connecticut Legal Services and functions as a "front end hot-line" which screens potential clients and advises strictly over the telephone. Approximately half of the case work going to the Connecticut Legal Services is as a result of this pre-screening by Statewide Legal Services.

### **Connecticut Fair Housing Center**

The Connecticut Fair Housing Center is a private non-profit agency providing advocacy services to low and moderate income individuals involved in fair housing disputes. The Center's office is in Hartford; however, they do accept clients throughout the region.

## **Community Reinvestment Act (CRA)**

This legislation requires all financial institutions to assess and develop programs to meet the credit needs of low and moderate income persons within each institutions respective market area. The Housing and Development Act of 1977 created the impetus for this program; the legislation was revised in 1995. It is administered by the Federal Reserve.

Connecticut also created CRA legislation (P.A. 89-295). It seeks similar goals. As a result, both of Middletown's remaining locally based banks (Liberty and Farmers & Mechanics) have been responsive to the changing needs to local residents and businesses by providing a wide range of Federal and State sponsored programs.

Liberty Bank has additionally created its Middletown Region CRA. Consisting of approximately a dozen bank directors and community lenders/activists, this advisory board meets twice yearly to recommend and evaluate programs to better serve low and moderate income persons throughout the bank's market area. The various programs seeks largely to teach money management skills to these persons. One of the primary benefits might well be to get these persons into the position of being able to handle the financial management of home ownership.

# Administrative Policies and Programs

## Zoning

The City of Middletown's Zoning Code is extremely inclusive and allows new lots to be created ranging from 15, 000 square feet to a minimum of 60,000 square feet depending upon the provision of public utilities. Additionally, there are special zones for the creation of multiple family structures and mixed uses on minimum lot areas of 10,000 square feet.

As noted in the 1995 Consolidated Plan, the City of Middletown has been aggressive in the development of a broad spectrum approach through the process of rental through ownership opportunities. The City has a number of homeless shelters, transitional housing, halfway houses, group homes, subsidized units through the Housing Authority, non-profits and privately developed units. There is also a supply of market rentals which range from moderate to up-scale. The ownership opportunities vary from subsidized cooperatives through Equity in Housing, through first time ownership through CAGMC, the housing rehabilitation loan program for housing improvements and market ownership opportunities.

Despite these permissive regulations, there has been some criticism citing a lack of "neighborhood" or "community" in certain portions of the City by not providing neighborhood commercial opportunities and neighborhood based services. Beginning in June 1996, the Planning and Zoning Commission entertained and approved a series of steps to reintroduce rural

commercial areas to the Zoning Code, Plan of Development and Zoning Map. Responding to an inquiry from a businessman and with the support of the City's Economic Development Committee, the Planning and Zoning Commission amended the Plan of Development to recognize five (5) potential rural commercial areas and, further, amended the Zoning Map to approve one of them.

### **Housing Development Zone**

In 1990, the City of Middletown applied for and later received designation as one of the two communities in the State of Connecticut with a Housing Development Zone. This designation, received from the (former) Connecticut Department of Housing is for a geographic area in the North End concurrent with the boundaries for the North End/CBD Urban Renewal Project. This designation is in response to the long-standing need for housing assistance in the older portions of the community which are inhabited by a wide-range of minority and low and moderate income persons and families.

One of the conditions of approval for Housing Development Zone was passage of a tax abatement on low and moderate income housing which has been embodied into the Middletown Code of Ordinances as Chapter 28, Section 28-1. In short, this ordinance allows for tax abatement for building, or improving substantially, housing occupied by low and moderate income persons. The State reimburses the City for tax abatements granted under this program. The abated taxes are to address

one or more of the following purposes: the reduction of rents below levels which would be achieved in the absence of an abatement; the improvement of housing quality and design; the encouragement of occupancy by persons and families of varying income levels; and, the provision of necessary related facilities and services for those residential areas.

## **Residential Rehabilitation Programs**

Since 1976, the City of Middletown, through its Community Development Block Grant Program, has provided funds for the rehabilitation of properties primarily owned and/or occupied by low and moderate income persons. With a constant focus of over twenty years addressing housing problems in and around the Central Business District and North End, the program seeks to correct code violations in single family, multi-family or mixed-use (commercial/residential) structures. The program is currently administered for the City of Middletown by the Housing Rehabilitation Institute, Inc. whose primary office is in New Haven. Typically, the applicant can receive up to 50% of the cost of rehabilitating a structure at an interest rate below market level as determined by the Application Review Committee. In cases of hardship, deferred loans are exercised for all or a portion of the cost of addressing needed housing repairs and improvements. The program currently operates from a revolving loan fund fed by principal and interest payments.

## **Down Payment Assistance Programs.**

The City of Middletown has entered into a series of contracts with Community Action for Greater Middlesex County, Inc. (CAGMC) whereby Community Development Block Grant funds are made available for administration by CAGMC to assist low and moderate income persons in housing acquisitions.

The first contract, signed in 1994 with monies from the Affordable Housing Revolving Fund, allow a package of down payment assistance loans and closing cost grants for first-time home buyers. In order to qualify for the Down Payment Closing Cost Assistance Program, eligible participants must complete the following workshops and programs: First-Time Home buyers Seminar/Education Program; Budgeting Workshop and Individual Financial Counseling; and, Home Owners Rights and Responsibilities Workshop.

Under the 1995 Entitlement Program, CAGMC was approved for \$50,000 to administer a First-Time Homeowner/Multi-Family Down Payment Assistance Program whereby closing costs, grants up to \$3,000 and down payment assistance loans up to \$10,000 are made available for first-time home buyers currently living in subsidized rental units in Middletown. This program is administered in cooperation with the Middletown Housing Authority which Agency will offer up to twenty-four (24) Section 8 Rental Subsidy Certificates to provide cash flow in the purchase of multi-family units. As in the other program, prospective buyers must attend four (4) educational seminars to be conducted by CAGMC and be awarded a Certificate of Completion.

# Identification of Impediments to Fair Housing Choice

## Rental and Section 8 Markets

According to persons familiar with the Middletown rental market, some of the housing impediments evident in the rental market include the following:

- ▶ Many landlords demand two (2) months rent deposit plus one (1) month advance rent which could be as much as \$1,800 in cash required as a security deposit
- ▶ Investment properties are not being resold openly on the market. It is perceived that landlords are taking a tax break by not renting some units.
- ▶ Over the past several years, new housing sales prices have dropped. However, rents have not dropped correspondingly. It is perceived that some landlords are willing to let units remain empty rather than rent them at a reduced rate.
- ▶ Certain sectors of the community - most notably the North End - do not advertise the availability of units. Rather, it is by word of mouth in order to exclude the "wrong kind of people".
- ▶ While no hard evidence exists, there is a perception of prejudice toward renting to minorities, single parents, disabled or AFDC recipients.

- ▶ Several of the surrounding towns do not share a burden for renting units to minorities, single parents, disabled and AFDC recipients.

Again, while no written evidence exists of discriminatory practices, complaints have been registered with housing activists where landlords attempt to evict, lock out, harass for rent or not properly repair rental units. Housing activists report that the Connecticut Legal Services might have taken on some of these cases if there were extenuating circumstances. However, landlords typically "back off" when confronted by the law or by the representatives of the effected tenant.

Similarly, tenants often don't possess the resolve to pursue ~~their housing~~ their housing rights when representing themselves. Rather than engaging in what is often perceived as a long process, many tenants simply move out. While dramatically reducing the Housing Court case load. This practice does not resolve illegal practices. Some assistance is offered by the Clerk's office at the Housing Court whereby at least one clerk is required to be an attorney and to provide pro se assistance (assistance to persons representing themselves). One lawyer familiar with the system suggested that pro bono services be offered from the Middlesex County Bar Association.

As noted previously, the Middletown Housing Authority, with HUD's assistance, intends to demolish Long River Village and rebuild at half the present density. This assumes that adequate resources will be made available to disburse current residents throughout Middletown. Detractors of this plan warn there is no evidence of additional Section 8 certificates

coming to the community and, secondly, if they do come, question the effect upon young women with children who will be placed throughout the community and not tied back into the project with support services which are so essential to their survival.

The plan for Long River Village is very ambitious, but achievable. However, the fact remains that the waiting period for Section 8 units is two to three years and the waiting period for Middletown Housing Authority administered moderate income housing is one to one and one-half years.

The obvious conclusions drawn are that there are not enough Section 8 units available for the City and, secondly, the lack of moderate income housing is a deterrant to upward mobility from lower income housing.

## **Home Ownership Opportunities**

According to real estate reports for the period January 1 through July 31, 1996, the average sales price of a single family detached home is \$135,000. This represents 157 closings. Forty-seven percent (47%) of these closings represent sales under the average price. Nineteen percent (19%) of these closings represent sales of less than \$99,000.

The real estate reports further show that the inventory of single family detached housing on the market in Middletown consists of 203 units. Only thirty-nine percent (39%) are under the average sales price while thirteen percent (13%) are less than \$99,000. The quick conclusion drawn from

this information is that closings occur with greater frequency at the lower price ranges when compared to units being offered on the open market. These numbers do not include condos which typically do not exceed \$100,000.

According to a real estate broker, the greatest inventory of available housing in the City of Middletown is in the \$80,000 to \$120,000 price range. However, buyers do not want "fixer uppers" which are characterized in the inventory of housing as built between 1920 and 1950. Buyers are not willing to put in the sweat equity necessary to upgrade these units, nor are they willing to deal with environmental problems such as lead based paint. What buyers really want is a brand new house. However, the minimum price for a new unit is \$129,000 (on an extremely small lot). The problem is not enough new low priced housing stock within the City of Middletown.

Some of the problems associated with first-time home owners being denied opportunities include the following:

- ▶ source of income discrimination;
- ▶ lack of housing subsidies precluding movement into nicer neighborhoods;
- ▶ past credit problems which may have nothing to do with current ability to pay;
- ▶ banks' failure to do more in terms of community reinvestment;

- ▶ the cost of new housing which is unfair to the "masses" and, concurrently, the obsolescence of the old "25% rule" which now necessitates 50% to 60% of gross income being put to housing costs;
- ▶ a new generation of home buyers with no sweat equity skills who have grown up in apartments or projects;
- ▶ the loss of income through downsizing and the elimination of overtime checks which were relied upon for living expenses;
- ▶ the inability of first time home buyers to save for down payment and closing costs; and,
- ▶ the banking community's response in the late 1980's to scrutinizing buyers' credit histories.

## **The Mortgage Lenders Dilemma**

While everyone agrees that down payments are the biggest problem, the method in achieving a down payment works against the lower income persons and minorities. Those at the lower income levels tend to have minimal savings and live check-to-check. First time home buyers, with extended support, can often get down payments from other sources within their respective families. Hence, for some first time home buyers, down payment and closing cost assistance is offered currently through the

Community Action for Greater Middlesex County and the Community Development Block Grant program. Presently, the consumers are more conservative and practical and are asking themselves - "what can we afford?"

As a quick comparison of the income necessary to purchase new housing, two (2) scenarios were explored with all normal assumptions in place. First, new single family detached home selling for \$133,000 with 3% down on a thirty (30) year note would require, at a minimum, an annual salary of \$40,500. In this case, 33% of the salary would go toward housing costs.

On the lower end of the scale, a condominium unit selling for \$50,000 with similar constraints of 3% down , a \$100 per month condo fee and other month fees including taxes, mortgage insurance would, over a thirty (30) year period, require a minimum annual salary of \$22,000.

One of the major considerations facing mortgage lenders is other debt. For example, a family with income in the mid \$20,000 range, looking to purchase a new house, is often faced with monthly car payments of \$300 or more. This can amount to 13% to 14% of a family's gross annual income. This factor has come into play in several cases of the prequalification process for first time home buyers for the Military Road housing project, a project of the Middletown Housing Partnership Trust.

## **Location, Location, Location**

While one housing activist claims that minorities are only shown housing in certain parts of the community, a minority real estate broker said locational limitations are a matter of affordability which excludes large portions of the City. Others from within the minority community claim that parts of Middletown have a "bad reputation". Minorities who can afford housing or rental opportunities and who don't choose to live in those sections defend their choices by maintaining that those areas are not desirable for upward mobility.

The lack of affordable housing at the low end creates a problem for persons moving from project to project and never escaping the cycle of subsidized housing.

As noted earlier, many families which have begun their upward mobility through better housing still appreciate a sense of community offered by the neighborhood store and often find that feature lacking in many parts of the City.

## **Transportation**

As noted by bankers, automobile ownership is a major problem. As such, it is a "two-edged sword". Vehicular transportation is necessary in order for families to seek and secure employment opportunities. At the same time, car payments are a major drain on gross income and can lead to

families being deemed over extended for purposes of buying a new home. Another respondent noted that transportation is a major issue for securing job opportunities in Middletown and lack of transportation is a disincentive for upward mobility. For those who are dependant upon public transportation, the Consolidated Plan of 1995 noted that the lack of after hours transportation is a deterrent for those wishing to attend adult education programs or have jobs outside the daytime working schedule.

## Potential Actions to Further Fair Housing

- ▶ Hire a Human Relations Director with appropriate staff support
- ▶ Institute a formal intake process through the development of forms for various types of complaints. Maintain files indicating disposition of cases.
- ▶ Consider establishment of fair rent controls.
- ▶ Fill the next vacancy on the Commission on Human Relations with a representative of the real estate community. Maintain membership from both real estate and employment services on Commission.
- ▶ Encourage Planning & Zoning Commission to approve additional rural/commercial neighborhood areas, particularly where concentrations of low and moderate income families either currently lived or are likely to migrate to.
- ▶ Promote availability of programs designed to assist either in the purchase of homes by first time home buyers or in the rehabilitation of residential structures owned or occupied primarily by low and moderate income families.
- ▶ Actively support requests by the Middletown Housing Authority to HUD for additional Section 8 units.

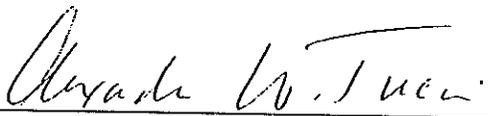
- ▶ With the Middletown Area Transit Board and staff, seek modifications to the bus routes and/or schedule which will afford greater ridership and educational/job opportunities for those who, for the lack of private transportation, are denied such.
- ▶ Encourage area legal associations to donate pro bono services for persons needing assistance in order to pursue their fair housing rights.
- ▶ Explore other avenues of legal assistance which might be available from academia (Yale Law School/UCONN Law School) or from national advocacy offices.
- ▶ Encourage outreach activities by all financial institutions doing business in Middletown in order to develop fiscal skills and new housing opportunities for low and moderate income persons.
- ▶ With the Connecticut Legal Services staff, promote and encourage attendance at workshops and training sessions in order to more effectively educate citizens on fair housing matters at a time when Connecticut Legal Service's staff resources are severely strained.

## Effectivity

The City of Middletown has determined through its Identification of Impediments to Fair Housing Choice, contained as in the foregoing Fair Housing Plan, that it is in compliance with requirements to affirmatively further fair housing. A continuation of existing programs and the development of new methods to improve housing choice will ensure continued compliance with the requirements embodied in Section 808(e)(5) of the Fair Housing Act and the regulatory requirements of the CDBG, ESG and other applicable HUD programs. Improvements and amendments to the City's Fair Housing Plan may be made as needed in response to improved outreach and education, changes in the banking and real estate industries, and public input and criticism. The Identification of Impediments supporting documentation will be kept current to ensure continued compliance and improvement.

APPROVAL:

COMMISSION ON HUMAN RELATIONS

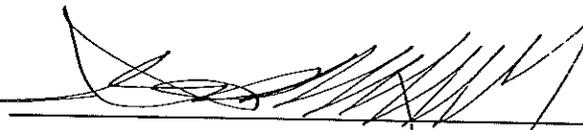


Alexander Tucci, Chairman

12/6/96  
(Date)

**CERTIFICATION:**

**CDBG PROGRAM ADMINISTRATOR**



---

William M. Kuehn, Jr.  
Municipal Development Director

12/17/96  
(DATE)

**CHIEF ELECTED OFFICIAL  
CITY OF MIDDLETOWN**



---

Maria Madsen-Holzberg  
Mayor

12/17/96  
(DATE)

## **Appendix**

- 1. Ordinance No. 88-16 - Creation of City of Middletown Housing Partnership**
- 2. Ordinance Section 28-1 - Tax Abatement on Low and Moderate Income Housing**
- 3. Ordinance Section 24-10 - Establishment of Commission on Human Relations**
- 4. Ordinance Section 14-20 - Fair Housing**
- 5. Resolution - Committee Concerning People With Disabilities**
- 6. Informational Brochure - CDBG Residential/Mixed Use Rehabilitation**

Middletown Code of Ordinances

Unclassified Ordinances

#88-16:

Creation of City of Middletown Housing Partnership; Powers; Duties.

- (A) There is hereby created the City of Middletown Housing Partnership which agency shall work with the community, the Department of Housing and other State agencies to solve housing problems faced by the community and develop ways to increase the supply and availability of affordable housing in the City of Middletown. The Middletown Housing Partnership shall consist of the following members: the Mayor of the City of Middletown; representatives from the Planning and Zoning Commission, the Inland Wetlands and Watercourses Agency, the Housing Authority and the Municipal Development Committee not to exceed five (5) in number; representatives of the City of Middletown business community not to exceed four (4) in number; representatives of public interest groups not to exceed six (6) in number; and Middletown Urban Planning, land use and housing professionals, not to exceed four (4) in number. Said members shall be appointed by the Mayor and confirmed by the Common Council. Each member shall serve for a term of two (2) years. Each vacancy shall be forthwith filled by the Mayor with the confirmation of the Common Council for the unexpired portion of the term of the member whose place shall become vacant. At its first meeting, the Partnership shall elect a chairman and a secretary.
- (B) The responsibilities of the municipality of the City of Middletown, in order to receive initial designation under the Connecticut Housing Partnership program, shall include the following:
- (1) Submit evidence to the Commissioner of Housing that the City of Middletown Housing Partnership has been formed in accordance with P.A. 88-305; and
  - (2) Submit evidence to the Commissioner of Housing that sufficient local resources have been committed to the City of Middletown Housing Partnership.
- (C) The duties of the City of Middletown Housing Partnership, in order to receive development designation under the Connecticut Housing Partnership Program, shall include the following:
- (1) To examine and identify housing needs and opportunities in the community;
  - (2) To explore the availability of any state, municipal or other land that is suitable for the development of affordable housing;

Middletown Code of Ordinances

Unclassified Ordinances

- (3) To review applicable zoning regulations to determine whether such regulations restrict the development of affordable housing in the community;
  - (4) To identify any necessary changes to such regulations;
  - (5) To establish priorities and develop a long-range plan to meet identified housing needs in the community consistent with regional housing needs;
  - (6) To establish procedures for the development of a written proposal to achieve such priorities in accordance with said plan; and
  - (7) To start an activity, development or project designed to create additional affordable housing in the City of Middletown.
- (D) At all times when any orders, rules and regulations made and promulgated pursuant to this ordinance shall be in effect, they shall supersede all existing ordinances, order, rules and regulations insofar as the latter may be inconsistent therewith.
  - (E) This ordinance shall not be construed so as to conflict with any State or Federal State, rule or regulation.
  - (F) No person shall have the right to expend any public funds of the municipality in carrying out any Partnership activities authorized by this ordinance without prior approval by the legislative body nor shall any person have any right to bind the municipality by contract, agreement, or otherwise without prior and specific approval of the legislative body.
  - (G) The effective date of this ordinance shall be as set forth in the Charter of the City of Middletown.

(8/8/88)

Middletown Code of Ordinances

Chapter 28

Sec. 28-1. Tax Abatement on Low and Moderate Income Housing.

(a) Definitions.

For the purposes of this article:

"Low and moderate income housing" means housing, the construction or rehabilitation of which is aided or assisted in any way by any federal or state statute, which housing is subject to regulation or supervision of rents, charges or sale prices and methods of operation by a governmental agency under a regulatory agreement or other instrument which restricts occupancy of such housing to persons or families whose incomes do not exceed prescribed limits.

"Owner" means a person or persons, partnership, joint venture or corporation who or which has executed, or will execute, a regulatory agreement or other instrument with a governmental agency, either federal, state or local, which limits occupancy of the low and moderate income housing owned or to be owned by such person or persons, partnership, joint venture or corporation to persons or families whose incomes do not exceed prescribed limits.

(b) Contracts for abatement.

(1) The mayor may enter into contracts for the city with owners of low and moderate income housing, granting abatement, in whole or in part, of the taxes on the real estate used for such low and moderate income housing.

(2) The amount of such abatement shall be established in each such contract, giving due consideration to the purpose or purposes to which the money equivalent of the taxes so abated is to be applied. Each such contract shall require that the owner apply the money equivalent of the taxes so abated to one or more of the following specified purposes:

A. To reduce rents below the levels which would be achieved in the absence of abatement;

B. To improve housing quality and design;

C. To effect occupancy by persons and families of varying income levels, within prescribed limits; or

3/15/91

Middletown Code of Ordinances

Chapter 28

D. To provide necessary related facilities or services.

(c) Effective date, duration of abatement.

The abatement shall become effective on the date specified in the contract between the city and an owner of low and moderate income housing. The term of abatement shall extend for the remainder of the fiscal year in which abatement becomes effective and may continue for a period not to exceed thirty-nine (39) consecutive fiscal years thereafter; provided, that such abatement shall terminate at any time when the property for which tax abatement had been granted is not used solely for low and moderate income housing; and provided further, that the continuation of such abatement may be conditioned upon the continuation of state reimbursement to the city for such abatement. The abatement authorized herein shall be granted only for low and moderate income housing upon which construction or rehabilitation commenced after July 1, 1967.

(d) State assistance.

The mayor shall, with the approval of the common council, execute on behalf of the city contracts with the state for financial assistance by the state in the form of reimbursement for the tax abatement granted to an owner of low and moderate income housing in accordance with this article.

(10/13/70; 10/2/78)

Sec. 28-2. Exemption For Solar Energy Heating and Cooling Systems.

(a) A tax exemption is hereby authorized for any building, the construction of which is commenced on or after October 1, 1976, and before October 1, 1991, which is equipped with a solar energy heating or cooling system, or any building to which a solar energy heating or cooling system is added on or after October 1, 1976, and before October 1, 1991, to the extent of the amount by which the assessed valuation of such real property equipped with such solar heating or cooling system exceeds the assessed valuation of such real property equipped with the conventional portion of the heating or cooling system, exclusive of any portion of such system related to solar energy, provided this exemption shall only apply to the first fifteen assessment years following the construction of such building or addition of any such system to a building.

3/15/91

Middletown Code of Ordinances

Chapter 24

ARTICLE II. HUMAN RELATIONS

Sec. 24-10. Commission on Human Relations Established.

It being essential to the health, safety and welfare of this city and its inhabitants that differences of race, creed and national origin serve as sources of individual and community strength rather than as causes of discrimination, segregation and restricted opportunity, a Commission on Human Relations shall be and is hereby established.

(1/4/65; 9/7/82)

Sec. 24-11. Commission on Human Relations: Membership; Terms; Chairman; Vacancy.

This Commission shall consist of nine members who shall reside in or be employed in the City of Middletown. They shall be appointed by the Mayor with the consent of the Common Council and shall serve without compensation. Of the nine members first appointed, three shall serve for a term of three years (one of whom shall be designated as the Chairman of the Commission); three shall be appointed for a term of two years; and three shall be appointed for a term of one year. After the first term of three years, the Commission shall then elect its own Chairman, and thereafter all appointments to the Commission shall be for a term of three years. In the event of the death, disability or resignation of any member of the Commission, his successor shall be appointed by the Mayor with the approval of the Common Council to serve the unexpired period of the term.

(1/4/65; 9/7/82)

Sec. 24-12. Commission on Human Relations: Functions.

The functions of the Commission shall be:

1. To foster mutual understanding and respect among all racial, religious, and ethnic groups of the community.
2. To ensure equality of treatment of any racial, religious, or ethnic group, or any of its members.
3. To assure equality of opportunity for all individuals.

Middletown Code of Ordinances

Chapter 24

4. To cooperate with governmental and non-governmental agencies and organizations having functions similar to those of this Commission.

5. To make such studies as in the judgment of the Commission will aid in furthering the aims of this Ordinance.

(1/4/65; 9/7/82)

Sec. 24-13. Commission on Human Relations: Powers and Duties.

The powers and duties of the Commission shall be:

1. To enlist the cooperation of the various racial, religious, and ethnic groups, community organizations, labor organizations and fraternal and benevolent associations, and other groups in programs and campaigns devoted to eliminating group prejudice, intolerance, bigotry and discrimination.

2. To study the problems of prejudice, intolerance, bigotry, discrimination and disorder occasioned thereby in all or any fields of human relationship.

3. To receive complaints of racial, religious and ethnic group tensions, prejudice, intolerance, bigotry, and disorder occasioned thereby, and discrimination against any persons, group of persons, organizations, or corporations, and to refer such complaints to the proper agency having jurisdiction in the particular matter.

4. To publish, when appropriate, publications and reports of research designed to promote good will and to minimize or eliminate prejudice, intolerance, bigotry, and discrimination.

5. To recommend to the Common Council legislation to aid in implementing, improving or strengthening programs to accomplish equality of opportunity and the elimination of prejudice, intolerance, bigotry and discrimination.

(1/4/65; 9/7/82)

Sec. 24-14. Commission on Human Relations: Assistance of City Agencies.

Middletown Code of Ordinances

Chapter 24

The Commission on Human Relations shall have available the services of other city departments and agencies for the assistance of the Commission in its proper functions.

(1/4/65; 9/7/82)

Sec. 24-15. Commission on Human Relations: Director.

There shall be a Director of the Office of Human Relations to be appointed by the Mayor with the consent of the Common Council. The Director shall act as the staff for the Commission on Human Relations and shall perform the duties required by ordinance or resolution of the Common Council.

(9/7/82)

ARTICLE II. FAIR HOUSING ORDINANCE

Sec. 14-20. Fair Housing; Purpose.

It is the policy of the City of Middletown that no person shall discriminate with respect to housing in the City of Middletown in violation of any federal, state or local law.

(6/1/81)

Sec. 14-21. Discrimination in the Rental, Sale or Financing of Housing Prohibited.

(a) It shall be unlawful to refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, or to discriminate in the terms, conditions or privileges of sale or rental of housing accommodations or in the provision of services or facilities in connection therewith, because of race, creed, color, national origin, ancestry, sex, marital status, age, mental retardation or physical disability.

(b) It shall be unlawful for any person, bank, building and loan association, insurance company or other corporation, association, firm or enterprise whose business consists in whole

Middletown Code of Ordinances

Chapter 14

or in part in the making of real estate loans, to deny a loan to a person applying therefor for the purpose of purchasing, constructing, improving or repairing housing, or to discriminate against him in the fixing of the amount, interest rate, duration or other terms or conditions of such loan because of race, creed, color, national origin, ancestry, sex, marital status, age, mental retardation or physical disability.

(c) (1) The provisions of this section shall not apply (A) to the rental of housing in a building which contains housing accommodations for not more than two families living independently of each other, if the owner or members of his family reside in one of such housing accommodations, or (B) to the rental of a room or rooms for housing accommodations, if such rental is by the occupant of the housing accommodation, or by the owner of the housing accommodation and he or members of his family reside in such housing accommodation.

(2) The provisions of this section with respect to the prohibition of sex discrimination shall not apply to the rental of sleeping accommodations provided by associations and organizations which rent all such sleeping accommodations on a temporary or permanent basis for the exclusive use of persons of the same sex.

(3) The provisions of this section with respect to the prohibition of discrimination on the basis of marital status shall not be construed to prohibit the denial of housing accommodations to a man and a woman who are both unrelated by blood and not married to each other.

(4) The provisions of this section with respect to the prohibition of discrimination on the basis of age shall not apply to minors, to federal or state-aided or municipal housing for elderly persons, to special discount or other public or private programs to assist persons sixty years of age and older or to privately owned housing developed and maintained exclusively for persons within specified age groups.

(5) The provisions of this section with respect to the prohibition of discrimination on the basis of physical disability shall not require any person to modify his property in any way or provide a higher degree of care for a physically disabled person than for a person not physically disabled.

Middletown Code of Ordinances

Chapter 14

(6) Nothing in this section shall prohibit a religious organization, association or society, or any nonprofit institution or organization operated, supervised or controlled by or in conjunction with a religious organization, association, or society, from limiting the sale, rental or occupancy of dwellings which it owns or operates for other than a commercial purpose to persons of the same religion or to members of the association or society, or prohibit a private club not in fact open to the public, which as an incident to its primary purpose or purposes provides lodgings which it owns or operates for other than a commercial purpose, from limiting the rental or occupancy of such lodgings to its members or from giving preference to its members.

(6/1/81)

Sec. 14-22. Complaints of Violations.

Any person who claims to have been injured by a violation of Sec. 14-21 may file a complaint with the Human Relations Director. Such a complaint shall be filed within ninety (90) days after the alleged violation occurred. Complaints shall be in writing, shall state the facts upon which the violation is based and shall be verified. Upon receipt of a complaint, the Human Relations Office shall furnish a copy of the same to the person or persons allegedly committing the violation with the request that a verified answer be filed with the Human Relations Office within twenty (20) days of receipt of the copy of the complaint. After receipt of the answer or upon the expiration of the twenty (20) days without receipt of an answer, the Human Relations Director shall proceed to try to mediate the dispute and eliminate or correct the alleged violation by informal methods of conference, conciliation and persuasion. Nothing said or done in the course of such proceedings may be made public or used as evidence in a subsequent proceeding under this ordinance without the written consent of the person concerned. If the Human Relations Director is unsuccessful in resolving the complaint, then the matter shall be referred to the State Commission on Human Rights and Opportunities or, if the violation of this ordinance also constitutes a violation of a state or federal statute, to other appropriate state or federal authorities.

(6/1/81)

## Resolution

Whereas in recognition of the handicapped individuals in our Community and the need for assistance in living conditions and improvements socially, recreational, and physical.

Whereas this committee shall meet monthly and make recommendations and provide assistance to assure that essential needs and improvements for the handicap are brought to the appropriate forum,

Whereas the committee shall report to the Mayor and Common Council in at least six-month intervals from the date of this resolution,

Be it therefore resolved by the Common Council of the City of Middletown that the Mayor with the approval of the Common Council shall hereby appoint as a committee, for 2 year terms, The Handicap Committee, whose membership shall consist of at least two handicap members and three members from the community at large.

Submitted by:  
Councilman Emanuel A. Pattavina

## **CDBG RESIDENTIAL/MIXED USE REHAB**

.....in order to:

- *preserve the quality of Middletown's housing stock*
- *enhance the character of its residential neighborhoods*
- *encourage owners to rehabilitate their residential properties*
- *rehabilitate sub-standard housing units while assisting low and moderate income residents*

**Low interest Loans are available to Middletown homeowners, for up to 50% of the cost of residential and mixed use rehabilitation to benefit low and moderate income households.**

The Residential / Mixed Use Rehabilitation Loan Programs were created as part of the Community Development Block Grant Program, and is a Revolving Fund to help revitalize Middletown's older housing stock by providing very low interest loans to low and moderate income homeowners or owners whose tenants are principally of low and moderate incomes.

### Guidelines at a Glance:

- All residential properties in the City of Middletown are eligible depending upon need.
- HUD definition of moderate income is between 50% - 80% of the median income; low income is less than 50% of the median.
- Median income in Middletown for a household of one is \$38,900; of two, \$44,500; of three, \$50,000; of four, \$55,600; of five, \$60,000; and of six \$64,500.
- The amount of private matching financing is 50%.
- Term of the loan is variable depending upon ability to pay.
- The owner and/or a minimum of 50% of the tenants must be low or moderate income households.
- Facade grants are available for owners of downtown, mixed use properties within a historic district.

*...for further information*

City of Middletown  
Municipal Development Office  
245 deKoven Drive  
Middletown, CT 06457  
Phone (860) 344-3419 / Fax (860) 344-0136  
C:\BROCIURE\RESREHAB.DOC

*...for an application packet and preliminary inspection:*

Warner Marshall, Executive Director  
Housing Rehabilitation Institute  
209 Sherman Ave.  
New Haven, CT 06511  
Phone (203) 946-8372 / Fax (203) 946-8374

Human Relations Commission

The undersigned have reviewed the draft Fair Housing Plan and hereby recommend its approval and signature by the Chairman.

Name

Alexander W. Tucci  
Alexander Tucci, Chairman

December 6, 1996

Annette B. Ward  
Annette Ward, Vice Chairman

December 6, 1996

Jesse Hunter  
Jesse Hunter

December 6, 1996

Joanne Massey  
Joanne Massey

December 6, 1996

John Wood  
John Wood

December 6, 1996

✓

It is understood that the Commission will ratify this approval at the next meeting at which time a quorum is present.