

Analysis of Impediments to Fair Housing Choice

CITY OF NEW BEDFORD, OFFICE OF HOUSING & COMMUNITY DEVELOPMENT, OCTOBER 2021

Prepared for the New Bedford Office of Housing and Community Development
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1.0 Introduction

BACKGROUND

The Fair Housing Act (Act), passed in 1968, established that all Americans, regardless of their race, color, national origin, religion, sex, familial status, or disability, deserved to live in homes and neighborhoods of their choosing. The Act also spelled out that communities that receive federal funds from any source have a responsibility to Affirmatively Further Fair Housing (AFFH). In 1995, the U.S. Department of Housing and Urban Development (HUD) issued guidance for grantees of HUD funds through the Fair Housing Planning Guide. The guide outlined how state and entitlement grantees met planning requirements through the Analysis of Impediments to Fair Housing Choice (AI). For many years, HUD grantees complied with the fair housing planning requirement under this guidance. In 2015, the Obama administration passed a new fair housing rule and issued guidance for a new planning process - the Assessment of Fair Housing, or AFH.

To support the AFH planning process, HUD compiled and released nationally uniform data sets to aid grantees with their analysis. HUD’s 2015 guidance also took into account the many factors that affect fair housing choice and access to opportunity based on where people live, emphasizing that “zip code matters” when determining life outcomes for individuals including health, education, and wealth. The 2015 rule dictated that grantees consider blatant discriminatory practices and conditions that blocked people’s access to educational, employment, and health opportunities. The language around fair housing expanded to include examining amenities and disparities in the provision of services across neighborhoods. HUD also required grantees to take meaningful and measurable actions to further fair housing and tied acceptance of the AFH to receipt of HUD block grant funds.

In 2019, HUD suspended the 2015 rule and the requirement to complete an AFH and guided grantees back to the Analysis of Impediments planning process. Since then, HUD has proposed a new rule that would further simplify grantees' requirements to conduct fair housing planning. The City of New Bedford has conducted this Analysis of Impediments recognizing that fair housing is more than preventing discrimination against individuals.



Fair housing barriers exist when people cannot live in the neighborhood or home of their choice because they represent a protected class.

Many factors contribute to one’s ability to have housing options that allow one to grow and thrive freely in their neighborhood environments. Therefore, this document embraces that spirit and looks to assess access to housing from multiple dimensions.

The City of New Bedford also commits to taking meaningful and measurable actions to break down barriers to fair housing choice and affirmatively further fair housing throughout the City for all protected classes. Section 14 of this document describes the specific actions the City will take to do so.

METHODOLOGY

The City of New Bedford and its consultants used a multi-dimensional approach to research and develop this Analysis of Impediments. This analysis relies on data from several sources, general community input, and targeted input from advocates, lenders, service providers, and developers. The region is fortunate to have local organizations such as SouthCoast Health and the UMASS Public Policy Center. It benefits from various studies and social research conducted and disseminated by these institutions; these reports further enhance the research conducted for this analysis. The analysis is based on the historical context of the City and attempts to understand the fair housing challenges and opportunities present in the City of New Bedford within both the jurisdictional and regional context.

AI Data Sources
<ul style="list-style-type: none">• US Decennial Census, 2010• American Community Survey, 2013-2017• HUD Data and Mapping Tool (AFFH-T)• U. S. Department of Housing and Urban Development• Home Mortgage Disclosure Act• Massachusetts Commission Against Discrimination (MCAD)• UMASS Public Policy Center• SouthCoast Health• SouthCoast Fair Housing• Newspaper Articles• City of New Bedford Consolidated Plan Survey 2020• Brown University• Other sources from BPG

Focus Groups

The Office of Housing and Community Development held several focus groups to inform the AI. Some of these focus groups were designed to provide input to both the Consolidated Plan and the AI. The City held one focus group specifically to inform the AI, inviting housing advocates, service providers, lenders, the New Bedford Housing Authority, and others. Below is the list of the focus groups held:

- **Housing Focus Group, November 20, 2019**
- **Economic Development Focus Group, November 20, 2019**
- **Youth Focus Group, November 21, 2019**
- **Homelessness Focus Group, November 21, 2019**
- **Analysis of Impediments Focus Group, February 4, 2020**

Resident Survey

In addition to holding focus groups to capture community input, the City surveyed New Bedford residents and people who work in New Bedford in January 2020. Surveys were available online and in print at key locations throughout the City and were distributed through schools. Respondents could take the survey in English, Spanish, or Portuguese. The City received 326 survey responses. Ninety-seven respondents were immigrants from outside the United States. Below is a breakdown of respondent demographics.

Sex	
Male	69
Female	214

Household Size	
1 person	15
2-3 people	96
4-6 people	154
7-9 people10+ people	16
10+ people	2

Race/Ethnicity			
Latino, Latina, Spanish Origin	140	Native Hawaiian or Other Pacific Islander	2
American Indian or Alaska Native	12	White	119
Asian	1	Another Race	48

Thoughts about your neighborhood

How would you rate the following public facilities and services?

	Good	Avg.	Poor	
Public transportation				
Street drainage				
Road/sidewalk conditions				
Code enforcement (buildings)				
Park maintenance				
Park/Playground conditions				
Tree planting, landscaping, beautification				
Street lighting				
Emergency services (police/fire/emerg. medical)				
Community/Senior Centers				

Housing

If you have moved in the past five years, did you move for any of the following reasons? Check all that apply.

- ☐ Rent increased
☐ Mortgage and/or property tax increased
☐ Home/rental insurance cost increased
☐ Evicted by the landlord
☐ Landlord no longer accepted rental assistance or vouchers (i.e. Section 8)
☐ Faced harassment from the landlord (for example, verbal or physical threats, entering unit without warning, shutting off utilities)
☐ I moved voluntarily
☐ I would rather not say
☐ Something else. Please specify:

Did you have any of the following problems when you looked for housing? Check all that apply.

- ☐ Having enough money for rent or mortgage payments
☐ Having enough money for a rental deposit or down-payment
☐ Finding a home that is accessible to someone with a physical disability (i.e. wheelchair accessible)
☐ Finding a home that is in good condition
☐ Finding a home that is close to my job
☐ Finding a home near goods and services, (e.g., stores, banks, etc.)
☐ Finding a home with access to public transportation
☐ Finding a home in an area I consider to be safe
☐ Finding a home that is large enough for my household
☐ Finding a home with my credit history or credit score
☐ Getting approved for a rental unit or mortgage loan
☐ Being shown housing in the neighborhood(s) I wanted to move to
☐ Dealing with past evictions, bankruptcies, and/or foreclosures
☐ Dealing with a criminal record
☐ I did not have any problems looking for housing
☐ Something else. Please specify:

Housing Discrimination

Have you or someone you know experienced housing discrimination in the New Bedford area in the past 5 years?

- ☐ Yes
☐ No

On what basis do you believe you were discriminated against in housing? Select all that apply.

- ☐ Race
☐ Ethnicity
☐ Color
☐ Religion
☐ Disability
☐ From a country outside of the United States
☐ Sex
☐ Sexual Orientation
☐ Gender Identity
☐ Presence of children in household
☐ Age
☐ Veteran Status
☐ Retaliation
☐ Other (please specify):

Analysis of Impediments Focus Group

On February 4, 2020, the Office of Housing and Community Development hosted a focus group with local advocates, housing and service providers, and lenders to gather their input on fair housing issues in New Bedford. Eighteen people attended the focus group. During the course of the discussion, participants responded to the following questions:

- What parts of New Bedford are generally seen as desirable places to live? What makes them attractive places to live? What barriers might someone face in moving to one of these areas?
- Are people in New Bedford segregated in where they live? How are they segregated: by race, ethnicity, religion? What causes this segregation to occur?
- Are you aware of any housing discrimination against certain populations in New Bedford?
- How is this discrimination manifested?
- Do you feel like New Bedford residents are educated about their rights regarding fair housing? Do they/service providers assisting them know where/how to report when they feel like they may have been discriminated against?
- What are the greatest fair housing or affordable housing needs in the community?
- How has recent growth in the housing market affected these needs? Are there particular populations that are particularly affected?
- How do you think fair housing issues will be impacted by the extension of the commuter rail into New Bedford? Are there certain populations that will be particularly affected?

Organizations Represented in Focus Groups

- New Bedford Housing Authority
 - Bristol County Savings Bank
 - New Bedford Dept. of Community Services
 - The Public Policy Center at UMASS Dartmouth
 - Southeast Center for Independent Living
 - New Bedford Housing Authority
 - Inter-Church Council of Greater New Bedford
 - Office of Housing and Community Development
 - Homeless Service Provider Network
 - People Acting in Community Endeavors
 - Veterans Transition House
 - Immigrants Assistance Center
 - Steppingstone
 - First Citizen’s Federal Credit Union
 - South Coastal Counties Legal Services
 - PAACA
 - MassHousing
 - South Coast Fair Housing
- What, if any, municipal policies, procedures or actions are inadvertently leading to unequal access to housing opportunities in New Bedford?
 - Are there certain populations who may want to move out of New Bedford to surrounding towns who cannot do so, e.g., people of color, people with disabilities, people with housing vouchers? What barriers do they face?
 - Is there anything we haven’t discussed that you feel is important to our research?

AI Interviews

Several one-on-one interviews were conducted to inform the AI. Representatives from the following organizations participated in the one-on-one interviews:

- SouthCoast Fair Housing
- PACE
- South Coastal Counties Legal Services
- Realtor Association of Southeastern Massachusetts
- United Way Family Resource Center
- Lanagan & Co. Inc.

Interviewees were asked similar questions to those presented during the AI Focus Group. Because of the nature of the discussion being 1-1, the interviewer could probe more deeply on these issues with the interviewee. The questions and interview summaries are located in the Appendix.

2.0 What is Fair Housing?

Before exploring the local and regional conditions that provide opportunities for and contribute to fair housing barriers, it is important to set a common understanding of what is meant by fair housing. It may be easiest to think about fair housing from one’s understanding of the things one looks for in a home. When asked this question, people often respond with a list of desired features: good schools, friendly neighbors, easy access to work, parks and open space, amenities such as grocery stores and banks. In fact, the list is almost universal, no matter one’s background or membership in a “protected class.” The idea of fair housing is that people can live wherever they choose and access their desired features within their economic means, that there are housing options for them in these locations, and barriers, other than money, do not exist that prevent them from living in those desired locations.

When people do not have access to fair housing, they may face barriers that take shape in different forms. They may experience personal discrimination, for example, in the form of a landlord that refuses to rent or show an apartment to a family with children, or systemic barriers, such as the lack of affordable rental units in predominantly wealthy, White communities. Both public and private practices have contributed to the segregated living patterns many communities experience today. They include:

- **Redlining**
- **Blockbusting/Steering**
- **Segregated Public Housing**
- **Government Policies**
- **Discriminatory Advertising**
- **Restricted Deeds/Covenant**
- **Discriminatory Lending**
- **Zoning Restrictions**
- **Community Opposition/Nimbyism**
- **Systemic Racism**
- **Institutional Racism**

While people might like to think that these practices no longer occur, this is not true. Some are still common, and others are less apparent but are revealed through fair housing testing.

Fair housing issues often overlap with general community development concerns, such as affordable housing and community investment. Fair housing issues can be distinguished by their relationship to protected classes. For example, there may be a concern that people with low incomes cannot afford homes in a community. That may be a legitimate community concern, but not necessarily a fair housing issue. However, if a community deliberately sets zoning policy to inflate housing costs to keep out people of a certain race or ethnicity (protected classes) who tend to have lower incomes than Whites, that would be a fair housing issue. In short, if the reason there is a housing issue that infringes upon someone *because* they fall within a protected class, then it is a fair housing issue

This Analysis of Impediments considers all these protected classes in its analysis. The federal Fair Housing Act prevents discrimination in housing based on seven protected classes:

- **Race**
- **Color**
- **National Origin**
- **Religion**
- **Sex**
- **Disability**

The Commonwealth of Massachusetts and the City of New Bedford build on the federally protected classes and makes it illegal to discriminate in housing on the basis of:

- **Source of Income (e.g., a Section 8 voucher)**
- **Sexual Orientation**
- **Gender Identity**
- **Age**
- **Marital Status**
- **Veteran or Active Military Status**
- **Genetic Information**

3.0 Key Findings

The key findings listed within this section inform the Analysis of Impediments to Fair Housing identified by the City and the goals and strategies the City plans to undertake to address them.

- New Bedford's demographics are changing. The most predominate changes to the city's population has been to the racial and ethnic composition of the population. In the past twenty years minority populations in New Bedford have increased significantly. From 2000 to 20017, there was a 19.5% increase in the Hispanic population. People of color comprise an increasing percentage of the overall population, while white residents are decreasing. Over fifteen percent (15) of New Bedford's population is comprised of people of color. The surrounding towns are home to a primarily white population with higher incomes, indicating regional-level segregation that may be the result of direct or indirect discrimination.
- Income disparity. Data from HUD's Comprehensive Housing Affordability Strategy (CHAS) (2011 -2015), estimates that there are approximately 39,140 households in New Bedford. Of these households, approximately 35 percent earn less than 50 percent of the area median income (AMI). Approximately 53 percent of households in New Bedford earn less than 80 percent of AMI.
- There are several areas of concentrations of public housing and low-income populations in New Bedford. These areas have the lowest incomes and a high proportion of people of color - these areas are considered Racially and Ethnically Concentrated Areas of Poverty (RECAPs).
- Housing cost burden is a major issue surrounding maintenance of quality housing. The lack of safe, decent housing that is affordable to New Bedford individuals and families, particularly those at or below 80% AMI, is well documented. The older housing stock and deferred maintenance on the part of some property owners sometimes create substandard housing conditions for poor renters.
- Families, households with housing vouchers, and people of color often experience challenges when looking for safe affordable housing.



- People with disabilities have difficulty finding housing in New Bedford due to the housing stock's physical features and inherent difficulties regarding handicap accessible modifications to existing housing.



- There are high concentrations of subsidized and publicly supported housing in New Bedford compared to the region. Approximately twelve (12) percent of New Bedford's housing stock is determined to be subsidized by the State Department of Housing and Community Development, which is substantially higher than contiguous towns.
- New Bedford has experienced an annual increase in the median home prices and exponential increase in market rate rents that have exceeded gains in income. Historically, in New Bedford the Fair Market rent rates were similar to market rate rent levels and now we are seeing the market rate unit rents significantly higher than FMRs, creating an additional challenge on low- and moderate-income renters.

- Home Mortgage Disclosure Act (HMDA) data show significant disparities in loan denials across certain races and ethnicities. Also, Hispanics are less likely to apply for loans than other groups, which leads to questions about general access to homeownership for people of Hispanic origin.
- With the commuter rail extension to New Bedford, the City has the potential demand for additional housing. The importance of developing diverse housing that is attractive to all incomes is equally important.

4.0 Assessment of Past Goals & Actions

New Bedford last conducted an Analysis of Impediments in 2005. The following are the impediments and actions the City proposed to take from that plan.

Impediment	Action Steps	Progress
Poverty: The prevalence of poverty in the City of New Bedford affects the entire community and disproportionately affects minority populations.	<ul style="list-style-type: none">• Work to develop effective public policy that supports and builds up the capacity and opportunities of those who live in poverty.• Undertake employment strategies that help people in poverty attain self-sufficiency, including the expansion of job availability of low-income persons through enforcement of the Section 3 initiative, and assisting low and moderate-income persons in the development of micro-enterprise businesses.• Support housing strategies that help those in poverty move into self-sufficiency, including the continued development of safe, decent and affordable housing.	<ul style="list-style-type: none">• The City offers low-interest financing to assist homeowners and landlords in repairing their homes to provide safe, decent, affordable housing.• The City dedicates significant resources to the New Bedford Economic Development Council to promote economic development and expansion of existing business leading to the direct creation and/or retention of jobs with over 51% targeted to low- and moderate-income persons.• The City administers a highly effective Continuum of Care, through the local Housing Service Providers Network and receives over \$1.8 million annually to combat homeless and target homeless persons and families for placement in Permanent Supportive Housing.
Qualifying for Financing: There is an inability of families and individuals to qualify for mortgages.	<ul style="list-style-type: none">• Encourage local professional associations (real estate agents, lenders, apartment owners, and homebuilders) to promote housing choice through special advertising and outreach programs.• Reinforce fair housing training to lenders to educate them on individual responsibilities under the Fair Housing Act.	<ul style="list-style-type: none">• The City, in collaboration with local lenders, social service agencies and MassHousing, has formed the Fall River/New Bedford Housing Partnership. The Partnership has offered credit workshops, “Meet the Lender” workshops and housing fairs. The Partnership also established a MassHousing mortgage product, “Buy New Bedford,” that provided flexible underwriting and has low downpayment requirements.

<p>Locational Discrimination: Although minorities live throughout the City of New Bedford, the 2000 U.S. Census indicates that these populations tend to be concentrated within census tracts characterized by lower incomes and higher crime rates.</p>	<ul style="list-style-type: none"> • Undertake programs, projects and initiatives that support the deconcentration of poverty in the City. • Increase affordability and access to affordable rental units and homeownership opportunities in all City census tracts. • Provide additional fair housing education programs and opportunities through community-wide educational events in concert with the Massachusetts Commission on Discrimination and the City’s Office of Housing and Community Development (OHCD) to help residents develop an increased understanding of their rights under the law. • Continued targeting of South Central, Cove Street, Acushnet Heights and other distressed, blighted, highly concentrated minority neighborhoods in an effort to build awareness and develop substantive policy that would revitalize and stabilize these neighborhoods. 	<ul style="list-style-type: none"> • The City has increased access to affordable housing throughout the city in all neighborhoods by supporting and funding affordable housing developments in all census tracts throughout the city. • The City’s Neighborhood’s First Homeownership Program has initiated the redevelopment of vacant properties throughout the city into homeownership opportunities. • The City, has consistently funded several advocacy organizations, including South Coast Fair Housing and South Coastal Counties Legal Services that provide support, legal and financial services to persons experiencing discriminatory housing actions.
<p>Discrimination and Private Sector: Loan origination rates for minority applicants are far below community averages.</p>	<ul style="list-style-type: none"> • Increase education about fair housing rights to potential applicants seeking home purchase loans, refinancing/ equity loans or second mortgage loans, and potential tenants. • Increase education to private sector mortgage lenders, realtors, etc. by reinforcing professional standards and fair housing education through new and existing programs (e.g., lender orientation breakfast). 	<ul style="list-style-type: none"> • The City offers a comprehensive eight hour first-time homebuyer seminar that encompasses a detailed overview of the process of purchasing a home. The five annual seminars attract over 250 participants.
<p>Public Sector Actions and Inactions: Public policy and regulatory actions—or the lack thereof—can often impede access to fair housing by diminishing opportunities for affordable housing/rental development and retention.</p>	<ul style="list-style-type: none"> • Review and update municipal regulations and City policies to promote housing affordability. • Evaluate the effectiveness of waiving any permit fees and/or impact fees for housing affordable to low and moderate-income households. • Educate the community, stakeholders and policymakers as to the value of encouraging and retaining affordable housing in New Bedford. • Continue to develop strategies that allow for and encourage mixed-use development within the downtown business district. 	<ul style="list-style-type: none"> • The City, through its OHCD, continues to provide information, access to programs, ongoing marketing of affordable housing programs and initiatives to underserved populations. • Ongoing education through seminars, focus groups, community engagement and promotional materials on the City website all help to the community has access to information and resources to access affordable housing.

<p>Accessibility Costs: There are prohibitive costs involved in retrofitting the housing for handicapped accessibility.</p>	<ul style="list-style-type: none"> • Provide technical assistance through the OHCD to assist local organizations in accessing public funding sources. • Continue using CDBG funding for eligible public facilities projects that meet national objectives and provide greater accessibility to public buildings in the City. • Continue the Handicap Accessibility Grant Program for privately- owned dwellings 	<ul style="list-style-type: none"> • OHCD continues to offer a Storefront Reimbursement Grant Program that provides a grant for signage and awnings to eligible business storefronts. • OHCD has continued to use funding to provide greater accessibility to public buildings within the City. • OHCD offers a Handicapped Accessibility Grant Program, which provides funding for accessibility improvements in privately-owned dwelling units.
<p>Minority Representation on City: There is a lack of minority representation on the City of New Bedford’s boards, particularly its Planning and Zoning Boards.</p>	<ul style="list-style-type: none"> • Continue to seek out and recruit qualified minority candidates to fill future openings on all City boards, particularly those entities responsible for land use policy, housing, planning and human rights to represent the face of New Bedford more closely in regulatory and policy-based positions. 	<ul style="list-style-type: none"> • The City continues to make efforts for inclusion of maximum diversity of local boards and commissions that have jurisdiction on housing policy and decision making.
<p>Lead Paint: Because most of the City of New Bedford’s housing stock predates 1950— particularly in the South and South Central regions (tracts 6519, 6526, and 6527)—the incidence of lead-based paint is very high. This statistic, coupled with the prevalence of absentee landlords in those particular neighborhoods who, for either economic or other reasons, opt not to have their houses deleaded, equals a large number of substandard housing units requiring lead abatement.</p>	<ul style="list-style-type: none"> • Increase public awareness of the OHCD’s Lead Paint Reimbursement program and the Massachusetts Housing Finance Agency (MHFA)’s “Get the Lead Out Program” for lead paint abatement. “Get the Lead Out, “provides up to 50% of the approved cost of deleading up to a maximum of \$2,500 per unit through brochures, cable notices and advertisements. • Pursue funding at the state and federal levels to maintain and possibly increase availability of these programs so that the City of New Bedford may continue to offer financial and technical assistance to landlords and property owners who wish to delead their homes and apartments. 	<ul style="list-style-type: none"> • The City continues to provide Lead Paint Reimbursement grants to property owners who live in or rent their properties to income-eligible families and delead their properties. • The City is also the Local Rehabilitation Agency (LRA) for the MassHousing “Get the Lead Out” Program. • In 2021, the City received a Lead Hazard Control and Healthy Homes Grant to address ongoing issues with lead-based paint in residential properties.
<p>Blighted, Abandoned or Vacant Properties: There are abandoned buildings and vacant lots in blighted City neighborhoods, disproportionately affecting areas with higher concentrations of minority residents.</p>	<ul style="list-style-type: none"> • Continue work with the Mayor’s Housing Task Force in developing a Vacant Lots and Abandoned Buildings Strategy for the City of New Bedford. • Inventory and monitor properties Citywide that could fall either within the abandoned buildings category or that has ongoing, undressed fire and building code violations. • Collaborate with the Attorney General’s Office in the combined effort to engage in the Receivership Program, thereby creating the means for an 	<ul style="list-style-type: none"> • The City maintains a Vacant Building Registry that identifies abandoned property throughout the City. • The City has worked with a software company to create an assessment tool that identifies potentially vacant buildings in the City. • The City administers, along with the Attorney General's office, a highly successful Receivership

	<p>appointment of receivers by the state courts to undertake and oversee the rehabilitation of residential properties with persistent, unremedied code violations.</p> <ul style="list-style-type: none">• Fund and undertake a demolition program in the City targeting those residential properties that contravene the Massachusetts Building Code; update, target and pursue tax title properties.	<p>Program that targets vacant and abandoned properties and connects them with a slate of receivers to address code violations in abandoned housing throughout the City.</p>
<p>Limited Public Awareness and Education: Based on survey results tabulated as part of the Analysis of Impediments to Fair Housing, there is a significant gap in the general public’s understanding of Fair Housing regulations and the financing options and assistance available.</p>	<ul style="list-style-type: none">• Undertake a public education campaign regarding Fair Housing regulations and remedies that explicitly target low/moderate-income households, those with disabilities, or those who might otherwise be left outside of traditional assistance venues.• Designate a City staff person that could be available to the Greater New Bedford Board of Realtors as a resource person/technical assistance liaison for the real estate community to provide ongoing literature and information about housing programs available to the community. Introduce fair housing and financial housing program assistance materials to individuals and families moving through the Continuum of Care through Homeless Service Providers Network meetings and resource materials maintained by the OHCD.• Increase recognition of Fair Housing Month with a Citywide outreach effort into all sectors of the population.	<ul style="list-style-type: none">• The City continues to form partnerships with the local landlord association and offer advantageous programs to assist landlords in fixing up their properties and renting them to low-income tenants.• The City also has worked with the Attorney General’s office on their Receivership Program and works with local receivers to identify and improve problem properties.• Financial Assistance information, financial literacy programming and fair housing presentations have been regularly provided to the Fall River/New Bedford Housing Partnership and the Continuum of Care through its Homeless Service Provider Network.• Financial Assistance information, financial literacy programming, and fair housing presentations have each been provided on a regular basis to the Continuum of Care through its Homeless Service Provider’s Network.
<p>Banking Outreach to Minorities: There has been a failure of some banks to market their lending services to minorities, thus compromising the banking industry’s ability to reach these marginalized groups adequately.</p>	<ul style="list-style-type: none">• Host a meeting between City officials and local banking officials to review their marketing plan for reaching minorities.• Encourage local banks to undertake an aggressive marketing campaign for reaching minority applicants.• Consider meetings with those banks that are not investing in certain New Bedford census tracts (those that correlate with high minority and low-income	<ul style="list-style-type: none">• The City continues to work with the Fall River/ New Bedford Housing Partnership, local lenders, the Realtor Association and the New Bedford Housing Authority to provide information and spread the word regarding affordable housing programs and opportunities, including lotteries and educational seminars to assist those that may be traditionally left

	<p>populations) to solicit a commitment from them to reinvest in these targeted neighborhoods.</p> <ul style="list-style-type: none">• Fortify new commitments to reinvest through a community- banking partnership where local banks make specific minimum commitments to lending in underserved neighborhoods.	<p>out or least likely to apply. The City also continues to work with the Massachusetts Housing Partnership’s “ONE Program.”</p>
<p>Landlord Issues: At times, potential tenants and service providers placing individuals and families who are moving through the City’s Continuum of Care, have experienced difficulty obtaining permanent rental housing because of landlord resistance to accepting tenancy.</p>	<ul style="list-style-type: none">• Develop a voluntary strategy regarding tenant acceptance following a collaborative meeting between City officials and local landlord groups to review their tenant application and screening requirements.• Continue work between service providers in the Homeless Service Provider’s Network and landlords of federally funded units in addressing how clients with poor CORI checks can secure safe, affordable housing.	<ul style="list-style-type: none">• Homeless Service Provider’s Network members continue outreach to landlords to mitigate barriers in accepting tenants and ensure stable tenancies.

5.0 Demographics

New Bedford, Massachusetts’s sixth-largest City, is home to roughly 95,125 people from diverse backgrounds, particularly people of Portuguese descent. In the nineteenth century, New Bedford was a one of the nation’s most important whaling centers. The Quaker’s role in the whaling industry combined with their willingness to employ people from all backgrounds drew many from the Azores and Cape Verde to work in the industry. The City’s long history in the fishing industry continues to draw people from other parts of the world to work on its ships, in its processing plants, and in other supporting industries.

The City’s total population has not changed substantially since 2000; however, there have been shifts in the racial and ethnic identity of its residents. In 2000, just under 16,000 residents identified as Hispanic or Latino. By 2017, this number had grown almost 20%, to over 19,000 people.

Table 5.1.1: 2000-2017 Total Population			
	New Bedford	Bristol County	Massachusetts
2000	95,072	548,285	6,547,629
2017	95,125	557,016	6,789,319
% change	0.1%	1.6%	3.7%

Source: 2010 Decennial Census SF1, P4; 2017 ACS B0300

During this same period, the White population declined almost 10% and the number of Black/African American residents declined 4%. Data shows that the Asian population grew by over 70% while the American Indian/Alaska Native population dropped by almost 80%. These large fluctuations may be attributable to changes in race classifications used by the Census Bureau, rather than in- and out- migrations.

Table 5.1.2: 2000-2017 Population by Race				
		New Bedford	Bristol County	Massachusetts
American Indian/Alaska Native Alone	2000	1,220	2,120	18,850
	2017	256	469	14,336
	% change	-79.0%	-77.9%	-23.9%
Asian Alone	2000	893	10,242	349,768
	2017	1,533	12,241	426,225
	% change	71.7%	19.5%	21.9%
Black/African-American Alone	2000	6,083	17,832	434,398
	2017	5,829	21,325	499,774
	% change	-4.2%	19.6%	15.0%
Native Hawaiian/Other Pacific Islander Alone	2000	50	205	2,223
	2017	17	296	2,253
	% change	-66.0%	44.4%	1.3%
White Alone	2000	70,799	484,794	5,265,236
	2017	63,899	475,322	5,358,373
	% change	-9.7%	-2.0%	1.8%
Some Other Race Alone	2000	10,631	18,682	305,151
	2017	19,756	31,111	278,835
	% change	85.8%	66.5%	-8.6%
Two or More Races	2000	5,396	14,410	172,003
	2017	3,835	16,252	209,523
	% change	-28.9%	12.8%	21.8%

Source: 2010 Decennial Census PL, P1; 2017 ACS B02001

Table 5.1.3: 2000-2017 Population by Ethnicity

		New Bedford	Bristol County	Massachusetts
Hispanic or Latino	2000	15,916	33,020	627,654
	2017	19,015	40,913	760,177
	% change	19.5%	23.9%	21.1%
Not Hispanic or Latino	2000	79,156	515,265	5,919,975
	2017	76,110	516,103	6,029,142
	% change	-3.8%	0.2%	1.8%
Total Population Change	2000	95,072	548,285	6,547,629
	2017	95,125	557,016	6,789,319
	% change	0.1%	1.6%	3.7%

Source: 2010 Decennial Census SF1, P4; 2017 ACS B03003

IMMIGRATION FROM CENTRAL AMERICA

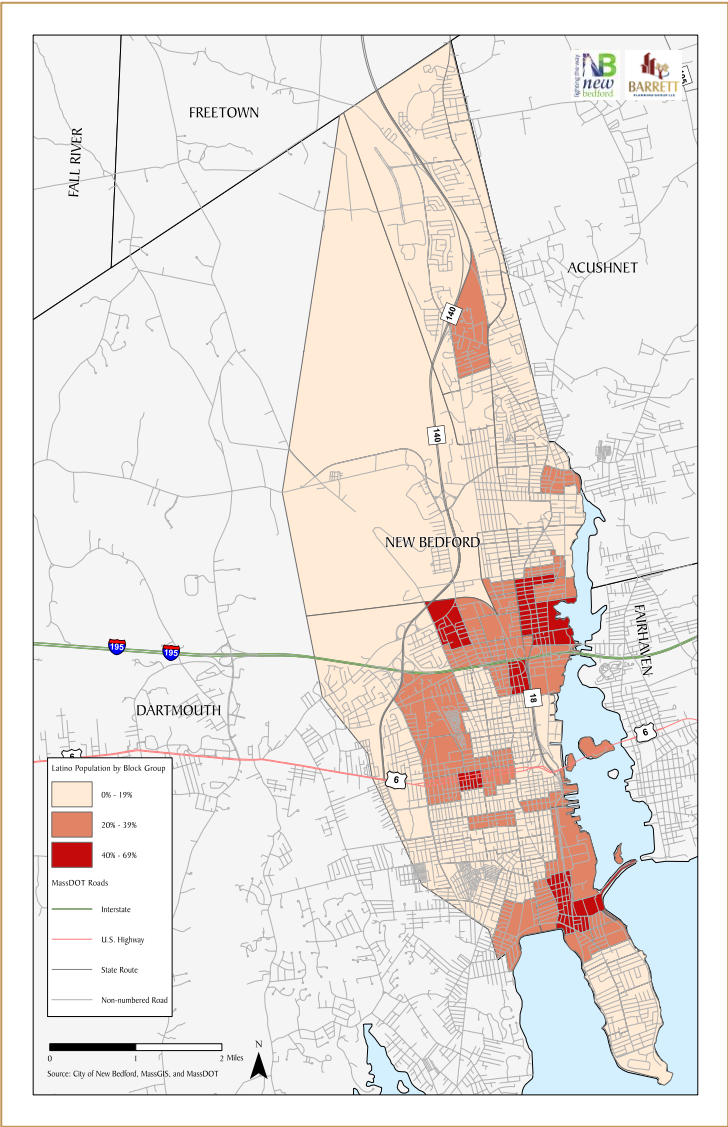
The majority of New Bedford's Hispanic population identifies as Puerto Rican, with over 10,500 people in that group.¹ In addition to a large Puerto Rican population, many of the City's immigrants come from Latin America, including Mexico, Guatemala, Honduras, and El Salvador. Mayans make up many of the City's undocumented immigrants. The UMASS Public Policy Center estimates that there are 2,952 undocumented immigrants in the City, and there are 4,048 Maya in New Bedford, though depending on different variables, estimates range from 2,400 to 7,000.² Since the ACS does not collect information on Maya ancestry, these estimates are based on Hispanic persons' national origin, as reported in the ACS.

Undocumented immigrants occupy many of the City's low-paying, high-risk jobs, such as fish processing and textile manufacturing. Reports from advocates indicate that members of this population are likely to experience unsafe working and housing conditions.³ For many, their undocumented status prevents them from filing complaints or speaking out against exploitation. In 2007, Immigration and Customs Enforcement (ICE) raided the Michael Bianco leather factory, arresting 361 employees and deporting over 100 employees. Today, anti-

1 Mattos, McCarthy, and Borges, "Research Brief: Estimating the Size of the Mayan Population in New Bedford, Massachusetts," UMASS Public Policy Center (July 2016): 1-2.

Map 1: Latino Population by Block Group

immigrant sentiment in the general population further discourages people from voicing concerns or complaints about housing conditions. This group often lives in poor quality, unsafe housing, exploited by landlords seeking to rent apartments at the uppermost limits they can charge without making repairs or completing maintenance on their properties. With several thousand undocumented immigrants residing and working in New Bedford, there are numerous opportunities for negligent and absentee landlords to find occupants for their units.



2 Mattos, McCarthy, and Borges, "Estimating the Size of the Maya Population," 3-4.
3 Ibid., 1.

PEOPLE WITH DISABILITIES

Over 14,500 people living in New Bedford have some type of disability,⁴ including physical and cognitive/developmental. These people represent over 15% of the City’s population. Approximately 8% of people with disabilities are under 18 years of age, 14% are between 18 and 34 years of age, 43% are between 35-64 years of age, and 35% are over 65 years of age.⁵

As shown in Table 5.3.1, ambulatory disabilities are the most common disability in New Bedford, at 24 percent. Disabilities of this nature are the most prevalent in the county and the Commonwealth. Twenty-three percent of the City’s disabled population suffers from a cognitive disability, meaning they experience difficulty remembering, concentrating, or making decisions. Ambulatory and cognitive issues can strongly affect a person’s ability to secure housing and remain stably housed.

Table 5.3.1: People with Disabilities			
	New Bedford	Bristol County	Massachusetts
Hearing	3,585	22,229	223,425
Vision	2,148	11,573	129,817
Cognitive	6,824	33,236	317,684
Ambulatory	7,304	37,476	376,868
Self-Care	3,693	15,781	157,882
Independent Living	6,286	28,239	285,325

Source: 2017 ACS S1810.

HOUSEHOLD COMPOSITION

New Bedford has 39,491 households. The majority of these are family households, however the City also has a sizeable number of nonfamily households (40.1%).

⁴ The U.S Census Bureau separates disabilities into six main types: hearing, vision, cognitive, ambulatory, self-care, and independent living. An ambulatory disability is having serious difficulty walking or climbing stairs. A cognitive disability

Table 5.4.1: Households by Type			
Households	New Bedford	Bristol County	Massachusetts
Family Households	23,319	142,267	1,647,619
Non-family Households	16,172	73,636	938,096
Total Households	39,491	215,903	2,585,715

Source: 2017 ACS B11001

FAMILIES WITH CHILDREN

The majority of households with children under 18 years of age in New Bedford are family households, with most of these being female-headed households. Single women head approximately 46.6% of New Bedford’s family households. The second-largest type of family household is married couples or two-parent households—these households make up about 43.4% of all families in the City. Lastly, single, male-headed households comprise 9.9% of family households.

Table 5.5.1: Household Type for Children Under 18 Years				
		New Bedford	Bristol County	Massachusetts
Family Households (Hhlds)	Married Couple			
	Male Householder			
	- No Mate	8,985	74,449	943,714
	Female	2,054	7,383	83,610
	Householder - No Mate	9,657	33,416	340,689
	Total Family Hhlds	20,696	115,248	1,368,013
Non-family Households		336	1,191	8,313
Total Households		21,032	116,439	1,376,326

Source: 2017 ACS B09005

is having difficulty remembering, concentrating, or making decisions. A self-care difficulty is having difficulty bathing or dressing. An independent living difficulty is having difficulty doing basic tasks alone
5 2017 ACS S1810

HOUSEHOLD INCOME

Household and family incomes in New Bedford are significantly lower than those of Bristol County and the state. In 2017, the median household income for New Bedford residents was just over \$40,000 and family income was approximately \$51,500. This represents only 65% of the median incomes for Bristol County and just over half that of the Commonwealth’s median income.

Table 5.6.1: Median Household Income in the Past 12 Months			
	New Bedford	Bristol County	Massachusetts
Income*	\$40,626	\$62,514	\$74,167

*2017 inflation adjusted dollars
Source: 2017 ACS B19013

Table 5.6.2: Median Family Income in the Past 12 Months			
	New Bedford	Bristol County	Massachusetts
Income*	\$51,529	\$79,937	\$94,110

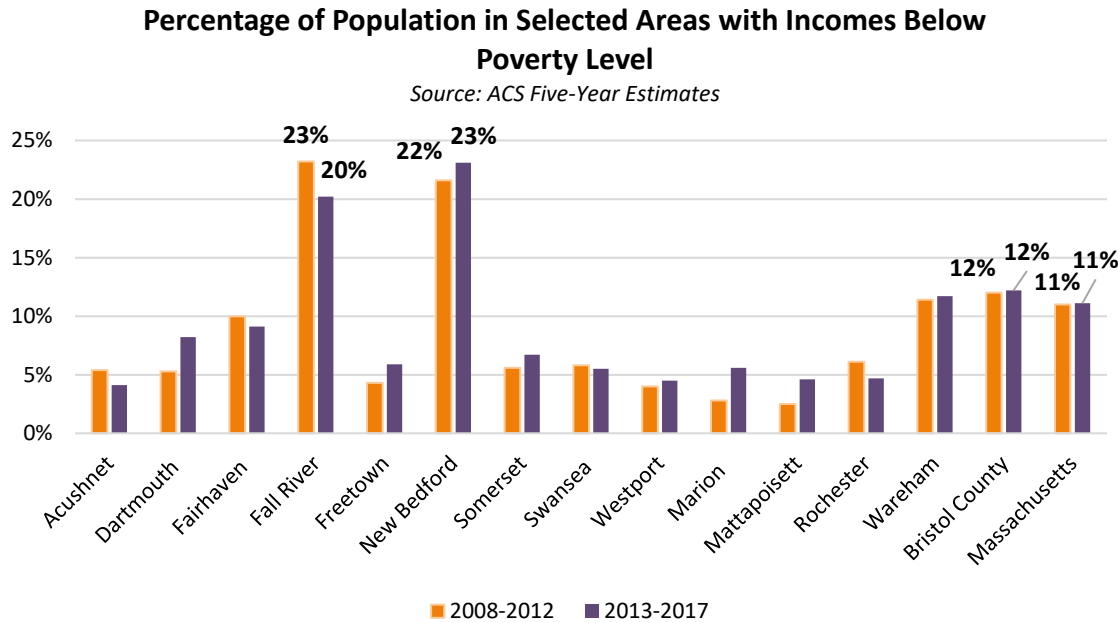
*2017 inflation adjusted dollars
Source: 2017 ACS B19113

REGIONAL DEMOGRAPHICS

The region around the City of New Bedford is generally suburban and rural. The South Coast is one of the state's agricultural regions with working farms that produce fruit and vegetables and raise livestock. Fall River, another South Coast city, lies to the west of New Bedford and shares a similar history rooted in textile manufacturing and immigration to support manufacturing jobs.

New Bedford lies within the Providence-Warwick core-based statistical area (CBSA), which includes the cities of Attleboro and Fall River in Massachusetts and almost the entire state of Rhode Island. For this analysis, the narrative defines the "region" as including the City of New Bedford and the surrounding towns of Acushnet, Dartmouth, Fairhaven, Freetown, Marion, Mattapoisett, Rochester, and Westport across the region except where otherwise noted.

As Maps 2 and 3 *White Population and Persons of Color* show, the region surrounding New Bedford is predominately White. The region's cities, including New Bedford, Fall River, Providence, and its suburbs, have the greatest populations of people of color. Map 3 indicates that there are sizeable Black, Hispanic, and Asian/Pacific Islander populations in these cities. The



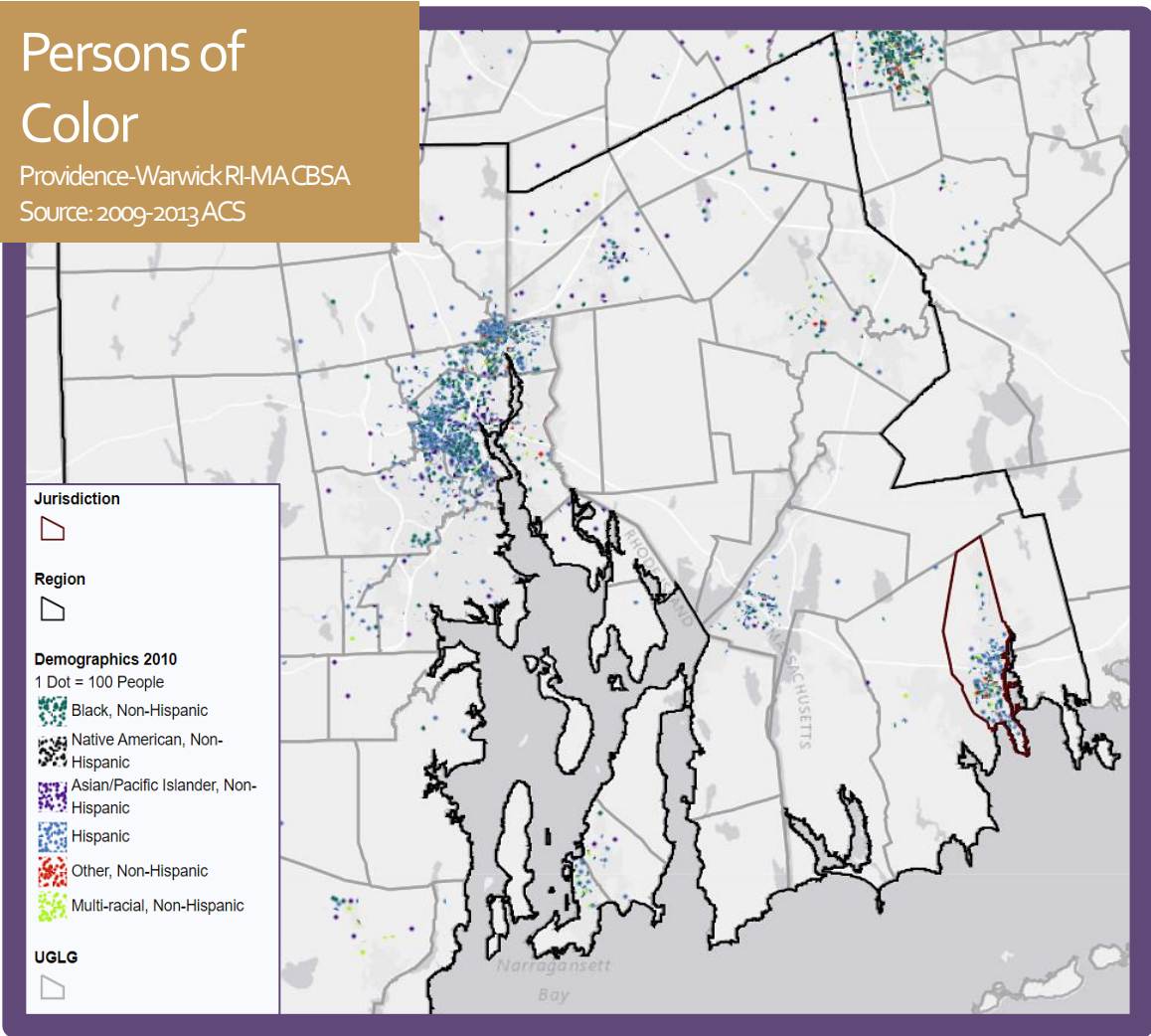
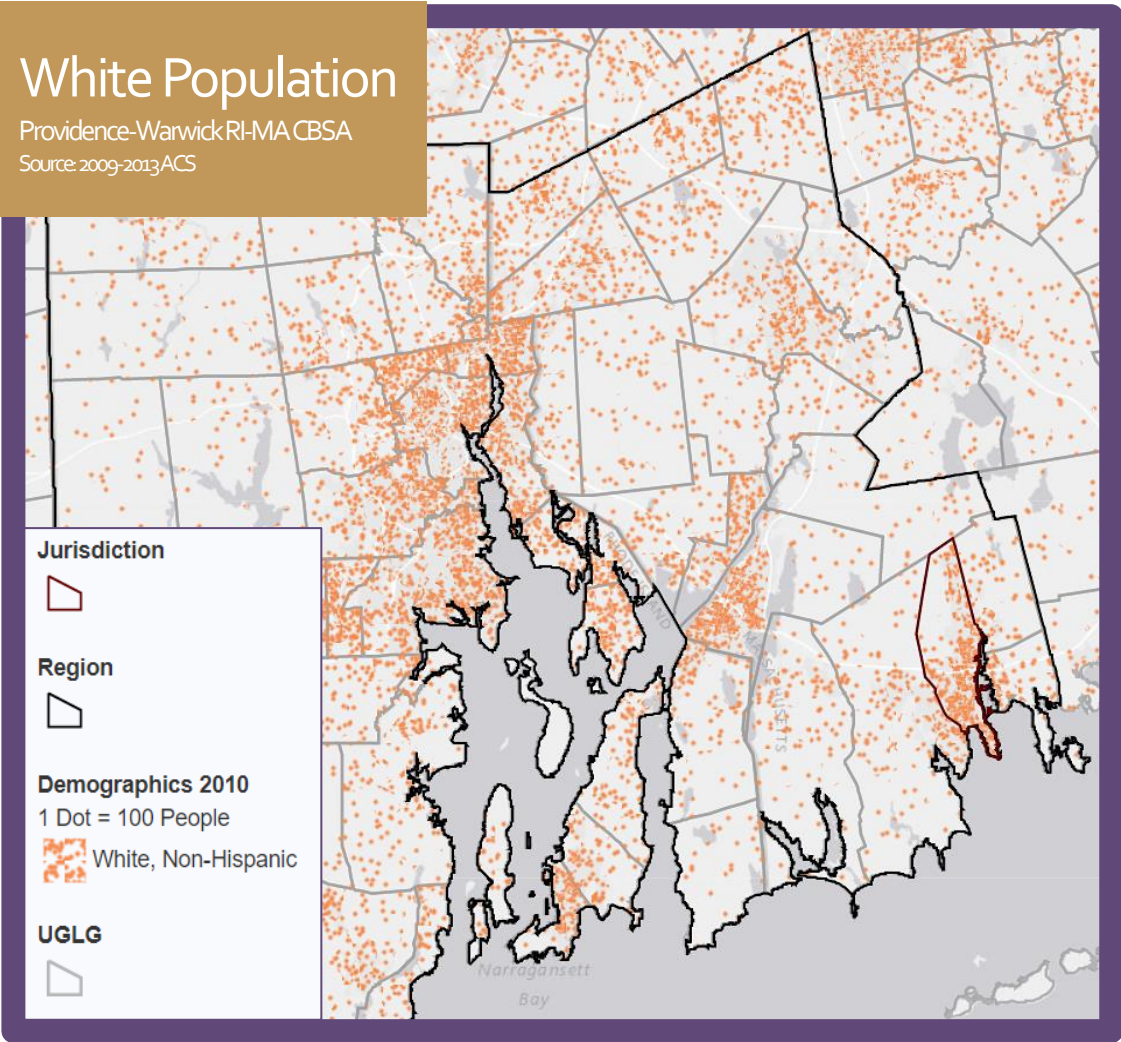
regional cities are also where there is a higher population density, indicated by the maps' dot density. As stated above, the region, in general, is relatively rural.

There are wealth differences across the region. People living in the cities tend to have lower incomes than residents living in non-urban areas. There are several particularly wealthy towns in the Greater New Bedford region. Table 5.7.1 lists the per capita income for each of the region's communities. Marion, Mattapoisett, and Rochester stand out with per capita incomes between \$20,000 and \$30,000 more than New Bedford's. New Bedford and Fall River also have the region's highest poverty rates among Massachusetts towns and cities. The graph shows that poverty rates in New Bedford have risen in recent years.

Table 5.7.1: Per Capita Income in the Past 12 Months	
Acushnet	\$32,422
Dartmouth	\$34,415
Fairhaven	\$33,268
Fall River	\$23,650
Freetown	\$36,581
New Bedford	\$23,866
Westport	\$38,236
Marion	\$51,781
Mattapoisett	\$53,412
Rochester	\$45,070

Source: 2017 ACS B19301

Maps 2: White Population and Map 3: Persons of Color



6.0 Racially & Ethnically Concentrated Areas of Poverty

HUD defines racially concentrated areas of poverty (RECAPs) as census tracts in which 50% or more of the people residing in the tract are people of color, AND more than 40% of them live below the poverty line. In 2000, there were no RECAP areas in New Bedford. By 2010, there were four located to the north, west, and south of downtown, as seen in Map 4.

There are high concentrations of people who have limited ability to speak English in these tracts, with most people speaking Spanish and French Creole. Immigrants coming to the region and settling in these areas have contributed to the concentrations of people of color in these tracts. These areas are also where some of the poorest housing conditions are. The prevalence of undocumented immigrants results in few complaints and limited code enforcement.

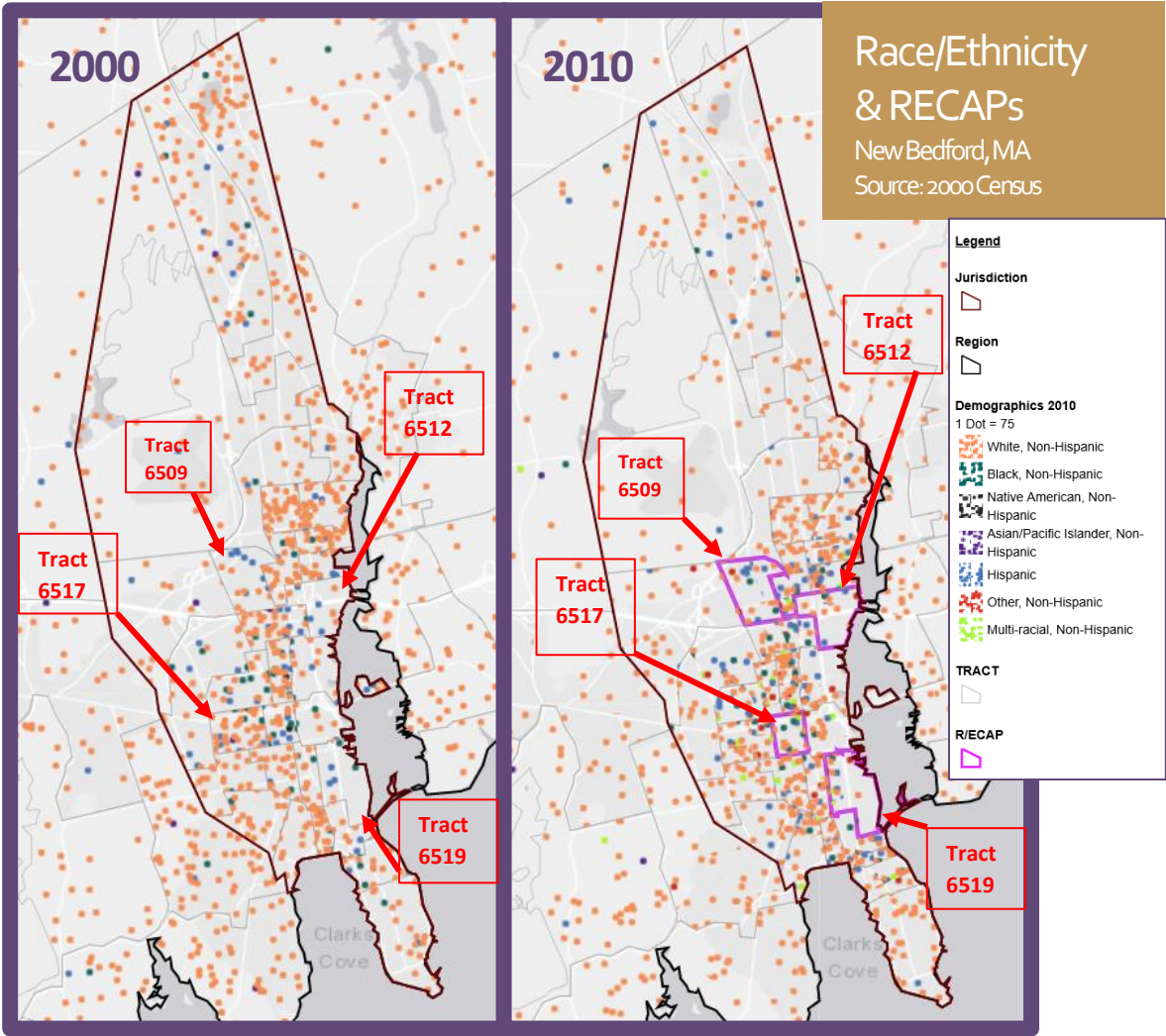
Table 6.1.1: RECAP Housing Characteristics		
Census Tract	Number	RECAP%
6509	1,153	53.8%
6512	964	73.4%
6517	1,159	58.2%
6519	899	62.6%

Source: 2017 ACS DP04

All but one of the RECAPs contain publicly supported housing, a combination of public housing, Low Income Housing Tax Credit (LIHTC) units, and Project-based Section 8 properties. The two RECAPs to the south also have a high percentage of voucher holders living there, with tract 6517 having 19.9% of units occupied by voucher holders and tract 6519 having 17.9% of units occupied by voucher holders.⁶

⁶ Tenant Rental Assistance Certification System (TRACS), 2016

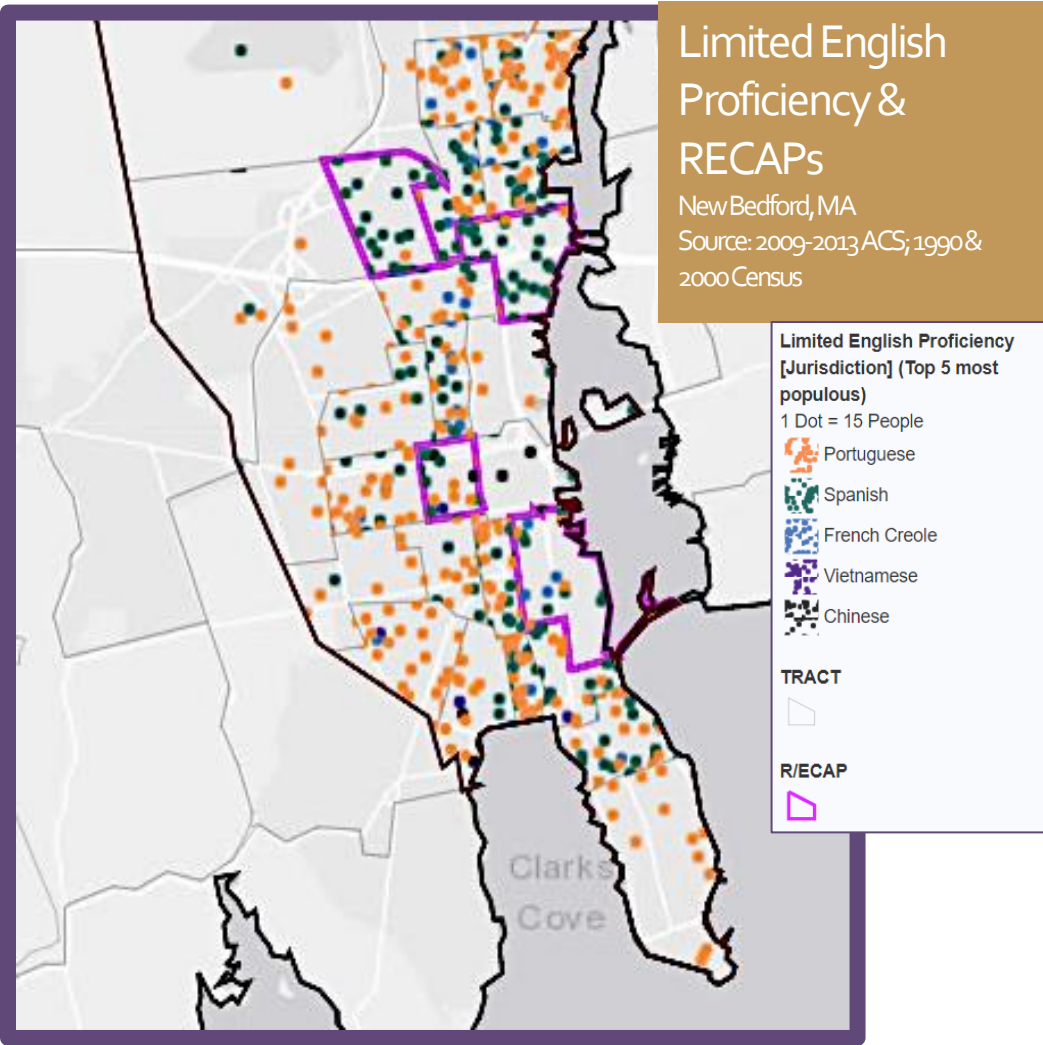
Map 4: Race/Ethnicity and RECAPs



Tract 6512, the only RECAP without public supported housing, is a predominantly industrial area with fish processing plants and marine-relate industries and few housing units. Route 195 runs through the middle of this RECAP. While tract 6519 does have some publicly supported housing in it, it has fewer housing units than the other RECAPs as there are also warehouses and other light industrial uses in this tract.

The average median housing value for owner-occupied units in these areas is \$19,950, 9.7% below the City's median housing value, and the median gross rent averages \$703 across the four RECAPs, \$100 less than the citywide median.⁷ There are five schools in and near these four census tracts, of which four are elementary schools. Comparing 2019 MCAS scores, their school performance varies compared to the rest of the City. The Whaling City Junior/Senior High School (tract 6517) had the lowest Next Generation MCAS Achievement Results in math and language arts. The Alfred J Gomes Elementary School (tract 6519) and the Renaissance Community Innovation Elementary School (tract 6519) had low scores in each subject area, with the third and fourth lowest science scores in the City. According to the Massachusetts Department of Elementary and Secondary Education's Accountability Classification, New Bedford's public school district requires "focused/targeted support." Table 6.1.2 compares the schools in the RECAP tracts to the rest of the City.

Map 5: Limited English Proficiency and RECAPS



⁷ U.S. Census Bureau, 2017 American Community Survey Five-year Estimates

Map 6: Publicly Supported Housing and RECAPS

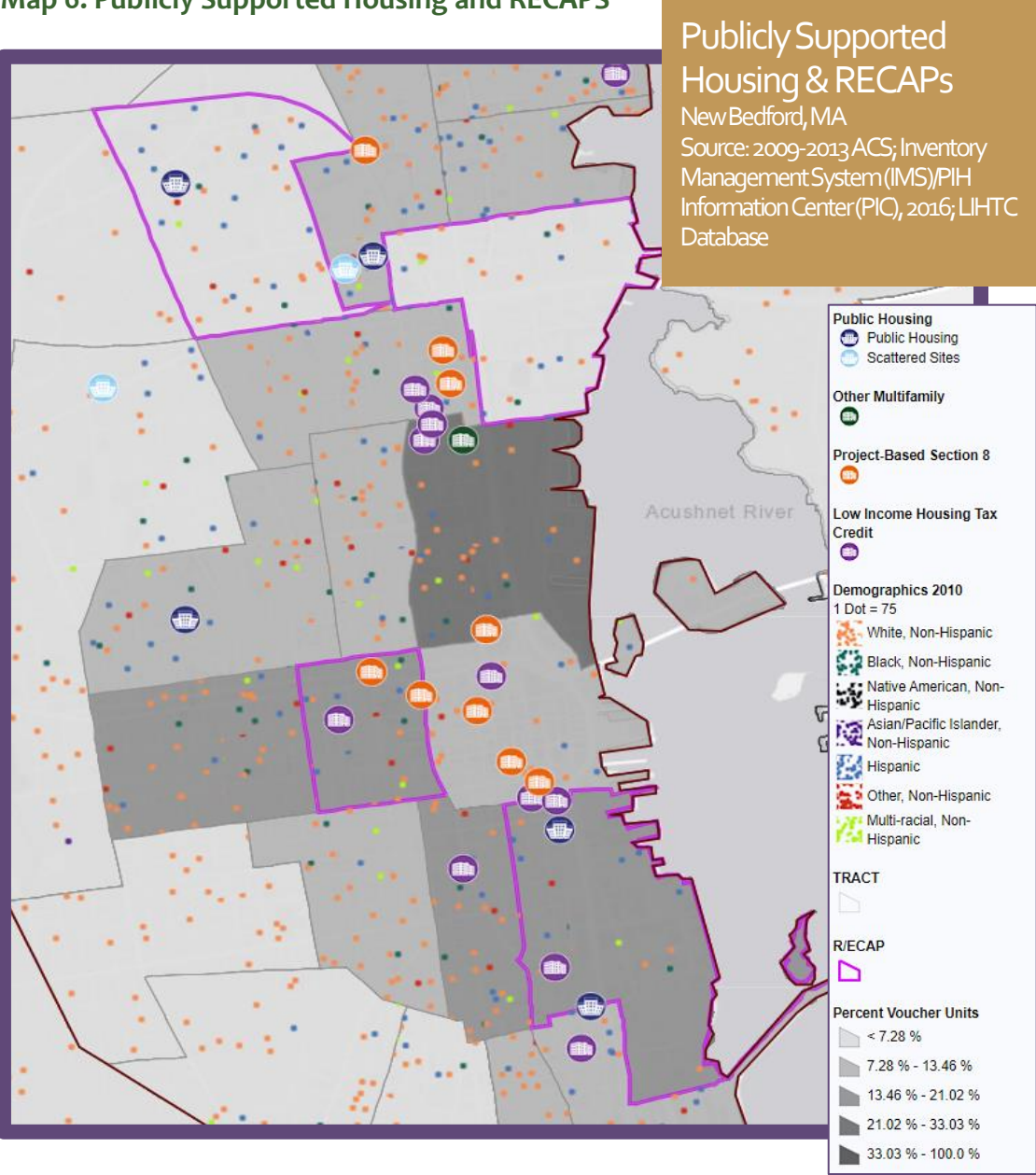


Table 6.1.2: New Bedford 2019 Next Generation MCAS Achievement Results

School	ELA Average Scaled Score	Math Average Scaled Score	Science Average Scaled Score
Alfred J Gomes Elementary School	489.4	488.0	478.5
Carlos Pacheco Elementary School	499.3	499.2	497.9
Renaissance Community Innovation School	492.6	485.9	479.3
Sgt William H Carney Academy	500.60	497.2	495.8
Whaling City Junior/Senior High School	459.2	455.8	N/A
District Average Scaled Score	491	490	486
State Average Scaled Score	501	499	499

Source: MA Department of Elementary and Secondary Education School and District Profiles

SEGREGATION/INTEGRATION

Patterns of segregation and integration may indicate fair housing issues in a community. While maps are an excellent resource for observing residential patterns of people in protected classes, the dissimilarity index is another way to observe segregation and integration levels in a community between different racial/ethnic groups.

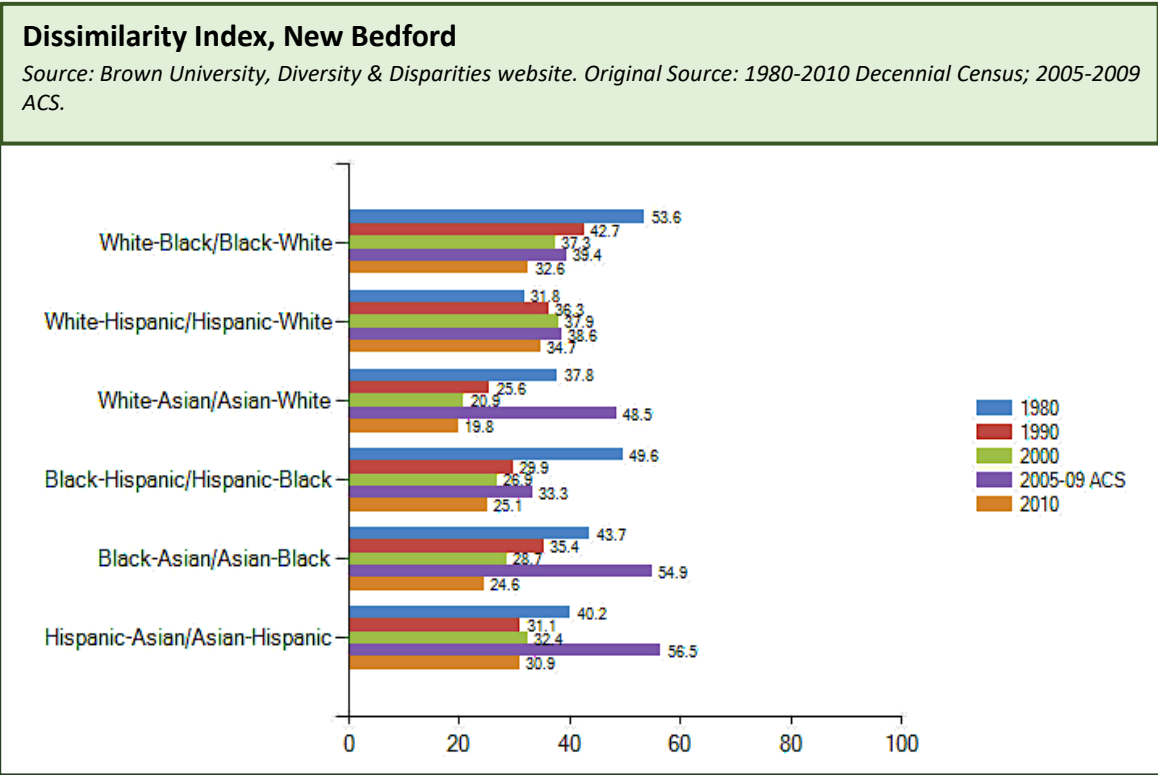
The Dissimilarity Index measures the distribution of groups across census tracts or block groups and provides a value across the community as a whole. Values below 40 indicate low segregation among the groups; values between 40-54 indicate moderate segregation between groups. Values of 55 and over indicate high segregation among groups in the community. Table 6.2.1 *Racial/Ethnic Dissimilarity Trends* shows how different groups are distributed in New Bedford. This data suggests low segregation among Blacks and Asians with Whites and moderate segregation between Hispanic and White populations. According to this data, New Bedford has more integrated living patterns than the CBSA.

Table 6.2.1: Racial/Ethnic Dissimilarity Trends								
	(New Bedford, MA CDBG, HOME, ESG) Jurisdiction				(Providence-Warwick, RI-MA) Region			
Racial/Ethnic Group	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	35.84	34.17	30.98	38.39	52.70	53.73	50.22	54.42
Black/White	42.58	37.33	32.55	38.04	60.20	55.36	50.81	55.43
Hispanic/White	36.25	37.93	34.74	42.19	57.82	64.47	60.11	62.09
Asian or Pacific Islander/White	25.85	20.95	20.00	34.00	47.07	41.23	36.60	43.74

Source: Decennial Census
Note: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

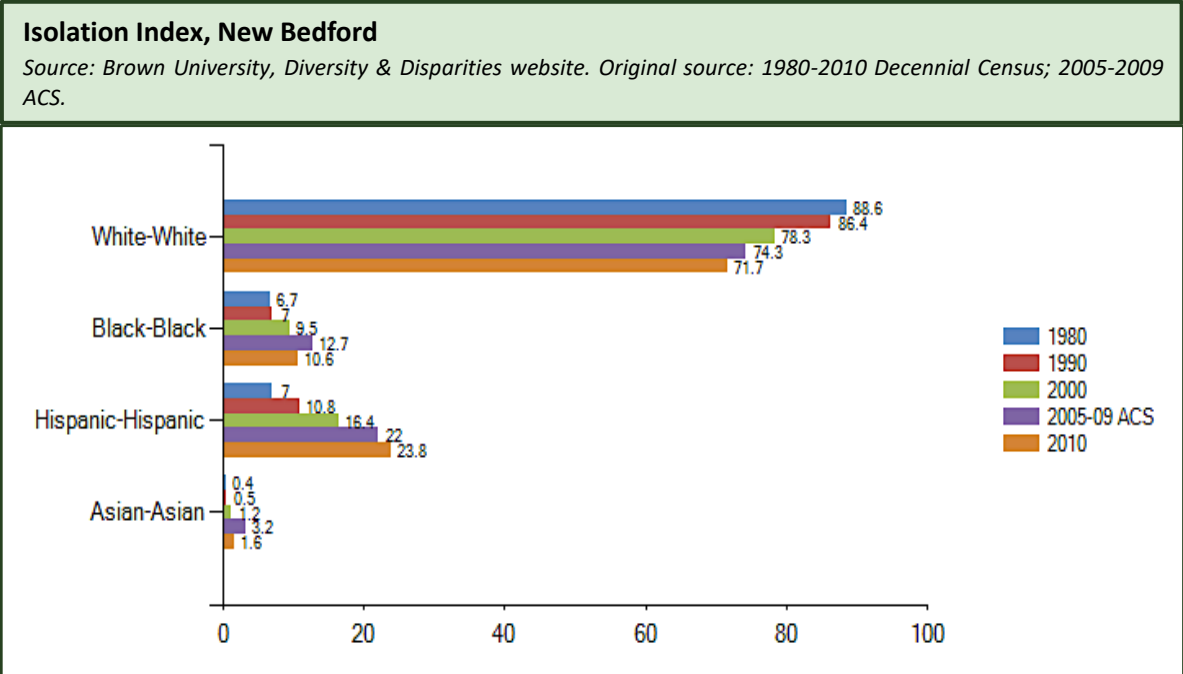
The Dissimilarity Index Chart below is from Brown University’s website *Diversity and Disparities*. This chart shows the change in the index over time and measures dissimilarity across non-white population groups and between Whites and people of color. The data show that over time there has been more integration across population groups in New Bedford. It also shows some anomalies in data, with the ACS figures indicating a greater incidence of segregation and off trend from the decennial census figures. Since the ACS is based on lower sampling levels and yields a high margin of errors for some data points, it is less reliable than the full count decennial census.

In addition to the Dissimilarity Index, Brown University also measures the Isolation Index. The Isolation Index measures the percentage of people with the same race or ethnicity living in the same census tract. A value of 0 indicates the population being measured is dispersed throughout a community. A value of 100 means the population is isolated within the community.



For races and ethnicities that have a low total population, these figures necessarily will be lower. The chart in this section shows the Isolation Index for New Bedford. The data indicate that White residents tend to live in census tracts with a high percentage of White people, and the Hispanic population is growing in concentration as the population grows. Blacks and Asians tend to be more dispersed throughout the community; however, on the whole, there are fewer Blacks and Asians in New Bedford than Whites and Hispanics.

This data corroborates the accounts of attendees of the AI focus group who remarked that while the City has a diverse population, especially in comparison to the larger region, there is little integration within the City with populations between the different races and ethnicities.



7.0 Housing Quality & Affordability

The housing quality in New Bedford presents fair housing issues as there is a great disparity in housing conditions around the City, with the poorest and least enfranchised people living in the worst conditions. As discussed during the AI Focus Group and in interviews with service providers, recent immigrants to New Bedford often find themselves living in housing that is of a lower standard but not having the power to do anything about it.

New Bedford has 43,285 housing units in the City, most of which are in 2-4 unit properties, which for decades supplied housing to people working in the City’s textile mills, factories, and fishing industries.

Table 7.1.1: Residential Properties by Number of Units		
Number of Units	Number	Percent
1 unit, detached structure	13,635	31.5%
1 unit, attached structure	1,000	2.3%
2-4 units	19,955	46.1%
5-19 units	5,070	11.7%
Total	43,285	100.0%

Source: 2017 ACS B25024

The second most common housing type is the single-family detached home. Located primarily in the north and far west of the City. Some of these homes provide a stark contrast to the triple-deckers packed densely along the central city streets. The County Street Historic District is where one can find the grand houses of the industry barons built during the height of the City’s wealth, some of which remain single-family homes and others split into separate apartments, condominiums, and supportive housing.

Renters occupy most of the housing in New Bedford: renters occupy 22,695, or 58%, of the City’s housing units.⁸ Generally, renters live in older units and poorer housing conditions than owners, with 61% living in homes built before 1960, and 47% live in properties with one or more deficient housing conditions. Deficient housing conditions are defined as overcrowding, lack of kitchen or

⁸ 2017 American Community Survey.



sanitation facilities, or cost burden.⁹ In comparison, 52% of owners live in properties built before 1950, and 37% live in homes with at least one deficient housing condition. In general, the age of New Bedford’s housing stock is a concern for all occupants. Still, it presents hazards to occupants

⁹ A household is considered cost-burdened if it spends more than 30% of household income on rent and utilities or mortgage, taxes and insurance

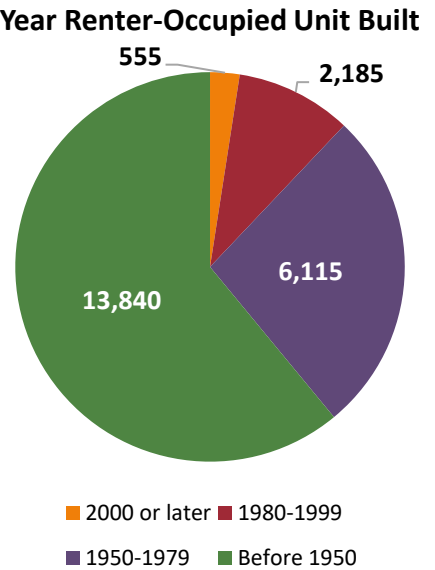
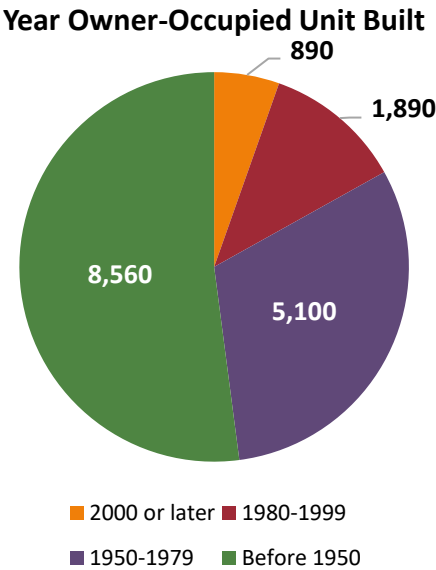
with few resources to make repairs and perform general maintenance. For low-income renters with children, the likely presence of lead-based paint in units is an added concern.

While the condition of housing and risks to occupants are general community development concerns, they become fair housing concerns when protected classes are disproportionately affected by poor housing conditions. Data collected from the City Assessor’s property database verifies the locations of New Bedford properties with very low values. When comparing this information to areas where there is a predominance of people of color, these areas overlap, indicating that people of color in New Bedford are more likely to live in poor conditions than Whites. Maps 2 and 3 reiterate these findings.

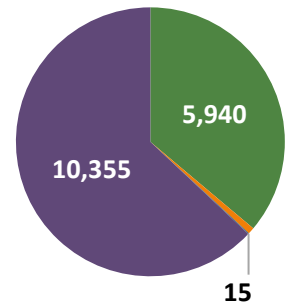
Another fair housing concern is the lack of housing suitable for people with physical disabilities. By its nature, New Bedford’s housing presents challenges to people with mobility impairments; this is especially true in the City’s more affordable neighborhoods. Poor sidewalk conditions exacerbate the challenges of “walk-up” units in which it is necessary to use stairs to reach the first-floor unit. Section 9.0 *Disability and Access* further discusses this concern.

HOUSING AFFORDABILITY

Related to housing quality are housing affordability and New Bedford residents' ability to find affordable units in the City. Information gathered through focus groups and interviews indicate that finding units to rent is a concern for voucher holders in the City. This observation relates to the quality of the City's housing stock, availability of units that can pass Section 8 Housing Quality Standards (HQS), and units that are deleaded. Discrimination complaints filed with Massachusetts Commission Against Discrimination (MCAD) indicate that source of income discrimination is a common occurrence in New Bedford, with landlords refusing to rent to tenants with vouchers because they do not want to improve units to pass an HQS inspection.

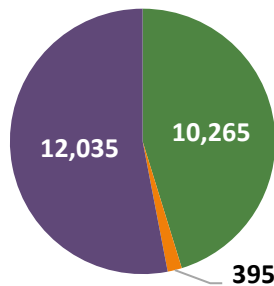


Condition of Owner-Occupied
Units



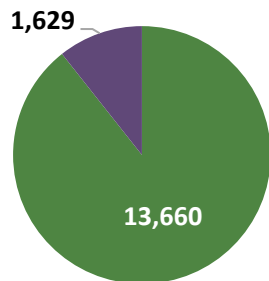
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■ Two Selected Conditions
■ Three Selected Conditions
■ Four Selected Conditions
■ No Selected Conditions

Condition of Renter-Occupied
Units



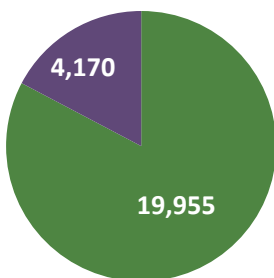
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■ Two Selected Conditions
■ Three Selected Conditions
■ Four Selected Conditions
■ No Selected Conditions

Risk of Lead-Based Paint
Hazard - Ownership Units Built
Before 1980



■ Ownership Units Built Before 1980
■ Ownership Units Built Before 1980 w/ Children Present

Risk of Lead-Based Paint
Hazard - Rental Units Built
Before 1980



■ Rental Units Built Before 1980
■ Rental Units Built Before 1980 w/ Children Present

Table 7.2.1: Units Affordable to Households Based on Income

	Owner	Renter
30% HAMFI	-	2,365
50% HAMFI	225	6,635
80% HAMFI	1,905	15,650
100% HAMFI	4,605	-

*HUD Area Median Family Income

Source: HUD Exchange

Table 7.2.2: Monthly Rent

	Fair Market Rent	High HOME Rent	Low HOME Rent
No bedroom	\$743	\$743	\$676
1 bedroom	\$777	\$777	\$724
2 bedroom	\$933	\$933	\$868
3 bedroom	\$1,169	\$1,169	\$1,003
4 bedroom	\$1,261	\$1,261	\$1,120

Source: HUD Exchange, 2019 HOME Rents

Thirteen of the 31 cases filed with MCAD between 2015-2019 complained of discrimination based on source of income or presence of children (familial status). Twelve of these cases were settled, or a determination of probable cause was reached. The result of the thirteenth case is unknown.¹⁰

Increasing market-rate rents also present a challenge for voucher holders. Current Fair Market Rents are not keeping pace with increases in market-rate rents, and landlords choose to forego renting to voucher holders as they can command higher rents in the general market. Fair housing advocates report that landlords have begun to use this tactic as an under-cover way to deny voucher holders units. Instead of landlords telling prospective tenants that they do not want to rent to them because of the need to pass inspections, landlords can now charge a slightly higher rent (and get it) to avoid renting to voucher holders.¹¹

As discussed in the City's Consolidated Plan Market Analysis, housing affordable to owners and renters with incomes under 100% HAFMI is scarce in New Bedford. Owner housing prices have been rising, and units that are still affordable to owners at the lower-income ranges require extensive repairs to make them lead-safe and suitable for occupancy. Homes that were once affordable to owners at 100% HAFMI have now increased in price and are no longer affordable to this income group. While owners have challenges in finding suitable, affordable housing, renters have a more difficult time.

The City's supply of affordable rental housing is inadequate to meet demand. There is only one affordable rental unit for every three households with incomes at 30% HAFMI. For households with incomes at 50% HAFMI, there are enough affordable rental units. Still, many of them are occupied by lower-income households, depleting the supply and resulting in high cost-burden levels for renters with incomes at 30% HAFMI. The same is true for 80% HAFMI units. While there is an adequate supply of units affordable at this income level, due to the lack of units available to households with the lowest incomes, households with lower incomes are forced to rent these units and suffer the cost burden.

¹⁰ Massachusetts Commission Against Discrimination, Housing Discrimination Cases City of New Bedford, 2015-2019 as supplied by the Records Officer, March 2020.

¹¹ Interview with PACE, March 6, 2020.

DISPROPORTIONATE HOUSING NEEDS

In a fair housing analysis, it is essential to look at how housing needs are similar or differ across races and ethnicities and by types of households, particularly family households. Comprehensive Housing Affordability Strategy (CHAS) data illustrates the distribution of housing needs across these groups. For this discussion, a household has a housing need if at least one of the following is true:

- They live in overcrowded conditions;
- Their housing lacks kitchen or plumbing facilities; or
- They pay more than 30% of their income on rent.

Table 7.3.1 shows the most recent version of compiled data through the HUD Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T), which is from 2009-2013. This data indicates that American Indian/Alaska Natives and Asian/Pacific Islanders have the highest incidence of housing problems across races and ethnicities in New Bedford.

Hispanics have a modestly higher incidence of housing problems than Blacks or Whites. Data indicates that Asian/Pacific Islanders and Hispanics also have disproportionately higher severe housing needs than other populations in the City. Severe needs are characterized by cost- burden greater than 50% of household income. Approximately half of all family and non-family households have housing needs in New Bedford.

The *Share of Each Population with at least One Housing Problem* chart, based on more recent data, shows how housing problems are split among groups with incomes below 100% of AMI. These same groups are experiencing housing problems; people in this income category are more likely to have housing problems. They have fewer housing options and less income to address housing problems than people of higher incomes. Some may be eligible to receive housing assistance through the New Bedford Housing Authority or via the City’s CDBG programs, operated by the Office of Housing and Community Development.

Table 7.3.1: Demographics of Households with Disproportionate Housing Needs

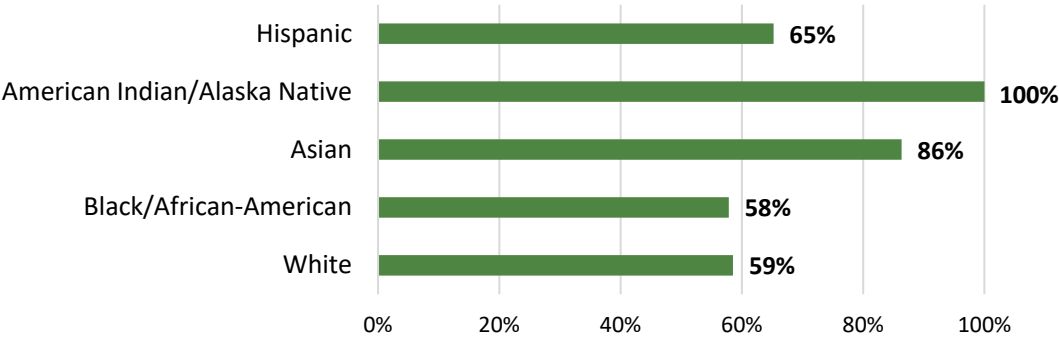
Disproportionate Housing Needs	(New Bedford, MA CDBG, HOME, ESG) Region		
Households Experiencing Any of 4 Housing Problems – Race/Ethnicity	# Of Problems	# Of Households	% Problems
White, Non-Hispanic	12,055	28,509	42.28%
Black, Non-Hispanic	1,030	2,267	45.43%
Hispanic	3,040	5,410	56.19%
Asian or Pacific Islander, Non- Hispanic	173	258	67.05%
Native American, Non-Hispanic	53	88	60.23%
Other, Non-Hispanic	1,220	2,534	48.15%
Total	17,580	39,065	45.00%
Household Type and Size			
Family Households, <5 people	8,260	20,380	40.53%
Family Households, 5+ people	1,165	2,605	44.72%
Non-family households	8,160	16,080	50.75%
Households Experiencing Any of 4 Housing Problems – Race/Ethnicity	# Of Problems	# Of Households	% Problems
White, Non-Hispanic	5,975	28,509	20.96%
Black, Non-Hispanic	684	2,267	30.17%
Hispanic	1,720	5,410	31.79%
Asian or Pacific Islander, Non- Hispanic	129	258	50.00%
Native American, Non-Hispanic	23	88	26.14%
Other, Non-Hispanic	605	2,534	23.88%
Total	9,145	39,065	23.41%

Source: HUD Exchange, CPD Maps, CHAS Data.

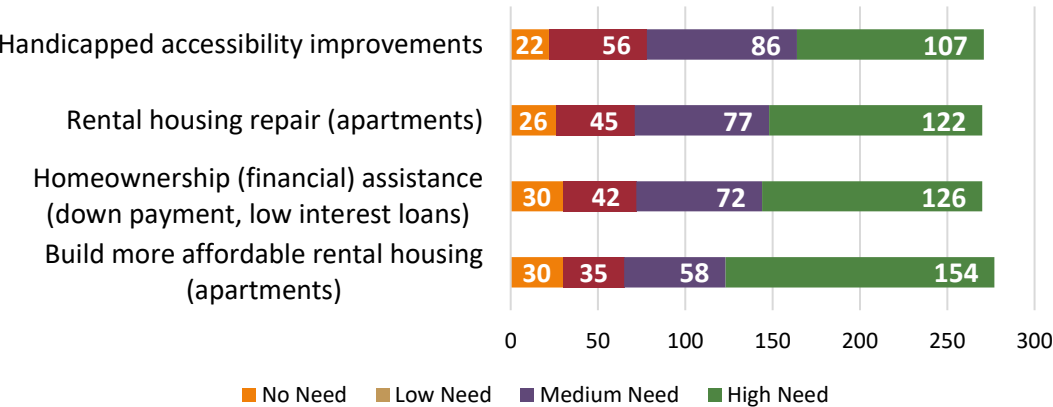
Information gathered through the City's Consolidated Plan's Resident Needs Survey corroborates the CHAS data for New Bedford. The vast majority of survey respondents indicated a high need for rental housing repair, affordable rental housing, and financial assistance to potential homeowners. Residents also expressed a need for housing improvements to increase accessibility for people with disabilities.

Share of the Population with at Least One of Housing Problem
(0-100% AMI)

Source: CHAS 2012-2016



Housing Activities Ranked by Need



REGIONAL HOUSING

New Bedford's housing stock differs dramatically from that of the surrounding region, except for Fall River. The region's housing comprises single-family detached homes, with this housing type comprising 57% of the county's housing inventory, versus 32% in New Bedford. Two- to four-unit properties, the second most prominent housing type, comprise 26% of the housing stock in Bristol County and 47% in New Bedford. The data makes it clear that New Bedford has the largest share of regional multi-unit and rental housing.

Residents in the surrounding region are more often owners than renters. In fact, with the exception of Fall River, the Greater New Bedford region has one of the greatest rates of renter occupancy - 59%. These cost differences make it difficult for New Bedford residents, especially renters and Housing Choice Voucher holders, to move to one of the surrounding towns, diminishing mobility.

Furthermore, New Bedford is the area's main supplier of affordable housing units. Table 7.4.1 shows the number of affordable units in each town as of September 2017, according to the State's Subsidized Housing Inventory maintained by the Massachusetts Department of Housing and Community Development (DHCD).

Regionally, Blacks, Hispanics, and Native Americans tend to have more significant housing needs than other populations. Almost 50% of Black households have housing needs, compared to 36% of Whites. Hispanics and Native Americans have even greater needs, with 57% of households in those groups experiences housing problems. Interestingly, in the region, Asian/Pacific Islanders experience considerably less housing needs than in New Bedford, with 45% of this population experiencing problems. Family households with less than five members have the lowest incidence of housing problems in the region, while non-family households account for almost half (48%) of such problems. Overall, a fewer proportion of households experience housing problems in the region compared to New Bedford alone.

Table 7.4.1: Subsidized Housing Inventory	
	Percent Subsidized Units
Acushnet	2.40%
Dartmouth	8.20%
Fairhaven	6.90%
Fall River	11.10%
Freetown	2.60%
Marion	7.70%
Mattapoisett	2.70%
New Bedford	11.90%
Rochester	0.40%
Westport	3.60%

Source: DHCD, Chapter 40B Subsidized Housing Inventory, September 2017, located at: https://www.mass.gov/files/documents/2017/10/10/shiinventory_0.pdf, retrieved 4-4-2020.

Table 7.4.2: Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs	(Providence-Warwick, RI-MA) Region		
Households Experiencing Any of 4 Housing Problems - Race/Ethnicity	# Of Problems	# Of Households	% Problems
White, Non-Hispanic	189,100	519,330	36.41%
Black, Non-Hispanic	12,329	25,021	49.27%
Hispanic	27,898	48,732	57.25%
Asian or Pacific Islander, Non- Hispanic	5,588	12,445	44.90%
Native American, Non-Hispanic	932	1,636	56.97%
Other, Non-Hispanic	6,825	12,893	52.94%
Total	242,710	620,095	39.14%
Household Type and Size			
Family Households, <5 people	114,600	348,685	32.87%
Family Households, 5+ people	20,000	46,774	42.76%
Non-family households	108,095	224,620	48.12%
Households Experiencing Any of 4 Housing Problems - Race/Ethnicity	# Of Problems	# Of Households	% Problems
White, Non-Hispanic	88,970	519,330	17.13%
Black, Non-Hispanic	7,108	25,021	28.41%
Hispanic	16,913	48,732	34.71%
Asian or Pacific Islander, Non- Hispanic	3,260	12,445	26.20%
Native American, Non-Hispanic	492	1,636	30.07%
Other, Non-Hispanic	3,653	12,893	28.33%
Total	120,425	620,095	19.42%

Source: HUD Exchange, CPD Maps, CHAS Data.

8.0 New Investment & Displacement

New Bedford is beginning to see a surge in interest from people looking for affordable housing outside of the Boston area. With the construction of the South Coast Rail underway and the planned location of two commuter rail stops, there is an additional interest as people working in Boston will have access to the City in a way that hasn’t existed previously. Once complete, they will be able to travel from the Greater New Bedford to Boston’s South Station in roughly an hour.

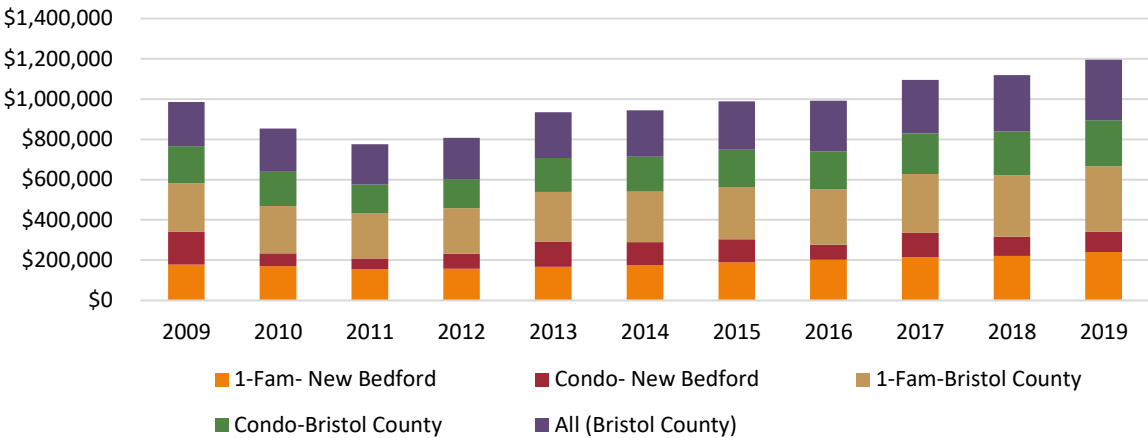
Housing prices reflect new investment in the area. Between 2009 and 2019, the number of single-family and condominiums sales in the City increased by 44%, and the median sales prices increased by 46%. Despite the increased market activity, New Bedford's values are still well below those of surrounding towns. The City has worked to attract new industries, including wind energy, and encourage entrepreneurship through the Quest Center for Innovation. The Quest Center particularly supports start-ups. Seeing the local potential and that of the surrounding region, the City aims to draw industries that pay higher wages to the area.

The convergence of rail construction and the City working to bring new industries to the area will likely increase pressure on the housing market. While the influx of wealth into the City may be viewed as positive and may help regenerate areas that are already seeing renewed interest, the risk of displacement for lower-income households is a possibility. As these households find it harder to secure affordable housing, industries that depend on them may suffer.. According to Zillow, the average of the middle quintile of rental units in 2015 was \$1,021. In 2019 that average is approximately \$200 more, at \$1,216.¹² Given the rents charged in the surrounding region and scarce publicly supported housing outside of New Bedford, it will be challenging for lower-income households to find housing nearby. As discussed previously, New Bedford already lacks enough affordable housing at the lowest income levels (<30% AMI). As housing demand increases in the higher income levels, people will start to look for bargains within the lower-cost units and invest additional dollars in renovating them. Under this scenario, the City is likely to lose its private market "affordable" housing gradually.

¹² Zillow, “ZRI Time Series: All Homes Plus Multifamily,” retrieved 3-28-2020.

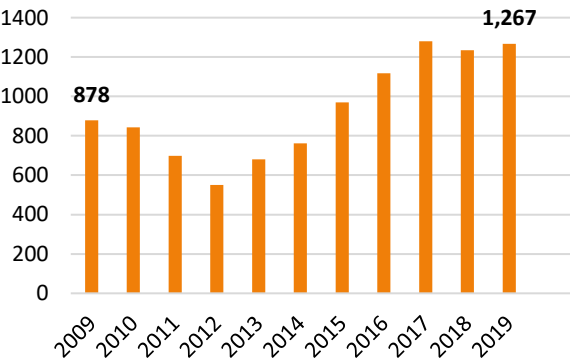
Median Single Family and Condominium Sales Prices in New Bedford
and Bristol County

Source: The Warren Group



Number of Single Family and
Condominium Sales in New Bedford

Source: The Warren Group



Number of Single Family and
Condominium Sales in Bristol County

Source: The Warren Group

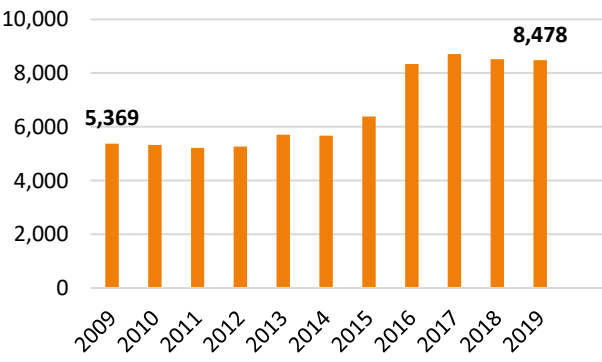


Table 8.1.1: Typical Single-Family Home Value 2019	
Acushnet	\$315,500
Dartmouth	\$377,105
Fairhaven	\$305,311
Fall River	\$265,533
Freetown	\$369,629
Marion	\$492,616
Mattapoisett	\$281,524
New Bedford	\$253,358
Rochester	\$423,337
Westport	\$406,196

Source: Zillow, ZHVI Single Family Residence, Retrieved 3-28-2020

Note: The value was calculated by averaging monthly figures

Table 8.1.2: Average of Middle Quintile - Rent Charge in 2019	
Acushnet	\$1,349
Dartmouth	\$1,478
Fairhaven	\$1,332
Fall River	\$1,224
Freetown	\$1,481
Marion	\$1,883
Mattapoisett	\$1,816
New Bedford	\$1,217
Rochester	\$1,912
Westport	\$1,463

Source: Zillow, "ZRI: All Homes Plus Multifamily," retrieved 3-28-2020.

9.0 Disability & Access

Over 14,500 people living in New Bedford have a disability,¹³ representing over 15% of the City’s population. Approximately 8% of people with disabilities are under 18 years of age, 14% are between 18 and 34 years of age, 43% are between 35-64 years of age, and 35% are over 65.¹⁴ Table 9.1.1 shows the types of disabilities people reported in the ACS, and Maps 7 and 8 show where people with disabilities live in the City. From the maps, it is clear there are clusters where those with disabilities tend to live.

Areas to the north of downtown and Route 195 show clustering of people with disabilities. The northern downtown is also an area where there are high concentrations of Portuguese and Hispanic origin people. Areas just west of downtown, the north section of the South End, and in the near North End also indicate clusters of people with disabilities. The location of publicly supported housing for elderly persons contributes to the concentrations of being seen in these areas.

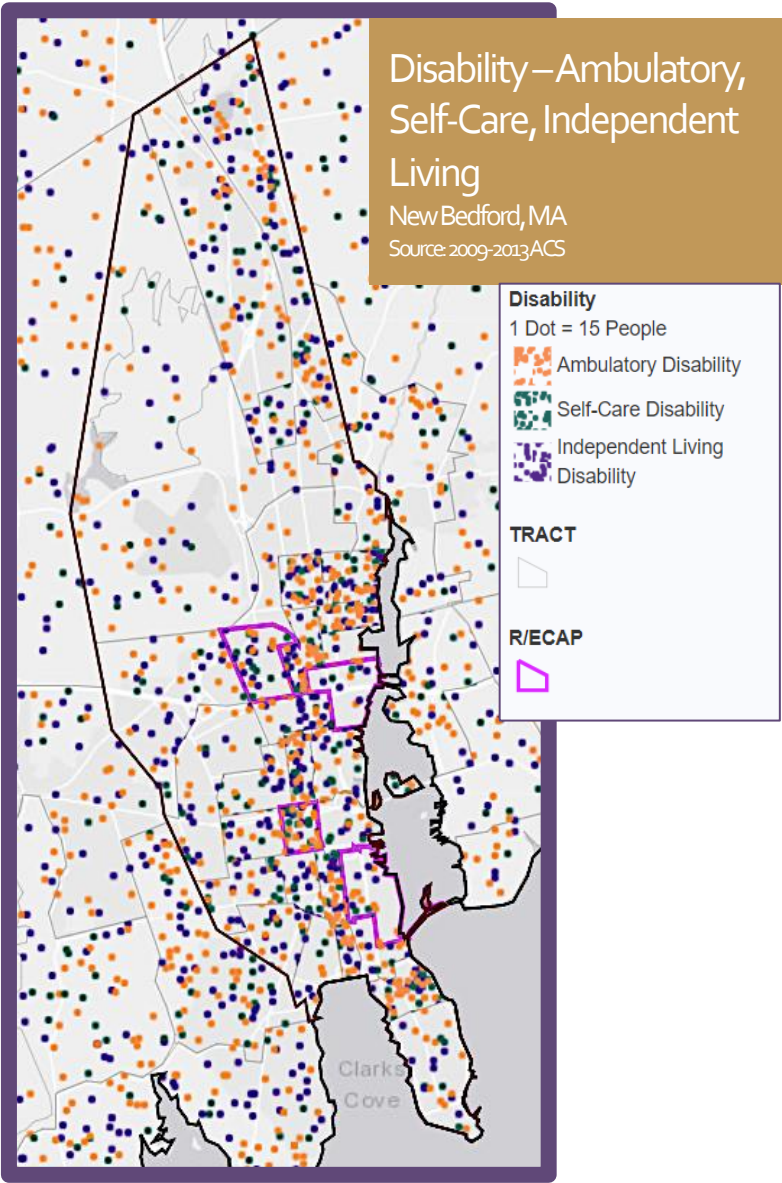
More than half of the people with disabilities in New Bedford have an ambulatory disability. The type and age of New Bedford’s housing stock present particular challenges for persons with ambulatory impairments. Many homes are “walk-ups” with stairs leading to the front door and the upper floors. The City’s aging infrastructure, i.e., sidewalks, makes it difficult for people with mobility impairments to get around the City easily.

Table 9.1.1: People with Disabilities			
	New Bedford	Bristol County	Massachusetts
Hearing	3,585	22,229	223,425
Vision	2,148	11,573	129,817
Cognitive	6,824	33,236	317,684
Ambulatory	7,304	37,476	376,868
Self-care	3,693	15,781	157,882
Independent Living	6,286	28,239	285,325

Source: 2017 ACS S1810

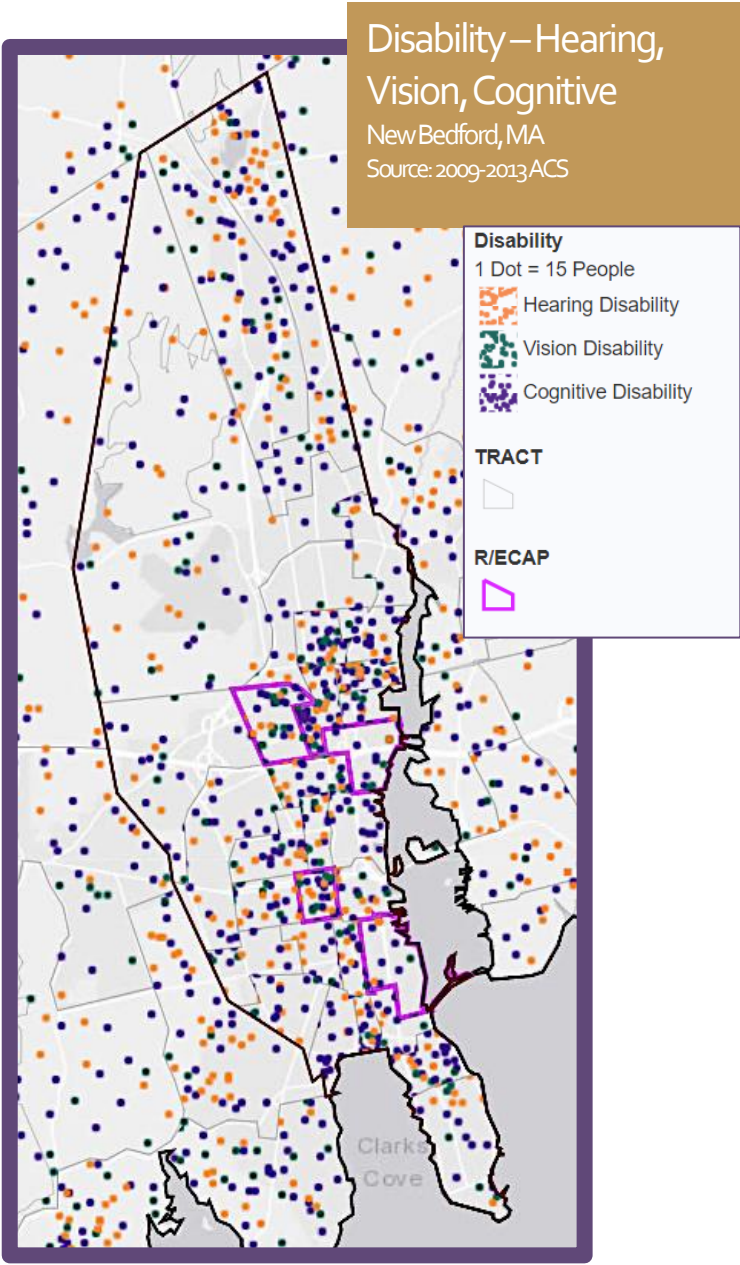
¹³ The U.S Census Bureau separates disabilities into six main types: hearing, vision, cognitive, ambulatory, self-care, and independent living. An ambulatory disability is having serious difficulty walking or climbing stairs. A cognitive disability is having difficulty remembering, concentrating, or making decisions. A self-care difficulty is having difficulty bathing or dressing. An independent living difficulty is having difficulty doing basic tasks alone

Map 7: Disability – Ambulatory, Self-Care, Independent Living



¹⁴ 2017 ACS S1810

Map 8: Disability –
Hearing, Vision,
Cognitive



MENTAL HEALTH, SUBSTANCE ABUSE & HOMELESSNESS

People with mental health issues can find it challenging to secure housing. While they can find the process of obtaining housing itself difficult, reluctance on the part of landlords to rent to tenants who have mental health issues and substance use disorders often presents a challenge. Stakeholders participating in SouthCoast Health’s Community Health Needs Assessment noted the strong connection between mental health issues, substance use disorders, and homelessness.¹⁵

In 2020, the New Bedford Point In Time Count (PIT)¹⁶ identified 433 individuals and children experiencing homelessness and living in emergency and transitional shelters or on the streets. This figure includes 53 people living unsheltered, 288 people living in emergency shelters, and 92 people in transitional housing. Eighty-one people included in the PIT self-reported mental health issues, and 61 reported issues with substance use; 40% of people experiencing homelessness in New Bedford also self-identified as having both mental health and substance use issues. Fifty-seven people identified as domestic abuse survivors, and 11 had been diagnosed with HIV/AIDs.

The New Bedford Continuum of Care’s Housing Inventory Chart (HIC) reports 332 emergency shelter beds, 113 transitional housing beds, and 598 permanent supportive housing beds in the City. New Bedford and regional organizations offer a full range of services to people experiencing homelessness. Seventy organizations and public entities comprise the Homeless Service Provider Network (HSPN). These organizations work together to provide services to the community as part of the City’s Continuum of Care (CoC).

DISCRIMINATION AGAINST PEOPLE WITH DISABILITIES

Discrimination against people with disabilities may take different forms. Sometimes discrimination plays out as limited access to opportunity as presented when there is inaccessible infrastructure for people with disabilities to navigate City streets and movement within a community easily. Sometimes it is limited public transit options and issues with reliability that

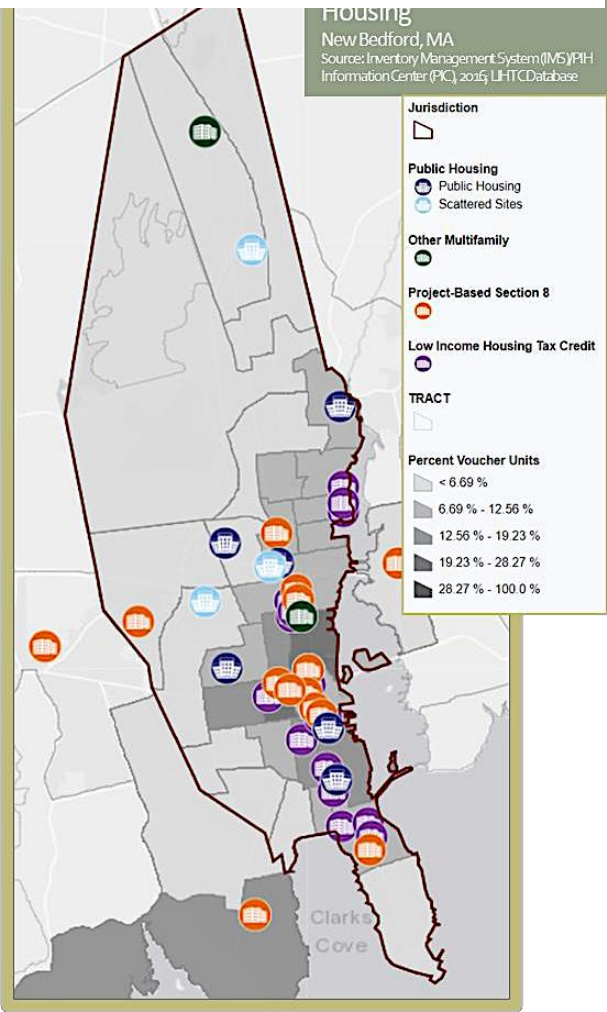
make it difficult to get to jobs, health appointments, or run errands. Discrimination also manifests itself in landlords refusing to rent to tenants with physical disabilities because they do not want to make modifications to their units or tenants with mental health issues they fear may be disruptive to neighbors.

¹⁵ Ibid.

¹⁶ New Bedford Homeless Service Providers Network (HSPN), PIT 2019 Infographic, is located at <https://www.nbhspn.com/nbhspn/wp-content/uploads/2019/04/PIT-2019-INFOGRAPHIC.pdf>, retrieved 4-5-2020..

10.0 Subsidized Affordable Housing

Map 9: Subsidized Affordable Housing



New Bedford’s subsidized affordable housing inventory includes public housing units, Project-based Section 8 developments, scattered-site units, and Low-Income Housing Tax Credit (LIHTC) Properties. It serves individuals, families, the elderly, and persons with disabilities.

The New Bedford Housing Authority manages 2,500 units of public housing - of which 102 are accessible to people with disabilities - and 1,800 housing choice vouchers.¹⁷ In addition, the City has 1,572 LIHTC units.¹⁸ The City’s full list of LIHTC units is in Table 10.1.2 below. The vast majority of the City’s subsidized affordable housing units are located in the central part of the City, as shown on Map 9. This map also shows patterns of voucher usage within the City. Darker shaded areas indicate a higher proportion of units where a Housing Choice Voucher (HCV) is being used than lighter shaded areas. Similarly to the subsidized affordable housing units, the map shows higher concentrations of voucher usage in census tracts in the central part of the City.

This distribution of races and ethnicities across subsidized affordable housing types is important to consider, as it could indicate concentrations of certain races or ethnicities by development type. Table 10.1.1 provides data on who lives in the different types of subsidized affordable housing units by the household's race and ethnicity. The racial and ethnic makeup of people living in subsidized affordable housing compared to the general population is closely correlated. Overall, approximately 73% of all households residing in publicly supported households are White, just under 6% are Black, and approximately 14% are Hispanic. General population figures for these populations in 2017 were estimated at around 67%, 6%, and 20%, respectively.¹⁹

Racial and ethnic data, however, amongst different types of subsidized affordable housing, does not always correlate to the general population—suggesting that there could be racial/ethnic disparities in access to different types of subsidized affordable housing and/or racial and ethnic concentrations in certain developments. For example, Hispanic households constitute more than half of households living in public housing (55%), followed by Black households at 35.8%. (These populations make up 20% and 6%, respectively, of the general population in New Bedford.) White households comprise less than 10% of the population living in public housing, but over two-thirds of the general population. White households are more likely to live in Project-based Section 8, and "other" multifamily units than non-White households are. Black households are the most frequent users of Housing Choice Vouchers.

Given the distribution of subsidized affordable housing types throughout the City, it appears that geographic racial/ethnic concentrations do not exist strictly as a result of the racial and ethnic makeup of residents in subsidized affordable housing. However, it is important to note that the Department of Housing and Community Development (DHCD)’s 2019 Analysis of Impediments to Fair Housing Choice found that among the contributing factors to the creation/perpetuation of racially and ethnically concentrated pockets of poverty in the Commonwealth include the location and type of affordable housing created in specific neighborhoods of racially and

¹⁷ New Bedford Housing Authority website located at <http://newbedfordhousingauthority.org/about/>, retrieved 4-4-2020.

¹⁸ HUD LIHTC Database, <https://lihtc.huduser.gov/>, retrieved 3-8-2020.

¹⁹ 2017 ACS, B02001.

ethnically concentrated pockets of poverty in the Commonwealth include the location and type of affordable housing created in specific neighborhoods.

New Bedford is one of the region's primary suppliers of subsidized affordable housing. Map 9 shows the regional distribution of subsidized affordable housing. It is notable that in Bristol County, New Bedford and Fall River have by far the greatest number of subsidized affordable housing developments. The Massachusetts Department of Housing and Community Development's Subsidized Housing Inventory corroborates this fact for the region. Table 7.4.1 Subsidized Housing Inventory on page 36 shows that subsidized affordable housing is almost 12% of New Bedford's year-round housing. In comparison, with the exceptions of Dartmouth, Fairhaven, Fall River, and Marion, approximately 3% of units are subsidized in most surrounding towns.

Table 10.1.1: Race/Ethnicity								
(New Bedford, MA CDBG)								
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	147	8.7	604	35.8	929	55.1	4	.24
Project Based Section 8	817	66.5	144	11.7	250	20.34	7	.57
Other Multifamily	72	88.9	4	4.5	5	6.2	0	0
HCV Program	542	26.1	959	46.2	550	26.5	6	.29
Total Households	28,509	72.9	2,267	5.8	5,410	13.9	258	.66
0-30% of AMI	3,984	59.7	533	7.9	1,430	21.4	49	.73
0-50% AMI	7,284	55.8	857	6.6	2,660	20.4	79	.61
0-80% AMI	12,359	62	1,232	6.2	3,590	18	119	.60
(Providence-Warwick, RI-MA)								
Housing Type	#	%	#	%	#	%	#	%
Public Housing	4,296	41.7	1,540	14.9	4,240	41.2	161	1.6
Project Based Section 8	7,558	59.9	1,409	11.2	3,422	27.1	115	.91
Other Multifamily	374	67.2	57	10.2	115	20.7	3	.54
HCV Program	7,797	51.8	2,889	19.2	4,138	27.5	96	.64

Total Households	519,330	83.8	25,021	4.04	48,732	7.86	12,445	2.01
0-30% of AMI	63,145	69.2	6,492	7.12	15,810	17.3	2,169	2.38
0-50% AMI	101,570	61.2	10,287	6.2	24,623	14.9	3,643	2.20
0-80% AMI	177,810	68.2	14,956	5.73	34,173	13.1	5,496	2.11

Source: Decennial Census; APSH; CHAS
Note 1: Numbers presented are numbers of households not individuals

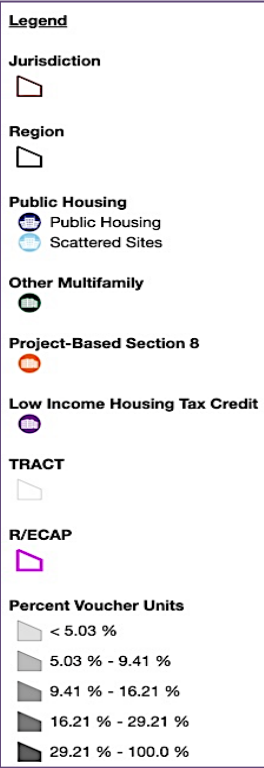
Table 10.1.2: New Bedford, LIHTC Properties									
Project Name	Project Address	Total Number of Units	Total Low-Income	Efficiency	1 BR	2 BR	3 BR	4 BR	Targets Specific Population w/ Specialized Services or Facilities
Manomet Place	194 Riverside Ave	76	NA	0	31	10	0	0	Yes
Whaler's Cove	114 Riverside Ave	120	NA	90	24	6	0	0	NA
Whaler's Place	90 Riverside Ave	75	75	1	69	5	0	0	NA
State Street Apts	198 State St	18	18	0	2	10	6	0	NA
Acushnet Commons	59 Linden St	12	12	0	1	3	8	0	Yes
Wamsutta Apts Phase II	184 State St	78	71	1	71	6	0	0	NA
Hazard Court Apts	12 Hazard Ct	36	36	0	36	0	0	0	NA
Austin Court	1012 Austin Ct	12	12	0	0	0	11	1	NA
United Front Two	285 Ash St	85	85	0	10	40	32	3	Yes
Melville Towers	850 Pleasant St	320	320	0	280	40	0	0	Yes
Verdean Gardens	163 Walnut St	110	28	NA	NA	NA	NA	NA	NA
Regency Tower	800 Pleasant St	129	33	0	38	80	11	0	No
Harborview Towers Lp	60 S Second St	140	NA	NA	NA	NA	NA	NA	NA
Bedford Village Project	111 Acushnet Ave	13	13	0	1	9	2	1	NA
New Verdean	99 Achushnet Ave	110	110	0	7	87	10	6	Yes
Grinnell House	379 County St	17	17	0	17	0	0	0	NA
South First St Revitalization Project	862 S First St	10	10	0	4	4	0	2	NA
Ingraham Place	80 Rivet St	19	19	0	2	10	7	0	Yes
Roosevelt St Revitalization Project	23 Roosevelt St	11	11	0	3	3	3	2	NA
Roosevelt II Project	49 Roosevelt St	11	NA	NA	NA	NA	NA	NA	NA
Bristol III		11	11	0	1	6	3	1	NA
Temple Landing I	97 107 Emerson St	84	NA	NA	NA	NA	NA	NA	NA
Temple Landing II	331A 351 Middle St	75	NA	NA	NA	NA	NA	NA	NA

Source: HUD LIHTC Database, <https://lihtc.huduser.gov/>, retrieved 3-8-2020.

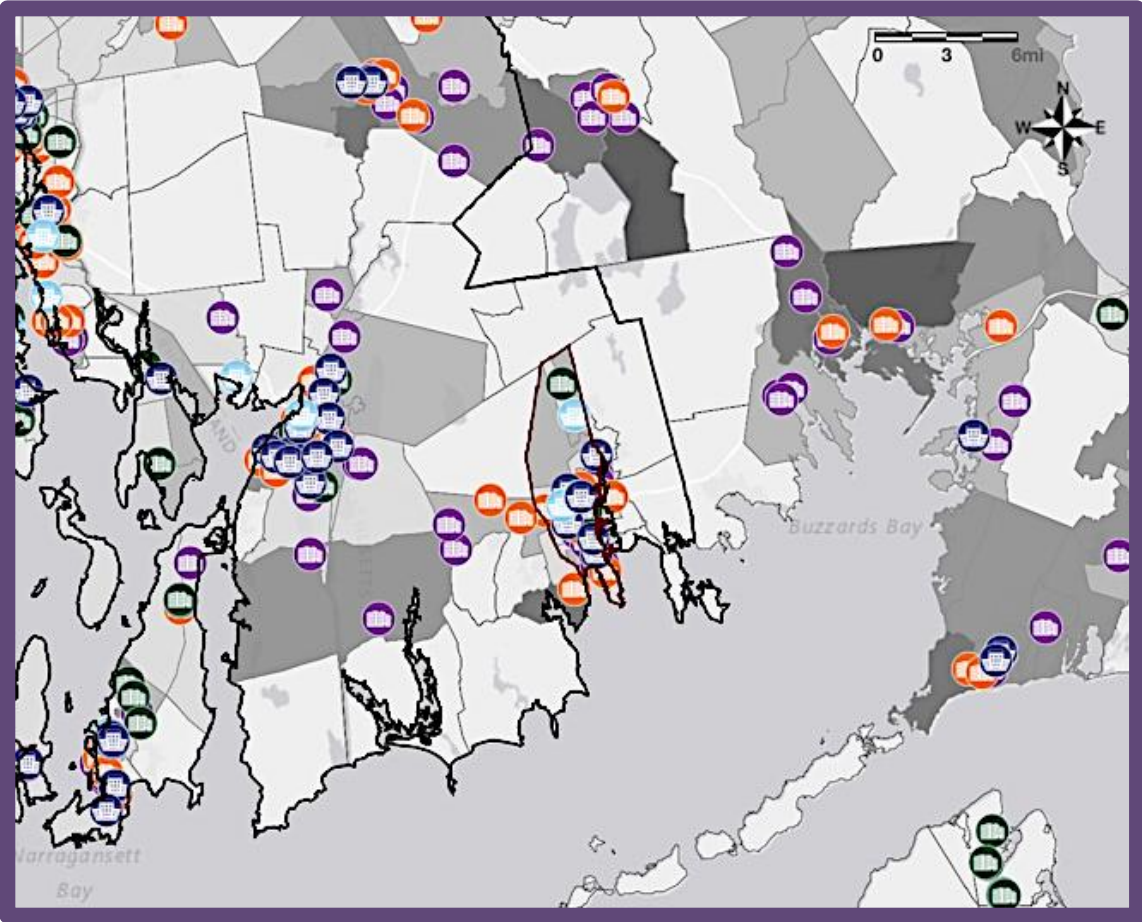
CREATION AND PRESERVATION OF AFFORDABLE HOUSING

The City of New Bedford has worked to generate residential investments in its neighborhoods, including subsidized affordable housing. Large lot requirements and exclusionary zoning in neighboring communities put the pressure on New Bedford to be the supplier of affordable housing options in the region. To encourage residential investment and make affordable housing development more manageable and less expensive, the City has worked to streamline the permitting process, and allow government financing to reduce development costs, utilizing HOME and CDBG funding.

As the City prepares to host two new commuter rail stations, barriers to affordable housing development will be of critical concern. The report released by the Federal Reserve Bank of Boston, “The Growing Shortage of Affordable Housing for the Extremely Low Income in Massachusetts,” indicates that many New Bedford renters have extremely low incomes - incomes at or below 30% of the area median. The report also found that between 25 and 50% of the City’s affordable housing units will expire by 2025, and very few of New Bedford’s market-rate units are affordable and available to renters with extremely low incomes.²⁰ With the anticipated market pressure added by people who may be drawn to living in the City once it has easy rail access to Boston, any loss of affordable housing will be detrimental to the City’s efforts to minimize the displacement of its residents.²¹



Map 10: Subsidized Affordable Housing in Bristol County



²⁰ Market Analysis, 2020-2024 Consolidated Plan, City of New Bedford, 2020.

²¹ Chiumenti, “The Growing Shortage of Affordable Housing for the Extremely Low Income in Massachusetts,” The Federal Reserve Bank of Boston, April 2019; 18, 25

11.0 Access to Economic Opportunity

HOMEOWNERSHIP

Homeowners occupy 42% of the City's housing, the vast majority of whom are White. While New Bedford has a high rate of renters in general, people of color are far more likely to be renters than owners. While 33% of the City's population is made up of people of color, they make up only 16.7% of owners.²² In other words, if you are a person of color in New Bedford, you are 3.5 times more likely to be a renter than an owner.

Table 11.1.1: Tenure by Race/Ethnicity of Householder, New Bedford		
Race/Ethnicity	Owner	Renter
One Race		
White	13,864	14,847
Black or African American	727	1,673
American Indian and Alaska Native	12	66
Asian	190	264
Native Hawaiian and Other Pacific Islander	0	0
Some Other Race	1,026	5,841
Two or More Races	371	610
Hispanic or Latino Origin	673	5,204
White alone, not Hispanic or Latino	13,654	13,940

Source: 2017 ACS Five-Year Estimates, S2502

Map 11 shows that the highest homeownership rates occur in the Far North End, West End, Rockdale North, and South End neighborhoods of the City. Not surprisingly, these are some of the City's highest income areas. Renters in New Bedford have a median household income of \$27,672, while owners have a median household income of \$65,487.²³

Homeownership levels in surrounding towns are generally much higher than in New Bedford. All surrounding towns have ownership levels at over 70%, and the vast majority have over 80% owner-occupancy. Fall River has ownership rates below New Bedford's at 35.7%.²⁴

²² 2017 ACS, S2502.

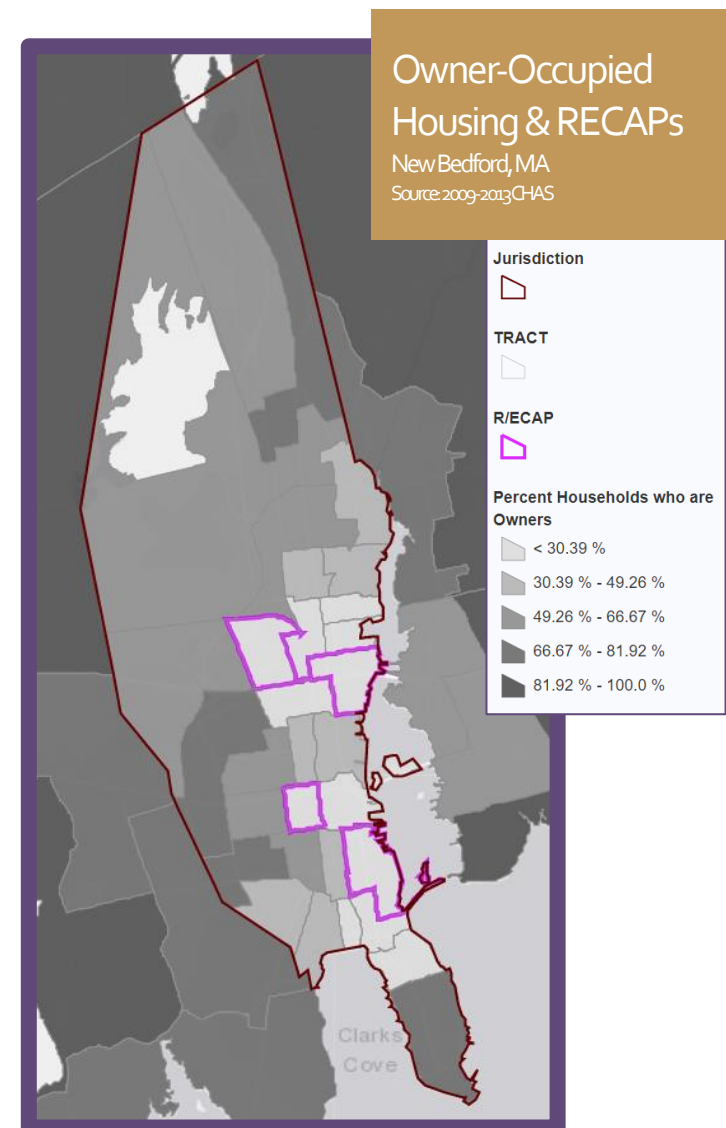
²³ 2017 ACS, B25119.

Lending Analysis

As homeownership is a basic means to build wealth in the United States, it is crucial to understand if barriers, other than income, exist for protected classes in accessing homeownership opportunities. The Home Mortgage Disclosure Act (HMDA) requires that lending institutions report on loan applications' receipt and processing. Data collected includes the demographics of the applicant and the result of the loan request. Analysis of this data can reveal biases in lending practices.

Analysis of HMDA data is available for the City of New Bedford through 2017. Table 11.1.2 shows the number of home purchase loan applications, originations, and denials in New Bedford between 2013 and 2017.

Map 11: Owner-Occupied Housing and RECAPS



²⁴ 2010 Decennial Census, SFI, H14.

Table 11.1.2: 2013-2017 Home Purchase - New Bedford					
	APPLICATIONS	ORIGINATIONS		DENIALS	
		Number	% of applications	Number	% of applications
Hispanic or Latino	584	361	61.8%	103	17.6%
American Indian or Alaska Native	9	3	33.3%	2	22.2%
Asian	0	0	-	0	-
Black or African American	65	41	63.1%	13	20.0%
Native Hawaiian or Other Pacific Islander	4	3	75.0%	0	0.0%
White	477	295	61.8%	82	17.2%
Race Unknown	29	19	65.5%	6	20.7%
Not Hispanic or Latino	3695	2584	69.9%	482	13.0%
American Indian or Alaska Native	7	5	71.4%	0	0.0%
Asian	46	30	65.2%	6	13.0%
Black or African American	393	243	61.8%	84	21.4%
Native Hawaiian or Other Pacific Islander	13	7	53.8%	3	23.1%
White	3210	2284	71.2%	382	11.9%
Race Unknown	26	15	57.7%	7	26.9%
Ethnicity/Race Unknown	1357	263	19.4%	53	3.9%
Totals	5636	3208	56.9%	638	11.3%

Source: Home Mortgage Disclosure Act (HMDA) Data

The number of applications is proportional to the percent of the race population across races, meaning there is a proportional representation of races in loan applications. However, the number of applications from Hispanic applicants is about half that of the proportion of the City’s population. Approximately 10% of home purchase loan applications were submitted by Hispanic applicants, while 20% of the City’s population is Hispanic.²⁵

²⁵ 2013-2017 HMDA, Home Purchase Applications; 2017 ACS B03003.

However, the data does indicate some discrepancies in the rates at which loans are originated across racial groups. Over 70% of applications made by White, non-Hispanic applicants result in loan origination. This figure is lower for all other races, except for Hispanic Native Hawaiian/Other Pacific Islander applicants and non-Hispanic American Indian/Alaska Native applicants. In both cases, the absolute number of homeowners are less likely to originate loans and are more frequently denied than other race groups. Hispanic Native Hawaiian/Other Pacific Islanders and non- Hispanic American Indian/Alaska Natives experience greater denial rates than others, but again, the absolute number of applications is very low. Non-Hispanic Black applicants were approved for loans approximately 62% of the time, whereas this was true for 71% of White applicants.²⁶

Table 11.1.3 shows loan information for home improvement loans in New Bedford. This data shows that existing homeowners who seek to borrow funds for home improvement projects originate loans slightly more than half of the time. Again, non-Hispanic Black and Hispanic homeowners are less likely to originate loans and are more frequently denied than other race groups. Hispanic Native Hawaiian/Other Pacific Islanders and non- Hispanic American Indian/Alaska Natives experience greater denial rates than others, however again, the absolute number of applications is very low.

Lastly, it is important to look at refinance loans. Approximately 53% of refinance applications across all racial and ethnic groups are originated, and 24% are denied. Hispanic and non-Hispanic Blacks and Native Hawaiian/Pacific Islanders all experience higher rates of denial than total denials. Note again, the absolute number of applications for American Indian/Alaska Natives and Native Hawaiian/Pacific Islanders is low. Hispanics of all races have a higher incidence of loan denial, 10 percentage points higher than the overall average.

²⁶ Ibid.

Table 11.1.3: 2013-2017 Home Improvement - New Bedford

	APPLICATIONS	ORIGINATIONS		DENIALS	
		Number	% of applications	Number	% of applications
Hispanic or Latino	143	63	44.1%	50	35.0%
Black or African American	15	8	53.3%	6	40.0%
Native Hawaiian or Other Pacific Islander	4	0	0.0%	4	100.0%
White	113	52	46.0%	32	28.3%
Race Unknown	11	3	27.3%	8	72.7%
Not Hispanic or Latino	2,137	1,254	58.7%	527	24.7%
American Indian or Alaska Native	9	3	33.3%	4	44.4%
Asian	14	9	64.3%	3	21.4%
Black or African American	148	67	45.3%	58	39.2%
Native Hawaiian or Other Pacific Islander	8	5	62.5%	3	37.5%
White	1,927	1,159	60.1%	449	23.3%
Race Unknown	31	11	35.5%	10	32.3%
Ethnicity/Race Unknown	491	163	33.2%	94	19.1%
Totals	2,771	1,480	53.4%	671	24.2%

Source: Home Mortgage Disclosure Act (HMDA) Data

Table 11.1.4: 2013-2017 Refinance - New Bedford

	APPLICATIONS	ORIGINATIONS		DENIALS	
		Number	% of applications	Number	% of applications
Hispanic or Latino	143	63	44.1%	50	35.0%
Black or African American	15	8	53.3%	6	40.0%
Native Hawaiian or Other Pacific Islander	4	0	0.0%	4	100.0%
White	113	52	46.0%	32	28.3%
Race Unknown	11	3	27.3%	8	72.7%
Not Hispanic or Latino	2,137	1,254	58.7%	527	24.7%
American Indian or Alaska Native	9	3	33.3%	4	44.4%
Asian	14	9	64.3%	3	21.4%
Black or African American	148	67	45.3%	58	39.2%
Native Hawaiian or Other Pacific Islander	8	5	62.5%	3	37.5%
White	1,927	1,159	60.1%	449	23.3%
Race Unknown	31	11	35.5%	10	32.3%
Ethnicity/Race Unknown	491	163	33.2%	94	19.1%
Totals	2,771	1,480	53.4%	671	24.2%

Source: Home Mortgage Disclosure Act (HMDA) Data

Table 11.1.5 shows home purchase application and denial rates for different census tracts in the City. Shaded rows indicate tracts where the denial rate exceeds the citywide average by at least five percentage points. All of these tracts have a higher proportion of people of color than the citywide average. It cannot be concluded that the loans were denied because they were for property in high minority tracts. There are several other tracts in the City that have a higher proportion of people of color than the citywide average but have denial rates on par with the rest of the City. However, it is important to note that three of the tracts with high denial rates are Racially and Ethnically Concentrated Areas of Poverty (RECAPs).

As noted by responses to the City's survey, homeownership assistance, including down payment assistance and low-interest loans, were ranked as high needs. The City operates the following:

- Neighborhood First Program -This HOME funded program offers Down Payment, Closing Cost, GAP and Rehabilitation Assistance to help enable income-eligible applicants to purchase their first homes.
- Financial Assistance Program -This CDBG-funded loan program is designed to provide low and moderate-income households with financial and technical assistance to make necessary property repairs and to comply with Minimum Housing Quality Standards.
- Housing Accessibility Program -This CDBG Funded Grant Program is designed to assist income-eligible property owners with physical disabilities by providing financial and technical assistance to remove or alter architectural barriers and make the home accessible.
- Emergency Repair Program -This CDBG-funded grant is designed to assist income-eligible households alleviate dangerous, hazardous, and/or unsanitary conditions.

Table 11.1.5: Home Purchase Loans by Census Tract 2013-2017				
Census Tract	Loan Applications	Loan Origination Rate	Denial Rate	% Minority
6501.01	589	62.8%	8.1%	8.3%
6501.02	446	62.1%	9.9%	25.1%
6502.01	345	56.8%	6.4%	10.3%
6502.02	215	62.3%	5.1%	14.2%
6503	265	60.0%	8.7%	14.6%
6504	182	52.2%	14.8%	19.0%
6505	176	60.8%	9.7%	19.3%
6506	71	53.5%	14.1%	31.2%
6507	67	52.2%	17.9%	61.0%
6508	166	51.8%	11.4%	39.6%
6509*	140	50.7%	10.0%	57.2%
6510.01	236	56.8%	9.3%	20.5%
6510.02	352	58.8%	6.8%	31.0%
6511	257	54.9%	11.3%	42.2%
6512*	52	55.8%	21.2%	46.8%
6513	100	52.0%	13.0%	43.0%
6514	233	52.8%	13.7%	42.0%
6515	238	52.5%	10.5%	51.5%
6516	364	54.4%	11.0%	40.1%
6517*	99	50.5%	17.2%	57.7%
6518	45	62.2%	13.3%	38.9%
6519*	46	47.8	21.7%	74.3%
6520	174	52.3%	12.6%	35.8%
6521	238	63.0%	8.0%	23.5%
6522	254	62.2%	2.8%	13.4%
6523	176	53.4%	12.5%	26.3%
6524	138	52.9%	14.5%	25.9%
6525	107	52.3%	15.9%	38.9%
6526	90	51.1%	18.9%	56.1%
6527	157	53.5%	12.1%	43.5%
6528	290	59.0%	9.7%	10.8%
Grand Total	6,308	57.1%	10.3%	31.7%

Source: 2013-2017 HMDA Data

* Denotes RECAP

Shading denotes tracts where loan denials are more than 5 percentage points greater than citywide rate.

EDUCATION

New Bedford residents tend to be less educated than regional and statewide peers. Over 10,000, or 17.3%, of residents over 25 years of age have an 8th-grade education or less. An additional 22,000 people have only completed 12th grade, the vast majority of whom graduated with a diploma or GED. As seen in Table 11.2.1, 12% of residents have a bachelor’s degree, and less than 7% have a master’s degree. Approximately 15,000 residents have an associate’s degree or have completed some college. However, based on ACS 2010 estimates, this figure has increased by 26%, or 3,268 people, in seven years. In comparison, 31.7% of Bristol County residents over 25 years of age have graduated high school, and 18% of residents have a bachelor’s degree. New Bedford’s residents are significantly less educated than other state residents. Table 11.2.2 compares New Bedford’s MCAS Achievement to those of other Southeastern communities.

Map 12 shows school proficiency in New Bedford and the region. The shading indicates school proficiency based on data collected from HUD E-GIS. The School Proficiency Index indicates the schools' percentile ranking in that area, with darker colors indicating stronger performing schools. When comparing the data, New Bedford has a high percentage of families with children, and its schools are primarily within the 20th to 30th percentile for proficiency.

Table 11.2.1: Educational Attainment for Population 25 Years and Over						
	New Bedford		Bristol County		Massachusetts	
	#	%	#	%	#	%
8th Grade or Less	10,323	17.3%	32,103	8.8%	216,649	4.8%
12th Grade, No Diploma	1,287	2.2%	6,018	1.6%	67,574	1.5%
High School Diploma/GED	21,013	35.2%	115,589	31.7%	1,162,683	25.7%
Some College, No Degree	11,088	18.6%	69,876	19.2%	741,582	16.4%
Associate's Degree	4,898	8.2%	35,387	9.7%	363,330	8.0%
Bachelor's Degree	7,300	12.2%	66,555	18.2%	1,101,605	24.3%
Master's/Professional Degree & Above	3,797	6.4%	39,283	10.8%	879,256	19.4%

Source: 2017 ACS B15003

Map 12: School Proficiency Index

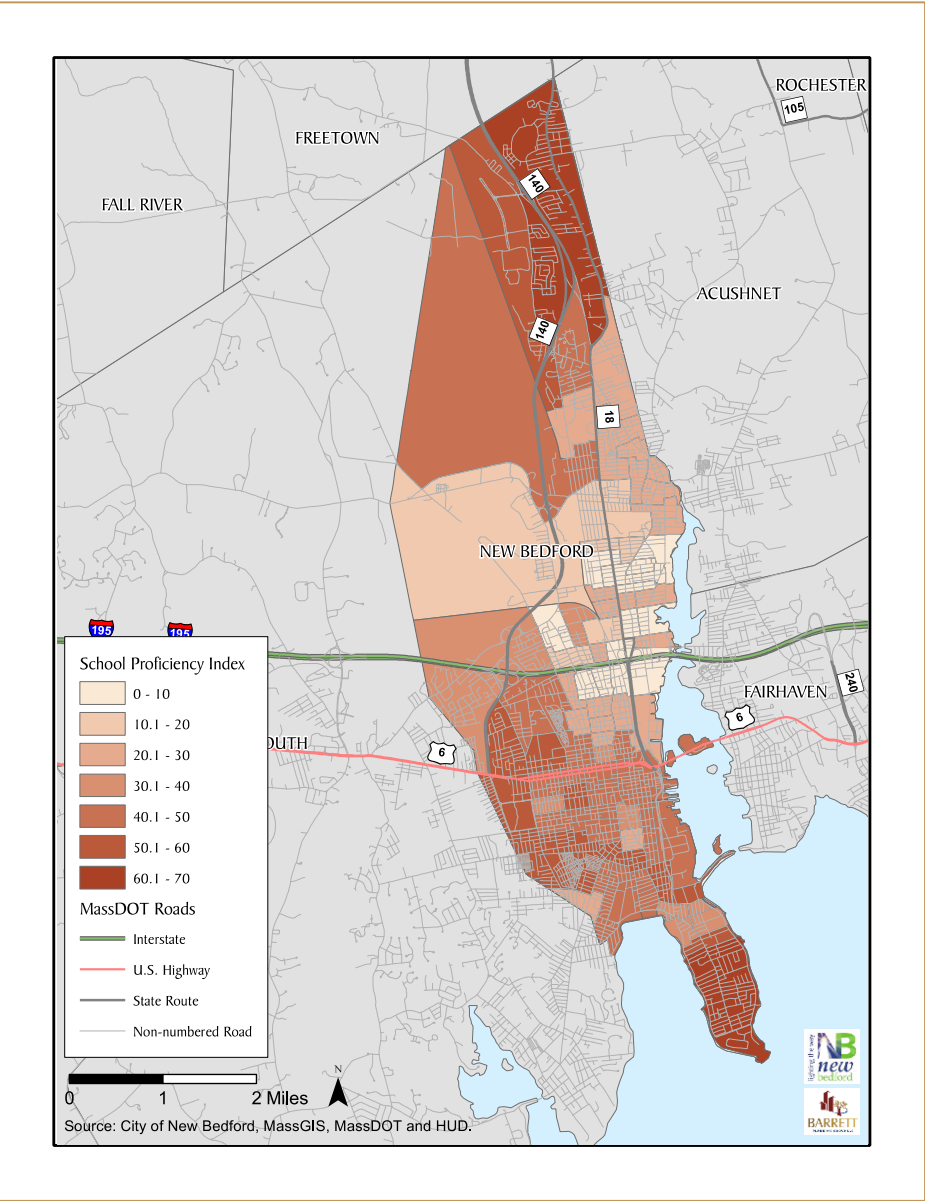


Table 11.2.2: Next Generation MCAS Achievement By District (Grades 03-08)			
2019	Subject	Avg. Scaled Score	SGP
Acushnet	ELA	503.2	51.6
	MATH	501.8	57.0
Dartmouth	ELA	505.5	56.4
	MATH	501.3	53.0
Fairhaven	ELA	501.3	44.3
	MATH	501.1	54.1
Fall River	ELA	490.9	46.8
	MATH	489.6	46.8
Freetown-Lakeville	ELA	501.4	44.9
	MATH	500.3	42.7
Marion	ELA	505.7	38.7
	MATH	506.3	45.4
Mattapoisett	ELA	514.3	62.5
	MATH	510.2	60.3
New Bedford	ELA	491.2	43.7
	MATH	489.5	42.5
Rochester	ELA	504.5	54.2
	MATH	501.8	56.1
Westport	ELA	500.9	48.7
	MATH	501.3	50.9
Statewide	ELA	501.2	49.9
	MATH	499.2	49.9

Source: MA Department of Education, Statewide Assessment Reports, retrieved 3-29-2020.

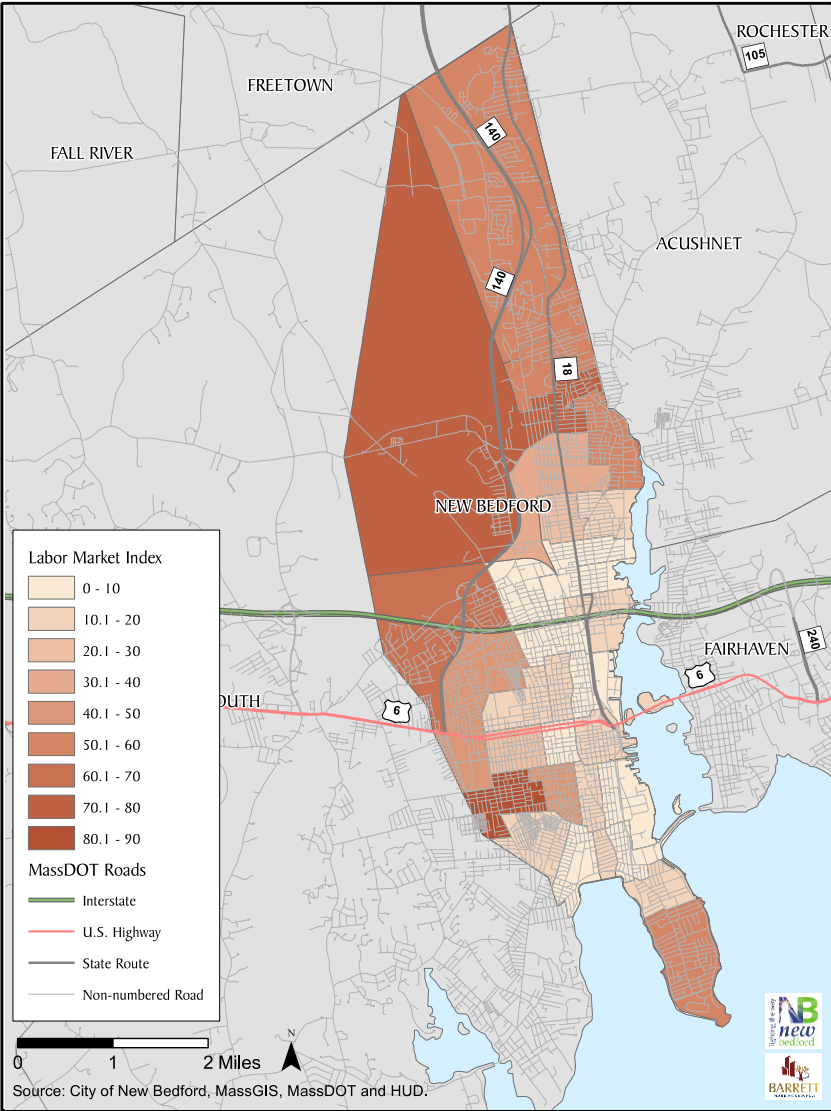
EMPLOYMENT

Although New Bedford and the surrounding region have historically relied on manufacturing industries, such as fishing and textiles to a significant degree, data from the state’s Executive Office of Labor and Workforce Development (EOLWD) shows that the following sectors now employ New Bedford residents: Education and Health Care Services; Manufacturing; Retail; and Arts, Entertainment and Accommodations. As Table 11.3.1 outlines, New Bedford not only offers employment in these sectors, but people are coming to New Bedford to work.

Table 11.3.1: Business Activity – New Bedford					
Business by Sector	# Workers	# Jobs	% Share-Workers	% Share-Jobs	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	444	1,005	1.2%	2.8%	1.5%
Arts, Entertainment, Accommodations	4,594	3,498	12.8%	8.5%	-4.3%
Construction	2,163	1,189	6.0%	3.3%	-2.8%
Education and Health Care Services	10,226	12,674	28.5%	34.9%	6.4%
Finance, Insurance, and Real Estate	1,381	1,044	3.8%	2.9%	-1.0%
Information	501	181	1.4%	0.5%	-0.9%
Manufacturing	5,411	6,410	15.1%	17.6%	2.6%
Other Services	1,399	1,510	3.9%	4.2%	0.3%
Professional, Scientific, Management Services	2,124	686	5.9%	1.9%	-4.0%
Public Administration	0	1,972	0.0%	5.4%	5.4%
Retail Trade	4,775	3,144	13.3%	8.7%	-4.6%
Transportation & Warehousing	1,324	1,911	3.7%	5.3%	1.6%
Wholesale Trade	1,545	1,517	4.3%	4.2%	-0.1%
Grand Total	35,887	36,741	100.0%	100.0%	0.0%

Source: New Bedford 2020-2024 Consolidated Plan, Economic Development Market Analysis

Map 13: Labor Market Index



Map 13 shows *the Labor Market Engagement Index* for the region.²⁷ The index indicates the national ranking by percentile of the City’s and region’s labor force participation rate, meaning the proportion of the population working and the human capital in the area. As the map shows, New Bedford has lower labor market engagement levels than the surrounding towns. Much of the City is ranked in the bottom 20th percentile. This is not surprising given the comparatively low educational attainment levels and high levels of unemployment in the City.

Map 14 shows *the Job Proximity Index* for the region.²⁸ The shading on the map indicates the percentile rank within the Core Based Statistical Area (CBSA) for access to jobs. Darker shading (higher figures) suggests that jobs are easily accessible to this area. As illustrated in the map, much of the Greater New Bedford region, including New Bedford, has low job proximity, i.e., jobs are not easily accessible from these areas.

As discussed in the upcoming transportation section, transportation to job sites is a concern in New Bedford. The Southeastern Regional Transit Authority (SRTA) bus network is the only major public transportation offered. Therefore, job access is dependent on SRTA’s routes and schedules.

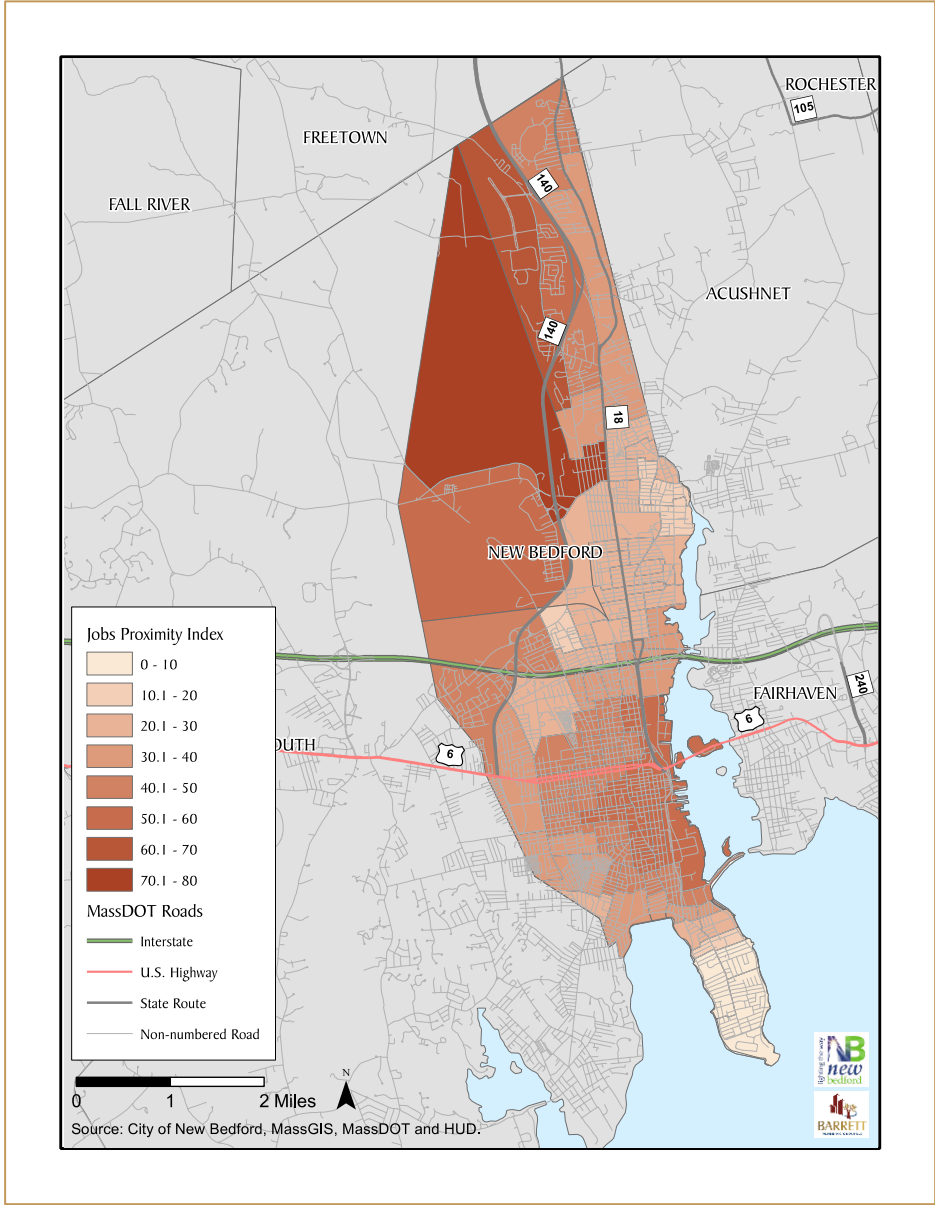
UMASS Center for Public Policy published a report in August 2019 titled *The Economic Geography of South Coastal New England*. The report also details the region’s potential to establish itself as a leader in offshore wind energy, marine-related industries, and medical device manufacturing. Expansion of these industries and the Commuter Rail to New Bedford will reshape the area’s job market and, likely, its labor force. There will be an increased need for a labor market that can support high-tech jobs.²⁹

²⁷ The Labor Market Engagement Index summarizes the relative intensity of labor market engagement and human capital in a neighborhood. HUD bases the index on the level of employment, labor force participation, and educational attainment in a census tract.

²⁸ The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily.

²⁹ Rapoza, Goodman, Borges, Stickles, and Mattos, “The Economic Geography of South Coastal New England,” UMASS Public Policy Center, August 2019, I.

Map 14: Jobs Proximity Index



Whether workers will come from outside the area to fill these jobs or whether New Bedford residents will attain the education and skills to fill them remains to be seen. Regardless, the region's economic push toward industries requiring highly-educated and skilled workers, as well as better access to the Greater Boston job center, could shift New Bedford's housing market dramatically and put displacement pressures on many City residents.



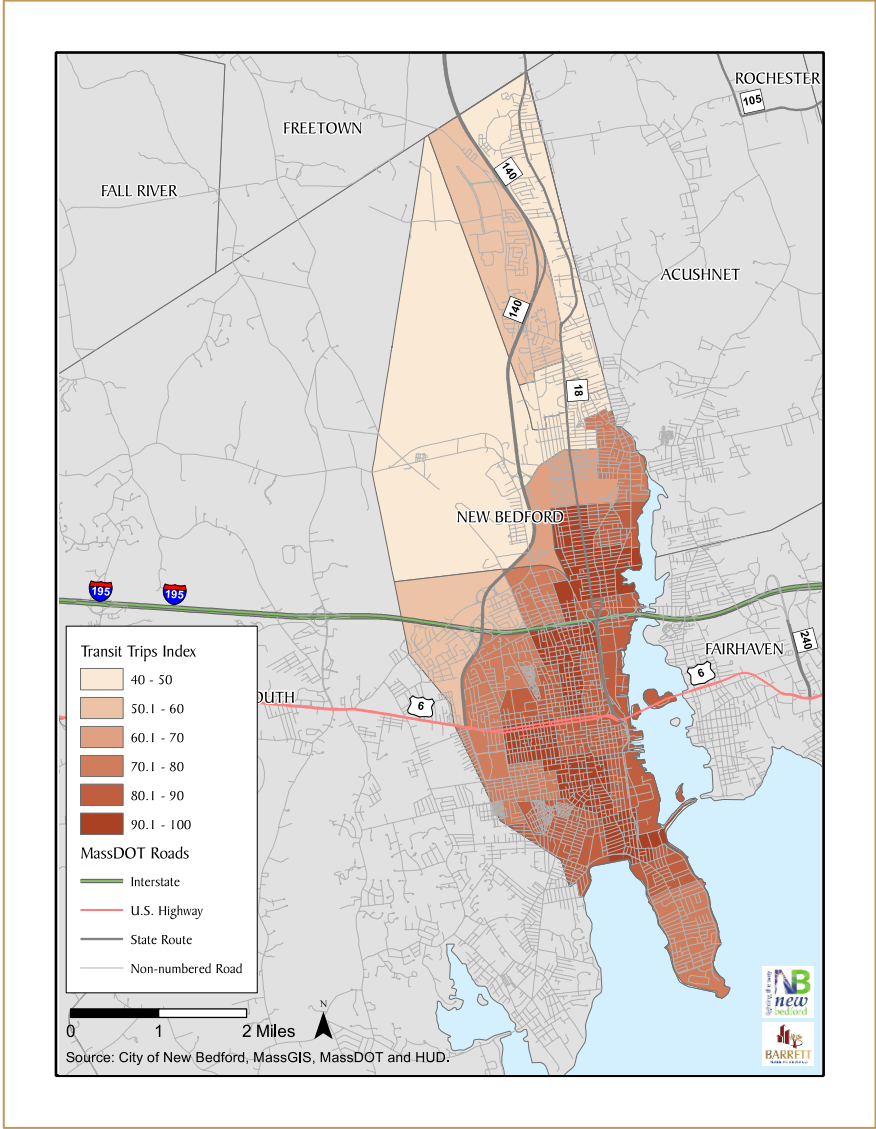
TRANSPORTATION

Public transit in the Greater New Bedford region is limited. The Southeastern Regional Transit Authority (SRTA) runs a bus network in New Bedford and Fall River and has connecting travel between Fall River, New Bedford, Fairhaven, and Wareham. The bus lines connect the major shopping areas in the region (Swansea Mall, Dartmouth Mall, and Huttleston Ave in Fairhaven). Map 15 Transit Trips Index shows a significant dependency on public transit in New Bedford. These rates are comparatively low-to-moderate transit usage compared to the north region, which is serviced by the MBTA Commuter Rail.³⁰ Map 15 *Low Transportation Cost Index* shows residents in New Bedford have lower transportation costs as they have some public transit options and are less likely to be strictly car-dependent.³¹

DATTCO Motorcoach offers commuter bus service to Boston, operating several trips a day connecting Fairhaven, the New Bedford Bus Terminal, the Mt. Pleasant Park & Ride, and UMASS Dartmouth with the Galleria Mall in Taunton and South Station in Boston. All buses operated by SRTA and DATTCO are accessible to people using wheelchairs.

Much of the Greater New Bedford region is car dependent. Limited bus schedules - sometimes operating only within commute hours - and the latest regional service running only until 9 p.m. makes it difficult for residents to rely on public transportation to access jobs that operate outside these hours, such as shift work. Weekend schedules are even more limited, so for people who work over the weekend, a car is necessary transportation.

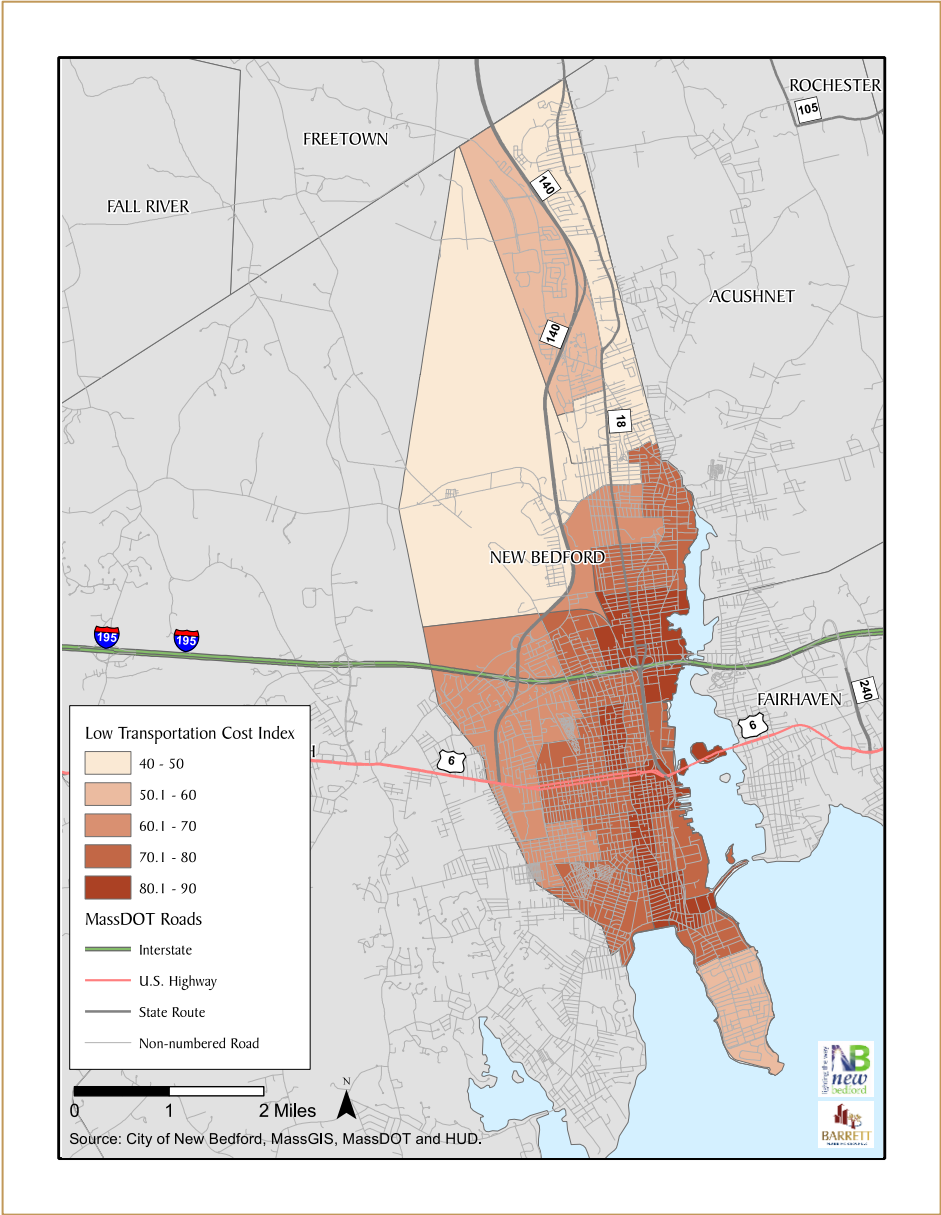
Map 15: Transit Trips Index



³⁰ The Transit Trip Index, or Location Affordability Index (LAI), estimates the percentage of a family’s income dedicated to the combined cost of housing and transportation in a given location. Users can choose among a diverse set of family profiles—which vary by household income, size, and the number of commuters—and see the affordability landscape for each in a given neighborhood, city, or region.

³¹ The Low Transportation Cost Index is based on estimates of transportation expenses for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e., CBSA). The estimates come from the Location Affordability Index (LAI).

Map 16: Low Transportation Cost Index



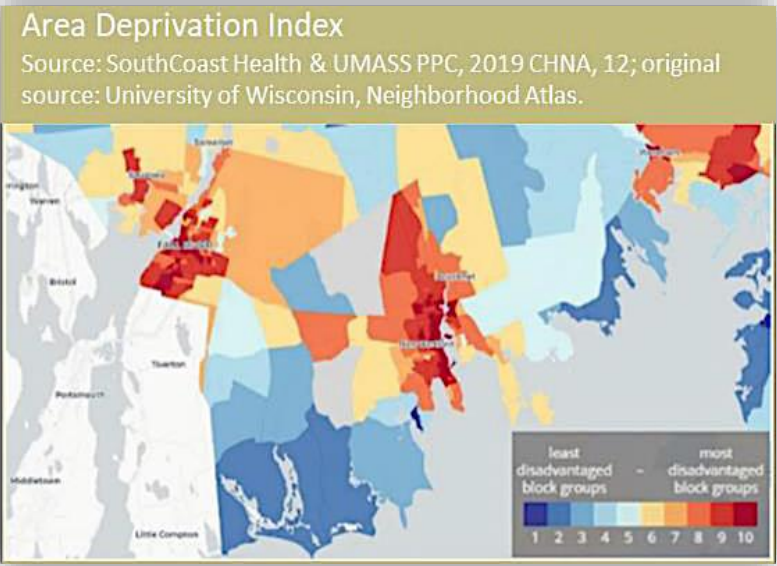
ENVIRONMENT

People’s health is affected by their home and work environments. In addition to concerns like lead-based paint exposure in the home, factors such as air quality, water quality, and environmental conditions greatly impact people’s health.

Every three years SouthCoast Health, a non-profit community-based health system, and the UMASS Dartmouth Public Policy Center conduct a Community Health Needs Assessment (CHNA). This report evaluates health outcomes and equity across the region and identifies areas to target efforts for the next few years. Key findings from this report indicate there are great disparities in health across the region. These disparities are influenced by income, education and race, and other socio-economic factors.

Map 17 shows the Area Deprivation Index (ADI), as illustrated in the 2019 CHNA.³² The U.S. Health Resources and Services Administration established this index. They combine 17 indicators to measure social vulnerability, including income, employment, education, and housing conditions. Social vulnerability is linked to poor health outcomes, i.e., the greater one’s social vulnerability, the more

Map 17: Area Deprivation Index



³² SouthCoast Health & UMASS Dartmouth Public Policy Center, “Community Health Needs Assessment,” 2019, 12. The original source for the map is the University of Wisconsin’s Neighborhood Atlas.

likely one will have health issues. This map shows that New Bedford has several block groups that are highly disadvantaged regarding community health outcomes. Not surprisingly, several of these areas overlap with the City’s Racially and Ethnically Concentrated Areas of Poverty (RECAPs), though disadvantaged areas are certainly not exclusively in RECAPs.

Map 18 Environmental Health and RECAPs offers a closer look at the City’s environmental health across the areas of the City. The higher values (darker areas) indicate lower exposure to toxins harmful to human health. These include carcinogenic, respiratory, and neurological hazards. Tracts in the core of the City and bordering the harbor tend to have higher exposure to toxins.

In New Bedford, as reported in the CHNA, 28 of the state’s brownfield sites are located in New Bedford and two Superfund sites: Sullivan’s Ledge and New Bedford Harbor. Sullivan’s Ledge, a former quarry where local industry dumped hazardous waste, has been capped and now serves as a solar farm. Years of dumping into the harbor have created high levels of PCBs and heavy metals. The EPA has been cleaning the site for years. They are working out from the inner harbor to its outer shores.³³

The CHNA reports that the incidence of childhood lead poisoning in New Bedford dropped between 2010-2017. However, there have been increases in the number of children with asthma during the same period. In 2010, the prevalence of pediatric asthma was 14.9 cases per 100 children. In 2017, that number had risen to 18.9 cases per 100 children. Over the years, New Bedford’s incidence of childhood asthma has been slightly lower than Fall River’s, but both cities have consistently higher rates than the surrounding region.³⁴

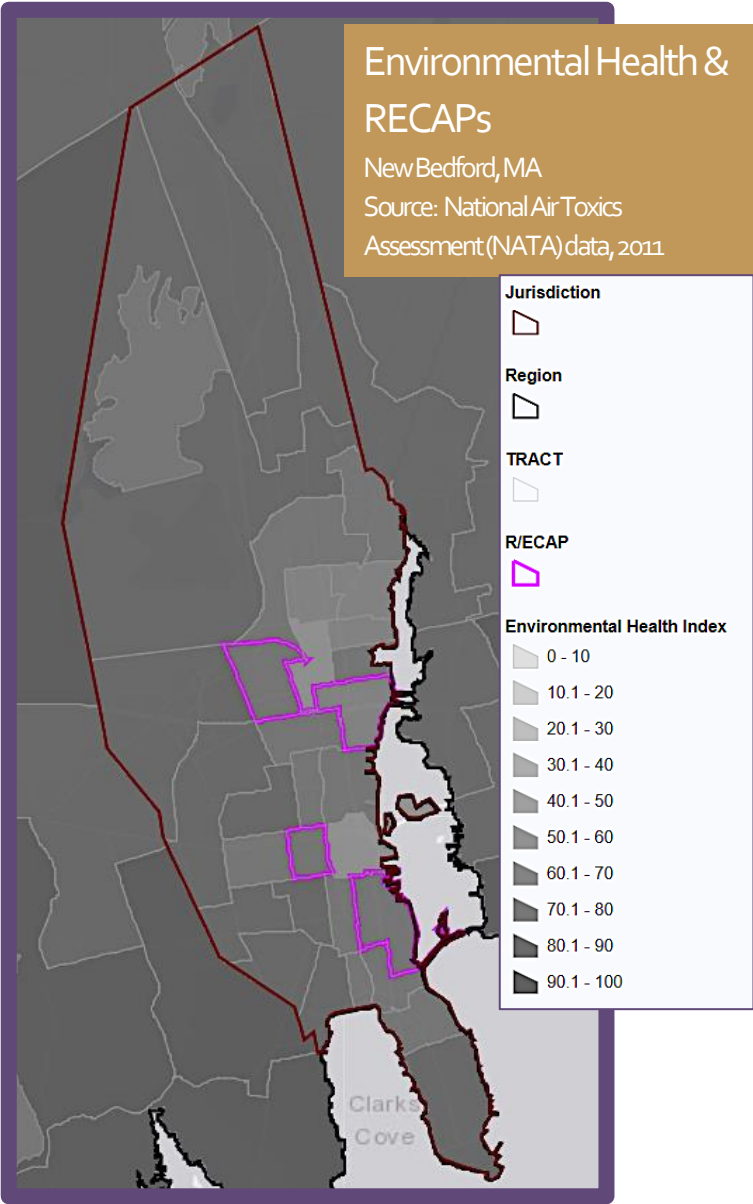
In addition to environmental contaminants, it is important to consider residents’ access to nutritious food and healthcare. Stakeholders and residents interviewed for the CHNA reported that it is difficult for many to access healthcare and fresh produce in the City. The cost and limited bus transportation schedules impair people’s access to health services, and many

³³ U.S. Environmental Protection Agency, www.epa.gov, retrieved 4/1/2020.

³⁴ 2019 CHNA, 86-87.

Map 18: Environmental Health and RECAPs

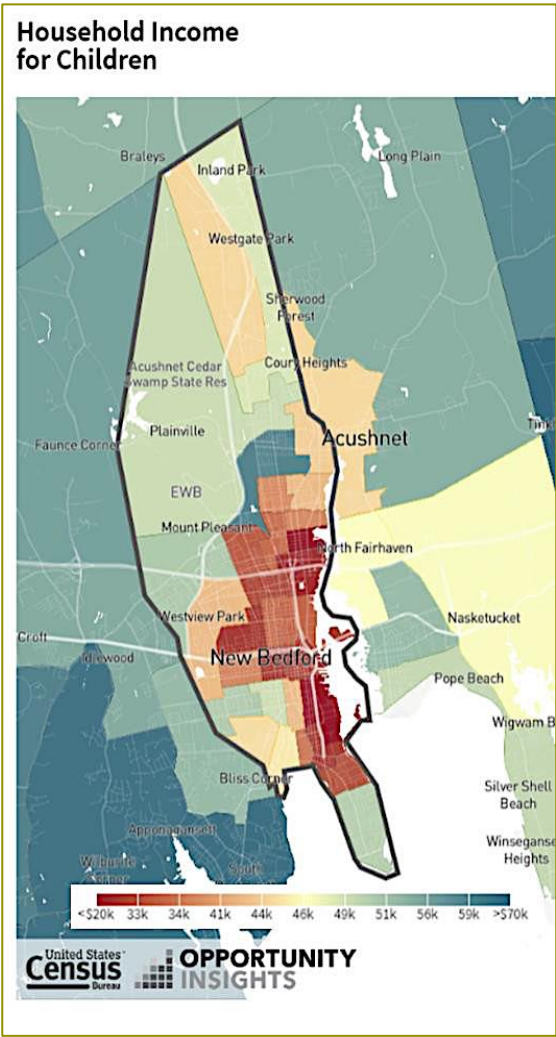
Environmental Health and neighborhoods do not have direct access to a supermarket. While farmer’s markets are expanding access to fresh food into neighborhoods, many residents find the cost of produce prohibitive.³⁵



³⁵ 2019 CHNA, iv

LOW POVERTY

Map 19: Household Income for Children

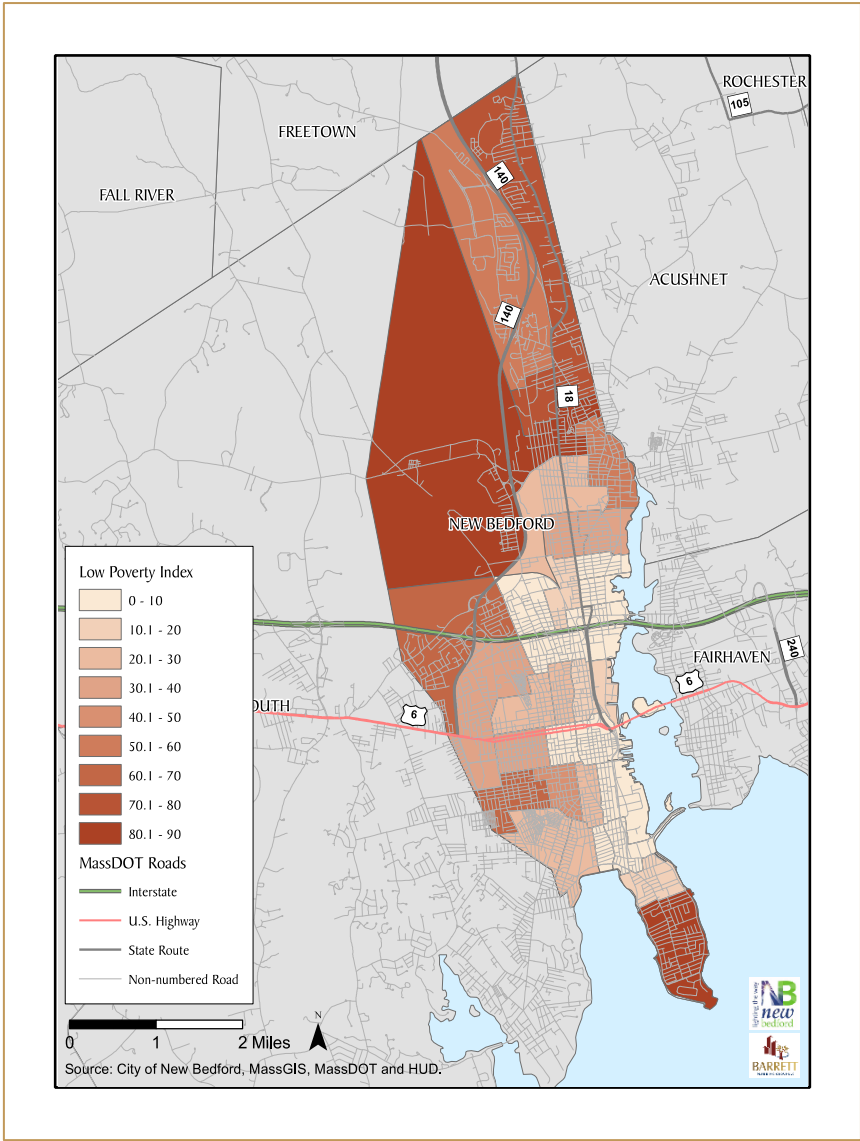


Studies have shown that living in low-poverty neighborhoods can be transformative for children, improving economic and health outcomes as adults. As stated on the Opportunity Insights website of Harvard University’s economist Raj Chetty, “... neighborhoods affect children’s long-term outcomes through *childhood exposure effects*: every extra year a child spends growing up in an area with better outcomes ... causes the child to have better outcomes in adulthood.”³⁶

The *Household Income for Children* map taken from the Opportunity Atlas shows the earning potential for children growing up in New Bedford’s neighborhoods. The dark red areas indicate that future household incomes for these children are likely to be extremely low. Whereas children growing up in blue shaded areas are likely to have high incomes upon adulthood. As the map indicates, children growing up in the surrounding region are likely to have higher incomes than those growing up in New Bedford.

As described previously, New Bedford has more people of color and greater levels of poverty than the surrounding region. There are

Map 20: Low Poverty Index



variations in wealth across the City, with the central core being home to its poorest residents.

Map 20 Low Poverty Index shows local levels of wealth and the relative poverty of the City.³⁷ Dark shading indicates a low incidence of poverty, and light shading indicates a high poverty area.

³⁶ Opportunity Insights webpage, Harvard University, <https://opportunityinsights.org/neighborhoods/>, retrieved 4-2-2020.

³⁷ The low poverty index captures poverty in a given neighborhood. The index is based on the poverty rate.

OPPORTUNITY BY RACE AND ETHNICITY

Table 11.7.1 Opportunity Indicators by Race/Ethnicity shows the distribution of the indices described in the previous section across races and ethnicities. The data indicate disparities in access to opportunity across people of different races and ethnicities in New Bedford, and Hispanics, Blacks, and Native Americans tend to have the least access to opportunity compared to other population groups.

Hispanics, Blacks and Native Americans live in higher poverty areas, attend schools with lower proficiency, and adults are less likely to be employed. They are also more likely to be dependent on transit and must travel farther to reach jobs. All races and ethnicities had approximately the same level of transportation costs and exposure to environmental hazards. These racial and ethnic disparities in access to opportunity hold true for New Bedford residents living below the federal poverty line, with some exceptions. For example, Native Americans living below the poverty line have better access to proficient schools and jobs and are less exposed to environmental hazards than other groups.

Table 11.7.1 also shows disparities in access to opportunity across races and ethnicities in the region; the same patterns of disparity in access to opportunity exist regionally. Hispanics, Blacks, Asians, and Native Americans have less access to opportunity than Whites to varying degrees. Black and Hispanic populations have the least access to opportunity among people of color. These patterns are exacerbated for people of all races and ethnicities living below the poverty line, especially for people of color.

Table 11.7.1: Opportunity Indicators, by Race/Ethnicity							
(New Bedford, MA CDBG, HOME, ESG) Jurisdiction							
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	36.86	25.11	34.00	56.93	93.41	7.81	76.29
Black, Non-Hispanic	22.52	22.19	22.32	61.17	95.38	9.31	74.93
Hispanic	19.06	18.72	19.20	61.88	95.58	9.27	74.28
Asian or Pacific Islander, Non-Hispanic	33.55	24.73	33.41	54.93	93.36	7.71	76.24
Native American, Non-Hispanic	21.68	19.66	23.03	59.85	95.19	8.91	73.93
Population Below Federal Poverty Line							
White, Non-Hispanic	22.64	21.01	21.34	61.49	95.47	9.02	74.03
Black, Non-Hispanic	15.53	18.29	18.31	61.35	95.96	8.85	73.72
Hispanic	13.30	16.95	16.76	61.72	95.89	8.99	73.96
Asian or Pacific Islander, Non-Hispanic	17.37	15.83	15.27	66.11	96.55	8.56	71.71
Native American, Non-Hispanic	19.95	30.57	16.94	64.90	96.08	10.43	79.40
(Providence-Warwick, RI-MA) Region							
Total Population							
White, Non-Hispanic	64.78	56.82	60.22	40.32	74.76	34.55	73.22
Black, Non-Hispanic	35.93	31.09	35.75	56.61	83.58	50.51	53.57
Hispanic	29.57	26.12	30.25	59.56	84.05	50.21	50.74
Asian or Pacific Islander, Non-Hispanic	52.80	44.21	51.74	49.91	79.36	51.42	60.64
Native American, Non-Hispanic	46.66	45.08	47.35	48.75	78.87	47.33	64.82
Population Below Federal Poverty Line							
White, Non-Hispanic	47.92	45.46	46.88	49.17	80.11	46.24	66.83
Black, Non-Hispanic	23.05	24.29	28.23	60.81	86.09	53.71	47.32
Hispanic	19.47	18.96	22.13	62.26	86.64	50.95	49.88
Asian or Pacific Islander, Non-Hispanic	33.39	32.38	36.05	60.25	86.25	59.45	49.45
Native American, Non-Hispanic	37.13	42.85	44.23	51.48	81.02	58.57	61.19

Source: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA
Note 1: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

12.0 Fair Housing Enforcement

FAIR HOUSING ORGANIZATIONS

New Bedford Human Relations Commission

The New Bedford Human Relations Commission is the local government entity that oversees and advocates for civil rights in the City. Nine voluntary board members comprise the Commission. The Human Relations Commission educates the public about civil rights, receives and mediates complaints, or refers them to the State for resolution. The Commission also conducts outreach to public and private organizations to educate and increase awareness on human and civil rights issues.

Contact Information: New Bedford City Hall, Room 113
Phone: 508-979-1464
Website: <https://www.newbedford-ma.gov/community-services/divisions/human-services/human-relations-commission-2/>

Massachusetts Commission Against Discrimination

The Massachusetts Commission Against Discrimination (MCAD) is the state-level agency responsible for combating discrimination in the state. MCAD investigates and prosecutes discrimination complaints that occur in the following areas: employment, housing, public places, education, lending, and credit. MCAD will help parties mediate resolutions to complaints or prosecute violators of the law as needed. MCAD is the primary enforcement agency for fair housing issues in the state. MCAD submits copies of all complaints that violate federal law to HUD..

Contact Information: 1 Ashburton Place, Suite 601, Boston, MA 02108
Phone: (617) 994-6000
Email: mcad@mass.gov
Website: <https://www.mass.gov/orgs/massachusetts-commission-against-discrimination>

SouthCoast Fair Housing

SouthCoast Fair Housing was established in 2012 to advocate for fair housing in Rhode Island and Bristol and Plymouth Counties in Massachusetts. It is the only nonprofit fair housing organization in the region. They conduct fair housing testing and enforcement with HUD's Fair Housing Initiatives Program (FHIP) funds. There are two offices in New Bedford and Pawtucket, and they have 5.5 FTE staff and a fair housing tester. The organization provides training to real estate agents and lenders and represents clients in individual cases. They work closely with South Coastal Counties Legal Services to refer and sometimes co-represent clients in complaint cases. SouthCoast Fair housing also works closely with other service providers in the region, such as the Victims' Rights Law Center, NeighborWorks Housing Solutions, Catholic Social Services (CSS), and People Acting in Community Endeavors (PACE).

Contact Information: 257 Union Street, New Bedford, MA 02740
Phone: (774) 473-9994; TTY: (800) 439-2370
Website: <http://SouthCoastfairhousing.org/>

U.S. Department of Housing and Urban Development

People can also file fair housing complaints directly with the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees lawful compliance of the Fair Housing Act. HUD's one-year statute of limitations is longer than the State's, which is 300 days. This statute may motivate some complainants to file complaints directly with HUD. However, HUD only enforces federal law, which covers fewer protected classes than the State.

Contact Information: Boston Regional Office of FHEO
U.S. Department of Housing and Urban Development
Thomas P. O'Neill Jr. Federal Building, 10 Causeway Street Room 321, Boston, MA 02222
Phone: (800) 827-5005; TTY (800) 877-8339
Email: ComplaintsOffice01@hud.gov
Website: https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint

FAIR HOUSING TESTING

Fair housing testing is one way to understand who is being discriminated against and how a community manifests discrimination. It often becomes an avenue for educating landlords and others about the Fair Housing Act and illegal acts of discrimination. With funds through the Fair Housing Initiatives Program (FHIP), SouthCoast Fair Housing has conducted testing in New Bedford and the region. The testing model usually involves a person representing a protected class (i.e., a person of color, a person with a disability, or families with children) and inquiring about a housing unit. They will then observe how they are treated and contrast that treatment with the same inquiry from a person not representing a protected class. If discrimination occurs, then the agency may file a complaint and pursue remediation. Often, remediation involves educating the offending party about the law and avoiding discriminatory practices in the future.

Testing is critically important in New Bedford as it is one of the only ways that advocates can understand the levels of discrimination in the City. People who experience discrimination are often reluctant to discuss it. As noted previously, immigrants who are unfamiliar with their rights, mistrusting the government, or afraid to speak up are unlikely to report discrimination.

DISCRIMINATION COMPLAINTS

The Massachusetts Commission Against Discrimination (MCAD) is the presiding agency over fair housing discrimination complaints in Massachusetts. A person or entity may file a complaint with MCAD if they believe they have been discriminated against in a housing transaction. MCAD will then investigate the complaint and prosecute if needed. Between 2015 and 2019, 31 parties filed complaints. Of these complaints, three were withdrawn, 11 dismissed with lack of probable cause, and the remaining 17 settled or found to have probable cause. Complaints were filed on the basis of race, national origin, disability, familial status, sexual orientation, and source of income—Table 12.1.1 breaks down the details of these cases.

Table 12.1.1: Massachusetts Commission Against Discrimination (MCAD) Complaints Filed 2015-2019			
Case No.	Basis of Complaints	Discriminatory Actions	Result
2015 – 12 Complaints Filed			
15-NPR-00082	Familial Status; Presence of Children; Lead Paint	Advertised property in a discriminatory manner	Settled
15NPR00088	Disability	Denial and/or unreasonable delay of reasonable accommodation; Offering different terms, conditions, or privileges through its failure to show available housing on the basis of disability	Dismissed – lack of probable cause
15-NPR-00233	Public Assistance	Advertised property in a discriminatory manner	Settled
15NPR00232	Public Assistance	Advertised property in a discriminatory manner	Settled
15-NPR-00285	Public Assistance	Advertised property in a discriminatory manner	Settled
15-NPR-0033	Public Assistance	Advertised property in a discriminatory manner	Settled
15NPR00570	Sex and Race	N/A	Withdrawn
15NPR01806	Sexual Orientation	Harassment by staff and other residents	Dismissed – lack of probable cause
15NPR01829	Disability	N/A	Withdrawn
15NPR03225	Disability	Harassment	Withdrawn
15NPR00286	Familial Status; Presence of Children; Lead Paint; Public Assistance	Refused to rent or lease an apartment; Gave different terms, conditions or privileges related to housing; Failed to show all available housing; Advertised property in a discriminatory manner	Settled
15NPR01595	National Origin, Race and Color	Notice to Evict/Transfer	Probable Cause
2016 – 3 Complaints Filed			
16NPR01518	Disability	Refused to rent because of service dog	Probable Cause/ Settled
16NPR02624	Familial status; Presence of children; Lead paint; Public Assistance	Refused to rent or lease an apartment; Gave different terms, conditions, privileges related to housing; Made discriminatory statements; Advertised property in a discriminatory manner	Settled
16NPR03020	Familial status; Presence of children	Discriminatory statements and actions	Probable Cause
2017 – 8 Complaints Filed			
17NPR00728	Disability; Race; Color	Notice to Vacate for Possession	Settled
17NPR00889	National Origin	Discriminatory statements; Coercion; Harassment	Dismissed - lack of probable
17NPH00817	National Origin Disability	Harassment	Dismissed - lack of probable
17NPH00878	National Origin; Disability	Complaints and calls were ignored	Dismissed - lack of probable
17NPR01735	Race; Color	Harassment; Retaliation for complaint to public health dept	Dismissed - lack of probable
17NPR01779	Disability	Failed to expedite application for assistance due to disability	Dismissed - lack of probable
17NPR03263	Public Assistance	Refused to rent unit	N/A
17NPR03264	Public Assistance	Refused to rent unit	Probable Cause/Settled
2018 – 8 Complaints Filed			
18NPR00017	Race, Color, Black (non-Hispanic)	Retaliation	Dismissed - lack of probable cause
18NPR00130	Race, Color, Black (non-Hispanic)	Notice to Terminate Tenant at Will Agreement	Dismissed - lack of probable cause
18NPR00325	Sexual Orientation; Race; Color, Black (non-Hispanic)	Failure to execute lease	Dismissed - lack of probable cause
18NPR00336	Disability	Denial of reasonable accommodation	Probable Cause/Settled
18NPR00537	Sexual Orientation; Race; Color, Black (non-Hispanic)	Failure to execute lease	Dismissed - lack of probable cause
18NPR02209	Public Assistance	Refused to rent an apartment, Failed to show all available housing; Advertised property in a discriminatory manner	Settled
18BPR03530	Public Assistance	Refused to rent or lease an apartment, Advertised property in a discriminatory manner	Settled
18BPR03669	Familial Status; Presence of Children, Public Assistance	Refused to rent or lease an apartment, Advertised property in discriminatory manner	Settled
2019 - 0 Complaints Filed			

Source: MCAD, Records Access Officer, Public Records Request #19-616

13.0 Impediments to Fair Housing Choice

The City identifies the following impediments to fair housing choice in New Bedford:

Location and Type of Affordable Housing

As described throughout this report, New Bedford's affordable housing comes in many forms: publicly supported housing of various types, voucher usage, and market-rate housing in poor condition. For the most part, affordable housing is in the central part of the City. The location of housing in this area limits people's ability to access higher proficiency schools, low-poverty neighborhoods, and amenities such as grocery stores. n the central part of the City. The housing stock is old and dense, with most units in triple-decker style homes. Built as worker housing for the City’s manufacturing industries, the structures are elevated above street level, so even first-floor units are inaccessible to people with mobility impairments.

Prevalence of Substandard Housing

Much of New Bedford's housing, especially in the City's core, is in substandard condition. Absentee landlords defer maintenance and forgo needed repairs to structures, while tenants are reluctant to complain. As the City usually only enforces building codes upon those receiving complaints, many units are not cited despite extremely poor conditions. Tenants occupying these units are often undocumented, have very low incomes, and have no other choice than to accept often derelict and unsanitary conditions.

Refusal of some Landlords to accept Section 8 Housing Vouchers

As fair housing testing shows, voucher holders often face discrimination from potential landlords when seeking housing. The source of this discrimination is the landlord’s reluctance to make repairs to and de-lead properties to pass Housing Quality Standards (HQS) inspections, which are required when a tenant uses a housing voucher. Since there is a great need for affordably priced housing in New Bedford, landlords can easily find other tenants to rent to those who do not hold vouchers. As demand increases, voucher holders will likely have an even more difficult time finding housing.

Displacement of Residents Due To Economic Pressures

New Bedford's lower-income residents are at risk of being displaced by people moving to the City as it becomes more accessible to the Boston job market and attracts new industries. The

extension of the SouthCoast Rail to New Bedford will make commuting to Boston easier and faster, allowing people living in New Bedford to access jobs in the Boston market. People are struggling to afford housing in the Boston metro area and have moved to the commuter rail lines' reaches. With the rail extension to New Bedford, the south coast will be more attractive to people searching for more affordable housing. The City is also looking to attract industries that require highly skilled workers, such as offshore wind energy and medical device manufacturing. These industries are likely to draw people to the area and increase the demand for housing.

Lack of Regional Cooperation

New Bedford is one of two cities in the south coast region that supplies publicly supported housing. Regional towns have a low share of subsidized housing, many with far less than their “fair share” of 10% affordable units. While the Southeastern Regional Planning and Economic Development District facilitates regional efforts, the region has yet to complete a regional housing strategy, leaving each community on its own to address affordable housing within the confines of its boundaries. As the south coast prepares for growth and increased housing demand, a regional strategy must address existing and anticipated fair housing issues.

Zoning and Lack of Developable Land

New Bedford has limited developable land available for new housing development, which increases housing costs and impedes the development of additional affordable housing. Zoning provisions further exacerbate the lack of available land by creating obstacles to infill development. Zoning requires a lot size of 8,000 sq. ft. for by-right development. Many lots created through the demolition of defunct housing are less than 8,000 sq. ft. and require special permits for redevelopment, increasing the time and money needed to do so.

Imbalance Between Rental and Homeownership Units

New Bedford has a high proportion of rental housing compared to homeownership units. This is especially true in neighborhoods where many recent immigrants and people of color live. A high prevalence of rental housing in a neighborhood may make it difficult for those who would like to

buy property to do so, as lenders may be less willing to lend in areas where there are high levels of renter-occupied property.

Lack of Awareness of Fair Housing Rights

Across populations, many are unaware of their fair housing rights, particularly recent immigrants and people who may not have access to fair housing information in their native language. Some landlords also are unaware of fair housing laws, as demonstrated by fair housing complaints filed with the Massachusetts Commission Against Discrimination (MCAD).

Deteriorated and Abandoned Property

New Bedford has a high number of deteriorated and abandoned properties, and many are in neighborhoods where a high proportion of people of color live. These properties range from old industrial buildings that are fully or partially vacant, to poorly maintained and abandoned housing units. These properties negatively impact the surrounding neighborhood by signaling disinvestment, presenting hazards to the neighborhood’s residents’ safety and health, and creating areas that may attract criminal activity. The existence of deteriorated and abandoned property in neighborhoods decreases property values and limits homeowners’ abilities to grow equity in their homes.

Lack of Affordable Housing in a Range of Unit Sizes

There are few small rental and ownership units in New Bedford, as most housing units have two or more bedrooms, and many have over three bedrooms. This causes many households who would otherwise be well-situated in one or two-bedroom units to be over-housed, thereby decreasing the supply of larger units for households who may need them.

Lack of Information Available in Multiple Languages

As the data show, New Bedford is becoming increasingly diverse, and there is a great need for information to be presented in multiple languages. Information on housing and fair housing rights must be presented in multiple languages and formats to educate residents. New Bedford has several service providers that work specifically with immigrants. These agencies are a great resource to these populations. They can help overcome language and cultural barriers that impede the City’s ability to communicate with and provide immigrant residents services.

Lack of Organizational Effectiveness

New Bedford’s fair housing, tenant advocacy, and civil rights support groups were quoted as being limited in bandwidth and availability, and therefore, effectiveness. Existing organizations are overwhelmed with the current workload and need; there are not enough groups servicing the area. There is also a growing need for professional trainings on housing rights for municipal staff, nonprofits, and residents. With limited options, residents must address housing issues independently while not equipped with the proper knowledge. This presents several challenges, particularly for those with Limited English Proficiency and those with disabilities. Increased housing demand, a large percentage of minorities, and lack of support services will worsen existing fair housing issues across the City.

LEVEL OF PRIORITY

Impediment	Priority
Location and type of affordable housing	High
Lack of affordable, accessible housing	High
Prevalence of substandard housing	High
Source of income discrimination	Medium
Displacement of residents due to economic pressures	High
Lack of regional cooperation	High
Zoning and lack of developable land	High
Imbalance between rental and homeownership units	Medium
Lack of awareness of fair housing rights	High
Deteriorated and abandoned property	Medium
Lack of affordable housing in a range of unit sizes	Medium
Lack of information available in multiple languages	High
Lack of organizational effectiveness	High

14.0 City Actions to Further Fair Housing

Table 14.1.1: New Bedford - Actions to Further Fair Housing				
#	Action	Impediment(s) addressed	Responsible Entity	Timeline
1	Assist New Bedford households in becoming homeowners, by providing down payment/closing cost assistance and gap financing.	<ul style="list-style-type: none">Low homeownership rates.	OHCD	Years 1-5
2	Improve the availability of accessible units of housing for residents with disabilities by continued funding and greater promotion of existing accessible modification programs.	<ul style="list-style-type: none">Lack of affordable, accessible housing	OHCD	Years 1-5
3	Identify problem properties using available data and work with relevant City departments to address.	<ul style="list-style-type: none">Prevalence of substandard housing, deteriorated and/or abandoned housing	OHCD; Code Enforcement	Year 2
4	Continue and expand the New Bedford- Fall River Housing Partnership's efforts to address housing in the greater region.	<ul style="list-style-type: none">Lack of regional cooperation; location and type of affordable housing; displacement of residents due to economic pressures	OHCD; Mayor's Office	Years 1-5
5	Work with relevant City departments to create a system and/or process that allows for anonymous tenant complaints regarding code enforcement violations.	<ul style="list-style-type: none">Prevalence of substandard housing	OHCD; Code Enforcement	Years 2-3
6	Explore the feasibility of an infill ordinance to allow for the development of housing on lots under 8,000 square feet	<ul style="list-style-type: none">Zoning and lack of developable land	OHCD; Planning	Years 1-2
7	With New Bedford Human Rights Commission and SouthCoast Fair housing, provide training annually to City staff and board members on fair housing.	<ul style="list-style-type: none">Lack of awareness of fair housing rights; lack of information available in multiple languages	OHCD; NB Human Rights Commission; SouthCoast Fair Housing	Years 1-5
8	Educate the public about fair housing rights and responsibilities by placing information about fair housing and fair lending on the City website and providing fair housing resource materials to various City and non-profit agencies.	<ul style="list-style-type: none">Lack of awareness of fair housing rights	OHCD	Years 1-5
9	Partner with relevant partner agencies to develop a fair housing workshop for regional municipal staff to be held annually in April, Fair Housing Month.	<ul style="list-style-type: none">Lack of regional cooperation; location and type of affordable housing	OHCD;	Years 1-5
10	Support enforcement of fair housing laws by working with the Greater New Bedford Landlord Association, renters, and homeowners to provide ongoing technical assistance and training to promote fair housing practices.	<ul style="list-style-type: none">Lack of awareness of fair housing rights	OHCD	Years 2-5

11	Work with City administration to increase diversity on City boards and commissions.	<ul style="list-style-type: none">▪ Lack of awareness of fair housing rights	OHCD; Mayor's Office	Years 1-5
12	Assist households with Limited English Proficiency by working with relevant City departments to inventory resource materials and identify items to be translated into multiple languages.	<ul style="list-style-type: none">▪ Lack of information in multiple languages	OHCD	Years 1-2

15.0 Appendix

SUMMARY OF FOCUS GROUPS

Analysis of Impediments Focus Group

On February 4, 2010, the Office of Housing and Community Development hosted a focus group with local advocates, housing and service providers, and lenders to gather their input on fair housing issues in New Bedford. Eighteen people attended the focus group. During the course of the discussion, participants responded to the following questions:

- What parts of New Bedford are generally seen as desirable places to live? What makes them attractive places to live? What barriers might someone face in moving to one of these areas?
- Are people in New Bedford segregated in where they live? How are they segregated: by race, ethnicity, religion? What causes this segregation to occur?
- Are you aware of any housing discrimination against certain populations in NB? How is this discrimination manifested?
- Do you feel like NB residents are educated about their rights regarding fair housing? Do they/service providers assisting them know where/how to report when they feel like they may have been discriminated against?
- What are the greatest fair housing or affordable housing needs in the community? How has recent growth in the housing market affected these needs? Are there certain populations that are particularly affected?
- How do you think fair housing issues will be impacted by the extension of the commuter rail into New Bedford? Are there certain populations that will be particularly affected?
- What, if any, municipal policies, procedures or actions are inadvertently leading to unequal access to housing opportunities in New Bedford?
- Are there certain populations who may want to move out of New Bedford to surrounding towns who are unable to do so, e.g., people of color, people with disabilities, people with housing vouchers? What barriers do they face?
- Is there anything we haven't discussed that you feel is important to our research?

Discussion Summary

People expressed that while New Bedford is a diverse City, it is not integrated. There are incidences of individual and widespread discrimination against certain populations. Discrimination manifests itself in a range of ways: from the individual owner of a multi-family property refusing to rent units, to neighborhood-level discrimination, to opposing facilities for people in recovery from substance abuse to City zoning practices that prohibit development on small, vacant lots. Living patterns illustrate that the City is segregated by race, ethnicity, and income.

Desirable Neighborhoods

When asked what sections of the City are desirable places to live, people noted that the Far North End, Far South End, and Buttonwood Park areas are most desirable. There are good schools in these neighborhoods, less turnover of residents, housing is predominately single-family and owner-occupied. These areas also are near amenities, parks and have good access to parking. Members of protected classes face barriers to living in these areas. Both rental and homeownership costs are high. There are a limited number of rental units, and those available for rent are not listed publicly. There is outright discrimination against recent immigrants and Black residents. There is also a history of NIMBYism, preventing the location of housing for people with disabilities in these areas.

Discrimination When Seeking a Place to Live

Discrimination against recent immigrants and people of color is not limited to certain parts of the City. One participant in the focus group recounted a discussion during a different focus group to inform the Community Health Needs Assessment, prepared by Barrett Planning Group. During that focus group, participants recalled an incident they experienced while seeking a rental unit.

A Hispanic couple was speaking with a prospective landlord over the phone. By their account, the husband, who had no accent while speaking English, had initiated the call and the discussion with the landlord was promising. When the wife, who did have a heavy accent, joined the discussion, the landlord abruptly ended the discussion. Other focus group participants stated they had had similar experiences.

Participants in the Analysis of Impediments focus group discussion also reported that discrimination based on children and source of income is prevalent in the City. SouthCoast Fair Housing’s testing shows that landlords are refusing to rent to families with children because they want to avoid liabilities due to the presence of lead paint in their properties. For similar reasons, landlords will also refuse to rent to voucher holders as they do not want to submit to HQS inspections or actively maintain their properties. They can rent poorly maintained units to recent immigrants and others unlikely to complain about the housing quality.

Compounding the barriers that discrimination presents to voucher holders, participants noted that due to rising market-rate rents and comparatively low fair market rents, many landlords are not opting to accept vouchers since they can make more money from the general market. One service provider participant noted that it is currently the most challenging time to place someone with a voucher since 1997. Another provided shared that landlords who have historically partnered with them to provide housing to people with vouchers are discontinuing the partnership, as they can make larger profits renting to non-voucher holders.

Other challenges to finding affordable rental housing include landlords requiring a minimum credit score of 650 to rent a unit, the need to put down a deposit of three times the rent to secure an apartment, and access to a public database of tenant evictions.

People Moving to New Bedford

In addition to large immigrant populations, participants noted that New Bedford is also experiencing people moving to the City from the Boston Metro area searching for affordable housing. This trend has been happening since before the South Coast Rail announcement to

begin construction. Increased demand from this population is one explanation for increases in housing costs in the City. Others noted that they are unsure if there is data to support the migration from the Boston area.

Municipal Policies and Actions

Focus group participants discussed some municipal policies that are exacerbating barriers to fair housing in New Bedford. Participants expressed the need for the City to amend its zoning ordinance to allow for infill housing. Currently, zoning requirements do not allow for new construction on lots less than 8,000 square feet. However, several vacant lots in the City are the same size as neighboring lots that are undevelopable as they do not meet the minimum lot size. The City has acknowledged this as a barrier to developing additional housing and is working on correcting it.

Also, participants noted that the City struggles with a negative perception of public housing. This perception needs to be addressed to allow for housing development in areas of the City that have not historically supported subsidized housing development.

Participants also stated a need for City leadership to acknowledge that while New Bedford is a “great diverse City,” much work is needed to make it an integrated City. Participants observed that there is a perception that New Bedford allows people to gloss over the fact that while diverse, the City is highly segregated, and discrimination against protected classes is prevalent.

SUMMARIES OF INTERVIEWS
Analysis of Impediments to Fair Housing Interview Questions

STAKEHOLDER INTERVIEW QUESTIONS

- How easy is it for members of the population you work with to find housing? What are some of their challenges in finding housing? (prompts if needed: affordability, housing in good condition, appropriate size for their household, discrimination)
- From your perspective, what are the greatest fair housing or affordable housing needs in New Bedford? How has recent growth in the housing market affected these needs? Are there certain populations that are particularly affected? Do these needs differ from the surrounding region?
- Are you aware of any housing discrimination against certain populations in NB? How is this discrimination manifested? Is the population you work with a target for discrimination?
- Do you receive complaints about access to housing? What are the most common complaints? What do you do when you receive a complaint?
- What, if any, municipal policies, procedures or actions are inadvertently leading to unequal access to housing opportunities in New Bedford for the population you work with? (prompts if needed: code enforcement, plan review & permitting, zoning)
- Are there certain populations who may want to move out of New Bedford to surrounding towns who are unable to do so, e.g. people of color, people with disabilities, people with housing vouchers? What barriers do they face? Have you worked with other agencies to help people secure housing in surrounding towns? If so, which?
- Do you feel like the population you work with is educated about their rights regarding fair housing and what to do if they are discriminated against? Do you have materials about fair housing available for your clients?
- Thinking about what we’ve discussed, in your opinion, what is the most important thing the City could do to further fair housing?
- Is there anything we haven’t discussed that you feel is important to our research?

AI Interviews Response Summaries

STAKEHOLDER INTERVIEW QUESTIONS: SOUTH COASTAL COUNTIES LEGAL SERVICES
(2/28/2020)

- Please tell me your position and a little about the work your agency does. (prompts: what populations do you work with, what are some of the other service providers/City agencies you work with, do you work to help people with housing issues)

Agency: nonprofit law firm, general legal services. Serve Brockton through Cape And Islands. Do various legal work with low income, disabled and older adults. Consumer advocacy, and works with immigration subsidiary in Brocton. We also work with older adults – over 60 - and represent them in various things, i.e., benefits, housing, and consumer debt. We are generally in the Greater NB area, but all over southern counties.

Coastline Elderly Services (grant funds positions) and Bristol Elder Services have a protective services grant for all Bristol County. The Fresh Start program (City of NB), helps older adults and disabled adults with clutter and hoarding situations. There is also the Southeastern Alliance For Elders (SAFE) and the Family Services Association based in Fall River - they provide guardian services for some people and do other things. PACE and Catholic Social Services.

Housing issues: in NB office – 2 housing attorneys - family law and SSDI attorney - and myself. Eviction defense in subsidized housing (public housing/subsidized) is what we do.

Common issues (eviction) – non-payment of rent cases, older adults living in private housing paying more than 50% of income to rent (60-90%). Smokers – public and subsidized housing (project-based) smoke-free. Sometimes there are issues with the condition of apartments (hoarding and maintenance issues)—arguments/violent behavior.

LLC and CDBG, MLAC (people don't like living in a "can"). Many people have lived for many years in a rural setting, don't like multi-story housing and higher density, so unattractive to people.

- Why do members of the population you work with live in New Bedford? (prompts if needed: they were born here, moved from other parts of the state/country/world, they can access services in NB).
- How easy is it for members of the population you work with to find housing? What are some of their challenges in finding housing? (prompts if needed: affordability, housing in good condition, an appropriate size for their household, discrimination).

We are working on developing services for older, disabled people including transportation to court and housing search services.

We have situations where people living in two-families and landlord sells home; may need to move. However, elderly or disabled people can apply to remain in the unit longer. Assistance with housing search is a huge need. Many people are homebound, and there is a lot to do – a lot of paperwork to get together. Twenty-five percent of clients have access to the internet (age).

We have not had cases where people have been denied housing because they are elderly/disabled.

- Are you aware of any housing discrimination against certain populations in NB? How is this discrimination manifested? Is the population you work with a target for discrimination?

With different benefits programs, state agencies will tell people you don't qualify so that they won't take their application. A woman was trying to get SSI, and was denied for asset. They were refusing to process the application.

One case where someone with implicit bias was trying to evict someone, but there were other factors.

- Do you feel like the population you work with is educated about their rights regarding fair housing and what to do if they are discriminated against? Do you have materials about fair housing available for your clients?

On the whole, people are quick to say they've been discriminated against. Sometimes older, white male clients will complain about reverse racism. More often, people feel that something is

not right and that the landlord is taking advantage of them. If you know to call legal services, you feel that something is wrong and understand what the resources available to you are.

Cases where landlords do not engage in dialogue will have complaints on disability. Landlords will discriminate based on disability. Tenants and landlords could use more information on their rights. Fifty percent of the time, clients can be advised to ask for reasonable accommodations (male, Portuguese clients may not want to ask).

- Do you receive complaints about access to housing? What are the most common complaints? What do you do when you receive a complaint?

The most common complaints are needing help applying for housing, delays in getting a subsidized unit, and excessive wait times for many years.

People have geographic preferences – they don't want to move to NB because of density. North NB could be an option for low-density elderly housing.

- From your perspective, what are the greatest fair housing or affordable housing needs in New Bedford? How has recent growth in the housing market affected these needs? Are there certain populations that are particularly affected? Do these needs differ from the surrounding region?

Regularly see private landlords in housing court regarding units with questionable habitability. They serve a niche for cheap housing that you can smoke in.

- What, if any, municipal policies, procedures, or actions are inadvertently leading to unequal access to housing opportunities in New Bedford for the population you work with? (prompts if needed: code enforcement, plan review & permitting, zoning).

How cities are handling tax foreclosures. Property taxes are becoming unaffordable for elders. Bundling debt and selling to third party collectors. Exemptions people are eligible for - you have to apply every year. This is burdensome for elders.

The Housing Authority (HA)'s position on disability; the HA gets frustrated with people with mental health issues and doesn't know how to handle them. Before we get involved, HA should

get in front of issues instead of reacting to them after becoming a crisis. Escalation always makes it worse. HA should be problem-solving at the outset.

HA can change payment standards because of disability (Reasonable Accommodation Compliance Officer), but they don't force people to lower rent neighborhoods.

City department staff helping people instead of citing people for having clutter makes a huge difference – more of that helps us solve cases rather than play defense. Interpersonal intervention to talk through issues. NB handles condemnations – says that housing is unfit for human habitations but don't pay relocation costs. Municipalities believe that the landlord should pay to relocate tenants, and the tenants are getting lost in the middle. Condemning the property is a legal action that triggers an obligation by the City to help the displaced. Instead, the Health Department says that it is "unfit for human habitation," which implies that the property will be repaired. Tenants then are left on their own to find new housing, as it takes weeks to have property fixed. People become homeless this way. Chapter 79A, Section 13.

- Are there certain populations who may want to move out of New Bedford to surrounding towns who cannot do so, e.g., people of color, people with disabilities, people with housing vouchers? What barriers do they face? Have you worked with other agencies to help people secure housing in surrounding towns? If so, which?

Supply of affordable housing and subsidized housing. Section 8 vouchers are only as good as the Fair Market Rents. People become concentrated in particular regions of the City where there are fewer amenities, creating primarily minority, female, and disabled areas.

It is three times harder to get a first floor apartment than to find an apartment. Sometimes there is money available, but people don't know about it. By the time the case gets to us, the stakes are high.

People lack knowledge of disabilities beyond people being in a wheelchair, and people don't know the obligations under the law.

The emergency room of the hospital – dealing with desperate people (attorneys on the defensive).

Explicit discrimination has declined. But, people are getting treated differently than others.

- Thinking about what we've discussed, in your opinion, what is the most important thing the City could do to further fair housing?
- Is there anything we haven't discussed that you feel is important to our research?

People who have opinions that people, as they get older and disabled, should go into "suitable housing" such as assisted-living or supported housing, instead of working on at-home services for people to age in place. Shelters won't take these populations because their care needs are too high. Shelters are trying to serve older, disabled people more. Pushing people out of housing because they believe they can be better served elsewhere is not giving the person a choice.

HomeBase doesn't work for everyone if you are chronically poor or have no way to increase your earnings; it works for people who have a temporary loss of income. Landlords are using the system to get big payouts and then turnaround and evict tenants. People are better served to find a subsidized unit. Unrestricted cash assistance is difficult – direct withdrawal of rent is a good solution to help people with non-payment of rent cases.

STAKEHOLDER INTERVIEW QUESTIONS: SOUTH COAST FAIR HOUSING
(3/4/2020)

- Please tell me your position and a little about the work your agency does. (prompts: what populations do you work with, what are some of the other service providers/City agencies you work with, do you work to help people with housing issues)

Started 8 years ago from scratch. I was focused on trying to get financial support for the organization. We were serving Rhode Island, Bristol, and Plymouth counties. We started with presentations, now we do testing and client work (FHIP grant 5 years ago, Enforcement FHIP grant 3 years ago).

We have a staff has 5.5 people, plus a tester. Our offices are in New Bedford and Pawtucket, and we do a lot of outreach. We have a couple of outreach grants from HUD.

All of our work is Fair Housing work. We are the only nonprofit Fair Housing organization in the region. The important part of the work is to educate people about why this work is important;

we do training for realtors/lenders. Starting to talk more about sexual harassment in fair housing. SCFH also does advocacy work for individual clients. We provide legal service in MA, but not RI.

We work with SCCLS and refer files back and forth; sometimes we work on them together especially when there is an eviction pending and there is a fair housing angle. They focus on eviction and SCFH will work on the fair housing side of it. There are usually reasonable accommodation cases. We have also partnered with another legal firm (Victim Rights Law Center) on sexual harassment cases with landlords.

Work with NeighborWorks Housing Solutions – presentations on fair housing (refer to Catholic Social Services/PACE).

We get a small amount of CDBG funds from City.

- Why do members of the population you work with live in New Bedford? (prompts if needed: they were born here, moved from other parts of the state/country/world, they can access services in NB)
- How easy is it for members of the population you work with to find housing? What are some of their challenges in finding housing? (prompts if needed: affordability, housing in good condition, appropriate size for their household, discrimination)
- Are you aware of any housing discrimination against certain populations in NB? How is this discrimination manifested? Is the population you work with a target for discrimination?

Patterns: folks with housing vouchers that can't use them anywhere because of voucher discrimination. Helping people keep voucher so it doesn't time out while resolving fair housing issues. Voucher administering agencies are not aware that voucher discrimination is illegal, and are not informing clients that it is illegal. If people new, there would be a lot more complaints. For each case, there are likely multiple incidences of discrimination.

Families with children find it hard to find housing/use a voucher because of lead in properties. We have tried to find out whether the voucher mattered - not showing a huge difference. Landlords have said they can't rent to families because the Housing Authority will make them delead apartments.

Disability/reasonable accommodation cases: people with mental health issues are a subset of this group (difficult to maintain housing because they or the landlord is having difficulty with tenant relationship). The chronically homeless population is coping with this. There are a lot of landlords that are not aware of the responsibility to provide reasonable accommodations. Agencies in the City are also not aware of their responsibility - nonprofit housing providers in the City. We sometimes have a hard time doing trainings with those organizations. These providers are getting funds from the City and SCFH, encouraging the City to do training for them so they are informed of their responsibilities.

We don't deal with the New Bedford Housing Authority a whole lot, we usually go to LLS. We have seen evictions by the Housing Authority regarding those with mental health issues. Not sure if staff are being adequately trained.

Issues are prevalent in New Bedford and in the region. Southcoast - not a lot of information/discussion of civil rights. New Bedford, Fall River, Taunton, Attleboro - not a lot of discussion about civil rights in these areas either, not like near Boston. Why? Because culture doesn't support talking about certain things. There is not a lot of leadership, and no civil rights/fair housing organizations like in other areas of the state.

AFFH: happy the City is doing an Analysis of Impediments (AI), but it's been since 2006. They did a survey of cities in the area doing an AI this year. New Bedford was the only City that was not planning on doing one. The leadership doesn't want more affordable housing. They blame people coming from Boston for all of our problems. Certain neighborhoods in the City feel as if they are not getting attention from the City around their needs.

Shelter where transgender person was denied access (may have been 2 people). Not sure that it got officially resolved. We talked with head of agency that funds the shelter.

- Do you feel like the population you work with is educated about their rights regarding fair housing and what to do if they are discriminated against? Do you have materials about fair housing available for your clients?
- Do you receive complaints about access to housing? What are the most common complaints? What do you do when you receive a complaint?
- From your perspective, what are the greatest fair housing or affordable housing needs in New Bedford? How has recent growth in the housing market affected these needs? Are there

certain populations that are particularly affected? Do these needs differ from the surrounding region?

- What, if any, municipal policies, procedures or actions are inadvertently leading to unequal access to housing opportunities in New Bedford for the population you work with? (prompts if needed: code enforcement, plan review & permitting, zoning)
- Are there certain populations who may want to move out of New Bedford to surrounding towns who are unable to do so, e.g. people of color, people with disabilities, people with housing vouchers? What barriers do they face? Have you worked with other agencies to help people secure housing in surrounding towns? If so, which?

There are not regional discussions about housing. Towns are incentivized not to have those discussions. Regionally, not having conversations about fair housing. SRPEDD is not having this conversation. NeighborWorks Housing Solutions are the regional housing authority. PACE/Catholic Charities is also regional (local state senator).

People don't cross borders into other towns, despite the lack of affordability in surrounding towns. The local preference is the Fairhaven Housing Authority.

Historic preservation folks are concerned about lead abatement because of description of housing. This is also true about making modifications for those with disabilities. Is there a way to do both? Equal access to those houses.

- Thinking about what we've discussed, in your opinion, what is the most important thing the City could do to further fair housing?

Would be good to have diversity on City boards, not sure there is an affirmative attempt to have this.

City schools do better than others. There was a DOJ lawsuit 20 years ago and the City was required to eliminate academic tracking because it was so discriminatory. Schools were creating tracks at such an early age and doing it in such a discriminatory way. Education is not equally good throughout the City. People in the know, know how to get their kids into good schools.

Low lying fruit: be more proactive about putting information on the website; directing people to SCFH; talking about it more within housing programs to make people aware that they are taking it seriously.

Bring SCFH to talk to planning boards and train municipal staff commissions. The City needs to do more to start a conversation about fair housing to increase awareness.

Concern there isn't political support for fair housing, nor for equity or investment in areas.

Getting regional organizations together to start the conversation, rather than relying on others.

Lack of information for landlords and tenants on fair housing rights; they are grossly undereducated. The City could make sure that players are well-trained and know what to do when they spot discrimination.

We are training a lot of LLS working with the New Bedford Housing Authority. There should be a regional conversation/convening to discuss fair housing issues and equity.

- Is there anything we haven't discussed that you feel is important to our research?

We joined New Bedford about 8 years ago and done a lot of testing here – concerning voucher holders and familial status, primarily. We have information on complaints that they filed. Whatever we send can be included in report as needed.

Mentioned NAACP – not invited to focus group.

STAKEHOLDER INTERVIEW QUESTIONS: PACE
(3/6/2020)

- Please tell me your position and a little about the work your agency does. (prompts: what populations do you work with, what are some of the other service providers/City agencies you work with, do you work to help people with housing issues)

PACE – Community Action Agency. Fuel assistance /Head Start/Early Childhood Education /Foodbanks/Tax assistance/housing programs. Largest program with childcare vouchers (forty-region communities). We have been in NB for 40 years, and 20 years younger than the other CAA.

Population we serve – we capture people across protected classes. Serve 30,000 per year in Greater New Bedford, mainly lower-income backgrounds, the elderly, people of color, PWD, those with housing vouchers/subsidies.

New Bedford and the surrounding region – our work varies by program/grant. We service New Bedford, Dartmouth, Marion, Mattapoisett, Wareham, Westport, etc..

- Why do members of the population you work with live in New Bedford? (prompts if needed: they were born here, moved from other parts of the state/country/world, they can access services in N.B.)
- How easy is it for members of the population you work with to find housing? What are some of their challenges in finding housing? (prompts if needed: affordability, housing in good condition, an appropriate size for their household, discrimination)

The problem that is getting more intense is affordability. The market rate has been going up, which masks fair housing challenges that may underlie affordability. LLS don't have to rent to people because they can get more money for apartments. Actual market rent has gone up so much that people with vouchers aren't eligible because the rents are too high (fair market rents).

A higher population of people with fixed incomes is in New Bedford because it is one of the last affordable places for people to live – “putting the squeeze on people.”

They have a development arm, and are renting/managing them.

Not sure if the Housing Authority has looked into SAFMR. I know they are looking to do more Project-Based Section 8.

Access to opportunity: City does a good job of spreading resources equitably. Sometimes the City has been criticized for focusing too much on the Downtown, but don't think that's merited.

Absentee landlords are prevalent in the City, especially in the poorer parts. There are poor conditions and poor quality of housing i.e., cockroaches and non-working appliances. There is retaliation if people complain. In many cases, LLS can immediately respond to complaints without having to work the system. Issues are more likely to impact the Latino population that has come here within the last ten years. They may not know what options are available to them and may be scared to seek out assistance from government programs.

- Are you aware of any housing discrimination against certain populations in N.B.? How is this discrimination manifested? Is the population you work with a target for discrimination?
- Do you feel like the population you work with is educated about their rights regarding fair housing and what to do if they are discriminated against? Do you have materials about fair housing available for your clients?

Landlords themselves would benefit from education. The enforcement isn't there., so educating may be the best way to address education/awareness issues. There should be policing of the “worst of the worst slum lords.” It would be beneficial to educate people who are more reasonable e.g., individual owners, retired owners of small properties as they are more interested in doing the right thing and they care.

Not sure the role of code enforcement in the City. They are responsive to complaints, but not proactive, necessarily. Is there an apartment certification process?

- Do you receive complaints about access to housing? What are the most common complaints? What do you do when you receive a complaint?

Transportation is a bigger issue than gets talked about in Community Development circles. New Bedford is not a walkable City; it is hard to get around if you don't have a car. There are no buses on Sunday and they stop early on Saturday. During the week, the schedule is spread out. Cars are a big expense, and there is not a lot of philanthropic support for vehicles.

Jobs/employment: metrics show that the City has done well with unemployment, but it is still high. Even in a good economy, wages aren't trickling down to workers. Manufacturing jobs are 13-14/hours with benefits/full-time. It is not easy to secure full-time jobs. The fishing industry brings in money, but not staying in the City in terms of investment. There are not high-paying jobs. Those making higher wages may not live in the City.

Schools: people may want to move to surrounding towns for better schools, or to a better part of the City; that may be misguided. Generally, the schools are pretty good. We don't have bad schools, per se, even if they don't do well on standardized tests. This is mostly an indicator of need to service non-English speaking people.

“How you make it is you get a job and move to suburbs.”

- From your perspective, what are the greatest fair housing or affordable housing needs in New Bedford? How has recent growth in the housing market affected these needs? Are there certain populations that are particularly affected? Do these needs differ from the surrounding region?
- What, if any, municipal policies, procedures, or actions are inadvertently leading to unequal access to housing opportunities in New Bedford for the population you work with? (prompts if needed: code enforcement, plan review & permitting, zoning).
- Are there certain populations who may want to move out of New Bedford to surrounding towns who are unable to do so, e.g., people of color, people with disabilities, people with housing vouchers? What barriers do they face? Have you worked with other agencies to help people secure housing in surrounding towns? If so, which?

Yes, but not sure if people are facing outright discrimination. The rental market is a private market, renting through word of mouth. The process of renting is nightmarish. An interesting exercise would be to go online and see if there are apartments available for rent. Those that are available may be explicitly asking for students. Fall River has this issue also; both have closed markets.

- Thinking about what we've discussed, in your opinion, what is the most important thing the City could do to further fair housing?

The most important things are a mix of landlord education and incentives to participate. Enforcement is also important, and CORI checks for all tenants (proposed: City ordinance).

It is important to look at affordability and what it can do; it is the City's role to expand access to affordable housing. There hasn't been a lot of affordable housing development in the last few years. This is in contrast to Boston, where there is active development and ownership of affordable housing. In New Bedford, the attitude has been that it's all affordable housing – that sentiment will need to change. Some people see increasing market prices as a good thing.

- Is there anything we haven't discussed that you feel is important to our research?

The interplay of all housing factors contributes to the fair housing pieces. It is hard to say what fair housing issues are because they are buried under other issues, particularly affordability.



Analysis of Impediments to Fair Housing

PUBLIC PARTICIPATION PROCESS

The Analysis of Impediments (AI) is a review of barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice and serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

The City of New Bedford, through its Office of Housing and Community Development (OHCD), has undertaken a Public Participation process to identify impediments to Fair Housing. Impediments to fair housing choice are defined as follows:

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

TYPE OF CITIZEN PARTICIPATION		MEETING	DATE
Focus Group	Stakeholder Focus Group		January 22, 2020
Targeted Interviews/Community Groups	Targeted interviews with key stakeholders in the lending, non-profit, legal advocacy, public services, and homeless service organizations		January 2020
Public Meetings	Public Meeting #1 at Carney Academy 6pm		January 14.2020
	Public Meeting #2 at OHCD Offices 6pm		January 15.2020
Survey	Resident Survey (Survey Monkey via City Website)		January 2020
Analysis of Impediments Document Development	Draft Analysis of Impediments		August 16, 2021
	30 Day Public Comment Period		August 16, 2021 – September 17, 2021
	Submission of Final Analysis of Impediments to HUD		September 20, 2021



Analysis of Impediments to Fair Housing

PUBLIC COMMENT OUTREACH & PUBLIC COMMENT RECEIVED

The City of New Bedford published its DRAFT Analysis of Impediments to Fair Housing Choice on the City of New Bedford website and announced the availability of the draft plan for a 30 day public comment period via flyer (in three languages) disseminated through email distribution, online at <https://www.newbedford-ma.gov/housing-community-development/> and via h social media (Facebook).



City of New Bedford, Massachusetts
Mayor Jonathan F. Mitchell
Office of Housing & Community Development
Patrick J. Sullivan, Director



ANALYSIS of IMPEDIMENTS TO FAIR HOUSING CHOICE

Now Available for Public Review

The City of New Bedford's Office of Housing and Community Development is accepting comments on its Analysis of Impediments to Fair Housing Choice (AI). The purpose of the AI is to identify and document any fair housing issues within the City of New Bedford and to develop strategies to reduce and/or eliminate impediments to fair housing choice. Impediments are defined as any actions, omissions or decisions taken because of race, color, religion, sex, disability, familial status or national origin that restrict housing choices for individuals or families.

As part of this obligation, the City of New Bedford is required to: (1) periodically conduct an analysis to identify impediments to fair housing choice within the community; (2) take appropriate actions to ameliorate the effects of any impediments that were identified through the analysis; and (3) maintain records concerning the analysis and any actions taken.

A draft copy of the AI may be viewed at: <https://www.newbedford-ma.gov/housing-community-development>

The Analysis was created in collaboration with extensive outreach to community stakeholders and agencies. The City of New Bedford hereby notifies the public that beginning on August 16, 2021 and ending September 17, 2021, public comment will be accepted. Comments and questions should be addressed to Jennifer Clarke, Deputy Director Community Development, 608 Pleasant Street, New Bedford, MA by mail, or by email to Jennifer.Clarke@newbedford-ma.gov. All comments received during the noted public comment period will be considered.

This public notice only announces the availability of the AI; a copy of the complete Analysis of Impediments will be available for public review beginning August 13, 2021 through September 17, 2021 online at the OHCD website at: <https://www.newbedford-ma.gov/housing-community-development>

If you know of anyone who is unable to read this ad or is in need of translation services, please contact the Office of Housing & Community Development at OHCD@newbedford-ma.gov so that assistance may be provided.

This information is available in Portuguese, Spanish or other language upon request. In accordance with the Americans with Disabilities Act (ADA), if any accommodations are needed, Please contact the OHCD at OHCD@newbedford-ma.gov for assistance.

Questions? Contact: OHCD@newbedford-ma.gov

Flyer used in email distributions

OFFICE OF HOUSING & COMMUNITY DEVELOPMENT

The City of New Bedford's Office of Housing & Community Development (OHCD) is a resource for city-wide programs, plans and possibilities in New Bedford. Comprised of Housing and Community Development divisions, the OHCD's work focuses on a wide variety of federally-funded activities that strengthen the city and help develop strategies to increase the growth and prosperity of New Bedford's residents.

The **Housing** Division administers a range of programs geared towards assisting folks with homeownership, rehabilitation, accessibility, emergency repairs and lead paint. Funding for these programs comes from both the federal government and state-wide programs, all of which are intended for households in low-moderate income ranges.

The **Community Development** Division relies on federal dollars from the U.S. Department of Housing & Urban Development [HUD] in undertaking a wide range of community-based activities ranging from street improvements and demolitions to economical development and public services.

Information specific to the City of New Bedford's efforts around ending homelessness may also be found at the City of New Bedford Homeless Service Provider's Network website at: www.nbhspn.com.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE IS NOW AVAILABLE FOR PUBLIC COMMENT

The Analysis of Impediments to Fair Housing Choice is available for its 30 day public comment period. The review period runs from August 16, 2021 to September 17, 2021.

A copy of the Analysis of Impediments plan is available here as well as flyers in English, Portuguese and Spanish announcing the public comment period:

[Analysis of Impediments to Fair Housing Choice Plan](#)
[Analysis of Impediments Availability Flyer, English](#)
[Analysis of Impediments Availability Flyer, Spanish](#)
[Analysis of Impediments Availability Flyer, Portuguese](#)

Your comments are welcomed throughout the public comment period and may be emailed to OHCD@newbedford-ma.gov.

Website Post

New Bedford Office of Housing and Community Development
Posted by Jennifer Clarke
August 16 • 🌐

The Analysis of Impediments to Fair Housing Choice is now available for Public Comment. The 30 day review period runs August 16th - September 17th, 2021. Check out the plan here...
<https://s3.amazonaws.com/newbedford-ma/wp-content/uploads/sites/58/20210816033335/ANALYSIS-of-IMPEDIMENTS.pdf>

Analysis of Impediments to Fair Housing Choice
CITY OF NEW BEDFORD, OFFICE OF HOUSING & COMMUNITY DEVELOPMENT, OCTOBER 2021

Prepared for the New Bedford Office of Housing and Community Development
Madeline Grant Coley & Barrett Planning Group LLC

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Facebook Post

There were no public comments received during the public comment period.