

City of Springfield, Massachusetts

Analysis of Impediments to Fair Housing

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I. EXECUTIVE SUMMARY

The City of Springfield, population 153,060, is a welcoming and diverse city. It is a minority-majority community, in which the combined African-American and Latino populations outnumber whites. It is a “Gateway City”, which has maintained a stable population over years through ongoing in-migration from Puerto Rico and immigration from places outside the continental United States. It is a city with multiple multi-ethnic neighborhoods—in which at least three racial groups account for 10% or more of the neighborhood population. Springfield’s average age is lower than the surrounding communities and the Commonwealth of Massachusetts, indicating the large presence of families with children, and it has a higher-than-average number of residents with disabilities. Springfield is ranked by the Advocate magazine in 2013 as being the second most gay-friendly city in the country.

Springfield has an extraordinary sense of community and resiliency. The City experienced the terrible destruction of a tornado in June 2011, and residents came together to help each other recover, with an outpouring of volunteer efforts and financial support for neighbors and the City’s rebuilding efforts. Many residents are passionate about their love and concern for the City.

While there is much to celebrate about diversity and community in Springfield, the City faces ongoing and complex challenges to fair housing and equal opportunity.

A key factor that led to passage of the Fair Housing Act was the separation of white and black neighborhoods and the unequal opportunity available to black neighborhoods, a situation that developed through years of explicitly discriminatory policies and practices by both public and private actors. Fair housing goals therefore incorporate both opening up the entire housing market to enable people of color to access housing anywhere, and also improving access to opportunity for all people, no matter what neighborhood or community they live in. Since the 1968 passage of the Fair Housing Act, our nation has become far more diverse, with a large and growing increase in the Latino population, as well as increase of people of color from many nations. The increasing globalization has transformed the challenge of segregation from being only black-white to being about segregation between all people of color from whites.

Current thinking about segregation is focused not only on access to housing and neighborhoods, but also access to opportunity. High opportunity indicators are: availability of sustainable employment, high performing schools, a safe environment, access to high quality health care, adequate transportation, quality child care, safe neighborhoods, and institutions that facilitate civic and political engagement. The focus on access to opportunity is grounded in decades of research that demonstrates that the zip code in which a person lives is a strong determinate of that person’s health, education and life expectancy.

Within the City of Springfield, every neighborhood includes a considerable number of people of color, and every neighborhood includes public or subsidized housing, as well as opportunities for people to use Section 8 voucher assistance. Every neighborhood, therefore, is open to all, at least to some degree, regardless of color or income. At the same time, however, not all neighborhoods are equal in terms of access to opportunity. Most notably, Springfield neighborhoods have varying levels of public safety and

neighborhood blight. Also, in a survey completed as part of this Analysis of Impediments to Fair Housing, some residents also indicated that they feel that there is inequity in access to political power. There are significant disparities in average incomes in different City neighborhoods.

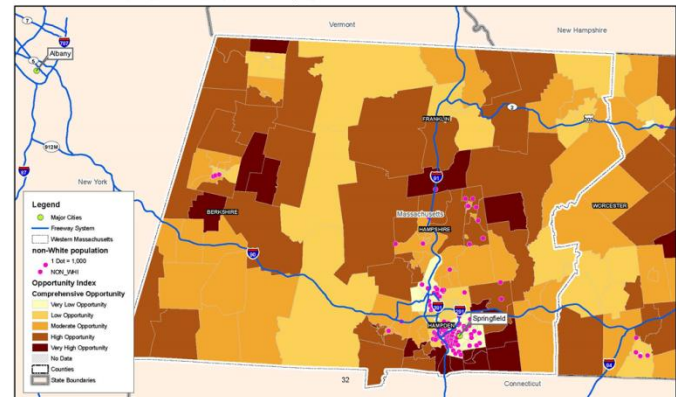
On a regional scale, there is a long-standing and growing divide between the City of Springfield and its suburbs regarding race and ethnicity. One indicator of this problem is the recent ranking of metropolitan areas by the “dissimilarity index”, a statistical tool that analyzes the degree of racial and ethnic integration within a geographic area. The University of Michigan report “New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Censuses” identifies the Springfield Metropolitan Area as #1 in the country for Hispanic-White segregation, and #22 for Black-White segregation. What this divide looks like in the community is a diverse multiethnic city bordered by majority white suburbs, some of which have populations that are 95% or more white.

Unequal access to opportunity is most striking when looked at on a regional basis and when looked at in relation to the overlay between race/ethnicity and access to opportunity. Comprehensive analysis of access to opportunity in the Pioneer Valley identifies the cities of Springfield and Holyoke as the region’s lowest opportunity communities. Mapping done by the Kirwan Institute for the Study of Race and Ethnicity dramatically shows the region’s concentration of people of color in exactly the places where there is the lowest access to opportunity. This is the lingering result of outright discrimination and segregation, and requires a coordinated local, regional and national response.

Map 3D: Comprehensive Opportunity Map with non-White population overlay
WESTERN MASSACHUSETTS

This map displays the spatial pattern of distribution of opportunity based on Education, Economic & Mobility, and Housing & Neighborhood indicators overlaid with non-White population.

Source: US Census 2000, EPA, MA State Police, HUD. Date: July 17, 2008



Springfield has a large population of very low-income residents and an overall lower average household income and lower property values than surrounding communities. This creates a situation in which the City has fewer resources to provide high-opportunity services and amenities than surrounding communities.

The different levels of opportunity available to people in different communities and to people of different races and ethnicities impacts fair housing and equal opportunity for all. Strategies to remedy segregation and lack of access to opportunity can be categorized into several different types: People-Based Strategies, which ensure that people of color have equal access to housing; Place-Based Strategies, which seek to improve opportunity in areas of concentration of people of color in low-income neighborhoods (both to improve resident’s access to opportunity and to create conditions leading to greater economic diversity in the neighborhood); and Linkages, which are geared toward enabling people in low-income communities of color access to jobs, education, and other opportunities they may be unable to access in their neighborhoods. This analysis also includes strategies aimed toward increased understanding, in

individuals and throughout the region, of the benefits of diversity, the harm caused by segregation, and open-mindedness toward differences.

Using housing as a tool to address unequal opportunity in a very low-income community highlights the real tension between the needs of individual households for affordable housing, and the need for the community to have sufficient resources to provide high-quality opportunity to all its residents. In Springfield, the abundance of existing public and subsidized housing has hampered the City's goal of providing high opportunity to its citizens. The City's capacity to provide residents with equal opportunity is contingent on a regional affordable housing solution, combined with strategies that improve the financial circumstances of existing City residents.

Therefore, the solution to the City's and region's racial/ethnic disparities does not rest with housing strategies alone. Increased employment opportunities, improved public education, improved public safety, increased access to transportation, availability of services and community resources are all contributors to the quality of life and would over time contribute to reversing this concentration of poverty and racial segregation. On a regional basis, municipal taxation policy, fragmentation of municipal borders, and zoning regulations enable communities of wealth to remain exclusive enclaves of high opportunity, while starving cities and making it difficult for low-income people and people of color to move out of the City.

IMPEDIMENTS TO FAIR HOUSING CHOICE

The following impediments to fair housing choice in the City of Springfield were identified through this Analysis of Impediments:

Discrimination or Barriers that Limit Successful Housing Search and Access

- Discriminatory attitudes of some individual landlords, property owners, and others in the fields of housing search, rental, sales and financing
- Cultural racism, at the societal and individual level
- Lack of awareness of Fair Housing laws
- High number of rental units owned and managed by small unsophisticated landlords
- Linguistic profiling (a negative response to a housing seeker via phone because of an accent or manner of speaking)
- Discrimination in advertising (Craigslist has been singled out for this barrier by survey respondents)
- Refusal to take Section 8 housing vouchers by some landlords
- Limited number of housing professionals (especially Realtors and mortgage lenders) who speak Spanish
- Lack of information on housing options and the housing market in Spanish
- Presence of lead paint in older housing
- Lack of accessible units
- Lack of access to credit on equal terms, including lenders that target minority neighborhoods for loans with less-favorable terms (predatory lending)

- Factors that contribute to a lack of education and employment opportunities for people of color, thereby limiting their incomes and ability to access the private housing market
- Disparities in purchasing power, and, particularly, a large population with very low incomes

Factors that Support Continuation of Exclusive Communities which cannot be Accessed by Persons in Protected Classes

- Lack of multi-family or rental housing in many of the communities outside of Springfield as a result of municipal zoning that limits or prohibits its construction
- Lack of low-income housing, particularly for families, in most communities outside Springfield
- Regional HUD Fair market rents (FMR) which prevent most Section 8 Housing voucher holders from renting units in high opportunity communities where rents exceed the regional FMR
- Lack of an effective regional public transportation system
- Lack of a regional tax base, which enables higher-opportunity communities to be better able to provide high-quality municipal services, while low-income/low-opportunity communities are starved for resources

Factors that Contribute to Concentration of Affordable or Poor-Quality Housing in Low-Opportunity Neighborhoods

- Cultural and institutional racism
- A weak housing market in the City, where the costs of construction exceed the sales or rental income value of residential properties
- A market that attracts low-quality investor-owners who fail to maintain properties
- Poor condition of rental and for-sale housing in distressed neighborhoods
- Presence of deteriorated properties that are vacant or not actively managed
- State and federal policies regarding affordable housing funding
- The placement of the vast majority of the region's public and subsidized housing in a limited area in the region (Springfield and Holyoke)
- Lack of sufficient resources for the City to adequately address neighborhood blight, public safety, and quality K-12 education

Factors that Contribute to Lack of Employment Opportunity for City Residents

- Discriminatory attitudes of persons in position to hire
- Limited public transit routes and schedules
- Low educational outcomes for City residents

ACTIONS TO ADDRESS IMPEDIMENTS

The City of Springfield proposes the following actions to address the impediments to fair housing that were identified through this AI:

People-Based Strategies

These are strategies that help individuals and households overcome discrimination in housing search and have equal access to housing.

- Educate the public about fair housing rights and responsibilities
 - Put information about fair housing and fair lending on the City website and on the website for the Buy Springfield Now campaign
 - Provide training and educational materials about fair housing to housing search workers at agencies throughout the City
- Support vigorous enforcement of Fair Housing Laws
 - Continue funding support for the Massachusetts Fair Housing Center and partnership with the Massachusetts Commission Against Discrimination and HAP Housing to enable:
 - Ongoing outreach to local landlord associations
 - Education of renters and homebuyers
 - Monitoring and reporting fair housing violations
 - Testing, especially for linguistic profiling, Section 8 discrimination, and discrimination against families with children
 - Technical assistance in the form of trainings and information on accessibility laws and best practices to landlords and housing providers.
 - Review internal data to determine if the City may be able to support legal claims regarding discriminatory lending activities.
- Assist Springfield households to become homeowners
 - Provide downpayment assistance to first-time homebuyers
 - Coordinate with HAP Housing's Homebuyer Club and with Springfield Partners for Community Action's Individual Development Account (IDA) program
 - Coordinate with lenders regarding assistance to first time homebuyers with mortgage assistance and below market mortgage products.
 - Coordinate with the Springfield Housing Authority to expand the Section 8 homeownership program
- Assist households with Limited English Proficiency (LEP) to access housing
 - Ensure that housing search services are available in Spanish, and with translation available for other languages
 - Provide homebuyer education in Spanish
 - Access to Realtors and financing in Spanish
 - Make fair housing information and services available in Spanish
 - Review the City's Limited English Proficiency (LEP) policy, and revise as indicated
- Improve access to housing for persons with disabilities

- Review and revise City guidelines for investment of housing funds, to ensure that these guidelines prioritize accessibility and viability.
- Improve access to housing for families with children
 - Apply for competitive federal funding to address lead-based paint hazards in housing throughout the City

Place-Based Strategies

These are strategies that assist neighborhoods and communities to achieve integrated housing and equal access to opportunity for all.

Strategies for All City Neighborhoods

- Implement the 2011 Foreclosure Ordinances (delayed due to legal challenge)
- Promote the “Buy Springfield Now” program, which is a collaborative effort comprised of public sector and private sector organizations to attract middle income residents to homeownership in the city
- Review and revise City guidelines for investment of HOME funds, to ensure that these funds are prioritized to support neighborhood revitalization and needed rehabilitation of older housing
- Continue existing strategies to improve Springfield Public Schools city-wide

Strategies for Lowest Opportunity Neighborhoods

- Promote market-rate housing
- Continue to use Neighborhood Revitalization Strategy Area designations for the South End, Six Corners, Old Hill, Brightwood and Memorial Square neighborhoods, and to provide targeted investment of federal dollars in those neighborhoods
- Use federal funds, including HOME and CDBG-DR, to create new homeownership units in NRSAs
- Provide funds for homeowner repairs and rehabilitation
- Explore creation of a housing rehabilitation program targeted to landlords
- Continue existing historic preservation program, and explore creation of a historic preservation revolving fund
- Seek funds under the federal Choice, Promise and Byrne grant programs to create or expand place-based housing, education and public safety strategies
- Support early literacy strategies targeted toward ensuring that children can read by grade 3

Linkage Strategies

These are strategies aimed at assisting people in protected classes to access opportunity.

- Provide minority residents with assistance in accessing housing in high-opportunity communities
 - Advocate for HUD to partner with the City to create a Moving to Opportunity demonstration program in which Section 8 voucher recipients are provided with mobility counseling and HUD creates small-market Fair Market Rent values, which would enable voucher-holders to afford rents in communities outside of Springfield and Holyoke

- Coordinate with the Springfield Housing Authority and HAPHousing to provide Section 8 mobility counseling
- Take steps to improve access to employment for City residents, especially in low-income neighborhoods
 - Use a Section 3 coordinator to improve Section 3 hiring outcomes
 - Vigorously enforce Section 3 requirements for HUD-funded projects
- Work with the Springfield Housing Authority to explore designation as a Moving to Work Housing Authority, which would enable SHA to have more flexibility in its funding, in order to assist residents to improve education and income
- Use City role in governance of Pioneer Valley Transit Authority to improve public transit for City residents

Strategies to Increase Understanding

- With the Pioneer Valley Planning Commission, facilitate the formation of and participate in a fair housing coalition of key stakeholders to help shape a regional conversation on fair housing
- Play a leading role on the Regional Housing Plan Committee
- Collaborate with Massachusetts Commission Against Discrimination, Massachusetts Fair Housing Center and HAPHousing to produce annual regional fair housing conference, and emphasize the issue of regional access to opportunity at these conferences
- Facilitate participation in anti-racism training by City staff and staff at agencies funded by the City
- Engage in collaborative discussions to address the issue that the few accessible units in the region often get rented to people who do not need the accessibility features
- Advocate for changes to state revenue sharing practices which provide inequitable financial support for cities

II. INTRODUCTION

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

PURPOSE AND CONTEXT

The 1968 Fair Housing Act is a “comprehensive open housing law” intended to provide fair housing throughout the nation by prohibiting discrimination in housing, by providing for enforcement of fair housing laws, and by directing the U.S. Department of Housing and Urban Development (HUD) and its grantees to “affirmatively further fair housing.” The history of the Act makes clear that it was enacted not only to eliminate individual instances of housing discrimination, but also to replace segregated housing patterns with integrated ones. The Act was passed shortly after the Kerner Commission, in its analysis of the causes of the 1967 race riots, declared: “Our nation is moving toward two societies, one black, one white—separate and unequal.” A key finding of the Kerner Commission was that race riots resulted from lack of black access to economic opportunity, and that this lack of access was due to white racism and *de facto* segregation that led to creation of ghettos.

By the time the Fair Housing Act was passed, high levels of racial segregation in America’s housing had become entrenched as a result of a half-century of explicitly discriminatory policies by both private and public entities—including racial zoning, restrictive covenants, public housing policies, urban renewal, and federal mortgage programs. The same segregation that limited people to certain neighborhoods also limited opportunities for education and employment.

In the 45 years since passage of the Fair Housing Act, our nation has become increasingly diverse. Currently, African Americans, Latinos, Asian Americans and Native Americans make up more than 35 percent of the United States population. In a few decades, those groups are projected to represent a majority of U.S. residents. We have experienced modest declines in residential racial segregation (black-white), reflected in each decennial census. Today, the average white American lives in a neighborhood that is 77% white, down from 88% white three decades ago.² However, our nation’s fastest-growing and now largest minority group is Latinos, and the national level of segregation of Hispanics is both high and has remained virtually unchanged over four decades.

¹ Department of Housing and Urban Development, Fair Housing Planning Guide www.hud.gov/offices/fheo/images/fhpg.pdf

² TURNER AND MCDADE, Neighborhood Diversity: Immigration Brings Big Changes to Urban Neighborhoods, <http://metrotrends.org/Commentary/neighborhood-diversity.cfm>

RACIAL ISOLATION AND LOW OPPORTUNITY NEIGHBORHOODS

A key problem that the Fair Housing Act sought to remedy is the inequality between racially separate communities in the United States. It is, in fact, the overlap between poverty and minority concentration that perpetuates separate and unequal opportunity. Communities of color continue to be plagued by diminished resources and diminished access to opportunity. The fact that communities of color are, too often, low-income communities impacts the health, education, and life expectancy of people of color. Decades of social science research supports the finding that neighborhood conditions play a substantial role in the life outcomes of inhabitants.³

In recent years, researchers have begun looking at the challenge of ongoing segregation in terms of access to opportunity. The Kirwan Institute for the Study of Race and Ethnicity has created a research model for understanding the dynamics of opportunity within metropolitan areas. The purpose of this tool is to illustrate where opportunity rich communities exist (and assess who has access to these communities) and to understand what needs to be remedied in opportunity poor communities. Mapping opportunity in a region requires selection of variables that are indicative of high (and low) opportunity. High opportunity indicators are: availability of sustainable employment, high performing schools, a safe environment, access to high quality health care, adequate transportation, quality child care, safe neighborhoods, and institutions that facilitate civic and political engagement.

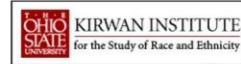
In 2009, the Massachusetts Law Reform Institute sponsored the Kirwan Institute in undertaking opportunity mapping for Massachusetts.⁴ Map 1D illustrates the level of opportunity in western Massachusetts communities. Map 3D shows the opportunity areas with an overlay of the non-white population, and makes clear the degree to which non-white populations predominantly live in low-opportunity areas. The maps demonstrate the regional disparity between opportunity communities and the areas where people of color live. Very low numbers of people of color live in high opportunity communities. Census 2010 data reveals that on average, black and Hispanic households live in neighborhoods with more than one and a half times the poverty rate of neighborhoods where the average non-Hispanic white lives.

Among the Kirwan Institutes' findings is the fact that racial isolation into low-opportunity neighborhoods is far more pronounced than class-based segregation into these low-opportunity communities. The report states that while both race and class play a role in who has access to high-opportunity communities, race appears to play a stronger role than class in heightening isolation into low-opportunity neighborhoods.

³ For a review of literature supporting the importance of neighborhoods in predicting life outcomes, see Appendix C of the Kirwan Institute's 2009 "The Geography of Opportunity: Building Communities of Opportunity in Massachusetts." www.mlac.org/pdf/Geography%20of%20Opportunity_MA_full%20report.pdf

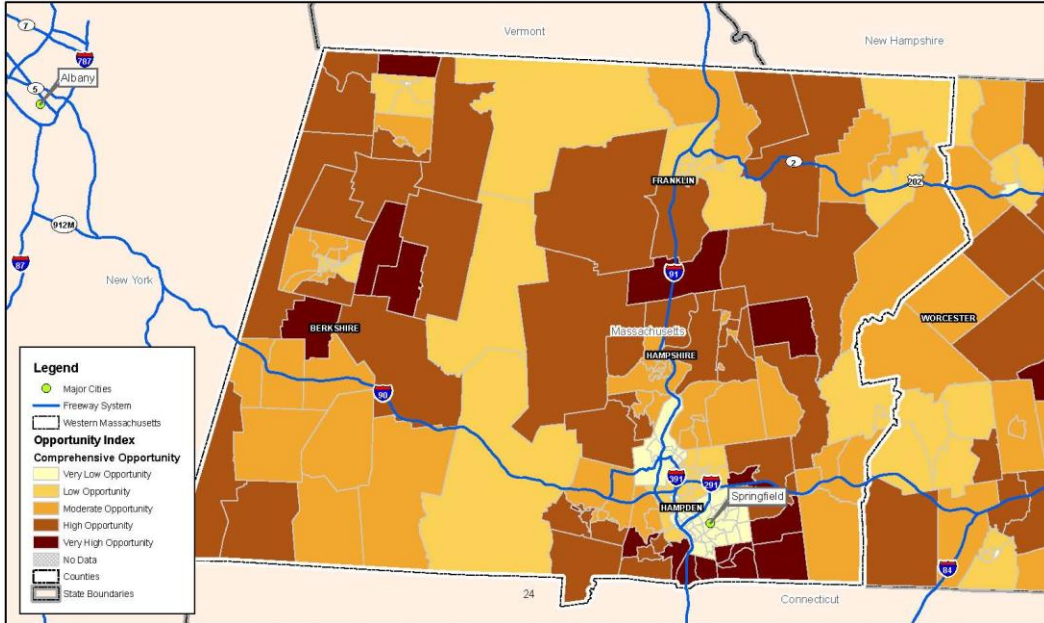
⁴ Kirwan Institute, The Geography of Opportunity: Building Communities of Opportunity in Massachusetts, January 2009, http://kirwaninstitute.osu.edu/docs/publications/finalreport_maoppcomm_kirwan_jan2009.pdf

Map 1D: Comprehensive Opportunity Map WESTERN MASSACHUSETTS

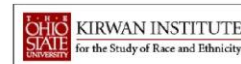


This map displays the spatial pattern of distribution of opportunity based on Education, Economic & Mobility, and Housing & Neighborhood indicators

Source: US Census 2000; EPA; MA State Police; HUD Date: July 17, 2008

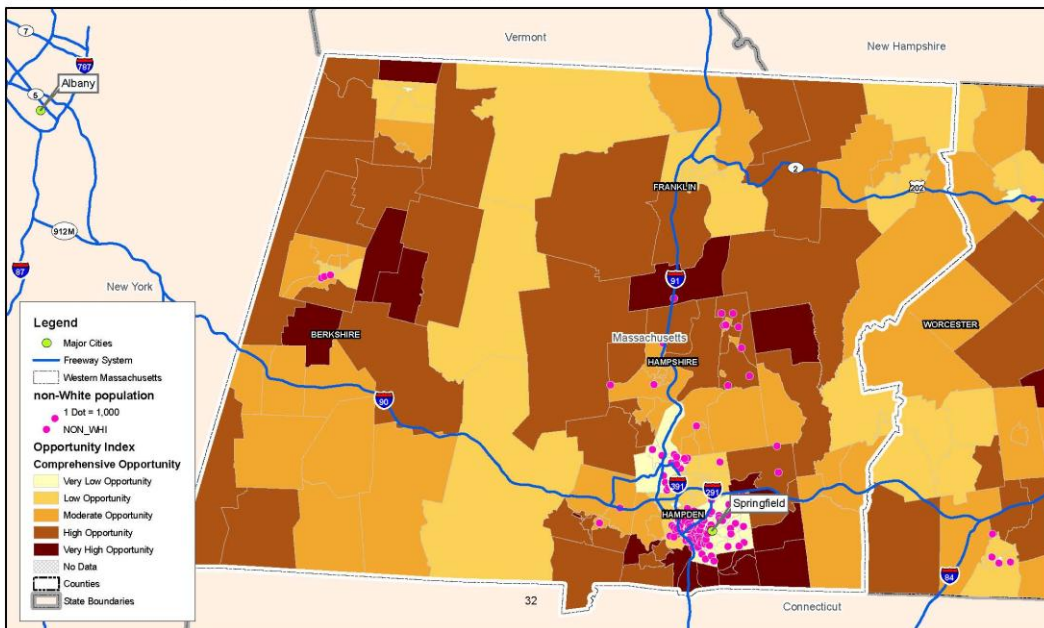
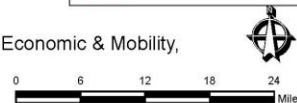


Map 3D: Comprehensive Opportunity Map with non-White population overlay WESTERN MASSACHUSETTS



This map displays the spatial pattern of distribution of opportunity based on Education, Economic & Mobility, and Housing & Neighborhood indicators overlaid with non-White population.

Source: US Census 2000; EPA; MA State Police; HUD Date: July 17, 2008



Using the terms “high opportunity” or “low opportunity” in this document was an explicit decision by the City of Springfield to reframe the discussion on areas concentrated poverty or areas of segregation because the City wants to recognize what they heard from Springfield residents during the process of updating this Analysis of Impediments. The City recognizes that many of its residents choose to live in neighborhoods together, near their family and friends with whom they grew up, because they value their community and being close to one another. The problem is not that some of the City’s neighborhoods are concentrated by people of color; rather the problem is that opportunities—for work, for a good education, for access to public transportation, for access to healthy food—are LIMITED or in some places, completely absent from these neighborhoods. Low opportunity neighborhood is not a euphemism. It is a description that reveals and emphasizes the true problem in these neighborhoods. The problem is not the people who live there. It is the lack thereof and/or the relative quality of necessary infrastructure to support healthy living. The reasons for the continued existence of low-opportunity communities of color are many and complex, and include education, employment, transportation, public safety, and local property tax policies and practices. The Fair Housing Act, therefore, is one tool of many that must be brought to bear to remedy this ongoing civil rights inequity.

PROTECTED CLASSES AND EXPANSION OF FAIR HOUSING PROTECTION

While the Fair Housing Act was originally passed in response to racial discrimination, the Act also includes protections against discrimination based on color, national origin, religion and sex. In 1988, the Fair Housing Amendments Act added protection based on disability and familial status. Massachusetts law includes additional protected classes: marital status, sexual orientation, age, gender identity and expression, military or veteran status, ancestry, genetic information, and receipt of public assistance or rental subsidies.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

The Fair Housing Act’s non-discrimination provisions aim to prevent and impose liability for discriminatory acts. But in order to also address the legacy of past discrimination, the Act requires HUD and its grantees to take steps to “affirmatively further fair housing.” In order to carry out this requirement, the City of Springfield has undertaken this analysis of impediments to fair housing and creation of strategies to address the identified impediments. The City reports annually on its progress toward fair housing goals in its Consolidated Annual Performance and Evaluation Report (CAPER).

PROCESS TO UPDATE THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

The Pioneer Valley Planning Commission (PVPC) updated the City of Springfield’s Analysis of Impediments to Fair Housing during the spring of 2013. The update was funded through a combination of Community Development Block Grant (CDBG) funds provided by the City and District Local Technical Assistance (DLTA) funds provided through the Massachusetts Department of Housing and Community Development. The City’s first AI was completed in 2001 with subsequent revisions occurring in 2003 and 2006.

The framework for this AI is a modified version of the “Suggested Format for the Analysis of Impediments” that is recommended by HUD in its Fair Housing Planning Guide. The PVPC took the following actions to develop this AI:

- Reviewed the City’s previous Analysis of Impediments documents completed 2001-2006
- Reviewed the 2010-2014 Springfield Consolidated Plan and recent CAPERs
- Reviewed the recently completed Pioneer Valley Regional Housing Plan
- Reviewed the Massachusetts Department of Housing and Community Developments Statewide Analysis of Impediments To Fair Housing Access and Consolidated Plans as well as other state policies
- Reviewed the City of Springfield Zoning Ordinance and other city plans and policies
- Solicited information and direct feedback from the following organizations;
 - U.S. Department of Housing and Urban Development
 - Massachusetts Commission Against Discrimination
 - Massachusetts Department of Housing and Community Development
 - Massachusetts Fair Housing Center
 - HAPHousing, Inc.
 - Springfield Housing Authority
 - City of Springfield
- Analyzed quantitative data such as U.S. Census Bureau statistics, the U.S. Bureau of Labor Statistics, Massachusetts Office of Labor and Workforce Development, HMDA, Infogroup and the Warren Group.
- Reviewed fair housing legal background
- Issued a Fair Housing Survey for City residents
- Conducted five listening sessions in the city for residents and service providers
- Participated in two Public Hearings held by the City to obtain comments on the AI Draft
- Participated in a public meeting convened by City Counselor Bud Williams to discuss fair housing issues in the city

FAIR HOUSING SURVEY

This AI gathered information through a Fair Housing Survey that was issued in both English and Spanish. This survey solicited feedback on potentially discriminatory actions experienced by residents when seeking housing within the City of Springfield as well as when seeking housing outside the City. It also gathered information on how well participants felt the City was doing in meeting the housing needs of the community and how well the City was doing including all residents in housing planning processes. The survey was made available on the City of Springfield’s website. It was publicized on the City’s website and through numerous articles in the *Republican* newspaper to direct people to the web-based version. Paper surveys were also distributed to advocacy groups and neighborhood councils and at the first public hearing on this AI.

A total of 526 people completed the survey; 523 were completed in English and three were completed in Spanish. Full survey results, including all open comments received, are included in the Appendix of this Analysis. The following bullet-points summarize the survey’s main findings.

- The most common limitation cited in the survey for residents seeking housing *within* the city of Springfield was the inability to obtain a mortgage to purchase a home (64.7% of respondents).
- The inability to obtain a mortgage was also cited as the most common limitation for residents seeking housing *outside* the city of Springfield (72.9% of respondents).
- When asked what level of effort the city makes to make it easier for everyone who lives in Springfield to find a decent place to live, responses were nearly identical for “good,” “adequate,” and “not good.”
- When asked about the public participation process, the majority of survey respondents (82%) indicated that they have not participated in a city planning meeting.
- When asked what would make it easier to participate, the most common answer (44.3% of respondents) was a preference to participate in an online survey such as this one. The second most common response was a preference for meetings held in their own neighborhood. When reviewing the open-ended comments for this question, participants overwhelmingly stated the need for better notification of when and where meetings would take place.
- About 20% of survey respondents live in the 01109 zip code—the city’s Pine Point, Upper Hill, Old Hill, Bay and McKnight neighborhoods.

LISTENING SESSIONS

In February 2013 PVPC staff contacted service agencies and community groups throughout the city of Springfield offering to conduct listening sessions with their consumers and constituents to discuss this AI update. Caring Health Center, HAPHousing and the Massachusetts Fair Housing Center accepted our offer and assisted with promoting the five listening sessions that were held in the months of April and May 2013. A total of five listening sessions were conducted, three at HAP, one at Caring Health Center and one organized by the Fair Housing Center. There were also two public hearings during which comments on the plan were gathered. Additionally, PVPC had a lengthy phone conversation with a representative from Arise for Social Justice. Notes gathered at all of these meetings are included in the Appendix of this Analysis.

Major themes that emerged from the listening sessions geared towards service providers included:

- Landlords and tenants need more outreach and education on fair housing laws so that both groups better understand their rights and responsibilities.
- A need for stronger enforcement of fair housing laws to deter violations.
- The City should place more resources on code enforcement to ensure residential properties are maintained as safe and decent housing environments. Participants cited the number of deteriorated, abandoned or foreclosed homes and absentee landlords as major factors affecting the quality of life in neighborhoods within the city.
- Mobility counseling for Section 8 or Massachusetts Rental Voucher Program (MRVP) housing voucher holders on their tenancy rights under state and federal law would empower voucher holders to fully maximize their location options. Landlords who illegally refuse to accept housing choice vouchers or rent based on a person’s language prevents was identified as a prevalent form of discrimination in Springfield and the region. Funds are not currently available for mobility counseling in our region.

- Past and existing city, state, and federal housing programs created and continue to perpetuate racial, ethnic and income segregation through their funding policies.
- The Springfield area needs more affordable housing opportunities.
- There is not enough accessible housing for people with disabilities within the City of Springfield and the surrounding communities.

Major themes that emerged from the listening sessions geared towards residents and housing consumers included:

- Deteriorated, abandoned or foreclosed homes and absentee landlords are affecting the quality of life in many of the city's neighborhoods. These blighted properties are a significant contributor to crime.
- Difficulty in obtaining housing if you have Section 8 housing voucher, bad credit or a bad CORI because landlords refuse to rent based on these things.
- A fear of losing housing if one speaks up about problems with the unit. Therefore households are enduring harassment from their landlord and other illegal conditions in order to remain housed.
- There is not enough affordable housing.
- There are not enough public subsidies available to households to help bring down the cost of housing and make housing affordable.
- Neighborhoods with an over-concentration of subsidized housing or with lower-valued housing would benefit from the construction of higher-end housing that would attract middle-income families.
- There is confusion about what the terms affordable housing, market-rate housing, low-opportunity, and high-opportunity mean.

These major themes show the inherent conflicts between the need for more affordable housing and the need for more market-rate housing in the City as well as the need for more affordable and accessible housing opportunities both within and outside the City.

IMPORTANT TERMINOLOGY

Accessible Housing

Housing is "accessible" if it has been designed to allow easier access for people who are physically disabled or vision impaired. Federal law requires that a housing provider make reasonable modifications to the design of a structure, such as installation of a ramp into a building or grab bars in a bathroom. Terms that are related to accessible housing include adaptable housing, barrier-free housing, universal design and visitability.

Affordable Housing	Affordable housing is the general term used to denote housing that is "affordable" if a household pays no more than 30 percent of its gross annual income on housing. Households who pay more than 30 percent of their income for housing are considered cost-burdened and may have difficulty affording necessities such as food, clothing, transportation and medical care. The term affordable housing is often used to denote subsidized housing, which is different, but understandably confusing. Both rental and owner-occupied housing can be affordable.
Subsidized or Income Restricted Housing	Subsidized housing is housing that is restricted to individuals and families with low to moderate incomes. These are the people who traditionally have various social and economic obstacles that make it more challenging to find clean, safe and affordable housing. Income-restricted housing typically receives some manner of financial assistance to bring down the cost of owning or renting the unit, usually in the form of a government subsidy. There are two forms of income-restricted housing: public and private. Public housing is managed by a public housing authority, which was established by state law to provide affordable housing for low-income people. Private housing is owned and operated by private owners who receive subsidies or zoning relief in exchange for renting to low- and moderate-income people.
Market-rate Housing	Market-rate housing is housing with rent levels or sale price levels set by the housing market of the surrounding area. Springfield has a weak housing market, which means that market-rate rents or sales prices are lower than the surrounding suburban communities. Sales prices, in particular, are substantially lower than the surrounding suburban communities. The weak housing market exists in spite of unmet need for housing that is affordable to Springfield residents. A key reason for this disparity is the very low incomes of City residents.
Fair Housing	Fair housing means equal and free access to housing regardless of race, religion, national origin, age, ancestry, military background or service, sex, sexual preference, marital status, familial status, disability, blindness, deafness, or the need of a service dog.

High Opportunity Areas	Areas that provide high quality or highly desirable employment, educational, recreational, and service opportunities.
Low Opportunity Areas	Areas with limited job opportunities or desirable employment as well as limited educational, recreational, and service opportunities and amenities.

III. DEMOGRAPHIC, ECONOMIC, AND HOUSING CHARACTERISTICS

This section of the AI reviews Springfield’s demographic, economic, and housing characteristics in light of the specific categories or classes of people—referred to as protected classes or categories—that are protected from housing discrimination under federal and state law. Title VIII of the 1968 Civil Rights Act makes acts of housing discrimination based on race, sex, national origin, religion, or ethnicity illegal. In 1988, Congress amended Title VIII, making acts of discrimination against families with children and people with mental or physical illness equally unlawful. Massachusetts Fair Housing Law further prohibits discrimination based on marital status, sexual orientation, veteran status, blindness, age, ancestry, hearing impairment, or possession of an assistance dog, such as a guide dog or hearing dog. Additionally, the law prohibits discrimination against individuals or families receiving public assistance or rental subsidies, or because of any of the requirements of these programs.

Protected Categories under Federal and/or State Fair Housing Laws

<u>Federal</u>	<u>State</u>
<ul style="list-style-type: none"> • Race • Color • National Origin • Religion • Sex • Disability • Families with Children 	<ul style="list-style-type: none"> • Marital Status • Sexual Orientation • Age • Gender Identity and Expression • Military or Veteran Status • Ancestry • Genetic Information • Public Assistance • Housing Subsidies or Rental Assistance

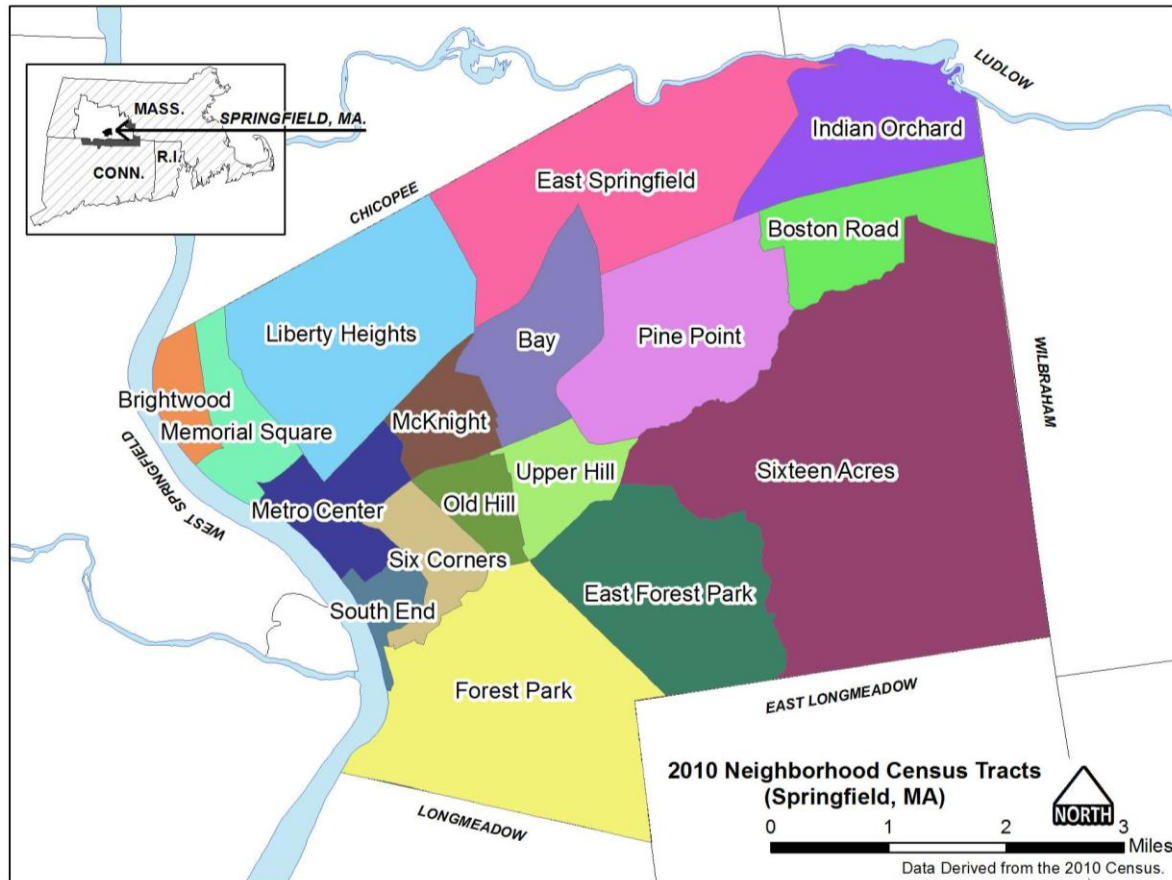
DEMOGRAPHIC CHARACTERISTICS

SPRINGFIELD

The City of Springfield is 37% non-Hispanic white, 20% non-Hispanic black, 39% Hispanic and 3% Asian (2010 Census). Over the last four decades, the City’s racial and ethnic composition has changed dramatically. In 1970, Springfield was 70% white and was a segregated city. Ten of the city’s neighborhoods were predominantly (over 90%) white, while three neighborhoods were over 50% black. Today, Springfield no longer has all-white neighborhoods, and many neighborhoods have white populations between 26 and 50%. The two neighborhoods that still have majority white population are mixed neighborhoods. Sixteen Acres is 62% non-Hispanic white, 19% black, 16% Hispanic, and 2% Asian. East Forest Park is 74% non-Hispanic white, 10% black, 11% Hispanic and 4% Asian. (See the Appendix for maps that show the City’s racial/ethnic composition by neighborhood.)

As with many urban areas throughout this period, the changing demographics are due, in some measure, to decreases in white population and increases in populations of people of color. Springfield’s white population declined by 50% between 1980 and 2010. During the same period, the City had modest 30% growth in black population, and very large 330% growth in Hispanic population.

Figure 1: City of Springfield Neighborhoods



These shifts resulted in many neighborhoods throughout the city transitioning to a mixture of whites, blacks and Hispanics, lacking a large majority of any race. The large Hispanic influx has resulted in Hispanics moving into all neighborhoods, and becoming dominant majorities in some neighborhoods. For example, the North End neighborhoods of Brightwood and Memorial Square are now over 80% Hispanic. Other neighborhoods have a combination of black and Hispanic populations which result in low percentages of whites—for example, Bay and Old Hill are both only 9% non-Hispanic white; both neighborhoods have significant numbers of both blacks and Hispanics.

The Urban Institute 2009 Report *Promoting Neighborhood Diversity* provides a typology of neighborhoods, reflecting relative levels of integration.⁵ The neighborhood types are listed and defined below. Using their typology, Springfield does not have any neighborhoods which are predominantly white, predominantly black, or predominantly Hispanic. The neighborhoods of Springfield that have the highest percentages of whites (East Forest Park and Sixteen Acres) fall into the category that the report defines as “highly diverse”: between 10 and 50 percent minority with no single racial or ethnic group dominating the minority population.

Table 1: Levels of Integration

NEIGHBORHOOD TYPE		SPRINGFIELD NEIGHBORHOOD
Predominantly white More than 90% white		None
Majority-white 50-90% -white	Blacks main minority (more than 60% of all nonwhites)	None
	Hispanics main minority (more than 60% of all nonwhites)	East Springfield
	Other (mixed minority)	Sixteen Acres, East Forest Park
Majority-minority 50–90% nonwhite	Blacks main minority (more than 60% of all nonwhites)	Upper Hill
	Hispanics main minority (more than 60% of all nonwhites)	Indian Orchard, Metro Center, Six Corners, South End, Liberty Heights, Forest Park
	Other (mixed minority)	Bay, Boston Road, Pine Point
Predominantly minority more than 90% nonwhite	Blacks main minority (more than 60% of all nonwhites)	
	Hispanics main minority (more than 60% of all nonwhites)	Memorial Square, Brightwood
	Other (mixed minority)	Old Hill, McKnight
Predominantly black (more than 90% black)		None
Predominantly Hispanic (more than 90% Hispanic)		None

⁵ <http://www.urban.org/UploadedPDF/411955promotingneighborhooddiversity.pdf>

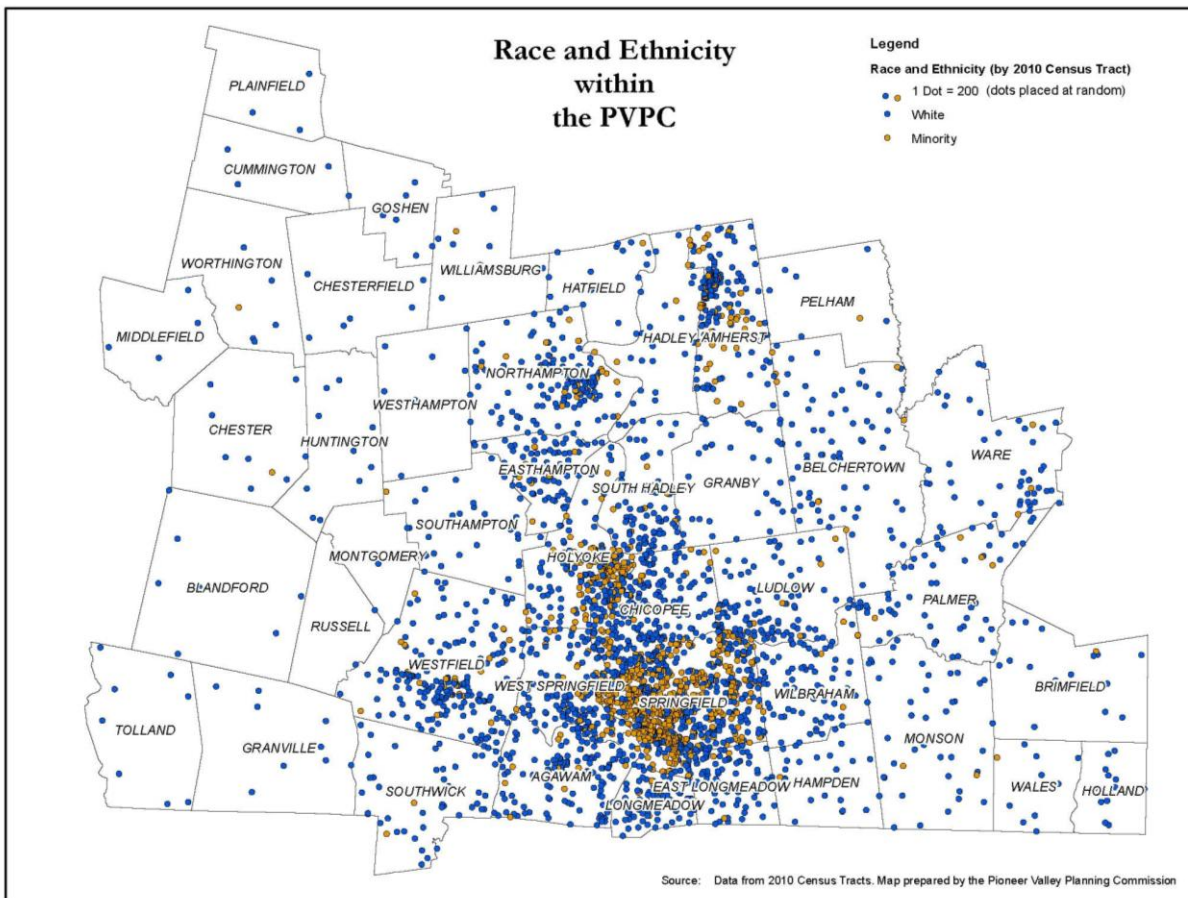
SPRINGFIELD METROPOLITAN AREA

While Springfield itself is diverse, it is located in a highly segregated region. Within the metropolitan area, the City of Springfield is home to 75% of the region’s black residents and over 50% of the region’s Hispanic residents. A number of the communities bordering Springfield are 90% or more non-Hispanic whites. These include Agawam (91% white), Longmeadow (90% white), East Longmeadow (92% white), Hampden (97% white), and Wilbraham (93% white). While describing the presence of white suburban communities outside of urban areas across the nation, *Promoting Neighborhood Diversity* emphasizes the “exclusive” nature of these communities, and notes that they are often economically exclusive as well. The cities of Holyoke and Chicopee are the only municipalities that approach Springfield’s level of diversity.

The growth occurring nation-wide in the Hispanic population is tending to increase this concentration of minorities in Springfield, Chicopee and Holyoke. The region’s Hispanic and Latino population grew by almost forty percent from 2000 to 2010. The majority of this growth, 84%, occurred within these three cities.

The map below illustrates the Pioneer Valley and its racial and ethnic population concentrations.

Figure 2: Pioneer Valley by Race and Ethnicity, 2010



FOREIGN BORN POPULATION & LINGUISTIC ISOLATION

FOREIGN BORN

For some new immigrants or migrants from Puerto Rico, the language barrier can present a significant challenge to finding decent, safe, and affordable housing. In addition to the challenge of linguistic isolation, minorities are also subject to linguistic profiling, which is the practice of using auditory clues such as accent or dialect—for example, over the telephone—to identify race, ethnic origin or other characteristics, which are then used as the basis for discrimination.

The City of Springfield has the largest share of immigrants from places outside the continental United States and migrants from Puerto Rico in the region. The 2007-2011 American Community Survey estimates that roughly 10 percent of the City's population was born outside the United States, excluding migrants from Puerto Rico. Migrants from Puerto Rico make up almost 51,000 of Springfield's residents, or 33 percent of the population. Residents from Vietnam make up the largest portion of the City's foreign-born population. Other significant population groups include individuals from Central and South America, primarily Mexico, Guatemala and Columbia, as well as Southern and Eastern Europe including Italy, Portugal, Poland, and Russian speaking immigrants from the former Soviet Republics. The City is also home to a sizeable population of Eastern African immigrants, including those from Kenya and a significant population of individuals from Barbados. The City and surrounding region has also seen a more recent influx of immigrants from Southeast Asia. The successive waves of immigrant groups to the City typically move into neighborhoods where others from their home country already reside. This pattern creates strong and diverse ethnic neighborhoods but may also have the effect of creating neighborhoods with limited economic means.

According to the New England Farm Workers Council (NEFWC), a majority of the region's 2,000 seasonal workers live in Springfield, and a large majority of these are Hispanic. Seasonal workers live in the Pioneer Valley year-round, with their work schedules and income based on the region's local farming season. There are also approximately 500 migrant workers in the region, but they generally live on the farm at which they are employed.⁶

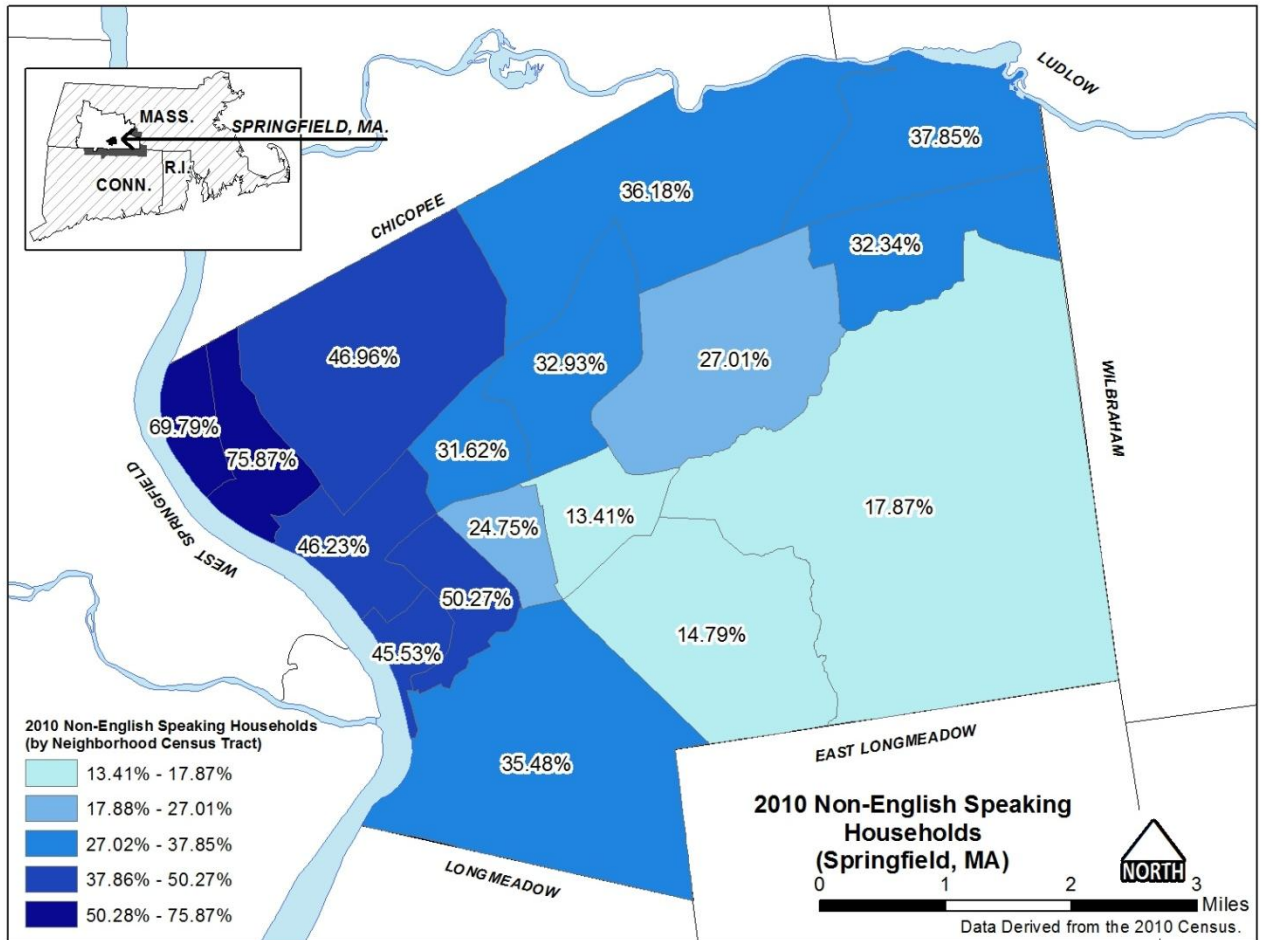
LINGUISTIC ISOLATION

Linguistic isolation—defined as a household in which all members of the household 14 years old and over and have at least some difficulty with English—is a particular concern to equal housing opportunity in Springfield. The 2006-2010 ACS estimated that almost 12 percent of the City's population is linguistically isolated. Overall, the 2006-2010 ACS estimated that almost 40 percent of Springfield's population age five and older spoke a language other than English at home. Nearly 85 percent of these residents are Spanish speakers. As seen on the map below, concentrations of non-English speakers vary widely by neighborhood. The highest concentrations of non-English speakers are in the City's Brightwood and Memorial Square neighborhoods and most of the non-English

⁶ Migrant workers move throughout the year, based on the farm calendar and what farm work is available in different regions of the country.

speakers in these neighborhoods speak Spanish. In the Forest Park and East Forest Park neighborhoods, Vietnamese or another Southeast Asian language are prevalent.

Figure 3: Non-English Speaking Households by neighborhood, 2010



POPULATION BY AGE

Age is a protected class under State Law. In 2010, the median age of Springfield was 32.2, which was lower than statewide median age of 39.1 and the national median age 37.2 years. Springfield’s lower median age reflects the large presence of families with children, which is also a protected class under federal law.

FAMILIES WITH CHILDREN, FAMILIES, AND NON-FAMILY HOUSEHOLDS

Families with children are a protected class under federal law, and Massachusetts has made it unlawful to discriminate based on marital status.⁷ In 2010, just over 60 percent of all households in the City were family households, meaning the household consisted of a householder and one or more other people related to the householder by birth, marriage or adoption. Approximately 30 percent of all households in the City were single-person households and the remaining 10 percent of households were households in which household members were not related to one another.

Over thirty percent of all households in the City had children under the age of 19 living with them. Proportionally, the City had a greater share of family households with children than the region and state as a whole. In 2010, almost 40 percent of all families with children in the City consisted of husband-wife families. Significantly, over 50 percent of all families with children were headed by a single mother and almost ten percent by a single father. Single-parent households may have more difficulty affording a decent and safe place to live because of the reliance on one income to support the family. Springfield had a greater share of single-parent households than both the region and the state.

Table 2: Families with Children, 2010

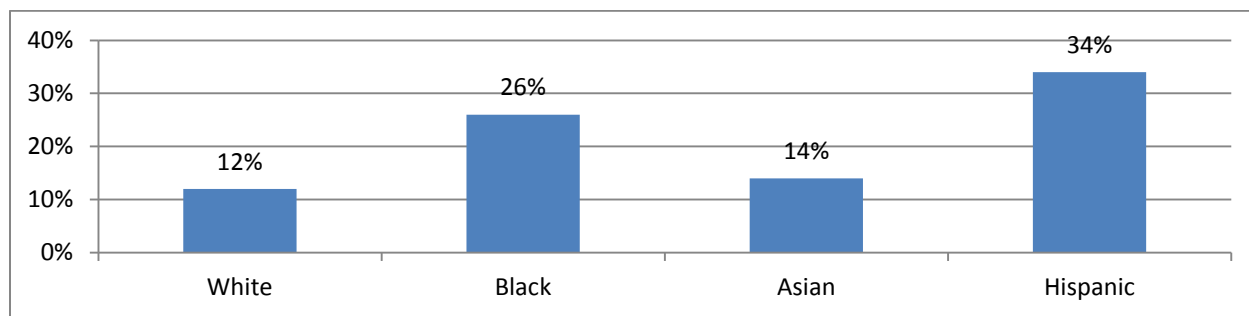
	Families with Children as a percentage of all households	Families with Children		
		Husband-Wife Families with children	Single Father families with children	Single mother families with children
Massachusetts	28%	70%	6%	24%
Pioneer Valley	28%	59%	8%	34%
Springfield	32%	38%	8%	54%

Source: U.S. Census Bureau, 1990 & 2010 Decennial Census

There are wide disparities in the percentage of single mother households when looking across racial and ethnic groups. Approximately one out of every three Hispanic households and one out of every four black households in the City are headed by single mother compared to one out of every nine white households and one out of every seven Asian households.

⁷ Same-sex couple households are included in the family households category if there is at least one additional person related to the householder by birth or adoption.

Figure 4: Percent of Households by Race and Ethnicity that Are Headed by Single Mothers, 2010



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

POPULATION WITH DISABILITIES

Disability is a protected class under federal law. The U.S. Census Bureau defines a disability as a long-lasting physical, mental or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. Many residents with one or more disabilities face housing challenges due to a lack of housing that is affordable and physically accessible.

According to the American Community Survey’s 2008-2010 Estimates, sixteen percent of City residents age 18 to 64 (14,651 people) reported having one or more disabilities. The City had much higher concentrations of persons with disabilities than other communities in the region with the exception of Holyoke and Chicopee. This may be due to the greater availability of social and supportive services, transit services, lower cost housing, and larger availability of rental housing in these communities. Cognitive, ambulatory and independent living difficulties were the most prevalent types of disability. It should be noted that a person may respond to having more than one type of disability.

Over 40 percent of elderly residents in the City (6,928 people) reported having one or more disabilities and this too was higher than the statewide percentage but comparable to Chicopee and Holyoke. Elderly residents had more difficulties associated with hearing, physical ability, and independent living.

Table 3: Percent of Population Age 18 to 64 with a Disability, by Type of Disability (ACS 2008-2010)

Geography	Percent of Population with a disability	Type of Disability					
		hearing difficulty	vision difficulty	cognitive difficulty	ambulatory difficulty	self-care difficulty	independent living difficulty
Massachusetts	9	2	1	4	4	1	3
Pioneer Valley	11	2	2	5	6	2	4
Springfield	16	2	3	8	9	3	6

Source: U.S. Census Bureau, 2008-2010 American Community Survey Three-Year Estimates for Estimated Total civilian non-institutionalized population age 18 to 64 with a disability

Table 4: Percent of Population Age 65 Years and Older with A Disability, by Type of Disability (ACS 2008-2010)

Geography	Percent of Population with a disability	Type of Disability					
		hearing difficulty	vision difficulty	cognitive difficulty	ambulatory difficulty	self-care difficulty	independent living difficulty
Massachusetts	34	14	6	8	21	8	15
Pioneer Valley	37	15	7	8	23	9	16
Springfield	43	14	8	12	30	11	20

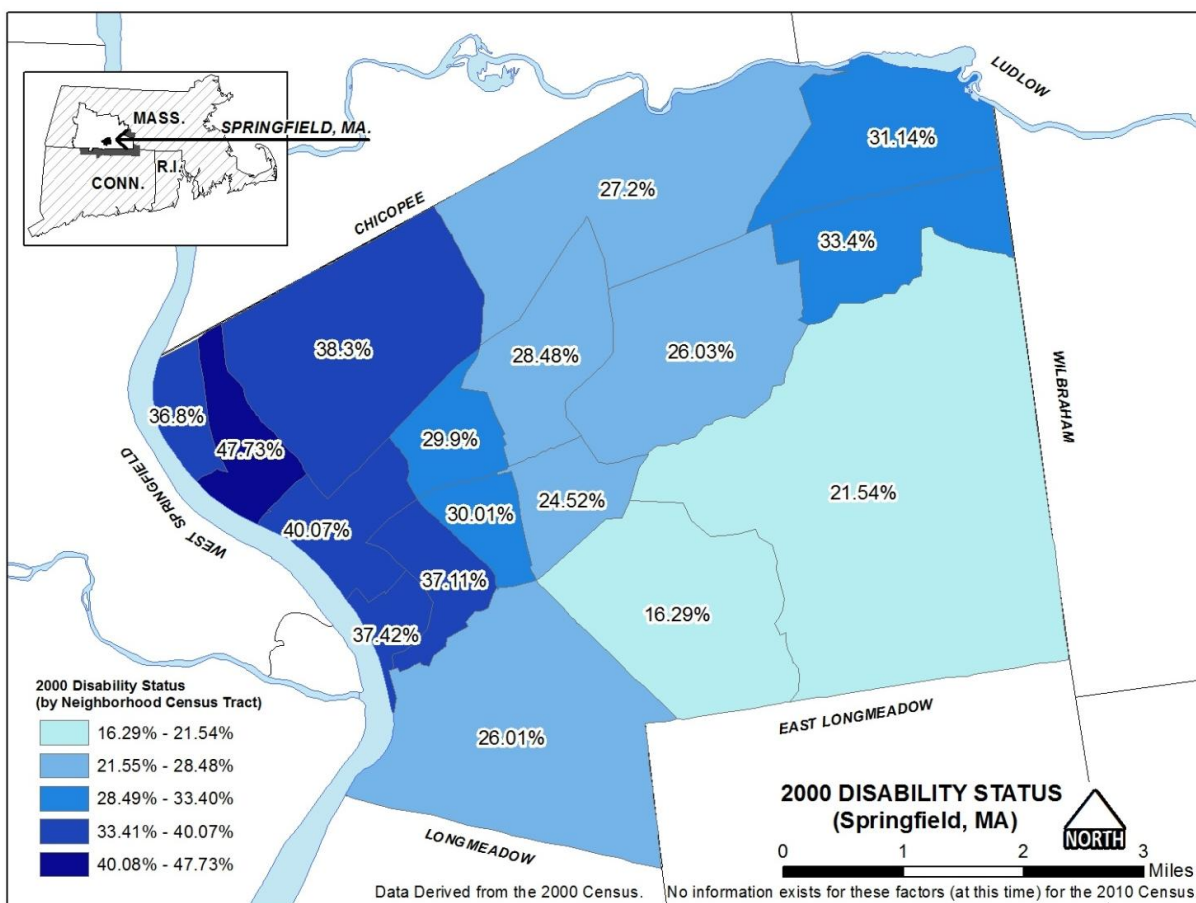
Source: U.S. Census Bureau, 2008-2010 American Community Survey Three-Year Estimates for Estimated Total civilian non-institutionalized population age 65 and over with a disability

The range of disabilities present in the City requires different types of accessible housing to serve the needs of persons with disabilities. There are approximately 8200 residents aged 18 to 64 and 4800 elderly residents with ambulatory or mobility impairments. The number of people with physical disabilities suggests the need for more concerted efforts to integrate accessible housing into planning for housing rehabilitation and development. The 2010-2014 Springfield Consolidated Plan notes that while a variety of services are available to elders to help with independent living needs, existing support systems are overwhelmed. Because the elderly population is projected to increase, an additional burden will be placed on already stretched systems.

Neighborhood level data on disability status has not been updated since the 2000 Census. The map below shows the city's neighborhoods by disability status of the population using data from this year. Using this map, the city's northwestern neighborhoods have higher levels of residents with one or more disabilities.

Listening sessions with service providers highlighted a need for more accessible housing for people with disabilities within the City of Springfield and the surrounding communities.

Figure 5: Disability Status by Neighborhood, 2000



OTHER GROUPS OF FAIR HOUSING INTEREST

HOMELESS POPULATION

Springfield’s January 2013 point-in-time count identified 763 homeless persons, of which 212 were individuals without children and 551 were persons in families with children. The count identified 14 individuals living on the streets, an 86% drop in the street population since 2004.

The causes of homelessness are complex, including both societal factors—such as housing costs that have outpaced income growth and the loss of manufacturing jobs—and individual factors—such as domestic violence, chronic illness, and substance abuse. Housing discrimination can also play a role in perpetuating homelessness. Research and the experience of providers indicate that over the course of a year, many people come into and out of homelessness, averaging about 30 days of homelessness for a particular episode. The 2010-2014 Springfield Consolidated Plan estimates that, in a given year, 1200-1400 adults without children and 500-600 families experience a spell of homelessness. Many incidents resolve fairly quickly with new housing, but a small percentage of households remain chronically homeless or have repeated incidents of housing instability. Usually, the households that experience chronic homelessness are made up of one or more individuals with serious disabilities, including serious mental illness and chronic substance abuse. Over the past several years, the level of

family homelessness in the region has been rising, believed to be caused by a sluggish economy and the high rate of foreclosures over the past several years.

Since 2007, Springfield has been implementing its 10-Year Plan to End Long-Term Homelessness, "Homes Within Reach." The City was also a driving force behind creation of "All Roads Lead Home: A Regional Plan to End Homelessness" produced in 2008, and a founding member the Western Massachusetts Network to End Homelessness. The purpose of all these efforts is to reduce chronic homelessness, reduce street homelessness, and reduce the need for emergency shelter for individuals. They emphasize permanent supportive housing, provided through a Housing First approach, as a better response to homelessness than emergency shelter.

INDIVIDUALS WITH HIV/AIDS

Individuals with HIV or AIDS face housing difficulties because they often require physically accessible housing, which is in short supply, and they often face illegal housing discrimination due to other's fear of their illness. Hampden County has 1761 reported cases of HIV/AIDS. The highest rate of HIV infection in the region is due to injection drug use, so persons with HIV tend to have barriers to obtaining stable housing that are linked to past drug abuse—poor credit, negative landlord histories, and criminal records. While the number of HIV diagnoses reported annually in Massachusetts has been decreasing, the number of people living with HIV/AIDS has been increasing as better treatments have enabled HIV+ people to live longer. Racial and ethnic disparities persist among people living with HIV/AIDS, with black and Hispanic men affected by HIV/AIDS at levels 9 times that of non-Hispanic white males and black and Hispanic females affected by HIV/AIDS at levels 26 and 18 times that of non-Hispanic white females. Because racial and ethnic minorities live in concentrated areas in the region, geographic disparities also persist among people living with HIV/AIDS. Springfield has an average annual infection rate more than double the Massachusetts rate.

ECONOMIC

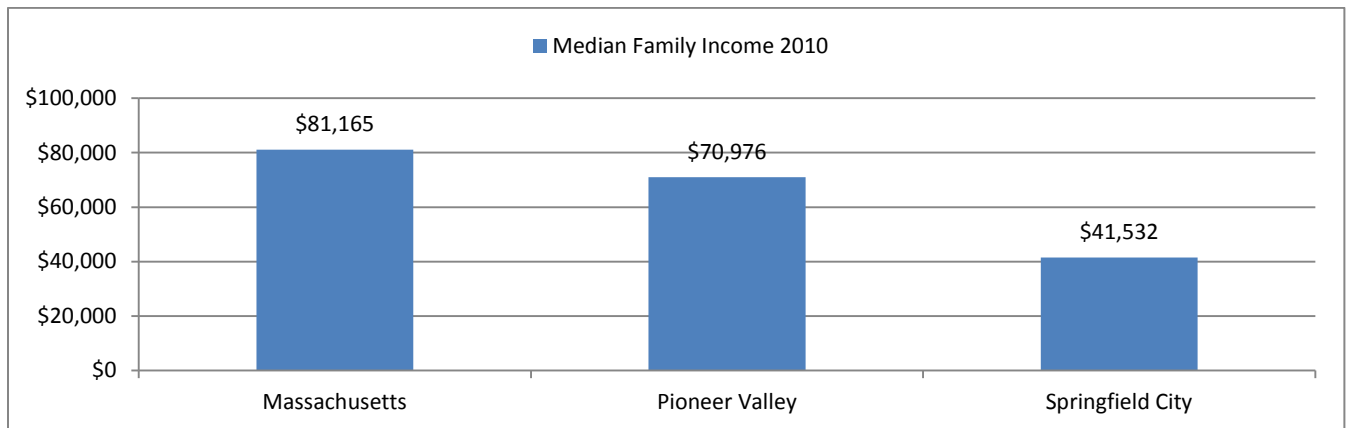
INCOME

OVERALL SUMMARY

The ability to exercise housing choice bears a strong relationship to the amount of money a household can afford to spend on housing. According to American Community Survey figures for 2006-2010, the city of Springfield has the lowest median family income in the Pioneer Valley Region, \$41,532. This is especially striking when viewed in the context of the greater region where the three towns with the highest median family income; Longmeadow (\$104,643), Wilbraham (\$102,557) and East Longmeadow (\$96,383) share a border with the city of Springfield. Median family income for the city of Springfield has historically lagged behind the County, Pioneer Valley region and the Commonwealth. ACS 2006-2010 data shows that Springfield’s median family income (\$41,532) is just over half (51%) of that for Massachusetts as a whole (\$81,165).

Springfield’s family poverty rate was 23 percent in 2006-2010 and child poverty was 44 percent.⁸ This means that two in five children in the city are growing up in households with incomes below the poverty line. The rate of children living in poverty in Springfield is nearly three times that of Massachusetts as a whole.

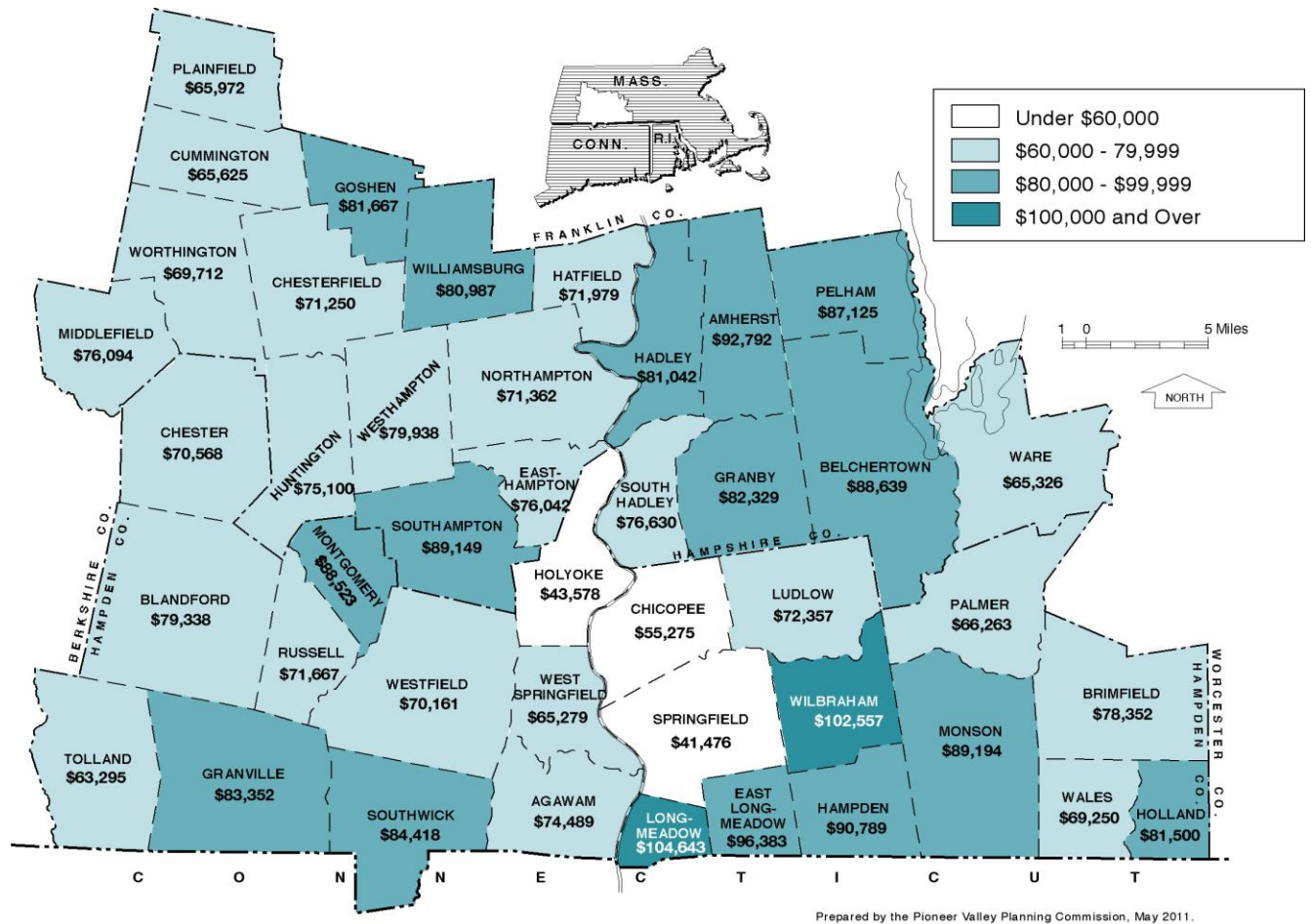
Figure 6: Median Family Income Comparison, 2006-2010



Source: American Community Survey 2006-2010

⁸ The 2010 poverty guidelines were \$11,139 for an individual, \$14,218 for a 2-person household, \$17,374 for 3 persons, \$22,314 for 4 persons, \$26,439 for 5 persons, \$29,897 for 6 persons, \$34,009 for 7 persons, and \$37,934 for 8 persons.

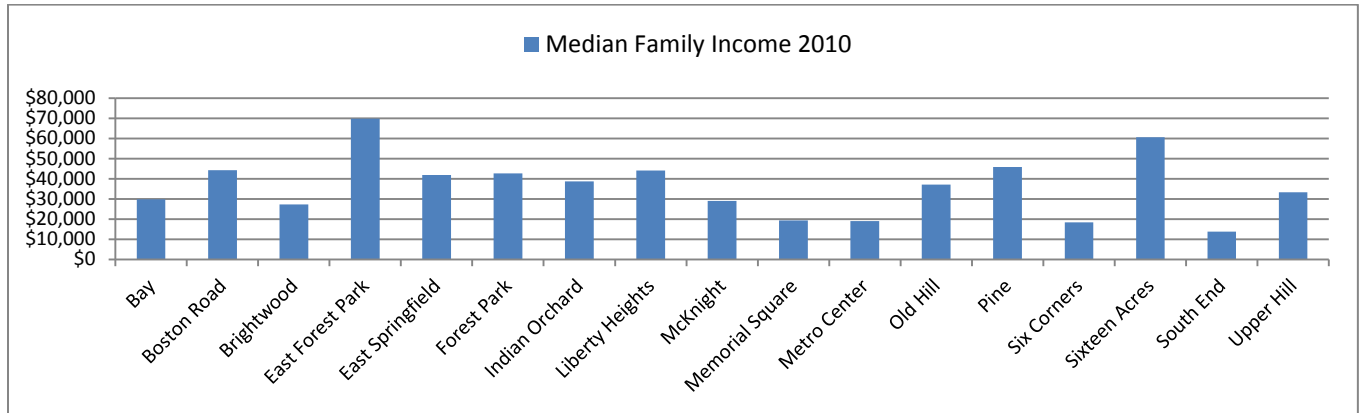
Figure 7: Median Family Income Pioneer Valley 2006-2010



NEIGHBORHOOD SUMMARY

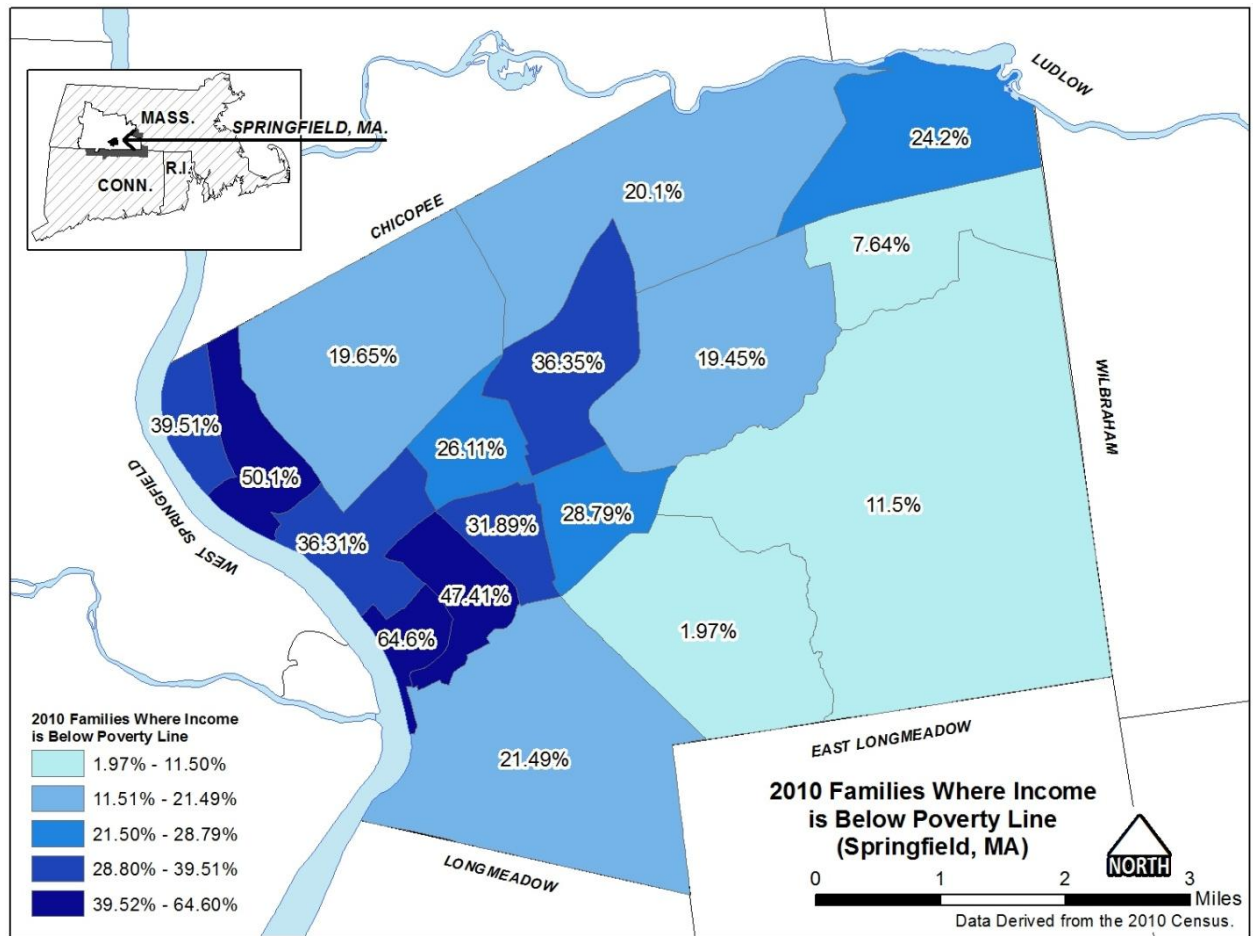
There are substantial income disparities between the Springfield’s neighborhoods. Like many cities, the lowest income neighborhoods are in the city-center while more middle-class neighborhoods circle the periphery. In 2010, the median family income in the City’s South End neighborhood was just \$13,835, while in the City’s East Forest Park neighborhood the median income was \$69,854. Seven of Springfield’s seventeen neighborhoods are areas of poverty concentration, meaning 30% or more of residents live in poverty. Three of these neighborhoods are areas of extreme poverty concentrations with 40% or more of neighborhood residents living in poverty. These extreme poverty neighborhoods are Six Corners (47.4%), Memorial Square (50.1%) and the South End (64.6%).

Figure 8: Median Family Income—Comparison by Neighborhood—2006-2010



Source: American Community Survey 2006-2010

Figure 9: Springfield Families below Poverty Level 2010



EMPLOYMENT & EDUCATION

Many studies recognize the relationship between the concentration of needy households in a community and the low levels of educational attainment of its residents. In today's economy, a high school education is the minimum requirement to participate effectively in the job market. Almost 87 percent of the region's population over the age of 25 was at least a high school graduate and almost thirty percent had at least a bachelor's degree. In comparison, only 81 percent of Springfield's population over the age of 25 had at least a high school graduate and less than 20 percent had at least a bachelor's degree. The Springfield, Chicopee, and Holyoke public school districts were also the only school districts in the region with drop-out rates that exceeded five percent. In 2012, Springfield's dropout rate was 10%.

Low educational attainment is the leading factor creating the jobs-to-skills mismatch of Springfield's residents. In 2010, the City's labor force amounted to over 66,000 people, and the city contained over 74,000 jobs, which was almost 30 percent of all the region's jobs. Yet, the city had an unemployment rate of 12.6% in 2010, and this statistic does not include the number of residents who were underemployed. Therefore many of the city's residents are not benefiting from their proximity to the region's leading employers.

Table 5: Pioneer Valley Region's Top 10 Employment Centers for 2010

Community	Total Employment	Percent of Region's Employment	Average Weekly Wage
Springfield	74,409	29.50%	\$928
Holyoke	21,716	8.60%	\$730
Chicopee	18,779	7.40%	\$772
Northampton	18,040	7.20%	\$808
West Springfield	16,764	6.60%	\$727
Westfield	16,624	6.60%	\$797
Amherst	14,820	5.90%	\$843
Agawam	11,637	4.60%	\$744
East Longmeadow	7,949	3.20%	\$794
Ludlow	6,412	2.50%	\$774

PUBLIC TRANSIT SERVICE

Transit service is important to the economic self-sufficiency of Springfield residents, as well as the people of the region, because it provides reliable access from home to work, school, shopping, medical appointments and other necessary destinations. The Pioneer Valley Transit Authority (PVTA) provides scheduled bus service and on-demand van service in Springfield and 23 other communities in the region. PVTA rider surveys report that its customers are highly "transit dependent": almost 70 percent

of riders do not own a car. In addition, more than half of PVRTA riders in Hampden County are near, at, or below the poverty level.⁹

PVRTA's bus service in Springfield consists of 18 regular ("fixed") routes that travel through the city and adjoining communities; three of these offer express trips. Almost all routes originate or have an intermediate "hub" stop at the Springfield Bus Terminal at Main and Liberty Streets in downtown, which allows transfers between routes. PVRTA bus service reaches every neighborhood in Springfield although service frequency and service availability varies depending on the route. Figure 10 shows bus service frequency.

PVRTA provides two types of van service in Springfield. The first is ADA (American's with Disabilities Act) complementary paratransit service. ADA van service is federally required to be available to people with disabilities who are not able to use fixed route buses regularly or at all. ADA van service is available during the same times that the nearest fixed route bus operates to residents who live and are traveling to destinations that are within 3/4 of a mile of a fixed bus route. In Springfield, this 3/4-mile radius covers almost the entire city. The second type of van service is commonly known as "Dial-a-Ride." This service is available to all people age 60 and older Monday through Friday from 8:00 a.m. to 4:30 p.m. on a space available basis (ADA riders must receive priority).

There are four key issues that limit the use of the PVRTA system by residents of Springfield:

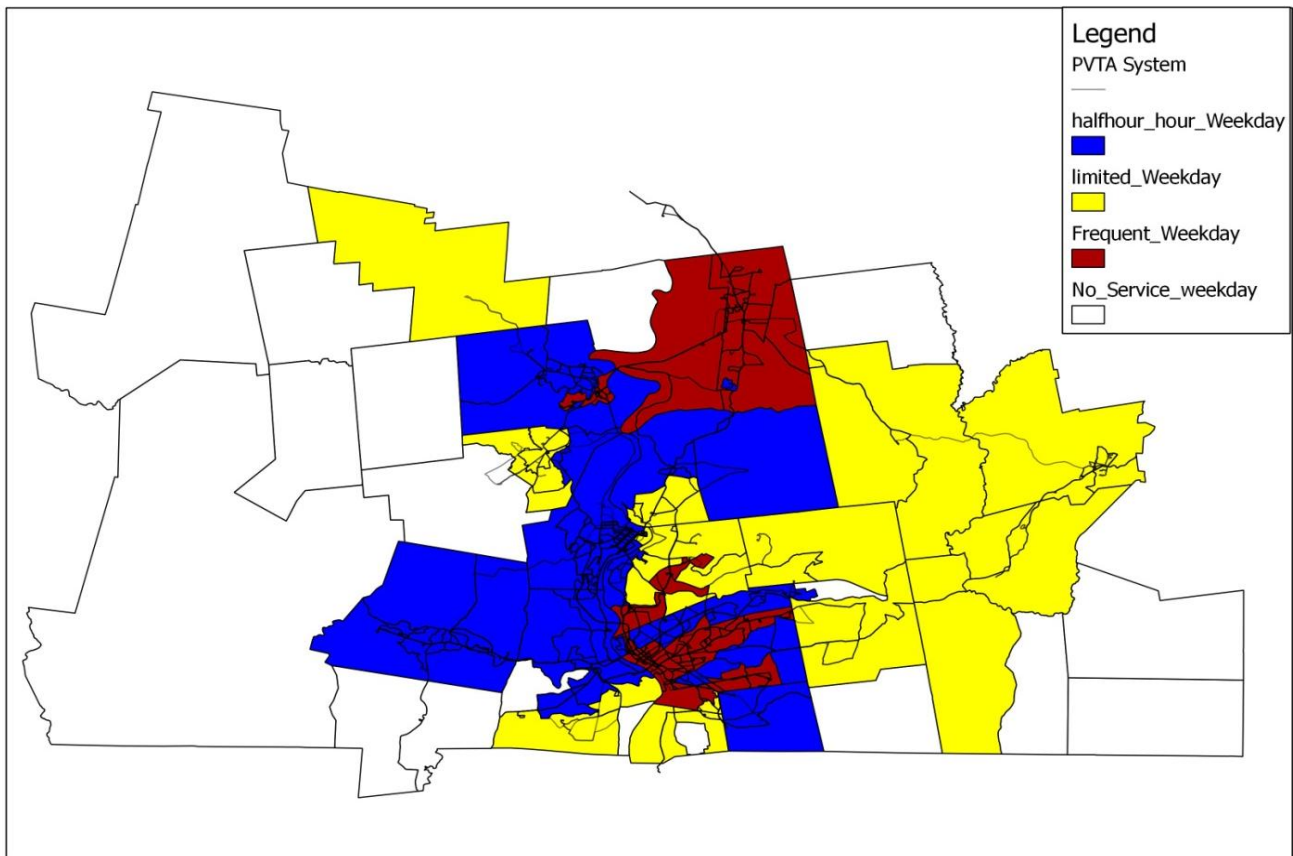
1. Buses do not run often enough to adequately serve working residents. In some city neighborhoods, the service "headways" (time between buses) can be as long 60 minutes.
2. Springfield's bus routes form a hub-and-spoke pattern, which means that travel from many neighborhoods to major employers—hospitals, Big Y and MassMutual, colleges and universities—and other destinations within Springfield requires a trip and/or transfer through the downtown bus terminal. In many cases, a trip that takes 15 minutes by car last an hour or more by bus.
3. Bus travel times from Springfield to major employers outside of the city are prohibitively long. Using PVRTA, it would typically take a Springfield resident about two hours to reach UMass Amherst by bus—while the same trip by car would take only 40 minutes.¹⁰ Peter Pan Bus Lines does offer an express service to Amherst (via Northampton) that takes approximately 50 minutes, but this service costs \$32 round trip.
4. Buses operate on reduced frequencies or not at all during evenings (after 7PM) and weekends. This greatly limits the ability of residents who work a second shift, night or weekend job to use public transportation for commuting; it also limits the ability of many people to attend church services.

⁹ "PVRTA Onboard Customer Survey Southern Service Region" can be downloaded here: http://www.pvpc.org/resources/transport/08_report/PVRTA_south_region_survey.pdf.

¹⁰ PVRTA Title VI Program Update 2012, July 1, 2012

The PTVA Advisory Board is comprised of 24 voting members from each of the communities to which PVTA provides service. Springfield’s current representative is Wayman Lee, Esquire, the City Clerk, who is designated by the Mayor. Votes on the PVTA Advisory Board are weighted in proportion to the amount of service/route miles in each community, so Springfield, which has the most service of all 24 PVTA towns, has a vote that accounts for approximately 25 percent. As a result, the City of Springfield has a unique ability to strongly guide PVTA’s services and management.

Figure 10: Draft Analysis of PVTA Weekday Service Analysis by Census Tract (January 2013)



Source: Pioneer Valley Planning Commission, Draft, January 2013

Note: Frequent Weekday service (red) means less than 1/2 hour service frequencies. Half-Hour Weekday Service (Blue) means half hour to one hour service frequencies. Limited Weekday frequencies mean one hour or more service frequencies.

MUNICIPAL FISCAL HEALTH

Local governments in Massachusetts are responsible for providing a variety of public services such as fire and police protection, education, road maintenance, and parks. Municipalities primarily fund these services through local revenues, primarily the tax levy on property (property taxes), and state aid. Studies through the Federal Reserve Bank of Boston’s New England Policy Center (NEPPC) show that Springfield’s per capita municipal costs are higher than the average Massachusetts community because of service demands created by the city’s comparatively high poverty rate, unemployment rate,

population density, and jobs per capita.¹¹ The City's ability to raise local revenues for its public services is more constrained than most municipalities in the state because its revenue-raising capacity is largely determined by local property values and local residents' income—both of which are comparably low.¹² The difference between the costs of providing local public services and ability to raise revenues from local sources for these services is the municipal fiscal gap.

The NEPPC has recently determined that the state's ten largest cities, including Springfield, do not receive their fair share of unrestricted municipal state aid to help fill these municipal fiscal gaps.¹³ They show that these cities face large gaps between their costs of providing municipal services and their capacity to raise revenues locally. The NEPPC has suggested that the state legislature consider adopting a formula that provides more aid to communities facing larger municipal gaps, but holds existing aid that communities receive harmless to avoid disrupting local budgets. The formula that they recommend would continue to allocate existing state aid as-is but use a gap-based formula to distribute new aid, with more of the new aid allocated to higher-gap communities. Their model shows that "if the state commits to reasonably large increases in municipal aid, this new approach can be both equalizing and beneficial to a majority of municipalities in the Commonwealth within a relatively short time period." Legislation to establish this potential aid formula has been introduced each year during the Patrick administration so it is important for the City of Springfield's elected officials to be mindful of the bill's progress. The PVPC and the Pioneer Valley's Plan for Progress also supports the Federal Reserve's efforts to publicize their findings and considers statewide fiscal equity to be one of the region's leading strategies toward a strong, vibrant regional economy.

¹¹ Bradbury, Katherine, and Bo Zhao. 2009. "Measuring Non-School Fiscal Disparities among Municipalities." *National Tax Journal* 62(1):25-56. In Zhao's July 2010 report "Does Springfield Receive Its Fair Share of Municipal Aid? Implications for Aid Formula Reform in Massachusetts," he provides the following examples of how these factors affect costs. He writes, "For instance, higher population density and poverty and unemployment rates tend to increase costs for fire protection, because housing that is closely packed and poorly maintained creates a greater fire hazard than housing that is widely spaced and well maintained. The costs of providing police protection rise with poverty and unemployment rates, because low-income communities and those with higher unemployment rates tend to have higher crime rates. The number of jobs per capita indicates cost pressures from employers and workers who commute into the municipality, and who consume municipal services (including roads and police and fire protection) along with local residents."

¹² For example, the average value of a single family home in Springfield was around \$127,000 in 2013 and the tax rate was 19.71. In Longmeadow, the average value was \$341,789 in 2013 and the tax rate was 21.54. Bradbury and Zhao (2009) of the NEPPC wrote that "The income levels of local residents constrain their ability to pay for local public services, and therefore their willingness to increase property taxes to support those services by passing overrides of the local levy limit imposed by Proposition 2 ½ (a local property tax limitation in Massachusetts). Local governments in lower-income communities are therefore less able to tap into their property tax bases, resulting in a lower property tax capacity for given property values."

¹³ Zhao, Bo. 2010. "Does Springfield Receive Its Fair Share of Municipal Aid? Implications for Aid Formula Reform in Massachusetts." Community Development Discussion Paper no. 2010-02. Boston: Federal Reserve Bank of Boston."

HOUSING SUPPLY CHARACTERISTICS

The city of Springfield is known as the ‘City of Homes’ due to the beauty and diversity of its residential architecture. According to American Community Survey data for 2006-2010, the City contained 63,027 units of housing. The data analyzed in this section, much of which was taken from the U.S. Census Bureau 2010 Decennial Census and 2006-2010 American Community Survey data, does not reflect the housing losses experienced by the City as a result of the June 1st 2011 tornado. At two years post-tornado, the City has permanently lost a total of 100 rental units and 24 owner-occupied units. In addition, the City has lost 74 units of public and subsidized housing. While all of these affordable public and subsidized units will be replaced, the complexity of regulations and the financing of these projects mean that the replacement units are still in the planning stages.

One of the main revitalization challenges facing Springfield is its weak housing market. Low housing values do not justify the cost of capital or maintenance improvements to properties by homeowners and landlords. This has led to vacant or deteriorating housing which adds blight to the city’s neighborhoods and creates unsafe living conditions for residents.

The weak housing market exists in spite of unmet need for housing. A key reason for this disparity is the very low incomes of City residents. There is tremendous demand for existing affordable housing units, and these programs all maintain waiting lists. The strong demand for affordable housing units and lack of sufficient supply of these units is a statewide issue. The depressed housing market also makes it difficult to develop or redevelop housing for households that would pay market rent, and there may be some pent up demand for these units. City officials have reported that there is anecdotal evidence of young professionals, empty-nesters, or two person households who desire apartments to rent or condominiums to buy in the City but that the supply of quality units does not meet the demand.

Housing developers point to the problem that rents are typically insufficient to support the cost of new construction or significant rehabilitation of multi-unit housing. In addition, almost all state or federal public subsidies that developers could use (if and when they are available) require income-restricted housing as a condition of receipt of these funds or entail other restrictions that are good practice in strong housing markets, but, in Springfield, they serve as one more barrier to attracting an economically diverse population to urban neighborhoods and to increasing home-ownership rates.

The City’s depressed or weak housing market is an outcome of several interrelated and reinforcing factors: crime and safety issues, the quality of public education, the concentration of income-restricted housing and households with housing choice vouchers, and the unemployment/underemployment of existing residents, which limits their economic means to invest or to afford housing.

Listening sessions with residents and service providers showed that there is a strong belief that the City should place more resources on code enforcement to ensure residential properties are maintained as safe and decent housing environments. Participants cited the number of deteriorated, abandoned or foreclosed homes and absentee landlords as major factors affecting the quality of life in neighborhoods within the city.

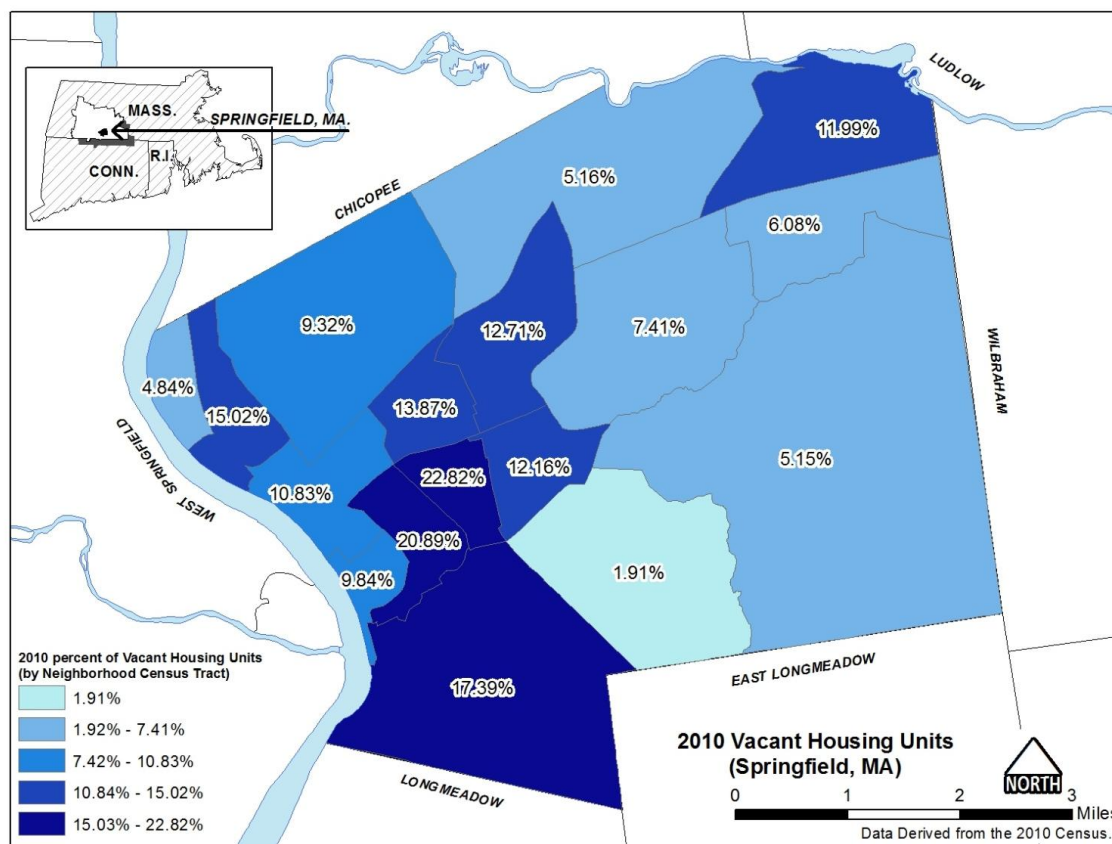
HOUSING VACANCY, FORECLOSURES AND BANK-OWNED HOMES, AND BLIGHT— SIGNS OF A WEAK HOUSING MARKET

HOUSING VACANCY

Vacancy status is used as a basic indicator of the housing market and provides information on the stability and quality of housing for an area. Too many vacancies, a key sign of a weak housing market, depress home values, and concentrations of vacant homes can destabilize neighborhoods creating areas of distress, which is a situation affecting particular areas in Springfield. According to American Community Survey data for 2006-2010 the vacancy rate for the City of Springfield was almost 11 percent in 2010. This proportion was significantly higher than the rate for the Pioneer Valley region at 7 percent and also higher than the vacancy rate for the Commonwealth as a whole at 10 percent. Put in another way, one out of every ten housing units in the city was vacant in 2010.

The City’s high housing vacancy rate is a result of the housing crisis that started in 2008 and is still unfolding. Springfield’s vacancy rate climbed from 7 percent in 2000 to 11 percent in 2010. While the vacancy rate increased in nearly all neighborhoods between 2000 and 2010, certain neighborhoods were particularly affected, including the Six Corners and Old Hill neighborhoods which have rates of just over 20 percent.

Figure 11: Vacant Housing Units by Neighborhood, 2010



FORECLOSED & BANK-OWNED HOMES

In 2010 residential foreclosures in the city of Springfield accounted for almost 50% of all residential foreclosures in the Pioneer Valley region. While the region's central cities as a whole were disproportionately affected by the foreclosure crisis, during the same year foreclosures in Chicopee only accounted for 8% of the region's total, while Westfield accounted for 5% and Holyoke just 4%.

While the economic recession and rising unemployment undeniably exacerbated the increase in the number of foreclosures, it is well-understood that predatory, sub-prime lending was a leading factor in our city centers and certainly in Springfield. Such lending targeted lower-income and minority households in the City.

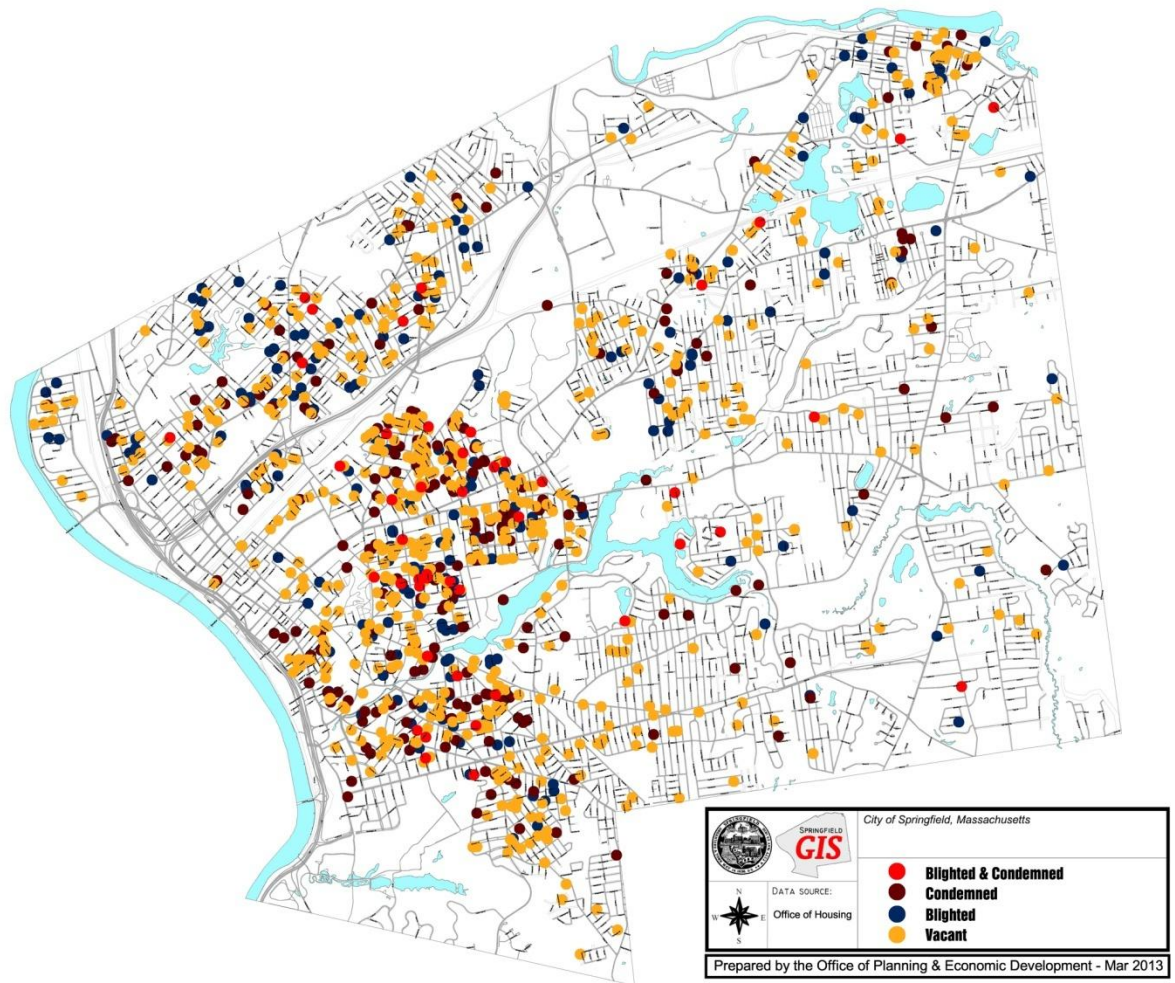
Neighborhoods with very low homeownership rates experienced high levels of foreclosure. This is an indication that investor-owned properties have also been subject to foreclosure. Within these low homeownership neighborhoods, investor-owned properties were frequently bought and sold in the lead-up and through the housing crisis, and it is believed that irresponsible lending practices enabled investors to easily become overextended, taking on more properties than they could maintain.

Bank owned homes (also known as real-estate owned or "REO's") result when the foreclosed home remains with the bank instead of being sold to a new owner. According to Federal Reserve Bank of Boston data, the number of REO's in the City of Springfield increased by 570 percent from 30 homes in 2005 to 201 homes in 2010. Almost all municipalities in the region saw a significant increase during these five years. REO's accounted for less than one-half percent of the region's and the city of Springfield's housing stock.

BLIGHT

A recent survey completed in the spring of 2013 by the City of Springfield yielded a list of 1,162 properties characterized as blighted, vacant and/or condemned. The following map shows the locations of properties classified as blighted, vacant and/or condemned during the City's survey. This survey did not distinguish residential from commercial and industrial properties and is shown here to underscore concentrated areas of market instability.

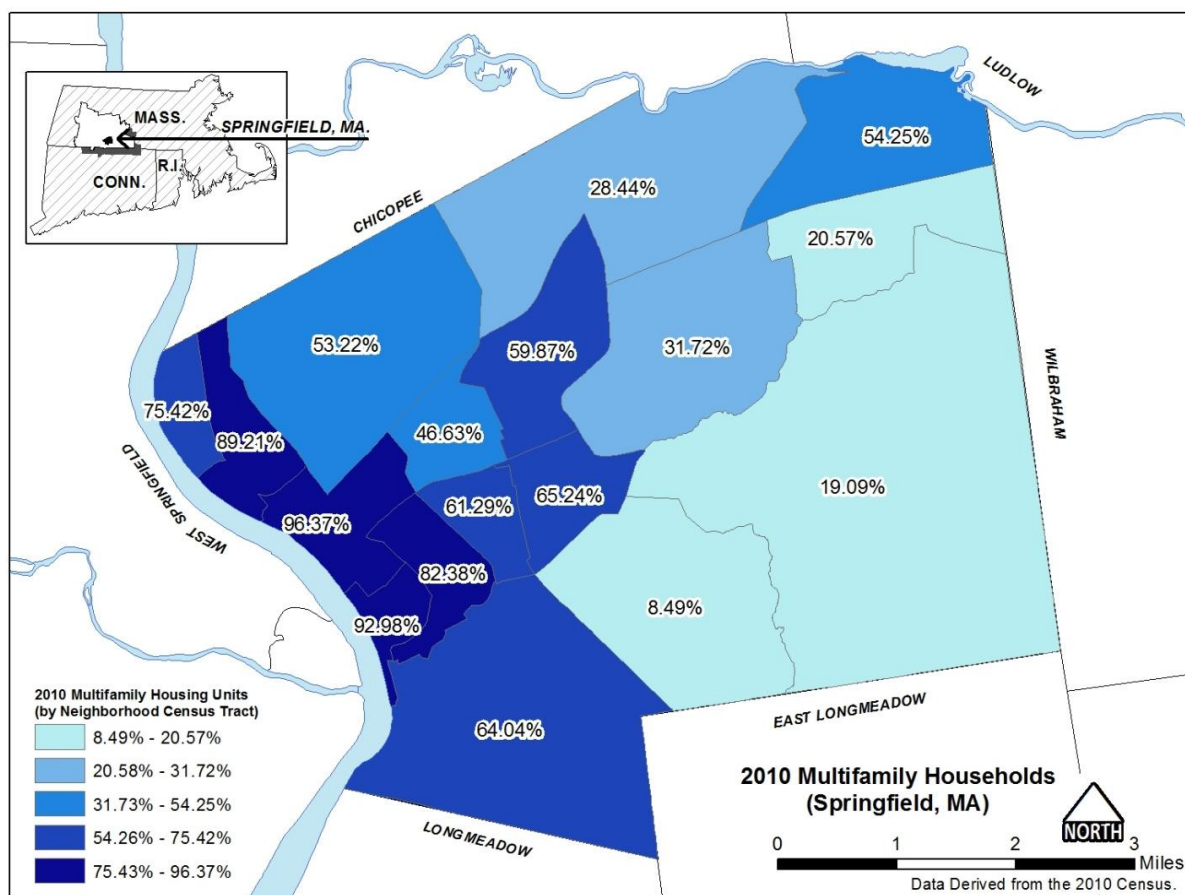
Figure 12: Blighted, Condemned & Vacant Properties – Spring 2013



HOUSING BY STRUCTURAL TYPE—SINGLE & MULTI-FAMILY HOUSING

Housing affordability is closely related to the housing structure type. Multi-family housing, two-family housing, and smaller single family homes on smaller lots tend to be more affordable to a wide range of households than larger single family homes on large lots. Almost fifty percent of all housing units in Springfield are single family homes while the remaining fifty percent of all housing units are within two-family, three-family and multi-family structures. By comparison, about 60 percent of the region's housing consists of single-family detached homes, with most communities having rates above 80 percent. Communities with the highest percentage of single-family homes with rates over 90 percent include two of Springfield's neighboring communities—Longmeadow and East Longmeadow—as well as the region's small rural communities. This regional comparison underscores the problem that the region's suburban and rural communities do not offer their fair share of multi-family housing opportunities.

Figure 13: Percentage Multi-Family Housing by Neighborhood 2010



Similar to other city trends, predominant housing types vary widely by neighborhood. Neighborhoods with the greatest concentration of single family homes include the more suburban city neighborhoods of East Forest Park, Sixteen Acres and Boston Road. Neighborhoods with greatest concentration of housing with two or more units include the City’s older and more urban areas of Metro Center where over 96% of units are multi-family, the South End with nearly 93% and the Memorial Square neighborhood where over 89% of housing units are multi-family units. The map above shows the concentration of multi-family housing units by neighborhood.

OWNER-OCCUPIED AND RENTER OCCUPIED HOUSING

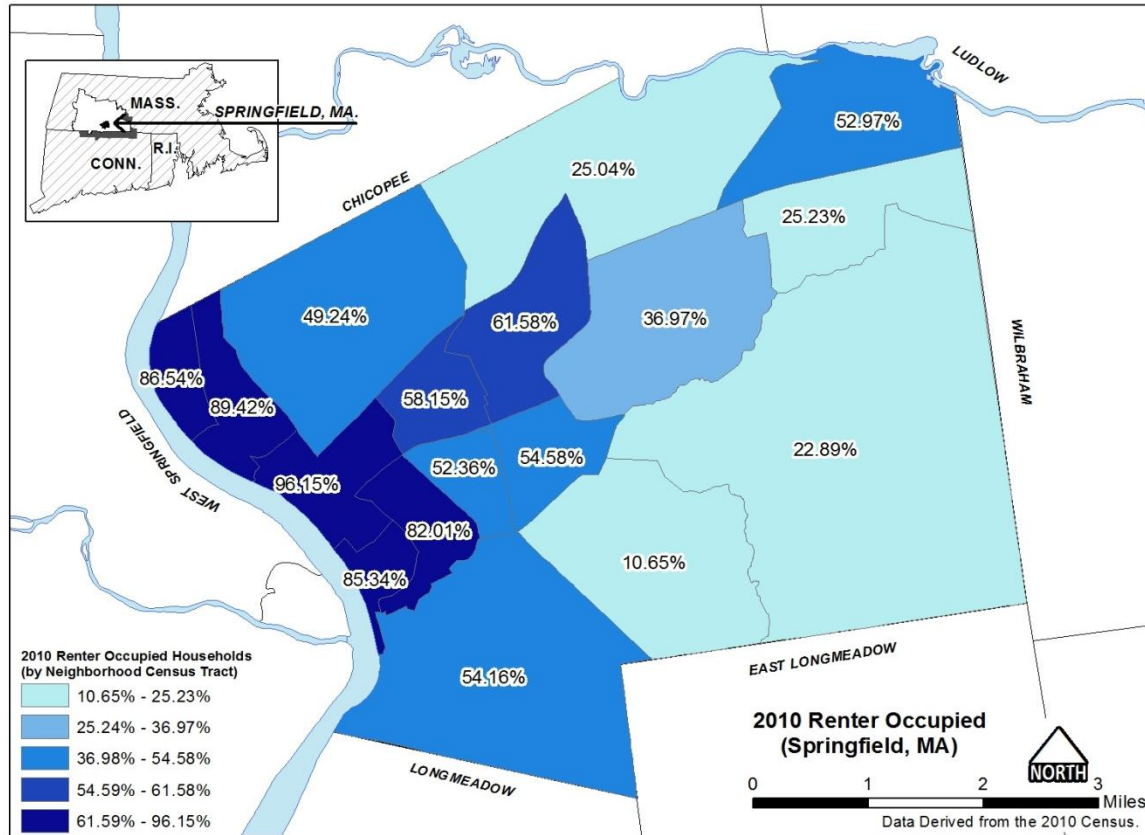
Home ownership is a significant indicator of economic security because the primary financial investment for the vast majority of people in this country is their homes. In 2010, just over 50 percent of all housing units in the city were owner-occupied. Within the Pioneer Valley, homeownership rates were much higher in the rural areas and suburbs than in the region’s small and major cities, which is typical nationwide. Over half of the communities in the region had more than 80 percent owner-occupied housing. Again, this regional comparison underscores the problem that the region’s suburban and rural communities do not offer their fair share of rental housing opportunities.

Most community assessment tools consider an optimal homeownership to rental housing balance for neighborhood and housing market stability to be 70 percent homeownership and 30 percent rental. More than 30 percent rental housing could indicate a need for more additional homeownership units in the neighborhood and more than 70 percent homeownership could indicate a need for additional rental housing. The amount of owner-occupied housing as compared to renter-occupied housing greatly varied by neighborhood in 2010 with the older urban neighborhoods having the lowest rates of owner-occupied housing ranging from as little as four percent in Metro Center to 6.8 percent in the South End. The City's suburban neighborhoods had much higher rates including the East Forest park neighborhood which contained almost 90 percent owner-occupied housing and Sixteen Acres where just over 75 percent of units were owner-occupied. When owner-occupancy rates are compared between 2000 and 2010 Census figures, the majority of city neighborhoods experienced either an increase in owner occupancy or rates that remained unchanged.¹⁴ The City has several programs that aim to improve the level of owner-occupancy in the urban core neighborhoods. A homeownership production program funds nonprofit developers to build new or rehabilitate existing homes to be sold to owner-occupants. The City's historic rehabilitation program and sale of tax-title property program require the homes be sold for homeownership.

Rental housing stock within Springfield is largely pre-1940 stock in larger multi-family apartment blocks or in old homes converted from single family occupancy to multi-family occupancy. Generally these properties are in need of modernization and in some cases significant rehabilitation. This stock has limited utility as housing for people with disabilities. It should also be noted that over fifty percent of the renter-occupied units in the city (28,513 units) are occupied by a household with a housing subsidy, meaning the household is living in a rental unit set-aside for an income-restricted household or is living in a rental unit rented with a Section 8 rental assistance housing voucher.

¹⁴ From 2000 to 2010, the Metro Center, Sixteen Acres and upper Hill neighborhoods saw decreases of less than 1 percent, while the Brightwood neighborhood saw a 3 percent reduction in owner occupancy and the South End experienced a 9 percent reduction in the percentage of owner occupied housing units.

Figure 14: Rental Levels by City Neighborhood, 2010



HOMEOWNERSHIP BY RACE

In 2010, almost 60 percent of white households in the City owned their home, but for non-white households and Hispanic households homeownership rates were much lower (Table 6). Racial and ethnic minorities in the City became homeowners in large numbers during the 1990s, and continued to do so since 2000, many taking advantage of first-time homebuyer programs offered by the City, the State’s lenders, and quasi-public agencies. Despite these impressive gains, some of this increase was the result of predatory subprime lending, which placed some minority households in a precarious financial situation that was not sustainable over time.

Table 6: Homeownership Levels by Race and Ethnicity, 2010

	All	White	Black	Asian	Other Race	Two or More Races	Hispanic
Total	56,752	32,277	12,333	1,031	9,205	1,906	18,569
Owner	50%	61%	42%	53%	22%	36%	25%
Renter	50%	39%	58%	47%	78%	64%	75%

Black homeownership is highest in the Mason Square neighborhoods. Approximately 70 percent of homeowners in the Upper Hill neighborhood and almost 75 percent of homeowners in the McKnight neighborhood are African American.

HOUSING COSTS

The extent to which housing is affordable matters greatly to any community. Housing is a basic human need and one of the most significant expenditures for any household. Households who pay more than 30 percent of their income for housing are considered “cost-burdened” and may have difficulty affording necessities such as food, clothing, transportation and medical care as well as saving for their future. More than 38 percent of homeowners and 60 percent of renters in the City of Springfield spent more than 30 percent of their income on housing related costs in 2005-2009.

HOMEOWNERSHIP COSTS

The flip side of Springfield’s weak housing market is that homeownership is affordable to many moderate income households. According to the Warren Group, in 2012 the median sale price for a residential unit in the City of Springfield was \$99,529. This is nearly \$50,000 less than the median sale price for Hampden County as a whole and less than half of the median sale price for a home in Hampshire County. The low median sale price is somewhat misleading since the median takes into account short-sales and other foreclosure related sales that have the overall effect of lowering the city’s median sale price. Still, there are many homes available for purchase from \$120,000 to \$200,000.

Table 7: Median Sale Price for All Residential Units, 2012

Community	2012 Median Sale Price All Residential Units
Hampden County	\$148,475
Hampshire County	\$220,000
Springfield	\$99,529

Source: Warren Group

Although the cost of owning and maintaining a home is affordable to most households earning the median income for the city, homeownership is beyond the means of most low- and moderate-income households. Given current economic conditions, the ability to obtain financing can be challenging for today’s first-time homebuyers. In general, household incomes have not kept pace with increased housing costs. The lack of affordable homeownership opportunities across the region has been identified as a region wide impediment to fair housing in the Regional Housing Plan because it has the effect of discouraging low- and moderate-income homebuyers who are disproportionately racial, ethnic, and language minorities.

Listening sessions with residents highlighted a need for more housing that is affordable and for more public subsidies to help bring down the cost of housing. At the same time, some residents also expressed a need for more higher-end housing that would attract middle-income families to neighborhoods with an overconcentration of subsidized housing or lower-valued housing.

RENTAL COSTS

Rental information collected by the U.S. Census Bureau shows that median gross rents from 2005-2009 for Springfield was \$714, which was comparable to compared Hampden County (\$716), but much lower than and Hampshire (\$847) County. Rents in Springfield may be lower than in other areas of the region, but they are still unaffordable to a significant percentage of city residents who face a gap between what they can afford to pay for housing and actual housing costs. Real estate and housing experts interviewed during the process to update this plan believe that rent in Springfield is high. The high rate of Section 8 utilization within the City may artificially inflate City average rents by setting them at a regional fair market rent which is higher than rents the City would otherwise bear. Individuals who attended one or more of the listening sessions identified high rents as a housing problem. Renter affordability problems in the city as well as within the region reflect both the stagnation in housing assistance programs and declining numbers of low-rent private apartments throughout the region. Extremely low- and very low-income renters who do not receive housing assistance have been especially hard hit, since the rent they can afford at 30% of income is far below market rents.¹⁵ Also, landlords typically expect first and last month's rent and a security deposit when the lease is signed, a sum that blocks many households from securing decent housing.

High rents outside of Springfield were also identified as a barrier to fair housing choice in the Regional Housing Plan. A household earning the City's median household income of \$41,476 would be able to afford many of the asking rents in Springfield and communities in the region considering the median gross rent in Hampshire and Hampden Counties. However, lower-income households, often the households most in need of rental housing, would have limited choices in finding a safe and affordable place to live. In addition, households with housing choice vouchers, such as Section 8 rental assistance vouchers, also have difficulty in finding affordable rental options outside of the region's major cities due to high rents and a one-size-fits-all Fair Market Rent region. High rents in many of the Hampshire County communities helps to exclude lower income households, which, in turn, perpetuates the concentration of lower-income households in particular communities of our region. Smaller Fair Market Rent areas would better reflect the strength or weaknesses of the regional housing market, particularly the strong market communities of Amherst and Northampton where asking rents are high.

Table 8: Fair Market Rents for the Springfield Metropolitan Statistical Area

Year	Efficiency	1 Bedroom	2 Bedrooms	3 Bedrooms	4 Bedrooms	2-BR % Change
2013	\$624	\$748	\$935	\$1,167	\$1,330	9.4%

Source: U.S. Department of Housing and Urban Development, August 2012

Note: Amounts represent the 100% rental payment standard.

¹⁵ 2010-2014 State of Massachusetts Consolidated Plan, Massachusetts Department of Housing and Community Development.

SUBSIDIZED OR INCOME-RESTRICTED AFFORDABLE RENTAL HOUSING

Subsidized or income-restricted rental housing is housing restricted to individuals and families with low to moderate incomes. Income-restricted housing receives some manner of financial assistance to bring down the cost of developing or renting the unit, usually in the form of a government subsidy, or results from zoning or mortgage interest rate relief to a housing developer in exchange for the income-restricted unit. There are three forms of income-restricted rental housing:

- **Public housing**—is owned by a public housing authority, established by state law to provide affordable housing for low-income people.
- **Private income-restricted housing**—is owned and operated by both for-profit and non-profits owners who receive development assistance and/or rent subsidies in exchange for renting to low- and moderate-income people.
- **Housing choice rental vouchers**—housing subsidy in the form of rental assistance is used by a tenant to find rental housing in the private market and is paid to a private landlord. The two most common housing choice voucher programs are the federal Section 8 housing choice voucher program and the Massachusetts Rental Voucher Program (MRVP).

PUBLIC HOUSING

The Springfield Housing Authority (SHA) is the largest public housing authority in the region. It manages over 2,300 federal and state-aided public housing units in 27 sites throughout the City. As of March 2013, a total of 990 families were on the Springfield Housing Authority's waiting list for federally-funded public housing. Approximately 90 percent of these families are classified as 'extremely low-income' earning less than 30 percent of the area median income. A relatively small portion of waitlist households are elderly households (13%) and slightly over half of families on the current waitlist have minor children. More than 35 percent of waitlist households contain a disabled family member. About 30 percent of the region's 8,000 public housing units are located in the City of Springfield. Further discussion on the SHA can be found on page 56.

PRIVATE INCOME RESTRICTED HOUSING

There are 9,986 privately-owned project-based income-restricted housing units in the City of Springfield.¹⁶ Most private income-restricted housing consists multifamily rental housing buildings or complexes. A major problem facing the region is the impending expiration of subsidies attached to affordable housing. However, this is typically not a problem for private income-restricted housing located in Springfield according to the City's housing director because the city's weak housing market creates a financial incentive for the management company to continue to collect public subsidies to

¹⁶ The number is derived from the Massachusetts Department of Housing and Community Development (DHCD) Subsidized Housing Inventory (SHI), minus the number of public housing units in the City. DHCD's SHI lists all income-restricted housing developments that are reserved for households with incomes at or below 80% of median under long-term legally binding agreements and are subject to affirmative marketing requirements. The SHI also includes group homes, which are residences licensed by or operated by the Department of Mental Health or the Department of Developmental Services for persons with disabilities or mental health issues who do not require continuous medical or nursing care.

keep the units affordable. In Springfield, owners usually recapitalize the project and continue to operate as affordable housing.

HOUSING CHOICE RENTAL VOUCHERS

The Springfield Housing Authority administers 2,500 housing choice rental vouchers, and HAP Housing (which operates regionally throughout Hampden, Hampshire, and Franklin Counties) administers more than 3,400 housing choice vouchers. Municipalities throughout the region also have individual housing authorities which administer Section 8 vouchers. In addition to Section 8 programs, there is also a similar state-funded program—the Massachusetts Rental Voucher Program (MRVP), which operates throughout the state, providing MRVP vouchers to local and regional housing authorities.

The Section 8 voucher program was enacted in 1974 to promote economic and racial integration and to shift public assistance to the private market. A 2012 PVPC analysis of where voucher holders resided, using data from all public housing authorities in the region that administer vouchers as well as HAP Housing, showed that out of the 9,900 voucher holders residing in the region, almost 60 percent lived in Springfield and another 15 percent lived in Holyoke (Figure 31). Three exurban or suburban communities—Longmeadow, Southwick, and Wilbraham—had zero voucher households despite having private market rental housing. This analysis shows voucher households have not been well integrated into regional housing market and instead remain in communities with high percentages of minority households and low-income households.

The 2013 Region Housing Plan recommends reinstating mobility counseling for housing choice rental voucher program holders as well as creating smaller fair market rent areas that more accurately reflect local market conditions. Mobility counseling would educate voucher holders on their housing rights, and assist them in understanding the benefits of moving to high-opportunity communities. Housing advocates in the region identified housing discrimination on the basis of receipt of public assistance and rental assistance as a prevalent example of housing discrimination in our region. Smaller Fair Market Rent areas would better reflect the strength or weaknesses of the regional housing market, particularly the strong market communities where asking rents are high.

Listening sessions with residents showed that residents had difficulty in finding a place to live with a Section 8 Housing Choice Voucher because some landlords claim that they don't accept Section 8's as a source of payment.

Listening sessions with service providers identified a need for mobility counseling for Section 8 or Massachusetts Rental Voucher Program (MRVP) housing voucher holders on their tenancy rights under state and federal law. This would empower voucher holders to fully maximizing their location options. Landlords who illegally refuse to accept housing choice vouchers or rent based on a person's language prevents is a prevalent form of discrimination in Springfield and the region. Funds are not currently available for mobility counseling in our region.

TOTAL HOUSEHOLDS WITH HOUSING SUBSIDIES

The Massachusetts Department of Housing and Community Development's Chapter 40B Subsidized Housing Inventory reports that 16.2% or 9,986 units of the City's total housing stock were subsidized in the form of public or private income-restricted housing. Springfield is one of only six municipalities in the Pioneer Valley who meet the state's goal of 10% housing affordability.¹⁷ Springfield alone contains 40 percent of the region's affordable housing stock and Holyoke contained 13 percent with over 3,300 units, together representing over 50 percent the region's income-restricted housing.

If households with a housing choice rental voucher (rental assistance voucher) are included in the analysis of the amount of households in Springfield with housing subsidies, then approximately 25 percent (15,749 households) of all households in the city have a housing subsidy. Also, this means that over 50% of the city's rental housing (28,513 units) is occupied by a household with a housing subsidy. This calculation does not include city residents with state-funded MRVP assistance or with assistance provided as part of permanent supportive housing programs for people who have experienced homelessness.

Listening sessions with residents identified the need for more public subsidies available to households to help bring down the cost of housing and make housing in the city affordable.

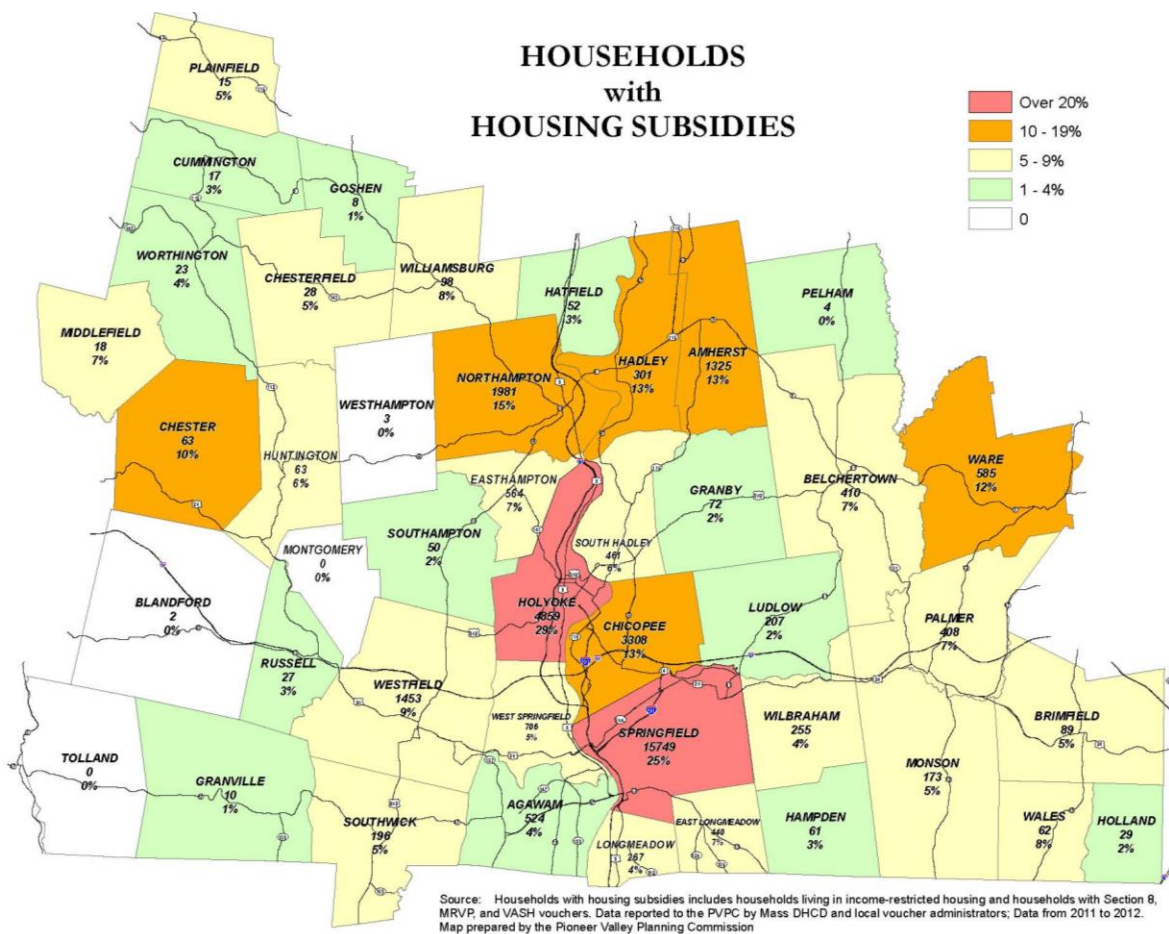
REGIONAL DISPARITIES—HOUSEHOLDS WITH HOUSING SUBSIDIES

The map below shows that households with housing subsidies are concentrated within the cities of Springfield and Holyoke. Overall, the region has a limited supply of income-restricted affordable housing—public and private—outside of our central cities. Housing production of new income-restricted units has not kept up with demand for these units nor with the loss of existing income-restricted units due to their term of affordability expiring. In addition, there are barriers preventing use of housing choice rental vouchers outside of the region's central cities, including rent limits under the market rents in non-urban communities, discrimination based on the subsidy or income source, linguistic profiling, and section 8 households' lack of familiarity with suburban areas. All of these factors serve to reduce housing choices and concentrate poverty in cities such as Springfield, Holyoke and Chicopee.

Listening sessions showed that many residents and staff at a various housing service agencies believe that past and existing city, state, and federal housing programs created and are continuing to perpetuate racial, ethnic and income segregation through their funding policies that sited subsidized housing projects in neighborhoods of poverty within the City. Mobility barriers for housing voucher holders were also identified as a concern.

¹⁷ Other municipalities include the central cities of Holyoke and Chicopee as well as Northampton, Hadley, and Amherst in Hampshire County.

Figure 15: Households with Housing Subsidies (with a rental voucher or living in an income-restricted unit), 2012



Source: Pioneer Valley Planning Commission 2012 analysis of DHCD’s Subsidized Housing Unit Inventory and of where voucher households resided using data from all public housing authorities in the region that administer vouchers as well as HAPHousing. Note: This map provides shows the total spatial distribution of households with housing subsidies in the region. This analysis considered a “household with a housing subsidy” to be a household with a rental voucher or a household living in an income-restricted unit that is counted on the state’s Subsidized Housing Inventory. The total of these two are divided by the total number of occupied housing units in the community to determine the percentage of households with housing subsidies in the community.

AGE OF HOUSING STOCK

The age of housing is used as an indicator of housing characteristics such potential rehabilitation and maintenance needs, lack of accessibility for people with disabilities, lead-based hazards, and energy inefficiencies. When compared to the United States as a whole, housing in Springfield is old. Almost 40 percent of Springfield’s housing (approximately 29,500 housing units) was built before 1940 compared to almost 10 percent at the national level.

Potential rehabilitation and maintenance needs: Well-maintained older homes are an important part of a community’s local history and help preserve historic character; however, older houses can be costly to maintain due to the increased need for maintenance and repairs to items such as water heaters, roofing, electrical systems and plumbing; and outdated and inefficient heating, cooling, and

insulation systems that result in higher associated utility costs. For these reasons, the cost of maintaining older housing represents a potential barrier to homeownership for low and moderate-income buyers.

Springfield's low housing values, due to its weak real estate market, mean that home values do not justify the cost of capital or maintenance improvements to older properties, for either homeowners or landlords. Where conditions deteriorate too far, housing is abandoned, leaving blight in the neighborhood. The low housing values give landlords a disincentive to investment in maintenance or improvements to properties, resulting in substandard or poor housing quality for tenants. The burdens of both neighborhood blight and substandard housing disproportionately impact people of color because of lower average household incomes.

The cost to rehabilitate and achieve code compliance in older houses is extremely high. It is often more expensive to rehabilitate an old home than it is to build new. The situation is exacerbated when a home remains vacant for a period of time and is stripped of pipes, wires and fixtures, adding to the cost of rehabilitation.

The housing market problem extends to multi-family apartment buildings, and these buildings are also caught in a cycle of declining condition, declining value, and the potential for foreclosure or abandonment.

In recent years, the lack of real estate value has led to an increase in suspicious fires in vacant buildings. The City believes that incidents of arson have increased.

Lack of accessibility for people with disabilities: Older homes were built to obsolete building code, creating difficulties for those with limited mobility. The age of housing can also create an impediment to fair housing because the cost of rehabilitation or modification can result in deferred maintenance or upgrades. These factors may limit the supply and availability of accessible and affordable housing for many, especially those with limited incomes and physical disabilities.

Lead-based hazards: Older homes still may contain outdated materials and unhealthy products such as lead paint, asbestos, and lead pipes. The U.S. Department of Housing and Urban Development estimates that 90% of structures built prior to 1940, 80% of structures built between 1941 and 1959, and 62% of structures built between 1960 and 1979 contain lead-based paint. When this formula is applied to the City of Springfield, it would indicate that approximately 73% of housing units in the city may have the presence of lead paint. A fortunate outcome of the high levels of housing that is income-restricted or leased to section 8 voucher-holders is that, because these programs require lead-safe housing, there has been progress in Springfield toward abatement of lead paint in rental housing. However, the presence of lead-based paint in the City is still a significant issue.

Housing advocates in our region have identified rental discrimination against families with young children due to the presence or potential presence of lead-based hazards as a leading form of housing discrimination. Massachusetts' lead paint law requires owners of properties built before 1978 to abate any property in which a child under the age of six resides in accordance with the state's lead paint requirements—unless that property has been inspected and shown to already be lead compliant. Owners of pre-1978 properties that are not lead-compliant will be held responsible if a child under six

is found to be poisoned while living in one of their properties. As a result, property owners throughout the region may seek to avoid renting to families and individuals with young children because of the presence – or the perceived presence – of lead paint in their units and the associated expense of lead abatement and disposal, even though such discrimination is prohibited by Massachusetts law. Decreased public funding for abatement and the escalating cost of abatement and disposal continue to hinder efforts at lead paint hazard reduction through rehabilitation.

The Massachusetts Department of Public Health's Childhood Lead Poisoning Prevention Program includes the City of Springfield as one of the nine high-risk communities in the Commonwealth for childhood lead poisoning. Between July 2007 and June 2012, 53 cases of lead poisoning were reported in the city, giving Springfield the 3rd highest incidence rate in the state for childhood lead poisoning.

Listening sessions with service providers identified a need for more outreach and education on fair housing laws to both tenants and landlords so that both groups understand their rights and responsibilities when it comes to lead paint abatement, reasonable accommodation, and substandard living conditions. Housing advocates indicated that there was a need for stronger enforcement of fair housing laws to deter violations. They also suggested that the City should place more resources on code enforcement to ensure residential properties are maintained as safe and decent housing environments.

ACCESSIBLE HOUSING

Providing accessible housing for people with physical disabilities, including mobility impairments, sight, hearing, environmental sensitivity and other disabilities allows people to live independently in the community. There is a great shortage of accessible housing units in the City as well our region compared to the number of residents with one or more disabilities. The 2008-2010 American Community Survey estimated that 16 percent of City residents age 18 to 64 (14,651 people) and over 40 percent of elderly residents in the City (6,928 people) had one or more disabilities. Of the residents with disabilities, approximately 8,200 residents age 18 to 64 and 4,800 elderly residents had ambulatory or "mobility" impairments. The web-based Massachusetts Accessible Housing Registry (MassAccess), which captures approximately 80 percent of all accessible rental units in the state, identified 153 units in the City that were accessible/adaptable units or units located on a ground floor or accessible by elevator in 2012. The number of people with physical disabilities within the City suggests the need for more concerted efforts to integrate accessible housing into planning for housing development.

Listening sessions with service providers identified a for more housing that was accessible for people with disabilities.

IV. PUBLIC & PRIVATE SECTOR CHARACTERISTICS

Despite the abundance of laws and regulations dating back to 1865, barriers to fair housing choice remain on the local, state and national levels. These impediments to fair housing choice are evident in both the public and private sectors. This section examines local characteristics to determine the extent to which they may contribute to lack of fair housing choice.

PUBLIC SECTOR

ZONING

A zoning bylaw or ordinance is public law that regulates the use of property for the health, safety and general welfare of the public. Zoning specifies the use allowed in particular areas of a municipality, the height, size, shape, and placement of structures, and the density of development. Municipal zoning has an important influence over fair access to housing choice, housing affordability and, more generally, housing development patterns. Zoning regulations substantially determine the location, size, and type of housing in a community, which, in turn, has a substantial influence on housing cost. Multi-family housing, two-family housing, and smaller single family homes on smaller lots tend to be more affordable to a wide range of households than larger single family homes on large lots.

Courts have held that government policies that have a disparate or segregative effect on minorities are in violation of the Fair Housing Act. Even absent direct evidence of intentional discrimination by local government, the provision of financial support for segregated housing despite knowledge of segregation may engender Fair Housing Act liability. Moreover, claims of ignorance of segregation patterns are likely to be unsuccessful, as government entities have duties to investigate how their funds are being used.¹⁸

The City of Springfield's Zoning Ordinance was most recently amended in May of 2013 and consisted of a substantial overhaul that did much to make regulatory and permitting processes for development clear, predictable, coordinated, and timely. Little to no change occurred in regards to allowable residential uses with the exception of a new "Industrial Mixed-use" zoning district that allows housing units in industrial-zoned building such as the historic mill-type buildings in Indian Orchard. This amendment will enable more housing variety in the city.

¹⁸ Massachusetts Department of Housing and Community Development, *Analysis of Impediments to Fair Housing Access and Action Steps to Mitigate Impediments* <http://www.mass.gov/hed/community/planning/fair-housing-and-civil-rights-information.html>

Overall, the City of Springfield's Zoning Ordinance promotes housing choice through residential zoning districts with smaller lot sizes, mixed use zoning districts, and allowances for greater density relative to surrounding communities. Besides the new "Industrial Mixed-use Zoning District," the City's ordinance includes seven residential districts and additional downtown districts that allow for residential uses. The City's residential districts offer a range of allowable lot sizes and structure types to maintain the City's denser urban neighborhoods and less dense areas on the city's outskirts. City-center neighborhoods allow for some of the smallest minimum lot sizes in the Pioneer Valley region. Additionally, the City's residential districts allow for cluster development by special permit, resulting in increased residential densities, a reduction in infrastructure construction and maintenance costs and to preserve open space.

Multifamily family housing refers to housing with three or more dwelling units in one building. Multifamily housing, such as apartments and condominiums, are typically the most affordable market-based housing available to rent or own and can provide important housing options for young adults, elderly, adults looking for low-maintenance housing, and low-to-moderate income households. The City of Springfield is one of 13 municipalities in the Pioneer Valley that allows multifamily housing by right in at least one residential district. The City allows for multifamily housing in two of its residential districts.

The Regional Housing Plan identified zoning as one of our region's primary impediments to fair housing choice. Over 40 percent of the municipalities in the region (19 communities) have regulations (zoning) that prohibit multi-family housing. Many of these same communities also have large minimum lot sizes that further limit housing choices. The City of Springfield is bordered by 8 municipalities, four of which have the most exclusive zoning in the entire Pioneer Valley region.

While such regulations are not in violation of housing laws and can be well intentioned, they potentially also have the effect of disproportionately reducing housing choices for the middle class, poor, minorities, families with children and other protected classes. Exclusionary zoning practices, which limit mobility, have helped to maintain the dominant spatial pattern of economic and racial segregation found in Pioneer Valley as well as in most metropolitan areas of the United States. It has also been identified as one of the causes of the state's affordable housing crisis because restrictive zoning in suburbs coupled with little vacant land in larger cities can limit housing supply relative to demand and therefore raise land and development costs.

GROUP HOMES

Courts have interpreted the Fair Housing Act to prohibit state and local governments from exercising their land use and zoning authority, as well as their authority to provide residential services and benefits, in a discriminatory fashion. As a result, local zoning laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities has been held to violate the Fair Housing Act. Persons with disabilities are entitled to request reasonable accommodations in rules, policies, practices, or services under the Fair Housing Act; as such, group homes for the disabled must be given the opportunity to seek a waiver to zoning restrictions. Government discrimination held to be unconstitutional has included enforcement of discriminatory restrictive covenants.

In Massachusetts, the siting of group homes is largely exempt from local zoning review due to the Dover Amendment, Massachusetts General Law Chapter 40A, Section 3, which prohibits municipalities from using zoning to exclude nonprofit educational organizations. Courts have interpreted ‘educational’ very broadly, to include any activities that support a person in independent living, so the Dover Amendment has removed virtually all group home uses from local zoning review.

BUILDING CODE

The Commonwealth of Massachusetts currently utilizes the 8th Edition of the Massachusetts Building Code, 780 CMR. This 8th Edition of the building code primarily uses the 2009 code books published by the International Code Council (ICC) with separate amendment packages published by Massachusetts. Further, the City Building Department adheres to 521 CMR, Architectural Access Board, for regulations related to building accessibility for persons with disabilities. The Building Department is responsible for enforcing accessibility requirements for the City’s public buildings as well as its multi-family housing units. Property owners interested in building either a temporary or permanent ramp for handicap accessibility are required to obtain a building permit from the city but require no additional permits or review. In the city, group home facilities are classified the same as single family homes and therefore can be sited in any zone throughout the city.

MUNICIPAL PROGRAMS

The City of Springfield manages a number of programs designed to improve the City’s housing stock, make it available to residents, and improve neighborhood stability and livability. These programs include regular sales of city-owned property, the multi-family rental rehabilitation program, the Neighborhood Stabilization Program, first time homebuyer education and financial assistance, emergency repair assistance for existing homeowners and the City’s homelessness initiative.

SALES OF CITY-OWNED PROPERTY

The City frequently acquires residential properties—both homes and vacant lots—through foreclosure for non-payment of taxes. By law, the City may dispose of these properties only auction or through a request for proposal (RFP) bidding process. The City’s priority for these properties is to transfer them to the ownership of responsible City residents to live in and maintain the homes, take over adjacent lots to make a bigger yard, or to build new housing on vacant lots in neighborhoods with low rates of homeownership.

MULTI-FAMILY RENTAL REHABILITATION PROGRAM

The City annually commits HOME Investments Partnership Program funds to the rehabilitation of existing multi-family rental housing. The City requires that recipients of these funds make a portion of the rehabilitated units handicap accessible.

NEIGHBORHOOD STABILIZATION PROGRAM

The City is in the final year of implementation of the Neighborhood Stabilization Program (NSP), which was funded through the Housing and Economic Recovery Act of 2008. The City received approximately \$5.2 million in NSP funds to be used within target neighborhoods. NSP funds provided assistance to acquire and redevelop foreclosed properties in areas experiencing abandonment and blight. The City targeted these funds in Old Hill, Six Corners, and portions of the South End and Forest

Park neighborhoods, and, at program end, will have created 27 new homeownership opportunities in these neighborhoods through housing rehabilitation and new construction on vacant residential lots. The funds were also used for removal of blight in the target neighborhoods.

HOMEBUYER & HOMEOWNER ASSISTANCE PROGRAMS

A critical barrier to purchasing a home for many potential homebuyers, especially those who are low- or moderate-income, is providing funds for a down payment. To increase access to homeownership for City residents, the City provides a down payment assistance program for first time homebuyers. Individuals looking to purchase a home in the City of Springfield who meet income and other eligibility requirements are eligible for \$3,000 in financial assistance from the City. In addition to eligibility requirements for the homebuyer and the home being purchased, all prospective buyers must complete a CHAPA (Citizens' Housing and Planning Association) or HUD certified homebuyer education class. These classes include modules on choosing a realtor and lender, the importance and process of a home inspection as well as the role of an attorney. Also included in the homebuyer education classes is a segment on housing discrimination, including information about the protected classes, common forms of discrimination and potential warning signs of discriminatory practices. The City provides homebuyer education classes in English and Spanish.

HOMEOWNER REPAIR

Lack of funds can prevent current homeowners—especially low-income homeowners—from making necessary repairs to maintain their homes. Older homes present a challenge due to the breadth of repairs needed to maintain the property at appropriate housing quality standards as well as the potential threat of and cost to remediate lead-based paint hazards. The City of Springfield, through the Office of Housing, maintains a Homeowner Emergency Repair Program. The program provides income and program eligible homeowners the means to make needed repairs to their homes, maintaining sustainable homeownership. In particular, the program benefits homeowners who may not qualify for programs offered through traditional lending sources.

HOMELESSNESS INITIATIVE

The City of Springfield has been a leading force in the regional effort to end family and individual homelessness in the City and greater Pioneer Valley Region. In January 2007 the City launched a 10-year plan to end homelessness, *Homes Within Reach*. As a result of this initiative, the City has experienced a 57% reduction in street homelessness in the City, as well as a 20% reduction overall in the number of homeless individuals without children in the City since 2007. A key piece of this initiative is recognition that a segment of the homeless population is chronically homeless, and requires permanent supportive housing. The City has created an innovative partnership with the Springfield Housing Authority, as well as nonprofit partners, to create hundreds of scattered-site permanent supportive units for chronically homeless individuals and families.

The City was pivotal in the creation of the Western Massachusetts Network to End Homelessness, a diverse network of municipalities, service providers, public and private sector professionals, educators, and members of the faith community from throughout Western Massachusetts committed to ending homelessness in the region.

HOUSING AND NEIGHBORHOOD IMPROVEMENT

The City has undertaken numerous projects to improve housing and neighborhood conditions for its residents. The City has been committed to neighborhood revitalization in the City's South End neighborhood since 2007. As part of this project, the City has improved roadways and streetscaping, cleared brownfields, expanded and renovated a neighborhood park, and has invested in the renovation of existing income-restricted housing including the ongoing \$75 million renovation of 22 buildings and over 300 units being completed by First Resource Company, which also recently completed a similar project in Metro Center recently called Worthington Commons. The City partnered with the Springfield Housing Authority to apply for and receive planning funds as part of the federal Choice Neighborhoods Initiative, in order to plan for replacement of the South End's Marble Street Apartments as part of a mixed-income housing development.

SPRINGFIELD REDEVELOPMENT AUTHORITY

The Springfield Redevelopment Authority is a corporate and political body established by the City of Springfield on June 24, 1960. Over the past fifty years, the Springfield Redevelopment Authority has been a key component in keeping the City of Springfield a vital place. Through broad development powers afforded by Section 46 of Chapter 121B, the Springfield Redevelopment Authority buys and sells property, acquires property through eminent domain, and constructs, finances and maintains properties throughout the City. Since its creation 50 years ago, the Springfield Redevelopment Authority has been involved in more than 35 Urban Renewal Plans throughout the City.¹⁹

REBUILD SPRINGFIELD

The Springfield Redevelopment Authority partnered with DevelopSpringfield, a nonprofit corporation that works to advance development and redevelopment projects to revitalize the city, for the Rebuild Springfield project. Rebuild Springfield was a collaborative planning project undertaken as a response to the June 2011 tornado that devastated the city. Rebuild Springfield was a project to build community vision for the future of Springfield's tornado-impacted neighborhoods as well as the city as a whole. A series of interactive public meetings were held throughout the city and throughout the planning process and focused on the broad areas of housing, infrastructure, green space and public facilities. More than 3000 City residents participated in creation of the plan. The final Rebuild Springfield Plan was released in February 2012 and provides action steps toward achieving the community vision for Springfield's future.

SPRINGFIELD HOUSING AUTHORITY

The Springfield Housing Authority (SHA) owns and operates nearly 2,400 units of conventional public housing units in 27 developments throughout the city, ranging from high-rise apartments to single family homes. This includes 13 developments for elderly and disabled residents, 14 developments for families and several scattered site locations for families, as well as for elderly or disabled residents.

The SHA also administers the Section 8 Housing Choice Voucher and Massachusetts Rental Voucher Programs (MRVP), which provide rental vouchers for nearly 3,000 units of housing in the private

¹⁹ Springfield Redevelopment Authority, www.springfield-ma.gov/planning/sra1.0.html

market. Section 8 and MRVP vouchers are not restricted to use within the City of Springfield. Section 8 vouchers can be used throughout the country and MRVP throughout the Commonwealth.

The SHA maintains separate waiting lists for their public housing units and for Section 8 and MRVP vouchers. The federal public housing waiting list had 990 households in March 2013. Currently, the SHA participates in the Section 8 Centralized Wait List, a pooling of many housing authorities in the region. There is a tremendous need for rental vouchers in the region and the waiting list is currently at between 5 and 10 years. The waiting list always remains open to new applicants.

Upon review of the Housing Authority's *Admissions and Continued Occupancy Policy* for its public housing units, there did not appear to be any discriminatory elements. The Policy contains sections specific to nondiscrimination and reasonable accommodations as well as accommodating applicants and residents who have no or limited ability to speak English. The Policy includes language on affirmative fair marketing and responsibilities under the Fair Housing Act. The Policy also includes a Limited English Proficiency Plan to provide Limited English Proficient applicants and tenants equal access to all programs.

VISITABILITY IN HOUSING

HUD HOME-funded programs are subject to federal laws governing accessibility for disabled persons. These standards are dictated by accessibility requirements that include details about who is protected by these standards and when these accessibility laws must be followed. HUD strongly encourages jurisdictions to incorporate visitability principles into their accessible design and construction projects funded with HOME funds in addition to those that are required.

According to HUD, housing that is visitable has a very basic level of accessibility that enables persons with disabilities to visit friends, relatives and neighbors in their homes within a community. Visitability can be achieved for little cost, with the use of two simple design standards; 1) providing a 32-inch clear opening in all interior and bathroom doorways and 2) providing at least one accessible means of egress/ingress for each unit.

At present, the City of Springfield encourages and welcomes HOME fund proposals that incorporate HUD's visitability standards into their design and construction features, but at this time the City does not make funding decisions based on whether visitability is a component of a proposed project.

PRIVATE SECTOR

MORTGAGE DENIALS BY RACE AND ETHNICITY

The Home Mortgage Disclosure Act (HMDA) requires every financial lending institution to provide the federal government with a range of information regarding their loan practices. Data collected includes categorizations of loan applications, originations and denials by race and ethnicity. This data was reviewed to determine if certain racial or ethnic groups were disproportionately denied a loan. Please see the Appendix for additional charts on denial rates for co-applicants and comparative charts for

Hampden County. In addition, the Appendix contains the full table that shows the reasons for denial by race and ethnicity by applicant and co-applicant.

An examination of Springfield and Hampden County HMDA data from 2009 to 2011 showed that when analyzing loan outcomes as a whole, Springfield residents had significantly higher loan denial rates than that of Hampden County. While 16% of loan applications were denied between 2009 and 2011 in the county, 22% were denied in the City of Springfield. When reviewing loan outcomes by applicant demographics, minority applicants had consistently higher loan denial rates than white applicants in the City of Springfield and in Hampden County. In both the city and the county, every racial group, as well as Hispanic and Latino borrowers were denied at a higher rate than white applicants.

Figures 16 and 17 below illustrate the mortgage denial rates in the City of Springfield by applicant’s race and ethnicity from 2009 to 2011. Figures 18 and 19 illustrate mortgage denial rates for all of Hampden County during this same time period. The dotted line shows the average denial rates for all applicants during this time period.

Figure 16: Springfield Denial Rates by Applicant Race

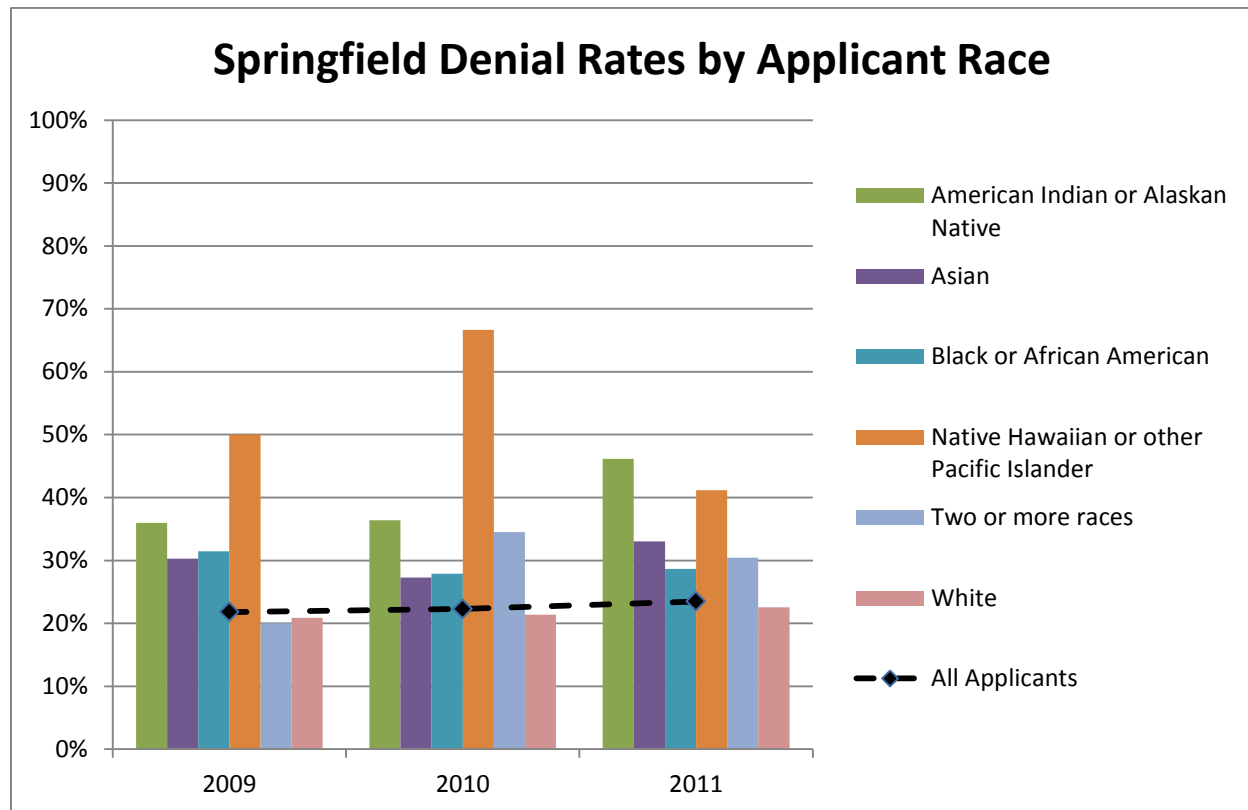


Figure 17: Springfield Denial Rates by Applicant Ethnicity

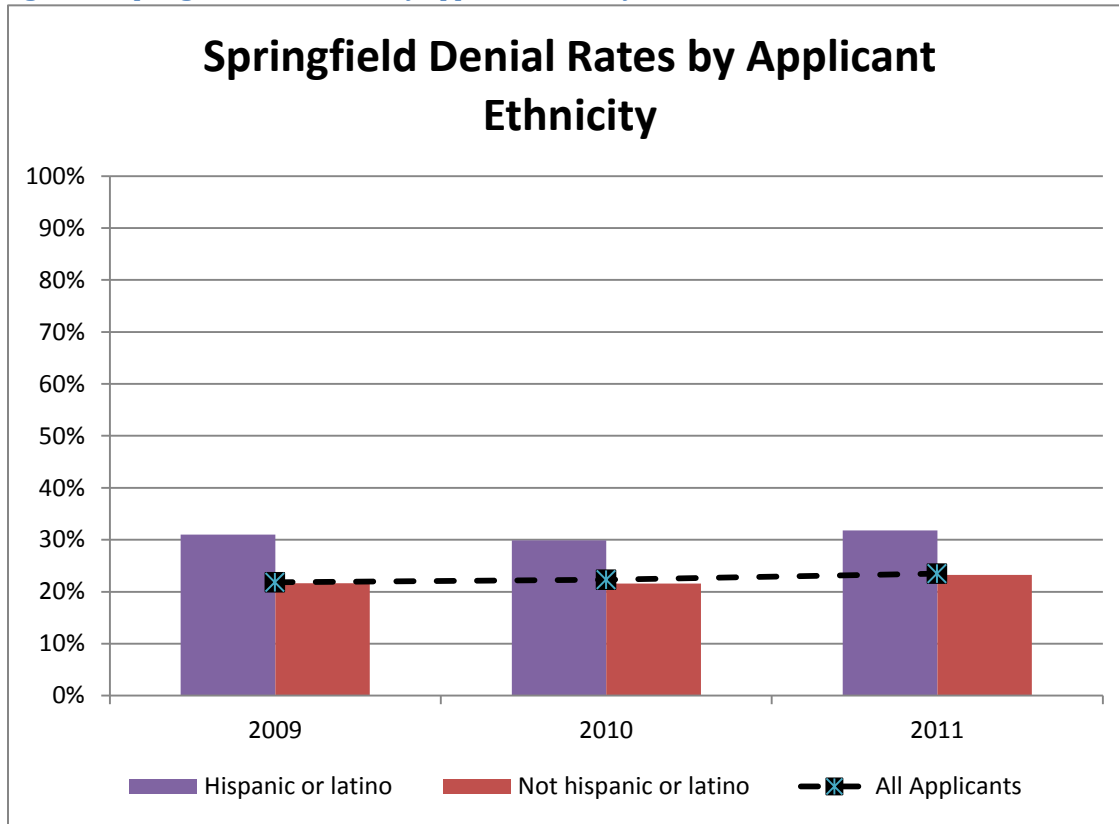


Figure 18: Hampden County Denial Rates by Applicant Race

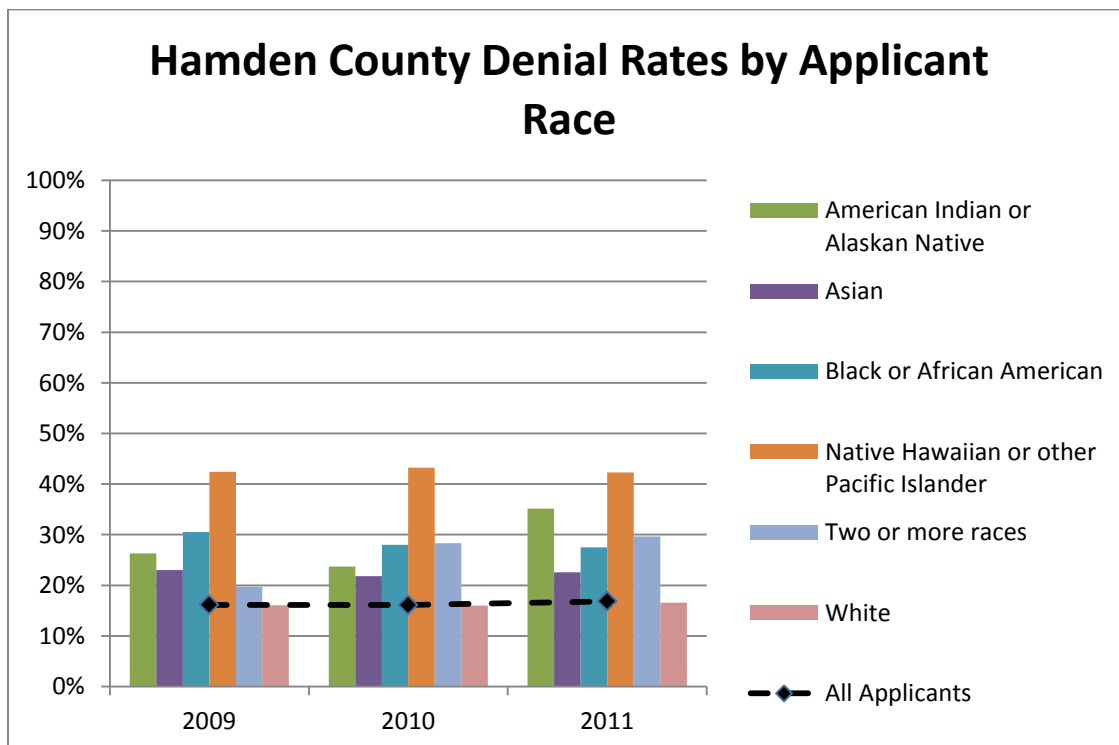
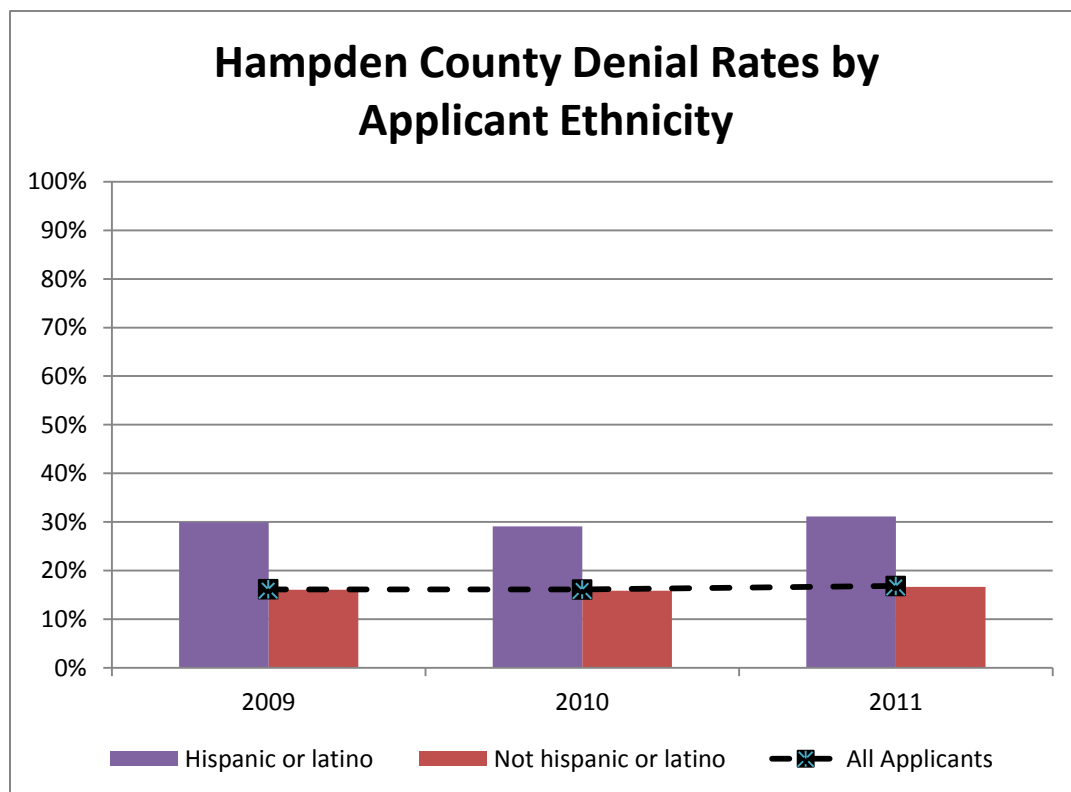


Figure 19: Hampden County Denial Rates by Applicant Ethnicity



The fair housing survey found that the most common limitation for residents seeking housing within the city of Springfield was the inability to obtain a mortgage to purchase a home (64.7% of respondents), and the inability to obtain a mortgage was cited as the most common limitation for residents seeking housing outside the city of Springfield (72.9% of respondents).

SUBPRIME AND PREDATORY LENDING

Subprime and predatory lending, also referred to as “reverse redlining,” greatly affected Springfield homeowners over the last twenty years. Predatory lending occurs when mortgage companies and brokers target financially vulnerable communities (the elderly, racial, ethnic and linguistic minorities) and use unfair practices to persuade these borrowers into paying more for a loan than other similarly situated borrowers. As a result of the predatory lender’s unfair and aggressive sales tactics--including steering borrowers, who were eligible for prime loans, into subprime loans--these financially vulnerable borrowers cannot afford to repay the loans. The borrowers then face the loss of their home and any equity they had acquired, as well as severe damage to their credit.

The housing characteristics section of this report shows that Springfield had a large number of foreclosures that occurred disproportionately in low income neighborhoods and those with a high population of minority households.

The last comprehensive study on this topic was completed by the Pioneer Valley Planning Commission in 2003. *Owning a Place to Call Home: An Analysis of Fair and Subprime Lending in the Springfield Metropolitan Area* revealed evidence of racial discrimination in the Pioneer Valley's housing and home lending markets.²⁰ The key findings of this study were:

- Many of Springfield's census tracts had high levels of subprime loan activity as compared to other census tracts in the region.
- Black and Hispanic borrowers were as much as three times as likely to be denied a home loan as white borrowers regardless of their income.
- Local banks have lower overall denial rates than non-local banks.
- Sub-prime lenders are primarily targeting their refinancing loan business at minority and low-income neighborhoods.
- A growing activity of sub-prime lenders within the region offering loans to risky borrowers who are then more likely to face foreclosure.

As a result of the study's findings, a small group of local banks and community-based organizations met for more than a year to discuss ways to improve mortgage lending outcomes in the Pioneer Valley in the hopes of creating more opportunities for sustainable homeownership. This discussion culminated in a 2005 Summit on Fair Lending and Financial Literacy during which the following activities were presented as methods for improving financial literacy and lending outcomes:

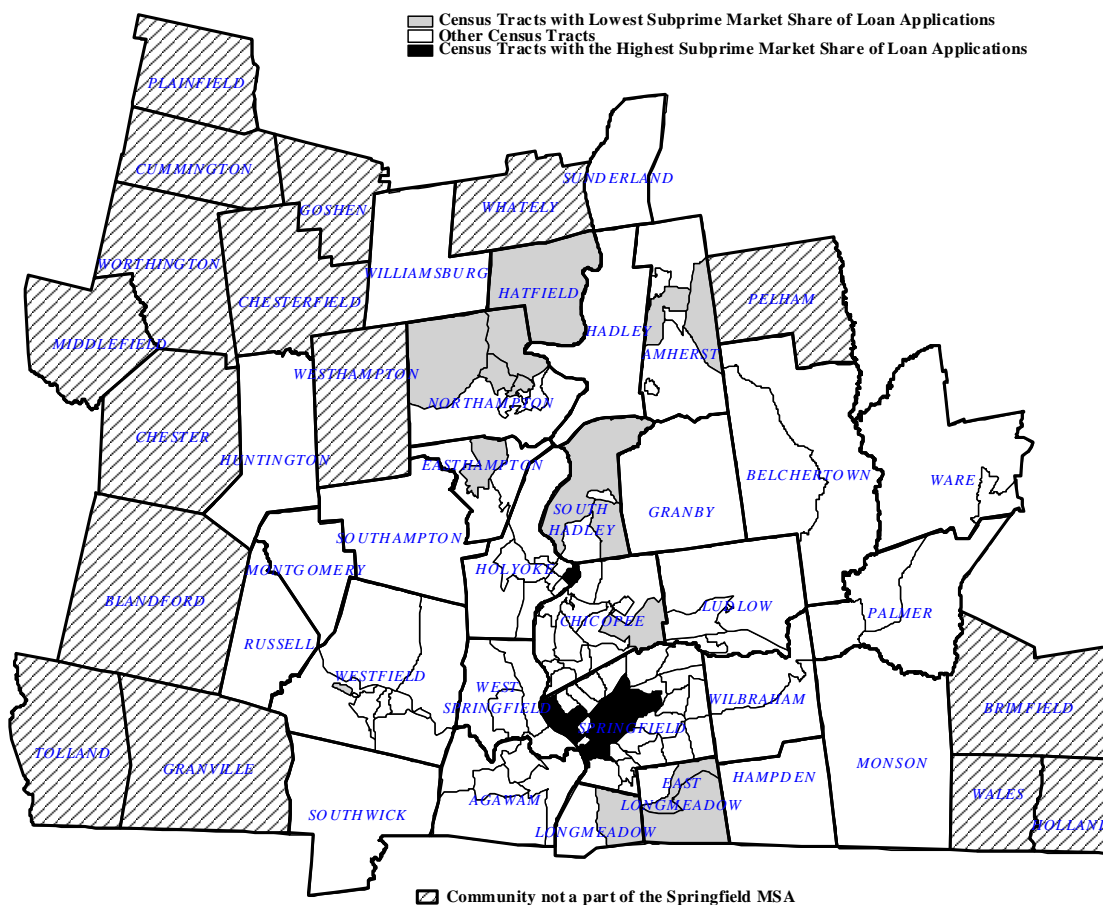
- Networking opportunities that pairs financial services professionals with community based organizations.
- Volunteer income tax assistance sites and banking services
- Financial literacy programs
- Educational opportunities for bankers and retailers
- Marketing to underserved consumers on the range of financial services available to them.

In Springfield, the highest rates of subprime lending took place in neighborhoods with low rates of homeownership, indicating that subprime lending fueled investment in rental property in the build-up to the housing market crash. As these properties declined in value, investors fell into foreclosure, leaving behind high levels of abandonment and blight in these neighborhoods.

²⁰ The PVPC reviewed Home Mortgage Disclosure Act (HMDA) data for this study.

Figure 20: Map from the 2003 *Fair and Subprime Lending in the Springfield Metropolitan Area Report* that shows census tracts with the highest levels of subprime lending activity

Map 6: Census Tracts with the Highest and Lowest Subprime Market Share of Loan Applications
2001



STEERING AND OTHER DISCRIMINATORY HOUSING PRACTICES

Housing advocates who weighed in on the development of the Regional Housing Plan noted the following discriminatory housing practices that are prevalent in the regional housing market, especially against persons of color. The most prevalent issues include:

- Active steering towards certain areas of a community and/or the region based on race/ethnicity, economic characteristics, and familial status.
- Rental discrimination against families with minor children.
- Rental discrimination against families with young children due to the presence or potential presence of lead-based hazards. This is usually a result of landlords not understanding or not being willing to comply with their obligations under Massachusetts laws to abate lead paint if a child under the age of 6 years old is occupying the unit and to not deny families with children under the age of 6 just because there is lead paint present in the unit. MFHC identifies this as a top area of concern based on their statistical data.

- Linguistic profiling in both the rental and homeownership markets, especially against persons of Latino origin. Linguistic profiling is the practice of using auditory clues—usually over the telephone—to identify race, ethnic origin, or other characteristics, and discriminating based on those characteristics.
- Discrimination against individuals with Limited English Proficiency (LEP) has been seen to be a problem of concern in landlords denying rentals to LEP individuals and in entities with federal funding failing to accommodate such individuals with written or oral translation services.
- Landlords who refuse to make reasonable accommodations (changes in rules or policies to allow an equal opportunity to use and enjoy housing) or reasonable modifications (structural changes) to allow individuals with disabilities an equal opportunity to use and enjoy housing. Landlords have an obligation to allow such reasonable accommodations or modifications upon tenant’s proper request.
- Landlords who refuse to accept housing subsidies as a source of rental payment is a main area of concern in our region.

This group of Pioneer Valley fair housing experts also felt that there was a need for more formal studies and reports to be conducted in the region on discriminatory housing practices, in order to draw public attention to the above noted issues as well as illuminate additional issues. One of the last significant regional analyses was conducted by the Pioneer Valley Planning Commission in 2003 on fair and sub-prime lending. These local experts acknowledged that academic programs at our region's colleges and universities could be better utilized to advance studies in regional fair housing issues.

Listening sessions with residents and service providers brought forth that all forms of housing discrimination listed in this section occur within the city and region.

V. EVALUATION OF JURISDICTION’S CURRENT FAIR HOUSING LEGAL STATUS

FAIR HOUSING COMPLAINTS OR COMPLIANCE REVIEWS

Discrimination, in addition to the structural issues such as economic insecurity and poverty, low levels of educational attainment, and single-parent households, can hinder mobility and residents' abilities to obtain stable housing situations. Housing discrimination is a significant and obvious factor that impacts housing choice. Discriminatory practices in renting, selling, lending or insuring housing are clear impediments to free housing choice among members of protected classes of people. While more overt discriminatory practices are more often reported, there are also more subtle forms of discrimination that can go undetected but create the same limitations to housing choice.

In the Commonwealth, The Massachusetts Commission Against Discrimination (MCAD) is charged with identifying and investigating acts of housing discrimination and enforcing the fair housing laws (*See the appendix for a full summary of all applicable fair housing laws*). MCAD ensures equality of opportunity by enforcing the Commonwealth’s anti-discrimination laws through the resolution of complaints of discrimination in the areas of employment, housing, public accommodations, services, credit and education. The MCAD reports all federal fair housing related complaints to the Department of Housing and Urban Development (HUD) as required by law. The following information includes housing discrimination complaints received by MCAD and reported to HUD regarding property in the City of Springfield from 2008 to present.

Table 9: Cases Filed 2008-2013

Basis	2008	2009	2010	2011	2012	2013	Total
Race	2	0	1	3	10	8	24
Color	1	1	0	0	0	0	2
National Origin	2	2	1	1	1	6	13
National Origin Hispanic	2	2	1	0	0	6	11
Religion	1	0	0	0	0	0	1
Sex	0	0	0	0	5	19	24
Disability	6	3	2	3	5	9	28
Familial Status	3	1	3	3	3	3	16
Total Filed	17	9	8	10	24	51	119

A total of 119 cases were filed against housing providers from 2008 to present. The most common Federal Fair Housing Act violation investigated by MCAD during this time period was discrimination against persons with disabilities which made up 28 of the 119 cases. Discrimination against persons with disabilities was closely followed in frequency by discrimination based on race and sex.

A total of 59 of the 119 cases filed have been completed. Completed cases include those that have been determined to have no cause, cases that have been conciliated or settled, cases where cause has been found by MCAD or that have been charged by HUD, as well as those that have been closed due to a complainant's failure to cooperate or the agency's inability to locate the client. The most common completion type identified during the time period was cases that have been conciliated or settled. MCAD succeeded in securing nearly \$44,000 in compensation for victims of illegal housing discrimination between 2008 and 2013. Findings of no cause were the second most frequent type of completion identified. Cases not completed remain open and ongoing. These cases include those that are still under investigation by MCAD or HUD as well as those that have been referred to the Massachusetts Attorney General's Office.

Table 10: Closure Type

Closure Type	Number
Administrative Closure	4
Cause (MCAD)	12
Charged (HUD)	1
Conciliated/Settled	23
No Cause	19
Total	59

FAIR HOUSING DISCRIMINATION SUIT FILED BY THE DEPARTMENT OF JUSTICE OR PRIVATE PLAINTIFFS

Staff at the Department of Housing and Urban Development confirmed that there were no cases involving Springfield housing providers that were filed by the Department of Justice or private plaintiffs between 2008 and April of 2013.

FAIR HOUSING COMPLAINTS RECEIVED BY THE MASSACHUSETTS FAIR HOUSING CENTER

The Massachusetts Fair Housing Center (MFHC) was established as the Housing Discrimination Project in 1989 and is the oldest fair housing center in Massachusetts. MFHC serves all of Central and Western Massachusetts with free legal services for individuals who have experienced housing discrimination on the basis of federal and/or state law. The Center investigates over 300 claims of illegal housing discrimination annually and provides legal assistance when discrimination is found. The Center also provides information and education programs to the public on the fair housing laws.

The following information includes all fair housing violation complaints received by MFHC from 2007-2002 regarding property in Springfield.

Table 11: Fair Housing Violation Complaints Received by MFHC from 2007-2012 for Properties in Springfield

	2007	2008	2009	2010	2011	2012	Total
Basis of Alleged Discrimination*							
Race/Color	3	5	3	4	1	0	16
Religion	0	1	0	0	0	0	1
Sex	0	1	0	2	0	0	3
Familial Status	1	8	11	6	0	2	28
National Origin	5	5	0	0	2	3	15
Disability	12	8	5	6	11	16	58
State Law Claim	4	3	4	5	4	19	39
Other	4	4	21	20	7	13	69
Total Complaints Received	21	30	39	41	21	47	199
*Note clients may indicate more than one basis for discriminatory act							
Issue Type							
	2007	2008	2009	2010	2011	2012	Total
Discrimination in Rental	15	18	22	20	16	40	131
Predatory Lending	5	9	17	15	0	7	53
Other**	1	3	0	6	5	0	15
**Other includes zoning, insurance, harassment, sales, foreclosure, landlord counseling or none specified							
Status of Case							
	2007	2008	2009	2010	2011	2012	Total
Open	1	2	1	1	2	8	15
Closed	20	28	38	40	19	39	184

The most common Federal Fair Housing Act violation alleged by MFHC clients is discrimination against persons with disabilities. Claims of illegal housing discrimination based on disability status made up nearly half of all claims made from 2007-2012. The second most common claim during this time was discrimination against families with children. While Massachusetts fair housing law protected categories were not included in this analysis, it is important to note that discrimination based on the receipt of public assistance was the top state law claim in every year reviewed.

The Center's primary complainants are clients who have experienced discriminatory practices in a rental housing situation. However, during the past six years, the Center has assisted 53 households with predatory lending complaints. It's also important to note that proportionally, few cases move forward to legal action. Many clients choose to not move forward with their cases, other times MFHC investigations are unable to substantiate discriminatory actions occurred or uncover an alternative and valid reason for a landlord's action. Cases that do move forward are often referred to MCAD for legal action or litigated by MFHC's legal staff.

VI. ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION

PROGRAMS AND ACTIVITIES

MASSACHUSETTS COMMISSION AGAINST DISCRIMINATION (MCAD)

The Massachusetts Commission Against Discrimination (MCAD) serves as the state's chief civil rights enforcement agency. The MCAD works to eliminate discrimination on a variety of bases and areas, and strives to advance the civil rights of the people of the Commonwealth through law enforcement, outreach and training. The MCAD has offices throughout at the state, including a Springfield office that serves the Pioneer Valley. MCAD provides fair housing education and advocacy, testing, enforcement and the ongoing monitoring of discriminatory practices that are key to eliminating bias in housing choice. The MCAD was established by the 1968 Civil Rights act and has served as one of the oldest civil rights enforcement agencies in the country.

MASSACHUSETTS FAIR HOUSING CENTER (MFHC)

The City of Springfield is also served by the Massachusetts Fair Housing Center located in the City of Holyoke. The Massachusetts Fair Housing Center (MFHC) was established as the Housing Discrimination Project in 1989 and is the oldest fair housing center in Massachusetts. MFHC provides free legal services for individuals who have experienced housing discrimination on the basis of federal and/or state law. When an individual reports suspected housing discrimination, MFHC will counsel him or her, investigate the complaint and, in appropriate cases, provide legal representation. MFHC's legal work helps to promote housing choice, preserve tenancies, avoid homelessness, create lead-safe housing for children and provide disabled tenants with equal access to housing. The Center investigates over 300 claims of illegal housing discrimination annually and provides legal assistance when discrimination is found

MFHC also engages in extensive educational activities. MFHC conducts outreach to individuals and families at high risk of discrimination to make them aware of the fair housing laws and illegal housing practices. MFHC's staff visit local social service agencies to present workshops on fair housing rights, teach first time homebuyers about their rights, counsel homeowners about their mortgages and publish and distribute informational materials in over 10 languages. MFHC also provides programs for landlords and property managers on the fair housing laws to prevent discrimination before it occurs.

MFHC receives funding from the U.S. Department of Housing and Urban Development, the cities of Springfield and Northampton, the Community Foundation of Western Massachusetts, and the United Way. MFHC also works with and receives funding from HAPHousing and the Massachusetts Commission Against Discrimination. The organization currently has a staff of five full time employees.

HAPHOUSING

Like the Massachusetts Fair Housing Center, HAPHousing receives funding from the Department of Housing and Urban Development to provide fair housing information and education programs. HAPHousing's services extend to the four counties of Western Massachusetts: Hampden, Hampshire, Franklin and Berkshire. HAPHousing provides education and information on fair housing through regular information sessions for local service agencies, religious organizations and those who assist the immigrant community. In addition to larger group sessions, HAPHousing staff meets with individuals one-on-one to provide fair housing counseling. HAPHousing does not provide enforcement services; the agency actively refers potential housing discrimination clients to the Massachusetts Fair Housing Center.

HAPHousing provides regular landlord trainings in the City of Springfield focusing on property maintenance, proper record keeping, tenant selection, fair housing, the state sanitary code and lead paint among other topics. In addition to providing fair housing information to roughly 500 participants who graduate from first time homebuyer classes annually, HAPHousing provides post-purchase workshops on maintaining homeownership. HAPHousing also runs a Homebuyers' Club which provides ongoing coaching, counseling, workshops and support regarding the homebuying process for those not yet ready to buy. Homebuyer's Club events and counseling are offered in English and Spanish and include information on improving credit, financial planning, and the advantages of homeownership. **HAPHousing** serves as the administrative agency for the Western Massachusetts Foreclosure Prevention Center, a collaborative partnership of agencies serving Berkshire, Franklin, Hampshire and Hampden counties. Through the Center, HAPHousing staff provides confidential guidance to help address the needs of current homeowners facing possible mortgage default and foreclosure.

In the last five years HAPHousing has assisted a total of 753 clients through the Foreclosure Prevention Center. 140 clients were assisted through loan modifications and mortgage refinancing, 129 received assistance with successful pre-foreclosure sales, 76 clients received counseling and were able to bring their mortgages current and 49 clients were referred to an outside agency for legal assistance due to a probable predatory lending or other illegal housing situation.

For the past six years, MCAD, MFHC, HAPHousing and the Western New England University School of Law have collaborated to produce an annual Fair Housing and Civil Rights Conference in the City of Springfield. This conference draws approximately 300 participants annually from throughout New England. This conference covers a wide variety of topics relating to fair housing and has become a valuable resource for service providers, landlords, legal professionals and residents in the area.

ASSESSMENT OF FAIR HOUSING CAPACITY

Representatives from the Massachusetts Fair Housing Center (MFHC), HAPHousing, and Massachusetts Commission Against Discrimination (MCAD) identified limited organizational capacity (staffing, funding) as the main barrier to more effective fair housing enforcement and education in the Pioneer Valley. They noted that they would need more financial resources to comprehensively undertake the work that needs to be done in the region. Other important barriers included:

- A lack of state and federal fair housing education and training requirements for landlords, tenants, banking and lending institutions, and general public;
- A lack of awareness of or interest in existing fair housing educational trainings; and
- Need for a stronger state fair housing strategy to respond to patterns, practices and policies that have had a broad, long-term impact statewide.

REVIEW OF PREVIOUS ANALYSIS OF IMPEDIMENTS – 2006

As part of the annual Consolidated Annual Performance and Evaluation Report (CAPER) the City of Springfield reports on impediments identified through prior AI processes and actions taken during the reporting period to address these impediments.

The text on the following pages is an excerpt from the City's most recent CAPER including an overview of the impediments found in the 2006 Analysis of Impediments and reflects their actions to affirmatively further fair housing.

The following impediments to fair housing in Springfield were identified in the 2006 AI:

- a. Lack of extensive amounts of undeveloped land;
- b. Imbalance between rental and homeownership in various neighborhoods;
- c. Presence of deteriorated privately-owned properties which are vacant or not actively managed;
- d. Evidence of predatory lending and redlining;
- e. Existing patterns of segregation;
- f. Language barriers and cultural differences; and
- g. The age of the housing stock and the prevalence of lead-based paint hazards.

ACTIONS TAKEN TO ADDRESS IMPEDIMENTS FY11-12

The City of Springfield has taken positive steps to affirmatively further fair housing and to address the impediments to fair housing identified in the AI. The following summary indicates the City's status toward these strategies. The first section lists the strategies contained in the 2006 AI, and the City's progress regarding these strategies. The second section identifies additional strategies that the City has undertaken to affirmatively further fair housing.

Section 1

- 1. Encourage infill/new construction of units suitable for homeownership on the scattered plots of land that remain available for development, particularly in neighborhoods where the homeownership rate is low.**

- *Old Hill Revitalization*

The Old Hill neighborhood, close to downtown, is made up of affordable single- and two-family homes, but many of the homes are distressed and the homeownership rate is only 32%. The

neighborhood has historically been Black (74% in 1980), but has become diverse over time: in 2010, the population was 9% Non-Hispanic White, 45% Black, less than 1% Asian, and 47% Hispanic.

Beginning in 2003, the City has partnered with the Old Hill Neighborhood Council, HAP Housing, Springfield Neighborhood Housing Services, Habitat for Humanity, and Springfield College in an effort to strategically revitalize the neighborhood. Together, the partners committed to developing 100 new or rehabilitated energy-efficient homes for first-time homebuyers.

In 2009, the City was awarded federal Neighborhood Stabilization Program (NSP) funds, and, as part of its planning for use of these funds, determined that the Old Hill neighborhood had been particularly hard-hit by the foreclosure crisis and had the most concentrated level of blight in the City. Based on this analysis, the City focused the majority of NSP funding in Old Hill, and accompanied the NSP-funded redevelopment with other focused city actions to address neighborhood conditions, including targeted code enforcement, increased demolition, and funding to Rebuilding Together to provide assistance with home repairs and improvements.

Through these combined efforts, the City and its partners have produced almost 50 new or substantially rehabilitated homes to date within the neighborhood, all of which have sold to owner-occupants, and have reduced the amount of blighted homes.

- *Development of homeownership opportunities in Neighborhood Revitalization Strategy Areas (NRSAs)*

The City has designated three areas as NRSAs: Old Hill and Six Corners; the South End; and the North End (Memorial Square and Brightwood). Each of these are neighborhoods with low rates of homeownership, low household incomes, and populations which are majority Black and/or Latino.

The City focuses all of its funding for homeownership development in these neighborhoods.

2. Implement balanced housing strategy: encourage homeownership throughout the City, with an emphasis on neighborhoods where homeownership rates are low and in neighborhoods that have little minority representation.

The City has undertaken the following strategies to increase homeownership throughout the City:

- *Provide downpayment assistance for first-time homebuyers*

The City provided homebuyer assistance—deferred 0% interest loans—in the amount of \$3000 to 82 income-eligible first-time homebuyers purchasing homes within the City in FY2011-2012. The City has found that the program is frequently a tool that enables people of color to purchase their first homes (in 2011-2012, 49% of assisted households were Hispanic and 29% were African-American). The City has structured its homebuyer assistance program to be used in any of the City's seventeen neighborhoods.

- *Market all City Neighborhoods through Buy Springfield Now*

The City uses general fund revenue to support the Buy Springfield Now marketing program, which provides service, lending and retail incentives to households purchasing a home in the City. The campaign also conducts coordinated open houses, where potential buyers can qualify for prizes by viewing city homes available for sale. The Buy Springfield Now events have included homes built as part of the Old Hill revitalization.

- *Affirmative marketing*

All housing units developed or rehabilitated with HOME or NSP assistance are required to be marketed to ‘those persons least likely to apply.’ HOME and NSP developers are required to provide copies of their affirmative marketing plans to the City.

The City has undertaken the following strategies to encourage homeownership in neighborhoods with low rates of homeownership:

- *Enhanced Downpayment Assistance.*

The City worked with the Massachusetts Housing Investment Corporation (MHIC), Springfield Neighborhood Housing Services, HAP Housing and the North End Housing Initiative to use Neighborhood Stabilization Program and other funds to provide larger amounts of downpayment assistance to households purchasing in the Old Hill, Six Corners, and the South End neighborhoods, each of which is a neighborhood with very low homeownership rates. The larger amounts of downpayment assistance available in these neighborhoods are for the purpose of encouraging homebuyers who might otherwise be reluctant to purchase a home in a neighborhood where the majority of homes are renter-occupied.

- *Historic home rehabilitation*

Within the City’s core neighborhoods, which are predominantly renter-occupied, there are many historic homes which are in need of repair. When these homes become City-owned due to foreclosure for non-payment of taxes, the City makes the properties available, on a competitive basis, for homeownership. Through a request for proposals process (RFP), the City seeks bids for the particular historic property, along with CDBG funds that may be used for property rehabilitation.

Homeownership in neighborhoods with little minority representation:

Changing demographics over the last several decades have shifted populations in Springfield neighborhoods so that there are no longer neighborhoods that are exclusively white and, in fact, most neighborhoods are made up of a diverse population. There are only three neighborhoods in the City where whites make up more than 60% of the population (Indian Orchard 66%, Sixteen

Acres 71%, and East Forest Park 84%)²¹. Twenty-eight percent of first-time homebuyers who received assistance from the City in FY 2011-2012 purchased homes in these neighborhoods; 12% of the purchases were in East Forest Park.

3. Pursue strategies to address abandoned properties through demolition and/or redevelopment.

The City has several inter-related programs to address abandoned and/or distressed properties. The activities undertaken in these programs are concentrated in neighborhoods that are predominantly rental and have higher-than-average populations of Latinos and African-Americans.

- *Code Enforcement and legal action*

The City's Housing and Building Department undertake both responsive and proactive code enforcement. Through these efforts, these departments condemn units and building that are not fit for human habitation, and cite properties for blight. Condemnations and blight cases are referred to the City's Law Department, which initiates actions against property owners seeking court orders for owners to repair or demolish distressed and blighted buildings.

In June 2011, Springfield experienced a tornado which damaged hundreds of housing units in the City. The City was concerned about absentee landlords taking insurance funds and abandoning properties without making repairs. In order to prevent this, the City initiated Court actions, seeking court orders to require property owners to make repairs or undertake demolition.

- *Receivership*

Where there is no responsible owner to take action regarding a vacant or abandoned property but the property is one where the property is not in distressed condition, the City's Law Department seeks court appointment of a receiver to make necessary repairs to the property. The state's receivership law allows the receiver to repair and lien the property, and the lien takes priority over all other liens, allowing foreclosure of the lien to convey ownership of the property. In FY 11-12, the City filed motions for receivers in 71 cases, and the court appointed receivers in 38 cases. In the majority of the cases where a motion for receiver was filed but a receiver was not appointed, the outcome was that the filing of the motion prompted the owner to take responsibility for the property and make repairs.

In some cases, receivers have been unwilling to take on receivership of vacant properties due to a lack of capital to make needed repairs. In order to address this barrier, the City worked with the Springfield Redevelopment Authority to set up a revolving loan fund for receivers; the loan fund has

²¹ Note: The analysis that was done at the time of the CAPER looked at the percentage of whites in a neighborhood, but there is overlap between whites and Hispanics because white is a race and Hispanic is an ethnicity. Throughout this Analysis of Impediments to Fair Housing, data reflects numbers of non-Hispanic whites, in order to eliminate the double-counting of Hispanic whites and to more clearly describe the demographics of the area.

been capitalized with City of Springfield CDBG funds. The SRA loaned funds to two receivers in FY11-12.

- *Acquisition and disposition*

When properties are abandoned, owners stop paying property taxes. The City places tax liens on the properties, and then forecloses these liens, becoming owner of the property. The City uses an auction process to return these properties to active and responsible use. The City requires that owners purchasing at auction use the homes for owner-occupancy.

- *Demolition Program*

The City undertakes demolition of distressed properties that are beyond repair or create dangerous conditions in neighborhoods. The City's demolition program is funded annually with CDBG funds, and the City also allocates bond funding for this purpose. In FY2011-2012, the City demolished 15 structures, a number that was lower than average because a great deal of emergency demolition was carried out one month prior to the beginning of the fiscal year following a tornado, and the beginning of the FY2011-2012 year was dedicated to tornado clean-up. In the previous fiscal year, the City demolished 55 structures.

4. Work with local lending institutions to do outreach to minority communities to address issues of predatory lending and repair scams.

The City has found that tightening credit has made it very difficult for many homeowners to obtain loans from local institutions. As a result, the City has focused on other strategies to address issues of predatory lending and repair scams.

- *Support for Home Repair and Rehabilitation*

The City has initiated and expanded City-operated programs which provide assistance to homeowners in need of repairs. The City operates an Emergency Homeowner Repair Program, funded with CDBG funds, which is marketed primarily in the Old Hill, Six Corners, South End, Memorial Square and Brightwood neighborhoods.

Similarly, the City has worked with other entities to provide funds for home repair and rehabilitation. In connection with the State Street Revitalization initiative, MassMutual has made funds available for homeowner rehabilitation. The City applied successfully to the Massachusetts' Attorney General's Office on behalf of Springfield Neighborhood Housing Services for funds for homeowner rehabilitation in the Old Hill neighborhood.

- *Education*

Following the June 2011 tornado, the City created a manual for property owners impacted by the tornado that compiled information about working with FEMA, various grant and low-cost loan

funding sources available for repair and rebuilding post-tornado, as well as cautions and guidance for working with home rebuilding contractors. The manual was widely distributed to impacted homeowners, especially those in the low-income neighborhoods of Six Corners, Old Hill and the South End.

- *Foreclosure Prevention*

The City is a member of the Western Massachusetts Foreclosure Prevention Center, operated in Springfield by HAP Housing, and has coordinated with HAP on marketing services (including legal services) to assist homeowners facing foreclosure.

- *Additional Activity in Response to High Rates of Subprime Lending*

Research undertaken by the Pioneer Valley Planning Commission (PVPC) identified core urban neighborhoods as having high rates of subprime lending. These are neighborhoods with low rates of homeownership, but many 1- and 2-family homes. Through analysis of foreclosure data, code enforcement, legal action, and tax-taking cases, the City identified these neighborhoods as having high rates of abandonment and blight.

By looking at actual property transactions, we identified patterns of irresponsible property transactions, including property flipping and artificial inflation of property values through multiple transfers among associated individuals and businesses. The end result was the sale of a home for inflated property value, financed by subprime loans, to out-of-town investors. The actors involved with these properties were also associated with several properties that burned under circumstances that indicated arson.

The City compiled this data and provided it to the U.S. Attorney for investigation into these practices.

5. Work with surrounding communities to identify and overcome barriers to the regional racial imbalance.

Springfield is a partner in the Knowledge Corridor Consortium, a bi-state initiative that has received HUD Sustainable Communities planning funds. The City is actively engaged with the Pioneer Valley Planning Commission's work to create a regional housing plan and in undertaking a regional Fair Housing and Equity Assessment. The plan and assessment are expected to be completed in 2013.

In 2013, PVPC will update Springfield's AI and will incorporate data and strategies related to the regional racial imbalance.

6. Continue to offer services, particularly first-time homebuyer education and counseling, fair housing education and credit counseling, in languages other than English (primarily Spanish) and target these programs to minorities.

The City provides homebuyer education classes in English and Spanish. The class includes components addressing fair housing component and predatory lending.

The City's homeownership development partner, HAP Housing, runs an ongoing Homebuyers' Club, which provides ongoing coaching, counseling, workshops and support about the homebuying process, improving credit, financial planning, and the advantages of homeownership to first-time homebuyers. Homebuyer's Club events and counseling are offered in English and Spanish. Springfield Partners for Community Action provides financial literacy workshops, credit counseling, housing counseling, and Individual Development Accounts (IDAs), which can assist people in saving for homeownership.

Springfield is a funding partner for Springfield Neighborhood Housing Services, a community-based housing development organization which provides homebuyer counseling, foreclosure counseling, and financial fitness workshops, targeted to the City's historically African-American neighborhoods.

The City provides funding to the Massachusetts Fair Housing Center, which accepts housing discrimination complaints and provides free legal assistance to people who have been victims of discrimination.

Springfield's Office of Housing provides fair housing materials to the public, in English and Spanish, and displays fair housing posters to inform residents of their fair housing rights.

7. Provide financing and other incentives for property owners to upgrade housing, address lead-based paint hazards and make reasonable accommodations for residents with disabilities.

City programs that provide funding for these purposes are described in the answer to number 4, above, under *Support for Home Repair and Rehabilitation*. In addition, the state of Massachusetts funds home rehabilitation, removal or control of lead-based paint hazards, and home modifications for persons with disabilities. These programs are operated in Springfield by HAP Housing. The City's Office of Housing assists in marketing and refers city residents to these programs.

In 2011 and 2012, the City partnered with the Massachusetts Department of Housing and Community Development to apply for HUD funds to be used to mitigate lead paint hazards. These applications were unsuccessful.

8. Work with City Departments and the SHA to ensure fair housing practices are in place.

The City's Office of Housing requires all subrecipients to comply with fair housing obligations, and monitors compliance as part of regular grant monitoring.

The Springfield Housing Authority's Admissions and Continued Occupancy Policy (ACOP) includes SHA's commitment to fair housing and nondiscrimination, and contains policies to carry out these commitments, including policies regarding Limited English Proficiency and reasonable accommodations for persons with disabilities.

9. Implement a coordinated system for monitoring and investigating fair housing complaints submitted to HUD, MCAD and MFHC.

The City has not yet implemented this strategy.

Section 2

Bringing Opportunity to Households in Lower-Income Neighborhoods

- Choice Neighborhoods Planning Grant

The City of Springfield, in partnership with the Springfield Housing Authority (SHA), applied for and was granted a Choice Neighborhoods Planning Grant for the City's South End neighborhood in January 2012. Funds from this grant are enabling the City and SHA to plan for demolition of distressed public housing in one of the City's most low-income neighborhoods, the South End, and replacement of these units in a mixed-income environment. The planning process includes work to bring substantial neighborhood and supportive services improvements to the South End and its residents.

- Section 3 Coordination and Implementation Grant

The City of Springfield applied for and was awarded a competitive Section 3 Coordination and Implementation Grant. The City partnered on this grant with the Springfield Housing Authority and the Regional Employment Board of Hampden County. This grant provides funds to support a staff person whose role is to improve rates of local low-income persons who are employed on projects funded with HUD assistance.

- North End C3 Initiative and Byrne Grant

The City has been proactive in addressing crime in urban core neighborhoods. Over the last several years, the Springfield Police Department has partnered with the Massachusetts State Police and community organizations and residents in implementing the Counter Criminal Continuum (C3) policing model in the North End neighborhoods of Brightwood and Memorial Square. The C3 model is a type of community policing that has been enhanced by lessons learned from Department of Defense strategies used in Iraq and Afghanistan, and has had a measurable impact in reducing drug and gang-related crime in the North End since 2010.

In 2012, the City applied for funding from the Department of Justice to expand this initiative to the South End neighborhood. Although this initial application was unsuccessful, the City will apply

again in 2013, and continues to look for opportunities to expand this successful intervention into other core City neighborhoods.

Response to Homelessness and Housing for Special Needs Populations

Since 2007, Springfield has been a leader in converting its homeless assistance program into a Housing First model, in which the highest priority is given to ensuring that people experiencing a housing crisis are offered the housing and services needed to enable them to obtain and maintain stable housing. A core of this strategy is creation of permanent supportive housing units, which provide people with disabilities housing and supportive services in a single package. Since 2007, the City and its funding partners have created over 250 units of permanent supportive housing for chronically homeless people, all of whom have disabilities which have previously interfered with the ability to maintain stable housing. The vast majority of these units have been created as scattered site units.

The City has had a leadership role in encouraging this housing-focused response to homelessness throughout the region. The City was a founding member of the Western Massachusetts network to End Homelessness, which educates and advocates for a housing first response to homelessness in all cities and towns in western Massachusetts.

VII. CONCLUSIONS AND RECOMMENDATIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE

The following impediments to fair housing choice in the City of Springfield were identified through this Analysis of Impediments:

Discrimination or Barriers that Limit Successful Housing Search and Access

- Discriminatory attitudes of some individual landlords, property owners, and others in the fields of housing search, rental, sales and financing
- Cultural racism, at the societal and individual level
- Lack of awareness of Fair Housing laws
- High number of rental units owned and managed by small unsophisticated landlords
- Linguistic profiling (a negative response to a housing seeker via phone because of an accent or manner of speaking)
- Discrimination in advertising (Craigslist has been singled out for this barrier by survey respondents)
- Refusal to take Section 8 housing vouchers by some landlords
- Limited number of housing professionals (especially Realtors and mortgage lenders) who speak Spanish
- Lack of information on housing options and the housing market in Spanish
- Presence of lead paint in older housing
- Lack of accessible units
- Lack of access to credit on equal terms, including lenders that target minority neighborhoods for loans with less-favorable terms (predatory lending)
- Factors that contribute to a lack of education and employment opportunities for people of color, thereby limiting their incomes and ability to access the private housing market
- Disparities in purchasing power, and, particularly, a large population with very low incomes

Factors that Support Continuation of Exclusive Communities which cannot be accessed by Persons in Protected Classes

- Lack of multi-family or rental housing in many of the communities outside of Springfield as a result of municipal zoning that limits or prohibits its construction
- Lack of low-income housing, particularly for families, in most communities outside Springfield
- Regional HUD Fair market rents (FMR) which prevent most Section 8 Housing voucher holders from renting units in high opportunity communities where rents exceed the regional FMR
- Lack of an effective regional public transportation system
- Lack of a regional tax base, which enables higher-opportunity communities to be better able to provide high-quality municipal services, while low-income/low-opportunity communities are starved for resources

Factors that Contribute to Concentration of Affordable or Poor-Quality Housing in Low-Opportunity Neighborhoods

- Cultural and institutional racism
- A weak housing market in the City, where the costs of construction exceed the sales or rental income value of residential properties
- A market that attracts low-quality investor-owners who fail to maintain properties
- Poor condition of rental and for-sale housing in distressed neighborhoods
- Presence of deteriorated properties that are vacant or not actively managed
- State and federal policies regarding affordable housing funding
- The placement of the vast majority of the region’s public and subsidized housing in a limited area in the region (in Springfield and Holyoke)
- Lack of sufficient resources for the City to adequately address neighborhood blight, public safety, and quality K-12 education

Factors that Contribute to Lack of Employment Opportunity for City Residents

- Discriminatory attitudes of persons in position to hire
- Limited public transit routes and schedules
- Low educational outcomes for City residents

ACTIONS TO ADDRESS IMPEDIMENTS

The City of Springfield proposes the following actions to address the impediments to fair housing that were identified through this AI:

People-Based Strategies

These are strategies that help individuals and households overcome discrimination in housing search and have equal access to housing.

- Educate the public about fair housing rights and responsibilities
 - Put information about fair housing and fair lending on the City website and on the website for the Buy Springfield Now campaign
 - Provide training and educational materials about fair housing to housing search workers at agencies throughout the City
- Support vigorous enforcement of Fair Housing Laws
 - Continue funding support for the Massachusetts Fair Housing Center and partnership with the Massachusetts Commission Against Discrimination and HAPHousing to enable:
 - Ongoing outreach to local landlord associations
 - Education of renters and homebuyers
 - Monitoring and reporting fair housing violations
 - Testing, especially for linguistic profiling, Section 8 discrimination, and discrimination against families with children

- Technical assistance in the form of trainings and information on accessibility laws and best practices to landlords and housing providers.
 - Review internal data to determine if the City may be able to support legal claims regarding lending activities.
- Assist Springfield households to become homeowners
 - Provide downpayment assistance to first-time homebuyers
 - Coordinate with HAP Housing’s Homebuyer Club and with Springfield Partners for Community Action’s Individual Development Account (IDA) program
 - Coordinate with lenders regarding assistance to first time homebuyers with mortgage assistance and below market mortgage products.
 - Coordinate with the Springfield Housing Authority to expand the Section 8 homeownership program
- Assist households with Limited English Proficiency (LEP) to access housing
 - Ensure that housing search services are available in Spanish, and with translation available for other languages
 - Provide homebuyer education in Spanish
 - Access to Realtors and financing in Spanish
 - Make fair housing information and services available in Spanish
 - Review the City’s Limited English Proficiency (LEP) policy, and revise as indicated
- Improve access to housing for persons with disabilities
 - Review and revise City guidelines for investment of housing funds, to ensure that these guidelines prioritize accessibility and viability.
- Improve access to housing for families with children
 - Apply for competitive federal funding to address lead-based paint hazards in housing throughout the City

Place-Based Strategies

These are strategies that assist neighborhoods and communities to achieve integrated housing and equal access to opportunity for all.

Strategies for All City Neighborhoods

- Implement the 2011 Foreclosure Ordinances (delayed due to legal challenge)
- Promote the “Buy Springfield Now” program, which is a collaborative effort comprised of public sector and private sector organizations to attract middle income residents to homeownership in the city
- Review and revise City guidelines for investment of HOME funds, to ensure that these funds are prioritized to support neighborhood revitalization and needed rehabilitation of older housing
- Continue existing strategies to improve Springfield Public Schools city-wide

Strategies for Lowest Opportunity Neighborhoods

- Promote market-rate housing
- Continue to use Neighborhood Revitalization Strategy Area designations for the South End, Six Corners, Old Hill, Brightwood and Memorial Square neighborhoods, and to provide targeted investment of federal dollars in those neighborhoods
- Use federal funds, including HOME and CDBG-DR, to create new homeownership units in NRSAs
- Provide funds for homeowner repairs and rehabilitation
- Explore creation of a housing rehabilitation program targeted to landlords
- Continue existing historic preservation program, and explore creation of a historic preservation revolving fund
- Seek funds under the federal Choice, Promise and Byrne grant programs to create or expand place-based housing, education and public safety strategies
- Support early literacy strategies targeted toward ensuring that children can read by grade 3

Linkage Strategies

These are strategies aimed at assisting people in protected classes to access opportunity.

- Provide minority residents with assistance in accessing housing in high-opportunity communities
 - Advocate that HUD partner with the City to create a Moving to Opportunity demonstration program in which Section 8 voucher recipients are provided with mobility counseling and HUD creates small-market Fair Market Rent values, which would enable voucher-holders to afford rents in communities outside of Springfield and Holyoke
 - Coordinate with the Springfield Housing Authority and HAPHousing to provide Section 8 mobility counseling
- Take steps to improve access to employment for City residents, especially in low-income neighborhoods
 - Use a Section 3 coordinator to improve Section 3 hiring outcomes
 - Vigorously enforce Section 3 requirements for HUD-funded projects
- Work with the Springfield Housing Authority to explore designation as a Moving to Work Housing Authority, which would enable SHA to have more flexibility in its funding, in order to assist residents to improve education and income
- Use City role in governance of Pioneer Valley Transit Authority to improve public transit for City residents

Strategies to Increase Understanding

- With the Pioneer Valley Planning Commission, facilitate the formation of and participate in a fair housing coalition of key stakeholders to help shape a regional conversation on fair housing
- Play a leading role on the Regional Housing Plan Committee
- Collaborate with Massachusetts Commission Against Discrimination, Massachusetts Fair Housing Center and HAPHousing to produce annual regional fair housing conference, and emphasize the issue of regional access to opportunity at these conferences

- Facilitate participation in anti-racism training by City staff and staff at agencies funded by the City
- Engage in collaborative discussions to address the issue that the few accessible units in the region often get rented to people who do not need the accessibility features
- Advocate for changes to state revenue sharing practices which provide inequitable financial support for cities

SIGNATURE PAGE – CHIEF ELECTED OFFICIAL

Domenic J. Sarno, Mayor
City of Springfield, Massachusetts

APPENDIX

- FEDERAL AND MASSACHUSETTS FAIR HOUSING SUMMARY
- CITY OF SPRINGFIELD FAIR HOUSING SURVEY RESULTS
- LISTENING SESSIONS SUMMARIES
- SPRINGFIELD NEIGHBORHOODS BY RACE AND ETHNICITY
- LENDING ANALYSIS DATA

FEDERAL & MASSACHUSETTS FAIR HOUSING LAWS SUMMARY

Federal Fair Housing Act

In 1968 the United States Congress passed Title VIII of the Civil Rights Act, prohibiting discriminatory housing practices based on personal characteristics including race, color, national origin, religion and sex. In 1988, Congress amended Title VIII to include families with children and people with mental or physical disabilities to the list of categories, also known as protected classes.

The Fair Housing Act applies to four broad types of housing;

- Multi-family dwellings with greater than four units, including boarding, rooming, and lodging houses;
- Multi-family dwellings with four or fewer units if the owner does not live in one of the units;
- Single-family privately owned homes when a real estate broker, agent, salesman, or any person in the business of selling or renting dwellings, is used, and/or discriminatory advertising is used to rent or sell the home; and
- Residentially zoned land and house lots for sale or lease.

Unlawful housing practices under the Fair Housing Act include;

- Refusing to rent, sell, or negotiate for the sale or rental of a dwelling, or to otherwise make unavailable or deny a dwelling;
- Steering persons seeking to rent or buy housing away from or toward a particular area because of their membership in a protected class;
- Discriminating in the terms, conditions, or privileges, services, or facilities in the sale or rental of a dwelling;
- Making, printing, or publishing, or causing to make, print, or publish, any notice, statement, or advertisement that indicates any preference, limitation, or discrimination, or an intention to make such a preference, limitation, or discrimination, with respect to the sale or rental of a dwelling;
- Representing that a dwelling is unavailable for inspection, rental, or sale when it is in fact available;
- Inducing or attempting to induce for profit any person to sell or rent a dwelling by representations regarding the prospective entry of a protected class into the neighborhood (referred to as “blockbusting”);
- Refusing to make reasonable accommodations in rules, policies, practices, or services necessary to afford a disabled person the equal opportunity to use and enjoy the dwelling;
- Refusing to permit reasonable modifications to the premises necessary to afford a disabled person full enjoyment of that premises;
- Failing to comply with handicap accessibility design and construction requirements;
- Discriminating in residential real-estate related transactions and brokerage services; and

- Interfering, coercing, intimidating, or threatening any person in the exercise or enjoyment of rights under the Fair Housing Act, or on account of aiding or encouraging any other person in the exercise or enjoyment of rights under the Fair Housing Act.

The U.S. Department of Housing and Urban Development (HUD), through their office of Fair Housing and Equal Opportunity (FHEO), provides investigation and enforcement with respect to Fair Housing Act violation claims. If probable cause is determined, HUD may elect to have their case heard before an Administrative Law Judge, litigated in the U.S. court with representation by the U.S. Attorney General or the Department of Justice may bring discrimination lawsuits based upon a “pattern or practice” or an issue of general public importance. HUD will refer complaints alleging discrimination under the Fair Housing Act to state or local public agencies for investigation and enforcement if it has certified that said agencies enforce a law that provides substantive rights, procedures, remedies and judicial review provisions that are substantially equivalent to the Fair Housing Act. In Massachusetts, many complaints alleging discriminatory housing practices are referred to the Massachusetts Commission Against Discrimination and other human rights and/or fair housing legal organizations.

Other Federal Civil Rights Laws

Sections 1981 and 1982 of the Civil Rights Act of 1866

Section 1981 and 1982 provide that all citizens shall have the same right to make and enforce contracts and to inherit, purchase, lease, sell and convey real property as white citizens. Section 1982 significantly enhances fair housing protections on the basis of race and color by providing for equal rights with respect to inheriting and conveying real property. Section 1982 only provides for equal protection of U.S. Citizens.

Title VI of the Civil Rights Act of 1964

Title VI states that no person “in the United States” shall be discriminated against on the basis of race, color or national origin by an entity receiving federal financial assistance. The Department of Justice and HUD have also issued guidance on national origin discrimination against individuals with limited English proficiency. Enforcement includes private agreements, fund suspension or termination as well as private lawsuits.

Section 109 of the Housing and Community Development Act of 1974

Section 109 states that no person in the United States shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with federal financial assistance, on the grounds of race, color, national origin, religion, or sex. Section 109 applies to programs or activities funded by HUD’s Community Development Block Grant Program (CDBG), as well as by Urban Development Action Grants, Economic Development Initiative Grants, and Special Purpose Grants. Enforcement includes complaints filed with HUD and private lawsuits.

The Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance. The Act applies to all ages, but permits federal programs or activities to provide benefits or assistance to persons, such as the elderly, based upon their age.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits the exclusion of disabled persons from participating in, being denied the benefits of, or being subjected to discrimination under any program or activity receiving federal financial assistance (excluding vouchers or tax-credits) or under any program or activity conducted by any Executive agency or by the U.S. Postal Service. Enforcement of Section 504 includes HUD (housing programs), the Department of Justice (DOJ) and private lawsuits.

Title II of the Americans with Disabilities Act (ADA) of 1990

Title II prohibits discrimination in housing that is owned, operated or substantially financed by a state or local government entity. HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals. The Department of Justice also has the authority for enforcement.

Title III of the Americans with Disabilities Act (ADA)

Title III is far less reaching than Title II with respect to housing, prohibiting discrimination in privately owned public accommodations. However, housing providers are obligated to comply with Title III in public areas such as a rental office in an apartment complex. DOJ has the authority to enforce Title III.

Thirteenth Amendment of the United States Constitution 1865

The Thirteenth Amendment abolishes slavery and involuntary servitude within the United States, and has also been interpreted to prohibit the “badges and incidents” of slavery, such as segregation.

Equal Protection Clause of the Fourteenth Amendment of the United States Constitution 1868

The Equal Protection Clause prohibits state action and federal action by application to the Fifth Amendment (1791) that deprives any person of the equal protection of the laws. The Equal Protection Clause applies to public housing authorities and some privately owned publicly subsidized housing units. Similarly, the due process clause of the Fifth Amendment prohibits federal action that deprives any person of the equal protection of the laws.

Additionally

Government action that denies equal protection to suspect classes such as race has been subject to strict judicial scrutiny, whereby the government has the burden of establishing that it has a compelling interest and no less restrictive alternative for creating or engaging in a discriminatory policy or practice. Alleged equal protection violations towards other categories of people, such as women and the disabled, have been subjected to less stringent judicial scrutiny.

Massachusetts General Laws, Chapter 151B

Chapter 151B has significantly expanded the classes of individuals protected under fair housing law in Massachusetts. The additional protected classes are:

- Age;
- Marital status;
- Sexual orientation;
- Ancestry;
- Recipients of public or rental assistance; and
- Military history

Chapter 151B also specifically states that it is unlawful “to cause to be made any written or oral inquiry or record concerning the race, color, religious creed, national origin, sex, sexual orientation, which shall not include persons whose sexual orientation involves minor children as the sex object, age, genetic information, ancestry, handicap or marital status of a person seeking to rent or lease or buy any such commercial space.” There is an exception for data that is collected to ensure compliance with civil rights requirements under federal programs and under subsidized housing programs.

Chapter 151B of the Massachusetts Anti-Discrimination Act may apply to all multi-family housing, with the exception of owner occupied two-family housing. 151B also applies to any organization of unit owners in a condominium or housing cooperative.

Chapter 151B does not apply to dwellings containing three apartments or less, if one of the apartments is occupied by an elderly or infirm (disabled or suffering from a chronic illness) person “for whom the presence of children would constitute a hardship.” Additionally, housing for older persons is also exempt from the age discrimination provisions of Chapter 151B where the housing is intended for use as housing for persons 55 years of age or over or 62 years of age or over and receives state or federal aid or tax credits.

Familial status is also protected under the Massachusetts Lead Paint Law, which prohibits the refusal to rent to families with children under six, or the eviction or refusal to renew the lease of families with children under six, because of lead paint.

With respect to Chapter 151B violations, the Massachusetts Commission Against Discrimination (MCAD) in turn investigates and enforces discriminatory housing practices occurring or continuing to occur within 300 days of the filed complaint. If after the investigative process MCAD determines that there is probable cause or sufficient evidence to support a conclusion that unlawful discrimination occurred, the complainant may elect to have their case resolved by MCAD through a hearing, or litigated in state court. If a complainant elects a hearing and does not have an attorney, an MCAD attorney will prosecute the case on behalf of the Commission. If a complainant elects litigation in state court, the Massachusetts Attorney General will prosecute the case on behalf of the complainant in superior court. Aggrieved persons may directly file a lawsuit in court within one year of the occurrence or continued occurrence of the alleged

discriminatory practice, without filing an administrative complaint with MCAD, or 90 days after filing a complaint with MCAD but no later than three years after the alleged occurrence.

Other Massachusetts Anti-Discrimination Laws

Massachusetts General Laws Chapter 184 § 23B

Chapter 23B renders any provision in an instrument relating to real property void, with some exceptions, if it directly or indirectly limits the conveyance, encumbrance, occupancy, or lease of that property to individuals to a specified race, color, religion, national origin, or sex.

Massachusetts General Laws Chapter 12 § 11H and 11I

Chapter 12 § 11H provides that the Massachusetts attorney general may bring a civil action in the name of the Commonwealth for an injunction or other appropriate equitable relief against any person(s) interfering with a person(s) rights under the U.S. Constitution or Massachusetts Constitution through actual or attempted threats, intimidation, or coercion. Chapter 12 § 11I provides for a private cause of action for such violations.

Massachusetts Equal Rights Law

Section 102 of the Equal Rights Law provides that any person, regardless of sex, race, color, creed or national origin, except as otherwise provided by law, shall have equal rights to contract, as well as the right to inherit, to purchase, to lease, to sell, to participate in lawsuits and to receive the full benefit of the law. Section 103 provides persons regardless of disability or age, with reasonable accommodation, similar rights.

Fair Housing Rights of Disabled Persons

Disabled persons enjoy numerous protections under both federal and state laws. Under the Fair Housing Act, a disabled person is defined as; having a physical or mental impairment which substantially limits one or more of such person's major life activities; having a record of such an impairment; or regarded as having such an impairment (excluding current illegal drug use or addiction to a controlled substance). Discrimination against disabled persons includes the refusal to make a reasonable accommodation and/or modification for disabled persons. Additionally, the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, The Americans with Disabilities Act (ADA), the Architectural Barriers Act of 1968 and Massachusetts General Laws Chapter 151B all establish criteria for making new and rehabilitated multifamily housing accessible including additional regulations for those constructed with federal funds. Massachusetts law imposes additional requirements with respect to handicap accessibility than federal civil rights laws including protections for disabled persons with guide dogs, the obligation of owners to pay for modifications, standards for emergency egress access and notification requirements for owners with vacant accessible units.

Protections for Domestic Violence Victims

The Domestic Violence Against Women Act (VOWA) of 2005 (expanded 2013) and court rulings provide protections for domestic violence victims in housing. The Act provides that public housing and Section 8 providers shall not find domestic abuse as good cause for terminating a lease held by the victim, and that the abuser's criminal activity beyond the victim's control shall not be grounds for termination or eviction. Further, Pursuant to regulations governing local housing authorities in

Massachusetts, a local housing authority may find domestic abuse as mitigating circumstances to a finding of housing disqualification due to damage or disturbance during the tenancy. Said regulations also provide that local housing authorities provide "reasonable and appropriate assistance" to a tenant who is a victim of domestic violence, including granting a transfer.

Fair Lending Laws

Discriminatory lending practices violate the Fair Housing Act, as well statutes such as those indicated below, because of the effect they have on housing opportunities. The Fair Housing Act and Chapter 151B prohibit any person or entity whose business includes engaging in residential real estate-related transactions from discriminating in making available such a transaction, or in the terms or conditions of such a transaction, because of a person's membership in a protected class.

Examples of unlawful lending practices include:

- Requiring more or different information or conducting more extensive credit checks;
- Excessively burdensome qualification standards;
- Refusing to grant a loan;
- Applying differing terms and conditions of loans, including more onerous interest rates and co-signer requirements;
- Denying insurance, or applying differing terms of insurance, in connection with loans;
- "Redlining" neighborhoods (denying mortgages and other credit, or granting unfavorable loan terms, in geographic areas characterized by residents of a protected class);
- Steering individuals to buy and finance homes in a particular geographical area based on their membership in a protected class;
- Making excessively low appraisals

The Massachusetts Predatory Home Loan Practices Act requires that lenders with 50 or more home mortgage loans in the last calendar year be examined for their compliance with fair lending laws including the Home Mortgage Disclosure Act (HMDA), the federal Equal Credit and Opportunity Act, and the Predatory Home Loan Practices Act. The Equal Credit and Opportunity Act (ECOA) prohibits discrimination in any aspect of a credit transaction on the basis of race, color, religion, national origin, sex, marital status, age, receipt of assistance from public assistance programs, and the good faith exercise of any right under the Consumer Credit Protection Act. The federal Community Reinvestment Act (CRA) requires federally

insured depository institutions to meet the credit needs of the entire communities in which they are chartered to do business, including low-and moderate-income urban neighborhoods. Massachusetts' CRA statute applies additionally to state chartered credit unions. The Federal Home Mortgage Disclosure Act of 1975 (HMDA) mandates that lending institutions whose assets exceed \$28 million and have home or branch offices within a primary metropolitan area annually report the race, sex, and income of mortgage of home loan applicants and borrowers to a variety of federal agencies.

CITY OF SPRINGFIELD FAIR HOUSING SURVEY RESULTS

AI Listening Survey

Thank you for taking the time to complete this survey.

We are collecting information from residents of Springfield about any experiences you might have had making it hard for you to gain access to housing—to find a place to live, both in Springfield and in surrounding communities.

This survey is confidential—the only information we are collecting about you is which zip code you live in so we can sort the problems residents are facing by the neighborhoods they live in.

We would also like to hear your ideas on how you think the city is doing in our responsibility to “affirmatively further fair housing”, that is, how is the city doing in our efforts to make it easier for all residents to find a good place to live?

1. Have you experienced any of the following in looking for housing in the city of Springfield?

Please check all that apply:

- Can't live in an apartment because you have kids and there is lead-based paint
- Can't live in an apartment or house because you don't speak English
- Can't live in an apartment or house because you are from a different culture than the landlord.
- Can't buy a house because no bank will give you a mortgage
- Can't rent an apartment because you have kids and they don't allow kids
- Can't live in an apartment because you qualify for Section 8 and the landlord doesn't accept Section 8.
- Can't rent an apartment because you or a family member is in a wheel chair and they don't have ramps or elevators so don't accept people in wheelchairs

2. Have you experienced any of the following in looking for housing outside the city of Springfield?

Please check all that apply:

- Can't live in an apartment because you have kids and there is lead-based paint
- Can't live in an apartment or house because you don't speak English
- Can't live in an apartment or house because you are from a different culture than the landlord.
- Can't buy a house because no bank will give you a mortgage
- Can't rent an apartment because you have kids and they don't allow kids
- Can't live in an apartment because you qualify for Section 8 and the landlord doesn't accept Section 8.

-Can't rent an apartment because you or a family member is in a wheel chair and they don't have ramps or elevators so don't accept people in wheelchairs

All of these "reasons" for denying you or anyone you know housing are ILLEGAL. It is against the law for a landlord of bank or other lending institution to discriminate against you because you have kids, because of your race, because of your age, because you are gay or lesbian, because you or someone in your family is disabled, because you don't speak English or are from a different culture.

Housing discrimination is WRONG and against the law.

3. How do you feel about the city of Springfield's' effort to make it easier for everyone who lives in Springfield to find a decent place to live?

- Outstanding
- Good
- Adequate
- Not Good
- Horrible

4. Have you participated in any city planning meetings? Yes no

If yes—what meetings? _____

If no—why not? _____

5. Please tell us what would make it easier to participate in city meetings?

- If we provided childcare
- If we provided transportation
- If the meetings was held in your neighborhood
- If the meetings were held on the weekends
- If the meetings were held during the day when my kids are in school
- If the meetings were held in the evenings when I didn't need to work
- If there were translation services available because I don't speak understand English very well
- I'd rather participate in an on-line survey like this one
- Other – please specify

6. Do you feel like the city is hearing your concerns? Yes no

7. If yes to above question--what has the city done to make you feel heard?

8. If no, what has the city done to make you feel excluded?

9. Please tell us how you think the city could do a better job making it easier for everyone in Springfield to find a good place to live:

10. Please tell us your zip code so we can better understand where housing issues exist. (circle one)

THANK YOU!

Survey Results

Question 1: Have you experienced any of the following in looking for housing in the city of Springfield?

A total of 204 survey respondents answered this question, 40 shared written comments.

Answer Options	Response Percent	Response Count
Can't live in an apartment because you have kids and there is lead-based paint	31.4%	64
Can't live in an apartment or house because you don't speak English	8.8%	18
Can't live in an apartment or house because you are from a different culture than the landlord.	25.0%	51
Can't buy a house because no bank will give you a mortgage	64.7%	132
Can't rent an apartment because you have kids and they don't allow kids	20.6%	42
Can't live in an apartment because you qualify for Section 8 and the landlord doesn't accept Section 8.	27.0%	55
Can't rent an apartment because you or a family member is in a wheel chair and they don't have ramps or elevators so don't accept people in wheelchairs	12.3%	25

17 of the written comments indicated that respondents had no comment or that the question was not applicable.

5 respondents indicated that they own their own homes so the question was not applicable.

The following additional responses were received for question 1;

IT HAPPENS ALL THE TIME GIVE ME A JOB AND I WILL SHOW YOU

Can't get voucher from city - disabled no minor children

Can't get voucher from city - disabled no minor children

My realtor wouldn't sell me a home outside of Springfield, I am black. Landlords where taking money under the table, as with most, beyond section 8 amount, and not on a lease.

Mostly, they look at the household income.

I can't live in my own house because I don't make enough money and don't qualify for any of the above assistance. I also can't live in certain parts because I don't speak SPANISH!

Rents are too high especially for 3+ bedrooms

People were sometimes reluctant to rent due to pets but these were not issues I faces as a renter. People were actually quite nice.

Due to price and credit issues.

we were steered by real estate agents away from multi-racial and predominantly POC neighborhoods to white neighborhoods when we were looking to buy a house (we are white)

disabled no priority for vouchers, LIHTC not affordable

It’s hard to find a nice market rate place downtown.

AGAINST the LAW should have been capitalized as well. I am of several instances where families with young children were directed elsewhere due to rental unit not dealed. Also this survey did not provide a specific space for responding to "affirmatively further fair housing"

I can get an apt because of bad credit.

was being evicted for having an accommodation pet and had to move

no. however, I was told, as a nonprofit developer that it was rye hope that we were not going to provide housing for people with disabilities because it was done once in "this house", and it didn’t go well & Springfield has too many of these types of places that bring in no tax dollars.

So far I haven't had problems to find housing, but probably I wouldn't get a mortgage from no bank because of my credit score.

It is not illegal for a bank to deny you a mortgage if you do not qualify. Not sure all of others above are illegal either, at least for one to three family properties.

Question 2: Have you experienced any of the following in looking for housing outside the city of Springfield?

A total of 70 survey respondents answered this question, 25 shared written comments.

Answer Options	Response Percent	Response Count
Can't live in an apartment because you have kids and there is lead-based paint	15.7%	11
Can't live in an apartment or house because you don't speak English	4.3%	3
Can't live in an apartment or house because you are from a different culture than the landlord.	18.6%	13
Can't buy a house because no bank will give you a mortgage	72.9%	51
Can't rent an apartment because you have kids and they don't allow kids	17.1%	12
Can't live in an apartment because you qualify for Section 8 and the landlord doesn't accept Section 8.	14.3%	10
Can't rent an apartment because you or a family member is in a wheel chair and they don't have ramps or elevators so don't accept people in wheelchairs	4.3%	3

14 of the written comments indicated that respondents had no comment or that the question was not applicable.

The following additional responses were received for question 2;

Can't relocate- no voucher for disabled without children

Can't relocate- no voucher for disabled without children

I work, no section 8 anymore, landlords want CORI/credit checks provided all personal info, and you have to pay for that or no home
 Income is problem
 I have lived here my own life and want to stay. However they're allowing more and more section 8 and not holding landlords accountable for anything. Pay your trash fee and let's clean this city up. I want to move out of my parents' house!
 Rents are too high for 3+ bedrooms
 Own a house
 I have never had any issues either with renting for two years or purchasing our home.
 I want to live outside the city but there is a residency ordinance forcing me to send my kids to either private or Level 4 schools
 I bought a house. These do not apply to me
 Disabled no priority for vouchers, LIHTC not affordable

Question 3: How do you feel about the city of Springfield's' effort to make it easier for everyone who lives in Springfield to find a decent place to live?

A total of 504 survey respondents answered this question.

Answer Options	Response Percent	Response Count
Outstanding	11.9%	60
Good	24.0%	121
Adequate	23.6%	119
Not Good	24.2%	122
Horrible	16.3%	82

Question 4: Have you participated in any city planning meetings?

A total of 516 survey respondents answered this question; 423 participants (82%) indicated that they had not participated while 93 participants (18%) shared that they had participated in city planning meetings.

Question 5: Please tell us what would make it easier to participate in city meetings?

A total of 451 survey respondents answered this question, 38 shared written responses.

Answer Options	Response Percent	Response Count
If we provided childcare	15.3%	69
If we provided transportation	23.7%	107
If the meetings were held in your neighborhood	40.6%	183

If the meetings were held on the weekends	28.4%	128
If the meetings were held during the day when my kids are in school	12.0%	54
If the meetings were held in the evenings when I didn't need to work	30.8%	139
If there were translation services available because I don't speak or understand English very well	5.8%	26
I'd rather participate in an on-line survey, like this one	44.3%	200

The following additional responses were received for question 5;

They don't have enough information of when meetings are

More reasonable notification so more people could attend

Citizens need "Welcome Kit" with intro materials

Citizens need "Welcome Kit" with intro materials

Announcement of where and when on TV

Languages are so difficult to understand

I would prefer paper and pencil/pen

If the meetings were better advertised and with ample notice.

AFTER SCHOOL

Currently flexible on my schedule but in the future it may be mostly evening meetings.

Will there be coffee

More advertising

I would like to speak-out my thought and idea!

If I thought it wasn't just lip service, but I think it is pointless.

More advertising

I care so I made arrangements and went

Weekends, evenings and/or online surveys

Meetings made available

Na

I always find out about the meetings AFTER they occur.

If there were more info on home improvement grants

I just don't have the time in my day to participate, at this time in my life. If I had more time, I would probably participate.

If the meetings were advertised through email like this survey

I don't know when the meetings are. Need more advertising.

Notification

All of the above.

I bought a house. These do not apply to me

If I knew about them

If we are aware of meeting dates

Knowing when and where the meetings are
More promotions done, i.e. news, thru schools, stores, etc.
Provide light refreshments
No need for evenings, I don't like work
I like to get it (the information) straight from the mouth-in person meetings are better
I honestly believe that if Springfield city decision makers LIVED in the City where they draw their paycheck it would be different.
The current meeting should identify Future Agenda Issues.
If I knew about them
If there were competent people present

Question 6: Do you feel like the city is hearing your concerns?

A total of 440 survey respondents answered this question, 164 shared written responses. 285 respondents (64.8%) felt that the city was not hearing their concerns while 155 participants (35.2%) felt that the city was listening.

The following additional responses were received for question 6;

LIFE IS A WORK IN PROCESS AND WE ALL HAVE TO WORK TOGETHER TO MAKE A BETTER AND STRONGER COMMUNITY FOR OURSELF, OTHERS AND OUR FUTURE CHILDREN
Too many violence. Not enough patrol out visible.
Not enough information out there
Because everyone talks no one listens
They don't listen
Doing much better now than 6 months ago
Slowly
When the right people speak, it is heard
Too many issues
A lot of meeting taking place but no results
Unaware of when and where meetings are being held
Let the plight of Homelessness in Springfield attest to the lack of full concern for the underprivileged.
Reasonable accommodations ignored
Reasonable accommodations ignored
Because there's still a lot of homelessness
Public have the right to be informed especially with issues concerning the community as a whole
the need for more affordable housing has been an issue for quite some time, and being that there are so many abandoned buildings, the city should invest in making renovations to these homes instead of just leaving them sitting there for years. Feels like nothing major is being done
We would have so many people homeless
No and yes. Some schools are too big for K-8 with almost 1/2 kids extremely defiant, not schools fault, but solutions? I have some suggestions as a mental health counselor, and I will begin attending meetings if I am aware of them

For the many years I've been in SPFLD, I haven't seen any change for Low/Middle class residents.
I've made several complaints about the abandoned house across the street but nothing is done to remove garbage or stop it from being broken into.
Because nothing gets done even when you bring any issues to their attention
My rent is based by income but I can barely go through the month with what is left of my pay
I haven't voiced any concerns to the city.
Our neighborhood has been breaking in nothing has being done
Not myself but other with the trash fee etc.
Less communicate with newly arrival who are very limited English and not able to find the jobs, no money to pay for the bills, no transportation for hospital or clinical appointment.
Too political
I call and never get a call back
A lot of bureaucracy involve
Because the city is not getting its information from the demographic of people who need it most.
Currently more houses that was not in a severe or
They put you in a shelter & leave you there I was in a shelter for a year before I even talked to someone.
I have not addressed any concerns
They make it difficult to get into a shelter and then they do little help to get you alt. They try every way to put you out.
I know they are too worried about a casino, than helping those who are truly in need to be happy and treated as people.
Because they are rude, mean spirited people. They always want to be right.
Because if we have low income we can't move anywhere it has to be with the Mgt. your with.
No listen to people.
Because it's all about them and money
Not listening to the people
Because it's all about them and money
Because they is all about them self and money
Still homeless
I feel that they will not hear my voice.
People are excluded for lack of available info...
No changes are made to the system
I don't think they ask or care
No money no power no voice
Crime is too high; break ins; assaults; unsafe neighborhoods
They hear the concerns but they don't know what to do to fix it.
Politicians continue to say they will work on quality of life issues but it is evident it continues not to be a priority
When I call 311 such as dead tree stumps, no one responds.
I found the rent too expensive for me to stay in Springfield, and many of the well-kept site based housing options have years long wait lists. Those that have shorter wait-lists are often ridden with crime and pestilence. While the housing authority does listen to concern, very little change to housing problems are

made. I work in Springfield and would like to live in Springfield again if changes are made to rental programs, or if more is done with local lenders to help low income buyers purchase homes not in complete disrepair.

Not enough info no easy access

Don't care

Ignoring the residents, politics heavily involved

They simply don't care

Our schools need work

Don't have any concerns

I haven't voiced them.

My concerns are high crime and cost of living in the city

There are so many abandoned building and houses that look like they're falling apart. It makes the city look like trash. They make the city look unsafe.

Too many people moving away from the city because of inadequate housing.

It feels that the city only listens to a small group of people. We can't get speed bumps, but we can get a casino. And where is the investment in the poor communities, so they are not so poor. A woman was hit by a car, because of the lack of good lights and crosswalks. Where is the help for people to get condos, or homes, or nice rentals?

They need to get the crap out of here

Get feedback from city officials

The roads are horrific, I pay a lot in taxes and there really bad schools!

I think everyone meets to make it seem like a joint effort but really the powers that be do what they want

If we want to make the effort for someone to listen, there is always someone you can call who will take your concern, city council member, school comm. member.. 311 line...etc...

When the school my daughter went was voted to be charter school

Everywhere for subsidy housing is long five year or more waitlist.

Because I'm Asian

No concerns

Charter Schools beginning with SABIS

N/A

Sometimes. Depends on the issue.

I have lived in a certain area for quite some time and it is going downhill. The city allows these families to be pushed into certain areas and the families coming in are not taking cares of the houses or property.

I wish they had home improvement money to help elderly people fix their homes without going into significant debt

No reflection or improvement to complaints

Owned property in Springfield for 25 years. They never listened to us then. Now I live with my sister-in-law (help her pay bills in lieu of rent)

My concerns revolve around the living conditions my students experience.

I believe the mayor already has political ties and is corrupt

Didn't know the avenues for my voice to be heard.

I haven't moved in 30 years. Out of the loop.

People don't want to live in Springfield because the schools are terrible! Fix the schools and people will come back to the city!

No opinion

I haven't really had concerns.

How do they hear my concerns if they don't bother coming around asking. Where can we even complain I feel I'm on my own.

I haven't been able to attend one of these meetings because I feel like it's not advertised enough to of them.

The taxes for services provided is out of control

Have attended neighborhood meetings and not heard, also the neighborhoods have excessive noise issues.

Traffic, trucks, motorcycles, music..dogs..noisy neighbors when.

Taxpayers paying too much hard to make ends meet

Don't have any concerns

I have a wonderful house that I work very hard for and the only people who complain want everything handed to them. Spfld. offers too much. Why not send the people who do not work and can't afford proper housing to the suburbs.

I no longer attend meetings. I used to in the past but felt my voice, opinions, ideas, and suggestions were completely irrelevant to those who could do ANYTHING about ANYTHING..... So - this makes the people of Springfield STOP attending meetings and STOP giving input.....

Several complaints of zoning/code violations have not resulted in the problem being taken care of properly.

The few issues that needed to be addressed have been

Still a lack in affordable housing

Hearing the concerns is not enough, action is required that is geared to support those w/out a voice (i.e. low income, non-English Speaking etc.)

I'm sure they hear my concern, the question is "What action is being taken?"

Old people, old ways. Everyone has an excuse why it can't be done, we need doers not historians

I have not voiced any concerns

I vote

I feel they listen to very rare bits and pieces

I feel they understand the problems with the economy and are trying to bring in the casino to create new jobs. I think Mayor Sarno has had enough of the violence in this city and is working on a no tolerance plan and works closely with the police department to enforce the law.

Because I feel that they don't take the time to listen to people and our needs.

The vast majority of homes in the "City of Homes" are deteriorating. Why not look to other ways to advertise housing? Such as the amount of ponds and waterways where a person can have "waterfront" living? Why isn't that offered, promoted, or even capitalized on?

Having housing difficulties and still no help

Everything is about bringing the casino in (which we all know is going to happen) and corruption...I've seen it firsthand. There are good things about Springfield but I don't feel like residents real concerns are truly cared about....the facade yes, the action, no.

No print copies of consolidated plan circulated to public

Because I Still have issues finding a place to live.

I can't get my children back from DCF custody because I can't afford first, last, and security on an apartment and I can't get help with housing w/out them so it's a no winning situation.

Where I'm homeless, The City treats me like I have no rights.

And no

Absolutely no

Cause it's just too hard to find apartment for a sex-offender.

Maybe -sometimes

The city does not really want to hear low-income/renters concerns. The City comes across as if their major concern is for single-family housing being built.

We need more affordable housing

Because I am income eligible but on everyone's wait list

But I don't talk to them much

City does not care about poor people and poor neighborhood

Affordable housing is very difficult to obtain. Landlords and banks are not making it easier. I would like the city to make a bigger effort to create new and more affordable and public housing.

Because it seems the agencies are either not concerned or they're just giving help to particular people.

They seem to be moving on a faster pace

I feel like the city is not hearing our concerns because I have the feeling that city is planning w/out the community, and the people share their ideas. I feel like is their way or the highway.

Because I am still

Because I am still homeless

Learn more effective communication

This is very recent and there has been no open communication between high ranking officials-and families, beyond belittlement.

I haven't been very vocal

Same as #3

Cannot respond

Feels like they only respond when issues are in the forefront. When an issue is in the news, media etc. as soon as it's not things get dropped or go back to how they were.

No they continue to overlook

This is why the shelters are over crowded

I don't get enough free stuff

The city often hears the concerns of the residents but it is difficult as a resident to track the city's progress or receive updates on an issue/concern

I don't know because right now there is nothing for low income folks. Friend has been on low income housing list for 8 years while others are on for 3 months and get it. How do they pick?

Every time I look for housing no one wants to help me.

City staff only work for themselves and people in their class--they tend to only help themselves and put us [minorities] aside. You don't have a voice.

Not enough is being done

Very few "Hispanic voices/concerns" addressed.

Lots of abandoned houses and buildings.

The mayor already said "I do enough for you people" got on tape.
It seems as if I desired to, I could find a place to voice my concerns
Haven't expressed any concerns
I had Mr. Richard Allen hang-up on me when questioning him on why as a nonprofit, who owns our building, are required to pay property taxes.
300 Block of Bay Street reflects the entire City. Crime, Blight, EPA, Zoning, etc.
I don't feel like they take the time to listen to the public.
Well I have been a resident in Springfield for over 2 yrs now and I have not find out of any meetings
Because the things I have concerns on, they haven't made an effort to change or look at.
The issues are getting worse with no options.
Haven't spoken up yet
They need to allow for other ideas around what a "home" is, as well as plant more gardens with all these abandoned lots
No effective responses.
We need less government
By the City responses on flyers
No I think they need more staff and monies to the right thing in the city
I'm not sure because I haven't spoken about my concerns as a citizen.
It seems no matter what the community say the city already have plans.

Question 7: If yes to above question--what has the city done to make you feel heard?

A total of 111 survey respondents shared written responses to this question. 16 of the responses received indicated "nothing," "not much," or "nothing ever." Four participants shared that this survey made them feel heard by the city.

The following responses were received for question 7;

THIS SURVEY FOR ONE

For example, On Union Street past Hancock Street walking westbound people standing outside selling drugs and other contrabands/ illegal substance and no one is driving around or at least a community policing.

Has made housing available to some people by lowering the income guidelines

Have connection with Friends of the Homeless

Help people with CORI

Progress

Mayor is on TV more

Let me speak when I want to

Got housing

Give me housing

Working more on shelter

Whenever I've had the need to call the City with concerns in my neighborhood, I have seen results immediately.

Because the rebuilding of the city was pretty quick
Nothing at all, I believe before issues are address surveys just like this would be a Great way to be heard.
We have contact with Springfield Housing Authority in an attempt to house individuals served.
I hear the mayor speak of some of the issues on TV, and I've seen him attending many meetings about many issues on TV and in person
Always accessible
Fix State St.
Moving toward representations make City Counselors more available and more receptive to concerns
They have met some of our requirements
Made it easier to find housing.
Make info more available to people. Not everyone has T.V. Or computer. Get churches involved. Have info more available at soup kitchens and other places...
Not helping
I feel like I can contact City Hall when I have concerns.
I do hear and read what is going on from the newspaper, TV, and internet.
We talk to the police that patrol our neighborhood but we get the most support from the Springfield College Police.
This survey.
Offer informational meetings
Mayor and city councilors are always willing to listen to my concerns.
My city councilors are accessible
People don't have good credit
I feel fortunate to live in a neighborhood where we have a lot of concerned neighbors whose VOICE is heard at city meetings, etc.
"Following through on the contracts,
Open communication about changes,"
Lowong fees, cleaning the city up
Better schools
I check out their website. I know I can call 311 with any complaints. The Mayor is very receptive
I don't have any real issues, but, besides the trash fee, things seem okay. (I would like a trash fee that was cheaper as I only put out my trash a maximum of 1x per month.)
Nothing. 311 is rarely responds to my issues or my concerns. Talking to many city departments is difficult unless you are "important". This city suffers because it is not inclusive.
There have been efforts to replant some of the foliage that was torn down by the tornado
Nursing union
More police patrol and faster response times
Emails or phone calls
Connect ed calls telling of meeting ,informational number available for any questions
I feel as if the city tries to be inclusive of everyone and put the needs of its residents first.
The 311 line is great!!
My daughter's school was voted to be Charter School by City Council.

My husband attends the Outer Limit meetings and the 16 Acres meetings. I do not attend, as he provides me with the necessary information.

"Forest park crime meets

Ability to ans ?,s through 311"

Discrimination

Listened to our concerns for education by working forward for charter school back when they were first installed in the city

Any time I have voiced an issue I have heard a response

This survey is a good start.

"Establishing the 311 phone line, however, I have called the phone line several times and the person did not know the answers.

City's web-site

When I report matters, it is looked into

I feel Springfield is a very open city with a great deal of transparency to the decision making process.

I have written inquiries and have been contacted within a reasonable amount of time.

Offered online surveys and provided an opportunity for me to voice my opinions.

There are a variety of ways to reach out and voice concerns that people have

Quick response by the police to reported incidents.

I live in a great neighborhood in Spfld. The neighbors keep their properties nice and we have no troubles. If I have a problem, I call 311 and they deal with it. The people who complain usually do not offer anything but problems for the city.

I work for the City and know that the employees do what's best for the City. In some areas we have budget issues but can't do anything about that right now.

I have appreciated the 311 service. It's one call to someone who is friendly and knows where to direct my call. Often they take care of the issue directly & I don't even have to make any other calls.

One visit to the violator was made.

Responds to my concerns and my requests

Responds to my concerns and my requests

I could see the suggestions implemented and completed.

I like 311; I have used it and get a response.

They have responded quickly to the 1 complaint I voiced through the 311 system.

This survey

Not sure.

Homelessness initiatives, vacant and foreclosed property ordinance, cleanup of Longhill Gardens, redevelopment projects in the South End

Speak out at City Council meetings

Fighting Blighted property

City council meetings have a period for public speak out.

Made it easy to voice my opinions

311 is helpful

Mayor's office is very responsive

Participating in Neighborhood Council meetings.

I can't imagine how you could possibly make it easier for anyone ...asking if they need childcare, transportation, translation. online.....

Recently met with Office of Housing to submit comments on action plan

If I could get some help for me and my wife so we could get our children back.

They have done nothing to hear me out.

Not much. It seems the government wants this subject under wraps

Build house for the tornado victims clean up certain areas that needs to be done

Nothing they could do much better

Being on the waiting list

This website may be just what the city needed.

Meetings being held

Inviting me to different housing meetings and talking to the families and homeless and others organizations in our community.

Put up this survey for one.

Nothing. Our City Councilman said he would look into a situation and the paperwork I prepared presenting "my case" as to why we who holds a 501 c3 are required to pay property taxes, I faxed all of the documents, he agreed to review, then called him as instructed. He refused to answer his phone, so, I went to the City office and ask for the call to be placed from a City Hall telephone...He answered right away, and before the person making the call on my behalf could tell him he was on speakers phone, and that I was in the office with Him. He exclaimed! "That woman sent me all this paperwork, I ain't calling her back". The person making the call looked at one another, we were both horribly embarrassed. I let his office without saying a word. It's clear to me, Springfield City Representatives I've encountered are not interested in serving the interests of the Constituency in this City.

I think that adding the shelter/hotel accommodations for those in transition was definitely a good look for the city.

Speak out at City Council

I think a letter should go to each one that signed up saying thank-you for coming and a follow up letter reporting on the ideas presented at that meeting that are being put into practice."

By distributing flyers thru neighborhoods

Public council meetings in my neighborhood

Question 8: If no, what has the city done to make you feel excluded?

A total of 196 survey respondents shared written responses to this question; 20 participants responded with either "nothing" or "not applicable."

The following responses were received for question 8;

I feel like city hall is a game rigged in favor do moneyed corporations and rich men like MGM, MassMutual, PeterPan Bus and Peter Picknelly. The mayor and city officials should have more communication with citizens, by visiting them in their neighborhoods. City officials need to stop riding the desk, down at Court Square.

Not enough low income housing
Need better place of location to discuss these issues
They come up with ideas but then they don't follow through
Not making reasonable rent rates and don't include lights and gas
Not hearing
CORI
Give us a chance
Don't address issues that I have with housing
No results from the meeting they have
Not helping the homeless with opportunities
I receive no help at all
They don't listen to anybody
Being lied to and not following thru on promise. Not remembering promises made.
Denied reasonable accommodation requests and responses with no facts, appl law
Denied reasonable accommodation requests and responses with no facts, appl law
Establish a housing task force, which includes actual constituents
I feel casinos in a residential area, equals all of Springfield, many residents downtown, with the crime and poverty levels is horrible. these people can't afford this, it's as though the city people don't matter. a lot of
There are tons of boarded up buildings on this street, not to mention drug activity that seems to go unnoticed
Have gone to numerous housing fairs sponsored by the city and nothing ever comes of it.
Classism
Lack of services to the community
I do not live in Springfield and have been working for the City of Springfield for 27 years.
Reduce crime
Educate the ignorant
Educate parents
Sometimes ignore
Conflict scheduling
It takes months before they usually respond.
The city has allowed these same sets of code enforcement worker to continue to illegally condemn my home & more homes under falsified housing conditions in order to own the properties. Then Lisa Desousa, Dave Cotter & Juan Martinez deliberately refused to give me a "Appeal of the Condemnation" after I turned it in to their office in person. Also Cotter and Lisa showed unfairness to taxpayer, tenants, and homeowner by taking sides in the illegal foreclosure crisis to do private business and gain for themselves.
They don't tell you anything
They don't give us too many resources.
Not Listening
No good communication
The school system is slow
There a lot of racism
If some of our issues we are trying to get fixed get fixed

Nothing has been done that I can see they are too busy planting trees claiming there's no money
Have denied my reports
Point me in the right directions for housing
More surveys
Don't give enough information about housing
Not helping people get housing or put homeless people in their own apartments with incomes
Mortgage being too high. Even though people on disability.
Holding an eviction notice to find another apt to find for family.
Know the people. Not every fits into criteria set. Again not everyone has Computers, Televisions or cellphones. Some people have money but waste it on living arrangements and eating not to exclude traveling.
More surveys and flyers
Not doing to help people needed
Listen to the concern we have
Long waiting list
Send questionnaires to my home
No communication
In Springfield there still is very little decent places to live and the places getting the grants are putting on a good show on the outside but not really doing their job as good/responsible landlords. The problems about safety, security, and reliable living options that I've heard for years have still not been fully addressed if addressed at all.
Not made us a real part of the casino initiative.
No particular outreach.
There are excuses as to why trees are not removed or there are dead stumps.
Single mom who isn't working
Not conduct surveys like this one sooner.
Not holding meeting on days that people can attend.
They are not helping those who are trying to make things better in their life. Not everyone has Section 8 so why do they only cater to them. Some of these people live in lead housing, The people who rent out to people don't pay attention to the property.
Feel like I'm a number not valuable
In my opinion, this city caters to certain groups. I have lived here all my life, whether it be housing or benefits/ having to call on the police, the discrimination is blatant!
Housing shortage
No one offers help to working people that fall in the middle class. I struggle to pay for my housing and I don't receive any help. I also watch those who don't work (but are able to) live in the same apartment I do for free????
Unless you are politically connected with local politicians you will get nowhere
"Residents are not respecting their neighbor's quality of life. Noise, Trash, Properties dirty, falling apart.
The city does very little to help those that try to make spfld a healthy place to live."
Treating parents poorly within school system

Not real sure why the parks in other neighborhoods are being redone and have "water parks" and Nathan Bill has NOTHING!!!! The fields are terrible (not adequate for soccer games!), there is broken glass everywhere, "lovely" inappropriate pictures are spray painted on the playscapes and the ground. It's in a nice section of the city and it looks like crap! It's an embarrassment when soccer games are played there and the kids kick up dust and it's nothing but a dust bowl! Or it's muddy and there are holes all over the place. PLEASE FIX NATHAN BILL PARK AND MAKE IT AS NICE AS THE OTHER PARKS AROUND THE CITY!!!!!!

I have e-mailed the mayoral assistant and I am yet to receive an e-mail back.

Question 5 isn't a yes no question.

The abandoned buildings remain. They are not being restored or torn down. They make the city look like an unsafe place to live. I don't wish to live on a street that looks unsafe because of the run down building. My husband and I live in Springfield and we like our street because it is quiet and the homes are properly maintained.

Not enough affordable housing

Nothing. I'm moving away first chance I get.

No one listens

There are no plans to fix the roads, schools, or the taxes that works well for a lower middle class resident.

"Is this for question #6? Administrations within the school system have negatively or not have answered my questions concerning the well-being of students and technology presented to those students.

Not listened to adequate solutions to issues with respect to school. Example: First dept. meeting with new administrator (took over for April Huckaby and not sure I should mention names) inquired why the new Putnam did not have a computer lab for mathematics labs. Suggested the conference room on first floor could be modified to suit demand for students to utilize computer simulations/programs in order to achieve a deeper understanding of mathematical concepts.

This administrator (following me ask the same question) stated, ""Not going to happen."" This went on several times during the meeting."

should

That they help everyone including young people who are trying to find affordable housing that's not just apartment buildings.

It seems like decisions are made regardless of the peoples input.

Not affordable some times the price of the home or apartment tells you where you can live at. Some times that is done on purpose. Also all of us don't get help equally.

I believe they are overwhelmed with the housing needs and lack of funding but because I am not on the priority list of homeless, domestic violence, etc.. There is not much of an option for me but to wait years with the exception of possibly never receiving any rental control help.

I honestly feel like if I do attend meetings my voice will not be heard because I am not politically connected. Parking fees for school employees--employees took an effective \$1000 pay cut and were never given an opportunity to offer feedback. This is typical. On other issues, feedback is welcomed.

Winchester Square is always forgot about. The city wants your money for taxes and you cannot even feel safe in your home or on the street. People are moving in from areas tearing up things and bringing in drugs and the city does nothing. Only certain areas are taken care of. They do not even street sweep the area

Not really addressed it at all. Habitat for humanity hasn't come to our community to help my parents out much.

Sewer issues. Ignores Mc knight area

"Ignored our request to pave Talmadge Drive. (Hasn't been paved in 50 years) Had to call to get road plowed. Had to call to have trash picked up. Had to call to have the city shovel the sidewalk between Talmadge school and Kiley (city owned property).

City was very slow responding. Paid taxes in this city for 25 years and expected better."

Teachers are not heard when it comes to concerns about their students OUTSIDE of school n

My husband and I have made the effort to not be a part of White Flight. We have stayed in the city and have lived here for more than 20 yrs. When we have called for side walk repair we get a run around. When a tree was removed in front of my house by city employees they never came back to grind the stump ... or replace the tree with a healthy one.

Mayor made casino choice without considering the horrible effects on community and traffic, then asked for a \$40,000 raise

No notifications to my household.

We have beautiful neighborhoods, affordable homes, but terrible schools. No young families want to live in the city because the schools are so awful. We need to fix the schools and our entire city will improve!

I have never addressed them properly to anyone.

No effort is shown to get community input.

Neighborhood school is not suitable to my scheduling needs

There is the HUD's policy to help city employees (Police, Firemen, Teachers) in purchasing selected housing in certain areas of the city. These places are usually in undesirable areas which as a single educator, I don't feel confident investing a mortgage and time into these "castoff" housing choices. I think that a program like that should allow for housing choice (within a price range).

My opinion does not matter.

Handicapped facilities and access limited.

I met the mayor, and brought up some concerns, which he dismissed. My house was broken into, and the responding police officer stayed for about 3 minutes and left without asking if I had anyway of securing the house.

Housing, thankfully, not a concern

Not "doing".... They (the ones who have ANY control over ANYTHING) "listen" and maybe jot some notes down, all the while making EMPTY promises.....

Not getting the problem of zoning violation resolved.

Have never asked what my concerns or problems were

Question 5 isn't a yes or no question.

Meetings are not announced to the public, and are only held once.

The supportive services throughout the city are not easily accessible, community involvement must be attained throughout the Hispanic communities. And the social workers within the city lack empathy and basic customer service.

See improvements

I haven't heard about this meetings. More advertisement should be done.

When you call the city with a concern, you get bounced around like a ping pong ball, finally when your concern is taken you are left with the insecurity if your issue is really taken care of. No follow-up or solution.

They hold hearings for input but don't follow through on suggestions made or on implementation or they go against the input given

Bend over backwards for the bums and criminals at the Worthington Street shelter and handouts to all the others who contribute nothing and take no pride in this city.

I wouldn't say it is what they have done to make ME feel excluded, it is more of making CITIZENS as a whole to feel that way.

Not making sure are street are safe,

Despite additional ward representatives, some of the newest city council members have begun to act like they are little "kings". The city council, or the individual councilors, has never conducted any surveys asking for people's opinions, or if they have, then the answers have never been published.

I am not notified about meetings.

The city doesn't have a fair communication system to inform residents about meetings and ways to participate in planning decisions.

See answer under #6

withholds grant award and subrecipient award information, details not posted on website, not getting notice about funding when available

Not inform of meetings

Feels like Spfld Still has Cheap places but not I good areas and not up to living Standards. I also feel as though you guys don't see all that happens you need to be more involved.

Not enough Affordable Housing

They don't hear me because I am homeless and a Nobody to Them

Because I can't get my children back w/out an apartment but can't get help w/out them in my custody

When I held a sign saying "Homeless" In Need go Help" they tried to put me in jail for panhandling for asking for Help

Police harassment, hospitals being hostile towards me.

Never mind

"I have a record so I can't get an apartment. Everybody deserves a second chance."

My Cori

Push that sex-offenders can't live in an apartment setting. Only shelters, or men based housing. But, I am married.

By telling the residents what the City has already decided to do.

EVERYTHING no mailing to the city of Springfield

The city is governed by a 'club' of people, most of whom are unelected.

Communication

They only refer to places that have long waiting list

Nothing in particular, but lack of info and feeling they wouldn't be receptive

City needs to clean up poor neighborhoods and turn empty houses to affordable housing

The city makes it difficult to access this survey. It does not take into consideration of the needs of homeless families.

They have turn me down with getting in to a shelter with my 3 kids do to what happen in my home.

They do nothing for the poor

Affordable Housing

I feel the city needs to work more to help homeless in better housing

Just doesn't pay attention to poor people

Ignore me + others

Cause I'm homeless

Cause I'm homeless

Not quick enough

Not helping

Income requirements. Family composition.

I feel excluded due to my race. I've applied for several low income, section 8 etc. and it seems there helping different ethnicity more than the Caucasian.

The same things that has been happening such as high crime, poor schools, no jobs, wasting money,

Make it difficult for the people to get involved.

The City is not moving towards inclusion of educating property owners on Fair Housing law.

Has turned their eye towards the racism

There is so many boarded up houses in the area, why not make it affordable for people to fix them up and live in them or rent them out.

I feel I should get more free things given to me

Not a matter of exclusion per se but one of poor communication. All of the primary departments need to have at least quarterly sector meetings similar to the ones held by police and public safety. No everyone can afford a newspaper subscription nor does everyone have internet access. The call reminders for the sector F meetings are very good.

I haven't heard anything from the city. I get everything done for myself. City hasn't done anything to help me.

No help

They don't return phone calls and they are rude to people in person. They only work for people who have credentials.

Because I was not born white or Irish, I don't deserve the same opportunities as individuals who are of Irish decent.

I feel that the concerns addressed are in the community that are not diverse and multi-cultural.

Lots of places that could be of good investment for fair and affordable housing just going to waste all around the city making the city look dirty, careless, abandoned and unfit for good quality living.

Refused to hear our concerns. Listening only to homeowners and business owners.

I've been on a sec 8 waiting list for about 15 years.

They hear about the concerns yet always seem to find an excuse as to why changes are not happening

Making hard to qualify for a mortgage loan

No rent control. Use their brain to come with or utilize programs already around to repair abandon housing

No answered questions.

They should have town meetings in every neighborhood for those who are handicapped and has no transportation and make it convenient for those who work

The so-called quality of life that the mayor pushes, is *****! police riding about, ignore loud music, cars double and triple parked,, people walking against the traffic lights, amazing more people are not hit or killed

"There is more to tell....I called the Chief of Staff office numerous times to never get a return phone call. Finally, I email her on a LinkedIn account, as we were connected. She was mortified that I would send that this sort of ""thing to her on LinkedIn. We made an agreement that I would call her office. I did, regarding being a Nonprofit being charged Taxes... Her response was that she wasn't privy to what and how the Assessor's office works, as she just ""stays in here lane"". I thought as the Chief of Staff, she controlled the ""highway"" of what and how it happens in the City offices."

I have not actually voiced my opinions

There isn't a lot of notice. Language barrier is a definite and rents are still rocketing high.

We are underserved and nobody knows if we resident of the city

"It breaks my heart when my students are told they don't qualify for anything despite the unstable situations they are forced to stay in. Then if they don't want to move and lose their children's spots in daycare, their school position, or for other reasons do not want to be placed in another city's shelter they have no options for a year. There is no recognition of this situation. Any conversations I've had with workers have no resolve as they are locked in.

It excludes my clients. Since they are my job and reason for living here in Springfield, I too feel excluded from the community. In fact since moving here I haven't felt or seen much of a ""Springfield Community.""

Not make more gardens, nor open up areas for more innovative sustainable construction

Not listened to feedback, defaulted on HUD Fair Housing Conciliation Agreement, promoting segregation with HOME and CDBG funds, ruthlessly and needlessly demolishing historic buildings in minority communities, maintaining a Code enforcement "Goon squad" to promote minority homelessness with false and exaggerated code complaints, promoting reduction in property values in minority areas through incompetent auctions of tax-title property, discriminating against minority and local people property disposition processes.

Is just that is to many things happening in the city and not enough staff to deal with all the issues

Same folks all the time.

Question 9: Please tell us how you think the city could do a better job making it easier for everyone in Springfield to find a good place to live:

A total of 278 survey respondents shared written responses to this question.

The following responses were received for question 9;

"Promote development of entry level-housing in safe neighborhoods and adopt a zero tolerance crime policy. Also stop trying to stifle the city's nightlife. Springfield should be more hospitable to 20-35 year-olds-- it should have better downtown high-rise housing options for young professionals.

Gangbangers and drug dealers should not be allowed to return to Springfield when they're released from jail.

JUST DO WHAT YOU ARE DOING AND WE NEED TO DO WHAT WE ARE DOING AND KEEP WORKING TOGETHER HAS A COMMUNITY

Community Policing

Better management co.

Get rid of management companies

Put the information out there

First make it safer for the kids. Then make it safer for the elderly people. Lower rent. Give second chance to people who have failed in rent in the past.

Reasonable rents jobs

Making monies available for those who have little or no income to pay their utilities

More low income housing and more options for those with CORI issues.

Try and help those w/o resources

Pick up abandoned buildings to make more low income housing

Need more building for low income housing

Need more housing in Springfield

Listen to the people who come to the meetings and give equal opportunities to everyone

Hire more people

Don't know

Clean up the streets give BAD CORI participants a second chance

Fixing old apartments

Give more people their SSI on income

Working on shelter clients-and creating jobs.

Part time job

Make new properties and buildings

Remodel empty bldg.

Start with the homeless real apartments with respectful management. Shelters and pseudo-transitional programs only. Maintain the problem of institutional bias

If people try to just get out and look for work and not wait for the job to come to them and then maybe people will have work

Affordable for all Low income Ages

Use HOME funds for tenant based vouchers, two months sec deposit, rent to own opportunity

Use HOME funds for tenant based vouchers, two months sec deposit, rent to own opportunity

I feel that there are a many things the city could be doing to make Springfield a better place to live. The first thing on my mind is abandoned apartments and rundown buildings by fixing these properties and help make them more affordable. Also I feel that some landlords from big Management companies seem like they do not care about the tenants. I would like to see more police presence in the problematic areas.

More public housing, low income , section 8 and not to go by peoples credit.

More Affordable Housing/More Apartments with things included like Heat, Hot Water, ETC.

Turning vacant properties into rent controlled subsidies whenever possible.

Noted in question #6

They have to do more for the community

They shut have more Police

Offer more low income housing. I am a family of 5 (1 adult, 4 children) I work full time & get no assistance with rent. It is so hard to pay market rent value & the constant risk of eviction puts a strain on emotions in my family.

The City of Springfield should have a housing credo or standard.

Put rules/laws on how landlords can treat people. Making them pay for their own Cori/credit check, they are regular people why should they have access to all this personal info, they should only have housing references and housing court reports, and fines for discrimination. A landlord showed me an apt. with dead roaches and wires hanging out the walls and stated he thought I was used to that. I am minority, but educated and hard working. and realtor and banks allowing equal access to loans and homes

Abandoned building need to either be torn down or fixed up....

Make the mortgage process less daunting and lien on the local lending institutions to actually give loans out that the federal government gave them to give to us to bring back the housing market.

Not foreclose, not make urban renewal into urban ethnic cleansing and pushing poverty further out of sight and mind of privileged people.

Springfield is a good place but the biggest issue I've confront is the discrimination of race

Continue to ensure codes are met so people can have a clean and safe place to live.

Start cleaning the city and have more patrolmen in the neighborhood

A lot of people are on waiting list for sec 8. People just can't afford apts due to the cost of living.

Come up with creative solutions to housing affordability problems instead of just stating "no more subsidized housing"

I believe it would make it easier if Springfield would stop placing people into categories due to their race/income/housing options. They need to give people a chance according not just to their credit but job history, criminal records, referral letters etc... Not everyone with bad credit or Section 8 are not great candidates for better living.

Would like to work more closely with the minorities groups of Burmese, Karen, Karenni, and Nepoli etc.. in this community

Reach people from where they are at, everyone has different issues

Remodel vacant houses and rent them at a reasonable price

Making communities safer,

Build more apt/ homes especially around schools.

Continue to make the above illegal actions above to be publicized and enforced

Safety issues

They need to send their representative to reach the low income people, have one on one to know what and how the city can help to live in a better place.

Not discriminate against persons who are not on section 8 as well as persons who are.

First, by maintaining the properties that people are in with other real estate repair procedures & not boarding up these homes & by fixing up these homes making the city look more presentable & making it an area where a family may want to live.

Make apartment lists or give people who can afford full rent subsidized

More low income units

Better funding.

Act

Give Each individual an equal opportunity

Help more homeless

"Cleaner environment

Lean more toward their incomes not always HAP, etc."

By making affordable housing for everyone.

Be organized, and not be against people for any reason.

Clean up the neighborhoods!!

Giving people the chance to find housing in area around them

Give more funds for Section 8 vouchers

Put more money and housing then we won't have to worry

Get rid of crime and drugs!

No history check

Give more Information about sec 8 Lists Where you are on the List. Too many years waiting on the Section 8 List.

Check apartments are to see if its available & in living condition for families.

Hire better police.

Yes

Stop crime

Yes

Yes

More job housing

MORE education, housing, etc.

Stop putting in Casinos and consider more housing for the homeless

No comment

More info available to all citizens

Lower rents, more jobs

More advertisement

Need jobs, benefits not casinos

My biggest issue is with finding a safe enough place to live. There are many parts of Springfield where I don't feel safe past daylight.

Have more available, affordable, livable apartments for families to comfortably reside in. Double checking on landlords and following through on investigations and/or requests. Listen to the poor more than the rich, the residents more than the landlords, property owners, and investors. Try to move good tenants into the low income neighborhoods, not just anyone so the rent gets paid. Make sure landlords are doing thorough and decently scheduled investigations. Many more but need more time.

Crack down on the ordinances and people who do not keep up their property and destroy the neighborhood.

Cut down on crime; drug neighborhoods; more arrests; more police on the street;

Improve the Section 8 process. It seems like Spanish people get housing before any other minority race.

These projects and apartment buildings draw crime gangs and drugs more community policing to make them safe

Lower the residents on section 8

If they would make it better to find the listings and to make sure they are legitimate ads.

Enforce quality of life issues

Fix up the abandon houses and apartment buildings.

It shouldn't matter what language you speak or the color of your skin. We should equal upon all races.

The city should help citizens who are on the lower end of the income scale by offering financial counseling programs that offer credit repair and money management. Additionally, vacant housing, lots and parks in poor areas, like Gun Square Park should be kept clean and well policed to reduce crime and blight. Please work with local banks to train citizens for homeownership. This might reduce some of the strain on the Housing Authority.

Open up more section 8 for people who really need it, but make them prove they need it.

Making the landlords responsible for their mistakes and make sure that they take care of their properties and the tenant.

More info directly to residents

By not looking at race or whether or not people have children. Everyone would like to live in a nice home.

Have a specific place where landlord can post their apartment available and Make sure that everyone home is up to code.

I think more landlords should have an easier time evicting people not paying rent. Deadbeat renters drive up cost for everyone and drive landlords out of the city.

Affordable housing

Landlords should only request first month and half security, it's very hard for triple rent before move in

Put welfare people to clean the streets and blocks

Knock down all the abandoned buildings and we would have plenty of housing for everyone.

Stop the politics. Catering to a certain base of people because of a large number of them with the chance they will turn out to vote has to stop.

The city needs to enforce noise limits, housing codes, and make the absent land lords accountable for their disgusting properties. All residents, renters included need to be responsible for the property they rent.

Sweep, rake shovel, trash, cars,

I think that the city should knock down the abandoned houses around the city. I'm not suggesting rebuilding the houses, put the land up for sale and let people build on the land. It would add to property values.

Put more money into culture/ Visual and Performing Arts. Put more money into education. Make the city attractive. And on that note. GET RID OF ALL THE FILTHY BARS AND STRIP CLUBS!!!!!!!!!! When a city is desirable, people will do what they have to live in it.

I think that landlords of properties really need to be present so that neighborhoods are safe and properties are taken care of.

"Make the neighborhoods safer for all people. More patrols. Demolish unsafe houses. Build new homes in those lots

Bring new factories or job opportunities to the city.."

"Make the neighborhoods safer for all people. More patrols. Demolish unsafe houses. Build new homes in those lots

Bring new factories or job opportunities to the city.."

I live in Chicopee and I do plan to move.

I don't think it is the job of the city to make it easier for people. People need to learn to work hard for the things they want or need.

By making the city more safe.

NO CASINO!

More apartment complexes and multilevel ones

By addressing the gang problems. By providing jobs to the unemployed. And, by insisting that city workers live in the city. It would also help if the city would consider a program to assist new teachers with finding affordable housing.

Build better housing units and options. Build them everywhere in the city. Actually implement ALL the recommendations of the Rebuild Springfield Plan. Create a more transparent process, so people can be a part of shaping our city's future. Stop being so defensive, it makes it hard to have a conversation about the city in a meaningful way.

If the politicians would listen

More financing

More affordable plans for upgrades for energy efficiency

Have more accessible housing as a standard especially for new developments.

More supportive housing options for low income, advertise community events better, reach the younger generation to feel more passionate about staying in the city.

"Less administrators in schools and higher more instructors/teachers. Teaching students of the city will allow better decisions to be made by future generations of Springfield.

I could further discuss this in a formal way and would very like my voice heard.

Education of the citizens go up, new industry can be born, more jobs result and gang related issues might just possibly go down.

Stop wasting taxpayer money - have several ways that this can be accomplished. The leasing of the Federal building is a simple example."

The city should fixed up all the abandoned buildings to provide housing.

Make the neighborhoods more safe for families. Making sure that everyone do their part for the up keep of their properties rather landlords or owners and tenants.

Clean up, get rid of or utilize vacant buildings/properties. And there are people who are not trying to use the system who really need assistance. Make more opportunities for those people.

I think neighborhoods need to be safer so that everyone has the opportunity to feel safe where they live.

I think it is not a question of how to make it easier, it is the concern that the landlords and home owners who will be renting are following all rules and regulations as well as the renters. Are the renters at the correct address, do they pay their taxes, do they give the proper info. When they are applying for rent???

Are they legal to be here to begin with?? Many landlords I think want to rent, but maybe these matters come up and they feel it will not be or become a good situation for all. I live in a great neighborhood in the City, however, if a house in my neighborhood is rented to a family by a landlord who does not get the truth and proper info. from that renter...where does that lead my beautiful, peaceful, good neighborhood. I have seen rented homes where one family moves in with that lease, and before you know it, another family moves in, and yet another...you can tell by all the cars that are continued to be parked in the driveways. This is a lot to consider, please do!!

Not sure. Sometimes fixing up the area that people don't want to be and making it safe. Teaching folk about the American dream and how to keep it. You have to model what you want and use the people you have to help them understand.

That would be hard because there is always going to be someone to oppose.

Everything is cater to the DTA or domestic violence which is great but for a single mother of three children it is difficult to provide and get no help although, I work 40+ hour weeks just to barely make ends meet. I don't qualify for any help right at this moment unless; somehow I lost my job and became homeless. Isn't the point to get on our feet and support our families. My tax dollars go to help everyone else but me and my children.

"Tear down the dilapidated buildings or fine owners for leaving them in deplorable condition.

Provide more low-incoming housing near schools to make it easier for families to participate in their children's education."

Better education

Stop shoving section 8 families and homeless in one area which causes problems. These landlords only care about money because most of them live out of town or out of the area. Every time you hear something on TV about fixing up the city you never hear Winchester Square only the South End Forest Park or the North End (some areas)

Tear down all abandoned houses, Freeze landlords from owning any rental properties again. Use Habitat and the kids at Putnam to build affordable housing. Some areas of the city are starting to look better.

It's pretty expensive to live here. Maybe a rent reduction if you stay in the city for a period of time

NO ONE IN THEIR RIGHT MIND WOULD WANT TO LIVE IN THIS CITY UNLESS THEY WERE FORCED TO.IT WAS ONCE BEST DESCRIBED AS NOTHING BUT AN ORPHAN BEDROOM TOWN.

"1.Old. Unused buildings to be remodeled/renovated and put to use.

2. Incentives for college graduates to buy in this city and not only live but work.

3. Assistance and lower cost/ APR to buyer of these old and unused building with a plan to improve city. Lower credit score approval for these types of plans"

Stop wasting tax dollars on foolish stuff.

Hold landlords more accountable for their properties. Also, offer incentives to city employees to live in the city. We need more tax-paying residents buying and living in the City of Homes whom are also drawing a paycheck from the city. I work in the city and chose to purchase a home in the city; however, as more and more homes are flipped and rented by absentee landlords thus decreasing property values as well as everything else, it pains me to know that if the conditions don't change in this city that my family and I will have no choice but to sell and move out of the city.

The city has too many properties that are an eyesore. Not enough is done to make sure that our city is beautiful.

Pay the Clerks a little more money to be able to survive and make ends meet.

Clean up some of the dead trees that were left as a result of the June 1st tornado.

I come from a small town and am continually appalled at the amount of trash strewn everywhere. I think it would help Springfield considerably if it were cleaned up on a regular basis. I would volunteer for this activity in my neighborhood.

Fight crime

I do think Code Enforcement should be stepped up. There's a lot of subletting and multi-family squatting going on all over the city. Let's move these people to their own places.

I have not personally had any issues finding housing, and have been very happy with my experience living in Springfield, despite the fact that my landlord lives in GA. I have lived in the same house for the last 7 years.

Advertise where parents would see information. Canvass and get community input on issues. Let the residence know how they can get connected, follow through on issues.

Stop offering section 8 to people that don't do anything. I have nothing to say against this survey because I never been involved in housing discrimination.

Make the city safer.

Public safety and schools

Hosting community conversations, and having those conversations displayed on a city-wide calendar.

As an educator, there was an idea once presented to me about having a "Teacher's Village" idea, a concept done in other larger urban centers, that provides city educators with reasonably priced homes within the city, adding to additional investment of educators in the city. Many teachers I know live outside Springfield because the cost of living is much more within their budgeted means.

Focus on crime reduction, which will make more neighborhoods safe for families. And in focusing on crime reduction, increase job accessibility, which will reduce crime, which will make neighborhoods more accessible.

Get rid of the trash fee. When I have called the cops about bothersome neighbors they didn't really care.

Enforce laws

Mark areas more presentable and clean up drug and gang activity

More of a visible police presence in ALL areas of the city.....More advertisement (Forest Park, etc.)...

Invest in your schools. Remove the criminals. Tear down abandoned houses and erect new ones. Maintain city streets and parks.

The city only can take the run down properties and their owners to court and get rid of them. The PEOPLE have to find their own good place to live by working, keeping up their properties, and not asking for handouts. Housing issues exist in the city in the areas where people do not work, children who drop out of school, and people who spend their days looking for handouts. The city does too much for everyone.

Housing issues start with the people.

Our city needs to become a community. We need to start in schools and neighborhoods, creating relationships with neighbors and law enforcement so that we can keep our city safe together. The citizens here feel no responsibility for the place where they live because they feel unsafe and alone. The police officers are jaded by the crime in this city, and pass judgment on all of its citizens. They need to be aware that they are not judge in jury, just the enforcement. They should be talking to the people, and creating relationships. This will make their jobs easier!

Unfamiliar with current plan

Make ALL neighborhoods safe. It is clear in Springfield which neighborhoods are neglected by the city in cleaning, care, and safety.

As a home owner, I found it difficult to sell my home in Forest Park (01108) and had to rent it out for a year. This issue is related to the safety in the neighborhood. There is a perception that certain areas are

unsafe & there needs to be more work to make sure that every area in Springfield is safe. We need to have no tolerance on crime & make it as uncomfortable as possible for criminals to make a living in Springfield. I think it is very difficult for the city to keep up with the demand of tenants and their families looking for housing in Springfield. I also believe that tenants are moving from one apartment to another at a very rapid rate which also clouds the statistics.

Enforce existing laws.

Make sure neighborhood are safe, the poorest people live in the worst neighborhoods. Lack of info in native language other than Spanish- Khmer, Nepali, etc., Refugee agencies dump people in poor housing

Enforce infractions if a law or code violation...that sends a message to those who are breaking codes or laws and sends a message that we don't do that here

Enforce infractions if a law or code violation...that sends a message to those who are breaking codes or laws and sends a message that we don't do that here

Keep on doing what you're doing

Keep obtaining information and modifying events as needed going forward

Create more affordable housing and put an end to redlining from banks.

Housing Programs (i.e. NEFWC & HAP), should provide constant orientations and workshops that are informative but more importantly provide tangible resources/direction to the public.

Start cracking down on people illegally over-occupying apartments!...then the market rents would adjust themselves and not be so directly related to the voucher minimums!!!!

Stop section 8 housing and when a multifamily either gets boarded up or burned down- they should tear it down and make it a single family home and no more housing projects.

Clean up and rebuild damaged apartment buildings

Rents are too high now and days. People, especially families with children have a hard time finding a good place to live. In the urban neighborhoods the rent is high but somehow affordable but the quality of the housing is cheap. You have to put up with rodents, lead, heating issues, cockroaches, also concerns for the safety of your family depending on what neighborhood you're in. In the suburban neighborhoods the rents are ridiculously high you can't afford the housing, so you're stuck in the "ghetto".

Make more home ownership programs available, especially with down-payment assistance. Homes in Springfield are affordable, but people have trouble saving the down payment. People who own their own homes are more connected to the community.

Do sting operations (testing) to learn which realtors and landlords are helping whites at the expense of people of color or excluding deserving families

Stop over concentrating poverty and allowing more section 8 housing in the City. Its already saturated. People who live here on Section 8 who don't have a decent place to live can move to another community for free

"Reduce crime. Ticket dog owners who have unlicensed dogs. Continue to crack down on absentee landlords and neglected properties.

Improve public transportation throughout the city."

Honestly, I don't know that the city can do anything more, given the amount of low income housing that already exists.

Less ghetto, there are some beautiful places to live but I would NEVER live there for fear of my own safety.

How on earth can you make it any easier than it already is. Try making it easier for people who work and pay taxes and aren't on the public dole!!!!

Enforce the vacant and foreclosed property ordinance, continue cracking down of absentee landlords

Mandatory inspections to all apartments for rent! Just like fire men would do for smoke alarms.

Get rid of the abandoned houses. I live on one of the best streets in Springfield/Brianna Lane and there is a house on the end of the street that was foreclosed on and then hit by the tornado and nothing has been done. We actually had a neighbor mowing the lawn at one point. That is not acceptable...If the bank owns it they need to do something about it. I think the city should get involved to make sure the bank does what is necessary.

Lower taxes

Get everyone a job

You guys should use all those abandoned buildings and places and rebuild new apartment complexes and/or houses instead of just having them there not being used.

Are there any incentives for landlords to fix their places to attract more renters? Are there any incentives for renters to live in a particular place - tax wise? How about if you live in the City and work in the City, you get a 1/2 percent tax break?

I like the automatic calls I get from the police department notifying me when they have community meetings in my sector of the city, something like this may be a good communication tool for other issues in specific sections of the city.

Do something about the scumbag landlords.

Enhance City Services

Cannot

Involve the residents more. Do more outreach.

STOP THE CORRUPTION, GIVE THE JOBS TO QUALIFIED LOCAL BUILDERS< HOLD LANDLORDS AND BANKS ACCOUNTABLE FOR SHADY DEALINGS AND PROVIDE ACCESS TO RESOURCES...resources are there but people need access and need a little more leniency in QUALIFYING. Not everyone is unemployed because they want to be.

Coordination of consolidated plan, action plans, and services Expand Office of Housing more contact and service for public

First clean and make sure the damaged homes are renovated. On my street alone there are 4 homes either burned or abandoned. City or owners have not paid attention to them. When new property is built "like" homes should be built.

Keep places up. Come down harder on landlords, be more involved, have the City/State have apartments that you run for Cheap and are clean up to date and in good areas then Spfld would be a better city and cleaner.

Low income homes

Fixing up all the abandoned buildings to make more affordable housing.

One up all the abandon buildings. Give all the Homeless people a place to live.

Be more involved with the real people in the community.

Audit case workers

I didn't understand the question

Cheaper housing

Provide what is needed, in areas that based-offender can.

By not doing things to only benefit a Chosen few. For developers and private Non Profit Agents to make money off of low Income residents that need Housing.

MORE LOW income Apartments. 30% of your income

To have an emergency referral service, that actually blends into a state program like RAFT.

Work with homeowners; rental property owners.

Acting on Springfield resident need for housing, I know they hear us from Springfield no one leaves

Treat every case as an individual concern and follow through with all individuals. Possibly case managers.

Fix empty houses to affordable housing. City to please reduce homelessness-help people get jobs.

They should never turn down families with kids and who are trying to do better in their life do to their past

I think there needs to be people or an organization that governs both the Housing Authority and DTA.

Open up the abandoned houses

Put places out there so people could read or look on-line

Should listen and follow through in what our community want for our future in this City of Springfield

Make areas more safer to live in

"Rebuild old places

Give everyone a fair chance and really concentrate on rebuilding western mass and/or Springfield or surrounding town w/spring/Holyoke/and so on"

Lower prices (rent

Lower prices (rent)

Fixed-rate for people with SSDI

Yes they can do a little better

Help more people get apartments

"There needs to be more housing available,

And if building stronger homes and families is the goal, people shouldn't be made to feel voice-less."

Improve schools in North End and South End and Mason Square--invest in these communities so everyone will want to live in them. Clean up abandoned lots. Enforce property owners obligations to keep property clean. Have the same level of responsiveness in all neighborhoods. Make sure that parks are not locked during the day. Have police presence and responsiveness throughout the city and not just in predominantly white neighborhoods; facilitate a community conversation on racism; launch a city-wide public information and education campaign to combat racism--with billboards and bus posters and TV and radio commercials.

More resources and try to get more affordable housing complexes

Regional education

Give the poor a chance to get in

More tenant/landlord education

Offer more training to landlords and more affordable housing.

Educate landlords and the community

Encourage landlords to overlook statistics

Start by making the landlord delead their apartment. Start fixing up all these abandon apartments and rent them out.

Give us free housing

Affordable housing requires living wage job opportunities and the city's efforts (if any) to attract employers has yet to bear fruit

Make absentee landlords accountable.

Some sort of rent control. I am a single parent, with a single income and 2 children. My income qualifies me for services like Fuel Assistance but I make too much for SNAP, MassHealth, Section 8. In order for me to find a clean and safe 3 bedroom apartment (my children are opposite genders) it takes me almost 3 full weeks of pay to cover my rent.

"Hire people to help people find housing.

Buy up the abandoned homes and fix them up for homeless people or people who need housing.

Let people rent to buy their apartment."

Start helping people

"Have these kind of workshops note: comment made at Listening session on AI

Support the homeless and have classes to help them be self sufficient

Give them jobs and don't discriminate."

Fix more up housing make it affordable come up

Really embrace its diverse population

Marketing to all ethnic/cultural groups and all areas of Springfield

Invest in all these properties that are going into waste, invest in parks and recreation that can be family-oriented and available in the area with security and of good quality and enjoyment.

Enforce building code in a timely manner. Find affordable housing to develop. Look at alternative housing types.

Making housing more affordable. The cost of living in the city is so high it's really hard to do anything

Have more resources for working family to qualify for help

Get rid of section 8 housing. It is not the city's job to make sure rent is cheap; it is to keep a safe, clean environment for its citizens and decent educational opportunities for its children. I don't see Wilbraham or Longmeadow accommodating anyone financially.

Start enforcing all laws, and jail people who constantly break the laws

Press charges and fine landlords breaking the laws

CARE.

"Replace ""City of Homes"" on Springfield Letterhead.

The Springfield Fair Housing Authority has a role in this change."

Make these landlords follow the law and penalize them when they do wrong.

There have to /be/ good places to live. If the city could enforce basic laws it would help. Requiring people to adhere to ordinances would help us all. If people have yards full of trash, that is bad for everyone's health, safety and property values. If there are homeless people sleeping in vacant lots, someone needs to move them. If there are junked and abandoned cars, they need to be towed. Trash, scattered shopping carts, wandering beggars do NOT attract responsible people to want to live in our city. Enforcing the small things will greatly contribute to decreasing the big crime and poor property values. If we call the police we need them to actually give tickets.

More police and neighborhood watches. Less police discrimination of black and Hispanic cultures which happens all the time and more inclusion of said cultures.

More income adjusted housing. Houses included

We are a nation of nations and community based service. Therefore, we need all to be considered.

I think that they could be little more lenient with those who have poor credit. The city is broke, obviously so are its residents..

Mostly we need to approach things as people doing things together, and not as adversaries.

They need to expand their shelters. They need to remove the one year ban if shelter is turned down, and they need to have more information about the housing process available in easy to read terms.

See number 7 and number 5

Listen to feedback, reinstate the HUD Fair Housing Conciliation Agreement, promote balanced housing with HOME and CDBG funds, work to restore historic buildings in minority areas and re-erect those lost due to irresponsible actions, eliminate a Code enforcement as a CD program and restore housing rehab to its former prominence, end auctions of derelict properties and sell properties after they have been restored to functionality by a community-based receiver, prioritize capacity-building for local people and prioritize providing employment and ownership opportunities to members of minority groups and local people in general.

Leave to private sector/competition

By building more affordable housing

I think the city is trying but lacks funding to do more single living apartments and more affordable first time home buyers.

Probably more funding so people can be honest and not overuse the funding from other people that really need help.

Register of landlords with special attention to absentee Landlords. Rent Control.

Question 10: Please tell us your zip code so we can better understand where housing issues exist.

A total of 488 survey respondents answered this question.

Answer Options	Response Percent	Response Count
01101	1.6%	8
01103	0.0%	0
01104	9.2%	45
01105	14.1%	69
01107	5.9%	29
01108	17.8%	87
01109	20.3%	99
01111	0.0%	0
01118	13.7%	67
01119	6.8%	33
01128	2.5%	12
01129	4.1%	20
01138	0.0%	0
01144	0.0%	0
01152	0.6%	3
01199	0.0%	0

LISTENING SESSIONS SUMMARIES

Listening Session: HAP Housing Consumers

March 27, 2013

Property owners on Cottage Street in the Mason Square neighborhood are not keeping up properties.

There's a lack of communication between landlords and tenants.

Property values are declining and properties in the city are run-down and not maintained. Many homes in Mason Square are abandoned, foreclosed and trashed. Many are boarded up and fenced.

Landlords don't want to take Section 8. When apartment was needed, called 50 landlords before one called her back.

It's hard when you wait for so long for a voucher; client waited on list for 15 years, then no one will rent you an apartment.

Listening Session: HAP Housing Consumers

April 2, 2013

Landlords need to be educated. They give you a lease and then after they create extra rules and stipulations that go along with it. Landlords don't give official or proper notice when they want to evict a tenant. Extra charges imposed by the landlord after the lease is signed. Many residents are harassed by their landlords.

Landlords need to learn how to properly communicate with tenants.

Landlords automatically reject you when they find out you have Section 8.

When you have Section 8 and do find an apartment, you fear losing the housing and the voucher so you stay in places and deal with things that are not appropriate. Fear of retaliation.

Some landlords won't rent to you if you are a full time student.

Some landlords won't make repairs to your unit because you have Section 8.

Maintenance issues in general.

Bad tenants are allowed to stay in the complex because they pay cash rent.

Tenants need education on their housing rights. Tenants are taken advantage of when they don't know their rights.

Listening Session: Caring Health Center

April 17, 2013

The city needs to know that landlords are charging for rental applications, people have to pay just to apply and are not necessarily going to get housing.

Homeless shelter is not accommodating for people with disabilities.

Homeless shelter uses plastic dishes and residents are concerned about health because you can't sanitize plastic. Response: you can't have china in a homeless shelter because sometime people go off and it's not safe. Man in homeless shelter would like his own room. He has a companion dog and everyone wants to pet his dog. Bill Miller doesn't care about anyone or anything.

Need to pay more people to work with people to help them get the help they need. Need to pay more people to help people find places to live. People need more help and there are people who need jobs, so the city should pay them to help. Gov't should open up and say we have this and let's go onto this community and help them. It's like they don't see us and they don't help us.

How many houses are in foreclosure? The city makes the money back. Why don't they buy the houses and put people in them. In other countries the government gives unused land to poor people to build a house on.

Homeless people- I've been homeless myself. People don't speak up. There should be more people here. 6 members of the public here. The city doesn't listen anyway, no one listens, so there's no point in participating in meetings or surveys.

There are things at the shelter that you can utilize, but people have to utilize them. People of color, poor people, us, have to stick with it. Make job training mandatory part of homeless shelters. Put the work places in the homeless shelters.

COC meeting tomorrow 10am at 1600 East Columbus Ave.

East African experience Somali, Eritrean- everyone who tries to help us is for the government. Problem of part time workers so can't access them all the time. Advocacy organization tries to find apartment for Africans- ask for 3 months' rent and do not open a bank account. Boston and Worcester are better than here. People who cannot read and write English so people are removed from the section 8 list because they do not read letters. Mohammed is discriminated against last name doesn't match. Americans get the best jobs, but the real jobs where you're sweating etc. are the Mexicans etc. and they don't get any help because they are immigrants.

I can pay my rent but I don't have three months. If you can't sustain the rent they kick you out.

How's can you house people in a hotel who are homeless and not get them in housing. It's a cycle and you get stuck. Once you put people in a concentrated box then it's crazy.

The money is there and the housing is there but it's hard to get it. I get a check and my son gets a check but I have to give it back (to Gov't). Gov't gives just enough money that you can't progress – just tread water

and not improve. I want a chance, let me buy a bike or something so I don't have to ride the bus Springfield has a lot of empty houses, put people in them.

We went to the shelter and got all the people with skills and asked the city and tried to buy buildings and tried to do something to buy abandoned houses but it didn't work. In Africa we have fixed rents for various sized apartments. Issue of discrimination against a Somali family. He will provide the letter.

Can't rent because of CORI or bad credit.

Everyone has heard of MCAD but not MA Fair Housing Center. There are places out there that will take complaints. I walked into MCAD and everyone there is in their own world; they love their shoes and their clothes and they don't do anything. I filed a complaint with MCAD and they didn't do anything because I didn't hire a lawyer.

I am blessed because I have an apartment and I only have to pay one month rent at a time and it's a Spanish woman and its working.

All about racism, I have lived all that and we have to overcome that. It's been there since day one and it's never going to stop. The community has to put its efforts in too.

Experience in housing place where a maintenance person sexually harassed her, and so the maintenance person made up a story about how her daughter who was playing in the dirt under a tree was damaging the tree, and tried to kick her out. They try to evict people.

They enter illegally into your house, they don't give notice, and they always say they did. The housing court is very good; they give you time and it's always been very good. There's tenants' rights and there's landlord rights, and that information is all around.

I had an issue with a landlord trying to evict me who took me to court saying I owed back rent, and the court affirmed I didn't owe money and the landlord made a complaint to a credit company and now she has a mark on her credit.

MGM should put some money into housing for poor people and homeless people. We are the city of homes, and we need the casino company to have a focus on homes for low income people. It's probably going to be poor people who are going to go to the casinos so you got to make sure the casinos help poor people.

Limitations of PVTA – if bus dependent can't attend evening meetings because bus doesn't go back home after. Also, bus doesn't accommodate the size of his wheelchair.

**Phone Conversation: Michaelann Bewsee, Arise for Social Justice
April 17, 2013**

Although the City is working on a fair housing document, it is important that they are mindful of issues around affordable housing in the city, most significantly a lack of rental housing for the city's poorest residents. 23% of city's population is below the poverty level. Many of the clients they see have insufficient income to rent *any* housing. There is no mention of affordable housing in draft AI document.

The city's poorest residents are not reading the paper or utilizing the internet for information on opportunities for public meetings/events hosted by the city or other organizations. Important for the city/other organizations to utilize printed fliers to reach these residents.

Concerns that the city lost more rental housing due to the tornado than they are reporting.

The city want to create housing for the people they *want* to live here, not the people who *do* live here.

**Listening Session: HAP Housing Staff
April 25, 2013**

Some landlords claim that they don't accept home-base benefits (state emergency assistance program). Home-base participants often don't know their rights and don't know that they are being discriminated against. In most cases this is deliberate discrimination and not due to landlords not knowing any better. One issue is that a lot of the really poor families aren't sustainable to house because it is a maximum \$4,000 benefit per year. Home Base program going through major changes. August will be a transition point.

Some landlords make excuses about why they can't rent their apartment or why their apartment wouldn't be a good fit for a prospective tenant including: "there are elderly residents and your kids will be too loud," "there may be lead paint," "your water bill might be high."

While some landlords discriminate against section 8 voucher holders, others state that they will only take Section 8 holders.

Many landlords discriminate based on income of prospective tenant. Many landlords require 3 times the income, which makes it difficult. At the same time, landlords have the right to deny housing to a household who will be spending more than 30% of their income on housing because anything over 30% means the household is housing-cost burdened.

It is a tough situation for landlords because there are many people who are very, very poor. Many good landlords.

Better the neighborhood, the more discrimination. East Forest Park, Upper Forest Park, Sixteen Acres were cited as examples. Also communities outside of Springfield also heavily discriminated against low-income tenants.

Typically, the units that are being advertised very openly don't discriminate. These are often the worst units though. It's the units that get advertised by word of mouth or by other means where a lot of the rental discrimination is apparent. Go on Craig's list. Blatant discrimination there.

Low-income households cannot get into Stockbridge Court because rents are too high and CORI checks.

Need for landlord education. Need to rethink how we are reaching these landlords.

Very much a need for more testing of these situations. Fair housing testing. Thinks that MFHC would probably like to do more testing than they are able to do.

More education for a tenant. Low numbers of reported cases are mostly likely because clients don't know their rights. They don't report when they do know because they are afraid that they won't get rented to in the future.

Some landlords are keeping people's security deposit. Tenants get kicked out and are scared.

Posters on buses may be a way to spread the word to educate tenants.

Out of town landlord issues. Slum lords. These landlords often do not take care of these properties and results in deteriorating conditions of the unit and for the tenant. Since the tenant is more likely to be a minority, this is discrimination. Recommends City playing closer attention to who is buying these properties.

HAP people don't think that the condemnation process in Springfield is bad.

Discrimination at City Hall. Certain people get paid attention to fast. People from Forest Park get paid attention to, not Mason square

Broad educational campaign in a variety of languages. Russian, Spanish, Cambodian, Vietnamese, Italian, to name a few. The City and/or the state should be funding translation materials. Very sad that there are people who are scared to leave their neighborhoods. Need for more educational materials in a variety of languages.

Isn't enough quality low-income housing that is available in the region, not just the city.

Corner of Oakland and Orange Street. Classic example of abandoned apartment building that could be rehabbed. Question is rehab for who?

Problem is that the City's mayors only concentrate in one area. Sarno's sole focus has been the South End. The Mayor and his team should be distributing funding more equitably. Plenty of abandoned buildings in other areas of the City.

Idea: offer more tax incentives and tax credits to get these vacant buildings up and going.

Need for moderate income housing. HAP staff sees a need for moderate income apartments. Working poor / middle class needs housing.

Since tornado, rents are climbing in City.

Regional Opportunity Counseling Program—successful with getting some families out –early 1990s program, lasted five years before funding ran out—Found that most families wanted to stay in the lower opportunity areas because networks were there and there was a reliance on public transportation. Did not see ripple effect with friends recommending moving to these higher opportunity area. However, there were some successes and with other efforts this could be a successful program again. HAP staff thinks this should be reinstated.

Discrimination experienced living in South Hadley by HAP staff member.

As soon as you cross into East Longmeadow, you get noticed by the police community if a minority.

City should invest in more police officers to make people feel safe. Maybe people would feel safer staying in their neighborhood and not flee the City.

Indian Orchard has been known as being unwelcoming to minorities. We should be bringing opportunity into the city's neighborhoods as opposed to relocating people from these neighborhoods.

Why isn't the city working harder to make the North End more attractive to doctors, nurses?

Bring job development and business development into the low-opportunity areas

**Listening Session: Hosted by MA Fair Housing Center
May 8, 2013**

Question of how public comments were solicited by city. Suggestions on how to better reach people facing housing obstacles including hosting meetings at housing authority properties and posting notices of meetings/outreach opportunities at public housing sites. Post at housing court, MassHousing sites, HAPhousing and privately run subsidized units.

MFHC, Citing Dissimilarity Index used in draft report, high rates of residential segregation in MSA for Hispanic/white and for African American/white segregation. Huge overriding concern that needs to be addressed in city and region.

Missing leadership to address this problem – need for executive level leadership in the city. Better coordinate fair housing organizations and City Hall.

The Springfield housing authority, etc. should provide mobility counseling to Section 8 voucher holders to encourage movement to higher opportunity areas. Mapping that was done by PVPC shows that Section 8 voucher holders are clustered in Springfield. Mobility is an important part Housing authorities that administer Section 8 program. Only 1% of Springfield Section 8 voucher holders live outside city.

Mass Development contributes to segregation and puts its money into developing for the upper 20% and these comfortable communities that are using Mass Development are fostering and subsidizing comfortable living in Northampton and Amherst. Developers bragging about NYC people buying second homes developed by Mass Development!

Affordability definition is so skewed that it's not wage earners. When you are re-certifying for Section 8 the agency is obligated to inform people that they cannot be discriminated against. Need more money for education on people's rights and responsibilities. HAP and housing authority need to educate people and also need to fulfill their obligation to enforcement. Need to teach clients what to do if they are discriminated against.

Stavros, Not very many units that are accessible for people who need mobility aid. Have to move further outside of city for accessible units. Limited funding and support to make housing accessible. There needs to be more money to retrofit housing for people who need assistance.

There is also discrimination based on race HAP and MFHC and MCAD all have responsibility to educate people about their rights. The city could do more to reach out to the small landlords to educate them. Some discrimination is intentional and some is out of ignorance. Absentee landlords from eastern MA and out of state are a big issue. Assistance with training need to expand education with city assistance/partnership.

There's also a lot of empty houses all over the city and those should be fixed up, corrected and made available to people

Habitat for Humanity, a house was built for a family on Quincy Street and now they are not comfortable in their new home because of empty houses and lots in the neighborhood and crime. On the corner of Quincy in broad daylight people hanging out and doing drugs. Empty house next door looks like prostitutes hanging out. Quincy and Orleans police never come, no street lighting complaints for two years. Homeowners put a camera on their house and don't let their children play outside. Not feeling comfortable at all. City lot nearby that is abandoned contributes to the problem.

Question was raised asking if the city was pursuing litigation against banks who participated in predatory lending scams and redlining. City should collaborate on actions against banks – foreclosed properties.

Lead paint is a big problem.

Educating and disseminating info to landlords and also to educate board of health workers to spread the word about fair housing. Health department workers need to be educated/trained in general. Suggestion that certain city Health Inspectors are being paid off by landlords.

Question: Why is Habitat for Humanity building homes in unsafe areas. Answer: Some lots are donated by the city. Homeowners are being proactive to reach out to neighbors. City gave habitat the lot and it's in a crummy neighborhood. Suggestion-try using the media, eyewitness channel 3 news. Street was bad, then it got better, and now it's bad again. Habitat aims to develop in clusters, but they provide fences, which is a big problem. Hope that eventually new houses will take care of problem.

92.7% increase in family poverty in Upper Hill. Explore why/how did these changes happen and why other neighborhoods were more successful during this time period. Apply recommendations to the neighborhoods that are not improving. Living wage campaign.

NYC green market - replicate this success try to expand farmers markets. Mason Square market is a good start but needs to be expanded. City should partner with food bank to expand farmers markets. Try to find growers who will sell for less and accept EBT cards. Holyoke fourth Friday community groups at farmers market.

In coordination with police department, resume TBOS (take back our streets) initiative. Copy Holyoke they are doing something right, all the crime has been pushed to Springfield from Holyoke. Now crime needs to be pushed to Hartford.

If Springfield hired a position focused on fair housing needs to be both broad and specific and develop policies on education of board of health, landlords, poverty issues, child care, etc. Attack issues holding people back.

Need youth job program for the summer because there is a huge gang problem.

Understanding subsidies-if I go out and get a job, my rent goes up. There is a disincentive to get jobs. Have to reverse people's thinking to make jobs more appealing.

Improve networking among advocates. Who should you call and how long are the waiting lists.

Section 8 first time home buyers program needs to be promoted. People don't know.

If your credit is not good - how to fix your credit. Financial literacy.

Family resource manual? Who made it? City needs one. Have a city housing fair at mass mutual.

Replicate the tornado resource fair. Replicate the pancake breakfast with resources for residents.

Boston program in exchange for your housing voucher you receive 5 years of services. Innovative programs to get off of Section 8. Financial literacy, credit counseling, etc. 5 years of intensive counseling.

Housing authorities and subsidized properties update their waiting list records every so often. It is supposed to be yearly, which doesn't seem to be happening, can this be enforced?

Springfield Neighborhood Housing services and Habitat offer mortgages based on non-traditional credit. Eventually the Habitat families transition to conventional mortgages. Need expanded resources for nontraditional mortgages.

Credit tightening an issue.

People who are victims of predatory lending are twice victims. First they lose their homes, then they can't rent another because of bad credit. Barrier that should be addressed by the city.

Miss-match: Homeless population and vacant houses; ask the city to explore ways to renovate vacant properties and make them available as affordable and accessible housing. Especially for those with mobility needs. Not just residents, what if you have friends and family in wheel chair?

Segregating people because properties are not accessible. It takes years to find an accessible apartment. Universal design needs to be integrated throughout the city.

Could some of the communities that have little to no interest in affordable housing somehow pay for affordability in Springfield? There is a role to be played by surrounding communities. Communities could lose CDBG funds if they don't accept affordable housing.

Banks should use CRA credits do an assessment of CRA in region.

More funding to MA Fair Housing to follow up on fair housing complaints, impact litigations, ADA compliance and other issues. Housing discrimination is still an issue. Very hard to document discrimination based on race. When there is a case, they don't proceed with a complaint. Need to file more complaints. Testing may be harder now, but it's still worth it.

People are discriminated against based on bad CORI. Recent CORI reform, still fair housing issue. Need education about what landlords can and can't do. Advocacy orgs have an obligation to push for change a disparate impact case theory. There are a lot of fundamentals problems/policies in place. CORI is a de facto discriminatory practice.

Sheriff Ashe is a great resource. Replicate their responsiveness around the city. AISS (After Incarceration Support Services). Successful thing about Sheriff Ashe is that it is one on one counseling. Model needs to be replicated.

Absence of housings search agencies. No service available. All holders of section 8 vouchers should have case managers.

Is there any adult social services? Stavros deals for people with a disability.

Is there a list of all city services available? Dial 311 in city of Springfield. Community Action is developing a database of providers. Springfield Partners has a booklet.

Deconcentrating poverty, Community Builders has a program to centralize all the disparate subsidized units available with a single application so applicants don't need to travel from place to place. Inter-regional application system need to be developed, impossible right now. Universal Section 8 application does go to 85 different communities in MA. Issue is getting to the privately owned subsidized housing options. Requiring persons to apply in person is discriminatory, you should be able to apply on line.

Education of realtors and city council and boards. Visitability policies. Stavros could educate city councils on universal design and visitability.

Limited English proficiency is also a problem. Lack of access because of hearing and vision impairments as well. City should have a language access plan. Residents should know of right to request interpreters. Court documents and housing authority should have docs in Spanish and other languages.

Landlords ignore reasonable accommodation request.

MCAD is hideously backed up, lack of legal services. Federal housing courses must be resolved within 100 days If not resolved in 100 days HUD acts.

Victim witness advocate needed for housings discrimination. People aren't sure who to call. Legal services are backed up and have only a narrow focus. Large lack of legal advocacy on accessibility issues. Fund a priority spot for people with disabilities because accessibility housing is limited. Not considered a priority unless you are in a shelter.

Rhode Island created a new protected category, including homeless people as a protected class. City of Springfield could do the same. Case study of victim of domestic violence. Face a lot of discrimination, targeted for eviction because of violence against them. Women stay with abuser due to lack of housing choice/support.

PUBLIC HEARINGS

City of Springfield: 1st Public Hearing on Draft Analysis of Impediments to Fair Housing April 23, 2013

David Gaby - Open Housing of Western Mass and resident of McKnight neighborhood. *Analysis of Impediments to Fair Housing*: Mr. Gaby noted that the Analysis of Impediments to Fair Housing: The draft plan includes a lot of recitation of statistics/facts, but lacks analysis of the facts. He believes that the impediments identified are primarily things that are not under the control of the City. Mr. Gaby stated that in n 1993, a fair housing lawsuit was brought against the city, due to the placement of too much affordable

housing in some neighborhoods, which has led to the concentration of people of color. Mr. Gaby indicated that he believes that the City deliberately creates segregation through placement of public subsidized housing. Mr. Gaby stated that the City has contributed to disinvestment of neighborhoods; that the City's actions have caused disinvestment in neighborhoods. Mr. Gaby stated that the AI should address this problem.

Michaelann Bewsee, Arise Ms. Bewsee stated that she can't find the City's plans in order to be able to review them. Ms. Bewsee expressed concern that plan have been well-developed prior to having listening sessions or taking public comments.

Ms. Bewsee said that the City has a real antipathy toward rental housing, despite the fact that the City has a high level of homeownership (50%) compared to other similar cities. She noted that the City lost housing in the 2011 tornado and resulting housing demolition. Ms. Bewsee notes that rental housing includes a disproportionate share of people with disabilities, the elderly, and other protected classes, so these people are impacted by a lack of rental housing. Rental housing leads to more diversity in neighborhoods.

Ms. Bewsee believes that the City must look at the role of speculators in buying single-family houses.

Ms. Bewsee notes that the plan provides information regarding the region, but stated that this is the city's plan, not the region's plan. She noted that some neighborhoods are 84% or 71% white, and stated that the City should ensure that it is racially diverse in every neighborhood.

Ms. Bewsee recommends that the City support homeownership for lower-income people through limited equity coops and land trusts. Ms. Bewsee stated that the City should be giving more assistance for people who owe taxes to preserve their housing, instead of foreclosing on it for nonpayment of taxes.

Mike Gillian, Union carpenter, rebuilding homes, homeowner

Mr. Gillian stated that he has owned two homes that he has lost through code enforcement action and receiverships, which he believes was undertaken to defraud him from his homes. Mr. Gillian stated that there needs to be more information in the community regarding homeowner repair programs, and that the City should provide assistance to owners to repair homes rather than having receivers coming in and taking over houses. Mr. Gillian referred to a case in which someone who was not authorized to be a receiver was appointed. He said that he was locked out of his house by a receiver.

Mr. Gillian stated that he agrees with Michaelann Bewsee that the City is chasing away minority homeowners.

John Morris, Arise

Mr. Morris stated that distribution of surveys only via the web is likely to miss many people who do not have computer access. He recommended the use of paper surveys. [The consultant who is handling the survey, Erica Johnson from the Pioneer Valley Planning Commission, indicated that she had paper surveys at the meeting and was willing to distribute them.]

Susan Hamilton, MLK Family Services, Youth Director

Ms. Hamilton indicated that she believes that safety in the neighborhoods is a huge issue and needs improvement. She said that quality of life issues are not under control, making it unsafe for residents.

Ms. Hamilton said that her mother almost lost her home in foreclosure. Ms. Hamilton advocated for improvement of neighborhood organizations to serve people in order for them to be more financially stable.

Ms. Hamilton stated that she believes that neighborhood organizations and residents have a role in improving the community, and it should not all be pushed onto the city. MLK Family Services has many groups that work with the community.

Ms. Hamilton indicated that the community needs more assistance than just the physical structure of houses. Other services that are needed are: Employment/Education; Public Safety; Youth Services. Ms. Hamilton noted the work that is being done by the Mason Square Drug Free Coalition.

Meris Berquist, Mass Fair Housing

Ms. Berquist noted that she received the draft Analysis of Impediments to Fair Housing on April 16, and that her comments at the time of the public hearing are preliminary. Ms. Berquist stated that there needs to be improved outreach regarding the plan. She was concerned that the plan does not address affordable housing. Ms. Berquist stated that the majority of complaints received by the Mass Fair Housing Center are based on discrimination due to disability. She suggested that the planning process include focus groups made up of persons with disabilities, regarding issues they face in accessing housing.

Ms. Berquist stated that there are multiple complaints about the Springfield Housing Authority.

Ms. Berquist stated that the analysis should look at language access/communication access, and communication with and access for people with hearing impairments and visual impairments. Ms. Berquist also recommended that the analysis look more deeply at racial segregation in neighborhoods in Springfield.

Ms. Berquist noted that it is important that this analysis looks at the issue on a regional basis. She stated that there is racial and economic segregation in the region. Ms. Berquist noted that one strategy to address this regional issue is promotion of section 8 housing mobility programs.

Jamie Williamson, Massachusetts Commission Against Discrimination

Ms. Williamson identified a number of issues in the analysis that need attention:

- The LIHTC program does not include the obligation to affirmatively further fair housing; under state allocation guidelines, these projects must be located in heavily impacted areas.
- Regionalization must be part of this conversation. Mass Fair Housing did testing which found high rates of linguistic profiling throughout the region, leading to failure for Hispanic and black housing searchers not getting calls back, presumably due to accent or speech patterns. These populations are unable to access rental housing anywhere in the region except Springfield and Holyoke.
- Enforcement must take place on a regional basis.
- Gender identity/LGBT issues need to be addressed—these are covered under Massachusetts fair housing law.

- The City should make sure that all grant recipients confirm that they will affirmatively further fair housing.
- Surveys regarding fair housing/housing discrimination should be ongoing, so as to continually be identifying issues to be addressed; the Analysis of Impediments to Fair Housing should be a living document.

Ms. Williamson recommends that the plan contain actual numerical goals, and she suggested that the City look to plans done by other cities, both to identify impediments and strategies to address them. She emphasized that improving access to housing depends on a comprehensive regional approach.

Ms. Williamson noted that the revised document is very similar to the AI created five years ago. She stated that the document must address predatory lending.

**Springfield City Council: Planning & Economic Development Committee Meeting
May 21, 2013**

Springfield City Counselor Bud Williams organized a community meeting to discuss findings of the University of Michigan’s ‘dissimilarity index’ study. Also discussed was the City’s current process of updating its Analysis of Impediments to Fair Housing. Approximately 50 people were in attendance.

The following are comments made by Springfield residents in attendance;

The segregation we see in the city is a result of a failure of fair housing policy in city government.

Government policy created segregation. Housing policy has pushed people out of the city. Public housing was built in neighborhoods that couldn’t defend themselves from its development. Residents have been pushing for a balanced housing policy since 1976 lawsuit against city and are still waiting.

The real problem is not too many people of color. City’s diversity is an asset. There is segregation and there are less diverse neighborhoods. Need to start ‘at home’ and address segregation in the city first before addressing it in the greater region.

In the past Springfield ran a successful pre-apprentice program for young people to introduce them to the building trades. This needs to be funded again. New Haven Connecticut has had significant success with a similar program. There is an opportunity to use these skills to rehab the abundant stock of vacant homes in the city. These homes can be refurbished and lived in, not just torn down.

Institutions and systems benefit from the conditions of today. Many programs have gone before all for the purpose of helping poor people. Many grants, proposals and studies – money comes in but where does it go? We need a plan to move forward.

You have to have something before you can share something. So many residents have never had anything and are reluctant to share for fear that someone will take it. Change needs to start with the executive level of government – people with power don’t want to share.

Children have left the city and won’t come back because they can’t earn a living wage. Policies are to blame and the city has a responsibility. Where will our moral example come from? The ‘drive through’ residents of Springfield are catered to. City must adhere to its own laws and policies. The depreciated value of real estate is not a black/white issue but a city issue. What the city does affects people.

Has lived in neighborhoods throughout the city in his life and thinks the city's diversity is a good thing. City can do a better job accommodating residents with disabilities. Springfield's issue is bigger than race. Absentee landlords are a major city issue. Landlords in general need to be educated.

Crime is a big issue in his neighborhood – highlighted recent police shooting on his street. Police don't investigate crime in this neighborhood like they do in other neighborhoods. Police don't assist residents. City doesn't maintain the neighborhood or its park. City ignores any issue above Chestnut Street in the city. Need to stop bending over backwards for MGM and take care of the city's residents.

We don't need a report to know about segregation and disparities in the city. Need to look at the issue in a comprehensive way.

Springfield is a goldmine – many people come to the city, spend their money and then go home. City needs to stop looking for Boston for guidance and look to Hartford and successful programs/policies there.

Segregation in the school system is a major issue. There's not opportunity for integration in the city's schools.

It's all about accountability. There are statutes to prevent segregation and discrimination. Towns surrounding Springfield are not sharing the responsibility. The Mayor needs to call a summit of all local mayors/selectmen to meet and talk about fair housing issues as well as their shared responsibility to the low and moderate income residents and all people in the region. Also need to look at the city and its neighborhoods and determined if their make-up is by choice or discrimination.

City of Springfield: Second Public Hearing on the draft AI June 11, 2013

David Gaby, McKnight Community Development Corporation:

- Some things that have not been changed substantively in the AI-foreclosure crisis is pressing, and a lot of orgs have worked on this, but many homes are still far under water. City still dumps properties through auction program. It is an affront to property owners. Foreclosure crisis is addressed by saying we have formed a committee of some sort but it doesn't say that we are doing anything.
- We talk about opportunity, but section 3 is still violated. Reference to REB and city working with contractors, but can't find any information about that.
- Section called balanced housing-we. Are providing down payments to families to buy houses throughout the city. But no reference to city practice of over concentrating rental housing in certain neighborhoods. All these plans for balanced housing seems like rhetoric.
- The city appears to be promoting another subsidized housing project on Central Street the city through the guise of home ownership. HAP housing and United Way etc. are not our agencies. They are not Springfield.
- In terms of low opportunity neighborhoods and community development target areas, these areas have not been promoted. Buy Springfield Now and website to put a positive spin on Springfield. These initiatives are inappropriate to meet the needs of the neighborhoods. Instead of trying to

obstruct groups that want to market the neighborhoods, we should let them. Plato's Republic, size of 5000 works. Should use that as a size to market. The "I love Springfield campaign" is not efficient, not effective for this reason. Marketing campaign for a city this size will not work. Need to market smaller sub communities.

Martina Carroll, a representative from Stavros:

- Summary states there is an abundance of affordable housing but then it says it's all in run-down neighborhoods. What does affordable housing mean? Just cheap? Or up-to-date?
- Olmsted decision. Stavros helps a lot of people escape from nursing homes and into affordable housing. But, Stavros can't find enough accessible units that are affordable. The City should do a better job making housing accessible and or adaptable, so that people who are wanting to get out of nursing homes can find a place to live.
- Universal design. Accessible housing doesn't have to look different. HUD says you can prioritize housing for people who need assistance.
- Is low opportunity a euphemism for high crime? Need to define opportunity neighborhood.
- Transit system is a joke.
- Subsidized housing inventory that identifies the number of accessible housing units is desperately needed. Stavros would love to know where the accessible units are and do a better job of matching people with needs to the appropriate places. Need to keep track of accessible units and make sure they are available to people who need them.
- Sequester and section 8 being yanked. Sounds scary. Do not see this being addressed.
- On p. 8 it talks about discrimination in the form of a lack of awareness of fair housing laws. This indeed happens. Small time landlords discriminate. And tenants don't know enough to push back. I think education is a good thing, but you need to educate tenants because that might be a better use of money.
- Fair market rents are too low. Amherst is losing all their fair market housing. Springfield luckily has a lot more affordable housing, but it's not in the right places.
- Give points to builders for making developments accessible.
- City can create its own code for accessibility. Make the doorways wide and the bathrooms wide for grab bars and for wheel chairs.
- Phrase low opportunity neighborhoods feels like a big fat lie. A nice way of saying a depressing neighborhood.
- You don't want to have segregation by ability either. Springfield has a lot of work to do. Anything that gets re built, make it all accessible. Local code. Or points. Incentivize or mandate.

Frank Moselle, Six Corners:

- My question is about tearing housing down and fixing them up. Last year or so noticed red x's being put on homes, and a lot of homes being torn down. Why tear them down if it's just a roof being damaged. Why not fix them up?
- People walking around with their tool belts on, ready to go to work. Why not put them to work?

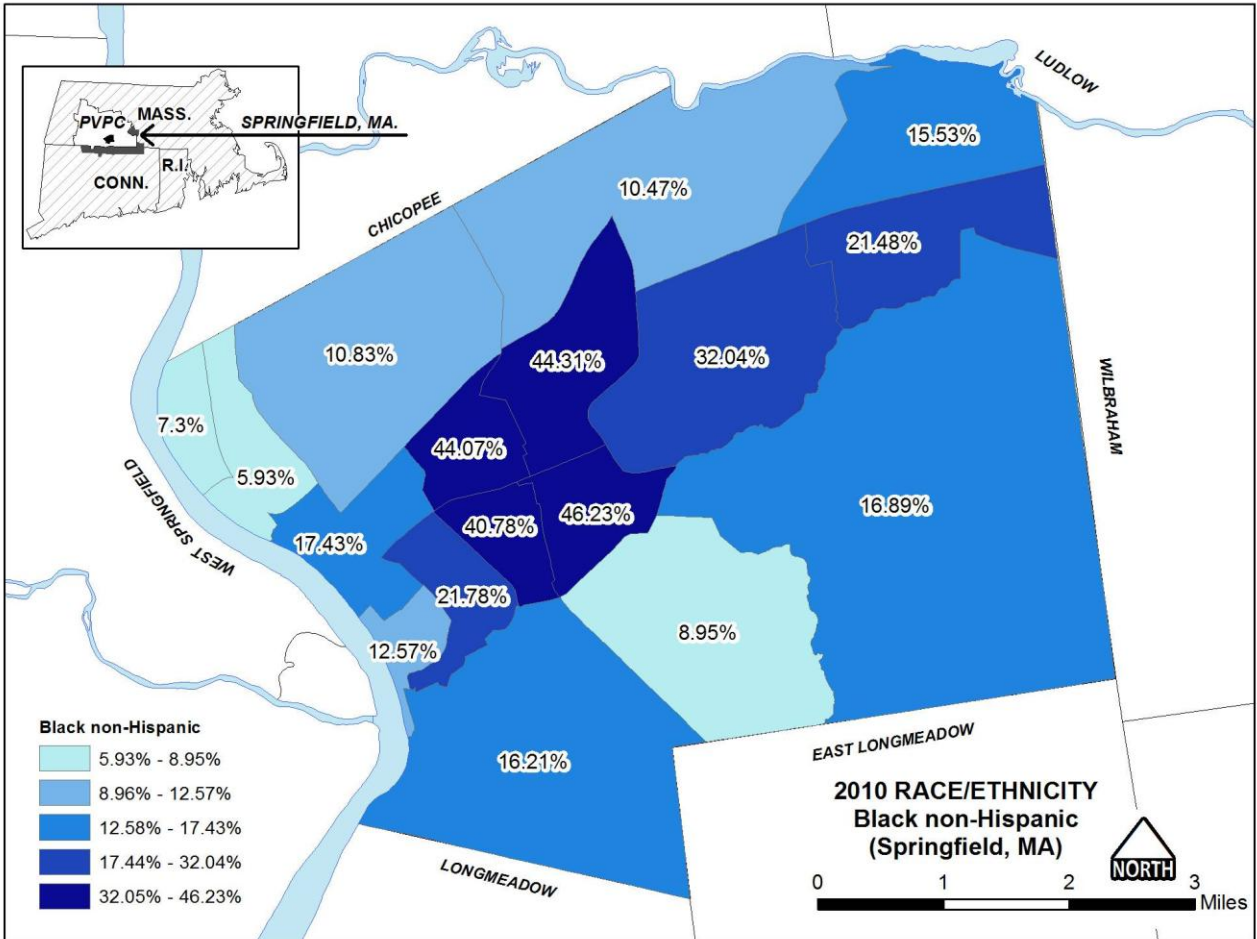
Rhonda Sherrill, resident at Hill Homes:

- On the impediments-do you feel segregation has anything to do with it?
- *Response-We are taking comments.*
- Springfield has a lot of new ideas about building on Central Street. Is that the only place where the city is going to be building new housing?
- *Response-that is a different planning process.*
- I didn't know the survey was there. How was the survey publicized?
- *Response: Plan explains that. Let's get back to the comments. I would love to hear your specific recommendations.*

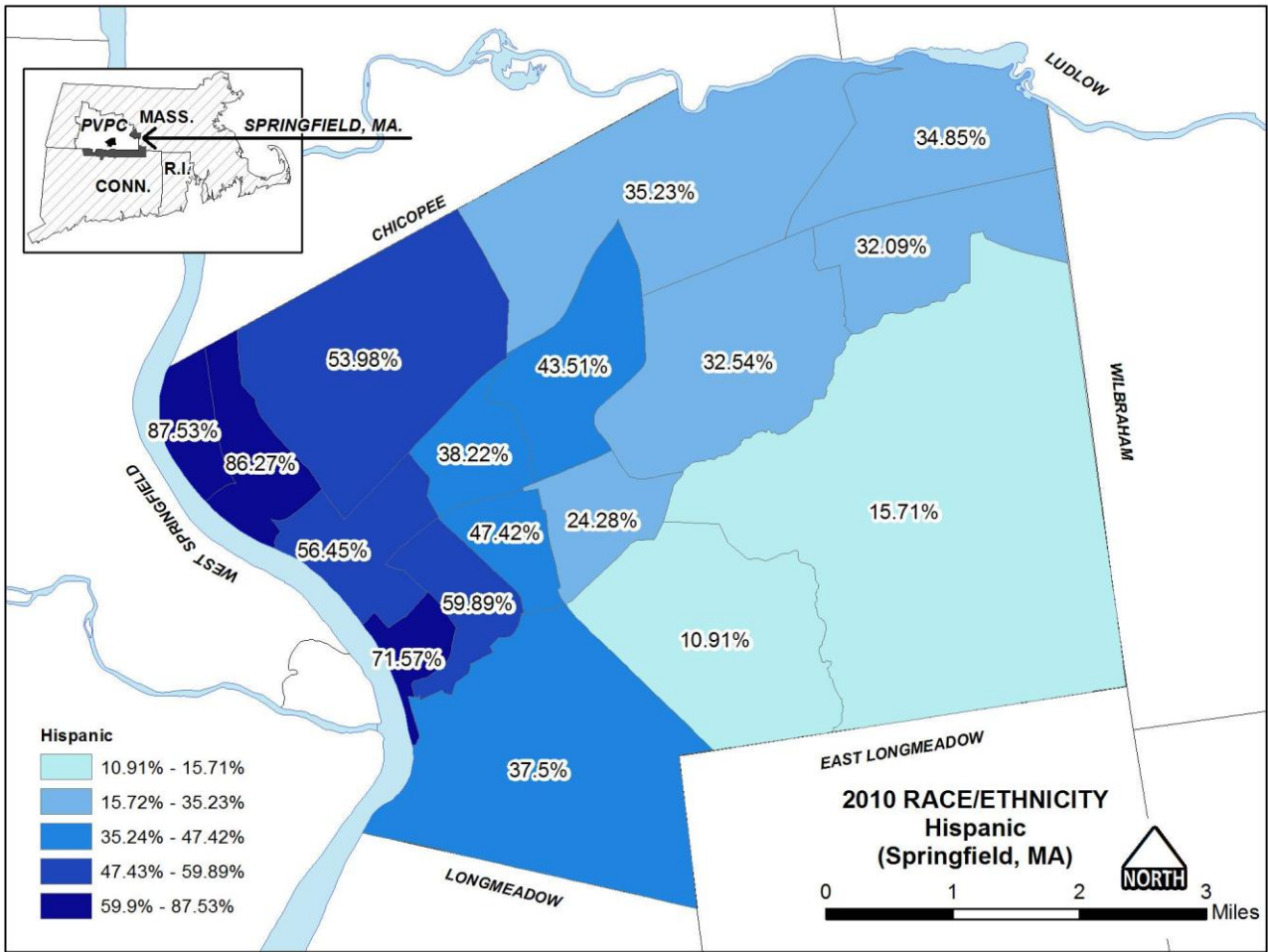
SPRINGFIELD NEIGHBORHOODS BY RACE AND ETHNICITY

AFRICAN AMERICAN POPULATION BY NEIGHBORHOOD 2010

Springfield's African American population live in all City neighborhoods, but are concentrated in the Bay, McKnight, Upper Hill and Old Hill neighborhoods. Census data shows 44% of McKnight neighborhood residents are non-Hispanic black, 46% in the Upper Hill, 41% in Old Hill and 44% in Bay.

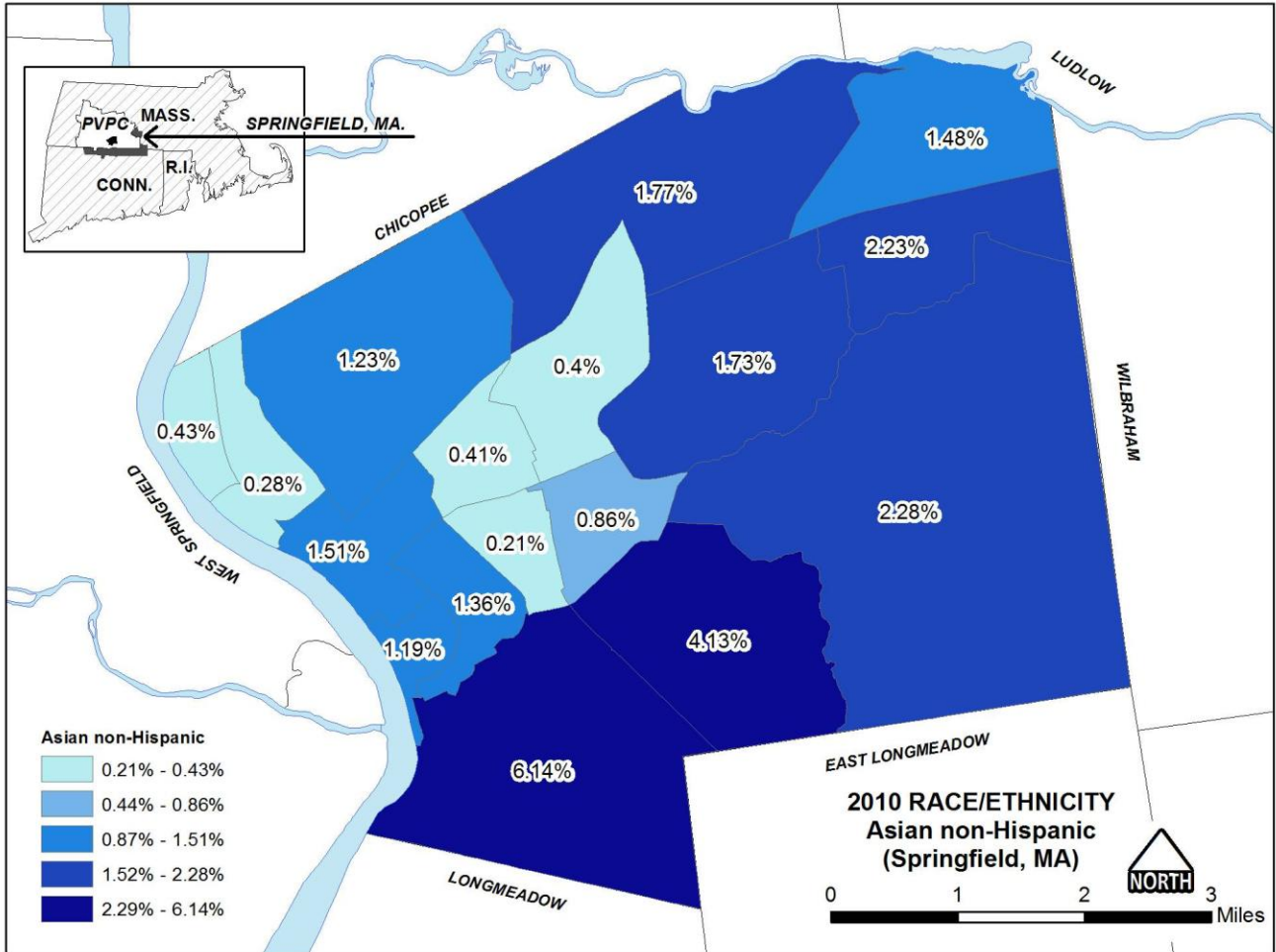


HISPANIC POPULATION BY NEIGHBORHOOD 2010



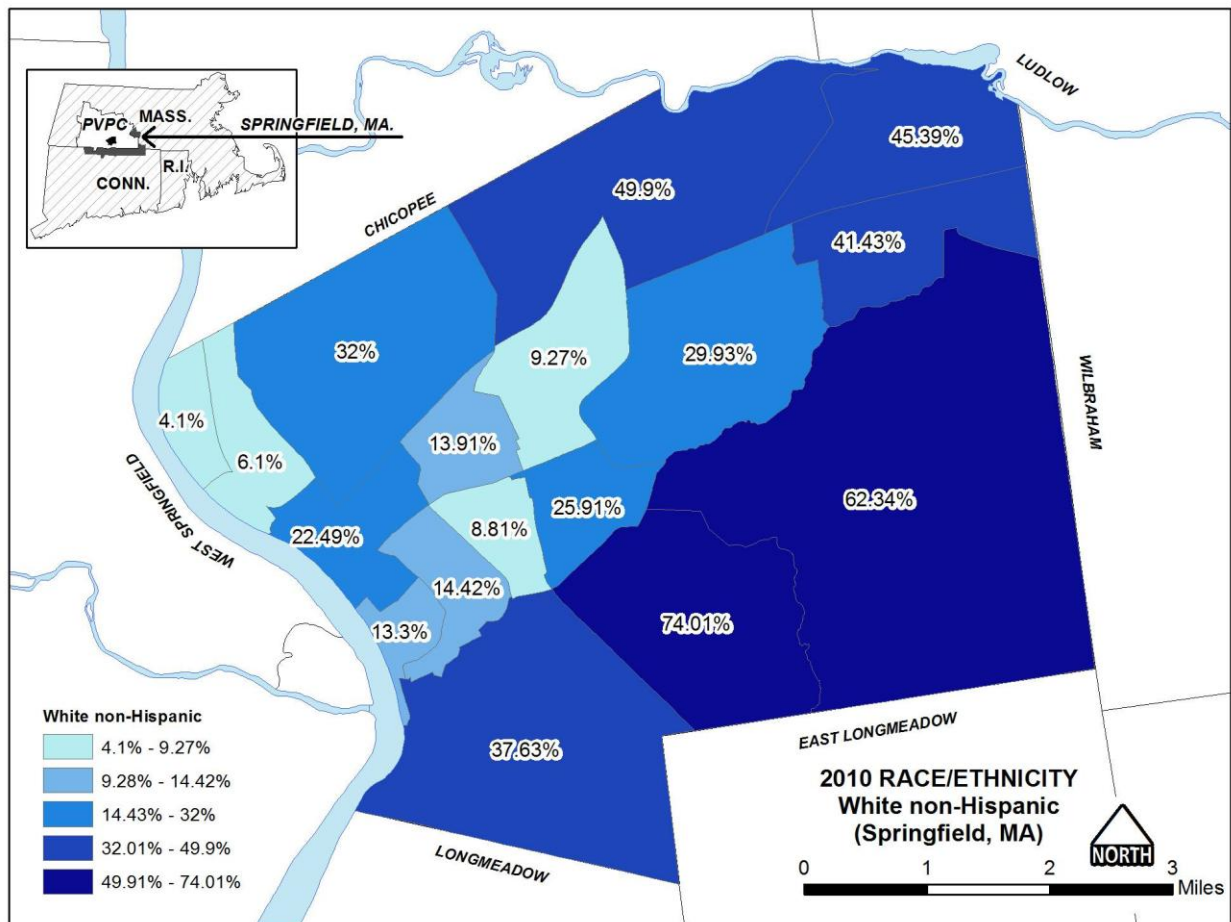
Springfield’s Hispanic population has grown significantly in the last forty years; making up just 3% of the total population in 1970 and expanding to 37% of the total population according to the Census’ American Community Survey statistics for 2007-2011. The City’s Memorial Square and Brightwood neighborhoods have been the historic centers of these concentrations. Today, 86% of the population of the Memorial Square neighborhood is Hispanic and 88% of the Brightwood neighborhood. High concentrations of Hispanic residents also exist in the South End (72% of total population), Six Corners (60%) and Metro Center (57%).

ASIAN POPULATION BY NEIGHBORHOOD 2010

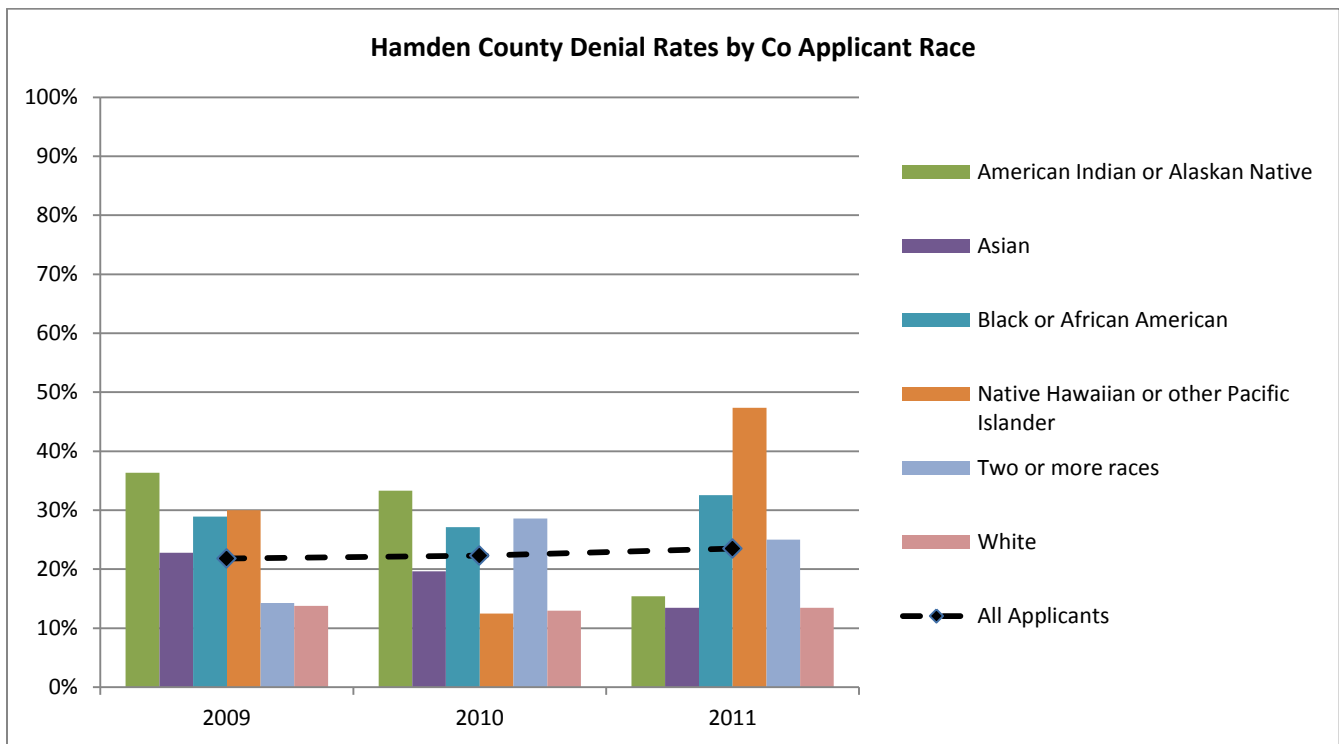
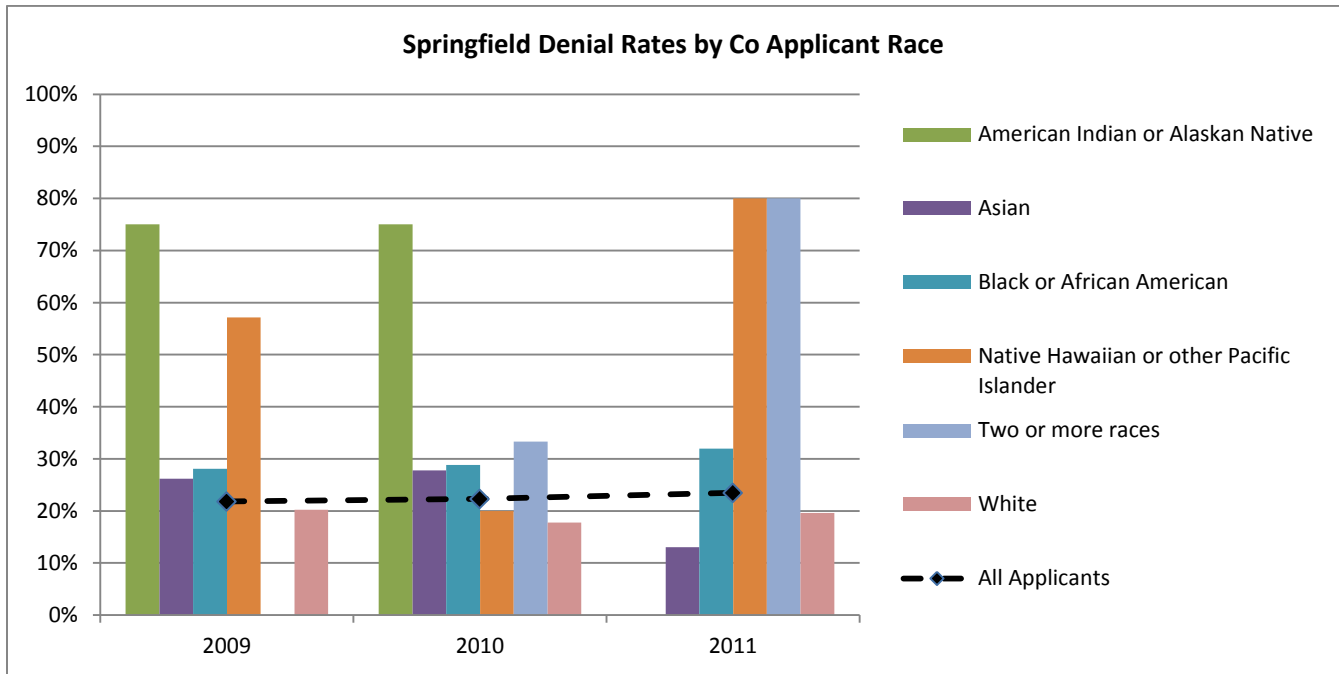


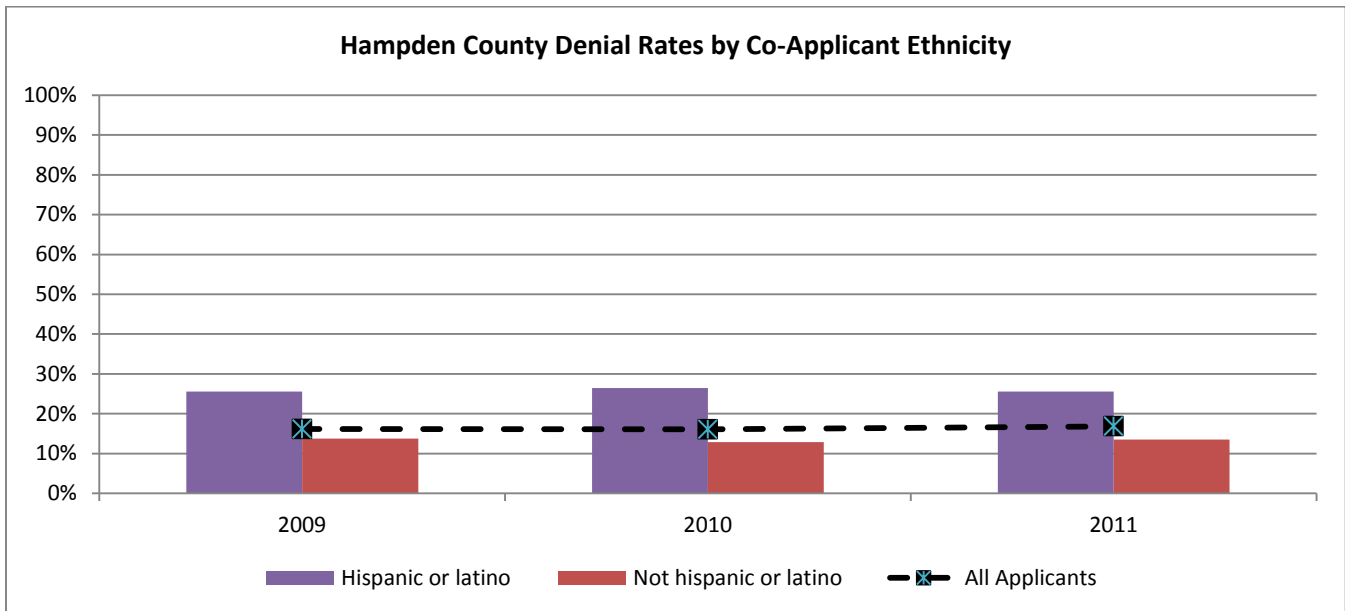
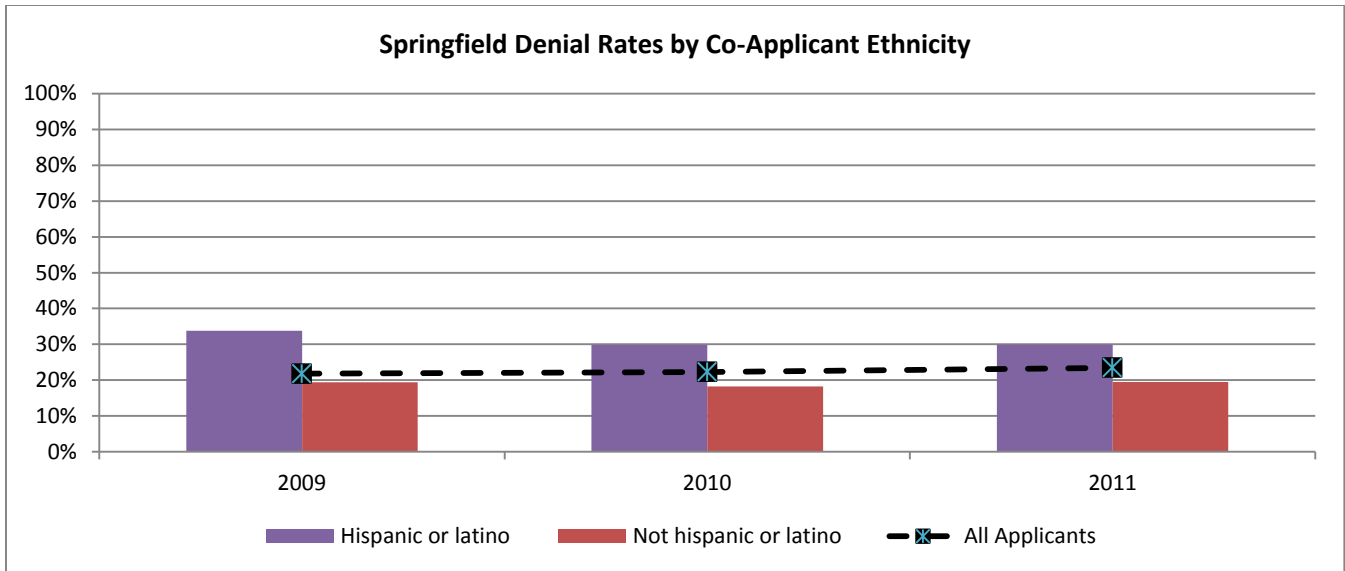
Springfield’s Asian population is concentrated in the Forest Park and East Forest Park neighborhoods where 6% and 4% of their respective populations are Asian.

NON-HISPANIC WHITE POPULATION BY NEIGHBORHOOD 2010



LENDING ANALYSIS DATA





Denial Reason By Race

Applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	1	0	4	0	0	0	1	0	0
Asian	15	0	11	5	3	1	3	0	5
Black or African American	32	2	51	30	4	1	4	2	18
Native Hawaiian or other Pacific Islander	3	0	6	0	0	0	0	0	0
Two or more races	1	0	4	0	1	0	1	0	0
White	123	14	150	101	22	19	32	3	94

2010 Springfield		Denial Reason							
Applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	0	0	3	0	0	0	0	0	0
Asian	11	1	9	3	1	0	3	1	3
Black or African American	35	1	54	32	6	9	6	0	18
Native Hawaiian or other Pacific Islander	3	0	2	2	0	1	0	0	1
Two or more races	3	0	4	2	0	0	0	0	1
White	158	14	200	130	16	17	39	4	79

2009 Springfield		Denial Reason							
Applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	2	1	2	1	0	1	0	0	0
Asian	13	2	6	9	3	1	1	1	7
Black or African American	48	3	87	61	9	6	5	1	25
Native Hawaiian or other Pacific Islander	0	0	3	2	2	1	0	0	1
Two or more races	1	0	3	1	0	1	2	0	2
White	181	7	228	174	24	12	24	8	89

Denial Reason by Race, Continued

2011 Springfield		Denial Reason							
Co-applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	0	0	0	0	0	0	0	0	0
Asian	2	0	2	2	0	0	1	0	0
Black or African American	6	0	4	4	0	3	0	1	5
Native Hawaiian or other Pacific Islander	2	0	4	0	0	0	0	0	0
Two or more races	1	0	2	1	1	0	0	0	0
White	28	4	43	35	6	7	8	0	26

2010 Springfield		Denial Reason							
Co-applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	0	0	2	0	0	0	0	0	1
Asian	5	0	1	2	0	0	0	1	1
Black or African American	8	0	7	9	0	1	0	0	2
Native Hawaiian or other Pacific Islander	0	0	1	0	0	0	0	0	0
Two or more races	1	0	1	1	0	0	0	0	0
White	35	2	58	43	4	0	10	2	26

2009 Springfield		Denial Reason							
Co-applicant Race	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
American Indian or Alaskan Native	0	0	0	2	0	0	0	0	0
Asian	2	0	3	1	2	0	0	0	0
Black or African American	7	2	9	14	1	1	0	0	3
Native Hawaiian or other Pacific Islander	0	0	1	1	1	0	0	0	0
Two or more races	0	0	0	0	0	0	0	0	0
White	48	2	71	64	6	3	4	1	25

Denial Reason By Ethnicity

2011 Springfield		Denial Reason							
Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	44	5	79	22	12	6	7	1	27
Not Hispanic or Latino	136	10	170	119	19	16	35	4	93

2010 Springfield		Denial Reason							
Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	62	4	80	40	3	3	10	1	21
Not Hispanic or Latino	150	12	203	133	21	24	37	4	85

2009 Springfield		Denial Reason							
Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	82	4	121	63	6	8	9	2	27
Not Hispanic or Latino	174	12	229	190	33	18	22	8	105

2011 Springfield		Denial Reason							
Co-Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	10	3	19	8	2	2	1	0	8
Not Hispanic or Latino	31	1	37	36	5	8	8	1	25

2010 Springfield		Denial Reason							
Co-Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	12	0	17	9	1	0	4	0	9
Not Hispanic or Latino	37	2	57	48	3	1	6	3	23

2009 Springfield		Denial Reason							
Co-Applicant Ethnicity	Debt-to-income ratio	Employment History	Credit History	Collateral	Insufficient cash	Unverifiable information	Credit application incomplete	Mortgage insurance denied	Other
Hispanic or Latino	16	2	42	24	0	1	1	1	6
Not Hispanic or Latino	43	2	50	60	10	3	3	0	24