

City of Lowell
Massachusetts

**ANALYSIS OF IMPEDIMENTS TO FAIR
HOUSING CHOICE
2011**

FINAL REPORT

Office of the City Manager
Department of Planning and Development
JFK Civic Center, 50 Arcand Drive
Lowell, MA 01852
978-446-7200

June 2011



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If You Believe That Your Right To Fair Housing Has Been Violated

Persons who believe they have been discriminated against should contact:

The Fair Housing Center of Greater Boston:

By calling 617-399-0491; TTY users, please call the MA Relay Service at 1-800-439-2370.

By sending a fax to 617-399-0492.

By writing to:

Fair Housing Center of Greater Boston
59 Temple Place #1105
Boston, MA 02111.

Or by sending an email to info@bostonfairhousing.org.

www.bostonfairhousing.org

Questions or Concerns Regarding the 2011
Analysis of Impediments Should Be Directed to:

The City of Lowell

Department of Planning and Development
978-446-7200

<http://www.lowellma.gov/depts/dpd>

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1.0 INTRODUCTION AND EXECUTIVE SUMMARY OF THE ANALYSIS

What is the AI?

The Analysis of Impediments to Fair Housing Choice (AI) is an assessment of how laws, government policies, real estate practices and local conditions affect the location, availability and accessibility of housing. The analysis of their impact on housing choice can highlight areas where corrective actions might broaden the housing options of persons protected by fair housing laws.

Fair Housing

Fair housing choice is the ability of persons of similar income levels to have available to them the same housing choices regardless of race, color, religion, sex, handicap, familial status, or national origin. In an effort to end housing segregation, the U.S. Congress passed Title VIII of the Civil Rights Act of 1968 making acts of housing discrimination based on race, sex, national origin, religion, or ethnicity illegal. Congress amended this landmark legislation in 1988 making acts of discrimination against families with children and people with mental or physical illness equally unlawful. Under Massachusetts law it is also unlawful to discriminate against an individual based on his/her sexual orientation or because they are recipients of public assistance, including assistance in the form of housing certificates or vouchers.¹

Purpose of the A.I.

Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, requires that the U.S. Department of Housing and Urban Development (HUD) implement its programs in a manner that affirmatively furthers Fair Housing (AFFH). Until recently, only general guidelines were provided to Community Development Block Grant(CDBG) entitlement communities in fulfilling the AFFH requirement. In 1989, HUD required CDBG grantees to undertake an Analysis of Impediments to Fair Housing Choice (AI). Additionally, grantees are now required to report on progress in meeting the actions to eliminate fair housing impediments in their Consolidated Plan Annual Performance Report (CAPER).

The Consolidated Plan's Certification to "Affirmatively Furthering Fair Housing" requires entitlement communities to undertake Fair Housing Planning. The Analysis of Impediments to Fair Housing Choice should be viewed as part of the City's Consolidated Plan. This report has been completed to meet requirements of the Housing and Community Development Act, as amended, and the U.S. Department of Housing and Urban Development's regulations governing the preparation of the Consolidated Plan. The Lowell Department of Planning and Development conducted this analysis to identify impediments to fair housing in Lowell, Massachusetts.

The City is committed to taking the appropriate actions to overcome the effects of any impediments identified through this analysis, and will maintain records reflecting the analysis of such actions taken in this regard.

Fair Housing verses Affordability

Fair Housing choice is a complex issue involving diverse and wide-ranging considerations. Because of this inherent complexity, it is important to understand and distinguish between the "impediments to fair housing choice" and "barriers to affordable

¹ For a full chronology of Federal Fair Housing legislation, please visit <http://www.hud.gov/offices/ftheo/FHLaws/index.cfm>.

housing". In undertaking this analysis, the role of economics, historical housing patterns, and personal choice are important to consider when examining fair housing choice. Affordability in the market is largely dependent upon supply and demand and proximity to public transportation. The economics of the marketplace, therefore, limits the availability of housing to households with limited income and may lead to the concentration of low-income minority groups in certain neighborhoods with more readily available affordable housing.

The purpose of fair housing laws extend beyond the basic issues of economics to consider discrimination within the housing delivery system that impedes a household's ability to make a personal housing choice that is within their economic means. Impediments to fair housing choice are defined as any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict the availability of housing choice. It also includes any actions, omissions, or decisions that have this effect. Discrimination includes discriminatory rental, real estate, and lending practices, Not In My Backyard (NIMBY) attitudes, and exclusionary zoning regulations that limit housing choices for minorities, families with children, and other protected classes. This analysis attempts to examine the impediments to housing choice within that context.

The barriers to affordable housing are addressed extensively in the City's Consolidated Planning document. Although the barriers to affordable housing are related to fair housing choice, this document will focus on the impediments to fair housing.

1.1 WHO CONDUCTED

The City of Lowell's Department of Planning and Development (DPD) prepared the Analysis of the Impediments to Fair Housing Choice. The DPD is the lead agency in administering the City's HOME Program, Community Development Block Program (CDBG), Emergency Shelter Grant Program (ESG), and the Continuum of Care McKinney Programs. DPD is also the lead agency for administering the Middlesex County's Housing Opportunities for People with AIDS (HOPWA) Program. Lastly, DPD has most recently administered federal funds allocated through both the Housing and Economic Recovery Act of 2008 and the American Recovery and Reinvestment Act of 2009.

1.2 PARTICIPANTS

Participants in the 2011 A.I. included public officials from the city, residents, local housing authorities, social service providers, local businesses and community-based and other non-profit organizations. All of the following contributing stakeholders provided valuable insight and information. Participating agencies included:

- Alternative House
- Cambodian Mutual Assistance Association
- Coalition for a Better Acre
- City of Lowell Continuum of Care
- City of Lowell Council on Aging
- City of Lowell Department of Planning and Development
- Community Teamwork, Inc.
- Fair Housing Center of Greater Boston
- Foreclosure Prevention Taskforce
- Greater Lowell Landlord's Association
- Independent Living Center
- LifeLinks, Inc.

- Lowell Association for the Blind
- Lowell Housing Authority
- Lowell Transitional Living Center
- Massachusetts Commission Against Discrimination
- Merrimack Valley Housing Partnership
- Merrimack Valley Housing Report
- Merrimack Valley Legal Services
- Northeast Association of Realtors
- ONE Lowell
- University of Massachusetts—Lowell

1.3 METHODOLOGY USED

The intent of this report is to update the 2006 Analysis of Impediments to Fair Housing Choice, a comprehensive review of policies, practices and procedures that affect the location, availability, and accessibility of housing and current residential patterns and conditions. The updated version achieves the following:

- Updates the existing conditions presented in the 2006 AI;
- Reviews the 2006 impediments and recommendations along with the Actions taken to address them;
- Assesses whether the City has made substantive progress towards eliminating the impediments;
- Analyzes any additional impediments that exist using updated data and information, public hearings, interviews, recent City of Lowell Planning documents, and other documents that have been completed since 2006; and
- Recommends actions to address any new impediments

The update was developed based on a variety of resources and methods including:

- The distribution of a fair housing survey designed to measure the local housing climate in the City of Lowell. This survey was completed by local non profits and their clients, real estate agencies, developers and planners, property managers, fair housing advocates and residents;
- Consideration of public input from public hearings;
- Demographic analysis at the block group level using Geographic Information Systems(GIS);
- Interviews and focus group meetings with City Departments, Housing Authority officials, and organizations representing all facets of the local housing community; and
- Independent comment submittals from local fair housing stakeholders

The City of Lowell is defined by 11 neighborhoods, is divided into 26 Census Tracts and is further divided into 84 Block Groups (see Map 1-1 and Map 1-2). Of these geographic boundaries, whenever possible this report uses Block Group data to analyze demographic and housing characteristics for the following reasons:

- HUD uses Block Groups as the geographic threshold for determining areas that have low-to-moderate income levels eligible for Community Development Block Grant funds;

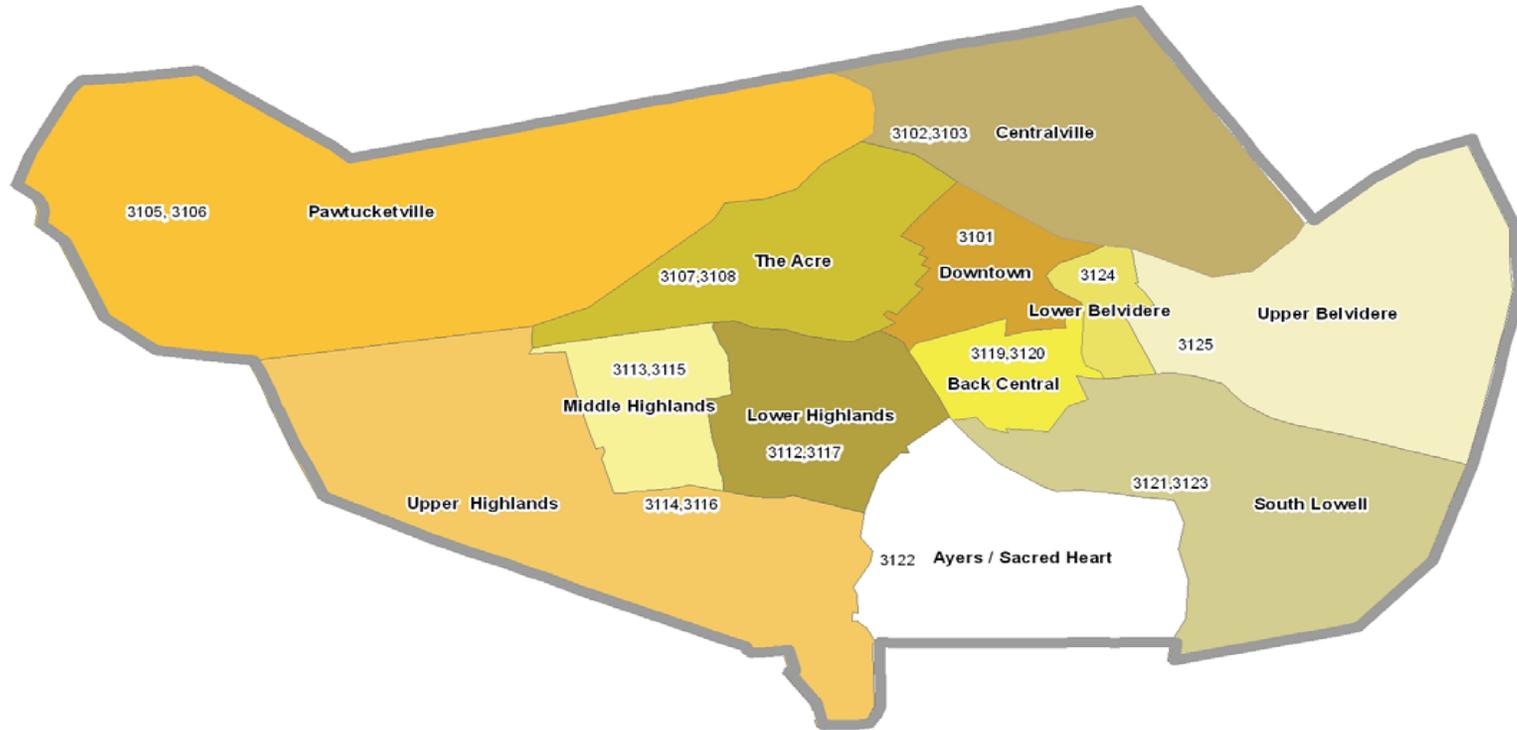
- Census Tracts with relatively low concentrations of poverty and/or minorities may contain Block Groups with high concentrations of poverty and/or minorities, masking the distressed block group; and
- Block Groups are better suited for assessing the impacts of a neighborhood revitalization plan because Block Group data identifies specific physical characteristics, availability of public services, and demographics of an impacted area.

Refer to maps 1-1 thru 1-5 and tables 1-1 and 1-2 below for further Block Group information and demographics.

A note regarding the data used in this report: block-group level data from the 2010 Census was not available for the release of this report. Therefore, to allow for detailed block-group level analysis, many of the tables, charts and maps used in this document are based on Census data from the year 2000. When available, Census Tract data from the 2010 Census and American Community Survey data is provided to update and supplement the Block Group data from 2000. Although this data is somewhat limited in scope, it is included to make the 2011 AI more accurate and complete.

MAP 1-1

City of Lowell Neighborhoods and Census Tracts



Source: U.S. Census and City of Lowell, DPD



*note: A change was made to the Census tracts within the City of Lowell for the 2010 Census. Census tracts 3108 and 3110 (in the Acre) were combined into a single Census tract: 3883.

Table 1-1: Lowell Block Groups with High Concentrations of Minority Populations

Census Tract	Block Group	Neighborhood	Total Population	Non-Hispanic Population					Hispanic Population	% Minority
				White	Black	American Indian	Asian	Other		
311100	2	Acre	1306	222	71	1	595	47	370	83%
311200	1	L. Highlands	1743	368	65	6	899	50	355	79%
311100	1	Acre	980	219	29	2	369	58	303	77%
310800	2	Acre	793	182	29	0	292	37	253	77%
311000	1	Acre	1565	435	50	11	238	28	803	72%
311800	3	L. Highlands	1782	523	71	8	723	112	345	70%
310100	3	Downtown	1441	459	173	5	180	61	563	68%
311200	3	L. Highlands	1631	547	32	3	786	73	190	66%
311800	4	L. Highlands	1734	604	46	4	680	146	254	65%
311000	3	Acre	1189	409	64	2	151	74	489	65%
311400	3	Highlands	2294	915	98	3	806	77	395	60%
311300	1	L. Highlands	1209	483	49	3	498	61	115	60%
311700	4	L. Highlands	1711	722	54	7	779	41	108	58%
311600	9	Highlands	959	412	60	1	207	16	263	57%
310400	3	Centralville	1380	601	79	8	212	59	421	56%
311900	2	Back Central	890	398	24	0	132	84	252	55%
311700	3	L. Highlands	1190	546	29	0	411	38	166	54%
312200	2	Ayers City	1067	497	38	7	199	39	287	53%
312000	3	Back Central	1570	757	57	0	351	116	289	52%
311400	4	Highlands	1762	855	114	4	658	31	100	51%
312400	2	L. Bevlidere	1763	866	36	1	179	91	590	51%
312100	1	S. Lowell	1216	619	28	2	284	77	206	48%
310700	2	Acre	1537	810	69	2	309	52	295	47%
312000	2	Back Central	620	339	11	0	68	51	151	45%
310100	2	Downtown	1402	766	60	2	69	39	466	45%
311500	2	L. Highlands	1230	703	40	2	419	30	36	43%
311300	2	L. Highlands	1555	887	73	2	351	68	174	43%
310400	1	Centralville	1058	603	33	1	96	39	286	43%
312400	1	L. Bevlidere	642	369	30	4	26	35	178	43%
312100	3	S. Lowell	932	541	34	1	181	73	102	42%
310700	1	Acre	1855	1020	76	1	338	101	269	42%
311900	3	Back Central	1193	687	52	4	124	52	274	42%
312000	1	Back Central	787	461	42	1	34	70	179	41%
312100	2	S. Lowell	964	568	15	0	172	92	117	41%
311700	2	L. Highlands	1097	656	53	2	321	6	59	40%
310100	1	Downtown	1038	624	94	2	78	20	220	40%
310300	2	Centralville	1623	978	99	1	95	114	345	40%
311700	1	L. Highlands	925	561	18	3	218	36	89	39%
311900	1	Back Central	583	355	14	0	43	45	126	39%
312200	1	Ayers City	1906	1190	65	2	338	36	275	38%
312200	3	Ayers City	887	560	47	0	93	44	143	37%

Source: US Census, 2000

Note: Census tracts in bold indicate area of high concentration of both low-income households and minority populations.

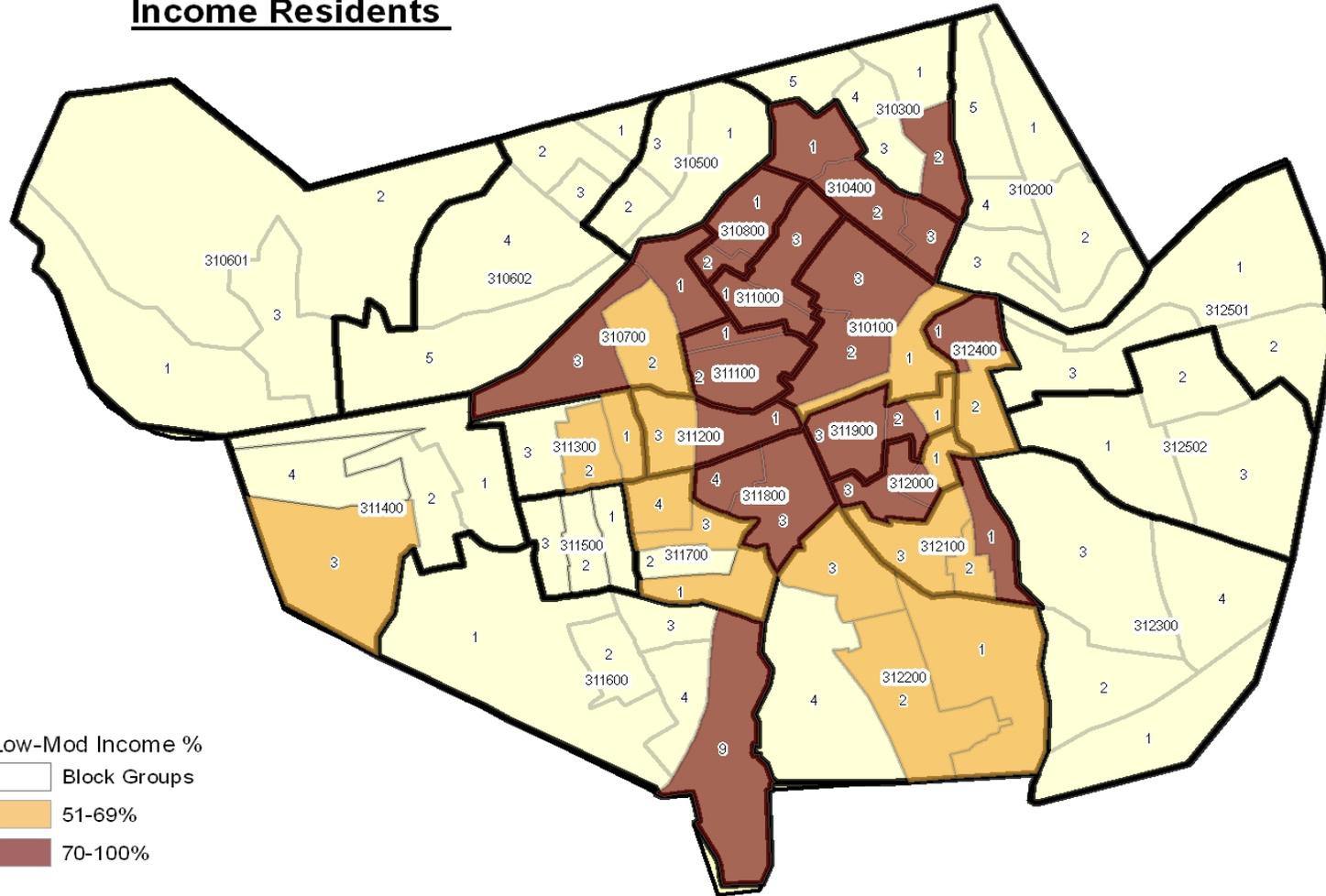
Table 1-2: Lowell Block Groups with High Concentrations of Low and Moderate Income Households

Census Tract	Block Group	Neighborhood	Total Households	% Low-Mod Income
311000	1	Acre	700	97%
310100	3	Downtown	648	91%
312400	1	Lower Bevidere	345	91%
311900	3	Back Central	669	87%
310100	2	Downtown	750	83%
311000	3	Acre	508	83%
311200	1	Lower Highlands	542	83%
310400	3	Centralville	428	79%
310800	2	Acre	251	79%
311600	9	Highlands	365	79%
311100	1	Acre	266	78%
310800	1	Acre	94	77%
310300	2	Centralville	612	76%
311800	3	Lower Highlands	474	76%
311900	2	Back Central	276	76%
312100	1	South Lowell	446	76%
310400	1	Centralville	332	75%
312000	2	Back Central	200	74%
310700	1	Acre	691	73%
310700	3	Acre	282	73%
310400	2	Centralville	397	72%
311800	4	Lower Highlands	503	72%
312000	3	Back Central	505	72%
311100	2	Acre	308	70%
312400	2	Lower Bevidere	596	69%
311300	2	Lower Highlands	518	68%
312200	2	Ayers City	349	68%
310100	1	Downtown	532	66%
312200	3	Ayers City	279	65%
311700	4	Lower Highlands	537	64%
312100	2	South Lowell	326	64%
311700	3	Lower Highlands	355	63%
311900	1	Back Central	186	63%
310700	2	Acre	545	62%
311200	3	Lower Highlands	532	62%
311300	1	Lower Highlands	406	59%
312000	1	Back Central	265	56%
311400	3	Highlands	892	55%
312100	3	South Lowell	322	53%
311700	1	Lower Highlands	317	52%
312200	1	Ayers City	768	52%
311700	2	Lower Highlands	347	51%

Source: US Census, 2000

Note: Census Tracts in bold indicate areas of high concentration of both low-income households and minority populations.

MAP 1-4 Block Groups with High Concentration of Low to Moderate Income Residents



Source: U.S. Census and City of Lowell, DPD

1.3.1 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE SURVEY

In order to gather data and public comment for the 2011 Analysis of Impediments to Fair Housing Choice, The Department of Planning and Development distributed a survey to local area residents and housing industry professionals. The survey was made available from November of 2010 through February of 2011. A copy of this survey has been included in the appendix section of this report. In total, the survey had 122 responses. Below is a summary of the most significant results from these responses:²

Familiarity with fair housing laws: 52.1% of those surveyed claimed that they were only somewhat or not at all familiar with fair housing laws. This speaks to the need for outreach and education in the community.

Training on fair housing laws: 82.3% of those who answered this question replied that they were unaware of or that there is not a credible fair housing training process in the City.

Outreach on affirmatively furthering fair housing: 69.5% of respondents said that the outreach on affirmatively furthering fair housing in Lowell could be better or is currently non-existent.

Barriers to fair housing: Just under half (47.7%) of those surveyed claimed that they see barriers to fair housing in Lowell. Of these respondents, there was no predominant category of discrimination that significantly outweighs the others. Source of income is the highest at 30.4%.

Direct or indirect experiences with housing discrimination: 78.2% of respondents reported that they had not experienced any form of housing discrimination (either themselves or someone they know).

Reporting fair housing violations: Of the options presented, no single option for reporting fair housing violations was selected over any other. This lack of a centralized, easily identifiable location to report fair housing violations impedes the overall process of addressing fair housing concerns in the City. On the optional comment section from this question, more people identified Community Teamwork Inc.—a Lowell-based multi-service provider—than any other local organization, but no single CTI initiative was cited over any other.

Boards and Commissions: 41.1% of respondents reported that the City's housing commissions and boards do not provide proper representation to the diverse sub-populations throughout the City. Additionally, in the optional open comments section, four individuals specifically cited lack of diversity on these boards and commissions as a fair housing concern.

² **A note on the respondents of this survey:** While an overwhelming majority (89.3%) of those surveyed identified as white and more than half (53.4%) identified themselves as having an income in the highest bracket—at or above 50% of the Area Median Income, it should be noted that the Department of Planning and Development distributed this survey to local organizations serving low income and minority populations of Lowell. The survey was advertised and made available through the City's website and was distributed to dozens of nonprofits in the region that represent the City's low/moderate and minority populations. Hard copies of the survey were made available for those without access to the internet. Additionally, free public internet access is available at the Pollard Memorial Library and the Lowell Senior Center. For non-English speakers, the survey was distributed to partner organizations that made staff available to translate and assist in filling out the survey. Many of the respondents (approx 1/3) identify themselves as "in-need service providers"—reporting on behalf of their clients. Overall, the findings of this survey correlated closely with narrative accounts presented by local area housing advocates and providers in focus group meetings.

1.4 HOW FUNDED

The 2011 AI was funded with administrative and planning funds from the Community Development Block Grant (CDBG).

1.5 CONCLUSIONS

Impediments to fair housing choice are defined as “any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.”

This section summarizes the impediments and recommendations identified in 2011. Please refer to Chapter 6 for a complete discussion of these impediments and recommendations, as well as a summary of actions taken to address impediments and recommendations from the 2006 A.I.

Impediment 1: Lack of Fair Housing Outreach and Education:

The City of Lowell currently lacks fair housing outreach and education on the community-wide level. Input received during the City’s outreach efforts in the development of this document indicates that local housing and social service providers are knowledgeable about fair housing rules and assist clients in a wide range of housing matters, including discrimination. While this education and advocacy is valuable, these efforts typically only reach a small population and are not providing outreach community-wide. Many organizations stressed the need for a coordinated effort to provide training and outreach targeting all Lowell residents. The availability of these services will help residents develop an increased understanding of their rights under the law. Such coordinated training and outreach would also be valuable to organizations and entities that have an impact on housing access and availability including non-profit service providers, land use boards and commissions, and landlord/ real-estate organizations.

Impediment 2: Lack of Fair Housing Enforcement:

The City of Lowell currently lacks a direct and accessible process for reporting potential acts of housing discrimination. Filing a discrimination case is a lengthy process requiring extensive resources and knowledge of the legal system. While there are many organizations in Lowell that are able to provide guidance to their specific client base, these organizations are limited in the amount of time and resources they are able to dedicate to potential cases of housing discrimination. In most cases, clients are referred out to MCAD or a private attorney. The availability of these fair housing services will make it easier for residents to file a complaint if they believe they have been victims of discrimination.

Impediment 3: Potential for Discrimination against Children with Families Due to the Presence of Lead Paint:

The City of Lowell’s Lead Abatement Program has made substantial progress in providing outreach and education regarding lead paint poisoning and Massachusetts lead paint laws to both property owners and renters. Since 2000, as a recipient of HUD’s Lead Abatement grant, the City has assisted 787 units in removing lead-based paint with direct financial assistance. Despite these efforts however, The Massachusetts Department of Health and Human Services continues to classify Lowell as a “high-risk” community for cases of lead poisoning. This designation, coupled with a sizable inventory of housing units built before 1978 (according to 2009 ACS data- over 80% of the city’s housing stock), indicate the need to continue outreach and abatement in order to avoid the potential for discrimination against families with young children.

Recommendation 1: Continue to encourage the development of a variety of housing options for individuals of mixed incomes—especially in areas of high concentrations of minority and low-income populations:

The City of Lowell has historically been home to significant populations of low income, immigrant and minority populations. This historical trend continues at present and has presented challenges for the City when attempting to circumvent the adverse effects associated with “pockets of poverty.” The City has made significant progress in recent years to de-concentrate poverty in its downtown neighborhood with the development of market rate units in former industrial mill buildings. More than 1,600 units were added to the City’s housing stock since 2000 to Lowell’s downtown, without losing a single affordable unit. To continue to deconcentrate these areas of low-income and minority populations, the City should continue to encourage the development of a variety of housing options for individuals of mixed incomes. Diversifying housing options in areas with low-income and minority concentrations will work to reduce these concentrations without displacing any affordable housing throughout the city.

Recommendation 2: Promote Diversity on City Boards and Commissions:

Since the release of the 2006 AI, progress has been made to diversify many of the City’s boards and commissions. In response to the growing number of new immigrants in the City and in recognition of the need to advocate for these families the City initiated the Immigration Commission. The City also appoints members to its Disability Commission whose job is to advise the City Manager on issues related to Lowell’s handicapped population. With the exception of these two boards, however, members on the more than 20 Boards and Commission in the City are still not representative of Lowell’s diverse population. This lack of representation, especially on some of the City’s land use boards, has the potential to impact the availability and accessibility of housing for households falling within a protected class. The City should continue to take the appropriate steps to work towards providing these diverse demographics with proper representation on City Boards and Commissions.

Recommendation 3: Formalize a Limited English Proficiency (LEP) Plan:

In August 2000, Executive Order 13166 titled “Improving Access to Services by Persons with Limited English Proficiency” was issued. The Order requires federal agencies and recipients of federal funds to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. While the City has several mechanisms in place to ensure that the diverse populations of Lowell are granted equal access to information and services provided by the City, these policies and procedures are not formalized in an LEP Plan. The development of such a plan will provide the City with an opportunity to assess its current practices and identify steps it can take to ensure equal access to its programs is available to all residents.

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2.0 JURISDICTIONAL BACKGROUND

Demographic Data

Lowell, Massachusetts, the nation's first successful planned industrial community, is located in northern Middlesex County in the northeastern section of Massachusetts. The city is bisected by the Merrimack River and is located approximately 25 miles north of Boston. Lowell has a land area of 13.38 square miles with the remaining 0.89 square miles covered by surface water. The total area within the Lowell city border is 14.27 square miles. The major bodies of water that have had tremendous impact on the development and success of the City are the Merrimack River and the Concord River.

The city is a diverse urban/suburban community built primarily around the extensive industrial mill complexes along the Merrimack River. The industrial revolution of the 19th Century gave the city its economic base, heritage, and character that are still prevalent today. Today, the city can be characterized as a highly urbanized community surrounded by wealthier suburban middle and upper-middle class communities including Billerica, Chelmsford, Dracut, Tewksbury, and Tyngsborough.

2.1 POPULATION

The population in Lowell is currently 106,519. This is an increase of 1.3 % from the 2000 US Census.

Lowell witnessed its greatest population growth from 1890 to 1900 (Table 1). During this period the textile mills began to prosper and new commercial and industrial enterprises appeared in the city creating an increased demand for labor. In 1875, the first influx of immigrants began to settle in the city in response to the new employment opportunities. Lowell's population increased from 59,475 in 1880 to 94,969 in 1900.

By the early 1900's, industrial production in Lowell had reached its peak. Lowell's population grew steadily as immigrants continued to move into the city, gradually replacing the early "mill girls" as the major source of labor. By 1920, Lowell's population had reached a high of 112,759.

The resulting Depression and the movement of the textile industry to the south resulted in Lowell's eventual economic collapse. During the decade 1920-1930, Lowell experienced its first significant loss in population, decreasing to 100,234 persons in 1930. The city's population remained stable throughout the Depression of the 1930s. Following the Depression and World War II, the population began a steady decline as residents began to move into the suburbs. Lowell's population decreased 10 percent from 101,389 in 1940 to 92,107 in 1960. Table 1 identifies the historical population increase and decline experienced in Lowell over the past century.

Year	Population	% Change
1880	59,475	
1890	77,695	30.6
1900	94,969	22.2
1910	106,294	11.9
1920	112,759	6
1930	100,234	-11.1
1940	101,389	1.1
1950	97,249	-4.1
1960	92,107	-5.3
1970	94,239	2.3
1980	92,418	-1.9
1990	103,439	10.7
2000	105,167	1.7
2010	106,519	1.3

Source: US Census

In the late 1950s, Lowell began undertaking many urban renewal projects to curtail the growing out-migration of its residents. These efforts achieved limited success. Although Lowell’s population grew in 1970 to 94,239, it dropped off again in 1980 to 92,418. Since 1980, Lowell has experienced a steady increase in its overall population, most likely due to the immigrant populations moving to the City.

2.1.1 POPULATION & DENSITY

As of 2010, the City of Lowell had a population of 106,419 and a population density of 12.1 persons per acre (p/a). Since 1980, the population has increased by 15.3%.

Today, the largest percentage of the population lives in the Highlands neighborhood (17.2%). However, the 10.8 p/a in the neighborhood is just below the City’s density average. The greatest population densities can be found in the neighborhoods of Back Central (26.6 p/a), the Lower Highlands (25.5 p/a), and a portion of the Acre (30 p/a). The lowest population densities are located in South Lowell (6.1 p/a) and Pawtucketville (7.4 p/a). Since 1970, Downtown and a portion of Pawtucketville have experienced the biggest increases in density, with Downtown increasing by 512% and Pawtucketville by 63%. Overall, neighborhoods physically portray their density levels, with more two-family and multi-family homes in highly dense areas and predominantly single-family homes on larger lots in lower density areas.

Perhaps the most significant changes within the city have occurred with the redevelopment of Downtown. As of 2010, the population and density of Downtown has increased by more than five times what it was in 1970. Since 2000, the addition of over 1,600 market-rate units has contributed to a 36% increase of the population in this census tract. The creation of these market-rate units has substantially contributed to the deconcentration of low-income and minority populations in this neighborhood without displacing a single affordable unit. Through a number of aggressive redevelopment plans the City has successfully improved the area with the increase of residential use. Continuing residential development within Downtown will help to relieve growth pressures in other neighborhoods and ensure a vibrant center.

Table 2-2: Lowell Population and Density Trends by Census Tract, 1970-2010

TRACT	Neighborhood	Sq. Mi.	Acres	1970	1970	1970-80	1980	1980	1980-90	1990	1990	1990-00	2000	2000	2000-10	1990-10	1980-10	2010	2010		
				POP	Density	Change	POP	Density	Change	POP	Density	Change	POP	Density	Change	Change	Change	POP	Density		
3101	Downtown	0.384	245.8	859	3.5	121.40%	1902	7.7	75.60%	3340	13.6	16.20%	3,881	15.8	35.70%	57.70%	176.90%	5,267	21.4		
3102	Christian Hill	0.739	473	6117	12.9	-4.00%	5873	12.4	4.50%	6137	13	-1.10%	6,070	12.8	-1.50%	-2.60%	1.80%	5,976	12.6		
3103	Centralville	0.424	271.4	5827	21.5	-6.20%	5463	20.1	4.20%	5695	21	8.10%	6,157	22.7	-2.30%	5.60%	10.10%	6,016	22.2		
3104	Centralville	0.212	135.7	3604	26.6	-10.30%	3233	23.8	9.50%	3540	26.1	1.20%	3,581	26.4	-9.40%	-8.30%	0.40%	3,245	23.9		
3105	Pawtucketville	0.325	208	3636	17.5	-11.00%	3236	15.6	4.90%	3396	16.3	-1.30%	3,353	16.1	2.90%	1.60%	6.60%	3,449	16.6		
3106	Pawtucketville	2.848	1822.7	7131	3.9	26.40%	9012	4.9	16.00%	10450	5.7	5.30%	11,002	6	5.20%	10.70%	28.40%	11,571	6.3		
3107	Acre	0.36	230.4	3825	16.6	1.00%	3864	16.8	8.90%	4207	18.3	8.70%	4,575	19.9	-2.90%	5.60%	14.90%	4,441	19.3		
3108	Acre	0.104	66.6	1754	26.4	43.80%	2523	37.9	6.20%	2679	40.2	-8.30%	2,457	36.9	n/a	n/a	n/a	n/a	n/a		
3110	Acre	0.178	113.9	2332	20.5	-15.80%	1963	17.2	49.10%	2927	25.7	-5.90%	2,754	24.2	n/a	n/a	n/a	n/a	n/a		
3111	Acre	0.172	110.1	2742	24.9	-26.80%	2008	18.2	49.00%	2991	27.2	-23.60%	2,286	20.8	5.40%	-19.40%	20.00%	2,410	21.9		
3112	L. Highlands	0.177	113.3	3257	28.8	-12.80%	2839	25.1	12.50%	3195	28.2	5.60%	3,374	29.8	-3.20%	2.30%	15.10%	3,267	28.8		
3113	Highlands	0.249	159.4	3929	24.7	-8.90%	3581	22.5	-1.70%	3519	22.1	12.40%	3,954	24.8	2.60%	15.30%	13.30%	4,057	25.5		
3114	Highlands	0.849	543.4	3918	7.2	22.10%	4782	8.8	12.80%	5394	9.9	8.60%	5,857	10.8	2.20%	11.00%	25.20%	5,986	11		
3115	Highlands	0.214	137	2847	20.8	-6.40%	2664	19.5	0.80%	2684	19.6	8.30%	2,908	21.2	2.30%	10.80%	11.60%	2,974	21.7		
3116	Highlands	1.341	858.2	5318	6.2	-5.60%	5020	5.8	-2.20%	4911	5.7	3.80%	5,099	5.9	3.80%	7.80%	5.50%	5,295	6.2		
3117	L. Highlands	0.293	187.5	4327	23.1	-9.90%	3897	20.8	12.30%	4375	23.3	12.50%	4,923	26.3	3.60%	16.50%	30.80%	5,098	27.2		
3118	L. Highlands	0.23	147.2	3625	24.6	-21.30%	2854	19.4	16.50%	3324	22.6	5.80%	3,516	23.9	-0.10%	5.70%	23.10%	3,513	23.9		
3119	Back Central	0.171	109.4	4075	37.2	-38.50%	2507	22.9	15.10%	2885	26.4	-7.60%	2,666	24.4	-8.90%	-15.80%	-3.10%	2,429	22.2		
3120	Back Central	0.144	92.2	2445	26.5	28.60%	3145	34.1	7.90%	3392	36.8	-12.20%	2,977	32.3	-1.30%	-13.40%	-6.60%	2,938	31.9		
3121	Sacred Heart	0.258	165.1	2592	15.7	-3.70%	2495	15.1	29.10%	3221	19.5	-3.40%	3,112	18.8	1.20%	-2.20%	26.20%	3,149	19.1		
3122	Sacred Heart	1.161	743	4510	6.1	-7.60%	4165	5.6	14.70%	4776	6.4	-0.70%	4,741	6.4	-9.10%	-9.80%	3.50%	4,309	5.8		
3123	South Lowell	1.253	801.9	4264	5.3	2.90%	4388	5.5	14.00%	5003	6.2	0.40%	5,023	6.3	-1.80%	-1.40%	12.40%	4,931	6.1		
3124	L. Belvidere	0.163	104.3	2570	24.6	-17.90%	2109	20.2	23.20%	2598	24.9	-7.40%	2,405	23.1	-2.10%	-9.40%	11.60%	2,354	22.6		
3125	Belvidere	1.529	978.6	8735	8.9	1.80%	8895	9.1	-0.90%	8819	9	-3.70%	8,496	8.7	-0.80%	-4.50%	-5.30%	8,424	8.6		
3883*	Acre	0.282	180.5	4086	22.6	9.80%	4486	24.9	25.00%	5606	31.1	-7.00%	5211	28.9	4.00%	-3.30%	20.80%	5,420	30		
City of Lowell				13,778	8817.9	94,239	10.7	-1.90%	92,418	10.5	11.90%	103,458	11.7	1.70%	105,167	11.9	1.30%	3.00%	15.30%	106,519	12.1

*note: A change was made to the Census tracts within the City of Lowell for the 2010 Census. Census tracts 3108 and 3110 (in the Acre) were combined into a single Census tract: 3883.

Source: US Census, 1970-2010

2.2 RACE & MINORITY TRENDS

The most predominate changes in the city's population have been in the racial and ethnic composition of the population. In the past thirty years, minority populations in Lowell have increased from 7.5% to 57% of the total population. All races have experienced substantial growth except White populations, which decreased by 27.5% since 1980. Increasing populations since 1980 include Hispanic (+301%), Black (+500%), Other (+572%), and the largest increase, Asian (+3,461.8%).

The dramatic increase in the Asian populations, primarily from Cambodia and other Southeast Asian nations, has occurred between 1980 to 2010. Although Asian populations have grown throughout the City, they are most heavily concentrated in the Lower Highlands (currently 51% Asian) and the Census Tracts adjacent to this neighborhood. Today the residents of Asian descent in these areas formulate a distinct community in Lowell. Smaller Asian populations inhabit approximately 15% to 40% of Back Central, the Highlands, Pawtucketville, and Sacred Heart. Belvidere, Downtown, Centralville, Pawtucket and South Lowell house the smallest Asian populations that range from 4% to 15%. The growing Asian population has and will continue to change the composition of Lowell and diversify the community with new culture and traditions.

Similar to national trends, Hispanic populations are growing considerably in the city. Various neighborhoods house high Hispanic populations, including the Acre (31%), portions of Centralville closest to the Acre (34.6%) and Lower Belvidere (41.2%). The Highlands and Belvidere have the lowest Hispanic populations ranging from 7% to 14%.

Black populations are slightly increasing and reside throughout the city, with the lowest percentage in Belvidere (2.5%) and highest percentage in Downtown (11.5%). Projected populations show little significant change from previous growth rates.

The City's White population, the only group with decreasing population, remains the major racial group in Lowell (60.3%). In the past ten years, neighborhoods that have shown the largest decrease in white populations are the Lower Highlands, Highlands, and the Acre, which are the same neighborhoods that have accommodated the large minority populations. Areas that still contain large White majorities include Pawtucketville (73%), South Lowell (78%), and Belvidere (90%). Since 2000, the Downtown Census Tract has experienced a significant increase in its White population due to the extensive market-rate residential development that has occurred during this time frame.

Table 2-3: Lowell Minority Population Trends, 1980-2010

TRACT	Neighborhood	1980 POP	1980 Minority	1980 % Minor.	1980-90 Change	1990 POP	1990 Minority	1990 % Minor.	1990-00 Change	2000 POP	2000 Minority	2000 % Minor.	1980-10 Change	1990-10 Change	2000-10 Change	2010 POP	2010 Minority	2010 % Minor.
3101	Downtown	1902	560	29.40%	42.50%	3340	1401	41.90%	24.80%	3,881	2032	52.40%	461.30%	124.30%	54.70%	5,267	3143	59.70%
3102	Christian Hill	5873	107	1.80%	299.80%	6137	447	7.30%	170.30%	6,070	1195	19.70%	2564.50%	537.80%	138.60%	5,976	2851	47.70%
3103	Centralville	5463	99	1.80%	391.30%	5695	507	8.90%	240.10%	6,157	1864	30.30%	3382.80%	580.10%	85.00%	6,016	3448	57.30%
3104	Centralville	3233	138	4.30%	540.00%	3540	967	27.30%	60.40%	3,581	1569	43.80%	1705.10%	157.60%	58.80%	3,245	2491	76.80%
3105	Pawtucketville	3236	99	3.10%	198.40%	3396	310	9.10%	147.30%	3,353	757	22.60%	1373.70%	370.60%	92.70%	3,449	1459	42.30%
3106	Pawtucketville	9012	236	2.60%	258.50%	10450	981	9.40%	108.60%	11,002	2154	19.60%	1665.70%	324.80%	93.50%	11,571	4167	36.00%
3107	Acre	3864	144	3.70%	546.80%	4207	1014	24.10%	77.10%	4,575	1953	42.70%	1948.60%	190.90%	51.00%	4,441	2950	66.40%
3108	Acre	2523	444	17.60%	61.80%	2679	763	28.50%	49.80%	2,457	1048	42.70%	n/a	n/a	n/a	n/a	n/a	n/a
3110	Acre	1963	359	18.30%	216.30%	2927	1693	57.80%	19.90%	2,754	1910	69.40%	n/a	n/a	n/a	n/a	n/a	n/a
3111	Acre	2008	477	23.80%	178.00%	2991	1975	66.00%	22.20%	2,286	1845	80.70%	389.90%	18.30%	26.70%	2,410	2337	97.00%
3112	L. Highlands	2839	274	9.70%	462.70%	3195	1735	54.30%	34.20%	3,374	2459	72.90%	963.10%	67.90%	18.50%	3,267	2913	89.20%
3113	Highlands	3581	90	2.50%	671.10%	3519	682	19.40%	137.00%	3,954	1816	45.90%	2991.10%	307.90%	53.20%	4,057	2782	68.60%
3114	Highlands	4782	327	6.80%	254.10%	5394	1306	24.20%	90.50%	5,857	2702	46.10%	1067.60%	192.30%	41.30%	5,986	3818	63.80%
3115	Highlands	2664	33	1.20%	477.50%	2684	192	7.20%	370.60%	2,908	979	33.70%	4903.00%	759.90%	68.60%	2,974	1651	55.50%
3116	Highlands	5020	113	2.30%	402.10%	4911	555	11.30%	140.90%	5,099	1388	27.20%	2095.60%	347.00%	78.70%	5,295	2481	46.90%
3117	L. Highlands	3897	163	4.20%	385.80%	4375	889	20.30%	143.70%	4,923	2438	49.50%	2291.40%	338.50%	59.90%	5,098	3898	76.50%
3118	L. Highlands	2854	373	13.10%	202.00%	3324	1312	39.50%	72.10%	3,516	2389	67.90%	724.10%	134.30%	28.70%	3,513	3074	87.50%
3119	Back Central	2507	740	29.50%	38.20%	2885	1177	40.80%	12.70%	2,666	1226	46.00%	109.90%	31.90%	26.70%	2,429	1553	63.90%
3120	Back Central	3145	444	14.10%	156.90%	3392	1230	36.30%	31.50%	2,977	1420	47.70%	331.30%	55.70%	34.90%	2,938	1915	65.20%
3121	Sacred Heart	2495	259	10.40%	207.10%	3221	1027	31.90%	39.50%	3,112	1384	44.50%	722.40%	107.40%	53.90%	3,149	2130	67.60%
3122	Sacred Heart	4165	714	17.10%	62.80%	4776	1333	27.90%	36.90%	4,741	1812	38.20%	218.50%	70.60%	25.50%	4,309	2274	52.80%
3123	South Lowell	4388	84	1.90%	286.30%	5003	370	7.40%	101.40%	5,023	748	14.90%	1796.40%	330.50%	113.00%	4,931	1593	32.30%
3124	L. Belvidere	2109	414	19.60%	143.70%	2598	1243	47.80%	1.70%	2,405	1170	48.60%	365.70%	55.10%	64.80%	2,354	1928	81.90%
3125	Belvidere	8895	246	2.80%	139.00%	8819	583	6.60%	104.60%	8,496	1149	13.50%	687.80%	232.40%	68.70%	8,424	1938	23.00%
3883	Acre	4,486	803	17.90%	205.90%	5,606	2,456	43.80%	20.40%	5,211	2,958	56.80%	383.30%	58.00%	31.20%	5,420	3881	71.60%
City of Lowell		92,418	6,937	7.50%	205.10%	103,458	23,692	22.90%	63.60%	105,167	39,407	37.50%	774.66%	349.60%	53.97%	106,519	60,675	57.00%

*note: A change was made to the Census tracts within the City of Lowell for the 2010 Census. Census tracts 3108 and 3110 (in the Acre) were combined into a single Census tract: 3883.

Source: US Census, 1980-2010

Table 2-4: Change in Minority Population by Group in Lowell (1990-2010)								
Total Pop.	White	Minority					Hispanic	Total Minority
		Black	American Indian	Asian	Pacific Islander	Other or Multiple Races		
2010								
106,519	64,240 60.30%	7,238 6.80%	292 0.30%	21,513 20.20%	44 0.00%	13,192 12.40%	18,396 17.30%	60,675 57.0%
2000								
105,167	65,760 62.50%	3,644 3.50%	170 0.20%	17,302 16.50%	12 0.00%	3,545 0.50%	14,734 14.00%	39,407 37.5%
1990								
103,458	79,766 77.10%	1,839 1.80%	92 0.10%	11,419 11.00%	N/A	N/A	10,089 9.80%	23,692 22.90%
% change since 2000								
1.30%	-2.30%	98.60%	71.80%	24.30%	266.70%	272%	24.85%	54.0%

Source: US Census, 1990-2010

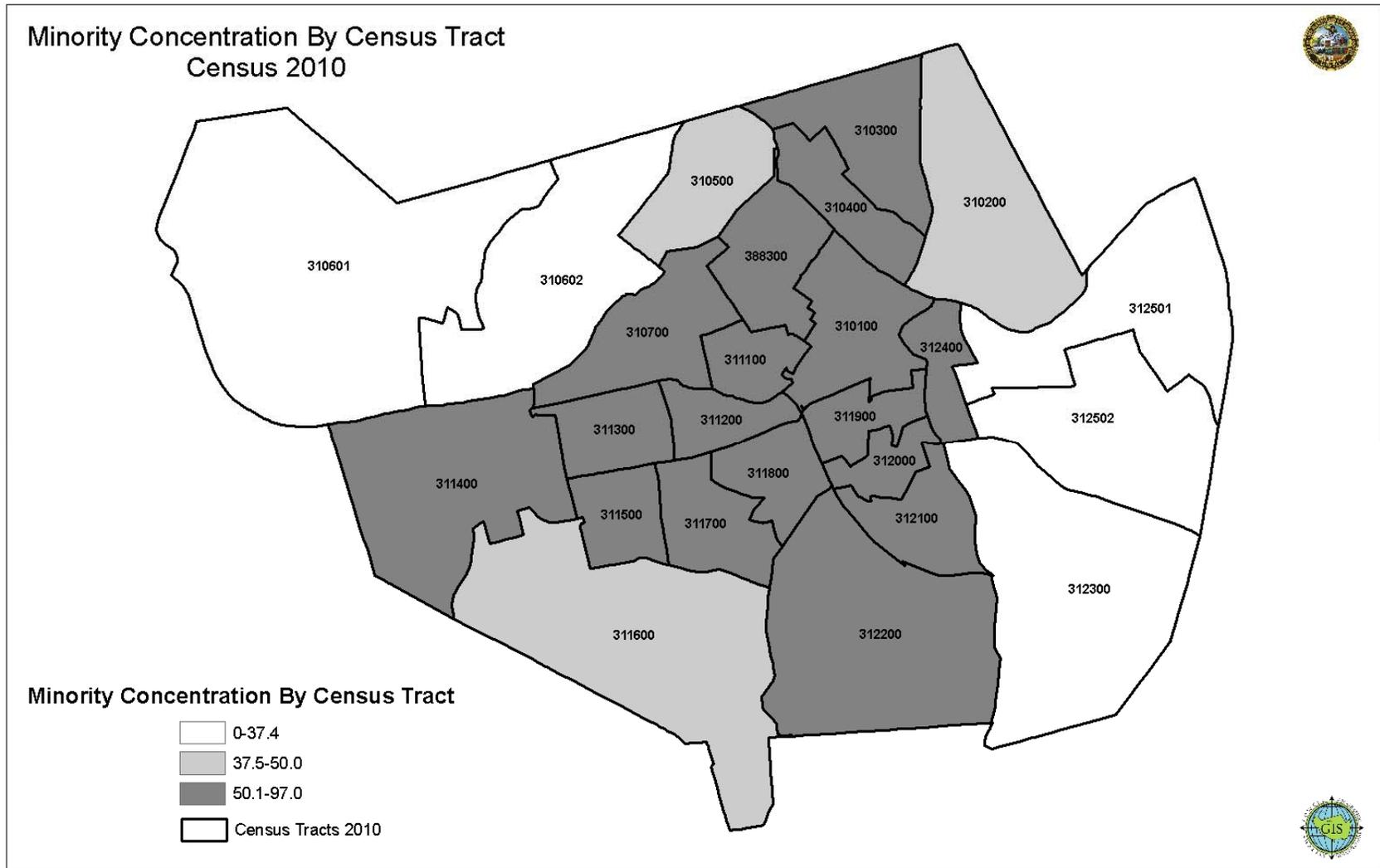
2.2.1 AREAS OF MINORITY CONCENTRATION

According to 2010 Census data, every Census Tract in the City has witnessed an increase in minority population since 2000 (see Table 2-3). Census Tracts with the highest concentrations of minority populations are located in the Acre (CT 3111) and the Lower Highlands (CTs 2839 & 2854). Census Tracts with the lowest concentrations of minorities are located on the peripheral of the city, in the Pawtucketville, Belvidere and South Lowell neighborhoods. The distribution of minority concentrations by Census Tract is illustrated in Map 2-1.

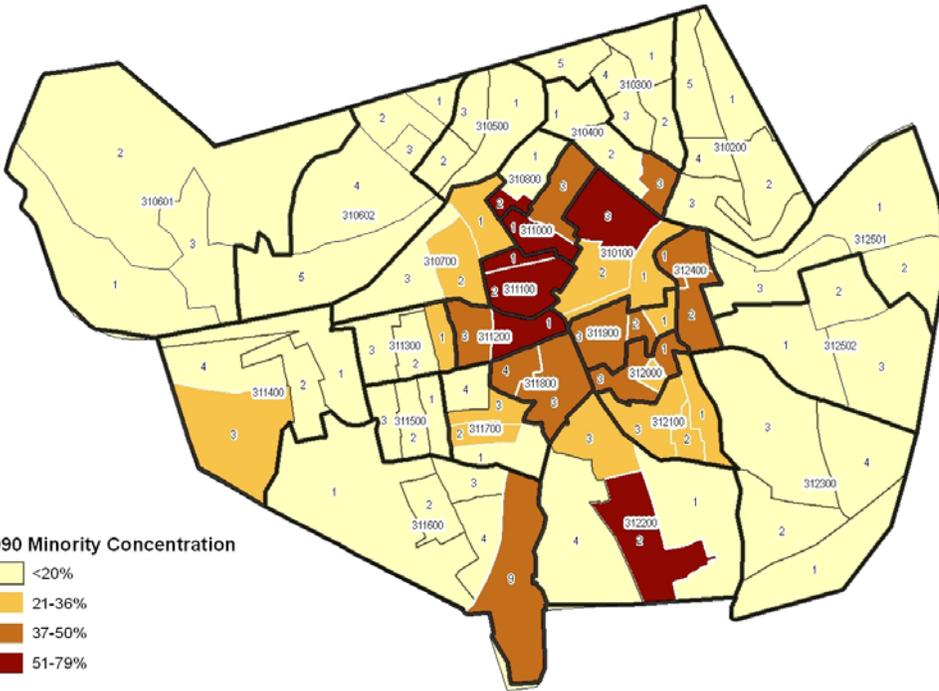
On a more detailed scale, Block Group data from the 2000 Census (2010 Block Group data not yet available) indicates that block groups with the highest concentrations of minorities are located in the City's center, and along its southern and western boundaries. This pattern is illustrated for both 1990 and 2000 on Maps 2-2 and 2-3. Trends indicate that 2010 Block Group data will reveal an increase in minority populations in many of the block groups throughout the city.

All data indicates that the City of Lowell's minority population continues to vastly outnumber accompanying populations in surrounding towns.

MAP 2-1

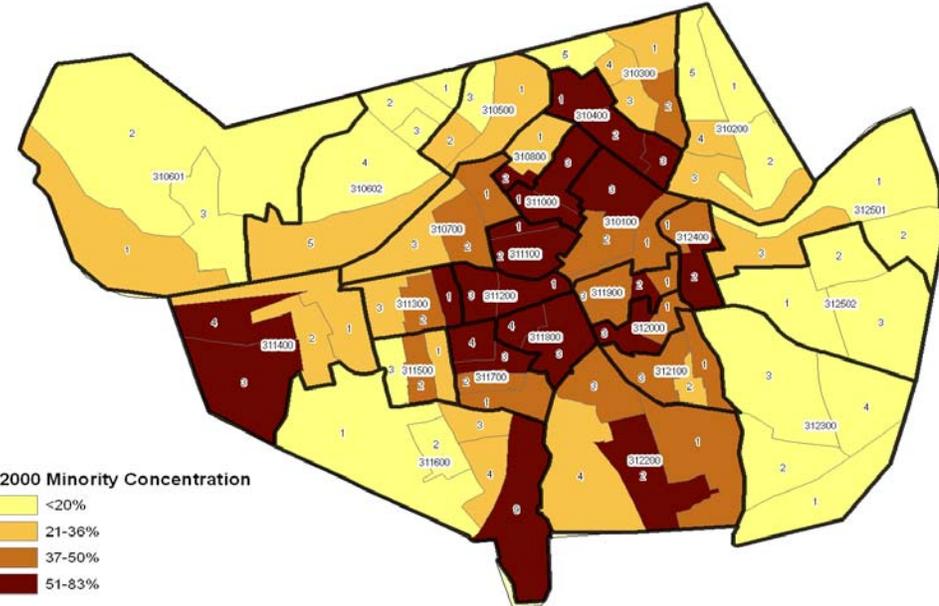


MAP 2-2 1990 Minority Concentration by Block Group



Source: U.S. Census and City of Lowell, DPD

MAP 2-3 2000 Minority Concentration by Block Group



Source: U.S. Census and City of Lowell, DPD

2.3 INCOME DATA

Note: At the time of the release of this report, income data from the 2010 Census is not yet available. To supplement, American Community Survey (ACS) data has been included to update the 2000 Census data. ACS Estimates are used to produce general fact sheets on communities with populations greater than 20,000 and are based on data collected over several years. The estimates represent the average characteristics of populations between January 2005 and December 2009 and do not represent a single point in time.

According to 2009 American Community Survey data, Lowell's Median Household Income is currently \$49,816 (1999 dollars), up 27% from \$39,192 in 1999. In comparison, Median Household income in the state of Massachusetts is currently estimated at \$64,496, also up 27% from \$50,955 in 1999. Average per capita income in Lowell is currently estimated at \$22,831 compared to \$25,952 on the state-wide level. The same ACS data also indicates that as of 2009, 13.5% of individuals are below the poverty line in Lowell, compared to 6.7% for the state of Massachusetts.

Lowell's Median Household Income remains significantly lower than that of surrounding towns in the area. Table 2-5 illustrates this disparity between Lowell and surrounding communities as of 2009.

Town	1999	2009	% Change
Billerica	\$67,799	\$87,048	28%
Chelmsford	\$70,207	\$89,022	27%
Dracut	\$57,676	\$71,480	24%
Dunstable	\$86,633	\$109,333	26%
Groton	\$82,869	\$118,041	42%
Lowell	\$39,192	\$49,816	27%
Pepperell	\$65,163	\$88,185	35%
Tewksbury	\$68,800	\$83,709	22%
Tyngsborough	\$69,818	\$98,413	41%
Westford	\$98,272	\$119,051	21%

Source: 2000 Census & 2009 American Community Survey

2.3.1 AREAS OF LOW-INCOME CONCENTRATION

Table 2-6 provides income data for each of Lowell's Census Tracts in 2000. This table indicates that the largest percentages of residents living below poverty level are located in the Acre and Downtown neighborhoods. For a more detailed perspective, Table 2-7 lists block groups with concentrations of low-moderate income residents ($\geq 51\%$ low-mod). While these block groups are located throughout the city, Map 2-4 illustrates that many of these block groups are concentrated near the center of Lowell. While 2010 income data on the Census Tract and Block group level is not yet available, the development of new market-rate housing in Downtown since 2000 is projected to off-set the concentration of low-moderate income residents in this area.

Table 2-6: Income by Census Tract in Lowell, 2000

Census Tract	Total Population	Per Capita Income	Total Households	Median Income per Household	Total Families	Median Income per Family	Total Below Poverty Level	% Below Poverty	% Minority
3101.00	3,881	\$15,424	1,925	\$18,468	750	\$21,125	1,283	33.1%	52%
3102.00	6,070	\$17,960	2,205	\$45,343	1,481	\$49,969	658	11.2%	20%
3103.00	6,157	\$16,969	2,344	\$40,391	1,518	\$42,302	997	16.3%	30%
3104.00	3,581	\$12,281	1,156	\$28,456	825	\$28,854	902	25.4%	44%
3105.00	3,353	\$16,668	1,184	\$40,965	745	\$50,705	439	14.0%	23%
3106.01	5,392	\$21,127	1,923	\$50,734	1,282	\$67,705	289	5.8%	22%
3106.02	5,610	\$20,897	2,226	\$45,136	1,455	\$52,795	236	4.3%	17%
3107.00	4,516	\$16,273	1,512	\$32,500	795	\$34,107	877	21.6%	43%
3108.00	2,516	\$7,137	348	\$29,079	276	\$28,696	385	35.8%	43%
3110.00	2,576	\$7,065	1,157	\$9,895	522	\$14,390	1,377	54.6%	69%
3111.00	2,464	\$9,970	633	\$33,831	506	\$27,237	809	32.9%	81%
3112.00	3,374	\$12,352	1,079	\$29,420	674	\$33,043	986	29.2%	73%
3113.00	3,954	\$16,075	1,326	\$38,833	859	\$46,350	459	11.9%	46%
3114.00	5,857	\$23,379	2,331	\$46,929	1,449	\$50,160	557	9.7%	46%
3115.00	2,908	\$20,494	1,039	\$51,458	687	\$58,438	199	6.9%	34%
3116.00	5,099	\$21,157	1,872	\$46,111	1,357	\$52,146	694	13.6%	27%
3117.00	4,923	\$15,315	1,559	\$44,306	1,126	\$47,025	736	15.0%	50%
3118.00	3,516	\$11,546	973	\$36,772	778	\$37,959	595	17.1%	68%
3119.00	2,666	\$13,169	1,132	\$18,929	524	\$29,423	922	34.8%	46%
3120.00	2,977	\$12,914	975	\$28,528	726	\$33,839	939	31.7%	48%
3121.00	3,112	\$14,740	1,098	\$35,583	716	\$39,828	527	17.1%	44%
3122.00	4,741	\$18,207	1,755	\$43,144	1,162	\$42,845	775	16.3%	38%
3123.00	5,004	\$19,891	1,982	\$45,098	1,222	\$51,786	368	7.5%	15%
3124.00	2,424	\$12,868	946	\$25,417	562	\$32,339	548	22.7%	49%
3125.01	4,497	\$26,796	1,670	\$61,429	1,185	\$75,149	310	6.9%	17%
3125.02	3,999	\$31,308	1,642	\$58,819	1,065	\$72,419	199	5.0%	10%
Total/ Avg.	105,167	\$16,614	37,992	\$37,906	24,247	\$43,101	17,066	16.8%	66%

Source: Census, 2000

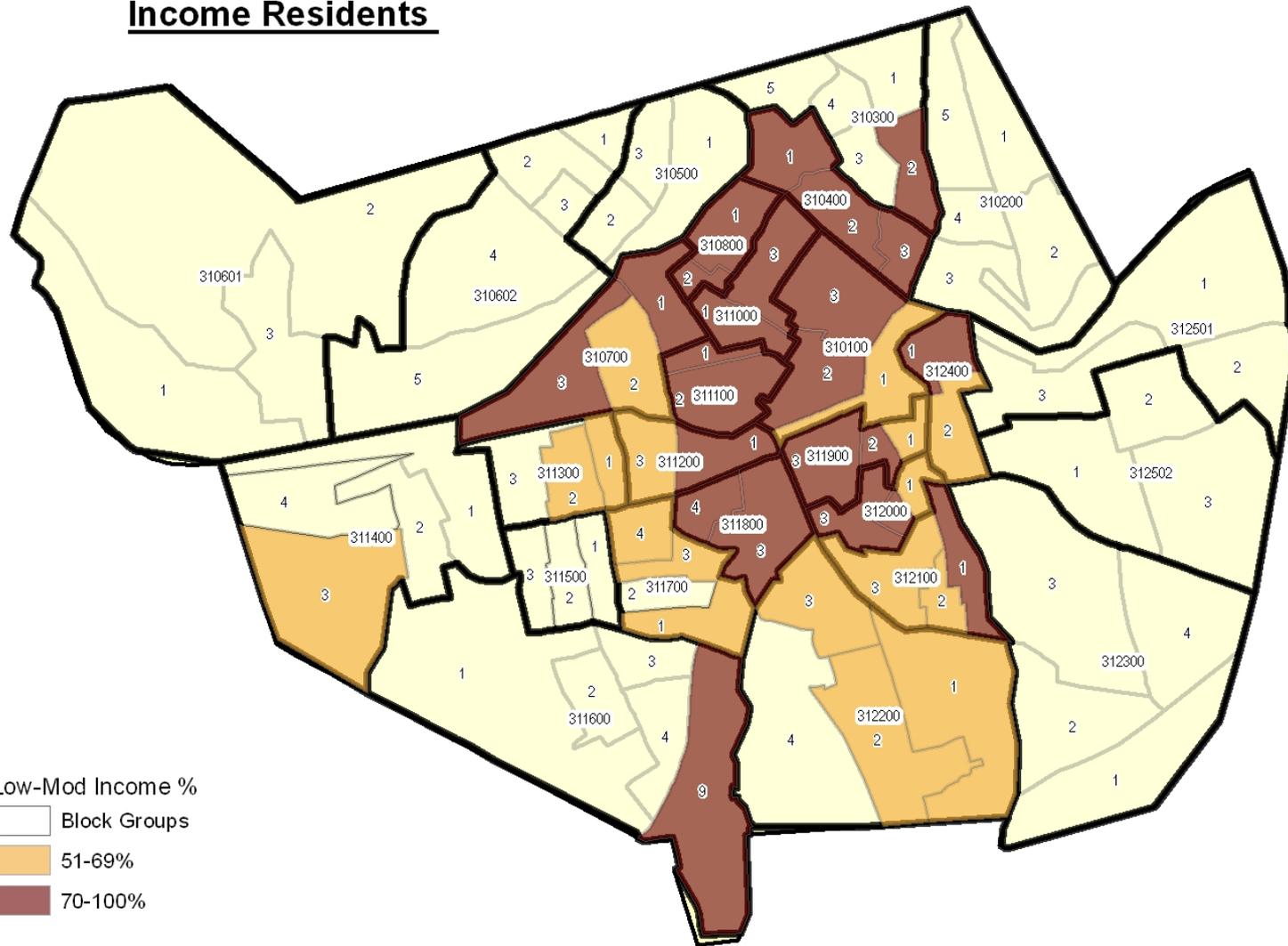
Table 2-7: Lowell Block Groups with High Concentration of Low and Moderate Income Households

Census Tract	Block Group	Neighborhood	Total Households	% Low-Mod Income
311000	1	Acre	700	97%
310100	3	Downtown	648	91%
312400	1	Lower Bevidere	345	91%
311900	3	Back Central	669	87%
310100	2	Downtown	750	83%
311000	3	Acre	508	83%
311200	1	Lower Highlands	542	83%
310400	3	Centralville	428	79%
310800	2	Acre	251	79%
311600	9	Highlands	365	79%
311100	1	Acre	266	78%
310800	1	Acre	94	77%
310300	2	Centralville	612	76%
311800	3	Lower Highlands	474	76%
311900	2	Back Central	276	76%
312100	1	South Lowell	446	76%
310400	1	Centralville	332	75%
312000	2	Back Central	200	74%
310700	1	Acre	691	73%
310700	3	Acre	282	73%
310400	2	Centralville	397	72%
311800	4	Lower Highlands	503	72%
312000	3	Back Central	505	72%
311100	2	Acre	308	70%
312400	2	Lower Bevidere	596	69%
311300	2	Lower Highlands	518	68%
312200	2	Ayers City	349	68%
310100	1	Downtown	532	66%
312200	3	Ayers City	279	65%
311700	4	Lower Highlands	537	64%
312100	2	South Lowell	326	64%
311700	3	Lower Highlands	355	63%
311900	1	Back Central	186	63%
310700	2	Acre	545	62%
311200	3	Lower Highlands	532	62%
311300	1	Lower Highlands	406	59%
312000	1	Back Central	265	56%
311400	3	Highlands	892	55%
312100	3	South Lowell	322	53%
311700	1	Lower Highlands	317	52%
312200	1	Ayers City	768	52%
311700	2	Lower Highlands	347	51%

Source: US Census, 2000

Note: Census Tracts in bold indicate areas of high concentration of both low-income households and minority populations.

Map 2-4 Block Groups with High Concentration of Low to Moderate Income Residents



Source: U.S. Census and City of Lowell, DPD

2000 Census

2.4 EMPLOYMENT DATA

According to the Massachusetts Division of Employment and Training, Lowell's unemployment rate has increased steadily from 3.1% in 2000 to a staggering 10.3% in December 2010. The current unemployment rate in Lowell is higher than both the state and national rates. Please refer to Table 2-8 for further details on the unemployment rates for both Lowell and the state of Massachusetts over the past two decades.

Year	Labor Force	Employment	Unemployment	Unemployment Rate	Statewide Rate
1990	52,174	47,682	4,492	8.6%	6.3%
1991	51,128	44,970	6,158	12.0%	8.8%
1992	50,025	43,525	6,500	13.0%	8.8%
1993	47,625	42,549	5,076	10.7%	7.3%
1994	46,036	42,059	3,977	8.6%	6.2%
1995	47,868	44,598	3,270	6.8%	5.5%
1996	48,300	45,812	2,488	5.2%	4.6%
1997	50,090	47,490	2,600	5.2%	4.1%
1998	50,777	48,476	2,301	4.5%	3.4%
1999	51,896	49,646	2,250	4.3%	3.3%
2000	51,122	49,514	1,608	3.1%	2.7%
2001	52,246	49,469	2,777	5.3%	3.7%
2002	52,319	48,309	4,010	7.7%	5.3%
2003	51,501	47,359	4,142	8.0%	5.8%
2004	50,366	46,814	3,552	7.1%	5.2%
2005	50,134	46,901	3,233	6.4%	4.8%
2006	49,883	46,925	2,958	5.9%	4.7%
2007	49,843	47,097	2,746	5.5%	4.4%
2008	50,446	46,998	3,448	6.8%	5.3%
2009	51,160	45,424	5,736	11.2%	8.4%
2010	51,611	46,278	5,333	10.3%	8.00%

Source: Massachusetts Executive Office of Labor and Workforce Development
Division of Unemployment Assistance

Table 2-9 compares Lowell's unemployment rate in December 2010 with that of other large Massachusetts towns. As the data indicates, Lowell's unemployment rate is the 6th highest among the thirteen communities.

Municipality	Unemployment Rate	Municipality	Unemployment Rate
<i>Massachusetts</i>	8.0%	Worcester	9.4%
Cambridge	5.1%	Lowell	10.3%
Newton	5.4%	Brockton	10.7%
Somerville	5.7%	Springfield	13.4%
Quincy	7.3%	Fall River	13.8%
Boston	7.5%	New Bedford	14.0%
Lynn	9.3%	Lawrence	17.6%

Source: Massachusetts Executive Office of Labor and Workforce Development Division of Unemployment Assistance

2.4.1 EMPLOYMENT CENTERS

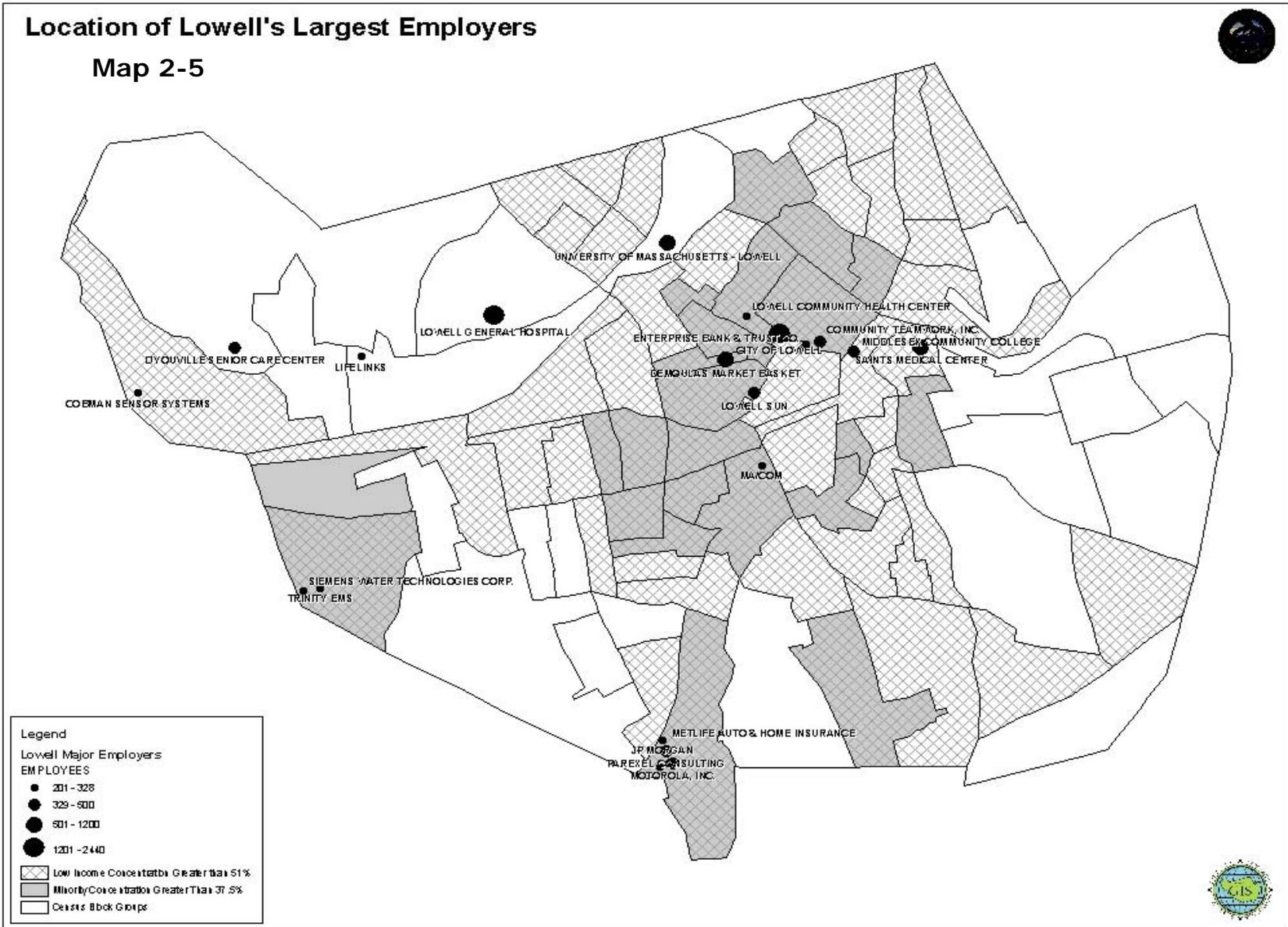
The City of Lowell caters to a multiple skilled workforce with a range of job sectors including high tech, education, medicine, and industry. The City's major employers are included in Table 2-10 below. The distribution of these employers throughout Lowell is illustrated on Map 2-5. As illustrated on the map, all but 4 of these major employers (80%) are located in Block Groups with high concentrations of low/moderate income populations. Ancillary service employers in these areas add to the total number of jobs offered for a wide range of skilled and unskilled employees.

Lowell Top Employers	Location	# of Employees
City of Lowell	375 Merrimack St.	2,440
Lowell General Hospital	295 Varnum Ave.	1,940
Saints Medical Center	1 Hospital Drive	1,200
University of Massachusetts - Lowell	1 University Ave	1,080
DeMoulas Market Basket	331 Fletcher St.	800
Middlesex Community College	33 Kearney Square	500
Motorola, Inc.	900 Chelmsford St.	458
Parexel Consulting	900 Chelmsford St.	450
Community Teamwork, Inc.	155 Merrimack Street	440
D'Youville Senior Care Center	981 Varnum Ave.	361
Lowell Sun	491 Dutton St.	350
Cobman Sensor Systems	1001 Pawtucket Boulevard	328
Lowell Community Health Center	585-597 Merrimack Street	312
MA/COM	100 Chelmsford St.	300
JP Morgan	900 Chelmsford St.	280
Siemens Water Technologies Corp.	10 Technology Drive	250
Metlife Auto & Home Insurance	900 Chelmsford St.	225
LifeLinks	145 Lexington Ave	216
Trinity EMS	1221 Westford St	204
Enterprise Bank & Trust Co.	222 Merrimack St.	201

Source: City of Lowell, Department of Planning and Development: March 2011

Location of Lowell's Largest Employers

Map 2-5



Source: City of Lowell, Department of Planning and Development

2.5 HOUSING PROFILE

The number of housing units in the City of Lowell has grown since 1990, most especially among ownership units. The 2010 Census documented 41,431 year-round housing units in the City of Lowell. Of these units, nearly 93% are occupied and just over half are homeownership units.

	1990		2000		2010	
	Number	Percent	Number	Percent	Number	Percent
Total No. of Units	40,302		39,468		41,431	
Total No. of Occupied Units	37,019	91.0%	37,887	96.0%	38,470	92.9%
Ownership Units	15,508	41.0%	16,309	43.0%	17,385	45.2%
Rental Units	21,511	58.1%	21,578	57.0%	21,085	54.8%

Source: U.S. Census Bureau, 1990 Census, 2000 Census, 2010 Census

Table 2-12 displays Lowell's housing statistics by neighborhood and Census Tract in 2000 and 2010. The percentage of occupied units dropped between 2000 and 2010 by approximately 3%. Currently the highest incidences of vacant units among Lowell's neighborhoods occur in the Centralville, Lower Highlands, and Back Central neighborhoods. These neighborhoods saw the highest incidences of home foreclosures in the City during the national foreclosure crisis which has likely contributed to these vacancy statistics.

Several common factors continue to characterize Census Tracts with low homeownership rates, including:

- Lack of single-family (1-4 units) structures
- Concentration of multi-unit (5-150 units) structures
- Concentration of subsidized housing

High concentration of business, industrial and multi-family zoning districts.

Table 2-12: Lowell Housing Occupancy by Census Tract, 2000-2010

		2011				2010			
Census Tract	Neighborhood	Total Housing Units	Occupied Housing Units	Vacant Housing Units	Percentage Occupied	Total Housing Units	Occupied Housing Units	Vacant Housing Units	Percentage Occupied
3101	Downtown	2,025	1,930	95	95.30%	2,858	2,599	259	90.90%
3102	Centralville	2,288	2,194	94	95.90%	2,283	2,113	170	92.60%
3103	Centralville	2,414	2,329	85	96.50%	2,447	2,277	170	93.10%
3104	Centralville	1,209	1,157	52	95.70%	1,208	1,067	141	88.30%
3105	Pawtucketville	1,223	1,172	51	95.80%	1,256	1,170	86	93.20%
3106.01	Pawtucketville	1,942	1,916	26	98.70%	2,112	2,058	54	97.40%
3106.02	Pawtucketville	2,284	2,212	72	96.80%	2,412	2,253	159	93.40%
3107	Acre	1,593	1,518	75	95.30%	1,628	1,458	170	89.60%
3108	Acre	361	345	16	95.60%	n/a	n/a	n/a	n/a
3110	Acre	1,235	1,208	27	97.80%	n/a	n/a	n/a	n/a
3111	Acre	636	574	62	90.30%	844	777	67	92.10%
3112	Lower Highlands	1,129	1,074	55	95.10%	1,133	1,043	90	92.10%
3113	Highlands	1,375	1,317	58	95.80%	1,407	1,290	117	91.70%
3114	Highlands	2,500	2,338	162	93.50%	2,512	2,331	181	92.80%
3115	Highlands	1,085	1,040	45	95.90%	1,092	1,011	81	92.60%
3116	Highlands	1,903	1,862	41	97.80%	1,922	1,844	78	95.90%
3117	Lower Highlands	1,627	1,556	71	95.60%	1,636	1,528	108	93.40%
3118	Lower Highlands	1,019	977	42	95.90%	1,058	979	79	92.50%
3119	Back Central	1,196	1,131	65	94.60%	1,169	1,077	92	92.10%
3120	Back Central	1,016	970	46	95.50%	1,059	969	90	91.50%
3121	Sacred Heart	1,140	1,094	46	96.00%	1,190	1,110	80	93.30%
3122	Sacred Heart	1,861	1,747	114	93.90%	1,697	1,616	81	95.20%
3123	South Lowell	2,036	1,990	46	97.70%	2,098	2,001	97	95.40%
3124	Lower Belvidere	978	941	37	96.20%	996	911	85	91.50%
3125.01	Belvidere	1,721	1,665	56	96.70%	1,791	1,712	79	95.60%
3125.02	Belvidere	1,672	1,630	42	97.50%	1,694	1,607	87	94.90%
3883	Acre	n/a	n/a	n/a	n/a	1,929	1,669	260	86.50%
City of Lowell		39,468	37,887	1,581	96.00%	41,431	38,470	2,961	92.90%

Source: US Census, 2000 & 2010; Note: Census Tracts 3108 and 3110 were combined to create 3883 in the 2010 Census

2.5.1 HOUSING MARKET CONDITIONS

The housing market in Lowell mirrors trends throughout the Commonwealth. The City saw a significant housing boom in the early 2000s with an increase in home prices and a strong market. The booming real estate market was also a source of economic development for the city as investors and developers began building in the City. The increased sale prices also reflected an influx of new residents with greater purchasing power that benefited Lowell’s neighborhoods and businesses. More recently however the market has seen a drop in both single family and condominium sales prices. A national foreclosure crisis coupled with high unemployment rates has significantly impacted the housing market.

The average sales price for both single-family homes and condominiums have decreased substantially in the past five years, according to data provided by the Banker & Tradesman in table 2-12. These figures indicate there was a 33% decrease in the value of a single family home from 2005-2009. Condominium sale prices fell 35% during the same time period.

Year	1-Family	Condo
2009*	\$185,000	\$126,125
2008	\$194,900	\$155,900
2007	\$251,000	\$175,000
2006	\$265,000	\$202,000
2005	\$274,900	\$193,500
2004	\$248,000	\$165,000
2003	\$218,000	\$144,900
2002	\$195,000	\$129,000
2001	\$170,000	\$104,900
2000	\$140,000	\$85,000
1995	\$80,000	\$34,000
1990	\$110,000	\$85,500

*Data available from January-June

Source: Banker and Tradesman

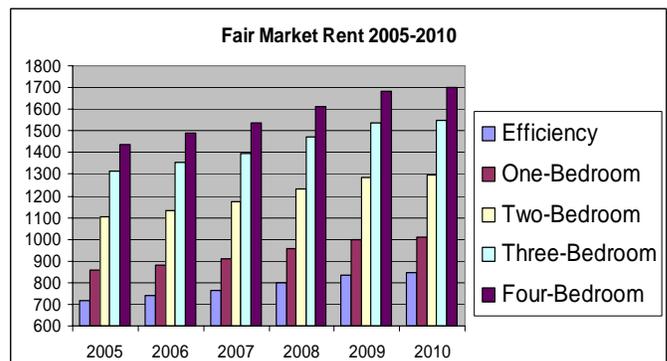
2.5.2 RENTAL MARKET CONDITIONS

The cost of renting an apartment has also skyrocketed as the city-wide rental vacancy rate of 1.8% limits supply. The average rent for a two-bedroom home in Lowell increased by approximately 18% from \$1,102 in 2005 to \$1,297 in 2010 according to HUD.

Based on the housing market, HUD allows the Lowell Housing Authority to spend between 90% and 110% of the Fair Market Rent on its Housing Choice Voucher Program. These payment standards, adopted by the LHA in October 2004, allow voucher recipients greater flexibility in finding housing. According to the LHA, as the rental market has softened within the last year, recipients have been more successful in finding apartments within the HUD Fair Market Rate structures. Table 2-14 and the accompanying chart show the rental rates reported by the Lowell Housing Authority as of December 2010.

Unit Size	Fair Market Rent		Percent Change	Payment Standard
	2005	2010		
Efficiency	\$715	\$843	18%	\$927
1 Bed	\$856	\$1,009	18%	\$1,110
2 Bed	\$1,102	\$1,297	18%	\$1,427
3 Bed	\$1,316	\$1,549	18%	\$1,704
4 Bed	\$1,437	\$1,699	18%	\$1,869

Source: US Dept of Housing & Urban Development



2.5.3 SUBSIDIZED HOUSING

According to the Massachusetts Department of Housing and Community Development's Subsidized Housing Inventory, updated in December 2010, 13.2% or 5,212 units of the City's total housing stock are affordable and qualify under the M.G.L. Ch40B inventory. Lowell is one of only 51 communities that have met the State's goal of 10% affordability under Chapter 40B. In addition, the Lowell Housing Authority and Community Teamwork Inc., a regional multi-service non-profit, manage 2,033 Section 8 Rental Vouchers in the City of Lowell. When these vouchers are factored in with the subsidized housing units, the total percentage of affordable housing in Lowell increases to 18%.

Since 2005, other communities in the Lowell, MA-NH PMSA have made progress in creating subsidized units. Table 2-15 provides a subsidized housing inventory for municipalities in Greater Lowell. This information is also depicted on Map 2-6. As the information shows, Lowell is providing more than 53% of the total affordable units in the PMSA. Lowell's affordable housing units are primarily sited in the City's center, as illustrated on Map 2-7. According to 2000 Census data, 62% of Lowell's total subsidized units are located in Census Tracts # 3110, 3101, 3119, 3111, where access to public transportation and other services are more accessible.

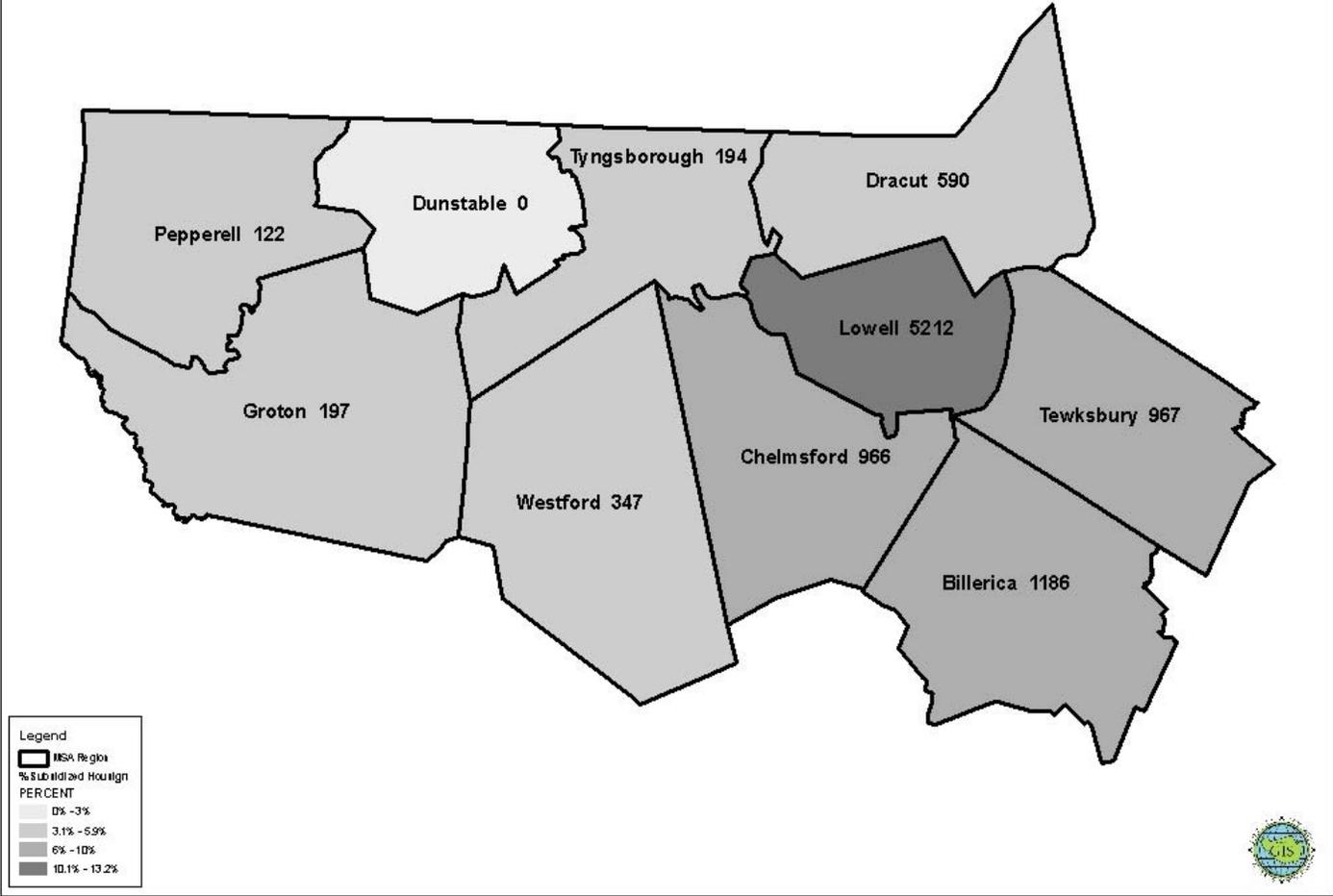
Community	Population (2000)	Total Housing Units (2000)	2005 Subsidized Housing		2010 Subsidized Housing		Percent Change (2005-2010)	Affordable Units Needed to Achieve 10%
			Number	Percent	Number	Percent		
Billerica	38,981	13,055	457	3.50%	1,186	9.10%	159.50%	120
Chelmsford	33,858	12,981	727	5.60%	966	7.40%	32.90%	332
Dracut	28,562	10,597	557	5.30%	590	5.60%	5.90%	470
Dunstable	2,829	933	0	0.00%	0	0.00%	0.00%	93
Groton	9,547	3,339	182	5.50%	197	5.90%	8.20%	137
Lowell	105,167	39,381	5,174	13.10%	5,212	13.20%	0.70%	0
Pepperell	11,142	3,905	117	3.00%	122	3.10%	4.30%	269
Tewksbury	28,851	10,125	449	4.40%	967	9.60%	115.40%	46
Tyngsborough	11,081	3,784	260	6.90%	194	5.10%	-25.40%	184
Westford	20,754	6,877	148	2.20%	347	5.00%	134.50%	341
TOTALS	290,772	104,977	8,071		9,781		21.20%	1991
Lowell % of Total	36.20%	37.50%	64.10%		53.3%			

Source: MA Department of Housing and Community Development, December 2010

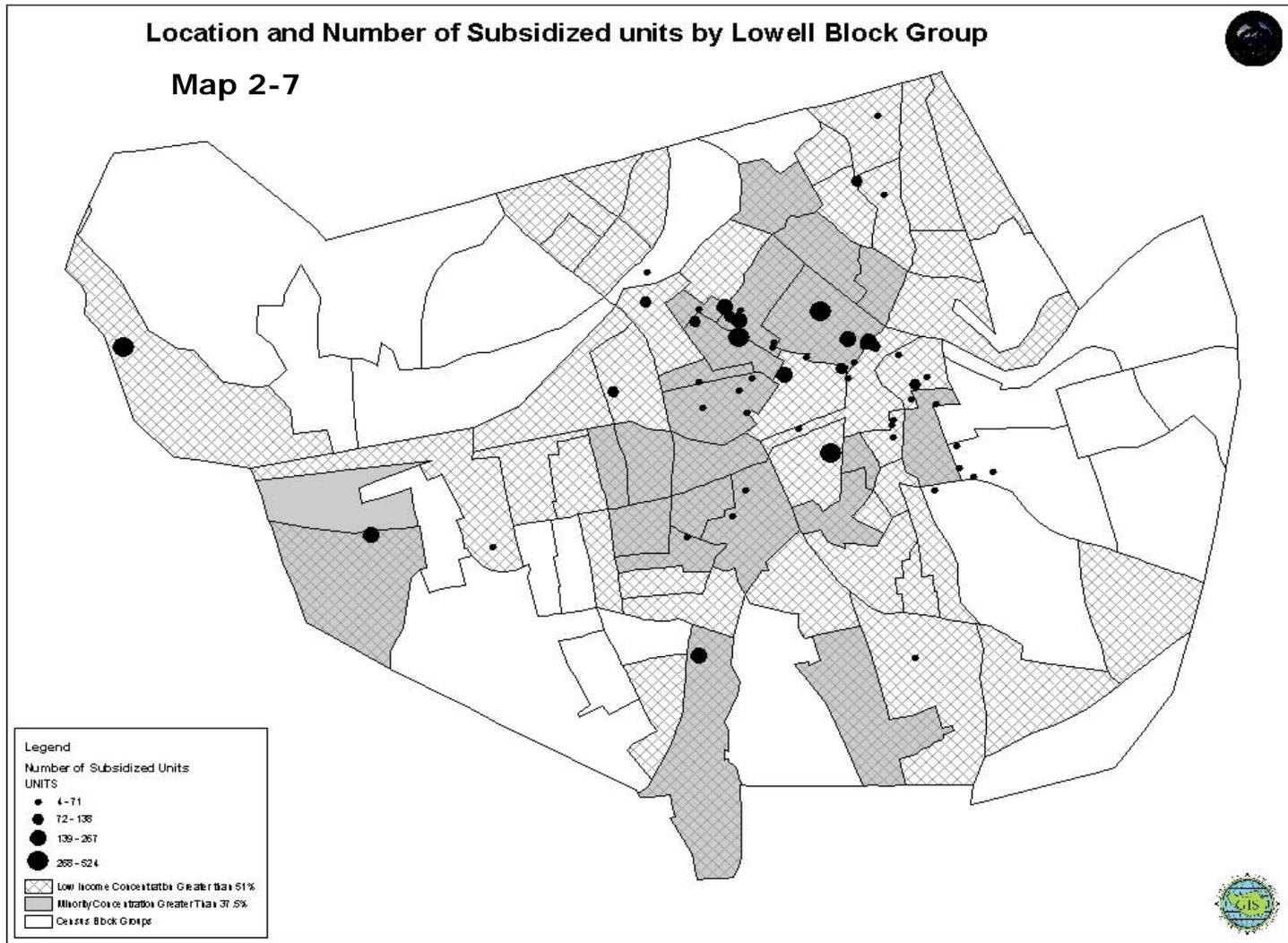
Note: Lowell, MA -NH PMSA Includes Pelham, NH. Pelham is not included in this data.

Subsidized Housing in Lowell's MSA Region

Map 2-6



Source: Department of Housing and Community Development, 2011



Source: Department of Housing and Community Development, 2011

Of the 5,212 total units of subsidized housing in Lowell, 1,896 are located in public housing developments. 984 of these units are reserved for elderly residents, while the remaining 912 are set-aside for families. A total of 69 units are handicapped accessible, of which 47 are located in elderly developments and 22 are located in family developments. Of the total public housing units in Lowell, 90% of the units are occupied. The vacancies are due to resident turnover and upgrading of units for new tenants. Detailed information is provided for each public housing development in Lowell in Table 2-16.

Table 2-16: Lowell Public Housing Units								
Housing Development	Total Units	Occupied Units	Type of Units	# Accessible Units	% White	% Hispanic	% Black	% Asian
Archie Kenefick Manor	42	41	Elderly	3	92.68%	4.88%	2.44%	0%
Bishop Markham Villiage	399	394	Elderly	28	51.52%	31.73%	5.33%	11.17%
Dewey Archambault Towers	189	188	Elderly	2	65.96%	14.89%	5.85%	12.77%
Fr. Morrisette Manor	57	57	Elderly	3	73.21%	17.86%	3.57%	5.36%
Fr. Norton Manor	112	113	Elderly	0	80.53%	10.62%	4.42%	3.54%
Francis Gatehouse Mill	90	87	Elderly	9	94.25%	3.45%	0%	2.30%
Lawrence- Faulkner St.	28	27	Elderly	1	96.30%	0%	0%	3.70%
Scattered Sites	67	66	Elderly	1	59.09%	25.76%	1.52%	13.64%
Total - Elderly	984	973		47				
705-1	23							
705-2 Dublin St (formerly Larange)	10	56	Family	0	32.14%	41.07%	12.50%	14.29%
705-3 Lane-Liberty-Walker St	32							
George W. Flannagan Villiage	169	166	Family	7	30.72%	46.39%	5.42%	16.87%
Harold Hartwell Crt.	27	25	Family	0	16.00%	64.00%	0%	20%
North Common Village	524	492	Family	10	19.31%	53.86%	3.66%	22.76%
Scattered Sites (3Community Residences)	-	-	Family	0	100%	0%	0%	0%
Scattered Sites	127	-	Family	5	22.73%	40.91%	0%	29.55%
Total- Family	912	739		22				
TOTAL	1896	1712		69				

Source: Lowell Housing Authority

2.6 OTHER RELEVANT DATA

2.6.1 FIRST TIME HOMEBUYERS

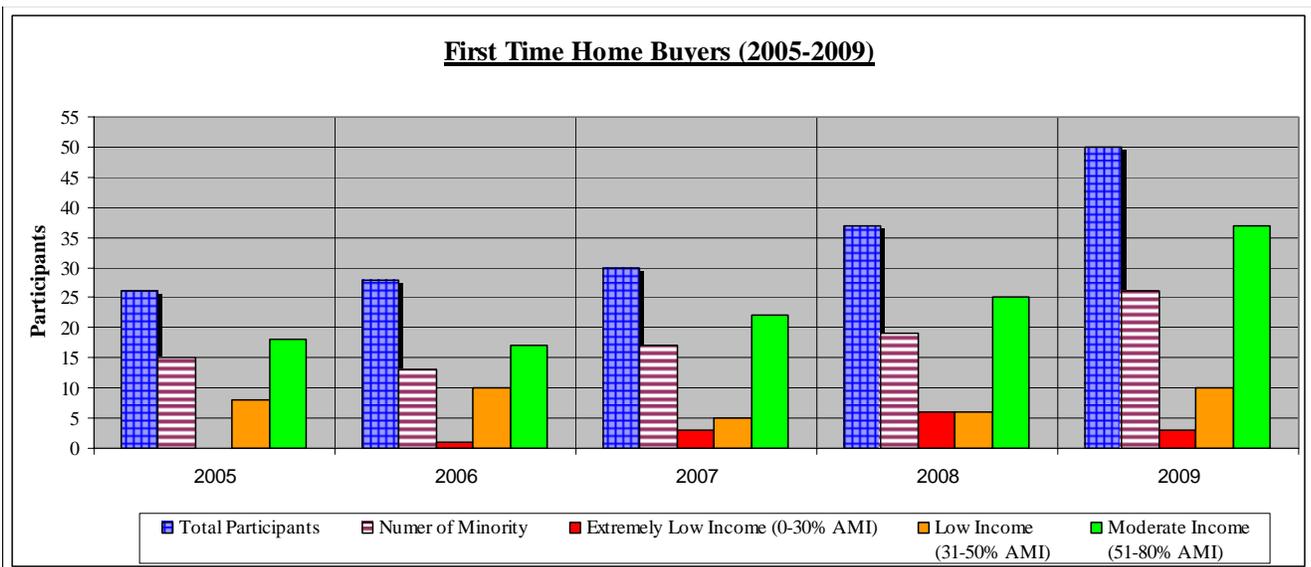
Lowell administers several programs aimed to assist low- and moderate-income households acquire and maintain housing, including a First Time Homebuyers Program. This program has built a strong partnership with the Merrimack Valley Housing Partnership, a local non-profit service agency that provides pre-purchase counseling to potential homebuyers. During a recent HUD monitoring of its program, no deficiencies were found and MVHP is listed among agencies participating in HUD’s Housing Counseling Program. Participating households in the FTHB program are required to have completed counseling through MVHP prior to applying to the City for downpayment assistance. This relationship has ensured that potential homebuyers are well informed of the home buying and mortgage process and has been key to the accomplishments of the City's program. Over 50% of the First Time Homebuyer participants are minority, a rate that is higher than the overall rate of minorities in the City as of 2010. Table 2 –16 and the accompanying chart below verifies that the rate of first time homebuyer assistance is distributed proportionately based on the overall minority rate in Lowell. The distribution of the households participating in the program is illustrated on Map 2-8.

In addition to the First Time Homebuyer program, the City of Lowell also operates a housing rehab program to provide the City’s low and moderate income residents with emergency assistance in maintaining their homes.

Table 2-17: Lowell FTHB Participants (2005-2009)

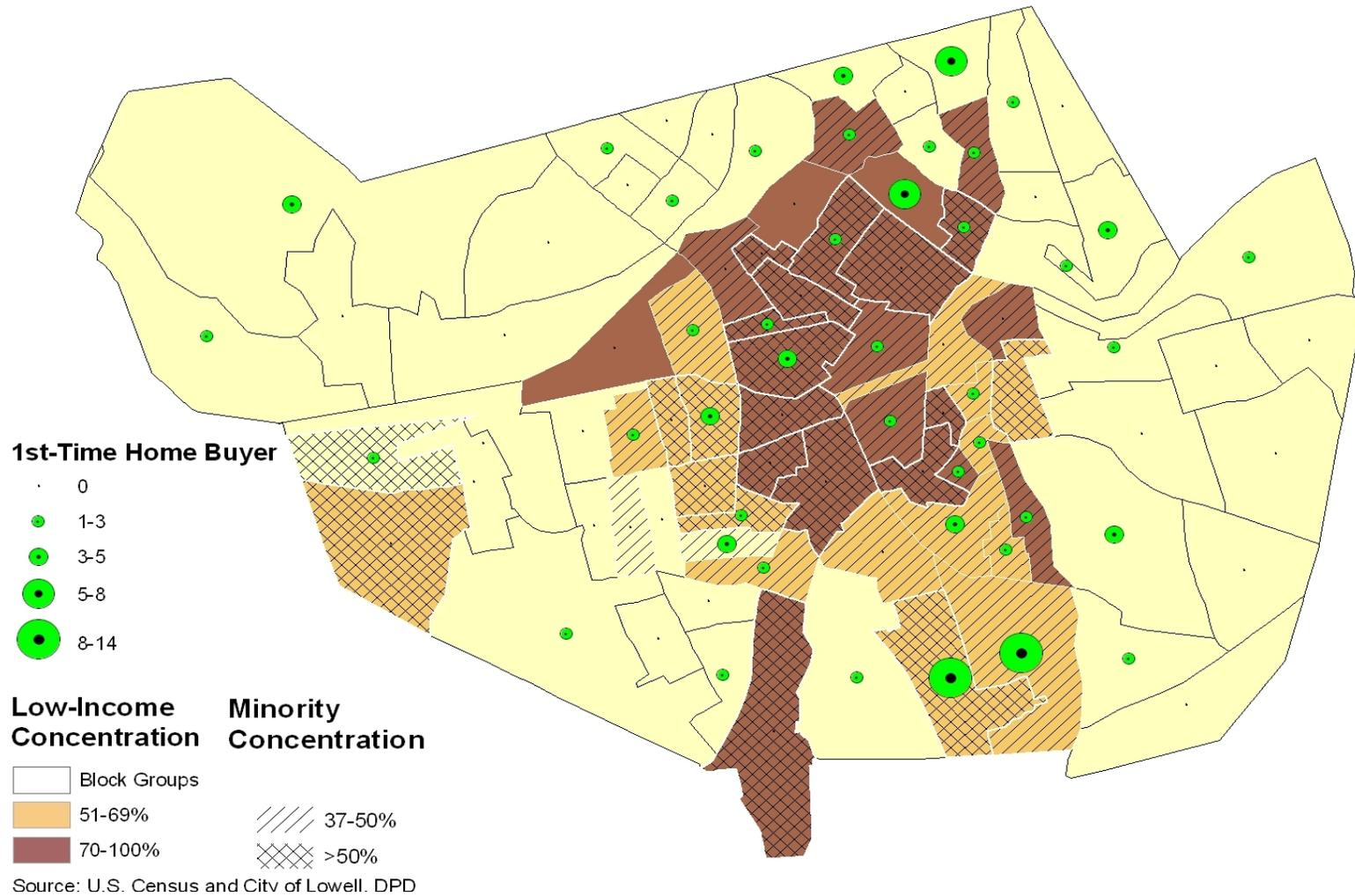
Program Year	Total Participants	Number of Minority	% Minority	Extremely Low Income (0-30% AMI)	Low Income (31-50% AMI)	Moderate Income (51-80% AMI)
2005	26	15	58%	0	8	18
2006	28	13	46%	1	10	17
2007	30	17	57%	3	5	22
2008	37	19	51%	6	6	25
2009	50	26	52%	3	10	37
Total:	171	90	53%	13	39	119

Source: City of Lowell, Department of Planning and Development



Map 2-8

First Time Home Buyers (2005-2009)



2.6.2 LEAD POISONING PREVENTION

Like many of the older densely populated cities of the Northeast, Lowell has a high rate of apartments that contain lead paint hazards because housing built before 1979 has a high probability of lead abatement needs. According to 2000 Census data, there are 34,230 housing units in Lowell built before 1979, comprising 87% of Lowell's housing inventory. 19,500 (57%) of these units are located in areas of the city with high concentrations of low-income and minority families. 48% of these units are rental units.

Due to the age of the housing stock and the relatively large number of low-income households, Lowell is a high-risk community for childhood lead poisoning. According to the MA Department of Public Health, over the past five years there have been 29 newly confirmed cases of children under six years old with elevated lead blood levels in Lowell. This figure translates to a rate of 1.1 cases per 1000 children in Lowell. In comparison, the State rate is .7/1000 children.

The adjusted rate of cases of children with elevated lead blood levels in Lowell—which factors in the percent of homes built before 1950 and households with low or moderate income—is 1.7 per 1000 children, which means Lowell has the 9th highest rate in the state. This information is provided in Table 2-17.

Rank	Community	5-Year Cases	Rate: Cases per 1000	% Low Income	% Structures pre-1950	Adjusted Rate	% Screened
1	New Bedford	45	1.8	58%	66%	4.5	95%
2	Lynn	44	1.8	47%	66%	3.6	89%
3	Chelsea	22	1.6	56%	60%	3.5	>99%
4	Somerville	19	1.5	36%	78%	2.7	82%
5	Springfield	57	1.4	56%	52%	2.6	81%
6	Brockton	47	1.9	44%	46%	2.5	91%
7	Lawrence	23	1	59%	61%	2.3	80%
8	Boston	113	1	45%	67%	2	88%
9	Lowell	29	1.1	45%	54%	1.7	81%
10	Worcester	34	0.9	49%	57%	1.6	80%
MA High Risk		433	1.3	48%	62%	2.5	86%
<i>Massachusetts</i>		<i>836</i>	<i>0.7</i>	<i>35%</i>	<i>44%</i>	<i>0.7</i>	<i>73%</i>

Source: MA Dept of Public Health, Childhood Lead Poisoning Prevention Program

The Massachusetts Lead Law requires the removal or covering of known lead paint hazards in homes built before 1978 where any children under six live. Lead paint hazards include loose lead paint and lead paint on windows and other surfaces accessible to children. Owners are responsible for complying with the law. This includes owners of rental property as well as owners living in their own single family home. If a child is lead poisoned by lead hazards where the child lives, the owner is legally responsible. An owner cannot avoid liability by asking tenants to sign an agreement that they accept the presence of lead paint.

Lowell has been very successful in combating the incidence of childhood lead paint poisoning with a targeted approach of its Lead Abatement Program. Over 108 properties, representing 272 units, have been deleaded in the Greater Lowell target area through the City's Lead Abatement Program since 2005. Map 2-12 illustrates the locations of all properties in Lowell that have been deleaded by the City's Lead Abatement Program. The Massachusetts Department of Public Health encourages cities and towns to expand enforcement of the Lead

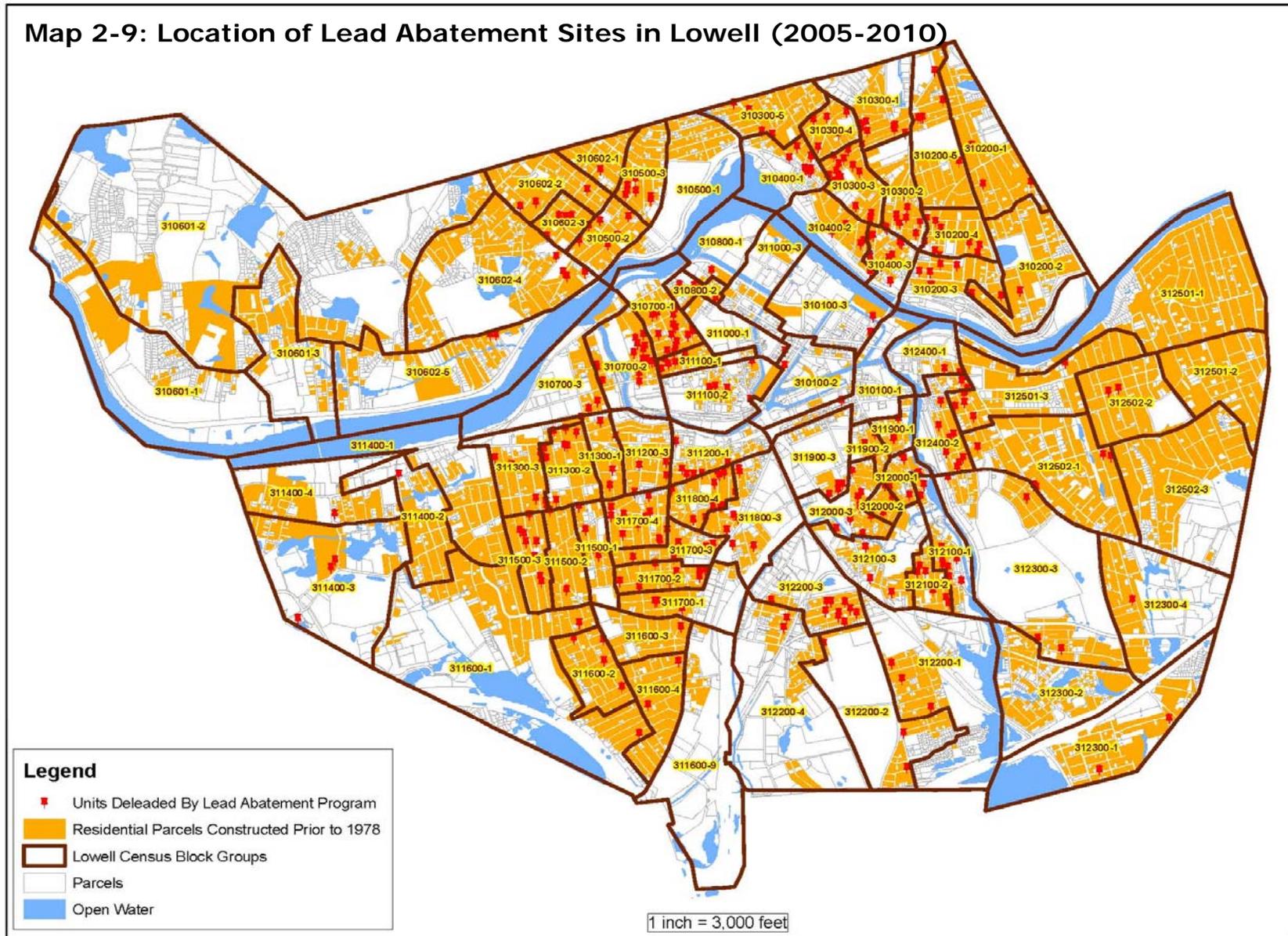
Law by having a trained and qualified individual to perform a lead determination whenever performing a State Sanitary Code inspection. The City of Lowell Inspectional Service Department has initiated training and hopes to expand lead specific enforcement in the future. For over 10 years, The Department of Planning and Development has been a recipient of grant funds from HUD's Office of Healthy Homes and Lead Hazard Control, making funds available to assist property owners to obtain compliance with the Massachusetts Lead Law. The Department of Planning and Development intends to make application for HUD funds as they become available.

The high cost of deleading units in Lowell has the effect of limiting the number of apartments that are safe to rent to families with young children because many landlords are unwilling or not financially able to undertake deleading of their apartments. In addition, landlords incur liability associated with a child who may become lead poisoned while living in his/her apartment.

Recently, with the assistance of a new staff person, the City of Lowell's Lead Abatement program has improved its outreach and education to the community. Because of these efforts, landlords in Lowell have become more aware and compliant with fair housing laws and renting to families with children and residents are more aware of their rights as tenants and homeowners. Because of this, discrimination against families with children does not seem to be as much of a problem as it was five years ago. However, local housing advocates report that housing discrimination has shifted from the overt to the subtle, meaning that this type of fair housing violation may still be occurring under the radar of the law.

The City's abundance of older housing stock with lead paint, in conjunction with Massachusetts Lead Paint Law was identified in the 2006 AI as having the effect of impeding the housing options of families with young children. The progress made on this impediment will be further discussed in Chapter 6 of this report.

Map 2-9: Location of Lead Abatement Sites in Lowell (2005-2010)



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3.0 EVALUATION OF THE JURISDICTION'S CURRENT FAIR HOUSING STATUS

3.1 FAIR HOUSING COMPLAINTS OR COMPLIANCE REVIEWS WHERE THE SECRETARY HAS ISSUED A CHARGE OF OR HAS MADE A FINDING OF DISCRIMINATION

The Massachusetts Commission Against Discrimination (MCAD) ensures equality of opportunity by enforcing the Commonwealth's Anti-discrimination laws, chapters 151B & 272, through the resolution of complaints of discrimination in the areas of employment, housing, public accommodations, services, credit and education. The MCAD reports all fair-housing-related complaints to the Department of Housing and Urban Development Fair Housing and Equal Opportunity office as required under law.

The following Table lists the housing discrimination cases regarding property in Lowell that have been reported to the Massachusetts Commission Against Discrimination (MCAD) since 2006. According to the data provided, most of the cases filed at MCAD during this time frame were on the basis of race or disability, and most were in private housing.

The MCAD complaint history since 2006 represents a very small snapshot of housing discrimination in Lowell. Fair housing discrimination in both the public and private sector is very difficult to measure due to the fact that only a small percentage of cases are reported. This lack of reporting is a significant issue in fair housing and occurs for a number of reasons. In many cases, protected classes do not know that they have been discriminated against or do not know what constitutes discrimination. Fair Housing discrimination can be very subtle. Furthermore, complaints brought to MCAD must be filed in person at the office in Boston, which is impractical for many and a near impossibility for some—especially recent immigrant populations. Other factors such as intimidation or an unwillingness to deal with the hassle and time commitment of a discrimination lawsuit deter many from filing a formal complaint with MCAD.

Table 3-1: Housing Complaint History for Lowell (2007-2010)					
Complaint ID	Respondent	Date Filed	Housing Type	Basis of Alleged Discrimination	Status
71602107	Lowell Planning Development	8/17/2007	Private Housing	Race	Closed - Lack of Probable Cause
71602638	Wingate Management	10/12/2007	Private Housing	Disability	Closed - Withdrawn With Settlement
71602809	B.P. B. Realty	10/25/2007	Private Housing	Disability, Race	Closed - Withdrawn With Settlement
71603023	Westminster Village	11/14/2007	Private Housing	Disability, Race	Closed - Lack of Probable Cause
81501519	Lowell Housing Authority	5/28/2008	Public Housing	Race	Closed - Lack of Probable Cause
81600605	Smith	3/10/2008	Private Housing	Marital Status	Closed - Failure to Cooperate
81602821	Panas	9/30/2008	Private Housing	Race	Closed - Lack of Probable Cause
81603010	Nguyen	10/17/2008	Private Housing	Race	Closed - Lack of Probable Cause
81603154	Allied Management/ Dover Condo Association	9/30/2008	Private Housing	Race	Closed - Lack of Probable Cause
81603384	Perkins	11/25/2008	Private Housing	Disability	Closed - Lack of Probable Cause
91503291	Lowell Housing Authority	12/23/2009	Public Housing	Disability	Closed - Lack of Probable Cause
91602006	Swede Village Condominiums, Silva Associates	8/5/2009	Private Housing	Disability	Closed - Lack of Probable Cause
91602712	Westminster Village Arms Apartments	10/20/2009	Private Housing	Disability	Closed - Lack of Probable Cause
101600039	Lowell Belvidere Housing	1/7/2010	Private Housing	Disability	Closed - Conciliated
101602290	Victor - Owner	9/3/2010	Private Housing	Public Assistance	Active
101602636	Westminster Village Arms	10/12/2010	Private Housing	Disability	Closed - Lack of Probable Cause
101603183	North Canal Apartments	12/9/2010	Private Housing	Race	Active

Source: Massachusetts Commission Against Discrimination

3.2 FAIR HOUSING DISCRIMINATION SUIT(S) FILED BY THE DEPARTMENT OF JUSTICE

In 2008, the Cambodian Mutual Assistance Association, a local non-profit providing services to recent immigrant populations in Lowell, worked in collaboration with the Department of Justice to address fair housing concerns at a local apartment complex called Pine Properties. Clients alleged that they had been discriminated against in their right to fair housing based on their national origin. The alleged acts of discrimination included unfair and biased credit and background checks on Cambodian applicants seeking housing in these properties. According to the alleged victims of this discrimination, white counterparts were not subjected to the same scrutiny in background checks when applying for the same apartments.

As the first case of the Department of Justice’s “Operation Home Sweet Home,” fair housing “testing” was conducted to determine that discrimination was in fact taking place. A lawsuit was filed against the managers of the Pine Properties. The final ruling of the case found the managers of this property guilty and ordered them to pay \$158,000.00 to resolve allegations. Since then, the Department of Justice has filed 237 similar cases nationally. In response to this case’s findings, the CMAA applied to HUD for a grant to fund further fair housing outreach and testing here in the community. Ultimately the program was not selected for funding. In the meantime the CMAA is working to strengthen its relationship with the Fair Housing Center of Greater Boston in an effort to better inform its clients of their rights under fair housing law.

3.3 FAIR HOUSING DISCRIMINATION SUIT(S) FILED BY PRIVATE PLAINTIFFS

In 2001, the Massachusetts Law Reform Institute, on behalf of the Massachusetts Union of Public Housing Tenants and a group of residents, filed suit in Middlesex Superior Court to prevent demolition of the Julian D. Steele public housing complex on Gorham Street. The defendants named are the Lowell Housing Authority, the City of Lowell, and Jane Wallis Gumble, Director of the Massachusetts Department of Housing and Community Development.

The original lawsuit, along with amendments, was settled in 2008 and an amended Replication Plan for affordable housing units was put into action. A Mobility Counselor was also assigned to provide outreach, counseling and relocation services to former JDS residents. Please refer to chapter IV of this document for further details on the settlement.

The Department of Planning and Development was unable to identify any other Housing Discrimination suits filed by private plaintiffs. The Fair Housing Center of Greater Boston was consulted on this matter and was also unable to provide a resource listing these cases filed by residents from the City of Lowell.

3.4 REASONS FOR ANY TRENDS OR PATTERNS TO WHICH NEW OR REVISED FAIR HOUSING ACTIONS MAY BE NEEDED BECAUSE OF THESE TRENDS

There are no new trends to be addressed in this section.

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4.0 IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

4.1 PUBLIC SECTOR

4.1.1 ZONING AND SITE SELECTION

The City of Lowell continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. Foremost among these are zoning and land-use regulations. In December of 2004, the Lowell City Council adopted a comprehensive reform of the City's zoning regulations, consistent with the 2003 Master Plan. An update to this Master Plan is currently in progress and is scheduled to be released in late 2011.

Under the new zoning, more than 38% of the City's land area is zoned to allow multi-family development in residential or mixed-use zoning districts. The City allows significant density in these zones as described in Table 4-1. Even the most restrictive single-family zone allows more than four units per acre. In addition, the City's Zoning Ordinance allows accessory dwelling units in single-family zoned areas and encourages the conversion of existing buildings including schools, churches, and obsolete industrial buildings, into multi-family residential uses, even when those buildings are located in single-family zoning districts. In certain urban mixed-use zoning districts parking restrictions are limited to one space per unit, and a by-right waiver for all required parking is provided if spaces are leased in a public parking structure within 1,500 feet of the project site.

Zoning District(s)	Proportion of Land Area	Units per Acre
Suburban Multifamily (SMF) & Suburban Mixed Use (SMU)	0.06	14.5
Traditional Two Family (TTF) & Traditional Multifamily (TMF)	0.16	10.9
Traditional Mixed Use (TMU), & Neighborhood Business (NB)	0.03	17.4
Urban Multifamily (UMF) & Urban Mixed Use (UMU)	0.03	43.5
Downtown Mixed Use (DMU), High Rise Commercial (HRC), & Institutional (INST)	0.08	60-120*

Source: City of Lowell Zoning Code; *Limited only by floor area ratios

Lowell's permit fees and development review process are also some of the least burdensome in the region. The City does not charge development impact fees or technical review fees that are permitted under Massachusetts General Law and places no special permitting reviews on affordable housing projects that would not be required of all developments.

Housing affordability in Lowell is largely an economic issue, not a regulatory one, and the City's public policies relative to housing are not restrictive or discriminatory. The City's tax policies generally affecting land and other property, land use controls, zoning ordinances, building codes, code enforcement, fees and charges, growth limits and

policies that affect the return on residential (including supportive housing) investment are not major impediments to the development of affordable housing opportunities in Lowell.

Group Homes: The City of Lowell's Zoning Ordinance does not restrict the location of group homes in any manner that conflicts with the Joint Statement of the Department of Justice and The Department of Housing and Urban Development for Group homes. Definitions of family and classifications of use are applied equitably to all projects. No specific restrictions are placed on group homes serving any type of population.

Most group homes in the City of Lowell are affiliated with a State Agency and are therefore exempt from local zoning regulation except for the reasonable regulation of building size, bulk, lot size, and other dimensional requirements to insure the health, safety, and welfare of citizens and occupants.

Family Status: The City of Lowell Zoning Ordinance Article II defines a family as "An individual, or two (2) or more individuals related by blood, marriage, or adoption living together, or not more than three (3) individuals not related by blood, marriage, or adoption living together." This definition is enforced without prejudice and, although fairly lenient, any restrictions on unrelated co-habitation are intended to prevent overcrowding of off-campus student residences near the UMass Lowell campus. The only standards that restrict the number of occupants in a home are based on state sanitary code requirements for issuing habitation certificates and are related to a minimum number of square feet required for each occupant of rental housing.

Public Housing: Public Housing developments in Lowell are subject to the same procedures and requirements as other private developments of four or more units. For any proposed project that includes four or more units a public hearing is required as part of the Planning Board's site plan approval process. The public hearing includes notification to abutters of the basic nature of the project and the name of the proponent. A similar public hearing and notification requirement exist for residential subdivisions under the State subdivision control law and are enforced fairly and equally for all applicants. Lowell's process for reviewing public housing developments complies with fair housing requirements.

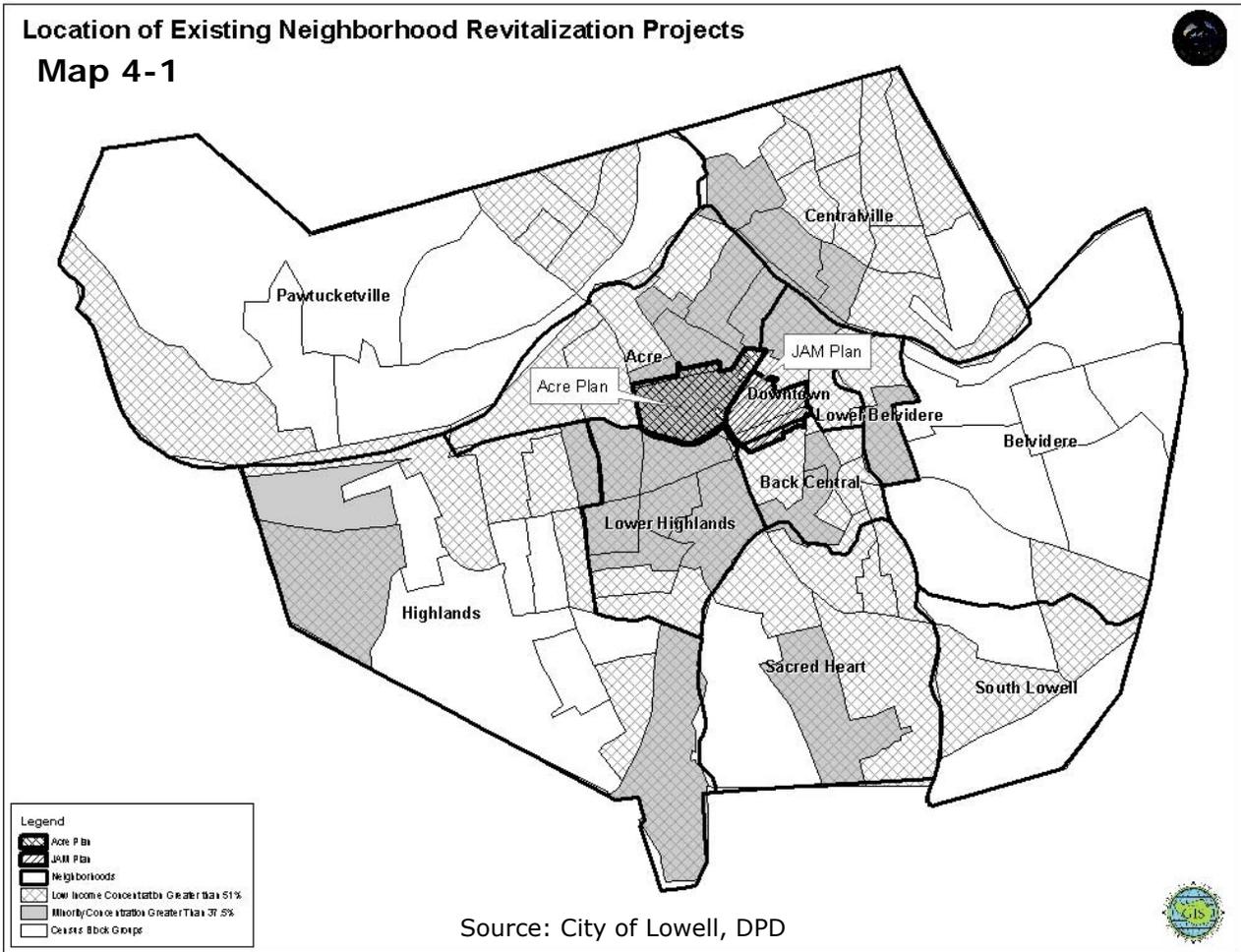
Homeless Persons: The City of Lowell does not have an ordinance criminalizing homelessness directly or addressing vagrancy. Section 17-6(a) of the City's Code of Ordinances addresses loitering as follows: "No person shall stand or loiter in or on any street, sidewalk or public place in such a manner as to obstruct the free passage or travelers thereon nor shall any person on such a street, sidewalk, or public place, after being directed by a police officer to move on and disperse, on a same or subsequent day, reassemble or loiter or remain so as to obstruct the free passage of travelers or motor vehicles; provided that nothing contained in this section shall be construed to deny the right of peaceful picketing." This law has generally only been used as a tool to reduce gang intimidation and violence in parks and on downtown streets.

4.1.2 NEIGHBORHOOD REVITALIZATION, MUNICIPAL AND OTHER SERVICES, EMPLOYMENT- HOUSING TRANSPORTATION LINKAGE

Neighborhood Revitalization Projects

The City has three major neighborhood revitalization projects that it plans to continue to implement over the next 5 to 10 years. These projects, as Map 4-1 illustrates, are

located in block groups with high concentrations of both low-income and minority populations. Each accompanying revitalization strategy has housing goals and/or economic development/urban revitalization goals and is discussed in more detail below. These projects have multiple financial partners that include non-profit and for-profit developers, neighborhood residents, private lending institutions, and federal, state, and local resources. CDBG and HOME Program funds will continue to be expended for initial planning expenses, predevelopment, and capital expenses for all of three programs. Anti-displacement and Relocation Plans for all three of the Neighborhood Revitalization Projects have been reviewed.



Acre Urban Revitalization and Development Project: The City is investing a significant amount of its HOME and CDBG funds in the Acre Urban Revitalization and Development Plan. This is a \$55 million dollar, 20-year plan to revitalize a 0.17 square mile area within one of the most depressed neighborhoods in the City known as the Acre Neighborhood. Since its adoption as an urban renewal district by the City in 1999, the neighborhood has witnessed the construction of a new Lowell Senior Center, a new 650-student middle school, over 280 new units of housing (80 of which are affordable), over 20,000 square feet of commercial space, and the completion of many public infrastructure improvements. The next 10 years of the Acre Plan will consist of the further acquisition, demolition, and/or rehabilitation of additional housing units and commercial space. To jump start this next phase in the Plan, the City has acquired three commercial properties, two of which using HOME funds, which over the next year demolished and prepared for the construction of several new affordable housing units. In the last five years alone, the Acre Plan has also generated over \$40 million in private investment and has led to the creation of over 175 permanent jobs.

Jackson Appleton Middlesex Urban Revitalization (JAM) Plan: The JAM Plan was developed with the vision of creating a vibrant and thriving urban district to link Downtown Lowell with the Gallagher Transportation Terminal, forming a mixed-use, multi-modal gateway to the City. To jump start this vision, the City constructed a new \$25 million, 900-space parking garage with over 17,000 square feet of active ground floor retail space, which opened in February 2008. This project has and will continue to serve as a catalyst for future residential and commercial development within the JAM area by providing much needed parking and active retail space to the district.

The highlight of the JAM Plan is the 15-acre redevelopment site known as the Hamilton Canal District. The City assembled the site through a series of acquisitions, and in August 2007 named Trinity Financial as Master Developer for the vacant and underutilized land in the heart of the City. The project will create a vibrant, mixed-use neighborhood spanning the Merrimack, Pawtucket and Hamilton Canals that will transform the gateway of Downtown Lowell by connecting the transportation hub at the Gallagher Terminal and the Lowell Connector with the core downtown, the Arts District and the major event venues.

The Master Planning process for the Hamilton Canal District lasted from December 2007 to December 2008, consisting of five comprehensive design/planning charrettes and dozens of other community meetings and focus groups. Through this process, the City and Trinity created the Hamilton Canal District Master Plan and Form Based Code, which will dictate the future development of the area. The entire build out of the Hamilton Canal District will include approximately 11 new construction and 4 historic rehabilitation buildings, comprising over 725 units of housing including market rate and affordable housing, up to 450,000 square feet of commercial/office/research & development space, 55,000 square feet of retail, the potential for a 450-seat professional theatre, and the creation of between 400 and 1,800 permanent full time jobs. Additionally, the Massachusetts Department of Capital Asset Management will be constructing the new 250,000 square feet, \$175 million Lowell Trial Court on a portion of the site. The complete build out of the development is expected to take 10 years to complete, generating over \$4 million in

new tax revenue for the City, representing between \$700 and \$800 million of investment.

Phase I of the HCD began during the 09-10 program with the redevelopment of the Appleton Mills complex which will result in 135 units of rental artist workforce housing including 11 HOME assisted units. This development is expected to be completed in 2011.

Low-Income Neighborhood Impact Initiative: During the 2009-2010 Program Year, Lowell launched a Neighborhood Impact Initiative to target resources in block groups where more than 51% of residents are low- or moderate-income and where significant deterioration has led to limited private investment and declining property values. The aim of this comprehensive program is to help stabilize and revitalize neighborhoods through the concentrated investment of staff and financial resources from all City departments. Activities include improvements to neighborhood facilities, parks, and infrastructure through divisions of the Department of Public Works, enhanced inspections by officials from the Health and Building Departments, coordinated actions by public safety departments, and significant capital investment to enhance the appearance of the targeted area.

The City plans to direct resources to a different neighborhood each year, with a goal of addressing all of Lowell's low- and moderate-income neighborhoods over a 5-6 year period. By concentrating resources in a target area, the City hopes to maximize the value and impact of its actions and expenditures. Consistent with the recommendations of the Comprehensive Master Plan, particular focus will be paid to the commercial centers and public squares within Community Development Block Grant -eligible neighborhoods, where impacts will be felt by the broadest possible cross-section of neighborhood residents.

The program was seeded with \$425,000 in FY 09-10 Community Development Block Grant funds for the Centralville neighborhood, along with portions of other funding including Chapter 90 funds for streets and sidewalk improvements, housing rehabilitation and lead paint abatement funding, economic development incentives, and grant-funded policing initiatives. For the project's second year (FY10-11) the City has selected the Lower Highlands neighborhood of Lowell for the Neighborhood Impact Initiative. Community Development Block Grant funding will once again be provided to make improvements in this area.

Municipal and Other Services:

Municipal services such as code enforcement, community policing, street and sidewalk improvements, and neighborhood services are funded with a combination of local tax revenues, state aid, and CDBG funds. CDBG funds are used to supplement these services in neighborhoods that are located within census tracts or block groups where at least 51% of the population is low- to moderate-income. An analysis of these services does not indicate any discriminatory practices. The services are undertaken to insure that all neighborhoods benefit equally.

Employment-Housing-Transportation Linkage:

Lowell is well connected to major employers in the area via public transportation provided by the Massachusetts Bay Transportation Authority (MBTA) and the Lowell Regional Transit Authority (LRTA). The MBTA provides commuter rail service from

the Gallagher Terminal in Downtown Lowell to North Station in Boston. Inter-city bus lines also serve points in Massachusetts, New Hampshire, Vermont and beyond from the Gallagher Terminal.

The LRTA operates bus routes throughout Lowell and the surrounding suburbs. In the last five years the LRTA completed an extensive revision to their service plan by moving its bus hub to the Gallagher Terminal, simplifying transfers between public transit modes. (Refer to Map 4-2 for the LRTA bus route map) Of the 17 routes currently available through the LRTA, 9 serve Lowell neighborhoods and a Downtown Circulator runs between the Gallagher Terminal and downtown Lowell every 15 minutes. Service level has also increased with the addition of runs during the morning and evening peak hours as well as Saturday services to suburban communities. Service has also been added on 11 holidays where service was previously unavailable.

Bus routes follow Lowell's major thoroughfares as well as smaller arteries as needed. Routes target the City's major housing complexes as well as hospitals and major commercial centers and employers. The LRTA adjusts its routes to accommodate riders' needs whether by adding additional stops with the development of a new retail center or extending hours during citywide special events.

The LRTA recently launched a new fare collection system using a smart card. This new system is compatible with those used by the Merrimack Valley Regional Transit System (serving Haverhill and Lawrence) and the Massachusetts Bay Transportation Authority (serving Greater Boston) simplifying transfers to other regional transit services.

Finally in the past five years the LRTA has made significant upgrades to its fleet of buses not only improving the energy efficiency of buses (through use of natural gas or hybrid electricity) but also improving their accessibility especially for riders with physical disabilities or traveling with small children.

Despite these improvements the LRTA recognizes the need to offer more service during non-peak hours. Currently bus service is available Monday through Saturday from 6am through 7 pm. Service is not available on Sundays or during evening hours forcing residents who work second or third shifts or trying to access health care or retail services to seek other (often more costly) transportation options. According to the LRTA extending its service at this time is not financially feasible.

The City of Lowell's 2003 Comprehensive Master Plan details a strategy to expand public transportation services in Lowell for residents, employees and visitors. Based on research conducted for the Existing Conditions Report's Transportation component, which included traffic volume and pattern studies, the City of Lowell's Department of Planning and Development recommends the following in the Master Plan:

Recommendation: Provide multi-modal transportation connections within and between Lowell and a variety of regional destinations.

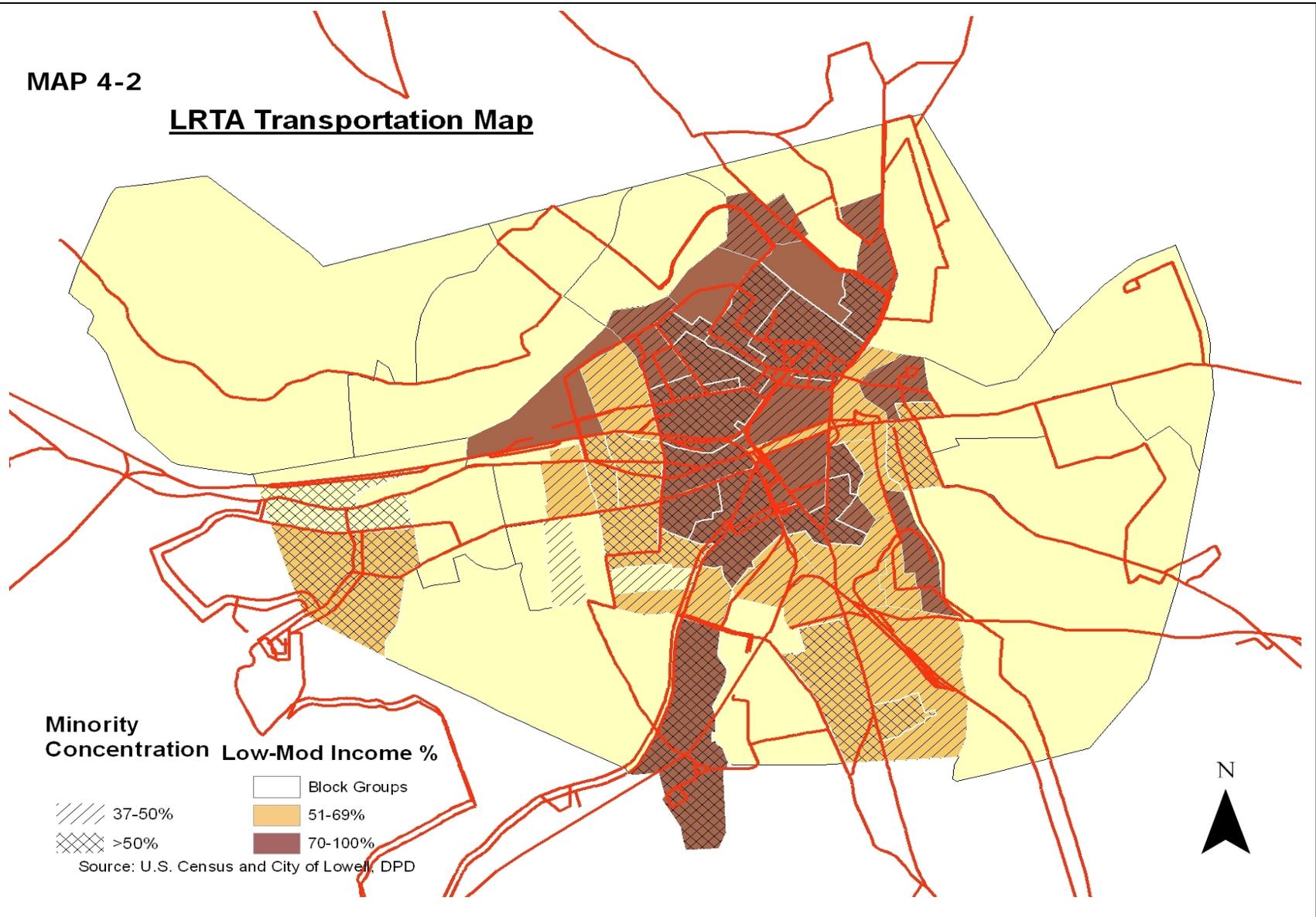
Action Step: Expand the hours of nightly LRTA operation in conjunction with MBTA community rail arrivals/departures, special events and other locations of evening activities.

The City is currently conducting an extensive planning process to update its Master Plan. Transportation will be a key component of this update and may result in additional recommendations and action steps.

It is also worth noting here that there are local efforts to extend the City's trolley line, currently used primarily as a tourist attraction through the National Parks, into a more functional and viable transportation option. Proposed routes will serve areas of high concentrations of minority and low- and moderate-income residents, connecting them not just to existing regional transportation network, but also to education and employment opportunities, supermarkets and other retail centers, as well as social and cultural venues.

MAP 4-2

LRTA Transportation Map



4.1.3 PUBLIC HOUSING AUTHORITY AND OTHER ASSISTED/INSURED HOUSING PROVIDER TENANT SELECTION PROCEDURES; HOUSING CHOICES FOR CERTIFICATE AND VOUCHER HOLDERS

The Lowell Housing Authority administers 1,641 public housing units and 1,246 housing vouchers. The majority are federally subsidized. Community Teamwork Inc, a regional community services agency based in Lowell, administers about 2,509 vouchers of which 787 or 31% are currently used for units in Lowell.

The rates of minority populations for each development range from 10.5% to 26%. There is no overly concentrated percentage of minorities in any of the developments.

Tables 4-2 and 4-3 present information from the LHA’s Annual Plan for FY 2009. According to the Annual Plan, there are 3,583 families on the waiting list for federal public housing. Approximately 66% of these families are minorities. Federal Public Housing waiting lists are open for all types of units. The waiting period for 1-bedroom units is 12-18 months and the wait for 2-5 bedroom units is 3– 5+ years. State Public Housing applications are accepted for emergencies only. Of the 3,721 families on the Section 8 waiting list, 62% are minorities. The Section 8 waiting list has been closed for four and a half years. According to the LHA, 90% of the families on the waiting lists have an income of less than or equal to 30% of the area’s median income; and the majority of households have children.

	2004		2009	
	Total	Minority %	Total	Minority %
Federal Public Housing	5,059	62%	3,583	66%
Section 8	332	58%	3,721	62%

Source: Lowell Housing Authority

As table 4-2 demonstrates, there has been a decrease in the number of individuals waiting for Public Housing (-29%) and a drastic increase (+91%) in the number of individuals on the Section 8 Waiting List since 2004. These changes can be attributed to a recent update to the waitlists conducted by the LHA. Because of this update, many cases on the waitlist were closed due to non-response.

Type and Size	Waiting Period	Status
1 Bedroom Public Housing	12-18 months	Open
2 Bedroom Public Housing	3-5 years	Open
3 Bedroom Public Housing	3-5 years	Open
4 Bedroom Public Housing	4+ years	Open
5 Bedroom Public Housing	4+ years	Open
Section 8 Vouchers	3-5 years	Closed
State Public Housing	3-5 years	Open

Source: Lowell Housing Authority

The LHA's preference system has been amended since the release of the 2006 AI, omitting language regarding number of hours worked per week. In October 2000 the LHA Board of Commissioners approved their current tenant selection criteria, which include preferences for veterans and working families. While this trend occurred nationwide, LHA was one of the last Public Housing Authorities to implement these changes due to concerns over how disabled and non-working households would be affected. Because disabled households receive income through public assistance and may not work, and because social security income is considered equal to income earned through work for purposes of this comparison, consequences of these new preferences could adversely affect disabled and/or non-working households' abilities to locate suitable affordable housing.

The LHA preferences for tenant selection are as follows:

- A person/household involuntarily displaced from a dwelling in Lowell by natural disaster, fire, unwarranted landlord or government action, including capital programs of the LHA.
- A working head of household or spouse or a person 62 years or older, or a person unable to work because of the extent of his/her disability.
- A legal resident of Lowell, or person working in Lowell, or a person with a job offer to work in Lowell.
- A victim of domestic violence who has been relocated as verified by the police.
- A veteran as verified by the Department of Veterans Affairs.

The most recent Low Rent Public Housing (LRPH) Administrative Plan is consistent with revised HUD regulations and requirements as set forth in 24CFR Part 5, Federal Register Notices and other binding directives from HUD. The LRPH Administrative Plan has omitted all discretionary matters that were inconsistent with current HUD Regulations and Guidelines. It incorporated all current non-discretionary requirements and automatically incorporates into its Administrative Plan future non-discretionary requirements concurrent with the effective date of the Federal Register Rule or other binding program directives.

The LHA understands the need to broaden housing choices for both minority and non-minority low-income individuals and families. Unfortunately, due to the lack of affordable units in Lowell, and to an even greater extent in the surrounding suburbs, housing choices are extremely limited. The rate of openings for public housing units is approximately .03% per year, and approximately .02% for Section 8 vouchers.

Section 504 Assessment:

The Lowell Housing Authority completed its Section 504 assessment in June 2010 to determine how the LHA can best comply with HUD's accessibility requirements. The assessment was based on a variety of factors including LHA's waiting list for all accessible units. The report concluded that there was a need for 5% of all Federal units to be accessible. In order to reach this 5% threshold, the LHA has agreed to add an additional 25 accessible housing units to its housing stock before January 1, 2015.

4.1.4 SALE OF SUBSIDIZED HOUSING AND POSSIBLE DISPLACEMENT

Julian D. Steele Redevelopment:

The Julian D. Steele development was a 284-unit state funded public housing development for low-income families with children. In August 2000, the Massachusetts State Legislature passed legislation which allowed the Lowell Housing Authority to demolish the development. The LHA relocated residents of JDS from 2000 to 2002, after which the property was demolished.

In December of 2002 the Massachusetts State Legislature approved a plan (Chapter 97 of the Acts of 2002) that allowed the Lowell Housing Authority to rebuild a new neighborhood consisting of 180 mixed income units on the former state-funded JDS public housing project site. The 180 new units were to be constructed in single and two-family owner-occupied homes.

The public- private partnership, formed to build this neighborhood, includes a consortium of local banks contributing \$24 million dollars in financing to the project developers. As a partner in this effort, the City of Lowell is utilizing a combination of Consolidated Plan funds, Low Income Housing Tax Credits (LIHTC), project-based subsidies, and private funding to support the development of 220 additional units of affordable housing scattered throughout the City, referred to as "Replication Units." The planned Replication Units carry the following affordability restrictions:

PROPOSED UNITS	
Affordable to households at or below 50% AMI for 30 years	79 Units
Affordable to households at or below 50% AMI for 15 years	78 Units
Affordable to households at or below 80% AMI for 30 years	32 Units
Affordable to households at or below 80% AMI for 15 years	31 Units
TOTAL Replication Units	220 Units

The implementation of the Replication Plan was interrupted by proceedings from a lawsuit filed in 2001 by former JDS residents against the LHA and the City of Lowell. The original lawsuit, along with amendments, was settled in 2008 and an amended Replication Plan was allowed to proceed. The settlement included a provision requiring the City to identify, site and develop a final 35 Replication Rental Housing units that shall remain at or below 50% of the Lowell area median for at least fifteen years. These units are to be located in designated "Opportunity Areas" as outlined in the settlement. A Mobility Counselor was also assigned to provide outreach, counseling and relocation services to former JDS residents.

At present, 10 of the settlement's 35 Replication Units have been completed. The LHA is planning to release a Request for Proposals for a portion of the remaining 25 Replication units in the spring of 2011. The number of units completed each fiscal year is contingent on the availability of Section 8 vouchers.

JDS Mobility Counselor

An additional outcome of the JDS lawsuit was the appointment of a Mobility Counselor to provide relocation counseling and services to former JDS residents. The counselor was initially funded in part with Community Development Block Grant funds in the 2008-2009 fiscal year and continues to provide outreach, housing search and follow-up counseling services to these former JDS residents at present. This program is voluntary and offers relocation to areas of opportunity where better educational programs and employment opportunities may be realized.

The Mobility Counseling Program has made great progress over the last year. In February 2010, the Authority opened the Section 8, Section 8 Project Based Program and Lowell Rental Assistance Fund Program Waiting Lists for all Tenant Class Plaintiffs. A total of 62 applications were received for the Section 8 Program, 19 applications were received for the Section 8 Project Based Program and 10 were received for the Lowell Rental Assistance Fund Program.

With the assistance of Judith Liben of Massachusetts Law Reform, a grant in the amount of \$5,000 was received from the Parker Foundation to pay security deposits for families being relocated. The City of Lowell provided \$5,000 of CDBG funding for three consecutive years for this same purpose. Families were able to obtain up to \$800.00 for security deposits from these funding sources. The Department of Housing and Community Development has provided the funding for moving costs that range from \$800 to \$1,200 per family, depending on family size.

Mobility Counselor Judy Cohn and her staff have been very effective in identifying units for clients, negotiating rents with landlords and requesting lower security deposit payments to enable families to acquire more suitable housing. Judy has interviewed each family, assessed their needs, made recommendations and worked with families to ensure that relocations successfully meet their housing goals. LHA residents have expressed appreciation for these services.

As of March 15, 2011, applications received for all programs have been or are in the process of being screened for eligibility. There are 17 families who have relocated using a Section 8 Voucher. A total of 4 families have been placed in Section 8 Project Based units. There are currently 11 families in housing search with 5 families approved and ready to receive Section 8 Vouchers.

One of the obstacles at this time is there are no funds available to pay security deposits for families ready to lease units. Assistance from The Department of Housing and Community Development has been requested to allocate funds for this purpose. DCHD is considering this request in order to keep the program moving forward.

The Lowell Housing Authority is working with the City of Lowell to identify apartments in areas of opportunity for project based rental assistance. To date, 10 units have been placed under contract and the Authority will issue an RFP in late spring to contract additional units.

Designation of The Lowell Housing Authority's Federal/ Disabled Housing Portfolio:

Lowell Housing Authority's Designated Housing Plan Allocation Plan for Senior Designated Housing was updated in 2010. HUD granted approval of this update in December 2010, which designates 310 units for Elderly and the Disabled at the following four properties: Faulkner Street, Father Norton Manor, Dewey Archambault Tower and Francis Gatehouse Mill.

Table 4-5 below summarizes the Plan as HUD approved it in December 2001. Table 4-6 provides more detail about those housing developments included in the back in 2001.

Table 4-5: Summary of LHA Senior Designation Plan, 2001		
Current Use (Before the Designation Plan)		
	Number of Units	Preference
	418	Elderly (>62) Disabled (<62)
Designation Plan		
Elderly Set Aside Units	Number of Units	Preference
75%	310	Elderly (>62) Near Elderly (>50)
Mixed Units	Number of Units	Preference
25%	106	Elderly (>62) Disabled (<62) Young Disabled (<50)
Wheelchair Units	Number of Units	Preference
	31	Disabled (Any Age)

Source: LHA Senior Designation Plan (2001)

Table 4-6: Designated Units, 2001			
Development Name:	Total Units	# Designated Units (75%)	# Disabled Units (25%)
Faulkner Street	27	20	7
Father Norton Manor	112	84	28
Archambault Towers	189	141	48
Francis Gatehouse Mill	90	66	24
Total	418	311	107

Source: LHA (2001)

In 2010 HUD approved an update to the 2001 LHA Designation Plan. Tables 4-7 and 4-8 outline the Update to the Designation Plan. The total number of units in these properties has decreased by 4 to 414 and the total number of designated units has decreased from 311 to 310. While individually, some developments have not

reached the 25%-75% distribution of units, overall, LHA has achieved the target 25% set out in the original Plan. The Lowell Housing Authority has successfully implemented the Designation Plan.

Location	Total Units	Total Designated Units	Percent Designated
Archebault Towers	188	141	75%
Father Norton	111	83	75%
Francis Gatehouse	88	66	75%
Lawrence/ Faulkner Street	27	20	74%
Total	414	310	75%

Source: Lowell Housing Authority

Location	Total Units	Elderly		Near Elderly		Young Disabled	
		Total Units	Percent	Total Units	Percent	Total Units	Percent
Archebault Towers	188	88	47%	75	40%	26	14%
Father Norton	111	83	75%	25	23%	3	3%
Francis Gatehouse	88	66	75%	16	18%	3	3%
Lawrence/ Faulkner Street	27	21	78%	5	19%	1	4%
Total	414	258	62%	121	29%	33	8%

Source: Lowell Housing Authority

Expiring Use Projects:

Among the subsidized housing units in Lowell, 1,391 are currently at risk of losing their affordability status before 2015. The loss of these affordability restrictions limits the number of affordable units available to low-income and moderate-income households. Unless the property owners renew their Section 8 contracts or consent to extending their affordability agreement, these units may be sold or rented at market rate. Given the vulnerability of the current housing market it's unlikely that these property owners will allow these restrictions to lapse. In the event that they do, the City's housing office is notified. These housing units are listed in Table 4-9.

Table 4-9: Expiring Use Inventory			
Property Name	Units at Risk on or Before 2015	Affordability Expires	Subsidizing Agency
Centennial Island Apartments	117	2014	Private
D'Youville Elderly	41	2014	HUD
D'Youville Senior Care Center, Inc.	22	2011	HUD
First Lowell Rehab	46	2012	HUD
Lowell Residence	6	2011	HUD
Lowell Sun	84	2012	HUD
Mazur Park Apartments	50	2011	HUD
River Place Towers	449		MHFA
Townhouse of Lowell	96	2015	HUD
The Wentworth	40	2015	HUD
Three Gems	8	2009	HUD
Westminster Village Arms	432	2012	MHFA
TOTAL UNITS	1391		

Source: Citizens' Housing and Planning Association (CHAPA), 2011

Map 4-3 illustrates the location of these developments in Lowell. These sites are located in block groups with high concentrations of low-income and minority households. If allowed to expire, the loss of these units may contribute to the deconcentration of affordable housing in these neighborhoods. While the loss of these units would be consistent with the proposed actions in Recommendation #2 of the 2006 AI, the shortage of affordable housing to the region, may be more detrimental than the benefits of deconcentrating poverty in these block groups.

Map 4-3: Location of Expiring Use Sites Relative to Areas of Minority Concentration



Source: Department of Housing and Community Development, 2011

Note: Some of the projects at risk of losing affordability status have multiple locations and are not depicted on the map.

4.1.5 PROPERTY TAX POLICIES

The City of Lowell has two tax rates, one for residential property (including residential income properties) and one for commercial, industrial and personal property (CIP). For FY2010 the residential rate is \$13.27 per thousand, the CIP rate is \$27.46 per thousand. The residential rate is applied to all residential properties citywide, regardless of location, value, number of units, owner-occupancy, etc.

Valuations are set separately for land and for the buildings/structures on the property then combined to set annual tax bills. Land values are set based on 34 distinct assessment areas of the city, which are defined by consistent lot sizes and market values of property.

Both the market approach and the income approach are used to determine value. The market approach is used more often for 1-3 residential unit parcels because more comparable sales are available for these types of properties, while the income approach is used more often for larger complexes because they are most often income-generators for the owners and have fewer reliable comparables. Both approaches are used in some cases to establish parity between the two methods and to ensure that all properties are being assessed equally and fairly.

The City of Lowell Assessor's Office also administers real estate tax exemption and abatement programs as allowed under Massachusetts law. Generally, real estate tax abatements are available through an appeal process to those who believe the properties are overvalued. Exemptions to real estate taxes are governed under strict Massachusetts' law, and are offered to persons fulfilling the requirements of any one, or more, of the following six (6) categories:

- Blind
- Veteran with a service connected disability
- Surviving Spouse
- Minor Child of Deceased Parent
- Senior Citizen, (70 years or older)
- Hardship³

4.1.6 PLANNING AND ZONING BOARDS

Planning Board, Conservation Commission, and Zoning Board of Appeals

The lack of diversity among members of the City's land use boards was identified as an impediment in the 2001 and 2006 AI.

³ "Hardship" is fairly rigidly defined by statute and interpretations offered by Massachusetts Department of Revenue. Current interpretations of the legal definition of "hardship" as a basis for tax exemption involve meeting 3 threshold criteria. "so aged (1), so informed (2), or so poverty stricken (3)...." Most current legal opinions, including those offered by Legal Department of City & Town Property Tax Bureau, suggest that persons under 60 years of age, no matter how infirm or poverty stricken, cannot meet the legal requirements for a hardship exemption.

The Planning Board is made up of five members who are appointed to five-year terms by the City Manager and confirmed by the City Council. The current Planning Board includes five men, all of European ancestry.

The Conservation Commission is made up of seven members who are appointed to three-year terms by the City Manager. Current membership includes three men and three women, all are Caucasian.

The Zoning Board of Appeals (ZBA) is made up of five members and two alternate members, who are appointed by the City Manager and confirmed by the City Council. Their terms of service are two or four years at the City Manager's discretion. The current ZBA includes five male members, and one male alternate. Five are Caucasian and one member is of Cambodian descent.

4.1.7 BUILDING CODES

The Lowell Inspectional Services Department has adopted the Architectural Accessibility Barrier Standard as required by the State of Massachusetts. These guidelines are stricter than those required by The Americans with Disabilities Act requirements. The regulations apply to new construction and any rehabilitation in excess of 30%, or \$100,000 of the assessed value of the property.

4.1.8 CONCENTRATION OF SUBSIDIZED HOUSING IN LOWELL

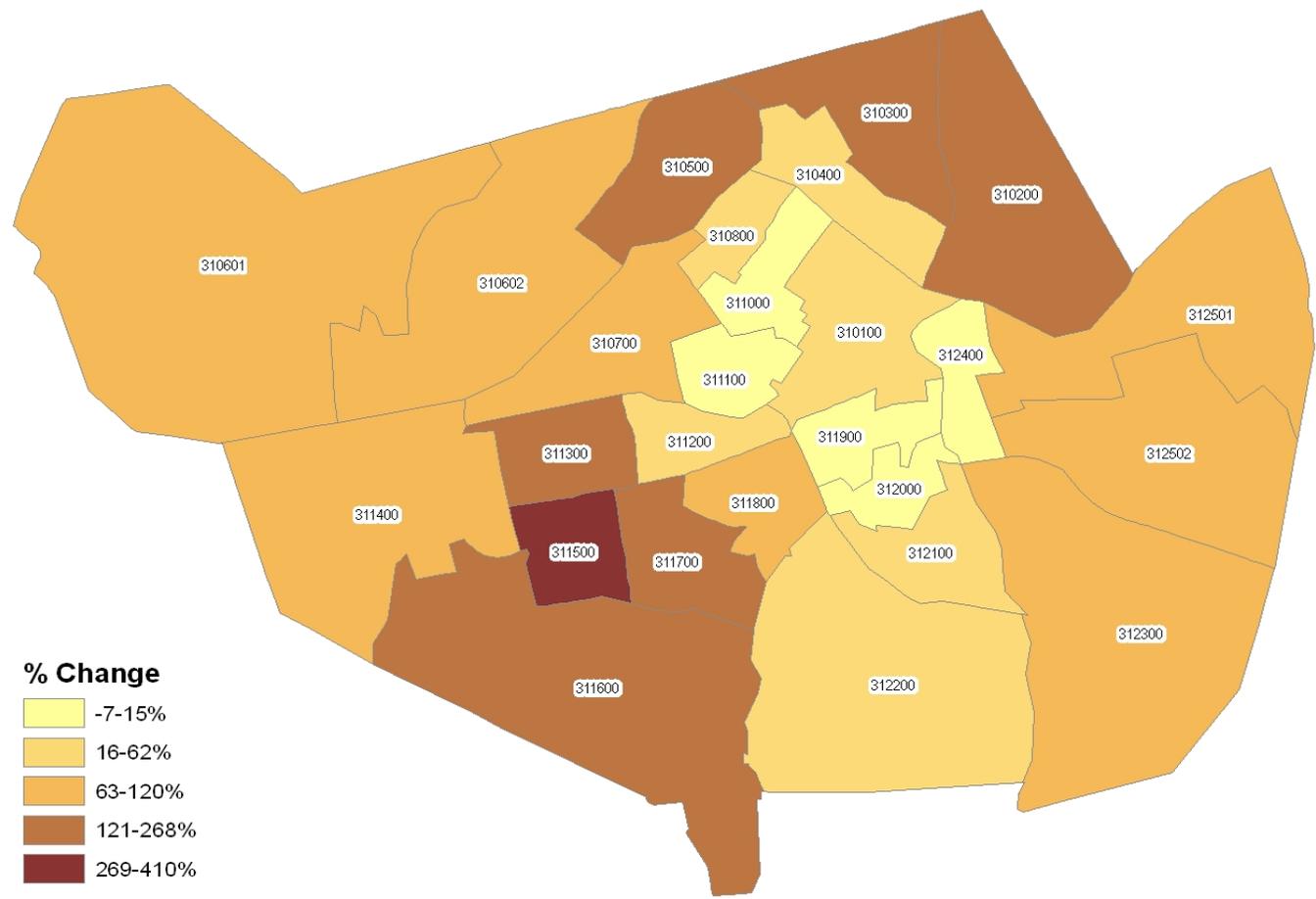
The 2001 AI identified the concentration of subsidized housing in the census tracts located in Central Lowell as an impediment that limits the housing options of low-income minorities to areas of high concentrations of low-income and minority populations.

Because of progress made between 2001 and 2006, the impediment was downgraded to a recommendation. Since 2006, further progress has been made to deconcentrate areas in Central Lowell that have traditionally been defined with high concentrations of low income and minority populations.

According to 2000 Census data, minorities live in all neighborhoods in the City but are primarily concentrated in the lower per capita income census tracts in Central Lowell and the Downtown. 60% of the total, or 1200, public housing units are located in these Census Tracts. The 2000 Census shows that minority concentrations in all areas of Lowell have increased from 1990 to 2000, with the largest growth in Block Groups located in the Centralville, Lower Highlands, and Highlands neighborhoods. Map 4-4 depicts where this growth occurred in Lowell during these ten years. While not yet available on the Block Group Level, 2010 Census Data indicates that this trend has continued since 2000.

MAP 4-4

Percent Change in Minority Concentration (1990-2000)



Source: U.S. Census and City of Lowell, DPD



In 2003, the City undertook the development of a Comprehensive Master Plan that addressed this concentration minority populations by presenting findings and recommendations that will assist in reducing the concentration of subsidized housing in Lowell. The Master Plan details a housing strategy based on feedback received through community-based planning efforts, such as focus groups and surveys, and an extensive data collection and research phase. The City is currently in the process of updating this Master Plan. Included in the Master Plan are several recommendations concerning the decentralization of low-income housing in the central block groups in Lowell in order to discourage the continuation of clusters of poverty including:

- Housing for very low and low-income families should be distributed in lower density, smaller structures.
- Adopt an inclusionary zoning provision that requires large-scale projects to commit a small percentage of units to permanent affordable housing.
- Lowell and its neighboring towns should commit to expanding the supply of affordable housing at a range of income levels to stabilize the regional housing market.
- Support efforts to promote increased market-rate housing development in areas where the concentration of subsidized housing causes an imbalance or concentration of poverty.

The City of Lowell's current Zoning Ordinance, adopted in December 2004, strongly encourages market rate residential development in the Downtown area. An increased emphasis on mixed income housing Downtown will help to increase the overall housing stock in Lowell. In addition, the Planned Residential Development regulations allow for greater density when creating public or common open space.

Concentration of Subsidized Housing: Progress since 2000

Since 2000, the City of Lowell has made a concerted effort to deconcentrate poverty clusters and minority concentrations in the lower per capita income census tracts in Central Lowell. The City's current Master Plan includes the recommendation to actively promote and distribute affordable housing throughout the city and the region, thereby discouraging the creation of clusters of poverty.

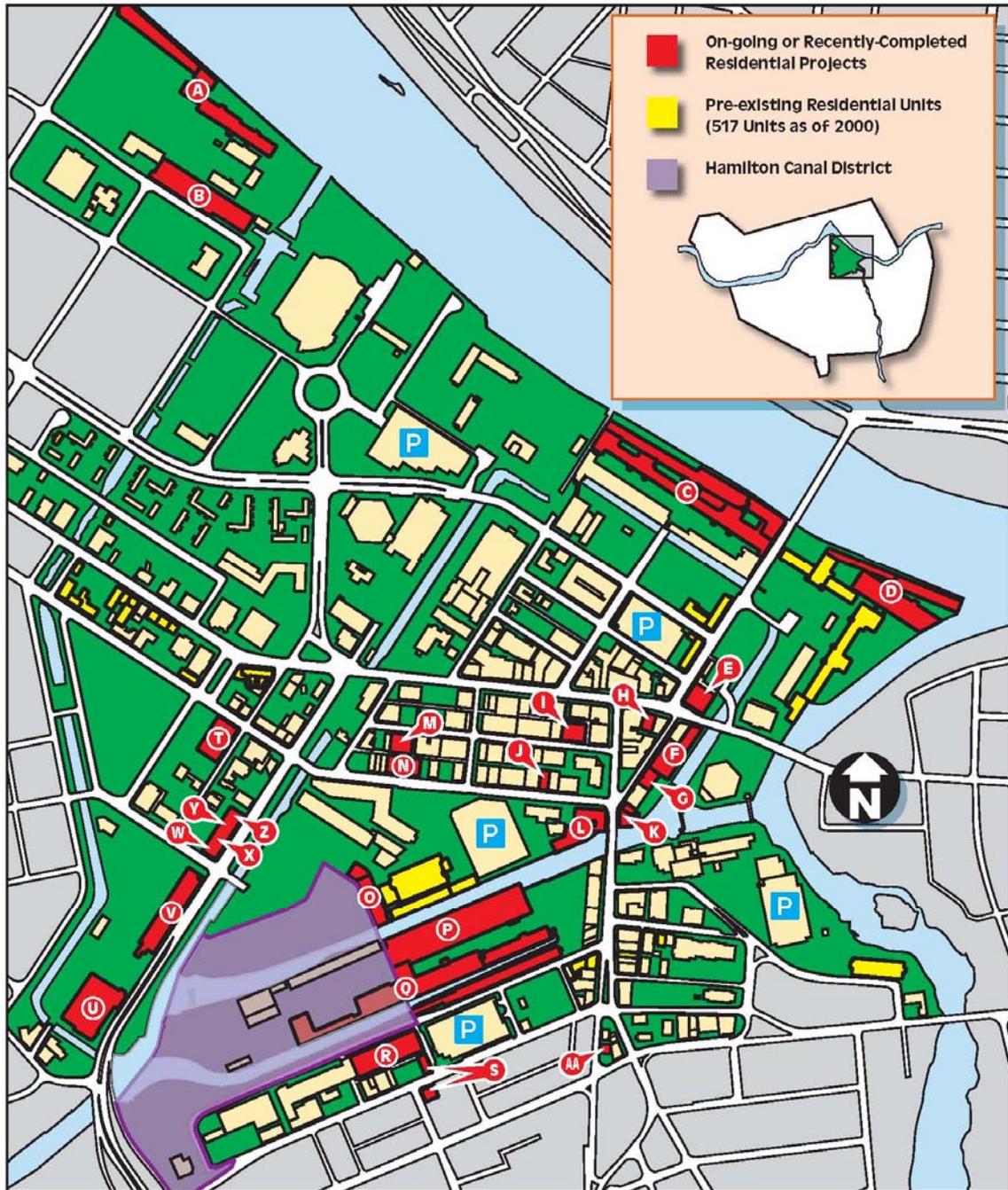
In the Downtown census tracts, 1,644 new market- priced units have been completed over the past decade. In 2000, according to the 2000 U.S. Census, there were 3260 total units in the same block group, 517 of which were market rate. Therefore, since 2000, the number of market rate units in downtown has increased by over 300%. The addition of these predominantly market rate units contribute significantly to the deconcentration of the existing conditions of poverty and minority concentrations. Most importantly, these newly constructed market-rate units did not displace any of the affordable units in the area.

Although there has been a concerted effort on the part of the City to encourage and support these development projects, the economic climate of late has adversely impacted the resources available to carry out this objective, especially since 2008. However, there has been substantial progress made overall, as Map 4-5 and Table 4-10 illustrate.

Moving forward, the City will continue to work to expand the presence of market-rate residential units in downtown Lowell. The Jackson Appleton Middlesex Urban Revitalization Plan, The Hamilton Canal District and the Acre Revitalization Plan are three downtown neighborhood revitalization strategies, which include substantial market rate housing development. These plans, discussed previously in this chapter, offer economic incentives and job creation components. The Hamilton Canal District project alone is set to add approximately 750 residential units to the downtown area. Currently, only 20% of those 750 will be subsidized, but this number is subject to change as the project moves forward. The establishment of a solid middle class in these areas with a safe and active downtown will hopefully stabilize this area for the long term.

MAP 4-5:

NEW AND PRE-EXISTING MARKET-RATE RESIDENTIAL UNITS IN DOWNTOWN LOWELL



Source: City of Lowell, Department of Planning and Development

Table 4-10

NEW AND PRE-EXISTING MARKET-RATE RESIDENTIAL UNITS IN DOWNTOWN LOWELL

Project Location on the Map	Project Name	Project Address	Total Private Investment (Million)	Number and Type of Units	Average Selling Price or Rent	Average Selling Price per Sq. Ft.
A	Renaissance on the River	Aiken & Perkins Street	\$25	152 condos	\$225,000	\$202
B	Perkins Street Apartments	21-30 Perkins Street	TBD	193 Rentals	TBA	—
C	Boott Mills East / Boott Mills West	Foot of John Street	\$50	154 rentals (East) 106 condos (West)	\$1,225/ \$263,000	— \$188
D	Massachusetts Mills III	170 Bridge Street	TBD	TBD	TBD	—
E	Fairburn Building	10 Kearney Square	\$3.5	25 Condos	\$243,000	\$250
F	Former Lowell Sun Offices	15 Kearney Square	TBD	19 Condos	TBD	TBD
G	Clafin Block	78 Prescott Street	\$2.5	14 Condos	\$395,000	\$395
H	DL Page Building	16 Merrimack Street	\$1.5	12 Condos	\$128,750	\$326
I	Moller's Lofts	23 Middle Street	\$4	24 Condos	\$209,000	\$219
J	Birke's Lofts	59 Market Street	\$2	13 Condos	\$250,000	\$250
K	One City Square	98 Central Street	\$2	9 Condos	\$350,000*	\$250*
L	Trio	26 Market Street	\$4	14 Condos	\$366,000*	\$325*
M	Ayer Lofts	158-172 Middle St	\$4.6	51 Condos	\$193,700	\$200
N	Market Gallery	165 Market Street	\$3.5	27 Condos	\$367,000	\$265
O	Canal Place III	200.1 Market Street	\$11	124 Condos	\$157,000	\$212
P	Loft Twenty Seven	27 Jackson Street	\$45	171 Rentals	\$1,500	—
Q	The Hamilton Canal Lofts I & II	26 & 165 Jackson Street	TBD	241 Rentals	\$1,500	—
R	Cotton House Lofts I & II	240 Jackson Street	\$11	61 Condos	\$210,000 (I); \$225,000 (II)	— \$140
S	JAMARTS	155 & 166 Middlesex Street	\$2	11 Condos	\$185,000*	TBD
T	Roark Building	338 Market St	\$1.5	12 Rentals	\$1,000	—
U	American Textile Museum Lofts	491 Dutton Street	\$2	45 Condos	\$350,000*	\$250*
V	305 Dutton St	305 Dutton Street	\$14	135 Rentals	\$1,000	—
W	Richardson Block	295 Dutton Street	\$1.3	10 Rentals	\$1,200	—
X	Ladd's Gallery	289 Dutton Street	\$0.6	3 Condos	\$194,000	\$229
Y	Artist Alley	269 Dutton Street	\$0.6	4 Condos	\$166,000	\$207
Z	Dutton St Lofts	261 Dutton Street	\$0.5	8 Condos	—	—
AA	Shanley Building	30-38 Gorham Street	\$0.75	6 Rental	\$1,200	—

* Estimated Values

Total New Market-Rate Residential Units (2000-2010):	1,644
Pre-Existing Residential Units:	517
Total Private Investment:	\$183 million
Estimated Number of New Downtown Residents <i>(Calculated based on 2000 U.S. Census' average household size for the downtown census tract multiplied by the total number of new units.)</i>	3,140

Source: City of Lowell, Department of Planning and Development

While the City has made substantial progress toward deconcentrating subsidized housing Downtown, a recommendation is once again included in the 2011 AI suggesting that the City continue to encourage the development of a variety of housing options for individuals of mixed incomes—especially in areas of high concentrations of minority and low-income populations. As the Table 4-11 illustrates, the percentage of minorities in the City of Lowell is significantly greater than that of other communities in the Lowell, MA-NH PMSA.

Municipality	Total Population	White	Minority	Hispanic Population	% Minority
Billerica	40,243	36,285	3,958	1035	12.4%
Chelmsford	33,802	29,944	3,876	686	13.5%
Dracut	29,457	26,610	2,847	1149	13.6%
Dunstable	3,179	3,031	148	44	6.0%
Groton	10,646	10,111	489	193	6.4%
Lowell	106,519	64,240	42,279	18,396	57.0%
Pelham, NH	12,897	12,387	510	243	5.8%
Pepperell	11,497	11,082	415	194	5.3%
Tewksbury	28,961	27,327	1,634	602	7.7%
Tyngsborough	11,292	10,390	902	265	10.3%
Westford	21,951	18,678	3,273	333	16.4%
TOTAL:	310,444	250,085	60,331	23,140	26.9%

Source: 2010 Census

Census tract data from the 2010 Census further illustrates that the concentration of minorities in Lowell is higher than surrounding communities. Table 4-12 illustrates this point. Furthermore, even the Belvidere neighborhood (Census Tract 3125), with the City’s smallest percentage of minorities (23%) has a higher concentration of minorities than any other community in the Lowell MA-NH PMSA.

Table 4-12: 2010 Minority Concentration by Census Tract in Lowell

TRACT	Neighborhood	POP	Minority	% Minor.
3101	Downtown	5,267	3143	59.70%
3102	Christian Hill	5,976	2851	47.70%
3103	Centralville	6,016	3448	57.30%
3104	Centralville	3,245	2491	76.80%
3105	Pawtucketville	3,449	1459	42.30%
3106	Pawtucketville	11,571	4167	36.00%
3107	Acre	4,441	2950	66.40%
3108	Acre	n/a	n/a	n/a
3110	Acre	n/a	n/a	n/a
3111	Acre	2,410	2337	97.00%
3112	L. Highlands	3,267	2913	89.20%
3113	Highlands	4,057	2782	68.60%
3114	Highlands	5,986	3818	63.80%
3115	Highlands	2,974	1651	55.50%
3116	Highlands	5,295	2481	46.90%
3117	L. Highlands	5,098	3898	76.50%
3118	L. Highlands	3,513	3074	87.50%
3119	Back Central	2,429	1553	63.90%
3120	Back Central	2,938	1915	65.20%
3121	Sacred Heart	3,149	2130	67.60%
3122	Sacred Heart	4,309	2274	52.80%
3123	South Lowell	4,931	1593	32.30%
3124	L. Belvidere	2,354	1928	81.90%
3125	Belvidere	8,424	1938	23.00%
3883	Acre	5,420	3881	71.60%
City of Lowell				
City of Lowell		106,519	60,675	57.00%

*note: A change was made to the Census tracts within the City of Lowell for the 2010 Census. Census tracts 3108 and 3110 (in the Acre) were combined into a single Census tract: 3883.

Source: US Census 2010

4.2 PRIVATE SECTOR

4.2.1 HMDA DATA ANALYSIS

To determine if there are banking and insurance policies pertaining to the financing, sale, purchase, rehabilitation, and rental of housing that may affect fair housing choice within the City, an analysis of Home Mortgage Disclosure Act (HMDA) data was performed for the City of Lowell. The Federal Home Mortgage Disclosure Act requires lending institutions to make public disclosures of their home mortgage and home improvement lending activity. These public disclosures are summarized by the Federal Financial Institutions Examination Council (FFIEC) and made available to the public. HMDA data describes lending practices at the regional Metropolitan Statistical Area level and at the local census tract level.

The 2006 AI provided extensive discussion of lending practices in the Lowell MA-NH, PMSA a region including the towns of Billerica, Chelmsford, Dracut, Dunstable, Groton, Lowell, Pelham, NH, Pepperell, Tewksbury, Tyngsborough, and Westford. Data was available at the Census Tract level based on the 2000 US Census as well as 2003 regional data from the FFIEC. This same level of data was not available for the 2011 AI. 2010 Census data was not available at the Census Tract level and FFIEC data, current as of 2009, was not available for the smaller PMSA used in the 2006 AI. Instead FFIEC 2009 data includes Lowell in the Metropolitan Statistical Area for Cambridge-Newton-Framingham which includes a larger pool of communities at various levels of income and diversity.

HMDA data for the 2009 period is examined for potential discriminatory lending practices based on race and income. The following aggregate tables were extracted from the FFIEC website and will be examined in this report:

* Aggregate Tables 4-1 and 4-2: Disposition of Applications for FHA, FMHA, and VA Home-Purchase Loans, and Conventional Home-Purchase Loans for 1-4 Family Homes by Race, and Gender of Applicant

* Aggregate Tables 5-1 and 5-2: Disposition of Applications for FHA, FMHA, and VA Home Purchase Loans, and Conventional Home-Purchase Loans for 1-4 Family Homes by Race and Income of Applicant

* Aggregate Tables 8-1 and 8-2: Reasons for Denial of Applications for FHA, FMHA, VA Home-Purchase Loans, and Conventional Home-Purchase Loans for 1-4 Family Homes by Race, Gender, and Income of Applicant

This data is summarized in single loan categories in tables 4-13, 4-14, and 4-15.

Table 4-13 represents all of Cambridge-Newton-Framingham MSA loan activity for FHA, FMHA, VA, and Conventional home purchase loans. It shows that minority loan applications are 17% of the total 7,066 loan applications made in the region during 2009. This is much lower than the percentage of minority population for the MSA as a whole (30%). The loan origination rate for all minorities is 62% as compared to an origination rate of 69% for white applicants. Denial rate for all minorities is 17% compared to a 12% white denial rate. Asian, Black, and Hispanic populations experienced a denial rate of 17%, 19%, and 16% respectively. Without analyzing additional years of HMDA data it is difficult to make a conclusion that minorities as a whole have experienced discrimination. While further investigation would need to be conducted to determine if these populations are experiencing discrimination, the major reasons for denials, addressed in Table 4-15 do not appear to differ greatly among the region's minority and white populations.

Table 4-13: 2009 Regional Home Purchase Data by Race

Race	Total Applications Received	Loans Originated		Applications Approved but Not Accepted		Applications Denied		Applications Withdrawn		Applications Closed as Incomplete	
		#	%	#	%	#	%	#	%	#	%
American Indian/Alaskan Native	20	11	55%	0	0%	7	35%	2	10%	0	0%
Asian	464	292	63%	43	9%	80	17%	38	8%	11	2%
Black	229	128	56%	17	7%	44	19%	32	14%	8	3%
Hispanic	17	9	53%	3	18%	4	24%	1	6%	0	0%
White	5112	3547	69%	485	9%	604	12%	407	8%	69	1%
More Minority Races	9	6	67%	0	0%	2	22%	1	11%	0	0%
Joint (White/Minority)	137	96	70%	13	9%	16	12%	11	8%	1	1%
Race Not Available	345	221	64%	28	8%	55	16%	31	9%	10	3%
Race Not Available	733	478	65%	77	11%	93	13%	68	9%	17	2%
Minorities	1221	763	62%	104	9%	208	17%	116	10%	30	2%
All Races	7066	4788	68%	666	9%	905	13%	591	8%	116	2%

Source: FFIEC 2009 Aggregate Tables 4-1 & 4-2
 Note: Region includes the Cambridge-Newton-Framingham MSA

Table 4-14 illustrates home purchase loan data by race and income. This table is used to examine further whether minorities are being denied loans based on their race/ethnicity or whether income is correlated to the lower percentages of loans, origination and denial rates. The largest variation in loan origination and denial rates appear to occur among households earning 100-119% of the MSA median income with a difference among white and minority households of 14% and 11% for loans originated and applications denied, respectively. Households at all other income levels experienced similar rates for loans originated and loans denied.

Table 4-14: 2009 Regional Home Purchase Data by Race and Income

Race/Ethnicity	Total Applications Received	Loans Originated		Applications Approved but not Accepted		Applications Denied		Applications Withdrawn		Applications Closed as Incomplete	
Less than 50% of MSA Median Income											
American Indian/Alaskan Native	1	0	0%	0	0%	1	100%	0	0%	0	0%
Asian	68	45	66%	5	7%	12	18%	4	6%	2	3%
Black	43	16	37%	5	12%	12	28%	8	19%	2	5%
Native Hawaiian/Other Pacific Islander	4	2	50%	1	25%	1	25%	0	0%	0	0%
White	545	314	58%	51	9%	108	20%	62	11%	10	2%
Two or More Minority Races	4	1	25%	0	0%	2	50%	1	25%	0	0%
Joint (White/Minority)	9	4	44%	0	0%	3	33%	2	22%	0	0%
Hispanic/Latino	100	51	51%	10	10%	25	25%	10	10%	4	4%
Race Not Available	61	30	49%	5	8%	14	23%	11	18%	1	2%
Total/Average - Minorities	229	119	52%	21	9%	56	24%	25	11%	8	3%
50-79% of MSA Median Income											
American Indian/Alaskan Native	8	6	75%	0	0%	0	0%	2	25%	0	0%
Asian	144	86	60%	17	12%	27	19%	12	8%	2	1%
Black	109	59	54%	11	10%	20	18%	15	14%	4	4%
Native Hawaiian/Other Pacific Islander	9	5	56%	1	11%	2	22%	1	11%	0	0%
White	1528	1034	68%	148	10%	194	13%	131	9%	21	1%
Two or More Minority Races	3	3	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	23	21	91%	0	0%	0	0%	2	9%	0	0%
Hispanic/Latino	158	110	70%	15	9%	16	10%	14	9%	3	2%
Race Not Available	172	115	67%	20	12%	19	11%	14	8%	4	2%
Total/Average - Minorities	454	290	64%	44	10%	65	14%	46	10%	9	2%
80-99% of MSA Median Income											
American Indian/Alaskan Native	1	1	100%	0	0%	0	0%	0	0%	0	0%
Asian	86	60	70%	7	8%	9	10%	10	12%	0	0%
Black	41	26	63%	0	0%	8	20%	7	17%	0	0%
Native Hawaiian/Other Pacific Islander	2	2	100%	0	0%	0	0%	0	0%	0	0%
White	944	671	71%	81	9%	103	11%	75	8%	14	1%
Two or More Minority Races	0	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	18	17	94%	0	0%	1	6%	0	0%	0	0%

Hispanic/Latino	39	26	67%	1	3%	9	23%	2	5%	1	3%
Race Not Available	138	97	70%	13	9%	14	10%	9	7%	5	4%
Total/Average - Minorities	187	132	71%	8	4%	27	14%	19	10%	1	1%
100-119% of MSA Median Income											
American Indian/Alaskan Native	35	22	63%	1	3%	9	26%	3	9%	0	0%
Asian	36	21	58%	1	3%	9	25%	3	8%	2	6%
Black	10	7	70%	0	0%	2	20%	1	10%	0	0%
Native Hawaiian/Other Pacific Islander	1	0	0%	1	100%	0	0%	0	0%	0	0%
White	755	574	76%	72	10%	67	9%	36	5%	6	1%
Two or More Minority Races	0	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	28	15	54%	6	21%	3	11%	3	11%	1	4%
Hispanic/Latino	22	17	77%	0	0%	3	14%	2	9%	0	0%
Race Not Available	112	75	67%	10	9%	17	15%	8	7%	2	2%
Total/Average - Minorities	132	82	62%	9	7%	26	20%	12	9%	3	2%
120% or More of MSA Median Income											
American Indian/Alaskan Native	2	2	100%	0	0%	0	0%	0	0%	0	0%
Asian	104	64	62%	12	12%	19	18%	7	7%	2	2%
Black	24	19	79%	1	4%	2	8%	1	4%	1	4%
Native Hawaiian/Other Pacific Islander	1	0	0%	0	0%	1	100%	0	0%	0	0%
White	1320	946	72%	131	10%	132	10%	98	7%	13	1%
Two or More Minority Races	2	2	100%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	57	37	65%	7	12%	9	16%	4	7%	0	0%
Hispanic/Latino	24	17	71%	2	8%	2	8%	2	8%	1	4%
Race Not Available	235	157	67%	29	12%	26	11%	20	9%	3	1%
Total/Average - Minorities	214	141	66%	22	10%	33	15%	14	7%	4	2%

Source: FFIEC 2009 Aggregate Tables 5-1 & 5-2
Note: Region includes the Cambridge-Newton-Framingham MSA

Table 4-15 summarizes common explanations for loan denials. As the data demonstrates, whites and minorities as a group, experience the same reasons for denial at similar rates, indicating that discrimination is not a major factor in loan denials.

Table 4-15: 2009 Reasons for Denial of Home Purchase Loans for Region by Race																			
Race/Ethnicity	Total Apps Denied	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Info		Credit App Incomplete		Mortgage Insurance Denied		Other	
American Indian/Alaskan Native	10	0	0%	1	10%	2	20%	3	30%	1	10%	1	10%	0	0%	0	0%	2	20%
Asian	80	24	30%	2	3%	4	5%	16	20%	5	6%	3	4%	4	5%	2	3%	20	25%
Black	36	12	33%	4	11%	1	3%	7	19%	1	3%	4	11%	3	8%	0	0%	4	11%
Native Hawaiian/Other Pacific Islander	4	1	25%	0	0%	0	0%	2	50%	0	0%	0	0%	1	25%	0	0%	0	0%
White	619	143	23%	19	3%	70	11%	181	29%	23	4%	13	2%	30	5%	1	0%	139	22%
Two or More Minority Races	2	2	100%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%	0	0%
Joint (White/Minority)	22	6	27%	1	5%	1	5%	7	32%	2	9%	0	0%	0	0%	0	0%	5	23%
Hispanic/Latino	54	16	30%	4	7%	3	6%	15	28%	5	9%	1	2%	5	9%	0	0%	5	9%
Race Not Available	97	22	23%	2	2%	12	12%	28	29%	6	6%	5	5%	3	3%	0	0%	19	20%
Total/Average - Minorities	208	61	29%	12	6%	11	5%	50	24%	14	7%	9	4%	13	6%	2	1%	36	17%
Total/Average - All Races	924	226	24%	33	4%	93	10%	259	28%	43	5%	27	3%	46	5%	3	0%	194	21%

Source: FFIEC Aggregate Tables 8-1 & 8-2 (2009 Data)

Note: In 2009 FFIEC included Lowell in the Cambridge-Newton-Framingham MSA

4.2.2 PREDATORY LENDING & FORECLOSURES

The 2006 AI noted that in communities such as Lowell, the number of "sub prime" loans increased well above the state average. Sub prime loans are higher-interest-rate mortgages offered to consumers with credit problems or limited incomes that may benefit the borrower by expanding credit. This above average increase in subprime loans was attributed to the larger minority and low-income populations in the community by the Merrimack valley Housing Partnership. Predatory loans have higher interest rates, excessive closing costs, prepayment penalties, fees, or balloon payment requirements and may include deception, fraud, or manipulation. These unfavorable loans are targeted at the elderly, minority and low-income homeowners who have financial troubles, are not fluent in English, or are otherwise intimidated by the process of securing a conventional mortgage. Unfavorable terms and higher interest rates can ultimately cause homeowners to lose their homes or the equity built up over decades.

In the 2006 AI, the City proactively recommended to increase the already on-going predatory lending awareness efforts, specifically by supporting programs and campaigns that educate first time homebuyers and at-risk populations. Following this recommendation, the City has taken a proactive role in several predatory lending awareness efforts and foreclosure prevention activities over the past several years.

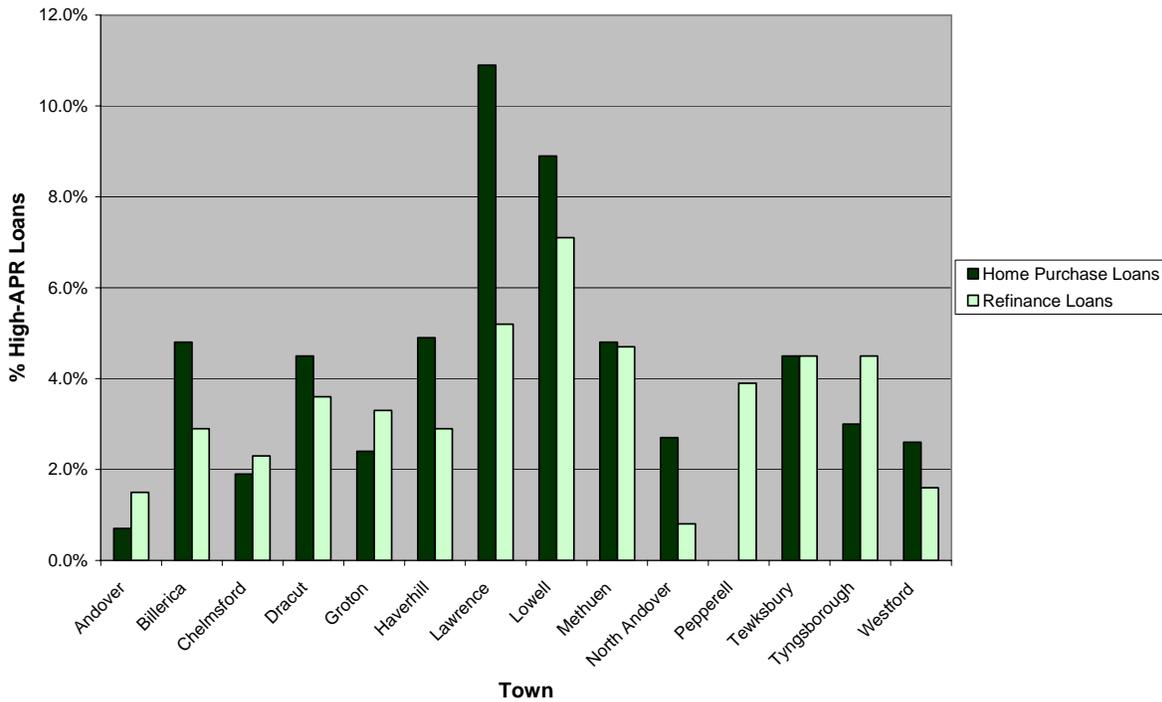
Lowell's Department of Planning and Development operates the First Time Buyer Program for low- and moderate- income households, applying HOME funds toward downpayment assistance. The City's program has built a strong partnership with the Merrimack Valley Housing Partnership, a local non-profit service agency that provides pre-purchase counseling to potential homebuyers. During a recent HUD monitoring of its program, no deficiencies were found and MVHP is listed among agencies participating in HUD's Housing Counseling Program. Households are required to have completed counseling through MVHP prior to applying to the City for downpayment assistance. This relationship has ensured that potential homebuyers are well informed of the home buying and mortgage process and has been key to the accomplishments of the City's program.

Despite the success and promise of initiatives like the First Time Homebuyer Program, however, homebuyers, most of who do not seek pre-purchase counseling or training, have fallen victim to sub-prime mortgages.

The Massachusetts Community & Banking Council's 2010 report "Mortgage Lending to Traditionally Underserved Borrowers & Neighborhoods in Boston, Greater Boston and Massachusetts, 2008" provides data and analysis on High-APR Loans granted to residents across Massachusetts. The data in this report reveals that, compared to surrounding towns, Lowell had the largest percentage of High-APR refinance loans and the second largest percentage of High-APR home purchase loans. When compared to other large cities in Massachusetts, Lowell ranks third in its percentage of High-APR home purchase loans and fifth in its percentage of High-APR refinance loans. Furthermore, the data from this report indicates that these High-APR Loans are most prevalent amongst minority and low/mod populations across Massachusetts, indicating that certain groups are in fact targeted for subprime lending. Please refer to the tables below for an illustration of Lowell's High-APR Loans.

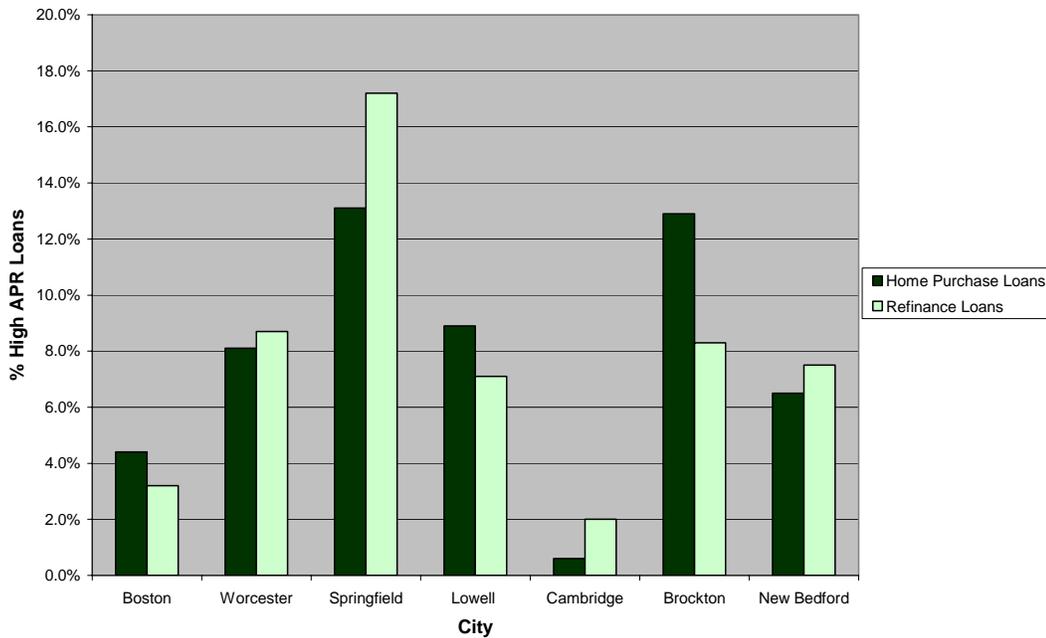
High-APR Loans in Massachusetts, Lowell & Surrounding Towns

Source: Massachusetts Banking & Community Council, 2008



High-APR Loans, 7 Largest Cities in MA

Source: Massachusetts Banking & Community Council, 2008



Within the last few years, local area housing providers have noted that lending institutions have become much more conservative and that instances of predatory lending have decreased drastically. In fact, the current lending climate has experienced such a dramatic shift that it is currently difficult for anyone—even qualifying individuals—to obtain a home loan. It has been suggested that in some ways, the pendulum may have swung too far in the opposite direction in reaction to the predatory lending and resulting foreclosures of late.

Foreclosure Rates in Lowell

As mentioned, these High-APR or “sub prime” loans have acted as catalysts in the foreclosure crisis. Additionally, high foreclosure rates can more generally be attributed to the high cost of housing when related to total household income, especially when coupled with the high unemployment rate. While housing costs and living costs continue to increase, average families are finding it more and more difficult to cover monthly mortgage payments. As table 4-16 below illustrates, almost 40% of homeowners and renters in Lowell live in units that cost more than 35% of their total earnings.

Table 4-16: Residential Units with a High Cost Burden in Lowell				
Units with Housing Costs Exceeding 35% of Total Household Income				
	Total Units	Units Surveyed	Units Exceeding 35% Cost Burden	% of Units Exceeding 35% Cost Burden
Owner Occupied	18,900	13,928	4,698	33.70%
Renter Occupied	18,302	17,985	6,880	38.30%

Source: 2005-2009 American Community Survey

In 2008 the City had the fifth highest percentage of auctions in Massachusetts and the second largest amount of foreclosure deeds filed in the Merrimack Valley region of the state. In 2009, foreclosure rates stagnated and even decreased slightly due to government intervention and a forced moratorium on some lending institutions. Despite these efforts, however, the rate of foreclosures nationwide once again took a turn for the worse in 2010. The table below illustrates these trends between January of 2008-July of 2010.

Table 4-17: Foreclosures in Lowell, 2008-2010					
January - July 2008		January - July 2009		January - July 2010	
Lowell	District	Lowell	District	Lowell	District
229	149	141	84	220	181

Source: Northern Middlesex Registry of Deeds, August 2010
 Note: "District" includes 9 communities with NMRD jurisdiction, excluding Lowell

Currently, a large number of foreclosures have stalled mid-process pending the findings of a major national lawsuit. Because of this, it is widely believed that the foreclosure rate could experience a dramatic spike sometime in the first six months of 2011, once a finding is issued in this case and stalled foreclosures are able to move forward.

The City of Lowell's Response to the Foreclosure Crisis

To combat this problem, the Lowell Foreclosure Prevention Task Force was initiated by members of the local banking, government, and non-profit service sectors. The Task Force is charged with conducting public awareness campaigns to educate homebuyers about counseling and financial resources available. The Task Force, in collaboration with the Northern Middlesex Registry of Deeds, monitors existing mortgages, particularly those with adjustable rates and has contacted homebuyers at risk of losing their homes. A 24-hour hotline, Homeowner's Hope Hotline, has been set up to provide counseling and referrals to homeowners seeking assistance. Assistance is available in a variety of forms including financial counseling, applying to Mass Housing Home Saver Program, negotiations with an existing mortgagor to refinance or modify terms, or negotiating a short sale, among others. In the event that retaining the home is not feasible, the homeowner is referred to the Coalition for a Better Acre, Lowell's Neighborworks America affiliate, or Community Teamwork, Inc., a local multi-service provider that operates a rental assistance program to assist the household in transitioning to a rental unit.

The Task Force has also partnered with the Lowell Development and Financial Corporation to offer gap financing to assist homeowners facing foreclosure to refinance into fixed-rate conforming loans from local lenders. The homeowners are carefully matched with loans that they can afford and the LDFC finances a small \$2,500-10,000 second mortgage to close any gaps between the amount needed and the amount the homeowner can afford to borrow. The Department of Planning and Development (DPD) will continue its collaboration with MVHP to assist new homebuyers through the purchase process and working with the Task Force to help existing homeowners find the best solutions to their problems.

In 2009 the City applied for and received \$1.2 million in Neighborhood Stabilization Program funds through the Department of Housing and Development to help address the impact that the foreclosure crisis has had on local neighborhoods. NSP funds, available through the Housing and Economic Recovery Act of 2008 are being used to help redevelop a number of vacant and foreclosed properties. Approximately 25 new units of affordable housing are expected to be generated as a result of this program. In addition, the City received \$200,000 in NSP Strategic Demolition funds to demolish vacant properties that jeopardize the health, safety, and quality of Lowell neighborhoods. Approximately 10 properties are planned to be demolished within the next six months using these resources.

Lastly, DPD is also involved in an interdepartmental City effort to address the potential problems associated with abandonment and neglect of properties in neighborhoods following foreclosures. The City is instating specific inspection protocols for these properties, establishing and maintaining databases of troubled and abandoned buildings, and working with property owners, including lenders, to make sure that the impact of these properties on their surrounding neighborhoods is minimized and mitigated. DPD's Development Services group has launched a multi-faceted effort including proactive inspections, aggressive enforcement of the vacant and foreclosing property ordinance, fining of non-compliant lenders, and development of a receivership program to mitigate this problem in the City.

4.3 PUBLIC AND PRIVATE SECTOR

4.3.1 FAIR HOUSING ENFORCEMENT & FAIR HOUSING OUTREACH

As discussed in Chapter III, the Massachusetts Commission Against Discrimination (MCAD) has received few fair housing complaints from Lowell residents in the past five years. The limited number of grievances on file may be due to the fact that complaints must be filed in person at MCAD's office in Boston. In addition, a very small percent of discrimination is reported as most protected classes do not know that they have been discriminated against or do not know what constitutes discrimination. Because of this, it is important that a system for monitoring and enforcing fair housing activity in Lowell is established.

Since the 2006 AI, the City of Lowell has made some progress toward addressing the lack of a fair housing advocate. Community Teamwork, Inc. (CTI) a local multi-service non-profit established fair housing education programs through its Fair Housing Advocate position. Although these services proved successful, recent constraints and a lack of funding for this initiative at CTI have meant that the organization is no longer in a position to provide the type of comprehensive fair housing outreach needed in the City of Lowell. However, CTI continues to provide fair housing support through some of its other housing related programs and services.

Still needing to institute a system for disseminating fair housing information and centralizing access to resources and information regarding fair housing for the general public, the City sought the assistance of the Fair Housing Center of Greater Boston. During the 2006-07 program year, the City awarded the FHCGB CDBG funds to conduct outreach and educational activities on the issue of housing discrimination. Trainings targeting local non-profit housing providers, members of the Greater Lowell Landlords Association, employees at the Lowell Housing Authority, and members of the Northeast Association of Realtors, as well as an extensive media campaign took place.

Technical assistance and trainings provided through the FHCGB continued during the 2007-08 program year with more emphasis on building relationships with nonprofit providers and developing outreach materials and handouts. The FHCGB also teamed up with the Merrimack Valley Housing Partnership, a local agency that provides first time homebuyer training and counseling, to create an additional element to their curriculum focusing on fair housing rights and responsibilities. 500 families received this training during this fiscal year. In addition FHCGB worked with MVHP staff to implement a screening process to determine if someone has experienced discrimination during their housing/mortgage search.

During the 2008-09 fiscal year, the FHCGB held a training for the Lowell Planning Board members. This training focused on how local planning policies and decisions can impact the availability and accessibility of housing.

Although several nonprofits and other local housing industry affiliates do provide different types of fair housing outreach and services, The City of Lowell is still in need of a centralized organization that could adequately address and fair housing concerns and provide outreach and education to the community. Because of this remaining

impediment to fair housing, the City of Lowell is in the process of working with the Fair Housing Center of Greater Boston to establish a permanent satellite location within the City. A further discussion of the status of this satellite location can be found in chapter six of this document.

4.3.2 VISITABILITY IN HOUSING

HUD endorses the "visitability" concept, which is a voluntary standard promoted by the Department in 2 and 3 family new construction and existing structures. Visitability means that:

- at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk and
- the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space.

Visitability allows mobility-impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also serves persons without disabilities (for example, a mother pushing a stroller, a person delivering large appliances, a person using a walker, etc.). One difference between "visitability" and "accessibility" is that accessibility requires that all features of a dwelling unit be made accessible for mobility-impaired persons. A visitable home provides less accessibility than an accessible home, and is meant to be those units not required to be accessible."

The City has not adopted formal guidelines regarding visitability/accessibility that go beyond what is required by the basic "handicapped accessibility" laws for CDBG and HOME funded residential development of more than four units. Other than what is required by Massachusetts Building codes, the City does not require visitability/accessibility standards for new construction of private residential developments or rehabilitation of properties with 3 or fewer units. However, when possible, The City of Lowell encourages developers to follow visitability standards when constructing new units.

4.3.3 FEDERAL FAIR HOUSING AND EQUAL OPPORTUNITY REQUIREMENTS

The Department of Housing and Urban Development requires municipalities that receive federal funding to comply with the Fair Housing Act and related anti-discriminatory regulations. The City is taking steps to ensure compliance with these programs by developing and updating documents that guide the City's practices in meeting the needs of protected classes.

Section 504 of the Rehabilitation Act of 1973 provides that no otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. Recipients of HUD financial assistance must take all steps necessary to ensure that their programs, services and activities comply with Section 504 to the maximum extent possible. The City's Section 504 Plan, originally adopted in 1994, contains grievance procedures and resolution processes for addressing discrimination and harassment complaints. In the administration of its HUD programs, the City ensures that both planning processes and

funded programs are accessible. The City also not discriminate against organizations seeking funding through its HUD programs.

Executive Order 13166 titled "Improving Access to Services by Persons with Limited English Proficiency" requires communities that receive federal funding to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Communities are also directed "to prepare a plan to improve access to...federally conducted programs and activities by eligible LEP persons." While the City currently lacks a formalized LEP Plan, several processes are in place to ensure equal access for LEP persons. Currently the City posts public notices regarding federally funded programs and Annual Action Plan procedures in Spanish, Portuguese, Khmer and English. Interpreters for both non-English speaking and hearing-impaired individuals are also provided at public hearings when requested. For more information on the formalization of an LEP Plan, please refer to Chapter Six of this document.

4.4 RESOLUTION OF PAST FINDINGS

Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of non-compliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973, or where the Secretary has issued a charge under the Fair Housing Act regarding assisted housing within a recipients jurisdiction, this document should include an analysis of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds by the jurisdiction

No such determination or finding has been issued against the City of Lowell.

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

5.1 SUMMARY OF PUBLIC COMMENTS ON FAIR HOUSING OUTREACH AND ADVOCACY:

The City of Lowell currently lacks a centralized fair housing organization. While multiple service providers throughout the region do incorporate fair housing trainings and outreach into their programming, the City is still in great need of an organization equipped to handle fair housing enforcement and outreach services.

During the preparation of the 2006 AI, the following comments regarding the lack of fair housing information and advocacy were made:

- Educational materials in languages other than English are needed
- Outreach organizers need to be familiar with other languages and cultures
- Cambodian immigrants have experienced incidences of steering, especially among recent immigrants seeking ownership units
- Individuals associated with some social service agencies experience discrimination
- The Greater Lowell Landlord's Association encourages landlords to access fair housing training through MCAD.

Of the above comments submitted during the 2006 AI Planning Process, the first three were once again mentioned during the most recent 2011 AI Planning Process. Additionally, some new comments were submitted during the update to this document and have been included below.

- Lack of fair housing educational opportunities for the community
- Lack of fair housing enforcement in the community
- Elderly tenants do not know their rights (Especially with regards to intimidation)
- Many first time home buyers that do not receive pre-purchase counseling are unaware of their fair housing rights and are therefore more vulnerable to acts of housing discrimination
- Tenants do not know their rights. There is a lack of tenant knowledge on fair housing law and how to address acts of housing discrimination
- Landlords do not know their rights and responsibilities, and many are unfamiliar with fair housing law
- Recent immigrants were often the victims of predatory lending, sometimes targeted by members of their own ethnic community.
- Disabled individuals would have difficulty acquiring suitable housing and navigating the process of applying for housing assistance without the help of local area service providers.
- There are areas of specific minority concentrations throughout the city. It is difficult to determine if minorities are choosing to live in these areas or if they are being steered there.
- For the most part, housing discrimination is no longer occurring in an overt manner. Instead, acts of housing discrimination have become more subtle.

Oftentimes, those carrying out the discriminatory acts are using otherwise legal means to deny individuals of their right to choose housing within their economic means.

5.2 SUMMARY OF FAIR HOUSING OUTREACH AND ADVOCACY PROVIDED BY LOCAL NON-PROFITS:

While the City of Lowell currently lacks a centralized fair housing agency, fair housing outreach and education is offered by several area non-profits and housing-related agencies. During the update to this document, it became evident that the overall lack of housing discrimination in Lowell is due largely to the services and support offered by these successful and hardworking nonprofits. Below is a summary of the fair housing services available at present. While this summary is not comprehensive, it does illustrate the multiplicity of fair housing services offered within the City of Lowell and throughout the Merrimack Valley region:

Fair Housing Center of Greater Boston

The Fair Housing Center of Greater Boston offers fair housing trainings and outreach to the City of Lowell. Past trainings include technical assistance for members of the Greater Lowell Landlords Association, employees at the Lowell Housing Authority, and members of the Northeast Association of Realtors. The FHCGB also teamed up with the Merrimack Valley Housing Partnership, a local agency that provides first time homebuyer training and counseling, to create an additional element to their curriculum focusing on fair housing rights and responsibilities. Approximately 500 families received this training each year. In addition FHCGB worked with MVHP staff to implement a screening process to determine if someone has experienced discrimination during their housing/mortgage search. Most recently, the FHCGB collaborated with the Cambodian Mutual Assistance Association to perform fair housing testing here in the community. The results of this testing confirmed that housing discrimination was in fact taking place against Asian immigrants. Collaborations between the FHCGB and local area nonprofits will continue to provide local residents with fair housing education and advocacy in the future.

Lowell Housing Authority

The Lowell Housing Authority manages several large affordable housing complexes throughout the City along with numerous smaller scattered sites for people of low to moderate incomes. The LHA has several systems in place to assure that it is in compliance with fair housing rules and regulations. Services and outreach are offered in several different languages in compliance with the LHA's required LEP (Limited English Proficiency) Plan. In terms of fair housing outreach and education, the LHA provides staff training in collaboration with the Fair Housing Center of Greater Boston. Additionally, the LHA is interested in providing trainings for its partner landlords and intends to look into this possibility in the spring of 2011. For clients, all Section 8 tenants are required to attend a fair housing orientation where they are given an informational packet describing their fair housing rights. Additionally, they are given the contact information for a staff member at the LHA that can assist them should they have further fair housing concerns. Lastly, if a client feels that they need to further peruse a fair housing complaint or issue, they are encouraged to contact HUD directly through a HUD-issued form which is made available in English, Spanish and Khmer. Overall, the LHA is committed to working with its tenants to ensure compliance with all fair housing laws and guidelines.

Community Teamwork, Inc: Housing Consumer Education Center

As part of the Regional Housing Network of Massachusetts network of regional housing agencies, CTI operates a Housing Consumer Education Center (HCEC) for Northern Middlesex and Essex Counties. The mission of the HCEC is to provide information that helps consumers make informed decisions about their housing situation. The Housing Consumer Education Center is a resource for tenants, landlords, and homeowners and provides information and referrals about housing related issues. CTI's HCEC staff provide expertise in housing search, emergency housing assistance, advocacy, counseling, and education programs. The HCEC offers a variety of programs that address critical housing needs, including fair housing outreach and services in collaboration with the Fair Housing Center of Greater Boston. Other services offered through CTI's HCEC include Foreclosure Prevention Counseling, First Time Homebuyer Classes, Home Modification for the Disabled and Emergency Assistance Programs.

Merrimack Valley Housing Partnership: First Time Homebuyer Classes & Downpayment Assistance

The Merrimack Valley Housing Partnership teaches a course for first time homebuyers called Project Genesis. It consists of 10 hours of instruction over four evening sessions and covers the following topics: Overview of the Home Buying Process, Mortgage Application Process, Down Payment Assistance Programs, Legal Aspects of Purchasing, Home Inspections, Household Budgeting, Building Good Credit, Insurance Requirements, Multi-Unit Housing Options and Responsible Home Ownership. These courses also contain a fair housing component to make first time homebuyers aware of their rights. The program is taught by MVHP staff as well as several volunteer real estate professionals. Instructors include lenders, attorneys, home inspectors, real estate brokers and others. The MVHP also partners with the Cambodian Mutual Assistance Association to offer these classes in multiple languages for the minority populations of the region.

Cambodian Mutual Assistance Association

Along with the First Time Homebuyer classes offered in collaboration with the Merrimack valley Housing Partnership, The Cambodian Mutual Assistance Association recently applied for funds from HUD for a new Fair Housing Education & Outreach Initiative. This new fair housing initiative would also function in partnership with the MVHP and will provide housing counseling services to Cambodian and other immigrant residents in Lowell. Services will include educational fair housing public service announcements through the Lowell Telecommunication Corporation's public access network, fair housing classes, and testing designed to evaluate whether or not housing discrimination is occurring here in the City. The fair housing classes will be offered in several languages and the CMAA will hire a new staff person to instruct these classes. While the CMAA was ultimately unsuccessful in acquiring these funds, they plan to re-apply next year.

City of Lowell, Council on Aging

The Council on Aging is a Senior Citizen's Center that provides services of nutrition, health, recreation, transportation, information, and referral programs to the elderly of Lowell. Fair Housing outreach and advocacy are included in the many services offered at the Senior Center. Staff at this facility are available to inform clients of their fair housing rights and also act as intermediaries in cases where alleged discrimination is

taking place. This advocacy service is critical for some elders, especially those who are fearful of retaliation from housing providers.

LifeLinks, Inc./ Northeast Independent Living Program

LifeLinks, Inc. and the Northeast Independent Living Program are two non-profit organizations offering supportive services to the disabled population of Lowell. Both of these organizations include fair housing outreach and advocacy as part of their services.

LifeLinks is an organization offering comprehensive services for disabled clients in the Lowell area. Among these services, LifeLinks is involved in the entire housing process from counseling and training, property searches, and assistance with filling out forms and other documents. Once a client has moved into a housing unit, LifeLinks also works with the landlord or property manager as much as possible to mediate situations and ensure that the situation remains positive for both the tenant and the renter. Staff members are well trained on the ins and outs of the housing process and have built and maintained healthy relationships with several area landlords. These relationships are incredibly important when new clients are searching for housing. More generally, LifeLinks also provides outreach and education to the housing community regarding fair housing and the steps involved in accommodating a disabled person in a housing unit.

The Northeast Independent Living Program (NILP) focuses on assisting disabled clients to live independently and successfully as integrated members of the community. NILP offers four core services to all its clients: Information and Referral, Peer Counseling, Skills Training and Advocacy. These services are interwoven and designed to meet each client's individualized needs. Fair housing services are integrated in each of the four core areas of service.

Merrimack Valley Legal Services

As the local Legal Aid, Merrimack Valley Legal Services (MVLS) offer guidance and referrals to residents who feel that they have experienced housing discrimination. MVLS lawyers work in family law, benefits work, public housing, consumer law, and with the elderly and disabled. Most MVLS clients are low to moderate income, and are usually either referred or come as walk-ins. While MVLS does handle some housing-related cases (evictions, bedbug cases), they are limited in the number of housing discrimination cases they are able to take on because of the time and financial burden that comes with discrimination cases. Because of this, most housing discrimination cases are referred out to private attorneys.

Lowell Landlords Association

The Lowell Landlords Association is a member organization for local landlords providing guidance and both legal and functional education on all aspects of landlord/tenant relations. These services include on proper screening techniques, rent collecting, evictions, and understanding the law and housing court. While the Lowell Landlords Association does not specifically offer fair housing training, they do regularly invite speakers to their monthly meetings who can offer guidance and training on fair housing issues. The Association meets on the second Tuesday of each month.

Northeast Association of Realtors

The Northeast Association of Realtors represents 15 cities and towns, from Boxford to Littleton, and is comprised of more than 1,200 realtors and 200 affiliate members. The

organization's mission is to enhance and promote the Realtor public image through community involvement; support diversity and equal housing opportunity; and act as a legislative force in the preservation of the public's right to own, transfer and enjoy the use of real property. Fair housing education is integrated into several of the services offered to the Association's member realtors. An annual seminar on fair housing is conducted in collaboration with the Fair Housing Center of Greater Boston each year. There is also a fair housing component to the continuing education courses offered by the Association, where members are provided with insight on fair housing law.

ONE Lowell Corporation: City Shapers Program

ONE Lowell has recently launched a new educational initiative designed to promote civic engagement among diverse program participants by introducing emerging leaders to new skills and to traditional sources of power within the City. Program participants will be prepared to: run for elected office, govern once elected, run a campaign, grassroots organize, be appointed to a city board or commission, be a community spokesperson, or apply for key jobs within city institutions. These courses will serve to build a strong and supportive cohort of new leaders who will support each others' endeavors for years to come while also building a culture that supports diversity in the city, specifically through leadership development. Opening up new pathways to leadership for recent immigrants and minority populations in the city will help to ensure that the needs (housing and otherwise) of these diverse populations are met.

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6.0 CONCLUSIONS AND RECOMENDATIONS

The role of economics, historical housing patterns, and personal choice are important to consider when examining fair housing choice. The decision of where to live depends largely on income. The economics of the marketplace control the availability of housing to households with limited income and may lead to the concentration of minority groups in certain neighborhoods with apartments that are more affordable than in other neighborhoods. Historically, zoning and development patterns also played a significant role in housing choice. Block groups in downtown Lowell are primarily made up of larger multi-family housing stock, whereas the outer neighborhoods tend to have fewer multi-family rental properties and many more single-family residences. Personal choice is an important consideration in the examination of fair housing issues. Every household regardless of race, disability, or other characteristic is free to choose where to reside. Ethnic groups may prefer to live in neighborhoods where they may have family and purchase goods from ethnic markets.

While economics, historical housing patterns, and personal choice are important considerations, the purpose of the fair housing laws extend beyond these basic issues to consider discrimination reflected within the housing delivery system. The impediments identified in this report are based on the principle that each household has the opportunity to make a personal housing choice that is within their economic means.

The City of Lowell has made progress on most of the impediments cited in the 2006 AI. Policy and recommendations have been included to guide future development of the city in a manner that will improve the quality of life for all of the residents of Lowell. The Master Plan analyzes the issue of clusters of poverty housing in the downtown census tracts that have been a result of years of historical housing patterns and obsolete zoning policy that has not kept up with unique needs of urban downtown areas.

The following Chapter will identify and discuss impediments identified for 2011. The impediments will include any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice. It will also recommend actions to reduce or prevent identified impediments. Additionally, this section will summarize impediments identified in the 2006 Analysis of Impediments to Fair Housing Choice and evaluate progress made with these impediments. The actions discussed are based in part on recommendations from the community through public hearings, the 2011 AI survey and organizational focus meetings conducted by the Lowell Department of Planning and Development.

6.1 EVALUATION OF IMPEDIMENTS AND RECOMMENDATIONS IDENTIFIED IN 2006

The following section recalls those Impediments and Recommendations identified in the 2006 AI. Text from the 2006 AI is gray/italics. Evaluations of the actions taken to address these impediments and recommendations are also included.

Impediment #1: Lack of a Fair Housing Agency
The lack of a stable and well-established fair housing entity creates an impediment to fair housing in the City. The 2001 AI identified the need for a fair housing agency and suggested that a local fair housing program be established to educate consumers and housing suppliers about fair housing rights, and to monitor and enforce fair housing

laws. The study also advised consultation with the MCAD for information about starting a program, and recommended the appropriation of sufficient funds to support such a program. Ideally, Fair Housing programs should be maintained through existing neighborhood and cultural organizations that understand the needs and speak the languages of their constituents. Providing more Fair Housing education and outreach through community-wide educational events will help residents develop an increased understanding of their rights under the law and the many forms of discrimination. The establishment of a local fair housing program will make it easier for residents to file a complaint if they believe that they have been victims of discrimination.

Community Teamwork, Inc. manages fair housing issues through its Consumer Education Program. While it employs a number of individuals to address local housing issues, the responsibility of developing a fair housing program currently rests on one individual. It is strongly recommended that current funds available for this position be leveraged to seek additional fair housing initiative funds so that a more solid Fair Housing Program with sufficient staffing and other resources can be established. In addition, it is not clear whether this program can proceed without the current financial support of the CDBG funds provided through the City of Lowell.

Evaluation of Actions Taken to Address this Impediment:

Despite two years of attempts at implementation, administration of a fair housing program through CTI did not prove successful. During the preparation of the City's Annual Action Plan for the 2006-07 fiscal year, the Citizens Advisory Committee did not recommend funding the Fair Housing Coordinator position with CDBG funds for another year.

Still needing to institute a system for disseminating fair housing information and centralizing access to resources and information regarding fair housing for the general public, the City sought the assistance of the Fair Housing Center of Greater Boston. During the 2006-07 program year, the City awarded the FHCGB CDBG funds to conduct outreach and educational activities on the issue of housing discrimination. Trainings targeting local non-profit housing providers, members of the Greater Lowell Landlords Association, employees at the Lowell Housing Authority, and members of the Northeast Association of Realtors, as well as an extensive media campaign took place.

Technical assistance and trainings provided through the FHCGB continued during the 2007-08 program year with more emphasis on building relationships with nonprofit providers and developing outreach materials and handouts. The FHCGB also teamed up with the Merrimack Valley Housing Partnership, a local agency that provides first time homebuyer training and counseling, to create an additional element to their curriculum focusing on fair housing rights and responsibilities. 500 families received this training in the past year. In addition FHCGB worked with MVHP staff to implement a screening process to determine if someone has experienced discrimination during their housing/mortgage search.

The combination of outreach and training to non-profit service providers will help serve to channel inquiries or complaints of housing discrimination to the FHCGB. The Fair Housing Center will follow up on complaints and enforcement, and is equipped to take legal action if necessary.

During the 2008-09 fiscal year, the FHCGB held a training for the Lowell Planning Board members. This training focused on how local planning policies and decisions can impact the availability and accessibility of housing.

Although the Fair Housing Center of Greater Boston has made substantial progress in disseminating outreach materials and providing fair housing trainings in Lowell, the establishment of a locally based fair housing agency capable of catering to the specific needs of Lowell residents remains a priority. To address this community-wide need, the FHCGB applied for HUD funding to establish a satellite office in Lowell. In support of this initiative, The Department of Planning and Development pledged to commit Community Development Block Grant funding to support start up costs during the office’s first three years in operation. Additionally, DPD worked with the FHCGB to locate an appropriate space and garner additional support for the satellite office amongst local area nonprofits and other housing providers. Unfortunately, the FHCGB was unsuccessful in securing the appropriate funding for this initiative but plans to re-apply for funding some time in the near future.

Public input and survey data from the outreach phase of the 2011 Analysis of Impediments indicated that this impediment needed to be reevaluated and reformulated. As a result, the impediment has been separated into two distinct impediments in the updated document in order to more appropriately address the underlying issues at hand. Further discussion is included in the next section of this chapter.

Impediment #2: Lack of Racial Diversity on City Boards and Commissions
Currently there is minimal minority representation on City land use boards. There is a lack of diversity reflecting the racial and ethnic composition of the City on the zoning and planning boards.

Evaluation of Actions Taken to Address this Impediment:

Some progress has been made on diversifying the appointments to City Boards and Commissions since the 2006 AI. The City Manager has made it a priority to attempt to reach a larger segment of the community to increase the applicant pool through the use of the city website, list serves, email blasts and other social media, in addition to the more traditional use of the newspaper. Below is a table outlining the progress made on this Impediment since 2003.

Table 6-1: Membership on Lowell City Boards and Commissions				
	2003	2006	2011	% Change Since 2006
Number of City Boards and Commissions	25	28		
Total Membership	134	149	135	-9%
Female	36	43	64	49%
Black	n/a	n/a	8	n/a
Asian	7	10	14	40%
Hispanic	4	12	4	-67%

Source: City of Lowell Clerks Office & Office of the City Manager

As of 2006, there were 28 municipal Boards and Commissions in Lowell with a total of 149 members. Significant progress has been made with the appointment of females to the City's Boards and Commissions. The percentage of female appointees to municipal boards rose to 47% of the total membership in 2011. While the percentage of Asian members increased in this same time period, the 10% representation of this race on the City's Boards and Commissions is still less than the percentage of this population group in the City. The percentage on these boards and commissions has declined since the release of the last AI.

Most recently, in order to address the lack of diversity of City Boards and Commissions, The Immigration Assistance Commission was established for the purpose of advocating for the well-being of Lowell's diverse immigrant and refugee population and the development of policies and programs that assist resident immigrants of the City of Lowell in addressing their needs and concerns. The Immigration Assistance Commission consists of nine members appointed by the City Manager subject to confirmation by the City Council and four additional ex officio members. The nine appointed members are comprised of persons representing the following offices, disciplines and interests: two persons from the business community; two from organizations that serve diverse populations and whose representatives have experience working with immigrants and refugees; five from diverse immigrant groups. This commission is designed to provide Lowell's diverse populations with better representation at the municipal level and is currently exploring new ways to increase civic involvement amongst minority populations in Lowell.

Also worthy of note is the development of a new program designed to increase minority civic engagement by one of Lowell's non-profit service providers. ONE Lowell has recently launched a new educational initiative designed to promote civic involvement among diverse program participants by introducing emerging leaders to new skills and to traditional sources of power within the City. Program participants will be prepared to: run for elected office, govern once elected, run a campaign, grassroots organize, be appointed to a city board or commission, be a community spokesperson, or apply for key jobs within city institutions. These courses will serve to build a strong and supportive cohort of new leaders who will support each others' endeavors for years to come while also building a culture that supports diversity in the city, specifically through leadership development. Opening up new pathways to leadership for recent immigrants and minority populations in the city will help to ensure that the needs (housing and otherwise) of these diverse populations are met.

While mixed progress on this impediment has been made since 2006, increasing minority representation on City Boards and Commissions remains a priority for the City and is included in the 2011 AI as Recommendation # 2.

Impediment #3: Discrimination in Rental Real Estate Practices Due to Presence of Lead Paint

The abundance of older homes with lead paint in the City, in conjunction with Massachusetts' Lead Paint Law, limits the number of available homes for families with young children. Many landlords are reluctant to rent to families with young children, particularly because of lead paint laws and the high cost of compliance. 79% of Lowell's housing stock (almost 31,000 units) was built before 1950 and Lowell has one of the

highest rates of lead poisoning in the state. While the City has made good progress in de-leading some of the City's older housing stock through its Lead Abatement program, the recent loss of HUD Lead Hazard Control Grant Funding threatens the continued success of the program.

Evaluation of Actions Taken to Address this Impediment:

Lowell's Lead Abatement Program was awarded a \$3 million Lead Hazard Control Grant by the U.S. Department of Housing and Urban Development (HUD) beginning April 2009 through April 2012.

The Lead Abatement program spent \$25,395.24 in CDBG funds during the 2009-10 program year to operate a broader lead-based paint hazard abatement program. Seven housing units were de-leded during the reporting period.

In order to keep the assisted units affordable for people who are low-income, Lowell requires a deed restriction for all rental units receiving assistance from the Consolidated Plan programs for the LHCG program. This restriction limits the use of the property to low- and moderate-income people for rental units. The minimum duration of the restriction is three (3) years, with longer terms dictated by the funding source(s) applied to the project.

While the City has made substantial progress in de-leading many of the units containing lead paint here in Lowell, much work remains to be done. Due to the large number of housing units built before 1978 and the Massachusetts Department of Public Health's ranking of Lowell as a "High Risk" community for Childhood Lead Poisoning, the potential for discrimination against children with families due to the presence of lead paint remains as Impediment #3 in the 2011 AI.

*Recommendation #1: Increase On-going Predatory Lending Awareness Efforts
In communities such as Lowell, the number of "sub prime" loans has increased well above the state average. Sub prime loans are high interest-rate mortgages offered to consumers with credit problems or limited incomes that may benefit the borrower by expanding credit. Predatory loans have higher interest rates, excessive closing costs, prepayment penalties, fees, or balloon payment requirements and may include deception, fraud, or manipulation. The elderly, minority, and low-income homeowners who have financial troubles, are not fluent in English, or are otherwise intimidated by the process of securing a conventional mortgage, are often targeted by predatory loan agencies. Existing homeowners who refinance using sub prime loans are also targeted. Unfavorable terms and higher interest rates can ultimately result in the loss of equity in a home or a foreclosure on a home.*

Evaluation of Actions taken to Address this Recommendation

The City of Lowell, in conjunction with the Merrimack Valley Housing Partnership (MVHP) provides downpayment assistance and pre-purchase counseling to homebuyers through its First Time Homebuyer Program. MVHP spends a great deal of time on preemptive education and ways to identify predatory lending practices in its pre-purchase counseling sessions. While no formalized post-purchase counseling is provided through MVHP, staff frequently meets with new homeowners who have questions or concerns about their loan options.

Despite the success of the “Don’t Borrow Trouble Campaign” in Lowell in 2003, it has been difficult to sustain. Homebuyers working with MVHP and the City’s First Time Homebuyer Program are directed to free, anonymous refinancing and foreclosure prevention assistance provided through the Campaign’s sponsoring agency, the Massachusetts Division of Banks. In an effort to address the recent high rate of foreclosures in the Greater Lowell area, a taskforce has been formed with members from MVHP, the City’s housing office, local lending institutions, and non-profit agencies. Emphasis is being placed on assisting minorities and non-English speaking homeowners who may be targeted by predatory lending agencies. Brochures detailing available foreclosure prevention services have been mailed to several thousand homeowners in Lowell. With the exception of one case of short sale, none of the more than 500 households completing the MVHP/City of Lowell First Time Homebuyer Program have been foreclosed upon.

The MVHP is collaborating with the Cambodian Mutual Assistance Association to provide pre-purchase counseling and homebuyer training to Lowell’s Khmer speaking community. These efforts, in addition to the classes provided in Spanish and Portuguese help spread predatory lending awareness to the largest minority communities in the City.

Also new in FY 09-10, two local non-profit organizations (Community Teamwork, Inc. and the Coalition for a Better Acre) teamed up to form the Home Preservation Center, a program that provides post-purchase counseling, credit counseling, and foreclosure prevention services to minority and low-income households.

Lastly, focus meetings with local nonprofits and other housing providers have indicated that a distinct shift in the housing market of late has made it increasingly difficult for even well-qualifying candidates to secure a home loan. This constriction of housing loans overall has resulted in a drastic reduction of the number of predatory loans. Additionally, the influx of foreclosures nationwide has brought attention to the negative impacts of these predatory loans, which has heightened awareness and prompted homebuyers to be more cautious in their borrowing.

This recommendation has been removed from the 2011 AI in light of the drastic decrease in predatory lending practices since 2006.

Recommendation #2: Concentration of Subsidized Housing in Central Lowell
While the City has made substantial efforts in deconcentrating subsidized housing downtown, continued efforts to develop low-income housing in block groups with lower-minority concentrations is recommended. Minorities live in all neighborhoods in the City but are primarily concentrated in the lower per capita income block groups. According to the 2000 Census, minority concentrations in all areas of Lowell increased from 1990-2000, with the greatest increases occurring in the Centralville, Lower Highlands, and Highlands neighborhoods.

Evaluation of Actions Taken to Address this Recommendation

While many surrounding communities have increased their percentage of affordable housing in the last four years, Lowell still maintains 53% of the region’s subsidized

affordable housing. Tewksbury, which has the second highest percentage of affordable housing at 9.6%, offers only 1/5 the number of affordable units compared to Lowell.

Within the City of Lowell there are several projects in various stages of development, which will provide affordable housing to low- and moderate-income households in Lowell's neighborhoods. These projects include the construction of 22 rental units at the D'Youville Senior Care Center in Lowell's Pawtucketville neighborhood. These units were completed in January 2007 and are restricted to elderly households. An additional 42 affordable units were completed during the 08-09 program year. The reinvention of the former Julian D. Steele site is underway and expected to provide 180 units of both owner occupied and rental units in Lowell's southern census tracts. A project in South Lowell, Alternative House, Inc., completed during the 08-09 fiscal year includes six townhouses with 2 and 3 bedrooms for low-income households. Three units on Lakeview Ave in Lowell's Centralville neighborhood were completed during the 2006-07 reporting period. Finally, a number of 2-3 family developments are underway in Lowell's Highlands and Centralville neighborhoods that will provide additional affordable housing to low/moderate-income households.

The City works to concentrate its HOME and Neighborhood Stabilization Program funds in designated "Opportunity Areas" where there is less concentration of minority and low-income households outside of the City center. In addition to supporting the redevelopment of new affordable units in these areas, the City is working with the Lowell Housing Authority to local Project Based Vouchers in Opportunity Areas to further support housing options for Lowell households and deconcentrate subsidized housing.

These projects, coupled with the additional development of market rate housing in downtown Lowell, help to deconcentrate low-income housing in the City's center and ensure the availability of a range of housing options throughout Lowell.

The City remains committed to providing a range of housing options in order to accommodate diverse populations throughout Lowell. Public input and shifting demographics have resulted in the re-formulation of this recommendation for the 2011 AI to better address the underlying fair housing challenges related to this issue. Please refer to Recommendation #1 in section 6.3 for further explanation.

*Recommendation #3: Lack of policy regarding accessibility/ visitability
HUD provides the following guidelines and recommendations in its Fair Housing Guide, pg 5-31:*

"HUD endorses the "visitability" concept, which is a voluntary standard promoted by the Department in new construction and existing properties. Visitability means that:

- at least one entrance is at grade (no step), approached by an accessible route, such as a sidewalk and*
- the entrance door and all interior doors on the first floor are at least 34 inches wide, offering 32 inches of clear passage space.*

Visitability allows mobility-impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also serves persons without disabilities (for example, a mother pushing a stroller, a person delivering large

appliances, a person using a walker, etc.). One difference between “visitability” and “accessibility” is that accessibility requires that all features of a dwelling unit be made accessible for mobility-impaired persons. A visitable home provides less accessibility than an accessible home, and is meant to be those units not required to be accessible.”

The DPD lacks guidelines regarding visitability/accessibility that go beyond what is required by the basic “handicapped accessibility” laws for CDBG and HOME funded residential development of more than four units. This guideline would affect new construction of private residential developments and rehabs of 4 or fewer units.

Evaluation of Actions Taken to Address this Recommendation:

In order to promote and encourage a more fully inclusive community, the City of Lowell recognizes the importance of encouraging the incorporation of accessibility and visitability in new housing construction and existing residential homes in the City. HUD endorses the voluntary concept of visitability and encourages Jurisdictions to incorporate the concept beyond what is currently required by the law in order to affirmatively further fair housing. Taking this into consideration, the City of Lowell raised the issue with local housing stakeholders and non-profits providing services for disabled populations here in the City during the public input phase of this document. In response, it was conveyed to the City that the lack of a formal policy regarding accessibility and visitability is not an issue affecting fair housing choice here in Lowell. On the contrary, these stakeholders relayed that their clients have had little to no trouble finding quality affordable housing that suits their needs. In fact, organizations that work with residents with physical handicaps noted cooperation they receive from landlords when making requests on behalf of their clients for reasonable accommodations. This is largely due to the range of effective services offered by the network of dedicated non-profits in Lowell providing housing search and placement services for those in need. With this information—in combination with a lack of control over state building codes— The City has decided to remove this Recommendation to formulate a specific policy regarding these concepts from the 2011 Analysis of Impediments.

Despite the finding that the lack of a formal policy in this area is not affecting fair housing choice here in Lowell, the City still recognizes the need to encourage building and rehabilitation practices that incorporate these two important concepts in order to make Lowell a more fully inclusive community. Moving forward, the City will take proactive steps whenever possible to encourage the incorporation of accessibility and visitability in the construction and rehab of all new housing structures. In the immediate future, the City will include a clause in its Requests for Proposals for federal funding encouraging all developers to incorporate these concepts in their building designs. Additionally, these concepts will be considered by the City’s Design Review team when reviewing proposals for new housing construction.

Recommendation #4: Shortage of 3 and 4 Bedroom Affordable Rental Units for Families with Children

A limited number of housing units with three and four bedrooms are available to families. This issue may be due, in part, to the number of University of Massachusetts, Lowell students renting large units, as identified in both the 1997 and 2001 AI. In an effort to encourage construction of off-campus higher-density student housing in locations near the University campus, the City created the Institutional zoning district

(INST). The new mixed-use district is designed to capitalize on the development potential of the major institutional campuses in the City, while serving to contain the impact of these campuses in designated areas. While affordable housing developers are building housing units with more bedrooms, a lack of policies or incentives to encourage the construction of larger homes continues to affect the limited number of units available for families.

Evaluation of Actions Taken to Address this Recommendation

The City of Lowell has taken several proactive steps to increase the availability of multi-bedroom affordable housing for families with children, especially in the areas surrounding the two UMass Lowell Campuses. Two housing projects were completed in the 2005-06 program year that provide 3 and 4 bedroom units to families at affordable rents. House of Hope, Inc. created 11 units of new affordable rental housing and The East Boott Cotton Mills Limited created an additional 10 affordable rental units. Of the total 21 units created by these projects, 8 are 3-bedroom units and 2 are 4-bedroom units. These units became fully occupied in fiscal year 2005-06 and are rented to families earning 0-30% of the area's median income.

During the 2006-07 program year, three units at 205 Worthen St. and three units at 172 Lakeview Ave were completed. All units are 3-bedroom and are occupied by low/moderate-income households. During the 2008-09 fiscal year, one 3-bedroom unit was completed at Bernier St and two 3-bedroom units were completed at 344 Pawtucket St.

During the 2009-2010 program year, 2 3-bedroom units were completed on Sagamore St. in the Highlands neighborhood. Developments with 3+ bedroom units were also completed at the Rivers Edge Development and the St. Joseph's High School on Merrimack Street. All three of these programs were assisted with HOME funds. The City has also awarded Neighborhood Stabilization Program (NSP) funds to developments at Unity Place on Moody Street and the Firehouse Development on Fourth Street. Both of these projects will include units with 3+ bedrooms are expected to be completed within the next 1-2 years.

The University of Massachusetts has also taken several proactive steps to increase the amount of on-campus housing options for its students. According to Mr. Larry Siegel, UMass Lowell Dean of Students, the University has increased its' on campus bed capacity by over 1100 beds since the arrival of Chancellor Meehan. The largest single increase came via the purchase of the Inn and Conference Center, formally the Doubletree Hotel. The ICC currently houses approximately 500 students. In addition, plans are currently underway to construct a new residence hall on the East Campus for 500 students as well as convert sections of the newly acquired University Crossings, formally St. Joseph's Hospital, for as many as 400 additional beds. Discussions are underway to also consider additional housing options closer to the South Campus"

The variety of University housing opportunities will allow the University to meet the needs of previously underserved populations such as graduate, married students, and veterans as well as other cohorts that often present a unique set of circumstances and needs that are different from those of our traditional undergraduate population. It is also believed, that by addressing the current demand for student housing, the University will be able to support it's partnership with the city to alleviate some of the burden for

rental housing that will now become available to young professionals and families wishing to make Lowell their home.

Due to the extensive efforts undertaken by both the City of Lowell and the University of Massachusetts Lowell to increase the availability of 3-4 bedroom units for families with children, this recommendation has been removed from the 2011 AI.

6.2 2011 IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediment 1: Lack of Fair Housing Outreach and Education:

The City of Lowell currently lacks fair housing outreach and education on the community-wide level. Input received during the City's outreach efforts in the development of this document indicates that local housing and social service providers are knowledgeable about fair housing rules and assist clients in a wide range of housing matters, including discrimination (see Section 5.2). While this education and advocacy is valuable, these efforts typically only reach a small population and are not providing outreach community-wide. Many organizations stressed the need for a coordinated effort to provide training and outreach targeting all Lowell residents. The availability of these services will help residents develop an increased understanding of their rights under the law. Such coordinated training and outreach would also be valuable to organizations and entities that have an impact on housing access and availability including non-profit service providers, land use boards and commissions, and landlord/ real-estate organizations.

Actions to be Taken to Address this Impediment

Opportunities to educate the public on fair housing should be supported by the City of Lowell and its partner agencies to demonstrate that Lowell "affirmatively furthers fair housing." Renters and homeowners need access to information regarding their fair housing rights under the law. Furthermore, real estate agents, landlords and property owners will benefit from education and trainings on their fair housing responsibilities. The City and its partner agencies will continue to support new fair housing outreach and training initiatives, especially those on the community-wide level. Additionally, as part of its commitment to addressing fair housing issues, the City and its partner agencies will continue to work with and support local area service providers in their efforts to distribute fair housing information and guidance to residents of the City of Lowell.

Impediment 2: Lack of Fair Housing Enforcement:

The City of Lowell currently lacks a direct and accessible process for reporting potential acts of housing discrimination. Filing a discrimination case is a lengthy process requiring extensive resources and knowledge of the legal system. While there are many organizations in Lowell that are able to provide guidance to their specific client base, these organizations are limited in the amount of time and resources they are able to dedicate to potential cases of housing discrimination. In most cases, clients are referred out to MCAD or a private attorney. The availability of these fair housing services will make it easier for residents to file a complaint if they believe they have been victims of discrimination.

Actions to be Taken to Address this Impediment

In combination with outreach and education efforts undertaken to address Impediment 1, the City and its partner agencies should also work to encourage and educate local residents on the different avenues for reporting acts of housing discrimination. In

addition, the City and its partner agencies will work with local housing service providers to make the process for reporting fair housing violations more accessible and direct.

Impediment 3: Potential for Discrimination against Children with Families Due to the Presence of Lead Paint:

The City of Lowell’s Lead Abatement Program has made substantial progress in providing outreach and education regarding lead paint poisoning and Massachusetts lead paint laws to both property owners and renters. Since 2000, as a recipient of HUD’s Lead Abatement grant, the City has assisted 787 units in removing lead-based paint with direct financial assistance. Despite these efforts however, The Massachusetts Department of Health and Human Services continues to classify Lowell as a “high-risk” community for cases of lead poisoning. This designation, coupled with a sizable inventory of housing units built before 1978 (according to 2009 ACS data- over 80% of the city’s housing stock), indicate the need to continue outreach and abatement in order to avoid the potential for discrimination against families with young children.

Actions to be Taken to Address this Impediment

The City’s Lead Abatement Department will continue to address this problem by assisting landlords with the high cost of lead abatement and aggressively accessing additional Federal and State resources. Furthermore, the City will continue to address the financial burden associated with lead abatement by providing grants, deferred loans and low-interest loans to investors who create multi-family housing of 4 or fewer units, subject to the availability of funding.

6.3 ADDITIONAL RECOMMENDATIONS

Recommendation 1: Continue to encourage the development of a variety of housing options for individuals of mixed incomes—especially in areas of high concentrations of minority and low-income populations:

The City of Lowell has historically been home to significant populations of low income, immigrant and minority populations. This historical trend continues at present and has presented challenges for the City when attempting to circumvent the adverse effects associated with “pockets of poverty.” The City has made significant progress in recent years to de-concentrate poverty in its downtown neighborhood with the development of market rate units in former industrial mill buildings. More than 1,600 units were added to the City’s housing stock since 2000 to Lowell’s downtown, without losing a single affordable unit. To continue to deconcentrate these areas of low-income and minority populations, the City should continue to encourage the development of a variety of housing options for individuals of mixed incomes. Diversifying housing options in areas with low-income and minority concentrations will work to reduce these concentrations without displacing any affordable housing throughout the city.

Actions To Be Taken To Address This Recommendation:

The City will continue to encourage and support a range of housing options throughout all sections of Lowell. When possible, housing developments in the City’s “Areas of Opportunity” will be given preference for federal funding. The City will continue to work to concentrate its HOME and Neighborhood Stabilization Program funds in designated “Opportunity Areas” where there is less concentration of minority and low-income households outside of the City center. In addition to supporting the redevelopment of new affordable units in these areas, the City will also continue to work with the Lowell

Housing Authority to locate local Project Based Vouchers in Opportunity Areas to further support housing options for Lowell households and deconcentrate subsidized housing.

These projects, coupled with the additional development of market rate housing in downtown Lowell, help to deconcentrate low-income housing in the City's center and ensure the availability of a range of housing options throughout Lowell.

Recommendation 2: Promote Diversity on City Boards and Commissions:

Since the release of the 2006 AI, progress has been made to diversify many of the City's boards and commissions. In response to the growing number of new immigrants in the City and in recognition of the need to advocate for these families the City initiated the Immigration Commission. The City also appoints members to its Disability Commission whose job is to advise the City Manager on issues related to Lowell's handicapped population. With the exception of these two boards, however, members on the more than 20 Boards and Commission in the City are still not representative of Lowell's diverse population. This lack of representation, especially on some of the City's land use boards, has the potential to impact the availability and accessibility of housing for households falling within a protected class. The City should continue to take the appropriate steps to work towards providing these diverse demographics with proper representation on City Boards and Commissions.

Actions To Be Taken To Address This Recommendation:

The City will continue to work proactively and aggressively to increase the applicant pool for openings on City Boards and Commissions through the use of the city website, list serves, email blasts and other social media, in addition to the more traditional use of the newspaper. Alternative methods for increasing civic engagement by the City's minorities will also continue to be explored and supported.

Recommendation 3: Formalize a Limited English Proficiency (LEP) Plan:

In August 2000, Executive Order 13166 titled "Improving Access to Services by Persons with Limited English Proficiency" was issued. The Order requires federal agencies and recipients of federal funds to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. While the City has several mechanisms in place to ensure that the diverse populations of Lowell are granted equal access to information and services provided by the City, these policies and procedures are not formalized in an LEP Plan. The development of such a plan will provide the City with an opportunity to assess its current practices and identify steps it can take to ensure equal access to its programs is available to all residents.

Actions To Be Taken To Address This Recommendation:

The City will work to formalize a Limited English Proficiency (LEP) Plan in order to better serve the needs of Lowell's diverse populations.

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7.0 APPENDICES

7.1 PUBLIC HEARING: DECEMBER 9, 2010

On December 9, 2010 the City of Lowell's Department of Planning and Development hosted a Public Hearing to solicit public input regarding the update to the Analysis of Impediments to Fair Housing Choice. Representatives from the Fair Housing Center of Greater Boston, the Lowell Housing Authority, and The City of Lawrence's Department of Community Development along with members of the general public were in attendance.

7.1.1 PUBLIC HEARING MEETING NOTES

Tracy L. Brown, Executive Director of the Fair Housing Center of Greater Boston (FHCGB) attended this Public Hearing and offered several valuable points in regards to the update of Lowell's Analysis of Impediments to Fair Housing Choice. During the meeting Ms. Brown touched upon some of the valuable fair housing services offered by the FHCGB. They include technical assistance with the development of the AI, housing discrimination testing, fair housing outreach, education and trainings, and fair housing legal services.

Ms. Brown also offered some valuable advice regarding the difference between fair housing and housing choice: she noted that the concentration of minorities in a specific area of a community is not necessarily an indicator of housing discrimination—it could be the case that minorities are *choosing* to live in certain areas by their own volition. However, if concentration is occurring by force (i.e., steering) or as a result of some government policy, then it becomes a fair housing issue that must be addressed. One of the goals of this document should be to ensure that these areas of concentration are not occurring as a result of force or government policy.

In regards to the update to this document, she stressed the need for the City of Lowell to consider Equity and Equal Opportunity for its residents when making choices regarding access to housing. She also noted the importance of thinking about housing choice in a greater context as it relates to transportation, employment opportunities and access to other basic needs. The following specific considerations were also raised by Ms. Brown:

- Public transportation in the City should not only be made available in areas with concentrations of low-moderate income and minority residents, but also in "areas of opportunity" to increase accessibility to these areas and encourage the deconcentration of low/mod and minority populations.
- The City should work in collaboration with local health service providers to consider how access to health care might effect housing choice options in the City.
- The FHCGB has found that predatory lending and foreclosures have adversely effected minorities and low income individuals.

Lastly, Ms. Brown noted that the FHCGB is interested in establishing a satellite location here in the City of Lowell. While the regional services offered by this organization already provide Lowell residents with many valuable resources, locating an office here in the City would increase access to these services and allow the FHCGB to directly address

the specific fair housing issues faced by individuals living in Lowell. The City strongly supports the establishment of a FHCGB satellite location here in Lowell.

In addition to Ms. Brown's comments, the following comments were also made during the Public Hearing:

- Marlene Browne, Lowell Housing Authority: while the LHA works to affirmatively further fair housing here in Lowell, the nature of the organization's line of work means that fair housing issues inevitably come up from time to time. As a result, the Housing Authority regularly collaborates with the FHCGB and provides trainings for staff. Additionally, the LHA is working on establishing training for landlords sometime in the near future.
- The Community Development Department in Lawrence is also working on an update to their Analysis of Impediments and had a representative attend the Public Hearing to learn about Lowell's AI process.

7.1.2 PUBLIC HEARING ATTENDEES



The City of Lowell • Department of Planning and Development
JFK Civic Center • 50 Arcand Drive • Lowell, MA 01852
P: 978.446.7200 • F: 978.970.4262
www.LowellMA.gov

Adam Baacke
Assistant City Manager/Director

Anne Barton
Deputy Director

2010 Analysis of Impediments to Fair Housing Choice Public Hearing: December 9, 2010

Sign In

Name/ Organization

Mark E. Goldman	58 Oakland St. Lowell, Ma. 01851
Marlene Browne	Lowell Housing Authority
Erice Deice	Lawrence Community Development Department (intern)
Tracy L. Braun	Fair Housing Center of Greater Boston

The City of **LOWELL** *Alive. Unique. Inspiring.*

7.2 INDEPENDENT COMMENT SUBMITTALS

From: Tracy Brown [mailto:tbrown@bostonfairhousing.org]

Sent: Wednesday, July 13, 2011 4:56 PM

To: Currier, Emily

Subject: Re: FW: Notice of Availability: Draft Analysis of Impediments to Fair Housing Choice

Hi Emily:

One area we can comment on now is your #3 Recommendation - Lack of policy regarding accessibility/visitability. You note the following recommendation:

"...The City recognizes that the advantages of incorporating the concept of visitability into building codes and construction policy, however, with no control over building codes, the City is unable to make significant advancements in addressing this recommendation. Therefore, this recommendation has been removed from the 2011 A.I. Moving forward the City will encourage incorporating the concept of visitability into new housing developments in Lowell whenever possible..."

We believe that you should not "remove" it from the 2011 A.I., but work the MA Municipal Association (coalition of all the mayors) to get the necessary changes to the building codes. And, you should specifically petition the MA State Department of Public Safety to amend the state building code. You can organize a group of stakeholders, e.g., local non-profits, to join with you to promote the changes of the building codes.

I will have additional recommendations next week. I understand if it is passed the official comment period.

Regards,

--

Tracy L. Brown
Executive Director
Fair Housing Center of Greater Boston
59 Temple Place #1105
Boston, MA 02110
(617) 399-0491 x 102
(617) 399-0492 (fax)

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City of Lowell Response:

In order to promote and encourage a more fully inclusive community, the City of Lowell recognizes the importance of encouraging the incorporation of accessibility and visitability in new housing construction and existing residential homes in the City beyond the scope of what is currently required under the law. As noted in the 2006 AI:

“Visitability allows mobility-impaired residents to visit families and friends where this would not otherwise be possible. A visitable home also serves persons without disabilities (for example, a mother pushing a stroller, a person delivering large appliances, a person using a walker, etc.). One difference between “visitability” and “accessibility” is that accessibility requires that all features of a dwelling unit be made accessible for mobility-impaired persons. A visitable home provides less accessibility than an accessible home, and is meant to be those units not required to be accessible.”

HUD endorses the voluntary concept of visitability and encourages Jurisdictions to incorporate the concept beyond what is currently required by the law in order to affirmatively further fair housing. Taking this into consideration, the City of Lowell raised the issue with local housing stakeholders and non-profits providing services for disabled populations here in the City during the public input phase of this document. In response, it was conveyed to the City that the lack of a formal policy regarding accessibility and visitability is not an issue affecting fair housing choice here in Lowell. On the contrary, these stakeholders relayed that their clients have had little to no trouble finding quality affordable housing that suits their needs. In fact, organizations that work with residents with physical handicaps noted cooperation they receive from landlords when making requests on behalf of their clients for reasonable accommodations. This is largely due to the range of effective services offered by the network of dedicated non-profits in Lowell providing housing search and placement services for those in need. With this information, The City decided to remove the Recommendation to formulate a specific policy regarding these concepts from the 2011 Analysis of Impediments.

Despite the finding that the lack of a formal policy in this area is not affecting fair housing choice here in Lowell, the City still recognizes the need to encourage building and rehabilitation practices that incorporate these two important concepts in order to make Lowell a more fully inclusive community. Moving forward, the City will take proactive steps whenever possible to encourage the incorporation of accessibility and visitability in the construction and rehab of all new housing structures. In the immediate future, the City will include a clause in its Requests for Proposals for federal funding encouraging all developers to incorporate these concepts in their building designs. Additionally, these concepts will be considered by the City’s Design Review team when reviewing proposals for new housing construction.

7.3 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE SURVEY

In order to gather data and public comment for the 2011 Analysis of Impediments to Fair Housing Choice, The Department of Planning and Development distributed a survey to local area residents and housing industry professionals. The survey was made available from November of 2010 through February of 2011. The survey was advertised and made available through the City’s website and was distributed to dozens of nonprofits in the region that represent the City’s low/moderate and minority populations.

Hard copies of the survey were made available for those without access to the internet. Additionally, free public internet access is available at the Pollard Memorial Library and the Lowell Senior Center. For non-English speakers, the survey was distributed to partner organizations that made staff available to translate and assist in filling out the survey. In total, the survey had 122 responses. Many of the respondents (approx 1/3) identify themselves as "in-need service providers"- reporting on behalf of their clients. Overall, the findings of this survey correlated closely with narrative accounts presented by local area housing advocates and providers in focus group meetings.

A copy of this survey has been included below.

2010 Impediments to Fair Housing Choice Survey

1. Analysis of Impediments to Fair Housing Choice

Purpose of this survey:

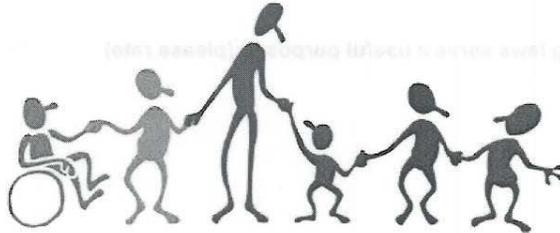
Thank you for taking the time to complete this survey. Your answers will be anonymous and the survey will take about fifteen minutes to complete.



The Lowell Department of Planning and Development is conducting this survey to identify impediments to Fair Housing and other discriminatory practices related to housing in Lowell, Massachusetts. Part of the "Analysis of Impediments to Fair Housing Choice," this study is required every five years by the U.S. Department of Housing and Urban Development to identify and overcome obstacles that infringe on fair housing needs.

The City is committed to taking the appropriate actions to overcome the effects of any impediments identified through this analysis, and will maintain records reflecting the analysis of such actions taken in this regard. Although the barriers to affordable housing are related to housing choice, this survey will focus on the impediments to fair housing, emphasizing the individual's ability to make a personal housing choice within their economic means without discrimination.

This survey has been distributed to all parties that play an active role in the housing community of the City of Lowell. This community includes non-profits, real estate agencies, developers & planners, property managers, fair housing advocates and both recent and potential home buyers or rental tenants. If there is any question that does not apply to you or your organization, please select the "N/A" option.



2. Analysis of Impediments to Fair Housing

What is "fair housing" law?

In an effort to end housing segregation, the U.S. Congress passed Title VIII of the Civil Rights Act of 1968, making acts of housing discrimination based on race, sex, national origin, religion or ethnicity illegal. Congress amended this landmark legislation in 1988 making acts of discrimination against families with children and people with mental or physical illness equally unlawful. Under Massachusetts law, it is also unlawful to discriminate against an individual because they are recipients of public assistance, including assistance in the form of housing certificates or vouchers as well as age, family status, marital status or sexual orientation.

2010 Impediments to Fair Housing Choice Survey

SIGNS OF DISCRIMINATION INCLUDE, BUT ARE NOT LIMITED TO:

Rent, fees, or deposit amounts quoted higher than what was originally advertised.

A prospective tenant told the unit is already rented, even though the unit is still advertised for rent.

A prospective tenant is met with statements like: "You probably won't like this area," "There are no family units left," or "There is no place for your child to run around."

A realtor "steers" you toward certain neighborhoods and avoids others, despite what you can afford or desire.

You are denied reasonable accommodations (such as railings or ramps to aid in mobility issues) to accommodate your disability.

3. Understanding Fair Housing law:

The following questions deal with your knowledge of fair housing law, as well as your opinion on its usefulness and application.

1. How familiar are you with fair housing laws?

- Very familiar
- Familiar
- Somewhat Familiar
- Not Familiar

2. In your opinion, do fair housing laws serve a useful purpose? (please rate)

- Very useful
- Useful
- Somewhat useful
- Not useful
- Don't know

3. Are fair housing laws difficult to work with, understand, or follow?

- Yes
- No
- Don't know

2010 Impediments to Fair Housing Choice Survey

4. To the best of your knowledge, is there a training process or credible resource in the City of Lowell to learn about fair housing laws?

- No
- Don't know
- Yes (please specify)

5. Is there sufficient outreach and education regarding affirmatively furthering fair housing in Lowell?

- Yes
- Could be better
- No

4. Fair housing in Lowell

The following questions ask for your opinions on the current housing climate in Lowell:

1. Can you think of any specific regulations- including building codes, administrative actions, occupancy standards, or health and safety codes that may represent barriers or adversely effect fair housing choice in Lowell?

- No
- Yes:

2. More generally, do you see any barriers to fair housing (not affordability issues) in Lowell?

- No
- Yes

2010 Impediments to Fair Housing Choice Survey

3. If you answered yes to the previous question, what was the basis for your answer?

(check all that apply)

- | | |
|--|---|
| <input type="checkbox"/> N/A- I do not see any barriers to fair housing in Lowell. | <input type="checkbox"/> Marital status |
| <input type="checkbox"/> Race | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Family status |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Age |
| <input type="checkbox"/> Ancestry | <input type="checkbox"/> Source of income |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Disability |

Other (please specify)

5. Fair housing by neighborhood

1. Do you see specific areas or neighborhoods that have a fair housing problem within the City? (Check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> Back Central | <input type="checkbox"/> Pawtucketville |
| <input type="checkbox"/> Belvidere | <input type="checkbox"/> Ayers City/ Sacred Heart |
| <input type="checkbox"/> Centralville | <input type="checkbox"/> South Lowell |
| <input type="checkbox"/> Downtown | <input type="checkbox"/> The Acre |
| <input type="checkbox"/> Highlands | <input type="checkbox"/> N/A- I don't believe there are any neighborhoods with fair housing issues in Lowell |
| <input type="checkbox"/> Lower Belvidere | <input type="checkbox"/> Don't Know |
| <input type="checkbox"/> Lower Highlands | |

Not sure of neighborhood, street name:

2010 Impediments to Fair Housing Choice Survey

2. To your knowledge, has any hate crime been committed in Lowell? If yes, on what basis?(select all that apply)

- | | |
|--|--|
| <input type="checkbox"/> To my knowledge, no hate crimes have been committed in my neighborhood. | <input type="checkbox"/> Marital status |
| <input type="checkbox"/> Race | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Family status |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Age |
| <input type="checkbox"/> Ancestry | <input type="checkbox"/> Source of income (including section 8 status) |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Disability |

6. Your personal experiences with housing discrimination

1. Have you or someone you know (i.e. family member, neighbor, client, etc.) personally experienced housing discrimination from any of the following?:

- I have not experienced any form of housing discrimination.
- Landlord/ property owner
- Mortgage lender
- Real estate agent
- Mortgage insurer

Other (please specify)

2. What was the basis for this housing discrimination?

- | | |
|---|--|
| <input type="checkbox"/> I have not experienced any form of housing discrimination. | <input type="checkbox"/> Marital status |
| <input type="checkbox"/> Race | <input type="checkbox"/> Sexual orientation |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Family status |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Age |
| <input type="checkbox"/> Ancestry | <input type="checkbox"/> Source of income (including section 8 status) |
| <input type="checkbox"/> Gender | <input type="checkbox"/> Disability |

Other (please specify)

2010 Impediments to Fair Housing Choice Survey

3. When did the discrimination take place?

- I have not experienced any form of housing discrimination.
- Within the past year
- Over a year ago
- Over 2 years ago
- Over 3 years ago
- Over 4 years ago

4. Where did this incident of housing discrimination take place?

- I have not experienced any form of housing discrimination.
- Back Central
- Belvidere
- Centralville
- Downtown
- Highlands
- Lower Belvidere
- Lower Highlands
- Pawtucketville
- Ayers City/ Sacred Heart
- South Lowell
- The Acre
- Not sure of neighborhood/ Street name:

2010 Impediments to Fair Housing Choice Survey

5. Did you report the incident?

- I have not experienced any form of housing discrimination.
- No, I was afraid of retaliation.
- No, I didn't believe it would make a difference.
- No, it was too much trouble.
- No, I did not know where to report it.
- Yes, to:

7. Responding to Fair Housing Violations

1. If you or someone you know (i.e. a family member, neighbor, client etc.) were a victim of fair housing discrimination, where would you refer him/her in response to the incident? (select all that apply)

- Don't know
- HUD
- Attorney General
- MA Department of Housing and Community Development
- Neighborhood legal Services
- Fair Housing Center of Greater Boston
- An attorney

Other (please specify)

8. Disability & Fair Housing

1. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies, or practices to accommodate your disability? (For example, failing to install a handrail upon request)

- N/A
- No
- Yes

2010 Impediments to Fair Housing Choice Survey

2. If yes, when did the discrimination take place?

- N/A
- Within the past year
- Over a year ago
- Over 2 years ago
- Over 3 years ago
- Over 4 years ago

9. Additional comments/ concerns

1. Do you feel that the City's housing boards and commissions provide accurate representation to the different sub-populations of Lowell? (in regards to race, nation of origin, disability status, etc.)

- Yes
- No

2. Is there something in particular that the City can do to affirmatively further fair housing in Lowell?

- No
- Yes:

3. Any other comments/ suggestions?:

2010 Impediments to Fair Housing Choice Survey

4. What role do you play in the housing industry?

- In-need service provider
- Housing program manager
- Property manager
- Realtor or Broker
- Housing Authority Representative
- Banker/ Lender
- Builder/ Developer
- Home buyer/ renter (potential or recent)
- Other (please specify)

10. Please tell us a bit about yourself:

1. Please describe your housing and employment status: (check all that apply)

- | | | |
|---|--|--|
| <input type="checkbox"/> Homeowner | <input type="checkbox"/> Part of a large family (five individuals or more) | <input type="checkbox"/> Work in Lowell |
| <input type="checkbox"/> Renter | <input type="checkbox"/> Live alone | <input type="checkbox"/> Employed Full Time |
| <input type="checkbox"/> Landlord | <input type="checkbox"/> Single Parent | <input type="checkbox"/> Employed Part Time |
| <input type="checkbox"/> Have difficulty making monthly expenses | <input type="checkbox"/> Have children under six years of age | <input type="checkbox"/> Unemployed |
| <input type="checkbox"/> Living doubled up/ with friends, family | <input type="checkbox"/> Person with a disability or have a household member with a disability | <input type="checkbox"/> Student in Lowell |
| <input type="checkbox"/> Homeless | <input type="checkbox"/> Business owner | <input type="checkbox"/> Student outside of Lowell |
| <input type="checkbox"/> Part of a small family (4 individuals or less) | <input type="checkbox"/> Self-employed | |

2010 Impediments to Fair Housing Choice Survey

2. If you live in the city, in which neighborhood do you reside?

- | | |
|--|--|
| <input type="radio"/> Not a resident | <input type="radio"/> Lower Belvidere |
| <input type="radio"/> Back Central | <input type="radio"/> Lower Highlands |
| <input type="radio"/> Belvidere | <input type="radio"/> Pawtucketville |
| <input type="radio"/> Centralville | <input type="radio"/> Ayers City/ Sacred Heart |
| <input type="radio"/> Downtown | <input type="radio"/> South Lowell |
| <input type="radio"/> Highlands | <input type="radio"/> The Acre |
| <input type="radio"/> Not sure/ street name:
<input type="text"/> | |

3. If you are a resident, how long have you lived in the City of Lowell?

- Not a resident
- Less than 1 year
- More than 1 year but less than 5 years
- More than 5 years but less than 10 years
- More than 10 years

4. Ethnicity: (check all that apply)

- White
- Hispanic or Latino
- Black or African American
- American Indian/ Alaskan Native
- Asian
- Native Hawaiian/ Pacific Islander
- Other (please specify)

5. Age:

- | | |
|-----------------------------|-----------------------------|
| <input type="radio"/> <15 | <input type="radio"/> 35-44 |
| <input type="radio"/> 15-17 | <input type="radio"/> 45-54 |
| <input type="radio"/> 18-21 | <input type="radio"/> 55-64 |
| <input type="radio"/> 22-34 | <input type="radio"/> >64 |

2010 Impediments to Fair Housing Choice Survey

6. According to the table below, which category are you in?

- Category 1
 Category 2
 Category 3
 Category 4

Income Levels by Household Size

Household Size	Category 1	Category 2	Category 3	Category 4
1→	\$0-\$18,650	\$18,651-\$31,050	\$31,051-\$45,100	\$45,101+
2→	\$0-\$21,300	\$21,301-\$35,450	\$35,451-\$51,550	\$51,551+
3→	\$0-\$23,950	\$23,951-\$39,900	\$39,901-\$58,000	\$58,001+
4→	\$0-\$26,600	\$26,601-\$44,300	\$44,301-\$64,400	\$64,401+
5→	\$0-\$28,750	\$28,751-\$47,850	\$47,851-\$69,600	\$69,601+
6→	\$0-\$30,900	\$30,901-\$51,400	\$51,401-\$74,750	\$74,751+
7→	\$0-\$33,000	\$33,001-\$54,950	\$54,951-\$79,900	\$79,901+
8→	\$0-\$35,150	\$35,151-\$58,500	\$58,501-\$85,050	\$85,051+

11. Fair Housing Discrimination

Thank you for participating in this survey. If you have questions about this survey or how else you can participate in the development of the 2011 Analysis of Impediments to Fair Housing Choice Report please contact:

The City of Lowell,
 Department of Planning and Development
 978-446-7200

If you (or your client) believe you have been discriminated against, please contact:

The Fair Housing Center of Greater Boston
 59 Temple Place #1105
 Boston, MA 02111
 617-399-0491
info@bostonfairhousing.org

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