



CITY OF DOVER, NEW HAMPSHIRE

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Community Development Block Grant Program

# Analysis of Impediments

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

# Analysis of Impediments

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Department of Planning and Community Development

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## Introduction

**T**his document is intended to comply with federal regulations at CFR 91.21(e) and 91.225(a)(1) with regard to the jurisdiction's obligation to affirmatively further fair housing. This analysis has been prepared by the staff of the City of Dover's Department of Planning and Community Development.

The Fair Housing Act of 1968 required that all HUD programs be administered in a manner that would "affirmatively further fair housing." HUD identifies the Consolidated Plan as the document in which communities describe their fair housing efforts. The Consolidated Plan is a HUD-mandated document, which describes the housing and planning needs of the City and strategies for meeting these needs. The Consolidated Plan requires each entitlement jurisdiction to show its commitment to affirmatively furthering fair housing choice by:

- Conducting an Analysis of Impediments to Fair Housing Choice;
- Taking appropriate actions to overcome the effects of impediments identified through that analysis; and
- Maintaining records that reflect the analysis and actions.

According to HUD, impediments to fair housing choice are:

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

The process followed to conduct the Analysis of Impediments included:

- A comprehensive review of the City's laws, regulations, administrative policies, procedures and practices with regard to fair housing in Dover;
- An assessment of how those laws, regulations, policies, and procedures effect the location, availability, and accessibility of housing; and
- An assessment of public and private sector conditions affecting fair housing choice.

## Participants

This report has drawn on the expertise of several agencies, boards, and organizations with years of experience dealing with impediments to fair housing. Participants in this study

include: local non-profit housing providers, New Hampshire Legal Assistance, the Dover Housing Authority, the NH Association for the Blind, and the Seacoast Board of Realtors. **A brief questionnaire and an invitation to comment on any aspect of fair housing choice were sent to those organizations.** A complete list of these organizations is as follows:

- Strafford & Rockingham Continuum of Care (social service agencies)
- City of Dover Department of Planning and Community Development.
- City of Dover Department of Public Welfare
- Dover Housing Authority
- NH Legal Assistance
- NH Commission on Human Rights
- NH Housing Finance Authority
- Catholic Charities
- COAST
- United Way – Community Impact

## **Funding**

The City of Dover paid for this study through the application of Community Development Block Grant funds towards administration and planning staff.

## **Methodology**

In preparing this Analysis of Impediments to Fair Housing choice, the Department of Planning and Community Development, contacted a number of private and public agencies for their input on Fair Housing issues in Dover and the surrounding Strafford County, and possible impediments. The Department relied upon the following methods in developing this analysis.

Housing advocates and organizations representing minority and protected classes were solicited for their input using a brief questionnaire and an invitation to comment on any aspect of fair housing choice. To build on past efforts in Fair Housing planning, earlier studies were revisited and incorporated into this analysis. Housing and demographic data from the New Hampshire Housing Finance Authority (NHHFA), the U.S. Census, and Dover's Comprehensive Housing Affordability Strategy (CHAS) and Consolidated Plan were used as a base of information. Additional comments were sought from the private sector, including housing providers, and affordable housing advocates. Public sector involvement included the Inspection Services division of the Fire and Rescue Department, and the Dover Housing Authority, in addition to the Planning Department.

## **Background and Progress Update on Previously Identified Impediments**

The City of Dover, through the Community Development Block Grant program, conducted an Analysis of Fair Housing Choice in 2004. In the analysis, six public and one private impediment were identified:

1. The City's single family 7/8 acre (40,000 sq. ft. area) zoning requirement *contributes to* making the cost of land prohibitive for the development of housing affordable to low and moderate income households. The land area requirement is only one of several factors, including market conditions and demand in the region as a whole, which would be hard to influence with public policy revisions. It should be noted that single family lot sizes allowed range from 40,000 (not including wetlands) sq. ft. area in non-sewer/water areas to 12,000 sq. ft. area in the R-12 Zoning District with municipal sewer/water. It is arguably debatable if this issue constitutes a true impediment to fair housing choice given the adequate inventory of smaller parcels in other districts.
2. The Zoning Ordinance Allows Group Homes by Special Exception only, not by right, in only three of the City's zoning districts. The three districts, CBD, RM-U and O represent a small area of the City's Zoning district area. The city has moved to enlarge the RM-U district to encompass more land, area; however there is still limited land for adequate in-fill opportunities for such a use to reasonably locate. The Special Exception criteria and requirement for a public hearing opens the process up to NIMBY reactions that may influence decisions made by the Zoning Board.
3. The Zoning Ordinance currently allows the placing of mobile homes in the R-40 zoning district only if they are to be placed in a "mobile home subdivision". Households are prohibited from placing a mobile home on an existing, legal lot in the R-40 zone, but an owner subdividing a new, legal lot may place the mobile home if the wording "Mobile Home Subdivision" is placed in the title of the plat.
4. It has been estimated that over 40% of the rental housing stock in the jurisdiction have some amount of lead-based paint hazard on the premises. Low income and minority households tend to rent units which still have this hazard, simply because the rent amount is lower than other rental units. Because a unit's age, condition, and location define the rents, these are units that can least afford to be made lead-based paint free for the foreseeable future. affordable housing choice between lead-based paint contaminated and lead-based paint free rental units should not just be dependent on state laws prohibiting renting to families with children under the age of six, the ability of the units owner to pay for mitigation, or the ability of the household to pay more funds for the rent.
5. Large numbers of very-low and low-income homeowners are overpaying for their housing costs, and many are living in substandard housing. Sixty-nine percent of all very-low income homeowners in the City expend more than 30% of their gross income on housing costs and 45% of those expend more than 50% on housing costs. Most all of these dwellings have rehabilitation needs. These low-income homeowners are finding it difficult to refinance existing mortgages allowing reduced monthly debt service costs to draw on equity or to rehabilitate their homes. Low income and minority households also need assistance with down payment and closing costs to purchase a home. A NH Housing Finance Authority Market Analysis indicated that 47% of all renters have no resources at all for a down payment. Only 37% could obtain \$5,000.00.

6. The average waiting list time to get into public housing in the City remains between 1 to 4 months for small families, 3-10 months for large families and approximately 6 months for elderly and disabled.
7. Affordability of housing in general; In Dover-Rochester HMFA, the Fair Market Rent (FMR) for a two-bedroom apartment is \$1,008. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn NA monthly or \$40,320 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of \$19.38.

In Dover-Rochester HMFA, a minimum wage worker earns an hourly wage of \$7.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 119 hours per week, 52 weeks per year. Or, a household must include 3.0 minimum wage earner(s) working 40 hours per week year-round in order to make the two bedroom FMR affordable.

In Dover-Rochester HMFA, the estimated mean (average) wage for a renter is \$13.65 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 57 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.4 worker(s) earning the mean renter wage in order to make the two-bedroom FMR affordable. Monthly Supplemental Security Income (SSI) payments for an individual are \$637 in Dover-Rochester HMFA. If SSI represents an individual's sole source of income, \$191 in monthly rent is affordable, while the FMR for a one-bedroom is \$808. *A unit is considered affordable if it costs no more than 30% of the renter's income.*

- In New Hampshire, an extremely low income household (earning \$27,540, 30% of the Area Median Income of \$91,800) can afford monthly rent of no more than \$688., while the Fair Market Rent for a two bedroom unit is \$1020.
- A minimum wage earner (earning \$7.25 per hour) can afford monthly rent of no more than \$377.
- An SSI recipient (receiving \$637 monthly) can afford monthly rent of no more than \$191, while the Fair Market Rent for a one-bedroom unit is \$693.
- In New Hampshire, a worker earning the Minimum Wage (\$6.50 per hour) must work 119 hours per week in order to afford a two-bedroom unit at the area's Fair Market rent.
- **The Housing Wage in New Hampshire is \$19.38.** This is the amount a full time (40 hours per week) worker must earn per hour in order to afford a two-bedroom unit at the area's Fair Market rent. This is 298% of the minimum wage (\$7.25 per hour).

In the years since the last AI, the City of Dover has taken several steps towards alleviating these impediments by following actions:

1. The Planning Department has undertaken the process to amend the Zoning Ordinance (approved end of year 2009) by expanding the land area where group homes are allowed by right. This was done by adding group homes to the allowed use table in the Central Business District zone. The only caveat is that the facility be located on floors other than the first in buildings. Additionally, the former RM-6 and RM-8 zones were merged into the RM-U zone which also added land area where this use is allowed by special exception. Planning has undertaken a Zoning Board of Adjustment member training and education program each year that stresses the required criteria for approving special exceptions. The training focuses on each member's ability to recognize NIMBY testimony and to disregard it in the context of the group home (or any) application. Planning also has begun to review the housing chapter of the Master Plan and as part of the development of the chapter will conduct a study to ascertain which zoning districts would be appropriate to allow group homes by right. The next update process should begin next year with consultant requirements prepared and selection process started.
2. The Zoning Administrator has initiated research on new industry trends towards improvement in the mobile or modular home industry and compared those developments to its definitions section in zoning. Draft changes in zoning definitions will go through the initial process during the fall of 2010. In addition, the Planning Department will consider crafting another revision which allows for the placement of mobile homes on any legal lot in the R-40 zone, so long as the home and associated foundation and hook-ups meet all other applicable criteria to go forward through the next major zoning revision process, also tentatively scheduled for FY 2011.
3. The City continues to have a considerably higher number of public housing and government assisted rental units than all other communities in Strafford County. The City is proactive in maintaining this high number of units through its public and governmental agencies. This is an on-going action. Additionally, last year's major zoning changes have increased the potential for both in-fill and new housing opportunities within the Central Business District regulating zones by adhering to the new form-based code which allows residential units on all floors above the first.
4. The City Health Officer continues to work with State Health officials, local landlords, and City Fire/Life-Safety officials to reduce the number of lead-based paint units in the City. Lead-based paint hazard educational materials have been up front both in City Hall and the Fire Station Inspection Office for information dissemination to the general public. An outreach campaign on cable channel 22 is planned for next year. These are on-going actions.
5. (& 7.) Planning worked with both Catholic Charities and NHHFA to assist in relocation/placement of residents of an older, gentrified mobile home park in the City when that park was closed due to impending redevelopment. All former residents were successfully assisted into suitable housing. The City will continue to work proactively with the New Hampshire Housing Finance Authority when conditions merit such action. The City worked with the



Strafford Regional Planning Commission in their Housing Workshop series and Vision 20/20 Master Planning Initiative regarding ways to achieve affordable housing for the City and the region as a whole. The City will work to review and implement recommendations contained within the documents as they pertain to Dover, starting with the work on the new Housing chapter of the Master Plan. Planning offers rehabilitation loans to both low-mod income homeowners and elderly homeowners at 6% interest and 0% interest, respectively for the life of the load at \$20,000 maximum. A plan for information outreach on this continuing program on cable channel 22 is slated for fall 2010.

6. The Planning Department is playing an active role in the growth and development of the Housing Consortium to increase the availability of affordable and workforce housing for those in need. The Department will coordinate with the Consortium to provide education and outreach for available programs and opportunities to those with housing needs. The Planning Department has worked with the Dover Housing Authority to address wait list issues, and to that end, has facilitated the approval process for affordable housing managed by the DHA before the Planning Board.

## Jurisdictional Background

*This section describes Dover in 2010 using data collected as part of the Master Plan update in 2007.*

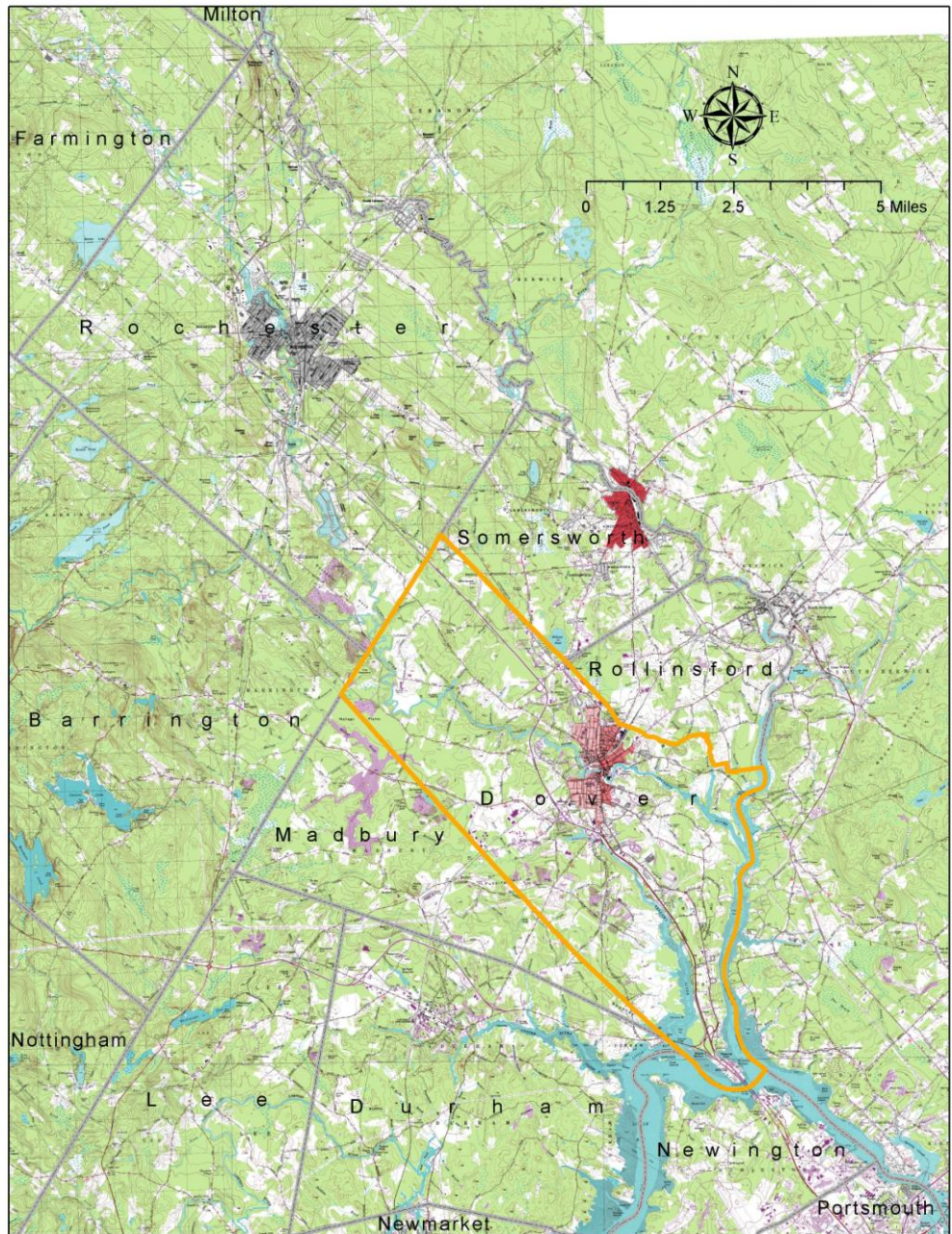
From a demographic and economic perspective, Dover is central to the Dover-Dover-Somersworth-Rochester corridor and is part of the larger Seacoast region of New Hampshire. The previous update to this chapter utilized a data center that became obsolete as a result of the 2000 census. In order to effectively compare Dover to surrounding communities, this chapter uses Strafford and Rockingham Counties for comparisons.

Information for this analysis was obtained from the following sources:

- City of Dover
  - Assessor's Office
  - Department of Planning and Community Development
- DemographicsNow (a private, third-party provider of detailed census data and forecasts)
- The New Hampshire Department of Employment Security
- The New Hampshire Office of Energy and Planning
- The U.S. Census Bureau
- Strafford Regional Planning Commission
- The Housing Justice Project of New Hampshire Legal Assistance

## Demographic Profile

The City of Dover is the county seat for Strafford County, which lies in southeastern New Hampshire, bordering the state of Maine. Dover is bisected by the Spaulding Turnpike (NH Route 16) which connects northern New Hampshire and the Seacoast region. Additionally, NH and US Routes 4 travel through Dover, as do Routes 155, 108 and 9.



*Exhibit 1 Dover*

**Population**

POPULATION	
2006:	29,068
2000:	26,884
1990:	25,042

Based on estimates provided by DemographicsNow, Dover had a 2006 population of 29,068, which represents an increase of 2,180 (8%) since 2000. This is slightly higher than the 7.3% growth rate that Dover experienced between 1990 and 2000. Dover remains the State’s seventh most populated community, and the second most populated in Strafford County. After the 2000 census, the

New Hampshire Office of Energy and Planning projected that by 2010, Dover's population would be 29,310. Presuming that the current growth rate of 364 people a year will move to the city between 2007 and 2010, this number would be shy by 1207 people. **Exhibit 2** shows the NH Office of Energy and Planning projected population growth trends and projections for the region.

<b>Projected Population for Dover and surrounding region</b>						
	<b>2005</b>	<b>----- Projections -----</b>				
<b>Municipality</b>	<b>Est.</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>
Barrington	8,180	8,510	8,990	9,450	9,900	10,270
<b>Dover</b>	<b>28,730</b>	<b>29,310</b>	<b>29,970</b>	<b>30,450</b>	<b>30,900</b>	<b>31,250</b>
Durham	13,440	13,840	14,480	15,070	15,630	16,100
Farmington	6,710	6,390	7,280	7,610	7,930	8,190
Lee	4,440	4,580	4,830	5,080	5,310	5,510
Madbury	1,750	1,800	1,880	1,950	2,020	2,080
Middleton	1,710	1,770	1,880	1,990	2,090	2,170
Milton	4,370	4,530	4,790	5,040	5,270	5,460
New Durham	2,490	2,640	2,920	3,180	3,440	3,650
Rochester	30,680	31,560	32,930	34,290	35,560	36,650
Rollinsford	2,660	2,740	2,870	2,990	3,100	3,190
Somersworth	11,880	12,080	12,290	12,480	12,950	13,350
Strafford	3,990	4,180	4,400	4,620	4,830	5,010
<b>Strafford County</b>	<b>121,020</b>	<b>124,490</b>	<b>129,500</b>	<b>134,210</b>	<b>138,930</b>	<b>142,890</b>
Brookfield	670	730	800	860	910	950
Newmarket	9,310	9,530	9,820	10,050	10,280	10,500
Northwood	3,980	4,120	4,300	4,450	4,600	4,740
Nottingham	4,370	4,560	4,810	5,010	5,220	5,420
Wakefield	4,780	5,150	5,540	5,930	6,270	6,490
<b>SRPC</b>	<b>144,130</b>	<b>148,580</b>	<b>154,770</b>	<b>160,510</b>	<b>166,210</b>	<b>170,990</b>
Exeter	14,560	15,070	15,580	16,040	16,500	16,930
Hampton	15,390	15,960	16,670	17,240	17,820	18,360
Portsmouth	21,000	21,320	21,990	22,730	23,610	24,390
*Berwick, ME	7,072	7,777	8,486	9,159	-	-
*Kittery, ME	9,119	8,471	7,640	6,611	-	-
<b>20 Mile Radius</b>	<b>211,271</b>	<b>247,178</b>	<b>225,136</b>	<b>232,290</b>	<b>224,140</b>	<b>230,670</b>

*Exhibit 2* \* Projection data only available up to the year 2020.

While the growth projections above may seem high for Dover, many communities in the region are anticipating a similar population increase. **Exhibit 3** documents the change in population for the New Hampshire communities within the region used for this plan. A quick scan of the table shows that the town of Middleton experienced a 44.5% population increase between 1990 and 2005. Dover experienced a 14.7% increase ranking 9<sup>th</sup> out of 13 communities in Strafford County. Of all New Hampshire communities in the region, Dover ranked 16<sup>th</sup> out of 21 communities. In fact, of all the communities in the study region during the previous 20 years, all have seen annual population gains, except for the City of Dover which has lost population each year.

### Population Change 1990 - 2005

County	Municipality	Change - 1990-2005	% Change - 1990-2005	Rate of Change - 1990-2005
<b>Strafford</b>	Middleton	527.0	44.5%	35.1
	Strafford	1,020.0	34.4%	68.0
	Barrington	2,011.0	32.6%	134.1
	New Durham	514.0	26.0%	34.3
	Madbury	344.0	24.5%	22.9
	Milton	681.0	18.5%	45.4
	Farmington	971.0	16.9%	64.7
	Rochester	4,054.0	15.2%	270.3
	<b>Dover</b>	<b>3,686.0</b>	<b>14.7%</b>	<b>245.7</b>
	Durham	1,625.0	13.8%	108.3
	Somersworth	631.0	5.6%	42.1
	Rollinsford	17.0	0.6%	1.1
	Lee	707.0	0.2%	47.1
<b>Carroll</b>	Brookfield	153.0	29.5%	10.2
	Wakefield	1,727.0	56.5%	115.1
<b>Rockingham</b>	Exeter	2,082.0	16.7%	138.8
	Hampton	3,116.0	25.4%	207.7
	Newmarket	2,149.0	30.0%	143.3
	Northwood	858.0	27.5%	57.2
	Nottingham	1,432.0	48.7%	95.5
	Portsmouth	-4,930.0	-19.0%	-328.7

 **Exhibit 3**

In 1990, the median age of the total population in the study area was 31.6, and in 2000, it was 35.5. The median age in 2006 was 37.1 and it is predicted to change in five years to 38.5 years. In 2006, females represented 52.0% of the population with a median age of 38.4 and males represented 48.0% of the population with a median age of 35.9 years. In 2006, the most prominent age group in this geography is age 25 to 34 years. The age group least represented in this geography is 15 to 19 years.

**Population by Race/Ethnicity**

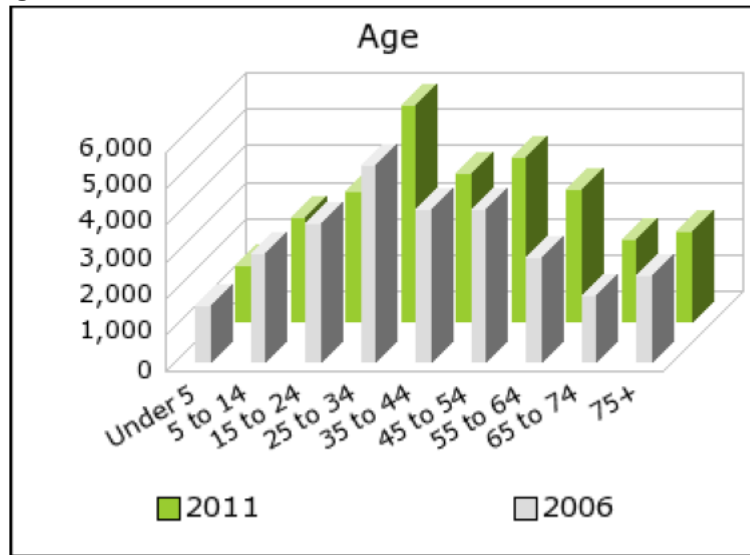
	<b>1990</b>		<b>2000</b>		<b>2007</b>		<b>2012</b>		<b>1990</b>	<b>2007</b>
	<b>Census</b>		<b>Census</b>		<b>Estimate</b>		<b>Projection</b>		<b>to</b>	<b>to</b>
									<b>2000</b>	<b>2012</b>
White	24,390	97.4%	25,396	94.5%	27,140	92.3%	28,488	91.6%	4.1%	5.0%
Black	265	1.1%	301	1.1%	485	1.7%	588	1.9%	13.6%	21.2%
American Indian or Alaska Native	53	0.2%	53	0.2%	85	30.0%	109	0.4%	-0.0%	28.2%
Asian or Pacific Islander	284	1.1%	650	2.4%	809	2.8%	907	2.9%	128.9%	12.1%
Some Other Race	50	0.2%	93	0.4%	171	60.0%	223	0.7%	89.0%	30.4%
Two or More Races			391	1.5%	712	2.4%	784	2.5%		10.1%
Hispanic Ethnicity	254	1.0%	306	1.1%	489	1.7%	615	2.0%	20.5%	25.8%
Not Hispanic or Latino	24,788	99.0%	26,578	98.9%	28,913	98.3%	30,484	98.0%	7.2%	5.4%

Census 2000 data indicates that New Hampshire is overwhelmingly white. In 1990, the percentage of white population of the city was 94.5%, and in 2007, it was 92.3. The change between 1990 and 2000 was modest at 4.1%, and appears to be increasing slightly in the projection above between 2007 and 2012 at 5.0%, which reflects the state’s changing status as a refugee resettlement state. Nevertheless, this changing demographic is still very low in the City.

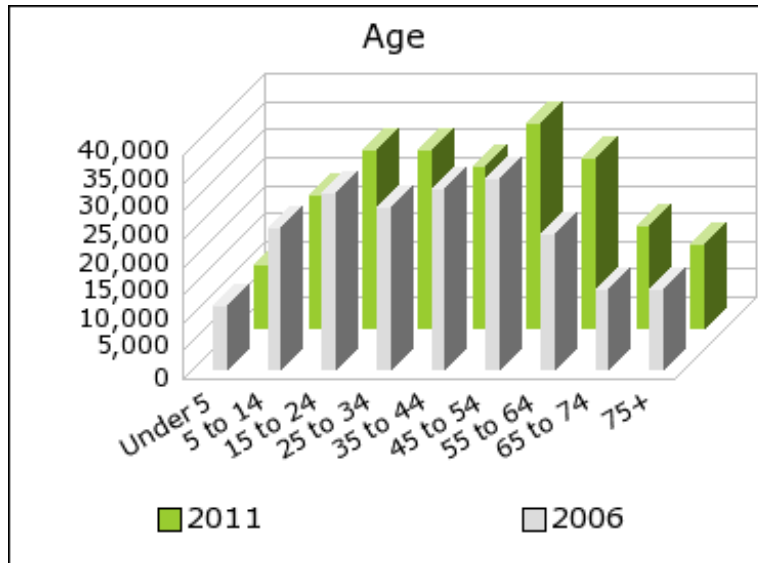
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For the region, the 1990 median age of the total population was 31.5, and in 2000, it was 36.3. The median age in 2006 was 38.8 and it is predicted to change in five years to 40.5 years. In 2006, females represented 51.4% of the population with a median age of 39.8 and males represented 48.7% of the population with a median age of 37.9 years. In 2006, the most prominent age group in this geography is age 45 to 54 years. The age group least represented in this geography is 0 to 4 years.

**Age**



*Exhibit 4: Distribution of Ages in Dover*



*Exhibit 5: Distribution of Ages in the region*

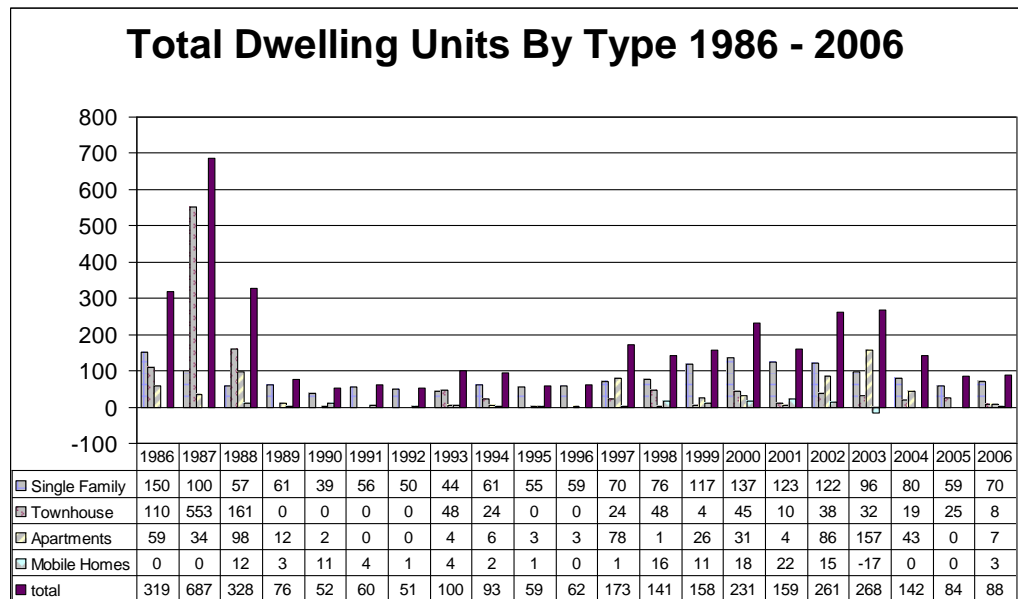
**Dwelling Units**

The City of Dover is comprised of 12,259 dwelling units, which represents an increase of 1,998 (7%) since 2000, and 3,829 (11.9%) since 1990. In 2005, Dover represented about 8% of the region's household base, which is essentially unchanged since 1990. Between 1990 and 2005, the region's household base increased by almost 25% - over ten percentage points more than Dover's growth over the same time period illustrating that Dover has grown at a much more moderate pace, compared to surrounding communities. The following Exhibit demonstrates the types of housing units built in the City of Dover over the past 20 years.

Type	Percent of total 1997	Percent of total 2006
Single Family	40%	80%
Apartment	45%	8%
Townhouse	14%	9%
Mobile Home	.5%	3%

As evident in the following Exhibit, there has been a leveling out in new home construction as of 2006. The average number of units constructed within the past 10 years is 170 a year; however this is almost double the 2005 and 2006 numbers.

In addition to the leveling off of the number of units constructed, there has been a shift from apartments towards single family units. This seems to be the direction residents support based upon the surveys and input from the public.



**Exhibit 6**

The study area (including Dover) experienced a faster growth rate for the number of households, than population. One explanation for this could be that household sizes continue to decline.



**Multi-Family Residential**

Zone	Acreage	Developable
RM-6	13	0
RM-8	184	30
RM-10	440	27
RM-12	364	0
RM-20	225	31
<b>Total</b>	<b>1,226</b>	<b>88</b>

Dover’s multi-family zones are located closer to the central core of the City. Cumulatively, there is a total of 88 acres of land available zoned primarily multi-residential.

The RM-8 (High Density Multi-residential District) is located north of Downtown, where there are parcels that have the potential for future conversion and build out. There is a pocket along Whittier Street of vacant land. The RM-8 zone allows for the full variety of mixed housing types and styles.

The RM-10 (Low Density Multi-residential District) is a zone that is located south of Downtown. This zone encompasses the region between Locust Street and the railroad lines west of Arch Street. There is also a pocket of the zone along Court Street. This zone allows conversion of larger single family and duplex buildings into 3 and 4 family buildings through a review by the Zoning Board of Adjustment.

RM-20 (Suburban Density Multi-residential District) zone is located along Durham Road and has some limited developable potential connecting adjacent to existing townhouse projects. There is an additional area of the zone along Knox Marsh Road, which has been fully built out.

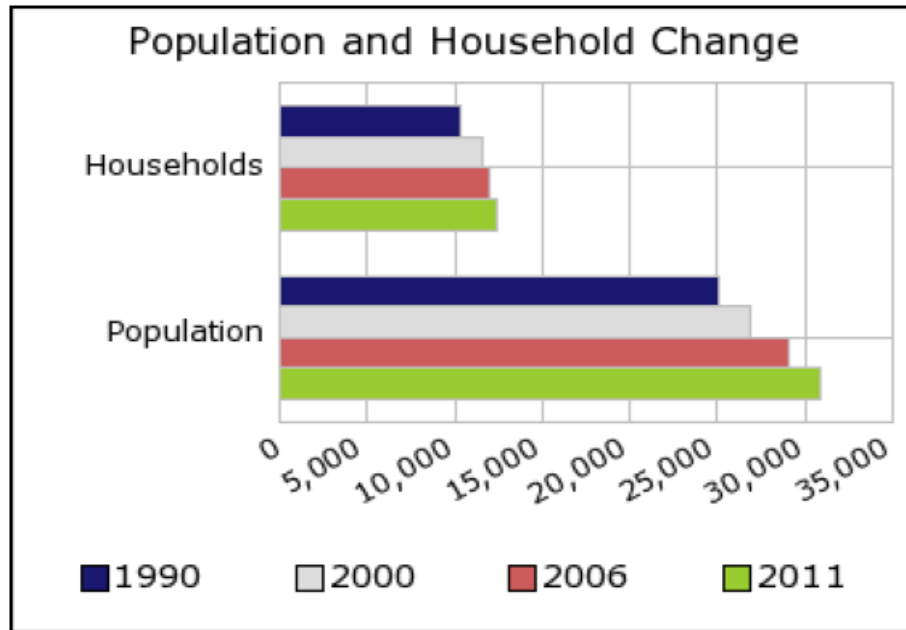
The city has converted areas from multi-residential – most notably along Back River Road, and Oak Street from multi-family to single family. This conversion is supported by the Speak Out Dover sessions as well as the Telephone Survey, where respondents encouraged single family residential over multi-family.

**Affordable Housing**

Dover continues to provide a wide range of housing options. Nearly 51% of the city's housing stock is renter occupied compared to 35% in the Seacoast PMSA. Dover continues to be a City with a diverse housing stock, varied in affordability and ownership. The strong mix of renter and owner-occupied housing units promotes a healthy demographic and economic diversity.

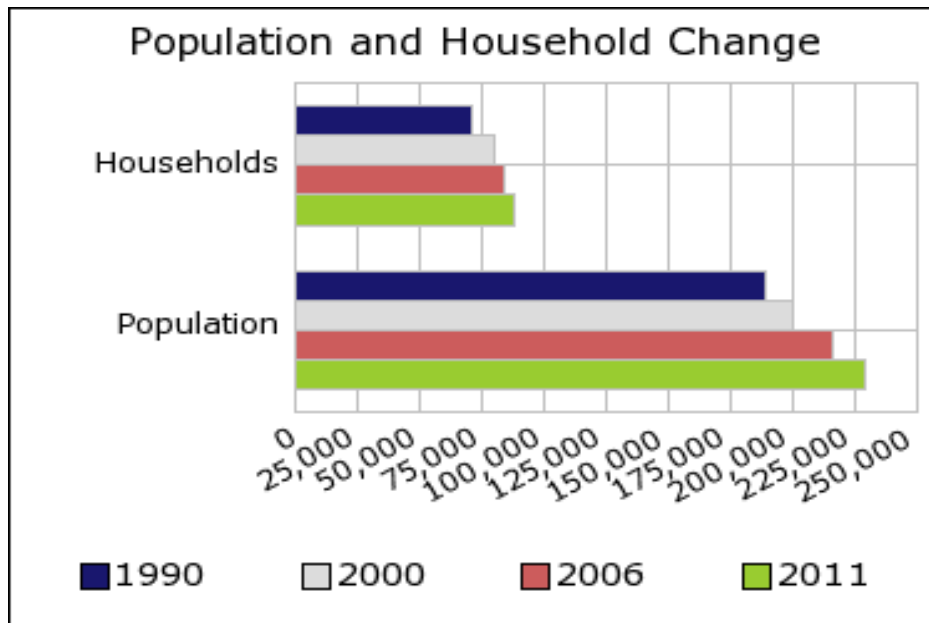
Dover has become an increasingly attractive community to live in, attracting more affluent residents that are drawn by the amenities. This attraction, obviously, has impacted housing costs. Comparatively, Dover is more expensive to live in than surrounding communities of Rochester and Somersworth, but less than Exeter or Dover. The increase in housing costs does have implications for the lower and middle class; however, Dover has continued to provide opportunities for affordable housing through its multi-family and mixed use zones.

The challenge for Dover is to continue to provide housing opportunities for all residents, particularly residents that are above the threshold for subsidized housing. The Dover Housing Authority offers many opportunities for diversity in housing. Additionally, The City offers low income loans for housing rehabilitation through the Planning Block Grant program.



*Exhibit 7: Dover's Population/ Household Change*

Projections between 2005 and 2010 indicate that Dover's household base may increase by 6.4% (788 households) – modestly below the growth rate of the region over the same time period. Chart 3 shows household growth trends and projections for the region.



*Exhibit 8: Regions' Population/ Household Change*

The number of households in the study area in 1990 was 70,600 and changed to 79,502 in 2000, representing a change of 12.6%. The household count in 2006 was 84,049 and the household projection for 2011 is 87,660, a change of 4.3%.

The population in the study area in 1990 was 188,888 and in 2000 it was 199,740, roughly a 5.7% change. The population in 2006 was 216,272 and the projection for 2011 is 229,273 representing a change of 6.0%.

**Household Income**

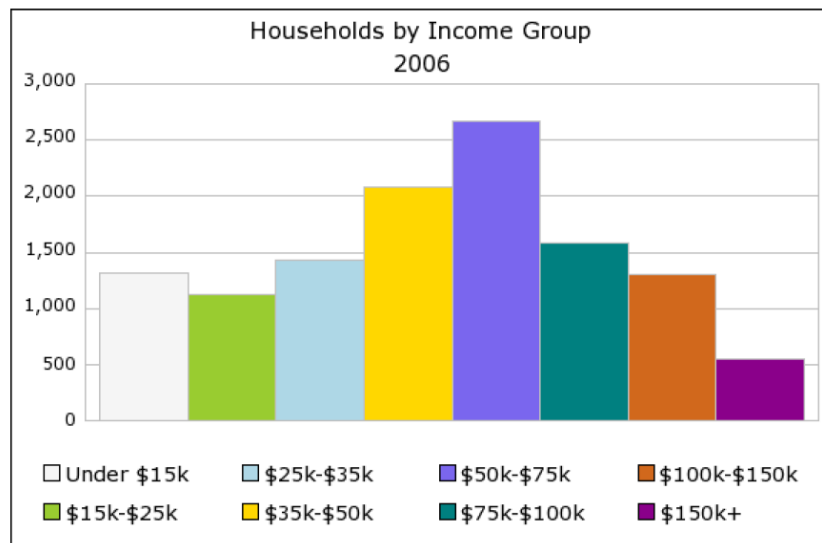
<b>DOVER</b>	
1990:	\$31,645
2000:	\$44,395
2006:	\$50,725

Over the sixteen years between 1990 and 2006, Dover’s household income has risen dramatically. According to the 1990 census, Dover’s median household income was \$31,645. By 2006 it was \$50,725, which represents an increase of \$19,080 (60%) during that period. Comparatively, Dover’s household income has been keeping pace with the region. During the same period, the region saw an increase of \$19,469 (58%).

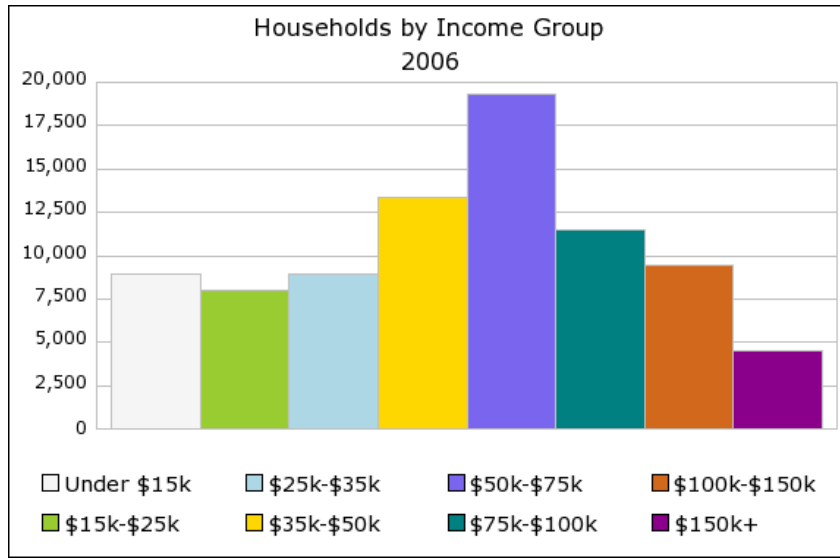
<b>REGION</b>	
1990:	\$33,436
2000:	\$46,484
2006:	\$52,905

Projections between 2006 and 2011 indicate that Dover’s median household income will increase by almost 8% (to \$54,986). The regions’ median household income is projected to increase by 8.3% to \$57,308.

In 2006 the predominant household income category in Dover, and the region, was \$50K - \$75K, and the income group that is least represented of both the region and Dover is \$150K +. This is evident that Dover is an economically diverse community.



*Exhibit 9: Dover’s Household Income*



*Exhibit 10: Region's Household Income*

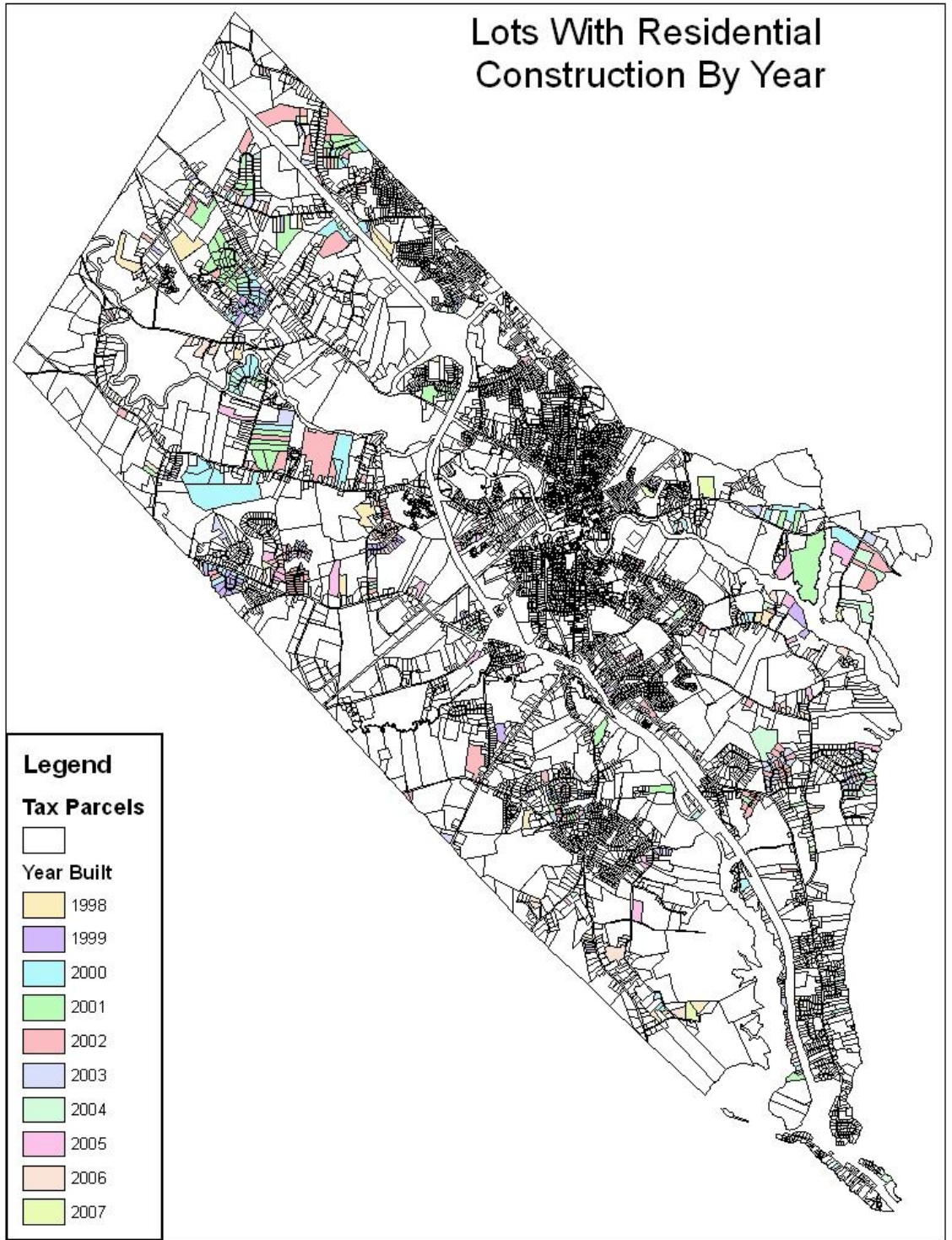
## Economic Trends

Economically, Dover acts as a hub for surrounding towns in Maine and New Hampshire. This is a homogeneous area, with many people working and shopping for goods and services in communities other than the one they live in. The region also attracts workers from other areas of New Hampshire, Maine and Massachusetts and serves as home for many people who commute out of the area on a daily basis. The most comparable geography to use in analyzing trends is the Census Bureau's Dover-Dover-Rochester Metropolitan Statistical Area (MSA)

### Residential Units built

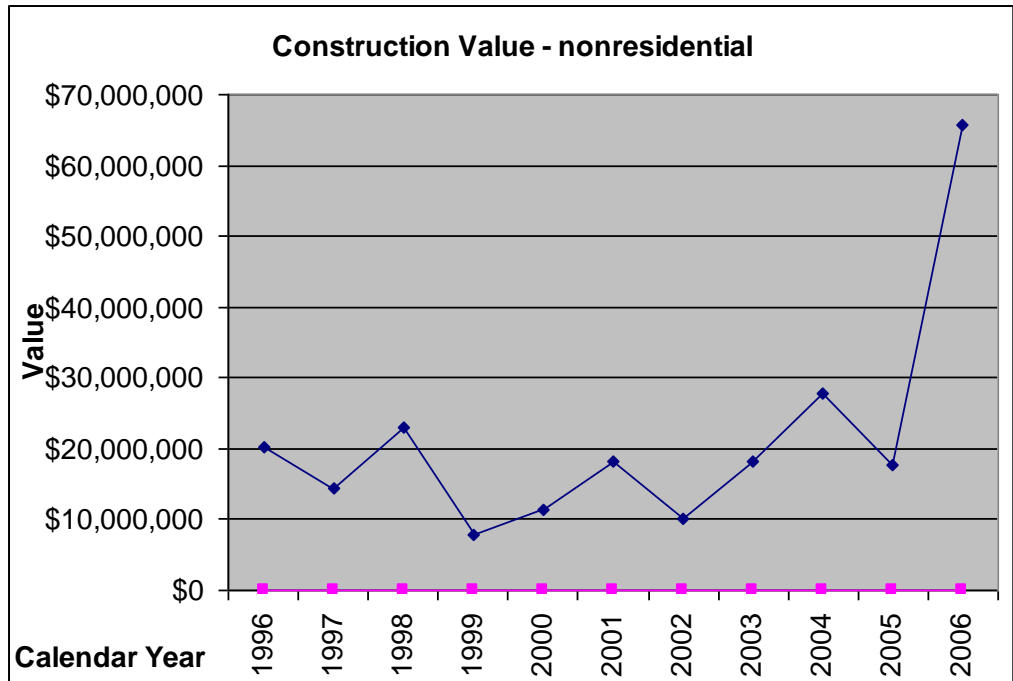
Residential growth in Dover hit an all time high in 1985, when 466 units were built. By contrast between the years 1998 and 2006, the most units created in a year were 268 in 2003. Over the 9 year period the average amount of units built was 130. This is up moderately higher than the 90 unit average over the previous 9 years.

# Lots With Residential Construction By Year



*Exhibit 11*

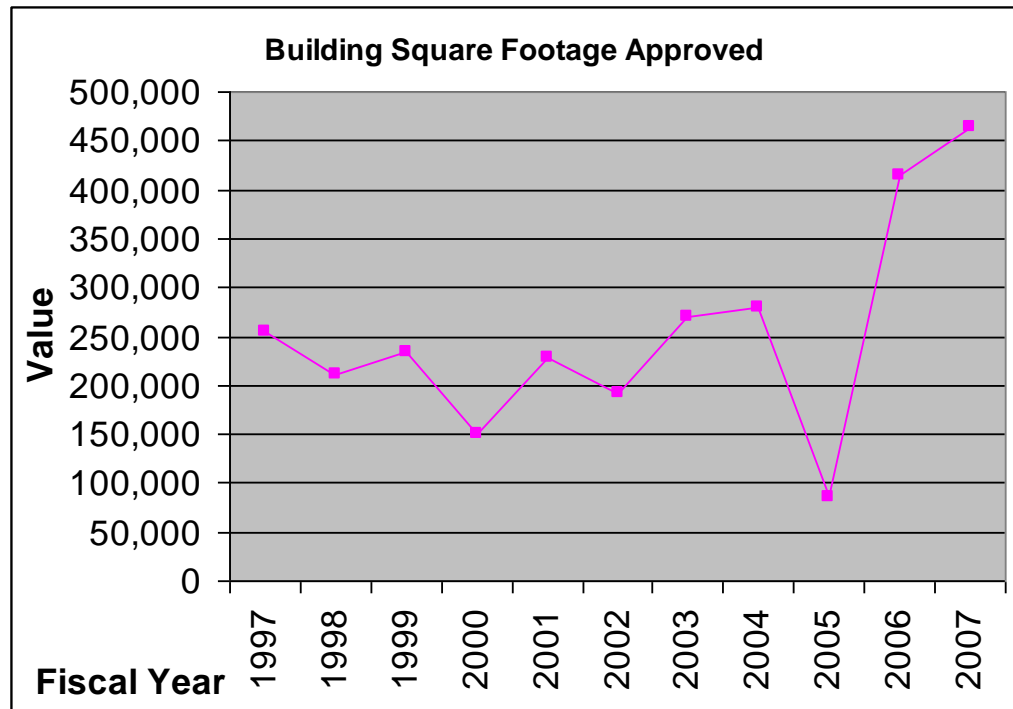
**Nonresidential Building**



*Exhibit 12*

Dover has continued to attract large scale, high quality non-residential projects. Since the 1998 chapter update, non-residential growth has fluctuated, ultimately trending upwards. In 2006 the City saw the addition of 2 hotels, as well as growth at Enterprise Park. Additionally, Liberty Mutual's 350,000 square foot addition on Liberty Way, coupled with the 2005 and 2006 additions by Measured Progress continue to increase the growth along Sixth Street.

In 2007, projects such as a 100,000 square foot medical office; a fourth hotel and restaurant along Indian Brook Drive will bring even more non-residential development to the Exit 9 corridor. In addition there has been the approval of the mixed-use development along Dover Point Road and Durham Road. The Durham Road project is slated to open phase 1 (45,000 square feet retail) in 2007, with the future build out reaching 82,000. The Dover Point project is expected to exceed 150,000 square feet of non-residential uses by 2012. All told, the City of Dover has approved 2,528,802 square feet of non-residential buildings over the previous 10 year period.



*Exhibit 13*

## Employment

In 2006, there were 17,588 people over the age of 16 in the labor force in Dover. 97.2% of these were employed, 2.6% were unemployed, 28.2% were not in the labor force and 0.2% was in the Armed Forces. In 1990, unemployment in this area was 5.6% and in 2000 it was 3.1%. Both of these numbers were below the regional unemployment levels of 6.2% in 1990 and 3.5% in 2000.

For the region, there were 124,182 people over the age of 16 in the labor force. Of these 95.4% were employed, 3.9% were unemployed, 29.6% were not in the labor force and 0.4% were in the Armed Forces.

In 2006, there were 15,033 employees in Dover (daytime population) and there were 1,510 establishments. This compares to 95,892 employees in the region (daytime population) with 10,629 establishments.

For Dover in 1990, 63.5% of employees were employed in white-collar occupations and 36.5% were employed in blue-collar occupations. In 2000, white collar workers made up 68.6% of the population, and those employed in blue collar occupations made up 31.4%.

For the region in 1990, 58.5% of employees were employed in white-collar occupations and 41.5% were employed in blue-collar occupations. In 2000, white collar workers made up 62.4% of the population, and those employed in blue collar occupations made up 37.6%.

For a Dover resident in 1990, the average time traveled to work was 13 minutes and in 2000 it was 19 minutes. Comparatively, the region experienced an average travel time to work of 13 minutes in 1990 and in 2000 it was 21 minutes.

**Wages**

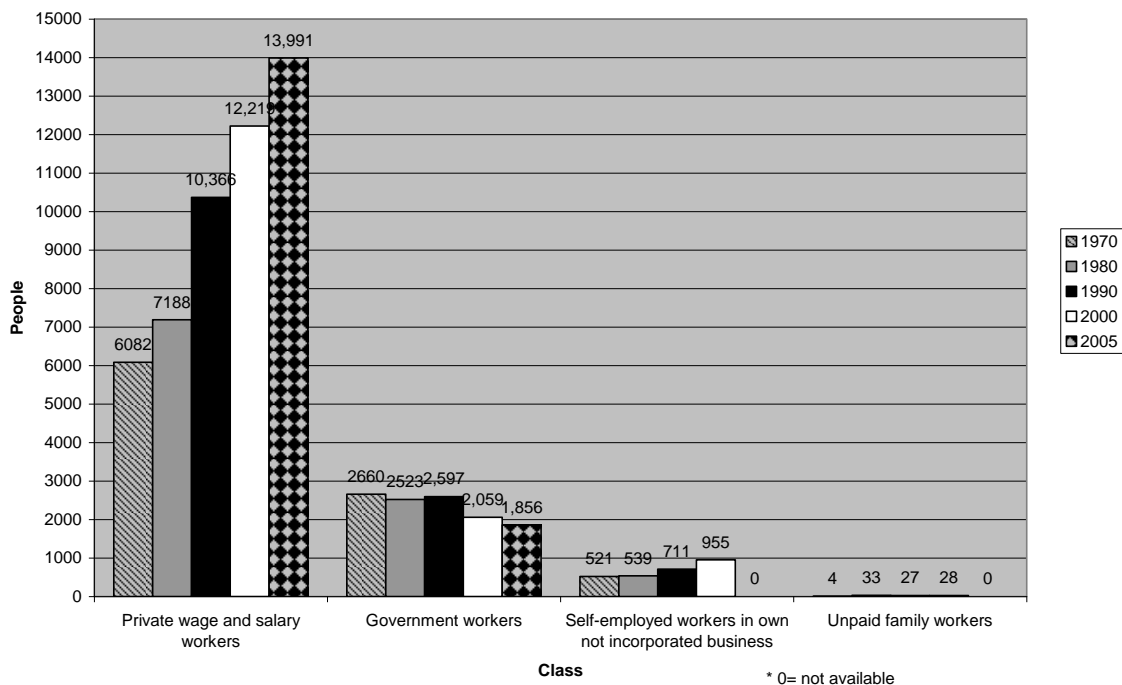
NAICS Code	Industry	Units	Average Annual Employment	Average Weekly Wage
	Total, Private plus Government	903	15847	\$746.60
	Total Private	873	13991	\$757.40
101	Goods-Producing Industries	122	2439	\$862.80
11	Agriculture/Forestry/Fishing	N/A	N/A	N/A
21	Mining	0	0	\$0.00
23	Construction	N/A	N/A	N/A
31-33	Manufacturing	53	2041	\$884.60
102	Service-Providing Industries	751	11553	\$735.10
22	Utilities	N/A	N/A	N/A
42	Wholesale Trade	67	465	\$1,068.40
44-45	Retail Trade	115	1737	\$567.70
48-49	Transportation and Warehousing	13	300	\$666.00
51	Information	20	810	\$706.60
52	Finance and Insurance	N/A	N/A	N/A
53	Real Estate and Rental and Leasing	47	178	\$587.50
54	Professional and Technical Service	91	505	\$1,045.60
55	Management of Companies/Enterprises	8	247	\$1,334.20
56	Administrative and Waste Services	63	785	\$557.50
61	Educational Services	16	378	\$653.20
62	Health Care and Social Assistance	122	2820	\$813.40
71	Arts, Entertainment, and Recreation	N/A	N/A	N/A
72	Accommodation and Food Services	75	1333	\$273.10
81	Other Services Except Public Admin	67	438	\$585.40
99	Unclassified Establishments	N/A	N/A	N/A
	Total Government	30	1856	\$665.40
	Federal Government	3	120	\$783.80
	State Government	12	114	\$539.20
	Local Government	15	1622	\$665.50

*Exhibit 14: Dover's 2005 Wage/Employment Levels*



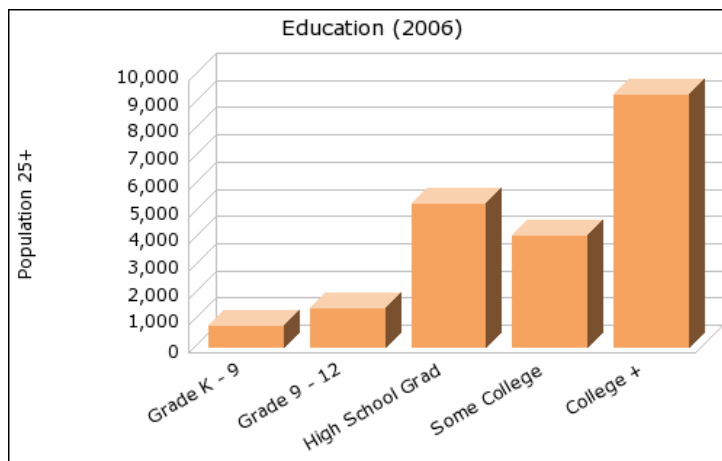
**City of Dover  
Class of Workers**

Data Set: 1970 Census Table 104, General Social and Econ. Characteristics  
 Data Set: 1980 Census Table 128, General Social and Econ. Characteristics  
 Data Set: 1990 Summary Tape File 3 (STF 3) - Sample Data  
 Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

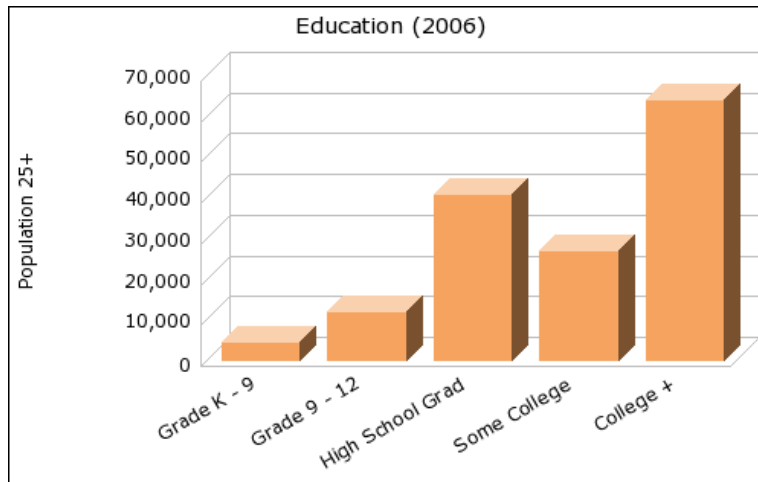


*Exhibit 15*

**Education**



*Exhibit 16: Dover's Education Attainment Levels*



**Exhibit 17: Region's Education Attainment Levels**

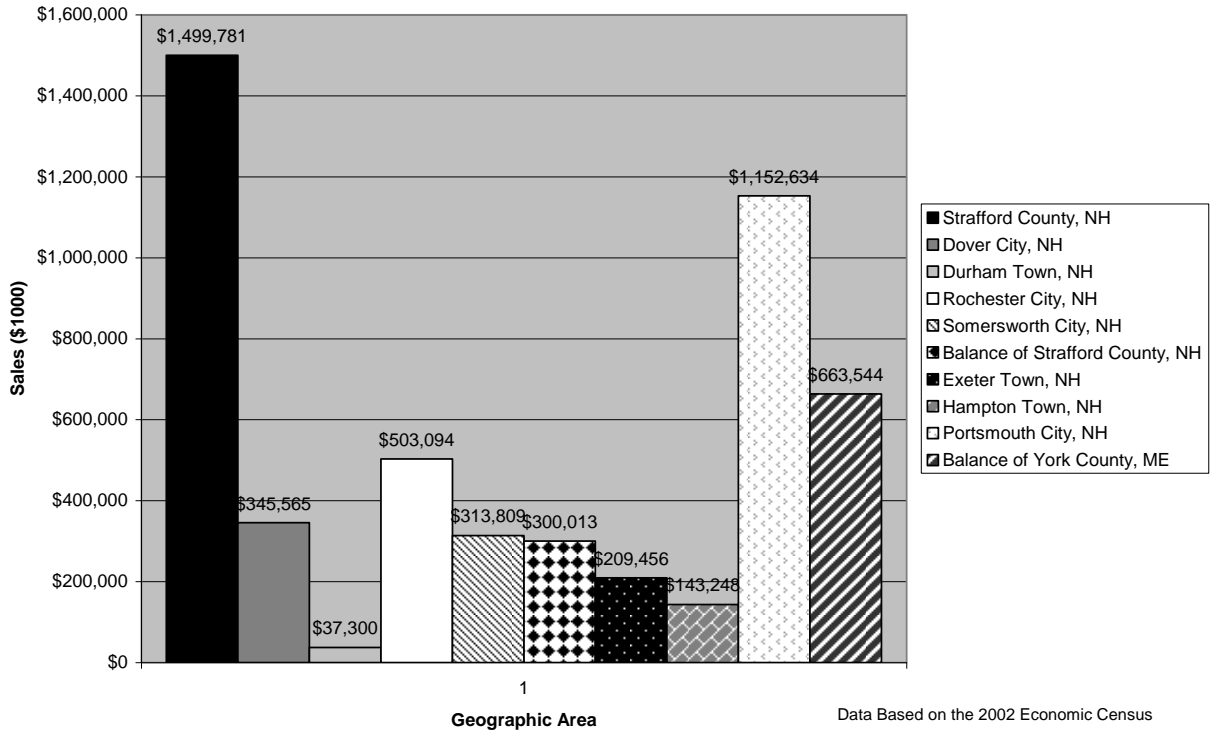
2006 PERCENTAGE	
Grade K - 8	3.9%
Grade 9 - 12	6.8%
High School Graduate	25.3%
Some College, No Degree	19.7%
Associates Degree	9.6%
Bachelor's Degree	23.1%
Graduate Degree	11.6%

These numbers indicate that Dover is attracting a more educated demographic and residents are encouraged to receive a higher education level.

Educational attainment had a profound impact on the local economy, and the eligibility of residents for available jobs: According to the Bureau of Labor Statistics Occupational Outlook Handbook, occupations which require a bachelor's degree or above will average 23% growth almost double the 12% growth expected for occupations that require less education and training. The City is looking to continue to attract jobs within the top job growth fields (health care or technology-related), which require high levels of education.

# Retail Sales

## Retail Sales Within 25 Miles



### DOVER

TOTAL:	\$48,373
RETAIL:	\$21,294
%:	44

### REGION

TOTAL:	\$51,350
RETAIL:	\$22,569
%:	44

### Exhibit 18

Dover has shown competitive retail sales with surrounding communities and captures 24% of the total retail sales in Strafford County. This is slightly above Somersworth and the remainder of Strafford County. Rochester exceeds Dover, but benefits from a larger retail area to the north. Comparatively, the City of Dover, with a larger retail sector, brings in 76% of all of Strafford County's retail sales.

According to DemographicsNow!, Dover's 2006 annual household expenditure is \$48,373, with \$21,294 dedicated to retail purchases. It is estimated that this will rise 5.1% to \$50,834 by 2011. This compares to a regional household expenditure of \$51,350, with \$22,569 being spent on retail purchases. The region is expected to have its household expenditure levels rise to \$53,999 in 2011, which represents a 5.2% increase. In both the region and Dover, retail expenditures are 44% of total household expenditures.

## **Current Fair Housing Legal Status**

*This section describes any complaints or findings of discrimination found in Dover.*

**A** review of the code enforcement complaint forms as well as a review of any correspondences with the Department of Housing and Urban Development indicates that there have been no findings of discrimination or complaints in Dover. Additionally, there have been 2 fair housing discrimination suits filed by the Department of Justice or private plaintiffs.

Housing Justice Project (HJP) attorneys and paralegals promote equal access to housing for NHLA clients by working on preserving their housing. In addition the HJP fights housing discrimination by investigating complaints of discrimination. The HJP also helps individuals and families in emergency situations who are either currently without shelter or are at imminent risk of becoming homeless. The nearest office is located in Portsmouth.

The HJP handles housing cases such as:

- Section 8 or public housing issues
- Mortgage foreclosure
- Property Taxes
- Mobile home park issues
- Fair Housing/housing discrimination complaints
- Housing accessibility issues for persons with mobility disabilities

NHLA's Housing Projects NHLA focuses its efforts on a variety of housing issues with its Housing Justice Project (<http://www.nhla.org/housing.php#housing>).

Housing Justice Project (HJP) attorneys and paralegals promote equal access to housing for NHLA clients by working on preserving their housing by eviction defense work in subsidized housing, and manufactured housing parks. In addition the HJP fights housing discrimination

by investigating complaints of discrimination involving any of the ten protected classes in NH, and by providing full legal representation to enforce fair housing laws. The HJP helps individuals and families in emergency situations who are either currently without shelter or are at imminent risk of becoming homeless to ensure access safe shelter and connection to the resources available to them to move out of homelessness. The HJP is also working to slow the steady stream of homeowners losing their homes to foreclosure by assisting them to file bankruptcy and save their home and re-organize their debt. The HJP also does a considerable amount of community outreach to tenants, housing providers and social service agencies about tenants' rights and general fair housing law.

The FHP receives more housing discrimination complaints than any other entity in New Hampshire (See Part IV, Section B). The FHP investigates and litigates state and federal fair housing claims in state and federal court, at the HRC and HUD. It operates the only fair housing testing program in the state. It engages in community outreach initiatives through community education forums, community conferences, and targeted mailing campaigns, distribution of fair housing pamphlets and posters, and production of public service announcements for radio. The City feels this is essential that education of individuals regarding their rights and obligations under fair housing laws continues and participates in these practices.

## Protected Classes

Federal law prohibits housing discrimination on the basis of race, color, religion, sex (gender), familial status (families with children under eighteen), national origin, or handicap (disability) (42 U.S.C. § 3604). New Hampshire fair housing law includes all of the federal protections and adds three more categories: age, marital status, and sexual orientation (NH RSA 354-A: 8). "Protected classes" is the term of art used to describe these categories. This section discusses the ten "protected classes" and provides information regarding each group including impediments.

1. Race Census 2000 data indicates that New Hampshire and Dover in particular, is overwhelmingly white. Although there is some evidence that suggests that racial discrimination is a problem state-wide, there is no testing program designed to document incidences of discriminatory behavior based on race, nor have random calls to rental agencies, service agencies or Dover Public Welfare uncovered any. The African American population of New Hampshire is small and therefore it is more difficult to discern patterns of discriminatory behavior. Testing is often the most effective method of rooting out more subtle forms of discrimination, and the department will work with whatever agency proposes to initiate testing in our jurisdiction.

2. Color Complaints based on color are generally associated with the primary complaint of racial or sometimes national origin discrimination. As a primary complaint type, color accounted for no complaints during the reporting period. No additional information regarding trends or anecdotal reports surfaced during the research for the AI.

3. National Origin Dover's population is overwhelmingly white and of European descent. Census 2000 data indicates that although only 4.4% of New Hampshire residents were born in foreign countries (to non-U.S. citizens), a quarter of them entered the U.S.

between 1990 and 2000. As a refugee resettlement state, New Hampshire welcomes 200 to 600 refugees annually, but this has not significantly affected the City as of the date of this report. Housing discrimination based on national origin had no complaints filed with both HUD and NHLA during the reporting period. Asian origin is the highest continuing percentage in the City that seeks assistance from Dover Public Welfare. The City is proactive in referring to the Dover Adult Learning Center (DALC) and to appropriate ethnic church programs. Language does not appear to be a barrier in the City, because there is a strong presence and outreach for the Dover Adult Learning Center (DALC) with its English as a Second Language course and assistance. The City provides first class space and assistance to DALC and it is housed in the convenient McConnell Community Center.

4. Religion There were no complaints based on religion filed by Dover residents. No additional information regarding trends or anecdotal reports surfaced during the research for the AI.

5. Gender There have been no cases filed or findings that landlords have engaged in sex-based discrimination by adopting and enforcing a facially neutral policy which had a disparate impact on female victims of domestic violence. The Emergency Shelter and Homeless Coordination Commission Annual Report for July 1, 2001 – June 30, 2002, published by the New Hampshire Department of Health and Human Services Division of Behavioral Health, found domestic violence to be a significant reason for homelessness in New Hampshire, but no cases are apparent in Dover.

6. Disability Census 2000 data for New Hampshire indicated that 193,893 persons age five or older reported having mental or physical disabilities. Most of the disability-based cases handled by the FHP involve requests for accommodations and/or modifications necessary to allow a person with disabilities equal access to housing and/or full use and enjoyment of his home. In these cases, there is no violation of the law until a housing provider denies a request for a reasonable accommodation and/or modification. State-wide agencies have engaged in outreach efforts with many of them and have provided fair housing training to housing providers, as well. Dover Inspection Services and the City's Housing Standards Board, Social service and health care providers refer many complainants to the FHP or NHLA. There were only two fair housing cases in the City of Dover from January 2007 through December 2009. Both cases were complaints based on disability – the clients were looking for accommodations in their apartments due to their disability (for example – moving to a first floor because of mobility limitations).

7. Familial Status Familial status is defined as families with children under age 18 and includes households in which a minor is domiciled with parents, persons with legal custody of a minor, designees of the parent or persons with legal custody, pregnant women, and families in the process of receiving legal custody of a minor. A landlord may not deny housing to a person or family because of the presence of children, limit families with children to certain floors or areas of buildings, increase required security deposits for families with children or alter typical lease provisions for families with children. Each year since 1998, familial status housing discrimination has been the second largest area of complaint in the state, second only to mental and physical disability complaints, however outreach and research of classified ads, NHLA materials and rental agencies has uncovered no instances of this barrier in the jurisdiction.

8. Age Age discrimination shows no cases in Dover, which is a college housing community. There is no evidence indicating that landlords will refuse to rent to individuals who are older than the typical college age student, and refuse rentals to even slightly older individuals, sometimes allowing housing to remain empty during summer recesses to rent to students during the school year. Reasons suggested for this practice include ability to rent at higher prices to students, students' lack of familiarity with landlord/tenant laws and the rights they afford, and desire to keep families with children out of housing. For families or individuals in the community seeking scarce rental units however, the practice represents a barrier. While this may be a practice elsewhere, there have not been any indications of this type of complaint during the reporting period.

9. Marital Status There have been no cases reported regarding this protected class. No additional information regarding trends or anecdotal reports surfaced during the research for the AI.

10. Sexual Orientation New Hampshire added this protection in 1998. It comprises 1% of complaints filed with the FHP state-wide, but there have been no instances of this filed within Dover.

## **Additional Impediments**

1. Housing for Older Persons New Hampshire state law provides exemptions to provisions regarding familial status and age discrimination for certain housing for older persons under RSA 354 A: 15. Exempted housing includes housing which is provided under a state or federal program which is determined by HUD to meet the requirements for housing designed and operated to assist elderly persons, housing intended for and occupied solely by persons 62 years of age or older, and qualified housing intended and operated for occupancy by at least one person age 55 years or older per unit.

However, Housing complexes and manufactured housing parks claiming to be 55 or older housing, but which are not actually qualified, are not exempt from housing discrimination laws regarding familial status and age. New Hampshire RSA 354-A: 15, IV lists three factors which point toward determining if housing is qualified. First, in order to qualify as elderly housing for persons age 55 or older, 80 % of the housing must be occupied by at least one person 55 years of age or older. In addition, in order to qualify as elderly housing for persons 55 years of age or older, the housing facility must provide significant services and facilities specifically designed to meet the physical or social needs of persons 55 or older, and publish and adhere to policies which demonstrate an intent by the owner or manager to provide housing for persons 55 years of age or older. While the law sets up the necessity that a housing provider meet certain qualifications to be exempt from familial status and age discrimination provisions, there is no agency or group in New Hampshire which monitors whether housing is qualified and can therefore legally discriminate, nor are there reporting requirements regarding qualifications. Therefore, housing complexes and manufactured housing parks, may attempt to utilize the first provision requiring that all residents be 55 or older to deny housing to a younger family when the law only requires 80% of units to have a person over 55 years of age. Similarly, a housing provider may utilize the first provision requiring that all tenants in a unit be 55

or older to deny housing to a household with members under 55 years when the law only requires one tenant per unit to be 55 or older. These improper denials by housing providers are compounded when the housing provider has not met the legal standards for exemption yet restricts access on the basis of age and familial status and presents another barrier to fair housing. To be qualified as housing for persons age 55 or older, housing must offer significant services and facilities specifically designed to meet the physical or social needs of older persons. Merely calling itself a housing complex for persons age 55 or older is not sufficient. There is reason to believe that many housing providers, especially manufactured housing parks, call themselves 55 or older housing without being qualified. Given the lack of oversight of housing for older persons in New Hampshire, absent private challenge to policies, these practices persist and a number of housing providers continue to misuse the exemption for housing for older persons to illegally discriminate against families with children and younger individuals. Given these circumstances that may exist within the jurisdiction, it is noted that there have been no complaints or cases filed during the reporting period. Planning will continue to monitor the classified ads for this type of representation and take appropriate steps to notify the proper agency and follow through with local coordination efforts.



## **Impediments to Fair Housing Choice**

### **Identification of Impediments to Fair Housing Choice**

The Planning Department updates the 2004 "Analysis of Impediments (AI) to Fair Housing Choice Report" with this report. The following narrative examines public and private sector practices that may impact fair housing choice. The categories used were those identified in the HUD Fair Housing Planning Manual (Section 4.3 Volume 1: AI Subject Areas). If a public or private sector practice had a negative impact on fair housing choice, it was included on the list of impediments to fair housing choice. Information used to complete the list was obtained from a variety of sources. Planning staff consulted with the New Hampshire Legal Assistance Fair Housing Project, New Hampshire Housing Finance Authority, Dover Public Welfare, Dover Housing Authority, and the NH Commission on Human Rights to learn about housing complaints or comments regarding Dover. The Department utilized recently published materials, which discuss issues relevant to the analysis. These documents included:

- Dover Housing Authority 5-year Plan 2005-2009
- Dover Master Plan, , 2007-2009
- Dover Housing Authority 2009 Annual Plan
- Twenty Years of CDBG, Dover Planning Department
- DemographicsNow Demographic Trend Summary Report for Dover, NH, 2007
- Homeless Needs Assessment Report for New Hampshire's Greater Seacoast Region, 2010

All of these sources of information, were reviewed by planning staff, and used to identify fair housing impediments and the actions necessary to address them. All of these documents and other relevant press coverage and meeting notes related to this analysis are on file in the Planning Department.

#### **Impediments Found**

This report has resulted in the designation of three impediments to fair housing, in addition to numbers 2, 3, 5 and 7 that were identified in 2004 (which are still being addressed; refer to Section One): education and awareness of fair housing issues, affordability of units of greater than two bedrooms and transportation availability.

**Lack of Education Awareness**

Education and Awareness Discussions with the NHLA Fair Housing Project, the questionnaires from local housing organizations and advocates, and the section on Protected Classes in Section 3, resulted in the identification of lack of education and awareness about fair housing issues as an impediment to fair housing in Dover. The Fair Housing Project has received two discrimination complaints from Dover residents over the reporting period. This information, coupled with input from advocates participating in the questionnaires, gave the Planning Department cause to identify a lack of education and awareness as having a negative impact on fair housing choice and, therefore, includes this as an impediment to fair housing. It is also apparent from surveys that those in need in of fair, affordable housing do not have a clear picture of which agency (ies) provides which service. Because the region does not have a central, large city and has several smaller cities and two counties that have a home-work corridor running through it, there are multiple agencies that handle or refer all types of fair housing issues and complaints. Since there doesn't appear to be a concise inventory of service agencies for the public or for local jurisdictions to use for referral, this contributes to the lack of education and awareness as being an impediment.

**Affordability of greater than 2 Bedroom Housing**

A majority of the respondents to the Planning Department's solicitation for comments on fair housing identified affordability of family-sized units as an impediment to fair housing. While the city has programs and policies, targeted to meeting local affordable housing needs for larger families, housing affordability continues to be a high local and regional issue. Dover is both a regional job center and a bedroom/student housing community within a relatively high-cost housing market area, given that Portsmouth and Durham housing is higher than Dover's, yet Dover is higher than the rest of the County. Dover Public Welfare reports a backlog of larger families requesting units with three or more bedrooms that are affordable. The rents for three + bedroom units are currently increasing. These units are in short supply and those that are available are running approximately \$300.00 over the typical 2 bedroom unit price. Dover's jobs-to-housing balance has changed over the past decade, along with other changes in the local and regional economy. Generally, the jobs-to-housing ratio is considered to be out of balance, resulting in higher housing costs in the community and higher commuting costs for employees in local businesses. Home-work patterns follow NH Route 16 (Spaulding Turnpike), NH Route 108 (parallel route), Interstate 95 and the NH Route 101 corridors which run through multiple jurisdictions and promote bedroom communities. Along with the transformation of the local economy, Dover has become increasingly desirable as a place to live, attracting new and more affluent residents who are drawn by the amenities offered by the City and the Seacoast region. Demographics shows these more affluent families as requiring an average of two bedroom units, therefore the predominance of new affordable housing starts during the reporting period have been two bedroom units. Student housing demand also takes its toll on the numbers of affordable, larger units available within the City.

**Dover Public Housing & Section 8 Voucher Availability**

<b>Public Housing</b>	
Number of Units	458
Number on Wait List	523

Estimated Wait Time	4 Months – 5 Years (depending on type)
<b>Section 8 Vouchers</b>	
Number of Vouchers	347
Number on Wait List	524
Estimated Wait Time	6 Months – 5 Years

### **Public Transportation Availability**

Public Transportation Availability was not identified in the previous AI as a barrier to housing choice, but should have been. That it is now is more a result of what has been accomplished to ameliorate the impediment over the past two years.

Since 2008, the transportation system linking individuals with disabilities, senior citizens and those earning low and moderate incomes and other protected classes has improved dramatically due to the planning, funding and implementation of Dover’s FasTrans service, which consists of three additional Dover-centric routes operated by the Cooperative Alliance for Seacoast Transportation (COAST) for the City, and federal grants matched by local dollars, which fund the transit service. Important new transit routes are the bus services now available along Knox Marsh Road, Sixth Street and County Farm, Locust Street, Broadway, Portland Avenue and service areas adjacent. These routes are designed to be flexible and with calls, can be diverted to pick up those in diversion areas. This is important because there are many multi-family housing complexes located on these routes whose residents benefit because they do not have vehicles. These transit routes connect multifamily, affordable housing units (a portion of which is subsidized through DHA or other local agencies) in Dover’s outlying areas and urban housing with downtown, services, government agencies and the Community Center as well as the Dover Transportation Center, the Community Trail and a major office park, inter-city bus terminal and park ‘n ride and job centers. In addition to the creation of new routes for COAST buses, the system has an accessibility program, which ensures that those with mobility impairments can access its transportation services. Half-fare privileges are extended to seniors (65 years and older), people with disabilities, and individuals possessing a valid Medicare card. COAST also provides paratransit services for persons who are unable to ride the bus because they have a disability. Despite these improvements and additions to the public transportation system, there are still gaps in getting those in need of fair and affordable housing to assistance and to jobs because of the nature of the regions jurisdictions and the fragmented nature of its funding mechanisms.

## **Conclusions and Recommendations**

Four out of the seven impediments identified in 2004 remain impediments to fair housing choice. The City continues to make efforts to address these four issues. Refer to Section One for actions currently being undertaken or planned for action within the next two years on these remaining impediments.

Following are the goals, strategies and recommendations for actions regarding the three impediments identified in this report:

**Impediment 1: Education and Awareness**

The CDBG program plans to continue its work with New Hampshire Legal Assistance to provide informational sessions and literature to Dover residents regarding fair housing issues. The City and NHLA's Fair Housing Project will target these efforts to particular populations in need, including those in the mental health field.

**Recommendations: Education about Fair Housing Issues**

Develop and implement a Public Awareness Program targeting realtors, landlords, leaders & management companies that sheds light on the fact that affordable housing initiatives can serve as a platform for creating jobs, encouraging vitality and sustainability.

Continue to support New Hampshire Legal Assistance's Fair Housing Program and help them identify which groups and organizations to target for their educational sessions.

Develop an information campaign targeting rental property managers and realtors addressing fair housing requirements on Housing Disabled Persons to focus on accessibility and visitability.

Add a Fair Housing Issues page to the City Website that includes an inventory of service agencies and also includes links to the Governor's Commission on Disability homepage, the NH Commission for Human Rights homepage, NH Housing Finance Authority homepage, the HUD Fair Housing homepage and other salient links.

**Impediment 2: Housing Affordability**

The limited supply of greater than two bedroom unit affordable housing continues to be a very important local and regional issue. The goals, objectives and strategies identified in the City's draft Master Plan acknowledge this and seek to address this issue. There are several approaches available, which may be used to alleviate the deficit in the affordable housing supply, especially larger units for families. Strategies for achieving these goals appear below.

**Recommendations: Housing Affordability**

Goal

Maintain and expand the existing range of housing options in order to sustain neighborhoods and to accommodate households with varying needs.

Objectives

- Maintain housing options that include a range of unit size and structure types, tenure types, and cost levels.
- Support the development of home/work housing for very small business owners.
- Support creative options to meet changing housing needs.
- Establish partnerships with developers to build affordable housing for middle income households.
- Promote affordable downtown rental and ownership housing options on upper floors for residential households.

- Enhance the ability of residents on a limited income (including seniors) to remain in Dover.

#### Strategies

Publicize the need for 3+ bedroom apartments to developers. New Hampshire Housing has created a public education compact disc presentation on the statewide housing shortage and its impact on housing choice. This will be used as a local tool for disseminating information on real needs as they do consults with the Planning Department.

Promote the development of mixed-income multifamily housing at appropriate locations along major corridors.

Continue to work in partnership with housing agencies to apply subsidies (such as low income) to support the development of workforce housing.

Continue to encourage the creation of affordable apartments in upper floors of downtown buildings.

- Continue to modify zoning to accommodate desired residential development. The process has begun with Dover's Form Based Downtown Code and Mixed-Use development Overlay district options that require and allow residential use on the upper floors of new and in-fill development, thereby creating mixed use housing in association with commercial development and redevelopment.

Review existing regulations and development definitions affecting senior accessory apartments.

Continue City programs that provide incentives for low to moderate income first-time homebuyers to purchase homes in Dover. Continue to promote mixed-use development along corridors.

#### Goal

Achieve a coordinated and balanced regional approach to meeting shared housing needs.

#### Objectives

- Partner and coordinate on education and advocacy about regional housing issues.
- Promote creative regional solutions to housing development to keep pace with changes in population and job growth.
- Use the City's resources to support regional affordable housing development.

#### Strategies

Participate in regional partnerships to inform community members about housing issues and to develop regional solutions.

Participate actively in the development and updating of the Regional Housing Need Assessments prepared by the Strafford Regional Planning Commission.

Support research by area housing agencies to study the feasibility of a regional housing trust fund to accept property, raise capital, and otherwise promote the development of affordable housing in the Dover area.

Work with the Dover Housing Authority to establish lower cost rental housing developments in abutting communities.

#### Goal1

Preserve the City's affordable housing supply.

#### Objectives

- Avoid net losses in the affordable housing stock from commercial redevelopment.
- Enable the continuity of low to moderate income occupancy within the assisted rental housing supply.

#### Strategies

Evaluate the potential for zoning ordinance provisions that support the preservation or replacement of affordable housing affected by redevelopment.

Work to preserve affordability in existing subsidized rental housing by monitoring the potential expiration of subsidy commitments and income or rent limitations in the developments. Work to facilitate agreements, incentives, or refinancing packages to preserve affordability in affected projects, partnering with agencies such as the Dover Housing Authority and the New Hampshire Housing Finance Authority.

Continue the City's housing rehabilitation efforts using CDBG and other funds to improve housing stock serving low to moderate income homeowners and renters.

#### **Impediment 3: Public Transportation Availability**

Continue the City's FasTrans initiative by providing for local match funding and program administration and coordination of route needs with COAST.

Increased service frequencies on existing routes and new routes are part of the City's Transportation Improvement Program (TIP) and Capital Improvement Plan (CIP) for sustained funding. Funding analysis of the sustainability of continuing to fund the City's FasTrans program continues and future analysis will be used to recommend whether the City's transportation fee (paid at vehicle registration time) needs to be increased or not.

Transportation infrastructure upgrades and enhancements will continue to be developed based on ridership needs and surveys developed jointly with the City's partner, COAST.

Partner with the regional transit organization, the Alliance for Community Transportation (ACT) to prepare implementation steps to eliminate individual social service agency transit and form a regional transit network.