



Analysis of Impediments to Fair Housing Choice

Department of Housing & Community Development



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I. EXECUTIVE SUMMARY

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) from local jurisdictions receiving federal housing and community development funds including Community Development Block Grant (CDBG) funding.

The overall goal of the AI is to review and assess impediments to fair housing within Troy.

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 that restrict housing choice or the availability of housing choices.
- Any actions, omissions, or decisions that have the effect 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 AI consists of seven components including:

1. Executive Summary;
2. Introduction;
3. Jurisdictional Background Data;
4. Evaluation of the Jurisdiction's Current Fair Housing Legal Status;
5. Identification of Impediments to Fair Housing Choice;
6. Assessment of the Current Public and Private Fair Housing Programs and Activities in the Jurisdiction; and
7. Conclusions and Recommendations.

Planning Preparation and Process

The AI was developed in conjunction with the 2010-2014 Consolidated Plan and required extensive outreach, consultation, and coordination among various government agencies, private groups, public service agencies, City staff, and individuals. A comprehensive list of participants can be found in Appendix D.

Citizen Participation

The City of Troy understands the importance of citizen participation in the development of the AI and conducted extensive public outreach during the AI process including consultation with local public service agencies and commissions and with State organizations. A Fair Housing Survey was conducted and available for public and private organizations that provide services essential to fair housing and to the public to gather input relevant to fair housing efforts and impediments to fair housing in Troy. The AI was also published for a public comment period of 15 days.

The City held a public hearing related to the AI on July 1, 2010 which was made available to social service organizations and the general public. The City also held a 15 day public comment period to solicit feedback on the AI from June 17 – July 1, 2010.

Fair Housing Initiatives

Fair housing initiatives are critical to ensuring equal housing opportunity within a community. A key element to achieving this goal is by updating the previous Analysis of Impediments to Fair Housing Choice. The previous AI was first conducted in February 1995 and was updated as part of the 2005-2009 Consolidated Plan.

The City of Troy has continued to implement various housing and public service programs to assist with furthering fair housing efforts. In addition, State agencies provide an array of fair housing services including fair housing training and educational outreach.

Federal Resources

The primary federal resources for the City are the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), and Emergency Shelter Grant (ESG) programs through the U.S. Department of Housing and Urban Development (HUD). The total estimated funding for the City of Troy for fiscal year 2010 is \$2.2 million of CDBG funds, \$700,000 in HOME funds, and \$91,000 in ESG funding.

II. INTRODUCTION

Title VIII of the Civil Rights Act of 1968 (and subsequent amendment in 1988) mandates that it is unlawful to discriminate in the sale, rental, or financing of housing or, in the provision of brokerage services or facilities in connection with the sale or rental of housing, based on:

- Race;
- Color;
- Religion;
- National origin;
- Sex;
- Families with children; and
- Persons with handicaps.

The U.S. Department of Housing and Urban Development (HUD) requires that all recipients of federal funds under the Community Development Block (CDBG), HOME Investment Partnership (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Troy receives CDBG, HOME, and ESG funding annually and therefore is required to update its Analysis of Impediments to Fair Housing Choice (AI).

The City's previous AI was first conducted February 1995 and updated as part of the 2005-2009 Consolidated Plan by the City of Troy. The purpose of this study is to update the AI in accordance with HUD regulations under 24 CFR 570.904(c)(1) for Entitlement grantees of the U.S. Department of Housing and Urban Development. The City is committed to furthering fair housing within Troy.

Who Conducted the Study

The City's Community Development Department is responsible for the administration and implementation of the CDBG, HOME, and ESG programs and is the lead agency for the update of the Analysis of Impediments to Fair Housing Choice. The Community Development Office coordinated efforts with numerous other public service agencies and conducted extensive public outreach in preparing the AI.

Participants

To ensure compliance with citizen participation requirements and that all relevant information was gathered, the City utilized various resources in conducting the AI and collaborated with individuals and groups that represent the special interests of protected groups. A fair housing survey was provided online and a draft of the AI was available to various fair housing organizations and low-and moderate-income persons and families for comment. Participants included:

- Troy Community Development Department;
- Troy Housing Authority;
- Troy Rehabilitation and Improvement Program, Inc. (TRIP);
- NYS Division of Human Rights; and
- NYS Division of Housing and Community Renewal's Office of Fair Housing and Equal Opportunity.
- The Troy Independent Living Center

Additionally, the AI was published for a 15 day public comment period and during the preparation of the 2010-2014 Consolidated Plan, public hearings were held April 1st and May 6, 2010 to solicit public input. Meetings were available to the public, various public service agencies, and non-profit organizations taking a special interest in housing-related activities. A comprehensive outreach list can be found in Appendix D.

Methodology

The preparation of the AI included identifying strengths and weaknesses in fair housing practices and recommending courses of action to improve upon deficiencies found during the study. The analysis included a review of jurisdictional background data including demographics, income, employment, and a housing profile. To properly update the AI it was also necessary to perform a comprehensive review of local laws, regulations, ordinances, and policies related to housing or affecting housing patterns and practices in Troy. The AI was prepared in accordance with HUD's [Fair Housing Planning Guide, Vol. I.](#) Below demonstrates the approach taken during the AI process and the components reviewed.

Demographics and Trends

Utilizing resources such as the U.S. Census Bureau, HUD, and local studies demographic and housing data was collected for the City of Troy to determine any patterns or trends that may indicate a

concentration of protected classes in any one area of the City. Data collected and analyzed also included employment, income, and other relevant data.

Information on the availability of housing, including various housing types and sizes, affordability levels, and accessibility for disabled persons was also reviewed.

Data Collection

Data collection included an analysis of fair housing choice and any limitations due to existing conditions within the City or surrounding localities. A comprehensive review and assessment of current land use policies, local laws, ordinances, and practices that may affect fair housing choice within the City of Troy was conducted. The review included an assessment of local codes that may influence the availability or accessibility of housing to protected groups including minorities, families with children, or people with disabilities. Policies, processes, procedures, or local decisions that may be a barrier to fair housing and impede the approval of construction assisting in the creation of subsidized and private housing was also reviewed.

Data collection also included an evaluation of local public policy and if it keeps housing and community development resources from areas with a large concentration of minorities or people with disabilities. Administrative policies were also reviewed.

Information related to the public and private sector was analyzed including zoning and site selection, neighborhood revitalization, municipal and other services, public and assisted housing tenant selection procedures, sale of subsidized housing, property tax policies, planning and zoning boards and building codes.

Data regarding fair housing enforcement, informational programs, and visitability in housing was collected and lending policies and practices was analyzed using the Home Mortgage Disclosure Act (HMDA) and Private Mortgage Insurance Companies (PMIC).

Maps

Maps were utilized to identify housing, job, and transportation relationships, areas of racial/ethnic integration and segregation, and locations of choices for publicly assisted housing.

Maps also provide information regarding where within the City housing for families with children and persons with disabilities is in short supply, as well as locations of multifamily complexes providing housing for families with children and the disabled.

Investigations and Enforcement Status and Performance

An evaluation and assessment of fair housing status and performance was conducted. HUD was utilized as a resource to analyze any complaints or compliance reviews where the Secretary has issued a charge

or made a finding of discrimination and verification with the Department of Justice regarding any suits filed was also made.

Assessment of Housing Programs and Activities

The City of Troy's current programs and activities and accomplishments already made to further fair housing were reviewed and included in the Analysis of Impediments.

Conclusions/Recommendations

Impediments identified and recommendations for addressing each impediment are included in the AI to assist the City in eliminating barriers to fair housing choice.

Funding

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), the City of Troy is required to conduct an Analysis of Impediments to Fair Housing Choice. The City supports fair housing and encourages citizen participation in identifying impediments to fair housing within the community. Information included in the AI will allow the City to continue efforts to improve fair housing throughout the community.

Funding is imperative to implementing activities and projects focused on continuing fair housing efforts. The City of Troy expects to receive approximately \$2.2 million in CDBG funding, \$700,000 in HOME funds, and \$91,000 in ESG funding for the 2010 fiscal year. Other key agencies involved in promoting fair housing include the Troy Housing Authority, the State of New York's Office of Fair Housing and Equal Opportunity and the State of New York's Division of Human Rights.

Conclusions

The City gathered all pertinent data for the preparation of the AI including collecting demographic data, performing a comprehensive review of public sector laws, regulations, ordinances, and policies, and reviewing private sector lending policies and practices, fair housing enforcement, informational programs, and visitability in Troy. The Analysis also included an assessment of local fair housing programs and activities. The City consulted with various fair housing organizations and also conducted a fair housing survey which provided valuable input for the preparation of the plan. Review and assessment of the data presented in this analysis along with input received for various organizations and the public identified the following impediments to fair housing in Troy:

- High income levels and fees requested to rent apartments limits choices for persons on fixed incomes;
- Limited financial assistance for the elderly/low-income/disabled;

- Lack of accessible housing and accessibility barriers are impeding fair housing opportunities for persons with disabilities;
- Lack of affordable owner-occupied housing;
- Inadequate supply of Section 8 housing units;
- Discriminatory or unethical practices by landlords;
- Lack of available vacant land in Troy to build affordable housing;
- Lack of education regarding fair housing laws;

There are various approaches and actions the City can take in an effort to remedy fair housing impediments. Recommendations for resolutions to impediments and the continuation of fair housing efforts are detailed in Section VII of this Analysis of Impediments to Fair Housing Choice. The City may implement specific recommendations to address fair housing needs and selected actions will be determined by the amount of funding available to address impediments, priority community needs, and actions that are in the best interest of Troy residents.

III. JURISDICTIONAL BACKGROUND

Bordered by the Hudson River, the City of Troy is located in Rensselaer County and acts as the county seat. As of 2000 the City's population was recorded at 49,170. The City is rich with history with many of its buildings representing nineteenth century American architecture. Natural waterways, including the Erie Canal, surround the City and powered the mills that made the City of Troy an industrial leader by the mid-nineteenth century. Troy is historically known to have led the nation in iron and steel production at one time, as seen in the iron railings adorning the City's brownstones today.

DEMOGRAPHIC DATA

Population

As of 2000 the City's population was recorded at 49,170. As of July 2007 Troy's population has decreased by approximately 2.7% to 47,744. The City's population is approximately 32% less than Rensselaer County's population in 2000 which was 152,538.

Age

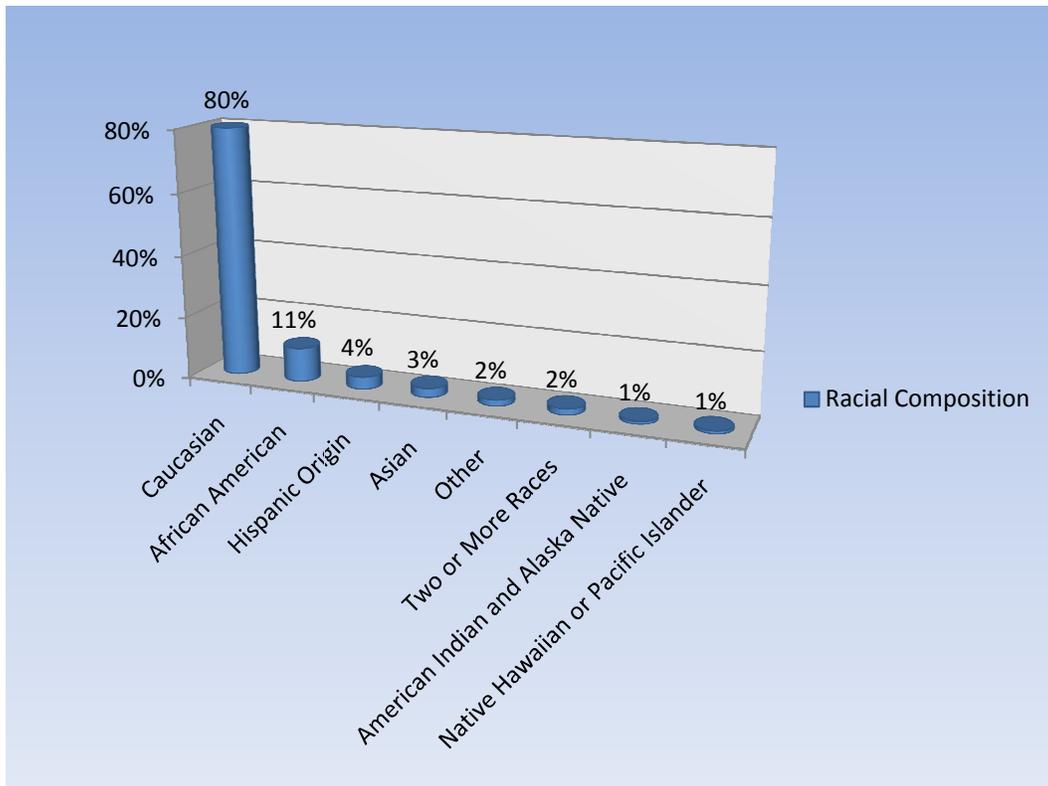
Age trends within a population can be useful in identifying various needs within the community such as the need for senior housing or possibly the need for youth or senior services. Understanding the age patterns of the City will aid in evaluating existing public services for the entire population as well as housing needs or other public service needs that may need to be developed. Trends identified through census data indicates that the median age of Troy residents has decreased in 2005-2007 to 31 and that residents under the age of 18 for 2005-2007 decreased to 21% as compared to 25% nationwide. The presence of three colleges located in the City of Troy impacts the age of residents and leads to residents ages 20-24 being the largest segment of the population at 13%.

- The median age of Troy residents in 2000 was estimated at 32 years, as compared to 38 years for Rensselaer County.
- Residents under the age of 18 make up 22% of the City's population.
- Seniors, or residents 65 years or older account for 14% of Troy's population.

Race/Ethnicity

It is important to recognize the racial and ethnic composition of the City when developing the Consolidated Plan. This information should also be evaluated when studying the Community Development Block Grant (CDBG) target areas and any trends within the target areas should be identified. The racial composition of the City of Troy is shown below in *Figure 1*. Actual percentages for the American Indian/Alaska Native and the Native Hawaiian/Pacific Islander categories are less than 1%.

*Figure 1
Racial Composition*



Source: U.S. Census Bureau

INCOME DATA

Being aware of the income profile for the City of Troy is an important factor that can help identify the needs of low-and moderate-income persons and reveal income trends leading to poverty in specific target areas throughout the community.

Median Household and Family Income

The City's household income has increased from 1999 to 2007 according to the census but still remains lower than the County's median household income.

- Median household income in 1999 was \$29,844.
- ACS estimates a median household income increase as of 2007 at \$34,981.
- Median family income in 1999 was \$38,631.

- Median family income in 2007 was \$39,501.
- Rensselaer County’s median household income in 1999 was \$42,905.

HUD Income Levels

HUD uses the area median family income (AMI) to determine eligibility for HUD programs such as the Community Development Block Grant (CDBG) program, the HOME Investment Partnership (HOME) program, and the Emergency Shelter Grant (ESG) program. The AMI distinguishes families and individuals that are extremely low income, low income, and moderate income, meaning that their income is at or below 80% of the AMI. The AMI establishes areas within the City that have a high percentage of low-to moderate-income persons. Areas identified as having at least 51% low-to moderate-income persons are recognized as target areas for the purpose of the Consolidated Plan and for proposed activities to be undertaken by the City. *Figure 2* below shows HUD’s income levels for the CDBG, HOME, and ESG programs.

*Figure 2
HUD Income Levels*

<i>Income Level</i>	<i>%AMI</i>	<i>Income</i>
CDBG		
<i>Extremely Low</i>	0-30%	<i>Less than \$21,200</i>
<i>Low</i>	31-50%	<i>\$21,201-\$35,300</i>
<i>Moderate</i>	51-80%	<i>\$35,301-\$56,500</i>
HOME		
<i>Extremely Low</i>	0-30%	<i>Less than \$21,200</i>
<i>Very Low</i>	31-50%	<i>\$21,201 - \$35,300</i>
<i>Low</i>	51-80%	<i>\$35,301 - \$56,500</i>

HUD 2008 Income Levels

Source: HUD 2008 Income Limits

**The income limits in this table are based off the median family income for a family of four.*

**Persons entering permanent housing through HUD’s ESG program must be “very low income”.*

ECONOMIC DATA

Employment

The City of Troy's work force has been affected by the current economic climate and similar to the rest of the country the City continues to face an increase in unemployment rates since 2000. Census data reveals that the City of Troy had 24,841 persons age 16 and over in the labor force as of 2000, with 2,913 unemployed. Labor force numbers fell in 2007 to 24,391. Unemployment rates increased from 7.4% in 2000 to 10.5% in 2007.

Troy residents maintain being involved in the City's workforce through several employment sectors. In 2000, management and professional occupations attest for the largest sector of employment for males while sales and office occupations employed the majority for females. The previous Consolidated Plan revealed that prior to 2005 Troy lost nearly 20% of its retail establishments. The loss of retail stores affects the current number of females employed in the sales occupations, but according to City-Data.com office occupations still remains the largest sector employing females as of 2008.

The City of Troy is home to three collegiate level institutions which accounts for educational services being a large industry for the work force. Retail trade and public administration are also in the top five for most popular work industries.

Figure 3
Top Five Employment Sector

Industry	Employed (16 and Over)
Male	
Educational Services	1,289
Retail Trade	1,281
Manufacturing	1,221
Public Administration	1,055
Construction	852
Female	
Health Care and Social Assistance	2,663
Educational Services	1,534
Retail Trade	1,257
Public Administration	1,087
Accommodation and Food Services	771

Source: U.S. Census Bureau

HOUSING PROFILE

The type, size, composition, condition, and cost of Troy’s households must be taken into consideration in developing housing goals for a five-year period. Knowledge of housing patterns within the City allows for a comprehensive strategy for addressing needs. Housing information collected enables the City to evaluate the type and condition of the City’s current housing stock and the number and type of families or individuals in need of housing assistance. Data gathered will assist in identifying proper housing services that should be provided to sustain affordable housing and to address housing needs for all income levels and categories of persons affected.

Household Tenure

Troy’s housing tenure is based off the total occupied housing units of 19,996.

- 40% of Troy’s housing units are owner-occupied at 8,015.

- The majority of owner-occupied households are two-person households at 36%.
- 60% are renter-occupied at 11,981.
 - At 43%, one-person households make up the largest portion of renter-occupied units.

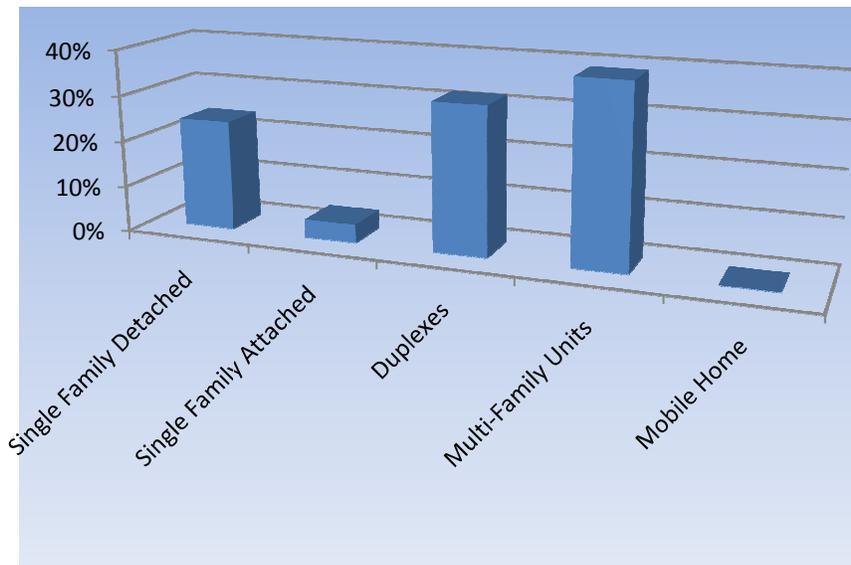
Household Type

The type of housing structures in the City of Troy vary and do not seem to be weighed significantly towards one type of housing. Multi-family units account for the majority of housing in Troy while single-family attached housing remains at a small percentage (refer to *Figure 4*).

- 24% - Single-family detached.
- 4% - Single-family attached.
- 32% - Duplexes.
- 39% - Multi-family units.
- <1% - Mobile Home.

Figure 4

Household Type



Large Households

A large household is considered to have five or more people residing in the unit. Statistics regarding large households can assist with determining types of housing needed in the City of Troy.

- 7% of the total number of occupied housing units in Troy, contain five or more persons.
- 50% of large households own their homes and 50% rent.
- 30% of owner-occupied units have three or more bedrooms.
- 19% of renter-occupied units have three or more bedrooms.

Single Parent Households

Single parent households refer to family households where either a male householder has no wife present or a female householder has no husband present.

- 14% of Troy's occupied households are single parent households with their own children under the age of 18.
- 79% of single parent households are female-headed households.
- 42% of female-headed households with their own children under 18 live at or below the poverty level.

Housing Vacancy

According to 2000 census data the City of Troy had a total of 23,093 housing units, of which 19,996 are occupied. The City's vacancy rate is 13% or 3,097 vacant housing units.

The American Community Survey 2005-2007 three-year estimates state that the number of housing units has slightly diminished since 2000, and with that, occupancy rates have decreased approximately 4%. As a result, vacancy rates since 2000 have increased to 17%. Decreasing occupancy rates and increasing vacancy rates demonstrates the struggles homebuyers and renters face in the current economy. The data provided by the census indicates that the decrease in housing has happened within the last few years and that the downturn of occupancy rates is likely a direct result of the recession and housing crisis being faced nationwide.

The City of Troy's housing trends are consistent with the State of New York as a whole. Though the total number of housing units in New York State increased since 2000 from 7,679,307 to 7,905,969, according to the ACS, occupancy rates decreased 2%.

Housing Age and Condition

The median year that housing structures were built in Troy, as stated by the U.S. Census Bureau, is 1940.

- 56% of Troy's housing stock was built in 1939 or earlier.
- 39% of Troy's housing structures were built between 1940 and 1990.
- 5% of the housing stock was built between 1990 and 2000.

Though the City's historic housing stock is an asset to the community and adds character attractive to visitors or new residents, the age of housing structures also adds to the amount of substandard housing conditions throughout the City. Many older homes are difficult and expensive to maintain resulting in the rising number of deteriorating homes in need of revitalization. Housing rehabilitation is a significant factor in maintaining the City's affordable housing stock. However, the cost of rehabilitating a home continues to rise due to high prices for material and labor. This makes it difficult to perform even standard maintenance to homes. If the home is considered a historical structure the cost of rehabilitation could be increased even more due to strict code regulations. The City's oldest housing stock is located in Lansingburgh, North Central, Downtown, and South Troy.

- < 1% of the City's housing stock lacks complete plumbing facilities.
- 1% of the City's total housing units lack complete kitchen facilities.

Housing Costs

As of 2000, the median value of a home in the City of Troy was \$85,100. The housing market has shifted considerably in almost a decade and despite the housing crisis being faced nationwide according to the ACS median home values in Troy increased to \$118,100. City-data.com reports that the median home or condo value rose again as of 2007 to \$141,919. These prices are still well below the State as a whole with the ACS 2005-2007 estimates indicating that the median home value in New York State is \$293,400. The median sale price of single-family homes in Rensselaer County was \$166,800 as of March 2009.

According to a Housing Market Analysis prepared by Saratoga Associates in 2008, monthly rents were found to be lower in the City of Troy, specifically in North Troy and Lansingburgh, in comparison with other communities in the Capital Region. According to the 2008 report, a three bedroom/one bath unit rented at approximately \$800 per month in the City of Troy. Though the City of Troy seems to have lower rental rates, the majority of housing within the City is urban multi-family dwellings. Comparable rentals in other communities renting at higher prices are likely to be suburban single-family homes.

Overcrowding

A household is considered to be overcrowded when the unit contains more than one occupant per room. The City of Troy demonstrates relatively low levels of overcrowding with owner-occupied housing experiencing less overcrowding than rental units. For owner-occupied housing there are no units that contain more than two occupants per room.

- Owner households <1%
- Renter households 3%

IV. FAIR HOUSING LEGAL STATUS

The City recognizes that reviewing and evaluating housing discrimination reports filed within Troy is imperative to identifying patterns or trends affecting fair housing opportunity. Several agencies are available in New York and Troy to either provide referrals or to receive housing complaints including the City of Troy’s Community Development Department, the New York State Division of Human Rights, and the New York State Division of Housing and Community Renewal’s Office of Fair Housing and Equal Opportunity.

To analyze potential impediments to fair housing choice, information was requested from the NYS Division of Housing and Community Renewal’s Fair Housing Office (DHCR) and the State of New York’s Division of Human Rights. The City requested and reviewed information on the number and types of complaints filed, involving the City of Troy, and alleging housing discrimination. DHCR indicated that for 2009, no fair housing complaints involving the City of Troy were reported.

The State of New York’s Division of Human Rights received a total of 19 fair housing complaints involving the City of Troy from 2005-2009. The majority of the complaints cited race/color as the basis with 12 reported incidents. Reports filed also involved 7 cases involving persons with disabilities, 4 involving familial status, 6 claiming discrimination based on sex, 4 on the basis of national origin, and 2 reports stating marital status as the basis for discrimination. Many reports cited more than one basis for discrimination. Reasonable accommodation was cited in 3 claims as the discriminatory practice, 6 cases cited terms or conditions of sale or rental, 6 cases cited refusal to rent, and 5 reports claimed eviction/threatened eviction as the discriminatory practice. The figure below demonstrates fair housing complaints received by the Division of Human Rights from 2005-2009.

*Figure 5
Fair Housing Complaints
New York State Division of Human Rights*

Practices Cited as Discriminatory			
Type of Discrimination	Conditions of Sale or Rental	Refusal to Rent	Reasonable Accommodation
Race/color	4	3	0
Sex	1	2	0
Religion	0	0	0
National Origin	1	2	0
Disability	3	2	3
Familial Status	0	2	0

**Some reports claimed more than one type of discrimination as the basis.*

**Source: New York State Division of Human Rights*

If an individual feels that they have been discriminated against in regards to the purchase or rental of housing, they may contact the State of New York's Division of Human Rights or the Division of Community Renewal's Office of Fair Housing and Equal Opportunity to file a formal complaint.

Further, if an individual feels that their housing rights have been violated and would like to make a complaint to the Department of Housing and Urban Development (HUD), they have one year from the date of occurrence to file a formal report. HUD will initiate an investigation and if it is determined that there is reasonable cause to believe discrimination has occurred the Secretary of HUD will charge the respondent with violating fair housing laws. Upon a formal charge being issued a HUD Administrative Law Judge (ALJ) will hear the case and issue an initial decision. In the event the parties involved elect to have their case heard in federal court the Department of Justice (DOJ) will commence a civil action.

Between 2005 and 2009 there have been no fair housing complaints involving the City of Troy where the Secretary of HUD has issued a charge against a respondent and no complaints required a decision by a HUD Administrative Law Judge.

V. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING

Public Sector

Public policies, practices, and procedures can directly affect housing choice making it imperative to review and evaluate possible actions or omissions in the public sector including public housing, community development, transportation, and community services.

Zoning and Site Selection

The City of Troy's "Zoning Code Ordinance" is outlined in Chapter 285 of the City's Municipal Code and was adopted in 1988 (Appendix A of the 1973 code).

Consistent with the goals and objectives of the City's Comprehensive Plan, the City has designed its zoning codes to foster the stabilization and improvement of existing neighborhoods and housing stock. The City recognizes housing as a high priority and the importance of encouraging the availability of a wide range of new housing opportunities for citizens of all income levels. The City's zoning code states the following housing objectives:

- To conserve existing, habitable dwellings through rehabilitation;
- To eliminate substandard housing principally through rehabilitation and allow for demolition only when no other alternatives are practically available;
- To provide for the enhancement of existing residential neighborhoods by encouraging land use policies and public investment which will protect the essential characteristics of those neighborhoods;
- To foster owner occupancy of housing units;
- To adopt regulations which provide sufficient off-street parking, open space, trash collection and removal, lighting and privacy to support both new and existing neighborhoods; and
- To adopt regulations which provide the City with sufficient flexibility to allow for new types of housing development in areas appropriate for said development.

The code defines 15 zoning districts of which six specifically allow multi-family housing. One district is specifically zoned for single-family use and one district allows two-family residential units. Figure 6

demonstrates the minimum lot area and minimum set back requirements for the six districts allowing multi-family housing.

*Figure 6
Districts Permitting Multi-Family Housing*

District	Minimum Lot Requirements	Minimum Yard Requirements		
	Lot Area (SF)	Front	Rear	Side
R-3 Multiple-Family Residential	2,500	15	20	10
R-4 Urban Neighborhood Residential	1,000	10	20	10
R-5 High-Rise Residential	-	10	40	10
P - Planned Development	2,500	25	20	10
B-4 Central Commercial	-	-	20	-
INST – Institutional	8,000	30	90	10

**Source: City of Troy zoning ordinance*

For housing to be affordable, it must often be developed at higher densities. District R-5 “High-Rise Residential” is designed to accommodate construction of high-rise, high density residential buildings promoting opportunities to increase affordable housing in the City of Troy.

The “Planned Development” district is specifically designed to maximize choice in the types of environment, housing, densities, occupancy tenure, lot sizes, community facilities, usable open space and recreational areas within a large parcel of land in which a planned mix of residential uses is proposed. This district is intended to foster a creative and efficient use of land.

Providing necessary services accessible to residential neighborhoods is important to providing fair housing. The “Institutional” district ensures the orderly continued development of health-related, educational, and community service agencies in a manner that is complementary to existing neighborhoods.

A review of the City’s zoning codes indicate that current zoning regulations are flexible in allowing a wide range of densities and housing types to provide more fair housing opportunities.

Community Revitalization and Municipal Services

Neighborhood revitalization efforts and the provision of municipal services are imperative to housing choice. The City funds and implements various programs with a focus on neighborhood preservation and the provision of public services. In an effort to support suitable living environments and ensure neighborhood livability, the City continues to implement various code enforcement programs and undertake demolition activities to eliminate hazardous structures in Troy neighborhoods. The City offers a variety of public service programs providing assistance to many low-income residents. Public service activities include homeless services, youth services, adult and family assistance, services for domestic violence victims, poverty services, and services for persons with HIV/AIDS.

In addition, the City's Public Works Department assists in maintaining neighborhood livability. The Public Works Department consists of five bureaus responsible for repairing roads, plowing snow, maintaining city buildings and vehicles, installing traffic devices, and picking up city refuse. City bureaus under the Public Works Department include the Bureau of Streets, the Bureau of Sanitation, Bureau of Traffic Control, the Bureau of Central Garage, and the Bureau of Facilities Maintenance.

The City also has 3 municipal parks citywide and 19 neighborhood parks that are available and accessible to all residents at all income-levels. The Bureau of Parks and Recreation is responsible for the maintenance and improvement of the parks and their facilities.

Review of public service programs offered in the City of Troy does not reveal any apparent impediments in the quality of services provided.

Employment, Transportation, and Housing

Identifying the relationship between major employers and transportation accessibility can be vital to housing choice. According to the City's 2003 Comprehensive Plan, major employers in the City of Troy include Seton Health, Northeast Health, Rensselaer Polytechnic Institute (RPI), The Sage Colleges, Hudson Valley Community College (HVCC), and the Troy City School District. According to City-Data.com, there are 8,096 workers who live and work in the City of Troy. There is a daytime population change due to commuting of approximately + 1,365 or +2.8%.

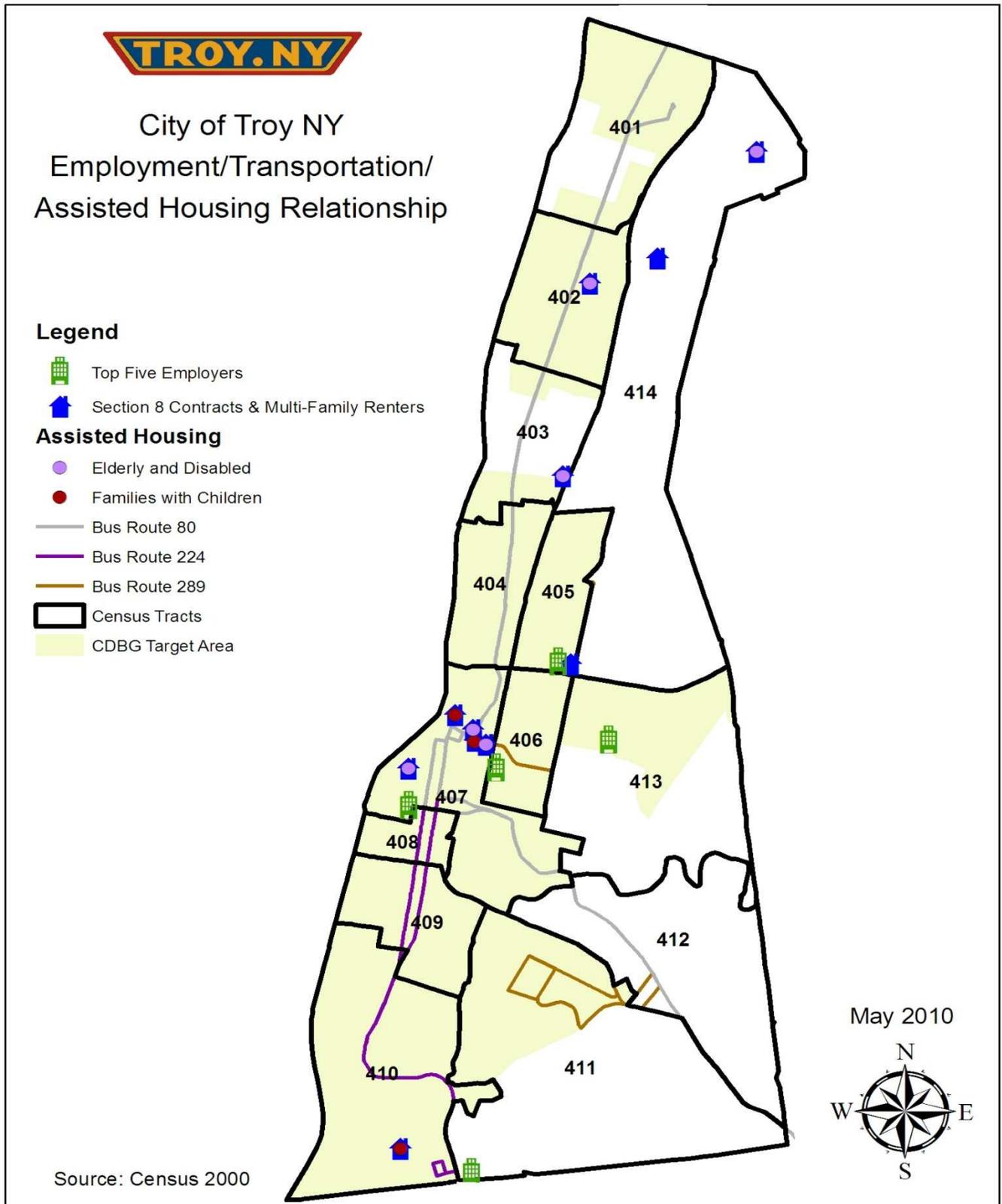
The Albany-Rensselaer train station is located within 8 miles from Troy and is currently served by Amtrak. Public transportation by bus is provided through the Capital District Transportation Authority (CDTA). CDTA provides approximately 16 routes serving the Troy area. These routes provide transportation locally and also provide access to the surrounding capital region. Transportation is provided by bus and also smaller shuttles. The City of Troy is also one of the most walkable cities in the Capital Region.

Troy does offer public and assisted housing locations with access to the rail station hub by the operating bus routes. The City recognizes the need for a good relationship between affordable housing, transportation, and its major employers and will continue efforts to promote fair housing choice for lower income groups by examining and considering the restructuring of routes based on demographic

changes, new service standards, and funding opportunities. According to the City's 2003 Comprehensive Plan, CDTA was developing a project to include a transfer center in the central business district.

Figure 7 below shows the employment, transportation, and assisted housing linkage in Troy.

Figure 7



Public Housing Policies

The Troy Housing Authority is the lead agency managing and administering public housing in the City of Troy. The Troy Housing Authority takes both a centralized and site-based approach to managing and operating the public housing properties within the City's inventory. The management approach was developed after a thorough analysis of all properties and operations and has resulted in a positive cash flow of two million dollars in 2008. The comprehensive list below demonstrates how the housing authority achieves its goals:

- Maintaining occupancy between 98% and 100% for all properties;
- Taking pro-active steps to help tenants improve their income and thereby increase their rental payments;
- Reducing tenant account receivables to between 0.5% and 3.8%;
- Reducing unit turnaround to approximately 20 days;
- Aggressively decreasing utility consumption;
- Completing all emergency work orders within 24 hours;
- Decreasing the number of arrests by Public Safety Officers by 50%; and
- Receiving an overall score of 9 out of 10 on the most recent Resident Assessment and Satisfaction Survey.

The Troy Housing Authority manages and operates 1,273 public housing apartments, 134 Section 8 apartments and 791 Tenant Based Section 8 Vouchers. The housing authority also administers 103 Shelter Plus Care Vouchers in conjunction with Joseph's House, Unity House, and Catholic Charities and 30 Section 8 Moderate Rehabilitation Vouchers in conjunction with the Troy YWCA.

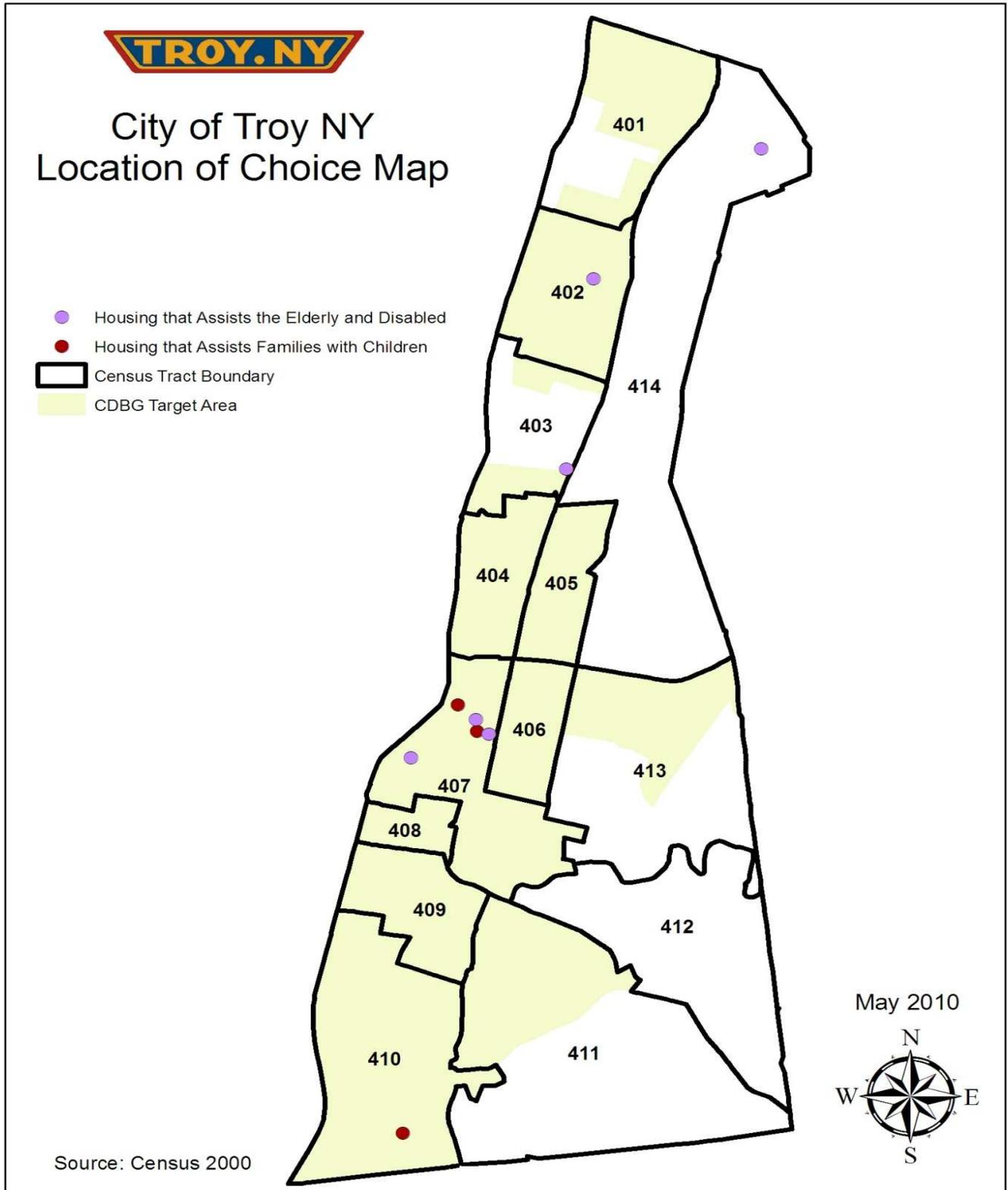
The Troy Housing Authority has 923 applicants on the public housing waiting list, including 11 disabled and 135 applicants on the Kennedy Towers waiting list, apartments for seniors.

The housing authority manages ten public housing sites ranging in size from 24 units to 390 units. These developments were built between 1950 and 1983, typically in areas of the city that were undesirable for development due to their challenging location and/or terrain. This indicates that though the developments may need minor rehabilitation housing units are in good condition. Maintenance personnel are assigned to each site to assist in the care of the buildings and housing units.

The Troy Housing Authority also provides Section 8 housing assistance. The purpose of the Housing Choice Voucher Program is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination.

Figure 8 shows assisted housing in Troy that rents to families with children, disabled persons, and the elderly.

Figure 8



Displacement

In accordance with the Department of Housing and Urban Development (HUD) regulations at 24 CFR 42.325 and with Section 104(d) of the Housing and Community Development Act of 1974 (HCD Act of 1974), as amended. The City encourages compliance with all federal regulations governing anti-displacement and relocation assistance.

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act (1974), the City of Troy will take steps to minimize the direct and indirect displacement of persons from their homes.

Chapter 51, Article II of the municipal code also encourages that in the case of displacement and relocation, fair housing shall be taken into consideration. The code states “the City Council declares it to be the public policy of the City to require that every department or other agency of the City which may be involved in any public construction program which could involve the removal of persons from their present housing accommodations and their relocation elsewhere, or which endeavor to implement any public or publicly assisted or public-approved housing or relocation plan, promote the elimination of segregation in housing within the City”.

Tax Policies

The City of Troy’s property tax policies are found in Chapter 257 of the municipal codes. According to Article IV, Senior Citizens Exemptions, Section 257-11 provides tax relief for property owned by one or more persons, each of whom is 65 years of age or older or will become 65 years of age on or before December 31 of the same year of the appropriate taxable status date; or owned by husband and wife, one of whom is 65 years of age or older or will become 65 years of age before December 31 of the same year of the appropriate taxable status date. This assists in providing affordable housing opportunities to elderly persons of low-and moderate-income.

Article VI, Exemptions for Residential Improvements for Disabled or Blind Persons, provides that any improvement made for the purpose of facilitating and accommodating the use and accessibility of the property by a resident owner of the property who is physically disabled or by a member of the resident owner’s household who is physically disabled shall receive tax relief. This article encourages accessibility in housing which is often overlooked and impedes fair housing efforts.

Article X, Home Improvement Exemption, encourages maintaining Troy’s housing stock by providing tax exemptions to residential buildings of not more than two families, that is reconstructed, altered, or improved. The residence shall be exempt from taxation levied by the City of Troy on the increase in assessed value attributable to such reconstruction, alteration, or improvement. The length of exemption is eight years.

In 2008, the City amended its code to add Attachment 1 to Chapter 258, Tax Exemption for First-Time Homebuyers of Newly Constructed Homes. This article promotes homeownership opportunities within the City of Troy by providing first-time homeowners tax relief for a period up to five years.

Boards and Commissions

The City of Troy has numerous boards and commissions that meet monthly. The Mayor and City Council encourage citizens to attend any public hearings.

Community Development Advisory Board

Chapter 19 of the City's municipal codes establishes a Community Development Advisory Board consisting of 10 members responsible for ensuring citizen participation throughout the community development process. This board keeps the public and council informed regarding the status of community development projects, it provides additional citizen recommendations on approved projects, and also may receive financial reports on community development monies spent.

Community Relations Committee

Consisting of 12 members, the Community Relations Committee was established with the purpose of serving as a means to stimulate mutual areas of interest and cooperation by the City and its major institutions and the business community. The committee is also responsible for a continuing dialogue between the colleges and universities, the business community, and the Council and City administration. The committee serves as a catalyst to establishing a formal procedure for exchanging suggestions regarding mutual areas of interest affecting the community.

Commission on Human Rights

The Commission on Human Rights was established in Chapter 51 with the purpose of:

- Working with federal, state and county agencies in developing courses of instruction for presentation in public and private schools, public libraries and other suitable places on techniques for achieving harmonious intergroup relations within the City;
- Enlisting the cooperation of the various racial, religious, ethnic and age groups, community organizations, labor organizations, fraternal and benevolent associations and other groups in the City in programs and campaigns devoted to eliminating group prejudice, intolerance, bigotry and discrimination;
- Studying the problems of prejudice, intolerance, bigotry, discrimination and disorder occasioned thereby in all or any field of human relationship;
- Receiving and investigating complaints and initiating its own investigations of allegations of tensions, prejudice, intolerance, bigotry and disorder based on difference of race, religion, ethnic origin, sex, age, disability or marital status and of allegations of discrimination against any person or persons, organization or corporation, whether practiced by private persons, associations or corporations;

- Holding hearings, compelling the attendance of witnesses, administering oaths, taking the testimony of any person under oath and, in connection therewith, requiring the production of any evidence relating to any matter under investigation or in question before the Commission; and
- Issuing publications and reports of investigations and research designed to promote good will and minimize or eliminate prejudice, intolerance, bigotry, discrimination and disorder occasioned thereby.

Troy's Boards and Commissions, agencies, and associations were established in the best interest of residents and the overall review of such indicates that the Boards and Commissions in place provide adequate protection for Meriden citizens.

Building Code Compliance

Troy's permitting and building construction codes found in Chapter 141 are designed to protect the public safety and welfare of residents and the Housing and Property Maintenance Codes found in Chapter 176 upholds the idea of safe, clean, and sanitary housing.

The Bureau of Code Enforcement administers the city's building construction, permitting and housing inspection programs. The Bureau is responsible for the enforcement of all state and local codes as well as the city's zoning ordinance. The Bureau of Code Enforcement issues building permits, Conducts construction and housing inspections, vacant building inspections and issues certificates of occupancy and compliance.

The Bureau's housing inspection program follows up on housing complaints and agency requests to assure that housing units are in compliance with the City of Troy Minimum Housing Standards Code. Areas covered include space, light and ventilation, electric, plumbing, heating systems, exiting and sanitary conditions.

The Bureau of Code Enforcement also oversees the landlord registry and the City hotline established for anonymous callers to report code issues.

Accessibility

As of March 6, 1991, the Department of Housing and Urban Development (HUD) adopted Fair Housing Accessibility Guidelines to provide builders and developers with technical guidance on how to comply with the specific accessibility requirements of the Fair Housing Amendments Act of 1988.

The Office Fair Housing and Equal Opportunity, under the Division of Housing and Community Renewal, provides information to advance the cause of equal rights for persons with disabilities and their families including a link to HUD's accessibility guidelines, access to the Fair Housing Act, and Section 504 information. These informational pieces provide educational information on accessibility requirements and how to include accessibility standards into the planning and design process.

The Independent Living Center, located in Troy, provides various services to persons with disabilities including advocacy, peer counseling, benefits advisement, information and referral, housing information, consultation on architectural barriers, transportation, living skills, employment services, and personal assistance services.

Chapter 141 Article II establishes minimum property standards for grant programs and encourages property owners to provide facilities to enhance the accessibility and use of premises by handicapped persons. Such facilities include but are not limited to ramps, adequate door widths, railings, etc.

For persons with disabilities, accessibility means more than just an accessible entrance to a structure. Accessibility encompasses interiors and exteriors of buildings as well as accessible routes, streets, and sidewalks. Chapter 251 of the City's code prohibits the obstruction of streets and sidewalks. This ordinance helps to assist persons with disabilities. Chapter 251 also requires that sidewalks are kept in good repair.

Private Sector

Lending policies and procedures can have a significant impact on fair housing choice. It is critical for potential homeowners and current homeowners looking to refinance or rehabilitate their home to have access to affordable and non-discriminatory financing.

The Home Mortgage Disclosure Act (HMDA), enacted by Congress in 1975, is implemented by the Federal Reserve Board's Regulation C. The regulations apply to certain financial institutions including banks, savings associations, credit unions, and other mortgage lending institutions. HMDA information is collected from public lending institutions and discloses public loan data used to:

- Determine if financial institutions are serving community housing needs;
- Assist public officials with public sector investment to help attract private investment to areas of need; and
- Identify possible discriminatory lending patterns and enforce anti-discrimination statutes.

The HMDA requires lenders to disclose home mortgage and home improvement lending transactions. Data collected for Meriden was analyzed and the table below consists of the aggregate disposition of loan applications by location of property and type of loan. Categories of information collected include FHA, FSA/RHS & VA, conventional, refinancing, home improvement loans, and loans on dwellings for five or more families. Figure 9 demonstrates aggregate mortgage loan applications for Troy in 2007. Appendix C includes the data tables used to calculate the information in this section by census tract for Troy.

*Figure 9
HMDA Aggregate Loan Applications for Troy*

	FHA, FSA/RHS&VA		Conventional		Refinancing		Home Improvement		Loans on Dwellings for 5 or more families	
	#	Avg Value	#	Avg Value	#	Avg Value	#	Avg Value	#	Avg value
Loans Originated	90	133,578	420	114,674	417	109,763	153	49,706	8	275,125
Approved, Not Accepted	5	139,200	94	99,277	103	106,175	33	29,424	0	-
Applications Denied	7	117,000	167	100,060	444	106,849	187	41,193	4	238,000
Applications Withdrawn	10	121,700	71	104,366	168	114,756	34	76,765	2	1,310,000
Files Closed for Incompleteness	4	95,750	33	131,909	43	126,395	8	78,375	0	-

**Source: Home Mortgage Disclosure Act (HMDA) via City-Data.com*

In 2007, there were 5 loans with an average value of \$139,200 that were approved but not accepted through FHA, FSA/RHS & VA.

There were a total of 420 conventional loans originated with an average value of \$114,674. Of the conventional loans, 94 were approved but not accepted, 167 were denied, 71 applications were withdrawn, and 33 were closed for incompleteness.

Refinancing loans originated totaled 417 with an average value of \$109,763. Refinancing loans approved and not accepted totaled 103, 444 applications were denied, 168 applications were withdrawn, and 43 were closed for incompleteness.

Home improvement loans originated totaled 153 with an average value of \$49,706. There were 33 loans approved but not accepted, 187 denied, 34 withdrawn, and 8 closed for incompleteness.

Loans originated for dwellings for five or more families totaled 8 with an average value of \$275,125. Applications denied total 4, and 2 were withdrawn.

Review of the above data reveals that for all categories the percentage of loans denied is higher than for loans approved. The recent changes in loan products, the foreclosure crisis nationwide, effects of subprime lending, and the housing market in 2007 are probable causes for the higher percentage of loan denials.

Figure 10 below demonstrates home purchase, home improvement, and refinancing loan applications by race and income for the entire Albany-Schenectady-Troy MSA/MD. Applications that were denied were largely due to debt to income ratio or credit history.

*Figure 10
Home Purchase/Home Improvement/Refinancing Loan
Applications by Race and Income
Albany-Schenectady-Troy MSA/MD*

	Applications Received	Loans Originated	Approved but not Accepted	Denied	Withdrawn	Closed for Incompleteness
Asian	-	-	-	-	-	-
African American	11	3	1	7	-	-
Hispanic	7	1	2	3	-	1
>50 of MSA/MD Median	339	94	36	188	14	7

The Private Mortgage Insurance Companies (PMIC) also compiles data on the disposition of applications for mortgage insurance from eight major private mortgage insurance companies.

Figure 11 demonstrates mortgage insurance loan applications in Troy from private mortgage insurance companies for 2007.

*Figure 11
PMIC Aggregate Insurance Loan
Applications for Troy*

	Conventional		Refinancing		Loans on Dwellings for 5 or more families	
	#	Avg Value	#	Avg Value	#	Avg Value
Loans Insured	123	135,390	38	141,632	30	118,833
Approved, Not Accepted	26	108,731	12	141,167	6	109,667
Applications Denied	5	110,600	-	-	2	114,000
Applications Withdrawn	7	143,429	4	126,750	2	99,000
Files Closed for Incompleteness	1	118,000	-	-	-	-

**Source: Private Mortgage Insurance Corporations data (PMIC) via City-Data.com*

In 2008, there were a total of 123 conventional loan applications that were insured with an average value of \$135,390, 26 were approved but not accepted, 5 were denied, 7 were withdrawn, and 1 was closed for incompleteness.

There were 38 refinancing loans insured with an average value of \$141,632. Of the total refinancing insurance loan applications 12 were approved but not accepted, and 4 were withdrawn.

There were 30 loans insured for dwellings for 5 or more families, 6 were approved but not accepted, 2 applications were denied, and 2 applications were withdrawn.

For the Albany-Schenectady-Troy MSA/MD, no applicants for conventional or refinancing loan insurance were of the Asian, African American, or Hispanic race/ethnicity and no applicant incomes were less than 50% of the MSA/MD median.

Real Estate Market Factors

Consistent with national statistics, housing affordability in the State of New York continues to be a problem. Various factors can affect the cost of housing including the demand for a specific location, availability of buildable land, and labor and material costs. Others factors that can affect the lack of affordable housing include interest rates, job growth, and local economic conditions.

As of 2000, the median value of a home in the City of Troy was \$85,100. The housing market has shifted considerably in almost a decade and despite the housing crisis being faced nationwide according to the ACS median home values in Troy increased to \$118,100. City-data.com reports that the median home or condo value rose again as of 2007 to \$141,919. These prices are still well below the State as a whole with the ACS 2005-2007 estimates indicating that the median home value in New York State is \$293,400. The median sale price of single-family homes in Rensselaer County was \$166,800 as of March 2009.

According to a Housing Market Analysis prepared by Saratoga Associates in 2008, monthly rents were found to be lower in the City of Troy, specifically in North Troy and Lansingburgh, in comparison with other communities in the Capital Region. According to the 2008 report, a three bedroom/one bath unit rented at approximately \$800 per month in the City of Troy. Though the City of Troy seems to have lower rental rates, the majority of housing within the City is urban multi-family dwellings. Comparable rentals in other communities renting at higher prices are likely to be suburban single-family homes.

Reports provided by the Greater Capital Association of Realtors, Inc. demonstrates a trend of declining sales of single-family homes throughout Rensselaer County from 2007-2009. The county experienced a 6% decrease in home sales from 2007 to 2008 and a 29% decrease from 2008 to 2009. In early 2009, Rensselaer County reported 525 new listings of which 222 total residential sales were made. The median sale price was \$160,000.

The number of sales made compared with the number of homes listed indicates that the local real estate market has softened and Rensselaer County is experiencing the same local trends suffered nationwide. Rensselaer County and surrounding cities, including the City of Troy, face a very challenging market. The excess of supply over the demand results in home values and sale prices continuing to go down while the amount of homes on the market continues to increase. Typically, these circumstances would be desirable for potential homeowners looking to purchase affordable housing. However, the foreclosure crisis resulting from sub-prime lending practices have resulted in banking institutions redefining their loan products. Loan terms have been changed and down-payment assistance has decreased making it difficult for low income individuals to qualify for financing. If the applicant does qualify for financing, many times they cannot afford the down-payment requirements and therefore do not follow through with the loan process.

Affordable housing and homeownership opportunities are imperative to the sustainability of a community. The City of Troy continues to encourage the rehabilitation of its current housing stock to help address affordable housing needs and also offers programs to assist first-time homebuyers even as the current market continues to be a challenging factor in providing affordable housing and homeownership opportunities to low-and moderate-income families and individuals.

Access to decent, safe, and affordable housing is very important to neighborhood livability. Affordable housing is essential to sustaining a suitable living environment and to the vitality of a neighborhood. Affordability of housing is defined as the cost of housing not exceeding 30% of the gross household income. Below demonstrates housing affordability for the City of Troy based upon annual income for all

income categories including very low-income, low-income, moderate-income, and above moderate-income.

*Figure 12
Housing Affordability by Income Category*

Income Category	Annual Income*	Maximum Affordable Home Mortgage**	Maximum Affordable Monthly Rent***
Very Low-Income (<50%)	\$14,922	\$44,766	\$373
Low-Income (51%-80%)	\$14,923 - \$23,875	\$71,625	\$597
Moderate-Income (81%-120%)	\$23,876 - \$35,812	\$107,436	\$895
Above Moderate-Income (121% +)	\$35,813+	\$107,439+	\$895+

Source: 2000 Census

*Annual income figures determined using the 2000 median household income.

**Maximum affordable mortgage price is typically considered to be three (3) times a household's annual income.

***Maximum affordable rent is thirty (30) percent of a household's monthly income.

The current market has affected the economy in many ways across the nation and people are being faced with the struggles of owning a home or buying a home as a result. Lending institutions are changing their policies and re-designing lending programs, making it much harder for potential buyers to get financed. Confidence amongst lenders has plummeted and needs to be increased encouraging them to lend to one another again. Credit struggles have impacted mortgages in several ways including:

- More strict lending conditions;
- Increased interest rates;
- Increased deposit requirements;
- Decrease in mortgage products;
- Increase in arrangement fees; and
- Decreased mortgage lending approvals.

Lenders are being very cautious regarding who they will lend to and about taking in new business. Many people cannot get financed because they cannot meet the new strict requirements or eligibility criteria. Even if potential applicants meet the eligibility requirements of the lending institution, high interest rates make it very difficult for homeowners to get an affordable mortgage payment. Many lenders are

also asking for a 10% deposit instead of the typical 5% which is also making it near impossible for first-time homebuyers who have no savings or previous property to take equity from to get a loan.

Mortgage products available have also dropped by two thirds percent. This is limiting the choices that consumers have and limiting the chances for consumers to get a mortgage. Many lenders have eliminated important mortgage products such as the 125% and 100% mortgages as well. A combination of tighter lending policies, lack of confidence in buyers, and high housing prices have decreased the mortgage lending levels.

Due to declining value of homes in certain markets, both Fannie Mae and Freddie Mac have announced changes regarding maximum loan levels and that Fannie Mae will be subject to declining market guidelines. Effective January 15, 2008 Fannie Mae implemented a policy to restrict the maximum loan to value ratio and combined loan to value ratio for properties located within a declining market to 5% points less than the maximum permitted for the selected loan product. This means that if an appraiser indicates that the property is located in a declining market, than the buyer may be required to put an additional 5% down.

FHA and VA loans have not changed guidelines significantly like others making the opportunity for 100% financing still available. Both FHA and VA ask for specific details in the appraisal on whether the property is in a declining market or not, but neither program has indicated that they will force the borrower to put more money down.

FHA mortgage rules have changed as well with HUD's Letter 2008-25. This is in response to "walking buyers" who could not sell their homes because they were upside down on the loan. The homeowner would buy an affordable home and rent it, helping them to qualify for a new home. The old home would then go into foreclosure. FHA has changed this so now there are only certain circumstances where rental income can be used to qualify including:

- The homebuyer must be moving to a new city;
- The new home must be outside reasonable commuting distance from the old home;
- The old home must be leased for at least a year;
- The homebuyer must document the receipt of the security deposit;
- The existing home must have a 25% equity position.

FHA also extended financing for immediate purchase of foreclosed homes in June of 2008. Because of declining home values a policy was implemented that would extend government-backed mortgage insurance and allow for immediate sale of foreclosed properties. Properties will no longer be subject to 90 day waiting periods.

In July of 2008, the USDA Rural Housing lending program was implemented and designed to help low- and moderate-income families purchase homes in rural communities. Some of the benefits of this

program include providing 102% LTV financing, available to low-and moderate-income families, no requirement to be a first-time homebuyer, lesser down payment requirements than conventional or FHA loans, no monthly mortgage insurance required; and 30 year fixed rate loans.

The federal homeowner stimulus plan has also been implemented with the purpose of allowing 4-5 million homeowners to refinance mortgages, reducing homeowner's monthly mortgage payments, assisting renters and homeowners displaced or facing foreclosure, and increasing the allowable mortgage backed securities through Fannie Mae and Freddie Mac.

The Housing and Economic Recovery Act (HERA) was signed into law July 30, 2008. HERA appropriates \$3.9 billion in emergency CDBG funding to assist with the foreclosure crisis facing our nation and to help further efforts to stabilize neighborhoods with high foreclosure rates and a significant amount of vacant homes. HERA funds are being distributed through the Neighborhood Stabilization Program (NSP) and the grants are to be considered CDBG funds. Allocations are being made to communities through a formula allocation process determined by HUD. The NSP will be administered by HUD's Office of Block Grant Assistant, within the Office of Community Planning and Development.

In conclusion, many changes have taken place with traditional loan products and guidelines and lending criteria have become much more strict. Interest rates and down payment expectations continue to rise making it hard for potential borrowers to get financing or achieve an affordable mortgage payment. The current credit and market struggles have greatly affected loan products throughout the nation.

Subprime Lending

A rapid increase in subprime lending posed a serious threat to Troy's housing market. Subprime loans being disproportionately provided to low-and moderate-income neighborhoods can affect the financial stability of a community. Subprime loans characteristically have high interest-only payments or adjustable interest rates, which are attractive to homebuyers but lead to payments that are unaffordable for many borrowers. Subprime borrowers tend to end up paying substantially more for their loans than prime borrowers due to higher and adjustable interest rates.

Subprime lending is responsible for the foreclosure crisis nationwide negatively affecting many low-to moderate-income households and neighborhoods. Due to significant subprime lending to low-and moderate-income households, foreclosures increased and homes could not be resold due to the downturn in the for-sale market, leaving homes in low-income neighborhoods abandoned. This also affects the City's property tax revenue and increases the potential for code problems.

TRIP also provides foreclosure mitigation counseling. In 2006, TRIP successfully negotiated a workout for 80% of those who came to TRIP seeking mitigation counseling. In 2007, that figured dropped to 69% as homeowners waited longer to seek help. In 2008, TRIP proposed announcing efforts to get homeowners looking at and understanding their mortgages before there is a problem. TRIP will also continue to tap into the lessons learned in areas hard hit by crisis, advocate for resources and programs on the state and national level that can help locally, and rely on the expertise and resources of local lending partners who are helping to find a local solution.

Public and Private Sector

Fair Housing Enforcement

The City of Troy is actively involved in enforcing fair housing through its various programs, public policies, and through fair housing organizations including non-profit organizations.

The Troy Rehabilitation and Improvement Program, Inc. (TRIP) is a local non-profit dedicated to fostering the development of Troy as a dynamic city providing a variety of housing choices and accommodating a diverse population. TRIP's mission is to enable individuals and families to live in desirable, sustainable neighborhoods by providing opportunities for people to access decent, safe, and affordable housing.

According to the most recent annual report in 2007, TRIP achieved many accomplishments in providing fair housing opportunities including upgrading many rental units, training 144 landlords on responsible rental management practices, and hiring extra security for neighborhoods in which TRIP properties are located. TRIP's homeownership activities for 2007 included providing homebuyer or financial counseling to 476 individuals, 163 individuals attended homebuyer orientations, 112 people graduated from TRIP's homebuyer clubs, 59 families became first-time homebuyers, and 39 homeowners in foreclosure were assisted.

TRIP has also formed an alliance with Rensselaer County Housing Resources to provide better housing services throughout the county. Through the home repair programs offered, in 2007 294 individuals received home repair assistance improving the physical condition of their home. Many beneficiaries of home repair assistance were elderly homeowners and 4 were physically disabled. Providing home maintenance assistance enables physically challenged people to remain in their homes. Homeownership programs provided such as financial counseling also assisted 50 individuals in resolving credit issues providing increased opportunities of being first-time homebuyers.

The City of Troy's Community Development Department enforces fair housing by referring discrimination complaints to appropriate agencies, including TRIP, to be resolved.

The City also enforces fair housing through its Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs. Through the CDBG and HOME programs, the City is required to affirmatively further fair housing and is actively involved in the preparation of an updated Analysis of Impediments to Fair Housing Choice (AI). The City collaborates with various public service organizations throughout Troy to assure that any discriminatory housing practices are eliminated including TRIP, the Independent Living Center, and the Troy Housing Authority.

To ensure additional enforcement of fair housing laws, Chapter 51 Article II of the City of Troy's codes and regulations is dedicated to Fair Housing. The purpose of the chapter is to affirmatively further fair housing and equal opportunity for all Troy residents. The code states "in the City, with its population consisting of people of various races, creeds, colors, national origins, sex, age, disability or marital status, there is no greater danger to the health, morals, safety and welfare of the City and its inhabitants

than the existence of groups and individuals reflecting prejudice against one another and antagonistic to each other because of differences of race, creed, color, national origin, sex, age, disability or marital status. Many persons have been compelled to live in circumscribed sections under substandard, unhealthful, unsanitary and crowded living conditions because of discrimination and segregation in housing. The City Council hereby finds and declares that acts of prejudice, intolerance, bigotry and discrimination which deny a person the opportunity to sell, purchase, lease, rent or obtain financing for the purchase or lease of housing accommodations because of race, creed, color, national origin, sex, age, disability or marital status threaten the fundamental rights and privileges of the inhabitants of the City and undermine the foundations of a free democratic state. The Council further declares it to be the public policy of the City to eliminate and prevent discrimination and segregation based on race, creed, color, national origin, sex, age, disability or marital status and to safeguard the right of every person to sell, purchase, lease, rent or obtain financing for the purchase or lease of housing accommodations without regard to race, creed, color, national origin, sex, age, disability or marital status”.

Additionally, to help enforce fair housing, the City had a housing market analysis conducted by Saratoga Associates in 2008. The City’s current policy direction encourages further homeownership opportunities and stable neighborhoods. A conservative five-year projection proposed that 812 new housing units could be absorbed by the City of Troy. Troy’s zoning codes are also designed to provide flexibility in creating additional affordable units.

Informational Programs

The Troy Rehabilitation and Improvement Program, Inc. (TRIP) provides housing opportunity through its various programs by helping people achieve homeownership, rent affordable apartments, and by working in partnership with neighborhood residents to create vibrant communities. From 2002-2005 TRIP provided financial counseling to 2,068 households, provided homebuyer education workshops to 449 people, prevented 102 people from losing their homes through foreclosure, and assisted 209 families achieve homeownership. TRIP has also trained 592 people in its landlord training program, developed a tenant training program for RPI students, and has supported a dozen neighborhood groups in the City of Troy.

Services provided by TRIP include:

- Pre-purchase education;
- Financial education;
- Home maintenance;
- Post-purchase education;
- Landlord training;

- Matched savings program; and
- Downpayment and closing costs assistance.

The City of Troy is also actively involved in providing information to the public. Through the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs the City is required to affirmatively further fair housing and must provide information regarding fair housing in its Five-Year Consolidated Plan and Annual Action Plan.

The NYS Division of Housing and Community Renewal's Fair Housing Office also has a Fair Housing Unit (FHU) that seeks to promote fair housing and equal housing opportunity by providing fair housing information and requiring awardees of capital program funding and tax credits to comply with State and Federal civil rights laws in the marketing of the low income housing they develop. FHU also provides technical assistance and training on civil rights issues to developers and DHCR employees involved at the regional level.

The NYS Division of Human Rights also offers information on fair housing through their webpage at www.dhr.state.ny.us. Information for the public includes a fair housing public service announcement that can be listened to and also a brochure on accessibility. The Division also provides information on knowing your fair housing rights, recent fair housing law, and how to file a complaint.

Visitability

The Independent Living Center, located in Troy, provides various services to persons with disabilities including advocacy, peer counseling, benefits advisement, information and referral, housing information, consultation on architectural barriers, transportation, living skills, employment services, and personal assistance services. The City of Troy is dedicated to collaborating with the Independent Living Center to provide funding to increase accessibility and initiate visitability studies to better understand and serve persons with disabilities.

The Office Fair Housing and Equal Opportunity, under the Division of Housing and Community Renewal, provides information to advance the cause of equal rights for persons with disabilities and their families including a link to HUD's accessibility guidelines, access to the Fair Housing Act, and Section 504 information. These informational pieces provide educational information on accessibility requirements and how to include accessibility standards into the planning and design process.

On January 1, 2008 a law took effect requiring places of public accommodation to take certain actions to assure that people with disabilities have access to their facilities, programs, and/ services. The NYS Division of Human Rights provides information including a pamphlet on reasonable accommodation in public accommodations outlining the law and providing guidance on visitability requirements.

VI. ASSESSMENT OF PROGRAMS AND ACTIVITIES

Community Development Block Grant (CDBG)

The Community Development Block Grant (CDBG) program is a versatile program providing communities with resources to address a wide range of community development needs. Created under Title I of the Housing and Community Development Act, CDBG funding has become a staple funding source for the City of Troy in addressing community revitalization, housing, and economic development needs. The CDBG program contains a regulatory requirement to affirmatively further fair housing based upon HUD's obligation under Section 808 of the Fair Housing Act. Grantees under the CDBG program must comply with this requirement and certify that it will further fair housing efforts. For the purpose of the CDBG program, HUD defines "affirmatively furthering fair housing" as requiring a grantee to:

- Conduct an analysis to identify impediments to fair housing choice within the jurisdiction;
- Take appropriate actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken in this regard.

The City of Troy previously conducted an Analysis of Impediments to Fair Housing (AI) in February 1995 and fair housing needs were updated as part of the 2005-2009 Consolidated Plan. This document will serve as the City's updated Analysis of Impediments in accordance with HUD regulation at 24 CFR 570.904(c)(1) for HUD CDBG Entitlement grantees. The City is committed to eliminating discriminatory practices in housing opportunities for all protected groups identified under fair housing laws. This Analysis of Impediments will coincide with the City's 2010-2014 Consolidated Plan, which includes the City's certification of compliance with fair housing requirements.

In furthering fair housing efforts, the City has established community development goals including:

- Improve and stabilize city neighborhoods specifically in identified target areas;
- Enhance and encourage resident involvement; and
- Promote safe neighborhoods.

The City of Troy continues to further fair housing efforts through its CDBG program by funding activities including code enforcement, housing rehabilitation, homeownership programs, and homeless services. The City is committed to providing benefits to the greatest number of people while targeting low-and moderate-income residents. The City will utilize its HOME and ESG programs to address housing and homeless needs. However, the City will largely utilize CDBG funds in its strategic approach to alleviate poverty through various community development activities focused on neighborhood revitalization. The

City will commit its CDBG funds towards programs and projects that focus on fixed tangible assets in the form of physical and social infrastructure improvements. Neighborhood infrastructure development that incorporates social design into physical improvements will change the neighborhood landscape and significantly improve the social connectedness of its residents. Community initiative is vital to revitalizing the health of a neighborhood, to the provision of a suitable living environment and economic sustainability for residents, and in promoting fair housing.

The following programs will be funded through the City's CDBG program.

Housing and Energy Improvement Program

The Housing and Energy Improvement program supports the preservation of Troy's existing housing stock by offering funds to assist in eliminating housing deficiencies and offering technical assistance to very low, low, and moderate income homeowners' of one and two unit households.

Code Enforcement

The City will assist in maintaining neighborhood stability through general code enforcement. Code officers work with police and the Department of Public Works to conduct interior/exterior inspections and support civil enforcement actions in low-and moderate-income neighborhoods.

Neighborhood Improvement through Code Enforcement Program (NICE)

The NICE program assists in bringing city households into compliance with city regulations through targeted unit inspections and code enforcement helps to eliminate hazardous conditions providing a suitable living environment.

Infrastructure Improvements

Infrastructure improvements are a high priority for Troy specifically within the target areas of South Troy and North Central Troy. The city expects to fund activities including street lighting, curbs, sidewalks improvements, trash receptacles, tree planting, handicapped curb cut outs, park and recreational improvements, and vacant building stabilization and demolition.

Demolition of Vacant Buildings

The City will eliminate slum and blight throughout the community and provide opportunities to construct new affordable housing or recreational parks by conducting emergency demolitions of vacant deteriorated buildings. The City will utilize a housing rehabilitation specialist to survey and inspect properties citywide and determine potential demolition sites.

HOME Investment Partnership (HOME) Program

Authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended, HOME funding is the largest federal block grant to state and local governments creating affordable housing opportunities. The program was designed to implement the following principals:

- Flexibility empowering people and communities to design and implement strategies tailored to their needs and priorities;
- Emphasize Consolidated Planning to expand and strengthen partnerships among all levels of government and the private sector in the development of affordable housing; and
- Provide technical assistance activities and set-asides for qualified community-based non-profit housing groups to build the capacity of these partners.

HOME funding can be used for a variety of housing activities including home purchase or rehabilitation financing assistance, the construction or rehabilitation of housing for rent or ownership, or for other reasonable expenses related to the development of housing such as site acquisition or improvement, demolition of dilapidated housing, and payment of relocation expenses. Participating Jurisdictions can use HOME funds to provide tenant-based rental assistance.

HOME recipients are required to affirmatively further fair housing and as part of the application process for HOME funding must sign an assurance committing the locality to:

- Maximizing choice within the community's total housing supply;
- Lessening racial, ethnic, and economic concentrations of housing;
- Facilitating desegregation and racially inclusive patterns of occupancy and use of public facilities; and
- Administering the HOME program in a manner to affirmatively further fair housing.

As a Participating Jurisdiction for HOME funds, the City receives HOME entitlement funds annually to be used to promote affordable housing. The City funds several housing programs through HOME funding designed to enhance the effectiveness of the City's housing goals for target-income residents. Housing goals include:

- Sustain existing housing stock through rehabilitation and necessary improvements;
- Increase the number of new affordable housing units;
- Increase homeownership opportunities;
- Rehabilitate/remove inhabitable vacant units;
- Alleviate overcrowding specifically in multi-family housing units.
- Strengthen institutional structure among public and private housing agencies; and
- Enhance interagency and departmental coordination making program process more efficient.

Below demonstrates housing programs funded through the City's HOME program.

Homebuyer's Incentive Program (HIP)

The Homebuyers Incentive Program continues to support homeownership by offering deferred payment loans to low income persons providing them with an opportunity to purchase one or two family homes. The property must remain affordable for a ten year period and the homebuyer must complete a Home Buyers' certification educational program.

Troy Homes

The Troy Homes program will provide affordable housing and assist in reducing the density of housing in the City of Troy. For the first phase of the program, the City will provide grant funding to Habitat for Humanity to develop affordable single-family housing. The second phase of the programs consists of the City partnering with the Troy Housing Development Corporation (THDC) to rehabilitate multi-family housing into affordable single-family units.

HOME CHDO Set-Aside Project Funds

The City of Troy will partner with local certified CHDO agencies to conduct scattered site housing rehabilitation or new infill residential construction projects. This program will assist in maintaining the City's current housing stock and bring homes up to code eliminating potential health hazards and expanding affordable housing opportunities.

Public Service Programs

The City is taking the best approach to revitalizing target areas to provide a suitable living environment and focusing on expanding economic opportunities. The City of Troy recognizes that education and employment is critical in reversing the trends of poverty and will support public service agencies providing daycare, after school programs, and educational opportunities for low-income working families that live and work in the City of Troy. The City is also confident that through its community revitalization efforts, low-income residents will receive the greatest benefit. The City offers many public service programs funded through local resources that will directly benefit low-income residents and provide the services needed.

The City of Troy provides the following services through its various public service programs:

- Homeless services;
- Youth services;
- Adult and family assistance;
- Services for domestic violence victims;

- Poverty services; and
- Service for persons with HIV/AIDS.

Economic Development Programs

Increasing economic opportunity is a key component to ensuring the viability of the City of Troy and in promoting fair housing. The City is dedicated to sustaining existing businesses while encouraging new business opportunities that promote job creation. Employment is fundamental to providing financial independence for families and individuals and in providing a stable economic environment for the City. The City established the following economic development goals:

- Promote the development of new businesses and the expansion of existing businesses.
- Provide economic opportunities for low –and moderate-income families through job training and adult education courses.

The City of Troy will promote economic development by focusing on commercial façade improvements and micro-enterprise efforts. Programs the City will fund include:

50/50 Matching Grant Program

The City will provide financial assistance to business owners for the purposes of stabilizing buildings, improving building exteriors, bringing primary and secondary entrances up to code, and site improvements to achieve exterior and interior code compliance. Handicapped accessibility to commercial buildings will be the priority of this program.

Pilot Micro-Enterprise Program

The City will encourage new business start-ups that will create employment opportunities through the micro-enterprise program by providing financial assistance in the form of low interest loans to eligible participants. Funding will be used to assist with start-up costs, façade improvements, job training, and financial counseling.

Troy Housing Authority

The City works very closely with the Troy Housing Authority in providing services for low-income public housing and Section 8 clients and to enhance planning for services. The City coordinates with the housing authority on evaluation of proposed and existing projects and for the implementation of the Public Housing Strategy included in the Consolidated Plan.

The Troy Housing Authority manages and operates 1,273 public housing apartments, 134 Section 8 apartments and 791 Tenant Based Section 8 Vouchers. The housing authority also administers 103 Shelter Plus Care Vouchers in conjunction with Joseph’s House, Unity House, and Catholic Charities and

30 Section 8 Moderate Rehabilitation Vouchers in conjunction with the Troy YWCA. *Figure 3-5* below identifies public and assisted housing in the City of Troy.

The Troy Housing Authority has 923 applicants on the public housing waiting list, including 11 disabled and 135 applicants on the Kennedy Towers waiting list, apartments for seniors.

The housing authority manages ten public housing sites ranging in size from 24 units to 390 units. These developments were built between 1950 and 1983, typically in areas of the city that were undesirable for development due to their challenging location and/or terrain. This indicates that though the developments may need minor rehabilitation housing units are in good condition. Maintenance personnel are assigned to each site to assist in the care of the buildings and housing units.

*Figure 13
Public Housing*

DEVELOPMENT	UNITS	SERVICES
<i>Corliss Park Apartments Off Northern Drive Troy, New York 12182</i>	184 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program; Lansingburgh Boys & Girls Club
<i>John P. Taylor Apartments Congress & River Streets Troy, New York 12180</i>	278 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program; On-site Laundry Facility
<i>Arnold E. Fallon Apartments Glen Avenue & President Street Troy, New York 12180</i>	40 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program; Weed & Seed Program Site; Connected Kids Site
<i>Catherine M. Sweeney Apartments Fourth & Trenton Streets Troy, New York 12180</i>	24 Family	Participates in services at Phelan Court
<i>Margaret W. Phelan Apartments Thompson & Hopkins Street Troy, New York 12180</i>	89 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program
<i>Martin Luther King Apartments Eddy's Lane Troy, New York 12180</i>	124 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program; Weed & Seed Program Site; Connected Kids Site
<i>Edward A. Kane Apartments 5 115th Street Troy, New York 12182</i>	60 Senior	Tenant-Run Activities; Summer Field Trip; Computer Resource Room; On-site Laundry Facility, Library & Community Room; Exercise Equipment
<i>Grand Street Apartments Fifth Avenue and Grand Street Troy, New York 12180</i>	42 Family	REACT, Inc. Food Pantry; Furniture Program and Offices

<i>Conway Court Apartments 12 Conway Court Troy, New York 12180</i>	41 Senior	Tenant-Run Activities; Summer Field Trip; On-site Laundry Facility & Community Room; Exercise Room
<i>Griswold Heights Apartments Madison & Spring Avenues Troy, New York 12180</i>	390 Family	Tenant Association Activities; Help With Homework Club; Summer Breakfast & Lunch Program; On-site Laundry Facility
<i>John F. Kennedy Towers Apartments 2100 Sixth Avenue Troy, New York 12180</i>	135 Senior	Tenant Association Activities; Resident Service Coordination via Eddy Home Care; Summer Field Trip; On-site Laundry Facility, Library & Community Room

**Source: Troy Housing Authority*

Working with the Troy Housing Authority, the City of Troy has developed a Community Housing Development Organization (CHDO) to encourage residents to become more involved and offer homeownership opportunities to Troy Housing Authority residents and low-income city residents. The responsibility of the CHDO will be to rehabilitate existing units or demolish and construct new housing units for residents that have completed the Troy Housing Authority’s self-sufficiency program or that are enrolled in the Homebuyer’s Incentive Program. The City, along with the housing authority, will continue to develop and evaluate the relationship with ADDI, Super NOFA, and other HUD funding sources to successfully carry out strategic plan goals and ensure all resources are being utilized in providing homeownership opportunities to public housing residents.

Section 8 Housing Choice Voucher Program

The Housing Choice Voucher Program provides vouchers to very low - and extremely low – income households that are in need of housing, are potentially at risk of being homeless, or have special needs. Rental assistance provides affordable housing opportunities which leads to families moving towards self-sufficiency.

The Housing Choice Voucher Program (Section 8) is administered by the Troy Housing Authority along with public and assisted housing. The housing authority manages 134 project-based section 8 apartments located in a Low Income Housing Tax Credit development and 791 Tenant Based Section 8 vouchers. There are 561 applicants on the Section 8 waiting list despite the capacity the housing authority has to provide rental assistance, indicating a demand for the Section 8 program and units.

Independent Living Center

The Independent Living Center is a non-profit organization in the City of Troy serving the needs of persons with disabilities where possible. Outreach and meetings with staff from the Independent Living Center identified crucial needs for the disabled living in Troy including:

- Educational outreach;
- Street improvements (specifically lighting and sidewalk improvements for mobility and to assist the visually impaired);

- Consistent maintenance of public facilities such as elevators and rehabilitation of public restrooms to ensure accessibility;
- Façade improvements of businesses to allow for access;
- Appropriate grading of ramps leading to doorways;
- Interior accessibility including appropriate counter heights;
- Accessible housing;
- Accessible routes to housing structures; and
- Collaboration between committees, public agencies, and the Independent Living Center.

The City promotes activities undertaken by the Independent Living Center and will provide funding when possible to address needs and promote accessibility and fair housing for persons with disabilities.

Adult Care Programs

The City of Troy is home to four adult care facilities as certified by the New York State Department of Health. These facilities offer approximately 343 beds for the elderly and frail elderly. Three of the facilities are adult homes with one also offering an assisted living program. One facility certifies as an enriched housing program. None of the facilities have an age restriction for residency however each has their own specific requirements to be eligible. Providing adult care facilities and services assists in providing fair housing opportunities for the elderly.

*Figure 14
Adult Care/Assisted Living*

Facility	Type	Beds	Age Restriction
Fawn Ridge Assisted Living	Adult Home	155	None
Heartwood Terrace	Adult Home/Assisted Living Program	86	None
Terrace at Eddy Memorial	Enriched Housing Program	69	None
Troy Adult Home	Adult Home	33	None.

Commission on Economic Opportunity

The Commission on Economic Opportunity for the Greater Capital Region (CEO) is an “umbrella” agency that provides the overall leadership, policy guidance, coordination, and support necessary to successfully deliver a wide range of services. The programs at CEO are designed to empower individuals and families to build self-sufficiency in all life areas and rise out of poverty. CEO provides various services including community services, early childhood services, and housing services.

Program Assessment Conclusion

The City of Troy is committed to furthering fair housing and continues to fund housing and neighborhood revitalization activities through its CDBG and HOME programs to assist in providing housing choice. Coordination with various state and local agencies has resulted in the ability to provide a vast array of programs and services to assist in meeting housing needs throughout the community. Though the City is dedicated to increasing fair housing, lack of available funding and scarce land to develop new housing can create barriers in providing housing choice. The City will continue to work in conjunction with private and public organizations to increase fair housing opportunities and review and re-evaluate current programs and activities consistently to ensure compliance in furthering fair housing efforts.

VII. CONCLUSIONS AND RECOMMENDATIONS

The Department of Housing and Urban Development (HUD) requires that all recipients that receive federal funds from the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) programs take actions to affirmatively further fair housing. This obligation includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction.

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 that restrict housing choice or the availability of housing choices.
- Any actions, omissions, or decisions that have the effect 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 City conducted a thorough review of current demographic data; all public sector laws, regulations, ordinances, and policies; private sector lending policies and practices; fair housing enforcement; informational programs; and visitability in Troy. The analysis also included an assessment of the jurisdiction's fair housing programs and activities. The City consulted with local and State housing organizations and also conducted a fair housing survey which provided valuable input. Through the comprehensive review and input received from the various bureaus and agencies, the following impediments were identified.

Impediments to Fair Housing Choice

IMPEDIMENT 1

High income levels and fees requested to rent apartments limits choices for persons on fixed incomes.

Documentation

The fair housing survey, for the purpose of the AI, revealed rental challenges for persons on fixed incomes due to the high levels of income and fees requested to rent apartments. According to a Housing Market Analysis prepared by Saratoga Associates in 2008, a three bedroom/one bath unit rented at approximately \$800 per month in the City of Troy. The 2008 Housing Market Analysis also revealed that extremely low-income and low-income households earning less than 51% of the area median income are not able to afford renting a majority of the housing units in the primary market area.

Recommendation

- Identify resources available to supplement rental costs for persons on fixed incomes.

- Continue to implement the Section 8 program through the Troy Housing Authority to assist in reducing rental costs for low-and moderate-income persons and persons on fixed incomes.
- Develop an affordable housing inventory that can be used to identify available affordable rental units.

IMPEDIMENT 2

Limited financial assistance for the elderly, low income, and disabled.

Documentation

The fair housing survey conducted for the AI revealed that the lack of available financial assistance for the elderly, low income, and disabled is limiting fair housing choice.

Lending institutions are changing their policies and re-designing lending programs, making it much harder for potential buyers to get financed. Confidence amongst lenders has plummeted and needs to be increased encouraging them to lend to one another again. Credit struggles have impacted mortgages in several ways including:

- More strict lending conditions;
- Increased interest rates;
- Increased deposit requirements;
- Decrease in mortgage products;
- Increase in arrangement fees; and
- Decreased mortgage lending approvals.

Lenders are being very cautious regarding who they will lend to and about taking in new business. Many people cannot get financed because they cannot meet the new strict requirements or eligibility criteria. Even if potential applicants meet the eligibility requirements of the lending institution, high interest rates make it very difficult for homeowners to get an affordable mortgage payment. Many lenders are also asking for a 10% deposit instead of the typical 5% which is also making it near impossible for first-time homebuyers who have no savings or previous property to take equity from to get a loan.

Recommendation

- Continue efforts to collaborate with lending institutions, public service agencies, and non-profits to identify available resources and programs to assist the elderly/low-income/and disabled.

IMPEDIMENT 3

Lack of accessible housing and accessibility barriers are impeding fair housing opportunities for persons with disabilities.

Documentation

The fair housing survey and outreach with the Independent Living Center revealed that there is a lack of accessible housing units for the disabled and that accessibility barriers, such as sidewalks and infrastructure, are impeding fair housing in Troy.

Outreach and meetings with staff from the Independent Living Center identified crucial needs for the disabled living in Troy including:

- Educational outreach;
- Street improvements (specifically lighting and sidewalk improvements for mobility and to assist the visually impaired);
- Consistent maintenance of public facilities such as elevators and rehabilitation of public restrooms to ensure accessibility;
- Façade improvements of businesses to allow for access;
- Appropriate grading of ramps leading to doorways;
- Interior accessibility including appropriate counter heights;
- Accessible housing;
- Accessible routes to housing structures; and
- Collaboration between committees, public agencies, and the Independent Living Center.

Recommendation

- Continue to implement tax exemptions for making adaptations to make a home more accessible for persons with disabilities.
- Enforce codes regulating that all new construction of multi-family (4 units or more), co-ops, and conversions must meet Section 504 of the American Disabilities Act (ADA).
- Conduct an assessment of accessible housing units and buildings in the City of Troy for the purpose of developing an inventory of accessible housing and buildings and providing that information to the public.

- Refer people to the Independent Living Center for educational information and brochures.
- Work with local housing organizations to provide a wide variety of housing services, including services to the disabled.
- Meet with design specialists to require and encourage housing designs and infrastructure improvements that consider the needs of the disabled.
- Provide builders and developers with information about the advantages of providing housing for this market.
- Continue to collaborate with the Independent Living Center when implementing housing rehabilitation or infrastructure improvement projects using community development funds.

IMPEDIMENT 4

Lack of affordable owner-occupied housing.

Documentation

The City of Troy's housing values continue to increase which may make it difficult for lower-income persons to become homeowners. As of 2000, the median value of a home in the City of Troy was \$85,100. The housing market has shifted considerably in almost a decade and despite the housing crisis being faced nationwide according to the ACS median home values in Troy increased to \$118,100. City-data.com reports that the median home or condo value rose again as of 2007 to \$141,919. The maximum affordable mortgage for a very-low income household in Troy is \$44,766.

Recommendation

- Encourage private developers to construct affordable housing.
- Determine locations for the development of affordable housing and work with local non-profits to acquire land for affordable units.
- Continue the Homeownership Program through the Troy Community Development Department providing homeownership opportunities to low-and moderate- income persons.
- Implement an inclusionary zoning policy aiding in the development of affordable housing.
- Continue the use of Community Development Block Grant Funds (CDBG) for housing rehabilitation activities to maintain the City's affordable housing stock.

- Work with housing organizations to continue efforts and collaborations on affordable housing and other fair housing needs.

IMPEDIMENT 5

Inadequate supply of Section 8 housing units.

Documentation

The fair housing survey conducted for the AI revealed the possibility that there is not a sufficient amount of Section 8 rentals/homes available in Troy to meet the demand. Many voucher holders may not be able to find suitable housing due to the misperception that Section 8 tenants are undesirable.

The Troy Housing Authority provides Section 8 housing assistance. The purpose of the Housing Choice Voucher Program is to promote adequate and affordable housing, economic opportunity, and a suitable living environment free from discrimination. Program objectives also include the provision of supportive services to improve recipients' employability. The housing authority manages 134 project-based section 8 apartments located in a Low Income Housing Tax Credit development and 791 Tenant Based Section 8 vouchers. There are 561 applicants on the Section 8 waiting list despite the capacity the housing authority has to provide rental assistance, indicating a demand for the Section 8 program and units.

Recommendation

- Work with landlords and large, privately-owned apartment complexes to identify misconceptions about the program and resources that will aid both tenants and landlords to match Section 8 tenants with affordable units based on fair housing criteria.
- Distribute written material to landlords, tenants, and the general public regularly through the Troy Housing Authority and Troy Realtors.
- Send individual letters to Section 8 landlords of multi-family properties encouraging their continued participation.

IMPEDIMENT 6

Discriminatory or unethical practices by landlords.

Documentation

The fair housing survey conducted for the AI revealed the possibility of limited housing choice due to discriminatory or unethical practices of landlords.

Recommendation

- Coordinate with TRIP to continue landlord training programs to educate landlords on ethical rental practices and provide information on New York’s landlord/tenant law.
- Conduct annual fair housing trainings for landlords or refer them to the NYS Commission on Human Rights and NYS Division of Housing and Community Renewal for information on fair housing laws and regulations and available trainings.

IMPEDIMENT 7

Lack of available vacant land in Troy to build affordable housing.

Documentation

The fair housing survey conducted for the AI and the City’s Comprehensive Plan reveals a lack of vacant land to construct affordable housing. The City is comprised largely of residential land at 35%. Residential is the predominant use of land in Troy followed by institutional uses at 25%, park and recreational land at 9%, commercial comprises 5%, and 4% is industrial. Only 22% of Troy’s land is vacant and may not all be zoned for residential use.

Consistent with the goals and objectives of the City’s Comprehensive Plan, the City has designed its zoning codes to foster the stabilization and improvement of existing neighborhoods and housing stock. The City recognizes housing as a high priority and the importance of encouraging the availability of a wide range of new housing opportunities for citizens of all income levels.

The code defines 15 zoning districts of which six specifically allow multi-family housing. One district is specifically zoned for single-family use and one district allows two-family residential units.

Recommendation

- Continue efforts to determine locations for the development of affordable housing units and work with local-non-profits to acquire land for affordable units.
- Utilize the analysis of land uses in the Comprehensive Plan and implement suggestions for developing residential units.

IMPEDIMENT 8

Lack of education regarding fair housing laws.

Documentation

The fair housing survey conducted for the AI and outreach to various local and state housing agencies revealed there is a lack of education regarding fair housing laws or how to submit a fair housing complaint which can impede fair housing in the City of Troy.

Recommendation

- Identify resources available to conduct education and outreach programs for protected classes to government, non-profits, and realtors with the intentions of raising awareness of housing discrimination violations and pertinent regulations.
- Develop fair housing brochures to be kept on site at City Hall, the public library, and other public venues.
- Publish contact information and referral information relating to fair housing in local newspapers or advertise where to obtain fair housing information through the local access channel.
- Collaborate with local housing organizations to provide educational outreach and fair housing trainings.

Conclusion

The City of Troy is committed to providing fair and affordable housing opportunities for all of its residents and will continue efforts towards eliminating fair housing impediments through implementing recommended actions. The City may implement some or all recommendations to address fair housing needs and selected programs will be determined by the amount of funding available to address impediments, priority community needs, and actions that are in the best interest of Troy residents. All information gathered during the Analysis of Impediments process as well as input received from public service agencies and residents will be considered in determining the best approach to eliminating fair housing impediments in Troy.



The City of Troy, New York, as a recipient of Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) funds through the U.S. Department of Housing and Urban Development (HUD), and in order to comply with its certification to affirmatively further fair housing, has conducted an Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the City of Troy. I affirm that the City of Troy will support activities to assure non-discrimination in the provision of housing and its accompanying transactions.

Harry J. Tutunjian
Mayor

Date

Figure B-1

Concentration: a census tract with a greater percentage than that group's overall percentage in the City
High Concentration: a census tract with twice the group's overall percentage representation in the City

Areas of African-American Concentration

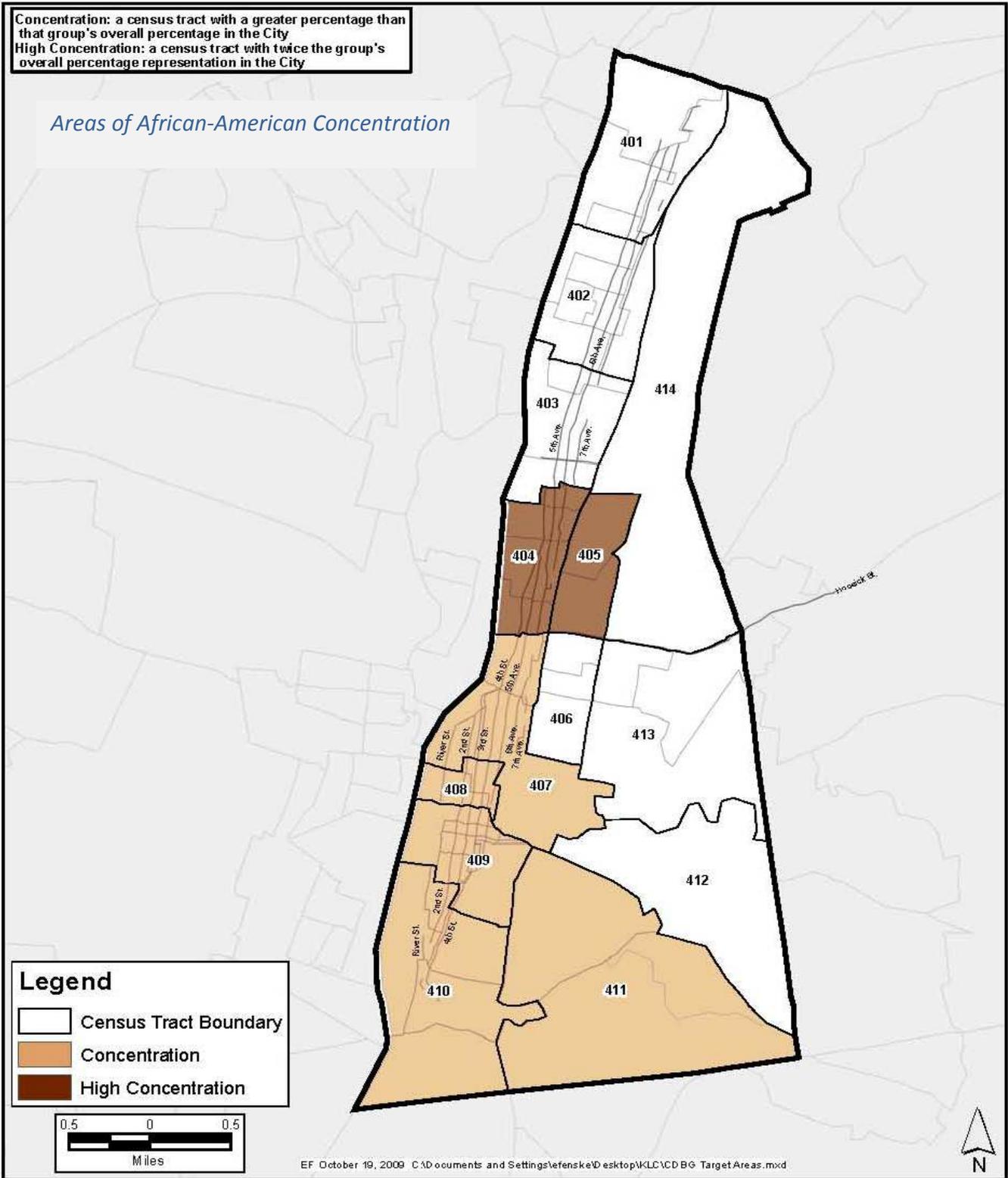


Figure B-2

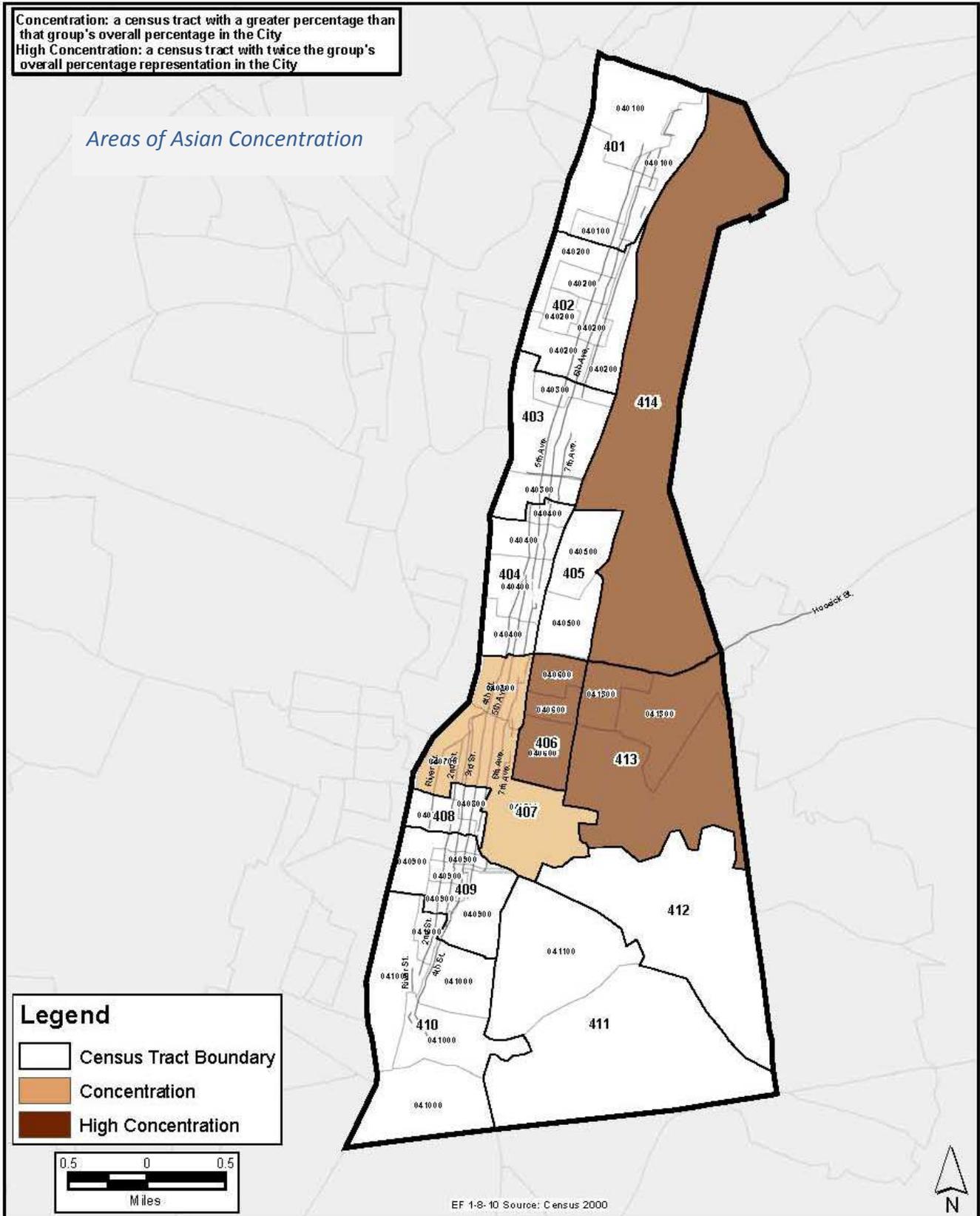


Figure B-3

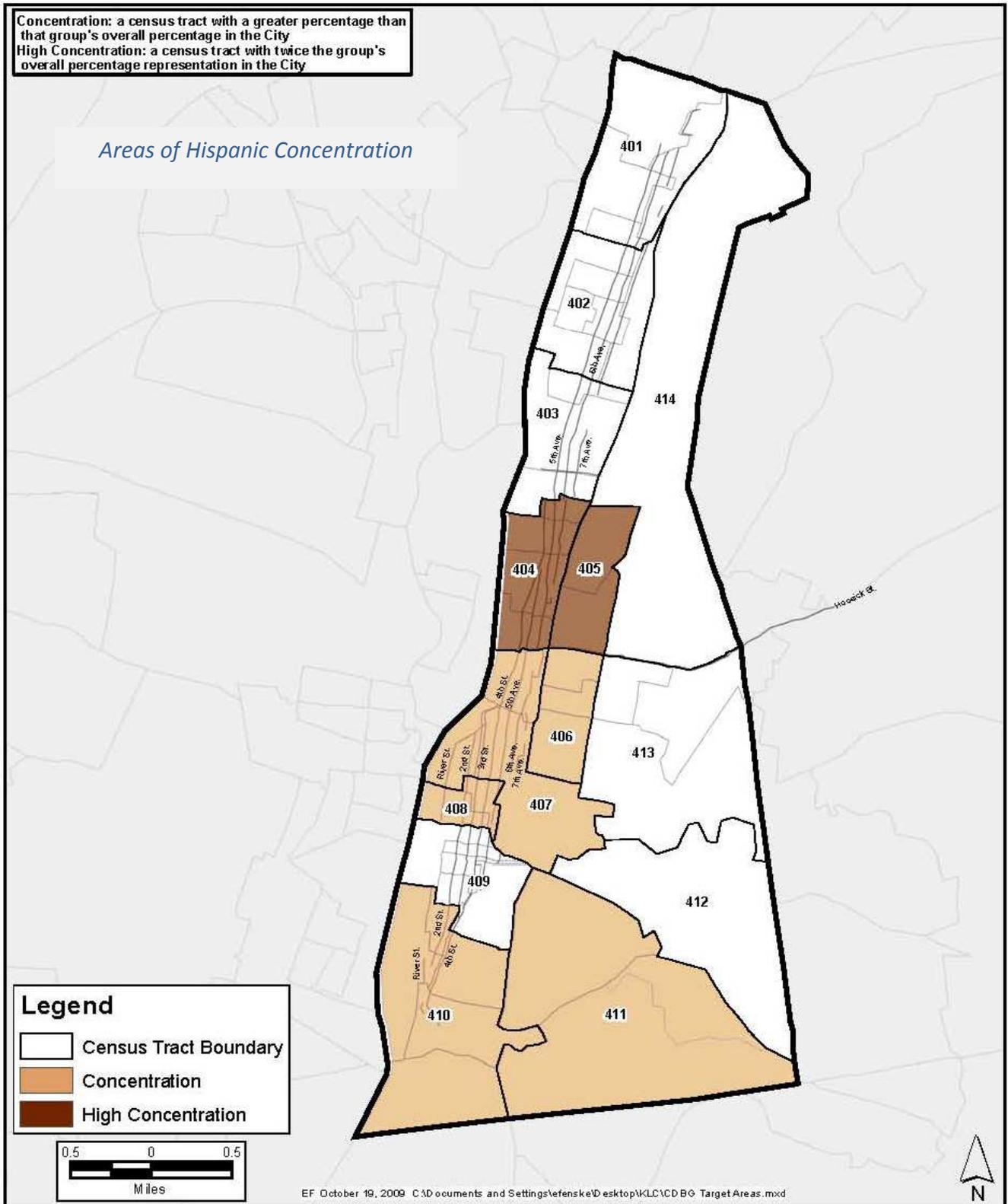
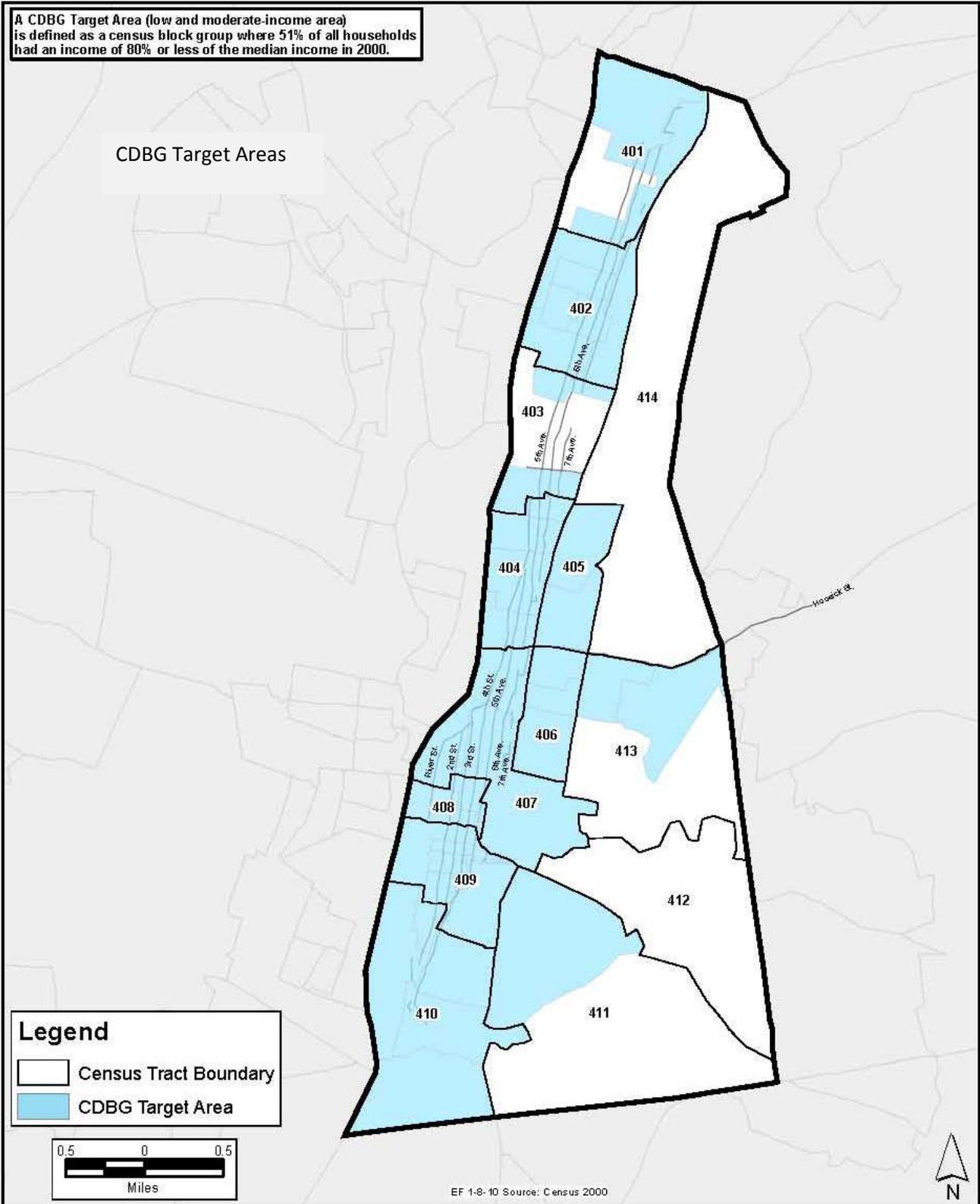


Figure B-4



Appendix C: Home Mortgage Disclosure Act (HMDA) Data

Due to the size of the HMDA data charts, information will be inserted into the document upon final production. The data is available via the HMDA website at <http://www.ffiec.gov/hmda/>.

Outreach List

<p>Lori A. Houston Bethany Hospitality Center, Inc. 27 State Street, 2nd Floor Troy, NY 12180 518-273-3529</p>	<p>Charles DeBrockey St. Peter's Residence Single Room Occupancy 2335 Fifth Avenue Troy, NY 12180 518-273-3291</p>	<p>Adam Kirkman Corporation for AIDS Research, Education, and Services (CARES, Inc.) 85 Watervliet Avenue Albany, NY 12206 518-489-2312</p>
<p>Tracy Neitzel Joseph's House and Shelter, Inc. 74 Ferry Street Troy, NY 12180 518-272-9370</p>	<p>Sister Linda O'Rourke Roarke Center 107 Fourth Street Troy, NY 12180 518-273-8351</p>	<p>John Riley Salvation Army 410 River Street Troy, NY 12180 518-272-4901</p>
<p>Reverend Donna M. Elia Troy Area United Ministries 392 Second Street Troy, NY 12180 518-274-5920</p>	<p>Thomas E. Hulihan Troy Housing Authority One Eddy's Lane Troy, NY 12180 518-273-3600</p>	<p>Patrick Madden Troy Rehabilitation and Improvement Program, Inc (TRIP) 415 River Street Troy, NY 12180 518-272-1950</p>
<p>Milinda Reed Unity House of Troy, Inc. 33 Second Street Troy, NY 12180 518-272-5917</p>	<p>Sherry Rounds YWCA of Troy-Cohoes 21 First Street Troy, NY 12180 518-274-2572</p>	<p>Karen Garofallou Independent Living Center 4 Broadway Troy, NY 12180 518-274-0701</p>
<p>Richard Jay Brill New York State Division of Human Rights Records Access Officer 718-741-8422</p>	<p>NYS Department of Housing and Community Renewal, Office of Fair Housing and Equal Opportunity Hampton Plaza 38-40 State Street Albany, NY 12207 518-473-2526</p>	

Fair Housing Survey

City of Troy Fair Housing Survey

As a recipient of federal funds through the Department of Housing and Urban Development (HUD), the City of Troy is required to conduct an Analysis of Impediments to Fair Housing Choice. The City supports fair housing and encourages citizen participation in identifying impediments to fair housing within the community. Please take approximately 5 minutes to complete the following survey. Information provided will allow the City to continue efforts to improve fair housing throughout the community. Thank you for your time.

Special Needs Populations

Please answer the following questions regarding fair housing for persons with special needs.

1. Is there sufficient housing in Troy for persons with disabilities?

Yes No Do Not Know

2. Is there sufficient housing in Troy for low to moderate income persons?

Yes No Do Not Know

3. Is there adequate supply of Section 8 rentals/homes available in Troy?

Yes No Do Not Know

4. Is there sufficient housing in Troy for the elderly?

Yes No Do Not Know

Transportation

Please answer the following questions to help identify relationships between transportation, employment, and housing.

1. Does public transportation in Troy lead to major employers?

Yes No Do Not Know

2. Is public transportation in Troy accessible to residential neighborhoods?

Yes No Do Not Know

Fair Housing Complaints

Please describe the number and types of complaints alleging housing discrimination that your organization has received (skip question if not associated with a public service organization).

1. Please list the number of discrimination complaints your organization has received for each category.

Racial	<input type="text"/>
Disability	<input type="text"/>
Religious	<input type="text"/>
Gender	<input type="text"/>
Age	<input type="text"/>
Families with Children	<input type="text"/>
Other	<input type="text"/>

2. Please list the number of times your organization has received a complaint citing discriminatory practice for each category.

Conditions of Sale or Resale	<input type="text"/>
Refusal to Rent	<input type="text"/>
Reasonable Accommodation/Relocation	<input type="text"/>

3. Please list the number of fair housing complaints successfully resolved or referred to HUD.

Resolved	<input type="text"/>
Referred to HUD	<input type="text"/>
Referred to other organization	<input type="text"/>

Fair Housing Impediments

Please check all impediments to fair housing that are applicable to the City of Troy. Describe any other impediments to fair housing that may exist or check the appropriate box if you feel there are no impediments to fair housing.

1. Please identify the areas you feel are impediments to fair housing in the City of Troy.

- | | | |
|---|---|---|
| <input type="checkbox"/> Accessibility Barriers (sidewalks/infrastructure etc.) | <input type="checkbox"/> Lack of Education and Outreach Regarding Fair Housing Law | <input type="checkbox"/> Municipal Regulations and Ordinances |
| <input type="checkbox"/> Availability of Affordable Owner-Occupied Housing | <input type="checkbox"/> Lack of Vacant Land for New Construction of Affordable Housing | <input type="checkbox"/> Poor Financial History of Potential Homebuyers |
| <input type="checkbox"/> Building or Zoning Code Provisions | <input type="checkbox"/> Landlords Discriminatory or Unethical Practices | <input type="checkbox"/> Predatory Lending Practices/Subprime Mortgages |
| <input type="checkbox"/> High Income Levels and Fees Required to Rent Apartments Limits Choice for Persons on Fixed Incomes | <input type="checkbox"/> Limited Financial Assistance for Elderly/Low Income/Disabled | <input type="checkbox"/> There are no impediments to fair housing in the City of Troy |
| <input type="checkbox"/> Inadequate Supply of Disabled Housing | <input type="checkbox"/> Locations of Banking Institutions and Real Estate Offices | |

Other (please specify)