ASSESSMENT OF FAIR HOUSING: ST. LAWRENCE COUNTY, NY 2017





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EXECUTIVE SUMMARY

This Assessment of Fair Housing was conducted by CNY Fair Housing, a private, non-profit organization which is a Qualified Fair Housing Enforcement Organization. The report is written according to new HUD guidelines on Assessments of Fair Housing, which are designed to replace the previous Analysis of Impediments process.

This analysis was conducted through review of past activities to affirmatively further fair housing, review of planning documents from various municipalities, the creation of maps and charts using data from several sources, and the convening of several roundtable discussions on fair housing in the county with stakeholders including planners, codes enforcement officers, property managers, real estate agents, county employees, human service providers, and community leaders.

The St. Lawrence County government has shown a commitment to pursuing advancements in fair housing. However, especially given that the county has no CDBG entitlement communities, they have been working with limited resources.

There are still substantial improvements that must be made, both in spreading fair housing knowledge and in policy changes that will facilitate advancements in furthering fair housing. A general lack of fair housing knowledge is shown by the 2015 settlement between the City of Ogdensburg and Step By Step, Inc., a non-profit that provides services for patients with mental illnesses. The city failed to grant a zoning change that would have allowed Step By Step to convert an old school into a facility that could provide their clients services after several residents expressed reservations about the effect on the neighborhood the city could have. The City of Ogdensburg agreed to pay \$150,000 to Step By Step.

In addition to a lack of knowledge regarding fair housing laws by government officials, there was general agreement in roundtables that landlords also lack knowledge of fair housing rules. It was discussed that there were larger property management companies which had the resources to provide adequate training to their staff, which allowed better knowledge and practices of fair housing laws. However, in much of the mostly rural county, there are many smaller landlords that lacked fair housing knowledge and oversight from a government entity.

The data and roundtables both bear out that a major problem in improving housing conditions in the county for vulnerable populations is a lack of access to funds for housing improvement. The average age of the population of the county is slowly growing older, and, correspondingly, have a higher share of the population. There is also an increase in the number of households led by single parents, especially female-headed households which have a higher poverty rate than the rest of the population.

The general population is also slowly becoming more diverse. In addition to the official census data, which shows a slow uptick in racial and ethnic diversity, the student body of the four largest colleges in the county has grown in diversity as well. Given this diversity, and the occasional tension between the student bodies and the surrounding communities, as discussed in the roundtables, it will be important to provide education about fair housing rights for students and to ensure adequate monitoring and action taken to ensure fair housing rights are not violated.

Larger economic trends of de-industrialization are also a threat to housing quality in the region. As former industrial hubs, such as Reynolds Metal and Alcoa, downsize and shutdown, many jobs in industrial towns are lost. This is creating a loss of population and more housing vacancies, as well as loss of income and depressed

housing values for people that remain, meaning people do not have resources to improve the housing stock. For example, in Massena the local housing authority has several family units in publicly owned houses permanently offline, as the private rental market is offering lower prices than the market rate value assigned by HUD.

Improvements have been made in recent years in improving procedures like codes enforcement and rental registrations to improve housing stock. However, there is still a long way to go. It can be difficult to collect fines levied for codes enforcement due to the need to go through the courts and convince a judge unfamiliar with the codes process to enforce rules on the books. In addition, outside the main population centers, there is very little code enforcement in areas that have significant housing needs. Similarly, rental registries have improved inspection processes, but are limited in scope. They exist in some population centers, and only for buildings for 3 or more units. Especially given that rental units in more rural areas often consist of single and two-family homes, expanding this process would be of help.

In order to help improve fair housing conditions in the county, this report makes several suggestions for policy changes. Suggestions to improve the quality of rental housing include making codes violations easier to enforce via a municipal ticketing process and expanding the use of rental registries to cover more properties. Fair housing education for government officials is necessary to prevent future erroneous policy decisions. Additionally, fair housing education for service providers and tenants will help identify and ameliorate more cases of housing discrimination, while further training sessions for landlords will help to prevent housing discrimination from occurring.

During the roundtable, the difficulty of applying for and obtaining funds for home improvement through the county was discussed. Different funding sources, such as funds through Community Block Development Grants and the Weatherization Assistance Program, have different funding proposals that are often complex, time consuming, and require technological knowledge that not everyone has. Creating a simplified, streamlined application to help homeowners apply for funds to improve their homes, as well as support for those trying to fill out those applications, would go a long way towards helping improve the quality of housing stock.

A last recommendation that was created based on roundtable discussions is to create preferences in the Section 8 voucher waiting list process for vulnerable populations. This report suggests creating preferences for victims of domestic violence and veterans and recommends local housing authorities seek technical assistance from HUD and other nearby Housing Authorities that have created similar preferences.

INTRODUCTION

The Assessment of Fair Housing for St. Lawrence County, New York was conducted by CNY Fair Housing, Inc., a private, non-profit organization which is a qualified fair housing enforcement agency.

BASIS OF THIS STUDY

Under the Fair Housing Act, the US Department of Housing and Urban Development (HUD) is obligated to administer its programs in such a way as to "affirmatively further fair housing" (AFFH), a requirement that extends to grantees of HUD programs as well as sub-recipients. The Community Development Block Grant (CDBG) program specifically contains a regulatory requirement that entitlement jurisdictions certify that they will affirmatively further fair housing as a condition of the receipt of that funding.

In July 2015, HUD instituted a new regulatory rule regarding the obligation to AFFH. The goal of the new rule is to help program participants better understand the actions they need to take to meet their AFFH obligation and to assist participants with assessing fair housing issues in their communities to help them make informed policy decisions.

As explained in the new rule, affirmatively furthering fair housing "means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." This obligation extends not only to HUD funded programs, but to all of participant's activities and programs relating to housing and urban development.

Specifically, a participant must take meaningful actions that work towards the following objectives:

- Address significant disparities in housing needs and in access to opportunity,
- Replace segregated living patterns with integrated and balanced living patterns;
- Transform racially and ethnically concentrated areas of poverty into areas of opportunity; and
- Foster and maintain compliance with civil rights and fair housing laws.

Prior to the new rule, the AFFH obligation required the grantees to undertake the following activities to further fair housing:

- 1. Conduct an Assessment of Fair Housing to identify impediments to fair housing choice within the jurisdiction.
- 2. Take appropriate actions to overcome the effects of any impediments identified through the analysis, specifically by working in recommendations into a Comprehensive Plan.
- 3. Maintain records reflecting the analysis and actions in this regard.

Under the new rule, the Analysis of Impediments (AI) that communities were required to complete is replaced by an Assessment of Fair Housing (AFH) which requires a broader look at factors affecting housing choice and access to opportunity. The change to an Assessment of Fair Housing applies for the first time to jurisdictions who have Consolidated Plans due in 2017.

DEFINING THE ANALYSIS

Under the new AFFH rule, an Assessment of Fair Housing should seek to use data and community input to do the following:

- Identify integration and segregation patterns and trends across protected classes within the jurisdiction and region;
- Identify racially or ethnically concentrated areas of poverty within the jurisdiction and region;
- Identify whether significant disparities in access to community assets exist across protected classes within the jurisdiction and region; and
- Identify whether disproportionate housing needs exist across protected classes within the jurisdiction or region.

HUD lays out four parts to the new Assessment of Fair Housing Process. The first is provision of data by HUD using the AFH Assessment tool. However, since St. Lawrence County is not an Entitlement Community, HUD does not provide data in the AFH Tool. Attempts to contact HUD for the data tables were not returned. Instead, this analysis uses data from other sources, namely Census data, to replicate the HUD AFH data. Part two is analysis, based on the data as well as local knowledge provided in the community outreach process. Part three is review and response by HUD, who have 60 days after receipt to determine whether the Analysis has met the requirements for providing the analysis, assessment, and goal setting. The final part is incorporating the goals identified into the AFH into jurisdiction planning, including in the Consolidated Plan, the Annual Action Plan, the PHA Plan, and the Capital Fund plan.

Based on this review, an Analysis should seek to identify and prioritize fair housing issues, identify the most significant determinants related to these issues, and establish goals for addressing the determinants.

METHODOLOGY

To evaluate the barriers to housing choice in St. Lawrence County, CNY Fair Housing conducted several research activities:

- Data analysis and mapping
- Review of documents and existing studies
- Interviews and focus groups

The Analysis follows HUD's recently developed AFFH Assessment Tool to the best extent possible. However, HUD's AFFH Data Tool does not provide data and maps for the county because it is not a CDBG entitlement community. Accordingly, this analysis uses other sources to provide the data found in the AFFH Assessment Tool.

Data Analyses

In conducting this analysis, data were utilized from numerous sources. Data tables that are required to be part of the new Assessment format were created following HUD guidelines. Maps included in this report were created by the St. Lawrence County Planning Department and by CNY Fair Housing using Policy Map software from the Community Reinvestment Fund. The primary data source for the original maps and charts created by CNY Fair Housing were the 2010-2015 ACS 5-year estimates from the US Census Bureau. Secondary sources include the NYS Department of Education data, HUD data, enrollment data from local colleges, and The Center for Community Studies at Jefferson County Community College.

Document and Study Review

A number of documents and studies were reviewed to inform this analysis including the following:

- St. Lawrence County, "County Policy Guide 2011"
- Development Authority of the North Country, "2016-2020 Action Plan"
- Development Authority of the North Country, "HUD Program Year 4 Action Plan 2014"
- Development Authority of the North Country, "Housing Development Policies"
- St. Lawrence County "2013 Comprehensive Economic Development Guide"
- St. Lawrence County "Hazard Mitigation Guide"
- St. Lawrence County "Analysis of Impediments to Fair Housing Workshop Ogdensburg, November 8, 2010"
- St. Lawrence County, "Fair Housing 1999"
- City of Ogdensburg, "2015 Housing Needs Assessment"
- City of Ogdensburg, "2016 Downtown Waterfront Core BOA Plan Nomination Study"
- Town of Canton, "Community Action Plan 2011"
- Village of Potsdam, "2012-2022 Plan"
- Town of Hammond, "Town and Village Comprehensive Plan April 2013"

OVERVIEW OF FAIR HOUSING LAWS

A combination of federal, and state fair housing laws apply in St Lawrence County.

The first housing discrimination protections were established with the Civil Rights Act of 1866, which held that "all citizens of the United States shall have the same right, in every State and Territory, as is enjoyed by white citizens thereof to inherit, purchase, lease, sell, hold, and convey real and personal property." While by statute, the Act

bans discrimination on the basis of race or color, through case law, it has been determined to prohibit discrimination on the basis of national origin and religion as well.

For almost a century, the 1866 Act went largely unenforced. To address the continuing unequal access to housing, particularly for racial minorities, Congress passed Title VIII of the Civil Rights Act of 1968, the Fair Housing Act, which prohibits discrimination in housing based on race, color, religion, and

The first housing discrimination protections were established with the Civil Rights Act of 1866

national origin. The Fair Housing Act was amended in 1974, to include sex as a protected class and in 1988, to include disability and familial status.

In addition to these federal laws, additional protected classes have been established under law. New York State Executive Law §296 prohibits discrimination on the basis of race, color, creed, national origin, sex, familial status, disability, age, marital status, military status, and sexual orientation. There are no additional protections established by local laws in Jamestown.

Fair housing laws apply to all housing-related transactions including real estate sales, rentals, mortgage lending, homeowners' insurance, zoning and housing-related harassment.

The Fair Housing Act specifically identifies prohibited practices in Sections 3604, 3605, 3606 and 3617. These prohibited practices include:

- To refuse to sell or rent, to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of their membership in a protected class.
- To discriminate against any person in the terms, condition, or privileges of sale or rental of a dwelling, or
 in the provision of services or facilities in connection therewith, because of their membership in a
 protected class.
- To make, print, or publish, any notice, statement, or advertisement, with respect to the sale or rental of
 a dwelling that indicates any preference, limitation, or discrimination based on membership in a protected
 class.
- To represent to any person because of race, color, religion, sex, handicap, familial status, or national origin that a unit is not available for inspection, sale, or rental when such dwelling is in fact so available.
- To refuse to permit a reasonable accommodation or modification for a person with a disability when such an accommodation or modification is necessary to afford such person equal opportunity to use and enjoy a dwelling.
- A failure to design and construct multi-family housing to meet accessibility standards.

While discrimination can occur overtly, such as a landlord stating that they will not rent to a family with children, the law also covers practices that are less direct. One such area is differential treatment. For example, a landlord cannot apply a more stringent application process to members of a protected class. Another category of practices covered under the law is disparate impact. These are practices that are seemingly neutral, yet have a disproportionate negative impact on members of a protected class. For example, a landlord may institute a policy that they will only accept income from work to verify that someone is qualified to rent a unit, however this practice could have a disproportionate effect on people with disabilities or women with children who receive child support. Regardless of the landlord's intent, the discriminatory effect of these practices would constitute a violation of fair housing laws.

Under these provisions, a range of historical practices that have the effect of limiting access to housing for members of protected classes have been interpreted to be illegal under the Fair Housing Act. These include racial steering, exclusionary zoning, blockbusting, discriminatory advertising, and redlining in mortgage, insurance and appraisals.

Both the Fair Housing Act and New York State Human Rights Law provide an administrative process to investigate complaints and pursue legal action on behalf of victims of discrimination. Individuals may file administrative complaints with HUD or the New York State Division of Human Rights which is considered a substantially equivalent agency. Complaints filed with HUD are referred to the Division of Human Rights for investigation. If violations are proven, victims are eligible for monetary compensation and affirmative relief. Injured parties, including organizations, may also file civil cases on their own in state or federal court.

Assessment of Past Goals and Actions

The County has shown a consistent commitment to furthering fair housing principles and taking actions to affirmatively further fair housing, despite working with limited resources. The St. Lawrence County Fair Housing Task Force was founded in 1991 and has been continually active since. The participants are often involved in many issues of planning in the county, and oftentimes function as a panel of experts on several county issues.

Fair Housing knowledge seems to still be limited, and localities have had problems with not complying with Fair Housing laws in the past few years. The City of Ogdensburg settled with Step-by-Step, an organization which provides mental health services, for the process by which the zoning board rejected a proposal to repurpose a former school into a new facility that would provide housing for patients with mental illnesses.

Two Impediments of Analysis processes have been undertaken by the Fair Housing Taskforce, the first in 1999 and the second in 2010. The resulting products were not full reports, but rather summaries of roundtable discussions held to discuss the state of fair housing in the county.

The 1999 Al process identified 4 key areas for improvement:

Education, Outreach, and Discrimination - addressed the idea that further education and evaluation of fair housing issues are needed in the county, including the need to find increased funding for housing for protected classes.

Housing condition and access – addressed the need to make physical improvements to housing stock to better serve those who have special needs, and to improve living conditions in low-income housing.

Specialized housing programs – many participants in the sessions described the need for more specialized housing programs, yet cited significant barriers in zoning and codes issues, as well as lending and insurance restrictions.

Transportation issues – In a rural county, it was noted that decent and affordable housing is often inaccessible to persons in need due to a lack of personal and public transportation.

The Breakout Group focusing on solutions came up with the following goals:

A large focus was placed on outreach and education, especially with churches and service providers, as well as creating an informational clearinghouse (which included a suggestion of a website in the early days of the popular use of the internet).

An increase in funding, with incentives to increase landlord investment of their own money, was also suggested as a way to upgrade the quality of housing stock, as was an improvement in the quality of codes enforcement.

There was also a suggestion to provide facilities that provide 24-hour access to housing for mentally ill persons. However, there is an unfortunate allusion to the negative stigma of this type of housing, and the affect it may have on the existing tax base in the neighborhood and the reactions that it may bring.

Moving forward, the group hoped to include their ideas on fair housing in their consolidated plan.

In 2010, the county held an Analysis of Impediments to Fair Housing Workshop. The group focused on similar themes, but had a more focused approach in building short and long-term strategies to overcome impediments to fair housing. These were broken into the following two categories:

Educating the Public about Housing Discrimination: Building from a consensus that knowledge on fair housing in the county was still widely lacking, the participants recommended a variety of strategies to increase knowledge. In the short term, the groups focused on providing information on the county website, distributing fair housing materials to relevant parties such as landlords, insurance agencies and more, airing public service announcements about housing discrimination, and delivering presentations to groups like landlord associations. Longer term strategies include requiring landlords with codes violations to take education courses that incorporate Fair Housing, as well as including Fair Housing in education programs for young adults.

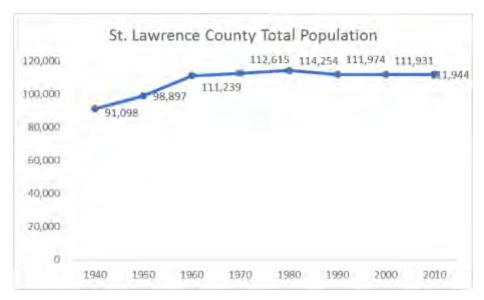
Improving the Quality of Affordable Housing: Participants in the roundtable noted that many fair housing impediments are tied to a lack of income, as St. Lawrence County is one of the poorest counties in the state. The first short term strategy focused on providing tax relief, through New York State's 421-f program, to incentivize landlords to repair rental units and provide affordable rent. The other strategy included improving landlord conduct by providing a standardized rental application for tenants to use, as well as an online database of rental units which allow tenants to rate landlords. A longer-term strategy to improve rental units discussed was expanding rental unit inspection and certification programs, which were in existence in many of the county's population centers but not in the broader area. Additionally, participants identified several funding sources that the county should help landlords utilize to improve rental unit homes, including funds from CDBG, HOME, AHC, NYSERDA, and Restore, as well as a special focus on leveraging Weatherization Assistance Program funds.

FAIR HOUSING ANALYSIS

Demographics

Like many rural counties, the population of St. Lawrence County has mostly been in decline since the later portion of the 20th century. Following a brief surge in the early 90's, the population peaked at a total of 114,867 in 1993. Since then, the population has been in a slow decline, with the 2016 estimate of 110,038 being the lowest yet. The Cornell Project on Applied Demographics predicts the population to continue declining at an even faster rate, dipping to 99,887 by 2040.

Figure 1: St. Lawrence County Total Population



Correspondingly, the population of the county has been slowly growing older. The share of population over 65 reached 16.8% in 2010, and is expected to grow to 19.3% by 2020.

Figure 2: Share of Population over 65, St. Lawrence County, 2015

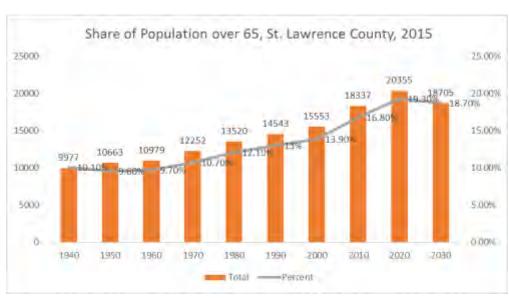
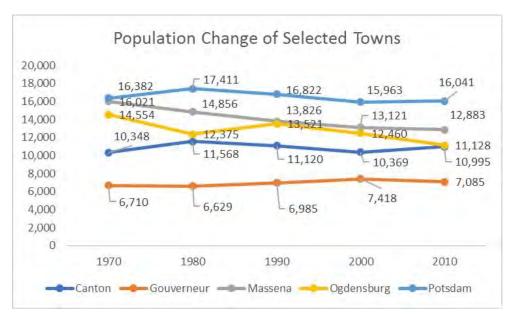


Figure 3: Population Change of Selected Towns

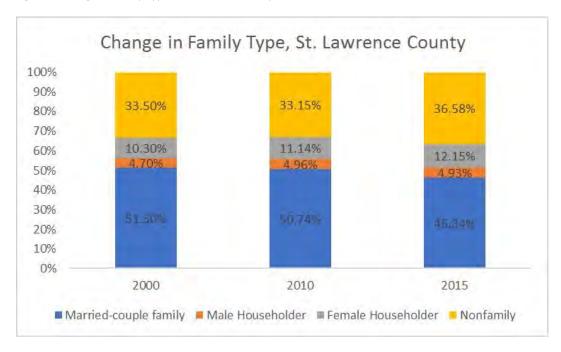


As shown by the Figure 3, population trends differ by town. Relatively, the "blue collar" belt of Ogdensburg and Massena are seeing their populations decline quickly while facing regional small-town challenges with de-industrialization, while the "white collar" belt of Potsdam and Canton are seeing their population, fueled by colleges, remain stable or even grow. Interestingly, Gouverneur has seen its population

grow, most likely due to the presence of a state prison and the increase of military population from nearby Fort Drum in Jefferson County.

The County is also seeing a slow decrease in the amount of married-couple families, and small growth in female headed households as well as a larger increase in the amount of nonfamily households. As will be shown later, single-parent female-headed households face a much higher poverty rate, and are thus more vulnerable to housing instability and poor living conditions.

Figure 4: Change in Family Type, St. Lawrence County



The racial makeup of St. Lawrence County's population remained largely white, though has slowly grown more diverse over that past few decades. This is largely driven by the college towns of Potsdam and Canton, which have grown more diverse at a faster pace than the county as a whole.

The census data, displayed on Figures 5, 7, and 8 does not accurately take into account the entire population picture in terms of the housing market, as many students at the four universities are counted in census data as living in their home towns. The population of these universities have been consistently growing more diverse.

Population by Race, St. Lawrence County 100% 90% 80% 70% 60% 50% 40% 30% 20% 10% 0% 2000 2010 2015 ACS ■ White ■ Black M American Indian Asian Native Hawaiian and Other Pacific Islander Some other race

Figure 5: Population by Race, St. Lawrence County

As shown in Figure 6, the enrollment totals at the area universities are significantly more diverse than the surrounding town. SUNY Potsdam and SUNY Canton are the most diverse schools, with 62.4% and 66.3% of students that are white, respectively for 2016 enrollment. This is compared with 93.1% of the county that was white in 2015.

Figure 6: Enrollment totals at Area Universities

Name	Total	Undergraduate	Men	Women	Native	Asian	Black	Latino	Hawaiian/Pacific	White	Two or More	Unknown	Non-Resident Alien
SUNY Potsdam	3,696	92%	42.5%	57.6%	1.7%	2.1%	11.1%	14.3%	0.1%	62.4%	2.5%	5.1%	0.7%
Clarkson	4,384	75%	70.0%	30.0%	0.3%	3.0%	2.4%	4.7%	0.0%	81.6%	2.5%	2.0%	3.6%
SLU	2,464	45%	45.1%	54.9%	0.2%	1.6%	3.2%	4.4%	0.0%	78.4%	2.0%	1.6%	8.5%
SUNY Canton	3,205	42%	42.4%	57.6%	1.6%	0.9%	13.3%	10.6%	0.2%	66.3%	2.2%	2.7%	2.1%

Figure 7: Population by Race, Potsdam

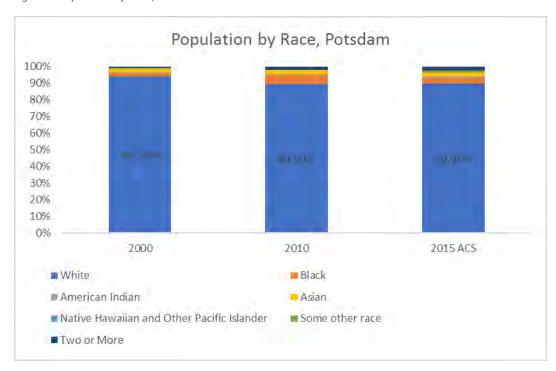
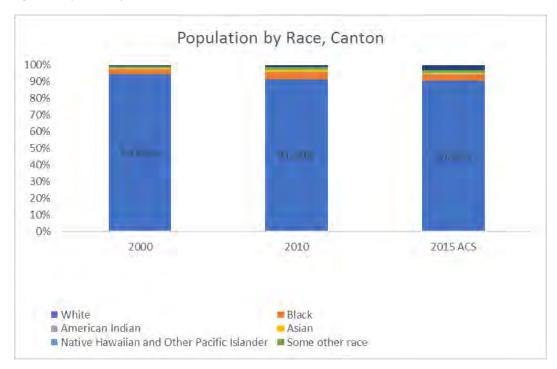


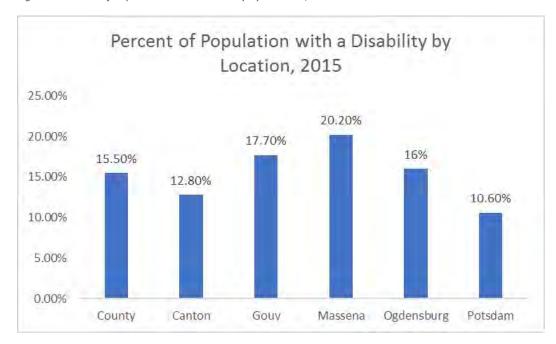
Figure 8: Population by Race, Canton



St. Lawrence County has a disproportionate share of the population that is disabled. 15.5% of the population of the county has a disability, compared with 12.2% of the population of the United States and 11.1% of the population of New York State as a whole. The share of the population with disabilities will likely grow as the population of the country continues to grow older. Geographically, the percentage of the population that is

disabled varies widely, with 20.2% of the population in Massena having a disability compared to 10.6% of the population of Potsdam.

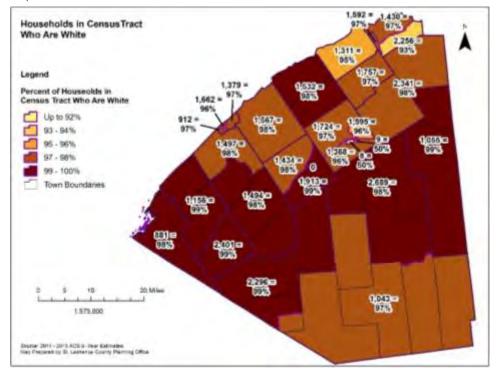
Figure 9: Percent of Population with a Disability by Location, 2015



Segregation/Integration

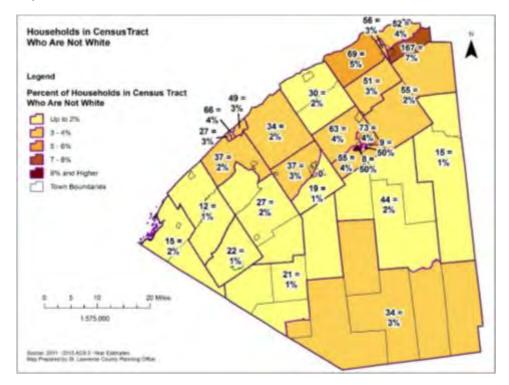
While the diversity of the county is slowly growing, the population is still overwhelmingly white. As shown in the

Map 1: Households in Census Tract Who Are White



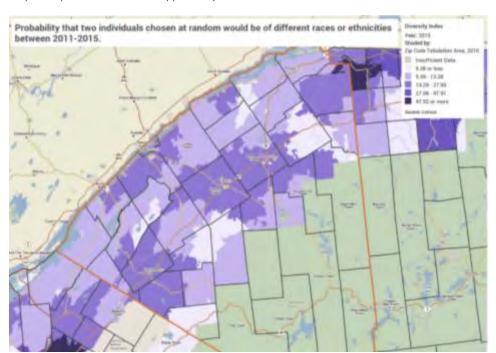
demographics section, the most diverse areas are found in the college towns of Canton and Potsdam, largely driven by college enrollment. However, since the minority population is so small, the patterns of racial segregation that often develop in more populated, diverse cities are largely absent.

Map 2: Households in Census Tract Who Are Not White



Racially/Ethnically Concentrated Areas of Poverty

HUD guidelines recommend that Assessments of Fair Housing identify racially and ethnically concentrated areas of poverty (R/ECAPS) within the jurisdiction. Racially and ethnically concentrated areas of poverty are defined as census tracts with a non-white population of 50 percent or more and where 40 percent or more of individuals are living below the poverty line. According to this standard, St. Lawrence County has no census tract, or any other geographic measurement, that meets the qualifications of being more than 50% minority or has a poverty rate over 40%.



Map 3: Disparities in Access to Opportunity

Disparities in Access to Opportunity

In guidelines set forward by HUD, a fair housing analysis should seek to identify disparities in access to opportunity for protected classes. Given the small population of St. Lawrence County, these disparities are tempered. The smallest unit of measurement for most of the data collected to analyze disparities in access to opportunity is the census tract or town boundaries. Especially in the more rural

areas of the county, census tracts and towns are both typically geographically expansive and don't show disparities distinctly. Further, with a small number of minorities, there is little racial and ethnic segregation. While the population of those with disabilities is more concentrated in certain areas of the county than others, the lack of distinct segregation means access to jobs and transportation, or exposure to environmental toxins are not going to vary significantly by protected status. For this reason, it is necessary to not only discuss measures of access, but also disparities in outcomes by race, ethnicity, and other protected status.

To measure disparities in access to opportunity, HUD has developed a set of seven indices within five areas identified as opportunity indicators: poverty, education, employment, transportation, and health. Each of the indices seeks to measure the extent to which a neighborhood offers assets related to the opportunity indicators and then compares these indicators across individuals in particular racial and economic subgroups.

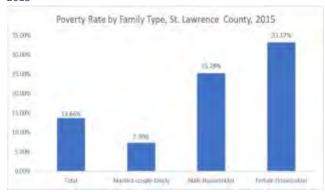
Poverty

Countywide, there are differences in the level of poverty by both race and familial type. It is important to note that due to the sample size for racial minorities in the county, data on these groups is problematic and of limited value for drawing conclusions. However, combined with local knowledge, it can be used to begin to obtain a

Figure 10: Poverty Rate by Race, St. Lawrence County, 2015

Poverty Rate by Race, St. Lawrence County, 2015 40.00% 37.40N 35.00% 31,60% 30.00% 25,00% 20.60% 20,00% 13,50% 15:00% 1000001 6.80% 7. BOING 5.00W 0.00% White Black or Asian Two to More American Hispanic Alatka Marive American

Figure 11: Poverty Rate by Family Type, St. Lawrence County, 2015



picture of the current situation in the county on this issue.

The most notable racial disparities in poverty rates are found in the population of people identifying as Native American and Two or More Races, with the poverty rate reaching over 30% in both demographic groups. In addition, the poverty rate for Hispanics is over 20%. However, again, it is important to note that the sample size for these populations (as well as for all non-white populations) is extremely small, and prone to significant errors.

Significant disparities are also found in the poverty rate among family types. The poverty rate for married families is only 7.3%, while for female headed households the poverty rate is 33.17%. Median income by family type matches this pattern, with median income for married couples well over double that of female headed households.

There are small yet significant differences in the poverty rates in different geographic locations. Of the most populous towns in the county, the town of Gouverneur has the highest percentage of individuals in poverty at

25.8%, followed closely by Ogdensburg and Massena. Slightly lower are Potsdam and Canton, at 19.7% and 18.9% respectively. As shown by Map 4, for where there is data available, there are high rates of poverty in the rural areas outside of these population centers.

Figure 12: Poverty Rate Among Individuals, St. Lawrence County, 2015

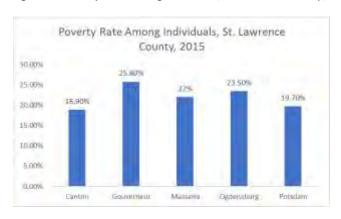
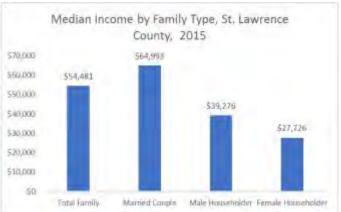


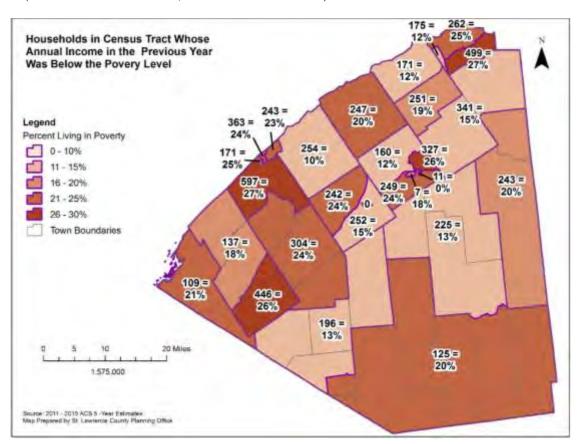
Figure 13: Median Household Income by Location, 2015

Figure 14: Median Income by Family Type, St. Lawrence County, 2015





Map 4: Households in Census Tract, Annual Income Below Poverty Level



Education

Figure 15: Students Scoring Proficient on Math by Race/Ethnicity, Grades 3-8 in 2016

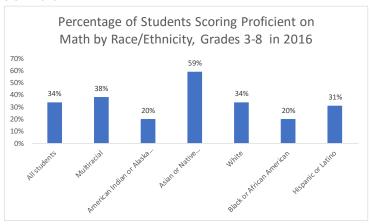
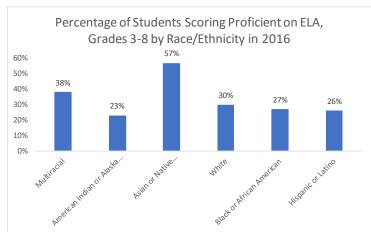


Figure 16: Students Scoring Proficient on ELA, Grades 3-8 by Race/Ethnicity in 2016



There are notable racial disparities in English Language Arts and Math proficiency rates for students grades 3-8. As figures 15 and 16 show, Black and American Indian students scored noticeably lower than white students, while Asian or Native Hawaiian Islander students have much higher scores than the other racial and ethnic groups.

A large and interesting disparity can be found between the proficiency levels of students who are and are not economically disadvantaged. Figures 17 and 18 show economically disadvantaged students had rates of 19% proficiency on ELA and 24% proficiency on math, while their non-economically disadvantaged counterparts had proficiency rates of 43% and 45% on the same topics. Given the wealth and poverty rate disparities between family types, it is reasonable to assume that children in single parent households, especially female led single family households, are more likely to underperform in schools.

Figure 17: Students Scoring Proficient on Math by Various Categories, Grades 3-8 in 2016

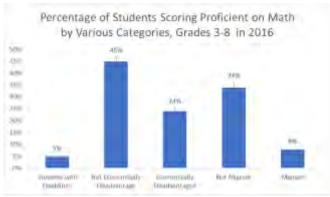
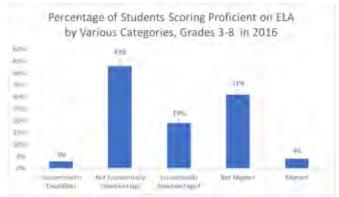
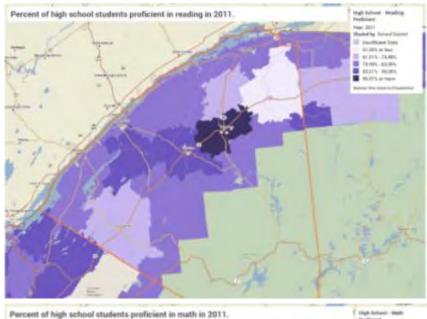
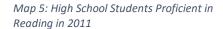


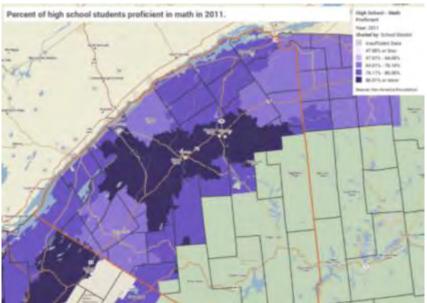
Figure 18: Students Scoring Proficient on ELA by Various Categories, Grades 3-8 in 2016





Geographically there are also distinct differences in educational outcomes. As Map 5 shows, scores for Math and ELA proficiency are noticeably higher in Canton, Potsdam, and some of the more rural areas than Ogdensburg, Massena and Gouverneur. This also fits poverty patterns; in areas of higher poverty there is lower educational attainment.





Map 6: High School Students Proficient in Math in 2011

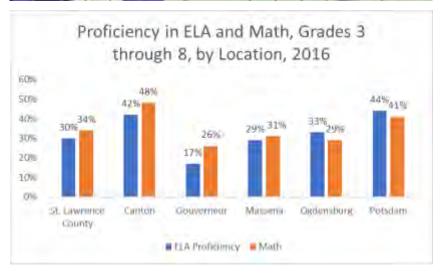
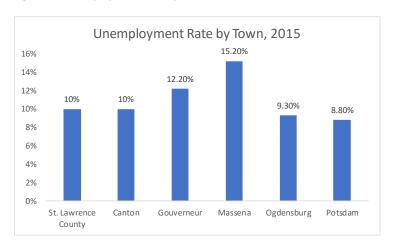


Figure 19: Proficiency in ELA and Math, Grades 3-8 by Location in 2016

Employment

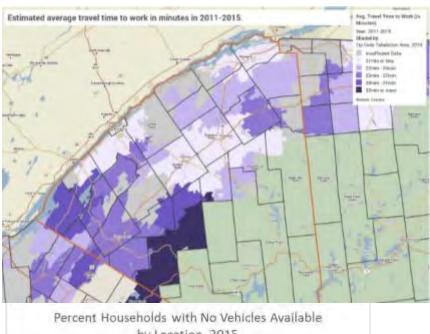
Of the population centers, the unemployment rate in 2015 was highest in Massena and lowest in Potsdam. As discussed in the roundtable sessions, several manufacturing hubs in Massena, and Ogdensburg to a lesser degree, are in the process of downsizing or closing completely. As a result, unemployment is likely to continue to rise, especially as spin-off jobs are also lost. This is especially concerning given the high share of disabled population. As the economic situation in the town continues to decline, that will likely cause the housing stock to continue to deteriorate, reducing the amount of opportunity for this protected class.

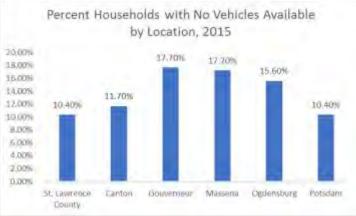
Figure 20: Unemployment Rate by Town, 2015



Transportation

Map 7: Average Travel Time to Work in Minutes, 2011-2015





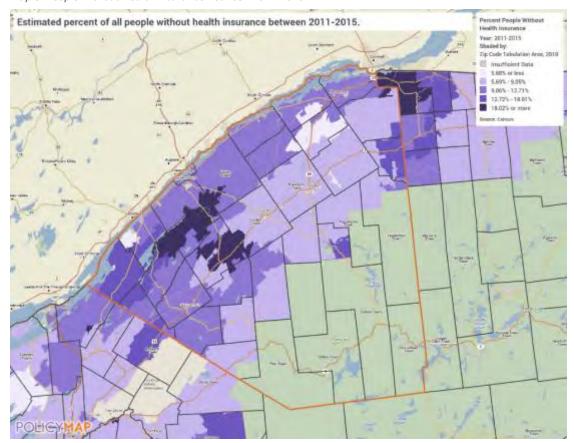
Being a rural, spread out county, much of the transportation in the county is focused on personal car travel. There is a series of bus routes that connects several towns in the county. However, there are limited pickup times and there are few transportation options to travel to specific locations in towns. Additionally, in breakout sessions, several service providers talked about the general lack of public transportation options. As shown by the map, commute times are relatively uniform throughout the district. There is a significantly higher rate of those without cars in Gouverneur, Massena, and Ogdensburg than in the rest of the county, suggesting those are the areas where people struggle most with accessing adequate transportation.

Figure 21: Households with No Vehicles Available by Location, 2015

Health

There are 5 hospitals in the county: Gouverneur Hospital, Massena Memorial Hospital, Claxton-Hepburn Medical Center in Ogdensburg, Canton-Potsdam Hospital in Potsdam, and Clifton-Fine Hospital in Star Lake. This leaves the largest geographical area without a hospital in the eastern rural portion of the county.

The share of people without health insurance is relatively lower in Canton and Potsdam compared with Massena, Ogdensburg, Gouverneur, and much of the rural areas for where there is data available.

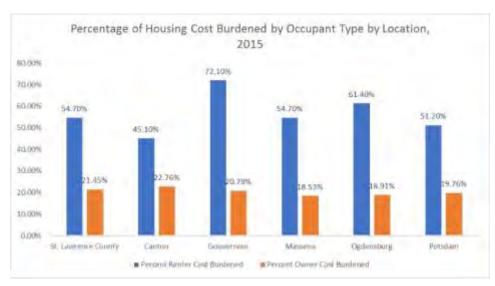


Map 8: People without Health Insurance Between 2011-2015

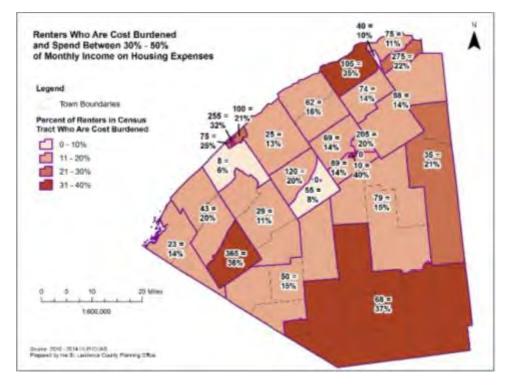
According to the New York Department of Health, St. Lawrence County had a .6%, or 6 per 1,000, incidence of elevated blood levels of lead for children in 2012, which is the latest year for which data is available. This is fairly similar to rates in surrounding counties, with a 9 per 1,000 children rate in Lewis County and a 6 per 1,000 rate in Jefferson.

Disproportionate Housing Needs

Figure 22: Housing Cost Burdened by Occupant Type by Location, 2015

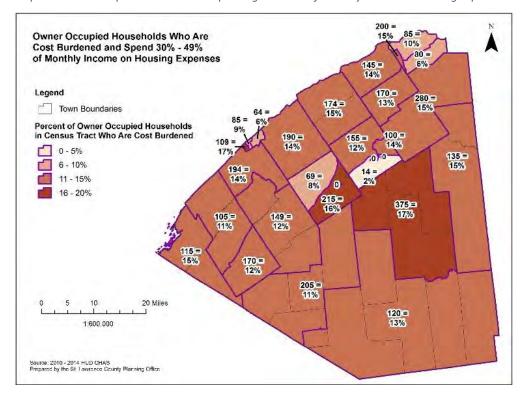


Map 9: Renters Cost Burdened Spending 30%-50% of Monthly Income on Housing Expenses

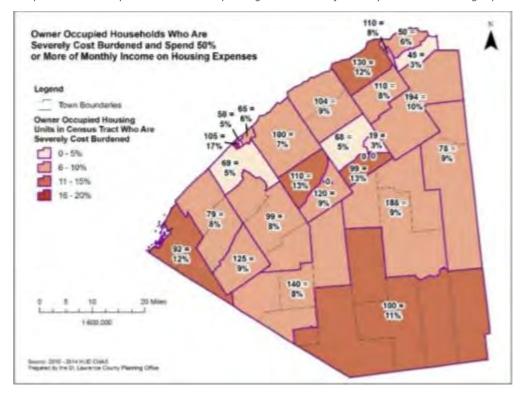


There are large discrepancies in the depth of housing needs by geographical location and type of occupant. Renters, in every geographic location, are much more likely to be cost burdened, defined as paying over 30% of monthly income on rent, as well as severely cost burdened, defined as paying over 50% of monthly income on rent. Gouverneur has by far the largest share of renters who are cost burdened, followed by Ogdensburg with 61.4%. Interestingly, the town of Canton has the highest share of home owners who are cost burdened with 22.76%. Overall, there are not large geographic differences in the number of homeowners who are cost burdened. There is also a large share of renters who are cost burdened in the lesser populated towns, but the data may be influenced by a small sample size. The town of Potsdam, which has a 51.2% cost burdened rate for renters, has the largest share of their population renting their housing.

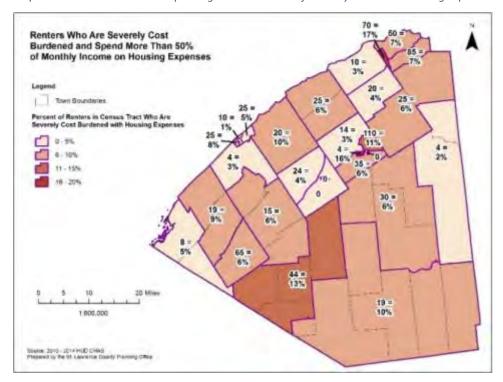
Map 10: Owner Occupied Cost Burdened Spending 30%-49% of Monthly Income on Housing Expenses



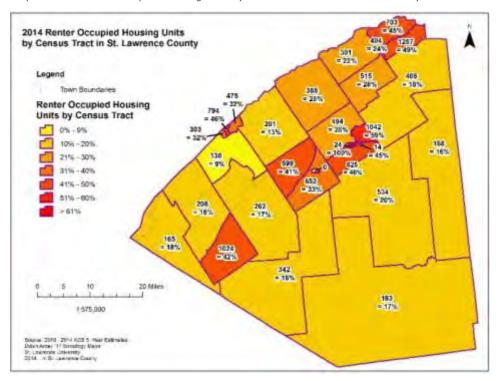
Map 11: Owner Occupied Cost Burdened Spending 50% or More of Monthly Income on Housing Expenses



Map 12: Renters Cost Burdened Spending More Than 50% of Monthly Income on Housing Expenses



Map 13: 2014 Renter Occupied Housing Units by Census Tract in St. Lawrence County



Map 14: 2014 Distribution of Affordable Housing-Number of Households Paying 20% or Less of Income on Rent

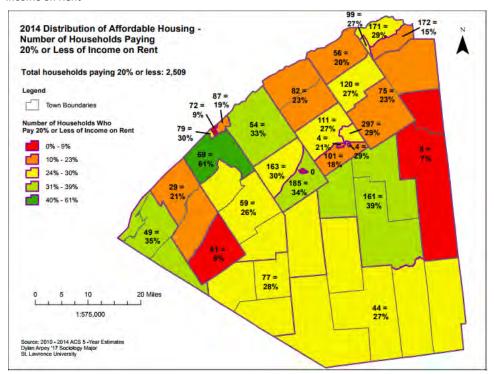
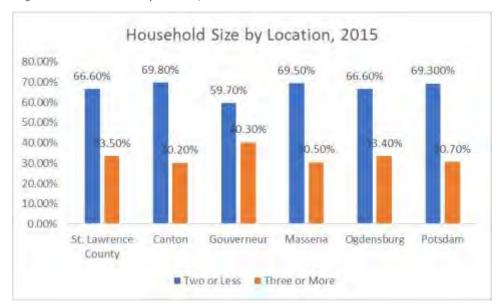


Figure 23: Household Size by Location, 2015



Household size throughout the county is relatively uniform, except for Gouverneur, which has slightly more houses with 3 or more occupants. As such, overcrowding is not identified as a significant problem in the area. The median housing stock age is relatively older in Ogdensburg and Massena than the rest of the county, as these two towns largely developed with the manufacturing boom of the early 21st century. There are also census tracts in rural areas which have relatively older housing stock as well, which suggest that there could be trouble with housing quality in those areas.

The median housing stock age Map 15: Median Year Housing Stock was Construction in St. Lawrence County

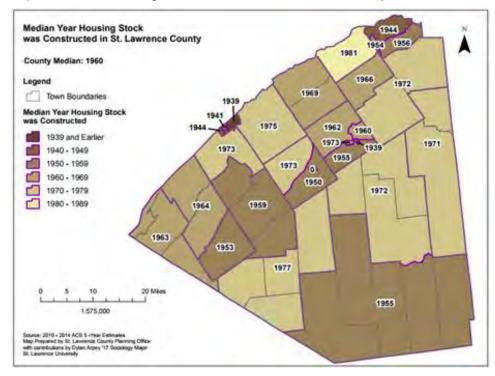


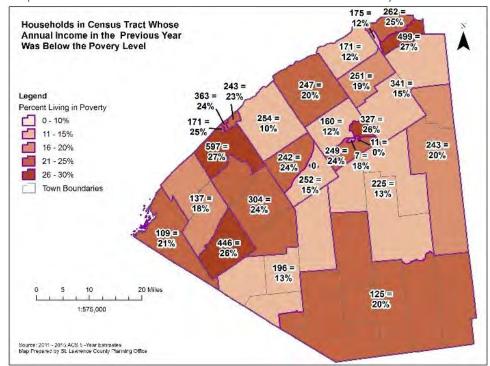
Figure 24: Vacancy Rate by Location, 2015



The data for vacancy rate in the county as a whole is skewed by census data counting seasonal homes that are not occupied for the entire year as technically "vacant". There are several towns, such as Hammond, which have a vacancy rate well over 30% due to the presence of vacation homes on the St. Lawrence River. This skews the overall vacancy rate for the county as a whole to over 20.2%, which is likely to be much lower if seasonal homes were not counted as vacant.

Housing conditions and access to opportunity are likely to be much worse in areas of high poverty. Also, as shown by the demographic breakdown, female headed households are in poverty at rates higher than other

Map 16: Households in Census Tract Whose Annual Income Was Below Poverty Level



household types, and are therefore more likely to lack access to quality, affordable housing.

The roundtable discussion often centered on the topic of a widespread lack of quality affordable housing, and addressed a lack of access to funds as one of the most important factors in the failure to maintain housing stock.

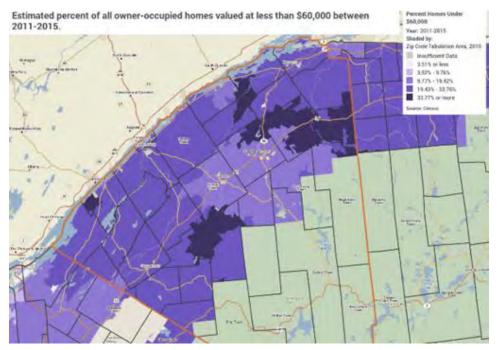
Another factor in poor housing conditions is a lack of power for codes enforcements officers, as well as gaps in rental registry processes. Outside of the five

major population centers, it was agreed upon that there was essentially no codes enforcement. Often, the codes enforcement officer does not know that they have the power to enforce codes violations, and instead think that

they are just there to issue building permits.

There was also the sentiment that there was little recourse for codes officers who come upon the worst of conditions. Buildings are often deemed to be condemnable, but codes officers are unlikely to act because those living in the building are highly likely to become homeless if their building is condemned. Owner-occupied property was basically considered untouchable for codes, with participants saying the idea of "rugged individualism", in which people can choose how they live, is influential in the area.

Map 17: All Owner-Occupied Homes Valued at Less than \$60K 2011-2015



There was also a suggestion that a lack of code enforcement especially has an impact on elderly and disabled people who cannot escape their situations. One pertinent example discussed was of a building with many rental apartments that was owned by an elderly gentleman who was a hoarder, and refused to have anyone help him keep the building up. Instead, he continuously lowered the rent until he found new tenants, who were mostly disabled or elderly and could not find rent for that price elsewhere, and did not have the resources to get help with the conditions in the building.

However, in the larger population centers, there was agreement that things have improved over the last 30 years. In Gouverneur, especially, buildings have come a long way since tenement buildings in terrible condition that were standard in the past. It was acknowledged that enforcement certainly wasn't perfect, but was improving.

Map 18: Housing Units That Lack Complete Plumbing Facilities 2011-2015

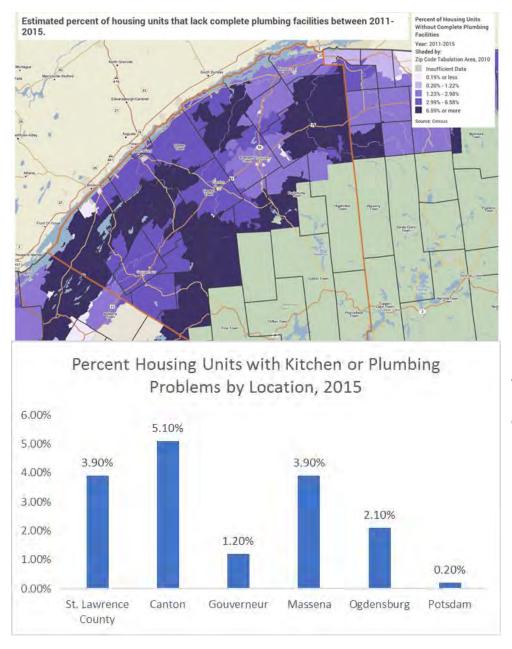
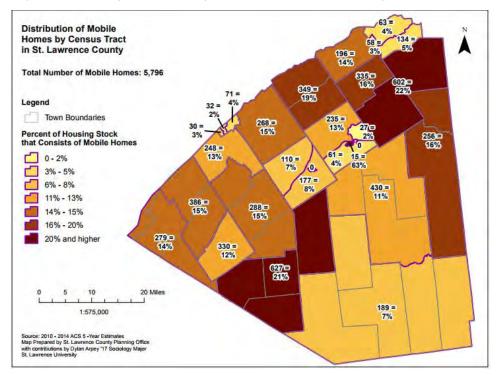


Figure 25 and Map 18 show areas where there are significant shares of housing that lack complete plumbing or kitchen facilities, a useful measure in determining the most extreme cases of a lack of quality housing. Interestingly, Canton has a high rate of housing that lacks complete plumbing or kitchen facilities. As the map shows, and corroborating with data on vacancy rate and discussions at the roundtable, this suggests there are significant housing needs in Canton outside of the village. In addition, the less populated, rural areas of the county also have a high prevalence of housing needs.

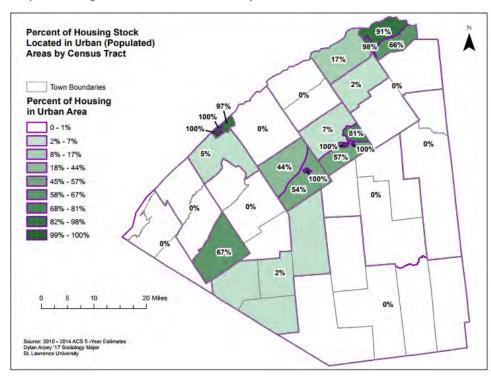
Figure 25: Housing Units with Kitchen or Plumbing Problems by

Mobile homes were particularly cited as areas that suffered from a combination of a lack of investment and a lack of codes enforcement. Mobile homes are eligible for home improvement grants run through the Weatherization Assistance Program. However, there was again a feeling that the knowledge of and ability to access these funds was much too low considering the amount of improvement needed at mobile homes.

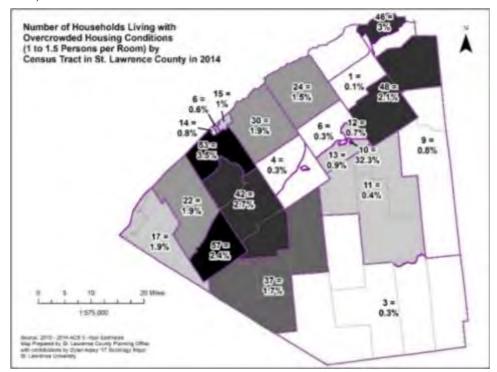
Map 19: Distribution of Mobile Homes by Census Tract in St. Lawrence County



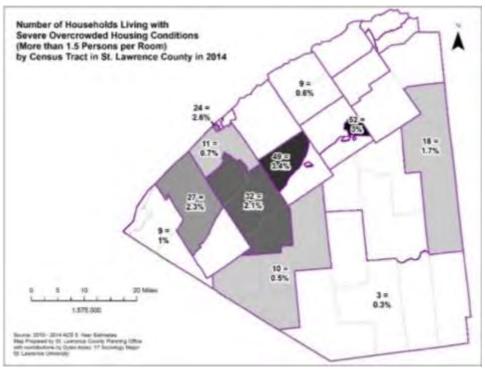
Map 20: Housing Stock Located in Urban Areas by Census Tract



Map 21: Households Living with Overcrowded Housing Conditions by Census Tract in St. Lawrence County in 2014



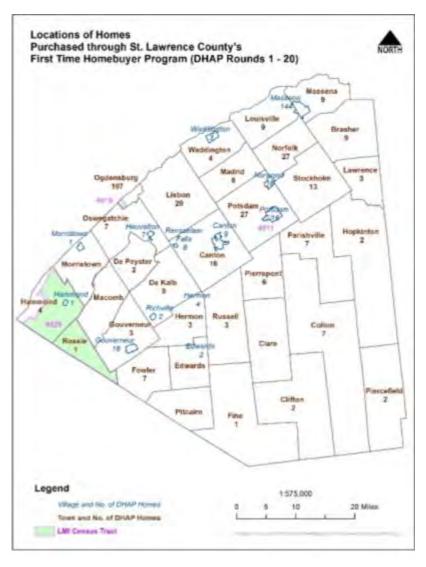
Map 22: Households Living with Severe Overcrowded Housing Conditions by Census Tract in St. Lawrence County in 2014



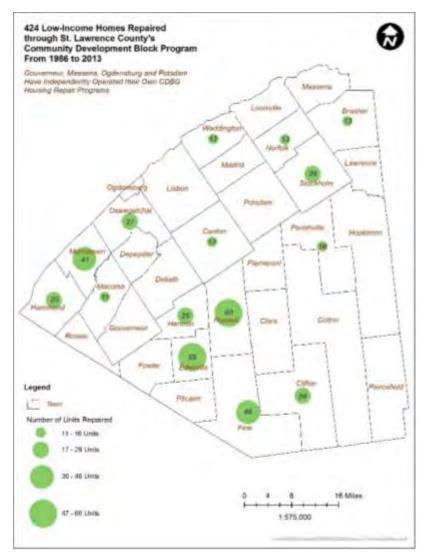
Another useful piece of data in determining where there may be an excess of housing needs is the share of units that are overcrowded. As shown by the map, there are relatively high rates of overcrowding in many areas outside of the population centers. The higher rates of severe overcrowding conditions, as defined as more than 1.5 people living in each room, are found in the village of Potsdam as well as in Canton.

The county did receive several sources of funding (such as LIHTC, CDBG, HOME, etc.) designated for home improvement. However, in the roundtables, there was a feeling that these funds are not being adequately used due to the complex application process. Much of the population that are most in need of these funds are elderly, and struggle to adequately complete the application process, especially if it is online. Many programs also require a level of investment from the property owner in order to access matching funds, which often served as a barrier in accessing those funds. This leads to a dangerous cycle: needed funds not being accessed, leading to less funds from the federal government, to even less funds being used.

Map 23: Homes Purchased Through St. Lawrence County's First Time Homebuyer Program by Location



Map 24: Low-income Homes Repaired through St. Lawrence County's Community Development Block Program 1986-2013



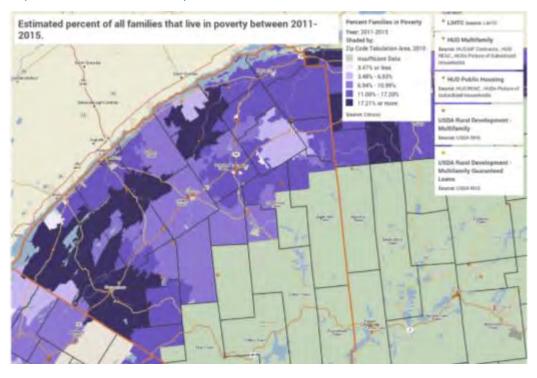
Two maps show the uneven utilization of home improvement and home ownership programs throughout the county, showing a greater need for a process that engages all people in all locations so that they are able to access resources to acquire and improve homes. The number of lowincome houses that utilize CDBG funds is wildly uneven, with a large number of units in the towns of Russell, Edwards, Morristown, and Fine. Meanwhile, Canton, which has shown a relatively significant amount of housing needs and a large population, has a smaller number of units which are worked on. It is important to note that Massena, Potsdam, Ogdensburg, and Massena administer their own individual CDBG plans, so their totals are not connected to this map. Meanwhile, the first-time homebuyer program is used much more extensively in Ogdensburg than in any other municipality.

Publicly Supported Housing Analysis

Figure 26: Publicly Supported Housing by Location

Location	St Law County	Ogdensburg	Massena Village (part)	Canton Village	Potsdam Village
Subsidized Units Available	2079	359	429	211	417
% Occupied	94	98	93	89	92
Number of people total	3319	466	778	317	598
number of people per unit	1.7	1.3	1.9	1.7	1.5
Number of people total	3319	466	778	317	598
Avg family expenditure/month	325	327	317	328	344
Avg HUD Expend/month	564	435	503	378	642
Household income/year	14294	14266	14073	15688	15619
household income/person/year	8506	10807	7235	9304	10369
% of local median (Household income)	32	33	30	35	36
%very low income	88	88	91	85	81
% extremely low income	58	53	66	48	47
% white non-hispanic	97	97	98	96	97
Average months on waiting list	20	16	21	19	12
%0-1 beds	63	75	52	66	76
% 2 bedrooms	20	18	24	12	15
% 3+	17	7	25	22	9
% overhoused	9	8	12	6	3
% in poverty (census tract)	23	23	25	24	25

Map 25: Families That Live in Poverty 2011-2015



Publicly supported housing projects are relatively spread throughout the district. This includes traditional publicly run housing facilities, as well as housing built using tax credits. There are traditional public housing complexes administered by local public housing authorities in the four large population centers of Canton, Massena, Potsdam, and Ogdensburg. HUD provided data on the

demographics of residents of these complexes show broad similarities between the different PHAs. However, the profile of Massena (the largest PHA) shows some difference than the other three, as the data shows more occupants per unit, lower income per person, a lower family contribution to rent, and more low and extremely low income residents.

The roundtable sessions provided a wealth of valuable information on public housing in the county. County representatives reported that the number of assigned Section 8 vouchers for the county to administer was 717 at the end of March, however the Section 8 office was told they had a few months to whittle this number down to 689. The waiting list time for Section 8 is currently 2-5 years. Attrition happens mostly through death, with most of those receiving vouchers staying on the program for a long period of time.

There were few reports of landlords refusing to take section 8 vouchers, given the low demand in the rental market. However, there can be problems with finding housing that will pass Section 8 inspections.

A positive development reported around Section 8 was an increase in pay standard because of rent increases in Canton and Potsdam due to student housing and in Gouverneur due to increased members of the military looking for housing.

The Section 8 administrators expressed some confusion about how exactly to work with the Department of Housing and Community Renewal on how to set up preferences for those on the wait list, such as those for veterans and victims of domestic violence. However, they were interested in working to set those preferences up in the future.

In Massena, public housing officials face a unique challenge. There was a feeling that the given average market rate rent is set too high, given the rapidly decreasing demand for housing due to several factories and plants being closed. This leads to private landlords undercutting the pricing for public housing. This has been exacerbated by decreasing family-age population and several family units are permanently vacant and have been taken permanently offline.

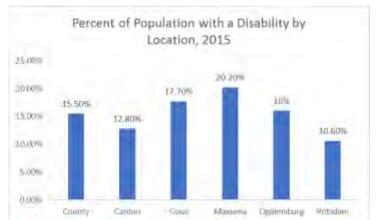
There was discussion about the technical definition of homelessness being too narrow, and preventing those in need from accessing publicly supported services. These are often individuals or families who are sleeping on couches of relatives or friends, constantly bouncing around place to place. However, because they are not technically without a place to stay, they cannot access public services that would help their predicament.

Multiple service providers stated that many landlords are too intrusive in attempting to determine whether elderly tenants are able to live on their own. Often this may be well intentioned, with property managers truly believing that people need more help. Other times, this is a thinly veiled attempt to remove a tenant from the premises.

Disability and Access Analysis

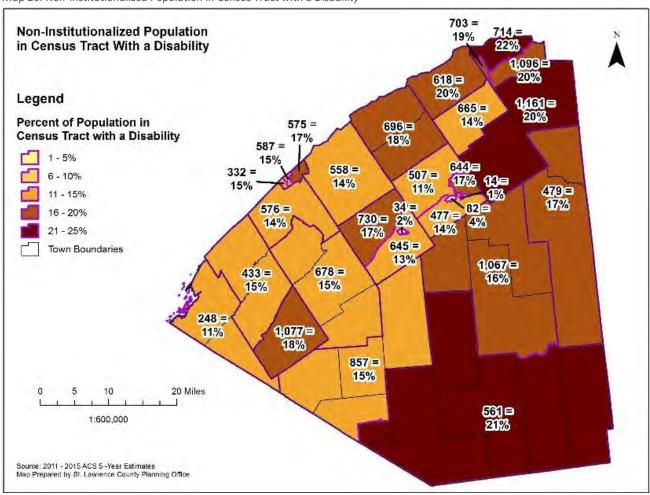
While not quite raising to patterns of entrenched segregation, the population of individuals with disabilities varies widely between towns. For example, in Massena, 22.2% of the population has one or more disabilities,

Figure 27: Population with a Disability by Location, 2015

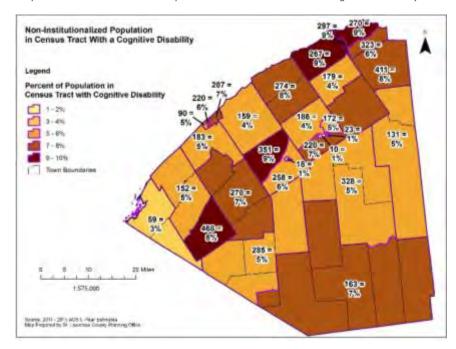


compared to 10.6% in Potsdam, a college town. This pattern largely holds true for the county as a whole, with a higher concentration of people with disabilities in more industry-based and rural areas when compared to "white-collar" areas.

Map 26: Non-Institutionalized Population in Census Tract with a Disability



Map 27: Non-Institutionalized Population in Census Tract with a Cognitive Disability



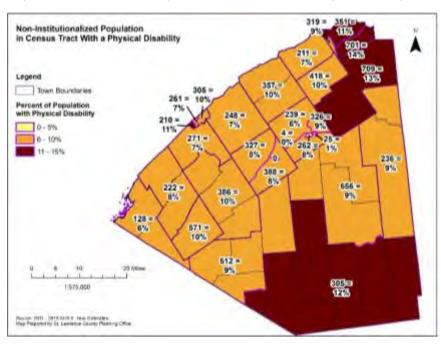
As shown by the maps, Massena has a high rate of people with both physical and cognitive disabilities. In addition, several rural areas, including the multi-town census tracts at the southern edge and the Northeastern edge of the county, also have high rates of both physical and cognitive disabilities. This is notable due to the lack of services found in those areas.

This trend was brought up frequently in roundtables, with the specific phrase that "Massena feels dumped on" used often. The overall sentiment was that Massena and Ogdensburg are required to provide for service-dependent populations, while communities like Potsdam and

Canton, which have more resources, do not have the same obligation.

There are troubling instances of a lack of fair housing knowledge leading to discrimination against people with disabilities. In May of 2015, the city of Ogdensburg refused a zoning change that would have allowed Step by Step, a mental health service provider, to build a facility in an old middle school the organization purchased. In the decision, the city council specifically cited comments by residents that expressed concern with a mental health center in their neighborhood. Following an April 2016 decision by a U.S. District Court Judge that the city must permit the use of the school, the city and Step by Step settled for \$150,000 in August of 2016.

Map 28: Non-Institutionalized Population in Census Tract with a Physical Disability



Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

When prompted at the first roundtable session held for this report, there was some disagreement among a group of private landlords, realtors, codes enforcement officers, and a local judge on whether there was adequate knowledge among housing providers. At first there was agreement among respondents that there was a general lack of knowledge on fair housing rules. However, it was then stated that there was a split between the type of landlord. Larger property owners that hired property managers generally provided training for those managers and made their best efforts to learn and abide by fair housing rules. There was large agreement that smaller landlords who owned only a few properties were generally unaware of fair housing rules.

Service providers who were asked about the issue also felt there were problems with fair housing knowledge, and the ability for vulnerable tenants to seek help even if they felt their rights were being violated. One provider explained that they knew discrimination is against the law, but if they push to get their clients housed in an unwelcoming environment it will lead to them being harassed. Similarly, their clients are often in desperate need of housing, and do not have the time or resources to fight the discrimination that they face.

A key example of the challenges faced by vulnerable populations, and of a lack of fair housing knowledge, is the 2016 settlement between the City of Ogdensburg and Step by Step, Inc. This type of violation of the Fair Housing Act in the county shows a need for further fair housing education and enforcement, especially among those who are responsible for planning and implementing processes of zoning changes.

The County has a fair housing officer, and a Fair Housing Taskforce that was created and has been continually working since 1991. The taskforce's work is highly encouraging, as it has been explicitly dedicated to advancing fair housing throughout its existence. This can be rare with county taskforces, which often conjoin affordable or general housing policies in similar efforts.

The county is served by CNY Fair Housing, a non-profit that receives funding through the Fair Housing Initiatives Program. CNY Fair Housing is also the author of this report. CNY Fair Housing is a qualified fair housing enforcement organization which can investigate fair housing complaints, and work to resolve situations or take legal action if necessary. The county can refer cases to CNY Fair Housing if an investigation is needed.

In a 2016 survey taken by The Center for Community Studies at Jefferson County Community College (shown in Figures 28-31) showed women, young people, people making under \$50,000 a year and renters are more likely to report having faced housing discrimination in the past year. This suggest further education and outreach efforts should be focused on these groups, with encouragement for these people to report the discrimination they face. It may be particularly helpful to focus efforts on areas where these categories overlap such as low-income women under the age of 30.

Figure 28: Incidents of Discrimination, Overall

		Frequency (weighted)	Percentage (weighted)
	Yes	-11	3.3%
In the past 12 months have you experienced what you perceive to be housing discrimination when buying or renting a home in St. Lawrence County?	No, and I have been involved in the process of buying or renting a home	77	22.2%
	No, but I have not been involved in the process of buying or renting a home	249	72.1%
	Not Sure	8	2.4%
	Totals	345	100.0%

Figure 29: Incidents of Discrimination by Education Level and Household Income

	Education Level			Annual Household Income			
	No College	Some College	4+ Year Degree	Under \$25,000	\$25,001 - \$50,000	\$50,001 - \$75,000	Over \$75,000
Yes	2.4%	6.9%	0.4%	2.6%	7.3%	3.2%	3.1%
No, and I have been involved in the process of buying or renting a home	24.4%	16.3%	25.3%	17.3%	21.1%	21.1%	34.6%
No, but I have not been involved in the process of buying or renting a home	69.8%	74.9%	73.4%	80.2%	70.6%	75.7%	61.7%
Not Sure	3.4%	1.8%	0.9%	0.0%	0.9%	0.0%	0.6%
Sample Size - Raw Sample Size -	96	119	132	54	74	67	92
Weighted	168	102	75	73	69	67	75

Figure 30: Incidents of Discrimination by Housing Occupancy Type

	Current Homeowner or Renter		
	Rent	Own	
Yes	6.1%	2.6%	
No, and I have been involved in the process of buying or renting a home	38.2%	18.4%	
No, but I have not been involved in the process of buying or renting a home	55.1%	76.6%	
Not Sure	0.6%	2.5%	
Sample Size - Raw	52	292	
Sample Size - Weighted	69	273	

Figure 31: Incidents of Discrimination by Gender and Age

	Gender		Age Group.					
	Male	Female	18-29	30-39	40-49	50-59	60-69	70+
Yes No, and I have been involved in the process of buying or renting a home. No, but I have not been involved in the process of buying or renting a home.	2.6%	4.0%	5,7%	3,8%	2.9%	3.8%	0.0%	0.6%
	23.7%	20.8%	20.2%	45.6%	33.0%	17.5%	26.4%	7.4%
	70.4%	73.8%	68.6%	47.6%	62.7%	78.6%	69.6%	91.2%
Not Sure	3.3%	1.5%	5.6%	2.9%	1.5%	0.0%	4.0%	0.8%
Sample Size - Raw	139	208	28	35	33	90	82	79
Sample Size - Weighted	172	173	84	36	32	105	42	47

CNY Fair Housing has received seven calls from residents of St. Lawrence County since 2014. The calls were on the following topics: One called seeking funding for a ramp, one involved lending, one involved a reasonable accommodation for an air conditioner unit, and four involved potential harassment from other tenants, property management, or both. None of the cases were elevated to a formal legal case.

Given the level of housing discrimination recorded both nationally and locally in surveys, it is incumbent upon CNY Fair Housing and the County government to conduct more education surrounding fair housing.

Fair Housing Testing

While a review of complaints filed with enforcement agencies provides some information on the extent to which housing discrimination occurs in St. Lawrence County, it is inherently limited. First, it only provides information on cases where a victim realizes they have been discriminated against and has the capacity and willingness to pursue a complaint. Nationally, it is estimated that up to 90% of discrimination cases go unreported. Locally, as previously mentioned, surveys have shown that there is a significantly higher amount of people responding that they have faced housing discrimination than people who report those instances. Second, the information available publicly is limited, so even a review of complaints tells little about what is occurring in the housing market.

To better assess the extent that housing discrimination occurs in the county, CNY Fair Housing conducted a series of undercover tests of the rental market. Testing is a recognized method for determining if discrimination is occurring which generally involves the use of a pair of testers who are similarly matched except for the protected class that is being tested. A total of 30 tests were conducted to provide a snapshot of the current state of fair housing conditions in the county. Three protected classes were examined – disability, familial status, and race. Twelve tests were performed over the phone and four were conducted on-site. Properties were tested within the towns of Potsdam, Canton, Massena, Ogdensburg, and Gouverneur.

The results of the tests are classified as no findings of discrimination, inconclusive, or findings of discrimination. The definitions for the classifications are:

No findings of discrimination – There were no results in the test and testers received similar treatment by the housing provider.

Inconclusive – There were results in the test, but we are unable to determine if it was based on the protected class or other factors (i.e. testers speaking to different agents, agents not forthcoming with information, testers not asking enough questions). Inconclusive results warrant additional testing to determine if there is any discrimination.

Findings on discrimination – There were definitive results in the test. The protected tester was denied housing or received different treatment that can be attributed to the protected class.

Disability - Reasonable Accommodation

There were five phone tests designed to test the housing provider's response to a request for a reasonable accommodation. A reasonable accommodation is a change in a landlord's rules, policies, or services that are necessary in order for the disabled person to have equal opportunity to use and enjoy a dwelling. The tester requested an accommodation to the "no pet policy" by allowing her to have her emotional support animal on the premises. **Results** – In one test there were findings of discrimination, in one test the unit was unavailable, and in three of the tests there were no findings.

Disability

There were five phone tests designed to test the housing provider's response to renting to a person with a mental disability. **Results** – In one test neither tester was able to make contact with the housing provider, in one test the unit was indicated as unavailable to both the protected and control tester, and in the other three tests there were no findings.

Familial Status

There were ten phone tests designed to test the housing provider's response to a family interested in renting their unit. Several of these calls were in areas that students typically rent in. **Results** – One of the tests had finding of differential treatment in which the agent said the unit was not for a family but she would still rent to the tester for a higher price. One test resulted in inconclusive results while the eight other tests had no findings.

Race

There were ten tests designed to test for discrimination based on race. We used female testers, in which the protected tester was African American and the control tester was Caucasian. **Results** – In all ten tests, there were no findings.

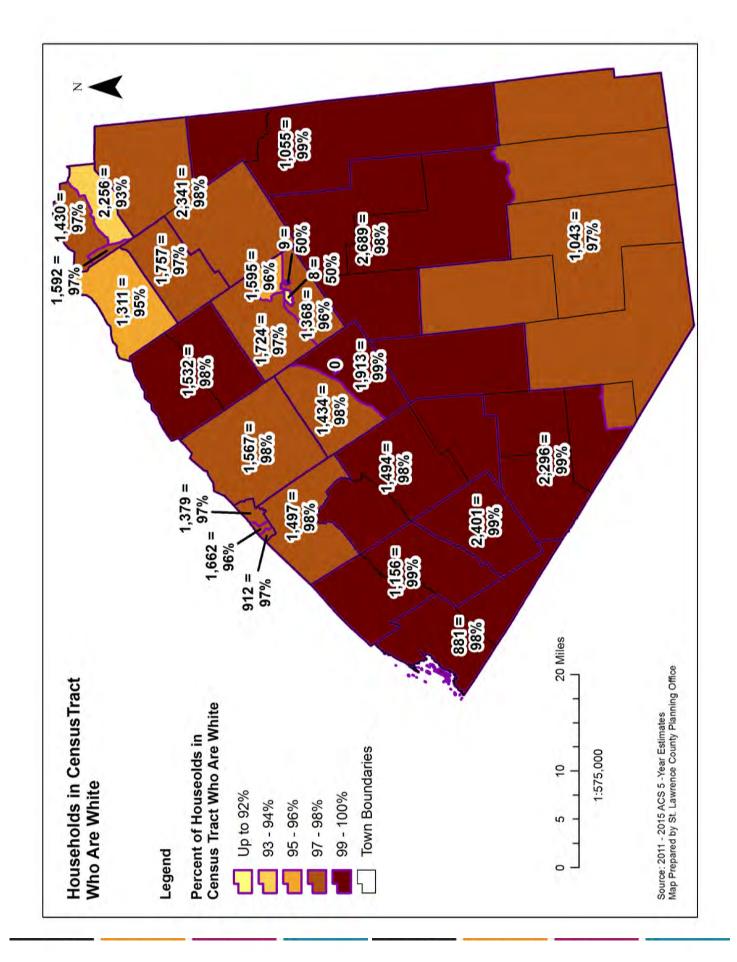
Overall, there were findings of discrimination in two out of thirty tests, a small portion of the overall tests.

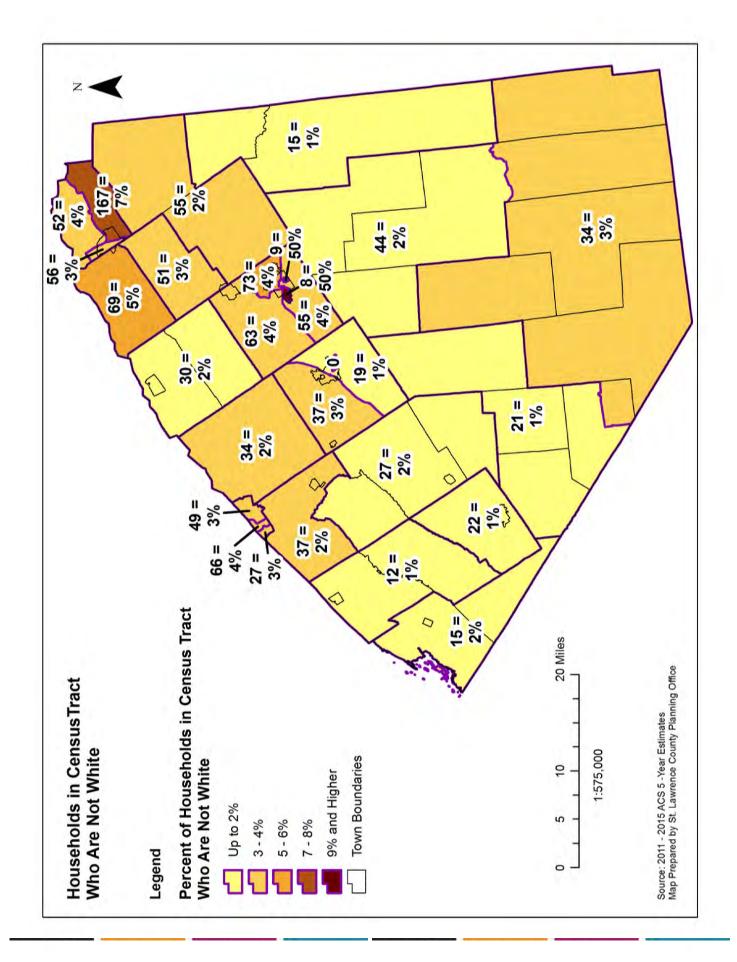
Fair Housing Goals and Priorities

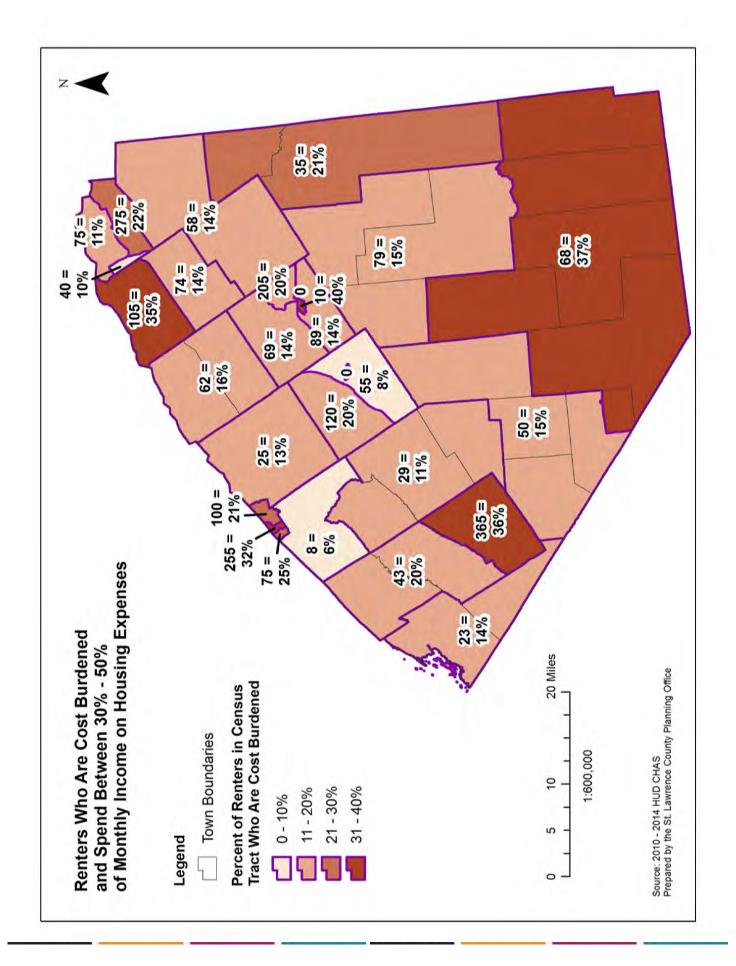
Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Make Codes Violations easier to enforce via a Municipal Ticketing Process or similar strengthening of codes enforcement mechanisms	Town Court Processes often are not set up for efficient handling of codes violations. It is difficult to enforce the penalties for codes violations even when they are found, especially for out of town landlords who use LLCs.	Poor codes enforcement leads to a degradation of housing stock, and poor living conditions for the most vulnerable residents of the county.	This section intentionally left blank.	This section intentionally left blank.
Improve living conditions via inspections on apartments with fewer units	Current rental registry laws leave gaps in which several units are not required to be inspected. Especially in rural areas, these apartments constitute a large sector of the rental housing stock.	A lack of proper inspections, especially when paired with a lack of codes enforcement, leads to poor housing conditions for the most vulnerable populations.	This section intentionally left blank.	This section intentionally left blank.
Increase Fair Housing Education for Government Planners and Officials	Through the Ogdensburg case, as well as the reaction at roundtables, it is clear there is more need for fair housing knowledge among elected officials and town planners.	Poor knowledge among those who need it most can lead to a lack of opportunity for protected classes, as well as legal trouble for municipalities.	This section intentionally left blank.	This section intentionally left blank.

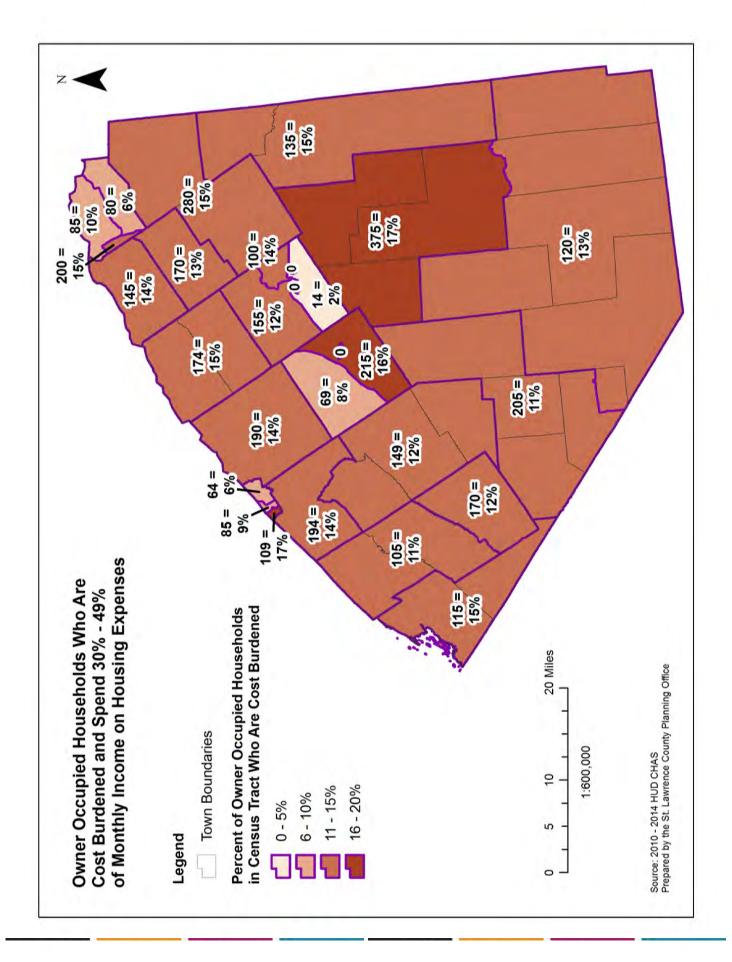
Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Increase Fair Housing Outreach and Education for Tenants and Service Providers	Lack of knowledge among service providers and tenants is a contributing factor in the lack of complaints seen by CNY Fair Housing.	A lack of fair housing law enforcement promulgates offences of fair housing laws. Especially at a time when the number of female headed households in poverty are increasing, all tenants and service providers should be able to take advantage of available resources to enforce fair housing rights.	This section intentionally left blank.	This section intentionally left blank.
Make applying for and obtaining funding for home improvement easier	Lack of technological skills, a complex process with many applications, and matching funding requirements make obtaining funds difficult.	Makes improving housing quality for most vulnerable residents much more difficult. Contributes to poor housing quality overall.	This section intentionally left blank.	This section intentionally left blank.
Create a preference on the Section 8 waiver list for victims of domestic violence and veterans	Disproportionate housing needs for low income women. A lack of knowledge of the process of setting up preferences.	Delays the acquisition of safe, affordable, quality housing for vulnerable protected classes	This section intentionally left blank.	This section intentionally left blank.

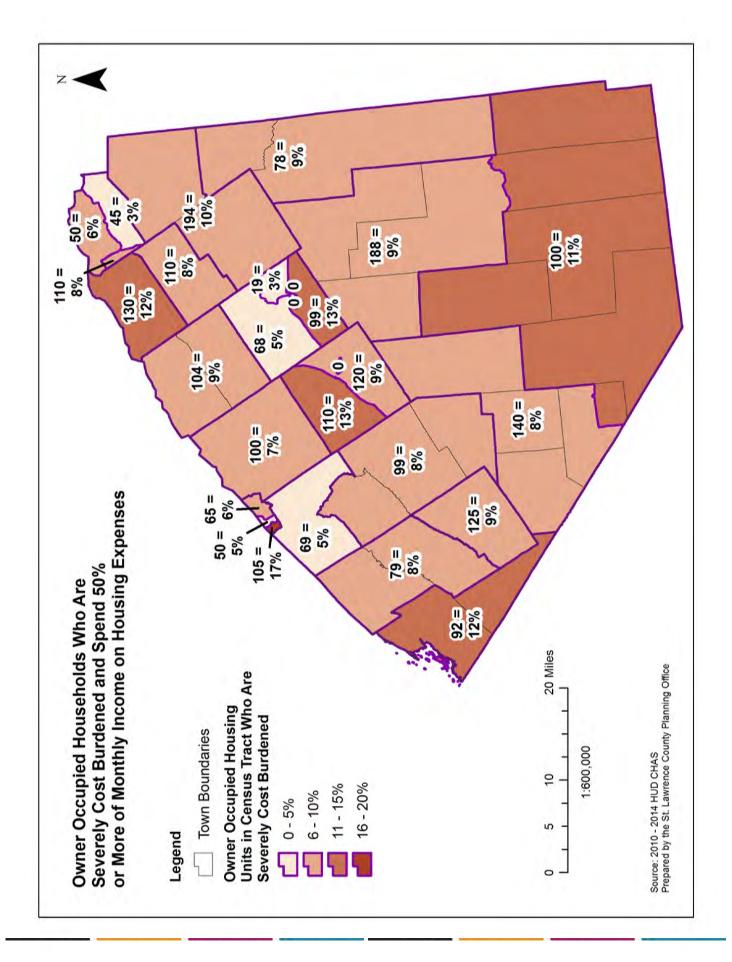
APPENDIX: MAPS

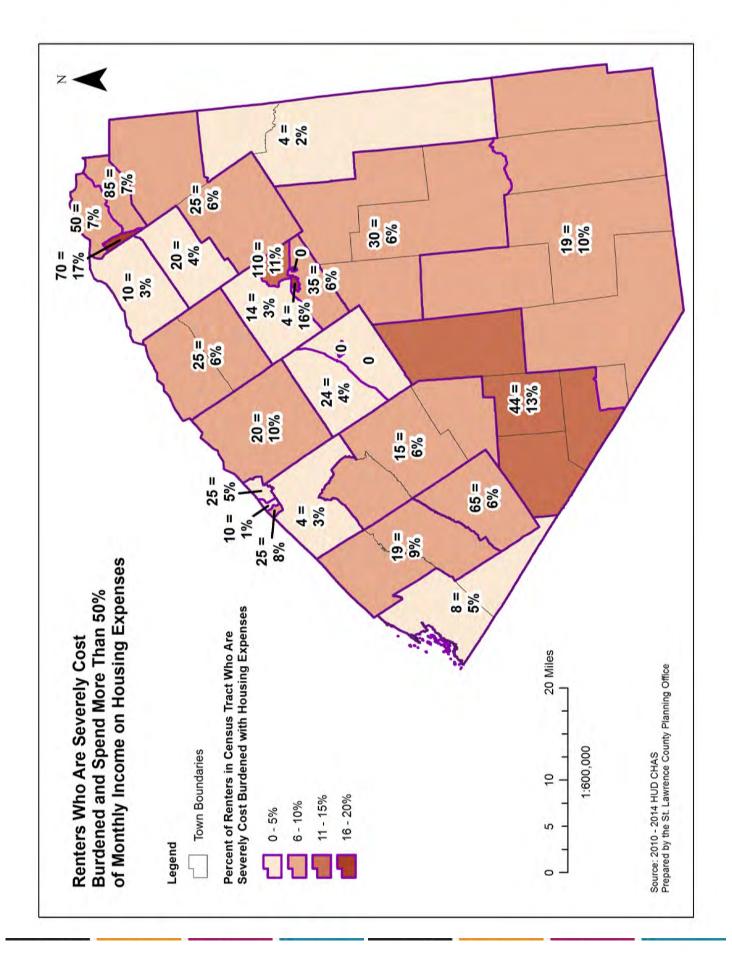


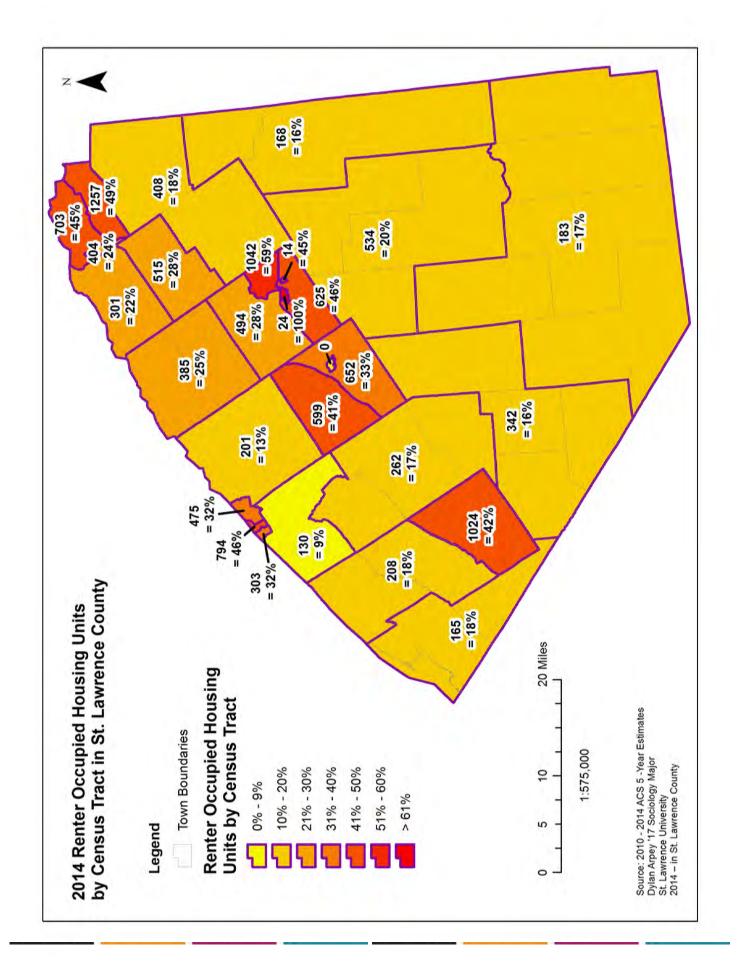


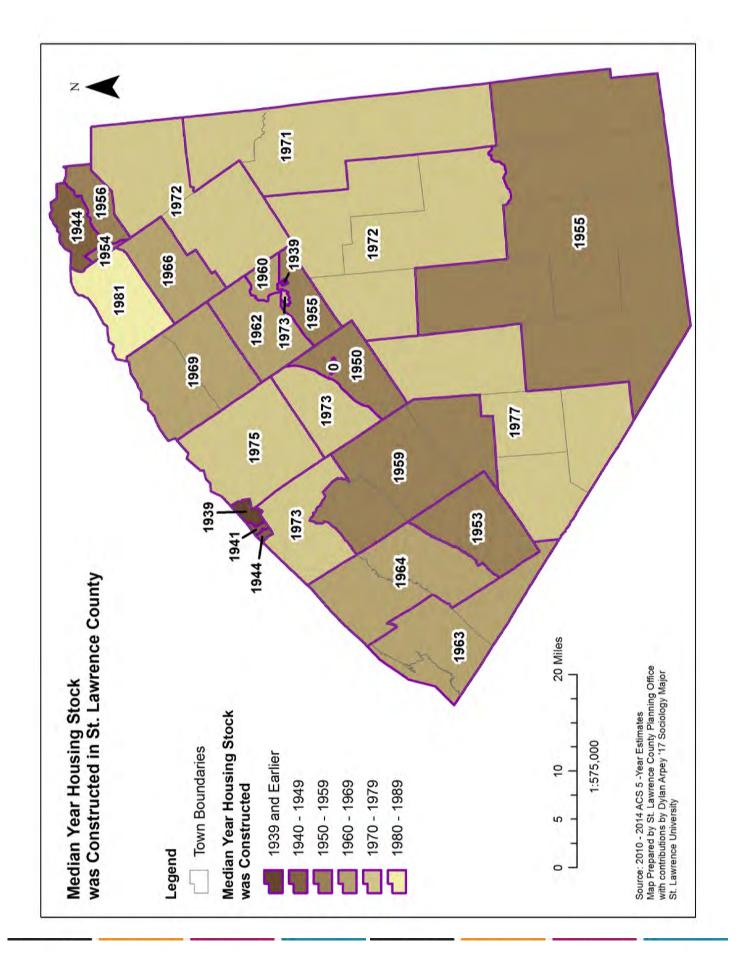


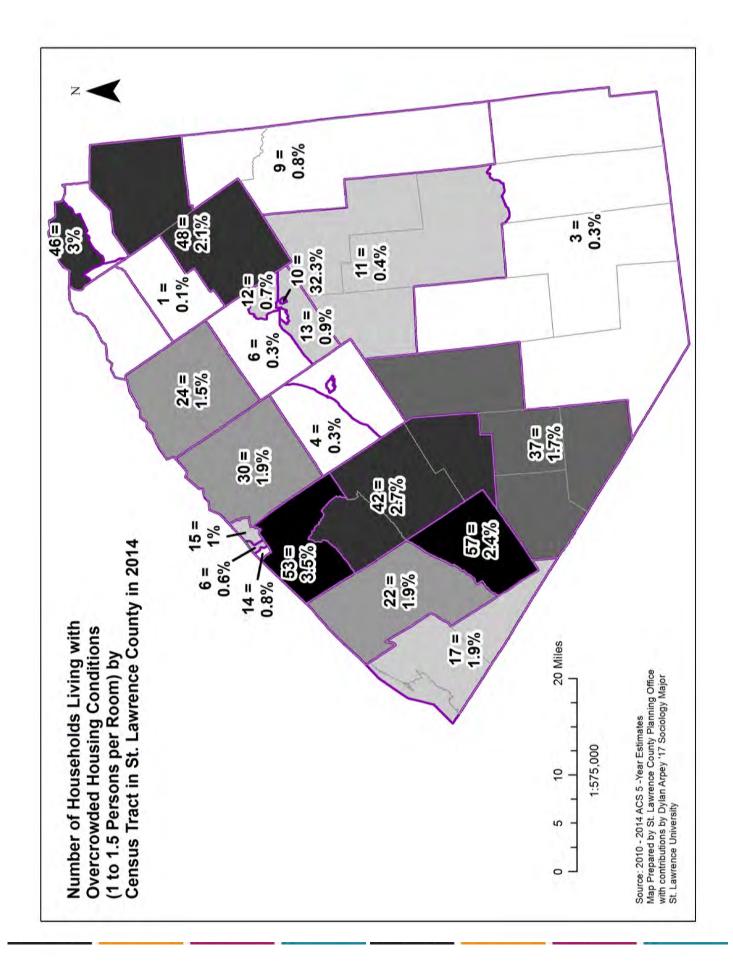


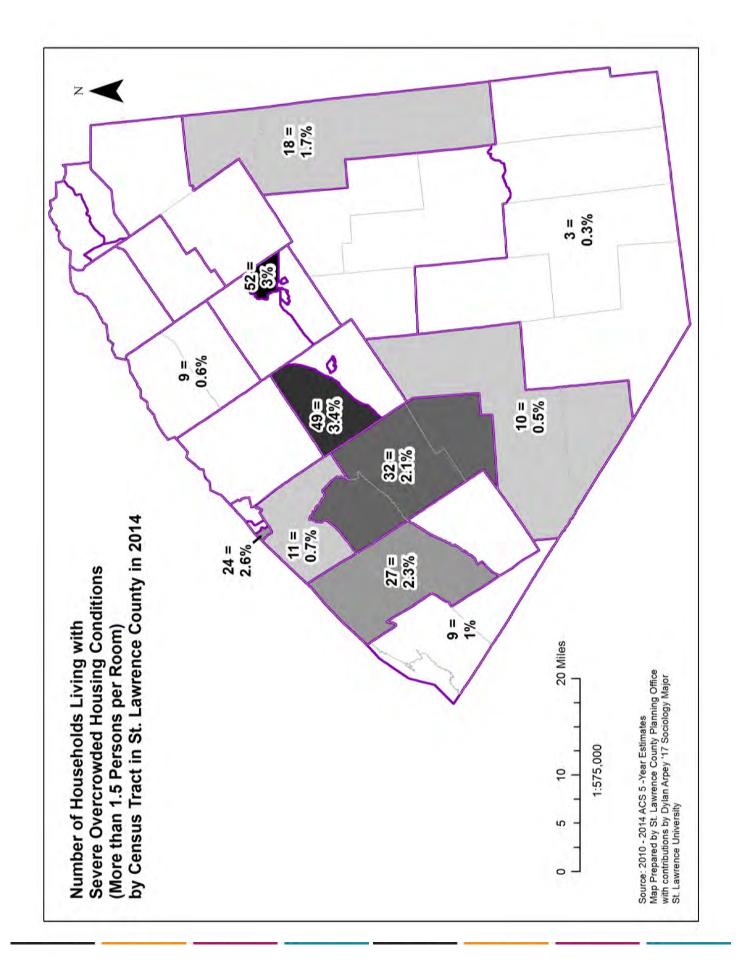


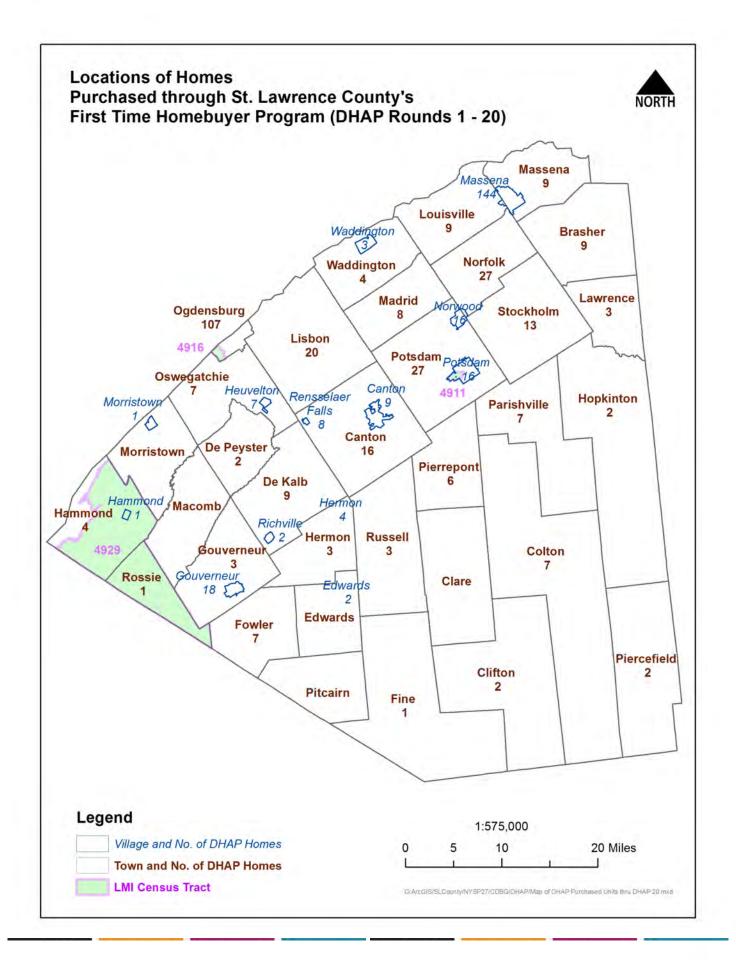


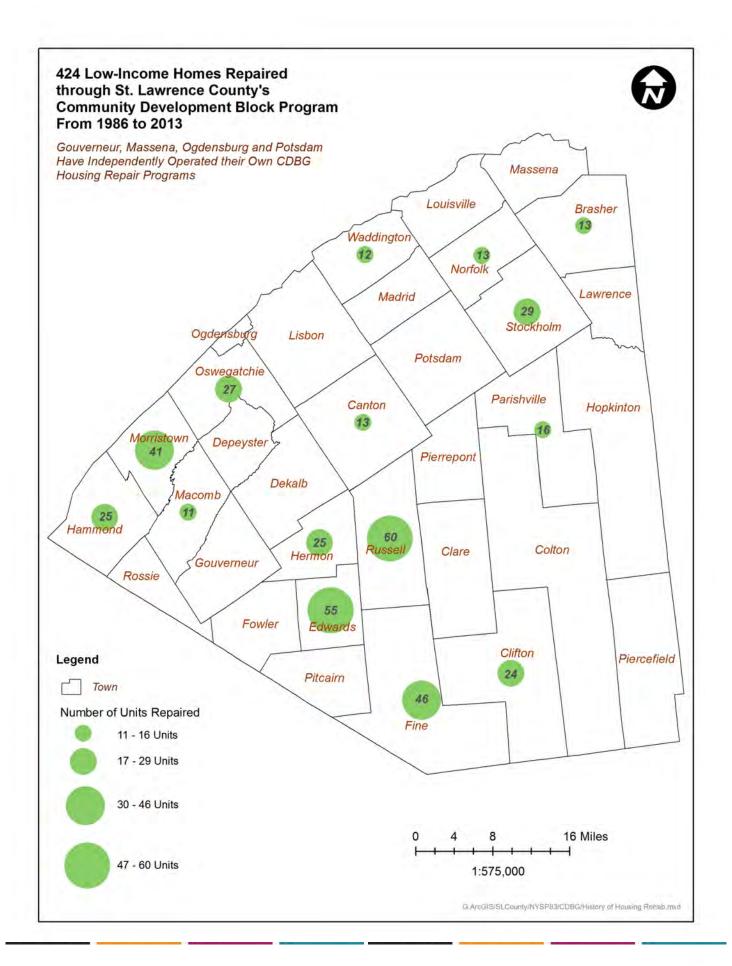


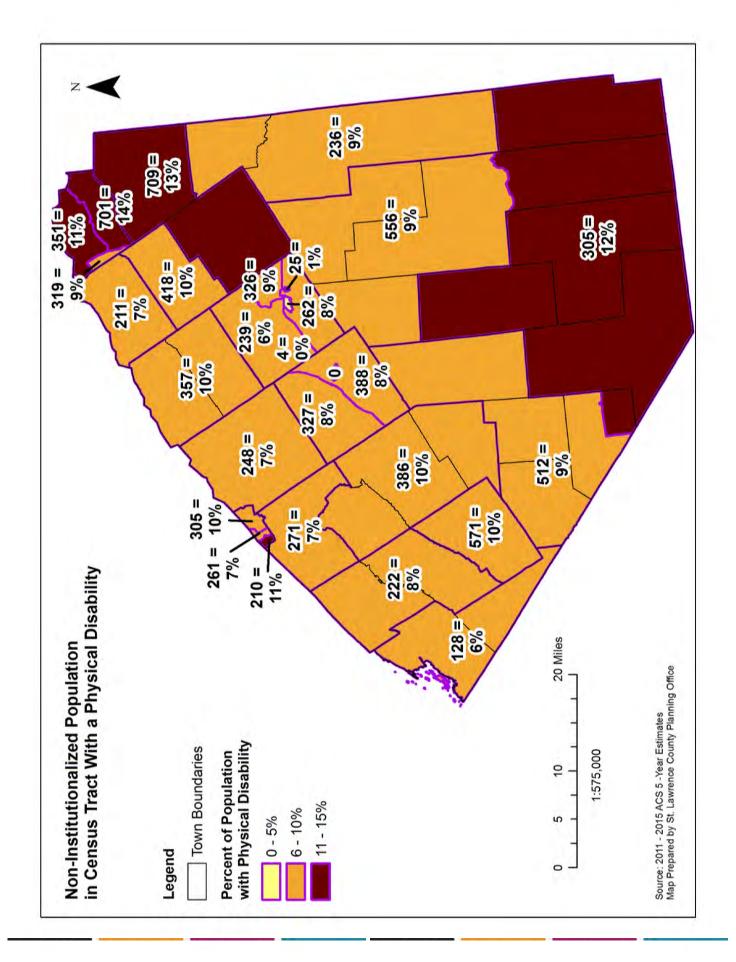


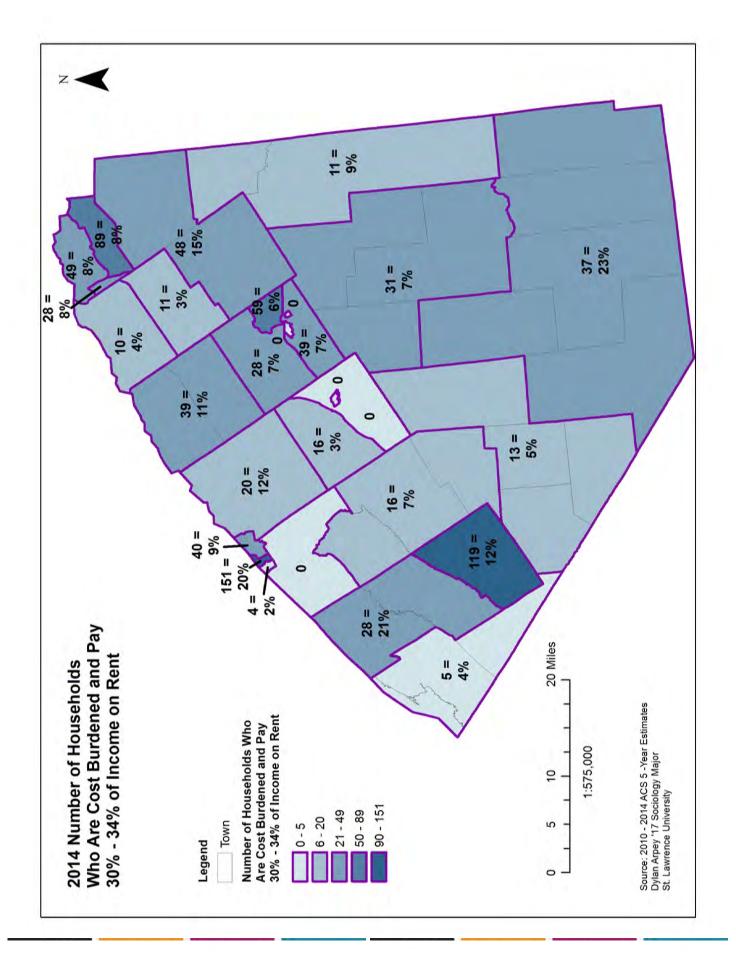


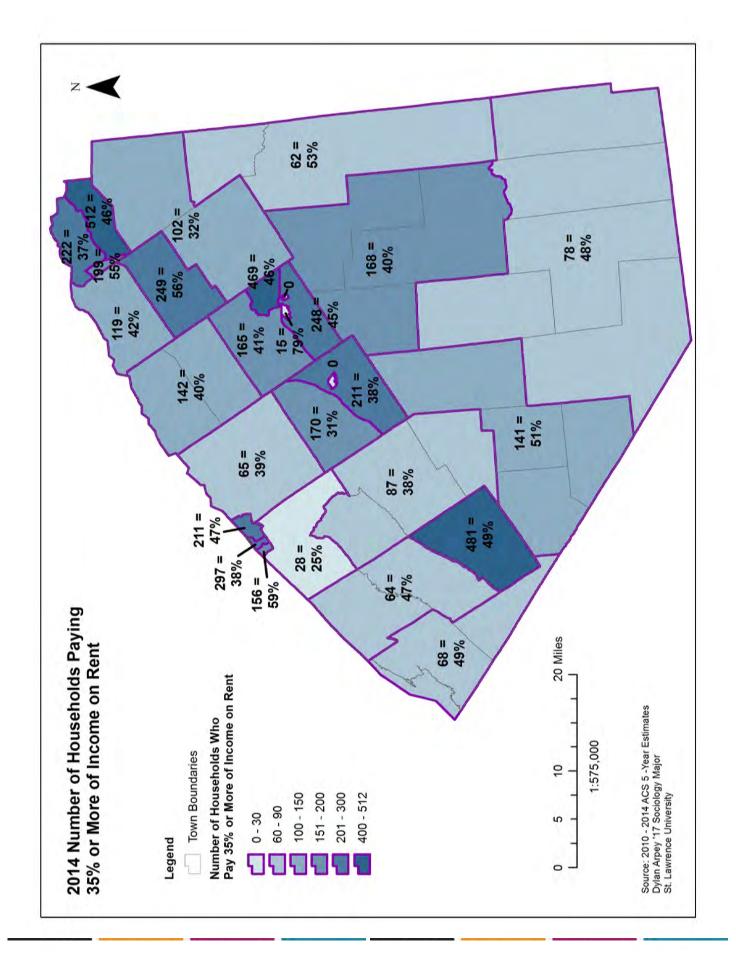


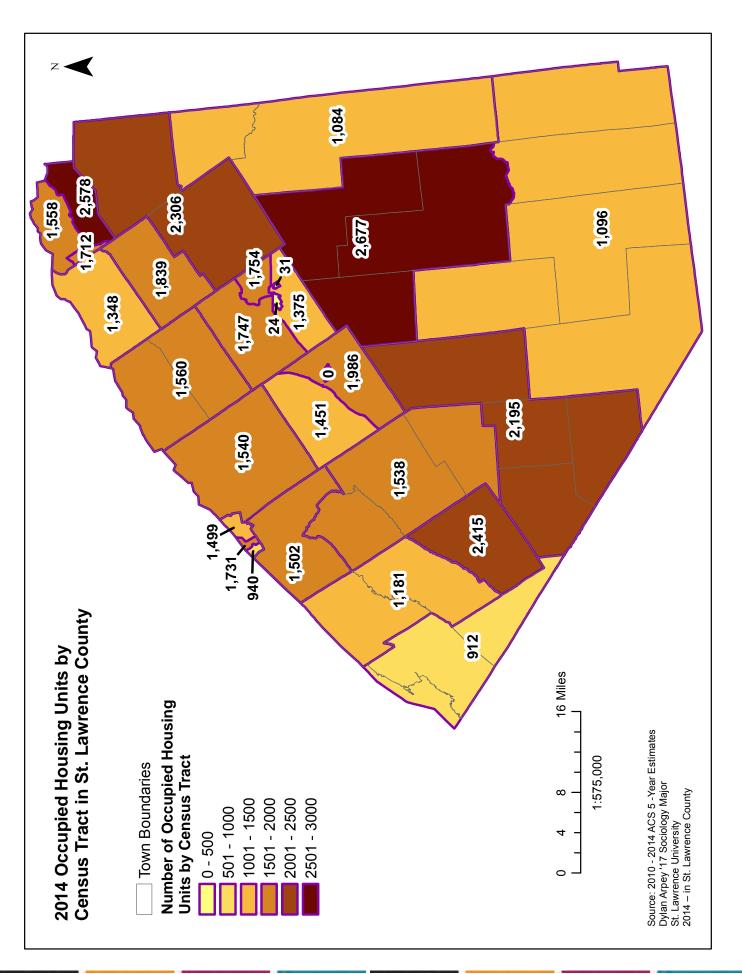


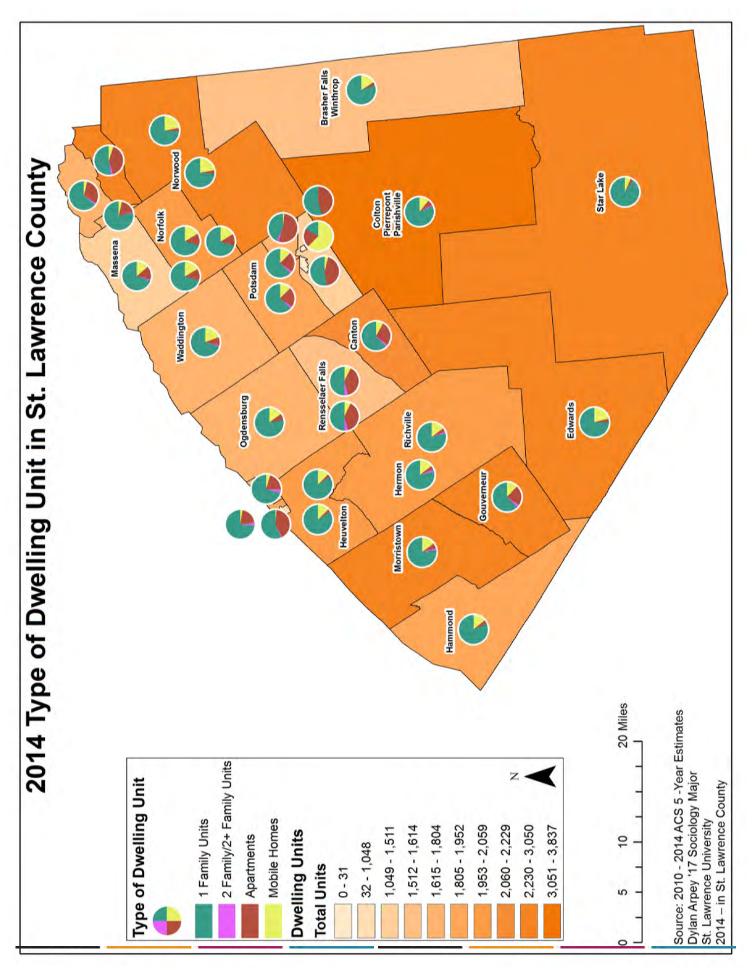


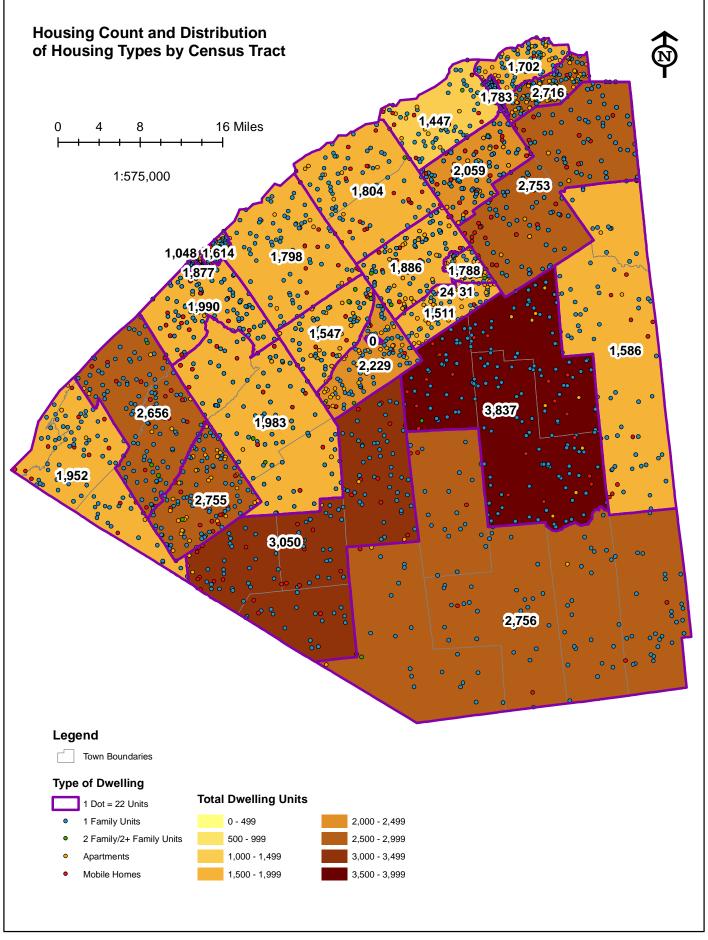


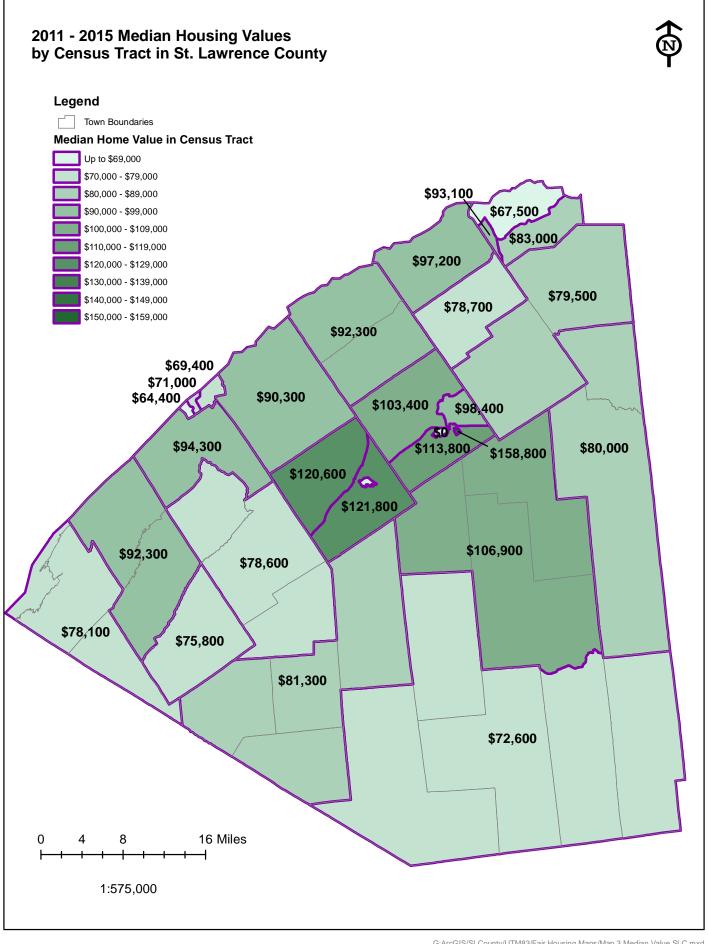


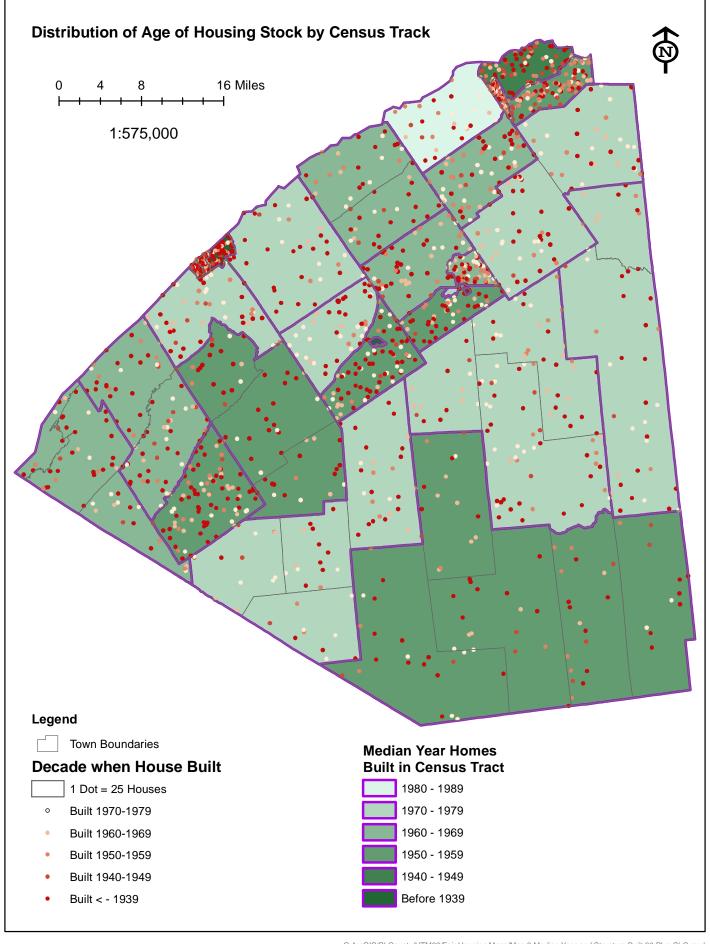


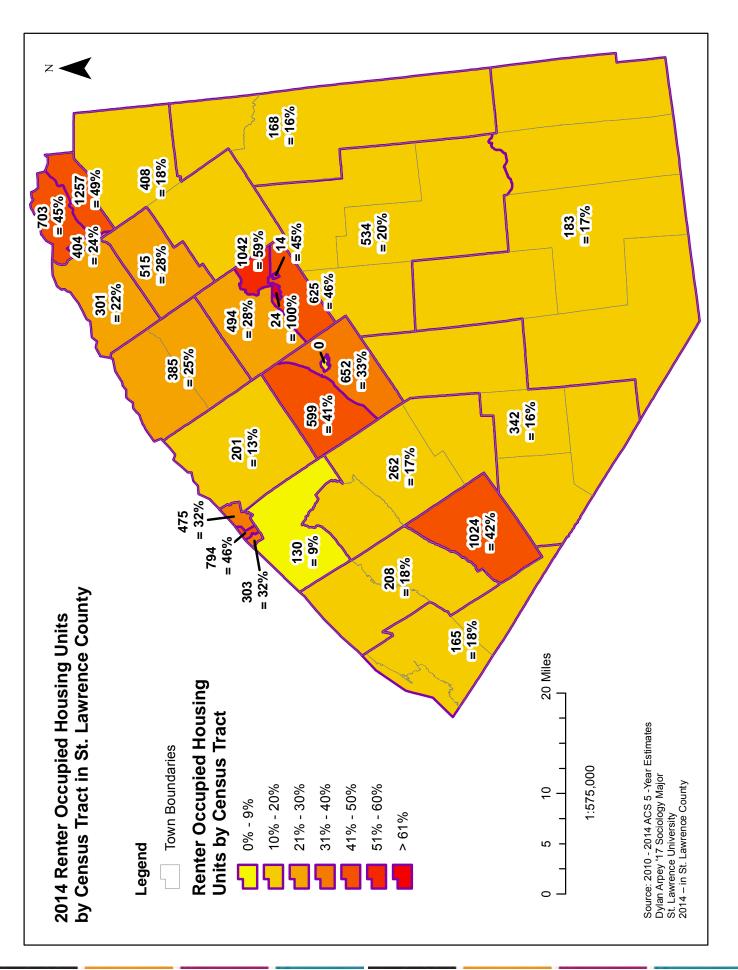


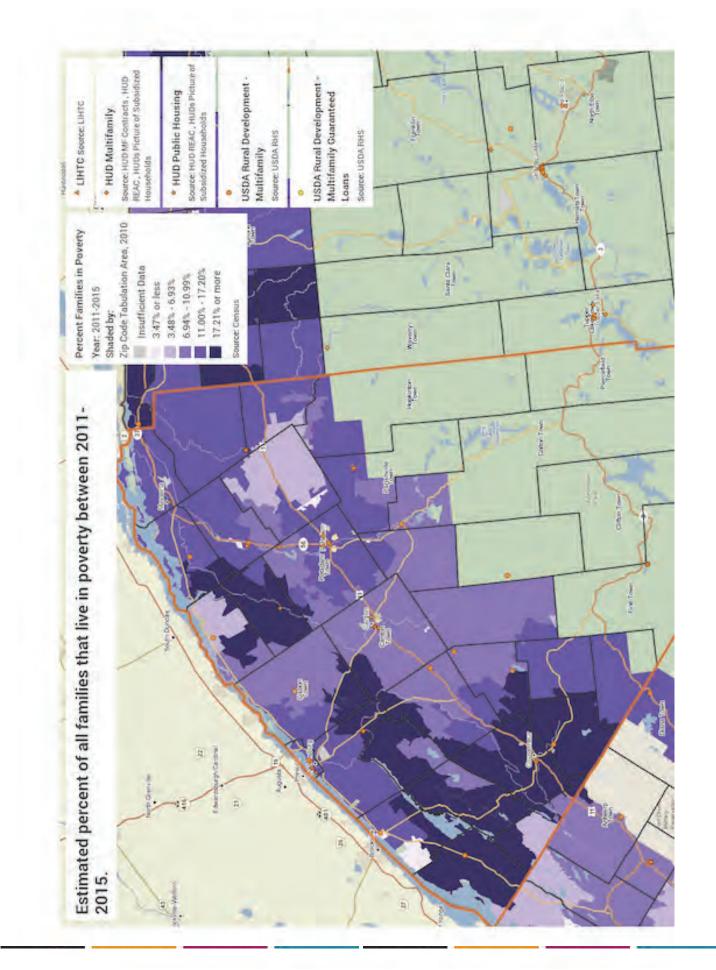


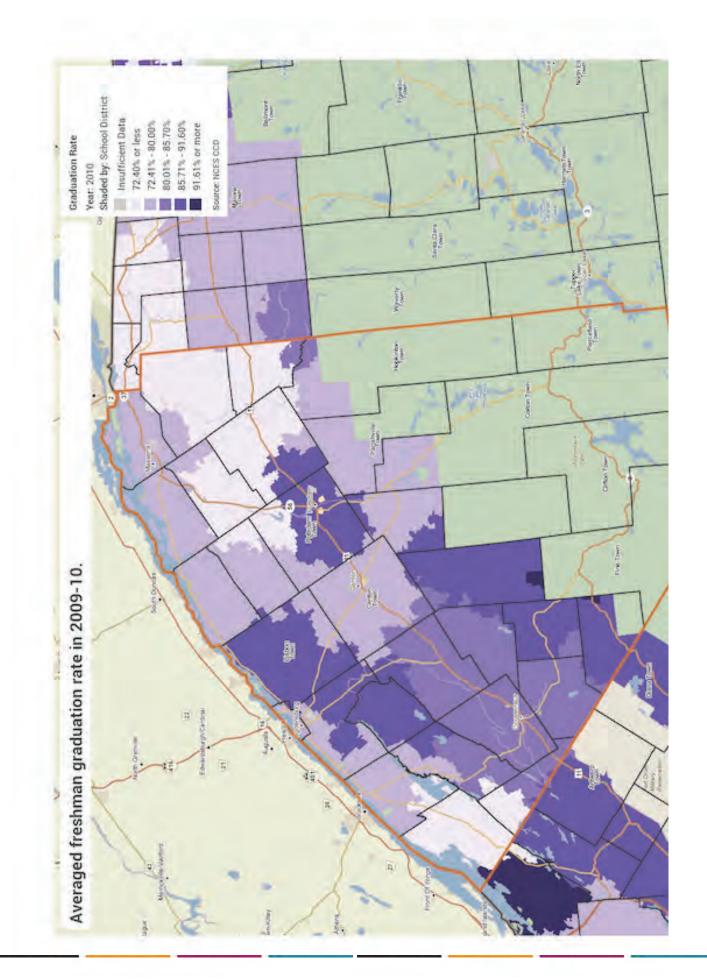


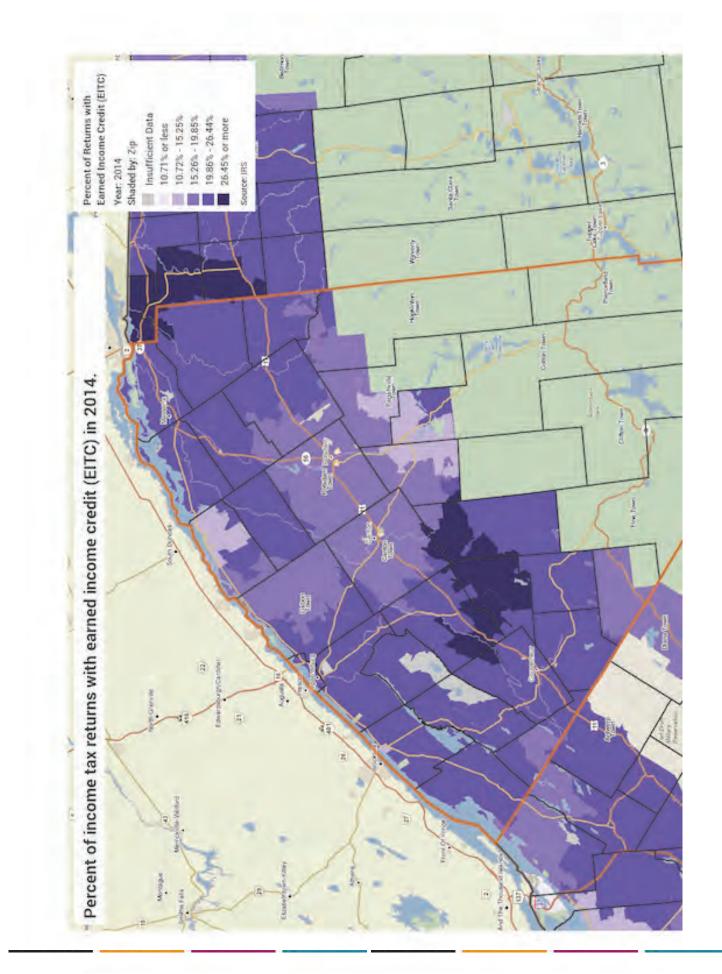


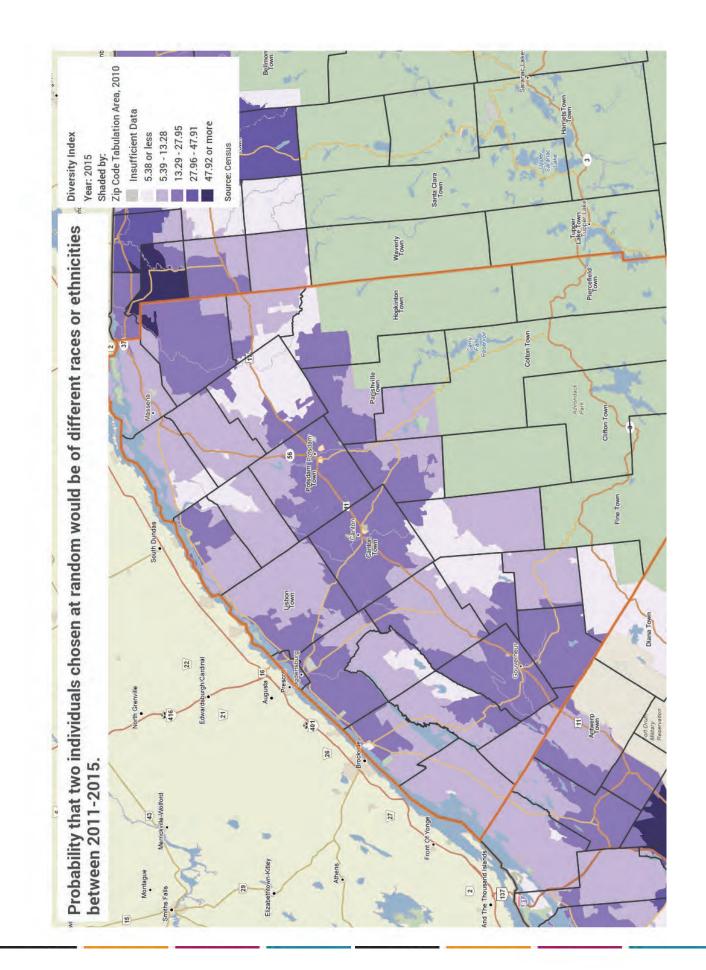


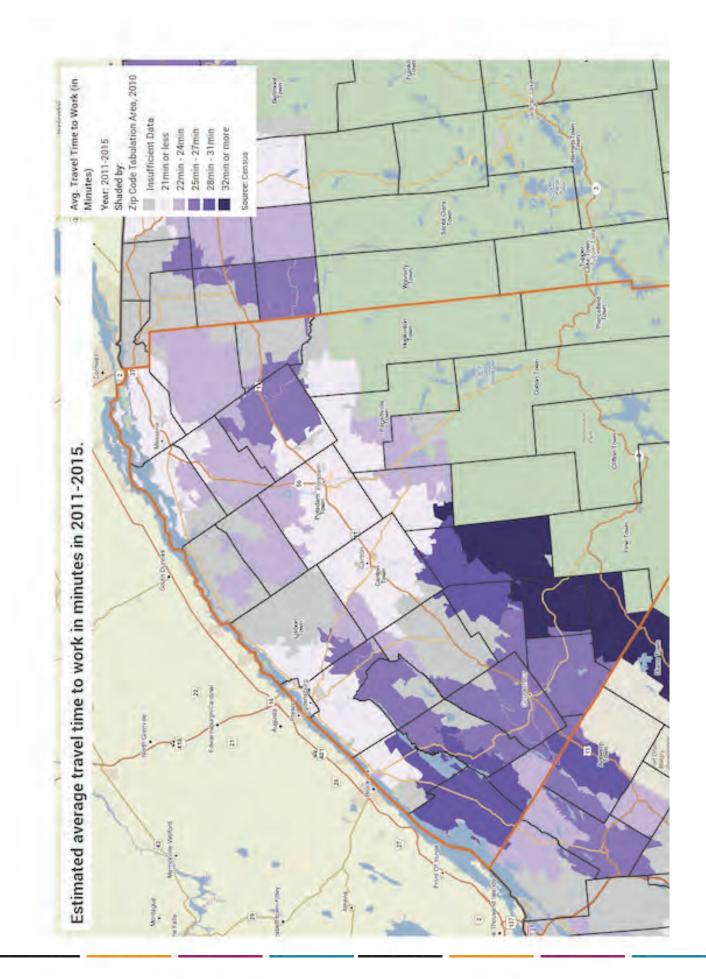


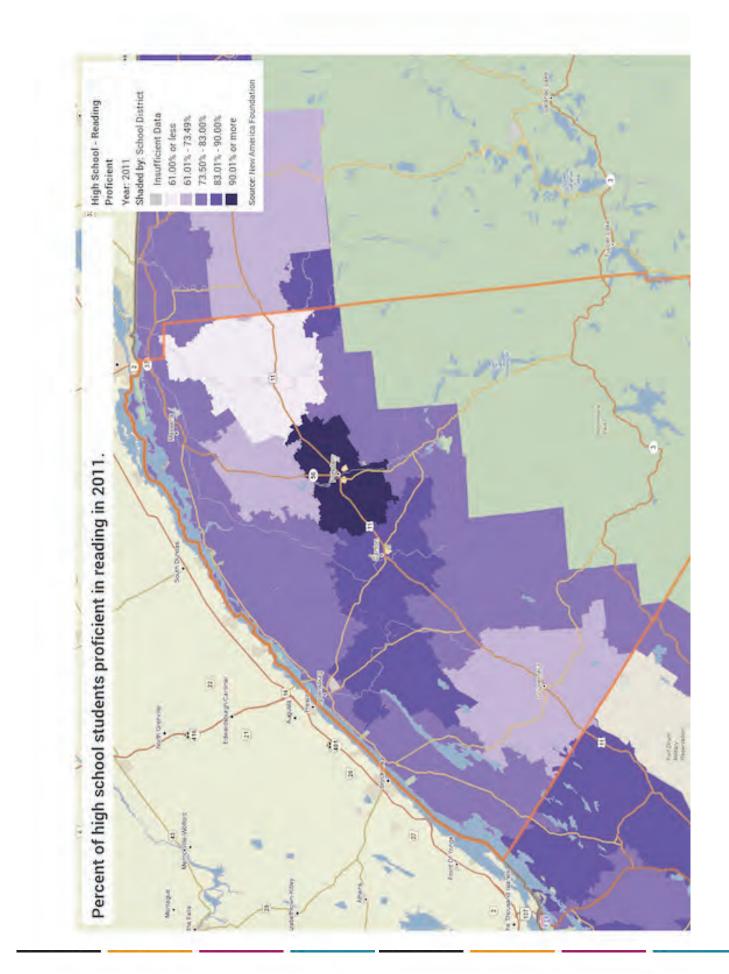


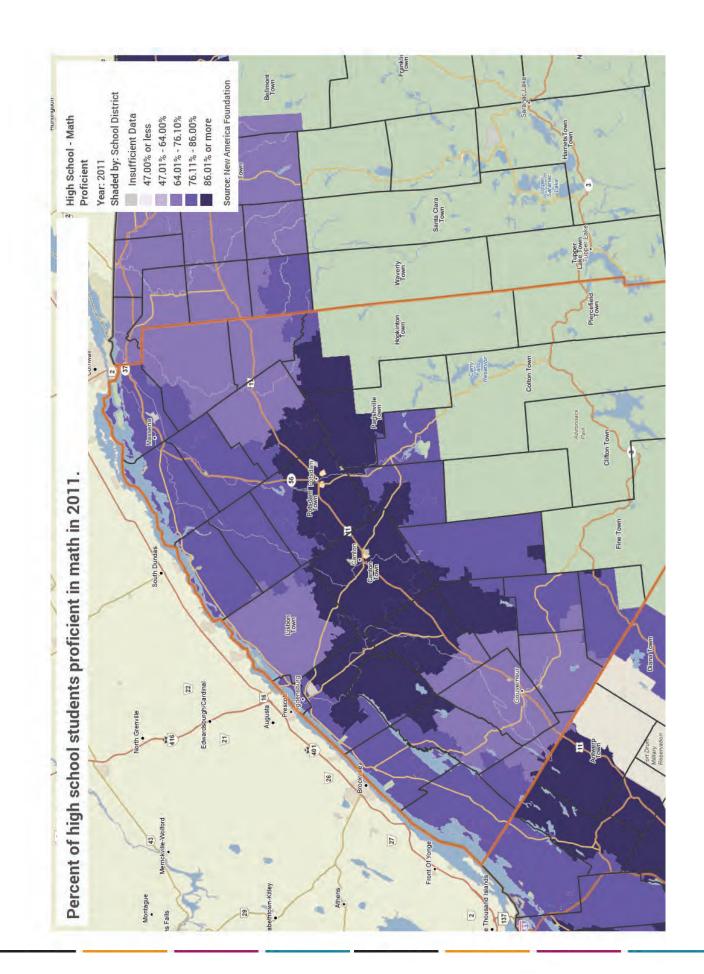












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