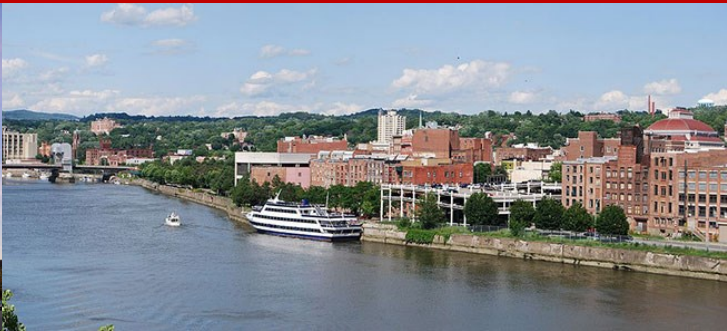


April 2022

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

TROY, NEW YORK



Prepared by:

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**Analysis of Impediments to
Fair Housing Choice
Troy, New York**

April 2022

Prepared for:



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1 INTRODUCTION

The Analysis of Impediments to Fair Housing Choice (AI) is required by the U.S. Department of Housing and Urban Development (HUD) communities receiving federal housing and community development funds such as Community Development Block Grant (CDBG), HOME, and Emergency Shelter Grant (ESG) funding. The overall goal of the AI is to review and assess impediments to fair housing within the City of Troy, New York. 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 of Troy's AI was prepared in conjunction with required outreach, consultation, and coordination among various government agencies, private/nonprofit groups, public service agencies, City staff, and individuals. A list of participants in the AI is shown in the following Introduction section.

According to the City's 2010 Analysis of Impediments to Fair Housing, the primary federal resources for the City were 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). RKG requested the City's federal funding allocation information between 2016 and 2020 from the City of Troy during July, August, and September of 2021 and received them for review in December 2021.

The total subsidies that the Troy Housing Authority received from sources such as HUD and other government grants between January 1, 2020, and December 31, 2020, were around \$16 million, which includes \$11 million for the Section 8 program and \$5 million for project-based housing programs.

The AI consists of seven chapters, including:

1. Introduction
2. Purpose and Need for the Study
3. Demographic and Housing Condition Analysis
4. Records of Housing Discrimination
5. Review of Public Sector Policies
6. Review of Private Sector Practices, and
7. Impediments to Fair Housing Choice

Though several of the impediments identified in this report are beyond the direct control of the City of Troy, the City bears responsibility for identifying these issues and developing strategies to ensure that its housing market is as open and inclusive as possible. The impediments to fair housing choice identified in this report include the following, explained in detail in Section 7.

Impediments to Fair Housing Choice:

- Demand Exceeds Supply for Section 8 Vouchers,
- There is a Limited Capacity to Increase Supply of Affordable Housing in the City,
- There are Concentrations of Minority Populations in Lower-Income Areas with Limited Access to Resources and Opportunities,
- There is Limited Access to Resources and Opportunities in Publicly Supported Housing Neighborhoods,
- There are Housing Condition Problems in Some Neighborhoods,
- Lending Policies and Practices,
- There is a Shortage of Affordable Homeownership Housing,
- There is a Shortage of Affordable Rental Housing,
- There is a Limited Supply of Supportive Housing and Services for Persons with Disabilities and People with Mental Health/Substance Abuse Issues, and
- A Need for Increased Fair Housing Education and Encourage Real Estate Sales and Property Management Companies to Include Fair Housing Language in Real Estate Listings.

2 PURPOSE AND NEED FOR THE STUDY

Title VIII of the Civil Rights Act of 1968 (and its 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 disabilities.

The U.S. Department of Housing and Urban Development (HUD) encourages that all recipients of federal funds under the Community Development Block Grant Program (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 includes conducting an analysis to identify impediments to fair housing choice within the jurisdiction. The City of Troy receives CDBG, HOME, and ESG funds annually and is encouraged to update its Analysis of Impediments to Fair Housing Choice (AI).

On June 10, 2021, HUD issued an interim final rule (IFR) entitled Restoring Affirmatively Furthering Fair Housing Definitions and Certifications. This rule went into effect on July 31, 2021, whereby it shall: (1) restore certain definitions and certifications pertaining to the Fair Housing Act's requirement to affirmatively further fair housing (AFFH), (2) create a voluntary fair housing planning process where HUD provides technical assistance to grantees seeking such support, (3) not require any specific fair housing planning or submission to support AFFH certifications, (4) allow program participants to voluntarily engage in fair housing planning by conducting or updating an Assessment of Fair Housing (AFH) or an Analysis of Impediments to Fair Housing Choice (AI), continuing to implement an AFH or AI, or engaging in some other form of fair housing planning, (5) support AFFH voluntary efforts through resources such as the AFH assessment tools and HUD's Data and Mapping Tool (AFFH-T) which can be found at www.hud.gov/affh. HUD's AFFH page also provides fact sheets, an AFFH Guidebook, and Fair Housing Planning Guides' Volume 1 and Volume 2 and (6) while not required, fair housing plans may be voluntarily submitted for FHEO feedback and technical assistance.

The purpose of this study is to conduct an independent Analysis of Impediments (AI) in accordance with HUD regulations under 24 CFR 570.904(c)(1). The City is committed to furthering fair housing choices within the Troy, NY city limits.

A. PREPARATION OF THE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

The City of Troy principally administers its housing and community development programs through the Housing and Community Development Department. The Department administers the U.S. Department of HUD's entitlement program for the City of Troy, which includes the following: the Community Development

Block Grant (CDBG), the Emergency Solutions Grant program (ESG), and the Home Investment Partnerships Program (HOME). It is also the lead agency for producing the Analysis of Impediments to Fair Housing Choice. The AI was prepared by RKG Associates, Inc. of Alexandria, Virginia, a planning, economic, and real estate advisory firm working on behalf of the City of Troy.

B. PARTICIPANTS IN THE ANALYSIS OF IMPEDIMENTS

The City of Troy's Analysis of Impediments to Fair Housing Choice included input from city officials and key persons involved in the housing and community development department and affiliated service providers and nonprofit organizations. In conducting the AI, the consultant collaborated with individuals and organizations that represent the interests of protected groups. Participants included:

- City of Troy Housing and Community Development Department,
- CARES of NY, Inc.,
- Habitat for Humanity Capital District,
- Independent Living Center of the Hudson Valley,
- Joseph's House and Shelter, Inc.,
- Roarke Center,
- Salvation Army,
- Troy Area United Ministries (TAUM),
- Troy Rehabilitation and Improvement Program, Inc.,
- YWCA of Greater Capital Region,
- Troy Housing Authority,
- New York State Division of Human Rights, and
- U.S. Department of HUD Buffalo New York Field Office.

C. METHODOLOGY

This analysis includes a combination of quantitative and qualitative research. RKG Associates obtained data from The Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD), 2019 American Community Survey 5-Year Estimates (provided by the U.S. Census Bureau), the 2010 Census, ESRI, a private supplier of geographic information system software and data, the Home Mortgage Disclosure Act (HMDA), and relevant reports published by various local agencies. The qualitative component includes interviews with agency staff and others involved in the provision of fair housing and/or related services in the Troy area.

3 DEMOGRAPHIC AND HOUSING ANALYSIS

A. INTRODUCTION

This section examines the existing demographic and housing characteristics of the City of Troy, New York by census tract and on the city level. It uses the categories, indexes, and data from the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) developed by the Department of Housing and Urban Development (HUD). Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal grantees further the purposes of the Fair Housing Act, and the AFFH Data and Mapping Tool provides a uniform system for HUD grant recipients to follow to assess their efforts and challenges they have in such compliance.

The following analysis provides an overview and insights into seventeen demographic and housing topics included in the latest AFFH-T raw data. The latest data version that the RKG team used is Version AFFHT0006, dated July 2020. Also, the analysts complemented the study with population, racial and ethnic composition, household, and household income data for 2010 and 2019 obtained from the American Community Survey 2010 and 2019 5-year Estimates, and 2025 projections obtained from ESRI, an international supplier of geographic information system software and data, as well as the Decennial Census.

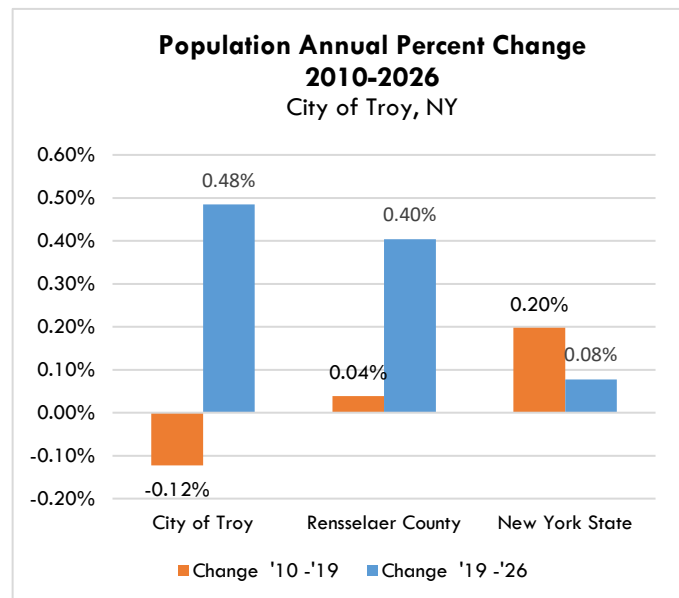
B. POPULATION, HOUSEHOLDS, AND HOUSEHOLD INCOME TRENDS

1. Population Trends

The City of Troy's population was estimated at 49,458 people in 2019, which accounted for 31.1% of the County's population of 159,185. Note that this study was conducted before the 2020 Census results are available, and the U.S. Census Bureau 2020 Census estimated that the population was 51,401 in Troy in 2020. The City has slightly decreased its share of the County's population since 2010 but is projected to stabilize its share at 31.2% by 2026.

Unlike Rensselaer County or the State of New York, the City experienced a slight decline in its population (loss of 553 people, 0.12% annually) between 2010 and 2019, while the County and the State saw population growth. The City's population is projected to grow back (an increase of 1,678, 0.48%

Figure 3-1



Source: ACS, ESRI and RKG Associates, Inc., 2021

Table 3-1

Population Trend, 2010-2026

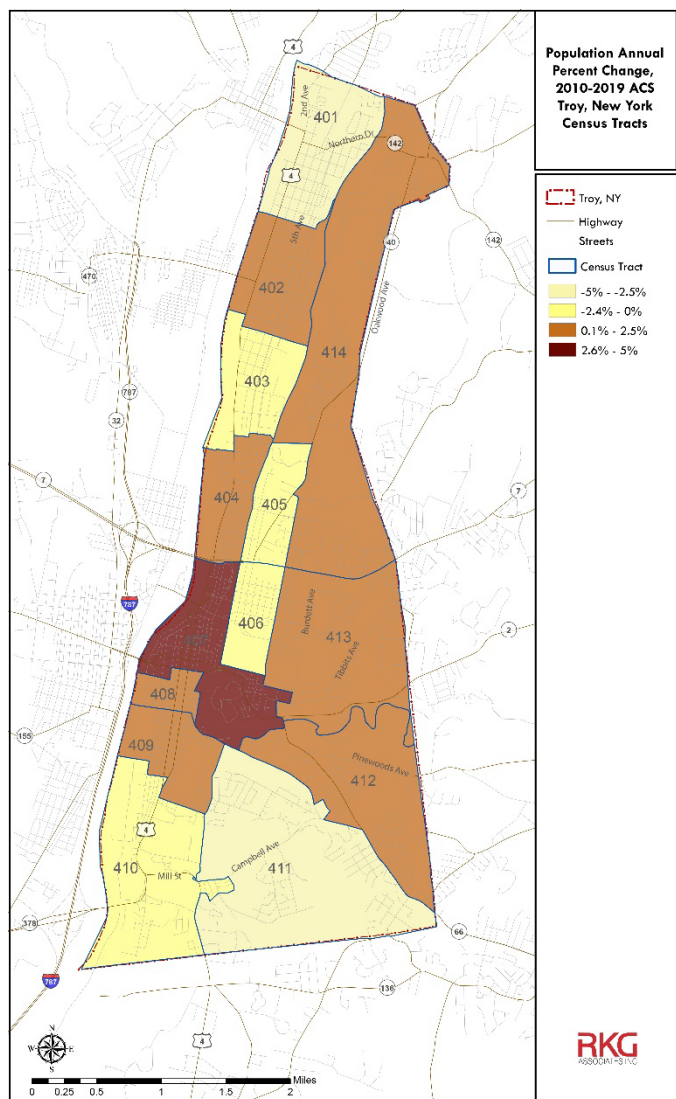
City of Troy, Rensselaer County, and State of New York

	2010	2019	2026	Change '10 -'19		Change '19 -'26	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Troy	50,011	49,458	51,136	(553)	-0.12%	1,678	0.48%
Rensselaer County	158,629	159,185	163,684	556	0.04%	4,499	0.40%
New York State	19,229,752	19,572,319	19,678,859	342,567	0.20%	106,540	0.08%

Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

annually) between 2019 and 2026, a slightly faster pace than the County (0.40% annually) and the State (0.08% annually) (Figure 3-1/Table 3-1). Among the 14 census tracts within the City of Troy, six experienced a population decrease between 2010 and 2019, and similar losses are projected to continue through 2025. Census Tract 407 saw the fastest population growth between 2010 and 2019, which is the downtown area situated between New York State Highway 7 and New York State Highway 2 along the western waterfront, generally overlapping with the City's cluster of businesses, government offices, and major employers including Russell Sage College, Troy Downtown Marina, United States Postal Office, and the Rensselaer County Department of Motor Vehicle (Map 3-1).

Map 3-1

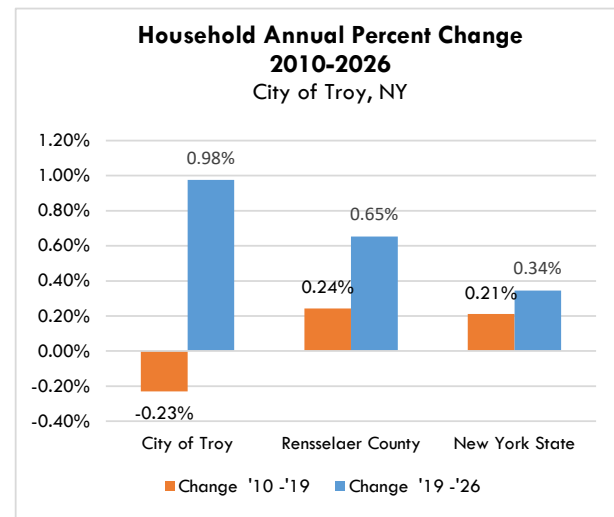


2. Household Trends and Household Size

The household changes between 2010 and 2019 in the City of Troy, Rensselaer County, and the State of New York all follow a trend somewhat like the population growth, while the City's households dropped at a faster rate than the population, as the average household sizes in the three areas are all decreasing (Figure 3-2).

The City of Troy has a smaller household size (2.25 per household) than both the County (2.36 person) and the State (2.59 persons) in 2019 (Table 3-2). This finding resonates with the national trend and is usually associated with the aging population and the increase of empty-nesters, as well as more people choosing to postpone having children or not to have children at all.

Figure 3-2



Source: ACS, ESRI and RKG Associates, Inc., 2021

Table 3-2

Household Trend, 2010-2026

City of Troy, Rensselaer County, and State of New York

	2010	2019	2026	Change '10 -'19		Change '19 -'26	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Troy	20,318	19,899	21,259	(419)	-0.23%	1,360	0.98%
Rensselaer County	63,518	64,906	67,872	1,388	0.24%	2,966	0.65%
New York State	7,205,740	7,343,234	7,520,525	137,494	0.21%	177,291	0.34%
Average Household Size							
City of Troy	2.30	2.25	2.18	N/A	N/A	N/A	N/A
Rensselaer County	2.43	2.36	2.32	N/A	N/A	N/A	N/A
New York State	2.59	2.59	2.54	N/A	N/A	N/A	N/A

Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

3. Median Household Income

The median household income in the City of Troy has been lower than both the County and the State levels since 2010 and has been growing at a slower rate of 2.74% annually than the County but slightly faster than the State over the past decade. The City's median household income was \$45,728 in 2019, which is only 66% of the County level of \$68,991 and is projected to remain so through 2026 (Table 3-3). The census tracts with the highest median household incomes within the City are on the east side of the City (east of The Uncle Sam Bikeway) and south of New York State Highway 2, especially Census Tract 412 (Map 3-2). All census tracts have experienced an increase in the median household income between 2010 and 2019 except for Census Tract 402. Census Tracts 406, 408, and 410 have seen the fastest annual growth in their median household incomes, which are adjacent to the downtown area on the west side of the City along Route 4. In particular, Census Tract 406 has seen the fastest annual median household income growth at 8.66% between 2010 and 2019, and it overlaps with the Rensselaer Polytechnic Institute. In addition, census tracts south of New York State

Highway 2 have generally seen faster median household income growth than the north side of the City (Map 3-3).

Table 3-3

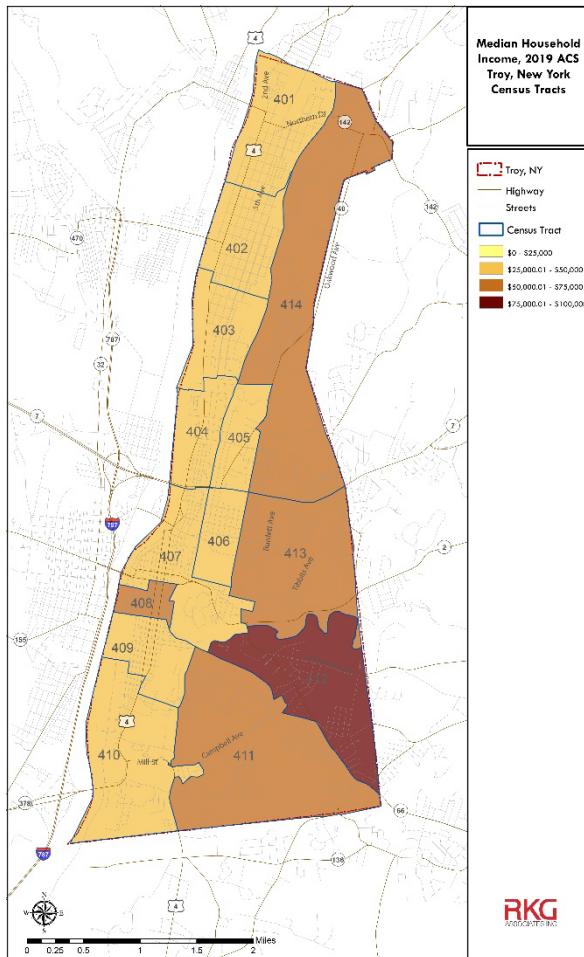
Median Household Income Trend, 2010-2026

City of Troy, Rensselaer County, and State of New York

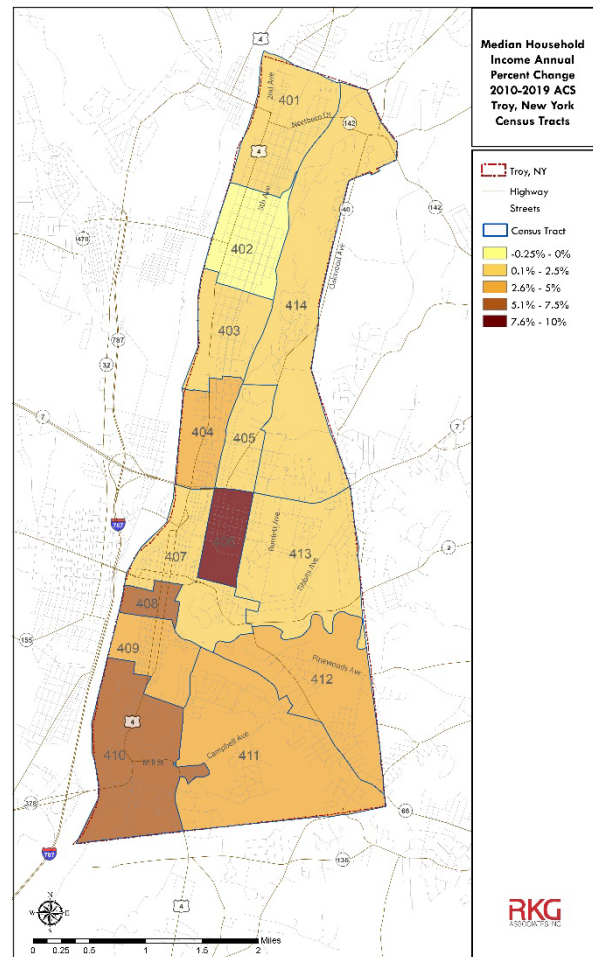
	2010	2019	2026	Change '10 - '19		Change '19 - '26	
				Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
City of Troy	\$36,675	\$45,728	\$50,595	\$9,053	2.74%	\$4,867	1.52%
Rensselaer County	\$54,152	\$68,991	\$77,939	\$14,839	3.04%	\$8,948	1.85%
New York State	\$55,603	\$68,486	\$80,540	\$12,883	2.57%	\$12,054	2.51%

Source: American Community Survey 2019 5-Year Estimates, ESRI and RKG Associates, Inc., 2021

Map 3-2



Map 3-3



C. RACE AND ETHNICITY

1. Racial/Ethnic Trends and Composition

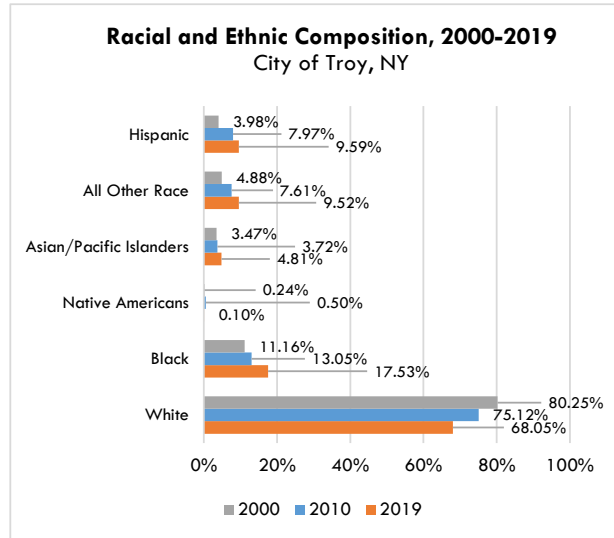
The City's White population accounted for the largest share (68.1%) of the population in 2019, followed by the African American population at 17.5%, and the Hispanic population at 9.6% (Figure 3-3). It should be noted that the term "Hispanic" does not refer to a racial group. The U.S. Census Bureau uses the ethnonyms "Hispanic or Latino" to refer to "a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race" and states that Hispanics or Latinos can be of any race, any ancestry, any ethnicity¹.

The Native American population represented 0.1% of the City's population in 2019, which was lower than the share on the national level at 1%.

The White population saw a drop between 2000 and 2019, but all Non-White Minority racial and ethnic groups experienced population gains during the same decade, especially the people of Hispanic ethnicity and people of All Other Race. Proportionally, all Minority (Non-White) groups also saw a steady rise in their population share during this decade, while the White population share reduced from 80.3% to 68.1% due to a loss of this population.

In comparison, the share of the All Minority (Non-White) group rose further from 19.8% in 2000 to 31.9% in 2019. The fastest-growing racial or ethnic group between 2000 and 2019 are the people of Hispanic ethnicity, which increased by 7.5% per year during those 19 years. Also, the Asian or Pacific Islander population, as well as the Black population, have experienced a faster annual growth since 2010 compared to the previous decade. However, after robust growth of 11.5% annually between 2000 and 2010, the Native American population experienced an annual decrease of 9.0% between 2010 and 2019 (Table 3-4/Map 3-4).

Figure 3-3



Source: ACS, ESRI and RKG Associates, Inc., 2021

¹ Wikipedia, <https://en.wikipedia.org/wiki/Hispanic>

Table 3-4
Racial and Ethnic Composition of Population and Trend, 2000-2019
City of Troy, New York

Persons	2000		2010		2019		Chg. '00-'10		Chg. '10-'19	
	Count	Percent	Count	Percent	Count	Percent	Actual Chg.	Ann. % Chg.	Actual Chg.	Ann. % Chg.
Total	49,170	100.00%	50,011	100.00%	49,458	100.00%	841	0.17%	(553)	-0.12%
White	39,461	80.25%	37,566	75.12%	33,657	68.05%	(1,895)	-0.48%	(3,909)	-1.16%
Black	5,489	11.16%	6,524	13.05%	8,669	17.53%	1,035	1.89%	2,145	3.65%
Native Americans	117	0.24%	251	0.50%	47	0.10%	134	11.45%	(204)	-9.03%
Asian or Pacific Islanders	1,704	3.47%	1,862	3.72%	2,377	4.81%	158	0.93%	515	3.07%
All Other Race	2,399	4.88%	3,808	7.61%	4,708	9.52%	1,409	5.87%	900	2.63%
All Minority (Non-White)	9,709	19.75%	12,445	24.88%	15,801	31.95%	2,736	2.82%	3,356	3.00%
Hispanic Ethnicity	1,957	3.98%	3,986	7.97%	4,742	9.59%	2,029	10.37%	756	2.11%

Source: Decennial Census, American Community Survey 2019 5-Year Estimates and RKG Associates, Inc., 2021

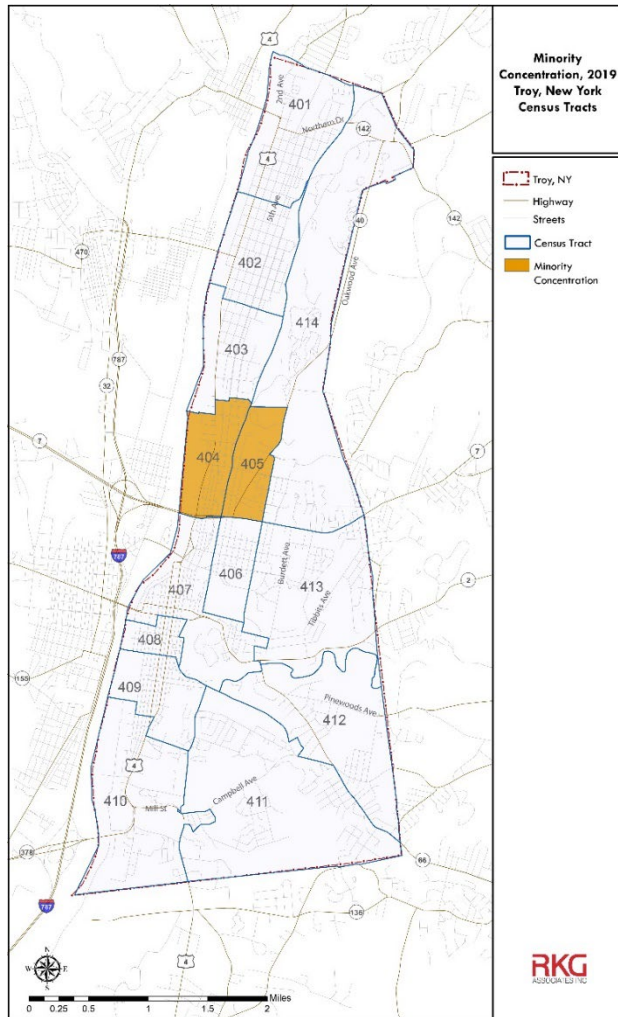
2. Racial/Ethnic Concentration

Federal regulations at Title 24 Housing and Urban Development Part 91.210 “Housing Market Analysis” require grantees of HUD Community Planning and Development programs to identify and describe any areas within their jurisdictions that have concentrations of racial/ethnic minorities and/or low-income families. HUD currently leaves the determination of thresholds defining “concentrations” up to each local grantee.

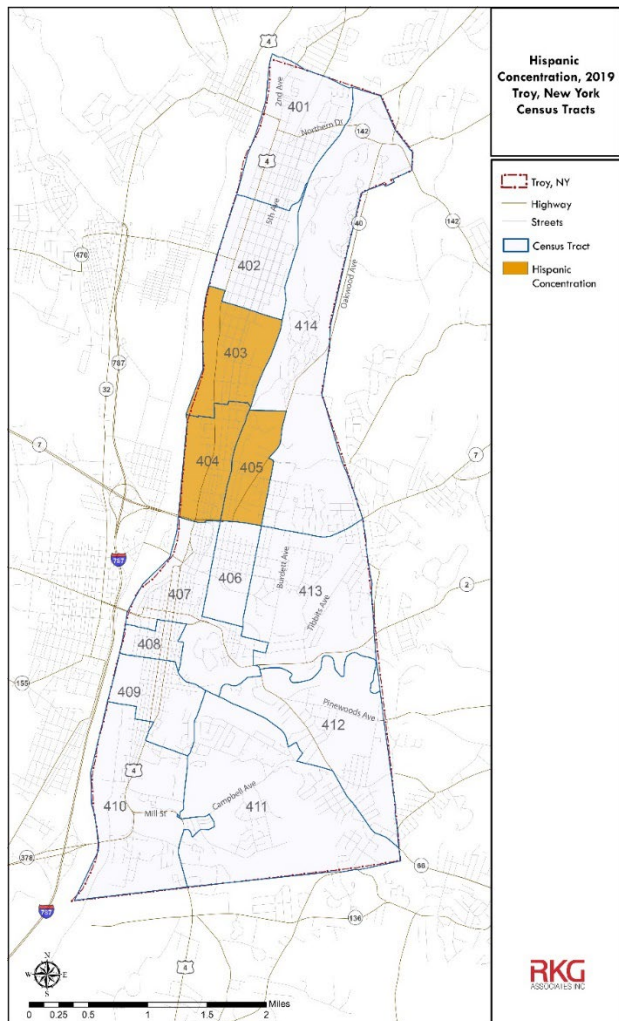
The approach currently applied by HUD’s Office of Policy Development and Research calls for an evaluation of population distribution in two primary categories: White, which includes any Census respondent who identifies as White and non-Hispanic, and minority, which includes any respondent identifying as a member of a non-White racial group or Hispanic ethnicity. Hispanic White people would be in the latter category.

RKG defined concentrations of minority populations as census tracts with non-White populations greater than 150% of the city-wide percentage of the combined minority population. For example, if the Hispanic population equaled 9.6% of the City’s population in 2019, then census tracts with Hispanic population shares of 14.4% or greater would be classified as a concentration. Troy has a concentration of the All-Minority population in Census Tracts 404 and 405, and a concentration of the Hispanic population in Census Tracts 403, 404, and 405, which are north of the downtown area. These neighborhoods also had lower median household incomes in 2019 than census tracts on the east side of the City. Census Tracts 403 and 405 even saw a loss in their population between 2010 and 2019 (Map 3-4, Map 3-5).

Map 3-4



Map 3-5



D. RACIAL/ETHNIC DISSIMILARITIES

Another factor related to the geographic distribution of racial and ethnic groups within a jurisdiction is the Racial Dissimilarity Index included in the HUD AFFH-T database. According to HUD's definition, "the dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups". In other words, the Index measures how much one racial/ethnic group is spatially separated from another within a jurisdiction. The data for each racial/ethnic group is presented in comparison to the White segment of Troy's population (Table 3-5).

Table 3-5
Dissimilarity Index by Race/Ethnicity, 2000-2010
City of Troy, New York

	2000	2010
Non-White/White	25.61	20.71
Black/White	28.87	25.51
Asian/Pacific Islander/White	51.24	43.78
Hispanic/White	21.32	21.63

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

The Dissimilarity Index has values between 0 and 100, with a score of 0 representing perfect integration and a value of 100 corresponding with total segregation. A Dissimilarity Index below 40 represents low segregation, a value between 40 and 55 suggests moderate segregation, and a score above 55 indicates high segregation. The latest data available for the racial dissimilarity index is for the year 2010. All the Dissimilarity Index values for the City of Troy in 2010 are below 40 except for the Asian/Pacific Islander/White index of 43.78, indicating moderate segregation between the Asian/Pacific Islander population and the White population and low segregation between other racial and ethnic minority groups and the White population (Table 3-5).

E. PLACE OF NATIONAL ORIGIN

According to the definition of the U.S. Census Bureau, the foreign-born population includes anyone who is not a U.S. citizen at birth, including those who become U.S. citizens through naturalization. Limited English Proficiency is used to refer to a person who is not fluent in the English language, often because English is not their native language. Understanding the foreign-born population and people with limited English proficiency is important for identifying the impediments to fair housing choice as well as associated solutions in the City of Troy, as these population groups often have more limited fair housing options, usually due to cultural and language barriers. The year 2015 is the most current data series from HUD for the place of national origin data. According to the HUD AFFH data, the foreign-born population in the

City of Troy was 3,902 in 2015, accounting for 7.8% of the total population (Table 3-6). The largest foreign-born group is the Chinese (excluding Taiwan) population, accounting for 1.4% of the total foreign-born population in the City. The second-largest immigration group is the Other Caribbean population, followed by people from India, Mexico, and Other Western Asia. In addition, 4.2% of the total population in the City had limited English proficiency in 2015. Apart from English, the most populous language was Spanish, as 5.4% of the total population in the City were Spanish speakers, followed by Chinese, other Indo-European languages, other and unspecified languages, and other Asian and Pacific languages (Table 3-7).

Between 2010 and 2015, both the foreign-born population and the population with limited English proficiency have seen a decrease after a rise during the previous decade, with an annual drop of 2.1% and 0.8%, respectively, or 10.4% and 4.1% over the five years. The shares out of the total population of these two groups also declined during the five years according to the HUD AFFH data (Table 3-8).

Table 3-6

Population by Top 5 Most Populous National Origin Groups City of Troy, New York, 2015

	Count	% of Total Population
Total Foreign-Born Population	3,902	7.78%
China excl. Taiwan	640	1.36%
Other Caribbean	350	0.74%
India	215	0.46%
Mexico	215	0.46%
Other Western Asia	195	0.42%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Table 3-7

Limited English Proficiency Persons by Top 5 Most Populous Languages City of Troy, New York, 2015

	Count	% of Total Population
Spanish	2,555	5.44%
Chinese	815	1.73%
Other Indo-European Language	750	1.60%
Other & Unspecified Language	545	1.16%
Other Asian & Pacific Language	370	0.79%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Table 3-8

**Foreign-Born Population and Limited English Proficiency Persons
City of Troy, New York, 2000-2015**

				Chg. '00-'10		Chg. '10-'15	
				Actual Chg.	% Chg.	Actual Chg.	% Chg.
	2000	2010	2015				
Foreign-Born Population							
Number	2,872	4,353	3,902	1,481	51.57%	(451)	-10.36%
Percent of Total Population	5.84%	8.68%	7.78%	N/A	N/A	N/A	N/A
Limited English Proficiency Persons							
Number	2,176	2,211	2,120	35	1.61%	(91)	-4.12%
Percent of Total Population	4.43%	4.41%	4.23%	N/A	N/A	N/A	N/A

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

F. DISABILITY BY TYPE AND AGE GROUP

The Americans with Disabilities Act (ADA) defines a person with a disability as “a person who has a physical or mental impairment that substantially limits one or more major life activity.” People with disabilities may face more barriers to fair housing options as they often need special physical accommodations in their housing and are more likely to experience housing discrimination.

Cognitive difficulty is the most common type of disability for Troy residents, with 7.8% of people with this condition, followed by people with ambulatory difficulty, which affects 7.5% of the total population. It should be noted that a person can have more than one type of disability, and therefore can be counted more than once under multiple disability categories.

Census Tract 407, which includes the downtown area, has seen over 10% of its population with more than one type of disability (Table 3-9). This is followed by Census Tracts 403, 404, 409, and 410, which have over 10% of their population with a certain type of disability. These census tracts mostly cluster on the west side of the City, generally overlapping with neighborhoods with lower median household incomes and higher concentrations of the non-white and Hispanic population. This indicates that there is a geographic disparity among census tracts in terms of concentrations of persons with disabilities in Troy. Most people with disabilities in the City of Troy are between 18 and 64 years old, according to the HUD AFFH data, accounting for 9.8% of the total population.

Table 3-9
Percent of Persons with Disabilities of Total Population by Type, ACS 2011-2015
City of Troy Census Tracts, New York

	With Hearing Difficulty	With Vision Difficulty	With Cognitive Difficulty	With Ambulatory Difficulty	With Self- Care Difficulty	With Independent Living Difficulty
401	3.73%	1.74%	8.58%	9.42%	4.93%	9.14%
402	5.07%	2.51%	9.15%	8.39%	3.25%	5.15%
403	2.22%	1.35%	4.88%	10.04%	3.57%	3.45%
404	3.80%	5.52%	12.66%	9.67%	2.68%	6.23%
405	1.70%	2.52%	8.03%	8.90%	3.09%	4.48%
406	0.77%	0.45%	7.31%	2.35%	0.77%	2.89%
407	2.72%	2.31%	16.25%	13.89%	4.07%	9.05%
408	1.89%	0.80%	6.01%	4.52%	1.03%	2.57%
409	2.09%	2.57%	10.56%	8.25%	5.30%	6.08%
410	3.11%	4.61%	10.46%	7.26%	1.12%	4.81%
411	3.90%	1.13%	3.76%	4.11%	1.38%	4.25%
412	3.00%	0.84%	3.77%	6.22%	0.31%	3.56%
413	2.26%	0.79%	4.03%	2.71%	0.65%	3.46%
414	4.65%	0.87%	5.00%	9.54%	2.91%	5.74%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

G. POVERTY INDEX

The poverty level of the population within a jurisdiction is often associated with how easily the community can access opportunities and resources including housing. If a community is exposed to high levels of poverty, then the residents may encounter more barriers to fair and affordable housing options. For example, a person living below the poverty level would not likely qualify for a mortgage loan due to lower income levels. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure how much a community is exposed to poverty. The Low Poverty Index has scores ranging from 0 to 100, and a higher value represents less exposure to poverty in a neighborhood.

Within the City of Troy, though the Low Poverty Index scores of the different racial/ethnic groups fall not too far apart in the low-to-medium range, the Asian/Pacific Islander population with the highest score of 38.7 has the least exposure to poverty, followed by the White population (31.9). In contrast, the Black population with a score of 21.3 has the greatest exposure to poverty compared to other racial/ethnic groups, followed by the Hispanic population (23.4). In general, all the racial/ethnic groups in the City have scores between 20 and 40, indicating higher exposure to poverty across different racial/ethnic groups in the City compared to other communities (Figure 3-4).

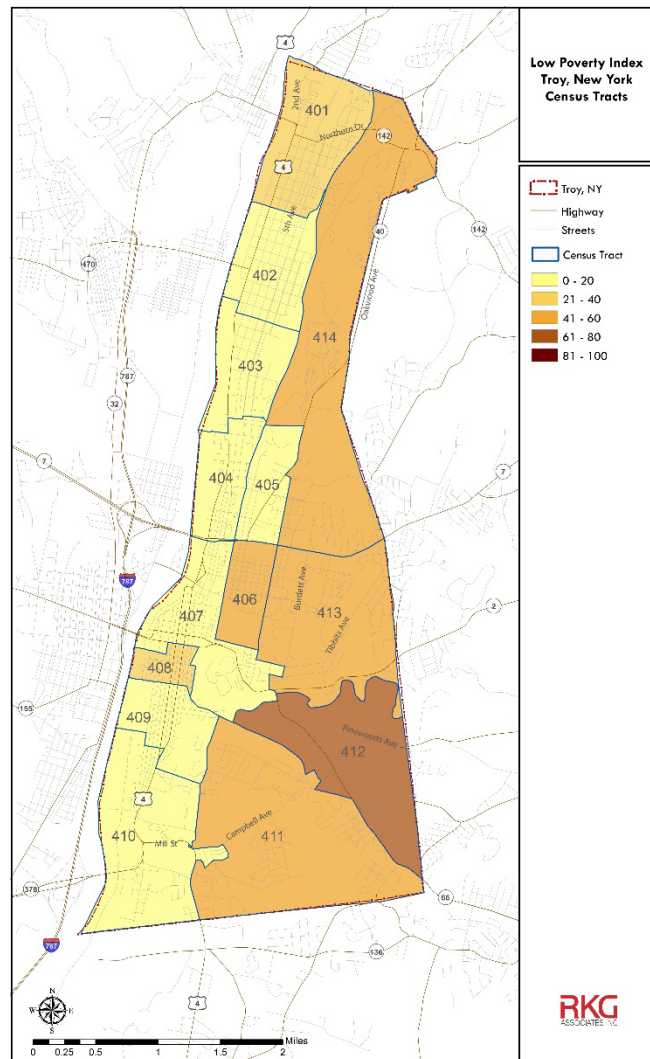
There is also a geographic disparity in poverty levels across the City. The census tracts with the lowest Poverty Index scores generally match the areas with concentrations of the non-White and the Hispanic population compared to other census tracts within Troy. This result corresponds with the conclusion that the non-White population in the City has the most exposure to poverty. This map also closely aligns with the 2019 median household income map in that census tracts with low scores and thus high poverty levels generally have lower median household incomes and are located on the west side of the City except for Census Tracts 401 and 408.

It should be noted that some of these non-white and Hispanic populations with lower household incomes in these areas are likely college students, as Census Tract 407 overlaps with part of the Rensselaer Polytechnic Institute. Besides, this map shows once again that census tracts with the lowest poverty levels are generally located on the east side of the City where there have been higher median household incomes and faster population gains occurred between 2010 and 2019 (Map 3-6).

H. SCHOOL PROFICIENCY INDEX

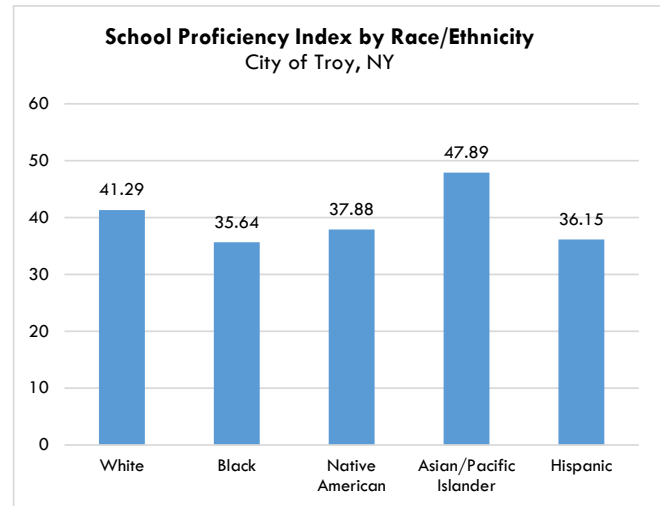
School proficiency is an indicator of the quality of the education available to a given community. Higher education quality is usually associated with better access to opportunities and higher income in addition to a higher quality of life. HUD's School Proficiency Index is based on the test scores of elementary schools within an area and measures which neighborhoods have high-performing elementary schools nearby. The values of the index range from 0 to 100 and higher scores indicate higher school system quality in a community.

Map 3-6



The school proficiency index scores of the different racial/ethnic groups in Troy are relatively moderate with all scores below 50, with a disparity of access to quality education existing among the racial/ethnic groups (Figure 3-5). The Black population which has the lowest Low Poverty Index also has the lowest School Proficiency Index score of 35.6, followed by the Hispanic population with a score of 36.2 and the Native American population with a score of 37.9, indicating that these three groups have comparatively much less access to education quality. In comparison, the Asian/Pacific Islander population which also has the highest Low Poverty Index score has the highest School Proficiency Index score of 47.9.

Figure 3-5

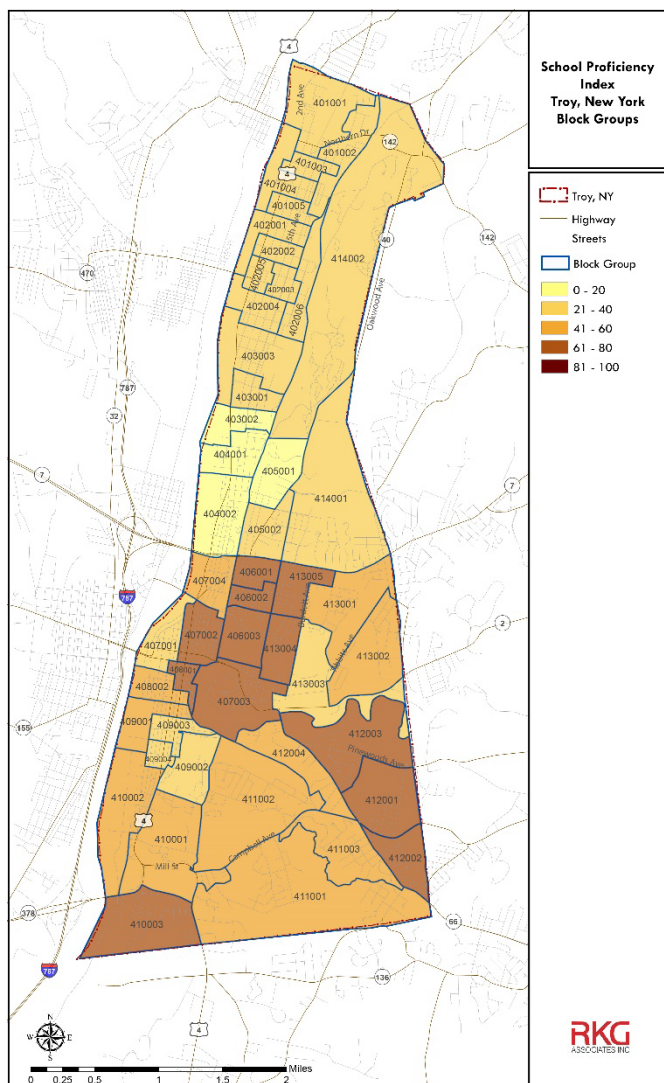


Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

The disparity in access to education quality among the racial/ethnic groups is also reflected in the different educational attainment levels in the City. According to the American Community Survey 2015-2019 5-Year Estimates, the Asian population has the highest education attainment level in Troy as 72.6% of them had bachelor's degrees or higher in 2019, followed by the White population at 29.7%. In comparison, only 10.6% of the Black population had bachelor's degrees or higher, followed by the Hispanic population at 11.2% in 2019.

The School Proficiency Index values were then mapped by block group in the City, with darker colors indicating higher values and thus better elementary school performances. The lowest-performing census tracts in terms of school proficiency (below a value of 25) are generally on the west side of the City and north of New York State Highway 7, overlapping with areas with a concentration of the non-White population and the Hispanic population (Map 3-7).

Map 3-7



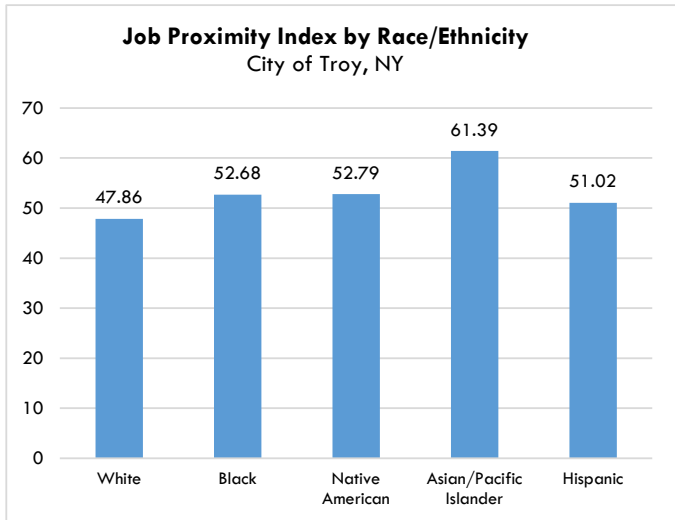
I. JOB PROXIMITY INDEX

HUD measures a community's access to employment opportunities with the Job Proximity Index and Labor Market Engagement Index. Job Proximity Index quantifies the distance between a given block group and employment centers within a Core Based Statistical Area (CBSA). The index values range from 0 to 100, with higher scores indicating better access to job opportunities for residents in a neighborhood.

The City's Asian/Pacific Islander population resides within the closest proximity to jobs, with the highest score of 61.4, followed by the Native American population, with a score of 52.8 (Figure 3-6). The White population, in contrast, resides the furthest away from employment centers, with the lowest score of 47.9.

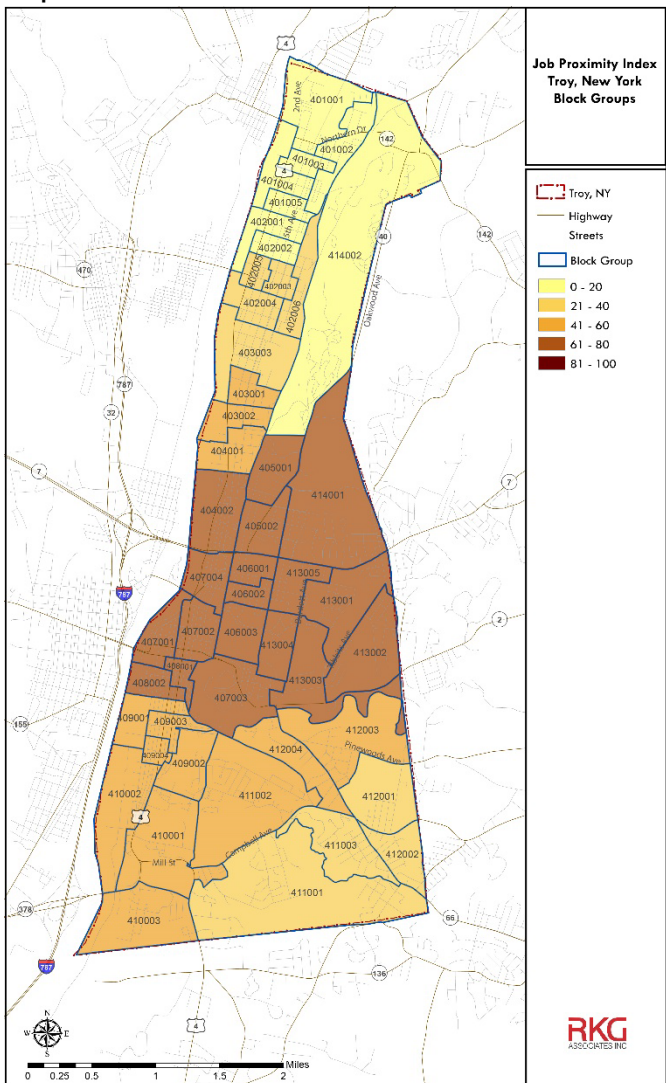
Darker colors on the Job Proximity Index Map indicate higher index values and therefore closer proximity to job opportunities. Neighborhoods in the middle portion of the City along New York State Highway 7 and Highway 4 are closer to jobs compared to the rest of the City due to the cluster of major employment centers in and around the downtown area, such as Rensselaer Polytechnic Institute, Russel Sage College, City, and County government agencies and local businesses. This suggests that the Asian/Pacific Islander population with the highest score likely resides near these neighborhoods in and around the downtown, while the White population likely live in communities that are further away from the downtown area on the north or south sides of the City, resonating with the highest Asian/Pacific Islander/White Racial Dissimilarity index of 43.78 and moderate segregation between these two groups as discussed earlier (Map 3-8).

Figure 3-6



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Map 3-8



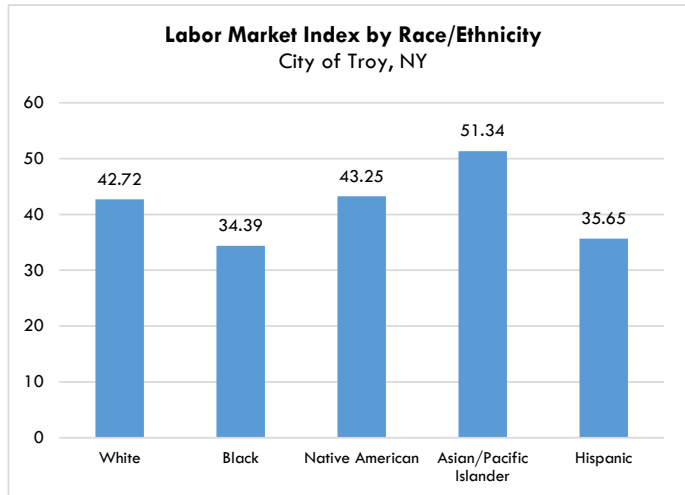
J. LABOR MARKET ENGAGEMENT INDEX

In addition to the proximity to job centers, HUD also measures a neighborhood's job access with the Labor Market Engagement Index, which, according to HUD's description, "provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood." The Index is based on the unemployment rate, labor force participation rate, and educational attainment data. This is because distance alone does not solely determine a community's access to employment opportunities, such as the types of jobs available, and whether the education and skills these jobs require match the education attainment levels of the residents in a neighborhood. The index values range from 0 to 100, with higher scores representing higher labor force participation and human capital in the community.

Similar to the Low Poverty Index, there is a disparity among racial/ethnic groups in labor market engagement and human capital in Troy, though the index scores among different racial/ethnic groups are generally in the medium to lower range. The City's Asian/Pacific Islander population has the highest Labor Market Engagement Index score at 51.3 (Figure 3-7). This finding suggests that this racial group has the closest match between the local jobs and the people that access those jobs. This also resonates with the fact that the Asian/Pacific Islander population has the highest School Proficiency Index score and Job Proximity Index score.

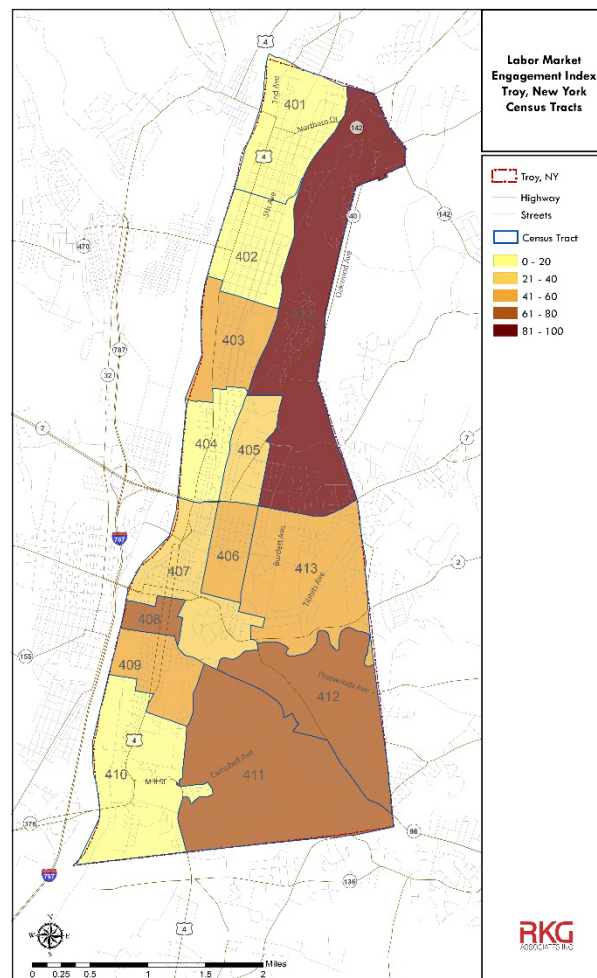
The Black population which has the lowest score of 34.4 and the Hispanic population which has the second-lowest score of 35.6 have lower levels of engagement in the labor market and human capital compared to other groups. This mirrors these groups' lower

Figure 3-7



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Map 3-9



levels of higher education attainment and household incomes as discussed earlier. This also suggests that the Black and the Hispanic groups not only lack close access to employment opportunities, but their engagement in the job market and the level of their human capital are also comparatively lower than other racial/ethnic groups in the City.

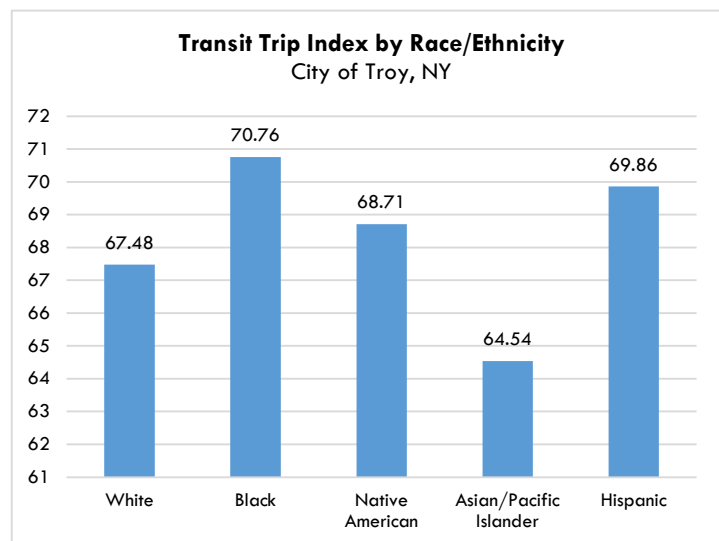
Labor Market Engagement Index values by census tract vary throughout the City, with darker colors indicating higher levels of labor market engagement and human capital, and therefore, better access to employment opportunities in a neighborhood. The data indicate that the greatest access to employment is achieved on the east side of the City, generally matching the neighborhoods that experienced faster population gains between 2010 and 2019, higher median household incomes, and less exposure to poverty. In comparison, the lowest access is seen on the west side of the City and north of New York State Highway 2, where higher poverty levels and more non-White and Hispanic populations tend to concentrate in Troy. In particular, Census Tract 404 which overlaps with the neighborhoods that have a high concentration of the non-White and the Hispanic population also has the lowest labor market engagement level (Map 3-9).

K. TRANSIT TRIP INDEX

A community's access to opportunities is also influenced by the levels of mobility and availability of low-cost transportation options. This can be measured by HUD's Transit Index and Low Transportation Cost Index. Both indices are based on the data of 3-person, single-parent families with income at 50 percent of the median income for renters in the region, with values ranging from 0 to 100. The higher the Transit Trip Index value, the more likely residents in a neighborhood to utilize public transit. The Transit Trip Index controls for income such that a higher index score will often reflect better public transit access.

The Transit Trip Index scores of Troy's racial/ethnic groups fall closely into the higher range, indicating that transit use is comparatively prevalent in the City. The Black population is most likely to use public transit, with the highest score of 70.8, closely followed by the Hispanic and the Native American population, with scores of 69.9 and 68.7, respectively (Figure 3-8). The Asian/Pacific Islander population has the lowest score of 64.5 and is least likely to use public transit compared to other racial/ethnic groups in Troy. This is not surprising as the Black population which has higher levels of poverty most likely has less access to private vehicles, and therefore relies more on the public transit system.

Figure 3-8



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

The Route 288 RPI Uptown Shuttle and the Route 815 Troy Shopping Bus are currently not in service. Route 288 RPI Uptown Shuttle, Route 289 Griswold Heights, and Route 802 Troy Shuttle operate within the City the Troy. Route 802 Troy Shuttle operates on weekdays starting from 7:55 am till 3:47 pm. Route 289 Griswold Heights operates from 6:30 am to 11:45 pm on weekdays, and from 9:00 am till 5:50 pm on weekends. All the other routes are regional services connecting Troy to nearby cities or points of interest. The regional routes operate starting as early as 5:18 am and ending by 1:00 am at the latest depending on the bus route and the day of the week.

The base fare is \$1.50, and BusPlus Fare is \$2.00. Citizens aged 65 and over, disabled individuals, Medicare cardholders, and veterans are entitled to ride for half fare at \$0.75 for Base Half Fare and \$1.00 for BusPlus Half Fare on CDTA's fixed-route service. A valid Half Fare Navigator card is required when paying half fare on the bus. Children 46" and under can ride free when accompanied by a fare-paying adult. All buses have bike racks and are wheelchair accessible. Fare rates are also discounted for Navigator Smart Card and Mobile App users.

Transit Trip Index
Troy, New York
Census Tracts

Legend:

- Troy, NY
- Highway
- Streets
- Census Tract
- 0 - 20
- 21 - 40
- 41 - 60
- 61 - 80
- 81 - 100

Map Labels:

Census Tracts: 401, 402, 403, 404, 405, 406, 407, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.

Scale: 0 0.25 0.5 1 1.5 2 Miles

North Arrow: N, S, E, W

Map Labels: 2nd Ave, Northern Dr, 5th Ave, Calverton Ave, Burdett Ave, Thayer Ave, Pinewood Ave, Campbell Ave, Main St, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295

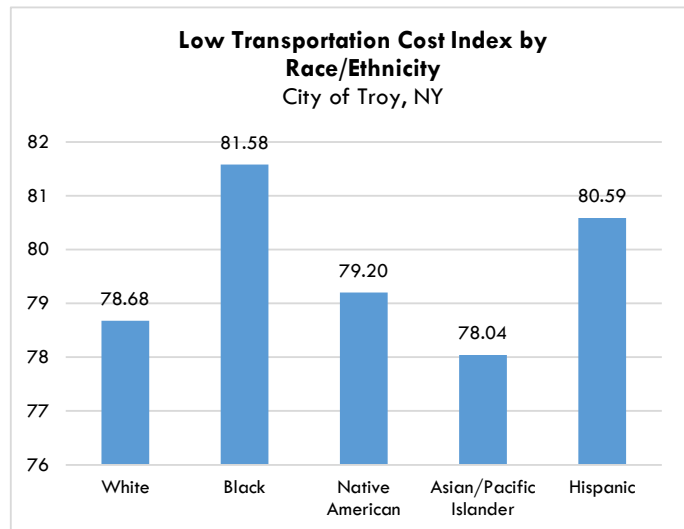
L. LOW TRANSPORTATION COST INDEX

Another HUD indicator that evaluates the transportation opportunity access of a community is the Low Transportation Cost Index. It measures the cost of transport by neighborhood. The index values also range from 0 to 100, and the higher the index score, the lower the cost of transportation in that community. Transportation costs may be low for several reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

The transportation costs for all racial/ethnic groups in the City are relatively low, as the Low Transportation Cost Index scores for different racial/ethnic groups cluster in the higher range. The Black population in Troy has the lowest transportation cost compared to other racial/ethnic groups, with the highest score of 81.6, followed by the Hispanic population with a score of 80.6. The Asian/Pacific Islander population has the highest transportation cost among all racial/ethnic groups, with the lowest score of 78.0 (Figure 3-9).

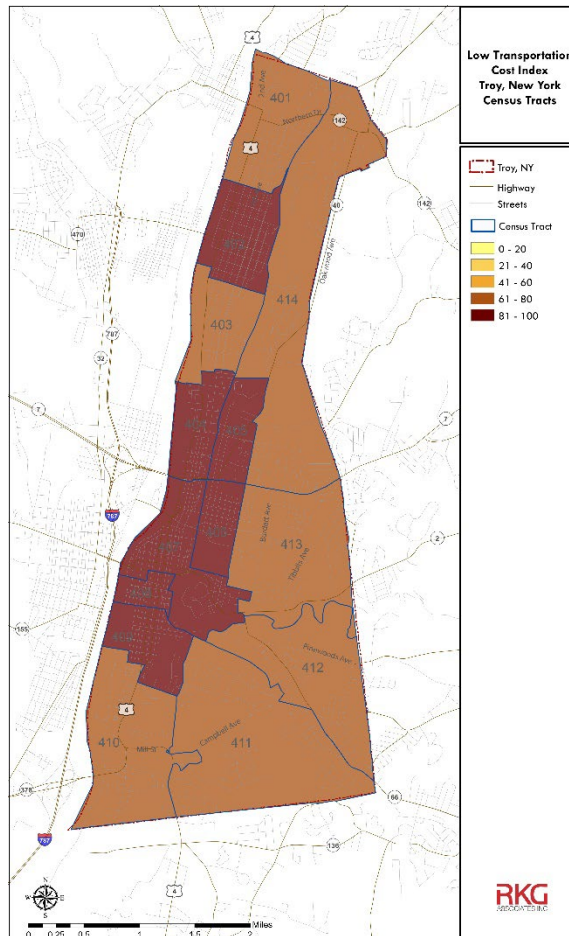
The Low Transportation Index scores exhibit a geographic difference across the City. Neighborhoods around the City's downtown and on the west side of the City have the highest scores and the lowest transportation costs, while the remaining have the highest transportation costs as these areas are more suburban, have higher income levels, and have more residents in these areas can afford cars (Map 3-11).

Figure 3-9



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Map 3-11



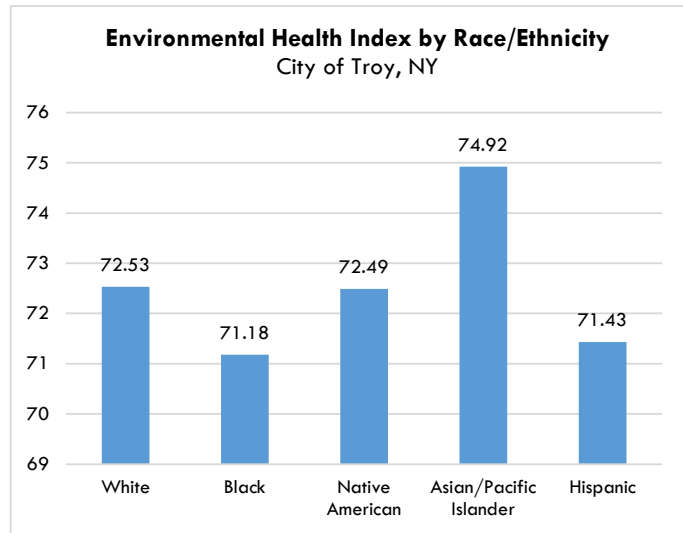
M. ENVIRONMENTAL HEALTH INDEX

HUD also measures the environmental quality of neighborhoods with the Environmental Health Index. The index measures the exposure to toxins harmful to human health at a neighborhood level. It is based on the U.S. Environmental Protection Agency (EPA) estimates of the air quality by neighborhood, and only measures issues related to air quality and no other factors impacting human health. The Environmental Health Index has values ranging from 0 to 100, with higher scores representing less exposure to harmful toxins, and therefore, better environmental quality of a neighborhood.

The Environmental Health Index scores of different racial/ethnic groups in Troy are close ranging between 71 and 75, indicating upper-medium environmental health for all groups (Figure 3-10). The Asian/Pacific Islander population in Troy resides in neighborhoods with comparatively the best environmental air quality compared to other racial/ethnic groups in the City, with the highest score of 74.9. The Black population has the lowest Environmental Health Index score of 71.2, followed by the Hispanic population with a slightly higher score of 71.4. This indicates that these two groups are more likely to reside in neighborhoods with lower air quality.

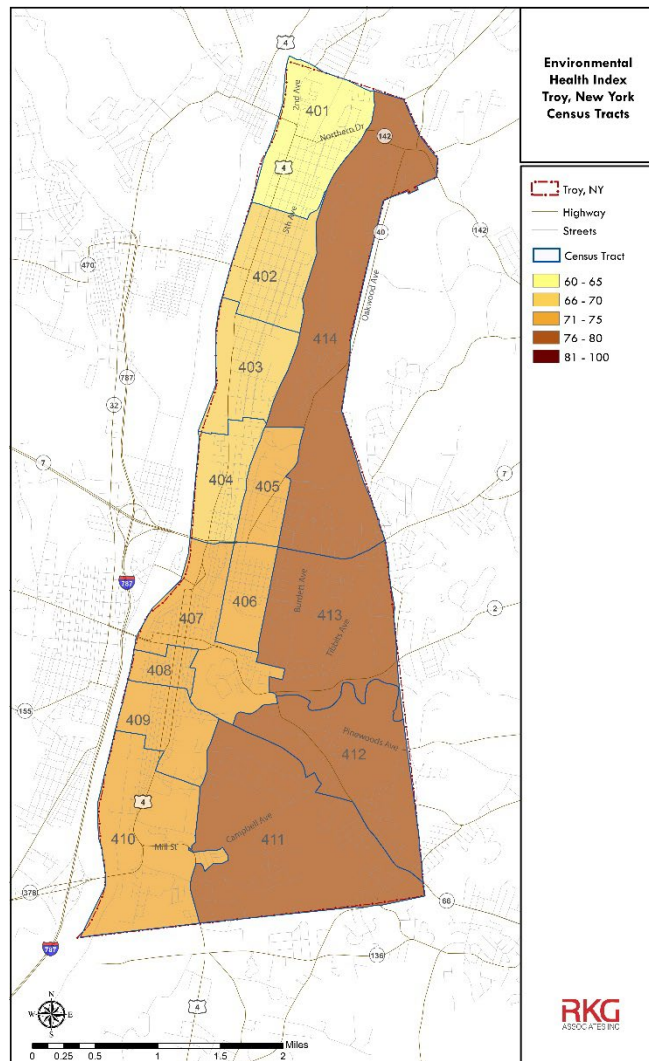
The environmental health across the City varies by geography though falling in a close range, ranging from 63 (Census Tract 401) to 78 (Census Tract 412) (Map 3-12). The pattern of the geographic difference of the Environmental Health Index in Troy is like some of the previous indices discussed, as areas on the west side of the City and north of New York State Highway 2 with a concentration of lower-income neighborhoods have

Figure 3-10



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

Map 3-12

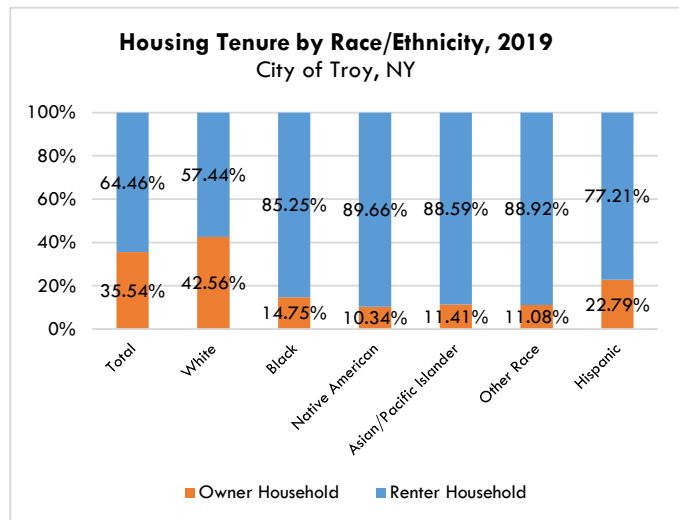


lower environmental quality. In contrast, people living on the east side of the City generally have more access to most opportunities and higher environmental quality. The biggest environmental factor in most communities is automobile emissions, which are highest in urban areas where there are high traffic volumes and congestion.

N. HOUSING TENURE

The HUD AFFH system utilizes CHAS 2009-2013 data to analyze the housing conditions and problems in neighborhoods. The consultants also complement the analysis with housing tenure data from the 2019 American Community Survey (ACS) 5-Year Estimates. One indicator to examine the existing housing stability in the City of Troy is the homeownership rate by racial/ethnic groups. As purchasing a home is the biggest investment most people will make in their lifetime when property values appreciate, homeowners can accumulate asset value and household wealth at the same time. Therefore, a higher homeownership rate is usually associated with more household wealth and stability. Historically, minority racial groups tend to have lower homeownership rates than white households in the U.S (Figure 3-11).

Figure 3-11



Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

This also generally holds true in the City of Troy, where the White population in the City has the highest homeownership rate of 42.6% among all racial/ethnic groups, which is higher than the citywide average of 35.5%. In comparison, all other minority groups have homeownership rates lower than the City average. In particular, the Native American population has the lowest homeownership rate of 10.3% compared to other groups. The Hispanic population has the second highest homeownership rate at 22.8%.

There is also a geographic disparity in homeownership rates across different neighborhoods in Troy. In general, higher-income neighborhoods on the east side of the City have higher proportions of owner households, which are all between 40% and 60%. However, neighborhoods on the west side of the City especially the downtown area (Census Tract 407) have 10.1% of owner households, which is the lowest compared to other parts of the City. This is likely linked to the concentration of around 10 publicly assisted housing projects in this census tract, which are mostly rental in nature. Likewise, most of the housing stock in these neighborhoods is occupied by renter households, some are likely college students as part of the Rensselaer Polytechnic Institute campus falls within Census Tract 407 (Map 3-13).

**Owner Household Percentage, 2019
Troy, New York
Census Tracts**

- Troy, NY
- Highway
- Streets
- Census Tract
- 0% - 20%
- 20.1% - 40%
- 40.1% - 60%
- 60.1% - 80%
- 80.1% - 100%

The map displays the following census tracts and their approximate owner household percentages:

Census Tract	Approximate Owner Household Percentage (%)
401	40.1% - 60%
402	40.1% - 60%
403	40.1% - 60%
404	40.1% - 60%
405	40.1% - 60%
406	20.1% - 40%
407	0% - 20%
408	40.1% - 60%
409	40.1% - 60%
410	40.1% - 60%
411	40.1% - 60%
412	40.1% - 60%
413	40.1% - 60%
414	40.1% - 60%

The amount of affordable rental housing units within a city is an important indicator of the availability of fair housing choice options. According to the HUD AFFH data, among the 12,385 rental units in Troy, 65.8%, or 8,150 units are classified as affordable units (Table 3-10).

	Count	Percent
Total Renter Units	12,385	100.00%
Total Affordable Renter Units	8,150	65.81%

Neighborhoods on the northwest side of the City (Census Tracts 401 and 402) have over 80% of rental units that are affordable, which is

the highest concentration compared to the rest of the City (Map 3-14). In comparison, neighborhoods on the east side of the City north of New York State Highway 2 have below 50% of their rental units classified as affordable. Census Tract 414 even has only 36.2% of its rental units classified as affordable, which is the lowest in the City.

P. PUBLICLY SUPPORTED HOUSING AND RACE/ETHNICITY

Troy currently has 556 Section 8 households using rental housing vouchers administered by the Troy Housing Authority. There are 10 Rental Assistance Demonstration (RAD) Projects (formerly Public Housing) owned by the Troy Housing Authority totaling 1,001 units. In addition, Troy has 13 Low Income Housing Tax Credit (LIHTC) projects with 686 units, and two of the projects (Martin Luther King Apartments and the John F Kennedy Towers) totaling 218 units are owned and managed by the Troy Housing Authority. There are also seven other HUD-Assisted Multifamily Projects totaling 340 units in Troy. The total number of publicly assisted housing units in the City is 2,243 as of September 2021 (Table 3-11).

The consultants also obtained data relative to the total number of Troy Housing Authority project occupants and Section 8 voucher participants by race/ethnicity from the Housing Authority. Currently, over half (53%) of the participants in the 10 Rental Assistance Demonstration (RAD) Projects (formerly Public Housing) plus the Martin Luther King Apartments are African American, followed by White (46%). American Indian/Alaska Native and Asian/Hawaiian/Pacific Islander participants are not as common, with each group contributing under 10 participants. The Hispanic participants account for 27%, and there are 9% elderly and 19% disabled participants (Table 3-12).

Map 3-14

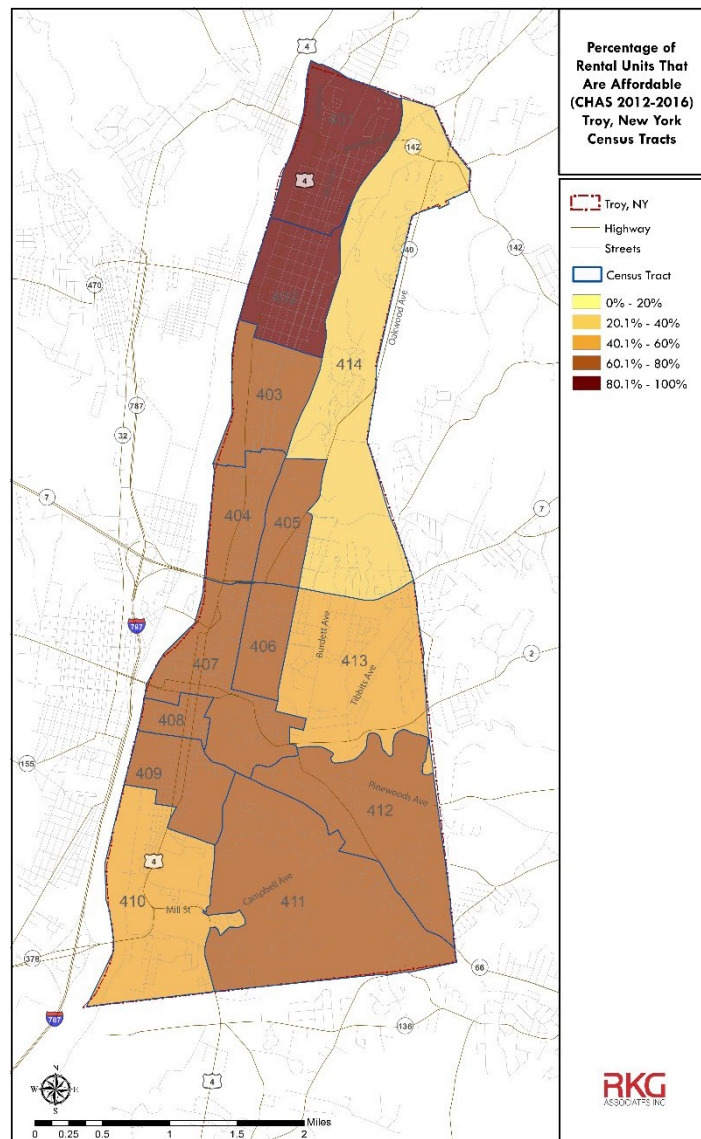


Table 3-11
Publicly Assisted Housing Projects
City of Troy, New York

	Population Served	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom	TOTAL	TOTAL Low Income Units
Section 8 Voucher	General							556	556
Rental Assistance Demonstration (RAD) Project Based Voucher Units (formerly Public Housing)									
Corliss Park Apartments	General		4	106	36	38		184	184
Taylor Apartment, Bldg 3 & 4	General		8	108	9			125	125
Arnold E. Fallon Apartments	General		2	30	8			40	40
Catherine M. Sweeney Apartments	General		2	18	4			24	24
Margaret W. Phelan Apartments	General		36	16	26	10		88	88
Grand Street Apartments	General	3	23	14	2			42	42
Griswold Heights Apartments	General			286	69	30	5	390	390
Edward A. Kane Apartments	Elderly (62+)		60					60	60
Conway Court Apartments	Elderly (62+)		40					40	40
Guenette Apartments, 6-8 115th Street	Veterans	8						8	8
Low Income Housing Tax Credit Projects									
Martin Luther King	General			22	49	12		83	83
John F Kennedy Towers	Elderly (55+)		135					135	135
	General (19 Units for Domestic Violence Survivors)			34					
Tapestry On The Hudson	General			33				67	61
Diamond Rock Terrace	General							81	81
Diamond Rock Terrace Phase II (Federal)	General			36				36	36
O'Neil Apartments	General	13	122	1				123	121
Monument Square Apartments	General		76					89	88
Van Rensselaer Apartments	General		49					49	49
2251-2255 Fifth Ave	General			1	1	1		3	3
2239 Fifth Ave	General	1		1	1			3	3
2243 Fifth Ave	General		3					3	3
2247 Fifth Ave	General				2	1		3	3
School 10	General	2		13	5			20	20
Other HUD Assisted Multifamily Projects									
Tenth Avenue (Section 202)	Elderly (62+)		6					6	6
Rensselaer County Community Residential (Section 202)	Elderly (62+)		8					8	8
OPEC Housing (Section 202 & Section 811)	Elderly (62+)/Disabled		12					12	12
Ninth Street NSA I	General		10	25	5			40	40
Ninth Street NSA II	General		19	21	32	8		80	80
Burns Apartments	General		99					99	99
Lansingburgh Apartments	General	23	72					95	95
TOTAL								2,252	2,243

Source: City of Troy Housing Authority, HUD LIHTC Database Access, HUD Resource Locator, and RKG Associates, Inc., 2021

Among the existing 1,167 Section 8 voucher participants, over half (55%) of them are White, followed by African American (44%), Hispanic (14%), and American Indian/Alaska Native (1%). There are currently no Asian or Hawaiian/Pacific Islander participants in Troy's Section 8 voucher program. Also, 27% of all the participants are disabled, and 13% are elderly participants (Table 3-13).

The locations of the publicly assisted housing projects were then mapped (Map 3-15), and the result echoes the previous maps in that the City's west side which has a high percentage of rental units and affordable rental units also sees a cluster of publicly assisted housing projects. Note that several of the dots signifying LIHTC projects in Census Tract 407 partially overlap with one another as these projects are located in close proximity.

The consultant also obtained the number of Section 8 Voucher housing units for each census tract from the Troy Housing Authority. Note that the Troy Housing Authority could not share the actual locations or addresses of the Section 8 Voucher housing units due to privacy concerns. Census Tract 404 has the most Section 8 units (98 units) in the City, followed by Census Tract 403 (74 units). These two census tracts also have a cluster of the non-White and the Hispanic population in Troy, as well as households with lower median household incomes. The consultant mapped the data by census tract and the result shows that the west side of the City has a higher concentration of Section 8 Voucher housing units. This resonates with the previous findings that the west side of the City has lower household incomes, a higher share of renters who are usually non-White minority and Hispanic people, and less access to economic and employment opportunities (Map 3-16).

Table 3-12
Public Housing Household Composition, 2021
City of Troy, New York

	TOTAL
Total	2,520
White	1,161
Black	1,346
American Indian/Alaska Native	7
Asian	5
Hawaiian/Pacific Islander	1
Hispanic	689
Elderly (62+)	218
Disabled	467
Percentage	
Total	100%
White	46%
Black	53%
American Indian/Alaska Native	0%
Asian	0%
Hawaiian/Pacific Islander	0%
Hispanic	27%
Elderly	9%
Disabled	19%

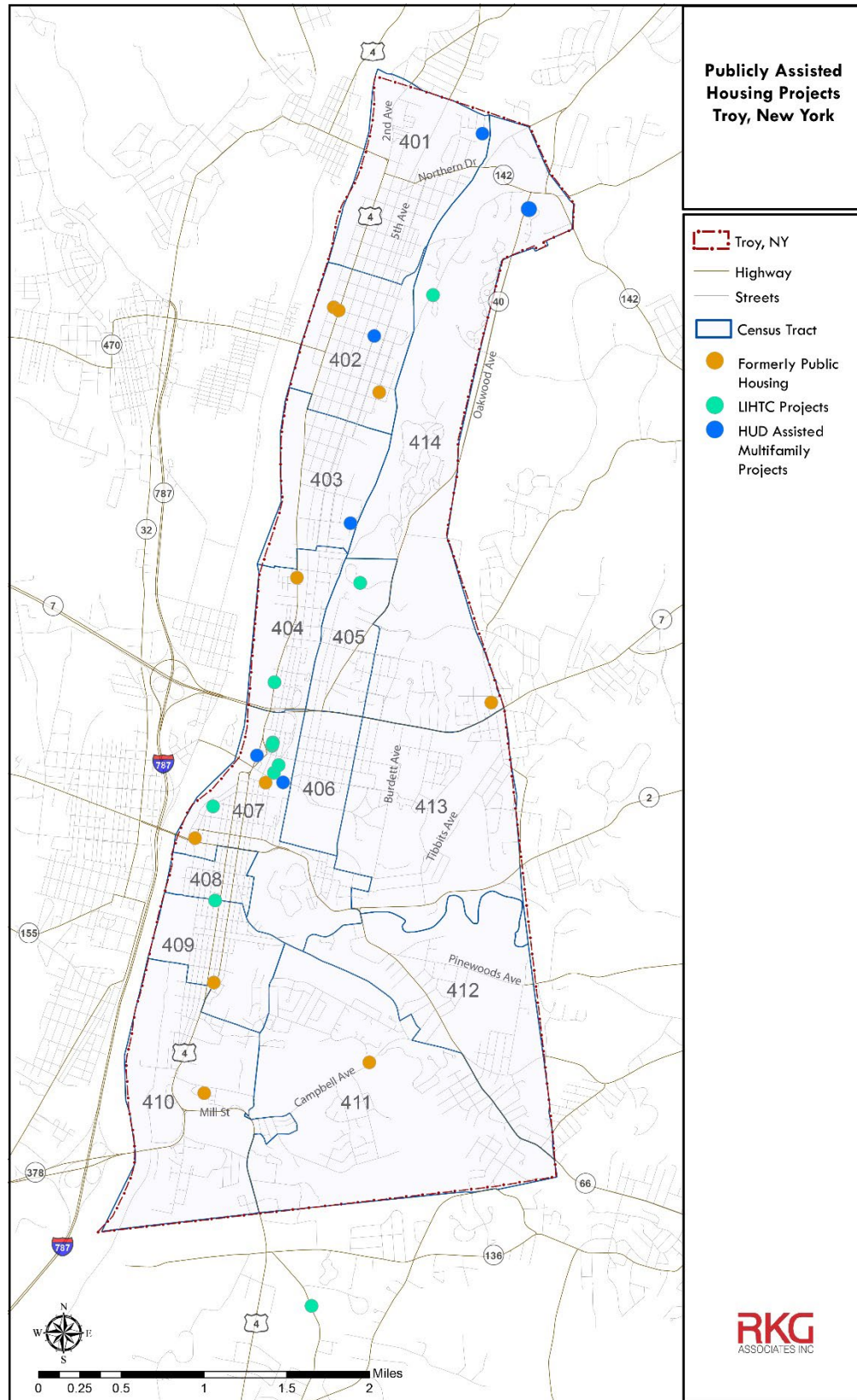
Source: Troy Housing Authority and RKG Associates, Inc., 2021

Table 3-13
Section 8 Voucher Program Participant Composition, 2021
City of Troy, New York

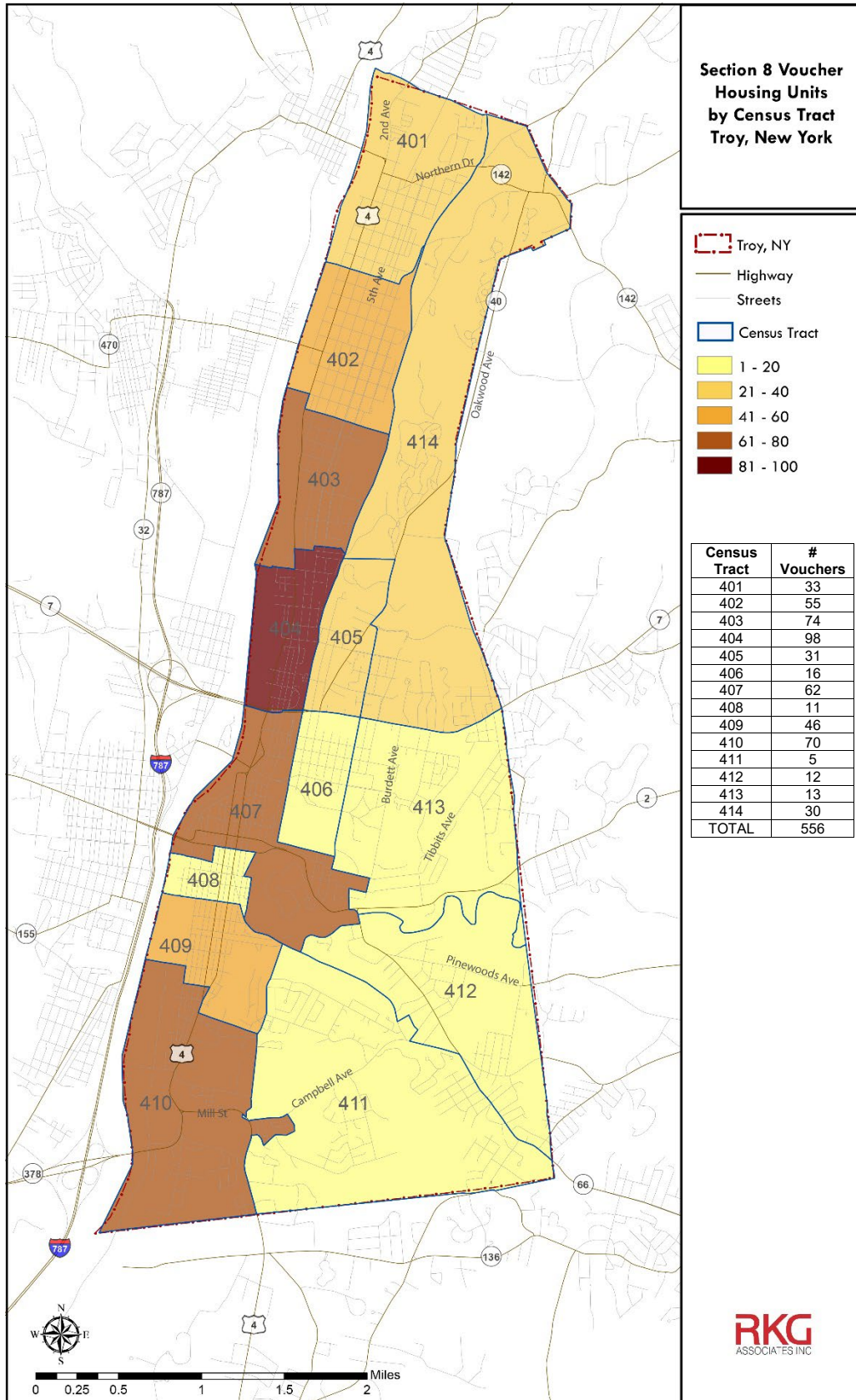
	TOTAL
Total	1,167
White	642
Black	513
American Indian/Alaska Native	12
Asian	0
Hawaiian/Pacific Islander	0
Hispanic	163
Elderly (62+)	148
Disabled	310
Percentage	
Total	100%
White	55%
Black	44%
American Indian/Alaska Native	1%
Asian	0%
Hawaiian/Pacific Islander	0%
Hispanic	14%
Elderly (62+)	13%
Disabled	27%

Source: Troy Housing Authority and RKG Associates, Inc., 2021

Map 3-15



Map 3-16



Q. HOUSING PROBLEMS

According to HUD, A household is identified as having a housing problem if they have any one or more of these four problems:

- Lack of complete kitchen facilities;
- Lack of complete plumbing facilities;
- Household is overcrowded which means there are more than 1.5 persons per room, excluding bathrooms, porches, foyers, halls, or half-rooms; and,
- Household is cost burdened (paying more than 30 percent of their income for housing).

Analyzing housing problems highlights areas where deferred maintenance has resulted in condition problems and eroded the housing stock. The HUD AFFH data indicates that 8,095 households have one or more housing problems, accounting for 40.8% of the total households in Troy. Proportionally, more Asian/Pacific Islander (63.8%) and African American (57.1%) households are experiencing greater housing problems compared to the other racial/ethnic groups in the City (Table 3-14).

Table 3-14

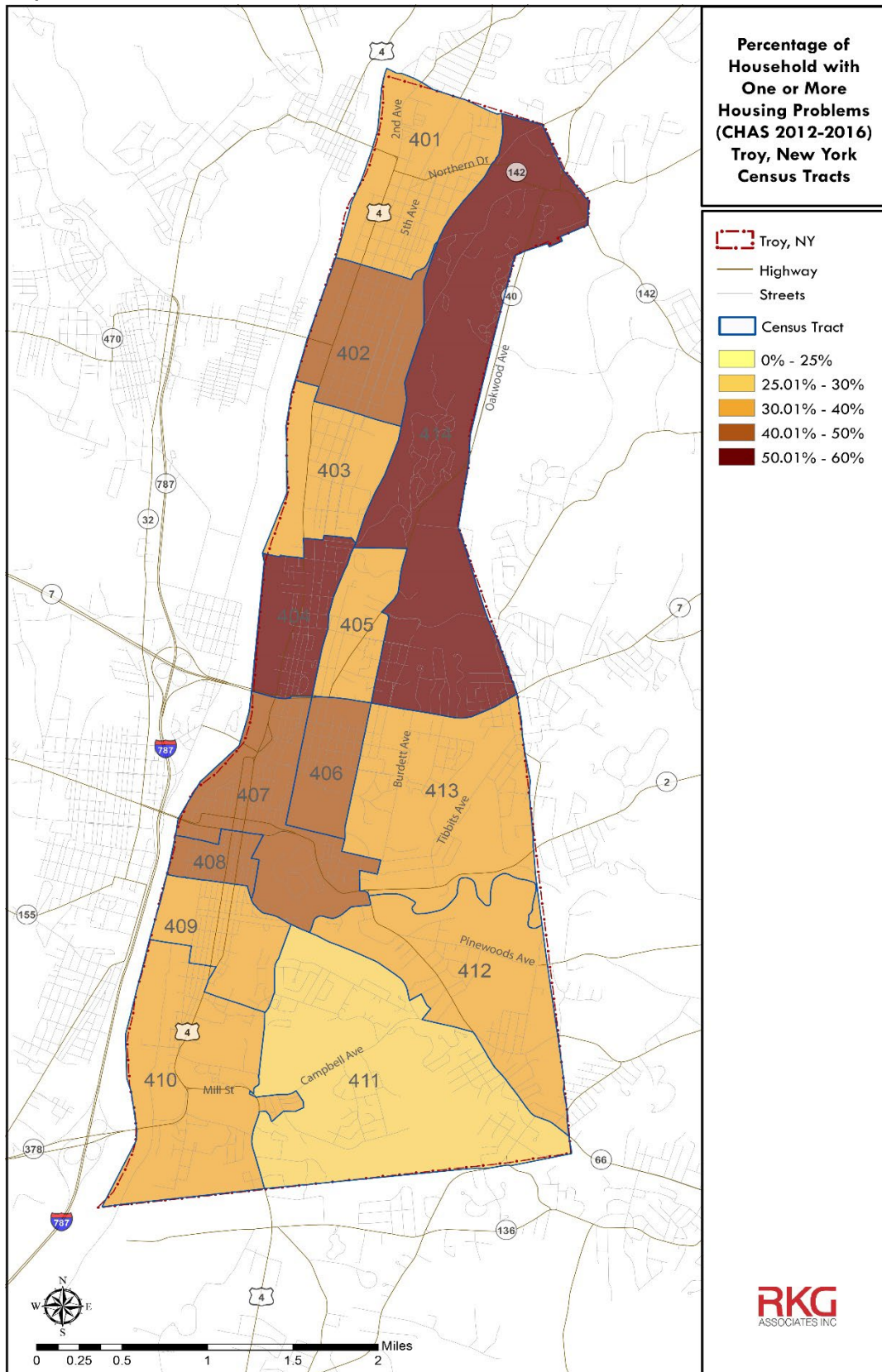
**Households with One or More Housing Problems
City of Troy, New York (CHAS 2012-2016)**

	Total Households	Households with One or More Housing Problems	
		Count	Percent
Total	19,835	8,095	40.81%
White, Non-Hispanic	14,625	5,195	35.52%
Black, Non-Hispanic	2,797	1,598	57.13%
Native American, Non-Hispanic	8	4	50.00%
Asian/Pacific Islander, Non-Hispanic	453	289	63.80%
Other Race, Non-Hispanic	576	233	40.45%
Hispanic	1,355	770	56.83%

Source: HUD AFFH Data Version AFFHT0006 and RKG Associates, Inc., 2021

The concentration of households with one or more housing problems also varies geographically. Areas with higher percentages of households experiencing one or more housing problems cluster on the west side of the City around the downtown area in Census Tracts 404, 406, 407, and 408, which also have a large number of publicly supported housing projects and Section 8 Voucher housing units in Troy. These neighborhoods have seen between 46% and 52% of their housing units having housing problems. These neighborhoods also have higher exposure to poverty, higher percentages of renters, lower environmental air quality, and lower labor market engagement, as displayed in previous maps. In addition, Census Tract 414 has the second highest percentage (51.2%) of households having housing problems, closely following Census Tract 404 (51.6%). These findings indicate a need for housing rehabilitation activities in these neighborhoods to ensure equal access to fair housing across the City (Map 3-17).

Map 3-17



R. COMPOSITE INDEX SCORE

To measure and evaluate the combined performance of all racial and ethnic groups in each census tract by combining all the previously presented demographic, housing, and fair housing indexes, RKG converted the value of all seven indicators into index scores that align with the HUD AFFH indexes (e.g., the Low Poverty Index) in scale and range. The seven indicators that were converted by RKG include:

Converted Indicators

- 2019 median household income,
- 2010-2019 average annual percent change of median household income,
- percentage of the minority population,
- percentage of people with disabilities,
- percentage of owner-occupied housing units,
- percentage of rental units that are affordable, and
- percentage of housing units with one or more housing problems.

HUD AFFH Indexes

- Low Poverty Index,
- School Proficiency Index,
- Job Proximity Index,
- Labor Market Engagement Index,
- Transit Trip Index,
- Low Transportation Cost Index, and
- Environmental Health Index

The consultant identified the highest average index values for all census tracts for each indicator and assigned it the highest index score. Then all other census tract values were converted to index scores as a percentage of the highest index value. In two instances (percentage of people with disability and percentage of housing units with one or more housing problems), the consultant assigned the highest index score to the lowest indicator value to reflect the actual meaning of the indicator. For example, the census tract with the lowest percentage of its population having a disability is considered to face fewer fair housing challenges compared to other census tracts, and this is reflected in the highest index score. As such, the higher the census tract's index score, the better its conditions were relative to the performance indicators.

The 14 census tracts were then ranked based on their total scores (Table 3-15), and the results (the lowest total score was ranked as 1, and the highest was ranked as 14) were then mapped in ArcGIS. The darker shading reflects a higher ranking and better fair housing opportunities, while lighter shades indicate that the census tracts face more fair housing challenges (Map 3-18). Readers should note that this is not an absolute measurement of the fair housing opportunities across the City's neighborhoods as the index score conversion is only an approximation aiming to bring all indicators into a comparable scale based on currently available data. Rather, this analysis provides readers with insights into the geographic concentration of fair housing issues across Troy, and opportunities to start to identify neighborhoods that need additional resources to increase their fair housing availability.

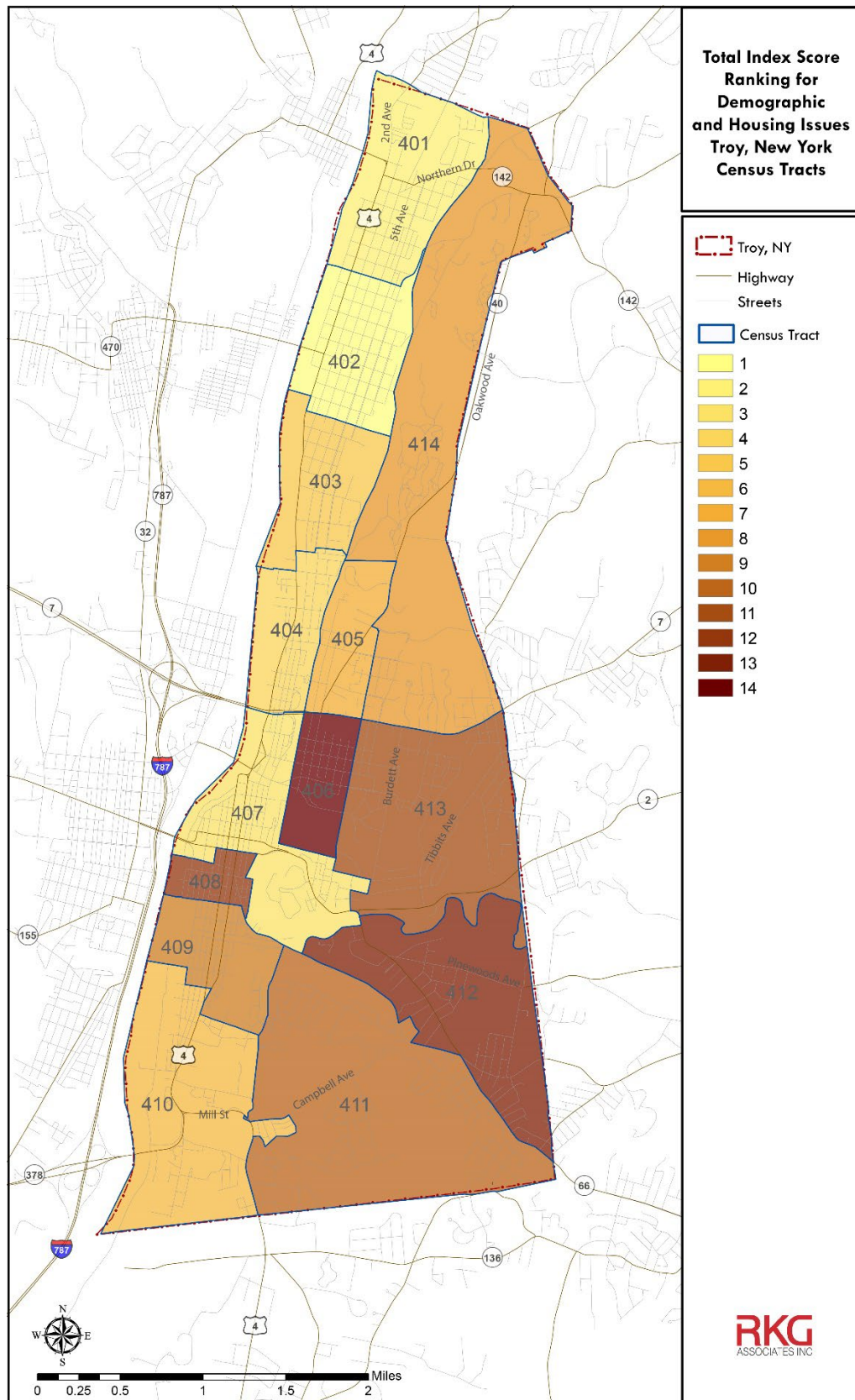
The analysis indicates that the best conditions exist in census tracts east of The Uncle Sam Bikeway in the City. The most challenged census tract is 402, followed by Census Tract 401, which is on the northwest side of the City. Other challenged census tracts include those around the downtown area where publicly assisted housing units and Section 8 voucher households cluster with concentrations of the non-White and Hispanic population.

Table 3-15
Index Scores for Demographic and Housing Issues
City of Troy, NY (Census Tracts)

Census Tract	Total Index Score	Ranking
401	623	2
402	587	1
403	697	5
404	657	4
405	708	7
406	871	14
407	639	3
408	816	12
409	734	9
410	704	6
411	784	10
412	860	13
413	792	11
414	710	8

Source: RKG Associates, Inc., 2021

Map 3-18



4 RECORD OF HOUSING DISCRIMINATION

A. INTRODUCTION

This section examined the records of housing discrimination complaints that originated in the City of Troy to analyze the types of existing fair housing issues. The Federal Fair Housing Act (FHA) of 1968, as amended in 1974 and 1988, prohibits housing discrimination based on race, color, religion, national origin, sex, disability, and familial status. Alleged violations of the FHA may be filed with:

- HUD Regional Office of Fair Housing and Equal Opportunity (FHEO)
- New York State Division of Human Rights, and
- New York State Division of Housing and Community Renewal, Fair and Equitable Housing Office

Fair housing complaints within Troy are under the administration of the U.S. Department of HUD, Buffalo Field Office in Buffalo, New York. Therefore, RKG reached out to HUD's Buffalo office to obtain the records of complaints filed with HUD.

B. U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives formal complaints regarding alleged violations of the FHA filed by individuals or organizations on behalf of the individuals. Fair housing complaints originating in Troy were obtained and analyzed for the period starting from January 1, 2016, through December 31, 2020. A total of eight complaints from Troy were filed with HUD's Buffalo Office (Table 4-1). Six of the complaints were related to Race/Color

Table 4-1
HUD Buffalo Field Office
Fair Housing Complaints, 2016-2020
City of Troy, NY

Category	2016	2017	2018	2019	2020	Total	Total Percent
Total Number of Cases	1	4	1	0	2	8	100.0%
Race or Color	1	2	1	0	2	6	33.3%
National Origin	0	0	0	0	0	0	0.0%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender)	0	2	0	0	1	3	16.7%
Familial Status	1	0	0	0	1	2	11.1%
Disability	0	3	1	0	0	4	22.2%
Age and/or Other Issue	0	0	0	0	0	0	0.0%
Marital Status	0	0	0	0	0	0	0.0%
Income Source (Section 8, etc.)	0	0	0	0	0	0	0.0%
LGBT Issue	0	0	0	0	0	0	0.0%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	0	0	0	0	0	0	0.0%
Opposed Discrimination/Retaliation	0	2	1	0	0	3	16.7%

Source: HUD Buffalo Field Office, 2021

issues, four of the HUD-filed complaints were related to Disability issues, three were related to Sex (Harassment/Gender/LGBT) issues, three were related to retaliation, and two were related to Familial Status issues. Note that a complaint can be related to more than one issue, for example, a complaint can be related to both disability and sex/color issues.

C. NEW YORK STATE DIVISION OF HUMAN RIGHTS

In 1945, New York State became the first state in the nation to enact legislation prohibiting discrimination in employment based on race, color, creed, and national origin. Under the Human Rights Law in New York, every citizen has an “equal opportunity to enjoy a full and productive life.” This law protects people from discrimination in areas such as employment, education, credit, and purchasing or renting a home or commercial space based on:

- Race
- Creed
- Color
- National origin
- Sexual orientation
- Military status
- Sex
- Age
- Marital status
- Domestic violence victim status
- Disability
- Pregnancy-related condition
- Predisposing genetic characteristics
- Prior arrest or conviction record
- Gender Identity or Expression
- Familial status
- Lawful source of income (in housing only)
- Retaliation for opposing unlawful discriminatory practices

People who feel they have been discriminated against can file a complaint with the Division of Human Rights. Once a complaint is filed, the Division of Human Rights will investigate and may present the case in a public hearing.

The consultants contacted the Division’s Freedom of Information Law (FOIL) department on September 8, 2021, through the Open FOIL NY online request system to request housing discrimination complaints filed in Troy between 2016 and 2020. The FOIL department acknowledged the receipt of such a request on September 28, 2021, and provided the requested data on November 19, 2021. In total, there were 10 cases filed in Troy between 2016 and 2020, with four filed in 2017, three filed in 2016, two in 2020, and one in 2019. Similar to HUD’s records, data from the New York State Division of Human Rights indicates that proportionally more complaints filed in Troy between 2016 and 2020 were based on Race/Color issues, with nine such complaints falling under this category. This is followed by Sex and Retaliation issues, with four cases filed respectively. Three cases were based on Disability issues. There were also two cases based on Familial Status issues, two based on Age issues, and two cases based on LGBT/Gender Identity/Expression issues. One case was based on Marital Status issues. Again, note that a complaint can be related to more than one issue. Table 4-2 summarizes the complaints by their bases and category obtained from the New York State Division of Human Rights.

Table 4-2
New York State Division of Human Rights
Fair Housing Complaints, 2016-2020
City of Troy, NY

Category	2016	2017	2018	2019	2020	Total	Percent
Total Number of Cases	3	4	0	1	2	10	100.0%
Race or Color	2	5	0	0	2	9	33.3%
National Origin	0	0	0	0	0	0	0.0%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender)	0	2	0	1	1	4	14.8%
Familial Status	1	0	0	0	1	2	7.4%
Disability	1	2	0	0	0	3	11.1%
Age and/or Other Issue	0	2	0	0	0	2	7.4%
Marital Status	0	1	0	0	0	1	3.7%
Income Source (Section 8, etc.)	0	0	0	0	0	0	0.0%
LGBT/Gender Identity/Expression	0	0	0	1	1	2	7.4%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	0	0	0	0	0	0	0.0%
Opposed Discrimination/Retaliation	0	3	0	1	0	4	14.8%

Source: New York State Division of Human Rights, 2021

D. NEW YORK STATE DIVISION OF HOUSING AND COMMUNITY RENEWAL FAIR AND EQUITABLE HOUSING OFFICE

The New York State Division of Housing and Community Renewal (HCR) established a new Fair and Equitable Housing Office (FEHO) in January 2015. The mission of the FEHO is to ensure New Yorkers have an equal opportunity to live in housing they desire and can afford regardless of race, color, familial status, religion, sex, disabilities, national origin, marital status, age, and sexual orientation. Specifically, this includes:

- The office is committed to removing barriers to fair housing at the state level and to affirmatively further fair housing.
- FEHO looks at how HCR's public investments affect the larger housing market and works to engage our partners to ensure affordable housing is available in all areas of the State.
- FEHO provides education and outreach.
- FEHO oversees Section 3 compliance of grantees/subgrantees to ensure that economic opportunities generated by U.S. Department of Housing and Urban Development (HUD) financial assistance are, to the greatest extent feasible, directed to low- and very low-income persons.

RKG also reached out to the FEHO to request the housing discrimination complaint data of Troy on September 2nd, 2021. However, the office has not responded to RKG's request as of the time this report was written.

E. SUMMARY

Table 4-3 combines the data obtained from the New York State Division of Human Rights and HUD Buffalo Field Office. It shows that proportionally more cases filed in Troy between 2016 and 2020 were based on Race/Color issues, with 15 complaints falling under this category. This is followed by

Sex, Disability, and Retaliation issues, with seven cases filed for these reasons, respectively. Four cases were based on Familiar Status issues, two were based on Age, and two were based on LGBT/Gender Identity/Expression issues. One case was based on Marital Status issues.

In total, there were 18 cases filed in Troy during these five years to the New York State Division of Human Rights and HUD Buffalo Field Office combined. Among them, eight cases were filed in 2017, four were filed in 2016, and four were filed in 2020. 2018 and 2019 each got one case filed. This shows that housing discrimination complaints generated in Troy peaked in 2017 before falling in 2018 and 2019. However, there was an uptick in discrimination complaints in 2020 as well.

Table 4-3
New York State Division of Human Rights & HUD Buffalo Field Office
Fair Housing Complaints, 2016-2020
City of Troy, NY

Category	2016	2017	2018	2019	2020	Total	otal Percent
Total Number of Cases	4	8	1	1	4	18	100.0%
Race or Color	3	7	1	0	4	15	33.3%
National Origin	0	0	0	0	0	0	0.0%
Religion	0	0	0	0	0	0	0.0%
Sex (Harassment/Gender)	0	4	0	1	2	7	15.6%
Familial Status	2	0	0	0	2	4	8.9%
Disability	1	5	1	0	0	7	15.6%
Age and/or Other Issue	0	2	0	0	0	2	4.4%
Marital Status	0	1	0	0	0	1	2.2%
Income Source (Section 8, etc.)	0	0	0	0	0	0	0.0%
LGBT/Gender Identity/Expression	0	0	0	1	1	2	4.4%
Criminal/Arrest Issue	0	0	0	0	0	0	0.0%
Renters' Rights & Other	0	0	0	0	0	0	0.0%
Opposed Discrimination/Retaliation	0	5	1	1	0	7	15.6%

Source: New York State Division of Human Rights and HUD Buffalo Field Office, 2021

5 REVIEW OF PUBLIC SECTOR POLICIES

A. INTRODUCTION

Public policies set the direction for a city's socioeconomic trends and development prospects and priorities. They influence numerous facets of residents' life and establish principles to distribute resources. Policies, practices, or procedures that appear neutral when taken at face value, may deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, or national origin and create impediments to fair housing choice.

An element of the Analysis of Impediments to Fair Housing Choice includes an examination of a city's policies in terms of their impact on housing choice. This section evaluates the current City policies to determine opportunities for accelerating the expansion of fair housing choices.

B. POLICIES GOVERNING THE INVESTMENT OF FUNDS FOR HOUSING AND COMMUNITY DEVELOPMENT

An examination of the City's current budget is essential for understanding how the financial resources in support of fair housing choices have increased or declined over the past few years. According to Troy's 2010 Analysis of Impediments to Fair Housing, The City received federal entitlement funds directly and indirectly from HUD primarily in the form of:

- **Community Development Block Grants (CDBG):** The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low- and moderate-income levels. Funds can be used for a wide array of activities, including housing rehabilitation, homeownership assistance, lead-based paint remediation, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.
- **HOME Investment Partnerships Program:** The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low- and moderate-income households. HOME funds can be used for activities that promote affordable rental housing and homeownership by low- and moderate-income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.
- **Emergency Solutions Grant (ESG):** The ESG program provides federal funds to provide homeless persons with basic shelter and essential supportive services. The funds can also be used for short-term homeless prevention assistance to low- and moderate-income (LMI) households.

1. Project Funding Criteria

Funding allocations follow the principle of meeting high priority needs across the City for projects primarily benefiting low- and moderate-income residents. The assignment of funding priorities is based

on meeting the statutory requirements of the CDBG, HOME, and ESG programs, input from members of housing and community services, public meetings, and public hearings. Every five years, the City of Troy Housing and Community Development Department is required to prepare a 5-year Consolidated Plan as a federal funding grantee, which provides guidelines for annual allocations of received funds. For each year included in the Consolidated Plan, the City is also required to prepare an Annual Action Plan, showing how annual entitlement funds will be distributed to meet the overall 5-year goals.

2. Distribution of Funds

In general, the City does not have self-administered programs directly promoting affordable housing creation and renovation under CDBG or HOME programs. Instead, the City mostly outsources these programs to local and regional community service organizations.

- **Community Development Block Grant (CDBG):** Table 5-1/Map 5-1 displays how the City utilized the CDBG funds by program type and location of the projects, and the allocated amounts over the past six Fiscal Years.

The CDBG Program requires that most activities benefit low- to moderate-income persons, which are defined by HUD as persons with household incomes below 80% of the area median income. Most of the designated projects will directly serve Troy residents who qualified based on their income or other criteria.

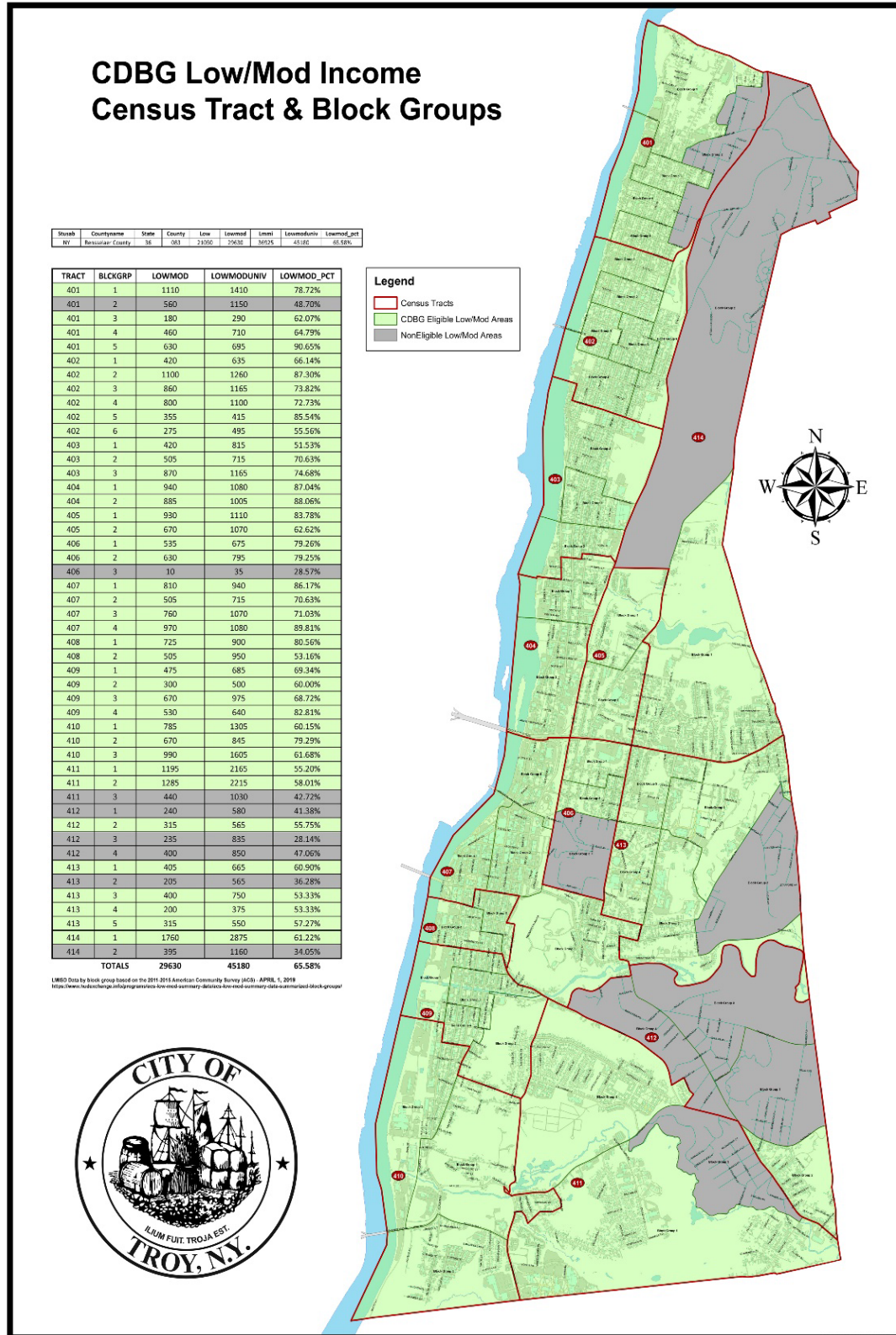
Table 5-1

**Uses of HUD Community Development Block Grant Funds 2016-2021
City of Troy, New York**

FFY 2016 Activities	Amount
Administration and Planning (Housing Department)	\$295,167
Neighborhood Livability	\$350,000
Recreation (Recreation Department)	\$75,000
Code Enforcement (Code Enforcement)	\$275,000
Lansingburgh Reinvestment Target Areas (Housing Department)	\$1,000,000
Lansingburgh Reinvestment Target Area	\$1,000,000
TOTAL FFY 2016	\$1,645,167
FFY 2017 Activities	Amount
Administration and Planning (Housing Department)	\$292,624
Neighborhood Livability	\$346,984
Recreation (Recreation Department)	\$74,354
Code Enforcement (Code Enforcement)	\$272,630
Lansingburgh Reinvestment Target Areas (Housing Department)	\$991,383
Lansingburgh Reinvestment Target Area	\$450,000
South Troy Reinvestment Target Area	\$450,000
CDBG Planning & Administration	\$91,383
TOTAL FFY 2017	\$1,630,991
FFY 2018 Activities	Amount
Administration and Planning (Housing Department)	\$316,226
Neighborhood Livability	\$340,586
Recreation (Recreation Department)	\$65,586
Code Enforcement (Code Enforcement)	\$275,000
South Troy Reinvestment Target Areas (Housing Department)	\$1,100,000
South Troy Reinvestment Target Area	\$1,010,000
CDBG Planning & Administration	\$90,000
TOTAL FFY 2018	\$1,756,812
FFY 2019 Activities	Amount
Administration and Planning (Housing Department)	\$292,624
Neighborhood Livability	\$270,000
Code Enforcement (Code Enforcement)	\$270,000
South Troy Reinvestment Target Areas (Housing Department)	\$1,219,237
South Troy Reinvestment Target Area	\$1,174,237
CDBG Planning & Administration	\$45,000
TOTAL FFY 2019	\$1,781,861
FFY 2020 Activities	Amount
Administration and Planning (Housing Department)	\$292,380
Neighborhood Livability	\$350,000
Code Enforcement (Code Enforcement)	\$275,000
Parks and Recreation (Parks Department)	\$75,000
Reinvestment Target Area Year 1 (Housing Department)	\$1,186,577
Little Italy	\$1,186,577
TOTAL FFY 2020	\$1,828,957
FFY 2021 Activities	Amount
Administration and Planning (Housing Department)	\$200,000
Neighborhood Livability	\$275,000
Code Enforcement (Code Enforcement)	\$200,000
Parks and Recreation (Parks Department)	\$75,000
South Troy Reinvestment Target Areas (Housing Department)	\$1,349,319
South Central Troy (Little Italy) Reinvestment Target Area	\$1,349,319
TOTAL FFY 2021	\$1,824,319

Source: City of Troy, NY, 2021

Map 5-1



The other infrastructure or neighborhood projects are area benefit activities, or projects located in parts of the City where over half the residents have low or moderate incomes. Projects in other areas of the City are eligible for CDBG funding if they individually benefit low- or moderate-income individuals or persons who meet other HUD criteria including those of a presumed benefit.

The City's CDBG funding allocations have been steadily increasing between FY2016 and FY2021 by 10.9%, which is a positive trend. In addition to administration and planning expenditures, the City has been providing annual funding to improve neighborhood livability through recreation and code enforcement measures, as well as funding to the Housing Department for Reinvestment Target Areas.

According to the City's 2020-2024 5-Year Consolidated Plan, the Code Enforcement program is to enforce code restrictions to ensure safe affordable housing and to provide a suitable living environment. The program also assists in Property Inspections of over 100 HIP clients and ensures that landlords are maintaining code compliance on their properties for the safety of the City residents. The Recreation Improvement projects consist of project-based improvements at the 20+ parks locations to improve the safety conditions, access, and projects that expand recreational opportunities for the City residents. The South-Central Little Italy Troy Reinvestment Target Area Phase 1 and 2 will consist of targeted infrastructure improvement and neighborhood quality of life improvements including, sidewalks and curbing replacement, milling, and paving, streetscape improvements, public safety, and neighborhood park improvements. This is part of a two and a half years project (2020-2022) with CDBG funding totaling \$2.3 million.

The City's annual CDBG allocation to Neighborhood Livability has been declining between FY2016 and FY2019 by 22.9%, before rebounding in FY2020 to \$350,000 and then reducing to \$275,000 in FY2021. Between FY2016 and FY2021, the CDBG allocation to Neighborhood Livability was reduced by 21.4%. The Recreation program funding fluctuated but stayed relatively stable. However, the CDBG allocation for the Code Enforcement program declined from \$275,000 to \$200,000 between FY2016 and FY2021 by 27.3%. In addition, the Neighborhood Livability programs accounted for 21.3% of the annual CDBG allocation in FY2016 and FY2017, but the share declined to 15.1% in FY2021.

The Reinvestment Target Areas program, on the other hand, has been receiving increasing CDBG allocations between FY2016 and FY2021, accounting for 60.8% of the City's annual CDBG allocation in FY2016 and 74.0% in FY2021. The Reinvestment Target Areas program received \$1,000,000 in FY2016 and the allocation rose to \$1,349,319 in FY2021 by 34.9%.

It is anecdotally observed that the City has a lot of substandard and abandoned housing properties that violate housing codes. However, there is not enough funding for code enforcement efforts in the City. This resonates with the declining CDBG allocation that the Code Enforcement program has been receiving since FY2016. It is recommended that the City consider increasing CDBG allocations and expanding funding sources (such as private and institutional donations, and developer contributions) for the Code Enforcement program. Though the Reinvestment Target Area program is as important, the Code Enforcement program should receive more CDBG allocations to improve the housing quality and to increase the number of habitable housing options in the City.

- **HOME Investment Partnerships Fund (HOME):** The HOME Investment Partnerships Program (HOME) is the largest Federal block grant designed exclusively to create affordable housing for low-income households. The HOME program requires that participating state or local governments match every dollar in program funds with 25 cents from nonfederal sources, which

may include donated materials or labor, the value of donated properties, proceeds from bond financing, and other resources. At least 15% of the allocations must be reserved to fund housing to be owned, developed, or sponsored by experienced, community-driven nonprofit groups designated as Community Housing Development Organizations (CHDOs). Participating jurisdictions must also ensure that HOME-funded housing units remain affordable in the long term (20 years for new construction of rental housing; 5-15 years for construction of homeownership housing and housing rehabilitation). For rental housing and rental assistance, at least 90% of benefiting families must have incomes that are no more than 60% of the HUD-adjusted area median family income. In rental projects with five or more assisted units, at least 20% of the units must be occupied by families with incomes at or below 50% of the HUD-adjusted median. The households receiving HUD assistance must be low- or moderate-income, which is below 80% of the area median.

Troy's FY2021 HOME allocation dropped by 6.4% compared to FY2016, despite fluctuations during the interim years. This is a negative trend, as the City's allocations for the HOME Homebuyer Incentive Program for the Troy Rehabilitation & Improvement Program, Inc. (TRIP) also decreased by 40.0% from \$250,000 in FY2016 to \$150,000 in FY2021. Though the City's 2020-2024 5-Year Consolidated Plan established "increasing homeownership opportunities" as one of its objectives and goals, the decreasing HOME allocations to the Homebuyer Incentive Program administered by TRIP contradicts this goal. It is recommended that the City ensures steady and even additional funding for the Homebuyer Incentive Program going forward.

One advancement has been that the HOME allocation for the Community Housing Development Organization (CHDO) Housing Project Rehab/New Construction program has increased by 63.0% from \$169,369 (36.3% of the total HOME allocation) in FY2016 to \$276,006 (63.3% of the total HOME allocation) in FY2021.

Table 5-2

**Uses of HUD HOME Funds 2016-2021
City of Troy, New York**

FFY 2016 Activities	Amount
HOME Administration (Housing Department)	\$46,597
HOME Homebuyer Incentive Program (TRIP)	\$250,000
CHDO Housing Project Rehab/New Construction (CHDO)	\$169,369
TOTAL FFY 2016	\$465,966
FFY 2017 Activities	Amount
HOME Administration (Housing Department)	\$36,095
HOME Homebuyer Incentive Program (TRIP)	\$200,000
CHDO Housing Project Rehab/New Construction (CHDO)	\$124,863
TOTAL FFY 2017	\$360,958
FFY 2018 Activities	Amount
HOME Administration (Housing Department)	\$47,546
HOME Homebuyer Incentive Program (TRIP)	\$200,000
CHDO Housing Project Rehab/New Construction (CHDO)	\$227,918
TOTAL FFY 2018	\$475,465
FFY 2019 Activities	Amount
HOME Administration (Housing Department)	\$35,000
HOME Homebuyer Incentive Program (TRIP)	\$100,000
CHDO Housing Project Rehab/New Construction (CHDO)	\$271,222
TOTAL FFY 2019	\$406,222
FFY 2020 Activities	Amount
HOME Administration (Housing Department)	\$35,000
HOME Homebuyer Incentive Program (TRIP)	\$200,000
CHDO Housing Project Rehab/New Construction (Habitat for Humanity)	\$212,000.40
TOTAL FFY 2020	\$447,000.40
FFY 2021 Activities	Amount
HOME Administration (Housing Department)	\$10,000
HOME Homebuyer Incentive Program (TRIP)	\$150,000
CHDO Housing Project Rehab/New Construction (CHDO)	\$276,006
TOTAL FFY 2021	\$436,006

Source: City of Troy, NY, 2021

- **Emergency Shelter Grant (ESG):** The current Emergency Solutions Grant Program (ESG) award amount for FY2021 is \$156,002, which funds sub-recipients for homeless prevention activities (CARES, YWCA, Roarke Center, Unity House, TAUM, Josephs House, Catholic Charities) through the City's Rapid Rehousing, Emergency Shelter and Homeless Prevention Programs. The biggest sub-recipient of the City's ESG allocation in FY2021 is Joseph's House's Emergency Shelter program, accounting for 32.2% of the total ESG award, followed by Unity House's Homeless Prevention and Emergency Shelter programs (25.5%) and YWCA's Homeless Prevention program (10.4%). The City's ESG award increased by 5.0% between FY2016 and FY2021, which is a positive trend.

Compared to FY2016, almost all sub-recipients' allocations increased in FY2021, except for TAUM's Homeless Prevention program and YWCA's Homeless Prevention program, with their ESG allocations dropping by 24.8% and 0.1%, respectively, between FY2016 and FY2021 (Table 5-3).

- **Troy Housing Authority:** The total subsidies that the Troy Housing Authority received from sources such as HUD and other government grants between 1/1/2020 and 12/31/2020 was \$16,179,826.05, which includes \$11,036,690.05 for the Section 8 program and \$5,143,136 for project-based housing programs. This has increased by 52.4% from \$10,613,665.09 in the calendar year of 2016 (1/1/2016 to 12/31/2016) after some fluctuations, which is a positive trend.

C. PUBLIC HOUSING AND SECTION 8 VOUCHER PROGRAMS

The Troy Housing Authority is responsible for the administration of Rental Assistance Demonstration (RAD) Project Based Voucher units (formerly public housing), some Low-Income Housing Tax Credit projects, and the Section 8 Housing Choice Voucher units. Table 5-4 shows the publicly assisted housing projects in Troy by category. Maps 5-2 and 5-3 identify the locations of the publicly assisted housing projects and the number of Section 8 voucher units by census tract in Troy, respectively. It should be noted that due to privacy concerns, the Troy Housing Authority did not share the actual locations of the Section 8 Housing Voucher units with the consultant.

Table 5-3

Uses of HUD Emergency Shelter Grant Funds 2016-2021

City of Troy, New York

FFY 2016 Activities	Amount
ESG Administration (CARES)	\$11,148
CARES - HMIS	\$10,000
YWCA - Homeless Prevention	\$16,274
Roarke Center - Prevention	\$11,347
Unity House - Prevention/Emergency Shelter	\$37,443
TAUM - Rapid Rehousing	\$11,164
TAUM - Homeless Prevention	\$3,107
Joseph's House - Emergency Shelter	\$48,160
TOTAL FFY 2016	\$148,644
FFY 2017 Activities	Amount
ESG Administration (CARES)	\$11,105
CARES - HMIS	\$10,000
YWCA - Homeless Prevention	\$16,211
Roarke Center - Prevention	\$11,303
Unity House - Prevention/Emergency Shelter	\$37,299
TAUM - Rapid Rehousing	\$11,121
TAUM - Homeless Prevention	\$3,095
Joseph's House - Emergency Shelter	\$47,976
TOTAL FFY 2017	\$148,110
FFY 2018 Activities	Amount
ESG Administration (CARES)	\$11,011
CARES - HMIS	\$10,000
YWCA - Homeless Prevention	\$16,059
Roarke Center - Prevention	\$11,197
Unity House - Prevention/Emergency Shelter	\$36,949
TAUM - Rapid Rehousing	\$11,017
TAUM - Homeless Prevention	\$3,066
Joseph's House - Emergency Shelter	\$47,527
TOTAL FFY 2018	\$146,826
FFY 2019 Activities	Amount
ESG Administration (CARES)	\$11,180
CARES - HMIS	\$10,000
YWCA - Homeless Prevention	\$16,323
Roarke Center - Prevention	\$11,197
Unity House - Prevention	\$6,858
Unity House - Emergency Shelter	\$30,700
TAUM - Rapid Rehousing	\$12,282
TAUM - Homeless Prevention	\$2,033
Joseph's House - Emergency Shelter	\$48,311
TOTAL FFY 2019	\$148,884
FFY 2020 Activities	Amount
Planning and Administration	\$11,742
ESG Administration (CARES)	\$11,742
Emergency Shelter	\$82,550
Joseph's House - Emergency Shelter	\$50,475
Unity House - Emergency Shelter (DVS)	\$32,075
Homelessness Prevention	\$39,748
Roarke Center - Emergency Assistance Program	\$13,151
Unity House - Homelessness Prevention	\$7,924
TAUM - Furniture Program	\$2,349
YWCA - Homelessness Prevention	\$16,324
Rapid Rehousing	\$12,528
TAUM - Furniture Program	\$12,528
Homeless Management Information Systems	\$10,000
CARES - ESG HMIS	\$10,000
TOTAL FFY 2020	\$156,568
FFY 2021 Activities	Amount
ESG Administration (CARES)	\$11,700
CARES - HMIS	\$10,000
YWCA - Homeless Prevention	\$16,259
Roarke Center - Prevention	\$13,098
Unity House - Prevention	\$7,890
Unity House - Emergency Shelter	\$31,954
TAUM - Rapid Rehousing	\$12,478
TAUM - Homeless Prevention	\$2,335
Joseph's House - Emergency Shelter	\$50,287
TOTAL FFY 2021	\$156,002

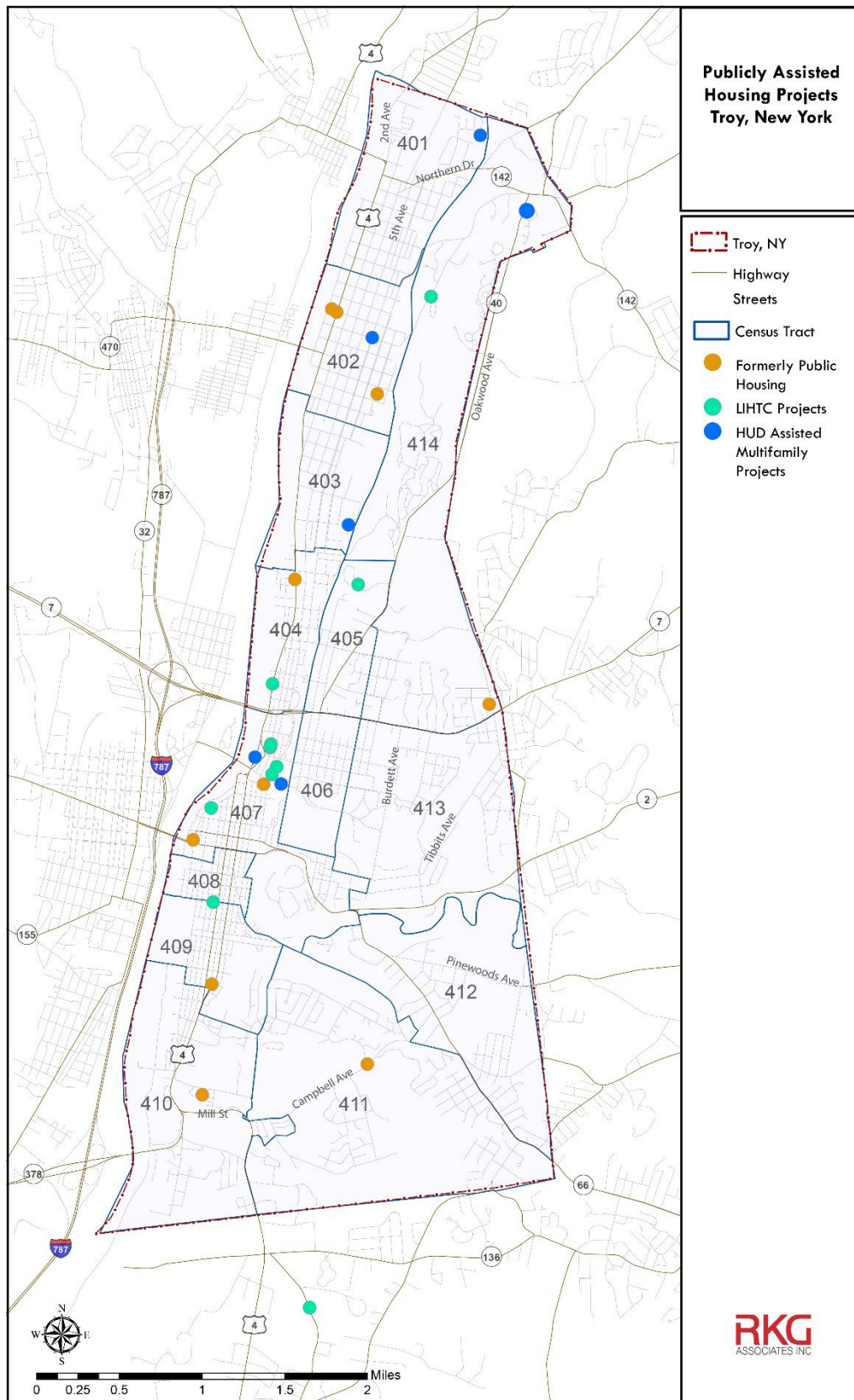
Source: City of Troy, NY, 2021

Table 5-4
Publicly Assisted Housing Projects
City of Troy, New York

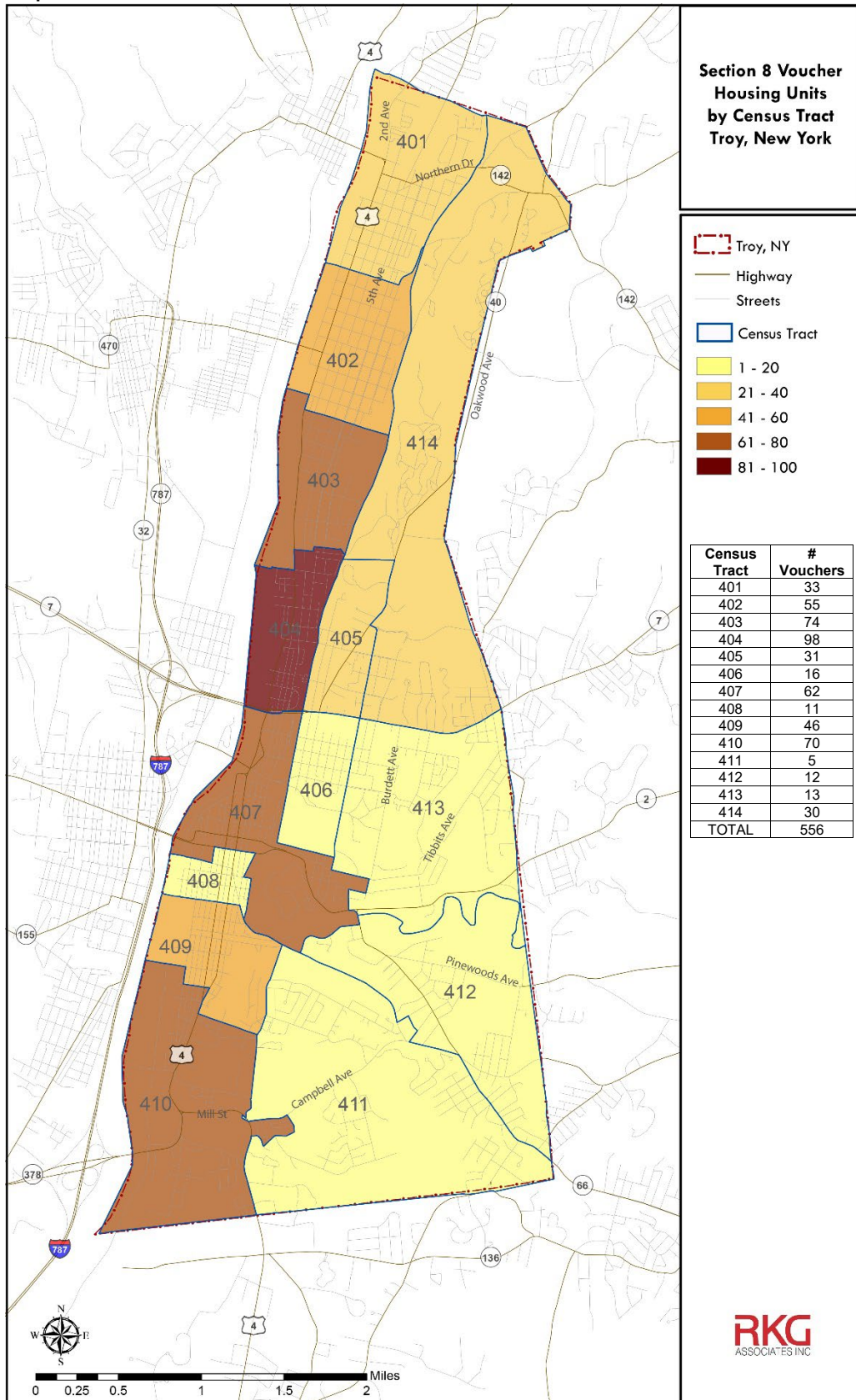
	Population Served	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom	TOTAL	TOTAL Low Income Units
Section 8 Voucher	General							556	556
Rental Assistance Demonstration (RAD) Project Based Voucher Units (formerly Public Housing)									
Corliss Park Apartments	General		4	106	36	38		184	184
Taylor Apartment, Bldg 3 & 4	General		8	108	9			125	125
Arnold E. Fallon Apartments	General		2	30	8			40	40
Catherine M. Sweeney Apartments	General		2	18	4			24	24
Margaret W. Phelan Apartments	General		36	16	26	10		88	88
Grand Street Apartments	General	3	23	14	2			42	42
Griswold Heights Apartments	General			286	69	30	5	390	390
Edward A. Kane Apartments	Elderly (62+)		60					60	60
Conway Court Apartments	Elderly (62+)		40					40	40
Guenette Apartments, 6-8 115th Street	Veterans		8					8	8
Low Income Housing Tax Credit Projects									
Martin Luther King	General			22	49	12		83	83
John F Kennedy Towers	Elderly (55+)		135					135	135
	General (19 Units for Domestic Violence Survivors)								
Tapestry On The Hudson	General		34	33				67	61
Diamond Rock Terrace	General							81	81
Diamond Rock Terrace Phase II (Federal)	General			36				36	36
O'Neil Apartments	General	13	122	1				123	121
Monument Square Apartments	General		76					89	88
Van Rensselaer Apartments	General		49					49	49
2251-2255 Fifth Ave	General			1	1	1		3	3
2239 Fifth Ave	General	1		1	1			3	3
2243 Fifth Ave	General			3				3	3
2247 Fifth Ave	General				2	1		3	3
School 10	General		2	13	5			20	20
Other HUD Assisted Multifamily Projects									
Tenth Avenue (Section 202)	Elderly (62+)		6					6	6
Rensselaer County Community Residential (Section 202)	Elderly (62+)		8					8	8
OPEC Housing (Section 202 & Section 811)	Elderly (62+)/Disabled		12					12	12
Ninth Street NSA I	General		10	25	5			40	40
Ninth Street NSA II	General		19	21	32	8		80	80
Burns Apartments	General		99					99	99
Lansingburgh Apartments	General	23	72					95	95
TOTAL								2,252	2,243

Source: City of Troy Housing Authority, HUD LIHTC Database Access, HUD Resource Locator, and RKG Associates, Inc., 2021

Map 5-2



Map 5-3



Currently, there are 12,652 applicants on the waiting list for Troy's Rental Assistance Demonstration (RAD) Project Based Voucher units (formerly public housing) in total. Proportionally more applicants (48%) on the waiting list are Black/African American, followed by White applicants (41%). 16% identified as Hispanic/Latino. Most of the applicants need one-bedroom units, accounting for 71%, followed by two-bedroom (14%) and three-bedroom units (12%).

The vast majority (98% to 99%) of the elderly (62+), disabled and single applicants need one-bedroom units, as these applicants most likely live on their own or with a spouse. In comparison, proportionally more family applicants need two-bedroom units (37%), followed by three-bedroom units (35%). In total, 6% of the applicants are elderly people aged above 62, 6% of the applicants are disabled, 35% of the applicants are in family households, and over half (53%) of the applicants on the waiting list are single persons (Table 5-5).

An estimated 658 applicants are currently on the waiting list for the Section 8 Voucher program, with 62% of them being Black/African American, followed by 30% identified as White. 17% identified by Hispanic/Latino. The majority (62%) of the Section 8 Voucher applicants are in family households, and 31% are single persons. 6% are elderly applicants over 62, and 2% are disabled (Table 5-6).

Table 5-5

Current Applicants for Public Housing Waiting List, 2021
City of Troy, New York

	Studio	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom	5-Bedroom	TOTAL
Total	2	8,994	1,724	1,560	335	37	12,652
Race/Ethnicity							
White	1	3,959	635	501	112	13	5,221
Black/African American	1	4,059	918	915	194	21	6,108
American Indian/Alaska Native	0	100	17	13	4	0	134
Asian	0	79	8	4	0	0	91
Native Hawaiian/Other Pacific Islander	0	34	2	1	1	1	39
Not Assigned	0	763	144	126	24	2	1,059
Hispanic	1	1,265	332	344	92	6	2,040
Family Composition							
Elderly (62+)	0	764	13	0	0	0	777
Disabled	0	760	4	3	7	0	774
Family	1	852	1,653	1,552	328	37	4,423
Single	1	6,618	54	5	0	0	6,678
PERCENT DISTRIBUTION							
Total	0%	71%	14%	12%	3%	0%	100%
Race/Ethnicity							
White	0%	76%	12%	10%	2%	0%	41%
Black/African American	0%	66%	15%	15%	3%	0%	48%
American Indian/Alaska Native	0%	75%	13%	10%	3%	0%	1%
Asian	0%	87%	9%	4%	0%	0%	1%
Native Hawaiian/Other Pacific Islander	0%	87%	5%	3%	3%	3%	0%
Not Assigned	0%	72%	14%	12%	2%	0%	8%
Hispanic	0%	62%	16%	17%	5%	0%	16%
Family Composition							
Elderly (62+)	0%	98%	2%	0%	0%	0%	6%
Disabled	0%	98%	1%	0%	1%	0%	6%
Family	0%	19%	37%	35%	7%	1%	35%
Single	0%	99%	1%	0%	0%	0%	53%

Source: Troy Housing Authority and RKG Associates, Inc., 2021

The current average wait time for Section 8 voucher units is 148 days, and the average wait time for the project-based housing units administered by the Troy Housing Authority is 850 days. The total average wait time for the Section 8 program and the project-based units combined is 803 days. The most sought-after property is the Sweeney Apartments, which has the longest wait time of 1,563 days. The longest wait time (746 days) is for one-bedroom units, which is also the most sought-after unit type for applicants on the waiting list, followed by 522 days for studios, as there are only three studio units in THA administered housing projects.

Table 5-6
Current Applicants on Section 8 Voucher Program Waiting List, 2021
City of Troy, New York

	Number	Percent
Total	658	100%
Race/Ethnicity		
White	197	30%
Black/African American	409	62%
American Indian/Alaska Native	8	1%
Asian	2	0%
Native Hawaiian/Other Pacific Islander	1	0%
Not Assigned	41	6%
Hispanic	110	17%
Family Composition		
Elderly (62+)	41	6%
Disabled	10	2%
Family	405	62%
Single	202	31%

Source: Troy Housing Authority and RKG Associates, Inc., 2021

THA is also working with the Troy Local Development Corporation (TLDC) to redevelop the John P. Taylor Apartments owned by THA. On October 28, 2019, the THA, in collaboration with the TLDC, announced the selection of Pennrose, LLC (Pennrose) as its development partner for this revitalization project. The first phase involves demolishing and redeveloping the two existing vacant buildings Taylor 1 and 2 Towers which total 143 units. The City of Troy has allocated \$2 million towards the demolition of the Taylor 1 and 2 buildings and may consider allocating more if necessary. The two new buildings will add 141 new affordable units, which will be income-restricted based on the HUD statute. These two buildings will be a mixed-income, mixed-use subsidized rental project for the workforce population, and will include units for both RAD and Project Based Voucher subsidies. The John P. Taylor Apartments project is located just south of the historic downtown. The estimated delivery time for the Taylor Phase 1 is late 2023 provided all funding for the project is timely secured.

THA is also working to revitalize the rest of its housing properties for aesthetic and physical upgrades. This also includes increasing ADA-compliant accessible units within the existing portfolio to meet the increasing demand.

D. PRIVATE HOUSING PROGRAMS

The City of Troy supports a range of services and programs that meet the needs of low- and moderate-income households, including those with special needs. The following programs focus on private sector housing:

- **Owner-Occupied Exterior Enhancement Program:** The CDBG-funded program aims to eliminate housing deficiencies by providing financial and technical assistance to homeowners in a designated target area. Grant amounts may not exceed \$5,000 and can only be applied to homeowner-occupied residences for services including emergency lead base paint remediation. If the cost of repair exceeds the grant amount, the homeowner can contribute to the balance of expenses incurred over \$5,000 to complete the necessary repair.
- **Rensselaer County/TRIP Lead Safe Home HUD Grant Program:** The Lead Safe Home works closely with TRIP (Troy Rehabilitation & Improvement Program) to provide assistance for homeowners, landlords, and their tenants to abate found lead paint hazards. The target of the program is households with children aged six and younger who reside or visit part-time (at least

2 days per week, 3 hours per day), any Rensselaer County property (not a specific zip code), exterior and interior painting needs, and replacement of windows (must have old windows that need to be replaced) and doors. Criteria for owners include:

- 1) Mortgage and Taxes must be paid up to date.
- 2) Most homes built before 1978 or where lead-based paint becomes a hazard when it chips, peels, and flakes causing lead dust.
- 3) Liens will be placed on the properties for three years to ensure that the same income level families remain after work is complete.
- 4) Owners will be required to keep rents at the same level for three years or only increase rents at annual rates of inflation.
- 5) Properties where owners or tenants qualify as very-low- and low-income families (Income eligibility for the program is based on the income of the tenants and not the landlord).
- 6) The limit is \$20,000 per unit relating to lead issues only. Each unit on the apartment floor is considered a different project.

Criteria for Applicants:

- 1) Income must qualify as very-low- and low-income families. Income eligibility for the program is based on the income of the tenants and not the landlord.
 - 2) Owner-occupied properties may earn up to 80% of the regional median income (RMI) based on family size.
 - 3) Rental single-family properties must be inhabited by a family earning 50% or less of the RMI.
 - 4) Rental properties with two units or more must have all tenants with incomes of 80% RMI or less, with at least half the units with tenants with incomes of 50% RMI or less.
 - 5) Housing Choice Voucher Program (formerly known as Section 8) units are eligible.
- **Mini-Repair Program:** The Mini-Repair program run by Rensselaer County Housing Resources (RCHR) provides free labor to eligible homeowners for minor repairs. The Homeowner is responsible for the cost of materials. An eligible applicant must own the home, and the home must be in Rensselaer County. Applicants that are disabled or elderly, must have a household income under 80% AMI. Applicants that are not disabled or elderly must have a household income under 50% AMI to qualify. Eligible mini repairs include porch and stair repairs, screen repairs, installing handrails, minor furniture, and carpet repair, minor roof work, replacing window panes and caulking windows, electrical (replacing fuses, plugs, cords, etc.), plumbing (fixing faucets, replacing washers, unclogging drains, etc.), painting (minor painting and plastering), insulation (installing weather stripping and wrapping hot water heaters), and safety devices (installing deadbolt locks, smoke detectors, etc.).
 - **Homebuyer Incentive Program (HIP):** Troy Rehabilitation and Improvement Program (TRIP) administers federal HOME funds for the city of Troy, available to income-eligible first-time homebuyers for downpayment and/or closing cost assistance in the amounts of \$15,000 & \$20,000. This program helps to promote homeownership in Troy for low-income homebuyers. Eligible applicants must have an annual household taxable income at the time of application (and purchase) under 80% of the HUD area median income.
 - **Homebuyer Orientation:** The HOME fund also supports Troy Rehabilitation and Improvement Program (TRIP)'s Homebuyer Orientation program. This program talks about the advantages and disadvantages of homeownership, qualifying for a mortgage, and costs in the homebuying process. Participants will also learn about TRIP's Pre-Purchase Program and First Time Homebuyer Downpayment Assistance.

- **Commission on Economic Opportunity (CEO) – Healthy Homes:** Through a partnership between the CEO and the City of Troy, income-eligible homeowners can take advantage of grants to make their homes safer and more comfortable while addressing problem areas such as lack of insulation, drafty windows, a leaky roof, or even problems navigating your home due to a disability. CEO's Building and Energy Services include EmPower New York, and the Weatherization Assistance Program, which are funded by the New York State Energy Research and Development Authority (NYSERDA). CEO's Weatherization Assistance program offers free insulation and air-sealing services to eligible residents in Rensselaer and Washington counties. Applicants must meet income requirements to qualify based on household sizes. For example, a one-person household should have an annual income of no more than \$31,318. A household is automatically eligible if a household member receives supplemental security income, is on the food stamp program, is HEAP eligible, or is on Public Assistance. Renters may also apply if more than half of the building's tenants meet the eligibility guidelines, and the building contains up to four units (with landlord approval).

The EmPower New York program can help lower home energy use through free electrical and appliance upgrades. An applicant may be eligible for the EmPower New York program if they currently live in or near Rensselaer County, are living in a building with 100 units or less, have high usage amounts of electricity (KWH) or gas (Therms), and either have a household income of less than 60% of the state median income (i.e., HEAP eligible) or are currently enrolled in a utility payment assistance program.

- **Affordable Housing Partnership (AHP) - Energy Efficiency and Green & Healthy Homes Initiative of the Capital Region:** AHP's Energy Efficiency program is funded through the New York State Energy Research and Development Authority (NYSERDA) and provides Comprehensive Home Energy Assessments as well as home energy improvements to income-eligible households. To qualify for the NYSEDA incentives, applicants must be income-eligible based on the County in which the property is located and household size. The Green & Healthy Homes Initiative is working to streamline programs and braid resources, allowing otherwise stalled home improvement projects to proceed. The focuses of the Initiative include Lead Hazard Reduction, Asthma Trigger Control, Fall/Injury Prevention, Energy Efficiency, Weatherization, and Rehabilitation. AHP has also been using a grant from the New York State Affordable Housing Corporation (NYSAHC) for gap funding. NYSAHC program qualification is determined by household income (should be below 80% of AMI) and applicants' assets cannot exceed \$15,000. AHP assists around 50 Rensselaer County households a year.
- **Capital Roots Tree Planting Program:** The City of Troy is partnering with Capital Roots and the Troy Street Tree Advisory Board to implement a tree-planting program. With funding from a New York State DEC Urban and Community Forestry Grant, trees will be planted free of charge for interested residents and businesses.
- **Landlord Training:** Troy Rehabilitation and Improvement Program (TRIP) offers Landlord training, which is \$20.00 for a four-hour workshop available to all landlords in the City of Troy.
- **Troy Police Department Trespass Affidavit Program:** This program is available to property owners who are having trouble with illegal activity in their building.
- **Code Enforcement Inspections:** The Bureau of Code Enforcement'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.

Approximately 10 years ago, the City embarked on a Landlord Registry for rental housing units but never proceeded to further the implementation of a Residential Occupancy Permit (ROP) program. Both the City of Albany and the City of Cohoes have an ROP program in place.

The increase in the number of absentee landlords in Troy (particularly out of town absentee owners) highlights the need for a comprehensive tracking system to monitor the conditions of existing rental housing units in the City.

- **Affordable Housing Development:**

- 1) **Troy Rehabilitation Improvement Program (TRIP)** is developing 51 new affordable housing units in eight new construction buildings on scattered sites in collaboration with Unity House. This \$2 million project will be available to people whose household incomes fall between 50 and 60% of the AML. The 51 new units include 33 1-Bedroom Units, 12 2-Bedroom Units, four 3-Bedroom Units, and two 4-Bedroom Units. 26 of these units are specifically designed to accommodate Persons with Mobility, Hearing, and/or Vision Impairment, and 26 of the units will support persons belonging to a special population and will not be part of the lottery. Units are developed following Energy Star and green standards, lead-safe practices, and healthy indoor air quality. The first building which is located at 69 Rensselaer Street will be delivered in January 2022, and the last building will be delivered in June 2022.
- 2) **The Habitat for Humanity Capital District** is currently planning four to seven new single-family home new constructions in Troy. The organization usually aims to develop eight to ten homes per year in total across several service counties. The last project in Troy was built in 2018. The new home projects in Troy are expected to deliver in 2022. The Troy Community Land Bank partnered with the City and Habitat for Humanity in the acquisition of the vacant buildings for the North Central/South Lansingburgh 5th Avenue project in the past. Habitat's homes are available to people with incomes below 80% of the AML living within Habitat's service counties. Applicants must also be willing to work with Habitat on the new home construction by providing labor. Habitat will generally hold housing lotteries too, as there are usually more applicants than homes available.
- 3) **City of Troy Industrial Development Authority (IDA)** has the mission of enhancing the City's development by promoting, encouraging, and assisting in the acquiring, constructing, reconstructing, improving, maintaining, equipping, and furnishing of sustainable industrial, manufacturing, warehouse, commercial, and research facilities to create job opportunities and to improve health and recreation opportunities, general prosperity, and economic welfare of the people of Troy. TIDA accomplishes its mission by providing financial assistance in the form of tax abatements to eligible projects consistent with Article 8, Title 11 of the Public Authorities Law of the State of New York. Since 2011, IDA has provided tax abatements to seven housing development projects that most likely have affordable housing components in Troy, totaling 597 housing units. However, the purpose of the tax abatement program is to encourage job creation in Troy, and the IDA does not monitor or measure whether the projects deliver affordable housing units upon completion.

E. LAND USE AND COMPREHENSIVE PLANNING

The City of Troy's former Comprehensive Plan was completed in 1962 and was the first planning and policy document to guide growth and development in the city. An updated comprehensive plan, the

Realize Troy Comprehensive Plan (2018) was initiated in 2014. The new Comprehensive Plan establishes a vision, and city building strategies and describes and illustrates projects that can support the long-term transformation of the city. The Plan also considers the city's land use and development potential and outlines policies and strategies to manage and direct change while understanding socio-economic trends, housing conditions and needs, cultural and environmental resources, economic development opportunities, and other areas of significance to the community.

The Plan's public engagement process includes individuals' and organizations' participation in interviews, workshops, open houses, and online surveys over a two-year period. The City also organized a City Summit, a three-day, city-wide community visioning, and brainstorming event, and many of the ideas discussed at the Summit have been carried forward into the policies of this Plan. An interactive project blog (realizetroy.com) provided additional opportunities for residents to comment on the visualizations and strategies of this Plan and to monitor and follow project activities. The development of the Plan was led by the City of Troy and the Department of State, with guidance provided by a 25-member Advisory Group representing a range of organizations and agencies in the city.

The Realize Troy Comprehensive Plan (2018) outlines six goals and objectives:

- Grow the Economy and Population
- Promote Healthy, Safe, and Green Neighborhoods
- Invest in Mobility, Accessibility and Transportation
- Preserve and Showcase the City's Parks, Open Spaces and Cultural Assets
- Plan for Sustainable infrastructure and Protect the Environment
- Support Compact Growth

For Goal 2 "Promote Healthy, Safe, and Green Neighborhoods" which is directly related to housing, proposed housing policies include:

- Encourage a diverse housing stock to meet the needs of Troy's existing and future population.
 - A variety of housing types in terms of housing form, tenure, and affordability will be promoted. Townhouses and multi-unit buildings will be encouraged in the neighborhoods.
 - An Affordable Housing Action Plan will be developed by the City and its housing partners to encourage greater affordable options within the neighborhoods with mixed-income housing close to transit, local amenities, and employment areas.
 - In the city center, nodes and along corridors, mixed-use infill housing, and residential uses on upper floors of buildings will be encouraged.
 - Low-impact development and green building practices will be incorporated for new housing development.
 - The City will continue to develop home ownership incentive programs to attract new residents and support existing residents looking to purchase a home within the city.
- Support long-term neighborhood reinvestment through rehabilitation of Troy's older and vacant housing stock.
 - The revitalization of City-owned vacant lots will be promoted within the neighborhoods through infill development and intensification. The City will consider a full range of tools to efficiently track and monitor the city's vacant housing inventory.
 - Troy will increase support of the Troy Community Land Bank in undertaking strategic rehabilitation and renewal activities.
 - The enforcement of property standards and efficient use of enforcement resources will be prioritized.
 - The City will work with property owners and developers to encourage the reuse of vacant, underutilized, and abandoned sites and buildings in the neighborhood to prevent neighborhood decline.
 - Prevent the further subdivision of residential buildings and identify incentives to restore those that have undergone subdivision back to their historic as-built use.

- Provide accessible housing options.
 - The development of assisted living facilities, supportive housing, and shared housing options for all lifecycles will be encouraged.
 - New and rehabilitated housing should aim to meet or exceed the Americans with Disabilities Act standards.
 - New homeowners will be actively targeted through incentive initiatives such as mortgage assistance and tax abatement programs.

The Plan also provides place-specific strategies to guide neighborhood renewal for:

- Lansingburgh, North Central (includes areas north of Hoosick Street, and areas east to the city line including North Hillside and Frear Park),
- Hillside (includes Beman Park, RPi, and Congress Street) and Sycaway,
- South Central (including Riverside, Washington Park, Little Italy, and the Pottery District),
- South Troy (includes Burden, Osgood, and Stowe), and
- Eastside (includes Albia and Campbell Avenue neighborhoods).

F. ZONING

Troy currently has five residential zoning districts: R-1 Single-Family Residential, Detached, R-2 Two-Family Residential, R-3 Multiple-Family Residential, Medium-Density, R-4 Urban Neighborhood Residential, Medium- to High-Density, and R-5 High-Rise Residential, High-Density. There is also a P Planned Development district that allows residential uses. Higher-density mixed-use multifamily developments are also allowed in the B-4 Central Commercial District, Waterfront Districts, and the Hoosick Street Zoning Districts.

- Single-Family Residential, Detached: This district is designed to preserve and extend existing single-family detached home neighborhoods. The intent is to provide for larger-scale urban lots, spacious living units, wide streets, and, where economically practical, sidewalks in a low-density setting. The minimum lot area is 7,200 square feet, and the maximum density is 5.5 units per acre.
- Two-Family Residential: The R-2 district is designed to maintain the integrity of existing traditional two-family unit residential neighborhoods and to encourage the construction of duplex units either as infill housing or on a larger scale at a low-to-medium density. The minimum lot area is 5,800 square feet for single-family detached homes and 3,500 square feet per unit for two-family homes. The maximum density is 7.5 units per acre for single-family homes and 12 units per acre for two-family homes.
- Multiple-Family Residential, Medium-Density: The R-3 district allows for the transition from lower-density, large-lot one- and two-family residences to medium-density, multifamily residences of various types. These regulations intend to provide for the orderly development of new low-rise apartment units and townhouses while maintaining the integrity of existing, stable neighborhoods. Additionally, limited professional and existing home occupation uses will be permitted within the scale of existing immediately adjacent neighborhoods. The minimum lot area for single-family detached homes is 5,000 square feet, 2,500 square feet per unit for two-family homes and other residential types. The maximum density is 10.5 units per acre for single-family detached homes and 21.5 units per acre for other residential types.
- Urban Neighborhood Residential, Medium- to High-Density: This district is designed to continue the stabilization and upgrading of the City's oldest and most well-established neighborhoods.

Recognizing the unique problems of mixed land use patterns and the need to accommodate traffic flow and parking within an urban street system designed prior to the widespread use of automobiles, the regulations for this Zone district are designed to maintain existing housing densities. The minimum lot area is 1,000 square feet per unit for all residences, and 4,000 square feet for neighborhood commercial developments. The maximum density is 40 units per acre.

- **High-Rise Residential, High-Density:** The R-5 district is designed to accommodate the construction of high-rise, high-density residential buildings. Within these structures, complementary professional, health-related, institutional/and commercial uses are encouraged. There is no minimum lot area for this district, and the maximum density is 60 units per acre for medium-rise uses and 120 units per acre for high-rise uses.
- **Planned Development:** This district is designed to maximize choice in the types of environments, 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 are proposed. This district intends to foster creative and efficient use of land resulting in small networks of utilities and streets, the preservation of existing natural resources, and a development pattern consistent with community needs and standards. Allowed uses include dwelling units, detached, semidetached, attached, or a combination thereof, whether single-family, duplex, multiplex, condominium, or low-rise multifamily, as well as recreational facilities expressly designed for use by occupants of the above cited dwelling units. The maximum density is six units per acre, for single-family detached homes, 14 units per acre for two-family homes, and 21.5 units per acre for other residential types.

The inclusion of higher-density residential zoning is a positive development for Troy in terms of affordable housing development. The Multiple-Family Residential, Medium-Density District, Urban Neighborhood Residential, Medium- to High-Density District, and the High-Rise Residential, High-Density District allow smaller land sizes with more units, which lowers the per-unit land costs and increases revenues from rents or sales for developers. It will also lower the site infrastructure costs (e.g., roads, water, sewer, etc.) passed along to each homebuyer or renter. Often, these higher-density residential developments occur in more urban and suburban areas that are already developed, reducing the need for site infrastructure costs. All these factors help to incentivize developers to construct affordably priced housing that meets the needs of low- and moderate-income residents in Troy. One new development related to zoning is that a public presentation of the new draft City of Troy Zoning Ordinance is proposed for January 26, 2022.

G. PROPERTY TAXES AND HOUSING AFFORDABILITY

According to the Troy's Assessor's Office, the total city property tax rate is \$22.78 per every \$1,000 assessed value for the 2021 tax year. In addition, depending on the school district that the property is located within, the school district tax rate is \$20.99 and \$ 22.549 per every \$1,000 assessed value for the Lansingburgh school district and the Troy school district, respectively, for the 2021 tax year. The property tax rates dropped noticeably after the 2013 tax year, due to the increase in property assessed value after the 2013 reevaluation. It is estimated that the next reevaluation will take place in 2023.

According to the New York State Department of Taxation and Finance, there are four major types of property tax exemptions and credit programs available in Troy based on property owners' ownership, income, age, disability, and veteran status. These include:

- Senior Citizens Exemption,

- Veterans Exemptions,
- Exemption for Persons with Disabilities, and
- Exemptions for Agricultural Properties

The programs can advance housing affordability, especially for low-income, senior, and disabled veteran homeowners.

Under the Senior Citizens Exemption, local governments and school districts in New York State can opt to grant a reduction on the amount of property taxes paid by qualifying senior citizens. The taxable assessment of the senior's home can be reduced by as much as 50%. To qualify, seniors generally must be 65 years of age or older and meet certain income limitations and other requirements. For the 50% exemption, the law allows each county, city, town, village, or school district to set the maximum income limit at any figure between \$3,000 and \$29,000. Localities have the option of giving exemptions of less than 50% to seniors whose incomes are more than \$29,000. Under this option, called the "sliding-scale option," such an owner can have a yearly income as high as \$37,399.99 and get a 5% exemption in places that are using the maximum limit.

There are three different property tax exemptions available to veterans who have served in the U. S. Armed Forces, including veterans who have served in the U.S. Army, Navy, Air Force, Marines, and Coast Guard. Veteran homeowners only receive one of the three exemptions. The Alternative Veterans Exemption is available only on residential property of a veteran who has served during a designated time of war, or who has received an expeditionary medal, and it is currently available in over 95 percent of the county, city, town, and village taxing jurisdictions across the state. The Cold War Veterans Exemption is available only on the residential property of a veteran who served during the Cold War period. The Eligible Funds Exemption provides a partial exemption, and it applies to the property that a veteran or certain other designated person purchases. Such owners must purchase the property with pension, bonus, or insurance monies.

The eligibility for the Exemption for Persons with Disabilities is based on the individual's disability, income, residency, and ownership. The basic exemption is a 50% reduction in the assessed value of the legal residence of the qualifying disabled person. For the basic exemption, the law allows each county, city, town, village, or school district to set the maximum income limit at any figure between \$3,000 and \$29,000. Localities also have the option to give exemptions of less than 50% to persons with qualifying disabilities whose incomes are more than \$29,000. Under this option, called the "sliding-scale" option, a qualifying owner can have a yearly income as high as \$37,399.99 and get a 5% exemption in places that are using the maximum limit.

To be eligible for Agricultural Building Exemptions, the structure or building must be essential to the operation of lands actively devoted to agricultural or horticultural use. The structure or building must actually be used and occupied to carry out the agricultural or horticultural operations. The farmland must be used in bona fide agricultural or horticultural production carried on for profit. The farmland must not be less than five acres in area. An application for exemption must be filed within one year of completion of construction.

H. COMMUNICATION AND OUTREACH

The City has a Citizen Participation Plan (CP) to include the public in the development of consolidated plans and action plans. The Plan encourages public participation, emphasizing involvement by low and moderate-income persons, particularly those living in areas targeted for revitalization and areas where funding is proposed. In addition, it encourages the participation of all its citizens, including minorities, non-English speaking persons, and persons with disabilities. Written materials can be provided in Spanish, and the City makes all reasonable accommodations for persons with special needs that request

assistance. Assistance was available throughout the process to all persons or groups in need. Troy conducted extensive public outreach including four public hearings, two (2) 30-day public comment periods on the 2020-2024 Five (5) year Consolidated Plan and the 2020 Annual Action Plan. The City also coordinated with local non-profits and other organizations in the implementation of its programs to ensure the greatest impact in addressing community needs.

The City held four (4) public focus groups on October 24th, October 29th, November 12th, and November 14th, 2019. Public, private, and social service organizations and community members were encouraged to attend and provide input on proposed 5-year and Annual Consolidated Plan activities through a public notice published in the local newspaper. Public input was also solicited at all focus groups. The Housing and Community Development Department also posted a 30-day public comment period in the local newspaper on March 16th and March 31st starting April 1st and ending April 30, 2020. Opportunity for public review and comment was also given through the Troy City Council available through a 30-day comment period from April 2nd to May 7th, 2020. Information is also posted on the City website in accordance with the Citizen Participation Plan. After proper public outreach and compliance with HUD citizen participation requirements, the Consolidated Plan was adopted by City Council in May 2020.

The Troy Rehabilitation and Improvement Program, Inc (TRIP) is an affiliated NeighborWorks® organization, and part of a Congressionally funded national network of premier groups supported in part by NeighborWorks America. TRIP administers the Homebuyer Incentive Program (HIP), which is funded by federal HOME funds for the City of Troy. The Home Ownership Center opened in Troy in 2001, creating a one-stop shop for homebuyers and homeowners. In addition to being a member of the national NeighborWorks® network, TRIP is a certified HUD Housing Counseling Agency. TRIP's services include:

- homebuyer education,
- financial counseling,
- down payment and closing cost grant assistance,
- matched savings programs,
- landlord training,
- home maintenance training, etc.

However, TRIP does not provide fair housing education, housing discrimination legal counseling, or mediation services. Instead, TRIP will refer those in need to other organizations such as the United Tenants of Albany, Inc., and attorneys.

I. PUBLIC TRANSPORTATION

Currently, the Capital District Transportation Authority (CDTA) provides bus services in Troy, Albany, Schenectady, and Saratoga (Map 5-4 and 5-5). There are 14 routes that connect Troy, including:

- Route 22 Albany - Troy via Watervliet (Albany/Troy via Watervliet, between Empire State Plaza, Albany and Fulton, and 4th, Troy - 7 days a week),
- Route 85 Waterford – Troy (Between Lansingburgh, South Troy via 5th Avenue and 4th Street - 7 days a week),
- Route 182 Troy-Cohoes-Latham-Albany (Troy/Albany via Cohoes/Latham, from Downtown Troy, Watervliet, Green Island, Cohoes, and Latham Farms, Latham Shoppes to Albany - 7 days a week),
- Route 224 Albany - Troy – Rensselaer (Between Downtown Albany, via Route 4 and Downtown Troy - weekdays only),

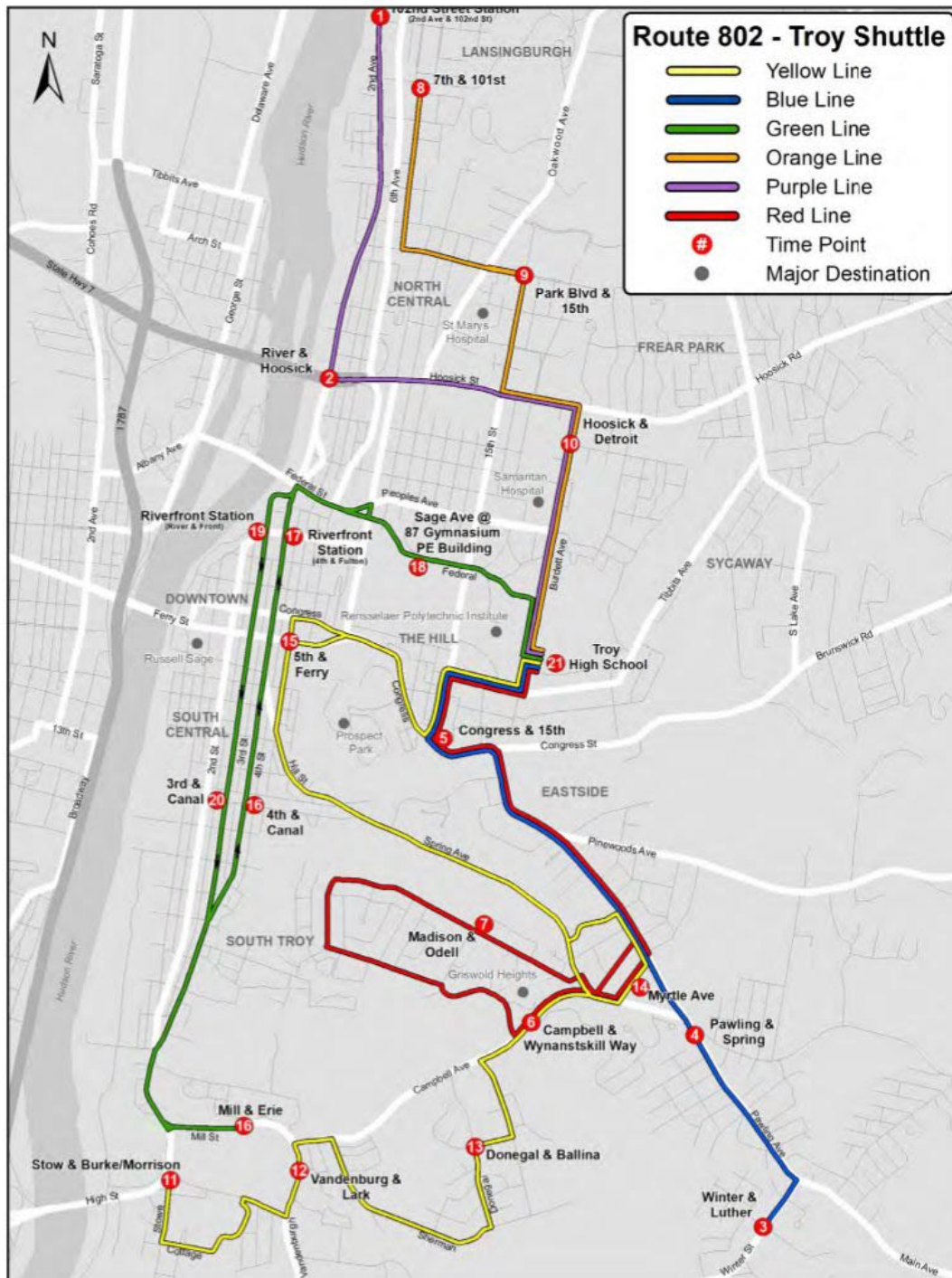
- Route 286 RPI Shuttle (Troy/Wynantskill via RPI Campus, between Downtown Troy and Wynantskill - weekdays and Saturdays),
- Route 288 RPI Uptown Shuttle (Between RPI Houston Field House, 15th St, Sage Ave, 6th Ave - weekdays only),
- Route 289 Griswold Heights (Griswold Heights, Downtown Troy, and St. Mary's Hospital - 7 days a week),
- Route 522 Hudson River Express (between Cohoes and Downtown Albany via I-787 - weekdays only),
- Route 802 Troy Shuttle - weekdays only),
- Route 808 Albany - North Greenbush Shuttle,
- Route 809 South Albany - Troy Shuttle (Stuyvesant Plaza, Downtown Albany via Rensselaer, LaSalle (school) - weekdays only),
- Route 815 Troy Shopping Bus (Troy Shopping Shuttle, between Troy to Downtown Troy and Brunswick Walmart - Wednesdays only), and
- Route 923 BusPlus Blue Line Waterford to Rail Trail Station (BusPlus+, between South Pearl Street in Albany, northern Lansingburgh, and Waterford via 2nd Ave and Broad Street - 7 days a week).

The Route 288 RPI Uptown Shuttle and the Route 815 Troy Shopping Bus are currently not in service. Route 288 RPI Uptown Shuttle, Route 289 Griswold Heights, and Route 802 Troy Shuttle operate within the City the Troy. Route 802 Troy Shuttle operates on weekdays starting from 7:55 am till 3:47 pm. Route 289 Griswold Heights operates from 6:30 am to 11:45 pm on weekdays, and from 9:00 am till 5:50 pm on weekends. All the other routes are regional services connecting Troy to nearby cities or points of interest. The regional routes operate starting as early as 5:18 am and ending by 1:00 am at the latest depending on the bus route and the day of the week.

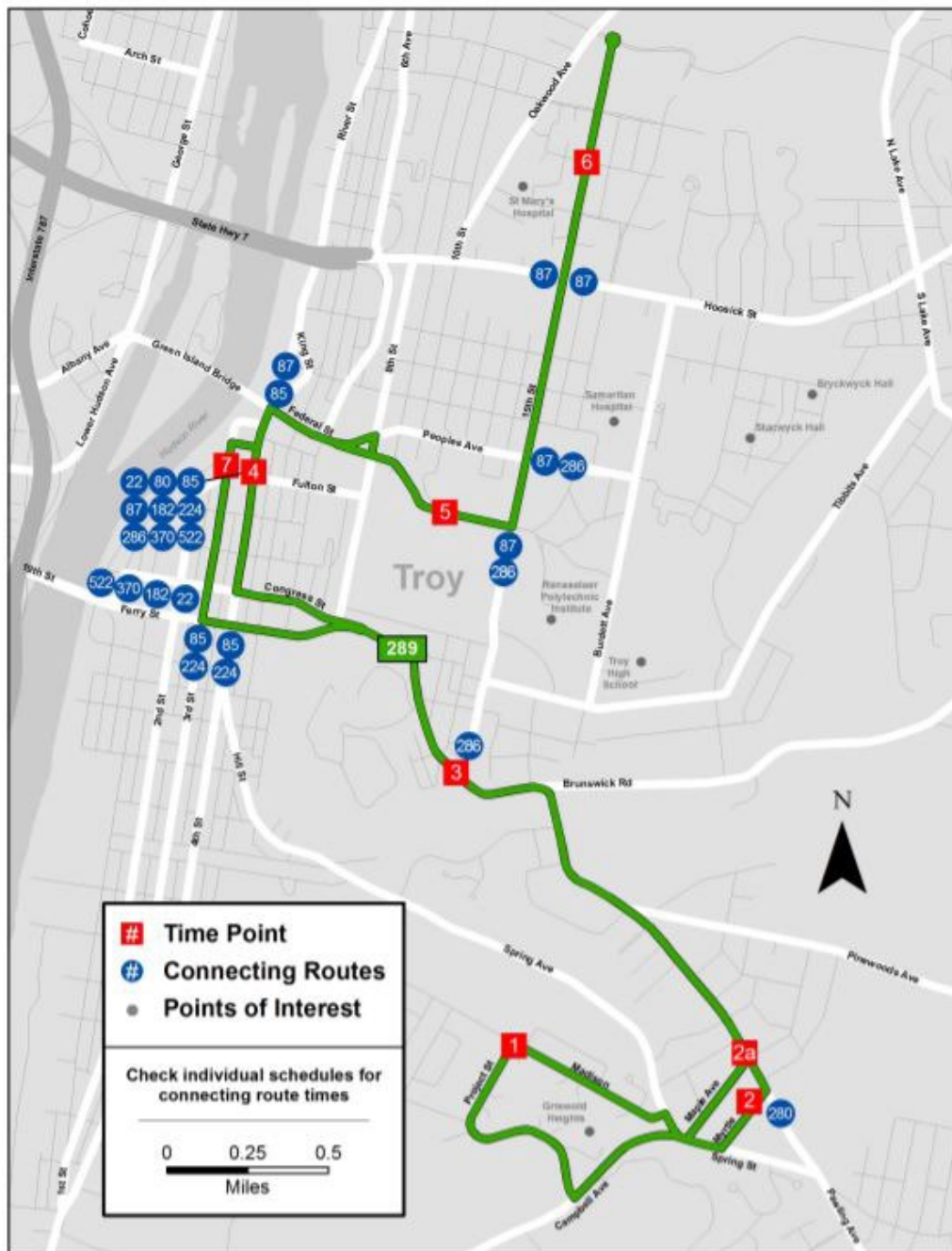
Route 923 is a newly enhanced CDTA bus route with multi-million-dollar, multi-grant improvements. It features new bus shelters, computer tracking of the route, sidewalks improvements leading to bus stops, and a faster bus route connecting the communities along the Hudson Valley with Troy. All buses on this route have bike racks and are wheelchair accessible. It is part of the BusPlus plan which was proposed in 2005 to develop bus rapid transit on the New York State Route 5 corridor, between Downtown Albany and Downtown Schenectady, supplementing CDTA's Route 55. In early 2008, CDTA announced the beginning of the project of the bus rapid transit line on New York State Route 5, which included 19 upgraded stations. In November 2020, the BRT BusPlus Service was expanded from one to three routes with Route 905 being referred to as the "Red Line" and the two new routes that operate along the New York State Route 32/Broadway corridor between Downtown Albany, Menands, and Troy/Cohoes, Route 922 and Route 923, as the "Blue Line". Route 923 is CDTA's second enhanced route in the greater Capital District.

The base fare is \$1.50, and BusPlus Fare is \$2.00. Citizens aged 65 and over, disabled individuals, Medicare cardholders, and veterans are entitled to ride for half fare at \$0.75 for Base Half Fare and \$1.00 for BusPlus Half Fare on CDTA's fixed-route service. A valid Half Fare Navigator card is required when paying half fare on the bus. Children 46" and under can ride free when accompanied by a fare-paying adult. All buses have bike racks and are wheelchair accessible. Fare rates are also discounted for Navigator Smart Card and Mobile App users.

Map 5-4: Capital District Transportation Authority Route 802 Troy Shuttle



Map 5-5: Capital District Transportation Authority Route 289 Griswold Heights



6 REVIEW OF PRIVATE SECTOR PRACTICES

A. MORTGAGE APPLICATION TRENDS

RKG Associates reviewed the practices associated with access to rental housing options and home mortgage lending as part of an assessment of housing market conditions and identifying potential impediments to fair housing choices. The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. Access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, or any other statutorily protected basis.

An analysis of the mortgage applications and their outcomes can help the City to identify possible discriminatory lending practices and patterns in a community. The Home Mortgage Disclosure Act (HMDA) was originally enacted by Congress in 1975 and is implemented by Regulation C. It requires many financial institutions to maintain, report, and publicly disclose loan-level information about residential mortgages. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete and tracked by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The latest HMDA data available for the City of Troy is from 2020. This study has included three years of data from 2018 to 2020 for all types of applications received by lenders. This includes applications for all loan purposes (home purchase loans, home improvement loans, and refinancing loans) for all property types (i.e., site-built single-family homes with one to four units, site-built multi-family structures with 5 or more units, and manufactured housing units) in Troy. Table 6-1 summarizes all the Troy applications between 2018 and 2020 by result, loan purpose, loan type, property type, and applicant race/ethnicity.

1. Loan Application Demand

Among the total of 3,644 mortgage applications documented between 2018 and 2020, 2,131 (58.5%) were applications approved and originated by the lender. Almost half (49.4%) of the applications were for home purchase loans, followed by home refinancing (32.0%) and home improvement loans (11.2%). If excluding loans for other purposes and non-applicable data, home purchase loan applications had the highest origination rate at 69.2% among all loan purposes, followed by refinancing loans at 50.6%, while home improvement loans had the lowest origination rate at 43.9%. In addition, 42.9% of the home improvement loans were denied, which was the highest percentage among the three major purposes, while home purchase loans had the lowest denial rate of 9.2%. Refinancing loan applications were more likely to be withdrawn or incomplete, at a rate of 23.2%, followed by the home purchase loan applications with a rate of 17.2%. A small portion (3.2% to 4.9%) of all the applications were approved but not accepted.

The most common type of application was for conventional loans, accounting for 80.0% of all loan types. Conventional loans were the most likely to be denied compared to the rest, with a denial rate

of 20.1%, and it also had the lowest origination rate of 58.2%. The second most common type of application was for loans insured by the Federal Housing Administration (FHA) (17.2% among all types), which had the lowest denial rates at 14.7% and the highest origination rate at 59.5%. Applications for loans backed by the Department of Veteran Affairs (VA) were the third most common, constituting 2.8% of all applications, but they had the second most successful origination at a rate of 59.2%, and the second lowest denial rate at 15.5%. There was no application for loans backed by the Farm Services Administration or Rural Housing Service (FSA/RHS) between 2018 and 2020 in Troy.

The vast majority (97.9%) of the applications were for site-built single-family homes with one to four units with an origination rate of 58.1%. There were only 74 applications (2.0%) for site-built multi-family units with five or more units in structure, but they had the most successful origination rate at 81.1%. Applications for manufactured housing units were the least common (3 applications) and the least successful, with all of them being either approved but not accepted or withdrawn/incomplete (Table 6-1).

Table 6-1
Cumulative Mortgage Application Summary, 2018-2020
City of Troy, New York

	All Mortgage Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Count	Percent	Count	Percent	Count	Percent	Count	Percent	Count	Percent
Loan Purpose										
Home Purchase	1,801	49.4%	1,246	69.2%	80	4.4%	165	9.2%	310	17.2%
Home Improvement	408	11.2%	179	43.9%	13	3.2%	175	42.9%	41	10.0%
Refinancing	1,167	32.0%	590	50.6%	54	4.6%	252	21.6%	271	23.2%
Other/Not Applicable	268	7.4%	116	43.3%	13	4.9%	101	37.7%	38	14.2%
Total	3,644	100.0%	2,131	58.5%	160	4.4%	693	19.0%	660	18.1%
Loan Type										
Conventional	2,914	80.0%	1,697	58.2%	138	4.7%	585	20.1%	494	17.0%
FHA	627	17.2%	373	59.5%	20	3.2%	92	14.7%	142	22.6%
VA	103	2.8%	61	59.2%	2	1.9%	16	15.5%	24	23.3%
FSA/RHA	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3,644	100.0%	2,131	58.5%	160	4.4%	693	19.0%	660	18.1%
Property Type										
Single Family (1-4 Units): Site-Built	3,567	97.9%	2,071	58.1%	157	4.4%	685	19.2%	654	18.3%
Multifamily Unit (5+ Units): Site-Built	74	2.0%	60	81.1%	1	1.4%	8	10.8%	5	6.8%
Manufactured Housing Unit	3	0.1%	0	0.0%	2	66.7%	0	0.0%	1	33.3%
Total	3,644	100.0%	2,131	58.5%	160	4.4%	693	19.0%	660	18.1%
Applicant Race/Ethnicity										
White	2,474	67.9%	1,456	58.9%	123	5.0%	458	18.5%	437	17.7%
Black	319	8.8%	164	51.4%	12	3.8%	80	25.1%	63	19.7%
American Indian/Alaska Native	9	0.2%	7	77.8%	0	0.0%	1	11.1%	1	11.1%
Asian	87	2.4%	45	51.7%	1	1.1%	23	26.4%	18	20.7%
Native Hawaiian/Other Pacific Islander	10	0.3%	3	30.0%	1	10.0%	2	20.0%	4	40.0%
Two or More Races	7	0.2%	2	28.6%	1	14.3%	3	42.9%	1	14.3%
Some Other Race	36	1.0%	20	55.6%	1	2.8%	7	19.4%	8	22.2%
No Data/Not Applicable	702	19.3%	434	61.8%	21	3.0%	119	17.0%	128	18.2%
Hispanic or Latino*	183	5.0%	80	43.7%	9	4.9%	55	30.1%	39	21.3%
Total	3,644	100.0%	2,131	58.5%	160	4.4%	693	19.0%	660	18.1%

* Not counted towards the totals

Source: HMDA data and RKG Associates, Inc., 2021

2. Mortgage Lending Trends by Race/Ethnicity

The racial and ethnic distribution of loan applications between 2018 and 2020 does not align with the 2019 racial and ethnic composition of the population in Troy. While 68.1% of Troy's 2019 population is White, 84.1% of all the applicants between 2018 and 2020 were White if excluding records with no race information. People of All Other Races (including Two or More Races and Some Other Race), the Black population, and the Hispanic population were underrepresented in the mortgage applications between 2018 and 2020, with only 1.2%, 8.8%, and 5.0%, respectively. In comparison, 9.5% of Troy's 2019 population were of All Other Race, 17.5% were Black and 9.6% were Hispanic.

The numbers of applications declined for home purchase loans (by 1.5%) and for Native Hawaiian /Other Pacific Islander applicants (by 60.0%) between 2018 and 2020 but increased for all other loan purposes and all other racial/ethnic groups during the same period. In particular, refinancing loan applications rose by 48.8% and applicants of Two or More Races and American Indian/Alaska Native applicants increased the fastest by 300% and 100%, respectively. Applicants of Some Other Race increased the third fastest at a rate of 46.2%. The total applications in 2020 increased by 9.6% compared to 2018 (Table 6-2).

Table 6-2
Loan Application Type by Applicant Race/Ethnicity, 2018-2020
City of Troy, New York

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic/ Latino*	No Data/Not Applicable
2018										
Home Purchase	619	396	67	0	18	2	1	6	29	129
Home Improvement	118	84	15	0	3	0	0	2	14	14
Refinancing	328	243	16	1	5	1	0	2	10	60
Other/Not Applicable	110	90	6	1	1	2	0	3	4	7
Total	1,175	813	104	2	27	5	1	13	57	210
2019										
Home Purchase	572	368	62	1	21	2	1	0	27	117
Home Improvement	156	120	15	1	0	0	0	1	7	19
Refinancing	351	244	13	0	5	1	1	3	16	84
Other/Not Applicable	102	80	8	1	4	0	0	0	7	9
Total	1,181	812	98	3	30	3	2	4	57	229
2020										
Home Purchase	610	374	73	0	18	0	1	9	41	135
Home Improvement	134	97	9	1	4	1	1	2	12	19
Refinancing	488	332	33	3	5	1	1	8	13	105
Other/Not Applicable	56	46	2	0	3	0	1	0	3	4
Total	1,288	849	117	4	30	2	4	19	69	263
Total 2018-2020										
Home Purchase	1,801	1,138	202	1	57	4	3	15	97	381
	49.42%	63.19%	11.22%	0.06%	3.16%	0.22%	0.17%	0.83%	5.39%	21.15%
Home Improvement	408	301	39	2	7	1	1	5	33	52
	11.20%	73.77%	9.56%	0.49%	1.72%	0.25%	0.25%	1.23%	8.09%	12.75%
Refinancing	1,167	819	62	4	15	3	2	13	39	249
	32.03%	70.18%	5.31%	0.34%	1.29%	0.26%	0.17%	1.11%	3.34%	21.34%
Other/Not Applicable	268	216	16	2	8	2	1	3	14	20
	7.35%	80.60%	5.97%	0.75%	2.99%	0.75%	0.37%	1.12%	5.22%	7.46%
Total	3,644	2,474	319	9	87	10	7	36	183	702
	100.0%	67.89%	8.75%	0.25%	2.39%	0.27%	0.19%	0.99%	5.02%	19.26%
Change 2018-2020										
Home Purchase	-1.5%	-5.6%	9.0%	0.0%	0.0%	-100.0%	0.0%	50.0%	41.4%	4.7%
Home Improvement	13.6%	15.5%	-40.0%	0.0%	33.3%	0.0%	0.0%	0.0%	-14.3%	35.7%
Refinancing	48.8%	36.6%	106.3%	200.0%	0.0%	0.0%	0.0%	300.0%	30.0%	75.0%
Other/Not Applicable	-49.1%	-48.9%	-66.7%	-100.0%	200.0%	-100.0%	0.0%	-100.0%	-25.0%	-42.9%
Total	9.6%	4.4%	12.5%	100.0%	11.1%	-60.0%	300.0%	46.2%	21.1%	25.2%

* Not counted towards the totals.

Source: HMDA data and RKG Associates, Inc., 2021

B. GEOGRAPHIC DISTRIBUTION OF MORTGAGE APPLICATION APPROVAL

The geographic analysis of Troy's mortgage activities was conducted to examine the mortgage application success differences by census tract, allowing the consultant and readers to identify neighborhoods that likely experienced redlining in the mortgage application and approval process.

The cumulative mortgage approval rate between 2018 and 2020 across the 14 census tracts in the City range from 47.4% (Census Tract 405) to 67.4% (Census Tracts 414). Census Tract 411 has seen the most active loan applications (510 applications) during the three years, followed by Census Tract

412 at 410 applications. This is not surprising as these two more sought-after census tracts are on the southeast side of the City, overlapping with wealthier communities with more access to better housing and employment opportunities. The census tract with the least applications between 2018 and 2020 is Census Tract 406, with a total of 98 applications, followed by Census Tract 404 with 102 total applications, which is adjacent to the downtown area. Census Tract 404 is also located to the west of The Uncle Sam Bikeway, overlapping with neighborhoods with more housing and economic challenges as well as a concentration of the non-White and the Hispanic population as discussed in previous sections (Table 6-3).

However, the mortgage approval rate depends on both the number of applications and the number of approved cases in a certain

neighborhood, which are associated with numerous other factors, including applicants' preference for a certain neighborhood, and the demographic and economic status of the applicants. Therefore, no single factor can explain why mortgage approval rates are higher in some neighborhoods than in others. To quantify how successful mortgage applicants were in pursuing mortgage financing in each neighborhood compared to the rest of the City between 2018 and 2020, RKG developed a special matrix, and this analysis is detailed below in Part D Housing Demand and Access Index Analysis.

Table 6-3
Mortgage Application Approval, 2018-2020
City of Troy, New York (Census Tracts)

	Total Application	Total Approval	Approval Rate
401	321	177	55.14%
402	359	191	53.20%
403	235	134	57.02%
404	102	51	50.00%
405	135	64	47.41%
406	98	49	50.00%
407	181	116	64.09%
408	115	65	56.52%
409	259	146	56.37%
410	247	131	53.04%
411	510	322	63.14%
412	410	253	61.71%
413	304	184	60.53%
414	368	248	67.39%

Source: HMDA data and RKG Associates, Inc., 2021

C. MORTGAGE APPLICATION DENIALS

Between 2018 and 2020, a total of 693 mortgage applications were denied, with a cumulative denial rate of 19.0%. HMDA data has provided detailed information for these 693 denials categorized by the primary reasons for the denial and by applicant race/ethnicity. The most common reason for denial is unqualified debt-to-income ratios, accounting for 32.0%, followed by credit history issues, constituting 22.2%, and collateral issues (21.8%). This pattern differs among the applicants by racial and ethnic groups. Applications from the American Indian/Alaska Native (100%) and the White (33.4%) applicants were proportionally much more likely to be denied for debt-to-income ratio reasons. Applicants of Two or More Races, Black applicants, and White applicants were also proportionally more likely to have their applications denied for credit history issues than average, with their respective denial rates for this reason at 33.3%, 27.5%, and 24.2%. In addition, except for the White, Black, and Native Hawaiian /Other Pacific Islander applicants, applicants of all other non-White minority groups were also proportionally more likely to have their applications denied for collateral reasons than the average (Table 6-4).

Table 6-4

Primary Reason for Mortgage Application Denial by Race/Ethnicity, 2018-2020
City of Troy, New York

	Total	White	Black	American Indian /Alaska Native	Asian	Native Hawaiian /Other Pacific Islander	Two or More Races	Some Other Race	Hispanic or Latino*	No Data/Not Applicable
Debt-to-Income Ratio	222	153	24	0	7	2	0	2	13	34
Employment History	13	5	2	0	2	0	0	0	1	4
Credit History	154	111	22	0	3	0	1	1	11	16
Collateral	151	92	11	1	7	0	1	3	13	36
Insufficient Cash (Downpayment, Closing Costs)	18	10	1	0	0	0	0	0	3	7
Unverifiable Information	12	6	1	0	1	0	0	1	0	3
Credit Application Incomplete	56	39	5	0	2	0	0	0	3	10
Mortgage Insurance Denied	0	0	0	0	0	0	0	0	0	0
Other	67	42	14	0	1	0	1	0	11	9
Total	693	458	80	1	23	2	3	7	55	119
Percent										
Debt-to-Income Ratio	32.0%	33.4%	30.0%	0.0%	30.4%	100.0%	0.0%	28.6%	23.6%	28.6%
Employment History	1.9%	1.1%	2.5%	0.0%	8.7%	0.0%	0.0%	0.0%	1.8%	3.4%
Credit History	22.2%	24.2%	27.5%	0.0%	13.0%	0.0%	33.3%	14.3%	20.0%	13.4%
Collateral	21.8%	20.1%	13.8%	100.0%	30.4%	0.0%	33.3%	42.9%	23.6%	30.3%
Insufficient Cash (Downpayment, Closing Costs)	2.6%	2.2%	1.3%	0.0%	0.0%	0.0%	0.0%	0.0%	5.5%	5.9%
Unverifiable Information	1.7%	1.3%	1.3%	0.0%	4.3%	0.0%	0.0%	14.3%	0.0%	2.5%
Credit Application Incomplete	8.1%	8.5%	6.3%	0.0%	8.7%	0.0%	0.0%	0.0%	5.5%	8.4%
Mortgage Insurance Denied	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other	9.7%	9.2%	17.5%	0.0%	4.3%	0.0%	33.3%	0.0%	20.0%	7.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

* Not counted towards the totals

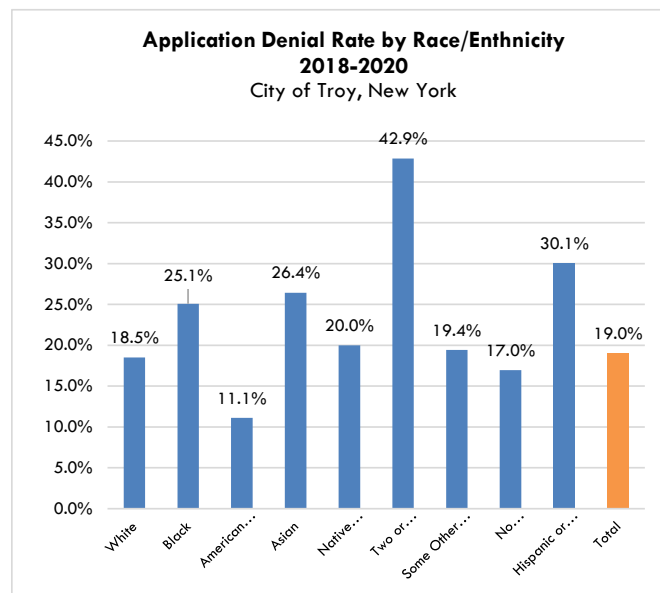
Source: HMDA data and RKG Associates, Inc., 2021

While the cumulative mortgage application denial rate is 19.0%, there is a disparity in denial rates across the racial and ethnic groups of applicants. Applicants of Two or More Races have seen the highest denial rate at 42.9% across all racial and ethnic groups, followed by the Hispanic, Asian, and Black applicants, with their denial rates ranging between 25% and 31%. American Indian/Alaska Native applicants (excluding no data) have seen the lowest denial rate at 11.1%, followed by the White applicants at 18.5% (Figure 6-1).

D. MORTGAGE DEMAND AND ACCESS INDEX ANALYSIS

RKG Associates prepared a special analysis of housing demand and access that examined how each racial or ethnic group performed on mortgage loan applications within each census tract between 2018 and 2020. The purpose of the analysis was to identify patterns of performance differences within each group as compared to how the group performed on average across all census tracts over the three years. "Mortgage Demand and Access Index" is a statistical measure created by RKG Associates to measure and compare the relative success rate of mortgage loan applications for each racial and ethnic group based on: (1) the group's ability to pay or purchase a home, (2) the proportion of the applicants by

Figure 6-1



Source: HMDA Data and RKG Associates, Inc., 2021

racial and ethnic group to the total population of loan applicants, (3) the loan denial rate by racial and ethnic group, and (4) the propensity of each racial and ethnic group to buy or rent within the 14 census tracts in Troy based on known housing tenure rates.

1. Home Purchase Loan Application Activity

Among the 1,420 home purchase loan applications with documented race and ethnic information of applicants (excluding records with no racial/ethnic data), 80.1% of them were submitted by White applicants, accounting for most applicants for home purchase loans, followed by Black applications, with a percentage of 14.2%. 6.8% of applications were submitted by Hispanic applicants, followed by Asian applicants, making up 4.0% of the home purchase loan applicants. Applicants in other racial and ethnic groups constitute between 0.1% and 1.1% of all home purchase loan applicants with documented race and ethnic information (Table 6-5).

Table 6-5

Home Purchase Loan Application by Race/Ethnicity, 2018-2020 City of Troy, New York

Applicant Race/Ethnicity	Number	Percent
Total	1,420	100.00%
White	1,138	80.14%
Black	202	14.23%
American Indian /Alaska Native	1	0.07%
Asian	57	4.01%
Native Hawaiian/Other Pacific Islander	4	0.28%
Two or More Races	3	0.21%
Some Other Race	15	1.06%
Hispanic/ Latino*	97	6.83%

Note: Excluding "No Data/Not Applicable" Under Applicant Race/Ethnicity

* Not counted towards the totals.

Source: HMDA data and RKG Associates, Inc., 2021

2. Ability-to-Pay Index

The first factor of the Housing Demand and Access Index is the "Ability-to-Pay" Index by race and ethnicity, which is the proportion of a racial/ethnic group's median household income on the City level compared to the citywide median of \$45,728, based on 2019 American Community Survey (ACS) estimates.

An applicant's ability to successfully obtain mortgage financing depends on several factors but is mostly dependent on the applicants' ability to pay for mortgage expenses (i.e., principal, interest, taxes, and insurance). Households with higher incomes will often have more options and access to greater housing choices and mortgage loans.

The Ability-to-Pay Indices that are above 1.0 represent higher household incomes than the City median and those below 1.0 represent income levels lower than the City median. Note that

the 2019 median household income for the Native Hawaiian/Other Pacific Islander population in Troy is not available according to the American Community Survey 2015-2019 5-Year Estimates. Only the White population had an index value higher than 1.0 (Table 6-6).

Table 6-6

Ability-to-Pay Index by Race/Ethnicity, 2019 City of Troy, New York

Race/Ethnicity	Median HH Income	Index
Total Racial and Ethnic Groups (City-Wide)	\$45,728	1.00
White	\$49,661	1.08
Black	\$33,176	0.62
American Indian/Alaska Native	\$30,104	0.48
Asian	\$44,803	0.98
Native Hawaiian/Other Pacific Islander	-	0.00
Two or More Races	\$29,449	0.45
Some Other Race	\$36,761	0.76
Hispanic or Latino	\$32,287	0.58

Source: ACS 2019 Estimates and RKG Associates, Inc., 2021

3. Mortgage Demand Index

The “Mortgage Demand Index” is the proportion of the number of home purchase loan applications submitted between 2018 and 2020 by each racial and ethnic group as a percentage of each group’s share of the current household population within each census tract. For example, if the percentage of the Hispanic or Latino household population in Census Tract 401 is 7.6%, and the number of home mortgage applications from this group accounted for 8.3% of the total submitted, then the Mortgage Demand Index is 1.1 ($8.3\% \div 7.6\% = 1.1$) in this census tract for the Hispanic or Latino population. This index value accounts for the fact that many people tend to gravitate to various neighborhoods that they prefer or where other people in their social network, racial and ethnic groups already live. In some respects, people naturally self-select their neighborhoods based on these and many other factors – real and perceived.

4. Mortgage Success Index

The “Mortgage Success Index” measures the relative net success rate of home purchase loan mortgage originations to mortgage denials by race/ethnicity. For example, in Census Tract 401, there were 91 mortgage loan applications either approved or denied with a total of 9 denials resulting in a net of 82 mortgage loans approved and originated, at a net success rate of 90%. For the Asian applicants, there were two mortgage applications either approved or denied and there was no denial, so their net success rate was 100% in this census tract. Therefore, their Mortgage Success index was 1.11 ($100\% \div 90\% = 1.11$).

5. Results of Mortgage Demand and Access Index

Once the three key indices were calculated for each census tract, an overall “Mortgage Demand and Access Index” was calculated, and the results were mapped to examine where in the City racial and ethnic groups may be having difficulty accessing mortgage financing for home purchases. This analysis does not account for access issues related to rental housing and is not considered a definitive indicator of different peoples’ ability to access mortgage loans. No single factor can explain why a given group of households was successful or unsuccessful in obtaining mortgage financing in any part of the City, but this analysis examines some of the most likely factors.

To obtain a final score for each group in each census tract, RKG weighted each index score to reflect its relative importance to each group’s ability to obtain mortgage financing for home purchases. The Ability-to-Pay Index received the highest weighting factor at 50% of the final score since it is the strongest determinant of success in pursuing a mortgage loan. Income is also correlated with a household’s credit score, which is another important factor leading to a favorable credit decision.

Net Mortgage Success Index was assigned a weighting factor of 35% and Mortgage Demand Index was assigned a weighting factor of 15% so that variations between the demand and success among the various race and ethnic groups can be identified. Net mortgage success is a function of a lot of factors but is mostly related to a group’s ability to successfully obtain a mortgage loan to purchase a home. While some of those factors are related to a group’s ability to pay, credit scores, and similar factors, excessive loan denial rates could denote something else. Conversely, a group’s success rate at obtaining mortgage financing in Troy’s neighborhoods can only be judged by the demand exhibited by each group to live in these neighborhoods. If Hispanic households do not pursue mortgages to buy homes in a given census tract, it is difficult to judge why that has occurred. But if Hispanic households pursue mortgage loans in certain neighborhoods but are denied at rates exceeding their citywide denial rates, this may indicate that barriers exist.

Index values shown on the maps represent a racial or ethnic group's index value for each census tract compared to this group's citywide average. The values shown in Table 6-7 reflect the average index value for census tracts citywide by racial/ethnic group. The darker-colored census tracts with values greater than 1.0 indicate that the racial or ethnic group performed better in those census tracts. The opposite is true for lighter shaded tracts. Some groups did not perform well in some census tracts because they did not seek mortgage applications for homes in those census tracts. Those are internal decisions that applicants make based on unknown factors, but they could be related to home sales prices, crime rates, perceptions of school quality, the quality of homes, or even the racial composition of the neighborhood.

Table 6-7
Housing Demand and Access Index, City-Wide Average
City of Troy, New York

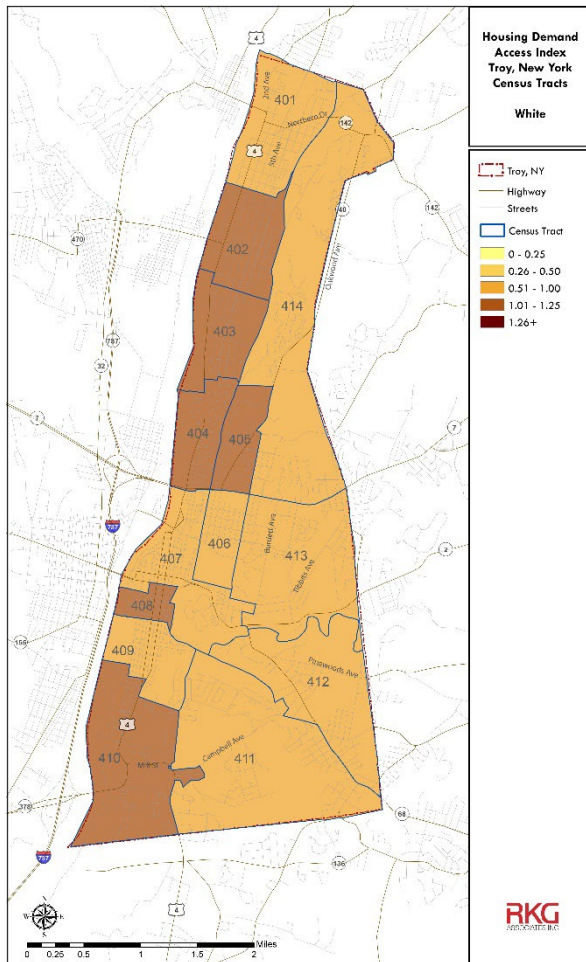
	Average
Total Racial and Ethnic Groups	1.00
White	1.13
Black	1.03
American Indian/Alaska Native	0.27
Asian	1.06
Native Hawaiian/Other Pacific Islander	0.00
Two or More Races	0.31
Some Other Race	0.58
Hispanic or Latino	0.80

Source: RKG Associates, Inc., 2021

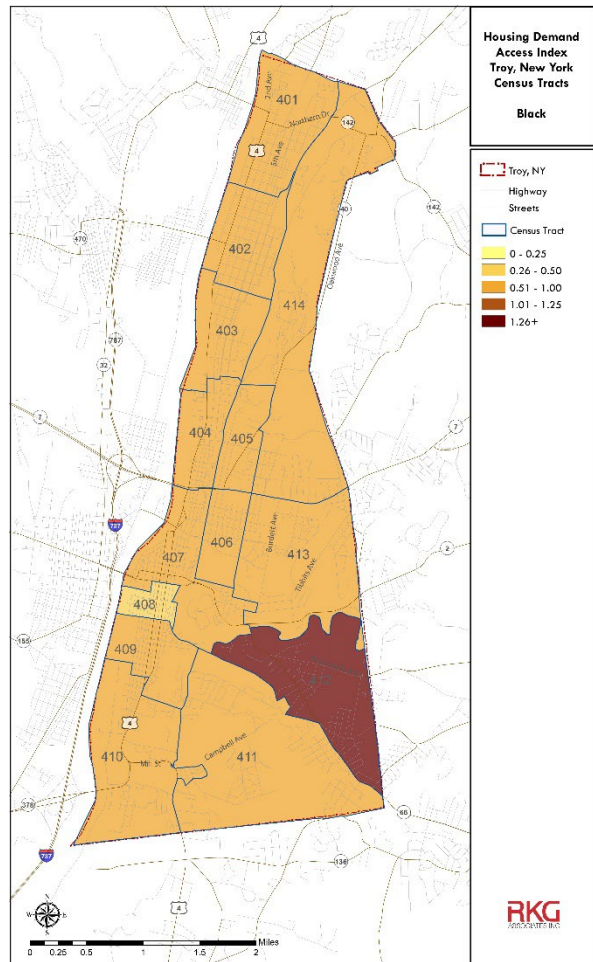
Note that the Native Hawaiian/Other Pacific Islander population has a citywide Demand and Access Index of zero as this group's 2019 median household income is not available and as there was no Native Hawaiian/Other Pacific Islander living in households in Troy in 2019 according to ACS. However, there were four total home purchase loan mortgage applications submitted by Native Hawaiian/Other Pacific Islander applicants between 2018 and 2020 in Troy for Census Tracts 402, 403, and 414, and two of them were approved and originated (for Census Tracts 402 and 414). Situations like this where a racial/ethnic group had successful home purchase loan mortgage originations between 2018 and 2020 for a census tract where this group did not previously live (zero household population according to 2019 ACS) are categorized as "New Entry".

Only the White population (1.13), Asian population (1.06), and the Black population (1.03) have Demand and Access Index scores above the citywide average. The remaining racial and ethnic groups all have Demand and Access Index scores below the citywide average. In particular, except for the Native Hawaiian/Other Pacific Islander population, which was discussed above, the American Indian/Alaska Native people have the lowest Demand and Access Index score at 0.27, followed by people of Two or More Races (0.31) and people of Some Other Race (0.58). This indicates that these minority/ethnic groups have less success in obtaining mortgage financing for home purchases compared to the White, Asian, and the Black population in Troy according to the Demand and Access Index. However, again, this index does not measure all the numerous factors that influence a racial/ethnic group's success in securing home mortgage loans.

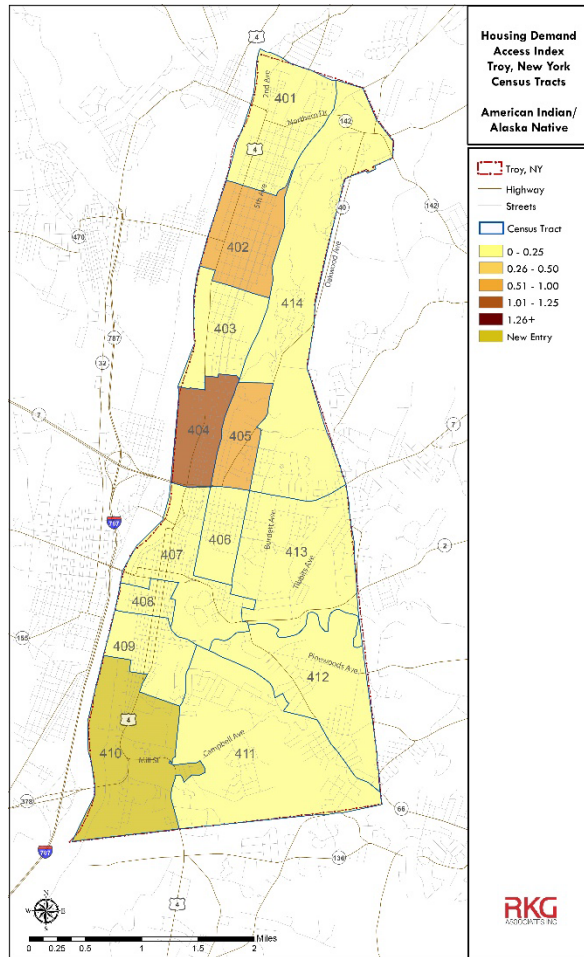
**Map 6-1: Mortgage Demand & Access Index
(White)**



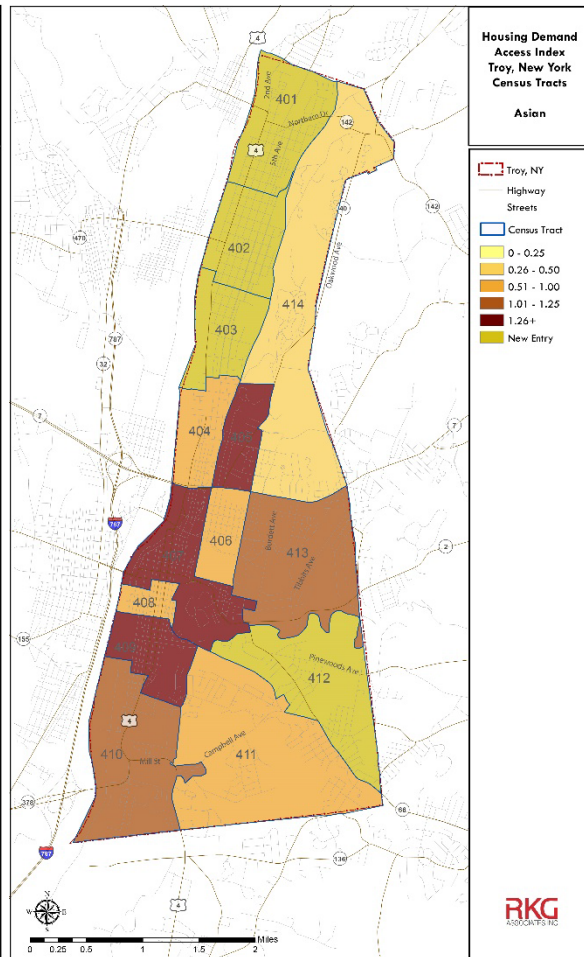
**Map 6-2: Mortgage Demand & Access Index
(Black)**



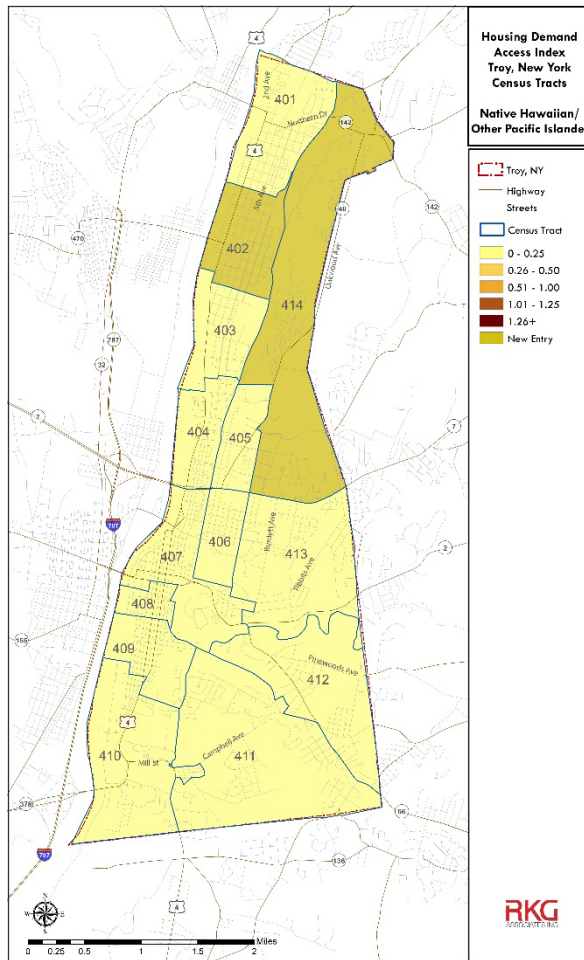
**Map 6-3: Mortgage Demand & Access Index
(American Indian/Alaska Native)**



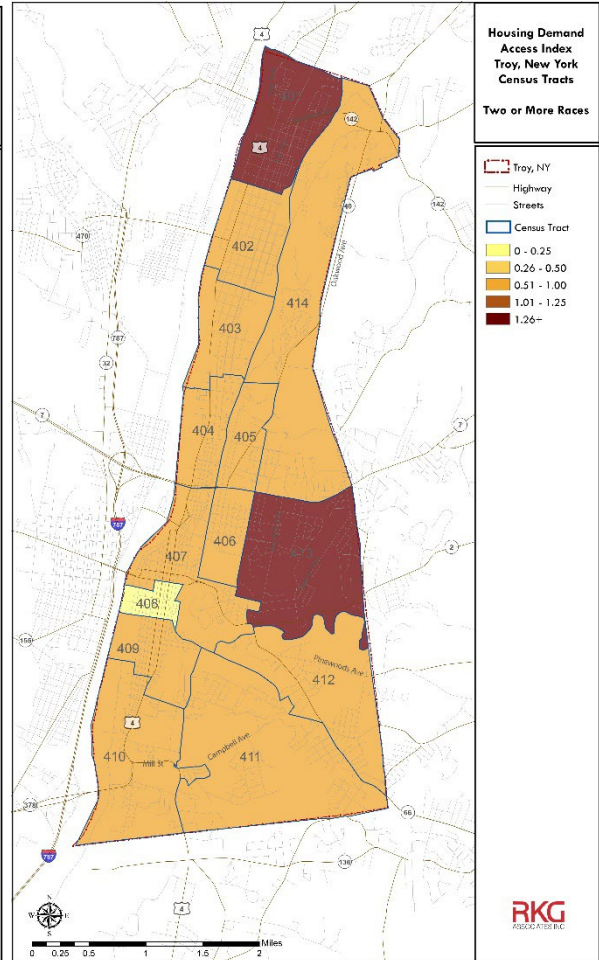
**Map 6-4: Mortgage Demand & Access Index
(Asian)**



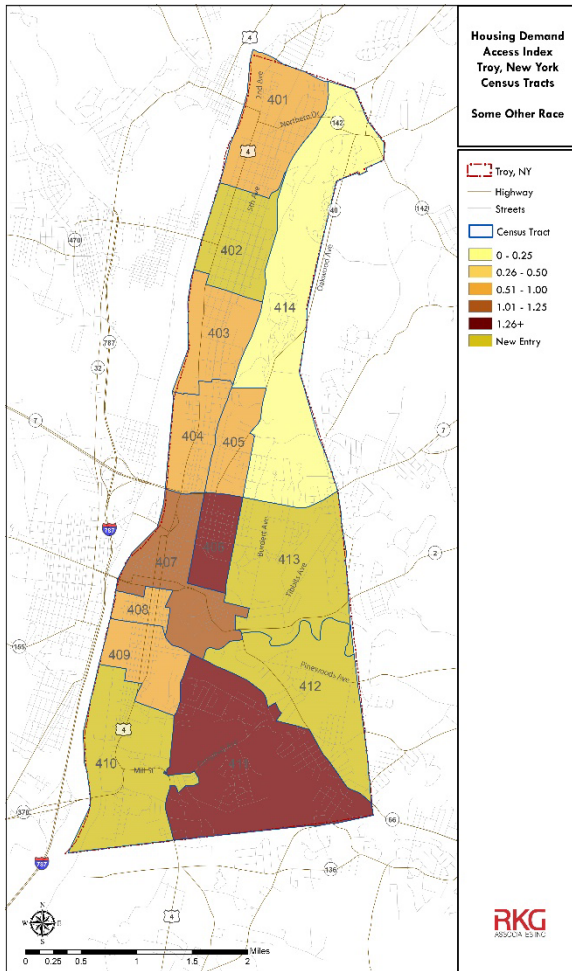
**Map 6-5: Mortgage Demand & Access Index
(Native Hawaiian/Other Pacific Islander)**



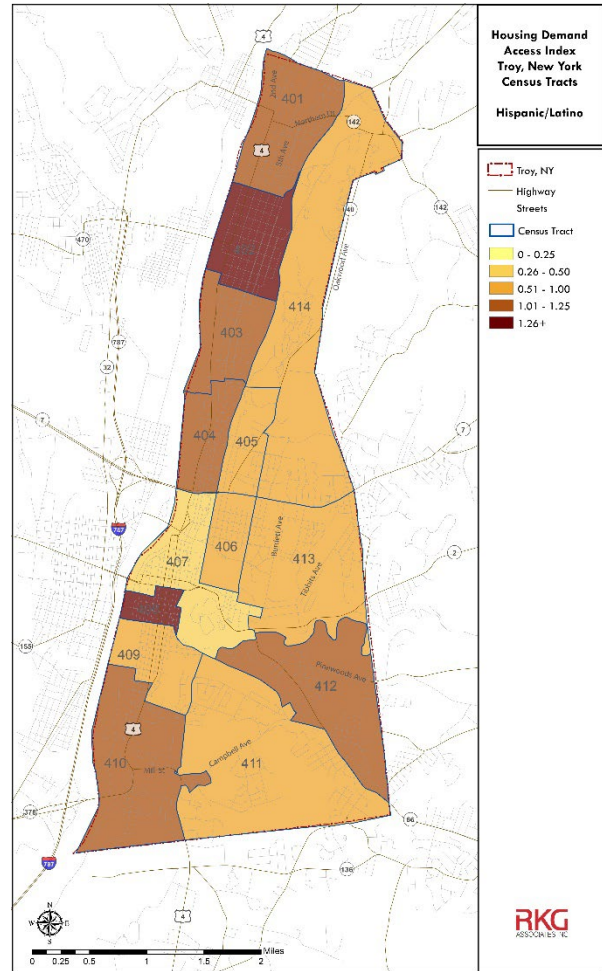
**Map 6-6: Mortgage Demand & Access Index
(Two or More Races)**



**Map 6-7: Mortgage Demand & Access Index
(Some Other Race)**



**Map 6-8: Mortgage Demand & Access Index
(Hispanic/Latino)**



E. HIGH-COST LENDING

A subprime mortgage is a type of home loan issued to borrowers with low credit scores (often below 600) who are unqualified for conventional mortgages. Subprime mortgages usually come with much higher interest rates and down payments than conventional options because the borrowers often are at higher default risks. However, more expensive subprime loans are sometimes issued to some borrowers with high enough household incomes, credit scores, and available down payments to qualify for conventional loans. Historically, this is especially true for minority groups, which usually see higher percentages of subprime borrowers. The decision and practice of subprime lending targeting borrowers' racial or ethnic status constitute mortgage discrimination.

Since 2005, Housing Mortgage Disclosure Act data has included a new category of information called "rate spread." It represents the difference between the loan interest rate and the prevailing U.S. Treasury standard. Though HMDA does not require lenders to report credit score data of applicants which can be used to determine which loans are subprime, the "rate spread" data can help identify "high-cost" loans, which is a strong predictor of subprime lending and possible mortgage discrimination.

A loan is considered a high-cost loan if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate of at least five percentage points higher than the standard.

Table 6-8 shows the total cases of high-cost lending by borrowers' racial or ethnic groups between 2018 and 2020 in Troy. The citywide average high-cost lending rate for all racial/ethnic groups is 0.96%, which is calculated by comparing the number of high-cost lending cases to the total amount of originated and approved not accepted applications. The high-cost lending rate for each racial and ethnic group is generally low, between 0% and 3%. However, Hispanic/Latino borrowers were more likely to experience high-cost lending during the three years compared to other groups, with the

Table 6-8

Cumulative High Cost Lendings by Race/Ethnicity, 2018-2020 City of Troy, New York

	No. of High Cost Lendings	Total Originated/ Approved Not Accepted Applications	High Cost Lending Rate
White	16	1,579	1.01%
Black	2	176	1.14%
American Indian/Alaska Native	0	7	0.00%
Asian	1	46	2.17%
Native Hawaiian/Other Pacific Islander	0	4	0.00%
Two or More Races	0	3	0.00%
Some Other Race	0	21	0.00%
No Data/Not Applicable	3	455	0.66%
Hispanic or Latino*	2	89	2.25%
Total	22	2,291	0.96%

* Not counted towards the totals

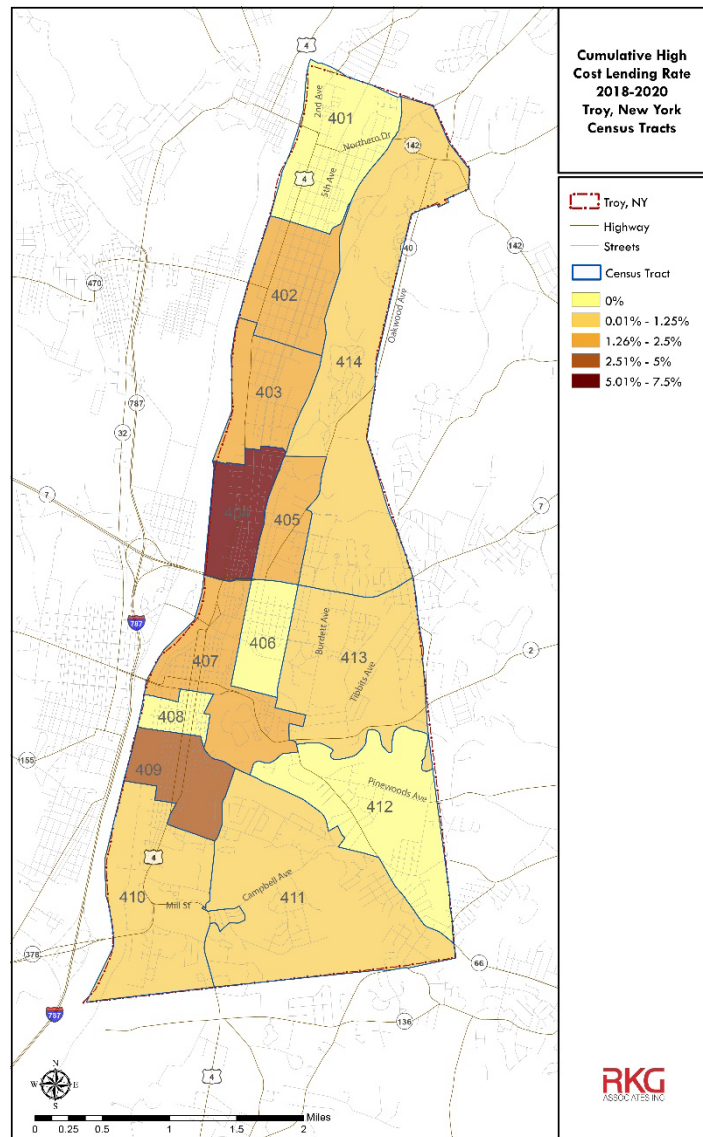
Source: HMDA data and RKG Associates, Inc., 2021

highest high-cost lending rate of 2.25%, followed by Asian borrowers, with a rate of 2.17%.

The cumulative high-cost lending rates between 2018 and 2020 were then mapped by census tract. Given that the citywide average is 0.96%, the darker shades indicate census tracts that are more likely than others to experience high-cost lending practices. High-cost lending has occurred most often in Census Tract 404, at the highest rate of 5.66%, which is almost six times the citywide average. This census tract also has the highest concentration of the Hispanic population and non-White population in Troy and is also one of the neighborhoods that have a higher exposure to poverty and less access to opportunities. Census Tract 409 has seen the second highest high-cost lending rate at 3.16% (Map 6-8).

The City should consider looking into the high-cost lending issue in areas including Census Tract 404 to determine if redlining and other impediments to homeownership opportunities exist for these neighborhoods in the private sector. If such issues did exist, then the City should consider working with the private mortgage lending industry to reduce this impediment to ensure equal homeownership opportunities across the City.

Map 6-8



F. REAL ESTATE ADVERTISING AND AFFIRMATIVE MARKETING

RKG Associates also examined Realtor websites to assess if real estate brokers and sales offices are providing information supporting people's rights to fair housing choices in their advertising and marketing practices. This assessment also identified potentially discriminatory language used on real estate listing websites in Troy's home sales and rental markets.

In general, major real estate listing services such as Century 21, Zillow/Trulia, Apartments.com, and Coldwell Banker have specific statements expressing the key principles of the Fair Housing Act and the Equal Opportunity Act. Century 21 prohibits "discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions." Also, each Century 21 Real Estate LLC franchised office is contractually required to comply, in all respects, with all laws, rules, and regulations

applicable to the real estate industry, including without limitation, the requirements imposed by the Fair Housing Act.

Apartments.com prohibits advertising “any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation, or discrimination.” Zillow/Trulia has provided a detailed article explaining the basics of the Fair Housing Law (<https://www.zillow.com/rental-manager/resources/fair-housing-guide/>). Coldwell Banker has listed the laws that protect fair housing rights, the responsibilities of home sellers and real estate professionals, and resources to seek help when the violation of rights occurs.

However, most of Troy’s local real estate agency websites do not have languages or statements related to fair housing. Three local Realtors have listed the logo of Equal Housing Opportunity at the bottom of their websites but have not provided further details.

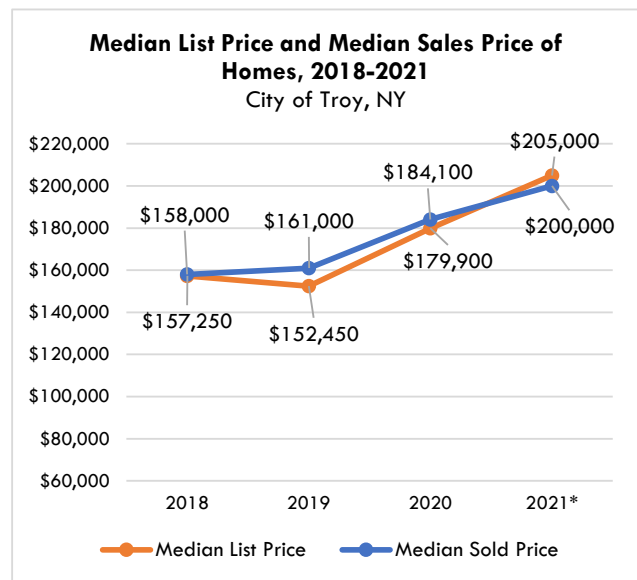
G. HOUSING MARKET OVERVIEW

Residential sales activities, home value, and rent levels are vital indicators of the overall well-being of a community’s housing market, displaying the relations between the housing demand and supply. The RKG team obtained the residential sales data from realtor.com, the median home value, and the median monthly gross rent data from the American Community Survey 2019 5-Year Estimates to provide an overview of Troy’s housing market.

1. Home Value and Sales Trend

According to the data from Realtor.com, the City of Troy is a balanced market in August 2021, which means the supply and demand of homes are about the same. The median days on market rose from 77 days in August 2020 to a peak of 113 days in March 2021, before dropping back to 79 days in August 2021. In addition, the median list price and the median sales price have been showing an upward trend since 2018 (Figure 6-2). The median sales price rose from \$158,000 in 2018 to \$200,000 in 2021 (data as of August 2021), gaining by 26.6%. The median list price has increased by 30.4% since 2018 after a dip in 2019. The median sales price has also exceeded the median list price between 2018 and 2020 before falling slightly under the median list price in 2021. This means that even though the housing supply and demand are about the same in Troy, home purchase interest has pushed up the list and sales prices of homes in the City, most likely fueled by increasing demand. This is especially true since 2020 as both the median list price and the median sales price have seen the fastest annual growth compared to the previous year (18.0% and 14.3%, respectively), most likely incentivized by the historic low interest rates during the pandemic.

Figure 6-2



Source: Realtor.com and RKG Associates, Inc., 2021

*Note: The 2021 data is as of August 2021

According to the American Community Survey (ACS) 5-Year Estimates, the median home value in Troy increased by 4.8% between 2014 and 2019, or 1% per year (Table 6-10). This corresponds with the

upward trend of the median sales and list prices of homes as discussed. It also shows that the median home value in Troy has accelerated slower than the growth of median household income annually between 2014 and 2019, which is a positive trend in that people's ability to purchase homes is keeping up with the appreciation of home values and the increase of gross rents in Troy.

Table 6-10
Median Home Value, Gross Rent and Household Income, 2014-2019
City of Troy, New York

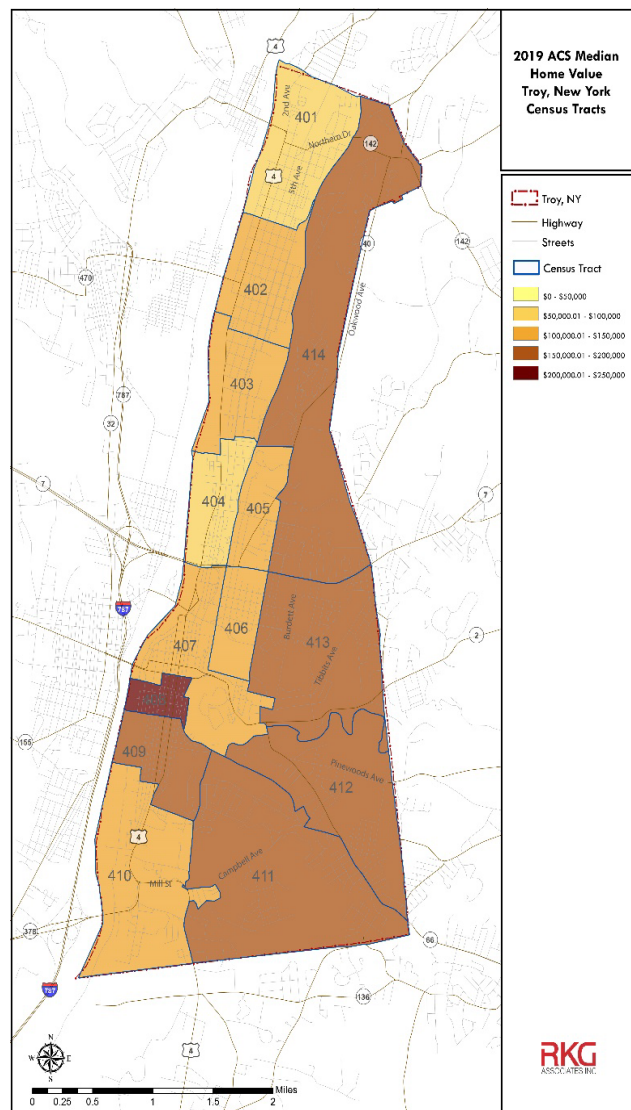
	Median Home Value	Median Gross Rent	Median HH Income
2014	\$142,900	\$832	\$39,526
2015	\$143,800	\$842	\$38,954
2016	\$144,300	\$848	\$39,847
2017	\$144,400	\$879	\$40,911
2018	\$145,800	\$912	\$41,804
2019	\$149,800	\$945	\$45,728
Change '14-'19	\$6,900	\$113	\$6,202
Ann. % Chg. '14-'19	0.97%	2.72%	3.14%

Source: 2019 ACS 5-Year Estimates and RKG Associates, Inc., 2021

Compared to the Albany-Schenectady-Troy, NY MSA, the City of Troy has proportionally more older housing stock, with 54.7% of its housing being built in 1939 or earlier compared to only 28.5% in the MSA according to the American Community Survey (ACS) 2019 5-Year Estimates. In addition, though the median home value and median sales prices of homes in Troy have increased between 2014 and 2019, the City's median home value (\$149,800) is still 29.9% lower than the MSA level of \$213,600 in 2019. Also, Troy's median contract rent in 2019 is \$797, which is also 8.7% lower than the MSA level of \$873 according to ACS.

This suggests that though Troy's housing market has been seeing increasing interest and demand in recent years following a national trend, the City's housing stock is older, of lower value and most likely in poorer physical conditions compared to the Albany-Schenectady-Troy, NY MSA. This also points to and resonates with the need for housing rehabilitation and renovation in Troy led by the City, especially for substandard housing, to preserve and increase the number of habitable housing units in the City. This can also prevent investors from outside of Troy from buying up and flipping older houses in poor conditions into higher-priced for-sale or rental homes as an investment effort, which will often undermine residents' opportunities for affordable homeownership and rental options in Troy.

Map 6-9



Map 6-9 and Map 6-10 display the 2019 median home values and the annual percentage changes of median home value between 2014 and 2019 by census tract in Troy. The data was also obtained from the 2019 American Community Survey 5-Year Estimates.

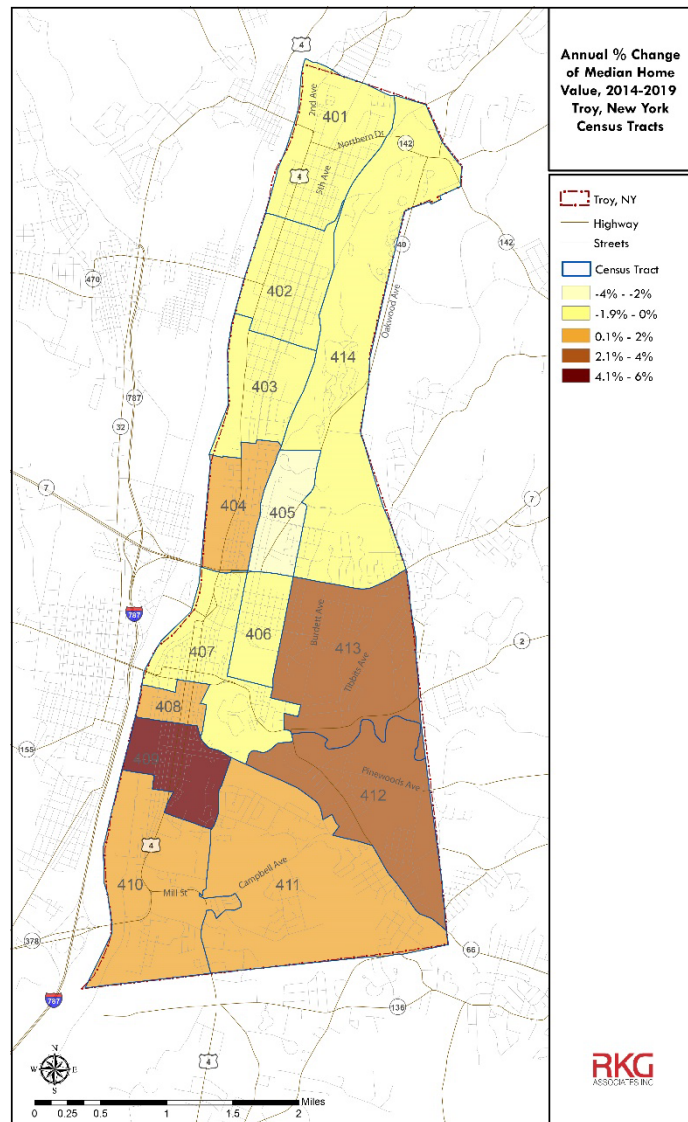
The median values of homes are generally lower in neighborhoods on the west side of the City (west of The Uncle Sam Bikeway) and north of the New York State Highway 2 where there are higher levels of poverty and less access to opportunities. In comparison, the highest home values are seen in Census Tracts 408 and 412, where there have been higher household income levels and more access to socioeconomic opportunities. Census Tract 412 has also seen the second fastest increase in its median home value between 2014 and 2019 at 2.4% per year, following Census Tract 409 with the fastest growth at 5.8% per year.

It is not surprising that Census Tracts 408 and 409 have seen some of the highest median home value and fastest median home value gains between 2014 and 2019, as these two neighborhoods south of the downtown have also experienced a more rapid increase in population and median household incomes during the same period. As Census Tracts 408 is also home to the Russell Sage College, and as Census Tracts 408 and 409 are adjacent to the Rensselaer Polytechnic Institute and major employers in the downtown area, it is likely that the high median home values and rapid home value acceleration in these neighborhoods are linked to the housing demand associated with the colleges and employment. This is followed by Census Tracts 412 and 413 which are on the southeast and east sides of the City, where there have been higher levels of household incomes and more access to housing and economic opportunities. Census Tracts 402, 406, 407, and 424 which have higher shares of housing units experiencing one or more housing conditions issues also have seen a decline or no change in their median home value between 2014 and 2019.

2. Rental Rate Overview

Table 6-10 shows that the citywide median gross rent in Troy between 2014 and 2019 rose by 13.6% or 2.7% annually. This is slower than the growth of the median household income in the City, which increased by 15.7% during those five years, or 3.1% per year, indicating a relatively healthy rental market in Troy.

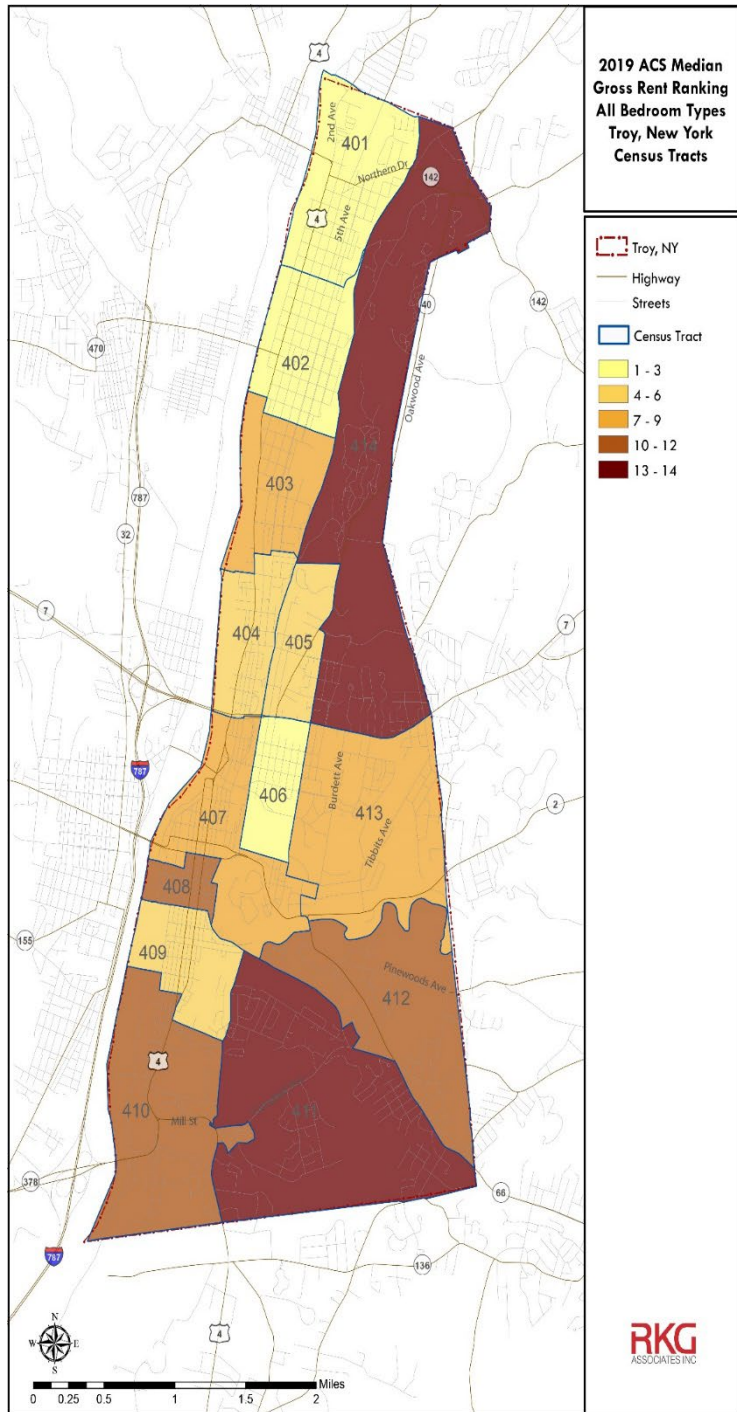
Map 6-10



RKG also adopted a ranking method to show which neighborhoods in the City have higher rent rates considering all bedroom types. All census tracts with available median gross rent data were ranked and received scores from one to 14 based on their median gross rents from low to high under each bedroom type. If the median gross rent for a certain bedroom type is not available in a census tract, then it received a score of zero. The total score of all bedroom types was then summed for each census tract, which was ranked again based on its total score.

The results were mapped by census tract, with darker shades indicating higher total scores, and therefore, higher median gross rent levels considering all bedroom types. Census Tracts 411 and 414 which are on the east and southeast sides of the City most likely have the least affordable rental market according to the ACS 2019 5-Year Estimates (Map 6-11). This generally aligns with the neighborhoods which have seen higher median home values and median household incomes in 2019.

Map 6-11



7 IMPEDIMENTS TO FAIR HOUSING CHOICE

This section summarizes the impediments to fair housing choice within the City of Troy, NY presented in this analysis and proposes recommendations to the City to address such impediments.

A. HOUSING AND SOCIAL SERVICE ORGANIZATION INTERVIEWS

The consultant spoke with 14 housing- and service-related organizations and organizations that deal with housing topics in the Rensselaer County service area in September, October, and December 2021. The purpose of the interviews was to understand the current capacity of these organizations versus the existing housing demand and to identify impediments to fair housing. All these organizations serve areas that include the City of Troy. Topics discussed include affordable housing development, housing-related services, and fair housing issues. The 14 interviewed organizations include:

- CARES of NY, Inc.,
- Habitat for Humanity Capital District,
- Independent Living Center of the Hudson Valley,
- Joseph's House and Shelter, Inc.,
- Roarke Center,
- Salvation Army,
- Troy Area United Ministries (TAUM),
- Troy Rehabilitation and Improvement Program, Inc.,
- YWCA of Greater Capital Region,
- Affordable Housing Partnership (AHP),
- Troy Housing Authority,
- Troy Industrial Development Authority (IDA),
- New York State Division of Human Rights, and
- U.S. Department of HUD Buffalo New York Field Office.

1. Affordable Housing Development

- Housing needs from families and individuals are equally high.
- There has been a surge of market-rate housing developments in the past few years, but not enough to meet current needs nor there has been as many affordable housing developments, and the demand for publicly assisted housing units such as Section 8 vouchers is still very high with a long wait time.
- The major reason behind housing issues is the low incomes among residents coupled with the lack of affordable housing units and the COVID-19 pandemic which has led to increasing unemployment.
- Should increase the incomes of people, especially in underprivileged communities due to a lack of economic opportunities to solve the housing issues.

- Another major issue is the age of housing stock and poor conditions of housing units. Families with children are especially reluctant to move into housing units with poor conditions as many landlords do not want to maintain properties, so a lot of tenants turn to publicly assisted housing projects as they have on-site maintenance.
- There is a demand for ADA-compliant housing units, especially in publicly assisted housing projects but there has not been enough supply.
- One challenge is that housing voucher holders have problems finding housing units that meet the physical housing standards. A lot of apartments charge rents well beyond subsidy coverage (tenants pay 30% of their income, and subsidy covers up to 110%), so voucher holders often are limited to substandard housing units that are cheaper, which do not meet HUD's housing physical standards and cannot be rented using a housing voucher. Additionally, housing vouchers will expire after 120 days if voucher holders cannot find qualifying housing units within that time.
- The biggest challenge that a publicly assisted housing provider faces is the owned rents which are over half a million at the moment.
- The state's emergency rental assistance program is not well utilized, especially among publicly assisted housing tenants who are late in rent payments. There have only been two approved rental assistance applications that help pay the late rent payments to a public assisted housing provider.
- One interviewee from an affordable ownership housing provider noted that the demographics of their clients have changed in the past 10 years. 80% of their clients were Black ten years ago, while in the last five years there has been an influx of refugees, such as the Burmese population, so now 40% of their clients are Black and 40% are Asian, followed by the Hispanic population. They also have seen over 50% of households headed by single female householders. Almost all the clients seeking home buyer assistance from this organization are people of color, and they are usually employed in low-wage jobs.
- Low-wage jobs, wages that have not caught up with the inflation, low generational wealth, and small savings accounts have all contributed to impediments to homeownership.
- The huge gap between the appraisal value of homes in traditionally redlined neighborhoods and the actual construction costs of homes is a major challenge. For example, the new construction cost is at least \$250,000 per home for this affordable ownership housing provider, and recent renovations usually cost \$350,000 to \$400,000. However, these homes can only sell at \$135,000 based on the appraisal value.
- Another challenge is that a lot of vacant buildings and lands are privately owned in Troy, with the land bank and the City not owning too many properties compared to Albany, where most vacant properties are owned by the city and land banks. A lot of homes are neglected for decades so the renovation and remediation costs are very high to convert these vacant properties into affordable housing. Additionally, finding and acquiring properties in Troy is much more challenging for this organization than in other places. Having more properties to purchase would make a huge difference in their affordable housing development capacity.
- A local housing trust fund for affordable housing development would be very helpful using local money instead of federal funding which is hard to predict or have limitations.
- Recommendations for creating more affordable housing: there are a lot of abandoned properties across the city (not concentrated in certain areas), so the City should convert them into affordable housing; absent landlords cause displacement issues as properties do not meet standards, so the City should regulate that as well.
- There has been an increasing demand from people with disabilities to move out of nursing homes especially since the pandemic due to fear of contracting the viruses, so the demand for accessible housing units has been on the rise.

2. Housing-Related Services

- There has been a lot of misinformation and misunderstanding about rent requirements when people lose their jobs during the COVID-19 pandemic. If tenants of publicly assisted housing projects report their new incomes or a lack of income under unemployment, they can have their rent adjusted to a very low level because rents are based on 30% of incomes. However, instead, people just assume if they lose their jobs, they do not have to pay rent, so as the late payments accumulate it would trigger evictions which could have been avoidable if tenants have accurate and timely information. So, there should be more tenant education and legal counseling services provided in the City early on. Additionally, a more robust system to prevent people from making ill-informed decisions (such as requiring proof of financial hardship to delay rent payments during the pandemic) would help reduce preventable evictions and homelessness.
- There has been an increasing demand for emergency assistance for higher storage costs (as people transition between homes), utility bills, and internet bills.
- One housing-related service provider noted that there have been more funding sources and opportunities, but also increased demand for housing services, so the funding is still tight.
- One interviewee mentioned that there is limited funding available for staff/administration and operations, but that is the real cost. Most funding sources and donors just want the money to directly fund the person in need, so there is not enough funding for staff or operations.
- Poverty, coupled with the economic impact of the COVID-19 pandemic are the major reasons behind increasing demands for housing services. On another hand, the rent in the area is so high, that housing may never be affordable to some people, and some people may never be able to get out of poverty, so creating more affordable housing is the key.
- One interviewee noted that people who need housing-related services are usually single parents with children, usually in households headed by females.
- The number of unsheltered people doubled during the COVID-19 pandemic—there were 182 unsheltered persons identified last year. This is seen for the first time nationally that there are more unsheltered persons than sheltered persons experiencing homelessness.
- Some recommendations for reducing homelessness include developing more affordable housing, expanding the housing voucher program, enforcing/ensuring anti-discrimination based on incomes, and expanding permanent housing, especially for people with mental health and substance abuse issues, and formerly incarcerated people.
- One interviewee noted that the demand for housing-related services declined during the COVID-19 pandemic, especially in 2020, and has been increasing after the quarantine ended. Homelessness has also been rising since the COVID-19 pandemic.
- One interviewee noted that food insecurity and the need for furniture assistance have been on the rise. 1/3 to 40% of the demand comes from the Black population, which is much higher than this group's share of the total population.
- The increasing demand for housing-related services is tied to the lack of affordable housing units, low wages, a lack of affordable childcare, and being overall cost burdened.
- South Troy does not have many service providers and there is a demand for them in this neighborhood.
- One interviewee mentioned that finding home care workers willing to work at low rates is a major challenge. The home care service is administered by Managed Care (Medicaid) providers, which have contracts with the state, which sets flat rates for home care workers mostly at minimal wages. Therefore, raising home care workers' wages by for example 1.5 times the minimum wage is important to meet the service needs of the vulnerable population.

- There should be more accessibility advocacy in Troy, such as focusing on promoting the accessibility of the city's sidewalks, and snow removals in residential areas.
- Another housing-related challenge is the accessibility to medical care, mental health service, and substance abuse treatment especially when a lot of services have become virtual since the pandemic. Such needs are especially dire among the underprivileged population who do not have technical resources such as the internet and cell phones with cameras to access virtual services. The City should have a program providing internet access to underprivileged people to access virtual health services.
- There has also been a lack of DSS budget for reliable access to public transportation, such as transportation cost subsidies to the people in need, so the City should have a program for this.
- One organization that provides energy efficiency and weatherization services pointed out that NYSAHC-funded program qualification is determined by household income and that applicants' assets cannot exceed \$15,000, which can be an impediment to accessing this program. For example, many low-income senior households have IRA's or 401Ks to supplement their Social Security and their total assets often exceed the threshold. In addition, not all the energy efficiency improvement and weatherization projects can be completed for various reasons. Issues such as leaking roofs, mold, asbestos, and clutter often prevent energy projects from moving forward. There is a great need for energy efficiency improvements and the demand keeps growing. Having access to enough funds that are flexible and can be used to provide gap funding on energy-saving projects would go a long way in providing access to healthy and safe housing.

3. Fair Housing Issues

- One interviewee from an emergency shelter providing organization mentioned that 2/3 of the people in shelters are single adults, and among them, 2/3 are male. Additionally, though the African American population only accounts for 17.5% of the total population according to American Community Survey (ACS) 2019 5-Year Estimates, around 40% of the people living in that emergency shelter are African Americans, which is over twice the ACS percentage.
- Additionally, 57% of the single individuals staying in the emergency shelter have mental health conditions, 49% have substance abuse issues, and 38% have chronic health conditions.
- Increasing evictions linked to late payments have put a huge strain on the landlord-tenant relationship. Though landlords can apply for state rental assistance, few do so because of the complicated application process coupled with the misinformation about landlords not being able to evict tenants for up to a year if they accept rental assistance (which is not accurate).
- The biggest fair housing issue before the pandemic is the improper eviction process, as well as the reluctance of landlords to accept Section 8 vouchers and other tenant-based housing subsidies.
- Many of the people experiencing homelessness, quick turnovers of housing, and unstable housing situations are the vulnerable groups.
- The current challenge is that people are stuck in affordable housing and cannot move into homeownership.

B. DEMAND EXCEEDS SUPPLY FOR THE SECTION 8 VOUCHER PROGRAM

The City of Troy identifies the availability of funds as the primary obstacle in meeting the underserved needs of low- and moderate-income populations. The Troy Housing Authority (THA) administers the Section 8 voucher program in Troy. The Troy Housing Authority opened the application for one week in May 2021 after closing it for four to five years absorbing the previous waitlist and has received around 600 applicants on the new waitlist, mostly for the Section 8 program. According to the data

provided by the Troy Housing Authority in July 2021, the average wait time for the Section 8 vouchers is around 148 days. This indicates a continuing demand for the Section 8 program and units.

Though a THA staff noted that the funding has been steady in recent years with small increases, the increase has mostly been operation fund adjustments instead of for new Section 8 vouchers. THA staff also noted that Troy Housing Authority does not have a housing development office, and their current goal is to maintain the existing portfolio instead of expanding due to the limitation in funding. The City should continue utilizing the housing delivery system that the City has had in place for many years, including resources such as homeownership and housing rehabilitation opportunities for low- to moderate-income families, as well as leveraging private dollars and various funding sources. The City should also consider creating an Affordable Housing Trust Fund using local funding sources such as revolving loans and developers' payments in lieu as federal funding sources are not as predictable.

C. LIMITED CAPACITY TO INCREASE THE SUPPLY OF AFFORDABLE HOUSING

The City faces the challenge of limited organizational capacity to increase the supply of affordable housing. The City does not have a dedicated affordable housing development agency, and the Troy Housing Authority currently does not have the funding available to develop new affordable housing projects despite some redevelopment efforts.

In a city the size of Troy (49,458 pop.), this lack of organizational depth in affordable housing development still imposes an impediment to the fair housing opportunities in Troy. The City should consider developing a mechanism to expand partnerships with the Troy Housing Authority, as well as neighborhood-based and regional nonprofit developers (such as Habitat for Humanity) or religious-affiliated organizations to address these issues and to provide support for these organizations. As previously mentioned, the City can also explore the opportunity of establishing an Affordable Housing Trust Fund and an entity to administer and manage the trust fund for affordable housing development in Troy.

It is worth noting that throughout the consultant's conversations with the housing-related organizations in the region, a common theme has been the lack of affordable housing units that are safe, clean, and habitable in Troy. This does not necessarily mean a shortage of housing units, as it is pointed out by the City that Troy has been disproportionately serving the region with low-cost housing units. Rather, many housing units in Troy are usually with lower costs and are of poor or substandard physical conditions, and though they might be "affordable", are not deemed as affordable housing units available or suitable for living in. This is where the real shortage exists, and it is emphasized by the interviewed housing advocacy and service organizations. As mentioned in the Private Sector Practices Chapter, according to the American Community Survey (ACS), Troy has proportionally more housing units built before 1940 and more housing units that are of lower value or rent levels compared to the metropolitan area. These facts speak to the need for addressing the housing quality issues to increase the number of safe and habitable housing units in Troy while also preserving their affordability. For example, the City can lock the home value and rent levels of the housing units that utilize City funding for renovation and rehabilitation for several years especially when these units are to be sold to or serve low- and moderate-income households.

D. CONCENTRATION OF MINORITY POPULATIONS IN LOWER-INCOME AREAS WITH LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES

The City's population has become more diverse since 2000, particularly the Hispanic and non-White populations. The concentrations of minority populations still align with neighborhoods with higher exposure to poverty and fewer resources and access to opportunities. The Hispanic and the Black

population have lower scores for many of the HUD Indexes and socioeconomic indicators. The Hispanic population also constitutes the fourth largest immigrant group in Troy, with many of them having limited English proficiency.

According to RKG's census tract analysis, Census Tracts 401, 402, 403, 404, and 407 east of The Uncle Sam Bikeway and around and north of the City's downtown area are exhibiting conditions of higher poverty, lower levels of labor market engagement, poorer environmental health, concentrations of minority households, and less home value appreciation. This may be partially due to the limited affordable housing choices in other parts of the City.

The City's 2018 Realize Troy Comprehensive Plan has made it a goal that "a variety of housing types in terms of housing form, tenure and affordability will be promoted." The Plan also mentions that "an Affordable Housing Action Plan will be developed by the City and its housing partners to encourage greater affordable options within the neighborhoods with mixed-income housing close to transit, local amenities, and employment areas." However, there is a lack of more detailed and specific policies to promote a diversity of housing types to accommodate residents of various races, incomes, household sizes, lifestyles, ages, and levels of ability and mobility throughout the City. The City should consider creating concrete policies and action strategies for these goals and intervene with services and investments to improve conditions for minority households in this part of the community. The City should also increase quality affordable housing options in other parts of the City to allow for more fair housing choices citywide for all people.

To achieve affordable housing on a scale that is commensurate with the need, development densities are often required. Densities of 24 units per acre are typical apartment densities and should be permitted throughout the City in appropriate locations. Currently, the City's R3, R4, and R5 zones meet such requirements, with the maximum density starting from 21.5 units per acre under the R3 zone and going up to 120 units per acre for high-rise uses under the R5 zone. A review of the City's zoning map confirms that while there are several R3 and R4 zones on the west side of the City along the 5th Avenue, between 103rd Street and Middleburgh Street, just south of the downtown area, and scattering on the east and south sides of the City. However, R1 and R2 zones are more prevalent throughout the City, while there are fewer R4 zones and R5 zones are limited especially on the east side of Troy. Multi-family zoning districts are appropriate where new highway interchanges with close access to employment centers and near shopping and services. The City should consider other locations to expand its higher density residential zoning throughout the community.

It is recommended that the City undertake the preparation of an affordable housing strategy to identify ways to expand the supply and attract potential for-profit and non-profit development partners. The City should also assist with the creation of neighborhood-based CHDOs to partner with the City in this effort.

E. LIMITED ACCESS TO RESOURCES AND OPPORTUNITIES IN PUBLICLY SUPPORTED HOUSING NEIGHBORHOODS

The Low Poverty Index, Labor Market Engagement Index, and Environmental Health Index all show lower scores for census tracts with concentrations of publicly supported housing programs and Section 8 Voucher households compared to the rest of the City. These neighborhoods are generally located west of The Uncle Sam Bikeway and have seen lower median household incomes and homeownership rates. HUD discourages its recipients from targeting its CDBG funds in a way that encourages such conditions.

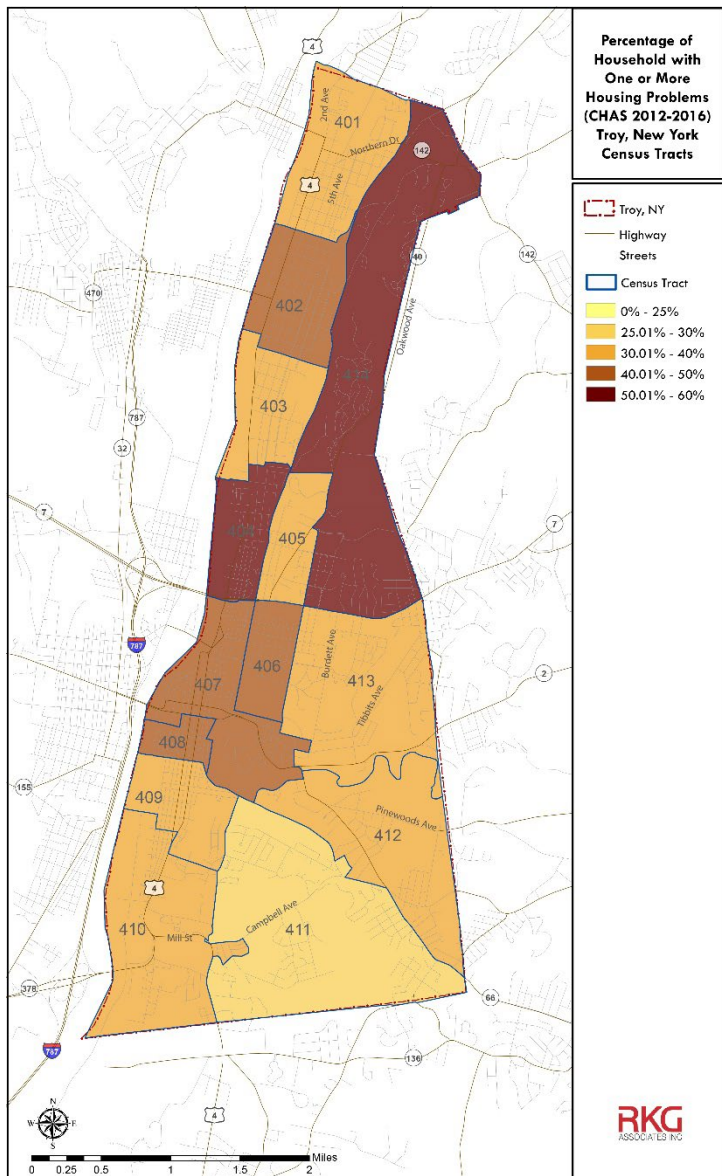
As the City looks for new projects for their available funding, the City should consider increasing the financial support for community-based nonprofit organizations, continue to seek additional funding

sources such as by creating an Affordable Housing Trust Fund, and expand partnerships with regional service providers to increase the support capacity for employment, housing, accessibility, mental health, and substance abuse treatments. In addition, the City can explore alternative approaches such as zoning revisions to require and incentivize citywide developer contributions to public improvements targeting low- and moderate-income neighborhoods (such as tree planting, accessibility modifications, snow removals, sidewalk constructions, etc.).

F. HOUSING CONDITION PROBLEMS IN SOME NEIGHBORHOODS

As discussed in the chapter on Demographic and Housing Condition Analysis, neighborhoods on the west side of the City with concentrations of Section 8 Voucher households and publicly supported housing programs, as well as Census Tract 414 have seen higher percentages of their housing units with one or more housing condition issues (Map 7-1). These housing units are also especially susceptible to natural disasters and the impacts of inclement weather. This finding might point to the need for expanding the Owner-Occupied Exterior Enhancement Program – not only to improve owner-occupied dwelling units with exterior issues in designated target areas, but also other units including rental housing occupied by low- and moderate-income households and individuals throughout the City with various rehabilitation needs. The stakeholder interviews also reveal that there is a lack of safe and affordable rental options in Troy, as the negligence of absent landlords often contributes to this issue. This also places an impediment to fair housing choices as the interviews reveal that many Section 8 Voucher holders cannot find housing because a lot of residential rental properties have housing condition problems that do not qualify as per HUD's requirements.

Map 7-1



Interviews with Troy's community service organizations also reveal that it has been challenging to redevelop underutilized or vacant residential properties into affordable housing, as the renovation and remediation costs are notably high because a lot of homes are privately owned and are neglected for decades with serious housing

condition issues. The City should partner with the Troy Community Land Bank to acquire and assemble privately-owned vacant properties for redeveloping into affordable housing working with for-profit and non-profit housing providers and developers. In addition to expanding the housing rehabilitation program, the City can also consider creating incentives for residential property owners to maintain the housing conditions or to sell the distressed properties to the City. For example, the City could consider charging a fee that funds the Affordable Housing Trust Fund for citywide housing rehabilitation if a house's conditions fall under a certain minimal standard, or an option for the owner to sell the property to the City or the Troy Community Land Bank. This agrees with the City's goal to "increase support of the Troy Community Land Bank in undertaking strategic rehabilitation and renewal activities" according to the 2018 Comprehensive Plan.

Another recommendation would be to increase the financial support for the City's Code Enforcement program and expand its service scope. The City's CDBG allocation to the Code Enforcement program is limited, and therefore, it can only support emergency projects that are under \$5,000 and cannot support major repair needs. In addition, as discussed in the Public Policy Review Chapter, the CDBG allocation for the Code Enforcement program declined from \$275,000 to \$200,000 between FY2016 and FY2021 by 27.3%. Therefore, the City should make efforts to expand funding sources for the Code Enforcement program to serve more housing repair needs that require higher budgets, prioritizing low- and moderate-income households.

As mentioned in the previous chapter, the City embarked on a Landlord Registry for rental housing units around 10 years ago but never proceeded to further the implementation of a Residential Occupancy Permit (ROP) program. Given the increase in the number of absentee landlords in Troy (particularly out of town absentee owners), it is also recommended that the City should establish a coordinated tracking system to monitor the conditions of existing rental housing units in Troy. The City should also use this tracking system to hold landlords accountable for housing code violations and for renovations or rehabilitation necessary to bring their properties back to safe and habitable standards, while also preserving the affordability of these units. This is an essential and meaningful approach to address the shortage of affordable housing units that are available and habitable in Troy.

Census Tracts 402, 404, 406, 407, 408, and 414 are showing signs of blight that, if left unchecked, will negatively impact the economic vitality of the community (Map 7-1). In fact, Census Tracts 402, 406, 407, and 414 have all seen a decline or no change in their median home value between 2014 and 2019 according to ACS as discussed in previous sections. Housing units in these areas are also more likely to be impacted by natural disasters and climate change, further increasing the risk of financial distress and homelessness, especially for the most vulnerable and underprivileged population. This situation can potentially provide an opportunity for the City to leverage resources to upgrade both owner- and renter-occupied housing especially for low- and moderate-income households.

G. LENDING POLICIES AND PRACTICES

One indication of a barrier to fair housing may be the denial rate for conventional home purchase loans. Although differences in denial rates for whites and minorities may be due to legitimate factors such as income or credit history, a portion of the disparity may be attributable to the persistence of discriminatory policies among certain lenders. Another indicator may be high-cost lending practices that target minority borrowers. According to RKG's analysis, high-cost lending has occurred most often in Census Tract 404, at a rate of 5.66%, which is almost six times the citywide average (Map 7-2). This census tract also has the highest concentration of the Hispanic and non-White population in Troy and is also one of the areas with higher exposure to poverty and less access to opportunities.

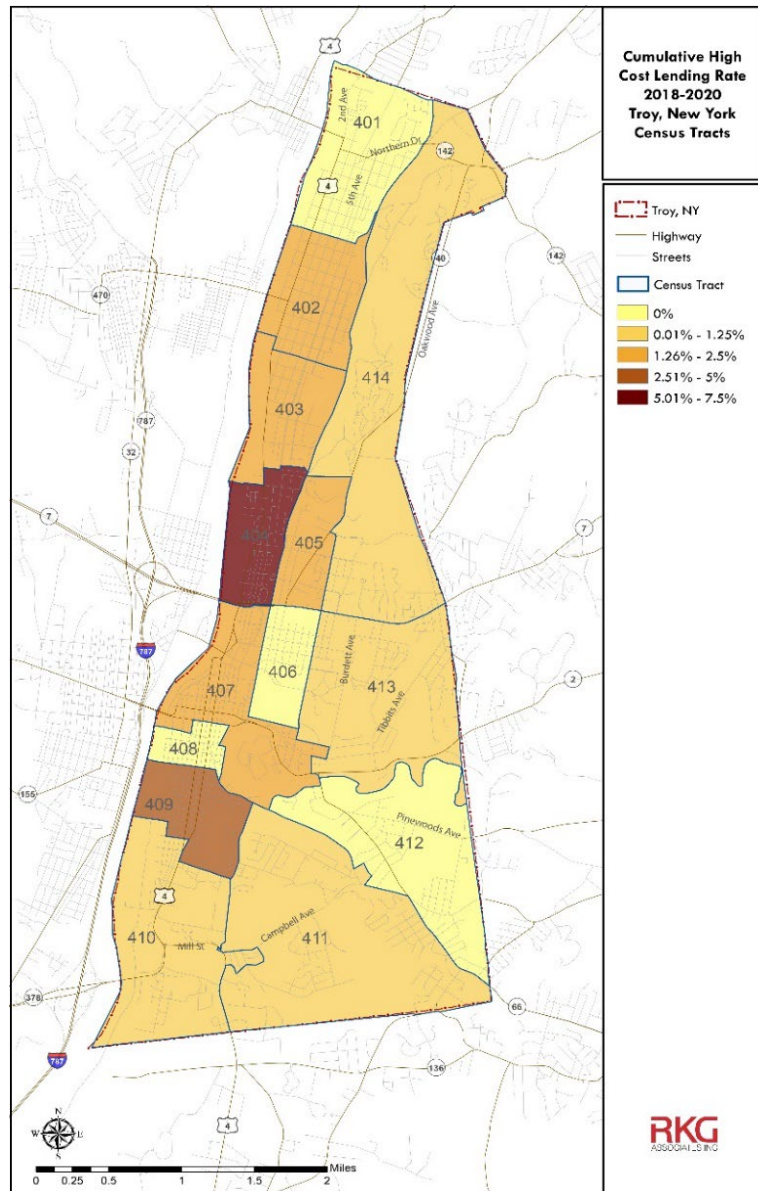
The City should investigate this issue and provide legal and financial support to detect and combat potential discrimination in private lending practices. For example, the City should expand fair housing and homebuying education efforts and consider establishing a reporting system for private lending discrimination complaints.

H. SHORTAGE OF AFFORDABLE HOMEOWNERSHIP HOUSING

The City of Troy's housing values have continued to rise during the past few years, which may make it difficult for lower-income persons to become homeowners. As discussed in Chapter 6, though the City's median home value (\$149,800) is 29.9% lower than the MSA level of \$213,600 in 2019, the median sales price of a home in Troy rose from \$158,000 in 2018 to \$200,000 in 2021 (data as of August 2021), gaining by 26.6%. The median home value also increased from \$142,900 in 2014 to \$149,800 in 2019, gaining by 4.8% according to the American Community Survey (ACS) 2014-2019 5-Year Estimates.

The City supports a range of services and programs that meet the needs of low- and moderate-income households, including the Homebuyer Incentive Program (HIP) administered by the Troy Rehabilitation and Improvement Program (TRIP). The City's 2018 Comprehensive Plan also states to "continue to develop homeownership incentive programs to attract new residents and to support existing residents looking to purchase a home within the city". Future planning and development activities should follow this principle to increase the ownership rate among low- and moderate-income households, especially through increasing the number of safe and habitable ownership homes priced affordable to low- and moderate-income households by renovation, rehabilitation, and redevelopment of existing substandard housing, increasing homebuying financial subsidies and procedural assistance, and reducing redlining and high-cost lending in the private mortgage lending sector.

Map 7-2



I. SHORTAGE OF AFFORDABLE RENTAL HOUSING

As discussed in Chapter 6, Troy's median contract rent in 2019 is \$797, which is 8.7% lower than the MSA level of \$873 according to ACS. However, the City's monthly median gross rent rose from \$832 in 2014 to \$945 in 2019 according to ACS, at a rate of 13.6%, faster than the median home value change of 4.8% during the same period. Rental housing shortages are common for many, if not most, jurisdictions since the provision of housing for this income and lifestyle cohort often requires public sector subsidies which have been limited.

The City has continued to experience a surge of needs for housing assistance, especially from renters since the COVID-19 pandemic. Based on the interviews with Troy's community service organizations, there is an increasing demand for emergency assistance with eviction prevention, utilities, and internet bills. It is also anecdotally observed that there is not enough capacity for community service organizations to serve those in need, and there is a lack of affordable, safe, and habitable rental properties that meet housing standards in Troy, especially for low- and moderate-income households. Section 8 Voucher holders also often face the challenge of finding affordable rental options charging rents that the housing voucher could cover with acceptable housing conditions. In addition, it is anecdotally observed that though there have been many high-end rental apartment developments in the recent few years in Troy, there have not been enough affordable housing developments.

The City should consider taking a bigger role in increasing the number of affordable housing units in Troy, especially through renovating, rehabilitating, and redeveloping existing substandard and uninhabitable housing units while also preserving their affordability, as Troy is faced with the challenge of increasing numbers of absentee landlords and a decline of safe and habitable rental units that are affordable. HOME funding should be utilized alone or in conjunction with other funding sources such as an Affordable Housing Trust Fund to purchase, rehabilitate, or construct units as rental housing for households at or below 80% of Median Family Income. More importantly, the City needs to expand its partnership with local and regional for-profit and non-profit housing providers and developers to increase the number of affordable rental units through redevelopment, new construction, and in-fill developments. The City should also continue to support and encourage developers proposing to develop Low Income Housing Tax Credit (LIHTC) projects within the City. These projects typically combine market rate (not subsidized) and affordable units (investor subsidized) for people making 60% to 80% of area median incomes. LIHTC projects are syndicated development deals, usually with the involvement of the State's Housing Finance Agency, to attract investor equity to a project to make some units affordable.

J. LIMITED SUPPLY OF SUPPORTIVE HOUSING AND SERVICES FOR PERSONS WITH DISABILITIES AND PEOPLE WITH MENTAL HEALTH/SUBSTANCE ABUSE ISSUES COUPLED WITH AN OVERALL COST BURDEN

Disability is the second most common basis for housing discrimination complaints, appearing in half of all complaints received by HUD's Buffalo Field Office between 2016 and 2020. The most common disabilities cited were cognitive problems and ambulatory difficulties, inflicting 7.8% and 7.5% of the total population according to HUD. These needs require increasing the provision of housing that is specifically designed to meet the Americans with Disabilities Act (ADA) standards to accommodate people with ambulatory or other physical disabilities, in addition to providing supportive services. Cognitive issues could be impacting elderly residents at a higher rate, or there may be housing needs related to the group of people with cognitive or learning disabilities. Based on the information gathered from stakeholder interviews, there is a shortage of housing units that meet ADA standards in publicly assisted housing projects that serve low- and moderate-income households and individuals.

The stakeholder interviews also reveal that there has been an increasingly dire demand for supportive housing with home care services, treatment services, and internet access to virtual medical/mental health services for people with disabilities, mental health issues, and substance abuse issues. Interviewed community service providers noted that often 60% to 90% of their residents have mental health issues and over half have substance abuse issues. However, this vulnerable population is often challenged with unstable or no access to treatment services due to low incomes and difficulty accessing the internet for virtual services, especially since the COVID-19 pandemic. Interviewees also mentioned that it has been increasingly difficult to hire home care workers for people with disabilities in supportive housing as the State established wage levels for home care workers are merely close to the minimum wage. Often, these home care workers would also become cost burdened and face housing challenges because of the low wage levels. Additionally, almost all the interviewed stakeholders noted that low wages and the overall cost burden are major impediments to fair housing in Troy, as high costs of childcare, transportation, internet access to treatment and services, and other housing related costs undermine people's ability to secure stable housing.

The City should expand public/private partnerships to obtain property to increase the accessible, affordable housing stock that meets ADA requirements with supporting services. The City should also seek to provide accessibility modification improvements through the CDBG or HOME funds and increase support for community-based nonprofit organizations that provide housing-related services to the population with disabilities, mental health issues, and substance abuse issues. This agrees with one of the goals outlined in the City's 2018 Comprehensive Plan, which is to "provide accessible housing options". Specifically, the Plan noted that "new and rehabilitated housing should aim to meet or exceed the Americans with Disabilities Act standards." An example is that the City of Norman in Oklahoma is currently developing a Visitability Ordinance which will incentivize developers to construct or modify units to the adopted Visitability Standards. The new Ordinance draft includes several different levels of modifications that a developer can pursue. In addition, all new constructions funded by Norman's HOME program are designed to meet these standards at the minimum. Troy should consider similar policy approaches to provide more access to affordable housing opportunities and supportive services to the vulnerable and underprivileged population.

K. INCREASE FAIR HOUSING EDUCATION AND ENCOURAGE REAL ESTATE SALES AND PROPERTY MANAGEMENT COMPANIES TO INCLUDE FAIR HOUSING LANGUAGE IN REAL ESTATE LISTINGS

Based on RKG's review of the real estate websites, it appears that most of Troy's local real estate firms engaged in the sale and rental of residential properties do not promote statements in accordance with fair housing laws. The National Association of Realtors requires that its members adhere to the following practices:

- Provide equal professional service without regard to the race, color, religion, gender (sex), disability (handicap), familial status, national origin, sexual orientation, or gender identity of any prospective client, customer, or the residents of any community.
- Keep informed about fair housing laws and practices, improving my clients' and customers' opportunities and my business.
- Develop advertising that indicates that everyone is welcome, and no one is excluded; expanding my client's and customer's opportunities to see, buy, or lease property.
- Inform clients and customers about their rights and responsibilities under the fair housing laws by providing brochures and other information.
- Document efforts to provide professional service, which will assist members in becoming more responsive and successful REALTORS.
- Refuse to tolerate non-compliance.

- Learn about those who are different from me and celebrate those differences.
- Take a positive approach to fair housing practices and aspire to follow the spirit as well as the letter of the law.
- Develop and implement fair housing practices for my firm to carry out the spirit of this declaration.

The City of Troy should partner with local housing service providers such as Troy Rehabilitation and Improvement Program, Inc. (TRIP) to provide annual reminders to Realtors and property management firms that they should promote Fair Housing practices and provide affirmative statements in their marketing materials, brochures, website, and all their real estate listings.

In addition, the City currently does not have any partnership with fair housing counseling organizations such as United Tenants of Albany, Inc. which provide fair housing education and housing discrimination mediation. The City should consider allocating parts of its available funding to contract such organizations to conduct direct outreach and education on fair housing issues, including tenant rights and obligations, for both tenants and landlords. As some interviewed stakeholders noted, the lack of accurate information for tenants has led to eviction risks that could have been avoided. Many residents are late in rent payments as they thought they do not need to pay due to unemployment during the COVID-19 pandemic. It is also beneficial for Troy to contract such organizations to provide mediation/legal services for low- and moderate-income households in relation to fair housing issues.