

Analysis Of Impediments To Fair Housing



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EXECUTIVE SUMMARY

Impediments Found

An analysis of the 2008 to 2012 American Community Survey data and most recent Home Mortgage Disclosure Act (HMDA) reports found no impediments to fair housing choice. The lack of discrimination complaints filed locally or with New York State or the federal government suggests a lack of housing choice limitations. There were no recommendations concerning fair housing choice problems or issues provided by the service agencies or the public.

Actions to Address Impediments

The Town of Union has taken a number of steps to ensure that its programs and actions are administered and advertised in a manner that encourages wide participation by all segments of the population. The Town has undertaken specific housing programs to promote wider housing choice by providing financial assistance for owner occupied housing rehabilitation, rental property rehabilitation, and mortgage assistance to purchase housing. The rehabilitation program incorporates necessary repairs to improve the housing stock and to make the units accessible to the disabled population. The rental assistance program has been administered in a manner to allow the widest choice of housing and to allow easy access to employment, education, and services.

INTRODUCTION

The United States Department of Housing and Urban Development (HUD) requires the Town of Union to certify that the Town will affirmatively further fair housing as part of its obligations assumed when the Town accepted HUD program funds. Sections 104(b)(2) and 106 (d)(5) of the Housing and Community Development Act of 1974, as amended, specifically require Community Development Block Grant (CDBG) program recipients to certify that they will affirmatively further fair housing. Although the Town's obligation arises in connection with the receipt of this Federal funding, the affirmatively furthering fair housing obligation is not restricted to the design and operation of HUD-funded programs, but extends to all housing and housing-related activities in the Town, whether publicly or privately funded. HUD interprets the fair housing obligation to mean:

- Analyze and eliminate housing discrimination in the Town;
- Promote fair housing choice for all persons;
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promote housing that is physically accessible to, and usable by, all persons, particularly persons with disabilities; and
- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

Segregation by race and ethnicity and restricted housing choices for persons with disabilities and families with children, in particular renter families, are formidable problems facing America. The impact of these problems extends far beyond housing issues. Equal and free access to housing is fundamental to meeting essential needs and pursuing personal, educational, employment, or other goals.

For many individuals and families, residential location largely determines the type and quality of jobs, social services, health care, education, banking and insurance services, recreational opportunities, and other aspects of community life. This is particularly true for those whose incomes are limited and are forced to live in areas where the quality of life is not very desirable. Housing discrimination intensifies the economic dimensions of restricted housing choice. Lower income minorities, persons with disabilities, and families with children bear the heaviest burden of discriminatory practices, but higher income households in these groups also may face major discriminatory barriers. Because housing choice is so critical, fair housing is a goal that government, public officials, and private citizens must achieve if equality of opportunity is to become a reality.

The Town of Union has undertaken this update of the Analysis of Impediments (AI) to fair housing choice initially prepared in 1995 to become fully aware of the nature, extent, and causes of any local fair housing problems that may exist and outline the resources available to solve them. Without this information, the fair housing planning process will fall short of measurable results and energy and resources that could have been used more effectively with careful planning and execution may be wasted. A properly completed Analysis of Impediments provides this information.

Generally, the Analysis of Impediments contains an analysis of impediments to fair housing choice within the Town, recommendations for appropriate actions to overcome the effects of any impediments identified through the analysis, and the maintenance of records reflecting the analysis and actions in this regard. The purpose of the Analysis of Impediments is to:

- Serve as the substantive, logical basis for fair housing planning;
- Provide essential and detailed information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates to help build public support for fair housing efforts both within the Town of Union and Broome County area.

The Analysis of Impediments will include:

- The methodology and procedures used to develop AI;
- An Executive Summary including impediments found and actions to address impediments;
- Demographic patterns;
- The nature and extent of fair housing complaints/suits or other data;
- Public sector policies, practices, and procedures involving housing and housing related activities, including zoning and land use policies, tax abatement practices, and patterns of occupancy in the Housing Choice Voucher program;
- Private market issues, such as lending policies and practices, Home Mortgage Disclosure Act (HMDA) data and patterns of occupancy in private rental housing;
- Public and private sector fair housing enforcement and information program; and
- Conclusions and recommended actions to address the impediments identified.

METHODOLOGY AND PROCEDURES

This update of the Analysis of Impediments was undertaken by the Town of Union Planning Department as part of the planning process for the Federal Fiscal Year 2014 CDBG Annual Plan submission and in preparation for the 2015-2019 Consolidated Plan which is due to be submitted to HUD by August 16, 2015. As of the 2012 5-Year American Community Survey, the Town of Union accounts for approximately 28% of the County's population.

The planning process for the original AI used three methods to solicit information and recommendations. Requests for information and recommendations were mailed to various agencies and lending institutions. Public Meetings were held at the Town of Union Office Building to take testimony for the Consolidated Plan and AI. Newsletters were sent to appropriate agencies and lending institutions notifying them of the Public Meetings. Lastly, the Town of Union held formal Public Hearings on the Consolidated Plan and AI. The current update of the AI allowed the Town to provide a more current review of Home Mortgage Disclosure Act (HMDA) data, including mapping, and Fair Housing complaint data for Broome County. The previous update took place as part of the planning process for the Town's FFY 2010-2014 Consolidated Plan which was submitted to HUD in August of 2010.

To assemble information for the original Analysis of Impediments the Town used a mailing list prepared for the Consolidated Planning process to contact agencies and interested individuals for information. The Town uses a newsletter format that is typically sent to more than eighty contacts.

Besides the request for information in defining issues and providing recommendations to improve the problems, HMDA data for the financial institutions was accessed via the Internet. In addition, the latest Census and American Community Survey were used to provide the most recent demographic data available.

POPULATION AND HOUSING CHARACTERISTICS

Population and Age

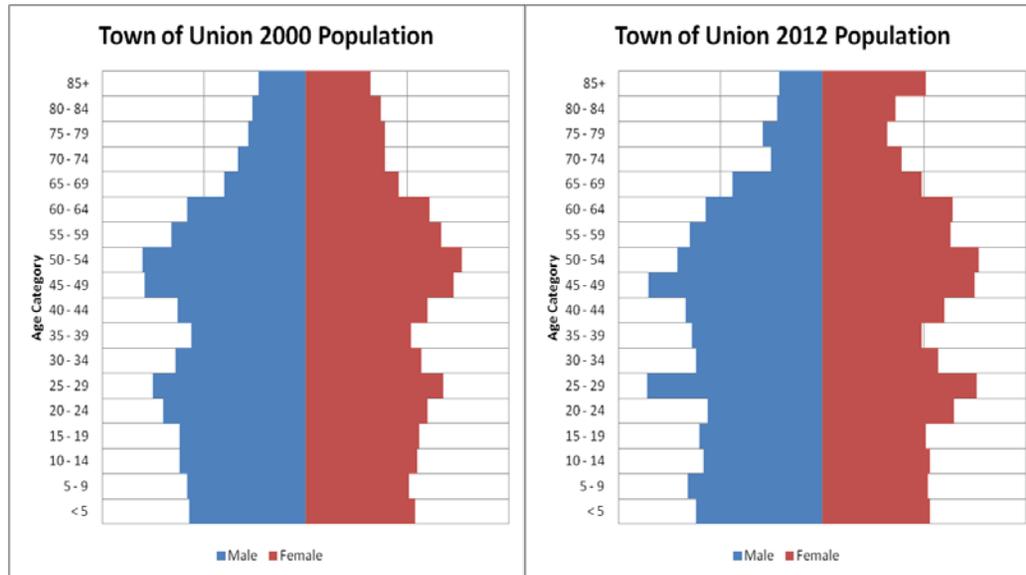
In 2012, the Town of Union was the largest municipality in Broome County, its 56,102 people accounting for 28% of Broome County's population. The Town's total population began declining in the 1970s and continued through to the end of the 20th Century. The population, between 1980 and 1990, declined 2.3% and ten years after this period, the population was further reduced another 5.8%. This decline is attributable to the loss of the area as an industrial center and the natural aging of the population. More recently, the populations for both the Town and County, except for Johnson City, have stabilized. It is difficult to make longer range predictions from the ACS estimates from 2010 to 2012, but should the trend continue linearly, the population may return to single digit percentage losses in the county and every part of the Town.

Table 1
Town of Union
Population 1980-2012

Municipality	1980 Pop.	1990 Pop.	2000 Pop.	2010 Pop.	2012 ACS	1980-1990 % Change	1990-2000 % Change	2000-2010 % Change	2010-2012 % Change
Town of Union	61,179	59,786	56,298	56,346	56,102	-2.3	-5.8	0.1	-0.4
Part - Town	29,596	29,677	27,725	27,780	27,658	0.3	-6.6	.2	-0.4
Endicott	14,457	13,531	13,038	13,392	13,312	-6.4	-3.6	2.7	-0.6
Johnson City	17,126	16,578	15,535	15,174	15,132	-3.2	-6.3	-2.3	-0.3
Broome County	213,648	212,160	200,536	200,600	199,928	-0.7	-5.5	0.0	-0.3

Source: U.S. Census Bureau 2010, American Community Survey 2008-2012

The two population pyramids below show a general aging of the population from 2000 to 2012. However, the increase in working age young people in 2012 is inconsistent with the younger population in the preexisting decade and indicates not only a reversal in emigration from the area but a newer influx of young families to the Town.



Sources: Census 2000 and American Community Survey 2008-2012

Race/Ethnicity

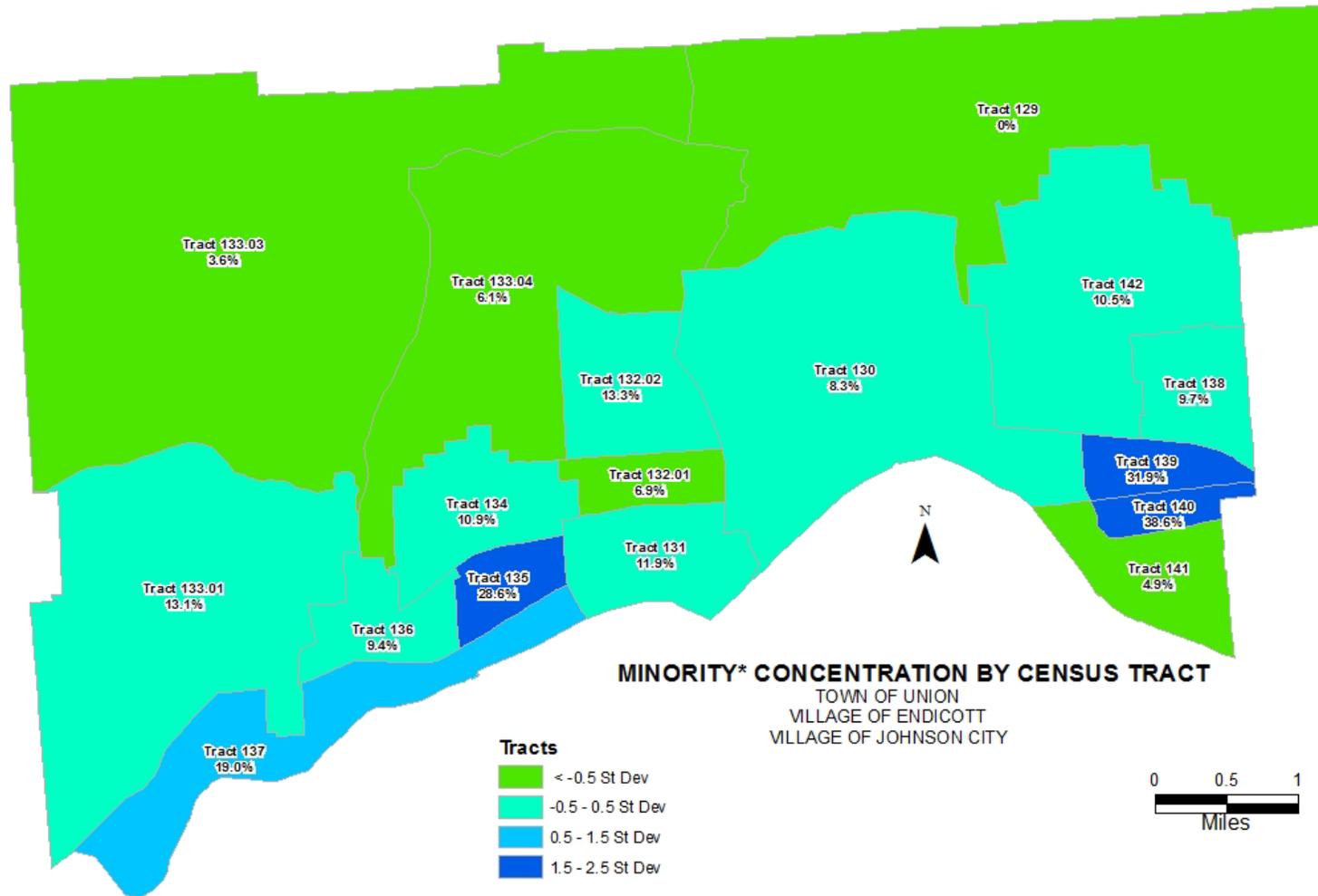
From 2000 to 2012 the relative minority population increased in the Town. The total minority population of the Town is 12.8%, with minority being defined as any individual claiming any racial or ethnicity category other than single racial category White and non-Hispanic/Latino ethnicity. Blacks presently constitute the largest racial minority in the Town at 4.2% of the total population. Blacks comprise more than 10% of the population in Census Tract 135 (14.0%), 137 (11.0%), 139 (12.3%). Asians are the second largest racial minority with 2.4% of the Town population with the greatest percentage in Census Tract 140 (18.7%). Individuals with more than one race or of another racial definition make up 2.4% of the Town’s population. Individuals with Hispanic/Latino ethnicity consist of 3.5% of the Town’s population with the largest concentration being in Census Tract 132.02 (9.0%).

**Table 2
Town of Union
Racial/Ethnic Distribution by Municipality and Census Tract 2010**

		Race (Non Hispanic/Latino)						Ethnicity
		White	Black	Asian	Native American	Pacific Islander	Other or Multi	Hispanic/Latino (Any Race)
Census 2000	Town of Union	95.6%	2.4%	2.7%	0.2%	0.0%	1.2%	1.5%
	Town of Union	87.2%	4.2%	2.4%	0.2%	0.0%	2.4%	3.5%
American Community Survey 2008-2012	Endicott	84.8%	7.3%	1.8%	0.1%	0.0%	3.1%	3.0%
	Johnson City	81.8%	4.4%	5.3%	0.2%	0.0%	3.3%	5.0%
	Part Town	91.3%	2.6%	1.2%	0.2%	0.1%	1.7%	2.9%
	Broome County	86.3%	4.4%	3.5%	0.3%	0.0%	2.1%	3.4%
	Tract 129	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
	Tract 130	91.7%	2.0%	1.5%	0.0%	0.4%	0.6%	3.9%
	Tract 131	88.1%	4.3%	2.0%	0.8%	0.0%	1.2%	3.6%
	Tract 132.01	93.1%	0.8%	0.0%	0.0%	0.0%	0.0%	6.2%
	Tract 132.02	86.7%	0.0%	2.5%	0.0%	0.0%	1.8%	9.0%
	Tract 133.01	86.9%	8.8%	0.9%	0.8%	0.0%	2.3%	0.3%
	Tract 133.03	96.4%	0.6%	0.0%	0.0%	0.0%	1.4%	1.6%
	Tract 133.04	93.9%	0.7%	1.5%	0.0%	0.0%	3.0%	0.9%
	Tract 134	89.1%	1.2%	2.9%	0.0%	0.0%	3.9%	3.0%
	Tract 135	71.4%	14.0%	2.8%	0.0%	0.0%	7.4%	4.4%
	Tract 136	90.6%	6.7%	0.0%	0.3%	0.0%	1.5%	0.9%
	Tract 137	81.0%	11.0%	1.8%	0.0%	0.0%	1.5%	4.7%
	Tract 138	90.3%	2.8%	0.0%	0.0%	0.0%	3.6%	3.3%
	Tract 139	68.1%	12.3%	4.2%	1.0%	0.0%	6.4%	8.0%
	Tract 140	61.4%	7.9%	18.7%	0.0%	0.0%	4.1%	7.9%
Tract 141	95.1%	0.3%	1.7%	0.0%	0.0%	1.1%	1.8%	
Tract 142	89.5%	0.7%	3.0%	0.0%	0.0%	1.7%	5.2%	

Source: Census 2000 and American Community Survey 2008-2012

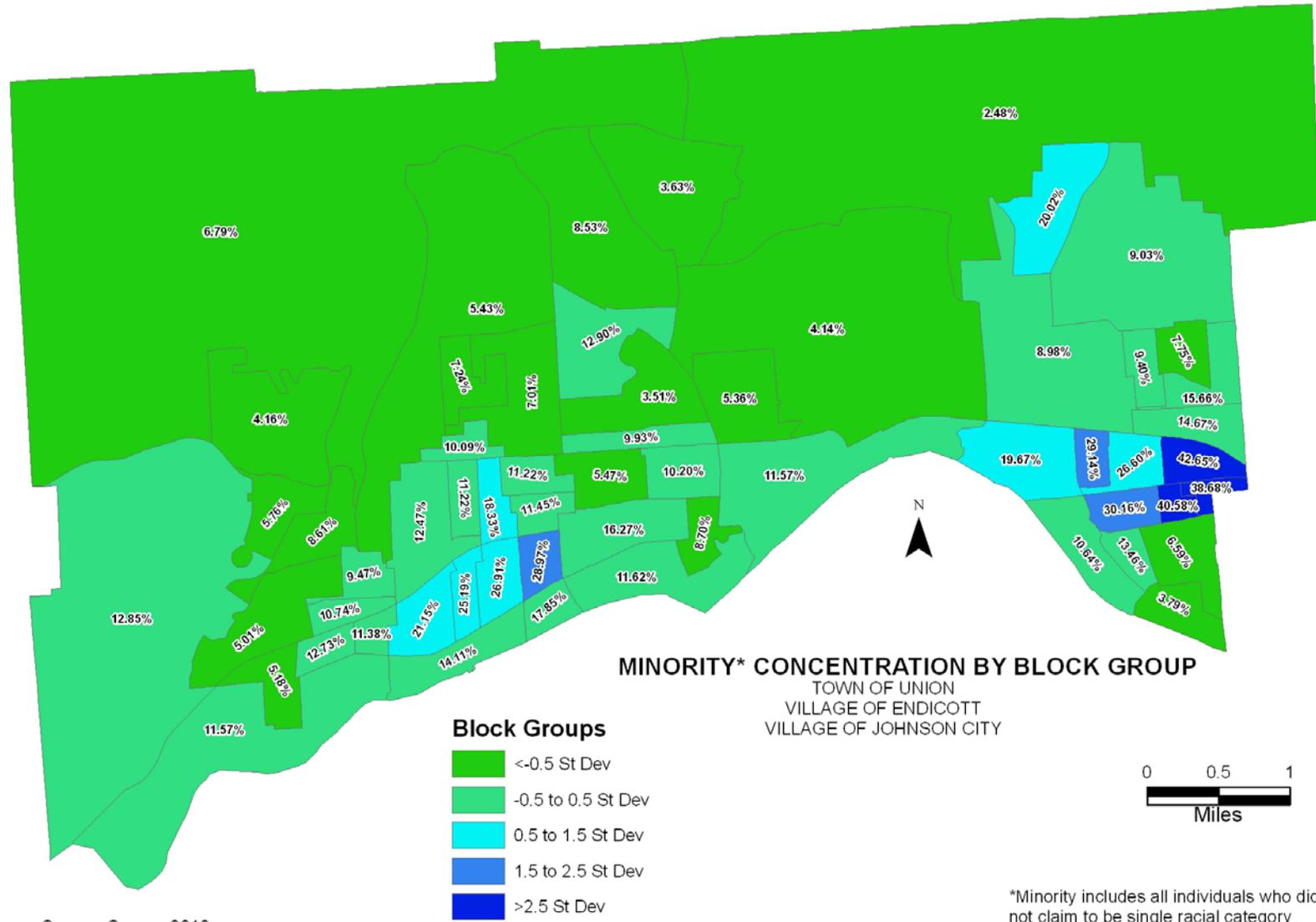
**MAP 1
MINORITY POPULATION CONCENTRATION
BY CENSUS TRACT**



Source: American Community Survey 2008-2012

*Minority includes all individuals who did not claim to be single racial category White and non-Hispanic/Latino.

**MAP 2
MINORITY POPULATION CONCENTRATION
BY CENSUS BLOCKGROUP**



Source: Census 2010

Income

The median family income in the Town was higher than the income for the County in both 2000 and in 2012 although the median household income was lower. The higher median income in the Town conceals the lower median income levels in the Villages. The median family income in the Town was 1.6% over the County's median family income in 2000 but decreased to just 0.9% of the County in 2012. The Villages of Endicott and Johnson City continued to have higher concentrations of lower-income people. In 2000 the median family income in Endicott was 78.9% compared to the County's median, and this dropped to 76.7% by 2012. In Johnson City, the median family income in 2000 was 86.4% of the County's, but this also fell to 82.6% by 2012. The percentage of families living below the poverty level increased for every area of the Town. The relative number of families living in poverty in the county overall also increased. The absolute numbers of families decreased from 2000 to 2012 for all areas of the Town and Broome County while the poverty rate increased indicating a higher percentage of more affluent families may have left the area.

**Table 3
Town of Union**

Income & Poverty 2000

Municipality	Median Family Income	Median Household Income	Total Families	Families Below Poverty Level
Town of Union	\$46,170	\$34,101	14,692	8.3%
Part - Town	n/a	n/a	7,923	4.1%
Endicott	\$35,858	\$26,032	3,081	15.4%
Johnson City	\$39,241	\$27,438	3,688	11.6%
Broome County	\$45,422	\$35,347	50,688	8.8%

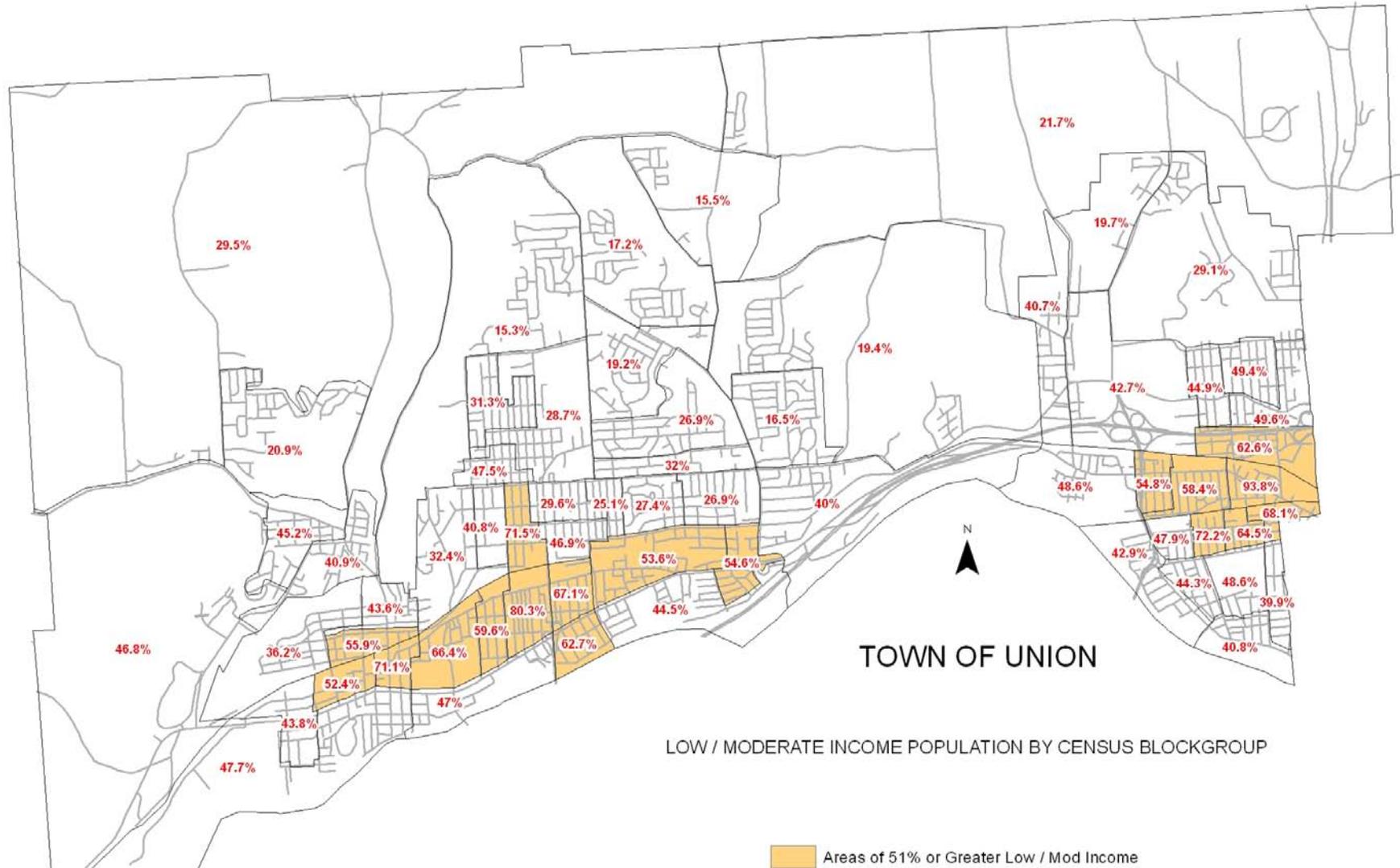
Source: U.S. Census Bureau 2000

Income & Poverty 2012

Municipality	Median Family Income	Median Household Income	Total Families	Families Below Poverty Level
Town of Union	\$59,826	\$45,527	14,010	10.1%
Part - Town	n/a	n/a	7646	5.8%
Endicott	\$45,467	\$33,734	2,926	17.0%
Johnson City	\$48,972	\$38,856	3,438	13.9%
Broome County	\$59,317	\$45,856	48,874	11.1%

Source American Community Survey 2008-2012

MAP 3 LOW/MODERATE INCOME POPULATION CONCENTRATIONS



Source: Census 2010 & HUD Income Data 2011

The Consolidated Plan has defined areas of low-income concentration as Block Groups having a majority of people with income less than 80% of the median income for the SMA. The Block Groups are designated as 'Target Areas' for the Community Development Block Grant Program.

Median family income, by Census Tract, ranged from a high of \$95,625 in CT 130 to a low of \$30,372 in CT 140. Median household income was similarly distributed. The areas with the lowest median incomes are generally located in the villages while the highest income areas are typically found in the Part-Town area. However, within all municipalities there are areas of both higher and lower income levels.

Table 4
Town of Union
Median Income by Census Tract 2012

Census Tract	Municipality	Median Family Income	Median Household Income
129	Part Town	\$66,875	\$43,100
130	Part Town	\$95,625	\$73,783
131	Part Town	\$48,125	\$39,241
132.01	Part Town	\$61,419	\$53,889
132.02	Part Town	\$71,339	\$53,309
133.01	Part Town	\$56,021	\$52,793
133.03	Part Town	\$80,351	\$59,231
133.04	Part Town	\$81,875	\$71,650
134	Endicott	\$50,625	\$38,716
135	Endicott	\$32,563	\$26,164
136	Endicott	\$45,536	\$34,444
137	Endicott	\$49,028	\$32,549
138	Johnson City	\$55,846	\$44,375
139	Johnson City	\$46,272	\$28,594
140	Johnson City	\$30,372	\$21,818
141	Johnson City	\$51,600	\$42,213
142	Johnson City	\$65,926	\$55,170

Source: American Community Survey 2008-2012

Income by Race/Ethnicity

There is a relationship between income and race/ethnicity in the Town of Union. Of the three main Town minorities (Black,

Asian, and Hispanic/Latino) all three have greater proportions of their respective populations at lower income levels than the Town as a whole. About half of the households in each of those minority groups have an income lower than 80% of MFI, whereas in comparison, two in five Non Hispanic/Latino White households have income lower than 80% of MFI. The Hispanic/Latino population seems to have relatively less families in the Extremely Low and Very Low income categories in comparison to the rest of the Town, but approximately two in five Hispanic/Latino households are in the Low Income category (50% to 80% MFI). The proportion of households with moderate-income or less is 41.4% for the Town. The proportion of the population at less than moderate income (80% MFI) for the White population is 40.1%, Blacks – 54.4%, Asians – 49.8%, and Hispanics/Latinos – 51.1%.

According to the 2008-2012 American Community Survey, the overall poverty rate for Town residents in 2012 was 14.7%. The poverty rate for the White, non-Hispanic/Latino population was 11.8%. The poverty rates for the Black (all ethnicity) and Amerindian (all ethnicity) populations are almost five times the White non-Hispanic/Latino population at 49.2% and 54.3% respectively. The Asian population poverty rates are almost three times the White, non-Hispanic/Latino population at 30.8% and the Hispanic/Latino (all races) population living in poverty was almost twice the White, non-Hispanic/Latino population at 22.6%. The number of people living at or below the poverty level has increased to about 8,062 individuals in recent years.

Table 5
Town of Union
Race/Ethnicity by Income

Race/Ethnicity	Extremely Low Income 0-30% MFI %	Very Low Income 31-50% MFI %	Low Income 51-80% MFI %	Moderate Income and Above >80 MFI %
White, non-Hispanic/Latino	9.9	11.7	18.5	59.9
Black, non-Hispanic/Latino	22.6	22.0	9.8	45.6
Asian, non-Hispanic/Latino	26.1	8.0	15.7	50.2
Hispanic/Latino Ethnicity (any race)	6.2	5.8	39.2	48.9
All	10.8	12.1	18.6	58.6

Source: U.S. Department of Housing and Urban Development, State of the Cities Data Systems:
Comprehensive Housing Affordability Strategy (CHAS) Data 2007-2011

Income by Age Distribution and Gender

According to the 2008 to 2012 American Community Survey, the proportion of people under 18 years of age living at less than the poverty level accounts for 4.8% of the Town's population but that same age group makes up 32.6 % of the population living under the poverty level. The proportion of the population aged 65 years and older living at or below the poverty rate is 1.6%, but this group makes up approximately 11.2% of the population living under poverty.

Married couple family households are the largest group of households comprising 40.0% of all households. Female-headed and male-headed family households represent 11.8% and 5.2% of the household demographic respectively. For families below the poverty level, 62.5% percent were female headed. Male headed families account for 10.4% of families below the poverty level and married couples account for the remaining 27.1%. From the entire household population, 3.6% are female headed families, 0.6% are male headed families, and 1.6% are married couples with income below the poverty level.

Owner-Occupants with Housing Problems

Overall, 19.5% of all households in owner-occupied housing have housing problems. Cost burden is the main housing problem across all income groups at 96.8% of all households with housing problems. Amongst various income levels, the cost burden varies. Over 75.8% of all home owning households at <30 AMI for the Town have a cost burden with more than half having a sever cost burden. This decreases to about 65.2% at 30 to 50% AMI, 35.2% at 50 to 80% AMI, and 6.8% at 80% AMI or higher income levels.

Table 6					
Town of Union					
Owner-Occupant Housing Problems by Income					
Income Levels (as percentage of Area Median Income)					
Housing Problems	<30	30 to 50	50 to 80	80+	All Incomes
No Housing Problems	9.9%	34.8%	64.2%	92.4%	79.8%
Unknown or Undetermined Problems	14.2%	0.0%	0.0%	0.0%	0.7%
Cost Burdened	19.1%	37.1%	24.8%	6.3%	12.1%
Severe Cost Burdened	56.7%	28.1%	10.4%	0.5%	6.7%
Overcrowded	0.0%	0.0%	0.0%	0.4%	0.3%
Severely Overcrowded	0.0%	0.0%	0.0%	0.2%	0.2%
Lacks Complete Plumbing/Kitchen Facilities	0.0%	0.0%	0.6%	0.1%	0.2%

Source: U.S. Department of Housing and Urban Development, State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (CHAS) Data 2007-2011

The elderly account for 35.5% of all owner-occupants, 39.0% of households with housing problems, and 40.9% of households with some type of cost burden. Elderly homeowners are disproportionately represented in the income groups having less than the AMI income for the area. Elderly home owners represent 58.9% of the total owner occupied households with income under 30% of AMI, 59.7% of the low-income owner occupied households (30%-50% AMI), and 61.1% of all moderate-income owner occupied households (50%-80% AMI).

The Town has operated the Home Improvement Program funded by CDBG funds for more than 30 years. A significant number of participants in the program are elderly, extremely low- and low-income owner-occupants. In addition to special housing rehabilitation needs that are related to the owner's physical condition, elderly homeowners' housing most often is in need of basic repairs and/or replacement to the major components of the house, such as the furnace, roofing, foundation, and electrical system. Without financial assistance, many of these elderly would be forced out of their homes or would remain in continually deteriorating physical settings.

Renter-Occupants with Housing Problems

Cost burden appears to be the main problem for renters; 44.7% of renters have housing problems, of which 86.6% of those problems are related to costs burdens. Extremely low-income (<30% AMI) renters account for 20.5% of all renters, low-income households (30-50% AMI) account for 19.8% of all renters, moderate-income renters (50-80% AMI) account for 22.7% of all renters, and households with higher income account for the remaining 37%.

The elderly account for 21.1% of all renters, but account for 25.1% of the renting households with housing problems. Elderly account for 22.6% of all moderate-income renting households, 24.7% of the low-income renters and 24.1% of extremely low-income renters. While 63.9% of all elderly renters have housing problems, 90.3% of the extremely low-income elderly renters and 67.4% of the low-income elderly renters have housing problems.

Table 7
Town of Union
Renter Housing Problems by Income

Income Levels (as percentage of Area Median Income)					
Housing Problems	<30	30 to 50	50 to 80	80+	All Incomes
No Housing Problems	5.2%	20.9%	58.5%	92.3%	52.7%
Unknown or Undetermined Problems	13.2%	0.0%	0.0%	0.0%	2.7%
Cost Burdened	8.0%	56.8%	27.5%	3.3%	20.3%
Severe Cost Burdened	62.7%	17.2%	8.4%	0.4%	18.3%
Overcrowded	2.8%	0.0%	2.3%	2.1%	1.9%
Severely Overcrowded	1.3%	2.7%	0.0%	0.9%	1.1%
Lacks Complete Plumbing/Kitchen Facilities	7.0%	2.4%	3.0%	1.3%	3.1%

Source: U.S. Department of Housing and Urban Development, State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (CHAS) Data 2007-2011

Housing Problems by Race/Ethnicity

Low/moderate-income minority renters account for 15.1% of all low/moderate-income renters. The income distributions of all renters compared to minority renters indicate that minority renters, except for Asian non Hispanic, Latino households, have a higher proportion of lower income households. Minorities in the Town as a whole have more roughly the same number of rental problems as the Town average. Except for Hispanic, Latino (all race) households, households with housing problems all have higher numbers of housing problems at the extremely low income level (<30% AMI) and/or very low income level (30-50% AMI) indicating housing costs are creating problems for those income categories. This is especially true for Asian households.

**Table 8
Town of Union
Income and Housing Problems By Race/Ethnicity
Renter Occupied Housing**

Income of Renters				
	% Income <30% AMI	% Income 30-50% AMI	% Income 50-80% AMI	% Income >80% AMI
All Racial/Ethnic Groups	20.5%	19.8%	22.7%	37.0%
All Minorities	28.7%	19.9%	19.9%	31.4%
Black, non-Hispanic/Latino	27.9%	25.3%	12.2%	34.6%
Asian, non-Hispanic/Latino	40.5%	7.0%	10.2%	42.3%
Hispanic/Latino Ethnicity (any race)	5.9%	9.4%	47.2%	37.4%
Renters with Housing Problems				
All Racial/Ethnic Groups	37.5%	35.1%	21.2%	6.3%
All Minorities	37.8%	34.6%	20.5%	7.1%
Black, non-Hispanic/Latino	30.0%	45.0%	10.0%	15.0%
Asian, non-Hispanic/Latino	71.4%	16.8%	3.4%	8.4%
Hispanic/Latino Ethnicity (any race)	13.8%	3.7%	82.6%	0.0%

Source: U.S. Department of Housing and Urban Development, State of the Cities Data
Systems: Comprehensive Housing Affordability Strategy (CHAS) Data 2007-2011

Low/moderate-income minority home owners account for 3.2% of all low/moderate-income home owners in the Town. The majority of home owners in the Town, including amongst minority households, are in the higher than moderate income range (80%+ AMI). Of households in this income category, only 7.6% are experiencing housing problems. For the Town as a whole, the relative amount of homeowners with housing problems is fairly evenly distributed across income brackets indicating that the level of income alone is not an indicative factor for housing problems. Every minority category, except for Hispanic/Latino homeowners, with owner occupied housing problems is predominantly in the upper income levels. A possible explanation is that the numbers are reflecting the mortgage financial crisis that occurred across the country in the past decade along with a higher than normal non-minority elderly population. Of all households with problems, most (91%) are related to cost burden issues. If homeowners are dealing with high interest mortgages or have purchased and are staying in homes that are relatively high in

monthly payments and/or maintenance of the property, then this would indicate higher income households having high cost burdens to stay in their homes. In other words, lower income households cannot afford to purchase a home (or have lost their homes in the meantime), but higher income households which could have purchased a home are now paying for homes they can barely afford for a variety of reasons. In addition, the high percentage of non-minority elderly in the Town, 96.7% of all individuals aged 65 or higher according to the 2008-2012 American Community Survey, and high number of elderly home owners, 31.8%, and the increased likelihood that elderly homeowners would no longer have a mortgage or would have a lower income, would skew the total number of homeowners with housing problems across the various income categories. The row on the table below showing all non-elderly homeowners with housing problems across all income categories shows this skew towards higher income households and comes closer to resembling the minority homeowners with problems distribution.

Table 9
Town of Union
Income and Housing Problems By Race/Ethnicity
Owner Occupied Housing

Income of Owners				
	% Income <30% AMI	% Income 30-50% AMI	% Income 50-80% AMI	% Income >80% AMI
All Racial/Ethnic Groups	4.7%	7.3%	16.0%	72.0%
All Minorities	1.6%	9.8%	19.7%	68.9%
Black, non-Hispanic/Latino	0.0%	7.4%	0.0%	92.6%
Asian, non-Hispanic/Latino	0.0%	9.7%	25.8%	64.5%
Hispanic/Latino Ethnicity (any race)	6.4%	1.7%	29.9%	62.0%
Owners with Housing Problems				
All Racial/Ethnic Groups	18.2%	24.4%	29.4%	28.0%
All Minorities	0.0%	22.4%	32.7%	44.9%
Non-Elderly, All Racial/Ethnic	13.9%	19.8%	25.3%	40.9%
Black, non-Hispanic/Latino	0.0%	16.7%	0.0%	83.3%
Asian, non-Hispanic/Latino	0.0%	33.3%	22.2%	44.4%
Hispanic/Latino Ethnicity (any race)	0.0%	0.0%	70.0%	30.0%

Source: U.S. Department of Housing and Urban Development, State of the Cities Data Systems: Comprehensive Housing Affordability Strategy (CHAS) Data 2007-2011

Economic Profile

The economy of the Town of Union is connected to the economy of the County and the region. According to the 2008-2012 American Community Survey, the largest employment sector is the educational, health care, and social assistance sector at 28.5% of employed Town residents which is likely related to the 35.3% of Town residents outside the labor force (e.g. children, retirees, and the disabled). The next largest two employment sectors are manufacturing and retail trade which combined account for 26.3% of employed individuals. Historically, the County's industrial capabilities and specializations are grouped into four categories: manufacture/assembly of personal computers and related equipment and parts, manufacture of simulators and related components, including software, consumer and industrial electronics/electrical machinery and equipment, including printed circuit boards and aerospace electronics. Many firms, large and small, are directly or indirectly dependent on the Department of Defense.

While there are a number of firms engaged in the manufacture of computers and/or related components, Endicott Interconnect, located at the former IBM facility in Endicott, is one of the largest local employers. For the past decade, IBM has been undergoing significant restructuring, the full effects of which have not yet been felt. The area also contains an agglomeration of firms engaged in the manufacture of flight simulators and aerospace products. These firms, including BAE (formerly Lockheed Martin) in Westover, have been hurt by the cutbacks in defense spending and corporate restructuring. After the damage from the September 2011 flooding of the Westover facilities, the company has moved to temporary accommodations within the Town.

Over the past few decades, the manufacturing sector of the local economy has reeled from plant closings, corporate restructuring and a lack of business. During the period from 1988-1992, five Broome County firms either ceased operations or moved to another state, resulting in the loss of 2,100 jobs. Endicott Johnson shed 1,300 workers and subsequently, following a merger of its boot manufacturing operations with another company, closed its local operations in 1992. MLI Corporation, Ozalid Corporation and Fair Play Caramels in Johnson City, ceased their local operations during the 1988-1992 period, resulting in the loss of 850 jobs.

The combined effects of recession and corporate restructuring have led to the dislocation of thousands of Broome County workers. The work force at IBM Endicott facility was cut by 9,000+ jobs. Dover Electronics, Universal Instruments, AAI Microflite and Ramp Industries, among others, collectively laid off approximately 1,000 workers due to lack of business. The cuts are expected to continue. The cutback in defense spending has had a serious impact on several prime contractors as well as subcontractors and suppliers.

According to the United States Bureau of Labor Statistics, the preliminary unemployment rate for April, 2014 for the Town is 5.8% which is slightly less than 6.1% for Broome County. According to the American Community Survey 2008-2012, nearly thirty six percent (36%) of individuals between the ages of 16 and 24 were unemployed. Minorities are disproportionately more likely to be unemployed with the Hispanic/Latino (any race) population reaching an unemployment rate of 20.1% while the Black (any

ethnicity) population had an unemployment rate of 16.6%. The Asian population (any ethnicity) unemployment rate (7.2%) is slightly lower than the White, non Hispanic/Latino rate of 7.6%. Individuals claiming some other race had the highest unemployment rate at 23.7%. Of those living below the poverty level, 27.7% were unemployed. The unemployment rates vary depending on educational attainment, from 14.7% for those without a high school or equivalent diploma to 3.3% for those with a four year or higher degree.

The impact on the housing market and conditions is enormous. Obviously, increased unemployment and decreased wages for the employed will create additional cost burden problems for the area and the need for various forms of assistance. Affordability then becomes of paramount importance.

One of the largest employers in the County, United Health Services, is located in the Town of Union. The other major employment concentrations are in the Town of Vestal (SUNY Binghamton and commercial development along Vestal Parkway), BAE (formerly in Westover now located in Endicott), Oakdale Mall (commercial area) in Johnson City, downtown Binghamton, Upper Front Street (commercial area) in the Town of Chenango and the Kirkwood and Conklin industrial parks. Most of the employment centers are centrally located and all major employment centers are accessible by public transportation services.

Employment and training services are concentrated in the urban portion of the County. The Broome County Office of Employment and Training, MBE/WBE Training Center and the NYS Department of Labor are located in downtown Binghamton. The main BOCES training facility is located in the Town of Dickinson and the BOCES adult training facility is located in central Endicott. Broome Community College is located on Upper Front Street in the Town of Dickinson. Workshop facilities for the disabled are located in downtown Binghamton and ACHIEVE (dba Broome-Tioga Association of Retarded Citizens) relocated their workshop facility to central Johnson City with the assistance of a CDBG funded Section 108 loan. The training facilities and service agencies are centrally located and are accessible by public transportation services.

Housing Units and Tenure

The number of housing units in the Town increased by 1097 units, or 4.2%, between 1990 and 2012. Despite the increase in the number of housing units, the proportion of the County's units located in the Town remained relatively the same at around 30% from 2000 to 2012.

Table 10
Housing Units 1990 - 2012
Town of Union

Municipality	1990	2000	2010	2012	1990 - 2010 Change	1990 - 2010 Change	2010 - 2012 Change
Town of Union	26,345	26,507	27,054	27,442	0.6%	2.06%	1.4%
Part - Town	11,906	12,170	12,892	12,981	2.2%	5.93%	0.7%
Endicott	6,669	6,686	6,719	6,881	0.3%	0.49%	2.4%
Johnson City	7,770	7,651	7,443	7,580	-1.5%	-2.72%	1.8%
Broome County	87,969	88,817	90,563	90,357	1.0%	1.97%	-0.2%

Source: American Community Survey 2008-2012

Although the number of owner-occupied housing units has steadily increased since 1960, the proportion of owner-occupancy has slightly decreased. In 1960, there were 13,024 owner-occupied units; or 66.1% of occupied units. By 2012, the number of owner-occupied units has increased to 15,084, but the proportion of owner-occupied units had decreased to 61.3% of occupied units.

The tenure pattern in the Part-Town reflects the continued predominance of single-family detached housing. The tenure patterns in the Villages are different from the Part-Town. In the Village of Endicott, 1960 was the last period in which the proportion of owner-occupied units was higher than renter-occupied units. In 1960, 51.1% of the units were owner-occupied. The number and the proportion of owner-occupied units declined to the current proportion of 37.8% owner-occupied. Johnson City still maintains more owner occupied then renter occupied units: 47.8% to 37.0% respectively. However, both villages have in excess of a 13% overall vacancy rate for their housing units.

Table 11
Town of Union
Housing Tenure/Vacancy 2012

Municipality	Owner Occupied	Renter Occupied	Vacant Housing Units	Rental Vacancy Rate	Homeowner Vacancy Rate
Town of Union	55.0%	34.6%	10.4%	6.4%	2.3%
Part - Town	68.3%	25.7%	6.0%	x	x
Endicott	37.8%	48.8%	13.5%	6.4%	3.9%
Johnson City	47.8%	37.0%	15.1%	9.5%	2.4%
Broome County	58.9%	29.9%	11.2%	6.7%	2.1%

Source: American Community Survey 2008-2012

The structure age of the majority of the units in the Villages often precludes their continuance as single-family dwellings, due to their inability to retain and capture the home buying public.

A high degree of homeownership is the more desirable tenure pattern, since ownership implies a more stable community. A high proportion of renter-occupied units can result in increased blight due to possible increases in absentee ownership and the focus of the dwelling structures on land speculation instead of residential maintenance.

Assisted and Group Housing

Assisted and group housing units are scattered throughout the Town of Union. Assisted housing in the Town of Union is provided as follows:

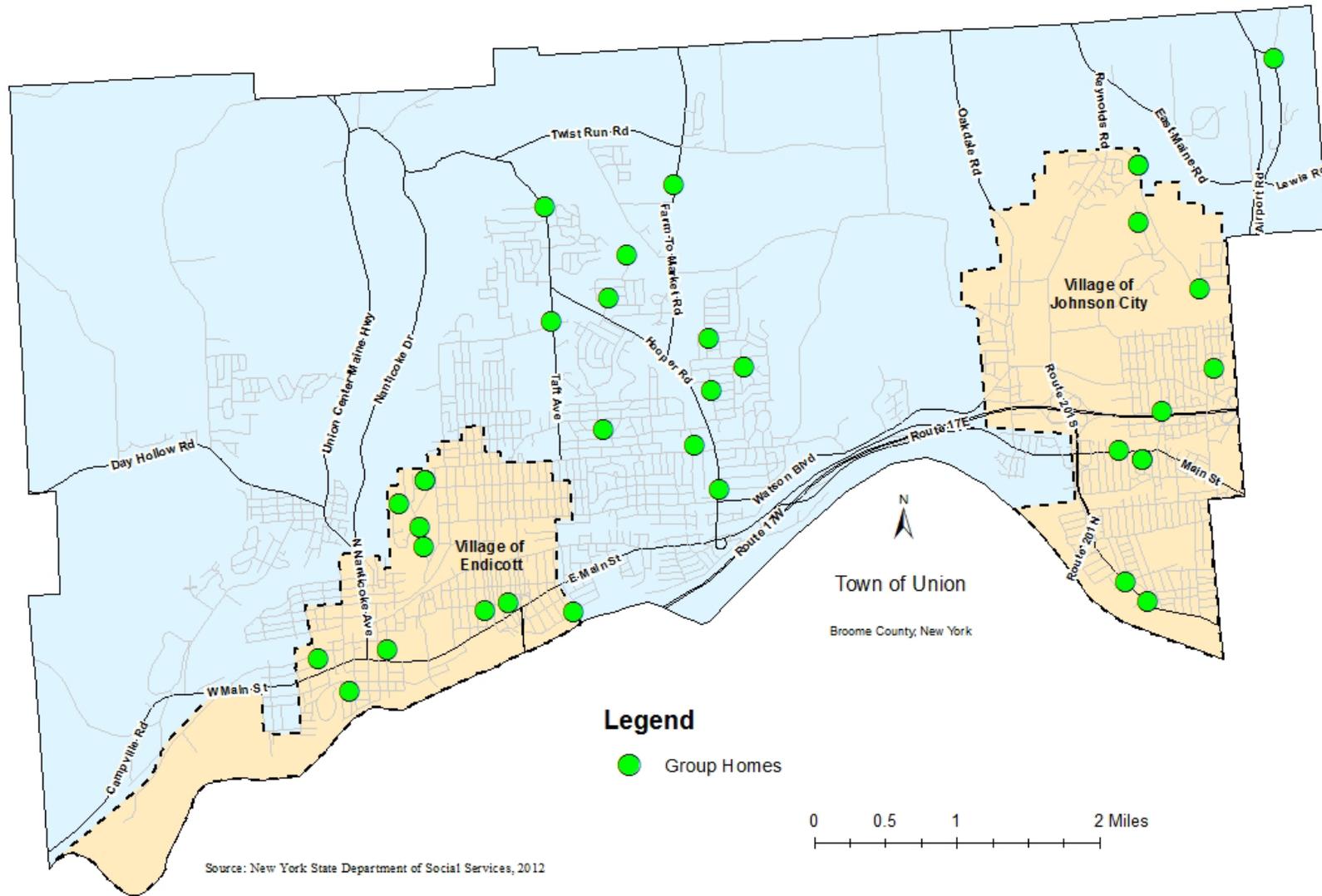
**Table 12
Town of Union
Assisted Living and Group Homes, 2014**

Name	Address	Capacity	Type
Endicott Nursing Home and Health Related Facility	301 Nantucket Dr, Endicott	100	Comb Nursing Home & Health Related
James G Johnston Memorial Nursing Home	285 Deyo Hill Rd, Johnson City	80	Comb Nursing Home & Health Related
Susquehanna Nursing Home & Health Related Facility	282 Riverside Dr, Johnson City	160	Comb Nursing Home & Health Related
Bridgeway	9 Cenacle Plz, Johnson City	12	Comm Residence/Supervised Living
Madison House	210 Madison Ave, Endicott	14	Comm Residence/Supervised Living
Ideal Senior Living Center	601 High Ave, Endicott	150	Health Related Facility
Sullivan Park Health Care Center Inc	301 Nantucket Dr, Endicott	20	Health Related Facility
United Health Services CS Wilson Memorial Hospital	33-57 Harrison Ave, Johnson City	422	Hospital Based SNF
100 Virginia Avenue IRA	100 Virginia Ave, Johnson City	2	Individual Residential Alternative
1019 Taft Avenue IRA	1019 Taft Ave, Endicott	8	Individual Residential Alternative
109 Skye Island Drive IRA	109 Skye Island Dr, Endicott	4	Individual Residential Alternative
1198 Taft Avenue IRA	1198 Taft Ave, Endicott	12	Individual Residential Alternative
1406 Broad Street IRA	1406 Broad ST, Endicott	12	Individual Residential Alternative
1401 Stella Ireland IRA	1401 Middle Stella Ireland Rd, Binghamton	8	Individual Residential Alternative
1441 Farm-to-Market Road IRA	1441 Farm-to-Market Rd, Endwell	14	Individual Residential Alternative
2003 Riverview Drive IRA	2003 Riverview Dr, Endicott	6	Individual Residential Alternative

Town Of Union Analysis of Impediments To Fair Housing

209 South Loder Avenue IRA	209 South Loder Ave, Endicott	12	Individual Residential Alternative
21 Carlton Street IRA	21 Carlton St, Johnson City	14	Individual Residential Alternative
2724 Hamilton Drive IRA	2724 Hamilton Dr, Endwell	6	Individual Residential Alternative
2916 Ricky Drive IRA	2916 Ricky Dr, Endwell	4	Individual Residential Alternative
33-37 Rose Lane IRA	33-37 Rose Ln, Johnson City	6	Individual Residential Alternative
3600 Hoover Ave IRA	3600 Hoover Ave, Endwell	6	Individual Residential Alternative
3601 Scribner Drive IRA	3601 Scribner Dr, Endwell	6	Individual Residential Alternative
3601 Wildwood Drive IRA	3601 Wildwood Dr, Endwell	4	Individual Residential Alternative
3714 Maplehurst Drive IRA	3714 Maplehurst Dr, Endwell	4	Individual Residential Alternative
414 Firth Street IRA	414 Firth St, Endicott	4	Individual Residential Alternative
415 Main Street IRA	415 Main St, Johnson City	6	Individual Residential Alternative
506 Patterson Court IRA	506 Patterson Ct, Endwell	4	Individual Residential Alternative
6 Greenwood Circle IRA	6 Greenwood Cir, Endwell	4	Individual Residential Alternative
68 Gouverneurs Lane IRA	68 Gouverneurs Ln, Endicott	8	Individual Residential Alternative
95 Skye Island Drive IRA	95 Sky Island Dr, Endicott	6	Individual Residential Alternative
Deyo Hill Rd CR-IRA	67 Deyo Hill Rd, Johnson City	6	Individual Residential Alternative
United Health Services Wilson IP Unit	33-57 Harrison St, Johnson City	52	Psychiatric Center
Hilltop Manor West	285 Deyo Hill Rd, Johnson City	98	Not-for-Profit Home for Adults
Sullivan Park Health Care Center Inc	301 Nantucket Dr, Endicott	160	Nursing Home
Wilson Hospital SNF	33-57 Harrison Ave, Johnson City	100	Nursing Home

**MAP 4
GROUP HOMES AND ASSISTED LIVING IN UNION 2012**



The newer group homes facilities: Farm-to-Market Road Center, Taft Avenue Center, Scribner Drive Center and Deyo Hill Center are located in the more suburban portions of the Town in prime single family housing areas. Other group home facilities are located in scattered locations in Broome County.

EVALUATION OF CURRENT FAIR HOUSING LEGAL STATUS

Each year the Town of Union runs public service announcements that the Town should be contacted if there is a complaint of housing discrimination.

The Office of Fair Housing and Equal Opportunity reported twenty-six housing discrimination complaints in Broome County from 2010 to 2012. These complaints are summarized in Tables 13a and 13b. For Table 13a, fractional numbers indicate that individual complaints spanned more than one category, e.g. a complaint for reasons of Race Basis *and* Disability Basis would count as .5 and .5 cases respectively for each category but the case itself would count as one full complaint.

Three out of five weighted housing complaints were based on disability. The next highest weighted category of complaints was complaints based on Race. Table 13b shows that the two largest racial categories for complaints (non-weighted) were Black (42.9%) and white (28.6%).

**Tables 13a and 13b
Housing Complaints 2010 to 2012**

13a: Housing Complaints by Year and Category (weighted)

Year	Race Basis	Color Basis	National Origin Basis - Hispanic	National Origin Basis - Non-Hispanic	Disability Basis	Familial Status Basis	Religion Basis	Sex Basis	Retaliation Basis	Total
2010	1.2	1.7	0	0	6.4	0.3	0	0.3	0.3	10
2011	1.5	0.2	0.2	0.0	5.7	0.2	0	1.0	0	9
2012	0.7	0.2	0	0.7	3.5	0.3	0.2	1.0	0.5	7
Total by Category (weighted)	3.3	2.0	0.2	0.7	15.6	0.8	0.2	2.3	0.8	26
Percentage of Total	12.8%	7.8%	0.8%	2.7%	60.1%	3.0%	0.6%	8.7%	2.9%	

13b: Race Basis Housing Complaints by Racial Category (non-weighted)

	Race Basis - Asian	Race Basis - Asian and White	Race Basis - Black or African American	Race Basis - Black and White	Race Basis - Hawaiian or Pacific Islander	Race Basis - Native American	Race Basis - Native American and Black	Race Basis - Native American and White	Race Basis - White	Race Basis - Other Multi-Racial	Total By Year
2010	0	0	2	0	0	0	0	0	1	0	3
2011	0	0	1	0	0	0	0	0	0	1	2
2012	1	0	0	0	0	0	0	0	1	0	2
Total by Category	1	0	3	0	0	0	0	0	2	1	7
Percentage of Total	14.3%	0.0%	42.9%	0.0%	0.0%	0.0%	0.0%	0.0%	28.6%	14.3%	

IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediments to fair housing choice can be emplaced by the public sector and by the private sector through overt actions, covert actions and inaction. Public policies, ordinances and administrative actions can narrow housing choice. Private sector actions through financing services, real estate transactions and leasing policies can similarly narrow choice.

Public Sector

Public sector activities that will be reviewed include: building, occupancy, health and safety codes, policies and administrative actions effecting site plan approval, infrastructure requirements and development, real property tax assessments, zoning, demolition and displacement decisions, community development and housing activities and resource restrictions, interdepartmental coordination, planning, financing and actions related to siting public transportation and supportive social services, Section 8 Rental Assistance administration and policies and practices effecting appointments to community boards.

The Town of Union and the Villages of Endicott and Johnson City each are responsible for policies, implementation and regulations within their respective municipalities although they do share a Unified Zoning Code.

Local Building and Other Codes

The Town of Union, Village of Endicott, and Village of Johnson City have adopted and use the New York State Building Code, Housing Maintenance Code, and Fire Prevention Code. The codes do not require existing buildings be made accessible to the disabled. When alterations or additions to existing buildings exceed 50% of the replacement cost of the building within a six months period, the modification must be designed in such a manner as to allow future adaptation to meet the needs of the disabled.

In addition to the above codes, the Village of Endicott has a Housing Code and regulations controlling alterations within the designated Historic District. Since the Historic District designation is based on an area designation, rather than on individual buildings, the design standards allow modifications to retrofit existing buildings to meet the needs of the disabled.

Public Policies and Actions Affecting Approval of Sites and Building Requirements

The Town of Union and the two Villages consider a group home, by definition, to be included in the definition of a single family house, and as such are permitted in all areas of the respective municipalities where conventional single family housing is permitted. The minimum lot size requirements for single family housing ranges from a minimum lot size of 4,000 square feet to 40,000, depending upon the availability of public water and sewer and upon the existing development patterns. Single family detached, mobile homes, single family semidetached, single family attached, two-family, and multifamily housing units are permitted in all three jurisdictions.

The Villages of Endicott and Johnson City are served entirely by public water and sanitary sewer systems. A majority of the Town of Union is similarly served by both public utilities, with water and sewer services provided by Johnson City in the eastern third of the Town and by Endicott in the western two-thirds. Only the extreme northwesterly and northeasterly portions of the Town are unserved by public utilities. The Town of Union permits residential development in areas that are unserved by public utilities, provided the lot size is adequate to provide a safe water and sewage system. All other utilities are available throughout the Town and Villages. In all three municipalities, it is the responsibility of the developer to extend utilities and roads into vacant land. When the infrastructure is built according to the subdivision regulations, the streets and utilities are accepted by the respective municipality as publicly owned.

Public hearings are advertised with a statement that people having special needs because of their disability should contact the respective municipality to ensure that their needs are addressed and to ensure that they can fully participate in the hearing. All three municipal buildings have been remodeled to make them accessible to the disabled.

Real estate assessments are a Town-wide function administered by the Town Assessor. Existing buildings and new construction are assessed at a portion of their market value. Housing units retrofitted for the disabled are not assessed higher than a standard housing unit, either at the time of construction or remodeling. The Town operates property tax abatement programs for low-income elderly homeowners, veteran homeowners, and improvements in the Empire Zones.

The three municipalities offer road maintenance, snow removal, street lighting, and garbage collection on an equal basis throughout the Town. Parks and recreation programs are similarly scattered throughout the Town with additional summer recreational programs operated in school buildings.

The Town of Union's displacement policy is to not take any action that will displace people, except on a voluntary basis either through its efforts in rehabilitating existing housing, mortgage assistance and in the removal of houses from the flood plain. Private commercialization projects, for the most part, occur on vacant land or land that is sparsely developed.

Community Development Block Grant Activities

Community Development Block Grant funded housing rehabilitation and mortgage assistance programs are operated on a Town-wide basis and thereby promote the widest choice of housing selection. There are no public policies that serve to restrict the resources to select areas of minority concentration nor that inhibit the employment of minority persons and individuals with disabilities. The policies of the Town of Union are coordinated with other local agencies to widen housing choice.

None of the CDBG funded activities involve displacement nor are there any proposed demolitions of subsidized housing. Property tax increases are municipality-wide, when they occur, the amount based on the millage rate applied to the property assessment.

Broome County Transit provides public bus service throughout the urban portions of the County and to the employment centers located at the periphery of the urban areas. Most of the Villages of Endicott and Johnson City and the southerly portion of the Part-Town are accessible to the public bus system. Three of the buses on the regular bus system have wheelchair lifts. BC Transit also operates public BC Lift. BC Lift provides curb-to-curb service within the urbanized area for passengers that are certified as disabled. The cost of the service is the same as the normal BC Transit fare. The availability of the BC Lift service makes supportive social services as well as employment opportunities available throughout the Town, with the exception of the more rural northerly portion of the Town.

Section 8 Rental Assistance

The distribution of participants in the Section 8 Housing Choice Voucher program administered by the Town of Union is shown on Map 5.

The local preference ranking system used by the Town of Union to prioritize people going from the waiting list to the program gives preference to people who live and/or work in the Town of Union. The equivalent priority for the disabled and elderly assures that the program is not biased against these populations.

SEPP operates four senior housing developments in the Town of Union, Marian Apartments in Endwell, Wells Apartments and Harry L. Apartments in Johnson City, and Nichols Notch in Endicott. The four buildings have a full occupancy of 239 (Marian Apartments - 102 units and Wells Apartments - 50 units, Harry L Apartments 40 units, and Nichols Notch 37 units). The Nichols Notch and Harry L facilities were partially funded through the Town's CDBG program.

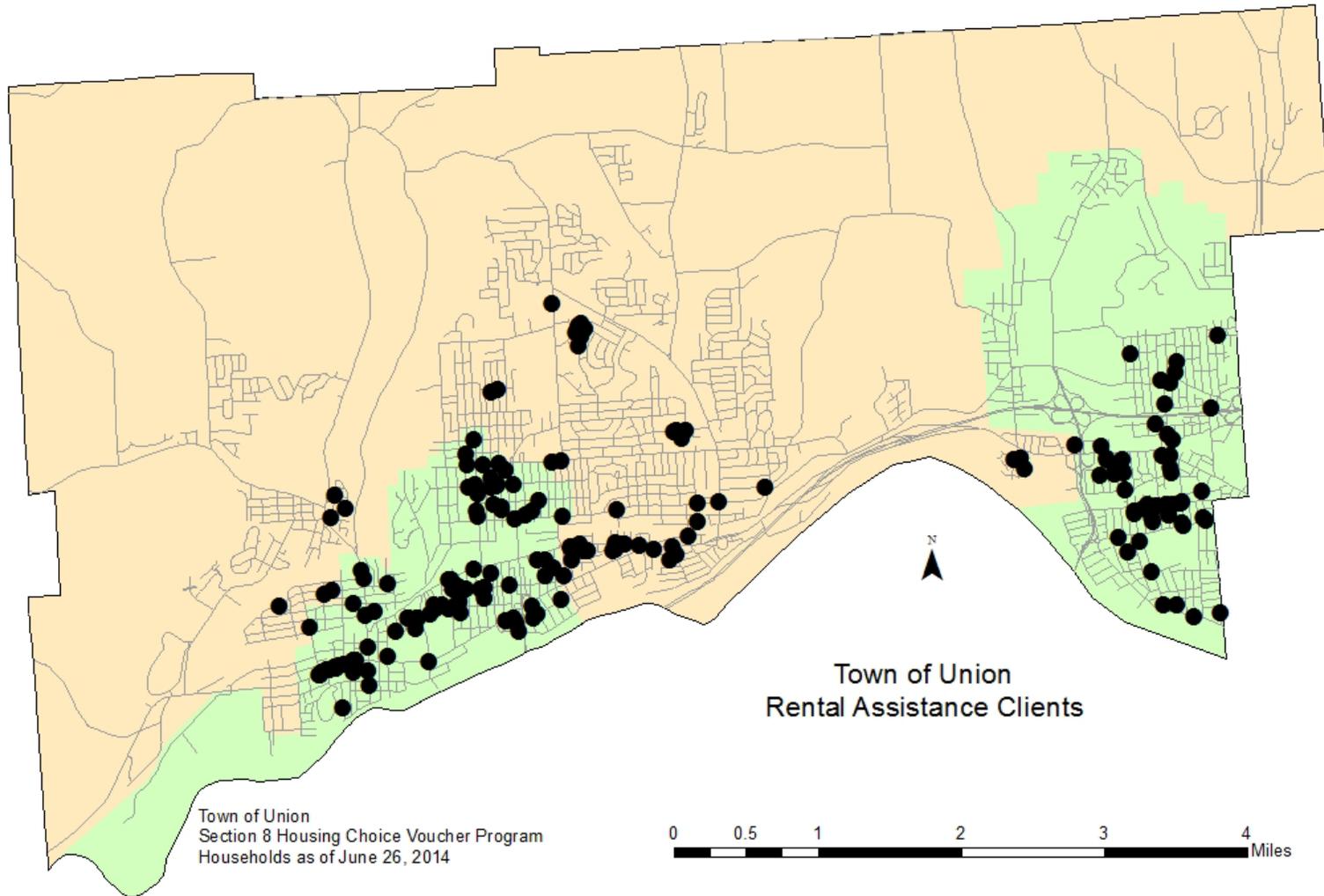
Board Representation

Membership on the various Planning and Zoning Boards is open to all racial, ethnic, religious and disabled segments of the community. Although there are currently no minority or disabled members on the Planning Board or Zoning Boards, there has been minority representation in the recent past. Since the municipal buildings are all handicapped accessible, the physical presence of the building would not prevent disabled people from being board members or participating at public meetings. However, several Board Members are elderly, and thus this segment of the community is represented.

Private Sector

Private sector activities reviewed include: real estate practices for sale and rental of housing, banking policies pertaining to financing housing, housing brokerage services and availability of information on financial assistance to the disabled.

**MAP 5
RENTAL ASSISTANCE CLIENTS 2014**



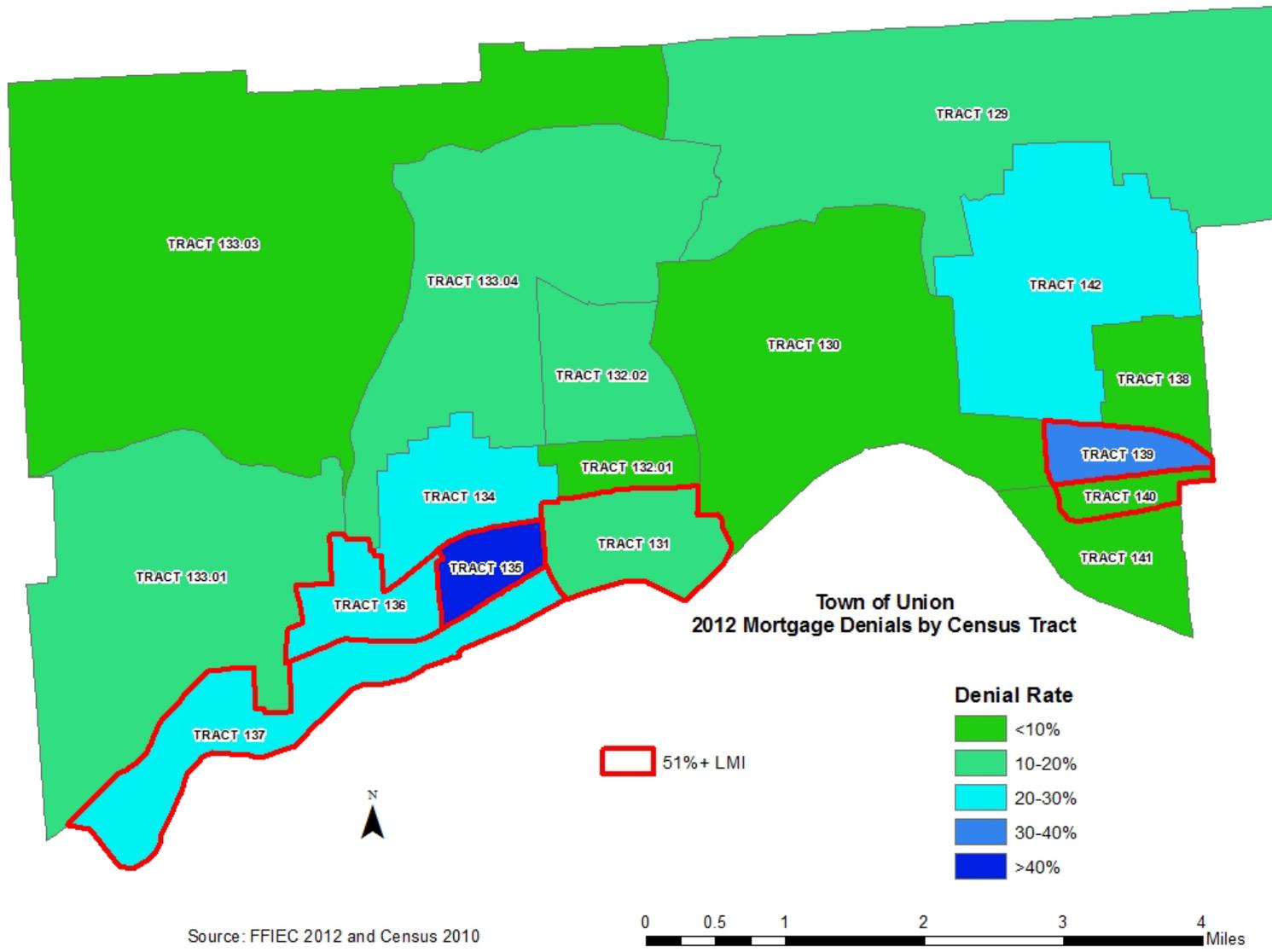
Real Estate Practices for Sale and Rental Housing

There does not appear to be any sale or rental of housing and real estate practices that limit fair housing choice. Such practices as steering or blockbusting, deed restrictions, trust or lease provisions, conversions of apartment to all-adult units, inaccessible design or property management firm's occupancy quotas are not applicable to the area.

Banking Policies and Practices

The disposition of conventional home-purchase loans by race/ethnicity, gender and income were analyzed for the entire MSA. Home Mortgage Disclosure Act data for 2012 was analyzed to determine if loaning practices have limited housing choice. Maps 6 and 7 show that Census Tracts with minority and low-income concentrations do not always have the highest percentage of home purchase loan denials.

**MAP 6
HOME PURCHASE LOAN DENIALS AND
LOW INCOME POPULATION CONCENTRATIONS 2012**



Census Tract 135 in the Village of Endicott experienced a mortgage denial rate of 85.7%. Tract 139 in the Village of Johnson City had a denial rate of 37.5%. Tracts 134, 136, and 137 in Endicott and Tract 142 had denial rates in the twenties. Most Census Tracts had denial rates less than 20%. Tract 140 in Johnson City had no denials and also has a high LMI percentage and minority concentration; although only nine loans were originated, none were denied. The denial rates typically were highest and lowest in the villages compared to the surrounding Part Town area, indicating a bimodal distribution of denials. Each Census Tract in the Village of Endicott had a relatively high mortgage denial rate.

**MAP 9
HOME PURCHASE LOAN DENIALS AND
MINORITY POPULATION CONCENTRATIONS 2012**

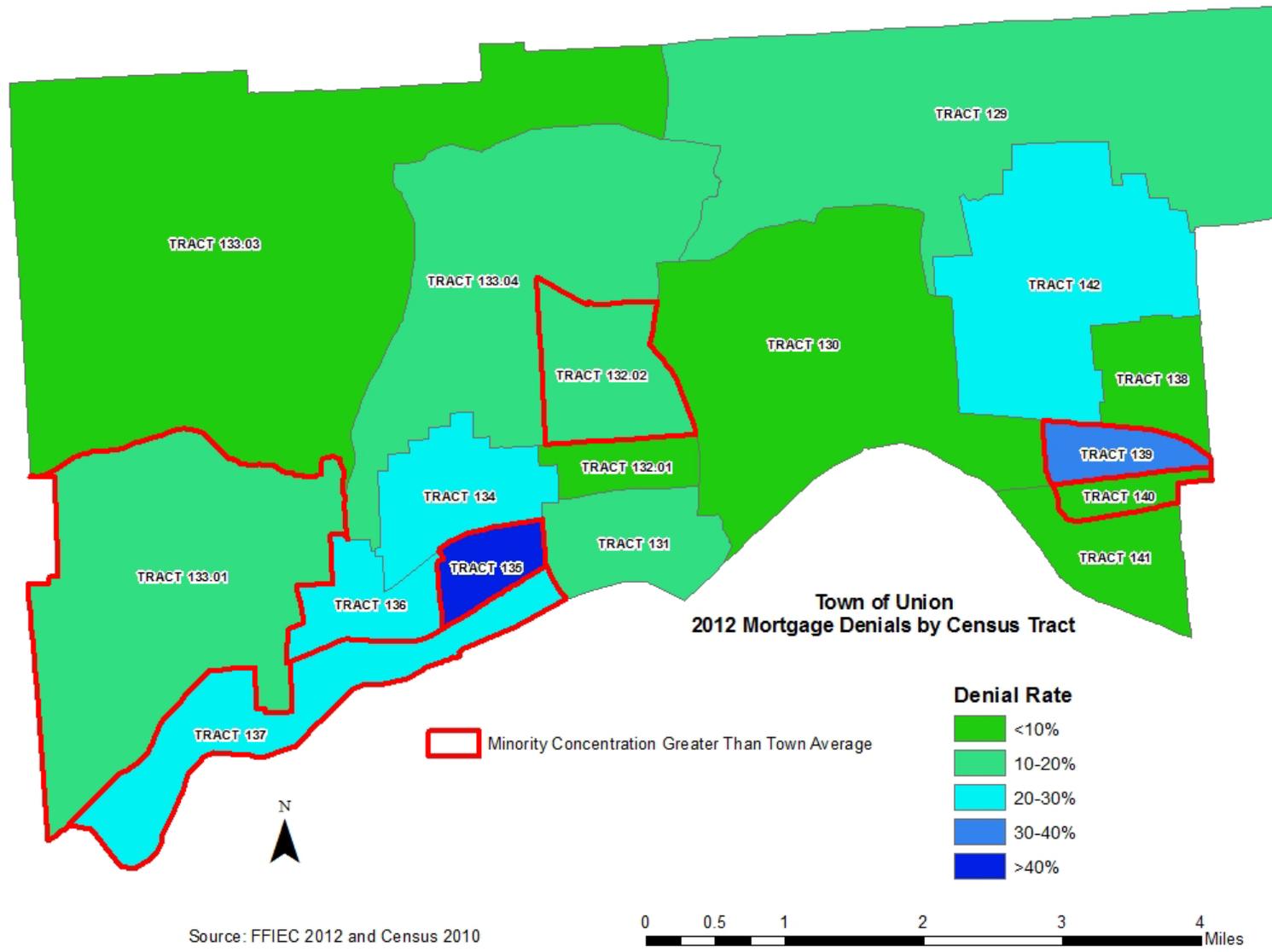


TABLE 14: Conventional Home Purchase Loans by Race and Income 2012

	Applicati ons Received	Loans Originated	% of Loans Originated	Applications Denied	% of Applications Denied
Asian	29	18	62%	4	14%
Black or African American	16	9	56%	3	19%
Native Hawaiian/Pacific Islander	0	0	n/a	0	n/a
White	1105	754	68%	157	14%
Joint (White/Minority Race)	10	7	70%	3	30%
Race Not Available	80	40	50%	18	23%
Hispanic or Latino	9	6	67%	0	0%
Not Hispanic or Latino	1112	773	70%	145	13%
White Non-Hispanic	1058	740	70%	136	13%
Minority (all)	69	45	65%	10	14%
Less than 50% of MSA Median	125	47	38%	56	45%
50-79% of MSA Median	276	165	60%	47	17%
80-99% of MSA Median	161	117	73%	18	11%
100-119% of MSA Median	149	102	68%	23	15%
120% or More of MSA Median	496	377	76%	34	7%
Income Not Available	33	20	61%	7	21%

Source: FFIEC 2012 Data

The loan origination rate was almost the same for minority households as it was for white, non-Hispanic/Latino households. Sixty-five percent of loans were originated for race and ethnic minority households and seventy percent of loans were originated for white non-Hispanic/Latino households. Over two-thirds (67%) of the loans for Hispanic/Latino households, while 56% of the loans for Black households were originated. Sixty-two percent of the loans were originated for Asian households.

The loan origination rate was lowest for the lowest income bracket at 38% for those making less than half of the average income for the surrounding area while the loan origination rate was highest for the highest income bracket at 76% for those making a fifth

or more over the regional median income. There is a general inverse relationship between loan denial and income as well as a direct relationship between loan origination and income. However, households with income in excess of 80% of the MSA median, yet still below the median itself, have a higher origination rate and lower denial rate than those in the next highest income bracket.

Housing Brokerage Services

There are no reports of discriminatory practices by the housing brokerage agencies.

Program Information Dissemination

The Town of Union has a home improvement program that provides financial assistance for modifications to housing units to make them accessible to persons with disabilities and their families. The Town has distributed information on the housing programs to the various agencies working with the disabled population.

The Town of Union developed its First Time Home Buyer (FTHB) program cooperatively with agencies working with the disabled population, such as STIC, Catholic Charities, Broome Developmental Center, and ACHIEVE. Information on the program was distributed to these agencies before the program was announced to the general public. The agencies were requested to send referrals for assistance to purchase a house.

Public and Private Sector

The Town of Union continues to publicize the importance of fair housing in public service announcements, its advertisements and in flyers used as part of the Section 8 briefing package. The Town of Union and the Villages of Endicott and Johnson City have taken positive steps to foster access for the disabled by extensive remodeling of public buildings and through the provision of services for people with hearing and vision disabilities.

The three school districts have active programs promoting ethnic and racial diversity and understanding of cultural diversity. The Johnson City School District, in particular, has school and after school activities to encourage the understanding of racial and ethnic differences and has taken steps to promote minority participation in the school and in the community. The Village and the School District of Johnson City have responded to the large number of refugee families that have settled in the Village by spearheading the establishment of the Family Resource Center and its emphasis on assistance to refugee families and other low-income families within the central portion of the Village.

RESPONSIVE ACTIONS

An analysis of census information, discrimination complaints, HMDA reports, and the response from the public and contacted agencies did not raise any issues concerning barriers to fair housing choice. No responsive actions are included in the AI. The Town of Union in designing and administering its various housing programs and other administrative functions has taken steps to ensure that they do not impact housing choice in a negative manner.

The Home Improvement Program for owner occupied units is administered on a Town-wide basis. This ensures that equal access to the programs is provided. The First Time Home Buyer program was initially tied to the CDBG target areas to promote homeownership opportunities in the older neighborhoods to encourage their stability. The program was altered to make it Town-wide. This change in the program allows a wider choice of location as well as housing style and age. Even in its targeted stage, the program allowed disabled families to seek housing outside the CDBG target areas to allow suitable choice.

The Town of Union's Section 8 Housing Choice Voucher program is similarly administered on a Town-wide basis and includes as the service delivery area the Towns of Union and Vestal. Movement between the two municipalities and within the municipalities allow choice of housing from urban to rural settings and allows ample selection near to employment centers, shopping, public transportation, social services, educational facilities, and health facilities. The Town of Union and the City of Binghamton have an agreement that allows Section 8 participants to move between the two service delivery areas without it being considered a portability move. The assisted clients are served by the respective HA where they were initially certified. The Town of Union's Administrative Plan does not count other agency's subsidies when determining preferences. This was included in the Administrative Plan at the request of service agencies working with the disabled population, notably Catholic Charities, to allow their clients to move into the community from supportive housing situations.

The Town of Union and the City of Binghamton were successful in having portions of the respective municipalities approved as a joint Empire Zone by New York State in 1994, the Triple Cities Empire Zone. The Empire Zone looks at furthering job opportunities through incentives to businesses to locate and to expand within the zone. It also looks at providing the necessary services to the residents of the zone to be able to take advantage of the job opportunities created within the zone. Job training, childcare, social services and housing opportunities will be fostered in conjunction with the economic redevelopment and reuse of properties within the Zone.

Lastly, the Town has been seeking to coordinate rental rehabilitation projects with social service providers to provide management of buildings that are rehabilitated. The management would assure that the buildings are maintained over time and the needs of the residents are met to assist them in maintaining their independence.

TABLE 15: Income and Minority Data by Census Tract 2012

Tract	Tract Household Income Level	Tract Median Household Income %	2014 HUD Est. MSA/MD non-MSA/MD Median Family Income	2012 Tract Median Family Income	Tract Population 2012	Tract Minority %	Minority Population 2012	Owner Occupied Units 2012	1- to 4-Family Units 2012
129	Upper	124	\$62,900	\$66,875	1,123	0.0%	0	370	474
130	Upper	153	\$62,900	\$95,625	4,452	8.3%	371	1,561	1,931
131	Middle	86	\$62,900	\$48,125	2,399	11.9%	285	594	1,085
132.01	Middle	84	\$62,900	\$61,419	2,132	6.9%	148	886	1,009
132.02	Upper	131	\$62,900	\$71,339	3,350	13.3%	446	987	1,472
133.01	Middle	100	\$62,900	\$56,021	5,057	13.1%	662	1,513	1,899
133.03	Upper	131	\$62,900	\$80,351	3,011	3.6%	108	977	1,097
133.04	Upper	134	\$62,900	\$81,875	6,134	6.1%	373	1,972	2,443
134	Middle	90	\$62,900	\$50,625	4,012	10.9%	439	1,082	1,980
135	Low-Mod	57	\$62,900	\$32,563	1,945	28.6%	557	200	806
136	Low-Mod	64	\$62,900	\$45,536	3,820	9.4%	360	755	1,599
137	Low-Mod	64	\$62,900	\$49,028	3,535	19.0%	673	561	1,128
138	Middle	89	\$62,900	\$55,846	3,436	9.7%	333	967	1,505
139	Low-Mod	44	\$62,900	\$46,272	2,505	31.9%	799	323	960
140	Low-Mod	60	\$62,900	\$30,372	2,974	38.6%	1,148	496	1,207
141	Middle	91	\$62,900	\$61,019	3,284	4.9%	160	963	1,507
142	Middle	107	\$62,900	\$65,926	2,933	10.5%	309	877	1,073

Source: FFIEC 2012, American Community Survey 2008 to 2012

TABLE 16: Housing by Census Tract 2012

Tract	Total Housing Units 2012	1- to 4- Family Units 2012	Median House Age (2012 Data for Year 2014)	Inside Principal City?	Owner Occupied Units 2012	Vacant Units 2012	Owner Occupied 1- to 4- Family Units 2012	Renter Occupied Units 2012
129	643	474	38	No	370	29	370	244
130	1962	1,931	57	No	1,561	85	1556	316
131	1410	1,085	66	No	594	133	594	683
132.01	1028	1,009	61	No	886	54	886	88
132.02	1672	1,472	49	No	987	185	974	500
133.01	2554	1,899	57	No	1,513	150	1480	891
133.03	1172	1,097	51	No	977	66	969	129
133.04	2540	2,443	37	No	1,972	77	1958	491
134	2142	1,980	70	No	1,082	371	1082	689
135	1072	806	75+	No	200	176	200	696
136	1961	1,599	75+	No	755	195	755	1011
137	1706	1,128	67	No	561	184	534	961
138	1638	1,505	64	No	967	203	955	468
139	1338	960	75+	No	323	272	323	743
140	1570	1,207	75+	No	496	364	496	710
141	1574	1,507	73	No	963	196	963	415
142	1460	1,073	43	No	877	111	877	472

Source: FFIEC 2012, American Community Survey 2008 to 2012

TABLE 17: Income by Census Tract 20102

Tract Code	Tract Household Income Level	2014 HUD Est. MSA/MD non-MSA/MD Median Family Income	% Population Below Poverty Line 2012	2010 Tract Median Family Income
129	Upper	\$62,900	12.2	\$72,446
130	Upper	\$62,900	3.9	\$88,846
131	Middle	\$62,900	15.8	\$50,078
132.01	Middle	\$62,900	3.2	\$49,205
132.02	Upper	\$62,900	10.9	\$76,125
133.01	Middle	\$62,900	11.9	\$58,333
133.03	Upper	\$62,900	7.0	\$76,250
133.04	Upper	\$62,900	5.2	\$77,886
134	Middle	\$62,900	17.1	\$52,338
135	Low-Mod	\$62,900	28.9	\$33,281
136	Low-Mod	\$62,900	25.5	\$37,500
137	Low-Mod	\$62,900	20.8	\$37,312
138	Middle	\$62,900	18.4	\$51,763
139	Low-Mod	\$62,900	27	\$25,714
140	Low-Mod	\$62,900	38.8	\$35,074
141	Middle	\$62,900	12.8	\$52,857
142	Middle	\$62,900	4.5	\$62,049

Source: FFIEC 2012, American Community Survey 2008 to 2012

TABLE 18: Demographic Data by Census Tract 2012

Tract Code	Tract Pop.	Number of Hshlds	Non-Hisp White	% Non-Hisp White	Black	% Black	American Indian	% American Indian	Asian	% Asian	Native Hawaiian/Pacific Islander	% Native Hawaiian/Pacific Islander	Other or Two or More	% Other or Two or More	Hispanic/Latino (all races)	% Hispanic/Latino (all races)
129	1,123	614	1,123	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
130	4,452	1877	4,081	91.7%	88	2.0%	0	0.0%	65	1.5%	16	0.4%	130	2.9%	175	3.9%
131	2,399	1277	2,114	88.1%	153	6.4%	18	0.8%	47	2.0%	0	0.0%	38	1.6%	87	3.6%
132.01	2,132	974	1,984	93.1%	16	0.8%	0	0.0%	0	0.0%	0	0.0%	84	3.9%	132	6.2%
132.02	3,350	1487	2,904	86.7%	0	0.0%	0	0.0%	84	2.5%	0	0.0%	170	5.1%	302	9.0%
133.01	5,057	2404	4,395	86.9%	444	8.8%	41	0.8%	46	0.9%	0	0.0%	116	2.3%	15	0.3%
133.03	3,011	1106	2,903	96.4%	17	0.6%	0	0.0%	0	0.0%	0	0.0%	42	1.4%	49	1.6%
133.04	6,134	2463	5,761	93.9%	42	0.7%	0	0.0%	93	1.5%	0	0.0%	199	3.2%	54	0.9%
134	4,012	1771	3,573	89.1%	48	1.2%	0	0.0%	116	2.9%	0	0.0%	158	3.9%	119	3.0%
135	1,945	896	1,388	71.4%	272	14.0%	0	0.0%	55	2.8%	0	0.0%	161	8.3%	86	4.4%
136	3,820	1766	3,460	90.6%	267	7.0%	13	0.3%	0	0.0%	0	0.0%	70	1.8%	35	0.9%
137	3,535	1522	2,862	81.0%	390	11.0%	0	0.0%	65	1.8%	0	0.0%	52	1.5%	166	4.7%
138	3,436	1435	3,103	90.3%	96	2.8%	0	0.0%	0	0.0%	0	0.0%	122	3.6%	115	3.3%
139	2,505	1066	1,706	68.1%	316	12.6%	30	1.2%	104	4.2%	0	0.0%	162	6.5%	201	8.0%
140	2,974	1206	1,826	61.4%	235	7.9%	0	0.0%	555	18.7%	0	0.0%	284	9.5%	235	7.9%
141	3,284	1378	3,124	95.1%	10	0.3%	0	0.0%	55	1.7%	0	0.0%	63	1.9%	58	1.8%
142	2,933	1349	2,624	89.5%	58	2.0%	0	0.0%	87	3.0%	0	0.0%	49	1.7%	153	5.2%

Source: American Community Survey 2008 to 2012

TABLE 19: Home Purchase Loans Denials by Census Tract 2012

Tract Code	Loans Originated	Approved not Accepted	Applications Denied	% Denied	Application Withdrawn	File Closed Incomplete
129	10	0	2	20.0%	2	0
130	38	5	3	7.9%	8	0
131	17	1	2	11.8%	0	0
132.01	25	0	2	8.0%	1	1
132.02	27	2	3	11.1%	6	0
133.01	35	3	6	17.1%	7	1
133.03	25	1	0	0.0%	2	0
133.04	56	2	9	16.1%	6	0
134	24	2	5	20.8%	1	0
135	7	1	6	85.7%	0	0
136	13	1	3	23.1%	2	0
137	17	1	5	29.4%	2	0
138	21	1	2	9.5%	1	2
139	8	0	3	37.5%	2	0
140	9	0	0	0.0%	2	0
141	31	2	2	6.5%	2	0
142	25	2	7	28.0%	7	0

Source: FFIEC 2012

TABLE 20: Applications by Detailed Category 2012, Binghamton MSA, Conventional Home-Purchase Loans

	Applications Received	Loans Originated	Applications Approved But Not Accepted	Applications Denied	% of Applications Denied	Applications Withdrawn	Files Closed as Incomplete
American Indian							
Male							
Female							
Joint (Male/Female)							
Asian	29	18		4	14%	6	1
Male	8	6		1	13%		
Female	4	3		1	25%	1	
Joint (Male/Female)	17	9		2	12%	5	1
Black	16	9	3	3	19%		1
Male	6	4	1				1
Female	8	3	2	3	38%		
Joint (Male/Female)	2	2					
Pacific Islander							
Male							
Female							
Joint (Male/Female)							
White (Hispanic and non-Hispanic)	1105	754	86	157	14%	96	12
Male	378	238	31	65	17%	38	6
Female	255	175	18	32	13%	27	3
Joint (Male/Female)	472	341	37	60	13%	31	3
Joint or Multiple Race	10	1251		3	30%		
Male							
Female	2	156		1	50%		
Joint (Male/Female)	8	1095		2	25%		
Race Not Available	80	40	11	18	23%	8	3
Male	7	1	2	3	43%	1	
Female	6	2	1	2	33%	1	
Joint (Male/Female)	17	6	2	5	29%	1	3
Hispanic or Latino	9	6	2			1	
Male	6	4	1			1	
Female	3	2	1				
Joint (Male/Female)							
Not Hispanic or Latino	1112	773	80	145	13%	99	15
Male	377	241	30	61	16%	38	7
Female	254	179	17	29	11%	26	3
Joint (Male/Female)	481	353	33	55	11%	35	5
Joint (Hispanic and non-Hispanic)	7	6				1	
Male							
Female							
Joint (Male/Female)	7	6				1	
Ethnicity Not Available	112	43	18	40	36%	9	2
Male	16	4	3	8	50%	1	
Female	18	3	3	10	56%	2	
Joint (Male/Female)	28	5	6	14	50%	1	2
White, non-Hispanic	1058	740	77	136	13%	93	12
Male	363	232	28	60	17%	37	6
Female	244	173	16	26	11%	26	3
Joint (Male/Female)	451	335	33	50	11%		3
Minority (all)	69	45	4	10	14%	8	2
Male	20	14	2	1	5%	2	1
Female	15	8	2	5	33%		

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Joint (Male/Female)	34	23		4	12%	6	1
Less than 50% of MSA Median	125	47	13	56	45%	9	
50-79% of MSA Median	276	165	32	47	17%	28	4
80-99% of MSA Median	161	117	11	18	11%	13	2
100-119% of MSA Median	149	102	8	23	15%	13	3
120% or More of MSA Median	496	377	33	34	7%	44	8
Income Not Available	33	20	3	7	21%	3	

Source: FFIEC 2012

TABLE 21: Reason for Denial by Category 2012, Binghamton MSA, Conventional Home-Purchase Loans

	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race																		
American Indian																		
Asian					1	33%	1	33%									1	33%
Black					1	17%			1	17%			1	17%	2	33%	1	17%
Pacific Islander																		
White	40	25%	4	2%	69	42%	12	7%	10	6%	4	2%	4	2%	5	3%	15	9%
Multiple Race																		
Joint	1	33%			2	67%												0%
Race Not Available	5	20%			6	24%	3	12%	2	8%	1	4%	1	4%	2	8%	5	20%
Ethnicity																		
Hispanic or Latino																		
Non Hispanic or Latino	32	22%	4	3%	53	37%	13	9%	10	7%	4	3%	5	3%	6	4%	17	12%
Joint																		
Ethnicity Not Available	14	25%			26	47%	3	5%	3	5%	1	2%			3	5%	5	9%
Minority Status																		
White (non-Hispanic)	31	23%	4	3%	52	38%	12	9%	10	7%	4	3%	4	3%	5	4%	14	10%
Minority (all)	1	8%			4	33%	1	8%	1	8%			1	8%	2	17%	2	17%
Gender																		
Male	14	19%	3	4%	27	37%	10	14%	7	10%			1	1%	2	3%	9	12%
Female	14	25%			21	38%	1	2%	4	7%	3	5%	2	4%	4	7%	7	13%
Joint	17	27%	1	2%	29	45%	4	6%	2	3%	1	2%	2	3%	3	5%	5	8%
Gender Not Available	1	17%			2	33%	1	17%			1	17%					1	17%
Income																		
Less than 50% of MSA Median	22	35%	1	2%	29	47%	2	3%			1	2%	1	2%	1	2%	5	8%
50-79% of MSA Median	9	18%			20	41%	3	6%	7	14%			2	4%	3	6%	5	10%
80-99% of MSA Median	4	18%	2	9%	8	36%	1	5%	1	5%	1	5%			3	14%	2	9%
100-119% of MSA Median	4	20%	1	5%	9	45%	2	10%			2	10%					2	10%
120% or More of MSA Median	5	13%			11	28%	8	21%	4	10%			2	5%	2	5%	7	18%
Income Not Available	2	29%			2	29%			1	14%	1	14%					1	14%

Source: FFIEC 2012 Census Data