

Rockland County



2015 - 2019 Draft Analysis of Impediments to Fair Housing Choice



Rockland County Comprehensive Plan 2011

Google Maps

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1. EXECUTIVE SUMMARY

As a Community Development Grant (CDBG) entitlement community and recipient of Federal entitlement grant funds, Rockland County (County) is required by the U.S. Department of Housing & Urban Development (HUD) to certify that they will “affirmatively further fair housing” within their jurisdictions. The preparation of this *Analysis of Impediments to Fair Housing Choice* (AI) serves as a critical part of Rockland County’s efforts to satisfy the requirements of the Housing and Community Development Act of 1974 as amended. The AI is an assessment of public and private conditions that affect fair housing choice and a comprehensive review of local laws, regulations and administrative policies, procedures and practices that affect the location and availability of accessible housing.

The Rockland County Office of Community Development (County) is the overall administrative agent for the Federal Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) program. The County receives Housing Opportunities for Persons with HIV/AIDS (HOPWA) program funds through a consortium with the City of New York. The Office of Community Development is also designated as the lead agency for the Continuum of Care. These programs, which are all funded through the U.S. Department of Housing & Urban Development (HUD), are intended to support the goals of providing decent housing, providing a suitable living environment and expanding economic opportunities for low and moderate income people.

Rockland County hired a consultant, Ferrandino & Associates Inc., to write the 2015-2019 Analysis of Impediments. The Consultant conducted analyses, wrote narrative sections, partnered with the Office of Community Development for public input processes and conducted consultation meetings and interviews with stakeholders. To write the Fair Housing Plan, the Consultant worked with the County to establish priorities, goals and projects to meet the needs of the community. The Consultant also updated the County’s *Community Participation Plan* (CPP) and *2015-2019 Consolidated Plan* as follows:

The Rockland County Office of Community Development has made extensive efforts to consult with other public and private entities that provide assisted housing, health services and social services in the development of the *2015-2019 Consolidated Plan and AI*:

- An online housing, homeless and non-housing community development needs survey (English and Spanish) was made available to the public from May 7, 2015 through June 15, 2015.
- A housing and homeless needs & impediments to fair housing choice questionnaire was distributed to service providers on May 11, 2015.
- Service provider meetings were held for the AI and Consolidated Plan on May 18, 2015 and May 21, 2015 to obtain input from public, private and non-profit organizations whose missions focus on providing affordable housing and human services to low and moderate income persons.

- Public housing forum #1 was held on May 21, 2015 at 3 PM at the Rockland County Department of Community Development offices.

To ensure that the input and opinions of the protected classes were represented in the development of the Analysis of Impediments to Fair Housing, the County will hold public housing forum #2 on June 25, 2015 at 3 PM at the Rockland County Department of Community Development offices to discuss the County's impediments to fair housing.

Census data indicated that the population of Rockland County is growing, as it increased by 7 percent to 299,975 persons while the number of households grew by 5 percent to 96,162 households between 2000 and 2011. While all of the towns within the County experienced population growth between 2000 and 2011, the Towns of Ramapo (14.4%) and Haverstraw (7.3%) experienced the largest increases. All but four of the County's 19 villages demonstrated a population growth between 2000 and 2011, with the Villages of New Square (44.2%), Kaser (37.7%), Spring Valley (21.0%) and Montebello (20.3%) in the Town of Ramapo experiencing the largest population growth. There are 17 hamlets located in the County that are identified as Census Designated Places by the Census Bureau. The most significant increases in population in the County's Census Designated Places occurred in Orangeburg in the Town of Orangetown (34.8%), Viola in the Town of Ramapo (25.3%) and Hillcrest in the Town of Ramapo (17.5%).

Census data indicated that the County is experiencing both a steady population growth and a substantial demographic shift. The overall distribution of the County's population by race has shifted between 2000 and 2013. Between 2000 and 2013, the ratio of White people is estimated to have decreased by the same amount that the ratio of the racial minority population increased (4.7%). As a percentage of the overall population, the All Other Races racial minority category experienced the biggest change between 2000 and 2013, from 4.1 percent to 7.4 percent of the population. Nearly one third of Rockland County's residents are Jewish, or roughly 100,000 persons today, and the County may have the highest Jewish population per capita of any County in the U.S¹. The Villages of New Square, Kaser, New Hempstead, Wesley Hills and the hamlet of Monsey comprise major centers of Jewish culture. A large portion (13.9 percent) of the County's estimated population was aged 65 and over in 2013, an increase of almost 10,000 persons (30%) from 2000. An estimated 16.2 percent of the disabled population over 5 years of age in Rockland County was estimated to live below the poverty level in 2013 (2011-2013 ACS).

The ratio of Hispanic/Latino persons in Rockland County increased by nearly six percentage points between 2000 and 2013. Substantial population increases also occurred within the County's foreign-born population, which increased by more than 25 percent between 2000 and 2013. The countries most represented in the County's foreign-born population are: Haiti (9,683 persons), India (5,526 persons), Guatemala (5,177 persons), Dominican Republic (5,131 persons) and Ecuador (3,725 persons). The County also experienced a significant population shift in terms of reported ancestry between 2000 and 2013, with losses experienced in the English, German, Italian and Russian European ancestries and significant gains in individuals reporting

¹ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, March 1, 2011.

Eastern European and West Indian heritage. In 2013, an estimated 55.3 percent of the County's foreign born population were naturalized citizens. Within Rockland County, 73.4 percent of the foreign born population from Europe was naturalized and 71.3 percent of the foreign born population from Asia was naturalized, compared with 40.7 percent for persons born in Latin America. In 2013, an estimated 47,944 persons in Rockland County spoke English less than "very well," representing 16.5 percent of the County's population among persons ages 5 and above (*2009-2013 American Community Survey*). Spanish/Spanish Creole (38.4%), Yiddish (25.7%) and French Creole (11.8%) speakers who spoke English less than "very well" made up the majority (75.9%) of all speakers with Limited English Proficiency (LEP) in Rockland County.

Between 2000 and 2011 the median income of Rockland County households grew by almost a quarter from \$67,821 to \$84,661. At the same time, the poverty rate grew by 2.1 percent from 9.5 percent to 11.6 percent. Although the median household income increased significantly in all five of the County's towns, the rate of change varied significantly, with Stony Point demonstrating the most significant change (42.2%) and Ramapo experiencing the least growth of median income (15.4%) – see Table 3.3. In 2011, The Towns of Stony Point, Clarkstown and Orangetown were estimated to have the largest increases and highest median incomes in the County, with median incomes of \$102,326, \$102,065 and \$91,618, respectively. The Towns of Haverstraw and Ramapo, with median incomes of \$71,512 and \$69,635, had the lowest median incomes in the County in 2011. At the same time, all but one (1) of the County's five (5) towns experienced an increase in the number of people living below the poverty line. The poverty rate decreased slightly for Stony Point between 2000 and 2011, while it increased by 3.30 percent in Ramapo during the same period of time. The Town of Haverstraw experienced the second highest increase of poverty rate, with an increase of one percent.

The three largest ethnic/racial demographic groups in Rockland County are White, Hispanic and Black/African American. Within this group, the White demographic has the highest median income and the Black/African American demographic group has a median household income rate that is 23.6 percent lower than the White median income. However, the poverty rate for the White demographic group is higher than for the Black/African American demographic group. The Hispanic demographic has the lowest median income and highest poverty rate, although rates for all demographic groups are much higher than in the New York MSA. In 2013, the unemployment rate in Rockland County (8.3%) was significantly lower than for New York State as a whole (16.0%). Black/African American and Hispanic residents were more likely to be unemployed than White Residents, with unemployment rates of 13.0 percent and 10.6 percent respectively, compared with the White rate of 7.3 percent. In 2013, the unemployment rate in Rockland County (8.3%) was significantly lower than for New York State as a whole (16.0%). Black/African American and Hispanic residents were more likely to be unemployed than White residents, with unemployment rates of 13.0 percent and 10.6 percent, respectively, compared with the White unemployment rate of 7.3 percent. The analyses demonstrated that racial and ethnic minorities, persons with disabilities, seniors ages 65 and above and households with children were most likely to experience poverty and unemployment.

Proximity to the New York City job market has bolstered high property values in the southern areas of Rockland County in the past decade. Median home prices have been soaring in recent years as home buyers and renters get priced out of other markets, including Westchester County and parts of New Jersey and Connecticut. The 2011 median home value was \$465,100, a 99 percent increase over the 2000 median home values of \$234,300. Contract rents also increased from \$811 in 2000 to \$1,156 in 2011 (a 43% increase). The Rockland County Fair Market Rents are typically not representative of fair market rents for the County's low and moderate income population who earn less than the County's median income. In 2011 Rockland County's Fair Market Rent for a two-bedroom unit was \$1,474 (Table 36), which increased modestly to \$1,481 in 2015. The HUD Fair Market Rents are higher than the County's median contract rent (\$1,156), but in line with the actual rents paid, with approximately three out of four renters (73.8%) in the County paying less than \$1,500 per month on rent. In order to be able to afford to pay \$1,500 in rent without being cost-burdened (spending 30 percent or more on housing costs), a Rockland County household would need to earn \$5,000 monthly/\$60,000 annually which is 29 percent less than the average median household income for the County.

The tax burden in Rockland County is another significant influence on housing costs. The property tax burden in Rockland County adversely affects housing costs for people of all incomes but makes homeownership particularly challenging for extremely low to moderate income households. High tax rates can also be burdensome to low-income homeowners and can result in high rents. Historically, minorities tend to have lower home ownership rates than Whites. In 2011 in Rockland County, Whites had a homeownership rate of 74.7 percent. By comparison, Blacks/African Americans owned their homes at a rate of 53.3 percent and Hispanics, 48.3 percent. Asians had a home ownership rate of 82.2 percent, the highest of any race or ethnic group, although they represent only 6.1 percent of the County's population. Lower-income minority households tend to experience heavy housing cost burdens at a higher rate than lower-income White households, a circumstance due at least in part to the disparity in median income among racial and ethnic groups.

An analysis of segregation patterns indicates that concentrations of low and moderate income Black/African American people are located almost exclusively in the Towns of Haverstraw, Orangetown (Village of Nyack) and Ramapo. The Black/African American population is moderately segregated in Rockland County, as the Black-White index of dissimilarity, which measures population distribution between the two demographic groups, indicates that 55.0 percent of the Black/African American population would have to move to another neighborhood in order to create even distribution in the County. Concentrations of low and moderate income Hispanic people are located almost exclusively in in the Towns of Ramapo and Haverstraw. The Hispanic population is moderately segregated in Rockland County, as the Hispanic-White index of dissimilarity, which measures population distribution between the two demographic groups, indicates that 46.5 percent of the Hispanic population would have to move to another neighborhood in order to create even distribution in the County. Concentrations of low and moderate income Yiddish speaking people are located almost exclusively in the Town of Ramapo. The Yiddish speaking population is highly segregated in Rockland County, as the Yiddish-English speaking index of dissimilarity, which measures population distribution between the two language

groups, indicates that 86.1 percent of the Yiddish speaking population would have to move to another neighborhood in order to create even distribution in the County. Overall, the analysis of community assets above shows that the County's strongest community assets continue to be transportation and parks/open space. These assets serve residents of racially/ethnically concentrated areas of poverty fairly well. However, low and moderate income minority residents in Nyack, Haverstraw, West Haverstraw and particularly Spring Valley experience disparities in access to good public schools compared with other school districts in Rockland County.

Between 2010 and 2014, 14 fair housing complaints were processed by the New York State Division of Human Rights (NYSDHR) and 44 were processed by Rockland County Commission on Human Rights (RCCHR) Fair Housing Board. One out of every two housing discrimination complaints in the County processed by HUD, NYSDHR and RCCHR were filed by persons with disabilities, who frequently report barriers to obtaining reasonable accommodations or modifications. According to advocacy organizations for persons with disabilities, the limited availability of affordable and accessible housing units is a significant impediment to fair housing choice in Rockland County. The age of the County's housing stock and associated cost of retrofitting older structures is a significant impediment.

An extensive review of public policy was undertaken in this *Analysis of Impediments to Fair Housing Choice report*. The public policy review covered aspects of local government that are directly related to housing, including an analysis of municipal zoning ordinances, provision of accommodations to persons with limited English proficiency, subsidized housing, taxes, affirmative marketing and transit. While specific actions were identified in a few areas of the County as ways to improve fair housing choice, the majority of County policy and program administration was found to be consistent with fair housing goals. The two most significant impacts on fair housing issues in the County from the public sector come from external factors or jurisdictions: 1) real estate market prices, compounded by property tax burden, 2) lack of land available and suitable for housing development and 3) local zoning ordinances.

Given the fragmented nature of Rockland County's regulatory and planning environment, a broad range of jurisdictions maintain policies and ordinances that may have the potential to raise fair housing concerns. In particular, local zoning ordinances can impact the production of multifamily housing, accessory dwelling units, emergency shelters, transitional housing and community care facilities, all of which serve lower income households and special needs populations. The zoning ordinance analysis of 22 of the 24 jurisdictions in Rockland County identified 231 unique zoning districts that regulate permitted uses and bulk regulations in Rockland County. The number of zoning districts within an individual jurisdiction ranged from one (1) district to 20 districts. Of the 231 zoning districts assessed, 168 permit residential use. Of the 22 zoning ordinances assessed, seven (7) do not incorporate zoning districts that permit the development of new multifamily uses of 3 or more units. Ten (10) municipalities contain zoning districts that permit multifamily uses either as of right or via special permit. As demonstrated in the analysis, many jurisdictions in the County do not currently have land use policies and zoning in place which would permit the

development of a full range of choices to meet the County's diverse housing needs and facilitate fair housing choice for all segments of the population.

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure, and the likelihood that properties will fall into disrepair. In 2013, there were 43,173 conventional home purchase loans made for single- to four-family houses in the New York-White Plains-Wayne, NY-NJ MSA/MD. Of this total, 211 reported pricing data of which 51 were reported as high-cost mortgages. Overall, upper-income households (24.7%) were less likely to have high-cost mortgages than lower-income households (47.6%). A review of mortgage application data indicated that loan applications for all types of loans within minority Census Tracts (defined as Tracts with the highest concentrations of Black/African American, Hispanic and Yiddish speaking persons as outlined in Section 4) accounted for 16.4 percent of all applications, with an average success rate (defined as "originated loans") of 46.7 percent.

This AI identifies nine (9) impediments to fair housing choice and provides a series of goals, actions, benchmarks and timelines to address each impediment. The nine (9) impediments to fair housing choice identified in this report are: 1) Real estate market prices; 2) Lack of land available and suitable for housing development; 3) Local zoning ordinances; 4) Lack of affordable housing to serve protected classes; 5) Age and condition of the housing stock; 6) Inadequate knowledge of fair housing rights and requirements; 7) Loss of subsidized and affordable housing stock; 8) Overall discrimination in the housing market and 9) Discriminatory lending policies and practices.

While it is clear that affordable and fair housing are not the same things, the provision of affordable housing is often a key element of affirmatively fostering fair housing choice, particularly to protected classes. Many of the impediments identified in this report are not unique to Rockland County and can be found in communities throughout the New York metro area and the nation. Economic and racial/ethnic segregation, two of the County's biggest challenges, are a national issue. However, it is primarily the responsibility of the County and each local jurisdiction to address these issues. The development of this Analysis of Impediments to Fair Housing Choice and the included Fair Housing Action Plan are important tools the County can use to address these issues and continue to increase fair housing choice in Rockland County.

2. INTRODUCTION

All persons have the right to fair housing. Title VIII of the Civil Rights Act of 1968 along with the Fair Housing Amendments of 1988 (together known as the Fair Housing Act), the New York State Human Rights Law (NYS Executive Law Article 15, Section 296 et. Seq.) and the Rockland County Fair Housing Law establish protected classes under those laws. The Federally protected group identity categories applicable to Rockland County include race, color, national origin religion, sex, disability and familial status. The State and County Fair Housing Laws also include age, sexual orientation, marital status, military status and creed. As stated in these laws, all persons share the right to fair housing – discrimination in the sale, rental, financing and insuring of housing is prohibited by law.

Rockland County is comprised of five towns and 19 villages, each with varying degrees of responsibility, oversight and regulatory authority beyond that of the County's. Map 1 shows the town and village boundaries within Rockland County. It is important to understand which local entities below the County level are also responsible for enforcing and encouraging fair housing.

The County's town and village organization will likely impact how the fair housing recommendations are implemented, as the Town of Ramapo will require a different approach with its 11 villages relative to the Town of Stony Point, with no village-level authorities. Along with these 24 defined jurisdictions below the County level, there are also 16 Census Designated Places (CDPs) which do not have municipal authorities but are recognized places and are referenced throughout this report. Identified CDPs include:

- Hillcrest – Town of Ramapo
- Monsey – Town of Ramapo
- Viola – Town of Ramapo
- Bardonia – Town of Clarkston
- Congers – Town of Clarkstown
- Nanuet – Town of Clarkstown
- New City – Town of Clarkstown
- Valley Cottage – Town of Clarkstown
- West Nyack – Town of Clarkstown
- Blauvelt – Town of Orangetown
- Orangeburg – Town of Orangetown
- Pearl River – Town of Orangetown
- Sparkill – Town of Orangetown
- Tappan – Town of Orangetown
- Mount Ivy – Town of Haverstraw
- Thiells – Town of Clarkstown
- Stony Point – Town of Stony Point

Along with the towns and villages, these CDPs add another layer of analysis to the County's efforts to further fair housing choice throughout its various jurisdictions (see Map 1.2).

The Rockland County Office of Community Development (County) is the overall administrative agent for the Federal Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grant (ESG) and Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs for the County. These programs, which are all funded through the U.S. Department of Housing & Urban Development (HUD), are intended to support the goals of providing decent housing, providing a suitable living environment and expanding economic opportunities for low and moderate income people.

As a Community Development Block Grant (CDBG) entitlement community, Rockland County is required to comply with the Federal Fair Housing Act in administering all CDBG programs. The responsibility to comply with the Federal Fair Housing Act also extends to nonprofit organizations and other organizations that receive Federal funds through the County. The lead agency, the Rockland County Office of Community Development, has prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy the Housing and Community Development Act of 1974 requirements as amended. The Office coordinated its efforts with other public service agencies to conduct this analysis of impediments to fair housing choice.

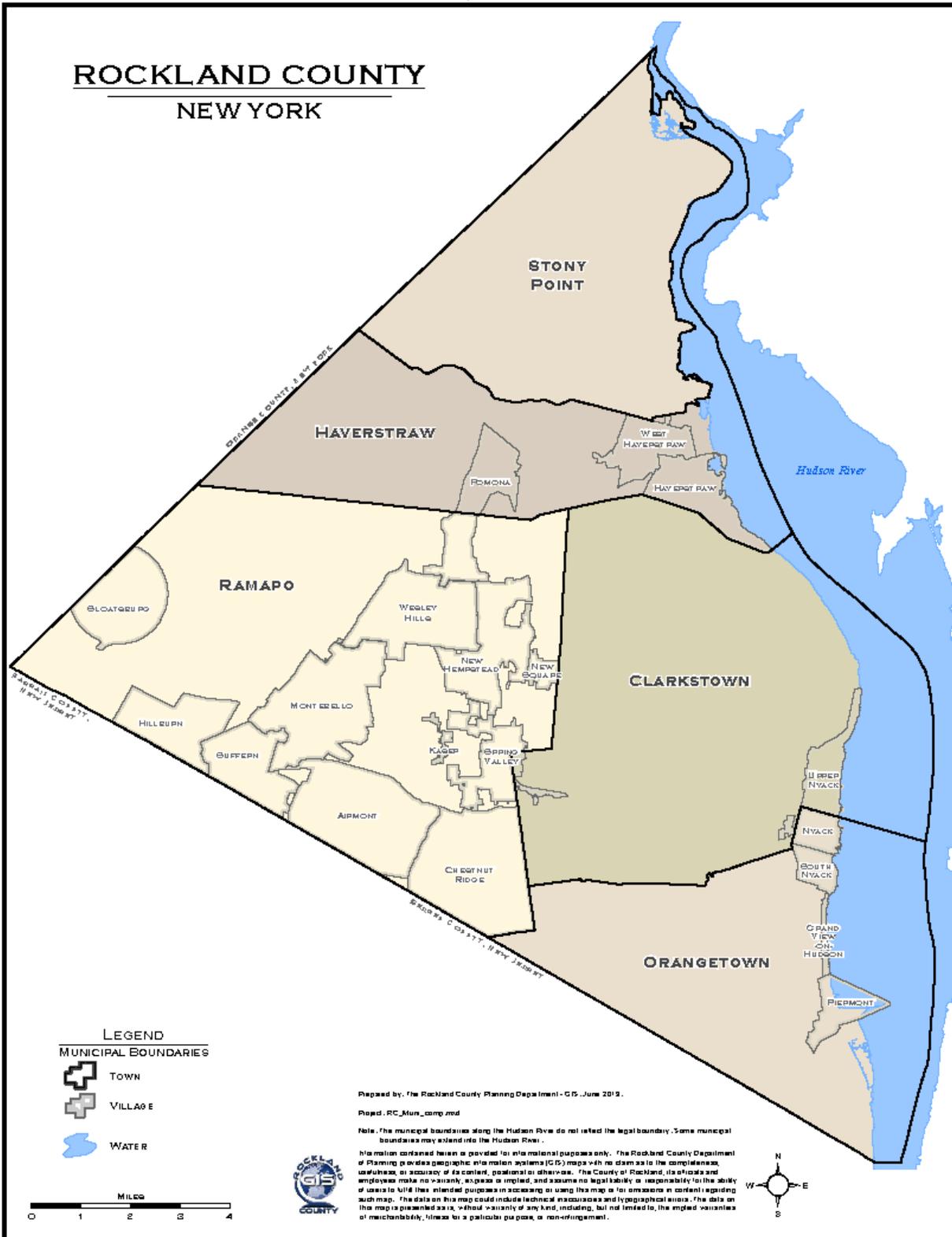
Rockland County hired a consultant, Ferrandino & Associates Inc., to write the 2015-2019 Analysis of Impediments. The Consultant conducted analyses, wrote narrative sections, partnered with the Office of Community Development for public input processes and conducted consultation meetings and interviews with stakeholders. To write the Fair Housing Plan, the Consultant worked with the County to establish priorities, goals and projects to meet the needs of the community. The Consultant also updated the County's *Community Participation Plan (CPP)* and *2015-2019 Consolidated Plan*.

The Rockland County Office of Community Development has made extensive efforts to consult with other public and private entities that provide assisted housing, health services and social services in the development of the *2015-2019 Consolidated Plan and AI*:

- An online housing, homeless and non-housing community development needs survey (English and Spanish) was made available to the public from May 7, 2015 through June 15, 2015.
- A housing and homeless needs & impediments to fair housing choice questionnaire was distributed to service providers on May 11, 2015.
- Service provider meetings were held for the AI and Consolidated Plan on May 18, 2015 and May 21, 2015 to obtain input from public, private and non-profit organizations whose missions focus on providing affordable housing and human services to low and moderate income persons.
- Public housing forum #1 was held on May 21, 2015 at 3 PM at the Rockland County Department of Community Development offices.

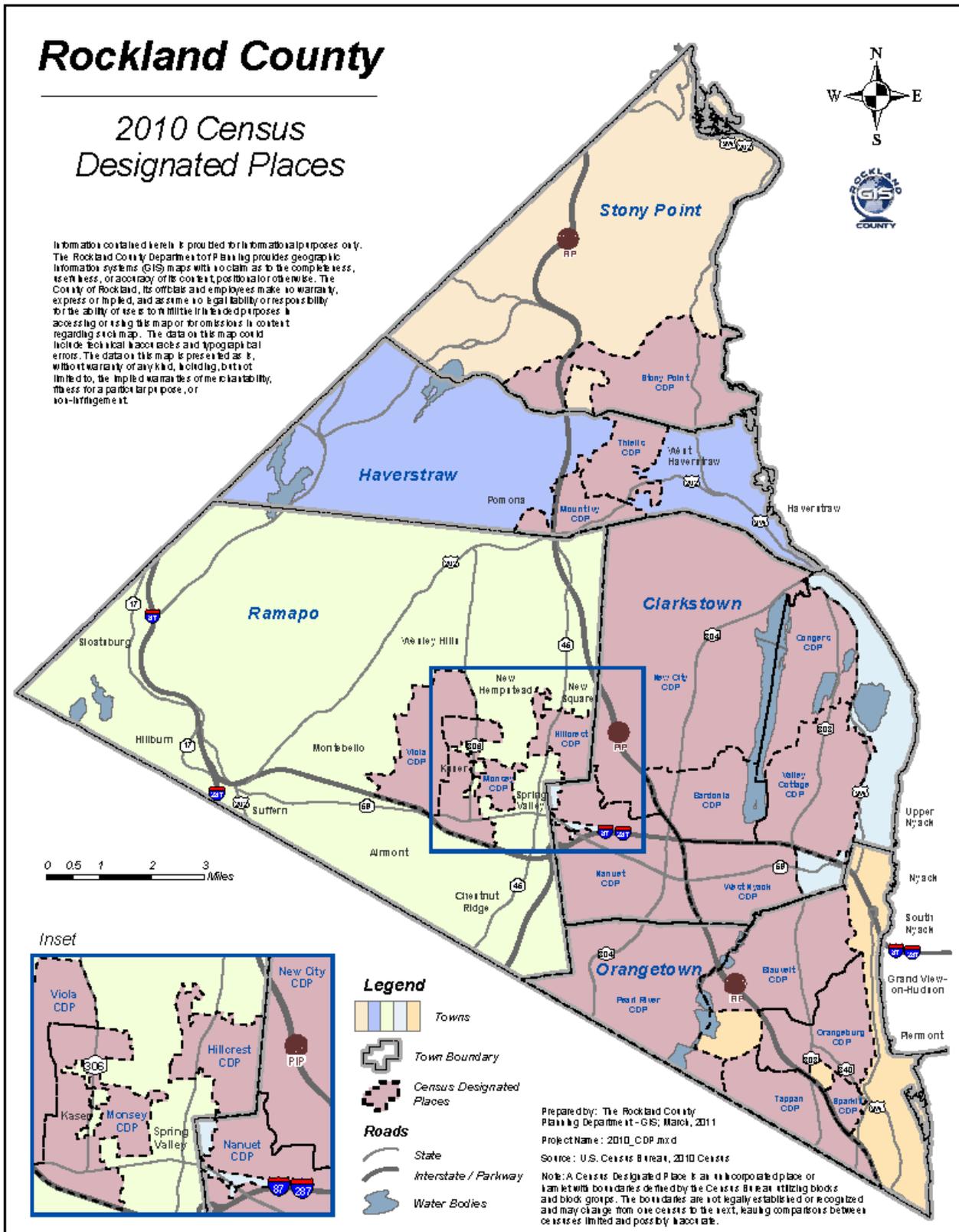
To ensure that the input and opinions of the protected classes were represented in the development of the Analysis of Impediments to Fair Housing, the County will hold public housing forum #2 on June 25, 2015 at 3 PM at the Rockland County Department of Community Development offices to discuss the County's impediments to fair housing.

Map 2.1 – Jurisdictions in Rockland County



Source: Rockland County (2013)

Map 2.2 – Census Designated Places in Rockland County



Source: Rockland County (2011)

3. DEMOGRAPHIC AND HOUSING PROFILE

In undertaking the demographic and housing research for this section, the County utilized 2000 Census and 2011 and 2013 *Five-Year American Community Survey (ACS)* data in most analyses observing trends over time. The demographic trends focused on data from 2000 to 2013 to provide the most up to date information on Rockland County's population, while the housing market analysis examined 2000 to 2011 data to remain consistent with the data provided in the County's *2015-2019 Consolidated Plan*.

A. DEMOGRAPHIC PROFILE – COUNTY AND JURISDICTIONS

i. Population Trends

Between 2000 and 2011 the population of Rockland County grew by 7 percent to 299,975 persons while the number of households grew by 5 percent to 96,162 households. Table 3.1 displays the population and number of households for a base year (2000) and a recent year (2011) and calculates the percentage of change. In 2013, according to 2009-2013 American Community Survey (ACS) data, the population of Rockland County was 315,069, an increase of 5 percent from 2011, with 98,326 households.

Table 3.1 – County-Wide Population and Household Change (2000 – 2011)

Demographics	2000	2011	% Change 2000-2011
Population	280,266	299,975	7%
Households	91,164	96,162	5%

Data Source: 2000 Census, 2007-2011 American Community Survey

Although the population increased in all five of the County's towns, the rate of change varied significantly, with Ramapo demonstrating the most significant change (14.4%) and Clarkstown experiencing the least population growth (2.2%) – see Table 3.2. In Ramapo, the Villages of Sloatsburg and Suffern experienced mild population loss while the remaining Villages demonstrated a percent increase from 2000 and 2011 ranging from 1.0 percent in Chestnut Ridge to 44.2 percent in New Square. In Sloatsburg, the number of households increased slightly despite the population loss. Although both Villages experienced a population increase between 2000 and 2011, the number of households in New Hempstead and New Square decreased. Upper Nyack, the only Village located completely in the Town of Clarkstown, experienced modest population growth (9.4%) and small household increase (1.8%) between 2000 and 2011. The population of three of the four Villages in Orangetown increased moderately between 2000 and 2011 while the population of Piermont slightly decreased (3.3%). South Nyack experienced a significant decrease in the number of households (11.4%), while the remaining Villages demonstrated a significant increase in the number of households. In the Town of Haverstraw, the Village of Haverstraw experienced an increase in population (15.8%) and households (30.9%), while the Village of West Haverstraw demonstrated a mild population loss (1.5%) and significant loss of households (10.7%).

Table 3.2 – Population and Household Change by Jurisdiction (2000 – 2011)

Jurisdiction	2000		2011		% Change 2000-2011	
	Population	Households	Population	Households	Population	Households
Towns*						
Ramapo	108,905	31,561	124,596	34,668	14.4%	9.8%
Clarkstown	82,082	27,697	83,870	28,679	2.2%	3.5%
Orangetown	47,711	17,330	49,001	17,689	2.7%	2.1%
Haverstraw	33,811	11,255	36,266	12,024	7.3%	6.8%
Stony Point	14,244	4,832	14,949	5,046	4.9%	4.4%
*Town populations include the population in villages						
Villages						
Ramapo						
Airmont	7,799	2,342	8,533	2,788	9.4%	19.0%
Chestnut Ridge	7,829	2,551	7,906	2,488	1.0%	-2.5%
Hillburn	881	273	962	315	9.2%	15.4%
Kaser	3,316	647	4,566	846	37.7%	30.8%
Montebello	3,688	1,163	4,438	1,436	20.3%	23.5%
New Hempstead	4,767	1,282	5,092	1,254	6.8%	-2.2%
New Square	4,624	820	6,668	1,219	44.2%	48.7%
Pomona	2,726	906	3,197	1,033	17.3%	14.0%
Sloatsburg	3,117	1,046	3,047	1,063	-2.2%	1.6%
Spring Valley	25,464	7,566	30,802	8,632	21.0%	14.1%
Suffern	11,006	4,634	10,726	4,393	-2.5%	-5.2%
Wesley Hills	4,848	1,430	5,541	1,524	14.3%	6.6%
Clarkstown						
Upper Nyack	1,863	712	2,039	725	9.4%	1.8%
Note: Spring Valley and Nyack in Ramapo are also partially located in Clarkstown.						
Orangetown						
Grand View	284	132	303	142	6.7%	7.6%
Nyack	6,737	3,188	6,972	3,655	3.5%	14.6%
South Nyack	3,473	1,201	3,518	1,064	1.3%	-11.4%
Piermont	2,607	1,189	2,521	1,298	-3.3%	9.2%
Haverstraw						
Haverstraw	10,117	2,816	11,711	3,685	15.8%	30.9%
West Haverstraw	10,295	3,542	10,144	3,163	-1.5%	-10.7%
Note: Pomona, listed under Ramapo, is also partially located in Haverstraw.						

Data Source: 2000 Census, 2007-2011 American Community Survey

Table 3.3 demonstrates that the most significant increases in population in the County's Census Designated Places occurred in Orangeburg in the Town of Orangetown (34.8%), Viola in the Town of Ramapo (25.3%) and Hillcrest in the Town of Ramapo (17.5%). The remaining Census Designated Places experienced a mild to moderate population increase or a mild population loss. See Maps 4.1 and 4.2 for the general distribution of poverty rates and median incomes in Rockland County

Table 3.3 – Population and Household Change by CDP (2000 – 2011)

Census Designated Places (CDP)						
CDP	2000		2011		% Change 2000-2011	
	Population	Households	Population	Households	Population	Households
Ramapo						
Hillcrest	7,106	1,979	8,346	2,198	17.5%	11.1%
Monsey	14,504	2,981	15,715	3,125	8.3%	4.8%
Viola	5,931	1,681	7,429	1,954	25.3%	16.2%
Clarkstown						
Bardonia	4,367	1,450	4,137	1,375	-5.3%	-5.2%
Congers	8,303	2,695	8,113	2,775	-2.3%	3.0%
Nanuet	16,707	5,975	17,742	6,599	6.2%	10.4%
New City	34,038	11,030	33,717	11,141	-0.9%	1.0%
Valley Cottage	9,269	3,347	9,471	3,412	2.2%	1.9%
West Nyack	3,282	1,107	3,174	1,070	-3.3%	-3.3%
Orangetown						
Blauvelt	5,207	1,564	5,449	1,718	4.6%	9.8%
Orangeburg	3,388	1,335	4,568	1,426	34.8%	6.8%
Pearl River	15,553	5,539	16,026	5,374	3.0%	-3.0%
Sparkill	N/A	N/A	1,166	482	N/A	N/A
Tappan	6,757	2,261	6,473	2,152	-4.2%	-4.8%
Haverstraw						
Mount Ivy	6,536	2,693	6,953	2,658	6.4%	-1.3%
Thiells	4,758	1,503	5,013	1,544	5.4%	2.7%
Stony Point						
Stony Point	11,744	3,991	12,341	4,151	5.1%	4.0%

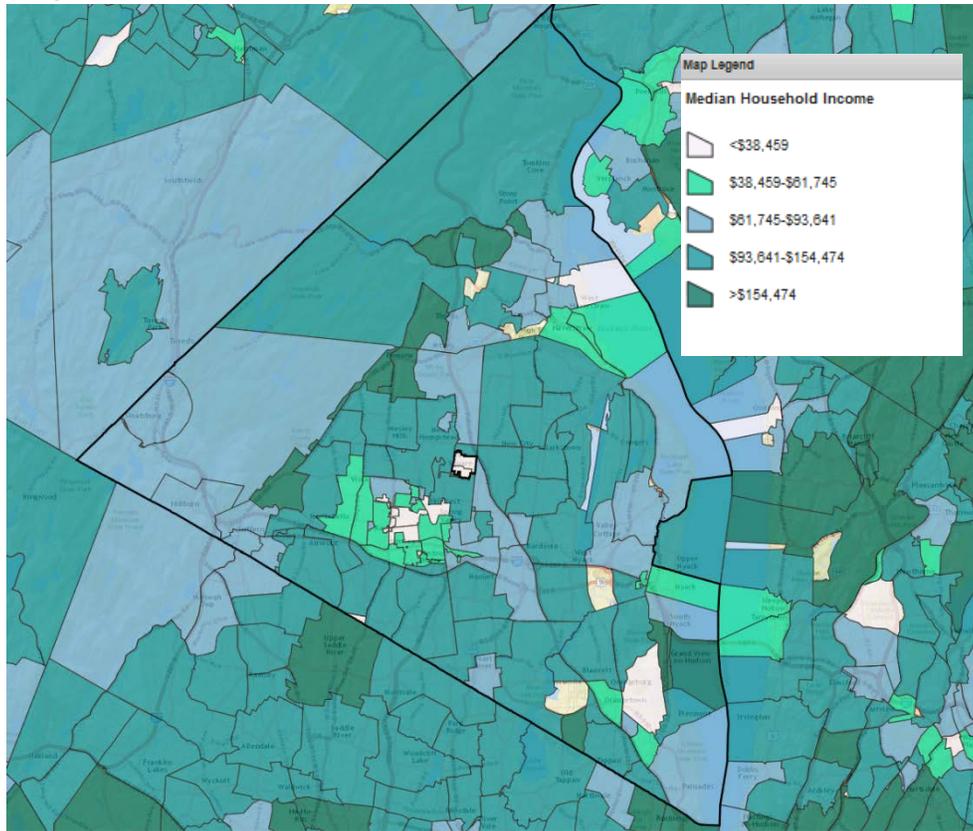
Data Source: 2000 Census, 2007-2011 American Community Survey

ii.

Between 2000 and 2011 the median income of Rockland County households grew by almost a quarter from \$67,821 to \$84,661. At the same time, the poverty rate grew by 2.1 percent from 9.5 percent to 11.6 percent. Table 3.4 displays the median income and poverty rate for a base year (2000) and a recent year (2011) and calculates the percentage of change for each jurisdiction and Census Designated Place. In 2013, according to 2009-2013 American Community Survey (ACS) data, while the median income of Rockland County was \$84,951, an increase of less than one (1) percent from 2011, the poverty rate increased by 2 percent to 13.6 percent.

Map 3.1 - Median Household Income

Table 3.4 –
Change
Median
and
Poverty
by



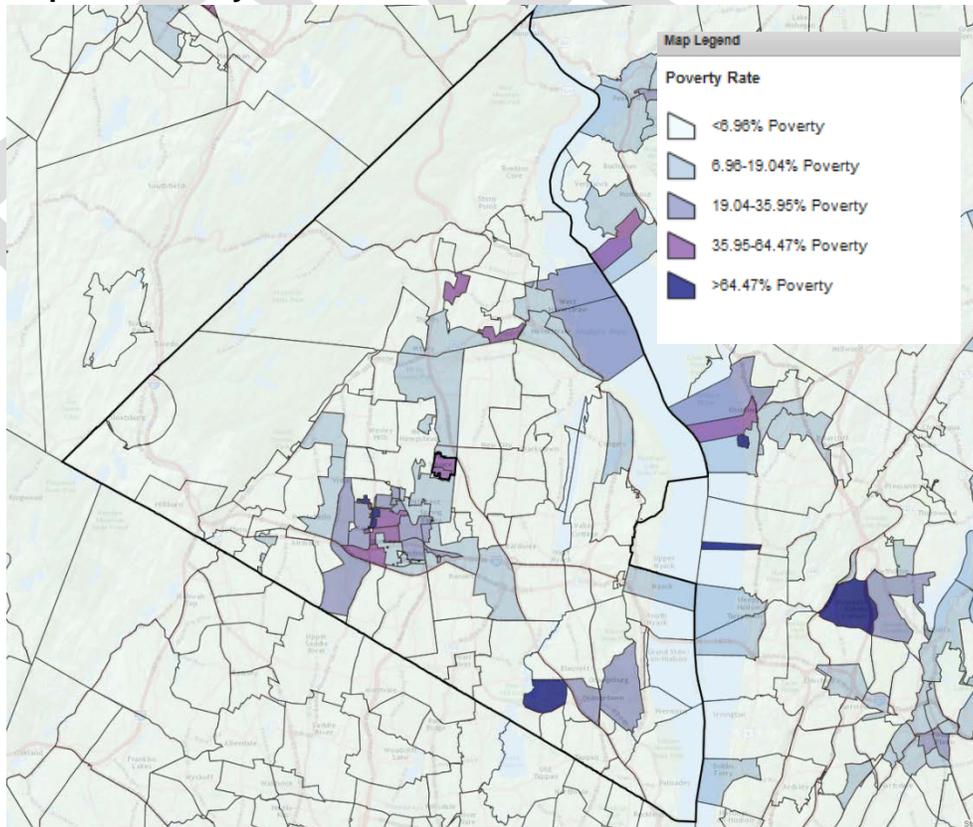
in
Income
Rate

(2000 –

Map 3.2 - Poverty Rate

Jurisdiction

2011)



Jurisdiction	2000		2011		% Change 2000-2011	
	Median Income (\$)	Poverty Rate (%)	Median Income (\$)	Poverty Rate (%)	Median Income	Poverty Rate
Towns*						
Ramapo	60,352	16.3	69,635	19.6	15.4%	3.30%
Clarkstown	82,107	3.8	102,065	4.5	24.3%	0.70%
Orangetown	70,477	4.8	91,618	5.3	30.0%	0.50%
Haverstraw	53,850	10.6	71,519	11.6	32.8%	1.00%
Stony Point	71,940	3.7	102,326	3.5	42.2%	-0.20%
*Town populations include the population in villages						
Villages						
Ramapo						
Airmont	87,678	3.3	99,615	7.5	13.6%	4.20%
Chestnut Ridge	86,468	3.5	110,417	4.8	27.7%	1.30%
Hillburn	54,625	14.8	83,875	6.3	53.5%	-8.50%
Kaser	13,125	66.4	19,855	67.7	51.3%	1.30%
Montebello	116,600	3.3	141,778	2.5	21.6%	-0.80%
New Hempstead	95,472	4.2	117,700	1.0	23.3%	-3.20%
New Square	12,162	72.5	24,260	57.6	99.5%	-14.90%
Pomona	103,608	2.0	157,837	3.2	52.3%	1.20%
Sloatsburg	70,721	3.0	88,184	3.2	24.7%	0.20%
Spring Valley	41,311	18.7	48,371	21.1	17.1%	2.40%
Suffern	59,754	5.7	72,618	3.7	21.5%	-2.00%
Wesley Hills	91,613	7.1	113,929	2.1	24.4%	-5.00%
Clarkstown						
Upper Nyack	91,156	3.4	116,080	4.6	27.3%	1.20%
Note: Spring Valley and Nyack in Ramapo are also partially located in Clarkstown.						
Orangetown						
Grand View	130,747	1.4	156,250	5.6	19.5%	4.20%
Nyack	54,890	6.0	47,979	8.8	-12.6%	2.80%
South Nyack	53,000	8.9	92,337	6.3	74.2%	-2.60%
Piermont	61,591	9.0	96,705	4.4	57.0%	-4.60%
Haverstraw						
Haverstraw	42,683	16.9	50,498	16.6	18.3%	-0.30%
West Haverstraw	48,420	10.6	77,232	8.9	59.5%	-1.70%
Note: Pomona, listed under Ramapo, is also partially located in Haverstraw.						

Data Source: 2000 Census, 2007-2011 American Community Survey

Although the median household income increased significantly in all five of the County's towns, the rate of change varied significantly, with Stony Point demonstrating the most significant change (42.2%) and Ramapo experiencing the least growth of median income (15.4%) – see Table 3.3. In 2011, The Towns of Stony Point, Clarkstown and Orangetown were estimated to have the largest increases and highest median incomes in the County, with median incomes of \$102,326, \$102,065 and \$91,618, respectively. The Towns of Ramapo and Haverstraw, with median incomes of \$69,635 and \$71,512, had the lowest

median incomes in the County in 2011. At the same time, all but one (1) of the County's five (5) towns experienced an increase in the number of people living below the poverty line. The poverty rate decreased slightly for Stony Point between 2000 and 2011, while it increased by 3.30 percent in Ramapo during the same period of time. The Town of Haverstraw experienced the second highest increase of poverty rate, with an increase of one percent.

All of the 12 Villages in Rockland County, with the exception of the Village of Nyack in the Town of Orangetown, demonstrated an increase in median income between 2000 and 2011. Within the Town of Ramapo, median household income increases between 2000 and 2011 ranged from 13.6 percent in the Village of Airmont to 99.5 percent in the Village of New Square, which posted the highest increase in Rockland County. The Villages of New Square (99.5%), Hillburn (53.5%), Pomona (52.3%) and Kaser (51.3%) experienced the most significant increases in median income. The poverty rate decreased in six (6) villages in Ramapo, with changes in the poverty rate ranging from -14.9 percent in the Village of New Square and 4.2 percent in the Village of Airmont. Within the Town of Clarkstown, Upper Nyack experienced a median household increase of 27.3 percent, while the poverty rate increased by 1.2 percent. In the Town of Orangetown, changes in median income ranged from -12.6 percent in the Village of Nyack to 74.2 percent in the Village of South Nyack while changes in poverty rates ranged from a 4.2 percent increase in the Village of Grand View and a 4.6 percent decrease in the Village of Piermont. In the Town of Haverstraw, the Village of Haverstraw experienced an increase in median household income of 18.3 percent and the poverty rate dropped slightly, while the Village of West Haverstraw experienced a nearly 60 percent increase in median household income and a reduced poverty rate of 1.7 percent.

Table 3.5 demonstrates that the most significant increases in median income in the County's Census Designated Places occurred in Thiells in the Town of Haverstraw (51.3%), Stony Point in the Town of Stony Point (43.0%) and Hillcrest in the Town of Ramapo (42.5%). Monsey in the Town of Ramapo experienced a decrease in median income, while the remaining Census Designated Places experienced a mild to moderate increase. The most significant changes in poverty occurred in Orangeburg in the Town of Orangetown (17.8% increase) and Monsey (12.2% increase) and Viola (13.8% increase) in the Town of Ramapo. Six (6) Census Designated Places in Clarkstown, Orangetown and Haverstraw experienced a mild to moderate decrease in poverty rate.

Table 3.5 – Change in Median Income and Poverty Rate by CDP (2000 – 2011)

Census Designated Places (CDP)			
CDP	2000	2011	% Change 2000-2011

	Median Income (\$)	Poverty Rate (%)	Median Income (\$)	Poverty Rate (%)	Median Income	Poverty Rate
Ramapo						
Hillcrest	68,889	8.1	98,134	8.2	42.5%	0.10%
Monsey	45,194	30.6	35,964	42.8	-20.4%	12.20%
Viola	59,821	6.5	64,118	20.3	7.2%	13.80%
Clarkstown						
Bardonia	96,068	1.4	118,723	1.8	23.6%	0.40%
Congers	79,493	2.9	103,574	5.6	30.3%	2.70%
Nanuet	71,178	5.2	84,658	7.4	18.9%	2.20%
New City	92,261	2.8	115,230	2.3	24.9%	-0.50%
Valley Cottage	75,828	2.7	92,257	4.5	21.7%	1.80%
West Nyack	98,931	2.6	108,542	1.0	9.7%	-1.60%
Orangetown						
Blauvelt	87,071	3.5	118,098	1.0	35.6%	-2.50%
Orangeburg	57,000	5.6	57,083	23.4	0.1%	17.80%
Pearl River	76,692	3.4	98,443	1.3	28.4%	-2.10%
Sparkill	N/A	N/A	56,000	6.0	N/A	N/A
Tappan	86,435	3.3	120,000	0.9	38.8%	-2.40%
Haverstraw						
Mount Ivy	51,935	8.0	67,675	14.6	30.3%	6.60%
Thiells	79,906	4.5	120,909	4.1	51.3%	-0.40%
Stony Point						
Stony Point	71,017	3.6	101,536	3.8	43.0%	0.20%

Data Source: 2000 Census, 2007-2011 American Community Survey

B. DEMOGRAPHIC PROFILE – PROTECTED CLASSES

As outlined in more detail in Section 5, the Federal protected classes are race, color, national origin, religion, sex/gender, disability and familial status. The protected classes recognized by New York State law include the above populations as well as age, sexual orientation, marital status, military status and creed. Protected classes recognized by Rockland County are the same as outlined in New York State law, with the exception of military status. This section assesses the demographic characteristics of the protected classes. Some protected classes are assessed as part of one or more other protected class. For instance, marital and familial status are addressed in the same analysis, along with an assessment on the impact of sex/gender and familial status. Color is a protected class measured within both national origin and race. Creed and religion are also addressed together.

i. National Origin

a. Demographic Trends

There are significant demographic shifts occurring in Rockland County in terms of ancestry, region of birth and language spoken at home.

Ancestry

Although Rockland County experienced a moderate population loss in persons reporting English, German, Italian and Russian heritage between 2000 and 2013, the number of people reporting Eastern European heritage (50.5%), European heritage (418.3%), Hungarian heritage (147%), Polish heritage (11.2%) and West Indian heritage (35.3%) increased significantly – see Table 3.6. All ancestries not listed in the County's ancestry tables because too few people identified with them are grouped by the Census Bureau under "Other Groups." The number of people reporting a first ancestry that was grouped under "Other Group" increased significantly between 2000 and 2013.

Table 3.6 – Change in Ancestry Reported (2000 – 2013)

Ancestry Reported*	2000		2013		Percent Change**
	Number	Percent	Number	Percent	
Eastern European	2,211	0.8%	3,327	1.1%	50.5%
English	6,369	2.2%	5,773	1.8%	-9.4%
European	2,694	0.9%	13,964	4.4%	418.3%
German	13,260	4.6%	12,973	4.1%	-2.2%
Hungarian	3,069	1.1%	7,579	2.4%	147%
Irish	36,579	12.8%	37,078	11.8%	1.4%
Italian	41,756	14.6%	36,728	11.7%	-12.0%
Polish	9,691	3.4%	10,780	3.4%	11.2%
Russian	10,517	3.7%	8,977	2.8%	-14.6%
West Indian***	14,511	5.1%	19,627	6.2%	35.3%
Other Groups	72,041	25.1%	94,527	30.0%	31.2%

Source: US Census 2000, QT-P16 and 2009-2013 American Community Survey B04001.

*Reflects first ancestry reported.

**Percent change reflects the percentage of change from 2000-2013 for each ancestry.

***Excluding Hispanic origin groups.

Place of Birth

In 2013, there were an estimated 69,191 (17.4%) foreign born persons in Rockland County. This is significantly lower than the foreign born population in the New York MSA as a whole, which was estimated at 30.1 percent in 2013. The MSA population as a whole has a significantly higher proportion of foreign-born persons, resulting in significantly higher percentages of foreign-born persons from each region compared to Rockland County. Table 3.7 provides a summary of the County and New York MSA foreign-born populations.

Nearly two-thirds of the County's foreign-born population were born in Latin America, with the majority coming from the Caribbean region (19,110). The countries most represented in the County's foreign-born population are: Haiti (9,683 persons), India (5,526 persons), Guatemala (5,177 persons), Dominican Republic (5,131 persons) and Ecuador (3,725 persons).

Table 3.7 – Region of Birth – Rockland County and New York MSA (2013)

Region of Birth	Rockland County		New York MSA*	
	Population	Percent	Population	Percent
FOREIGN BORN POPULATION	69,191	17.4%	3,959,574	30.1%
EUROPE	14,276	4.5%	649,791	16.4%
Northern Europe	3,296	1.0%	82,725	2.1%
United Kingdom	1,456	0.5%	47,146	1.2%
Ireland	1,689	0.5%	26,898	0.7%
Western Europe	2,044	0.6%	73,071	1.8%
Germany	1,031	0.3%	34,165	0.9%
Southern Europe	2,726	0.9%	146,074	3.7%
Italy	1,785	0.6%	88,926	2.2%
Eastern Europe	6,185	2.0%	346,46	8.7%
Poland	1,292	0.4%	70,225	1.8%
Russia	1,202	0.4%	78,630	2.0%
ASIA	16,584	5.3%	1,056,404	26.7%
Eastern Asia	3,149	1.0%	506,872	12.8%
China**	1,860	0.6%	389,616	9.8%
Korea	1,212	0.4%	89,717	2.3%
South Central Asia	6,469	2.1%	133,720	3.4%
India	5,526	1.8%	127,504	3.2%
South Eastern Asia	4,403	1.4%	133,720	3.4%
Philippines	3,499	1.1%	80,362	2.0%
Western Asia	2,529	0.8%	93,171	2.4%
Israel	1,535	0.5%	30,399	0.8%
AFRICA	1,364	0.4%	149,884	3.8%
LATIN AMERICA	35,752	11.3%	2,061,356	52.1%
Caribbean	19,110	6.1%	1,023,676	25.9%
Dominican Republic	5,131	1.6%	436,065	11.0%
Haiti	9,683	3.1%	127,381	3.2%
Jamaica	2,933	0.9%	220,855	5.6%
Central America	10,470	3.3%	486,746	12.3%
Mexico	2,218	0.7%	232,549	5.9%
El Salvador	2,402	0.8%	106,963	1.2%
Guatemala	5,177	1.6%	53,745	1.4%
South America	6,172	2.0%	550,934	13.9%
Ecuador	3,725	1.2%	171,472	4.3%
NORTH AMERICA	1,063	0.3%	31,973	0.8%
Canada	1,051	0.3%	31,351	0.8%

Source: 2009-2013 American Community Survey (B05006)

*The New York MSA is officially referred by the U.S. Census Bureau as: New York-Newark-Jersey City, NY-NJ-PA Metro (part); New York.

**Includes Hong Kong and Taiwan

Note: Percent reflects percentage of the population as a whole and categories chosen are comprised of at least 1,000 individuals in Rockland County.

According to *American Community Survey* estimates, the County's foreign born population increased by approximately 14,425 (26.3 percent) between 2000 and 2013. Among regions that represent at least 3,000 persons within the County, the most significant changes from

2000 and 2013 are in the Latin American and Asian regions of birth. The Latin American born population increased by 11,790 (49.2%) while the Asian born population increased by 2,311 (16.2%). The increase within the Asian born population is most evident in the increase of South Central Asian born people (1,816), which in turn is driven by a significant increase of Indian born people (2,071). Within the Latin American region, the most significant increases occurred in the Caribbean born population, which experienced an influx of 4,179 (28.0% increase) and the Central American born population, which increased by 5,040 (92.8% increase). There were significant increases in the foreign-born population from the countries of El Salvador (1,357), Haiti (1,466), the Dominican Republic (1,544), India (2,071), Ecuador (2,287) and Guatemala (3,304). The foreign-born populations demonstrating the fastest growth in terms of percent increase between 2000 and 2013 are El Salvador (129.9% increase), Ecuador (159.0% increase) and Guatemala (176.4% increase). Table 3.8 shows the change in region of birth for Rockland County from 2000-2013.

Table 3.8 –Change in Region of Birth (2000-2013)

Region of Birth*	2000		2013		Population Change	Percent Change
	Population	Percent	Population	Percent		
FOREIGN BORN POPULATION	54,766	19.1%	69,191	22.0%	14,425	26.3%
EUROPE	14,472	26.4%	14,276	4.5%	-196	-1.4%
Northern Europe	3,274	6.0%	3,296	1.0%	22	0.7%
United Kingdom	1,340	2.4%	1,456	0.5%	116	8.7%
Ireland	1,685	3.1%	1,689	0.5%	4	0.2
Western Europe	2,773	5.1%	2,044	0.6%	-729	-26.3%
Germany	1,651	3.0%	1,031	0.3%	-620	-37.6%
Southern Europe	2,755	5.0%	2,726	0.9%	-29	-1.1%
Italy	2,102	3.8%	1,785	0.6%	-317	-15.1%
Eastern Europe	5,661	10.3%	6,185	2.0%	524	9.3%
Poland	1,399	2.6%	1,292	0.4%	-107	-7.6%
Russia	1,373	2.5%	1,202	0.4%	-171	-12.5%
ASIA	14,273	26.1	16,584	5.3%	2,311	16.2%
Eastern Asia	3,111	5.7%	3,149	1.0%	38	1.2%
China*	1,362	2.5%	1,860	0.6%	498	36.6%
Korea	1,458	2.7%	1,212	0.4%	-246	-16.9%
South Central Asia	4,653	8.5%	6,469	9.3%	1,816	39.0%
India	3,455	6.3%	5,526	1.8%	2,071	59.9%
South Eastern Asia	4,510	8.2%	4,403	1.4%	-107	-2.4%
Philippines	3,729	6.8%	3,499	1.1%	-230	-6.2%
Western Asia	1,961	3.6%	2,529	0.8%	568	29.0%
Israel	1,312	2.4%	1,535	0.5%	223	17.0%
AFRICA	1,221	2.2%	1,364	0.4%	143	11.7%
LATIN AMERICA	23,962	43.8%	35,752	11.3%	11,790	49.2%
Caribbean	14,931	27.3%	19,110	6.1%	4,179	28.0%
Dominican Republic	3,587	6.5%	5,131	1.6%	1,544	43.0%
Haiti	8,217	15.0%	9,683	3.1%	1,466	17.8%

Jamaica	2,130	3.9%	2,933	0.9%	803	37.7%
Central America	5,430	9.9%	10,470	3.3%	5,040	92.8%
Mexico	2,093	3.8%	2,218	0.7%	125	6.0%
El Salvador	1,045	1.9%	2,402	0.8%	1,357	129.9%
Guatemala	1,873	3.4%	5,177	1.6%	3,304	176.4%
South America	3,601	6.6%	6,172	2.0%	2,571	71.4%
Ecuador	1,438	2.6%	3,725	1.2%	2,287	159.0%
NORTH AMERICA	767	1.4%	1,063	0.3%	296	38.6%
Canada	752	1.4%	1,051	0.3%	299	39.8%

Source: 2000 Census and 2009-2013 American Community Survey (B05006)

*Includes Hong Kong and Taiwan

Note: Percent reflects percentage of the population as a whole and categories chosen are comprised of at least 1,000 individuals in Rockland County.

In 2013, an estimated 55.3 percent of the County's foreign born population were naturalized citizens; this rate is slightly higher than the MSA-wide rate of 52.6 percent. According to 2009-2013 American Community Survey estimates, the percentage of the County's naturalized foreign-born European and Asian populations are moderately higher than in the New York MSA (see Table 3.9). In contrast, the County's percentage of naturalized Latin Americans (40.7%) is lower than in the New York MSA (47.1%). Within the County's Latin American population, the foreign-born Central American and South American populations have significantly lower percentages of naturalized citizens than the New York MSA as a whole (see Table 3.9).

Table 3.9: Percent of Naturalized Citizens by Region of Birth (2013)

Region of Birth	Rockland County	New York MSA*
	Percent Naturalized	Percent Naturalized
TOTAL	55.3%	52.6%
Europe	73.4%	66.9%
Asia	71.3%	56.0%
Latin America	40.7%	47.1%
Caribbean	56.5%	56.1%
Central America	14.5%	22.9%
Mexico	23.9%	11.3%
South America	36.2%	51.7%

Source: 2009-2013 American Community Survey (B05007).

*The New York MSA is officially referred by the U.S. Census Bureau as: New York-Newark-Jersey City, NY-NJ-PA Metro (part); New York.

Note: Percent represents percentage of immigrant population that is naturalized.

A large portion of the County's foreign-born population entered the country before 1990 (44.1%), between 1990 and 1999 (25.2%) and between 2000 and 2009 (27.2%).

Language

In 2013, an estimated 37.3 percent of Rockland County residents ages 5 and over spoke a language other than English at home (slightly less than the New York MSA average of 40.3 percent). The most commonly used languages in Rockland County are: other Indo-European languages (18.5 percent) and Spanish/Spanish Creole (13.0 percent). Rockland has a significantly lower ratio of Spanish speaking residents compared with the New York MSA (20.4%) and higher proportion of residents who speak other Indo-European languages than the New York MSA (11.5%).

HUD uses the prevalence of persons with Limited English Proficiency (LEP) to identify the potential for impediments to fair housing choice due to their inability to comprehend English. HUD entitlement communities are required to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964. In 2013, an estimated 47,944 persons in Rockland County spoke English less than “very well,” representing 16.5 percent of the County’s population among persons ages 5 and above (*2009-2013 American Community Survey*). Spanish/Spanish Creole (38.4%), Yiddish (25.7%) and French Creole (11.8%) speakers who spoke English less than “very well” made up the majority (75.9%) of all speakers with Limited English Proficiency (LEP) in Rockland County. The spoken language of the remaining 24.1 percent of the County’s LEP speakers is dispersed among over 30 LEP language groups (see Table 3.10).

Table 3.10 – Limited English Proficiency (LEP) Language Groups (2013)

	Total*	Percent of Total Population
Total LEP Persons	47,944	16.5%
Spanish/Spanish Creole	18,404	6.3%
Yiddish	12,311	4.2%
French Creole	5,654	1.9%

Source: *2009-2013 American Community Survey* (B16001)

*Total reflects population age 5 and above

b. National Origin and Income

It is illegal for housing providers to discriminate based on place of birth or ancestry. As cited above, an estimated 22 percent of Rockland County residents were foreign-born in 2013 (*2009-2013 American Community Survey*). More than one out of every two of the County’s foreign-born residents are from Latin America, with an additional quarter of the County’s foreign-born residents comprised of people from Asia. Approximately one out of every five of the County’s foreign-born residents are from Europe. The ratio of the County’s foreign-born residents under the poverty level in 2013 was estimated to be lower (13.6%) than the number of native-born residents under the poverty level (15.2%). Within the foreign-born group, nationalized citizens were less likely to experience poverty (6.5%) than foreign-born residents who are not citizens (22.6%). With a poverty rate of 22.6%, foreign-born residents in Rockland County who are not citizens are significantly more likely to experience poverty than nationalized citizens and native-born residents.

ii. Race and Ethnicity

a. Demographic Trends

Overall, the ethnic and racial composition in Rockland County differs from that found in the New York MSA. As a percent of population, the County has a larger White population and a smaller minority population than the County as a whole – see Table 3.11.

Table 3.11 – Racial/Ethnic Composition of Rockland County and the New York MSA (2013)

	Total Population	White	Racial Minority Population				Total	Hispanic
			Black/African American	Asian	Two+ Races	*All other Races		
Rockland County	315,069	227,418	38,953	19,952	5,568	23,178	87,651	50,598
		72.2%	12.4%	6.3%	1.8%	7.4%	27.8%	16.1%
New York MSA**	13,150,924	7,322,808	2,562,744	1,332,462	371,963	1,560,947	5,828,116	3,202,795
		55.7%	19.5%	10.1%	2.8%	11.9%	44.3%	24.4%

Source: 2000 Census (DP-01) and 2013 American Community Survey (DP-05), U.S. Census Bureau.

*Represents "Some Other Race," Native Hawaiian and Other Pacific Islander" and "American Indian and Alaska Native" demographic groups.

**The New York MSA is officially referred by the U.S. Census Bureau as: New York-Newark-Jersey City, NY-NJ-PA Metro (part); New York.

The overall distribution of the County's population by race has shifted between 2000 and 2013. Between 2000 and 2013, the ratio of White people is estimated to have decreased by the same amount that the ratio of the racial minority population increased (4.7%). As a percentage of the overall population, the All Other Races racial minority category experienced the biggest change between 2000 and 2013, from 4.1 percent to 7.4 percent of the population. The ratio of Hispanic/Latino persons in Rockland County increased by nearly six percentage points between 2000 and 2013.

Although the proportion of White people in Rockland County decreased from 2000 to 2013, the number of White people in Rockland County increased by 3.1 percent. This is because the County's population increased significantly (31.2%) during the same period, which has contributed to a significant increase in nearly every population category. The Two+ Races category is the only racial minority population that saw a decrease, both in the percentage of the population and the number of people. The Hispanic population increased by 73.3 percent to 50,598 from 2000 to 2013. In terms of racial minority, the All Other Races population experienced a significant increase (97.8%), the Black/African American (23.8%) and Asian (26.1%) populations experienced a moderate increase and the White population experienced a small increase (3.1%). Overall, the minority population increased by 32.4 percent or 21,436 compared with the White population, which increased by 6,880 (3.1% - see Table 3.12 and Maps 3.3 and 3.4).

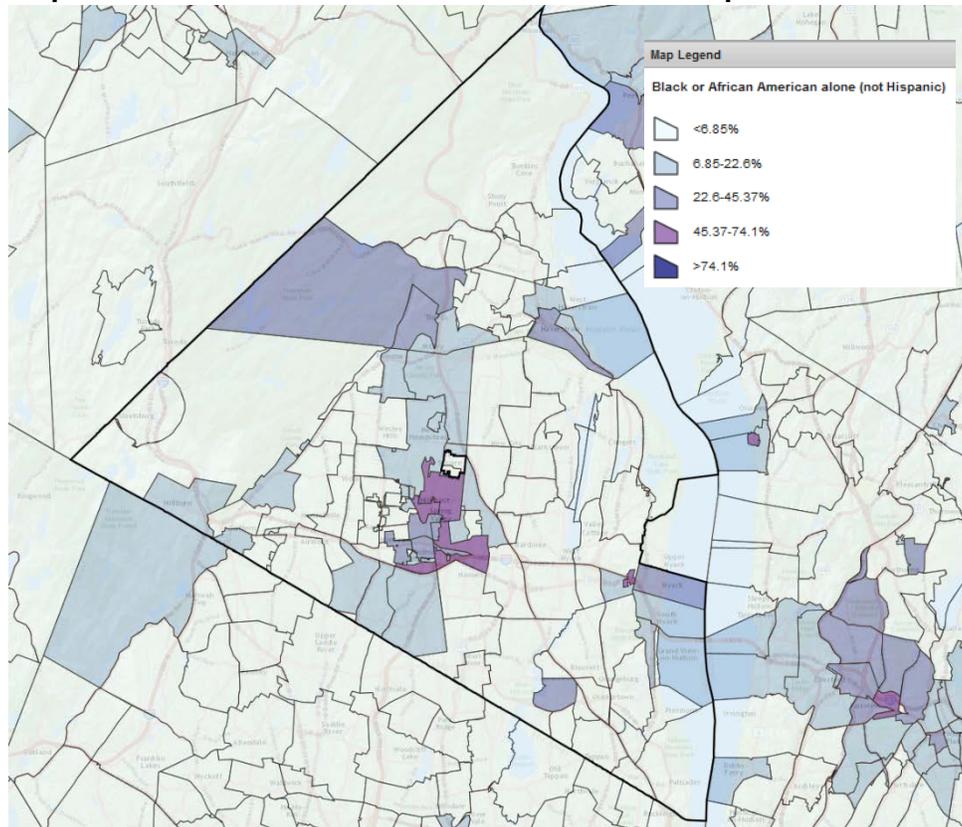
Table 3.12 – Racial/Ethnic Composition of Rockland County (2000-2013)

	Total Population	White	Racial Minority Population				Hispanic	
			Black/African American	Asian	Two+ Races	*All other Races		Total
2000								
Rockland County	286,753	220,538	31,472	15,826	7,198	11,719	66,215	29,189
		76.9%	11.0%	5.5%	2.5%	4.1%	23.1%	10.2%
2013								
Rockland County	315,069	227,418	38,953	19,952	5,568	23,178	87,651	50,598
		72.2%	12.4%	6.3%	1.8%	7.4%	27.8%	16.1%
Percent Change								
Rockland County	13,150,924	6,880	7,481	4126	-1,630	11,459	21,436	21,409
		3.1%	23.8%	26.1%	-22.6%	97.8%	32.4%	73.3%

Source: 2000 Census (DP-01) and 2013 American Community Survey (DP-05), U.S. Census Bureau.

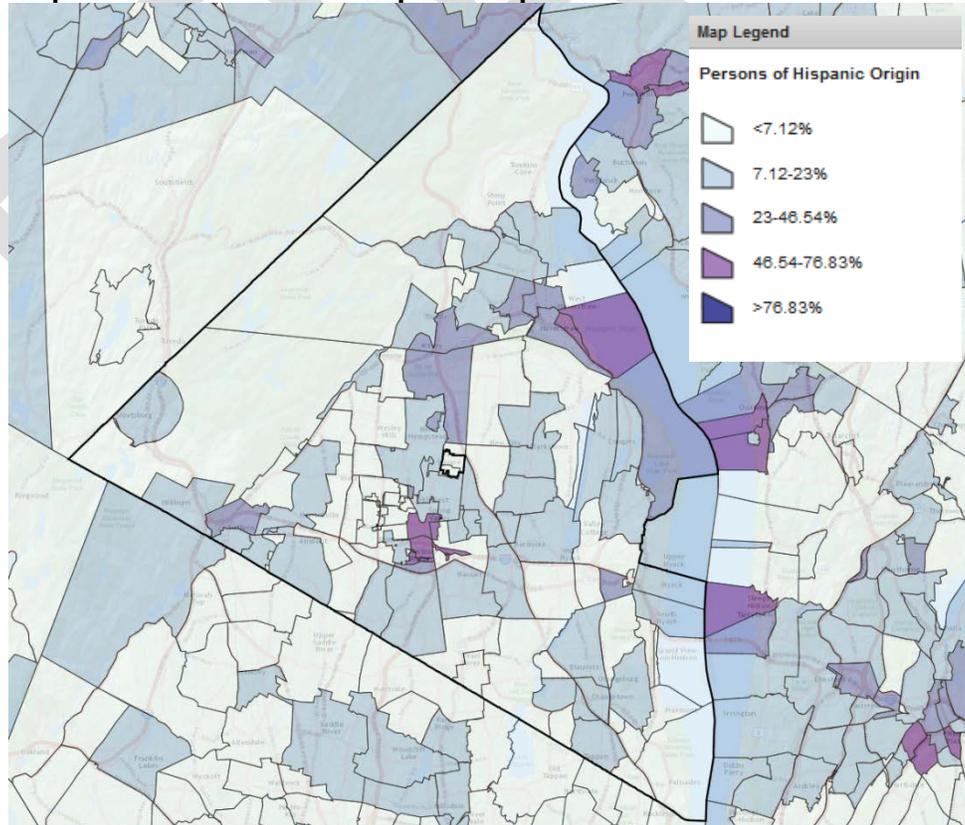
*Represents "Some Other Race," Native Hawaiian and Other Pacific Islander" and "American Indian and Alaska Native" demographic groups.

Map 3.3 - Distribution of Black/African American Population



Source: U.S. Department of Housing and Urban Development, CPD Maps, 2015

Map 3.3 - Distribution of Hispanic Population



Source: U.S. Department of Housing and Urban Development, CPD Maps, 2015

b. Race/Ethnicity and Income

The median household income over the past 12 months for Rockland County households, at \$84,951, is approximately 35 percent higher than the median income for households in the New York MSA (\$62,878). This translates into significantly higher median household incomes across all racial/ethnic groups in the County compared with the New York MSA as a whole. The three largest ethnic/racial demographic groups in Rockland County are White, Hispanic and Black/African American. Within this group, the White demographic has the highest median income and the Black/African American demographic group has a median household income rate that is 23.6 percent lower than the White median income. However, the poverty rate for the White demographic group is higher than for the Black/African American demographic group. The Hispanic demographic has the lowest median income and highest poverty rate, although rates for all demographic groups are much higher than in the New York MSA. Table 3.13 portrays the estimated median household income and poverty rate for both Rockland County and the New York MSA in 2013.

Table 3.13 – Median Household Income and Poverty Rate by Race/Ethnicity

	Median Household Income	Poverty Rate
Rockland County	84,951	8.3%
White	86,327	14.0%
Black/African American	69,854	10.4%
Asian	125,130	3.8%
Two+ Races	93,529	9.4%
Some Other Race	58,225	24.3%
Hispanic	64,168	18.4%
New York MSA*	62,878	N/A**
White	76,872	N/A
Black/African American	44,810	N/A
Asian	63,487	N/A
Two+ Races	51,782	N/A
Some Other Race	37,248	N/A
Hispanic	41,304	N/A

Source: 2009-2013 American Community Survey (B19013, B17001, S1903 and S1701).

*The New York MSA is officially referred by the U.S. Census Bureau as: New York-Newark-Jersey City, NY-NJ-PA Metro (part); New York.

**Poverty rates are not available at the Metropolitan Statistical Area level.

In 2013, unemployment rates in Rockland County (8.3%) were significantly lower than for New York State as a whole (16.0%). In both the New York MSA and Rockland County, women experienced unemployment at lower rates than men, though women had a lower labor force participation rate than men overall. Black/African American and Hispanic residents were more likely to be unemployed than White Residents, with unemployment rates of 13.0 percent and 10.6 percent respectively, compared with the White rate of 7.3 percent. Overall, the unemployment rates for Rockland County residents in all categories are lower than the unemployment rates for the New York MSA (see Table 3.14).

Table 3.14 – Unemployment Rates – Rockland County and New York MSA (2013)

Civilian Labor Force	New York		Rockland County	
	Total*	%	Total*	%
Total (Age 16+)	15,717,283	---	237,158	---
Employed		57.7		60.4%
Unemployed		9.2		8.3%
Male (20-64 years)	5,835,558		86,321	
Employed		73.8		78.8%
Unemployed		9.1		8.2%
Female (20-64 years)	6,101,080		88,343	
Employed		66.8		69.6%
Unemployed		8.2		6.6%
White	10,529,015		170,591	
Employed		58.8		58.6%
Unemployed		7.6		7.3%
Black/African American	2,387,838		30,361	
Employed		52.5		61.8%
Unemployed		14.6		13.0%
Asian	1,216,680		15,907	
Employed		58.6		66.4%
Unemployed		8.1		5.8%
Some Other Race	1,202,319		15,801	
Employed		57.6		70.5%
Unemployed		12.6		11.6%
Hispanic	2,615,526		36,606	
Employed		56.8		66.2%
Unemployed		11.9		10.6%

Data Source: 2009-2013 American Community Survey (S2301)

* Entire population, including those not in the labor force.

iii. Creed/Religion

The Rockland County Fair Housing Law defines creed as a formal statement of beliefs, principles or opinions, including but not limited to religion. The U.S. Census Bureau does not collect data on religious affiliation in its demographic surveys or decennial census, as Public Law 94-5421 prohibits asking a question on religious affiliation on a mandatory basis. As such, this analysis incorporates data from the Association of Religion Data Archives (ARDA), as outlined in the County's 2011 Comprehensive Plan.

The two largest religious "traditions" in Rockland County are Judaism and Catholic, with adherents to both religions accounting for more than 80 percent of the total number of adherents in Rockland County. The remaining adherents are distributed among over 30 different congregations and over 15 religious "families" (i.e. Pentecostal, Eastern Liturgical Orthodox and Baptist). In 2000, according to ARDA, 126,060 residents were adherent to the Roman Catholic Church, while an estimated 90,000 County residents were adherent to the Jewish faith in any form. Jewish adherent numbers are estimates based on limited data sources and may not be accurate but are included to provide a snapshot of people who

practice Judaism in the County. In 2010, the number of adherents in the Catholic Church decreased to 109,386 while the number of adherents to a religious body under Judaism numbered approximately 63,669.²

Nearly one third of Rockland County's residents are Jewish, or roughly 100,000 persons today, and the County may have the highest Jewish population per capita of any County in the U.S.³ The Villages of New Square, Kaser, New Hempstead, Wesley Hills and the hamlet of Monsey comprise major centers of Jewish culture.

iv. Age

a. Demographic Trends

According to *2009-2013 American Community Survey* estimates, approximately 14 percent of the County's population is aged 65 and over, compared with 12.5 percent for the New York MSA. The median age of Rockland County is 36.4, compared with 37.1 for the New York MSA.

The 20-24 and 65 and over age groups demonstrate the most significant changes from 2000 to 2013 in terms of percentage increase – see Table 3.15. While the increase in population for almost all of the age groups corresponds to the County's overall population increase during this period of time, the age 45 – 64 demographic group experienced a population loss of 7,013 (8.7 percent decrease). The age 65 and over demographic group increased by 9,886 and represents 13.9 percent of the County's population, up from 11.8 percent in 2000.

Table 3.15 –Change in Age (2000-2013)

Age	2000		2013		Population Change	Percent Change
	Population	Percent	Population	Percent		
Age 0 - 5	21,807	7.6%	23,883	7.6%	2,076	9.5%
Age 5 - 19	65,532	22.9%	72,783	23.1%	7,251	11.1%
Age 20 - 24	15,623	5.4%	19,805	6.3%	4,192	26.9%
Age 25 - 44	80,227	28.0%	73,214	23.2%	-7,013	-8.7%
Age 45 - 64	69,711	24.3%	81,645	25.9%	11,934	17.1%
Age 65 and Over	33,853	11.8%	43,739	13.9%	9,886	29.2%

Source: 2009-2013 American Community Survey (DP-05).

According to *2009-2013 American Community Survey* estimates, almost one out of every three noninstitutionalized persons above the age of 65 has one or more disabilities. Disability is further discussed in Section v, below.

² Association of Statisticians of American Religious Bodies (ASARB), *2010 Religion Census: Religious Congregations & Membership Study*, available at the Association of Religion Data Archives (ARDA) website: www.thearda.com.

³ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, March 1, 2011.

b. Age and Income

Almost 50 percent of disabled persons in the County are 65 years of age or older (see discussion below). Nearly one out of every two (45.5%) householders 65 years of age or older was estimated to earn less than 50,000 in 2013, compared with persons ages 44 and below (31.6%) and persons ages 45-64 (18.6%). Table 3.16 demonstrates that the estimated income of persons ages 65+ in 2013 is significantly lower than that of persons 64 and under.

Table 3.16 – Age and Income of Householder (2013)

	Age: >44		Age: 45-64		Age: 65+	
	Total	Percentage	Total	Percentage	Total	Percentage
Less than \$15,000	1,706	8.1%	1,711	5.3%	2,109	9.9%
\$15,000 – \$34,999	3,259	15.4%	2,355	7.3%	4,953	23.3%
\$35,000 – \$49,999	1,719	8.1%	1,925	6.0%	2,634	12.4%
\$50,000 - \$74,999	2,605	12.3%	3,860	12.0%	3,717	17.5%
\$75,000+	11,853	56.1%	22,285	69.3%	7,879	37.0%
Total	21,142	100.0%	32,136	100.0%	21,292	100.0%

Source: 2009-2013 American Community Survey (B19037A).

v. Disability

A disability is defined by the Census Bureau as a long-lasting physical, mental or emotional condition that can make it difficult for a person to perform activities such as walking, climbing stairs, dressing, bathing, learning or remembering. A disability can also impede a person from being able to go outside independently or to be employed.

The Fair Housing Act was adopted in 1968 and was further strengthened with amendments in 1988. The Fair Housing Act prohibits discrimination based on physical, mental or emotional disability, as long as reasonable accommodations can be made. Reasonable accommodations can include adaptive structural changes to interiors and exteriors of dwellings and common use areas or administrative changes.

a. Demographic Trends

In 2013, nine (9) percent of the County's total noninstitutionalized population age 5 and above were estimated to have a disability (*2009-2013 American Community Survey*). This rate is slightly lower than the New York MSA's rate of 10.5 percent. More than 50 percent of the County's noninstitutionalized disabled population have an ambulatory difficulty, more than 40 (41.7%) percent have an independent living difficulty and almost 40 percent (36.4%) have a cognitive difficulty. Almost 50 percent (47.7%) of noninstitutionalized disabled persons over five years of age in the County are 65 years of age or older.

b. Disability and Income

According to a study issued by the National Disability Rights Network (NDRN) in 2011, there is a lack of employment opportunities for people with disabilities and an ongoing problem of

disabled persons being placed in segregated/sheltered employment settings performing jobs that pay less than the minimum wage (*Segregated and Exploited*). An estimated 16.2 percent of the disabled population over 5 years of age in Rockland County was estimated to live below the poverty level in 2013 (*2011-2013 American Community Survey*). In contrast, 13.0 percent of the non-disabled population in the County was estimated to live below the poverty level in 2013.

vi. Familial and Marital Status

a. Demographic Trends

The New York State Human Rights Law defines family as a person or two or more people occupying a dwelling, living together and maintaining a household, which differs from the definition of family established by the Census Bureau. The Census Bureau defines family households as a group of two people of more related by birth, marriage or adoption and residing together. Except in certain circumstances (e.g. elderly housing and owner-occupied units of one to four units), Title VIII of the Civil Rights Act of 1968 and 1988 amendments make it unlawful to refuse to rent or sell to families with children.

In 2000, 1.1 percent of the County's households were comprised of unmarried partners. According to *2009-2013 American Community Survey* estimates, households with unmarried partners of the same sex accounted for 0.4 percent of the total households while households with unmarried partners of the opposite sex accounted for 3.7 percent of all households in the County.

While the portion of family households in the County decreased from 63.7 percent in 2000 to 61.0 percent in 2013, the percentage of married couple households decreased while the percentage of female-headed and male-headed households increased slightly – see Table 3.17. Overall, while the number of households grew 6.1 percent, the distribution of family households shifted by only 0.1 – 1.4 percent within the types of households. In 2013, the average family size was estimated at 3.64 and was larger in married-couple families (3.80) than in other types of families.

Table 3.17: Types of Households (2000-2013)

Total HH	Family Households										Non-Family and 1-Person HH
	Family HH (% - All HH's)	Married Couple Households			Female-Headed Households			Male-Headed Households			
		% of Total	With Children	Without Children	% of Total	With Children	Without Children	% of Total	With Children	Without Children	
2000											
92,675	77.1%	63.7%	31.7%	32.0%	10.3%	5.0%	5.1%	3.4%	1.3%	2.2%	22.9%
2013											
98,326	75.7%	61.0%	30.2%	30.7%	10.4%	5.0%	5.4%	4.3%	1.9%	2.4%	24.3%

Source: 2000 Census (DP-01) and *2009-2013 American Community Survey* (S1101), U.S. Census Bureau.

Note: Percentages represent percentage of total households.

b. Household/Family Composition and Income

Families with children in Rockland County are much more likely to live in poverty than families without children. In 2013, there were 5,910 households in Rockland County with related children under the age of 18 living below the poverty line (*2009-2013 American Community Survey*). Although they only comprised 5.0 percent of families in the County in 2013, female-headed households with children accounted for nearly one out of every five families living in poverty. However, married couples with children represent the majority of families living under the poverty line. Almost three-quarters (71.9%) households with children living in poverty in 2013 were comprised of married-couple families (*2009-2013 American Community Survey*, B17010, B11003).

vii. Military Status

The New York State Human Rights Law defines military status as “a person’s participation in the military service of the United States or the military service of the state, including but not limited to the armed forces of the United States, the Army, the National Guard, the Air National Guard, the New York Naval Militia, the New York Guard and such additional forces as may be created by the Federal or State government as authorized by law.”⁴ There are currently no datasets that provide information on the number of people on active duty (Federal or State) on the County level.

C. HOUSING PROFILE

i. Housing Stock

Rockland County largely consists of suburban developments, punctuated by a few higher density villages. Between 2000 and 2011 the population of Rockland County grew by 7 percent to 299,975 persons while the number of households grew by 5 percent to 96,162 households. In 2013 the number of new housing units permitted reached pre-recession levels; however the composition of the types of new units being developed has drastically changed (see Table 3.18). In 2008 only 24.3 percent of all new housing units were in multi-family buildings (2+ units), while in 2014 multi-family units now comprise 76.2 percent of the new housing stock permits. This trend is fueled by the changing demographics of the County, with an aging population and the coming predominance of the millennial generation in the home buying market. These groups are now demanding down-town living with top-chef restaurants, easy access to rapid transit and solid municipal services – with affordable tax bills.

⁴ New York State, Human Rights Law.

Table 3.18 - New Housing Permits Issued (2008 – 2015)

	Rockland County			
	Total (Units)	% Change	Multi-Family (Units)	% Total
2014	433	16.4	330	76.2
2013	372	58.3	273	73.4
2012	235	20.5	165	70.2
2011	195	-33.4	102	52.3
2010	293	83.1	195	66.6
2009	160	-52.7	81	50.6
2008	338	--	82	24.3

Source: State of Cities Data Systems (SOCDS), 2015.

ii. Types of Housing Units

Approximately two thirds (67%) of the 101,353 housing units in Rockland County are either single-family detached or single-family attached. Multifamily units, consisting of two or more units, consist of 32 percent of the housing stock and mobile home, boat, RV, or vans are the remaining 1 percent of units. Residential properties consisting of 20 or more units comprise only 7 percent of the total number of housing units in the County.

Of the 96,162 occupied housing units in the County, 71 percent are owner-occupied, with 28 percent being renter occupied (Table 3.14). The County has a housing vacancy rate of 5.1 percent. The vast majority (83%) of owner occupied housing units consists of 3 or more bedroom units with only five percent of all owner housing units consisting of one bedroom or less. By comparison, rental housing units are much more evenly distributed among one, two, and three or more bedroom units.

Table 3.19 – Residential Properties by Unit Number (2011)

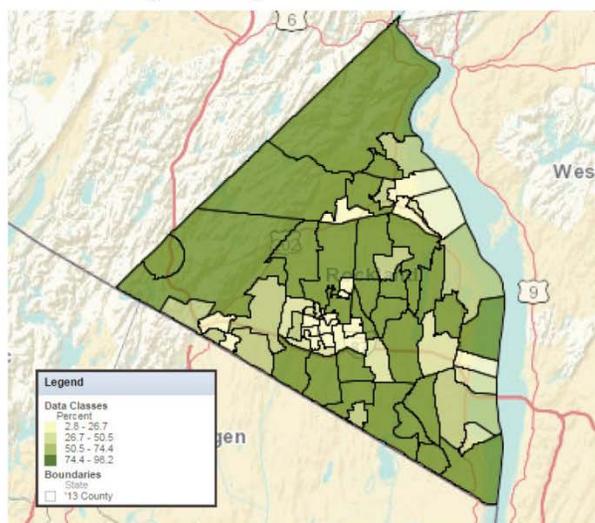
Property Type	Number	%
1-unit detached structure	60,860	60%
1-unit, attached structure	7,538	7%
2-4 units	14,279	14%
5-19 units	10,088	10%
20 or more units	7,219	7%
Mobile Home, boat, RV, van, etc	1,369	1%
Total	101,353	100%

Data Source: 2007-2011 ACS

While single family units are the most common type of housing structure available in the County, the proportion of single family and multifamily homes fluctuates significantly for each Census Tract, with the majority demonstrating single family home ratios between 74.4 and 98.2 percent. Single family detached units comprised equal to or less than 25 percent of the housing stock in fifteen (15) Census Tracts, with Census Tract 124.01 in the Village of Spring Valley having the fewest single-family detached units at 2.3 percent. The higher

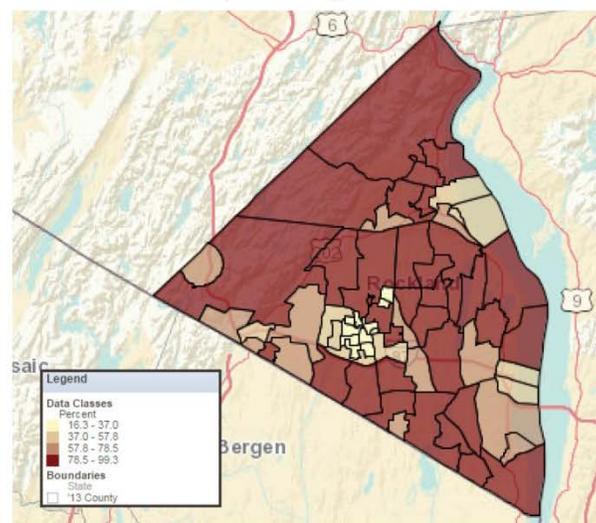
concentrations of multi-family units are located in the County's Villages including Spring Valley, Kaser, Haverstraw and Nyack.

Percent Single Family Detached



Source: U.S. Census Bureau, 2009-2011 5-Year American Community Survey

Percent Ownership Housing



Source: U.S. Census Bureau, 2009-2011 5-Year American Community Survey

According to 2007-2011 ACS data, the County's total occupied housing inventory of 96,162 units is 71.2 percent owner-occupied and 28.8 percent renter-occupied (see Table 3-14). The ownership rate fluctuates significantly across the County's Census Tracts, ranging from 16.3 percent to 99.3 percent. Of the owner-occupied units, 90.3 percent are in single family homes, 8.5 percent are in multifamily structures and the remaining are in mobile homes, boats, RVs, vans or other. For Census purposes, the multi-family ownership category includes condominiums as well as co-op apartments which are not technically "owned", as purchasers instead buy shares of a co-op corporation that owns the entire structure. Co-op apartments are generally less expensive than comparable condominiums. However, co-ops present housing concerns in cases where their boards of directors reject prospective purchasers or requests for reasonable accommodation, for discriminatory reasons. Fair housing awareness and education may be lacking among co-op boards, but because both State and Federal law prohibits the denial of housing to anyone on the basis of protected class status, co-op boards may not legally discriminate.

Of the renter-occupied units, the largest portion (70 percent) in multifamily structures with only 28.6 percent in single-family detached or attached housing.

iii. Protected Class Status and Home Ownership

The value in home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that

puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent”⁵

Historically, minorities tend to have lower home ownership rates than Whites. In 2011 in Rockland County, Whites had a homeownership rate of 74.7 percent. By comparison, Blacks/African Americans owned their homes at a rate of 53.3 percent and Hispanics, 48.3 percent. Asians had a home ownership rate of 82.2 percent, the highest of any race or ethnic group, although they represent only 6.1 percent of the County’s population.

Minority home ownership by Census Tract varied widely from a high of 88.6 percent to a low of zero percent. In Census Tracts with overall majority rates of minority households (Tracts 107.01, 113.01, 115.04, 118, 122.02, 123, 124.01 and 124.02) minority ownership rates ranged from a low of 27.8 percent for Black/African American, 11.1 percent for Asian and 20.4 percent for Hispanic households to a high of 67.7 percent for Black/African American, 8.6 percent for Asian and 13.6 percent for Hispanic households. The higher concentrations of minority ownership units are located in the County’s Villages including Spring Valley, Kaser, Haverstraw and Nyack.

As previously noted, median incomes for Hispanics and Blacks/African Americans are significantly lower than those of Whites. This is one of several factors that contributes to the generally lower rates of homeownership for minorities across the County.

iv. Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons who can live together in a single housing unit to prevent overcrowding⁶, and members of the protected classes need more bedrooms to accommodate their larger households, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In 2010, the average household size for Whites was 2.94, compared with 3.23 for Black/African American households and 3.94 for Hispanic households.

Table 3.20 – Unit Size by Tenure (2011)

	Owners		Renters	
	Number	%	Number	%
No bedroom	104	0%	1,372	5%
1 bedroom	3,431	5%	10,555	38%
2 bedrooms	8,134	12%	7,616	28%
3 or more bedrooms	56,797	83%	8,153	29%

⁵ Kathleen C. Engel and Patricia A. McCoy, “From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership,” in *Segregation: The Rising Costs for America*, edited by James H. Carr and Nandinne K. Kutty (New York: Rutledge 2008) p.82.

⁶ Overcrowding is defined as more than one person per room.

	Owners		Renters	
	Number	%	Number	%
Total	68,466	100%	27,696	100%

Data Source: 2007-2011 ACS

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Rockland County, there are fewer options to rent a unit to accommodate large families. Of the 27,696 rental units in the County in 2011, only 29 percent had three or more bedrooms, compared with 83 percent of the owner housing stock.

v. Housing Costs

Proximity to the New York City job market has bolstered high property values in the southern areas of Rockland County in the past decade. Median home prices have been soaring in recent years as home buyers and renters get priced out of other markets, including Westchester County and parts of New Jersey and Connecticut. The 2011 median home value was \$465,100, a 99 percent increase over the 2000 median home values of \$234,300. Contract rents also increased from \$811 in 2000 to \$1,156 in 2011 (a 43% increase).

Rockland County has the highest average median household income (\$84,661) and the highest allowable fair market rental rates in the State of New York. However, while the median home value has dramatically increased over the past decade to \$465,100, Rockland County remains relatively affordable compared with neighboring Westchester County where the average median home value is \$547,000. Median home values vary by community from a high of \$740,800 in parts of the Town of Ramapo and Villages of Montebello, South Nyack and Grand View on Hudson, to a low of \$140,000-\$272,900 in portions of the Village of Spring Valley.

Table 3.21 - Cost of Housing (2000 – 2011)

	Base Year: 2000	Most Recent Year: 2011	% Change
Median Home Value	\$234,300	\$465,100	99%
Median Contract Rent	811	1,156	43%

Data Source: 2000 Census (Base Year), 2007-2011 ACS (Most Recent Year)

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods due to a lack of affordable housing in those areas. In Rockland County, only 43 percent of the 19,683 rental units and 15 percent of the 6,347 ownership units are affordable to households that earn less than 80% HAMFI.

Table 3.22 - Housing Affordability (2011)

% Units affordable to Households earning	Renter	Owner
30% HAMFI	2,625	No Data
50% HAMFI	5,842	968
80% HAMFI	11,216	1,808

% Units affordable to Households earning	Renter	Owner
100% HAMFI	No Data	3,571
Total	19,683	6,347

Data Source: 2007-2011 CHAS

In 2011 Rockland County's Fair Market Rent for a two-bedroom unit was \$1,474, which increased modestly to \$1,481 in 2015. The HUD Fair Market Rents are higher than the County's median contract rent (\$1,156), but in line with the actual rents paid with approximately three out of four renters (73.8%) in the County paying less than \$1,500 per month on rent (although these data do not distinguish between the different unit bedroom breakdowns). In order to be able to afford to pay \$1,500 in rent without being cost-burdened (spending 30 percent or more on housing costs), a Rockland County household would need to earn \$5,000 monthly/\$60,000 annually which is 29 percent less than the average median household income for the County. Additionally, while there are 10,854 households (39% of all occupied rental households) that spend more than 30 percent of their income on housing this number has decreased from 13,361 rental households in 2008.

For households earning less than the median income, affordability is an even bigger issue. Monthly Supplemental Security Income (SSI) payments for an individual are \$820 in Rockland County and across New York State. If SSI represents an individual's sole source of income, \$246 in monthly rent is affordable, while the 2015 FMR for a one-bedroom is \$1,243.

On the other hand, the 2011 median home value was \$465,100. According to 2007-2011 ACS estimates, the median income of Rockland County residents is \$84,661 which corresponds to a maximum affordable home purchase price of approximately \$314,600 (assuming a 20% down payment and 30 year fixed mortgage). The fact that the median income in Rockland County would not allow a household to afford a home at the median sales price suggests that the County is an inherently unaffordable market, though the affordability of housing among communities varies.

Table 3.23 - Rent Paid (2011)

Rent Paid	Number	%
Less than \$500	3,836	13.9%
\$500-999	6,568	23.7%
\$1,000-1,499	10,015	36.2%
\$1,500-1,999	4,479	16.2%
\$2,000 or more	2,798	10.1%
Total	27,696	100.0%

Data Source: 2007-2011 ACS

Although housing affordability varies for each community, these data show that the cost of housing for both renters and owners has outpaced the County's median household income growth of 25 percent during the same period of time. It is worth noting that this analysis does not address the availability of rental housing units at these price ranges, but only the affordability of the existing rental housing stock based on the amount of actual rent paid by tenant households.

vi. Protected Class Status and Cost Burden

Lower-income minority households tend to experience heavy housing cost burdens at a higher rate than lower-income White households, a circumstance due at least in part to the disparity in median income among racial and ethnic groups. The data provided by 2007-2011 CHAS breaking down the housing cost burden by race and ethnicity are flawed and thus cannot be used to calculate the disproportionate housing cost burden for each race/ethnicity.⁷ However, while it is not possible to draw meaningful conclusions from the data provided below, some generalizations can be inferred from section **NA-15 Disproportionately Greater Need: Housing Problems** of the Rockland County 2015-2019 Consolidated Plan. According to CHAS data in section **NA-10 Housing Needs Assessment** of the Consolidated Plan, housing cost burden is the biggest housing issue in Rockland County with 25.3 percent of all households (renter and owner, all income categories) cost burdened or extremely cost burdened, with no other housing problems. Severe housing cost burden (greater than 50% of income is spent on housing costs) accounts for 43.2 percent of the housing problems among renters and 60.5 percent of the housing problems among owners. White households in Rockland County earning between 50-80% AMI and 80-100% AMI likely face a disproportionately greater housing cost burden need than other races and ethnic groups at all income levels.

⁷ HUD defines “cost burdened” households as those paying 30% or more of gross income on monthly housing expenses. “Severely cost burdened” households pay 50% or more.

4. INTEGRATION AND SEGREGATION

The U.S. Department of Housing and Urban Development (HUD) defines segregation as the concentration of poverty and racial and ethnic populations and contends that “numerous studies indicate that segregation negatively impacts minorities’ educational attainment, labor market outcomes, physical and mental health, and crime victimization. These negative outcomes translate to lower economic productivity for the nation as a whole, and increased costs to society in a multitude of ways, from the justice system to the public health infrastructure⁸. Although segregation is due in part to a historical legacy of discrimination and will be a challenge to address, the first step in addressing segregation and the related issues, as well as moving towards integrated communities, is to begin to assess these patterns of segregation.

Segregation can statistically be represented as 1) a comparison of racially/ethnically concentrated areas against a regional standard and 2) a measurement of the amount of separation of racial and/or ethnic groups living in a neighborhood or community. Residential segregation patterns are typically represented in the form of predominantly homogeneous and White suburban communities and low-income minority inner-city neighborhoods⁹.

A. RACIALLY/ETHNICALLY CONCENTRATED AREAS OF ROCKLAND COUNTY

For purposes of this analysis, areas of racial or minority concentration are defined as neighborhoods where the percentage of minority residents exceeds the MSA-wide or County-wide average. An assessment of the County’s 65 Census Tracts was conducted to determine the areas of concentration for the Black/African American population, Hispanic population and Hassidic speaking population.

i. Concentrated Areas of the Black/African American Population

In 2013, the Black/African American population (Black) is estimated to have made up 12.4 percent of the population in Rockland County, with a considerably higher concentration in the New York MSA (19.5%). This portion of the analysis assesses each Census Tract in relation to the County and the MSA as a whole in order to determine the significantly Black concentrated areas of the County as well as in the context of the New York MSA. Twenty (20) Census Tracts within the County exceed Rockland County’s average concentration of the Black demographic (12.4%), half of which also exceed the New York MSA’s Black/African American population (19.5%). See Table 4.1 for a list of all Census Tracts that have a concentrated Black/African American population that exceeds County and/or New York MSA averages. Map 4.1 provides a visual reference of the Black concentrated areas located within Rockland County.

The majority of the Census Tracts identified as areas of concentration are located in the Towns of Ramapo and Haverstraw. The Town of Stony Point does not have any areas of

⁸ HUD Affirmatively Furthering Fair Housing Proposed Rule, FR-5173-P-01, July 19, 2013.

⁹ Ibid.

concentration, and the Towns of Clarkstown and Orangetown each contain two Census Tracts that have been identified as an area of concentration. The highest concentrations of Black persons were located in the Villages of Spring Valley, Chestnut Ridge, Hillburn, Nyack and a portion of the Village of Haverstraw. Within these areas of concentration, which exceed both County and New York MSA percentages for the Black population, the portion of Black persons ranged from 19.5 percent in the Village of Chestnut Ridge to 62.8 percent in an area of the Town of Ramapo adjacent to and north of the Village of Spring Valley, also known as Hillcrest, a Census Designated Place.

Although the percentage of Black persons in Rockland County was significantly lower than the New York MSA in 2013, the portion of Black persons in 10 Census Tracts, 107.01, 113.01, 115.04, 118.0, 122.02, 123.0, 124.01, 124.02, 125.02, 131.00 and 132.00 exceeded the New York MSA average of 24.4 percent (see Table 4.2 and Map 4.2). This indicates that these 10 Census Tracts are areas of racial concentration for Black populations within the context of both the County and the New York MSA.

Table 4.1: Areas of Racial and/or Ethnic Concentration – Black/African American

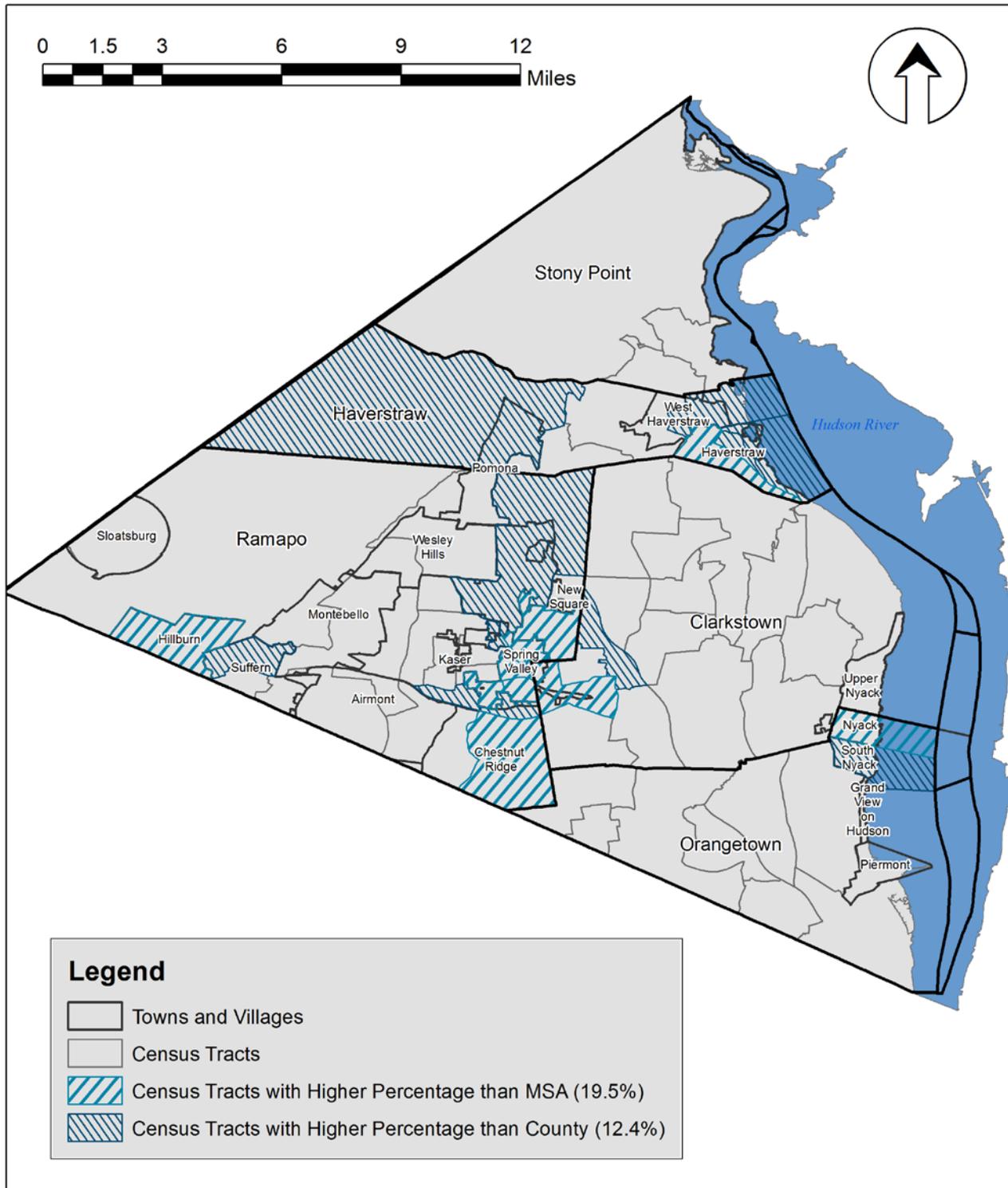
Census Tracts	Total Population	White	Select Minority Populations	
			Black	Hispanic
New York MSA	5,828,116	55.7%	19.5%	24.4%
Rockland County	315,069	72.2%	12.4%	16.1%
105.03	2,343	64.8%	21.8%	11.4%
106.02	6,431	60.6%	16.5%	48.3%
107.01	4,338	47.7%	25.5%	42.7%
107.02	4,167	53.2%	17.2%	81.5%
107.03	3,447	58.3%	17.8%	59.1%
113.01	7,367	27.6%	36.4%	33.6%
114.05	3,775	70.7%	14.9%	9.1%
115.02	8,182	57.4%	17.3%	23.1%
115.04	7,629	18.6%	62.8%	18.4%
118.00	880	47.7%	30.3%	18.2%
119.02	3,461	66.1%	13.6%	25.9%
121.06	4,123	70.7%	15.6%	20.2%
122.02	6,237	11.3%	61.5%	21.6%
122.04	3,166	81.8%	12.8%	6.2%
123.00	6,286	10.3%	38.4%	51.1%
124.01	4,809	28.9%	53.0%	14.0%
124.02	5,816	13.8%	29.0%	58.0%
125.02	4,937	66.9%	19.5%	10.6%
131.00	6,120	72.5%	21.7%	10.1%
132.00	3,538	72.9%	13.2%	5.8%

Source: 2009-2013 American Community Survey (S0601).

Note: Bold represents areas of concentration for both Black/African American and Hispanic populations.

Note: Highlighted rows identify Census Tracts that exceed the average percentage of Black/African American people in the New York MSA (19.5%), which is significantly higher than the County's average.

Map 4.1: Areas of Concentration within Rockland County (Black/African American)



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

ii. Concentrated Areas of the Latino/Hispanic Population

In 2013, the Hispanic/Latino population (Latino) is estimated to have made up 16.1 percent of the population in Rockland County, with a considerably higher concentration in the New York MSA (24.4%). This portion of the analysis assesses each Census Tract in relation to the County and the MSA as a whole in order to determine the significantly Hispanic concentrated areas of the County as well as in the context of the New York MSA. Twenty-one (21) Census Tracts within the County exceed Rockland County's average concentration of the Hispanic demographic (16.1%), approximately half of which also exceed the New York MSA's Hispanic population (24.4%). See Table 4.2 for a list of all Census Tracts that have a concentrated Hispanic population that exceeds County and/or New York MSA averages. Map 4.2 provides a visual reference of the Hispanic concentrated areas located within Rockland County.

The majority of the Census Tracts identified as areas of concentration are located in the Towns of Ramapo and Haverstraw, although three are located in the Town of Clarkstown, two are located in the Town of Stony Point and one is located in the Town of Orangetown. The highest concentrations of Hispanic persons were located in the Villages of Haverstraw, West Haverstraw Pomona (portion located in the Town of Haverstraw) and portions of the Villages of Spring Valley and Suffern. Within these areas of concentration, which exceed both County and New York MSA percentages for the Hispanic population, the portion of Hispanics ranged from 25.9 percent in the Village of Suffern to 81.5 percent in a portion of the Village of Haverstraw.

Although the percentage of Hispanic persons in Rockland County was significantly lower than the New York MSA In 2013, the portion of Hispanic persons in 10 Census Tracts, 105.02, 106.01, 106.02, 107.01, 107.02, 107.03, 113.01, 119.02, 123 and 124.02, exceeded the New York MSA average of 24.4 percent (see Table 4.2 and Map 4.2). This indicates that these 10 Census Tracts are areas of racial concentration for Hispanic populations within the context of the New York MSA.

Table 4.2: Areas of Racial and/or Ethnic Concentration – Hispanic

Census Tracts	Total Population	White	Select Minority Populations	
			Black	Hispanic
New York MSA	5,828,116	55.7%	19.5%	24.4%
Rockland County	315,069	72.2%	12.4%	16.1%
101.02	5,146	79.4%	6.2%	22.3%
102.00	4,480	80.2%	9.0%	16.3%
105.01	5,269	86.0%	7.9%	17.9%
105.02	6,863	70.3%	10.7%	41.1%
106.01	3,976	84.0%	9.6%	39.3%
106.02	6,431	60.6%	16.5%	48.3%
107.01	4,338	47.7%	25.5%	42.7%
107.02	4,167	53.2%	17.2%	81.5%
107.03	3,447	58.3%	17.8%	59.1%
108.04	4,242	78.2%	5.3%	16.5%

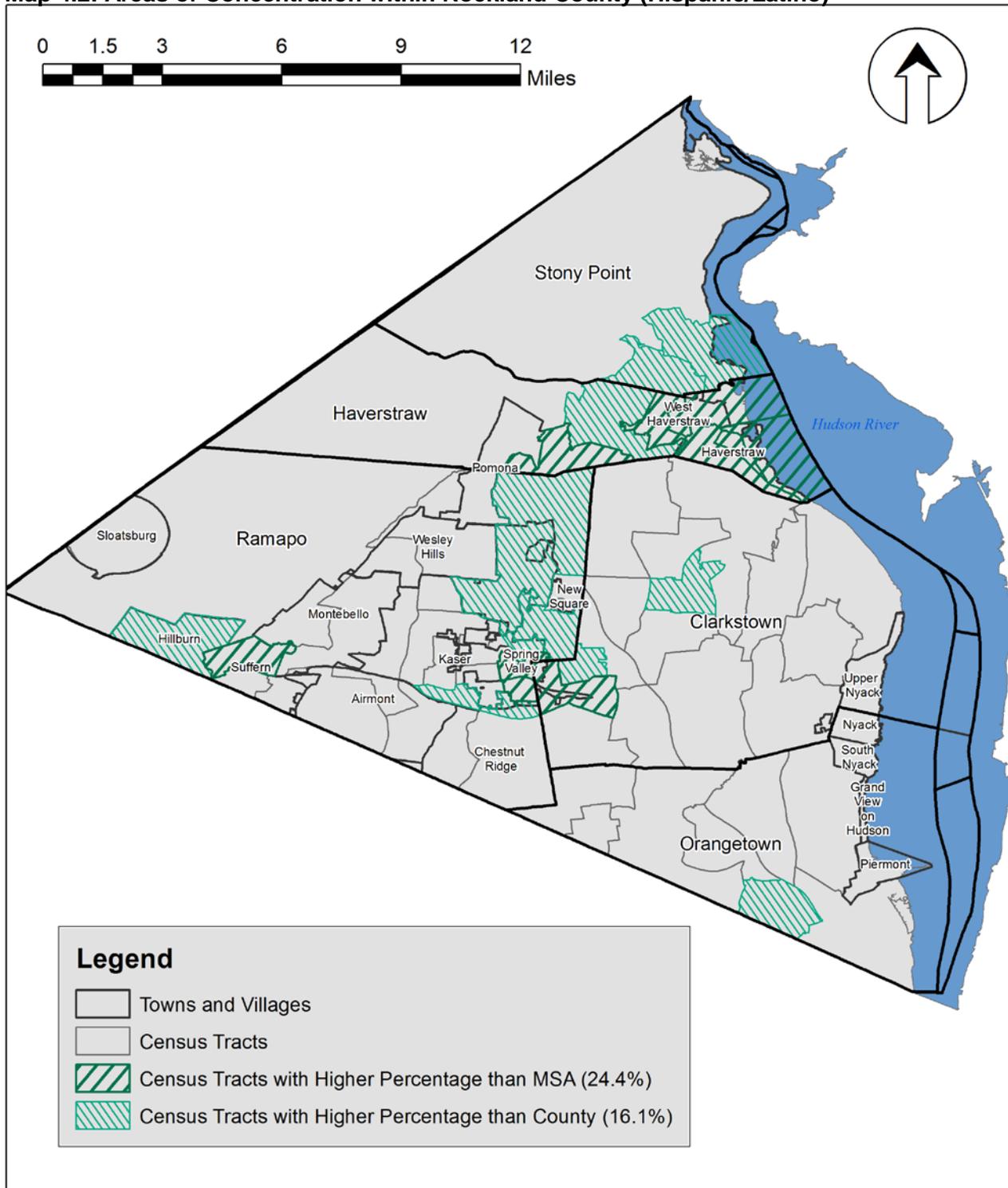
113.01	7,367	27.6%	36.4%	33.6%
114.04	4,175	69.1%	9.9%	19.0%
115.02	8,182	57.4%	17.3%	23.1%
115.04	7,629	18.6%	62.8%	18.4%
118.00	880	47.7%	30.3%	18.2%
119.02	3,461	66.1%	13.6%	25.9%
121.06	4,123	70.7%	15.6%	20.2%
122.02	6,237	11.3%	61.5%	21.6%
123.00	6,286	10.3%	38.4%	51.1%
124.02	5,816	13.8%	29.0%	58.0%
134.01	4,291	81.2%	4.8%	17.0%

Source: 2009-2013 American Community Survey (S0601).

Note: Bold represents areas of concentration for both Black/African American and Hispanic populations.

Note: Highlighted rows identify Census Tracts that exceed the average percentage of Black/African American people in the New York MSA (24.4%), which is significantly higher than the County's average.

Map 4.2: Areas of Concentration within Rockland County (Hispanic/Latino)



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

iii. Concentrated Areas of the Yiddish Speaking Population

Due to Federal law, the United States Census is unable to collect data on religion. However, anecdotal information suggests there are concentrations of population based on various religious cultures in the County, most notably the Hasidic Jewish populations of Kaser, New Square and Monsey. Although no data are available on populations by religion, anecdotal information regarding the historical development patterns of the County coupled with cultural barriers suggested that this has led to a form of segregation by religion. In 2013, the Yiddish speaking population was estimated to number 23,242, which accounts for eight (8) percent of the County's population ages 5 and above.¹⁰ The portion of the Yiddish speaking population has grown, as in 2000 the Yiddish speaking population represented five (5) percent of the population.¹¹ In contrast, the Yiddish speaking population accounted for only one (1) percent of languages spoken by persons ages 5 and above in the New York MSA in 2013. See Table 4.3 for a list of all Census Tracts that have a concentrated Yiddish speaking population that exceeds County and/or New York MSA averages. Map 4.3 provides a visual reference of the Yiddish speaking concentrated areas located within Rockland County.

Table 4.3: Areas of Concentration – Yiddish Speaking Population

Census Tracts	Yiddish-Speaking Population
New York MSA	1.0%
Rockland County	8.0%
108.02	1.1%
115.01	1.2%
115.05	81.8%
115.06	77.9%
116.01	6.0%
116.02	8.3%
119.02	2.3%
121.01	55.0%
121.02	88.6%
121.03	46.3%
121.05	46.3%
121.06	26.4%
122.02	5.6%
122.03	33.2%
122.04	40.2%
125.01	13.3%
125.02	2.1%
130.03	1.3%

Source: 2009-2013 American Community Survey (B16001).

Note: Highlighted rows point out Census Tracts that exceed the County's estimated Yiddish speaking population, which is significantly higher than in the New York MSA.

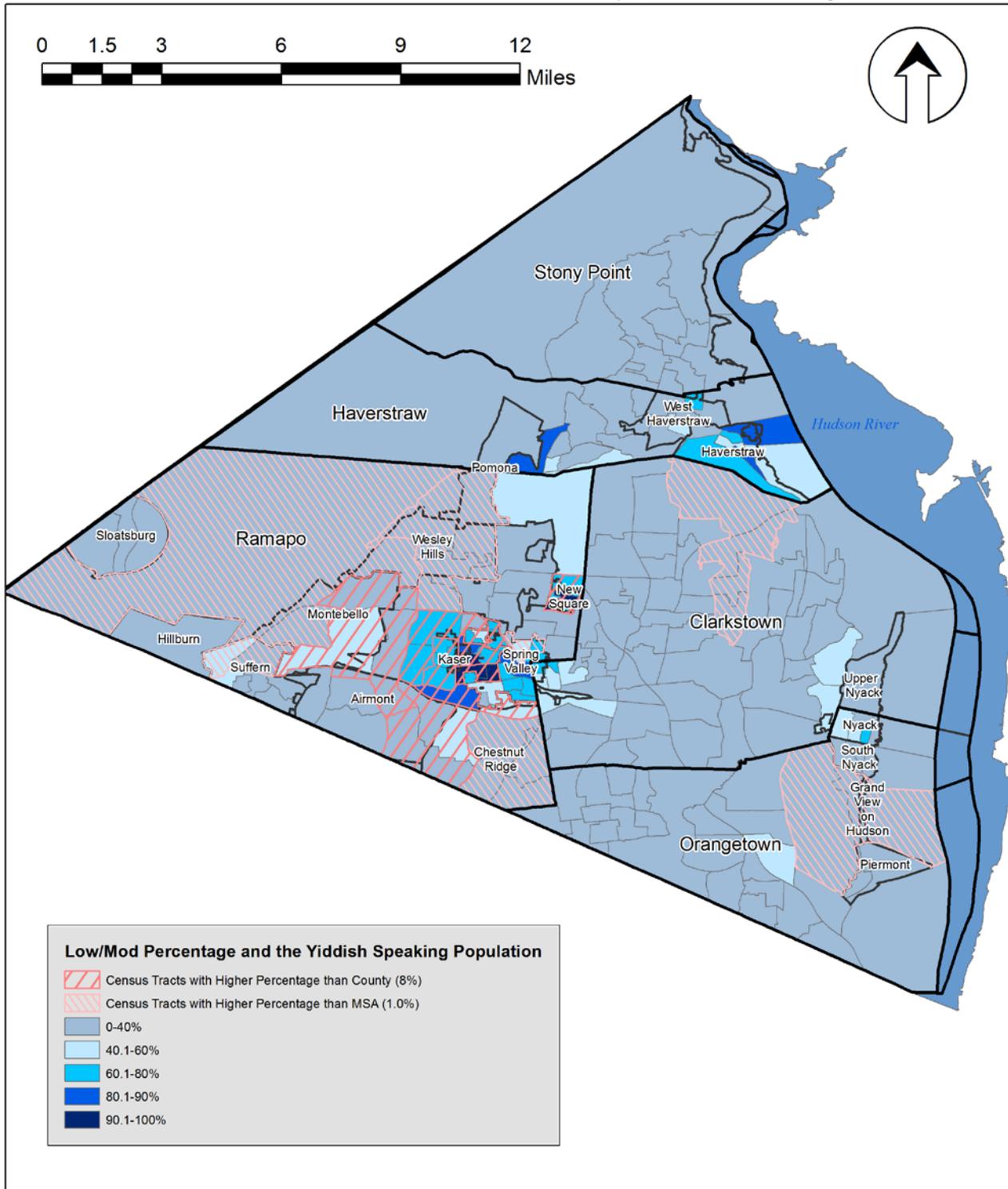
¹⁰ 2009-2013 American Community Survey, U.S. Census Bureau.

¹¹ 2000 Census, U.S. Census Bureau.

The majority of the Census Tracts identified as areas of concentration for the Yiddish speaking population are located in the Town of Ramapo. The highest concentrations of Yiddish speaking persons are located in the Villages of New Square and Kaser, the Monsey CDP and in portions of the Villages of Spring Valley, Chestnut Ridge, Airmont and Montebello as well as Viola CDP. Within these areas of concentration, which exceed both County and New York MSA percentages for the Yiddish speaking population, the portion of this population ranged from 8.3 percent in the Village of Montebello and Viola CDP to 88.6 percent in a Census Tract that includes the northwest portion of the Village of Spring Valley as well as the majority of the Village of Kaser.

The percentage of Yiddish speaking persons in Rockland County was significantly higher than the New York MSA in 2013. Eleven (11) Census Tracts, 115.05, 115.06, 116.02, 121.01, 121.02, 121.03, 121.05, 121.06, 122.03, 122.04, 125.01, exceeded the County's average of 8.0 percent (see Table 4.3 and Map 4.3).

Map 4.3: Areas of Concentration within Rockland County (Yiddish Speaking)



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

B. PATTERNS OF RESIDENTIAL SEGREGATION

Residential segregation is generally calculated using statistical equations that measure five dimensions identified in a statistical analysis of approximately 19 segregation indices, which was undertaken by Douglas Massey and Nancy Denton in 1988¹². These dimensions are: evenness, exposure, clustering, concentration and centralization. This section will assess the evenness or distribution of the population and the exposure or isolation of the Black and Hispanic racial/ethnic groups versus the White demographic group in Rockland County.

i. Population Distribution

The index of dissimilarity is the most commonly used method of measuring segregation between two groups. The index of dissimilarity measures the distribution of two mutually exclusive groups across the geographic units that make up the larger geographic entity¹³. The index of dissimilarity only reveals the relative degree of segregation but does not show spatial patterns of segregation. In order to determine the level of segregation for the Black, Hispanic and Yiddish speaking populations within Rockland County, the indices of dissimilarity were calculated for each of the 65 Census Tracts. The formula used to calculate the Black-White Index of Dissimilarity is as follows:

$$D = 0.5 \sum | B_i/B - W_i/W |$$

B_i represents the Black population within each jurisdiction, B represents the Black population of Rockland County as a whole, W_i represents the White population within each jurisdiction and W represents the total population of White people in the County. The Hispanic-Black index of dissimilarity was calculated by replacing B_i/B with H_i/H . The Yiddish-English index of dissimilarity was calculated by replacing B_i/B with Y_i/Y and W_i/W with E_i/E . For each analysis, the sum of the indices for each Census Tract was then calculated, revealing the index of dissimilarity, which demonstrates the percentage of the population that would need to move in order to ensure an even distribution of each demographic group in comparison with the White population.

With an index of dissimilarity calculation, zero (0) represents complete integration and 100 represents complete segregation. An index of dissimilarity between 0 and 30 percent is generally considered low, 30 – 60 percent is moderate and an index above 60 percent is highly segregated¹⁴.

¹² Weinberg, Iceland and Steinmetz, "Measurement of Segregation by the U.S. Bureau of the Census" in *Racial and Ethnic Segregation in the United States: 1980-2000*.

¹³ Social Science Data Analysis Network, CensusScope, *About Dissimilarity Indices*, www.censusscope.org/print_about_dissimilarity.html.

¹⁴ Massey, Douglas S. "Origins of Economic Disparities: The Historical Role of Housing Segregation." In *Segregation: The Rising Costs for America*, edited by James H. Carr and Nanindee K. Kutty (New York: Routledge 2008).

a. Population Distribution by Race/Ethnicity

The White-Black index of dissimilarity for Rockland County is 55 percent, indicating that 55 percent of either the White or Black demographic would have to move to a different Census Tract to create even population distribution between the two groups – see Table 4.4. As an index score between 30 and 60 is considered moderate, this analysis indicates that the County’s Black/African American population is moderately segregated.¹⁵ This is a decrease from the County’s dissimilarity index of 61 percent in 2000 and 2009, indicating that the segregation of the Black/African American population has decreased since 2000.¹⁶

The White-Hispanic index of dissimilarity for Rockland County is 46.5 percent, indicating that 46.5 percent of either the White or Hispanic demographic would have to move to a different Census Tract to create even population distribution between the two groups – see Table 4.4. As an index score between 30 and 60 is considered moderate, this analysis indicates that the County’s Hispanic population is moderately segregated.¹⁷ This is an increase from the County’s dissimilarity index of 43 percent in 2000 and 45 percent 2009, indicating that the segregation of the Hispanic American population has increased incrementally since 2000.¹⁸

Table 4.4: Indices of Dissimilarity by Race/Ethnicity

Demographic Group	DI with White Population	Population	% of Total Population
White	--	227,418	72.2
Black	55.0%	38,953	12.4%
Hispanic	46.5%	50,598	16.1%

Source: 2009-2013 American Community Survey (DP-05), U.S. Census Bureau.

b. Population Distribution of Yiddish Speaking Population

Traditionally, Yiddish is the language of Jewish communities from Central and Eastern Europe and is often the language used by Hasidic and other Orthodox Jewish communities. As the United States Census Bureau is unable to collect data on religion, measuring the index of dissimilarity between the English speaking and Yiddish speaking populations will provide a general idea of the population distribution of Orthodox Jewish communities in the County.

¹⁵ Massey, Douglas S. “Origins of Economic Disparities: The Historical Role of Housing Segregation.” In *Segregation: The Rising Costs for America*, edited by James H. Carr and Nanindee K. Kutty (New York: Routledge 2008).

¹⁶ *Rockland County Analysis of Impediments to Fair Housing Choice, 2009*

¹⁷ Massey, Douglas S. “Origins of Economic Disparities: The Historical Role of Housing Segregation.” In *Segregation: The Rising Costs for America*, edited by James H. Carr and Nanindee K. Kutty (New York: Routledge 2008).

¹⁸ *Rockland County Analysis of Impediments to Fair Housing Choice, 2009*

The English-Yiddish index of dissimilarity for Rockland County is 86.1 percent, indicating that 86.1 percent of either the English Speaking or Yiddish speaking demographic would have to move to a different Census Tract to create even population distribution between the two groups – see Table 4.5. As an index score above 60 is considered high, this analysis indicates that the County’s Yiddish-speaking population is highly segregated.¹⁹ This is a slight increase from the County’s dissimilarity index of 85 percent in 2009.²⁰

Table 4.5: Indices of Dissimilarity by Language

Language Spoken	DI with English Speaking Population	Population	% of Total Population
English Only	--	182,514	62.7%
Yiddish	86.1%	23,242	8.0%

Source: 2009-2013 American Community Survey (B16001), U.S. Census Bureau.

c. Synopsis – Population Distribution

The Black/African American and Hispanic demographic groups were identified in the County’s 2009 *Analysis of Impediments to Fair Housing Choice* as populations experiencing moderate or high segregation. The Black/African American-White dissimilarity index was estimated to have dropped from a highly segregated index (61%) in 2009 to a moderately segregated index (55%) in 2013. However, the Black/African American population is still a moderately segregated population and is more highly segregated than the Hispanic population. On the other hand, the Hispanic-White dissimilarity index was estimated to have increased from 43 percent in 2000 and 45 percent in 2009 to 46.5 in 2013, indicating a trend of incrementally increasing segregation rates for this population.

Although no data are available on populations by religion, anecdotal information regarding the historical development patterns of the County, coupled with cultural barriers, suggests that this has led to a form of segregation by religion.²¹ As explained above, the dissimilarity index of the Yiddish and English speaking populations is intended to evaluate the segregation rates of the Orthodox Jewish population in Rockland County, including the Hasidic group. The estimated dissimilarity index of the Yiddish and English speaking populations in 2013 is 86.1 percent, demonstrating that the County’s Orthodox Jewish communities are highly segregated. As this is an increase from a dissimilarity index of 85 percent in 2009, the segregation of the County’s Orthodox Jewish communities is potentially increasing.

¹⁹ Massey, Douglas S. “Origins of Economic Disparities: The Historical Role of Housing Segregation.” In *Segregation: The Rising Costs for America*, edited by James H. Carr and Nanindee K. Kutty (New York: Routledge 2008).

²⁰ *Rockland County Analysis of Impediments to Fair Housing Choice*, 2009

²¹ *Ibid.*

ii. Exposure of Minority and Linguistic Groups

Another dimension of segregation is exposure or isolation, which refers to the degree of potential contact between groups within the County's jurisdictions and hamlets, as measured in Census Tracts. These indices measure the extent to which groups must physically confront each other in terms of sharing a common residential area. Thus, the degree of minority exposure to the majority is defined as "the likelihood of sharing a neighborhood in common²²." This section will measure the amount of exposure specific demographic and linguistic groups experience within Rockland County by calculating the isolation indices for each.

a. Population Isolation

The isolation index measures the probability that members of a specific demographic group share an area with each other, also referred to as the exposure of people within a minority group to one another²³. The isolation index calculates the concentration or isolation of one group and is calculated for one demographic group at a time. The isolation index does not compare the distribution of two groups. The formula used to calculate the isolation of the Black demographic group is as follows:

$$E = \sum (B_i/B) * (B_i/T_i)$$

As in the index of dissimilarity calculation above, B_i represents the Black population within each jurisdiction and B represents the Black population of Rockland County as a whole. T_i represents the total population within the jurisdiction. The Hispanic exposure indices were calculated by replacing B_i/B with H_i/H , and the White exposure indices were calculated by replacing B_i/B with W_i/W . The Yiddish exposure indices were calculated by replacing B_i/B with Y_i/Y within the context of the County's population ages 5 and above (T_i).

Overall, the Isolation index measures the level of exposure an average member of a specific demographic has with its own demographic. The maximum value of the isolation indices calculated above is 100, which represents total isolation as represented as complete exposure or interaction only with members of the same demographic group. The isolation indices calculated for the Black, White and Hispanic demographic groups indicate that members of the Black/African American and Hispanic populations experience the least interaction with members of the same demographic group – see Table 4.6. The Black/African American and Hispanic populations experience low to moderate levels of population isolation. In contrast, the White demographic group, with a population isolation index of 79.5 percent, is the most isolated racial/ethnic demographic group in the County.

²² Weinberg, Iceland and Steinmetz, "Measurement of Segregation by the U.S. Bureau of the Census" in *Racial and Ethnic Segregation in the United States: 1980-2000*.

²³ Denton, Nancy and Massey, Doug, "The Dimensions of Residential Segregation," *Social Forces*, v.67 (2)(December 1988): pp 281-315.

Table 4.6: Isolation Indices

	Isolation Indices	Population	% of Total Population
White	79.5%	227,418	72.2
Black	30.5%	38,953	12.4%
Hispanic	32.1%	50,598	16.1%
English Speaking	70.7%	182,514	62.7%
Yiddish Speaking	60.7%	23,242	8.0%

Source: 2009-2013 American Community Survey (DP-05), U.S. Census Bureau.

The isolation indices calculated for the English and Yiddish speaking populations indicate that members of both groups experience little interaction with members of different linguistic groups – see Table 4.6 above.

iii. **Synopsis**

This section assessed two common measures of segregation: the evenness or distribution of the population and the exposure or isolation of the White, Black and Hispanic racial/ethnic groups as well as the English and Yiddish speaking populations. Overall, trends indicate that Blacks and Hispanics are moderately segregated in terms of population distribution but are much more likely to interact with populations of other demographic groups than the White demographic group, which demonstrates a high level of isolation within Rockland County. The Yiddish speaking linguistic group demonstrates significant segregation patterns in both distribution of population in the County and isolation. Finally, the English speaking linguistic group demonstrates a high level of isolation within Rockland County.

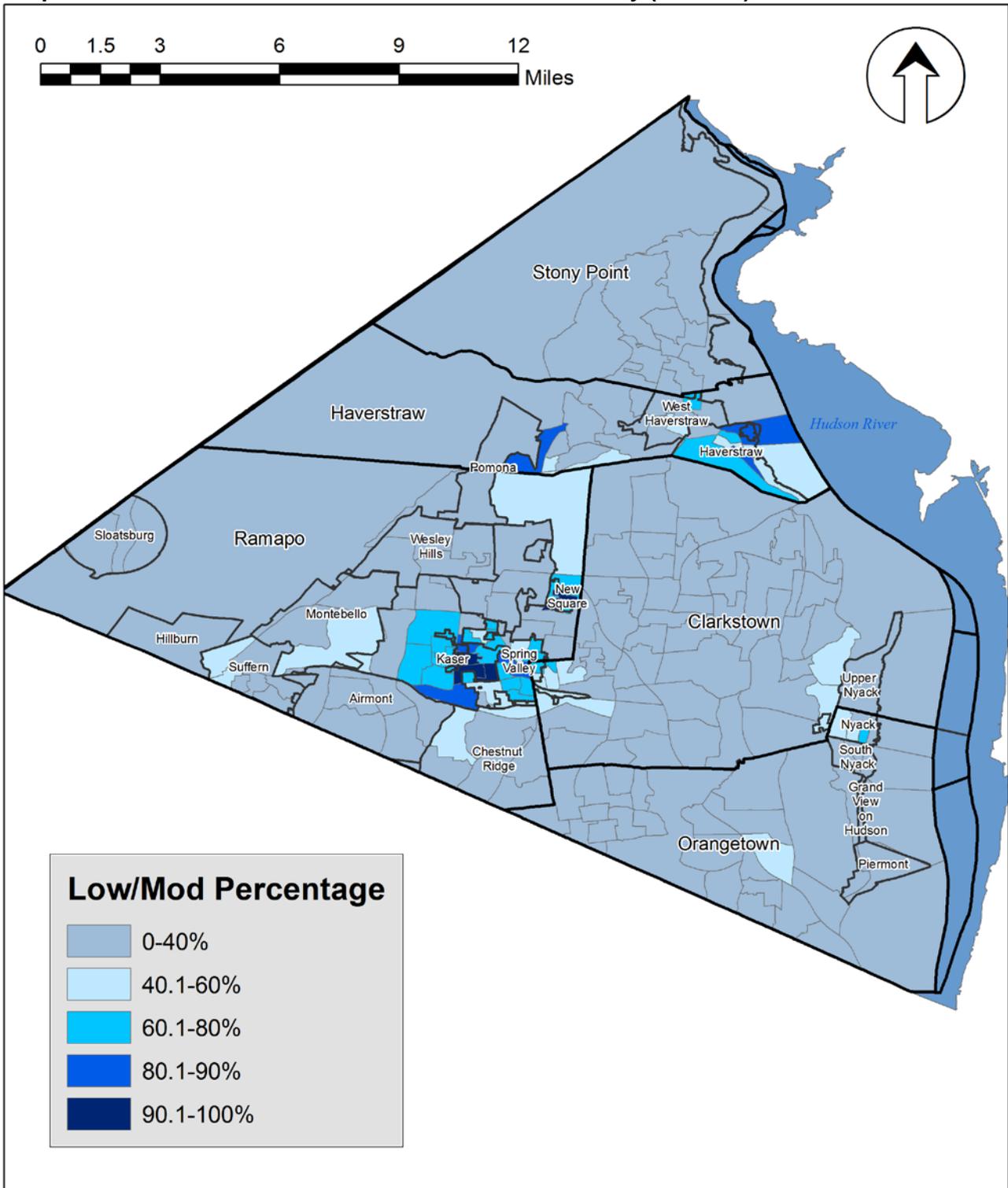
C. RACIALLY/ETHNICALLY CONCENTRATED AREAS OF POVERTY

i. **Concentrations of Low and Moderate Income Persons**

HUD imposes a statutory requirement on the CDBG program which requires that at least 70 percent of funds invested benefit low and moderate income persons. This section identifies the highest concentrations of low and moderate income households in Rockland County, which then represents the County's concentrated areas of poverty.

For the purpose of this analysis, concentrated areas of poverty are assessed using data provided by HUD which outlines the concentration of low and moderate income populations in the County by Census Tract block group. For purposes of this analysis, a concentrated area of poverty is defined as an area with a population that contains at least 40 percent low and moderate income persons. An analysis of HUD 2014 Low and Moderate income estimates reveals that 3.5 percent (57) of the 203 block groups located within Rockland County are concentrated areas of poverty, as defined above. These 57 block groups are located within 29 of the County's 65 Census Tracts. Map 4.4 demonstrates the areas within the County with concentrations of low and moderate income persons.

Map 4.4: Low/Moderate Income Areas of Rockland County (FY 2014)



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

ii. Racially/Ethnically Concentrated Areas of Poverty

Of the 26 Census Tracts within the County identified as a racially, ethnically or Yiddish speaking concentrated area in Section A, 16 of have been identified as a concentrated area of poverty for the Black/African American and/or Hispanic populations – see Maps 4.5 and 4.6, below. The highest concentrations of the low and moderate income Black/African American and Hispanic demographic groups are located in the Towns of Haverstraw and Ramapo, specifically in portions of the Village of Haverstraw and West Haverstraw, New Square, Kaser and Spring Valley, as well as in the hamlets of Monsey and Viola. There are also concentrations of low and moderate income Hispanic people in the hamlet of Mountley in the Town of Haverstraw and the Village of Nyack in the Town of Orangetown.

iii. Yiddish Speaking Concentrated Areas of Poverty

Of the 26 Census Tracts within the County identified as a racially, ethnically or Yiddish speaking concentrated area in Section A, 13 have been identified as a concentrated area of poverty for the County's Yiddish speaking population – see Map 4.7, below. The concentrations of low and moderate income Yiddish persons are generally correlated with the number of Yiddish speaking persons, as the Census Tracts with the highest concentrations of Yiddish speaking persons (above 8%) are also Tracts with at least one block group that has a low and moderate income concentration of 40 percent or above.

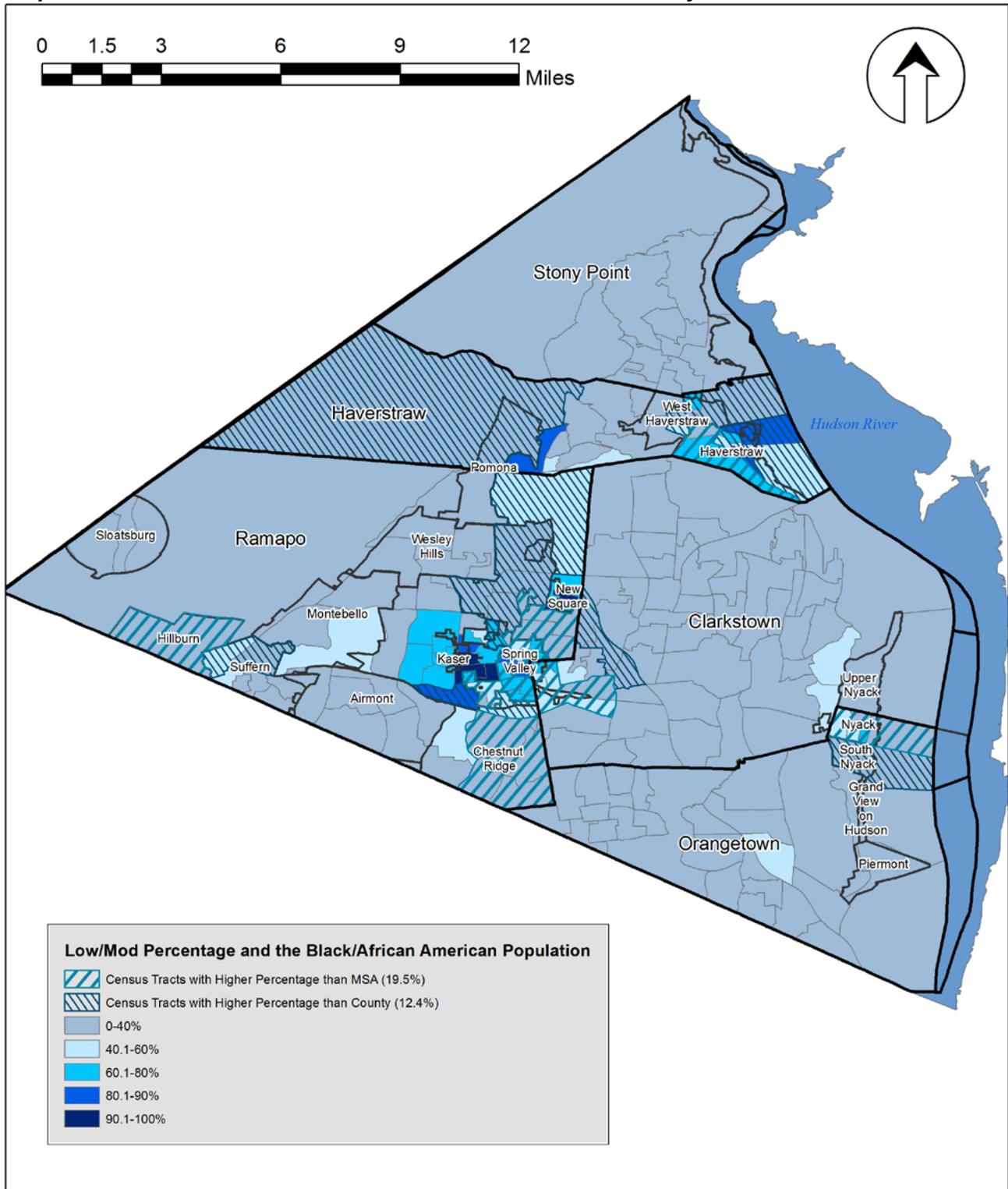
iv. Synopsis

The integration and segregation analysis was conducted using two primary analyses: 1) a spatial and statistical assessment of the segregation of the Yiddish speaking population, Black and Hispanic demographic/linguistic groups and 2) a spatial analysis of the concentration of the low and moderate income population compared with racial/ethnic segregation.

All but four (4) of the 57 block groups classified above as concentrated areas of poverty are located within Census Tracts that have been identified as a Yiddish speaking, racially or ethnically concentrated area (see Section A, above). Overall, 26 of the 29 Census Tracts within the County identified as Yiddish speaking, racial and/or ethnic areas of concentration included areas where at least 40 percent of residents met the definition for low and moderate income status. Areas within Rockland County where low and moderate income block groups and Yiddish speaking and minority concentrations coincide are identified in Maps 4.5, 4.6 and 4.7, below.

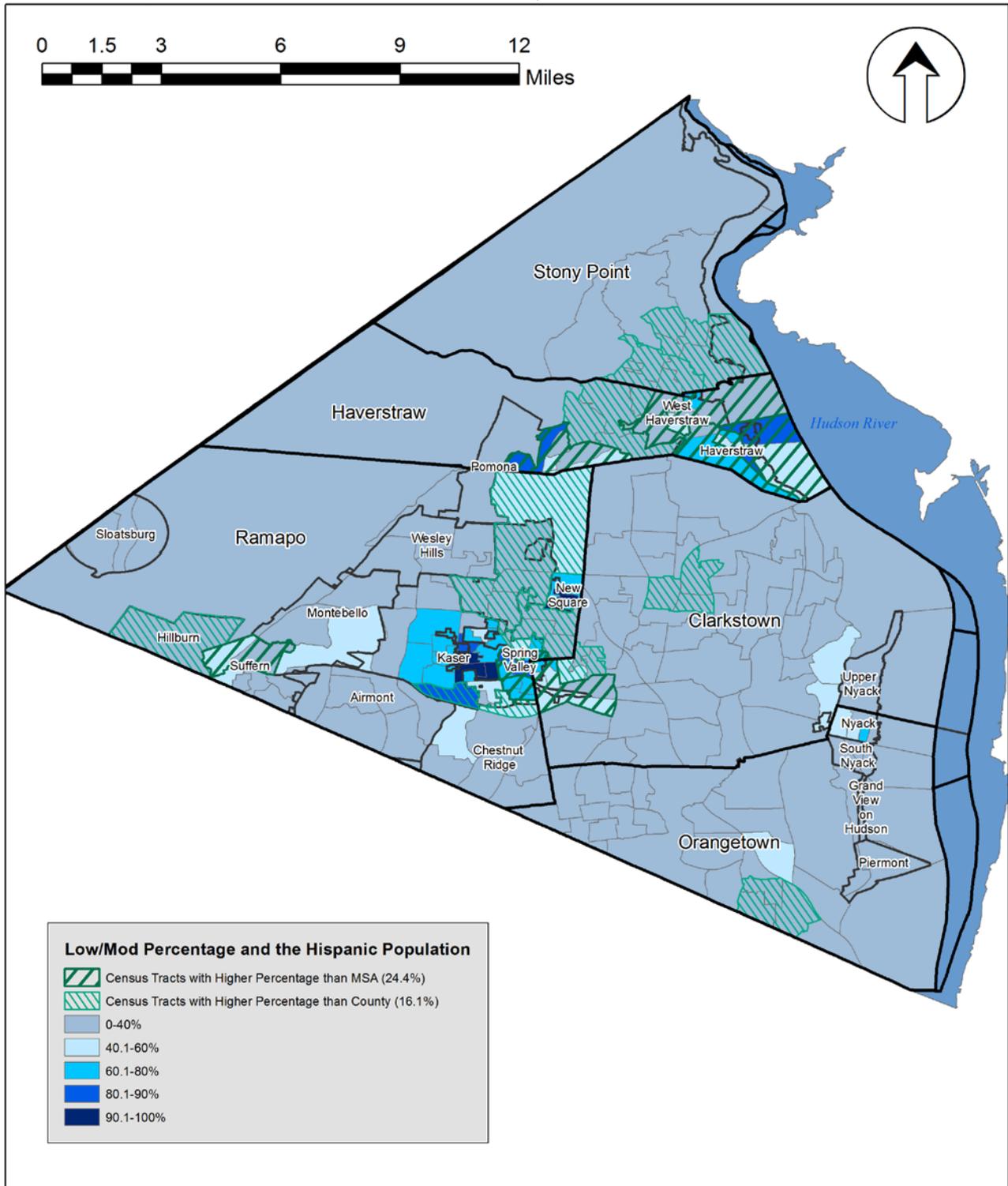
While the low and moderate income population is concentrated in only 3.5 percent of the County's block groups, the majority of these block groups are located in areas of concentration for the Yiddish speaking, Black and Hispanic demographic/linguistic groups demonstrates significant residential segregation patterns.

Map 4.5: Black/African American Concentrated Areas of Poverty



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

Map 4.6: Hispanic Concentrated Areas of Poverty



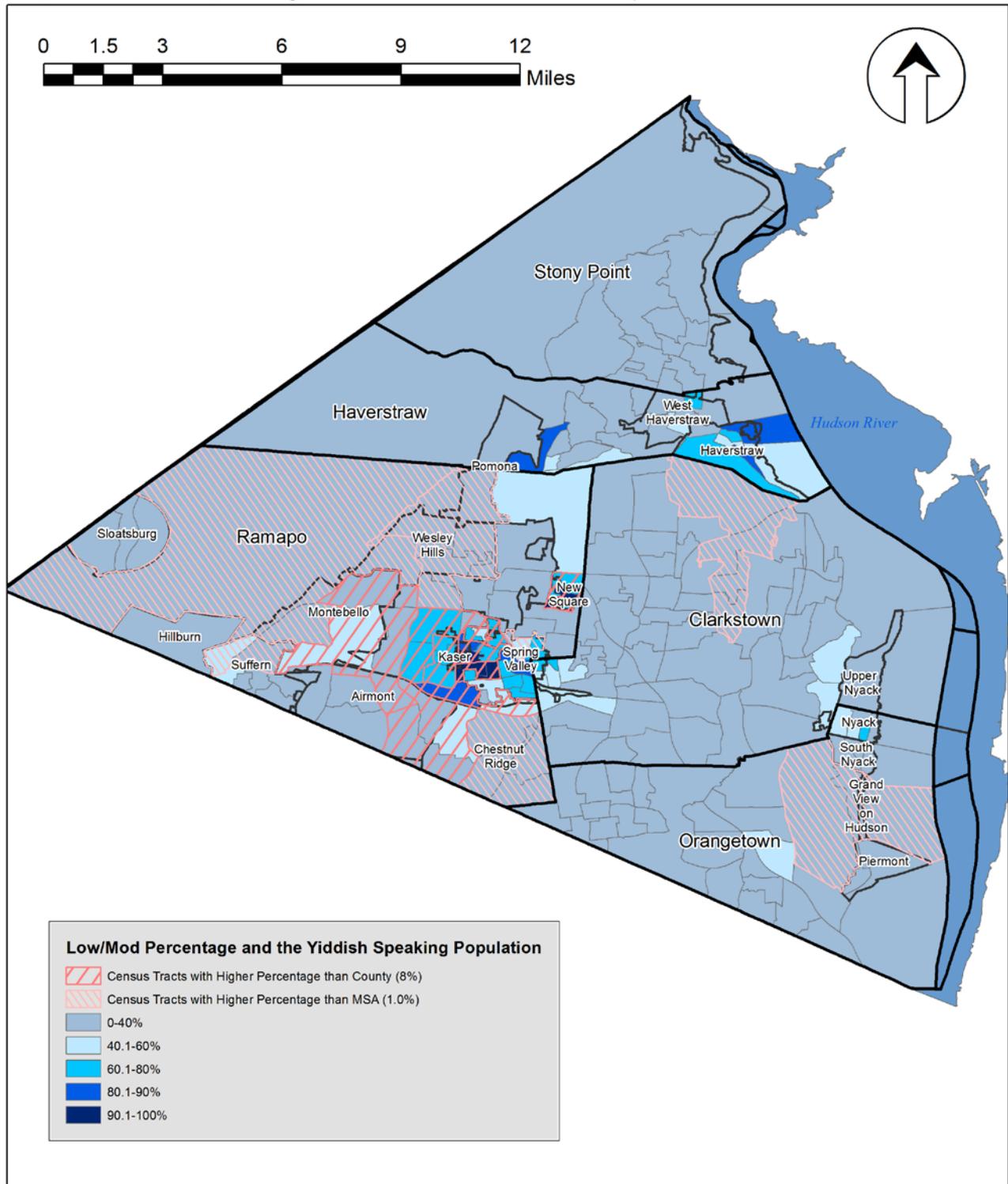
Rockland County, New York

Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development

Prepared by: Ferrandino & Associates Inc.

Date: May 2015

Map 4.7: Yiddish Speaking Concentrated Areas of Poverty



Rockland County, New York
Data Source: Rockland County, U.S. Census Bureau (2013), U.S. Department of Housing and Urban Development
Prepared by: Ferrandino & Associates Inc.
Date: May 2015

D. NEIGHBORHOOD DISPARITIES IN ACCESS TO COMMUNITY ASSETS

Having access to good schools, safe streets, quality jobs, effective public transportation, recreation and other social services helps facilitate a good quality of life and improved life outcomes.

i. Public Transportation

Rockland County residents have a number of public transportation options, with the Metro North Railroad, NJTransit, Haverstraw-Ossining ferry and the Transport of Rockland (TOR) bus system. The Haverstraw-Ossining ferry is operated by the NY Waterway and provides transit across the Hudson River to Ossining, NY and, for a \$4 fare for adults, \$2 fare for seniors, connects passengers with the Ossining Metro-North Railroad station on the Hudson line and Routes 13, 13B and 19 of the Bee Line Bus System. The ferry departs from Haverstraw, which is close to concentrations of low and moderate income persons in Haverstraw and West Haverstraw.

Only the southern portions of Rockland County are served by rail, where the Pascack Valley Line of NJTransit and the Port Jervis Line of Metro North (an extension of the NJTransit Main/Bergen Line) run through Rockland County. The Pascack Valley Line has three stops in Rockland County: Spring Valley, Nanuet and Pearl River. As Spring Valley is the last stop on this line, this NJTransit rail line provides low income residents in Spring Valley with access to points south, including New York City. The County has one stop on the Metro North Port Jervis Line (Sloatsburg), which provides County residents with access to areas between Sloatsburg and up to Port Jervis as well as points south, particularly New York City. See Map 4.8, below, for a graphic outlining the rail lines, park and ride lots and ferry in Rockland County.

The Transport of Rockland (TOR) bus system operates 10 bus routes in the County: Routes 59, 91, 92, 93, 94, 95, 97 and Loops 1, 2 and 3, connecting residents to critical transportation links and employment centers both within and outside of the County, including the Clarkstown Mini-Trans System, Spring Valley Jitney and other regional transit services such as Rockland Coaches (Red & Tan), Short Line and NJTransit. The TOR fare is \$2.00 for a regular cash fare with a standard transfer price of \$1.00, and \$1.00 for senior citizens and the disabled, with a transfer price of \$0.50. All of the low and moderate income areas are located within a mile of at least one bus stop.

The Tappan ZEEExpress (TZx) is Rockland County's commuter bus system, which provides service between Suffern, Airmont, Spring Valley, Nanuet, Palisades Center, Central Nyack, and South Nyack in Rockland to Tarrytown and White Plains in Westchester County. The price of TZx fare is \$3.00 for a regular cash fare, with a standard transfer price of \$1.00 and \$1.50 for senior citizens and the disabled, with a transfer price of \$0.50. The Tappan ZEEExpress line runs east-west across the central/southern portions of Rockland County and within a mile of the Villages of Spring Valley and Kaser and the hamlets of Viola and Monsey, which have been identified as areas with concentrations of low and moderate income residents.

Overall, residents within the racially or ethnically concentrated areas of poverty identified in Maps 4.5, 4.6 and 4.7 above are well served by public transportation. However, the suburban character of the County may make it difficult for low and moderate income residents who cannot afford a car to walk to bus stops, and the County's distance to job centers, such as New York City, may create significant commutes.

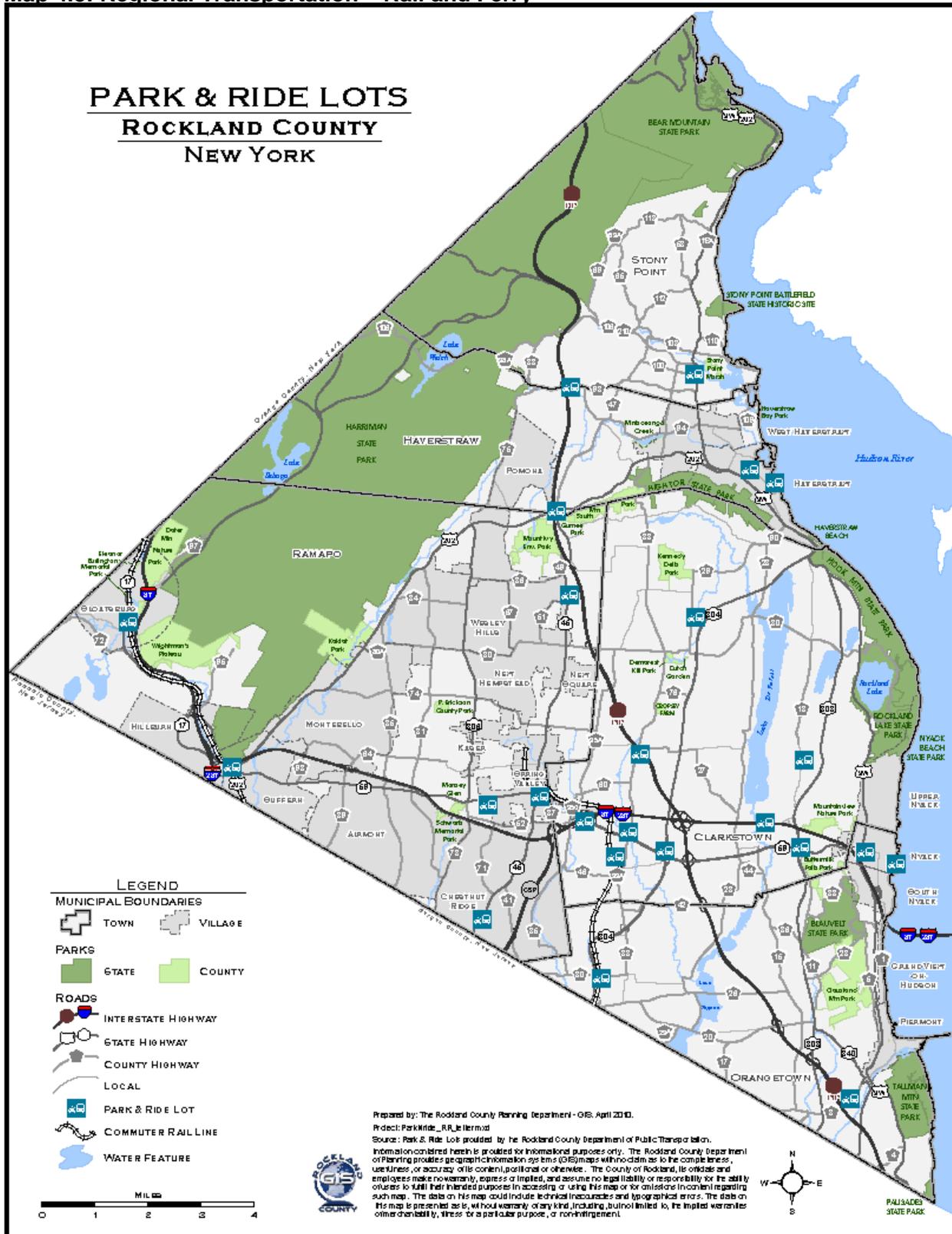
ii. Parks

With approximately one-third of its total land area devoted to preserved open space, Rockland County is known for its stewardship of natural and environmental resources at the State, County and local level.²⁴ Parkland is the single largest land use in Rockland County, with much of the preserved open space consisting of New York State parks in the northwestern portion of Rockland and a series of interconnected green spaces along the Hudson River. An additional 8 percent of the County's land area is comprised of other open spaces, including local parks, private recreation areas and water areas (see Map 4.10, below).

The majority of the concentrated areas of low and moderate income persons in Rockland County are located in the middle of Rockland County in the Town of Ramapo, away from the extensive parks located on the western edges of the County, areas north of these areas and on the eastern edge of the County. This can be attributed in part to the fact that the concentrated areas of low and moderate income areas are primarily located in Villages, which are more built out.

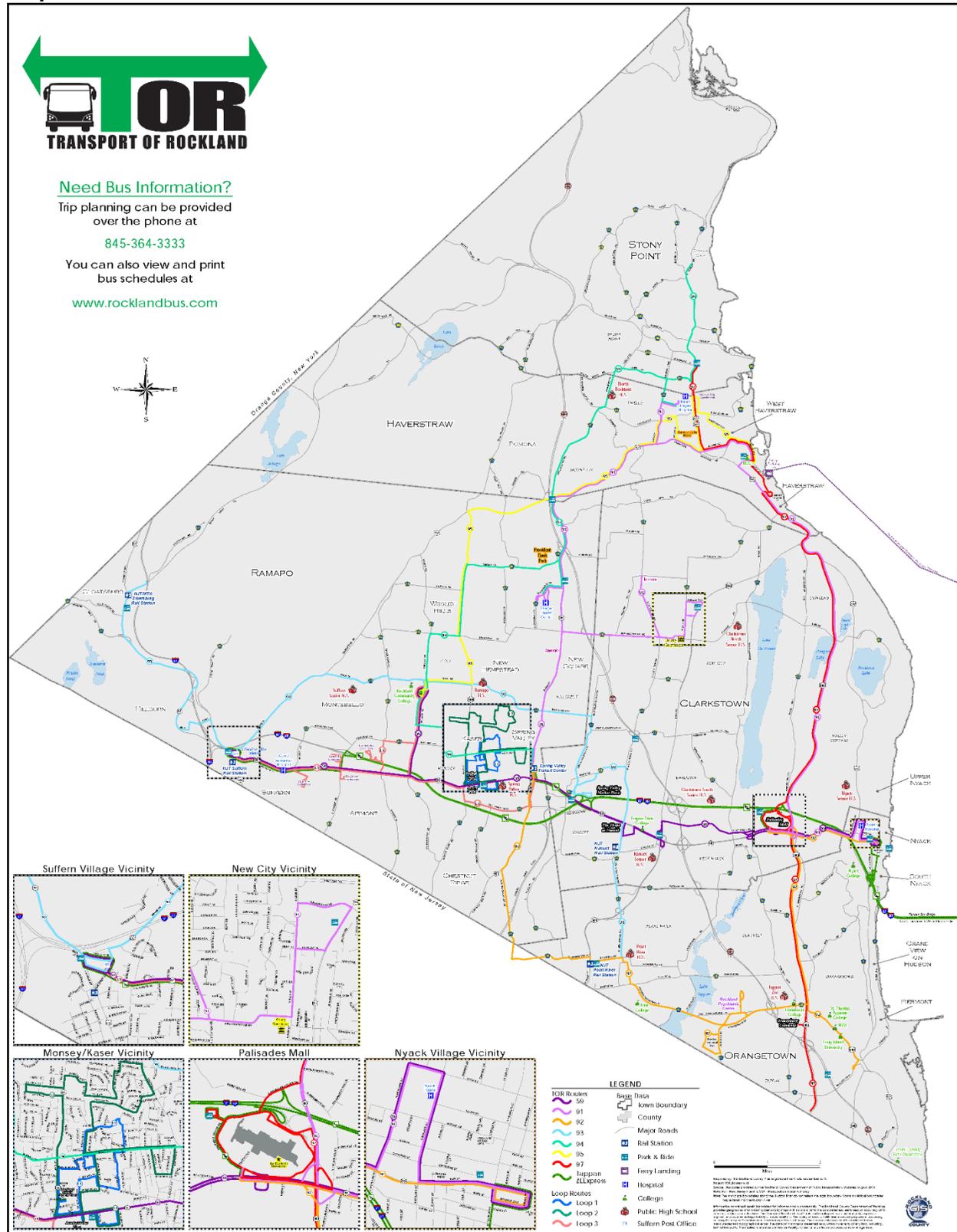
²⁴ *Rockland County Tomorrow: Rockland County Comprehensive Plan*, adopted 2011.

Map 4.8: Regional Transportation – Rail and Ferry

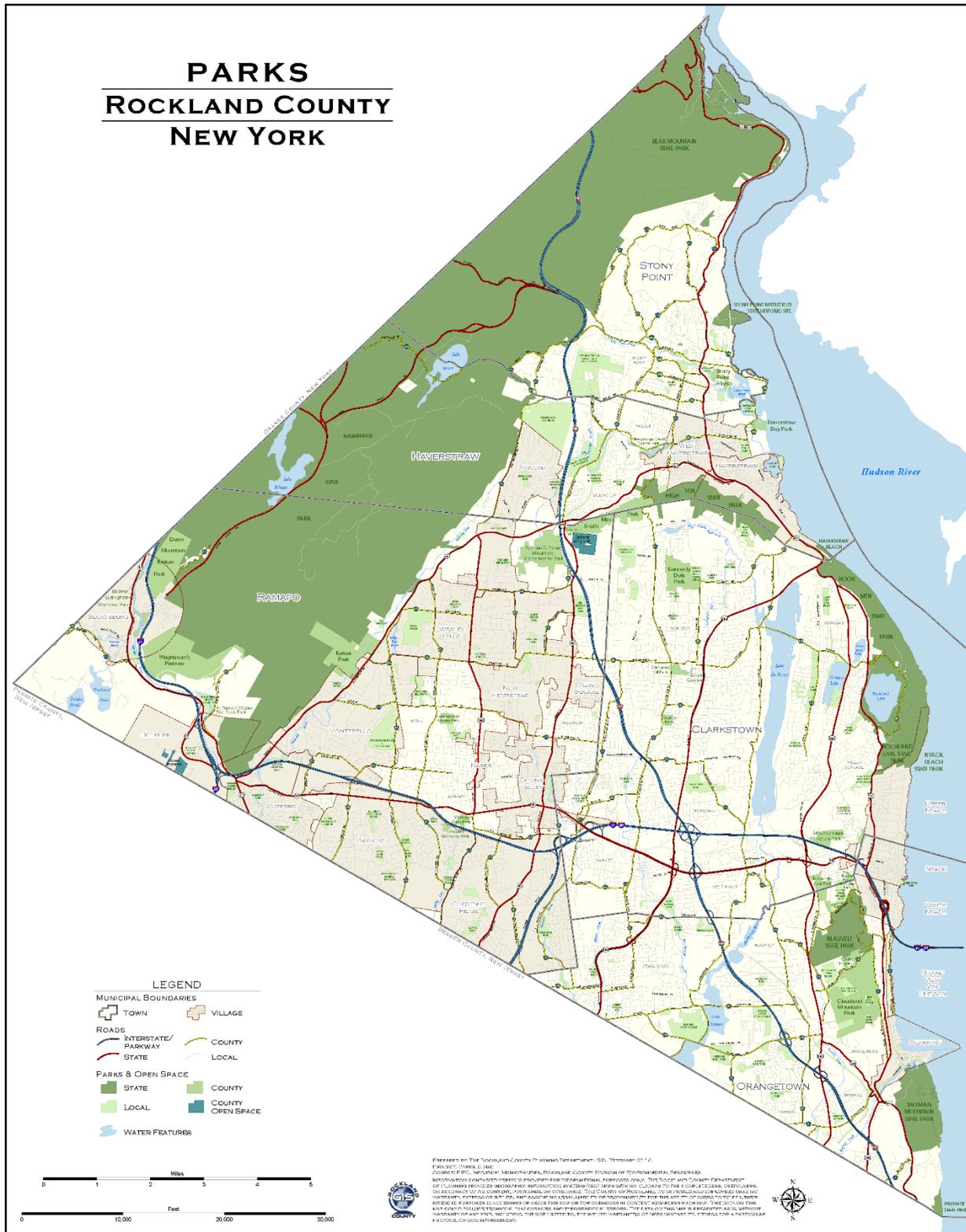


Source: Rockland County Planning Department, 2010.

Map 4.9: TOR and TZx Bus Lines



Map 4.10: Parks and Open Space in Rockland County



iii. Schools

Public education in Rockland County is generally very good. However, public education is administered through a fragmented system of eight (8) independent school districts, which exceeds the number of towns (5) in the County. The Haverstraw-Stony Point Central school district incorporates the entirety of the Town of Stony Point and the majority of Haverstraw, including the Villages of West Haverstraw and Haverstraw. The remaining portions of the Town of Haverstraw are served by either the Ramapo Central School District to the west or the East Ramapo Central School District. The hamlet of Nanuet, which is located in the Town of Clarkstown, is served by the Nanuet Union Free School District, which also extends into the northern portion of the County of Orangetown. The Clarkstown Central School District comprises the central and northern portions of the Town of Clarkstown, while the Nyack Union Free School District serves the Village of Upper Nyack in the Town of Clarkstown and the Villages of Nyack, South Nyack and Grand View on Hudson in the Town of Orangetown. The remaining portion of the Town of Orangetown is served by the South Orangetown Central School District and the Pearl River Union Free school district.

Among the school districts located in Rockland County, the East Ramapo Central School District is the only district that was labelled as a high need school district by the New York State Department of Education. This school district has the largest number of students, number of minority students, students with disabilities, students with limited English proficiency (LEP) and economically disadvantaged students. The Haverstraw – Stony Point Central School District also has the second largest student body and also has high numbers of minority, LEP and economically disadvantaged students, although the number of Black students, LEP students and economically disadvantaged students is significantly lower than that of the East Ramapo Central School District. These data differ significantly from the other school districts in the County – see Table 4.7.

Table 4.7: Composition of the School Districts in Rockland County (2013-2014)

School District	Total Students	Student Demographics				
		Black	Hispanic	LEP	With Disabilities	Economically Disadvantaged
Clarkstown Central	4,429	4%	13%	2%	15%	10%
East Ramapo Central	8,174	43%	46%	27%	20%	83%
Haverstraw-Stony Point Central	7,905	12%	50%	12%	11%	47%
Nanuet Union Free	2,244	5%	15%	4%	10%	15%
Nyack Union Free	2,931	19%	19%	5%	12%	26%
Pearl River Union Free	2,573	1%	9%	1%	11%	7%

Ramapo Central	4,474	5%	16%	3%	13%	20%
South Orangetown Central	3,267	2%	11%	3%	9%	12%

Source: New York State Education Department (2013-2014 school year).

Note: Highlighted rows represent the three lowest performing school districts in Rockland County.

The results of an analysis of the demographic and economic profile and proficiency of each of the eight (8) school districts in Rockland County indicate that the size of the student body (for the two largest districts), number of minority students, LEP students and economically disadvantaged students are disproportionately high in the lowest performing districts. The number of students in each of these categories is highest in the East Ramapo Central School District and second highest in the Haverstraw- Stony Point Central School District, which rank last and second last in student performance, respectively. Nyack Union Free School District, the third worst performing school district, has the third highest rates of minority students and economically disadvantaged students. These school districts have the highest concentrations of low and moderate income minority populations, as identified in Maps 4.5 and 4.6, above.

As stated above, the East Ramapo Central School District is the lowest performing school district, with graduation English/math proficiency rates that are significantly lower than that of the seven (7) other districts – see Table 4.8. Although the East Ramapo Central School District had an average graduation rate of 60 percent in the spring of 2014, the graduation rates for the other school districts ranged from 82 percent for the Nyack Union Free School District to 95 percent for the Nanuet Union Free School District. Similarly, the English Language Arts and Math proficiency rates for East Ramapo Central were 14 percent and 15 percent, respectively, compared with 33 percent and 30 percent for the second lowest performing school district (Haverstraw – Stony Point Central).

Table 4.8: School District Performance in Rockland County (2013-2014)

School District	ELA* Proficient	Math** Proficient	Graduation Rate***
Clarkstown Central	49%	55%	94%
East Ramapo Central	14%	15%	60%
Haverstraw- Stony Point Central	33%	30%	82%
Nanuet Union Free	57%	61%	95%
Nyack Union Free	34%	35%	83%
Pearl River Union Free	49%	59%	90%
Ramapo Central	41%	61%	94%
South Orangetown Central	43%	54%	92%

Source: New York State Education Department (2013-2014 school year).

*Reflects English Language Arts assessments conducted by the State Board of Regents for grades 3 – 8 in the spring of 2014.

**Math assessments conducted by the State Board of Regents for grades 3 – 8 in the spring of 2014.

***Graduation rates for spring 2014.

The East Ramapo Central School District experiences severe financial and political issues due to the unique demographic profile of the area. In November 2014, the Fiscal Monitor for the New York State Education Department released a Report of Investigation identifying the East Ramapo Central School District as one in crisis.²⁵ The report states that 9,000 students attend public schools in the district, 91 percent of whom have African-American, Latino and Haitian backgrounds and 78 percent of whom qualify for free and reduced price lunches. The student population also has a fast-growing segment of limited English proficient students. On the other hand, there are an estimated additional 24,000 Orthodox Jewish students who attend over 50 private schools, many of whom have disabilities and require special education services. The school budget currently provides transportation for at least 23,500 private school students and significant special needs resources for private school students.

The Report estimates that the number of Orthodox Jewish students in private schools in this district could increase to as much as 50,000, putting a severe strain on school district resources.²⁶ The majority of the school board is represented by members of the private school community. The School District has the highest rate of budget rejection in the State, with proposed budgets defeated by popular vote 8 of the last 12 years. The school district has operated under a deficit for 7 of the last 10 years and has depleted its restricted funds, which the New York State Education Department has attributed to poor financial practice and a lack of strategic long term plans.

The assessment of public school children conducted above indicates that minority children (Black/African American and Hispanic persons) who reside in areas with significant quantities of low and moderate income households (Nyack, Spring Valley, Haverstraw and West Haverstraw) experience disparities in access to good public schools compared with the other school districts in Rockland County. Children who attend schools in the East Ramapo Central School District experience significantly more disparities than children in any other school district in the County. The three lowest performing school districts face a number of challenges as a result of a high number of limited English proficient students, minority students and economically disadvantaged students, including significantly lower graduation rates.

The Report observes that the East Ramapo Central School District receives less funds from the State than state-wide averages and relies more significantly on local funds, indicating that minority children and Yiddish speaking children in this area experience disparities in educational funds compared with statewide averages. In his report of investigation, the Fiscal Monitor for the New York State Education Department stated that it will take years for the East Ramapo Central School District's public schools to recover from the budget cuts of the last few years. He also makes the following recommendations²⁷:

²⁵ Greenburg, Henry M. *Report of Investigation, East Ramapo: A School District in Crisis*, November 17, 2014.

²⁶ *Ibid.*

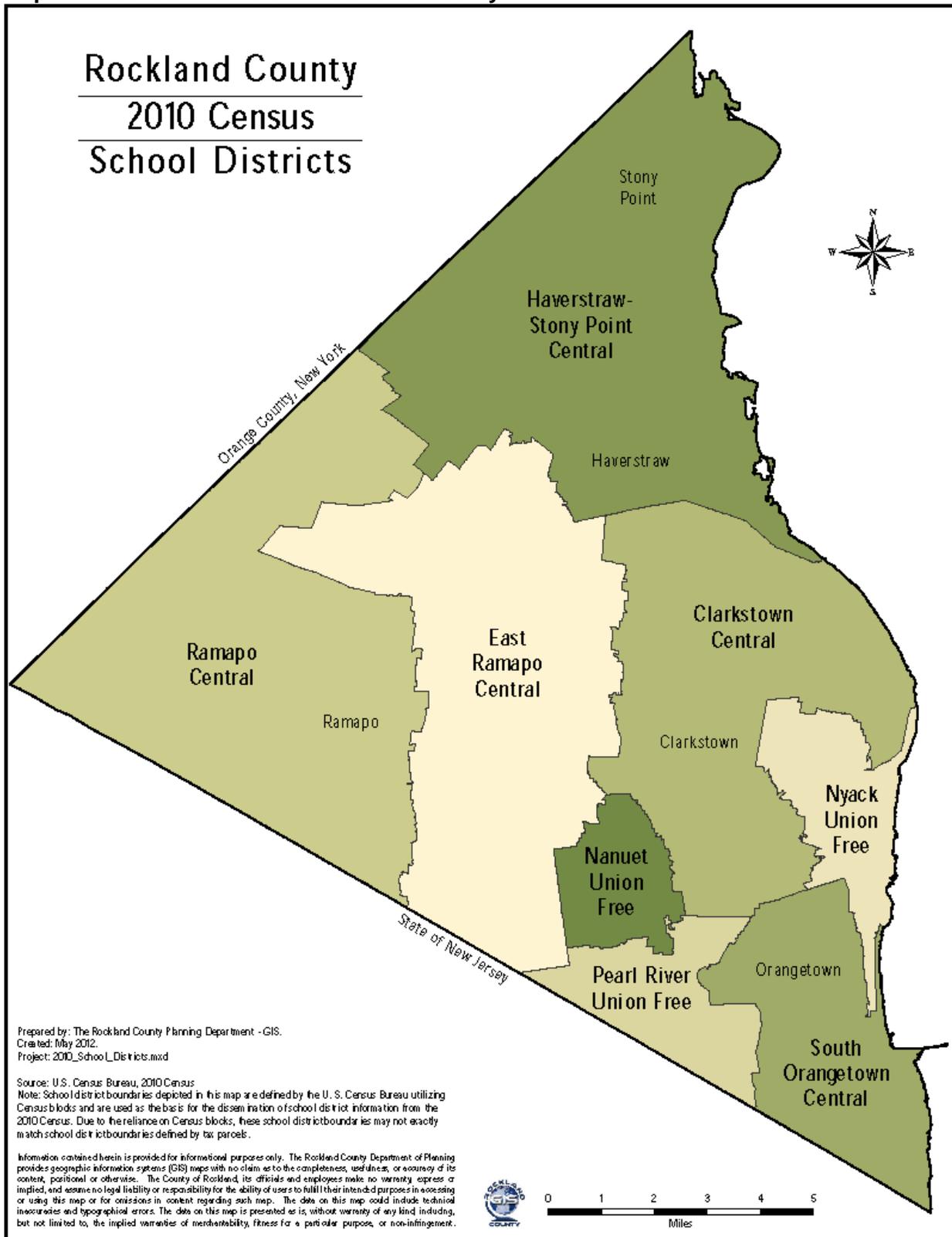
²⁷ Greenburg, Henry M. *Report of Investigation, East Ramapo: A School District in Crisis*, November 17, 2014.

1. Reform the district's governance structure to provide necessary checks and balances to the board and superintendent that protect public school students
2. Increase State funding to district above current levels
3. School Board should undergo training to ensure greater transparency
4. School Board should undergo diversity training
5. School District should undergo State Education Department monitoring review to ensure appropriate services are provided to English Language Learners (ELLs) and immigrant students
6. Community leaders should work to bridge the divide between the public and private school communities

iv. Synopsis

Overall, the analysis of community assets above shows that the County's strongest community assets continue to be transportation and parks/open space. These assets serve residents of racially/ethnically concentrated areas of poverty fairly well. However, low and moderate income minority residents in Nyack, Haverstraw, West Haverstraw and particularly Spring Valley experience disparities in access to good public schools compared with other school districts in Rockland County.

Map 4.11: School Districts in Rockland County



Source: Rockland County Planning Department, 2012.

5. HOUSING DISCRIMINATION

This section presents and analyzes complaint data received from the New York State Division of Human Rights (NYSDHR), the Rockland County Commission on Human Rights (RCCHR) Fair Housing Board (FHB) and the U.S. Department of Housing and Urban Development. This section will also report the outcomes of any local market testing for discrimination, identify other fair housing concerns and review fair housing discrimination suits filed by the United States Department of Justice or private complaints, if any.

A. FAIR HOUSING COMPLAINTS

Fair housing practices are regulated through Federal, State and County laws and by certain non-profit agencies whose mission is to promote equal, affordable and accessible housing opportunities for all residents of the region, including Rockland County. See Table 5.1 as for an overview of the protected classes identified by each fair housing law. Complaints regarding fair housing practices can be lodged by aggrieved parties with the New York State Division of Human Rights (NYSDHR) or the Rockland County Commission on Human Rights (RCCHR) Fair Housing Board (FHB). See Sections i, ii and iii for an overview of each fair housing law. Both the State and County receive, investigate and make determinations regarding fair housing complaints, referring those claims with a determined causal basis relative to the protected classes to adjudication.

Table 5.1: Protected Classes (Federal, State and County)

Protected Class	Fair Housing Act (Federal)	Human Rights Law (New York State)	Fair Housing Law (Rockland County)
Race	√	√	√
Color	√	√	√
National Origin	√	√	√
Religion	√	√	√
Sex/Gender	√	√	√
Disability	√	√	√
Familial Status*	√	√	√
Age		√	√
Sexual Orientation		√	√
Marital Status		√	√
Military Status		√	
Creed		√	√

Source: U.S. Department of Housing and Urban Development, New York State Division of Human Rights and Rockland County.

* Although definitions of familial status varies, HUD defines it as families with children under 18 years of age.

i. U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) enforces the Federal Fair Housing Act, which prohibits discrimination in the sale, rental and financing of housing

based on race, color, national origin, religion, sex, disability and familial status. Fair housing complaints can be filed with the HUD Office of Fair Housing and Equal Opportunity by any entity (individuals and community groups) via phone, email or an online form. Once HUD has received the initial information, an intake specialist will contact the complainant. If the intake specialist determines that the matter is jurisdictional (i.e. involves housing discrimination), a complaint will be filed. HUD will then refer the complaint to two agencies that serve Rockland County as part of the HUD Fair Housing Assistance Program: the New York State Division of Human Rights (NYSDHR) and the Rockland County Commission on Human Rights (RCCHR) Fair Housing Board (FHB). Once referred, the agency must begin to work with the complainant within 30 days²⁸.

In response to a request from the County, HUD provided information on fair housing complaints HUD received originating in Rockland County between 1/1/2010 and 12/31/2014. These complaints represent the sum total of official complaints filed with HUD during this time period, and include complaints processed by the NYSDHR and RCCHR. During this period of time, HUD received a total of 51 complaints originating in Rockland (see Table 5.2). Nearly half of the complaints received by HUD originated in either Suffern or Spring Valley, with the remaining complaints dispersed among eight (8) additional jurisdictions or CDPs.

Table 5.2: Fair Housing Complaints Filed With HUD by Location (2010 - 2014)

Zip Code/Location	2010	2011	2012	2013	2014	TOTAL
10901 - Suffern	9	2	2	0	0	13
10952 - Monsay	0	1	2	0	0	3
10977 - Spring Valley	0	2	3	1	5	10
10954 - Nanuet	1	1	1	0	0	3
10965 - Pearl River	0	2	0	0	0	2
10968 - Piermont	1	1	0	0	1	3
10960 - Nyack	1	1	1	0	2	5
10989 - Valley Cottage	1	0	0	1	0	2
10956 - New City	2	1	0	1	0	4
10923 - Garnerville	0	0	1	0	0	1
10927 - Haverstraw	0	1	0	0	0	1
10980 - Stony Point	0	3	0	1	0	4
TOTAL	15	15	10	3	8	51

Source: U.S. Department of Housing and Urban Development, 2015.

Complaints reported to HUD can contain multiple bases – for instance, one complaint reported discrimination on the basis of both race and national origin. The most commonly reported basis of complaint was disability (15), followed by race (17) and national origin (15) – see Table 5.3.

²⁸ U.S. Department of Housing and Urban Development, *HUD's Title VIII Fair Housing Complaint Process*: http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process.

Table 5.3: Basis of Fair Housing Complaints Filed With HUD (2010 - 2014)

Basis of Complaint	2010	2011	2012	2013	2014	TOTAL
Color	1	2	1	1	0	5
Race	0	10	3	2	2	17
Religion	2	1	3	1	1	8
National Origin	2	4	5	3	1	15
Sex	1	2	2	0	1	6
Sexual Orientation	0	0	0	0	0	0
Disability	6	7	4	1	7	25
Retaliation	2	3	1	1	1	8
Familial Status	6	0	2	1	0	9

Source: U.S. Department of Housing and Urban Development, 2015.

Note: A single complaint may include multiple bases; totals do not depict actual number of complaints.

HUD closed a total of 48 complaints originating in Rockland County between 2010 and 2014, the majority of which were closed in 2011 and 2012. Seventeen (17) complaints were conciliated and 14 complaints were closed after a determination of no cause²⁹ - see Table 5.4. One complaint was closed for the reason of going to trial. The remaining complaints were either withdrawn after resolution, withdrawn with no benefits, or were subject to an administrative closing.

Table 5.4: Fair Housing Complaints Filed With HUD by Closure Type (2010 - 2014)

Year	Closed	Type of Closure					Trial
		Conciliated	No Probable Cause	Withdrawn After Resolution	Withdrawn	Admin Closing*	
2010	6	5	1	0	0	0	0
2011	15	5	5	2	2	1	0
2012	17	3	6	0	4	3	1
2013	4	1	1	1	0	1**	0
2014	6	3	1	0	0	2	0
TOTAL	48	17	14	3	6	7	1

*Admin closings reflect closing due to lack of jurisdiction, lack of cooperation from the complainant or inability to find the complainant.

**FHAP Judicial Dismissal.

Note: A single complaint may include multiple bases; totals do not depict actual number of complaints.

²⁹ Upon a request for clarification, NYSDHR defined a "conciliation agreement" as a mutually agreed conciliation with the complainant and respondent. NYSDHR defined "withdrawn with benefits" as a situation "when the complainant, acting on a self-motivated, voluntary basis, withdraws the complaint with some form of acceptable redress, e.g., reasonable accommodation for a disability, housing, rent reduction, cash payment, etc. All that is required is a withdrawal letter signed by the complainant, after which the Regional Director issues an order of withdrawal.

ii. New York State Division of Human Rights

The New York State Division of Human Rights (NYSDHR) enforces the State's Human Rights Law which prohibits discrimination based on age, sexual orientation, marital status and military status in addition to the protected classes identified by Federal law. The NYSDHR headquarters is located in the Bronx, and the regional office that serves Westchester, Orange, Putnam, Rockland and Dutchess Counties is located in Peekskill. In order to file a complaint, complainants need to contact the regional office and can download a complaint form from the NYSDHR website. A complaint form may be filed in person or by mailing in a form.

In response to a request from the County, NYSDHR provided information on fair housing complaints NYSDHR received originating in Rockland County between 1/1/2010 and 12/31/2014. NYSDHR received a total of 14 complaints from eight (8) different jurisdictions during this period of time (see Table 5.5). These complaints are also represented in the HUD tables above, but the data in this section provide information specific to complaints processed by NYSDHR.

Table 5.5: Fair Housing Complaints Filed With NYSDHR by Location (2010 - 2014)

Zip Code/Location	2010	2011	2012	2013	2014	TOTAL
10901 - Suffern	2	0	0	0	0	2
10941 - Nanuet	1	1	0	0	0	2
10968 - Piermont	1	0	0	0	1	2
10906 - Nyack	0	1	0	0	0	1
10956 – New City	0	1	0	0	0	1
10982 - Tallman	0	0	1	0	0	1
10982 – Stony Point	0	0	0	1	0	1
10977 – Spring Valley	0	0	0	0	2	4
TOTAL	4	3	1	1	2	14

Source: New York State Division of Human Rights, 2015.

Complaints reported to the NYSDHR can contain multiple bases – for instance, one complaint reported discrimination on the basis of both disability and race/color. The most commonly reported basis of complaint was disability (9), followed by race/color (5) – see Table 5.6.

Table 5.6: Basis of Fair Housing Complaints Filed With NYSDHR (2010 - 2014)

Basis of Complaint	2010	2011	2012	2013	2014	TOTAL
Race/Color	1	1	0	1	2	5
Creed (Religion)	0	0	0	0	0	0
National Origin	2	0	0	1	0	3
Age	0	0	0	0	1	1
Sex	0	0	0	1	0	0
Sexual Orientation	0	0	0	0	0	0
Disability	3	2	1	1	2	9
Retaliation	1	1	0	0	0	2
Familial Status	0	0	0	0	0	0

Source: New York State Division of Human Rights, 2015.

Note: A single complaint may include multiple bases; totals do not depict actual number of complaints.

NYSDHR closed a total of 11 complaints originating in Rockland County between 2010 and 2014, the majority of which were closed in 2010 and 2011 (see Table 5.7). Three complaints were conciliated – one of which was withdrawn with benefits and one of which was issued a pre-determination. The majority of the complaints (8) were closed after a determination of no cause³⁰.

Table 5.7: Fair Housing Complaints Filed With NYSDHR by Closure Type (2010 - 2014)

Year	Closed	Conciliated	Type of Closure		
			Type of Conciliation		No Probable Cause
			Withdrawn with Benefits	Pre-Determination	
2010	4	1	1	0	3
2011	3	1	1	0	2
2012	1	0	0	0	1
2013	1	0	0	0	1
2014	2	1	0	1	1
TOTAL	11	3	2	1	8

Source: New York State Division of Human Rights, 2015.

³⁰ Upon a request for clarification, NYSDHR defined a “conciliation agreement” as a mutually agreed conciliation with the complainant and respondent. NYSDHR defined “withdrawn with benefits” as a situation “when the complainant, acting on a self-motivated, voluntary basis, withdraws the complaint with some form of acceptable redress, e.g., reasonable accommodation for a disability, housing, rent reduction, cash payment, etc. All that is required is a withdrawal letter signed by the complainant, after which the Regional Director issues an order of withdrawal.”

iii. Rockland County Commission on Human Rights

The Rockland County Commission on Human Rights (RCCHR) Fair Housing Board (FHB) enforces the Rockland County Fair Housing Law, which prohibits discrimination based on age, race, color, religion, national origin, sex, sexual orientation, disability, marital status, or familial status in most housing-related transactions. The FHB consists of five (5) members of the RCCHR and has the authority to receive, investigate, initiate investigations, attempt to conciliate and, if necessary, adjudicate housing discrimination complaints related to unlawful discriminatory practices. The FHB Secretary also has the power to launch a Secretary-initiated investigation when the Board learns of allegations of unlawful discrimination in housing or housing-related transactions but does not have an aggrieved party to file a complaint.

The *FHB Enforcement Report – 2000-2014*³¹, which outlines information on fair housing complaints RCCHR received between 2000 and 2014, shows that the number of complaints filed with the FHB during this period of time ranged from four (4) in 2013 to thirty (30) in 2005. Disability is cited as the most common basis of housing discrimination in complaints filed with the FHB. RCCHR received a total of 44 complaints between 2010 and 2014: sixteen (16) in 2010, eight (8) in 2011, eleven (11) in 2012, four (4) in 2013 and five (5) in 2014 (see Table 5.8).

Table 5.8: Fair Housing Complaints Processed by RCCHR (2010-2014)

Basis	2010		2011		2012		2013		2014	
	#	%	#	%	#	%	#	%	#	%
Race	4	24%	3	38%	3	27%	2	50%	2	40%
Creed (Religion)	2	12%	0	0	6	55%	0	0	2	40%
National Origin	2	6%	2	25%	7	64%	1	25%	1	20%
Sex/Gender	0	0	0	0	1	9%	0	0	0	0
Sexual Orientation	0	0	0	0	0	0	0	0	1	20%
Disability	3	18%	4	50%	3	27%	1	25%	2	40%
Marital Status	8	47%	0	0	1	9%	1	25%	0	0
Familial Status	8	47%	0	0	3	27%	1	25%	0	0
Age	1	6%	1	13%	0	0	0	0	0	0
TOTAL*	16	---	8	---	11	---	4	---	5	---0

Source: Rockland County Commission on Human Rights, FHB Enforcement Report – 2000 – 2014.

*The sum of the number of complaints do not reflect the actual number of complaints because complaints may contain multiple bases.

Note: Percentages do not total 100 percent because complaints may contain multiple bases.

³¹ Rockland County Commission on Human Rights, *FHB Enforcement Report – 2000 – 2014*.

The FHB closed 24 complaints in 2010, seven (7) in 2011, twelve (12) in 2012, two (2) in 2013 and three (3) in 2014. There are six (6) possible outcomes for FHB complaints: the voluntary resolution of a complaint (conciliation); a no probable cause determination (NPC), a withdrawal of the complaint with some sort of beneficial outcome for the Complainant; a withdrawal of a complaint without any outcome or tangible benefit; the closure of a case when the FHB lacks jurisdiction or a complainant fails to cooperate or can no longer be located (Administrative Closure) or a hearing. See Table 5.9 for a breakdown of the outcome of all fair housing complaints closed by the FHB between 2010 and 2014. The majority of the fair housing complaints filed between 2010 and 2014 were conciliated and only one hearing was held, while the remaining complaints were either determined to have no probable cause, withdrawn or subject to an administrative closing.

Table 5.9: Fair Housing Complaints Closed by RCCHR (2010-2014)

Outcome	2010	2011	2012	2013	2014	2010-2014
Conciliated	18	5	2	2	2	29
NPC	4	1	1	0	0	6
Withdrawn	0	0	2	0	0	2
Admin. Closing	2	0	5	0	1	8
Hearing	0	1	0	0	0	1
TOTAL	24	7	12*	2	3	48**

Source: Rockland County Commission on Human Rights, FHB Enforcement Report – 2000 – 2014.

*The total of the various outcomes of complaints for 2012 do not match the sum of the complaints closed in 2012 in the FHB Enforcement report.

**The total number of complaints closed between 2010 and 2014 is 48 while the total number of complaints closed by outcome adds up to 46; this is due to a discrepancy in the FHB Enforcement Report outlining the outcome of complaints in 2012.

In addition to the 48 complaints processed by FHB between 2010 and 2014, FHB launched eight (8) Secretary-initiated investigations, seven (7) of which were initiated in 2010. All of the 2010 complaints involved real estate professionals and/or companies involved in the real estate industry and were filed on the basis of discriminatory advertising based on familial and marital status. Secretary-initiated investigations can be undertaken by FHB if they learn of allegations of unlawful discrimination in housing or housing-related transactions but do not have an aggrieved party to file a complaint.

B. TESTING

Westchester Residential Opportunities, Inc. (WRO) is a HUD approved housing counseling agency that provides services and programs that foster non-discriminatory housing opportunities for low and moderate income households, minorities, senior citizens and persons with disabilities, including the psychiatrically disabled. WRO receives housing complaints and attempts to mediate them prior to referring them to the State or County and operates a variety of programs that affirmatively foster and promote fair housing practices. WRO also conducts fair housing testing in the Lower Hudson Valley region of New York State.

Between 2009 and July 2010, WRO conducted 125 paired tests at real estate offices in Putnam, Rockland and Westchester Counties. This paired testing revealed that 21 percent of the paired tests overall produced unequal results between minority and non-minority testers, demonstrating that racial and national origin discrimination continued to impede equal housing opportunities in the Lower Hudson Valley. WRO concluded that the highest percentage of unequal tests came from real estate agencies in Rockland County, where WRO had not previously engaged in extensive fair housing education of real estate professionals. Rockland County has taken steps to address the issues revealed by the paired testing results, providing continuous funding for fair housing outreach from 2011-2014, the duration of the previous AI and Consolidated Plan. Activities funded included working with Legal Aid to educate very low income individuals on their rights and working with WRO to conduct public meetings providing fair housing education to home seekers and landlords within all of the County's towns and villages in 2012. At the time this Plan was published, WRO informed the County that the results of their 2013-2014 fair lending tests would be released in the summer of 2015, which includes some testing in Rockland County.

C. FAIR HOUSING DISCRIMINATION SUITS

At the time of this report, there were no pending fair housing discrimination suits involving Rockland County.

D. DETERMINATION OF UNLAWFUL SEGREGATION ORDER

At the time of this report, there is no pending unlawful segregation order involving Rockland County.

6. REVIEW OF PUBLIC SECTOR POLICIES

Government regulations can affect housing availability and costs by limiting the supply of buildable land, setting standards and allowable densities for development, and exacting development fees. Publicly imposed constraints on housing supply can subsequently lead to fair housing concerns, as particular segments of the population lose access to affordable homes. This can also include indirect public policies such as taxes and building codes. This section examines these public sector constraints in more detail to evaluate their impact on fair housing choice in Rockland County.

A. RESIDENTIAL DWELLING UNITS AND ACCESSIBILITY

People with disabilities in Rockland County are protected against housing discrimination and entitled to certain accommodations by a series of Federal, State and local human rights and civil rights laws, including Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Fair Housing Act and the New York State Human Rights Law.

The U.S. Department of Housing and Urban Development (HUD) adopted Fair Housing Accessibility guidelines in 1991 to provide guidance to housing providers. In addition to the required standards, HUD encourages the incorporation of “visitability” into the design of new housing. Housing that is “visitable” has a basic level of accessibility that enables persons with disabilities to visit friends, relatives and neighbors in their homes.

All new housing and rehabilitated housing of four or more units must follow New York State building code accessibility guidelines for the disabled. This means that first floor units must be handicapped adaptable. As the majority of the County’s multi-family buildings were constructed prior to the March 13, 1991 enactment of the accessibility requirements of the Fair Housing Act, older multi-family structures are often exempt from accessibility requirements. The various Department of Buildings and similar departments at the jurisdiction level reviews all plans for new construction and substantial rehabilitation to ensure that relevant local, state and federal accessibility standards are complied with in new and rehabilitated residential units. The Department of Buildings or similar department at the jurisdiction level also enforces maintenance and housing standards included in the municipal code.

According to advocacy organizations for persons with disabilities, the limited availability of affordable and accessible housing units is a significant impediment to fair housing choice in Rockland County. One out of every two housing discrimination complaints in the County processed by HUD, NYSDHR and RCCHR were filed by persons with disabilities, who frequently report barriers to obtaining reasonable accommodations or modifications. The age of the County’s housing stock and associated cost of retrofitting older structures is a significant impediment.

Landlords of new or rehabilitated buildings (with 4+ units) are responsible for providing an accessible building entrance on an accessible route, accessible common and public use areas, usable doors, an accessible route into and through the dwelling unit, accessible light switches, electrical outlets, thermostats and other environmental controls, reinforced walls in bathrooms for potential installation of grab bars and usable kitchens and bathrooms. As landlords are not

required to pay for further accommodations/modifications within a unit, these are the responsibility of the disabled person. Because persons with disabilities are disproportionately poor, the cost of modifications can be unattainable. This also applies to single family homes and may impede a disabled senior citizen from aging in place.

B. LANGUAGE ACCESS FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

HUD uses the prevalence of persons with Limited English Proficiency (LEP) to identify the potential for impediments to fair housing choice due to their inability to comprehend English. HUD entitlement communities are required to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964. In 2007, HUD issued a *Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons* providing guidance to recipients of HUD funding. HUD recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP. As stated in Section 3, subsection B.i.a of this AI, which addresses demographic trends of groups representing national origin (including LEP persons), an estimated 16.5 percent (47,944 persons) of Rockland County residents above the age of 5 spoke English less than “very well” in 2013.

The County outlines its policies for accommodating the needs of Non-English speaking persons in its Citizen Participation Plan. The County has established procedures for the dissemination of program materials and notices of hearings to non-profit agencies serving the County’s Spanish-speaking population, the largest LEP group in the County. When the County has reason to believe that a significant number of a specific linguistic group may require assistance, the County will provide interpreters. Additionally, the County always ensures that it has several bilingual staff members on location at the various departments who speak a range of languages. These bilingual staff members are able to verbally translate for LEP persons and are available on call when needed.

HUD recipients are strongly urged to provide written translation of vital documents for each LEP language group that constitutes 5 percent or 1,000 of the population. Five (5) Limited English Proficiency (LEP) groups in the County meet these thresholds. The Spanish/Spanish Creole (18,404 persons) LEP group is the only group that exceeds 5 percent of the County’s population (6.3%). The LEP groups that do not meet the 5 percent threshold but exceed 1,000 of the County’s population are the Yiddish (12,311 persons), French Creole (5,654 persons), Chinese (1,336 persons) and Russian (1,043 persons) LEP groups. In order to serve the largest LEP group, the County currently provides both English and Spanish translations for Consolidated Planning notices for public hearings and community surveys in the local newspapers and on the County website.

C. LAND USE AND LAND USE REGULATION

New York State regulations provide home rule powers to New York State local governments, which rank among the most far-reaching in the country. Home rule is defined as typical government functions reserved for local governments without interference by New York State, essentially making each local government a full partner with the State in the shared responsibility for providing services to its residents.³²

New York State regulations provide the Rockland County Legislature with the power to enact local laws, acts and resolutions. However, New York State regulations do not give counties the authority to zone.³³ This responsibility falls on the shoulders of local government, which is comprised of counties, cities, towns and villages. Under New York State law, counties, cities, towns and villages are corporate entities known as municipal corporations. As there are currently no cities located in Rockland County, this analysis will not address the home rule powers of cities any further. The role of these units of local government is to provide most local government services, although there are certain exceptions (i.e. special-purpose governmental units). The role of each type of local government is as follows:

County

New York State counties have limited land use regulatory authority, as the majority of the land area and these functions are specifically relegated to cities, towns and villages through the General Municipal Law. This means that the governmental powers of zoning and subdivision regulations, the primary tools for controlling or implementing plans, are often not under the direct control of Rockland County. However, under Section 239(m), certain projects must be referred to the County Planning Board. As the Rockland County charter gives the Department of Planning the authority of a Planning Board, the projects must be referred to the Rockland County Department of Planning (see Section i below for additional information).

Towns

Towns are subdivisions of counties and may include villages within their boundaries. Each town is governed by a town board with a chief elected official (town supervisor) and four elected councilwomen/councilmen. Rockland County has five towns: Clarkstown, Haverstraw, Orangetown, Ramapo and Stony Point.

³² *New York State Local Government Handbook*, Chapter IV, Introduction, Government Home Rule Power.

³³ *Ibid.*

Villages

Villages are areas of New York State that have been incorporated by local action in accordance with New York State law. Each village is governed by an elected board of trustees that is led by a mayor. Rockland County has 19 villages.

i. Rockland County Planning Framework

a. Municipal-Level Planning

At the municipal level, the local legislative body, the zoning board of appeals and the planning board are the three principal agencies that develop, document and implement planning policies. These local agencies must also coordinate some activities with the County Planning Board in its role as an advisory body to the 24 towns and villages within Rockland County that have land use regulatory authority.

The local legislative body creates the planning board and authorizes it to undertake planning activities in accordance with General City, Town or Village Law, as applicable, and has direct authority over specific planning actions such as the preparation, adoption and revision of a community's comprehensive plan through the passage of a local law, the adoption or amendment of a zoning ordinance or zoning map, appointment of residents to serve on the Planning Board and other administrative and advisory boards and the retention or delegation of authority to grant special use permits.

The Zoning Board of Appeals is an administrative and quasi-judicial body that does not have legislative powers. The primary responsibilities of this Board include interpreting the zoning ordinance and granting variances in accordance with the General Town or Village laws. The Board is also responsible for granting special use permits and conducting site plan review when provided authority by the local legislature.

The Planning Board is an administrative body with no legislative powers, and some of the Board's primary responsibilities are undertaken only if granted the authority by the local legislature: reviewing and approving site plans, special permits and participating in the preparation of a comprehensive plan. Additional responsibilities include reviewing and approving subdivision plans, preparing land subdivision regulations and recommending their adoption to the local legislature, reporting on matters referred to by the local legislature, advising the local legislature and preparing other regulations regarding subject matter within the Board's jurisdiction.

b. County-Level Planning

The County Planning Board is outlined in the Rockland County Charter and Administrative Code as a nine-member board with at least one member from each town. The Board is responsible for advising the Commissioner of Planning, the County Executive and the

Legislature on issues related to planning as well as performing related duties as required by the Commissioner of Planning and the County Executive.

The County Department of Planning is granted the authority of a County planning board in Article V of the Rockland County Charter. The Commissioner of Planning, who is appointed by the County Executive and subject to confirmation by the Legislature, is responsible for developing a capital program for the County, assisting in the planning of all capital projects and referring projects that, under Section 239(m) of the New York State General Law, must be referred to the County Planning Board. Under Section 239(m), if a town or village undergoes an adoption of or amendment to a comprehensive plan, adoption or amendment of a zoning ordinance or local law, issuance of special permits (or conditional use permits), approval of site plans, granting of use or area variances or other authorizations which a referring body may issue under the provisions of any zoning ordinances (i.e. change of zone), must be referred to the Commissioner of Planning if it is within 500 feet of any of the following:

- A municipal boundary.
- A boundary of an existing or proposed state or county park or recreation area, including the Long Path.
- The right-of-way of any existing or proposed County or State parkway, through expressway, road or highway (including the Palisades Interstate Parkway and the New York State Thruway).
- A right-of-way for any existing or proposed stream or drainage channel owned by the County or for which the County has established channel lines
- Existing or proposed boundary of any County or State owned land on which a public building or institution is situated.

The purpose of the referral requirement is defined by the New York State General Municipal Law as a way to “review proposed actions referenced for inter-community or county-wide considerations subject to the provisions of this section.³⁴” In this context, the Rockland County Department of Planning considers its primary responsibilities to encourage planning that “looks at the big picture, incorporating land-use and transportation, planning measures together with the needs of the community.³⁵” The overarching goal of the Department of Planning is to appropriately guide municipal planning decisions through the use of the guidelines set forth by the New York State General Municipal Law, the Official County Map and the County’s Comprehensive Plan.

ii. Planning Tools

a. Zoning Ordinance

The act of zoning is the division of a municipality into districts or zones and the regulation of the use, lot size, location and dimensions of structures within each of these districts. Zoning

³⁴ New York State, General Municipal Law, Chapter 239-l.

³⁵ Rockland County, Department of Planning website.

guides future development but is typically not an effective tool for correcting existing conditions.

b. Land Subdivision Regulations

Subdivisions control the process by which land is divided into lots and establish infrastructure requirements and standards (i.e. roads and drainage systems).

c. Site Plan Approval

A site plan review is the review of the layout, design and other details of a proposed use of a single parcel of land and is typically required for office, retail, multifamily, institutional, industrial and commercial uses. In most cases, a municipality's zoning ordinance specifies the types of uses subject to site plan review.

d. Special Use Permits

A special use permit allows a specific land use that is permitted in the zoning ordinance if certain requirements are met. A municipality's schedule of uses typically lists the uses within each district that are subject to a special use permit, if any.

e. Variances

An application for a variance is submitted to the appropriate approving body when a proposed project includes a use (use variance) or dimensions (area variance) that is not permitted in a zoning district.

f. Comprehensive Plan

A comprehensive plan is a tool to assess existing conditions and needs and to establish objectives for future development. While a comprehensive plan is not required in New York State, if a municipality chooses to develop one, New York State laws mandate that all land use regulations are in accordance with a comprehensive plan.

g. Cluster Development

A cluster subdivision is an arrangement of buildings or lots on land in which lot size or setback regulations are reduced without an increase in the number of lots that would be permitted in a subdivision. Subdivision regulations or zoning ordinances may contain provisions that enable a developer to modify minimum lot size and other dimensional requirements as part of the subdivision approval process. This allows for a grouping of dwelling units on one or more portions of the site, with the remainder set aside as common open space. A Town has the authority to enact cluster development for any type of development permitted by the zoning ordinance, while a Village is limited to residential

development. Cluster development is sometimes outside of the zoning ordinance in other chapters of the municipal Code.

iii. Zoning Regulations in Rockland County

a. Overview and History

Given the fragmented nature of Rockland County's regulatory and planning environment, a broad range of jurisdictions maintains policies and ordinances that have the potential to raise fair housing concerns. Local zoning ordinances in particular can impact the production of multifamily housing, accessory dwelling units, emergency shelters, transitional housing and community care facilities, all of which serve lower income households and special needs populations. Many jurisdictions in the County do not currently have land use policies and zoning in place which would permit the development of a full range of choices to meet the County's diverse housing needs and facilitate fair housing choice for all segments of the population. As noted above, all 24 municipalities in Rockland County have land use regulatory authority and have enacted their own zoning codes. This means that land use in Rockland County is governed by 24 local zoning ordinances, with the provisions of these ordinances varying significantly from one community to another.

There have been several landmark zoning cases regarding the Town of Ramapo. In the *Golden vs. Planning Board of Ramapo* case in 1972, the petitioners sought an order reviewing and annulling a decision and determination of the Planning Board denying their application for preliminary approval of a residential subdivision plat. The Planning Board made this determination because of land use laws linking subdivision approval to the provision of adequate public facilities, which were made in 1969 amendments to the Town of Ramapo zoning ordinance based on the Town's comprehensive plan. The case established the legality of regulations that control development timing and phasing and created a legal link between comprehensive planning and local capital improvement activities.

In the *Rockland County Builders Association, Inc. vs. John McAlevey* (Constituting the Town Board of the Town of Ramapo in 1972), the plaintiffs (Rockland County Builders Association et al) sought to set aside the ordinance as unconstitutional. One of the plaintiffs, Mildred Rhodes, submitted a preliminary plat approval for her parcel of property that was subsequently denied by the Ramapo Planning Board on the grounds of failure to obtain a special permit as required under the 1969 amendments, with specific requirements for the provision of public facilities. Under the new amendments, an application for a special permit would be denied unless it complied with the requirements to provide adequate public facilities. The previous *Golden vs. Planning Board of Ramapo* decision was upheld.

In 2007 the *Shapiro v. Town of Ramapo* and *Village of Chestnut Ridge et.al (including the Villages of Montebello, Pomona and Wesley Hills) v. Town of Ramapo Town Board* were brought to the Appellate Division of the Supreme Court of New York. The cases were brought forth after the Town of Orangetown sold an undeveloped 200 acre parcel of land

known as Patrick Farms located in the Town of Ramapo to a developer. The Town of Ramapo amended the zoning code to allow multifamily development for adult students and undertook the environmental review for the rezoning and proposed project. This rezoning paved the way for a project that would create 497 units including 314 multifamily townhouses, 87 single family homes and more than 70 condominiums on previously undeveloped land. The lawsuits made a number of arguments, including contending that the public input and environmental review procedure for undertaking the rezoning was flawed. The Supreme Court dismissed the plaintiff's arguments. In 2012, an appeal by the plaintiffs was heard by the Supreme Court, resulting in the reinstatement of the majority of their arguments and the referral of the case for further determination. In 2013 a New York State Supreme Court justice dismissed these lawsuits, which allows the project to move forward.

b. Analysis of Zoning Regulations

At approximately 176 square miles, Rockland County is geographically the smallest county in New York State, outside of the five boroughs in New York City. With nearly 40 percent of its land area devoted to preserved parkland and open space and approximately 40 miles of Hudson River waterfront, the zoning codes enacted in each of the jurisdictions often address the geographic features of an area. Today, land uses in Rockland County include a variety of land uses, including traditional mixed-use, relatively dense village and hamlet centers, lower density suburban residential areas, regional shopping centers and light industrial parks. Single family residences represent the largest category of developed land uses, covering more than 28 percent of the total land area in Rockland County.³⁶ Concentrated areas of medium and higher density residential uses are located primarily in village centers and along major roadways throughout the County. These land uses represent approximately 3 percent of the County's total land area, while mixed use development comprises less than 1 percent of the County's total land area.

In order to conduct the review and analysis of all 24 municipal zoning ordinances, the County obtained 14 from the web-based *eCode360 Library* and four (4) from municipal websites. For the six (6) not available online, a request was made to the municipality to provide a hard copy. At the time of this analysis, efforts to obtain the zoning ordinances for the Villages of Grand View and Suffern were unsuccessful following several requests. As such, these zoning ordinances are not included in this analysis. The web-based codes are updated by the municipality as the codes are amended and are generally considered the most up to date source of information. However, there may be lags between the adoption of code amendments and the posting of the amendments online. See Appendix B for the detailed zoning analysis, including a table that outlines each jurisdiction's zoning districts and the types of residential use allowed (if allowed) and a table that provides information on the requirements outlined for each identified district that allows multifamily use.

³⁶ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, adopted March 1, 2011.

For purposes of this analysis, “multi-family” housing is defined as a structure with three or more separate dwelling units, none of which are “accessory apartments.” Furthermore, a “two-family dwelling” is defined as two dwelling units in one structure on a single lot, neither of which is an “accessory apartment.” This analysis does not assess permitted two family uses (or larger) as a result of accessory apartments, as the analysis is intended to provide a general initial snapshot of whether the zoning ordinances of municipalities permit multifamily development, which can pave the way for affordable housing development. Cluster development, as explained above, is a tool that municipalities can use to regulate land use and is sometimes specified outside of the zoning ordinance in other chapters of the municipal Code. Cluster development regulations and policies are not assessed in this analysis.

Town of Clarkstown

The Town of Clarkstown is located north of Orangetown and east of Ramapo and has an estimated population of 83,870 in 2011, an increase of 2.2 percent from 2000.³⁷ The Village of Upper Nyack and portions of the Villages of Nyack and Spring Valley are located in the Town. Eight (8) hamlets are also located in the Town: Bardonia, Central Nyack, Nanuet, New City, Rockland Lake, Valley Cottage and West Nyack. More than 20 percent of the Town’s land area is comprised of water bodies or public and private open space, while 40 percent of the Town’s population resides in New City, the County seat.³⁸ Most of the Town’s 41 square miles has been either developed or preserved as open space, although the County’s 2011 Comprehensive Plan identified development potential in specific large vacant parcels and suggests that areas of the Town may need to evaluate potential redevelopment options such as changes to existing land uses, to meet future needs. The Town’s 2009 Comprehensive Plan calls for a variety of housing options to be developed throughout the Town, including senior, workforce and affordable housing, including mixed use development. In accordance with the Town’s Comprehensive Plan, new zoning has been developed to permit apartments over businesses in some of the Town’s hamlet centers and has facilitated additional senior housing development.³⁹

In 2007, the Town established the Active Adult Residence (AAR) Zone, a floating zone that was established as eligible in specific districts. The senior housing components allowed by special permit that are listed in Table 6.1 below reflect districts that currently have AAR Zones. The resolution states that the purpose of the AAR Zone is to accommodate a range of independent living accommodations for active adults. As part of this objective, the AAR Zone requires the provision of affordable housing as a portion of age-restricted housing development in the community.⁴⁰ The Town passed legislation requiring that 10 percent of

³⁷ 2007-2011 American Community Survey, U.S. Census Bureau.

³⁸ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, adopted March 1, 2011.

³⁹ Town of Clarkstown, Letter to S.Nagubandi, Director of the County of Rockland County Office of Community Development, June 4, 2015.

⁴⁰ Town of Clarkstown, Resolution - *A Local Law Amending Local Law No. 2-1974 Amended: Creation of the AAR (Active Adult Residential) Zoning District*, 2007.

units in all new senior housing developments be set aside for affordable units. Currently, three unincorporated areas of the Town (Nanuet, Bardonia and New City) contain 407 public and/or assisted housing units.

The Town of Clarkstown currently has 20 zoning districts, 11 of which allow residential use and 9 of which do not allow residential uses.⁴¹ Currently, 8 of the 13 residential zones allows for multifamily development. Of the 8 zones that allow for multifamily development, three allow the development of only senior multifamily housing with a special permit. The remaining five (5) zoning districts allow for the as of right development of specified types of development and allows additional types of multifamily uses by special permit, which varies by district.

Village of Upper Nyack

The Village of Upper Nyack is situated on the eastern border of Clarkstown, adjacent to the Village of Nyack to the south and Hudson River to the east. The Village of Upper Nyack had an estimated population of 2,039 in 2011, an increase of 9.4 percent from 2000.⁴² The Village of Upper Nyack currently has nine (9) zoning districts, 5 of which allow as of right single family residential use only.⁴³ The office business district currently allows single family residential use by special permit. The Village of Upper Nyack does not have an affordable housing provision, nor does it have any multifamily residential districts, and currently allows multifamily use by Special Permit only through the conversion of buildings constructed prior to the effective date of the Zoning Ordinance (January 18, 1962). A search for the keywords “affordable” and “multifamily” and “multiple” on the Village’s website and zoning code indicates that there is currently no provision specifying the development of new multifamily residential buildings. There are currently no public or subsidized housing units in the Village of Upper Nyack.

Town of Haverstraw

The Town of Haverstraw extends from the Hudson River to the east to the Harriman State Park and Orange County to the west and was estimated to have a population of 36,266 in 2011, an increase of 7.3 percent from 2000.⁴⁴ The Town is bordered by the Town of Stony Point to the north and the Towns of Clarkstown and Ramapo to the south. The Villages of Haverstraw and Pomona are located within the Town, while the Village of Pomona is located in both the Towns of Haverstraw and Ramapo. More than half of the Town’s land area is devoted to open space, and a number of land uses can be found in the developed portions of Town of Haverstraw, as the Town has industrial riverfront uses on the Hudson River, traditional dense mixed uses in the Village of Haverstraw and low-density residential areas

⁴¹ Town of Clarkstown Town Code, Chapter 290: Zoning, retrieved from eCode 360 on May 22, 2015.

⁴² 2007-2011 American Community Survey, U.S. Census Bureau.

⁴³ Village of Upper Nyack Zoning Code, retrieved from <http://uppernyack-ny.us/doc-type/village-code/> on May 22, 2015.

⁴⁴ 2007-2011 American Community Survey, U.S. Census Bureau.

on the central and western portions of the town.⁴⁵ The 2011 Rockland County Comprehensive Plan identified the Town of Haverstraw as the Town with the most diverse housing stock in the County, as it contains housing types that range from single family residents to multifamily dwellings.

The Town Board currently acts as the Affordable Housing Review Department, which is responsible for the administration of affordable housing, including designating the maximum price and income eligibility requirements for each unit and maintaining information and documentation regarding the number of affordable housing units.

The Town of Haverstraw currently has 11 zoning districts, five (5) of which permit as of right residential use. Of these five (5) residential zoning districts, the General Residence district permits as of right multifamily development, requiring a minimum lot size of 5 acres.⁴⁶ The Waterfront Recreation Development currently permits multifamily use for lots 25 acres or larger, subject to special permit approval by the Town Board.

Village of Haverstraw

The Village of Haverstraw is located in the eastern portion of the Town of Haverstraw adjacent to the Hudson River to the east, the Town of Clarkstown to the south and the Village of West Haverstraw to the north. The Village was estimated to have a population of 11,711 in 2011, an increase of 15.8 percent from 2000.⁴⁷ Most of the affordable housing available in the Town of Haverstraw is concentrated in the Village of Haverstraw, which has adopted a Residential Inclusionary Zone (RIZ) for affordable housing.⁴⁸ The Village of Haverstraw currently contains 210 subsidized housing units. The Village has committed to growing through the implementation of multifamily housing projects on redevelopment sites and ensuring that the housing stock remains affordable for its “affordable” community in the long run.⁴⁹

There are 13 zoning districts in the Village of Haverstraw, one of which functions as an overlay zone and refers to applicable use and bulk regulations of the districts of subject parcels.⁵⁰ Of the remaining 12 zoning districts, nine permit residential use. Five zoning districts permit a variety of multifamily residential uses, including multifamily residences for condominium or cooperative ownership, for persons ages 55 and above and for residential use above commercial spaces.

⁴⁵ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, adopted March 1, 2011.

⁴⁶ Town of Haverstraw Town Code, Chapter 167: Zoning, retrieved from eCode 360 on May 22, 2015.

⁴⁷ *2007-2011 American Community Survey*, U.S. Census Bureau.

⁴⁸ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, adopted March 1, 2011.

⁴⁹ Village of Haverstraw, Letter to S.Nagubandi, Director of the County of Rockland County Office of Community Development, June 2, 2015.

⁵⁰ Village of Haverstraw Village Code, Chapter 245: Zoning, retrieved from eCode 360 on May 22, 2015.

Village of Pomona

The Village of Pomona is 2.4 square miles in size and is located in both the Town of Haverstraw and the Town of Ramapo. The Village was estimated to have a population of 6,668 in 2011, an increase of 17.3 percent from 2000.⁵¹ The Village's land use is comprised almost entirely of low density single family land uses, which corresponds with Village's Zoning Ordinance. The Village of Pomona is encompassed by a single zoning district that allows for single family residential use with limited special permit uses and does not allow multifamily uses.⁵² The Village does not have an affordable housing ordinance, and there are no public and/or subsidized housing units in the Village of Pomona.

Village of West Haverstraw

The Village of Haverstraw is located in the eastern portion of the Town of Haverstraw but does not front on the Hudson River, and is located directly adjacent to the Town of Stony Point to the north and Haverstraw Village to the south. The Village was estimated to have a population of 10,144 in 2011, a decrease of 1.5% from 2000.⁵³ There are six (6) zoning districts in the Village of West Haverstraw, five of which currently allow residential use. None of the zoning districts permits multifamily development, either as of right or via special permit.⁵⁴ A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Village does not have an affordable housing ordinance. However, there are currently 208 subsidized housing units in the Village of West Haverstraw.

Town of Orangetown

The Town of Orangetown is situated in the southeast corner of the County adjacent to the Hudson River to the east and Bergen County to the south/southwest. The Town's population for 2011 was estimated at 17,689, an increase of 2.7 percent from 2000.⁵⁵ The Villages of Nyack, South Nyack, Grand View and several unincorporated hamlets are located within the Town. More than one-fifth of the Town's total land area is devoted to parks or open space, and the Town's largest single land use is single family residential.

Although A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that Orangetown does not have an ordinance specifically addressing affordable housing, the Town has established bulk and use regulations for senior housing in five (5) zoning districts (see below), which apply only to Town-owned land. The Town administers an affordable housing program that is authorized

⁵¹ 2007-2011 American Community Survey, U.S. Census Bureau.

⁵² Village of Pomona Village Code, Chapter 130: Zoning, retrieved from eCode 360 on May 22, 2015.

⁵³ 2007-2011 American Community Survey, U.S. Census Bureau.

⁵⁴ Village of West Haverstraw Village Code: Chapter 250, Zoning, Planning and Building, retrieved from eCode 360 on May 22, 2015.

⁵⁵ 2007-2011 American Community Survey, U.S. Census Bureau.

to purchase, rehabilitate and convey housing for the needs of low and moderate income families and individuals. The Town is responsible for maintaining the waiting list for senior housing, and prioritizing the waiting list based on factors that reflect the need of applicants (i.e. age, disability, income, resident status). There are currently 198 subsidized housing units in the Town of Orangetown, all of which are located in Sparkill, an unincorporated hamlet.

There are 14 zoning districts, 10 of which permit residential use.⁵⁶ The Town allows for two types of multifamily use, both of which require a special permit. The development of affordable senior housing is permitted only on Town-owned land in five (5) zoning districts, while mixed use development and mixed use expansion are specifically provided for in one zoning district. An additional zoning district (LI) permits all types of residential development except for one and two family residential use.

Village of Nyack

The Village of Nyack is approximately 1.6 square miles in size and is characterized by its waterfront area on the Hudson River, Metro North rail station, proximity to the Tappan Zee Bridge and a quaint downtown area. The Village's 2011 population was estimated at 6,972, an increase of 3.5 percent from 2000.⁵⁷

The Village of Nyack requires that all new multifamily housing developments (for sale or rent) include a 10 percent set aside to serve people with incomes equal to or less than 80 percent of the area median income. In lieu of providing on-site affordable/workforce housing, developers can opt to contribute a nonrefundable payment to the Village of Nyack's Affordable Housing Buyout Fund for no less than \$40,000 per unit of affordable/workforce housing required to be constructed. The Board may also opt to provide incentives in the form of an increased zoning density of up to 10 percent of the housing units permitted under as of right use. There are currently 405 public or subsidized housing units in the Village of Nyack.

There are 13 zoning districts in the Village of Nyack, 10 of which permit residential use. Six (6) of these districts permit as of right multifamily use, and one requires a special permit.⁵⁸ The permitted dimensions for multifamily residential use range from 2 stories (32 feet) and a minimum lot size of 7,500 square feet to 8 stories (85 feet) and a minimum lot size of 40,000 square feet.

Village of South Nyack

The Village of South Nyack is located primarily in the Town of Orangetown, though a portion of the Village lies in the Town of Clarkstown. The Village, which is located adjacent to the

⁵⁶ Town of Orangetown Town Code, Chapter 43: Zoning, retrieved from eCode 360 on May 22, 2015.

⁵⁷ 2007-2011 American Community Survey, U.S. Census Bureau.

⁵⁸ Village of Nyack Town Code, Chapter 360: Zoning, retrieved from eCode 360 on May 22, 2015.

Hudson River to the east, the Village of Grand View to the south and the Village of Nyack to the north, had an estimated population of 3,518 in 2011, a slight increase from 2000.⁵⁹ The Village does not have an ordinance specifically addressing affordable housing. There are currently no public or subsidized housing units in the Village of South Nyack. Residential uses are permitted in twelve of the Village's 13 zoning districts, and only one zoning district permits multifamily residential use.⁶⁰ However, this district applies to four (4) existing six story buildings and stipulates that any changes to existing area and bulk utilization requires a variance. There are no zoning districts that permit the creation of new multifamily units, either via the conversion of existing structures or with new construction.

The Village of Grand View-on-Hudson

The Village of Grand View-on-Hudson is located in the Town of Orangetown adjacent to the Hudson River to the east, the Village of Piermont to the South, unincorporated portions of Orangetown to the west and the Village of South Nyack to the north. The Village had an estimated population of 142 in 2011, an increase of 10 people (6.7%) from 2000.⁶¹ Efforts to obtain the municipal zoning code for the Village were unsuccessful following several requests. Based on information from the *2011 Rockland County Comprehensive Plan*, the majority of the Village's land area is occupied by single family residential uses and is zoned for low-medium density single family use. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website indicates that the Village currently does not have affordable housing regulations or provisions to incentivize the creation of affordable housing. There are no public or subsidized units in the Village of Grand View-on-Hudson.

Village of Piermont

The Village of Piermont is situated on the eastern portion of Orangetown, adjacent to the Hudson River on the east and the Village of Grand View to the north. The Village contains a significant amount of open space, recreational and park land. The Village's 2011 population is estimated at 2,521, a decrease of 3.3 percent from 2000.⁶²

A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Village currently does not have affordable housing regulations or provisions to incentivize the creation of affordable housing. There are currently no public or subsidized housing units in the Village of Piermont. The Village zoning ordinance regulates the use and dimensions of 11 zoning districts, 10 of which allow residential use either as of right or via special permit.⁶³ All but two (2) of these 10 districts permit only single family residential use. Multifamily use in the Village of Piermont is allowed

⁵⁹ *2007-2011 American Community Survey*, U.S. Census Bureau.

⁶⁰ Village of South Nyack Zoning Code, retrieved from <http://southnyack.ny.gov/doc-type/village-code/> on May 27, 2015.

⁶¹ *2007-2011 American Community Survey*, U.S. Census Bureau.

⁶² *Ibid.*

⁶³ Village of Piermont Village Code, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

by special permit only in one zoning district and is limited to a height of 3 stories (35 feet) and a floor area ratio of 30 percent on a minimum lot of 3,000 square feet per dwelling unit.

Town of Ramapo

The Town of Ramapo is the largest and most populated town in Rockland County, and borders the Towns of Clarkstown and Orangetown to the east, the Passaic and Bergen Counties of New Jersey to the south, Orange County of New York to the west and Haverstraw to the north. The Town's 2011 population was estimated at 34,668, a 14.4 percent increase from 2000.⁶⁴ Population estimates for 2014 indicate that the population for the Town increased 5 percent from 2010, the third fastest growth rate in New York State. Twelve (12) of the County's 19 incorporated Villages are located in Ramapo, two of which are located partially in other towns.⁶⁵ Almost a third of the Town's total land area is devoted to parks or open space, particularly in the western portion of the Town. Thus, land uses to the west are largely rural with a significant amount of vacant land and open space while the majority of the Town's housing is located in the eastern half, which includes several clusters of multifamily residential uses.

The Town of Ramapo adopted legislation in 1991 granting partial tax exemption for the conversion of existing structures or new construction of cooperatives, condominiums or rentals constructed or converted to affordable housing after the effective date of the law. The partial tax exemption applies to each affordable unit for a maximum period of 10 years. In year one, the tax exemption is 50 percent and decreases by 5 percent each year until it is 5 percent in year 10. As there are 12 separate villages located within the Town, much of the land area within Ramapo is not under the unincorporated Town's control and is subject to the jurisdiction of villages with differing objectives and approaches to land use planning. While there are currently no affordable housing units located within the unincorporated areas of Ramapo, almost half of the County's 3,063 public or subsidized housing units are located within four incorporated villages in the Town: Airmont (121 units), New Square (30 units), Spring Valley (772 units) and Suffern (565 units).

The Town of Ramapo has 20 zoning districts with a range of permitted uses and dimensions, including mixed use, business, senior housing, multifamily and single family development.⁶⁶ Fifteen of the Town's zoning districts allow for residential use, two (2) of which permit mixed use multifamily development, two (2) of which permit residential multifamily development, one (1) permits three family residences (conversion or new) and one allows for active senior citizen multifamily development. The multifamily zoning district for active senior citizen multifamily development allows for several types of development including townhouses, semiattached and detached structures.

⁶⁴ 2007-2011 American Community Survey, U.S. Census Bureau.

⁶⁵ 2010-2014 American Community Survey, U.S. Census Bureau.

⁶⁶ Town of Ramapo Town Code, Chapter 76: Zoning, retrieved from eCode 360 on May 26, 2015.

Village of Chestnut Ridge

The Village of Chestnut Ridge is situated in the southeast corner of the Town of Ramapo, bordering the Towns of Clarkstown and Orangetown to the east, Bergen County to the south, the Village of Airmont to the west and the Village of Spring Valley to the north. The Village's 2011 population is estimated at 7,906, a 1 percent increase from 2000.⁶⁷ The Village does not currently have affordable housing regulations or provisions to incentivize the creation of affordable housing units. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that there are currently no public or affordable housing units located within the Village. There are 11 zoning districts in the Village of Chestnut Ridge, six (6) of which permit residential uses.⁶⁸ Only one zoning district currently allows for multifamily development, which is restricted to multifamily senior housing that requires a special permit. The zoning district is located in the center of the Village and covers only two parcels, representing a very small portion of the Village's land area.

Village of Airmont

The Village of Airmont is located at the southern border of Ramapo, adjacent to the Village of Chestnut Ridge to the east, Bergen County, New Jersey to the south, the Village of Suffern to the west and the Village of Montebello to the northwest. In 2011, the population of the Village of Airmont was 8,533, an increase of almost 10 percent from 2000.⁶⁹ A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Village does not currently have affordable housing regulations or provisions to provide incentives for the development of affordable housing units. However, there are currently 121 public housing units located in the Village. There are 11 zoning districts in the Village of Airmont, six (6) of which permit residential use. Of the six (6) residential zoning districts in the Village, five permit only single family residential use.⁷⁰ Only one zoning district currently allows multifamily residential use, which is restricted to multifamily senior housing or housing for the physically handicapped. It is not clear whether the development of a multifamily structure for seniors or the physically handicapped is as of right or requires a special permit.

Village of Suffern

The Village of Suffern is located in the Town of Ramapo adjacent to the the Village of Airmont to the east, Bergen County, New Jersey to the South, the Village of Hillburn to the

⁶⁷ 2007-2011 American Community Survey, U.S. Census Bureau.

⁶⁸ Village of Chestnut Ridge Village Law, retrieved from

<http://www.chestnutridgevillage.org/Zoning%20Law/Zoning%20Law.htm> on May 26, 2015.

⁶⁹ 2007-2011 American Community Survey, U.S. Census Bureau.

⁷⁰ Village of Airmont, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

west and the Village of Montebello to the north. The Village had an estimated population of 10,726 in 2011, a decrease of 2.5 percent from 2000.⁷¹ Efforts to obtain the municipal zoning code for the Village were unsuccessful following several requests. Based on information from the *2011 Rockland County Comprehensive Plan*, the Village's land area is occupied by a mixture of zoning districts, including low-medium density multifamily, medium density 1-2 family, medium to high density multifamily, high density 1-2 family, office and general business/community commercial uses. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website indicates that the Village currently does not have affordable housing regulations or provisions to incentivize the creation of affordable housing, and there are currently 565 public or subsidized units located within the Village of Suffern.

Village of Hillburn

The Village of Hillburn is located in the southwest area of Rockland County, adjacent to Suffern to the east, Passaic County, New Jersey to the south and Harriman Park to the north and west. In 2011, the population of the Village of Hillburn was 962, an increase of 9.4 percent from 2000.⁷² There are currently no public or subsidized housing units located in Hillburn, and the Village does not currently have affordable housing regulations or provisions to provide incentives for the development of affordable housing units. There are six (6) zoning districts in the Village of Hillburn, four (4) of which permit residential use.⁷³ There are currently no zoning districts in the Village of Hillburn that permit multifamily residential use, either as of right or via a special permit.

Village of Sloatsburg

The Village of Sloatsburg is located in the southwest area of Rockland County, adjacent to Orange County, New York to the west, Passaic County, New Jersey to the south and Harriman Park to the north. In 2011, the population was estimated at 3,047, a slight increase from 2000; however, the Village experienced a decrease in the number of households during this period of time.⁷⁴ The Village has 12 zoning districts, 9 of which permit residential use. Two zoning districts currently permit multifamily uses by special permit, and allow development with up to 4 dwelling units with a minimum size of 900 square feet.⁷⁵ One zoning district permits mixed residential and non-residential uses by special permit. The VC-2 zoning district permits as of right multifamily residential uses for active adults ages 55 and above with up to 30 owner occupied dwelling units as part of a condominium development. The regulations for this development specify that 20 percent of the units be made affordable

⁷¹ 2007-2011 American Community Survey, U.S. Census Bureau.

⁷² 2007-2011 American Community Survey, U.S. Census Bureau.

⁷³ Village Code, Chapter 250: Zoning, retrieved from the Village of Hillburn on June 3, 2015.

⁷⁴ 2007-2011 American Community Survey, U.S. Census Bureau.

⁷⁵ Village of Sloatsburg, Chapter 54: Zoning, retrieved from <http://www.sloatsburgny.com/CompZoningRevZ1.6.pdf> on May 29, 2015.

to senior citizens and state that, to the extent permissible under Federal fair housing requirements, the initial sale of the units should be first marketed to individuals associated with the Village and Town of Ramapo in a number of ways, including community service volunteers serving the Town or Village, parents and siblings of community service residents, former Sloatsburg residents and officers or employees of the police agencies serving the Village. The Village does not currently have affordable housing regulations or provisions for incentives for the development of affordable housing beyond the 20 percent set aside for a senior citizen development in the VC-2 zoning district. There are currently no public or subsidized housing units located within the Village of Sloatsburg. In a letter to the County of Rockland Office of Community Development dated June 3, 2015, the Village stated that it is a semi-rural area with a small population and a number of natural amenities but would welcome senior citizen housing and affordable rental units to meet the needs of the Village.⁷⁶

Village of Montebello

The Village of Montebello is positioned in the middle of the Town of Ramapo between the Village of Wesley Hills to the north, the Village of Airmont to the south and the Villages of Suffern and Airmont to the south. The estimated 2011 population for the Village is 4,438, a 20.3 percent increase.⁷⁷ While a search for the keywords “affordable” and “multifamily” and “multiple” on the Village’s website and zoning code indicates that the Village does not currently have affordable housing regulations or provisions for incentives for the development of affordable housing, it established an affordable housing development zone that specifies where affordable housing should be constructed. There are currently no public or subsidized housing units located within the Village of Montebello. There are 17 zoning districts specified in the Village’s zoning ordinance, three (3) of which are overlay districts that do not dictate bulk and uses of a development.⁷⁸ Of the remaining 14 zoning districts, eight permit residential use, three of which allow for multifamily development by special permit. The Route 59 Development (R59-DD) zone allows for potential development based on previous zoning designations and consultation with the Planning Board and Village Board and can result in development of multifamily affordable housing according to the Village’s Affordable Housing Development (R-AH) zoning district. This district allows for dense development of smaller lots by special permit, with a minimum lot area of 1,125 square feet that corresponds with a 25 foot height limit as well as a maximum coverage of 80 percent and floor area ratio of 1.8. The R-AH zoning district is located near the southern border of the Village and is affordable to moderate income persons who earn up to 80 percent of the area median income. In comparison, the Residential Senior Citizen (RSH) zoning district permits lower density development than the R-AH zoning district, with a building height of 20

⁷⁶ Village of Sloatsburg, Letter to S.Nagubandi, Director of the County of Rockland County Office of Community Development, June 3, 2015.

⁷⁷ 2007-2011 American Community Survey, U.S. Census Bureau.

⁷⁸ Village of Montebello Village Code, Chapter 195: Zoning, retrieved from eCode 360 on May 26, 2015.

feet, maximum coverage of 40 percent, minimum lot area of 4 acres and floor area ratio of 0.3.

Village of Wesley Hills

The Village of Wesley Hills is located in central Ramapo, adjacent to the Village of Pomona to the north, the Village of New Hempstead to the east and the Village of Montebello to the south. The estimated 2011 population for the Village is 5,541, a 14.3 percent increase from 2000.⁷⁹ The Village zoning ordinance specifies six (6) zoning districts, all of which permit residential use.⁸⁰ None of the Village's zoning districts permit multifamily residential use. The Village of Wesley Hills, with the exception of a small commercial area on Route 306, consists of single family homes. In a letter to the County of Rockland Office of Community Development dated May 29, 2015, the Town stated that "there is no provision for multiple housing and the Village is nearly completely built out, so building any affordable housing, or any new housing at all is a difficult prospect." A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Village does not currently have affordable housing regulations or provisions to provide incentives for the development of affordable housing. There are currently no public or subsidized housing units located within the Village of Wesley Hills.

Village of Kaser

The Village of Kaser is a geographically small village that is located in central Ramapo, adjacent to the Village of Spring Valley to the northeast and is otherwise surrounded by unincorporated Town of Ramapo land. In 2011, the Village population was estimated at 4,566, an increase of 37.7 percent from 2000.⁸¹ The Village has three zoning districts, all of which permit residential use.⁸² While one zone is restricted to single family residential use, the R-2 district permits three, four and five family semi attached and detached residential uses as of right on lots at least 10,000 square feet and the PD district permits the as of right uses from the R-2 district as well as multiple dwellings (defined as 6 or more units) by special permit on lots at least 40,000 square feet. For both the R-2 and PD district, all residential uses with at least three dwelling units have a maximum building height of 35 feet and a maximum lot coverage of 55 percent. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Village of Kaser does not currently have affordable housing regulations or provisions to provide incentives for the development of affordable housing. There are currently no public or subsidized housing units located within the Village of Kaser.

⁷⁹ 2007-2011 American Community Survey, U.S. Census Bureau.

⁸⁰ Village of Wesley Hills Village Code, Chapter 230: Zoning, retrieved from eCode 360 on May 26, 2015.

⁸¹ 2007-2011 American Community Survey, U.S. Census Bureau.

⁸² Zoning Local Law for the Village of Kaser, retrieved from the Village of Kaser on May 28, 2015.

Village of Spring Valley

The Village of Spring Valley is located on the eastern border of the Town of Ramapo, with a small portion located in the Town of Clarkstown to the east. The estimated 2011 population for the Village is 30,802, an increase of 21 percent from 2000.⁸³ The Village of Spring Valley has an affordable housing ordinance, which requires that all new development, which is otherwise not subsidized with at least 10 housing units set aside at least 10 percent of the dwelling units for families earning between 60 and 120 percent of the area median income. There are 772 units of public or subsidized housing units in the Village of Spring Valley, making Spring Valley the village with the largest concentration of affordable housing units in the County. Alternatively, a developer can opt to make an affordable housing contribution with a majority vote of the Village Board, although the Board strongly encourages the construction of affordable housing. There are 15 zoning districts specified in the Village's zoning ordinance.⁸⁴ Eight zoning districts permit as of right residential use, two of which permit as of right multifamily use and two of which permit multifamily use by special permit. The zoning code permits residential use a minimum lot area ranging from 20,000 square feet to 40,000 square feet, a building height ranging from 40 feet (3 stories) to 80 feet (8 stories) and a floor area ratio ranging from 0.6 to 1.0. An additional four zoning districts have been designated for mixed use by special permit.

Village of New Hempstead

The Village of New Hempstead is located in the Town of Ramapo adjacent to the Village of Airmont to the east, Bergen County, New Jersey to the south, the Village of Hillburn to the west and the Village of Montebello to the north. The estimated 2011 population for the village is 5,092, an increase of 6.8 percent from 2000.⁸⁵ Based on information from the *2011 Rockland County Comprehensive Plan*, the Village's land area is occupied almost entirely by low density single family and low-medium density single family zoning districts. There are six (6) zoning districts in the Village, five (5) of which permit residential use.⁸⁶ None of the zoning districts permits multifamily use, either as of right or via a special permit. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website indicates that the Village currently does not have affordable housing regulations or provisions to incentivize the creation of affordable housing, and there are currently no public or subsidized units located within the Village of New Hempstead

⁸³ *2007-2011 American Community Survey*, U.S. Census Bureau.

⁸⁴ Village of Spring Valley Village Code, Chapter 255: Zoning, Appendix A: Table of General Use Requirements and Appendix B: Table of General Bulk Requirements, retrieved from eCode 360 on May 28, 2015.

⁸⁵ *2007-2011 American Community Survey*, U.S. Census Bureau.

⁸⁶ Village of New Hempstead Local Law #11: A Local Law Regulating and Restricting the Location, Construction and Use of Buildings and Structures and the Use of Land in the Village of New Hempstead, County of Rockland, State of New York, retrieved from the Village of New Hempstead on June 3, 2015.

Village of New Square

The Village of New Square is located in the Town of Ramapo adjacent to the Town of Clarkstown to the east, unincorporated portions of Ramapo to the south and north and the Village of New Hempstead to the south. The Village is currently the fastest growing municipality in Rockland County, as it had an estimated population of 6,668 in 2011, an increase of 44.2 percent from 2000.⁸⁷ Based on information from the *2011 Rockland County Comprehensive Plan*, the majority of the Village's land area is occupied by medium density 1-2 family and medium-high density multifamily zoning districts, with some land area designated for high density 1-2 family and general business/community commercial zoning districts. There are four zoning districts in the Village, three of which permit residential use. Two zoning districts permit as of right multifamily use with a minimum lot size of 8,000 square feet.⁸⁸ An internet search for the keywords "affordable" and "multifamily" and "multiple" associated with the Village's zoning ordinance and code indicates that the Village currently does not have affordable housing regulations or provisions to incentivize the creation of affordable housing. There are currently 30 public or subsidized units located within the Village of New Square.

Town of Stony Point

The Town of Stony Point is located in the northernmost portion of Rockland County adjacent to Orange County on the western border and the Hudson River on the eastern border. With two-thirds of the Town's land area devoted to parks and open spaces,⁸⁹ the Town of Stony Point is the most rural of the five Towns in Rockland County. In 2011, the Town was estimated to have a population of 14,949, an increase of almost 5 percent from 2000. Single family homes represent the majority of the Town's developed land area, with limited commercial development and a small amount of medium density or multifamily housing. A search for the keywords "affordable" and "multifamily" and "multiple" on the Village's website and zoning code indicates that the Town did not have any affordable housing regulations. The Town of Stony Point currently contains 75 subsidized housing units for seniors at the Sopko Apartments.

The Town of Stony Point currently has 13 zoning districts, 8 of which allow residential use and 5 of which do not allow residential uses. Currently, only one of the 8 residential zones allows for multifamily development with a special permit. This zone is limited to development for seniors ages 55 and above. The Town recently developed a Long Form Environmental Assessment regarding amending the PW zone to, among other adjustments, allow mixed-use multifamily development.

⁸⁷ 2007-2011 American Community Survey, U.S. Census Bureau.

⁸⁸ Village of New Square Local Law No. 1: A Local Law Regulating and Restricting the Construction and Use of Buildings and the Use of Land in the Village of New Square, retrieved from the Village of New Square in 2006.

⁸⁹ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, adopted March 1, 2011.

c. Synopsis

In sum, the zoning ordinance analysis of 22 of the 24 jurisdictions in Rockland County identified 231 unique zoning districts that regulate permitted uses and bulk regulations in Rockland County. As noted above, efforts to obtain the municipal zoning code for the Villages of Grand View and Suffern were unsuccessful following several requests. Several overlay districts that do not regulate use and bulk were not included in this synopsis and Table 6.1, below. The number of zoning districts within an individual jurisdiction ranged from one (1) district to 20 districts. Of the 231 zoning districts assessed, 168 permit residential use. Of the 22 zoning ordinances assessed, seven (7) do not incorporate zoning districts that permit the development of new multifamily uses of 3 or more units. Ten (10) municipalities contain zoning districts that permit multifamily uses either as of right or via special permit.

The creation of affordable housing units for low and moderate income households and protected classes has been made a priority by Rockland County, and was raised as a potential impediment in the *2010-2014 Analysis of Impediments to Fair Housing Choice* and the County's *2011 Comprehensive Plan*. Although a number of issues contribute to difficulties in creating affordable housing, including high property values and limited quantities of land available for construction, the development of local zoning laws that facilitate the development of affordable housing is recognized in the Rockland County 2011 Comprehensive Plan as a critical step toward creating more affordable housing units.

Given the fragmented nature of Rockland County's regulatory and planning environment, a broad range of jurisdictions maintain policies and ordinances that have the potential to raise fair housing concerns. In particular, local zoning ordinances can impact the production of multifamily housing, accessory dwelling units, emergency shelters, transitional housing and community care facilities, all of which serve lower income households and special needs populations. As demonstrated in this analysis, many jurisdictions in the County do not currently have land use policies and zoning in place which would permit the development of a full range of choices to meet the County's diverse housing needs and facilitate fair housing choice for all segments of the population.

This zoning analysis should serve as an initial step toward assessing the impediments to fair housing choice posed by local zoning ordinances. Going forward, the County should conduct an extensive zoning analysis, assessing jurisdictions' definitions of family, the feasibility of building affordable multifamily development (dimensions and uses) and whether any zoning codes do not comply with Federal, State and/or local fair housing regulations. The County should also assess subdivision regulations and other types of land use policies that may not be located within a jurisdiction's zoning ordinance. The County should also work with local jurisdictions to establish a model ordinance encouraging the development of

affordable housing that is appropriate for a range of jurisdictions⁹⁰ and establish a model affordable housing ordinance outlining specific requirements and incentives for the creation of affordable housing.

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⁹⁰ In 2010, Westchester County developed and approved Model Ordinance Provisions and then distributed them to local jurisdictions to adopt and conducted training and information sessions. As of March 31, 2013, 12 municipalities had adopted some or all components of the model ordinance.

Table 6.1 - Summary of Municipal Zoning Analysis

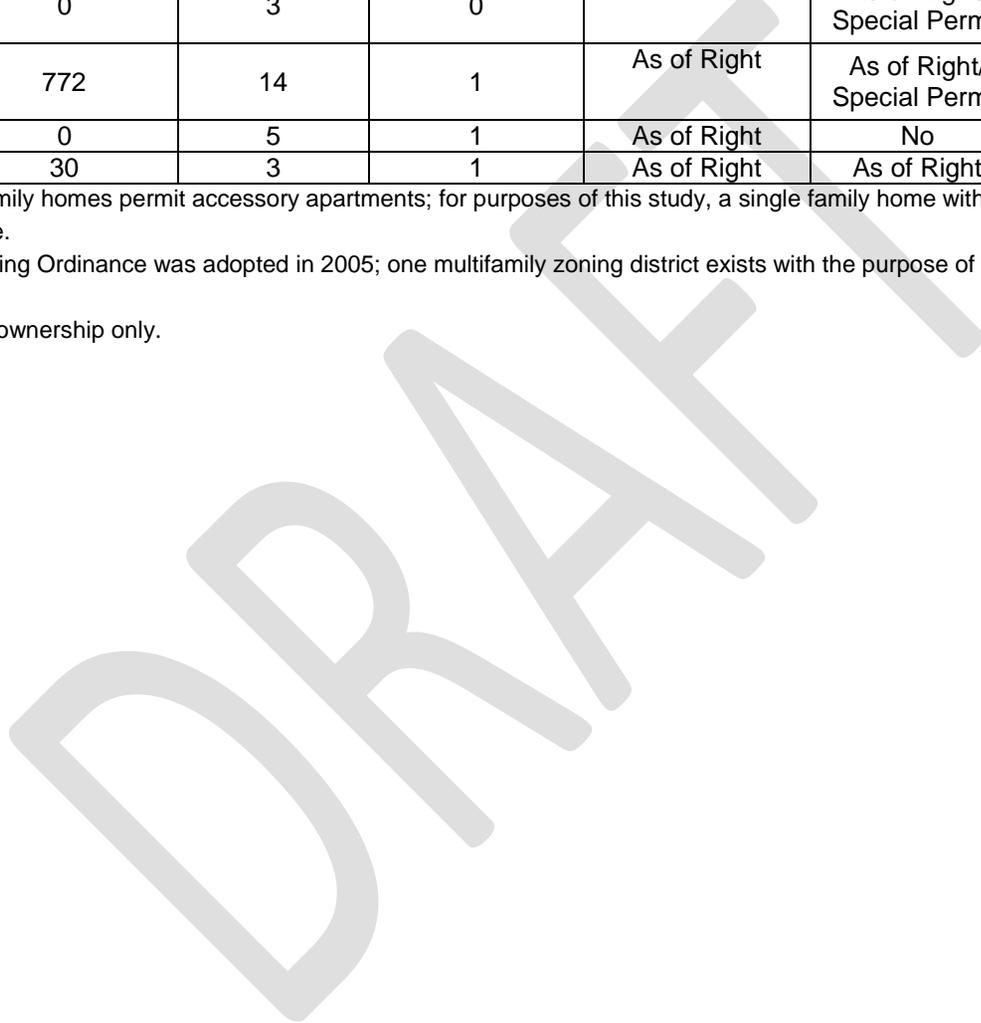
Municipality	Number of Affordable Housing Units	Number of Districts		Two Family	Multifamily (3 or More DU)		
		Allowing Residential Use	Not Allowing Residential Use		Permitted	Permits Senior Housing	Permits Family Housing
TOWNS (Unincorporated Portions)							
Clarkstown	407	11	9	As of Right	As of Right/ Special Permit	Yes	Yes
Haverstraw	0	7	4	As of Right	As of Right/ Special Permit	Not Specified	Yes
Orangetown	198	10	4	As of Right/ Special Permit	As of Right/ Special Permit	Yes	Yes
Ramapo	0	15	5	As of Right/ Special Permit	As of Right/ Special Permit	Yes	Yes
Stony Point	75	8	5	As of Right/ Special Permit	As of Right/ Special Permit	Yes	No
VILLAGES							
Upper Nyack	0	6	3	No	No	N/A	N/A
Haverstraw	210	9	3	As of Right	Special Permit	Yes	Yes***
Pomona	0	1	0	No	No	N/A	N/A
West Haverstraw	280	5	1	No	No	N/A	N/A
Nyack	405	10	3	As of Right	As of Right/ Special Permit	Not Specified	Yes
South Nyack	0	12	1	As of Right	No**	No**	No**
Grand View	0	Not Provided	Not Provided	Not Provided	Not Provided	Not Provided	Not Provided
Piermont	0	10	1	Special Permit	Special Permit	Not Specified	Yes
Chestnut Ridge	0	6	5	No	Special Permit	Not Specified	Yes
Airmont	121	6	5	No	Special Permit	Yes	No
Suffern	565	Not Provided	Not Provided	Not Provided	Not Provided	Not Provided	Not Provided
Hillburn	0	4	2	Special Permit	No	N/A	---
Sloatsburg	0	9	3	As of Right	As of Right/ Special Permit	Yes	Yes

Montebello	0	8	6	Special Permit	Special Permit	Yes	Yes
Wesley Hills	0	6	0	No	No	N/A	N/A
Kaser	0	3	0	As of Right	As of Right/ Special Permit	Not Specified	Yes
Spring Valley	772	14	1	As of Right	As of Right/ Special Permit	Not Specified	Yes
New Hempstead	0	5	1	As of Right	No	Not Specified	Yes
New Square	30	3	1	As of Right	As of Right	Not Specified	Yes

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

**The Village of South Nyack Zoning Ordinance was adopted in 2005; one multifamily zoning district exists with the purpose of restricting further expansions on existing multifamily structures.

***Condominiums or cooperative ownership only.



D. COST OF LIVING

The cost of living in Rockland County is high. The County's proximity to New York City, suburban character, green space and high performing public schools make it a highly attractive and expensive place to live. According to the U.S. Bureau of Labor Statistics, the 2010 Consumer Price Index (CPI) for the New York-Northern New Jersey-Long Island, NY-NJ-PA metro area is 259.64, significantly higher than the U.S. urban average CPI of 236.11. The CPI provides annual regional cost analyses of housing, food, fuels and utilities, transportation, medical care and education (See Table 6.2).

Table. 6.2 - Consumer Price Index Regional Cost of Living

Region	March 2015 CPI
U.S. Urban Average	236.11
Northeast Region (ME, MA, NH, NJ, NY, PA, RI, VT)	251.45
New York Metro	259.64

Source: Consumer Price Index, New York-Northern New Jersey-Long Island, March 2015, U.S. Bureau of Labor Statistics.

Compared with the Northeast Region, the New York metro area experiences significantly higher costs in both the shelter and fuels and utilities components of housing as well as private transportation costs.

i. Property Tax

Property tax burden can adversely affect housing costs for people of all incomes but makes homeownership particularly challenging for extremely low to moderate income households. High tax rates can be burdensome to low-income homeowners and can result in high rents. On March 3, 2015, RealtyTrac, an online real estate database and newsroom, published its *U.S. Property Tax Rates Report for 2014*. RealtyTrac reports that in 2014 New York State had the highest average property taxes in dollars for single family homes (\$15,625) in the country, which is nearly twice as much as the runner up. Four of the top five (5) counties with the highest average 2014 property taxes in dollars for single family homes are located in the New York metro area, indicating that high property taxes are prevalent in the region. As depicted in Table 6.3, Rockland County is ranked number 4 in the New York metro area in terms of property taxes paid and tax as a percentage of household income. The median real estate tax paid by Rockland County residents is \$9,130 (single family homes, condos and co-ops) in which property taxes constitutes 10.6 percent of the median household income. As taxes vary significantly among towns and villages, residents of Rockland County experience different levels of property tax burden based on their location.

Table 6.3 - Property Taxes by County in the New York MSA

County	Median Real Estate Taxes Paid	Median Household Income for Homeowners	Tax as % of Income
Westchester County, New York	\$10,000+	\$81,093	12.3%+
Nassau County, New York	\$9,402	\$97,049	9.7%
Bergen County, New Jersey	\$9,144	\$84,255	10.9%
Rockland County, New York	\$9,130	\$86,020	10.6%
Essex County, New Jersey	\$8,820	\$55,027	16.0%
Hunterdon County, New Jersey	\$8,820	\$105,880	8.3%

Source: 2008-2012 American Community Survey (B19013 and B25103).

The New York State Office of Real Property Services assigns each county and each municipality an annual equalization rate, which is defined as real property taxes per \$1,000 of assessed valuation. Rockland County's State equalization rate for 2014 was \$36.71, while the equalization rate for villages ranged from \$7.01 for the Village of Haverstraw to \$107.50 for the Village of West Haverstraw and a portion of the Village of Pomona.⁹¹ On the town level, State equalization rates ranged from \$15.82 for the Town of Stony Point to \$107.50 for the Town of Haverstraw.

In 2014, the towns of Rockland had a County tax rate ranging from \$3.05 per \$1,000 for the Town of Haverstraw to \$20.34 per \$1,000 for the Town of Ramapo.⁹² People who live in specific areas are also subject to town, village, school, sewer and/or other taxes. With the exception of the Villages of Upper Nyack, Spring Valley, Haverstraw, Piermont and Hillburn, most of the County's villages are non-assessing villages that use the equalization rate of the town in which they are located. However, only a portion of a home's market value is counted as assessed value. As Rockland County is the fourth most expensive County in the New York MSA, which is ranked as a region with one of the highest property taxes in the United States, property taxes can directly impact the affordability of a property, along with property prices, interest rates, and homeowner's insurance and other related costs.

The State of New York currently offers residents property tax relief in the form of School Tax Relief (STAR) exemptions, which apply only to school tax bills. There are two types of STAR exemptions: 1) a Basic STAR program that is available to primary residents of owner-occupied homes where the resident owners' and spouse's total income is less than \$500,000; 2) an Enhanced STAR that provides an increased benefit for senior citizen residents with qualifying incomes who are the owners and primary occupants of their home

⁹¹ New York State Office of Real Property Tax Services, Rockland County 2014 Equalization Rates.

⁹² Rockland County Tax Division, 2015.

and exempts the first \$64,300 of the full value of a home from school taxes as of 2015-2016 school tax bills. The savings resulting from either the Basic or Enhanced STAR exemptions are limited to a 2 percent increase from the previous year⁹³.

E. AFFORDABLE HOUSING

The five municipal housing authorities located in Rockland County own and operate 8 public/low-income housing complexes, consisting of 510 units, within their own jurisdictions. Some of these properties are project-based Section 8 properties. Housing Choice Voucher Programs are administered by Rockland County and the five municipal housing authorities. More than 2,500 privately owned/managed low-income housing units also exist within Rockland.

i. Section 8 Vouchers

a. Purpose and Availability

The purpose of public or assisted housing, which was created by the Congress of the United States in 1937, is to provide decent, safe, sanitary and affordable housing to families unable to pay market rate rents. The Section 8 Housing Choice Voucher Program is a Federal program for assisting very-low income people, including families, individuals, elderly and disabled individuals, in renting safe, sanitary and affordable housing in the community. Participants in the Housing Choice Voucher Program are allowed to locate and lease privately owned single-family homes, apartments and manufactured homes that meet Housing Quality Standards (HSQ) set by HUD regulations and Section 8 Housing Choice Voucher Program policies if the owner agrees to participate. Tenants receiving Housing Choice Vouchers normally pay no more than 30 percent of their monthly income for rent otherwise known as rent controlled programs. Eligibility requirements are based on income, household size and other guidelines outlined by HUD.

Within Rockland County, Housing Choice Vouchers are administered by the Rockland County Office of Community Development, which serves as the Local Administrator for New York State Homes and Community Renewal (HCR) Section 8 Housing Choice Vouchers for Rockland County. Additionally there are five local Public Housing Authorities (PHAs) which administer Housing Choice and/or Project Based Section 8 programs as well as public housing. Eligible tenants receive vouchers to locate affordable housing within the community. There are currently 316 households on the County's waiting list for Section 8 vouchers. When the County last opened its waiting list in 2007, 1,350 applications were received. Many of the Housing Choice Voucher Programs have extensive waiting lists for a unit.

The Kaser Public Housing Authority (KPHA), which services the Village of Kaser, currently administers 89 tenant based vouchers and 38 portability vouchers, for a total of 127 Section 8 Vouchers. Nine vouchers are for seniors (5 for the Village plus 4 portable vouchers). The Village

⁹³ New York State Department of Taxation and Finance Website, 2015.

of Nyack Housing Authority (NHA) currently administers 188 Section 8 vouchers, 28 project based and 160 tenant based. Additionally, 67 of the vouchers currently in use are for elderly households and 110 are for disabled families. The Village of New Square Housing Authority (VNSPHA) administers 696 Section 8 vouchers, 45 of which are project based and 651 of which are tenant based. Eightteen (18) vouchers are dedicated to seniors (2 project based and 16 tenant based). The Village of Spring Valley administers its own Housing Choice Vouchers (Section 8), separately from the Spring Valley Housing Authority which administers the Village's public housing. The Village of Spring Valley has 815 tenant based vouchers with 560 of the vouchers leased as of April 2015. The Village has 168 households on its Section 8 waiting list, with an estimated wait time of at least 3 years.

ii. Public Housing

There are five municipal housing authorities located in Rockland County that operate 11 public/low income housing complexes with a total of 510 units: the Kaser Housing Authority, the New Square Housing Authority, the Nyack Housing Authority, the Ramapo Housing authority and the Spring Valley Housing Authority.

Table 6.4 - Public Housing in Rockland County

	PHA/ Authority	Funding	Total	Studio	1-BR	2- BR	3+ BR
Waldron Terrace	NHA	NYS 115 A&B	88	0	11 6 – Accessible	31	40
Depew Manor	NHA	NYS 115 A&B	48	24	24	0	0
Pine St. Home Apartments	NHA	LIHTC	28	0	16	10	2
Airmont Apartments (Pondview Dr.)	RHA		121				
Hillcrest Apartments (Catamount Dr.)	RHA		79				
Gesner Gardens	SVHA		75	0	0	39	36
Harvest House	SVHA		51	7	44	0	0
Franklin Court Apartments	SVHA		20	0	0	14	6
		TOTAL	510				

The Nyack Housing Authority also owns and operates two Public Housing facilities, totaling 164 units exclusively for qualifying Nyack residents: Waldron Terrace for families and Depew Manor for senior citizens. Separately and not part of the NHA are privately held facilities that operate under NYS and HUD housing programs which include Rockland Gardens, Nyack Plaza and Tallman Towers.

The Ramapo Housing Authority operates two public housing developments with a total of 200 units. Airmont Apartments (Pondview Drive) consists of 121 units, 90 targeted to senior

citizens and 31 targeted to families. Hillcrest Apartments (Catamount Drive) consists of 79 units, 60 targeted to seniors and 19 to families.

The Spring Valley Housing Authority operates three public housing developments with a total of 146 units. Gesner Gardens has 75 units for families; 39 two-bedroom, 28 three-bedroom and 8 four-bedroom units. Harvest House has 51 units for seniors; 7 studio units and 44 one-bedroom units. Franklin Court Apartments has 20 units for families; 14 two-bedroom and 6 three-bedroom units.

a. Administration

The Housing Choice Voucher Administrative Plan (Admin Plan) is the policy and procedure manual that includes the regulations governing this housing assistance program. Generally, the Admin Plan includes policies that describe the selection and admission of applicants from the waiting list, the issuance and denial of vouchers, occupancy policies, landlord participation, subsidy standards, informal review/hearing procedures, payment standards, the Housing Quality Standards (HQS) inspection process, and reasonable rents, to name a few.

iii. Subsidized Housing

In addition to the Public Housing described above, Rockland County has 2,553 low income subsidized living units in 24 facilities, 21 of which contain units for seniors. These facilities provide subsidized housing through a variety of funding sources including the Section 8 and Section 202 programs and low-income housing tax credits (LIHTC). Nyack Housing Authority, through its corporation, Nyack Housing Assistance Corp. (NYAC), serves as Contract Administrator for two site-based HUD Section 8 programs. Nyack Plaza has 30 studio and 66 one-bedroom units for seniors and 43 two-bedroom and 34 three-bedroom units for families. Rockland Gardens has 35 one-bedroom and 33 two-bedroom units for families. Nyack Plaza is a Section 8 New Construction program, while Rockland Gardens is a Section 8 Substantial Rehabilitation program. The majority (over 80%) of units are one-bedroom, with 273 units having 2 or more bedrooms. The following table (Table 6.5) provides an inventory of subsidized buildings in Rockland County including Section 8 New Construction and Substantial Rehabilitation Programs, LIHTC and other programs.

a. Administration

There is no central process that manages and administers subsidized housing in Rockland County. There are a number of subsidized housing managers in Rockland County, each of which establishes their own procedures to manage and administer their units. Each property manager maintains its own waiting lists and establishes the policies for screening of applicants for tenancy, occupancy standards and policies, and procedural guidelines to conducting inspections. While the County has no control over the policies of these various

subsidized housing managers, they must meet all minimum Federal and State requirements with regard to fair housing practices.

Table 6.5 - Low Income Assisted Housing

	Population	Funding	Total	Studio	1-BR	2-BR	3+ BR
Airmont Gardens	Senior	LIHTC	140	0	110	40	0
Esther Dashew Apts.	Senior	PB Section 8	105	0	105	0	0
Esther Gitlow Towers	Senior	--	115	0	115	0	0
Esther Gitlow Towers II	Senior	Section 202, Section 8	79	0	79	0	0
Haverstraw Place	Senior	LIHTC, HOME	89	2	87	0	0
Hyenga Lake Senior Housing	Senior	LIHTC	65	0	65	0	0
Sopko Apartments (Knights Corner)	Senior	--	75	--	--	--	--
Lakeview Village	Senior & Family	LIHTC	220	16	151	32	21
Middlewood Apts.	Senior	PB Section 8	102	0	102	0	0
Monterey Gardens	Senior	Section 8	106	0	106	0	0
Murphy Manor	Family	LIHTC, HTF Loan	25	0	0	25	0
New Square I, II & III	Family	LIHTC	30	0	0	6	24
Nyack Plaza Apts.	Senior & Family	Section 8 New Const.	173	30	66	43	34
Red Schoolhouse Road	Senior	Section 202, Section 8	100	0	94	6	0
Rockland Gardens	Family	Section 8 Sub Rehab	68	0	35	33	0
Seton Village	Senior	LIHTC	34	0	34	0	0
Spook Rock Sr. Citizen Apts.	Senior	LIHTC	231	0	231	0	0
Squadron Gardens	Senior	PB Section 8	100	0	100	0	0
Sycamore Crest	Senior	LIHTC	96	0	48	48	0
Thorpe Village	Senior	Section 202, Section 8	198	0	197	1	0
Walnut Hill Apts.	Senior	LIHTC	180	0	180	0	0
Warren Knolls Apts.	Senior	PB Section 8	96	0	96	0	0
West Haverstraw Senior Housing	Senior	PB Section 8	100	0	100	0	0
Youngblood Senior Housing	Senior	LIHTC	26	0	26	0	0
		TOTAL	2,553	46	1,566	194	79

iv. Loss of Affordable or Subsidized Units

The County does not anticipate a significant loss of affordable or subsidized units from the overall housing inventory over the next five years. However; the allocation of tenant-based Section 8 vouchers is dependent on funding from HUD and is thus subject to fluctuation which is outside the County's control.

Additionally, the Town of Haverstraw and the Village of Spring Valley have experienced the gradual erosion of rent control/stabilized buildings and units within their communities. For the past two decades, the rent laws have provided for the deregulation of rent controlled/stabilized apartments based on rents and occupant's incomes reaching certain levels. Additionally, many older, and more affordable, multi-family buildings in the County's villages are being torn down and replaced with newer, and more expensive, housing. This loss of affordable housing in what is already a very tight market further exacerbates the County's affordable fair housing issues.

F. AFFIRMATIVE MARKETING PLAN

Rockland County requires that all owners of a rental or ownership project carried out with CDBG, HOME and/or County funds undertake the following actions:

1. Use the "Equal Opportunity" logotype or slogan on all correspondence and advertising prepared relating to the rental of units.
2. Place ads in a local County-wide newspaper of general circulation, e.g. the *Rockland Journal News* and *Rockland County Times*, to advertise housing opportunities.
3. Maintain a nondiscriminatory hiring policy for sales and leasing staff.
4. Depict persons of majority and minority groups and from both genders in all advertising.
5. Prominently display a HUD-approved Fair Housing poster in all offices in which sale or rental activity pertaining to the project or subdivision takes place.
6. Target outreach to ethnic and racial groups that are underrepresented in the housing development based on their representation in the County.
7. Provide all advertising in the language the group is most familiar with and provide a contact person who can answer questions in the language primarily spoken by the target group.
8. Post a sign in a conspicuous position on the project site displaying prominently either the Equal Housing Opportunity logo, slogan or statement.
9. Project Owners should submit the Affirmative Fair Housing Marketing (AFHM) Plan to the Office of Community Development for review 120 days prior to initiating sales or rental market activities, which the County will review and consider approval of within 30 days.

Responsibilities carried out by the County include posting flyers of upcoming housing opportunities and notices on the County website, maintaining and making available to interested parties a listing of the affordable housing stock, and requesting owners of property assisted under CDBG, HOME and/or County funds to maintain specific records and report annually on critical affirmative marketing data. See Appendix C for the County's affirmative marketing policies and procedures, which is located within the Rockland County Office of Community Development Administrative Policy and Procedures for CDBG, HOME, HOPWA and other funding sources.

G. TRANSPORTATION LINKAGES

i. Mode of Transportation

Households without a vehicle are typically represented by low and moderate income households. As such, access to public transit is critical to expanding fair housing choice, particularly between areas with concentrations of minority and low and moderate income households and employment opportunities. According to *2013 American Community Survey* estimates, 8,339 households in Rockland County had no access to a vehicle, comprising 6.0 percent of all households with workers age 16 and above (see Table 6.6).

Table 6.6 - Mode of Transportation to Work by Race/Ethnicity (2013)

	Drove Alone		Carpooled		Public Transit		Walked		Other*	
	#	%	#	%	#	%	#	%	#	%
Total										
139,793	99,458	71.1	14,867	10.6	12,237	8.8	5,147	3.7	7,834	5.6
White										
97,446	72,225	74.1	8,860	9.1	6,751	6.9	3,614	3.7	5,996	6.2
Black										
18,436	12,922	70.1	1,780	9.7	2,403	13.0	499	2.7	832	4.5
Hispanic										
23,729	14,067	59.3	3,820	16.1	3,209	13.5	1,130	4.8	1,503	6.3

Source: 2009-2013 American Community Survey (BO8105A, B and I)

**Other" is comprised of "Other means," "Taxi, motorcycle, bicycle, etc." and "Worked at home" transportation categories.

According to *2009-2013 American Community Survey* estimates, White individuals represent the demographic group with the highest portion (74.1 percent) of people who drive to work alone, compared with 70.1 percent for the White demographic group and 59.3 percent for the Hispanic demographic group. While the Black and White demographic groups demonstrated similar carpool (9.1 and 9.7 percent) use, Hispanic individuals were much more likely to carpool (16.1 percent). The Black (13.0%) and Hispanic (13.5%) demographic groups are almost twice as likely to take public transportation to work as the White demographic group (6.9%).

ii. Travel Time

The majority of Rockland County residents (57%) commute less than 30 minutes to work, compared with the New York MSA's 41 percent (see table 6.7). This is likely due to the County's proximity to New York City and other job centers, easy access to a number of major roadways and range of public transportation options.

Table 6.7: Travel Time (2013)

Travel Time	Rockland County		New York MSA	
	Number	Percentage	Number	Percentage
< 30 Minutes	76,602	57%	2,352,089	41%
30-59 Minutes	35,772	27%	2,141,740	37%
60 or More Minutes	21,488	16%	1,261,093	22%
Total	133,862	100%	421,903	100%

Source: 2009-2013 American Community Survey (B08303)

iii. Public Transportation

Rockland County residents have a number of public transportation options, with the Metro North Railroad, NJTransit, Haverstraw-Ossining ferry and the Transport of Rockland (TOR) bus system. Only the southern portions of Rockland County are served by rail, where the Pascack Valley Line of NJTransit and the Port Jervis Line of Metro North (an extension of the NJTransit Main/Bergen Line) run through Rockland County. The Pascack Valley Line has three stops in Rockland County: Spring Valley, Nanuet and Pearl River. As Spring Valley is the last stop on this line, this NJTransit rail line provides low income residents in Spring Valley with access to points south, including New York City. The County has one stop on the Metro North Port Jervis Line (Sloatsburg), which provides County residents with access to areas between Sloatsburg and up to Port Jervis in Orange County as well as points south, particularly New York City.

The Transport of Rockland (TOR) bus system operates 10 bus routes in the County: Routes 59, 91, 92, 93, 94, 95, 97 and Loops 1, 2 and 3, connecting residents to critical transportation links and employment centers both within and outside of the County, including the Clarkstown Mini-Trans System, Spring Valley Jitney and other regional transit services such as Rockland Coaches (Red & Tan), Short Line and NJTransit. The Tappan ZEEexpress (TZx) is Rockland County's commuter bus system, which provides service between Suffern, Airmont, Spring Valley, Nanuet, Palisades Center, Central Nyack, and South Nyack in Rockland to Tarrytown and White Plains in Westchester County, connecting residents to critical transportation links and employment centers both within and outside of the County. All TOR and TZx buses are wheelchair accessible. The TRIPS Paratransit service is available Mondays through Saturdays for persons with disabilities who qualify under the Americans with Disabilities Act (ADA) and are unable to use the TOR and TZx bus service.

Overall, Rockland County residents are well served by public transportation. However, the suburban character of the County may make it difficult for low and moderate income residents who cannot afford a car to walk to bus stops, and the County's distance to job centers, such as New York City, may create significant commutes via public transportation.

7. REVIEW OF PRIVATE SECTOR POLICIES AND PRACTICES

A. MORTGAGE LENDING POLICIES AND PRACTICES

Lenders are prohibited from discriminating against members of the protected classes when granting mortgage loans, conducting appraisals and considering whether to purchase loans. For full fair housing choice, prospective homebuyers need to have fair and equal access to mortgage credit and programs that offer home ownership without regard to race, gender, national origin, religion, disability, familial status, national origin or any other protected class. Access to mortgage credit enables residents to own their homes, and access to home improvement loans and refinancing provides resources to maintain and keep homes in good condition. Access to mortgage credit, home improvement loans and refinancing help keep neighborhoods attractive and residents vested in their communities.

Discriminatory and inadequate lending performance can result in long-term and far-ranging community problems. Disinvestment in particular is a major problem and occurs when lenders reduce financing options for borrowers. Disinvestment frequently occurs in low/moderate income and minority neighborhoods and, when it occurs, reduces the amount of competition and the number of lending options in the mortgage/financing market. This can directly result in high mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for home ownership/improvement and a lack of affordable housing. Long-term impacts on the business and private sectors can occur in the form of business relocations, closures and bankruptcy.

Discriminatory lending practices and patterns in a community can be identified through an analysis of mortgage applications and their results. The Home Mortgage Disclosure Act (HMDA) enacted by Congress in 1975 requires any commercial lending institution that makes at least five home mortgage loans annually to disclose home mortgage and home improvement lending transactions for all residential loan activities.

The most recent data available for the New York-White Plains-Wayne, NY-NJ MSA/MD, which contains Rockland County, are for 2013. The data constitute all types of applications received by lenders from families: home purchase, refinancing or home improvement mortgage applications for one-to four-family dwellings and manufactured housing units across the region. The demographic data provided pertain to the primary applicant only. Data on the disposition of loan applications by type of loan (Table 7.1) are available at the Census Tract Level, which has been aggregated to Rockland County. Data by race or ethnicity (Table 7.2) are MSA/MD wide.

Table 7.1 - Disposition of Loan Applications by Type of Loan

	Total Applications		Originated		Approved Not Accepted		Denied		Withdrawn/Incomplete	
	Total	%	Total	%	Total	%	Total	%	Total	%
Loan Purpose										
Home Purchase	14,622	38.3	8,193	56.0	661	4.5	1,784	12.2	1,549	10.6
Home Improvement	1,516	4.0	671	44.3	70	4.6	598	39.4	123	8.1
Refinancing	22,042	57.7	9,567	43.4	1,403	6.4	4,854	22.0	3,467	15.7
Home Purchase Loan Type										
Conventional	33,392	87.5	16,697	43.7	1,918	5.0	6,391	16.7	4,429	11.6
FHA	4,162	10.9	1,491	35.8	185	4.4	705	16.9	589	14.2
VA	593	1.6	226	38.1	31	5.2	139	23.4	116	19.6
FSA & RHS	33	0.1	17	51.5	0	0.0	1	3.0	5	15.2
Home Purchase Loan Property Type										
One to Four-Family Unit	37,719	98.8	18,119	48.0	2,107	5.6	7,171	19.0	5,113	13.6
Manufactured Housing Unit	43	0.1	7	16.3	10	23.3	29	67.4	0	0.0
Multifamily Unit	418	1.1	305	73.0	17	4.1	13	3.1	26	6.2

Source: Federal Financial Institutions Council (Census Tracts 101.01-134.02), 2013

Table 7.2 - Disposition of Applications for FHA, FSA/RFH, VA and Conventional Home Purchase Loans, 1 to 4-Family and Manufactured Homes by Race and Ethnicity

	Total Applications		Originated	Approved Not Accepted	Denied	Withdrawn/Incomplete
	Total	%	%	%	%	%
Applicant Race/Ethnicity						
Native American	201	0.2	27.4	4.5	30.8	12.4
Asian	16,592	18.8	64.6	5.0	17.5	12.8
Black	6,724	7.6	53.4	4.8	25.6	16.2
Hawaiian	381	0.4	53.8	6.0	25.2	15.0
White	49,959	56.7	65.9	5.4	12.4	10.7
2 or More Minority Races	75	0.1	57.3	10.7	13.3	18.7
Joint (White/Minority)	1,684	1.9	68.5	5.2	13.6	12.6
No Information	12,507	14.2	60.8	5.9	16.0	17.3
Hispanic*	8,202	9.3	55.4	5.2	23.5	16.0

Source: Federal Financial Institutions Council (New York-White Plains-Wayne, NY-NJ MSA/MD), 2013

* Hispanic ethnicity is counted independently of race.

i. Applicant Characteristics

During 2013 across Rockland County, lenders received 14,622 applications for home purchase mortgages, 22,042 applications for mortgage refinancing and 1,516 home improvement equity loans. Of these, purchase loans were the most likely to be successful, as 56.0 percent were approved. About 10.6 percent of refinancing applications were withdrawn or left incomplete and 12.2 percent were denied. By comparison, 43.4 percent of refinance loans were approved, with 15.7 percent withdrawn or incomplete and 22.0 percent denied. Home improvement loans represent only a small share of all applications, with 4.0 percent of the total, and experienced a 44.3 percent approval rate. Overall, a total of 38,180 applications were made in 2013, 18,431 (48.3%) of which were “originated,” or successful.

The majority of all applications received in the County were for one- to four-family housing structures (37,719), with 418 applications for multifamily units and 43 applications for manufactured units. The most commonly sought type of financing was for conventional loans, a category that represented 87.5 percent of all loan applications. The remaining 12.5 percent of applications were for loans insured by the Federal Housing Administration (FHA), Department of Veterans Affairs (VA) or Farm Services Administration or Rural Housing Service (FSA/RHS). FHA loans are a type of Federal assistance that has historically benefited lower-income residents.

Data on the racial/ethnic composition of loan applicants are for the New York-White Plains-Wayne, NY-NJ MSA/MD. The racial composition of loan applicants significantly differs from the County’s demographic distribution. White households represented 56.7 percent of the total loan applicants MSA/MD area wide with an approval rate of 65.9 percent and a denial rate of 12.4 percent. By comparison, although Black/African American people comprise 12.4 percent of the County’s population, Black/African American households represented only 7.6 percent of all loan applicants MSA/MD area wide with an approval rate of 53.4 percent and a denial rate of 25.6 percent. Although Hispanics represented 16.1 percent of the County’s population in 2013, Hispanic households comprised only 9.3 percent of the total loan applicants MSA/MD area wide with an approval rate of 55.4 percent and a denial rate of 23.5 percent. Lower participation in the market for home mortgages by Black/African American and Hispanic households is likely a reflection of the lower median incomes among those groups.

ii. Application Denials

In 2013, 16,537 mortgage loan applications were denied across the New York-White Plains-Wayne, NY-NJ MSA/MD. The overall cumulative denial rate was 17.2 percent with denials by race and ethnicity ranging from 12.4 percent for White households to 25.6 percent for Black/African American and 30.8 percent for Native American households. In reporting denials, lenders are required to list at least one primary reason for denial and may list up to two secondary reasons. As Table 7.3 demonstrates, the primary basis for rejection was debt-to-income ratio (24.6%) with lack of collateral (21.5%) as the secondary reason given for denials. Credit history, which was the reason given for denial in 10.6 percent of all

applications, was more prevalent in the denials for Black/African American households at 15.8 percent.

Table 7.3 Primary Reason for Mortgage Denial by Household Race/Ethnicity

	Total (%)	White (%)	Black (%)	Asian (%)	Other (%)	Hispanic*	Not Available (%)
Debt-to-Income Ratio	24.6	25.0	27.0	23.8	23.4	30.1	22.3
Employment History	2.3	2.7	1.5	2.3	1.8	2.1	2.0
Credit History	10.6	10.1	15.8	7.7	10.7	11.1	12.2
Collateral	21.5	21.4	17.0	22.7	24.3	18.8	23.5
Insufficient Cash	6.9	6.9	7.9	6.6	4.5	6.7	6.8
Unverifiable Information	6.6	6.4	5.6	7.9	5.9	5.6	6.6
Application Incomplete	15.5	15.9	11.1	17.6	17.5	13.3	14.5
Insurance Denied	0.9	1.0	1.8	0.3	0.9	1.7	0.4
Other	11.1	10.8	12.4	11.0	10.9	10.5	11.6

Source: Federal Financial Institutions Council (New York-White Plains-Wayne, NY-NJ MSA/MD), 2013

* Hispanic ethnicity is counted independently of race.

Loan applications for all types of loans within minority Census Tracts (defined as Tracts with the highest concentrations of Black/ African American, Hispanic and Yiddish Speaking persons as outlined in Section 4) accounted for 16.4 percent of all applications, with an average success rate (defined as “originated loans”) of 46.7 percent. The number of loan applications in Census Tracts with the highest concentrations of Hispanic persons represented only 4.4 percent of all applications, with a success rate ranging from 38.2 percent to 52.8 percent. The number of loan applications in Census Tracts with the highest concentrations of Black/ African American persons represented only 8.3 percent, with a success rate ranging from 27.4 percent to 49.2 percent. Similarly, the number of loan applications in Census Tracts with the highest concentrations of Yiddish speaking persons represented 3.8 percent of all applications, with a success rate ranging from 42.3 percent to 51.0 percent.

iii. High-Cost Lending

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall

disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, HMDA data have included price information for loans priced above reporting thresholds set by the Federal Reserve Board. These data are provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data do not indicate which loans are subprime. The data, however, provide price information for loans considered “high-cost.”

A loan is considered high-cost 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 applications was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

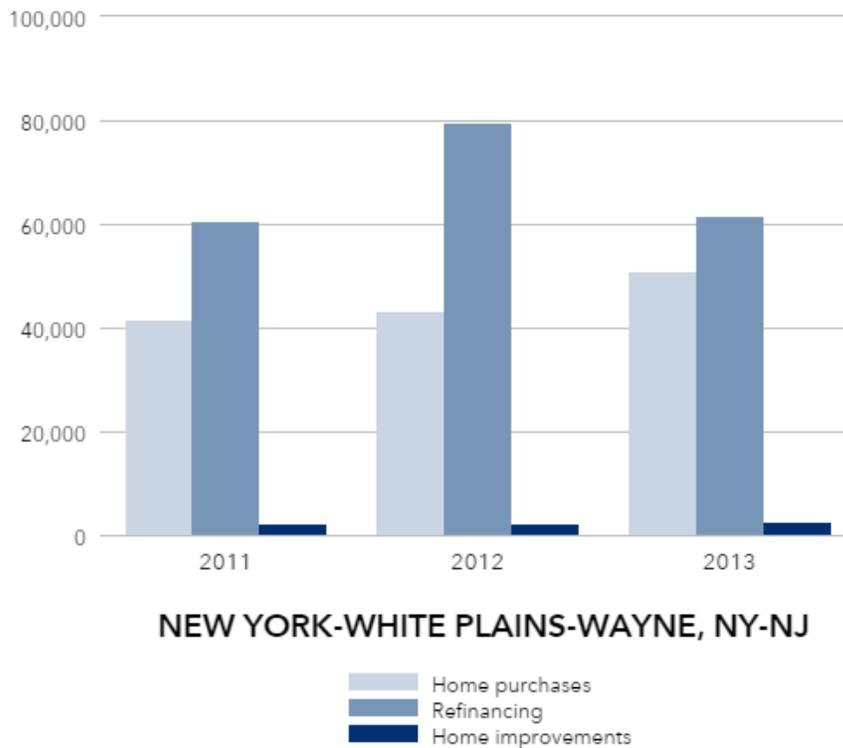
Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

In 2013, there were 43,173 conventional home purchase loans made for single- to four-family houses in the New York-White Plains-Wayne, NY-NJ MSA/MD. Of this total, 211 reported pricing data of which 51 were reported as high-cost mortgages. Overall, upper-income households (24.7%) were less likely to have high-cost mortgages than lower-income households (47.6%).

iv. Annual Trends

Studying mortgage application data on annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 7.1 illustrates annual change between 2011 and 2013.

Figure 7.1 - Annual Trends in Mortgage Applications



Source: Federal Financial Institutions Examination Council, 2013.

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2008 as a result of buyer reticence in an unstable market. While the market continues to get stronger, there are annual fluctuations. Refinancing declined in 2013, after having risen in 2012, while purchase volume increased in both years.

8. ASSESSMENT OF CURRENT FAIR HOUSING PROGRAMS AND ACTIVITIES

A. CURRENT FAIR HOUSING PROGRAMS AND ACTIVITIES

Rockland County's 2009 Analysis of Impediments to Fair Housing Choice (AI) was adopted in conjunction with the County's Consolidated Plan and outlined goals and objectives for addressing impediments for 2010-2014. This section contains actions included in the County's 2010-2014 Annual Action Plans to address each of the impediments identified in the previous AI. The following analysis summarizes the impediments identified in the previous AI and the actions taken by the County between 2010 and 2014 to address these impediments.

Impediment 1. Overall Discrimination in the Housing Market

- ❖ The previous AI reported that a total of **86 fair housing discrimination complaints** were reported to the Rockland County Commission on Human Rights Fair Housing Board, 51 percent of which were reported on the basis of a disability and 50 percent of which were reported on the basis of race (complaints can contain multiple bases).
- ❖ The previous AI also observed a **lack of housing choice** for low and moderate income households, particularly minority households, in jurisdictions with low concentrations of non-minority and/or low or moderate income households due to zoning ordinances that can impact the production of multifamily housing, emergency shelters, transitional housing and community care facilities, all of which serve lower income households and special needs populations.
- ❖ County-wide, the previous AI reported an **unwillingness by local jurisdictions to make reasonable accommodations in their zoning and land use policies to provide equal access to housing for persons with disabilities.**
- ❖ The previous AI reported that a **jurisdiction's definition of family can constrain access to housing** if it contains a restrictive definition of a family and can be used to discriminate against nontraditional families and **illegally limit the development and siting of group homes for individuals with disabilities.**

Actions that the County has taken to address these issues include:

- Rockland County has taken steps to address the issues revealed by the paired testing results, providing continuous funding for fair housing outreach from 2010-2014, the duration of the previous AI and Consolidated Plan. Activities funded included working with Legal Aid to educate very low income individuals on their rights and working with WRO to conduct public meetings providing fair housing education to home seekers and landlords within all of the County's towns and villages in 2012. WRO also conducted fair lending tests in 2013-2014, which includes some testing in Rockland County.
- All 24 municipalities in Rockland County have land use regulatory authority and have enacted their own zoning codes. This means that land use in Rockland County is governed by 24 local zoning ordinances, with the provisions of these ordinances

varying significantly from one community to another. As Rockland County has a limited role in land use and planning at the local level, zoning and land use issues need to be addressed at the local level.

Impediment 2. Discriminatory Lending Policies and Practices

- ❖ The 2009 AI reported that the **stringent requirements for FHA loans, which allow lower income households to purchase homes, including regulations for qualifying properties and condominium purchases, can pose barriers for potential low income home buyers.**
- ❖ The 2009 AI concluded that **affordable FHA loans and municipally-sponsored first-time homebuyer programs, which require more time and effort, could be difficult for buyers to access** due to loan officers and realtors' preference to focus on conventional mortgages.
- ❖ The 2009 AI reported that **subprime mortgages, which have a strong link to foreclosure, disproportionately occurred in communities of color** in the County.
- ❖ The **Black demographic group experienced a higher rate of denial** for conventional home purchase loans than White or Asian demographic groups.

The discriminatory lending policies and practices identified above are primarily issues at the state and national scale and can best be addressed at the macro level. No actions were taken between 2010 and 2014 by the County to remedy the discriminatory lending policies and practices identified in the previous AI.

Impediment 3. Lack of Affordable Housing to Serve Protected Classes

- ❖ The 2009 AI reported that the County had a significant and growing need for affordable housing, with **additional specialized housing and housing choice** needed for certain protected classes, particularly **disabled persons, minority populations and senior citizens.**
- ❖ The 2009 AI reported that many jurisdictions in the County did not currently have land use policies and zoning in place which would permit the development of a full range of choices to meet the County's diverse housing needs and facilitate fair housing choice for all segments of the population.
- ❖ The 2009 AI reported that **the demand for affordable housing needed is greater than the supply.** The County is particularly in need of high quality housing for seniors and the disabled as well as market rate and affordable housing for the local workforce.
- ❖ The 2009 AI reported that **limited sources of funding to finance affordable housing** and the significant competition for this funding are major impediments to fair housing choice.

Actions that the County has taken to address these issues include:

- The County assisted in the development of 93 new and reconstructed affordable housing units between July 1, 2010 and June 30, 2014.

- Rockland County is a small county with 40 percent of its land area dedicated to preserved parks and open space, with little available land for new development. Limited sources of funding to finance affordable rental and ownership housing remain an impediment.

Impediment 4. Inadequate Knowledge of Fair Housing Rights and Requirements

- ❖ The 2009 AI reported that given the increasing diversity of the County's population, fair housing education is critical. The 2009 AI also reported that although the County continued to support fair housing programs, **limited resources for staffing, funding and partnering with local nonprofit organizations posed challenges** for providing fair housing programs.
- ❖ The 2009 AI concluded that the based on input from stakeholders and fair housing organizations, focus group attendees and County staff, **general public education and awareness is limited**. This was particularly evident with respect to religion, race, ethnicity and disability status, and research conducted for the previous AI suggested that members of these protected classes had a limited general understanding of the laws and specific fair housing requirements concerning access to all types of housing in all areas of the County.

Actions that the County has taken to address these issues include:

- Rockland County has taken steps to address the issues revealed by the paired testing results, providing continuous funding for fair housing outreach from 2010-2014, the duration of the previous AI and Consolidated Plan. Activities funded included working with Legal Aid to educate very low income individuals on their rights and working with WRO to conduct public meetings providing fair housing education to home seekers and landlords within all of the County's towns and villages in 2012. WRO also conducted fair lending tests in 2013-2014, which includes some testing in Rockland County.

9. FAIR HOUSING OBSERVATIONS AND IMPEDIMENTS TO FAIR HOUSING CHOICE

A. FAIR HOUSING OBSERVATIONS

i. Key Demographic and Market Analysis Observations

a. Demographic Profile

- The County's population is growing, as between 2000 and 2011 the population of Rockland County grew by 7 percent to 299,975 persons while the number of households grew by 5 percent to 96,162 households. In 2013, according to *2009-2013 American Community Survey (ACS)* data, the population of Rockland County was 315,069, an increase of 5 percent from 2011, with 98,326 households.
- While all of the towns within the County experienced population growth between 2000 and 2011, the Towns of Ramapo (14.4%) and Haverstraw (7.3%) experienced the largest increases.
- All but four of the County's 19 villages demonstrated a population growth between 2000 and 2011, with the Villages of New Square (44.2%), Kaser (37.7%), Spring Valley (21.0%) and Montebello (20.3%) in the Town of Ramapo experiencing the largest population growth.
- There are 17 hamlets located in the County that are identified as Census Designated Places by the Census Bureau. The most significant increases in population in the County's Census Designated Places occurred in Orangeburg in the Town of Orangetown (34.8%), Viola in the Town of Ramapo (25.3%) and Hillcrest in the Town of Ramapo (17.5%).
- Between 2000 and 2011 the median income of Rockland County households grew by almost a quarter from \$67,821 to \$84,661. At the same time, the poverty rate grew by 2.1 percent from 9.5 percent to 11.6 percent.
- Although the median household income increased significantly in all five of the County's towns, the rate of change varied significantly, with Stony Point demonstrating the most significant change (42.2%) and Ramapo experiencing the least growth of median income (15.4%) – see Table 3.3. In 2011, The Towns of Stony Point, Clarkstown and Orangetown were estimated to have the largest increases and highest median incomes in the County, with median incomes of \$102,326, \$102,065 and \$91,618, respectively. The Towns of Haverstraw and Ramapo, with median incomes of \$71,512 and \$69,635, had the lowest median incomes in the County in 2011.

- At the same time, all but one (1) of the County's five (5) towns experienced an increase in the number of people living below the poverty line. The poverty rate decreased slightly for Stony Point between 2000 and 2011, while it increased by 3.30 percent in Ramapo during the same period of time. The Town of Haverstraw experienced the second highest increase of poverty rate, with an increase of one percent.
- Although Rockland County experienced a moderate population loss in persons reporting English, German, Italian and Russian heritage between 2000 and 2013, the number of people reporting Eastern European heritage (50.5%), European heritage (418.3%), Hungarian heritage (147%), Polish heritage (11.2%) and West Indian heritage (35.3%) increased significantly.
- In 2013, there were an estimated 69,191 (17.4%) foreign born persons in Rockland County. This is significantly lower than the foreign born population in the New York MSA as a whole, which was estimated at 30.1 percent in 2013. However, the County's foreign born population increased by approximately 14,425 (26.3 percent) between 2000 and 2013.
- Nearly two-thirds of the County's foreign-born population were born in Latin America, with the majority coming from the Caribbean region (19,110). The countries most represented in the County's foreign-born population are: Haiti (9,683 persons), India (5,526 persons), Guatemala (5,177 persons), Dominican Republic (5,131 persons) and Ecuador (3,725 persons).
- In 2013, an estimated 55.3 percent of the County's foreign born population were naturalized citizens. Within Rockland County, 73.4 percent of the foreign born population from Europe was naturalized and 71.3 percent of the foreign born population from Asia was naturalized, compared with 40.7 percent for persons born in Latin America.
- In 2013, an estimated 47,944 persons in Rockland County spoke English less than "very well," representing 16.5 percent of the County's population among persons ages 5 and above (*2009-2013 American Community Survey*). Spanish/Spanish Creole (38.4%), Yiddish (25.7%) and French Creole (11.8%) speakers who spoke English less than "very well" made up the majority (75.9%) of all speakers with Limited English Proficiency (LEP) in Rockland County.
- The overall distribution of the County's population by race has shifted between 2000 and 2013. Between 2000 and 2013, the ratio of White people is estimated to have decreased by the same amount that the ratio of the racial minority population increased (4.7%). As a percentage of the overall population, the All Other Races racial minority category experienced the biggest change between 2000 and 2013, from 4.1 percent to 7.4 percent of the population. The ratio of Hispanic/Latino

persons in Rockland County increased by nearly six percentage points between 2000 and 2013.

- The three largest ethnic/racial demographic groups in Rockland County are White, Hispanic and Black. Within this group, the White demographic has the highest median income and the Black demographic group has a median household income rate that is 23.6 percent lower than the White median income. However, the poverty rate for the White demographic group is higher than for the Black demographic group. The Hispanic demographic has the lowest median income and highest poverty rate, although rates for all demographic groups are much higher than in the New York MSA.
- In 2013, the unemployment rate in Rockland County (8.3%) was significantly lower than for New York State as a whole (16.0%). Black and Hispanic residents were more likely to be unemployed than White Residents, with unemployment rates of 13.0 percent and 10.6 percent respectively, compared with the White rate of 7.3 percent.
- Nearly one third of Rockland County's residents are Jewish, or roughly 100,000 persons today, and the County may have the highest Jewish population per capita of any County in the U.S.⁹⁴. The Villages of New Square, Kaser, New Hempstead, Wesley Hills and the hamlet of Monsey comprise major centers of Jewish culture.
- A large portion (13.9 percent) of the County's estimated population is aged 65 and over in 2013.
- An estimated 16.2 percent of the disabled population over 5 years of age in Rockland County was estimated to live below the poverty level in 2013 (2011-2013 ACS).

b. Housing Profile

- In 2013 the number of new housing units permitted reached pre-recession levels; however the composition of the types of new units being developed has drastically changed (see Table 3.18). In 2008 only 24.3 percent of all new housing units were in multi-family buildings (2+ units), while in 2014 multi-family units comprised 76.2 percent of the new housing stock permits.
- Approximately two thirds (67%) of the 101,353 housing units in Rockland County are either single-family detached or single-family attached, while multifamily units, consisting of two or more units, make up 32 percent of the housing stock.

⁹⁴ Rockland County, *Rockland Tomorrow: Rockland County Comprehensive Plan*, March 1, 2011.

- Single family detached units comprised equal to or less than 25 percent of the housing stock in fifteen (15) Census Tracts, with Census Tract 124.01 in the Village of Spring Valley having the fewest single-family detached units at 2.3 percent. The higher concentrations of multi-family units are located in the County's villages including Spring Valley, Kaser, Haverstraw and Nyack.
- According to 2007-2011 ACS data, the County's total occupied housing inventory of 96,162 units is 71.2 percent owner-occupied and 28.8 percent renter-occupied.
- In 2011 in Rockland County, Whites had a homeownership rate of 74.7 percent. By comparison, Blacks/African Americans owned their homes at a rate of 53.3 percent and Hispanics, 48.3 percent. Asians had a home ownership rate of 82.2 percent, the highest of any race or ethnic group, although they represent only 6.1 percent of the County's population.
- In Rockland County, minorities were more likely than Whites to live in a larger household. In 2010, the average household size for Whites was 2.94, compared with 3.23 for Black/African American households and 3.94 for Hispanic households.
- Between 2000 and 2011, the cost of housing significantly increased for Rockland County renters and homeowners - the median home value increased 99 percent while the median contract rent increased 43 percent.
- In 2011 Rockland County's Fair Market Rent for a two-bedroom unit was \$1,474, which increased modestly to \$1,481 in 2015. The HUD Fair Market Rents are higher than the County's median contract rent (\$1,156), but in line with the actual rents paid with approximately three out of four renters (73.8%) in the County paying less than \$1,500 per month on rent (although these data do not distinguish between the different unit bedroom breakdowns). In order to be able to afford to pay \$1,500 in rent without being cost-burdened (spending 30 percent or more on housing costs), a Rockland County household would need to earn \$5,000 monthly/\$60,000 annually which is 29 percent less than the average median household income for the County.

ii. Key Integration and Segregation Observations

- Twenty Census Tracts within the County have been identified as an area of racial concentration for the Black demographic within the context of Rockland County. Within these tracts, 10 Census Tracts contain the highest concentrations, comprising of 25.5 percent to 62.8 percent of a Tract's total population. The majority of the Census Tracts identified as areas of concentration are located in the Towns of Ramapo and Haverstraw.
- The Latino/Hispanic population comprised 16.1 percent of the population in the County, which is significantly lower than the New York MSA's 24.4 percent. Twenty-one (21) Census Tracts have been identified as areas of racial concentration for the Hispanic population, ten (10) of which exceed County averages.
- In 2013, the Yiddish speaking population was estimated to number 23,242, which accounts for eight (8) percent of the County's population ages 5 and above.⁹⁵ The portion of the Yiddish speaking population has grown, as in 2000 the Yiddish speaking population represented five (5) percent of the population.⁹⁶ In contrast, the Yiddish speaking population accounted for only one (1) percent of languages spoken by persons ages 5 and above in the New York MSA in 2013.
- The majority of the Census Tracts identified as areas of concentration for the Yiddish speaking population, defined as exceeding 8 percent of the County's population, are located in the Town of Ramapo. The portion of this population ranges from 8.3 percent in the Village of Montebello and Viola CDP to 88.6 percent in an area that includes the majority of the Village of Kaser. The highest concentrations of Yiddish speaking persons are located in the Villages of New Square and Kaser, the Monsey CDP and in portions of the Villages of Spring Valley, Chestnut Ridge, Airmont and Montebello as well as Viola CDP.
- The White-Black index of dissimilarity for Rockland County is 55 percent, indicating that 55 percent of either the White or Black demographic would have to move to a different Census Tract to create even population distribution between the two groups.
- The White-Hispanic index of dissimilarity for Rockland County is 46.5 percent, indicating that 46.5 percent of either the White or Hispanic demographic would have to move to a different Census Tract to create even population distribution between the two groups.

⁹⁵ 2009-2013 American Community Survey, U.S. Census Bureau.

⁹⁶ 2000 Census, U.S. Census Bureau.

- The English-Yiddish index of dissimilarity for Rockland County is 86.1 percent, indicating that 86.1 percent of either the English Speaking or Yiddish speaking demographic would have to move to a different Census Tract to create even population distribution between the two groups.
- Isolation indices calculated for the County indicate that the White demographic group is the most isolated demographic group in the County, demonstrating high levels of isolation, while the Hispanic and Black demographic groups experience moderate isolation.
- The isolation indices calculated for the English and Yiddish speaking populations indicate that members of both groups experience little interaction with members of different linguistic groups.
- All but four (4) of the 57 block groups classified above as concentrated areas of poverty are located within Census Tracts that have been identified as a Yiddish speaking, racially or ethnically concentrated area (see Section A, above). Overall, 26 of the 29 Census Tracts within the County identified as Yiddish speaking, racial and/or ethnic areas of concentration included areas where at least 40 percent of residents met the definition for low and moderate income status.
- While the low and moderate income population is concentrated in only 3.5 percent of the County's block groups, the majority of these block groups are located in areas of concentration for the Yiddish speaking, Black and Hispanic demographic/linguistic groups, demonstrating significant residential segregation patterns.
- The analysis of community assets shows that the County's strongest community assets continue to be transportation and parks/open space. These assets serve residents of racially/ethnically concentrated areas of poverty fairly well. However, low and moderate income minority residents in Nyack, Haverstraw, West Haverstraw and particularly Spring Valley experience disparities in access to good public schools compared with other school districts in Rockland County.

iii. OTHER OBSERVATIONS

- Between 2010 and 2014, 14 fair housing complaints were processed by the New York State Division of Human Rights (NYSDHR) and 44 were processed by Rockland County Commission on Human Rights (RCCHR) Fair Housing Board.
- According to advocacy organizations for persons with disabilities, the limited availability of affordable and accessible housing units is a significant impediment to fair housing choice in Rockland County. One out of every two housing discrimination complaints in the County processed by HUD, NYSDHR and RCCHR were filed by persons with disabilities, who frequently report barriers to obtaining reasonable accommodations or modifications. The age of the County's housing stock and associated cost of retrofitting older structures is a significant impediment.
- There are 47,944 Limited English Proficiency (LEP) persons in the County, comprising 16.5 percent of the total population. Limited English Proficiency (LEP) groups in the County meet HUD-mandated thresholds for the assessment provision of language assistance include the Spanish/Spanish Creole, Yiddish, French Creole, Chinese and Russian language groups.
- The zoning ordinance analysis of 22 of the 24 jurisdictions in Rockland County identified 231 unique zoning districts that regulate permitted uses and bulk regulations in Rockland County. Of the 231 zoning districts assessed, 168 districts permit residential use. Overall, seven (7) zoning ordinances do not incorporate zoning districts that permit the development of new multifamily uses of 3 or more units and ten (10) municipalities contain zoning districts that permit multifamily uses either as of right or via special permit.
- According to the U.S. Bureau of Labor Statistics, the 2010 Consumer Price Index (CPI) for the New York-Northern New Jersey-Long Island, NY-NJ-PA metro area is 259.64, significantly higher than the U.S. urban average CPI of 236.11.
- Four of the top five (5) counties with the highest average 2014 property taxes in dollars for single family homes are located in the New York metro area, indicating that high property taxes are prevalent in the region. Rockland County is ranked number four in the New York metro area in terms of property taxes paid and tax as a percentage of household income.

B. IMPEDIMENTS TO FAIR HOUSING CHOICE

i. Public Sector

Impediment #1: Real Estate Market Prices

Proximity to the New York City job market has bolstered high property values in the southern areas of Rockland County in the past decade. Median home prices have been soaring in recent years as home buyers and renters get priced out of other markets, including Westchester County and parts of New Jersey and Connecticut. The 2011 median home value was \$465,100, a 99 percent increase over the 2000 median home values of \$234,300. Contract rents also increased from \$811 in 2000 to \$1,156 in 2011 (a 43% increase).

Rockland County has the highest average median household income (\$84,661) and the highest allowable fair market rental rates in the State of New York. However, while the median home value has dramatically increased over the past decade to \$465,100, Rockland County remains relatively affordable compared with neighboring Westchester County where the average median home value is \$547,000. Median home values vary by community from a high of \$740,800 in parts of the Town of Ramapo and Villages of Montebello, South Nyack and Grand View on Hudson, to a low of \$140,000-\$272,900 in portions of the Village of Spring Valley.

The Town of Haverstraw and the Village of Spring Valley have experienced the gradual erosion of rent control/stabilized buildings and units within their communities. For the past two decades, the rent laws have provided for the deregulation of rent controlled/stabilized apartments based on rents and occupants' incomes reaching certain levels. Additionally, many older, and more affordable, multi-family buildings in the County's villages are being torn down and replaced with newer, and more expensive, housing. This loss of affordable housing in what is already a very tight market further exacerbates the County's affordable fair housing issues. This loss of affordable units restricts housing choice for low and moderate income minority groups, particularly the Black and Hispanic demographic groups, who have significantly lower incomes than the White demographic group. According to service providers and County officials, the high cost of living has led to significant illegal housing issues in the County, particularly for the Haitian populations in Spring Valley, Ramapo and Haverstraw.

The Rockland County Fair Market Rents are typically not representative of fair market rents for the County's low and moderate income population who earn less than the County's median income. In 2011 Rockland County's Fair Market Rent for a two-bedroom unit was \$1,474 (Table 36), which increased modestly to \$1,481 in 2015. The HUD Fair Market Rents are higher than the County's median contract rent (\$1,156), but in line with the actual rents paid with approximately three out of four renters (73.8%) in the County paying less than \$1,500 per month on rent. In order to be able to afford to pay \$1,500 in rent without being cost-burdened (spending 30 percent or more on housing costs), a Rockland County household would need to earn \$5,000 monthly/\$60,000 annually which is 29 percent less than the average median

household income for the County. Additionally, while there are 10,854 households (39% of all occupied rental households) who spend more than 30 percent of their income on housing, this number has decreased from 13,361 rental households in 2008.

The tax burden in Rockland County is another significant influence on housing costs. The property tax burden in Rockland County adversely affects housing costs for people of all incomes but makes homeownership particularly challenging for extremely low to moderate income households. High tax rates can also be burdensome to low-income homeowners and can result in high rents.

Goal:

- Continue to increase the number of quality affordable rental and ownership housing opportunities in the County.

Action:

- Work with local jurisdictions to identify appropriate opportunities for acquisition for the development and/or preservation of affordable housing units.
- Continue to provide Tenant Based Rental Assistance to low and moderate income households.

Impediment #2: Lack of Land Available and Suitable for Housing Development

Rockland County is a small county with 40 percent of its land area dedicated to preserved parks and open space, with little available land for new development, posing significant challenges to financing affordable housing development. The County has assisted in the development of 93 new and reconstructed affordable housing units between July 1, 2010 and June 30, 2014.

Goals:

- Continue to support affordable housing production in all areas of the County.
- Facilitate access to below market rate units.

Actions:

- Continue to support local affordable housing developers through a variety of strategies such as applications for State and Federal funding, entitlement assistance, outreach to the community and other stakeholders, financial support and site identification.
- Seek out and identify Federal and local funding opportunities for creating new affordable housing development.
- Continue to assist affordable housing developers in advertising the availability of below market rate units via the jurisdictions' websites and other media outlets.

Impediment #3: Local Zoning Ordinances

The creation of affordable housing units for low and moderate income households and protected classes has been made a priority by Rockland County, and was raised as a potential

impediment in the *2010-2014 Analysis of Impediments to Fair Housing Choice* and the County's *2011 Comprehensive Plan*. Although a number of issues contribute to difficulties in creating affordable housing, including high property values and limited quantities of land available for construction, the development of local zoning laws that facilitate the development of affordable housing is recognized in the Rockland County 2011 Comprehensive Plan as a critical step toward creating more affordable housing units.

Goals:

- Ensure low and moderate income residents have access to affordable housing opportunities in all communities.

Actions:

- Conduct an extensive zoning analysis, assessing definitions of family, the feasibility of building affordable multifamily development (dimensions and uses) and whether any zoning codes violate Federal, State and/or local fair housing regulations.
- Work with local jurisdictions to establish a model multifamily zoning ordinance encouraging the development of affordable housing that is appropriate for a range of jurisdictions.
- Establish a model affordable housing ordinance establishing specific requirements and incentives for the creation of affordable housing; encourage local jurisdictions to adopt a similar provision.
- Evaluate the feasibility of establishing a task force with representatives from a range of jurisdictions to address this issue.

Impediment #4: Lack of Affordable Housing to Serve Protected Classes

There is a very limited number of affordable rental units in Rockland County. Most new rental housing being constructed in the County is targeted at middle and upper income households. Based on input received from service providers, there is a need for the following types of housing:

- Housing for large families – three plus (3+) bedroom units have been identified as a need. These units are often not cost effective for developers to build. Additionally, many communities, worried about school children enrollment, prefer to see smaller 1 and 2-bedroom units constructed.
- Studios – smaller rental units, appropriate for the elderly, single homeless individuals or young adults, are identified as a need. These units typically rent for less than a one bedroom unit.
- Accessible units – there are a limited number of accessible units in the County which are in high demand by a range of special needs populations (elderly, persons with disabilities, disabled veterans, etc.). New units or retrofitted units are a priority need.
- Supportive housing for persons with disabilities – there is a push to move mentally ill or disabled adults out of nursing homes and into alternative housing. Currently there are limited options for this population in Rockland which often forces them to leave the County.

Goals:

- Continue to support affordable housing production in all areas of the County (see Impediment #2).
- Expand the number of affordable accessible units available.
- Increase housing opportunities for large families and families with children.
- Continue to provide housing opportunities for seniors.

Actions:

- See Impediment #2 for actions addressing the goal of continuing to support affordable housing production in all areas of the County.
- Facilitate communication between special needs service providers and affordable housing developers to ensure that persons with special needs have fair access to available units.
- Provide training workshops for design professionals and County staff addressing accessibility features.
- Work with developers to ensure there are accessible units.
- Evaluate establishing a provision requiring a specific set aside of accessible units for all new residential developments.
- Encourage the adoption of accessible universal design standards for new and substantial rehabilitation projects.
- Work with developers to ensure the creation of new three or more bedroom units.
- Continue to work with jurisdictions and developers to provide quality housing units for seniors.

Impediment #5: Age and Condition of the Housing Stock

The overwhelming majority (75%) of the County's housing units was constructed on or before 1979. Approximately 48 percent of renters and 39 percent of homeowners have reported at least one major condition or problem on their property in need of repair. Because of the County's aging housing stock, substandard housing and lead based paint hazards are issues in Rockland County where there is a significant need for owner and rental household rehabilitation.

All new housing and rehabilitated housing of four units and above must follow New York State building code accessibility guidelines for the disabled. This means that first floor units must be handicapped adaptable. As the majority of the County's multifamily buildings were constructed prior to the March 13, 1991 enactment of the accessibility requirements of the Fair Housing Act, older multi-family structures are often exempt from accessibility requirements.

Goals:

- Rehabilitate aging and deteriorated housing stock.
- Continue to eliminate lead based paint hazards in existing units.
- Expand the number of affordable accessible units available (see Impediment #4).

Actions:

- Continue to utilize CDBG, HOME and related funds to provide for housing rehabilitation and related services.
- Continue to undertake inspections of housing units suspected of containing lead-based paint.
- See Impediment #4 for actions addressing the goal of expanding the number of affordable accessible units available.

Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements

Between January 2010 and March 2015, the Rockland County Commission on Human Rights Fair Housing Board received a total of 44 complaints while the New York State Division of Human Rights received 14 complaints. The 2009 AI reported that given the increasing diversity of the County's population, fair housing education is critical. The previous AI also reported that although the County continued to support fair housing programs, there are limited resources for staffing, funding and partnering with local nonprofit organizations for fair housing programs.

Rockland County has taken steps to address the issues revealed by the paired testing results, providing continuous funding for fair housing outreach from 2011-2014, the duration of the previous AI and Consolidated Plan. Activities funded included working with Legal Aid to educate very low income individuals on their rights and working with WRO to conduct public meetings providing fair housing education to home seekers and landlords within all of the County's towns and villages in 2012. WRO also conducted fair lending tests in 2013-2014, which includes some testing in Rockland County.

Goal:

- Expand local knowledge of fair housing rights, requirements and responsibilities.

Actions:

- Work with service provider(s) to sponsor targeted workshops and training services to specific populations, which may include County staff members, landlords, realtors, design professionals, grant sub-recipients and the general public.
- Support housing counseling services and financial education sessions in Rockland County on a regular basis.
- Hold at least one County meeting annually to discuss issues related to fair housing, including education efforts and outreach.
- Work with service provider(s) to provide education to tenants regarding the availability of programs, their rules and procedure for obtaining information and filing complaints.

Impediment #7: Loss of Subsidized and Affordable Housing Stock

The Town of Haverstraw and the Village of Spring Valley have experienced the gradual erosion of rent control/stabilized buildings and units within their communities. For the past two decades, the rent laws have provided for the deregulation of rent controlled/stabilized apartments based

on rents and occupants' incomes reaching certain levels. Additionally, many older, and more affordable, multi-family buildings in the County's villages are being torn down and replaced with newer, and more expensive, housing. This loss of affordable housing in what is already a very tight market further exacerbates the County's affordable fair housing issues. This loss of affordable units restricts housing choice for low and moderate income minority groups, particularly the Black and Hispanic demographic groups, who have significantly lower incomes than the White demographic group.

Goals:

- Continue to support affordable housing production in all areas of the County (see Impediment #2).
- Consider alternative strategies to maintain current levels of affordability in projects converting to market rate.
- Increase tenant education regarding their rights under existing rent regulation programs by expanding local knowledge of fair housing rights, requirements and responsibilities (see Impediment #6).

Actions:

- See Impediment #2 for actions addressing the goal of continuing to support affordable housing production in all areas of the County.
- Work with service provider(s) to contact building owners regarding information on alternative funding sources.
- See Impediment #6 for actions addressing the goal of increasing tenant education regarding their rights under existing rent regulation programs by expanding local knowledge of fair housing rights, requirements and responsibilities.
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ii. Private Sector

Impediment #8: Overall Discrimination in the Housing Market

Between 2010 and 2014, 14 fair housing complaints were processed by NYSDHR and 44 were processed by RCCHR. Between 2009 and July 2010, WRO conducted 125 paired tests at real estate offices in Putnam, Rockland and Westchester Counties. WRO concluded that the highest percentage of unequal tests came from real estate agencies in Rockland County, where WRO had not previously engaged in extensive fair housing education of real estate professionals. Rockland County has taken steps to address the issues revealed by the paired testing results, providing continuous funding for fair housing outreach from 2011-2014, the duration of the previous AI and Consolidated Plan. Activities funded included working with Legal Aid to educate very low income individuals on their rights and working with WRO to conduct public meetings providing fair housing education to home seekers and landlords within all of the County's towns and villages in 2012. At the time this Plan was published, WRO informed the County that the results of their 2013-2014 fair lending tests would be released in the summer of 2015, which includes some testing in Rockland County.

Goals:

- Increase fair housing choice for low and moderate income households, particularly in the County's non-impacted areas and areas in need of reinvestment.
- Increase fair housing choice for the disabled by expanding the number of affordable accessible units available (see Impediment #4)
- Increase fair housing choice for large families and families with children by expanding opportunities for these households (see Impediment #4).
- Increase fair housing choice for seniors by continuing to provide housing opportunities to seniors (see Impediment #4).
- Work to reduce local opposition to affordable housing when it occurs.
- Establish funding and economic development policies that will promote fair housing choice throughout the County via the creation of new affordable housing units.

Actions:

- Identify suitable properties in non-impacted areas and areas in need of reinvestment and collaborate with affordable housing developers.
- See Impediment #4 for actions addressing the goal of expanding the number of affordable accessible units available.
- See Impediment #4 for actions addressing the goal of increasing fair housing choice for large families and families with children by expanding opportunities for these households.
- See Impediment #4 for actions addressing the goal of increasing fair housing choice for seniors by continuing to provide housing opportunities to seniors.
- Hold community-wide housing forums when significant opposition to affordable housing occurs.
- Applicants and developers receiving Federal funds administered by the County for housing purposes must give priority emphasis to the locations of greatest need within Rockland County:
 1. Areas in which affordable housing options are underrepresented.
 2. Areas which have experienced significant vacancy, abandonment or disinvestment.

Impediment #9: Discriminatory Lending Policies and Practices

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair. In 2013, there were 43,173 conventional home purchase loans made for single- to four-family houses in the New York-White Plains-Wayne, NY-NJ MSA/MD. Of this total, 211 reported

pricing data of which 51 were reported as high-cost mortgages. Overall, upper-income households (24.7%) were less likely to have high-cost mortgages than lower-income households (47.6%).

Goals:

- Reduce housing lending discrimination in Rockland County by expanding local knowledge of fair housing rights, requirements and responsibilities (see Impediment #6).
- Educate households and housing-related organizations about fair housing law with respect to lending practices by expanding local knowledge of fair housing rights, requirements and responsibilities (see Impediment #6).

Actions:

- See Impediment #6 for actions addressing the goal of expanding local knowledge of fair housing rights, requirements and responsibilities
- See Impediment #6 for actions addressing the goal of educating households and housing-related organizations about fair housing law with respect to lending practices by expanding local knowledge of fair housing rights, requirements and responsibilities.

10. FAIR HOUSING ACTION PLAN 2015-2019

Goals	Actions	Benchmarks	Timeline
Impediment #1: Real Estate Market Prices			
Continue to increase the number of quality affordable rental and ownership housing opportunities in the County.	<p>Work with local jurisdictions to identify appropriate opportunities for acquisition for the development and/or preservation of affordable housing units.</p> <p>Continue to provide Tenant Based Rental Assistance to low and moderate income households.</p>	<p>Maintain inventory of suitable properties and a strategy for acquisition and development – See Impediment #3.</p> <p>Programs funded and number of households assisted.</p>	<p>Annually</p> <p>Annually</p>
Impediment #2: Lack of Land Available and Suitable for Housing Development			
<p>Continue to support affordable housing production in all areas of the County.</p> <p>Facilitate access to below market rate units.</p> <p>Ensure low and moderate income residents have access to affordable housing opportunities in all communities by encouraging localities to update their zoning ordinances and take other steps to encourage affordable housing development (see Impediment #3).</p>	<p>Continue to support local affordable housing developers through a variety of strategies such as applications for State and Federal funding, entitlement assistance, outreach to the community and other stakeholders, financial support and site identification.</p> <p>Seek out and identify Federal, State and local funding opportunities for creating new affordable housing development.</p> <p>Continue to assist affordable housing developers in advertising the availability of below market rate units via jurisdiction websites and other media outlets.</p>	<p>Programs funded and number of rehabilitated housing units.</p> <p>Programs funded and number of rehabilitated housing units.</p> <p>Number of units advertised.</p>	<p>Annually</p> <p>Annually</p> <p>Annually</p>
Impediment #3: Local Zoning Ordinances			
Ensure low and moderate income residents have access to affordable housing opportunities in all communities by encouraging localities to update their	Conduct an extensive zoning analysis, assessing definitions of family, the feasibility of building affordable multifamily development (dimensions and uses), and whether any	Report outlining the extensive zoning analysis is undertaken by the Department of Planning and released to the public.	2017

<p>zoning ordinances and take other steps to encourage affordable housing development.</p>	<p>zoning codes violate Federal, State and/or local fair housing regulations.</p>		
	<p>Work with local jurisdictions to establish a model multifamily zoning ordinance encouraging the development of affordable housing that is appropriate for a range of jurisdictions.⁹⁷</p>	<p>Establish an infrastructure for input from local jurisdictions.</p>	<p>2018</p>
	<p>Release a completed model multifamily zoning ordinance to the public.</p>	<p>2018</p>	
	<p>Establish a model affordable housing ordinance establishing specific requirements and incentives for the creation of affordable housing; encourage local jurisdictions to adopt a similar provision.</p>	<p>Release a completed model affordable housing provision to the public.</p>	<p>2018</p>
	<p>Evaluate the feasibility of establishing a task force with representatives from a range of jurisdictions to address this issue.</p>	<p>Determine whether to establish a task force to address this issue.</p>	<p>2018</p>
<p>Impediment #4: Lack of Affordable Housing to Serve Protected Classes</p>			
<p>Continue to support affordable housing production in all areas of the County (see Impediment #2).</p> <p>Expand the number of affordable accessible units available.</p>	<p>See Impediment #2: Lack of Land Available and Suitable for Housing Development.</p>	<p>See Impediment #2: Lack of Land Available and Suitable for Housing Development.</p>	<p>See Impediment #2</p>
	<p>Facilitate communication between special needs service providers and affordable housing developers to ensure that persons with special needs have fair access to available units.</p>	<p>Number of new units occupied by persons with mobility or sensory disabilities.</p>	<p>Annually</p>
	<p>Provide training workshops for design professionals and County staff addressing accessibility features.</p>	<p>Number of participants.</p>	<p>2016</p>
	<p>Evaluate establishing a provision requiring a specific</p>	<p>Determine the feasibility of this approach.</p>	<p>2016</p>

⁹⁷ In 2010, Westchester County developed and approved Model Ordinance Provisions and then distributed them to local jurisdictions to adopt and conducted training and information sessions. As of March 31, 2013, 12 municipalities had adopted some or all components of the model ordinance.

<p>Increase housing opportunities for large families and families with children.</p> <p>Continue to provide housing opportunities to seniors.</p>	<p>set aside of accessible units for all new residential developments.</p> <p>Encourage the adoption of accessible universal design standards for new and substantial rehabilitation projects.</p> <p>Work with developers to ensure the creation of new three or more bedroom units.</p> <p>Continue to work with jurisdictions and developers to provide quality housing units for seniors.</p>	<p>New universal design standards.</p> <p>Number of new three or more bedroom units created.</p> <p>Inventory of senior and frail elderly units.</p>	<p>2017</p> <p>Annually</p> <p>Annually</p>
<p>Impediment #5: Age and Condition of the Housing Stock</p>			
<p>Rehabilitate aging and deteriorated housing stock.</p> <p>Continue to eliminate lead based paint hazards in existing units.</p> <p>Expand the number of affordable accessible units available (see Impediment #4).</p>	<p>Continue to utilize CDBG, HOME and related funds to provide for housing rehabilitation and related services.</p> <p>Continue to undertake inspections of housing units suspected of containing lead based paint.</p> <p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>Programs funded and number of rehabilitated housing units.</p> <p>Number of inspections undertaken.</p> <p>Number of units with lead based paint abatement performed.</p> <p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>Annually</p> <p>Annually</p> <p>Annually</p> <p>See Impediment #4</p>
<p>Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements</p>			
<p>Expand local knowledge of fair housing rights, requirements and responsibilities.</p> <p>Educate households and housing-related organizations about fair housing law with respect to lending practices by expanding local knowledge</p>	<p>Work with service provider(s) to sponsor targeted workshops and training services to specific populations, which may include County staff members, landlords, realtors, design professionals, grant sub-recipients and the general public.</p>	<p>Number of workshops provided.</p> <p>Number of participants trained.</p> <p>Number of complaints filed.</p>	<p>Annually</p> <p>2019</p> <p>2019</p>

<p>of fair housing rights, requirements and responsibilities.</p>	<p>Support housing counseling services and financial education sessions in Rockland County on a regular basis.</p> <p>Hold at least one County meeting annually to discuss issues related to fair housing, including education efforts and outreach.</p> <p>Work with service provider(s) to provide education to tenants regarding the availability of programs, their rules and procedures for obtaining information and filing complaints.</p>		
<p>Impediment #7: Loss of Subsidized and Affordable Housing Stock</p>			
<p>Continue to support affordable housing production in all areas of the County (see Impediment #2).</p> <p>Consider alternative strategies to maintain current levels of affordability in projects converting to market rate.</p> <p>Increase tenant education regarding their rights under existing rent regulation programs by expanding local knowledge of fair housing rights, requirements and responsibilities (see Impediment #6)</p>	<p>See Impediment #2: Lack of Land Available and Suitable for Housing Development.</p> <p>Work with service provider(s) to contact building owners regarding information on alternative funding sources.</p> <p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #2: Lack of Land Available and Suitable for Housing Development.</p> <p>Programs funded, as reported in CAPER.</p> <p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #2</p> <p>Annually</p> <p>See Impediment #6</p>
<p>Impediment #8: Overall Discrimination in the Housing Market</p>			
<p>Increase fair housing choice for low and moderate income households, particularly in the County's non-impacted areas and areas in need of reinvestment.</p>	<p>Identify suitable properties in non-impacted areas and areas in need of reinvestment and collaborate with affordable housing developers.</p>	<p>Programs funded and successful projects in non-impacted block groups.</p> <p>Programs funded and successful projects in</p>	<p>Annually</p> <p>Annually</p>

<p>Increase fair housing choice for the disabled by expanding the number of affordable accessible units available (see Impediment #4).</p>	<p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>areas in need of reinvestment. See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>See Impediment #4</p>
<p>Increase fair housing choice for large families and families with children by expanding opportunities for these households (see Impediment #4).</p>	<p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>See Impediment #4</p>
<p>Increase fair housing choice for seniors by continuing to provide housing opportunities to seniors (see Impediment #4).</p>	<p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>See Impediment #4: Lack of Affordable Housing to Serve Protected Classes.</p>	<p>See Impediment #4</p>
<p>Work to reduce local opposition to affordable housing when it occurs.</p>	<p>Hold community-wide housing forums when significant opposition to affordable housing occurs.</p>	<p>Number of forums held and number of participants.</p>	<p>Annually</p>
<p>Establish funding and economic development policies that will promote fair housing choice throughout the County via the creation of new affordable housing units.</p>	<p>Applicants and developers receiving Federal funds administered by the County for housing purposes must give priority emphasis to the locations of greatest need within Rockland County: 1) Areas in which affordable housing options are underrepresented. 2) Areas which have experienced significant vacancy, abandonment or disinvestment.</p>	<p>Priority areas identified by the County, in conjunction with jurisdictions. New guidelines released by the County establishing requirements for applicants and developers receiving Federal funds. Number of new housing units in these areas.</p>	<p>2016 2017 2019</p>

Impediment #9: Discriminatory Lending Policies and Practices

<p>Reduce housing lending discrimination in Rockland County by expanding local knowledge of fair housing rights, requirements and</p>	<p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #6</p>
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<p>responsibilities (see Impediment #6).</p> <p>Educate households and housing-related organizations about fair housing laws with respect to lending practices by expanding local knowledge of fair housing rights, requirements and responsibilities (see Impediment #6).</p>	<p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #6: Inadequate Knowledge of Fair Housing Rights and Requirements.</p>	<p>See Impediment #6</p>
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APPENDICES

APPENDIX A: CHART OF STAKEHOLDERS CONSULTED

APPENDIX B: ZONING ANALYSIS

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APPENDIX A

CHART OF STAKEHOLDERS CONSULTED



Agencies, groups, organizations who participated (Table 2 in *The Process* section of the Consolidated Plan)

1	Agency/Group/Organization	Rockland County - Department of Social Services
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Tony Petriccione, Director of the DSS Housing Unit, attended the May 18, 2015 Stakeholder Meeting.
2	Agency/Group/Organization	Village of Nyack Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Toni Keys, Manager of the Village of Nyack Housing Authority and Lucia martin attended the May 18, 2015 Stakeholder meeting. VNHA also filled out and returned a questionnaire.
3	Agency/Group/Organization	Town of Stony Point
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Town Supervisor, Geoffrey Finn, returned a questionnaire.

4	Agency/Group/Organization	Rockland County - Department of Mental Health
	Agency/Group/Organization Type	Services-homeless Services-Health Services - Victims Health Agency Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Jennifer Clark attended the May 21, 2015 Stakeholder Meeting.
5	Agency/Group/Organization	JOSEPH'S HOME INC. (LOEB HOUSE)
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Ingrid Watzka and Tom Zimmerman attended the May 21, 2015 Stakeholder Meeting.
6	Agency/Group/Organization	ROCKLAND HOUSING ACTION COALITION
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Gerri Levy attended the May 21, 2015 Stakeholder Meeting.

7	Agency/Group/Organization	VILLAGE OF SPRING VALLEY
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless Service-Fair Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Matthew Jones attended the May 21, 2015 Stakeholder Meeting on behalf of the Village of Spring Valley.
8	Agency/Group/Organization	JEWISH FAMILY SERVICES OF ROCKLAND INC
	Agency/Group/Organization Type	Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Doris Zuckerberg completed a service provider questionnaire on behalf of Jewish Family Services of Rockland, Inc.
9	Agency/Group/Organization	VILLAGE OF SLOATSBURG
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Mayor Carl S. Wright completed a questionnaire.
10	Agency/Group/Organization	Center for Safety & Change
	Agency/Group/Organization Type	Housing Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Venesia Defrank and Dilcia Suazo completed and returned a service provider questionnaire.

11	Agency/Group/Organization	CHIKU AWALI
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Alexandraeena Dixon completed a service provider questionnaire.
12	Agency/Group/Organization	Village of Kaser
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Binyomin Mermelstein returned a service provider questionnaire.
14	Agency/Group/Organization	Spring Valley Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Keith H. Burrell, Executive Director, returned a service provider questionnaire.



APPENDIX B

ZONING ANALYSIS



Rockland County Zoning Analysis

TOWN OF CLARKSTOWN**Zoning Districts**

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-160	Yes	No	No	N/A
R-80	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-22	Yes	No	Special Permit	Senior housing only
R-15	Yes	No	No	N/A
R-10	Yes	As of Right	No	N/A
RG-1	Yes	As of Right	As of Right/ Special Permit	Condominium-type garden apartments/ senior housing; rental-type garden apartments and cooperative garden apartments
RG-2	Yes	As of Right	As of Right/ Special Permit	Condominium-type garden apartments; rental-type garden apartments; cooperative garden apartments / senior housing
LO	No	No	No	N/A
PO	Yes	No	Special Permit	Senior housing
LS	No	No	No	N/A
CS	Yes	No	Special Permit	Senior Housing
RS	No	No	No	N/A
MRS	No	No	No	N/A
LIO	No	No	No	N/A
M	No	No	No	N/A
PED	No	No	No	N/A
MF-1, MF-2 MF-3	Yes	As of Right	As of Right/ Special Permit	Dwelling units of all types of design and forms of ownership except single family detached residences / senior housing
CO	No	No	No	N/A
COS	No	No	No	N/A

Source: Town of Clarkstown Town Code, Chapter 290: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

TOWN OF CLARKSTOWN

Multifamily Zoning Districts

Zoning District	Building Height (inches per foot of distance from lot line)	Maximum FAR	Minimum Lot Area (square feet)
R-22	10	0.2	35,000
RG-1 & RG-2 (Special Permit)	8	0.2	80,000
RG-1 & RG-2 (Garden Apartments)	9	0.5	40,000
PO	8	0.2	80,000
CS	8	0.2	80,000
MF-1, MF-2 & MF-3	Unknown	Unknown	Unknown

Source: Town of Clarkstown Town Code, Chapter 290: Zoning, retrieved from eCode 360 on May 22, 2015.

VILLAGE OF UPPER NYACK**Zoning Districts**

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	No	No	N/A
R-2	Yes	No	No	N/A
R-3	Yes	No	No	N/A
R-4	Yes	No	No	N/A
R-5	Yes	No	No	N/A
MB	No	No	No	N/A
VC	No	No	No	N/A
OB	Yes	No	No	N/A
LO	No	No	No	N/A

Source: Village of Upper Nyack Zoning Code, retrieved from <http://uppernyack-ny.us/doc-type/village-code/> on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts: There are no zoning districts that allow multifamily residential use in the Village of Upper Nyack. An application for a Special Permit for the conversion of buildings constructed prior to the effective date of the Zoning Ordinance into a multiple dwelling can be submitted to the Planning Board. The maximum number of dwelling units allowed in a building converted to a multiple dwelling unit is determined by dividing the total lot area by the minimum lot area for residential occupancy in the applicable district.

TOWN OF HAVERSTRAW

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-120	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-25	Yes	No	No	N/A
R-15	Yes	NO	No	N/A
RG	Yes	As of Right	As of Right	
RMH	Yes	No	No	N/A
CR	No	No	No	N/A
PO	No	No	No	N/A
C	No	No	No	N/A
PIO	No	No	No	N/A
WRD	Yes	No	Special Permit	Subject to Article V, must be approved by Town Board

Source: Town of Haverstraw Town Code, Chapter 167: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (stories)	Minimum Coverage		Maximum Density (Per Acre)	Minimum Lot Area (square feet)
		Usable Open Space	Dwelling Unit Size (sf)		
General Residence (RG)	8 stories	N/A	N/A	6 units	5 acres
Waterfront Recreation Development (WRD)	8 stories	N/A	N/A	6 units	25 acres

Source: Town of Haverstraw Town Code, Chapter 167: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes allow accessory apartments; for the purpose of this study, a single family home with an accessory apartment is not considered a two family residence.

VILLAGE OF HAVERSTRAW

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	No	No	N/A
R-1C	Yes	No	No	N/A
R-1T	Yes	No	No	N/A
R-2	Yes	As of Right	No	N/A
R-3	Yes	As of Right	Special Permit	
PRD	Yes	No	Special Permit	Multifamily residences for condominium or cooperative ownership
HB	Yes	No	Special Permit	For persons 55+ of age with assisted living available
CBD	Yes	Yes	Special Permit	Permits residential use above commercial spaces
PO	No	No	No	N/A
SP	No	No	No	N/A
PI	No	No	No	N/A
WD	Yes	No	Special Permit	Multiple dwellings in accordance with standards of PRD District
MPO	Depends	Depends	Depends	Uses are subject to applicable use regs. of the districts of subject parcels

Source: Village of Haverstraw Village Code, Chapter 245: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet/stories)	Maximum Development Coverage	Minimum Unit Size (Square Feet)
Third Residence (R-3)	2.5 / 35'	50%	Efficiency: 1,500 1 BR: 2,000 2 BR: 2,500 3 BR: 3,000
Planned Residential Development (PRD)	8 / 96'	50%	Efficiency: 1,500 1 BR: 2,000 2 BR: 2,500 3 BR: 3,000
Highway Business (HB)	2.5 / 35'	60%	None
Central Business District (CBD)	2.5 / 35'	60%	None

Source: Village of Haverstraw Village Code, Chapter 245: Zoning, retrieved from eCode 360 on May 22, 2015

VILLAGE OF POMONA

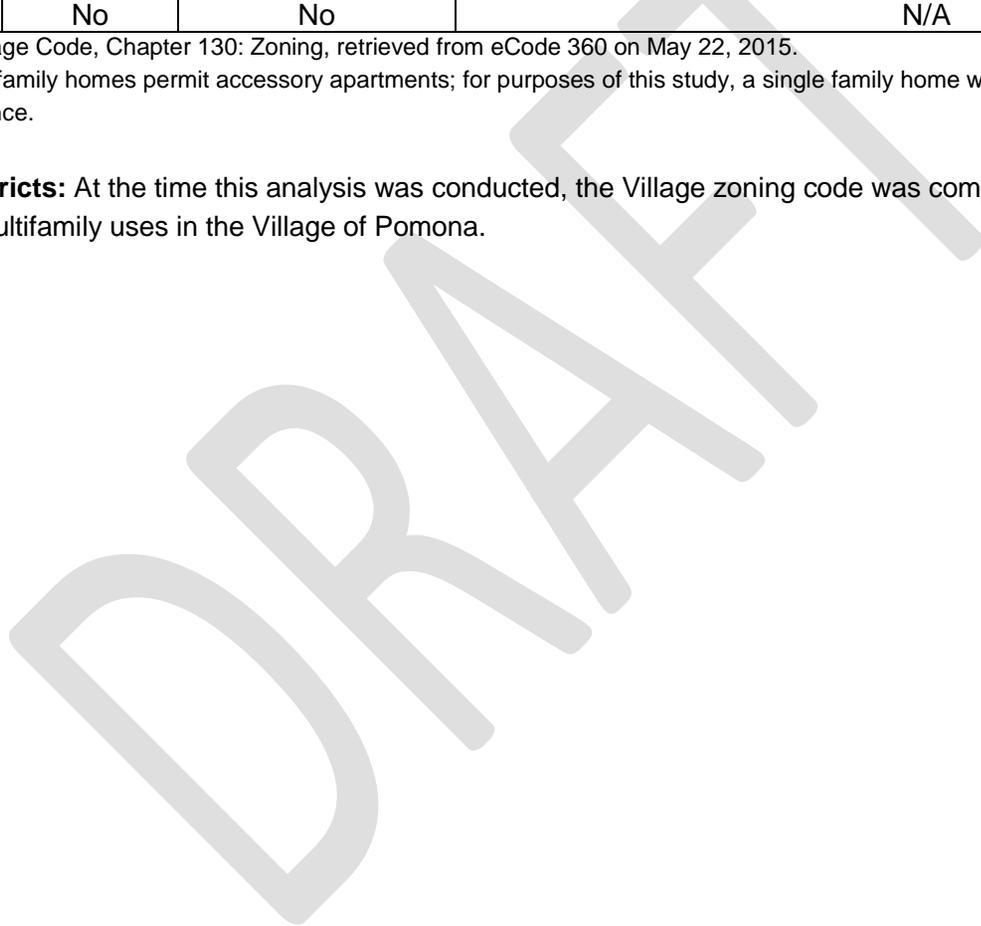
Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-40	Yes	No	No	N/A

Source: Village of Pomona Village Code, Chapter 130: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts: At the time this analysis was conducted, the Village zoning code was comprised of a single zoning district, which does not permit multifamily uses in the Village of Pomona.



VILLAGE OF WEST HAVERSTRAW

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	No	No	N/A
R-2	Yes	No	No	N/A
R-3	Yes	Yes	No	N/A
R-4	Yes	Yes	No	N/A
C	Yes	Yes	No	N/A
PLI	No	No	No	N/A

Source: Village of West Haverstraw Village Code: Chapter 250, Zoning, Planning and Building, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts: There are currently no zoning districts in the Village of West Haverstraw that permit multifamily residential use, either as of right or via a Special Permit.

TOWN OF ORANGETOWN

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R80	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-22	Yes	No	No	N/A
R-15	Yes	No	No	N/A
RG	Yes	Special Permit	Special Permit	Senior housing permitted only on Town-owned land
MFR	Yes	As of Right/ Special Permit	As of Right/ Special Permit	Allows DU of all types except single family and 2-family detached/ Senior housing permitted only on Town-owned land
CS	Yes	No	Special Permit	Senior housing permitted only on Town-owned land
CC	Yes	No	Special Permit	Senior housing permitted only on Town-owned land
LI	Yes	No	Special Permit	Mixed use development and mixed use expansions
LO	No	No	No	N/A
OP	No	No	No	N/A
LIO	No	No	No	N/A
CO	Yes	No	Special Permit	Senior housing permitted only on Town-owned land
RPC-R	No	No	No	N/A

Source: Town of Orangetown Town Code, Chapter 43: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (Per foot of distance from lot line)	Maximum Coverage		Maximum FAR	Minimum Lot Area (square feet)
		Maximum Land Coverage	Dwelling Units Per Acre		
Senior Housing on Town Land (RG, MFR, CS, CC, CO)	1'	65%	30	45%	1 acre
Mixed Use Development (MFR and LI)-	4 stories / 50'	70%	N/A	0.4	10 acres
	4 stories / 50'	70%	N/A	0.4	10 acres

Source: Town of Orangetown Town Code, Chapter 43: Zoning, retrieved from eCode 360 on May 22, 2015.

VILLAGE OF NYACK

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
SFR-1	Yes	No	No	N/A
SFR-2	Yes	No	No	N/A
TFR	Yes	Yes	No	N/A
MFR-1	Yes	As of Right	As of Right	
MFR-2	Yes	As of Right	As of Right	
MFR-3	Yes	As of Right	As of Right	
DMU	Yes	No	As of Right	
RMU	Yes	As of Right	As of Right	
RO	Yes	Yes	As of Right	Permits a maximum of three-family units
CC	No	No	No	N/A
WF	Yes	No	Special Permit	Permits development of 3+ units
M	No	No	No	N/A
H	No	No	No	N/A

Source: Village of Nyack Town Code, Chapter 360: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet/stories))	Minimum Coverage		Maximum FAR	Minimum Lot Area (square feet)
		Usable Open Space	Dwelling Unit Size (sf)		
MFR-1	3 / 40	360	600	----	20,000
MFR-2	4 / 50	100	600	----	20,000
MFR-3	8 / 85	100	600	----	40,000
DMU	3 / 40	----	600	2.0	N/A
RMU	2 / 32	----	600	0.75	7,500
RO / OMU	2 / 35	----	600	0.5	7,500
WF	-- / 35	----	600	0.65	----

Source: Village of Nyack Town Code, Chapter 360: Zoning, retrieved from eCode 360 on May 22, 2015.

Note: Residence districts listed in the zoning regulations do not match the zoning districts listed in the bulk regulations; the data included in these tables are from the Town's bulk regulations charts.

VILLAGE OF SOUTH NYACK

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-4A	Yes	No	No	N/A
R-18	Yes	No	No	N/A
R-12	Yes	No	No	N/A
R-12HC	Yes	No	No	N/A
R-12H	Yes	No	No	N/A
RG-8H	Yes	As of Right	No	N/A
RG-6	Yes	As of Right	No	N/A
RG-4	Yes	As of Right	No	N/A
HRA	Yes	Applies to existing 4 six story buildings only (as of 1995)		
RG-A	Yes	As of Right	As of Right	Applies to existing 3 story buildings only (as of 1995)
R-O	Yes	As of Right	No	N/A
RG-OA	Yes	As of Right	No	N/A
B-1	No	No	No	N/A

Source: Village of South Nyack Zoning Code, retrieved from <http://southnyack.ny.gov/doc-type/village-code/> on May 27, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Description
High-Rise Apartments (HRA)	This zone applies only to existing high rise buildings in the designated area, and stipulates that any changes to existing area and bulk utilization requires a variance.

Source: Village of South Nyack Zoning Code, retrieved from <http://southnyack.ny.gov/doc-type/village-code/> on May 27, 2015.

VILLAGE OF PIERMONT

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-40	Yes	No	No	N/A
R-20	Yes	No	No	N/A
R-15	Yes	No	No	N/A
R-10	Yes	No	No	N/A
R-7.5	Yes	No	No	N/A
R-1.25	Yes	No	No	N/A
RM	Yes	Special Permit	Special Permit	Permits garden apartments and condominiums.
BB	Yes	No	No	N/A
BA	No	No	No	N/A
WF-1	Yes	No	No	N/A
WF-2	Yes	Special Permit	No	N/A

Source: Village of Piermont Village Code, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (stories/feet)	Maximum FAR	Minimum Lot Area (acres/ square feet)
Multifamily Residential (RM)	3 / 35'	30%	1 acre (3,000 per DU)

Source: Village of Piermont Village Code, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

TOWN OF RAMAPO**Zoning Districts**

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
RR-160	Yes	No	No	N/A
RR-80	Yes	No	No	N/A
RR-50	Yes	No	No	N/A
R-40/R-40A	Yes	No	No	N/A
R-35	Yes	No	No	N/A
R-25	Yes	No	No	N/A
R-15/R-15A	Yes	As of Right	No	N/A
R-15C	Yes	As of Right	As of Right	Permits 3-family residences (conversion or new)
RSH	Yes	No	Special Permit	Active senior citizen housing development
R15-MR	Yes	Special Permit	No	N/A
MR-16	Yes	No	As of Right	Permits multifamily use including garden apartments & townhouses
MR-12	Yes	No	As of Right	Permits multifamily use including garden apartments & townhouses
MR-8	Yes	No	As of Right	Permits multifamily use including garden apartments & townhouses
MU-1	Yes	No	As of Right	Permits multifamily use including garden apartments & townhouses
MU-2	Yes	No	As of Right	Permits multifamily use including garden apartments & townhouses
NS	No	No	No	N/A
CS	No	No	No	N/A
PO	No	No	No	N/A
LO	No	No	No	N/A
PI	No	No	No	N/A

Source: Town of Ramapo Town Code, Chapter 76: Zoning, retrieved from eCode 360 on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet)	Maximum Coverage	Minimum Lot Area (square feet or acres)
R-15C (detached)	35'	50%	15,000
R-15C (semiattached)	35'	55%	10,000 sf
RSH	40'	65%	Townhouse: 2,500 sf Semiattached: 5,000 sf Detached: 10,000 sf
MR-16	40'	65%	4 acres
MR-12	40'	65%	4 acres
MR-8	40'	65%	4 acres
MU-1	35'	50%	20,000 sf
MU-2	35'	65%	10 acres

Source: Town of Ramapo Town Code, Chapter 76: Zoning, retrieved from eCode 360 on May 26, 2015.

VILLAGE OF CHESTNUT RIDGE

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
RR-50	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-35	Yes	No	No	N/A
R-25	Yes	No	No	N/A
R-15	Yes	No	No	N/A
RSH	Yes	No	Special Permit	
NS	No	No	No	N/A
PO	No	No	No	N/A
PO-\$	No	No	No	N/A
LO	No	No	No	N/A
PI	No	No	No	N/A

Source: Village of Chestnut Ridge Village Law, retrieved from <http://www.chestnutridgevillage.org/Zoning%20Law/Zoning%20Law.htm> on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet)	Maximum Coverage Overall / Building	Minimum Lot Area (square feet or acres)	Floor Area Ratio (FAR)
RSH	35' / 2 stories	40% / 20%	1 acre per 20 units	N/A

Source: Village of Chestnut Ridge Village Law, retrieved from <http://www.chestnutridgevillage.org/Zoning%20Law/Zoning%20Law.htm> on May 26, 2015.

VILLAGE OF AIRMONT

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
RR-50	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-35	Yes	No	No	N/A
R-25	Yes	No	No	N/A
R-15	Yes	No	No	N/A
RSH	Yes	No	**	Housing for senior citizens and physically handicapped
NS	No	No	No	N/A
VC	No	No	No	N/A
PO	No	No	No	N/A
LO	No	No	No	N/A
PI	No	No	No	N/A

Source: Village of Airmont, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

**It is not clear whether the development of housing for senior citizens and the physically handicapped is as of right or requires a special permit.

Multifamily Zoning Districts

Zoning District	Building Height (feet)	Maximum Coverage	Minimum Lot Area (square feet or acres)	Floor Area Ratio (FAR)
RSH	Depends on Previous Zone	60%	4 acres	0.4

Source: Village of Airmont, Chapter 210: Zoning, retrieved from eCode 360 on May 26, 2015.

VILLAGE OF HILLBURN**Zoning Districts**

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-60	Yes	No	No	N/A
R-9	Yes	No	No	N/A
R-6	Yes	Special Permit	No	N/A
LS	Yes	Yes**	No	N/A
HC	No	No	No	N/A
LI	No	No	No	N/A

Source: Village Code, Chapter 250: Zoning, retrieved from the Village of Hillburn on June 3, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

** Permits any use permitted in an abutting residence district, provided that all requirements of the most restrictive abutting residence are met.

Multifamily Zoning Districts: There are currently no zoning districts in the Village of Hillburn that permit multifamily residential use, either as of right or via a Special Permit.

VILLAGE OF SLOATSBURG

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
OSR	No	No	No	N/A
R-80	Yes	No	No	N/A
R-40	Yes	No	No	N/A
R-15	Yes	No	No	N/A
R-10	Yes	As of Right	No	N/A
MU-1	Yes	As of Right	Special Permit	Permits up to 4 multifamily dwelling units in new structures with a minimum habitable area of 900 square feet for each unit
MU-2	Yes	As of Right	Special Permit	Permits up to 4 multifamily dwelling units in new structures with a minimum habitable area of 900 square feet for each unit
VC-1	Yes	As of Right	Special Permit	Permits mixed residential and nonresidential uses, with each dwelling unit containing a minimum habitable area of 900 square feet
VC-2	Yes	No	As of Right	Permits multifamily residential uses for active adults (55+) with up to 30 owner occupied dwelling units as part of a condominium project
O	No	No	No	N/A
IP	No	No	No	N/A
LRR	Yes	No	No	N/A

Source: Village of Sloatsburg, Chapter 54: Zoning, retrieved from <http://www.sloatsburgny.com/CompZoningRevZ1.6.pdf> on May 29, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (stories / feet)	Maximum Coverage	Minimum Lot Area (square feet)	Floor Area Ratio (FAR)
MU-1	2.5 / 35'	35%	10,000	0.3
MU-2	2.5 / 35'	35%	10,000	0.3
VC-1	2.5 / 35'	50%	5,000	0.5
VC-2	3 / 35'	70%	20,000*	---

Source: Village of Sloatsburg, Chapter 54: Zoning, retrieved from <http://www.sloatsburgny.com/CompZoningRevZ1.6.pdf> on May 29, 2015.

*A minimum of 10 gross acres is required for development in the VC-2 District.

VILLAGE OF MONTEBELLO

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
ER-80	Yes	No	No	N/A
RR-50	Yes	No	No	N/A
R-35	Yes	No	No	N/A
R-25	Yes	No	No	N/A
R-15	Yes	Special Permit	No	N/A
RSH	Yes	No	Special Permit	Housing for senior citizens and physically handicapped
R-AH	Yes	No	Special Permit	Affordable housing development for moderate income persons
R59-DD	Special Permit	Special Permit	Special Permit	Permitted use depends; may be developed according to NS, LO-C, R-AH or R25 districts or mix thereof, with consultation from the Planning Board and approval from the Village Board.
NS	No	No	No	N/A
PO	No	No	No	N/A
LO	No	No	No	N/A
LO-C	No	No	No	N/A
PI	No	No	No	N/A
PI-C	No	No	No	N/A

Source: Village of Montebello Village Code, Chapter 195: Zoning, retrieved from eCode 360 on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet)	Maximum Coverage	Minimum Lot Area (square feet or acres)	Floor Area Ratio (FAR)
Residential Senior Citizen (RSH)	20'	40%	4 acres	0.3
Affordable Housing Development (R-AH)	25'	80%	1,125 sf	1.8
Route 59 Development (R59-DD)	Depends on underlying district(s)/Village consultation, may be developed with multifamily uses with R-AH.			

Source: Village of Montebello Village Code, Chapter 195: Zoning, retrieved from eCode 360 on May 26, 2015.

VILLAGE OF WESLEY HILLS

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-50	Yes	No	No	N/A
R-35	Yes	No	No	N/A
R-20	Yes	No	No	N/A
R-20	Yes	No	No	N/A
R-15	Yes	No	No	N/A
NS	Yes	No	No	N/A

Source: Village of Wesley Hills Village Code, Chapter 230: Zoning, retrieved from eCode 360 on May 26, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts: There are currently no zoning districts in the Village of Wesley Hills that permit multifamily residential use, either as of right or via a special permit.

VILLAGE OF KASER

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	No	No	N/A
R-2	Yes	As of Right	As of Right	Permits three, four and five family semi attached and detached uses
PD	Yes	As of Right	As of Right/ Special Permit	Permits three, four and five family semi attached and detached uses Permits multiple dwellings (6+ units) by special permit

Source: Zoning Local Law for the Village of Kaser, retrieved from the Village of Kaser on May 28, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (feet)	Maximum Coverage	Minimum Lot Area (square feet)	Floor Area Ratio (FAR)
Residence District (R-2) and Planned Development (PD): Three Family detached Three family semi detached Four and five family detached	35'	55%	10,000	98
Planned Development (PD): Multiple Dwellings	35'	55%	40,000	95

Source: Zoning Local Law for the Village of Kaser, retrieved from the Village of Kaser on May 28, 2015.

VILLAGE OF SPRING VALLEY

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	No	No	N/A
R-1A	Yes	No	No	N/A
R-2	Yes	As of Right	No	N/A
R-3	Yes	As of Right	As of Right	
R-4	Yes	As of Right	As of Right	
RSH	Yes	As of Right	Special Permit	Permits government-assisted multifamily uses by special permit
PRD	Yes	As of Right	Special Permit	
POR	Yes	No	No	N/A
PO	Special Permit	---	---	Village Board may permit mixed uses in this district, as specified in the NB and GB districts
NB	No	No	No	N/A
GB	Yes	No	Special Permit	Village Board may permit mixed uses in this district, as specified in the HB and R-3 districts
HB	Special Permit	---	---	Village Board may permit mixed uses in this district, as specified in the PLI district
PLI	Special Permit	---	---	Village Board may permit mixed uses in this district, as specified in the GB and HB districts.
FPO	Special Permit	Special Permit	Special Permit	Floodplain Overlay District, has no uses permitted by right; permits all principal uses allowed by underlying zone.
R-5	Yes	Yes	Yes	Subject to Subsection E(2)

Source: Village of Spring Valley Village Code, Chapter 255: Zoning, Appendix A: Table of General Use Requirements and Appendix B: Table of General Bulk Requirements, retrieved from eCode 360 on May 28, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts

Zoning District	Building Height (stories/feet)	Minimum Lot Area (square feet or acres)	Floor Area Ratio (FAR)
Medium-High-Density Residential (R-3)	3 / 40'	40,000 sf	0.6
High-Density Residential (R-4)	8 / 80'	20,000	1.0
Specialized Housing Residential (RSH)	3 / 40'	40,000	0.6
Planned Residential Development Overlay (PRD)	3 / 40'	20,000	0.6
Professional Office (PO)	Not specified	20,000	Not specified
General Business (GB)	3 / 40'	20,000	0.6
Highway Business (HB)	Not specified	20,000	Not specified
Low-Rise High-Density Residential (R-5)	3 / 40'	40,000	0.75

Source: Village of Spring Valley Village Code, Chapter 255: Zoning, Appendix A: Table of General Use Requirements and Appendix B: Table of General Bulk Requirements, retrieved from eCode 360 on May 28, 2015.

VILLAGE OF NEW HEMPSTEAD

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
IR-50	Yes	No	No	N/A
IR-40	Yes	No	No	N/A
IR-35	Yes	No	No	N/A
IR-25	Yes	No	No	N/A
2R-15	Yes	As of Right	No	N/A
LO	No	No	No	N/A

Source: Village of New Hempstead Local Law #11: A Local Law Regulating and Restricting the Location, Construction and Use of Buildings and Structures and the Use of Land in the Village of New Hempstead, County of Rockland, State of New York, retrieved from the Village of New Hempstead on June 3, 2015

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

Multifamily Zoning Districts: There are currently no zoning districts in the Village of New Hempstead that permit multifamily residential use, either as of right or via a special permit.

VILLAGE OF NEW SQUARE

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
R-1	Yes	Yes	No	N/A
R-2	Yes	Yes	As of Right**	N/A
C-1	No	No	No	N/A
C-2	Yes	Yes	As of Right**	N/A

Source: Village of New Square Local Law No. 1: A Local Law Regulating and Restricting the Construction and Use of Buildings and the Use of Land in the Village of New Square, retrieved from the Village of New Square in 2006.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

**Permits multifamily use, which is not defined in the zoning ordinance.

Multifamily Zoning Districts

Zoning District	Building Height (stories/feet)	Minimum Lot Area (square feet or acres)	Floor Area Ratio (FAR)
One Family, Two Family, Multifamily Residential (R-2)	Not Specified'	8,000 sf	Not Specified
Central Business (C-2)	Not Specified'	8,000 sf	Not Specified

Source: Village of New Square Local Law No. 1: A Local Law Regulating and Restricting the Construction and Use of Buildings and the Use of Land in the Village of New Square, retrieved from the Village of New Square in 2006.

TOWN OF STONY POINT

Zoning Districts

Zoning District	Allows Residential Use?	Two Family*	Multifamily (3 or More DU)	
			Permitted	Comments
MHC	Yes	No	No	N/A
APRP	Yes	No	No	N/A
SR-R	Yes	No	No	N/A
RR	Yes	No	No	N/A
R-1	Yes	Conditional Use	No	N/A
SRC	Yes	Special Permit	Special Permit	Only for senior citizen housing
RW	Yes	As-of-right	No	N/A
BU	No	No	No	N/A
O	No	No	No	N/A
LI	No	No	No	N/A
LI-2	No	No	No	N/A
SR	Yes	No	No	N/A
PW*	No	No	No	N/A

Source: Town of Stony Brook Town Code, Chapter 215: Zoning, retrieved from eCode 360 on May 22, 2015.

*Some districts allowing single family homes permit accessory apartments; for purposes of this study, a single family home with an accessory apartment is not considered a two family residence.

*The Town is currently undergoing revisions to allow the development of mixed use multifamily buildings in this zone.

Multifamily Zoning Districts

Zoning District	Building Height (feet/stories)	Maximum Coverage		Maximum FAR	Minimum Lot Area
		All Buildings	Impervious		
SRC	35 / 2	300 sf open space per unit		20 units per acre	N/A

Source: Town of Stony Brook Town Code, Chapter 215: Zoning, retrieved from eCode 360 on May 22, 201



APPENDIX C

**ADMINISTRATIVE POLICIES AND PROCEDURES,
INCLUDING AFFIRMATIVE MARKETING POLICIES
AND PROCEDURES**



Administrative Policy and Procedures
HOME Investment Partnership Program
Housing Opportunities for Persons with AIDS
American Recovery and Reinvestment Act – Homeless Prevention and Rapid Re-Housing Program

The information included is the policy and procedures of the Rockland County Office of Community Development for the United States Department of Housing and Urban Development’s HOME Investment Partnership, HOPWA, and Homeless Prevention and Rapid Re-Housing Programs. The policies and procedures have been established for all programs unless stated and are in accordance with federal regulations, Title 24 – Housing and Urban Development, Part 92 – HOME Investment Partnerships Program, Part 574 Housing Opportunities for Persons with AIDS and the American Recovery and Reinvestment Act of 2009.

GENERAL PROVISIONS (ALL PROGRAMS)

AFFIRMATIVE MARKETING POLICIES AND PROCEDURES

In accordance with Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) Program regulations and in furtherance of the County of Rockland’s commitment to non-discrimination and equal opportunity in housing, the County of Rockland has established procedures to affirmatively market units acquired, rehabilitated, constructed or otherwise assisted under the CDBG and/or HOME Programs.

The County of Rockland is committed to the goals of non-discrimination and equal access. In addition, the County of Rockland is committed to the goals of increasing the housing opportunities of those with limited English proficiency, low-income residents and under-represented ethnic and racial groups. These goals will be reached through the implementation of the County’s Affirmative Marketing Policy. The implementation of this policy should result in a diverse tenant population in each of the affordable housing developments, with a representation of ethnic and racial groups that is consistent with their representation in the County.

The County of Rockland actively promotes fair housing through:

- Ongoing funding of fair housing services
- Adoption and implementation of an “Analysis of Impediments to Fair Housing Choice”
- Adoption of “Consolidated Plan” for CDBG, HOME program, with an analysis and strategy for fair housing, every five years

- Annual monitoring of fair housing activities through monitoring of fair housing services and reporting on ongoing activities in its Consolidated Annual Performance and Evaluation Report (CAPER)

The goal of the affirmative marketing procedures and outreach efforts are to ensure that all persons – regardless of their race, color, national origin, age, religion, sex, disability, familial status or English proficiency – are aware of the affordable housing opportunities generated by federal HOME funds and County Housing Funds and program activities, in accordance with 24 CFR 108.1.

The County of Rockland is responsible for the implementation of the Affirmative Marketing Policies and Procedures and all owners, developers, Community Housing Development Organizations and other nonprofits must comply with this policy for all CDBG, HOME and County funded housing developments.

The Affirmative Marketing Policies and Procedures exist as an appendix to the “Analysis of Impediments to Fair Housing Choice” maintained in the Community Development Department files. CDBG, HOME and County funded housing developments are held to the terms of the policies by reference of these policies as an attachment to loan or rent regulatory agreements with the County for receipt of CDBG, HOME and/or County funds.

1. Methods for Informing the Public, Owners and Potential Tenants about Fair Housing Laws and the County’s Affirmative Marketing Policies and Procedures
 - a) The County of Rockland Office of Community Development shall be responsible for implementing the County’s Affirmative Marketing Policies and Procedures.
 - b) Recipients of CDBG, HOME and/or County funds shall be informed of the County’s Affirmative Marketing Policies by having this policy referenced in the agreement as an attachment with the County for the receipt of funds and by making compliance with this policy a requirement for the duration of the agreement.
 - c) The County shall continue to fund outside agencies to provide fair housing information/referral and case investigation services and tenant/landlord information/referral and mediation services.
 - d) The County collaborates with the members of the countywide consortium to reduce discrimination in housing.
 - e) The County shall work with Human Rights Commission to develop an outreach plan each year, which will include advertisements in local

newspapers, public service announcements, distribution of fair housing brochures at relevant events, community presentations, and other outreach activities to inform the community about fair housing rights and responsibilities.

- f) The County shall carry out outreach and provide tenants and rental property owners with copies of the State of New York handbook on tenants rights and responsibilities, fair housing brochures as well as the County's Housing website and Affirmative Marketing Policies and Procedures.
- g) The County provides information about fair housing, fair housing procedures and links on the County's website.
- h) The County shall require that owners of CDBG and/or HOME funded housing provide an annual report describing how their actions have complied with the County's Affirmative Marketing Policies and Procedures.
- i) The County shall periodically post flyers and brochures that describe fair housing laws and services, in the County Office building, which is open to the public.
- j) Housing project owners shall instruct all employees and agents in writing and orally in the policy of nondiscrimination and fair housing.

2. Description of Requirements of Property Owners and the County to Affirmatively Market Housing Assisted with CDBG, HOME and/or County funds

It is the County of Rockland's policy to require that each owner of a rental or ownership project carried out with CDBG, HOME, and/or County funds:

- a) Use the "Equal Opportunity" logotype or slogan on all correspondence and advertising prepared relating to the rental of units.
- b) Place ads in a local Countywide newspaper of general circulation, e.g. the Rockland Journal News and Rockland County Times, to advertise housing opportunities.
- c) *Sales/Leasing Staff*; Maintain a nondiscriminatory hiring policy in recruiting from both minority and majority groups including both sexes and the handicapped, for staff engaged in the sale or rental of properties.

- d) *Advertising*; All advertising depicting persons shall depict persons of majority and minority groups including both sexes.
- e) *Fair Housing Poster*; Prominently display in all offices in which sale or rental activity pertaining to the project or subdivision takes place using the HUD-approved Fair Housing poster.
- f) *Sign on project site*; Post in a conspicuous position on the project site a sign displaying prominently either the Equal Housing Opportunity logo, slogan, or statement.
- g) *AFHM Plan*; Project owners should submit the AFHM Plan to Office of Community Development for review 120 days prior to initiating sales or rental marketing activities. The County will review and consider approval of the Plan within 30 days.

The County of Rockland shall carry out the following:

- a) Post flyers of upcoming housing opportunities in the consortium community village and town halls.
- b) Maintain and make available to interested parties a listing of the affordable housing stock which includes information about who to contact regarding the availability of housing and the estimated month and year (if known) when applications will be accepted from prospective new tenants.
- c) Monitor, in conjunction with the project monitoring, compliance with the County's Affirmative Marketing Policies and Procedures.

3. Description of What Property Owners and/or the County will do to Inform Persons not Likely to Apply for Housing Without Special Outreach

In order to solicit applications from persons who are not likely to apply for housing without special outreach, particularly those persons with limited English proficiency, each owner of CDBG and/or HOME assisted property, will be required to:

- a) Utilize HUD Form 935.2 to organize and document the affirmative marketing plan for a project.
- b) Target outreach, through a variety of means, to ethnic and racial groups that are underrepresented in the housing development based on their representation in the County.

- c) At a minimum, utilize newspapers, churches, and places of worship, and nonprofit organizations that serve the underrepresented group to distribute information about housing openings.
- d) Provide all advertising in the language the group is most familiar with and provide a contact person who can answer questions in the language primarily spoken by the target group.

The County of Rockland shall carry out the following activities:

- a) As appropriate, the Rockland County Executive's Communications Office will issue a press release to local media to include the Rockland Journal News, The Rockland County Times and News 12.
 - b) Post notice of availability on the County website.
4. Maintenance of Records to Document Actions Taken to Affirmatively Market HOME, CDBNG and/or County Assisted Units and to Assess Marketing Effectiveness.

The County shall request owners of property assisted under CDBG, HOME, and/or County to maintain the following records and report annually on:

- Written description of how vacancies were filled
- Copies of newspaper advertisements and flyers or other printed material used
- Copies of mailing lists to organizations that were sent flyers and other material
- Copies of press releases and description of circulation
- Evidence of broadcast of television and radio advertisements
- Photographs of site signs
- The racial, ethnic and gender characteristics of tenants

The County shall report on compliance with the County's Affirmative Marketing Policies and Procedures and consult with the property owners about any improvements which need to be addressed. The County shall maintain records regarding vacancies that occurred during the year and the process used to fill them.

The County will examine whether or not persons from a variety of racial and ethnic groups in the County applied for or became tenants of units that were affirmatively

marketed. If the County finds that a variety of ethnic groups are represented, the County will assume that the affirmative marketing procedures were effective. If one or more groups are not represented consistent with their representation in the County, the County will review its procedures to determine what changes, if any, might be made to make the affirmative marketing efforts more effective.

5. What Corrective Actions will be Taken Where Affirmative Marketing Requirements are not met.

The County of Rockland will take corrective action if it is determined that a participating property owner had failed to carry out affirmative marketing efforts as required by the County's agreement. The County, prior to taking any corrective action, will discuss with the owner ways to improve affirmative marketing efforts. Initially, the County will provide a reasonable time period for the owner to establish written procedures for future use. If a participant property owner, after receiving notice and an opportunity to correct identified deficiencies, continues to neglect the responsibilities made incumbent by the terms of the agreement, the County will consider action such as notifying the property owner that a breach of the terms of the agreement with the County has occurred and that the County will exercise its rights under the terms of the agreement.

The County notes that federal regulations [24 CFR 108.50 – Compliance Procedures for Affirmative Fair Housing Marketing-Sanctions] state: “Applicants failing to comply with the requirements of these regulations, the AFHM regulations, or an AFHM plan will make themselves liable to sanctions authorized by law, regulations, agreements, rules, or policies governing the program pursuant to which the application was made, including, but not limited to, denial of further participation in Departmental programs and referral to the Department of Justice of suit by the United States for injunctive or other appropriate relief.”

RECAPTURE PROVISION

The County of Rockland has been operating under an approved recapture provision for the Homebuyers Assistance, American Dream Down Payment Initiative, and HOPWA Programs.

Any loans made to homebuyers and not-for-profits to assist in the purchase or modification of existing or newly constructed housing unit is secured by a mortgage on the property. Said mortgage shall adhere to include the following provisions:

1. For the Homebuyers Assistance Program the premises will be their primary residence.
2. That upon sale during the period of affordability, the loan becomes due and payable upon transfer. If the sale is to a non-HOME eligible owner at an "affordable" price, the

full principal is due plus interest at the same rate as the first mortgage. If it is sold to a qualifying person, only the principal is due. The County in these cases reserves the right to "roll over" the loan to the new owner without extending the period of affordability.

3. During the first three years of the loan, repayment shall be the loan amount plus interest equal to the mortgage in the first position or 6%, whichever is greater. In years four and five, outstanding principal only and the loan will reduce annually from years six through fifteen at a rate of 10% of the loan amount with the loan forgiven after fifteen years.

4. If non-owner occupied, the premises will conform to the rental income guidelines established by the United States Department of Housing and Urban Development for Rockland County for a period of fifteen (15) years. If the rents exceed the HUD Fair Market Rent, then the loan is considered in default and repayment must be made immediately. Proof of income is required annually by all residents by submitting all resident's federal income tax returns and a copy of the lease.

5. That upon sale during the period of affordability, the loan becomes due and payable upon transfer. If the property is sold the full balance is due at the time of closing and settlement.

PROGRAM REQUIREMENTS

All housing units assisted with federal funds from the Rockland County Office of Community Development must meet all federal requirements, to include those listed in:

24 CFR 570 – Community Development Block Grants

24 CFR 92 – HOME Investment Partnership Program

24 CFR 982- Section 8 Tenant Based Assistance

24 CFR 574 – Housing Opportunities for Persons with AIDS

24 CFR 8 – Nondiscrimination Based on Handicap in Federally Assisted Programs

24 CFR 58 – Environmental Review Procedures for Recipients Assuming HUD Responsibilities

24 CFR 35 – Lead Based Paint Poisoning Prevention in Federally Owned and Assisted Housing

The American Recovery and Reinvestment Act of 2009

SUBORDINATION

At the discretion of the Rockland County Office of Community Development, the County of Rockland can subordinate the loan in the event the borrower refinances the existing mortgage or mortgages, in an amount not to exceed the mortgages and reasonable closing costs. The borrower must be income and program eligible at the time of the subordination request. The County of Rockland shall not subordinate in any other circumstance, to include debt consolidation.

TENANT ASSISTANCE PROGRAM

The program guideline for the HOME Tenant Assistance Program, HOME 2 Program (HOPWA) and the American Recovery and Reinvestment Act of 2009 are the same as the United States Department of Housing and Urban Development Section 8 Voucher Program. The policies and procedures are available at the Rockland County Office of Community Development and are in accordance with federal and New York State Division of Housing and Community Renewal regulations and administrative plans.

To be eligible for assistance the applicant must be a Rockland County resident for a minimum of one-year and meet all Section 8 Voucher Program enrollment guidelines. The program will require assisted families to pay the total tenant payment as determined in accordance to Section 8 Voucher Program regulations. They must also have no outstanding family obligations, and provide proof that they have applied to and be within one year of assistance of an assisted housing program unit or of sustaining self-sufficiency.

HOME 2 TBA clients must also be eligible under the guidelines as established by the United States Department of Housing and Urban Development for the Housing Opportunities for Persons With Aids (HOPWA) program 24CFR574. A wait list will be developed utilizing guidelines set forth in 24CFR982 and the New York State Division of Housing and Community Renewal Administrative Plan at the time the County of Rockland opens the Section 8 Wait List.

The program also offers the availability of security and utility deposits for families that a residing in subsidized housing units. The maximum assistance is two months security and requires a 12- month lease and follows all HOME program guidelines.

ROCKLAND FAMILY SHELTER TBRA PROGRAM

The program guidelines for the Rockland Family Shelter Tenant Based Rental Assistance Program is the same as the United States Department of Housing and Urban Development Section 8 Voucher Program. The policies and procedures are available at the Rockland County Office of Community Development and are in accordance with federal and New York State Division of Housing and Community Renewal regulations and administrative plans.

The assistance is for a minimum of 6 months to a maximum of 24 months. The program will require assisted families to pay the total tenant payment as determined in accordance to Section 8 Voucher Program regulations. Eligibility for a second year is based on employment history and achieving self-sufficiency. Persons that were terminated from the Section 8 Voucher Program are not eligible for assistance.

To be eligible, the applicant must have prior to participation resided in the Rockland Family Shelter and was a resident of Rockland County for a minimum of one-year. The applicant must be receiving services from the Rockland Family Shelter through the Supportive Housing Grant. The applicant must be fully employed with a goal of family self-sufficiency within two years of initial lease up.

COMMUNITY DEVELOPMENT TBRA PROGRAM

The program guidelines for the Community Development Tenant Assistance Program are the same as the United States Department of Housing and Urban Development Section 8 Voucher Program. The policies and procedures are available at the Rockland County Office of Community Development and are in accordance with federal and New York State Division of Housing and Community Renewal regulations and administrative plans. The assistance is for one-year with the maximum time a person or family may receive assistance is for a total of 24 months.

To be eligible a family or individual must be chronically homeless, facing a court ordered eviction within 7 days, or someone who will be “reached” for subsidized housing within 2 years of assistance.

HOMEBUYER ASSISTANCE PROGRAM

To qualify, a Rockland resident must be purchasing a home and meet the low-income guidelines. The guidelines for the program are that the maximum funds a family can receive is the lower of \$7,500 or 5% of the purchase price of the money needed to close the “gap” and a “match,” money out of pocket by the homebuyer is required. The maximum Housing Expense and Housing/Debt ratio cannot exceed 40%. Funds the family earns from an approved Federal Home Loan Bank “First Home Club” is an acceptable match. The following is an overview of the Homebuyers Assistance Program that will provide assistance to persons of low income to purchase their primary residence.

Qualifications

Persons who reside in a Rockland County Consortium Community (the Village’s of New Square, Wesley Hills, and Upper Nyack are non-members) of low income, who will occupy the property as their principal residence.

A "low income person" is defined as having a household income according to national published Median Family Income (taxable or non taxable) that the household receives as defined by the United States Department of Housing and Urban Development.

Eligible properties

Either newly constructed or existing property located in a Rockland County Consortium Community (the Village's of New Square, Wesley Hills, and Upper Nyack are non-members), which meets the United States Department of Housing and Urban Development’s Housing Quality Standards. The residence can be any of the following:

1. Single family property
2. Condominium units
3. Manufactured home
4. Mobile home
5. Cooperative units

6. Legal two-family residence

The appraised value of the property cannot be greater than the FHA guaranteed loan amount for Rockland County.

Assistance and Availability

The County will lend the qualifying household the lower of \$7,500 or 5% of the purchase price to pay a portion of the down payment and cover the closing costs. The total amount the County will lend is based on the total amount needed to "Close the Gap" and a dollar for dollar match. It is required that the family borrows the maximum available through a lender. This loan will be secured by a second mortgage on the property that will not be repaid until the property is sold or the borrower comes off title.

It is expected that future money will be available as long as Congress funds the HOME Program. The money will be given out on a "first-come, first-served" basis.

Procedure

The funds become available by the prospective owner finding a home that qualifies, then applying to a local lending institution for a mortgage. If a person and the property is approved for a loan and the lending institution is prepared to issue a mortgage commitment letter but the prospective purchaser needs assistance to pay the required down payment and closing costs, then evidence of this should be forwarded to the Rockland County Office of Community Development office.

The information will be reviewed and as moneys are available under the Program, the Office of Community Development will commit the necessary funds to close this "gap".

Additional Requirements for Two Family Residences

The requirements for the purchase of a legal two family residence are slightly different as follows:

1. If the residence is purchased by a low income resident, the amount of the loan is stated as above. The second unit in the house must be rented to another low-income resident (as defined above) at rents no greater than the rents set by the Federal Fair Market Rent regulations. Please note that the above rents include all utilities. If utilities are not included, the above rents must be reduced according to schedules on file in the Rockland County Office of Community Development Office. The County will verify the income of the resident of the second unit and the rental paid on a yearly basis.

2. If the residence is purchased by two- (2) low-income households (either related or non-related) the amount of the loan each household can receive will be determined by dividing the purchase price by two (2) and the 5% formula will be applied to that amount. A single

mortgage for the total amount will be placed on the property with each household signing a note for only 1/2 the amount of the mortgage.

AMERICAN DREAM DOWN PAYMENT INITIATIVE

To qualify, a Rockland resident must be purchasing a home and meet the low-income guidelines. The guidelines for the program are that the maximum funds a family can receive is the higher of \$10,000 or 6% of the purchase price of the money needed to close the “gap” and a “match,” money out of pocket by the homebuyer is required. Funds the family earns from an approved Federal Home Loan Bank “First Home Club” is an acceptable match. The following is an overview of the Homebuyers Assistance Loan Program that will provide assistance to persons of low income to purchase their primary residence.

Qualifications

Persons who reside in a Rockland County Consortium Community (the Village’s of New Square and Upper Nyack are non-members) of low income, who will occupy the property as their principal residence.

A "low income person" is defined as having a household income according to national published Median Family Income (taxable or non taxable) that the household receives as defined by the United States Department of Housing and Urban Development.

Eligible properties

Either newly constructed or existing property located in a Rockland County Consortium Community (the Village's of New Square and Upper Nyack are non-members), which meets the United States Department of Housing and Urban Development’s Housing Quality Standards. The residence can be any of the following:

1. Single family property
2. Condominium units
3. Manufactured home
4. Mobile home
5. Cooperative units
6. Legal two-family residence

The appraised value of the property cannot be greater than the FHA guaranteed loan amount for Rockland County.

Assistance and Availability

The County will lend the qualifying household the higher of \$10,000 or 6% of the purchase price to pay a portion of the down payment and cover the closing costs. The total amount the County will lend is based on the total amount needed to "Close the Gap" and a dollar for dollar match. It is required that the family borrows the maximum available through a lender. This loan will be secured by a second mortgage on the property that will not be repaid until the property is sold or the borrower comes off title.

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If the residence is purchased by two- (2) low-income households (either related or non-related) the amount of the loan each household can receive will be determined by dividing the purchase price by two (2) and the 5% formula will be applied to that amount. A single mortgage for the total amount will be placed on the property with each household signing a note for only 1/2 the amount of the mortgage.

AMERICAN RECOVERY AND REINVESTMENT ACT

HOMELESS PREVENTION AND RAPID RE-HOUSING PROGRAM

The county will utilize funds as a supplement to expand existing services provided by the Department of Social Services and Office of Community Development. All services are consistent with the Consolidated Plan of 2005-2009. The maximum benefit per family through the Homeless Prevention and Rapid Re-Housing (HPRP) program is \$3,000.00.

All families must meet with a housing-related case management person at the Department of Social Service. The DSS case management will be provided to each family that receives Homeless Prevention and Rapid Re-Housing funding. A housing plan will be developed with the family and monitored by the case manager. The case manager will meet with the family at least twice a month and complete all required forms to include all required by the United States of Housing and Urban Development (HUD). The case manager will also maintain all families in the Rockland County Homeless Management Information System (HMIS) as required by The American Recovery and Reinvestment Act of 2009. The goal will be to insure that at the end of the supplement period the family will have the means to pay their full monthly rent.

The Rockland County Office of Community Development will serve as the program administrator and will make all final eligibility determinations. Community Development will also process all payments for eligible families.

The Rockland County Office of Community Development will follow the same practices it utilizes with the HUD Entitlement grants in regards to timeliness for expending grant funds. Annually the County of Rockland spend its CDBG and is below the 1.5 times threshold several months (4-6) in advance of the regulatory timeline. As with the HUD Entitlement grants, Rockland County Office of Community Development as the designated grantee will be responsible for ensuring that HPRP funds are used in accordance with all program requirements. The use of designated public agencies, Subrecipients, or contractors does not relieve the Office of Community Development of this responsibility.

The Office of Community Development is also responsible for determining the adequacy of performance under subrecipient agreements and procurement contracts, and for taking appropriate action when performance problems arise. The Office of Community Development is responsible for applying to the Rockland County Department of Social Services and any other subrecipient the same requirements as are applicable to the Office of Community. The Office of Community Development will also apply all administrative requirements as defined in Part 85 to the monitoring and administration of HPRP funds

Short term rental assistance - For families facing eviction and already in the court system, due to loss of income have rental arrears and are unable to pay full monthly rent on an ongoing basis. A rental subsidy will be provided for no more than 3 months depending on case circumstances. The subsidy amount will be determined following Section 8 guidelines. The maximum benefit per family is the greater of \$3,000.00 or 3 months assistance.

Security/Utility Deposit and Utility payments- those families who have exhausted all available benefits for security/utility deposits and utility payments will be offered assistance if they are in need of a deposit to secure housing or are faced with a shut off. The maximum benefit per family is \$3,000.00 with the maximum housing security deposit equaling the maximum allowable under New York State law of two months of the rent.

Eviction Prevention – Funds will be used to prevent the initial occurrence of homelessness by providing legal counsel to eligible tenants who are subject to eviction proceedings and cases will be settled by paying the rent arrears to avoid eviction. The maximum benefit per family is \$3,000.00 to include all legal costs.

Qualifications - Persons who reside in a Rockland County that meet the “low-income” qualifications. A "low income-person" is defined as having a household income of 50% of the Rockland County published Median Family Income (taxable or non taxable) that the household receives as defined by the United States Department of Housing and Urban Development.