



where we live nyc

FAIR HOUSING TOGETHER

Confronting segregation and taking action
to advance opportunity for all.

Appendices



The City of New York
Mayor Bill de Blasio

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Deputy Mayor for Housing and
Economic Development



Appendices

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Appendix A

Community Conversations Results

Introduction

Appendix A includes the Community Conversations: New Yorkers Talk Fair Housing report, released in June 2019, which summarizes what was learned through a series of focus-group style conversations with New Yorkers about fair housing issues. The Community Conversations invited New Yorkers to reflect on how they make tough decisions about where to live, their varied experiences in searching for housing, how their home and neighborhood impact their lives, and what goals they have for their family and community.

COMMUNITY CONVERSATIONS:

new yorkers talk fair housing

JUNE 2019



where
we live
nyc FAIR HOUSING TOGETHER

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executive summary

Through Where We Live NYC, the City of New York is undertaking an inclusive, comprehensive, and collaborative planning process to build the next chapter of fair housing policy for our city. To better understand how challenges like segregation and discrimination impact the lives of New Yorkers, the NYC Department of Housing Preservation and Development (HPD) and Hester Street organized 62 Community Conversations across the five boroughs in 15 different languages, engaging more than 700 New Yorkers.

what is Where We Live NYC?

A collaborative planning process led by the City of New York to develop the next chapter of fair housing policies that confront segregation, fight discrimination, and build more just and inclusive neighborhoods.

what is a community conversation?

An interactive focus-group style meeting of New York City residents from a specific population, community, or neighborhood led in partnership with a trained community organization or HPD staff.



how we engaged

Through the Where We Live NYC Community Conversations, we sought to understand the lived experiences of populations protected by fair housing law, while also sharing tools, information, and resources to support residents in creating and advocating for change.

To reach a meaningful cross-section of New Yorkers from a variety of backgrounds and geographies, we partnered with community-based organizations who have cultivated trusting relationships with residents. The conversation format and materials were designed with a focus on accessibility. We worked with community partners to develop translated materials and modifications for people with disabilities.

WHO WE REACHED

We held conversations to understand the unique fair housing challenges of the following communities:



Various racial, ethnic, and religious communities



Immigrants, including undocumented individuals and those with limited English proficiency



People with disabilities, including mobility, sensory, and developmental disabilities



LGBTQ individuals, including transgender and gender nonconforming individuals



Residents using rental assistance, including Section 8 Housing Choice Vouchers and City-administered programs like CityFHEPS



NYCHA residents

Survivors of domestic violence

Youth and seniors

Justice-involved individuals

Homeless or formerly homeless individuals

62 Community Conversations

700+ participants

ABOUT 1/3

- » are Black
- » have or are living with someone with a disability
- » are seniors (age 62 or older)

MORE THAN 1/4

- » are Hispanic/Latinx
- » are residents living with children

ABOUT 40%

- » are extremely low income (making a household income of \$20,000 or less)

what we learned

The Community Conversations invited New Yorkers to reflect on how they make tough decisions about where to live, how their home and neighborhood impact their lives, and what goals they have for their family and community. Below is a summary of key insights from across different conversations:



CONFRONTING SEGREGATION

The City is working to better understand how New Yorkers experience segregation, diversity, and inclusion across different populations and neighborhoods. We will use this input to develop policy that takes a balanced and nuanced approach to these issues.

When it comes to integration, New Yorkers have different definitions.

For some, integration is when a diverse set of people call the same neighborhood home. Others define integration as an active process of building trust and relationships between neighbors from diverse backgrounds, rather than a measurement of who lives where. When discussing integration, New Yorkers often focused on race and ethnicity, though definitions can expand to include socioeconomic diversity, disability, gender identity, and sexual orientation.

For many, equity matters more than integration.

In discussing their vision for fair housing, many residents focused less on integration and more on equitable access to opportunities and amenities, especially in diverse and non-White neighborhoods.

Enclaves can offer both opportunities and limitations

Participating New Yorkers shared a variety of perspectives when it comes to living in enclaves with residents of a similar background. Some depend on enclaves to practice cultural traditions, attend places of worship, shop for specialized goods, or connect with neighbors, employers, and doctors who speak their language. Others prefer living in diverse neighborhoods, often believing that integrated neighborhoods open up more opportunity and economic advancement.

“Being from the Bronx, nearly all the neighborhoods that I have lived in were exclusively Black and Latino. I don’t think this was a problem. [But] the fact that class or economic diversity didn’t exist in these neighborhoods did limit our community’s offerings and livability.”

—COMMENT, WHERE WE LIVE NYC WEBSITE

Gentrification does not feel like meaningful integration

For many New Yorkers, gentrification is their only experience living in what they consider to be a racially integrated neighborhood, and many are worried about the impact on their communities. Residents reported that rapid demographic shifts can strain local relationships, as longtime residents and businesses are no longer able to afford to stay and norms regarding culture, policing, gathering, and street life change.

Integration has the potential to build stronger communities, but it takes work.

Many residents view integration as an opportunity to build tolerance, unity, and solidarity across diverse communities. However, most participating residents shared that this vision of integration is aspirational and rarely something they experience in their neighborhoods. Many recognized that time, energy, and resources are required to build trust and relationships at the local level.

Recognizing that unequal treatment in the housing market takes many forms, it is essential for the City to understand exactly how these challenges play out, what forms discrimination takes, and where there are gaps in fair housing enforcement.

FIGHTING DISCRIMINATION

More than 50 years after the Fair Housing Act was passed, many New Yorkers still face discrimination when it comes to finding and maintaining their homes. Recognizing that unequal treatment in the housing market takes many forms, it is essential for the City to understand exactly how these challenges play out, what forms discrimination takes, and where there are gaps in fair housing enforcement.

Housing discrimination remains a major challenge for New Yorkers.

Participating New Yorkers shared detailed accounts of discrimination by landlords, brokers, and other real estate professionals when trying to find housing, illustrating that discrimination in the housing search process is still a widespread practice that limits housing options.

Fighting discrimination also means fighting the unequal treatment of tenants.

New Yorkers made clear that discrimination and unfair treatment occur frequently beyond the housing search process in interactions with landlords and management as a tenant. From poor repairs to racist threats of violence, residents reported experiencing mistreatment because of their identity, often with a clear connection to fair housing protections.

Stigma and bias are especially challenging for residents using government housing programs.

Many participants discussed how they face stigma living as a resident of the NYC Housing Authority (NYCHA) or using rental assistance, including Section 8 Housing Choice Vouchers and City-administered programs like CityFHEPS. The experiences of participants illustrate how negative bias about poverty, often reinforced by racism, can limit residents' access to housing and other opportunities. Many described feeling that landlords, brokers, neighbors, and sometimes even case managers and support staff working for the City treat them like criminals.

Enforcement processes often leave residents feeling powerless.

Many participating residents expressed that the power dynamic between tenants and landlords leaves them feeling trapped and helpless in the face of discrimination and harassment. Many choose not to report bad behavior because they fear retaliation or have concerns about finding a new home with the limited affordable housing options in New York City's competitive market. Some residents who reported taking action, found enforcement processes to be slow, time consuming, and confusing.

PROMOTING HOUSING CHOICE

The City is seeking to increase opportunity for all New Yorkers by promoting housing choice—the choice to move into a different neighborhood or the choice to stay in a neighborhood, even as it changes. Detailed information about why New Yorkers live in their neighborhood and where they want to move will help the City develop policies to better support New Yorkers in making the housing choice that is best for themselves, their families, and their communities.

Few New Yorkers feel like they have meaningful options when choosing a home or neighborhood because of the high cost of housing.

Most participating residents were low-income and reported that the high cost of housing in New York City dramatically limits their ability to have a real choice in their home and neighborhood. Instead, residents reported compromising with poor conditions and overcrowding, or limiting their housing search to neighborhoods that feel unsafe or have underperforming schools. Residents also shared that they rely heavily on government housing programs, including the shelter system, in order to survive in a market that feels too expensive for them.

A lack of housing choice impacts the most fundamental details of New Yorkers' lives.

Residents discussed the high stress and sacrifice that results from having little or no access to safe, quality, and affordable housing. In addition to housing challenges, many residents reported regularly travelling far distances because their neighborhood lacks quality employment, schooling, doctors, or groceries.

Family, community, and sense of belonging play a major role in where people live.

Participating New Yorkers stressed the importance of living near family and community. These local relationships can serve as key support systems, especially for recent immigrants. Residents of color also reported that they feel they have fewer options because of historic and present-day norms about who is welcome where and how neighborhoods are monitored and policed.

Government housing programs can have a limiting impact on neighborhood choice

Government housing programs—including NYCHA, rental assistance programs, supportive housing, and HPD-funded housing—provide positive, even transformative opportunities for many participating residents seeking housing stability. However, residents also reported that participating in these programs can mean losing the opportunity to choose their neighborhood—prioritizing an affordable apartment, regardless of location. This can mean moving away from friends and family, moving into neighborhoods with fewer resources, or feeling stuck in government housing programs because the private market is too expensive.

“My coworker says, ‘Why would anyone want to live in the projects?’ And I say, ‘Where else am I going to live?’ My mom is disabled so she can’t work and also she has a lot of us. It’s hard. We would be homeless otherwise. People live where they can afford to live.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

INCREASING ACCESS TO OPPORTUNITY

Through Community Conversations, New Yorkers discussed how the interplay of forces like gentrification, integration, and housing choice affect their access to resources and opportunity. They also shared what makes a neighborhood great. This feedback will inform the City's policy approach as it addresses disparities in government and private investment across neighborhoods and works to provide the resources residents need to thrive.

New York City offers unparalleled opportunities.

Many participating residents discussed how New York City offers opportunities that they could not find living anywhere else. Residents celebrate the strong public benefits, access to good education, and welcoming neighborhoods filled with diverse cultures and identities.

Deep inequalities exist in access to opportunity

Residents discussed their perceptions of how investments from government and the private sector may vary dramatically across different neighborhoods. Many New Yorkers believe that historic and present-day racism impact who has access to opportunity and perceived that neighborhoods with more White residents often have more wealth, investment, and higher-quality amenities. Residents also discussed the complex dynamic between gentrification, opportunity, and exclusion—reflecting on who gets access to amenities as neighborhoods change.

New Yorkers discussed how the interplay of forces like gentrification, integration, and housing choice affect their access to resources and opportunity.

DEFINING SUCCESS

During the Community Conversations, participating New Yorkers developed a collective vision of what success looks like for their own housing journey, their family and community, and the Where We Live NYC process. In dreaming up this future, residents stressed the importance of belonging, community connection, dignity, and self-determination.



what's next

The input gathered through the Community Conversations will directly inform the City's development of fair housing goals and strategies that confront segregation, fight discrimination, and increase opportunity for all.

In addition to the Community Conversations, the City is also conducting data analysis, collaborating with more than 30 government agencies, and collecting input from a Fair Housing Stakeholder Group of more than 150 advocates, service providers, researchers, and community leaders to help inform the process.

The City will release a draft Where We Live NYC report in the summer of 2019 that will include a full overview of what we have learned throughout this effort along with draft goals and strategies. A final report will be published in the fall of 2019 that will formally launch the implementation phase of this process, following a detailed policy action plan outlined in the report.



JOIN THE CONVERSATION!

Share your fair housing ideas and experience to help us build a more just future for our city.

Visit nyc.gov/WhereWeLive:



Host your own Community Conversation with friends, family, or neighbors



Answer questions online about your home and neighborhood



Learn more about the history of fair housing and your rights



Explore data on diversity and opportunity in New York City



Sign up for our newsletter to hear about upcoming events and announcements



You can also share a thought-provoking quote from a Community Conversation or your own fair housing insights using **#WhereWeLiveNYC**.

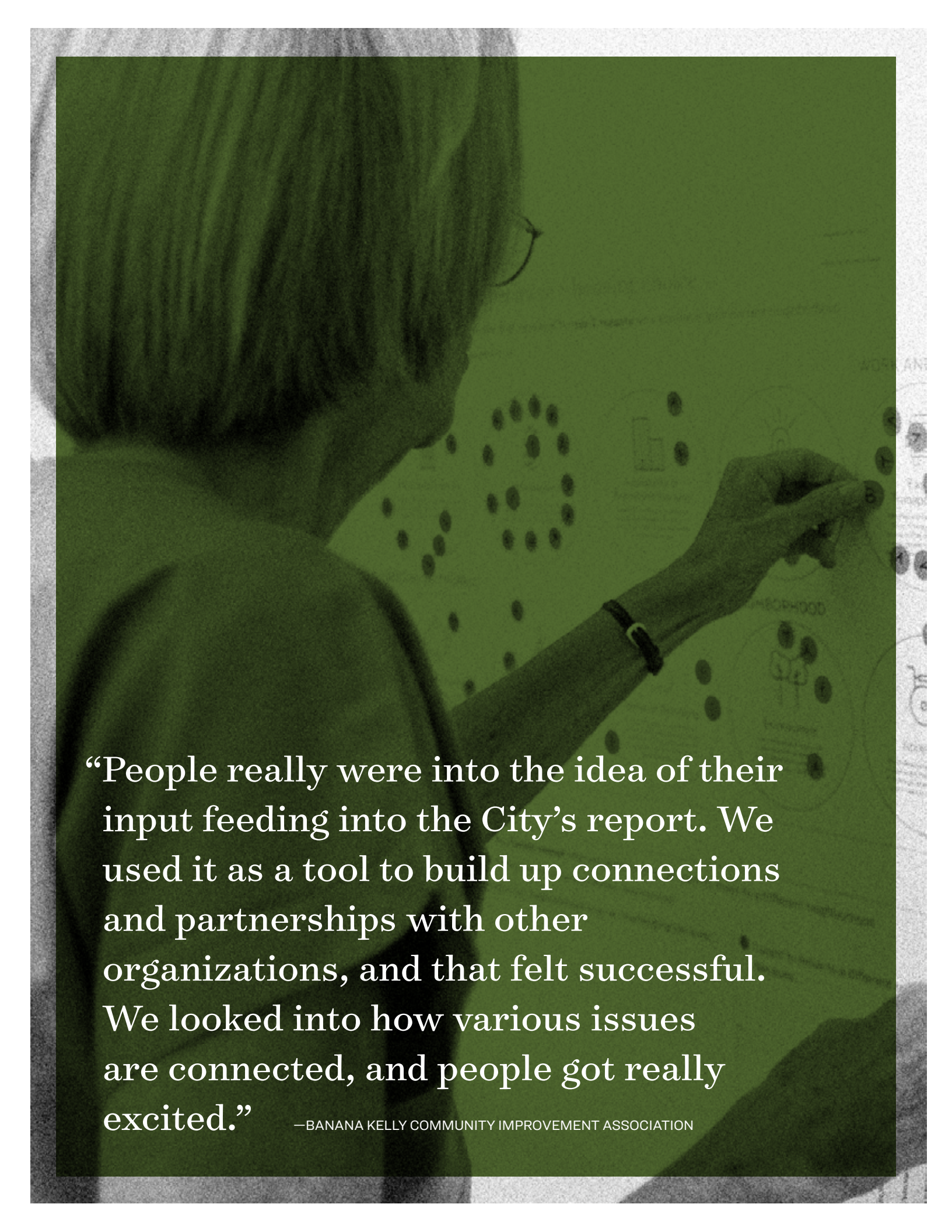


introduction

Where we live matters. It impacts our access to affordable housing, good jobs, quality schools, reliable transportation, and a neighborhood that is safe, healthy, and welcoming. That is why the City of New York is working with residents and community leaders through the Where We Live NYC process to better understand how challenges like segregation and discrimination impact New Yorkers' lives and to develop policy solutions that advance opportunity for all.

This document provides an overview of key insights shared by more than 700 New Yorkers who participated in 62 Community Conversations. There is also a detailed overview of how the NYC Department of Housing Preservation and Development (HPD) and Hester Street designed the Community Conversations in partnership with dedicated community-based organizations, as well as information on how to get involved with the Where We Live NYC process moving forward.

The Community Conversations are one of several key inputs feeding into the Where We Live NYC process. The City is also conducting extensive data analysis; collaborating with more than 30 government agencies, including the NYC Housing Authority (NYCHA); and consulting a Fair Housing Stakeholder Group of more than 150 advocates, service providers, researchers, and community leaders. Taken together, this feedback and data analysis, will inform policy solutions that fight discrimination, break down barriers to opportunity, and build more just and inclusive neighborhoods.



“People really were into the idea of their input feeding into the City’s report. We used it as a tool to build up connections and partnerships with other organizations, and that felt successful. We looked into how various issues are connected, and people got really excited.”

—BANANA KELLY COMMUNITY IMPROVEMENT ASSOCIATION

how we engaged

New Yorkers are experts in their own experience, which is why the City held 62 Community Conversations in neighborhoods across the five boroughs to learn directly from a diverse cross-section of residents about how fair housing issues impact their lives. The Where We Live NYC Community Conversations were designed to:

ENGAGE & ACKNOWLEDGE

Clearly communicate the goals and outcomes of Where We Live NYC and acknowledge the historical and ongoing injustices related to housing discrimination and segregation.

LISTEN & LEARN

Hear directly from New Yorkers how segregation, discrimination, and housing choice affect their lives, families, and access to opportunity—and discuss what we can do moving forward.

CONNECT & BUILD CAPACITY

Build community ownership of the process by investing in community-based partners to help us listen to residents and collect data, while also sharing information about fair housing history and current fair housing resources.



community-centered approach

HPD and Hester Street designed a decentralized engagement model that built the capacity of trusted community partners to lead focus group-style Community Conversations in their neighborhoods.

This allowed us to engage more than 700 New Yorkers in meaningful, intimate conversations in 15 different languages about challenging issues and, at times, painful experiences. The conversation format and materials were also designed with a focus on accessibility, and we worked with community partners to develop translated materials and modifications for people with disabilities.

“Our base is made up of people in public housing. We’ve been thinking about how we move our members from anger to strategy, so I appreciate that the [Where We Live NYC] tools laid out where we fit in. Our members were able to see how people were impacted by redlining. That is how we got here in the first place, and this is how we move forward.”

—FIFTH AVENUE COMMITTEE

COMMUNITY-BASED PARTNERS:

Ali Forney Center
Arab American Association NY
Asian Americans for Equality
Banana Kelly Community Improvement Association
Brooklyn Center for Independence of the Disabled
Center for Court Innovation
Center for Independence of the Disabled NY
Chhaya Community Development Corporation
Fifth Avenue Committee
Make the Road New York
Neighbors Together
SAGE Advocacy & Services for LGBT Elders
Sapna NYC

ADDITIONAL SUPPORT FROM:

Arverne View Tenant Association/L+M Development Partners
The Axis Project
Bronx Power
Flatbush Development Corporation
Guns Down Life Up
HPD’s Division of Tenant Resources
Independence Care System
Mekong NYC
Metropolitan Council on Jewish Poverty
MinKwon Center for Community Action
Neighbors Helping Neighbors
NYC Anti-Violence Project
NYC Housing Authority (NYCHA)
NYC Mayor’s Office to End Domestic and Gender-Based Violence (ENDGBV)
NYC Family Justice Center in Staten Island
The Point Community Development Corporation
Sadhana: Coalition of Progressive Hindus
United Jewish Organizations of Williamsburg
Voces Latinas

format

RACIAL JUSTICE AND FACILITATION TRAININGS

To cultivate inclusive and affirming spaces for residents, staff from all participating community partner organizations and HPD attended a day-long training focused on facilitation skill-building, racial justice framing, and education on fair housing issues. During this training, the Interaction Institute for Social Change (IISC) provided tools and guidance for fostering a meaningful and productive dialogue at the intersection of race, discrimination, and fair housing.

DOWNLOADABLE COMMUNITY CONVERSATIONS

We also developed a downloadable toolkit, hosted on the Where We Live NYC website, to invite any resident or organization to lead their own Community Conversation and share back insights to inform the process. The toolkit includes a short video about the history of segregation in New York City and links to resources for participants to continue learning about fair housing or get support for specific housing needs.

CONVERSATIONS LED BY COMMUNITY PARTNERS

Our community partner organizations enabled us to reach residents who would not otherwise interact with government, especially around issues as sensitive as segregation and discrimination. The Community Conversations invited residents into the Where We Live NYC process, capturing their personal experiences and deep knowledge of neighborhoods, while also sharing tools, information, and resources to support residents in creating and advocating for change.

ONGOING ENGAGEMENT

Following the Community Conversations, we invited staff from participating community-based organizations to discuss what they learned and how they might work together on long-term fair housing and related advocacy goals. Building off these conversations, HPD will hold a series of public events throughout 2019 where New Yorkers can learn about emerging insights, goals, and strategies and share additional feedback. Input from the Community Conversations will also inform ongoing meetings of the Fair Housing Stakeholder Group.

CONVERSATIONS LED BY HPD

HPD organized and led additional conversations with community-based and government partners to ensure that our engagement surfaced ideas from a diverse and broad range of residents impacted by fair housing challenges.

“Usually the members in the community we serve are cautious about sharing their past experiences around discrimination and housing, especially when those asking are not members of their community. But our members were very happy to participate. They loved sharing experiences even if those experiences weren’t so pleasant.”

—ARAB AMERICAN ASSOCIATION NY

who we reached

The Community Conversations focused on engaging populations historically impacted by fair housing issues and communities that often have less voice in government decision-making. Specifically, we held conversations to understand the unique fair housing challenges of the following communities:



Various racial, ethnic, and religious communities



Immigrants, including undocumented individuals and those with limited English proficiency



People with disabilities, including physical; sensory (blind, deaf, hard of hearing); and intellectual disabilities



LGBTQ individuals, including transgender and gender nonconforming individuals



Residents using rental assistance, including Section 8 Housing Choice Vouchers and City-administered programs like CityFHEPS



NYCHA residents
Survivors of domestic violence
Youth and seniors
Justice-involved individuals
Homeless or formerly homeless individuals

62
Community Conversations

700+
participants

70%
of conversations included a language other than English

15
languages

Arabic, American Sign Language, Bangla, Cantonese, English, Haitian Kreyol, Hindi, Khmer, Korean, Mandarin, Nepali, Punjabi, Russian, Spanish, Vietnamese

demographics*

MORE THAN
1/4

- » are Hispanic/Latinx
- » are residents living with children

ABOUT
1/3

- » are Black
- » have or are living with someone with a disability
- » are seniors (age 62 or older)

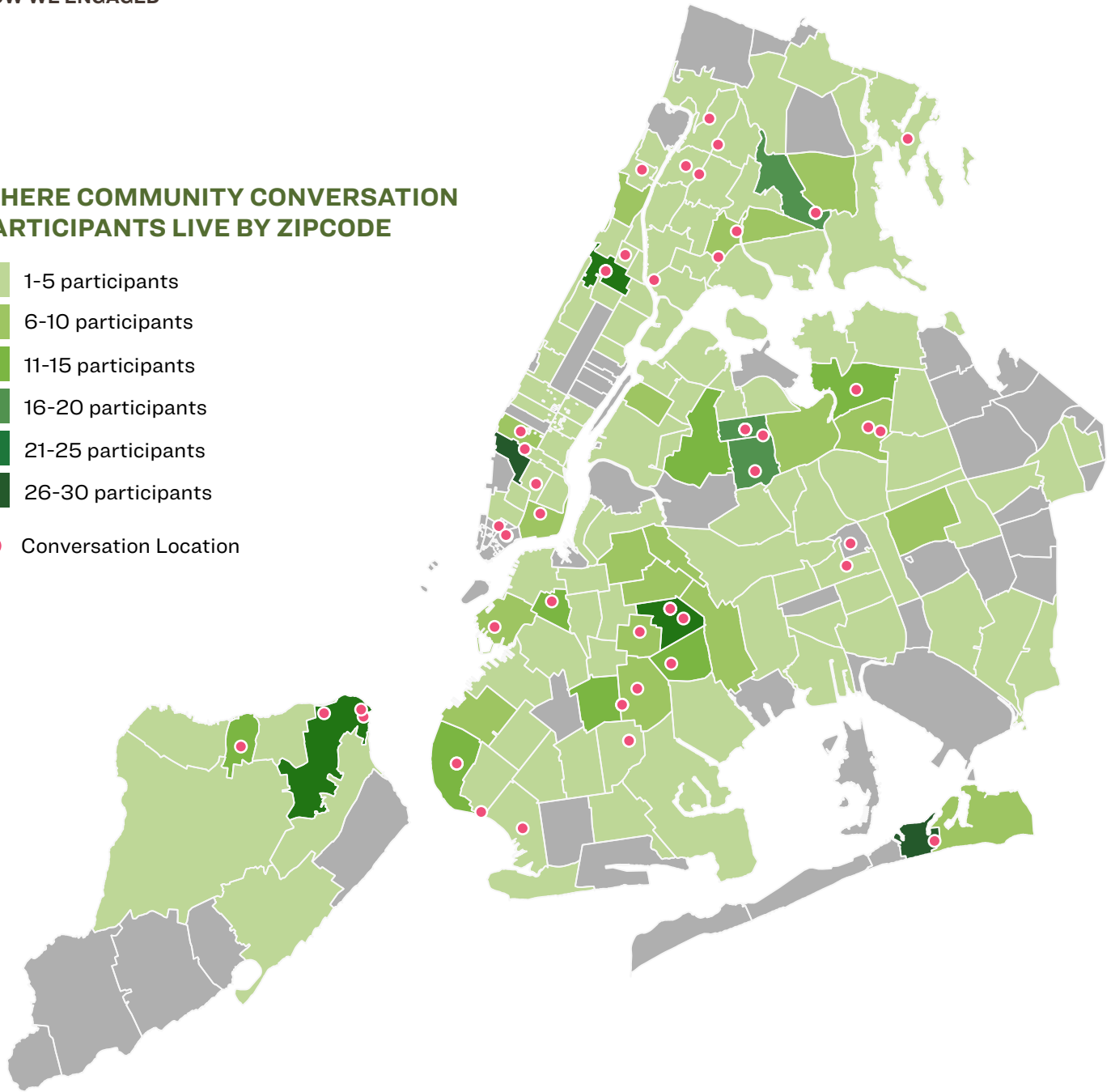
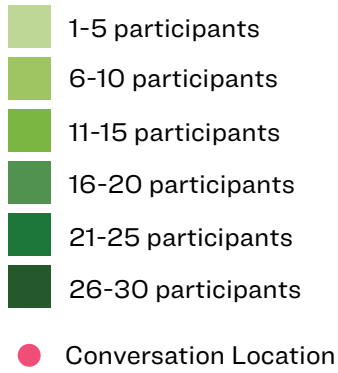
ABOUT
40%

- » were born outside the U.S

ABOUT
20%

- » have limited English proficiency

WHERE COMMUNITY CONVERSATION PARTICIPANTS LIVE BY ZIPCODE



income & housing*

ABOUT 40%

» are extremely low income (making a household income of \$20,000 or less)

ABOUT 25%

» are low-income (making a household income of \$20,000-\$49,999)

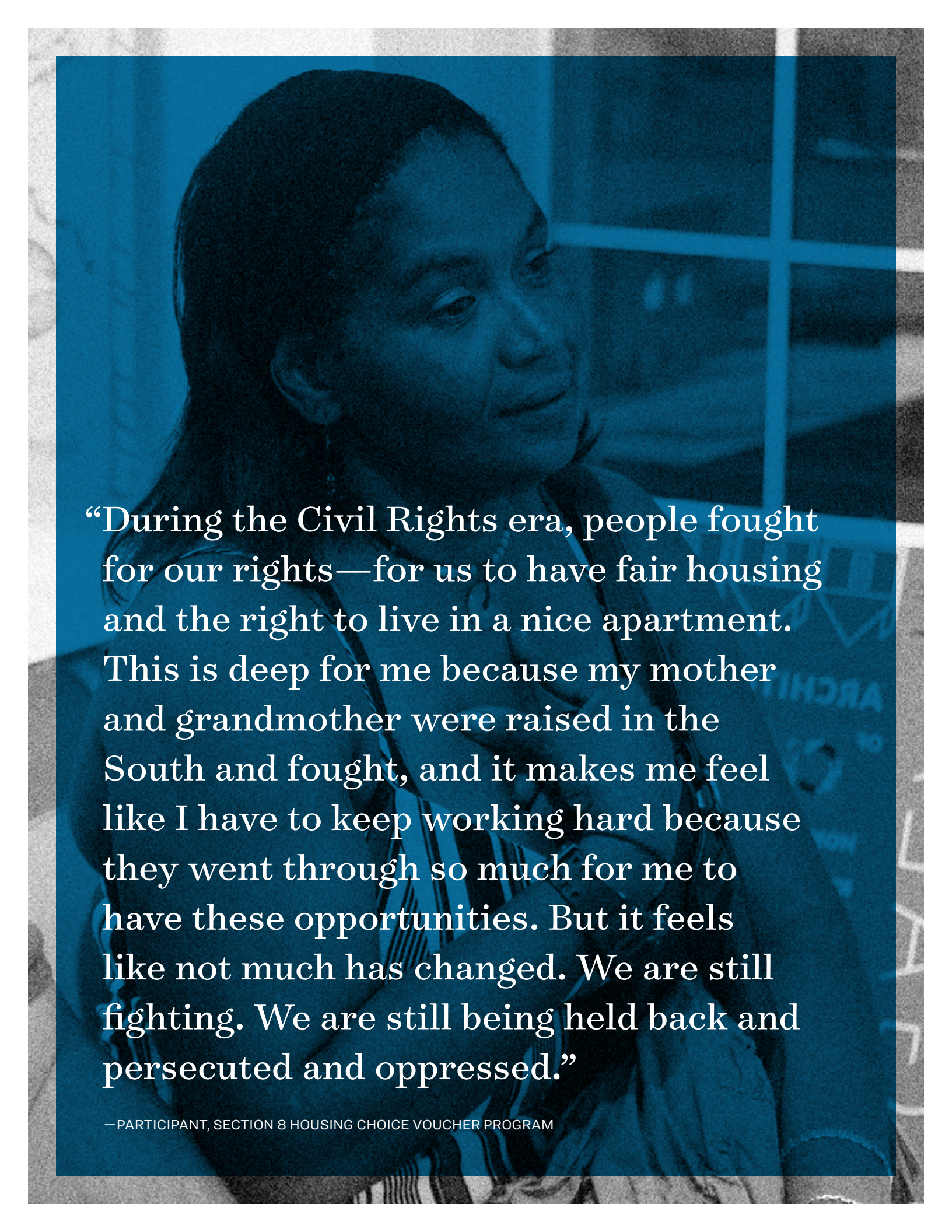
ABOUT 15%

» are residents using rental assistance

1 IN 5

» have experienced homelessness
 » are NYCHA residents

*From Community Conversation participants who submitted worksheets. Note that response rates for questions on submitted worksheets ranged from 75-88%.



“During the Civil Rights era, people fought for our rights—for us to have fair housing and the right to live in a nice apartment. This is deep for me because my mother and grandmother were raised in the South and fought, and it makes me feel like I have to keep working hard because they went through so much for me to have these opportunities. But it feels like not much has changed. We are still fighting. We are still being held back and persecuted and oppressed.”

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

WHAT WE LEARNED:

confronting segregation

To understand fair housing challenges, we must understand our shared history and recognize the ongoing legacy of segregation and the impact it has on New York City today.

Each Community Conversation began with a short presentation on the history of fair housing to acknowledge the past, spark a discussion of participants' current experiences with segregation and integration, and open up dialogue about what it means to build a more just future. Through the conversations, residents discussed whether their current neighborhood feels diverse, integrated, and welcoming, and if living in an integrated neighborhood is something they value.

With this feedback, the City is working to better understand the experiences of different populations and neighborhoods, using this input to develop policy that takes a balanced and nuanced approach to these issues.

COMMUNITY CONVERSATION ACTIVITY

our shared history

Each Community Conversation started with a presentation that briefly walked participants through relevant moments in American history, from the end of slavery through redlining and urban renewal to present-day disparities in access to opportunity and fair housing rights. For some residents, especially recent immigrants, this history presentation provided new context. For others, it validated painful and formative personal experiences.

“I lived my whole life in Cypress Hills [in Brooklyn]. When my family moved here, it was largely White, but [the White residents] were moving out to Howard Beach. My grandparents would tell me stories of the White neighbors hating the people of color moving in, they would throw garbage on their street. It’s racially integrated now—a mix of West Indian, Caribbean, South Asian, Latino, and Bengali populations. My parents wanted to move to Forest Hills, but the real estate agent steered them to Cypress Hills. I see both segregation and also integration [in Cypress Hills]. There are people of color coming together, but it’s because of class. Most people move here because it’s a working class neighborhood and they can’t afford to move into other neighborhoods.”

—PARTICIPANT, CHHAYA CDC

When it comes to integration, New Yorkers have different definitions.

For some, integration is when a diverse set of people call the same neighborhood home. Others define integration as an active process of building trust and relationships between diverse neighbors, rather than a measurement of who lives where. For these residents, integration looks like diverse interactions in local businesses and schools, opportunities to experience different foods and cultures, or residents from a mix of backgrounds coming together to tackle local issues.

When New Yorkers discussed integration, they often focused on race and ethnicity, but even these discussions were nuanced. For example, residents in Central Queens discussed the diversity of immigrant communities in their neighborhoods, but also recognized that they have very few Black neighbors. In other Community Conversations, definitions of integration expanded to include socioeconomic diversity, disability, gender identity, and sexual orientation.

“An integrated neighborhood simply is one with various racial, ethnic, socioeconomic groups.”

—COMMENT, WHERE WE LIVE NYC WEBSITE

“I have a very diverse community, but we’re not integrated. My community has people from all over the world in it, but we don’t go to the same church on Sunday, we don’t shop in the same stores. Even though we live together, we’re still not integrated. We don’t deal with community issues together.”

—PARTICIPANT, HPD-LED CONVERSATION IN SOUTH BROOKLYN



For many, equity matters more than integration.

In discussing their vision for fair housing, many residents focused less on integration and more on equitable access to opportunities and amenities, especially in diverse and non-White neighborhoods. Many New Yorkers living in neighborhoods they consider segregated did not view the lack of racial or ethnic diversity as an issue, and some even framed it as an asset. Instead, they cited the lack of socioeconomic

diversity and investment in their neighborhood as a negative feature.

Many residents discussed how sustainable integration requires tackling inequality head on, arguing that patterns of segregation will continue unless there is equal access to homeownership and economic opportunity regardless of race and ability.

“This is a color-conscious country. So, yes, I want integration because it brings better services. This country is Black and White. I don’t care about integration per se, only if I get benefits that I should have had all along.”

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

“Being from the Bronx, nearly all the neighborhoods that I have lived in were exclusively Black and Latino. I don’t think this was a problem. [But] the fact that class or economic diversity didn’t exist in these neighborhoods did limit our community’s offerings and livability.”

—COMMENT, WHERE WE LIVE NYC WEBSITE

“I think there’s something to be said about retaining the culture and uniqueness of communities as they are now. You lose that with integration. If it’s equitable, I don’t think [segregation] is such a bad thing.”

—PARTICIPANT, CHHAYA CDC

PERSPECTIVES ON CONFRONTING SEGREGATION

NYCHA RESIDENTS

Residents in NYCHA have a unique perspective on integration and segregation. Many believe that NYCHA buildings are racially segregated, and that this segregation contributes to stigma and unequal treatment. Residents outside of NYCHA also discussed the demographics and segregation of public housing in their neighborhoods:

“Where I live is just students and professors. Across the street is NYCHA, and it’s like day and night. I didn’t know how segregated New York was until I moved here. People don’t walk on that side of the street. You tend to stick with what you know.”

—PARTICIPANT, MEKONG NYC

Other NYCHA residents, especially those in senior buildings, shared a different perspective, describing how NYCHA successfully brings together residents from diverse backgrounds:

“Before, people lived nearby [in private homes], but they weren’t socially integrated. Now, there is integration on people’s floors—people watch out for each other... We see people that come from all over the world, and we have to learn how to live together.”

—PARTICIPANT, NYCHA PUBLIC HOUSING

But others found the integration within NYCHA developments to be more fraught, expressing resentment against new immigrants or sharing experiences with prejudice:

“The neighbors used to call us ghetto. My next-door neighbor called me an n-word, and they were White people living in the projects.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

LGBTQ INDIVIDUALS

Participating New Yorkers who identify as LGBTQ shared a more expansive vision of integration:

“Diversity is not just about Black and White—it’s about sexual identity and culture. New York City is an accepting city, but some neighborhoods are not.”

—PARTICIPANT, NEIGHBORS TOGETHER

For many LGBTQ residents, preferences around integration and segregation are directly connected to feelings of safety. Many shared that certain neighborhoods can feel like unsafe or unwelcoming places to express their gender identity or sexual orientation:

“Being LGBT, I have found it easier to live in a multi-ethnic neighborhood. When I lived in Astoria, I was the only non-Greek, and I would go to coffee shops and they wouldn’t say hello. When I lived in Norwood [in the Bronx], every nationality you can think of was there. You could flirt with different people and it didn’t matter!”

—PARTICIPANT, SAGE ADVOCACY & SERVICES FOR LGBT ELDERLS

Many also expressed wanting to live near other LGBTQ individuals or in LGBTQ-friendly spaces. Overall, LGBTQ residents viewed New York City as much more accepting than other places in the country:

“I came to New York in 1972 and lived in Harlem ever since. I love being a lesbian in New York City because you can be free to be who you are. I can be me in Harlem. If a person asks me my preference, I tell them. Everyone in my neighborhood knows and loves me.”

—PARTICIPANT, SAGE ADVOCACY & SERVICES FOR LGBT ELDERLS



PEOPLE WITH DISABILITIES

Participants with disabilities often discussed integration as something that happens within a building, as well as within a neighborhood. Most shared wanting opportunities to live outside of institutional settings like nursing homes, with neighbors who have a range of abilities. These preferences are often driven by a desire for independence, equity, and safety. As one resident using a wheelchair explained,

“In integrated housing, neighbors will help if I need it.”

—PARTICIPANT, BROOKLYN CENTER FOR INDEPENDENCE OF THE DISABLED

Many also shared that effective integration is about increasing awareness, visibility, and inclusion for people with disabilities. A resident with a hearing disability explained how even though she is in an integrated building, she continues to feel separated with different access and treatment:

“I would like more sign language access, more focus on the needs of deaf people, and the integration of all people without marginalization. This means having more groups where we can discuss and talk and learn from another to reach integration.”

—PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

Additionally, residents stressed that accessible local businesses and services are critical to inclusive and integrated neighborhoods.

Some participants discussed the importance of having other residents with disabilities in their building or neighborhood for solidarity and increased visibility:

“I want to see more disabled people in the neighborhood so I don’t feel like I’m the only one in a wheelchair.”

—PARTICIPANT, BROOKLYN CENTER FOR INDEPENDENCE OF THE DISABLED



Enclaves can offer both opportunities and limitations.

Different ethnic, religious, and immigrant communities across New York City shared a variety of perspectives when it comes to living in enclaves with residents of a similar background. Some depend on enclaves to practice cultural traditions, attend places of worship, shop for specialized goods, or connect with neighbors, employers, and doctors who speak their language. For many, enclaves are also places of security, where they can feel safe and accepted in their neighborhood.

Other residents from these same ethnic, religious, and immigrant communities prefer living in diverse

neighborhoods, often believing that integrated neighborhoods open up more opportunity and economic advancement. A few participating residents, many of them seniors, associated enclaves with exclusion, and they shared experiences of living in enclaves because discrimination left them with no other options. For these residents, integration signals progress and acceptance. Exclusion was also a concern for residents living in enclaves where they do not share the same background as the majority of residents. These residents shared feelings of isolation and challenges with language barriers.

“Living in a neighborhood of opportunity means that we can raise our families according to our cultural values. I want the Bangladeshi community to exist in the future for my children.”

—PARTICIPANT, SAPNA NYC

“Bay Ridge is safe because I can walk freely with my hijab and the community understands my religion.”

—PARTICIPANT, ARAB AMERICAN ASSOCIATION

“When I came to the U.S., I came to experience this culture. When I’m with my community, people like us, I’m not moving forward. New immigrants have to learn from the history and the people [who have been here], and get access to what this country has to offer.”

—PARTICIPANT, CHAYA CDC

“Chinatown comes from segregation. Chinatown should be and already is becoming diverse. There should be White, Black, and Latino people—everyone in the same neighborhood.”

—PARTICIPANT, ASIAN AMERICANS FOR EQUALITY

Gentrification does not feel like meaningful integration.

For many New Yorkers, especially those in Upper Manhattan and Brooklyn, gentrification is their only experience living in what they consider to be a racially integrated neighborhood, and many are worried about the impact on their communities. Residents reported that the demographic shifts can strain local relationships, as longtime residents and businesses are no longer able to afford to stay and norms regarding culture, policing, gathering, and street life change.

Within these gentrifying neighborhoods, a few residents shared how they welcome the change as a relief from historic patterns of disinvestment, but the majority of participants reported feeling that new amenities are not designed with them in mind—new businesses are too expensive, or improvements are only made near new development. Many longtime residents also expressed frustration that investments were not available before new residents came into the neighborhood.

“My neighborhood looks diverse, but when you analyze it, it is not [diverse] because people are being pushed out. Because the people with power, who actually own in the neighborhood, are not diverse and are trying to push people out, even if they want to stay.”

—PARTICIPANT, NEIGHBORS TOGETHER

“People like the idea of diversity, but then they move here and see that we can be loud and play reggae and hip-hop and soca and other mixes all day long. We’re cooking curry with rich smells and spices, but then people will complain that they don’t like the smell of our foods. Diversity is not always the best thing because people don’t know how to live with each other.”

—PARTICIPANT, FLATBUSH DEVELOPMENT CORPORATION

“Diversity is good, it’s great. It’s a beautiful thing. You can learn so much from different cultures. But there needs to be regulations, because as areas start to change, it gets out of control. People moving in start getting access to resources that the people who have always lived there do not get—like new housing, new parks, new stores, and groceries.”

—PARTICIPANT, NEIGHBORS TOGETHER

Integration has the potential to build stronger communities, but it takes work.

Many residents see integration as an opportunity to build tolerance, unity, and solidarity across diverse communities. Many identified that organizing for better local conditions can serve as common ground among diverse residents, bringing people together across racial and ethnic lines, as well as engaging longtime and newer residents in gentrifying communities. Similarly, the Hasidic Jewish and Muslim communities

both identified integration as key to combating hate and educating people about different religions and cultures.

However, most participating residents shared that this vision of integration is aspirational and rarely something they experience in their neighborhoods. Many recognized that time, energy, and resources are required to build trust and relationships at the local level.

“An integrated neighborhood is one where people care. If there is a problem, they will take it up to solve it. People will break down barriers and work together. We need to make sure everybody is helped.”

—PARTICIPANT, HPD-LED CONVERSATION IN SOUTH BROOKLYN

“Living in a diverse neighborhood is great because you get to speak to people you normally wouldn’t come across. You also get to see many cultures and traditions in action.”

—PARTICIPANT, BANANA KELLY CIA

“The fear of unknown is the worst thing. I believe it is very helpful to have an integrated community to learn about others.”

—PARTICIPANT, UNITED JEWISH ORGANIZATIONS

“We don’t really know what integrated feels like because everyone is too into themselves. Integration means connection—there are people together as a community, as one.”

—PARTICIPANT, ALI FORNEY CENTER



RESIDENT IDEAS

BUILDING LOCAL TRUST AND RELATIONSHIPS

SUPPORT LOCAL ORGANIZING to address neighborhood needs through tenant, block, and civic associations.

“We need unity. We also need to be more educated on our tenants’ rights. A lot of us stay quiet and do not know other people who are having similar issues to us.”

— PARTICIPANT, FIFTH AVENUE COMMITTEE

BUILD TRUST IN THE POLITICAL PROCESS so that local residents are encouraged to get involved and make their voices heard.

“People do not participate in community organizing, including my friends, because they believe the political system failed them.”

— PARTICIPANT, NEIGHBORS TOGETHER

BRING YOUNG PEOPLE TOGETHER outside of the classroom to build relationships with residents of different backgrounds at an early age.

INCREASE COMMUNITY BOARD DIVERSITY to ensure diverse voices are included in local leadership.

“We don’t have to be born here to be on the Community Board.”

— PARTICIPANT, CHHAYA

CONNECT THROUGH CELEBRATIONS that bring people out of their homes with block parties, parades, and cookouts. Participants also stressed the need to invest in local gathering spaces like community centers, parks, and gardens.

“True community spaces where different populations can come together and be friendly with each other. It builds morale. Spaces for community—not just for survival, but for celebration.”

— PARTICIPANT, ANTI-VIOLENCE PROJECT

PROMOTE ARTS AND CULTURE as a critical bridge between residents to foster a sense of local identity and discuss tough issues like race.

“Let’s educate ourselves and our young people about this racial history through exhibits and local events.”


— PARTICIPANT, BANANA KELLY

DESIGNATE LOCAL MEDIATORS to connect different communities within a neighborhood, foster understanding between new and old residents, and mediate petty disputes before they escalate.

HOST REGULAR BUILDING AND NEIGHBORHOOD MEETINGS to help people get to know their neighbors. This is especially important for residents with disabilities, who see their neighbors as key support in case of emergencies, as well as residents in NYCHA who want other local residents to better understand their experience.

“We need more spaces [where] we’re being informed and being taught. Someone can come and realize, ‘Maybe I don’t live in public housing, but I can sympathize with my neighbor because there’s a struggle.’”

— PARTICIPANT, FIFTH AVENUE COMMITTEE

A blue-tinted photograph showing two women, one younger and one older with glasses, looking intently at a document or book they are holding together. The image has a grainy, high-contrast texture.

“If you’re White, you don’t have problems with repairs. If you’re White and your lightbulb is out, they come and fix it. They treat us differently [because] we don’t speak English and we don’t know the country.”

— PARTICIPANT, MINKWON CENTER

WHAT WE LEARNED:

fighting discrimination

More than 50 years after the Fair Housing Act was passed, many New Yorkers still face discrimination when it comes to finding and maintaining their homes.

Recognizing that unequal treatment in the housing market takes many forms, we asked Community Conversation participants to share examples of personal housing challenges and how they navigate them. We also shared information on tenants' rights and resources to combat discrimination.

To address varied housing challenges, it is essential for the City to understand exactly how they play out, what forms discrimination takes, and where there are gaps in fair housing enforcement. The City will use this information to coordinate with other agencies on specific policy recommendations that meaningfully enforce prospective renters' and homeowners' rights.

COMMUNITY CONVERSATION ACTIVITY

housing challenges in the lives of new yorkers

In each Community Conversation, we invited participating residents to share personal experiences with housing discrimination and other housing challenges, including where they go for help. To ensure residents understood their fair housing rights and legal protections, we started the discussion with some example scenarios.

Across the 62 Community Conversations, experiences related to these four scenarios were discussed most frequently:

1. Challenges related to repairs and poor conditions
2. Discrimination during the housing search process based on race or another characteristic
3. Discrimination based on legal source of income, including using a Section 8 Housing Choice Voucher or City program to pay for rent
4. Discrimination based on children or plans to have children in the future

Housing discrimination remains a major challenge for New Yorkers.

Participating New Yorkers shared detailed accounts of discrimination by landlords, brokers, and other real estate professionals when trying to find housing, illustrating that discrimination is still a widespread practice that limits housing options.

Despite legal protections, residents reported facing explicit discrimination when looking for housing for themselves and their families. Residents also shared a range of indirect or masked forms of discrimination. Landlords and

brokers leave calls unanswered, provide incorrect or misleading information about apartment availability, or use inconsistent fees, credit checks, or income thresholds to limit who has access to housing. Discrimination is especially challenging for residents with multiple characteristics protected by fair housing law—for example, people of color with children trying to use rental assistance, or seniors with a disability and limited English proficiency.

“I am Black. I was filling out apartment applications and I was making a good amount of money. The application was filled out, but I didn’t fill out race. When I would check ‘Black’ on the application, I wouldn’t hear anything. So when I got to the apartment, I saw the expression on the landlord’s face, and then I would hear every excuse under the sun: needed more proof of income, work, and so on. You start to give up. I would come with money in my hand to try and show them I was reliable. You feel it, you know the racial discrimination exists, but it can be incredibly hard to prove.”

—PARTICIPANT, NEIGHBORS TOGETHER

“We tried to buy a house. My husband agreed with the owner of the house about everything, but when the owner saw me, and saw my hijab, he canceled the deal and refused to sell us the house.”

—PARTICIPANT, ARAB AMERICAN ASSOCIATION

“I wanted to pursue a housing lead but the broker said she would not deal with me after I disclosed that I had a voucher. She had been nice before, but after that she stormed out.”

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

Fighting discrimination also means fighting the unequal treatment of tenants.

Fair housing enforcement often focuses on the search for housing, but New Yorkers made clear that discrimination and unfair treatment also occur frequently outside of the housing search process, in interactions with landlords and management as a tenant. Residents shared experiences of mistreatment that include poor or no repairs, racist comments, overcharged rent, sexual harassment, physical violence, or intimidation—including landlords threatening unjustified calls to the police or Child Protective Services.

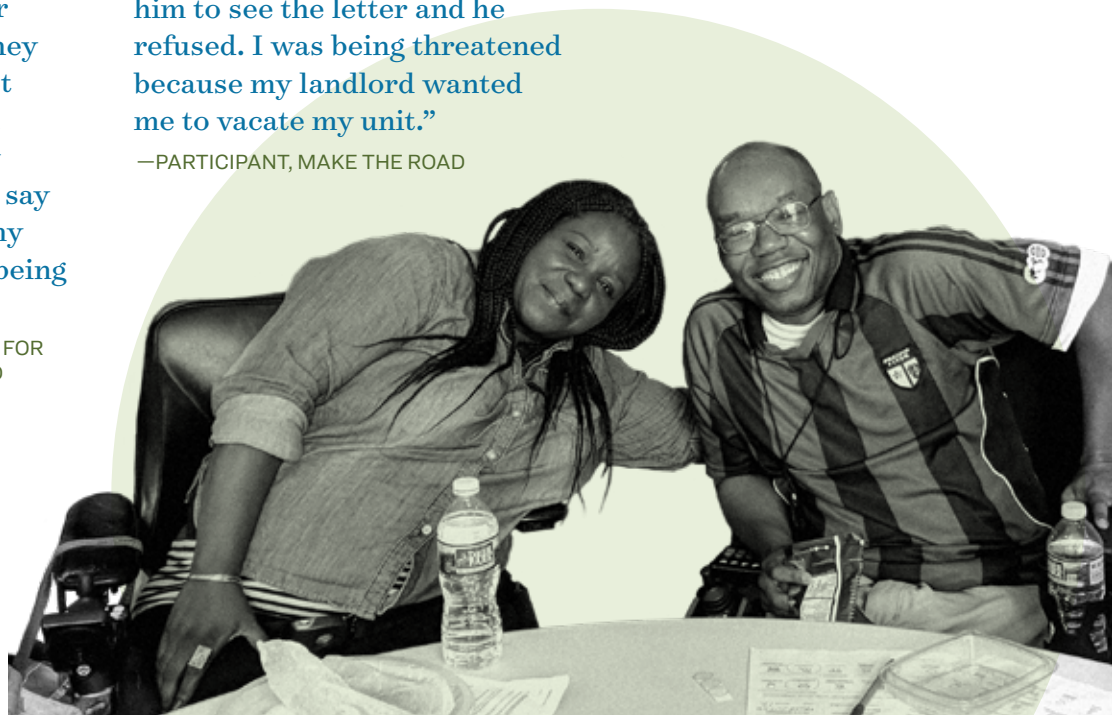
Residents reported that they are often targeted because of their identity—they are a person of color, undocumented, transgender, a single-mother, a voucher holder, a senior, or someone with a disability. In many instances, there was a clear connection to fair housing protections. Harassment also came up as a tactic used to evict or disempower residents in naturally affordable or rent-stabilized units.

“Twice I gave my management proof of DRIE [Disability Rent Increase Exemption program, which is available to people with disabilities in rent-regulated and other eligible apartments] and they tried to intimidate me. I got a notice saying that I owed them \$2,000. I have all my paperwork and receipts to say that I am compliant with my rent. I know that I am not being treated well.”

—PARTICIPANT, BROOKLYN CENTER FOR INDEPENDENCE OF THE DISABLED

“My landlord told me that he received a letter that ICE [US Immigration and Customs Enforcement] was coming to inspect all apartments. I asked him to see the letter and he refused. I was being threatened because my landlord wanted me to vacate my unit.”

—PARTICIPANT, MAKE THE ROAD



Stigma and bias are especially challenging for residents using government housing programs.

Many participants shared how they face stigma living in NYCHA or using rental assistance and how their association with these government programs heightens the discrimination they face in the housing search process. The experiences of participants illustrate how negative bias about poverty,

often reinforced by racism, can limit residents' access to housing and other opportunities. Many described feeling that landlords, brokers, neighbors, and sometimes even case managers and support staff working for the City treat them like criminals.

“I live in a shelter, and we called and called and nobody takes vouchers. They think because you're homeless you're dirty and uneducated, and you'll bring insects and roaches. They think you can't hold a job. A voucher has the stigma of poverty.”

—PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

“What I don't like about affordable housing is the stigma that you get. Especially as a woman of color you have to rise above it, and you can't always do that. You go to a real estate [broker] with a voucher and they turn you away. It's not fair that I walk in to a place and I'm Black, and the woman next to me is White, and I'm treated like a criminal.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

“When we moved, the landlord told us he would not take any vouchers or any kind of government subsidy. He said he didn't want ‘those kinds of people here.’”

—PARTICIPANT, MAKE THE ROAD

“People should look at NYCHA residents and see people as people. We are working and contributing to the community.”

—PARTICIPANT, HPD-LED CONVERSATION IN SOUTH BROOKLYN

Enforcement processes often leave residents feeling powerless.

Many participating residents expressed that the power dynamic between tenants and landlords leaves them feeling trapped and helpless in the face of discrimination and harassment. Many choose not to report bad behavior because they fear retaliation or have concerns about finding a new home with the limited affordable housing options in New York City's competitive market. Tenants facing mistreatment often compromise by putting up

with subpar conditions or abusive landlords, roommates, and neighbors.

Residents who reported taking action often found enforcement processes to be slow, time consuming, and confusing. Furthermore, residents shared concerns that even if they successfully win in Housing Court or get the City to impose a fine, the consequences are too minimal to meaningfully change how landlords do business.

“We called 311 for heat and hot water but it doesn't really work. They won't return your call until two to three weeks down the line. There's very poor communication, and we don't know what's happening right after we call. There's no acknowledgement that they received the complaint.”

—PARTICIPANT, FLATBUSH DEVELOPMENT CORPORATION

“What is the purpose of the Fair Housing Act if there is such a bureaucratic process to go through that it does not benefit the person who needs help? I was living in an apartment and had a stroke. I couldn't walk. Insurance gave me a motorized wheelchair, but I couldn't get it into the apartment because it was not handicap accessible. I went through a lot of court procedures, spoke to lawyers. In the end, it was the landlord's discretion because if he wanted to sell the building, the ramp could impact the cost. The court was going back and forth. I got fed up and just gave up. It seems like they know that people will get tired of fighting.”

—PARTICIPANT, NEIGHBORS TOGETHER

RESIDENT IDEAS

IMPROVING FAIR HOUSING ENFORCEMENT

EXPAND PROTECTIONS

so that criminal background, credit score, and Housing Court records do not serve as barriers to accessing housing. There were also calls to protect residents who do report from retaliation by landlords.

EXPAND RENT

CONTROL to ensure the private market works for low- and moderate-income New Yorkers. There were calls for universal rent control, the expansion of existing rent laws, and stronger protections for current rent-regulated apartments.

FOCUS ON PROACTIVE

ENFORCEMENT to ensure accountability and oversight, taking the burden off of tenants to report bad behavior and pursue justice. Ideas include randomized inspection protocols, increased fair housing testing, and affirmative legal action by government against landlords. The call for proactive enforcement was especially prevalent among residents using rental assistance, who feel they have no backing to ensure programs like Section 8 Housing Choice Vouchers and City-administered programs like CityFHEPS would be accepted by landlords.

INVEST IN COMMUNITY-BASED EDUCATION

so that residents, local organizations, and frontline government staff know tenants' rights and how to take action. When participating residents reported victories on fair housing and tenant protections, it was always because of the help of a dedicated community-based organization.

INCREASE PENALTIES

for bad actors, including higher fines and stricter consequences for landlords and other real estate professionals who violate fair housing law, harass tenants, and fail to make needed repairs.

"I think local governments have to do more to protect tenants. There have to be real penalties for landlords who intentionally harass and abuse tenants in their buildings."

—PARTICIPANT, MAKE THE ROAD

"I found Make the Road and got access to a lawyer. I was taught my rights and realized that if I gave up my rent-stabilized apartment, I likely would not be able to find another one. I decided to stay and fight my landlord. We won."

—PARTICIPANT, MAKE THE ROAD

IMPROVE HOUSING

COURT to ensure access to justice. Residents shared a deep mistrust of the Housing Court system and see it as a tool used by landlords to evict tenants, rather than a place for residents to fight for their rights. Suggestions for reform include education for residents on how to prepare for and navigate court, free representation for cases being brought against landlords, and addressing inefficiencies in the system that lead to drawn-out cases demanding time and persistence that many residents cannot afford

"I went and met with [the NYC Human Rights Commission]. But I did not pursue a case because I did not want to create issues. I would have had to show up many times, and it is hard to fight a case."

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

REGULATE BROKER AND OTHER RENTAL APPLICATION FEES

to ensure they are not a barrier to low-income tenants seeking housing. This could include reimbursement programs for fees and security deposits, as well as opportunities to better train and incentivize brokers to work with voucher holders, people with disabilities, and other populations who routinely face discrimination.

"There are application fees for apartments, and some people may not have [the money]. I'm trying to get an apartment, but it's hard and you don't get your fee back [when you're not approved]."

—PARTICIPANT, NYC FAMILY JUSTICE CENTER

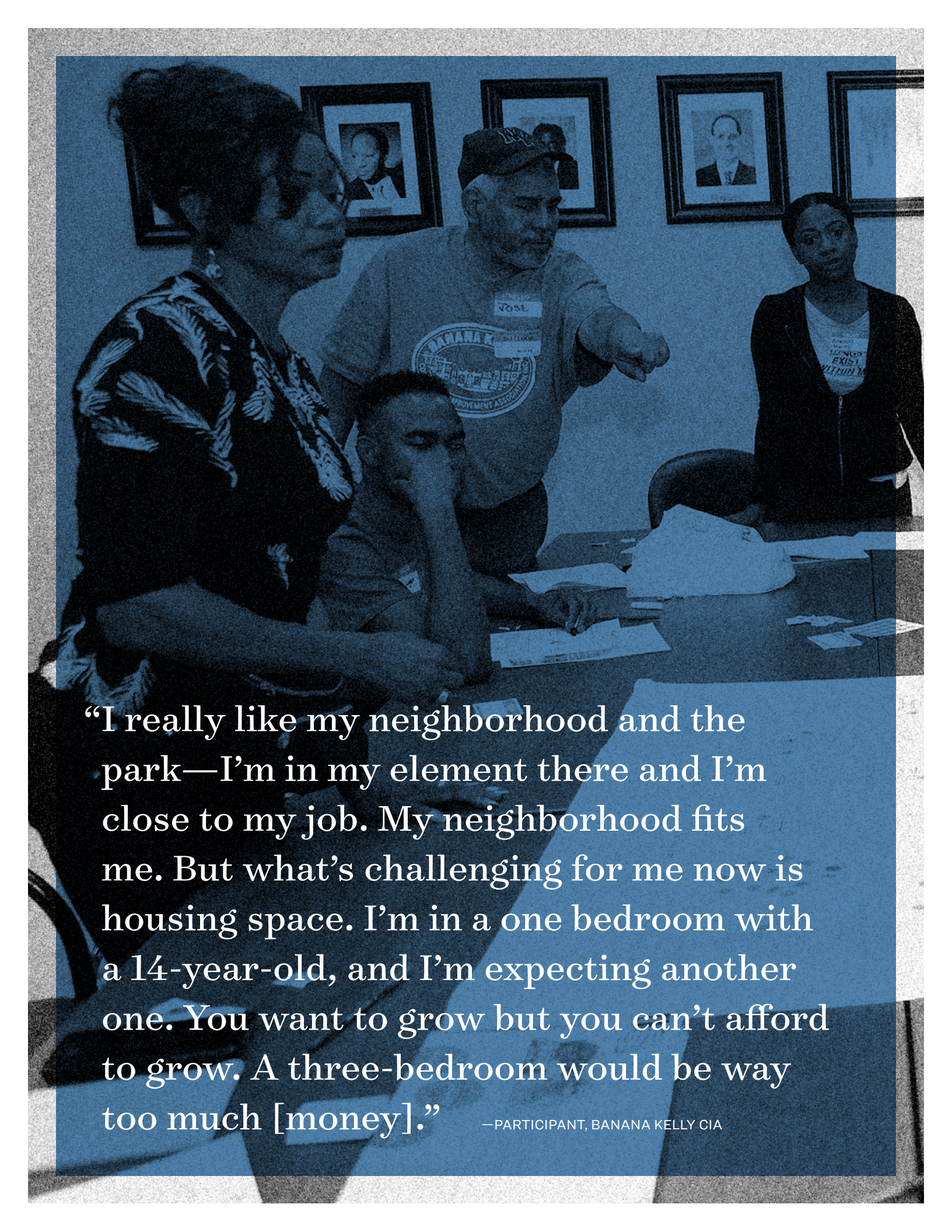
STREAMLINE PROCESSES

to ensure tenant complaints are efficiently addressed, including expedited timelines as well as better communication during the process. Specifically for 311, there is a lot of confusion and concern about whether complaints are actually being received and limited clarity on what residents need to do in order to move the process forward.

“[Many immigrants] are okay to have the bare minimum. They don’t realize that housing quality is important and they deserve it. Many stay in crappy conditions and don’t know how to advocate for themselves.”

—PARTICIPANT, MEKONG NYC



A photograph of a group of people in a meeting room. A man in the center, wearing a grey t-shirt with a 'BANANA KELLY' logo and a baseball cap, is pointing at a document on a table. To his left, a woman in a patterned top is looking at the document. To his right, another woman is looking towards him. The room has framed portraits on the wall. The image is overlaid with a blue tint.

“I really like my neighborhood and the park—I’m in my element there and I’m close to my job. My neighborhood fits me. But what’s challenging for me now is housing space. I’m in a one bedroom with a 14-year-old, and I’m expecting another one. You want to grow but you can’t afford to grow. A three-bedroom would be way too much [money].”

—PARTICIPANT, BANANA KELLY CIA

WHAT WE LEARNED:

promoting housing choice

The City is seeking to increase opportunity for all New Yorkers by promoting housing choice: the choice to move into a different neighborhood or the choice to stay in a neighborhood, even as it changes.

The Community Conversations surfaced detailed information about why New Yorkers live in their neighborhoods and where they may want to move. The experiences shared by residents illustrated a clear lack of choice for low income New Yorkers, since the majority reported ending up in neighborhoods due to forces outside of their control, such as affordability, discrimination, or government housing programs. This information will help the City develop policies to better support New Yorkers in making the housing choice that is best for themselves, their families, and their communities.

DO YOU WANT TO STAY IN YOUR CURRENT NEIGHBORHOOD, OR MOVE TO ANOTHER ONE?

Stay: 55%

Move: 45%

COMMUNITY CONVERSATION ACTIVITY

what's impacting neighborhood choice?

In each Community Conversation, residents selected the reasons why they currently live where they live, whether they want to stay or move, and the key tradeoffs and reasons driving that choice.

WHY DO YOU LIVE IN YOUR CURRENT NEIGHBORHOOD?

Top answers:

“Affordability” or “Availability of subsidized housing” (NYCHA, housing supported by HPD)
“Ease of transportation”
“Family and community” or
“Sense of belonging”

FOR THOSE WHO WANTED TO STAY, WHAT IS THE MAIN REASON FOR STAYING IN YOUR NEIGHBORHOOD?

Top answers:

“Family and community” or “Sense of belonging”
“Affordability” or “Availability of subsidized housing” (NYCHA, housing supported by HPD)

FOR THOSE WHO WANTED TO MOVE, WHAT IS THE MAIN REASON FOR MOVING TO ANOTHER NEIGHBORHOOD?

Top answers:

“Environment” (green space, air quality)
“Family and community” or
“Sense of belonging”
“Housing conditions” (housing quality, landlord relationship, apartment size)
“Safety”

Few New Yorkers feel like they have meaningful options when choosing a home or neighborhood because of the high cost of housing.

Most residents who participated in the Community Conversations are low-income and reported that the high cost of housing in New York City dramatically limits their choice of homes and neighborhoods. Instead, residents reported compromising with poor conditions and overcrowding, or limiting their housing search to neighborhoods that feel unsafe or have underperforming schools.

Residents also shared that they rely heavily on government housing programs, including the shelter

system, in order to survive in a market that feels too expensive. Housing choice is particularly limited for seniors and people with disabilities, who often need homes that are accessible and affordable on a fixed income, like Social Security. Affordability is a heightened concern for single parents, those involved with the criminal justice system, LGBTQ individuals, undocumented immigrants, and other residents earning low wages or facing discrimination in the job market.

“Affordability dictates everything. The conversation with clients is about where they can afford to live, and then we plan for safety afterwards. Same with school quality—my clients would love to live in a place with good school quality, but they can’t afford it. There is a hierarchy of needs. You can’t even get to other needs or wants, because first you have to live in a place you can afford.”

—SERVICE PROVIDER,
ANTI-VIOLENCE PROJECT

“My coworker says, ‘Why would anyone want to live in the projects?’ And I say, ‘Where else am I going to live?’ My mom is disabled so she can’t work and also she has a lot of us. It’s hard. We would be homeless otherwise. People live where they can afford to live.”

—PARTICIPANT, CENTER FOR
COURT INNOVATION

A lack of housing choice impacts the most fundamental details of New Yorkers' lives.

For many New Yorkers, the lack of housing choice has a fundamental impact on their lives—from day-to-day behaviors to planning for the future. Residents shared the high stress and sacrifice that results from having little or no access to safe, quality, and affordable housing:

- A couple using a housing voucher could not find a quality apartment with enough room, so they postponed having children.
- A single mother got pneumonia because of poor heating in her apartment but was afraid to make a complaint because she was undocumented.
- A young immigrant moved five times in three years—once living in a windowless basement—in order to afford rent.
- A transgender person feared for their safety because they could not receive gender-affirming surgery since they did not have the required stable housing available for post-surgery care.
- In order to prepare fresh food for her family, a voucher holder reported that she began barbecuing on the sidewalk outside her apartment after the landlord refused to fix her stove.
- A disabled 89-year-old took over an hour to get up the stairs each day because their rent-stabilized building had no elevator but was all they could afford.

In addition to housing challenges, many residents reported regularly travelling far distances because their neighborhood lacks quality employment, schooling, doctors, or groceries.

“In Far Rockaway you’re so isolated at times. In the snowstorm we had, the buses and trains weren’t running, and you’re stuck here. During a storm like Sandy, you’re really stuck. I want to move for a better life for the kids.”

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM



Family, community, and sense of belonging play a major role in where people live.

New Yorkers from across Community Conversations stressed the importance of living near family and community. These local relationships can serve as key support systems—neighbors provide childcare, local businesses offer free food during hard times, and houses of worship support job and apartment searches. Recent immigrants, in particular, rely on family and community as they build a new life in New York City, and many have limited awareness of housing options beyond their immediate neighborhood.

Living near family and community also contributed to residents

feeling safe and welcomed in their neighborhoods. Many residents of color shared concerns about discomfort, discrimination, or mistreatment when living in predominately White areas, and prefer to live near family members or in more diverse communities where they have a stronger sense of belonging. Residents of color also reported that they feel they have fewer options because of past and current norms about who is welcome where and how neighborhoods are monitored and policed.

“I want to stay in Bay Ridge because I want to be connected to my community, and when I am sick there will be someone here to be with me.”

—PARTICIPANT, ARAB AMERICAN ASSOCIATION

“We used to live in Manhattan, but my mom and dad wanted more diversity. They wanted me and my brother to grow up somewhere where I wouldn’t be treated differently. That’s why I live in Jamaica.”

—PARTICIPANT, ASIAN AMERICANS FOR EQUALITY

“White people can move to wherever they want and people of color can only move between East New York and the Bronx.”

—PARTICIPANT, FIFTH AVENUE COMMITTEE

Government housing programs can have a limiting impact on neighborhood choice.

Government housing programs—including NYCHA, rental assistance programs, supportive housing, and HPD-funded housing—provide positive, even transformative, opportunities for many New Yorkers. Many residents described these programs as a pathway out of homelessness, or a chance for true housing stability. However, residents also reported that participating in these programs can mean losing the opportunity to choose their neighborhood—prioritizing an affordable apartment, regardless of location. This can mean moving away from friends and family, or moving into neighborhoods with fewer resources.

“The City’s voucher is so limiting. You can’t leave the city, and also the amount of the voucher keeps your search incredibly closed. There is almost nothing but rooms available in the voucher price range. Now the cost of rooms has gone up to the point that the voucher will barely cover that. The agencies that make these programs do not support them. They make [the vouchers] worthless.”

—PARTICIPANT, NEIGHBORS TOGETHER

Once they moved in, some participants reported feeling stuck with no pathway for leaving housing programs—particularly NYCHA—because of the lack of affordability in the housing market. Designed to provide more choice in the housing market, rental assistance programs can also be challenging to use. Residents reported feeling “quarantined” in certain neighborhoods due to discrimination, voucher payment limits, and red tape for voucher holders as well as landlords.

“The first apartment I got [through HPD’s housing lottery] was in Manhattan. I didn’t have a choice about it because it was subsidized housing. I had to go where the housing was due to accessibility and affordability. So, I had to break off everything I had in Brooklyn and start over with friends, doctors, and everything. I did give that up but I got more in return.”

—PARTICIPANT, BROOKLYN CENTER FOR INDEPENDENCE OF THE DISABLED

“I can’t leave NYCHA. Right now, at end of pay week, I have \$200-\$300 after rent. And if I moved, I would only have \$5 left. I would go hungry in a nice apartment.”

—PARTICIPANT, NYCHA PUBLIC HOUSING

“The only apartments available are in the Bronx, which is a very desolate place. Why do they want to place all the poor people in the Bronx? I want more Section 8 listings available where I can find them. Right now, giving me a voucher is like giving me the key to a Volkswagen and saying, ‘Go find the car!’”

—PARTICIPANT, SECTION 8 HOUSING CHOICE VOUCHER PROGRAM

RESIDENT IDEAS

IMPROVING HOUSING PROGRAMS

INVEST IN QUALITY STAFFING, SERVICE DELIVERY, AND CUSTOMER SERVICE

across all programs to ensure that participating residents and landlords—in the case of rental assistance programs—receive timely, accurate, and consistent support.

“How quickly you connect to appropriate housing should not depend on how lucky you are, or how familiar your housing specialist is with the system. There should be appropriate staffing and the right ratio of 1-on-1 time in a regular way.”

—SERVICE PROVIDER, CENTER FOR COURT INNOVATION

REDUCE COMPETITION BETWEEN GOVERNMENT PROGRAMS

to eliminate incentives for landlords to favor one form of government assistance over another.

“The landlord has a shelter program in his building that pays more rent, so he’s trying to kick out the people in the non-shelter program. Some people left, but I decided to stay. Now they have begun to harass us.”

—PARTICIPANT, BANANA KELLY CIA

EXPLORE OPPORTUNITIES TO MAKE GOVERNMENT PROGRAMS MORE AFFORDABLE

by advocating to reduce rental contributions in government housing to less than 30-35% of gross income, creating more opportunities for residents with disabilities to deduct medical costs, and expanding emergency rental and utility assistance programs that help residents avoid eviction.

“I don’t want to be rent burdened. I want to have a life. I want to have disposable income at the end of the month. I want to do things after I pay my bills. That’s your ability to buy food, buy clothing, and not live paycheck to paycheck.”

—PARTICIPANT, BANANA KELLY CIA

IMPROVE LANGUAGE AND DISABILITY ACCESS

to ensure all residents can apply for, navigate, and live comfortably in government-assisted housing.

“After filling out the Housing Connect form [for HPD’s housing lottery] and marking that I was deaf, I showed up to the interview for the apartment and no interpreter was provided.”

—PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

ENSURE RESIDENTS OF GOVERNMENT HOUSING PROGRAMS FEEL VALUED AND EMPOWERED

in their interactions with government. This includes training and protocols to ensure that stigma, bias, and discrimination are not perpetuated within government agencies. As one resident shared, “stop making people who are not making enough money feel lazy and less of a person.” Another resident in supportive housing talked about her negative interactions with police:

“I want police to be community partners, to protect us. They think that supportive housing is just for people right out of jail and you must accept that there’s crime in the building. They think if you live here, that you should just take it. ‘Didn’t you know what you were getting yourself into?’”

—PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

EXPAND INVESTMENTS IN AFFORDABLE HOUSING

including housing for extremely low-income individuals who have limited options in a high-cost market and in government housing programs. There was also a call for more emergency, supportive, and specialized housing for justice-involved and LGBTQ individuals.

EXPAND MARKETING FOR NEW IMMIGRANTS

to ensure they know about government housing programs and how to apply, including clarifying eligibility for undocumented immigrants.

“Since I’m a new immigrant, I was not aware of subsidized housing or temporary shelters.”

—PARTICIPANT, CHHAYA

MAKE IT EASIER TO APPLY FOR HOUSING

by creating a centralized place to apply for different programs, investing in community-based organizations that connect residents to services, and clarifying the application and waitlist processes.

homelessness and shelters

INCREASE THE QUALITY AND SAFETY of shelters to ensure that all residents can successfully access the support they need without fear of violence, especially for transgender and gender nonconforming individuals.

REFORM SHELTER PLACEMENT POLICY to keep families in their community and give impacted residents more agency to choose where they live. Residents reported that proximity to community and social networks helps students stay in school and makes it easier for shelter residents to secure permanent housing back in their former neighborhood.

“In shelter, people have no choice. They will not let you go where you want to go, and will not let you transfer. The system is so inefficient and people don’t listen or understand. You are not looked at as an individual.”

—PARTICIPANT, NEIGHBORS TOGETHER

STREAMLINE THE PROCESS to get people into housing faster with less red tape, especially for residents involved with the criminal justice system and for LGBTQ individuals who reported unique safety concerns in the shelter system.

affordable housing programs

REWORK ELIGIBILITY REQUIREMENTS TO HAVE LESS RIGID INCOME CUTOFFS, especially for certain populations with high housing needs, such as people with disabilities. One resident shared how her friend with a mobility disability was \$5 away from the income threshold and was denied an accessible apartment.

CONDUCT TIGHTER OVERSIGHT OF LEASING, including providing a hotline to report perceived discrimination and ensuring that limited accessible apartments are awarded to people with disabilities on the first and subsequent rent-ups.

PROVIDE MORE OPTIONS AND LARGER UNIT SIZES FOR UNIQUE HOUSEHOLD ARRANGEMENTS like large or intergenerational families and individuals with in-home caretakers, including seniors and people with disabilities.

ADD PREFERENCES IN HPD’S HOUSING LOTTERY FOR CURRENT NYCHA RESIDENTS AND RESIDENTS USING RENTAL ASSISTANCE to support mobility and choice:

“The City should provide preferences for NYCHA residents to move to other affordable units if they want to. Most new housing is not affordable for extremely low-income people living in NYCHA.”

—PARTICIPANT, FIFTH AVENUE COMMITTEE

NYCHA

ADDRESS POLICIES RELATED TO FAMILY RE-ENTRY FROM THE CRIMINAL JUSTICE SYSTEM.

Many residents shared that it is unfair to permanently exclude residents based on low-level drug offenses and to punish families by not allowing the return of loved ones.

“During the crack epidemic they made the ‘zero tolerance’ rules. They wanted parents to sign a probation paper saying you wouldn’t let your kid back into the apartment if they smoked even a single joint. Let’s bring back people who were kicked out of NYCHA for drug offenses now that marijuana is decriminalized in New York City.”

—PARTICIPANT, FIFTH AVENUE COMMITTEE

EMPOWER NYCHA RESIDENTS

through improved tenant leadership structures and education, expanded right to counsel, and better utilization of NYCHA outdoor and community spaces.

REFORM NYCHA ADMISSIONS, TRANSFER, AND SUCCESSION PROTOCOLS

to streamline processes and give residents more choice and agency, including changes to borough-wide preferences that currently do not give residents the option to live near family and community.

PROVIDE MORE SUPPORTIVE SERVICES FOR NYCHA TENANTS

—including residents with mental health challenges, survivors of domestic violence, and formerly homeless households—to ensure they have the care they need to thrive and so that fellow residents do not serve as de-facto case workers.

“Unfortunately, there is usually an adverse reaction to mental health issues when you don’t have proper responses in place. Why would they move someone into the apartments without social assistance, and they have one of their attacks? If there’s no social support, it can disrupt the whole building.”

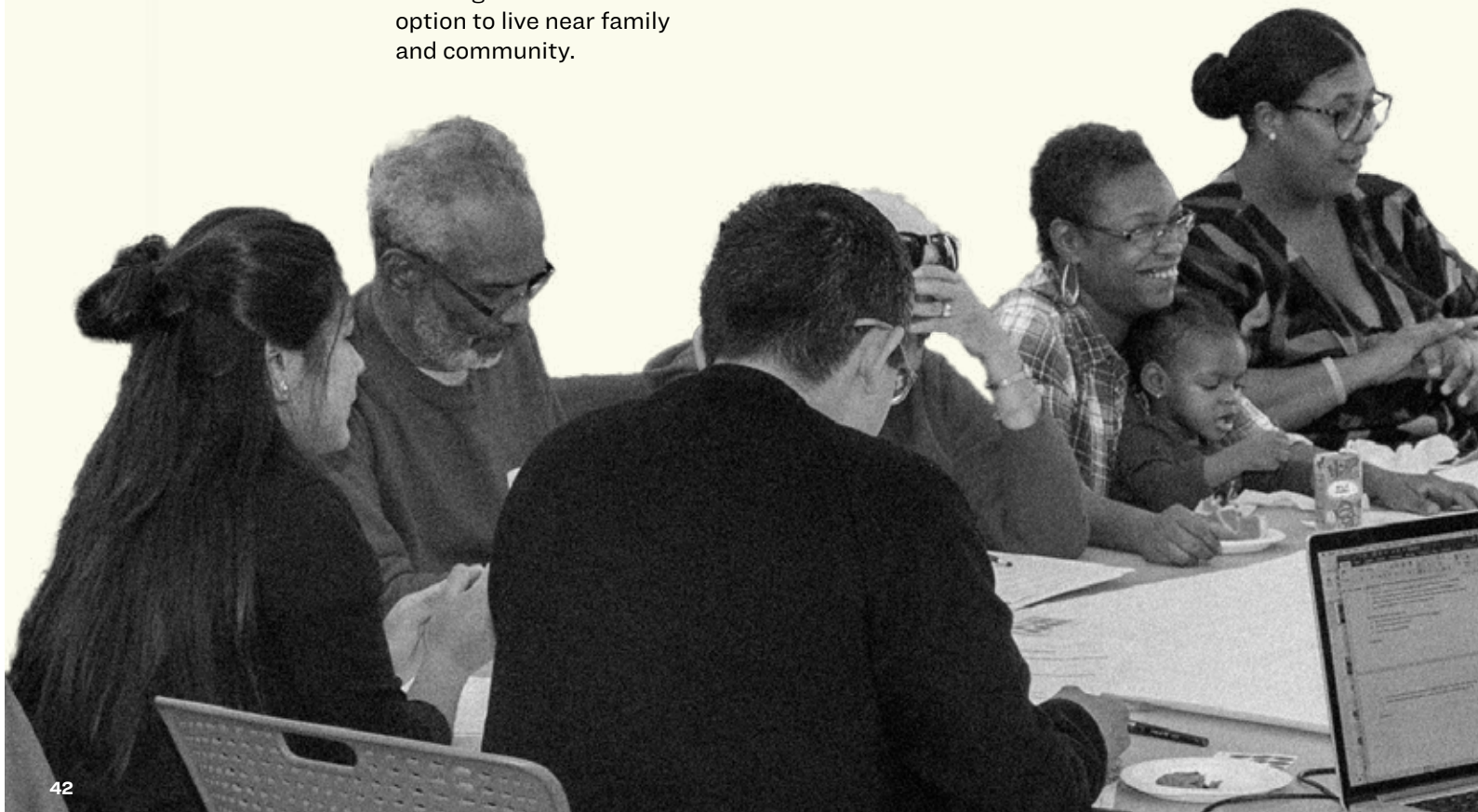
—PARTICIPANT, NYCHA PUBLIC HOUSING

IMPROVE BUILDING CONDITIONS AT NYCHA

and provide timelier, more effective repairs to ensure residents can live in safe and quality housing.

“I have mold in my apartment and I’ve been living in NYCHA for four years. Every time they come they just paint and it comes back. I was given a ticket and they were supposed to show up. I stayed home two days and they never came.”

—PARTICIPANT, CENTER FOR COURT INNOVATION



rental assistance programs

IMPROVE THE MARKETING OF VOUCHERS AND RENTAL ASSISTANCE PROGRAMS TO LANDLORDS

to increase the supply of participating properties, including government outreach and coaching for residents using rental assistance programs on how to best present their program to potential landlords.

“They say, ‘No programs. No vouchers.’ Actually, that’s kind of strange that they don’t want that. That’s guaranteed rent. They say because the City takes too long and they feel they’re going to get undesirable tenants. We need to better market ourselves.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

IMPROVE THE SUPPORT OFFERED IN THE HOUSING SEARCH PROCESS

, including expanding onboarding programs, more targeted coaching on neighborhood choice, and assistance identifying and reporting source of income discrimination.

“People get vouchers for housing and do not know what to do with them. They do not have any support in finding homes with their voucher. When they work with brokers, they often face discrimination because they are young, homeless, and LGBTQ. They don’t know how to look for housing on their own—that type of support would be helpful.”

—SERVICE PROVIDER, ALI FORNEY CENTER

REFORM HARMFUL PROTOCOLS THAT CAN HURT RESIDENTS USING RENTAL ASSISTANCE

, including time limitations during the housing search process and inspection protocols for voucher holders. Many participants believe the current inspection protocol does little to ensure quality housing conditions and fails to hold landlords accountable for repairs, instead putting the onus on tenants to go through eviction proceedings or quickly secure new housing.

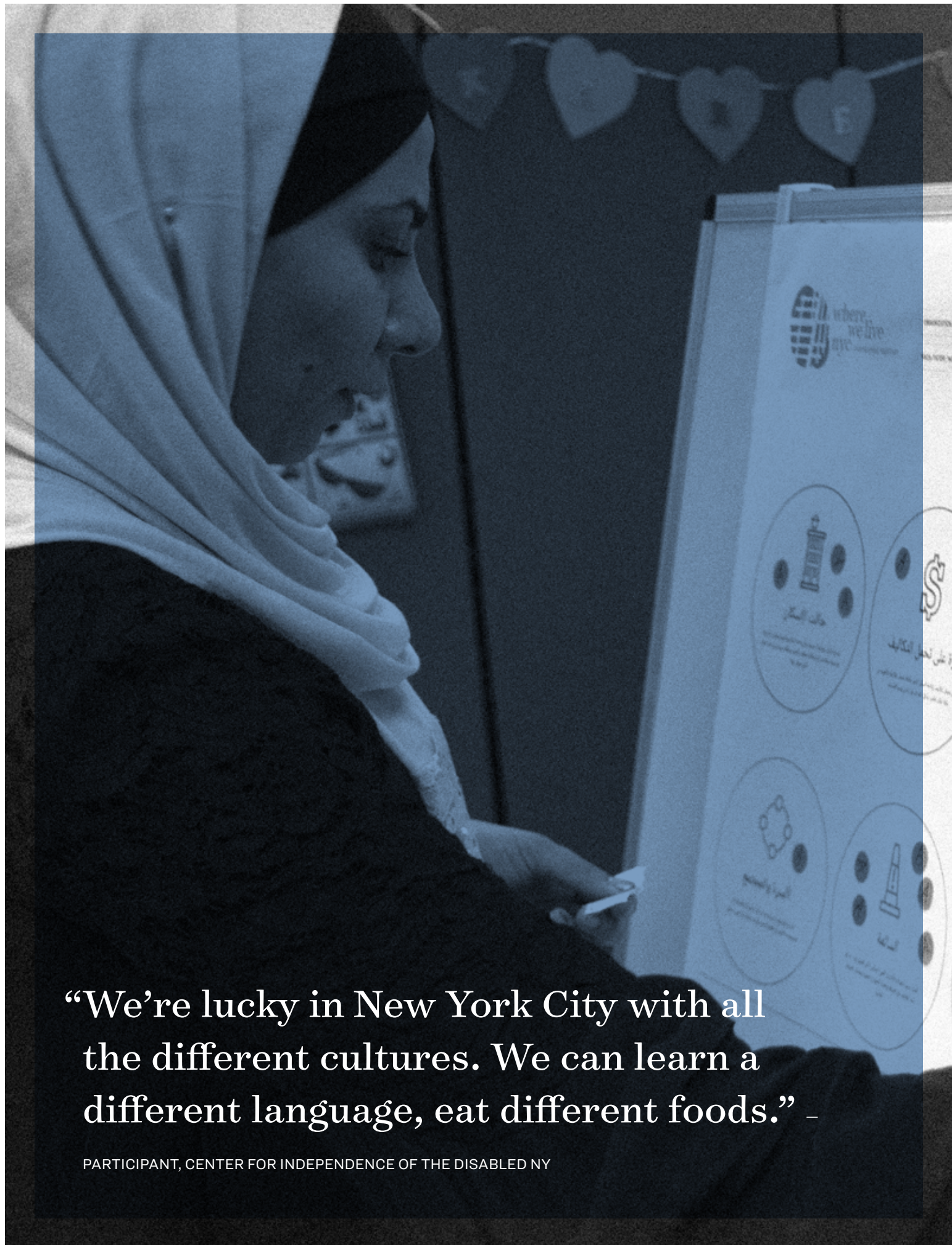
MAKE RENTAL ASSISTANCE PROGRAMS MORE COMPETITIVE

by increasing payment amounts, promoting opportunities for using rental assistance programs to move out of New York City, removing the time-bound nature of City rental assistance, or adding more incentives for lease renewals.

“The City needs to strengthen the voucher program. The amount of the voucher is so low it is ineffective. There are no apartments in the price range at all. I have been looking for over a year and a half, and the only landlords and brokers in my price range are predators.”

—PARTICIPANT, NEIGHBORS TOGETHER





“We’re lucky in New York City with all the different cultures. We can learn a different language, eat different foods.” –

PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

WHAT WE LEARNED:

increasing access to opportunity

From jobs and transit to cultural institutions and universities, New York is a city of opportunity.

However, there exist deep disparities in everything from wealth to life expectancy as a result of historic and present-day injustices.

During neighborhood-based Community Conversations, New Yorkers discussed how forces like gentrification, integration, and housing choice affect their access to resources and opportunity. They also shared what makes a neighborhood great.

This feedback will inform the City's policy approach as it works to provide investments and resources to neighborhoods for residents to thrive.

COMMUNITY CONVERSATION ACTIVITY

what makes a neighborhood great?

In each Community Conversation, residents shared their favorite neighborhood and the reasons why they want to live there. Here are some top themes that emerged when participants discussed what makes a neighborhood a good place to live:

1. **LOCAL RELATIONSHIPS**—including friends, family, and friendly neighbors
2. **PERSONAL HISTORY AND FAMILIARITY**
3. **EASE OF GETTING AROUND**—including subways, buses, bikes, parking, and walkability
4. **ACCESS TO CRITICAL SERVICES**—including convenient employment, healthcare, and community-based service providers
5. **GOOD FOOD AND RESTAURANTS**
6. **ACCESS TO PARKS, GREEN SPACE, AND NATURE**
7. **DIVERSITY OF RESIDENTS**
8. **SAFETY**—including LGBTQ-friendly spaces
9. **QUIET**
10. **CULTURE**—including history and atmosphere

New York City offers unparalleled opportunities.

Many participating residents discussed how New York City offers them opportunities that they could not find living anywhere else. Residents celebrate the strong public benefits, access to good education, and welcoming neighborhoods filled with diverse cultures and identities. From LGBTQ individuals to immigrants, residents came to

New York City to find acceptance and build a better life. For longtime residents, being a New Yorker is a part of their identity and they have no desire to call another place home. New York City's unique opportunity and diversity motivate residents to stay and contribute to making their neighborhoods better.

“New York City is the only city that has a 24/7, 365 days a year transit system.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

“Because of my color as a Black male, I might not be safe in other places outside of New York.”

—PARTICIPANT, NEIGHBORS TOGETHER

“Growing up in the segregated South, I was always taught in my mother and father’s house. It was education, but it was nothing like the free education at City College. New York is opportunity. I came from the South and I worked my way up for 30 years. They don’t have that in the South. Here if you want something bad enough, you can work hard and get it. God bless New York City.”

—PARTICIPANT, SAGE ADVOCACY & SERVICES FOR LGBT ELDER



Deep inequalities exist in how New Yorkers access opportunity.

Participating residents discussed in great detail how investments from government and the private sector may vary dramatically across neighborhoods. Many shared how historic and present-day racism impact who has access to opportunity perceived that neighborhoods with more White residents often have more wealth, investment, and higher-quality amenities.

New Yorkers also discussed how neighborhood change, gentrification, and the influx of wealthier residents

quickly shift the landscape of opportunity in a given neighborhood, bringing amenities and attention to areas—primarily communities of color—that have been long neglected. In some instances, residents reported that these changes lead to better amenities for everyone. But often there is a more complex dynamic, where gentrification can lead to displacement, fear of displacement, and unequal access to opportunity for different residents, even within the same neighborhood.

“I live in Queens. All the other boroughs are not taken care of as much as Manhattan. I want the City to care about this neighborhood as much as I do.”

—PARTICIPANT, CENTER FOR INDEPENDENCE OF THE DISABLED NY

“Even as our neighborhood gets more diverse, we are not getting the same things, especially in NYCHA. On our side, where the projects are, there’s nothing developed over there. There are no benches. There’s not enough light. There are no trees planted there. The ‘beautification’ projects and the development of new green space are one-sided.”

—PARTICIPANT, HPD-LED CONVERSATION IN SOUTH BROOKLYN

“When neighborhoods are more diverse, they become safer. More police come in and things start to get cleaned up. You see the streets getting paved, empty stores filling with businesses, better garbage pickup. At the same time, they also make it more expensive. It makes life harder for the people who lived there first because they start to get priced out. I love all the changes that happen to the neighborhood but I want to be able to enjoy them. I don’t want to have to leave once things start getting nicer.”

—PARTICIPANT, NEIGHBORS TOGETHER

a closer look at how New Yorkers experience five key areas of opportunity

TRANSIT AND CONNECTIONS TO OPPORTUNITY

AN ACCESSIBLE AND INCLUSIVE SYSTEM

Residents discussed how they rely heavily on public transit to connect them with jobs and amenities not available in their neighborhoods. However, residents reported that the amount of transit options and quality of transit vary significantly across communities. Many low-income communities in the outer-boroughs reported less frequent and reliable service, even though they often have the longest commutes and highest need to access critical services.

“The Bronx is an under-served borough. For instance this bus right here. Everyone pays the same amount of money to ride the bus, but the bus is never here when it’s supposed to be. I have to wait half an hour. This is an area where everyone needs a bus to go to court or get their benefits. People are paying the same amount as in Manhattan [where there is] better service.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

SUPPORTING UNCONVENTIONAL COMMUTERS

Residents with unconventional work schedules who are commuting outside of traditional office hours are disproportionately low-income residents of color, and many shared concerns about safety and reliability of public transit. One Section 8 voucher holder in the Rockaways was a home health aide with late-night hours. After a few negative experiences where she was followed and harassed waiting for the train late at night, she decided to lease a car in order to get to work safely. However, she explained that the lease is difficult to afford, and as a result she is struggling to keep up with rent.

AN ACCESSIBLE AND INCLUSIVE SYSTEM

Residents with disabilities and seniors called for meaningful accessibility improvements across the transit system, including ensuring elevators at every station, better protocol on buses, and improving Access-A-Ride services and alternatives.

“Access-a-Ride is horrible. I have sat in the snow for an hour waiting for it. I think it’s very unfair that they will wait only five minutes for you, but they can be half an hour or an hour late.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

AFFORDABLE REGIONAL TRANSIT IS KEY TO HOUSING CHOICE

The lack of public transit came up as a barrier when residents discussed moving or accessing resources outside of New York City. Many residents reported being unable to afford a car or rely on local and regional systems to get around.

“I don’t have a car. A lot of New Yorkers don’t. I couldn’t afford a car with monthly insurance. Brownsville is the ghetto but we have all major forms of transportation here. If one thing is not running, you can take something else.”

—PARTICIPANT, CENTER FOR COURT INNOVATION

DIFFERENT PERSPECTIVES ON SAFETY

SAFETY IS ABOUT IDENTITY

Residents discussed being harassed for wearing a hijab or for being openly transgender. Residents of color worry about being unjustly reported to the police in predominately White or gentrifying neighborhoods, and undocumented immigrants fear being picked up by or reported to federal authorities. Survivors of domestic violence have their own calculations around safety, making hard tradeoffs between avoiding their abuser and staying plugged into important local support networks. For many of these residents, access to safety and security never feels easy or guaranteed because of their identity and experiences.

“My [transgender and gender nonconforming] clients have to plan their route for safety when they leave their house. ‘Can I get from home and walk even a block safely?’ One recent client was worried about public transit—being aware of how close they were to the tracks for fear of being pushed. They have slurs written on their apartment doors and mailboxes. Safety is a huge concern.”

—SERVICE PROVIDER, ANTI-VIOLENCE PROJECT

FEELING STUCK IN UNSAFE NEIGHBORHOODS

Many residents reported having to compromise on safety in order to find affordable housing options. This is especially true for NYCHA residents and residents using rental assistance who frequently reported frustration with crime and drugs in their neighborhood.

“I know it’s a bad area, so I try to plan trips for my daughters to show them what else there is. My goal is to save enough money to take them out of the hood, get a better education.”

—PARTICIPANT, NYCHA PUBLIC HOUSING

DIVERGENT VIEWPOINTS ON POLICING

When discussing neighborhood safety, residents were torn. Some called for increased responsiveness and presence from the police, while others shared feeling less safe when police are around. Many residents want more local officers who know the neighborhood, culture, and language.

“I want a community that is safe and free of racial profiling. A place where the police are held accountable and there is also a more amicable relationship between the police and the community. Where police are part of the community.”

—PARTICIPANT, NEIGHBORS TOGETHER

COMMUNITY TIES MEAN SAFER STREETS

At the neighborhood level, many residents discussed how local relationships are critical to their sense of safety:

“I currently live on City Island [in the Bronx]. I moved there three years ago because there had been shootouts where I was before. Now there’s a sense of community with the row houses, and people look out for each other.”

—PARTICIPANT, BANANA KELLY CIA

PERCEPTIONS OF SAFETY DIFFER

Residents also acknowledged that even in the same neighborhoods, different New Yorkers may experience safety differently, often based on race and local relationships.

“I know everyone in my community. I know my block. Safety comes from family and sense of community. When outsiders walk there, they get scared. But I’m scared when other people come in. Safety is not related to police. If the police are present then I get scared. Even when people talk to the police, there aren’t successful outcomes. Racism defines differences in perceptions of safety.”

—PARTICIPANT, MEKONG NYC

UNDERSTANDING HEALTH AND HOUSING

COMMUTE OR COMPROMISE FOR GROCERIES

Some residents discussed having a hard time finding quality and affordable grocery options in their neighborhoods.

“I need to commute out to get the right foods. I shop where the White people shop to get produce and meats because the fresh foods in my neighborhood are not fresh, and probably not safe. Didn’t realize I was sacrificing food sources when I moved here. I feel worse eating here. It’s affordable but I need to be careful about what I buy.”

—PARTICIPANT, NEIGHBORS TOGETHER

CHALLENGES ACCESSING QUALITY AND INCLUSIVE HEALTHCARE

Many residents reported that the medical care in their neighborhoods was subpar. This is often a key concern for seniors, immigrants, LGBTQ individuals, and residents with disabilities who require culturally sensitive, multi-lingual, or specialized healthcare.

“We need better health care for everyone. The options are terrible. The doctors don’t care. I’m in my first trimester and it’s very difficult to find someone good [in my neighborhood].”

—PARTICIPANT, BANANA KELLY CIA

UNEQUAL AND UNSAFE ENVIRONMENTS

Residents called for more equitable sanitation services and green investments across communities, pointing to uneven quality in public spaces, parks, air quality, and cleanliness between and within neighborhoods. Poor sidewalk conditions and building design disproportionately impact people with disabilities, while asthma rates are often higher in low-income communities of color.

“The environment is not a plus. Too many trucks drive down my block, and my kid was diagnosed with asthma.”

—PARTICIPANT, MAKE THE ROAD

POOR HOUSING QUALITY AS A HEALTH HAZARD

Many residents shared experiences with mold or lead in their apartments, or with aggressive renovation practices in their building that border on harassment. Others discussed how broken appliances, plumbing problems, or pests make their kitchens unusable—forcing them to rely on takeout meals, which have negative health and financial consequences.

“I lived in Washington Heights and they turned the gas off one weekend and said it would take six weeks to fix it. Six weeks lasted ten months. They said they would give us a hot plate but didn’t do that either. We had to pay for cooked food for months which is a huge expense.”

—PARTICIPANT, FIFTH AVENUE COMMITTEE

STRESS AND HOUSING INSTABILITY

Residents also discussed the emotional and physical stress associated with challenging housing searches, housing instability, and displacement.

“I went to find an apartment, but they saw my ID and that I was over 70, and they said I was too old. I have cried so many times because I want to stay in America, but nobody wants to rent to me. And my daughter doesn’t have enough space for me.”

—PARTICIPANT, ASIAN AMERICANS FOR EQUALITY

EQUITY FOR THE NEXT GENERATION THROUGH INCLUSIVE, INTEGRATED SCHOOLING

THE SCHOOL-HOUSING CONNECTION

Many participating residents do not have the opportunity to choose housing based on quality schooling. Instead, many compromise: their children attend non-public schools or travel to another part of the city for school. Some expressed interest in moving closer to better schools, but feel limited due to affordability. Many participants did not even realize that school choice existed, or reported being unable to exercise school choice due to limited transportation in their neighborhood.

“The elementary school was not good quality, but I turned out okay. When I went to high school it felt like I was in jail. It still sticks with me, even though I’m past it. If you wanted access to better high school then you had to travel, but school quality was not even on the radar [for my family].”

—PARTICIPANT, MEKONG NYC

CALLS FOR EQUITABLE SCHOOLS

Many residents called for more equitable educational investments across schools and neighborhoods. Many associate meaningful investments in schools with White, affluent areas and want to see more transparency around school segregation, investment, and educational achievement. Like in housing segregation, parents are often more concerned with equity than integration.

“It’s not a bad thing to be integrated, and it’s not a bad thing to be separated. The bad thing is that when we all pay our fair share and we’re not getting the equal things. If your school has good books and computers, and I’m paying taxes as well, my children should have good books and computers in their class. When things are really equal, people don’t really pay attention to being separated. It gets noticeable when you see that you’re being denied things that other people have.”

—PARTICIPANT, HPD-LED CONVERSATION IN SOUTH BROOKLYN

REDEFINING EXCELLENCE

Some residents shared concerns that the connection between testing and quality education could have a negative impact on how residents and the City define success in public education.

“I lived in Brooklyn in the projects, and then when it came time for high school, I went to Manhattan. But I didn’t like it and I wanted to be back in my own zoned school. I loved that high school, and the people I graduated with are now doing really well. It was considered a ‘bad school’ back then, but being in a bad school doesn’t mean we will be bad people.”

—PARTICIPANT, FLATBUSH DEVELOPMENT CORPORATION

SCHOOLING AND NEIGHBORHOOD CONTEXT

Participants also called for more holistic, inclusive, and culturally competent schooling that creates a welcoming environment for diverse students and responds to neighborhood context.

“Educators should really research the roots of low student attendance. It might not be about students not being smart, but rather economic issues and housing issues. These can cause mental health issues. So we should develop policies that aren’t just putting a Band-Aid on it.”

—PARTICIPANT, ASIAN AMERICANS FOR EQUALITY

THE IMPORTANCE OF ECONOMIC EMPOWERMENT

SYSTEMIC BARRIERS EXIST

The lack of housing choice faced by the majority of participants cannot be untangled from challenges related to poverty and limited economic opportunity. In discussing issues like jobs, benefits, banking, and homeownership, many residents identified clear systemic barriers that limit their economic security and autonomy.

“There are pay gaps in the workforce for women and women of color. When you are getting paid less, [there is] more of a challenge dealing with cost of living.”

—PARTICIPANT, NEIGHBORS TOGETHER

EMPLOYMENT MATTERS

Participating New Yorkers called for more meaningful pathways to employment for populations who face barriers in the job market—including people of color, people with disabilities, justice-involved individuals, and transgender and gender nonconforming residents.

“There is huge employment discrimination, particularly for transwomen of color. If you’re surviving in a different, underground economy, how do you apply for housing? How about publicly-supported housing? Plus health. You can’t work if you can’t maintain your health, but you have poor healthcare unless you work. These challenges don’t happen in a vacuum.”

—SERVICE PROVIDER, ANTI-VIOLENCE PROJECT

THE NEED FOR BENEFITS REFORM

Residents discussed how increasing access to employment is directly tied to reforming benefits programs, including rental assistance, to ensure they foster opportunity rather than penalize career advancement.

“If we can get people with disabilities working, maybe it will change how they view us, how they rent to us, how they loan to us. The fact is that [people with disabilities] don’t have work, we don’t have the proper training programs to get work, and we’re just too afraid to leave our benefits because we think we’ll miss out on critical Social Security and Medicaid.”

—PARTICIPANT, BROOKLYN CENTER FOR INDEPENDENCE OF THE DISABLED

THE NEED FOR FINANCIAL EDUCATION

Participants discussed having limited access to financial services, including fewer banking options in their neighborhood, less information from financial institutions, and less trust in these institutions. Many immigrants and people of color feel that current systems are not designed to support them.

“Many Southeast Asian people don’t save money in the traditional American way. They put their savings in closets or under their bed. This is why banks would rather not take the risk. If you give a loan to a person of color, there is a perception that there is higher risk for [default] due to bad credit or personal history.”

—PARTICIPANT, MEKONG NYC

BANKS STILL DISCRIMINATE

Residents called for more to be done to combat discrimination in financial services and shared disheartening experiences with discrimination in the financial sector because of their race or neighborhood.

“I went to a bank to get a loan, and I was denied. They didn’t say it was because I was Black. They gave me some other dumb reason. Then I heard about Liberty Bank on 125th Street that is owned by Black folks from one of my co-workers. I went there and I told them I had tried two other banks before that. I said to them, ‘Don’t tell me that I can’t buy a house because I’m a woman, and I’m single, and I’m Black. I’m a veteran and a nurse.’ And they gave me the loan. I got the house, but what I had to go through was difficult.”

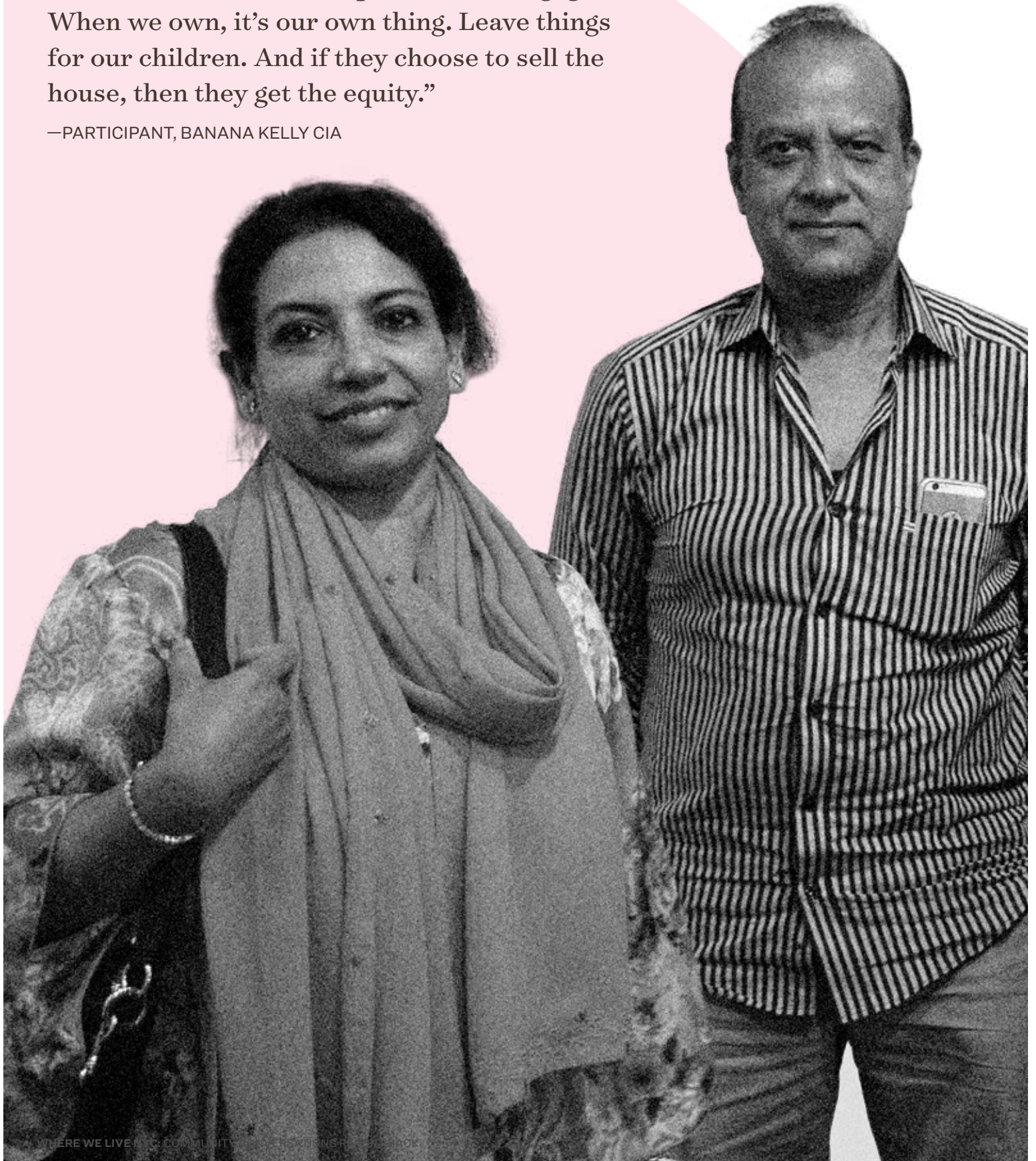
—PARTICIPANT, SAGE ADVOCACY & SERVICES FOR LGBT ELDERLY

THE DREAM OF HOMEOWNERSHIP

Homeownership was a goal universally shared across Community Conversations, but it is a dream that feels very far away for most participants. Many residents called for increased programs for homeownership, especially pathways for longtime neighborhood residents to work toward ownership. There was also desire for opportunities to help homeowners, especially seniors and people with disabilities, stay in their homes.

“I want to own property. I’m spending money on rent, and I would rather spend on a mortgage. When we own, it’s our own thing. Leave things for our children. And if they choose to sell the house, then they get the equity.”

—PARTICIPANT, BANANA KELLY CIA



WHAT WE LEARNED:

defining success

Through the Community Conversations, participating New Yorkers developed a collective vision for what success looks like in their own housing journey, for their family and community, and for the Where We Live NYC process. In dreaming up this future, residents stressed the importance of belonging, community connection, dignity, and self-determination.

A SUCCESSFUL FUTURE IN NEW YORK CITY IS A FUTURE WHERE...

“Everyone can grow
as a collective.”

—PARTICIPANT, CENTER FOR COURT
INNOVATION

“Children can live in
an affordable, diverse
place.”

—PARTICIPANT, FIFTH AVENUE
COMMITTEE

“You feel included.
Where neighbors
know you and you
feel seen.”

—PARTICIPANT, NEIGHBORS TOGETHER

“We aren’t just
living together, but
accepting of one
another.”

—PARTICIPANT, CHHAYA CDC



All residents have
“dignity, liberty, and
security.”

—PARTICIPANT, MAKE THE ROAD

“People impacted
by problems... take
the lead to move and
change policy.”

—PARTICIPANT, CHHAYA CDC

All residents “feel
safe and valued.”

—PARTICIPANT, MEKONG NYC

We have “spaces not
just for survival, but
for celebration.”

—PARTICIPANT, ANTI-VIOLENCE PROJECT

All residents “have
the ability to care for
a family, and make
their own choices.”

—PARTICIPANT, NEIGHBORS TOGETHER

All residents “can
flourish with
stability.”

—PARTICIPANT, FIFTH AVENUE
COMMITTEE



what's next

HOW WE WILL USE THIS INPUT

The extensive and thoughtful feedback collected from more than 700 New Yorkers across 62 Community Conversations is directly informing the City's development of fair housing goals and strategies that confront segregation, fight discrimination, and increase opportunity for all.

In addition to the Community Conversations, the City is also conducting data analysis; collaborating with more than 30 government agencies; and collecting input from a Fair Housing Stakeholder Group of more than 150 advocates, service providers, researchers, and community leaders.

The City will release a draft Where We Live NYC report in the summer of 2019 that will include a full overview of what we have learned throughout this effort, along with draft goals and strategies. A final report will be published in the fall of 2019 that will formally launch the implementation phase of this effort, following a detailed policy action plan outlined in the report. As part of Where We Live NYC, HPD will be hosting a series of public events throughout 2019 to ensure New Yorkers can continue to stay engaged and provide input.

acknowledgments

Where We Live NYC is an initiative of the City of New York, led by the NYC Department of Housing Preservation and Development (HPD) in partnership with the NYC Housing Authority (NYCHA) and in close collaboration with numerous additional government and community-based partners.

GOVERNMENT PARTNERS

Administration for Children's Services
City Commission on Human Rights
Department for the Aging
Department of City Planning
Department of Consumer Affairs, Office of Financial Empowerment
Department of Cultural Affairs
Department of Education
Department of Health and Mental Hygiene
Department of Parks and Recreation
Department of Probation
Department of Sanitation
Department of Small Business Services
Department of Social Services
Department of Transportation
Department of Youth and Community Development
Department of Veteran's Services
Mayor's Office for People with Disabilities
Mayor's Office for Economic Opportunity
Mayor's Office of Climate Policy and Programs
Mayor's Office of Criminal Justice
Mayor's Office of Immigrant Affairs
Mayor's Office of Resiliency
Mayor's Office of Sustainability
Mayor's Office of the Chief Technology Officer
Mayor's Office to End Domestic and Gender-Based Violence
Mayor's Office of Workforce Development
MTA New York City Transit
New York Police Department
NYC Economic Development Corporation
Office of Management and Budget
School Construction Authority
Taxi and Limousine Commission

COMMUNITY-BASED PARTNERS

The City of New York is partnering with a set of community-based organizations to lead Where We Live NYC Community Conversations with residents across the five boroughs. Partners include:

Ali Forney Center
Arab American Association NY
Asian Americans for Equality
Banana Kelly Community Improvement Association
Brooklyn Center for Independence of the Disabled
Center for Court Innovation
Center for Independence of the Disabled NY
Chhaya CDC
Fifth Avenue Committee
Make the Road New York
Neighbors Together
SAGE Advocacy & Services for LGBT Elders
Sapna NYC

A number of additional partners helped to support the community conversations:

Arverne View Tenant Association/L+M Development Partners
The Axis Project
Bronx Power
Flatbush Development Corporation
Guns Down Life Up
HPD's Division of Tenant Resources
Independence Care System
Mekong NYC
Metropolitan Council on Jewish Poverty
MinKwon Center for Community Action
Neighbors Helping Neighbors
New York City Housing Authority (NYCHA)
NYC Anti-Violence Project
NYC Mayor's Office to End Domestic and Gender-Based Violence (ENDGBV)
NYC Family Justice Center in Staten Island
The Point Community Development Corporation
Sadhana: Coalition of Progressive Hindus
United Jewish Organizations of Williamsburg
Voces Latinas

FAIR HOUSING STAKEHOLDER GROUP

The City of New York has brought together advocates, service providers, housing developers, researchers, and community leaders to provide insight and input throughout the Where We Live NYC process.

ADDITIONAL SUPPORT

To support the design and execution of resident engagement for Where We Live NYC, the City of New York is working closely with a consultant team, including:

HESTER STREET

Urban planning, design, and community development non-profit organization that provides technical and capacity building assistance to community-based organizations, government, and other agencies, ensuring that the people have the tools to shape their own cities

INTERACTION INSTITUTE FOR SOCIAL CHANGE

Racial justice organization that supports complex organizations, networks, neighborhoods, and movements to create equitable outcomes for communities of color by increasing collaborative leadership

HOUSEOFCAKES

M/WBE multi-disciplinary design studio offering website development, marketing strategy, and complete branding and identity services with a focus on social justice and public policy clients

BUROHAPPOLD

Multidisciplinary engineering and strategy consultancy with a robust track record of developing strategic planning initiatives with the City of New York

ARTS EAST NY

Local arts and storytelling organization committed to presenting, promoting, and preserving multicultural arts to address socio-economic issues that hinder community growth and development



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Appendix B

Stakeholder Roundtable Results

Introduction

Appendix B includes the key materials summarizing the results of each of the convenings of the Fair Housing Stakeholder Group. The Stakeholder Group met over the course of 2018 and 2019 through three phases, each of which included multiple roundtables on a range of fair housing topics. Careful notes were taken at each workshop, which were synthesized, shared back with participants, and used as the basis for future discussions. For explanation of the structure and format of the Fair Housing Stakeholder Group, please see Chapter 4: Creating the Report.

The materials included in this appendix are:

Learn Phase Roundtables Qualitative Data Synthesis

- Topic-Based Roundtable A: Causes of Segregation and Integration (May 4, 2018)
- Topic-Based Roundtable B: Disproportionate Housing Needs (May 22, 2018)
- Topic-Based Roundtable C: Education (June 5, 2018)
- Topic-Based Roundtable D: Environment, Health, and Safety (June 22, 2018)
- Topic-Based Roundtable E: Employment and Economic Opportunity (July 12, 2018)
- Topic-Based Roundtable F: Transportation (July 25, 2018)

Create Phase Roundtables Facilitation Materials and Qualitative Data Synthesis

- Roundtable Handout: Top 9 Contributing Factors
This handout summarizes the top contributing factors prioritized by the Fair Housing Stakeholder Group and participating City Agencies during the Learn Phase Stakeholder Roundtables. The handout was used to frame discussions of potential solutions during a series of Create Phase stakeholder roundtables.
- Create Phase Roundtables Synthesis
Summarizes the main ideas shared by the Fair Housing Stakeholder Group at the Create Phase Roundtables, held in November and December 2018, and supplemented by one-on-one meetings with stakeholders in January 2019.

Finalize Phase Roundtables Facilitation Materials and Qualitative Data Synthesis

- Breakout Group Presentation: Rough Draft Fair Housing Plan
- Finalize Phase Stakeholder Roundtable Synthesis (May 2019)

Where We Live NYC

Topic-Based Roundtable A: Causes of Segregation and Integration

Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Causes of Segregation and Integration Learn Phase Roundtable that took place on May 4, 2018.

(++) indicates that this idea was discussed at multiple tables.

Key Takeaways

- Participants wanted to see a greater acknowledgement of institutional and structural racism, as well as positive efforts to promote integration, in the history and root causes.
- Participants identified gentrification, displacement, and loss of affordable housing as critical aspects of understanding the existing conditions of segregation and integration in New York City.
- Participants argued that an analysis of existing conditions should recognize that current examples of residential integration are often transitional and instable, and that a diversity of residents in an area does not always equate to social integration.
- In measuring segregation, participants emphasized choice and access to opportunity—particularly the lack thereof for people of color compared to Whites. There was less alignment on the relevance of measuring levels of segregation between non-White groups.
- Participants argued that HUD's focus on R/ECAPs as a measurement was limiting, and that an analysis of segregation should prioritize measuring and addressing White concentrated areas of wealth, as there are significant barriers to entry to these areas.
- Participants' top five prioritized contributing factors for this topic included:
 - **Location and type of affordable housing**— New affordable housing is being built predominantly in areas of concentrated poverty; location of public housing impacts patterns of concentrated poverty; insufficient programs/requirements for building affordable housing in higher cost/opportunity areas; lack of a balanced strategy to promote access to high opportunity areas while supporting needs in low-income areas; limited funding for vouchers, making mobility to higher-rent neighborhoods challenging.
 - **Loss of affordable housing**— de-regulation of rent stabilized housing (vacancy increases, decontrol, preferential rents), particularly in face of global market pressures; predatory equity leading to loss of affordable housing in neighborhoods where rents are increasing; limited affordability durations, making preservation challenging when market in a neighborhood changes.
 - **Displacement of residents due to economic pressures**— connected to loss of rent-stabilized housing, increasing rents, land prices, income inequalities, and limited preventative legal services, all challenging the ability for low-income residents to stay in certain neighborhoods as rents/markets increase/improve, and further segregating/concentrating in other neighborhoods.
 - **Lack of public/private investments in specific neighborhoods**— lack of sufficient wrap-around services with affordable housing; lack of grass-roots investments or local economic development strategies that impact poverty/incomes; insufficient protections to ensure residents can stay to enjoy investments when they are made in low-income communities.
 - **Private discrimination**— both overt and covert tactics to discriminate against source of income, race, family status, disability status, gender/sexuality; includes background checks and other economic mechanisms that produce racial outcomes (segregation and concentrated poverty).

Understanding Existing Conditions

I. Adding Historic Causes to Segregation and Integration

In the presentation on historic causes of segregation, integration, and concentrated poverty, we heard that participants wanted to add, articulate, and/or emphasize:

- **Institutional racism's role:** Historically, policies were intentionally designed to segregate as a form of racial domination, rooted in slavery and racism in the country's founding++. Solutions to concentrated poverty and segregation never addressed root causes; lack of reconciliation and reparations.
- **Police practices++:** state sanctioned violence against people of color trying to move out of enclaves; policing of certain neighborhoods.
- **Positive efforts to achieve integration++** by the Urban League, NAACP, and others that are also part of the history. Add other Fair Housing milestones, e.g., amendments to add protected classes.
- **School policies:** impacts of historic school segregation and student assignment policies.
- Historic racial economic stratification means **the financial system** reinforces existing patterns through seemingly neutral tools (credit score, etc.).
- **The role of the real estate industry, land, and property values:** capitalism and market forces perpetuate the status quo.
- **The role of media:** in shaping public narrative about safety or value in particular neighborhoods (and how people respond/perceive that neighborhood).
- **Behavioral racism:** not just institutional acts, but also everyday community opposition and individual choices/behaviors have perpetuated segregation, sometimes exercised through violence.
- **1930s-70s:** the siting of public housing as well as transit/infrastructure investments (how minority communities became concentrated in areas proximate to hazards)++. Need more emphasis on not only who historically didn't get investments, but who *did* get investments and their advantages.
- **1960s-today:** historic preservation in concentrated areas of wealth, which hurt affordable housing creation in those areas; eminent domain and universities who own a lot of property.
- **1950s:** After WWII, certain private housing complexes, like Stuy Town, were dedicated to certain populations. Note impact of GI Bill; history of Mitchell Lamas.
- **1950's-today immigration:** role of U.S. govt. foreign policy (e.g., in Latin America) that dictate immigration/migration patterns. Ethnic enclaves formed as networks—safer and more accessible for immigrants to move into relative to racism faced outside. Also, historically, public housing materials were not translated into other languages and this impacted who lived there.

II. Analyzing Patterns of Segregation and Integration

We heard from participants that:

- **Poverty has grown in suburban areas**, some due to immigration and/or displacement from the city++
- **Rapid change has happened, particularly gentrification and displacement++.** There may be large differences since 2010 not captured by the maps. White residents are moving inward in boroughs, facilitated by transit connections to commercial centers and jobs, types of land use patterns and housing stock available (e.g., brownstones), and zoning/development incentives.
- **Shelter populations or other people in group homes** are not captured in the ACS data, but should be considered in analysis.
- **Regional map may misrepresent Whites in the region** because they are barely a majority, but the regional map looks deceiving because the dot density is more spread out (not overlapping).

III. Defining & Measuring Integration

We heard participants note that examples of diverse and integrated neighborhoods are areas that:

- **Have a variety of housing typologies** that facilitate socioeconomic diversity (e.g., Ditmas Park)
- **Have been shaped by immigration from around the world, with still remaining White populations** (e.g., Bedford Park, Norwood, Jackson Heights, and Northern Staten Island)

- **Were intentionally racially integrated** (e.g., LES++, Two Bridges, Starrett housing). But racial quotas were deemed unconstitutional and make achieving diversity challenging.
 - “The law impedes us from taking race into account, even though we want to use it to combat segregation.”

We heard from participants that, in analyzing segregation and integration, it is important to consider that:

- **Integration needs stability++:** Some places may look **integrated in a point in time**, but only appear so because of gentrification. In reality, they are not stably integrated and will be predominantly White soon. Some expressed concerns that some might view gentrification as achieving integration. But in this model, 'integrated' neighborhoods are ones with public housing, where residents cannot be displaced, though remain socially segregated in their campuses ++
- **What matters most about segregation is whether people have choice and access to opportunity++.** Segregation of cultures is not necessarily bad: immigrants tend to cluster where they know others like them when they first migrate (network/help navigating); some people may choose an area because of their community, goods, culture.
- **“Integration” (defined as Whites moving into communities of color) can lead to conflicts between groups and heighten distrust. Because of power imbalances, White residents tend to be safer than others++.** Many long-time residents of color see more investment in White/wealthier newcomers, and negative outcomes for people of color, including increased police violence++; changes in cost/types of goods; impacts on mental health, depression, and trauma.
- **Integration implies some amount of meaningful interaction between groups++.** Places like Carroll Gardens or Chelsea can be diverse/desegregated, but not necessarily “integrated.” Segregation is not limited to housing, but also amenities and schools++ For example, White families in gentrifying neighborhoods may send their kids out of the district or patronize a different set of businesses.
- **There were mixed opinions on the White vs. non-White binary framework of segregation.** While some felt that the binary is a White-centric lens, others felt that, given the history, the absence of Whites is what makes a neighborhood “segregated.”
 - "We've had one group that has been systematically privileged and continue to be, so it does matter where White people live, not because they are White, but because they bring political capital and resources."
- **There were mixed opinions on the relevance of segregation amongst non-White groups.** For immigrants, it's often safer to move to an enclave because the threat of racism outside and access to important networks inside (not necessarily segregation)++. But also, enclaves historically self-policed and kept other ethnicities, including other minorities, out (discrimination/segregation).
- **Scale is important when discussing integration++.** For example, Crown Heights census tracts may look integrated, but there is segregation (and even violence) on the block and building-level.

Participants suggest the City reference the following additional studies, data sources, or analysis to understand segregation/integration in NYC:

- Follow-up with Professor Dinzey-Flores on her research: land value and "segregation in motion"
- Affordable housing lottery data
- Hope Count data
- Robin Hood's research on poverty
- CNYCN's study of USPS data to track where people forwarded their mail (why and where the moved)
- Eviction rate index (to understand displacement's impacts on communities of color)

IV. Identifying Future Trends

We heard participants note the following as trends that the City should keep in mind:

- **Growing wealth inequalities:** new, White New Yorkers coming from outside the city and state, and how their wealth will impact NYC and longtime residents via gentrification++. Simultaneously, many low-income people of color face precarious work, unfair scheduling, and wage stagnation.
- **Impacts of hot real estate market:** e.g., new development via rezonings, shift to bigger landlords, aggressive speculation, flipping of neighborhoods with minority homeowners, AirBnB, warehousing, etc.

- **Nation-wide massive eviction/displacement rates**, especially in urban areas. People are losing their homes, moving into shelters, or out of the city into inner-ring suburbs.
- **Policing and incarceration** as a tool of displacement and limiting opportunity for men of color.
- **Use of eminent domain on behalf of universities** in urban areas will continue segregation trends.

V. Analyzing & Measuring Concentrated Poverty and R/ECAPs

We heard from participants that:

- **The focus should not be on R/ECAP areas, but more on the areas without low-income people of color++.** Analysis should measure concentrated areas of White wealth ++
 - "Segregation is White people's fault, and so the burden on solving it should fall on them."
- **The location of NYCHA and Section 8 housing** (very dense concentration in high-rises), could contribute to concentrated poverty patterns.
- **There are concerns about undercounting** by the U.S. Census of minorities that might not capture other areas that face similar challenges to R/ECAPs – need more qualitative data to confirm.
- **R/ECAP analysis could be done in different poverty thresholds and geographic scales**, such as block groups, to capture other areas that might experience concentrations of poverty and racial/ethnic segregation. Lowering the threshold for concentrated poverty to 20% could more representative of experienced poverty. For example, the North Shore of Staten Island isn't shown as a R/ECAP, but has a high low-income, non-White population. Others wanted to see Community District-level results.

Understanding and Prioritizing Contributing Factors

Below includes an overview of what we heard participants discuss at the tables on each of the contributing factors related to Segregation and Concentrated Poverty. The contributing factors below are listed in order of how participants prioritized across the tables, from highest to lowest number of individual votes.

Location and type of affordable housing (20)

- **Siting/incentives:** Location is impacted by feasibility (land prices, development incentives, and community opposition), which often results in affordable housing built in segregated and concentrated areas of poverty ++. There is a lack of balance of providing access to high opportunity areas while still providing assistance in the places that have the most need.
- **Not enough supply and lack of deeply affordable units in a range of sizes:** Too many people are applying to too few units. There is heavy reliance on new development because of the loss of regulated units, but affordability levels of new construction are not accessible to those earning extremely low incomes++ (unless already homeless) or for larger families (which may impact certain groups).
- **Lack of economic development with affordable housing.** Government has historically concentrated deeply affordable housing in certain areas, but did not provide wrap-around services to promote economic mobility, which has led to deeper and more concentrated poverty.
- **Lack of affordable homeownership:** City mostly incentivizes rental, but homeownership can reduce displacement pressure and allows intergenerational wealth-building; not enough information and financial literacy on homeownership opportunities if it was not passed down generationally.
- **Lack of rental assistance funding:** Government expends high costs to house the homeless in shelters, meanwhile, there is a lack of funds for Section 8 that could prevent homelessness.
- **Affordability duration:** Affordability restrictions in higher opportunity areas are too short, and there is a lack of community control and collective ownership.

Loss of affordable housing (19)

- **Flawed rent stabilization laws++:** Vacancy increase and decontrol, preferential rents, and harassment targeted to tenants of color, lead to their displacement, and enable landlords to bring in wealthier, White tenants. There is a lack of regulations to protect tenants and enable people to stay where they want to live, and prevent eventual re-segregation as neighborhoods change++.
 - "There can be a moment of integration, but loss of affordable housing and displacement can tip it back into segregation"

- **Predatory equity:** Mortgages are structured to guarantee that current renters paying less will move out, and for higher rents to be established (making units inaccessible to low-income).
- **Affordability duration:** Many housing affordability programs are short term in duration and susceptible for turnover into market rate, becoming unaffordable for low-income families.
- **Global market pressures:** Land speculation, AirBnB impact, and pied-à-terres drive housing costs up and make areas more unaffordable.

Displacement of residents due to economic pressures (18)

- **Gentrification and pricing out of people++:** highly connected with loss of rent-stabilized housing – people are forced to move to a more segregated neighborhood or out of state; fuel by increase in higher income individuals and roommates who can afford higher rents than families.
- **Income inequality++:** 40 year wage crisis, reinforced by global capitalism. Displacement is a racialized moving of people because of the relationship between race and wealth; privileges exist for people who come from wealth.
- **Legal services funding mismatch:** Legal services are funded mostly in rezoning areas. There is a lack of funding in other areas to get ahead of neighborhood change and prevent displacement.
- **Underfunded counsel for homeowners:** to address lien sales, foreclosures, deed theft.

Lack of public/private investment in specific neighborhoods (16)

- **Investments without tenant protections++:** Double edged sword of increased investments and running the risks of increased displacement.
 - “We need to invest, but be responsible and create a housing market where a landlord cannot be the only determinant of whether a tenant stays or goes.”
- **Inequitable access to credit to invest++:** Some groups have been denied the opportunity to invest in their own community (access to credit/wealth-building), but gentrifiers seem to be welcomed; there are many all-cash investors.
- **Lack of economic development investments in people:** such as job creation and other wrap-around services in areas with concentrated low-income families to help them advance economically.
- **Investments for whom:** infrastructure that serves tourists are well invested in, but they don't necessarily serve the local community (e.g., Yankee Stadium) compared to other needed investments.
- **Lack of an equity and environmental justice lens:** the burdens of increased sewage and trash from new luxury developments fall on low income communities.

Private discrimination (14)

- **Source of income discrimination++:** Rent seems to always be a little bit out of reach. People have to go through mazes (e.g., non-existent phone numbers) when they tell an owner they have a voucher.
- **Harassment and evictions++:** used as a tool to displace people of color and bring in new White, wealthier tenants; slumlords fail to maintain buildings or respond to repair requests to frustrate tenants over time so that they leave and open up vacancies.
- **Co-op boards++:** don't have to give reasons for rejections.
- **Economic mechanisms that produce racial outcomes++:** Responding to the first waves of litigation, racial discrimination now occurs in the form of minimum income requirements, rent to income ratios, or credit scores. Immigrants, for example, who haven't established credit, are excluded.
- **Background checks that produce racial outcomes++:** criminal background checks and history of housing court can blacklist you. They are not a predictor of how good a tenant is going to be or how they will impact building safety.
- **Discreet tactics difficult to capture:** People of color, trans individuals, are found to be charged more, or shown a 'revolving door.' Suddenly units are not available, there are extensive waiting lists that don't really exist, etc. “Before with FHA it was a slammed door, now it's a revolving door.” The language realtors use when showing properties go around the 'prohibited' language.
- **Racial steering by brokers:** Realtors make assumptions about what is best for their clients based on their race and steer them to particular neighborhoods.
- **Difference in quality of units:** Landlords are not providing safe/quality spaces for transgender communities and the chronically homeless in general.

- **Against families with kids and people with disabilities++:** Landlords are asking people if they have kids, how many and whether they are going to live there. Stigmas associated with FEPS vouchers - means it's a family. Landlords are not creating accessible unit for people with disabilities.
- **Ethnic enclave exclusivity:** There are communities where certain groups want to remain exclusive, but it's not necessarily overt discrimination.
- **Limited enforcement++:** CCHR has limited funding and a few testers per unit. People don't know how to report discrimination, and don't see that filing a complaint will do much++. Too many bad actors and limited legal resources, which tend to focus on larger players to get big settlements.

Lending discrimination (12)

- **Historic lending impacts++:** including the 2008 foreclosure crisis, have led to racial wealth gaps, which compound and constrain future patterns.
- **Predatory equity++:** Mortgages are structured to guarantee that current renters are moved out; lack of enforcement.
- **Against people of color:** Banks offer Black borrowers lower value loans, different interest rates, even if their income exceeds and they are more qualified than White testers.
- **Suburban areas:** Studies show there is lending discrimination towards homeowners of color, including in commercial real estate.
- **Lending gaps:** low dollar amounts for home repairs; people turned down for loans may turn to predatory lenders or other non-traditional methods to finance their home.
- **Racialized neighborhood revitalization:** There is gentrification now, where outsiders can come in and have access to private financing to revitalize neighborhoods, where other groups were excluded from that practice. Community Reinvestment Act might encourage gentrification in some areas – who is accessing the credit that's being offered?

Inclusionary zoning policies (12)

- **Mandatory Inclusionary Housing:** has been implemented only in low-income neighborhoods. It is a missed opportunity to further mobility and integrate wealthy, white areas++. Program design is often influenced by politics and community opposition.
- **Affordability tiers++:** Mandatory component of MIH is good, but one size doesn't fit all and new units are not accessible by extremely low-income residents; 421a does not provide deep affordability.

Community opposition (8)

- **Organized White NIMBY-ism++:** targeted effort by high opportunity areas (with wealthy homeowners) to limit affordable housing, shelters, supportive housing, and MIH rezonings. Often systematized: management companies in White and wealthy neighborhoods have organizing arms to say "protest this development," noting that an action will lower the value of the building.
- **Lobbying++:** business developers give money, paying for laws that keep discrimination and exclusionary practices in place (realty, community boards, lawyers).
- **Gaps in public review process and civic engagement++:** Sometimes people don't know what's happening in their neighborhood – it depends on who shows up to meetings, composition of community boards, etc.
- **Opposition based on perception that projects will not serve the community and/or fear of displacement++:** Longtime communities that have seen disinvestment are opposing revitalization, including new affordable housing, because it does not feel like it is for them – inaccessible rents; fear of displacement; lack of clarity around how affordable housing programs work and how the local community will be served. A participant noted that community preference has been a helpful tool in siting supportive housing, managing opposition, and building cohesion between the people in the neighborhood and the residents.

Use and density restrictions (8)

- **Low density zoning++:** Outer-borough and suburb zoning restrictions, preserved by White wealthy community opposition, don't allow for affordable housing development in parts of Queens and Brooklyn where there are high performing schools.

- **Density caps in areas with high infrastructure/transit access:** there are few places where zoning permits high density housing, with the right transit and infrastructure to accommodate dense development. Greenwich Village for example is a missed opportunity. 12 FAR cap limits development in high opportunity areas.
- **Historic districts:** prevent growth and density, especially in high opportunity areas

Impediments to mobility to integrated and/or high opportunity areas (7)

- **Voucher terms:** do not allot a sufficient amount so it dictates where you can live: impoverished, high crime areas with poor schools (FMR issues)++. Expiring vouchers also create ineffective pressure.
 - "This should be a higher priority. We offer so many voucher programs, but people are still concentrated in higher poverty communities."
- **Lack of requirements / enforcement for landlords to accept vouchers**– cannot force an owner to accept the voucher, and thus location of voucher holders is driven by discrimination++
- **Voucher funding:** lack of resources for section 8++. HUD budget is a fraction of what it was. If vouchers were more common, there would be less stigma.
- **Voucher administration++:** Section 8 is not administered well. If it were, perhaps landlords would welcome Section 8 tenants and the constituency would grow - become normalized.

Lack of community revitalization strategies (7)

- **Economic development:** lack of meaningful job creation strategies– especially for NYCHA residents
- **Lack of grass-roots revitalization++:** These areas lack and need investment, but public investments are often not grass-roots and community driven. There is a perception that top-down revitalization strategies are not designed for low-income residents.

Other: Racialized Capitalism (7)

- **Ownership and power limited to Whites:** historic privileging of Whites through land and wealth.
 - "Land was given for redlining in the excess of 120 billion to White families and companies. When you own the land you make the laws. The laws are based on how White people want to leverage the landscape."
- **Structural racism:** an ongoing value system that protects White, wealthy interests and power, while marginalizing communities of color. This is still visible today and underlying in all of these practices. There is a lack of an anti-racist, anti-gentrification plan.

Lack of local or regional cooperation (6)

- **Community opposition:** When families move upstate, they face suburban town discrimination. Suburbs also refuse to take in homeless families. The City carries the burden of addressing homelessness for the region.
- **Low density zoning:** Suburb zoning restrictions don't allow for affordable housing development

Public review processes (5)

- **Process facilitates opposition:** Affordable housing NIMBY-ists rely on the lengthy public review process to oppose a project and win; become lost opportunities to integrate areas++.
- **Lack of master plan:** Isolated projects allow communities to argue against "out of context" projects without a master plan to refer to the relevance of the action.
- **Discretionary review:** Some people in communities do not have a choice in how their areas are revitalized. For example, hundreds of people can come out to testify but projects get approved anyway.
- **Impact analysis:** Displacement costs are under calculated and don't look at the larger impact.

Other: Wealth Gap and Lack of Access to Economic Mobility (3)

- **Lack of access to upward mobility:** rooted in a larger system designed to stratify people; inflated market makes it only accessible to a few who have historically accumulated wealth
- **Lack of community control** and collective ownership.

Other: Property Taxes (2)

- **Increases in water rates and property values** in changing neighborhoods place additional pressure on low-income homeowners and their tenants to be pushed out of their neighborhoods; lack of a progressive tax system.

Other: School Choice and Quality (1)

- Another example of Whites hoarding opportunity and advancement.

Where We Live NYC

Topic-Based Roundtable B: Disproportionate Housing Needs Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Disproportionate Housing Needs Learn Phase Roundtable that took place on May 22, 2018.

(++) indicates that this idea was discussed at multiple tables

Key Takeaways

- Participants cautioned that because of potential undercounting or miscategorization of particular populations, survey data may not capture the severity of their unique housing challenges and needs. They also suggested analyzing the housing needs of more specific ethnic groups.
- Participants identified unique challenges faced by certain populations in accessing both private and publicly-supported housing. These include: physical accessibility issues, administrative language barriers, informal incomes or credit score barriers, lack of documentation, or discrimination and social stigma against their characteristics. While there are unique challenges for each population group, participants identified affordability as an issue affecting all protected class populations.
- Participants noted that many protected populations rely on supportive networks and specialized resources (family, networks that speak your primary language, accessible transit, service providers, specialty food stores, etc.), and moving to affordable housing in neighborhoods lacking these networks can be isolating or even detrimental.
- Overall, the top six contributing factors to disparities in access to quality and affordable housing that participants identified are:
 - **Loss of affordable housing** – reduces housing options for protected classes and low-income New Yorkers that rely on this housing stock. Loss results from deregulation tactics, lack of enforcement; limited tenants' rights, expiring subsidies, and redevelopment incentives.
 - **Displacement of residents due to economic pressures** – contributes to loss of housing choice and housing options for protected classes and other low-income New Yorkers. Displacement leads households into shelters, homelessness, other low-income communities, or to double-up with relatives.
 - **Private discrimination** – including coded and covert practices by landlords, brokers, co-ops, etc. to deny housing for people of color, immigrants, voucher holders, certain religious backgrounds, families with kids, people with disabilities, and LGBTQ individuals. Covert discrimination occurs through denial based on an individual's involvement with the justice system or housing court, credit score, or, indirectly, through administrative barriers that make it challenging for people with disabilities or language difficulties to complete the lease-up process. Landlords also fail to provide reasonable accommodations for people with disabilities.
 - **Lack of fair housing outreach and enforcement** – including the lack of oversight and proactive incentives and enforcement to ensure compliance; lack of training for developers and property managers on fair housing responsibilities. Immigrant populations are less likely to report discrimination because of their legal status, language barriers, or fear of retaliation.
 - **Land use and zoning laws** – that limit affordable/accessible housing options for protected classes, including limits on heights and density in certain parts of the city, preventing multi-family affordable development; lack of strategy to implement mandatory inclusionary housing in high-income neighborhoods; development initiatives in low-income communities that create pressure on rents and potential displacement; lack of ADA enforcement in zoning.
 - **Occupancy policies and procedures in publicly-supported housing** – which may exclude or isolate households with disabilities and the elderly, who may need to live family or a non-related caretaker, pushing them to choose a group home or institutional setting; it can also limit large

and/or multi-generational households (non-traditional nuclear family households) in accessing publicly-supported housing.

Existing Conditions

I. Understanding Data on Housing Challenges

In reacting to how the initial data reflects participants' understanding of their constituencies' unique housing challenges, we heard the following:

- **Housing maintenance++** is a challenge particularly for immigrant populations that is not adequately captured by the data. Immigrant populations, especially those living in illegal units, are less likely to report housing maintenance issues because of fear of retaliation.
- **Underreporting on people with disabilities and immigrants in the public data.** The statistic that 11% of New Yorkers have a disability does not capture people living in group homes, or people who do not self-report hidden disabilities or mental disabilities. With these groups included, the percent would be higher.
- **Nuance within racial groups** may be significant especially amongst Asian and Pacific Islander populations. This is a large census category that encompasses many ethnicities, and there may be disparities across ethnic groups within the racial category.
- **Lack of data on LGBTQ populations**, which limits knowledge on needs for service providers, funders, and policy-makers.
- **Rent burden does not show clear disparity.** Rent burden by household type does not adequately capture the disparate burdens experienced by single-income earners with children. Rent burden should also be analyzed across income groups, as the impacts are not experienced equally (e.g., an extremely low income household paying no more 30% of income still faces heavy financial burdens due to limited disposable income, compared to a high income household paying more than 30% of income on rent). Rent burden by income should also be compared across racial groups to fully understand disparity.
- **Low population of some groups in shelter may be reflected in overcrowding difference.** Immigrant populations, especially Asian, may not go to shelters because of staff language barriers, so they resort to doubling-up or shift housing (multiple families cycling in and out of one unit). There is also a lot of doubling up by the Hispanic community. For example, first-generation college graduates (young adults) cannot afford to live on their own, so many tend to stay in multigenerational households.
- **Household size** may not capture complexity of multiple households sharing a unit. For example, in the Parkchester area of the Bronx, the typical family size is 3-4, but a 3-bedroom apartment might house three of those families.

II. Understanding Unique Housing Needs or Challenges

We heard participants note the following unique needs or challenges that their constituencies face:

- **Populations with disabilities:**
 - Due to older housing stock and limited enforcement, NYC has a lack of truly accessible apartments, and even fewer units that are both accessible and affordable. People with disabilities often put up with poor conditions or housing that is only partially accessible.
 - There is limited knowledge and enforcement around the right to reasonable accommodations, and fear from impacted tenants about making the request or going to housing court. Many people with disabilities end up paying for accommodations out of pocket, which drives up housing costs.
 - It's hard to find accessible housing in a range of household sizes, including 2Br+ so people can live in integrated settings with their families and/or have room for live-in help.
 - Housing options for people with disabilities, especially intellectual disabilities, is often limited to institutional/group settings, in large part because of the way supportive housing incentives and

social services are structured. Institutional/group settings can limit housing choice and access to opportunity for residents, and even discriminate against residents in wheelchairs.

- It is almost impossible to transition out of institutional/group settings into integrated housing because residents lack IDs and credit history, receive inflexible benefits, and/or lack the necessary support to visit and apply for other housing.
- **Voucher holders:** Landlords are not accepting people with vouchers; this is especially true for disability-related voucher holders. Lower income families living in higher-cost neighborhoods, though high opportunity, are often not able to afford amenities (e.g., groceries).
- **Immigrants and populations with limited English proficiency:**
 - May be more likely to have informal sources and/or inconsistent income, and, depending on their citizenship/documentation status, may have challenges accessing and building credit, affecting their ability to access private housing. As a result, immigrants may be more likely to reside in informal or illegal dwellings, such as basement or cellar units.
 - Based on immigration status and language barriers, there is a fear (and confusion of eligibility/rights) around applying for public assistance, confronting landlords of rent-stabilized buildings, and getting SCRIE or DRIE.
- **LGBTQ populations:** face discrimination and stigma in accessing housing. Landlords make assumptions about the type of employment LGBTQ individuals do (e.g., sex work) and the activities they might bring to the unit. Transgender seniors, in particular, experience discrimination when accessing housing. Care provider may not be related to them—how family is defined matters.
- **Seniors:** Many older adults do not use the internet, and have difficulty knowing housing options available to them. Aging in place is also an issue—retired seniors cannot absorb much rent increase. Some of the homes they currently live in are no longer appropriate for their needs. Credit scores can be a barrier too.
- **People of color, particularly Black and Hispanic households:**
 - Face differential treatment by landlords. New tenants, who are often White, in renovated units get repairs more quickly, while long-term tenants, who tend to be people of color, face landlords neglecting repairs out of interest to turn-over their tenancy.
 - Credit scores and Housing Court history can be used to put people on the tenant blacklist for causing perceived issues; low wealth/savings can be a hardship for application fees.
 - Face impacts of mass incarceration on the individual and household level (breaking of families; many single-parent households; discrimination based on incarceration status, etc.)
- **Justice-involved status:** creates a barrier in accessing both private and publicly-supported housing. Many justice-involved and survivors of domestic violence households are female-headed and face challenges around sufficient income.

III. Understanding access to publicly-supported housing

In reacting to the initial data, we heard from participants that:

- **Populations with disabilities**
 - Face challenges around getting fully accessible units in NYCHA, including long waitlists with no special preferences for disability status (thus many don't bother applying) and other maintenance difficulties, such as regular elevator break-downs and limited accessible options in case of an emergency. A participant reported refusing a unit because it was not truly accessible, and getting bumped to the bottom of the waiting list.
 - HPD lottery housing has a limited number of accessible units set aside for people with disabilities (only 7%), but even some of these units do not go to those who have disabilities and there is no oversight or enforcement of lease-up/re-rental to ensure they go to applicants who need the specially-designed unit. Some units are not truly accessible (cannot turn wheelchairs, etc.).
 - Supportive housing is often placed in areas with limited access to transportation, employment, and services.
 - Affordable housing income calculations do not take into account additional costs of unique living situations, which are often high out-of-pocket medical transportation costs. People with

disabilities may fear leaving a certain income bracket because of fear of losing their subsidies.

- **Immigrants and populations with limited English proficiency**
 - Face challenges communicating with NYCHA property management staff, who often only speak English and maybe Spanish. People also have issues recertifying or finding out their status on the waitlist because of gaps in language access within NYCHA.
 - Those who are selected for the lottery have problems proving stable income information, or their tax returns do not match because income is difficult to calculate (from multiple jobs, month-to-month pay, informal payment, etc.)
 - Computer literacy is an issue for accessing Housing Connect.
 - People who do not have a community support network like a housing ambassador (or know about housing ambassadors) often do not get picked for affordable housing. The low percentage of Asian/Pacific Islander populations in voucher programs may be due to a lack of outreach from organizations.
 - There are limited affordable housing opportunities in immigrant enclaves (e.g. Jackson Heights, Sunset Park), where immigrants rely on their community and networks.
- **Justice-involved:** There are barriers in accessing federal housing for people involved in the criminal justice system, and there are residency restrictions for past sex offenses.
- **There is lack of data collection on City-supported housing occupants;** housing lottery data is collected only at application, but it does not tell you who lives in the housing now.
- **In measuring demand and need for publicly-supported housing,** participants suggested the City control for:
 - **Household sizes of different ethnic groups.**
 - **Broader design considerations for people with disabilities;** there is a lack of housing that is 100% accessible. This is important to consider because at any time in someone's life they can be disabled.
 - **Control not just for income differences, but wealth differences;** information about income does not reflect intergenerational transfers of wealth. For example, the higher rates of rent burden in white populations might not reflect non-income transfers from parents.

IV. Suggestions for Additional Analysis

Participants suggest the City reference the following additional studies, data sources, or analysis to better understand disparities and needs for:

People with disabilities:

- Independent Care Systems
- Center for Independence of the Disabled, New York
- Studying who receives LIHTC accessible units and if they are truly accessible

Immigrant populations:

- Book: "Housing Divide" by Emily Rosenbaum
- Discrimination by co-op boards

Communities of color, around lending:

- IRS or Housing Mortgage Disclosure Act (HMDA) for data on disparities in mortgage lending
- Reveal podcast, which looked at disparities in approval and denial rates for mortgages in Philadelphia.

Publicly-supported housing residents and justice-involved:

- Osborne Association

- Fortune Society

Survivors of domestic violence:

- New Destiny
- Safe Horizons
- Mayor’s Office to Combat Domestic Violence

LGBTQ populations:

- National Center for Transgender Equality National Survey
- National Task Force (“Injustice at Every Turn”), which did a study for trans older adults

People living in shelters:

- Data on where people are entering shelters and the reasons why people go to shelters
- Intergenerational homeless and projections for children growing up in those conditions

Understanding and Prioritizing Contributing Factors

Below includes an overview of what we heard participants discuss at the tables on each of the contributing factors related to Segregation and Concentrated Poverty. The contributing factors below are listed in order of how participants prioritized across the tables, from highest to lowest number of individual votes.

Loss of affordable housing (35)

- **Loss of rent stabilized housing through speculation and deregulation tactics++:** speculation and predatory equity; landlords use harassment and preferential rents to evict low-income tenants, many of whom are people of color and immigrants, to evict, turn over, and get a vacancy increase; these populations then turn to doubling up, moving to other lower-cost areas, or to the shelter system. There is a lack of oversight and enforcement to bring units into compliance by HCR due to lack of resources.
- **Lack of lease renewal rights:** tenants who don’t live in regulated housing face a lack of protections and are even more vulnerable to displacement.
- **Incentives on shelter vs affordable housing:** some landlords turn over rent-stabilized housing into cluster sites/shelters to get more money from the City, displacing permanent housing while incentivizing shelter conditions for needy families
- **Expiring subsidies:** gets more expensive over time and not the best use of public resource; place-based Section 8 has maintained affordability for certain populations and protected classes in gentrified neighborhoods
- **Rooted in growing economic inequalities:** influx of high-income earners in the city is shifting the market and limiting opportunities for people with fewer choices.

Displacement of residents due to economic pressures (35)

- **Rezoning and new development pressures perpetuate segregation ++:** Displacement and lack of choice leads to families moving into shelters, overcrowding with relatives into a different low income community, or out of the city; new market developments do not replace units for low income communities; landlords overpay for rent-stabilized stock and harass tenants, who often don’t know their rights;
- **Rooted in lack of housing and stagnant incomes** for lowest- or zero-income earners, often protected classes, and loss of affordable housing; lack of opportunity to build wealth through homeownership for first-time buyers.
The rise of LLCs and the professional real estate industry and the commodification of housing (instead of a right) exacerbate the issues.

Private discrimination (29)

- **Coded and covert practices to discriminate**++ based on place of origin, source of income, religious association, familial status, LGBTQ status, ability, justice involved status (not a protected class). Tactics include showing different prices, amenities, and forcing tenants to jump through hoops. Related to lack of outreach and enforcement (see below).
- **Incarceration or Housing Court history** ++ a legal (indirect) form of housing discrimination along racial lines. Discrimination against justice-involved populations (largely Black and Latino) turns many of these individuals to shelters. Tenants are not able to get housing because of involvement in Housing Court, even if they tried to assert their rights for repairs (blacklisted). Tenants most affected by repair issues are low-income and most often people of color. This is also true for people with disabilities. Housing court is not designed to support them and does not keep track of landlord's track record.
- **Credit score barriers:** Many apartments today require minimum credit scores that bar populations, who do not have sufficient credit scores, perhaps due to a lack of credit history, lack of access to financial institutions, or due to living in an institutional/group setting – largely affecting communities of color and people with disabilities.
- **Income reporting challenges:** many immigrants have informal sources of income (under the table), and have difficulty providing official proof of income. People living in institutions transitioning to independent living are not able to provide proof of income during application because recipients don't receive letters indicating their SSI amount until after they leave the institution.
- **ID requirements:** challenging for people who have been living in institutions or group homes for many years. For trans individuals, legal form of identification sometimes doesn't match how they present themselves.
- **Language barriers and legal status** forces immigrants into illegal dwellings; poor conditions often go unreported because of fear of retaliation.
- **Indirect administrative barriers related to mobility:** some landlords require visits to an apartment in advance, making it challenging for people who are differently-abled or currently in an institutional setting. The search for an apartment can also be challenging for people with sensory disabilities who may not be able to call or search online for listings.
- **Co-Ops** do not disclose reasons of why they are denying a tenant and can turn down people with disabilities because they do not want to make the accommodation improvements to units.

Lack of fair housing outreach and enforcement (22)

- **Lack of incentives and proactive enforcement**++ to make sure landlords accept vouchers and provide reasonable accommodations; lack of oversight by government agencies to go after violators and strengthen existing laws in place; penalties too low.
- **Lack of training for developers and property managers**++ on fair housing, anti-bias training, accessibility, and managing relationships with tenants with special needs. Onus currently is on the tenant, who often does not understand their rights to fair housing or reasonable accommodations. Tenants face stigma from landlords who associate voucher holders, justice-involved status, LGBTQ status, etc., with unlawful economies or stereotypes around violence.
- **Lack of resources and funding** ++ to train and enforce. Legislature has decreased funding to go after discrimination cases, which makes it harder to enforce policies.
- **Lack of tenant education** on rights and how to gather information to prove discrimination.

Land use and zoning laws (19)

- **Height limits and low density zoning**++ prevent affordable housing and supportive housing development in certain neighborhoods, limiting housing options for protected classes. In Eastern Queens, for example, there are blocks zoned for low density, and a lot of community and political opposition, which prevent the development of multifamily housing.
- **MIH**++ is implemented in low-income but not high-opportunity areas; concerns that incentives for denser market developments through zoning changes will be expensive and unreachable for protected classes, puts pressure on other rents in the neighborhood, changes community environment, and encourages displacement, further limiting affordable options.

- **Limited tools in zoning to enforce/impose ADA accessibility.**

Occupancy policies and procedures for publicly supportive housing (18)

- **Affordability levels and Income guidelines ++:** Some people do not meet minimum income threshold for housing and also face barriers b/c of credit score. Income limits are not flexible and too high for those with SSI, including many people with disabilities.
- **Limited percentage of units set asides for people with disabilities:** and lack of oversight on whether unit goes to a person who needs it, especially after re-rentals. Some supportive housing excludes people with physical disabilities.
- **Unit sizes and occupancy standards discourage integrated settings:** Units for people with disabilities and seniors are usually studios and 1-BRs, and prevent living with family members and/or caretakers. Seniors, for example, are often not able to live in senior housing with family and/or caretakers that are non-seniors. Seniors in NYCHA may need a live-in caregiver that may create overcrowding by NYCHA standards. People do not have the resources they have in an institution in their communities, which is why seniors feel incentivized to be in an institutional setting.
- **Rules around relations between tenants:** For elders and people with disabilities with 'families of choice,' their care provider may not be related to them.
- **Current standards for minimum/maximum # of bedrooms** do not support multigenerational, extended family structures, including families with multiple children or adults, which may impact certain ethnic groups.

Lack of assistance, accommodations, and supportive services (14)

- **Lack of supportive services ++:** Lack of accommodation and assistance for those who were formerly homeless, voucher-holders, and those with mental health issues, transitioning into permanent and independent living. Also, lack of community and support for immigrant communities moving into areas without their networks.
- **Funding constraints for social services:** For example, waivers allow services in a limited area and can't go to another area to access services. Participants with disabilities reported challenges around getting services for multiple disabilities from state agencies due to silo-ed funding of services, which forces them to make difficult trade-offs.
- **Supportive Housing for people with disabilities++:** Narrow availability and over/under exclusion of units for people with disabilities of varying support needs. There are people who could live independently but still need some minor support, but they end up living in group homes because they cannot access independent living (lack of incentives for independent living options). Some participants felt that supportive housing is exclusive to people with physical disabilities and that there's an assumption that all people with mental disabilities go into supportive housing.
- **Administrative barriers:** deadlines to gather materials for voucher applications is too short and can covertly disqualify people who have mobility challenges getting to places, or literacy/language proficiency limitations, to put together the necessary paperwork.
- **Rights and laws:** lack of knowledge by both landlords and tenants of their rights.

Location and type of affordable housing (13)

- **Development Incentives may perpetuate segregation ++:** New affordable developments are mostly built in lower cost communities, which are already high poverty, in flood zones, etc., exacerbating challenges faced by low-income families and populations with disabilities. Meanwhile, other wealthier neighborhoods only see market rate housing developments.
- **Limited development in immigrant enclaves:** Lack of affordable development in immigrant enclaves, who need their network and resources. People are applying to neighborhoods they are not familiar with and struggle to leave the neighborhood they have been part of.
- **Limited truly accessible units:** Not enough new affordable, accessible units for people with disabilities; some units, though noted as accessible, don't accommodate proper wheelchair turning radius, etc.

Lack of quality affordable housing information (11)

- **Limited language accessibility:** not just for tenants to understand their rights and resources or to get help applying or recertifying in a program, but also for landlords accepting vouchers, who might also be limited in English proficiency and face barriers communicating with the City or State regarding compliance.
- **Lack of clarity on eligibility for immigrants to public assistance programs:** the default for tenants (and providers) is to assume ineligibility due to legal status, which may not be the case
- **Lack of central areas to get support** for renewals for vouchers and other housing programs (e.g., HRA or HCR services); individuals don't know where to go or who to talk to in-person, with the appropriate language and accessibility accommodations.
- **Lack of information on homeownership or related programs:** lack of advertising of available options by HPD and others to promote homeownership subsidies and mortgage assistance programs to enable protected classes to own their homes and build wealth.
- **Wrap-Around Services:** Difficult for providers to provide information on services outside of housing, particularly in non-institutional settings. Vouchers/Services can disqualify families for other public programs.

Impediments to mobility to high opportunity areas (10)

- **Voucher-holders are steered to certain neighborhoods, despite not wanting to move there.** Brokers and organizations steer voucher holders to specific neighborhoods, where they know vouchers have a higher likelihood of being accepted (concentrating them in neighborhoods). This is particularly true for older adults with vouchers.
- **Unaffordable amenities in high opportunity areas:** Lower income families living in higher-cost neighborhoods are often not able to afford amenities like groceries or transit (if they need to drive due to lack of public transit).
- **Lack of affordable rents/developments** that meet voucher rent limits.

Community opposition (10)

- **Local and regional NIMBYism++:** limits low-income families' ability to move into high opportunity areas; racial undertones in NIMBYism, often masked in defending parking spots, community gardens, etc., and making assumptions about the groups developments are serving.
- **Land use process and Community Boards ++** oppose developments like shelters and group homes, discriminating against people with disabilities. Community developers often feel like they have to beg and justify developments for these groups to be allowed; ends up with a concentration of these services and populations in poor neighborhoods where there may be less opposition or civic power.
- **Community preference:** has become a tool for elected officials to care about new developments in their district – “how many people are going to come from my community?” Other participants want community preference to keep people who want to stay in the neighborhood from being displaced.

Lack of public/private investment in specific neighborhoods (10)

- **Lack of equitable development ++:** There is a perception that investments can only come with the incoming of Whites and wealth into communities of color and potential displacement. Meanwhile, there is a lack of welcoming of Black and Brown people in White and wealthy neighborhoods; perception that the only way to get investments in neighborhoods is through negotiation with a rezoning. There are no audits on equitable investment.

Lending discrimination (9)

- **Differential treatment by race ++:** Black and Latino borrowers encounter higher interest rates on mortgage loans and greater difficulty to refinance for home improvements, contributing to differences in access to homeownership and wealth building opportunities for people of color, while continuing to benefit Whites.
- **Credit scores history:** used as tool to discriminate against certain groups.

- **Community Reinvestment Act (CRA):** it is being used to gentrify by selling homes to White individuals in neighborhoods that were historically populated by people of color, instead of benefiting the residents in these neighborhoods. This also limits homeownership opportunities for communities of color.

Lack of affordable units in a range of sizes (7)

- **0-3BR standard unit sizes** do not support multigenerational/ extended family structures, which may impact certain ethnic groups and families with children.

Lack of quality financial services (6)

- **Immigrants face both language and financial literacy barriers** to build credit, etc.
- **Lack of credit history** after individuals are institutionalized for years, which presents a barrier because of their lack of credit/bad credit that disqualifies them for housing.
- **Lack of policies** to address intergenerational wealth disparities.

Occupancy codes and restrictions (5)

- **Basements++:** limitations on legality of basement apartments forces families living in them to be without protections.
- **Single Room Occupancy:** Law that outlawed SROs has increased costs to house certain populations, such as low-income seniors, childless couples, and homeless populations, limiting affordable housing options for these populations. To be eligible for supportive housing today, you have to be chronically homeless.

Inaccessible services and infrastructure (4)

- **Lack of neighborhood choice:** Given scarcity of accessible units, people with disabilities accept housing where available, despite inaccessible infrastructure; they are forced to choose to live in neighborhoods they do not want to live in and/or cannot get around, which is why this factor was deprioritized.
- **Inaccessible transportation** becomes a big barrier to where people with disabilities can live. E.g., Rockaways has one accessible station, but it takes 2-3 hours to get to an appointment in Manhattan or the Bronx. Access-a-ride is not reliable. It also affects support staff, who often have to drive to remote areas (if they have vehicle access), and thus cannot support people with disabilities adequately.
- **Curb cuts and other sidewalk conditions** make some neighborhoods inaccessible for people with physical disabilities; forces some to move into low-quality, far away neighborhoods in order to choose accessibility versus quality.

Where We Live NYC

Topic-Based Roundtable C: Education

Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Education Learn Phase Roundtable that took place on June 5, 2018.

(++) indicates that this idea was discussed at multiple tables

Key Takeaways

- Participants expressed that the combination of school zoning and choice policies are major drivers of segregation and disparities in educational opportunities. Lower-income families, immigrants, and homeless families do not always have the knowledge or ability to exercise choice, due to language barriers, limited time and resources, and physical distance. White affluent families move into high performing school zones (dominating the housing market and pricing out lower income families) or exercise choice to send their kids out of low-performing school zones.
- Participants noted that neighborhood conditions impact school conditions and student performance. Areas with a high concentration of poverty have schools with deteriorating conditions, concentration of students that face compounding challenges, and limited school resources. Meanwhile, schools in affluent areas with mostly White populations have better conditions, supplemental services, and are more likely to have facilities accessible to students with disabilities.
- Participants shared that the lack of diversity and cultural competency of staff/teachers within schools can also reinforce both segregation and inequities in access to quality education.
- Participants had mixed opinions on the impacts of gentrifying neighborhoods on schools. Some noted that it may give the appearance of integration, though it may be in transition, while others noted that gentrifying parents are exercising choice to send their kids to school in better performing zones. Some also noted that gentrification and the pricing out of low-income families might cause under-enrollment in schools (as new families send children to out-of-zone schools).
- Overall, here are the top five contributing factors to disparities in access to quality education:
 - **Location and type of affordable housing:** High concentration of public housing leads to high concentrations of poverty, influencing a student's school performance and the resources allocated to schools in these neighborhoods. Higher income neighborhoods with high proficiency schools do not see a lot of affordable housing developments or often oppose them perpetuating segregation in housing patterns and schools.
 - **Location and type of proficient schools and school assignment policies:** Lower income neighborhoods usually have lower quality facilities and greater challenges due to concentrated poverty. The combination of zone and choice system can reinforce segregation due to the disparities between low-income and wealthy families in their ability to exercise choice.
 - **Community opposition:** Zoning of schools and school integration are often controlled by wealthy parents, often excluding low-income children in low performing schools and reinforcing divide. Many parents support the status quo and NIMBYism does not allow for the integration of schools and neighborhoods.
 - **Impediments to mobility to integrated and/or high opportunity areas:** Voucher holders face rent limits, discrimination, as well as cultural divides when using vouchers to move to opportunity neighborhoods. There is also a lack of knowledge by parents of school opportunities or housing services available to them.
 - **Loss of affordable housing:** There has been a lot of housing lost to gentrification, which has caused families to have to move and enroll in other schools, often in areas with more concentrated poverty. There is not enough affordable housing in higher income neighborhoods, preventing low-income families from moving into neighborhoods that could give them access to higher performing schools.

Existing Conditions

I. Understanding Data on Educational Outcomes

We heard the following from participants in response to how the initial data presented in the session reflects their understanding of disparities in access to quality education:

- **Residential vs. school segregation** ++ should be directly compared to better understand the how the two issues are interconnected. It would be useful to map areas that have high levels of residential segregation and low school segregation (and vice versa), and add qualitative data.
- **Enrollment numbers in gentrifying communities** ++ are important to analyze to determine if they have decreased due to displacement of low-income communities, which may contribute to insufficient resources in schools.
- **Additional data on choice is needed** ++, particularly focused on how choice is exercised, how choice varies by where people live, and how residency impacts parents' choices around charter and private schools (and vice versa). More data is also needed to understand potential disparities in travel time to and from school.
- **English Language Learners (ELL)** ++: The data presented on 4th grade students might not tell the whole story, since older ELL students that arrive to the U.S. at an older age may show different results. Also, ELL determination might not be valid and might not include all the children that actually need to be enrolled in the program.
- **High school graduation rates** ++ could be used to measure trajectory and opportunity. The analysis could compare differences between students attending high schools in their district vs. utilizing choice.
- **Need for alternative standard measures of proficiency beyond testing:** Not all students score well for various reasons, but bring other abilities in their classrooms and projects (class work, project-based activities) that are not measured through testing. Analysis should take into account additional burdens schools with high concentration of poverty face. School attendance (absenteeism) can also be an important measure for proficiency.
- **School performance statistics can reinforce segregation:** Participants want more information on how data on school performance is affecting parents' decision to exercise choice.
- **Need further analysis of District 75,** because it serves students with specific learning needs and is non-geographic so that students cross districts. It is important to look at where different services that are provided, and why students might or might not attend their local school.
- **Suggestion to include qualitative study on homeless families** and how they navigate the school system.

II. Understanding Unique Challenges Faced by Focus Populations

Participants noted the following unique needs or challenges faced by specific populations:

- **Economically disadvantaged:** The concentration of low-income people leads to concentration of chronic stresses in schools. Students in these schools need social services and experienced and committed teachers who can differentiate instruction and are competent to deal with a child in trauma or emotional crisis (e.g., with incarcerated parents, food insecurity). These students also need additional academic interventions and after-school enrichment. Parents in economically disadvantaged neighborhoods lack information about choice and opportunity schools, making it hard for families to exercise choice. If children in these neighborhoods do attend "high-end schools," they often face stigma in their own community or bullying at the new school. Family culture and neighborhood norms influences where children go to school.
- **Populations with disabilities:** Majority of school buildings in low-income neighborhoods are inaccessible to students, teachers, and parents with physical/sensory disabilities. This makes students with special needs look for services outside of their districts. Individualized Education Program (IEP) children might not attend their local schools and need to travel far because their needs are not offered.

- **ELL and immigrant families** exercise choice at lower rates. Limited English skills and lack of familiarity with the process make it difficult for immigrant parents, who often rely on the children for information and translation, to navigate the choice system.
- **Homeless students:** Temporary housing is concentrated in specific neighborhoods. Housing instability contributes to absenteeism, which affects academic success. Academic liaisons in shelters are not providing right information about school options.
- **Low-income families in high opportunity areas / schools:** Students may encounter racism, and staff and teachers aren't trained to address the issues. Students and parents may feel isolation and lack a sense of belonging. Some low-income families face difficulties affording groceries and other amenities in high opportunity areas, which tend to be more expensive.

III. Analyzing Relationship between Segregated/Integrated Living Patterns and Quality Education

Participants noted the following as important to understanding how where we live affects access to quality education:

- **Concentration of poverty leads to compounding challenges in schools ++:** Schools in areas of concentrated poverty face heavy staff, teacher, and principal turnover. Lack of experienced and consistent teachers becomes especially problematic for children with special needs who come from challenging home environments. Furthermore, local leaders – directors of organizations that provide afterschool programming and principals – do not coordinate on lesson plans and student learning needs. In the past, poverty was more dispersed and less concentrated, but this concentration is worsened by gentrification and displacement. Some participants highlighted the importance of the need for school integration because lower income students can benefit from the resources that higher income students have.
- **School choice coupled with admission processes that preference residency within zones can reinforce segregation ++:** The existing school zoning system allows for wealthy, privileged families to dominate good schools (increasing housing demand in these zones) and to leave districts that are lower performing, exacerbating inequalities and reinforcing both neighborhood and school segregation. Choice policies allow White middle/higher income families in diverse neighborhoods to move their children away from Black/Latinx children. Lower-income and immigrant families often do not exercise choice due to lack of knowledge of choice and opportunity; challenges navigating the system (due to time, capital, and language barriers); fear of isolation; and potential challenges around distance/isolation from proficient schools. Many participants believed the system would be less segregated if families did not have the option to choose and just went to their neighborhood schools.
- **Gentrifying communities ++:** Gentrification often does not lead to school integration or improved schools, as new wealthier families often send their kids out of the district into better schools. Furthermore, displacement can lower enrollment, which affects funding. There is a concern that integration is only thought of Whites coming into neighborhoods causing displacement, or moving children of color into White neighborhoods, away from their communities.
- **Lack of diversity and integration influence where students go to school:** Black and Latinx kids are more likely to live in neighborhoods with higher poverty and attend segregated schools with lower resources. Black and Latinx students face barriers accessing other opportunity without quality schools.
- **Lack of cultural competency can reinforce patterns of segregation:** Predominantly White schools can be a hostile place for children of color, which can lead parents of children of color to choose schools with more students and staff who look like them. Guidance counselors are not often culturally competent and do not know how to deal with identity challenges students of color might face. Teachers are often trained in pedagogy that comes from White normativity/supremacy that shows up in the curriculum and in their communication. This can perpetuate a deficiency narrative amongst students of color that can impact their sense of belonging and school performance.
- **Location of accessible schools:** Accessible schools are mostly located in high income neighborhoods (e.g. Lower Manhattan), forcing students with disabilities to have to seek services and accessible schools outside of their neighborhood. Lower-income schools might also lack the services special needs students need.

IV. Identifying Future Trends

Participants noted that the following future trends may further impact educational disparities:

- The concentration of wealth will continue to increase disparities in neighborhoods and schools.
- The country and the world are urbanizing, more people are living in cities and moving away from suburban areas.
- Charter schools numbers are increasing in low-income neighborhoods. Charter schools might not be open to all students, and take away students and resources from neighborhood public schools.

Understanding and Prioritizing Contributing Factors

Below is a summary of what participants discussed regarding each of the contributing factors driving disparities in access to quality education. The contributing factors below are listed in order of how participants prioritized them across break-out tables, from highest to lowest number of individual votes.

Location and type of affordable housing (17 votes)

- **Concentration of affordable housing in low-income neighborhoods ++** reinforces patterns of segregation by concentrating students living in poverty in certain schools, this included historic placement like NYCHA campuses. The concentration of populations with low educational levels can also influence students' educational achievements. Furthermore, schools around NYCHA development often have broken-down facilities and inadequate conditions for children to learn in, regardless of programming quality.
- **Lack of affordable housing in neighborhoods with quality schools:** A participant reported his students had to move away from Flushing (where they attended quality schools) to the Bronx because of a lack of affordable housing in Flushing.
- **Allocation of affordable housing:** Qualified Allocation Plans (QAPs) do not necessarily allocate points to applications based on quality of schools. There is a lack of scrutiny about how many points are allocated to projects based on school quality.
- **Shelter placement and relationship with schools:** Though shelters are not permanent affordable housing, the location of shelters impacts a homeless child's access to quality education. The current City policy allows for families in shelter to get housing placement near where the youngest child goes to school, but HRA is not always able to commit to this due to limited availability of school space, lack of transportation, and lack of coordination across agencies (DOE and HRA) to ensure that schooling and housing options are convenient to the family. This limits the school choice and continuity of education for children in the shelter system.

Location of proficient schools and school assignment policies (17 votes)

- **School zoning and choice policies ++:** The combination of zoning and choice increases segregation and limits access to proficient schools. Proficient schools are dominated by wealthy, privileged families who often control PTAs and influence rezoning of school districts. In gentrified neighborhoods like Harlem, higher income families exercise choice to leave the neighborhood schools, while families living in local public housing often do not exercise that choice.
- **Accessible schools ++:** Lower income neighborhoods usually have inaccessible facilities for children with disabilities, forcing students to attend a school outside of their own neighborhoods.
- **Residential preference:** Some participants felt that a policy like residential preferences for schools in high opportunity areas can limit access to poor students, while others referenced some quality schools located in low-income communities (like Bronx Science), where residential preference (beyond exam) could boost diversity and local students' access to the school.
- **Test scores and grades:** Selection policies based on test scores and grades can further segregate schools because they prevent Black/Latinx children, who have not had the opportunity to attend proficient schools, from accessing specialized schools. Some participants believe the system is designed to segregate Black/Latinx students from White students.

- **Rise of charter schools in low-income neighborhoods:** Low-income families, who often do not exercise choice within the public school system, are more and more likely to send their children to charter schools. More families sending their children to their local charter takes away from investment in low performing public schools, decreasing resources.
- **Location of well-resourced schools** is concentrated in mostly in White, affluent neighborhoods that lack socioeconomic and racial diversity. There is a lack of investment in the quality of schools in low-income neighborhoods.

Community opposition (13 votes)

- **Integration efforts ++:** Predominantly White and affluent communities often block attempts for integration in schools that would provide low-income communities increased access to quality schools (e.g., rezoning of schools, bussing students, or shelters in their neighborhood). Often school integration efforts are viewed by White families as taking opportunities away from their kids. NIMBYism is often centered on not wanting particular groups of people in a neighborhood, and there is a lack of willingness to have conversations about racial tension.
- **Inequity around civic participation:** Parents that have lower educational attainment or need to spend extended hours at work face barriers in advocating for their children and fighting community opposition. Advocacy voices often do not represent broad interests or interests of those in with the most need.
- **Bullying as a form of student opposition that reinforces segregation:** Discrimination within schools through bullying can lead families to remain within their segregated neighborhoods instead of exercising choice.

Impediments to mobility to integrated and/or high opportunity areas (11 votes)

- **Lack of education and assistance for parents with vouchers ++** on how to use their voucher to direct their children to opportunity schools.
- **Vouchers cannot be used to access neighborhoods with great schools ++:** Vouchers can limit access to high opportunity neighborhoods, which are often more expensive. Voucher holders also face private source-of-income discrimination, and voucher holders are often not aware of or choose not to exercise their rights to fight discrimination. Participants believe the City lacks an expansive program to encourage mobility.
- **Counseling parents on services:** Low-income families that move to high income neighborhoods do not get enough counseling around services and often face stigma when accessing services.
- **Lack of counseling and support for families to integrate with cultural barriers:** Meaningful mobility is more than spatial; mobility demands that residents cross cultural divides, and government often fails to understand this dynamic.

Loss of affordable housing (11 votes)

Table 2 combined this contributing factor with public private investment and lack of access to opportunity due to high housing cost.

Table 3 combined loss of affordable housing with location and type of affordable housing, and lack of access to opportunity due to high housing cost.

Table 1 did not get to discuss.

Private discrimination (10 votes)

- **Lack of enforcement of anti-discrimination laws** make it challenging for protected classes to access areas with quality schools. Enforcement is difficult because people are covertly discriminating.
- **Discrimination presents itself in different ways** and people are not always aware that they are being discriminated against, but testing shows that it still exists. Discrimination is happening based on race, criminal record, economic status, credit history, and source of income, which disproportionately affect people of color.
- **Access to brokers for higher income families** can facilitate racial steering. Some affluent families hire consultants to help them decide where to invest in real estate for their children or future children to have access to a “good school zone.”

- **Co-op buildings:** There's no co-op disclosure, which facilitates private discrimination and prevents people that may want to move to opportunity areas from doing so.

Lack of public/private investment in specific neighborhoods (9 votes)

- **Investments and maintenance:** There's a lack of investment and maintenance of amenities and schools in neighborhoods with low income families. There is a lack of community-driven investments in low-income areas, where students face compounding challenges.
- **Who is expected to move to promote integration / access resources:** There is a concern among participants that integration is only thought as moving children of color into White neighborhoods, or Whites coming into neighborhoods causing displacement.
- **Challenges to investment:** If community does not have investment, it hurts social cohesion. Public/private investment is challenging because it can lead to gentrification and displacement. Revitalization approach should not be thought of from a deficit model, where residents feel like the makeup of the neighborhood needs to be replaced to be "revitalized."

Lending discrimination (8 votes)

- **Racial wealth gap:** Lending discrimination furthers the racial wealth gap and prevents the intergenerational transfer of wealth.
- **Ties inability to invest in communities:** If you cannot get a loan due to your protected class status, it prevents you from investing in the revitalization your community.

Lack of access to opportunity due to high housing cost (8 votes)

- **High housing cost communities** with excellent schools makes these educational resources inaccessible to low-income people.

Lack of local or regional cooperation (6 votes)

- **Lack of cooperation between cities and suburban areas** prevents people from have access to information to make an informed choice about moving to suburbs, if they wanted to. There are barriers to build affordable housing in suburban communities, which prevents mobility for people who would make the move to those areas. Other barriers include the non-acceptance of vouchers, community preference policies in suburban communities that may perpetuate segregation, and exclusionary zoning that restricts multi-family housing.

Land use and zoning laws (4 votes)

- **Can be used to perpetuate segregated housing and thus segregated schools.**
- **Poor calculation for school seats** can lead some areas with high development of housing to lack adequate schools capacity nearby.
- **Rezoning for Mandatory Inclusionary Housing (MIH)** continues to prioritize neighborhoods where schools are lower quality. This rezoning of low-income neighborhoods could create market changes that lead to increased displacement and the further concentration of poverty, which has disproportionate impacts on schools in low-income communities. Beyond calculating potential new seats needed, there is a lack of comprehensive investment in existing schools and other amenities for low-income families in rezoned neighborhoods.

Availability, type, frequency, and reliability of public transportation (3 votes)

- **Exercising choice:** A family's ability to exercise choice can be limited by public transit availability and accessibility, since it can be difficult to move between boroughs. This is especially true in parts of Southern Queens and Staten Island.
- **Accessibility for parent participation:** Panel for Educational Policy (PEP) meetings are often held at a location that is a 20 minute walk to the nearest bus station, for example.
- **Bussing for general education students:** DOE does not provide buses for this population, who may still need more affordable transit.

Lack of community revitalization strategies (3 votes)

- *See lack of public/private investments and lending discrimination.*

Occupancy codes and restrictions (2 votes)

- **Restrictions in occupancy for senior housing** does not allow families to live with grandparents, who might live in in quality school zones, to be able to access better quality education.

School performance measures

- **Test scores and school performance statistics can reinforce segregation** by increasing demand for certain schools, as parents exercise choice to get out of sending their children to lower scoring schools. There is a lack of emphasis on other evaluative measures of school quality beyond test scores for parents to reference.

Where We Live NYC

Topic-Based Roundtable D: Environment, Health, and Safety Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Environment, Health, and Safety Learn Phase Roundtable that took place on June 22, 2018.

(++) indicates that this idea was discussed at multiple tables

Key Takeaways

- Participants stressed the connection between unstable housing, economic insecurity, and poor individual/neighborhood health. There are severe mental, physical, and emotional health impacts of living in poverty that can lead to unhealthy/unsafe behaviors and negative environments. These impacts can be exacerbated by neighborhood change and gentrification, which can increase housing instability and stress, and fray social networks that protect against negative health outcomes.
- While there are unique barriers faced by each population, participants stressed that residents often experience compounding health, safety, and housing challenges due to the intersectional identities and characteristics.
- Overall, here are the top six contributing factors to disparities in access to safe and healthy environments identified by participants:
 - **Lack of access to opportunity due to high housing costs** impacts the ability of people to afford healthcare and high quality food, or be able to save money to move to better environments. High housing costs relative to income force people to make tradeoffs that can jeopardize their health and safety, such as turning to illegal activities for additional income or escape.
 - **Loss of affordable housing** leads to displacement and overcrowding as people have to double-up, resulting in increased stress for families and the heightened potential for violence. Participants believe there is a failure to enforce rent-stabilization and close loopholes that lead to tenant harassment, intimidation, rent increases, and deregulation, which results in displacement, neighborhood destabilization, and negative health impacts for tenants.
 - **Lack of public/private investments in specific neighborhoods** that will strategically benefit low-income residents (equitable investment), rather than change neighborhood make-up. There is a lack of investments in schools, parks, recreation centers, gardens, social services, quality healthcare, and other infrastructure in these areas, limiting opportunity for advancement.
 - **Community opposition** leads to an imbalance of power between White communities and communities of color, which reinforces concentration of noxious and unwanted uses in low-income communities of color, undermining a fair share approach. Opposition to affordable housing and shelters in high opportunity areas, largely based on stereotypes, limits low-income families' access to new resources and services that can positively impact their health.
 - **Private discrimination** and bias against specific groups leads to reduced housing choice and enclaves of poverty (often, "food swamps" or areas with other public health challenges). This particularly impacts people of color, immigrants, families with children, people with disabilities, and LGBTQ individuals. The lack of enforcement against discrimination based on credit score, justice-involved status, and source of income produces disparate racial outcomes. Landlords harass and intimidate tenants (e.g., elderly, LEP individuals) to get them out of their apartments, which is a direct threat to their sense of security, safety, and mental health.
 - **Location and type of affordable housing:** Forces like zoning, public opposition, and costs/incentives lead to the concentration of affordable housing in areas already experiencing high poverty with unhealthy or hazardous environments. There is an insufficient supply of deeply affordable housing as well as accessible affordable housing, which limits choice for people with disabilities. Concentration of poverty also creates a strain on healthcare service providers with limited resources.

Existing Conditions

I. Understanding Data on Access to Safe and Healthy Environments

We heard the following from participants in response to how the initial data presented in the session reflects their understanding of disparities in access to safe and healthy environments:

- **There is a connection between housing stability and health ++** and changes in a neighborhood's housing affordability can be a catalyst for other health issues. For example, loss of affordable housing can contribute to high rent burden, overcrowding, housing quality issues, increases stress, and potentially displacement to areas that are less safe and healthy.
- **Neighborhood change and the risks of displacement impact wellbeing ++**, particularly for seniors or others who depend on others for support. When people are forced to leave neighborhoods, or lose their amenities and neighbors, they lose their sense of community and social support networks.
- **Income disparity can be a health determinant ++** since the effects of living in concentrated poverty, especially adjacent to wealth, can cause stress, depression, anxiety, and other mental health issues. These health challenges can in turn trigger chronic conditions, or potentially cause people to turn to violence and crime. Participants are interested in seeing data on whether the lowest income populations have better health outcomes in mixed income developments vs. developments that are only low income.
- **Census categories and geographies may not capture differences ++**, especially between immigrant communities versus non-immigrant communities. For example, African American, Afro-Caribbean, and African immigrants are all categorized together in the data, but may have very different lived experiences. Spatial data in mixed-racial/ethnic neighborhoods that take an average of the area may hide actual disparities between groups. Additionally, it is important to be aware of intersectional identities, as individuals fall into different subcategories and may be impacted by compounding barriers connected to multiple identities.
- **Quality of open space is not captured in the data.** There are disparities in access to water fountains, benches, shade, or bathrooms, which are especially important for seniors and people with disabilities. Most parks lack equipment for children with disabilities. Not having trees or green space can also negatively impact mental health. Data analysis could also explore whether activated public spaces versus vacant lots create different safety outcomes.
- **Quality of medical care** in high-density poor neighborhoods usually is lower, in part due to lack of resources and higher caseloads for health services. This contributes to high numbers of emergency room visits instead of using preventative care.
- **Need to look at location of vulnerable infrastructure (largely in communities of color), in relation to potential storm surge.** Storm surges can release toxic chemicals from Significant Maritime Industrial Areas (SMIAs) into the environment and affect food sources, create power outages, and affect surrounding communities.
- **Social networks impact people's ability to access aid and support during disaster.** For example, after Hurricane Sandy, communities in NYCHA developments with stronger social networks, such as organized tenant associations, were more resilient and recovered faster. This is especially important for seniors and the disabled. Displacement can cause people to lose the social networks they depend on.
- **Data on poor air quality does not fully reflect the contributors to childhood asthma.** For example, in Manhattan, there is poor air quality, but the asthma rates are not high. Therefore, another factor may be in play, such as children in Lower Manhattan (a predominantly White area) having better access to healthcare. High childhood asthma rates could also be caused by poor indoor air quality due to mold, maintenance deficiencies, pests, and smoke.
- **Need to look at quality of the housing stock, which affects health.** Deteriorated housing stock leads to more negative health effects, including chronic stress and asthma.
- **Public data does not capture vehicular traffic's impact on health and safety.** Air quality, high rates of vehicular traffic and collisions, and noise pollution are causes of stress.
- **Need to look at racial disparities in incarceration rates by type of crime**, e.g., comparing who is arrested or not arrested for minor crimes. Exposure to crime, violence, and disproportionate incarceration can have long-term impacts, like Post Traumatic Stress Disorder.

- **Neighborhood change also lead to changes in policing.** When there is gentrification, there is often heavier policing due to an influx of new White neighbors that may call the police on existing neighbors without knowing the history and culture of the neighborhood. Policing is a tool used by new, White tenants to control the behavior of non-White residents.
- **There is a lack of data on where people are going post-incarceration.** Many people double-up with relatives or friends, or turn to shelter.

Participants suggest the City reference the following additional studies, data sources, or analysis:

- New School, which did a study on mental health and relationship to housing and displacement.
- Alex Schwartz and Rachel Meltzer did a study that found that higher rents are associated with health conditions. It is important to look at whether higher quality housing leads to better health outcomes.
- Imagenycmap.org overlays health indicators with community assets.
- Stonewall survey and report, which looks at the unique challenges in housing and healthcare for LGBTQ elders: stonewallcdc.org.
- U Penn study on social impact of the arts, which found that health outcomes were better than expected in areas with robust cultural assets.
- Environmental Justice Alliance work on industrial areas in the flood plain.

II. Analyzing Unique Challenges Faced by Focus Populations

Participants noted the following unique needs or challenges faced by specific populations:

- **Populations with disabilities:**
 - Face challenges accessing healthy and socially integrated environments with opportunities for social interaction. Physical barriers in the building, medical facilities, grocery stores, and transit prevent people with disabilities from leaving their homes, accessing healthy food, getting exercise, and interacting with community members. Inaccessible housing and neighborhoods lead to isolation and worse health outcomes. This is also true for the elderly.
 - Encounter unwelcoming environments in healthcare settings – both physically and socially – due to lack of training for staff.
- **Individuals with severe mental illness and substance use disorders:**
 - Face a lack of services and support, especially those without a home and those recovering from drug addiction. Access to good quality mental healthcare is still challenging. For example, Woodhull Hospital often dismisses people with mental health issues.
 - The lack of support leads them to be outside on the streets during the day, creating unsafe environments and potentially causing them to get caught up in the criminal justice system.
- **Immigrants and populations with Limited English Proficiency (LEP):**
 - Often do not have access to culturally and linguistically appropriate services at clinical health facilities.
 - Face threats from landlords calling Immigration and Customs Enforcement (ICE) in retaliation against housing complaints. Landlords use ICE and deportation as a discriminatory tactic, which is a direct threat to their safety and security.
 - Can experience negative interactions with police, as misunderstandings due to language barriers can turn a misdemeanor into a felony charge. Police officers lack fluency in understanding verbal and non-verbal communication of immigrant populations.
- **Residents of different types of public housing:**
 - Face ongoing issues of mold and asbestos in NYCHA apartments. NYCHA has not adequately remediated mold and asbestos, and there has not been a systemic change in maintenance procedures.
 - Voucher holders often can only find housing options in less healthy, low-income neighborhoods in Bronx, parts of Staten Island, and parts of East Brooklyn and Queens – this may separate them from their community or land them in areas that are less healthy and safe.

- **Homeless households:**
 - Especially children growing up in shelter may not have the opportunity to eat healthy, home cooked meals, which presents major health risks.
 - Experience a lack of privacy and reduced level of safety due to the current design and layout of shelters.
- **Youth in low-income communities:**
 - Have access to limited facilities for recreation, housing, healthcare, and education, especially during the critical hours of afternoon and early evening.
 - Are less likely to get diagnosed with mental health issues because of lack of access to services, support, and therapy.
 - Face challenges affording transportation. Youth may resort to jumping turnstiles and risk getting citations for misdemeanors that can lead to incarceration.
- **Justice-Involved:**
 - Face challenges in finding re-entry housing, leading justice-involved populations to turn to shelter, or double-up (even triple-up) in public housing, which may lead to recidivism due to proximity to crime.
 - Face limited publicly-supported housing options due to NYCHA's permanent exclusion policy, which prevents people who committed a felony from moving back into NYCHA. The doubling or tripling up may put the head of a NYCHA household, often seniors, at risk of losing their housing, as they are taking in someone who is permanently excluded.
- **Survivors of Domestic Violence:**
 - May stay in abusive relationships, or risk their safety and wellbeing, due to lack of affordable housing options.
- **LGBTQ individuals:**
 - Experience both bigoted violence and disproportionate policing. There is also a lack of data on LGBTQ populations that can track the disparities, particularly health and safety outcomes.

III. Identifying Future Trends

Participants noted the following future trends may further impact disparities in access to safe and healthy environments:

- **Climate change** may lead to increased natural disasters and higher heat levels, which has disproportionate impacts on certain populations. For example, seniors living in NYCHA developments are particularly vulnerable to high heat.
- **Overcrowding:** Rising housing costs and the resulting displacement will force more households to double-up.
- **Changing household composition:** There will be more multi-generational families and multi-adult households in the future.
- **Justice-related services for youth** are being reduced because youth are no longer charged as adults at age 16.
- **Militarization of police ++:** Police are increasingly looking to the military for training and equipment, which often conflicts with community policing and can lead to more negative police interactions.
- **Higher education is increasingly requirements for family-supporting employment**, which will have a greater impact on families with lower literacy and/or educational attainment levels (many of whom are people of color and immigrants). Lower wages and unemployment can contribute to disparities in accessing health opportunities like healthy food, quality healthcare, and safe and high-quality housing.

Understanding and Prioritizing Contributing Factors

Below is a summary of what participants discussed regarding each of the contributing factors driving disparities in accessing healthy and safe environments. The contributing factors below are listed in order of how participants prioritized them across break-out tables, from highest to lowest number of individual votes.

Lack of access to opportunity due to high housing costs (20 votes)

- **High housing costs relative to income forces people to make tradeoffs that risk their health and safety ++:** Paying 50-60% of income on rent, with already low incomes, impacts resident's ability to afford essentials like healthcare or healthy food. Residents often have to make daily choices between eating or paying the light bill, which can also lead to high stress levels. To survive high housing costs relative to low wages, residents stay in abusive relationships or turn to other ways to make ends meet – including illegal activities as a source of income or escape. These can jeopardize personal health and safety, increase the risk of arrest and incarceration, and undermine social cohesion in families and the neighborhood.
- **Housing instability** can also result from high costs, making families who experience an illness or job loss susceptible to homelessness, because the high costs of rent has diminished their savings or is impossible to cover without income.
- **Rapid gentrification of quality neighborhoods ++** leads residents to move away from quality neighborhoods such as the Lower East Side, and Central Brooklyn because of unaffordability. Many longtime residents fought and put in sweat equity for years to revitalize these areas, and their displacement breaks community networks. This displacement results in residents moving to lower-income neighborhoods or outside of New York City to places like Delaware and Pennsylvania that they can afford. This trend further concentrates poverty in the few affordable areas, like the South Bronx. Bringing better quality amenities and health services into low income communities can also trigger housing costs to rise and bring in new comers who can afford it.
- **Unaffordable amenities in high housing cost areas:** Affordable grocery stores and other amenities are often not available in areas with high housing costs. This particularly affects seniors who live in these areas, many of whom have to travel far to buy affordable food.
- **High costs prevent wealth building and mobility:** People who are severely rent burdened cannot afford to save in order to move to a high opportunity area with better environments.

Loss of affordable housing (13 votes)

- **Loss of affordable housing leads to unhealthy and unsafe conditions ++,** like more instances of overcrowding due to families doubling up. This leads to instability, stress, and other negative health outcomes. It can also triggers people to react in violent ways and create negative or unsafe domestic situations.
- **Lack of enforcement of rent stabilization laws ++:** Landlords use loopholes to harass and evict tenants, as well as deregulate rent stabilized units. This is compounded by tenants lack rights and power in the court system. There is a mental health impact of being constantly harassed, financially squeezed by landlords, and displaced from affordable housing.
- **Expiring affordable programs ++:** A lot of affordable housing is up for expiration and there are not sufficient incentives for community ownership and preservation of affordability that will keep residents stable in their homes and communities.
- **NYCHA deterioration** leads to a loss of a quality housing stock and public asset, which impacts the health of its residents.

Lack of public/private investment in specific neighborhoods (13 votes)

- **Investments in low-income neighborhoods are not benefiting low-income residents ++:** public and private investments can sometimes be misguided and lead to rising rents and displacement of low-income, long-time residents. For example, Industry City investments in Sunset Park are speeding up gentrification and not serving those most in need. When property values go up, there is an inability to capture the value for the existing community.

- **Lack of investments in schools and economic development in low-income areas ++:** low-quality schools and educational outcomes lead to other issues in the long term, impacting financial stability and health outcomes. Increasing these investments can help people to improve their economic and environmental circumstances.
- **Lack of city-wide strategy to proactively and equitably invest in neighborhoods:** Communities feel that in order to get investment, they need to agree to a rezoning and negotiate, while risking displacement. These neighborhoods lack investments in transit, public open spaces, recreation centers, libraries, hospitals, and other infrastructure, particularly in maintenance.
- **Lack of funding for NYCHA** for infrastructure and housing improvements.
- **Lack of value for investments to health beyond housing:** Investments in new housing or other top-down mechanisms tend to be valued higher than investments made by long-term community members. For example, community gardeners are losing their gardens to new housing developments.

Community opposition (12 votes)

- **Lack of fair share ++:** There are neighborhoods that are over-concentrated with supportive housing, shelters, waste transfer stations, or jails, while high income communities have none.
- **Inequality of power ++:** There is a lack of support for communities of color to organize to improve their community, or push back against organized White communities. Communities of color often do not have as much say in the siting of major infrastructures or facilities, which were historically sited in their neighborhoods. This may be due to a lack of sense of ownership/power, which leads communities of color to accept or be forced to accept what is given. This also has to do with housing instability, these lower-income communities are focused on surviving, rather than community visioning and advocacy. Meanwhile, White communities have the financial/political power, and organizing capacity to oppose.
- **Opposition to affordable housing/shelter in high opportunity areas++** limits low income families' ability to access these resources. Community preference is being seen as anti-fair housing and is under litigation, but it was never intended to do that; community preference in many neighborhoods leads people to welcome affordable housing.
- **Lack of education around stereotypes and empathy to promote inclusivity and combat opposition++**, especially stereotypes around people in shelters, LGBTQ populations, and others in need of supportive housing.

Private discrimination (10 votes)

- **Bias against specific groups that leads to less housing choice and isolation in poverty enclaves.** Overt bigotry is becoming more extreme (aspect of Trump-era politics), which shows up in housing. This impacts people of color, immigrants, families, people with disabilities (including those with service animals), LGBTQ individuals/couples, and more.
Discrimination based on credit score, justice-involved status, presence of children, and source of income produce racial disparities. There are not sufficient resources to enforce.
- **Harassment and intimidation** by landlords against people who are non-English speaking displace them out of their apartments and cause stress and other mental health outcomes.

Location and type of affordable housing (9 votes)

- **Lack of strategy to prioritize building low and extremely-low income housing in healthy and good neighborhoods ++** due to opposition, cost/incentives, and Qualified Allocation Plan (QAP) criteria. This limits residents' access to these opportunities. QAP impacts where funds are allocated and where the affordable housing development community can afford to build, which are often not the best locations for supporting low-income people or people with disabilities. Market-based programs implemented in high opportunity areas do not create enough units at a range of incomes to meet needs.
- **Affordable housing was historically, and continues to be, built in areas where there are environmental health hazards**, which impact resident health. These hazards include bus depots, elevated trains (noise pollution), polluted waters, and waste transfer stations. The siting of environmental hazards also continues to happen in neighborhoods with a high concentration of public and affordable housing.

- **Participants expressed mixed views on the appropriate balance between meeting the need for more affordable housing and concentrated poverty in certain neighborhoods.** Fair housing advocates say building in already high poverty neighborhoods further concentrates people in low income communities, while some advocates argue for the need for even deeper affordability to meet the incomes of residents already living in these areas and prevent their displacement.
- **Lack of incentives for universal design:** The scarcity of accessible and affordable units limits the housing choices of people with disabilities. Many might need to live far from critical doctors and other support networks. There is a lack of incentives to promote universal design through QAP.
- **Concentration of affordable housing/shelter for low-income families can strain healthcare systems.** High concentrations of people who need services and not enough resources can impact the quality of healthcare available. This may further force people to go the emergency room, rather than use preventative care. Concentration of shelters in low income communities also adds stress to health services, as there are limited mental health providers.

Land use and zoning laws (8 votes)

- **Zoning laws impact land value, the siting of environmental health hazards, and the siting of affordable housing:** For example, zoning laws enforce single-family homes in certain areas and restrict multi-family developments, while in the same neighborhood, one block away, there may be a large public housing development on the same footprint.
- **Neighborhood rezonings** are implemented in low-income communities of color, but not in White and affluent communities. Some participants felt that these policies support (or do not discourage) gentrification and displacement. Participants felt there was a lack of a comprehensive planning framework (see “Lack of Legally-Binding Planning Framework” contributing factor for additional information).
- **Lack of public review for as-of-right developments:** The majority of development in NYC is market rate, as-of-right, making it impossible for communities to oppose. However, developments like supportive and affordable housing, happen as a ULURP process, making it easier to be opposed.
- **Lack of inclusive ULURP process:** The current process operates as a closed, insider negotiation on what investments a community should get. Higher income neighborhoods seem to always have a say in public investments coming to their neighborhood where as low-income communities have less say.
- **Environmental review for siting of hazardous facilities contributes to concentration of these uses.** Standards are looser in areas zoned for heavy industry. The structure of environmental review is regressive, and requirements for mitigation are loose. There is a lack of equity consideration in measuring impact/mitigation – for example, the burden is even higher for communities already facing other environmental justice issues.

Impediments to mobility to integrated and/or high opportunity areas (7 votes)

- **Voucher holders are limited to unhealthy, lower income neighborhoods because of the amount of the subsidy.** Most City vouchers pay less than \$1,500 for a 1-3 bedroom unit, which limits mobility to the Bronx, parts of Staten Island, and parts of East Brooklyn and Queens. Many of these neighborhoods are “food swamps” (have an overabundance of unhealthy foods) or have other health hazards. This is compounded by source of income discrimination.
- **Lack of deeply affordable housing in high opportunity areas:** Developments that include a low-income set aside – for example 80/20s are usually 60% of Area Median Income (AMI), remaining out of reach for the lowest income populations.

Lending discrimination (6 votes)

- **Lack of enforcement and accountability for banks.** Banks have an outsized impact on who lives where, but do not disclose enough information about how they lend.
- **Lack of attention to the wealth gap,** beyond income, and how that leads to inequities. Poor people face difficulties accessing loans or mortgages to help them build wealth and own their own homes, perhaps in better environments, which in turn affect their ability to live stable and healthy lives. Homeownership is nearly impossible, even for the middle class. Without intergenerational wealth (like

wealthy parents to help with a down payment on a home), many poor people, especially communities of color, rely more on lending, and are thus more vulnerable to discrimination and/or predatory lending.

Location of environmental hazards (6 votes)

- **Siting:** Many environmental health hazards, such as bus depots, sanitation facilities, highways, and waste facilities, have been sited in low-income communities of color, such as the South Bronx. By the same token, neighborhoods can become low-income because the environmental health hazards have been sited in those neighborhoods.
- **Lack of a plan that enforces equitable distribution (fair share)** of environmental health hazards. Everyone produces waste, but certain communities bear a disproportionate burden.
- **Limitations of zoning and environmental review process**, which do not weigh the high vulnerabilities and existing burden carried by low-income communities of color. There is also a lack of mitigation efforts and green infrastructure to address impacts of facilities such as highways, bus depots, or sanitation facilities, impacting the health of residents near these facilities.

Limited access to financial services (5 votes)

- **Lack of access to financial institutions, financial literacy/education, and poor credit** impacts low income community's ability to move up the social ladder, acquire housing, make home modifications, and be independent. There are also anxiety and mental health factors related to lack of access to financial services. The issues related to financial literacy are intergenerational. For example, a participant mentioned that parents in his use their children's social security number to open different accounts, which affects their children's credit when they are older.
- **Inability to invest in communities:** If people cannot access financial resources, they are not given the opportunity to invest in their community and make improvements to promote healthy and safe environments.

Other: Failed housing planning for the neediest (4 votes)

- **Lack of a citywide initiative that creates housing for people who fall in the less than 30% AMI bracket.** The limited investments targeting 30% of AMI and below is a missed policy opportunity to create a gateway to the middle class. These low-income residents are often dependent on welfare programs and shelters because of limited affordable housing options.

Other: Lack of a legally binding planning framework (4 votes)

- **Lack of a comprehensive ,community-based framework** to guide public/private investment decisions towards equity – including zoning along higher density transit lines, community benefits agreements, and rezoning White/affluent areas to apply mandatory Inclusionary Housing (MIH). There is a reluctance to upzone high opportunity and high environmental quality neighborhoods. Many communities have neighborhood plans, but the City has no requirement to consider them.

Other: Policing (4 votes)

- **Disproportionate policing of people of color:** Stop and frisks and heavier policing of certain populations, or in certain neighborhoods, leads to heavier incarceration and destabilized communities. Policing in White or gentrifying neighborhoods is often targeted to people of color – stopped by police and asked for ID frequently.
- **Police officers lack cultural competency, social work, and mediation training** to effectively de-escalate situations and work with populations with Limited English Proficiency. Young people also have their own language/slang that can lead to further citations and risk heavier penalties. Police also lack training when it comes to engaging with survivors of domestic violence, LGBTQ populations, and those with chronic mental illness.
- **Militarization of police:** Police tend to be paramilitary and this does not foster the development of a safe community infrastructure. There is a lack of trust or inclination to engage with police, particularly by communities of color.
- **Lack of focus on restorative justice models and policing alternatives.** There is resistance to moving from policing to policing alternatives, including focusing on communities and resources.

Furthermore, attempts to bring in innovative facilities and models can face local opposition because people conflate it with a concentration of prison/jail facilities in a neighborhood, even though the model is very different.

Availability, type, frequency, and reliability of public transportation (4 votes)

- **Impacts where people chose to move, and thus the value of the area.** Slow and unreliable mass transit in certain areas also impact people's ability to access recreation and other healthcare resources.
- **Lack of accessibility** limits mobility for people with disabilities to access healthcare and other needs.

Lack of local or regional cooperation (3 votes)

- **Lack of funding, taxation, and good regional managers targeted to affordable housing and healthy neighborhoods.** There is not a regional valuing of decent housing as a right/entitlement.
- **LGBTQ protections:** Exist locally, but do not correlate to state or federal protections. There is a gap in policies at the regional and local level.

Other: Indoor environmental hazards (3 votes)

- **Exposure to hazards:** Low income communities in public housing are overexposed to hazards such as mold and lead paint, which causes learning disabilities and other mental health issues, especially for young children. Vacancy rates are low, so people often feel like they have no choice but to accept whatever is offered.
- **Poor indoor housing quality** – including lack of privacy, safety, and security – can cause stress and trigger people to react in negative ways, including violent incidents.

Occupancy codes and restrictions (2 votes)

- **Lack of protections** for tenants in illegal basement units, which are a source of affordable housing, especially for immigrant groups and justice-involved. Lack of programs to bring illegal basement units up to code and make them safe.

Other: Funding and taxes (1 vote)

- **Lack of government funding** and resources for affordable housing.

Lack of community revitalization strategies (1 vote)

- Disempowers existing communities to plan for neighborhood growth and future improvement.

Where We Live NYC

Topic-Based Roundtable E: Employment & Economic Opportunity Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Employment and Economic Learn Phase Roundtable that took place on July 12, 2018, supplemented by feedback we collected during a smaller discussion with staff in the NYCHA Office of Resident Economic Empowerment & Sustainability (REES).

(++) indicates that this idea was discussed at multiple tables

Key Takeaways

- Participants expressed that stagnant wages relative to the high costs of housing, childcare, higher education, and health care in New York City – including the cost of travel time to access these resources – are directly connected to employment disparities and limited economic mobility. These disparities are acutely felt by recipients of public assistance programs, who often have to make difficult trade-offs like turning down higher income jobs or deciding not to participate in the labor force to avoid losing the benefits, care, and safety nets they need.
- Participants emphasized the role of community networks as social capital for economic opportunity. Segregation and the concentration of wealth and poverty impacts an individual's exposure and connections to career paths, high-paying jobs, and supportive institutions. In high poverty areas, community networks help create a safety net to survive poverty, but these relationships can be vulnerable to disruption due to gentrification and displacement.
- Participants encouraged further analysis of economic disparities that might exist for immigrants and different household types (like single-mother households); disparities in credit scores; disparities in generational wealth and debt for households; and how disparities have changed over time to better understand how neighborhood change may impact these numbers.
- Overall, here are the top six contributing factors to disparities in access to employment and economic opportunity identified by participants:
 - **Loss of affordable housing** contributes to high housing costs, housing instability, displacement, and concentration of low-income residents into lower opportunity areas. When low-income families are paying higher amounts for housing, they are not saving or investing in opportunities like education or training programs.
 - **Lack of public/private investments in specific neighborhoods:** Investments in schools, transit, childcare, health services, accessibility, and housing stock can impact access to employment, job performance, job security, and net income. Residents often feel that investments only come with the trade-off of increased density, and there are limited requirements for private developers and companies to reinvest in economic opportunities for communities.
 - **Private discrimination** can act as a barrier to economic opportunity in housing, in the workplace, and in accessing capital. For example, housing voucher holders have difficulty finding housing due to discrimination, which hurts their housing and job stability, or homebuyers of color face racial steering into neighborhoods where homes do not appreciate as quickly. Participants also shared examples of employment discrimination that are often hard to identify or track.
 - **Lack of job training programs:** Participants emphasized a lack of quality in existing programs, highlighting the ineffectiveness of many training opportunities and lack of coordination between government agencies to create career pathways into emerging industries. Many of the programs currently offered are training participants for low-wage jobs that do not help low-income families overcome poverty, and there is a lack of incentives for companies to provide internal trainings to build the skills of local residents. Furthermore, the City lacks a comprehensive plan to provide the resources needed to accompany job training, such as childcare support, transit subsidies, paid training, and financial education.

- **Availability, type, frequency, and reliability of public transportation:** There are too many stations that are not accessible, especially in areas with the highest amount of people with disabilities, which becomes a major barrier to their ability to access and retain employment. Transit costs are regressive – low-income New Yorkers pay more due to their concentration in neighborhoods far from transit hubs or with unreliable transportation, and many also have difficulty paying higher costs upfront for monthly metro passes. All of this can impact job security and net income.
- **Lack of access to opportunity due to high housing cost:** High housing costs force families to spend more on housing, which takes away from childcare, savings, and educational opportunities. Homeownership, when available, used to be a vehicle for working class communities of color to be able to build wealth and pass it on to future generations, which is almost impossible now for working class New Yorkers.

Existing Conditions

I. Understanding Data on Access to Employment & Economic Opportunity:

We heard the following from participants in response to how the initial data presented in the session reflects their understanding of disparities in access to employment and economic opportunity:

- **Need to go beyond location of jobs to spatially analyze salaries and the types of jobs available ++:** This analysis could include whether jobs are full-time, salary levels, benefits, educational requirements, and who is accessing these jobs. Residents living in employment hubs may not be able to access the jobs located around them, so proximity is not a great indicator. Underemployment should also be analyzed. Many homeless and low-income individuals are working, but their incomes are not high enough to support a family. The jobs they have access to are limited to sectors like physical labor, homecare, and retail.
- **Need to understand access to related opportunities like childcare, broadband internet, healthcare, and healthy food ++,** which can impact labor force participation, performance at work, and earning potential. These additional costs can also impact residents' ability to pursue apprenticeship programs or further education, and can reinforce patterns of intergenerational poverty. The combination of these systemic issues can particularly impact women and communities of color.
- **Lack of data on immigrant workers and different household types ++:** There is a need to better understand disparities in the labor market for immigrants vs. native born New Yorkers, lifelong New Yorkers vs. transplants, and two-earner household vs. single-headed female households.
- **Need to capture disparities in household wealth ++,** which can be passed down through generations (historically concentrated with White families) and can widen economic disparities. Affordable homeownership has not been a key priority of the City, but it is an opportunity to address the racial wealth gap. Due to segregation, communities of color also have had lower rates of appreciation, and owners may not be able to get the same financial benefits as white owners. Also, need more data on impacts of foreclosure and predatory lending.
- **Need to analyze relationship between neighborhood change and employment:** Need data that shows the influence of neighborhood change on employment patterns. Data over time in gentrifying neighborhoods may show improvements in wages and job growth, but it may reflect changes in who lives in the neighborhood rather than improvements in economic outcomes for long-time residents.
- **Criminal justice disparities** have impacts on labor market participation for certain racial groups. Data on arrests and incarceration should be considered relevant to employment trends for individuals, their families, and communities. Studies show that majority of the reentry population were coming back to three parts of the Bronx, which concentrates economic burdens in these communities.
- **Need to overlay analysis of disparities in travel time in relation to wages:** Include analysis on where people commute for jobs, as well as information on any correlations between people living

and working in employment hub areas. Time is a resource and affects people showing up on time to interviews, work, or calculations on whether they should go back to school.

- **The map showing financial institutions may overstate access.** Services may not be offered in other languages, or may require minimum balances, high fees, or limited hours, making them inaccessible to people in the neighborhood. There is a need to also map cash checking and pawn shops to compare the location of these with access to traditional banking services. A participant noted that these institutions, though often vilified, are often more accessible to these communities because they have better hours and more relaxed identification requirements.
- **Analysis on credit scores needed:** credit is a barrier to accessing housing, homeownership, and access to affordable banking services. Difficulty getting a loan may lead people to turn to loan sharks or other risky, high-cost lending to pay for necessities.

Participants suggest the City reference the following additional studies, data sources, or analysis:

- The NYC Comptroller has report on gentrifying neighborhoods and employment patterns, as well as credit scores.
- The Center for NYC Neighborhoods has data on home foreclosures and repairs.
- There is NYPD data showing communities, levels of crime, and crime reduction, which led to increase in real estate prices.
- “Million Dollar Block Map” illustrates the blocks where people reenter into the justice system.
- Office of Financial Empowerment recently released a report on debt and its impact on rental arrears, the ability to gain a mortgage (debt/income ratio), and credit history.
- *Evicted* by Matthew Desmond, which shows impacts of eviction and racial disparities of who is targeted.

II. Analyzing Unique Challenges Faced by Focus Populations

Participants noted the following unique needs or challenges faced by specific populations:

- **People with disabilities**
 - **Heavily impacted by transportation delays, lack of accessible stations, and broken elevators.** People often need to leave 1.5 hours earlier and still arrive 30 minutes or more late, which impacts work time and job security.
 - **Often need to keep their income low** in order to keep their Medicaid insurance and the care that they need, which are often not covered by private insurers.
 - **Have fewer employment options** due to lack of accessible and affordable housing options near areas with reliable and accessible transit.
- **Residents of publicly-supported housing**
 - **There is limited upward mobility in public housing.** Resources are spent around policing but not enough in access to technology and advising on academic, financial, and employment opportunities.
 - **Benefits cliff effect ++:** Families with benefits like Section 8 voucher, affordable health care, food stamps, and daycare subsidies often have to make difficult tradeoffs between increasing their work and income or risk completely losing benefits. Supplemental Security Income (SSI) holders, for example, need to stay under a certain income amount to maintain their benefits. Many calculate that it is not worth a small salary increase to lose access to their services and safety nets.
 - **There is misinformation that increasing your income** can jeopardize your ability to keep your public housing, which is not true in NYCHA developments.
 - **Long-term planning** is difficult for some NYCHA residents since they are often dealing with immediate needs or are in crisis mode.
 - **Areas with higher living costs** like groceries can make it challenging for low-income groups, such as NYCHA residents, in high-cost areas to save.

- **NYCHA residents face stigma and discrimination from employers** who often have low expectations of residents.
- **Historic isolation can present a barrier for residents to leave their communities.** Young adults are often limited by parents that prefer to keep their children working nearby, instead of pushing them to pursue job opportunities in other areas. This is often due to fear of violence or risking safety, or fear of leaving a known community and comfort zone due to historic isolation.
- **Concentrated culture of generational poverty:** NYCHA residents do not always have exposure to role models or networks in their community that support economic advancement. On the flipside, participants shared how NYCHA's REES program has provided training opportunities and career paths that they would not have accessed otherwise.
- **Justice involved / formerly incarcerated**
 - **Re-entry populations often come from segregated, low-income areas**, which can create economic burdens, as well as challenges for them in accessing employment and economic opportunities.
 - **Face difficulty in accessing both housing and employment.** "Ban the Box" to remove criminal history from job applications and limits on drug testing are good but might be difficult for small businesses to interpret and follow these rules.
- **Homeless households**
 - **Unstable housing ++** can lead to challenges maintaining a job. One in three families that first enter a shelter has a job. When in the shelter system, you have limited control over where you are placed and this can increase your commute time or make it hard to maintain consistent employment.
 - **Voucher holders in shelter** encounter source of income discrimination, which makes it difficult to hold employment while still in shelter.
- **Seniors**
 - **Retiring is not always an option.** Seniors often do not have assets on which to fall back.
- **Immigrants**
 - **Often have underutilized skills**, like advanced degrees from their country of origin.
 - **More likely to have rights violated in the workplace.** Undocumented immigrants often do not report work related abuses.
 - **Face high cost and fees for remittances sent back home**, which means that immigrants have less disposable income.
 - **Lack of documentation** forces immigrants to the underground economy for employment.
- **Individuals with mental illness:**
 - **Not enough support for those suffering from depression**, which often comes from systematic oppression. It can be difficult to find a job and interview when suffering from mental health issues.

III. Identifying Future Trends

Participants noted the following future trends may further impact disparities in access to employment and economic opportunities:

- **HUD's changing mandate:** Trend of disinvesting in public housing from HUD, which puts families at risk of having stable living environments needed to secure stable jobs. Also, HUD's proposal to increase proportion of rent to income to 35%, further reducing already low disposable income for low-income families.
- **Deteriorating infrastructure:** Aging infrastructure and growth in population means increased commute times to work.
- **Growing net income disparities** are increased by rising housing costs. Organizations like the National Housing Coalition have looked at the wages needed in order to afford a standard market

rate apartment in New York City. Someone would have to make \$30/hour in order to afford a basic one-bedroom apartment.

- **New jobs are requiring higher educational attainment levels**, skills, and work history.
- **Student debt crisis:** Average students are graduating school with debt due to the increasing tuition cost and stagnant wages. Sometimes students are not able to graduate because of the debt.
- **Degrading of consumer protection laws**, which will impact people's financial lives.
- **Technology will continue to shift the job market.** People are competing with automation, and virtual stores are competing with brick and mortar stores. There is also a shift in employers requiring smart phones. Workers need to borrow money to get a phone with expensive data plans.
- **Blue collar jobs are moving to other cities.** These used to be stepping-stone jobs to certain good paying industries.
- **Jobs are being outsourced or changed to contracting types**, where there is a lack of stability and upward mobility.

Understanding and Prioritizing Contributing Factors

Below is a summary of what participants discussed regarding each of the contributing factors driving disparities in accessing employment and economic opportunity. The contributing factors below are listed in order of how participants prioritized them across break-out tables, from highest to lowest number of individual votes.

Loss of affordable housing (14 votes)

- **Gentrification and limited preservation of existing affordable housing ++**, which is especially true in high opportunity areas. This more heavily impacts the under- and unemployed, and increases the likelihood of rent burden, homelessness, doubling up, or displacement into areas with worse housing conditions, schools, childcare access, and longer commutes to work. This is more likely to affect people of color, families with children, and people with disabilities.
- **Housing instability and frequency of moves** due to lack of tenant rights to lease renewals adds to a household's costs, instability for kids, and can impact job security.
- **Displacement and neighborhood change** can disrupt community networks and social capital, which have historically helped people overcome poverty.
- **Predatory practices and rising taxes** put low-income homeowners at risk of losing homes and in a position where they are less able to pass down wealth to younger generations.

Lack of public/private investment in specific neighborhoods (11 votes)

- **Lack of investment to improve schools, transit, and health ++**, which contribute to a resident's ability to access employment, perform well on the job, and save money.
- **Child care access**, affordability, hours of operation, and locations near home or work can impact women's labor force participation, commute, job security, and access to certain industries.
- **Deteriorating living conditions in some affordable housing units** can lead to health issues, high healthcare costs, and lost wages.
- **Residents' need to travel to access better amenities outside of their neighborhood**, such as parks, retail, jobs, or services, leads to time and income lost. Having these resources locally neighborhood can mean more time for family, opportunities for self-care like exercise, and financial savings.
- **Lack of private reinvestment for public resources ++:** Private companies receive tax breaks but there are limited requirements to reinvest in the communities that need it most and provide public goods to help low-income residents overcome poverty.
- **Lack of investments to improve the safety of neighborhoods and provide youth with activities can also impact economic opportunity.** In low-income areas, including NYCHA campuses, for example, community violence can be a barrier, preventing people from taking advantage of training or

job opportunities in certain areas or to leave their campuses due to invisible gang lines. NYCHA staff often face difficulty finding neutral grounds to host training opportunities open to multiple developments.

- **Private and public investment coming in is often tied to the tradeoff of increased density.** A lot of previously neglected neighborhoods are now getting an infusion of investment that does not always feel accessible or for long-time residents.
- **Resources provided in public housing** often lack academic advising or access to technology, which can prevent upward mobility for those living in public housing.

Lack of job training programs (9 votes)

- **Agency coordination to connect residents to new opportunities ++:** There are many local training programs, but limited results and a lack of coordination between agencies and employers to prepare people for the future labor supply. There is a gap between entities that are tasked with bringing decent jobs and growing economies (EDC), and those that directly serve low-income neighborhoods (HRA). The disconnect plays out in projects like Industry City, where the new investment is not connecting longtime residents to new jobs brought by the investments.
- **Publicly-supported job training is often limited to low-wage jobs ++:** For example, the Back to Work Program by HRA offers limited, low-wage options like store clerk and security guard. Workforce1 by SBS has slightly better employers with higher paying jobs, but jobs are often without career pathways. Trainings do not often align with employer needs.
- **Internal training opportunities are no longer offered ++:** by corporations for career development. Some basic skills can be obtained by training, but for someone in poverty it can be difficult to have the time or money to get this training outside of work. Because of the skills gap, companies often bring in workers from out of town with higher educational attainment.
- **Training programs** for NYCHA are often limited to certain age groups, and are not available for young adults over 24 that could benefit from these trainings.
- **Lack of paid training programs:** People are not able to afford a full time training program for 3-6 months without pay. It can jeopardize the ability to afford their home. Often these opportunities provide low salaries, which are not enough to alleviate poverty. There is also lack of thoughtful incentives such as travel stipends for participants in training, and critical services like childcare vouchers are not always available to someone seeking training.
- **Lack of financial literacy along with job training:** Often, participants need support with how to save and prepare for new income and how their benefits might change.

Private discrimination (9 votes)

- **Employment discrimination ++:** It is not easy to track when people are turned down from a job due to protected class status.
- **Some employers and groups that provide training opportunities often stigmatize NYCHA residents.** They have low expectations of them, avoid hiring them, and often do not accept resident's applications for training programs or employment. REES staff often needs to advocate for NYCHA residents so that employers and partners bring opportunities to residents.
- **There is education-source bias:** For example, companies do not recruit CUNY graduates.
- **Landlords are not accepting vouchers,** which prevents families in shelters from accessing stable housing to support a stable job. There is also a lack of enforcement and education for landlords to their obligation to the law and how to navigate vouchers. Voucher holders do not have the ability to demand landlords comply with anti-discrimination laws.
- **Homebuyers of color may be steered to certain neighborhoods,** where they may not be able to benefit from the same increases in value in their home.
- **Co-ops boards discriminate** in different ways, preventing families and people with disabilities from living in areas of opportunity.

Availability, type, frequency, and reliability of public transportation (8 votes)

- **Transportation cost ++** can be a barrier to employment. There is a lack of affordability for school children and low-income people, who pay more for transit costs because they are not able to afford the higher upfront cost for longer term transit passes. This can also impact access to suburban areas of opportunity.
- **Infrequent transit and deteriorating infrastructure impact commute times ++.** These also can cause delays, which will most likely affect those with longer commute times.
- **Lack of city-wide accessible systems:** Many of the stations and much of the infrastructure in NYC are not accessible, especially in areas with the highest amount of people with disabilities, like the Bronx. The lack of accessibility affects how people get to jobs and school.
- **Lack of transportation hubs where low-income people are located.** Low-cost housing is often located in places serviced by buses, which can be less reliable than trains.
- **Many low-income people have multiple transfers** on their journey, which can impact missed connections, make them late for work, and can lead to job loss.
- **Safety conditions of public transit also impacts employment.** People may feel unsafe passing through certain areas to get to jobs.

Lack of access to opportunity due to high housing cost (8 votes)

- **Rent burden for families ++,** takes away from paying for childcare, saving, and training and educational opportunities, making it challenging to advance professionally. This contributes to the lack of resiliency to withstand financial shocks. Families make hard tradeoffs between losing their home and paying for other needs.
- **High housing costs in the private market make it challenging for public housing residents to pursue economic mobility.** NYCHA provides flexibility and security when there's income fluctuation, which then reflects on their rent. At a private building, their rents will continue increasing regardless of potential unexpected income changes.

Location and type of affordable housing (5 votes)

- **Lack of affordable homeownership opportunities ++:** Homeownership can be a piece of breaking the intergenerational cycle of poverty, but affordable homeownership is not being promoted by the City. Pre-purchase classes are graduating qualified homebuyers, but there is no supply affordable to them.
- **Location of affordable housing in high poverty areas can reinforce limitations in social capital ++:** Areas of concentrated poverty often do not have the exposure of parents and communities with high educational attainment, knowledge of career paths, and direct connections to doctors, lawyers, college graduates, that can provide social capital (networks and relationships) with institutions and employment opportunities.
- **Lack of proactive policies to ensure low-income people are able to live in transportation hubs:** Some affordable housing is located in transit deserts and away from major job hubs, isolating people from opportunities (for example, Rockaways or Spring Creek). Once a family finds a rent stabilized apartment or gets into public housing, they tend to stay there for the rest of their lives. Fixed apartment locations shape where and how you look for a job.

Impediments to mobility to integrated and/or high opportunity areas (4 votes)

- **Payment of voucher is lower than what owners will allow,** limiting voucher holders from accessing economic opportunities available in high opportunity areas.
- **Rent vouchers do not incentivize economic mobility.** You might be less likely to go back to work or move into a higher paying job for fear of losing your voucher and all other associated benefits.
- **Affordability standard (to pay 30-35% of income) is not realistic for low income families,** who have less disposable income left over to spend on other goods, contribute to savings, and build wealth. Requirement used to be 20% of income.
- **Lack of additional support for voucher-holders,** including childcare and transportation, prevents low-income families from having enough net income to contribute to savings.

Lack of local or regional cooperation (4 votes)

- **Lack of coordination between agencies** to connect local residents to new economic opportunities spurred by public investments. Not enough thoughtful or forward thinking investment in workforce training to connect residents to new economic opportunities.
- **Public housing admissions policies and fair housing rights need to be revisited for justice-involved groups.** Disproportionate numbers of people of color are being incarcerated and this impacts access to housing in the region, and thus stability in order to obtain jobs and rebuild economically.
- **Lack of prioritization of housing for people with disabilities** and ensuring accessible housing is serving people with disabilities who need them in the region. Lack of accessible housing functions as discrimination, even if it was not intended that way.
- **Lack of multifamily homes and shelters in high opportunity suburbs** of New York, including outer boroughs like Staten Island and Queens. This is connected with land use and zoning and community opposition.

Lending discrimination (4 votes)

- **Lending discrimination limits where people can live** and has determined the racial makeup of neighborhoods, further limiting the economic opportunities of communities of color.
- **Community Reinvestment Act incentivizes investment in low-income neighborhoods, but not necessarily the low-income residents in the area.** The idea was to incentivize investment in low-income neighborhoods, but now banks are using this to lend to White families in gentrified neighborhoods who come with good credit, not necessarily benefiting low-income residents.
- **Protected classes are more likely to be denied funding or get worse loan terms,** which take away financial resources from a household, including funding for repairs, education, entrepreneurship, and emergency funding.
- **Denial to loans and financial tools based on credit scores,** which is often correlated with protected class status, creates disparate impacts.

Land use and zoning laws (4 votes)

- **City policies tend to favor “highest and best use” for zoning,** which often ends up prioritizing housing and commercial uses. Industrial uses can create better-paying jobs and have lower barriers to entry.
- **Inclusionary incentives in new development, with small-set asides,** are not enough to ask of developers to ensure real access to economic opportunity areas for low-income families.
- **Siting policies and review processes** for homeless shelters and other “unwanted” uses welcome community opposition, leading to successful blockages from high income areas, and their concentration in low-income neighborhoods.

Location of employers (4 votes)

- **Shifting job centers ++:** Loss of manufacturing jobs in outer boroughs impacts available jobs in these areas. This also increases transportation cost for those living far from new job hubs, often low-income families.
- **The location of an employer does not guarantee an accessible job ++.** Employment access is often not only determined by physical closeness, but is instead often more related to networks and education.
- **Lack of local hiring requirements** for big companies that come into low-income neighborhoods of color. Employers often come into neighborhoods making promises to hire local and fail to find “qualified” candidates.

Limited access to financial services (3 votes)

- **Few financial institutions are accessible to protected classes ++:** New York has a high rate of underbanked or unbanked households. These households then depend on predatory sources of financing. Banks often have ID requirements, offer services only in English, have minimum balances or

high fees, and inconvenient hours. Check cashing and pawn shops are often vilified, but they fill the void banks leave in lower income neighborhoods.

- **Lack of credit history and education around credit scores ++** are challenges for New Yorkers to get housing in the private market and getting loans to open a business, buy a home, finance higher education, and build wealth. Residents are often not aware of their credit history or credit report. A low credit score can mean a higher rate/fee when seeking a loan or credit card, which can contribute to higher debt accumulation.
- **Cost of financial services:** Low-income individuals pay more for financial services and have worse banking terms. They tend to have higher interest rates, more overdraft fees, and accounts frozen, impacting their overall ability to save.

Other: Policing and Criminal Justice System (2 votes)

- **People are excluded from jobs because of criminal justice history**, which becomes a self-perpetuating cycle. There are some neighborhoods that are more heavily policed, and then residents there have more barriers to employment. *Related to discrimination.*

Community opposition (1 vote)

- **NIMBYism to shelters and affordable housing ++** blocks low-income families from accessing higher opportunity areas. A council member who represents the interest of white constituents might reject shelters or affordable housing developments in their area. As a result, these developments then end up in lower income communities, where there's less power for opposition and more disinvestment.
- **There is opposition in low-income communities** around new businesses, growth, and developments due to the feeling that these investments are not for them and will eventually cause displacement. Lack of benefits like real, enforceable, local hiring requirements.

Other: Lack of access to well-paying jobs (1 vote)

- **Lack of well-paying jobs with career pathways that have low barriers to entry.** Jobs brought in by malls and the gig economy pay low wages and target low-income workers. Most well-paying jobs need a bachelor's degree even if the job is skills-based. Lack of career pathways leads to instability and further challenges of low-wage workers to access transit, childcare, food security, and other means necessary to thrive economically.
- **Civil service jobs** are a great path to middle class work, but access to civil service exams is difficult.

Occupancy codes and restrictions (1 vote)

- **Restrictions on accessory units** may prevent homeowners from gaining a critical source of income to maintain and keep their homes.

Systemic impacts of all contributing factors (1 vote)

- Stagnant wages, relative to high costs and lack of universal access to affordable housing, childcare, higher education, healthy foods, and health care, including travel time to access these resources, are directly connected to employment disparities and limited economic mobility.

Occupancy Policies and Procedures in Publicly Supported Housing¹

- **NYCHA rent increase structure:** Residents are often misinformed on the gradual rent increase policy in NYCHA if your income goes up. Some residents forgo higher paying job opportunities in fear of having their rent increase, particularly in case of potential future job instability.
- **Residents fear the HUD-proposed rent-to-income ratio increase to 35%**, as 30% of gross income is already a heavy burden on extremely low-income residents.
- **Lack of enforcement of occupancy policies that incentivize residents to seek economic opportunities.** HUD has a mandate that residents that are not working or going to school must

¹ This contributing factor was created from a mini-roundtable discussion held with staff from the Office of Resident Economic Empowerment and Sustainability at NYCHA. Because there was no prioritizing activity in, this contributing factor does not have a number of votes associated with it.

participate in community service, which is meant to expose residents to opportunities outside of the NYCHA development. However, this policy is not enforced – there are no incentives or consequences.

Where We Live NYC

Topic-Based Roundtable F: Transportation

Qualitative Data Synthesis

This document summarizes the feedback we heard from stakeholders at the Transportation Learn Phase Roundtable that took place on July 25, 2018.

(++) indicates that this idea was discussed at multiple tables

Key Takeaways

- Participants stressed the interconnectivity between housing, transit access, and land value that reinforces differences in access to transit opportunities. High-income earners have the shortest commutes (and thus lower transportation costs), while low-income earners have longer commute times (and thus higher costs). Because of land cost dynamics, affordable housing is sometimes built areas far from job centers or with limited transit options.
- Participants felt that the metrics used for transportation investments can skew towards areas already well served because of the density and number of users, and divert funding from areas with poor transit access and higher investment needs (disproportionately low-income communities of color). This creates a widening divide in transit quality based on where people can live.
- Participants wanted to see more data and analysis of non-work trips, trips with multiple stops or multiple modes, and wait times, all which can impact cost. Participants also wanted to see more data quantifying the challenges people with disabilities face in transit, including differences in transit coverage and how transit planning looked if quarter mile walksheds were considered, instead of the traditional half mile.
- Overall, here are top six contributing factors to disparities in access to reliable and affordable transportation that participants identified:
 - **Availability, type, frequency, and reliability of public transportation:** There lacks an equity lens in prioritizing investments. Buses are often unreliable (due to traffic conditions, blocking of bus lanes, and reduced frequency) and bus stops lack amenities like shade, lighting, and benches that can be critical for people with disabilities and seniors. Multi-modal connectivity and late night transit can also be challenging, impacting most those that live in the fringes or have non-traditional/multiple jobs.
 - **Loss of affordable housing** in transit rich areas is driving low-income residents into areas with worse transit access, forcing higher transit costs through commute time or vehicle ownership reliance.
 - **Lack of access to opportunity due to high housing costs:** Areas that have good transit access are unaffordable for low-income families, limiting their options to areas that are affordable largely because of poor transit (like inner ring suburbs). This is connected with loss of affordable housing and limitations in voucher subsidies to move into transit-rich areas.
 - **Lack of local or regional cooperation** means the City has limited power to make comprehensive improvements to the whole transit system, which continues to affect the reliability of local transit. Meanwhile, more dollars per rider is spent on larger regional commuter projects that serve suburban residents (mostly White), rather than investing in projects that expand services within the city, particularly for outer boroughs where there are low-income communities of color with high transit needs.
 - **Accessibility of Transportation:** There is limited equitable distribution of capital dollars to create (and maintain) more accessible cars, platforms, and stops/stations, especially in outer boroughs where there are concentrations of people with disabilities. Transit wayfinding currently lacks complimentary visual, auditory, multi-lingual, and multi-sensory forms of communication. There is a lack of affordable and reliable door-to-door accessible transportation options, as well as enforcement of American with Disability Act (ADA) rules for

private transit. Bike and car share programs currently do not provide options for customers with disabilities.

- **Land use and zoning laws:** There are still many well serviced areas with good transit but low-density zoning, limiting potential for higher density and multifamily affordability. On the other hand, while transit-oriented development makes sense, there are fears that transit improvements can make it hard for low-income families to be able to stay living in the area if rents go up.

Existing Conditions

I. Analyzing Data on Residency Patterns and Differences in Access to Transportation:

We heard the following from participants in response to how the initial data presented in the session reflects their understanding of disparities in access to quality and reliable transportation:

- **Inequitable access to transit-rich areas ++:** People in higher paid sectors live in transit-rich areas with shorter, lower-cost commutes, while lower paid workers, often people of color and immigrants, often live in areas far from the city core or with limited public transit options, have greater difficulty paying the cost of a monthly MetroCard, and have longer and more costly commutes (due to loss in work time). There is a lack of research on disparities in travel cost.
- **Non-work trips and trip-chaining (multiple destinations) are important to capture ++:** Only 20% of commute trips are to work. Many New Yorkers make multiple stops, like dropping off children to childcare before or after work. Low-income families living in gentrifying neighborhoods may travel farther to find affordable food or grocery stores that cater to their needs.
- **Private shared transit fills in the gaps in speed, but carries higher costs ++.** Dollar vans are used where there is unreliable service. They follow similar routes as buses, but are able to get to places faster. People will pay extra to get to places faster (an additional \$2 on top of MTA trip, and transfers are not free). However, the use of these vans as well as Uber, Lyft, and other private transit, also add traffic to streets, which can impact public bus reliability.
- **Long commutes affect economic and health opportunities ++.** It impacts time spent with children or can disincentivize additional training or educational opportunities. Long commutes can also impact mental health, increase stress, and decrease social time.
- **Need to look at disparities in access beyond the half-mile walkshed to rapid transit and explore quarter-mile access.** Half-mile walks are challenging for seniors, families with strollers, or people with disabilities.
- **Lack of data on paratransit unreliability.** Need data that captures wait times and its associated costs. People with disabilities often wait hours for an Access-A-Ride.
- **Lack of data on usage of Citi Bike, Uber, and Lyft** and concerns that data from these groups is not being shared with the City.
- **Shifting job hubs and challenges in inter-borough travel.** Transportation has been designed to take people into Manhattan, but job growth is also happening in Brooklyn and other parts of the city. Many healthcare workers, for example, live in the outer boroughs and face longer commute times to get to work.
- **Individuals jump turnstiles** due to inability to pay for a MetroCard and risk arrest and incarceration for repeat offenses or outstanding warrants. There are disparities in policing against people of color.
- **Atlantic Ticket Pilot Program** is not open to Rockaway residents, limiting the local benefit.

Participants suggest the City reference the following additional studies, data sources, or analysis:

- Unhealthy Commute – Center for Urban Future
- Access to Jobs Map in Regional Plan Association’s Fourth Regional Plan
- Transportation Equity Atlas – Pratt Center
- Image NYC – NY Academy of Medicine
- Pushed Out – Regional Plan Association
- DCP looked at transit utilization in rezoned neighborhoods

- Cornell has data on the intersection of jobs and disability
- Access-A-Ride analysis by NYU Rudin Center
- City Los Angeles report on how rapid transit harms affordability and has unintended consequences
- Access Denied Report – TransitCenter
- Taxi and paratransit materials by United Spinal and other legal entities litigating on behalf of disability groups
- When Goods Movement Matters – Regional Plan Association

II. Analyzing Unique Challenges Faced by Focus Populations

Participants noted the following unique needs or challenges faced by specific populations:

Seniors:

- Sometimes need pause and rest between stops. City benches and shade are important to aiding seniors while they travel.
- Seniors are only 12% of population but 50% of pedestrian fatalities. Lack of islands and crosswalks can affect the travel experience of seniors.

People with Disabilities:

- Often limited to Access-A-Ride, which has many issues with reliability and prevents flexibility of rides since it needs to be scheduled the previous day.
- People with sensory disabilities often need clear and diversified wayfinding. The overall system is confusing relative to other cities, signs are not always legible, fonts on maps are tiny, and announcements are difficult to hear.
- People with Intellectual or Developmental Disabilities living in supportive housing in areas that require multiple transit modes to get to essential services can really suffer because of their learning needs.

Immigrants:

- Those with limited English proficiency face difficulty. Access-A-Ride is only in English, though there is a new settlement in place requiring certain aspects be available in other languages. Immigrants with limited English proficiency often have difficulty reading signs or catching announcements, causing them to miss stops.

III. Identifying Future Trends

Participants noted the following future trends may further impact disparities in access to quality and reliable transportation:

- **Growing aging population** who need paratransit services, which are currently unreliable.
- **Home delivery services ++** are increasing the amount of trucks in neighborhoods, which create congestion, health, and safety issues. There has been a 20% increase in growth for Amazon deliveries. Forty percent of New Yorkers receive multiple deliveries a week causing congestion and increased commute times.
- **Climate change:** In Rockaways, all surface-level transit is vulnerable to weather and not just extreme weather events.
- **Vehicle ownership is** increasing, increasing traffic and NIMBYism against projects that impact parking. Vehicle registrations have increased, though fewer teenagers are learning to drive.

Understanding and Prioritizing Contributing Factors

Below is a summary of what participants discussed regarding each of the contributing factors driving disparities in accessing quality and reliable transportation. The contributing factors below are listed in order of how participants prioritized them across break-out tables, from highest to lowest number of individual votes.

Availability, type, frequency, and reliability of public transportation (12 votes)

- **Lack of comprehensive systems-wide investment in public transportation**, all the way to the federal level. Ridership is significantly higher than decades ago as the city grows, but the system faces a lack of investment to meet the demand (like expanding train lines). This leads to delays, signal problems, and deteriorating infrastructure.
- **Focus on improvements in areas with highest ridership** results in the cutting of services in outer boroughs (including turning buses around and removing frequency at the edges), where more reliable transit is actually needed to incentivize ridership. People rely on cars more and more because the public transit system is not as reliable. There has been a larger focus on Midtown improvements instead of cross-town and inter-borough connectivity (lack of equity lens). Inter-borough trips are particularly challenging, forcing multiple transfers.
- **Street conditions and space allocation impact bus commute time and ridership**. There are many issues with bus reliability, including delays related to traffic, lack of dedicated lanes, and enforcement of violations that impact delays and ridership. Bus lanes are sometimes painted and supposedly camera-enforced, but continue to be blocked (including by City vehicles). There are no barriers separating bus lanes to ensure a dedicated, direct route.
- **Limited policies to reduce driving, traffic, and congestion**, which can could public transit reliability. There is also not enough research done on how disincentivizing driving might impact low-income communities of color in outer boroughs who are forced to rely on cars.
- **Lack of shade, lighting, transparent station sheds, and other health and safety design interventions ++** can be deterrents to people feeling safe and able to access transit. There are disparities in the quality of stations depending on neighborhood – this includes design, safety, policing, and cleanliness.
- **Limited frequency and multi-modal connectivity during late nights or early mornings make it challenging for off-hour workers** who are often low-income individuals. These individuals face longer commute times and stress, often risk their personal safety making transfers.
- **Challenges with multi-modal transit**. For example, it is challenging to take your bike onto buses or trains; lack of free connection from ferries; and limited line connectivity across different modes.

Loss of affordable housing (11 votes)

- **The market rate real estate industry has been targeting transit-rich neighborhoods for residential development**, raising property values and pricing out lower-income residents further out on the train lines, creating a domino effect.
- **Moving out in the fringes** to seek more affordable housing options often also means higher costs of transportation (heavier reliance on cars, more time spent on commuting, multiple modes, etc.).

Lack of access to opportunity due to high housing cost (10 votes)

- **Transit access drives affordability**: Areas that have good transit access are unaffordable and inaccessible for low-income families (connected with loss of affordable housing). Meanwhile, areas with new and existing affordable housing are often in areas with poor transit access.
- **As more affluent people move out of suburbs and into transit-rich areas in the city**, communities of color have been doubling up and moving into inner-ring suburbs (which have become naturally occurring affordable housing) with poor transit access.

Lack of local or regional cooperation (8 votes)

- **Lack of cooperation between City and State on equitable, comprehensive transportation planning.** There is limited conversation between federal, state, and local transit agencies, and with community organizations to understand the issues. The City has limited ability to step in and make transportation improvements (City controls streets, ferry, BQX). Better coordination with the State is needed to ensure thoughtful connectivity (like free connection to MTA) and systems efficiency.
- **Lack of equity lens in prioritizing investments.** White affluent areas get significantly more investment. City fights for crumbs because so much money goes to larger regional commuter projects that cut commutes for suburban residents rather than investing in projects that expand services within the city for the outer boroughs with low-income residents that need it the most, like investing in buses. Politics of suburb versus city are at play.
- **The State Human Rights Law does not have source of income discrimination protections,** isolating protections to New York City and making voucher portability to high-opportunity suburbs challenging.

Accessibility of transportation (7 votes)

- **Lack of equitable distribution of capital dollars to create more accessible stations.** More than half of stations are not ADA accessible, and the frequency of accessible stations is worse in outer boroughs. Disparate access to accessible stations impacts communities of color more, who live in the outer borough areas, and often in areas where there are concentrations of affordable housing, supportive housing, senior housing, etc., that need accessible infrastructure most and may have less access to affordable alternative options. This can lead to isolation for these communities.
- **Transit wayfinding currently lacks complimentary visual, auditory, and multi-sensory forms of communication.** Lack of large-font text, audible and visual announcements, multi-lingual signage and announcements, contributes to inaccessibility. Loud noises in the train and station also make it challenging for people with difficulty hearing.
- **Platform and train car design present difficulties for those in wheelchairs or with strollers.** There are often large gaps between platform and cars (horizontal and vertical), and the interior layout of cars (where poles are located) make it challenging to turn, get in, and get out. There also lacks education around etiquette to encourage support for customers with special needs.
- **Stations that are accessible sometimes have broken elevators.** Those who might be getting to station via Access-A-Ride then become stuck.
- **Lack of training and enforcement of ADA rules.** ADA requires transportation with more than eight passengers to be accessible (dollar vans apply), but the majority are not.
- **Lack of affordable and reliable door-to-door transportation services.** Access-A-Ride has poor reliability. By 2020, 50% of taxis should be accessible, but the number of taxis is diminishing due to the growth of ridesharing, such as Uber or Lyft, which are not accessible.
- **Poor street conditions and supportive design:** Poor sidewalk conditions make it difficult for people with disabilities to get to a bus stop. Many bus stations lack sheds, lighting, and benches, which are important for the experience of seniors and people with disabilities.
- **Bike and car-share systems** do not have machine or vehicle options for people with disabilities. Car share parking spaces are accessible, but vehicles are not.

Land use and zoning laws (5 votes)

- **Many areas with great transit have density restrictions ++.** Downzoning in affluent neighborhoods during the Bloomberg administration occurred along transit lines where white affluent people lived (like the E and F lines in Queens), limiting potential for transit-oriented development and access to these high opportunity areas. Loosening some occupancy and density restrictions in these areas can bring a greater influx of housing here.
- **Upzonings near transit hubs increase density and land values ++.** While this makes sense to increase density and do transit-oriented development, it can make it hard for low-income families to stay, and may lead to displacement into areas with worse transit.

Location and type of affordable housing (3 votes)

- **Historic locations of public housing ++** like Red Hook, parts of the Bronx, and Rockaways are on the fringes of the City with poor transit access, which limits opportunity.
- **Due to land cost and limited public land availability, some new affordable housing is being built in areas with limited transit options ++** and is being built without improvements in transportation access. The Spring Creek development in East New York is one mile away from the closest subway station (New Lots Avenue), with limited bus service.
- **Supportive housing** is not planned with transportation in mind, impacting those with physical or developmental disabilities.

Community opposition (3 votes)

- **Affluent populations oppose select bus service investments through their neighborhood ++**, citing that their community has no need for these services, but the beneficiaries of improved service need to pass through their communities (e.g., Woodside). Car communities in the fringes of the city were historically designed in order to keep out people of color. These communities that are resisting public transit expansions like new bus routes are repeating historic motivations.
- **Often, the loudest voices are the ones that have the time and power** to be able to attend meetings, oppose transportation access, or advocate for responsiveness to their needs. Low income individuals that rely on the systems like buses may have less time to devote to advocacy efforts. Participants also noted that MTA responded differently to advocacy in the Rockaways about a closure there, compared to their response to advocacy regarding the L train closure.
- **There lacks coordination and strategy in communicating multiple transit improvements** in a neighborhood, which can frustrate communities and fuel opposition. There is often misinformation about the implementation of bike lanes that gets caught up with other types of transportation challenges. (e.g., issues around the 7 line and overcrowded buses).

Private discrimination (3 votes)

- **Source of income discrimination** makes it challenging for families to access good transit areas. The State does not have source of income discrimination protections and one third of state residents live in areas without voucher discrimination protections.
- **NYC Commission on Human Rights** is not doing enough proactive public outreach and advocating for residents to their landlords. Residents are forced to bring up cases on their own behalf, and often avoid it in fear of retaliation.

Lack of public/private investment in specific neighborhoods (3 votes)

- **Lack of incorporation of equity principles in investments ++**. White affluent areas are getting more transportation investment compared to low-income communities of color. Not enough select bus services in outer-borough areas.
- **Metrics used for transportation investments** are skewed towards areas already well served because of the number of users and the density, but this creates a widening divide between transit quality and experience base on where people live.

Impediments to mobility to integrated and/or high opportunity areas (1 vote)

- **Voucher steering by agencies:** Anecdotally, agencies have told residents that certain landlords are voucher landlords, thus steering voucher holders into certain neighborhoods – often areas with poor transit access.
- **Limited voucher subsidies.** LINC voucher holders can only afford a room in areas with terrible transit, for example Southeast Queens.

Inaccessible Housing Stock (1 vote)

- **There's a lack of both accessible private housing and public housing** (lack of ramps, proper turning radius, etc.) that limits the areas where people with disabilities can live. Accessible apartments are often located on outer edges of the city, where transit access is worse.

contributing factor 1: Siting and type of affordable and accessible housing in NYC and the region

Issue 1a

Challenges with financing and developing low-income housing in high-cost areas

Stakeholders noted that creating regulated affordable housing units, especially those that are deeply affordable, is particularly challenging in higher-cost neighborhoods. Purchasing land for affordable housing in these areas is prohibitively expensive and high market rents make subsidy programs seem less valuable.

Example existing policies & programs:

- Tax incentives, tax credits, and other local, state and federal subsidies
- Inclusionary zoning programs and other zoning bonuses
- Policies and other factors that drive construction costs
- Public and/or discretionary review processes
- Site acquisition funding

Issue 1b

Barriers to the development of new multi-family housing in high-amenity areas

Stakeholders said that lower-density zoning, historic landmark districts, and opposition to changes that might trigger density and demographic changes in neighborhoods with high-performing schools and healthy environments—particularly at the edges of the outer boroughs and in the city’s adjacent suburbs—limits realistic options for the construction of multi-family housing, especially affordable housing.

Example existing policies & programs:

- Existing zoning and opposition to zoning changes
- Public and/or discretionary review processes
- Historic landmark districts
- Coordination of planning efforts with suburbs

Issue 1c

Deep affordability in high-poverty areas

Stakeholders said that there is a need for deeper affordable housing in high-poverty areas to match local needs. But new deeply affordable housing in high-poverty areas may further concentrate low-income New Yorkers and special needs populations in these neighborhoods, which often already have overburdened schools, services, and infrastructure (e.g., schools and hospitals with high volume of constituents living in poverty).

Example existing policies & programs:

- Income requirements in financing programs
- Types of affordable housing (rental, supportive, homeownership or rental, construction or preservation)
- Community development initiatives paired with housing
- Infrastructure investments

Issue 1d

Mixed-income affordability in high-poverty areas

Stakeholders expressed concern that new affordable housing projects that include moderate- or middle-income rental units in high-poverty neighborhoods may spur gentrification and displacement.

Example existing policies & programs:

- Income requirements in financing programs
- Types of affordable housing (rental or homeownership, new construction or preservation)
- Construction costs
- Community development initiatives paired with housing
- Rent stabilization laws
- Local preferences

contributing factor 2: Disparities in public and private investments, services, and amenities across neighborhoods in NYC and the region

Issue 2a

Equity-based investments

Stakeholders noted a historic and, in some cases, ongoing failure to invest in housing quality, schools, environments, and physical infrastructure in neighborhoods of color, which has led to disparities in access to opportunity and overburdened social infrastructure. Simultaneously, many residents fear certain investments could increase property value and lead to displacement.

Relevant existing policies, programs, and practices :

- Capital planning processes
- Public and/or discretionary review processes
- Equity initiatives
- Site acquisition funding

Issue 2b

Limited financial services

Stakeholders said that neighborhoods of color are served by limited financial services, which impedes personal and community wealth-building. Additionally, stakeholders expressed concern that the Community Reinvestment Act is being used to gentrify neighborhoods historically populated by people of color, while not actually benefiting existing residents in need.

Relevant existing policies, programs, and practices:

- Financial empowerment initiatives
- Community Reinvestment Act

Issue 2c

Insufficient career pathway programs

Stakeholders said that some job training programs, which target communities of color that currently experience high unemployment, do not focus on the right skills and do not lead residents to meaningful, career pathways (e.g. stakeholders worried about long-term prospects for low-wage retail and security jobs). Residents also face challenges to participate in job training programs due to childcare, transportation costs, and income needs.

Relevant existing policies, programs, and practices:

- Job plans
- Targeted outreach requirements
- Job readiness programs
- Employment referral programs
- Workforce development and career pathways programs
- State and federal regulations around hiring
- Financial empowerment initiatives

contributing factor 2: Disparities in public and private investments, services, and amenities (continued)

Issue 2d

Policing and criminal justice

Stakeholders noted that disparities in policing and the criminal justice system disproportionately affect people of color and create long-term outcomes that affect their access to quality housing, employment, health and safety, and economic opportunity.

Relevant existing policies, programs, and practices:

- Collaborative and neighborhood policing
- Restorative justice approaches
- Youth development programs
- Employment programs
- Neighborhood activation for safety
- Policing alternatives

Issue 2e

Environmental justice

Stakeholders said that many neighborhoods of color—particularly ones that are high-poverty—are over-concentrated with waste transfer stations, bus depots, truck routes, shelters, jails, and climate vulnerability, while high-income or predominantly white communities have few or none.

Relevant existing policies, programs, and practices:

- Capital planning process
- Zoning and land use
- Environmental impact assessments
- Public and/or discretionary review processes
- Climate justice initiatives

Issue 2f

Indoor health hazards

Stakeholders said that people of color, particularly those who live in public housing, are overexposed to indoor hazards such as pests, mold, and lead paint, which can directly impact children’s learning abilities and residents’ physical and mental health.

Relevant existing policies, programs, and practices:

- Housing rehabilitation programs
- Tenant/Landlord outreach
- Health in Housing initiatives
- NYCHA Rental Assistance Demonstration
- NextGen NYCHA

contributing factor 3: Community opposition to housing and infrastructure investments to accommodate growth in NYC and the region

Issue 3a

Power imbalance across communities that have a voice in approving or disapproving local investments

Stakeholders expressed concern that public and discretionary review processes can amplify the voices of wealthier, White residents, who have the time, opportunity, and political power to facilitate opposition to increases in density, homeless shelters, and undesirable infrastructure necessary for the City's growth. Stakeholders noted that opposition to projects in higher income areas, often rooted in discrimination against specific groups, can lead to successful blocking of projects in these areas and consequently, the concentration of these uses in high-poverty neighborhoods and communities of color.

Example existing policies, programs, & practices:

- Public and/or discretionary review processes
- Capital planning process
- Fair share approaches
- Outreach and education on uses and city-wide needs; destigmatization

Issue 3b

Fear of investments in high-poverty neighborhoods, leading to opposition of individual projects

Stakeholders said that high-poverty communities perceive development and revitalization, including affordable housing and improvements to neighborhood amenities, as potential triggers of gentrification and eventual displacement. As a result, current residents may oppose a development project as serving new residents, but not existing residents.

Example existing policies, programs, & practices:

- Neighborhood planning and community participation
- Public and/or discretionary review processes
- Capital planning process
- Local preference policies
- Tenant protection and rent-stabilization policies

Issue 3c

Perceived piecemeal development, leading to local opposition of individual projects

Stakeholders said that perceived piecemeal development allows organized communities to argue that specific projects are out of context, without considering the city's overall needs. Stakeholders also noted that there are some existing city-wide plans, but communities lack information or have misinformation about them.

Example existing policies, programs, & practices:

- Public and/or discretionary review processes
- Neighborhood planning and community participation
- Existing zoning patterns
- City-wide plans and frameworks

Original HUD contributing factors: community opposition; location of environmental hazards

Related to: public review process in land use and zoning laws; private discrimination; public and private investments in certain neighborhoods

contributing factor 4: Challenges to using housing vouchers in NYC and the region, particularly in high-cost areas

Issue 4a

Rental allowance limits

Stakeholders said that housing vouchers do not provide sufficient rental assistance to provide tenants with realistic options to live in integrated, high-amenity neighborhoods.

Example existing policies, programs, and practices:

- Small Area FMRs
- City and State vouchers

Issue 4b

Barriers to landlords accepting vouchers

Despite New York City's ban on source of income discrimination, stakeholders said that landlords frequently reject tenants with housing vouchers for reasons including burdensome administrative requirements, communication barriers, and outright discrimination.

Example existing policies, programs, and practices:

- Outreach and education
- Language access support for landlords
- Administrative requirements and payment structure for landlords
- Human rights and fair housing laws

Issue 4c

Support and counseling on neighborhood choice

Stakeholders said that some staff at relevant agencies exclusively direct voucher holders to the same neighborhoods—which are predominantly communities of color—where they know landlords are more likely to accept vouchers. Stakeholders also said that families with children do not receive adequate counseling around decision-making on how to use vouchers to direct their children to high-performing schools, both across New York City and in suburban areas. Stakeholders also noted social challenges faced by households that move into predominantly White, high-cost areas, in addition to differences in policing, isolation from supportive networks and service providers, and inability to afford groceries and other goods.

Example existing policies, programs, and practices:

- Voucher administration and staff training
- Outreach and education
- Language access support for tenants
- Support and counseling programs
- Supplemental vouchers
- Supportive networks and service providers

Issue 4d

Language access barriers

Stakeholders identified barriers to receiving and using vouchers for certain racial and ethnic groups, including limited outreach, education, and support available for tenants and landlords with limited English proficiency.

Example existing policies, programs, and practices:

- Outreach and education
- Language access laws and resources for tenants and landlords

contributing factor 5: Loss of and displacement from housing that is affordable to low- and moderate-income New Yorkers

Issue 5a

Tenant Protections

Stakeholders said that historical changes to the rent stabilization laws have led to an increase in harassment, evictions, and deregulation, which contribute to the loss of neighborhood diversity. Stakeholders noted that families who have been forced to move have fewer housing choices and often end up living in lower quality housing, overcrowded units, and/or more segregated neighborhoods.

Example existing policies, programs, and practices:

- Rent Stabilization laws
- Tenant education and organizing
- Legal services for tenants
- Building-targeted anti-harassment programs

Issue 5b

Affordability Duration

Stakeholders expressed concern that time-limited regulatory agreements between the City and developers can lead regulated affordable housing to become unaffordable at the end of a contractual period. They also noted that buildings will likely lose affordability in the neighborhoods that are gentrifying or have strong markets, where affordability is needed to prevent permanent displacement, and new affordable housing is much less economically viable

Example existing policies, programs, and practices:

- Regulatory agreements
- Tax incentives and other subsidies
- Non-profit property owners

Issue 5c

High-demand housing market

Stakeholders said that a strong local and regional economy, which attracts more residents, tourists, and investments to NYC, has increased the demand for housing and has driven up the cost of living for renters.

Example existing policies, programs, and practices:

- Hotel and homeshare regulations
- Property taxes

contributing factor 6: Discrimination and the enforcement of fair housing laws

Issue 6a

Persistent discrimination

Stakeholders said that private discrimination in the housing industry in New York City can reinforce segregation, but it is challenging to capture. There are persistent forms of discrimination by brokers, realtors, lenders, co-op boards, and landlords rooted in stigmas against different groups or unwillingness to make accessibility accommodations. For example, protected class members are led to non-existent phone numbers or waiting lists, shown housing options of different quality or location, or provided higher loan rates. Stakeholders also noted that many victims are unlikely to file a report due to distrust of government and skepticism about the efficacy of a complaint.

Example existing policies, programs, and practices:

- Public/private outreach and education on fair housing
- Public/private testing and enforcement
- CCHR

Issue 6b

Gaps in fair housing protections

Stakeholders noted the lack of fair housing protections from discrimination based on justice-involved history, low or lack of credit history, source of income (at the state level), and other characteristics that produce disparate racial outcomes and perpetuate disproportionate housing needs for people of color.

Example existing policies, programs, and practices:

- NYC Human Rights Law
- NYS Human Rights Law
- U.S. Fair Housing Act

contributing factor 7: Admissions and occupancy restrictions in publicly-supported housing

Issue 7a

Availability of affordable, integrated living options for populations with special needs

Stakeholders reported that there is a lack of affordable, integrated, and fully accessible housing in a range of unit sizes for people with disabilities and/or those who need supportive services. Stakeholders also discussed limited set-asides for people with disabilities and that modified units often end up being filled by tenants who do not need the modifications. They also described that modified units are sometimes not truly accessible (e.g., challenges with wheelchair turning radius). Finally, stakeholders said that units for people with disabilities and seniors are usually studios or 1-BRs, which, combined with rules around relations between tenants, can prevent living with family or caretakers.

Example existing policies, programs, and practices:

- Rules governing family of special population tenants
- Federal/local set-aside requirements
- Financing programs and tax incentives
- Building Codes and Design Guidelines
- Marketing Guidelines

Issue 7b

Eligibility criteria that can limit economic mobility

Stakeholders noted that eligibility criteria of housing programs can limit economic mobility for populations that rely on public support for housing – including but not limited to people with disabilities, voucher holders, and NYCHA residents. Stakeholders said that these populations often have to make difficult tradeoffs between keeping their housing support and accessing economic opportunity (e.g., a new job or higher income). Stakeholders also noted that sometimes this is driven by misinformation about what happens to rents/payments after a change in income.

Example existing policies, programs, and practices:

- Voucher income limits
- Income restrictions in City- and State-subsidy programs and phasing structure
- Occupancy policies and rent policy education/outreach
- Financial empowerment

Issue 7c

Administrative barriers

Stakeholders said that burdensome administrative requirements create barriers for members of protected classes to accessing affordable housing. For example, requirements for notarized copies or other actions that require multiple trips and appointments can be challenging for people with disabilities, the elderly, or people with inflexible work schedules. Legal forms of ID can be challenging for institutionalized populations. Stakeholders also described a lack of language accessibility and clarity on eligibility for immigrants for public assistance programs.

Example existing policies, programs, and practices:

- Voucher administration practices and requirements
- Landlord education and outreach on rights and responsibilities
- IDNYC
- Housing Ambassadors
- Language access laws and resources
- Marketing Guidelines

Issue 7d

Barriers for justice-involved populations

Stakeholders expressed concern that there are significant barriers to living in publicly-supported housing for people who have been involved in the criminal justice system.

Example existing policies, programs, and practices:

- HUD guidance and U.S. law
- Marketing Guidelines
- Occupancy policies

contributing factor 8: the availability, type, accessibility, and reliability of public transportation

Issue 8a

Inequitable rapid transit access

Despite NYC and the region's extensive rapid transit network, stakeholders said that there remain large inequities in neighborhoods' access to reliable rapid transit to important job centers and services. Residents who live far from rapid transit face challenges with multi-modal transit and connectivity, as well as challenges in late-night and early-morning transit options with regard to safety and frequency. Lack of reliable transit in suburbs that have quality schools and environments can also force people to live in the city if you cannot afford a car. Stakeholders also said that the growing use of for-hire vehicles leads to congestion, which impacts the speed and reliability of buses, which predominantly serve people of color.

Relevant existing policies, programs, and practices:

- City, State, and Federal capital planning
- Bus Forward
- Fast Forward – Plan to Modernize NYCT

Issue 8b

Limited universal accessibility features

Stakeholders expressed concern that the limited accessibility of subway stations, including its elevators, platforms, and car designs, present difficulties for those with wheelchairs or strollers. These difficulties are particularly acute in outer borough areas where the concentration of people with disabilities is highest and travel distances to job centers and governmental offices are longest. Stakeholders also said that wayfinding in public transit is not friendly for those with visual, auditory, multi-lingual, and multi-sensory communication needs. Additionally, there are still many bus stops that are accessed by challenging sidewalks and that have poor shade, lighting, and no seating options.

Relevant existing policies, programs, and practices:

- Fast Forward – Plan to Modernize NYCT
- MTA Capital Plans
- Street benches, lighting, sidewalk improvements
- DOT Travel Survey: People with disabilities, low-income, and LEP populations

Issue 8c

Limited affordable and reliable accessible transit options

Stakeholders mentioned that there are limited affordable, reliable, accessible transportation options for the elderly and people with disabilities. Access-a-Ride can be unreliable, have long waiting times, and require booking far in advance. Additionally, for-hire vehicles, dollar vans, and car- and bike-share services are often not compliant with ADA-accessibility rules.

Relevant existing policies, programs, and practices:

- Paratransit dashboard
- E-Hail App pilot
- Taxi and Limousine Commission mandates
- Bikeshare services
- Carshare services

contributing factor 9: Location of proficient schools and school assignment policies

Issue 9a

School admissions and enrollment policies

Stakeholders said that New York City's complicated mix of elementary school residency preferences (i.e. school zones) and school-choice policies reinforce residential segregation.

Families with more financial resources—who are disproportionately white—can pay for housing in school zones with higher-performing schools. Families who live in school zones with lower performing schools face complicated decisions, and certain families—including immigrants and parents with limited English proficiency—may struggle to navigate the system. Additionally, as students age, middle- and high-school assignment policies that use test scores, grades, and attendance records also reinforce segregation within schools and disparities in access to opportunity. Stakeholders noted that there is a lack of willingness by some parents to have conversations about the racial impact of these policies.

Relevant existing policies, programs, and practices:

- School ratings (public and private)
- School re-zoning
- School admissions pilot programs
- School diversity plans

Issue 9b

Accessibility of school facilities and availability of programs

Stakeholders reported that schools that are fully accessible for children with physical disabilities are limited, as are those that offer special needs services to children with other disabilities. This in turn forces children with disabilities to attend schools that may not be near their homes. Limited building accessibility not only impacts students, but also parents and teachers with disabilities.

Relevant existing policies, programs, and practices:

- District 75
- School diversity plans
- School building modifications

Where We Live NYC

Fair Housing Stakeholder Group

Create Phase Roundtables Synthesis

About

This document summarizes the main ideas shared by the Fair Housing Stakeholder Group at the Create Phase Roundtables, held in November and December 2018, and supplemented by one-on-one meetings with stakeholders in January 2019. The roundtables covered the following topics: Segregation and Integration; Disproportionate Housing Needs; Education; Healthy and Safe Environments; Employment and Economic Opportunity; and Transportation. The four sections of this document include summaries of stakeholders' (1) visions of success, (2) feedback on new data visualizations of residential living patterns, (3) input on how to define neighborhood opportunity, and (4) recommended solutions, organized by contributing factors and their respective issues.

Stakeholders' Visions of Success

When asked what stakeholders envisioned as “success” in terms of segregation and integration in New York City, **participants had mixed opinions** about the relevance of having more racially/ethnically integrated neighborhoods, questioning who benefits and burdens, particularly in the context of gentrification, discrimination, and loss of culture. Nevertheless, participants **shared common aspirations of what the “long-run success” of affirmatively furthering fair housing** initiatives could look like:

- **Choice, power, and self-determination for historically excluded groups**, on where and how they can live and what happens in their neighborhood.
- **Equitable neighborhood amenities and investments that address historic disinvestment and provide access to opportunity:** Where people have what they need to fully access resources to overcome poverty, build wealth, and enable better lives for their children. “...mobility out of poverty should not mean having to leave your neighborhood.”
- **A stable home and community for all to thrive:** Where everyone, especially people of color, immigrants, trans- and gender non-conforming individuals, domestic violence survivors, people with disabilities, those undocumented, and other historically marginalized groups, can have safe, permanent affordable housing and feel rooted in a community, without struggling to make ends meet or fear displacement; reduced isolation, especially for public housing residents.
- **Truly accessible, affordable, and independent living options for people with disabilities in integrated settings**, beyond institutions; all future apartments, buildings, infrastructure, and services, to be accessible to different types of disabilities; opportunities for people to age in place. “Living in institutions is something I want to move away from. Everyone deserves to be integrated.”
- **Reduced racial disparities** in education, wealth, health, justice-involvement, and overall life outcomes that are driven by where people live; reduced disparities for people with disabilities and other protected classes.
- **Diverse and inclusive neighborhoods, free of discrimination:** An end to systemic, institutional, and interpersonal systemic racism, including NIMBYism; communities coming together to solve problems. “...power to be distributed more equitably... an increase in power in decision-making for those traditionally excluded.”

Analyzing Segregated and Integrated Living Patterns

This section summarizes discussion at the Roundtable on Segregation and Integration on stakeholders' response to new data visualizations of residential living patterns which illustrate segregated and integrated living patterns over time relative to the concentration of the White population in New York City, as well as racial composition in relation to high and low percentages of poverty. These maps can be found online at nyc.gov/wherewelive.

Overall, stakeholders felt that the new maps better illustrated the segregated and integrated living patterns across the city, but suggested the following to create a clearer narrative:

- **Label maps with neighborhoods** to make it easier to read and interpret.
- **Replace the label 'Majority non-white areas' with 'Majority people of color,' and be more specific of each district's racial/ethnic make-up**, rather than labeling "homogeneous" or "heterogeneous."
 - Stakeholders felt it was particularly important to evaluate the absence of Black residents. Some neighborhoods seem 'integrated,' but only for White, Asian, and Hispanic residents.
- **Explore more nuanced cut off points** that could show the differences between segregated neighborhoods.
- **Note the direction of change and highlight the neighborhoods that have most or least changed.** Clarify who may have moved in and out (e.g., percent increase in white and non-white population, versus populations that decreased), and potential reasons related to local history.
 - Stakeholders wanted to see a clearer narrative of why changes happened in different areas.
 - Stakeholders also cautioned relying on census data, which has a delay in capturing the patterns of gentrification and displacement.
- **Consider a different definition of poverty.** Some stakeholders noted that the federal poverty rate does not communicate the extent of how poverty is experienced in NYC because of higher costs of living.
- **Analyze segregation of other protected classes over time.** Stakeholders noted it was important to lead with race, but segregation of other groups, such as people with disabilities, are important to capture.
- **Caveat that the level of social integration is not pictured.** Stakeholders wanted to note that while different groups may be living in the same district, the buildings, schools, and spaces can remain very segregated.

Defining High Opportunity Areas

Below is a summary of stakeholders' response questions on how the City should define and measure a "high opportunity area," which was discussed at the Roundtable on Segregation and Integration and the Joint Roundtable on Access to Opportunity:

- Some stakeholders expressed **concern about labeling certain neighborhoods as "high opportunity,"** which connotes value and defaults others as "low opportunity," and could further influence discriminatory investment patterns. Nevertheless, other stakeholders highlighted the **need to identify, acknowledge, and correct historic inequities in investment** between neighborhoods.
- Broadly, stakeholders commonly defined high opportunity areas as places that **promote people's health and economic opportunity, rather than impede it,** and have the **amenities and resources to enable families to climb out of poverty.**
- Beyond the presence of quality amenities and services, stakeholders emphasized these **socio-political factors as important to opportunity:**
 - **Equity in the quality of resources and services.** Stakeholders felt that neighborhoods most in need often get the most inexperienced police, teachers, and outdated technology, even though they face the most challenges.
 - **Participation and self-determination.** Empowerment of communities to contribute to improving their neighborhoods; access to effective and active public officials that inclusively engage residents.

- **Inclusion, accessibility, and freedom from discrimination.** Stakeholders said there are many low-income and public housing residents that currently live in high opportunity areas but cannot afford the goods or don't feel welcomed; homeless individuals cannot access public parks; and residents of color face racism and oppression in policing and the criminal justice system.
 - **Diversity.** While difficult to link to causality, stakeholders said that diverse, non-homogenous communities fare better. Stakeholders noted reservations about including diversity as an indicator of opportunity, but wanted to note the importance of acknowledging its role in outcomes.
 - **Social cohesion.** How people are able to converse, feel safe in their communities, and trust their neighbors can determine how one can live and move through one's neighborhood.
 - **Culturally appropriate and competent services:** Many immigrants, for example, rely on certain neighborhoods to access resources based on identity—in one's own language and with staff, instructors, and service providers who are culturally competent.
- **Specific to health and safety,** stakeholders affirmed defining opportunity as safety from sea level rise and climate change; low asthma risks; distance from waste facilities and environmental burdens such as combined sewer overflows; green space and quality recreational areas; social services access; arts and cultural institution access; healthy and affordable foods access; quality health care and facilities; healthy and safe affordable housing; low crime exposure; and social cohesion.
 - Stakeholders cautioned that self-reported measures of health can be misleading, as some cultures may say they are healthy qualitatively, but quantitatively they are below average.
 - **Specific to education,** stakeholders emphasized measuring opportunity more holistically and qualitatively: by the experience and cultural competency of teachers; afterschool programming availability; civics education; socio-emotional and socio-cultural skills taught; diverse environments; and availability of programs and practices that improve outcomes, especially for Black students.
 - Stakeholders said that current school performance metrics focus on a single test, which upholds white, middle class performance, rather than a quality education experience.
 - Stakeholders said that school quality is an important measure for families, but also noted that the number of New Yorkers who don't have children is also increasing.
 - **Specific to employment and economic opportunity,** stakeholders emphasized access to good paying, low barrier-to-entry jobs; quality job training opportunities; affordable childcare and transit options; affordable goods and services; banking accessible to low-income communities of color; broadband connectivity; quality of early education; affordable homeownership opportunities for a range of incomes; and integration in terms of wealth and education levels in the community, which is important to exposure and social capital.
 - Stakeholders wanted to see a measure of affordable goods and services as a form of opportunity, analyzed by geography, average cost, and income. Stakeholders noted that if you are experiencing poverty, you are cost burdened by everything—not just rent.
 - **Specific to transportation,** stakeholders emphasized opportunity as all neighborhoods having access to fast, efficient, predictable, accessible, connective, and a quality experience in transit. Particularly important for people with disabilities are accessible and reliable transportation infrastructure, including sidewalks. Stakeholders wanted to see measurements of the trips people take beyond work, and trips people don't take because they are too difficult.
 - Stakeholders cautioned over use of tracking transportation usage via technology, considering how different populations can be excluded due to different levels of access.
 - Stakeholders also said that robust transit access is not always necessary if all services that people need are within the neighborhood.

Summary of Recommended Goals and Strategies

This section provides a synthesis of stakeholders' feedback on the top contributing factors that stakeholders identified during the Learn Phase and their recommendations for solutions. This section is organized by the top contributing factors, which include the following* (the list below is a series of hyperlinks that will jump you to respective sections of this document):

*note that the numbers serve as identifiers and do not reflect any order of ranking

1. [The siting and type of affordable and accessible housing in NYC and the region](#)
2. [Disparities in public and private investments, services, and amenities across neighborhoods in NYC and the region](#)
3. [Community opposition to housing and infrastructure investments to accommodate growth in NYC and the region](#)
4. [Challenges to using housing vouchers in NYC and the region, particularly in high-cost areas](#)
5. [Loss of and displacement from housing that is affordable to low- and moderate-income New Yorkers](#)
6. [Discrimination and the enforcement of fair housing laws](#)
7. [Admissions and occupancy restrictions in publicly-supported housing](#)
8. [The availability, type, accessibility, and reliability of public transportation](#)
9. [Location of proficient schools and school assignment policies](#)

Each section begins with stakeholders' feedback on the draft description of the issues under each contributing factors, followed by their recommendations for solutions.

++ indicates that the idea was raised in multiple settings

Contributing Factor #1: The siting and type of affordable and accessible housing in NYC and the region

Issue 1a: Challenges with financing and developing low-income housing in high-cost areas

Stakeholders noted that creating regulated affordable housing units, especially those that are deeply affordable, is particularly challenging in higher-cost neighborhoods. Purchasing land for affordable housing in these areas is prohibitively expensive and high market rents make subsidy programs seem less valuable.

Stakeholders' suggested edits:

- Note the limited amount of publicly-owned land left in these areas.
- Add that with an aging population, siting affordable, accessible housing in high cost areas is especially challenging, and retrofits can be very expensive.
- Include that challenges in siting in these neighborhoods forces the concentration of affordable housing in low-income communities (connected to issue 1c).
- Emphasize that siting of supportive housing is particularly challenging due to costs, worsened by opposition, and is an equity issue that impacts predominately people of color and people with disabilities.
- Note that tax incentives with limited affordability requirements (like 421a) can make deeper affordability programs less competitive. The affordable rents produced in gentrifying areas are often above or at the area's average rents, but still rewards tax breaks to developers.
- Add that mixed market-rate and affordable buildings often have separate buildings, amenities, and different treatment of low-income tenants that limit opportunities for meaningful social integration.

Stakeholders' recommended solutions:

- **Require all newly constructed units, affordable and market rate, to be universally accessible and create guidelines for age-and disability-friendly design++.**
 - Design spaces to enable people to age in place, with designs that serve multiple disabilities and have no expirations.
- **Establish policy and competitive subsidies to prioritize deep affordability in high cost areas++.**
 - Promote deeper affordability levels in these neighborhoods rather than relying on the strong market to subsidize; reform the Qualified Action Plan (QAP) to change incentives for the development of tax credit housing in higher income areas where there is currently little development; tweak term sheets to allow higher developer fees and more subsidy in high opportunity areas; create a fund that developers can tap into to acquire and build affordable and supportive housing in high cost areas; revisit relative value of other tax incentives like 421a.
- **Identify public sites in high cost areas and prioritize deep and permanent affordability++.**
 - Work with non-housing agencies more creatively to find underused, viable land to prioritize deeply affordable and supportive housing.
- **Reform Inclusionary Housing policies to be able to generate deeply affordable and accessible housing, including those that can be accessed by people with extremely low and fixed incomes++.**
- **Eliminate or reform 421a to require greater return on affordable housing and ensure it does not undermine competitiveness of deeper affordable housing programs++.**

- Require a greater percentage of units to be affordable, as well as affordability levels that are deeper, and at minimum percentage below the area’s average rents. Abolish tax breaks for affordable units that are at or above the area’s market rate.
- While some stakeholders recommended eliminating 421a, some stakeholders said that 421a is still necessary to build any affordable housing in the highest cost areas, as City subsidies will never be as competitive in those markets. Alternatives would be needed to continue incentivizing affordability in strong market areas.
- **Create a mandatory affordable housing provision, which requires all residential construction in NYC to include a share of affordable housing, regardless of changes in zoning++.**
 - Incentives are expensive. Hold private developers accountable to promoting integrated living patterns, with stronger limits on what is done on private land beyond MIH, particularly beyond affordability. Some noted that there may be issues of legal authority to implement.
- **Eliminate rules in mixed market-rate and affordable developments that allow separate amenities and require developers to create a cohesive, integrated sense of place for tenants.**
 - Encourage developers to create spaces and programming that incentivize higher income households to be involved in the community and connect with low-income neighbors.
- **Offer a fast-track zoning and permitting approval option for projects, including as-of-right developments, that are achieving goals of promoting fair share in affordable housing in high opportunity areas++**
- **Expand the Department for the Aging (DFTA)’s support for Naturally Occurring Retirement Community (NORC) to bring resources to where older adults already live to age in place.**
 - DFTA’s funding for NORCs could be expanded to reach more developments and neighborhoods with many older adults.
- **Ensure sufficient funding and development of affordable and supportive housing so that there is not the dire need for shelter**

Issue 1b: Barriers to the development of new multi-family housing in high-amenity areas

Stakeholders said that lower-density zoning, historic landmark districts, and opposition to changes that might trigger density and demographic changes in neighborhoods with high-performing schools and healthy environments—particularly at the edges of the outer boroughs and in the city’s adjacent suburbs—limits realistic options for the construction of multi-family housing, especially affordable housing.

Stakeholders’ suggested edits: Add “good transit access” to the list of characteristics of high amenity neighborhoods and note that there are also parts of Manhattan with these characteristics, not just the outer boroughs.

Stakeholders’ recommended solutions:

- **Implement a city-wide approach to MIH rezoning and target high income, high opportunity areas, especially areas that are transit oriented++.**
 - Mandate an upzoning of areas that are less than ¼ mile to rapid transit. Analyze for and prioritize areas with a history of exclusionary practices.

- **Eliminate single family zoning in NYC and allow Accessory Dwelling Units (ADU), subdivisions, and other small homes strategies to expand affordable stock in historically exclusionary areas++.**
 - Transform all R1 districts into R3-2.
- **Curtail historic landmarking or create more discretion in approving landmarking applications to allow building of multifamily and affordable housing in historic districts++.**
 - Historic landmarks can make maintenance and redevelopment costly and get in the way of enabling affordability. Some stakeholders felt it should be curtailed all together, while others felt there needed to be reforms to enable affordable housing.
- **Use legal action to designate certain community districts as exclusive or discriminatory and use that designation to push for more affordable housing in those areas++.**
- **Remove 12-FAR cap to enable growth and promote economic integration.**
- **End zonings that reduce development capacity.**

Issue 1c: Deep affordability in high-poverty areas

Stakeholders said that there is a need for deeper affordable housing in high-poverty areas to match local needs. But new deeply affordable housing in high-poverty areas may further concentrate low-income New Yorkers and special needs populations in these neighborhoods, which often already have overburdened schools, services, and infrastructure (e.g., schools and hospitals with high volume of constituents living in poverty).

Stakeholders' suggested edits:

- May need to re-frame this issue as 'Concentration of Poverty' to clarify.
- Some stakeholders did not think that concentration of deep affordability was necessarily problematic, but emphasized the problem of inequities in opportunities that low-income communities have to build wealth and climb out of a state of poverty.

Stakeholders' recommended solutions:

- **Develop affordable housing paired with jobs and programming for tenants to build wealth and potentially step into higher opportunity housing++.**
 - Build in requirements for affordable housing developers to include programing and partnerships to support low income tenants' upward mobility.
- **Reinvest deeply in public housing quality and programming for residents to climb out of poverty; and create solutions for the gap in federal funding++.**
- **Tie community infrastructure investments with incoming affordable housing to support residents' overall wealth and wellbeing++.**
 - Invest the Neighborhood Development Fund (NDF) to build community infrastructure, including transportation, for major affordable housing developments in historically disinvested areas, not just rezoning areas. Promote the creation of community development infrastructure in the ground floor spaces of affordable housing (e.g., cooperative work, day cares, banks, enterprises, etc.).

- **Strategically place affordable housing near accessible transit and/or add more accessible transit options nearby that connect people to employment and services++.**
 - Ensure access to accessible transportation when developing affordable housing, particularly for people with physical, sensory, or intellectual disabilities
- **In areas with already high concentration of publicly-supported housing, assess surrounding income bands to inform decisions on financing new units in the area and avoid concentrating certain bands.**

Issue 1d: Mixed-income affordability in high-poverty areas

Stakeholders expressed concern that new affordable housing projects that include moderate- or middle-income rental units in high-poverty neighborhoods may spur gentrification and displacement.

Stakeholders' recommended solutions:

- **Recalibrate Housing New York to increase units serving the lowest-income and/or homeless households, rather than moderate and middle incomes ++.**
 - People earning over 120% of AMI are still well served by the market in NYC. Set aside 10% of the 300,000 unit target to be for homeless New Yorkers, with minimum 24,000 in new construction. Pass Intro 1211 to mandate developers who receive City funding to set aside 15% of units for homeless New Yorkers. Increase number of units available for those earning 30% of AMI and below.
- **Adjust term sheets for different types of markets; ensure affordability bands are below market and not inaccessible (too high) for the neighborhoods in which they are located++.**
 - Some stakeholders suggested matching term sheets to neighborhood AMI's, while others noted the potential fair housing implications of this, but recognized the importance of ensuring affordable units are not out of reach and contributing to gentrification.
- **In high poverty areas, substitute middle / moderate rentals with affordable homeownership / limited equity co-op opportunities++.**
 - There is high demand and limited supply for affordable homeownership; this can enable residents to build wealth and avoid increasing average neighborhood rents; enable next family to purchase home affordably too.

Contributing Factor #2: Disparities in public and private investments, services, and amenities across neighborhoods in NYC and the region

Issue 2a: Equity-based investments

Stakeholders noted a historic and, in some cases, ongoing failure to invest in housing quality, schools, environments, and physical infrastructure in neighborhoods of color, which has led to disparities in access to opportunity and overburdened social infrastructure. Simultaneously, many residents fear certain investments could increase property value and lead to displacement.

Stakeholders' suggested edits:

- Include more explicit reference to historic racism in this description.
- Emphasize there is not enough transparency and self-determination for communities on investment decisions.
- Add that on top of already inequitable historic investments, marginalized communities are burdened by increasing sewage and storm water challenges of a growing city.
- Acknowledge that the focus on 'growth' and target production numbers to measure success limits the ability to measure the actual quality and impact of initiatives on the lives of people who need the investments most (e.g., about the # of jobs and income, but not about who gets the job).

Stakeholders' recommended solutions:

- **Create a commercial rent stabilization or discounted retail rent program to prevent gentrification, and enable small businesses and non-profits that provide affordable goods and key services to operate in high cost areas++.**
 - Target high cost neighborhoods or gentrifying neighborhoods, where low income residents have a hard time affording groceries and other goods, which impacts residents' ability to afford rent. This can also fill empty storefronts, and help community facilities to support overcapacity community resources that carry the burden or supporting residents in needs.
- **Conduct comprehensive neighborhood-level community planning with a racial equity lens to align capital investments with neighborhood needs and improve access to opportunity++.**
 - Conduct needs assessment of infrastructure and services across the city, particularly for low-income communities of color, which includes school capacity analysis, open space, demographic analysis, etc., similar to 197-A plans.
 - Track City investments by CD and make public maps that include layers of income and race. Use this to make more participatory and equitable decisions on investments, and distributing burdens and benefits of the growth of the city. Stakeholders noted that what neighborhoods got out of the rezonings should have happened without the rezoning.
 - Train City agencies to do comprehensive planning and deliver services with an equity and fair housing lens. Assess whether policies and investments might have racist impacts and whether they are furthering fair housing.
 - Create an advisory group to help shape projects to better achieve justice and equity goals, and review and monitor long-term impacts.
- **Establish a policy that development on city-owned land should only be used to prevent or reverse the impacts of historical disinvestments in communities.**

- **Require private developers to do a fair housing analysis with each project++.**
 - Require developers to assess and correct potential development impacts on segregation and reinforcement of disparities in access to opportunity.
- **Explore a resolution, impact fee, or other type of public value recovery mechanism to redistribute investments and return on land value via development ++.**
 - Whenever there is a public or private action that creates increase in land value, it is disproportionately accrued by the private market rather than for the greater public. Explore and create land value capture models for New York City that redistribute money into public housing, school, and environmental improvements.
- **Make the City Planning Commission independent and separate from the Department of City Planning.**
 - Ensure the Commission is represented by individuals that are independent and neutral of bodies that may be coming to present, including the Department of City Planning.
- **Shift away from austerity and numbers to measure success (e.g., # of jobs, # of units), and focus on the quality and impact of investments to help get people out of conditions of poverty++.**
 - For example, a jobs plan that leads to a big number of jobs that low-income communities of color do not qualify for is not an equitable economic development strategy.
- **Implement a “healthy housing for all” initiative to educate on, and standardize the incorporation of, holistic health strategies in the design of housing.**
- **Intentionally and equitably invest in schools in high poverty neighborhoods to improve the quality of instruction, facilities, and supplementary programming++.**
 - Set funding aside to rehabilitate schools in low-income communities of color that may have high needs yet lower supplementary PTA funds so they are in good condition and promote a positive learning environment. Reevaluate design and features (bars on the windows, metal detectors, ceilings, and façades) so young people can be excited to attend school. Build elevators and other accessibility features for students, teachers, and parents with disabilities.
- **Prioritize equitable broadband and tech access for low-income neighborhoods to address historic disinvestment by the private sector.**
- **Promote more equitable access to public space and arts that is culturally diverse and rich.**
 - Prioritize neighborhoods with disparate access to arts and public spaces.
- **Require more transparency, oversight, and participation of NYCHA residents in decision making to help inform new development on NYCHA land.**
 - Give NYCHA residents more say and invite people to forge a good solution.
- **Incorporate universal design into all public design initiatives.**
 - All units, buildings, and infrastructure funded by the City should incorporate universal design features.

Issue 2b: Limited financial services

Stakeholders said that neighborhoods of color are served by limited financial services, which impedes personal and community wealth-building. Additionally, stakeholders expressed concern that the Community Reinvestment Act is being used to gentrify neighborhoods historically populated by people of color, while not actually benefiting existing residents in need.

Stakeholders' suggested edits:

- Add that there are often gaps in financial literacy and credit history barriers that people face to obtain financial services.
- Add that communities have a high distrust of banks, and relationships need to be repaired.
- Add that prospective homebuyers of color are less likely to have wealth to save for a down payment.

Stakeholders' recommended solutions:

- **Expand down payment assistance and forgivable loan programs for low-income people of color to achieve homeownership ++.**
 - NYC has a program but it fluctuates based on funding. At some point it was up to 130% of AMI, but funding ran out. Resources for down payment assistance programs should be expanded, and eligibility should be increased above 80% of AMI to maximize down payment assistance. Cities such as Seattle and Boston go above 80% AMI and have higher grants that go above \$40K. These cities levy tax to support down payment assistance.
- **Expand partnership with OFE and other financial institutions to help tenants improve financial literacy and build wealth and credit++.**
 - Include wealth development management courses for New Yorkers, including Housing Connect applicants, to understand savings, credit, mortgages, loans, etc.
- **Establish a Rent as a Credit Building Tool system to enable rental history payment to be used to build credit scores++.**
 - Rent reporting pilot is helping NYCHA residents in the Rockaways and LIC build credit.
- **Teach life skills in K-12 public school classrooms and afterschool programs, like financial management, civics, health and wellness, and others that impact economic opportunity in adulthood++**
- **Modernize the Community Reinvestment Act and incentivize banks to invest in low-income communities, prioritizing funding for low-income people of color++.**
 - Collect comprehensive lending data and CRA tracking; track smaller banks not subject to CRA.
- **Partner with banks to create products that reduce barriers to banking in high need areas, including financial education and credit for communities to invest in their neighborhoods++.**
 - Banking programs need to be targeted to neighborhood needs, including language, hours, and other cultural barriers. Communities need a way to build trust with banks.
- **Create a NYC Public Bank and conduct public-private partnership to create funding for Community Development Financial Institutions (CDFIs).**

- The state will no longer fund CDFIs. City should partner with organizations that fight for CDFI funding and should have a public bank that can take investments; provide opportunities to underserved communities to invest in their neighborhoods; tap money from Wall Street.
- **Expand programs that help parents save money for college for their children.**

Issue 2c: Insufficient programs and pathways to sustainable careers

Stakeholders said that some job training programs, which target communities of color that currently experience high unemployment, do not focus on the right skills and do not lead residents to meaningful, career pathways (e.g. stakeholders worried about long-term prospects for low-wage retail and security jobs). Residents also face challenges to participate in job training programs due to childcare, transportation costs, and income needs.

Stakeholders' suggested edit: Emphasize that many people face challenges in participating in training and apprenticeship programs due to gaps in required math and reading skills, and the demand for bridge programs to develop these skills is greater than the supply.

Stakeholders' recommended solutions:

- **Establish an equity approach to NYC economic development and coordinate robust programs to enhance capacities of low-income New Yorkers to have economic mobility++.**
 - Incorporate equity into mission and decision making, including RFPs, and have a third party monitor. Create strategies to coordinate increased wages, expand career pathways, job training, and job readiness programs that focus on marketable skills for living wage jobs. Expand industry partnerships to systematize engaging employers in informing training programs. Focus on improving outcomes particularly for people of color and people with disabilities.
- **Require and support developers and employers to conduct not only local hiring, but also early targeted local workforce development++.**
 - Current residents want to be prepared and trained for the jobs created through development in their neighborhood. Challenge: legal constraints of requiring local hiring.
- **Enable community preferences for new jobs for historically low-income communities++.**
 - Need to specifically target traditionally low-income people and people of color who are most disadvantaged.
- **Expand bridge programs that develop remedial math and reading skills required for many training programs, with geographic recruitment strategies that target areas in most need.**
- **Invest in stronger math and reading education in 3K-high school.**
 - Short workforce program in adulthood can't make up for lack of investment in early education throughout primary and secondary school.
- **Expand tech training programs targeting high need populations, such as justice involved individuals, to gain the basic skills for employment.**
- **Preserve and promote industrial jobs, which proponents say offer living wages, stability, and professional growth, while having low barriers to entry.**

- Restrict M-zones from residential conversions..
- **Create and fund real long-term career pathway and guidance programs.**
 - Often, there are many people who aren't ready to start job training and have deeper needs to be addressed that require bigger investment in supports. Once they leave a program and get a good job, it is just the start of their career, and they need long-term support.
- **Develop quality distance learning programs that enable people to get the education and training they need to move and improve their careers, regardless of their work schedules.**

Issue 2d: Policing and criminal justice.

Stakeholders noted that disparities in policing and the criminal justice system disproportionately affect people of color and create long-term outcomes that affect their access to quality housing, employment, health and safety, and economic opportunity.

Stakeholders' suggested edits:

- Emphasize socioeconomic instability and poor wellbeing of residents as root causes of crime.
- More clearly articulate racial bias and disparities in policing and arrests, with racism as the root.
- Emphasize that over-surveillance of communities of color, particularly in public housing and gentrifying neighborhoods can lead to disparate arrests and prosecutions, and takes away one's ability to participate in civil society and often leaves one in a cycle of institutions.
- Add that there is currently limited transparency and information available to the public to hold the criminal justice system more accountable and create more informed policy.

Stakeholders' recommended solutions:

- **Implement a racial justice, restorative justice approach to engaging with residents around issues of crime and safety; create alternatives to policing, including promoting community accountability++.**
 - Reach the most victimized and perpetrated and invest in addressing the root cause of people's socioeconomic conditions. The key to safety is a cohesive community who trust one other and can be first responders in situations of crisis. Create opportunities to build social cohesion, bring communities together, and have honest conversations about shared values, trust, and accountability.
- **Redirect funding from police forces and into community-based organizations (CBOs) to do interventions to promote stability++; train police to work with community-based organizations.**
 - CBOs are often more competent in engaging with DV survivors, LGBTQ individuals, immigrants, and other groups, who have trusted relationships with these organizations. Neighborhoods are often not cohesive and there are specific needs of certain populations that need more nuanced solutions.
- **Reduce surveillance of communities of color and break the connection between 311 calls and the NYPD++.**
 - The increase in 311 calls in gentrifying neighborhoods can contribute to increased surveillance on residents of color, and may lead to disparate arrests and prosecutions.
- **Avoid the use of data-based algorithms to deploy officers.**
 - Biases can be baked within algorithms and perpetuate the over-surveillance of areas with more low income people of color.

- **Assign mental health liaisons for each neighborhood and create alternative response systems for residents to call to for crises involving someone with a mental disability, other than the police.**
- **Train landlords to conduct tenant mediation regarding noise complaints and other minor issues rather than resorting to calling the police or pursuing eviction.**
 - Complaints about noise to landlords in mixed market-rate and affordable buildings have led to housing court cases to evict those tenants.
- **Reduce the number of unnecessary arrests, especially custodial arrests, and legalize minor offenses like marijuana to address the inequitable history of criminal justice++.**
 - Officers have the discretion to make non-custodial arrests, such as getting a ticket for riding a bike on the sidewalk or for littering, which can have disproportionate impact against New Yorkers of color and collateral consequences for undocumented New Yorkers. Stakeholders cautioned as a potential unintended consequence that if responses are perceived as too soft by the greater public, the next administration or policy might respond with even harsher enforcement.
- **Conduct frequent implicit and explicit bias training for police, and create metrics to measure impact and accountability.**
 - First half of bias training is awareness, but police also need continued training to reinforce concepts, to learn the steps to manage bias, and apply concrete tools to use instead of gut instincts. Create more avenues for community accountability to what the trainings are doing; track the impact and share back with the public.
- **Assign culturally competent officers to work with low income communities, especially public housing residents, to improve relations with communities.**
- **Shift metrics for police success and promotion to community-mindedness and cultural competence, rather than number of arrests and conviction rates.**
 - Create measures to reward positive community relations, and discourage any cultures of violence, toxic masculinity, and white supremacy.
- **Require mandatory full legal representation in NYCHA Administrative Hearings and establish more easily accessible locations for hearings.**
 - Currently, not all NYCHA residents have full representation. Additionally, decentralizing hearing space by having more in outer boroughs would present greater access for residents.
- **Discourage the District Attorney's Office from bringing cases in criminal court to Housing Court and compelling landlords to bring a case.**
 - In many cases brought by NYPD and DA in Supreme Court (such as alleged drug activity), it has been easier and better to settle a case with flexible terms. However, the DA will sometimes bring the case to Housing Court by compelling the landlord to bring a case or else sue both, alleging collusion. Once in Housing Court, it is difficult to settle, and this threatens housing instability for the individual (even after the case has been settled).
- **Expand support available for families impacted by the criminal justice system.**

- Families whose ‘breadwinners’ have been incarcerated don’t have support. Expand Children of Promise (non-profit) programming citywide. Target neighborhoods and communities with high number of reentry individuals.
- **Create robust, anti-recidivism, reentry and discharge services that include stable housing and employment++.**
 - Funding these solutions would save money in re-arrests, shelters, rehabilitation/treatment, etc.
- **Enact legislation for expungement and require court systems to go through records to automatically expunge++.**
 - As part of the Raise the Age legislation, eligibility for expungement was expanded, but still falls behind other states. Currently, to be eligible, you must have waited 10 years free of other convictions, and be limited to 1 felony and 2 overall offenses (other states are 3-5 years and sometimes less especially for non-violent crimes). For people who have served their time or have been arrested, they should not be denied housing.
- **Increase public reporting and transparency from NYPD, including the joint remedial process++.**
 - Allow access to what officers are required to report, pursuant to the State Transparency Initiatives: information on low level infractions, demographic and geographic information, and the number of people who die in police custody. The City should report Level 1 and Level 2 encounters, which are encounters where people are legally free to leave. Use this data to inform policy solutions. These will allow more community oversight and could significantly improve disciplinary measures.
- **Reform laws to hold officers accountable for misconduct, including repealing the Civil Rights Statute 50A (“police secrecy” statute) and expanding and codifying Executive Order 147 (Special Prosecutor).**
 - The Civil Rights Statute 50A shields misconduct histories of officers from public view. Executive Order 147 requires the Special Prosecutor to include the investigation and, if warranted, prosecution of certain matters involving the death of an unarmed civilian, whether in custody or not, caused by a law enforcement officer.

Issue 2e: Environmental justice

Stakeholders said that many neighborhoods of color—particularly ones that are high-poverty—are over-concentrated with waste transfer stations, bus depots, truck routes, shelters, jails, and climate vulnerability, while high-income or predominantly white communities have few or none.

Stakeholders’ recommended solutions:

- **Implement an equity / fair share model to guide decision making to relieve burden from low-income communities of color in the siting of hazardous and/or unwanted facilities++.**
 - Ensure they are placed in high income neighborhoods also and not being oversaturated in low-income neighborhoods.
- **Take down highways and restructure interstates to improve air quality for communities of color and reduce fragmentation.**
- **Adopt practices that reduce air pollutants and waste/heat pollution by reducing truck traffic and improving air quality regulation for expressways and local factories that are near low-income communities++.**

- Conduct monitoring indoor and outdoor. Need iterative process with the public and implement what people have agreed upon.
- **Implement waste reduction initiatives, not just waste relocation, from low-income communities of color.**
- **Create opportunities for residents, including building managers and owners, to be involved in environmental monitoring and improvement, whether in their own units, building, or neighborhood overall.**
 - Establish Resiliency Education Training and Innovation (RETI) centers that can train people, especially public housing residents and young people, on toxins, life skills, trainings, EPA/HUD/DEP drainage, and climate resiliency in their community.
- **Establish financial vehicles, such as tax levies, that leverage new residential development to fund resilience improvements.**
 - Leverage new development to fund sewage system upgrades to prevent flooding in the future, fix insulation, façade and building envelope, HVAC updates, etc. Need to distribute money from upstream to downstream—where the impact happens.
- **Expand income-based resiliency and energy efficiency measures for low-income homeowners.**
- **Increase quality green space and tree canopy, especially for low-income communities of color++.**
 - Ensure accessibility and openness to the public, including access for homeless people. Ensure maintenance of spaces too.
- **Expand Be a Buddy Program and other initiatives to foster community cohesion and get neighbors to check in on each other++.**
 - Promotes community resiliency in the midst of climate vulnerability.

Issue 2f: Indoor health hazards

Stakeholders said that people of color, particularly those who live in public housing, are overexposed to indoor hazards such as pests, mold, and lead paint, which can directly impact children’s learning abilities and residents’ physical and mental health.

Stakeholders’ suggested edit:

- Add reactive system of code enforcement and the limited capacity of the City to get involved in housing quality court cases as a challenge.
- Add that current home repair programs do not provide enough financing to make significant and critical home repairs in a timely manner.

Stakeholders’ recommended solutions:

- **Find ways to invest more heavily in the preservation of public housing++.**
 - Find creative ways to raise money and spend effectively at NYCHA, e.g., using transferable air rights, etc.
 - Hold NYCHA more accountable to addressing housing quality issues (311, violations from HPD, judicial penalties, or other incentives that do not necessarily add financial burden but compels improvements to indoor housing hazards).

- **Increase HPD court proceedings to increase City’s role in intervening in housing quality cases.**
- **Establish rules for remediation to address underlying conditions, and create standardized best practices from cost and effectiveness, especially for mold removal++.**
 - Identifying and addressing causes of leaks, mold, mildew, and other indoor hazards can save landlords and the City more money in the long run, and improve tenants’ housing quality. Local law 55 and 61
- **Require quality management and maintenance in affordable housing; provide trainings for property managers on relationships with tenants and responding to health issues.**
 - Example of James Weldon Johnson Houses in East Harlem where the manager gives his cell phone to tenants and it is very well managed. Need to share best practices to help train managers to build relationships and be able to identify abuse or other health-hazardous behaviors. Research shows doormen can be eyes and ears of a facility.
- **Increase funding to support compliance with Local Law 55 (2018) among low-income homeowners.**
 - This law, sometimes informally referred to as the “Asthma Free Housing Act,” compels landlords to address pest and mold issues, but does not provide funding for owners who need help do it; need carrots and sticks.
- **Create a forgivable emergency repair program for good property managers that may be struggling to repair older buildings for their tenants.**
 - Waiting for a loan from the City can take too long, and emergency repair loans often cost too much. Prioritize tenant safety and health first.
- **Expand basement legalization pilot and legalize safe basement apartments.**
 - Illegal basement dwellings pose a risk to tenants and homeowners. Legalization of safe apartments provides health and safety benefits as well as much needed income for LMI homeowners.
- **Provide affordable financing for home repairs, efficiency retrofits, resiliency investments, and accessibility modifications to enable seniors to age in place.**
 - These programs should be well-funded and easy to access for low-income, senior, and physically disabled homeowners. Financing should also be made available for flood retrofitting to increase coastal resiliency and offset flood insurance hikes. HomeFix is a great first step towards meeting this need.

Contributing Factor #3: Community opposition to housing and infrastructure investments to accommodate growth in NYC and the region

Issue 3a: Power imbalance across communities that have a voice in approving or disapproving local investments

Stakeholders expressed concern that public and discretionary review processes can amplify the voices of wealthier, White residents, who have the time, opportunity, and political power to facilitate opposition to increases in density, homeless shelters, and undesirable infrastructure necessary for the City's growth. Stakeholders noted that opposition to projects in higher income areas, often rooted in discrimination against specific groups, can lead to successful blocking of projects in these areas and consequently, the concentration of these uses in high-poverty neighborhoods and communities of color

Stakeholders' suggested edits:

- Add that much of opposition is rooted in privilege and often a sense of entitlement rooted in race and class, which is the most difficult to combat.
- Add that in many communities, Community Boards are not representative and have halted much investment in their communities.
- Add that stakeholders feel that power imbalance is about political will.

Stakeholders' recommended solutions:

- **Create a PR campaign to publicize great examples of supportive and affordable housing that has been built, their tenants, and their impact to address stigma++.**
 - Need a PSA, such as the Everyone in LA campaign, on how people become homeless in the first place that humanizes tenants. Could create a social media campaign that is youth-led and owned to conduct interviews. Include a wide variety of stakeholders, including businesses, churches, community leaders, and non-governmental groups. Currently, supportive housing developers rely on Community Preference as a carrot used to get community buy-in and push back against opposition.
- **Create a "Leadership Institute" focus group that brings in leaders, organizations, and residents in white wealthy neighborhoods to discuss how to address opposition and challenges in bringing affordable housing++.**
 - Have honest and collaborative discussion on challenges, how to get buy-in in their own communities, and solutions. Currently happening in Connecticut; includes a public education process disseminating info to combat opposition via social media (where sentiments are often shared). Be careful to not backfire and put burden on people of color to educate White people on these issues.
- **Need more investment in educating communities about the historical context around segregation.**
- **Require better representation on Community Boards of historically marginalized populations that exist within Community Districts, including NYCHA residents++.**
 - Require comprehensive diversity plans for each board. Create a stipend for these populations to participate. Impose language access requirements.
- **Reevaluate Community Board system of input to address imbalance of power and create a different system for public participation to inform new development++.**
 - Stakeholders suggested a range of ideas, from changing power based on neighborhood income, eliminating Community Boards overall, to eliminating their recommendation vote. Require more

meaningful incorporation of voices of low-income residents. Create a civic technology tool to enable citizens to more easily comment on policies and give people the opportunity to weigh in.

- **Shift power of Council Member to be advisory rather than a final decision regarding affordable housing in neighborhoods that need it.**
 - Elected officials should only be able to advise, not kill an idea, especially if it gets in the way of developing affordable housing for the neediest people.
- **Amend the charter to allow passage of a citywide zoning amendment to only require the Borough Board instead of all 59 Community Boards.**
 - This makes process to pass city-wide equity initiatives like MIH less prone to opposition and easier to create city-wide zoning codes.
- **Create ULURP bypass and/or fast track approvals for projects that promote equity and city-wide needs (e.g., transit accessibility, 100% affordable housing, supportive housing, sanitation garages, school seats, etc.) ++.**
 - Stakeholders noted a need for centralized decision-making to address stigma and opposition. Make clear to NIMBY communities that these are priority investments by the City. There should also be a greater level of education among City agencies on how length of time to obtain permitting and approvals can significantly slow down the process of building affordable housing.
- **Create a state-wide Housing Appeals Board (HAB) to override local zoning decisions that are limiting affordable housing proposals and fast track proposals that have delays due to opposition.**
- **Create a fund that can be used by developers and the community to fight opposition against affordable housing in high opportunity areas++.**
 - Allow non-profit developers to use funds to connect with community relations consultants to help to organize and bring different people together to advocate on community needs. Stakeholders also questioned the lawful use of public funds and potential perceptions of conflict of interest.
- **Mandate affordable housing to include usable, quality green space, quality design, and attractive amenities++.**
 - If affordable housing were appealing and brought additional environmental benefits, it may be more appealing to communities and overcome opposition justified on aesthetics.

Issue 3b: Fear of investments in high-poverty neighborhoods, leading to local opposition of individual projects

Stakeholders said that high-poverty communities perceive development and revitalization, including affordable housing and improvements to neighborhood amenities, as potential triggers of gentrification and eventual displacement. As a result, current residents may oppose a development project as serving new residents, but not existing residents.

Stakeholders' suggested edit:

- Add that the root cause of this opposition is that the benefits of new development are often not accessible and historically has contributed to displacement.
- Add that residents place a lot of pressure on single development negotiations because people feel current systems in the neighborhood are not working, making it an outlet for people to try to solve all other neighborhood problems.

Stakeholders' recommended solutions:

- **End upzonings in low-income communities of color; instead target high income neighborhoods for MIH, while working with mission-driven groups in low income areas++.**
- **Enable means for communities and their elected representatives to conduct community-based planning to bring major capital resources to their neighborhoods++.**
 - Stakeholders noted that CMs operate in a context of historic disinvestments in some areas and have no choice but to approve rezonings and the investments they promise to come with. Many elected officials want to do the right thing, and with very few tools the City provides to re-invest in neighborhoods, some must rely on rezonings to bring investments. If there were a fair share and equity approach to investments, communities that have historically been disinvested would get the investments they have long needed.
- **Conduct transparent and accountable community-based planning from the beginning stages that engage those that might be most impacted.**
 - Lack of transparency and clarity makes it difficult to allow people to advocate for their own neighborhoods. City outreach has been limited and the burden is often placed on CBO's to make sure folks come to meetings, without resources from the City.
- **Require new development in low-income communities of color to incorporate expansive community benefits and build a sense of ownership for surrounding residents ++.**
 - Ensure that public spaces and retail are accessible and free of discrimination. Ensure that new development contributes to promoting health, affordability, and job opportunities of surrounding residents. Establish a framework and standard process so groups can more meaningfully contribute to shaping CBAs before final decisions are made. Require community-based, non-profit partnerships. Expand Community Benefits Agreements and establish a framework and standard process so groups can more meaningfully contribute before final decisions are made.
- **Make information about projects in public process more clear, transparent, and accessible for lay people to understand++.**
 - Zoning text can be very technical and takes years of experience to understand. Opposition on projects often occurs because people have the wrong information. Hire culturally competent City staff who can better communicate with residents.
- **Conduct city-wide displacement analysis and address before incentivizing new development++.**
 - There are a lot of issues leading to displacement, and communities would feel more trust if these were articulated and studied (rather than denied that they are happening).
- **Reform CEQR, including analysis of displacement, school seats capacity, fair housing impact, and requirements and enforcement of mitigations to address current and future needs++.**
 - Capture benefits from new development as a form of reparations for historically impacted communities. Reform the impact analysis on school seats to look at actual zones and charter schools. Require and enforce CEQR mitigation. Projects should only be allowed to proceed if existing needs and risks are measured and met and displacement risks are absent.
 - Challenges to address: oversight; enforcement of mitigation to the scale of the problem; not discouraging private investments in areas with lots of need.

- **Create a right to return provision for people who have been displaced to be able to return to their communities in new affordable housing, including funding to support relocation.**

Issue 3c: Perceived piecemeal development leading to local opposition of individual projects

Stakeholders said that perceived piecemeal development allows organized communities to argue that specific projects are out of context, without considering the city's overall needs. Stakeholders also noted that there are some existing city-wide plans, but communities lack information or have misinformation about them.

Stakeholders' recommended solutions

- **Conduct comprehensive, localized fair housing analysis and mandate fair share growth targets in deeply affordable and supportive housing for each community and district++.**
 - Conduct either by CB or general areas (e.g., North Brooklyn, Central Queens) to more deeply analyze changes in living patterns; displacement risks; levels of community opposition. Give some discretion on how to achieve those goals to allow community voice. Prioritize production in areas with lower than fair share amount. Make it impossible for communities to reject an affordable project if a community does not have its fair share of deeply affordable housing. Emphasize bringing opportunity for protected classes where they are not currently concentrated. Have a neutral third party conduct the assessment.
- **Combine the City's housing and homelessness policies.**
 - It is unfair that in NIMBYism shelters are considered "unwanted uses" in the same category as waste facilities, which can reinforce the stigmatism around homeless families. The separation from shelters to affordable housing can continue to reinforce a stigma against homeless families.

Contributing Factor #4: Challenges to using housing vouchers in NYC and the region, particularly in high-cost areas

Issue 4a: Rental allowance limits

Stakeholders said that housing vouchers do not provide sufficient rental assistance to provide tenants with realistic options to live in integrated, high-amenity neighborhoods.

Stakeholders' suggested edits:

- In addition to Section 8 vouchers, City vouchers (CITYFHEPS) and state voucher FHEPs are not competitive in the New York City market, leaving recipients in competition for units in an extremely limited pool of housing in a few far neighborhoods, reinforcing economic and often racial segregation.
- Note the fact that increases in voucher amounts are tied to Rent Guidelines Board votes, which can pit the interest of rent stabilized tenants facing steep increases against the interests of homeless families with vouchers looking for housing.

Stakeholders' recommended solutions:

- **Increase allowance limits to meet fair market rents in NYC, particularly in high cost areas++.**
 - Raise limits to meet actual FMRs. Potentially establish Small Areas FMR with current FMR as the floor, to prevent reduced payments in lower-rent areas that could force tenants to pay more; landlords should receive no less than FMR but should get more in higher rent neighborhoods to increase access to those areas. Increases in voucher amounts should not be tied to Rent Guidelines Board vote, but rather to the FMR.
- **Give lottery preference, especially higher income units that may still be vacant, to residents with a voucher++.**
 - Need data on how many voucher holders are getting housing lottery units.
- **Allow voucher holders to merge voucher benefits together and live in shared spaces (rooming).**
 - Shared spaces are better than shelter as an option for some individuals and families
- **Relocate willing families or individuals outside of the five boroughs in the region, where housing is more affordable and homeownership more possible; create jobs and incentives in those areas.**
 - Still need to address NIMBY issues and SOI discrimination in the region.
- **Increase rental allowance limits on NYCHA RAD Conversations.**
 - Concerns that not all tenants living in portfolios that will undergo RAD will be in the threshold of the current allowance. More transparency needed, so tenants can start planning ahead.
- **Create a City-funded Section 8 program at scale.**

Issue 4b: Barriers to landlords accepting vouchers

Despite New York City's ban on source of income discrimination, stakeholders said that landlords frequently reject tenants with housing vouchers for reasons including burdensome administrative requirements, communication barriers, and outright discrimination.

Stakeholders' suggested edits:

- Add payment structure and delayed payment challenges, as well as limited support for landlords to get units to pass inspection requirements.
- Add that landlords have been maintaining apartments to such low standards that the voucher program stops paying and the landlord can successfully 'evict' the tenant through non-payment.

Stakeholders recommended:

- **Simplify landlord compliance and make voucher payments on time; consider up-front payments to create an incentive to take vouchers, or a fund that helps ensure payments++.**
 - A stakeholder suggested creating a fund that helps ensure payment to landlords if there are problems with a voucher holder. Another stakeholder argued that this might give into the false narrative that voucher holder tenants as problematic compared to 'normal tenants.'
- **Streamline and standardize the different types of vouchers and create a clear contact list to troubleshoot voucher issues for landlords++.**
 - Los Angeles, for example, has an overall flexible housing subsidy pool. A non-profit broker exists and there is a risk mitigation fund.
- **Work with non-profits to act as brokers to help find housing.**
 - However, another stakeholder cautioned that this may concentrate voucher holders in specific places with specific landlords, and staff need to be trained well.
- **Create incentives and communicate benefits for landlords to accept vouchers++.**
 - Stakeholders suggested loan forgiveness programs or a Next Available Unit credit that landlords can opt into. As a unit becomes vacant, if a landlord gives it to a voucher holder, they can get some type of credit.
- **Run a targeted city-wide education campaign to educate tenants and landlords on source of income discrimination and rights and responsibilities++.**
- **Create a program for small mixed-use buildings (e.g., commercial in ground floor with vacant upper floors) to renovate and rent their unit to Section 8 or other City voucher holders.**
- **Change inspection, enforcement, and court protocols to hold landlords accountable for evicting voucher holders++.**
 - Landlords evict voucher holders by failing a Section 8 inspection, which triggers the end of a Section 8 payment and enables the landlord to take them to Housing Court. Have HPD and NYCHA make the repairs directly and bill to the landlord. Further educate judges on these issues so voucher holders are not kicked out through the court system. If landlord has multiple buildings, they should be required to house a tenant in another unit (even if temporary for when repairs are made).
- **Evaluate housing rehabilitation programs and create other support to help landlords with funding repairs if they cannot hold their buildings up to standards for tenants.**
- **Expand section 8 voucher access for everyone, from homeless to middle income++.**
 - Bigger constituency could mean it is more widely accepted by landlords if they were more common.

Issue 4c: Support and counseling on neighborhood choice

Stakeholders said that some staff at relevant agencies exclusively direct voucher holders to the same neighborhoods—which are predominantly communities of color—where they know landlords are more likely to accept vouchers. Stakeholders also said that families with children do not receive adequate counseling around decision-making on how to use vouchers to direct their children to high-performing schools, both across New York City and in suburban areas. Stakeholders also noted social challenges faced by households that move into predominantly White, high-cost areas, in addition to differences in policing, isolation from supportive networks and service providers, and an inability to afford groceries and other goods.

Stakeholders' suggested edits: Add that stakeholders reported various agencies giving conflicting and/or misinformation to clients.

Stakeholders' recommended solutions:

- **Streamline information and properly train and support staff that serve as information points on vouchers to ensure clear and accurate information sharing++.**
 - Include more support in choosing high opportunity neighborhoods and finding apartments. Train Family Welcome Centers and shelter staff to provide proper info to families about choice when it comes to schools.
- **Partner with CBOs, faith communities, and schools to provide counseling services for families looking for housing with a voucher.**

Issue 4d: Language access barriers

Stakeholders identified barriers to receiving and using vouchers for certain racial and ethnic groups, including limited outreach, education, and support available for tenants and landlords with limited English proficiency.

Stakeholders suggested:

- Add citizenship status barriers—there is a lack of clarity on eligibility related to citizenship, and community-based organizations serving these populations often don't know how to respond.
- Add that better sign-language interpretation is also needed.

Stakeholders' recommended solutions:

- **Clarify the voucher eligibility and application process for immigrants and mixed- status families, and train and support community-based organizations that serve immigrants on these processes++.**
- **Improve multilingual outreach for owners who speak English as a second language to accept vouchers.**

Contributing Factor #5: Loss of and displacement from housing that is affordable to low- and moderate-income New Yorkers

Issue 5a: Tenant Protections

Stakeholders said that historical changes to the rent stabilization laws have led to an increase in harassment, evictions, and deregulation, which contribute to the loss of neighborhood diversity. Stakeholders noted that families who have been forced to move have fewer housing choices and often end up living in lower quality housing, overcrowded units, and/or more segregated neighborhoods.

Stakeholders' suggested edits:

- Add the issue of homeowner displacement, particularly homeowners of color, through foreclosure and scams that lead to loss of affordable housing for both the owner and their tenants.
- Make more explicit issues with housing court, including the duration of cases that might lead to losing an apartment and the lack of appropriate sign language interpreters.
- Add persistent unfair buy-outs for both tenants and homeowners, which lead to rapid turnover and loss of affordable housing.

Stakeholders recommended solutions:

- **Reform rent stabilization laws and improve state resources for oversight and enforcement++.**
 - Eliminate landlords' ability to use Individual Apartment Improvements (IAI), Major Capital Improvements (MCIs), preferential rents, and other tactics that harass tenants, raise rent, and destabilize units.
 - Increase HCR's resources to be able to review construction allowed under MCIs and investigate landlord claims. Have MCI increases be time limited, as landlords recoup costs in 3-4 years but rent increase lasts forever. Extend comment period available for tenants during MCIs.
 - Allow addition of people on a lease for rent stabilized units, particularly important for people with disabilities with caretakers.
 - Create a strong fee for the destabilization of an apartment.
 - Establish fair rent increases, tying them to an entity that oversees rents
- **Create a system for rent checks to be deposited and automatically show that payment was made, to prevent landlords from claiming false non-payment.**
- **Create a rent stabilization program for 1-5-unit buildings, which make up a lot of housing in certain boroughs with low-income tenants that are currently not protected++.**
- **Give HPD, DOB, HCR, and other enforcement agencies what they need in order to conduct more robust, proactive, targeted enforcement of existing codes, laws, and regulatory agreements++.**
 - Conduct proactive audits, spot checks, follow through, investigations, etc. Transfer monitoring and enforcement powers of rent stabilized building from HCR to NYC.
- **Strengthen punishment for landlord harassment, including increasing penalties for harassment against vouchers holders, and increasing repercussions with multiple violations++.**
- **Expand funding for tenant outreach and organizing, and ensure accessible and multilingual documents with plain language and quality translation++.**

- **Create a centralized source of information and hotline for housing rights and resources, and improve training of agency staff and 311 operators++.**
 - Rewrite Housing ABC's. Train 311 to have better competency to redirect tenants to specialist hotlines. Reform DOB responses to complaints on harassment.
- **Enact Fair Exchange legislation for buy-outs and create a tenant education program around their rights and negotiation++.**
- **Expand Universal Access to Counsel to enable affirmative litigation and address issues prior to eviction++.**
 - Some stakeholders felt that Universal Access to Counsel is steering funding towards responding to court cases, and away from preventative and affirmative work. Create partnerships with paralegals and advocates to support other tenant legal services outside of eviction prevention.
- **Establish a holistic model of tenant legal services and integrate with other offices addressing holistic needs like social services, children's services, criminal defense, schools, etc.**
- **Reform Housing Court process to better support tenants, including mandating apartments be put on hold and rents frozen until disputes are resolved++.**
 - It has been used more by landlords to evict tenants rather than help tenants. Need more follow up and accessible avenues for tenants to report and get support from retaliation from landlords. Expand provision of housing court attorneys to be city-wide rather than limited to certain zip-codes. Improve Housing Court cultural competency and language support services, including sign language.
- **Expand Certification of No Harassment (CONH) to be a city-wide permanent program++.**
- **Create an emergency anti-displacement plan to keep people in their neighborhoods right at the point of potential displacement ++.**
 - The City should find emergency housing in the community so that people can stay housed in their neighborhood. Someone displaced from Bushwick should not have to go to the Bronx for shelter. Once someone is displaced from their neighborhood, it is challenging to return.
- **Expand existing preservation programs and support for non-profits to maintain buildings.**
- **Create a new income-based tax to raise funds to support housing emergencies, reasonable accommodations, and rental subsidies for those with chronic illnesses, etc.**

Homeowner Protections

- **Implement a City-wide Cease and Desist Zone and create a campaign educating owners on buy-outs and their rights++.**
 - Secretary of State has made it really difficult to pursue this, but we can do this in NYC to prevent the impact of buy-out harassment for both tenants and homeowners. There could be a software app or tool that people could use to properly calculate a reasonable buyout and build in other factors.
- **Continue to support free foreclosure prevention programs and legal services for homeowners++.**
 - State funded services are about to be lost for foreclosure prevention.

- **Enable income-based payment plans for homeowners with water, sewer, and property tax arrears.**
 - Provide income-based payment plans and ensure that the property tax system is designed to discourage displacement.
- **Promote education and resources for seniors and their families to do estate planning.**
 - Improve information and support for families to properly manage homes after owners pass away.
- **Create legislation that would enable people to get their property back in cases of deed fraud, deed theft, zombie homes, and properties in probate, in neighborhoods with high rates of foreclosure.**
- **Reform Tax Lien Sale Class 1 to maintain affordability and connect with Community Land Trusts or non-profits to purchase.**

Issue 5b: Affordability Duration

Stakeholders expressed concern that time-limited regulatory agreements between the City and developers can lead regulated affordable housing to become unaffordable at the end of a contractual period. They also noted that buildings will likely lose affordability in the neighborhoods that are gentrifying or have strong markets, where affordability is needed to prevent displacement, and new affordable housing is much less economically viable.

Stakeholders' recommended solutions:

- **Expand more grass roots, community-driven and community-owned models of development and investments for permanent affordability++.**
 - Support CBO's to acquire funding for community spaces. Expand Community Land Trusts. This would maximize public dollars in the long run and establish displacement protections.
- **Eliminate time-limited affordability agreements and change term sheets to require permanent affordability.**
- **Implement a Right of First Refusal in all affordable developments before resale.**
 - LIHTC has a provision that allows for the right of first refusal. In some parts of the country, the right of first refusal is for tenants, enabling a rent to own format.
- **Require developers to create a tenant plan for when regulatory agreements expire without extension.**
- **Expand preservation tax credits to encourage building owners in high markets to keep units affordable when they are about to expire.**

Issue 5c: High-demand housing market

Stakeholders said that a strong local and regional economy, which attracts more residents, tourists, and investments to NYC, has increased the demand for housing and has driven up the cost of living for renters.

Stakeholders' suggested edits:

- **Emphasize that market changes don't happen in a vacuum, and that the City of New York plays a role in shaping the market through zoning changes, incentives for businesses, and other incentives that can creating displacement effects for low-income communities of color.**

Stakeholders recommended:

- **Create a requirement for 1:1 replacement in loss of rent stabilized and other naturally occurring affordable housing++.**
 - At minimum, there should be enforcement of mitigation of loss units identified via CEQR.
- **Improve coordination between City and region to incentivize people who are interested to move upstate for jobs, etc.**
 - Parts of NYS face challenges with housing vacancy because there is not enough demand and have affordable housing, including homeownership opportunities, for low income families.
- **Reform regulations of AirBnB and other home share programs.**
 - Some stakeholders felt a ban on AirBnB is necessary because we have a housing crisis. But others noted that a ban doesn't work because enforcement is limited. Others noted AirBnB is helpful for families who have a spare bedroom and may need help paying their rent or mortgage. Others wanted to see a licensing system, as other cities have done, which would allow the City to better collect information and enforce owners. Create exceptions for home share rules that enable tenants who rely on home shares like AirBnB to rent extra rooms to help pay their rent. Some landlords are monitoring home share websites and using it to kick tenants out.
- **Implement housing vacancy tax to disincentivize harboring of vacant units in the market++.**
- **Implement a good neighbor tax credit or tax abatement for unregulated housing to preserve affordability for low-income tenants++.**
 - Landlords would receive tax abatements or exemptions if they keep rent at a certain level and/or if they rent to low-income tenants, esp. seniors, with a cap on rent increase (rent stabilization light).
- **Implement a pied-a-terre tax and use revenue to support new construction of affordable homeownership++.**
- **Support anti-speculation / flip tax++.**
 - Speculation creates rapid appreciation of properties and increases the prices of homes in neighborhoods that were previously affordable. A New York City flip tax that would deter property speculation and flipping by creating an additional 15 percent tax on properties sold and resold within one year, and a 10 percent tax on properties sold and resold between one and two years.
- **Support property tax reforms to be more aligned with fair market housing value rather than income-generation.**
 - Class 1 properties need a cap. When income-generating buildings are taxed at a high rate, it translates to the tenant.

Contributing Factor #6: Discrimination and the enforcement of fair housing laws

Issue 6a: Persistent discrimination

Stakeholders said that private discrimination in the housing industry in New York City can reinforce segregation, but it is challenging to capture. There are persistent forms of discrimination by brokers, realtors, lenders, co-op boards, and landlords rooted in stigmas against different groups or unwillingness to make accessibility accommodations. For example, protected class members are led to non-existent phone numbers or waiting lists, shown housing options of different quality or location, or provided higher loan rates. Stakeholders also noted that many victims are unlikely to file a report due to distrust of government and skepticism about the efficacy of a complaint.

Stakeholders' suggested edits:

- Add that victims most often do not know they are being discriminated against.
- Add that staff helping homeless New Yorkers looking for housing often lack basic understanding of housing discrimination, especially source of income, and knowledge of how to report it.

Stakeholders' recommended solutions:

- **Increase resources and promote coordination between CCHR and HRA's Source of Income (SOI) units to conduct more proactive tests and process claims faster++.**
 - Currently, both units are under capacity with hundreds of daily complaints, and claims can sometimes take a year, while an apartment can be off the market in a week. Increase publicity of HRA's new SOI unit and share contact information. Create an internal and automatic referral process so units can better coordinate with each other when capacity may be limited.
- **Create mandatory source of income discrimination training and reporting tool for DSS-contracted housing specialists and case managers.**
 - Reporting should go directly to CCHR and HRA's SOI units. This can help reduce burden of New Yorkers in instability to report discrimination and improve efficiencies in identifying cases and collecting preliminary evidence.
- **Expand CCHR's outreach and training of local organizations to provide awareness about fair housing rights and services; establish neighborhood-based fair housing centers++.**
 - Help tenants understand what actions might be discrimination, who to call to complain, the process to file a complaint, documents needed, etc.
- **Reform the co-op board approval process to require disclosures and fair housing training; create a standardized application with clear criteria++.**
 - Alternatively, require the registration of decision-making criteria for co-ops, who currently do not need to justify why they have chosen or rejected someone. Vancouver BC is implementing similar laws to track who buys condos.
- **Create and centralize educational materials on housing rights, processes, and responsibilities for people with disabilities, including a hotline for support and questions++.**
 - Currently, there is not a web page on housing resources for people with disabilities. Provide greater clarity on what is a violation of the law, what accommodations are appropriate, what are proper and legal ways to respond to tenants with disabilities, and how to make exceptions and accommodations for people with disabilities.

- **Implement mandatory trainings for developers and architects on making their buildings accessible; conduct vigorous inspection and review to ensure compliance.**
 - Developers disregard accessibility requirements, especially in assisted living facilities, where there is a policy of not accepting wheelchair users.
- **Establish trainings for landlords and leasing agents on fair housing responsibilities, including mediation tactics, and grade landlords based on fair housing competency++.**
 - Many small landlords are exempt from Federal-level discrimination regulations that impact tenants. Homeowner-landlords would benefit from learning about fair housing laws, their responsibilities as landlords, ways to mediate issues with tenants, trainings that cover maintaining tenants, collecting rents, budgeting for repairs, and building code compliance.
 - Create a consumer label such as a restaurant grade to grade landlords' fair housing competency. Data collection is a part of this.
- **Require landlords to support relocation of tenants with disabilities if they do not have options for modification or other units within their properties.**
 - Conduct trainings and create support for landlords to help PWD.
- **Task the NYS Division of Licensing Services to conduct license investigations without having the State Human Rights Commission involved, and hold real estate brokers accountable to fair housing compliance.**
 - Currently, the Division of Licensing Services cannot investigate discrimination by brokers unless 1) you have a court order or 2) the case has been investigated by the State Human Rights Commission. This policy should be changed so that if the Division of Licensing Services or a testing and enforcement agency receives a discrimination complaint against a licensee, they should have to investigate it.
- **Require landlords to publish minimum eligibility requirements and standard rents, and also give written reason to why tenants were denied to view or rent an apartment.**
 - Additionally, require all real estate brokers to include in tenants' documents their rights and examples of discrimination.
- **Increase fines for discrimination cases and track landlords with discrimination histories, particularly against voucher holders++.**
 - Make it very expensive for landlords to discriminate. Create a stronger fine system so it is not something the tenant has to go to court over (like EBC violations), as tenants do not have the time or resources for this, especially if they are currently seeking housing. Track landlords who are discriminating against tenants with vouchers and penalize discrimination.
- **Increase CCHR's capacity to conduct testing and enforcement of fair housing, including testing lending discrimination with banks, room shares and other online listings, and more ++.**
 - Establish a more inter-agency coordinated effort on the City level to carry out fair housing programming and enforcement.
- **Provide funding for non-profits conducting testing and outreach on fair housing and fair lending ++.**
 - Currently, there is no funding allocated by the City and State for fair housing work.

- Increase transparency of the affordable housing lotteries and publish demographic and geographic origin data on recipients, who is denied, and why++.
- Conduct testing and collect more data on LGBTQ population and their experiences with housing discrimination.
- Advocate for New York State to enact an AFFH Rule for municipalities that mirrors HUD's requirements.
- Create better system of oversight over the leasing of privately owned units to better protect tenants from discrimination.
 - Stakeholder suggested creating a centralized office or system for private rental market selection process for tenants and landlords.

Issue 6b: Gaps in fair housing protections

Stakeholders noted the lack of fair housing protections from discrimination based on justice-involved history, low or lack of credit history, source of income (at the state level), and other characteristics that produce disparate racial outcomes and perpetuate disproportionate housing needs for people of color.

Stakeholders' suggested edit:

- Note that landlords target prospective tenants whose names sound African American or Latino for background checks.
- Add that credit history can be especially challenging for immigrants, DV survivors, people with disabilities, and other groups.
- Add that history of Housing Court, regardless of if it were tenant-initiated, is being used to discriminate against tenants. Tenants' awareness of this list also disincentivizes them from reporting harassment, discrimination, and taking legal action against a bad landlord.

Stakeholders' recommended solutions:

- **Recognize justice-involvement as a protected class in the City and State Human Rights Laws and U.S. Fair Housing Act, and enact NYC legislation to limit landlord use of background checks++.**
 - Eliminate background checks as part of rental applicant screening for private landlords and create a public education campaign about the fact that there is no research to support a correlation between arrests, conviction, and being a good tenant. Arrest may not have even led to conviction, but still impact people's ability to get housing. Conduct proactive outreach and education to landlords that there is no correlation between types of crimes and bad tenancy
- **Address the "tenant blacklist" and outlaw its use in the background check and lease up process++.**
- **Advocate for a stronger source of income law on the City and State Level; eliminate exemptions++.**
 - Landlords of 1-5 unit buildings can deny a tenant with a voucher. Additionally, there are no source of income protections at the State level.
- **Create protections for people with low credit score or no credit history in private housing++.**
 - Require an appeal process for getting rejected for a unit in the private market, like HPD.
- **Reform the Sex Offender Registration Act (SORA) restrictions to reconsider level of offense, clarify interpretation of restrictions, and make exceptions for New York City.**

- The sex offender registry system is not-evidence based and does not help people but rather isolates people and increases the chances of recidivism by blocking people from accessing their support networks. Parole districts interpret the law differently (e.g. what the 1,000 feet restriction from certain places mean).
- **Reform Human Rights Law to mandate landlords to offer renewal to tenants with disabilities in non-regulated apartments.**
- **Reform NYS disability rights laws to be at least as strong as NYC and invest in enforcement**
 - Sometimes when CCHR does not have capacity, providers will send constituents to the state, but they can only protect so far as the state law.
- **Advocate for CCHR to become substantially equivalent to federal law, which could enable more funding and efficiencies in enforcement.**
 - CCHR has been more effective than the State agency. The State Law limits remedy because they do not hold bad actors accountable. NYC and NYS Human Rights Law could be more expansive and vigorous in terms of its enforcement abilities. HUD can work with any State or local community to help them be substantially equivalent.

Contributing Factor #7: Admissions and occupancy restrictions in publicly-supported housing

Issue 7a: Availability of affordable, integrated living options for populations with special needs

Stakeholders reported that there is a lack of affordable, integrated, and fully accessible housing in a range of unit sizes for people with disabilities and/or those who need supportive services. Stakeholders also discussed limited set-asides for people with disabilities and that modified units often end up being filled by tenants who do not need the modifications. They also described that modified units are sometimes not truly accessible (e.g., challenges with wheelchair turning radius). Finally, stakeholders said that units for people with disabilities and seniors are usually studios or 1-BRs, which, combined with rules around relations between tenants, can prevent living with family or caretakers.

Stakeholders' suggested edits:

- Add the challenge that the universe of accessible units is not known, and some units may not be inhabited by someone who most needs the features. Some marketing agents choose the applicant 'least' disabled (e.g., preference for cane versus wheelchair).
- Emphasize the challenges for people with disabilities to transition out of institutional, segregated settings.
- Note that disability set-asides in affordable housing are often not met because the income threshold is too high. At the same time, set asides are not enough for the number of people with disabilities in need of housing in integrated settings.
- Include challenges around modifying existing housing to be accessible to accommodate an aging population, and the discretionary interpretation of reasonable accommodation laws.
- Add language about challenges of transgender folks, and other identities without supportive housing needs.

Stakeholders' recommended solutions:

- **Assess accessible unit demand and supply and create more robust centralized tracking of available units city-wide++.**
 - Need to understand the universe of accessible units (quantity, types, etc.) across different housing types (private and public). Begin to track what's in the pipeline, how many people need these units, how many are inappropriately housed currently, and where they are. Change the 7% mandate and HNY targets to meet the demand found by the analysis.
- **Monitor housing set-asides to ensure they are being rented to people with disabilities as intended++.**
 - Need audit and enforcement to ensure people who need the units are getting them, even at rental, and ensure developers are complying with 5% and 2% requirements.
- **Increase set-aside or create new term sheet with higher set-aside for people with disabilities (without homeless or NYNY status), giving preference to those transitioning out of nursing homes++.**
 - Nursing homes are more expensive than shelter or housing and would be a big cost savings.
- **Create flexibility in income thresholds for the housing lottery for people with disabilities.**
 - Supply of accessible apartments is so limited, but people get denied because they are \$100 over the limit—can they pay extra or add it to their rent, rather than renting it to someone without the accessibility needs (via an MOPD waiver).

- **Create subsidies or set-asides for individuals with mental health disorders that do not need supportive housing.**
 - There is a spectrum of mental health disorders, and some individuals turn down supportive housing options because it is too restrictive. Some people are living with chronic issues with only acute episodes (e.g., bipolarity), but do not need to be monitored for medication and are stable and employable, but still need help financially to live on their own.
- **Develop supportive housing and set-asides for people with cognitive disabilities, who are also aging and in need of housing.**
- **Change admissions criteria for supportive housing to help residents aging in place have a live-in caregiver.**
- **Increase number of NED (non-elderly disabled) Section 8 vouchers and expand rental assistance options for the disability community to live independently++.**
 - Currently only 100 at HPD and 1000 at NYCHA. Need more to increase the housing options for young people with disabilities. DRIE is limited to only if you live in a rent stabilized building. Perhaps partial funding through Medicaid since the City pays into it.
- **Expand set-asides and supportive housing for transgender individuals, youth aging out of foster care, grandparents raising grandchildren, veterans, and other special populations++.**
- **Allow DV shelters the same access to homeless set-asides and vouchers as DHS shelters.**
- **Create a new Domestic Voucher program to replace LINC III.**
- **Address housing accommodations for caregivers in public housing++.**
 - NYCHA requires care-givers to be on the lease, but lose succession rights if they are there for fewer than 12 months. This unfairly discriminates against people who may have given up their housing to care for an ailing family member. Additionally, create overcrowding exemptions for live-in caretakers, as there are few opportunities for people to move into a larger space.
- **Enable responsiveness to changing family sizes in NYCHA and other types of affordable housing that may need conversions.**
- **Change admissions requirements for senior housing to enable care-givers or partners to move in, even if they are not 62 years of age.**
- **Expand HomeFix program to include financing accessibility modifications ++.**
 - It is challenging to find financing for more than \$10,000 to modify units, making it hard to age in place.
- **Conduct a comprehensive city-wide study of people who are aging in place.**
- **Require that shelters be ADA compliant, including refrigerators for medications.**

Issue 7b: Eligibility criteria that can limit economic mobility

Stakeholders noted that eligibility criteria of housing programs can limit economic mobility for populations that rely on public support for housing – including but not limited to people with disabilities, voucher holders, and NYCHA residents. Stakeholders said that these populations often have to make difficult tradeoffs between keeping their housing support and accessing economic opportunity (e.g., a new job or higher income). Stakeholders also noted that sometimes this is driven by misinformation about what happens to rents/payments after a change in income.

Stakeholders' suggested edits:

- Include how all City vouchers have a cliff because they are tied to public assistance, which forces you to suddenly lose all your support once you become over income.
- Add that Social Security Disability (SSDI)'s income eligibility is low and has no gradual deductions, unlike Supplemental Security Income (SSI), which becomes a disincentive to work or gain any additional income or else lose all your benefits.
- Add that the confusing method of recording income levels often ends up mismarking applicants' eligibility and status.
- Add that how affordable housing is defined (one third of income) can leave lowest income families with very little disposable income to pay for basic goods and services that have high costs in NYC, which can create barriers to overcoming poverty and continued concentration of poverty. It is particularly challenging for people with disabilities because of additional costs related to medical and transportation expenses.

Stakeholders' recommended solutions:

- **Advocate with the federal government to change the definition of affordable housing (30% of income rent calculation) to be a progressive model that helps lowest income New Yorkers climb out of poverty ++.**
 - Have low income earners pay less than one third of income, or calculate by net income after additional expenses such as medical, childcare, and transportation expenses, to enable more disposable income.
- **Advocate for federal government to reform Section 8 and SSDI income thresholds and payment calculations to have gradual deductions and use net income++.**
 - Use net income after housing costs to calculate payment. If this were applied for voucher calculations, people with disabilities could go to work and earn enough to get into the SSI range or the \$25k range and be eligible for Housing Connect units.
- **Reform City voucher and rental assistance programs to be more incentive-based to support people advancing economically++.**
 - Could be temporary to cover while someone is in school and getting a job, with a gradual step-down. DRIE income limit (\$50K) should not be the same as SCRIE, as people are often younger and can/want to work.
- **Expand NYCHA Earn Income Disallowance (EID) and revisit NYCHA's rent increase policies to support working residents to be able to build wealth++.**
 - Also need to consider income to expense ratio.
- **Revisit NYCHA rent increase policies to enable even more gradual incentives, and conduct clear education and communication on how rent increases happen++.**

- NYCHA's current rent increases with income are gradual, but this is not widely known by residents. Some felt that there could be even more gradual incentives and wealth-building opportunities.
- **Enforce and expand NYCHA's deduction of medical expenses for people with disabilities.**
 - Currently, NYCHA has a \$400 stipend for people with disabilities annually, but this is not enough. NYCHA is also supposed to deduct medical expenses for people with disabilities (up to \$2,000) before calculating rent.
- **Revisit NYCHA tenant screening and orientation to ensure that new tenants who may have special needs are connected to supportive services.**
 - Some residents felt that the burden of caring for new tenants with disabilities is placed on other residents in the building, who already face compounding challenges.

Issue 7c: Administrative barriers

Stakeholders said that burdensome administrative requirements create barriers for members of protected classes to accessing affordable housing. For example, requirements for notarized copies or other actions that require multiple trips and appointments can be challenging for people with disabilities, the elderly, or people with inflexible work schedules. Legal forms of ID can be challenging for institutionalized populations.

Stakeholders' suggested edits:

- Add a lack of language accessibility and clarity on eligibility for immigrants for public assistance programs.
- Include the incongruence between City/State/Federal laws and even between City programs and agencies, which create confusion for both applicants and caseworkers meant to help people navigate the systems. Paperwork for multiple benefits can also be complicated. If a building, for example, has multiple subsidy sources, tenants have to recertify for each one.
- Note that the outdated technology of the City is an issue.
- Add the fact that limited coordination across health groups (that provide care and housing subsidies), housing groups (who build the units), and the non-profits (that support people with disabilities) can create inefficiencies and more challenges for people with disabilities to get housing.
- Note that ID is also challenging for immigrants, people with disabilities transitioning out of institutions, as well as Trans populations if their gender does not match. It can take 4 months to get an ID and not enough time for the interview. Currently, IDNYC is inconsistently accepted.

Stakeholders' recommended solutions:

- **Expand Individualized Case Management to help people move out of institutions.**
 - Current program exists for people with developmental disabilities: Housing Navigators (run by NY Alliance for Inclusion and Innovation) with A-to-Z services, beginning with planning and into the transition to more independent housing options, considering whether they should work and what supports they need.
- **Convene a task force between HPD, DOH, MOPD, HRA, Office of Crime Victims, and service providers about health and housing for PWD transitioning out of nursing homes.**
 - The Medicaid Redesign team is a good example – they created an offshoot program to create more realistic and targeted housing options for people with disabilities.

- **Eliminate or Reform NHTD (Nursing Home Transition and Diversion) vouchers and create a comprehensive approach to moving people out of institutional settings++.**
 - Need a new high profile, well-funded program. Many stakeholders felt that the current NHTD does not work, has limited subsidies, and cherry pick the most able individuals. Stakeholders also flagged administrative barriers, like length of time to get funding (can be a year) and the need to show a lease before getting approved for funding (you cannot get a lease without the funding).
- **Advocate for using Medicaid to pay for housing support for people with disabilities to live independently**
 - HHS secretary noted that this may be soon expanded into Medicaid-covered service, and NYC should use Medicaid to pay for housing.
- **Create a streamlined, centralized web system where you can put in your income, statuses, and other important info to be able to search and filter affordable housing and/or benefits that you might qualify for++.**
 - Upgrading the City's technological infrastructure could reduce burden on Housing Ambassadors, so people can do it on their own. Connect people to housing options they might qualify for because of intersecting identities and be able to prioritize tenants based on greatest intersecting needs.
 - Currently, each category has its own program, application system, agency, and is very bureaucratic.
- **Streamline benefits and create a single platform for building management, so that tenants can update their information to simplify and streamline recertification.**
 - When multiple subsidies and programs are in place for a building or apartment, tenants have to recertify and re-do processes multiple times.
- **Change City voucher eligibility criteria to more proactive house those living in the streets, undergoing eviction, or staying with family members++.**
 - Some populations are afraid to enter the shelter system (due to language barriers, accessibility barriers, or safety concerns), and couch surf with relatives, but then are not counted as homeless.
- **Expand City government service office hours to evening and weekends to accommodate people who work full time jobs to access the benefits and support they might need.**
- **Train agencies and service providers to make ADA reasonable accommodations and language access more standardized; intentionally get input from disability communities++.**
 - Improve accessibility of forms and competency of staff. Basics like size-18 font, no italics or underlining, flushed left; plain language 4th or 5th grade reading level, agendas in advance; sign language interpreter; noting accessible entrances, etc.
- **Revamp marketing guidelines to expand legal forms of ID, simplify the referral and application process to make less burdensome for people in crisis, and have more agency oversight++.**
- **Test, reform, and establish a more refined due process for people with disabilities in the housing lottery process; improve oversight of marketing and lease up.**
 - Require notice and reasoning for waitlist and option to appeal; create special rules and exceptions in documents required for PWD (e.g., a notarized letter from the nursing home and other verification to replace ID if necessary).

- **More support and funding for Housing Ambassadors, and more proactive outreach across a wide geography and for specific populations++.**
 - Enable expansion of roles to include assisting applicants with their applications who have been denied to appeal rejections and provide more individualized follow up and planning for housing stability. Ambassadors are needed to support unique populations, such as veterans, DV survivors, LGBTQ, and more.
- **Establish and enforce rule that says landlords cannot deny an applicant with a disability because they couldn't come to see the site and sign – enable letters to be a proxy for ID and in-person interview.**
- **Expand housing options for people with a range of developmental disabilities; advocate for expansion and formalization of the Office of People with Developmental Disabilities (OPWDD)'s definition of “developmental disability.”**
- **Create training and guidelines for marketing agents and health care providers on mental health competencies to support applicants and their rights/responsibilities.**
 - Sometimes health care providers can get in the way of a person with disabilities to obtain housing (e.g., a hospital refusing medication or agency having a different opinion of the extent of someone's disability because they don't fit the image of who they had in mind as someone who is bipolar or other invisible disability).

Issue 7d: Barriers for justice-involved populations

Stakeholders expressed concern that there are significant barriers to living in publicly-supported housing for people who have been involved in the criminal justice system.

Stakeholders' suggested edits:

- Add that even well-intended organizations discourage applicants from applying.
- Add that NYCHA permanent exclusion policy can leave people stuck in homeless shelters if their support networks are all in public housing. It also does not give an opportunity for family members to be care givers to the elderly.

Stakeholders' recommended solutions:

- **Eliminate or reform NYCHA Permanent Exclusion Policy++.**
 - Make exceptions for care-givers of elderly family members in NYCHA; decrease the severity of conducts that triggers a potential termination of tenancy of an individual; end pre-conviction decisions, as arrests can rely on unsubstantiated allegations; require investigators to properly identify themselves and inspect with dignity for residents; expand outreach and education to NYCHA families about the application to lift permanent exclusion. Some stakeholders wanted to eliminate the policy, while others sought reforms.
- **Expand reentry pilot to increase access to NYCHA for justice-involved people and their family members++.**
 - Work with applicants to expunge history while they are on the NYCHA waitlist. Need more restorative approaches. Have a more interactive process to review the case that may involve the community.

- **Create incentives for landlords to rent to tenants with a conviction history, whether tax incentive, or up-front payment of voucher, etc.**

- **Reform HPD Marketing Guidelines to include clearer guidelines and less discretion from the provider on the use of background checks for eligibility++. Spot check and enforce.**
 - Currently, the guide gives discretion to providers, resulting in varying policies that ultimately discriminate against those with records of arrest, despite non-conviction, completed time, or successful rehabilitation.

Contributing Factor #8: The availability, type, accessibility, and reliability of public transportation

Issue 8a: Inequitable rapid transit access

Despite NYC and the region's extensive rapid transit network, stakeholders said that there remain large inequities in neighborhoods' access to reliable rapid transit to important job centers and services. Residents who live far from rapid transit face challenges with multi-modal transit and connectivity, as well as challenges in late-night and early-morning transit options with regard to safety and frequency. Lack of reliable transit in suburbs that have quality schools and environments can also force people to live in the city if you cannot afford a car. Stakeholders also said that the growing use of for-hire vehicles leads to congestion, which impacts the speed and reliability of buses, which predominantly serve people of color.

Stakeholders' suggested edits:

- Add that work on Fast Forward happens on nights and weekends, which affects low-income people working late hours.
- Add concerns about the city-wide limits being placed on Uber/Lyft, which stakeholders fear could negatively impact outer borough low-income communities who rely on these services because of the limited service of yellow and green cabs in those areas.
- Emphasize inter-borough travel challenges. The subway is designed to get people in and out of Manhattan, but there are growing job centers in outer-boroughs.
- Add "where there may be affordable housing" after the word 'suburbs' in the second to last sentence.

Stakeholders' recommended strategies:

- **Conduct comprehensive planning around housing, economic development, and transit; upzone transit corridors to enable housing growth and job connectivity++.**
 - Promote more interagency coordination to conduct Transit-Oriented Development (TOD). Promote economic development and jobs in outer boroughs with good transit access. Prioritize transit investment in historically disinvested neighborhoods.
- **Extend transit into rapid-transit-desert areas, paired with affordable housing development and protections++.**
 - Sometimes these areas without rapid transit are poor neighborhoods that are not served, but sometimes they are higher income areas that are not served, which makes it hard for low-income people to consider moving there. Limited public transit may also limit job growth in those areas.
- **Implement the Tri-boro Proposal to expand rapid transit on underused freight lines between Brooklyn, Queens, Bronx, and potentially SI.**
 - It is cost effective since the infrastructure already exists. It would service neighborhoods that are majority low-income communities of color and some low-density areas that do not have access to rapid transit. It connects multiple job centers where low-income people work, and has environmental justice benefits.
- **Apply an equity framework and establish improved services and connections in areas not easily served by subways for low-income individuals++.**
 - Prioritize capital funding to services for low-income communities to decrease disparities. Late night service on buses, for example, is expensive but serves low income workers. Reinstate buses or

shuttles in low ridership areas. Explore costs of subsidizing low-income workers with late night trips home via for-hire vehicles rather than running empty buses. Promote more equitable distribution of transportation alternatives such as bike lanes.

- **Expand and improve bus service for reliability++.**
 - Improve management and enforcement of street space. Add more bus lanes with dividers. Avoid eliminating routes because of low ridership—those routes often had people with disabilities who relied on those buses. Ridership may have been low because of speed issues, not a lack of demand/need. Prioritize cross-borough connections in areas far from subway service.
- **Implement Congestion Pricing and other initiatives to reduce traffic, which can affect bus efficiencies++.**
 - People who drive overwhelmingly have higher incomes.
- **Make the ferry service more accessible and easier to use, with connectivity to subway**
- **Improve bike safety strategies and implement universal and free bike share**
 - Biking can be key to connecting to other transit. Make options available for people with disabilities.
- **Reduce restrictions on E-bikes and expand bike share to serve low-income workers who use e-bikes for their work to use for commutes.**

Issue 8b: Limited universal accessibility features

Stakeholders expressed concern that the limited accessibility of subway stations, including its elevators, platforms, and car designs, present difficulties for those with wheelchairs or strollers. These difficulties are particularly acute in outer borough areas where the concentration of people with disabilities is highest and travel distances to job centers and governmental offices are longest. Stakeholders also said that wayfinding in public transit is not friendly for those with visual, auditory, multi-lingual, and multi-sensory communication needs. Additionally, there are still many bus stops that are accessed by challenging sidewalks and that have poor shade, lighting, and no seating options.

Stakeholders' suggested edit: emphasize the aging population and future needs.

Stakeholders' recommended solutions:

- **Redesign streets and sidewalks for universal access and less conflict amongst users; create a plan for integrated mobility strategies for neighborhoods++.**
 - Need better curb cuts and other sidewalk accessibility features. May need to take space from cars and parking.
- **Engage people with disabilities in the development of new transit options and incorporate smart designs++**
 - Newly renovated subways with tile flooring can be slippery, and new design of buses can be hard to get in/out of. Bright lights can be really challenging for some people with visual difficulties. Some of the new buses have very bright lights for safety reasons, but this can be challenging.
- **Ensure buses and subways are accessible for people with auditory, visual, and ambulatory disabilities, particularly upcoming stops, emergency announcements, and re-routes++.**

- Need clear auditory announcements with visual communication, back up methods to get information in case one method fails, and considerations for people with overlapping and multiple disabilities. Need better edge markings, reduced gaps between the platform and car, improved elevator repairs, and multilingual accessibility accommodations.
- **Aim to make all stations accessible.**
- **Leverage private philanthropic dollars to implement accessibility for all initiatives.**

Issue 8c: Limited affordable and reliable accessible transit options

Stakeholders mentioned that there are limited affordable, reliable, accessible transportation options for the elderly and people with disabilities. Access-a-Ride can be unreliable, have long waiting times, and require booking far in advance. Additionally, for-hire vehicles, dollar vans, and car- and bike-share services are often not compliant with ADA-accessibility rules.

Stakeholders' recommended solutions:

- **Expand Access-A-Ride E-Hail Pilot to create a more efficient experience.**
- **Require minimum number of accessible cars for ridesharing and cabs, and create reduced fares for seniors and people with disabilities.**
 - Create an accessibility feature to fill the gap between market costs and what people can afford.

Contributing Factor #9: Location of proficient schools and school assignment policies

Issue 9a: School admissions and enrollment policies

Stakeholders said that New York City's complicated mix of elementary school residency preferences (i.e. school zones) and school-choice policies reinforce residential segregation. Families with more financial resources—who are disproportionately white—can pay for housing in school zones with higher-performing schools. Families who live in school zones with lower performing schools face complicated decisions, and certain families—including immigrants and parents with limited English proficiency—may struggle to navigate the system. Additionally, as students age, middle- and high-school assignment policies that use test scores, grades, and attendance records also reinforce segregation within schools and disparities in access to opportunity. Stakeholders noted that there is a lack of willingness by some parents to have conversations about the racial impact of these policies.

Stakeholders' suggested edits:

- Note importance of differentiating between elementary, middle, and high school and the different challenges faced at each level.
- Add that since the No Child Left Behind policies, test scores have become how families understand school quality, which has influenced today's segregated living patterns and inequitable schools. There are many quality schools by other measures that parents do not send their kids to because they believe high test scores indicate quality schools.
- Note that while there are three districts with current School Diversity and Integration Plans, there are additional districts interested in creating their own plans, but face challenges with overcoming White and wealthy parents that take on segregationist positions. Some districts have no integration advocates and will not voluntarily change without a mandate.
- Add that when integration happens, people of color face interpersonal racism from White families.

Stakeholders' recommended solutions:

- **Establish HPD policy on how new affordable housing connects with school assignments++.**
 - Develop limited equity co-ops and affordable housing for families in areas with high quality school zones. Give lottery preference to families with school-age children for housing in high quality school zones as units become available. Create opportunities for homeownership or affordable housing near schools. Create incentives to house teachers, as it is beneficial to have teachers who are members of their community.
- **Eliminate off-site inclusionary housing provisions, which can make a difference in school district access.**
- **Change narrative of what makes a “good school” (especially elementary and middle) and ensure there are high quality schools in each school district++.**
 - A new narrative and measurement on quality needs to be established, one based on socio-emotional and socio-cultural skills; civics. Create partnership with the real estate industry, local residents, and community-based organizations to understand this.
- **Require all middle schools city-wide to get rid of screening and promote diversity in admissions through a combined top-down, bottom-up approach++.**
 - Give each district the opportunity to create their own alternative to screening and a diversity plan. Top-down/bottom-up approach helps to make it more of a collaborative process and limit opposition

- Conduct a campaign to educate students, parents, and Community Education Councils (CEC)'s to conduct racial justice, anti-oppression trainings to enable conversations about segregation.
- **Study the racial impact of exams on specialized high schools**
- **Remove elementary, middle, and high school residential-based school zones++**
- **Identify districts with high rates of segregation and mandate intentional plans with community engagement to promote integration++**
- **In gentrifying neighborhoods where school enrollment has decreased, consider consolidating schools and repurposing school buildings into (mixed-use) affordable housing.**
 - In Bed Stuy and Downtown Brooklyn, for example, as affordability shifts and families without kids move-in, it changes what the schools look like—leading to under-enrollment. Create stakeholder groups that look at the impacts of under-enrolled schools or school districts. Conduct school planning in partnership with the community so people can problem solve together.

Issue 9b: Accessibility of school facilities and availability of programs

Stakeholders reported that schools that are fully accessible for children with physical disabilities are limited, as are those that offer special needs services to children with other disabilities. This in turn forces children with disabilities to attend schools that may not be near their homes. Limited building accessibility not only impacts students, but also parents and teachers with disabilities.

Stakeholders' recommended solutions:

- **Prioritize funding to create physical accessibility modifications for schools to accommodate students, teachers, and parents with disabilities.**
- **Expand investments in afterschool programming for youth with disabilities.**
- **Expand Community Schools and strategies that address the whole child.**



where
we live
nyc FAIR HOUSING TOGETHER

FINALIZE PHASE BRIEFING

Fair Housing Stakeholder Group

May 21, 2018

key terminology

- **Issue:** a problem that should be addressed
- **Goal:** a broad primary outcome to address a set of issues
- **Strategy:** an approach you take to achieve the goal
- **Action:** a specific step you take towards implementing a strategy

draft goals

1. Combat persistent, complex discrimination with expanded resources and protections
2. Facilitate more equitable housing development in NYC and the region
3. Preserve affordable housing and prevent the displacement of long-standing residents
4. Enable more effective use of rental assistance benefits in NYC and the region, especially amenity-rich areas
5. Create more independent and integrated living options for people with disabilities
6. Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Goal 1: Combat persistent, complex discrimination with expanded resources and protections

Issues:

- Persistent discrimination, both overt and covert
- Gaps in local and regional fair housing protections for economic characteristics and criminal justice involvement

Goal 1: Combat persistent, complex discrimination with expanded resources and protections

Strategies:

1. Strengthen NYC's fair housing enforcement
2. Expand NYC's fair housing protections

Goal 1: Combat persistent, complex discrimination with expanded resources and protections

Strategies:

1. Strengthen NYC's fair housing enforcement
2. Expand NYC's fair housing protections

Actions related to:

- A. Paired testing investigations of rentals/sales, banks, and brokers
- B. Discrimination complaints, reasonable accommodation requests, and accessibility requirements
- C. Discrimination by co-op and condo associations

Goal 1: Combat persistent, complex discrimination with expanded resources and protections

Strategies:

1. Strengthen NYC's fair housing enforcement
2. **Expand NYC's fair housing protections**

Actions related to:

- A. Criminal justice involvement
- B. Source of income
- C. Barriers related to credit checks, broker fees, security deposits, and other costs

Goal 2: Facilitate more equitable housing development in NYC and the region

Issues:

- Limited availability of housing severely limits housing choice, particularly for people of color and people with disabilities
- Challenges associated with building affordable housing in high-cost areas
- Opposition to growth in amenity-rich neighborhoods
- Fear that investments in historically under-resourced neighborhoods could lead to gentrification

Goal 2: Facilitate more equitable housing development in NYC and the region

Strategies:

1. Expand coordination of housing policy and planning in the city and region
2. Ensure that land use processes effectively balance citywide needs and local perspectives
3. Increase housing opportunities, particularly for low-income NYers, in amenity-rich neighborhoods
4. Open publicly-supported housing to more NYers

Goal 2: Facilitate more equitable housing development in NYC and the region

Strategies:

1. **Expand coordination of housing policy and planning in the city and region**
2. Ensure that land use processes effectively balance citywide needs and local perspectives
3. Increase housing opportunities, particularly for low-income NYers, in amenity-rich neighborhoods
4. Open publicly-supported housing to more NYers

Actions related to:

- A. Regional housing agenda and working group
- B. Tools to evaluate housing investments
- C. Tracking and reporting on housing growth by neighborhood/demographics
- D. Expand HVS to address fair housing data gaps

Goal 2: Facilitate more equitable housing development in NYC and the region

Strategies:

1. Expand coordination of housing policy and planning in the city and region
2. **Ensure that land use processes effectively balance citywide needs and local perspectives**
3. Increase housing opportunities, particularly for low-income NYers, in amenity-rich neighborhoods
4. Open publicly-supported housing to more NYers

Actions related to:

- A. Reforms to accelerate and advance land use actions that meet fair housing goals
- B. NYS barriers, including cap on residential density
- C. Historic districts
- D. Community board practices and accessibility

Goal 2: Facilitate more equitable housing development in NYC and the region

Strategies:

1. Expand coordination of housing policy and planning in the city and region
2. Ensure that land use processes effectively balance citywide needs and local perspectives
3. **Increase housing opportunities, particularly for low-income NYers, in amenity-rich neighborhoods**
4. Open publicly-supported housing to more NYers

Actions related to:

- A. City-owned properties
- B. Innovation in affordable housing subsidy
- C. Implementing MIH
- D. Limiting 421-a middle income option
- E. Limiting down-zonings
- F. New housing opportunities in low-density districts
- G. Micro-units, congregate living

Goal 2: Facilitate more equitable housing development in NYC and the region

Strategies:

1. Expand coordination of housing policy and planning in the city and region
2. Ensure that land use processes effectively balance citywide needs and local perspectives
3. Increase housing opportunities, particularly for low-income NYers, in amenity-rich neighborhoods
4. **Open publicly-supported housing to more NYers**

Actions related to:

- A. Housing Connect revamp
- B. Help with housing search and application processes
- C. Housing for non-citizens
- D. Staff/provider training for LGBTQ comfort and safety
- E. NYCHA Family Reentry Pilot

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

Issues:

- Aging housing stock with persistent housing quality challenges
- Limited protections for residents of unregulated and rent stabilized housing, who are vulnerable to displacement as demand for housing increases
- Lingering impacts of the mortgage foreclosure crisis and ongoing threats to homeownership by people of color

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

Strategies:

1. Preserve quality and affordability for existing residents
2. Protect tenants facing harassment and evictions
3. Protect homeowners vulnerable to fraud and scams

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

Strategies:

- 1. Preserve quality and affordability for existing residents**
2. Protect tenants facing harassment and evictions
3. Protect homeowners vulnerable to fraud and scams

Actions related to:

- A. NYCHA 2.0 preservation plan
- B. Landlord technical assistance
- C. Acquiring existing buildings
- D. Proactive inspections for health risks

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

Strategies:

1. Preserve quality and affordability for existing residents
2. **Protect tenants facing harassment and evictions**
3. Protect homeowners vulnerable to fraud and scams

Actions related to:

- A. Free legal representation
- B. Housing Court assistance
- C. Tenant blacklist regulation
- D. Tenant organizing, CONH, Speculation Watchlist

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

Strategies:

1. Preserve quality and affordability for existing residents
2. Protect tenants facing harassment and evictions
3. Protect homeowners vulnerable to fraud and scams

Actions related to:

- A. Uniform Partition of Heirs Property Act
- B. Cease and Desist zones

Goal 4: Enable more effective use of rental assistance benefits in NYC and the region, especially amenity-rich areas

Issues:

- Source-of-income discrimination
- Rental allowance limits and relocation challenges
- Barriers to landlords accepting vouchers
- Limited counseling and guidance on neighborhood choice

Goal 4: Enable more effective use of rental assistance benefits in NYC and the region, especially amenity-rich areas

Strategies:

1. Expand the number of homes available to NYers who receive rental assistance benefits
2. Improve the effectiveness, efficiency, and experience of services provided to rental assistance clients and landlords

Goal 4: Enable more effective use of rental assistance benefits in NYC and the region, especially amenity-rich areas

Strategies:

1. **Expand the number of homes available to NYers who receive rental assistance benefits**
2. Improve the effectiveness, efficiency, and experience of services provided to rental assistance clients and landlords

Actions related to:

- A. Source of income discrimination
- B. Registration with Housing Connect
- C. Evaluation of new mobility strategies, including higher payment standards and mobility counseling

Goal 4: Enable more effective use of rental assistance benefits in NYC and the region, especially amenity-rich areas

Strategies:

1. Expand the number of homes available to NYers who receive rental assistance benefits
2. **Improve the effectiveness, efficiency, and experience of services provided to rental assistance clients and landlords**

Actions related to:

- A. Service-design evaluation
- B. Client surveys to improve mobility counseling
- C. Staff/provider training in trauma-informed care

Goal 5: Create more independent and integrated living options for people with disabilities

Issues:

- Discrimination and failure to provide reasonable accommodations
- Lack of independent living options and pathways out of nursing homes
- Too few accessible apartments

Goal 5: Create more independent and integrated living options for people with disabilities

Strategies:

1. Increase support and improve processes for residents transitioning out of institutional settings
2. Improve process and remove barriers for people with disabilities to access affordable housing
3. Increase the number of affordable homes that are accessible

Goal 5: Create more independent and integrated living options for people with disabilities

Strategies:

- 1. Increase support and improve processes for residents transitioning out of institutional settings**
2. Improve process and remove barriers for people with disabilities to access affordable housing
3. Increase the number of affordable homes that are accessible

Actions related to:

- A. Task force with healthcare providers, insurance companies, and government

Goal 5: Create more independent and integrated living options for people with disabilities

Strategies:

1. Increase support and improve processes for residents transitioning out of institutional settings
2. **Improve process and remove barriers for people with disabilities to access affordable housing**
3. Increase the number of affordable homes that are accessible

Actions related to:

- A. Tracking, monitoring, and enforcement of accessible apartments in publicly-supported housing
- B. Comprehensive web portal with housing information
- C. Training for City staff, developers, and marketing agents on rights and responsibilities

Goal 5: Create more independent and integrated living options for people with disabilities

Strategies:

1. Increase support and improve processes for residents transitioning out of institutional settings
2. Improve process and remove barriers for people with disabilities to access affordable housing
3. Increase the number of affordable homes that are accessible

Actions related to:

- A. Financial assistance for modifications in existing apartments/buildings
- B. Education on legal responsibilities and best practices for architects and developers

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Issues:

- Historic investment decisions that have led to ongoing disparities and overburdened social infrastructure
- Limited financial services and insufficient career pathways
- Overexposure to health hazards in certain neighborhoods
- Policing and criminal justice issues
- Segregated schools with varying resources
- Limited access to public transportation for people with disabilities

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

1. Launch a Racial and Social Equity Initiative to integrate equity perspectives into government decision-making
2. Decrease violence through evidence-based, restorative methods in parts of the city that still experience violence disproportionately
3. Improve household financial security and wealth-building opportunities, particularly in neighborhoods with concentrated poverty
4. Build the foundation for more diverse, integrated schools throughout the five boroughs
5. Improve access to the NYC region's public transportation network

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

1. **Launch a Racial and Social Equity Initiative to integrate equity perspectives into government decision-making**
2. Decrease violence through evidence-based, restorative methods in parts of the city that still experience violence disproportionately

Actions related to:

- A. Citywide goals/metrics for reducing disparities
- B. Resources for evaluating capital planning, budgeting, and policy-making
- C. Capacity building at key agencies
- D. Community-based planning

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

1. Launch a Racial and Social Equity Initiative to integrate equity perspectives into government decision-making
2. **Decrease violence through evidence-based, restorative methods in parts of the city that still experience violence disproportionately**

Actions related to:

- A. Social service plans for target neighborhoods
- B. Activation of underused public spaces

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

3. **Improve household financial security and wealth-building opportunities, particularly in neighborhoods with concentrated poverty**
4. Build the foundation for more diverse, integrated schools throughout the five boroughs

Actions related to:

- A. Bridge programs and job training
- B. Financial counseling
- C. NYCHA earned income disallowance
- D. HPD homeownership program evaluation
- E. Childhood savings programs
- F. CRA advocacy and improvements

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

3. Improve household financial security and wealth-building opportunities, particularly in neighborhoods with concentrated poverty
4. **Build the foundation for more diverse, integrated schools throughout the five boroughs**

Actions related to:

- A. District diversity plans
- B. School rezoning processes
- C. Alternate geographic preferences
- D. Addressing bias in school performance
- E. School info for families with rental and housing assistance

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

Strategies:

5. Improve access to the NYC region's public transportation network

Actions related to:

- A. ADA accessibility in subways
- B. Sensory accessibility for transit announcements/information
- C. Affordable transit access
- D. E-hail for people with disabilities
- E. Commuting needs for those outside of core job centers

draft goals

1. Combat persistent, complex discrimination with expanded resources and protections
2. Facilitate more equitable housing development in NYC and the region
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5. Create more independent and integrated living options for people with disabilities
6. Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

what comes next

Multiple opportunities to share feedback on the draft goals, strategies, and actions

- Finalize Stakeholder Roundtables – May 21 and 29
- Public Hearing 1 – June 12
- Where We Live NYC Summit – June 22

DRAFT REPORT RELEASED

- Where We Live NYC Listening Tour – July/August
- Public Comment Period Ends & Hearing 2 – September

FINAL REPORT RELEASED

Where We Live NYC

Fair Housing Stakeholder Group

Finalize Phase Roundtables Synthesis

June 4, 2019

About

This document summarizes the main feedback shared by the Fair Housing Stakeholder Group at the Finalize Phase Roundtables, held in May 2019. These roundtables served as an opportunity for stakeholders to hear a briefing and provide feedback on the City's emerging approach to goals and strategies for Where We Live NYC. This document provides a synthesis of both overarching and specific feedback from the approximately 70 stakeholders who participated across the two roundtables.

Key Themes in Feedback

Overall, the stakeholders that participated in the roundtables provided positive feedback on the preliminary approach and validated the importance of several strategies. Those that have been involved from early in the process expressed seeing their ideas directly incorporated. However, feedback received in this roundtable, for the most part, repeats ideas that stakeholders already shared in previous roundtables that were not part of the preliminary approach shared, with some additional nuances. Stakeholders wanted to see the following in the City's overall approach:

- Accountability and involvement of private sector to contribute to goals; creative partnerships
- Involvement and education of elected officials on issues and resources
- Reordering of goals and strategies (e.g., preservation before new development; most impactful first, etc.)
- Specific details of implementation, including timeline, metrics of success
- Accountability mechanisms for the City to implement and sustain funding and resources (e.g., legislating resources)

While more specific feedback is organized by goal in the following pages, some commonly-heard gaps were:

- Real estate industry accountability measures, including higher penalties and more robust enforcement
- Education and training of tenants, landlords, and CBOs as part of combatting discrimination
- Interim solutions to support tenants while waiting for lengthy processes (affordable housing application, case investigations, etc.)
- Public housing strategies beyond what NYCHA 2.0
- Explicit improvements to language access across goals for populations with limited English proficiency
- Accessibility for people with disabilities beyond housing (e.g., schools, housing court)
- NYPD strategies around reducing punitive policing and coordinating with other agencies
- Homeownership strategies – new construction and preservation
- Permanent affordability strategies, including innovative collaborations with CLTs
- Strategies addressing homelessness and needs of those of lowest incomes (under 30% of AMI)
- Improvements to transportation quality and capacity beyond accessibility (e.g., express buses)
- Environmental neighborhood improvements (improved school or community facilities, reducing vacancy, climate resiliency, etc.)

Goal 1: Combat persistent, complex discrimination with expanded resources and protections

1.1 Strengthen NYC's fair housing enforcement

1.2 Expand NYC's fair housing protections

Stakeholders felt the following strategies or actions were missing:

- 1.1 - Stronger accountability measures for the real estate industry to effectively change behavior++++
 - Higher penalties such as fees, jail time, removing licenses, etc.
 - Monitoring of landlords and brokers
- 1.1 - Trainings and education for landlords and brokers about their obligations+++
 - Coordination with NYS Division of Licensing for Real Estate agents, connecting with accountability
- 1.1 - Training and funding for CBOs and legal service providers, to provide support for tenants or buyers, especially those with disabilities or immigrants, to identify and make discrimination complaints++
 - Undocumented aren't likely to go to govt., but they will go to social service orgs
 - Clarity on the overall complaint process for the public
 - Improved coordination between CBOs and various City agencies for referrals
 - Need a mission-driven organization to provide rental broker service+
- 1.1 - Models for quick intervention in cases, rather than long legal action+++
 - Some sort of interim support so people can find a place to live / do not lose apartments
 - Streamlining of investigation process so cases can be resolved faster
- 1.2 - New laws regulating landlords and brokers to reduce barriers+
 - Outlaw credit check and brokers fees
 - Require landlords to publish standard requirements for leasing and notice of fair housing rights

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 1.1a - Conduct testing in general, not just paired testing, and make enforcement more robust
- 1.1c - Co-op/condo specificities
 - Legislation to require documentation of why someone was not accepted into a co-op.++
 - Co-ops and condos receiving public subsidy should be subject to greater scrutiny
 - Co-op boards need to be broken up and monitored to ensure they are not discriminating
- 1.2a - Criminal record investigation for housing should be outlawed, except for serious sex offenses. Broad categories have a lot of nuance not understood by landlords
 - Defining justice involved – need to protect not only those who have been convicted, but arrest records can also impact ability to access housing

Goal 2: Facilitate more equitable housing development in NYC and the region

2.1 Expand coordination of housing policy and planning in the city and region

2.2 Ensure that land use processes effectively balance city-wide needs and local perspectives

2.3 Increase housing opportunities, particularly for low-income New Yorkers, in amenity-rich neighborhoods

2.4 Open publicly-supported housing to more New Yorkers

Stakeholders felt the following strategies or actions were missing:

- 2.1 - Evaluation of existing affordable housing programs and their impact on increasing or reducing segregation, analyze concentration of concentration of shelters and supportive housing+
 - Part of this is also considering types of affordable housing under NYCHA infill development in amenity-rich neighborhoods
- 2.1 - Ensuring NYCHA residents aren't paying higher rents because they are in wealthier neighborhoods (higher FMRs).
- 2.2 - Requirements for more transparency on the costs and profit for developers
- 2.3 - Permanent affordability strategies in amenity-rich areas, especially for City-owned land+++++
- 2.3 - Strategies to address unequal housing quality and amenities within mixed-income developments++,
 - "Poor doors;" low income tenants' ability to access all amenities, such as gym, roof, etc.
- 2.3 - Expansion of homeownership opportunities for low and moderate income households++
 - Collaborations with CLTs to buy the land and the homeowner buys the home+
- 2.3 - MIH reforms to deepening affordability levels and increase percentage that is affordable+
- 2.4 - Strategies for lowest income households (significantly under 30% of AMI) without any rental assistance++
- 2.4 - Affordable housing options for non-citizens (there is a NYS bill)
- 2.4 Reforms to NYCHA admissions and succession, so that family members or friends serving as live-in care-takers care can remain in the apartment

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 2.1a - Regional housing one should be bumped down the list so if it doesn't seem like it's really impactful
- 2.1b - Needs to also incorporate a health lens to determine housing needs in an area—ensuring enough safe housing for single young men, and assessing social services and other needs in the area+
- 2.1c - In rezonings and capital investments, need to disaggregate and distinguish between existing unmet needs vs. what is intended for future populations
- 2.1c - Moratorium on rezonings in low-income communities of color is needed until displacement impacts are evaluated
- 2.2a - Clarity on the types of developments that would be accelerated, and ensuring that it is not the kind of development that would create a speculative boom in neighborhoods and cause displacement pressures
- 2.2d - Call out language accessibility specifically in ensuring Community Boards have inclusive practices
- 2.3b - Needs fewer documents for people to prove eligibility - process is dehumanizing. Sometimes this is about LIHTC investors - advocate with HUD and LIHTC investors to reduce paper requirements.
- 2.3g - Caution on micro units and focus on unit counts+. Need intentionality in building multi-bedroom homes, not just studios and one bedrooms. This may disproportionately impact people of color and immigrants, who may have larger family sizes, and people with disabilities who may need a live-in care taker.
- 2.4b - Housing Ambassadors should do more than just housing connect but other forms of housing as the name indicates
- 2.4e - Need to amend Permanent Exclusion policy to evaluate and reduce infractions that lead to eviction, and educate advocates and CBOs on the process.

Goal 3: Preserve affordable housing and prevent the displacement of long-standing residents

3.1 Preserve quality and affordability for existing residents

3.2 Protects tenants facing harassment and evictions

3.3 Protect homeowners vulnerable to fraud and scams

Stakeholders felt the following strategies or actions were missing:

- 3.1 Language accessibility improvements in tracking repairs (private and public housing)++
- 3.1 Accountability for NYCHA – need third party inspectors to not allow contractors to get away with things like painting over mold; no inspection protocol makes it hard to build a court case for tenants
- 3.1 Addressing illegal sublets/AirBnB in rent stabilized apartments+
- 3.1 Solutions to help address illegal basements
 - Transition plan - supporting tenants that are evicted for living in illegal apartments++
 - Supporting owners that received violations for renting out their basements who need the rent
- 3.2 Availability, quality, and legal competency of accessibility accommodations in housing court for people with disabilities (physical, sensory) and LEP.
- 3.2 Rent regulation reform; also re-evaluation of J-51 rules
- 3.2 Increasing accountability mechanisms for landlords, predatory lenders, speculative investors, and tenant eviction groups to change behavior and increase compliance +++++
 - Higher penalties, criminal prosecution, establishing landlord license/grades, expand enforcement capacity of HPD and DOB, etc.; higher penalties for landlord retaliation
- 3.2 Court and shelter diversion strategies to help tenants stay in place (e.g., expanding rental assistance, rent freeze programs, exploring rent-roll-backs, etc.)++
- 3.2 Right to return for people who already have been displaced
- 3.2 Expanding tenant education; empowering residents by training them on housing inspections
- 3.3 Helping homeowners at risk to stay in their homes++++
 - Homeowner education and support in multiple languages to address fraud, scams, aggressive third party debt collectors while on tax liens, plus trainings for CBOs
 - CLT collaborations to preserve HDFC co-ops and owners in reverse mortgages; sell land to CLT and open up cash to make improvements to building where ownership is retained
 - Tax lien sale reforms

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 3.1a NYCHA 2.0 ++++
 - Need strategies to get more money for NYCHA improvements and reform the speed and quality of repairs, such as
 - the State bill currently trying to limit tax abatements for co-op owners, and use the money saved to fund NYCHA
 - Air rights transfer could apply to a broader geography, not just surrounding buildings
 - Disappointments with current quality remediation efforts and NYCHA 2.0
 - Stop chronic rent delinquency administrative process and clarify the standards
 - Need clarity on RAD and future tenants' rights – legal service groups don't know how to defend tenants in court
- 3.2 a Need to reform of right to counsel to enable HP actions, representation before eviction notices, and expanding income eligibility, and clarifying who is currently covered/eligible
- 3.3b Cease and Desist implementation requires coordination with existing groups advocating for these
- 3.2c Tenant blacklist use needs legislation requiring additional context, such as why someone was evicted

Goal 4: Enable more effective use of rental assistance benefits in NYC and the region, especially in amenity-rich areas

4.1 Expand the number of homes available to New Yorkers who use rental assistance benefits

4.2 Improve the effectiveness, efficiency, and experience of services provided to rental assistance clients and landlords

Stakeholders felt the following strategies or actions were missing:

- 4.1 Education campaign for landlords and tenants on source of income rights/responsibilities
- 4.1 Landlord accountability measures, e.g., performance, grading, enforcement
- 4.1 Training of community-based organizations how to help voucher holders find apartments, navigate paperwork, identify discrimination, etc.+
- 4.1 Connecting voucher holders to opportunities in the region, not just in NYC (voucher discrimination regionally also needs to be addressed)
- 4.1 Centralized list of vacant apartments – could be a legislative and tech fix
- 4.1 Developers receiving any subsidy or tax break should be required to take vouchers
- 4.1 Strategies to ensure voucher holders don't lose a potential apartment if facing discrimination (e.g., freezing of rental unit once a discrimination complaint is made, and streamline the claim process so the owner doesn't lose all that time with a vacant unit)
- 4.2 Connecting tenants with CBOs in amenity-rich neighborhoods to support with transitions

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 4.2a Need to invite stakeholder groups to participate in improving the service design for voucher holders
- 4.2a Ensuring that experience for landlords is also improved
- 4.2b Need means to enable voucher holders to extend voucher expiration during lottery process. Voucher holders who are applying for affordable housing via Housing Connect (a 2-10 month process) have only a limited amount of time to apply and can lose their rental assistance.
- 4.2b Legislation or support tenants who win the lottery and need to break their current lease, but may face consequences due to terms on their lease (impact on credit score, paying a penalty fee, or loss of security deposit)
- 4.2c All vouchers should have the same payment standard so they don't compete with each other. Section 8 pays more than CityFEPS++
 - Consolidation of voucher programs under one agency

Goal 5: Create more independent integrated living options for people with disabilities

5.1 Increase support and improve processes for residents transitioning out of institutional settings

5.2 Improve process and reduce barriers for people with disabilities to access affordable housing

5.3 Increase the number of affordable homes that are accessible

Stakeholders felt the following strategies or actions were missing:

- 5.3 Improvements to NYCHA reasonable accommodation requests - proper tracking mechanism
- 5.3 Need to apply universal design principles in all new development
- 5.3 Increase in Disability set aside +++
 - Consider set-asides for different types of disabilities
 - Build units to be universally accessible, with some units that have specific/full standards for people with mobility/sensory needs, while increasing the preference for people with disabilities.
 - For homeownership units, identify owners with disabilities with the set aside first, and build the accommodations to be specific to their needs.
- 5.3 How to support tenants in old pre-war buildings that cannot be made accessible
 - E.g., program to swap apartments?
- 5.3 Examination of DOB's process for issuing certificates of occupancy++
 - Ensure self-certification does not become a way to get around building code/ADA compliance
- 5.3 Testing of all existing developments with regulatory agreements for accessibility, and setting goals for the increase in number of units to be accessible.

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 5.1a Clarify what kind of people with disabilities and what institutions
- 5.1a CBOs need to be at the table for the task force to reform existing programs for people to leave nursing homes, including supportive housing developers to learn from their experiences+
 - Suggestion to also include landlords, both non-profit and for-profit
- 5.3a Idea to create an incentive/program for landlord to retrofit apartments as they become vacant to be ADA accessible

Goal 6: Address the neighborhood-based legacy of discrimination, segregation, and concentrated poverty by increasing access to opportunity for protected classes

- 6.1 Launch a Racial and Social Equity Initiative in NYC and integrate equity perspectives into government decision-making
- 6.2 Decrease violence through evidence-based, restorative methods in parts of the City that still experience violence disproportionately
- 6.3 Improve household financial security and wealth-building opportunities, particularly in neighborhoods with concentrated poverty
- 6.4 Build the foundation for more diverse, integrated schools throughout the five boroughs
- 6.5 Improve access to the NYC region's public transportation network

Stakeholders felt the following strategies were missing:

- 6.2 NYPD fewer punitive strategies+++ and better coordination with other agencies like HPD, HRA, DOE
 - Policing of low income communities leads to displacement and exacerbates legacy of discrimination. Need to evaluate community policing program.
- 6.3 How to address vacant buildings and absent landlords+ that can negatively impact property values and retail corridors
- 6.3 Strategies to increase banking access in certain neighborhoods
- 6.3 Create a public bank in NYC that can be used to more strategically invest in NYC needs (New Economy Project is leading); expanding credit unions
- 6.3 Homeownership programs for NYCHA residents
- 6.3 Local hiring requirements++
- 6.4 Improving accessibility of schools+
- 6.4 Ensuring charter schools are also diverse and not negatively impacting local school districts
- 6.4 Services and strategies specifically to support homeless students++
- 6.4 Revisit school funding formulas to ensure schools with high rates of poverty have adequate funding
- 6.5 Improvements to Access-A-Ride beyond E-hail+
- 6.5 Plan for bus improvements and more express bus routes+=+.
- 6.5 Strategies to help people commuting outside of peak hours
- Additional strategy: Want to see more amenity planning in the neighborhoods+++
 - healthier foods, book stores, retail; connections to worker cooperatives
 - Community centers, after school programs, parks, and improving the facilities for these in low-income neighborhoods++
- Additional strategy: Resiliency, environmental justice, location of health hazards

Stakeholders also provided more nuanced suggestions for the preliminary actions:

- 6.2a Restorative justice needs to focus not just on juvenile justice, but the older folks too
- 6.3a Inclusion of LEP in all of these programs (job trainings, etc.)
- 6.3b Educating people about retirement savings
- 6.1d Community-driven planning cannot be superficial and must be a grass-roots process++
 - Focus on asset-based not deficit-based community planning
 - Also, move this up on the list so it's not an afterthought
- 6.3a Need to leverage housing partnerships and connect with education/workforce partners since jobs and housing go hand in hand+
- 6.5b Language accessibility on public transportation for announcements, directions, etc.
- 6.5d Clarity of the need to expand E-hail On Demand, where you can call anytime, not just E-Hail, where you have to call in advance to make reservation.
- 6.5c Need to include PATH/Port Authority in regional conversation+
 - Half fares for people with disabilities is not applicable for PATH/Port Authority
- All: Need clarity on accountability mechanisms for agencies to implement these++

Appendix C

Response to Public Comments Received on the Draft Plan

Introduction

Appendix C summarizes and provides the City’s responses to all oral and written comments received during a public comment period from January 7 to March 7, 2020, and a public hearing held on February 6, 2020. The New York City Department of Housing Preservation and Development (HPD), the New York City Housing Authority (NYCHA), and the New York City Department of City Planning (DCP), on behalf of the City of New York, solicited feedback on the draft Where We Live NYC Draft Plan. All comments that the City received have been carefully reviewed in their totality and considered for changes in the final Where We Live NYC Plan.

Although the Trump Administration delayed and then rescinded the 2015 affirmatively furthering fair housing rule (“AFFH rule”), the City undertook a comprehensive fair housing planning process, using the guidance issued by HUD in 2015 and going beyond minimum requirements with data analysis and public engagement. Some commenters believe the Where We Live NYC Draft Plan would not meet the standards of the 2015 guidance. While HUD no longer requires grantees to complete an Assessment of Fair Housing or an Analysis of Impediments, City believes the Where We Live NYC Plan represents its strong commitment to an affirmative fair housing plan that promotes equal housing opportunity and the creation of thriving and diverse neighborhoods across the five boroughs.

List of Individuals Who Provided Comment

1. Chaim Brooks, Bronx resident, written testimony.
2. Suhali Méndez, Disability Justice Program at New York Lawyers for the Public Interest, written testimony.
3. Brennan Ortiz, Bronx resident, written testimony.
4. Manhattan Community Board 11, written testimony.
5. Annie Carforo, Neighbors Together, written testimony.
6. Vaylateena Jones, President of the Lower East Side Power Partnership, written testimony.
7. Martin Treat, member of Manhattan CB4, written testimony.
8. Craig Gurian, Executive Director of the Anti-Discrimination Center, written testimony
9. Anderson Fils-Aime.
10. Gregory Jost, Consultant to Banana Kelly Community Improvement Association, written testimony.
11. Jared Burns, New York State Association of Realtors, written testimony.
12. Moses Gates, Vice President for Housing and Neighborhood Planning at the Regional Plan Association, oral and written testimony.
13. Jacquelyn Simone, Policy Analyst, Coalition for the Homeless; written testimony.
14. Fred Freiberg, Executive Director, Fair Housing Justice Center, written testimony.
15. David Tipson, New York Appleseed, written testimony
16. Paul Epstein, Northern Manhattan is Not For Sale, written testimony.
17. Jeanne Ruskin, Inwood Legal Action, written testimony.
18. Elizabeth Kocienda, New York City Bar, written testimony.

19. Jack Mullan, Citizens' Committee for Children of New York, written testimony.
20. Beth Finkel, State Director of the American Association of Retired People (AARP), written testimony.
21. Lourdes Rosa-Carrasquillo, Director of Advocacy for The Center for Independence of the Disabled's (CIDNY), written testimony.
22. Rachel Fee, Executive Director, New York Housing Conference, oral and written testimony.
23. Bruno Daniel Garcia, representative of Communities Resist, written testimony.
24. Julia Duranti-Martinez, representative of the NYC Community Land Initiative, written testimony.
25. Paimaan Lodhi, Senior Vice President, Real Estate Board of New York (REBNY), written testimony.
26. Center for New York City Neighborhoods, written testimony.
27. Chris Walters, Rezoning Technical Assistance Coordinator, Association for Neighborhood & Housing Development, written testimony.
28. Sabine Aronowsky, representative of the Gowanus Neighborhood Coalition for Justice.
29. Philip Simpson, representative of Northern Manhattan is Not For Sale, oral testimony.
30. Dan Miller, board member of Open New York, oral testimony.
31. Maxwell Cabello, land use policy analyst at Churches United for Fair Housing, oral testimony.
32. Elizabeth Ginsburg, Enterprise Community Partners, written testimony.
33. Jennifer Gutierrez, Chief of Staff for Council Member Antonio Reynoso (34th district), oral testimony.
34. Daniel Carpenter Gold, Representative of TakeRoot Justice, oral and written testimony
35. Casey Berkovit, oral testimony.
36. Sheena Kang, representative of Citizen's Housing and Planning Council, oral testimony
37. Adrien Weibgen, oral testimony.

Comments and Responses

Note that the summaries that follow are intended to convey the substance of the comments, but do not all quote the comments verbatim. All references to numerical goals or actions – for example, “Goal 1” or “Action 1.1.1” – are references to the Fair Housing Goals & Strategies described in Chapter 6 of this Plan.

Comment 1:

Chaim Brooks, Bronx resident, provided two separate written testimonies outlining a number of concerns, including 1) risky mortgages that lead to foreclosure and tenant hardship, 2) the perceived low quality of salespersons and cashiers in low-income neighborhoods that detract from neighborhood investment in local business, 3) the need for a program to help landlords accommodate people with disabilities, 4) the need for greater housing choice for people with disabilities whose income disqualifies them from rental subsidy, 5) the need for greater housing choice for registered sex offenders and people with justice system involvement with housing choice, and 6) support for residents suffering post-traumatic stress disorder resulting from interactions

with abusive landlords, and 7) stronger labor protections.

Response 1:

The Where We Live NYC Plan includes a number of actions to address the fair housing issues Brooks raised, including new protections for people with justice system involvement, new resources for people with disabilities, and assistance for low-income homeowners of color. Brooks additionally raises issues of neighborhood-based disparities that are addressed in Goal 6.

Comment 2:

Suhali Méndez, an Advocate in the Disability Justice Program at New York Lawyers for the Public Interest (NYLPI), submitted comments about the need for the City to address housing accessibility issues and called on the City to fight discrimination, address segregation, and strengthen fair housing protections on behalf of people with disabilities. NYPLI describes issues ranging from owners' failure to provide reasonable accommodations or make repairs to denying leases based on source of income, contributing to segregation of people who have disabilities. NYLPI requests that HPD support bill S.6220 requiring landlords to prominently disclose tenants' right to reasonable accommodations and implement accountability measures for those landlords who fail to provide reasonable accommodations or who retaliate against tenants who exercise their rights.

Response 2:

Addressing the obstacles to fair housing experienced by New Yorkers living with disabilities is central to the City's commitment to affirmatively furthering fair housing. Many of the actions throughout the report will benefit people with disabilities, such as greater enforcement against discrimination based on source of income, and is most clearly evident in Goal 5, which is to "create more independent and integrated living options for people with disabilities." The City is committing to a number of actions to prevent discrimination against and expand living options for people with disabilities.

Comment 3:

Brennan Ortiz, a Bronx resident, asks that the City proactively plan for the creation of Community Land Trusts throughout the five boroughs, and look into implementing a moratorium on luxury developments in communities where the market shows there is already a glut of this construction.

Response 3:

Action 6.3.1 seeks to accelerate opportunities for mission-based groups, including Mutual Housing Associations and Community Land Trusts, to create and preserve community-owned or shared-equity housing. The City will release a request for information (RFI) for innovative models and provide ongoing technical assistance and capacity building for community land trusts and other mission-based groups with the goal of gaining over 3,000 units of community-owned or shared equity housing. The City additionally commits to expanding the availability of all types of housing in neighborhoods across the city.

Comment 4:

Manhattan Community Board 11 submitted written testimony stating that the plan did not adequately address the following:

- Discriminatory bad actors, such as landlord harassment: CB11 recommends instituting penalties that exceed the return on investment for displacing rent stabilized tenants, including increased fines and placement on the “100 Worst Landlords List.”
- Warehousing of vacant units: CB11 recommends imposing a vacancy tax on warehoused properties or properties that are non-primary residences that are vacant for the majority of the year.
- Use of credit histories for leasing: CB11 recommends utilizing rent history as a determining factor in place of good credit.

CB11 had the following comments in reference to the following specific draft strategies:

- Draft Plan Action 2.1.1 regarding length of ULURP process: CB11 asks that there be no reduction of the time allowed in the land use review process for community boards.
- Draft Plan Action 2.1.2 regarding removing the state cap on residential floor area ratio: CB11 firmly opposes any removal of FAR caps.
- Draft Plan Action 2.2.1 regarding new assessment tools that incorporate a fair housing lens when making decisions on siting and type of housing, including NYCHA infill: CB11 calls for any revenue derived from NYCHA infill to be prioritized for host campus, asks that green space on NYCHA developments be available to the community, and recommends that NYCHA infill projects go through ULURP.
- Draft Plan Action 2.2.4. regarding establishment of a regional housing and transit agenda, and Draft Plan 2.3.1 regarding the establishment of an expert task force on zoning and land use for equitable growth: CB11 would like to participate in any/all such forums and recommends community resident participation as well.
- Goal 3, regarding preservation of affordable housing and prevention of displacement of long-standing residents: CB11 suggests using a neighborhood-based AMI and providing affordable units to East Harlem residents that fall below 30% AMI.
- Goal 5, regarding creation of more independent and integrated living options for people with disabilities: CB11 notes that developers are the primary decision-makers, and yet, unlike architects, they are not required to receive continuing education that keeps them up to date on code compliance as it relates to ADA accessibility.
- Draft Plan Action 6.1.2, regarding the incorporation of fair housing goals and equity metrics into the citywide Social Indicators Report: CB11 suggests prioritizing access to green space and resilient landscaping in addition to housing, to address health inequities and promote healthier, more sustainable neighborhoods that are less vulnerable to the effects of flooding in extreme weather. They also note that East Harlem has higher temperatures than other Manhattan neighborhoods, which has been linked to increased levels of violence.

Response 4:

The City is committed to balancing the importance of collecting feedback from Community Boards and hard to reach communities with critical fair housing goals of supporting the development of more fair housing, expanding housing options for all New Yorkers and especially the most vulnerable New Yorkers, and removing obstacles to fair housing. Regarding the responsibil-

ities of developers to uphold relevant building and construction codes to ensure accessibility for people with disabilities, Action 5.3.3 recommends new trainings for developers in this area.

Finally, the City's Social Indicators and Equity Report includes numerous indicators on health disparities as well as on neighborhood environmental conditions, such as rates of Fine Particulate Matter, New Yorkers Living Within Walking Distance of a Park, and Open Space Ratio.

Comment 5:

Annie Carforo of Neighbors Together, provided written testimony regarding paired testing and city vouchers. Pursuant to Draft Plan Action 1.1.1 calling for expanded testing investigators, Neighbors Together believes the New York City Commission on Human Rights (CCHR) rather than the Department of Social Services (DSS) should take the lead on expanding testing, based on their perceived superior effectiveness upholding the Human Rights Law and their ability to assist New Yorkers on an individual basis. With regard to training city staff and partners to improve the experience of using rental assistance, HPD should specify that case workers need to improve their understanding of Human Rights Law, particularly regarding source of income, and be trained to report discrimination.

Neighbors Together also calls for a more in-depth discussion of, and recommendations around, local rental assistance programs. They observe that the low payment standards in these programs (claiming, for example, that CityFHEPS falls \$400 below FMR on average) cause voucher holders to remain segregated in low-income neighborhoods.

Response 5:

The City shares Neighbors Together's concern for ensuring that the City's testing infrastructure is as strong as possible. Both CCHR and DSS are currently involved in housing discrimination testing and enforcement and will continue to coordinate on these shared responsibilities moving forward. The Where We Live NYC Plan has a number of actions seeking to ensure greater mobility for all rental assistance users, including expanded enforcement of source of income discrimination.

Comment 6:

Vaylateena Jones, President of the Lower East Side Power Partnership, provided written testimony to express the concerns with the following Where We Live NYC goals and strategies:

- Goal 1: Incentives for middle-income housing to create diverse communities that provide low-income children with better opportunities.
- Goal 2: A housing agenda that promotes diversity, housing integration, inclusionary growth, and investments in preservation of affordable housing through additional preservation projects in the zip code in which new construction is planned and the availability of some units at AMI levels that match the zip code when the local AMI is less than the region
- Goal 3: Concrete economic commitments and action steps to address maintenance and repairs in NYCHA developments
- Goal 6: Implementation of strategies recommended by the 2nd Grade Universal Literacy

Reading Coaches in their report “Integrated Schools in a Segregated City: Ten Strategies that Have Made New York City Elementary Schools More Diverse,” especially within NYC Youth and Community Development Neighborhood Development Areas.

Response 6:

The Where We Live NYC plan includes concrete strategies to promote mixed-income and affordable housing, invest in NYCHA, reduce disparities in economic opportunities, and build the foundation for more diverse, integrated schools.

Comment 7:

Martin Treat, a member of Manhattan CB4, provided written testimony advocating for an increase in the percentage of affordable housing units set aside for people with disabilities, from the current 5-7% to at least 7-9%. He notes that people with disabilities comprise roughly 12% of NYC’s population. Further, he recommends that people with disabilities have special priority for affordable housing near the central business district to be able to wheel to work and avoid inaccessible subways, access-a-ride, or expensive taxis. Specifically, he notes that people with disabilities have been excelling in tech services, which are largely concentrated in Manhattan, and therefore accessible housing should be focused there.

Response 7:

As a result of the Where We Live NYC planning process and extensive engagement with New York’s disability community, HPD will evaluate potential changes to the set asides in HPD-assisted housing for people with disabilities, including the number of homes set aside and the types of disabilities accommodated. The City will look to new sources of data about New Yorkers living with disabilities by disability type and about the accessibility of the city’s housing stock. Goal 5 additionally includes strategies to improve the ability of people with disabilities to find accessible housing in neighborhoods of their choosing.

Comment 8:

Craig Gurian, Executive Director of the Anti-Discrimination Center and counsel for plaintiffs in a federal lawsuit challenging the City’s community preference policy, says that the City’s community preference policy is not specifically addressed in the Draft Plan, and he believes that the policy has a disparate impact based on race and that it perpetuates segregation.

Gurian encourages the City to review the materials submitted by plaintiffs in this lawsuit and to consider the issues raised therein.

Gurian also believes that the final plan must focus on more concrete solutions. Finally, he asks that the Plan state three things:

- (a) existing residential patterns of non-Latino African Americans, non-Latino Asians, and Latinos of any race were not created, and are not maintained, by anything resembling unfettered choice;
- (b) a more residentially racially-integrated New York City is part of the “vision” that the City is committed to making come true; and
- (c) all of New York City’s neighborhoods belong to all of New York City’s residents.

Response 8:

The City has responded to the materials submitted by the plaintiffs in the lawsuit referenced in Gurian’s comment through its cross-motion for summary judgment, filed recently in federal court.

Throughout the Where We Live NYC Plan, the City reiterates that a long history of discrimination, segregation, and injustice have shaped the neighborhoods that New Yorkers live in today. Moreover, the City reiterates its commitment to following a balanced approach to advancing fair housing, which seeks to empower New Yorkers with realistic choices to live in thriving, integrated neighborhoods and to ensure no one is deprived of access to fundamental resources because of their race, ethnicity, disability, religion, or other protected characteristic.

As stated in Goal 3, the City believes that the community preference policy in the allocation of new construction affordable housing is a vital tool in preventing the displacement of New Yorkers from their neighborhoods. HUD recognized displacement as a contributing factor to fair housing issues in its 2015 AFFH Guidebook, which the strategies and actions in Goal 3 seek to address.

Comment 9:

Anderson Fils-Aime writes that the desegregation of schools is critical to the desegregation of neighborhoods and recommends following the plans of Teens Take Charge, IntegrateNYC, and NYCASID.

Mr. Fils-Aime also thinks the City should create a campaign to end and financial illiteracy and inform tenants of their rights, through new trainings in schools, places of worship, and social services centers. Mr. Fils-Aime additionally recommends pairing housing assistance with financial literacy classes, subsidized renters’ insurance, and mental health support, especially for low-income residents moving to communities with little affordable housing where neighborhood residents may be hostile towards new residents.

Mr. Fils-Aime recommends that these initiatives be funded through increased fines for landlords for DOB and HPD violations.

Response 9:

Comments noted.

Comment 10:

Gregory Jost, Consultant to the Banana Kelly Community Improvement Association, commends the City for using a race-specific lens to look at inequalities in the City and region, visualizing a robust set of data to make it accessible, acknowledging the fraught racial history that has created a lack of trust between communities of color and government, and trying to amend the lack of trust by contracting with grassroots partners to do direct community engagement. Jost suggests the City go further, however, by acknowledging the government’s fraught role post-1968, including policies of “benign neglect” and “planned shrinkage” during the late 1960s into the early 1980s,

which launched an era of pathologizing poor people of color that arguably continues today. Second, Jost advocates that closing the racial wealth gap requires looking beyond the pre-1968 homeownership policies such as redlining, and grapple with the persisting lack of ownership and control of land, housing and other forms of wealth. Community ownership models (e.g., Mutual Housing Associations, Community Land Trusts, Community Development Credit Unions, Worker Owned Cooperatives) should be central to the Where We Live NYC Plan and framework, as they allow for value capture, a balancing of diverse and sometimes contradictory needs (such as prevailing wages, local hiring, MWBE contracting, community preference, and deep affordability), increased civic engagement and community wealth building.

Additionally, Jost believes the City should apply the methodology of Where We Live NYC to engage in real community planning instead of the current tool of large-scale top-down rezonings. Jost supports a smaller scale planning process led jointly by the City, local partners and residents that prioritizes site acquisition strategies into a Community Land Trust as part of any change in zoning, and believe this would increase community control, limit displacement, and meet both surface goals (units created) and underlying transformative goals like racial equity.

Response 10:

See Response 3. Regarding community-based planning, Action 6.1.5 recommends that in key neighborhoods that have historically experienced disinvestment, conduct community-based planning processes, such as the Brownsville Plan, to ensure government policies and capital plans are informed by a diversity of local perspectives.

Comment 11:

Jared Burns of the New York State Association of Realtors (NYSAR), writes that maintaining the integrity of fair housing policies in New York is of the utmost importance. NYSAR supports addressing discrimination in cooperative transactions, and publicly funding fair housing testing. NYSAR suggests, however, more clarity and specificity around how the private market may be used to “address financial barriers that impede residents’ housing choices and may be used as proxies for discrimination.” Additionally, NYSAR believes that cease and desist zones are overly restrictive and ineffective, not creating a single unit of affordable housing and only causing harm to legitimate licensed real estate professionals.

Response 11:

The action to “address financial barriers that impede residents’ housing choices and may be used as proxies for discrimination” was removed in the final Where We Live NYC Plan because some of the issues that the action intended to address were covered in the 2019 Housing Stability and Tenant Protection Act. In 2020, as separately noted in Goal 2, the City issued a commitment to piloting security deposit alternatives within City-financed developments. In addition to these efforts, the City will continue to explore ways to address the financial barriers that can be proxies for discrimination.

Comment 12:

Moses Gates, Vice President for Housing and Neighborhood Planning at the Regional Plan Association (RPA), applauds the administration for conducting this assessment of fair housing and

the goals contained therein, but notes disappointment in a lack of specificity of the proposed actions and a lack of metrics for measuring success of the plan. For all recommendations which do remain in the exploratory stage in the final report, the RPA recommends the administration commit to issuing an update on policy changes that have resulted from these explorations or explaining the reasons the administration has not chosen to enact any changes.

Regarding the establishment of taskforces, RPA recommends that taskforces have strict timelines and are specifically charged with recommending concrete and specific legislative, budgetary and administrative changes which can be enacted by the City of New York. These task forces should also incorporate a majority of members from communities which have been most affected by racism, discrimination and barriers to obtaining housing.

- Draft Plan Action 1.1.3: In the final report the administration should support City Council legislation, first put forward in 2017, specifically designed to help curb discrimination in housing cooperatives.
- Draft Plan Action 1.2.1: In the final report the administration should support the introduction of legislation to address housing discrimination based on residents' involvement with the criminal justice system.
- Goal 2: Gates submits proposed changes to the Draft Plan to facilitate equitable housing development, most notably to pursue a strategy of implementing MIH in wealthy housing markets. Gates additionally recommends the City pursue a fair share policy for affordable housing and pursue development of public land, particularly parking lots currently in use for City staff, near transit.
- Draft Plan Action 3.1.1: The administration needs, at the highest level, to explicitly commit to bringing all 175,000 units of public housing back to a state of good repair and put all available resources on the table to achieve this goal.
- Draft Plan Action 3.1.4: The final report should illustrate the specific policies it will enact to support mission-based groups.
- Draft Plan Action 3.1.6: The City should commit to expanding the basement legalization pilot citywide and build on it by exploring other ways to legalize and add housing in existing buildings.
- Draft Plan Action 3.2.1: Universal Access to Counsel should be expanded to include all current and former NYCHA developments, particularly those which have undergone or are undergoing PACT/RAD conversions.
- Draft Plan Action 6.1.1: The final report should require all City agencies to conduct equity assessments and develop equity action plans.
- Draft Plan Action 6.1.4: New York City should build on the community planning work conducted by HPD in Brownsville and Edgemere to conduct community planning in neighborhoods across the city and enact a more robust and fair comprehensive land use process based on this community planning process.

Response 12:

The final Where We Live NYC Plan includes key disparities to which each goal is responding, and key metrics to evaluate the success of each strategy. Additionally, actions have been edited to include more specific language so that the public may evaluate whether each action has been implemented. The number of actions that recommend future exploration of potential policy have

been reduced in response to public comment. Additionally, in response to public comment, the final Where We Live NYC Plan has eliminated Draft Plan Action 2.3.1 to form a Fairness in Land Use taskforce. This taskforce has been replaced in the final plan with a set of recommendations outlined in Goal 2, Strategy 1, including the implementation of MIH in new neighborhoods based on analysis of citywide trends in housing growth and loss, the availability of low-cost housing, and demographic changes.

Regarding additional actions noted by Gates:

- Draft Plan Action 1.1.3: Discrimination on the basis of protected characteristics by co-op associations is illegal under current law. This action has been modified to propose that CCHR will publish legal guidance to educate co-ops and applicants about their obligations and rights under the New York City Human Rights Law.
- Goal 2: Significant changes to the proposed actions of Goal 2 have been made in response to public comment.
- Draft Plan Action 3.1.4: See Response 3.
- Draft Plan Action 3.1.6: See action 2.1.1 in the Final Plan.

Comment 13:

Jacquelyn Simone, a Policy Analyst for the Coalition for the Homeless, notes that the legacy of discriminatory policies is manifested in the fact that people of color and people with disabilities are disproportionately affected by homelessness. Simone commends the Draft Plan's comprehensive and frank assessment of the past and current barriers to fair housing but points out several places in the report that appear to be inaccurate or imprecise. In addition, Simone recommends:

- Draft Plan Action 1.1.2: Pair efforts to expand resources that combat source-of-income and other forms of discrimination with outreach to ensure voucher-holders are aware of their rights and remedies.
- Draft Plan Action 1.2.1: Affirmatively prohibit housing discrimination based on criminal justice involvement.
- Draft Plan Action 1.2.3: Prohibit consideration of credit history for prospective renters using vouchers, and curtail the use of credit history for all other renters. Soften the requirement that prospective tenants have an income of 40 times the monthly rent.
- Draft Plan Action 2.3.3: Increase housing options for homeless and extremely low-income households, including on developments on NYCHA land and in amenity-rich neighborhoods, using required set-asides for these vulnerable New Yorkers.
- Draft Plan Action 2.3.3: Recommends that any changes to project-based vouchers be structured as a bonus to affordable and supportive housing developers that build in amenity-rich neighborhoods without reducing the subsidy value for developments that are not located in amenity rich neighborhoods.
- Draft Plan Action 2.3.1: Ensure that any changes proposed by the Fairness in Land Use task force still allow the City to site necessary facilities such as shelters that are often resisted by community members.
- Draft Plan Action 2.4.3: Take further steps to ensure that New Yorkers who are not citizens are able to access housing programs, making City-funded rental assistance programs available regardless of immigration status.

Response 13:

Errors pointed out by Simone have been corrected in the final report.

- Draft Plan Action 1.1.2: New protections and enforcement resources to combat source of income discrimination listed in Goal 1 of the Draft and Final Plan are coupled with new resources and education for voucher-holders listed in Goal 4 of the Draft and Final Plan.
- Draft Plan Action 1.2.1: See Action 1.1.1 in the Final Plan.
- Draft Plan Action 1.2.3: See Response 11.
- Draft Plan Action 2.3.1: See Response 12.

Comment 14:

Fred Freiberg, Executive Director of the Fair Housing Justice Center (FHJC), recommends that the final plan provide a comprehensive review of NYC's laws, regulations, and administrative policies, procedures, and practices. FHJC believes the City did not adequately partner with fair housing technical experts during the community engagement process. FHJC states that the plan failed to gather and analyze data on fair housing enforcement and discrimination complaints. FHJC states that addressing fair housing should be a regional approach and the plan should provide more comprehensive data on the intersectional impact of fair housing issues. FHJC believes New York City's policies and programs perpetuate barriers to housing choice such as enforcing ADA requirements in buildings receiving development subsidies.

FHJC made the following recommendations:

- Address co-op discrimination by passing a co-op disclosure law and advocate that the State enact and enforce a similar law.
- Pass legislation protecting formerly incarcerated individuals from discrimination in the housing market.
- Expand the HPD mobility assistance pilot and explore a regional mobility program.
- Revise the Qualification Allocation Plan (QAP) to provide more points for projects in low-poverty areas.
- Suspend the Community Board preference policy.
- Reevaluate off-site Inclusionary Housing to determine if it advances fair housing and adjust Mandatory Inclusionary Housing to ensure equitable distribution of affordable units.
- Institute an income distribution requirement for individual buildings within all new subsidized developments and commitment from developers that amenities in buildings that require a regulatory agreement with the City must be accessible to all tenants.
- Adopt a comprehensive planning process.
- Substantially increase funding for the New York City Commission on Human Rights to address discrimination in the housing market, improve response times, and create an accessible, efficient, and timely process for addressing complaints.
- The Council should explore what it would take to make the City Human Rights Law "substantially equivalent" to the federal Fair Housing Act so that the City can take advantage of additional federal funding that would be available.
- Provide general financial support to the FHJC, the only full-service fair housing organization based in New York City, to implement systemic testing investigations, carry out training and educational activities, and continue its fair housing enforcement work.
- Amend the Human Rights Law to require all City agencies engaged in housing and com-

munity development activities to “affirmatively further fair housing” and take no action that is materially inconsistent with this obligation.

FHJC additionally submitted four appendices to their testimony:

- Appendix A: Review of FHJC Recommendations
- Appendix B: Partial List of FHJC Cases and Investigations
- Appendix C: Closing the Divide: Creating Equitable, Inclusive, and Affordable Communities, a shared policy agenda developed by the Regional Affordable & Fair Housing Roundtable
- Appendix D: FHJC Low Income Housing Tax Credit Report

Response 14:

Chapter 6 of the Where We Live NYC Plan has been revised to include more specific actions and metrics for success. The Where We Live NYC Plan includes significant analysis of the impact of current laws, regulations, and administrative policies, procedures, and practices, and Chapter 6 includes concrete recommendations for changes based on that analysis. Analysis of existing policies, procedures, and practices was conducted in partnership with the Fair Housing Stakeholder Group and Government Partnerships as described in Chapter 4.

HPD hired new staff with expertise in fair housing policy and law to complete this project and created a new Fair Housing Policy Unit within the Office of Policy and Strategy. HPD partnered with technical experts, including FHJC, through the Fair Housing Stakeholder Group. Before launching the Stakeholder Group, FHJC and other fair housing technical experts were given the opportunity to suggest participants who should be included, and all such parties were invited to join the Stakeholder Group. HPD met with FHJC and other fair housing technical experts in every phase of the project described in Chapter 4, and FHJC and other fair housing experts were given the opportunity to comment on the structure and content of the Stakeholder Group workshops in advance of each phase. Regarding public outreach, HPD prioritized identifying a contractor with expertise in conducting inclusive community engagement processes. Through this contractor, HPD partnered with community-based organizations with deep connections to communities impacted by fair housing issues and who could reach many groups typically not engaged during planning processes. Engagement activities and materials created in partnership with these groups were reviewed by fair housing technical experts, including FHJC.

Regarding the recommended changes to the Fair Housing Plan:

- Discrimination by co-ops and against justice-involved individuals: see Response 12 and the revised Goal 1 in the Final Plan.
- Expansion of the HPD Mobility Assistance Pilot: See Final Plan Action 4.1.3.
- Comprehensive planning: Comment noted. See Response 12 and revised Goal 2 in the Final Plan.
- Increase funding to CCHR: See Final Plan Action 1.1.5.
- See Response 32 regarding the Regional Affordable & Fair Housing Roundtable.

Comment 15:

David Tipson, representing New York Appleseed, notes that contributing factors to fair housing issues are not prioritized and do not appear to be significantly integrated into the fair housing plan where those factors are intended to be addressed. The Draft Plan does not have metrics and milestones for determining what fair housing results will be reached with each goal. According to Tipson, the Assessment of Fair Housing created by the City of Los Angeles provides examples of how to address these concerns. Some of the actions in the Draft Plan are not supported by analysis in the body of the report, and some of the analysis in the body of the report do not have corresponding actions in the Plan.

The testimony provides several recommendations, including:

- Include a discussion of discrimination by co-op boards in the analysis sections of the Draft AI. Change Draft Plan Action 1.1.3 to read “Work with City Council in 2020 to pass effective legislation to require disclosure of the reasons that a co-op board rejects an otherwise qualified applicant for housing.”
- Support the full recommendations of the School Diversity Advisory Group.
- Include a comprehensive analysis of MIH, its goals, its role in the City’s efforts to affirmatively further fair housing, its successes, and areas where the program can be improved. Increase the use of MIH in high-amenity neighborhoods and ensure off-site housing build under MIH is located in school districts with lower student poverty rates.
- Provide a deeper historical account in Chapter 2 of the history of anti-black racism in New York City, beginning with the existence of slavery in the city and including the draft riots of 1863. Include an action to support funding for organizations that provide public education on the role of slavery in New York City.

Response 15:

Contributing factors to fair housing issues were prioritized in collaboration with the Fair Housing Stakeholder Group and their prioritization formed the basis for the six goals described in Chapter 6. This has been further clarified in Chapter 4 and Chapter 6 in the final plan, and additional materials from the Fair Housing Stakeholder Group are included as appendices in the Final Plan. Additionally, new “key disparities” have been added to Chapter 6 that connect the fair housing goals to underlying contributing factors (see Response 12).

Regarding specific recommendations in the testimony:

- Discrimination by co-op boards: see Response 12 and the revised Goal 1 in the Final Plan.
- Recommendations of the School Diversity Advisory Group: comment noted.
- MIH: see Response 12 and revised Goal 2 in the Final Plan.

A deeper historical account of the history of anti-black racism in New York City, beginning with the existence of slavery in the city and including the draft riots of 1863, was added to Chapter 2 in the Final Plan.

Comment 16:

Paul Epstein of Northern Manhattan is Not For Sale submitted written testimony stating:

- The Where We Live Draft Plan used “perverse data” that overstates the progress claimed

on integration and the decline of concentrated poverty by masking how displacement of low-income people has in fact given rise to those statistics. MIH policy has focused on upzoning low-income neighborhoods to usher in large numbers of market rate units alongside “so-called” affordable ones. Epstein recommends that all rezonings require racial impact analyses and that the City focus on increasing housing opportunities for low income people of color in wealthy, white neighborhoods.

- The City should adopt “Neighborhood Income Distribution” (NID) in place of Area Median Income (AMI) to mitigate or eliminate the disparate impact created when HPD term sheets peg affordability measures to incomes from much wealthier areas.
- The plan should include more explicit details for implementing a citywide fair housing strategy, including affordable housing development in all neighborhoods rather than targeting a dozen low-income ones for rezoning. MIH could be used in wealthier neighborhoods with little risk of gentrification, whereas 100% affordable housing on public sites, CLTs, and robust preservation efforts could be used in low-income ones prior to any rezoning actions there.
- The plan should call for robust community engagement, including efforts to include, and facilitate dialogue between, people with different, potentially opposing interests.
- The plan should call for comprehensive planning to provide a citywide framework for fair, equitable, and affordable housing strategies. The Thriving Communities Coalition provides such an example.
- The plan should track a robust suite of community equity indicators, including indicators of opportunity and community well-being such as health, education, and economic stability. Community engagement should be used to determine specific equity indicators that New Yorkers find most relevant, in addition to indicators tested in other jurisdictions.

Response 16:

See Responses 3, 10, and 12 as well as revised Goal 2 in the Final Plan.

Comment 17:

Jeanne Ruskin, a member of Inwood Legal Action, submitted written testimony supporting the comments of Paul Epstein, stating that discriminatory displacement of underprivileged and minority populations continues to be unacknowledged and addressed, despite the otherwise cited statistics and claims of “affordability” and fairness.

Response 17:

See Response 16. The Where We Live NYC Final Plan and accompanying materials acknowledge discrimination and displacement and make a number of commitments around addressing these issues.

Comment 18:

Elizabeth Kocienda, Director of Advocacy at the Civil Rights Committee of the New York City Bar, offered written testimony stating that:

- The Draft Plan does not chart a meaningful course to affirmatively furthering fair housing in New York City. Specifically, the Plan did not adequately discuss the contributing

factors to segregation, which factors the Draft Plan's goals were designed to address and in what priority, or what metrics would be used to measure performance relative to those goals. The Draft Plan's actions are vague, noncommittal, and not timebound. The City has neither put forth a working definition of an integrated neighborhood, nor adequately explained what problems it is solving for. Solutions are not always responsive to analysis, and vice versa.

- There is an absence of expert opinion reflected in the Draft Plan, including that concerning the City's community preference policy, as well as school integration. The Bar recommends that the Final Plan include the suggestions made by fair-housing and integration experts, note the ongoing community preference litigation and provide links to publicly available court documents, replace recommendations on school integration with a single action to "explore adoption of the School Diversity Advisory group's Making the Grade report," and include a new action to fund the testing of the Fair Housing Justice Center and double resulting enforcement actions.
- The plan does not meaningfully examine the initial successes or failures of MIH or suggest ways in which the program could be improved, including implementing rezonings in high-amenity neighborhoods with particular attention to educational opportunity. Similarly, the plan does not meaningfully examine the possible benefits of mobility programs.

Response 18:

See Responses 12, 14, and 15.

Comment 19:

Jack Mullan from the Citizens' Committee for Children of New York (CCC) offered written testimony in support of the Draft Plan and in order to amplify the importance of integrating the perspectives and needs of children and families experiencing housing insecurity. Family homelessness is at the intersection of racial/ethnic and gender-based discrimination, and communities with greater rates of shelter entry are the same areas that bore the brunt of government disinvestment over decades. CCC's own research and community-based assessments concur with the Plan's findings on lack of housing affordability and poor or overcrowded conditions, and highlight a pressing need for widely publicized, language-accessible workforce development, and childcare supports, as well as reliable transportation options.

CCC recommends that the plan:

- Invest in family support services to prevent shelter entry, promote child well-being, and strengthen post-shelter vouchers. Specifically, they advocate a three-million-dollar City Council initiative to address the link between housing instability and chronic absenteeism in public schools, as well as Intro 146, which increases the value of CityFHEPS vouchers to 100% of the fair market rent.
- Increase involvement of non-profit partners in making communities aware of government services such as Universal Access to Counsel and Homebase.
- Advocate for adequate resources and amenities in low-income neighborhoods, delivered by community-based resources. CCC asserts that low-income residents do not necessarily need to move to wealthier neighborhoods to thrive, so long as resources and amenities in their own neighborhood are sufficiently available to meet their needs.

- Combat housing discrimination and exploitation in all forms – including families transitioning from shelter to permanent housing using rental vouchers, and immigrant families in severely overcrowded conditions.
- Increasing the frequency and geographic granularity of the Housing and Vacancy Survey, with a larger sample, and specific questions about affordability and displacement.
- Make publicly available data on conditions, length of stay, and demographics of the shelter population based on the facility type in which they stay – as well as the breakdown of shelter exits by voucher and housing type.

Response 19:

Comments noted.

Comment 20:

Beth Finkel, State Director of AARP New York, submitted written testimony commending the Plan’s inclusion of analysis of the housing challenges faced by seniors, particularly seniors of color, which are also identified in AARP’s 2019 report entitled *Disrupt Disparities 2.0: Solutions for New Yorkers Age 50+*. AARP supports the Plan’s strategies of preserving affordability for residents; protecting tenants facing eviction and harassment; protecting homeowners vulnerable to displacement, fraud and scams; increasing the number of affordable homes that are accessible; improving household financial security and wealth-building opportunities; making the public transportation network more equitable and accessible; and enabling mission-based groups like Mutual Housing Associations and Community Land Trusts, to create and preserve affordable housing.

Response 20:

Comments noted.

Comment 21:

Lourdes Rosa-Carrasquillo, Director of Advocacy for The Center for Independence of the Disabled (CIDNY), offered written testimony that applauded the Draft Plan’s efforts but cautioned that the Plan’s focus on racial inequity failed to understand the differences in rights granted to people with disabilities who experience discrimination. Reasonable accommodations and modifications are often necessary to ensure a disabled person’s equal opportunity to housing, and denial of these accommodations leads to homelessness or institutionalization. Rosa-Carrasquillo supports the Plan’s strategy for more funding for paired testing, as well HomeFix, and stresses that NYCHA capital repairs must abide ADA requirements. Further, Rosa-Carrasquillo supports increasing rental subsidies for accessible housing. Rosa-Carrasquillo feels language should be included to specify that new housing units be accessible, and that trainings for stakeholders, including HPD contractors, should include the history of discrimination against all protected classes. Rosa-Carrasquillo feels tracking and annually publishing data on affordable housing should note whether it is accessible and integrated. Rosa-Carrasquillo supports conforming the NYC Human Rights Law protections around source of income discrimination with those under the NYS Division of Human Rights Law. Rosa-Carrasquillo requests that the tristate working group should include diverse, community-based representation. Finally, Rosa-Carrasquillo strongly urges that the Plan avoid the terms “vulnerable” and “special needs population,” as they imply that the disabled community needs something other than equal rights.

Response 21:
Comments noted.

Comment 22:

Rachel Fee, Executive Director of the New York Housing Conference (NYHC), submitted written testimony expressing support for many of the strategies outlined in the Plan, but urged that some go further in defining barriers to, and identifying specific policies that would further, fair housing. NYHC suggests some of the strategies were too broad and the final report should describe actionable goals with detailed metrics.

Actions NYHC call out for support include:

- Restricting the use of middle-income options under 421-a in neighborhoods where the market is creating new housing without the tax break
- Creating a regional working group to develop a shared housing and transit agenda
- Exploring legislation to fight housing discrimination based on residents' involvement with the criminal justice system
- Using neighborhood level data on race and social equity to evaluate and guide capital planning, and ensuring community-based planning processes, like the Brownsville Plan, continue in neighborhoods that have experienced historic disinvestment
- Accelerating land use review processes for affordable housing development, including removing the cap on FAR and looking at historic districts
- Increasing housing opportunities in amenity-rich neighborhoods using project-based vouchers
- Addressing public housing conditions under a fair housing strategy.

Examples of actions that could be strengthened include:

- Coming out in favor of specific legislation to address discrimination by co-op boards
- Specifying the scale and budget for fair housing enforcement measures, such as testers, and source of income discrimination enforcement
- Setting strict timelines on the zoning and land use task force and charging them with developing concrete regulatory changes to increase zoning flexibility which will encourage added supply affordable rental housing.
- Expand mobility counseling and set goals to reduce the use of vouchers in high poverty neighborhoods

Response 22:

See Response 12 and revised Goals 1 and 2 in the final plan. Regarding expansion of the HPD Mobility Assistance Pilot: See Final Plan Action 4.1.3.

Comment 23:

Bruno Daniel Garcia, a representative of Communities Resist, a project of Southside United HDFC, offered written testimony stating that the Draft Plan drew the wrong conclusions from the community feedback it received and fell short on useful proposals to address housing segregation. Daniel Garcia is skeptical of the City's over-reliance on rezonings and the private market as the solution to affordable housing and fair housing, and support making racial impact stud-

ies a mandatory piece of them in order to mitigate disparate impact. Daniel Garcia encourages comprehensive city-wide planning that centers racial equality and community self-determination,” emphasizing that “it is just as important to New Yorkers to desegregate protected white, wealthy communities as it is fight gentrification and displacement in long term immigrant, working-class communities of color.” Daniel Garcia is skeptical of the Draft Plan’s recommendation to fast track land use actions in high-opportunity neighborhoods, as “high opportunity” is too ambiguous a term. Finally, Communities Resist supports legislation ending the warehousing of rent stabilized housing, the proliferation of illegal hotels, and exploitation of the Loft Law. In summary, Communities Resist believes the fight to affirmatively further fair housing must center on racial, economic equality and an anti-gentrification, anti-displacement framework.

Response 23:

Regarding “high opportunity” neighborhoods, the Draft and Final Plan use a framework of “amenity rich” areas in order to avoid a conflation of the concentration of low-income residents with a lack of opportunity. Amenity-rich areas have resources such as diverse and thriving public schools, ample access to public transit, low rates of violent crime, and other services and institutions that support community well-being. See Response 12 and revised Goal 2 regarding rezonings, comprehensive planning, racial impact analyses, and the desegregation of high opportunity neighborhoods. See Goal 3 for strategies and actions included in the Draft and Final Plan related to preventing displacement in low-income and immigrant communities of color.

Regarding legislation to end the warehousing of rent-stabilized housing, the proliferation of illegal hotels, and exploitation of the Loft Law, comments noted.

Comment 24:

Julia Duranti-Martinez, a representative of the NYC Community Land Initiative, submitted written testimony in support of the Draft Plan’s inclusion of Community Land Trusts (CLTs) and Mutual Housing Associations (MHAs) and offered the following recommendations for specific, actionable steps that the City could take to expand CLTs and social housing led by low-income New Yorkers and communities of color.

- Support CLT acquisition of City-owned property for permanently and deeply affordable housing, and other community needs, including preferential consideration in RFPs for public land
- Support CLT acquisition of private properties, including prioritizing non-profits for the disposition of properties through TPT, and support legislation to enable tenant purchase of property
- Develop new funding streams to support deep affordability on CLT land such as been done in other cities like Baltimore and Oakland, and possibly shift spending from shelters to deeply affordable housing on CLTs
- Support CLT education, organizing, and leadership development
- Support CLTs along with other initiatives that promote cooperative and community ownership over housing, jobs, energy, and finance.

Response 24:

See Response 3. The City of New York currently supports education, organizing, and leadership

development of CLTs through the City Council Community Land Trust Initiative, which funds capacity-building activities of CLT organizations across the city. Comments noted regarding CLT acquisition of private property and new funding streams to support deep affordability on CLT land. See also Response 3 regarding shared equity initiatives.

Comment 25:

Paimaan Lodhi, Senior Vice President at the Real Estate Board of New York (REBNY), submitted written testimony on behalf of REBNY and in support of the Plan's goals and objectives, and many of the accompanying actions, including steps the real estate industry can take such as training staff on the diverse needs of tenants, construction of accessible housing, consideration of innovative housing typologies, and facilitating housing inspections. REBNY believes the goals should be accompanied by strong enforcement, accountability, and transparency. Specific comments are outlined as follows:

- Goal 1: REBNY supports the plan's recommendations to combat discrimination with expanded protections and enforcement. REBNY stressed that these efforts must be balanced with owner's property rights.
- Goal 2: To facilitate equitable development, REBNY encourages the incorporation of local perspectives, creating regional planning groups, expanding the Housing Vacancy Survey (HVS), addressing barriers to producing enough housing to keep up with need, as well as addressing community board practices and accessibility. Additionally, REBNY supports:
- Removing the State cap on residential floor area ratio, evaluating the gentrification impacts of future proposed landmarking actions, and reconsidering the limitations on the transfer of a landmark's unused development rights to adjacent sites.
- Reform of the property tax system resulting in inequitable financial burden on multifamily rental buildings.
- Continuation of 421-a to encourage housing production in a high-cost, high-tax environment and encourage economic integration in high-income neighborhoods.
- Upzoning of neighborhoods with underutilized transit stations.
- Training and education of building staff to guarantee all tenants' needs are met but the cost and capacity burdens of these trainings should not be placed solely on owners.
- Goal 3: REBNY believes that preserving affordable housing and preventing displacement are important aspects of fair housing, and supports the concept of proactive inspections, but cautions that owners whose tenants refuse access to apartment not be unfairly punished. REBNY also supports expanding Universal Access free legal services for tenants facing eviction in Housing Court and NYCHA proceedings. REBNY cautions that duplication in existing City processes and programs sows confusion and inefficiency, citing as an example multiple agencies/initiatives dedicated to combatting harassment, such as the Office of Tenant Advocate, Department of Buildings, the Mayor's Office to Protect Tenants, the Tenant Harassment Prevention Task Force, and the Tenant Harassment Unit.
- Goal 4: REBNY supports the expansion of rental voucher programs as a proven cost-effective method to prevent eviction and displacement, such as NYS Senator Hevesi's Housing Stability Support bill. They point out that, for a program to be successful and widely adopted by landlords, it must address bureaucratic inefficiencies and offer timely and competitive payments.
- Goal 5: REBNY strongly supports reducing barriers to accessible housing and integrated

living options, and believes the creation of a taskforce and web portal is an appropriate step, in addition to making sure that owners are recouped for their investments in accessibility accommodations.

- Goal 6: REBNY largely supports the Plan's proposed actions to address neighborhood-based legacies of discrimination, particularly capacity building at City agencies to provide bridge programs, job training, and financial counseling. Further, REBNY believes activating under-used public spaces will promote health and safety.

Response 25:

Comments noted.

Comment 26:

Ivy Perez offered written testimony on behalf of the Center for New York City Neighborhoods (CNYCN) in support of policies and programs that preserve working- and middle-class homeownership opportunities that stabilize diverse, strong neighborhoods. Noting a persistent, worsening, and inter-related racial wealth and homeownership gap that leaves Black and Hispanic families behind their White and Asian counterparts, CNYCN calls for increasing access to affordable homeownership supported by housing counseling and legal services targeted to communities of color. CNYCN seconds the Plan's calls for advocacy around improvements to CRA, and endorsements of programs for homeowners at risk of foreclosure, such as basement legalization, foreclosure prevention, home repair programs, and estate planning. They also support the use of Community Land Trusts and other forms of shared equity where the City can invest in homeownership at scale.

CNYCN called for the City to evaluate the racial impacts of City-led programs that disproportionately affect homeowners of color and thus may exacerbate the homeownership and racial wealth gaps, such as the tax lien sale, and the property tax system in general.

To remove barriers to homeownership for families of color, CNYCN calls on the City to reform the mortgage recording tax (MRT), which places a disproportionate burden on black buyers who are less likely make cash purchases and tend to have higher mortgages; one suggestion is to eliminate the MRT for condos and small homes. Further, CNYCN advocates further increasing the maximum loan amount of its HomeFirst down payment assistance to \$100,000, to keep buyers of color competitive in the marketplace.

Response 26:

Comments noted.

Comment 27:

Chris Walters, Rezoning Technical Assistance Coordinator at the Association for Neighborhood & Housing Development (ANHD), offered written testimony on behalf of ANHD and in support of the Draft Plan's extensive and thorough analysis but advised the City commit to a bolder course of action and more specific, measurable goals and timelines. ANHD calls for "specific [detailed] commitments to a new development and planning agenda that centers racial equity and social justice," and requires both low-income and wealthier neighborhoods to be rezoned to allow for

the creation of truly affordable housing.

- Goal 1: ANHD supports the recommendations in this section but calls for more specificity on the scope and focus of testing, what the City will do to protect those involved in the criminal justice system from housing discrimination, and more forceful action with regard to enforcing source of income discrimination
- Goal 2: Comments on actions:
 - Seeks clarity on AMI levels, percentage of units, and applicable geographies of the proposal to expediting the land use review process for affordable housing, and believes it is most effective as a tool in high-wealth neighborhoods.
 - Believes historic districts need to take their share of density, which includes affordable housing.
 - Recommends racial impact studies as part of land use analyses and including City Environmental Quality Review (CEQR) reform with the goal of improving measures of residential and small business displacement.
 - Recommends more resources for training community boards and elected responsibilities on their responsibilities to affirmatively further fair housing.
 - Supportive of recommendation to expand the Housing Vacancy Survey.
 - Provide more clarity on the metrics and commitments with associated redeveloping underused public properties, including on NYCHA land, in amenity rich neighborhoods.
 - Provide more clarity on how HPD evaluates and allocates the use of project-based vouchers.
- Goal 2 - ANHD says the following items are missing from Goal 2:
 - Comprehensive Planning.
 - CEQR reform to address changes in methodology and processes.
 - An analysis of the demographics and markets where MIH has been applied.
- Goal 3 – Comments on actions:
 - Commit to specific strategies & accompanying resources to support mission-driven development, including public land disposition, support to expand CLT's, opportunities to preserve at-risk affordable properties, and opportunities to acquire unsubsidized housing in order to preserve long-term affordability. Commit to expansion of ADU legalization and support swift implementation of RTC expansion.
 - The City should commit to implementing an expanded and improved citywide CONH program, incorporating lessons learned from the pilot program.
 - The City should commit to continued funding for tenant organizing through Partners in Preservation and/or similar programs that provide resources to CBOs.
- Goal 3: ANHD says the following items are missing:
 - Expanding down payment assistance, developing assessments of displacement risk, and fully implementing the Stand for Tenant Safety legislation.
- Goal 4: The expansion of resources for addressing discrimination based on source of discrimination needs to be more specific.
- Goal 6: More specificity around the equity assessments and other actions in this section; ensuring the that fair housing goals are incorporated into planning and budgeting decisions; providing more City support to develop better and stronger CRA eligible tools.
- Goal 6: ANHD says the following items are missing:

- How to create local jobs, how to ensure local hiring opportunities, assessment of local economies following rezonings, integrating labor market analysis into use process, partnerships with EDC.

Response 27:

See Responses 3, 10, 12, 14, and 15.

Comment 28:

Sabine Aronowsky, a representative of the Gowanus Neighborhood Coalition for Justice (GNCJ), offered written testimony on behalf of GNCJ and in support of the Draft Plan's goals to address the legacy of housing discrimination, but urged the City to make more explicit commitments and policy recommendations and to track the progress of each. GNCJ makes the following recommendations:

- Goal 2:
 - Require 100% affordability on publicly owned land and provide the subsidies necessary for permanent and deeply affordable units (<60% AMI).
 - Mandate deeper Mandatory Inclusionary Housing (MIH) levels (MIH Options 1 and 3).
 - Establish a lottery preference for public housing residents, low-income residents and families displaced from their community.
 - Focus City-sponsored, neighborhood-wide land-use actions in communities where there is high opportunity, limited to no displacement risk and where MIH can work without subsidy. Stop neighborhood-wide rezonings in lower-income communities of color.
 - Build economic equity to ensure local access to Section 3 employment.
 - Provide funding and programming for the know-your-rights, anti-harassment trainings, and other building related trainings designed for public housing residents
- Goal 3:
 - Provide upfront funding for full capital needs at NYCHA developments, beyond those articulated in NYCHA 2.0.
 - Study, implement and enforce transfer of development rights to fund full capital repairs at NYCHA developments.
- Goal 4:
 - Provide Section 8 vouchers to local NYCHA residents to access newly created affordable housing and those at risk of homelessness.
 - Ensure high quality housing in rental assistance benefits programs.
- Goal 6:
 - Support and reopen community centers in NYCHA developments.
 - Invest in community health and social resiliency by performing combined Racial Equity Impact Assessment and Community Health Needs Assessment.

Response 28:

See Responses 2, 4, 7, and 12.

Comment 29:

Philip Simpson, a representative of Northern Manhattan is Not for Sale, offered oral testimony

criticizing two main issues in the Draft Plan: a lack of analysis regarding homeless school children and a lack of community-driven planning. First, Mr. Simpson notes that the 'Where School Children Live' section of the draft report should be updated to include an analysis of the intersection between homelessness and school children, particularly because of the highly racialized quality of homelessness (and particularly of homeless children) in New York City. Second, he criticized the current and prior administrations for ignoring community-generated plans, citing Bushwick, Chinatown, and Inwood as recent examples. To make this point, he quoted Barika Williams' editorial published in City Limits: "While the city convenes its taskforce, will it continue to target low-income communities of color for upzonings while ignoring community-generated plans?" Overall, Mr. Simpson reports finding the Draft Plan's recommendations disappointing, and echoes Ms. Williams' conclusion that further exploration and taskforces amount to merely small tweaks to the status quo when more radical change is needed.

Response 29:

See Response 12 regarding taskforces and land use changes. Regarding data on homeless school children, the reporting includes an analysis of the disparities of homelessness and housing instability among children in the school system in the "Disparity Snapshot" of Chapter 5.

Comment 30:

Dan Miller, a board member for Open New York, offered oral testimony commending the spirit of the Draft Plan, but noting that it does not go far enough to address the city's affordability, sustainability, and integration problems. Open New York urges the Plan to rezone more, integrate more, build more housing – both market-rate and affordable, build more in the richest neighborhoods, and prevent displacement in the poorest neighborhoods. Specifically, Open New York offered the following recommendations: 1) upzoning the richest neighborhoods (for example, SoHo and NoHo) to fulfill the promise that the MIH program has failed to do so far; 2) sell off air rights and use the proceeds to fund more public housing; 3) fix the deficiencies that NYCHA has.

Response 30:

See Response 12 and revised Goal 2 regarding rezonings, integration, and housing growth. Regarding NYCHA air rights and deficiencies, see revised Goal 3 Strategy 1 and associated actions in the Final Plan.

Comment 31:

Maxwell Cabello, a representative of Churches United for Fair Housing (CUFFH), offered oral testimony urging for change in the way that land use decisions are made and for a bigger and deeper commitment to the communities that are most at risk of being displaced. CUFFH recommends several changes to strengthen the Draft Plan: 1) implement a racial impact study; 2) address NYCHA's shortfalls by implementing public value recover policies, and providing more autonomy and ownership for NYCHA residents to make and influence decisions being made on their land; 3) implement additional strategies to address housing needs of the lowest-income New Yorkers; and, 4) increase commitment to publicly and transparently monitor future progress via indicators. Additionally, CUFFH would like to see more outspoken and firm support for policies and legislation, as well as budgetary commitments, for other city-wide housing policies, including: the elimination of single-family zoning, a commitment to legalizing basement apart-

ments (which the Mayor recently spoke about), and budgetary commitments to Community Land Trusts as well as other housing strategies that aren't broadly being deployed by the City today.

Response 31:

See Responses 3 and 12. Regarding single-family zoning and basement apartments, see Action 2.1.1 in the Final Plan.

Comment 32:

Elizabeth Ginsburg, Senior Program Officer for Policy and Communications in the New York Office of Enterprise Community Partners submitted written testimony. Ginsburg notes that in 2017 Enterprise co-convened a Regional Affordable and Fair Housing Roundtable in partnership with the Fair Housing Justice Center comprised of affordable housing, community development, and fair housing organizations. The roundtable debuted a shared policy agenda in 2019 which included that should inform the Final Plan, including:

- Increasing resources for enforcement of source of income discrimination,
- Expanding State and local protected classes to include arrest and conviction records,
- Addressing exclusionary zoning and other land use barriers, and
- Maximizing density.

Additionally, Ginsburg recommends that the City and State come together to establish a joint plan to fund NYCHA. Finally, Ginsburg supports the inclusion of expanding the Landlord Ambassador program in the Draft Plan.

Response 32:

The Where We Live NYC Final Plan supports many of the key tenets of the 2019 Regional Affordable and Fair Housing Roundtable policy platform including:

- Improving tenant protections (see Goal 3);
- Creating a State-wide Equitable Share Housing Plan (see Final Plan Action 2.1.6);
- Encouraging increased density for affordable housing (see Final Plan Action 2.1.4);
- Maximizing the benefits of MIH (see Final Plan Action 2.1.2);
- Expanding housing supply by legalizing basement apartments and increasing accessory dwelling units within suburban areas (see Final Plan Action 2.1.1);
- Increasing resources for enforcement of source of income protections (see Final Plan Actions 1.1.4 and 1.1.5); and
- Expanding state and local protected classes to include "Arrest and Conviction Records" (see Final Plan Action 1.1.1).

Comment 33:

Jennifer Gutierrez provided oral testimony on behalf of Council Member Antonio Reynoso (34th district, covering parts of Williamsburg and Bushwick in Brooklyn, and Ridgewood in Queens), urging that the City go further than the recommendations currently outlined in the Draft Plan. To begin to address segregation and improve socioeconomic outcomes, Council Member Reynoso recommends building affordable housing in high-opportunity neighborhoods rather than exclu-

sively rezoning low-income neighborhoods of color. He is critical of land use policies that require an individual Council Member's support; this allows them to refuse to accept affordable housing developments, which violates the essence of fair housing laws. Bushwick, for example, is one of the most rapidly gentrifying neighborhoods in the city and is part of his district. In Bushwick, there are almost no city-owned sites on which to build affordable housing, MIH has not been mapped anywhere in the neighborhood, the supply of rent-regulated housing is very limited, and very little affordable housing has been built in the neighborhood in the past 10 years. The neighborhood put forth a plan to mitigate some of the impacts of development pressures in the neighborhood while creating new affordable housing, but the City did not accept it. He notes that, if socioeconomic trends in Bushwick continue, the people that worked to uplift the community after decades of disinvestment will no longer have access to it. In collaboration with the advocate community and council colleagues, Council Member Reynoso is working on creating a plan that goes further than the recommendations in the Where We Live NYC Draft Plan.

Response 33:

See Response 12 and revised Goal 2 regarding increased density in high opportunity neighborhoods and changes to land use processes. See Response 10 regarding community planning.

Comment 34:

Daniel Carpenter-Gold, Staff Attorney at TakeRoot Justice, provided oral and written testimony highlighting the organization's concerns about strategies in the Draft Plan. TakeRoot Justice notes that the Draft Plan's strategies include several efforts to accelerate, rather than reign in, new developments, which involves sacrificing community control over local land use for the sake of unspecified housing developments that are insufficiently affordable. The organization cites Draft Plan Action 2.1.1 as an example of a concerning change because it seeks to remove processes that protect communities and community control over their own neighborhoods. Another area of concern for TakeRoot Justice is the privatization of NYCHA without regard for NYCHA residents' objections, and without guarantee that NYCHA residents would be protected from the practices of their future private landlords. The organization is deeply concerned with the Draft Plan's refusal to acknowledge the bifurcated system of NYC housing policy between NYCHA residents and private housing residents. They argue that NYCHA residents receive fewer protections and City agencies that prevent poor conditions in other parts of the city refuse to provide inspection services to NYCHA residents or provide them on disparate terms. TakeRoot believes the split is in violation of the Fair Housing Act and recommends that the final Plan should name and provide solutions for this split. The organization does agree, however, with strategies in the Draft Plan that encourage the growth of Community Land Trusts and that aim to improve the conditions on NYCHA properties. TakeRoot Justice also recommends that HPD read its set of recommendations (titled "Inclusive City Strategies to Achieve More Equitable and Predictable Land Use in New York City") for ideas on how to make the Plan more equitable.

Response 34:

See Responses 10 and 12 and revised Goal 2 regarding community planning.

Comment 35:

Casey Berkovitz provided oral testimony praising the Draft Plan's overview of the history of

housing segregation in NYC but criticizing the Draft Plan for not quite living up to the legacy of discrimination that is laid out in the rest of the report. First, Mr. Berkovitz suggests looking to other cities and states for models of how to ensure that affordable housing is created in wealthy, high-opportunity neighborhoods. For example, California's RHENA system and the California Housing Accountability Act allow the state to overrule cities if they are putting up onerous regulations to avoid affordable housing. At a city level, this model could be applied to individual neighborhoods, possibly via council districts or community districts. Second, he recommends re-thinking community input in land use decisions. While local input is important, Mr. Berkovitz notes that Council Members essentially have the power to veto affordable housing developments and this power has been used in high-opportunity neighborhoods to deny affordable housing. He suggests incentives or ramifications for cases where this veto power is overused. Lastly, he observes that many of the wealthiest, highest-opportunity neighborhoods are located in historic districts. Mr. Berkovitz encourages the City to consider ways to incorporate more affordable uses of rental properties in the context of historical districts.

Response 35:

See Final Plan Action 2.1.6 regarding looking to strategies from other states like California's RHENA system and the California Housing Accountability Act. See Final Plan Action 2.1.5 regarding the impact of historic districts on housing availability. Comments noted regarding Council Member deference.

Comment 36:

Sheena Kang, Senior Policy Analyst at Citizen's Housing and Planning Council (CHPC) provided oral testimony praising the Draft Plan and offered the organization's help in making its goals and strategies become a reality. CHPC applauds the administration's focus on racial equity as a clear objective and believes that the Draft Plan can reinvigorate the concept of housing policy and affordable housing development as a crucial component of social justice. The organization also offers several criticisms of the Draft Plan, making the following recommendations:

- Orient policy measures towards the Plan's goals with tangible metrics for success.
- Increase access to data, such as the affordable housing lottery data, to gain a deeper understanding of who our affordable housing and/or affordable housing policies serve and how.
- Implement detailed zoning reform actions that will serve racial equity objectives – for example, New York City should follow other cities and outlaw single family zoning.
- Seize opportunity to add affordable housing supply in high-income amenity-rich neighborhoods – for example, through the SoHo and NoHo rezoning.

Response 36: See Response 12 and revised Goal 2. Regarding increased access to data, the Where We Live NYC report includes many new data analyses on the location of affordable housing and the occupants of various parts of the housing stock. The planning process also made data publicly available on the project's website. Data availability and privacy concerns prevent complete reporting of all desired information.

Comment 37:

Adrien Weibgen provided oral testimony praising the Where We Live NYC process for engaging

so many people across the city and for honestly reckoning with how we got to this place today and the problems that have been caused by administrations long before the current one. Weibgen offers support for tracking and publishing data on housing development and demographic and socioeconomic data to inform priorities in decision-making. Weibgen likewise offers support for developing standardized race and social equity tools to evaluate and guide the City's capital planning and budgeting processes. Were that to be implemented it would be a very radical shift from how the City has made its decisions to date. Weibgen recommends that these strategies be implemented in ways consistent with the recommendations of the Thriving Communities Coalition and legislation from Council Member Levin.

Response 37:
Comments noted.

Appendix D

Response to Public Comments Received in Advance of the Draft Plan

Introduction

Appendix D summarizes and responds to all oral and written comments received during the comment period related to the formulation of the draft of the City of New York’s Where We Live NYC Report. These consist of comments made at the public hearing held by the New York City Department of Housing Preservation and Development (HPD), the New York City Housing Authority (NYCHA), and the New York City Department of City Planning (DCP) and written comments submitted to HPD. The public hearing was held on Wednesday, June 12, 2019 at 120 Broadway. This public hearing was held in advance of the publication of the draft Where We Live NYC report to solicit feedback on priorities of what should be included in the draft. An additional public hearing will be held on February 6, 2020, to solicit feedback on the draft plan, and—as described in more detail on p.1 of this report—the public may submit comments on or before March 7, 2020, by mail or email as well.

Below is a list of individuals who provided comments at the June 12th public hearing or in writing. The organization and/or individual that commented are identified for each comment in the following section. These summaries convey the substance of the comments but may not necessarily quote the comments verbatim.

List of Individuals Who Provided Comment

1. Leo Asen, American Association of Retired Persons (AARP); oral and written testimony
2. Hilary Wilson and Susan Saegert, CUNY Graduate Center; oral and written testimony
3. Ron Friedman; oral testimony
4. Michael Higgins, FUREE; written testimony
5. Sabine Aronowsky, Gowanus Neighborhood Coalition for Justice; written testimony
6. Suhali Méndez, New York Lawyers for the Public Interest; written testimony

Comments and Responses

Comment 1:

Leo Asen from AARP testified that as the population of New York City is getting older and more diverse, one in five seniors are living in poverty and affordable housing is a top concern for New Yorkers aged 50 and above. Additionally, AARP research shows that New Yorkers of color have far less access to safe and affordable housing, and accessible transit opportunities, than other New Yorkers. Mr. Asen recommends that through the Where We Live NYC process the City: make housing more affordable and prevent displacement through inclusionary zoning policies; create accessible options for aging in place by facilitating local zoning ordinances that permit accessory dwelling units and promote universal design features; expand funding available to low-income older adults to make home modifications to promote accessibility; and increase transit and mobility options to promote accessibility.

Response 1:

The City of New York and NYCHA share the goals expressed by Mr. Asen to increase access to affordable and accessible housing for seniors and New Yorkers with disabilities. The Where We Live NYC report includes extensive analysis of the housing challenges faced by seniors and people with a disability. As Mr. Asen points out in testimony, New Yorkers with a disability face a particular challenge in the New York City housing market. The Fair Housing Plan included in the draft Where We Live NYC report includes numerous strategies to address this issue. One of the six goals in the Fair Housing Plan (Chapter 5) is to create more integrated and independent living options for people with disabilities, including seniors with a disability. Relevant strategies include efforts to fight discrimination against people with a disability seeking reasonable accommodations; a suite of actions to create more affordable and accessible housing in a range of neighborhoods, including amenity-rich neighborhoods; new education and information for individuals seeking accessible homes; expanded programs to provide funding for low-income seniors and people with disabilities to modify their homes to accommodate their physical needs; improved trainings for architects and developers on their legal responsibilities when designing and constructing residential buildings to ensure accessibility requirements are met.

Comment 2:

Dr. Susan Saegert, Professor of Environmental Psychology at the Graduate Center and Hilary Wilson, a PhD student in geography and graduate research assistant at the Graduate Center, City University of New York, testified that for people with disabilities and members of historically discriminated-against ethnic groups, the ability to remain in their homes and neighborhoods as they changed constituted an important aspect of fair housing. Thus, two goals of the Where We Live NYC project should be 1) to preserve affordable housing in gentrifying areas and 2) to expand the stock of affordable housing throughout the city. Further, Saegert and Ms. Wilson emphasize the important role of ownership and tenant-controlled affordable housing for groups that face discrimination in the housing market. Dr. Saegert and Ms. Wilson have conducted a statistical analysis of Census data comparing changes between 1990 and 2012 in rent, percent Black population, and a widely used index of gentrification as a function of percent permanently affordable housing in the census tracts. Their research finds that NYCHA, Limited Equity Cooperatives, and Mutual Housing Associations maintain the racial and ethnic diversity of the neighborhoods in which they are sited and that census tracts with higher densities of permanently affordable housing are associated with lower levels of rent increase since 1990. Further, they found that the density of permanently affordable housing was associated with an overall decrease in the likelihood that a given census tract would gentrify. Dr. Saegert and Ms. Wilson suggested the Where We Live NYC include two additional strategies: 1) preserve permanently affordable housing of all kinds in New York City paying attention to Limited Equity Cooperatives and Mutual Housing Associations as well as NYCHA developments and 2) develop new permanently affordable housing throughout the city including in high amenity neighborhoods. For each of these strategies, Dr. Saegert and Ms. Wilson suggest specific actions for the City to pursue.

Response 2:

Dr. Saegert and Ms. Wilson's suggestion that the City include additional actions to encourage permanent affordable housing as well as increased opportunities for ownership or tenant control within affordable housing will be carefully considered for inclusion in the final Where We Live NYC report. There are a number of goals, strategies, and actions in the draft Fair Housing Plan that match the suggestions of this testimony. The two strategies suggested by Dr. Saegert and Ms. Wilson are similar to two of the six goals of the draft Fair Housing Plan: Goal 2 is to facilitate equitable housing development in New York City and the region, and Goal 3 is to preserve affordable housing and prevent displacement of long-standing residents. Goal 2 includes a number of actions to increase housing opportunities, particularly for low-income New Yorkers, in amenity-rich neighborhoods. Goal 3 includes strategies to improve quality and affordability for existing residents, in particular residents of NYCHA housing. This strategy also includes an action to explore further opportunities to support and enable mission-based groups, such as Mutual Housing Associations and Community Land Trusts, to create and preserve rent-restricted affordable housing, as suggested by Dr. Saegert and Ms. Wilson.

Comment 3:

Ron Friedman serves as a tenants' association president in Jackson Heights with Catholic Charities of New York and testified that accessing affordable housing in New York City is extremely challenging as a person with disabilities; he also pointed out that the affordable housing application processes can serve as a barrier to accessing publicly-supported housing for people with certain types of disabilities and mental illnesses, as well as those who have experienced homelessness or displacement. He discussed his negative personal experience with the NYC Human Resources Administration (HRA) 2010e Supportive Housing Application, sharing that he was denied five times and that agency staff did not provide clear rationale for not accepting his applications. Based on the support he finally received from a disability advocacy group, Mr. Friedman reported that he was being denied not based on the content in his application, but instead because he was filling out the form incorrectly. Mr. Friedman called for simplifying the application process and creating a formal body that can help residents, especially those with disabilities, correctly fill out the complex housing application forms, since many non-profits do not provide this type of technical assistance. Additionally, Mr. Friedman testified that the City should incorporate parking into the design of supportive housing, since it can be a critical mobility resource for people with physical disabilities. He also discussed the need for increased awareness around City initiatives like Where We Live NYC and was concerned that only a small percentage of stakeholders are engaged through these types of public processes.

Response 3:

Mr. Friedman's testimony reflects the extensive feedback collected through the Where We Live NYC process that underscores the unique challenges faced by New Yorkers with disabilities when it comes to securing affordable, accessible housing and utilizing government services. These specific challenges have led the City of New York to include Goal 5 focused on creating more independent and integrated housing opportunities for people with disabilities, including an action to improve City-subsidized affordable housing services to better serve the needs of people with disabilities. As part of this effort, HPD will work with HRA to carefully consider ways

to make it easier for residents with disabilities to access and live in supportive housing, including application processes and parking requirements. Also, the City shares Mr. Freidman's goal of ensuring that Where We Live NYC is an inclusive and accessible process that engages a wide cross-section of New Yorkers. To date, we have engaged more than 700 residents through 62 focus group-style Community Conversations in 15 different languages and hosted the Where We Live NYC Summit to update the public on the process. To further engage residents, HPD will be hosting additional public events across different boroughs to collect input between the draft and final Where We Live NYC report. Residents can also share input online or host their own fair housing conversations using resources available at nyc.gov/WhereWeLive.

Comment 4:

Michael Higgins of FUREE provided written testimony stating that FUREE has been an active participant in both the HPD-led Where We Live NYC process and the DCP-led Gowanus Neighborhood Planning Study. Mr. Higgins testified that FUREE's focus in both processes concerns a clear inequity in resources for residents of public housing. Mr. Higgins testified that both processes should include additional strategies and policies to support residents of public housing and improve the buildings and apartments in which they live. Mr. Higgins suggested specific policies that could be implemented through the Gowanus Rezoning that he testifies will affirmatively further fair housing:

- Mandatory inclusionary Housing (MIH) options that provide deeper affordability than those currently available through the program.
- A NYCHA preference for new MIH units in addition to the existing community district preference.
- Tenant protection services, education, and outreach for NYCHA residents in Gowanus, similar to the services and outreach being offered to residents of rent-stabilized apartments in the area and specifically including education regarding the Rental Assistance Demonstration (RAD) program.
- Place-based investments in local public housing, including resources for the Gowanus Houses Community Center.

Response 4:

The Where We Live NYC Fair Housing Plan will not include recommendations or actions related to specific neighborhoods; rather, it will include city-wide strategies to affirmatively further fair housing. Some of the main goals of the Fair Housing Plan are to preserve affordable housing and prevent displacement of long-standing residents and to facilitate equitable development within New York City and the region. Implementation of these goals involves actions to preserve and improve housing quality in NYCHA developments, create new affordable housing for low-income New Yorkers in amenity-rich neighborhoods like Gowanus, and also to create new housing of all types in a wide variety of neighborhoods.

Comment 5:

Sabine Aronowsky submitted written testimony on behalf of the Gowanus Neighborhood Coalition for Justice (GNCJ) urging the inclusion of more strategies to address the urgent needs

of public housing residents and other low-income residents – both in Gowanus and across the city. The testimony recommends that the City center the preservation of public housing as a core fair housing issue, and to go beyond the strategies outlined in NYCHA 2.0. GNCJ points out that public housing residents make up 25% of renter households in Gowanus and are a critical component of the income and racial diversity of the neighborhood. Further, GNCJ notes that public housing residents in the neighborhood are populations protected by fair housing law: 25% of residents are minor children, 20% are disabled, and 20% are seniors. The testimony notes that NYCHA developments in the neighborhood “suffer from numerous housing code, environmental hazards and human rights violations, disproportionately impacting the health and safety of thousands of low-income residents, in particular children and seniors of color.” GNCJ recommends the following strategies and actions be included in the Fair Housing Plan:

- Develop only 100% affordable, permanent, and deeply affordable housing on publicly-owned land.
- Create new affordable housing that is deeply affordable and meets the needs of public housing and other low-income residents, to provide NYCHA residents the ability to move out of NYCHA if they so choose.
- Ensure that current NYCHA residents have safe and decent housing.
- Provide ongoing funding to NYCHA through the creation of a value capture mechanism to capitalize on market changes accompanying neighborhood rezonings.
- Fund tenant rights education for NYCHA residents.
- Create an affordable housing lottery preference for NYCHA residents, and commit Section 8 vouchers to NYCHA residents.
- Establish an affordable housing lottery preference for families who have been previously displaced.
- Increase the affordable housing lottery set-aside for people with a disability and for seniors.
- Support and reopen community centers in NYCHA campuses.
- Implement Racial Equity Impact Assessments and Community Health Needs Assessments as part of environmental review processes.

Response 5:

The City of New York and NYCHA agree with GNCJ that the preservation of public housing is a core fair housing issue. The draft *Where We Live NYC* report analyzes the demographics of public housing in New York and the housing experiences of New Yorkers in different housing types, including NYCHA. The draft report notes that over 90% of public housing residents are Black or Latinx, and that both groups are more likely than other racial or ethnic groups to experience poor housing quality. The draft report notes the connections between access to safe and healthy housing and a wide range of outcomes from health to economic opportunity. The *Where We Live NYC* process has centered both housing preservation and the prevention of displacement as core fair housing issues in a high cost, growing city. Many of the strategies suggested by GNCJ, such as changes to affordable housing preference policies, have significant legal and feasibility challenges to implementation. HPD and NYCHA will research and consider these and the other specific recommended actions for inclusion in the final plan.

Comment 6:

Suhali Méndez, a Disability Justice Advocate with New York Lawyers for the Public Interest (NYLPI), provided written testimony that emphasized the importance of enforcing fair housing protections for people with disabilities, including ensuring reasonable accommodations are met. NYLPI urged the City to introduce additional accountability measures and increase the penalties for landlords who discriminate, especially based on disability and source of income; fail to provide reasonable accommodations; or engage in retaliatory behaviors towards tenants who make reasonable accommodation requests. The testimony also cited that illegal housing discrimination can take the form of poor housing conditions or landlords who do not adequately address repairs. NYLPI outlines how housing discrimination, lack of repairs, and failure to provide reasonable accommodations can lead to displacement, negatively impact community stability, and perpetuate segregation by preventing people with disabilities from accessing affordable housing in inclusive and integrated communities. Additionally, the testimony recommends that HPD support New York State Senate bill S.6220-A which would require landlords to prominently disclose to all tenants their legal right to reasonable accommodations.

Response 6:

The City of New York agrees with NYLPI that fighting housing discrimination in all of its forms is critical to furthering fair housing and building just, inclusive neighborhoods. Through the Where We Live NYC public engagement process, we gathered extensive input from New Yorkers outlining the ways in which overt and covert housing discrimination is still a widespread practice that unfairly limits housing and neighborhood options for many, including New Yorkers with disabilities. There are several goals, strategies, and actions in the draft Fair Housing Plan that align with the suggestions in this testimony. Specifically, Goal 1 focuses on expanding proactive enforcement to hold landlords accountable and increasing agency resources for addressing fair housing complaints, with a focus on supporting people with disabilities and residents using rental assistance. Through Where We Live NYC, the City has also outlined how preservation and anti-harassment initiatives are core fair housing issues in a high-cost city like New York, which is why Goal 3 aims to address harassment, retaliation, and poor treatment of tenants. Based on the City's extensive engagement with residents with disabilities, as well as service providers and advocates who work with this population, we have included Goal 5 specifically focused on creating more independent and integrated housing opportunities for people with disabilities. This goal includes actions to better connect residents with disabilities and service providers with improved online resources and trainings; expand programs that allow seniors and people with disabilities to stay in their homes while having their accessibility needs met; and improve education for architects and developers so they fully follow their legal responsibilities to accommodate people with disabilities. While the Fair Housing Plan does not call out specific legislative proposals, HPD will take time to analyze the state disclosure bill suggested by NYLPI as part of our efforts to ensure tenants understand their fair housing rights and how to exercise them.



**The City of New York
Mayor Bill de Blasio**

Vicki Been
Deputy Mayor for Housing and
Economic Development