

Town of Huntington

An Analysis of Impediments For Fair Housing and Strategies to Address Them

June 2020

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UPDATE JUNE 2020
FAIR HOUSING PLAN:

Equal access to housing is fundamental to all persons in meeting essential needs and pursuing personal goals. In recognizing equal housing access as a fundamental right, the federal government established fair housing choice as a right protected under the law.

The Community Development Agency conducted an analysis of the demographic profile of the Town of Huntington to assess the extent of housing needs among specific income groups, and evaluated the availability of a range of housing choices to them. This report also analyzes the conditions of the private market and the public sector that could limit the range of housing choices or impede access to housing. This report focuses on the identification of impediments that could prevent equal housing access and the development of solutions to mitigate or remove such impediments. This report is funded through Community Development Block Grant (CDBG) funds.

The Huntington Community Development Agency further examined a wide array of issues, procedures and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions affecting both public and private fair housing choice.

What is Fair Housing?

Federal fair housing laws prohibit discrimination in the sale, rental or lease of housing, and in the negotiations for real property, based on race, color, religion, sex, national origin, familial status and disability.

Fair Housing legal Framework

The federal Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988 (42 US Code 3601-3619, 3631) are federal fair housing laws that prohibit discrimination in all aspects of housing, such as the sale, rental, lease or negotiation for real property. The Fair Housing Act prohibits discrimination based on race, color, religion, sex and national origin.

In 1988, the Fair housing Act was amended to extend protection to familial status and people with disabilities (mental or physical). In addition, the Amendments Act provides for “reasonable accommodations” allowing structural modifications for persons with disabilities, if requested, at their own expense, for multi-dwellings to accommodate the physically disabled.

Housing Issues, Affordability and Fair Housing

The US Department of Housing and Urban Development (HUD) Fair Housing and Equal Opportunity Division distinguish between housing affordability and fair housing. Economic factors that affect a household’s housing choices are not fair housing issues per se. Only when the relationship between household income, household type, race/ethnicity and other factors create misconceptions, biases and differential treatment do fair housing concerns arise.

Tenant/Landlord issues are typically not related to fair housing. Most disputes between tenants and landlords result from a lack of understanding by either party regarding their rights and responsibilities.

Impediments to fair housing choice are defined as:

- Actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choice or availability of housing choice.
- Any action, omission, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

This updated Town of Huntington Analysis and Impediments Report has been designed to provide an overview of the laws, regulations and conditions that could affect an individual's or a household's access to housing.

Town of Huntington-Demographic Background Data

For this study only, U.S. Census data was used unless noted otherwise. It is important to note that data may be skewed because the U.S. Census does not strictly define local hamlet boundaries.

The Town of Huntington has long been a residential community. The residential character of the town was primarily shaped by large-scale development of single-family detached housing to accommodate the influx of relatively large households during the two decades following the Second World War. The relatively stable population growth of Huntington in the past limited the need to depart from the pattern of large-scale single-family homes.

The 2020 Census data shows the Town Population at 198,392 persons which is 2.4% decrease from the 2010 Census. The 2010 Census data shows the Town Population at 203,264 persons which is a 4% increase over the 2000 Census. The 2000 Census states the population at 195,289 persons, which was a 2% increase over the 1990 census. The Town of Huntington population was 191,474 according to the 1990 Census, which represented a 5% decrease in the population for the ten-year period from 1980.

The Town of Huntington racial and ethnic composition in the 2020 Census is 89.7% White, .07% Black or African American, 5% Hispanic, .01% American Indian/Alaskan Native/Native Hawaiian and Another Pacific Islander. The White Population increased by percentage but decreased in total population by 27,080 persons. The Black or African American Population shows an increase in persons but a decrease in population percentage. The largest growth segment was seen in the Hispanic population, increasing in total population by 20,930 total persons.

The Town of Huntington racial and ethnic composition in the 2010 Census is 84% White, 4.8% Black, 5% Hispanic, 5% Asian/Pacific Islands and 2% other. The racial and ethnic data for 2000 Census was 87% White, 4% Black, 4% Hispanic 5% Asian alone and less than 3% other. This data shows a 3% decline in the White population alone, however a rise in overall population of 6,021 persons. The Black or African American and the Hispanic or Latino population percentage remained the same at 4% and 5%. The largest growth segment according to the 2010 Census was the Asian/Pacific Islands at a 3% increase bringing the total to 5% of racial/ethnic population.

In the past ten years the Hispanic or Latino and other race population of the Town of Huntington has represented the largest growth. Both have exceeded 300% growth over the past decade.

There are only two Census tracts where income is below 50% of the median, showing that low-income individuals are dispersed evenly throughout the Town of Huntington. The Hispanic or Latino (all races) population has increased over 60% in the last twenty years.

2020 Census

Race/Ethnicity	Number of Persons	Percent
White alone (not Hispanic)	143,968	89.7%
Black or African American	9,222	.07%
Hispanic or Latino	30,934	5.0%
Native American and Alaska Native	653	.01%
Asian Alone	13,312	2.2%
Native Hawaiian/Pacific Islands	47	<.01%
Some other race alone	14,417	1.3%
Two or more races	16,773	6.0%
Total Population	198,392	100.0%

2010 Census

Race/Ethnicity	Number of Persons	Percent
White alone (not Hispanic)	171,048	84%
Black or African American	8,933	4%
Hispanic or Latino	10,004	5%
Native American and Alaska Native	187	.01%
Asian Alone	10,009	5%
Native Hawaiian/Pacific Islands	32	.01%
Some other race alone	344	.01%
Two or more races	2707	2%
Total Population	203,264	100.0%

2000 Census

Race/Ethnicity	Number of Persons	Percent
White	165,027	87%
Black	7,934	4%
Hispanic	12,894	5%
Native American	211	.01%
Asian Alone	6,812	3%
More Race	2,461	.9%
Total Population	195,339	99.91%

1990 Census

Race/Ethnicity	Number of Persons	Percent
White	171,047	89.3%
Black	7,607	4.0%
Hispanic	7,777	4/1%
Native American	209	.01%
Asian Alone	4,834	2.5%
Total Population	191,474	100.0%

1980 Census

Race/Ethnicity	Number of Persons	Percent
White	187,578	93.0%
Black	6,756	3.4%
Hispanic	4,773	2.4%
Native American	156	0.1%
Asian Alone	2,249	1.1%
Total Population	201,512	100.0%

1970 Census

Race/Ethnicity	Number of Persons	Percent
White	194,493	96.94%
Black	5,101	2.54%
Other	977	.49%
Total Population	200,571	100.0%

1960 Census

Race/Ethnicity	Number of Persons	Percent
White	123,346	98.0%
Black	2,612	2.0%
Other	263	N/A
Total Population	126,221	100.0

The age composition of the Town's population according to the 2020 Census, is as follows: 22.84% are 62 or older- a 7% increase; 34.4% are 35-59 years old; 15.5% are 20 to 34 years old- a significant decrease from 1990 and 23.4% are under 20 years old showing a large trend in younger families vacating the area, as well as older families staying in the town.

Overall, the total population of Huntington has not changed significantly since 1970; however, the minority population has increased from 3% to 11%. HCDA looked at six established individual hamlets for the purpose of this housing study.

Information on the six largest hamlets in Huntington shows that since 1980 we have seen a relatively equal distribution of minorities throughout the municipality. Most notable is the increase of the Hispanic or Latino populations in Huntington Station and the Asian Alone population in Dix Hills.

Huntington Station

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC Or Latino	OTHER	TWO OR MORE RACES
1970	28,817 (100%)	26,671 (92.5%)	2,016 (7%)	N/A	N/A	(0.5%)	130 (0.05%)	N/A
1980	28,769 (100%)	25,170 (87.5%)	2,985 (10.3%)	32 (0.1%)	301 (1.0%)	1,542 (5.4%)	308 (1.1%)	N/A
1990	28,247 (100%)	20,922 (74.1%)	3,378 (11.9%)	38 (0.1%)	498 (1.8%)	3,377 (11.9%)	34 (0.0%)	N/A
2000	29,910 (100%)	21,401 (71.5%)	3,459 (11.6%)	106 (0.1%)	924 (3.1%)	3,002 (10.2%)	N/A	1,018 (3.5%)
2010	33,029 (100%)	15,722 (47.7)	3,299 (10%)	60 (1%)	1,154 (3.5%)	12,109 (36.7%)	80 (.2%)	605 (1.8%)
2020	34,878 (100%)	15,035 (43.1%)	3,210 (9.2%)	317 (0.9%)	1,610 (4.6%)	15,793 (45.3%)	9,221 (26.4%)	5,465 (15.7%)

Except for Huntington Station, all of the hamlets in the Town of Huntington grew significantly in population between 1970 and 1980. Huntington Station, the most populated and oldest hamlet in the Town, had minimal growth. According to the Census a review of the data shows that between 1980, 1990 and 2000 a more diverse population including an increased percentage of persons with Hispanic origin has replaced older families reflecting the primary Caucasian composition of earlier decades. In the 2020 Census we see a dramatic increase in Hispanic or Latino and other race growth.

The reasons for Hispanic or Latino growth in Huntington Station are twofold. First, this is where the housing is generally less expensive than elsewhere in the Town. Second, there is a substantial Spanish-speaking population already residing in this hamlet. The major reason Hispanic or Latino people choose to live in Huntington Station is no different than that of any other specific population migration within a prescribed area: cultural identity. Huntington Station offers an existing and extensive support network of family, friends, religious institutions, Hispanic and Latino-based retail establishments and professionals, and more, all providing a solid framework for social and cultural belonging.

Greenlawn

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC	OTHER	TWO OR MORE RACES
1970	8,493 (100%)	8,390 (98.3%)	123 (1.44%)	N/A	N/A	(0.5%)	19	N/A
1980	13,869 (100 %)	(87.5%)	2,985 (10.3%)	32 (0.1%)	301 (1.0%)	1,542 (5.4%)	308 (1.1%)	N/A
1990	28,247 (100.0%)	20,922 (74.1%)	3,378 (11.9%)	38 (0.1%)	498 (1.8%)	3,377 (11.9%)	34 (0.0%)	N/A
2000	29,910 (100 %)	21,401 (71.5%)	3,459 (11.6%)	106 (0.1%)	924 (3.1%)	3,002 (10.2%)	N/A	1,018 (3.5%)
2010	13,742 (100%)	9,338 (68%)	1,841 (13.3%)	34 (.7%)	555 (4%)	1,724 (12.3%)	13 (.1%)	237 (1.6%)
2020	9,593 (100%)	7,562 (78.8%)	462 (4.8%)	31 (.3%)	488 (5.1%)	983 (10.2%)	327 (3.4%)	723 (7.5%)

Since 1970 Greenlawn has also seen an extraordinary increase in minority population, from less than 1.5% to over 20% of the population. However, from 2010 to 2020 the total population decreased by 4,149 people. Black or African American, American Indian, and Hispanic all decreased significantly in population percentage. This may be due to higher cost of homes and taxes within Greenlawn over the past 10 years. It should be noted that the hamlet includes the south/west corner of Pulaski Road and Elwood Road.

Dix Hills

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC	OTHER	TWO OR MORE RACES
1970	10,050 (100 %)	9,983 (99.3%)	34 (0.34%)	N/A	N/A	N/A	33	N/A
1980	26,693 (100 %)	25,527 (95.6%)	419 (1.6%)	20 (0.1%)	645 (2.4%)	539 (2.0%)	82	N/A
1990	25,549 (100 %)	23,173 (89.6%)	573 (2.2%)	23 (0.09%)	1,314 (5.1%)	744 (2.9%)	10	N/A
2000	26,024 (100 %)	21,817 (83.7%)	846 (3.3%)	14 (0.1%)	1,916 (7.4%)	971 (3.7%)	N/A	460 (1.8%)
2010	26,872 (100%)	20,433 (76%)	1,385 (5.2%)	23 (.1%)	2,990 (11.1%)	1,533 (5.7%)	60 (.2%)	468 (1.7%)
2020	26,180 (100%)	17,574 (67.1%)	1,481 (5.7%)	71 (0.3%)	4,409 (16.8%)	2,224 (8.5%)	762 (2.9%)	1,872 (7.2%)

Population has remained steady since 1980 in Dix Hills. Studying the 1980 to 1990 Census information shows growth in all minorities, this has continued into the 2010 and 2020 Census. The minority population in Dix Hills is now over 32% of the total. In addition to racial and ethnic components in assessing housing needs, it is important to look at language ability in each area.

East Northport

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC	OTHER	TWO OR MORE RACES
1970	12,392 (100.0%)	12,325 (99.4%)	29 (0.3%)	N/A	N/A	N/A	38	N/A
1980	20,187 (100.0%)	19,871 (98.4%)	60 (0.3%)	14 (0.1%)	160 (0.8%)	419 (2.1%)	82 (0.4%)	N/A
1990	20,411 (100.0%)	19,287 (94.5%)	147 (0.7%)	19 (0.09%)	354 (1.7%)	598 (2.9%)	6 (0.03%)	N/A
2000	20,845 (100%)	18,870 (90.5%)	189 (0.9%)	26 (0.1%)	475 (2.3%)	1,021 (4.9%)	N/A	264 (1.3%)
2010	20,217 (100%)	17,888 (88.5%)	158 (.8%)	5 (.1%)	564 (2.7%)	1,354 (6.7%)	35 (.1%)	213 (1.1%)
2020	30,353 (100%)	25,330 (83.5%)	463 (1.5%)	45 (.1%)	1496 (4.9%)	2,930 (9.7%)	899 (3.0%)	2,114 (7.0%)

The hamlet furthest east in the Town of Huntington is East Northport. This data shows since 2010 the Black and Asian population has increased over 50% while the larger Hispanic population increased almost 300% during the period 2010 to 2020. 2020 data shows an increase in minority percentages.

Huntington

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC	OTHER	TWO OR MORE RACES
1970	12,601 (100.0%)	11,883 (93.4%)	795 (6.2%)	N/A	N/A	N/A	N/A	N/A
1980	21,727 (100.0%)	20,925 (96.2%)	529 (2.4%)	25 (0.11%)	169 (0.8%)	(1.4%)	99	N/A
1990	18,243 (100.0%)	16,985 (93.1%)	487 (2.7%)	23 (0.1%)	281 (1.5%)	458 (2.5%)	9 (0.05%)	N/A
2000	18,403 (100%)	16,945 (92%)	385 (2.1%)	21 (0.1%)	332 (1.8%)	510 (2.8%)	N/A	210 (1.2%)
2010	18,046 (100%)	16,142 (89.4%)	382 (2.1%)	16 (.1%)	390 (2.2%)	906 (5%)	19 (.1%)	191 (1.1%)
2020	41,522 (100%)	32,038 (77.2%)	2,304 (5.5%)	114 (0.3%)	1928 (4.6%)	4,870 (11.7%)	1893 (4.6%)	3,237 (7.8%)

The 2020 Census puts the hamlet of Huntington with more than 22,000 more persons than the 2010 Census. 2020 data shows a significant increase in the minority population. White Alone are declining as a portion of the population and conversely the Hispanic or Latino and Asian, and Black or African American and Other Alone populations are growing.

Melville

YEAR	TOTAL	WHITE Alone	BLACK or AFRICAN AMERICAN	AMERICAN INDIAN	ASIAN Alone	HISPANIC Or Latino	OTHER	TWO OR MORE RACES
1970	6,641 (100.0%)	6,616 (99.6%)	8 (0.12%)	N/A	N/A	N/A	17	N/A
1980	8,139 (100.0%)	7,762 (95.4%)	157 (1.9%)	15 (0.2%)	155 (1.9%)	185 (2.3%)	50 (0.17%)	N/A
1990	12,586 (100.0%)	11,497 (91.3%)	183 (1.5%)	7 (0.06%)	514 (4.1%)	383 (3.0%)	2 (5%)	N/A
2000	14,533 (100%)	13,070 (90.0%)	300 (2.1%)	5 (0.1%)	787 (5.4%)	151 (0.9%)	N/A	220 (1.5%)
2010	18,985 (100%)	15,730 (82.9%)	607 (3.2%)	12 (.1%)	1,372 (7.2%)	955 (5%)	58 (.3%)	247 (1.3%)
2020	20,133 (100%)	15,579 (77.4%)	919 (4.6%)	33 (0.2%)	2,012 (10%)	1,402 (7.0%)	488 (2.4%)	1,099 (5.5%)

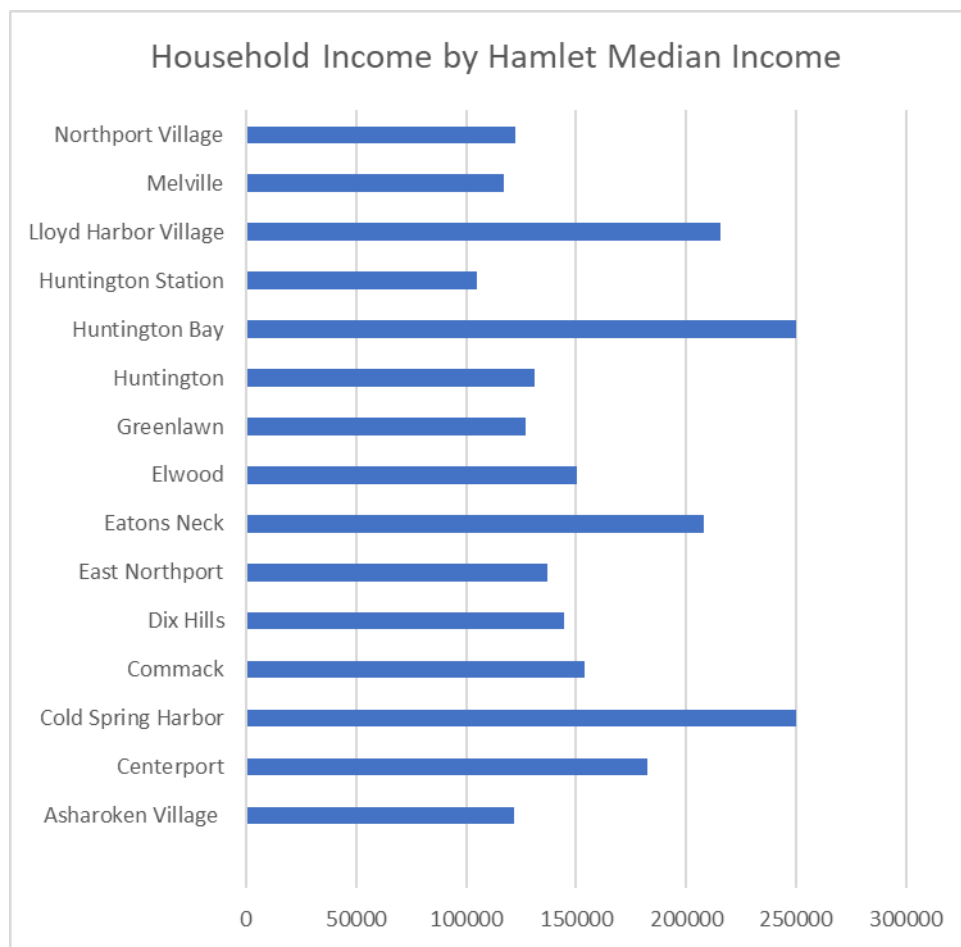
Melville has seen steady growth overall through the fifty year study, with the population becoming more diverse. In 1970, 99.6% were non-Hispanic White and in 2020 77.4% of persons were non-Hispanic white. The Asian population has nearly doubled in the past twenty years. Black or African American, Other, and the Hispanic or Latino populations have seen growth according to the 2020 Census, with this hamlet seeing most of the new residential development over the past ten years.

In the hamlet of Dix Hills, the Town has seen a dramatic increase in the Asian population. Incomes among Dix Hills residents of Asian origin are well above HUD low-income and middle-income guidelines, according to the 2020 Census. A majority of the home prices in the hamlets of Melville and Dix Hills start at over \$700,000. Realtors claim that persons of Asian origin frequently wish to be located in the Half-Hollow Hills school district, which includes Dix Hills and Melville.

Town of Huntington-Income Background Data

Household income is the most important factor determining a household's ability to balance housing costs with other basic life necessities. Although economic factors that affect a household's housing choice are not a fair housing issue per se, the relationship among household income, household type, race/ethnicity and other factors often create misconceptions and biases that raise fair housing issues.

In the Town of Huntington over 63% of the population makes more than the Town's household median income of \$115,471. Huntington Station and Melville show the lowest income with \$104,871 and \$117,472 respectively. The Huntington Station household incomes are less than the Town's median household income.



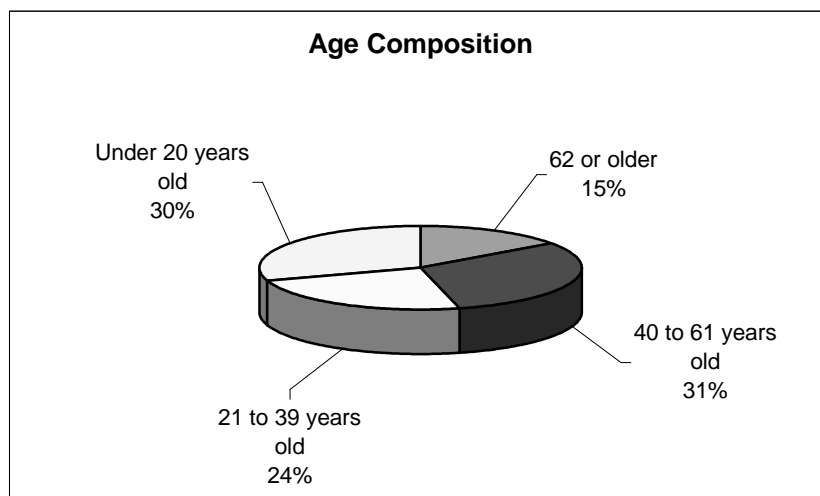
Household Income by Hamlet							
Hamlet	Median Income	Less than \$10,000	\$ 10,000-	\$ 25,000-	\$ 50,000-	Over \$99,999	Total Household
			\$24,999	\$49,999	\$74,999		
Asharoken Village	121,993	35	36	7	28	113	291
Centerport	182,321	30	80	139	111	1665	2,168
Cold Spring Harbor	250,000+	20	9	36	60	807	958
Commack	153,858	208	104	915	1,008	8,328	11,583
Dix Hills	144,494	180	353	613	536	5,660	7,765
East Northport	136,818	247	413	490	800	4,765	7,208
Eatons Neck	208,125	7	0	33	17	335	439
Elwood	150,549	109	98	233	310	2,496	3,645
Greenlawn	127,024	369	269	492	369	2,670	4,556
Huntington	131,193	280	436	678	771	4,971	7,791
Huntington Bay	250,000+	37	15	25	17	556	697
Huntington Station	104,871	306	885	1,333	1,464	5,725	10,925
Lloyd Harbor Village	215,929	38	27	49	62	788	1,179
Melville	117,472	200	379	916	1067	3,787	7,159
Northport Village	122,250	184	196	326	294	1,652	2,966

The distribution of household income in each hamlet of the Town of Huntington varies at all levels. The largest population of households earning an income less than \$50,000 can be found predominantly in Huntington Station, Greenlawn, and East Northport. On the high end of the spectrum incomes over \$100,000 are found in Lloyd Harbor Village, Eatons Neck, Huntington Bay, and Cold Spring Harbor.

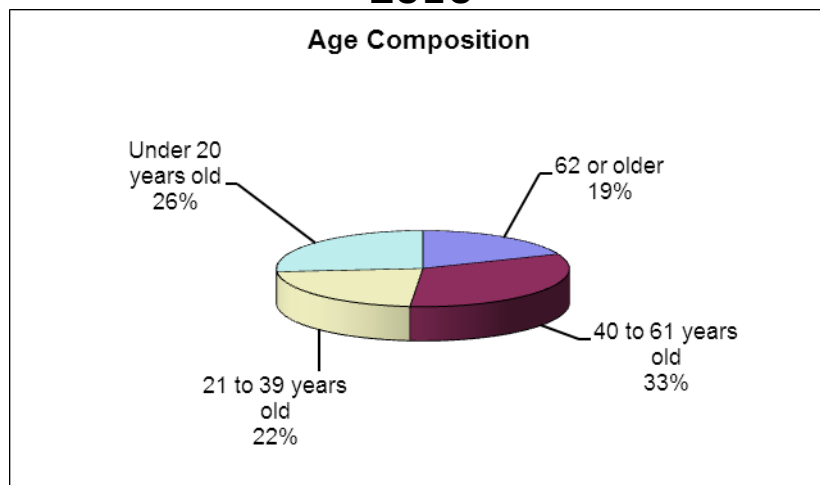
Town of Huntington- Age Data

The age composition of the Town's population according to the 2020 census is as follows: 27.4% are 60 or older; 28.16% are 40 to 59 years old; 21.65% are 20 to 39 years old; and 22.77 % are under 20 years old.

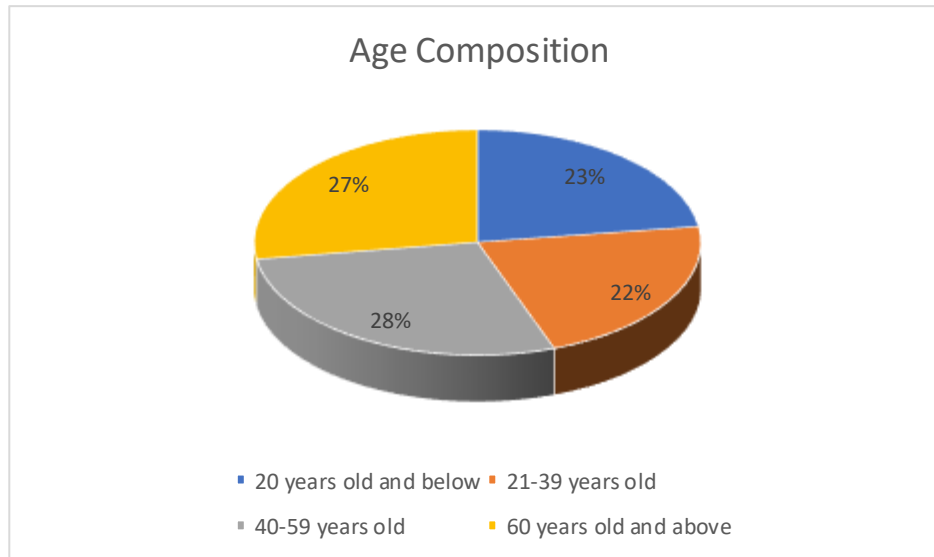
2000



2010



2020



The pie charts above show the change in the Town's population by age distribution. In 2000 and 2010, the largest age group was 40-61 year old. This remains the same in 2020. In 2020 40 to 61 year old made up 28 percent of the population. The 60 or older population grew 19% to 27% of the total population. Conversely, under 20 year old represented the lowest percentage of the Town's population, making up only 22% of the population in 2020.

Analyzing the age distribution is important because it affects the future need for jobs, appropriate housing and relevant social services.

Town of Huntington- Employment Data

In February 2014 statistics show a 5.6% unemployment rate in the Town of Huntington; however, in 2020 the Town of Huntington unemployment rate is at 3.3%. The data shows a total labor force of 152,728 and of those 5,091 were unemployed. The September 2014 data reveals a labor force of 105,700 and of those, 4,500 were unemployed. This study would indicate the consistent trend of Huntington's growth of employment and lowering unemployment rates since 2014.

Town of Huntington- Housing Profile

The Town of Huntington housing has a total of 69,327 occupied housing units. A majority of those housing units are single family detached units totaling 58,788. Owner-occupied units are at 60,830 and rental-occupied units represent a total of 8,497.

Town of Huntington Composition of Housing Stock

Units in Structure	Estimate	Percent
1-unit detached/attached	58,788	84.8%
2 to 4 units	1253	1.8%
5 to 19 units	294	.42%
20 or more units	416	.60%
Mobile Home, Boat RV Van Etc.	79	.11%
TOTAL	69,327	100%

American Study B25127 US Census Bureau, ACS 2020

Town of Huntington- Housing Conditions

The age of the housing stock has and will continue to be an issue in Huntington. 80% of our Town's housing stock was constructed before 1960 - over fifty years ago. A second wave of housing, representing 27% of the overall inventory, was built between 1960 and 1979. With 80 percent of Huntington's housing inventory having been constructed over 50 years ago, without adequate maintenance, repair and rehabilitation, overall housing conditions will decline, particularly if owned by a rising senior population with limited means and ability to provide necessary upkeep.

The condition of a Town's housing stock is not in itself an impediment to fair housing. However, for many low/moderate income families, substandard housing is the only housing available at an affordable price.

Town of Huntington Age of Housing

Year Structure Built	Estimate	Percent
Built 2020 or Later	25	.041%
Built 2000 to 2019	4624	7.61%
Built 1980 to 1999	6973	11.5%
Built 1960 to 1979	23,575	38.8%
Built 1940 to 1959	19,743	32.5%
Built 1939 or earlier	5,890	9.7%
TOTAL	60,830	100%

American Study B25127 US Census Bureau, ACS 2020

Town of Huntington- Special Needs Population

People with disabilities often need some form of special housing consideration. Circumstances surrounding the type of disability may call for proximity to mass transit facilities, workplace, handicap ramps, additional railings, curb cuts, connecting walkways, restroom grab bars, and the like.

Information from the table below is a one year estimate of the number of individuals with disabilities in the Town of Huntington. Approximately 9.5% of the total civilian non- institutionalized population reported some type of disability. Out of the 18,915, persons under the age of 18, 0.58 % was reported to have some form of disability. A larger percentage of 4.14 % was reported for those people aged 18-64 years old. The age group with the highest percentage of disabilities was seniors over the age of 65.,545 seniors or approximately 4.81% were reported to have some form of disability.

Town of Huntington Disability Characteristics

Population with a Non-institutionalized Disability	Estimate	Percent
Population under 5 years	84	0.04%
Population 5 to 17 years	1,070	.54%
Population 18 to 64 years	8,216	4.14%
Population 65 years and over	9,545	4.81%
TOTAL	18,915	9.53%

2020 US Census Bureau, American Community Survey 1-year estimates (S1810)

HUD refers to those with special needs as individuals with a disabling condition, primarily involving a mental or physical challenge that requires some form of special housing accommodation in order to live an independent life style.

Elderly and frail persons are included in this category, as well as those with severe mental disabilities, developmental disabilities, ambulatory difficulty, persons with drug and/or alcohol addictions, persons with HIV/AIDS and homeless individuals.

Supportive housing also falls into the special needs housing category. These housing units provide a supportive environment and consist of some form of a planned social service component that enables individuals to transition into traditional permanent housing.

Town of Huntington- Housing Affordability

According to the federal government, rental housing is affordable if the household in residence pays no more than 30% of their income for rent. For mortgage lenders, a home is deemed affordable if the mortgage payment is no more than 35% of borrower's income.

There are 55,149 owner-occupied units in the Town of Huntington, 34,745 of those units have a mortgage and 20,404 units are without a mortgage. Approximately 36% of those housing units with a mortgage pay 30% or more of their income for housing cost. Homeowners who live in housing units without a mortgage naturally pay a lesser percentage of their income on housing. However, there are still 35% of those without a mortgage that pay 35% or more of their income on their housing unit.

An important concern with regard to housing affordability occurs in occupied units that pay rent rather than own their property. In fact, 61.1% of Town of Huntington residents pay more than their 30% of their income household rent.

Town of Huntington Selected Monthly Owner Cost as a Percentage of Household Income (SMOCAP)

Housing units with a Mortgage	Estimate	Percent
Less than 20.0 percent	10,850	31.2%
20.0 to 24.9 percent	6,382	18.3%
25.0 to 29.9 percent	4,762	13.7%
30.0 to 34.9 percent	3,196	9.2%
35.0 percent or more	9,555	27.5%
TOTAL (excluding units where SMOCAP cannot be computed)	34,745	100%
Not Computed	83	-

2010 5-Year Estimate US Census Bureau, American Community Survey (DP04)

Town of Huntington Housing Units without a Mortgage

Housing Units without a Mortgage	Estimate	Percent
Less than 10 Percent	5,269	25.82%
10.0 to 14.9 Percent	3,788	18.5%
15.0 to 19.9 Percent	2,693	13.2%
20.0 to 24.9 Percent	2,095	10.3%
25.0 to 29.9 Percent	1,316	6.4%
30.0 to 34.9 Percent	989	4.8%
35.0 Percent or more	4,254	20.8%
TOTAL (excluding units where SMOCAP cannot be computed)	20404	100%
Not Computed	156	-

2010 5-Year Estimate US Census Bureau, American Community Survey (DP04)

Town of Huntington Rent

Gross Rent as a Percentage of Household Income (GRAP)	Estimate	Percent
Less than 15.0 percent	1,137	13.2%
15.0 to 19.9 percent	968	11.2%
20.0 to 24.9 percent	1,123	13.0%
25.0 to 29.9 percent	1,044	12.1%
30.0 to 34.9 percent	610	7.1%
35.0 percent or more	3,764	43.5%
TOTAL (excluding units where GRAP cannot be computed)	8,646	100%
Not Computed	692	-

2010 5-Year Estimate US Census Bureau, American Community Survey (DP04)

The development of rental units has begun to catch up to the development of for-sale housing units in the Town of Huntington. An important factor that has been a barrier is the limited areas available for high-density residential zoning. While most of the older high-density residential projects were built as rentals, in more recent years higher-density development has focused on for-sale townhomes and condominiums. The development of such units directly corresponds with shifting demographics in Huntington, which includes a growing senior population, single-parent families, and childless households that find alternative housing options attractive as they more conducive to their lifestyles.

Besides zoning, there are two important factors over which the Town has little or no control that limit the development of high-density residential projects- lack of vacant land and public sewer infrastructure. The Town of Huntington is a mature suburb where most residential subdivisions consist of two or three lots. Larger residential developments typically involve property being readapted from former uses such as farms, camps, and golf courses. With each passing year, fewer such large properties conducive to adaptive re-use remain. Those large vacant parcels still remaining typically have physical and/or environmental development impediments such as steep slopes or wetlands.

Another compelling factor is the limited coverage of a public sewer system to service new development, both residential and commercial. Development density is substantially restricted where sewers are unavailable because groundwater is our region's main source of public water supply. Expansion of the sewer system is limited by the astronomical costs involved in adding such infrastructure. To address this issue, in more recent years elected leadership at all levels is either making funding available, or seeking new funding sources to construct the sewer infrastructure necessary to support our region's continuing prosperity, changing demographics and lifestyle. Funding has been approved for upwards of \$44 million dollars to be dedicated to expanding sewer infrastructure in Huntington Station.

Since its adoption in January 1999 the current Accessory Apartment Ordinance has been amended from time to time, but its original purpose and intent remains the same: to allow residents in owner-occupied dwellings to remain in their homes, whether they are seniors, first-time homeowners, or families.

The changes in the ordinance include the designation of a Housing Officer (HO) rather than a separate board to consider and determine applications for accessory apartments with the Zoning Board reviewing appeals, and the

unlimited extension of permits for existing non-owner occupied accessory apartments that would have otherwise expired.

Ownership of a single family home in suburban communities with unusually high land values is often difficult or impossible for most low and moderate-income families. In the Town of Huntington, the median price for a single family home has been at or above \$565,000 for the past five years. Property taxes for homes within that price range are between \$9,500 to \$12,000. Assuming a 20% down payment and an 8% interest rate on a mortgage, a homeowner is faced with a monthly payment of \$3,493.10 for principal, interest, taxes, and insurance, plus payments for utilities, repairs, and maintenance.

The high cost of owning and maintaining a house in this region has led many homeowners to create illegal rental apartments in single-family homes. Also, many homeowners cannot afford to remain in their homes without an added income from rent. Many illegal apartments, when discovered by Town building inspectors, have been found substandard and hazardous to the residents that inhabit them.

The recognition that illegal apartments would continue to exist, because of economic necessity to many homeowners, the changing demographics of the Town, and need to provide safe and affordable housing to its residents led the Town to adopt laws allowing for the creation of legal accessory apartments, and the regulation of such dwellings.

Approximately 2,500 such apartments have been approved since the ordinance was enacted in 1991. Rental rates are dictated by the market, but apartments are generally more affordable than the cost of a single family home. Apartments are often more suitable for the needs of the elderly, single persons, small families, and people whose jobs require frequent relocation. Many legal accessory apartments are advertised for rent through licensed realtors. State and federal law forbid realtors to discriminate in the listing or showing of property. Therefore, although owners of these apartments are exempt from the fair Housing Act, listing with a licensed realtor provides some protection that the apartment will be rented to race, color, national origin, religion, gender or disability of the prospective tenant.

The regulation of accessory apartments coincides with the prosecution of and enhancement of penalties for homeowners with illegal apartments. This is consistent with the Town's goal of eliminating substandard housing. In addition to the benefits for tenants, a prospective homeowner of moderate means is more likely to qualify for a mortgage when a legal rental apartment offers the potential for additional income. In summary, the Town believes that permitting accessory apartments substantially increases the availability of safe and affordable rental units for lower and moderate-income individuals and families.

Town of Huntington- Public Assisted Housing

The Huntington Housing Authority in the Town of Huntington provides fair housing services for its residents. The primary mission of the Huntington Housing Authority is to "provide safe, decent, and quality affordable housing and supportive services to eligible persons with limited incomes, through federal resources."

The Huntington Housing Authority administers the Section 8 Housing Voucher and subsidized public housing programs for the Town of Huntington. The section 8 Housing voucher Program provides rental subsidies to low-income families that spend more than 30 percent of their gross income on housing cost. The program pays the difference between 30 percent of the recipients' monthly income and the federally approved payment standard. Recipients of housing vouchers are able to find their own housing, including single-family homes, townhomes and apartments. Participants are free to choose any housing that meets the requirements of the program.

Town of Huntington- Affordable Housing

If developers ask for a change of zoning on a parcel to achieve a higher density residential yield than that which is permitted by right, the Town's affordable housing law is triggered. This law is an important tool for increasing affordable housing in the Town in that it requires a certain number of units within a given development to be constructed that are affordable to those earning 80% of the median income. The law applies to both new equity and new rental housing developments. The Town's affordable housing program has created 521 affordable units since 2012. 512 units for home ownership and 9 units for rental.

Town of Huntington- Zoning

The Town of Huntington zoning policy provides for a range of residential development opportunities that are implemented through the Town's existing residential zones as shown below. Housing supply and cost are affected by the amount of land designated for residential use, and the density in which development is permitted.

Town of Huntington Zoning

Section Number	District	Uses Permitted in District to Which Standards Apply
198-13	R-80 Residence	All Uses
198-14	R-40 Residence	All Uses
198-15	R-20 Residence	All Uses
198-16	R-15 Residence	All Uses
198-17	R-10 Residence	All Uses
198-18	R-7 Residence	All Uses
198-19	R-5 Residence	Single-Family dwellings Two-Family dwellings
198-20	R-3M Residence	All Uses
198-20.1	R-HS Residence	All Uses
198-21	R-RM Residence	All Uses
198-21.3	R-OSC Residence	All Uses
198-22	C-1 Office Residence	Single-Family Dwellings Two-Family Dwellings Multiple –Family Dwellings Other Uses
198-23	C-2 Office Building District	Office and Research Uses
198-24	C-3 Special Business	Dwellings Other Uses
198-25	C-4 Neighborhood Business	Dwellings Other Uses
198-26	C-5 Planned Shopping Center	All Uses
198-27	C-6 General Business	All Uses
198-28	C-7 Minor Commercial	All Uses

	Corridor	
198-29	C-8 General Business A	Dwellings Other Uses
198-30	C-9 Harbor Use	Waterfront Properties – All Uses Near-Water Properties – All Uses
198-31	C-10 Planned Motel	All Uses
198-32	C-11 Automotive Service Station	All Uses
198-33	C-12 Professional	All Uses
198-34	I-1 Light Industry	All Uses
198-35	I-2 Light Industry	All Uses
198-36	I-3 Light Industry	All Uses
198-37	I-4 Light Industry	All Uses
198-38	I-5 General Industry	All Uses
198-39	I-6 General Station	All Uses

Town of Huntington- Schools

There are eight public school districts in the Town of Huntington. Each individual district carries costs associated with teacher and administrator salaries and benefits, facilities maintenance, insurance, bus systems, student's books, supplies, and sports equipment. These costs are reflected in the property tax rates for each community. Affluent communities where households can afford the cost of high property tax payments are able to support competitive public schools and provide for the educational needs of their children. Conversely, less affluent communities are unable to raise sufficient tax revenue to support competitive public schools and provide for the educational needs of their children. Property tax revenue from impoverished communities represents a smaller percentage of overall annual public school expenditures than in more affluent communities. The connection between the high cost of housing and the number of individual public school districts is demonstrated by the fact that the residents of more affluent communities can afford the high cost of housing, including high property tax payments that result in part, from the high cost of public education.

The fluctuating economic conditions of housing and the commercial stability of the hamlets in which housing is located can cause a divide between those who possess the means to provide competitive educational opportunities to their students, and those who lack sufficient resources and can only support the most basic features of a good education.

Lower income communities are at a disadvantage because they cannot afford to raise the taxes necessary to support the costs associated with maintaining competitive public schools.

Town of Huntington- Public Transportation

The Huntington Area Rapid Transit (HART) system, owned and operated by the Town of Huntington, provides service to a population of approximately 200,000 residents within the Town's 100 square mile area. Its 20 bus active fleet supports a peak hour requirement of 10 buses in fixed route mode and 5 buses in demand response

mode. HART has a rider ship of 275,500 during a fiscal year with operating expenses totaling over three and half million dollars.

HART bus services primarily link the core residential communities of Huntington with commercial and employment centers as well as to the network of regional bus routes operated by Suffolk County Transit and MTA Long Island Bus (Nassau.) HART also provides regularly scheduled bus service to three of Huntington's four LIRR stations: Huntington, Greenlawn, and Northport.

Reciprocal transfer agreements are in effect with both Suffolk County Transit and MTA Long Island Bus, permitting riders to travel fairly seamlessly by bus throughout Long Island. HART participates in the LIRR's Uniticket Program that allows transit users to combine their rail and bus fares into a single pass. HART also accepts TransitChek-Vouchers that are designed to take advantage of tax incentives for commutation-related use and sold by Transit Center to employers for issue to workers who use public transit.

While demand-responsive paratransit is operated town-wide, HART fixed buses serve the Hamlets of Huntington, Huntington Station, East Northport, Greenlawn, Centerport, Commack, and Cold Spring Harbor, as well as the Village of Northport. Major traffic generators served by HART include Huntington Village, Walt Whitman Mall, Huntington Square Mall, Macy's Plaza in Commack, Huntington Hospital, Dolan Family Health Center, Northport VA Medical Center, Town of Huntington Senior Citizens Nutrition Center, East Northport, Greenlawn, and various medical groups. Two HART bus routes make coordinated connections with Suffolk County Transit's most heavily traveled route, S-1 that serves the major employment center along the Route 110 corridor in Melville. Suffolk County also provides east and west service through Hauppauge and Patchogue with coordinated connections to HART.

Two HART routes operate as weekday, peak-period, and rail feeders, and are coordinated with LIRR schedules at the Huntington Station. These routes benefit NYC-bound commuters.

Three other daily fixed routes provide basic transportation Mondays through Saturdays within the Town of Huntington, generally with hourly headways.

HART paratransit operations are in full compliance with ADA complementary paratransit requirements. Both mandated and elective trips are provided. Although the majority of paratransit trips are for social, nutrition, and medical purposes, HART does also regularly provide employment-and –educational-related trips to disabled persons.

Town of Huntington- Private Home Financing

Home ownership rates are important to a community's financial well-being. Prospective homebuyers expect to have access to mortgage credit, and programs that offer home ownership must be available without regard to race, gender, national origin, religion, ability or disability, familial status of national origin. All persons must have the ability to live where they want and can afford.

Access to mortgage credit enables residents to own their homes, and access to home improvements loans and refinancing allows them to keep their homes in good condition. All of this helps keep neighborhoods attractive and residents vested in their communities.

Inadequate lending performance results in various long term and far ranging community problems, and of these, disinvestment is probably the most devastating. Disinvestment in a neighborhood by its lenders reduces housing

finance options for borrowers and weakens competition in the mortgage market for low and moderate income neighborhoods. High mortgage costs, less favorable mortgage loan terms, deteriorating neighborhoods, reduced opportunities for homeownership, reduced opportunities for home improvement and the lack of affordable housing are only a few of the consequences of inadequate lending performance. Financial decay in the business as well as in the private sector is also a result of disinvestment in the form of business relocation, closure and bankruptcy.

Significant changes have occurred in the lending market not only in the Long Island but throughout the United States. The number and type of lenders have changed over the past five years, and it is becoming a common occurrence to read about national lenders buying local lenders. These national lending institutions are becoming increasingly more active locally, as the market share of national corporations is growing yearly.

Since most housing transactions occur in the private sector, and are not significantly impacted by the local governments, we examined the Home Mortgage Disclosure Act (HMDA) data and determined that in the Nassau/Suffolk region, minorities have a lower likelihood than whites of obtaining mortgage loans either privately or through government programs. This is true for all income groups; the data also does not identify whether or not the loans are subprime or prime overall the data does not provide sufficient detail to draw any specific conclusions about the Town of Huntington.

Using available software data relating to the Community Reinvestment Act, the banks serving Huntington seem to be working in low and moderate-income areas throughout the Town. According to the statistics, the Community Reinvestment Act Compliance does not seem to be an issue.

Recent studies by Stony Brook University report that racial segregation continues to be a major detriment to fair housing choice on Long Island. Much of the current racial segregation on Long Island is the result of how Long Island was developed and the government policies in effect at that time.

Forms of institutional racism were included in some provisions of the National Housing Act of 1934 that created the Federal Housing Administration's (FHA) mortgage guarantee program. In 1949, the Supreme Court found that the FHA Program involving public funding for homeownership violated the United States Constitution by permitting the federal government to discriminate against people based on race. This ruling applied to public funds and it wasn't until the Civil Rights Act of 1968 that racially restrictive covenants and other forms of discrimination in housing became illegal for private and public entities alike.

Since almost all of the Huntington's population was developed after World War II and before 1970, these federal and private lending policies helped to create suburban communities that were racially segregated.

While these policies and practices are no longer legal today, their practice has had a lasting impact on where minority households are located in Huntington with the majority of them concentrated in a limited number of communities. With over 80% of Huntington housing stock built before 1970 this added to the development of Huntington's population. People will also move to hamlets that have people like themselves; this could be religion, ethnic background, language, friends, fire districts, and school districts are all reasons a person chooses a hamlet.

Long Island Housing Services (LIHS) is a private, non-profit agency that investigates housing discrimination complaints and tests for housing discrimination on a random basis. The major activity at LIHS is case by case enforcement of fair housing laws when individual persons or families encounter specific incidents of discrimination that violate those laws.

In 2020 alone over 100 discrimination cases were investigated by Long Island Housing Services.

Identification of impediments to fair housing choice

Assessment of current public and private fair housing programs and activities

Concern: Funding

Need for consistent funding for social services. Our past national recession and downturn of the economy have caused a significant reduction in the funding sources for all agencies and not for profits in the Town of Huntington, while those same adverse economic conditions placed higher than ever demands on those services. Funding sources, whether local, state or federal, are diminishing. Organizations are putting in more time looking for funds than meeting the needs of the low and moderate income population.

Government agencies and not-for-profit providers who administer programs and services to low and moderate income families have to constantly evaluate the services they provide and work directly with other providers, or send them to other not for profits or agencies because they cannot provide the needed services. Low and moderate income families with the proper support they can have the advantage of living and operating from a stable home.

Concern: Sewer Infrastructure

The absence of available sewage treatment plants is a major environmental concern. Only 11% of the Town of Huntington is connected to sewer treatment plants resulting in low density housing. Lack of sewage treatment plants is a particularly expensive and difficult problem on Long Island, which relies on underground drinking water supply. The cost of constructing sewage treatment plants increases the cost of new housing, and in many cases, discourages it altogether.

The Town of Huntington is Preparing to install up to \$44 million dollars in funding towards adding a sewer line down the main corridor of Huntington Station along NY-110. This will allow for new development of housing stock to be produced in this area. The Town has been making significant upgrades to the existing monitoring equipment, capacity of the sewage treatment facility over the past several years. As a part of a state mandated program to upgrade treatment facilities, some increased capacity can be realized. In addition, the southern part of Huntington continues to hook up to the extensive sewage network serving the south shore of Long Island through Suffolk County. The County is also working with state and federal agencies to secure funding for the construction of new sewage treatment plants and to upgrade existing plants and infrastructure to enable additional capacity.

Concern: Community Resistance

Another concern to a multi-family zone change is community resistance; also known as “NIMBYism.” Some residents do not want anything built at all and in those cases when they do, often support higher income housing in hopes of increasing their own property values. With eight separate school districts funded by local property taxes, there has been reluctance by members of the community to support the construction of multi-family units because of the perception that this housing will be a financial drain on their district. Racial issues are rarely voiced, yet are an unspoken factor in some cases.

The Huntington Community Development Agency has confronted and overcome so-called NIMBYism through pro-active public outreach. Our approach is to make the community involved in the process and keep them informed on the positive economic and social benefits of affordable housing. To alleviate some of the school concerns we must work with non-profit agencies to educate people in the school district as to the benefits both financially and socially of affordable housing developments. The Agency urges the federal government to provide financial incentives to schools that support affordable housing.

Concern: Handicap accessibility

The limited access of the physically handicapped to use of public building and facilities, recreational facilities and even housing can create economic and housing discrimination as well as a restricted quality of life.

The Town will continue to implement projects that are designed to remove architectural barriers facing the handicapped. The removal of architectural barriers in public buildings and public restrooms, access to parks and recreational facilities helps to generally improve the quality of life for the handicapped. The Town's home improvement program will help low and moderate income families make their homes accessible. The Town also has a Handicap Advisory Board to advocate for those who are physically challenged.

Concern: Restrictive lending environment

The lack of financing opportunities and knowledge of the banking system to certain segments of the population is a concern in achieving fair housing choice.

The Town of Huntington via Huntington Community Development and other housing partners will work with local lenders and real estate professionals to promote tools that enable individuals to rent and/or achieve homeownership. This is especially important in maintaining stability in those neighborhoods and communities where homeownership and rental housing have been facilitated and supported by the Town's efforts. The need for mortgage counseling is critical to help not only first time homebuyers, but in dealing specifically with those that have fallen prey to predatory and fraudulent lending practices, many of whom are now in default and under threat of foreclosure.

Concern: Inability to achieve homeownership

There is a need to increase homeownership opportunities for lower and moderate income residents in the Town of Huntington. A common concern raised by residents who are renters is that their rents are as high or even higher than mortgage payments and they would be able to afford a home if they had some financial assistance to buy one.

While the Town does not qualify for HOME funds directly, we made our fiscal year correspond with Suffolk County so Huntington residents would be able to apply for funding through Suffolk County for down payment assistance. Income eligible applicants are given the opportunity to purchase a house in the neighborhood of their choice.

Concern: Lack of success in affordable housing lotteries

It has been brought to the Agency's attention that there is a portion of the low-moderate income population, and in many cases the minority population, that is unable to meet the federal criteria necessary to occupy affordable housing created by the Town's legislation.

History shows that not all who enter an affordable housing lottery ultimately qualify for a unit. To address concerns that the eligibility standards utilized to determine qualification for affordable housing are too high, the Town and CDA reiterate that the standards used are those established by the Department of Housing & Urban Development (HUD). In its continuing efforts to assist individuals seeking affordable housing, the Town intends to facilitate, in partnership with the Ministerial Alliance and on its own, housing education and counseling seminars aimed at those who have been unsuccessful in moving forward in affordable housing lotteries in the past as well as those who may be attempting to enter an affordable housing lottery for the first time. It is the hope that such efforts to help individuals better understand the application process and the eligibility requirements, as well as the importance of one's financial and credit status, can go a long way toward ensuring a more favorable outcome in future affordable housing lotteries.

Clarification: A lingering question of segregation of multi-family housing

It has been brought to the Agency's attention that a question and concern remains with some regarding a perception of segregation of multi-family housing, together with the assertion that the Town appears to approve multi-family housing developments, solely within "areas of minority concentration."

The Agency rejects the above as a legitimate concern for inclusion in this Analysis of Impediments Report. However, unless and until this perception is addressed by way of documentation and fact, it can and will remain a "concern" in the eyes of some. The Agency therefore wishes to use this report as a venue by which to both address the question and properly acknowledge those who pose it.

Over the previous twenty years, the vast majority of non-age restricted, multi-family housing constructed in the Town has been, in fact, constructed outside of the six census tracts that are the focus of such questions and concern. More specifically, the Town has approved the construction of over 1,000 units of multi-family housing in the Melville-area, consisting of the Avalon Court, Villages, and Millennium Hills developments. In addition, the complex Matinecock Court which will provide 136 affordable units has been approved for construction. In addition there are projects in the approval stage that will provide roughly 36 and 19 rental units.

The Town and the HCDA are ever mindful of the need for housing options for all individuals and families throughout the Town. Of relevance to note is the Town itself does not select where multi-family housing, or any housing for that matter, can or will be located, but rather, the private developer makes that determination based on land availability. The Agency also points out that minorities, as do all of the Town's populations, reside in single family homes being constructed throughout the Town.

With regard to the recent surge in development of age-restricted (senior) housing in the Town, it is important to note that the current focus of private developers on this type of development is a national trend. This trend is in direct response to the needs of the market, namely the aging baby boomer population now looking to transition into housing that is more suitable to their needs. That is clearly reflected in Huntington, with seniors (as of the 2020 Census) making up approximately 27% of the Town's population with the highest population percentage being those 40-59 years old. This continues to show an increased need for senior housing. We further note that minorities do in fact respond to both the market rate and affordable housing units within proposed and existing age-restricted communities.

Conclusion

There is a significant difference between real and perceived discrimination. The criteria used by many Federal, State and County programs that assist low-moderate people with funds for housing may actually inhibit their housing choice, but are not illegal. As an example, HUD guidelines regarding occupancy standards limit the number of persons in a household to standard size housing unit. Therefore, a six person family who cannot be awarded a one-bedroom assisted –housing unit, as the unit would be considered sub standard for a family of that size. To some cultures and persons, this may seem to be an unfair practice.

This comprehensive analysis of impediments pertaining to fair housing issues within the jurisdiction of the Town of Huntington reveals the cost of housing and property taxes are the greatest impediment to fair housing choice for all populations. Therefore, the principle of fair housing priority in Town of Huntington is rooted in a need for more affordable housing units. How to get there, with decreasing financial support from the federal government and other sources, remains an ongoing question and challenge.

The most plausible way of reducing racial discrimination is through educational and advocacy agencies that can share legal remedies and information that can protect individuals and to make sure they know their rights in pursuit of fair housing.

The Town and Huntington Community Development Agency understand and recognize that, despite the Town's many accomplishments to date, the need for affordable housing of all types and sizes continues to exist throughout the Town. The Town and the HCDA pledge to continue working closely with housing advocates and groups to ensure best efforts and fairness to all concerned in attempting to address the affordable housing needs of the community, given the inherent development and economic challenges, and federal regulations that govern its disposition and administration. This partnership must include open communication, education, and a desire to understand and accept mutual realities.

Section III – Monitoring Performance

On an annual basis, the Town of Huntington will provide the actions it has taken to reduce the impediments to fair housing. This information will be provided in the annual Consolidated Action Plan Evaluation Report (CAPER) submitted to HUD. The CAPER will be made available to interested citizens and will allow interested citizens the opportunity to comment on the Town's performance prior to submitting the documentation to HUD.