

Long Island Housing Services, Inc.

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Attn: Master Plan Comments

Nassau County
Planning Department
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Mineola, NY 11501

Executive Director

Michelle Santantonio

Dear Deputy Director Sood,

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Long Island Housing Services, Inc. (LIHS) is a private, not for profit 501(c)(3) corporation whose primary objectives are to promote racial and economic integration and equal housing opportunity throughout Long Island and to eliminate unlawful housing discrimination, to encourage the development of low income and affordable housing and to educate and assist the public regarding housing rights and opportunities. As a unique Fair Housing advocacy and enforcement organization, we have worked to serve Nassau County government and residents since 1991 (in Suffolk since 1969). Based on our experience providing services to Nassau County, LIHS appreciates the opportunity to provide input on the Draft 2010 Nassau County Master Plan. (Draft Master Plan). Please note that our ability to provide services has been supported through federal funds administered by Nassau County (Community Development Office) through the Community Development Block Grant (CDBG) program.

Consultant

Janet Hanson
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The Draft Master Plan states that Nassau County has the third highest affordability index of the four suburban counties studied. Home values rose nearly 110 percent while median household income rose only 19.3% LIHS agrees that the high affordability index may be the reason that young people who grew up in Nassau County are unable to afford to return to the county to raise their children and why older people reaching retirement sell their homes and relocate outside of the county. It is essential that the county develop affordable housing that is attractive to younger people so that we can retain the working population that will support the county's aging population. It is equally important that the county support the construction of affordable accessible housing so that older residents can remain in the county rather than relocating to areas that have lower affordability indexes.



The Draft Master Plan states that 40% of the homeowners with mortgages pay over 35% of their income toward the mortgage. HUD uses a rule of thumb of that sets housing costs greater than 30% of household income as unaffordable. Nassau County saw 4481 foreclosures in 2008 a 25.8% increase over 2007. The county ranked fourth in foreclosures and accounted for 9% of all statewide foreclosures. High concentrations of foreclosures are found in predominantly racial/ethnic minority

A 501 (c) (3),
not-for-profit,
fair housing
agency serving
Long Islanders
since 1969.

*Our mission is the elimination of unlawful housing discrimination
and promotion of decent and affordable housing through advocacy and education.*

areas. Historically and recently patterns of targeting vulnerable communities segregated by race and national origin are often targeted for discriminatory, predatory lending and real estate related abuses. These groups are more vulnerable, too, often due to historical racially discriminatory practices and denial of equal opportunities and terms to purchase housing. Such groups are too often unfamiliar with mortgage processes and lack familial resources to guide and help avoid scammers and unsupportable loan terms. Sadly, these trends continue to be apparent. More current statistics indicate that between February 13, 2010 and August 31, 2010 Nassau County accounted for 10.2% of the pre foreclosure notices in New York State which was the third highest share in the state. Foreclosure rates are highest in the largely minority communities of Roosevelt, Freeport, Uniondale, and Hempstead.

LIHS concurs that the high affordability index and the fact that 40% of homeowners with mortgages have mortgages that are unaffordable probably accounts for the high foreclosure rates. This is particularly true in minority areas where the assumption is that more than 40% of the homeowners have unaffordable mortgages. These homeowners suffered most in the economic downturn in the recent recession and a wage earners job loss, loss of overtime pay or medical emergency for an uninsured family contributes to homeowners' inability to meet mortgage payments. In this crisis, renters are also negatively affected, finding themselves threatened with homelessness as the house goes into foreclosure. Without proper counseling, tenants are often treated without regard to their lawful rights to proper notice, according to recent amendments in NYS law.

To address the flood of those affected, there is a lack of adequate resources devoted to helping homeowners who are in foreclosure. We applaud Nassau County's efforts to counsel first time homebuyers, victims of predatory and fraudulent loans and those who are in default or in imminent danger of foreclosure. Long Island Housing Services is also a HUD-approved Counseling agency and available to assist Nassau County homeowners who are victims of predatory lending and homeowners who are delinquent in their mortgages by providing housing counseling to prevent predatory lending. We have increased staff through support of the Housing Trust Fund Corporation which has increased our ability to help owners avoid foreclosure and maintain their homes with more affordable loan terms. We are now also able to provide direct legal services for those facing foreclosure without charge.

LIHS concurs with the conclusion of the Draft Master Plan that the rehabilitation of foreclosed homes will stabilize neighborhoods. We encourage outreach through affirmative marketing according to federal guidelines to reach a broad spectrum of the population in searching for buyers of foreclosed properties. This could be promoting opportunity, affirmatively furthering Fair Housing by helping integrate communities racially and economically. Restricting purchase to qualified first time buyers, rather than allowing sales to investment entities or market speculators will help ensure stabilization and increase affordable opportunities.

The Draft Master Plan asserts that there is a disparity between the housing stock in Nassau County and the size of households in Nassau County. Approximately half of County residents reside in households of one or two people although only 10% of Nassau County's housing stock is comprised of studio and one bedroom apartments or homes. This lack of smaller size apartments and homes has resulted in the proliferation of illegal apartments that are often not in compliance with zoning or building codes. LIHS supports the development of the Nassau County Master Plan's recommendation for more multifamily and transit-oriented development in Nassau County. New and affordable housing for rental and sales should be constructed in areas that would promote housing integration in areas of opportunity - and deter increased segregation by race, ethnicity. There is great need to support and

promote such integration. We encourage the updating of municipal and building codes to remove limitations on access to rental opportunities in owner occupied accessory apartments. We support the design and construction of multifamily and transit oriented housing that will comply with federal and state requirements for accessible design and construction and will meet the needs of county residents who require accessible housing. LIHS encourages programs that would promote housing providers and housing consumers' awareness of fair housing provisions that mandate accommodation and modification to make more housing accessible to our elderly and increasingly disabled population. We encourage Nassau County to adopt "visitability" and universal living design standards in all new construction to allow for access for people with disabilities. Such design features benefit all.

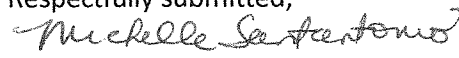

The Draft Master Plan states that that Nassau County has a relatively small supply of rental housing and indicates that, due to the fact that demand for rental housing is high, rental costs are also high. The county's median rent is \$1,334 but more than 37% of the renters pay more than \$1,500 per month in rent. "Nearly 44 percent of all household renters in Nassau pay 35 percent or more of their income toward monthly toward rent." The median age for households in the county is forty (40) but the median age for cost burdened households is thirty one (31) to thirty four (34) years. The construction of smaller, more affordable, energy efficient units would enable younger renters to stay on or return to Nassau County. If these units are transit oriented developments this would enable renters to forego the expense of a car and would encourage the use of public transportation and shopping in downtown communities. Affordable rentals can lead to ability to stabilize, generate savings to ultimately invest in sustainable homeownership.

LIHS would encourage the County to promote integrated housing in the more affluent communities. LIHS encourages affirmative marketing to promote integrated and balanced communities and the creation of financial incentives to encourage prospective tenants to move outside of racially segregated high poverty areas into more culturally diverse higher income/higher opportunity areas within the county. LIHS advocates for changes in the requirements for town subsidized senior citizen cooperatives so that residency in a specific school district is no longer a requirement. This would help integrate these communities. LIHS supports updating municipal codes to remove limitations on access to rental opportunities in owner-occupied accessory apartments. This would be advantageous to older residents who can no longer afford to remain in their homes without some financial assistance and would create opportunities for young people to find decent, affordable rentals. It would also encourage more diverse communities as ethnic and racial minorities seeking affordable housing would have access to owner occupied accessory apartments.

Along with lack of adequate and affordable housing stock for renters or homeowners is a major issue to consider: the density of population, the congestion and environmental impact. Population planning and education in this regard is needed, as there are obviously insufficient resources to adequately house and absorb unlimited numbers of people.

LIHS is grateful for the opportunity to comment on the Draft 2010 Nassau County Master Plan. Please do not hesitate to contact me at 631 567-5111 ext.316 or Harriet Spiegelman at 516-292-0400, ext. 318 if we can be of any further assistance.

Respectfully submitted,

 
Michelle Santantonio and Harriet Spiegelman

Executive Director

Projects Facilitator