

3. Impediments to Realizing the Sustainable Development Vision

a. Gaps in the Regional Planning Process

The Sustainable Communities planning initiative was built from a shared vision of the Consortium members to foster livable and sustainable communities and growth centers around existing and planned transit services in the New York-Connecticut planning area in order to enhance affordable housing, reduce traffic congestion, improve the environment and continue to expand economic opportunities. Underlying this is the understanding that TOD is a foundation for sustainable development. TOD, when correctly planned, designed and implemented, provides economic benefits (lower transportation costs, access to job centers), social benefits (public space, mixed-income housing, community resources), environmental benefits (lower per capita energy consumption and greenhouse gas emissions) health benefits (increased walking, lower obesity) and greater convenience in using transportation services. TOD planning is well established in the New York-Connecticut region, and the planning initiative sought to both capitalize on current and earlier efforts as well as to place TOD planning in a more regional context.

The regional transit network is a key part of the Consortium's vision to improve access to opportunity and an increase in transportation options is a key objective identified by the Consortium. The involvement of regional transit providers during initial planning stages of TOD projects is vital. Combining land use and transit planning from the outset helps to identify creative financing opportunities and address any potential obstacles. Several project recommendations in the Implementation Plan require the continued collaboration of transit planners, service providers, municipal planners and community stakeholders throughout the planning process.

Through the planning program, specific gaps have been identified between the sustainability-related elements of existing planning processes

and requirements at various levels – local, county/ regional planning organization (RPO), regional/ metropolitan planning organization (MPO), and state – that impact the Consortium's shared sustainable development vision to foster livable and sustainable communities and growth centers around existing and planned transit services in the New York-Connecticut planning area in order to enhance affordable housing, reduce traffic congestion, improve the environment and continue to expand economic opportunities.

Assessment of these planning gaps has also contributed to defining a more coordinated planning process for regional sustainability planning generally. The assessment is based on an analysis of regional, county and municipal plans that identified commonalities, differences, overlaps and alignment with the Livability Principles promulgated by the federal Partnership for Sustainable Communities noted earlier.

In order to perform these assessments and analyses, the planning process first established the elements of "sustainability" planning to guide both the assessments of the planning gaps and the development of the shared sustainable development vision described earlier, within the context of the federal Livability Principles. The following diagram identifies the various functional areas determined by the planning program to comprise sustainability planning, while the sections which follow explore the planning gaps themselves.



I. INTEGRATING REGIONAL AND LOCAL TRANSPORTATION PLANNING

Transportation planning in the New York-Connecticut planning area takes place at various levels determined by both federal regulations, state laws and regulations and the jurisdictional roles and responsibilities of the owners and/or operators of different components of the transportation system. Regional transportation planning is undertaken by MPOs through a continuing, cooperative, and comprehensive (“3-C”) planning process. “Consultation” has become an important fourth “C” in the process. Federal law requires metropolitan transportation plans and programs to be developed for all urbanized areas by MPOs. MPOs are policy boards of organizations created and designated to carry out the metropolitan planning process. Generally, these boards are comprised of the chief elected or appointed officials of federal, state and/or local entities with ownership of or jurisdiction over significant components of the transportation system and general purpose local government that together comprise at least 75 percent of the affected population including the largest incorporated city based on population.

MPO planning is by necessity and mandate focused

on the federal-aid eligible components of the transportation system to enable federal funding. The scope of the metropolitan planning process also provides for implementation of projects, strategies, and services that will address federally-prescribed planning factors. This being the case, MPO planning involves the production and maintenance of required planning products whose completion determines funding eligibility. The format and contents of these products are heavily prescribed by federal regulations and the resulting planning process is focused on the areas where federal funding can be applied: largely transportation system preservation and capital improvements which impact system capacity. All MPOs produce both long-range regional transportation plans (RTPs) and transportation improvement programs (TIPs) that establish eligibility for federal funding. Additionally, the most recent federal authorizing legislation has introduced a requirement for performance-based planning based on broad national goals, several of which are related to sustainability.

More locally, counties and municipalities in the New York-Connecticut planning area, including the City of New York, are responsible for the maintenance of local, county and, in some cases, state roadways under their jurisdictions as well as transit services at

the county level and in several municipalities. Their planning is focused on the capital and operational aspects of those systems, which usually exist wholly within their borders.

In the New York-Connecticut planning area, both state's departments of transportation are responsible for large sections of the roadway network and either provides transit services directly or provide funding to transit operators. Two major regional transit operators provide the majority of the transit services in the planning area: the Metropolitan Transportation Authority (MTA) in New York and Connecticut Transit in Connecticut.

The MTA is a public authority with jurisdiction over buses and subways in New York City and commuter rail in surrounding suburban counties. MTA also operates commuter rail service in southwestern Connecticut under contract to the Connecticut DOT. Connecticut Transit, known as CT Transit, is the Connecticut DOT-owned bus service. CT Transit provides bus service via contract providers for seven different metropolitan areas in the state.

Other transit service providers in the New York-Connecticut planning area include five county-based bus transit services operated by contract service providers under county management. These services are provided in Nassau and Suffolk counties on Long Island and in Putnam, Rockland and Westchester counties in the lower Hudson Valley. Additionally, in southwestern Connecticut, the Greater Bridgeport Transit District and the Norwalk Transit District provide fixed route and demand response service to their respective service areas.

STEPS NEEDED TO IMPROVE PLANNING INTEGRATION

Greater integration of transportation planning means a better alignment of federal and state transportation funding with local municipal transportation needs. MPOs provide an avenue for coordinating the planning of transportation agencies within each state. The regional transportation plans produced by the MPOs and the capital and strategic plans of transportation agencies contain robust analysis and actions for capital, service and policy to alleviate congestion, promote safe transportation options and prepare for future growth.

Gaps in the planning process exist primarily between

planning and resource allocation between the two states (as well as with New Jersey) and between the planning at the regional and local level in New York. Overall, these gaps are in good measure due to the allocation processes, usually based on complex formulas, which bring federal and state resources to MPOs, local municipalities, and local transit providers. Although regional planning requirements call for detailed estimates of need at the regional level in both the near-term and long-term, the availability of federal and state resources is determined through legislative and budgetary processes and funding source requirements at those levels and is not fully reflective of regional and local need.

In New York, there is a need to better integrate the capital, service, and policy planning of New York City and the suburban counties within a regional context. Although the MTA is by far the largest operator of transit service, it is not the only one. The suburban counties surrounding New York City all operate independent bus transit systems, while MTA operates commuter rail service in those counties. Roadways and bridges fall under multiple agency jurisdictions throughout the region. The result is the development of capital, service, and policy plans from multiple political and policy perspectives. As an MPO, the New York Metropolitan Transportation Council (NYMTC) does integrate these disparate planning processes, but its mandated focus is on the federally-financed components of the system.

In contrast, the three Connecticut MPOs in the New York-Connecticut planning area are much smaller organizations derived from regional planning organizations (RPOs) comprised mainly of local municipal governments. Since the State of Connecticut abolished county government in 1960, there is no intermediate level of municipal government between cities and towns and the state. Thus the local municipalities in Connecticut are directly represented in the RPOs and, by extension, in the MPO planning process.

Existing coordination among MPOs in New York, Connecticut, and New Jersey could move toward more specific integration of planning and programs. Five MPOs in the three state region – the North Jersey Transportation Planning Authority in northern New Jersey, NYMTC in New York State, and three MPOs in southwestern Connecticut, two of which are in the New York-Connecticut planning area – have joined through a memorandum of understanding to

create the Metropolitan Area Planning (MAP) Forum to better consult and coordinate their planning activities. However, there is currently no formal or mandated mechanism for the joint development, review, and acceptance of required planning products such as the Regional Transportation Plan, Transportation Improvement Program and Unified Planning Work Program.

Better integration among MPOs and the local municipalities within their planning jurisdictions is another mechanism for improved transportation planning in New York. In this regard the structure of NYMTC is fundamentally different than that of the three Connecticut MPOs in the New York-Connecticut planning area. NYMTC is comprised of the City of New York and five surrounding suburban counties on Long Island and in the lower Hudson Valley, as well as New York State and the MTA. Local municipalities in the suburban areas of NYMTC's planning jurisdiction – which number 201 cities, towns and villages -- are represented in NYMTC by the county in which they are located. However, NYMTC has worked within this structure to strategically establish better partnerships with local municipalities.

As described above, regional transportation planning falls within the purview of states, MPOs and regional transportation providers. Local transportation planning is accomplished through the various planning and budgeting processes of local, cities, towns and – in New York State – counties and villages, as determined by municipal charters. Local transportation needs and plans are most often represented as components of local master plans or comprehensive plans.

POSSIBLE APPROACHES TO PLANNING INTEGRATION

A coordination process of some sort could be established as a formal legislated process or as a more informal clearinghouse-type arrangement. Regardless of format, a process of comparing the planning policies of different governmental levels in order to attain compatibility between local, regional and state plans and resource allocation is needed. This consensus-building approach is used for plans of conservation and development in Connecticut and also was adopted by the State of New Jersey as a way to achieve vertical plan consistency while preserving local home rule.

It is recommended that the MAP Forum be considered as a mechanism for greater integration and coordination of transportation planning products and resource allocation. If used for this purpose, the scope and structure of the MAP Forum should be adjusted to better fulfill these aims.

Another, more spatially-specific approach to better integrating transportation planning at multiple levels could involve counties in New York and regional planning organizations in Connecticut convening transportation service providers and local municipalities in critical transportation corridors to solve larger scale problems and/or convening impacted municipalities around larger transportation improvement projects. Coordinated statewide and MPO transportation plans could provide the targeting mechanism for selecting transportation corridors and/or projects where this approach could be employed.

II. PRIORITIZING AREAS OF GROWTH AND CONSERVATION

The Constitution of the United States does not mention local governments. Instead, the Tenth Amendment to the Constitution reserves authority-giving powers to the states. It is not surprising, then, that there is a great diversity in state-local relations between, as well as within, states. This means that to speak of local government in the United States is to speak of more than fifty different legal and political situations.¹

Home rule is a delegation of power from the state to its sub-units of governments (including counties, municipalities, towns or townships or villages). That power is limited to specific fields, and subject to constant judicial interpretation, but home rule creates local autonomy and limits the degree of state interference in local affairs. The powers and limits of home rule authority for local governments are defined state-by-state by each state's constitution and/or statutes enacted by its legislature.² When a municipality or other political subdivision has the power to decide for itself whether to follow a particular course of action without receiving specific approval from state officials, it acts pursuant to such

1 National League of Cities; Local Government Authority; website.

2 National League of Cities; Local Government Authority; website

powers.³

Both New York and Connecticut are “home rule” states which grant cities, municipalities, and counties the ability to pass laws to govern themselves as they see fit, so long as they obey the state and federal constitutions. Home rule authority has been upheld as a source of zoning and planning power for local governments. Therefore, home rule authority grants municipalities great flexibility in dealing with local regulation of land use.

A fundamental tension pervades land use planning in New York. As a strong home rule state, New York delegates to each town, village, or city the authority to approve, disapprove, or modify land use planning and zoning. Yet under New York State law, county planning departments are also required to review and make recommendations on those projects that could have inter-municipal impacts. While municipal boards ultimately determine whether projects are approved, county planning departments’ recommendations can carry significant political weight and sometimes play a major role in determining the fate of land use planning and zoning projects.⁴

Similarly, in Connecticut, land use decisions are primarily made at the local level by boards and commissions that are made up of local residents who are either elected or appointed, depending on the municipal charter. Each municipality in Connecticut is responsible for managing land use and development within its borders. This is done through a variety of mechanisms established by the state legislature, which are primarily found in Title 8 of the Connecticut General Statutes.⁵ Since county-level government in Connecticut was abolished in 1960, the county-local municipal interplay in land use matters described above in New York State does not exist for Connecticut’s municipalities. However, over time, the State of Connecticut passed legislation establishing 15 regional planning organizations (RPOs). Unlike county governments, the authority of these RPOs is limited to land use planning, infrastructure development, emergency preparedness, transportation planning, and long-term planning for population and economic changes for the communities within their respective

jurisdiction. The RPOs have no taxing authority; they are financed by funds from the federal government, the state, and member towns.⁶

In both states, responsibility for decisions on land development, growth, and conservation falls to local municipalities – the cities, towns and villages established in or incorporated under the states’ constitutions. A more regional perspective on land use planning is provided through the interaction between local municipalities and counties in New York State and between local municipalities and RPOs in the State of Connecticut.

New York State’s zoning enabling statutes (the state statutes which give cities, towns and villages the power to enact local zoning laws) all require that zoning laws be adopted in accordance with a comprehensive plan. The comprehensive plan should provide the backbone for the local zoning law. “Comprehensive” has been defined as “covering a matter under consideration completely or nearly completely: accounting for or comprehending all or virtually all pertinent considerations.” From a planner’s perspective, a plan is inclusive and comprehensive when it addresses a wide range of planning issues, perhaps through a series of component, topic-related plans. These components could include such matters as transportation patterns and future needs, natural and built resource inventories, and population trends.⁷

Counties in New York State also undertake comprehensive planning in order to fulfill a number of functions, including economic development, transportation and land use considerations. These plans are often used to fulfill the responsibilities of counties to review and make recommendations on those development projects that could have inter-community impacts.

In Connecticut, Chapter 126 of Section 8-23 requires that a local planning and zoning commission “prepare, adopt and amend a plan of conservation and development for the municipality” and that the plan be updated at least once every 10 years. A community’s land use regulations, its zoning ordinance, and its subdivision regulations should promote the goals and strategies of its Plan of

3 Stinson, Joe; New York’s Home Rule Authority in the Land Use Context; Pace University

4 Mall, Jennifer Anne; Autonomy, Justice and Expertise in Land Use Planning: How Home Rule Shapes Thought and Policy in One New York Town; Humboldt State University

5 Connecticut Department of Energy & Environmental Protection; website

6 “The Relationship Between State and Local Government,” page 22 in Connecticut: A Guide to State Government, The League of Women Voters of Connecticut Education Fund, Inc., 2003.

7 New York State Department of State; Zoning and the Comprehensive Plan

Conservation and Development (POCD) or Master Plan. These regulations are the most important tools a community has for implementing its POCD or Master Plan.⁸ The purpose of a Plan of Conservation and Development is to record the best thinking of the town as to its future growth and to give direction to both public and private development. The Plan should encompass a long-term vision of the community but also offer guidance for short-term decision making.

Additionally, RPOs are responsible for producing a regional plan of conservation and development that identifies a vision for the region. Under Section 16a-4a of the Connecticut General Statutes, the Office of Policy and Management (OPM) is responsible for the designation and redesignation of logical planning regions within the state. The purpose of the regional POCD is to identify issues that are regional in nature and offer recommendations to solutions requiring regional cooperation. The regional POCD bridges the gap between the State of Connecticut's Conservation and Development Policies Plan and municipal POCDs, which necessarily focus on the specific needs of each city or town. OPM is responsible for preparing the state plan and seeking consistency with local and regional plans.

Thus in both states, the local municipal land use decision-making authority is grounded in master planning requirements at both the local municipal and either county or RPO levels. Thus planning for growth and conservation is focused at these levels and accounts for related issues of population, housing, and transportation that are limited to local municipal boundaries or county or regional planning areas. And priority areas of growth and conservation are also defined at these scales.

There are other structural differences between the two states in the New York-Connecticut planning area. The area's central city is in New York. Although there are four smaller RPOs in Connecticut within the Consortium's planning area, there is a single large MPO in the New York portion of the planning area which contains ten counties and 202 municipalities. That MPO – NYMTC -- does not have specific land use responsibilities, but includes land use attributes in its forecasting process and recognizes transportation-land use linkages. In some cases, counties in New York have banded together to take a more regional, although advisory, perspective on development and

growth. Examples include the Long Island Regional Planning Council and the Hudson Valley Regional Council. And, of course, the City of New York provides a regional framework for five counties – the City's five boroughs – which are within its jurisdiction. While the regional POCDs in Connecticut and county master plans in New York generally reflect and are built upon local master planning, the finer-grained land use priorities of municipalities are not always reflected in regional plans at larger scales.

POSSIBLE APPROACHES TO PLANNING INTEGRATION

More robust linkages between county master plans in New York and regional POCDs in Connecticut, and larger-scale regional transportation and development plans would improve the regional prioritization of areas of growth and conservation in the New York-Connecticut planning area. These linkages could be established through cross-acceptance of plans to better align and rationalize this prioritization. Efforts to coordinate planning on a bi-state level to target housing, economic development and transportation investments would require a framework that provides common nomenclature and criteria, but remains flexible enough to accommodate differences between the two states and different sub-regions within the Consortium planning area.

III. INTEGRATING TRANSPORTATION, HOUSING, AND ECONOMIC DEVELOPMENT WITH TRANSIT-ORIENTED DEVELOPMENT

PLANNING FOR HOUSING

State and local governments which receive funding from the U.S. Department of Housing and Urban Development (HUD) are required to submit a Consolidated Plan as a prerequisite for that funding. According to the HUD website:

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the

⁸ University of Connecticut, Community and Natural Resource Planning Program, website

framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with

activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

Consolidated Annual Performance and Evaluation Report (CAPER). In the CAPER, grantees report on accomplishments and progress toward Consolidated Plan goals in the prior year.

As described in 24 CFR Part 91:

Overall goals. (1) The overall goal of the community planning and development programs covered by this part is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means towards this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing.

(i) Decent housing includes assisting homeless persons to obtain appropriate housing and assisting persons at risk of becoming homeless; retention of the affordable housing stock; and increasing the availability of permanent housing in standard condition and affordable cost to low-income and moderate-income families, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability. Decent housing also includes increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low-income persons accessible to job opportunities.

(ii) A suitable living environment includes improving the safety and livability of neighborhoods; increasing access to quality public and private facilities and services; reducing the isolation of income groups within a community or geographical area through the spatial deconcentration of housing opportunities for persons of lower



Figure viii. Housing under construction in Stamford, CT

AIDS (HOPWA) program. Key components of the Consolidated Plan include:

Consultation and Citizen Participation. Through the Consolidated Plan (often called the “Con Plan”), grantee jurisdictions engage the community, both in the process of developing and reviewing the proposed plan, and as partners and stakeholders in the implementation of CPD programs. By consulting and collaborating with other public and private entities, grantees can align and coordinate community development programs with a range of other plans, programs and resources to achieve greater impact.

The Consolidated Plan. The 3-to-5 year Consolidated Plan describes the jurisdiction’s community development priorities and multiyear goals based on an assessment of housing and community development needs, an analysis of housing and economic market conditions and available resources.

The Annual Action Plan. The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions,

income and the revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.

(iii) Expanded economic opportunities includes job creation and retention; establishment, stabilization and expansion of small businesses (including microbusinesses); the provision of public services concerned with employment; the provision of jobs involved in carrying out activities under programs covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing.

(2) The consolidated submission described in this part 91 requires the jurisdiction to state in one document its plan to pursue these goals for all the community planning and development programs, as well as for housing programs. It is these goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD.

(b) Functions of plan. The consolidated plan serves the following functions:

(1) A planning document for the jurisdiction, which builds on a participatory process among citizens, organizations, businesses, and other stakeholders;

(2) A submission for federal funds under HUD's formula grant programs for jurisdictions;

(3) A strategy to be followed in carrying out HUD programs; and

(4) A management tool for assessing performance and tracking results.

Thus, the Consolidated Plan is a critical assessment

of the jurisdictions receiving funding and it lays out the strategies and policies of these jurisdictions for housing, growth and community economic development.

Another critical aspect of the consolidated plan is its relationship to fair housing legislation. Again, according to the HUD website:

A strong commitment to affirmatively further fair housing is not only one of the Department's guiding principles, it is a requirement for participating in HUD's many housing and community development programs. The Fair Housing Act specifies that the Secretary of Housing and Urban Development shall administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies outlined in (the legislation). This responsibility is assigned to HUD funded recipients as well, through consolidated plans (and other requirements).

The Housing and Community Development Act of 1974, as amended, is the dominant statute for the Community Development Block Grant (CDBG) program. It requires that each federal grantee certify to HUD's satisfaction that (1) the awarded grant will be carried out and administered according to the Fair Housing Act, and (2) the grantee will work diligently to affirmatively further fair housing. This certification to HUD may be implemented through the Consolidated Plan process.

Under the Consolidated Plan, HUD funded recipients are required to: (1) examine and attempt to alleviate housing discrimination within their jurisdiction; (2) promote fair housing choice for all persons; (3) provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin; (4) promote housing that is accessible to and usable by persons with disabilities; (5) and comply with the non-discrimination requirements of the Fair Housing Act.

For local municipal jurisdictions which seek and receive funding through HUD, the key requirements for the consolidated plan track closely with the local comprehensive plan in New York or plan or conservation and development in Connecticut. The basic community assumptions for growth

and development are contained in these planning documents and can form the basis for the local consolidated plan.

Both the State of New York and the State of Connecticut also develop statewide consolidated plans. These statewide plans are developed in consultation with local governments within the state and fulfill requirements for statewide receipt of HUD funding.

PLANNING FOR ECONOMIC DEVELOPMENT

Planning for economic development occurs at a variety of levels and functional areas. At the most local level, comprehensive plans and plans of conservation and development often address economic development strategies and policies for local municipal jurisdictions. These strategies and policies are often translated into the consolidated plans required of local municipalities who seek and receive HUD funding.

In New York State, counties often include economic development planning in their comprehensive and vision planning, while in the State of Connecticut, POCDs at both the regional and municipal level have an economic development component, the comprehensive economic development strategies or CEDS of U. S. Economic Development Administration funding eligibility. County and regional planning organization plans are usually built from the framework provided by local municipal comprehensive plans and plans of conservation and development. Additionally, in New York State, Regional Economic Development Councils were established in 2011 throughout the state to undertake strategic planning for economic development at the regional level. There are three Councils in the New York State portion of the Consortium planning area. Representing a transformational approach, these Councils are public-private partnerships made up of local experts and stakeholders from business, academia, local government and non-government organizations. In southwestern Connecticut, the *One Coast, One Future Comprehensive Economic Development Strategy* provides a regional level of economic development planning for coastal southwestern Connecticut.

Statewide economic development planning also takes place in both states, either as part of each state's

HUD-required consolidated plan and/or through state-mandated economic development plans. Additionally, public authorities and/or public benefit corporations that fulfill specific functions within each state may also produce economic development plans related to their functional jurisdiction.

Generally, economic development planning in both states tends to be parochial, since municipalities, counties, planning organizations, and the states themselves are usually competing with each other in terms of economic development.

PLANNING FOR TRANSPORTATION

As noted earlier, transportation planning in the New York-Connecticut region takes place at a variety of levels determined by both federal planning regulations and the jurisdictional responsibilities of various components of the transportation network. At its broadest level, regional transportation planning is undertaken by MPOs in order to establish eligibility for federal funding for transportation improvement projects. These planning organizations are regional councils comprised of federal, state and local governmental entities with ownership of or jurisdiction over significant components of the regional transportation network.

The MPO planning processes in the New York-Connecticut planning area rest heavily on the capital planning of the member agencies of these regional councils. Each of their members has direct ownership of or jurisdiction over components of the transportation system. In fulfilling their responsibilities, these agencies use capital and operational planning to manage and operate the system components for which they have responsibility. Through this planning, the agencies tap into the federal, state, and local resources they need to fulfill their responsibilities.

At the most local level, municipalities may cover transportation needs and desires in their comprehensive plans and POCDs. Likewise, county comprehensive and/or vision plans in New York and regional planning organization plans of conservation and development usually address transportation planning at the level of each planning area. Additionally, MPOs are responsible for providing a framework for maintaining and improving the transportation system in their planning area. The

blueprint for transportation improvements is presented as the Regional Transportation Plan in New York and the Long Range Transportation Plan in Connecticut.

Per federal transportation planning requirements, each of the states also prepares a statewide transportation plan. According to the Federal Highway Administration website:

States are required to conduct continuing, comprehensive and collaborative intermodal statewide transportation planning that facilitates the efficient, economic movement of people and goods in all areas of the state, including metropolitan areas.

PLANNING FOR TRANSIT-ORIENTED DEVELOPMENT (TOD)

TOD is compact, mixed-use development near transit facilities and high-quality walking environments. The typical TOD leverages transit infrastructure to promote economic development and smart growth, and to cater to shifting market demands and lifestyle preferences. TOD is about creating sustainable communities where people of all ages and incomes have transportation and housing choices, increasing location efficiency where people can walk, bike and take transit. In addition, TOD boosts transit ridership and reduce automobile congestion, providing value for both the public and private sectors, while creating a sense of community and place.⁹

TOD has the potential to benefit low- and moderate-income communities by linking workers to employment centers, creating construction and maintenance jobs, and encouraging investment in areas that have suffered neglect and economic depression.¹⁰ Moreover, neighborhood development restrictions, while potentially in the immediate neighborhood's best interest, can contribute to regional undersupply of housing and drive up the cost of housing in general across a region. TOD development often diversifies the housing in a region, which can lead to improved equitability in the housing market. TOD also reduces transportation costs, which can have a greater impact on low- and moderate-income households since they spend a larger share of their

income on transportation relative to higher-income households.¹¹

However, TOD also has the potential to spur gentrification and displace residents in low-income areas, pushing low- and moderate-income residents farther away from jobs and transit.¹² Recent research confirms that walkable, transit-oriented communities nationwide are becoming increasingly less affordable, and have varying benefits depending on the income level of the residents. Creating mixed-income TOD that serves existing residents is a complex challenge that depends on the specific context of individual communities.¹²

POSSIBLE APPROACHES TO PLANNING INTEGRATION

Achieving TOD requires linkages between planning for housing, economic development and transportation. The assessment of these linkages among the current planning requirements previously described highlights the need for more robust coordination between these different levels and types of planning. Specifically, TOD is most achievable when potential projects are identified at multiple levels of planning. These include local municipal and county (or RPO) comprehensive plans (and POCDs). Other levels include metropolitan regional transportation plans, Regional Economic Development Councils' strategic plans (in New York State), Comprehensive Economic Development Strategies (in Connecticut), and statewide transportation plans and economic development plans. Only then will the coordination between government levels and functional areas be sufficient to provide opportunities for TOD.

To best achieve this, each of these plans could contain specific TOD sections that are coordinated across all levels and functional areas, most likely through some form of the coordination process described in previous sections. Additionally, strategies that support place making should be integrated into transportation, housing, land use and economic development planning at multiple levels through these common TOD sections. TOD projects should be evaluated based on their impacts to

¹¹ Federal Reserve Bank of San Francisco (2010). ["EquippingCommunitiestoAchieveEquitableTransit-Oriented Development."](#)

¹² Talen, Emily, *Prospects for Walkable, Affordable Neighborhoods*, Report prepared for the Oram Foundation, March 2011,, p. 5-8.

⁹ Federal Highway Administration (website)
¹⁰ Federal Reserve Bank of San Francisco (2010). ["Community Investments: Transit-Oriented Development."](#)

neighborhoods and communities, including assessing localized traffic impacts, as well as how well they utilize existing infrastructure and whether additional transit, highway capacity, and travel demand management actions will be needed.

Other, more spatially-specific approaches include the use of overlay zones and generic environmental assessments to incentivize and identify suitable locations for TOD. These approaches can offer communities significant advantages for pursuing equitable TOD in the context of larger-scale county, RPO, MPO and other regional plans:

Overlay zoning is a regulatory tool that creates a special zoning district, placed over an existing base zone(s), which identifies special provisions in addition to those in the underlying base zone. The overlay district can share common boundaries with the base zone or cut across base zone boundaries. Regulations or incentives are attached to the overlay district to protect a specific resource or guide development within a special area. A community might use incentives along a transit corridor to encourage higher development densities, target uses, or control appearance.¹³

Federal environmental regulations and similar state regulations in New York and Connecticut allow for the preparation of environmental impact assessments for sequences of planned actions, activities, or projects. These types of assessments can offer significant procedural advantages for local municipalities by mitigating the need for separate environmental assessments for individual projects within a TOD area.

As an example, according to Section 617.10 of New York State's *State Environmental Quality Review Act*, generic environmental impacts statements (generic EISs) may be broader, and more general than site or project-specific EISs and should discuss the logic and rationale for the choices advanced. A GEIS may be used to assess the environmental impacts of: (1) a number of separate actions in a given geographic area which, if considered singly, may have minor impacts, but if considered together may have significant impacts; or (2) a sequence of actions, contemplated by a single agency or individual; or (3) separate actions having generic or common impacts; or (4) an entire program or plan having wide application or restricting the range of future alternative policies or projects, including new

or significant changes to existing land use plans, development plans, zoning regulations or agency comprehensive resource management plans.

IV. JOB ACCESS AND ECONOMIC OPPORTUNITY

HUD CONSOLIDATED PLANNING

As indicated in previous sections, state and local governments which receive funding from HUD are required to submit a Consolidated Plan as a prerequisite for that funding. According to the HUD website:

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the four CPD formula block grant programs: the Community Development Block Grant (CDBG), the HOME Investment Partnership (HOME), the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with AIDS (HOPWA) program.

As described in 24 CFR Part 91:

Overall goals. (1) The overall goal of the community planning and development programs covered by this part is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons. The primary means towards this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing.

A key goal in 24 CFR Part 91 as it relates to Job Access and Economic Opportunity is as follows:

(iii) Expanded economic opportunities includes job creation and retention; establishment, stabilization and expansion of small businesses (including microbusinesses); the provision of

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public services concerned with employment; the provision of jobs involved in carrying out activities under programs covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities for low-income persons to reduce generational poverty in federally assisted and public housing.

Thus, the Consolidated Plan is a critical assessment of the jurisdictions receiving funding and it lays out the strategies and policies of these jurisdictions for housing, growth, and community economic development.

For local municipal jurisdictions which seek and receive funding through HUD, the key requirements for the Consolidated Plan track closely with the local comprehensive plan in New York or the plan of conservation and development in Connecticut. The basic community assumptions for growth and development are contained in these planning documents and can form the basis for the local Consolidated Plan.

Both the State of New York and the State of Connecticut also develop statewide consolidated plans. These statewide plans are developed in consultation with local governments within the state and fulfill requirements for statewide receipt of HUD funding.

FEDERAL TRANSIT ADMINISTRATION (FTA) SECTION 5316 JOB ACCESS AND REVERSE COMMUTE PROGRAM

MPOs wishing to receive funding from the FTA under Section 5316, the Job Access and Reverse Commute Program, must also undertake related planning activities. According to the FTA website:

The Job Access and Reverse Commute (JARC) program was established to address the unique transportation challenges faced by welfare recipients and low-income persons seeking to obtain and maintain employment. Many new entry-level jobs are located in suburban areas, and low-income individuals have difficulty accessing these jobs from their inner city, urban,

or rural neighborhoods. In addition, many entry level-jobs require working late at night or on weekends when conventional transit services are either reduced or non-existent. Finally, many employment related-trips are complex and involve multiple destinations including reaching childcare facilities or other services.

Title 49 U.S.C. 5316, as amended by SAFETEA-LU, requires a recipient of Section 5316 funds to certify that projects selected are derived from a locally developed, coordinated public transit-human services transportation plan.

Further information on the Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan) follows from the FTA website:

Federal Transit Law, as amended by SAFETEA-LU, requires that projects selected for funding under the Elderly Individuals and Individuals with Disabilities (Section 5310), Job Access and Reverse Commute (JARC), and New Freedom programs be derived from a locally developed, coordinated public transit-human services transportation plan and that the plan be developed through a process that includes representatives of public, private, and non-profit transportation and human services providers and participation by members of the public. These plans identify the transportation needs of individuals with disabilities, older adults, and people with low incomes, provide strategies for meeting these needs, and prioritize transportation services for funding and implementation.

Section 5316 JARC funds are available to states and to designated recipients of federal transit funding. According to the FTA, designated recipients are the entities which “receive and apportion” the funding and ultimately assemble the program of projects to be funded. In New York, the New York State Department of Transportation acts as the designated recipient for Section 5316 funding and a program of projects is solicited from eligible public transit and human services transportation providers within the MPO’s planning area. Funding is allocated through that solicitation on a competitive basis. A similar arrangement exists in the State of Connecticut through the Connecticut Department of Transportation.

In terms of the development of the Coordinated Plan, the processes differ in the two states. In New

York, the Coordinated Plan is developed regionally by the MPO. In Connecticut, a “locally coordinated” statewide Coordinated Plan is developed by the Connecticut Department of Transportation in consultation with the MPOs in the state.

The current federal transportation authorization act is titled *Moving Ahead for Progress in the 21st Century* (MAP-21). Significant changes in MAP-21 include the end of both JARC and New Freedom as distinct programs. Both survive as eligible activities. JARC-type projects will be eligible activities under the rural (Section 5311) and urban (Section 5307) funding provisions. JARC activities are given a new definition in MAP-21: “Job access and reverse commute project” means a transportation project to finance planning, capital, and operating costs that support the development and maintenance of transportation services designed to transport welfare recipients and eligible low-income individuals to and from jobs and activities related to their employment, including transportation projects that facilitate the provision of public transportation services from urbanized areas and rural areas to suburban employment locations.¹⁴

The impact of these programmatic changes on the planning requirements for job access will be better understood once new federal rulemaking becomes available in 2014.



Figure xiv. CT Transit Buses in Stamford, CT

OTHER AREAS OF JOB ACCESS PLANNING

Although not associated with a specific funding program, some elements of planning for job

access may also be undertaken by local municipalities in their comprehensive plans or POCDs, counties in their master plans or vision plans in New York, RPOs in their regional POCDs in Connecticut, and public transit and human services transportation providers in their normal service planning processes. Job access planning in these other areas is not a formal requirement and therefore is not usually undertaken in a comprehensive approach. Rather it is undertaken in response to specific circumstances that surface either within the overall planning process or in response to changes in local conditions.

Job access planning also has a relationship to the economic development plans that are produced by Regional Economic Development Councils in New York and by RPOs and independent organizations, and statewide in Connecticut. Although these plans may not contain a specific transportation component, the economic development strategies and projects that they define are relevant to both job access and reverse commute transportation planning.

POSSIBLE APPROACHES TO PLANNING INTEGRATION

More effective job access planning for communities will require a greater synthesis of economic development and transportation planning at multiple levels. At a minimum, coordinated job access components should be included in local municipal and county (or regional planning organization) comprehensive plans (and plans of conservation and development) as well as MPO regional transportation plans. Better integration of economic development planning at local, regional, and statewide levels would also enhance planning for both job access and for community economic development.

V. REGIONAL STRATEGIES FOR ENERGY EFFICIENCY

A number of initiatives are underway at the federal level and in New York and Connecticut to reduce energy use and corresponding Green House Gas (GHG) emissions. However, additional steps are needed to make the current approach more comprehensive and to increase overall impact.

ENERGY PLANNING IN NEW YORK STATE

NEW YORK STATE'S DRAFT 2014 ENERGY PLAN:

The draft 2014 New York State Energy Plan sets forth a vision for New York's energy future that connects the private sector market with communities and individual customers to create a dynamic, clean energy economy. Renewable power sources—hydro, solar, wind, and other carbon-free solutions—continue to grow as a share of the total energy produced in New York State. As outlined in statute, the Energy Plan will focus on reliably meeting projected future energy demands, while balancing economic development, climate change, environmental quality, health, safety and welfare, transportation, and consumer energy cost objectives.¹⁵

The Plan includes efforts to cross reference capital transportation projects with community generated land use and smart growth plans and also mentions efforts to stimulate market demand in electric and energy efficient vehicles through outreach and education. It indicates the critical importance of diversifying the fuel mix of the transportation sector as, at the moment, 98% of the sector's primary fuel expenditure is petroleum. Furthermore, the Plan acknowledges that the State will need to continue to invest in public transportation options and to develop alternative fuel options and electric vehicle infrastructure.

SUSTAINABLE COMMUNITIES PLANNING:

New York State has dedicated \$100 million in proceeds from the Regional Greenhouse Gas Initiative for the Cleaner, Greener Communities Program, which supports smart growth and sustainability planning and projects. Cleaner, Greener empowers regions to create more sustainable communities by funding smart growth practices based on comprehensive regional sustainability plans developed to guide integrated, sustainable solutions—from statewide investments to regional decision-making on land use, housing, transportation, infrastructure, energy and environmental practices. The regional sustainability plans identify strategies and implementation steps. In the next stage of this process, New York State will provide \$30 million annually for implementation of projects selected from the plans that address sustainability, resiliency and greenhouse gas reductions.

CLIMATE SMART COMMUNITIES:

New York State's energy reduction efforts includes outreach to municipal governments. Climate Smart Communities is a state-local partnership to meet the economic, social, and environmental challenges that climate change poses for New York's local governments. To help local governments reduce greenhouse gas emissions and increase community resiliency to climate change, the program provides community coordinators, a listserv, webinars, and a local action guide. Climate Smart coordinators are empowering local governments by connecting them with appropriate financial and technical programs, helping them to coordinate with and learn from other communities, offering practical assistance and helping communities to track and report successes and barriers.

COMPREHENSIVE ENERGY PILOTS:

The New York State Energy Research and Development Authority is sponsoring comprehensive energy planning pilots throughout the state. One of those pilots, in the City of Yonkers, recently developed a plan that identifies municipal projects that will reduce greenhouse gas emissions by reducing demand for energy. The first major project, which is underway citywide, involves changing municipal lighting, including streetlights, to Light-Emitting Diode (LED) fixtures.

PLANYC

In addition to New York State's planning efforts, New York City has moved forward to implement its own plan to reduce energy and greenhouse gas emissions through its long-range sustainability plan, known as PlaNYC. A key goal of PlaNYC in this regard is to promote new housing near transit, which the Bronx and East New York place-based projects undertaken through the Consortium's planning program will help accomplish.

New York City has successfully implemented a number of energy-saving measures that put it on track to achieve a 20 percent greenhouse gas reduction by 2020. Most recently, the development of bike share has captured the imagination of the traveling public. Other strategies include the conversion of the truck transport of solid waste to barge and rail, new regulations on high polluting building heating oil and a Green Codes Task Force that has worked to revise construction codes, an

¹⁵ New York State Energy Plan website

effort that is projected to reduce construction-related greenhouse gas emissions by 5 percent by 2030.

GREENR THE NEW ROCHELLE SUSTAINABILITY PLAN:

In 2010 New Rochelle presented GreenNR, its first sustainability plan. GreenNR reflects and articulates a vision of sustainable practice that can enhance the quality of life citizens today, without compromising the interests of future generations. GreenNR aligns New Rochelle with other municipalities in their quest to address climate change, resource depletion and social progress. GreenNR addresses specific achievable, short term and long term goals and recommendations which aim to improve the economic, social and environmental health of New Rochelle. GreenNR outlines six areas; 1) Energy & Climate, 2) Resource Conservation & Waste Reduction, 3) Ecology, Biodiversity & Public Health, 4) Smart Growth & Economic Prosperity, 5) Transportation & Mobility and 6) Public Participation & Awareness, with 43 sustainable initiatives and a 20-year plan.

RECENT NEW YORK STATE ENERGY EFFICIENCY EFFORTS:

New York State is currently pursuing a series of clean energy initiatives to reduce energy consumption and reduce the State's carbon footprint. The most important initiatives are highlighted below:

New York Green Bank:

In his 2013 State of the State address, the Governor announced the creation of a \$1 billion New York Green Bank to mobilize private sector capital to finance the transition to a more cost-effective, resilient and clean energy system. The Green Bank will accelerate the deployment of clean energy through a variety of financing tools targeted at harnessing capital markets and alleviating financial market barriers. The bank has an initial capitalization totaling \$210 million.

Renewable Energy Investments and Efforts:

The NY-Sun program aims to significantly increase the amount of solar capacity in the State. Since its launch, a total of 299 megawatts of solar photovoltaic capacity has been installed or is under development, more than was installed in the entire prior decade.

Also under NY-Sun, a New York State Unified Solar Permit was developed that will reduce costs for solar projects by streamlining municipal permitting processes.

Improving Energy Efficiency in State-Owned Buildings and Private Residences:

In 2013, the Governor issued an executive order with the goal of improving energy efficiency in State-owned buildings by 20% by 2020, under the auspices of the Build Smart NY initiative. This initiative is currently benchmarking the energy usage of State-owned buildings and executing energy master plans for facilities where the most energy is used. The New York Power Authority, which is administering Build Smart NY, is providing \$30 million over five years to advance market development and commercialization of new energy efficiency technologies. To stimulate residential energy efficiency projects, the State also raised \$24.3 million in its first-ever issuance of revenue bonds to finance loans for consumers. This bond issuance was an innovative financing collaboration between the New York State Energy Research and Development Authority and the New York Environmental Facilities Corporation that addressed a market barrier found within the clean energy sector.

Charge NY Electric Vehicle Initiative:

In 2013, the Governor announced the Charge NY Initiative to install 3,000 public charging stations for electric vehicles (EV) statewide over the next five years. Through this program, \$50 million will be invested to stimulate demand for EVs and investments in infrastructure. Under the Charge NY initiative, a tax credit is provided for electric vehicle charging infrastructure. In addition, the Governor announced a \$19 million incentive program to encourage the purchase of battery-electric commercial trucks. New York also joined seven other Northeastern states in a memorandum of understanding to put more than three million electric-drive vehicles on the road in their states within a dozen years.

ENERGY PLANNING IN THE STATE OF CONNECTICUT

COMPREHENSIVE ENERGY STRATEGY:

Connecticut's Energy Strategy offers a set of

recommendations to move the state to a cheaper, cleaner, and more reliable energy future. It advances a flexible finance model that encourages private sector leadership in scaling up energy reduction projects using limited government funds as leverage. The Strategy notes the following:

At the heart of the Strategy are a series of policy proposals aimed at expanding energy choices, lowering utility bills for Connecticut residents and businesses, improving environmental conditions, creating clean energy jobs, and enhancing the quality of life in the state. The Strategy offers recommendations in five major priority areas: Energy efficiency; Industrial energy needs; Electricity supply including renewable power; Natural gas; and Transportation.

There are many approaches detailed in the Strategy across a number of sectors that will decrease energy use as they are implemented. Of special relevance is the transportation component which calls for expanded commitment to transit-oriented development and a broader mobility focus that encourages development of bikeways and walking paths. Also, noteworthy is the inclusion of electric vehicle charging stations to be placed strategically throughout the state, and the support of conversion of fleets to use natural gas in conjunction with private sector-funded constructions of natural gas filling stations.

Another approach is evident in the Natural Gas sector. As of now only 31 percent of Connecticut homes are heated with natural gas. The majority of the remainder heat with diesel oil or electricity. The percentage of commercial and industrial entities with access to gas is only slightly higher. The Strategy proposes to make natural gas available to 300,000 additional customers, beginning with the roughly 217,000 customers who are on gas mains but not heating with gas. The Strategy offers financing for the cost of converting furnaces and boilers to natural gas – with the average residential cost of about \$7,500 being paid back over a decade through an on-bill repayment system collected by the gas companies (but funded by banks) providing the average household with an immediate cost savings of around \$800 per year. Similar fiscal arrangements are in place to add roughly 900 miles of gas mains to serve large facilities and residential customers.

BGREEN 2020:

On the local level, the City of Bridgeport has developed a comprehensive community-wide sustainability plan, BGreen 2020, in partnership with local business and civic organizations. It is similar in the breadth of its scope to PlaNYC. The intent of BGreen 2020 is to transform Bridgeport into a sustainable city. It contains specific reductions targets and recommended ways to achieve them that are unique to Bridgeport.

BGreen 2020 calls for major zoning changes in downtown Bridgeport to allow mixed-use and develop its neighborhoods as walk able, transit oriented developments environments for living and working. At the same time brownfields were cleaned up and found new uses. As a result, downtown Bridgeport has added dozens of new housing units, restaurants, and shops in the past few years, with hundreds more apartments in the planning phase.

Bridgeport's street grid of small blocks allows many trips to be made by walking and transit. Bridgeport's Complete Streets policy will ensure that Bridgeport's streets will be upgraded to meet sustainable standards creating a safe environment for pedestrians and bicyclists. The policy will also coordinate street renovations with economic development activity. As a component of the Consortium's Sustainable Communities work program, the City has also assessed the feasibility of a new train station on its east side to provide momentum for the transit-oriented redevelopment of adjacent post-industrial development sites.

Also notable is the Solarize program, which provides residential solar photo voltaic panels at an aggregated rate as part of a joint venture. So far 15 installations have been made and additional sites have been identified.

FEDERAL RESOURCES FOR ENERGY EFFICIENCY

GREEN REFINANCE PLUS

Green Refinance Plus is an enhancement of the Fannie Mae/FHA Risk-Share program, which provides funding for the refinance, preservation and energy-efficient retrofits of older affordable multifamily housing properties. This program allows for higher loan amounts than traditionally available to cover a property's standard purchase costs as well as

investments improving energy efficiency.

FHA POWERSAVER

FHA PowerSaver is a new mortgage insurance from the Federal Housing Administration (FHA) that enables homeowners to make cost-effective, energy-saving improvements to their homes. PowerSaver enables homeowners to borrow up to \$25,000 to make eligible energy improvements such as insulation, duct sealing, energy efficient doors and windows, energy efficient HVAC systems and water heaters, solar panels and geothermal systems. The program is currently run as a pilot through selected participating lenders.

A resource for additional federal programs that can support energy efficiency investments in homes, workplaces, government facilities, and other applications is the 2013 document *Federal Finance Facilities Available for Energy Efficiency Upgrades and Clean Energy Deployment: A Guide for State, Local & Tribal Leaders and their Partners*, which provides a comprehensive inventory of programs where energy efficiency is one of many qualifying purposes.

POSSIBLE APPROACHES TO PLANNING INTEGRATION

A vital first step in the enhancement of energy could be the coordination, formally or informally, of the New York State Energy Plan and the Connecticut Comprehensive Energy Strategy. This step would be important due to the fact that each state has its own energy use patterns and sources of energy supply. Also, the strategies of each state will likely reinforce one another when considered in a bi-state context.

Once there is a cross-accepted planning framework, counties and RPOs, and/or local municipalities may then develop energy reduction plans or include energy reduction components in their comprehensive plans, sustainability plans or POCDs that include specific strategies that are developed with the participation of their communities. A regional planning framework should also be integrated with MPO transportation plans, HUD consolidated plans and economic development plans at various levels to maximize its effectiveness.

VI. RESILIENCY AND HAZARD MITIGATION

HAZARD MITIGATION PLANNING

State, tribal, and local governments are required to develop a hazard mitigation plan as a condition for receiving certain types of non-emergency disaster assistance, including funding for mitigation projects. The [Robert T. Stafford Disaster Relief and Emergency Assistance Act](#) (Public Law 93-288), as amended by the Disaster Mitigation Act of 2000, provides the legal basis for State, local, and Tribal governments to undertake a risk-based approach to reducing risks from natural hazards through mitigation planning¹⁶.

According to the Stafford Act:

The President is authorized to establish a program of disaster preparedness that utilizes services of all appropriate agencies and includes -

- (1) preparation of disaster preparedness plans for mitigation, warning, emergency operations, rehabilitation, and recovery;*
- (2) training and exercises;*
- (3) post disaster critiques and evaluations;*
- (4) annual review of programs;*
- (5) coordination of Federal, State, and local preparedness programs;*
- (6) application of science and technology;*
- (7) research.*

Specifically, 42 U.S.C. 5133 states:

If the President determines that a State or local government has identified natural disaster hazards in areas under its jurisdiction and has demonstrated the ability to form effective public-private natural disaster hazard mitigation partnerships, the President, using amounts in the National Pre-disaster Mitigation Fund established under subsection (i) of this section may provide technical and financial assistance to the State or local government.

The requirements and procedures for State, Tribal and Local Mitigation Plans are found in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201 ([44 CFR Part 201](#)). Several key excerpts follow:

- States must have an approved Standard State

¹⁶ FEMA website; Mitigation Planning Laws, Regulations, & Guidance

Mitigation Plans meeting the requirements of this section as a condition of receiving non-emergency Stafford Act assistance and FEMA mitigation grants. Emergency assistance provided under 42 U.S.C. 5170a, 5170b, 5173, 5174, 5177, 5179, 5180, 5182, 5183, 5184, 5192 will not be affected. Mitigation planning grants provided through the Pre-disaster Mitigation (PDM) program, authorized under section 203 of the Stafford Act, 42 U.S.C. 5133, will also continue to be available. The mitigation plan is the demonstration of the State's commitment to reduce risks from natural hazards and serves as a guide for State decision makers as they commit resources to reducing the effects of natural hazards.

- A State with a FEMA approved Enhanced State Mitigation Plan at the time of a disaster declaration is eligible to receive increased funds under the HMGP, based on twenty percent of the total estimated eligible Stafford Act disaster assistance. The Enhanced State Mitigation Plan must demonstrate that a State has developed a comprehensive mitigation program, that the State effectively uses available mitigation funding, and that it is capable of managing the increased funding. In order for the State to be eligible for the 20 percent HMGP funding, FEMA must have approved the plan within three years prior to the disaster declaration.
- A local government must have a mitigation plan approved pursuant to this section in order to receive HMGP project grants. The Administrator may, at his discretion, require a local mitigation plan for the Repetitive Flood Claims Program. A local government must have a mitigation plan approved pursuant to this section in order to apply for and receive mitigation project grants under all other mitigation grant programs.
- *Multi-jurisdictional plans (e.g. watershed plans) may be accepted, as appropriate, as long as each jurisdiction has participated in the process and has officially adopted the plan. State-wide plans will not be accepted as multi-jurisdictional plans.*
- *Indian tribal governments applying to FEMA as a grantee must have an approved Tribal Mitigation Plan meeting the requirements of this section as a condition of receiving non-emergency Stafford Act assistance and FEMA mitigation grants.*

Emergency assistance provided under 42 U.S.C. 5170a, 5170b, 5173, 5174, 5177, 5179, 5180, 5182, 5183, 5184, 5192 will not be affected. Mitigation planning grants provided through the PDM program, authorized under section 203 of the Stafford Act, 42 U.S.C. 5133, will also continue to be available.

According to the FEMA website, plans at all of these levels must contain risk assessments and mitigation strategies. Risk assessments must characterize and analyze natural hazards and risks. Mitigation strategies provide a blueprint for reducing the losses identified in the risk assessment.

Both New York and Connecticut have adopted statewide plans. In Connecticut, multi-jurisdictional plans have been developed through the regional planning organizations, while local municipal plans have also been developed. In New York, counties have adopted multi-jurisdictional plans in addition to the local municipal plan.

RESILIENCY PLANNING

Resiliency planning is also undertaken throughout the New York-Connecticut planning area and has taken on greater significance in light of the potential impacts of climate change and – most significantly – in the aftermath of Hurricane Sandy in October 2012. The City of New York issued *A Stronger, More Resilient New York* in June 2013 through its Special Initiative for Rebuilding and Resiliency. This resiliency plan is described as a comprehensive plan that contains actionable recommendations both for rebuilding the communities impacted by Sandy and increasing the resilience of infrastructure and buildings citywide¹⁷. The New York State Department of State sponsors a Coastal Resilience Planning Process for coastal communities in New York State and the New York Rising Community Reconstruction Program has been established to provide additional rebuilding and revitalization assistance to communities severely damaged by Hurricanes Sandy and Irene and Tropical Storm Lee. Similarly, in Connecticut, coastal communities have undertaken resiliency planning, while the state released a comprehensive resiliency plan in 2011, *Connecticut Climate Change Preparedness Plan* and has established a Shoreline Preservation Task Force.

Additionally, New York State's 2100 Commission is
¹⁷ NYC Special Initiative for Rebuilding and Resiliency website

tasked with finding ways to improve resilience in the face of natural disasters and other emergencies. 18 In January 2013, the Commission released a preliminary report on improving the strength and resiliency of New York State's infrastructure. The Commission's report includes short- and long-term recommendations in the areas of energy, transportation, land use, insurance, and infrastructure financing, as well as cross-cutting recommendations that are common to these sectors.

Apart from the FEMA hazard mitigation requirements described above, other federal programs have also influenced resiliency planning in the New York-Connecticut planning area. Resiliency planning is an element of the U.S. Department of Housing and Urban Development's (HUD) various sustainable communities initiatives. HUD funding was employed in the development of New York City's resiliency plan. Further, HUD held a regional design competition. According to the HUD website:



Figure xv. Storm-related flooding in Bridgeport, CT

REBUILD BY DESIGN

Rebuild By Design is a multi-stage regional design competition. The goal of the competition is to attract world-class talent, promote innovation and develop projects that will actually be built. Once the best ideas are identified, HUD will incentivize their implementation using funds made available through the Community Development Block Grant Disaster Recovery (CDBG-DR) program as well as other public and private funds.

Additionally, the Federal Highway Administration (FHWA) is partnering with State Departments of

Transportation (DOTs), Metropolitan Planning Organizations (MPOs), and Federal Land Management Agencies (FLMAs) to pilot approaches to conduct climate change and extreme weather vulnerability assessments of transportation infrastructure and to analyze options for adapting and improving resiliency¹⁹. In the New York-Connecticut planning area, FHWA is funding a study - the *New York – New Jersey – Connecticut Hurricane Sandy Follow-up and Transportation Vulnerability Assessment and Adaptation Analysis*- that will look at post storm vulnerability and adaption for transportation assets. Planning Enhancements

POSSIBLE APPROACHES TO PLANNING INTEGRATION

More effective resiliency planning will require a greater integration of hazard mitigation and resiliency plans with all other identified plans at multiple levels. At a minimum, coordinated hazard mitigation and resiliency components should be included in HUD consolidated plans at all levels, local and county/RPO comprehensive and master plans and plans of conservation and development, as well as MPO regional transportation plans. Better integration with economic development planning at local, regional and statewide levels is also crucial to effective resiliency planning. Specifically, economic development plans should draw on hazard mitigation and resiliency plans as a necessary template for their planning areas. Hazard mitigation and resiliency plans should also consider and incorporate regional goals for economic development and conservation goals established in plans of conservation and development and related plans.

18 New York State 2100 Commission website

19 FHWA website; Climate Change Resilience Pilots

b. Fair Housing and Equity Assessment

I. THE FAIR HOUSING AND EQUITY ASSESSMENT (FHEA): WHAT IT IS AND WHY IT MATTERS

The rationale for making fair housing analysis an integral part of regional sustainability planning is rooted in long-standing federal housing statutes as well as an inclusive definition of sustainability. The Civil Rights Act of 1968 as amended in subsequent years prohibits housing discrimination based on race, national origin, color, religion, gender, family status and disability. It also requires all federal agencies and effectively recipients of federal funding to affirmatively further fair housing in their jurisdictions. Concepts of sustainability have also evolved to acknowledge that supporting sustainable patterns of human development requires creating communities where everyone has healthy, safe living conditions and access to the services and opportunities that allow individuals to reach their full potential.

The federal Partnership for Sustainable Communities has linked these goals in their guidance for developing regional sustainability plans, specifying that sustainability includes creating “geographies of opportunity,” places that effectively connect people to jobs, quality public schools and other amenities. This commitment by the federal Partnership is their recognition that policies at every level of government have contributed to segregation patterns and that coordinated, affirmative actions are needed to overcome that legacy.²⁰ Regional collaborations, including the New York-Connecticut Sustainable Communities initiative, provide an opportunity to link housing, transportation, economic development, and environmental planning in new ways to meet this objective.

The Fair Housing and Equity Assessment (FHEA) examines the shape of segregation in the New York-Connecticut region, with a particular emphasis on how disparate housing options create or reinforce regional inequities. The FHEA is a required element of all Sustainable Communities Regional Planning

grants, and a central component of the planning program of the New York-Connecticut Sustainable Communities Consortium. Its objectives are to understand the context, data, and evidence for equity and opportunity in the region, engage regional stakeholders in the findings and implications of the analysis, and include recommended strategies to inform the consortium’s planning process as well as decision-making in the region.

BENEFITS OF RACIAL AND ETHNIC INTEGRATION

In spite of decades of social and demographic change, racial and ethnic segregation remains a defining characteristic of metropolitan America, including the New York-Connecticut region. The region’s cities are among the most diverse in the United States, and its suburbs have rapidly growing African-American, Hispanic, and Asian populations. But at a neighborhood level, people of different races and ethnicities are concentrated in distinct areas, have disparate housing choices, attend different schools, and have access to different types of jobs and services. This affects not only individual outcomes, but the success of the region in a global economy that values diversity, choice, education, and access to a skilled workforce.

Overcoming persistent patterns of segregation is essential to values of fairness and regional equity that are embodied in both law and the goals of numerous local and regional plans. But creating more integrated communities has benefits that extend beyond these objectives. A growing body of evidence points to the value of integration for the prosperity of the region across racial, ethnic and income lines.

STRONGER ECONOMIC GROWTH:

A recent study examining patterns of economic growth in U.S. metropolitan regions from 1980-2005 found that regions that were more segregated by both race and skill levels had weaker economic growth in both the short- and long-term.²¹ By implication, regions with more integrated housing and labor markets have a competitive advantage, presumably because these places do a better job of both developing their human capital and giving

20 “Regional Fair Housing Equity Assessment,” U.S. Department of Housing & Urban Development guidance webinar to Sustainable Communities grantees, February 22, 2012, slide 7.

21 Li, Huanping, Campbell, & Fernandez, “Residential Segregation, Spatial Mismatch, and Economic Growth across US Metropolitan Areas,” *Urban Studies*, October 2013, vol. 50, no. 3.

employers access to a larger pool of workers with a diverse range of skills.

GREATER ECONOMIC OPPORTUNITY:

The ability to climb the economic ladder, from poverty to the middle class and from modest income to affluence, is an enduring American value that has attracted successive waves of immigrants. A highly publicized study by researchers at the Equality of Opportunity Project found wide variability among metropolitan regions for children born to low-income parents, with some regions having rates of upward mobility that are comparable to nations like Denmark, noted for high rates of mobility, while others have rates that are lower than for any developed nation for which data is available. The study found a complex array of regional characteristics associated with high rates of income mobility, such as the quality of K-12 education and social and family characteristics such as the number of religious individuals and single-parent families. Among these factors, segregation by both race and income were found to be negatively correlated with upward mobility. It also found that these results mattered for individuals regardless of race. Both whites and non-whites had poorer chances of escaping poverty and climbing the economic ladder in regions that were more highly segregated.²²

BETTER EDUCATION OUTCOMES:

A large part of the improved economic performance of more integrated regions is likely the result of the impact of school diversity on education outcomes. As documented in a research brief for the National Coalition on School Diversity, a large volume of research since the 1980s has documented clear and consistent findings: “Whether a school is racially and socioeconomically (SES) diverse or segregated makes a critical difference for K-12 achievement across the curriculum: Students who attend racially and socioeconomically diverse schools are more likely to achieve higher test scores and better grades, to graduate from high school, and to attend and graduate from college compared with their otherwise comparable counterparts who attend schools with high concentrations of low income and/or

disadvantaged minority youth.”²³

Like the findings of the Equality of Opportunity Project, these studies show that students from all racial and socioeconomic backgrounds, not just disadvantaged minorities, benefit from integrated schools.

MORE EFFICIENT HOUSING MARKETS, TRANSPORTATION AND LAND USE:

Metropolitan economies exist because they organize jobs, housing, infrastructure and other resources in ways that facilitate the efficient flow of people, goods and information. A well-functioning region will maximize the housing and employment choices available to residents, as well as the location and labor choices for businesses. Housing discrimination can distort these advantages, limiting choice for both residents and businesses, creating cycles of disinvestment in large parts of the region, driving down housing prices in some neighborhoods and artificially raising the cost of housing in others. By spreading housing and labor markets, they can also put additional demands on transportation and other infrastructure, raising investment and operation costs. There is little doubt that discrimination suppresses housing values and new housing development in African-American and Hispanic neighborhoods, while efforts to limit housing supply in largely white neighborhoods drive up the cost of housing.²⁴

Infused throughout these specific economic and equity benefits is the powerful but difficult to quantify value of social cohesion. Racially and economically integrated neighborhoods can develop cultural fluency, tolerance and trust—important attributes in and of themselves and for developing political consensus across community and jurisdictional boundaries.

The New York metropolitan area shares the dynamics and consequences of racial segregation with other U.S. regions, but has its own distinct history, challenges, and opportunities. The Fair Housing

²³ Michaelson, Roselyn Arlin, School Integration and K-12 Education Outcomes: A Quick Synthesis of Social Science Evidence, The National Coalition on School Diversity, Brief No. 5, October 2011.

²⁴ Green, Richard K., The Nine Causes of Sprawl, Working Paper #541, Samuel Zell and Robert Lurie Real Estate Institute, The Wharton School, University of Pennsylvania, July 1999; Cowan, Spencer and Katie Buitrago, Struggling to Stay Afloat: Negative Equity in Communities of Color in the Chicago Six County Region, Woodstock Institute, (2012).

²² Raj Chetty, Nathaniel Hendren, Patrick Kline, Emmanuel Saez, The Economic Impact of Tax Expenditures: Evidence from Spatial Variation Across the U.S., The Equality of Opportunity Project, July 2013, Summary of Project Findings.

and Equity Assessment is an attempt to understand and address the particular ways that these issues manifest themselves within the boundaries of the New York-Connecticut consortium’s planning area, using the guidelines provided by the U.S. Department of Housing and Urban Development.

II. PURPOSE AND APPROACH

Guidance from the Department of Housing and Urban Development (HUD) specifies elements that need to be included in the FHEA, but provides grantees with considerable latitude in how to meet these requirements. At the broadest level, the FHEA is intended to achieve three objectives that facilitate regional collaboration:

- Understand the historical, current and future context for equity and opportunity in the region and the data and evidence that demonstrates those dynamics,
- Engage regional leaders and stakeholders on findings and implications of analysis, and
- Integrate knowledge developed through the regional FHEA exercise into priority-setting and decision making.

The assessment needs to address conditions, causes and implications of several specific issues related to fair housing and regional equity:

1. Segregated Areas and Areas of Increasing Diversity and/or Racial/Ethnic Integration
2. Racially/Ethnically Concentrated Areas of Poverty
3. Access to Existing Areas of High Opportunity
4. Major Public Investments
5. Fair Housing Issues, Services, and Activities

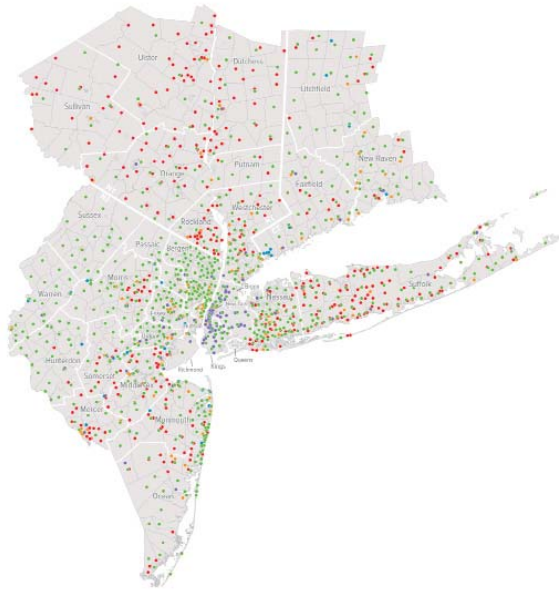
Grantees were asked to focus their analysis at a regional scale across these components, comparing within and across jurisdictions to gain a full picture of regional equity and access to opportunity. The FHEA also needs to document conclusions from the stakeholder engagement process, including deliberation by the consortium and with other

regional leaders and stakeholders, as well as how those findings will inform the regional planning effort and decisions that flow from it.

Applying these guidelines meant devising an approach that fit the particular challenges of the New York-Connecticut region. One fundamental challenge is the size and complexity of the region, an issue that impacts all three FHEA objectives—analysis, engagement and decision-making. As shown in the map below, the planning area of the New York-Connecticut region is part of the larger tri-state metropolitan area, which encompasses parts of three states with 783 municipalities and 22 million people in a 13,000 square mile area. The New York-Connecticut planning area has two-thirds of the population of the metropolitan region and includes its central city, all or parts of 12 counties, and four of the metropolitan area’s 10 metropolitan planning organizations (MPOs).

It was not feasible to conduct an analysis at the level of individual jurisdictions or neighborhoods with a region of this scale. The larger regional dynamics also needed to consider conditions and trends for the larger tri-state region, since housing and employment markets and opportunities are influenced by availability of housing and jobs in New Jersey, the mid-Hudson Valley, and elsewhere in Connecticut. Much of the data provided to grantees by HUD also proved difficult to apply in this region and needed to be revised and supplemented. For similar reasons, the stakeholder engagement process was not able to incorporate neighborhood-level input throughout the region. Strategy development also needed to account for different regulatory contexts in different parts of the region, particularly differences between New York and Connecticut.

The FHEA also needed to take account of the region’s existing institutional structure and organizational capacities for addressing fair housing and regional equity. On the one hand, the region has a long history of analyzing and debating fair housing and community development issues, and several nationally- and locally-renowned organizations implementing programs to address them. However, most dialogue and collaboration on these issues have taken place at the state, county, or sub-regional level. The amount of dialogue among governmental entities, fair housing advocates, community development organizations, private developers, and community advocates has also varied widely across the region.



- 1 Region
 - 3 States
 - 17 MPOs
 - 31 Counties
 - 783 Municipalities
 - 703 School Districts
 - 175 Housing Authorities
 - 459 Fire Districts
 - 36 Sewer Districts*
- *Data not available for NYS.
- 157 Business Improvement Districts

Figure xvi. Jurisdictions in the New York-New Jersey-Connecticut Metropolitan Area and New York Connecticut Consortium Study Area

Source: Data compiled by Regional Plan Association from Connecticut General Assembly 2011, New Jersey State Department of Community Affairs 2012, NYC Planning Department 2012, Nassau County Planning Department 2012, Suffolk County Planning Department 2012, Dutchess County Government 2013, individual BID websites.

Discussions among members of the Consortium and its Advisory Board and HUD resulted in an approach that attempts to identify actions that can be taken in the near term as well as create a foundation for continued dialogue and collaboration. This approach combines three components to adapt FHEA guidelines to the region’s context.

Most importantly, a FHEA Advisory Committee

was formed to provide the Consortium with recommendations regarding the data analysis, findings, and strategy components of the FHEA, ensuring that the assessment includes the knowledge and perspective of a broad range of community members, experts, and practitioners engaged in fair housing, community development, and related activities. The committee is also intended to help connect the FHEA to related efforts throughout the region, and ensure the utility of the final product to both governmental and non-governmental processes underway to improve regional equity and access to affordable housing and economic opportunity.

Members of the FHEA Advisory Committee include fair housing practitioners, community development practitioners, housing developers, organizations that represent low-income communities and communities of color, state housing agencies and community foundations. The committee includes at least one representative for each of these constituencies from the primary subregions in the New York-Connecticut region—New York City, southwestern Connecticut, Long Island and the Hudson Valley. The Advisory Committee’s members and recommendations to the Consortium can be found in Appendix B.

The FHEA also analyzes the context for equity and opportunity at three different geographic scales. The FHEA findings, summarized below and described in detail in Appendix A, analyzes broad economic, housing and demographic trends for the tri-state metropolitan region to provide a fuller understanding of issues in the region. It then describes housing, opportunity, investment and fair housing services specifically in New York-Connecticut planning area. Where appropriate, analysis is also conducted on a sub-regional basis for New York City, southwestern Connecticut, Long Island and the Hudson Valley.

Finally, a set of neighborhood typologies defined by race and poverty was constructed to analyze the distribution of affordable housing and opportunity indicators, and to help target appropriate strategies for different types of communities. This allowed the Consortium and the Advisory Committee to identify different strategies that are needed to improve conditions in racially-concentrated, high-poverty areas. expand housing options in high-opportunity areas, and address the particular needs of neighborhoods undergoing or vulnerable to the negative impacts of rapid economic or demographic change.

III. SUMMARY OF FINDINGS

Detailed findings from the Fair Housing and Equity Assessment can be found in Appendix A. The five sections of the findings address each of the prescribed elements of the FHEA. The major findings of each of these sections are summarized below.

ECONOMIC, DEMOGRAPHIC AND HOUSING TRENDS

- The existing settlement patterns in the region were set by late 19th century immigration and the great migration from the South in the early 20th century, and continuing with post-World War II suburbanization. Patterns of segregation were established early in the last century. The migration of white residents from New York City to Long Island, the Hudson Valley, New Jersey and Connecticut added the dimension of suburban sprawl to regional patterns of segregation, a development that was aided by both federal and local policies.
- Beginning in the early 1990s, the convergence of several trends created new dynamics that create both challenges and opportunities for addressing persistent housing segregation and regional inequities. These include an urban revival in New York City and smaller cities such as Stamford and White Plains, and slowing growth in many of the region's suburbs.
- Even though the region added over 1.5 million jobs and considerable wealth since 1990, median household income has declined and poverty has increased.
- Poverty has grown more rapidly in the suburbs, where isolation, fewer rental homes, and more limited transportation choices create different challenges than urban poverty.
- Race and ethnicity have changed rapidly in all parts of the region, with the non-white population more than doubling in many counties and more than tripling in others.
- The share of household income going to pay rent, mortgage payments and other household expenses rose across income levels.

From 1990-2010, the share of households in the region paying more than 35% of their income for housing rose from 27% to 39%. African-Americans, Hispanics and Asians have considerably higher cost burdens than whites.

- New housing construction has shifted markedly to New York City, especially from suburbs east of the Hudson River in New York and Connecticut. There has also been a shift from single-family to multi-family construction, with most occurring in cities.
- There is no region-wide assessment of future housing needs, but several studies establish a significant gap between the amount and type of housing that the region is producing and the need for housing that is affordable across a broad range of incomes.

PATTERNS OF SEGREGATION AND INTEGRATION

- From 1990-2010, the white share of the region's population declined sharply from 59% to 44%, the result primarily of strong immigration and white outmigration. The biggest changes occurred outside of New York City, although most of the region's non-white population continues to live in the region's cities.
- By one measure, the Dissimilarity Index, the NY-CT region has a high level of segregation for whites and non-whites as a whole. It has a very high level of segregations for African-Americans and whites and for Native Americans and whites, a lower but still high level of segregation between Hispanics and whites, and a moderate level of segregation for Asians and whites.
- Over the last 30 years, dissimilarity indexes have declined moderately in the region, but the New York-New Jersey region remains one of the most highly segregated metropolitan areas in the United States.
- A second metric of segregation predicts what the racial composition of villages, towns and cities would be based on their incomes and the income distribution by race for the metropolitan area as a whole. It indicates that the non-white population is overrepresented in the Bronx, Queens and a few places in western Long Island, the Hudson

Valley and Connecticut, while in most suburban areas non-white residents are underrepresented and whites are overrepresented.

- These segregation patterns are perpetuated by historical causes and by new conditions that trace, and in some cases, worsen the historical inequities. The factors consistently cited by stakeholders and the 22 Analyses of Impediments conducted by jurisdictions in the region include local zoning and land use restrictions, local opposition to affordable housing, discrimination by landlords and tenants, displacement of low-income residents of color in gentrifying neighborhoods and other causes.

ANALYSIS OF AREAS OF NEED AND OPPORTUNITY

- Using a definition of racially and ethnically concentrated areas of poverty (R/ECAPs) provided by HUD, census tracts with populations over 50% non-white and a poverty rate of more than three times the region's average are highly concentrated in urban areas, primarily in the Bronx, upper Manhattan and central Brooklyn in New York City, and in Yonkers, Stamford, Norwalk, Bridgeport, New Haven and Meriden.
- While 9% of the region's population lives in these communities, 16% of African-Americans and 20% of Hispanics live in them. By contrast, 1% of whites and 4% of Asians live in R/ECAPs. Only about one in four poor residents live in R/ECAPs, as do 20% of the nonwhite population.
- An alternative definition based on the poverty rates in four large sections of the region—Long Island, the Hudson Valley, Coastal Connecticut and New York City—shows a more complex pattern reflecting the historical development and mixes of densities and community types in different parts of the region.
- Nine neighborhood typologies were defined across a continuum of race/ethnicity and poverty. These typologies were used to identify broad patterns in the distribution of population, housing, schools and access to jobs.
- The population distribution across the region

shows a bi-furcated region with the most heavily populated types at the two ends of the race/poverty spectrum. Twenty-seven percent of the region's residents live in white, low poverty neighborhoods, while 22% live in non-white, high poverty neighborhoods.

- A significant number of census tracts showed either an increase or decrease of 10 percentage points of more in its white population share or poverty rate between 2000 and 2010. One-hundred thirty-seven census tracts, 4% of the total, had an increase in white population of at least 10 points. Eleven percent of census tracts saw their poverty rate drop by at least 10 percentage points. While it's impossible to know the reasons for these changes without understanding the characteristics of each community, they do indicate the need for a closer look at the dynamics of neighborhoods where these changes took place.
- As expected, low rent units are more prevalent in high poverty areas, but they are also a higher share in non-white neighborhoods at similar levels of poverty.
- Of the 400,000 units of federally-subsidized housing, publically-owned housing represents 71% of the total. The next largest proportion are units that were constructed with low-income housing tax credits (LIHTC), about 20% of the total.
- Public housing, the large majority of which was built decades ago, is concentrated in non-white, high poverty neighborhoods. 21% of all housing in these neighborhoods is public housing.
- The neighborhood type with the highest share of LIHTC housing is multi-racial, medium poverty, where 6% of all housing units have an LIHTC subsidy. Very little LIHTC housing is built in predominantly white neighborhoods.
- The largest share of households receiving housing choice vouchers are in high poverty neighborhoods. White, High poverty neighborhoods have the highest share at 14%, followed by non-white at 8% and multi-racial at 6%. On its face, this would indicate that vouchers have not resulted in families moving to lower poverty areas. It may indicate that

vouchers have facilitated movement to less racially segregated neighborhoods, or could mean that households already living in white areas receive a higher proportion of vouchers.

- Subsidized units of all types are more heavily concentrated in non-white, high poverty and multi-racial, medium poverty areas than either population or poverty numbers would indicate. White areas have lower shares than one would predict based on population size and poverty rate. Housing vouchers are concentrated in high poverty areas but are more dispersed by race.
- Population, housing opportunities and school quality are sharply divided. The largest shares of the region's population are in white, low poverty neighborhoods and non-white high-poverty neighborhoods. Rent levels and the amount of subsidized housing are imbalanced, even taking into the account the different poverty levels of these communities. School achievement is non-white, high poverty neighborhoods is almost the mirror opposite of white, low poverty neighborhoods when viewed through the lens of school district test scores.

IDENTIFICATION AND ASSESSMENT OF MAJOR PUBLIC INVESTMENTS: NON-HOUSING INVESTMENTS AND THEIR RELATIONSHIP TO FAIR HOUSING AND OPPORTUNITY

- The majority of households located in R/ECAPs in New York City do not have access to a private vehicle. Because the city enjoys the highest level of public transportation service in the region, none of New York City's R/ECAPs are isolated from a transportation standpoint. However, the majority of residents in R/ECAPs commute 45 minutes or longer, compared to a median New York City travel time of 35 minutes.
- The majority of households in Long Island's R/ECAPs have access to private vehicles, but most have limited access to public transportation. However, there are marked differences in service in different parts of Nassau and Suffolk.
- A number of R/ECAPs in the lower Hudson Valley enjoy good bus service and/or commuter rail service. However, R/ECAPs to the north and west experience lower and less direct levels of service.

- R/ECAP neighborhoods in Coastal Connecticut are served by local bus service, but frequency varies. Rail service is available either by foot or local bus. Barriers include sometimes limited span of bus service, poor pedestrian conditions and cost.
- Several planned or potential investments, from improved bus service to bus rapid transit to improvements in commuter rail service could expand service and job access to E/ECAPs. Significant capital expenditures in fixed transportation infrastructure can lead to greater private investment and rising home prices. These can improve neighborhood conditions but also make the area less affordable to existing residents.

IDENTIFICATION AND ASSESSMENT OF FAIR HOUSING ISSUES, SERVICES AND ACTIVITIES

- The federal Fair Housing Act is the fundamental law for combatting discrimination in the provision of housing and housing related services. In addition, both New York State and Connecticut, as well as several cities and counties in the region, have laws that further expand the classes protected against housing discrimination beyond those of federal law, such as protecting against discrimination for sexual orientation.
- More than half the fair housing complaints in the region allege disability discrimination, and race is the second most frequently cited bases of alleged discrimination – alleged in just under 25% of the cases in Connecticut statewide and just over 40% of the cases in the Consortium planning area in New York. However, fair housing complaints filed with HUD and state and county Fair Housing Assistance Programs have limited value in assessing the exact extent of discrimination in any particular area or on any particular basis because the frequency with which complaints are filed, or not filed, is influenced by many factors other than the extent of that type of discrimination.
- The discrimination ban that many advocates and stakeholders discussed as critically important to advancing fair housing goals, but missing in many parts of the region, is the protection against source of income discrimination. The State of Connecticut, New York City, Nassau County, and Westchester County have such a ban, but the other parts of the region do not.

- The most important way to understand housing discrimination is paired testing in which two people, one white and the other minority, pose as equally qualified homeseekers and inquire about available homes or apartments. But there is limited funding for testing, outside of the small pool of funds available through HUD's Fair Housing Initiatives Program (FHIP) program. While there is no regional compilation of testing results, testing conducted in Westchester, Long Island and New York City found significant unequal results – nearly half of the tests in several studies – in which African-American or Hispanic testers were treated differently from white testers, and that discrimination was concentrated in particular geographic areas.

Many stakeholders identified racial disparities in lending and mortgage default patterns in the region as a fair housing barrier. Numerous reports confirmed the disparities in defaults and access to conventional home mortgages. For example, reports from the New Economy Project found that two-thirds of the 90-day pre-foreclosure notices in New York City were sent to homeowners in communities of color, and that residents of predominantly white neighborhoods in New York City are twice as likely to receive a conventional home mortgage as residents of predominantly African-American or Hispanic neighborhoods.

IV. MAJOR CONCLUSIONS AND RECOMMENDATIONS FROM THE STAKEHOLDER ENGAGEMENT PROCESS

The Fair Housing and Equity Assessment was developed with the assistance of an Advisory

Committee consisting of 23 members representing fair housing practitioners, community development practitioners, for-profit and not-for-profit housing developers, organizations representing low-income communities and communities of color and community foundations. A list of member

organizations, which were intentionally balanced to have geographic representation from New York City, Long Island, the Hudson Valley and southwestern Connecticut, can be found in Appendix X. Additional outreach was conducted through five regional stakeholder meetings and eight public workshops.

The FHEA Advisory Committee played a key role in providing feedback on data analysis and drafts of FHEA chapters, and developing a detailed set of recommendations for consideration by the consortium Steering Committee. To provide a bridge between the deliberation processes of the advisory and steering committees, members of the steering committee participated in the advisory committee meetings, as did representatives of state housing agencies. The Advisory Committee met twice in person and twice by phone between October 2013 and February 2014, led by a facilitator retained by the consortium to build trust among the committee members and help it reach consensus on its recommendations. In addition, committee members participated in dozens of smaller conference call sessions and through written correspondence to provide input on the FHEA analysis and action planning.

Prior to convening the Advisory Committee, five stakeholder meetings were convened in June and July of 2013 in Manhattan, Farmingdale, White Plains and Bridgeport to obtain feedback on the initial findings of both the FHEA and consortium's study of regional planning gaps and enhancements. Meetings included many of the same fair housing, community development, developer, foundation and community organizations also represented on the advisory committee, plus public officials, planning organizations, business representatives and others. All of the output from these sessions led to refinements and further analysis, and helped to create and shape the role of the Advisory Committee and the agendas, format and presentation materials for the public workshops.

A total of 160 attendees participated in the eight workshops that were held in November and December of 2013, including local neighborhood groups, real estate developers, representatives from government agencies, developers of affordable & market rate housing and members of local commissions, task forces and community boards. Meetings were held in locations that were in or accessible to low income communities. Translation services were available upon request and were provided at four of the eight workshops where simultaneous translation services enabled full participation by non-English speakers. Resident participation was strongest in Hempstead and Brentwood, where New York Communities for Change and Make the Road New York encouraged their members to attend. The session with Make

the road New York members was conducted almost entirely in Spanish with the assistance of simultaneous translation between workshop staff and attendees.

A full summary of comments from the workshops can be found at www.sustainablenyct.org/resources.

Themes included the need to expand the supply of housing at multiple levels of affordability, the importance of focusing on quality design and creating a diversity of housing types, the need to maintain existing units, barriers to housing ranging from the high cost of construction to poor credit scores and discrimination. Participant comments helped to reinforce and modify findings from both the FHEA and planning enhancements study.

ADVISORY COMMITTEE RECOMMENDATIONS

The full report and recommendations of the FHEA Advisory Committee to the Consortium Steering Committee can be found in Appendix B. Based on the findings in the FHEA and their own expertise, the committee found that government policies and practices at all levels contribute to racial and economic segregation, requiring a more active approach by government to further fair housing. To that end, the Advisory Committee recommended numerous strategies that will require or encourage federal, state, regional, county and local government to affirmatively act to reverse these trends. These actions are summarized below and detailed in the full report, which also describes the type of community where the strategy is most appropriate and the level of government that is responsible for its implementation.

Section I. Strategies to strengthen the anti-discrimination investigation and enforcement system

- Increased federal, state, and local funding for strategic fair housing enforcement testing;
- Adoption and enforcement of state, county, and local “source of income” anti-discrimination laws;
- Assessment by HUD of “substantially equivalent” entities to ensure meaningful investigation and enforcement of fair housing complaints;
- Use of the State Attorney General and other state enforcement agencies to bring legal actions to

address fair housing violations;

- Use of state authority and resources to investigate real estate licensees accused of fair housing violations and make public such accusations;
- State and local legislative action to requires condominiums and cooperatives to disclose their reasons for rejecting applications;
- HUD enforcement of affirmatively furthering fair housing obligations.

Section II. Strategies to enhance the engagement of low- income people and underrepresented racial and ethnic minorities in local and regional planning

- Funding for, and implementation of, state, county, local jurisdiction, and Metropolitan Planning Organizations (MPOs) partnerships with community-based organizations to educate and engage members of low-income communities in housing-related decision-making;
- Development of and commitment to community engagement best practices.

Section III: Strategies to promote investment in and revitalization of Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) and high-poverty communities while protecting against displacement

- Investment by transportation operators/service providers, counties, and local jurisdictions in transit-oriented investment (TOD) with mixed-income housing, including very-
- low and extremely-low income housing, where conditions suggest TOD investment will improve neighborhood conditions and foster mixed-income neighborhoods;
- Extension, strengthening, and expansion of the New York State rent control and stabilization laws;
- Increased federal, state, and local resources for rehabilitation of existing, occupied extremely-low income housing, especially public housing;
- Investment in redevelopment of public housing to replace existing units with new housing in

mixed-income settings while preserving or expanding the number of extremely-low income units;

- Investment in and administration of local job training and job placement services;
- Adoption and enforcement of local income-based hiring preferences and living wage requirements;
- Increased support for code enforcement;
- Adoption and enforcement of local mandatory inclusionary housing ordinances;
- Preservation of affordable housing by local jurisdictions when affordability requirements are expiring;
- Additional investments in transportation services that connect local residents to job centers.

Section IV. Strategies to promote new affordable housing in high-opportunity areas

- Adoption of a New York State builder's remedy law modeled after Connecticut General Statute Sec. 8-30g and Massachusetts 40B as well as other state incentive programs to promote the development of new affordable housing in high-opportunity areas;
- Collaborative efforts to build community support for affordable housing development;
- Assessment and strengthening of the Long Island Workforce Housing Act;
- Increased state and federal funding for extremely-low- and very-low-income housing development;
- Increased state and county funding for infrastructure investments to ensure appropriate sites are prepared for greater density of affordable multifamily housing;
- Adoption and enforcement of local mandatory inclusionary housing ordinances;
- Conditioning local jurisdictions' receipt of county and state competitive funds on municipal actions to overcome zoning barriers and promote

affordable housing.

Section V. Strategies to ensure that underrepresented racial and ethnic minorities, low-income families, and other protected groups have access to affordable housing in high-opportunity areas

- State, local, and county enforcement of affirmative marketing and mobility counseling requirements;
- Region-wide marketing and coordinating listings of housing openings;
- Elimination of the use of discriminatory local preferences for housing;

Section VI. Strategies to stabilize housing opportunities for middle and moderate-income families

- State and federal investigation and enforcement to address redlining, steering, predatory lending, and other discriminatory lending practices;
- Creation by the U.S. Department of Housing and Urban Development (HUD) and the U.S. Consumer Financial Protection Bureau (CFPB) of a database of mortgage defaults and foreclosures as required by Dodd-Frank Wall Street Reform and Consumer Protection Act;
- Investment in and administration of foreclosure prevention counseling.

Section VII: Strategies to advance regional approaches to affordable housing

- Creation of a roundtable of jurisdictions, practitioners, developers, organizers and membership organizations, advocates, attorneys, and business leaders to share best practices across the region.

Section VIII: Strategies to ensure regional infrastructure planning and investments incorporate equity considerations

- Requirement imposed by U.S Department of Transportation on MPOs to consider state and municipal housing plans in developing regional

transportation and other plans and document how proposed investments and services would impact the objectives of local housing plans;

- Reduced transportation fares;
- Increased access to job centers through strategic transportation investments by MPOs.

The Advisory Committee’s discussions, report and recommendations informed the consortium’s deliberations and the actions it proposes, which can be found in Section 4, “Implementing the Regional Sustainable Development Vision.”

In addition, the dialogue initiated with the Advisory Committee process is an important action in and of itself. There was no previously existing forum for housing advocates and practitioners from different perspectives from throughout the New York-Connecticut region to collaborate with each other and with the governmental entities represented on the consortium. Even in the compressed timeframe in which the committee tackled numerous complex issues, members learned from each other and made connections that will be of value for ongoing research, advocacy and policy implementation. Some steps to broaden and continue this conversation are proposed in Section 4, and many members of the committee lead or participate in other collaborations where strategies can be further developed.

c. Barriers to Implementing Sustainable Transit-Oriented Development

I. COMMON CHALLENGES

Barriers to implementation of equitable and resilient transit-oriented sustainable development (TOD) have been identified both through the analysis of existing gaps in regional planning requirements and processes and through implementation of actual TOD projects supported by the Consortium's planning program. Projects included feasibility studies for new rail stations and associated transit-oriented development (Bridgeport, Stamford), designs for improved physical accessibility with rail service and better neighborhood connections to transit (Norwalk, Bronx), design and implementation strategies for station expansion and adjacent TOD (New Haven), station neighborhood redevelopment and regulatory updates (New Rochelle, East New York, Nassau County, Suffolk County), and a toolkit for neighborhoods to identify strategies to improve resilience to the impacts of climate change (prepared by and for the City of New York but replicable across the region).

These "place-based" projects provided a laboratory to identify where existing planning and implementation systems fail at the project level or unintentionally complicate implementation, and how additional funding or changes to procedures or criteria might facilitate implementation of equitable TOD and broader sustainable development projects. Implementation steps for the various projects include regulatory actions which may require community or political support and investments to be made by public and private entities. Implementation will require the support and participation of numerous government agencies and funding sources as well as the support of the private sector.

Despite the variety represented by the Consortium's place-based projects, several common themes emerged with regard to barriers faced by individual projects. Challenges to implementation often involve uncertainty over **best practices, difficulties developing community consensus** around development goals, a **lack of pedestrian and**

transit services between transit nodes and other destinations, **uncertainties of project costs and timing**, and a **lack of funding** for planning and capital investments. These challenges are summarized below, followed by a selected list of proposed solutions.

INFORMATION/BEST PRACTICES

Many of the Consortium's place-based projects uncovered a need for better guidance on specific planning issues.

Parking

Existing parking guidelines either formally or informally established in land use planning and decision-making were developed before TOD and community place-making became major goals of land use policy, but replacement guidelines have yet to be established that assist community decisions. Case study information that can assist municipalities to determine how much parking to require as a component of new development must currently be researched on a case-by-case basis. The Consortium's two rail station feasibility studies in Stamford and Bridgeport had to balance the goal of creating walkable centers around rail stations which maximize rail-accessible housing and commercial activity with the continued demand for commuter parking at rail stations.

The number of parking spaces required for new development is currently determined by municipal regulations and by potential investors guided by national standards, or by transit operators concerned about supplying commuter parking at existing or proposed rail stations. Clearer guidance from a nationally-recognized institution that helps communities to consider current land use mix, the availability of transit connections, and long-term neighborhood goals to determine appropriate parking levels would help communities streamline the permitting process while minimizing land and capital invested in parking facilities. District-wide planning for parking can prevent the need for every parcel to provide its own dedicated parking, supporting a shared parking resource and more efficient use of both land used for parking and more active land uses.

Flooding and Storm Damage

A second area where better information can direct implementation by Consortium members and other entities is related to development policies in areas at risk for flooding or other storm damage. There is a need for reliable scientific information about projected sea level rise and flood risk for individual parcels and a better understanding of the long-term effectiveness of potential flood control measures. These two factors impact the ability to assess the long-term risk of flooding and can help identify where design solutions can support the viability of existing neighborhoods and where retreat is truly the best option for vulnerable areas.

The State of Connecticut currently prohibits state investments in properties at risk for flooding, which impacts redevelopment in communities such as Norwalk, where flood issues are common in the neighborhood surrounding the South Norwalk Train Station. A more nuanced state policy could be developed given better information about risks and especially about the efficacy of strategies to prevent damage from frequent flooding. New York City’s consortium products *Designing for Climate Risk* and *Urban Waterfront Adaptive Strategies* helped to identify appropriate actions for building architecture and flood protection measures in neighborhoods representing much of the diversity of the region’s places, and are now a resource that Consortium members and others can take advantage of in assessing risk and response. More information of this type is needed to inform local decisions.

Mixed-Income Housing Design

Community discussions about housing often reveal a common concern that new low-income housing will resemble the public housing “projects” of the 1960s and ‘70s and that housing built today would suffer the same decline felt by much of that era’s public housing. Missing from the conversation is awareness of what affordable housing has been built in the area within the last decade, because in many cases this housing is indistinguishable to market rate development. Community members also do not understand the funding challenges faced by both market-rate and subsidized-housing development. A resource that makes available best practices in affordable housing development that features real projects built in the last few years within the

immediate region could help facilitate a productive conversation about how to satisfy needs for affordable housing in ways that meet community goals.

Challenge	Where Felt
Need for information about projected climate impacts and flood risk, and effectiveness of flood control measures	Bridgeport, New York City, Norwalk
Lack of guidance re parking best practices	Bridgeport, Stamford, New Rochelle, New Haven, Nassau County, Norwalk
Guidance needed on how to incorporate existing industrial uses in TOD neighborhoods	Southern Westchester East-West Corridor
Best practices in affordable housing development	Bridgeport, New York City, Norwalk, Nassau, Suffolk, New Rochelle

Figure xvii. Mixed-Income Housing Design Challenges

Community Consensus and Ongoing Local Support

Existing residents often actively oppose new TOD development due to concerns that it will cause additional traffic congestion, that low-income or tax-exempt housing will reduce the tax base while requiring municipal services, or that higher-density housing will be unattractive and/or fall into disrepair. Prejudices against low-income and renter households also play a part in local opposition to new development. Many of these concerns can be identified and addressed through an extensive public planning process that establishes clear community goals and then links land use regulations and other policies directly to these goals, but uncertainties as to future opposition increase the risk for the private sector and can discourage elected leaders from taking leadership roles. Municipal planners must balance the need for flexibility in future uses with the demand from both local residents and the development community for clear guidance on what will or will not be allowed in the future. Planning at the county or regional level must also engage local residents and municipal governments on a consistent basis, but resources are not always available to do so.

The Consortium’s planning program provided resources to communities to consider controversial questions impacting how they will change and develop over time. Decisions about infrastructure investments and future land use impact the people who will be living and working in a neighborhood in the future and how existing residents will be affected by change. Key to developing an effective community participation process is to 1) provide a forum where community concerns can be identified and considered within the planning process, and 2) develop an ongoing mechanism for information flow between administrators and stakeholders. Also important is to prevent “planning fatigue” by implementing early action items that demonstrate that plans will be implemented and not sit on a shelf. Examples of high-quality mixed-income development built within the region should be publicized as a component of the discussion, since “affordable housing” for many residents still means the apartment towers of the ‘60s and ‘70s, which have in many places fallen into disrepair or since been demolished.

parks that are difficult to serve with transit or even walk to from nearby neighborhoods; and “last-mile” conditions, particularly in suburban settings, where employment and homes are near bus and rail transit, but the distance and lack of quality pedestrian infrastructure discourages use. The Consortium’s I287 corridor charrette explored ways to retrofit office parks for new uses, and found that conditions such as one-way access roads make transit service to those parcels difficult to provide. Work in the Bronx identified how to encourage the use of existing and proposed Metro-North rail service that would connect local residents with job opportunities in Westchester County and Connecticut through addressing pedestrian barriers and improving the visibility and security of rail stations. In the Bronx and elsewhere, future regional rail ridership gains may come from off-site improvements to community design and pedestrian networks and through the growth of transit-oriented development, as well as improvements in the reliability and frequency of transit service.

Challenge	Where Felt
Lack of consensus; active opposition to new development and its effects on additional transportation demand or change in community character; lack of communication between TOD developers and civic organizations	Stamford , New Rochelle, Nassau County
Public opposition to both rental and affordable housing; oppositions to density, property taxes, renter characteristics; project branding and public identification	Southern Westchester East-West Corridor, Nassau County, Suffolk County

Figure xviii. Community Consensus and Ongoing Local Support Challenges

The continued siloing of resources between transportation, housing, energy, and economic development projects – as demonstrated by the varied federal legislative processes and funding programs which make resources available -- makes it difficult to assemble complementary resources from agencies responsible for funding for services such as brownfields remediation, investments in market-rate and affordable housing, incentives for economic development projects, and capital and operating investments in transit. Municipal land use and comprehensive planning goals must also be coordinated with regional transportation planning decisions. Sustainable development projects such as Bridgeport’s Barnum Station project will require the combined efforts of multiple state and federal agencies to complete the station, associated infrastructure, and environmental remediation, and to incentive private investment in the corridor. In the Bronx, proposed commuter rail service on the Amtrak’s Hell Gate Line will require participation and investment by the federal government, states, and communities that will stand to benefit from improved regional access.

Transportation Accessibility

The “siloing” of transportation and land use decisions results in on-the-ground challenges in connecting neighborhoods with employment destinations and also complicates implementation of comprehensive sustainable development and eTOD plans. Existing conditions include high-volume arterial roads that run through traditional downtowns, discouraging walking, transit, and place-making; corporate office

Programmatic and Permitting Processes

As mentioned above, further implementation of many of the Consortium’s place-based projects and execution of its regional vision for sustainable development will require the participation of multiple government entities ranging from local regulatory bodies all the way up to different federal agencies. Navigating the application procedures and reporting required by multiple agencies for permits and funding support is complex. A community’s ability to navigate application processes is dependent on the capacity of individual municipal staff members and municipal boards. Expanding the pool of programs that can support complementary land use and transportation projects will expedite implementation and result in better on-the-ground outcomes.

Implementation of community land use plans is also dependent on decisions made by other agencies and key entities which have their own decision-making processes and timelines for action. In the Bronx, for example, local land use planning outcomes are impacted by decisions made by MTA about the management and/or disposition of MTA-owned assets in and around rail stations. Thus, the onus is the organizers of projects of this type need to employ collaborative approaches which bring transit providers together with a range of other parties and interests to the project planning process table.

Challenge	Where Felt
Multiple applications and permits for funding/aid; complex reporting requirements	Bridgeport, Norwalk, I287 Corridor
Programmatic restrictions limit use of certain programs in interdisciplinary TOD projects	New York City, Bridgeport, Long Island Housing
Recommendations for long term land use enhancements requires evaluation and management of assets owned by other institutions or authorities (e.g. MTA)	Bronx, East New York
Varying capacity of municipal staff and boards to navigate complex approval processes	I287 corridor, Southern Westchester East-West corridor

Figure xix. Programmatic and Permitting Processes Challenges

Funding

Implementation of community-based TOD projects such as a new rail station on the East Side of Bridgeport will require coordinated funding for implementation steps throughout the process: funding for additional planning; environmental and engineering work to design station, roadway, and other infrastructure improvements; brownfields remediation; funds to assemble and purchase properties or facilitate the private sector in doing so; funds to enable an update to local land use and zoning regulations; and, not insignificantly, funding to build and then operate a new commuter rail station that will be the anchor for the neighborhood. In New Haven, re-programming and expansion of train station and rail parking facilities is part of a larger plan to improve rail connections between the rail station, downtown New Haven, and neighborhoods, and each component project has many benefits beyond particular program focuses, so allowing for more flexible use of transportation and community development funding sources would streamline implementation and result in integrated planning outcomes.

Funding to prevent flooding and storm damage is also needed in many of the region’s communities, where vulnerability to sea level rise and extreme weather caused by climate change will also necessitate the design and construction of new flood control measures and require some replacement of existing coastal infrastructure.

The provision of housing affordable to a range of incomes and family sizes and preservation of existing homes is also made difficult by a lack of overall funding for housing and programmatic restrictions which allow only construction of housing for specific income ranges. Funding for extremely-low income residents and for middle-income residents is a particular challenge. In many of the Consortium’s communities, existing public housing complexes must be rebuilt and/or relocated due to vulnerability to flooding. Construction costs in the metropolitan New York region make it difficult even to construct new housing for middle-income and upper-middle-income residents, especially when structured parking must be built as part of development. And in areas such as Bridgeport, Stamford, and the Bronx, where new transit services may drive up rents, there will be a need to preserve affordable units to prevent gentrification from pushing out existing residents.

Challenge	Where Felt
Site assemblage and purchase	Stamford, Bridgeport, New Rochelle
Lack of funds for predevelopment planning	Bronx
Funds for rail, transit or roadway infrastructure; reliance on capital investment from multiple agencies	All CT projects, New Rochelle, Bronx
funding streams for transportation projects preclude use for related land use planning (i.e., CMAQ); diminishing availability of federal resources (e.g., CDBG funds) for important planning functions	New York City
Need for additional flood protection measures	Norwalk, New York City
Expanded housing production, especially for very-low income and middle-income occupants	New York City, Bridgeport, New Haven, Nassau, Suffolk
Preservation of existing subsidized and market-rate affordable housing	New York City, New Haven, Bridgeport, Norwalk

Figure xx. Funding Challenges