

Analysis of Impediments to Fair Housing:

City of Watertown, NY 2015



Prepared by City of Watertown
Office of Planning and Community Development

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EXECUTIVE SUMMARY

This Analysis of Impediments to Fair Housing for the City of Watertown was conducted in-house by staff of the City of Watertown Office of Planning and Community Development and the City of Watertown GIS Department. As an Entitlement Jurisdiction under the U.S. Department of Housing and Urban Development, the City of Watertown has certified that it will affirmatively further fair housing, which includes preparing an Analysis of Impediments to Fair Housing.

City staff reviewed Census data, created maps based on that data, analyzed previous plans and other documents, and attended a roundtable discussion of local housing experts in the process of creating this document.

Profile of City of Watertown---

Watertown is one of the few cities in upstate New York that has actually gained population since the year 2000. Much of that growth stems from increased activity at nearby Fort Drum as a result of the recent conflicts in Afghanistan and Iraq. The growth spurred by Fort Drum, which began in earnest with the stationing of the 10th Mountain Division there in 1984, reversed decades of population loss that resulted from a decline in the manufacturing sector.

The City's population is mostly white, and although relatively few minority residents live within the City limits, measurable concentrations of minorities do exist, as do concentrations of poverty and of the disabled population, which is Watertown's most significant protected class.

Housing Profile---

Watertown's housing stock is much older than the national average, meaning many units are imperfect homes for families with children or those with disabilities due to the presence of lead-based paint or a lack of accessibility. The most significant housing problem, however, is affordability. This is linked to the proximity of Fort Drum and the effects of the Army's Basic Allowance for Housing on the local rental market. Housing cost burden, especially among renters, is a serious challenge in the City of Watertown.

Impediments and Recommendations

City staff have identified four major impediments to fair housing choice in the City of Watertown. First and foremost, the US Army's Basic Allowance for Housing drives up the cost of housing in the city, making it difficult for low-income, non-military families to find affordable housing. Second, the City of Watertown has a far older housing stock than the nation, or even the state, as a whole, which limits housing choice for households with small children and people with disabilities. Related to this, use of tenant-based rental assistance vouchers is concen-

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trated in the parts of the city with the oldest housing stock and highest poverty rates. Finally, a general lack of knowledge about Fair Housing rights, among both tenants and housing providers, creates an environment in which disabled residents continue to endure undue hardships.

Recommendations that Staff have proposed to address the first impediment include advocating for affordable units in new multi-family housing developments, utilizing flexible zoning tools such as density bonuses to generate additional affordable units, and supporting New York State Assembly Bill A.5155, introduced in February 2015, which would add source of income as a protected class in New York.

To address the second impediment, staff recommends continuing to use grant funds to support local nonprofit entities in their efforts to rehabilitate older housing units within the city and continuing to make the rehabilitation of older units a priority in the City's Consolidated Plan and Annual Action Plans. Staff further recommends advocating that developers to go above and beyond the legal requirements for accessible units in new multi-family construction and that the City explore the feasibility of creating a city-wide home accessibility program using CDBG funds.

To address the other impediments, staff recommends modifying the rental-and-owner occupied rehabilitation programs in the Consolidated Plan and Annual Action Plans to target all areas of the city and to work with the Community Action Planning Council of Jefferson County to provide Fair Housing training to housing providers.

INTRODUCTION

Following the 2010 United States Census, the White House Office of Management and Budget designated the Watertown-Fort Drum, NY urbanized area as a Metropolitan Statistical Area (MSA), with Watertown identified as the principal city. As a result, the City of Watertown, which had previously participated in New York State's Community Development Block Grant (CDBG) Small Cities Program, became a CDBG Entitlement Community, now receiving its funds directly from the U.S. Department of Housing and Urban Development (HUD).

As recipients of CDBG entitlement funding from HUD, the City of Watertown has certified that it will affirmatively further fair housing. In certifying this, the City is required to complete an Analysis of Impediments to Fair Housing Choice (AI), which consists of identifying impediments or barriers to fair housing and developing strategies to address those barriers.

Since 1994, Jefferson, Lewis and St. Lawrence Counties have operated cooperatively as the North Country Home Consortium (NCHC). The NCHC receives an annual allocation of Home Investment Partnerships Program (HOME) funds directly from HUD. As such, the NCHC has also certified that it will affirmatively further fair housing and bears the same requirement to complete an AI at regular intervals.

Given that the NCHC consists of three counties, and since the City of Watertown was never previously an entitlement community under CDBG, previous iterations of the NCHC's AI were region-wide analyses and did not include City-specific sections.

This Analysis of Impediments was prepared to fulfill the City of Watertown's certification that it will affirmatively further fair housing, as well as to serve as a City-specific chapter within the NCHC's AI. The timing of this document was intentionally aligned with the NCHC's preparation of its own AI, as the City and the NCHC work to synchronize their five-year Consolidated Plan cycles with one another.

Overview of Fair Housing Laws---

The Fair Housing Act of 1968 prohibits discrimination in housing based on race, color, religion, and national origin. Congress amended the Fair Housing Act in 1974 to include sex as a protected class, and in 1988 to include disability and familial status as protected classes. The Fair Housing Act specifically identifies a number of prohibited practices with the intent of shielding protected classes from discriminatory behaviors, both explicit and indirect.

In addition to the above Federal law, New York State Executive Law §296 prohibits discrimination on the basis of race, color, creed, national origin, sex, familial status, disability, age, marital status, military status, and sexual orientation.

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Defining the Analysis---

As defined by HUD, impediments to fair housing choice are:

Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices.

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

HUD defines an Analysis of Impediments as a review of impediments to fair housing choice in the public and private sectors. An AI involves conducting a comprehensive review of a State or Entitlement Jurisdiction's laws, regulations, and administrative policies, procedures, and practices, and how those laws, etc. affect the location, availability and accessibility of housing. An AI also assesses conditions, both public and private, affecting fair housing choice for all protected classes, and assesses the availability of affordable, accessible housing in a range of unit sizes.

This analysis seeks to identify and prioritize the most significant impediments to fair housing within the City of Watertown, and develop strategies and goals for addressing those impediments.

Methodology---

The primary data sources of for this report are the 2009-2013 American Community Survey 5-year estimates from the US Census Bureau. This data was the basis for all but one of the maps included in this report, which were created by City staff. Many of the maps depict data at the block group level, and this level of analysis was used wherever possible. However, because of privacy concerns, the U.S. Census Bureau does not release information for some topics at any level of detail more specific than the census tract level, and this level was used when necessary. Additional data for maps relating to tenant based rental assistance was acquired from Lewis County Opportunities.

This analysis also included a review of various documents, including the City of Watertown's first Consolidated Plan and the North Country Home Consortium's 2011 Analysis of Impediments to Fair Housing. Since this was the City's first experience with publishing an AI, City staff also reviewed the 2014 AI for the City of Syracuse and Onondaga County, published by CNY Fair Housing, which helped serve as a valuable template in creating this document.

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In April 2015, Jefferson County, as a part of their research for the NCHC's AI, held a Fair Housing Roundtable event in the City of Watertown. Executive Director Sally Santangelo of CNY Fair Housing facilitated this event and led the roundtable discussion. She also presented findings from her own extensive research of Fair Housing impediments. City staff attended this event, which was also attended by staff members from other local governments as well as various nonprofit groups familiar with housing issues in the North Country.

In August 2015, the New York State Office of Homes and Community Renewal held a Fair Housing meeting in the City of Watertown, which was one in a state-wide series of meetings that NYS HCR was conducting as a part of preparing a state-wide AI. City staff attended this meeting as well, which was also attended by planning staff from two neighboring counties as well as a local property manager. Discussion and discourse from both of these events contributed to this report.

Finally, locally collected statistics, including tenant-based rental assistance data from Lewis County Opportunities as well as qualitative and quantitative data from the Watertown City School District, also contributed to this report.

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PROFILE OF THE CITY OF WATERTOWN

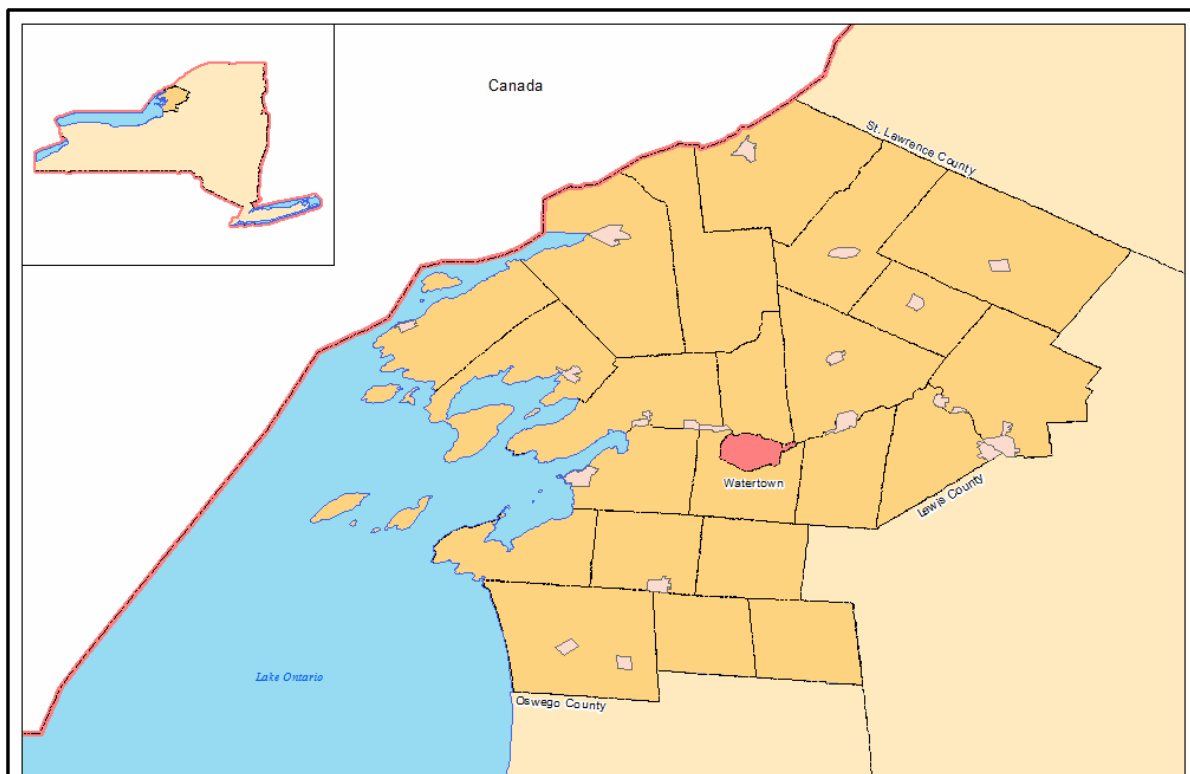
Geography and History---

The City of Watertown is located in Jefferson County in northern New York State. Jefferson County is bordered by St. Lawrence County to the northeast, Lewis County to the east, Oswego County to the south, Lake Ontario to the west, and the international boundary with Canada to the northwest. The City of Watertown covers approximately 9.3 square miles and is located in the center of the County, as shown in Figure 1.

The City of Watertown is one of the few cities in Upstate New York that is actually gaining population, having grown from 26,705 in 2000 to 27,023 in 2010 (a 1.2 percent increase) and to an estimated 27,453 in 2013 (a one 1.6 percent increase from 2010). In addition, Jefferson County is one of only two counties (Tompkins is the other) in New York State, outside of the New York City MSA, to have an estimated population growth above 2.0 percent from 2010-2013.

As of 2013, the City of Watertown accounted for approximately 23.3 percent of the population of Jefferson County, so while the county as a whole may be growing faster than the city, the City of Watertown remains the County's largest population center.

FIGURE 1: JEFFERSON COUNTY, NY AND THE CITY OF WATERTOWN



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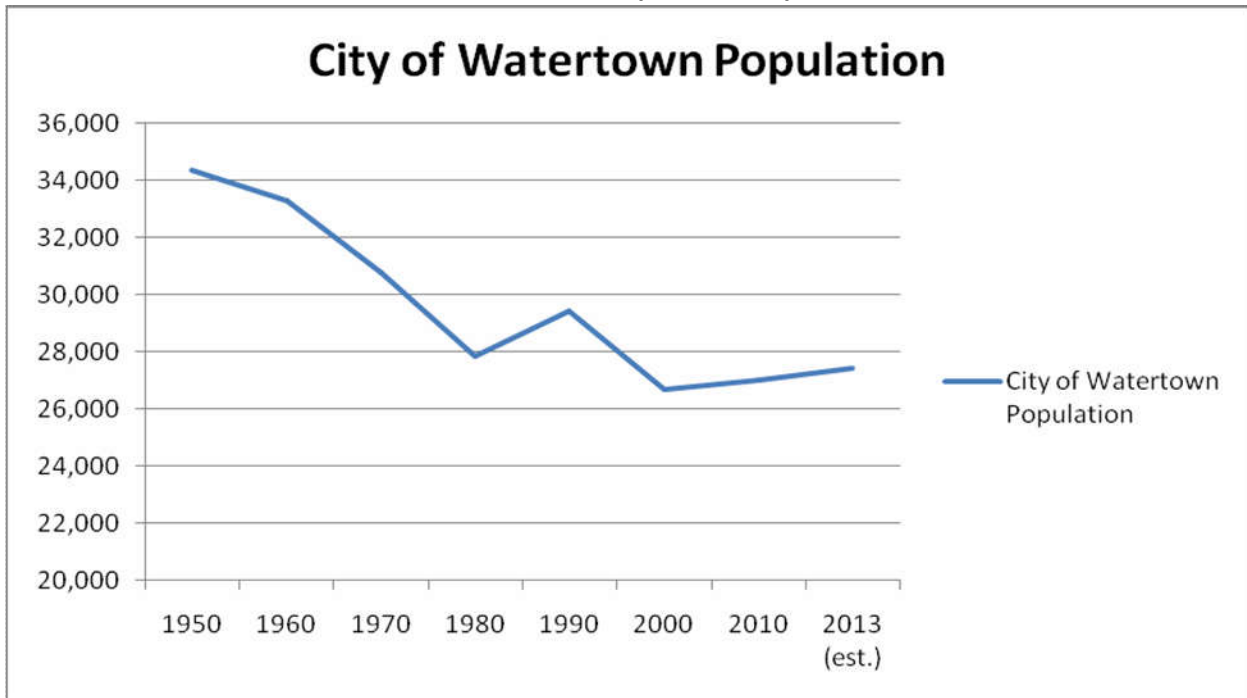
From Manufacturing to Military---

The recent population growth in the City of Watertown reverses a decades-long trend of population loss, as shown in Figure 2 below. Like many other small cities in the northeast, Watertown had a strong manufacturing history dating back to the mid-19th Century. The manufacturing sector drew people to the city for over 100 years until its decline in the 1970s. Between 1870 and 1950, the city grew from 9,336 to 34,350. However, by 1980, the population had declined to 27,861.

In 1984, the U.S. Army stationed the new 10th Mountain Division at nearby Fort Drum, which lies 8 miles northeast of the City of Watertown. Following this garrison, the population rebounded to 29,429 in 1990, but then resumed its decline, falling to 26,705 in 2000. Overall, Watertown's population fell by 22.3 percent between 1950 and 2000.

The modest population rebound since 2000 coincides with recent U.S. military campaigns in the Middle East. During the peak of the Afghanistan and Iraq conflicts, the fort saw a dramatic increase in troop levels, including the addition of a third Brigade Combat Team in 2004, which brought an additional 6,000 soldiers. As of 2015, an aggregate of approximately 21,000 soldiers and affiliated civilian employees worked on the base. While Fort Drum lost only 28 soldiers due to nationwide troop reductions in 2015, it is unclear how possible Federal sequestration in the future might affect the base beyond 2017.

FIGURE 2: CITY OF WATERTOWN POPULATION (1950-2013)



Sources: US Census Bureau and the Office of the New York State Comptroller

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Over the past half-century, Watertown has undergone a dramatic transformation from manufacturing hub to military town, which is the central reason that unlike many Upstate NY communities, Watertown has been able to reverse its prolonged population loss with modest growth. Fort Drum influences Watertown in ways both overt and subtle, from the soldiers that populate the city to the impact their purchasing power has on the local economy. The Fort Drum effect on the local housing market is significant, and is examined in greater detail in the Housing Profile section of this report.

Demographic Patterns---

Watertown’s population is overwhelmingly white. However, although the minority populations in Watertown are small, areas of minority concentration are identifiable. Table 1 below illustrates the racial makeup of Watertown’s population.

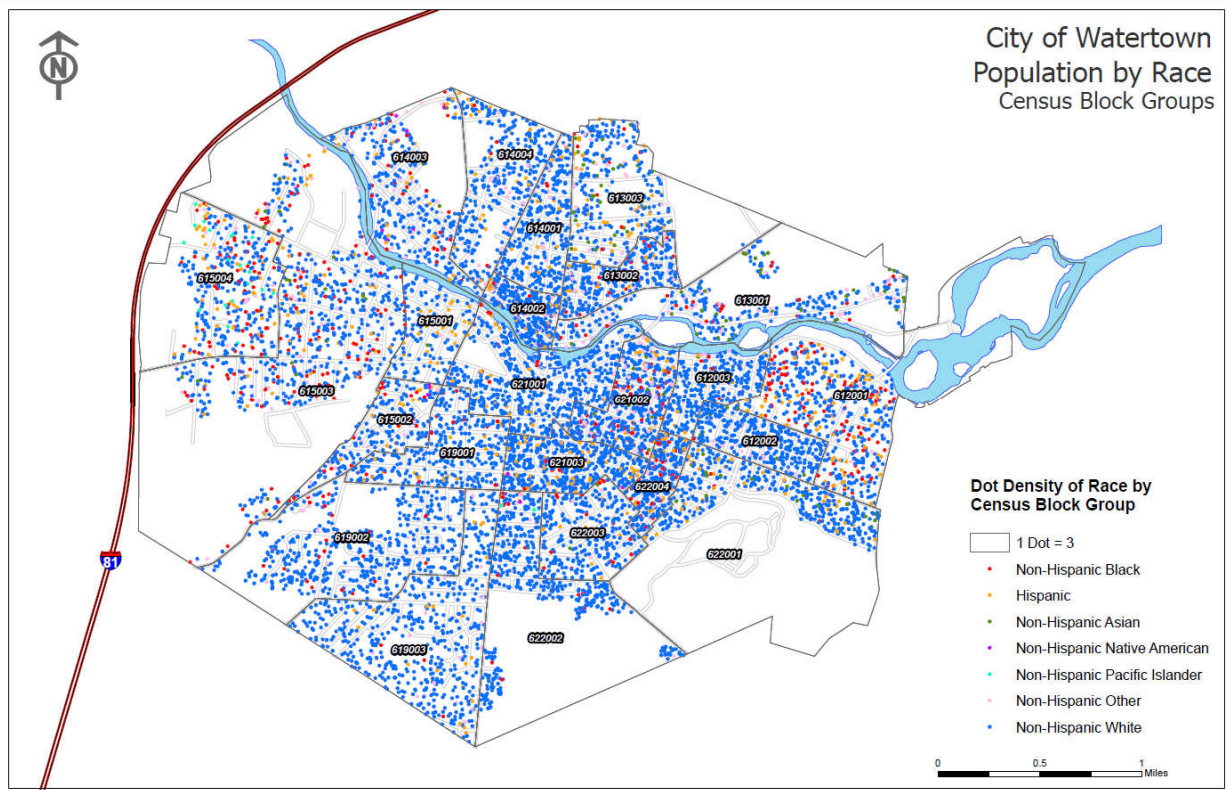
While the city’s population is approximately 82 percent White and approximately 6 percent each Black

TABLE 1: POPULATION BY RACE, CITY OF WATERTOWN, NY

Race/Ethnicity	% Pop.
Non-Hispanic White	82.2%
Hispanic	6.4%
Non-Hispanic Black	6.1%
Non-Hispanic Asian	1.4%
Non-Hispanic Pacific Islander	0.3%
Non-Hispanic Native American	0.2%
Non-Hispanic Other	3.4%

Source: 2009-2013 ACS 5-year estimates

FIGURE 3: POPULATION BY RACE, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

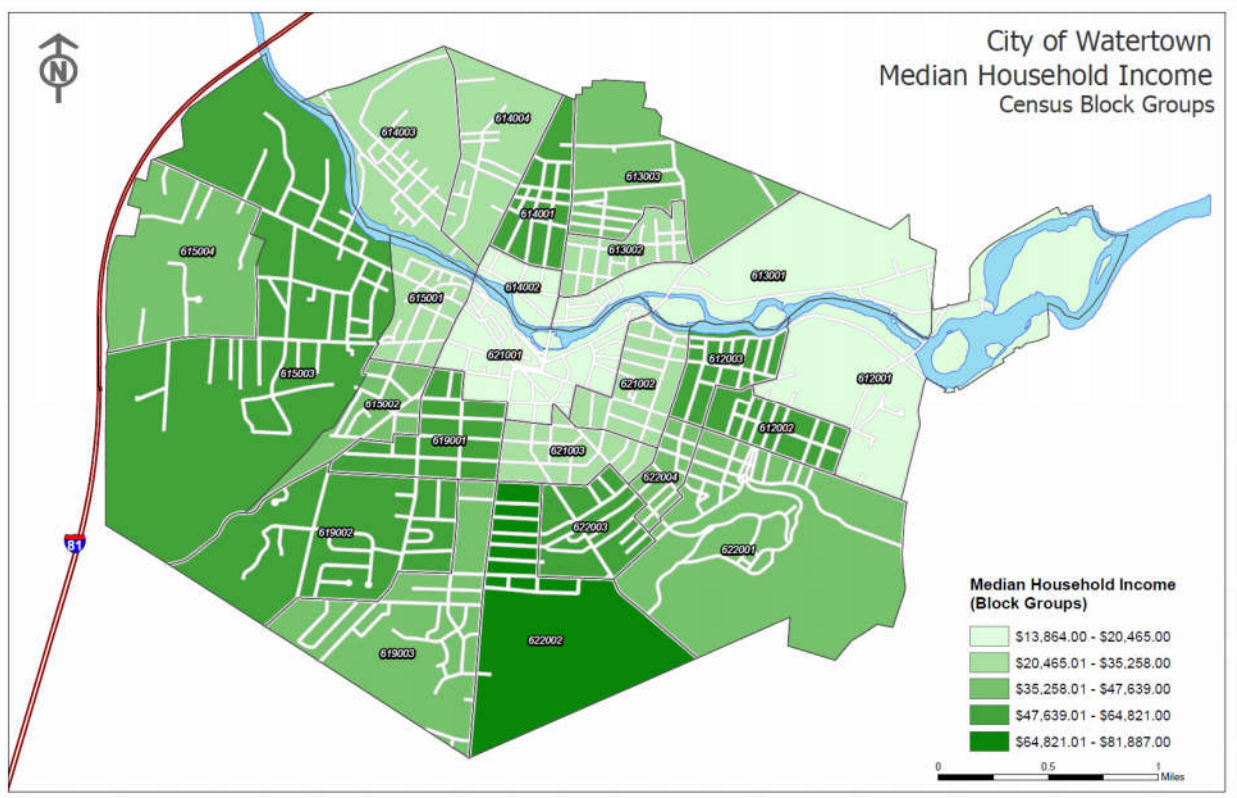
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and Hispanic, there are block groups where the percentage of Black and Hispanic residents reaches into the mid to upper teens. There are also block groups where there are either no Black residents or no Hispanic Residents at all, and that are over 90 percent White. Figure 3 illustrates the racial and ethnic composition of each block group within Watertown.

Concentrations of minority residents are observable at the far western and eastern ends of the city. These two block groups contain percentages of minority residents (38.0 percent and 34.3 percent respectively) that are roughly double the City-wide percentage of 17.8. Blacks and Hispanics make up the overwhelming majority of non-White residents in each of these block groups. Above-average percentages of Blacks and Hispanics are also observable in the other three block groups of Census Tract 615, which encompasses the west side of the city. The map also identifies a large population of Asian residents on the north side.

The two block groups with large concentrations of minority residents at the far western and eastern ends of the city are both identified in the City’s Consolidated Plan as CDBG Target areas, as both have LMI populations over 51 percent. However, while these block groups may be similar in that they have a diverse racial makeup, and even though both are majority LMI, the income disparity between them is actually quite stark.

FIGURE 4: MEDIAN HOUSEHOLD INCOME, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

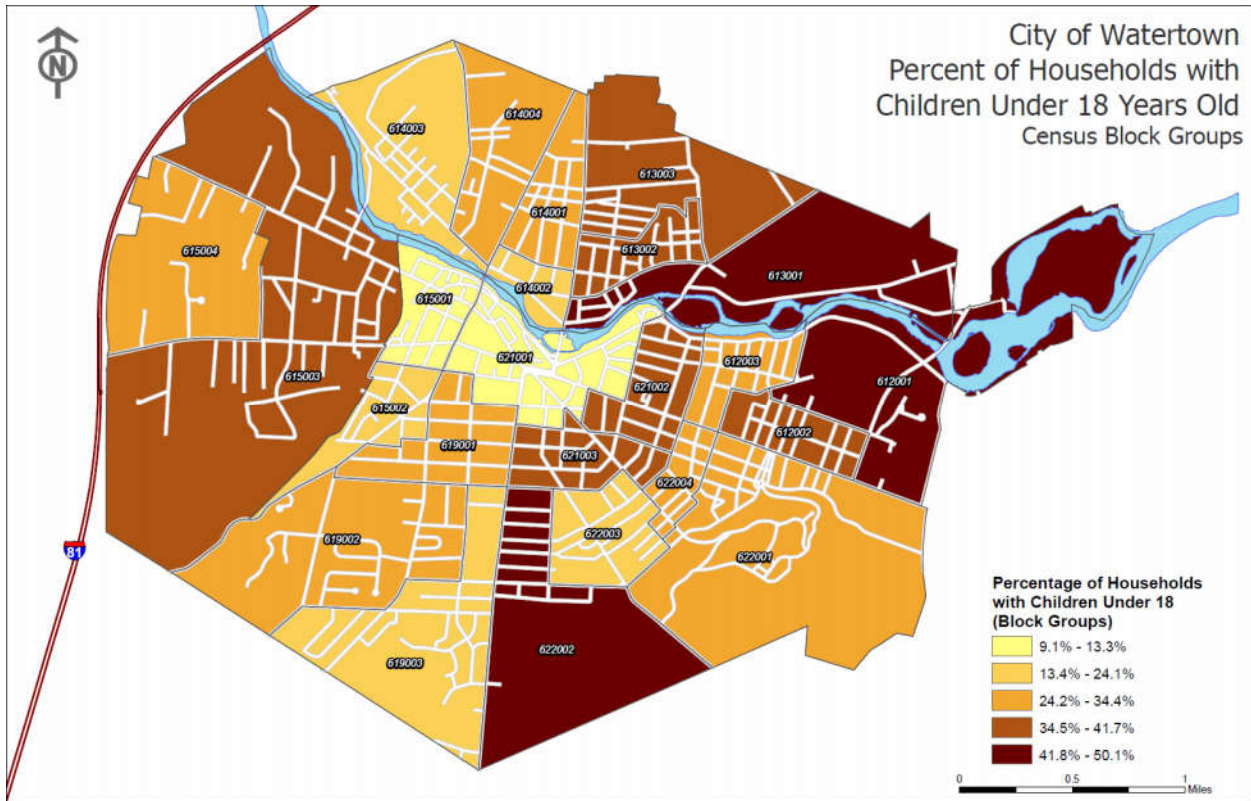
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Census Tract 615, Block Group 4 in the west has an LMI population of just 54.4 percent, whereas Census Tract 612, Block Group 1 in the east has an LMI population of 79.5 percent, the highest in the city. The difference comes into even clearer focus when median income is examined, and this is illustrated in Figure 4 on the previous page.

The downtown core stands out as having the lowest median household income in the city, with the block groups directly across the river from downtown and the far eastern block group also having noticeably lower median household incomes relative to the rest of the city. There are also some moderate income areas on the north side. With regard to the far western and far eastern block groups with high minority concentrations discussed above, the far western block group has a median income that is twice that of the far eastern block group.

This is where it is important to draw the distinction between LMI population and median household income. LMI population includes both low *and* moderate income households, so a cluster of moderate income households can pull up the median. When compared this way, although there are minority concentrations at both ends of the city, it is the block group at the eastern end where a racially and ethnically concentrated area of poverty exists.

FIGURE 5: PERCENT OF HOUSEHOLDS WITH CHILDREN UNDER 18, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

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Another significant difference between the block groups with minority concentrations at each end of the city is the presence of children in households, which is illustrated in Figure 5.

When comparing the two block groups at opposite ends of the city that were identified in Figure 3 as having minority concentrations, the far eastern block group not only has a noticeably higher percentage of households with children under 18, but in absolute numbers has the most such households in the city, with almost twice as many as the western block group.

Both of these block groups have an extremely low percentage of owner-occupied households (as shown in Figure 12 in the Housing Profile section). This is not surprising since each block group is home to multiple garden-style apartment complexes. Yet, to summarize their differences, one of these two areas of minority concentration has a median income that is double that of the other and has far fewer children, as well as fewer senior citizens (See Figure 8).

A possible explanation for this is that many residents in the far western end are military personnel who benefit from the Army's Basic Allowance for Housing, and might also be less likely to have children or seniors living with them. Whereas more residents of the far eastern end, which was identified above as a racially and ethnically concentrated area of poverty, are non-military households without the supplemental income that soldiers receive.

This difference is borne out in census data. According to 2009-2013 ACS 5-year estimates, in Census Tract, 615, Block Group 4 in the far west end, 36.3 percent of the population and 52.6 percent of the labor force is in the Armed Forces. By comparison, in Census Tract 612, Block Group 1 in the far east end, only 23.1 percent of the population and 34.9 percent of the labor force (almost 18 percent less) is in the Armed Forces. In terms of raw numbers, the far western block group has an estimated 542 non-military individuals living in it, while the far eastern block group has an estimated 864 non-military individuals living in it. This phenomenon will be examined in greater detail in the Housing Profile section of this report.

Census Tract 622, Block Group 002 on the south side of the city is where the single campus containing HT Wiley Intermediate School, Case Middle School, and Watertown High School is located, and half of all households in that block group have at least one child under 18. It is also by far the most affluent block group in the city, as illustrated in Figure 4. Census Tract 612, Block Group 1 at the far eastern end however, has the second highest percentage of households with children under 18, and is closely followed by the neighboring block group across the river.

Taken together, the two block groups that bound the Black River at the eastern end of the city have the second and third-highest percentages of households with children under 18, while simultaneously having the third and fourth-lowest median incomes in the city. A comparison of Figure 4 and Figure 5 demonstrates the volume of children in these extremely low-income

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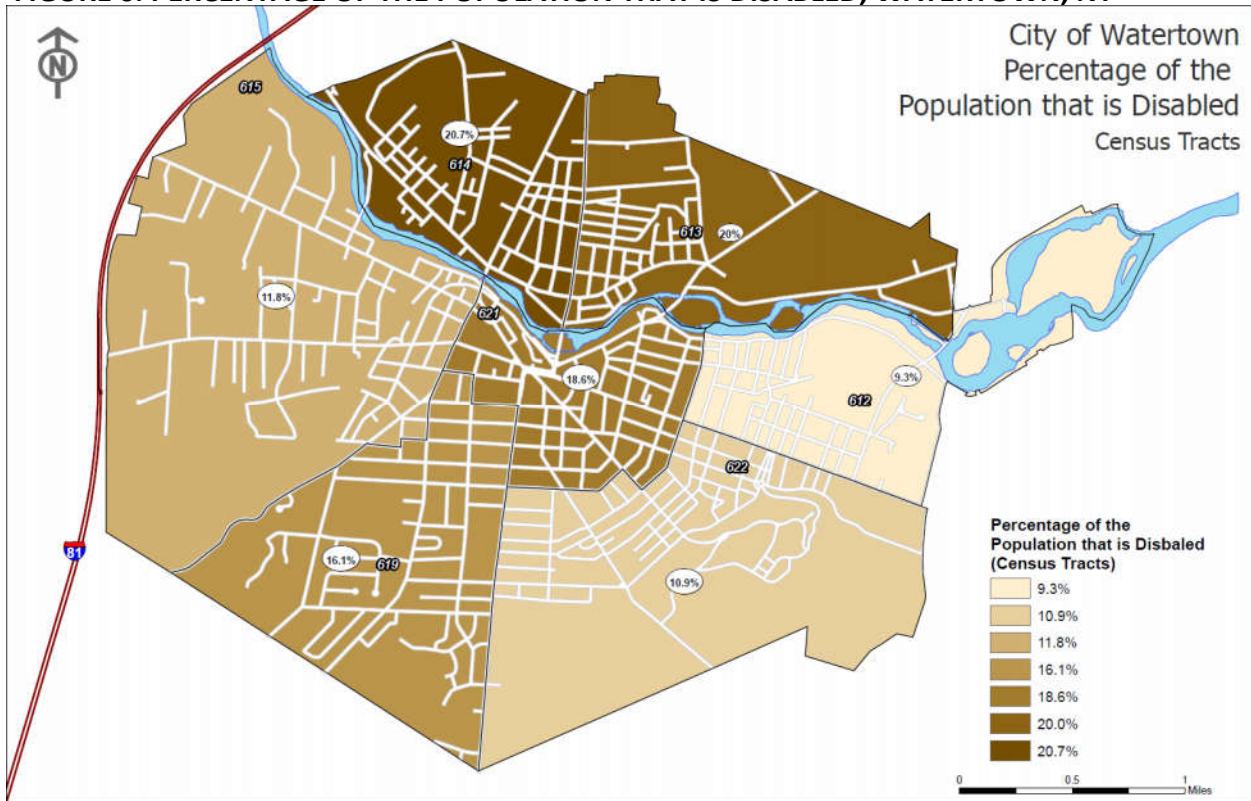
areas. For greater perspective, 13 percent of the households with children under 18 that are within the City limits are in these two impoverished block groups, both of which have minority populations of approximately 30 percent or greater.

In addition to the minority concentrations at the two ends of the city, there are also concentrations of people with disabilities in the north side of the city and in the downtown core. The percentage of disabled people in these three census tracts is approximately double that of the three census tracts with the lowest percentage of disabled people. This trend is identified in Figure 6.

These areas with a high percentage of disabled residents also exhibit high poverty rates. In a comparison of Figure 6 and Figure 7, the same three census tracts in the downtown core and the north side also have the highest percentages of people living in poverty, with the east side close behind.

It is worth pausing here to clarify some of these statistics. First and foremost, with the Consolidated Plan's emphasis on LMI individuals, it is necessary to illuminate that there is a difference between an area's percent LMI and its poverty, since a *moderate* income person is not

FIGURE 6: PERCENTAGE OF THE POPULATION THAT IS DISABLED, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

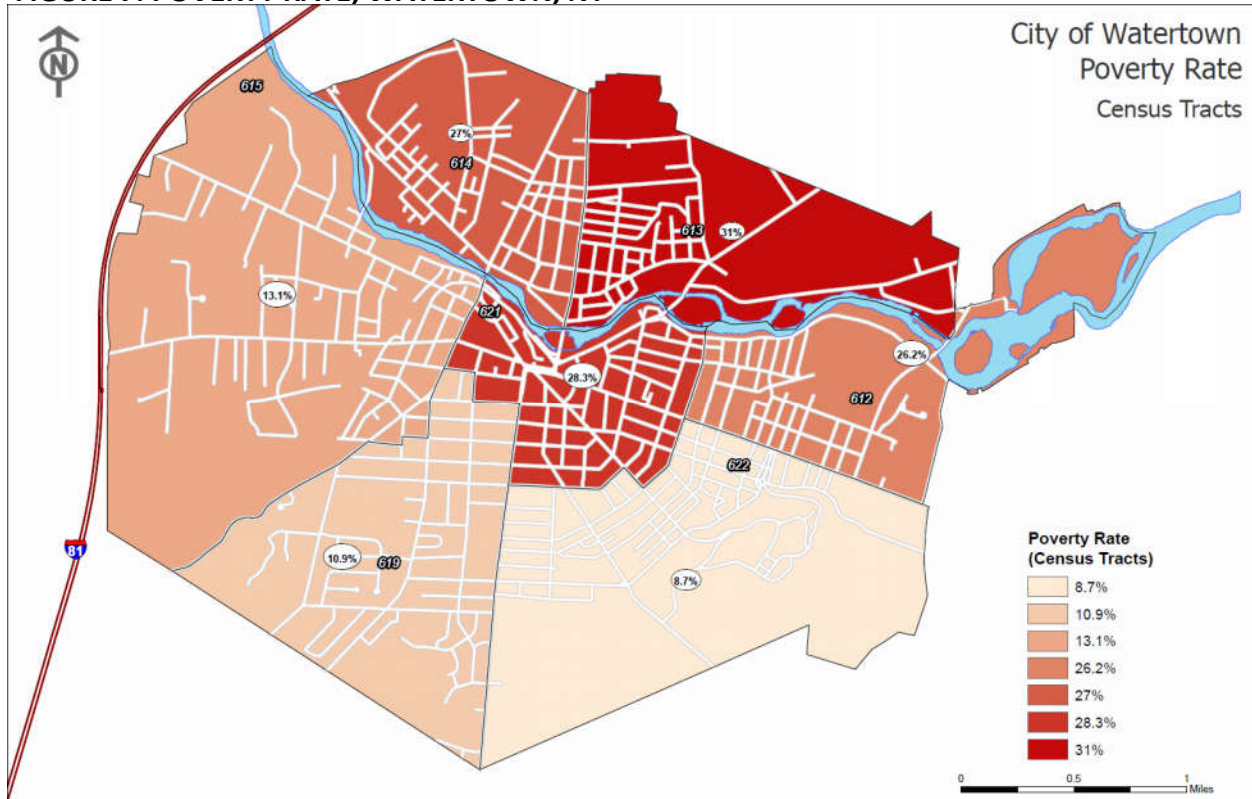
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necessarily living below the poverty line. This makes them two distinct metrics.

Second, since the U.S. Census Bureau only publishes Table S1701 - Poverty Status in the Past 12 Months at the census tract level, and not the block group level, areas of deep poverty within some tracts can be masked. This likely occurs within Census Tract 612. Block Group 1 of this tract, discussed at length above for its concentration of minority residents, has a median income that is less than half that of Block Group 3 and less than a third of that of Block Group 2 of the same tract. It likely has a much higher poverty rate than the other two block groups as well, but that is masked when looking at poverty rate at the block group level by the influence the other two block groups have on the mean. Thus, the northeastern most part of this tract as shown in Figure 7 would more realistically be in line with the deeper red that exists across the river.

When comparing the disability and poverty maps, the correlation is apparent. Correlation does not always imply causation, however, so it is impossible to tell how much overlap there is and how many individuals in each area are both disabled and impoverished. However, given that having a disability limits the number of jobs one can perform, depending on the disability; it is not unreasonable to infer that there is enough overlap to be significant.

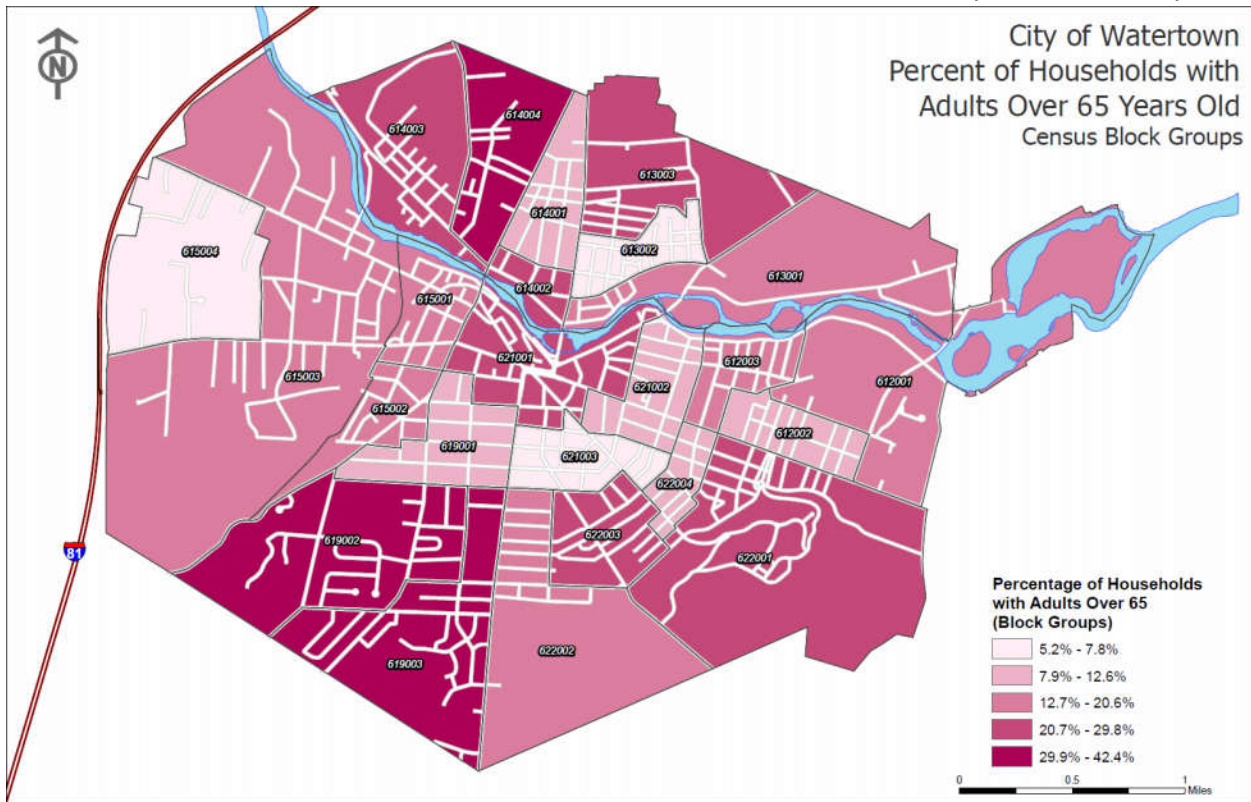
FIGURE 7: POVERTY RATE, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

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FIGURE 8: PERCENT OF HOUSEHOLDS WITH ADULTS OVER 65 YEARS OLD, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

There is a sizeable pocket of senior citizens in two block groups on the south side of the city as shown in Figure 8. However, both block groups are over 90 percent white and both have median incomes above the city-wide median. Overall, the rest of the senior population is spread relatively evenly throughout the rest of the city, with a notable exception.

The most noteworthy aspect of Figure 8 is the relative absence of senior citizens in Census Tract 615, Block Group 4 at the far western end of the city, which has a percentage of households with adults over 65 years old that is one-third the city average and the second smallest of any block group in the city. As mentioned before, this could further suggest a large military population in the garden-style apartments in that block group, as soldiers are unlikely to bring their parents or grandparents with them to garrison.

Before moving on from the demographic patterns, it is relevant to make a final, more specific note, which is only partially represented in the maps, about Census Tract 612, Block Group 1 at the far eastern end of the city. While basic poverty data is not available below the census tract level, one metric that is available at the block group level is "Poverty Status in the Past 12 Months of Families by Family Type By Presence of Related Children Under 18 By Age of Related Children." The Census Bureau's defined Universe for this metric is Families, rather than

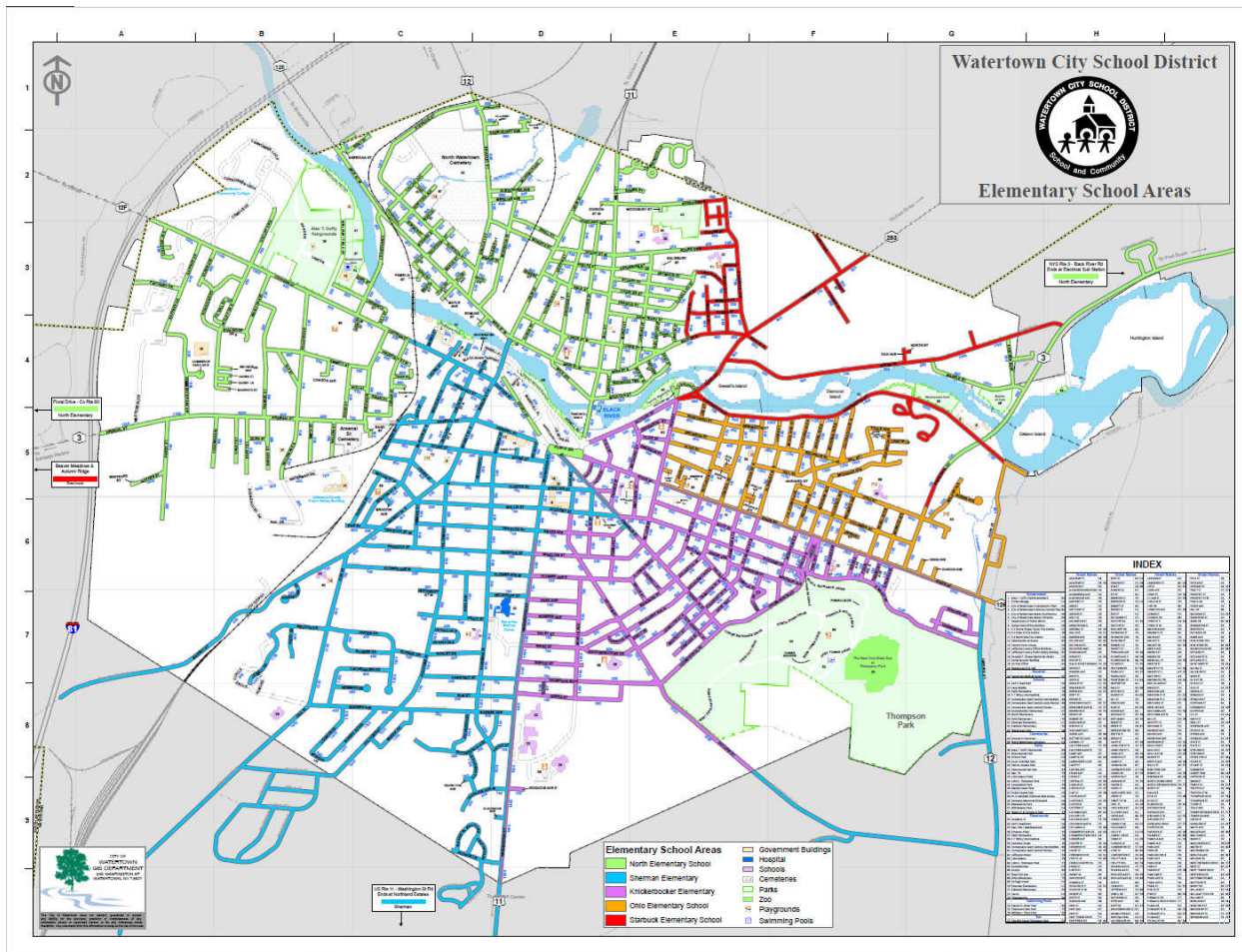
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the entire population for whom poverty status is determined, therefore it is impractical to use as a true poverty measure across block group lines. However, by this metric, 146 of 449 (or 32.5 percent) of families living in this block group are single-mother headed *and* below the poverty line. Single mothers can be particularly vulnerable to familial status discrimination and harassment in part because their lower household incomes limit their housing options.

Educational Opportunity---

The City of Watertown has only one eponymous school district, with five elementary schools feeding a city-wide, grades 5-12 campus that includes an intermediate, middle, and high school. Given the disparity in median income illustrated in Figure 4, it is not surprising that elementary schools in different parts of the city have students from different socioeconomic backgrounds. Figure 9 depicts the jurisdictions for the city's five elementary schools.

FIGURE 9: ELEMENTARY SCHOOL AREAS, WATERTOWN, NY



Source: City of Watertown GIS Department

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One metric through which to examine the socioeconomic status of students at various schools is to consider their eligibility for free and reduced-price lunch. This number changes every year as students matriculate in and out of each school. However, approximately 80 percent of students at Starbuck Elementary (red on the map) and 70 to 75 percent of students at Ohio Elementary (orange) are eligible for free and reduced price lunch. By comparison, Sherman and Knickerbocker Elementary Schools on the south side have percentages that are usually about half of their northern counterparts.

School enrollment by race generally parallels the patterns of diversity illustrated in Figure 3. Not surprisingly, Starbuck Elementary and Ohio Elementary have the greatest percentages of Hispanic students, with 15.38 percent and 14.61 percent respectively, while the other three elementary schools all have approximately 8 percent Hispanic enrollment. Starbuck and Ohio also have the highest percentage of black students at 10.86 percent, although the lowest percentage of black students is Knickerbocker’s 7.34 percent, so the range is much smaller than it is with Hispanic students. The full diversity statistics for Watertown’s five elementary schools is shown in Table 2 below.

The above average Hispanic enrollment (and non-White enrollment overall) at Ohio Elementary and Starbuck Elementary mirrors the free and reduced lunch eligibility referred to above. This further reflects the area of racially and ethnically concentrated poverty identified in Census Tract 612, Block Group 1. The boundary between the enrollment areas splits the block group, with Huntington Street, which runs along the riverside and includes the Huntington Heights apartment complex which accepts Section 8 vouchers, being drawn in with Starbuck’s enrollment area.

Ohio Elementary has a slightly higher mix of incomes than Starbuck, due to the wealthier households in Block Groups 2 and 3 of Census Tract 612, which fall in the western half of Ohio’s enrollment area. This gives children from lower-income households that attend Ohio Elementary the opportunity to make friends across class lines. That opportunity might not be quite as strong at Starbuck.

Interviews with school staff indicate that a fair number of new parents with the financial means will move to the south side so that their children can go to Sherman or Knickerbocker.

TABLE 2: RACE AND ETHNICITY IN WATERTOWN, NY ELEMENTARY SCHOOLS

School	White	Hispanic	Black	Asian	Native American	Hawaiian/Pacific Islander	Multiple Races
Knickerbocker	75.4%	8.4%	7.3%	0.9%	0.0%	0.0%	8.0%
North	71.8%	8.0%	10.1%	0.4%	0.4%	0.4%	7.3%
Ohio	63.2%	14.6%	10.6%	0.8%	0.3%	0.0%	10.6%
Sherman	73.1%	7.7%	8.0%	4.0%	0.0%	0.3%	6.9%
Starbuck	64.7%	15.4%	10.9%	0.5%	0.0%	0.0%	8.6%

Source: Watertown City School District

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These parents' decisions are motivated by the perception that schools in higher-income areas are better; the reality is that the five offer very similar preparations for intermediate school and beyond. The primary difference between the schools is in parental involvement in their children's school experience, not in teacher quality or overall school quality.

Input from school staff implied that parents in the lower-income areas are more concerned with how many hours their child can spend at school during the school day, whereas parents in the wealthier areas are more concerned with their children's performance and test scores. Parental involvement, or lack thereof, does not affect teacher commitment however.

It is likewise difficult to draw any concrete conclusions from Common Core test results across the five City elementary schools. Table 3 shows the percentages of test takers scoring a 3, which marks proficiency, or above on the third and fourth grade Common Core English language arts and math examinations at all five schools for the 2014-15 school year, as well as the average percentage of test takers scoring a 3 or above across all four tests at each school. Table 4 shows the mean scale scores for each test at all five schools and the average mean scale score for each school across all four tests.

While Table 3 reveals some disparity, it is difficult to attribute that disparity to affluence. While twice as high a percentage of test takers at the more affluent Sherman school scored a 3 or higher than at the lower-income Starbuck, that difference is almost entirely attributable to fourth grade scores, as the schools' third grade performances are comparable. On the flip

TABLE 3: PERCENTAGE OF TEST TAKERS SCORING LEVEL 3 OR HIGHER

<u>School</u>	<u>Gr. 3 Eng.</u>	<u>Gr. 3 Math</u>	<u>Gr. 4 Eng.</u>	<u>Gr. 4 Math</u>	<u>Avg.</u>
Knickerbocker	21.3	24.3	20.9	29.3	23.95
Sherman	27.2	25.5	43.4	56.8	38.23
Ohio	23.9	33.3	19.3	28.5	26.25
Starbuck	25	25	9.5	9.5	17.25
North	24	31.4	25	49.3	32.43

Source: Watertown Daily Times

TABLE 4: MEAN SCALE SCORES

<u>School</u>	<u>Gr. 3 Eng.</u>	<u>Gr. 3 Math</u>	<u>Gr. 4 Eng.</u>	<u>Gr. 4 Math</u>	<u>Avg.</u>
Knickerbocker	281	289	286	293	287.25
Sherman	284	287	304	315	297.5
Ohio	288	296	290	293	291.75
Starbuck	301	297	285	273	289
North	291	298	295	308	298

Source: Watertown Daily Times

PROFILE OF THE CITY OF WATERTOWN

side, Ohio and North both outperformed Knickerbocker, which has the highest-income block group in the City in its enrollment area and in theory should see a higher level of parental involvement. In addition, Table 4 shows that with the exception of the Grade 4 math exam, the mean scale scores at all five schools are comparable.

As a small city, unlike in major metropolitan areas, Watertown does not face the challenge of the best teachers leaving inner-city schools for suburban districts. Teachers at Ohio and Starbuck do say that many of their students come from single-parent households, live with their grandparents, or face other difficulties at home, and that this is a factor in the classroom. However, teachers at these schools generally do not express a desire to transfer to wealthier areas.

Overall, it is difficult to measure the degree to which location impacts educational outcome in the City of Watertown. While a greater percentage of minority children attend the elementary schools in lower-income areas, it is parental involvement that varies between different elementary schools, while teacher commitment is consistent across the district. Measurement beyond elementary school is impossible, and would be purely speculative, since grades 5-12 are city-wide and thus classes reflect the overall diversity and full range of incomes within the city.

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HOUSING PROFILE

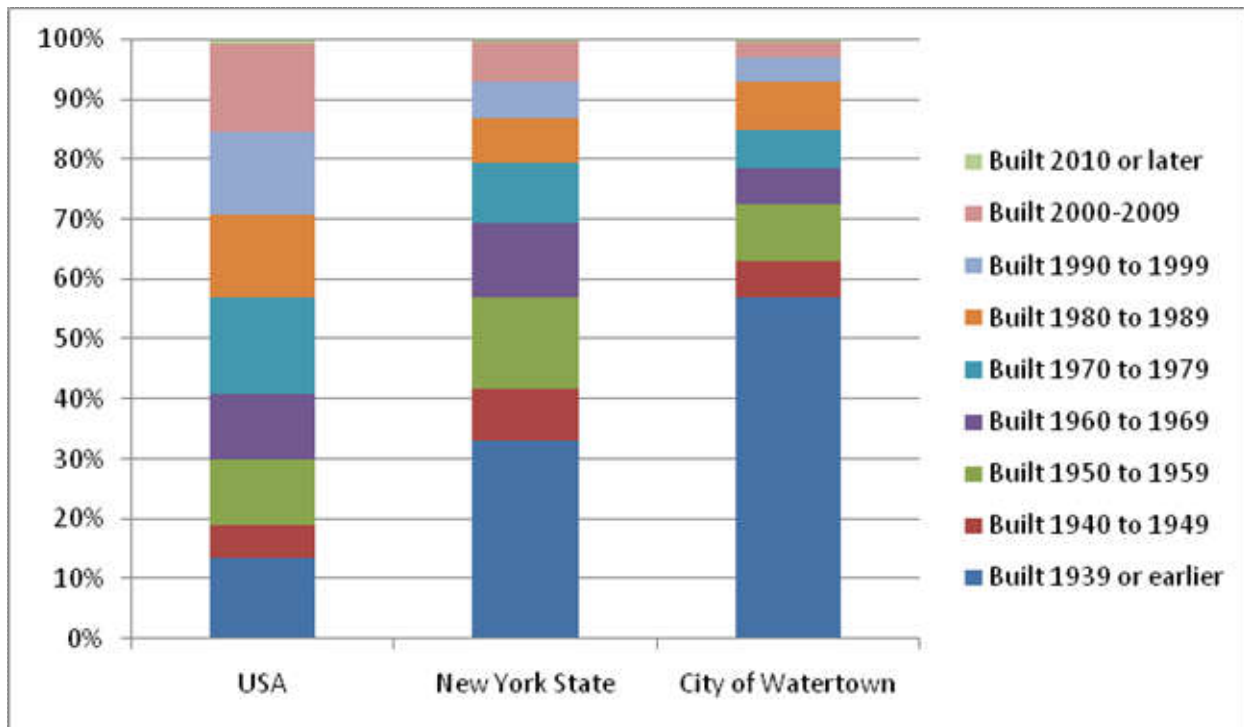
The influence of Fort Drum’s proximity was alluded to in the Demographic Patterns section. However, it is in an analysis of the City’s housing situation that the impact of the base’s proximity becomes clearer.

Historical Context

Beginning in the mid-19th Century and lasting over 100 years, Watertown had a strong manufacturing sector. Paper making first became an important industry in Watertown in the 1860s, and the city would become the center of one of the most important paper making areas in the nation (Landon 36). Between 1880 and 1900, the carriage industry grew tremendously in the City of Watertown. As railroads, especially freight rail, increased in importance, New York Air Brake became a major employer in the city.

The second half of the 20th Century saw a decline in manufacturing however, and as shown in Figure 2 in the Demographic Patterns section, this coincided with a sharp population decline until the stationing of the 10th Mountain Division at Fort Drum. However, Watertown’s population growth and decline through history still has an impact on its housing stock. Few new dwellings were constructed during the years of decline, leading to a much older housing stock than many other, faster growing, areas of the country. As shown in Figure 10, over half of Watertown’s housing stock was built prior to World War II.

FIGURE 10: AGE OF HOUSING STOCK, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

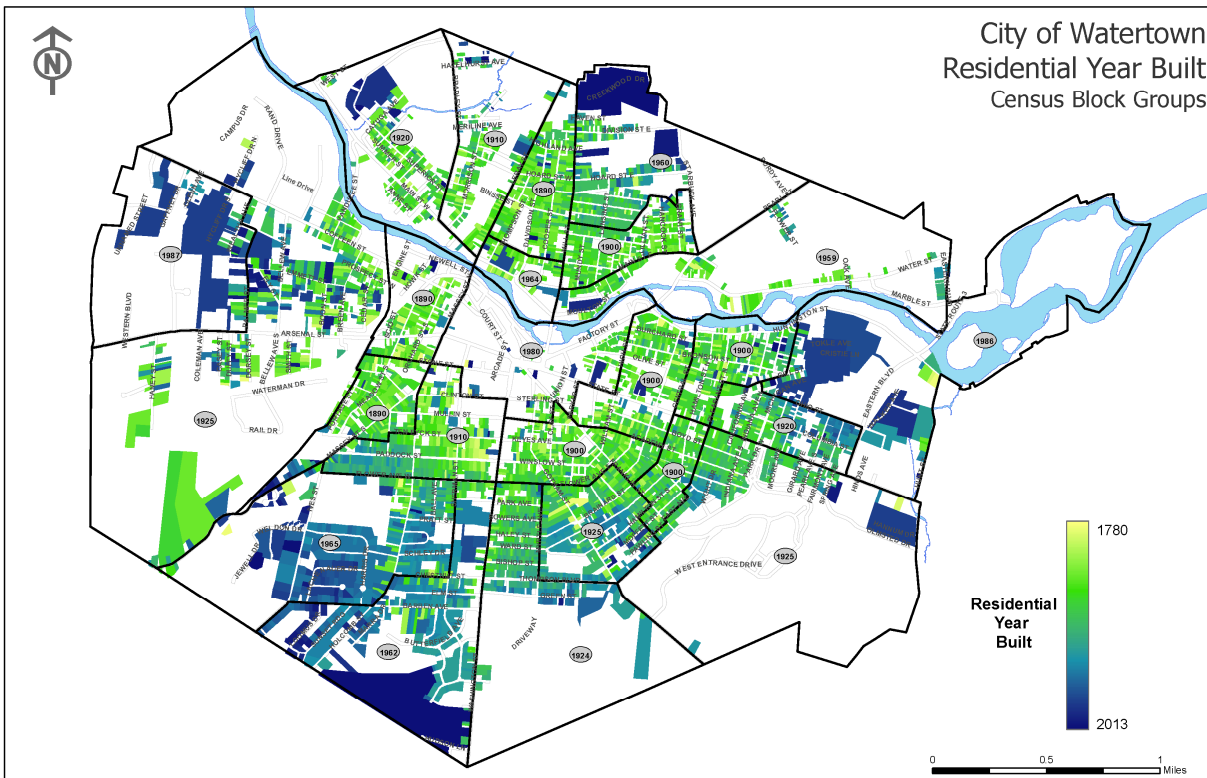
HOUSING PROFILE

Many of Watertown’s older housing units and neighborhoods have survived intact. In the 1950s, urban renewal brought Interstate highways through the center of many American cities, bisecting neighborhoods (often minority neighborhoods), dividing communities and begetting the demolition of many older residential buildings. In Watertown, however, Interstate 81 was routed around the city to the west, through what was then open fields. While other urban renewal projects did claim some downtown buildings, most of the city’s older neighborhoods have largely remained untouched.

Because of the age of Watertown’s housing stock, most of the city’s housing units were built prior to lead-based paint regulations. HUD considers any unit built prior to 1978 to be at risk for having lead-based paint; and 84.9 percent of Watertown’s housing stock was built in 1979 or earlier. Since lead-based paint poses a much greater health risk for young children than for teenagers or adults, this serves to limit the number of housing units in the city that are suitable for families with young children. The city’s last Consolidated Plan estimated that the total number of pre-1980 housing units with children present was 1,450.

Another concern is accessibility. The Americans with Disabilities Act of 1990 established accessible design and construction standards in 1991. However, 93.2 percent of the city’s housing

FIGURE 11: RESIDENTIAL YEAR BUILT, WATERTOWN, NY



Source: City of Watertown City Assessors Office

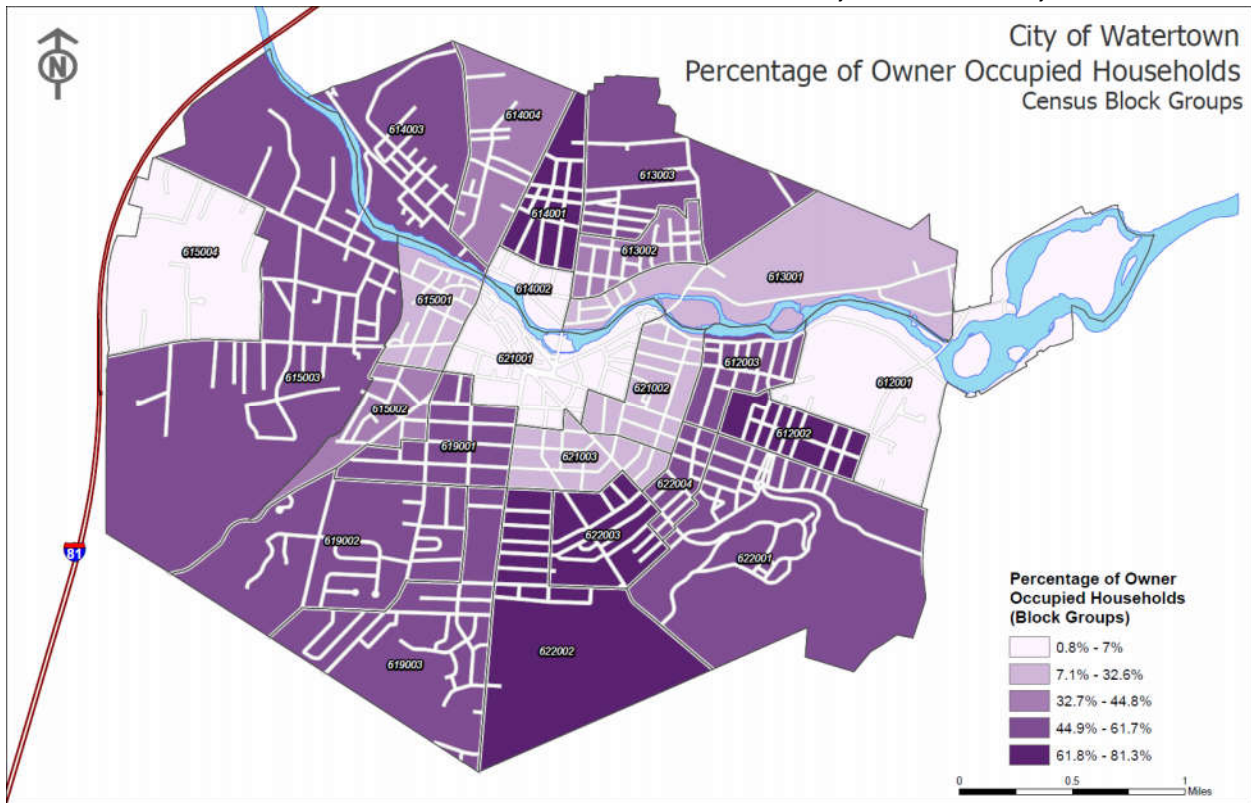
HOUSING PROFILE

was built prior to 1990. Figure 11 depicts the distribution of residential units across the city by year built. Watertown has a disabled population of 15.4 percent compared to a nationwide disabled population of 12.1 percent. In addition, 45.3 percent of Watertown’s age 65-and-up population is disabled, compared with a 36.5 nationwide average. With the concentrations of disabled persons in the city’s downtown core and on the north side that were identified above, this is a significant concern moving forward.

Lack of accessible housing was also a prime concern raised at the CNY Fair Housing Roundtable, held in April 2015 on Watertown’s north side. According to the CNY Fair Housing representative that moderated the event, discrimination or harassment due to disability is by far the number one source of complaints that the organization receives.

The issue of accessible housing generated significant discussion at the event, with one participant reporting having significant difficulty getting “reasonable accommodation” for people with disabilities, such as assigned parking or permission to have service animals, and said that, “Landlords are very unforgiving and claim that the tenant is exploiting the law in their favor.”

FIGURE 12: PERCENTAGE OF OWNER-OCCUPIED HOUSEHOLDS, WATERTOWN, NY



Source: 2009-2013 ACS 5-year estimates

HOUSING PROFILE

Supply of Affordable Housing and Homeownership---

Given Watertown's relative status as a military town, a somewhat transient population is to be expected. It is thus not surprising that there are a large amount of renters in the city, and that the rental market in Watertown far exceeds the national average. 41.6 percent of housing units in the city are owner-occupied and 58.4 percent are renter-occupied. Nationwide, 64.9 percent of housing units are owner-occupied and 35.1 are renter-occupied, meaning that Watertown's numbers are almost a full inversion of the national average.

Much of this phenomenon is attributable to soldiers at Fort Drum living off-base. Figure 12 illustrates the distribution of owner-occupied versus renter-occupied housing units across the City of Watertown. The downtown core and the two block groups at opposing ends of the city stand out as having the lowest rates of homeownership. This is not surprising as apartments make up the vast majority of housing units in these block groups. As mentioned before, each of the far eastern and western block groups contains multiple large, garden-style apartment complexes, and the downtown core has several buildings with upper floor apartments above commercial street level uses.

When comparing this map with Figure 3 (Population by Race) and Figure 4 (Median Household Income) in the previous section, the high concentrations of minority renters in the two block groups at opposing ends of the city stand out, and the much higher median income of the far western block group compared to the downtown core and far east end stands out as well.

However, another thing that is clear from this map is that there are significant amounts of renters all over the city. Only four block groups out of 24 in the city have a percentage of owner-occupied households that is above the nationwide percentage. While this analysis theorizes a large military population in the far western end of the city based on data from the demographics section, the low owner-occupancy rate city-wide suggests that there are soldiers (and Officers with higher salaries) living in several other neighborhoods too.

As mentioned in the previous section, military personnel living off base receive a Basic Allowance for Housing (BAH) in addition to their regular paycheck. This subsidy has a considerable impact on the cost of housing in the City of Watertown. The City's Consolidated Plan estimates that non-military individuals earning less than about \$40,000, but more than the typical income limit for subsidized projects (\$33,050) may have difficulty finding affordable rental units. The median income in Watertown is \$38,004 compared to a nationwide median of \$53,046.

Figure 13 and Figure 14 illustrate that housing cost burdens are being felt across the city, and it is not limited to renters. Figure 13 depicts the percentages of households that are spending over 30 percent of their monthly income on rent. This map considers renter-occupied house-

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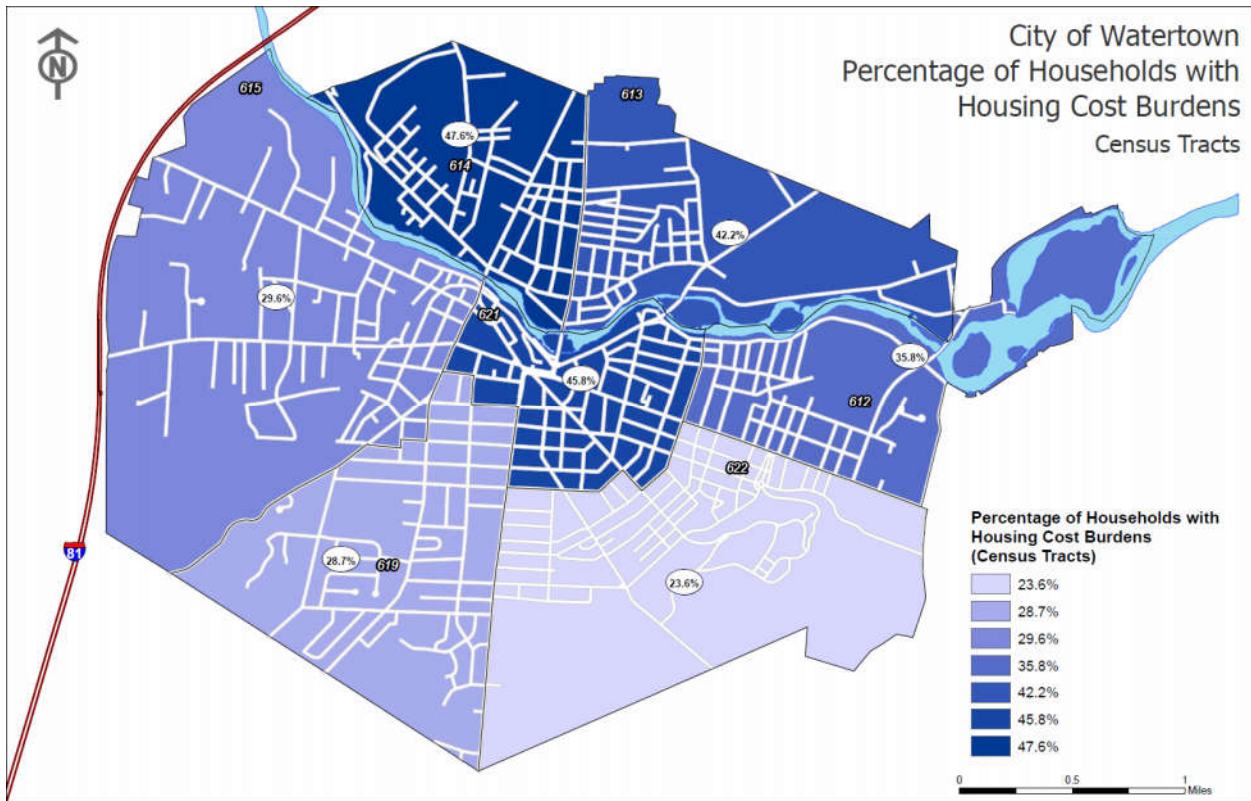
The Consolidated Plan identifies low-income, non-military households and individuals as vulnerable to the effects of the BAH on the housing market. Given the volume of disability-related complaints discussed at the CNY Fair Housing Roundtable and the data on these maps, it is evident that disabled people are a particularly vulnerable protected class in the City of Watertown.

Location of Subsidized Housing

As of this writing, Lewis County Opportunities provides 490 families with Section 8 Housing Choice Vouchers in the City of Watertown. Figure 14 illustrates the distribution of where those vouchers are being used at the census tract level.

The most vouchers by far (143) are being used in the downtown census tract; with the two north side tracts (99 and 93 respectively) coming in second and third. Census Tract 612, the east side tract that contains the block group identified in the previous section as having an area of racially and ethnically concentrated poverty, is tied for the fewest vouchers used (27).

FIGURE 14: PERCENTAGE OF OWNER-OCCUPIED HOUSEHOLDS WITH HOUSING COST BURDENS, WATERTOWN, NY,



Source: 2009-2013 ACS 5-year estimates

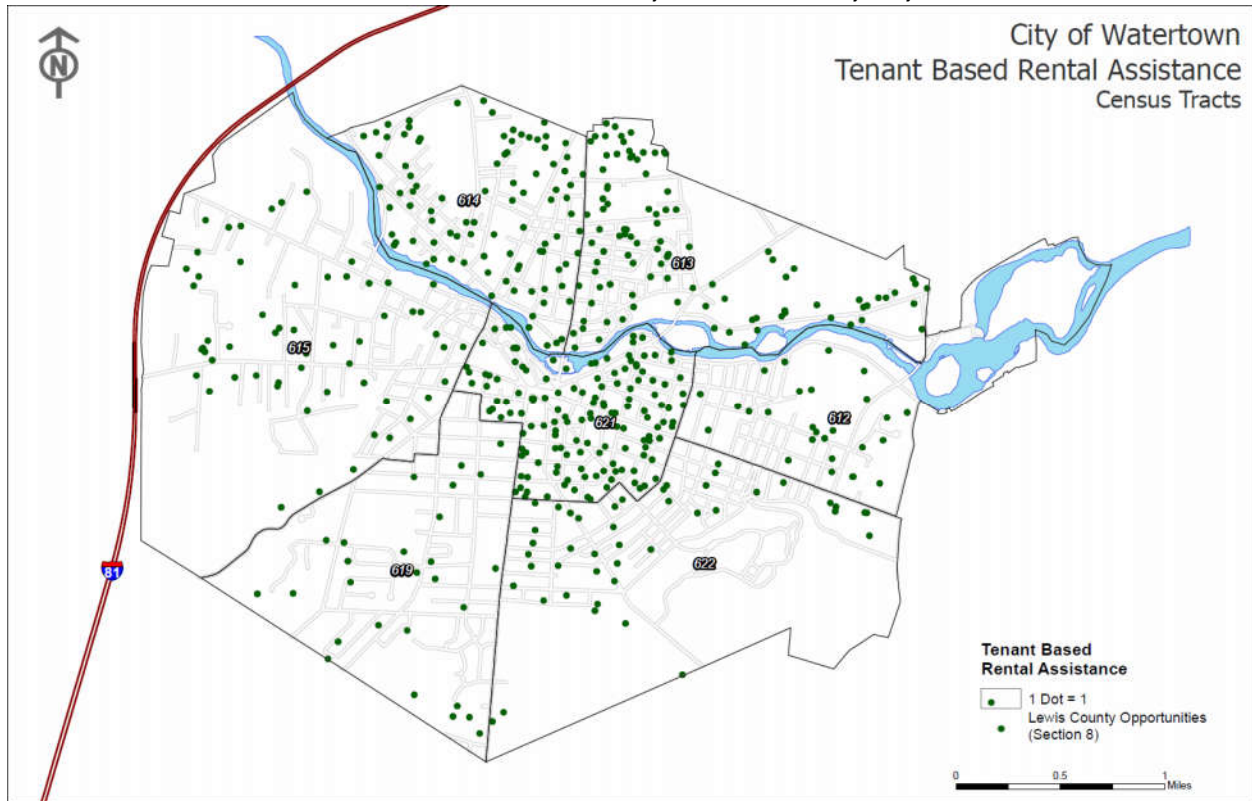
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There are two immediate observations from looking at the distribution of voucher use. The first is that two-thirds of vouchers are being used in the three census tracts with the three highest poverty rates, although these areas also correlate to the highest percentages of disabled population. Lewis County Opportunities reports 252 of the 490 households it issued vouchers to had at least one household member with a disability, with two thirds of those disabled households using their vouchers either in the downtown core or the north side, mirroring the distribution of voucher use as a whole.

The second observation is how few vouchers are being used in the areas at the eastern and western ends of the city, which are not only the areas with the highest diversity, but also the areas with the newest housing structures by year built. Comparing Figure 15 to Figure 11 suggests that many vouchers are being used on older units that are less suitable for families with young children and those with disabilities.

Given the disability data in the previous paragraph, it is possible that many disabled recipients of Section 8 vouchers are using their vouchers on housing units that are not adequate to their needs. There are reasons that voucher holders might be attracted to downtown, however, as discussed in the Identification of Impediments section.

FIGURE 15: TENANT BASED RENTAL ASSISTANCE, WATERTOWN, NY,



Source: Lewis County Opportunities

OTHER FACTORS IMPEDING HOUSING CHOICE

Lack of Information---

Another issue raised at the CNY Fair Housing Roundtable was a general lack of knowledge and understanding of fair housing requirements, among both tenants and landlords. At the event, participants expressed doubt that the general population, except for Fort Drum, understood fair housing. They felt that whereas Fort Drum individuals have experience living in other places; and with it a better understanding of fair housing, that meanwhile the non-military community in the North Country has little or limited knowledge about their fair housing rights.

On the topic of whether housing providers in the area understand fair housing, the discussion revealed a consensus that there are two distinct types of housing providers in the North Country; those that receive Federal assistance and *have* to understand fair housing, so they get training for it, and the free market that does not.

Owners and managers of large apartment complexes, even those not receiving Federal assistance, generally fall under the first category since their companies are usually familiar with fair housing. Independent landlords of individual buildings and subletters generally fall under the second category.

Several attendees at the roundtable event reported encountering fair housing issues, or at least receiving complaints or reports of possible violations. The issue of accommodation for people with disabilities is a recurring theme in this report; and landlords' reluctance to allow service animals or assigned parking were both mentioned at the roundtable event, and as stated earlier in this report, disability is by far the number one source of complains received by CNY Fair Housing.

Other examples of discriminatory behavior that attendees described included landlords telling residents that they cannot have two children sharing a bedroom or otherwise restricting the number of children they can have, even in multi-bedroom units, a concern over how military vs. non-military minorities are treated by housing providers, and a suspicion that they are treated differently even though such activity is rarely reported.

Victims of discrimination may not have any significant knowledge regarding their fair housing rights. Likewise, many property owners may not be fully aware of their responsibilities. Thus, a need for fair housing education for both housing providers and tenants was identified.

Land Use and Zoning---

No local land use or zoning policies that have a negative impact on affordable housing or residential investment have been identified. However, even though there are no regulations in the City Zoning Ordinance that are directly exclusionary or have the unintended effect of being

OTHER FACTORS IMPEDING HOUSING CHOICE

exclusionary, the City has been slow to adopt flexible zoning tools, such as density bonuses, to promote affordable housing development.

Density bonuses, which allow a developer to build at a higher density than the zoning ordinance allows, in exchange for making a specified percentage of new housing units affordable, could help the City increase its supply of affordable housing.

One example of flexible zoning that the City has implemented in recent years was creating the Downtown Zoning District in 2011. The Downtown District, which seeks to maintain a pedestrian-oriented quality with residential uses above street-level commercial, has no minimum lot size, no setback requirements and allows one housing unit for every 250 square feet of lot area as a means to promote density.

Transportation---

The City of Watertown's CitiBus public transit service does a good job at reaching a majority of households, shopping and employment centers within the city limits, as 86 percent of city addresses are within a ¼ mile walk to the bus. However, the bus service stops running shortly after 6 pm, with the last boarding opportunity in many places occurring before 6 pm.

Since the CitiBus system is a hub-and-spoke style organization of routes, many trips require transferring at a downtown transfer station to get from Point A to Point B. Three of the five lines in the system make their final daily departure from the transfer station at 5:40 pm and the other two make their final departure from the transfer station at 5 pm. This means that anyone whose trip requires a transfer must complete the first leg of their trip before these times. This leaves very little leeway for anyone using the bus to commute home from work. It also limits the hours that captive riders are available to work if they have no other means of transportation.

An additional result of the Watertown-Fort Drum urbanized area being designated as a Metropolitan Statistical Area following the 2010 Census was the creation of a regional metropolitan planning organization (MPO) to handle transportation issues. The MPO, officially named the Watertown-Jefferson County Area Transportation Council, is responsible for preparing a regional transportation plan, and for implementing improvements to the area's highways, bridges and public transit services. As the new MPO grows and settles into its role, the potential will exist for it to plan expanded transit opportunities.

IDENTIFICATION OF IMPEDIMENTS AND RECOMMENDATIONS

Impediment 1: The influence of Fort Drum and the military's Basic Allowance for Housing makes it difficult for low-income, non-military families to find affordable housing in the City of Watertown and creates a bias where landlords are eager to rent to the military.

The largest impediment to fair housing choice in the City of Watertown is the effect of the Basic Allowance for Housing on rental asking prices. Housing providers are familiar with the BAH and they set their rents accordingly. As a result, many low and even some moderate-income renters are spending much more of their income on rent than they can reasonably afford. Another consequence of the BAH is that many, though certainly not all, housing providers prefer military tenants because they believe that military personnel are more reliable rent-payers.

Discussion at the NYS HCR public meeting also suggested that some housing providers renting to military personnel will call a soldier's Commanding Officer if that soldier is not taking proper care of his/her apartment. This practice offers the housing provider an additional layer of assurance that their property is being well maintained, and gives them another reason to prefer military tenants.

It is evident that a significant amount of people with housing to rent are attempting to market their properties to attract military tenants. On August 24, 2015, City Staff viewed the most recent four days worth of Craigslist housing postings in the Greater Watertown Area. When controlling for only postings for housing within the City boundaries and when counting duplicate ads only once, Staff found that 34 out of 80 postings mentioned proximity to Fort Drum as a selling point, with some of them advertising how many miles or minutes the property was from the base.

This creates a very difficult situation for someone that is not in the military, but needs affordable housing. The Housing Analysis section has documented the difficulties faced by disabled people in finding adequate housing in the city, and Impediments 2-4 will discuss ways to help alleviate those difficulties. The disabled population, however, is a protected class under the Fair Housing Act. The effects of the BAH impact everyone that needs affordable housing in Watertown, whether they are a member of a protected class or not.

Affordable housing and fair housing are not one and the same, and although there are times when the two may overlap, it is possible to achieve one without achieving the other. A municipality achieving fair housing does not mean that that municipality has met its affordable housing needs and vice versa. Fair housing is the availability of housing on an equal basis without regard to any of the protected classes identified at the beginning of this report. Affordable housing is the availability of housing that is priced to accommodate residents of limited economic means. While high housing costs are not a direct form of housing discrimination, a lack of affordable housing does limit housing choice.

IDENTIFICATION OF IMPEDIMENTS AND RECOMMENDATIONS

In many large cities, high numbers of people and households that are members of protected classes under the Fair Housing Act may utilize affordable housing, and in more diverse cities, they may do so at disproportionate rates. In the City of Watertown, while there *are* members of protected classes utilizing affordable housing, such as the 252 disabled households receiving Section 8 assistance, there are many low-income residents that are *not* members of protected classes, but still need affordable housing.

In its certification to HUD that it will affirmatively further fair housing, the City of Watertown pledged that it will promote fair housing choice for *all persons*. The Needs Assessment Overview in the City's Consolidated Plan identifies housing cost burden as by far the most prevalent housing problem in the City of Watertown, and this analysis concurs. It is the most significant impediment to fair housing choice for members of protected classes and non-protected classes alike.

Recommendations

1. Advocate for affordable units in new multi-family housing construction.
2. Utilize flexible zoning tools, such as density bonuses, to achieve the above.
3. Support Assembly Bill A.5166 in the New York State General Assembly, which adds source of income as a protected class and prohibits housing discrimination against tenants using public assistance, such as Section 8 vouchers, to pay their rent.

Impediment 2: The City's aging, substandard housing stock limits housing choice for households with small children or people with disabilities.

Most of the housing units in the City of Watertown were built before the disuse of lead-based paint and before the adoption of accessibility standards. Less than 10 percent of the housing units in the city were constructed after both reforms had been implemented. Because of this, there is a significant shortage of adequate units for both populations. Although exact numbers are impossible to project, there doubtlessly are children living in units with lead-based paint hazards and disabled people living in units not designed or retrofitted to meet their needs.

Recommendations

1. Continue to use grants to support local nonprofits in their efforts to rehabilitate the city's housing stock.
2. Continue to make the rehabilitation of owner-occupied and rental housing a priority in the City's 5-year Consolidated Plan and Annual Action Plans.
3. Advocate for developers to set aside a greater percentage of accessible units, above

IDENTIFICATION OF IMPEDIMENTS AND RECOMMENDATIONS

and beyond what is required by law, for all new multi-family housing constructed in the city.

4. Investigate the feasibility of creating a home accessibility program using CDBG funds aimed at providing accessibility improvements to older homes in the city through the construction of ramps, lifts and other accessibility renovations of owner-occupied and rental homes.

Impediment 3: Voucher use is concentrated in parts of the city with the oldest housing stock and highest poverty rates.

Two-thirds of Section 8 Vouchers distributed by Lewis County opportunities that are used in the city are being used on units in the downtown core and north side, where there are elevated rates of poverty, disability and older buildings. Tenant-based voucher use is designed to provide individuals with mobility and access to better opportunity and help to create mixed-income communities rather than continue to enable the concentration of poverty.

With all of the above in mind, it is possible that recipients of voucher assistance might choose to live in the downtown core because of proximity to CitiBus's downtown transfer station, the "hub" in the hub-and-spoke system design. Therefore, a downtown location would provide transit access to the entire city without the need to transfer. Another possible motivation to choose to live downtown is that many downtown units are in mid-rise buildings that, although older, have elevators. For the disabled population, this is an advantage over the garden-style apartments at the edges of the city that only have stairs.

It is important that voucher holders enjoy fair housing choice and do not suffer source of income discrimination. It is possible that the downtown core represents the best choice and thus has become the most popular destination for voucher holders. However, it is still the City's responsibility under its certification to affirmatively further fair housing to ensure that there is fair housing choice throughout the city.

Recommendations

1. Support retrofitting housing units across the entire city to make them accessible; do not confine such projects to downtown only.
2. When discussing the prioritization of owner-occupied and rental housing rehabilitation in the 5-year Consolidated Plan and Annual Action Plans, identify the need to target all areas of the city for rehabilitation efforts.
3. Work with Lewis County Opportunities to educate landlords on the goals and objectives of tenant-based voucher assistance programs.

IDENTIFICATION OF IMPEDIMENTS AND RECOMMENDATIONS

Impediment 4: A general lack of knowledge about Fair Housing rights, among both tenants and housing providers, enables the persistent imposition of undue hardships on disabled residents.

A major topic of discussion at the CNY Fair Housing Roundtable was the lack of understanding of fair housing rights among much of the population, and that dichotomies have developed among housing providers and tenants when it comes to understanding fair housing rights and principles.

Among renters, the Fort Drum community tends to understand their fair housing rights, as many military renters have experience living in other places and moving often. The general local population, conversely, is less likely to be aware of their fair housing rights.

Among housing providers, those that receive Federal assistance know that they need to understand fair housing and they obtain the appropriate training. The free market, on the other hand, has far less knowledge about fair housing.

Discussion at the NYS HCR event suggested that lack of knowledge was an impediment in many communities around New York State, and that the State was examining the possibility of implementing a Fair Housing awareness program.

Recommendations

1. Work with the Community Action Planning Council of Jefferson County to provide fair housing training to private housing providers.
2. Encourage local housing providers as well as tenants to participate in any potential State-organized Fair Housing awareness program.
3. Publish tenants' Fair Housing rights on the City's website as well as what to do if you are a victim of housing discrimination. Make brochures containing the same information available at City Hall as well.

CONCLUSION

There are no easy solutions to Watertown's housing challenges. While Fort Drum's presence inflates the cost of housing, it is the economic lifeblood that sustains the city. As the largest single-site employer in New York State, Fort Drum is essential to Watertown's existence, and the BAH is here to stay.

In addition, although much of Watertown's housing is exceedingly old, the market does not exist for a plethora of new construction starts, like exists in faster-growing major cities. New construction does occur, but not at a rate that will significantly alter the age distribution of the city's housing stock.

The best path forward right now is to work to ensure that of the new housing that does get built, an appropriate number of units are affordable and accessible, and to boost ongoing efforts to rehabilitate older units to meet modern accessibility standards.